

Two Bridges LSRD **DraftFinal Scope of Work for Preparation of a** **Draft Environmental Impact Statement**

This document is the Final Scope of Work for the Two Bridges Large Scale Residential Development Draft Environmental Impact Statement (DEIS). This Final Scope of Work has been prepared to describe the proposed projects, present the framework for the EIS analysis, and discuss the procedures to be followed in the preparation of the DEIS.

A Draft Scope of Work was prepared in accordance with the State Environmental Quality Review Act (SEQRA), City Environmental Quality Review (CEQR) procedures, and the 2014 CEQR Technical Manual and was distributed for public review. A public scoping meeting was held on May 25, 2017, at 2 pm and 6 pm, at the Manhattan Municipal Building, 1 Centre Street. The period for comments on the Draft Scope of Work remained open until the close of business on June 8, 2017, at which point the scope review process was closed. Subsequent to the close of the comment period, the lead agency reviewed and considered comments received during the public scoping process, and oversaw preparation of this Final Scope of Work. The DEIS will be prepared in accordance with this Final Scope of Work.

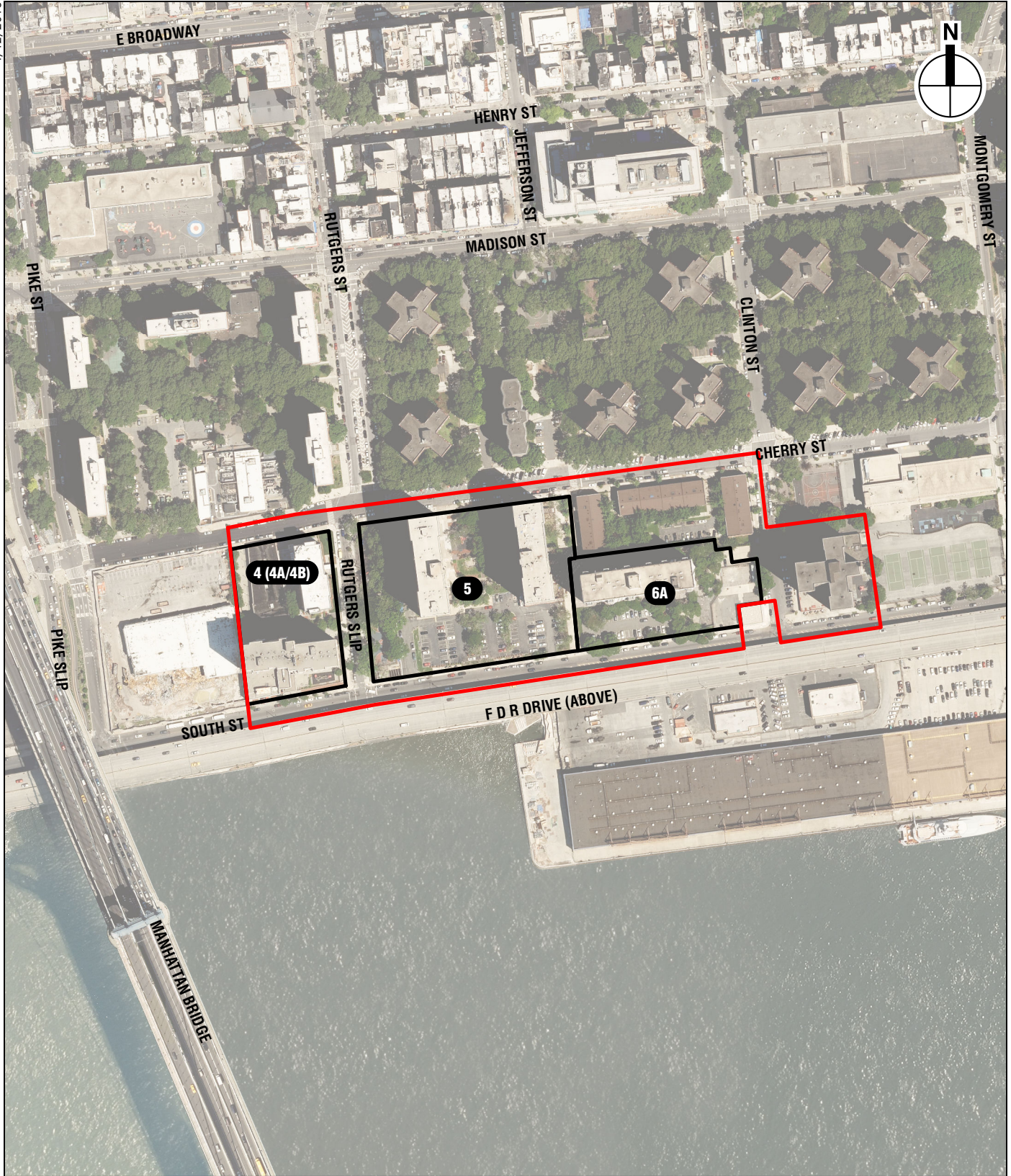
Appendix A to this Final Scope of Work identifies the comments made at the May 25, 2017 public scoping meeting and the written comments received, and provides responses. The written comments received are included in **Appendix B**. Revisions to the Draft Scope of Work have been incorporated into this Final Scope of Work, and are indicated by double-underlining new text and striking deleted text.

A. INTRODUCTION

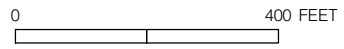
This ~~Draft~~Final Scope of Work outlines the technical areas to be analyzed in the preparation of an Environmental Impact Statement (EIS) for the proposed development of three new mixed-use buildings within the Two Bridges Large Scale Residential Development (LSRD) in the Lower East Side neighborhood of Manhattan. The Two Bridges LSRD is bounded by the midblock area between Clinton Street and Montgomery Street; Cherry, Clinton, and South Streets; and midblock between Rutgers Slip and Pike Slip (see **Figures 1 and ~~2~~through 3**). The three applicants—Cherry Street Owner, LLC; (an affiliate of JDS Development Group; and Two Bridges Senior Apartments LP); Two Bridges Associates, LP; (a joint venture between CIM Group and L+M Development Partners); and LE1 Sub LLC—each seek separate minor modifications to the existing Two Bridges LSRD to ~~allow for~~facilitate the development of the ~~proposed~~three mixed-use buildings.

The three proposed projects have separate developers, approvals, and financing; however, they are being considered together for environmental review purposes since all three project sites are located within the Two Bridges LSRD and would be developed during the same construction period. As such, the potential environmental impacts of the three proposed projects are being considered cumulatively.

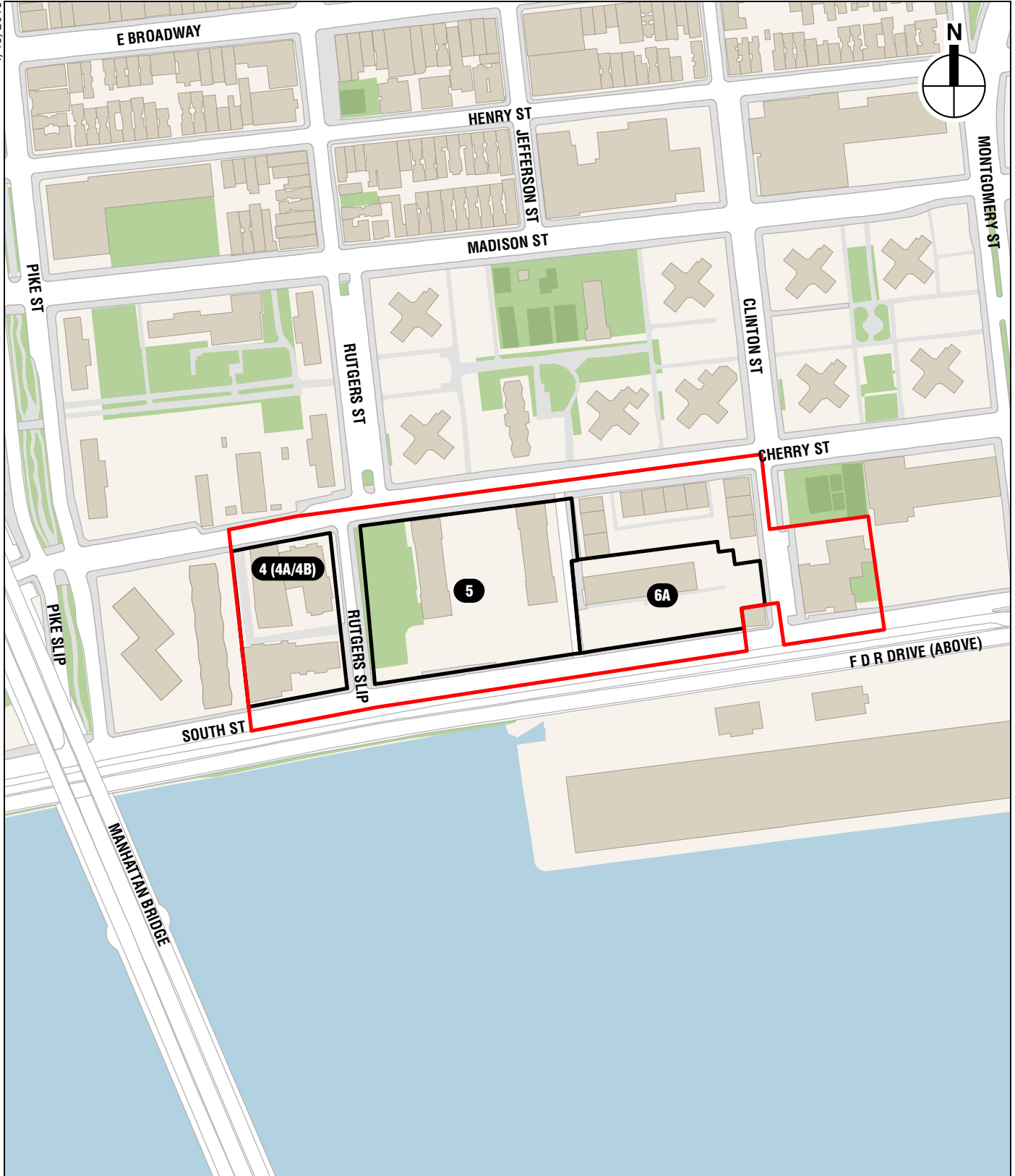
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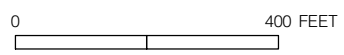
- Project Sites
- Boundary of Two Bridges LSRD



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-  Project Sites
-  Boundary of Two Bridges LSRD

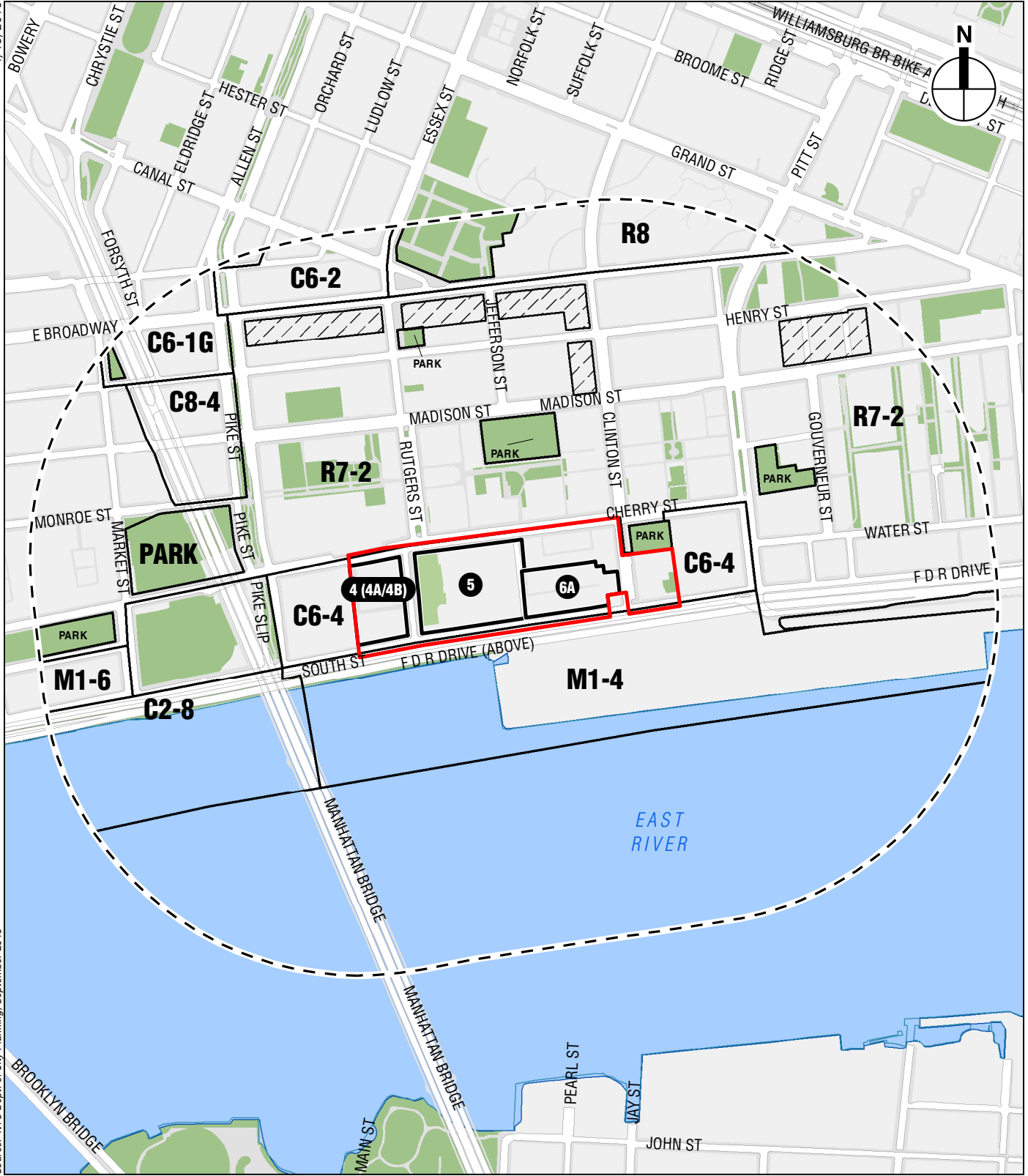


TWO BRIDGES LSRD

Project Location
Figure 2

4/16/2018

Source: NYC Dept. of City Planning, September 2016



- Project Sites
- Boundary of Two Bridges LSRD
- Study Area (Quarter-mile boundary)
- Zoning District Boundary
- C1-5 Commercial Overlay District



TWO BRIDGES LSRD

Zoning
Figure 3

Two Bridges LSRD

The New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), ~~will be~~ is the lead agency for the environmental review. Based on the prepared Environmental Assessment Statement (EAS), the lead agency has determined that the proposed projects have the potential to result in significant adverse environmental impacts, requiring that an EIS be prepared. This ~~Draft~~Final Scope of Work outlines the technical areas to be analyzed in the preparation of a ~~Draft EIS (DEIS)~~ for the proposed projects. Scoping is the first step in the preparation of the EIS and provides an early opportunity for the public and other agencies to be involved in the EIS process. It is intended to determine the range of issues and considerations to be evaluated in the EIS. This ~~Draft~~Final Scope of Work includes a description of the proposed projects and the actions necessary for their implementation, presents the proposed framework for the EIS analysis, and discusses the procedures to be followed in the preparation of the DEIS. The *City Environmental Quality Review (CEQR) Technical Manual* ~~will serve~~ serves as a general guide on the methodologies and impact criteria for evaluating the proposed projects' effects on the various environmental areas of analysis.

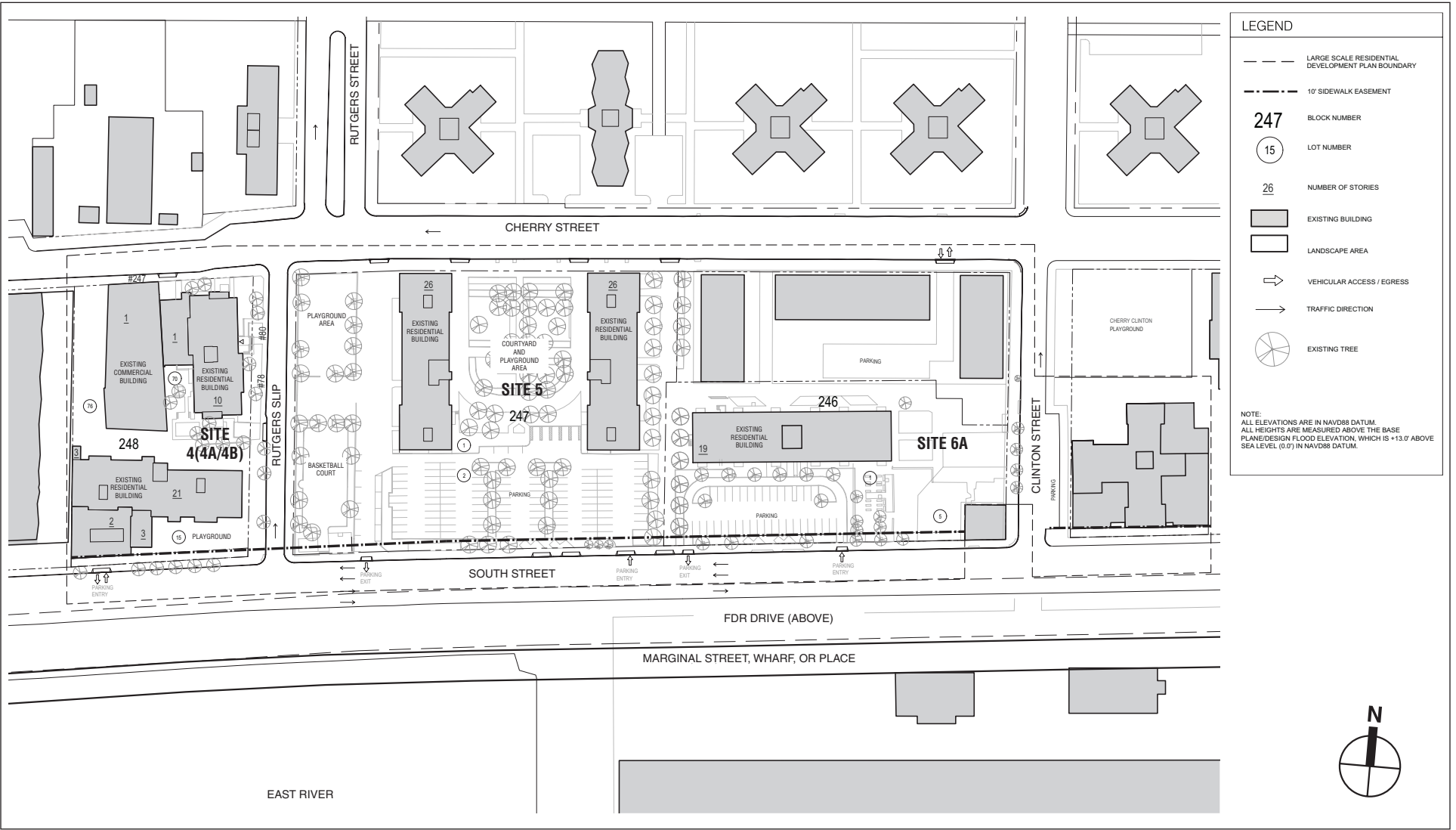
B. AREA AFFECTED BY THE PROPOSED ACTIONS

The project sites area to be affected by the proposed actions is located in the Lower East Side neighborhood of Manhattan in Community District (CD) 3, within the boundaries of the former TBURA Two Bridges LSRD (see Figures 1 through 3 and 2 above). The three project sites are Site 4 (4A/4B) on Block 248, Lots 15, 70, and 76; Site 5 on Block 247, Lots 1 and 2; and Site 6A on Block 246, Lots 1 and 5 (see Figures 4 and 5). The other sites within the Two Bridges LSRD—Site 6B on Block 246, Lots 1101-1057 and Site 7 on Block 245, Lot 1—will not be affected by the proposed actions. Site 6B is currently occupied by three 3-story buildings with a total of 57 residential units, and Site 7 is currently occupied by a 27-story residential building with 250 units and 30 parking spaces.

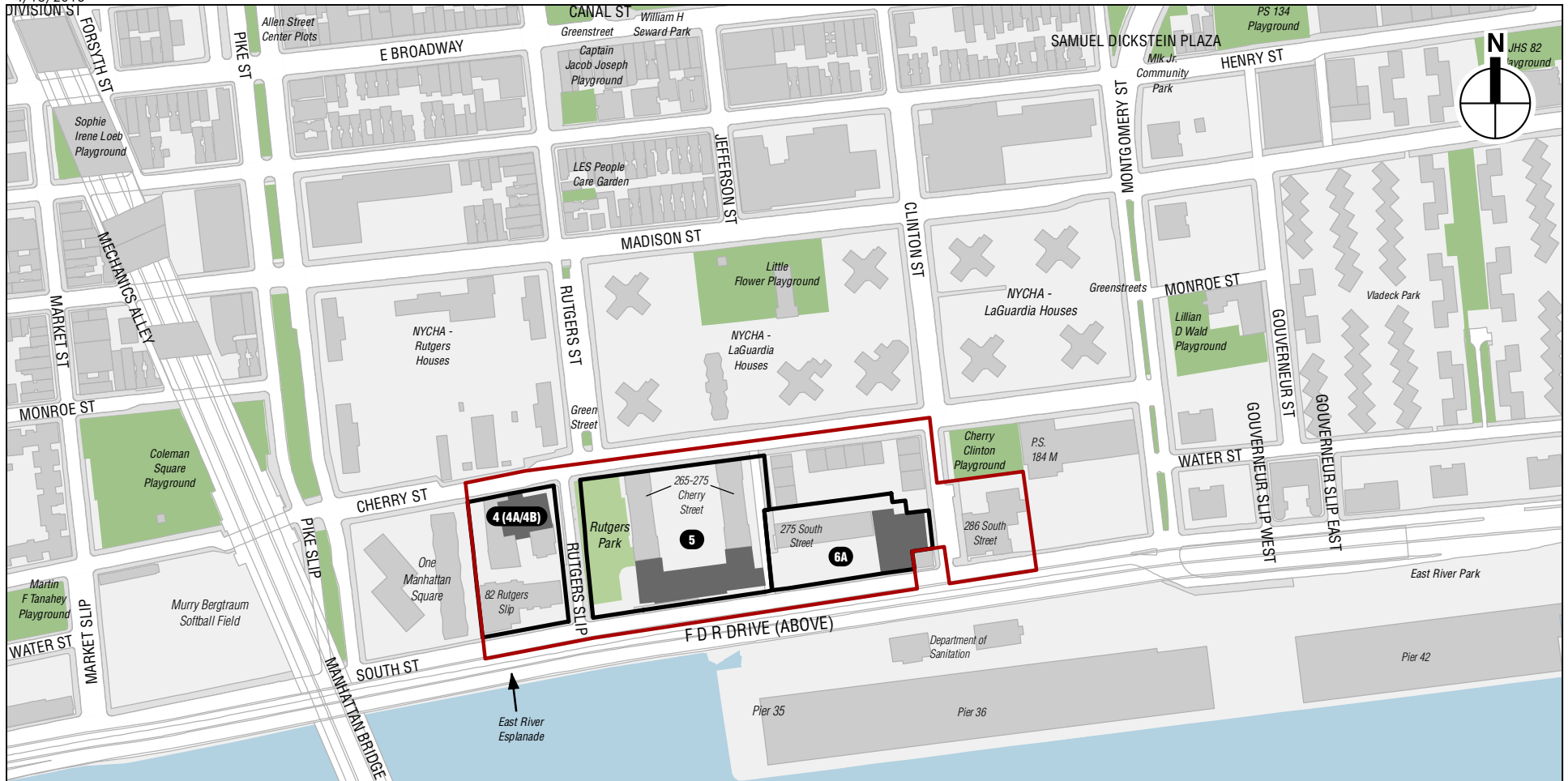
BACKGROUND

The former Two Bridges Urban Renewal Area (TBURA) was designated as an urban renewal area on January 15, 1961. This area covered 14 acres along the East River in Lower Manhattan bounded by Market Street to the west, South Street to the south, Montgomery Street to the east, and Cherry Street to the north. Development in the former TBURA was governed by the Two Bridges Urban Renewal Plan (TBURP), the goals of which included eliminating blight and restoring the residential character of the area; providing well-designed low, moderate, and middle income housing; providing convenient recreational, commercial, and community facility uses; achieving high quality urban design, architecture, street and open space elements; and strengthening the City's tax base by encouraging development and employment opportunities in the area. The TBURP was originally approved by the CPC and the Board of Estimate (BOE) in 1967. Over the years, the TBURP was amended and the TBURA was developed. The TBURP expired in June 2007.

The Two Bridges LSRD ~~Special Permit~~ was originally approved by the CPC on May 17, 1972 (CP-21885) and was last amended on August 23, 2013 (M120183 ZSM). The 2013 amendment was to allow for the development of a new mixed-use building on Site 5, as well as the enlargement of existing retail use and the relocation of 103 existing accessory surface parking spaces on that site. That proposed development did not occur. The Two Bridges LSRD includes six of the former TBURA parcels, which were initially developed in seven stages pursuant to the Two Bridges LSRD ~~Special Permit~~ Approvals (see Appendix C, LSRD Approvals). The boundaries of the



Existing Conditions Site Plan
All Projects
Figure 4



- Project Sites
- Boundary of Two Bridges LSRD
- Proposed Buildings
- Publicly Accessible Open Space

Two Bridges LSRD are illustrated in **Figures 1 through 34** above. The Two Bridges LSRD Special Permit Approvals, as amended, remains in effect.

All of the project sites are located within a C6-4 zoning district (see **Figure 3**), a district that has been mapped in the project area since 1961. C6 districts are commercial districts that permit a wide range of high-bulk commercial uses that require a central location. C6 districts permit corporate headquarters, community facilities, and high-rise residences in mixed-use buildings. C6-4 districts permit a maximum floor area ratio (FAR) of 10.0 for commercial, community facility, or residential uses (or up to 12.0 FAR with inclusionary housing). As C6-4 districts are typically mapped in districts that are well served by mass transit, off-street parking is generally not required. One parking space per 4,000 zoning square feet (zsf) of new community facility or commercial space is permitted and limited to 100 spaces, or 225 spaces for mixed-use developments. All new parking spaces must be located in an enclosed building. There is no height limitation in C6-4 districts.

PROJECT SITES

SITE 4 (4A/4B)

Site 4 (4A/4B) includes Block 248, Lots 15, 70, and 76, and contains a total lot area of 69,210 square feet (sf), with approximately 335,434 of existing zoning square feet (zsf) for a built FAR of 4.85, if assumed as a single zoning lot (see **Figure 4**). Up to approximately 495,086 existing zsf remain unbuilt (based on a maximum of 12 FAR, with inclusionary housing). Lot 70 is owned by Two Bridges Senior Apartments LP, and Lot 76 is owned by Two Bridges Housing Development Fund Company, Inc. Lot 76 and a portion of Lot 70 are under contract for purchase by applicant Cherry Street Owner, LLC (with Two Bridges Senior Apartments LP retaining ownership of the remainder of Lot 70). Lot 70 is occupied by the Two Bridges Helen Hayes Senior Residence at 80 Rutgers Slip, an approximately 85,615-gross-square-foot (gsf) (109-unit), 10-story residential (Use Group 2) building (~~80 Rutgers Slip~~) and has four surface accessory parking spaces and 3,928 sf of open space. Lot 76 contains 235 Cherry Street, a partially vacant, approximately 11,575-gsf one-story commercial building (~~235 Cherry Street~~) with Use Group 6 retail and 280 sf of open space. Lot 15 is occupied by the Two Bridges Tower at 82 Rutgers Slip, an approximately 255,447-gsf (198-unit), 21-story mixed-use residential building (~~82 Rutgers Slip~~) with an 11-space enclosed accessory parking facility, and 11,660 sf of paved, private but publicly accessible open space to the north of the building, adjacent to 235 Cherry Street and 80 Rutgers Slip. The existing residential buildings on Lot 70 (80 Rutgers Slip) and Lot 15 (82 Rutgers Slip) contain affordable housing, including affordable senior housing at 80 Rutgers Slip. Site 4 (4A/4B) is located on the west side of Rutgers Slip, between Cherry Street to the north and South Street to the south. Site 4 (4A/4B) has three existing curb cuts, one each on Cherry Street, Rutgers Slip, and South Street. An as-of-right zoning lot merger will be required in order to facilitate this project. Lot 15 will be part of the zoning lot.

SITE 5

Site 5—owned by applicant Two Bridges Associates, LP—comprises Lots 1 and 2 of Block 247. Site 5 is 145,031 sf in size and is located between Cherry Street, South Street, Rutgers Slip, and the former alignment of Jefferson Street (demapped) (see **Figure 4**). Site 5 has approximately 615,071 of existing zsf, for a built FAR of 4.24. Up to approximately 1,125,301 zsf remain unbuilt (based on a maximum of 12 FAR, with inclusionary housing).

Two Bridges LSRD

The CPC in 1977 permitted construction of the Land's End II development on Site 5. Completed in 1979, this complex includes two 26-story rental apartment buildings for low-income households at 265 and 275 Cherry Street (634,983 gsf and 490 units total); a paved surface parking lot with 103 parking spaces on South Street; a paved area ~~west~~between the private Rutgers Slip Open Space and the west side of the 265 Cherry Street building; and private playgrounds and landscaped seating areas in the private courtyard area between the two buildings. The building at 265 Cherry Street includes a small amount of local retail use on the ground floor. Site 5 also includes ~~at the private open space~~Rutgers Slip Open Space along the Rutgers Slip block frontage that contains playgrounds equipment, seating areas, and a basketball court. Site 5 has four existing curb cuts on Cherry Street and five existing curb cuts on South Street.

(E) Designations Assigned to the Site

Lot 2 on the Site 5 project site is assigned an (E) ~~designation~~Designation for air quality, noise, and hazardous materials, listed in the DCP (E) ~~designation~~Designation database as E-312, established in the 2013 *Two Bridges (Health Care Chaplaincy) Environmental Assessment Statement* (CEQR No. 12DCP157M, M120183ZSM). The hazardous materials (E) ~~designation~~Designation requires that a Phase I of the site be submitted to OER for review and approval, along with a soil and groundwater testing protocol. OER ~~will~~would make a determination regarding whether remediation is necessary based on the results of the testing. If remediation is indicated from the test results, a proposed remediation plan must be submitted to OER for review and approval. The applicant must complete such remediation as determined necessary by OER, and provide documentation that the work has been satisfactorily completed. In addition, an OER-approved construction-related health and safety plan would be implemented during excavation and construction activities.

The (E) ~~designation~~Designation for air quality requires that the proposed building on this site use natural gas as the only fossil fuel for any on-site heating and water systems, and must be located on the tallest portion of the proposed building. The proposed building's on-site heating and hot water systems also would be designed to ensure that maximum concentrations of nitrogen dioxide do not exceed the National Ambient Air Quality Standard (NAAQS) on a 1-hour average basis. To attain this standard, the proposed building's boilers used for space heating would have low-NO_x (<16 ppm) burners, the boilers used for hot water would utilize low-NO_x (<20 ppm) burners, and the boilers would have a stack placement of a minimum of 260 feet from the lot line facing Cherry Street or a minimum of 236 feet from the lot line facing Rutgers Slip. The maximum capacity of equipment used for space heating and hot water would be 6 MMBTU/hour.

The (E) ~~designation~~Designation for noise requires that future community facility uses must provide up to 38 dBA of window/wall attenuation to achieve interior noise levels of 45 dBA.

SITE 6A

Site 6A comprises Block 246, Lots 1 and 5, with Lot 5 owned by LE1 Sub LLC. The development site is part of a merged zoning lot that also includes Lot 1. Site 6A is located on the west side of Clinton Street at South Street. Lot 5 is currently vacant; Lot 1 is occupied by 275 South Street, a 19-story, 262,877 ~~zsf~~gsf (256-unit) residential building (~~275 South Street~~) and a 3534-space accessory surface parking lot facing South Street. ~~Two existing curb cuts provide access to this parking lot from South Street.~~ (see **Figure 4**). Site 6A contains a total lot area of 71,357 sf, with approximately ~~251,829~~262,877 of existing zsf, for a built FAR of 3.53. Approximately 593,407 zsf remain unbuilt (based on 12 FAR, with inclusionary housing). Two existing curb cuts provide access to this parking lot from South Street.

DESCRIPTION OF THE SURROUNDING AREA

The area surrounding the project sites includes two New York City Housing Authority (NYCHA) housing complexes—the LaGuardia Houses, LaGuardia Addition, and Rutgers Houses—and other tower residential developments, including the 27-story residential tower at 286 South Street (see **Figures 1 and 2**).

~~A-79~~An 80-story residential building is currently under construction directly west of Site 4 (4A/4B) at 250 South Street, outside the Two Bridges LSRD. The elevated Franklin Delano Roosevelt (FDR) Drive, which has been determined eligible for listing on the State and National Registers of Historic Places (S/NR-eligible), runs adjacent to South Street through the study area. A New York City Department of Sanitation facility is located south/southeast of the project sites at Pier 36, on the East River. Along the East River waterfront is the East River Esplanade, a bikeway located under the western cantilevered portion of the FDR Drive and waterfront walkway to the east of the FDR Drive. The closest subway station to the project sites is the East Broadway station (F line); followed by the Delancey Street/Essex Street (F, J, M, and Z lines) and Grand Street (B and D lines) stations; the closest bus route is the M22, which runs along Madison Street.

The area around the project sites south of Cherry Street is zoned C6-4. The area to the north of Cherry Street is zoned R7-2. The area to the south of the project sites (south of South Street) and west of the Manhattan Bridge is zoned M1-4. The area west of the Manhattan Bridge and south of the FDR Drive is zoned C2-8 (see **Figure 3** above).

C. PROJECT DESCRIPTION PROPOSED ACTIONS

ACTIONS NECESSARY TO FACILITATE THE PROPOSAL PROPOSED PROJECTS

The proposed projects each require a minor modification to the previously approved Two Bridges LSRD (originally approved by CP-21885; last amended by M 120183 ZSM).¹ (See **Appendix C** for a summary of previously granted LSRD certifications, authorizations, and special permits, the “LSRD Approvals.”) The proposed modifications to the Two ~~Two Bridges LSRD Special Permits~~site plan would ~~allow for~~enable the development of three new mixed-use buildings within the Two Bridges LSRD (see **Table AD**, LSRD Zoning Calculations in **Appendix AD**). The new mixed-use developments on each of the three project sites would comply with the underlying C6-4 district regulations applicable to the sites under the Zoning Resolution, and no discretionary use or bulk waivers would be required to facilitate the proposed projects. However, the previously approved Two Bridges LSRD site plans regulate~~restrict~~ the maximum developable floor area, lot coverage, location of buildings, and other features of development on the Two Bridges LSRD sites as shown in **Table AD**, LSRD Zoning Calculations in **Appendix BD**. While the proposed actions would not change the maximum FAR, floor area, or building envelopes permitted by the underlying zoning district, the requested minor modifications would modify the approved site plans to enable the proposed developments to be constructed within the Two Bridges LSRD boundary, utilizing unused existing floor area. Therefore, to facilitate the proposed projects described below and summarized in **Table 1**, modifications to the Two Bridges LSRD ~~Plan Approvals~~are being requested from the City Planning Commission (CPC)~~as described below and as summarized in Table 1 below.~~

¹ The M 120183 ZSM approval would be withdrawn upon approval of the minor modifications for the proposed projects.

**Table 1
Proposed Projects**

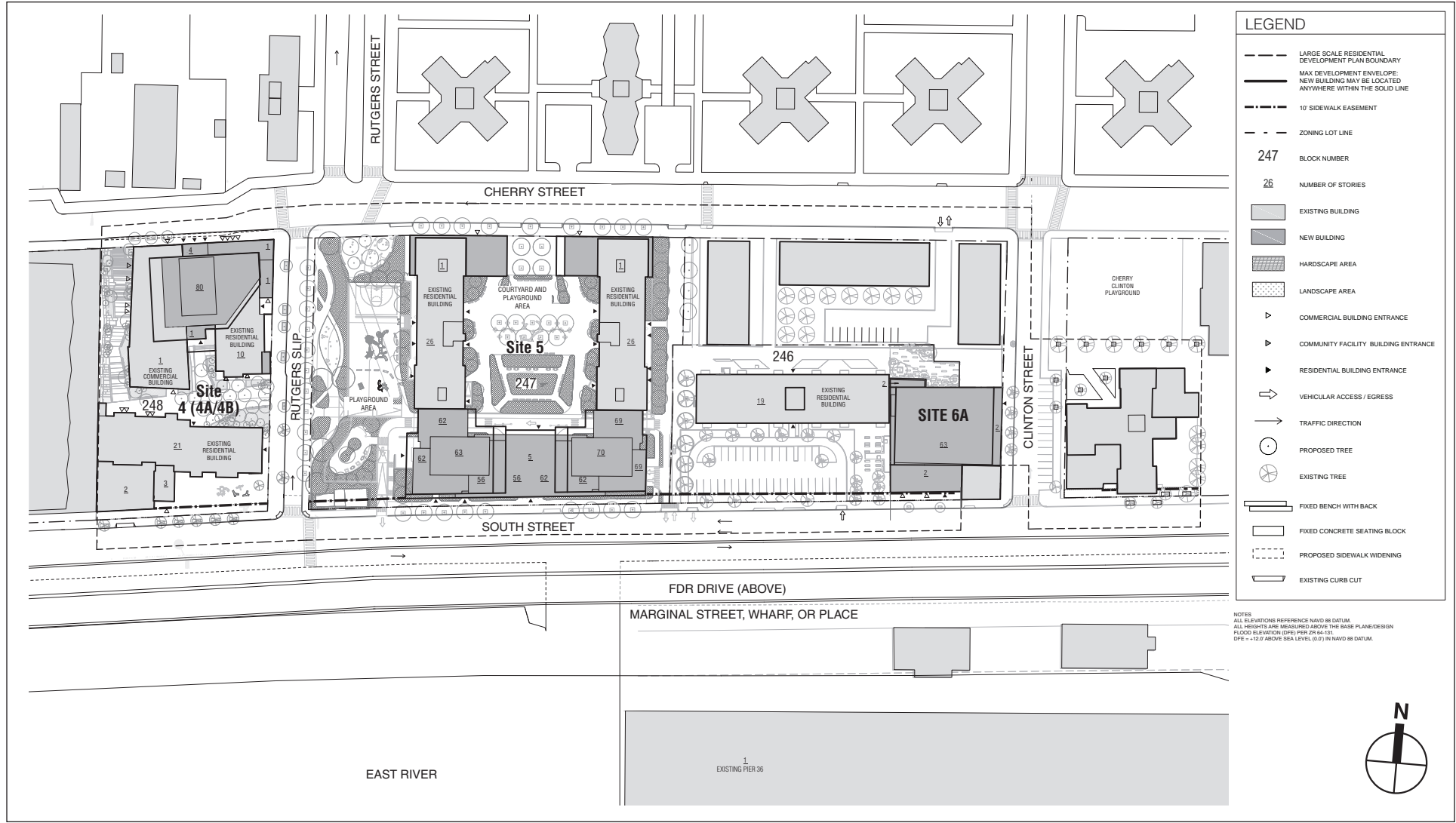
Use (GSF)	Site 4 (4A/4B) ¹	Site 5 ³	Site 6A ⁶	Total
Use Group 2 (Residential)	647,464 <u>629,944</u> gsf ²	1,227,932 gsf ⁴	670,667 669,851 gsf	2,546,063 <u>2,527,727</u> gsf
Residential Units	660 DUs	1,350 DUs (100 senior)	765 DUs (100 senior)	2,775 DUs (200 senior)
<i>Affordable Unit Count</i>	25 percent (up to 165 DUs)	25 percent (up to 338 DUs)	25 percent (up to 191 DUs)	Up to 694 DUs
Use Group 6 (Retail)	3,124 gsf	5,258 5,319 gsf	2,415 gsf	40,797 10,858 gsf
Community Facility	None	17,028 gsf	None	17,028 gsf
Accessory Parking	None	103 <i>below-grade</i>	None	103 <i>below-grade</i>
Private Open Space	None	19,579 sf ⁵	3,200 sf	22,779 sf
Maximum Building Height	±1,008'	±800'	±724' 730'	
Maximum Building Width	±121'	±283'	±137'	
Maximum Building Depth	±85'	±110'	±150'	

Notes:

- ¹ Does not include the existing development on Site 4 (4A/4B) (85,615 gsf [109 units] residential, 3,928 sf open space, and 4 surface parking spaces at 80 Rutgers Slip/Lot 70; 227,895 gsf residential [198 units], 27,552 gsf community facility, 11 enclosed accessory parking spaces, and 11,660 sf open space at 82 Rutgers Slip/Lot 15; and 11,575 gsf retail and 280 sf open space at 235 Cherry Street/Lot 76). ~~Absent the proposed projects in~~ (the No Action condition), existing development on Site 4 (4A/4B) would remain, ~~with minor changes to the existing 80 Rutgers Slip/Lot 70 building, and the existing retail in the Lot 76 building would be re-tenanted. With the proposed projects (in~~ the With Action condition), 10 existing units from the 80 Rutgers Slip building would be relocated into the new building, for a total of 99 remaining units at 80 Rutgers Slip, and up to 670 new units would be developed in the new building (including the 10 relocated senior housing units). The existing retail at 235 Cherry Street would be re-tenanted in the With Action condition, and the 15,868 sf of existing open space on Lots 15, 70, and 76 would be ~~improved~~altered with new amenities. The existing residential building with accessory parking at 82 Rutgers Slip/Lot 15 would remain in the With Action condition, but the 4 parking spaces at 80 Rutgers Slip/Lot 70 would be removed.
- ² For the purposes of determining the number of units to be analyzed, 8,079 gsf of community room and 5,113 gsf of ground-floor common area were subtracted from this total.
- ³ Does not include the existing development on Site 5 (634,983 gsf residential [490 units] and ~~2,085~~2,024 gsf retail at 265-275 Cherry Street), which would remain the same in the No Action and With Action condition.
- ⁴ For the purpose of determining the number of units to be analyzed, 81,683 gsf of residential amenity space, which includes building amenities (±55,356 gsf) and cellar level parking (±26,327 gsf) was subtracted from the total residential gsf, resulting in 1,146,249 gsf, with ±1,350 DU at 850 sf/DU.
- ⁵ New open space. The existing open space on Site 5 (approx. 64,152 sf) would also be ~~improved~~altered with new amenities, including play equipment, basketball courts, and landscaping, walking paths, and seating.
- ⁶ Does not include the existing development on Site 6A/Lot 1 (262,877 gsf residential [256 units] and 34 accessory surface parking spaces at 275 South Street), which would remain the same in the No Action and With Action condition.

The proposed minor modification for Site 4 (4A/4B) would ~~revise the Two Bridges LSRD parcel boundaries to combine Parcels 4A and 4B into new Parcel 4; (see Figures 6 and 7). It would also revise the Two Bridges LSRD Approvals to modify the site plans to permit the use of location and envelope of the new building; permit additional unused existing floor area at on the development site within a building envelope that is permitted by the underlying C6-4 zoning district regulations; and permit additional lot coverage at the development site.~~ These modifications would facilitate the development of a new approximately 1,008-foot-tall residential building with ground floor retail on a portion of Lot 70. The anticipated building and maximum building envelope are shown on Figures 7 and 8. This new building would cantilever over the existing 10-story senior housing building at 80 Rutgers Slip on Lot 70 and the 1-story commercial building on Lot 76. buildings on Lots 70 and 76 and It would provide new amenities, including pavers, plantings, and seating at the existing open space improvements on Lots 15, 70, and 76. No new parking would be provided. The existing buildings on Lots 15, 70, and 76 would be retained; however, the ground floor and westernmost portion of the existing building on Lot 70 (80 Rutgers

Source: SHoP Architects PC



NOTES:
CERTAIN ELEMENTS OF BUILDING DESIGN, SUCH AS THE MAXIMUM BUILDING ENVELOPE, WILL BE CONTROLLED UNDER THE PROPOSED MINOR MODIFICATIONS TO THE TWO BRIDGES LSRD APPROVALS.

OPEN SPACE DELINEATIONS AS SHOWN ARE APPROXIMATE.

LEGEND

- LARGE SCALE RESIDENTIAL DEVELOPMENT PLAN BOUNDARY
- MAX DEVELOPMENT ENVELOPE. NEW BUILDING MAY BE LOCATED ANYWHERE WITHIN THE SOLID LINE
- - - 10' SIDEWALK EASEMENT
- - - ZONING LOT LINE
- 247 BLOCK NUMBER
- 26 NUMBER OF STORIES
- EXISTING BUILDING
- NEW BUILDING
- HARDSCAPE AREA
- LANDSCAPE AREA
- COMMERCIAL BUILDING ENTRANCE
- COMMUNITY FACILITY BUILDING ENTRANCE
- RESIDENTIAL BUILDING ENTRANCE
- VEHICULAR ACCESS / EGRESS
- TRAFFIC DIRECTION
- PROPOSED TREE
- EXISTING TREE
- FIXED BENCH WITH BACK
- FIXED CONCRETE SEATING BLOCK
- PROPOSED SIDEWALK WIDENING
- EXISTING CURB CUT

NOTES
ALL ELEVATIONS REFERENCE NAVD 88 DATUM.
ALL HEIGHTS ARE MEASURED ABOVE THE BASE PLANE/DESIGN FLOOD ELEVATION (DFE) PER 2R 64-131.
DFE = +12.0' ABOVE SEA LEVEL (0.0') IN NAVD 88 DATUM.



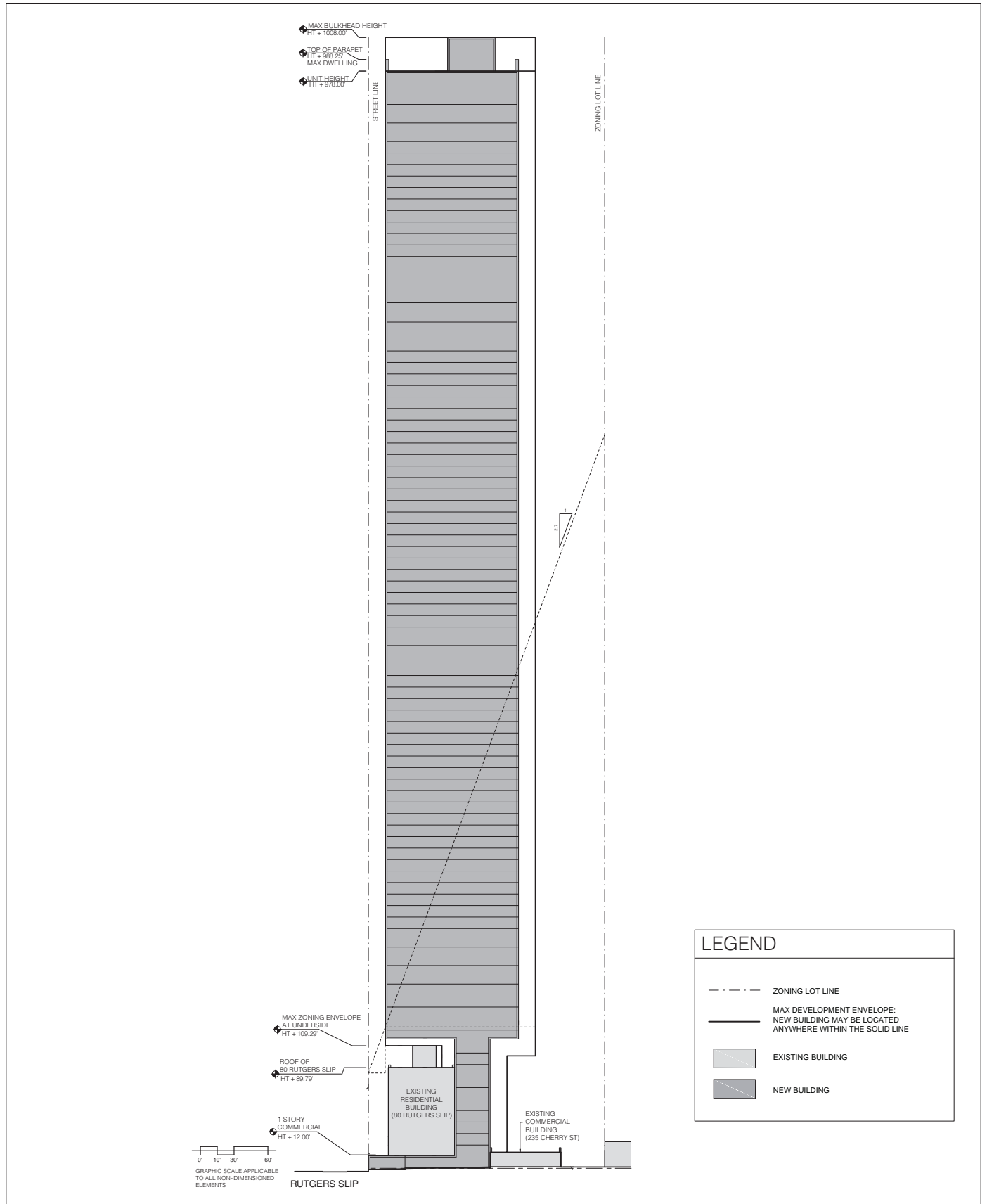


Source: SHoP Architects PC

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OPEN SPACE DELINEATIONS AS SHOWN ARE APPROXIMATE.

Source: SHoP Architects, PC



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 CERTAIN ELEMENTS OF BUILDING DESIGN, SUCH AS THE MAXIMUM BUILDING ENVELOPE, WILL BE CONTROLLED UNDER THE PROPOSED MINOR MODIFICATIONS TO THE TWO BRIDGES LSRD APPROVALS.

Site 4 (4A/4B)
 Representative Section (East-West)
Figure 8

Slip) would be reconfigured to allow for the introduction of ground floor retail and to accommodate the new development.

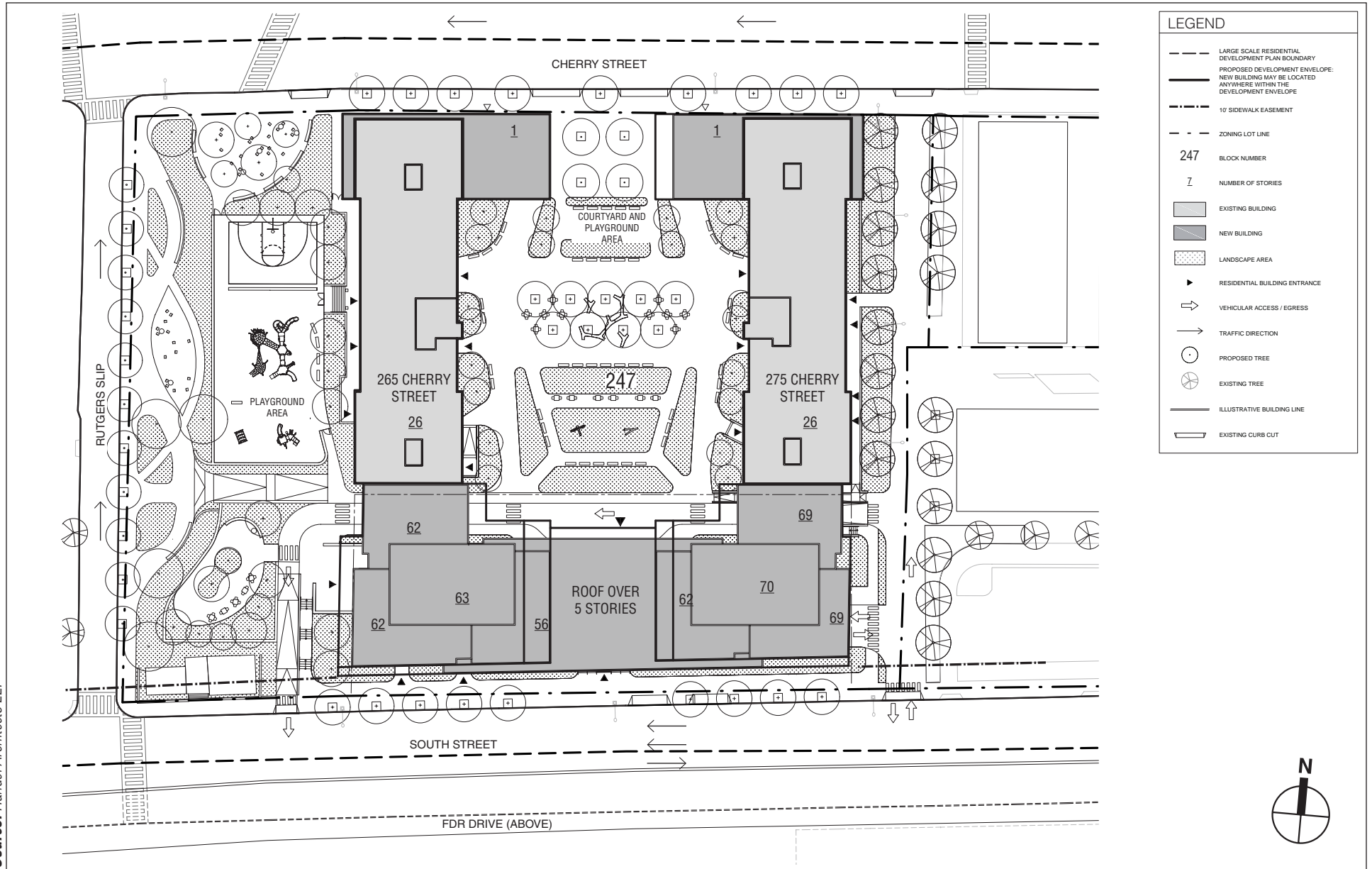
The proposed minor modification for Site 5 would revise the Two Bridges LSRD Special Permit Approvals to modify the site plans to enable the use of unused existing floor area on the development site within a building envelope that is permitted by the underlying C6-4 zoning district regulations (see Figures 6 and 9). ~~additional residential, commercial, and community facility floor area and increased lot coverage on Lots 1 and 2, and relocation of 103 existing accessory parking spaces.~~ These modifications would facilitate the development of a new mixed-use building with residential and community facility uses located in two towers (approximately 748 feet and 798 feet) on a shared base, replacing a paved surface parking lot. The anticipated building and maximum building envelope are shown on Figures 9 and 10. The development would ~~also provide on-site relocation of~~ relocate the existing 103 existing surface parking spaces from surface parking lots to a new below grade garage in the new proposed building; however, no new parking would be created. The two existing 26-story residential buildings at 265 and 275 Cherry Street would be retained, and ground floor retail space along Cherry Street would be enlarged. ~~In addition, the~~ The existing private courtyard between the 265 and 275 Cherry Street buildings would be relandscaped and the open space amenities on existing private Rutgers Slip Open Space would be improved enlarged, reconstructed with new amenities, including play equipment, basketball courts, and landscaping, walking paths, and seating and would be . ~~In addition, the Rutgers Slip Open Space would be~~ dedicated as publicly accessible open space.

The proposed minor modification for Site 6A would revise the Two Bridges LSRD Approvals ~~calculations to~~ modify the site plans to enable the use of unused existing ~~allow additional~~ floor area at on the development site within a building envelope that is permitted by the underlying C6-4 zoning district regulations (see Figures 6 and 11). ~~;~~ permit the locations and envelope of the new building; and ~~permit additional lot coverage at the development site.~~ These modifications would facilitate the development of a new approximately 730-foot-tall building on Lot 5 with retail and residential space, replacing an existing paved surface parking lot. The anticipated building and maximum building envelope are shown on Figures 11 and 12. No new parking would be provided. The existing 19-story residential building at 275 South Street on Lot 1 would remain. Separate from the minor modification, and not subject to environmental review, the Site 6A project also would require a certification pursuant to Section 32-435 of the Zoning Resolution of the City of New York to waive the ground-floor retail requirement along Clinton Street, a “wide street” as defined in the Zoning Resolution.

It is expected that there will be a Restrictive Declaration (RD) in conjunction with the proposed minor modification to the Two Bridges LSRD Approvals that will include Project Components Related to the Environment (PCREs) and mitigation measures for significant adverse impacts. ~~The proposed projects would comply with the underlying district regulations applicable to the sites under the Zoning Resolution, and no special permits, authorizations, or certifications are required other than the minor modifications to the LSRD described herein.~~

A.D. DESCRIPTION OF THE PROPOSED PROJECTS

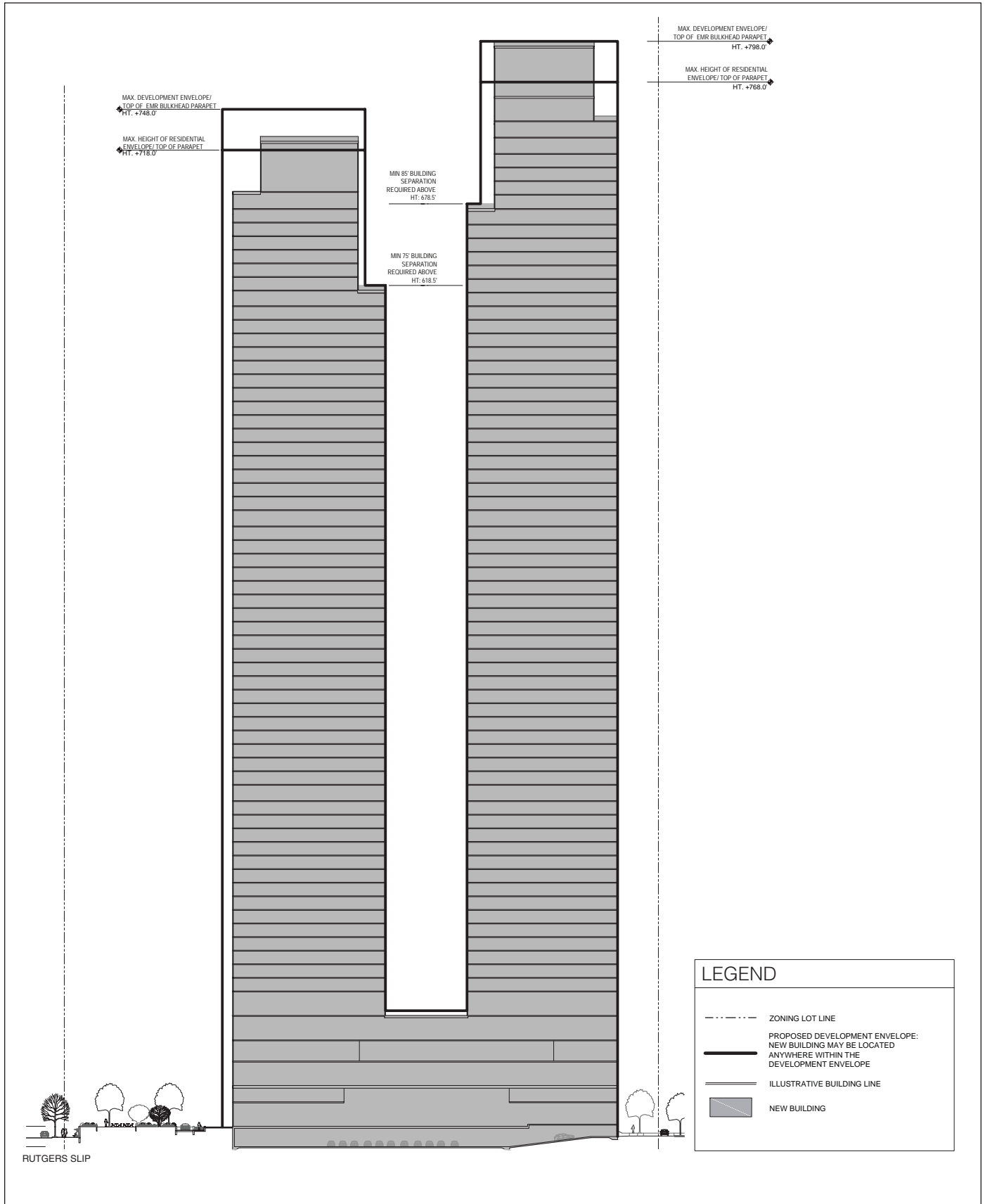
~~The three proposed projects are described in detail below. While the proposed projects require modifications to the LSRD controls, they would comply with and be allowed as of right under all provisions of the underlying district regulations for the sites.~~



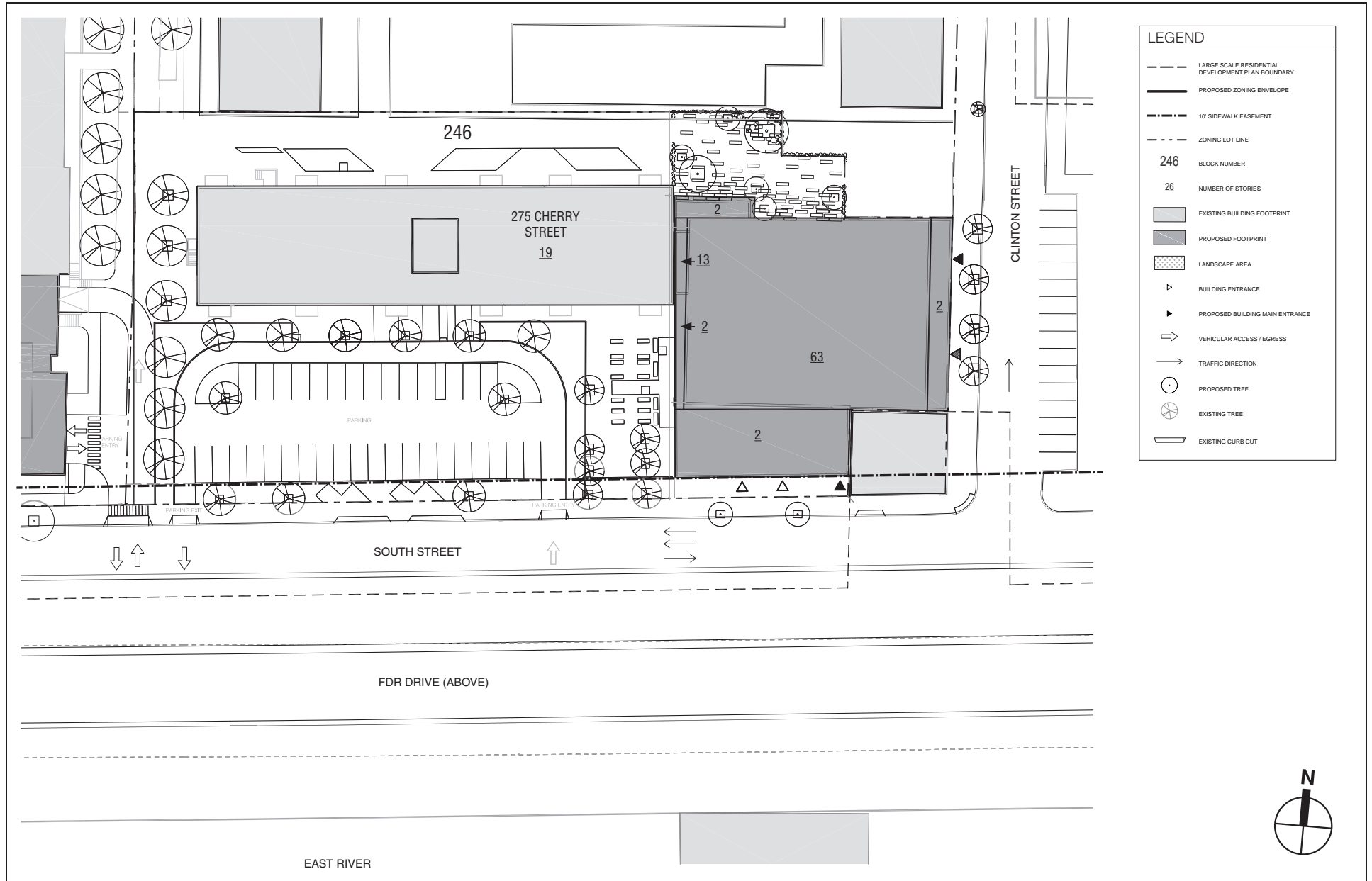
NOTES:
CERTAIN ELEMENTS OF BUILDING DESIGN, SUCH AS THE MAXIMUM BUILDING ENVELOPE, WILL BE CONTROLLED UNDER THE PROPOSED MINOR MODIFICATIONS TO THE TWO BRIDGES LSRD APPROVALS.

OPEN SPACE DELINEATIONS AS SHOWN ARE APPROXIMATE.

Source: Handel Architects, LLP



NOTES:
CERTAIN ELEMENTS OF BUILDING DESIGN, SUCH AS THE MAXIMUM BUILDING ENVELOPE, WILL BE CONTROLLED UNDER THE PROPOSED MINOR MODIFICATIONS TO THE TWO BRIDGES LSRD APPROVALS.



Source: Perkins Eastman

NOTES:
CERTAIN ELEMENTS OF BUILDING DESIGN, SUCH AS THE MAXIMUM BUILDING ENVELOPE, WILL BE CONTROLLED UNDER THE PROPOSED MINOR MODIFICATIONS TO THE TWO BRIDGES LSRD APPROVALS.

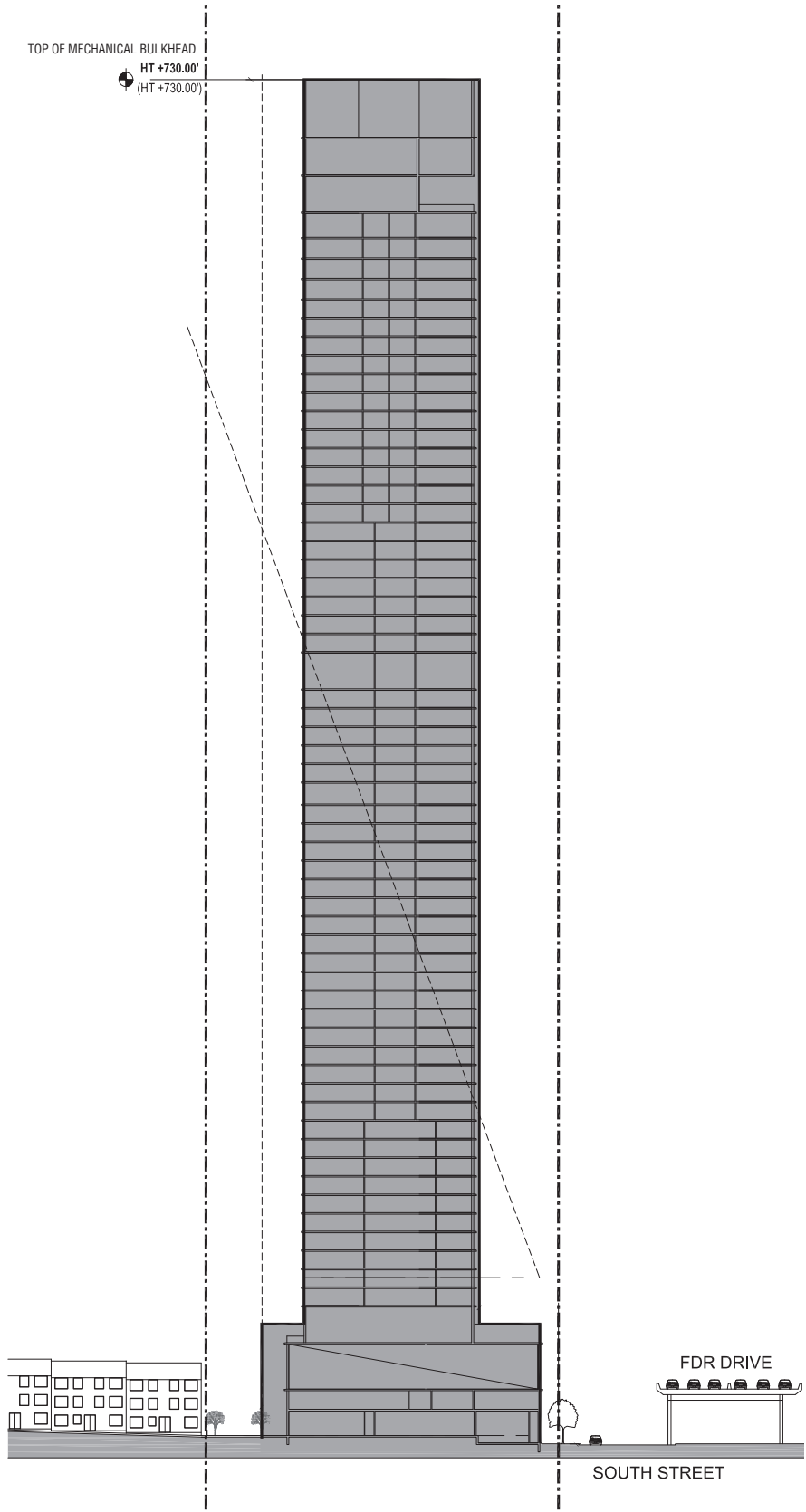
OPEN SPACE DELINEATIONS AS SHOWN ARE APPROXIMATE.

TWO BRIDGES LSRD



Site 6A
Proposed Site Plan
Figure 11

Source: Perkins Eastman



LEGEND	
	ZONING LOT LINE
	MAX DEVELOPMENT ENVELOPE: NEW BUILDING MAY BE LOCATED ANYWHERE WITHIN THE SOLID LINE
	ILLUSTRATIVE BUILDING LINE
	NEW BUILDING

NOTES:
 CERTAIN ELEMENTS OF BUILDING DESIGN, SUCH AS THE MAXIMUM BUILDING ENVELOPE, WILL BE CONTROLLED UNDER THE PROPOSED MINOR MODIFICATIONS TO THE TWO BRIDGES LSRD APPROVALS.

Two Bridges LSRD

Together, the three proposed projects would contain a total of approximately 2,527,727 gsf of new Use Group 2 residential space, approximately 10,858 gsf of Use Group 6 retail space, and approximately 17,028 gsf of community facility space. Based on this gross residential floor area, and assuming a gross floor area of 850 square feet (sf) per residential unit,² the three proposed new buildings would contain a total of up to 2,775 new dwelling units, of which 25 percent or up to 694 units would be designated as permanently affordable,³ including approximately 200 new units of low-income senior housing. The Two Bridges LSRD Approvals would limit the number of new residential units on each site.

The three proposed projects would also contain a total of approximately 22,779 sf of new publicly accessible and private open space. On Site 5, the existing 22,440 sf of private Rutgers Slip Open Space would be enlarged by 11,110 sf, and the total of approximately 33,550 sf (approximately 0.77 acres) would be dedicated as publicly accessible open space. Across the three project sites, a total of approximately 80,020 sf of both publicly accessible and private open space would be altered with new amenities, such as new landscaping, paving, seating, and play areas. The proposed actions would also result in additional resiliency measures at each site, new landscaping, and ground floor retail. No new parking would be created with the proposed projects; however, the existing 103 at-grade parking spaces on Site 5 would be relocated to a below-grade facility in the proposed building on that site.

SITE 4 (4A/4B) PROJECT

With—The proposed project, Site 4 (4A/4B) project would contain approximately 968,409,632,376 gsf of mixed-use, primarily residential development on Lots 15, 70, and 76. The new building, which would occupy portions of Lots 70 and 76, and would cantilever over the existing one-story retail building on Lot 76 (235 Cherry Street) and the 10-story residential building on Lot 70 (80 Rutgers Slip). Portions of the existing 10-story building would be integrated into the new building, including 10 residential units and a community room, and ground floor retail would be introduced into the existing 10-story building's ground floor.) (see **Figures 5 through 8**). Portions of the existing 10-story building would be integrated into the new building, including 10 residential units and a community room, and ground floor retail would be introduced into the existing 10-story building's ground floor. The new building would reach a height of approximately 798 stories (approximately 1,008 feet tall, including mechanical screen) and would provide approximately 617,464,629,944 gsf of residential use (in addition to the remaining 80,799,84,923 gsf of residential use at 80 Rutgers Slip). The new development would contain up to 660 new units (in addition to the 10 units that would be relocated from 80 Rutgers Slip to the new building),⁴ 25 percent of which would be designated as permanently affordable (up to 165

² 850 sf is the area assumed for individual residential units in CEQR analyses; however, the minimum legal size of a residential unit is 640 sf. If larger units are provided, then there would be a smaller number of residential units and affordable residential units.

³ A portion of the affordable units would be made permanently affordable pursuant to the requirements "R10 Program," set forth in Zoning Resolution Sections 23-154(a) and 23-90. The remainder of the affordable units would be made permanently affordable pursuant to Regulatory Agreements with the New York City Department of Housing Preservation and Development (HPD). For purposes herein, permanent or permanently affordable housing shall refer to units made permanently affordable both through the R10 Program and the Regulatory Agreements.

⁴ The Two Bridges LSRD table ~~will~~ would limit the new residential development on Site 4 (4A/4B) to 660 dwelling units, in addition to the 10 units that would be relocated from the existing building.

units). ~~The 10 units relocated from Portions of the existing 80 Rutgers Slip building would be integrated into the new building, including 10 residential units (which would be allocated for senior housing. The). The proposed program is expected to include a community room and ground floor retail, which would be introduced into the existing 10-story building's 80 Rutgers Slip ground floor. The 10 units relocated from 80 Rutgers Slip would be allocated for senior housing. The existing 21-story building located on Lot 15 (82 Rutgers Slip) would remain; the one-story, approximately 11,575-gsf retail building on Lot 76 (235 Cherry Street) would also remain and be re-tenanted (see Figures 4 through 8). An additional approximately 3,124 gsf of retail space would be introduced in the base of the 80 Rutgers Slip building. The overall development on Site 4 (4A/4B) would total approximately 968,409,985,013 gsf, of which approximately 615,217,632,376 gsf would be in addition to existing development. The existing 21-story building located on Lot 15 (82 Rutgers Slip) would remain, and the open space on Lots 15, 70, and 76 would be improved. The existing curb cuts on Rutgers Slip and on Cherry Street would be removed; no new curb cuts would be required. The residential units within the existing buildings at on Lot 70 (80 Rutgers Slip) and Lot 15 (82 Rutgers Slip) would remain affordable, consistent with the existing regulatory agreements governing each building.~~

~~During construction of the proposed project Site 4 (4A/4B) building, the 10 dwelling units at in the 80 Rutgers Slip building that would be relocated removed and replaced in to the new Site 4 (4A/4B) building. An and 9 additional nine dwelling units in the 80 Rutgers Slip building would be renovated. The Site 4 (4A/4B) applicant intends to relocate the approximately 19 It is anticipated that residents living in of these units would be relocated during the construction period to comparable, newly renovated units within the 80 Rutgers Slip building as they become available elsewhere within the building, as other residents leave, or to neighboring buildings, or, if necessary, to units in neighboring buildings. As units in 80 Rutgers Slip become available prior to construction, they would not be re-tenanted, but instead would be renovated and offered as temporary or permanent dwelling units for residents of the relocated or renovated units. There are currently six nine vacant units within the building that would be renovated and made available. Because the 80 Rutgers Slip building is under a U.S. Department of Housing and Urban Development (HUD) regulatory agreement, the dwelling units and residents could only be moved under a relocation plan approved by HUD. Such approval would be granted by HUD and is not part of the proposed actions. To date, such a plan the Site 4 (4A/4B) applicant has been submitted a plan to HUD and approval is pending. The Site 4 (4A/4B) applicant has stated that they would coordinate the project construction to minimize disruptions to these tenants and to ensure that, to the extent possible, residents of these units remain in the building throughout construction. No residents would be permanently displaced from the building Site 4 (4A/4B).~~

~~The proposed Site 4 (4A/4B) project would also provide additional resiliency measures at the site, with physical strategies being designed and implemented around Lot 70 that are intended to protect the existing building at 80 Rutgers Slip and the new building on Site 4 (4A/4B). As shown on the site plan (see Figure 7), new pavers, plantings, and seating would be installed on the existing approximately 15,868 sf (0.36 acres) of private open space on Lots 15, 70, and 76. The existing curb cuts on Rutgers Slip and Cherry Street would be removed, and the existing curb cut on South Street would remain; no new curb cuts would be required.~~

SITE 5 PROJECT

~~The proposed Site 5 project would be an approximately 1,244,960 gsf mixed-use development with two towers on a shared base. The new development, which would be oriented perpendicular to the existing buildings at 265 and 275 Cherry Street and parallel to South Street, would reach a~~

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~~height~~ heights of approximately ~~69~~63 and 70 stories (maximum ~~heights~~ heights of 748 and 798 feet, ~~respectively~~, including mechanical screen) ~~along South Street~~ (see **Figures 4 through 5, 6, 9, and 10**). The proposed project would provide up to 1,350 residential units (average size 850 sf/unit),⁵ 25 percent of which would be designated as permanently affordable (up to 338 units, including approximately 100 new units of low-income senior housing), and approximately 17,028 gsf of community facility use. The project would maintain the 103 surface accessory parking spaces that currently exist on site, relocating these spaces to a garage in the lower level of the proposed building. The proposed project also would enlarge the ground floor retail fronting Cherry Street by approximately ~~5,258~~5,319 gsf, in one-story expansions of the 265 and 275 Cherry Street buildings. The existing buildings (~~633,523~~634,983 gsf residential and ~~2,085~~2,024 gsf retail at 265-275 Cherry Street) would remain. The residential use in those buildings (490 units) would remain affordable, consistent with the long-term regulatory agreement for that development.

~~The Site 5 project also would improve~~enlarge the ~~open space amenities along existing private Rutgers Slip, including Open Space~~ by replacing ~~an existing paved surface parking area between the private open space along Rutgers Slip~~ Open Space and the 265 Cherry Street which is currently ~~occupied by surface parking, and providing new landscaping, seating, and play areas~~building with open space amenities. This area, in addition to the ~~existing private open space along Rutgers Slip and the Open Space between~~, would total approximately 33,550 sf (approximately 0.77 acres) and would be dedicated as publicly accessible open space. New amenities would be installed in the ~~enlarged and reconstructed Rutgers Slip Open Space, would be altered with new amenities, including play equipment, basketball courts, landscaping, walking paths, and seating. In addition, the Site 5 project would enlarge the existing approximately 29,664-sf private open space between the 265 and 275 Cherry Street buildings (the "courtyard area") by approximately 2,649 sf, totaling approximately 32,313 sf (0.74 acres) of private open space. The courtyard area would include new landscaping, seating, and play areas.~~

~~The Site 5 project would provide additional resiliency measures at new building and physical strategies would be employed around the site to assist in protecting the 265 and 275 Cherry Street buildings. Two existing curb cuts north of 265 and 275 Cherry Street would be closed and replaced with a single central curb cut in this area on Cherry and Street. On South Streets would be maintained and Street, two existing curb cuts on South Street would be used to access the resident and visitor drop-off and the lower level parking garage in the new building. Two other existing curb cuts on South Street may be modified. The Jefferson Street walkway curb cuts would be maintained on Cherry and South Streets. No new curb cuts would be required. The new development would be oriented perpendicular to the existing buildings at 265 and 275 Cherry Street and parallel to South Street.~~

SITE 6A PROJECT

The proposed Site 6A project would be an approximately ~~657,868~~672,266 gsf mixed-use development on Lot 5. Based on current plans, the building is expected to reach a height of approximately ~~62-63~~ stories (approximately ~~724~~730 feet tall, including mechanical screen) and would provide up to ~~655,463~~669,851 sf of new residential use, (up to 765 residential units),⁶ 25

⁵ The Two Bridges LSRD table ~~will~~would limit the new residential development on Site 5 to 1,350 dwelling units.

⁶ The Two Bridges LSRD table ~~will~~would limit the new residential development on Site 6A to 765 dwelling units.

percent of which would be designated as permanently affordable (up to 191 units, 100 of which would be new low-income senior housing), as well as approximately 2,506,415 gsf of retail use (see **Figures 4 through 5, 6, 11, and 12**). The proposed actions would also result in additional resiliency measures at the site, including locating critical infrastructure components above flood elevation and implementing physical strategies to assist in protecting the new building. The Site 6A project also would provide approximately 3,200 sf (0.07 acres) of new private open space on site. The existing building and accessory surface parking lot on Lot 1 would remain. The existing curb cuts on South Street would remain; no new curb cuts would be required.

Table 1 summarizes the proposed projects.

B.E. PURPOSE AND NEED OF THE PROPOSED ACTIONS

The goals and objectives of the proposed actions, as intended by the project applicants, are to create up to 2,775 new residential units within Manhattan CD 3, of which 25 percent or up to 694 residential units would be designated as permanently affordable, including approximately 200 new units of low-income senior housing, advancing a City-wide initiative to build and preserve 200,000 affordable units over 10 years in order to support New Yorkers with a range of incomes; provide additional resiliency measures at each site; achieve high quality urban design, architecture, community facility space, and open space elements; enhance the surrounding streetscape and enliven the pedestrian experience, through the creation of new buildings, landscaping, and open space on the project sites, including both new and altered on-site open space (of which 33,550 sf would be dedicated as publicly accessible); add to the retail mix already located in the Two Bridges neighborhood; and strengthen the City's tax base by encouraging development and employment opportunities in the area.

The purpose and need for the minor modifications is described below for each proposed development site. As described above, the Two Bridges LSRD regulates the maximum developable floor area, lot coverage, and other features of development permitted on the LSRD sites. A summary of the previously granted certifications, authorizations, and special permits for sites within the boundaries of the LSRD is attached as Appendix A. To facilitate the proposed projects, require minor modifications to the Two Bridges LSRD Special Permit are being requested from the CPC, as described below. The new mixed use developments on each of the three project sites would be developed as of right under zoning as they would comply with the underlying C6-4 zoning district regulations applicable to the sites under the Zoning Resolution. No new special permits, or authorizations, or certifications, and no use or bulk waivers would be required to facilitate the proposed projects. However, as the project sites are located within the Two Bridges LSRD, minor modifications are required to modify the site plan and zoning calculations of the Two Bridges LSRD to reflect the proposals.

SITE 4 (4A/4B)

The proposed minor modification of the Two Bridges LSRD would facilitate the further development of Site 4 (4A/4B). The proposed minor modification is needed to facilitate the further development of Site 4 (4A/4B) with new permanently affordable and market-rate housing; up to 660 new residential units in total would be provided, with 25 percent designated as permanently affordable (up to 165 units). (In addition, 10 units would be relocated from 80 Rutgers Slip to the new building and would be allocated for senior housing.) The It is the Site 4 (4A/4B) applicant's intention that the proposed actions would allow for the Site 4 (4A/4B) development to provide substantial capital to two non-profit organizations in support of their on-going efforts to provide,

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support, and maintain affordable housing for New Yorkers. The Site 4 (4A/4B) development also would ~~enhance~~change the streetscape and pedestrian environment ~~by improving~~with the installation of new pavers, plantings, and seating at the existing approximately 15,868 sf (0.36 acres) of private open space areas located on Lots 15, 70, and 76, and would ~~strengthen~~provide additional local retail opportunities by increasing the ground floor retail at this site. The proposed actions would ~~improve~~the also result in additional resiliency ~~of measures at~~ the site, with physical strategies being implemented around Lot 70 of Site 4 (4A/4B) to ~~assist in protecting~~protect the existing building at 80 Rutgers Slip and the new building on Site 4 (4A/4B).

SITE 5

The proposed minor modification of the Two Bridges LSRD would facilitate the further development of Site 5 by replacing a surface parking lot with new permanently affordable and market-rate housing, community facility space, and retail. The new Site 5 development would provide up to 1,350 new units, 25 percent of which would be designated as permanently affordable (up to 338 units). In addition, the proposed Site 5 project would help address the continuing need for independent living facilities for seniors in New York City, by creating ~~at least~~approximately 100 new units of low-income senior housing as part of the permanently affordable housing to be provided on that site. With the proposed minor modification, the proposed development also would ~~significantly improve~~enlarge the private Rutgers Slip ~~Open Space~~ on Site 5, ~~by providing new landscaping, seating, and play areas in the~~ to approximately 33,550 sf (approximately 0.77 acres). The Rutgers Slip Open Space, which would be dedicated as publicly accessible, would include play equipment, basketball courts, walking paths, and seating. The Site 5 project would also enlarge the existing private open space between 265 and 275 Cherry Street and would provide new amenities, including new landscaping, seating, and play areas. The changes to the Rutgers Slip Open Space would be experienced by pedestrians along Rutgers Slip. ~~The open space improvements along Rutgers Slip would enhance pedestrian access accessing the East River waterfront from the upland neighborhood to the East River waterfront, and~~ In addition, local retail opportunities would be ~~enhanced by~~altered with the creation of additional ground-floor retail at 265 and 275 Cherry Street. The proposed ~~action also~~actions would ~~improve the site's~~also result in additional resiliency ~~by~~measures at Site 5, including elevating the first floor of the new building above the flood plain elevation, and employing physical strategies around the site to assist in protecting the 265 and 275 Cherry Street buildings.

SITE 6A

The proposed minor modification of the Two Bridges LSRD would facilitate the further development of Site 6A with new permanently affordable and market-rate housing. The new Site 6A development would provide up to 765 new units in total, with 25 percent designated as permanently affordable (up to 191 units). In addition, the proposed Site 6A project would help address the continuing need for independent living facilities for seniors in New York City, by creating approximately 100 new units of low-income senior housing as part of the permanently affordable housing to be provided on that site. With the proposed minor modification, new development would replace a vacant lot and ~~introduce~~provide new ground floor retail ~~that would enhance~~to the streetscape and pedestrian environment along Clinton and South Streets ~~and strengthen~~that would add to local retail opportunities. The proposed ~~action also~~actions would ~~improve the~~also result in additional resiliency ~~of measures at~~ the site ~~and~~, including locating critical infrastructure components above flood elevation and implementing physical strategies to assist in protecting the new building. The proposed Site 6A development also would create ~~new~~approximately 3,200 sf (0.07 acres) of new private open space on site Site 6A.

F. ANALYSIS FRAMEWORK

The 2014 *CEQR Technical Manual* will serve as a general guide on the methodologies and impact criteria for evaluating the proposed projects' potential effects on the various environmental areas of analysis. In disclosing impacts, the EIS will consider the proposed projects' potential adverse impacts on its environmental setting. A future build year of 2021 will be examined to assess the potential impacts of the proposed actions. Consequently, the environmental setting is not the current environment, but the future environment. Therefore, the technical analyses and consideration of alternatives include descriptions of existing conditions, conditions in the future without the proposed projects (the No Action scenario), and conditions in the future with the proposed projects (the With Action scenario). The incremental difference between the No Action and With Action conditions is analyzed to determine the potential environmental effects of the proposed projects. In order to understand how the cumulative impacts of the proposed projects might change if one or more of the projects is delayed indefinitely or ultimately not pursued, the EIS will also provide a qualitative analysis of certain permutations in a separate chapter, "Project Permutations." ~~The analysis will be limited to evaluating specific locations or facilities for which impacts and mitigation needs have been identified under the cumulative impact analysis of all three projects. The assessments for the relevant technical areas will be targeted to focus on those impacts.~~

BUILD YEAR

The proposed projects each would be developed in a single phase; the construction period for each is anticipated to be between 30 and 36 months. Therefore, a future build year of 2021, when the projects are anticipated to be complete and operational, will be examined in the EIS to assess the potential impacts of the proposed actions.

EXISTING CONDITIONS

For each technical area to be assessed in the EIS, the existing conditions on the project sites and in the relevant study areas will be described. The analysis framework begins with an assessment of existing conditions because these can be most directly measured and observed. The assessment of existing conditions does not represent the condition against which the proposed actions are measured, but serves as a starting point for the projection of future conditions with and without the proposed actions and the analysis of potential impacts.

NO ACTION SCENARIO

For the No Action scenario, it is assumed that the project sites would continue in their existing conditions ~~and that~~, including the Rutgers Slip Open Space on Site 5 remaining private open space, ~~and that the~~ The existing retail in the Lot 76 building (235 Cherry Street) on Site 4 (4A/4B) would be re-tenanted. No new development would occur on the project sites. **Table 2** summarizes the No Action conditions for the three project sites.

No Build projects anticipated to be complete by 2021 in the study areas are considered in the various technical analyses presented in this EIS.

**Table 2
No Action Scenario**

Use (GSF)	Site 4 (4A/4B)¹	Site 5	Site 6A	Total New
Use Group 2 (Residential)	Existing: 313,510 gsf New: 0	Existing: 633,523 <u>634,983</u> gsf New: 0	Existing: 262,877 gsf New: 0	0
Residential Units	Existing: 307 DUs New: 0	Existing: 490 DUs New: 0	Existing: 256 DUs New: 0	0
<i>Affordable Unit Count</i>	Existing: 307 DUs New: 0	Existing: 490 DUs New: 0	Existing: <u>128 DUs</u> New: 0	0
Use Group 6 (Retail)	Existing: 11,575 gsf (retenanted) New: 0	Existing: 2,085 <u>2,024</u> gsf New: 0	Existing: 0 New: 0	0
Community Facility	Existing: 27,552 gsf New: 0	Existing: 0 New: 0	Existing: 0 New: 0	0
Accessory Parking	Existing: 15 New: 0	Existing: 103 at grade New: 0	Existing: 3534 <u>3534</u> at grade New: 0	0
Private Open Space	Existing: 15,868 sf New: 0	Existing: 64,152 sf New: 0	Existing: 0 New: 0	0
Vacant	Existing: 0 New: 0	Existing: 0 New: 0	Existing: 20,177 sf New: 0	0

Notes:

¹ 80 Rutgers Slip/Lot 70: 85,615 gsf [109 units] residential, 3,928 sf open space, and 4 surface parking spaces; 82 Rutgers Slip/Lot 15: 227,895 gsf residential [198 units], 27,552 gsf community facility, 11 accessory enclosed parking spaces, and 11,660 sf open space; 235 Cherry Street/Lot 76: 11,575 gsf retail and 280 sf open space.

Table 2A
Site 4 (Site 4A/4B)

Land Use	EXISTING CONDITION	NO-ACTION CONDITION	WITH-ACTION CONDITION	INCREMENT
Residential	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, specify the following				
Describe type of residential structures	Lot 15: 1 21-story building Lot 70: 1 10-story building Lot 76: N/A	Lot 15: 1 21-story building (remaining) Lot 70: 1 10-story building (remaining) Lot 76: N/A	Lot 15: 1 21-story building (remaining) Lot 70: 1 10-story building (remaining) Lots 70 & 76 combined: 1 7980-story building (new) ⁷	+7980 floors
No. of dwelling units	Lot 15: 198 DUs Lot 70: 109 DUs Lot 76: N/A	Lot 15: 198 DUs (remaining) Lot 70: 109 DUs (remaining) Lot 76: N/A	Lot 15: 198 DUs (remaining) Lot 70: 99 DUs (remaining) Lots 70 & 76 combined: + approx. 670 DUs (new ⁸)	+approx. 660 DUs
No. of low- to moderate-income units	Lot 15: 198 Lot 70: 109 Lot 76: N/A	Lot 15: 198 (remaining) Lot 70: 109 (remaining) Lot 76: N/A	Lot 15: 198 (remaining) Lot 70: 99 (remaining) Lots 70 & 76 combined: + approx. 175 DUs (new, including 10 relocated DUs)	+approx. 165 DUs
Gross Floor Area (sq. ft.)	Lot 15: 227,895 gsf Lot 70: 85,615 gsf Lot 76: N/A	Lot 15: 227,895 gsf (remaining) Lot 70: 85,615 gsf (remaining) Lot 76: N/A	Lot 15: 227,895 gsf (remaining) Lot 70: 80,79984,923 gsf (remaining) Lots 70 & 76 combined: 647,464629,944 gsf (new)	+645,247629,252 gsf
Commercial	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, specify the following:				
Describe type of office, retail, other	Lot 15: N/A Lot 70: N/A Lot 76: 1 1-story partially vacant retail building	Lot 15: N/A Lot 70: N/A Lot 76: Re-tenant 1-story building with retail (remaining)	Lot 15: N/A Lot 70: Retail Lots 70 & 76 combined: Re-tenant 1-story building with retail (remaining)	
Gross floor area (sq. ft.)	Lot 15: N/A Lot 70: N/A Lot 76: 11,575 gsf	Lot 15: N/A Lot 70: N/A Lot 76: 11,575 gsf (remaining)	Lot 15: N/A Lot 70: 3,124 gsf (new) Lots 70 & 76 combined: 11,575 gsf (remaining)	+3,124
Manufacturing/Industrial	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If yes, specify the following:				
Type of use				
Gross floor area (sq. ft.)				
Open storage area (sq. ft.)				
If any unenclosed activities, specify				
Community Facility	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, specify the following				
Type	Lot 15: Medical offices, daycare center	No change	No change	No change
Gross floor area (sq. ft.)	Lot 15: 27,552 gsf	No change	No change	No change
Vacant Land	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If yes, describe				
Other Land Uses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, describe	Lot 15: approx. 11,660 sf open space Lot 70: approx. 3,928 sf open space Lot 76: approx. 280 sf open space	No change	Lots 15/70: ImprovementsAlterations to existing open space Lot 76: No change	No change
Parking				
Garages	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, specify the following:				
No. of public spaces				
No. of accessory spaces	Lot 15: 11	No change	No change	No change
Lots	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If yes, specify the following:				
No. of public spaces	0	No change	No change	No change
No. of accessory spaces	Lot 70: 4 Lot 76: 0	No change	Lots 70/76: No parking spaces are required and none would be provided.	(4) accessory spaces

⁷ Portion of 10-story building (remaining) would be incorporated into the proposed building.

⁸ 670 DUs includes the 10 units to be relocated from the existing Lot 70 building.

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Table 2A (cont'd)
Site 4 (Site 4A/4B)

	EXISTING CONDITION	NO-ACTION CONDITION	WITH-ACTION CONDITION	INCREMENT
Population				
Residents	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If "yes", specify number	Approx. 660	No change	Approx. 2,079 2,073	1,419
Briefly explain how the number of residents was calculated	Average household size of 2.15 from Manhattan Community District 3 Profile (Sources: U.S. Census Bureau, 2000 and 2010 Censuses SF1 Population Division - NYC Department of City Planning [Dec 2011]). Average household size of 1.5 assumed for senior units under With Action Condition.			
Businesses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If "yes", specify the following:				
No. and type	TBD/Retail, community facility	No change	TBD/Retail, community facility	
No. and type of workers by business	Approx. 35 retail, 28 community facility	No change	Approx. 45 retail, 28 community facility	10 retail
No. and type of non-residents who are not workers	TBD	No change	TBD	TBD
Briefly explain how the number of businesses was calculated	Retail including dining: 333 sf/employee. Community facility: 1,000 sf/employee.			
Other (students, visitors, concert-goers, etc.)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If any, specify number				
Briefly explain how the number was calculated				
Zoning				
Zoning classification	C6-4	No change	No change	No change
Maximum amount of floor area that can be developed	69,210 sf x 10.0 FAR = 692,100 sf 12.0 FAR = 830,520 sf	No change	No change	No change
Predominant land use and zoning classifications within land use study areas or a 400-foot radius of proposed project	Residential, commercial, transportation/utility, open space, C6-4, M1-4, R7-2	No change	No change	No change

Table 2B
Site 5

Land Use	EXISTING CONDITION	NO- ACTION CONDITION	WITH- ACTION CONDITION	INCREMENT
Residential	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, specify the following				
Describe type of residential structures	Lot 1: 2 26-story buildings	Lot 1: 2 26-story buildings (remaining)	Lot 1: 2 26-story buildings (remaining) Lots 1/2: 1 626 ⁹ -story tower, 1 697 ⁹ -story tower, with shared base ⁹ (new)	Lots 1/2: +63 and 7069 floors
No. of dwelling units	Lot 1: 490 DUs	Lot 1: 490 DUs (remaining)	Lot 1: 490 DUs (remaining) Lots 1/2: 1,350 DUs (new)	Lots 1/2: + approx. 1,350 DUs
No. of low- to moderate-income units	Lot 1: 490 DUs	Lot 1: 490 DUs (remaining)	Lot 1: 490 DUs (remaining) Lots 1/2: Approx. 338 DUs (new)	Lots 1/2: + approx. 338 DUs
Gross Floor Area (sq. ft.)	Lot 1: 633,523,634,983 gsf ¹⁰	Lot 1: 633,523,634,983 gsf (remaining)	Lot 1: 633,523,634,983 gsf (remaining) Lots 1/2: 1,227,932 gsf (new)	Lots 1/2: +approx.1,227,932 gsf
Commercial	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, specify the following:				
Describe type (retail, office, other)	Lot 1: Retail in 265 Cherry Street	Lot 1: No change	Lot 1: Retail	Retail
Gross floor area (sq. ft.)	Lot 1: 2,085,024 gsf ³	Lot 1: No change	Lot 1: 2,085,024 gsf (remaining) 5,2585,319 gsf (new)	Lot 1: +5,2585,319 gsf
Manufacturing/Industrial	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If yes, specify the following:				
Type of use				
Gross floor area (sq. ft.)				
Open storage area (sq. ft.)				
If any unenclosed activities, specify				
Community Facility	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, specify the following				
Type	Lot 1: 1 non-profit community development corporation in 275 Cherry Street	Lot 1: No change	Lot 1: No change Lots 1/2: General community facility use	
Gross floor area (sq. ft.)	0	0	Lot 1: No change Lots 1/2: 17,028 gsf	Lots 1/2: +17,028 gsf
Vacant Land	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If yes, describe				
Other Land Uses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, describe	Lots 1/2: Approx. 64,152 sf private playgrounds, landscaped areas, and seating areas	Lots 1/2: No change	Lots 1/2: <u>Approx. 64,152 sf (total remaining); approx. 19,579 sf open space (total new), including 11,110 sf new publicly accessible open space and 2,649 sf new private open space; TOTAL dedicated publicly accessible open space 33,550 sf (includes 22,440 sf of altered/remaining + 11,110 sf new)</u>	Lots 1/2: +19,579 sf (new); +33,550 sf (total dedicated publicly accessible open space, including new and altered existing open space)

⁹ Anticipated number of floors, to a maximum height of 798’.

¹⁰ Existing residential floor area is based on a calculation by Handel Architects dated February 22, 2016, June, 2018 and represents an update from the figures presented in the Two Bridges (HealthCare Chaplaincy) EAS.

Table 2B (cont'd)
Site 5

	EXISTING CONDITION	NO-ACTION CONDITION	WITH-ACTION CONDITION	INCREMENT
Parking				
Garages	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If "yes", specify the following:				
No. of public spaces	0	No change	No change	0
No. of accessory spaces	0	0	Lots 1/2: 103	Lots 1/2: +103
Lots	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If "yes", specify the following:				
No. of public spaces	0	No change	No change	0
No. of accessory spaces	Lots 1/2: 103	No change	0	Lots 1/2: (103)
Population				
Residents	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If "yes", specify number	Approx. 1,054	No change	Approx. 3,891	2,838
Briefly explain how the number of residents was calculated	Average household size of 2.15 from Manhattan Community District 3 Profile (Sources: U.S. Census Bureau, 2000 and 2010 Censuses SF1 Population Division - NYC Department of City Planning [Dec 2011]). Average household size of 1.5 assumed for senior units under With Action Condition.			
Businesses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If "yes", specify the following:				
No. and type	TBD1/retail	No change	TBD/retail, community facility	TBD
No. and type of workers by business	Approx. 6	No change	Approx. 22 retail/Approx. 17 community facility	16 retail, 17 community facility
No. and type of non-residents who are not workers	TBD	No change	TBD	TBD
Briefly explain how the number of businesses was calculated	Retail including dining: 333 sf/employee. Community facility: 1,000 sf/employee.			
Other (students, visitors, concert-goers, etc.)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If any, specify number				
Briefly explain how the number was calculated				
Zoning				
Zoning classification	C6-4	No change	No change	No change
Maximum amount of floor area that can be developed	145,031 sf x 10.0 FAR = 1,450,310 sf 12.0 FAR = 1,740,372 sf	No change	No change	No change
Predominant land use and zoning classifications within land use study areas or a 400-foot radius of proposed project	Residential, commercial, transportation/utility, open space, C6-4, M1-4, R7-2	No change	No change	No change

Table 2C
Site 6A

	EXISTING CONDITION	NO-ACTION CONDITION	WITH-ACTION CONDITION	INCREMENT
Land Use				
Residential	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If yes, specify the following:				
Describe type of residential structures	Lot 1: 1 19-story building Lot 5: N/A	No change	Lot 1: No change Lot 5: 1 6263-story building	Lot 5: 1 6263-story building
No. of dwelling units	Lot 1: 256 Lot 5: N/A	No change	Lot 1: No change Lot 5: 765	Lot 5: +765
No. of low- to moderate-income units	Lot 1: 128 Lot 5: N/A	No change	Lot 1: No change Lot 5: 191	Lot 5: +191
Gross Floor Area (sq. ft.)	Lot 1: 262,877 gsf	No change	Lot 1: No change Lot 5: 655,463,669,851 gsf	Lot 5: +655,463,669,851 gsf
Commercial				
If yes, specify the following:				
Describe type (retail, office, other)			Lot 5: Retail	Retail
Gross floor area (sq. ft.)			Lot 5: 2,5062,415 gsf	Lot 5: +2,5062,415 gsf
Manufacturing/Industrial				
If yes, specify the following:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Type of use				
Gross floor area (sq. ft.)				
Open storage area (sq. ft.)				
If any unenclosed activities, specify				
Community Facility				
If yes, specify the following:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Type				
Gross floor area (sq. ft.)				
Vacant Land				
If yes, describe	Lot 5: Approximately 20,177-sf paved undeveloped site	Lot 5: No change		
Other Land Uses				
If yes, describe	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Lot 5: 3,200 sf private open space (new) Lot 5: +3,200 sf
Parking				
Garages				
If yes, specify the following:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
No. of public spaces				
No. of accessory spaces				
Lots				
If yes, specify the following:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
No. of public spaces	Lot 1: 0	Lot 1: No change	Lot 1: No change	Lot 1: No change
No. of accessory spaces	Lot 1: 3534	Lot 1: No change	Lot 1: No change	Lot 1: No change
Population				
Residents	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If "yes", specify number	Approx. 542	No change	Approx. 2,122	1,580
Briefly explain how the number of residents was calculated	Average household size of 2.15 from Manhattan Community District 3 Profile (Sources: U.S. Census Bureau, 2000 and 2010 Censuses SF1 Population Division - NYC Department of City Planning [Dec 2011]). Average household size of 1.5 assumed for senior units under With Action Condition.			
Businesses				
If "yes", specify the following:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
No. and type			TBD/retail	
No. and type of workers by business	0	0	Approx. 8	8
No. and type of non-residents who are not workers	TBD	TBD	TBD	TBD
Briefly explain how the number of businesses was calculated	Retail including dining: 333 sf/employee.			
Other (students, visitors, concert-goers, etc.)				
If any, specify number	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Briefly explain how the number was calculated				
Zoning				
Zoning classification	C6-4			
Maximum amount of floor area that can be developed	The maximum amount of floor area that can be developed on the site today as per the <u>Two Bridges</u> LSRD is 262,877 sf, which is the zfa of the existing building.	No change	856,284 sf (71,357 sf (combined area of Lots 1 and 5 [71,357 sf] x 12.0 FAR) minus 262,587 sf (existing building on Lot 1) = 593,697,593,407 sf	No change
Predominant land use and zoning classifications within land use study areas or a 400-foot radius of proposed project	Residential, commercial, transportation/utility, open space, C6-4, M1-4, R7-2	No change	No change	No change

**Table 2D
Incremental Increases for Each Project Site**

	SITE 4 (4A/4B)—INCREMENT	SITE 5—INCREMENT	SITE 6A—INCREMENT
Land Use			
Residential	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If yes, specify the following:			
Describe type of residential structures	+7980 floors	Lots 1/2: +69-63 and 70 floors	Lot 5: ±63 floors 4-62-story building
No. of dwelling units	+up to 660 DUs	Lots 1/2: +up to 1,350 DUs	Lot 5: +up to 765 DUs
No. of low- to moderate-income units	+up to 165 DUs	Lots 1/2: +up to 338 DUs	Lot 5: + up to 191 DUs
Gross Floor Area (sq. ft.)	+615,247,629,252 gsf	Lots 1/2: +1,227,932 gsf	Lot 1: No change Lot 5: +655,463,669,851 gsf
Commercial	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If yes, specify the following:			
Describe type (retail, office, other)	N/A	Retail	Retail
Gross floor area (sq. ft.)	+3,124 gsf	Lot 1: +5,2585,319 gsf	Lot 5: +2,5062,415 gsf
Manufacturing/Industrial	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, specify the following:			
Type of use			
Gross floor area (sq. ft.)			
Open storage area (sq. ft.)			
If any unenclosed activities, specify			
Community Facility	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, specify the following:			
Type	No change	Lot 1: No change Lots 1/2: General community facility use	N/A
Gross floor area (sq. ft.)	No change	Lots 1/2: +17,028 gsf	N/A
Vacant Land	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, describe			
Other Land Uses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If yes, describe	Lot 76: No change	Lots 1/2: 19,579 gsf private open space (new); + 33,550 sf (total dedicated publicly accessible open space, including new and altered existing open space)	Lot 5: 3,200 sf private open space (new)
Parking			
Garages	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, specify the following:			
No. of public spaces	N/A	0 (No change)	N/A
No. of accessory spaces	No change	Lot 2: +103	N/A
Lots	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If yes, specify the following:			
No. of public spaces	No change	0 (No change)	Lot 1: No change
No. of accessory spaces	(4) accessory spaces	Lot 2: (103)	Lot 1: No change
Population			
Residents	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If "yes", specify number			
Briefly explain how the number of residents was calculated	Average household size of 2.15 from Manhattan Community District 3 Profile (Sources: U.S. Census Bureau, 2000 and 2010 Censuses SF1 Population Division - NYC Department of City Planning [Dec 2011]). Average household size of 1.5 assumed for senior units under With Action Condition.		
Businesses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If "yes", specify the following:			
No. and type	TBD/retail, community facility	No change	TBD/retail, community facility
No. and type of workers by business	Approx. 4210 retail, 28 community facility	No change Approx. 16 retail, 17 community facility	Approx. 748 retail, 45 community facility
No. and type of non-residents who are not workers	TBD	TBD	TBD
Briefly explain how the number of businesses was calculated	Retail including dining: 333 sf/employee. Community facility: 1,000 sf/employee.		
Other (students, visitors, concert-goers, etc.)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If any, specify number			
Briefly explain how the number was calculated			
Zoning			
Zoning classification	C6-4		
Maximum amount of floor area that can be developed	-No change	-No change	-No change
Predominant land use and zoning classifications within land use study areas or a 400-foot radius of proposed project	-No change	No change	No change

WITH ACTION SCENARIO

In the With Action scenario, the proposed projects described in Section I above would be constructed on the project sites: (see Tables 2A through 2D).

It is assumed that, in addition to modifying the amount of floor area, number of dwelling units, lot coverage, and open space available to the project sites under the Two Bridges LSRD, the minor modifications to the Two Bridges LSRD Approvals would also establish building envelope and site plan controls for each project. Because the Two Bridges LSRD site plans will provide controls with respect to the maximum building envelopes and development programs, ~~the analysis~~ this EIS will assume the details of the proposed programs and designs as the reasonable worst-case development scenario.

ANALYSIS OF PROJECT PERMUTATIONS

Where significant adverse impacts and mitigation needs are identified in the EIS under the cumulative impact analysis of all three projects, further detail will be provided to identify mitigation requirements for each project. In order to understand how the cumulative impacts of the proposed projects might change if one or more of the projects is delayed indefinitely or ultimately not pursued, the EIS will also provide a qualitative analysis of such permutations in a separate chapter—"Project Permutations." The analysis will be limited to the evaluation of specific locations or facilities for which impacts and mitigation needs have been identified under the cumulative impact analysis of all three projects. The assessments for the relevant technical areas will be targeted to focus on those impacted areas.

G. CITY ENVIRONMENTAL QUALITY REVIEW

CEQR OVERVIEW

New York City has formulated an environmental review process, CEQR, pursuant to ~~the State Environmental Quality Review Act (SEQRA)~~ and its implementing regulations (Part 617 of 6 New York Codes, Rules and Regulations). The City's CEQR rules are found in Executive Order 91 of 1977 and subsequent rules and procedures adopted in 1991 (62 Rules of the City of New York, Chapter 5). CEQR's mandate is to assure that governmental agencies undertaking actions within their discretion take a "hard look" at the environmental consequences of each of those actions so that all potential significant environmental impacts of each action are fully disclosed, alternatives that reduce or eliminate such impacts are considered, and appropriate, practicable measures to reduce or eliminate such impacts are adopted.

The CEQR process begins with selection of a "lead agency" for the review. The lead agency is generally the governmental agency which is most responsible for the decisions to be made on a proposed action and which is also capable of conducting the environmental review. For the proposed Two Bridges LSRD projects, the Department of City Planning (DCP), acting on behalf of CPC, is the CEQR lead agency.

DCP, after reviewing the Environmental Assessment Statement (EAS), has determined that the proposed projects have the potential for significant adverse environmental impacts and that an EIS must be prepared. A public scoping of the content and technical analysis of the EIS is the first step in its preparation, as described below. Following completion of scoping, the lead agency oversees preparation of a ~~draft EIS (DEIS)~~ for public review.

DCP and CPC will hold a public hearing during the Commission's period for consideration of the application. That hearing record is held open for 10 days following the open public session, at which time the public review of the DEIS ends. The lead agency then oversees preparation of a final EIS (FEIS), which incorporates all relevant comments made during public review of the DEIS. The FEIS is the document that forms the basis of CEQR Findings, which the lead agency and each involved agency (if applicable) must make before taking any action within its discretion on the proposed actions.

COMMUNITY OUTREACH MEETINGS

Prior to the public scoping meeting and DEIS hearing, three community outreach meetings were held regarding the environmental review process. A fourth meeting ~~will be~~was held between the scoping meeting and the certification of the DEIS. Though these community outreach meetings are not required under CEQR, the three ~~development teams~~project applicants have committed to providing additional opportunities during the environmental review process to gain insight and input from the community and to establish strategies for working with the community through the planning and design stages of the three proposed projects.

SCOPING

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the proposed actions. The process at the same time allows other agencies and the public a voice in framing the scope of the EIS. During the period for scoping, those interested in reviewing the draft EIS scope may do so and give their comments in writing to the lead agency or at the public scoping meeting.

A public scoping meeting for the proposed projects was held on May 25, 2017 at 2 pm and 6 pm, at the Manhattan Municipal Building, 1 Centre Street. The period for comments on the Draft Scope of Work ~~will remain open for 10 days following the meeting~~remained opened until the close of business on June 8, 2017, at which point the scope review process ~~will be~~was closed. The lead agency ~~will then oversee~~oversaw preparation of ~~athis~~this Final Scope of Work, which incorporates all relevant comments made on the scope and revises the extent or methodologies of the studies, as appropriate, in response to comments made during scoping. The DEIS will be prepared in accordance with ~~the~~this Final Scope of Work.

C.H. PROPOSED SCOPE OF THE ENVIRONMENTAL IMPACT STATEMENT

The scope of the EIS will conform to all applicable laws and regulations and will follow the guidance of the *CEQR Technical Manual*.

The EIS will contain:

- A description of the proposed projects and the environmental setting;
- A statement of the environmental impacts of the proposed actions, including short- and long-term effects, and typical associated environmental effects;
- An identification of any adverse environmental effects that cannot be avoided if the proposed actions are implemented;
- A discussion of reasonable alternatives to the proposed actions;

- An identification of any irreversible and irretrievable commitments of resources that would be involved if the proposed project is built; and
- A description of mitigation measures proposed to minimize or fully mitigate any significant adverse environmental impacts.

The analyses for the proposed actions will be performed for the year that the proposed projects will be substantially operational, which is 2021. The No Action future baseline condition to be analyzed in all technical chapters will assume that absent the proposed actions, the project sites would continue in their existing conditions and that the existing retail in the Lot 76 building on Site 4 (4A/4B) would be re-tenanted.

In order to understand how the cumulative impacts of the proposed projects might change if one or more of the projects is delayed indefinitely or ultimately not pursued, the EIS will also provide an analysis of certain permutations in a separate chapter. The analysis will be limited to evaluating specific locations or facilities for which impacts and mitigation needs have been identified under the cumulative impact analysis of all three projects. The assessments for the relevant technical areas will be targeted to focus on those impacts.

Below is a description of the environmental categories in the *CEQR Technical Manual* that will be analyzed in the EIS and a description of the tasks to be undertaken. For all environmental categories discussed below, the EIS tasks will include consideration of relevant information obtained in the three community outreach meetings conducted by the project teams applicants prior to scoping, as described above.

TASK 1: PROJECT DESCRIPTION

This chapter introduces the reader to the proposed projects and sets the context in which to assess impacts. The chapter gives the public and decision-makers a baseline to compare the With Action scenario, the No Action scenario, and any alternative options, as appropriate.

The chapter will contain a brief history of the uses on the project sites; a statement of the purpose and need for the proposed actions; a detailed description of the proposed projects; and a discussion of the procedures to be followed and the role of the EIS in the process. The chapter will also describe the analytic framework for the EIS and provide screening analyses for technical areas that do not require a detailed analysis.

The project description will include a discussion of key project elements, such as site plans and elevations, access and circulation, and other project features. The section on required approvals will describe all public actions required to develop the projects. The role, if any, of any other public agency in the approval process will also be described. The role of the EIS as a full disclosure document to aid in decision-making will be identified and its relationship to any other approval procedures will be described. The nature of the cumulative impact analysis undertaken under the EIS will also be described.

TASK 2: LAND USE, ZONING, AND PUBLIC POLICY

The proposed projects ~~are understood to~~ require minor modifications of the Two Bridges LRSD. Therefore, the EIS will include an assessment of the proposed actions' consistency with land use, zoning, and public policy, in accordance with the *CEQR Technical Manual*.

~~A~~Under CEQR, a land use analysis characterizes the uses and development trends in the area that may be affected by a proposed project. The analysis also considers the project's compliance with

Two Bridges LSRD

and effect on the area's zoning and other applicable public policies. That assessment, which provides a baseline for other analyses, will consist of the following tasks:

- Provide a brief development history of the project sites and study area. The study area will include the area within approximately ¼-mile of the boundaries of the Two Bridges LSRD.
- Based on existing studies, information included in existing geographic information systems (GIS) databases for the area and field surveys, identify, describe, and graphically present predominant land use patterns and site utilization on the project sites and in the study area. Recent land use trends and major factors influencing land use trends will be described.
- Describe and map existing zoning and any recent zoning actions on the project sites and in the ¼-mile study area.
- Summarize other public policies that may apply to the project sites and study area, including any formal neighborhood or community plans and the City's Comprehensive Waterfront Plan.
- Prepare a list of other projects expected to be built in the study area that would be completed before or concurrent with the proposed projects (No Action projects). Describe the effects of these projects on land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study area, including plans for public improvements.
- Describe the proposed actions and provide an assessment of the impacts of the proposed actions on land use and land use trends, zoning, and public policy. Consider the effects related to issues of compatibility with surrounding land use, consistency with zoning and other public policy initiatives, and the effect of the projects on development trends and conditions in the area.
- Since the project sites are located in the Coastal Zone, an assessment of the projects' consistency with the Waterfront Revitalization Program (WRP) also will be prepared. This includes the preparation of a WRP Consistency Assessment Form (CAF). The WRP CAF will address in part the proposals flood resiliency, both to current flood hazards and to future flood hazards, with sea level rise and climate change.

TASK 3: SOCIOECONOMIC CONDITIONS

The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area. This chapter will assess the proposed actions' potential effects on the socioeconomic character of the surrounding area.

According to the *CEQR Technical Manual*, the five principal issues of concern with respect to socioeconomic conditions are whether a proposed action would result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on a specific industry.

~~The~~Based on CEQR Technical Manual guideline thresholds, the proposed projects ~~would~~ not result in any have the potential to alter the socioeconomic character of the neighborhood due to direct residential or business displacement. For Site 4(4A/4B), in preparation for the An assessment

of direct residential displacement is warranted under CEQR if a proposed project, the 10 units at would displace more than 500 residents. On Site 4 (4A/4B), there are 10 DUs that would be removed from the 80 Rutgers Slip that would be relocated to building and replaced in the new Site 4 (4A/4B) building. An additional nine DUs in the 80 Rutgers Slip building would be vacated. This would occur (i) as existing residents leave the 10 units, or (ii) by moving renovated. The Site 4 (4A/4B) applicant intends to relocate the approximately 19 residents of living in these units to other units that during the construction period to comparable, newly renovated units in the building as they become available in the building or in a nearby building. No, or, if necessary, to units in neighboring buildings. Because the 80 Rutgers Slip building is under a HUD regulatory agreement, the DUs and residents could only be moved under a relocation plan approved by HUD. Such approval would be granted by HUD and is not part of the proposed actions.

Irrespective of the applicant's ability and requirement to provide replacement units for the residents of these 19 DUs within the building, this level of potential direct displacement would be less than the 500-resident threshold warranting assessment under CEQR. The EIS will include a description of relocation plans for residents of 80 Rutgers Slip who may be temporarily or permanently displaced from the building. With their current housing units as a result of the proposed projects.

Similar to direct residential displacement, the proposed projects do not have the potential to alter the socioeconomic character of the neighborhood due to direct business displacement. According to the *CEQR Technical Manual*, an assessment of direct business displacement is warranted if a proposed project would directly displace a business that is unusually important because its products or services are uniquely dependent on its location; is the subject of regulations or publicly adopted plans to preserve, enhance, or otherwise protect it; or that serves a population uniquely dependent on its services in its present location. The proposed projects may require the temporary displacement of one business—Stop 1 Food Market—located on Site 5. Although a detailed analysis is not warranted, unrelated to the potential for significant adverse impacts, the potential loss of employment (approximately 10 workers) falls well below the 100-employee threshold for assessment, and in this respect its potential displacement would not alter the socioeconomic character of the neighborhood. Finally, there are no regulations or publicly adopted plans aimed at preserving a market of this size (approximately 2,100 gsf) within the neighborhood.

While potential direct residential and direct business displacement do not warrant assessment under CEQR, with respect to indirect displacement and adverse effects on a specific industry, each of the proposed projects would exceed a CEQR threshold warranting assessment (development of 200 or more dwelling units). The methodology for each assessment is described below.

INDIRECT RESIDENTIAL DISPLACEMENT

Indirect residential displacement is the involuntary displacement of residents that results from a change in socioeconomic conditions created by a proposed action. Indirect residential displacement can occur if a project either introduces a trend or accelerates a trend of changing socioeconomic conditions that leads to increased residential rents, which in turn may displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. To assess this potential impact, the analysis will address a series of threshold questions in terms of whether the proposed projects would substantially alter the demographic character of an area through population change or the introduction of more costly housing.

The indirect residential displacement analysis will use the most recent available U.S. Census data, New York City Department of Finance's Real Property Assessment Data (RPAD), as well as

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current real estate market data to present demographic and residential market trends and conditions for the study area. The presentation of study area characteristics will include population estimates, ~~housing tenure~~ gross rents and ~~vacancy status~~, current market rate rents, and average and median household income ~~incomes~~. The preliminary assessment will carry out the following step-by-step evaluation:

- **Step 1:** Determine if the proposed actions would add substantial new population with different income as compared with the income of the study area population. If the expected average incomes of the new population would be similar to the average incomes of the study area populations, no further analysis is necessary. If the expected average incomes of the new population would exceed the average incomes of the study area populations, then Step 2 of the analysis will be conducted.
- **Step 2:** Determine if the proposed actions' population is large enough to affect real estate market conditions in the study area. If the population increase may potentially affect real estate market conditions, then Step 3 will be conducted.
- **Step 3:** Determine whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the proposed actions on such trends.
 - If the vast majority of the study area has already experienced a readily observable trend toward increasing rents and new market development, further analysis is not necessary. However, if such trends could be considered inconsistent and not sustained, a detailed analysis may be warranted.
 - If no such trend exists either within or near the study area, the actions could be expected to have a stabilizing effect on the housing market within the study area by allowing limited new housing opportunities and investment. In this circumstance no further analysis is necessary.
 - If those trends do exist near to or within smaller portions of the study area, the action could have the potential to accelerate an existing trend. In this circumstance, a detailed analysis will be conducted.

A detailed analysis, if warranted, would utilize more in-depth demographic analysis and field surveys to characterize existing conditions of residents and housing, identify populations at risk of displacement, assess current and future socioeconomic trends that may affect these populations, and examine the effects of the proposed actions on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

INDIRECT BUSINESS DISPLACEMENT

The indirect business displacement analysis determines whether the proposed actions may introduce trends that make it difficult for those businesses that provide products and services essential to the local economy, or those subject to regulations or publicly adopted plans to preserve, enhance, or otherwise ~~product~~ protect them, to remain in the area. The purpose of this analysis is to determine whether a proposed action has potential to introduce such a trend. The preliminary assessment will entail the following tasks:

- Identify and characterize conditions and trends in employment and businesses within the study area. This analysis will be based on field surveys and employment data from the New York State Department of Labor and/or Census.

- Determine whether the proposed actions would introduce enough of a new economic activity to alter existing economic patterns.
- Determine whether the proposed actions would add to the concentration of a particular sector of the local economy enough to alter or accelerate an ongoing trend to alter existing economic patterns.
- Determine whether the proposed actions would indirectly displace residents, workers, or visitors who form the customer base of existing businesses in the area.

If the preliminary assessment determines that the proposed actions could introduce trends that make it difficult for businesses that are essential to the local economy to remain in the area, a detailed analysis will be conducted. Following *CEQR Technical Manual* guidelines, the detailed analysis would determine whether the proposed actions would increase property values and thus increase rents for a potentially vulnerable category of business and whether relocation opportunities exist for those businesses. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

Based on the findings of the indirect business displacement assessment described above, a preliminary assessment of potential effects on specific industries will examine the following:

- Whether the proposed actions would significantly affect business conditions in any industry or category of businesses within or outside the study area; and
- Whether the proposed actions would indirectly substantially reduce employment or impair the economic viability in a specific industry or category of businesses.

The industries or categories of businesses that will be considered in this assessment are those specified in the North American Industry Classification System (NAICS) as promulgated by the U.S. Census Bureau.

TASK 4: COMMUNITY FACILITIES AND SERVICES

As defined for CEQR analysis, community facilities are public or publicly funded schools, libraries, child care centers, health care facilities and fire and police protection. A project can affect community facility services directly, when it physically displaces or alters a community facility; or indirectly, when it causes a change in population that may affect the services delivered by a community facility. This chapter of the EIS will evaluate the effects on community services due to the proposed actions.

The proposed actions would not have a direct effect on community facilities, as there would not be a physical displacement or alteration of any community facilities. According to the *CEQR Technical Manual*, preliminary thresholds indicating the need for detailed analyses of indirect effects on community facilities are as follows:

- **Public Schools:** The *CEQR Technical Manual* preliminary threshold indicating the need for detailed analysis of public schools is the generation of more than 50 new elementary/middle school or 150 high school students. For Manhattan, an increase of more than 310 units exceeds the threshold for elementary/middle school and more than 2,492 units for high school.
- **Libraries:** The *CEQR Technical Manual* preliminary threshold indicating the need for detailed analysis of libraries is a greater than 5 percent increase in the ratio of residential units to

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libraries in the borough. For Manhattan, this is equivalent to a residential population increase of 901 residential units.

- Health Care Facilities: The ability of health care facilities to provide services for a new project usually does not warrant a detailed assessment under CEQR. Generally, a detailed assessment of health care facilities is included only if a proposed project would directly affect the physical operations of, or access to and from, a hospital or public health clinic, or if a proposed action would create a sizeable new neighborhood where none existed before.
- Child Care Facilities (publicly funded): The *CEQR Technical Manual* preliminary threshold indicating the need for detailed analysis is the generation of more than 20 eligible children based on the number of new low/moderate-income residential units by borough. For Manhattan, an increase of 170 low/moderate-income residential units exceeds this threshold.
- Fire Protection: The ability of the fire department to provide fire protection services for a new project usually does not warrant a detailed assessment under CEQR. Generally, a detailed assessment of fire protection services is included only if a proposed action would directly affect the physical operations of, or access to and from, a fire station house, or if a proposed action would create a sizeable new neighborhood where none existed before.
- Police Protection: The ability of the police department to provide public safety for a new project usually does not warrant a detailed assessment under CEQR. Generally, a detailed assessment of police protective services is included only if a proposed action would directly affect the physical operations of, or access to and from, a precinct house, or if a proposed action would create a sizeable new neighborhood where none existed before.

Based on these thresholds, the proposed actions are not expected to trigger detailed analyses of outpatient health care facilities or police and fire protection serving the project area. However, the proposed actions will require analyses for public elementary, middle, and high schools, publicly funded day care, and libraries. This chapter will therefore include analyses of public schools, publicly funded day care, and libraries, following the guidance of the *CEQR Technical Manual*. These analyses would include the tasks described below.

PUBLIC SCHOOLS

The analysis of public elementary, middle, and high schools will include the following tasks:

- Identify schools serving the project ~~areas~~sites and discuss the most current information on enrollment, capacity, and utilization from the Department of Education. ~~The primary~~ Following the methodologies in the *CEQR Technical Manual*, the study area for the analysis of elementary and intermediate schools ~~should be~~ the school districts' "district's sub-district"²² (also known as regions or school planning zones) in which the project ~~is~~sites are located. However, the project sites are located in Community School District (CSD) 1, which is a school district that has an elementary and intermediate school choice program, which means there are no zoned elementary or intermediate schools in the district and students are allowed to apply to any elementary and intermediate school within CSD 1. Therefore, the study area for the elementary and intermediate schools analysis includes the school district as well as Sub-district 1. The proposed actions also trigger an analysis of high schools, which are assessed on a borough-wide basis.
- Based on the data provided from the Department of Education, the School Construction Authority, and DCP, future conditions in the area without the proposed actions will be determined.

- Based on methodology presented in the *CEQR Technical Manual*, the potential impact of students generated by the proposed actions on public elementary, middle, and high schools will be assessed.

PUBLICLY FUNDED CHILD CARE

The analysis of child care will include the following tasks:

- Identify existing publicly funded ~~group child care and Head Start~~ facilities within approximately 1.5 miles of the project sites.
- Describe each facility in terms of its location, number of slots (capacity), and existing enrollment. ~~Care will be taken to avoid double counting slots that receive both ACS and Head Start funding.~~ Information will be based on publicly available information and/or consultation with the Administration for Children’s Services’ Division of Early Care and Education (ECE).
- Any expected increases in the population of children under 6 within the eligibility income limitations (i.e., children in families that have incomes at or below 200 percent Federal Poverty Level), based on CEQR methodology, will be discussed as potential additional demand, and the potential effect of any population increases on demand for publicly funded ~~group child care and Head Start~~ services in the study area will be assessed. The potential effects of the additional eligible children resulting from the proposed actions will be assessed by comparing the estimated net demand (number of child care-eligible children generated by the proposed projects) over capacity (number of available child care “slots” in the study area) to the net demand over capacity estimated in the No Action condition.

LIBRARIES

The analysis of libraries will include the following tasks:

- Describe and map the local libraries and catchment areas in the vicinity of the project sites.
- Identify the existing user population, branch holdings and circulation. Based on this information, estimate the holdings per resident.
- Determine conditions in the future without the proposed actions based on planned developments and known changes to the library system.
- Based on the population to be added by the proposed actions, estimate the holdings per resident and compare conditions in the future with the proposed actions to conditions in the future without the proposed actions.

TASK 5: OPEN SPACE

The *CEQR Technical Manual* recommends performing an open space assessment if a project would have a direct effect on an area open space (e.g., displacement of an existing open space resource) or an indirect effect through increased population size. For the proposed projects—which are located in a portion of Manhattan Community District (CD) 3 that is considered neither underserved nor well-served by open space—an assessment would be required if the proposed projects’ population is greater than 200 residents or 500 employees.

Compared to conditions in the future No Action condition, the proposed actions are not expected to result in an incremental increase of 500 or more employees; therefore, an assessment of the potential for indirect effects on open space due to an increased worker population is not warranted. However, the increase in the residential population resulting from the proposed actions will exceed

the 200-resident CEQR threshold requiring a residential open space analysis. The methodology set forth in the *CEQR Technical Manual* consists of establishing a study area for analysis, calculating the total population in the study area, and creating an inventory of publicly accessible open spaces within a ~~1/2-~~1/2-mile of the project sites; this inventory will include examining these spaces for their facilities (active vs. passive use), condition, and use (crowded or not). The chapter will project conditions in the No Action scenario, and assess impacts of the proposed actions based on quantified ratios and qualitative factors.¹¹ The new and enhanced private open spaces to be created on the project sites will be described and considered in the analysis qualitatively. ~~The analysis will begin with a preliminary assessment to determine the need for further analysis. If warranted, a detailed~~An assessment will be prepared, following the guidelines of the *CEQR Technical Manual*.

TASK 6: SHADOWS

The *CEQR Technical Manual* requires a shadows assessment for proposed actions that would result in new structures greater than 50 feet in incremental height, or of any height if the project site is adjacent to, or across the street from, a sunlight-sensitive resource. Sunlight-sensitive resources include publicly accessible open spaces, sunlight-sensitive features of historic resources, and natural features.

The proposed projects will result in new structures more than 50 feet taller than what would exist on the sites in the No Action condition, and therefore a shadows assessment will be conducted to determine whether new shadows could be cast on any nearby sunlight sensitive resources. Tasks will include:

- Develop a base map illustrating the project sites in relationship to publicly accessible open spaces, historic resources with sunlight-dependent features, and natural features in the area.
- Determine the longest possible shadows that could result from the proposed actions to determine whether it could reach any sunlight-sensitive resources at any time of year.
- Develop a three-dimensional computer model of the elements of the base map developed in the preliminary assessment, the proposed buildings, and the No Action condition.
- Using three-dimensional computer modeling software, determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the proposed actions on four representative days of the year.
- Document the analysis with graphics comparing shadows resulting from the No Action scenario with shadows in the With Action scenario, with incremental shadow highlighted in a contrasting color. Include a summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource.
- Assess the significance of any shadow impacts on sunlight-sensitive resources. If any significant adverse shadow impacts are identified, identify and assess potential mitigation strategies.

¹¹ The *CEQR Technical Manual* guidelines suggest that a quantitative open space impact may result when a project would reduce the study area's open space ratio by more than 5 percent in areas that are currently below the City's median community district open space ratio of 1.5 acres per 1,000 residents. In areas that are extremely lacking in open space, a reduction as small as 1 percent may be considered significant, depending on the area of the City.

TASK 7: HISTORIC AND CULTURAL RESOURCES

The *CEQR Technical Manual* identifies historic resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic resources include designated New York City Landmarks (NYCLs) and Historic Districts (NYCHDs); properties calendared for consideration as NYCLs by the Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation; properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing, or properties contained within a S/NR listed or eligible district; properties recommended by the New York State Board for listing on the S/NR; and National Historic Landmarks (NHLs).

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if a project would have the potential to affect either archaeological or architectural resources. It is expected that the projects all would require subsurface disturbance on their respective sites and thus it will be necessary to analyze the potential impacts of the proposed actions on archaeological resources. Therefore, consistent with the *CEQR Technical Manual*, the historic and cultural resources analysis will include the following tasks:

ARCHAEOLOGICAL RESOURCES

- Consult with the New York City Landmarks Preservation Commission (LPC) regarding the potential archaeological sensitivity of the project sites. In ~~a comment letter~~ letters dated February 6, 2017 and March 2, 2017, LPC determined that, based on its review of archaeological sensitivity models and historic maps, there is potential for the recovery of remains from Colonial and 19th Century occupation on the project sites. Accordingly, LPC recommended that an archaeological documentary study be performed for the project sites to clarify these initial findings and provide the threshold for the next level of review, if such review is necessary. A Phase 1A Archaeological Study will be prepared as requested by LPC and summarized in the EIS. Should any additional archaeological analysis be required based on the findings of the Phase 1A study, it would be conducted in coordination with LPC.

ARCHITECTURAL RESOURCES

- Map and briefly describe any known architectural resources within a 400-foot study area surrounding the project sites.
- Conduct a field survey by an architectural historian of the study area, to identify any potential architectural resources that could be affected by the proposed actions. Potential architectural resources comprise properties that appear to meet the eligibility criteria for NYCL designation and/or S/NR listing. The field survey will be supplemented, as necessary, with research at relevant repositories, online sources, and current sources prepared by LPC and OPRHP. Determinations of eligibility from LPC will be requested for any potential architectural resources. Map and briefly describe any identified potential architectural resources.
- Evaluate the potential for the proposed actions to result in direct, physical effects on any identified architectural and archaeological resources. Assess the potential for the proposed actions to result in any visual and contextual impacts on architectural resources. Potential effects will be evaluated through a comparison of the No Action condition and the With Action condition.
- If applicable, develop measures to avoid, minimize, or mitigate any adverse impacts on historic and cultural resources, in consultation with LPC.

TASK 8: URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the *CEQR Technical Manual*, if a project requires actions that would result in physical changes to a project site beyond those allowable by existing zoning and which could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared. As described in the *CEQR Technical Manual*, examples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline.

For the EIS, a preliminary assessment of urban design and visual resources will first be prepared. The preliminary assessment will determine whether the proposed actions, in comparison to the No Action condition, would create a change to the pedestrian experience that is significant enough to require greater explanation and further study. The study area for the preliminary assessment of urban design and visual resources will be consistent with that of the study area for the analysis of land use, zoning, and public policy. The, and public policy, which is ¼-mile from the boundary of the Two Bridges LSRD. A secondary ½-mile study area from the boundary of the Two Bridges LSRD also will be analyzed and includes the Brooklyn waterfront. In addition, the urban design and visual resources analysis will also account for longer views to the project sites, including views from the Brooklyn waterfront. Due to distance from the project sites, the secondary study area will be described more generally, with a more detailed discussion of longer views to the project sites, including views from the Brooklyn waterfront. In addition, for visual resources and view corridors, views to the project sites from the Manhattan, Williamsburg, and Brooklyn Bridges will also be considered. The preliminary assessment will include a concise narrative of the existing area, the No Action condition, and the future with the proposed actions. The analysis will draw on information from field visits to the study area and will present photographs, zoning and floor area calculations, building heights, project drawings and site plans, and view corridor assessments. ~~The analysis also will describe potential wind conditions related to the proposed site plans and building massings.~~

A detailed analysis will be prepared if warranted based on the preliminary assessment. As described in the *CEQR Technical Manual*, examples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline. The detailed analysis would describe the urban design and visual resources of the project area and the surrounding area. The analysis would describe the potential changes that could occur to urban design and visual resources in the future with the proposed actions, in comparison to the No Action condition, focusing on the changes that could potentially adversely affect a pedestrian's experience of the area. Since the proposed projects involve the construction of multiple tall buildings at locations that experience high wind conditions, a detailed analysis will be performed to evaluate whether the proposed projects may result in an exacerbation of wind conditions that may affect pedestrian safety. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

TASK 9: NATURAL RESOURCES

Under the *CEQR Technical Manual*, a natural resource is defined as the City's biodiversity (plants, wildlife and other organisms); any aquatic or terrestrial areas capable of providing suitable habitat to sustain the life processes of plants, wildlife, and other organisms; and any areas capable of functioning in support of the ecological systems that maintain the City's environmental stability.

Such resources include ground water, soils and geologic features; numerous types of natural and human-created aquatic and terrestrial habitats (including wetlands, dunes, beaches, grasslands, woodlands, landscaped areas, gardens, parks, and built structures); as well as any areas used by wildlife.

The three project sites comprise developed areas with buildings, surface parking, and open space; as such, vegetation is limited primarily to street trees, and there is minimal habitat to support native wildlife. The three project sites are within the 100-year floodplain and 500-year floodplain as indicated on the Federal Emergency Management Agency (FEMA) Revised Preliminary Flood Insurance Rate Maps (PFIRMs).

The natural resources assessment will characterize the existing natural resources within or in the vicinity of the three project sites, including floodplains, terrestrial natural resources (vegetation and wildlife), groundwater resources, and threatened, endangered, and special concern species. The assessment of the potential for the proposed actions to affect natural resources will consider short-term construction effects, long-term effects such as the potential for bird strikes with the proposed buildings and beneficial impacts to wildlife from any landscaping and establishment of street trees that would be implemented as part of the proposed actions. A discussion of any related permits that may be required will be provided.

The natural resources analysis will include the following tasks:

- On the basis of existing information site reconnaissance, characterize the existing natural resources (floodplains, terrestrial plants, wildlife, groundwater resources, and threatened, endangered, and special concern species), within and adjacent to the three project sites.
- Assess potential effects to natural resources in the future without the proposed actions, accounting for any changes in the study area that may alter terrestrial natural resources in the vicinity of the three project sites.
- Assess potential impacts to natural resources from the proposed actions. Potential impacts to terrestrial resources will be assessed by considering removal of the existing structures and construction of new structures, visual and noise disturbances to wildlife in the vicinity of the three project sites, the potential for bird strikes with the proposed structures, and benefits of landscaping and planting of street trees that would occur as part of the proposed actions. The need for any state or federal approvals will be identified.

The future No Action condition for the natural resources within the three project sites and study area for the propose actions will be described in the EIS as the baseline condition. The potential effects of the proposed actions on natural resources, in comparison to the No Action condition, will be assessed. The short-term and long-term impacts of the proposed actions on the environment will be discussed, as well as concepts for the potential mitigation of identified significant impacts to natural resources.

TASK 10: HAZARDOUS MATERIALS

This chapter of the EIS will include a summary of current Phase I Environmental Site Assessments and any other available hazardous materials studies for Site 4_(4A/4B) and Site 6A, as well as general requirements for environmental management during construction including soil management and environmental health and safety. A Phase I ESA uses historical maps, regulatory databases and a site inspection to determine potential sources of contamination. The chapter will summarize the significant conclusions of the Phase I ESAs and any other available studies and ~~will include any~~ set out requirements for subsurface (Phase II) testing or other activities, such as

preparation and implementation of a Remedial Action Plan and Health and Safety Plan, needed either prior to or during construction of the proposed projects to avoid the potential for significant adverse impacts.

Site 5 carries an environmental (E) ~~designation~~Designation for hazardous materials. Hazardous materials (E) ~~designations~~Designations fall under the auspices of the NYC Office of Environmental Remediation (OER). Thus, for that site, the hazardous materials section of the EIS will summarize OER's requirements, which the Site 5 project will satisfy in order to avoid hazardous materials impacts.

TASK 11: WATER AND SEWER INFRASTRUCTURE

According to the *CEQR Technical Manual*, a water and sewer infrastructure assessment analyzes whether a proposed project may adversely affect New York City's water distribution or sewer system and, if so, assess the effects of such projects to determine whether their impact is significant, and present potential mitigation strategies and alternatives. Because the proposed actions would introduce an incremental increase above the No Action scenario of more than 1,000 residential units and the project sites are located in a combined sewer area within Manhattan, an analysis of water and sewer infrastructure is warranted. Additionally, the *CEQR Technical Manual* recommends a preliminary water supply analysis because the projects would collectively result in a demand for water of over one million gallons per day. This analysis will consist of the following:

- The existing stormwater drainage system and surfaces (pervious or impervious) on the project sites will be described, and the amount of wastewater and stormwater generated on the sites will be estimated using rates provided in the *CEQR Technical Manual* and DEP's volume calculation worksheet. Drainage areas with direct discharges and overland flow will be presented.
- The existing sewer system serving the project sites will be described based on records obtained from DEP (e.g., sewer network maps, drainage plans). The existing flows to the Newtown Creek Wastewater Treatment Plan (WWTP), which serves the project sites, will be obtained for the latest 12-month period, and the average dry weather monthly flow will be presented.
- Any changes to the sites' stormwater drainage system and surface area expected in the future without the proposed actions will be described. In addition, any changes to the sewer system expected to occur in the future without the proposed actions will be described, based on information provided by DEP.
- The analysis of potential impacts will consider future stormwater generation from the proposed projects. The assessment will discuss any planned sustainability elements that are intended to reduce storm water runoff. Any changes to the sites' proposed surface areas (pervious or impervious) will be described, and runoff coefficients and runoff for each surface type/area will be presented. Volume and peak discharge rates of stormwater from the sites will be determined based on the DEP volume calculation matrix.
- Water demand and sanitary sewage generation for the proposed projects will be estimated. The effects of the incremental demand on the system will be assessed to determine the potential for impacts on operations of the New York City water supply system as well as the Newtown Creek WWTP.
- Sanitary sewage generation for the proposed projects will be estimated. The effects of the incremental demand on the system will be assessed to determine the impact on operations of the Newtown Creek WWTP.

- Based on the analyses of future stormwater and wastewater generation, the change in flows and volumes to the sewer system and waterbodies due to the proposed projects will be determined.

TASK 12: SOLID WASTE

A solid waste assessment determines whether an action has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan or with State policy related to the City's integrated solid waste management system. The proposed projects would induce new development that would require sanitation services. If a project's generation of solid waste in the With-Action condition would not exceed 50 tons per week, it may be assumed that there would be sufficient public or private carting and transfer station capacity in the metropolitan area to absorb the increment, and further analysis generally would not be required. As the proposed projects are expected to result in a net increase of more than 50 tons per week, compared to the No Action condition, an assessment of solid waste and sanitation services is warranted. This chapter will provide an estimate of the additional solid waste expected to be generated by the proposed projects and assesses its effects on the City's solid waste and sanitation services. This assessment will:

- Describe existing and future New York City solid waste disposal practices;
- Estimate solid waste generation by the proposed projects for existing, No Action, and With Action conditions; and
- Assess the impacts of the proposed projects' solid waste generation on the City's collection needs and disposal capacity. The proposed projects' consistency with the City's Solid Waste Management Plan will also be assessed.

TASK 13: ENERGY

The *CEQR Technical Manual* recommends a detailed analysis of energy impacts for projects that could significantly affect the transmission or generation of energy or that cause substantial new consumption of energy. Because the proposed projects would not result in any of these conditions, a detailed assessment of energy impacts is not necessary. Nevertheless, the *CEQR Technical Manual* recommends that a project's energy consumption be calculated and disclosed; therefore, the EIS will disclose the projected amount of energy that would be consumed by the proposed projects.

TASK 14: TRANSPORTATION

In accordance with guidance prescribed in the *CEQR Technical Manual*, the evaluation of potential transportation-related impacts associated with a proposed development begins with screening assessments, which encompass the preparation of travel demand estimates and/or trip assignments, to determine if detailed analyses would be warranted to address the potential impacts project-generated trips may have on the transportation system. For the proposed actions, these screening assessments are expected to show that detailed analyses of traffic, transit, pedestrians, vehicle/pedestrian safety, and parking for weekday peak periods would be required. The transportation scope of work is outlined below.

TRAVEL DEMAND PROJECTIONS AND SCREENING ASSESSMENTS

The transportation analysis for the EIS will assess potential impacts associated with trip increments that could occur as a result of the proposed actions. Travel demand estimates and trip assignments will be prepared for the proposed actions. The screening assessments entail evaluating the results of these trip estimates to identify the appropriate study areas for detailed analyses and summarize the findings in a Travel Demand Factors (TDF) memorandum ~~Memorandum~~ (see [Appendix E](#),) for review and concurrence by the lead agency, the New York City Department of Transportation (DOT), and/or New York City Transit (NYCT). For technical areas determined to require further detailed analyses (i.e., traffic, parking, transit, and/or pedestrians), those analyses will be prepared in accordance with *CEQR Technical Manual* procedures.

TRAFFIC

Given the scale of the proposed projects as well as the proposed mix of uses, a detailed analysis of traffic operations will be required for the weekday AM, midday, and PM peak periods at approximately 30 intersections.

Data Collection and Baseline Traffic Volumes

Data collection efforts will be undertaken pursuant to *CEQR Technical Manual* guidelines. The traffic data collection program will include continuous (9-day) automatic traffic recorder (ATR) counts, intersection turning movement and vehicle classification counts, conflicting bike/pedestrian volumes, and an inventory of existing roadway geometry (including street widths, travel directions, lane markings, curbside regulations, bus stop locations, etc.) and traffic control. Field observations will be collected that document any traffic queuing, construction activities, or other unusual conditions that would affect normal traffic flows. This program will also document existing driveway activities on the project sites and consider data needs for the mobile source air quality analysis described in the next section. Official signal timing data will be obtained from DOT for incorporation into the capacity analysis described below. Using the collected traffic data, balanced traffic volume networks will be developed for the weekday AM, midday, and PM peak hours.

Existing Conditions Capacity Analysis

The traffic analysis will be performed in accordance with 2000 *Highway Capacity Manual* (HCM) procedures, using software approved by the lead agency and DOT. Analysis results for the weekday AM, midday, and PM peak hours will be tabulated to show intersection, approach, and lane group volume-to-capacity (v/c) ratio, average vehicle delay, and level-of-service (LOS). Congested vehicle movements will be described.

No Action Condition Analysis

The future No Action traffic volumes will incorporate *CEQR Technical Manual* recommended background growth plus trips expected to be generated by nearby development projects. Physical and operational changes that are expected to be implemented independent of the proposed projects, if any, will also be incorporated into the future traffic analysis network. The same intersections selected for analysis under existing conditions will be assessed to identify changes in v/c ratio, average vehicle delay, and LOS. Notable deteriorations in service levels will be described.

With Action Condition Analysis

Incremental vehicle trips associated with the proposed actions will be overlaid onto the No-Action peak hour traffic networks, accounting for also changes in site access and circulation, for analysis of potential impacts. Vehicle movements found to incur delays exceeding the CEQR impact thresholds will be described. For these locations, traffic engineering improvement measures will be explored to mitigate the identified significant adverse traffic impacts to the extent practicable.

TRANSIT

Due to comparatively higher transit ridership on weekday commuter hours than other weekday and weekend time periods, the analysis of potential transit impacts typically considers only the weekday AM and PM peak periods. For the proposed actions, a detailed analysis of control areas and pedestrian circulation elements is expected to be required for the East Broadway Station (F line). In addition, a line-haul analyses analysis will be conducted, as warranted, for this subway line and the. A line-haul analysis of nearby bus routes (i.e., M22 and M15)-) has been determined to be unwarranted. If significant adverse impacts are identified, improvement measures will be recommended to mitigate the impacts to the extent practicable. If mitigation measures are needed for station improvements, they will be developed in consultation with NYCT.

PEDESTRIANS

Detailed pedestrian analyses will be conducted for the weekday AM, midday, and PM peak periods. These analyses will consider sidewalk, corner reservoir, and crosswalk facilities surrounding the project sites and along key routes to nearby transit resources, as determined by the TDF ~~memo~~ Memorandum (see Appendix E) and consultation with DOT. Where significant adverse impacts are identified, improvement measures will be recommended to mitigate the impacts to the extent practicable.

VEHICLE/PEDESTRIAN SAFETY

An assessment of vehicular and pedestrian safety issues will be included with the pedestrian analysis. The most recent three years of crash data will be obtained from the New York State Department of Transportation (NYSDOT) for the study area intersections. These data will be analyzed to determine if any of the studied locations may be classified (using CEQR criteria) as high vehicle crash or high pedestrian/bike accident locations and whether trips and changes resulting from the proposed projects would adversely affect vehicular and pedestrian safety at these locations. If any high accident locations are identified, feasible improvement measures will be explored to alleviate potential safety issues.

PARKING

A parking survey will be performed to collect information on the off-street parking supply and utilization within ½-mile of the project sites. For the proposed actions, a parking demand projection will be prepared to determine how the future demand could be accommodated on-site or at surrounding parking resources and to identify potential parking shortfall, if any.

TASK 15: AIR QUALITY

The vehicle trips generated by the proposed actions would potentially exceed the *CEQR Technical Manual's* carbon monoxide (CO) screening threshold of 170 vehicles in a peak hour at any

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intersection and/or the particulate matter (PM) emission screening threshold discussed in Chapter 17, Sections 210 and 311 of the *CEQR Technical Manual*. Therefore, a screening analysis for mobile sources will be performed. If screening thresholds are exceeded, a detailed mobile source analysis would be required. Additionally, the parking facility on Site 5 will ~~also~~ be analyzed to determine its effect on air quality. The proposed project would also introduce sensitive uses within 200 feet of the elevated section of the FDR Drive; therefore, the effects of this existing roadway on the proposed uses need to be analyzed, as recommended in the *CEQR Technical Manual*.

Potential impacts on surrounding uses from the heating and hot water systems that would serve the proposed buildings will be assessed, as will potential impacts on the proposed buildings from existing buildings in the surrounding area. The effect of heating and hot water systems associated with large or major emission sources in existing buildings on the project sites will be analyzed, if required. ~~Since Although~~ the project sites are within 400 feet of an area zoned for manufacturing. However, an assessment of uses surrounding the project sites ~~will be conducted is not warranted to determine the potential for impacts from industrial emissions sources, in accordance with CEQR Technical Manual methodologies, since there do not appear to be any active industrial or commercial uses in these areas.~~

MOBILE SOURCE ANALYSIS

- A screening analysis for CO and PM for the worst case scenario location(s) will be prepared based on the traffic analysis and the above-mentioned CEQR criteria. If screening levels are exceeded, a dispersion analysis would be required, at one or more intersection locations.
- Select emission calculation methodology. Compute vehicular cruise and idle emission factors for the proposed parking facility, using the MOVES 2014a model and applicable assumptions based on guidance by EPA, DEC, and DEP.
- Select appropriate CO and PM background levels for the study area.
- Perform an analysis of CO and PM for the proposed parking facility on Site 5. The analysis will use the procedures outlined in the *CEQR Technical Manual* for assessing potential impacts from proposed parking facilities. Cumulative impacts from on-street sources and emissions from the parking facility will be calculated, where appropriate.
- Perform an analysis of CO and PM impacts on the proposed projects from vehicle traffic on the elevated FDR Drive, as per the *CEQR Technical Manual*.
- Evaluate potential impacts by comparing predicted future CO and PM levels with standards, and *de minimis* criteria. If significant adverse impacts are predicted, recommend design measure to minimize impacts.

STATIONARY SOURCE ANALYSIS

- A detailed stationary source analysis will be performed using the EPA AERMOD dispersion model to estimate the potential impacts from the heating and hot water systems for the proposed projects, as well as the potential for impacts on the proposed buildings from existing buildings in the surrounding area. Five years of recent meteorological data, consisting of surface data from the LaGuardia Airport National Weather Service Station, and concurrent upper data from Brookhaven, New York, will be used for the simulation modeling. Concentrations of the air contaminants of concern will be determined at sensitive receptor locations on the proposed project, as well as at off-site locations from the cumulative effects of the emission sources associated with the proposed project. Predicted values will be

compared with the corresponding guidance thresholds and national ambient air quality standards.

- ~~Since the project sites are located within 400 feet a manufacturing district, an assessment of uses surrounding the development site will be conducted to determine the potential for impacts from industrial emissions, in accordance with *CEQR Technical Manual* methodologies. A field survey will be performed to determine if there are any processing or manufacturing facilities within 400 feet of the development site. If permit information on any emissions from processing or manufacturing facilities within 400 feet of the development site are identified, an industrial source screening analysis as detailed in the *CEQR Technical Manual*, will be performed.~~
- Due to the proximity of the 80 Rutgers Slip building to the proposed Site 4 (4A/4B) building, a screening analysis of the heating and hot water systems from 80 Rutgers Slip on potential sensitive receptor locations on the residential floors of Site 4 (4A/4B) will be performed using the EPA AERSCREEN model.

TASK 16: GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

In accordance with the *CEQR Technical Manual*, greenhouse gas (GHG) emissions generated by the proposed projects will be cumulatively quantified, and an assessment of consistency with the City's established GHG reduction goal will be prepared. Emissions will be estimated for the analysis year and reported as carbon dioxide equivalent (CO₂e) metric tons per year for each project and cumulatively. GHG emissions other than carbon dioxide (CO₂) will be included if they would account for a substantial portion of overall emissions, adjusted to account for the global warming potential.

Relevant measures to reduce energy consumption and GHG emissions that could be incorporated into each of the proposed projects will be discussed, and the potential for those measures to reduce GHG emissions will be assessed to the extent practicable.

Since the project sites are located in a flood hazard zone, the potential impacts of climate change on the proposed projects will be evaluated. The discussion will focus on sea level rise and changes in storm frequency projected to result from global climate change and the potential future impact of those changes on project infrastructure and uses.

The analysis will consist of the following subtasks:

- The potential effects of climate change on the project sites will be evaluated based on the best available information. The evaluation will focus on potential future sea and storm levels and the interaction with project infrastructure and uses. The discussion will focus on early integration of climate change considerations into the three project designs to allow for uncertainties regarding future environmental conditions resulting from climate change.
- Direct Emissions—GHG emissions from on-site boilers used for heat and hot water and natural gas used for cooking, if any, will be quantified. Emissions will be based on available project-specific information regarding the project's expected fuel use or carbon intensity factors specified in the *CEQR Technical Manual* where data is not available.
- Indirect Emissions—GHG emissions from purchased electricity off-site and consumed on-site during the projects' operation will be estimated.

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- Indirect Mobile Source Emissions—GHG emissions from vehicle trips to and from the project sites will be quantified using trip distances and vehicle emission factors provided in the *CEQR Technical Manual*.
- Emissions from project construction and emissions associated with the extraction or production of construction materials will be qualitatively discussed. Opportunities for reducing GHG emissions associated with construction will be considered.
- Design features and operational measures to reduce the proposed project's energy use and GHG emissions will be discussed and quantified to the extent that information is available.
- Consistency with the City's GHG reduction goal will be assessed. While the City's overall goal is to reduce GHG emissions by 30 percent below 2005 level by 2025, individual project consistency is evaluated based on building energy efficiency, proximity to transit, on-site renewable power and distributed generation, efforts to reduce on-road vehicle trips and/or to reduce the carbon fuel intensity or improve vehicle efficiency for project-generated vehicle trips, and other efforts to reduce the project's carbon footprint.

TASK 17: NOISE

The noise analysis will examine impacts of existing noise sources (e.g., vehicular traffic from adjacent roadways) on the proposed residential and open space uses and the potential impacts of project-generated noise on noise-sensitive land uses nearby. This will include noise monitoring to determine existing ambient noise levels as well as projections of future noise levels based on expected changes in changes in vehicular traffic on adjacent roadways. The subtasks are as follows:

- Select appropriate noise descriptors. Appropriate noise descriptors to describe the existing noise environment will be selected. The L_{eq} and L_{10} levels will be the primary noise descriptors used for the noise analysis. Other noise descriptors including the L_1 , L_{10} , L_{50} , L_{90} , L_{min} , and L_{max} levels will be examined when appropriate.
- Perform a screening analysis to determine whether there are any locations where there is the potential for the proposed actions to result in significant noise impacts (e.g., doubling of noise PCEs) due to project-generated traffic. If the results of the traffic study indicate that a doubling of traffic would occur, a mobile source noise analysis would be performed.
- Select receptor locations for noise exposure analysis purposes. Receptor sites analyzed will include locations where high existing ambient noise levels could adversely affect new residential and other sensitive uses associated with the project.
- Determine existing noise levels. At each of the receptor sites identified above, 20-minute measurements would be performed during typical weekday AM, midday, and PM peak periods. L_1 , L_{10} , L_{50} , L_{90} , L_{min} , and L_{max} values will be recorded.
- Data analysis and reduction. The results of the noise measurement program will be analyzed and tabulated
- Determine future noise levels without the proposed actions. Based upon the results of noise level measurements, the results of traffic analysis, and the use of mathematical models, noise levels at each noise receptor location shall be determined.
- Determine future noise levels with the proposed actions. Based upon the results of noise level measurements, the results of traffic analysis, and the use of mathematical models, noise levels at each noise receptor location shall be determined.

- Determine amount of building attenuation required. The level of building attenuation necessary to satisfy CEQR requirements is a function of the exterior noise levels, and will be determined. Projected future noise levels will be compared to appropriate standards and guideline levels. As necessary, general noise attenuation measures needed for project buildings to achieve compliance with standards and guideline levels will be recommended.
- Open Space Noise Analysis. Predicted noise levels at open space areas associated with the proposed projects will be compared to *CEQR Technical Manual* noise exposure guidelines for open space.
- (E) ~~designation~~Designation requirements. An (E) ~~designation~~Designation for noise is mapped on Site 5. The Noise chapter of the EIS will summarize the requirements of this (E) ~~designation~~Designation.
- A detailed analysis of the proposed development's mechanical equipment will not be required, because any stationary noise sources associated with the proposed project (i.e., HVAC/R equipment) would be designed to meet applicable noise regulations, which are more stringent than CEQR noise impact criteria.

TASK 18: NEIGHBORHOOD CHARACTER

Neighborhood character is established by a number of factors, such as land use, zoning, and public policy; socioeconomic conditions; open space; urban design and visual resources; shadows; transportation; and noise. According to the guidelines of the *CEQR Technical Manual*, an assessment of neighborhood character is generally needed when a proposed project has the potential to result in significant adverse impacts in one of the technical areas presented above, or when a project may have moderate effects on several of the elements that define a neighborhood's character.

Methodologies outlined in the *CEQR Technical Manual* will be used to provide an assessment of neighborhood character. Work items for this task are as follows:

- Based on other EIS sections, describe the predominant factors that contribute to defining the character of the neighborhood surrounding the project site.
- Based on planned development projects, public policy initiatives, and planned public improvements, summarize changes that can be expected in the character of the area in the future without the proposed actions.
- Assess and summarize the proposed actions' effects on neighborhood character using the analysis of impacts as presented in other pertinent EIS sections (particularly socioeconomic conditions, open space, urban design and visual resources, shadows, traffic, and noise).

TASK 19: CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. The construction assessment will focus on areas where construction activities may pose specific environmental problems. According to the *CEQR Technical Manual*, a large-scale development project with an overall construction period lasting longer than two years and that is near to sensitive receptors (i.e., residences, open spaces, etc.) should undergo a construction impact assessment. The construction impact assessment will evaluate the duration and severity of the disruption or inconvenience to nearby sensitive receptors and will be based on a conceptual construction schedule for the proposed projects with anticipated construction duration for each of the proposed projects. The construction

assessment will focus on the cumulative construction effects of the proposed projects. This assessment will describe the likely construction schedule and logistics for each project, discuss anticipated on-site activities, and provide estimates of construction workers and truck deliveries.

Technical areas to be assessed include the following:

- **Transportation Systems.** This assessment will consider losses in lanes, sidewalks, off-street parking on the project sites, and effects on other transportation services (i.e., transit and pedestrian circulation) during the construction periods, and identify the increase in vehicle trips from construction workers and equipment. Issues concerning construction worker parking and truck delivery staging will also be addressed. Based on the trip projections of activities associated with peak construction for the proposed projects, an assessment of potential transportation impacts during construction and how they are compared to the trip projections under the operational condition will be provided. ~~If this effort identifies the need for a separate detailed analysis due to an exceedance of the CEQR Technical Manual quantified transportation analyses thresholds (50 or more vehicle trips and/or 200 or more transit/pedestrian trips during a given peak hour), such analysis will be prepared.~~
- **Air Quality.** Due to the anticipated duration of construction duration, construction of multiple buildings, and proximity to sensitive receptor locations such as residences and nearby open spaces, the proposed projects would have the potential for construction effects related to air quality. A detailed dispersion analysis of construction sources will be performed to determine the potential for air quality impacts on sensitive receptor locations. Air pollutant sources would include combustion exhaust associated with non-road construction engines (e.g., cranes, excavators) and trucks operating on-site, construction-generated traffic on local roadways, as well as onsite activities that generate fugitive dust (e.g., excavation, demolition). The pollutants of concern include carbon monoxide (CO), particulate matter (PM), and nitrogen dioxide (NO₂). The potential for significant impacts will be determined by a comparison of model predicted total concentrations to the National Ambient Air Quality Standards (NAAQS), or by comparison of the predicted increase in concentrations to applicable interim guidance thresholds. The air quality analysis will also include a discussion of the strategies and best management practices to reduce project related air pollutant emissions associated with construction activities.
- **Noise and Vibration.** A quantitative construction noise analysis will be prepared to examine potential noise impacts due to construction-related stationary and mobile sources. In the detailed construction noise analysis, existing noise levels will be determined by noise measurements performed at at-grade receptor locations. During the most representative worst-case time periods, noise levels due to construction of the proposed project will be predicted for each sensitive receptor. The noise analysis will also include a discussion of strategies to reduce noise associated with construction activities. Based on the results of the construction noise analysis, if necessary, the feasibility, practicability, and effectiveness of implementing measures to mitigate significant construction noise impacts will be examined.

Construction activities have the potential to result in vibration levels that may result in structural or architectural damage, and/or annoyance or interference with vibration-sensitive activities. Therefore, a construction vibration assessment will be performed. This assessment will determine critical distances at which various pieces of equipment may cause damage or annoyance to nearby buildings based on the type of equipment, the building construction, and applicable vibration level criteria. Should it be necessary for certain construction equipment

to be located closer to a building than its critical distance, measures to reduce the potential effects of vibrations will be proposed.

- Other Technical Areas. As appropriate, discuss other areas of environmental assessment for potential construction-related impacts, including ~~but not limited to~~ historic and cultural resources, natural resources, hazardous materials, open space, socioeconomic conditions, community facilities, and land use and neighborhood character.

TASK 20: ALTERNATIVES

The purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the proposed project. The alternatives are usually defined when the full extent of a proposed project's impacts is identified, but at this time, it is anticipated that they will include the following:

- A No Action Alternative, which describes the conditions that would exist in the future if the proposed actions were not implemented;
- A No Unmitigated Significant Adverse Impacts Alternative, if unavoidable adverse impacts are identified in the EIS, which describes the changes in the proposed program and design which would be necessary in order to eliminate the identified unavoidable adverse impacts; and
- A discussion of other possible alternatives that may be developed in consultation with the lead agency during the EIS preparation process, such as alternatives that may reduce but not eliminate identified unavoidable adverse impacts, or that may be posed by the public during the scoping of the EIS.

For technical areas where impacts have been identified, the alternatives analysis will determine whether these impacts would still occur under each alternative. The analysis of each alternative will be qualitative, except where impacts from the proposed projects have been identified.

TASK 21: MITIGATION

Where significant adverse impacts have been identified in the EIS, this chapter will describe the measures to mitigate those impacts. These measures will be developed and coordinated with the responsible city and state agencies, as necessary, and also will be the subject of discussion during the community outreach meetings described above. Where impacts cannot be mitigated, they will be described as unavoidable adverse impacts.

TASK 22: ANALYSIS OF PROJECT PERMUTATIONS

In order to understand how the cumulative impacts of the proposed projects might change if one or more of the projects is delayed indefinitely or ultimately not pursued, the EIS will also provide an analysis of such permutations in a separate chapter. The analysis will be limited to evaluating specific locations or facilities for which impacts and mitigation needs have been identified under the cumulative impact analysis of all three projects. The assessments for the relevant technical areas will be targeted to focus on those impacts.

TASK 23: PUBLIC HEALTH

According to the *CEQR Technical Manual*, public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment

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and surveillance; health promotion; prevention of disease, injury, disorder, disability and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts on public health may occur as a result of a proposed project, and if so, to identify measures to mitigate such effects.

According to the guidelines of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified in any one of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for that specific technical area.

TASK 24: EIS SUMMARY CHAPTERS

Several summary chapters will be prepared, focusing on various aspects of the EIS, as set forth in the regulations and the *CEQR Technical Manual*. They are as follows:

Once the EIS technical sections have been prepared, a concise executive summary will be drafted. The executive summary will use relevant material from the body of the EIS to describe the proposed actions, environmental impacts, measures to mitigate those impacts, and alternatives to the proposed actions.

In accordance with *CEQR Technical Manual* guidelines, the EIS will include the following summary chapters will be prepared, focusing:

UNAVOIDABLE ADVERSE IMPACTS

This chapter summarizes any significant adverse impacts, if any, which that could not be avoided and could if the proposed actions are implemented regardless of the mitigation employed (or if mitigation is not be practicably mitigated, will be described in this chapter. feasible or practicable).

GROWTH-INDUCING ASPECTS OF THE PROPOSED PROJECTS

This chapter will focuses on whether the proposed projects would have the potential to induce new development, or “secondary” impacts, within the surrounding area.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

This chapter focuses on those summarizes the proposed actions and their impacts in terms of the loss of environmental resources, such as (i.e., use of energy and construction materials, etc.), both in the immediate future and in the long term. that would be irretrievably committed should the proposed projects be built.

EXECUTIVE SUMMARY

Once the EIS technical sections have been prepared, a concise executive summary will be drafted. The executive summary will use relevant material from the body of the EIS to provide a concise description of describe the proposed actions, any significant and adverse environmental impacts, measures to mitigate those impacts, and alternatives to the proposed actions. *

APPENDIX A

Response to Comments on the Draft Scope of Work

Appendix A: Response to Comments on the Draft Scope of Work

A. INTRODUCTION

This appendix summarizes and responds to substantive comments received during the public comment period for the Draft Scope of Work for the Two Bridges Large Scale Residential Development (LSRD). The public hearing on the Draft Scope of Work was held on May 25, 2017 in the Municipal Building, 1 Centre Street, New York, New York. The comment period remained open until June 8, 2017.

Section B lists the organizations and individuals that provided comments relevant to the Draft Scope of Work. Section C contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the heading structure of the Draft Scope of Work. Where more than one commenter expressed similar views, those comments have been grouped and addressed together. Written comments are included in this in Appendix C, “Comments Received on the Draft Scope of Work.”

B. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT SCOPE OF WORK

ELECTED OFFICIALS¹

1. Gale A. Brewer, Manhattan Borough President, written testimony (Brewer_004) (Brewer_049) and oral comments (Brewer_045) delivered May 25, 2017
2. Margaret S. Chin, New York City Council, written testimony (NYCC_Chin_059) and oral comments (NYCC_Chin_060) delivered May 25, 2017
3. Yuh-Line Niou, Assemblymember, Assembly District 65, oral comments delivered May 25, 2017 (Niou_025)
4. Daniel Squadron, New York State Senate, written testimony and (Squadron_006) oral comments (Squadron_026) delivered May 25, 2017

COMMUNITY BOARD

5. Jamie Rogers, Chair, Manhattan Community Board 3, written testimony (CB3_Rogers_005) and oral comments (CB3_Rogers_044) delivered May 25, 2017

ORGANIZATIONS

6. Committee Against Anti-Asian Violence—Cathy Dang, Executive Director, oral comments delivered May 25, 2017 (CAAAV_Dang_033); Melanie Wang, Chinatown Tenant Union

¹ Citations in parentheses refer to internal comment tracking annotations.

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- Organizer, oral comments (CAA AV_Wang_031) and written testimony (CAA AV_Wang_046) delivered on May 25, 2017
7. Good Old Lower East Side—Jessie Ngok, Land Use Organizer, oral comments delivered May 25, 2017 (GOLES_Ngok_034); Ceci Pinada, Resiliency Training and Policy Coordinator, oral comments delivered May 25, 2017 (GOLES_Pinada_041)
 8. Land's End One Tenant Association—Daisy Echevarria, Vice President, written testimony (LEOTA_009) and oral comments (LEOTA_Echevarria_078) delivered May 25, 2017; Aaron Gonzalez, President, written testimony (LEOTA_009) and oral comments (LEOTA_Gonzalez_079) delivered May 25, 2017; Marc Richardson, Member, oral comments delivered May 25, 2017 (LEOTA_Richardson_081); Tanya Castro-Negron, Resident, oral comments delivered May 25, 2017 (LETTA_Castro-Negron_073)
 9. Little Cherry LLC—letter dated June 6, 2017 (LittleCherry_020); Brendan Schmidt, oral comments delivered May 25, 2017 (LittleCherry_Schmidt_063); Gary Spindler, oral comments delivered May 25, 2017 (LittleCherry_Spindler_062); Justin Stern, oral comments delivered May 25, 2017 (LittleCherry_Stern_061)
 10. Lower East Side Organized Neighbors (LESON)—written testimony delivered on May 25, 2017 (LESON_007) (LESON_054); petition delivered May 25, 2017 (LESON_Petition1_008); Maureen Koetz, oral comments delivered May 25, 2017 (LESON_Koetz_064); David Nieves, Member, oral comments delivered May 25, 2017 (LESON_Nieves_074); Antonio Queylin, Member, oral comments delivered May 25, 2017 (LESON_Queylin_080); Irene Shen, Member, oral comments delivered May 25, 2017 (LESON_Shen_077); David Tieu, oral comments delivered May 25, 2017 (LESON_Tieu_036)
 11. Partner Lower East Side Power Partnership—written testimony delivered on May 25, 2017 (LESPP_013); Vaylateena Jones, Executive, written testimony (LESPP_Jones_047) and oral comments (LESPP_Jones_072) delivered May 25, 2017
 12. Municipal Arts Society of New York—Marcel Negret, Project Manager, Planning and Preservation, letter dated May 30, 2017 (MAS_Negret_016)
 13. Two Bridges Task Force—letter dated June 8, 2017 (TBTF_052)
 14. Two Bridges Tower Resident Association—letter dated June 8, 2017 (TBTRA_055); Trevor Holland, President, oral comments (TBTTA_Holland_035) and written testimony (TBTTA_Holland_050) delivered on May 25, 2017; Grace Mak, Board Member, written testimony (TBTTA_Mak_012) and oral comments (TBTTA_Mak_028) delivered May 25, 2017
 15. Two Bridges Townhouses Condominium Board of Managers—letter dated June 7, 2017 (TBTHC_053)

GENERAL PUBLIC

16. Dr. Tom Angotti, written testimony (Angotti_011) and oral comments (Angotti_071) delivered May 25, 2017
17. Nancy Aroyon, oral comments delivered May 25, 2017 (Aroyon_039)
18. Francisca Benitez, written testimony (Benitez_010) and oral comments (Benitez_068) delivered May 25, 2017

Appendix B: Response to Comments on the Draft Scope of Work

19. Lauren Boyle, email dated May 30, 2017 (Boyle_018)
20. Alice Cancel, oral comments delivered May 25, 2017 (Cancel_085)
21. Matt Wolf & Carl Williamson, email dated May 30, 2017 (Wolf_019)
22. Alex Chow, oral comments delivered May 25, 2017 (Chow_076)
23. Brian Faucette, email dated May 25, 2017 (Faucette_003)
24. Audrey Hawkins, email dated May 25, 2017 (Hawkins_002)
25. Moi Hung, oral comments delivered May 25, 2017 (Hung_084)
26. Dashia Imperiale, oral comments delivered May 25, 2017 (Imperiale_075)
27. Lisa Kaplan, oral comments (Kaplan_030) and written testimony (Kaplan_048) delivered on May 25, 2017
28. Olympia Kazi, oral comments delivered May 25, 2017 (Kazi_067)
29. Jackie Klempay, email dated May 30, 2017 (Klempay_017)
30. Michael Kramer, email dated June 6, 2017 (Kramer_024)
31. Christopher Marte, oral comments delivered May 25, 2017 (Marte_027)
32. Ann McDermott, oral comments delivered May 25, 2017 (McDermott_069)
33. Tracy Mobley, oral comments delivered May 25, 2017 (Mobley_040)
34. Sam Moskowitz, email dated March 28, 2017 (Moskowitz_086), written testimony (Moskowitz_014) and oral comments (Moskowitz_065) delivered on May 25, 2017, and written testimony delivered on June 5, 2017 (Moskowitz_058)
35. Margaret Moy, email dated June 6, 2017 (Moy_021)
36. Oliver Newton, email dated May 30, 2017 (Newton_015)
37. Zishun Ning, oral comments delivered May 25, 2017 (Ning_082)
38. Williy Pang, email dated June 5, 2017 (Pang_023)
39. Maggie Ramirez, email (Ramirez_022) and letter (Ramirez_056) dated June 6, 2017
40. Jim Shelton and Renae Widdison, letter dated June 8, 2017 (Shelton_051)
41. Joseph Reyes, oral comments delivered May 25, 2017 (Reyes_070)
42. Dennis Riddle, oral comments delivered May 25, 2017 (Riddle_029)
43. Martin Rosenberg, oral comments delivered May 25, 2017 (Rosenberg_083)
44. Michelle Rosenberg, email dated June 8, 2017 (Rosenberg_057)
45. C Soto, oral comments delivered May 25, 2017 (Soto_066)
46. Pamela Thomas, oral comments delivered May 25, 2017 (Thomas_037)
47. Chen Yo, oral comments delivered May 25, 2017 (Yo_043)
48. Peter Yuen, email dated May 25, 2017 (Yuen_001)
49. Richard Yuen, oral comments delivered May 25, 2017 (Yuen_038)

50. Christina Zhang, oral comments delivered May 25, 2017 (Zhang_C_042)

51. Zheng Zhi Qing, oral comments delivered May 25, 2017 (Zheng_032)

C. COMMENTS AND RESPONSES

PROJECT DESCRIPTION

ACTIONS NECESSARY

Comment 1-1: The proposed project will introduce building forms to this neighborhood that are new to the district and contrary to local plans. These building forms were not considered possible under the LSRD plan that governs the area. The primary governance of the use, mass and plan of this site is the LSRD, not the underlying zoning. Considering the scale of the change proposed, the determination that this action is a minor modification of the LSRD should not rest solely on the underlying zoning. The amendment of the LSRD plan is not a minor modification. The proposed changes must be considered a major modification and subject to a full review under the Uniform Land Use Review Procedure (ULURP). (Angotti_011, Angotti_071, Benitez_068, Brewer_045, CB3_Rogers_005, GOLES_Ngok_034, Imperiale_075, Kaplan_030, Kaplan_048, LESON_007, LESON_054, LESON_Petition1_008, LESON_Tieu_036, NYCC_Chin_059, NYCC_Chin_060, Rosenberg_057, Shelton_051, TBTRA_055)

Response 1-1: Large-scale development regulations allow modifications to zoning requirements and large scale development plans may be amended at different points in time as they are intended to allow for design flexibility to achieve an overall better site plan. The Two Bridges LSRD has been amended several times since it was approved in 1972. The proposed projects likewise require modifications to the previously approved ULURP establishing the Two Bridges LSRD; however, the proposed projects would comply with the underlying zoning. In a letter dated August 11, 2016, Carl Weisbrod (the Chair of the City Planning Commission [CPC] at the time) explained that the proposed modifications will not require new waivers or zoning actions. He further explained that the modifications will not increase the extent of previously granted waivers, and that for these reasons, the Department of City Planning (DCP) determined that the modifications will be treated as minor modifications. The determination means that the actions do not trigger a requirement for a new ULURP review. In that letter, Chair Weisbrod stated that a full environmental review would be performed to ensure that the cumulative and project-specific effects are identified and addressed through the public process required by CEQR.

Appendix B: Response to Comments on the Draft Scope of Work

- Comment 1-2:** Require a quality review as part of the Environmental Impact Statement (EIS) to involve interested agencies. The following agencies must be involved in the DCP evaluation of the impacts of this and related projects: 1) Department of Housing and Urban Development (HUD) regarding funding issues, 2) the U.S. EPA regarding legal compliance under the Clean Water Act, 3) the State Department of Parks and Conservation regarding legal compliance requirement with the Clean Water Act, and 4) FEMA regarding floodplain construction issues. (LESON_007, LESON_054, LESON_Koetz_064, LESON_Petition1_008, LESON_Queylin_080, LESON_Tieu_036, Ning_082, Riddle_029, Yuen_038)
- Review of the Draft EIS (DEIS) must include involved parties: USEPA, NYSDEC, NYCDEP, HUD, and FEMA. (Benitez_010)
- Response 1-2:** The federal agencies identified in the comment are not undertaking or approving any action in connection with the proposed projects and an environmental review in accordance with the National Environmental Policy Act is not required. Similarly, the New York State Department of Environmental Conservation (NYSDEC) and the New York City Department of Environmental Protection (NYCDEP) are not directly undertaking an action associated with the proposed projects, and neither agency is an “Involved Agency” under SEQRA and CEQR. For the proposed projects, DCP, acting on behalf of CPC, is the CEQR lead agency; NYCDEP, the New York City Department of Parks and Recreation (DPR), the New York City Department of Transportation (NYCDOT), and the New York City Landmarks Preservation Commission (LPC) are interested agencies.
- Comment 1-3:** The State Environmental Quality Review Act (SEQRA) controls this process, not the *CEQR Technical Manual*. That Act also has many environmental quality review act regulations that control this process, not just the *CEQR Technical Manual*. And there are also City laws and an executive order by the mayor that are controlling in this process. So the *CEQR Technical Manual* is useful guidance. It is not what controls this process. (LESON_Koetz_064)
- Response 1-3:** As explained in the *CEQR Technical Manual*, SEQRA permits a local government to promulgate its own procedures provided they are no less protective of the environment, public participation, and judicial review than provided for by the state rules. See 6 NYCRR 617.14(b). The City of New York has exercised this prerogative by promulgating its own procedures, known as CEQR, in order to take into account the special circumstances of New York City’s urban environment. In 1973, before SEQR was enacted, New York City Mayoral Executive Order No. 87, entitled “Environmental Review of Major Projects,” adapted NEPA to

meet the needs of the City. After SEQR was enacted, New York City revised its procedures in Mayoral Executive Order No. 91 of 1977, which established CEQR. In 1989, amendments to the New York City Charter, adopted by referendum, established the Office of Environmental Coordination (OEC) and authorized the CPC to establish procedures for the conduct of environmental review by City agencies where such review is required by law. The Charter directs that such procedures include: (1) the selection of the City agency or agencies that are to be responsible for determining whether an EIS is required (i.e., the “lead” agency); (2) the participation by the City in reviews involving agencies other than City agencies; and (3) coordination of environmental review procedures with ULURP. The OEC was established by Executive Order within the Office of the Mayor as the Mayor’s Office of Environmental Coordination (MOEC). On October 1, 1991, the CPC adopted rules that were superimposed on Executive Order 91, reforming the City’s process. The additional rules, titled Rules of Procedure, are published in the Rules of the City of New York (RCNY) at 62 RCNY Chapter 5; the provisions of Executive Order No. 91 are published as an Appendix to 62 RCNY Chapter 5 and in 43 RCNY Chapter 6. The *CEQR Technical Manual*, first issued in 1993 and revised most recently in 2014, provides guidance to agencies in undertaking and completing the CEQR process and develops technical guidance and methodologies for environmental review.

Comment 1-4: To ensure meaningful community engagement and accountability, we recommend that the proposal undergo a formal ULURP process. (MAS_Negret_016, Shelton_051)

Response 1-4: DCP has determined that the modifications to the previously approved Two Bridges LSRD meet the criteria for a “minor modification.” ULURP applies to certain actions: changes to the City Map; mapping of subdivisions or platting of land into streets, avenues or Public Places; designation of change of zoning districts; Special Permits within the Zoning Resolution (ZR) requiring approval of the City Planning Commission (CPC); site selection for (City) capital projects; revocable consents, requests for proposals and other solicitations or franchises, and major concessions; improvements in real property the costs of which are payable other than by the City; housing and urban renewal plans and projects pursuant to city, state and federal law; sanitary or waterfront landfills; disposition of City-owned property; and acquisition of real property by the City. The proposed changes would alter elements of the prior approval of the Two Bridges LSRD, but would do so without increasing the extent of any existing waiver or requiring a special permit to modify the underlying zoning regulations. Because the proposed projects would be allowed under the existing zoning district regulations,

DCP has determined that a new ULURP review is not required since the proposed projects would not require a zoning district change or any other action subject to ULURP review.

Comment 1-5: The Notice makes further assertions that appear to either confuse, conflate, overlook, or disregard the clear procedures and requirements of the controlling ZR: “The Two Bridges LSRD Special Permit was originally approved by CPC on May 17, 1972 (CP-21885) and was last amended on August 23, 2013 (M120183 ZSM). The 2013 amendment was to allow for the development of a new mixed use building on Site 5, as well as the enlargement of existing retail use and the relocation of 103 existing accessory surface parking spaces into the new building. That proposed development did not occur. The LSRD Special Permit, as amended, remains in effect.” The ZR section 78-07 (Lapse of Authorization or Special Permit) states that any authorization or special permit granted by CPC pursuant to this Chapter shall automatically lapse if substantial construction has not been completed as set forth in Section 11-42 (Lapse of Authorization or Special Permit Granted by CPC Pursuant to the 1961 Zoning Resolution). That section indicates substantial construction must occur within four years of permit issuance, absence certain circumstances. The DCP should clarify why it believes the authorizations and/or special permits or special permit modifications issued to the cancelled Healthcare Chaplaincy Project regarding Site 5 in the LSRD remains in effect, and have not lapsed consistent with the ZR. (LESON_007, LESON_054)

Response 1-5: The Notice correctly stated that the special permit was originally approved in 1972 and was last amended in 2013. The proposed projects are not being constructed pursuant to the 2013 modification and it is not being studied as part of the No Action condition. Accordingly, the effectiveness of the 2013 modification is not relevant to the EIS.

Comment 1-6: It is not clear why the DCP is using terms such as “waiver” or “zoning actions” when the controlling provisions of the ZR refer to “authorizations” and “special permits.” (LESON_007, LESON_054)

Response 1-6: The three proposed projects would comply with the zoning district regulations mapped on the sites, and no discretionary use or bulk waivers would be required to facilitate the proposed projects. With the exception of the certification to waive certain use requirements on Site 6A, no discretionary waivers—whether pursuant to authorizations or special permits—are being sought. However, since the Two Bridges LSRD regulates the site plan and other features of development, modifications to the Two Bridges LSRD Special Permit are being requested from CPC. See also response to Comment 1-4.

Comment 1-7: The applicants and DCP must clarify: every separate “Authorization” or “Special Permit” that must be issued for each separate tower project, and the data, information, and evidence developed in the EIS that could support affirmative Findings under 78-313; a full description of the current Location of Buildings, and volumes associated with distribution of Bulk and Open Space, Total Floor Area, Lot Coverage, Dwelling or Rooming Units, as well as Modification of Height and Setbacks, alteration of Total Open Space, Light, Air, Congestion, and all other current site and community planning aspects, features, components, and volumes that will be altered by issuance of any authorization or special permit under ZR 78-311 or 78-312; explanation of how the addition of 4,775 residential units to LSRD sites currently governed by special permits, authorizations, open space, and infrastructure systems sustaining 1,300 can be viewed as “minor” modifications to the LSRD. (LESON_007, LESON_054)

Response 1-7: See Responses to Comments 1-4 and 1-6.

Comment 1-8: The DEIS should provide a full description of the rationale and findings of the original LSRD designation. (TBTRA_055)

Response 1-8: The EIS will provide a summary of the Two Bridges LSRD Authorizations and Special Permits as they relate to the proposed minor modifications.

DESCRIPTION OF SITES

Comment 1-9: The 70-story tower proposed on the NE corner of South and Clinton Streets would be constructed on a parcel which was committed by the NYC Environmental Protection Agency to be restored as the Land’s End children/Tenants Park. The Park was temporarily taken from the tenants, while the NYCEPA used it as a staging and excavation area for work required on the NYC Water Tunnel, which is adjacent and also situated on the property. Design Plans for the new park were presented to the Land’s End Tenants Association and a commitment made to return the space to its original purpose. We are requesting the commitment made by the NYCEPA to the Land’s End Tenants Association be honored and the parcel developed as originally designed and intended. (Ramirez_022, Ramirez_056)

Response 1-9: Comment noted.

Comment 1-10: Lot 76 is occupied by a one-story commercial building, but there is no specific limitation on the height of this single story building. The existing building could be reconstructed with the same floor area but with a height that would disrupt the proposed project’s cantilever or cause violations of the building and fire codes. Because the proposed cantilever will limit

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the height of a potential redevelopment of Lot 76 building, this matter should be disclosed. (LittleCherry_020, LittleCherry_Stern_061)

Response 1-10: The Draft Scope of Work describes the proposed Site 4 (4A/4B) project to include a new building cantilevering over the existing one story Lot 76 building. Modifications to the Lot 76 building are not proposed as part of the project and will not be studied in the EIS. The comments with respect to building and fire codes are unrelated to the Draft Scope of Work.

PURPOSE AND NEED FOR THE PROPOSED ACTIONS

Comment 1-11: The purpose and need for the proposed action needs to better justify the scale of the change and how the proposed development is consistent with the development goals of the Two Bridges LSRD. (CB3_Rogers_005)

The Draft Scope of Work fails to identify a purpose or need for the proposed action consistent with public benefits intended by the creation of an LSRD, or other benefits to the City of New York or its taxpayers. According to SEQRA, the description of the proposed action should contain “the purpose or objective of the action, including any public need for, or public benefits from the action, including social and economic considerations, and identification of authorizations, permits and approvals required.” (6 CRR-NY 617.9(b)(5)) The Purpose and Need section must describe the documented purpose and need for the towers, and should describe goals, outcomes, policies, or plans achieved by constructing these projects and how they will achieve the general purposes of the LSRD. The documented purpose and need for the towers themselves, and the concomitant issuance of any and all authorizations or special permits under ZR Article VII, Chapter 8 for the projects compliant with the provisions of ZR 78-01: General Purposes must be described. (LESON_007, LESON_054, LESON_Petition1_008)

Response 1-11: The EIS is intended to inform the decision makers of the projected effects of the proposed actions, and will include a discussion of the purpose and need of the projects in order to provide information necessary so that decision makers can weigh any environmental impacts against relevant social, economic, and other relevant considerations. See also response to Comment 1-7.

Comment 1-12: The DCP Notice and Draft Scope of Work both fail to describe in sufficient detail the exact nature of the authorizations or special permits required or actually sought for the projects. (LESON_007, LESON_054)

Response 1-12: See Responses to Comments 1-4, 1-6, and 1-7. The Final Scope of Work includes a description of the proposed actions, including proposed modifications for the project sites, that are being requested pursuant to

the Minor Modification process. The modifications will also be illustrated in figures.

Comment 1-13: ZR § 78-313 requires the CPC to issue affirmative “Findings” that the proposed authorizations and/or special permits under ZR §§ 78-311 or 78-312 won’t interfere with neighborhood character, restrict air and light access or privacy, introduce detrimental building bulk, or create traffic congestion. (Benitez_010)

The EIS will be required to contain sufficient evidence that the proposed actions will conform to the findings required for the issuance of the Special Permit sought from the lead agency. (LESON_007, LESON_054)

Response 1-13: Information contained in the EIS may inform the CPC, as the decision maker, in formulating any findings it will make. However, there is no “requirement” that the EIS contain “sufficient evidence” that projects will conform to findings under the Zoning Resolution. As noted on page 17 of the Draft Scope of Work, an EIS is being prepared in accordance with CEQR. CEQR’s mandate is to assure that governmental agencies undertaking actions within their discretion take a “hard look” at the environmental consequences of each of those actions so that all potential significant environmental impacts of each action are fully disclosed, alternatives that reduce or eliminate such impacts are considered, and appropriate, practicable measures to reduce or eliminate such impacts are adopted.

Comment 1-14: Based on procedures for the Two Bridges LSRD Plan and permits first issued by CPC in CP-21885, further authorizations and special permits are only granted after public hearing, investigation, and study that provide adequate legal basis to determine that such authorizations and special permits “conform with the findings required under ZR Section 78-313...,” and a resolution is published by the CPC confirming such findings.

Segmented or insufficiently scoped analysis could result in insufficient evidence to issue legal supportable findings under ZR Section 78-313.

DCP, MOEC, and all regulatory and approval offices including the Office of the Manhattan Borough President must fully explain that the LSRD Modifications are subject to study, investigation, and hearing procedures for issuing Findings under ZR 78-313, and the Scope of the EIS should include or cross reference all evaluation of the project carried out under ZR sections 78-311, 312, and 313. The Final Scope of Work should be updated to make clear that the ZR affirmative standards are applicable and must be met. (LESON_007, LESON_054)

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- It is not clear how the proposed action fits under the LSRD land use decision-making process. (TBTRA_055)
- Response 1-14:** The potential environmental impacts of the proposed projects will be fully assessed in the EIS in accordance with CEQR. See also response to Comment 1-13.
- Comment 1-15:** There is no stated purpose for the proposed action. Why is the extra FAR needed? (Kazi_067, LESON_Koetz_064)
- Response 1-15:** See response to Comment 1-11.
- Comment 1-16:** The EIS must call for a full description and a rationale as to why the original intent of providing low-, moderate-, and middle-income housing is not being acted on. (TBTTA_Holland_035, TBTTA_Holland_050)
- Response 1-16:** See response to Comment 1-11. Notably, the proposed projects will provide substantial amounts of new affordable and market rate housing.
- Comment 1-17:** This proposed building project is part of an avalanche of mega towers that has engulfed Manhattan, dramatically altering the very fabric of NYC life and culture. Now that it is hitting the historic Lower East Side or the “Gateway of America,” and perhaps some serious consideration will be given to whether these towers are necessary, appropriate and in the best interest of this community. (Ramirez_022)
- Response 1-17:** Comment noted.
- Comment 1-18:** These developments should not be allowed to come into the area. They’re just out of context. (Zhang_C_042)
- Response 1-18:** Comment noted.
- Comment 1-19:** This overdevelopment and hideous architecture must be stopped, including the tower being built on the corner of Cherry Street right now. (McDermott_069)
- Response 1-19:** Comment noted.

PROPOSED ACTIONS

- Comment 1-20:** It is unclear if the developments are completely as-of-right under the C6-4 zoning. (CB3_Rogers_044)
- Response 1-20:** As noted on page 5 of the Draft Scope of Work, while the proposed projects require modifications to the Two Bridges LSRD controls, they would comply with and be allowed as-of-right under all provisions of the underlying zoning district regulations for the sites.

Two Bridges LSRD

Comment 1-21: The scope of work should specify each individual authorization or special permit for each separate project. (LESON_Shen_077, LETTA_Castro-Negron_073)

Response 1-21: The proposed projects each require a minor modification to the previously approved Two Bridges LSRD and Site 6A would require a certification pursuant to ZR Section 32-435 to waive the ground-floor retail requirement along Clinton Street. The proposed modifications would allow for the development of three new mixed-use buildings each of which would comply with the underlying district regulations applicable. No use or bulk waivers would be required to facilitate the proposed projects. See also response to Comment 1-6.

ANALYTICAL FRAMEWORK

Comment 1-22: The EIS framework should require the broadest boundaries and include thorough analysis in every aspect, from socioeconomics to the capacity of our public health resources. (NYCC_Chin_059, NYCC_Chin_060)

Response 1-22: The analyses prepared for the EIS will follow the methodologies presented in the *CEQR Technical Manual* and provide a conservative assessment of the potential of the projects to result in significant adverse impacts.

Comment 1-23: Short- and long-term effects, typical associated environmental effects, and adverse environmental impacts that “cannot be avoided” must include any and all resulting from construction, permanent alterations, operation, and maintenance of the proposed project, particularly those that can cause or contribute to compliance interference or violations of law by proponents or any agency of the City.

Irreversible and irretrievable commitments of resources analyzed must include the construction, operations, and maintenance activities occurring during the useful life of the proposed project, including but not limited to all affected airshed, airspace, water discharge carrying capacity, drinking water, land, open space, and light as well as City roads, schools, pipes, fuel/ energy, and all other physical infrastructure systems, whether used in the immediate geographic area of the project, or used through transport, migration, distribution, or other direct and indirect means as assets and resources that would be involved and committed if the proposed project is built and operated over its useful life. (LESON_007, LESON_054)

Response 1-23: The DEIS will analyze the potential for significant environmental impacts for both the construction and operational phases of the proposed projects. As noted on page 36 of the Draft Scope of Work, the construction assessment will focus on areas where construction activities

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may pose specific environmental problems. The construction impact assessment will evaluate the duration and severity of the disruption or inconvenience to nearby sensitive receptors and will be based on a conceptual construction schedule for the proposed projects with anticipated construction duration for each of the proposed projects, and will focus on the cumulative construction effects of the proposed projects. This assessment will describe the likely construction schedule and logistics for each project, discuss anticipated on-site activities, and provide estimates of construction workers and truck deliveries.

As noted on page 18 of the Draft Scope of Work, the EIS also will include an assessment of irreversible and irretrievable commitments of resources that would be involved if the projects are constructed.

Comment 1-24: The projects effects on the City’s land, air, water, and physical infrastructure systems must be evaluated and analyzed for an area well beyond the immediate blocks in and around the Two Bridges LSRD. Failure to do this would constitute improper segmentation. (LESON_007, LESON_054)

Response 1-24: As noted in the Draft Scope of Work, the EIS will include an analysis of the projects’ effects on land use, zoning, and public policy, air quality, and water and sewer infrastructure, among other analysis areas, consistent with the methodology provided in the *CEQR Technical Manual*. The analyses will include consideration of background projects expected to be complete by the projects’ Build year within study areas that extend beyond the project sites. The EIS will consider the individual and the cumulative impacts of the proposed projects. Further, the EIS will consider the potential for operational impacts and construction-phase impacts.

Comment 1-25: The scoping draft frames the parameters of study for the EIS in a way that conceals the severe impact this mega development will have on the surrounding area. (Kazi_067)

Response 1-25: The EIS will consider the potential of the proposed projects to have significant adverse impacts in the surrounding area.

Comment 1-26: The EIS must look at this as a new neighborhood and include all qualifiers, including Rutgers housing, LaGuardia, and the historical history in South Street. (TBTTA_Holland_035, TBTTA_Holland_050)

Response 1-26: The EIS will examine the potential for significant adverse impacts on the full range of environmental areas assessed under CEQR. See also response to Comment 1-25.

CUMULATIVE IMPACTS

Comment 1-27: There is a need to analyze these three projects not just together, but also in the greater context of Two Bridges and the Lower East Side. The Lower East Side has faced a construction boom in recent years. The EIS should consider the cumulative impacts from all projects, including Essex Crossing/Seward Park, Extell at 250 South Street, 30 Pike Street, the New York City Housing Authority's (NYCHA) proposed market rate and affordable housing at LaGuardia Houses, the Lower Manhattan Coastal Resiliency Project, the East Side Coastal Resiliency Project. Taken together, these development projects will bring thousands more units to the neighborhood, further stressing the community's affordability, infrastructure, schools, parking and transit. Cumulative impacts from gas emissions of cars, floods, lack of services, and cumulative demands on hospitals, parking, schools, transportation, water and sewer infrastructure, energy, and other essential services should be analyzed. We strongly urge the City consider the cumulative impact from all of the nearby development in the EIS. (Benitez_010, Brewer_004, Brewer_045, GOLES_Ngok_034, Hawkins_002, Klempay_017, LEOTA_Gonzalez_079, LESON_007, LESON_054, LESON_Petition1_008, LESON_Queylin_080, LESON_Tieu_036, Marte_027, Moskowitz_014, Moskowitz_065, Newton_015, Riddle_029, Rosenberg_057, Shelton_051, Squadron_006, TBTF_052, TBTHC_053, TBTRA_055, TBTTA_Holland_035, TBTTA_Holland_050, TBTTA_Mak_012, Wolf_019, Yuen_038)

Response 1-27: The analyses to be presented in the EIS will include an assessment of future conditions without the proposed actions (No Action condition), which considers known background projects that would be developed independent of the proposed projects, by the project's Build year, within each technical area's respective study area boundaries. The assessment of future conditions with the proposed actions (With Action condition) will take these background projects into account in analyzing the potential of the proposed projects to result in significant adverse impacts.

Comment 1-28: The list of projects expected to be built in the study area (No Action projects) should be cross-referenced with the soft-sites collected in the Chinatown Working Group plan to ensure that none are missed. (CB3_Rogers_005)

Response 1-28: Depending on the analysis area, No Action projects within 400 feet, ¼-mile, ½-mile, and 1.5 miles from the project sites will be considered in the EIS.

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- Comment 1-29:** The EIS must also look at the remaining local air rights which surprisingly still total quite a bit. (TBTTA_Holland_035, TBTTA_Holland_050)
- Response 1-29:** The EIS will analyze the potential effects of the proposed actions. Use of any additional development rights is not contemplated at this time. If use of additional development rights is contemplated in the future, that action would be subject to its own CEQR review at a future date.
- Comment 1-30:** We strongly oppose this proposal unless the City takes the required hard look at the likely long-term harmful effects on the Two Bridges neighborhood. (MAS_Negret_016)
- Response 1-30:** As noted on page 17 of the Draft Scope of Work, New York City has formulated an environmental review process, CEQR, pursuant SEQRA and its implementing regulations (Part 617 of 6 New York Codes, Rules and Regulations). The City’s CEQR rules are found in Executive Order 91 of 1977 and subsequent rules and procedures adopted in 1991 (62 Rules of the City of New York, Chapter 5). CEQR’s mandate is to assure that governmental agencies undertaking actions within their discretion take a “hard look” at the environmental consequences of each of those actions so that all potential significant environmental impacts of each action are fully disclosed, alternatives that reduce or eliminate such impacts are considered, and appropriate, practicable measures to reduce or eliminate such impacts are adopted. The EIS will be prepared in accordance with CEQR requirements.
- Comment 1-31:** So many changes have come to this community over the years (9/11, Superstorm Sandy, bike lanes, etc.), but nothing to the scale and magnitude of this project, with such major construction and tall towers within a few blocks. (Aroyon_039)
- Response 1-31:** The EIS will analyze the effects of the proposed projects on neighborhood character, in consideration of land use, zoning, and public policy; socioeconomic conditions; open space; shadows; historic and cultural resources; urban design and visual resources; transportation; and noise. The analysis will be presented in Chapter 19, “Neighborhood Character” of the EIS.
- Comment 1-32:** Our Two Bridges area is rampant with hazardous traffic, transit, pedestrian/vehicle safety and parking conditions that are aggravated from the lack of enforcement and the absence of sensible local transit planning. These proposed developments will intensify these conditions during and after construction, unless these issues carefully examined and mitigations are implemented. (TBTTA_Mak_012)

Being unable to handle such an influx of people, local transportation is already overprescribed [sic]; parking and street traffic, schools are already full. (Aroyon_039)

Response 1-32: The EIS will include an analysis of traffic, transit, pedestrian, parking, and safety in the Transportation chapter, as well as an analysis of transportation during the construction phase. The EIS will also include an analysis of schools in accordance with *CEQR Technical Manual* methodology. Mitigation measures will be identified for any significant adverse impacts.

ILLUSTRATIONS

Comment 1-33: The drawings that describe the proposed projects are not detailed enough. They have errors and need improvements and additions of the scope so the regulatory action is clear. (CB3_Rogers_005, CB3_Rogers_044)

Response 1-33: The drawings and figures in the Draft Scope of Work have been updated and clarified for the Final Scope of Work.

LAND USE, ZONING, AND PUBLIC POLICY

Comment 2-1: The [land use] study area should be increased to at least a half-mile radius, to include the portions of the neighborhood most likely to be impacted as well as adjacent areas that will receive new development, extending north to Delancey Street. (TBTRA_055)

The land use study area must be larger than a quarter-mile; it should be a ½-mile to include surrounding projects like Extell, Essex Crossing/Seward Park, NYCHA infill, etc. (Brewer_004, Brewer_045, CB3_Rogers_005, CB3_Rogers_044, GOLES_Ngok_034, LEOTA_Richardson_081, LESON_Shen_077, TBTF_052, TBTRA_055)

Response 2-1: Study area boundaries used for the various EIS analyses have been developed in consultation with the lead agency and follow the guidance of the *CEQR Technical Manual* for each individual technical area.

The ¼-mile land use study area was chosen based upon the guidance contained in the *CEQR Technical Manual* and in consultation with the lead agency. The study area is large enough to capture the immediate effects of the proposed project, which typically occur within 400 feet and secondary impacts, which may be experienced beyond 400 feet.

Comment 2-2: In addition to completing the Waterfront Revitalization Program (WRP) Consistency Assessment Form, the DEIS should include analysis of how the combined developments will adhere to the 44 policies (relevant to these developments) of the NYS Coastal Management Program, if the

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development shall receive any funding or financing from the State of NY as required by the NYS Coastal Management Program. (CB3_Rogers_005, CB3_Rogers_044)

Response 2-2:

The New York State Waterfront Revitalization of Coastal Areas and Inland Waterways Act enables municipalities to adapt statewide policies to local coastal management programs. The New York City Waterfront Revitalization Program has been approved by the New York State Secretary of State as a local coastal management program, and therefore projects within the City's Coastal Zone are subject to review for compliance with the City's program. As noted on page 20 of the Draft Scope of Work, the project sites are located within the coastal zone designated by New York State and New York City; therefore, the proposed projects are subject to a review for compliance with the City's Coastal Zone management policies. The EIS will include a description of existing Coastal Zone policies and the City's Waterfront Revitalization Program (WRP) and present an assessment of the projects' consistency with the City's WRP in the Land Use, Zoning, and Public Policy chapter.

Comment 2-3:

The EIS must include a fully completed NYC Waterfront Revitalization Program Consistency Assessment Form (WRP CAF) and supporting data including but not limited to disclosure of federal funds used (including Section 8 payments, or financing securitized by Section 8 or other federal payments or subsidies for housing); effects on water quality designations due to combined sewer overflows in the Newtown Creek drainage basins; direct and indirect discharges, including toxins, hazardous substances, and other pollutants, effluent, and waste in the East River, the Newtown Creek, New York Harbor, and all water affected by sewage collection, treatment, or failure thereof. The WRP CAF cannot and should not be limited to flood hazard and sea level rising mentioned as the text of the bullet point on Page 20 of the Draft Scope of Work appears to suggest. The significant problems and effects of constructing in this coastal floodplain evidenced by the Extell Tower construction must inform the WRP CAF. Foundation issues, cracking and water intrusion to nearby buildings, interference with existing infrastructure (e.g., steam pipes) all support evaluation of the efficacy of constructing in this area of Manhattan Island. For these and other reasons, the Federal Emergency Management Agency (FEMA) and the NYS Department of State (NYSDOS) are Involved Parties in the Two Bridges EIS and must participate in its preparation. (LESON_007, LESON_054, TBTRA_055)

Response 2-3:

No discretionary State or Federal approvals are anticipated for the proposed projects and the FEMA and the NYSDOS are therefore not involved agencies for the purposes of this environmental review. The EIS

will include a WRP CAF, prepared in accordance the requirements and policies of the WRP.

SOCIOECONOMIC CONDITIONS

Comment 3-1: The study area should be expanded to a ½-mile radius and drawn to include adjacent Manhattan neighborhoods of Chinatown and the Lower East Side, up to Delancey Street and including census tracts that are predominantly Latino and Asian. The study area boundaries should be the East River, the Manhattan Bridge, Bowery and Delancey Street. (Shelton_051, TBTRA_055)

Response 3-1: Study area boundaries used for the various EIS analyses will be developed in coordination with the lead agency and will follow the guidance of the *CEQR Technical Manual* for each individual technical area. According the *CEQR Technical Manual* guidance, the study area for Socioeconomic Conditions typically encompasses a project area and adjacent areas within approximately 400 feet, ¼-mile, or ½-mile, depending upon the project size and area characteristics. According to the *CEQR Technical Manual*, the larger ½-mile study area is appropriate for projects that would potentially increase the ¼-mile area population by more than five percent.

Comment 3-2: The EIS should include a study of direct and indirect displacement of residents and small businesses. (Benitez_068, CB3_Rogers_044)

Response 3-2: As detailed in the Draft Scope of Work, the Socioeconomic Conditions chapter of the EIS will include a study of direct and indirect displacement of residents and businesses. The study will include consideration of effects on small businesses.

Comment 3-3: This project will create overcrowding, resulting in primary and secondary displacement. (Imperiale_075)

Response 3-3: Comment noted. As detailed in the Draft Scope of Work, the Socioeconomic Conditions chapter of the EIS will include assessments of primary and secondary residential and business displacement.

Comment 3-4: What does this project mean for the cultural displacement in the neighborhood? (CAAAV_Dang_33)

Response 3-4: As detailed in the Draft Scope of Work, the Socioeconomic Conditions chapter of the EIS will assess the proposed projects' potential effects on the neighborhood's socioeconomic character, which includes its population, housing, and economic activity. The Neighborhood Character chapter of the EIS will consider a number of factors—including land use, zoning, and public policy; socioeconomic conditions; open

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space; urban design and visual resources; shadows; transportation; and noise—in evaluating the proposed projects’ effects on neighborhood character.

Comment 3-5: In terms of jobs, there should be union jobs for the people from zip code 10002; a breakdown is necessary, too, to see how many people actually do get jobs. (LESPP_Jones_047, LESPP_Jones_072)

Response 3-5: Comment noted. The Socioeconomic Conditions analyses in the EIS will follow *CEQR Technical Manual* methodology in determining the potential for significant adverse impacts. *CEQR Technical Manual* methodology does not include estimates of the economic benefits that would be generated by a project. Therefore, it is outside the scope of CEQR to consider the numbers and types of local area residents who may secure employment from the proposed projects’ construction or operations.

Comment 3-6: LESPP advocates for new housing construction or enlargement at rents that will not substantially alter the present mix of income groups or reduce the number of units. (LESPP_013, LESPP_Jones_047, LESPP_Jones_072)

Response 3-6: Comment noted.

Comment 3-7: With 75 percent the new tenants being market rate, and Extell’s one to three million dollar condominiums, the socioeconomic character is going to drastically alter. (LEOTA_Gonzalez_079)

Response 3-7: Comment noted. As detailed in the Draft Scope of Work, the Socioeconomic Conditions chapter of the EIS will assess the potential effects of the proposed projects on the socioeconomic character of the area.

Comment 3-8: The Scope of Work must also include all aspects of the socio-economic conditions studied, investigated and used to make the ZR Section 78-313 Findings prior to issuance of the Special Permit. Because this proposed construction affects a Large Scale Residential Development Zoning Area, the assessment is not limited to the categories outlined in the *CEQR Technical Manual*, but must also evaluate outcomes and long term effects under the standards set forth in Section 78-01 of the ZR of the City of New York. (LESON_007, LESON_054)

Response 3-8: Consistent with CEQR, the EIS must disclose the potential for the actions to result in significant adverse environmental impacts. The methodology advanced in the Draft Scope of Work and *CEQR Technical Manual* will be used determine the potential for significant adverse impacts to socioeconomic conditions as defined by CEQR. The CPC may consider

information in the EIS in making findings under the Zoning Resolution, insofar as it is relevant and appropriate.

DIRECT RESIDENTIAL DISPLACEMENT

Comment 3-9:

I am concerned about the safety and health of the seniors at 80 Rutgers Slip who will be moved as a result of the construction of a building that will cantilever over theirs. Elected officials should see any relocation plans for the seniors who live in the apartment lines being built over as soon as possible, and that these plans be completed and viewed by the elected officials in advance of any approval of the FEIS. (Brewer_004, Brewer_045, NYCC_Chin_059, NYCC_Chin_060)

I have great concerns for the seniors, who live at 80 Rutgers Slip. The peaceful, quiet, comfortable, prosperous, quality of life that these seniors have enjoyed all these years, will soon be abruptly eradicated and temporarily displaced for construction of a 79-story/ 1,008-sf-tall building, cantilevering over their home. One of the seniors said “They are putting a building on the top of my head.” This type of proposed development is disheartening, unethical, unjustifiable, and it’s dehumanizing treatment towards our most vulnerable senior residents to build 495 luxury market rate units and 165 affordable apartments. Our seniors (many with serious health conditions and/or are immobile) deserve to be treated honorably, respectfully, with compassion and be allow to live out their full term of retirement life peacefully in the comfort of their permanent homes. We intend to strongly advocate against developers who want to displace, harass, evict or relocate vulnerable residents (seniors and non-English speaking residents) from their homes.

There is already senior housing crisis and with the JDS project, it doesn’t make sense to permanently eliminate or vacate 1019 viable senior housing units; while the city should be seeking to develop more reasonable, affordable, low income housing for seniors.

We ask for full disclosure and transparency of 10-19 units relocation plans for senior residents at 80 Rutgers Slip, including how relocation or supplement costs will be worked out for those residents, the period of time span they’ll be relocated, what other type of a commendations would be made for them. (TBTF_052, TBTRA_055, TBTTA_Holland_050, TBTTA_Mak_012, TBTTA_Mak_028)

LESPP advocates that: a relative be contacted for each Senior that is temporarily displaced; translation services for all Seniors for whom English is not their first language be provided; the Manhattan Borough President office be informed of the Senior’s name, apartment# displaced from and to, age, date of displacement and when they are returned home; the Manhattan Borough President’s office meet with community leaders

and share age, date of displacement and when they are returned to their homes; special consideration and services for those seniors who are extremely anxious concerning moving and changing their routine be provided; Seniors who are displaced but would like to stay in the displaced apartment be allowed to do this; consideration of extra assistance for those who do not want to leave their home and need to be displaced for construction purposes; all Seniors who want to return to their homes to be able to do so. (LESPP_013, LESPP_Jones_047)

Disclose specific relocation plans for the residents of the ten units at 80 Rutgers Slip, including how relocation costs will be addressed for those residents, the duration of time they will be relocated, where they will be housed and under what conditions, and what costs will be incurred and by whom. (CB3_Rogers_005, CB3_Rogers_044)

Response 3-9: Comments noted. 80 Rutgers Slip is under a HUD regulatory agreement wherein residents can only be moved under a relocation plan approved by HUD. A pre-approved relocation plan has been obtained from HUD by the Site 4 (4A/4B) applicant. A final relocation plan is also subject to HUD's approval, and would be obtained prior to the start of construction at Site 4 (4A/4B). Chapter 3, "Socioeconomic Conditions," of the EIS will include a description of relocation plans for residents of 80 Rutgers Slip who may be temporarily or permanently displaced from their current housing units as a result of the proposed Site 4 (4A/4B) development.

Comment 3-10: LESPP would like JDS Development Group, the developer for 247 Cherry Street, to consider and analyze the concerns and approaches to Senior Displacement stated above. (LESPP_013, LESPP_Jones_047, LESPP_Jones_072)

The EIS needs to look at senior displacement and answer the question of: What happens when a 90-year-old senior says, No, you're not going to evict me from my home? (TBTTA_Holland_035, TBTTA_Holland_050)

Response 3-10: The Socioeconomic Conditions assessment in the EIS will follow *CEQR Technical Manual* guidelines in determining the nature and level of assessment warranted for all socioeconomic issues of concern, including potential direct residential displacement. Please also see the response to Comment 3-9.

INDIRECT RESIDENTIAL DISPLACEMENT

Comment 3-11: Throughout the pre-draft scope meetings with the community, the Task Force surveying of residents, and in public hearing testimony, concerns and anxiety about individual and widespread displacement dominated the list of local concerns. Considerable attention must be paid to the projects' indirect displacement impacts. Indirect displacement is not adequately

examined under current CEQR guidelines. The distinctions set up by CEQR between “hard” impacts--those associated with the natural environment such as air quality and traffic, and “soft” impacts such as indirect displacement and impacts on school capacity is flawed and results in minimization of the real human costs of development projects. (TBTRA_055)

Response 3-11: Comment noted. *CEQR Technical Manual* methodologies and guidelines allow for a conservative assessment of the potential for significant adverse environmental impacts as defined under CEQR.

Comment 3-12: DCP must examine data around rent-regulated units, tenant harassment, evictions in the area and work with local CBOs in this effort. (Brewer_045)

Response 3-12: Comment noted. The Socioeconomic Conditions chapter of the EIS will present estimates of the number of rent-regulated units in the study area, and will identify specific buildings with rent-regulated units. With respect to data on tenant harassment and evictions, please see the response to Comment 3-19.

Comment 3-13: The Step 1 analysis described in the Draft Scope of Work must look beyond income. To be comprehensive and accurate, the Step 1 analysis must include race, level of educational attainment, rent burden, overcrowding, and linguistic isolation, key factors that would provide a more accurate picture of those made vulnerable by the addition of new population with higher income. (TBTRA_055)

Response 3-13: The *CEQR Technical Manual* sets forth a step-by-step preliminary assessment process to understand the level of analysis that is necessary, as well as guidance on the types of data that should be considered. The Step 1 assessment is expected to include existing condition and trend data on the study area’s average and median household incomes, income distribution, and rent trends. If the Step 1 assessment cannot determine that the proposed projects would not result in significant adverse displacement impacts, the assessment will continue with additional steps that consider additional data and factors. The assessment will not present information on overcrowding or linguistic isolation. Please see response to Comment 3-18.

Comment 3-14: The Step 2 analysis is unduly vague. What threshold is being utilized to evaluate whether the impact is “large enough to affect real estate market conditions” and how is the impact being determined? (TBTRA_055)

Response 3-14: As noted in the *CEQR Technical Manual* (page 5-3), thresholds are based on the City’s review of recent applications that included detailed

assessments or resulted in significant adverse impacts on socioeconomic conditions, and would, for most projects, serve as an indication of when further analysis is recommended. The *CEQR Technical Manual* provides the lead agency with the necessary flexibility to determine whether unique project circumstances warrant additional analysis.

Comment 3-15: Step 3 states that no further analysis is necessary if the area is already experiencing a readily observable trend toward increasing rents. It is highly possible that the analysis will cite projects such as Extell as evidence that such a trend exists. However, such a trend, and the speculative forces that propel the trend, are the reasons that people are losing their homes because of increases in rent, loss of preferential rents, conversions to market rents. As identified in the CEQR guidelines, further analysis should be performed regardless of trend, to obtain adequate information about the acceleration of market force impacts. (TBTRA_055)

Response 3-15: *CEQR Technical Manual* methodology requires an estimate of a proposed project's incremental contribution to future market conditions, because it is that incremental change created by a project that is the determining factor for project-generated impacts. The analysis uses current trends to project future conditions without and with the proposed projects.

Comment 3-16: I ask that DCP look not just at the types of real estate data listed in the Draft Scope of Work, but also at how the introduction of a block of market-rate units can affect a neighborhood's affordability long-term. The NYU Furman Center's report on gentrification shows how an influx of market-rate units may further accelerate gentrification and indirect displacement in this neighborhood. (Brewer_004)

Our neighborhood and neighbors won't survive the influx of so many wealthy, market-rate tenants. (Rosenberg_057, Shelton_051, TBTRA_055)

All of Community Board 3 has seen rampant gentrification for at least a decade. In May 2016, the NYU Furman Center published a report on gentrification in New York neighborhoods and found the Lower East Side/Chinatown area to be gentrifying at the third-most drastic pace in New York City. (Brewer_004)

The three projects would inject a large upper-income population in a neighborhood of low- and moderate-income housing which is vulnerable to privatization and conversion to market-rate housing. The current proposal would add 2.5 million square feet of residential space. CPC also did not anticipate the intensive pressures of gentrification and

displacement facing the entire community or the prospect of market-rate housing on NYCHA land, now a real prospect. (Angotti_011, Brewer_004)

The gentrifying pressure that these towers will inevitably have in the long term is something which we cannot afford. (Kazi_067)

To be comprehensive and accurate, the presentation of study area characteristics must also include an examination of the number and demographic make-up of local residents who are losing preferential rents in subsidized housing and the availability of equivalently priced housing in the vicinity. This data is available from ANHD, ProPublica, the Furman Center, and local housing groups. If the area is already experiencing displacement, and the proposed developments accelerate the rate of displacement, then mitigations to address displacement must be put in place. (TBTRA_055)

Response 3-16: The Socioeconomic Conditions chapter of the EIS will apply *CEQR Technical Manual* methodology and guidelines in its assessment of potential indirect residential displacement resulting from the proposed projects' introduction of market rate and affordable dwelling units. The NYU Furman Center report referenced by the commenter will be reviewed for potential applicability for the assessment.

Comment 3-17: There's a lack of grocery stores, convenience stores, and other resources for even the current residents of the area. Adding people and stores that the people cannot afford will severely displace the residents. (Yuen_001)

Response 3-17: Comment noted. As detailed in the Draft Scope of Work, the Socioeconomic Conditions chapter of the EIS will include an assessment of potential indirect business displacement that includes consideration of potential effects on neighborhood grocery and other convenience stores, including changes in price point.

Comment 3-18: Indirect displacement should also attempt to identify the people who are most at risk: especially those who do not speak English as a first language, so a mitigation program can be developed that is able to reach those most in need. (CB3_Rogers_005, Zhang_C_042)

Response 3-18: The EIS analysis of potential indirect displacement will follow the methodologies described in the Final Scope of Work and the *CEQR Technical Manual* to identify populations at risk of displacement. If potential significant adverse impacts are identified requiring mitigation, English proficiency would be considered in designing mitigation to support any identified population(s) at risk.

Comment 3-19:

The developers are not going to study the secondary displacement impact of this development on surrounding subsidized housing, even though it is directly surrounded by thousands of units of low-income housing. (Klempay_017, Newton_015, Wolf_019, Zhang_C_042)

It is by no means only those who pay market-rate rents who face indirect residential displacement, nor are rising rents the only tool that landlords use to force tenants out. Rent-regulated Chinatown tenants may have certain protections, but they face powerful indirect residential displacement pressures. Rent-regulated tenants are absolutely by no means immune to socioeconomic changes in the neighborhood. (CAAAV_Wang_031, CAAAV_Wang_046, Hawkins_002, GOLES_Ngok_034, Shelton_051, TBTF_052)

Tenant harassment and abuse should be examined. This is another reason why the scope should be expanded to include rent-regulated and/or stabilized tenants. In order to exploit loopholes in real estate regulation and tenant protection provisions under these circumstances, landlords deploy a variety of tactics: using construction as harassment to create health hazards, allowing gas or hot water to be turned off, neglecting to make repairs, or aggressive and intimidating attempts to buy out tenants. (Brewer_004, LEOTA_Richardson_081, LESPP_Jones_047, LESPP_Jones_072)

Landlords harass tenants and take buyouts. There are also less direct tactics, such as construction-based harassment. (CAAAV_Wang_031, CAAAV_Wang_046)

There must be an examination of the potential of the projects to accelerate the trend of changing socioeconomic conditions that will potentially displace vulnerable populations. In addition to data from the Census, RPAD, and current real estate market data, the analysis must also include data sets and information that correlate more directly with potential displacement risk. These sources should include eviction and foreclosure data for the past five years, building and alteration permits, demolition permits, complaints of landlord harassment, an inventory of currently regulated building stock that will soon expire, all subsidized, rent regulated and/or stabilized apartments, an inventory of local requests for Right to Counsel, and interviews with local housing groups who counsel tenants who have been subject to harassment, discrimination, and displacement. ANHD's (2017) Affordable Housing Vulnerability report, using data from 2015 and 2016, has found that Chinatown/LES ranks among the highest citywide in numbers of LIHTC units eligible to expire in the next five years (1933) and highest in at-risk Mitchell-Lama units (1244), and at-risk HUD-subsidized units (605). The three proposed projects are highly likely to accelerate the loss of these units; therefore,

these units and others mentioned above must be included in the calculation of indirect displacement. (TBTRA_055)

Response 3-19: The analysis of indirect (or secondary) residential displacement will follow the methodology outlined in the Final Scope of Work and guidelines of the *CEQR Technical Manual*. Residential tenants are afforded protection against displacement through state rent regulations, regulations guiding the conversion of rental units to co-operatives or condominiums, and provisions against the harassment of tenants. Despite the protection afforded tenants under rent control and rent stabilization, tenants can be forced out of their apartments through illegal activities, such as harassment by landlords. Both the New York City Department of Housing Preservation and Development (HPD) and New York State Department of Homes and Community Renewal (HCR) administer measures against harassment that, in the more severe cases, provide very strong penalties for persons found guilty of harassment and illegal eviction. However, the effects of possible illegal actions are not considered under CEQR.

Comment 3-20: The Lead Agency should consider anti-harassment measures to help protect those in rent stabilized units and if significant impacts are shown, direct HPD to help mitigate those impacts by developing a Housing Plan, like those written for East New York and East Harlem, that targets buildings and tenants in the area for increased availability of funding for both new and existing regulated buildings in the area. (CB3_Rogers_005)

Response 3-20: Comment noted. Mitigation strategies will be developed in the event that the Socioeconomic analysis in the EIS determines that the projects would have the potential to result in significant adverse impacts due to indirect residential displacement. Please also see the response to Comment 3-19.

Comment 3-21: The development would introduce such a significant new population—75 percent of which would be market-rate tenants—that it would be nearly impossible to not result in an abrupt change in the socioeconomic conditions and character of the neighborhood. We are certain it would lead to substantial indirect displacement of low-income area residents. This is particularly alarming since the median income of the immediate and adjacent census tracts ranges from \$18,944 to \$29,418. (MAS_Negret_016, TBTRA_055)

Response 3-21: Comment noted. As detailed in the Draft of Scope of Work, the Socioeconomic Conditions chapter of the EIS will assess how the proposed projects might affect the socioeconomic conditions and character of the neighborhood, and whether such changes would be considered significant and adverse.

Comment 3-22: To properly do this analysis, it will be critical to determine the number of units that are market-rate rentals and the rent-stabilized units by building. These data are available from HCR, HPD, and/or NYC Dept. of Finance. The DEIS should use these sources (not the Census Bureau) to obtain data. (CB3_Rogers_005)

The DEIS should examine the potential to displace vulnerable populations regardless of the regulated status of their unit. This analysis should include data that correlate with actual displacement. These sources should include eviction and foreclosure data for the past five years, building and alteration permits, demolition permits, complaints of landlord harassment, an inventory of currently regulated building stock that will soon expire, all subsidized, rent-regulated and or stabilized apartments, an inventory of local requests for Right to Counsel, and interviews with local housing groups that counsel tenants who have been subject to harassment, discrimination, and displacement. (CAA AV_Dang_033, CB3_Rogers_005, CB3_Rogers_044, LEOTA_009, LESPP_013, LESPP_Jones_047, Shelton_051, TBTF_052, TBTRA_055, TBT TA_Holland_035, TBT TA_Holland_050, TBT TA_Mak_012, Yo_043)

Response 3-22: The Socioeconomic Conditions chapter of the EIS will apply *CEQR Technical Manual* methodology and its guidelines on appropriate data for assessment of potential indirect residential displacement resulting from the proposed projects' introduction of market rate and affordable dwelling units. This will include estimates of the number of rent-regulated units in the study area, and identification of specific buildings with rent-regulated units.

As described in the *CEQR Technical Manual*, an indirect residential displacement analysis is conducted to determine the potential impacts experienced by renters living in privately held units unprotected by rent control, rent stabilization, or other government regulations restricting rents. Please also see the response to Comment 3-19.

Comment 3-23: Regarding indirect residential displacement, the proposed buildings are in close proximity to Chinatown, and residents are deeply concerned over the increased pressure it will surely bring this working-class, immigrant neighborhood. Look beyond income to race, education, and language capacity to more accurately identify vulnerable populations. (CAA AV_Wang_031, CAA AV_Wang_046, TBTF_052, Zheng_032)

Response 3-23: As noted in response to Comment 3-22, an indirect residential displacement analysis is conducted to determine the potential impacts that may be experienced by the population vulnerable to increasing rents, i.e., renters living in privately held units unprotected by rent control, rent

stabilization, or other government regulations restricting rents. Data regarding race, ethnicity, and language capacity are not part of environmental assessments under CEQR.

Comment 3-24: The indirect residential displacement analysis should include: current race/ethnicity composition of the neighborhood, and trends in demographic change, if any; current foreign born population, and trends in foreign born population change, if any; current rates and trends of rent burden; current rates and trends for overcrowding; tenant harassment methods, rates, and trends; recent eviction rates and trends; soft site analysis of potential development sites, including those with significantly underutilized FAR; a robust real estate market study, including: trends in new residential and commercial development; property value change; median rent change; qualitative interviews with real estate brokers and tenants; organizers about development patterns, rental market trends, and indirect residential displacement pressures in the Two Bridges neighborhood. (Shelton_051)

Response 3-24: The Socioeconomic Conditions chapter of the EIS will apply *CEQR Technical Manual* methodology, and its guidelines on appropriate data, for the indirect residential displacement analysis. This will include assessment of changes in demographics, rent burden, and may include interviews with real estate brokers and other entities familiar with local market conditions. It will not, however, include consideration of race and ethnicity or foreign-born population change, as these factors are not the subject of CEQR assessment. With respect to consideration of tenant harassment, please see the response to Comment 3-19.

Comment 3-25: Mitigations should include discussions with the community members about businesses they are lacking, including commercial banks, dry cleaners, tailors, and retail outlets for fresh produce. (TBTF_052)

Mitigations: The provision of low-cost housing in proportion to local needs. The DEIS needs to study not only income groups, but housing availability at each income level, and study the provision of low-cost housing on site or within the district that increases the proportion of local housing affordable to local residents. (TBTRA_055)

Response 3-25: Mitigation measures, if determined to be necessary, will be developed in coordination with the lead agency and other agencies, as appropriate. The EIS will disclose a range of mitigation measures for any significant adverse impacts identified in the EIS. Please also see the response to Comment G-12, below.

INDIRECT BUSINESS DISPLACEMENT

Comment 3-26: The recent loss of the neighborhood's Pathmark supermarket was a heavy blow to the Two Bridges community. This supermarket offered affordable grocery options to the surrounding community, and many of our constituents relied on it for their daily shopping needs. We strongly urge the City to consider the need for affordable food shopping options in the area. We are also concerned about small business displacement, potentially caused by these towers. The EIS should consider the neighborhood's reliance on small businesses, and the City must propose solutions to prevent any further displacement of the shops that serve the community and drive the neighborhood's economy. (Pang_023, Squadron_006)

Response 3-26: Comment noted. The Socioeconomic Conditions chapter of the EIS will include an assessment of indirect business displacement. That assessment will consider effects on neighborhood-serving commercial uses.

Comment 3-27: Examine impact on needed food resources. Community members at the pre-EIS meetings expressed concern about the dearth of local retail facilities for affordable food, and the participants are very concerned about the neighborhood need for a large, affordable, and healthy grocery store. Since the loss of the Pathmark grocery store, residents have had to rely on Fine Fair and C-Town. C-Town in particular, which offers a wider variety of fresh food, is distant, closer to the Brooklyn Bridge. One of the buildings in the current EIS area threatens the oldest remaining local deli (Stop 1 Deli, is located in 265 Cherry Street, reportedly serving the community for more than 30 years). (TBTRA_055)

Response 3-27: A direct and indirect business displacement assessment will be included in the Socioeconomic Conditions chapter of the EIS, consistent with the guidelines described in the 2014 *CEQR Technical Manual*.

Comment 3-28: Examine how far residents would need to travel to purchase needed goods at prices comparable to what are currently available in the local area, as well as means of transport to reach these stores, and the level of difficulty for people who have problems with mobility in accessing these stores. In particular, consider the impact on availability of stores that carry culturally specific produce and products that may be subject to indirect business displacement. (TBTRA_055)

Response 3-28: The business displacement assessments in the EIS will consider the availability and affordability of consumer goods, and the potential effects of the proposed projects on the prices of such goods.

Comment 3-29: Examine specific likely impacts on local bakeries and food processing – i.e., noodle factories, which provide local employment and serve a local market. Examine the potential for the new development to increase the number of bars and restaurants targeting tourists and other seeking nightlife, especially in light of the proliferation of these establishments and their negative impacts on the residents of the Lower East Side. (TBTRA_055)

Response 3-29: The indirect business displacement assessment will consider the manner in which consumer demands from the projects’ populations alter commercial market conditions, and whether there are specific types of neighborhood businesses that are vulnerable to displacement from increased rents, and if so, whether those businesses provide essential services to study area residents or businesses.

Comment 3-30: For Indirect Business Displacement, the Scope of Work focuses on businesses that are “essential to the local economy.” Residents of this area are often linguistically isolated and there are many local businesses that specifically service the needs of these linguistically isolated populations. Businesses that provide goods and services to non-English language speakers are “essential to the local economy.” Consequently, when determining which businesses are “essential to the local economy,” the DEIS should study not only the size of the business, but the populations that they serve and the choices those populations have if these businesses were to be displaced. (Aroyon_039, CB3_Rogers_005, CB3_Rogers_044)

Response 3-30: Comment noted. The Socioeconomic Conditions chapter of the EIS will apply *CEQR Technical Manual* methodology in determining the proposed projects’ effects on neighborhood-serving commercial uses. Language capacity is not a determining factor under CEQR.

Comment 3-31: In addition to public data sets, examine the economic development section of the Chinatown Working Group Plan, as well as the Asian-American Legal Defense and Education Fund study, which identifies the loss of culturally unique businesses and services that are essential to the residents and the local economy. Use the data from the indirect residential displacement to determine the numbers of people who shop in small local businesses in the larger study area, to project impact on local business. Examine potential impacts, such as increases in rent, on existing businesses that serve the local market and provide needed services: -- Madison Street: moderately priced retail food outlets, personal services - -Jefferson Street: grocers carrying affordable frozen vegetables and fresh meat and poultry --Rutgers Street: barber shop These businesses are important to existing residents but are not likely to be patronized by new,

Appendix B: Response to Comments on the Draft Scope of Work

more affluent residents. They are also likely to be indirectly displaced through increases in rents. (TBTRA_055)

Response 3-31: The indirect business displacement assessment will follow the Final Scope of Work, *CEQR Technical Manual* methodology, and guidance from the lead agency. The studies referenced by the commenter will be considered. The analysis will factor for predicted changes in the residential demographics/consumer base to better understand potential effects on neighborhood businesses and price points.

Comment 3-32: The economic development section of the Chinatown Working Group Plan, as well as the Asian American Legal Defense and Education Fund study both contain essential information, which should be used by the Lead Agency when evaluating indirect business displacement. Further, data from indirect residential displacement should be used to determine how shifts in shopping patterns due to neighborhood income change would impact local businesses. (CB3_Rogers_005, TBTRA_055)

Response 3-32: The Socioeconomic Conditions assessment may rely on the above-referenced documents, as well as other local area reporting, and may include reference if it advances the assessment methodology prescribed by the *CEQR Technical Manual*. The indirect business displacement assessment will consider whether the proposed projects could change the demographic composition of the study area's consumer base, and if so, its potential effects on area businesses.

Comment 3-33: The EIS needs to draw relationships—draw connections between the relationships of residential displacement as well as business displacement because local businesses that provide essential goods to residents will also contribute to neighborhood affordability. (GOLES_Ngok_034, TBTF_052, TBTRA_055)

Response 3-33: Comment noted. The Socioeconomic Conditions assessment will consider the above-described interconnections in its assessment.

Comment 3-34: Mitigations should include both tax incentives for property owners who rent to local businesses as well as limitation on certain uses - including limitations on size. (CB3_Rogers_005)

Mitigations: New retail is part of the development plan: consider the market and price points to be served by these new facilities and ensure that they will meet local needs. Examine ways to incentivize retention and attraction of locally serving retail that is affordable to current residents of the neighborhood. Mitigations should include both tax incentives for property owners who rent to local businesses as well as limitations on certain uses - including but not limited to size. Mitigations

should also include discussions with the community about businesses they are lacking, which have included: commercial banks, dry cleaner/tailor, shoe repair, family-style restaurants, and retail outlets for fresh produce. (TBTRA_055)

Response 3-34: Comment noted. Mitigation measures, if determined to be necessary, would be developed in coordination with the lead agency and would be identified within the EIS for review and comment by the public.

Comment 3-35: Consider that indirect business displacement will result in loss of services and jobs and create further displacement. (Brewer_045, CAAAV_Wang_031, CAAAV_Wang_046, GOLES_Pinada_041)

Response 3-35: The Socioeconomic Conditions chapter of the EIS will include an assessment of potential indirect business displacement. If that assessment identifies the potential for business displacement, the analysis will consider the services offered by vulnerable businesses, and whether the loss of those services and employment associated with the businesses could lead to conditions that significantly affect neighborhood character.

STUDY AREA

Comment 3-36: The study area for secondary displacement needs to be extended a ½-mile radius and mapped out to include adjacent Manhattan neighborhoods of Chinatown and Lower East Side, up to Delancey Street and any sections that are predominantly Latino and Asian. (CAAAV_Wang_046, CB3_Rogers_044, Kaplan_048, LEOTA_009, LEOTA_Gonzalez_079, LEOTA_Richardson_081, TBTF_052, TBTRA_055, TBTTA_Mak_012, Yuen_001)

Looking at a ¼-mile radius and only looking at unregulated apartments is a basic flaw in the way that the CEQR document describes the process. (Kaplan_030, Kaplan_048)

Because of the size of this project and the number of market-rate units, the study area should at least match the study area described in the Land Use, Zoning, and Public Policy section. (CB3_Rogers_005)

The study area for secondary residential displacement, like the study area for land use, should be increased to a half-mile and drawn to include adjacent Manhattan neighborhoods of Chinatown and the Lower East Side, up to Delancey Street and including census tracts that are predominantly Latino and Asian. (TBTRA_055)

Response 3-36: A study area typically encompasses a project area and adjacent areas within approximately 400 feet, ¼-mile, or ½-mile, depending upon the project size and area characteristics. According to *the CEQR Technical Manual*, the larger ½-mile study area is appropriate for projects that

would potentially increase the ¼-mile area population by more than five percent. Under the Reasonable Worst Case Development Scenario, the proposed projects would increase the ¼-mile area by greater than five percent, and therefore a ½-mile study area is appropriate. Note that because socioeconomic analyses depend on demographic data, it is necessary to adjust the study area boundary to conform to the census tract delineation that most closely approximates the desired radius. For this analysis, the census tracts that comprise the “socioeconomic study area” are expected to be generally bounded by the East River to the south, the Brooklyn Bridge to the west, Bowery to the north, and Delancey Street and the Williamsburg Bridge to the east.

COMMUNITY FACILITIES

Comment 4-1: There are no full service hospitals in Manhattan Community District 3. The capacity of health and senior care facilities in the area should be examined to assess whether they will be able to absorb the additional population. A detailed assessment of health care facilities should be provided in the EIS. The community has hospital needs, which have not been addressed. (Benitez_068, Brewer_004, Brewer_045, LESPP_013, LESPP_Jones_047, LETTA_Castro-Negron_073, TBTRA_055, TBTTA_Mak_012)

The DEIS should study the capacity of the health care system and project how much further these new residents will increase that utilization rate. The DEIS should propose methods whereby the City and the applicants will mitigate the impacts of the lack of service in this area. (CB3_Rogers_005, CB3_Rogers_044)

Response 4-1: As explained in the Draft Scope of Work, a detailed assessment of health care facilities is included only if a proposed project would directly affect the physical operations of, or access to and from, a hospital or public health clinic, or if a proposed action would create a sizeable new neighborhood where none existed before. The proposed projects would be located within the existing Two Bridges neighborhood of the Lower East Side, which is an established residential neighborhood currently served by health care services.

Comment 4-2: The proposed 2,775 residential units should be considered a sizeable new neighborhood, requiring an assessment of police and fire services. (C Boyle_018, B3_Rogers_005, CB3_Rogers_044, Faucette_003, Hawkins_002, Kazi_067, Klempay_017, LEOTA_Richardson_081, Marte_027, Moskowitz_014, Moskowitz_065, Newton_015, TBTF_052, Wolf_019)

Response 4-2: The proposed projects would be located within the existing Two Bridges neighborhood of the Lower East Side; they would not create a sizeable new neighborhood where none existed before, like Hunter’s Point South. Please see response to Comment 4-1.

Comment 4-3: The environmental analysis should include a study of the effects on schools, publicly funded child care, and libraries. (Benitez_068, LEOTA_Richardson_081, LETTA_Castro-Negron_073)

It is expected that the new population would overburden area public schools, libraries, child-care facilities, and other publicly funded services. (MAS_Negret_016)

Response 4-3: As detailed in the Draft Scope of Work, a detailed analysis of public schools, public libraries, and publicly funded child care facilities will be analyzed in the EIS.

Comment 4-4: I worry that if the buildings are built, essential neighborhood staples like childcare, support for immigrants, support for seniors, low-cost restaurants, those programs that help non-English speaking families, could lose their place in the community because the rent and the real estate rent will soar. (Brewer_045)

Response 4-4: The 2014 *CEQR Technical Manual* defines community facilities as public or publicly funded schools, child care centers, libraries, health care facilities, and fire and police protection services. The Community Facilities analysis in the EIS will follow *CEQR Technical Manual* methodology.

Comment 4-5: The EIS should include an examination of available social services and space for senior activities and services. This assessment should include the indirect displacement of small pharmacies and other health services, the impact of retail and community facilities due to rising rents, on alternative medical facilities, within at least a ½ mile, the indirect displacement of culture-based supermarkets and grocery stores, and the capacity of public transit to serve seniors. (TBTF_052, TBTRA_055)

Response 4-5: The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. The *CEQR Technical Manual* defines community facilities as public or publicly funded schools, child care centers, libraries, health care facilities, and fire and police protection services.

FIRE AND POLICE

Comment 4-6: Community services such as the police, mail service and post office are already overtaxed. Civil services such as police, fire, postal, EMT and

sanitation must be scrupulously reviewed. (TBTF_052, TBTRA_055, TBTTA_Mak_012)

Response 4-6: The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. The *CEQR Technical Manual* defines community facilities as public or publicly funded schools, child care centers, libraries, health care facilities, and fire and police protection services. The proposed projects would not result in direct effects on health care facilities or police and fire services, nor would they create a sizeable new neighborhood where none existed before, like Hunter's Point South; therefore, a detailed analysis of indirect effects on health care facilities and police and fire services is not warranted. It is the policy of the New York Police Department (NYPD) and the Fire Department of the City of New York (FDNY) to evaluate the need for personnel and equipment and make adjustments to adequately serve the area as needed.

SCHOOLS

Comment 4-7: The City must study the cumulative impact of all of the residential development, including at the Extell site, the Two Bridges LSRD, and LaGuardia Houses, on our already crowded schools. (Imperiale_075, Kramer_024, Pang_023, Squadron_006, TBTF_052)

Response 4-7: The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. The analysis will assess existing population data and incorporate SCA's enrollment projections and SCA's New Housing Starts data for the future without the proposed projects. Students associated with One Manhattan Square will be added to SCA's projected New Housing Starts data because this residential project was not included in SCA's projections.

Comment 4-8: The data from the *CEQR Technical Manual* for student generation is both out-of-date and imprecise. It is based upon queries of the 2000 Census PUMS file and is for all of Manhattan, rather than localized areas. The student generation tables need to be updated. Simply, the New York City of 2000 does not exist anymore. The analysis should be done using generation tables developed from the most current American Community Survey PUMS file, and the query should be more geographically targeted to CD3, rather than just assuming all of Manhattan functions the same when it comes to child generation. If these changes are not made, the DEIS will likely understate the impact on local schools, especially elementary schools. (CB3_Rogers_005, CB3_Rogers_044)

Response 4-8: The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. Student generation will be based on the multipliers set forth in the *CEQR Technical Manual*.

- Comment 4-9:** The project is at the edge of School District 1, which is an un-zoned district. When evaluating capacity for elementary schools, the analysis should look only at elementary schools that are close to the proposed project and not all schools in the district. The analysis of capacity should examine the two closest elementary schools (PS 134 and 110). (CB3_Rogers_005)
- Response 4-9:** The methodology for the public school analysis will be determined in coordination with DCP and SCA, taking into account unique factors in Community School District 1. In particular, since the proposed projects are located within a school district that has elementary and middle school choice programs, and given the small geographic size of the district, the public school analysis will consider both CSD 1 and the sub-district in which the proposed projects are located.
- Comment 4-10:** The three new developments (including Extell, NYCHA NextGen) will bring an increase of residents or families with kids that increase the enrollment rate and waiting list. P.S. 184 already has inadequate space. After school programs should be assessed, and additional programming should be offered. The need to increase school seats should be examined, not just by increases that attain the five percent threshold point, but also on local schools being near or at 100 percent capacity should be focused on. (TBTF_052, TBTRA_055, TBTTA_Mak_012)
- Response 4-10:** See response to Comment 4-7. In addition, pursuant to CEQR methodologies, after school programs are not assessed.
- Comment 4-11:** Analysis of elementary and intermediate schools in the “sub-district” should include student performance level data, enrollment, waiting list and capacity. If schools in the “sub-district” are deemed to be at or near capacity, then a closer examination of the schools in the entire district needs to be probed. (TBTRA_055, TBTTA_Mak_012)
- Response 4-11:** See response to Comment 4-9. The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. Per *CEQR Technical Manual* methodology, enrollment, capacity, and utilization will be analyzed in the EIS.
- Comment 4-12:** Since there are several new development projects under construction or proposed in the vicinity such as Extell, Essex Crossing, LaGuardia Houses (NextGen); these projects will stimulate an increase demand for the school seats and needs to be accounted for in the analysis. Determine whether there are any schools in the Two Bridges area that are under construction or in the planning stage. If none, then community residents suggest that developers should commit to provide a new school as mitigation. (Kramer_024, TBTF_052, TBTRA_055, TBTTA_Mak_012)

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- Response 4-12:** See response to Comment 4-9. Following 2014 *CEQR Technical Manual* methodology, potential impacts on public schools will be analyzed in the EIS and anticipated changes to school capacity will be incorporated into the analysis.
- Comment 4-13:** The Lower East Side Power Partnership advocates that the sub-district, that includes PS 110, PS 134 and PS 184, be analyzed. LESPP advocates that various mitigation strategies be analyzed for the EIS. (LESPP_013)
- Response 4-13:** Existing schools within both CSD1 and the sub-district will be analyzed. Mitigation measures will be identified for any identified significant adverse impacts.
- Comment 4-14:** The DEIS needs to analyze: local school enrollment trends; accessibility for individuals with disabilities; the ability of present facilities to accommodate growing class sizes; inadequacies of facilities: such as auditoriums, cafeterias, libraries, gymnasiums; co-located spaces and future charter co-locations; insufficient space to serve English as a Second Language (ESL) Learners; child care needs; funding opportunities to support demonstrated needs and to promote education equity. (TBTF_052)
- Response 4-14:** The Community Facilities analysis in the EIS will follow 2014 *CEQR Technical Manual* methodology and will consider potential impacts to public schools. Per *CEQR Technical Manual* guidance, the EIS will consider school enrollment trends using SCA projections. The public school analysis will consider both CSD 1 and the sub-district in which the proposed projects are located.

PUBLICLY FUNDED CHILD CARE

- Comment 4-15:** Publicly funded child care should be assessed. The *CEQR Technical Manual* has not been updated since Universal Pre-K has been instituted in New York City, and the DEIS needs to evaluate the care and education needs of children in Pre-K at public schools and in community based organization, and in publicly funding child care (ACS, Head-Start). Capacity analysis of child care funded by ACS and Head-Start should also consider waiting lists for these facilities. If capacity for publicly funded child care is too low for the needs of the new project, a new on-site facility may be required to mitigate the impact. (CB3_Rogers_005, CB3_Rogers_044, TBTF_052, TBTRA_055)
- Response 4-15:** The Community Facilities analysis will follow 2014 *CEQR Technical Manual* methodology. The analysis of potential impacts on publicly funded child care facilities will be based on enrollment, capacity, and utilization data from the New York City Administration for Children's Services.

Comment 4-16: The current wait list should be included in child care analysis and if there are any new facilities under construction or planning stages. A new child care facility may be needed depending on location and the number of new slots anticipated as a result of these projects. Affordability of new childcare resources needs to be weighted carefully as it impacts the availability of this required resource for low income residents (especially for local Section 8 residents and NYCHA residents). (TBTF_052, TBTRA_055, TBTTA_Mak_012)

Response 4-16: See response to Comment 4-15.

LIBRARIES

Comment 4-17: Library utilization is much less about items circulating, and much more about services that are obtained by residents in the branches. When examining the capacity of the local libraries in the catchment area, the DEIS should examine how many people local branch libraries can hold, and how many people are actually there during the most popular hours and compare this number to the number of people in the catchment area to determine a capacity and utilization rate for the library services. Using these rates, the capacity and utilization of each branch library can be calculated and the impact of the project on the capacity can be estimated. (CB3_Rogers_005, TBTRA_055)

Response 4-17: The Community Facilities analysis in the EIS will follow 2014 *CEQR Technical Manual* methodology. Potential impacts on public libraries will be analyzed in the EIS. Per *CEQR Technical Manual* methodology, an analysis of libraries compares the population generated by a proposed project with the catchment area population of libraries available within an approximately ¼-mile area around a project site.

Comment 4-18: Seward Park Library is the closest neighborhood library in this area. Examine whether the facility is adequate to handle increased population from these newly proposed housing projects. There is already overcrowding which people need to wait to use the computers, check-in/check-out materials, and there is limited space for seating and tables. Community residents suggest a need for an additional library. (TBTRA_055, TBTTA_Mak_012)

Response 4-18: See response to Comment 4-17.

EMERGENCY RESPONSE

Comment 4-19: The EIS needs to study how a significant increase in residents will affect evacuation measures (shelter capacities, first responder capacities). (TBTF_052)

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How is this building going to affect us under any kind of natural disaster or snow? (Hung_084)

Response 4-19: The proposed projects would not directly affect the physical operations of, or access to and from, a fire station house or precinct house, nor would they introduce a new neighborhood. Therefore, and as discussed in the Draft Scope of Work, the proposed projects are not expected to trigger detailed analyses of police and fire protection serving the project area.

OPEN SPACE

Comment 5-1: The EIS should include a study of the project's effects on open space. (Benitez_068)

Response 5-1: Potential impacts on open spaces will be analyzed in the EIS.

Comment 5-2: We object to the malicious intent to alter the use of "open" space. (Ramirez_056)

Response 5-2: See response to Comment 5-1.

Comment 5-3: According to the *CEQR Technical Manual*, Open Space may be either publicly accessible, or private, but that only publicly accessible space is used in the quantitative analysis while private open space is a qualitative measure. The Open Space analysis should focus solely on publicly accessible open spaces. Private open spaces are not a mitigating factor that addresses the lack of public open spaces in this community. While these private spaces are often used informally by the public because of the lack of public open spaces, continued access is not assured even from day-to-day. (CB3_Rogers_005, CB3_Rogers_044, TBTRA_055)

The proposed projects should consider providing additional publically accessible open spaces on the sites, with both active and passive uses. (TBTRA_055)

Response 5-3: The open space analysis in the EIS will follow 2014 *CEQR Technical Manual* methodology. Per *CEQR Technical Manual* methodology, open space is defined as publicly accessible, publicly or privately owned land that is available for leisure, play, or sport or serves to protect or enhance the natural environment. All publicly accessible open space resources in the study area will be analyzed in the quantitative open space assessment, and potential impacts on open spaces will be analyzed in the EIS. Private open spaces that are not publicly accessible are considered only qualitatively and do not factor into the quantitative open space assessment under *CEQR Technical Manual* methodology.

Comment 5-4: If the proposed project demonstrates impacts on public open spaces, the lead agency should consider making all or some of the private open space

proposed in the projects open and accessible to the public. These spaces should also be subject to minimum standards for amenities offered, much as is done with plazas and other privately owned, publicly accessible open spaces. (CB3_Rogers_005)

Response 5-4: The open space analysis in the EIS will follow 2014 *CEQR Technical Manual* methodology. Potential impacts on open spaces will be analyzed in the EIS. If the analysis finds the potential for significant adverse impacts on open space resources, mitigation measures will be advanced to address these impacts.

Comment 5-5: We are concerned about the demand new residents, including senior residents, would place on limited existing open space in the area. (MAS_Negret_016)

Response 5-5: See response to Comment 5-1.

Comment 5-6: Safe open space and access to the waterfront needs to be provided. (NYCC_Chin_059, NYCC_Chin_060)

Response 5-6: Comment noted. See response to Comment 5-4.

Comment 5-7: It is likely that should the proposed development go forward, this open space [on Site 4 (4A/4B), Lot 76] will significantly decrease in quality due to the 1,000 foot tower being built directly over Lot 76. The claim that any open space will be improved is also suspect given that the LSRD Zoning Calculations chart states that the existing amount of open space within the boundaries of the large scale plan is 275,121 square feet and the proposed amount of open space is 169,043 square feet - a loss of over 100,000 square feet of open space. The impacts of the loss of this space must be studied and understood. (LittleCherry_020, LittleCherry_Spindler_062)

Response 5-7: This comment is referring to the open space calculation used for zoning purposes, which includes any unbuilt areas on the lot (e.g., parking lots and areas enclosed by fences). In contrast, open space for purposes of environmental review refers to the areas that are open and accessible for use by the public. The proposed projects would include approximately 22,779 square feet (sf) of new open space—including both private and publicly accessible open space—in addition to the the enhancement of approximately 80,020 sf of existing open space on the project sites. The existing private Rutgers Slip Open Space would be enlarged and enhanced. It would be dedicated as publicly accessible open space, totaling approximately 33,550 sf (approximately 0.77 acres), comprising both enhanced existing open space and new open space.

Comment 5-8: There are currently benches that are scattered on the islands on Pike Street; exercise stations under the FDR Drive, and the skate park under the Manhattan Bridge. With the increase in population, what other public recreational facilities will be overhauled or developed to accommodate the masses? (Pang_023)

Response 5-8: Comment noted. All publicly accessible open space resources in the study area will be inventoried and analyzed in the quantitative open space assessment, and potential impacts on open spaces will be analyzed in the EIS. As described above, the proposed projects would include approximately 22,779 sf of new open space—including both private and publicly accessible open space—in addition to the enhancement of approximately 80,020 sf of existing open space on the project sites. The existing private Rutgers Slip Open Space would be enlarged and enhanced, and dedicated as publicly accessible open space. If the Open Space analysis identifies a significant adverse impact related to open space, mitigation measures to address that impact will be explored by the applicants in consultation with DCP and NYC Parks.

Comment 5-9: Examine the impact of new residents on Cherry Clinton Playground, the only public open space in the LSRD. (TBTRA_055)

Response 5-9: See response to Comment 5-1.

SHADOWS

Comment 6-1: Shadows must be addressed with extreme diligence. The impact on this category cannot be overstated. (LittleCherry_020)

Response 6-1: A detailed shadow study will be conducted for the EIS, following the guidelines in the *CEQR Technical Manual*. The study area will be comprehensively surveyed for publicly accessible sunlight-sensitive features and resources, and the extent and duration of incremental project-generated shadows will be quantified in a table and illustrated in diagrams. The potential effects of the incremental shadows will be assessed for each resource.

Comment 6-2: The EIS should assess the project's effects on shadows, including on affected public housing and its occupants. Adverse effects to light and air at adjacent properties should be analyzed. (Benitez_010, Benitez_068)

The projects will cast shadows on public housing, which were built so that every window will have sunlight. That makes public housing a sunlight sensitive resource. (Cancel_085, LESON_007, LESON_054, LESON_Koetz_064, LESON_Nieves_074, LESON_Shen_077)

All of the proposed buildings either go on top of, cantilever over, or go directly next to existing buildings, many of them eliminating windows, light, air and space. (TBTTA_Holland_035, TBTTA_Holland_050)

Response 6-2: The shadow analysis in the EIS will include all publicly accessible open spaces, sunlight-dependent features of historic architectural resources, and sunlight-dependent natural resources, per the guidelines of the *CEQR Technical Manual*. Using this methodology, buildings or structures other than those defined as historic resources containing sunlight-sensitive features, such as open galleries, arcades, highly carved ornamentation, stained-glass windows, multi-colored Art Deco facades, etc., are not included in the shadows assessment.

Comment 6-3: The water should be classified as a shadow sensitive resource and impacts on the submerged aquatic vegetation and the benthic community should be assessed. Shadows on historic and cultural resources should also be considered. (CB3_Rogers_005, CB3_Rogers_044)

Response 6-3: The shadow analysis in the EIS will include an assessment of project-generated shadows on the East River and its habitat. The shadows analysis will also assess sunlight-dependent architectural features of historic resources within the shadows analysis study area. The extent and duration of incremental shadow, if any, will be quantified and illustrated.

Comment 6-4: Open spaces that are frequently used by the public should be classified as shadow sensitive resources regardless of whether they are privately or publicly owned, and the impacts on these spaces should be assessed and, if necessary, mitigated. (CB3_Rogers_005)

Response 6-4: The shadow analysis in the EIS will conduct a thorough survey of the study and inventory all publicly accessible open spaces, including parks, playgrounds, plazas, schoolyards (if open to the public during non-school hours), greenways, and landscaped medians with seating. Under *CEQR Technical Manual* methodology, private open spaces are not included in a shadows analysis.

Comment 6-5: The three towers will likely cast significant shadows on nearby parks, namely Seward Park, Little Flower Playground, and Cherry Clinton Playground, and the East River. (MAS_Negret_016, TBTRA_055)

The development of three massive towers along the East River waterfront will cast such a tremendous shadow on the site itself and the surrounding area. With no buildings taller than the proposed developments between the site and the East River, it is guaranteed that the site and its neighbors will be cast in shadow nearly the entire first half of the day. (LittleCherry_020)

Compared to the six story buildings, the projects will cast shadows. (Riddle_029)

The proposed Starrett building would block the only direct sunlight the residents of the TBTHC currently receive. The L&M/CIM building will likely significantly decrease the indirect sunlight currently obtained through the Jefferson and South Street corner. Our residents will be living in shadows. (TBTHC_053)

The shadows assessment should consider the cumulative effects of the tall towers in the study area, including Extell and the proposed towers, on public open spaces including Coleman Playground/Baseball Field/Skate Park, 265 and 275 private/open Playground space, Cherry/Clinton Playground, NYCHA Rutgers and La Guardia Playground, Little Flower Playground, P.S 184 schoolyard, Pier 35 and Pier 36 landscape and waterfront, Greenways on Pike St, Rutgers St, Montgomery St. and our Plaza walkway by 227 Cherry Street, architectural resources including the Manhattan Bridge and the bridge's architectural archway on Cherry and Pike St, and natural resources including surface water bodies, wetland resources, sensitive or designated resources like coastal fish and wildlife habitats. (TBTRA_055, TBTTA_Mak_012)

Response 6-5: The EIS will include a comprehensive shadow study that follows the guidelines of the *CEQR Technical Manual*. The study will model and quantify the extent and duration of the project-generated shadows that fall on sunlight-sensitive resources in the neighborhood. Sunlight-sensitive resources include publicly accessible playgrounds, parks, plazas and other open spaces, sunlight-dependent architectural features of historic resources, and sunlight-dependent natural features such as the East River. The shadow study will assess the quantitative and qualitative data and derive conclusions regarding the nature of the shadow impacts using *CEQR Technical Manual* guidelines. The Extell building is not part of the proposed projects, but will be included in the background conditions when comparing shadows in the future with the proposed projects to shadows in the future without the proposed projects.

Comment 6-6: The shadows assessment must be consistent with the findings under ZR Section 78-313, and found in compliance with all applicable subsections including (b), (c), (d), and (g). (LESON_007, LESON_054)

Response 6-6: The shadows assessment will follow the guidelines of the *CEQR Technical Manual*.

HISTORIC RESOURCES

Comment 7-1: The EIS should include a study of the effects on historic resources. (Benitez_068)

- Response 7-1:** The Historic and Cultural Resources chapter of the EIS will analyze the proposed projects' potential to affect historic and cultural resources.
- Comment 7-2:** The study area for historic and cultural resources needs to be larger considering the size of the proposed buildings. An historic resource that experiences a shadow impact is close enough to be in the study area for Historic and Cultural Resources. (CB3_Rogers_005)
- The study area boundary should be expanded to a ½ mile. (TBTRA_055)
- Response 7-2:** The study area for Historic and Cultural Resources is consistent with the methodology established in the *CEQR Technical Manual*. The shadows analysis of the EIS will consider the potential for the proposed projects to cast new, or incremental, shadows on sunlight-sensitive architectural features of historic resources within the shadows analysis study area.
- Comment 7-3:** The New York City Landmarks Preservation Commission (LPC) has determined that there is potential for the recovery of remains from Colonial and 19th Century occupation on the project sites. (MAS_Negret_016)
- Response 7-3:** As requested by LPC, a Phase 1A Archaeological Documentary Study of the three project sites will be prepared to determine their archaeological sensitivity. The findings from the Phase 1A will be summarized in Chapter 7, "Historic and Cultural Resources" of the EIS.
- Comment 7-4:** The analysis should take into account places of cultural value to the community. The Chinatown Working Group plan identifies cultural and historic resources and potential places of significance and should be used as a reference. (TBTRA_055)
- Response 7-4:** The Historic and Cultural Resources analysis will identify both known and potential resources in consideration of both their architectural and cultural significance. As defined in the *CEQR Technical Manual*, known resources include buildings, structures, objects, sites, and districts that are National Historic Landmarks (NHLs); have been listed on or determined eligible for listing on the State/National Registers of Historic Places (S/NR); are New York City Landmarks (NYCLs) and/or are New York City Historic Districts (NYCHDs); and properties that have been found by LPC to appear eligible for designation, considered for designation ("heard") by LPC at a public hearing, or calendared for consideration at such a hearing for NYCL designation (these are "pending" NYCLs). In addition, a survey of the study area will be undertaken to identify any buildings that could meet S/NR and NYCL eligibility criteria ("potential resources"). The EIS will consider the proposed projects' potential to

affect both architecturally and culturally significant known and potential resources.

URBAN DESIGN AND VISUAL RESOURCES

Comment 8-1: The proposed developments will tower over the existing urban fabric. The DEIS should examine how the new buildings impact the design framework of the area, whether the buildings maintain a solid street wall, create a sense of place, and promote increased pedestrian use of public space. It should assess whether the new uses constructively engage the existing uses, and disclose where view corridors to the water will be obstructed, and where new buildings may obstruct local landmarks that assist residents and visitors in finding their way around. It should assess whether the new buildings promote and enhance streets and public spaces that are well connected, and should be built with sustainable and maintainable materials and color patterns that complement the surrounding buildings. The DEIS should also examine whether the design uses a lighting scheme or locally designed public art and street furniture that add a strong element of the area's historic urban character. It should also examine whether the LSRD provides good signage to aid in orienting residents and visitors. (CB3_Rogers_005, CB3_Rogers_044)

Response 8-1: The Urban Design and Visual Resources analysis will consider the potential effects of the proposed projects on the pedestrian experience in the study area, focusing on the project elements that have the potential to alter the built environment—or urban design character. The urban design character comprises streets, buildings, open space, natural features, view corridors and visual resources, and wind. The analysis also will identify and consider view corridors and potential effects to visual resources in the study area. In addition, views to the project sites from more distant locations, including the Manhattan and Brooklyn Bridges, will also be considered.

Comment 8-2: The three towers, following shortly on the construction of the Extell tower on an adjacent lot, would represent significant changes in the built environment and social composition of the area. The towers, extending over 70 stories, would dwarf the existing buildings in the LSRD and adjacent areas. In analyzing the physical layout the CPC did not contemplate the consequences of huge towers on the remaining sites, placing them in deep shadows, with possible social and public health impacts for existing residents. (Angotti_011)

Response 8-2: As described in the Draft Scope of Work, the EIS will analyze the potential effects of the proposed projects on urban design and visual resources. Furthermore, the potential effects of the proposed projects with

respect to shadows and socioeconomic conditions also will be assessed in the EIS.

Comment 8-3: With proposed building heights ranging from 724 to 1,008 feet, we are concerned about the out-of-scale scope of the project and its potential to block critical view corridors to the East River and access of area residents to light and air. (MAS_Negret_016)

The proposed actions will overwhelm the current density, character, open space, air, light, and multiple infrastructure systems of the LSRD. (LESON_007, LESON_054, LESON_Petition1_008)

Response 8-3: As described in the Draft Scope of Work, the EIS will assess the potential for the proposed projects to result in significant adverse impacts with respect to open space, urban design, community facilities, neighborhood character, and infrastructure.

Comment 8-4: What we're seeing here is buildings that are built at an FAR currently of approximately 4 going to an FAR of 12. They're doubling in height and they're being placed on relatively small lots—several small lots. And I challenge you—I wonder if any of you sitting at this table have walked around that neighborhood—to just envision how 3,000 units, approximately, of housing could ever fit in between the existing buildings on that lot—on those lots. (Kaplan_030)

Response 8-4: The proposed actions would not increase the amount of floor area on the project sites beyond what zoning allows and would comply with all zoning regulations regarding the bulk and height of buildings. Further, the Two Bridges LSRD regulates the maximum developable floor area, lot coverage, and other features of development on the Two Bridges LSRD sites. The new mixed-use developments on the project sites would comply with the underlying district bulk regulations applicable to the sites under the Zoning Resolution. With the exception of the certification to waive certain use requirements on Site 6A, no discretionary waivers—whether pursuant to authorizations or special permits—would be required to facilitate the proposed projects. As described in the Draft Scope of Work, the EIS will assess the potential for the proposed projects to result in significant adverse impacts with respect to urban design and neighborhood character.

Comment 8-5: The draft scope should also address our skyline. This is our skyline. Many of you have already seen from different places on the Manhattan Bridge. (TBTTA_Holland_035, TBTTA_Holland_050)

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I also have great concerns regarding the density, the quality of public space, and the design of the proposed towers. Two of them are too generic to be worthy of the Manhattan skyline. (Kazi_067)

Response 8-5: The potential for urban design impacts will be analyzed in the EIS, consistent with the guidelines presented in the *CEQR Technical Manual*.

Comment 8-6: The proposed projects should access how urban design features are integrated/connected to existing East River waterfront plans. (TBTRA_055)

Response 8-6: The portions of the proposed East River Coastal Resiliency project located within the Urban Design and Visual Resources study area, along with other future development projects that will occur independent of the proposed projects, will be considered in the EIS.

Comment 8-7: Views from the Brooklyn waterfront and also from the neighborhood to the project sites should be analyzed, taking into account how the heights of new buildings contrasts with neighboring structures and existing street layout, both in terms of long views and from the pedestrian experience. (TBTRA_055)

Response 8-7: The Urban Design and Visual Resources analysis will consider view corridors and visual resources in the study area. Views from the Brooklyn waterfront, as well as from the Williamsburg and Manhattan Bridges will be considered.

Comment 8-8: Existing buildings or structures must be in scale with the neighborhood and must not seriously alter normal city amenities. (LESPP_Jones_047, LESPP_Jones_072)

Response 8-8: The existing buildings and structures and how they would relate to the proposed developments will be considered in the EIS in Chapter 8, "Urban Design and Visual Resources," which will be prepared in accordance with the guidelines published in the *CEQR Technical Manual*.

Comment 8-9: The scope must acknowledge that the size of these proposals is off the charts. I am sickened by the prospect of these out-of-scale proposed developments. I cannot fathom the size of these towers, which are huge and out of place in this neighborhood. (NYCC_Chin_059, NYCC_Chin_060)

These massive scale towers and this project are unacceptable. (Reyes_070)

The proposed projects represent a scale and rate of development that is neither contextual within, nor appropriate for, the character of the surrounding area. (Shelton_051)

Response 8-9: The EIS will include an assessment of the potential for the proposed projects to result in significant adverse urban design impacts, which will consider building bulk and scale, and other factors as outlined in the *CEQR Technical Manual*.

Comment 8-10: Parts of the projects will be elevated on podiums, and that will be hard for the pedestrians. (Kazi_067)

Response 8-10: The proposed buildings are being designed to have active ground floor uses within bases that will be built to the sidewalk, creating a consistent streetwall on the project sites.

Comment 8-11: The study of the potential for extreme winds, should be based on the latest climate science and look at increased wind potentials that are outlined by the New York City Panel on Climate Change. (GOLES_Pinada_041)

A detailed analysis of South and Clinton Streets and the potential for creating a wind tunnel should be included. (TBTRA_055)

Response 8-11: A pedestrian wind analysis will be undertaken as part of the EIS. The results of the analysis will be presented in the Urban Design and Visual Resources chapter.

HAZARDOUS MATERIALS

Comment 9-1: The site of 275 South Street was formerly occupied by a gas station. The history of the prior gas station, its demolition and disposal of its hazardous materials including the tanks, are issues that need be reviewed and assessed in order to determine the safety of unearthing soil at this location.(Ramirez_022, Ramirez_056)

Response 9-1: The gas station went out of business and was demolished before the modern framework of environmental regulations was in existence. Therefore such documentation is not readily available and most likely does not exist. However, this is the case for many contaminated or potentially contaminated properties, and the standard procedures for investigating and remediating such properties take into account that there are frequently unknowns and unexpected situations that need to be properly managed both prior to and during construction at such a property. The EIS hazardous materials analysis will detail that this site will be investigated and remediated in accordance with hazardous materials (E) Designation requirements to ensure construction is performed in a manner protective of workers and the community, and that the new construction will include any necessary measures (such as a

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vapor barrier) to address any potential residual site contamination remaining after construction.

Comment 9-2: The EIS needs to fully examine the implications and mitigations required as a result of the Site 5 hazardous materials (E) Designation. (TBTRA_055)

Response 9-2: Remediation of the former fueling facilities and tanks on Site 5 has already been completed to the satisfaction of NYSDEC. All petroleum spills have achieved regulatory closure. Notwithstanding this, it is possible that some residual contamination is present. As such, the hazardous materials (E) Designation on this site will ensure that any OER-required additional investigation and remediation is conducted to ensure construction is performed in a manner protective of workers and the community and that the new construction will include any necessary measures (such as a vapor barrier) to address any known or potential residual site contamination remaining after construction.

WATER AND SEWER INFRASTRUCTURE

Comment 10-1: The EIS should include a study of our sewer systems. (Benitez_068, TBTRA_055)

The analysis should identify existing and proposed stormwater Best Management Practices for the project sites, and the rainfall volume used in the analysis should be disclosed. (TBTRA_055)

Response 10-1: As noted on page 28 of the Draft Scope of Work, because the proposed actions would introduce an incremental increase above the No Action scenario of more than 1,000 residential units and the project sites are located in a combined sewer area within Manhattan, an analysis of water and sewer infrastructure is warranted. The EIS will include an analysis of the proposed projects' potential impacts on the water supply, wastewater and stormwater conveyance and treatment systems and a discussion of Best Management Practices.

Comment 10-2: The developer claims this development will utilize over 1,000,000 gallons of water per day (not including the water required by the 2,200 other units previously mentioned). Our sewer system, when running at capacity, simply dumps waste into our already polluted waterways. In addition, what impact will this development have on our electrical grid and other infrastructure and utilities? (Hawkins_002, Klempay_017, Moskowitz_014, Newton_015, Wolf_019)

Response 10-2: The EIS will include an analysis of the proposed projects' potential impacts on the water supply, wastewater and stormwater conveyance and

treatment. The EIS will also disclose the projects' calculated energy consumption.

Comment 10-3: The current sewage systems can be backed up and clog easily. When this happens, our sewage ends up contaminating our rivers. This contamination can also occur when there's a heavy downpour and flooding in the area, which my area is prone to, due to climate change. Given these current problems in our sewer system, how will it handle the influx of new residents when all these new buildings go up? If new infrastructure improvements and modifications are needed, who will end up paying for all these? (Chow_076)

Response 10-3: The EIS will include an analysis of the proposed projects' potential impacts on water supply and wastewater and stormwater conveyance and treatment. If the assessment reveals the potential for significant adverse impacts, mitigation measures would be disclosed in the EIS. Funding responsibility for any required infrastructure improvements and modifications would be determined in coordination with the lead agency.

Comment 10-4: The Two Bridges EIS must assess the added load from three mega towers to the entirety of the system affected, including the capacity of piping systems to transmit combined sewage and rain water to the Newtown Creek Wastewater Treatment Plant, NCWWTB, without violation of all permit requirements. Interference with flow control, sewer backup mitigation, access and fair usage by other neighborhoods who must assess the piping overflow basin and pumping capacity of the Newtown Creek Drainage Area. (Benitez_010, LESON_Koetz_064, LESON_Nieves_074, LESON_Tieu_036, Riddle_029, TBTRA_055)

The analysis should disclose and document combined sewer outfall impacts from the proposed projects. (TBTRA_055)

The Two Bridges EIS must assess the full impacts to pipe and plant loading, as well as the adverse impacts from ongoing CSO overflow to the East River and other public waters. The Scope of Work must analyze the additive impacts of the project for possible compliance interference with Administrative and Consent Orders to the City of New York as well as continued listing of the Newtown Creek as an Impaired Water under the Federal Clean Water Act and current NYC SPDES permits. (LESON_007, LESON_054)

The City should consider the impact of the development on its water infrastructure, including sewage treatment. Development that will exacerbate this already serious—and unsolved—problem is unacceptable. (Squadron_006)

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- Response 10-4:** The EIS will include an assessment of the potential effects of the proposed projects on wastewater and stormwater conveyance. The NYC Department of Environmental Protection (DEP) will review the water and sewer infrastructure assessment.
- Comment 10-5:** The City is already in violation of the federal EPA as far as the sewage treatment. This until today still has not been resolved. (Cancel_085)
- The new development would also exacerbate the city's chronic stormwater overflow problem and further violate federal statutes and a consent decree. This matter requires a more in-depth and long-term review by the CPC and other city, state and federal agencies, not a minor modification to the LSRD. (Angotti_011)
- Response 10-5:** The EIS will consider the potential impacts of the projects on Natural Resources, as well as Water and Sewer Infrastructure. **[DCP TO ADDRESS VIOLATIONS]**
- Comment 10-6:** What's the mitigation plan? Over a million gallons of wastewater will be produced by the LSRD every day. When running at capacity, we just dump this into our waterways. How will that be mitigated? (Moskowitz_065)
- Response 10-6:** If the infrastructure analysis identifies the potential for significant adverse impacts related to wastewater, mitigation measures for such impacts will be advanced.
- Comment 10-7:** It's very frustrating, and we know it's going to cause a lot of hazard, sewage and everything everybody been talking about before me. And I hope our voice could be heard. (Hung_084)
- Response 10-7:** Comment noted.
- Comment 10-8:** The development would be constructed entirely within the 100-year flood plain, in a combined sewer area, and in close proximity to the East River. (MAS_Negret_016)
- Response 10-8:** The EIS will analyze the potential effects of the proposed projects related to natural resources and water and sewer infrastructure.

SOLID WASTE AND SANITATION SERVICES

- Comment 11-1:** With increased population comes increased garbage. How will sanitation be addressed for these new buildings? Also, garbage collection will also affect traffic flow and road rhythms in these already overcrowded streets. How will this issue be handled? (Pang_023, Rosenberg_083)
- Response 11-1:** Potential impacts on solid waste and sanitation services will be assessed in accordance with the guidelines presented in the 2014 *CEQR Technical*

Manual. As discussed in the Draft Scope of Work, the assessment will describe existing and future New York City solid waste disposal practices; estimate solid waste generation by the proposed projects for existing, No Action, and With Action conditions; and assess the impacts of the proposed projects' solid waste generation on the City's collection needs and disposal capacity. The proposed projects' consistency with the City's Solid Waste Management Plan also will be assessed. With respect to traffic, delivery services, which includes sanitation vehicles, will be accounted for in the trip projections for the proposed projects and analyzed as part of the traffic analysis in the EIS.

Comment 11-2: The evaluation of solid waste must assess additive collection trips, including truck emissions and traffic congestion from pickup to final disposition of the discarded material, including impacts at the ultimate disposal site and transport corridors. (LESON_007, LESON_054)

Response 11-2: Delivery services, which include solid waste trucks, will be accounted for in the trip projections and analyzed as part of the traffic analysis in the EIS. With respect to emissions from these vehicles, as described in the Draft Scope of Work, a screening analysis will be conducted, and if any threshold referenced in the *CEQR Technical Manual* for conducting a mobile source air quality analysis is exceeded, then emissions associated with project-generated vehicles, including heavy-duty diesel vehicles, will be analyzed as part of the mobile source air quality analysis.

Comment 11-3: The solid waste assessment must be consistent with the findings under ZR Section 78-313, and found in compliance with all applicable subsections including (b), (c), (d), and (g). (LESON_007, LESON_054)

Response 11-3: The solid waste assessment will be prepared in accordance with *CEQR Technical Manual* methodologies.

Comment 11-4: The solid waste analysis should detail how the proposed projects would meet the Mayor's Zero Waste by 2030 goals. (TBTRA_055)

Response 11-4: The solid waste assessment contained in the EIS will be prepared in accordance with guidance contained in the *CEQR Technical Manual*.

ENERGY

Comment 12-1: A detailed assessment of the buildings energy impact is necessary, regardless of whether or not the proposed projects would consider generating substantial new consumption of energy; the entire area below Delancey Street is underserved by the existing utility grid. This is proven by the very often brownouts that happen during peak summer demand. The electric infrastructure needs major upgrades to deliver services to

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these new buildings. (Benitez_068, CB3_Rogers_005, CB3_Rogers_044, GOLES_Pinada_041)

There needs to be an assessment of the potential brownouts and blackouts that might happen in the area, taking into account how the increased frequency and intensity in extreme weather events, such as heat stress, might contribute to the higher emissions scenarios. (GOLES_Pinada_041, Riddle_029)

Response 12-1:

As noted on page 30 of the Draft Scope of Work, the *CEQR Technical Manual* recommends a detailed analysis of energy impacts for projects that could significantly affect the transmission or generation of energy. Because the proposed projects would not result in either of these conditions, a detailed assessment of energy impacts is not necessary. Nevertheless, the *CEQR Technical Manual* recommends that a project's energy consumption be calculated and disclosed. Therefore, the EIS will disclose the projected amount of energy that would be consumed by the proposed projects.

Comment 12-2:

The scope of the energy consumption analysis must include liquid fuel, natural gas, and electricity consumption, and should be integrated with the Air Quality analysis, especially as the energy production on- and offsite will create emissions directly attributable to consumption, operations, and maintenance of the projects. The scope of energy analysis should include, but is not limited to the following factors:

The capacity of delivery systems to provide sufficient fuel and electric energy based on transmission and capacity planning for New York City, especially in light of planned closure of the Indian Point Nuclear Power Plant as a source of electric generation for operation and maintenance of the projects;

Interference with substation capacity, demand management, or other energy efficiency programs mandated by City, State and federal law, as well as total energy consumption reduction programs advocated by all agencies and divisions of the government of the City of New York;

Current and future capital spending requirements for generation, transmission, distribution, and demand management system requirements for electricity service to sustain electric load requirement of the service area in which the projects will be operated and maintained that will be passed through to ratepayers in the same system;

Supply and delivery system capacity for natural gas consumption requirements of the projects, including transmission, distribution and delivery capacity in the service system area; and

Construction and placement capacity for the physical energy delivery components required, including pipes, wires, and other energy delivery infrastructure, with particular emphasis on availability subsurface, surface, and elevated capacity for safe emplacement of physical components. (LESON_007, LESON_054)

Response 12-2: The Energy analysis will be conducted in accordance with *CEQR Technical Manual* methodologies.

Comment 12-3: The scope of energy analysis should include Compliance with Section 78-313 Findings: The energy effects assessment must be consistent with Findings under ZR Section 78-313 of the City of New York, and found in compliance with all applicable subsections, including (b), (c), (d), and (g). In particular, the Findings should be based on sufficient information and analysis showing that the construction and operation of the buildings themselves, as well as energy, waste handling, and other operations and maintenance activities will not materially interfere with the energy infrastructure operating for the benefit of other buildings and residents in the LSRD. (LESON_007, LESON_054)

Response 12-3: The Energy analysis will be conducted in accordance with *CEQR Technical Manual* methodologies.

TRANSPORTATION

Comment 13-1: The Travel Demand Factors (TDF) Memo bases all of its traffic and parking assumptions on the Future with Proposed Actions from the incremental increases in the Reasonable Worst Case Development Scenario. Only the increase between the existing and proposed is being considered when determining which streets/intersection to study. Additionally, the Essex Crossing/Seward Park development is not mentioned nor considered for potential impact. Such a major development within a very close proximity with build years aligning with the Two Bridges application must be considered for potential cumulative impact. (LittleCherry_020)

The scope includes a traffic demand analysis, but that fails to address the huge impact the projects will have on existing parking and traffic, as well as the impact of other developments in the area, which are not included in the scope and should be (specifically as it's crossing Seward Park). There's a proposed NYCHA development which we've heard about, and also one at Manhattan Square. (LittleCherry_Stern_061)

Response 13-1: The TDF memo was prepared in accordance with the procedures prescribed in the *CEQR Technical Manual*. Chapter 16, "Transportation," of the *CEQR Technical Manual* prescribes a two-tiered screening process based on a proposed project's incremental trip-making in determining

whether detailed transportation analyses are warranted. This two-tiered screening process includes Level 1 (project trip generation) and Level 2 (project generated trip assignment) screenings. The results of the two-tiered screening process as presented in the TDF memo were reviewed with the lead agency and other expert agencies such as the NYCDOT and New York City Transit (NYCT) to determine the appropriate study areas for analysis.

The transportation analysis to be presented in the EIS will include an assessment of future conditions without the proposed projects (No Action condition), which will consider known background projects, including One Manhattan Square and Essex Crossing, and their anticipated trip-making independent of the proposed projects. Consistent with the procedures outlined in the *CEQR Technical Manual*, trip increments associated with the proposed projects will then be overlaid onto the No Action condition to identify potential significant adverse impacts. Where the potential for significant adverse impacts is identified, improvement measures would be developed to mitigate such impacts to the extent practicable.

Comment 13-2:

There needs to be consistency between the parking study area and the traffic study area. If the Grand and Clinton parking garage are in the parking survey, the surrounding intersections should be studied in the traffic analysis. We are also concerned about the assignment method being used in the technical memo included with the Scope, since it does not have vehicular trip assignments on Grand Street or on Clinton Street, north of Henry Street. (CB3_Rogers_005)

The study of Proposed Project Incremental Vehicle Trips needs to be adjusted to reflect reality. Several of these blocks were selected by the developers to skew the study data, while busier streets closer to the development are mysteriously absent from the study. Those of us who actually live in this community know that many of the Chinatown blocks indicated in Inset 3 on Page 69 such as Pell or Bayard Street are a mile away and will show little to no change in traffic from vehicles associated with the LSRD. The EIS should study blocks that will be most affected NOT currently included in the current scoping document - specifically Clinton Street north towards Grand Street, Essex Street, and Grand Street between Montgomery Street and Essex Street, many of which serve as approaches to the Williamsburg Bridge and are the major access points to and from the neighborhood. (Moskowitz_014, Moskowitz_065)

Response 13-2:

The trip generation estimates and assignment of projected trips onto the transportation network, as presented in the TDF memo, were reviewed with the lead agency and NYCDOT to identify an appropriate study area of intersections for evaluation of potential traffic impacts. Because the

parking resource currently available at Pier 42 is expected to be replaced with new development on that pier and Essex Crossing would generate a substantial parking demand for which very limited parking supply is being provided, it was assumed that the current parking demand at Pier 42 and new parking demand from Essex Crossing would use up most, if not all, of the available capacity at the Clinton Grand Parking garage, such that there would be limited opportunities left for future occupants of the proposed projects to make use of that parking resource. Additionally, trip assignments presented in the TDF memo represent a conservative depiction of anticipated trip-making by allocating vehicle trips to traverse the more critical and congested intersections in the study area. These intersections were then identified as the study area intersections for analysis of potential impacts.

Comment 13-3: The DEIS should use no counts more than three years old. CB3 strongly urges new counts be collected for the baseline analysis. (CB3_Rogers_005)

Response 13-3: Traffic count data used in the EIS analyses will not be more than three years old, consistent with *CEQR Technical Manual* methodology and guidelines.

Comment 13-4: The study should include an analysis of the increased impact of Uber and Uber type services which these combined developments will attract. This analysis should also include the increased traffic to the immediate entrances and exits to the FDR Drive. (CB3_Rogers_005, CB3_Rogers_044)

Because the area is inconvenient to the larger subway network, there is great concern in the community over the project's impact on surface transportation. Care should be taken when determining the mode split for new residents as they will likely not follow typical Manhattan patterns due to the project's distance from the subway. Mode split may be more like waterfront developments in Brooklyn and Queens than elsewhere in Manhattan. (CB3_Rogers_005)

Response 13-4: In accordance with the *CEQR Technical Manual*, the EIS will assess the proposed projects' potential effects on traffic, transit, pedestrians, parking, and vehicular and pedestrian safety. Existing conditions will be considered together with the projected growth in the area independent of the proposed projects and incremental trip-making associated with the proposed projects to identify potential impacts. Where impacts are identified, feasible mitigation measures will be recommended for implementation to the extent practicable.

As presented in the TDF memo, the residential modal splits were determined based on the latest Journey-to-Work (JTW) data from the 2011–2015 U.S. Census Bureau American Community Survey (ACS) for Manhattan census tracts 2.01, 6, 8, 14.01, and 16. The census tract area encompasses the census tract in which the project sites are located as well as the census tracts immediately bordering the project sites' census tract. The appropriate modal split profile, which takes into consideration for-hire vehicle usage, for the new residents were then determined and reviewed with the lead agency and NYCDOT for concurrence.

Comment 13-5: With the beautification of our neighborhood continuing more tourists than ever before are visiting. Tourists are not limiting themselves to weekday AM, midday and PM peak periods. This causes both foot and vehicle traffic. There needs to be traffic analysis on the weekends, particularly when Basketball City is having an event and there are public and private events including NY Party Cruise and the “Go New York Tour” launch by Pier 36. In addition, there are tour buses that drop off passengers at the intersection of South and Montgomery Streets. The tour buses that are park and/or idle along South Street by Montgomery negatively impacts the traffic and safety of pedestrians and other moving vehicles. Project impacts under these conditions should be analyzed in the EIS. (LEOTA_009, LEOTA_Echevarria_078, Ramirez_056, TBTF_052, TBTRA_055, TBTTA_Mak_012)

Response 13-5: The appropriate analysis time periods were determined in consultation with the lead agency and NYCDOT based on their review of the TDF memo and the amount of traffic expected to be added by the proposed projects to the area's transportation network, accounting for various modes of transportation, in accordance with the procedures prescribed in the *CEQR Technical Manual*. As stated in the *CEQR Technical Manual*, Section 332, “Determination of Peak Periods” (page 16-18), transportation analyses of potential impacts associated with residential uses are typically conducted for weekday peaks only. As described in the Draft Scope of Work, the proposed sites would be developed with primarily residential use.

Comment 13-6: Due to the proximity of our neighborhoods' namesakes, the bridges, traffic is horrendous and dangerous. Cherry Street receives an overflow of traffic when the FDR is congested. Clinton Street is backed up from Delancey Street to the FDR with vehicles trying to get to the Williamsburg Bridge. What impact will the projects have on these traffic flows? (LEOTA_009, LEOTA_Echevarria_078)

They are not planning on additional traffic being a huge barrier. What do they think will happen to our streets the vehicles associated with 5,000 new units are added to our local streets? (Hawkins_002)

Traffic is frequently causing traffic problems on the FDR. (Mobley_040, Yuen_001)

Response 13-6:

In accordance with the *CEQR Technical Manual*, the EIS will assess the proposed projects' potential effects on traffic, transit, pedestrians, parking, and vehicular and pedestrian safety. Existing conditions will be considered together with the projected growth in the area independent of the proposed projects and incremental trip-making associated with the proposed projects to identify potential impacts. Where impacts are identified, feasible mitigation measures will be recommended for implementation to the extent practicable.

The commenter's claim of 5,000 new units coming on line from this land use application is incorrect. As noted in the Draft Scope of Work, the proposed projects would introduce approximately 2,775 new residential units.

Comment 13-7:

The addition of 6,000 residents on this small three-block section of lower Manhattan would create a permanent unsustainable traffic jam and unsafe street conditions on a street which is used more as a highway than a residential street. (Ramirez_022, Ramirez_056)

Response 13-7:

The EIS will account for changes in the surrounding roadway network and analyze the potential traffic impacts associated with the proposed projects. As noted in the Draft Scope of Work, the proposed projects would introduce approximately 2,775 new residential units that would generate trip-making by various modes of transportation (not just vehicle trips), as detailed in the TDF memo. Where impacts are identified, improvement measures will be developed to mitigate such impacts to the extent practicable.

Comment 13-8:

Congested streets already make access to emergency service a critical issue in our neighborhood. What would happen when the same responders now have to serve an additional 2,775 households? (Marte_027)

Response 13-8:

The transportation analysis in the EIS will be prepared in accordance with requirements prescribed in the *CEQR Technical Manual* and address potential impacts created by the proposed projects and recommend measures to mitigate these potential impacts to the extent practicable.

Comment 13-9:

The car traffic is interfering with public transportation, actually challenging them physically on narrow streets. (Riddle_029)

By Pier 35, there are three active parking lots for sanitation and EMT vehicles - most people don't know it's an active driveway since it's not clearly marked or defined. Also examine impacts of vehicles turning into and out of the FDNY and Dept. of Sanitation facilities. (TBTTA_Mak_012)

Examine impacts of additional sanitation pickup on traffic patterns, especially on South Street. (TBTRA_055)

Response 13-9: In accordance with the *CEQR Technical Manual*, the EIS will assess the proposed project's effects on traffic, transit, pedestrians, parking, and vehicular and pedestrian safety. As shown in the TDF memo, several intersections along South Street (including at Rutgers Slip and Clinton Street) have been identified for analysis. To the extent activities associated with FDNY and DSNY are captured in baseline traffic activities for the assessment of existing traffic conditions, they would be part of the analysis in the determination of potential traffic impacts. Additionally, delivery-related trips, which encompass sanitation pickup activities, were accounted for in estimating trip-making associated with the proposed projects, and will be included in the EIS's impact analysis.

Comment 13-10: The lead agency must demonstrate that current conditions continue to meet the "well served [by transportation]" standards. The ability to meet the flow and service conditions presumed by C6-4 zoning has a direct bearing on the granting of this Special Permit as a major modification, since resident and trip loads that exceed the C6-4 zoning parameters could be construed as a functional variance of the current zoning in addition to a major modification of a Special Permit. (LESON_007, LESON_054)

Response 13-10: The EIS will analyze the potential for the project to cause significant environmental impacts to Transportation pursuant to *CEQR Technical Manual* methodologies. The Transportation analysis may inform findings made by the CPC under the Minor Modification process.

TRANSIT

Comment 13-11: The EIS should include a study of the effects on public transportation and bike transportation. (Benitez_068)

Response 13-11: In accordance with the *CEQR Technical Manual*, the EIS will assess the proposed projects' effects on traffic, transit, pedestrians, parking, and vehicular and pedestrian safety. As noted in the Draft Scope of Work, a detailed analysis of the East Broadway subway station and ridership on the F line will be included in the EIS. Bike travel will be accounted for, where appropriate, in the traffic and pedestrians analyses, as well as in

the evaluation of crash data related to the vehicle and pedestrian safety assessment.

Comment 13-12: The addition of approximately 660 residential units at 247 Cherry Street, approximately 1,350 residential units at 260 South Street and approximately 765 residential units at 259 Clinton Street warrants the consideration and analysis in the EIS process of an addition of uptown and downtown M15 Select buses for Pike Street between Madison and Henry Streets. (LESPP_013, Moskowitz_014, Moskowitz_065)

There needs to be a capacity analysis of the bus routes serving the area. The addition of such a large number of residents in an area without good subway access, and no additional onsite parking, suggests that buses will get a larger than typical proportion of the mode split. If significant impacts are shown, the lead agency should work with the Metropolitan Transportation Authority (MTA) and New York City Transit (NYCT) to mitigate the impact by increasing service along the lines that are projected to be impacted. (CB3_Rogers_005, CB3_Rogers_044, TBTF_052)

Response 13-12: As presented in the TDF memo, which was prepared in accordance with the two-tiered screening procedures prescribed in the *CEQR Technical Manual* and has been reviewed and approved by the lead agency and NYCDOT, the incremental bus trip-making generated by the proposed projects would be dispersed among the area local bus routes including the M9, M15, M15 SBS, and M22 bus routes such that no single bus route would exceed the *CEQR Technical Manual* analysis threshold of 50 or more peak hour bus riders in a single direction to warrant further detailed bus line-haul analysis. As such, the EIS will not consider potential bus service changes to address needs attributable to the proposed projects. However, NYCT regularly monitors changes in ridership and modifies service on an as-needed basis, subject to their fiscal and operational constraints.

Comment 13-13: The developers are falsely claiming that bus ridership will be so minimally affected that they don't even have to study the bus lines serving the neighborhood! As a frequent user of the buses and trains on the Lower East Side, I can tell you that they are already strained to the breaking point. A more densely populated neighborhood means even more commuters. How can the developers not study this?! (Hawkins_002)

I'm also concerned, of course, about the two MTA bus lines and the same issue of how they're going to serve residents when so many more are in the neighborhood. (Brewer_045)

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The developers are making claims about bus ridership and supported zero impact these projects will have, though there is no research to support these claims. (Klempay_017, Newton_015, Wolf_019)

Response 13-13: As detailed in the TDF memo, the two-tiered screening procedures prescribed in the *CEQR Technical Manual* were used to identify transportation elements that should be subject to detailed analyses in the EIS. A detailed description of the traffic, pedestrian, subway, and bus study methodology will be included in Chapter 14, “Transportation” of the EIS. See also response to Comment 13-1.

Comment 13-14: Study bus ridership of the M15 bus lines for schools in District 1 (i.e., compile the number of bus metro cards distributed in District 1 schools). (TBTRA_055, TBTTA_Mak_012)

Response 13-14: Please refer to response to Comment 13-13.

Comment 13-15: Residents want a clean train station with safe and accessible platforms. They want regular and reliable bus service. (NYCC_Chin_059, NYCC_Chin_060)

Response 13-15: Chapter 14, “Transportation” of the EIS will include an analysis of the potential for the proposed projects to result in significant adverse impacts relating to subway accessibility. If and where the potential for significant adverse impacts is identified, mitigation measures would be advanced to address these impacts.

F TRAIN

Comment 13-16: Capacity and access of the F train’s East Broadway stop is a challenge. In a neighborhood with lot of seniors, it is the only train station for over a half mile in any direction. It should be accessible in accordance with Americans with Disabilities Act standards. (Brewer_004, Brewer_045) I request that DCP, DOT, NYCT, and all relevant agencies coordinate with the MTA in advance of any plans being approved. I also ask that the City and developers look into providing a shuttle around the LSRD area that can take seniors and those with disabilities to and from the M22, M15, or F train stop, as well as an examination of the timeliness and overcrowding of those two MTA bus lines. (Brewer_004, LESPP_Jones_047) Examine the impact of adding an entrance and elevator at the Madison and Rutgers station due to the influx of seniors in this area. The closest elevator station is Delancey. (TBTF_052, TBTRA_055, TBTTA_Mak_012)

The already strained nearby subway stations will see an increase in usage as the proposed projects come online, including the East Broadway subway station on the F line, and the Grand Street Station on the B and D lines. The Delancey /Essex station is the only station in the area with an

elevator. We are concerned that the neighborhood's bus and subway infrastructure are insufficient to meet the increased need. (Reyes_070, Squadron_006, TBTF_052)

Response 13-16:

As detailed in the Draft Scope of Work and the TDF memo, the Transportation chapter of the EIS will include a detailed assessment of the East Broadway subway station (F line)—station control area and circulation elements, and line-haul conditions on the F line. Where potential impacts are identified, feasible mitigation measures will be recommended and explored with NYCT for implementation to the extent practicable. In regard to the examination of MTA bus lines in the area, the analyses presented in the TDF memo demonstrated that a detailed bus line-haul analysis is not warranted. However, NYCT regularly monitors changes in ridership and modifies service on an as-needed basis, subject to the agency's fiscal and operational constraints and, if implemented, is expected to take place over time.

Comment 13-17:

Consider adding new F train entrance at the intersection of Madison and Rutgers because this entrance is the closest to all the proposed projects and it will be highly utilized to the point of being impassable.

Consider the following improvements for East Broadway station:

- installing more turnstiles - currently, there are three turnstiles and at least one constantly breaks down
- adding an additional train (we only have the F train) to run the same route in order service the increase commuter population in this area and the other heavily, populated lower east side neighborhoods like Delancey Street, 2nd Ave. Houston St, etc.
- widen the East Broadway subway platform area by removing a handful of unused, locked staircases
- East Broadway subway station desperately needs a complete overall in terms of remodeling because of the lack of maintenance, depilated conditions like leaky, rusty ceilings; big cracks in the tiled walls; piles of sewage in the locked stairways and on the tracks, etc.(TBTTA_Mak_012)

Response 13-17:

Changes to the transit infrastructure are under the purview of NYCT and are in general beyond the scope of this environmental review. However, as described in the Draft Scope of Work and several of the responses presented above, the EIS will evaluate the proposed projects' potential impacts on the East Broadway subway station and the F line. Where potential impacts are identified, feasible mitigation measures will be recommended and explored with NYCT for implementation to the extent practicable.

Comment 13-18: In 2021, MTA is proposing to take the F train offline (with no definitive timeline on how long repairs will take) to repair damages caused by Superstorm Sandy; coincidentally, this is the around the same year when the trio of residential skyscrapers will bring an influx of resident commuters. How will the MTA repairs affect transportation patterns? What are the alternative modes of transportation? (TBTF_052, TBTRA_055, TBTTA_Mak_012)

In addition to the East Broadway station on the F, the Grand Street Station on the B and D line will likely get additional usage from the development, but no trips are assigned to the Grand Street station. A line-haul analysis should be conducted of the B and D subway lines as well. (Brewer_045, CB3_Rogers_005, LESPP_013)

Response 13-18: As part of routine repair and/or major capital projects undertaken by NYCT, the affected services need to be taken offline to allow for such efforts to proceed. For major service disruptions, such as the imminent shutdown of the L train service to Manhattan, NYCT would conduct advanced planning and community outreach, and devise mitigation strategies to lessen the adverse effects on commuters. The same is expected for potentially taking the F train offline, which is currently anticipated to begin in 2021, and the related efforts are expected to take into account the additional demand generated by the proposed projects.

With regard to the Grand Street Station, due to relative distances to the projects sites from the two stations and transfer opportunities available to the F line, only a nominal number of project-generated pedestrian trips are expected to pass the East Broadway subway station (F line) and go to the Grand Street Subway Station. These pedestrian trips were determined to be below the *CEQR Technical Manual* thresholds to warrant any further evaluation of that station or the B and D lines.

Comment 13-19: The condition of the East Broadway station is terrible. Any capacity analysis of this station's stairways and platforms should take into account the current lack of maintenance. Mitigation of the impact to the East Broadway station should include elevators and electrical escalators on each side of the platform. (Brewer_045, CB3_Rogers_005, LESPP_013, Soto_066, TBTF_052, TBTRA_055)

The volume of ridership on the F line at the East Broadway station will increase exponentially. What will be done about platform safety to accommodate the sheer volume of riders? Also, what will be done about the transients who have made the underground passageway between East Broadway and Madison Streets their shelter and an overall cesspool? (Pang_023)

The F train is becoming increasingly crowded by the day and adding thousands of people to the area will only exacerbate the problem. There have been accidents and numerous delays in part due to the crowdedness of the trains. This problem also extends to the FDR drive. Traffic is frequently causing crowding problems on the FDR. Exits are at times almost unnavigable. (Mobley_040, Yuen_001)

Response 13-19: As detailed in the Draft Scope of Work and the TDF memo, Chapter 14, “Transportation,” of the EIS will assess the proposed projects’ potential impacts on the surrounding transportation system, including the traffic network and the East Broadway subway station (F line). To the extent that the proposed projects in the Two Bridges LSRD are projected to result in significant adverse impacts, mitigation measures would be advanced (see also Response 13-17). The physical state and operation of the station are under the purview of NYCT and are outside the scope of the EIS Transportation analysis.

PEDESTRIANS

Comment 13-20: High volume, dangerous/chaotic traffic intersections near the FDR and South Street need to be meticulously studied for traffic flow and pedestrian safety improvements. Examine the crosswalks adjoining Montgomery, South, and Water Streets. (TBTF_052, TBTRA_055, TBTTA_Mak_012)

Response 13-20: In accordance with the *CEQR Technical Manual*, the EIS will assess the proposed project’s effects on traffic, transit, pedestrians, parking, and vehicular and pedestrian safety. As detailed in the Draft Scope of Work and the TDF memo, traffic conditions will be studied for a large number of intersections, including several along South Street and Montgomery Street. An examination of crash history at these locations will also be undertaken to identify safety issues, if any, and provide safety improvement recommendations where appropriate. With regard to pedestrian analysis locations, they were selected, in accordance with *CEQR Technical Manual* guidelines, based on the incremental trips expected to be generated by the proposed projects. The crosswalks adjoining the streets mentioned in the comment would not incur project-generated pedestrian trips that would exceed the CEQR thresholds to warrant a detailed analysis.

Comment 13-21: Sidewalks are another overlooked aspect of transportation. There are fixtures, potholes, cracked walkways all around the area. Up from Henry and Madison, large sidewalk cracks are not only dangerous to pedestrians; they’re access points for rats and can exacerbate rodent issues. (Brewer_004, Brewer_045)

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- Response 13-21:** As detailed in the Draft Scope of Work and the TDF memo, Chapter 14, “Transportation” of the EIS will include a detailed pedestrian analysis of operating conditions (i.e., volumes, pedestrian flow, and service levels) on sidewalks, at street corners, and in crosswalks surrounding the project sites and along adjacent streets and avenues, in accordance with guidelines outlined in the *CEQR Technical Manual*. The physical state of City sidewalks, as described in Comment 13-21, and related rodent issues are under the purview of NYCDOT and are outside the scope of the transportation analysis of the EIS.
- Comment 13-22:** Improvement measures that only identify high accident locations are not enough. For every accident, there were countless near misses. Any accident victim is one victim too many. Human life should not be reduced to a mere statistic. For this reason, we need to expand the study area to a half mile boundary. Let’s comply with Mayor de Blasio’s Vision Zero. We need to be proactive in preventing fatalities or serious injuries in our city streets. Without cameras, nothing will deter vehicles and their frustrated drivers from disobeying the rules of the road. Therefore, anything that can be done to protect pedestrians should be implemented. The simplest approach would be to stop—to put stop signs, two-way or three-way, at all pedestrian crossings with bright crosswalk markings on the street. With almost 9,000 new residents, and every life precious, it is imperative that Vision Zero in the Two Bridges neighborhood become a reality right now. (LEOTA_009, LEOTA_Echevarria_078)
- Response 13-22:** Mayor de Blasio’s Vision Zero plan has resulted in many safety improvements across the City, and there are continuing efforts to introduce more safety treatments over time. The *CEQR Technical Manual* provides specific guidelines as to what constitutes a “high accident” location—48 total vehicle-related crashes or 5 or more pedestrian/bike related crashes in any 12-month period within the last three years for which data are available. As part of the EIS Transportation analysis, these “high accident” locations, if any, will be identified and improvement measures that are in conformance with NYCDOT standards will be recommended. It should be noted that the proposed projects would introduce approximately 2,775 residential units, which are projected to generate approximately 6,000 new residents.
- Comment 13-23:** Add reflective road poles on South Street to distinctively define the edge of the curb and traffic lane to benefit bicyclists, pedestrians and motorists, as well as those who are visually impaired.
- Align crosswalks at Rutgers and Cherry Streets; Remove the dilapidated, rat infested corner green plant beds (on Rutgers/Cherry and Rutgers/Madison) to install a mid-section section walkway to allow the

influx of pedestrian foot traffic; this will help align the cross walks; on Rutgers/Madison Street, add back the additional parking spaces that were previously there but were removed when they repaired Rutgers Street.

The two-way bike lanes on a one-way Clinton Street have proven dangerous for pedestrians (especially kids and seniors) who are accustomed to looking only one way before crossing. Remove bike lane from Clinton/Cherry to Clinton/South Street. Improve signage or one-way bike lanes, and add bicycle flashing light signals along Clinton Street (TBTRA_055, TBTMA_Mak_012)

Response 13-23: As part of the EIS Transportation analysis, improvement measures will be identified to the extent necessary to mitigate significant adverse impacts, if any, attributable to the proposed projects. These improvements may potentially address some of the issues raised in the comment. However, most are outside of the scope of this analysis and should be directed to NYCDOT for that agency's consideration.

Comment 13-24: The DEIS should include an analysis of the increased bike ridership that will come to the area and how the City and developers can mitigate impacts, including potential conflicts between vehicular, bicycle, and pedestrian traffic. (CB3_Rogers_005)

Response 13-24: As the number of Citi Bike stations continues to climb and the bicycle infrastructure (i.e., shared and dedicated bike lanes) improves, it is anticipated there would be increased bike ridership across the City. NYCDOT regularly monitors the growing bike usage and plans for/implements changes to its roadways to better accommodate various users (i.e., vehicles, bicycles, and pedestrians). For the EIS, all road users will be accounted for in the Transportation analysis to identify potential significant adverse impacts for which improvement measures will be explored to mitigate those impacts to the extent practicable.

PARKING

Comment 13-25: The Scope states that only on-site parking will be examined. The DEIS should also perform an on-street parking analysis as detailed in the *CEQR Technical Manual*. This analysis should include a detailed map indicating the key parking regulations on block faces within convenient walking distance of the project site. (CB3_Rogers_005, TBTF_052)

Response 13-25: The Draft Scope of Work states that "a parking survey will be performed to collect information on the off-street parking supply and utilization within ½-mile of the project sites. For the proposed actions, a parking demand projection will be prepared to determine how the future demand could be accommodated on-site or at surrounding parking resources and to identify potential parking shortfall, if any." Chapter 14,

“Transportation,” of the EIS will also include, in accordance with *CEQR Technical Manual* guidance, an inventory of curbside regulations within the same parking study area.

Comment 13-26: The Scope is silent on how parking shortfall is determined. The threshold should be clearly stated and justified. Further, any shortfall that may be met by on-site parking further than ¼ mile from the project site, should be considered when developing mitigation plans for unmet shortfall created by the project. (CB3_Rogers_005)

Response 13-26: The EIS’s parking analysis will be prepared in accordance with guidance prescribed in the *CEQR Technical Manual* by comparing projected parking supply and demand to determine if there would be a potential for a parking shortfall attributable to the proposed projects. However, the *CEQR Technical Manual* also states that for proposed projects located in Manhattan, the inability of the proposed project or the surrounding area to accommodate the project’s future parking demand (i.e., a parking shortfall) is generally not considered a significant adverse impact due to the magnitude of available alternative modes of transportation.

Comment 13-27: Traffic and parking in this community is already at a near unmanageable amount. Parking lots are full and already have month to years long waiting lists. (Klempay_017, Newton_015, Wolf_019)

In regard to parking, they are claiming local lots have 3,000 spot capacity, but when considering lots with waiting lists and pending closures there are actually a negative amount of spots available. (Hawkins_002)

How will the lack of proposed parking be mollified by the 1,900 existing parking spaces in eight additional off-street parking facilities within a ½-mile study area of the project site, to which the Draft Scope of Work alludes? (MAS_Negret_016)

Response 13-27: The TDF memo presented statistics on the study area’s current parking supply and utilization. There are 3,085 licensed parking spaces allocated in public parking facilities within ½-mile of the project sites; these are not the actual number of available spaces at any given time. Parking utilization and availability data, which were estimated based on interviews with attendants at these parking facilities, showed varying degrees of utilization and availability during different times of the day. The EIS’s parking analysis will take into consideration the above existing conditions, estimated demand generated by other nearby projects, and anticipated new demand from the proposed projects to determine if there would be a potential parking shortfall attributable to the proposed projects.

Comment 13-28: For the parking study area, you should keep it to the ¼ mile study area radius because this clearly enhances the fact that there is a lack and scarcity of parking lots and spaces in our neighborhood area, which is only going to worsen during and after construction.

- Examine South Street—get rid of overnight tour bus and commercial parking and change it to personal vehicle parking on Sunday to Saturday.
- Examine why there are at least twenty-five personal vehicles parked on a locked PS 184 Shuang Wen school playground on Saturday, April 22? Explain who authorized this, whose cars do they belong to and whether this is a reoccurring issue? (TBTRA_055, TBTTA_Mak_012)

Response 13-28: As there is limited off-street parking availability within the ¼-mile radius, the parking study area was expanded to ½-mile of the project sites to identify additional parking resources to which project-generated trips can be assigned.

South Street, on the north side, in the vicinity of the project sites is generally governed by no parking/standing regulations during weekday daytime hours. There are also some nighttime regulations that restrict parking for street cleaning purposes on alternating days. Hence, personal vehicle parking is already permitted outside of these restricted hours. Regarding the removal of overnight tour bus and commercial parking, this is something the community can explore with NYCDOT and the NYPD, but it is outside the scope of the EIS studies. Similarly, use of the PS 184 playground for purposes other than a children’s recreational space is not related to the proposed projects or the EIS analyses.

Comment 13-29: The developers are not using standard data collection procedures. When they didn’t get the desired results by studying parking with ¼ mile, they simply changed the parameters of the study to ½ mile. The parking study on pages 64-65 of the scoping document includes many mistakes and bad estimates. Even within the expanded study area, there are not 3,085 available parking spots:

- One of the lots (#2) with 63 spots has already closed. Leaving 3,022 spots to analyze.
- Two of the lots (#1 & #10) encompassing 857 of the 3,085 spots are planning on closing, leaving 2,228 spots to analyze.
- Out of the remaining 14 lots, the vast majority are at capacity with waiting lists, reducing 2,228 spots to close to zero.

Although the zoning of the LSRD site does not require parking, the reality is that there are going to be thousands more vehicles in this neighborhood that need spots. What is the developer’s actual plan to address this? (Moskowitz_014, Moskowitz_065, Moskowitz_086)

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The scope's stated number of parking garages within one-quarter mile is simply flat out inaccurate and untrue. The scope asserts that there are nine garages within a quarter of a mile. Upon completion, the actual number of garages will be only two. And both of these garages already have long waiting lists. (LittleCherry_Spindler_062, LittleCherry_Stern_061)

Response 13-29: As noted in the TDF memo, the parking inventory was conducted prior to when the Draft Scope of Work was issued for public review and acknowledged that parking facility #1 is planned for redevelopment. The EIS will take this comment into consideration and revise the parking statistics as needed, and analyze anticipated future changes in the study area's parking supply and utilization. Any potential parking shortfalls will be disclosed. See response to Comment 13-26.

Comment 13-30: The developers in the scope propose adding over 2,700 new residential units into the area, yet they do not include a single additional parking space. Where are all those new residents going to park? (LittleCherry_Spindler_062, LittleCherry_Stern_061)

While there are many who now ride bikes, what about parking for those who own cars? Where will parking exist—for residents? (Pang_023)

Response 13-30: The EIS will evaluate parking availability within a ½-mile radius from the project sites, following the guidelines prescribed in the *CEQR Technical Manual*, and determine if there would be a potential for a parking shortfall. See also response to Comment 13-27.

Comment 13-31: The drastic lack of parking fails to account for the car ownership rates for nearly 3,000 anticipated apartments. The failure to consider parking will have a significant impact on traffic, air quality, due to idling and circling, and general quality of life given the hundreds of cars in search of parking. (LittleCherry_020)

Response 13-31: Consistent with the guidelines presented in the *CEQR Technical Manual*, the parking demand projections for the proposed projects will consider car ownership and auto usage rates representative of this part of Manhattan. These projections will be analyzed together with the parking supply and demand under existing conditions and future without the proposed projects to determine if there is a potential for a parking shortfall. See also responses to Comments 14-1 and 13-27.

AIR QUALITY

Comment 14-1: The 2,775 new residential units will bring cars and activity that will negatively impact air quality in and around the site. The lack of additional parking will mean that hundreds of cars will be circling and idling at all hours of the day and night, in a constant search for parking. These cars

will create air quality conditions that must not be overlooked. (LittleCherry_020)

Response 14-1: As noted in the Draft Scope of Work, potential air quality impacts from vehicular emissions (mobile sources) due to the proposed actions will be evaluated, as per the *CEQR Technical Manual*.

Comment 14-2: When 257 Clinton Street (aka 275 South Street) was constructed in 1977, the City required air conditioning units for the apartments facing the FDR Drive. This was due to the acknowledgement that carbon dioxide from the constant traffic of cars on the FDR was an unhealthy byproduct and tenants needed to protect themselves the best they could. (Ramirez_022, Ramirez_056)

Response 14-2: As described in the Draft Scope of Work, an assessment of potential impacts associated with mobile source emissions from traffic on the elevated FDR Drive will be conducted for the EIS.

Comment 14-3: The MOVES data is insufficient as it relates to ZR 78-311 and 78-312. (LESON_007, LESON_054)

Response 14-3: MOVES is a model developed by the EPA for mobile source modeling as referenced in the *CEQR Technical Manual* and used in the assessment of the potential for significant adverse environmental impacts.

Comment 14-4: The EIS needs to fully examine the implications and mitigations required as a result of the Site 5 air quality (E) Designation. (TBTRA_055)

Response 14-4: The existing (E) Designation for air quality on Site 5 (Lot 2) was established in connection with the 2013 *Two Bridges (Health Care Chaplaincy) Environmental Assessment Statement* (CEQR No. 12DCP157M, M120183ZSM). As noted in the Draft Scope of Work, an air quality analysis will be performed for the proposed projects. If necessary, a revised air quality (E) Designation would be proposed for Site 5 and/or the other projects sites, to ensure that there are no significant adverse air quality impacts with the proposed actions.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Comment 15-1: Proposed projects must be in line with the Mayor's current 80 percent GHG reduction by 2050. Details of this alignment should be included in the DEIS. (CB3_Rogers_005)

The EIS should include a study of the effects on climate change. (Benitez_068)

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The EIS should include detailed information on energy reduction technologies. The proposed projects must comply with the Mayor's 80 percent reduction in GHG by 2050. (TBTRA_055)

Response 15-1: As described in the Draft Scope of Work, the Greenhouse Gas Emissions and Climate Change chapter will include a study of the potential effects of the proposed projects on climate change as represented by the projects' projected greenhouse gas (GHG) emissions, the energy efficiency measures to be included, and consistency with the City's policies regarding GHG emissions.

Comment 15-2: The DEIS should include an explanation and justification of the "Future Flood Level" projections used in the Flood Elevation Worksheet. Flood projections should extend throughout the expected life of the buildings (100 years), and therefore should at least be outlined up to the year 2120. (Angotti_071, CB3_Rogers_005, CB3_Rogers_044)

Response 15-2: The selection of future flood level projections will be according to the guidance provided by the City, which is in agreement with the common approach in the industry and in other jurisdictions, including the selection of levels that are relevant for the lifetime of the use. Per the guidance, since residential uses are expected to last 80 to 100 years or more, the latest projections will be considered. The latest projections recommended by the New York City Panel on Climate Change (NPCC) and New York State, similar to other efforts internationally, are for 2100.

Comment 15-3: The DEIS must address the fact that current resiliency zoning, to be permanently enacted following executive orders post-Sandy, does not help existing buildings. If new developments do not take a holistic look at the entire zoning lot, existing buildings and the existing population will remain vulnerable to flood and climate events. The developers should do all they can to ensure that not only the residents of the three buildings are protected from a natural disaster but all of their neighbors. (Brewer_004, Brewer_045)

Response 15-3: Flood resiliency zoning provisions currently in effect were adopted by the City Council on a temporary basis following the post-Sandy Executive Order. The provisions are intended to provide zoning relief as necessary in order to allow development to meet the floodplain management requirements of the NYC Building Code. Building Code requirements apply to new construction, substantial improvements to existing buildings, as well as some alterations and enlargements to existing buildings. The City is currently designing and reviewing an integrated flood protection system for the Two Bridges neighborhood as part of the larger Lower Manhattan Coastal Resiliency Project, which would span the Lower Manhattan waterfront from Montgomery Street to

the northern end of Battery Park City, and which also connects with the ongoing East Side Coastal Resiliency Project, which would extend from East 25th Street to Montgomery Street. The EIS will reflect the latest information regarding the City's efforts to improve the resilience of Lower Manhattan to severe storm flooding and will include a description of the resilience measures that will be undertaken to protect existing buildings on the project sites. In parallel, CEQR requires an analysis of the effects of climate change in the context of a proposed project. The potential effects of the proposed projects will be evaluated as described in the Draft Scope of Work, consistent with *CEQR Technical Manual* guidance and methodologies.

Comment 15-4:

One of the most significant concerns is that the entire scope of the proposed building project will be built on land which has been designated by FEMA and the New York City Emergency Management Agency as in an extremely high risk flood zone known as Zone A. Per the NYCEMA, "residents in Zone A face the highest risk of flooding from hurricane storm surges." During Superstorm Sandy lower Manhattan, and this community, was hard hit by the rising East River surge severely flooding the area and causing significant property damage. Many sections in lower Manhattan, and this community, which are all part of Zone A, are still recovering from the damage caused in 2011. The effects of continued storm surges can be seen today throughout the entire waterfront. It therefore seems ludicrous, irresponsible, dangerous and an abdication of civic duty to knowingly and deliberately approve construction of six, 70-story towers in a known high risk flood zone. Does not real estate property law require the seller to disclose all facts known to materially affect the value or desirability of property and if a property is in a known high risk flood zone is there not an obligation to communicate this information to buyers (those purchasing condos) of said property? More importantly however, why would the City of New York willfully allow a developer to endanger the lives of 6,000 innocent people and knowingly place them in harm's way? (Ramirez_022, Ramirez_056, Rosenberg_057)

The Draft Scope of Work states that the EIS will include an analysis of the potential impacts of such storms on the projects. The risks posed by such storms and the approach proposed to protecting residents and property will be fully disclosed in the EIS. New York City Emergency Management has updated the Hurricane Evacuation Zones and no longer uses the "A" zone terminology. The project sites includes zones 1, 2, and 3 based the relative need to evacuate given a storm prediction. In addition to these zones, the project sites are within the FEMA-designated one percent annual chance floodplain. Lower Manhattan, especially the Two

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Bridges community, was heavily impacted by Superstorm Sandy. Two Bridges and other parts of the Lower East Side experienced flooding, power outages, and additional disruptions due to the storm. Given the ongoing efforts by the City's Office for Recovery and Resiliency on the Lower East Side, particularly in Two Bridges, this draft EIS must take into account the different impacts on resiliency plans for the community, particularly the East Side Coastal Resiliency project. (Squadron_006)

Response 15-4: The proposed projects would not interfere with the East Side Coastal Resiliency (ESCR) project. The analysis will consider the status of resiliency planning for the area, including the ESCR and LMCR projects, but the proposed projects' resiliency strategies will not depend upon these independent initiatives that are likely to be completed after construction of the proposed developments.

Comment 15-5: LESPP advocates for development or enlargement that maximizes Climate Change resilience and adaptation measures relating to built form and permeable surfaces. (LESPP_013, LESPP_Jones_047)

Response 15-5: As indicated in the Draft Scope of Work, the EIS will describe anticipated resiliency measures for the proposed buildings which are being designed in consideration of potential future climate conditions. In addition, the resiliency measures would be consistent with resiliency planning for the area, including the ESCR and LMCR projects.

Comment 15-6: Examine sea-level rise as a major factor influencing land use trends. The area lies in Category 1 Hurricane Storm Surge Area and in Evacuation Zone A. The magnitude of these residential developments must be examined in relation to vulnerability, disaster preparedness, mitigation and the ability of front-line responders to rescue families to safety in a Superstorm Sandy-like situation. (Ramirez_056, Rosenberg_057, TBTF_052, TBTRA_055, TBTTA_Mak_012)

Response 15-6: As described in the Draft Scope of Work, the EIS will consider sea level rise and changes in storm frequency projected to result from global climate change and the potential future impact of those changes on project infrastructure and uses. Sea level rise through the projected lifespan of the buildings (through 2100) will be considered in the EIS as part of the Waterfront Revitalization Program (WRP) assessment. The EIS will include an analysis of the potential impacts of future coastal storms on the proposed projects. The approach proposed to protecting residents and property, and risks and proposed solutions will be disclosed.

Comment 15-7: The city's own resiliency policies accept that planning for development along the waterfront, particularly in vulnerable areas like lower Manhattan, requires long-term analysis and solutions involving residents

and communities. It makes no sense to build so much in an area already known to be extremely vulnerable to flooding. It is not good enough to mitigate the danger through building design; even if the new buildings were to be protected in a catastrophic flood, the adjacent buildings could be so severely damaged they would have to be abandoned. This is not a resiliency strategy but an environmental injustice. It does not recognize the importance of planning with and for communities. And if anything, flood risks are likely to be underestimated given the uncertainties about global warming. (Angotti_011)

Response 15-7: The fact that existing buildings may be vulnerable to flooding while the proposed projects would be protected due to current design standards is not an effect of the proposed projects. In general, while the City’s overall approach to resilience is not a topic for the EIS analysis, we note that the City has an extensive on-going process for advancing resiliency policies to address these questions for all coastal areas.

The EIS analysis will include the range of uncertainty regarding flood risk identified by NPCC. While it is possible that additional risk may be identified in the future, the current range of projections includes additional sea level-rise potential associated with potential changes in the mass balance and flow of ice sheets and glaciers.

NOISE

Comment 16-1: The Scope acknowledges the public health risks associated with building the towers within 200 feet of a major freeway. However, the mitigation offered in advance is inadequate—building window attenuation. This assumes a neighborhood that must live with their windows closed and requires year-round heating and air conditioning. This is not sustainable, either as public health or energy policy. Does the CPC really want to plan for a city in which safe spaces are locked inside towers lining highways? (Angotti_011)

Response 16-1: The Draft Scope of Work describes an analysis of noise exposure at new noise-sensitive land uses (i.e., residential and open space) included in the proposed projects as directed by the *CEQR Technical Manual*. The analysis will determine the amount of noise exposure at these newly based on noise level measurements, acknowledge and disclose any instances of noise levels that exceed the recommended thresholds for the proposed land uses, and propose practicable and feasible measures to reduce noise levels to within the acceptable range where necessary. For residential uses, these measures include building facade attenuation and alternate means of ventilation to allow for the maintenance of a closed-window condition. These are the typical measures employed for newly

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constructed residences in areas with high noise levels, as specified by the *CEQR Technical Manual*.

Comment 16-2: It is also necessary to be able to close windows in order to drown out as much of the traffic noise as possible, which is nonstop. (Ramirez_022, Ramirez_056)

Response 16-2: As described in the Draft Scope of Work, for newly introduced residential uses where noise exposure would exceed the level considered acceptable according to *CEQR Technical Manual* noise exposure guidelines, window/wall attenuation will be required along with alternate means of ventilation to allow for the maintenance of a closed-window condition.

Comment 16-3: The EIS needs to fully examine the implications and mitigations required as a result of the Site 5 noise (E) Designation. (TBTRA_055)

Response 16-3: As described in the Draft Scope of Work, the requirements of the Site 5 Noise (E) Designation will be described in the EIS.

Comment 16-4: An analysis of and mitigation plan for noise impacts of the adjacent FDR Drive on the proposed residential and open space uses, including playgrounds, should be prepared.

Mitigation for impacted neighbors should include the distribution and installation of double-or triple-paned windows, as well as air conditioners and filters. (TBTRA_055)

Response 16-4: As described in the Draft Scope of Work, noise levels at the proposed newly introduced open space will be determined and compared to *CEQR Technical Manual* noise exposure guidelines for open space. In the event that a significant adverse noise impact is identified at the newly introduced open space, mitigation options will be described and examined.

PUBLIC HEALTH

Comment 17-1: The scope and scale of the cumulative development proposed in this single block, as the direct result of three separate proposals, represents more growth in a 36-month period than the neighborhood has seen in 30 years. Three years means an entire term in middle school for a student or the remaining life expectancy of a senior. This will not just disturb their quality of life but could jeopardize health, safety, and ability to thrive. (Brewer_045)

What are the other health effects that will come out of this? (Zhang_C_042)

We are greatly alarmed and concerned about the potential impact this project will have on our safety and health. (Ramirez_022, Ramirez_056, Soto_066)

Response 17-1: According to the guidelines of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. As described in the Draft Scope of Work, if unmitigated significant adverse impacts are identified in any one of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for that specific technical area.

Comment 17-2: The DEIS must fully examine the potential mental health impacts relating to displacement, both the fear of and the actual displacement. (TBTRA_055)

Response 17-2: See response to Comment 17-1.

NEIGHBORHOOD CHARACTER

Comment 18-1: The EIS should include a study of the character of the neighborhood. (Benitez_068)

Neighborhood character must be addressed with extreme diligence. The impact on this category cannot be overstated. (LittleCherry_020)

Response 18-1: The EIS will include an assessment of the proposed projects' potential to result in significant adverse impacts on neighborhood character.

Comment 18-2: These proposed projects violate the intentions of the LSRD and the character of this neighborhood. (GOLES_Ngok_034)

Response 18-2: The EIS will consider the potential for the proposed projects to result in significant adverse impacts on neighborhood character.

Comment 18-3: Two Bridges' diversity and affordability give the neighborhood its character. Therefore, the project's impact on neighborhood character should focus on socioeconomic diversity and impacts on people of color, immigrants, and non-English speaking populations. The study area for Neighborhood Character, since it is so directly related to the residents, should follow the same study area described in the Land Use, Zoning and Public Policy section. (CB3_Rogers_005, TBTRA_055)

Response 18-3: An assessment of neighborhood character is generally needed when a proposed project has the potential to result in significant adverse impacts in socioeconomic conditions, open space, urban design and visual resources, shadows, traffic, and noise. If warranted, the neighborhood

character assessment would consider the effects of the proposed projects on socioeconomic conditions related to direct residential displacement, direct business displacement, indirect residential displacement, indirect business displacement, and effects on specific industries.

Comment 18-4: The current distribution of households by AMI should be disclosed. As should the distribution for the Future No Action alternative and the Future With Action alternative. The No Action household AMI distribution should be compared with that of the With Action alternative, in order that the difference discloses how the income mix of the neighborhood is expected to change under With Action conditions. Understanding how the action will impact the area's AMI levels is critical to understanding change in neighborhood character. (CB3_Rogers_005, TBTRA_055)

As with AMIs, Neighborhood Character should also analyze the existing mix of affordable versus market-rate housing units in the study area and how that mix will change under both the No Action and the With Action alternative. (CB3_Rogers_005)

Response 18-4: The EIS will identify the defining features of neighborhood character. As warranted, the affordability of housing in the study area would be included in the assessment of neighborhood character. Income levels are assessed in the socioeconomic analysis; changes to socioeconomic levels would be considered in the neighborhood character analysis.

Comment 18-5: The Two Bridges neighborhood character will change with these developments. The heights of these structures are overwhelming us. They're absolutely out of proportion, with no regard to the surrounding area. (LEOTA_009, LEOTA_Echevarria_078, Shelton_051, TBTRA_055)

Response 18-5: The height and bulk of the proposed projects would be considered in the urban design assessment. To the extent urban design is identified as a defining feature of neighborhood character, these aspects would be assessed within the neighborhood character analysis.

Comment 18-6: Neighborhood character is directly tied to its socioeconomic character. Unfortunately, with the upper economic class, an inherent sense of entitlement is prevalent. That's why there are affordable buildings. Or, as in Extell's case, the millionaires moving in will happily be completely isolated from the working class. (LEOTA_009, LEOTA_Echevarria_078)

Response 18-6: Comment noted. Under *CEQR Technical Manual* methodology and guidelines, the socioeconomic conditions of an area are defined as a factor that contributes to neighborhood character. The neighborhood

character assessment contained in the EIS will consider the potential for the proposed projects to result in a significant adverse impact on neighborhood character relative to socioeconomic conditions.

Comment 18-7: Consider the context of Chinatown. The Draft Scope of Work does not consider the development sites to be part of the wider Chinatown community. It only aggregates individual blocks within a ¼ radius, a narrow technocratic approach. It should extend the area of analysis to at least ½ mile, and in some cases beyond that (e.g., flood and socioeconomic analyses). The environmental review proposed in the draft scope would not examine the economic and cultural ties that bind the community together and the historic discrimination that the neighborhood has faced (for example, the neglect of Chinatown after 9/11). The analysis of indirect displacement cannot be simply a numbers game. The analysis must go beyond any racially cleansed “Neighborhood Character” analysis or patronizing view of Chinatown as a unique tourist destination. Displacement impacts must be analyzed in the context of the history of discrimination and segregation faced by Chinatown, including by the city’s land use policies. The same holds for the impacts on public housing and locally owned businesses. (Angotti_011, Angotti_071)

Response 18-7: A study area—which aims to capture the area of potential environmental effects—varies depending upon the technical area of study and the scale of the project. All study area delineations will follow *CEQR Technical Manual* guidelines. The Socioeconomic Conditions assessment is expected to utilize a study area that approximates a ½-mile radius of the Two Bridges LSRD boundary. The assessment will consider sub-areas within the larger radius if appropriate and in keeping with *CEQR Technical Manual* guidelines. The EIS analyses will consider historic neighborhood trends and whether potential displacement would be consistent with land use policies. However, race and ethnicity are not factors utilized for CEQR assessment.

Comment 18-8: It is impossible to reach the conclusion that this will not change the neighborhood character. Something has to be done to look at the process of neighborhood character in a way that’s really going to get to the displacement that we’re going to see for this project to go through. (Kaplan_030)

Response 18-8: Under *CEQR Technical Manual* methodology and guidelines, the socioeconomic conditions of an area are a factor that contributes to neighborhood character.

Comment 18-9: Luxury towers do not fit the character of our community. (LETTA_Castro-Negron_073)

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- Response 18-9:** See response to Comment 18-8.
- Comment 18-10:** The Two Bridges neighborhood has been a working neighborhood, affordable and ethnically diverse section of New York. Many of the residents, both short and long term, have cited the family atmosphere as the reason they move and stay here. Its character will change with these developments. (LEOTA_Echevarria_078)
- Response 18-10:** An assessment of the proposed projects’ potential to result in a significant adverse impact on neighborhood character will be included in the EIS.
- Comment 18-11:** The negative impact associated with the development of three massive towers along the East River waterfront cannot be ignored. Reductions of views to and from the East River will actively erode this neighborhood’s character. Additionally, the proposed built form of the three buildings makes no attempt to maintain a certain character. The proposals make no effort to build in context or with the neighborhood in mind. (LittleCherry_020)
- Response 18-11:** Under *CEQR Technical Manual* methodology and guidelines, the urban design characteristics of an area are defined as a factor that may contribute to neighborhood character. The potential for the proposed projects to result in a significant adverse impact on neighborhood character related to urban design will be assessed in the EIS.
- Comment 18-12:** Neither the height nor the design of the proposed towers is in keeping with the Community fabric and character of the Lower East Side. The size and height are inappropriate for the neighborhood. (Ramirez_022, Ramirez_056)
- Response 18-12:** The potential for the proposed actions to result in significant adverse impacts on neighborhood character will be considered in the EIS.
- Comment 18-13:** Lives were invested in this neighborhood. For the people who will be living in these future “units,” their investment will be in their square-footage apartments – until their family units grow and they will need to find larger spaces, thereby moving out for the next set of buyers to replace them. It is a rather dispassionate trend in the name of progress and profit. It is also in stark contrast to the deep-rooted residents who have contributed to a cultural dynamic that is both unique and defining to the culture of Two Bridges. In this new context, rather than having a tight-knit community, revolving neighbors will never truly take root, and a sort of Dust Bowl Effect begins to occur. (Pang_023)
- Response 18-13:** The EIS will include as assessment of the proposed projects’ potential to result in significant adverse impacts associated with neighborhood

character, which will consider the effects of socioeconomic conditions as it relates to neighborhood character.

Comment 18-14: LESPP advocates for new development of or enlargements to the existing buildings or other structures of both similar scale and design, those that will not seriously alter the scenic amenity and environmental quality. (LESPP_013, LESPP_Jones_047)

Response 18-14: Comment noted.

CONSTRUCTION

Comment 19-1: Construction of the Extell project, as a whole, caused residents in adjacent structures hardships. Temporary impacts don't feel transient when many new buildings are being constructed. Experience has shown that short-term construction impacts are not actually short-term. When they encompass the majority of the school year, a student's quality of life is not a quick-fix when long, overdue facilities upgrades remain unsolved, and then overcrowding will exacerbate everything. The DEIS should disclose all of these impacts. (Brewer_004, Brewer_045, Zhang_C_042)

Response 19-1: The EIS will follow *CEQR Technical Manual* guidelines in assessing the potential for significant adverse construction impacts. As described in the Draft Scope of Work and consistent with *CEQR Technical Manual* methodology, the construction impact assessment will evaluate the duration and severity of the disruption from the proposed projects' construction activities. Technical areas to be assessed will include transportation systems, air quality, noise and vibration, historic and cultural resources, hazardous materials, open space, socioeconomic conditions, community facilities, and land use and neighborhood character.

Comment 19-2: The construction of the proposed tower would severely affect the leased premises during the period of construction and then once built impede the future commercial businesses located there. It is not even clear whether it is possible to construct the cantilever building while maintaining the permitted commercial space in the ground lease. (LittleCherry_020)

Response 19-2: The construction analysis in the EIS will address potential effects on access to local businesses during construction. Access to nearby businesses is expected to be maintained throughout the construction period. Access to 235 Cherry Street will be maintained for current and future uses during the construction of the proposed Site 4 (4A/4B) project, as well as in the future with proposed projects operational condition.

Comment 19-3: I am concerned about the noise and pollution from construction. There have been various times where construction has started before the legal time of 7 AM and even on the weekends when they did not have an after-hours variance. Construction during valid work hours has been loud from the beeping and banging of machinery and vehicles. There also have been dumpster trucks that come too early in the morning to change construction-related dumpsters. I have endured many sleepless days and nights from the incessant construction noise at 275 South St. The simultaneous excavation and construction of three high rises within a two block radius means three times the noise and pollution. It will be catastrophically loud and devastating to our environment so mitigations need to be implemented to the highest degree. The mitigations that these developers have suggested are not sufficient. The developers need to enforce sound proofing to the windows of existing buildings and provide air purifiers to all residents that are affected by these impending projects. (Moy_021)

The noise, dust and air quality problems that will be generated and created when adjacent construction begins is unimaginable. Not only will we be faced with the fear of construction and its potential effect on the structure of our building but we will be forced to live with constant construction dust, pounding, vibrations and noise only feet away from our bedroom and living room window. These conditions will undoubtedly create a breathing and health nightmare. (Ramirez_022, Ramirez_056)

The amount of debris and dust and garbage and vermin that these projects bring to our neighborhoods is concerning. (Reyes_070)

Construction activity is a major source of pollution; air pollution is a major threat to public health, especially when major construction of such magnitude is coming to our neighborhood for more than three years. We need a specific measure to be taken to mitigate this risk. Dust must be controlled because it's a significant risk factor for a number of health conditions, like asthma, difficulty breathing, wheezing, coughing, respiratory, cardiac condition, stroke and lung cancer. To have a quality for air we need for the construction site to implement dust prevention. (Aroyon_039)

Response 19-3: The EIS will assess the proposed projects' construction-related activities and their potential for impacts on air quality, with a comparison against air quality standards which were established to be protective of human health. A quantitative construction noise analysis also will be prepared to examine potential noise impacts due the proposed projects' construction-related activities. The construction assessment will identify strategies and best management practices to minimize the construction effects of the proposed projects on the nearby community, including measures to

reduce project related air pollutant and noise emissions, as well as a pest management program to reduce the presence of rodents.

Comment 19-4: The northeast corner of South and Clinton Streets is home to an existing one-story City-owned building structure which maintains and operates the NYC Water Tunnel #1 which dates back 100 years. We question whether the proposed construction would not in fact be potentially disruptive to the operations of this water tunnel given the extent of excavation and drilling which has to occur in such close proximity to this century old structure and the naturally wet topography of the area. Will construction undermine the water pipes and water pumping system/station located at this site? Does it present a safety risk for all those potentially affected by this service? The effects of construction of the proposed buildings on this structure and the tunnels below are issues we believe need to be closely examined and determined. (Ramirez_022, Ramirez_056)

Response 19-4: The Site 6A applicant has researched available resources to locate information about the tunnel and its shaft and is in communication with DEP regarding the proposed construction in proximity to the water tunnel. In coordination with DEP, the building will be designed and constructed to ensure that it will not affect the tunnel, its shaft or related structures and utilities.

Comment 19-5: 257 Clinton Street (aka 275 South Street) is now over 40 years old and is the only modular building of its kind built in Manhattan during the 1970s. Many longtime residents in the building and I are concerned about the integrity of the building and its ability to withstand the deep excavation, heavy drilling, pounding, constant construction and vibrations that will be generated in order to construct adjacent to 257 Clinton Street (aka 275 South Street). A detailed assessment of whether 257 Clinton Street (aka 275 Clinton Street) is structurally sound and able to withstand and endure all the major construction activity that is proposed directly adjacent to this structure is required. (Ramirez_022)

Response 19-5: As discussed in the Draft Scope of Work, a construction vibration assessment will be performed to determine critical distances at which various pieces of equipment may cause damage or annoyance to nearby buildings based on the type of equipment, the building construction, and applicable vibration level criteria. Should it be necessary for certain construction equipment to be located closer to a building than its critical distance, measures to reduce the potential effects of vibrations will be proposed. All New York City Department of Buildings safety requirements and protocols must be followed, and construction of the

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proposed projects would be undertaken so as to ensure the safety of the community and nearby residents, including those at 275 South Street.

Comment 19-6: The work required on the Rutgers tube is due to Superstorm Sandy. We know how devastating that was to Two Bridges, and the neighborhoods are still recovering. These projects should go to great lengths to avoid any duplicate efforts while coordinating construction and resiliency within the area. (Brewer_045)

Response 19-6: Comment noted.

Comment 19-7: Construction vehicles working on Extell's site often make illegal K turns or block off traffic. Examine the impact of more construction vehicle traffic on this strained area. (TBTTA_Mak_012)

Response 19-7: As part of the proposed projects' construction planning, Maintenance and Protection of Traffic (MPT) plans would be developed. Approval of these plans and implementation of the closures would be coordinated with NYCDOT's Office of Construction Mitigation and Coordination. The construction assessment will identify strategies and best management practices to minimize the construction effects of the proposed projects on the nearby communities.

Comment 19-8: There are construction vehicles which often line South Street in the morning and during the night for construction of the Extell development at 250 South Street. How would additional construction vehicles, traffic and cranes possibly be accommodated on South Street given its current use as overflow for FDR traffic, Sanitation, EMS, NYFD, NYC Sanitation, Pier 36 events and Cruise Service, MTA commuter and private commercial buses? South Street at different times of the day is gridlocked with traffic making it difficult for even Sanitation and NYFD to have unobstructed and free access into and out of Pier 35. South Street will be unable to accommodate the additional traffic and vehicles associated with building yet another 4 Towers. Contingency for operating and delivering materials during the off hours and late night hours is extremely disruptive to the tenants who live in the area and unacceptable. South Street simply is unable to bear the additional heavy construction traffic given current congestion, traffic patterns and use. The area is already congested with traffic from the FDR and commercial traffic from the neighborhood and commercial vehicles parked on South Street. Emergency vehicles, Sanitation vehicles, NYFD and MTA commuter and private buses cannot be accommodated. (Ramirez_022, Ramirez_056)

Response 19-8: Extell's One Manhattan Square development is anticipated to be completed in 2019. Even if the buildings are not fully complete at that

time, heavy construction at that site would be complete by the time the proposed projects begin construction. Hence, there would be minimal construction overlap, if at all, with that project. As stated in the Draft Scope of Work, the EIS will assess the proposed projects' potential impacts during construction, including the potential traffic impacts, develop impact avoidance and mitigation measures where required and practicable, and identify construction activity restrictions that are subject to NYC laws and codes. It should also be noted that as part of the East River Esplanade project to enhance waterfront access and amenities, the City has been undertaking traffic calming and complete street improvements along South Street to transform it into a multi-modal and bike/pedestrian-friendly facility, which would deter motorists from using South Street as an alternative to the FDR Drive.

Comment 19-9: Parking and deliveries for commercial businesses and construction sites are a great concern as well. Work on the Extell site has crippled the surrounding streets during construction and made sidewalks dangerous for people. Mitigation would include a coordinated plan for trash pick-up and deliveries, partial street closures for construction with consistent and regular updates to the community, and a point person from each development to coordinate with the community over quality of life issues. And none of this should spill over to the weekends. With this much construction, no after-hour variances should be granted in order to provide a reprieve to existing residents, and the construction timelines need to reflect that. (Brewer_004, Brewer_045)

Response 19-9: As described in the Draft Scope of Work and consistent with *CEQR Technical Manual* methodology, the construction impact assessment will consider the effects of the proposed projects' construction on transportation services (i.e., transit and pedestrian circulation) and identify the increase in vehicle trips from construction workers and equipment. The parking demand associated with construction workers will also be considered.

The construction assessment will identify strategies and best management practices to minimize the construction effects of the proposed projects on the nearby community.

Permissible construction hours in accordance with New York City laws and regulations are from 7AM to 6 PM on weekdays. Appropriate work permits from DOB would be obtained for any necessary work outside of normal construction and no work outside of normal construction hours would be performed unless such permits are obtained.

Comment 19-10: TBTHC is concerned about structural and physical damage to our building as a result of construction of the proposed projects; air pollution

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during and post-construction; health effects from prolonged exposure to dust, debris, and other chemical products from construction; noise pollution; increased congestion from commercial vehicles and foot traffic already in the neighborhood and the addition of construction vehicles and workers; and physical safety (e.g., loose object and machinery falling, limited visibility from scaffolding, increase of crime in construction areas). Potential noise impacts and construction schedule should be disclosed as part of the EIS. The playground at the corner of Clinton and Cherry Streets needs to be protected during construction. (TBTHC_053)

Response 19-10: The EIS will follow *CEQR Technical Manual* methodology regarding the analyses of construction impacts, which include the assessment of transportation, air quality, noise, and vibration. The construction assessment will also describe the likely construction schedule and logistics for each project and identify measures that would be employed to ensure public safety during the construction of the proposed projects. The EIS will include a detailed air quality analysis that addresses potential impacts from the proposed projects, post-construction.

Comment 19-11: The impact of contaminated runoff during excavation on the East River should be assessed. (TBTRA_055)

Response 19-11: Stormwater pollution prevention measures will be implemented, per applicable regulatory requirements, during construction, such as reducing areas of open excavation, covering any contaminated soil stockpiles (it is anticipated most if not all contaminated soils will be excavated and loaded directly into trucks for off-site disposal), and protecting catch basins and other storm water inlets. Groundwater recovered during any dewatering activities will be treated in accordance with DEP or DEC requirements, as appropriate, prior to discharge.

80 RUTGERS SLIP, SENIORS

Comment 19-12: I do not support weekend and evening work in a residential area when there is construction. That is not something that a permit should be granted for unless it's a real emergency. (Brewer_045)

Response 19-12: Permissible construction hours in accordance with New York City laws and regulations are from 7AM to 6 PM on weekdays. Appropriate work permits from DOB would be obtained for any necessary work outside of normal construction and no work outside of normal construction hours would be performed unless such permits are obtained.

AIR QUALITY

Comment 19-13: An air quality baseline survey must be done of all criteria pollutants (not just CO and PM) throughout the project sites with monitors placed at

street level. Monitors must remain in place during construction, monitored daily, and reported weekly to the community in an accessible way. (TBTRA_055)

Response 19-13: The EIS will assess the proposed projects' construction-related activities and their potential impacts on air quality in accordance with *CEQR Technical Manual* guidelines and compare them against air quality standards, which were established to be protective of human health. Based on the results of the construction air quality analysis, if necessary, the feasibility, practicability, and effectiveness of implementing measures to mitigate significant construction air quality impacts will be examined. Air monitoring and community reporting would be considered if found suitable to address an identified impact.

NOISE

Comment 19-14: The EIS should include an analysis of construction noise impacts on commercial, residential, and open space uses. (TBTRA_055)

Response 19-14: As described in the Draft Scope of Work, during the most representative worst-case time periods, noise levels due to construction of the proposed projects will be predicted for each sensitive receptor. In accordance with the *CEQR Technical Manual*, a noise-sensitive receptor is "usually defined as an area where human activity may be adversely affected when noise levels exceed predefined thresholds of acceptability or when noise levels increase by an amount exceeding predefined thresholds of changes." Examples of noise-sensitive receptor locations include residences, schools, and parks.

ALTERNATIVES

Comment 20-1: I strongly believe that there must be a more common sense alternative for these out-of-scale towers that would more properly fit the context of the neighborhood. Given the survey responses, this is a shared sentiment with the community. Major reasonable alternatives to the proposals would include more affordable units at deeper affordability, more public space, and lower building heights and bulk more appropriate to the current building landscape in order to preserve light and air. (Brewer_004, Brewer_045)

Response 20-1: Alternatives will be developed to respond to identified significant adverse impacts, including No Action and No Unmitigated Significant Adverse Impact Alternatives. An alternative that provides more affordable units would not be anticipated to address any significant adverse impacts identified for the proposed projects.

Comment 20-2: In addition to the No Action alternative, the DEIS should study the following alternatives:

- An alternative that examines the project that accounts for all currently approved amendments to the LSRD Plan that have not yet been built. (CB3_Rogers_005)
- A lesser density/lower-scale alternative that adds additional housing and affordable housing above the no action alternative, but which is more in scale with the surrounding neighborhood. The Chinatown Working Group Plan has widespread support throughout the community, and includes a specific provision for the Two Bridges Area Subdistrict D: A height limit of 350 feet; an anti-harassment and anti-demolition certification would guarantee at least 50 percent affordable housing be new development at local AMI; climate change resilience, architecture, landscape and open space features to accommodate sea level rise and water detention, including green infrastructure and retention tanks. (Angotti_011, Benitez_068, CAAAV_Dang_33, CB3_Rogers_005, CB3_Rogers_044, GOLES_Ngok_034, Kaplan_048, LESPP_Jones_047, LESPP_Jones_072, LESON_Queylin_080, LESON_Shen_077, LESON_Tieu_036, Marte_027, Ning_082, Shelton_051, TBTF_052, TBTRA_055, TBTTA_Mak_012)
- An alternative design that does not add unnecessary and unwarranted height. For example, the building proposed on site 4A/B is proposed for 1,008 feet to the top of the mechanicals. This height includes 15 floors of mechanical spaces and voids that add 324 feet to the building height and which, presumably, do not count against zoning floor area. While ample mechanical spaces make for good buildings, devoting nearly 1/3 of the building's height to mechanical spaces is extraordinary and introduces bulk to the neighborhood which provides only impacts and no benefits. The Lead Agency should instruct the applicant to study an alternative that minimizes the use of mechanical spaces to introduce unwarranted height. (CB3_Rogers_005, CB3_Rogers_044, TBTTA_Mak_012)
- The DEIS should study a No Unmitigated Impact alternative. This may result in an alternative that is more like the Chinatown Working Group alternative, but its purpose would be to demonstrate the changes that would have to be taken to eliminate all of the project's unmitigated impacts. (Benitez_010, CB3_Rogers_005, CB3_Rogers_044)
- The EIS should also include DCP-developed options for compatible uses of the target open space that is in keeping with required benefit to the residents and City as a whole. These can include development of a much-needed electrical vehicle charging station on Site 5 for use by the growing fleet of electric vehicles or standalone grocery and other food market options that alleviate food desert issues for Two Bridges without compromising the current air, light, density, and

- character features integral to the residential community. (LESON_007, LESON_054, TBTRA_055)
- Response 20-2:** At a minimum, the EIS will include a No Action and a No Unmitigated Significant Adverse Impact Alternative. See response to Comment 20-1.
- Comment 20-3:** Under SEQRA requirements, the areas of analysis have to meet state law; they also must include alternatives, and you published the scope with none. So it's important to include alternatives, specifically those that would meet community zoning preferences, like maximum heights of no more than twenty or thirty stories. (LESON_Koetz_064)
- Legally an EIS must contain the evaluation of alternatives to the proposed action that include a range of reasonable alternatives that are feasible, considering the objectives and capabilities of the project sponsor. The current scope fails to meet this legal requirement, and therefore, reasonable alternatives must be added. (LESON_Queylin_080, Ning_082)
- Response 20-3:** The Draft Scope of Work describes the alternatives for inclusion in the EIS on pages 37 and 38. See response to Comment 20-1.
- Comment 20-4:** The draft scope of work should include alternative development options consistent with zoning, density, and neighborhood recognition provisions laid out in the Chinatown Working Group Rezoning Plan. (LESON_Queylin_080, Ning_082)
- Response 20-4:** Comment noted. See responses to Comments 20-1 and 20-3.
- Comment 20-5:** Alternatives for the redevelopment of Site 4 exist and must be considered in the EIS. Less impactful developments have been proposed and must be reviewed. CB 3 has alternatives that must be examined. (LittleCherry_020)
- Response 20-5:** See response to Comment 20-1.
- Comment 20-6:** The scope was supposed to address alternative uses and environmental factors like air quality, shadows, and impact on the character of the neighborhood. None of this is addressed. Indeed, less intrusive developments have been proposed for Site 4. (LittleCherry_Stern_061)
- Response 20-6:** At a minimum, the EIS will include a No Action and a No Unmitigated Significant Adverse Impact Alternative. See response to Comment 20-1. As noted in the Draft Scope of Work, the EIS will include assessments of the potential for significant adverse impacts to Air Quality, Shadows, and Neighborhood Character.

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- Comment 20-7:** Little Cherry LLC, the ground tenant at 247 Cherry Street, had previously developed plans in concert with Two Bridges and Settlement Housing for a tower which would be almost half the size of the JDS mega-tower, with a free-standing school building below. This plan is consistent with the public taking which carefully defined the intent of the January 1961 Two Bridges Urban Renewal Plan, which is still in effect today at this site. A plan such as this should be considered as a “reasonable alternative” to the JDS Development’s proposed tower for the purposes of this Scoping Hearing. (Kramer_024)
- Response 20-7:** A lesser density alternative will be considered in the EIS, as well as a No Unmitigated Significant Adverse Impacts Alternative. The Two Bridges Urban Renewal Plan expired in June 2007.
- Comment 20-8:** We strongly oppose this proposal unless the City generates a development plan that reflects true community input and adheres to a comprehensive plan. The City must pursue a decidedly more sustainable approach to better accommodate the new population by providing an affordable housing program that reflects the income of the area; adopting a carefully considered design that addresses climate change and resiliency for the long-term; requiring the achievement of LEED™ or equivalent certification standards for construction and operation; incorporating height and bulk measures that reduce shadow impacts on parks and open space; and including a vibrant mix of uses, especially with regard to local retail and community facilities. (MAS_Negret_016)
- Response 20-8:** The EIS must consider the projects currently being proposed. The proposed projects will include local retail and community facility uses, provide affordable housing and address resiliency concerns. Mitigation measures will be identified for any impacts identified for the proposed projects.
- Comment 20-9:** LESPP advocates for consideration and analysis of this portion of the Plan [Neighborhood Character] for Chinatown and Surrounding Areas in the EIS. LESPP believes these three issues do have an impact on the environment. LESPP believes that new housing construction at rents that will substantially alter the present mix of income groups will impact the environment. LESPP believes that new development that doesn’t relate to the existing buildings in scale and design and alters the scenic amenity and environmental quality does impact the neighborhood. LESPP believes that developments that do not maximize climate change resilience will impact the environment. LESPP believes that these statements consider the impact of any new developments in any community. LESPP believes that these issues will have an impact on the

Two Bridges Project environment and should be addressed in the EIS. (LESPP_013)

Response 20-9: Comment noted.

GROWTH-INDUCING ASPECTS OF THE PROPOSED PROJECTS

Comment 21-1: This section should include more detail, especially in the identification of sites such as the Edison Storage and other soft sites—see Chinatown Working Group study identification of soft sites in the larger study area that would be more likely to respond to increased market values and to propose larger and/or more expensive rent or ownership developments. In addition, the influx of such a large number of residents with higher incomes will increase the demand for additional higher priced products and services. (TBTRA_055)

Response 21-1: The Growth-Inducing assessment will consider the proposed projects' potential effects on market conditions and whether the projects could be expected to induce additional development. The study referenced by the commenter will be considered as a potential source for the analysis.

NATURAL RESOURCES

Comment 22-1: The impact of the proposed projects on the migratory patterns of birds that are attracted to the light of tall buildings should be analyzed in coordination with the New York City Audubon Society's *Bird Safe Buildings* guidelines. (TBTRA_055)

Response 22-1: As noted in the Draft Scope of Work, the Natural Resources analysis will consider the potential for bird strikes in the future with the proposed projects.

Comment 22-2: Include an expanded study area (CEQR recommendation = ½ mile) to include adjacent portion of East River in natural resources analysis framework. This will ensure aquatic resources are accounted for in historic, existing and future conditions analysis. (TBTRA_0055)

Response 22-2: The natural resources analysis will consider potential impacts on the East River.

GENERAL COMMENTS

Comment G-1: Since these developments were announced, the Lower East Side community, including CB 3 and its residents, has raised many questions regarding this plan at multiple community meetings on these developments, and residents have voiced their opposition to this plan. We are here because of this and ask the City to limit scale and require improving whenever possible. (Niou_025, Squadron_026)

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- Response G-1:** Comment noted.
- Comment G-2:** Our community has been given a lot of information, translation, timely information. The purpose of the extension for this process was due to translation. Our residents did not receive any of that information. Why? Because we have a lack of funds as resident leaders. That was the responsibility of the elected officials and DCP to do that job yourselves. (LETTA_Castro-Negron_073)
- Response G-2:** DCP has provided Spanish, Cantonese, and Mandarin translations of the Scoping Notice on its website at <https://www1.nyc.gov/site/planning/applicants/scoping-documents.page>. Spanish, Cantonese and Mandarin translations of the project description portion of the Draft Scope of Work are available on the projects' website at <http://www.twobridgeseis.com/environmental-review>, which has been publicized. Spanish, Cantonese, and Mandarin translations of additional EIS materials will be made available at the same time as the English language EIS materials.
- Comment G-3:** Considering the new Extell building that already towers over the Manhattan Bridge, and what our stretch of the waterfront would look like with these five new towers, I'm frankly concerned about the Two Bridges community becoming a new soft target for terrorism. I don't know where this belongs in your technical areas of study, but I think it's something that requires some kind of security assessment. (LEOTA_Richardson_081)
- Response G-3:** Terrorism and security are not part of environmental assessment under CEQR.
- Comment G-4:** The ground lessee for Lot 76 (on Site 4) is a "party-in-interest"—certified as such in 2008 in a recorded document when the existing zoning lot was formed)—such that any further expansion of the zoning lot requires its consent (and that of its mortgagee), as dictated by the ZR. The location of the proposed JDS tower, Site 4, requires the merger of tax lots 15, 70 and 76; Little Cherry LLC's approval is required to merge those tax lots, and Little Cherry refused. The Site 4 building cannot be built. (LittleCherry_020, LittleCherry_Schmidt_063, LittleCherry_Spindler_062, LittleCherry_Stern_061)
- Response G-4:** This is not a comment on the Draft Scope of Work.
- Comment G-5:** The scope claims that it will improve open space in the area. Yet, Little Cherry has clear prior rights to the open space, pursuant to its ground lease. JDS has included the open space from Site 4. But how can they do

that when Little Cherry must consent? This is yet another misrepresentation. There has been no consent. (LittleCherry_Stern_061)

Response G-5: This comment reflects the commentator’s legal opinion concerning a lease agreement and is not a comment on the Draft Scope of Work.

Comment G-6: There is a Ground Lease on Lot 76 where Little Cherry LLC is the Ground Tenant. Under that Ground Lease, the Tenant is given dominion and control over, and responsibility to take care of, the Lot 76 open space. There is no indication as how the open space on Lot 76 can possibly be “improved,” or altered, since Little Cherry already controls that space on Lot 76 and Little Cherry’s prior consent would have to be obtained since it is already covered by its long term ground lease. The omission of that factor misleadingly just presumes a right to improve space. See table A-2 where open space for Site 4A/4B is reduced from 43,920 sf to 37,530 sf. No mitigation is proposed. (LittleCherry_020)

Response G-6: This comment reflects the commentator’s legal opinion concerning a lease agreement and is not a comment on the Draft Scope of Work.

MISCELLANEOUS

Comment G-7: The DEIS should examine the adverse impact of gentrification driven over policing will have on existing low-income communities of color, particularly the youth. (Benitez_068, Brewer_045, CB3_Rogers_005, CB3_Rogers_044, GOLES_Ngok_034)

Response G-7: Policing practices, race, and ethnicity are not part of environmental assessment under CEQR.

Comment G-8: LESPP also wrote advocating for a structured approach to outreach and recruitment of community residents for employment. LESPP would like the developers to sponsor residents for union positions. LESPP advocates that part of Workforce Development include a breakdown of how many people are hired from zips 10002, 10009 and 10038. We also request a breakdown of the job titles and date of hire of our residents. We would like this information sent to a designated worker in your office and shared with the community. LESPP advocates for the consideration and analysis of providing job opportunities for the residents of zip 10002. (LESPP_013, LESPP_Jones_047)

Response G-8: This is not a comment on the Draft Scope of Work.

Comment G-9: My comments reflect resiliency concerns of the scope. One of them is that in the shadows assessment you should also include an impact of the sun loss potential for future solar developments for buildings in the area.

As those—that could limit increased resiliency in the future. (GOLES_Pinada_041)

Response G-9: Any consideration of future solar developments would be speculative and is not considered in the EIS.

AFFORDABLE HOUSING

Comment G-10: The purpose defined in the scope is the mere development of 694 affordable units, and we don't know what that means. They have to be affordable to the neighborhood, residents in this neighborhood, and 25 percent is a miniscule percentage of what's needed for the inevitable displacement. (Kaplan_030, Kaplan_048)

The developers will provide 694 affordable units, for which they will receive ample public funds through tax incentives, but they will also bring 2,081 market-rate units in a neighborhood with the lowest AMI in Manhattan. (Kazi_067)

Response G-10: The development of 694 affordable units is a significant benefit to the residents of New York City. The affordability of the units would be based on Affordable Housing NY. The proposed projects would provide for permanent affordability.

Comment G-11: CB3 recognizes the value of the proposed 694 units of affordable housing. The project description needs to provide more detail regarding these units.

- Will they be permanently affordable?
- Will they all be on-site or may some be placed off-site?
- What AMIs will they serve? If this has not yet been determined, what are the possible AMIs that will be served and when will the decision be made regarding AMI levels?
- Will the affordable housing target a single AMI range or will there be several tiers of AMIs?
- How well do the targeted AMIs match with the community's current AMIs? Or in other words, will the affordable housing provided in the buildings match the community AMIs?
- Will the applicant get public subsidies for the provision of such affordable housing? Or in other words, will public subsidy support affordable housing in this building that could be used elsewhere in the community?
- Will the mix of unit sizes (and thereby average household size) reflect the community's unit size/household size distribution? (CB3_Rogers_005, TBTF_052, TBTRA_055)

The developers need to let us know what AMI percentage they are going to use. They keep using the word "affordable." Extell's million dollar condos are affordable for some people. And when they come to the Two

Bridges neighborhood, the area median income will forever be changed. Thereafter, when HUD determines the new AMI, it will truly no longer be affordable to us. (LEOTA_009, LEOTA_Gonzalez_079, TBTF_052, TBTRA_055)

Response G-11: It is expected that the affordable units will remain permanently affordable. However, the projects' levels of affordability have not been finalized. The applicants, in consultation with the HPD, as a supporting and regulatory agency, will establish levels of affordability for the proposed projects. The levels of affordability are based on percentages of the Area Median Income (AMI) for the region. While specific levels of affordability have not been determined, it is expected that there will be several tiers of AMI levels offered. It is anticipated that the projects' levels of affordability would be consistent with the updated 421-a Affordable New York Housing Program, known as Affordable Housing NY, under which 10 percent of rental housing could be available at 40 percent of AMI, 10 percent at 60 percent of AMI, and 5 percent at 120 percent of AMI.

The Socioeconomic Conditions chapter of the EIS will present the study area's median and average incomes, which will serve as a point of comparison to the region's AMI. The specific sizes of the affordable units have not yet been determined.

Comment G-12: There needs to be a better way to calculate the Average Median Income. Places like Westchester and Long Island should not factor in when discussing the Lower East Side. (Yo_043)

Response G-12: HUD calculates the median income for every metropolitan region in the country annually. HUD focuses on the region—rather than just the city or neighborhoods within a city—because families searching for housing are likely to look beyond the city itself to find a place to live.

Comment G-13: The area around the development site has several potential NYCHA infill sites. Earlier this month NYCHA announced a plan for infill development at LaGuardia Houses with 50 percent market rate and 50 percent affordable housing. If the proposed action changes the AMI mix of the neighborhood (see Neighborhood Character), might the proposed action change NYCHA infill policy? Agency should determine how NYCHA makes their infill policy decisions. Any new NYCHA sites that might be indirectly developed because of the action should be disclosed. (CB3_Rogers_005)

Response G-13: The NYCHA projects would proceed independently of these three projects. Therefore, NYCHA will make determinations about development and affordability on its sites independent from the proposed projects.

Appendix B: Response to Comments on the Draft Scope of Work

- Comment G-14:** Developers and consumers have a different perception about the word “affordable.” Take all salaries and pay scales into consideration when using the words “affordable housing.” (Thomas_037)
- Response G-14:** See responses to Comments G-11 and G-12 regarding the anticipated income levels that would qualify for affordable housing.
- Comment G-15:** This is not affordable housing. (Mobley_040)
- Response G-15:** As noted above, the affordable units are intended to meet the affordability guidelines of the Affordable Housing NY program.
- Comment G-16:** The Lower East Side Power Partnership (LESPP) advocates that a portion of the affordable housing consider the AMI of zip 10002 for income levels. LESPP advocates for affordable housing for service and municipal workers (i.e., fire fighters, nurses, police officers, sanitation workers, teachers) from entry to seniority positions. LESPP advocates for a portion of the affordable units being set aside for these middle-income households. In the 50-30-20 Mixed-Income Program “a minimum of 30 percent of units would be set aside for middle-income household.” We advocate for consideration of the rent and income levels for middle income households used by the 50-30-20 Mixed-Income Program administered by NYC Housing Development Corporation. (LESPP_013, LESPP_Jones_047, LESPP_Jones_072, TBTRA_055) We would like consideration in terms of affordable housing that there be something affordable for somewhat middle income folks, such as firefighters, nurses, police officers, sanitation workers, teachers, from entry to seniority. (LESPP_Jones_072)
- Response G-16:** Comment noted. While specific levels of affordability have not been determined, it is expected that there will be several tiers of affordability levels offered, including middle-income units. See also the response to Comment G-11.
- Comment G-17:** The magnitude of the proposed development is extremely disproportionate with the surrounding area and lacking in foresight. With over 2.5 million gsf of residential space, nearly 3,000 dwelling units, and almost 6,000 new residents in a low-income area, the development provides only 25 percent affordable dwelling units, approximately 11,000 sf of retail space, and 103 parking spaces. (MAS_Negret_016)
- Response G-17:** Comment noted. The proposed projects’ 694 affordable units would be greater than the number of affordable housing units provided under the applicable Inclusionary Housing program.
- Comment G-18:** The Lower East Side, particularly the Two Bridges area, already lacks enough affordable housing to meet the demand of the neighborhood. It is

critical that the City protect the current stock of affordable housing and secure additional affordable housing units. (Squadron_006)

This neighborhood is currently affordable. Even if the new developments were to have 75 percent affordable housing, that wouldn't mitigate the effects of the incoming luxury buildings. (Zhang_C_042)

Response G-18:

Comments noted. As detailed in the Draft Scope of Work, the Socioeconomic Conditions chapter of the EIS will assess the proposed projects' potential effects on residential market conditions in the study area. *

APPENDIX B

**Written Comments Received on the Draft Scope of Work
and
Transcript from the Public Scoping Meeting**



THE CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD 3

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Jamie Rogers, Board Chair

Susan Stetzer, District Manager

May 25, 2017

Robert Dobruskin, AICP
New York City Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271

RE: CB3 Comments on Draft Scope of Work for Two
Bridges LSRD

Dear Mr. Dobruskin,

The following details the comments of Community Board 3 ("CB3") on the Draft Scope of Work ("Scope") for the Draft Environmental Impact Statement ("DEIS") that will study the environmental impacts for the proposed amendments to the Two Bridges Large-Scale Residential Development Plan (LSRD).

Project description & purpose and need of the proposed action

The proposed project will introduce building forms to this neighborhood that are new to the District and contrary to local plans. These building forms were not considered possible, considering the Large-Scale Residential Development Plan that governs the area.

The project as described will introduce new building forms, informally referred to as "super-talls," to a district composed largely of medium density housing. While the underlying zoning allows such density, the right to build under those densities was removed with the adoption of the Large-Scale Residential Development Plan (LSRD) in 1972. The LSRD plan limited the development on the site to, generally, what can be seen there now: developments of between 3.5 and 4.9 FAR, with buildings ranging from one to 26 stories, surrounded by open space. The existing level of development is in-scale and in context with the surrounding development.

The primary governance of the use, mass and plan of this site is the LSRD, not the underlying zoning. Considering the scale of the change proposed, the determination that this action is a minor modification of the LSRD should not rest solely on the underlying zoning.

The amendment of the LSRD plan is not a minor modification. The CPC needs to better explain and justify its decision on how they reached their determination that the project is a minor modification. It should be done as quickly as possible before the Final Scope of Work or the DEIS are released.

On August 11, 2016, former Chair of the City Planning Commission Carl Weisbrod explained the CPC's decision to classify this action as a minor modification. This decision meant that the action avoided ULURP. In that letter, he agreed to perform an environmental review but he also justified the continued classification of the action as a minor modification by quoting Title 62, Section 2-06(g)(5)(ii) of the Rules of the City of New York regarding ULURP.

CB3 notes that these rules do not say that this project must be classified as a minor modification, only that it may be classified as a minor modification if the CPC so determines. One of the considerations the CPC must consider when making this determination is if the amendment, "increases the height, bulk, envelope or floor area . . . or alters conditions or major elements of the site plan." It is of great concern that the CPC saw the proposed changes to the site plan, read the Rules of the City of New York, and still found that these changes to the LSRD constituted a minor modification. CB3 has concerns about whether the CPC fully considered all conditions that the Rules of the City of New York instruct the CPC to follow when making this decision. For example, will the Lead Agency provide evidence that that it reviewed, "earlier hearings at the community board or Commission,"¹ as required by the Rules of the City of New York, by releasing transcripts and/or other materials that documented those earlier CPC and Community Board hearings?

The purpose and need for the proposed action needs to better justify the scale of the change.

CB3 recognizes the value of the proposed 694 units of affordable housing. The project description needs to provide more detail regarding these units.

- Will they be permanently affordable?
- Will they all be on-site or may some be placed off-site?
- What AMIs will they serve? If this has not yet been determined, what are the possible AMIs that will be served and when will the decision be made regarding AMI levels?
- Will the affordable housing target a single AMI range or will there be several tiers of AMIs?
- How well do the targeted AMIs match with the community's current AMIs? Or in other words, will the affordable housing provided in the buildings match the community AMIs?
- Will the applicant get public subsidies for the provision of such affordable housing? Or in other words, will public subsidy support affordable housing in this building that could be used elsewhere in the community?
- Will the mix of unit sizes (and thereby average household size) reflect the community's unit size/household size distribution?

Other than the development of new and affordable housing, provide additional explanation for the project need and justifications for the action.

¹ Title 62, Section 2-06(g)(5)(ii)(D)

Please better explain how the proposed development is consistent with the development goals of Two Bridges LSRD.

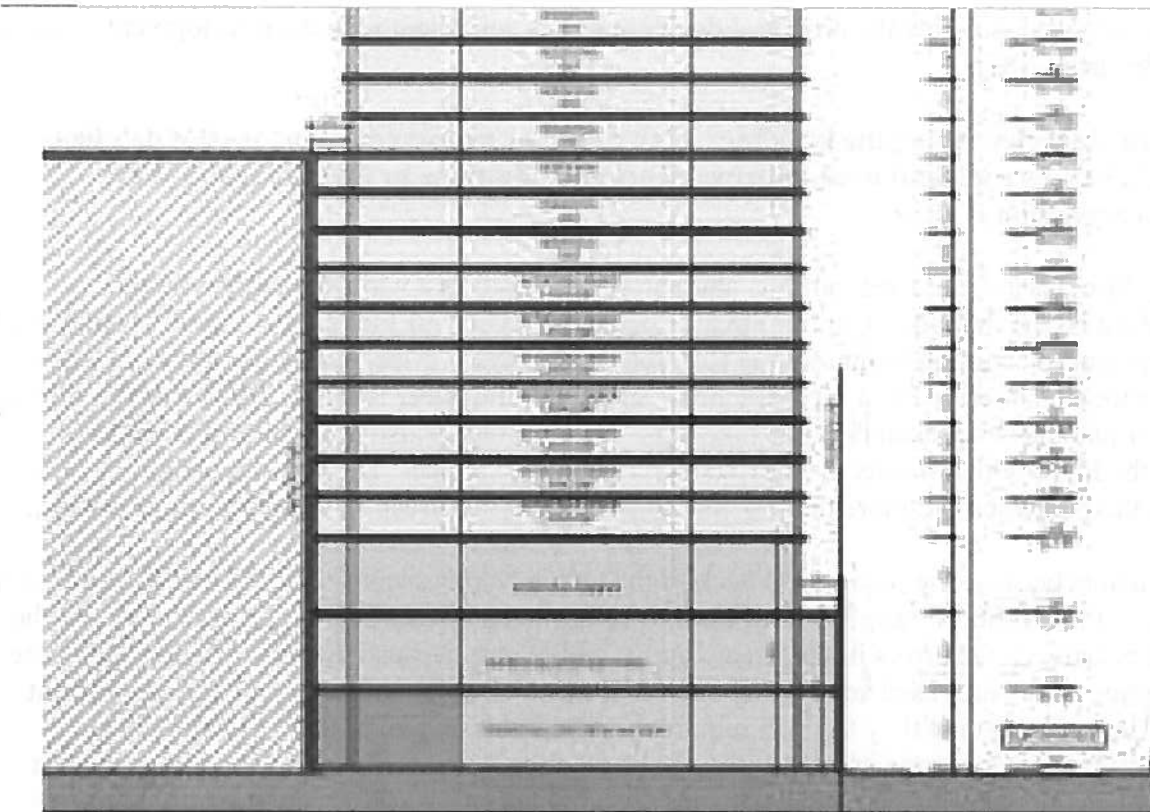
The drawings describing the buildings allowed by the proposed action are not detailed enough, have errors, and need improvements and additions so that the scope of the regulatory action is clear.

Cherry Street is a wide street, but it is alternately described as a wide and narrow street depending on the drawing. Clinton Street is described as an “80 foot narrow street,” which is not possible since according to the Zoning Resolution all streets 75 feet and wider are wide streets. South Street is described as a 70 foot narrow street, but it unclear if this is the size of the mapped street or just the street excluding the bike lane. South Street is also unusual as it is partially under the FDR, which results in two overlapping mapped streets. Do two overlapping mapped streets that, together, are more than 75 feet constitute a wide street for the purposes of zoning?

This matters because the required setback of the towers varies according to the width of the street on which they front. The street widths need to be accurately described on the drawings. Further, in part because of the errors in the street widths, and in part because there is missing data in the description of the proposed action, it is unclear if the developments are completely as-of-right under C6-4 zoning or if they too will require modifications under the LSRD to allow them to comply. **Table A of Appendix A** appears to be an attempt to show zoning compliance, but it fails by leaving out critical elements of zoning compliance (e.g. tower coverage), and answers are not consistent from site to site. This table should read: regulated element (e.g. yards, tower coverage, FAR, etc.), what is allowed in the district, what is proposed, and then if the project complies. This table appears to have been cobbled together from the different developers, each of which are using different standards, with no attempt to make it consistent or meaningful.

If the project is shown to require relief from some element of compliance with underlying C6-4 zoning under the amended LSRD, then there needs to be drawings demonstrating what element of the project will need relief under the LSRD. This will disclose to the Lead Agency and the public the magnitude of the change this LSRD requires from the existing underlying zoning.

Further, because information about the project comes from different developers, they all follow different standards in their drawings, produced at different resolutions, which makes them difficult to compare. For example, the following is a detail of the Site 6 Illustrative Section (Figure 12), which shows that the text on the drawing cannot be read, as reproduced below:



Drawings that include numbers and text that cannot be read need to be corrected. All drawings need to be legible and should follow the same standards so they can be more easily compared. For example, site six seems to have a much more reasonable use of mechanical space when compared with site 4A/B. However, it is difficult to say with certainty because the drawing is not legible and the drawings use different standards. The Lead Agency should select a standard and then instruct the individual developers to submit drawings that follow that single standard so that the scope of the project is clearly disclosed to the public.

Alternatives to the project as proposed

In addition to the No-Action alternative, the DEIS should study the following alternatives:

- An alternative that examines the project that accounts for all currently approved amendments to the LSRD Plan that have not yet been built.
- A lesser density / lower-scale alternative that adds additional housing and affordable housing above the no action alternative, but which is more in scale with the surrounding neighborhood. This alternative may be modeled after the plan for the area produced by the Chinatown Working Group (CWG) within Sub-District D.
- An alternative design that does not add unnecessary and unwarranted height. For example, the building proposed on site 4A/B is proposed for 1,008 feet to the top of the mechanicals. This height includes 15 floors of mechanical spaces and voids that add 324 feet to the building height and which, presumably, do not count against zoning floor area.

While ample mechanical spaces make for good buildings, devoting nearly 1/3 of the building's height to mechanical spaces is extraordinary and introduces bulk to the neighborhood which provides only impacts and no benefits. The Lead Agency should instruct the applicant to study an alternative that minimizes the use of mechanical spaces to introduce unwarranted height.

- Finally, the DEIS should study a No Unmitigated Impact alternative. This may result in an alternative that is more like the CWG alternative, but its purpose would be to demonstrate the changes that would have to be taken to eliminate all of the project's unmitigated impacts. While this alternative may not be feasible in relation to the project objectives, it will serve as a tool that demonstrates the magnitude of change to the project that would be necessary to eliminate impacts.

Land Use, Zoning, and Public Policy

Considering the size of the project, a quarter-mile study area is likely too small to capture all the indirect impacts, especially to the north and west. Because of project's location along the water, a uniform study area is not warranted, but should extend further inland than the ¼ mile proposed. As instructed in the CEQR Technical Manual, "the study area does not have to be regular in shape" and in this case shouldn't be: the study area should extend at least to Grand Street and then follow Bowery Street to Oliver Street to the shoreline. The size of such a study area will be similar to the ¼ mile radius proposed, but will cover neighborhoods likely to feel indirect impacts.

The list of projects expected to be built in the study area (No Action projects) should be cross-referenced with the soft-sites collected in the CWG plan to ensure that none are missed.

CB3 is aware of discussions between and among NYCHA and New York City about facilitating infill on public housing estates. The area around the development site has several potential NYCHA infill sites. Earlier this month NYCHA announced a plan for infill development at LaGuardia houses with 50% market rate and 50% affordable housing. If the proposed action changes the AMI mix of the neighborhood (see Neighborhood Character), might the proposed action change NYCHA infill policy? For instance, there is currently, just this one infill site proposed, but if AMIs in the area change, will NYCHA's infill policy regarding the number of development sites also change? Or will NYCHA's policy regarding the income mix of proposed units change? If the action is developed as planned, will NYCHA policy regarding infill building height/scale change because such large buildings are being introduced into the context? The Lead Agency should determine how NYCHA makes their infill policy decisions, and if they make any infill policy decisions considering neighborhood AMI or neighborhood built context, the impact of changing AMIs and built context should be projected onto NYCHA infill policy, and any new NYCHA sites that might be indirectly developed because of the action should be disclosed.

In addition to completing the Waterfront Revitalization Program (WRP) Consistency Assessment Form, the DEIS should include analysis of how the combined developments will adhere to the 44 policies (relevant to these developments) of the NYS Coastal Management Program, if the development shall receive any funding or financing from the State of NY as required by the NYS Coastal Management Program.

Socioeconomic conditions

Direct Residential Displacement

Disclose specific relocation plans for the residents of the ten units at 80 Rutgers Slip, including how relocation costs will be addressed for those residents, the duration of time they will be relocated, where they will be housed and under what conditions, and what costs will be incurred and by whom.

Indirect Residential Displacement

The method described in the CEQR Technical Manual for assessing indirect residential displacement is wholly inadequate for this area, as it assumes that all older larger buildings have tenants that are rent protected and insulated from increases in rent due to changes in market-rate rent. With the erosions of rent stabilized units in recent years, this assumption is clearly not true. To properly do this analysis, it will be critical to determine the number of units that are market-rate rentals, which will require collecting data on rent stabilized units by building. These data are available from the New York State Department of Homes and Community Renewal, HPD, and/or NYC Dept. of Finance. The DEIS should use these sources (not the Census Bureau) to obtain data. Simply, any method of indirect displacement that does not attempt to get a real count and understanding of market conditions in mixed market/stabilized buildings will likely understate the impact because the base data are wrong.

Further, it is no longer safe to assume that just because a unit is regulated that the residents are immune from indirect displacement. The DEIS should examine the potential of the action to accelerate the trend of changing socioeconomic conditions that will potentially displace vulnerable populations regardless of the regulated status of their unit. In addition to data from the Census and RPAD, and current real estate market data, this analysis should include data that correlate with actual displacement. These sources should include eviction and foreclosure data for the past five years, building and alteration permits, demolition permits, complaints of landlord harassment, an inventory of currently regulated building stock that will soon expire, all subsidized, rent regulated and or stabilized apartments, an inventory of local requests for Right to Counsel, and interviews with local housing groups that counsel tenants who have been subject to harassment, discrimination, and displacement.

Because of the size of this project and the number of market rate units, the study area should at least match the study area described in the Land Use, Zoning, and Public Policy section.

Indirect displacement should also attempt to identify the people who are most at risk: especially those who do not speak English as a first language, so a mitigation program can be developed that is able to reach those most in need.

The Lead Agency should consider anti-harassment measures to help protect those in rent stabilized units and if significant impacts are shown, direct HPD to help mitigate those impacts by developing a Housing Plan, like those written for East New York and East Harlem, that targets buildings and tenants in the area for increased availability of funding for both new and existing regulated buildings in the area.

Indirect Business Displacement

For Indirect Business Displacement, the Scope of Work focuses on businesses that are, “essential to the local economy.” Residents of this area are often linguistically isolated and there are many local businesses that specifically service the needs of these linguistically isolated populations. Displacement of businesses that provide goods and services to non-English language speakers is the displacement of businesses that are, “essential to the local economy” since if these establishments are displaced, residents will lose essential services. Consequently, when determining which businesses are “essential to the local economy,” the DEIS should study not only the size of the business, but the populations that they serve and the choices those populations have if these businesses were to be displaced.

In addition to public data sets, the economic development section of the CWG Plan, as well as the Asian American Legal Defense and Education Fund study both contain essential information on this topic, which should be used by the Lead Agency when evaluating indirect business displacement. Further, data from indirect residential displacement should be used to determine how shifts in shopping patterns due to neighborhood income change would impact local businesses. Or in other words, if there is significant indirect displacement, some local businesses will be losing their customers. The people who replace those who are displaced may have different shopping patterns, which may result in indirect business displacement, even if rental rates do not change.

Mitigations should include both tax incentives for property owners who rent to local businesses as well as limitation on certain uses – including limitations on size.

Community Facilities and Services

FIRE AND POLICE:

For Fire and Police protection, the Scope of Work states, “the proposed actions are not expected to trigger detailed analyses of police and fire protection serving the project area” and they will not be studied in the DEIS. This is contrary to the instruction in the CEQR Technical Manual considering the scale of the project proposed.

The DEIS should examine the adverse impact that gentrification-driven over policing will have on existing low income and communities of color, in particular on our youth.

The CEQR Technical Manual states that there is no threshold when evaluating the potential of significant impacts, but they should be studied when, there is the introduction of a “sizeable new neighborhood (e.g. Hunters’ Point South.)” The proposed size of the development at 2,775 units,² while smaller than Hunters’ Point South, is not so much smaller as to warrant dismissing any impacts on police and fire protection in the area. Further, the building forms being introduced are new to the area. Do the engine and ladder companies that serve this area have the capacity and equipment necessary to provide services to a 1,000 foot building? Do the local police precincts that serve this area have the capacity to add the officers necessary to provide services to the greatly increased area? Are there other infrastructure or organizational issues that must be considered when staffing up the Police and Fire services necessary to serve what amounts to a new neighborhood?

² This is also over the minimum of for Type 1 action under §617.4(5)(v).

These are questions that the DEIS must answer. The existing capacity of both Police and Fire must be examined, and the impact of the project on these essential community services must be disclosed. If the proposed project discloses an impact that requires new equipment, facilities or other infrastructure, a mitigation plan must be proposed.

SCHOOLS:

The data from the CEQR technical manual for student generation is both out-of-date and imprecise. It is based upon queries of the 2000 Census PUMS file and is for all of Manhattan, rather than localized areas. The student generation tables need to be updated. Simply, the New York City of 2000 does not exist anymore. The analysis should be done using generation tables developed from the most current American Community Survey PUMS file, and the query should be more geographically targeted to CD3, rather than just assuming all of Manhattan functions the same when it comes to child generation. If these changes are not made, the DEIS will likely understate the impact on local schools, especially elementary schools.

The project is at the edge of School District 1, which is an un-zoned district. When evaluating capacity for elementary schools, the analysis should look only at elementary schools that are close to the proposed project and not all schools in the district. The analysis of capacity should examine the two closest elementary schools (PS 134 and 110).

PUBLICLY FUNDED CHILD CARE

The CEQR Technical Manual has not been updated since Universal Pre-K has been instituted in New York City, and the DEIS needs to evaluate the care and education needs of children in Pre-K at public schools and in community based organization, and in publicly funding child care (ACS, Head-Start). Capacity analysis of child care funded by ACS and Head-Start should also consider waiting lists for these facilities. If capacity for publicly funded child care is too low for the needs of the new project, a new on-site facility may be required to mitigate the impact.

LIBRARIES:

Library utilization is much less about items circulating, and much more about services that are obtained by residents in the branches. When examining the capacity of the local libraries in the catchment area, the DEIS should examine how many people local branch libraries can hold, and how many people are actually there during the most popular hours and compare this number to the number of people in the catchment area to determine a capacity and utilization rate for the library services. Using these rates, the capacity and utilization of each branch library can be calculated and the impact of the project on the capacity can be estimated.

HEALTH CARE FACILITIES:

As recommended by the CEQR Technical Manual, the Draft Scope of Work includes no analysis of health care facilities. Due to the critical lack of health care facilities in lower Manhattan, however, which has been exacerbated by the diminution of service at local facilities, there is already a critical need for additional capacity in health care facilities in the area, which will only be exacerbated with the addition of a large number of new residents. The Community District 3 Needs Assessment states: "CD3 is a federally designated health professional shortage area in the fields of primary care, dental care, and mental health," yet there is no actionable plan to improve

access to these services. The DEIS should study the capacity of the health care system and project how much further these new residents will increase that utilization rate. The DEIS should propose methods whereby the City and the applicants will mitigate the impacts of the lack of service in this area.

Electrical Grid: (Con Edison)

Impact of new development on the current transformer and electrical grid system. Requires a study on future impact.

Open Space

According to the CEQR Technical Manual, Open Space may be either publicly accessible, or private, but that only publicly accessible space is used in the quantitative analysis while private open space is a qualitative measure.

Because of several “tower-in-the-park” buildings, the immediate surrounding area has ample private open spaces, with the proposed development adding more to that number. Consequently, the Open Space analysis should focus solely on publicly accessible open spaces. Private open spaces are not a mitigating factor that addresses the lack of public open spaces in this community. While these private spaces are often used informally by the public because of the lack of public open spaces, continued access is not assured even from day-to-day.

If the proposed project demonstrates impacts on public open spaces, the Lead Agency should consider making all or some of the private open space proposed in the projects open and accessible to the public. These spaces should also be subject to minimum standards for amenities offered, much as is done with plazas and other privately owned, publicly accessible open spaces.

Shadows

The water should be classified as a shadow sensitive resource and impacts on the submerged aquatic vegetation and the benthic community should be assessed.

As noted above, because of the lack of public open space in the community, open spaces in large housing projects are often informally used by the public even though they are privately owned. Open spaces that are frequently used by the public should be classified as shadow sensitive resources regardless of their ownership, and the impacts on these spaces should be assessed and, if necessary, mitigated.

Historic and Cultural Resources

The study area for historic and cultural resources needs to be larger considering the size of the proposed buildings. An historic resource that experiences a shadow impact is close enough to be in the study area for Historic and Cultural Resources.

Urban Design and Visual Resources

The urban design of Cherry Street, Clinton Street and the blocks surrounding the proposed LSRD is a mix of 20 - 30 story public housing projects while much of the area west of Madison Street is 5 - 6 story tenement buildings, many of which have ground floor retail. The proposed developments will tower over the existing urban fabric. The DEIS should examine how the new

buildings impact the design framework of the area, whether the buildings maintain a solid street wall, create a sense of place, and promote increased pedestrian use of public space. It should assess whether the new uses constructively engage the existing uses, and disclose where view corridors to the water will be obstructed, and where new buildings may obstruct local landmarks that assist residents and visitors in finding their way around. It should assess whether the new buildings promote and enhance streets and public spaces that are well connected, and should be built with sustainable and maintainable materials and color patterns that complement the surrounding buildings. The DEIS should also examine whether the design uses a lighting scheme or locally designed public art and street furniture that add a strong element of the area's historic urban character. It should also examine whether the LSRD provides good signage to aid in orienting residents and visitors.

Transportation

Because the area is inconvenient to the larger subway network, there is great concern in the community over the project's impact on surface transportation. Care should be taken when determining the mode split for new residents as they will likely not follow typical Manhattan patterns due to the project's distance from the subway. Mode split may be more like waterfront developments in Brooklyn and Queens than elsewhere in Manhattan.

That said, in addition to the East Broadway station on the F, the Grand Street Station on the B and D line will likely get additional usage from the development, as it is the closet stop to get riders to Downtown Brooklyn. Yet no trips are assigned to the Grand Street station. Because of the relative lack of subways in the area, residents of the new development may be willing to travel further than the typical Manhattan resident for the subway. A line-haul analysis should be conducted of the B and D subway lines as well.

The condition of the East Broadway station is terrible. Any capacity analysis of this station's stairways and platforms should take into account the current lack of maintenance. Mitigation of the impact to the East Broadway station should include elevators and electrical escalators on each side of the platform.

There also needs to be a capacity analysis of the bus routes serving the area. The addition of such a large number of residents in an area without good subway access, and no additional on-site parking, suggests that buses will get a larger than typical proportion of the mode split. If significant impacts are shown, the Lead Agency should work the MTA/NYCT to mitigate the impact by increasing service along the lines that are projected to be impacted.

Traffic counts and patterns in the area have seen rapid changes, especially with the advent of taxi alternatives such as Uber and ride share services. The DEIS should use no counts more than three years old. CB3 strongly urges new counts be collected for the baseline analysis. The study should include an analysis of the increased impact of Uber and Uber type services which these combined developments will attract. This analysis should also include the increased traffic to the immediate entrances and exits to the FDR Drive.

The DEIS should include an analysis of the increased bike ridership that will come to the area and how the City and developers can mitigate impacts, including potential conflicts between vehicular, bicycle, and pedestrian traffic.

The Scope states that only on-site parking will be examined. The DEIS should also perform an on-street parking analysis as detailed in the CEQR Technical Manual. This analysis should include a detailed map indicating the key parking regulations on block faces within convenient walking distance of the project site.

The Scope is silent on how parking shortfall is determined. The threshold should be clearly stated and justified. Further, any shortfall that may be met by on-site parking further than ¼ mile from the project site, should be considered when developing mitigation plans for unmet shortfall created by the project.

There needs to be consistency between the parking study area and the traffic study area. If the Grand and Clinton parking garage are in the parking survey, the surrounding intersections should be studied in the traffic analysis. We are also concerned about the assignment method being used in the technical memo included with the Scope, since it does not have vehicular trip assignments on Grand Street or on Clinton Street, north of Henry Street.

Climate Change

Proposed projects must be in line with the Mayor's current 80% GHG reduction by 2050. Details of this alignment should be included in the DEIS.

The DEIS should include an explanation and justification of the "Future Flood Level" projections used in the Flood Elevation Worksheet. Flood projections should extend throughout the expected life of the buildings (100 years), and therefore should at least be outlined up to the year 2120.

Neighborhood Character

Two Bridges' diversity and affordability give the neighborhood its character. Therefore, the project's impact on neighborhood character should focus on socio-economic diversity and impacts on people of color, immigrants, and non-English speaking populations. The study area for Neighborhood Character, since it is so directly related to the residents, should follow the same study area described in the Land Use, Zoning and Public Policy section.

To understand the project's impact on Neighborhood Character, the DEIS should include the following analysis:

The current distribution of households by AMI should be disclosed. As should the distribution for the Future No-Action alternative and the Future With-Action alternative. The No-Action household AMI distribution should be compared with that of the With-Action alternative, in order that the difference discloses how the income mix of the neighborhood is expected to change under With-Action conditions. Understanding how the action will impact the area's AMI levels is critical to understanding change in neighborhood character.

As with AMIs, Neighborhood Character should also analyze the existing mix of affordable versus market-rate housing units in the study area and how that mix will change under both the No-Action and the With-Action alternative.

Alternatives to the project as proposed

In addition to the No-Action alternative, the DEIS should study the following alternatives:

- An alternative that examines the project that accounts for all currently approved amendments to the LSRD Plan that have not yet been built.
- A lesser density / lower-scale alternative that adds additional housing and affordable housing above the No-Action alternative, but which is more in scale with the surrounding neighborhood. This alternative may be modeled after the plan for the area produced by the Chinatown Working Group (CWG) within Sub-District D.
- An alternative design that does not add unnecessary and unwarranted height. For example, the building proposed on site 4A/B is proposed for 1,008 feet to the top of the mechanicals. This height includes 15 floors of mechanical spaces and voids that add 324 feet to the building height and which, presumably, do not count against zoning floor area. While ample mechanical spaces make for good buildings, devoting nearly 1/3 of the building's height to mechanical spaces is extraordinary and introduces bulk to the neighborhood which provides only impacts and no benefits. The Lead Agency should instruct the applicant to study an alternative that minimizes the use of mechanical spaces to introduce unwarranted height.
- Finally, the DEIS should study a No Unmitigated Impact alternative. This may result in an alternative that is more like the CWG alternative, but its purpose would be to demonstrate the changes that would have to be taken to eliminate all of the project's unmitigated impacts. While this alternative may not be feasible in relation to the project objectives, it will serve as a tool that demonstrates the magnitude of change to the project that would be necessary to eliminate impacts.

Sincerely yours,



Jamie Rogers
Board Chair

TESTIMONY BY DR. TOM ANGOTTI ON THE SCOPE OF WORK FOR ENVIRONMENTAL REVIEW OF THE MODIFICATION OF THE TWO BRIDGES LSRD

MAY 25, 2017

Tom Angotti, Ph.D., Professor of Urban Policy and Planning, Hunter College and the Graduate Center, City University of New York. tangotti@hunter.cuny.edu

In the brief moments available to me, I would like to make five points.

1. **A Major Modification is Needed.** While the City Planning Commission is to be commended for asking for an EIS for what they are calling a minor modification of the LSRD, the Commission is skirting the main policy issues here. The three megatowers, following shortly on the construction of the Extell megatower on an adjacent lot, would represent significant changes in the built environment and social composition of the area. The towers, extending over 70 stories, would dwarf the existing buildings in the LSRD and adjacent areas. They would inject a large upper-income population in a neighborhood of low- and moderate-income housing which is vulnerable to privatization and conversion to market-rate housing.

The Planning Commission should understand these changes in the context of the area's history. It began as an urban renewal area in 1967 with the express purpose of providing low- and moderate-income housing. The urban renewal area expired in 2007, only a decade ago, but the city clearly signaled its commitment to protecting the successful development. The underlying zoning would allow an FAR of 10, but at the time the LSRD was created the city did not have MIH, which now allows an FAR up to 12. The current proposal would add 2.5 million square feet of residential space. The Commission also did not anticipate the intensive pressures of gentrification and displacement facing the entire community or the prospect of market-rate housing on NYCHA land, now a real prospect. In analyzing the physical layout the CPC did not contemplate the consequences of huge towers on the remaining sites, placing them in deep shadows, with possible social and public health impacts for existing residents.

Therefore, these proposed changes must be considered a **major** modification, look more extensively at the proposal in all its dimensions, and consider in a more in-depth analysis alternative scenarios. Instead of having an improvised review process, it should be subject to a full ULURP. This is a common sense interpretation of the mission of CPC and ULURP.

2. **Consider the Context of Chinatown.** The Draft Scope of Work does not consider the development sites to be part of the wider Chinatown community. It

only aggregates individual blocks within a ¼ radius, a narrow technocratic approach. It should extend the area of analysis to at least ½ mile, and in some cases beyond that (e.g., flood and socioeconomic analyses). The environmental review proposed in the draft scope would not examine the economic and cultural ties that bind the community together and the historic discrimination that the neighborhood has faced (for example, the neglect of Chinatown after 9/11). The analysis of indirect displacement cannot be simply a numbers game. The analysis must go beyond any racially cleansed “Neighborhood Character” analysis or patronizing view of Chinatown as a unique tourist destination. Displacement impacts must be analyzed in the context of the history of discrimination and segregation faced by Chinatown, including by the city’s land use policies. The same holds for the impacts on public housing and locally owned businesses.

- 3. Water: Flood Risk and Waste Water.** The city’s own resiliency policies accept that planning for development along the waterfront, particularly in vulnerable areas like lower Manhattan, requires long-term analysis and solutions involving residents and communities. It makes no sense to build so much in an area already known to be extremely vulnerable to flooding. It is not good enough to mitigate the danger through building design; even if the new buildings were to be protected in a catastrophic flood, the adjacent buildings could be so severely damaged they would have to be abandoned. This is not a resiliency strategy but an environmental injustice. It does not recognize the importance of planning with and for communities. And if anything, flood risks are likely to be underestimated given the uncertainties about global warming.

The new development would also exacerbate the city’s chronic stormwater overflow problem and further violate federal statutes and a consent decree. This matter requires a more in-depth and long-term review by the CPC and other city, state and federal agencies, not a minor modification to the LSRD.

- 4. Air Quality and Noise.** The Scope acknowledges the public health risks associated with building the towers within 200 feet of a major freeway. However, the mitigation offered in advance is inadequate – building window attenuation. This assumes a neighborhood that must live with their windows closed and requires year-round heating and air conditioning. This is not sustainable, either as public health or energy policy. Does the CPC really want to plan for a city in which safe spaces are locked inside towers lining highways?
- 5. Alternatives.** The Scope of Work must include an in-depth analysis of the community plan developed by the Chinatown Working Group as an alternative. This plan was supported by three community boards, elected officials and a small grant from the city, only to be summarily dismissed by the CPC.

Robert Dobruskin, AICP, Director
Office of City Planning
120 Broadway, New York, N.Y. 10271
May 25, 2016

Re: Comments on the Two Bridges LSRD
CEQR No. 17DCP148M

Please consider the following comments on the Draft Scope of Work for the Draft Environmental Impact Statement ("DEIS") that will study the environmental impacts for the proposed amendments to the Two Bridges Large-Scale Residential Development Plan (LSRD).

The proposed project will introduce building forms to this neighborhood that are new to the District and contrary to local plans. These building forms were not considered possible, considering the Large-Scale Residential Development Plan that governs the area.

The project as described will introduce new building forms, informally referred to as "super-talls," to a district composed largely of medium density housing. While the underlying zoning allows such density, the right to build under those densities was removed with the adoption of the Large-Scale Residential Development Plan (LSRD) in 1972. The LSRD plan limited the development on the site to, generally, what can be seen there now: developments of between 3.5 and 4.9 FAR, with buildings ranging from one to 26 stories, surrounded by open space. The existing level of development is in-scale and in context with the surrounding development.

The primary governance of the use, mass and plan of this site is the LSRD, not the underlying zoning. Considering the scale of the change proposed, the determination that this action is a minor modification of the LSRD should not rest solely on the underlying zoning.

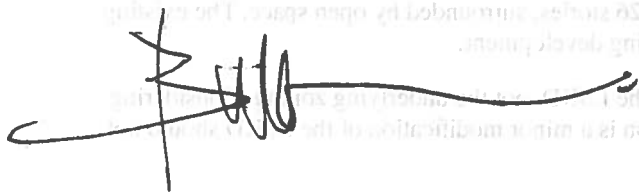
The amendment of the LSRD plan is not a minor modification.

The DEIS should include effects on: schools, publicly funded child care, libraries, healthcare facilities and hospitals, direct and indirect displacement of residents and small businesses, open space, electrical grid, shadows, historical resources, transportation, climate change, neighborhood character. The DEIS should examine the adverse impact that gentrification-driven over policing will have on existing low income and communities of color, in particular on our youth. I fully endorse the comments submitted by Manhattan's Community Board 3 which further explain each one of these aspects.

More specific comments for your consideration:

- The Megatower Group Project requires special permits, special permit modifications, and/or authorizations under NYC Zoning Resolution, Article VII, Chapter 8 (ZR) to build in the LSRD. Redistribution of bulk and open space, increases to the maximum developable floor area and lot coverage, wholesale restrictions on air and light access, and total alteration of neighborhood character must be separately studied under applicable provisions and procedures of the ZR
- ZR § 78-313 requires the CPC to issue affirmative "Findings" that Megatower Group authorizations and/or special permits under ZR § § 78-311 or 78-312 won't interfere with neighborhood character, restrict air and light access or privacy, introduce detrimental building bulk, or create traffic congestion

- The DEIS must treat affected Public Housing and the occupants as sunlight-sensitive resources in its "Shadow" assessment, and the EIS shadow impacts identified must meet the standards of ZR § 78-313 and show no adverse effects to light and air at adjacent properties
- The DEIS must assess: systemic overload of the infrastructure, pumping, flow, flow control, treatment, and discharge capacities of the entire Newtown Creek drainage basin (Lower Manhattan to 14th Street on the West Side, to 71st Street on the East Side); possible interference with achieving compliance with pending Administrative and Consent Orders issued to the City of New York for violations of Federal and State water pollution laws; and interference with Impaired Water De-listing of the Newtown Creek pursuant to the Federal Clean Water Act from constructing and operating the three proposed megatowers in the LSRD
- The DEIS must assess valid Alternatives to the Proposed Action
- The DEIS must assess Cumulative Impacts from the Proposed Action, especially those created by multiple large scale developments in lower Manhattan
- The DEIS must include Involved Parties: USEPA, NYSDEC, NYCDEP, US HUD, and FEMA



Francisca Benitez

62 East Broadway #5, New York, NY 10002, US

+1.917.449.5187 francisca.benitez@gmail.com

From: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Sent: Tuesday, May 30, 2017 9:57 AM
To: Evan Lemonides (DCP); Samuel Nourieli (DCP); Joel Kolkmann (DCP); Xinyu Liang (DCP)
Subject: FW: Attn: Robert Dobruskin Concerned Resident

From: Lauren Boyle [<mailto:boyle.lauren@gmail.com>]
Sent: Thursday, May 25, 2017 7:42 PM
To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Subject: Attn: Robert Dobruskin Concerned Resident

Dear Robert,

I live in Hillman Coops. I couldn't attend the meetings today BUT I am extremely concerned, and as is everyone I know in the community, about the incoming 5000 units (2,775 unit and the 2,200 at Essex) to our neighborhood.

What about the stress on the buses, the parking, the police and fire departments, let alone the schools (I have 2 kids entering Pre-K next year)? This has not been studied thoroughly and it needs to be. We feel that we have no voice and our leaders have sold us out to the developers...

What are you doing about this problem? and it is a problem despite what the developers would like us to believe,

thank you for your time.

Lauren

From: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Sent: Thursday, May 25, 2017 11:28 AM
To: Evan Lemonides (DCP); Samuel Nourieli (DCP); Joel Kolkmann (DCP); Xinyu Liang (DCP)
Cc: Erik Botsford (DCP); Danielle J. DeCerbo (DCP)
Subject: FW: 250 South Street and 145 Clinton Street

Scoping comments on Two Bridges. Chin was copied.

ROBERT DOBRUSKIN, AICP

DIRECTOR • ENVIRONMENTAL ASSESSMENT AND REVIEW DIVISION

NYC DEPT. OF CITY PLANNING

120 BROADWAY, 31ST FLOOR • NEW YORK, NY 10271

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www.nyc.gov/planning

From: Brian Faucette - Derek Eller Gallery [<mailto:brian@derekeller.com>]
Sent: Thursday, May 25, 2017 11:23 AM
To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Cc: niouy@nyassembly.gov; squadron@nysenate.gov; Magaret Chin <chin@council.nyc.gov>
Subject: 250 South Street and 145 Clinton Street

Good morning,

I am writing to express concern over the city's lack of review for new residential buildings in the Lower East Side, specifically new residential buildings at 250 South Street and 145 Clinton Street. I would ask at minimum that the city require these developers to submit study's outlining the strains this volume of new residential units will place on our police and fire departments, local low income housing, public transportation and sewage system. I would also like to remind the elected officials cc'd here that a failure to hold developers accountable will be seen by many in the neighborhood as a failure of leadership.

Best regards,

Brian Faucette

Derek Eller Gallery
300 Broome Street
New York, NY 10002
T 212.206.6411
F 212.206.6977
info@derekeller.com
www.derekeller.com

From: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Sent: Thursday, May 25, 2017 12:19 PM
To: Evan Lemonides (DCP); Samuel Nourieli (DCP); Joel Kolkmann (DCP); Xinyu Liang (DCP)
Cc: Erik Botsford (DCP); Danielle J. DeCerbo (DCP)
Subject: FW: Two Bridges LSRD

From: Audrey Hawkins [<mailto:audrey.hawkins@gmail.com>]
Sent: Thursday, May 25, 2017 12:05 PM
To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Cc: Magaret Chin <chin@council.nyc.gov>; niouy@nyassembly.gov; squadron@nysenate.gov
Subject: Two Bridges LSRD

Dear Mr. Dobruskin,

I am writing to you concerning the Two Bridges LSRD proposal. As a resident of the Lower East Side, I am against the precipitous pace and scale of the developments as they are currently being proposed. A development on this scale will adversely impact every facet of life in this community, from public transportation, to traffic and parking, to the displacement of lower income people, to the quality of life of the residents who can afford to stay. Below are my itemized concerns.

1. The developers are falsely claiming that bus ridership will be so minimally affected that they don't even have to study the bus lines serving the neighborhood! As a frequent user of the buses and trains on the Lower East Side, I can tell you that they are already strained to the breaking point. Many a morning, I have to let a train pass before I can get on because of the crowds. A more densely populated neighborhood means even more commuters. How can the developers not study this?!
2. They are claiming they do not need to review police and fire department capacity because it is not a "sizeable new neighborhood". If 2,775 (or, 5,000) residential units aren't a "sizeable new neighborhood", what is? By the same [CEQR](#) standards the development is considered a "sizeable new neighborhood" when it comes to elementary schools, high schools, libraries, health care facilities, and child care facilities...so why not fire and police?
3. According to the City and developers, this project is "only" adding 2,775 units... the 2,200 other units at Essex Crossing and 250 South Street were already in progress. Why is the study not looking into the compound effects of these 2,200+ units coming online in the next three years in addition to the 2,750 units? This huge development does not exist in a vacuum. They must study our actual community—not one that only exists on paper in the offices of luxury real estate developers and their high paid lobbyists and consultants.
4. Traffic and parking: They are not planning on additional traffic being a huge barrier. What do they think will happen to our streets the vehicles associated with 5,000 new units are added to our local streets? In regard to parking, they are claiming local lots have 3,000 spot capacity, but when considering lots with waiting lists and pending closures there are actually a negative amount of spots available.
5. Water and sewer: The developer claims this development will utilize over 1,000,000 gallons of water per day (not including the water required by the 2,200 other units previously mentioned). Our sewer system, when running at capacity, simply dumps waste into our already polluted waterways. In addition, what impact will this development have on our electrical grid and other infrastructure and utilities?
6. The developers are not going to study the impact of this development on surrounding subsidized housing or secondary displacement, although it is directly surrounded by thousands of units of low income housing. As one of the last affordable neighborhoods in Manhattan, this should be a serious concern.

Thank you very much for your time and attention,

Audrey Hawkins

DEPT OF CITY PLANNING
RECEIVED

Lisa Kaplan 2017 JUN -7 PM 3: 30
52 E. 1st Street #2A
New York, NY 10003 ENVIRONMENTAL REVIEW DIV.
212-477-5315

Robert Dobruskin, AICP
New York City Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271

RE: CB3 Comments on Draft Scope of Work for Two
Bridges LSRD

Dear Mr. Dobruskin,

I submit this written testimony on the Draft Scope of Work for the Draft Environmental Impact Statement that will study the environmental impacts for the proposed amendments to the Two Bridges Large-Scale Residential Development Plan (LSRD). This is a further elaboration on the oral testimony I submitted at the public hearing on May 25, 2017.

As an urban planner and an affordable housing activist on the Lower East Side since 1973, who was involved indirectly in the planning for and the rent up of some of the buildings that are currently occupied in what was then the Two Bridges Urban Renewal Area, I can attest that the current development proposal is an affront to the original purpose of that plan.

I did take the time to carefully read the entire draft scope, and the major take away that can't be ignored is the absurd premise that this proposal represents a minor change. If this is minor, I challenge the Department of City Planning (DCP) to explain what it would take to get to a major change. What is being proposed is more than doubling the density of the LSRD from its current build out condition. Buildings are going from approximately 30 to 80 stories and from an FAR of less than five to twelve.

It is mind boggling to think how this will practically work. I challenge each of those responsible for this approval process at the DCP to walk around the site and personally experience the impact this proposal will have. From a visceral point of view, it's impossible to reach the conclusion that this will not change the community character, however I believe that the way the draft scope proposes to study this matter is tailored to miss the obvious.

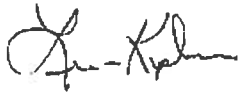
The methodology for evaluating displacement according to the CEQR manual is ridiculous, outmoded and naïve. To think that displacement does not occur in rent regulated housing or even in public housing when market pressures have reached the unprecedented levels they have in our community is absurd. Everyone in the Lower East Side, and at least I thought that every sophisticated observer of urban policy in NYC, knew that rent regulations are no obstacle to landlords bent on harassment. At minimum, in this case the study area for the socio-economic analysis must be at least 1/2 mile and be drawn to reflect areas with concentration of privately owned housing.

I am also outraged that the draft scope states that the purpose and need of this project is to produce affordable housing units – at 25% of the total to be built – while essentially ignoring the impact of the other 75% of the units. Low income housing is truly what this community wants and needs, but if this project were to go through this degree of benefit, with 694 units at a yet undisclosed definition of affordability, is sorely insufficient. Any mitigation of the impact of this project must be far more than 25% and must be targeted at households that reflect the current residents of the community – the vast majority of whom are below 80% AMI. I call your attention to the agreement that Community Board 3 (CB3) reached which set the number of affordable housing at 50% without development at the scale proposed for this project.

Lastly, the draft scope does not propose to review sufficient alternatives to fully understand the impacts of this plan. At least one additional development alternative should be included in the scope. Based on the huge increase in scale of the proposed development - which is not only out of character within the LSRD but also with the surrounding community, as well as contrary to DCP's long stated standards of only proposing the highest density zonings on wide streets convenient to mass transit - it is necessary to review an alternative which is built at a density consistent with surrounding zonings and has reasonable height caps and includes mandatory inclusionary zoning. Such an additional alternative should be based on such plans as the Chinatown Working Group proposal or the CB3 initiated Lower East Side-East Village Rezoning.

In conclusion, I urge you to fully review the impact of this ill-conceived proposal to a degree that it's negative impacts are fully brought to light and that the unique and historic character of the Lower East Side is not forever altered.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Kaplan". The signature is fluid and cursive, with the first name "Lisa" and the last name "Kaplan" clearly distinguishable.

Lisa Kaplan

From: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Sent: Tuesday, May 30, 2017 9:57 AM
To: Evan Lemonides (DCP); Samuel Nourieli (DCP); Joel Kolkmann (DCP); Xinyu Liang (DCP)
Cc: Danielle J. DeCerbo (DCP)
Subject: FW: PROBLEMS WITH LUXURY DEVELOPMENT!!!!

From: Jackie Klempay [<mailto:klempay@gmail.com>]
Sent: Thursday, May 25, 2017 6:58 PM
To: MN CB 3 <info@cb3manhattan.org>; MBP Info <info@manhattanbp.nyc.gov>; Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>; Margaret Chin <chin@council.nyc.gov>; niouy@nyassembly.gov; squadron@nysenate.gov
Subject: PROBLEMS WITH LUXURY DEVELOPMENT!!!!

Dear All,

I live on East Broadway and have a small business on Henry Street. I love this neighborhood, it's diversity, and the way it still feels like a neighborhood with a thriving community. It's not only a tourist trap or a playground for the rich -- like soho and williamsburg, in which over-development has already destroyed once thriving communities.

I am worried that the planned luxury developments will displace me, my neighbors, our businesses and livelihoods. While I would like to see the development halted completely, I am especially disturbed to learn that with all of the planned development there are not planned environmental, educational, and structural plans also in place.

When all of New York City is developed, where will the workers live? Where will the small businesses be? Where will the artists go? Will everything turn into a CVS?

I am specifically referencing the pending development of three huge 62-79 story buildings along the waterfront south of Clinton Street encompassing 2,775 apartments in addition to the 1,200 unit 250 South Street buildings and the 1,000 unit Essex Crossing. These 5,000 new units and their largely market rate tenants will have a huge (negative) impact on our neighborhood and our quality of life. **We must hold the City responsible for conducting the appropriate environmental reviews required to mitigate the negative impacts these developments will have.**

I stand with my neighbors in the following:

1. The developers are falsely claiming that bus ridership will be so minimally affected that they don't even have to study the bus lines serving the neighborhood!
2. They are claiming they do not need to review police and fire department capacity because it is not a "sizeable new neighborhood". If 2,775 (or, 5,000) residential units aren't a "sizeable new neighborhood", what is? By the

same [CEQR](#) standards the development is considered a “sizeable new neighborhood” when it comes to elementary schools, high schools, libraries, health care facilities, and child care facilities...so why not fire and police?

3. According to the City and developers, this project is “only” adding 2,775 units... the 2,200 other units at Essex Crossing and 250 South Street were already in progress. Why is the study not looking into the compound effects of these 2,200+ units coming online in the next three years in addition to the 2,750 units? This huge development does not exist in a vacuum. We must demand they study our actual community - not one that only exists on paper in the offices of luxury real estate developers and their high paid lobbyists and consultants.

4. Traffic and parking- They are not planning on additional traffic being a huge barrier. What do they think will happen to our streets the vehicles associated with 5,000 new units are added to our local streets? In regard to parking, they are claiming local lots have 3,000 spot capacity, but when considering lots with waiting lists and pending closures there are actually a negative amount of spots available.

5. Water and sewer- this developers claim this development will utilize over 1,000,000 gallons of water per day (not including the water required by the 2,200 other units previously mentioned). Our sewer system, when running at capacity, simply dumps waste into our already polluted waterways. In addition, what impact will this development have on our electrical grid and other infrastructure and utilities?

6. The developers are not going to study the impact of this development on surrounding subsidized housing or secondary displacement, although it is directly surrounded by thousands of units of low income housing.

Sincerely,

Jackie Klempay

--

Jackie Klempay

SITUATIONS
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NEW YORK, NY 10002

www.situations.us

MICHAEL KRAMER

143 Avenue B #16B,
New York, New York 10009
Email: michaelkramermk@gmail.com

"It is evident that any major residential development in the Two Bridges area would necessitate construction of an additional new elementary school. The possibility of locating such a school in the block bounded by Rutgers Slip, Cherry Street, Pike Street (Slip) and South Street should be carefully investigated, since such a location would serve the new development and several of the existing developments by providing needed flexibility in districting." (page 4, On Proposed Urban Renewal Areas Two Bridges, January 1961)

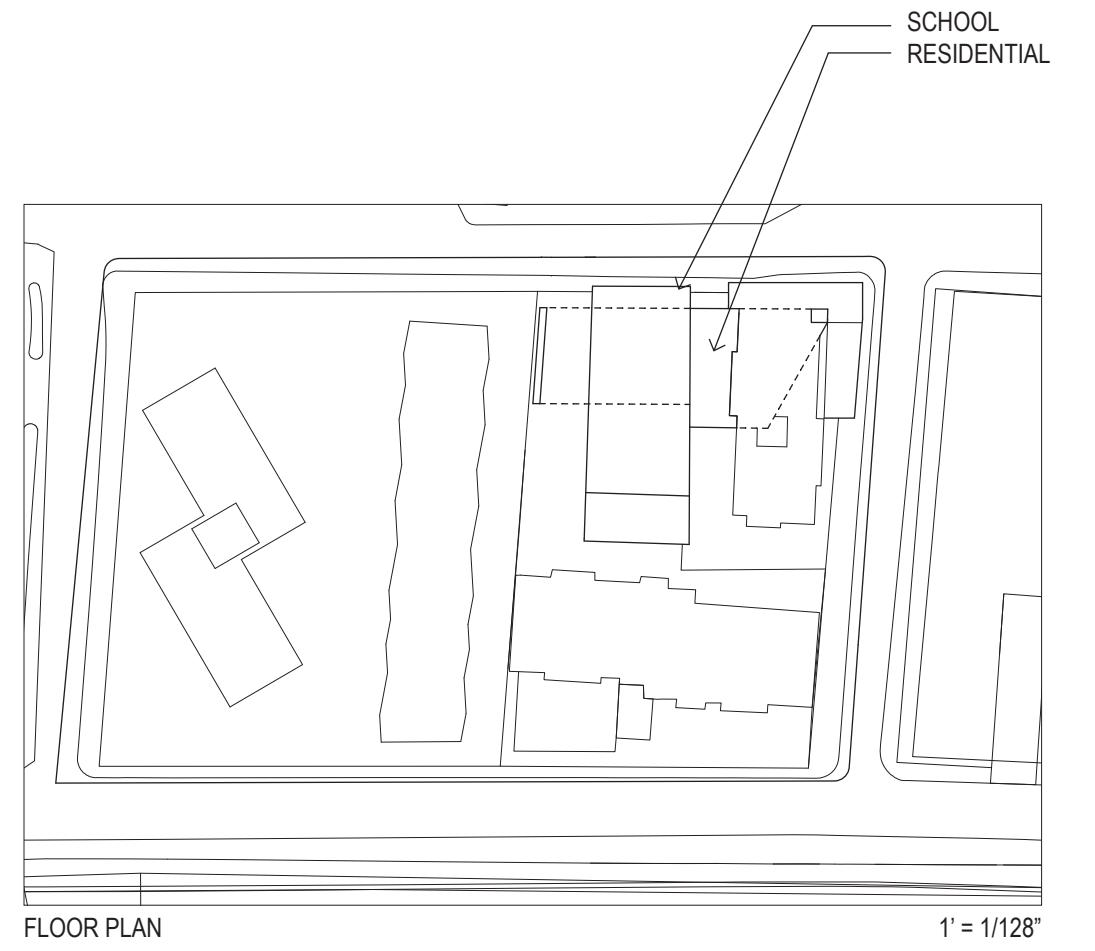
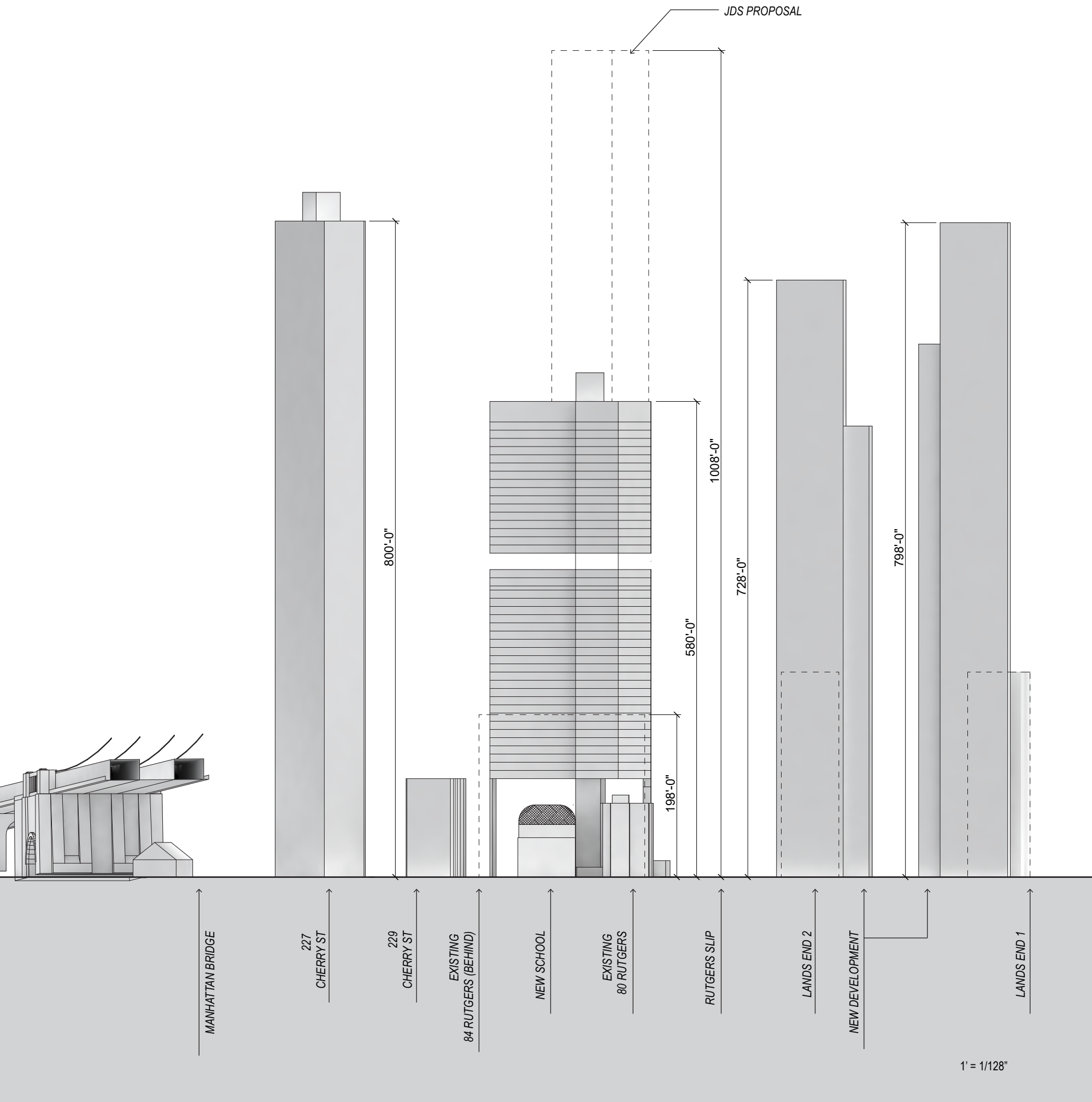
My name is Michael Kramer and I am submitting my testimony to discuss the need for a better plan with a less invasive and more thoughtful footprint at 247 Cherry Street.

By way of example, Little Cherry LLC, the ground tenant at 247 Cherry Street, had previously developed plans in concert with Two Bridges and Settlement Housing for a tower which would be almost half the size of the JDS mega-tower, with a free-standing school building below. This plan is consistent with the public taking which carefully defined the intent of the January 1961 Two Bridges Urban Renewal Plan which is still in effect today at this site. A plan such as this should be considered as a "reasonable alternative" to the JDS Development's proposed tower for the purposes of this Scoping Hearing.

The addition of affordable housing units "with the completion of LaGuardia Houses and the beginning of clearance for Rutgers House" (page 2, On Proposed Urban Renewal Areas Two Bridges, January 1961) was the impetus for the 1966 construction of an elementary school at 327 Cherry Street (PS 184). Clearly the cumulative addition of thousands of new market-rate and affordable units as contemplated in this Scoping Hearing, the ongoing construction of a 78 Story residential tower and a 12 Story residential "affordable" tower at 227 Cherry Street, the new units of housing being created at nearby Essex Crossing, and the anticipated construction of a new residential tower adjacent to the NYCHA LaGuardia Houses, would make the construction of at least one new elementary school imperative.

As presently constituted, this Scoping Hearing does not anticipate the cumulative impact of increased school enrollment within one-half a mile of the new housing units both anticipated and under construction, as it relates to the Urban Renewal Plan's mandate to provide for a new elementary school at this site.

Thank you for your consideration of my testimony. A copy of the 1961 Two Bridges Urban Renewal Plan is attached for your review along with, by way of example, a rendering of the tower that Little Cherry had worked on with Two Bridges and Settlement Housing.



LITTLE CHERRY DEVELOPMENT



AERIAL RENDERING

LITTLE CHERRY DEVELOPMENT



STREET VIEW RENDERING FACING NORTH

Edwin Friedman

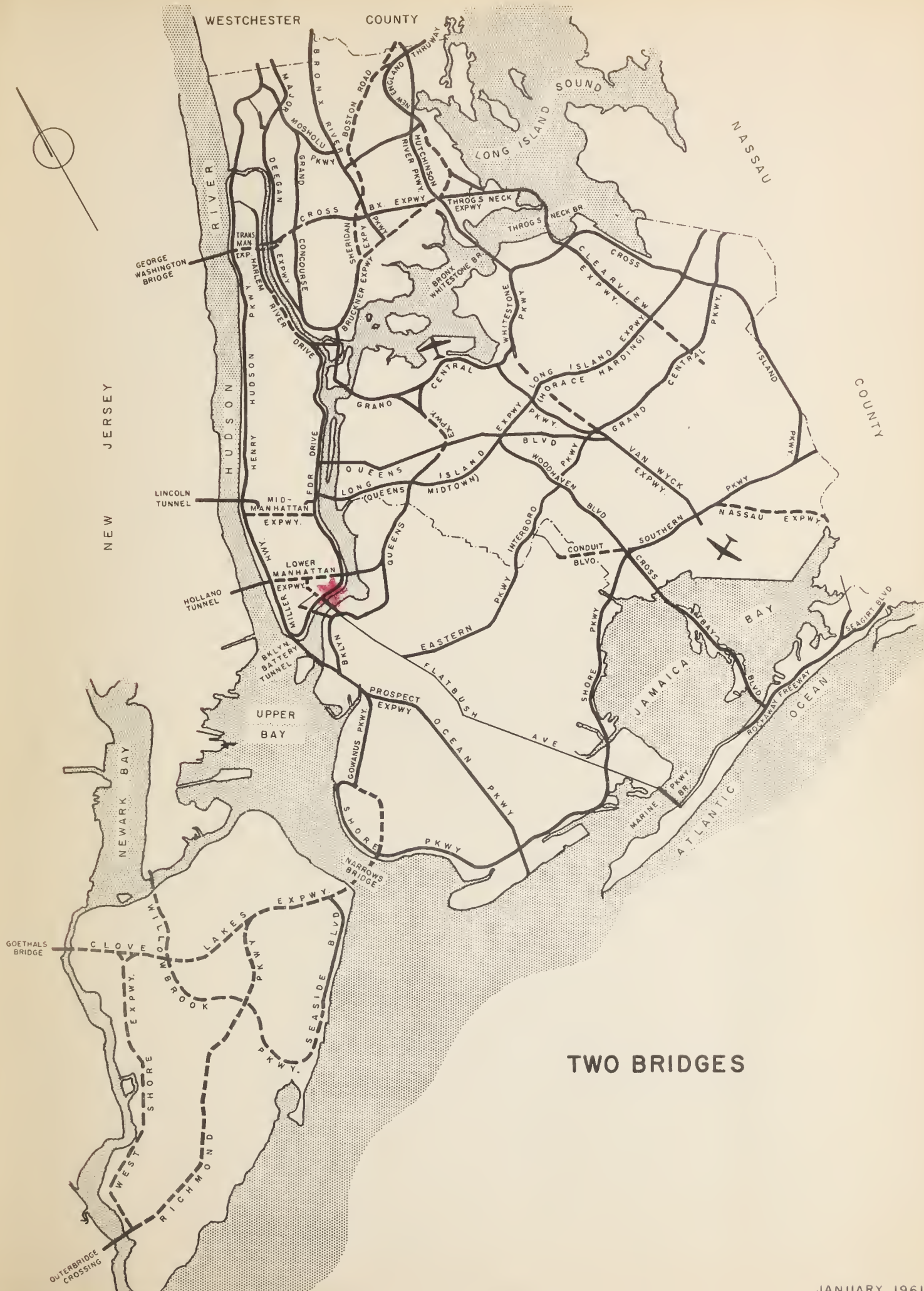
to: HOUSING AND REDEVELOPMENT BOARD
from: DEPARTMENT OF CITY PLANNING

On
Proposed
Urban
Renewal
Areas

Two Bridges



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TWO BRIDGES

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KEY TO LAND USE MAP - 1959-60

<u>Open Land Uses</u>	<u>Non-residential Uses</u>
1. Vacant Land	8. Commercial & Retail
1-A. Used Automobile Lot	8-O. Office
1-F. Farm	9. Light Industry
1-P. Accessory Parking Lot	9-W. Warehouse & Storage Yard
1-P. Licensed Parking Lot	10. Automotive Storage & Service
1-J. Licensed Junk Yard	11. Heavy Industry
2. Park & Outdoor Recreation	
	<u>Other Uses</u>
<u>Residential Uses</u>	12. Public & Private Institution
3. One-Family Detached	13. Transportation
4. One-Family Attached	
5. Two-Family	
6. Walkup Multiple	
7. Elevator Multiple	
H. Hotel (Shown with "6" or "7")	

NOTE: Predominant use may occasionally be followed by subordinate uses.
For example, "7-10" would mean an elevator multiple dwelling with a garage.

Two Bridges

Borough:	Manhattan
Boundaries:	Pike Street, Cherry Street, Montgomery Street, and South Street.
Gross Area:	14.7 Acres

Recommendations

The Two Bridges site is recommended for redevelopment because it has an excellent residential potential and involves only a minimum of tenant relocation. Redevelopment of this area presents an opportunity to improve the economic balance of the community by attracting more middle-income families. It also will result in a substantial increase in the available housing supply, some of which could be used for relocation housing to expedite the redevelopment of other critical sections. Strong community support for redevelopment of the area has already been evidenced.

Land uses and assessed valuations

The site represents the last residue in a residential neighborhood of the industrial activity once related to the East River piers a half century ago. The major existing uses consist of warehousing, storage (with a sizeable concentration of waste paper handlers), and a small amount of manufacturing. There are a few scattered vacant lots in the area. Most of the buildings are in poor condition. No new buildings have been constructed in several decades.

The area to the north has undergone a radical transformation in the past few years with the completion of La Guardia Houses and the beginning of clearance for Rutgers Houses. To the east the site is adjacent to Vladeck Houses and Corlears Hook, a Title I cooperative. The interstitial area between La Guardia and Vladeck Houses has already been cleared for Simkhovitch Houses, a N.Y.C.H.A. middle-income cooperative development. With the residential character of the Lower East Side having thus been reaffirmed, the Two Bridges site, as now developed, constitutes an intrusive and blighting pocket.

Total assessed valuation for land and buildings is approximately \$4,500,000, of which approximately \$500,000, represents exempt property consisting of a playground, two small parks, and a pumping station of the Department of Water Supply, Gas and Electricity. Block assessed valuations per square foot range from a low of \$4.20 to a high of \$11.83. The average assessed valuation per square foot for the entire area is approximately \$9.50.

Zoning and planning considerations

In the Comprehensive Amendment of the Zoning Resolution the eight block area is placed in a C6-4 District, reflecting its existing uses. For residential redevelopment the site should be re-mapped R7. This designation is appropriate in consideration of the nature of the surrounding R7 area, the availability of community facilities, and the maintenance of adequate standards of light, air and open space.

Development of this area for residential use would be another step forward in the continuing redevelopment and renewal of the Lower East Side community. At present, the site is a blighting influence as a result of its condition, appearance, and the considerable volume of truck traffic which it

generates. With residential redevelopment the area would be compatible with surrounding uses would result in a significant increase in the available housing supply for middle-income families.

While substantial strides have been made in recent years in providing middle-income housing and in moving in the direction of a more balanced neighborhood, additional middle-income housing is still needed to offset the preponderance of low-income housing which characterizes the surrounding community.

The Department of Marine and Aviation has agreed that it does not need the Two Bridges site for any contemplated redevelopment of East River piers. Further, the Department of Marine and Aviation has stated that necessary steps would be taken to insure that there would be no conflict between the possible redevelopment of the piers and any residential redevelopment in this area. The Department of City Planning has recommended that serious consideration be given to possible recreational uses along the waterfront tying in with East River Park immediately adjacent to the east.

The southern boundary of the urban renewal site abuts the viaduct of Franklin D. Roosevelt Drive. The height of the viaduct suggests the possibility of designing mixed development, with the lower floors devoted to non-residential uses oriented toward South Street, and with residences above. A mixed structure permitting certain types of non-residential and residential uses would probably necessitate a change in the amended Zoning Resolution.

Rapid transit and other transportation factors

The Two Bridges site is served by the Grand Street bus, the Avenue B bus, and the Madison Street bus, which provide direct transportation to shopping and business districts and to the Independent, BMT and IRT subway

lines.

The area does not present any through traffic problem.

Access to the area from Roosevelt Drive is provided by the South Street exit, and it is possible to obtain access to the Drive going uptown by passing under the viaduct at Montgomery Street. Adequate and underutilized capacity for through movement is provided by Pike Street and by Houston Street via the Roosevelt Drive. Montgomery Street, adjacent to the site, has been approved for widening from its present 80 feet to 90 feet.

Relocation problems would be minimal. The area has only 20 dwelling units in six buildings, and a population of approximately 100. The general quality of the residential structures is poor. Redevelopment within R7 standards would permit a substantial net increase of approximately 1,450 dwelling units.

Community facilities and public improvements

The Lower East Side has a number of excellent private community institutions, such as the Henry Street Settlement and the Educational Alliance.

Nearby public elementary and junior high schools are fully utilized. Several new schools are in the planning stage to replace obsolete structures and to provide sufficient capacity to meet presently anticipated increased enrollments. It is evident that any major residential development in the Two Bridges area would necessitate construction of an additional new elementary school. The possibility of locating such a school in the block bounded by Rutgers Slip, Cherry Street, Pike Street and South Street should be carefully investigated, since such a location would serve the new development and several of the existing developments by providing needed flexibility in districting. This would, of course, reduce the total number of dwelling units

possible on the site. In addition, the effect of the project on junior high school enrollment will have to be reviewed with the Board of Education and the Department of City Planning when the Housing and Redevelopment Board considers active planning of the site.

At the present time no further public improvements affecting the area are contemplated besides those mentioned in preceding sections of this report.

Neighborhood and area considerations

The redevelopment of the Two Bridges site for residential use is a logical step in the continuing redevelopment of the Lower East Side. The Two Bridges Neighborhood Council and the Lower East Side Neighborhoods Association have done intensive work in furthering the redevelopment of this area. Their strong support for a middle-income project is already evident, and it may be anticipated that the larger community would be equally strong in its support. Because of its location overlooking the East River, the Two Bridges area represents a highly desirable housing site. In order to create a more balanced neighborhood, it is strongly recommended that at least part of the site be redeveloped to attract as high an income group as possible.

While the redevelopment of the Two Bridges urban renewal area would have the unqualified support of most of the community, some opposition may be expected from groups interested in maintaining the present non-residential character of the area. Concurrent programs for industrial redevelopment and industrial park development should be valuable in providing sites for relocation of such uses now located in this area and could minimize or eliminate much opposition.

LSRD Environmental Impact Statement Testimony

May 25, 2017

The 77 page scoping document released by the Two Bridges LSRD Developers makes egregious claims about the impacts this development will have on the neighborhood and surrounding communities. It includes bad faith estimates and misleading data that proves these unscrupulous developers are making every possible effort to skirt the letter of the law, which requires that they mitigate the negative aspects of this huge new development.

1. The EIS must examine the proposed projects and the environmental setting. However, it is ignoring the 2,200 new units at Essex Crossing and 250 South Street that will come online in the next three years during the LSRD development timeline. To ensure accuracy, the EIS must consider what this neighborhood will be at project completion, or it is not an honest study of the real world environmental setting. Depending on what you consider the surrounding area, these developments are increasing population density 28-31%.
 - The traditional "Two Bridges" Neighborhood that encompasses Census Tracts 2.01, 6, 8, 25, and 27 include 12,160 units. The 2,775 LSRD units + 1,000 units at 250 South Street will increase the density of this neighborhood by 31%.
 - The area north and west of the new developments that encompass Census Tracts 2.01, 2.02, 6, 8, 10, 12, 14.01, and 14.02 include 17,993 units. The 2,775 units + 1,000 units at 250 South Street and 1,200 at Essex Crossing will increase the density of this neighborhood by 28%.
2. The study will look at subway ridership, but claims that 2,775 units will not increase bus ridership enough to bother studying. This bold claim shows how detached the developers are from reality. Far smaller residential projects of 1,000 residential units have been required to conduct a bus analysis as part of their EIS, so why not this one which is developing almost three times as many units?
 - The M15 is the second busiest bus line in the City, serving over 46,000 riders each day.
 - The M22 is one of the least used bus routes in the City, serving only 2,600 riders per day. However, the vast majority of these passengers travel on one of the several rush hour buses, which are at or over capacity.
 - The study is not even considering the M14a bus, as it is slightly farther than the .25 mile study area, which leads into another major flaw of this study:
3. The developers are not using standard data collection procedures. When they didn't get the desired results by studying parking with .25 miles, they simply changed the parameters of the study to .5 miles! The parking study on pages 64-65 of the scoping document includes many mistakes and bad estimates. Even within the expanded .5 mile study areas, there are not 3,085 available parking spots:
 - One of the lots (#2) with 63 spots has already closed. Leaving 3,022 spots to analyze.
 - Two of the lots (#1 & #10) encompassing 857 of the 3,085 spots are planning on closing, leaving 2,228 spots to analyze.
 - Out of the remaining 14 lots, the vast majority are at capacity with waiting lists, reducing 2,228 spots to close to zero.
 - Although the zoning of the LRS D site does not require parking, the reality is that there are going to be thousands more vehicles in this neighborhood that need spots. What is the developer's actual plan to address this?

4. The developers are claiming they do not need to review police and fire department capacity because it is not a “sizeable new neighborhood”. By the same CEQR standards the LSRD is considered a “sizeable new neighborhood” when it comes to elementary schools, high schools, libraries, health care facilities, and child care facilities...so why not fire and police? Do our local fire and police departments have the capacity to serve a neighborhood that is 28-31% denser than it is today? Has anyone asked them? How will we know unless this is part of the study?
5. The study of Proposed Project Incremental Vehicle Trips needs to be adjusted to reflect reality. Several of these blocks were selected by the developers to skew the study data, while busier streets closer to the development are mysteriously absent from the study. Those of us who actually live in this community know that:
 - Many of the Chinatown blocks indicated in Inset 3 on Page 69 such as Pell or Bayard Street are a mile away and will show little to no change in traffic from vehicles associated with the LSRD.
 - The EIS should study blocks that will be most affected NOT currently included in the current scoping document - specifically Clinton Street north towards Grand Street, Essex Street, and Grand Street between Montgomery Street and Essex Street, many of which serve as approaches to the Williamsburg Bridge and are the major access points to and from the neighborhood.
6. There are many other factors that will be surveyed as part of the EIS not listed above yet are no less important including the over 1 million gallons of waste water the LSRD projects will generate each day. Our sewer system, when running at capacity, simply dumps waste into our already polluted waterways.

In summary, we need an honest study that will provide accurate results.

- **The LSRD does not exist in a vacuum. All aspects of the EIS should account for the 2,200 new units not currently operational but set to open during the LSRD development timeline.**
- **The City needs to ensure accurate measurements of the impact of this development, not more of the bad faith lies and sloppy estimates we have been fed.**
- **We must demand an objective and accurate EIS. It must look at our existing, real community - not one that only exists on paper and spreadsheets in the offices of luxury real estate developers and their high paid lobbyists and consultants.**

Thank you.

Sam Moskowitz
25 Montgomery Street #14E
NY, NY, 10002
Samuelkmoskowitz@gmail.com

From: Samuel Moskowitz [mailto:samuelkmoskowitz@gmail.com]

Sent: Wednesday, May 31, 2017 2:50 PM

To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>

Subject: Two Bridges LSRD Tes mony

Dear Mr. Dobruskin:

My testimony is as follows, thank you.

LSRD Environmental Impact Statement Testimony

May 25, 2017

The 77 page scoping document released by the Two Bridges LSRD Developers makes egregious claims about the impacts this development will have on the neighborhood and surrounding communities. It includes bad faith estimates and misleading data that proves these unscrupulous developers are making every possible effort to skirt the letter of the law, which requires that they mitigate the negative aspects of this huge new development.

1. The EIS must examine the proposed projects and the environmental setting. However, it is ignoring the 2,200 new units at Essex Crossing and 250 South Street that will come online in the next three years during the LSRD development timeline. To ensure accuracy, the EIS must consider what this neighborhood will be at project completion, or it is not an honest study of the real world environmental setting. Depending on what you consider the surrounding area, these developments are increasing population density 28-31%.

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3. The developers are not using standard data collection procedures. When they didn't get the desired results by studying parking with .25 miles, they simply changed the parameters of the study to .5 miles! The parking study on pages 64-65 of the scoping document includes many mistakes and bad estimates. Even within the expanded .5 mile study areas, there are not 3,085 available parking spots:

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- The EIS should study blocks that will be most affected NOT currently included in the current scoping document - specifically Clinton Street north towards Grand Street, Essex Street, and Grand Street between Montgomery Street and Essex Street, many of which serve as approaches to the Williamsburg Bridge and are the major access points to and from the neighborhood.

6. There are many other factors that will be surveyed as part of the EIS not listed above yet are no less important including the over 1 million gallons of waste water the LSRD projects will generate each day. Our sewer system, when running at capacity, simply dumps waste into our already polluted waterways.

In summary, we need an honest study that will provide accurate results.

- **The LSRD does not exist in a vacuum. All aspects of the EIS should account for the 2,200 other new units not currently operational but set to open during the LSRD development timeline.**
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- **We must demand an objective and accurate EIS. It must look at our existing, real community - not one that only exists on paper and spreadsheets in the offices of luxury real estate developers and their high paid lobbyists and consultants.**

Thank you.

Sam Moskowitz

25 Montgomery Street #14E

NY, NY, 10002

Samuelmoskowitz@gmail.com

From: Samuel Moskowitz [mailto:samuelmoskowitz@gmail.com]

Sent: Tuesday, March 28, 2017 4:17 PM

To: Karnovsky, David <David.Karnovsky@friedfrank.com>; rdo Brus@planning.nyc.gov

Subject: Question re: Two Bridges LSRD Scoping Doc

Dear Mr. Dobruskin and Mr. Karnovsky:

Please tell me I'm reading something wrong here, but is this 2,775-unit development really being planned for a net loss of 4 parking spaces? I would love to hear why you think why you think -4, as indicated on table A-3 on Page 55 of the Scoping Doc, is an appropriate number of parking spots for a development of thousands of luxury units, whose occupants' demand will most likely exceed the 23% of Manhattanites that own cars.

In addition, the parking analysis in table 4 on Page 65 is deeply flawed for the following reasons:

1. The scoping document does not account for the fact that the vast majority of these parking lots are close to or at 100% of capacity for long-term parking. Many lots show availability, but only because the lot operators do not lease to capacity to maximize profits on short term daily rentals.
2. Site 11 indicated on Table 4 with 297 spots is Essex Crossing Site 3, which is set to close as a parking lot and will be developed as a residential development within the next few years. The extended parking area indicated on this map covers the Essex Crossing site but the scoping document does not take into account the increased parking demand from that 1,000-unit development.
3. Many of the smaller Chinatown lots are also prime development targets. Maybe not this year or next, but we all know these lots will not all remain parking lots for long and will soon go the way of our Manhattan gas stations...
4. The 250 South Street Development is including 110 parking spot for over 1,000 units (200 affordable, 800 market rate). These 100 spots do not alleviate the need for area parking but only increase demand, as it well below the demand indicated by the 23% of Manhattan residents who own cars.

Please, I would love to hear how wrong I am.....

Sincerely,
Sam Moskowitz

Dear Mr Dobruskin,

I am a lifelong resident of the Two Bridges neighborhood and am extremely appalled with these three massive developments. I share many concerns with my community about these projects but I would like to address noise and pollution in particular.

My quality life has already been affected by the ongoing construction to the facade of 275 South Street which is owned by L&M Development Partners. There have been various times where construction has started before the legal time of 7am (which is still a ridiculous time to start) and even on the weekends when they did not have an after-hours variance. Construction during valid work hours has been loud from the beeping and banging of machinery and vehicles. There also have been dumpster trucks that come between the hours of 3am-6am to change construction related dumpsters. My work hours are constantly shifting so I've endured many sleepless days and nights from the incessant construction noise at 275 South St.

I am extremely petrified about how our lives will be obstructed if construction on a small scale has been this incredibly disruptive. I understand that there is an environmental review that's being conducted to study the noise and pollution impacts but how accurate can the results be when construction has not even commenced? However, it is general knowledge that the construction of one building is extremely loud and causes excess pollution. The simultaneous excavation and construction of 3 high rises within a two block radius means 3X the noise and pollution. It will be catastrophically loud and devastating to our environment so mitigations need to be implemented to the highest degree. The mitigations that these developers have suggested are not sufficient. They recommended minimizing back up alarms on construction vehicles but that violates OSHA regulations. Erecting a sound barrier is futile for those who live above it. The addition of thousands of people and retail spaces to our neighborhood will lead to a permanent increase in noise and foot traffic. Drop off and pick up times for delivery and dumpster trucks must be addressed as well. These developers need to enforce sound proofing to the windows of existing buildings and provide air purifiers to all residents that are affected by these impending projects.

There is also a lack of communication among these developers already. I had voiced my concerns about the ground floor construction noise at 275 South St and received a response from the Two Bridges Development team saying the only work remaining was to the roof of that building. That information is completely erroneous as construction is still occurring on the ground floor. These development teams must be diligent with what is actually happening at their construction sites. If they want to maintain a relationship with the neighborhood they are intruding on, then they must be respectful to our community.

I thank you for your time and please confirm receipt of this email.

Thank you,
Margaret Moy

From: "Robert Dobruskin (DCP)" <RDOBRUS@planning.nyc.gov>
To: "Evan Lemonides (DCP)" <ELEMONIDES@planning.nyc.gov>, "Samuel Nourieli (DCP)" <SNOURIELI@planning.nyc.gov>, "Joel Kolkmann (DCP)" <JKOLKMANN@planning.nyc.gov>, "Xinyu Liang (DCP)" <XLiang@planning.nyc.gov>
Cc: "Erik Botsford (DCP)" <EBOTSFORD@planning.nyc.gov>, "Danielle J. DeCerbo (DCP)" <DDECERBO@planning.nyc.gov> Bcc:
Date: Tue, 30 May 2017 13:57:06 +0000
Subject: FW: Two Bridges Development

From: Oliver Newton [mailto:oliver@47canal.us] **Sent:** Thursday, May 25, 2017 1:01 PM
To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Cc: niouy@nyassembly.gov; squadron@nysenate.gov; Magaret Chin <chin@council.nyc.gov>; MBP Info <info@manhattanbp.nyc.gov>; MN CB 3 <info@cb3manhattan.org> **Subject:** Two Bridges Development

Dear Robert Dobruskin,

I am writing to voice my serious concerns and frustration regarding the development of the waterfront south of Clinton street. I am not able to attend today's sessions but want to make sure that my voice is heard.

As a small business owner in Chinatown for over 5 years I feel that no good faith concern has been paid to the local community and am deeply saddened by the contempt for which the developers and members of the city government seem to hold for this rich and amazing community of people. I saw this illustrated first hand and very clearly at several of the forums held by the developers over the last several months.

If we can not rely on our cities elected officials to step in and help preserve this essential vibrant and incredible community, what will the developers turn it into? It will ruin the fabric of one of the last affordable neighborhoods in lower Manhattan and inevitably business like mine will also fall victim to raising rents and displacement that so many in this neighborhood are now facing. I can not tell you how deeply this saddens me.

I would like to focus some of my concerns into the specific points below.

1. The developers are making claims about bus ridership and supported zero impact these projects will have. They have done no research to support these claims.
2. The developers are claiming this is not a sizable new neighborhood and are not proceeding with police and fire department capacity reviews. How does 2,775 new units not constitute a sizable new neighborhood? By CEQR standards this is absolutely considered a sizable new neighborhood when it comes to schools, libraries, health care facilities and child care facilities. Why not fire and police then?
3. The developers are not considering the totality of the neighborhood when considering the implications of change. 2,200 other units at Essex Crossing and 250 South Street are also in progress. Why is the study not looking into the compounded effects of all of these units that will be added to this community over the next 3 years in addition to the 2,775. That is ALMOST 6,000 new units. I demand that they study the actual community, not the one on paper that best serves the agenda of luxury developers.
4. According to the developers they are considering traffic and parking to be an additional barrier. Traffic and parking in this community is already at a near unmanageable amount. This is absolutely naive at best. Parking lots are full and already have month to years long waiting lists.
5. Sewage is a MAJOR issue! The developers claim this development will utilize over 1,000,000 gallons of water per day (not including the water required by the 2,200 other units previously mentioned). This community's system, when running at capacity, simply dumps waste into our already polluted waterways. In addition, what impact will this development have on our electrical grid and other infrastructure and utilities and the health of the area.
6. Most shameful of all the developers are not going to study the impact of this development on surrounding subsidized housing or secondary displacement, although it is directly surrounded by thousands of units of low income housing.

Best,

Oliver
Oliver Newton 47 Canal

291 Grand Street, 2nd Floor New York, NY 10002
(646) 415 - 7712
oliver@47canal.us
Wednesday - Sunday // 11a - 6p

Williy Pang

32 Monroe Street / Apt. 7A

New York, NY 10002

(212) 608-7844

Department of City Planning

Environmental Assessment Review Division

120 Broadway / 31st Floor

New York, NY 10271

Attn: Robert Dobruskin

June 5, 2017

Dear Mr. Dobruskin,

My name is Williy Pang, and I am a true native New Yorker – a rare species these days.

I was born and raised in Park Slope, Brooklyn long before it became the real estate juggernaut that it is now. Even though we disparagingly called it *Park Slop* back then (because it was a gang-ridden, drug-infested wasteland), the neighborhood helped instill within me a sense of values and morals that reinforced the daily diet of decorum and dignity that my family fed me. We didn't have much (and in the 1970s, not many people did), but we had each other – our neighbors, the neighborhood family-owned businesses, and a blue-collar work ethic that taught us to appreciate everything, and not expect anything, that came our way.

In 2004, I literally won the lottery to receive an apartment rental in Knickerbocker Village located in what is now known as the Two Bridges section of Lower Manhattan. I have been a resident here ever since.

As a result, I believe I am qualified to speak about the concerns that I have as my current neighborhood undergoes the same changes that I experienced with my former one.

My greatest concerns can be summed up into one term: PRESERVATION.

As the Two Bridges area undergoes its changes in the name of progress and profit with this current crop of new money, what becomes of the established medium and low-income families who were here long before these new developments were even considered possibilities in this neighborhood? Eventually what happens is the same that happened in Park Slope, longstanding residents are somehow displaced financially or severed emotionally from what they called *home* - in many cases generations of established families who lived through the best and worst that The City and this neighborhood had offer.

Lives were *invested* in this neighborhood.

For the people who will be living in these future “units,” their investment will be in their square-footage apartments – until their family *units* grow and they will need to find larger spaces, thereby moving out for the next set of buyers to replace them. It is a rather dispassionate trend in the name of *progress and profit*. It is also in stark contrast to the deep-rooted residents who have contributed to a cultural dynamic that is both unique and defining to the culture of Two Bridges. In this new context, rather than having a tight-knit community, revolving neighbors will never truly take root, and a sort of Dust Bowl Effect begins to occur.

My question is: How will both worlds - past and present, the Haves and Have-Nots, the Natives and the Carpetbaggers coexist in this *Brave New World* that is being created in our Two Bridges community?

Following this question comes a flood of community-based concerns:

- **Transportation:**

- **Public:**

- The volume of ridership on the F line at the East Broadway station will increase exponentially. What will be done about platform safety to accommodate the sheer volume of riders? Also, what will be done about the transients who have made the underground passageway between East Broadway and Madison Streets their shelter and an overall cesspool?

- **Private:**

- While there are many who now ride bikes, what about parking for those who own cars? Where will parking exist – for residents?

- **Sanitation:**

- With increased population comes increased garbage. How will sanitation be addressed for these new buildings? Also, garbage collection will also affect traffic flow and road rhythms in these already overcrowded streets. How will this issue be handled?

- **Schools:**

- With the anticipated volume that will come to the area, there will surely be a need for schools to accommodate elementary, middle, and high school students. What is going to be done about this?

- **Food Markets:**

- The Pathmark Supermarket that was originally at the site of one of the towers being erected today was the primary source of grocery shopping in our area. What will be done to accommodate food shopping - actually, affordable food shopping, for ALL residents in the area?

- **Recreation:**
 - There are currently benches that are scattered on the islands on Pike Street; exercise stations under the FDR Drive, and the skate park under the Manhattan Bridge. With the increase in population, what other public recreational facilities will be overhauled or developed to accommodate the masses?

- **Rental Properties:**
 - For the Have-Littles and Have-Nots, what measures will be put in place to ensure that we will not be uprooted as the result of future prospectors who see a larger *vision* of Two Bridges after these developments become realities?

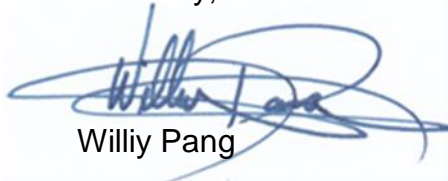
At the moment, these are the primary issues that I see stemming from these residential developments at Two Bridges.

I am the father of an eight-year old son. I would like to see him live, and enjoy, the life of a *true* Native Yorker, as I have.

Thank you for your efforts in addressing these matters.

I can be reached at the residence or telephone number on the letterhead.

Sincerely,



Williy Pang

Dept. of City Planning
Environmental Assessment Review Division
c/o Robert Dobruskin
120 Broadway, 31st Floor
New York, N.Y.10271
rdobrus@planning.nyc.gov

Dear Mr. Dobruskin

These comments are hereby submitted in writing and by email, in response to the Draft Scope of Work (dated March 27th) which has been submitted by the Developers of the Two Bridges EIS as part of the required Environmental Impact Statement for the six high end, high rise, 70 story MEGA towers proposed on South Street in lower Manhattan between Jefferson, Clinton and Cherry Street.

By way of background, I am Maggie Ramirez, a 59 year resident of this Lower East Side community. I was raised in the Valedeck Houses on Gouverneur Street, attended P.S.31, Corlears JHS 56 and Music and Art High School. My undergraduate degree is from Cornell University and I have a MPA from NYU. I have a very long and distinguished career in healthcare and was awarded an Honorary Doctors Degree from Dominican College. I moved into Mitchell Lama housing at 257 Clinton Street (now 275 South Street) in 1978, after graduating from Cornell University, before it was chic and cool to live on the Lower East Side. I have a strong commitment to this community and the residents who live here and am compelled to submit these comments which I hope will be incorporated into the EIS.

My comments below are submitted on behalf of the hundreds and thousands of Lower East Side residents who are opposed to this proposed development due its negative impact on our community. We are hoping NYC governmental officials will join forces and work together to preserve and protect this historic bastion of Old New York from inappropriate, inconsistent, unsafe, unnecessary and unhealthy development.

I submit these comments with hopes that there are individuals involved in this process who will have the courage, and judgment to see beyond the financial interests of the developers of these mega towers and instead consider and stand up for what is in the best interest of this community and the City of New York. The Real Estate industry in New York City has dramatically altered the skyline, housing type and population of New York City through the building of high-end unaffordable mega towers everywhere they can locate a vacant lot. It does not matter to them what it is doing to our City and to the people who help sustain this great City. This propose building project is part of an avalanche of Mega Towers that has engulfed Manhattan, dramatically altering the very fabric of NYC life and culture. Now that it is hitting the historic Lower East Side or the "Gateway of America", and perhaps some serious consideration will be given to whether these Towers are necessary, appropriate and in the best interest of this community.

The Lower East Side is the last bastion in Manhattan which has been spared gentrification and development. Unfortunately, real estate developers now have their radar focused on the Lower East Side and are determined to alter and permanently deface this small 3 block section of the Lower East Side because of its proximity to the waterfront. With the two mega towers already in construction, the end result will be six unaffordable, 70-story mega towers squeezed into a 3 block area of in lower Manhattan in an area designated as a 'High Risk flood zone". We are greatly alarmed and concerned about the potential impact this project will have on our safety and health. The congestion, traffic, health

threats, pollution, noise and danger which will be created for existing residents and future tenants is what we are hoping will be closely reviewed and considered and the necessity, viability and consistency of this project within the existing community. We support “sensible and appropriate development” and are therefore requesting this Mega Towers building project be sent back to the drawing board.

My comments regarding the Environmental Impact Statement are divided into 1) environmental impact/community character and 2) social policy:

1) ENVIRONMENTAL IMPACT/CONSISTENCY WITH COMMUNITY CHARACTER:

THE NE CORNER OF SOUTH & CLINTON STREET IS A DESIGNATED PARK:

The 70 story mega tower proposed on the NE corner of South & Clinton Street would be constructed on a parcel which was committed by the NYC Environmental Protection Agency to be restored as the Land's End children/ Tenants Park. The Park was temporarily taken from the tenants, while the NYCEPR used it as a staging and excavation area for work required on the NYC Water Tunnel which is adjacent and also situated on the property. Design Plans for the new park were presented to the Land's End Tenants Association and a commitment made to return the space to its original purpose. We are requesting the commitment made by the NYCEPA to the Land's End Tenants Association be honored and the parcel developed as originally designed and intended.

NYC WATER TUNNEL #1 (285 South Street):

As stated above, the NE corner of South & Clinton Street is home to an existing 1 story NYC owned building structure which maintains and operates the NYC water Tunnel #1 which dates back 100 years. We question whether the proposed construction would not in fact be potentially disruptive to the operations of this water tunnel given the extent of excavation and drilling which has to occur in such close proximity to this century old structure and the naturally wet topography of the area. Will construction undermine the water pipes and water pumping system/station located at this site? Does it present a safety risk for all those potentially affected by this service? The purpose of this tunnel, the requirements for its ongoing operations and the impact the proposed adjacent 70 story mega tower (259 Clinton Street) could potentially have on this structure and the tunnels below are issues we believe need to be closely examined and determined.

GAS STATION ON THE NE CORNER OF SOUTH & CLINTON STREET:

Prior to the construction of 257 Clinton (aka 275 South Street) in 1977, a very large gas station catering to tractor trailers and commercial vehicles operated on the NE section of South and Clinton Street. One of the proposed mega towers (259 Clinton Street) is to be built directly on the site where the Gas Station operated at. We are concerned whether it will be safe to disturb the underlying soil at this site given its prior function. Were petroleum tanks left underground? Is there petroleum leakage underground and will this construction disturbed that which has been dormant for over 40 years? The history of the prior Gas station, its demolition and disposal of its hazardous materials including the tanks are issues which we believe need be reviewed and assessed in order to determine the safety of unearthing soil at this location which is only feet away from our home 257 Clinton (aka 275 South Street).

FLOOD ZONE A:

There are a host of environmental and social policy reasons why this proposed building project is inappropriate, unsafe and should be rejected. One of the most significant concerns is that the entire scope of the proposed building project with its six 70- story Mega towers will be built on land which has been designated by FEMA and the New York City Emergency Management Agency as in an EXTREMELY HIGH RISK FLOOD ZONE known as Zone A. Per the NYCEMA, " residents in Zone A face the highest risk of flooding from hurricane storm surges". During Hurricane Sandy lower Manhattan, and this community, was hard hit by the rising East River surge severely flooding the area and causing significant property damage. Many sections in lower Manhattan, and this community, which are all part of Zone A, are still recovering from the damaged caused in 2011. The effects of continued storm surges can be seen today throughout the entire waterfront. It therefore seems ludicrous, irresponsible, dangerous and an abdication of civic duty to knowingly and deliberately approve construction of six 70 story Mega Towers in a known high risk flood zone. Does not real estate property law require the seller to disclose all facts known to materially affect the value or desirability of property and if a property is in a known high risk flood zone is there not an obligation to communicate this information to buyers (those purchasing condos) of said property? More importantly however, why would the City of New York willfully allow a developer to endanger the lives of 6,000 innocent people and knowingly place them in harm's way? Furthermore, with so many new empty high rise mega towers in in NYC, why would NYC officials find it necessary to approve yet another nonessential, high density mega tower in an area clearly not designed to safely support the intended residents? Will raising the lower floors of the 6 mega towers truly address all the safety concerns of the 6,000 tenants who will be living above? Extreme changes in the weather, hurricane patterns and major flooding is a new reality for our country and New York City. Ignoring the designation of a high risk flood zone and allow the building of unnecessary mega towers will not make the threats go away and would be a serious dereliction of civic duty if allowed and permitted. The developers plan to build, sell and leave. How can the City justify the approval of "new" construction of high density mega towers given the known and increasing risks to all the people who will be added to Zone A?

STRUCTURAL INTEGRITY OF 257 CLINTON (AKA 275 SOUTH STREET)

257 Clinton Street (aka 275 South Street) is now over 40 years old and is the only modular building of its kind built in Manhattan during the 1970s. Unlike most of the housing stock in New York City of this era and time period, this building was built elsewhere and transported to the site. Large concrete slabs were delivered and hoisted by crane with mortar added to hold the slabs together. It is a prefab building constructed like a puzzle. No other construction of this type followed after its original construction in the mid-1970s. I speak on behalf of the many longtime residents in the building who are very fearful and have very grave concerns about the integrity of the building and its ability to withstand the deep excavation, heavy drilling, pounding, constant construction and vibrations that will be generated in order to construct the mega tower which is proposed "directly" adjacent to our structure at 257 Clinton Street (aka 275 South Street). We have had long history of cracks in this building which have appeared over time and with what appears to be rattling and vibrations throughout the entire building which escalates whenever any kind of construction work is performed. We demand a detail assessment, given the unique construction of the building and our personal observations over time, as to whether 257 Clinton Street (aka 275 Clinton Street) is structurally sound and able to withstand and endure all the major construction activity that is proposed directly adjacent to this structure. We are deeply concerned about the proximity of the proposed new 70 story Mega Tower to our building, the NYC Water Tunnel and South Street and whether construction at this site will be safe for all of the reasons above.

This grave concern is shared by all the longtime residents and the new market rate tenants who are only now becoming aware of the issue now that they are living in the building. We fear for our lives if these projects are approved as we do not believe our building can sustain the constant pounding, vibrations, deep drilling and excavation for the construction of a Mega Tower which will be directly attached to our building at 257 Clinton Street (aka 275 South Street).

PROPOSED HEIGHT, DESIGN and NUMBER OF MEGA TOWERS PROPOSED;

Neither the height nor the design of the proposed Mega Towers is in keeping with the Community fabric and character of the Lower East Side. We invite everyone to walk through the Lower East Side and personally observe how this community is different from any other in Manhattan. In response to the terrible earlier reputation of the Lower East Side as a section of the City of unsanitary and impoverished conditions, the Lower East Side has evolved into a habitable and desirable community of well-spaced buildings, parks, inner courts yards and moderate height buildings. As you walk through Madison, Cherry, Montgomery, Clinton, Rutgers, Pike Street, East Broadway or Grand Street, you will observe ALL the housing stock in this part of Manhattan was planned and constructed so buildings are well spaced apart with plenty of land and common outdoor living space in between buildings. This is true whether it is the New York City Housing Authority (Valedecks) or the middle class housing of Gouverneur Gardens or the Seward Park Cooperatives. The institutions in the neighborhood also were similarly design including the public schools and Gouverneur Hospital. We are pleased that Essex Crossing, the new planned mixed use development currently under construction on the Lower East Side has been designed and is being built in keeping with this long standing Lower East Side tradition. Planned buildings are of a moderate height and consistent with the housing stock in the neighborhood and ample space is provided between buildings. This raises one of the most significant objections to this project and that is the unsettling, inappropriate and bizarre height of the proposed Mega Towers. While we understand it is lucrative for the developers to gain as much profit as possible for their investment by building as high as possible, this is not in the best interest of this community, is completely unnecessary and inconsistent with the housing stock of this community. Mega Towers are being built all over New York City, are all unaffordable for the common New York City resident and add an element of danger and safety issues simply because of the abnormal height. Please note, the proposed Mega Towers are being squeezed in an area that was carefully planned to provide adequate spacing and living space between buildings to create a livable community. We strongly and adamantly object to the proposed height of these Mega Towers and the attempt to squeeze them into spaces that alter the unique and habitable nature of our community and object to the malicious intent to alter the use of "open" space. We must resist the current obsession to stick a high rise mega Tower wherever there is not already one on it. This is not sound social policy, is altering the very fabric of New York City life and creating dangerous and safety concerns giving the abundance of Mega Tower construction New York City. We should have the right to maintain a community consistent with the current housing stock which maintains the open space which we treasure and value. We also are entitled to a decent quality of life. Packing 6 mega Towers in this small corner of the lower east Side is unnecessary, extremely disruptive, unsafe and creates more problems than it solves.

TRAFFIC & CONGESTION:

The elevated FDR highway sits directly above in front of the proposed project and is always busy and noisy with traffic. South Street also becomes bogged down with overflow traffic from the FDR Highway. When the traffic builds up on the southern portion of the FDR, drivers will typically get off on South Street and attempt to bypass the highway creating on a daily basis a long line of traffic from

Montgomery Street down to the South Street Seaport. South Street is bogged down and congested, not only from the overflow of traffic from the FDR, but also by all the other commercial traffic which is housed on or parks on South Street. Emergency Medical Services and the New York Fire Departments maintain vehicles on Clinton and South Street at Pier 35. Likewise, the NYC Sanitation Department (Pier 35) houses multiple sanitation vehicles at this site and often use the Pier as a staging area for numerous Sanitation weather emergencies, City events/ activities and City related emergencies which brings all types of large sanitation vehicles into the area. During the winter, Pier 35 becomes a major hub for sanitation snow trucks with plows that run 24/7. Sanitation trucks EMS and NYFD vehicles are constantly coming in and out of Pier 35 onto South Street. Additionally South Street between Clinton & Pike Street are used by numerous MTA commuter buses and other private commercial buses as a lay-over where buses are kept idling for hours while blocking access to and from the existing residential buildings located on South Street. The addition of Pier 36 (299 South Street) and the NYC Cruise Boats on South and Montgomery Street now boasts 700,000 visitors a year which also brings additional taxis, Ubers, cars and NYC Tour buses to the area often creating dangerous conditions for the visitors and tourists waiting on south street to enter Pier 36. Finally, there are all the construction vehicles which often line South Street in the morning and during the night for the Extell development at 250 South Street, the 80 story luxury condo Mega Tower currently under construction. How would additional construction vehicles, traffic and cranes possibly be accommodated on South Street given its current use as overflow for FDR traffic, Sanitation, EMS, NYFD, NYC Sanitation, Pier 36 events and Cruise Service, MTA commuter and private commercial buses? South Street at different times of the day is gridlock with traffic making it difficult for even Sanitation and NYFD to have unobstructed and free access into and out of Pier 35. South Street will be unable to accommodate the additional traffic and vehicles associated with building yet another 4 Towers. Contingency for operating and delivering materials during the off hours and late night hours is extremely disruptive to the tenants who live in the area and unacceptable. South Street simply is unable to bear the additional heavy construction traffic given current congestion, traffic patterns and use. Furthermore, the addition of 6,000 residents on this small 3 block section of lower Manhattan would create a permanent unsustainable traffic jam and unsafe street conditions on a street which is used more as a highway than a residential street.

NOISE & AIR QUALITY:

When 257 Clinton Street (aka 275 South Street) was constructed in 1977, the City required air-conditioning units for the apartments facing the FDR Drive. This was due to the acknowledgement that carbon dioxide from the constant traffic of cars on the FDR was an unhealthy byproduct and tenants needed to protect themselves the best they could. It is also necessary to be able to close windows in order to drown out as much of the traffic noise as possible which is nonstop and 24/7. Living in front of a highway is not exactly as pleasant as those who seek the waterfront in lower Manhattan may think because of the presence of the elevated highway. Unfortunately the current landlord of our building is also unwilling to replace the air conditioners leaving tenants in a quandary as these air conditioners are specifically designed for window slots which are not commercially available. Noise and air quality has always been an issue making air conditioning a necessity, not an option. With the growth in traffic, air quality is worse, creating constant dust in apartments, even with the windows closed. The noise, dust and air quality problems that will be generated and created when adjacent construction begins is unimaginable. Not only will we be faced with the fear of construction and its potential effect on the structure of our building but we will be forced to live with constant construction dust, pounding, vibrations and noise only feet away from our bedroom and living room window. These conditions will undoubtedly create a breathing and health nightmare. Will we be provided with high quality air

conditioners to offset breathing in the unhealthy air and dust? Will we have to run the air-conditioners 24 hours day? How will we be to afford the significant Con Ed bills that will result?

2) Social Policy Housing Concerns:

Recent articles in the New York Times and the Wall Street Journal indicate that many of the high end mega Towers under construction are targeted and marketed to wealthy foreign buyers, NOT New Yorkers, but businessmen from China, Eastern Europe, Russia and other international destinations. These properties are considered assets and a safe investment and clearly not for people who have an interest or loyalty to New York City, its people or community. We need people who want to live and work in New York City but they also have to be able to afford it. The Extell Development, Mega 80 story Tower currently under construction on South & Pike Street is no different and is actively being marketed to wealthy businessman in Asia. There is no illusion this is intended for local everyday new Yorkers. The high end Mega Tower markets targeted to wealthy “non- New Yorkers” are looking for an investment, write off and safe haven. The growth in high end housing has tragically altered the population of New York City potentially leaving it without the infrastructure and labor needed to support its massive operations given the millions of people who need to reside in NYC. This has been made dramatically worse by the City’s decision to allow the conversion of many valuable Mitchell lama properties that were built with federal and state funding to “market rate housing” as 257 Clinton Street (aka 275 South Street) was. Huge developments that were constructed in New York City for veterans and middle class families (Independence Plaza, Stuyvesant Town, Seward Park Cooperatives to name a few) have left leaving a huge vacuum in New York City for the bulk of its resident income earners. 34% or over a third of Mitchell Lama units (22,688 units) have been lost. Housing for the labor force of New York City (Doormen, Cooks, Janitors, Police, Nurses, Firemen, Ambulance Drivers, etc. is nonexistent in Manhattan. The offering of new middle class housing is pale in comparison to what has been lost. As the “Gateway to America”, the Lower East Side was home to many new immigrants coming to America with hopes of achieving the American dream. Whether it was Italians, Germans, Irish, European Jews, Greeks, Poles, Romanians Slovaks, Ukrainians Puerto Ricans or Chinese, all arrived with the hope for a better life in America. There are many celebrities who take pride in the fact that their families arrived poor in New York but with hard work and opportunity they made it. Whether it was Ben Stiller, Rudy Giuliani, Robert Di Niro, Billy Crystal or Donald Trump, their American heritage rests on their families ability to migrate to New York, find housing, employment and seek opportunity, if not for themselves but for their children. Frank Sinatra sang that “if you can make it here, you can make it anywhere”. The way real estate development is evolving in New York however, the hope and opportunity New York City was known for is quickly disappearing. The Lower East Side today remains an economically and ethnically diverse community. The Two Bridges Project is wrought with environmental problems and inconsistent with the character of this neighborhood. We plead that you find the courage to stop the avalanche of these unnecessary high end mega Towers and instead work with our community to preserve what has been an inspiration for so many for so long. This represents an opportunity to do what is right and in the best interest of this community, this great Cit and the community which was known as the “Gateway of America.

Thank you for the opportunity to submit these comments. We hope you will give them you utmost consideration in finalizing the EIS for the Two Bridges Project. Please feel free to contact with me if there are any questions.

Maggie Ramirez (Maggieramirez212@gmail.com)

<http://www.twobridgeseis.com/projects>

Dept. of City Planning
Environmental Assessment Review Division
c/o Robert Dobruskin
120 Broadway, 31st Floor
New York, N.Y.10271
rdobrus@planning.nyc.gov

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By way of background, I am Maggie Ramirez, a 59 year resident of this Lower East Side community. I was raised in the Valedeck Houses on Gouverneur Street, attended P.S.31, Corlears JHS 56 and Music and Art High School. My undergraduate degree is from Cornell University and I have a MPA from NYU. I have a very long and distinguished career in healthcare and was awarded an Honorary Doctors Degree from Dominican College. I moved into Mitchell Lama housing at 257 Clinton Street (now 275 South Street) in 1978, after graduating from Cornell University, before it was chic and cool to live on the Lower East Side. I have a strong commitment to this community and the residents who live here and am compelled to submit these comments which I hope will be incorporated into the EIS.

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This grave concern is shared by all the longtime residents and the new market rate tenants who are only now becoming aware of the issue now that they are living in the building. We fear for our lives if these projects are approved as we do not believe our building can sustain the constant pounding, vibrations, deep drilling and excavation for the construction of a Mega Tower which will be directly attached to our building at 257 Clinton Street (aka 275 South Street).

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TRAFFIC & CONGESTION:

The elevated FDR highway sits directly above in front of the proposed project and is always busy and noisy with traffic. South Street also becomes bogged down with overflow traffic from the FDR Highway. When the traffic builds up on the southern portion of the FDR, drivers will typically get off on South

Street and attempt to bypass the highway creating on a daily basis a long line of traffic from Montgomery Street down to the South Street Seaport. South Street is bogged down and congested, not only from the overflow of traffic from the FDR, but also by all the other commercial traffic which is housed on or parks on South Street. Emergency Medical Services and the New York Fire Departments maintain vehicles on Clinton and South Street at Pier 35. Likewise, the NYC Sanitation Department (Pier 35) houses multiple sanitation vehicles at this site and often use the Pier as a staging area for numerous Sanitation weather emergencies, City events/ activities and City related emergencies which brings all types of large sanitation vehicles into the area. During the winter, Pier 35 becomes a major hub for sanitation snow trucks with plows that run 24/7. Sanitation trucks EMS and NYFD vehicles are constantly coming in and out of Pier 35 onto South Street. Additionally South Street between Clinton & Pike Street are used by numerous MTA commuter buses and other private commercial buses as a lay-over where buses are kept idling for hours while blocking access to and from the existing residential buildings located on South Street. The addition of Pier 36 (299 South Street) and the NYC Cruise Boats on South and Montgomery Street now boasts 700,000 visitors a year which also brings additional taxis, Ubers, cars and NYC Tour buses to the area often creating dangerous conditions for the visitors and tourists waiting on south street to enter Pier 36. Finally, there are all the construction vehicles which often line South Street in the morning and during the night for the Extell development at 250 South Street, the 80 story luxury condo Mega Tower currently under construction. How would additional construction vehicles, traffic and cranes possibly be accommodated on South Street given its current use as overflow for FDR traffic, Sanitation, EMS, NYFD, NYC Sanitation, Pier 36 events and Cruise Service, MTA commuter and private commercial buses? South Street at different times of the day is gridlock with traffic making it difficult for even Sanitation and NYFD to have unobstructed and free access into and out of Pier 35. South Street will be unable to accommodate the additional traffic and vehicles associated with building yet another 4 Towers. Contingency for operating and delivering materials during the off hours and late night hours is extremely disruptive to the tenants who live in the area and unacceptable. South Street simply is unable to bear the additional heavy construction traffic given current congestion, traffic patterns and use. Furthermore, the addition of 6,000 residents on this small 3 block section of lower Manhattan would create a permanent unsustainable traffic jam and unsafe street conditions on a street which is used more as a highway than a residential street.

NOISE & AIR QUALITY:

When 257 Clinton Street (aka 275 South Street) was constructed in 1977, the City required air-conditioning units for the apartments facing the FDR Drive. This was due to the acknowledgement that carbon dioxide from the constant traffic of cars on the FDR was an unhealthy byproduct and tenants needed to protect themselves the best they could. It is also necessary to be able to close windows in order to drown out as much of the traffic noise as possible which is nonstop and 24/7. Living in front of a highway is not exactly as pleasant as those who seek the waterfront in lower Manhattan may think because of the presence of the elevated highway. Unfortunately the current landlord of our building is also unwilling to replace the air conditioners leaving tenants in a quandary as these air conditioners are specifically designed for window slots which are not commercially available. Noise and air quality has always been an issue making air conditioning a necessity, not an option. With the growth in traffic, air quality is worse, creating constant dust in apartments, even with the windows closed. The noise, dust and air quality problems that will be generated and created when adjacent construction begins is unimaginable. Not only will we be faced with the fear of construction and its potential effect on the structure of our building but we will be forced to live with constant construction dust, pounding, vibrations and noise only feet away from our bedroom and living room window. These conditions will undoubtedly create a breathing and health nightmare. Will we be provided with high quality air

conditioners to offset breathing in the unhealthy air and dust? Will we have to run the air-conditioners 24 hours day? How will we be to afford the significant Con Ed bills that will result?

2) Social Policy Housing Concerns:

Recent articles in the New York Times and the Wall Street Journal indicate that many of the high end mega Towers under construction are targeted and marketed to wealthy foreign buyers, NOT New Yorkers, but businessmen from China, Eastern Europe, Russia and other international destinations. These properties are considered assets and a safe investment and clearly not for people who have an interest or loyalty to New York City, its people or community. We need people who want to live and work in New York City but they also have to be able to afford it. The Extell Development, Mega 80 story Tower currently under construction on South & Pike Street is no different and is actively being marketed to wealthy businessman in Asia. There is no illusion this is intended for local everyday new Yorkers. The high end Mega Tower markets targeted to wealthy “non- New Yorkers” are looking for an investment, write off and safe haven. The growth in high end housing has tragically altered the population of New York City potentially leaving it without the infrastructure and labor needed to support its massive operations given the millions of people who need to reside in NYC. This has been made dramatically worse by the City’s decision to allow the conversion of many valuable Mitchell lama properties that were built with federal and state funding to “market rate housing” as 257 Clinton Street (aka 275 South Street) was. Huge developments that were constructed in New York City for veterans and middle class families (Independence Plaza, Stuyvesant Town, Seward Park Cooperatives to name a few) have left leaving a huge vacuum in New York City for the bulk of its resident income earners. 34% or over a third of Mitchell Lama units (22,688 units) have been lost. Housing for the labor force of New York City (Doormen, Cooks, Janitors, Police, Nurses, Firemen, Ambulance Drivers, etc. is nonexistent in Manhattan. The offering of new middle class housing is pale in comparison to what has been lost. As the “Gateway to America”, the Lower East Side was home to many new immigrants coming to America with hopes of achieving the American dream. Whether it was Italians, Germans, Irish, European Jews, Greeks, Poles, Romanians Slovaks, Ukrainians Puerto Ricans or Chinese, all arrived with the hope for a better life in America. There are many celebrities who take pride in the fact that their families arrived poor in New York but with hard work and opportunity they made it. Whether it was Ben Stiller, Rudy Giuliani, Robert Di Niro, Billy Crystal or Donald Trump, their American heritage rests on their families ability to migrate to New York, find housing, employment and seek opportunity, if not for themselves but for their children. Frank Sinatra sang that “if you can make it here, you can make it anywhere”. The way real estate development is evolving in New York however, the hope and opportunity New York City was known for is quickly disappearing. The Lower East Side today remains an economically and ethnically diverse community. The Two Bridges Project is wrought with environmental problems and inconsistent with the character of this neighborhood. We plead that you find the courage to stop the avalanche of these unnecessary high end mega Towers and instead work with our community to preserve what has been an inspiration for so many for so long. This represents an opportunity to do what is right and in the best interest of this community, this great Cit and the community which was known as the “Gateway of America.

Thank you for the opportunity to submit these comments. We hope you will give them you utmost consideration in finalizing the EIS for the Two Bridges Project. Please feel free to contact with me if there are any questions.

Maggie Ramirez (Maggieramirez212@gmail.com)

<http://www.twobridgeseis.com/projects>

From: michelle rosenberg [<mailto:michelle.rosenberg@gmail.com>]

Sent: Thursday, June 08, 2017 1:54 AM

To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>

Cc: Magaret Chin <chin@council.nyc.gov>; niouy@nyassembly.gov; MBP Info <info@manhattanbp.nyc.gov>; squadron@nysenate.gov; MN CB 3 <info@cb3manhattan.org>

Subject: RE: Public Scoping Meeting for Two Bridges LSRD

To The New York City Department of City Planning,

I am a resident of the Seward Park Coops in the Lower East Side and I am writing to say that the Two Bridges skyscrapers proposed for the Lower East Side waterfront will have a terrible and irreversible impact on my neighborhood and on my family's quality of life. Why is this proposal not being treated as a "major modification"?

I already live with the constant dust and sound of construction, with the extra emissions from the additional traffic on Clinton Street, with the danger of construction debris or accidents while walking my children to school. Our neighborhood is already about to take on thousands of additional residents from the Essex Crossing development, but before that has even completed, before we have even tested the capacity of this area to absorb a huge new development, 4 new mega towers are being proposed a few blocks away.

If Two Bridges mega towers are allowed to be built, it will effectively double the population of this area. But will we get additional schools? Will our infrastructure be repaired? Will our utilities be upgraded? Will our

crowded buses become more frequent? Will our parking spaces be increased? Will our traffic problems get resolved? I assume the answer is no. All the things I've just listed will instead become worse, over crowded and overburdened. If the developers even address these issues, how will they be held accountable?

I lived here during Sandy, and I know our area is already vulnerable to storms and floods. How is increasing the population of a "high risk flood zone" by thousands of people possibly be a good idea? How many tax dollars will it take to rescue the residents of these mega towers when the next flood comes? Tax dollars not contributed by these residents as they will probably receive a nice property taxes abatement.

And lastly, it's clear that our neighborhood and neighbors won't survive the influx of so many wealthy market-rate tenants. The Lower East Side is the most diverse neighborhood in Manhattan. It houses a harmonious mix of ethnicities, religions and cultures not found anywhere else with this density . How could this city be so short sighted as to allow the potential destruction of this special condition?

Please don't allow our neighborhood to be destroyed! Please do something to stop these outrageous out-of-scale developments.

Sincerely,

Michelle Rosenberg
Artist, mother, LES resident.

--

michelle rosenberg
www.michellerosenberg.com

Date: June 8, 2017

To: Robert Dobruskin
Director
Environmental Assessment and Review Division
New York City Department of City Planning

Re: Comments on Two Bridges LSRD Draft Scope of Work

From: Jim Shelton and Renae Widdison

Dear Mr. Dobruskin:

We appreciate the opportunity to submit comments in response to the Draft Scope of Work for the Draft Environmental Impact Statement (DEIS) for the Two Bridges Large Scale Residential Development (LSRD).

We further appreciate the decision by the Department of City Planning to require a combined EIS to examine the three proposed developments within the Two Bridges LSRD and to consider their cumulative impacts. However, we have considerable concerns about the implications of these projects' environmental impacts on the surrounding area, the insufficiency of the proposed Draft Scope of Work to evaluate these impacts, as well as the long-term procedural impacts of the Two Bridges LSRD environmental review process.

Concerns

Excessive Environmental Impacts

We are very concerned about the impact that 2,775 new dwelling units (DUs) will have on the physical infrastructure and social fabric of the surrounding area, particularly considering that over 2,000 of those DUs (72 percent) will be market-rate. To contextualize the scale of this potential impact, the City Environmental Quality Review (CEQR) Technical Manual establishes a threshold of only 200 new DUs to require an assessment of the indirect residential displacement impacts a project may induce. The introduction of over 2,000 market-rate DUs to the Two Bridges LSRD is inconsistent with the development's original stated objective of "providing low-, moderate-, and middle-income housing."¹ The addition of more than 2,000 market-rate DUs to a primarily low- and middle-income neighborhood will likely result in

¹ New York City Planning Commission, "CEQR #12DCP157M," May 2013, <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/eas/12dcp157m_eas.pdf>

considerable indirect residential displacement. Moreover, the addition of over 2.8 million gross square feet (gsf) of new development space by the estimated build year of 2021, all with heights above 700 feet, represents a scale and rate of development that is neither contextual within, nor appropriate for, the character of the surrounding area.

Insufficient Scope of Work

We are particularly concerned with the potential for the current Draft Scope of Work to underestimate indirect residential displacement impacts. The Draft Scope of Work proposes an insufficient geographic scale for assessment, limited to a 0.25-mile study area. While the CEQR Technical Manual requires a project have a minimum population increase of 5 percent to trigger the expansion of the study area to 0.5-miles, the unique geography, infrastructure, and socioeconomic conditions of the area surrounding the proposed projects necessitates an expanded study area regardless of population impacts.

The Draft Scope only proposes to analyze current market rate rent levels in its assessment of indirect residential displacement impacts, though the area surrounding the proposed projects includes a large number of rent regulated and publicly subsidized DUs, many of which have been facing deregulation and conversion to market-rate cooperatives. Additionally, there have been a large number of documented evictions and reports of tenant harassment in the surrounding area.² With this in mind, the limiting of the assessment to only unregulated units would result in a significant undercount of a population vulnerable to indirect displacement.

We also identify a troubling potential for the EIS to avoid a full, detailed analysis of indirect residential displacement if the study area is deemed to have “already experienced a readily observable trend toward increasing rents,” and are concerned this may result in a lack of appropriate recommendations for the mitigation of potential significant adverse impacts.

Adverse Precedent for Future Environmental Review

The proposed development has been deemed by the Department of City Planning (DCP) to comply with the underlying zoning district regulations for the development sites, contingent on the approval of three separate “minor modifications” to the existing LSRD by the City Planning Commission (CPC). Considering the large scale of the proposed projects and the aforementioned environmental impacts, we are concerned that the discretionary approval of the requests for minor modifications is not consistent with the spirit of the Two Bridges LSRD and the original Two Bridges Urban Renewal Area (URA) development objective of “providing well designed low, moderate, and middle income housing.”

Similarly, while we recognize that the approval of the requests for “minor modifications” to the

² Between 2013 and 2015, Two Bridges Tower (82 Rutgers Slip) alone saw 135 evictions. See <https://projects.propublica.org/evictions> for details.

Two Bridges LSRD complies with the letter of the law, we do not feel these approvals are consistent with the spirit of the Uniform Land Use Review Process (ULURP) and CEQR. We have grave concerns about the precedent this may establish for future large scale development projects to avoid robust environmental review through ULURP.

Recommendations

Due to the unique conditions in the Two Bridges area, the non-contextual scale of the proposed projects, the likely negative impacts on the neighborhood, the limited opportunities for meaningful community input, and the potential for long-term, negative impacts for New York City's environmental review procedures, we feel the DEIS should include a considerably more detailed and comprehensive level of review than is currently being proposed. With a particular focus on the indirect residential displacement impacts these projects are likely to induce, we recommend the following:

A. Expand the Study Area and Consider an Irregular Study Area

Neither the 0.25-mile study area radius, nor the radial study area shape are sufficient. The presence of the East River, proposed residential developments at 252 South Street (One Manhattan), 45 Rutgers Street (NextGeneration NYCHA), and 145 Clinton Street (Essex Crossing), as well as a number of nearby soft sites and plots with underbuilt FAR³, all suggest that at minimum the study area should be expanded to 0.5-miles to accommodate the larger amount of vulnerable residents and DUs that would be left out of a 0.25-mile study. An irregular study area parameter that conforms to real neighborhood boundaries, significant streets, and accounts for public transportation hubs and areas of concentrated housing must be considered as well. We recommend as more appropriate study area boundaries the East River to the south/southeast, the Manhattan Bridge to the west, Bowery to the west/northwest, and Delancey Street to the north/northeast.

B. Expand the Characteristics and Techniques Considered for Assessment of Indirect Residential Displacement

The "Detailed Analysis Techniques for Indirect Residential Displacement" outlined in the CEQR Technical Manual (Section 332.1) indicates that "depending on the proposed project in question, characterizing existing conditions...may require consideration of additional data sources, interview, surveys, and fieldwork." We assert that the proposed projects represent a case in which additional data sources, interviews, surveys, and field work are necessary to sufficiently evaluate the environmental impacts.

Specifically, we recommend that DCP include in the evaluation of the study area the following:

³ See "Map 5-9 and Map 5-10" in *Preserving Affordability and Authenticity*, Pratt Center for Community Development, 2013.

- Current Race/Ethnicity composition of the neighborhood, and trends in demographic change, if any.
- Current foreign born population, and trends in foreign born population change, if any.
- Current rates and trends of rent burden
- Current rates and trends for overcrowding
- Tenant harassment methods, rates, and trends
- Recent eviction rates and trends
- Soft site analysis of potential development sites, including those with significantly underutilized FAR
- A robust real estate market study, including:
 - Trends in new residential and commercial development
 - Property value change
 - Median rent change
 - Qualitative interviews with real estate brokers and tenants organizers about development patterns, rental market trends, and indirect residential displacement pressures in the Two Bridges neighborhood.

Much of this is already called for under “future no-action condition” analysis requirements in Section 332.1 of the CEQR Technical Manual, but it must be comprehensive and include the insight of community members and the real estate sector, who can provide details such as how much rent area landlords can expect to receive for a given unit after investment like this takes place.

C. Include Significant Current and Planned Future Developments in the Assessment

While we appreciate the combined Two Bridges LSRD EIS and the consideration of the cumulative impacts of the three proposed development projects, the combined EIS should be expanded to include the indirect residential displacement impacts of several current and planned developments nearby. The developments that should be added to the EIS evaluation include, but are not limited to:

- One Manhattan Square (Extell Development Company, 252 South Street, 815 new DUs)
- Proposed NextGeneration NYCHA infill development (LaGuardia Houses, 45 Rutgers Street, unknown number of units)
- Essex Crossing development (Delancey Street Associates, 145 Clinton Street, (+/- 1000 new DUs)

All of these projects fall within 0.5-mile radius of the Two Bridges LSRD, and when considered cumulatively, will contribute to a far larger number of new DUs and residents than the current scope would account for, necessitating a detailed assessment of indirect residential

displacement impacts (as well as other impacts), as defined by the CEQR Technical Manual. The presence of 2,775 new DUs to the Two Bridges area alongside these approximately 2,000 additional DUs in the surrounding area will undoubtedly exacerbate the rate and scale of neighborhood change and the Two Bridges LSRD must be evaluated in light of these developments.

D. Evaluate All Existing Housing for Indirect Displacement Impacts

Section 322.1 of the CEQR Technical Manual states that “generally, an indirect residential displacement analysis is conducted only in cases in which the potential impact may be experienced by *renters living in privately held units unprotected by rent control, rent stabilization, or other government regulations.*” For the Two Bridges neighborhood in 2017, this methodology is irresponsible, as it is widely reported that renters in stabilized, regulated, or controlled units can and do experience harassment and displacement in neighborhoods that are seeing significant socioeconomic shifts.

Many of these protected units are vulnerable to the loss of their protected status through the ongoing expiration of affordability program terms, as well as rental decontrol and destabilization resulting from vacancies, high-rents, and renovation costs. In co-ops where residents have actively chosen to participate in rent regulation, but have the choice to opt out (such as Mitchell-Lama buildings), rising market values in the surrounding area represents a direct pressure on tenants to consider market-rate conversions, contributing to an overall loss of protected units and resulting in indirect residential displacement. The residents of these units are not insulated from indirect displacement pressures and the potential loss of these affordable units in Two Bridges contributes to an overall loss of protected, affordable DUs throughout the city.

All rental housing should be considered potentially threatened by the massive imposition of new market-rate units in the neighborhood. Median household income, income source, age, and race/ethnicity should be used to assess indirect displacement vulnerability regardless of existing regulation status of a DU. We urge the lead agency to expand the analysis to include all renters and rental DUs in the study area.

E. Evaluate the Chinatown Working Group Plan as an Alternative

Community groups have established a preferred development plan for Two Bridges and the surrounding neighborhoods. This plan was a several year-long, community driven effort, included input from a wide range of stakeholders, and considered the unique cultural and socioeconomic conditions of these neighborhoods. The CEQR analysis should evaluate the Chinatown Working Group Plan, particularly the plan for Subdistrict D, as a viable and readily implementable development alternative and compare impacts on the neighborhood between it and the current Two Bridges LSRD proposals.

F. Disclose the Details of the Discretionary Approval of the Requests for “Minor Modifications” to the Two Bridges LSRD and Initiate a Full ULURP

We recommend the disclosure of the rationale behind the approval of the requests for “minor modifications” to the Two Bridges LSRD in the face of significant evidence that the anticipated environmental impacts will be considerably large and constitute changes to the surrounding area that would necessitate more formal and extensive environmental review. We request the explicit clarification of the protocol for determining “minor modifications” and making discretionary approvals in the name of transparency and honoring the intentions of the environmental review process as established by CEQR. Further, we recommend the proposed projects be subject to a full, formal Unified Land Use Review Process (ULURP) assessment due to their scale and potential for radical and lasting environmental impacts in the surrounding neighborhood.

Conclusion

The proposed Two Bridges LSRD projects represent a radical shift in the character of the Two Bridges neighborhood. The scale of the proposals--in both building height and number of new residents--is unprecedented in Two Bridges and, as a result, must be evaluated with a high level of scrutiny. This proposal threatens to dramatically undermine New York City’s goal to maintain housing affordability and build just, equitable neighborhoods. We urge the lead agency to make the aforementioned changes to the DSOW and perform an environmental assessment that the residents of Two Bridges deserve.

Thank you.

Sincerely,

Jim Shelton and Renae Widdison
Masters’ of City and Regional Planning Candidates, Pratt Institute

jamesdshelt@gmail.com
renaewiddison@gmail.com

From: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Sent: Tuesday, May 30, 2017 9:57 AM
To: Evan Lemonides (DCP); Samuel Nourieli (DCP); Joel Kolkmann (DCP); Xinyu Liang (DCP)
Cc: Erik Botsford (DCP); Danielle J. DeCerbo (DCP)
Subject: FW: Two Bridges Development Concerns

From: Matt Wolf [<mailto:mail@mattwolf.info>]
Sent: Friday, May 26, 2017 8:45 AM
To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>; Carl Williamson <carlwilliamson@gmail.com>
Cc: Magaret Chin <chin@council.nyc.gov>; niouy@nyassembly.gov; squadron@nysenate.gov
Subject: Two Bridges Development Concerns

Dear Robert Dobruskin, Margaret Chin, Yuh-Line Niou, Daniel Squadron,

My partner Carl Williamson and I are resident in District 1 at 504 Grand Street and we're very concerned about the proposal for three new towers in the Two Bridges neighborhood. These developments will fundamentally change the fabric of our community and I believe will lead to the displacement of low income and immigrant people in our community. I urge you to reject this proposal because of nefarious claims by the developers.

My concerns:

- Bus ridership will be hugely impacted despite the developers claims that it will not.
- If 2,775 new residential units come to Two Bridges, it constitutes a "sizable new neighborhood." The developers are not acknowledging this impact and are falsely arguing that we do not need to review police and fire department capacity which will put our community at risk.
- The developer is saying their residential occupancy will be smaller than Essex Crossing, but why is the study not looking into the compound effect of the huge influx of market rate residential units within the next three years? These developments will begin a larger wave of gentrification that will displace low income people and immigrant-owned businesses.
- With the influx of so many new residents, I expect that traffic and parking will be impossibly congested in our neighborhood. Parking lots are closing and there will not be nearly enough spots to accommodate all of these new residents.
- I understand that this development will use over 1 million gallons of water per day. How will our sewer system, electrical grid, and other infrastructure and utilities accommodate this? I'm very concerned about the environmental impact on infrastructure that is already at capacity.
- This development is surrounded by thousands of low income housing units. Why is the developer's study not looking at the impact they will have on subsidized housing or secondary displacement?

Affordable housing in this development will not serve the low income people who are an essential part of our community. Their median income is too low. I don't want my city and representatives to accommodate developers as first priority. I want you guys to prioritize the people who are already in the neighborhood and to fight for low income people who need the city's support first and foremost.

Thank you,

Matt Wolf & Carl Williamson
504 Grand Street #G1
New York, NY 10002

From: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Sent: Thursday, May 25, 2017 11:41 AM
To: Evan Lemonides (DCP); Samuel Nourieli (DCP); Joel Kolkmann (DCP); Xinyu Liang (DCP)
Cc: Erik Botsford (DCP)
Subject: FW: Development projects by two bridges

From: Peter Yuen [<mailto:yuenp123@gmail.com>]
Sent: Thursday, May 25, 2017 11:40 AM
To: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>
Subject: Development projects by two bridges

Hello Mr. Dobruskin,

I am writing to convey my concern and my neighbors' concern about the developments in the two bridges area. One main concern is the lack of infrastructure to support an influx of people to the area. The F train is becoming increasingly crowded by the day and adding thousands of people to the area will only exacerbate the problem. There have been accidents and numerous delays in part due to the crowdedness of the trains. This problem also extends to the FDR drive. Traffic is frequently causing crowding problems on the FDR. Exits are at times almost un-navigable. Additionally, there's a lack of grocery stores, convenience stores, and other resources for even the current residents of the area. Adding people and stores that the people cannot afford will severely displace the residents. Thank you for your time.

Sincerely,

Peter Yuen



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Gale A. Brewer, Borough President

May 25, 2017

**Testimony of Manhattan Borough President Gale A. Brewer
to the Department of City Planning
Public Scoping Meeting for Two Bridges LSRD – CEQR No.
17DCP48M**

Good afternoon. I am Manhattan Borough President Gale A. Brewer. I am here to testify in regard to the Draft Scope of Work (DSOW) prepared for the developments within the Two Bridges Large Scale Residential Development, located in the Lower East Side, Community Board 3, Borough of Manhattan.

The scope and scale of the cumulative development proposed for this single block, as a direct result of three separate infill proposals, represents more growth in a 36 month period than the neighborhood has seen in 30 years. Three years means an entire term in middle school for a young student, or the remaining life expectancy of a senior—and I fear such drastic development will not just disturb their quality of life. It will jeopardize their health, safety, and ability to thrive.

As you know, on June 22, 2016, my elected colleagues and I signed a letter asking the Department of City Planning (DCP) to interpret these proposed developments as major modifications to the Two Bridges Large Scale Residential Development (LSRD) requiring substantive

public review under the Uniform Land Use Review Procedure (ULURP).

DCP instead determined that these three proposals qualify only as minor modifications that will be simply be subject to a courtesy referral to the Community Board at a later date. I still find this unfortunate.

However, DCP did determine the necessity of this joint environmental review. DCP also required the individual developers to complete a joint EIS process, which includes four community engagement meetings. In response, we coordinated the residential tenant leaders into a community taskforce along with Councilmember Margaret Chin to liaise with this development team and to help coordinate community priorities and responses.

The taskforce designed a community survey with several goals, including deepening community understanding of the EIS process and identifying community concerns and priorities. A copy of the survey and the actual results will be submitted to DCP before the June 8, 2017 deadline.

Survey questions sought to capture respondents' relationship to the area, level of prior engagement with the development proposals, concerns relating to sections in the Environmental Review, and issues previously identified as priorities in community discussions. We received over 400 responses in English, Spanish, and Chinese from 10 different residential developments in the Two Bridges neighborhood, including five buildings located in the LSRD. Our staffs worked hard to produce accurate translations, administered surveys during tenant association meetings, answered very technical questions about the EIS process, and

crunched huge amounts of data received in three languages over just a few weeks.

The staffs of the office of the Manhattan Borough President and the Council Member attended over 30 meetings with residents to accomplish the goals set out by the survey.

We shared the significant results of that survey effort with the taskforce members and Community Board 3's Land Use Committee in order to help shape their testimony, advocacy, and ongoing discussions. I will also be referencing the survey results today, and will share notable findings with you:

- 320 of the respondents, or 76%, identified as living in Two Bridges. 307 of the respondents live directly within the LSRD.
- Of that 320, 74% have lived there for over 20 years.
- The top 5 priorities for respondents, ranked in order of significance, are:
 1. Affordability of the neighborhood
 2. Transportation improvements
 3. Construction impacts
 4. Building height impact on shadows and light
 5. Concern about air quality

I share the concerns identified by the residents who completed the survey, and I appreciate that they took the time to give input. I hope that DCP will take these results seriously, and make them a priority for detailed examination through this process.

Reasonable Alternatives

I strongly believe that there must be a more common sense alternative for these out-of-scale towers that would more properly fit the context of the neighborhood. Given the survey responses, this is a shared sentiment with the community. Major reasonable alternatives to the proposals would include more affordable units at deeper affordability, more public space, and lower building heights and bulk more appropriate to the current building landscape in order to preserve light and air.

Changes to these proposed projects to reflect these concerns would go a great distance to assure residents and elected officials that the developers are earnestly interested in *joining* a community, and not creating one separate from the current Two Bridges population. A lack of significant affordability and open space, plus super-tall, out of context buildings, will alienate the existing community. These new buildings may lead to indirect and direct displacement due to rising rents and higher prices for every day goods such as groceries.

Future Development and Resiliency

I am also wary of whether the DSOW has sufficiently taken into account the many other developments and initiatives occurring in and around the Two Bridges area. These projects include, but are not limited to:

- Lower Manhattan Coastal Resiliency (LMCR) project;
- The nearby super-tall buildings currently being erected by Extell;

- The recently announced land infill at NYCHA's LaGuardia Houses;
- Work on the Rutgers Tube that services the East Broadway F train stop (the only MTA train stop in the surrounding area for over half a mile); and
- Essex Crossing development

While none of these projects fall directly within the LSRD they are close by and have overlapping study areas. All of this construction and influx of new people in the surrounding area can adversely impact the neighborhood and its current residents.

Construction of the Extell project has caused residents in adjacent structures hardships that include cracks in apartment walls, doors dislodged from frames, ground shaking, lack of street access, filthy water along sidewalks, plus noise and air quality problems. Temporary impacts don't feel transient when many new buildings are being constructed.

There are other issues. Two Bridges sits on the edge of a Lower East Side rat reservoir, and developments in the area already experiencing rat infestations. The East Broadway train station is currently overcrowded, and although the DSOW considers the impact these three developments might have on it, it must also consider the other developments I mentioned—plus construction plans for the F train tunnel itself.

Of course, the work required on the Rutgers Tube is due to Hurricane Sandy—a storm so devastating that Two Bridges and other neighborhoods are still recovering. These projects should go to great lengths to avoid any duplicate efforts while coordinating construction

and resiliency measures with LMCR; on the other hand, these projects must not ‘pass the buck’ to LMCR and assume it is solving every resiliency problem for the area. These developments will have residents, and those residents will have neighbors. The developers should do all they can to ensure that not only the residents of JDS, L+M, and Starrett buildings are protected from a natural disaster, but also their neighbors.

Community Resources

A swelling of the neighborhood population may also put a significant strain on community resources, especially for vulnerable populations—including children, immigrants, non-English speakers, and seniors. Should these buildings be built, I fear that essential neighborhood staples like childcare, immigrant support organizations and senior support programs, low-cost restaurants and clothing stores that serve working class, non-English speaking families will lose their place in the community if commercial real estate rents soar. Any reduction of services would be devastating to the existing population in Two Bridges and nearby Chinatown/Lower East Side.

One type of community resource in particular that I believe deserves closer examination under CEQR is the capacity of health and senior care facilities in the area, and whether they’ll be able to absorb these additions to the population. Everyone needs access to hospitals and doctors, but especially seniors. As part of the 2,775 units proposed between these three developments, 200 of them are being preserved for seniors. This is, again, in addition to developments at Extell, Essex Crossing, and LaGuardia Houses. The DSOW states “the ability of health care facilities to provide services for a new project usually does

not warrant a detailed assessment under CEQR.” I would argue that this is an exceptional case, and ask that this area receive a detailed assessment.

In conversations with community-based organizations, I have also heard concerns about the increase in police presence and activity that usually accompanies a drastic upward change in the average household income of a neighborhood. In their assessment, this trend typically results in more frequent arrests and summonses of the incumbent population for minor infractions while a community undergoes gentrification. The safety and security of all citizens is always a top priority, but I am concerned about shifts in the socioeconomics of the neighborhood negatively impacting its longtime residents, the majority of whom are non-white and low-income. One such manifestation of this type of issue could be enforcement of the new developments’ private space policies—and a reason why any open space added as part of the projects should be accessible to the public, especially those residents who share that zoning lot.

Without the type of substantive conversation we could have through the ULURP process on proposed AMI levels, unit breakdowns, and unit size, it is difficult to state what impacts there may be on school seats. Experience has shown that short-term construction impacts are not actually short-term when they encompass the majority of a school year, that student quality of life is not a ‘quick fix’ when long-overdue facility upgrades remain unresolved, and that overcrowding will exacerbate both. The DEIS should disclose those impacts.

Land Use, Zoning, and Public Policy

As I've already stated, there is a need to analyze these three projects not just together, but also in the greater context of Two Bridges and the Lower East Side. All of Community Board 3 has seen rampant gentrification for at least a decade. In May 2016, the NYU Furman Center published a report on gentrification in New York neighborhoods and found the Lower East Side/Chinatown area to be gentrifying at the third-most drastic pace in New York City, with a 50.3% change in average rent between 1990 and 2014.

These three projects are not being proposed in isolation, but part of a trend sweeping across the area—and must be treated as such. While I recognize the LSRD has a specific boundary, the phenomenon of gentrification that may result in drastic changes to this neighborhood does not. So I ask again, given the extraordinary circumstances of this neighborhood seeing massive market-rate buildings enter an area built to mid-height for low- and moderate-income residents, that the area analyzed for this Scope of Work be expanded beyond the quarter-mile and include the surrounding projects like Extell, Essex Crossing, and the LaGuardia infill, at the very least.

Furthermore, the DEIS must address the fact that current resiliency zoning, to be permanently enacted following executive orders post-Sandy, does not help existing buildings. If new developments do not take a holistic look at the entire zoning lot, existing buildings and the existing population will remain vulnerable to flood and climate events.

Socioeconomic Conditions

I ask that DCP look not just at the types of real estate data listed in the DSOW, but also at how the *introduction* of a block of market-rate units can affect a neighborhood's affordability long-term. Again, like other neighborhoods in the city, these buildings are part of a trend, and I don't believe they'll be the last market-rate units to enter the local housing stock. I would point DCP to the NYU Furman Center's report on gentrification to weigh how an influx of market-rate units may further accelerate gentrification and indirect displacement in this neighborhood.

I did not see any specific mention of tenant harassment or abuse in the DSOW. This is something that must be examined, and another reason why the scope should be expanded to include the surrounding areas, including privately owned tenements. As you know, as property values increase, so do the incentives for landlords to push out rent-regulated or stabilized tenants. In order to exploit loopholes in real estate regulation and tenant protection provisions under these circumstances, landlords deploy a variety of tactics: using construction as harassment to create health hazards, allowing gas or hot water to be turned off, neglecting to make repairs, or aggressive and intimidating attempts to buy out tenants.

These types of abuses only get worse and more prevalent when tenants are part of a vulnerable population: immigrants, seniors, non-English speakers—the people who make Two Bridges, “Two Bridges.” I ask that DCP examine data around rent-regulated units, tenant harassment, and eviction in the area—engaging local community-based organizations where appropriate.

I am also concerned about the safety and health of the seniors at 80 Rutgers Slip who will be moved as a result of the construction of a building that will cantilever over theirs. Specifically, I believe it should be top priority that the elected officials see any re-location plans for the seniors who live in the apartment lines being built over as soon as possible, and that these plans be completed and viewed by our offices in advance of any approval of the Final EIS. It is unacceptable that there would be any ambiguity around the fate of a group of seniors who've been part of this community for decades for the benefit of a real estate development.

Transportation

One major concern regarding transportation is capacity and access at the F train's East Broadway stop. In a neighborhood with a high number of seniors (and at least 200 more to move in if these projects are approved), it is the only train station for over a half-mile in any direction, is several flights of stairs below grade, has cramped and confusing entrances/exits, and sits on a hill above the Two Bridges neighborhood.

This train station needs elevators and a corrected internal circulation core. It is already crowded during rush hour, with residents lined up to street level in order to get into the station. This puts seniors, mothers with small children, and those with disabilities at serious risk. It's not a question of whether there are elevators (and upgrades to the escalators) needed at this station; it's a question of how many and where. This station needs to be made ADA accessible.

With an influx of almost 3000 units for these three projects, plus the others in the area, the platform will be bursting at the seams—especially since there are sure to be serious delays once construction starts on the Rutgers Tube that takes the F train to and from Brooklyn. In March of this year, other local elected officials and I wrote a letter to the MTA requesting more information on this work. We never received a response. I request that DCP, DOT, NYCT, and all relevant agencies coordinate with the MTA in advance of any plans being approved.

I also ask that the City and developers look into providing a shuttle around the LSRD area that can take seniors and those with disabilities to and from the M22, M15, or F train stop, as well as an examination of the timeliness and overcrowding of those two MTA bus lines. My office and the other elected officials have long heard complaints about both of these bus lines from neighborhood residents.

Sidewalks are another long-overlooked aspect of transportation in this neighborhood. Fissures dot walkways all around the LSRD, the neighboring NYCHA buildings, and up to Henry and Madison Streets. As you surely know, large sidewalk cracks are not only dangerous to pedestrians and the disabled, they are an access point for rats and can exacerbate an area's rodent problem. I thank NYCHA for responding to the local elected officials' request for re-paving a portion of the sidewalks surrounding LaGuardia Houses, but there is still a tremendous amount of work to be done there and in the surrounding blocks.

Parking and deliveries for both commercial businesses and construction sites are a grave concern as well. Work on the Extell site has crippled the surrounding streets during construction hours, and made sidewalks dangerous for some. I hope there will be a detailed analysis of how

construction might interfere with resident and business-related vehicles on the street, as well as pedestrian use of the sidewalk. Mitigation would include a coordinated plan for trash pick-up and deliveries, partial street closures for construction with consistent and regular updates to the community, and a point person from each development to coordinate with the community over quality of life issues. And none of this should spill over to the weekends. With this much construction, no after-hour variances should be granted in order to provide a reprieve to existing residents, and the construction timelines need to reflect that.

Closing

I still find City Planning's determination to interpret these applications as minor modifications disheartening. Determining them to be major modifications, which I still believe should be the case, would have subjected them to the appropriate level of scrutiny and triggered a Uniform Land Use Review Process, one of our city's most venerable systems of ensuring equity in an ever-changing city. This would have mandated a closer examination of all the issues I've raised today, most of which come directly from a survey of Two Bridges residents' greatest concerns.

I hope that the Department of City Planning will honor what it told Councilmember Chin and me at the beginning of this process—that it understood these were not just any minor modifications and that these were extraordinary circumstances for this neighborhood. That is how we got this 'joint EIS' process, the first time it has ever been done. But the exceptional nature of this case must remain at the forefront of City Planning's conversations as it finalizes the draft scope of work: these

three buildings would not be built in isolation. They are part of a larger sweeping trend across an entire neighborhood, fundamentally shifting the community already in place. From the LaGuardia infill to Essex Crossing to Extell to half-billion dollar resiliency plans and beyond, City Planning must expand its scope beyond the default quarter-mile and default numerical thresholds, and look at the whole picture. That is how the agency will do right by this community.

Thank you for this opportunity to testify. We hope that all of the concerns voiced here today are addressed prior to certifying the Draft EIS.



MANHATTAN BOROUGH PRESIDENT



NEW YORK CITY COUNCIL

June 8, 2017

Robert Dobruskin, AICP, Director
Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271

Dear Director Dobruskin:

Enclosed please find copies of the oral testimony delivered on May 25, 2017 during both sessions on the Draft Scope of Work for the Two Bridges Large Scale Residential Development Area Project (CEQR No. 17DCP148M).

During our testimony, we referenced a community survey. Our offices, along with community leaders and local organizations in the Two Bridges neighborhood, created and disseminated the community survey to capture the community's concerns regarding the three proposed developments. A copy of the survey and the survey analysis are included in this package. The survey should be considered an extension of the testimony for purposes of enumerating concerns and responses as part of the DEIS.

Sincerely,

Handwritten signature of Gale A. Brewer in black ink.

Gale A. Brewer
Manhattan Borough President

Handwritten signature of Margaret S. Chin in black ink.

Margaret S. Chin
Councilmember

CC:

Olga Abinader, Deputy Director of Environmental Assessment and Review Division at
Department of City Planning
Joel Kolkman, Team Leader, Manhattan Office at Department of City Planning



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Gale A. Brewer, Borough President

May 25, 2017

**Testimony of Manhattan Borough President Gale A. Brewer
to the Department of City Planning
Public Scoping Meeting for Two Bridges LSRD – CEQR No. 17DCP148M**

Good afternoon. I am Manhattan Borough President Gale A. Brewer. I am here to testify in regard to the Draft Scope of Work (DSOW) prepared for the developments within the Two Bridges Large Scale Residential Development, located in the Lower East Side, Community Board 3, Borough of Manhattan.

The scope and scale of the cumulative development proposed for this single block, as a direct result of three separate infill proposals, represents more growth in a 36 month period than the neighborhood has seen in 30 years. Three years means an entire term in middle school for a young student, or the remaining life expectancy of a senior—and I fear such drastic development will not just disturb their quality of life. It will jeopardize their health, safety, and ability to thrive.

As you know, on June 22, 2016, my elected colleagues and I signed a letter asking the Department of City Planning (DCP) to interpret these proposed developments as major modifications to the Two Bridges Large Scale Residential Development (LSRD) requiring substantive public review under the Uniform Land Use Review Procedure (ULURP).

DCP instead determined that these three proposals qualify only as minor modifications that will be simply be subject to a courtesy referral to the Community Board at a later date. I still find this unfortunate.

However, DCP did determine the necessity of this joint environmental review. DCP also required the individual developers to complete a joint EIS process, which includes four community engagement meetings. In response, we coordinated the residential tenant leaders into a community taskforce along with Councilmember Margaret Chin to liaise with this development team and to help coordinate community priorities and responses.

The taskforce designed a community survey with several goals, including deepening community understanding of the EIS process and identifying community concerns and priorities. A copy of the survey and the actual results will be submitted to DCP before the June 8, 2017 deadline.

Survey questions sought to capture respondents' relationship to the area, level of prior engagement with the development proposals, concerns relating to sections in the Environmental Review, and issues previously identified as priorities in community discussions. We received over 400 responses in English, Spanish, and Chinese from 10 different residential developments in the Two Bridges neighborhood, including five buildings located in the LSRD. Our staffs worked hard to produce accurate translations, administered surveys during tenant association meetings, answered very technical questions about the EIS process, and crunched huge amounts of data received in three languages over just a few weeks.

The staffs of the office of the Manhattan Borough President and the Council Member attended over 30 meetings with residents to accomplish the goals set out by the survey.

We shared the significant results of that survey effort with the taskforce members and Community Board 3's Land Use Committee in order to help shape their testimony, advocacy, and ongoing discussions. I will also be referencing the survey results today, and will share notable findings with you:

- 320 of the respondents, or 76%, identified as living in Two Bridges. 307 of the respondents live directly within the LSRD.
- Of that 320, 74% have lived there for over 20 years.
- The top 5 priorities for respondents, ranked in order of significance, are:
 - Affordability of the neighborhood
 - Transportation improvements
 - Construction impacts
 - Building height impact on shadows and light
 - Concern about air quality

I share the concerns identified by the residents who completed the survey, and I appreciate that they took the time to give input. I hope that DCP will take these results seriously, and make them a priority for detailed examination through this process.

Reasonable Alternatives

I strongly believe that there must be a more common sense alternative for these out-of-scale towers that would more properly fit the context of the neighborhood. Given the survey responses, this is a shared sentiment with the community. Major reasonable alternatives to the proposals would include more affordable units at deeper affordability, more public space, and lower building heights and bulk more appropriate to the current building landscape in order to preserve light and air.

Changes to these proposed projects to reflect these concerns would go a great distance to assure residents and elected officials that the developers are earnestly interested in *joining* a community, and not creating one separate from the current Two Bridges population. A lack of significant affordability and open space, plus super-tall, out of context buildings, will alienate the existing community. These new buildings may lead to indirect and direct displacement due to rising rents and higher prices for every day goods such as groceries.

Future Development and Resiliency

I am also wary of whether the DSOW has sufficiently taken into account the many other developments and initiatives occurring in and around the Two Bridges area. These projects include, but are not limited to:

- Lower Manhattan Coastal Resiliency (LMCR) project;
- The nearby super-tall buildings currently being erected by Extell;
- The recently announced land infill at NYCHA's LaGuardia Houses;
- Work on the Rutgers Tube that services the East Broadway F train stop (the only MTA train stop in the surrounding area for over half a mile); and
- Essex Crossing development

While none of these projects fall directly within the LSRD they are close by and have overlapping study areas. All of this construction and influx of new people in the surrounding area can adversely impact the neighborhood and its current residents.

Construction of the Extell project has caused residents in adjacent structures hardships that include cracks in apartment walls, doors dislodged from frames, ground shaking, lack of street access, filthy water along sidewalks, plus noise and air quality problems. Temporary impacts don't feel transient when many new buildings are being constructed.

There are other issues. Two Bridges sits on the edge of a Lower East Side rat reservoir, and developments in the area already experiencing rat infestations. The East Broadway train station is currently overcrowded, and although the DSOW considers the impact these three developments might have on it, it must also consider the other developments I mentioned—plus construction plans for the F train tunnel itself.

Of course, the work required on the Rutgers Tube is due to Hurricane Sandy—a storm so devastating that Two Bridges and other neighborhoods are still recovering. These projects should go to great lengths to avoid any duplicate efforts while coordinating construction and resiliency measures with LMCR; on the other hand, these projects must not 'pass the buck' to LMCR and

assume it is solving every resiliency problem for the area. These developments will have residents, and those residents will have neighbors. The developers should do all they can to ensure that not only the residents of JDS, L+M, and Starrett buildings are protected from a natural disaster, but also their neighbors.

Community Resources

A swelling of the neighborhood population may also put a significant strain on community resources, especially for vulnerable populations—including children, immigrants, non-English speakers, and seniors. Should these buildings be built, I fear that essential neighborhood staples like childcare, immigrant support organizations and senior support programs, low-cost restaurants and clothing stores that serve working class, non-English speaking families will lose their place in the community if commercial real estate rents soar. Any reduction of services would be devastating to the existing population in Two Bridges and nearby Chinatown/Lower East Side.

One type of community resource in particular that I believe deserves closer examination under CEQR is the capacity of health and senior care facilities in the area, and whether they'll be able to absorb these additions to the population. Everyone needs access to hospitals and doctors, but especially seniors. As part of the 2,775 units proposed between these three developments, 200 of them are being preserved for seniors. This is, again, in addition to developments at Extell, Essex Crossing, and LaGuardia Houses. The DSOW states “the ability of health care facilities to provide services for a new project usually does not warrant a detailed assessment under CEQR.” I would argue that this is an exceptional case, and ask that this area receive a detailed assessment.

In conversations with community-based organizations, I have also heard concerns about the increase in police presence and activity that usually accompanies a drastic upward change in the average household income of a neighborhood. In their assessment, this trend typically results in more frequent arrests and summonses of the incumbent population for minor infractions while a community undergoes gentrification. The safety and security of all citizens is always a top priority, but I am concerned about shifts in the socioeconomics of the neighborhood negatively impacting its longtime residents, the majority of whom are non-white and low-income. One such manifestation of this type of issue could be enforcement of the new developments' private space policies—and a reason why any open space added as part of the projects should be accessible to the public, especially those residents who share that zoning lot.

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actually short-term when they encompass the majority of a school year, that student quality of life is not a 'quick fix' when long-overdue facility upgrades remain unresolved, and that overcrowding will exacerbate both. The DEIS should disclose those impacts.

Land Use, Zoning, and Public Policy

As I've already stated, there is a need to analyze these three projects not just together, but also in the greater context of Two Bridges and the Lower East Side. All of Community Board 3 has seen rampant gentrification for at least a decade. In May 2016, the NYU Furman Center published [a report](#) on gentrification in New York neighborhoods and found the Lower East Side/Chinatown area to be gentrifying at the third-most drastic pace in New York City, with a 50.3% change in average rent between 1990 and 2014.

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circumstances, landlords deploy a variety of tactics: using construction as harassment to create health hazards, allowing gas or hot water to be turned off, neglecting to make repairs, or aggressive and intimidating attempts to buy out tenants.

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Transportation

One major concern regarding transportation is capacity and access at the F train’s East Broadway stop. In a neighborhood with a high number of seniors (and at least 200 more to move in if these projects are approved), it is the only train station for over a half-mile in any direction, is several flights of stairs below grade, has cramped and confusing entrances/exits, and sits on a hill above the Two Bridges neighborhood.

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an examination of the timeliness and overcrowding of those two MTA bus lines. My office and the other elected officials have long heard complaints about both of these bus lines from neighborhood residents.

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Closing

I still find City Planning's determination to interpret these applications as minor modifications disheartening. Determining them to be major modifications, which I still believe should be the case, would have subjected them to the appropriate level of scrutiny and triggered a Uniform Land Use Review Process, one of our city's most venerable systems of ensuring equity in an ever-changing city. This would have mandated a closer examination of all the issues I've raised today, most of which come directly from a survey of Two Bridges residents' greatest concerns.

I hope that the Department of City Planning will honor what it told Councilmember Chin and me at the beginning of this process—that it understood these were not just any minor modifications and that these were extraordinary circumstances for this neighborhood. That is how we got this 'joint EIS' process, the first time it has ever been done. But the exceptional nature of this case must remain at the forefront of City Planning's conversations as it finalizes the draft scope of work: these three buildings would not be built in isolation. They are part of a larger sweeping trend across an entire neighborhood, fundamentally shifting the community already in place.

From the LaGuardia infill to Essex Crossing to Extell to half-billion dollar resiliency plans and beyond, City Planning must expand its scope beyond the default quarter-mile and default numerical thresholds, and look at the whole picture. That is how the agency will do right by this community.

Thank you for this opportunity to testify. We hope that all of the concerns voiced here today are addressed prior to certifying the Draft EIS.

Appendix A
Two Bridges Neighborhood Survey

**This survey was developed by your elected officials and tenant leaders -
to learn your needs and wants for
YOUR TWO BRIDGES COMMUNITY!**

There are 3 residential developments proposed for the Two Bridges Waterfront. We want your input on community priorities for the Environmental Review (EIS) process. For more information on EIS, see your tenant leader.

The survey should take about 10-15 minutes and can be returned to your tenant leader, or emailed to ebaptiste@manhattanbp.nyc.gov and rearley@council.nyc.gov.

1) Please select all that apply to you:

- I live here
For how long?
 - Less than 5 years
 - 5-10 years
 - 11-19 years
 - 20 years or more
- I am a property owner here
- I am a student here
- I am an advocate/organizer/volunteer here
- I used to live here
- A close family member lives here
- I work here
- I own a business here
- Other _____

2) If you live in Two Bridges along the waterfront, what development do you live in?

- 80 Rutgers Slip: Two Bridges Senior Apartments
- 82 Rutgers Slip: Two Bridges Tower
- 275 South Street: Lands End I (aka 257 Clinton)
- 265-275 Cherry: Lands End II
- Two Bridges Townhouses
- 286 South Street: Two Bridges NYCHA
- Area NYCHA resident
- Other: _____

3) Have you attended a meeting about the joint Environmental Impact Study (EIS) of the proposed developments along the Two Bridges waterfront?

- Yes
- No

4) What is the MOST IMPORTANT thing about the Two Bridges neighborhood to you?

5) What are your TOP FIVE CONCERNS about new developments along the waterfront? Please rank them 1-5, #1 being your biggest concern.

- Affordability of neighborhood (rising rents, displacement or secondary displacement)
- Neighborhood character and culture
- Open and green space (ex. parks, playgrounds)
- Overcrowding Schools/Day Care
- Historic resources/architecture
- Height of building/shadows/views
- Infrastructure (ex. water, sewer, sanitation)
- Transportation (ex. subway, Busses, Parking)
- Impact of construction (ex. disruptions due to construction, timing of projects, dust & noise)
- Public Health (ex. exposure to contaminants)
- Climate Change & Waterfront Resiliency
- Noise (ex. extreme traffic changes)
- Air Quality (ex. Air pollutants)
- Hazardous Materials
- Local businesses being displaced
- Influx of new residents
- Waterfront access
- Other _____

Part 2 of Survey: Specific Needs

- 1) What is **MISSING** for you in your community? **Please choose FIVE, ranking them 1-5 with #1 as your most preferred.**
- Schools, educational resources, after-school and youth programs
 - Affordable retail stores (clothing, pharmacy, etc.)
 - Affordable, healthy food (grocery stores, farmers markets)
 - Affordable, quality housing for local families
 - Building maintenance
 - Better transportation & other alternatives
 - Police & other public safety measures
 - Senior activities, educational programs & services
 - Accessible resources for people with disabilities (shuttle buses, F train elevator)
 - Open and green space
 - Jobs & Jobs training
 - Cultural spaces & activities
 - Community participation
 - Other _____
- 2) What type of **business & job growth** do you want to see in the community? **Please choose FIVE, ranking them 1-5 with #1 as your most preferred.**
- Construction jobs on any new developments
 - Retail and security jobs at local businesses
 - Small business incubators for local residents
 - Training for local residents for tech jobs (coding, web design, etc.)
 - Art galleries supporting local artists
 - Other _____
- 3) What do you believe is needed to keep the neighborhood **affordable** for your community? **Please choose FIVE, ranking them 1-5 with #1 as your biggest concern.** **The Department of Housing and Urban Development determines the Area Median Income (AMI) –combined household income– which is used as a guideline for affordable housing developments in NYC.*
- Price of affordable housing (at 40% AMI [\$36,240 for a family of 4] and below)
 - Amount of affordable housing (more units available at various AMI levels)
 - Small business planning support and improvements for local stores
 - Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)
 - Low prices for local retail (clothes, home goods, gas, etc.)
 - Affordable parking spaces for locals
 - Child day care, senior center, etc.
 - Other _____
- 4) What kinds of **community facilities** do you most want to see in the community? **Please choose FIVE, ranking them 1-5 with #1 as your biggest concern.**
- Senior resource center
 - Affordable sports/exercise facility
 - Cultural spaces
 - Community Meeting Space
 - Health center
 - Job training center
 - Other _____
- 5) What **transportation** needs are most important to you in the community? **Please choose FIVE, ranking them 1-5 with #1 as your most preferred.**
- Affordable parking spaces for local residents
 - More frequent subway and bus service
 - Shuttle for seniors and people with disabilities to get to/from MTA stops
 - Elevator or additional escalator service at East Broadway subway stop
 - Other _____
- 6) What kinds of **open space** would you most like to see in your community? **Please choose FIVE, ranking them 1-5 with #1 as your most preferred.**
- Recreational access to the waterfront
 - Green space / park space
 - Community garden
 - Playground
 - Outdoor benches and tables
 - Space for organized sports: basketball, tennis, soccer, handball courts
 - Other _____

此份調查旨在幫助您的民選官員與租戶代表進一步了解
雙橋社區居民對
雙橋社區的各種期許與需求

目前有三項住宅開發項目被提議建造於雙橋沿岸地區內。我們希望您能夠在環境影響審查 (Environmental Review ; EIS) 過程中就社區內應當優先考慮的事項提出意見。如希望進一步了解EIS, 請與您的租戶代表討論。

此份調查卷大約需要 10-15分鐘來完成, 可以遞交給您的租戶代表, 也可以以電子郵件形式送交至電子郵箱ebaptiste@manhattanbp.nyc.gov 與 rearley@council.nyc.gov。

1) 請選擇所有適用於您的選項：

- 我住在這裡
- 有多久了?
 - 少於5年
 - 5-10年
 - 11-19年
 - 20年或更久
- 我在這裡擁有自己的房產
- 我是住在這裡的學生
- 我是這裡的社區代言人/組織人/義工
- 我曾經住在這裡
- 我有親戚住在這裡
- 我在這裡工作
- 我在這裡擁有企業
- 其他 _____

2) 如果您住在雙橋區域內的沿岸地區, 請問您住在哪一個開發社區內?

- 80 羅格斯街: 雙橋區耆老公寓
- 82 羅格斯街: 雙橋區大樓
- 275 South Street: Lands End I大樓 (亦稱為 257 柯林頓街)
- 265-275 櫻桃街: Lands End II大樓
- Two Bridges Townhouses
- 286 南街: 雙橋區紐約市房屋局 (NYCHA) 住宅
- 紐約市房屋局 (NYCHA) 住宅住戶
- 其他: _____

3) 您是否出席參加過關於雙橋沿岸區域內所提議之開發項目的合作環境影響研究的會議?

- 是
- 否

4) 請問雙橋鄰里內對您來說最重要的是什麼?

5) 您對沿岸新開發項目最為關懷的五項事件是什麼? 請選擇五個選項, 按選擇優先順序填入數目號碼1-5, 以#1為您最為關懷的事項。

- 鄰里的可負擔性 (租金增漲、迫遷或是被帶迫遷)
- 鄰里特色和文化
- 開放和綠化空間 (例如公園、遊樂園等)
- 學校/托兒所過度擁擠
- 歷史資源/建築
- 建築物高度/陰影/視覺資源
- 基本設施 (例如上下水道、衛生等)
- 交通 (例如地鐵、巴士、停車等)
- 建築工程本身的影響 (例如建築工程造成打攪、項目建築時間、灰塵與噪音等)
- 公眾保健衛生問題 (例如被曝露於汙染物等)
- 氣候變化與沿岸地區地質的耐久性
- 噪音 (例如交通量變化等)
- 空氣質量 (例如空氣汙染物等)
- 危險物質
- 本地企業被迫遷
- 湧入大批新住民
- 是否能夠繼續利用沿岸地區
- 其他 _____

調查問卷第2部分：特定需求

- 1) 您的社區缺乏的是什麼？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為您最優先的選擇。
- | | |
|---|--|
| <input type="checkbox"/> 學校、教育資源、課後與青少年活動等 | <input type="checkbox"/> 耆老活動、教育計畫與服務 |
| <input type="checkbox"/> 可負擔的零售商店（服裝、藥店等） | <input type="checkbox"/> 傷殘人士可用的資源（穿梭巴士、地鐵F車電梯等） |
| <input type="checkbox"/> 可負擔而健康的食物（食物店、農夫市場等） | <input type="checkbox"/> 開放與綠化空間 |
| <input type="checkbox"/> 為當地家庭提供的可負擔住宅 | <input type="checkbox"/> 工作與工作培訓 |
| <input type="checkbox"/> 建築物維修 | <input type="checkbox"/> 文化空間與活動 |
| <input type="checkbox"/> 更好的交通工具與更多的選擇 | <input type="checkbox"/> 社區人士參入 |
| <input type="checkbox"/> 警察與公眾安全措施 | <input type="checkbox"/> 其他_____ |

- 2) 您希望在社區內見到什麼種類的企業與工作機會增長？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為最優先的選擇。
- | | |
|--|--------------------------------------|
| <input type="checkbox"/> 任何新開發項目內的建築工 | <input type="checkbox"/> 支持當地藝術家的藝術廊 |
| <input type="checkbox"/> 當地企業的零售與保安工作 | <input type="checkbox"/> 其他_____ |
| <input type="checkbox"/> 為當地住民所提供的小型企業孵化器 | |
| <input type="checkbox"/> 為當地住民提供科技工作培訓（編寫電腦程序、網站設計等） | |

- 3) 請問您認為要保持鄰里的可負擔性，在您的社區內所需要的是什麼？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為您最為關心的事項。*美國住房與城市開發部決定的地區中收入（Area Median Income；簡稱AMI）-家庭收入總數-而這個數目在紐約市可負擔住宅開發項目內做為準則。
- | | |
|--|--|
| <input type="checkbox"/> 可負擔住宅的價格（在AMI的40%，對4人成員的家庭而言就是\$36,240） | <input type="checkbox"/> 低廉的當地零售品價格（服裝、家用物品、汽油等） |
| <input type="checkbox"/> 可負擔住宅的數量（提供更多針對各個AMI層次的住宅單位） | <input type="checkbox"/> 為當地住民提供可負擔的停車位 |
| <input type="checkbox"/> 小型企業策劃支持以及為當地商店所提供的改進設施 | <input type="checkbox"/> 兒童托兒服務、耆老中心等 |
| <input type="checkbox"/> 低廉的當地日用品價格（食品店、藥店、學校文具等） | <input type="checkbox"/> 其他_____ |

您最希望在社區內見到哪些社區設施？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為您最為關心的事項。

- | | |
|--------------------------------------|----------------------------------|
| <input type="checkbox"/> 耆老資源中心 | <input type="checkbox"/> 保健中心 |
| <input type="checkbox"/> 可負擔的體育/運動設施 | <input type="checkbox"/> 就業培訓中心 |
| <input type="checkbox"/> 文化空間 | <input type="checkbox"/> 其他_____ |
| <input type="checkbox"/> 社區會議空間 | |

- 4) 在社區內，哪些交通需求對您最重要？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為最優先的選擇。

- | | |
|--|----------------------------------|
| <input type="checkbox"/> 為當地住民提供可負擔的停車空間 | <input type="checkbox"/> 其他_____ |
| <input type="checkbox"/> 更為頻繁的公車與地鐵服務 | |
| <input type="checkbox"/> 幫助耆老或傷殘人士往來於MTA車站的穿梭巴士 | |
| <input type="checkbox"/> 在東百老匯（East Broadway）地鐵站提供電梯或更多的電動扶梯服務 | |

- 5) 您希望在您的社區內見到哪些種類的開放空間？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為最優先的選擇。

- | | |
|--------------------------------------|--|
| <input type="checkbox"/> 沿岸地區可供予遊樂用途 | <input type="checkbox"/> 戶外桌椅 |
| <input type="checkbox"/> 綠化空間/公園空間 | <input type="checkbox"/> 用於團體運動的空間：籃球、網球、足球、手球場等 |
| <input type="checkbox"/> 社區園圃 | <input type="checkbox"/> 其他_____ |
| <input type="checkbox"/> 兒童遊樂場 | |

La presente encuesta fue desarrollada por sus funcionarios electos y líderes de los inquilinos con la finalidad de conocer sus necesidades y deseos para
SU COMUNIDAD DE TWO BRIDGES.

Existen 3 propuestas de desarrollos residenciales en la zona costera de Two Bridges. Queremos conocer su opinión sobre las prioridades de la comunidad para el proceso de revisión ambiental (EIS). Para obtener más información sobre la EIS, consulte con su líder de los inquilinos.

La encuesta debería tomarle unos 10 a 15 minutos y puede ser devuelta a su líder de los inquilinos, o enviada por correo electrónico a ebaptiste@manhattanbp.nyc.gov y rearley@council.nyc.gov.

1) Seleccione todas las opciones que apliquen para usted:

- Yo vivo aquí
 ¿Durante cuánto tiempo?
 Menos de 5 años 5 a 10 años 11 a 19 años 20 años o más
- Soy dueño de un inmueble aquí
 Estudio aquí
 Soy un defensor/organizador/voluntario aquí
 Solía vivir aquí
 Un pariente cercano vive aquí
 Trabajo aquí
 Soy dueño de un negocio aquí
 Otros _____

2) Si vive en la zona costera de Two Bridges, ¿en qué urbanización vive?

- 80 Rutgers Slip: Apartamentos para adultos mayores de Two Bridges Viviendas unifamiliares de Two Bridges
 82 Rutgers Slip: Two Bridges Tower 286 South Street: NYCHA de Two Bridges
 275 South Street: Lands End I (también conocido como 257 Clinton) Área de residentes de la NYCHA
 265-275 Cherry: Lands End II Otros: _____

3) ¿Ha asistido a una reunión sobre el Estudio de Impacto Ambiental (EIS) conjunto de los desarrollos urbanos propuestos a lo largo de la línea de costera de Two Bridges?

- Sí No

4) ¿Para usted cuál es la cosa **MÁS IMPORTANTE** sobre la zona de Two Bridges?

5) ¿Cuáles son sus **CINCO PRINCIPALES PREOCUPACIONES** sobre los nuevos desarrollos urbanos a lo largo de la zona costera? Clasifíquelas del 1 al 5, siendo la n°. 1 su mayor preocupación.

- | | |
|---|---|
| <input type="checkbox"/> Asequibilidad del vecindario (incrementos en los alquileres, desalojos o desplazamientos secundarios) | <input type="checkbox"/> Salud Pública (por ej. exposición a contaminantes) |
| <input type="checkbox"/> Carácter y la cultura del vecindario | <input type="checkbox"/> Cambio climático y la resiliencia de la zona costera |
| <input type="checkbox"/> Espacios abiertos y áreas verdes (por ej. parques, patios de recreo) | <input type="checkbox"/> Ruido (por ej. cambios extremos en el tráfico) |
| <input type="checkbox"/> Hacinamiento de escuelas/guarderías | <input type="checkbox"/> Calidad del aire (por ej. contaminantes del aire) |
| <input type="checkbox"/> Recursos históricos/arquitectura | <input type="checkbox"/> Materiales peligrosos |
| <input type="checkbox"/> Altura de los edificios/sombras/vistas | <input type="checkbox"/> Empresas locales desplazadas |
| <input type="checkbox"/> Infraestructura (por ej. agua, alcantarillado, saneamiento) | <input type="checkbox"/> Afluencia de nuevos residentes |
| <input type="checkbox"/> Transporte (por ej. metro, autobuses, estacionamientos) | <input type="checkbox"/> Acceso a la zona costera |
| <input type="checkbox"/> Impacto de la construcción (por ej. interrupciones debido a la construcción, horarios de los proyectos, polvo y ruido) | <input type="checkbox"/> Otros: _____ |

Párrte 2 de la encuesta: Necesidades específicas

- 1) ¿Para usted qué está **FALTANDO** en su comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su primera elección.**
- | | |
|--|---|
| <input type="checkbox"/> Escuelas, recursos educativos, programas extracurriculares y juveniles | <input type="checkbox"/> Actividades programas educativos y servicios para adultos mayores |
| <input type="checkbox"/> Tiendas minoristas asequibles (ropa, farmacia, etc.) | <input type="checkbox"/> Recursos accesibles para personas con discapacidades (autobuses de tránsito, elevadores de tren) |
| <input type="checkbox"/> Alimentos asequibles y saludables (supermercados, mercados de agricultores) | <input type="checkbox"/> Espacios abiertos y áreas verdes |
| <input type="checkbox"/> Viviendas asequibles de calidad para las familias locales | <input type="checkbox"/> Empleos y capacitación laboral |
| <input type="checkbox"/> Mantenimiento de edificios | <input type="checkbox"/> Espacios y actividades culturales |
| <input type="checkbox"/> Mejor transporte y otras alternativas | <input type="checkbox"/> Participación comunitaria |
| <input type="checkbox"/> Policía y otras medidas de seguridad pública | <input type="checkbox"/> Otros _____ |
- 2) ¿Qué tipo de **crecimiento empresarial y de empleos** le gustaría ver en la comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su primera elección.**
- | | |
|--|---|
| <input type="checkbox"/> Empleos de construcción para los nuevos desarrollos | <input type="checkbox"/> Galerías de arte que apoyan a los artistas locales |
| <input type="checkbox"/> Empleos minoristas y de seguridad en negocios locales | <input type="checkbox"/> Otros _____ |
| <input type="checkbox"/> Incubadoras de pequeños negocios para residentes locales | |
| <input type="checkbox"/> Capacitación en empleos de tecnología para residentes locales (codificación, diseño de páginas web, etc.) | |
- 3) ¿Qué cree que se necesita para mantener el vecindario **asequible** para su comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su mayor preocupación.** **El Departamento de Vivienda y Desarrollo Urbano del Gobierno Federal determina el ingreso medio del área (AMI, por sus siglas en inglés), es decir los ingresos combinados de los hogares, el cual se utiliza como guía para los proyectos de viviendas asequibles en Nueva York.*
- | | |
|--|---|
| <input type="checkbox"/> Precios de viviendas asequibles (a un 40% del AMI [\$ 36,240 para una familia de 4] y menos) | <input type="checkbox"/> Precios bajos en los minoristas locales (ropa, artículos para el hogar, gas, etc.) |
| <input type="checkbox"/> Cantidad de viviendas asequibles (más unidades disponibles para distintos niveles de AMI) | <input type="checkbox"/> Espacios de estacionamiento asequibles para los habitantes locales |
| <input type="checkbox"/> Apoyo para la planificación de las pequeñas empresas y mejoras para las tiendas locales | <input type="checkbox"/> Guarderías infantiles, centros para personas de la tercera edad, etc. |
| <input type="checkbox"/> Precios bajos para las necesidades diarias locales (supermercados, farmacias, material escolar, etc.) | <input type="checkbox"/> Otros _____ |
- 4) ¿Qué tipos de **instalaciones comunales** le gustaría ver más en la comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su mayor preocupación.**
- | | |
|--|---|
| <input type="checkbox"/> Centro de recursos para personas de la tercera edad | <input type="checkbox"/> Centro de salud |
| <input type="checkbox"/> Instalación deportiva/gimnasio asequible | <input type="checkbox"/> Centro de capacitación laboral |
| <input type="checkbox"/> Espacios culturales | <input type="checkbox"/> Otros _____ |
| <input type="checkbox"/> Espacio de reunión de la comunidad | |
- 5) ¿Qué necesidades de **transporte** son más importantes para usted dentro de la comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su primera elección.**
- | | |
|--|--------------------------------------|
| <input type="checkbox"/> Espacios de estacionamiento asequibles para residentes locales | <input type="checkbox"/> Otros _____ |
| <input type="checkbox"/> Servicios de metro y autobuses más frecuentes | |
| <input type="checkbox"/> Autobuses de tránsito para ancianos y personas con discapacidad para llegar/salir desde las paradas del MTA | |
| <input type="checkbox"/> Elevador o servicio adicional de escaleras mecánicas en la parada del metro de East Broadway | |
- 6) ¿Qué tipos de **espacios abiertos** son los que más le gustaría ver en su comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su primera elección.**
- | | |
|--|--|
| <input type="checkbox"/> Acceso recreativo a la zona costera | <input type="checkbox"/> Bancas y mesas al aire libre |
| <input type="checkbox"/> Espacios verdes / parques | <input type="checkbox"/> Espacios para deportes organizados: canchas de baloncesto, tenis, soccer, balonmano |
| <input type="checkbox"/> Huertos comunitarios | <input type="checkbox"/> Otros _____ |
| <input type="checkbox"/> Patios de recreo | |

Appendix B
Two Bridges Neighborhood Survey Results

EXECUTIVE SUMMARY ON TWO BRIDGES TASK FORCE NEIGHBORHOOD SURVEY METHODOLOGY AND FINDINGS

Introduction:

On June 22, 2016, Councilmember Margaret Chin and Manhattan Borough President Gale Brewer were joined by their colleagues representing the Two Bridges Waterfront in a letter to former Department of City Planning (DCP) Director Carl Weisbrod. The letter formally requested that proposed minor-modifications to the Large Scale Residential Plan be considered by the department as major modifications triggering the city full public review process (ULURP). Full ULURP review would allow for significant community input and the ability to dramatically shape any proposed future development in the predominantly medium density, deeply affordable neighborhood.

Director Weisbrod responded to this request on August 11, 2016, informing elected officials and the community of the department's determination that the proposed projects did not warrant full public review and would proceed through the minor-modification process at the City Planning Commission. Additionally, the department announced that the projects would need to undergo full Environmental Review per the City Environmental Quality Review law (CEQR) and would be required to prepare an Environmental Impact Statement (EIS).

DCP also announced that the development teams with proposals in the LSRD would commit to additional efforts to engage with the public in an "EIS plus" process.

Ongoing efforts by local resident leaders to galvanize into a coalition to significantly impact any proposed development eventually led to the formation of a community task force. Composed of resident leaders and a few key local organizations, this task force proposed to act as a conduit for community voices, to impact the proposed additional engagement, and to advocate for community priorities and preferences during discussions around the EIS and beyond.

The TF designed a community survey with several goals in mind including deepening engagement with and understanding of the EIS process, identify and measure community concerns and priorities, and take a first look at preferences in key issue areas. Questions sought to capture a respondent's relationship to the area, level of prior engagement with the development proposals, concerns relating to sections in the Environmental Review, and issues previously identified as priorities in community discussions. This summary reflects the significant results of that survey effort, with data tables appended. This document is intended to be a useful tool for local residents, community organizations, city-wide advocacy groups, elected officials, and impacted agencies for public testimony, advocacy, and ongoing discussions informed by community-based planning in the Two Bridges neighborhood.

Method:

- Two Bridges Community Task Force wished to develop a survey to achieve several goals:
 - Help resident leaders gather information and discuss proposed developments and process with their neighbors.
 - Help elected offices & TF as a whole to develop community drive platform for advocacy during EIS process and beyond
 - Use concrete data to support scoping and other public comments
- Using preliminary data from Karp Strategies twobridgeseis.com regarding the frequency and number of questions and comments received during Community Engagement Meetings 1 & 2, a survey was designed to capture data about the community's greatest concerns and priorities with regard to the proposed developments in the Two Bridges Large Scale Plan.
- The survey was designed in three parts:
 - Information about respondents: Who are they, what is their relationship to the Two Bridges neighborhood? If they are residents, how long have they lived here and in which developments? Have they engaged in any part of the process to date?
 - Information about respondents concerns and priorities with regard to the proposals: Two questions were designed to capture data roughly corresponding to the 18 study areas of the CEQR manual.

- Information that dives more deeply into community preferences around specific issues already identified as being of great concern. This data was extrapolated from the results of CEM 1 and 2 and revealed a majority of concern in five areas – Business & job growth; affordability; community facilities; transportation needs; and open space.
- The survey was translated into Chinese and Spanish, in order to reach the majority multi-lingual and/or limited English proficiency households in the neighborhood.
- The survey was distributed in a variety of forums during the months of March and April:
 - Resident leaders worked with their specific building populations via door to door canvassing, tabling, and peer to peer discussion
 - Elected officials and task force members conducted survey efforts at a selection of tenant association & special meetings.
- Total of 422 surveys collected in all three languages.
- Data was entered and coded during April – May. Due to inconsistent recording of scale values, all data points coded as value of '1' to indicate interest/concern/priority.
- Analysis of data has been tabulated based on a variety of population and geographic characteristics:
 - Overall (*Overall*)
 - Within/outside of the LSRD
 - By specific development (*Or across developments*) (*Or when comparing individual developments*)

Analysis

Respondents are overwhelmingly long -time residents:

- A total of 320 (76%) respondents identified as living in the Two Bridges neighborhood.
- Of these, 236 (74%) have lived in Two Bridges for 20 years or more.
- 307 (73%) of all respondents live within the LSRD

Prior Engagement:

- The survey effort reached 218 people, a total of 52% of all respondents, who had not otherwise engaged with the proposals, or the EIS process.
- Generally it would appear that respondents living within the LSRD have slightly higher rates of prior engagement than those outside, with 50% compared to 27% of respondents saying they have attended some meeting about the projects or process, respectively.

Priorities: Concerns about Development

- The top five OVERALL PRIORITIES (Table 7):
 1. Affordability of the neighborhood
 2. Transportation
 3. Impact of Construction
 4. Height of Buildings/Shadows/Impacts to views
 5. Air Quality
- Whether the data is analyzed in terms of overall respondents, differences between LSRD and neighbors, or by individual developments, the affordability of neighborhood (rising rents, displacement, secondary) is the top concern
- Public Health and Neighborhood Culture consistently rank in the top 3 concerns across developments within and outside of the LSRD (Table 26)
- Overcrowding and schools also often comes up as a top concern across developments (Table 26)

Priorities: What is Missing From The Neighborhood

The top five OVERALL things that are missing (Table 8):

1. Affordable, healthy food
2. Police and Other Safety measures

3. Affordable, quality housing
 4. Better transportation & alternatives
 5. Affordable retail
- Affordable and better transit consistently rank in the top three across all developments (Table 27)
 - Open and green space, senior activities, ADA access, and cultural spaces often rank in the top three.
 - Cultural spaces appear to be more of a priority for those within the LSRD

Preferences:

- **Business & Job Growth:**
- *Overall*, respondents value long term stability with retail and security & and training for local residents. (Table 9)
- Training for local resident, small business incubators and construction jobs in any and all new developments *rank across developments* (Table 28)

Affordability:

- *Overall*, respondents value low cost goods and housing (Table 10)
- Low cost affordable housing is consistently **ranked a higher priority** than more total units of affordable housing *across developments*. (Table 29)
- Additionally, low cost local retail and food remain priorities. (Table 29)

Community Facilities:

- Affordable sports/exercise facilities & senior resource centers are top priorities. (Table 11)
- Community meeting space is a slightly higher priority for *those outside of the LSRD*. (Table 21)

Transportation needs:

- *Overall*, elevator access at East Broadway F train, affordable parking, and connecting seniors and people with disabilities to the MTA are each top priorities. (Table 12)
- Elevator access at East Broadway is a higher priority for *those within the LSRD*. (Table 22, Table 31)

Open Space:

- Green/Open space and recreational waterfront access are crucial. (Table 12.1)
- Green space is a higher priority *outside of the LSRD*, but only slightly. (Table 32)

Tables:

TABLES BY OVERAL RESPONSE

1. Table 1: Surveys Completed By Language:
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TABLES BY OVERAL RESPONSE

Table 1: Surveys Completed By Language:		
	% Response	Total Responses
ALL		422
English	65%	262
Chinese	34%	142
Spanish	4%	18

Table 2: Respondent Self-identifies as Resident of Two Bridges Neighborhood		
	% Response	Total Responses
Total Residents	76%	320
For Less than Five Years	11%	34
1-10 Years	15%	47
11-20 Years	26%	83
20 Years Or More	74%	236
*% calculated based on 320 self-identified residents		

TABLES BY OVERAL RESPONSE

Table 3: Respondent Self-identifies as Other Stakeholder in Two Bridges		
	% Response	Total Responses
I am a property Owner here	6%	27
I am a Student Here	4%	18
I am an	4%	17
I used to live here	5%	19
A close family member lives here	7%	31
I work here	4%	18
I own a business here	0%	2
Other	1%	5

Table 4: Respondent Self-identified Resident Location by Geography		
	% Response	Total Responses
Within LSRD	73%	307
Outside or Not Identified	27%	115

TABLES BY OVERAL RESPONSE

Table 5: Respondent Self-identified Resident Location By Developments		
	% Response	Total Responses
80 Rutgers Slip: Two Bridges Senior Apartments	13%	54
82 Rutgers Slip: Two Bridges tower	14%	59
Lands End I	9%	39
261-271 South Street: Lands End II	25%	107
Two Bridges Townhouses	5%	23
286 South Street: Two Bridges NYCHA	6%	25
Area NYCHA Resident	10%	41
Other	13%	53

Table 6: Overall Respondent Attendance of CEM or Other Meetings*			
	% Responses to THIS Question (403)	% Total Respondents to Survey (422)	Total Responses
Yes	46%	44%	185
No	54%	52%	218

* Survey did not specify, responses reasonably could include tenant & other.

TABLES BY OVERAL RESPONSE

Table 7: Priorities: Concerns About Proposed Development On Waterfront (In Ranked Order)			
	% Total Respondent	Total Responses	Rank Order
Affordability of neighborhood (rising rents, displacement or secondary displacement)	68%	285	1
Transportation (ex. subway, Busses, Parking)	55%	232	2
Impact of construction (ex. disruptions due to construction, timing of projects, dust & noise)	50%	209	3
Height of building/shadows/views	47%	197	4
Air Quality (ex. Air pollutants)	43%	180	5
Noise (ex. extreme traffic changes)	41%	174	6
Open and green space (ex. parks, playgrounds)	38%	159	7
Public Health (ex. exposure to contaminants)	36%	151	8
Neighborhood character and culture	30%	125	9
Infrastructure (ex. water, sewer, sanitation)	27%	116	10
Influx of new residents	27%	115	11
Overcrowding Schools/Day Care	23%	99	12
Local businesses being displaced	19%	80	13
Climate Change & Waterfront Resiliency	17%	72	14
Waterfront access	15%	64	15
Hazardous Materials	15%	62	16
Historic resources/architecture	10%	43	17
Other	3%	13	18

TABLES BY OVERAL RESPONSE

Table 8: Priorities: What is Missing for you in your community? (In Ranked Order)			
	% Total Respondent	Total Responses	Rank Order
Affordable, healthy food (grocery stores, farmers markets)	66%	280	1
Police & other public safety measures	48%	202	2
Affordable, quality housing for local families	47%	200	3
Better transportation & other alternatives	46%	194	4
Affordable retail stores (clothing, pharmacy, etc.)	41%	172	5
Open and green space	37%	157	6
Senior activities, educational programs & services	36%	152	7
Accessible resources for people with disabilities (shuttle buses, F train elevator)	36%	150	8
Schools, educational resources, after-school and youth programs	32%	135	9
Cultural spaces & activities	24%	101	10
Building maintenance	20%	86	11
Community participation	17%	72	12
Jobs & Jobs training	16%	69	13
Other _____	4%	17	14

TABLES BY OVERAL RESPONSE

Table 9: Priorities: What type of business & job growth do you want to see in the community?			
	% Total Respondent	Total Responses	Rank Order
Retail and security jobs at local businesses	67%	284	1
Training for local residents for tech jobs (coding, web design, etc.)	67%	284	2
Small business incubators for local residents	64%	272	3
Construction jobs on any new developments	51%	215	4
Art galleries supporting local artists	45%	191	5
Other _____	10%	41	6

TABLES BY OVERAL RESPONSE

Table 10: Priorities: What do you believe is needed to keep the neighborhood affordable for your community?			
	% Total Respondent	Total Responses	Rank Order
Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)	78%	328	1
Low prices for local retail (clothes, home goods, gas, etc.)	63%	264	2
Amount of affordable housing (more units available at various AMI levels)	62%	263	3
Price of affordable housing (at 10% AMI [\$16,210 for a family of 1] and below)	59%	251	4
Affordable parking spaces for locals	54%	229	5
Child day care, senior center, etc	50%	211	6
Small business planning support and improvements for local stores	37%	155	7
Other _____	3%	11	8

TABLES BY OVERAL RESPONSE

Table 10: Priorities: What do you believe is needed to keep the neighborhood affordable for your community?			
	% Total Respondent	Total Responses	Rank Order
Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)	78%	328	1
Low prices for local retail (clothes, home goods, gas, etc.)	63%	264	2
Amount of affordable housing (more units available at various AMI levels)	62%	263	3
Price of affordable housing (at 10% AMI [\$16,210 for a family of 1] and below)	59%	251	4
Affordable parking spaces for locals	54%	229	5
Child day care, senior center, etc	50%	211	6
Small business planning support and improvements for local stores	37%	155	7
Other _____	3%	11	8

TABLES BY OVERAL RESPONSE

Table 11: Priorities: What kinds of community facilities do you most want to see in the community?

	% Total Respondent	Total Responses	Rank Order
Affordable sports/exercise facility	72%	304	1
Senior resource center	71%	298	2
Health center	70%	297	3
Cultural spaces	60%	254	4
Community Meeting Space	56%	236	5
Job training center	50%	213	6
Other	4%	15	7

TABLES BY OVERAL RESPONSE TABLES BY OVERAL RESPONSE

Table 12: Priorities: What transportation needs are most important to you in the community?			
	% Total Respondent	Total Responses	Rank Order
Elevator or additional escalator service at East Broadway subway stop	81%	340	1
Affordable parking spaces for local residents	75%	318	2
More frequent subway and bus service	74%	311	3
Shuttle for seniors and people with disabilities to get to/from MTA stops	73%	309	4
Other _____	15%	62	5

TABLES BY OVERAL RESPONSE

Table 12.1: Priorities: What kinds of open space would you most like to see in your community?			
	% Total Respondent	Total Responses	Rank Order
Green space / park space	81%	343	1
Recreational access to the waterfront	77%	325	2
Playground	66%	277	3
Community garden	62%	260	4
Outdoor benches and tables	61%	259	5
Space for organized sports: basketball, tennis, soccer, handball courts	47%	200	6
Other _____	4%	16	7

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 13: Surveys Completed By Language:				
	Within LSRD		Outside LSRD	
	Total Responses	% Response	Total Responses	% Response
English	198	63%	62	67%
Chinese	103	33%	25	27%
Spanish	12	4%	6	6%

Table 14: Respondent Self-identifies as Resident of Two Bridges Neighborhood				
	Within LSRD		Outside LSRD	
Total Residents	Total Responses	% Response	Total Responses	% Response
For Less than Five Years	30	10%	4	5%
1-10 Years	32	11%	11	13%
11-20 Years	75	25%	6	7%
20 Years Or More	167	55%	61	74%

*% calculated based on 304 (LSRD) and 82 (Outside) self-identified residents

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 15: Respondent Self-identifies as Other Stakeholder in Two Bridges				
	Within LSRD		Outside LSRD	
	Total Responses	% Response	Total Responses	% Response
I am a property Owner here	27	9%	0	0%
I am a Student Here	16	5%	2	2%
I am an advocate/organizer/volunteer	8	3%	9	10%
I used to live here	13	4%	4	4%
A close family member lives here	21	7%	7	8%
I work here	8	3%	10	11%
I own a business here	0	0%	2	2%
Other	2	1%	0	0%

Table 16: Respondent Attendance of CEM or Other Meetings*				
	Within LSRD		Outside LSRD	
	Total Responses	% Response	Total Responses	% Response
Yes	158	50%	25	27%
No	144	46%	61	66%

* Survey did not specify, responses reasonably could include tenant & other

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 17: Priorities: Concerns About Proposed Development On Waterfront (In Ranked Order)			
	Within LSRD	Outside LSRD	Overall
	Rank Order	Rank Order	Rank Order
Affordability of neighborhood (rising rents, displacement or secondary displacement)	1	1	1
Transportation (ex. subway, Busses, Parking)	9	8	1
Impact of construction (ex. disruptions due to construction, timing of projects, dust & noise)	7	9	1
Height of building/shadows/views	12	6	1
Air Quality (ex. Air pollutants)	16	14	1
Noise (ex. extreme traffic changes)	4	3	6
Open and green space (ex. parks, playgrounds)	10	7	7
Public Health (ex. exposure to contaminants)	3	2	8
Neighborhood character and culture	2	4	9
Infrastructure (ex. water, sewer, sanitation)	8	5	10
Influx of new residents	13	13	11
Overcrowding Schools/Day Care	6	6	12
Local businesses being displaced	5	5	13
Climate Change & Waterfront Resiliency	16	11	14
Waterfront access	14	10	15
Hazardous Materials	11	8	16
Historic resources/architecture	15	12	17
Other	18	15	18

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 18: Priorities: What is Missing for you in your community? (In Ranked Order)			
	Within LSRD	Outside LSRD	Overall
	Rank Order	Rank Order	Rank Order
Affordable, healthy food (grocery stores, farmers markets)	8	7	1
Police & other public safety measures	6	5	2
Affordable, quality housing for local families	1	1	3
Better transportation & other alternatives	4	2	4
Affordable retail stores (clothing, pharmacy, etc.)	10	10	5
Open and green space	3	3	6
Senior activities, educational programs & services	2	4	7
Accessible resources for people with disabilities (shuttle buses, F train elevator)	7	9	8
Schools, educational resources, after-school and youth programs	6	6	9
Cultural spaces & activities	5	8	10
Building maintenance	12	12	11
Community participation	9	9	12
Jobs & Jobs training	11	11	13
Other	13	13	14

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 19: Priorities: What type of business & job growth do you want to see in the community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Retail and security jobs at local businesses	4	4
Training for local residents for tech jobs (coding, web design, etc.)	2	2
Small business incubators for local residents	3	3
Construction jobs on any new developments	1	1
Art galleries supporting local artists	5	5
Other _____	6	6

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 20: Priorities: What do you believe is needed to keep the neighborhood affordable for your community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)	5	3
Low prices for local retail (clothes, home goods, gas, etc.)	3	2
Amount of affordable housing (more units available at various AMI levels)	7	5
Price of affordable housing (at 10% AMI [\$16,210 for a family of 1] and below)	1	1
Affordable parking spaces for locals	2	4
Child day care, senior center, etc	4	7
Small business planning support and improvements for local stores	6	6
Other _____	8	8

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 21: Priorities: What kinds of community facilities do you most want to see in the community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Affordable sports/exercise facility	2	3
Senior resource center	1	1
Health center	4	5
Cultural spaces	5	6
Community Meeting Space	3	2
Job training center	6	4
Other _____	7	7

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 22: Priorities: What transportation needs are most important to you in the community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Elevator or additional escalator service at East Broadway subway stop	2	4
Affordable parking spaces for local residents	3	2
More frequent subway and bus service	4	3
Shuttle for seniors and people with disabilities to get to/from MTA stops	1	1
Other _____	5	5

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 23: Priorities: What kinds of open space would you most like to see in your community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Green space / park space	2	1
Recreational access to the waterfront	1	2
Playground	4	4
Community garden	3	5
Outdoor benches and tables	5	3
Space for organized sports: basketball, tennis, soccer, handball courts	6	6
Other _____	7	7

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

	Within LSRD						Outside LSRD			
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
English	0%	92%	97%	59%	87%	69%	65%	83%	75%	60%
Chinese	98%	5%	3%	36%	13%	22%	35%	0%	25%	7%
Spanish	2%	3%	0%	6%	0%	9%	0%	17%	0%	33%

	% Response	Responses
Rutgers Houses	4%	17
LaGuardia Houses	1%	6
Knickerbocker Village	10%	44
Vladeck Houses	4%	15

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 26: Priorities: Concerns About Proposed Development On Waterfront (In Ranked Order)										
	Within LSRD						Outside LSRD			
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Affordability of neighborhood (rising rents, displacement or secondary displacement)	1	1	1	1	7	1	1	1	1	1
Transportation (ex. subway, Busses, Parking)	9	9	6	6	7	8	4	4	8	5
Impact of construction (ex. disruptions due to construction, timing of projects, dust & noise)	7	5	3	7	9	4	4	3	6	/
Height of building/shadows/views	12	7	10		8	10	4	3	4	6
Air Quality (ex. Air pollutants)	16	14		13	10	12	7	/	11	9
Noise (ex. extreme traffic changes)	4	3	5	4	4	7	6	3	3	4
Open and green space (ex. parks, playgrounds)	10	8	9	11	4	5	9	3	3	5
Public Health (ex. exposure to contaminants)	3	2	3	5	2	2	3	1	2	2
Neighborhood character and culture	2	4	2	2	1	3	2	3	4	7
Infrastructure (ex. water, sewer, sanitation)	8	6	7	4	3	6	4	5	5	3
Influx of new residents	13	10	8	12	10	12	8	/	9	8
Overcrowding Schools/Day Care	6	6	3	3	3	4	6	2	5	5
Local businesses being displaced	5	6	4	4	5	4	3	5	7	4
Climate Change & Waterfront Resiliency	16	13	12	10	9	9	6	5	9	6
Waterfront access	14	12	9	9	9	13	5	/	5	9
Hazardous Materials	11	13	7	8	6	5	4	4	7	6
Historic resources/architecture	15	11	11	14	9	11	9	/	10	8
Other	18	15	13	15	11	14	10	/	/	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 27: Priorities: What is Missing for you in your community? (In Ranked Order)										
	Within LSRD						Outside LSRD			
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Townhouses	NYCHA	Houses	Houses	Village	Houses
Affordable, healthy food (grocery stores, farmers markets)	10	4	4	7	3	5	3	5	8	2
Police & other public safety measures	6	4	5	3	4	5	6	5	3	2
Affordable, quality housing for local families	3	1	1	1	1	1	1	1	2	3
Better transportation & other alternatives	8	3	2	2	7	2	1	5	1	1
Affordable retail stores (clothing, pharmacy, etc.)	10	7	13	9	5	3	5	5	9	3
Open and green space	4	2	9	3	4	2	3	2	2	4
Senior activities, educational programs & services	1	6	6	5	2	3	2	2	4	1
Accessible resources for people with disabilities (shuttle buses, F train elevator)	2	11	8	4	7	3	4	5	9	3
Schools, educational resources, after-school and youth programs	5	8	7	6	4	4	3	3	5	5
Cultural spaces & activities	7	5	3	3	4	2	4	5	7	6
Building maintenance	11	9	11	10	9	8	5	4	10	/
Community participation	9	10	10	7	6	6	3	4	6	8
Jobs & Jobs training	11	10	12	8	8	7	5	5	11	7
Other	/	12	14	11	/	/	/	/	/	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 28: Priorities: What type of business & job growth do you want to see in the community?										
	Within LSRD					Outside LSRD				
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Retail and security jobs at local businesses	4	3	3	5	3	5	3	1	5	3
Training for local residents for tech jobs (coding, web design, etc.)	1	1	2	3	1	3	2	2	2	1
Small business incubators for local residents	2	2	3	1	1	2	1	1	3	4
Construction jobs on any new developments	3	1	1	2	2	1	2	1	1	2
Art galleries supporting local artists	5	4	4	4	4	4	4	3	4	5
Other _____	6	5	5	6	5	/	/	/	/	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 29: Priorities: What do you believe is needed to keep the neighborhood affordable for your community?										
	Within LSRD				Outside LSRD					
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)	6	4	2	3	7	2	3	1	3	1
Low prices for local retail (clothes, home goods, gas, etc.)	7	2	3	1	5	3	2	2	2	3
Amount of affordable housing (more units available at various AMI levels)	5	6	7	6	6	7	4	3	5	4
Price of affordable housing (at 10% AMI [\$16,210 for a family of 1] and below)	1	1	1	2	4	1	1	2	1	2
Affordable parking spaces for locals	2		5	3	3	4	3	3	4	1
Child day care, senior center, etc	4	3	4	4	4	6	5	1	7	5
Small business planning support and improvements for local stores	3	5	6	5	2	5	5	2	6	3
Other	8	7	8	7	8	8	/	/	/	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 30: Priorities: What kinds of community facilities do you most want to see in the community?

	Within LSRD						Outside LSRD			
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges	Two Bridges	Rutgers	LaGuardia	Knickerbocker	Vladeck
Affordable sports/exercise facility	1	5	2	2	2	1	3	3	3	1
Senior resource center	5	1	1	3	1	4	2	1	1	2
Health center	3	2	5	4	4	3	5	4	5	3
Cultural spaces	4	3	4	5	3	5	6	3	4	4
Community Meeting Space	2	5	3	1	2	2	5	2	2	1
Job training center	6	4	6	6	4	6	1	1	6	4
Other	7	6	7	7	5	7	/	/	/	/

Table 31: Priorities: What transportation needs are most important to you in the community?

	Within LSRD						Outside LSRD			
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Elevator or additional escalator service at East Broadway subway stop	3	1	1	2	3	4	4	2	2	2
Affordable parking spaces for local residents	4	3	3	1	1	1	3	3	1	1
More frequent subway and bus service	1	4	4	3	4	3	2	4	3	3
Shuttle for seniors and people with disabilities to get to/from MTA stops	2	2	2	4	2	2	1	1	1	1
Other	5	5	5	5	/	5	/	/	4	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 32: Priorities: What kinds of open space would you most like to see in your community?

	Within LSRD						Outside LSRD			
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Green space / park space	2	1	2	3	1	2	1	2	1	3
Recreational access to the waterfront	1	2	4	1	1	1	1	3	2	1
Playground	4	5	5	2	1	4	2	5	3	4
Community garden	3	3	3	4	2	3	3	1	5	3
Outdoor benches and tables	4	4	4	5	3	4	1	1	4	2
Space for organized sports: basketball, tennis, soccer, handball courts	5	1	2	6	3	5	2	2	6	5
Other	/	/	7	7	/	/	/	/	/	/

Comments:

1. What is the MOST IMPORTANT thing about the Two Bridges neighborhood to you?

Affordability
Keeping low obesity, safety, cleanliness, nice waterfront, affordability
Safety Waterfront, more business grocery stores, bars, restaurants, seating
Displacement, affordability
Overall community environment - not too much noise, garbage, etc.
Open Space
Lack of food supermarket
It's a family-friendly neighborhood

Affordable housing, green space

Affordable shop and rental
Yes
Crime rate is low/safety, good public security

Affordable Housing
Affordable housing
Affordable housing
The old time neighborhood feel - community
Family, community, affordability
History affordability, housing and safety my neighbors, and affordability of living in the city.
Affordability, ethnic diversity. Two Bridges has been a safe haven for people of color, people of lower economic means and these new developments with their influx of wealthy residents will destroy that
Keeping a sense of community

Remaining a stable community

Diversity and access to community programs.
Services for the youth within the community
Affordability
Families/ quietness
I don't know
Low Cost Housing
Low cost of living
Affordability, Diversity, Safety. We need our neighborhood businesses and residents to

remain affordable & service needs to longtime residents - not the residents that property developers are targeting w/ high income
Affordable rent low income and elderly residents
Diversity of cultures, family oriented, affordable housing
Overcrowding, Crime + Air Quality
Affordability
The Quietness & the affordability of the neighborhood
Community Diversity. Authenticity. The fact there is no Starbucks.
The space. The Affordability. The History. The park space.
The fact people have lived here 10,20,10 + years. Have raised their kids here and they're raising their kids here. It just feels more like a community than anywhere in Manhattan and that's appealing
Convenience of location via subway/ Bus or walking especially as it affect travel to Manhattan and workplace. Affordable housing and feeling of the community and understanding of different cultures and respect for older people and seniors in the neighborhood
good housekeeping, good security and good hospitality Peaceful surrounding
Too much ongoing construction, gentrification makes it unaffordable to low income groups
Maintaining the flavor of the neighborhood/diversity/affordability.
Overcrowding stability of ground foundation
Safety! Would like to see a reduction in gang activity and drugs, as well as robberies and other crimes. Madison, Montgomery, Clinton Streets are very dangerous. New residents at 271 south seem to be oblivious of these ongoing issues. The security team at 271 south is aware of the smell of marijuana in the building, multiple instances of which have been

brought up by residents. the security team prior to Nelson management lacks in this area it is like a village, not overcrowded. There is almost everything you would want in the community where you live. You may not know people by name but you recognize your neighbors.

The view of the waterfront, accessibility to local businesses, and Pathmark when it was still there Quiet, less congestion, less people

Rents

Safety

Increased Rent

Affordability

Safety

#1 Diversity and convenience

safety

Family life

Peace and Quiet

We need a quiet, safe and with enough space environment to live Sense of community

Air Quality and noise

safety

My Building and community

affordable rent stabilization; preferential rent

After School & Summer Programs

Convenience

the most important issue is keeping the neighborhood affordable

Sport club, exercise

Preservation of park and recreation areas

Peaceful

Public security

Quality of life, security

Population explosion, living condition, transportation and sanitary condition

Home & Neighborhood safety

transportation subway, public schools

Overcrowding and neighborhood security

Maintaining quiet and safety

A quiet and safe neighborhood Its cultural mix and convenient transportation mainly residential

Community, homey - feel

Space and quiet

My ideal community

the family component

parking, environment, schools, a reasonable supermarket was not replaced

Lack of infrastructure resources.

Lack of access to see waterfront

it's very quiet, I don't want to move, I enjoy living here. it is home

not changing the character of the neighborhood

the beauty behind diversity

I love my neighborhood (yo amo a mi bario)

accessibility to surroundings for elder

It is quiet. We all get along with each other. I enjoy living here from being a child in school.

the strong and connected working class

immigrant community that has lived and thrived here for generations. We are a united

community. "remember 9/11" it is a stable neighborhood not transiant [SIC]

the ethics and morals of our community.

The traditions and culture in our neighborhood

My childhood family and memories.

Supporting the low income residents

Economic sustainability (fair & diverse), family based neighborhood (children & seniors)

Clean air

We have no idea what two bridges organization are responsible for

The diverse neighbors, people are pleasant, I like my studio apt

Low income housing

Quiet, overlooking the river, close access to public transportation, schools

The space & park in between 265 & 275 Cherry St.

1. Safety 2. Having large shopping mall (such as Pathmark Supermarket) 3. Convenient Transportation 4. More parking spaces
Public security

Surrounding environment and air quality
Supermarket
Affordable rent, convenient transportation, safety community
Rent, convenient parking, playground clean air, place for children
Rental, car park Crime amenities, playground, shopping, parking
Keeping white people out!!
Affordable housing
The People in the community
Having affordable housing for neighbors and long term residents
the diversity
more housing for low income families. Most importantly the families that have lived here should continue to live here regardless of their socioeconomic background
we need a supermarket that is affordable. The Pathmark was the best thing for this populated community
the deli
section 8 and affordability
Health, air quality, affordable parking lot
family and unity and neighbors Community environment and security
air quality and lower price living, parking and grocery
need translation
that the people living here are not kicked out of their homes due to high rent increases
too many high rises being built in a small area
want to be able to enjoy parks with my kids without feeling enclosed
parking lot is very needed
it is very clean community remains intact

Air quality
Quiet
Air quality

Public security
Every change is important for us
Rental, environment
Rental, environment
Air quality, affordable, convenient transportation and car park
Public security
Supermarket very important
The education and welfare of our youth/keeping it clean Convenience/ease of living for elderly. Clean air Growth & employment
safety
Affordability, supermarket, no overcrowding, noise, etc....
The Community :) and keeping it CLEAN :)
Diverse and affordable housing

The security here + friendly environment
Safety and easiness to train and bus and hospital
Safety Affordability, comfort, space, safety
Safety/Noise/Displaced Residents

Convenience + safety
Affordable rent + living space

Waterfront Access
The Environment
East River
That it stays affordable to live
Affordability
The Air Grocery Store
Affordability
Services that help the low-income people.
Affordability
people
Affordability
No Parking!
its proximity to work and its beautiful school, transportation, change(?)
The High Rent- Big Change
waterfront
affordability

That they begin considering the needs of us tenants. Be considerate of our community
Preserve affordable housing and quality education
cultural mix and accessibility to all the peoples foods etc. culture safety children facilities
Affordability
good neighbors
safety transportation cleanliness markets
That all things; food, rent, etc. remain affordable
affordable rent
Affordability
Affordable grocery shopping and affordable housing
Safe neighborhood, cleanliness Getting more stores to shop
Would I be able to live here anymore

affordability
Affordability
That we remain a diverse community as we have for over 10 years - that ppl who grew up here continue to be able to stay here
neighbors friendliness and culture
aff

NEEDS TRANSLATION

Affordable, small neighborhood feel
Safety, transportation Safety, Shopping, Parking
Health and Safety
Safety
Safety
I think the most important things are public security and clean environment.
Safety and peace, public security, environment and good air Public security, environment, safety and peace and good air Safety, Parking
Safety and security
Supermarket & Safety
Don't let me move away. I want to live here for a long time
Safety and peace, healthy body, fresh air and safe public security

Traffic & transportation Safety, safety and peace, convenient to see doctor and no more rental rise
Safety and peace
Safety and peace
Safety and peace
Safety & Shopping, Supermarket
Safe, convenient
Traffic & Transportation
Safety and peace
Safety Need Supermarket and food shopping
Power station noise, safety and public security
Air quality, environmental afforestation
Safety and peace, good air
Good air
Safety facilities, air quality, transportation, environmental afforestation and sanitation

Security issue, environmental pollution Security issue, air and environmental pollution
Security Shopping & parking & parks
Security issue, rental, air quality and environmental pollution
Convenient Transportation

Community Improvements to suit influx of residents and not thinking of those who has lived here for years
Supermarket, Safety, transportation
Supermarket, Safety, transportation
Safety, Supermarket, parking
safety, supermarket, transportation, parking
safety, transportation, supermarket
safety supermarket
safety, supermarket, transportation, parking
safety, supermarket, transportation, parking
Safety, supermarket, transportation
Safety, transportation, supermarket, parking
Safety, transportation, supermarket
Safety, traffic, parking, transportation
safety, transportation, traffic
safety transportation
safety, transportation, clean air Maintaining the affordability of the neighborhood and the quality of life of residents

Took my view away
overcrowded, expensive, rising rents
Daycare/Summer Camp, Various Services, Parks
& recreation, Safety
Access to seniors programs, bus + Trains

I lost my supermarket not enough schools,
hospital for the residents in the community
with this new building coming we would over
crowded

Supermarket

housing
New Supermarket affordable

2. What are your Top Five Concerns about the new developments along the waterfront, ranked 1-1

(Parking Conditions)

Quality of construction in case of natural disaster or terrorism, enforcement of building codes. Disaster:
flooding, impact of hurricane etc.

Noise reduction level of walls (not to be disturbed by parties of neighbors)

Ownership - affordable co-op

It is not fair that they are taking parking space from the community

There needs to be a place for people not living in any area to take their door to (illegible) their (illegible)

- overcrowding of people and traffic

Employment

I have been getting more dust in my apartment since construction has started

Elevator to Street from Subway F Train line

Rodents

Con-Edison – Plant

3. What is missing for you in your community?

Catholic Church for community to attend, parking conditions

Hospital

Health club

Outside FREE; Basketball, Handball, Tennis courts not for corporate use

Restaurants and delivery options

Proper traffic control

ownership - affordable co-op

Affordable diverse quality restaurants

Access to indoor community room/space to use for group/ organization meetings2 / parking

Adequate parking spaces

programs for teenagers

Parking supermarket

1 middle income housing 2. parking

4. Business & Job Growth

Gym classes

affordable cafes/restaurants that cater to the residents, not expensive restaurants or bars that mostly bring in
transient crowds

restaurants and other food service related jobs

Large scale supermarket (ex. Stop n shop) that would employ community members

Sanitation, cleaning the neighborhood
language for non-English speakers
Farmers market
teacher jobs
supermarkets
movie theaters
training in health care or government service jobs
Restaurants
Restraint
health care related
Better supermarkets
small business training
City jobs
clean air
no businesses keep all residential - less noise and congestion
baseball, etc. - kids play home
- different restaurants
supermarket
jobs for the youth
jobs and opportunities for the youth
health
jobs to not displace residents in general
supermarkets
Food
x more food options, restaurants
affordable grocery store 1. schools 1. parking for community members community outreach
Supermarket
Music Programs
Affordable Legal Services
Black Hair Salons
Business Development Opportunities
Supermarkets medical places
more middle schools
Big Box stores - Aldies/ Dollar Tree

5. **Affordability**

super market like stop n shop
affordable - co-op units ownership
Police presence in community
more volunteer based programs
low income 20k
middle income (AMI)

6. Community Facilities

- Fast food stores
- Youth Services
- Outside Basketball, Handball, Baseball, Tennis Courts not for crop use
- Rec Center
- Community recreation indoor/outdoor center with swimming pool (similar to Hamilton Fish Park pool on 128 Pitt St.)
- youth center
- basketball courts
- more local owned stores
- Children's center/camp
- parks
- Afterschool Programs

7. Transportation Needs

- KV residents with years at location should be provide parking spaces
- possible new bus line
- Elevator to the Street from the F train Station East Broadway
- Shuttle for low income
- More bicycle friendly safety and parking
- a trolley car running under south street to the seaport
- longer hours on M22 bus line
- more parking spaces
- public parking
- less cars, more bike and walk paths
- buses to better location and frequent buses
- Better taxi pick up
- shuttle buses to doctor visits
- additional transit stops along south street
- Complementary/ free shuttle along South St. to Financial District or Battery Park (i.e. Downtown connection bus)
- Affordable Parking Spaces
- Community Days
- more police presence walking from east Broadway towards Rutgers Slip towards my building (#32)
- Car Service
- More Police Presence
- on time service
- removal of bike lanes
- re-routing commercial traffic
- express subway line
- parking parking lot
- Local Jitneys?
- Bus stop on South Street
- Better maintenance of sidewalks

more parking
more shuttles
programs for youth
subway
Stop N Shop Major Super Markets
South Street Transit Service
water taxi
Ferry
(Ferry/water taxi)
elevators
better sidewalks
actual parking spaces
Only the f train is available locally and frequently is insecure on nights and weekends
water taxi
Affordable taxi
Safety
parking garages
shuttle - M22

8. Open Space

None, there plenty and our parking spots are being taken away
Fix up the open space we already have
Either Indoor/Outdoor swimming pool, well designed water sprinkler play space for kids
bbq, party room
"all"
"all" (to-do)
secure open space
fix up the FDR drive
pool
active parking
Performance Spaces

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TRANSPORTATION
YOUTH SERVICES

**Written Comments to the Department of City Planning on the
Draft Scope of Work for Two Bridges LSRD – CEQR No. 17DCP148M**

Thank you for this opportunity to provide testimony on the Draft Scope of Work (DSOW) for the projects proposed in the Two Bridges Large Scale Plan. I would also like to thank the Manhattan Borough President and my fellow elected officials, members of the public, and of the Two Bridges Community for submitting comments on the DSOW and committing to make their voices heard on these incredibly troubling proposals.

I am deeply concerned by the prospect of such out of scale developments proposed for the Two Bridges Neighborhood. More than 40 years ago, the Large Scale Development Plan was created, in addition to the Urban Renewal Area, as a mechanism to promote the development of middle and low income housing - the buildings standing along the waterfront today are the legacy of this policy, and provide a rich mix of housing for a variety of incomes. This diverse housing stock is key to the integrity of what we know as Two Bridges, and these proposals threaten to tip this balance and forever alter this neighborhood.

Now, at a time when this community most needs level-headed, thoughtful, and comprehensive planning to protect its identity, the Department of City Planning and the City Planning Commission have made the chosen to ignore the public in the ULURP process. The single other large-scale project that requires this type of an environmental review but not a thorough public one is a parking garage in Staten Island. **I urge you to consider the impact that these buildings will have on this historic bastion of affordability- on the people who live and work here now, not a future community of luxury apartment units and a meager offering of so called affordable housing largely out of touch with local incomes.** This Environmental Impact Statement (EIS) must take the most rigorous approach to the way it analyzes impacts, and one that reflects the priorities of this community.

In partnership with the Borough President and community leadership, my office conducted a community survey to deepen engagement with this EIS process, and to identify and measure community concerns and priorities. The highest priority of this community is preserving and honoring its legacy as an affordable and diverse neighborhood, where connections among longtime stakeholders form the bedrock of Two Bridges. Residents do not want 2,000 units of luxury housing; they want to know they will be able to stay here for generations to come. Residents want a clean train station with safe and accessible platforms, regular and reliable bus service, buildings that honor the modest scale of 20 to 30 stories, stores where they can shop for goods and services unique to the vibrant community here, safe open spaces, and access and views to the waterfront that have long given them the respite and assurance that only *home* can provide. We are not prepared to sacrifice all of this for the provision of a meager number of affordable units which are not guaranteed to provide housing at levels affordable to our

neighbors. We are not prepared to sacrifice Two Bridges to be a playground for the rich. We must have comprehensive, public review of these projects.

I still disagree with the determination that these proposals, which would practically double the dwelling units in the neighborhood while dramatically increasing the proportion of luxury units with out-of-scale buildings, constitute merely a 'minor modification' to the Large Scale Plan. **As such, I strongly urge the Department of City Planning and the City Planning Commission to reconsider our request that these projects undergo the full public review process (ULURP).**

With regard to the Draft Scope of Work for the Environmental Impact Statement, I have the following comments.

Lesser Density Alternative

The DSOW calls for A No Action Alternative, which describes the conditions that would exist in the future if the proposed actions were not implemented, a No Unmitigated Significant Adverse Impacts Alternative, and an "Analysis of Project Permutations".

An additional alternative, an "Alternative Size or Lesser Density Alternative" should also be studied which is consistent with surrounding neighborhood context of roughly 20 story buildings of low and moderate income housing in the immediate area.

The CEQR Manual provides that this alternative may be reasonable for projects for which the degree of potential impact is related to the size or density of the project. In fashioning an alternative size or lesser density alternative, the lead agency should not consider the size or scale of the proposed project as proposed by the project sponsor to preclude consideration of a smaller size or lesser density as a reasonable alternative. See CEQR Manual Chapter 23, Section.130.

The DEIS should acknowledge special conditions: historic intent of the Urban Renewal Plan, Urban Renewal Area, and Large Scale Residential Development

The CEQR Manual states that scoping documents should request input on special conditions or concerns that the lead agency should consider. See CEQR Manual Chapter 1, Section 232.2 (Public Comments on the Scope of Work.) A full and in depth analysis should take into account the scope and intent of the underpinnings of the former Urban Renewal Area (URA), Urban Renewal Plan (URP) and the existing Large Scale Residential Development (LSRD).

The City Planning Commission, when it imposed the URP, capped the floor area within the LSRD so that significantly less development was permissible than what the zoning would have allowed. In approving the LSRD, particular bulk regulations were waived on the basis of the relationships of the buildings to each other, which were part of a coherent plan. In fact, the applicable floor area and lot coverage rules are embodied in the existing LSRD. As a result of this historical treatment, all three proposals are now subject to commission authorizations and modifications of the LSRD. To most accurately analyze the environmental impacts of these proposed developments, they must be considered in the context of the previously approved

planning scheme for this area; thus, a full analysis of the history of City actions on the site must be conducted in the Land Use, Zoning and Public Policy analysis.

Actions

Approvals from HDC and HUD will be required in order for any of the tenants to be relocated to units nearby or in the new building. The Project Description portion of the DSOW fails to mention these approvals from HDC and HUD under the section entitled Actions Necessary to Facilitate the Proposal. This is a significant omission.

In addition, the scope and scale of the proposed developments call for multiple agency involvement to evaluate the environmental impacts. Only by working with partner agencies at the Federal (HUD, FEMA, EPA), State (DHCR, DEC, MTA), and City (DOT, DEP, NYCTA, NYCHA, ORR, HPD, DOB) levels can the Draft EIS accurately reflect the impacts and address mitigations related to these buildings, perhaps even finding a better solution than this out-of-scale and out-of-touch proposals.

Study Area

The DSOW should clearly identify the metes and bounds proposed for all study areas- currently none are defined for the analysis of socioeconomic conditions. For other study areas, in most cases the ¼ mile boundary suggested for certain chapters in the DSOW are insufficient. The boundary lines for the chapters on land use, open space, and transportation should be extended to a full ½ mile or more, and should be drawn to include housing stock in adjacent neighborhoods where upticks in landlord harassment and market rent increases are most likely to result from the influx of more than two thousand luxury market apartments.

Additionally, the proposed study area boundaries extend into the East River, resulting in half the study area being of unpopulated lands under water, while ignoring vast portions of adjacent neighborhoods with unprotected housing stock currently occupied by working class residents. Drawing the study area in this manner is inappropriate under these circumstances, and jeopardizes the wellbeing of our communities. The CEQR framework provides ample room for irregular boundaries that take into account the most vulnerable populations and resources. See CEQR Manual Chapter 4, Section 311, which provides in pertinent part as follows: “These general boundaries can be modified, as appropriate, to reflect the actual context of the area by including any additional areas that would be affected by the project or excluding areas that would not be.The study area does not have to be regular in shape.....Due to the specific characteristics of certain projects and the potential for geographically dispersed effects, even larger study areas may sometimes be appropriate.”

Neighborhood Character

The CEQR Technical Manual describes neighborhood character as follows: “Neighborhood character is an amalgam of various elements that give neighborhoods their distinct ‘personality’.” In addition to having personalities, neighborhoods are like ecosystems- the things that make them unique depend on a delicate balance of thriving networks between people and

place. **When thinking about the identity of Two Bridges, diversity and affordability are critical components.** In a survey conducted by my office in partnership with Borough President Gale Brewer and neighborhood leaders, these factors were cited multiple times as the *most important* aspect about the community. Respondents also frequently cited local retail that is affordable as well as culturally relevant, a sense of community with long-time residents and neighbors, the vibrant mix of families and peaceful surroundings as important factors in what makes Two Bridges *home*. The DSOW should look at the affordability levels of housing stock for the entire study area, including demographic information about who currently has access to that housing stock, and which populations are rent burdened or inadequately housed in order to set forth comprehensive solutions to the impact that four super-tall luxury towers will have on this ecosystem.

Urban Design

The public needs detailed renderings of the proposed buildings from many angles in order to understand their impact on urban design and neighborhood character. Views across from Brooklyn, and from the Brooklyn and Manhattan Bridges are essential, in addition to views from down key neighborhood streets such as East Broadway, Grand, Delancey, Allen, Rutgers, Clinton, and Montgomery Streets.

The CEQR Technical Manual focuses on components of a proposed project that may have the ‘potential to alter the arrangement, appearance, and functionality of the built environment’ (See CEQR Technical Manual Chapter 10). If there are any buildings to ever constitute a significant urban design impact, they are contained in this proposal. They will cast shadows on existing buildings and open spaces, cover residential windows, impede sight lines and dramatically alter the relationship of pedestrian experience to the built environment, forever changing the entire architectural context of the neighborhood profoundly. It is of paramount importance that the DSOW identify NYCHA and existing low and middle income housing as sunlight sensitive resources, designed and built in the LSRD and surrounding area to ensure that every unit had access to light and air throughout the day.

Socioeconomic Conditions: Residential Displacement

The DSOW erroneously states that the proposed projects would not result in any direct residential displacement. In this case, the lead agency should examine the proposal for direct residential displacement. The CEQR manual defines “direct displacement” as the involuntary displacement of residents from a site directly affected by a proposed project. The DSOW acknowledges that for Site 4(4A/4B), in preparation for the proposed project, ten apartments at 80 Rutgers Slip would be vacated and eventually relocated into the new building. The units would be vacated either as existing residents leave the 10 units, or by moving residents of these units to other units that become available in the building or in a nearby building. However, there is no real plan for the relocation of any tenants, as no nearby space has actually been secured, and it is not known whether any tenants would otherwise leave the units between now and the build year.¹ Even though the number of residents who will be directly displaced is low, the CEQR Manual provides that the lead agency may determine whether a higher or lower

threshold is appropriate under the circumstances. The Manual provides that Impacts from residential displacement may occur if the numbers and types of people being displaced would alter the socioeconomic character of a neighborhood and perhaps lead to indirect displacement of remaining residents. For all projects, the number of residents to be directly displaced by a project should be disclosed, whether or not the displacement impact is considered significant. See CEQR Manual Chapter 5 Section 321.1 Residential Displacement.

The DSOW calls for a preliminary assessment of indirect residential displacement. On page 21 of DSOW it states that a detailed analysis will only be done “if warranted.” However, the CEQR Manual instructs that “if the population increase is greater than 10 percent in the study areas as a whole or within any identified subarea, move onto a Detailed Analysis.” See CEQR Manual Chapter 5, Section 322.1. Because the project contemplates the introduction of 2,775 dwelling units to the project site, and because the number of dwelling units on the project site will be increased by more than 70 percent, the DSOW should acknowledge the need for a Detailed Analysis.

Open Space

The DSOW states that a detailed analysis will be done only “if warranted”. Chapter 7, section 340 of the CEQR Manual contemplates a detailed analysis where shortfalls in open space exist now or in the future, to identify whether the shortfalls are a result of the project. Here, the proposed project will remove parking lot and a playground, reduce distances between buildings, and fill in open areas with new buildings. The Manual provides “Where it is clear from the outset that the project would affect a particular type of open space or particular age group, the [detailed] analysis may focus on those issues.” Clearly, a detailed analysis is warranted.

Climate Change

The DSOW should require comprehensive analysis of the impact that the proposed developments, each with different hard and soft infrastructure proposals to address sea level rise and extreme weather events related to climate change, will have on existing efforts to plan for a resilient New York. Analysis should consider historic storms in the 100 and 500-year floodplains, severe weather events, and extreme sea level rise projections. Analysis should consider resiliency comprehensively- taking into account all of the following: The larger ongoing East Side Coastal Resiliency and LMCR projects, any planned or proposed resiliency measures implemented in NYCHA or other existing developments, and the measures contemplated by the proposed developments. Any approach other than a comprehensive one threatens the ability of the neighborhood to respond to and recover from severe weather events.

Community Facilities

The DSOW does not call for an analysis of health care facilities, Fire Department resources (including EMS) or Police protection. However, the CEQR manual provides that a detailed assessment of service delivery in all three categories should be conducted where “a proposed project would create a sizeable new neighborhood where none existed before.” See CEQR Manual Chapter 6, Section 100. The addition of 2,775 dwelling units at one time (there is no

phasing plan) should be viewed as the creation of a “new neighborhood” for the purposes of ensuring that there will be no unidentified adverse impacts in these areas and warrants a detailed assessment of the existing capacity to protect public safety and health.

Transportation

The transportation analysis outlined by the DSOW anticipates that detailed analyses for traffic, transit, pedestrians, vehicle/pedestrian safety, and parking for weekday peak periods would be required. However the scopes of these analyses are flawed. The EIS should take into account planned MTA summer, weekend, and extended construction -- especially on the Rutgers Tube later this year -- when considering analysis of transit impacts. The EIS should further contemplate these factors in light of the specifically low capacity of the existing East Broadway F-Stop, a station without ADA access, with crowded platforms and staircases, and with limited service many times of day. In a neighborhood with many seniors, mothers, and young children, lacking ADA access puts this community at risk. The EIS must coordinate with the MTA, DOT, and NYCT to ensure that these factors are studied and addressed.

Further, as the area is underserved by subway service, the EIS should consider other nearby stations which may receive increased ridership as residents and visitors may be willing to travel further for subway access. The CEQR Manual, in Chapter 16, section 331 says that the selection of analysis locations is a function of the proposed project, its geographical setting, size and scale. In this case, there is a need to define a primary study area and a secondary study area. The subway stop at Essex & Delancey streets should be included.

The preliminary analysis of parking resources within the proposed ½ mile study area is also flawed. Several of the parking lots included in the study area are closed, or planning on closing in the near future. Surface parking continues to be a persistent quality of life concern in the community, with existing parking lots at capacity with waiting lists, and street parking often at capacity as well. The EIS should consider that while parking is not required per the zoning, the new buildings can anticipate large influxes of new vehicles after completion, as well as disruptions to surface parking during construction.

Water and Sewer Infrastructure

The DSOW states that the existing sewer system serving the project sites will be described based on records obtained from DEP (e.g., sewer network maps, drainage plans). The existing flows to the Newtown Creek Wastewater Treatment Plan (WWTP), which serves the project sites, will be obtained for the latest 12-month period, and the average dry weather monthly flow will be presented. For storm water and CSO, the CEQR Manual directs the use of DEP matrices that require both wet and dry analyses. The wet weather monthly flow should also be presented. See CEQR Manual Chapter 13, Section 322.

Conclusion

Thank you for the opportunity to submit these written comments in addition to my remarks at the public scoping meeting held on May 25th, 2017.

I continue to disagree with the Department of City Planning, and feel that these proposals are anything but 'minor'. The Two Bridges Neighborhood and the Lower East Side are critical components of New York City's fabric and must not be sacrificed. City Planning must expand the scope of the EIS to reflecting the recent history of a community under siege- new developments, historic disinvestment in critical infrastructure, and climate change have fundamentally rocked the foundations of this place. It is unacceptable for the Scope of Work to ignore these facts.



**Testimony of State Senator Daniel Squadron and Assemblymember Yuh-Line Niou to the
Department of City Planning (DCP) Regarding the Two Bridges Large Scale Residential
Development (LSRD) Draft Scope of Work (DSOW)
May 25, 2017**

We represent Manhattan's Two Bridges neighborhood in the New York State legislature, Yuh-Line Niou in the Assembly and Daniel Squadron in the State Senate. Thank you for the opportunity to submit comments regarding the Two Bridges Large Scale Residential Development (LSRD) Draft Scope of Work (DSOW), which is part of preparing a draft Environmental Impact Statement (EIS) for the neighborhood.

We submit these comments to register serious concern about the proposed housing developments considered in this EIS process. The three developers seeking modifications to the LSRD are Cherry Street Owner, LLC (JDS Development Group and Two Bridges Senior Apartments LP, affiliate); Two Bridges Associates, LP (CIM Group and L+M Development Partners); and LE1 Sub LLC.

Since these developments were announced, the Lower East Side community, including Community Board 3, tenant associations and residents, have raised many questions regarding the LSRD plan. At multiple community meetings on these developments, residents have voiced their opposition to the LSRD plan. We echo this and ask the City to limit scale and require improving wherever possible.

In particular, the City should consider the following issues in the scoping process for the Two Bridges neighborhood.

I. NEIGHBORHOOD DENSITY

The Lower East Side has faced a construction boom in recent years, from Essex Crossing to the in-process Extell developments at 250 South Street, among others. Essex Crossing will include 1,000 residential apartments, as well as commercial and community space. The Extell project is a large luxury development that will include residential and commercial space. In addition, the New York City Housing Authority (NYCHA) recently announced plans to develop market rate and affordable housing at LaGuardia Houses adjacent to the Two Bridges neighborhood. Taken together, these development projects will bring thousands more units to the neighborhood, further stressing the community's affordability, infrastructure, schools, parking and transit. We strongly urge the City consider the cumulative impact from all of the nearby development in the EIS.

II. TRANSIT

The proposed buildings will have a significant impact on the neighborhood's streets and transportation infrastructure. The already strained nearby subway stations will see an increase in usage as these projects come online, including the East Broadway subway station on the F line, and the Grand Street Station on the B and D lines. The Delancey/Essex station is the only station in the area with an elevator. We are concerned that the neighborhood's bus and subway infrastructure are insufficient to meet the increased need.

III. AFFORDABLE HOUSING

The lack of sufficient affordable housing included in the Two Bridges LSRD and the potential housing displacement it may cause, continue to be top community concerns that we share. The Lower East Side, particularly the Two Bridges area, already lacks enough affordable housing to meet the demand of the neighborhood. It is critical that the City protect the current stock of affordable housing and secure additional affordable housing units.

IV. SCHOOLS

Given all of the development both proposed and already underway, the Lower East Side will see an increase in the number of families living in the community that our current schools, many already with capacity issues, will struggle to serve. The City must study the cumulative impact of all of the residential development, including at the Extell site, the Two Bridges LSRD, and LaGuardia Houses, on our already crowded schools.

V. INFRASTRUCTURE

Lower Manhattan, especially the Two Bridges community, was heavily impacted by Hurricane Sandy. Two Bridges and other parts of the Lower East Side experienced flooding, power outages, and additional disruptions due to the storm. Given the ongoing efforts by the City's Office for Recovery and Resiliency on the Lower East Side, particularly in Two Bridges, this draft EIS must take into account the different impacts on resiliency plans for the community, particularly the East Side Coastal Resiliency project. Additionally, the City should consider the impact of the development on its water infrastructure, including sewage treatment. Development that will exacerbate this already serious -- and unsolved -- problem is unacceptable.

VI. ACCESS TO SUPERMARKETS

The recent loss of the neighborhood's Pathmark supermarket, formerly located on Cherry and Pike Streets, was a heavy blow to the Two Bridges community. This supermarket offered affordable grocery options to the surrounding community, and many of our constituents relied on it for their daily shopping needs. Extell is now developing the site of the former Pathmark into a tower similar to those considered in this EIS. We strongly urge the City to consider the need for affordable food shopping options in the area. We are also concerned about small business displacement, potentially caused by these towers. The EIS should consider the neighborhood's reliance on small businesses, and the City must propose solutions to prevent any further displacement of the shops that serve the community and drive the neighborhood's economy.

VII. CONCLUSION

We, along with our elected colleagues, have called on the City to apply ULURP to the current Two Bridges LSRD, because ULURP includes significant community engagement. Such calls have been turned down. In the absence of a thorough land use review process, we believe that the proposed developments could have severe consequences for the community. This EIS, and other work by the City, must deeply consider those consequences, and the City must implement changes and solutions to preserve affordability, livability, and vital services for community.

Thank you for the opportunity to testify.



Two Bridges EIS Public Scoping Hearing
May 25th, 2017

Written Testimony of Melanie Wang, Chinatown Tenants Union Organizer
CAA AV Organizing Asian Communities

My name is Melanie Wang, and I am one of the Chinatown Tenants Union Organizer at CAAAV Organizing Asian Communities.

The Chinatown Tenants Union is a program of CAAAV Organizing Asian Communities. Our mission at the Chinatown Tenants Union is to organize rent-regulated residents of Chinatown in order to fight gentrification, including harassment and negligence that is standard practice amongst landlords in this neighborhood.

First and foremost, we at CAAAV support and endorse the concerns of residents of the waterfront with respect to the proposed buildings, particularly around construction and socioeconomic impact. However, the proposed buildings are also in close proximity to Chinatown, and as such we are deeply concerned over the increased pressure they will surely bring our working-class, immigrant neighborhood.

According to the draft scope of work, indirect residential displacement “can occur if a project either introduces a trend or accelerates a trend of changing socioeconomic conditions that lead to increased residential rents, which in turn may displaced a vulnerable population to the extent that the socioeconomic character of the neighborhood would change”. However, the rent data to be included in this assessment is limited to current market rate rents.

Our organization would like to stately plainly and clearly that it is by no means only market rate rents who face indirect residential displacement. In fact, landlords have additional incentive to seek means to increase rents, whether legally or illegally, in rent-regulated units. The higher the legal rent in a rent-regulated unit, the sooner it will become deregulated. In a gentrifying real estate market, this means tremendous economic opportunity for the landlord. Our organization and many other housing and tenant advocacy groups recognize a practice of predatory equity appearing now throughout our city. Predatory equity landlords are those who purchase rent-regulated building with the intention of raising rents and pushing out long-time tenants. These buildings are often heavily overleveraged upon purchase, and their profitability is thus dependent on raising regulated rents.

As an example, we can consider the three buildings at 72, 74 and 104 Forsyth which were first sold in 2012 to Marolda Properties from a Chinatown family landlord for \$9.8 million. These buildings are just within the 0.5 mile EIS study area. Marolda Properties resold the buildings to Caspi Development (also known as BP Forsyth LLC) in 2015 for \$24.4 million, a

price which The Real Deal reported as being 16 times the rent roll at the time¹. According to documents publicly available in ACRIS, Caspi Development just this month refinanced the buildings with a non-bank lender for an additional \$7.7 million. The rent-regulated units in these buildings have been largely emptied, and we have seen many of the units sitting vacant or awaiting higher-income tenants.

Nor are rising rents the only tool that landlords use to force tenants out. We cannot limit our analysis of indirect residential displacement vulnerability to rent burden because there are even more “costs” of living in rent-regulated units that are subject to the high-pressure real estate market and related gentrification. Examples of the costs that Chinatown tenants may experience include forced evictions, repeated harassment, building negligence, and buyout pressure from a landlord seeking to turn-over rent-regulated units or sell a building, to take advantage of rising real estate prices.

For example, we see often construction work used as a harassment tactic – with dust allowed to pile up so much that tenants face asthma attacks. Public hallways have been left unfinished for days, with insulation and electric wires open to the air. In a building at 123 Madison Street, by the Manhattan Bridge, I know of an apartment in which half of the tenant’s living room ceiling collapsed in May 2017, as she stood under it, due to gut renovation of her upstairs neighbor’s apartment – the neighbor who was evicted by the new landlord, R.A. Cohen & Associates, after living there for twenty-two years.

As a community-based organization engaged in deep housing organizing work and community-led planning, CAAAV is regularly witness to illegal tenant harassment, persistent buyout offers, and intentional building negligence. These practices are the concrete manifestation of speculation and real estate pressure, and they create constant stress and frustration in the lives of poor and working-class immigrant tenants. They occur both in buildings owned by small landlords looking to turn over their properties after many years, and in buildings owned by predatory equity firms.

In November 2016, State Attorney General Eric Schneiderman announced a suit against one such predatory equity firm, the aforementioned Marolda Properties, which had engaged in illegal tenant harassment tactics in a portfolio of buildings in Chinatown and the LES. CAAAV, working in partnership with University Settlement, Asian Americans for Equality and MFY Legal Services, organized tenants in those buildings in 2014 and 2015, and it was tenant organizing that ultimately led to Tenant Protection Unit’s investigation and later the Attorney General’s case against Marolda Properties.

Rent-regulated tenants are by absolutely no means immune to the pressures of socioeconomic change in their neighborhood. If anything, the rent-regulated population in Chinatown, being largely composed of working-class, non-English speaking, immigrant families and seniors, is more vulnerable than new market rate tenants with higher incomes. Language access makes it difficult for them to access information around their rights or to file complaints or legal challenges against their landlord. Poverty makes it difficult for them to take time off work to deal with housing issues, or to find more stable housing. Finally, the ethnic and cultural

¹ <https://therealdeal.com/2015/11/30/marolda-sells-three-building-les-package/>

social networks unique to Chinatown mean that if they leave the neighborhood, they will leave behind vital resources that enable them to have a full and meaningful life in New York City.

Considering all the above, our recommendations for changes to the scope of work are as such:

- Increase study area from 0.25 to 0.5 miles to include a greater portion of rent-regulated housing in the neighborhood.
- Study the potential impact on rent-regulated units. In addition to considering market-rate rents, study data sets such as eviction data from the past five years, applications for DOB alteration and demolition permits, complaints of tenant harassment, loss of rent-regulated housing, inventory of rent-regulated housing due to expire, local requests for Right to Counsel, and interviews with local housing groups.
- Consider the potential ripple effect impact of indirect business displacement on residential displacement, as residents lose access to affordable and immigrant-owned businesses.
- Look beyond income and rent burden to age, race, education, language, and immigration status to more accurately identify vulnerable populations in the study area.



Land's End One Tenant Association

275 South Street, New York, NY 10002 • Lobby Office

info@leota.org • www.leota.org

Public comment by Aaron Gonzalez , President of Lands End One Tenants Association (275 South Street) on the Draft Scope of Work for EIS of Two Bridges LSRD Thursday, May 25, 2017 CEQR# 17DCP148M

Thank you for the opportunity to provide comments related to the Draft Scope of Work for the Two Bridges LSRD proposal.

But the fact that we are here providing comments does not in any way mean that we are in agreement with these projects being built. As the representatives of the tenants of 275 South Street, we state on their behalf, that we are vehemently opposed to these proposed developments!

The DSOW states that a future build year of 2021, when the projects are anticipated to be completed and operational, will be examined to assess the potential impacts of the proposed actions.

With this date in mind the proposed study area needs to include two development sites being built or about to be built, and their numbers should be added to all EIS estimates. The Extell site has two buildings and a combined 1000 units. The other site is the NextGeneration NYCHA program at La Guardia houses. The building size is estimated at 35 stories with 500 units. Both of these fall within the 400 foot boundary study area.

We are not getting a true EIS without these 3 buildings added to the impact of all 19 CEQR categories.

Socioeconomic Conditions

These new hi-rise developments are being made for the affluent, in direct contrast to the original purpose of the Two Bridges Neighborhood. With 75% of the new tenants being market rate and Extell's \$1-3 million dollar condominiums the socioeconomic character is going to drastically alter. Two Bridges is a low-income neighborhood. In 2015 the median household income was \$35,201 and 35.5% of the population lived below the poverty level. The developers need to let us know what AMI percentage they are going to use. They keep using the word 'Affordable'. Extell's million dollar condo's are affordable, *for someone*. And when they come to the Two Bridges Neighborhood the Area Median Income will forever be changed. Thereafter when HUD determines the new AMI, it will truly no longer be affordable for us. This *Will* result in indirect residential displacement. That is why we feel the study area should be increased to half a mile and should include: eviction data for the past 5 years, complaints of landlord harassment and an inventory of local requests for Right to Counsel. This data is available from ANHD, ProPublica and the Furman Center. We need to look beyond income, to levels of educational attainment, rent burden, overcrowding and linguistic isolation to provide a more accurate picture of those made vulnerable by the addition of a new population with higher income.

The stores that provide our food, goods and services will become victims of indirect displacement as well. Their landlords will see these luxury developments and raise their rents and force those small businesses we rely on to be priced out for boutiques and fancy stores out of our price range. This will cause us to venture further out of our neighborhood in search of our needs and wants. The study area for secondary displacement needs to increase to a half-mile to include Chinatown, the Lower East Side, up to Delancey Street.



Land's End One Tenant Association

275 South Street, New York, NY 10002 • Lobby Office

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Public comment Daisy Echevarria, Vice-President of Lands End One Tenants Association 275 South Street, on the Draft Scope of Work for EIS of Two Bridges LSRD Thursday, May 25, 2017 CEQR# 17DCP148M

Traffic

Due to the proximity of our neighborhoods' namesakes, the Bridges, traffic is horrendous and dangerous. Cherry Street receives an overflow of traffic when the FDR is congested. Clinton Street is backed up from Delancey Street to the FDR with vehicles trying to get to the Williamsburg Bridge. What impact will the projects have on these traffic flows?

With the beautification of our neighborhood continuing more tourists than ever before are visiting. Tourists are not limiting themselves to weekday AM, midday and PM peak periods. There are also many out of town visitors going to Basketball City events or the cruise boat launch. Tour buses drop off passengers at the intersection of South and Montgomery streets. This causes both foot and vehicle traffic. There needs to be traffic analysis on the weekends, particularly when Basketball City is having an event.

Improvement measures at only identified high accident locations are not enough. For every accident there were countless near-misses. Any accident victim is one victim too many. Human life should not be reduced to a mere statistic. For this reason we need to expand the study area to a half-mile boundary. Let's comply with Mayor de Blasio's 'Vision Zero'. We need to be proactive in preventing fatalities or serious injuries in our city streets. Without cameras nothing will deter vehicles and their frustrated drivers from disobeying the rules of the road. Therefore anything that can be done to protect pedestrians should be implemented. The simplest approach would be to put stop signs, two-way or three-way at *All* pedestrian crossings with bright crosswalk markings on the street. With almost 9000 new residents and every life precious, it is imperative that Vision Zero in the Two Bridges Neighborhood become a reality right now.

Neighborhood Character

The Two Bridges neighborhood has long been a worker neighborhood, affordable and an ethnically diverse section of New York. Many of our residents, both short and long term have cited the family atmosphere as a reason they moved and stayed here. It's character will change with these developments. The heights of these structures are overwhelming us. They are absolutely out of proportion, with no regard to the surrounding area. Neighborhood character is directly tied to it's socioeconomic character. Unfortunately with the upper economic class an inherent sense of entitlement is prevalent. That's why there are 'Poor Door' buildings or as in Extell's case the millionaire's moving in will happily be completely isolated from the working class; six floors of amenities, even their dogs will be pampered, and a separate building for the working class.

There will be changes to our neighborhood character. Not changes we want. Should we be welcoming? The Indians of Manhattan, were welcoming. Where are the Manhattoes now?

L E S O N
L O W E R E A S T S I D E
O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

May 25, 2017

Re: Draft Scope of Work Comments

“Two Bridges large Scale Residential Development Area Project”

CEQR No. 17DCP148M

Pursuant to Section 5-07 of the Rules of Procedure for Environmental Review (CEQR) and 6 NYCRR 617.8 (State Environmental Quality Review), the New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC) as CEQR lead agency, has determined that a Draft Environmental Impact Statement (DEIS) is to be prepared for the proposed actions related to the development of the “Two Bridges Large Scale Residential Development Area Project” (CEQR No. 17DCP148M).

The three project applicants—Cherry Street Owner, LLC (an affiliate of JDS Development Group, and Two Bridges Senior Apartments LP); Two Bridges Associates, LP (a joint venture between CIM Group and L+M Development Partners); and LE1 Sub LLC—each seek modifications characterized as minor to the existing Two Bridges Large Scale Residential Development (LSRD) to allow for the development of three massive mixed-use buildings within the LSRD. The

As the CEQR lead agency, the Department of City Planning has requested the applicant[s] prepare or have prepared, at their option, a Draft Environmental Impact Statement (DEIS) in accordance with 6 NYCRR 617.9(b) and Sections 6-08 and 6-12 of Executive Order No. 91 of 1977 as amended (City Environmental Quality Review). A public scoping meeting has been scheduled for May 25, 2017, where the public and interested parties can provide input and comments.

The *Lower East Side Organizing Neighbors* (LESON) is a group of local leaders organizing and inspiring the residents of the Lower East Side and its surrounding areas at large to challenge the many issues directly and adversely impacting the current and future preservation of their homes, businesses, community organizations, clinics, senior centers, schools published services and overall quality of life.

LESON considers the Draft Scope of Work (DSOW) to be deficient in several key areas, and provides the following comments regarding necessary changes to and expansion of the DSOW necessary to conduct a fully compliant environmental impact statement prior to any issuance of the Two Bridges LSRD permits and authorizations under the Zoning Resolution, and construction of the Megatower Group can be otherwise permitted and undertaken.

**Comments on Scope and Preparation of the
Two Bridges Environmental Impact Statement (CEQR No. 17DCP148M, "Two Bridges EIS")**

Pursuant to Sections 5.03 and 5.05 of the City Environmental Quality Review Rules of Procedure, the Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), is assuming Lead Agency status for an application submitted by three developers to construct three luxury megatower residences inside the boundaries of the Two Bridges Large Scale Residential Development (Two Bridges LSRD) established in 1972 (CP-21885). This "Megatower Group" will add approximately 4,775 new dwelling units to a roughly nine acre LSRD currently sustaining approximately 1300 residences.

In addition to comments on the scope and sufficiency of the EIS, these comments will also highlight DCP's failure to date to clearly identify for the affected public all authorizations or special permits to be issued under Zoning Resolution Article VII, Chapter 8 needed to construct the planned megatowers in the Two Bridges LSRD, and reconcile those procedures to the data, information, and evidence developed for the Environmental Impact Statement. Public disclosures and explanations of New York City Zoning Resolution (ZR) requirements for the proposed projects have been fraught with discrepancies, inadequate public records release, and potentially misleading characterizations of zoning law governance and procedures.

Due process under the ZR, in particular the issuance of affirmative "Findings" (ZR 78-313), are conditions precedent to any authorizations and/or special permits, or modifications to existing permits, open space, and other features of the LSRD inherent to its success as a residential community. The ZR requirements are separate from the requirements to perform a legally sufficient EIS, but are interactive with the EIS process in that various environmental impacts identified in the EIS are substantive considerations for issuing the necessary Findings. This is particularly important in areas of socio-economic impact, air, light, shadows, and open space sustainment. In addition to submitting these comments, LESON will provide comments to DCP and all interested parties regarding proper procedures under the ZR for development in an LSRD.

I. Zoning Resolution Issues

The Notice of Lead Agency Determination and Review, dated March 27, 2017 (the "Notice") clearly states that the mapped zoning for the Two Bridges project area "is modified by the Two Bridges LSRD Plan..." and that "[l]arge scale plans are governed by the provisions of NYC Zoning Resolution Article VII: Chapter 8 (Special Regulations Applying to Large Scale Residential Developments)." The DCP Notice claims that "substantial updates or changes to a Large Scale Plan must be approved by the CPC through a minor or major modification process, depending on whether the changes require waivers or zoning actions not encompassed by previous approvals."

Various "Special Permits" under the applicable ZR Chapter have been previously issued to establish or change boundaries and other zoning features for "sites" within the LSRD. The CPC and DCP are asserting that such LSRD special permit actions – along with zoning "authorizations" enabled by the applicable ZR chapter – remain in effect, and the changes contemplated to allow a 400% increase in the density of the LSRD are "minor" modifications.

Issuance of special permits under the ZR is subject to Uniform Land Use Review Procedures (ULURP); authorizations are not. Zoning Resolution Chapter 8 further requires the issuance of affirmative "Find-

ings” as a condition precedent to the granting of any such modification in the form of “authorization” or “special permit.”

The DCP Notice and DSOW both fail to describe in sufficient detail the exact nature of the authorizations or special permits required or actually sought for the Megatower Group. In addition, based on procedures for the Two Bridges LSRD Plan and permits first issued by the City Planning Commission in CP-21885, further authorizations and special permits are only granted after public hearing, investigation, and study that provide adequate legal basis to determine that such authorizations and special permits “conform with the findings required under Section 78-313 of the Zoning Resolution...,” and a resolution is published by the CPC confirming such findings.

The legal responsibility to follow these procedures are separate from the Environmental Impact Analysis process. The Notice makes further assertions that appear to either confuse, conflate, overlook, or disregard the clear procedures and requirements of the controlling ZR:

- “The Two Bridges LSRD Special Permit was originally approved by the CPC on May 17, 1972 (CP-21885) and was last amended on August 23, 2013 (M120183 ZSM). The 2013 amendment was to allow for the development of a new mixed use building on Site 5, as well as the enlargement of existing retail use and the relocation of 103 existing accessory surface parking spaces into the new building. That proposed development did not occur. The LSRD Special Permit, as amended, remains in effect.”

The ZR section 78-07 (Lapse of Authorization or Special Permit) states that any authorization or special permit granted by the City Planning Commission pursuant to this Chapter shall automatically lapse if substantial construction has not been completed as set forth in Section 11-42 (Lapse of Authorization or Special Permit Granted by the City Planning Commission Pursuant to the 1961 Zoning Resolution). That section indicates substantial construction must occur within four years of permit issuance, absence certain circumstances. The DCP should clarify why it believes the authorizations and/or special permits or special permit modifications issued to the cancelled Healthcare Chaplaincy Project regarding Site 5 in the LSRD remains in effect, and have not lapsed consistent with the ZR.

- “The proposed projects do not require waivers or zoning actions not encompassed by previous approvals and each will proceed as a minor modification to the previously approved Two Bridges LSRD.”

The Megatower Group will add almost 5,000 new residences to an area currently occupied by about 1300 dwellings over an above the hundreds of apartments added by the Extell Tower. The DCP has accurately stated that the zoning on the sites is modified by the Two Bridges LSRD, establishing a non-controvertible requirement for issuance of necessary authorizations and special permits for any Location of Buildings, Distribution of Bulk and Open Space, Modification of Height and Setbacks, Total Floor Area, Lot Coverage, Dwelling or Rooming Units, Total Open Space required, and re-designation of zoning lots under ZR sections 78-311 and 78-312 that will occur as part of the three Megatower Projects. It is not clear why the DCP is using terms such as “waiver” or “zoning actions” when the controlling provisions of the ZR refer to “authorizations” and “special permits.”

Given the proposed actions will overwhelm the current density, character, open space, air, light, and multiple infrastructure systems of the LSRD, the attempt by DCP to label the proposed action “minor” is disingenuous, at best, and not supported by the sheer magnitude of the residential load under con-

sideration for the LSRD Plan area capacity. For the current Megatower Group DSOW and planned EIS, the applicants and DCP must clarify the following in order to ensure the community and interested parties are fully informed as to the LSRD-governed zoning changes needed for these projects to proceed, and which Zoning Procedures under ZR Article VII, Chapter 8 will be completed:

- Every separate “Authorization” or “Special Permit” that must be issued for each separate tower project, and the data, information, and evidence developed in the EIS that could support affirmative Findings under 78-313
- A full description of the current Location of Buildings, and volumes associated with distribution of Bulk and Open Space, Total Floor Area, Lot Coverage, Dwelling or Rooming Units, as well as Modification of Height and Setbacks, alteration of Total Open Space, Light, Air, Congestion, and all other current site and community planning aspects, features, components, and volumes that will be altered by issuance of any authorization or special permit under ZR 78-311 or 78-312
- Explanation of how the addition of 4,775 residential units to LSRD sites currently governed by special permits, authorizations, open space, and infrastructure systems sustaining 1,300 can be viewed as “minor” modifications to the LSRD

II. Environmental Analysis Requirements

1. Statement of Purpose and Need

The Draft Scope of Work fails to identify a purpose or need for the proposed action consistent with public benefits intended by the creation of an LSRD, or other benefits to the City of New York or its taxpayers. According to the New York State Environmental Quality Review Act (SEQRA), the description of the proposed action should contain “the purpose or objective of the action, including any public need for, or public benefits from the action, including social and economic considers, and identification of authorizations, permits and approvals required.” (6 CRR-NY 617.9(b)(5))

Although the DSOW describes the construction of three luxury megatowers, the DCP/CPC decision to grant authorizations or special permits would irrevocably alter the open space, bulk distribution, floor area, other infrastructure elements, and most importantly, the community character of a longstanding and successful LSRD. Therefore, Section C: Purpose and Need of the Proposed Action or the DSOW must describe the documented purpose and need for the megatowers themselves, and the concomitant issuance of any and all authorizations or special permits under Zoning Resolution Article VII, Chapter 8 for this Megatower Group compliant with the provisions of ZR 78-01: General Purposes.

In addition, given the application of ZR sections 78-311, 312, and 313, the Statement of Purpose and Need should describe goals, outcomes, policies, or plans achieved by constructing this Megatower Group that the applicants and DCP are asserting or will assert as evidence the projects meet the requirements of ZR section 78-313: achieve the General Purposes of the LSRD formation itself; permit better site planning and benefit the LSRD residents and the City as a whole; prevent any bulk, population density, or use intensity detrimental to the nearby occupants; prevent restriction of air or light to nearby buildings or create traffic congestion; maintain the design purposes of pooled areas; assure suitable access to streets; or modify setbacks to impair the essential character of the of the surrounding area or have adverse effects on any neighbor’s access to air, light, and privacy.

2. Conformance with Law

The evaluation of environmental “impacts” includes public identification, disclosure, and analysis of any aspect of the proposed project[s] subject to laws other than SEQRA, especially those that extend beyond the impact category and represent potential for violations of, or compliance interference with, laws, regulations, Orders on Consent, Administrative Orders, or any other enforcement action issued by Federal, State, or municipal authorities covering the operation and management area of the project[s]. In the case of the Two Bridges Megatower Group, these include (but are not limited to) the Clean Water Act, the Clean Air Act, the Comprehensive Environmental Response Compensation and Liability Act, and the Federal Emergency Response Act.

The application of multiple legal requirements has particular bearing on the discretionary decision-making under the requirements of Zoning Resolution (ZR) of the City of New York Article VII, Chapter 8. In this case, the EIS will be required to contain sufficient evidence that the proposed action with confirm to the Findings required for issuance of Special Permit sought by applicants from the lead agency. The application of ZR Article VII, Chapter 8 noted above, and referenced throughout these comments.

III. Proposed Scope of the Environmental Impact Statement/EIS Content

1. Identification of adverse impacts

- ii. Short- and long-term effects, typical associated environmental effects, and adverse environmental impacts that “cannot be avoided” must include any and all resulting from construction, permanent alterations, operation, and maintenance of the proposed project, particularly those that can cause or contribute to compliance interference or violations of law by proponents or any agency of the City of New York.
- iii. Irreversible and irretrievable commitments of resources analyzed must include the construction, operations, and maintenance activities occurring during the useful life of the proposed project, including but is not limited to all affected airshed, airspace, water discharge carrying capacity, drinking water, land, open space, and light as well as City roads, schools, pipes, fuel/energy, and all other physical infrastructure systems, whether used in the immediate geographic area of the project, or used through transport, migration, distribution, or other direct and indirect means as assets and resources that would be involved and committed if the proposed project is built and operated over its useful life.

2. Segmentation

Part 617 of Chapter VI of the Codes, Rules, and regulations of the State of New York defines segmentation as the division of the environmental review of an action so that various activities or stages are addressed as though they were independent, unrelated activities needing individual determinations of significance. Except in special circumstances, considering only a part, or segment, of an overall action is contrary to the intent of SEQRA.

There are two types of situations where segmentation typically occurs. One is where a project sponsor attempts to avoid a thorough environmental review (often an EIS) of a whole action by splitting a project into two or more smaller projects. **The second is where activities that may be occurring at different times or places are excluded from the scope of the environmental review.** By excluding

subsequent phases or associated project components from the environmental review, the project may appear more acceptable to the reviewing agencies and the public. This Scope of Work must be revised to prevent this contravention of State regulation.

The Scope of Work for this EIS must include review of the construction of this Megatower Group, but also the full impact loading from every component of its operation and maintenance, including regular and repeated use of the full compliment of the City's land, air, water, and physical infrastructure *systems* accepting load from this construction, operation, and maintenance through its useful life. For example, the scope must cover use of wastewater treatment plant capacity, discharge carrying capacity of public waters, airshed capacity used for all aspects of transport, deliveries, and waste collection, etc. This full compliment of City system components extends well beyond the immediate blocks in and around the Two Bridges LSRD, and the failure to evaluate and analyze this full spectrum use would constitute improper segmentation.

In addition, segmented or insufficiently scoped analysis could result in insufficient evidence to issue legally supportable Findings under ZR Section 78-313.

3. Land Use, Zoning, and Public Policy

The proposed action under consideration in the Two Bridges EIS is the construction of three megatowers comprised of luxury residences inside the boundaries of the Two Bridges Large Scale Residential Development (Two Bridges LSRD) established in 1972 (CP-21885).

The Full Form EAS completed for this Two Bridges EIS states in Section 5 that this Megatower Group construction project requires a "Special Permit" that is a "minor modification to a previously approved LSRD." Consistent with requirements of Sections 200 and 201 of the City Charter governing the amendment, repeal, or addition to an existing Zoning Resolution by Authorization or Special Permit, the DCP website explains that "a special permit is a discretionary action by the City Planning Commission, subject to ULURP review, or the Board of Standards and Appeals, which may modify use, bulk, or parking regulations **if certain conditions and findings specific in the Zoning Resolution are met.**" (emphasis added)

- i. The LSRD Special Permit requested is a "Major" modification of the current LSRD bulk controls that are designed to optimize active and passive recreation, preserve scenic and natural features, foster a more stable community, ensure harmonious designs, and overall protect heath, safety, and general welfare of all LSRD residents.

It beggars belief that the addition of 4,775 new residences within a few square blocks, consuming vast areas of open space and light penetration for an established working class community, is characterized as "minor." The LSRD Special Permit requested imposes massive redistribution of bulk, height, open space, maximum developable floor area, lot coverage, dwelling units, air, and light in the current LSRD use allocations, and constitute a major change to the LSRD.

In addition to full ULURP review of said major change, DCP must adhere to the procedural requirements of the ZR. Given the overwhelming redistribution of Two Bridges LSRD capacity taken up by the Extell Tower project, the requirement to evaluate according to the preconditions of ZR section 78-313 are even more vital.

The DCP claim that a "Minor Modification" of an existing land use designation (to include an LSRD) "may alter elements of the prior approval, but without increasing the extent of any waiver or

modification of the underlying zoning regulations granted under the prior ULURP approvals, and **without requiring any new waivers or modifications of zoning regulations.**" This has caused no end of serious public misapprehension that the height, bulk, setbacks, dwelling units, population density and other key factors altering asset uses within the LSRD are to not subject to the standards set in ZR 78-313. The proponents and lead agency persist in demarcating this project in terms of whether the underlying surface zoning will be altered, when it well understands it is the LSRD that will developed virtually out of existence.

The lead agency and proponents have muddied the waters with two confusing variations the intricate and complex provisions of the City Charter and Zoning Resolution governing this action. The lack of height restrictions in C6-4 are modified by the ZR, and allowable building heights must be judged against the legal preconditions to preserve active and passive recreation, preserve scenic and natural features, foster a more stable community, ensure harmonious designs, and overall protect health, safety, and general welfare of all LSRD residents, not just those in the penthouses.

To add to the public confusion and obfuscation, the lead agency and proponents appear to be either conjunctively or alternatively claiming in the Notice that the "Special Permit" granted for the Health Care Chaplaincy project (M120183 ZSM) "remains in effect" despite ZR section 78-07 which specifically states that authorizations or special permits automatically lapse in the absence of "substantial construction." To the extent the City is claiming that the current project qualifies as a minor modification because it represents a minor set of changes from LSRD authorizations and permits approved for the Chaplaincy project, the "minor" characterization is unsupported. Further, as the Chaplaincy Project was never built, the assertion that its special permit remains in effect is also confusing to the public, at best, and risks being overtly misleading. It also has the unfortunately effect of creating the appearance of "bait and switch" – a special permit is granted for a fifteen story project, and switched to apply to a megatower.

- ii. The DCP, MOEC, and all regulatory and approval offices including the Office of the Manhattan Borough President must fully explain that the LSRD Modifications are subject to study, investigation, and hearing procedures for issuing Findings under ZR 78-313, and the Scope of the EIS should include or cross reference all evaluation of the project carried out under ZR sections 78-311, 312, and 313.

As noted above, the Two Bridges LSRD is governed by the provisions of Chapter 8 of Article VII of the *Zoning Resolution of the City of New York (ZR)*, the General Purposes of which are to set forth regulations "designed to deal with certain types of problems which arise only in connection with large-scale residential developments and to promote and facilitate better site planning and community planning through modified application of the district regulations in such developments." (Section 78-01).

Section 78-043 of the ZR describes the requirements for findings as affirmative standards constituting a burden of proof to be met by the proponents:

The requirements for findings as set forth in this Chapter *shall constitute a condition precedent to the grant of any such modification by special permit or otherwise.* The decision or determination of the City Planning Commission shall set forth each required finding in each grant of modifications for a large-scale residential development. *Each finding shall be supported by substantial evidence or data* considered by the Commission in reaching its final decision (emphasis added).

Sections 78-311 and 78-312 of the Zoning Resolution provides that the City Planning Commission may authorize modifications to open space, lot size, building location, height and setback, entrances, floor area ratios and other design and construction elements for the purpose of achieving better site planning and community planning, but only if the Commission can make findings in accordance with Section 78-313, which provides conditions precedent whose standards must be met with supportable data for such modifications:

- (a) that such modifications will aid in achieving the general purposes and intent of this Chapter as set forth in Section 78-01 (General Purposes);
- (b) that such distribution of floor area, dwelling units, rooming units, open spaces, locations of buildings, or location of primary business entrances, show windows or signs will permit better site planning and will thus benefit both the residents of the large-scale residential development and the City as a whole;
- (c) that such distribution or location will not unduly increase the bulk of buildings, density of population, or intensity of use in any block, to the detriment of the occupants of buildings in the block or nearby blocks;
- (d) that such distribution or location will not affect adversely any other zoning lots outside the large-scale residential development by restricting access to light and air or by creating traffic congestion;
- (e) where portions of the total required open space are pooled in common open space areas or common parking areas, that such common areas will, by location, size, shape and other physical characteristics, and by their relationship to surrounding development and the circulation system, permit realization of the full community service of advantages for which such pooled areas are designed;
- (f) where one or more zoning lots in the large-scale residential development do not abut mapped streets, that suitable private access to mapped streets will be provided conforming to standards which will ensure adequate circulation and make adequate provision for public services; and
- (g) the modification of height and setback will not impair the essential character of the surrounding area and will not have adverse effects upon the access to light, air and privacy of adjacent properties.

It is worth noting that the standards for these Findings correlate to many confirmed adverse impacts anticipated by the EIS. However, unlike environmental assessments that may only trigger so-called "mitigation," the consequences of construction, operation, and maintenance of this Megatower Group have a high probability of negatively implicating the purpose and intent of the LSRD formation, failing to benefit the nearby residents or City as a whole, increasing bulk and density to the detriment of occupants of nearby blocks, restricting access to air and light, and causing congestion, impeding realization of the full community service of advantages for which such pooled areas are designed, impairing the essential character of the surrounding area, and having adverse effects upon the access to light, air and privacy of adjacent properties, thus disqualifying the project from obtaining a Special Permit.

It bears repeating that the specific requirements of the ZR 78-311 and 312 procedures related to the issuance of “Findings” under section 78-313 has been obfuscated – at best – by both the Lead Agency and the applicant in the Draft Scope of Work, the EAS, and all other documents and assessments prepared for these projects. The Final Scope of Work should be updated to make clear that the ZR affirmative standards are applicable and must be met.

iii. Consistency Assessment for Projects in a Coastal Zone

The EIS must include a fully completed NYC Waterfront Revitalization Program Consistency Assessment Form (WRP CAF) and supporting data including but not limited to disclosure of federal funds used (including Section 8 payments, or financing securitized by Section 8 or other Federal payments or subsidies for housing); affects on water quality designations due to combined sewer overflows in the Newtown Creek drainage basins; direct and indirect discharges, including toxins, hazardous substances, and other pollutants, effluent, and waste in the East River, the Newtown Creek, New York Harbor, and all water affected by sewage collection, treatment, or failure thereof.

The WRP CAF can not and should not be limited to flood hazard and sea level rising mentioned as the text of the bullet point on Page 20 of the DSOW appears to suggest.

The significant problems and effects of constructing in this coastal floodplain evidenced by the Extell Tower construction must inform the WCF CAF. Foundation issues, cracking and water intrusion to nearby buildings, interference with existing infrastructure (e.g. steam pipes) all support evaluation of the efficacy of constructing in this area of Manhattan Island.

For these and other reasons, the Federal Emergency Management Agency and the NYS Department of State are Involved Parties in the Two Bridges Megatower Project EIS and must participate in its preparation.

4. **Socioeconomic Conditions**

The Draft SOW states, “The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area.”

However, because this proposed construction affects a Large Scale Residential Development Zoning Area, the assessment is not limited to the categories outlined in the CEQR Technical manual, but must also evaluate outcomes and long term effects under the standards set forth in Section 78-01 of the *Zoning Resolution of the City of New York* which states:

For large-scale residential developments involving several zoning lots but planned as a unit, the district regulations may impose unnecessary rigidities and thereby prevent achievement of the best possible site plan within the overall density and bulk controls. For such developments, the regulations of this Chapter are designed to allow greater flexibility for the purpose of securing better site planning for development of vacant land and to provide incentives toward that end while safeguarding the present or future use and development of surround-

ing areas and, specifically, to achieve more efficient use of increasingly scarce land within the framework of the overall bulk controls, to enable open space in large-scale residential developments to be arranged in such a way as best to serve active and passive recreation needs of the residents, to protect and preserve scenic assets and natural features such as trees, streams and topographic features, to foster a more stable community by providing for a population of balanced family sizes, to encourage harmonious designs incorporating a variety of building types and variations in the siting of buildings, and thus to promote and protect public health, safety and general welfare.

The Scope of Work must also include all aspects of the socio-economic conditions studied, investigated and used to make the ZR Section 313 Findings prior to issuance of the Special Permit.

5. Shadows

The proposed action to construction of three new megatowers will create shadows with significant detrimental impact on the surrounding areas. The required shadows assessment must address two key adverse impact issues resulting from the proposed action:

- i. **Public Housing residences are sunlight-sensitive resources:** Since Jacob Riis first published *How the Other Half Lives*, public and affordable housing investment in New York City has sought to overcome the darkness and despair of early tenement housing. For over a century after its publication, New York's zoning laws were repeatedly updated to assure all apartment rooms had light. Public housing projects were built in what is known as the tower-in-the-park style – an adaptation of contemporary housing complexes pioneered by Le Corbusier – to provide L-shaped apartment design that came together tetris-style in green, open space to ensure every unit had light shining in the apartment throughout the day. These historic zoning and public investment in housing remain sunlight-sensitive assets, and must be evaluated as such in the Two Bridges shadows assessment.
- ii. **Compliance with Section 78-313 Findings:** The shadows assessment must be consistent with the Findings under Section 78-313 of the *Zoning Resolution of the City of New York*, and found in compliance with all applicable subsections, including (b), (c), (d), and (g).

6. Wastewater Treatment/Drainage Basin/Clean Water Act Compliance

The Draft SOW states, "According to the CEQR Technical Manual, a water and sewer infrastructure assessment analyzes whether a proposed project may adversely affect New York City's water distribution or sewer system and, if so, assess the effects of such projects to determine whether their impact is significant, and present potential mitigation strategies and alternatives" (emphasis added).

- i. The Water Distribution and Sewer System affected by the Megatower Group encompasses infrastructure, pumping, flow, flow control, treatment, and discharge capacities of the Newtown Creek Drainage basin extending throughout Lower Manhattan to 14th Street on the West Side and 71st Street on the East Side

When it rains in New York City, raw sewage bypasses treatment plants and flows directly into city waterways. Even a relatively small amount of storm water – one twentieth of an inch of

rainfall – can overwhelm aging and clogged system components and trigger the Combined Sewer Overflow (CSO) system. The New York State Department of Environmental Conservation (DEC) has identified Combined Sewer Overflows (CSOs) as the single largest source of pathogens to the New York Harbor system, due to their contribution of fecal coliform. Besides the human waste, any oil, industrial waste or household garbage that happens to be on the street when a rainstorm begins are swept by the flowing street water into the CSO system as well. The toxic soup flows untreated out of pipes that feed directly into the waterways.

The New York State Department of Environmental Conservation administers the State Pollutant Discharge Elimination System ("SPDES") permit program (ECL §17-0801, et seq.) to which New York City is jurisdictionally subject. New York City operates under multiple SPDES permits for its wastewater treatment plants, and for its Municipal Separate Storm Sewer Systems (MS4). In general, the SPDES program prohibits any discharge of pollutants to the waters of the State without a permit establishing pollutant limitations and treatment requirements. Thus, SPDES permits set certain effluent limitation parameters, determined according to ECL § 17-0809 and 6 NYCRR Part 750-1.11, in order to avoid contravention of mandated federal water pollution control requirements and water quality standards ("WQS"). Those conditions address not only the allowable parameters for discharge of pollutants to waters of the State, but also the manner in which the permittee is to **operate, maintain, monitor and report** on its regulated facilities and activities.

The proposed Megatower Group project will be located in the drainage area that feeds to the Newtown Creek Waste Water Treatment Plant (NCWWTP) (see map above). Combined sewage and rainwater from the Lower East Side, along with areas such as the Financial District, Tribeca,

Greenwich Village, Chinatown, Midtown East and the East Side up to 71st Street, flow through 180 miles (290 km) of sewer and interceptor pipes to the Thirteenth Street Pumping Station at 13th Street and Avenue D, from where it is sent under the East River to the NCWWTP. Normal influx is 170 million gallons per day (mgd), which increases to 300 mgd during wet weather.

The plant opened in 1967 and its expansion and modernization was completed in February 2009, but in spite of a 50% increase in capacity and extended secondary treatment to all of its inflow, NCWWTP remains out of compliance. As of 2014, NYC has failed to meet 1972 federal Clean Water Act for mandates for secondary treatment removal of 85% of pollutants from incoming sewage, or with New York State's 1992 order to NYC to prevent non-compliance overflows by 2013. A series of enforcement actions has generated multiple Notices of Violation and



Orders on Consent designed to bring New York City into compliance with the Clean Water Act without success.

Major zoning changes and large scale development continues unabated throughout the NCWWTP basin. The addition of a Megatower Group in an already dense area with a high volume of restaurants, hotels, education and healthcare facilities, as well as residences affects the capacity and flow control of the entire NCWWTP drainage system and adds to the likelihood of continued CSOs. The Two Bridges Megatower Project EIS must assess the full impacts to pipe and plant loading, as well as the adverse impacts from ongoing CSO overflow to the East River and other public waters.

- ii. The Scope of Work must analyze the additive impacts of the Megatower Group for possible compliance interference with Administrative and Consent Orders to the City of New York as well as continued listing of the Newtown Creek as an Impaired Water under the Federal Clean Water Act and current NYC SPDES permits

Currently, the New York City Department of Environmental Protection (DEP) is under a 2005 Order on Consent from the DEC pursuant to its SPDES permit to reduce CSOs from its sewer system to improve the water quality of its surrounding waters. In 2011, DEC and DEP identified numerous modifications to the CSO Consent Order, including integration of green infrastructure and substitution of more cost-effective grey infrastructure, and agreed to fixed dates for submittal of the Long-Term Control Plans (LTCP). The 2005 Order was updated and modified in 2012 with a penalty and new compliance requirements, to include an LTCP for NCWWTP.

As part of Clean Water Act requirements for periodic assessments of water quality, Section 303(d) of the Act requires states to identify "Impaired Waters" where specific designated uses are not fully supported, and for which the state must consider the development of a Total Maximum Daily Load (TMDL) or other strategy to reduce the input of the specific pollutant(s) that restrict waterbody uses in order to restore and protect such uses. In October of 2016, the DEC submitted to USEPA the Proposed Final New York State 2016 Section 303(d) List of Impaired/TMDL Waters. The list identifies those waters that do not support appropriate uses and that require development of a Total Maximum Daily Load (TMDL) or other restoration strategy.

Newtown Creek is included on the 2016 Section 303(d) List of Impaired waters by DEC. Newtown Creek was among several waterbodies approved for delisting in 2012 by USEPA because required control measures other than a TMDL were expected to result in attainment of water quality standards within a reasonable period of time. In approving the delisting, USEPA had determined that the updated 2005 Order was consistent with the National CSO Control Policy and that "pursuant to this policy the Long Term Control Plans (LTCPs), when implemented, are expected to result in the attainment of water quality standards."

However, the required controls as outlined in detail in the modified 2005 NYC CSO Consent Order have not been fully implemented. Therefore, rather than delist Newtown Creek in 2016, DEC opted to retain these waters on Part 3c of the listing as waterbodies for which TMDLs are deferred pending the submittal and approval of the waterbody-specific Long Term Control Plans (LTCPs) to address these pollutants. Upon DEC approval of LTCPs that meet the requirements of the Order, the waterbodies covered by the LTCP will be delisted and assigned to

a different followup category. The Newtown Creek LTCP was originally slated for completion by June of 2017.

On August 31, 2016, USEPA issued an Administrative Order to New York City requiring it to develop a plan to address continued sewer backups into residents' basements and other public and private property. The order gave the city 120 days to submit a plan to EPA for approval to work toward the elimination of unauthorized wastewater releases from sewer backups citywide over the next seven years.

This order notes that New York City has made progress in responding to complaints in recent years, but it does not have a *comprehensive plan* to prevent and further reduce the number of sewer backups. The order is designed to ensure that the city prevents sewer backups through a systematic and proactive program, as other large cities have. USEPA specifically noted that raw sewage in people's homes and in buildings where they work creates health risks, which can be avoided by a proactive strategy to cut sewage backups. The Plan would have been due by the end of 2016.

iii. Summary of Required Water/Sewer Analysis Scope for Two Bridges Megatower Group Analysis

Contrary to NYS laws and regulations, CEQR, and other legal requirements, the Draft SOW attempts to limit areas of assessment solely to drainage on the site where the megatowers will be constructed. In light of the facts and legal issues outlined above, particularly the ongoing violations of the Clean Water Act by the New York City sewage system, the Two Bridges Megatower Project EIS must assess the additive load from three megatowers to the entirety of the system affected, including:

- (a) The capacity of piping systems to transmit combined sewage and rainwater to the Newtown Creek Wastewater Treatment Plant (NCWWTP) without violation of law or permit requirements
- (b) Interference with flow control, sewer backup mitigation, access, and fair usage by other neighborhoods already reliant on the piping, overflow, basin, and pumping capacity of the Newtown Creek drainage area, including Chinatown, the Financial District, East Midtown, the Upper East Side, Financial District, Chelsea, Tribeca, and all other areas of eastern, lower, and lower western Manhattan in the NCWWTP drainage area
- (c) The capacity of the affected waters (East River, New York Harbor, Hudson River, Newtown Creek) to accept combined sewer outfalls from locations throughout the NCWWTP drainage area in light of current capacity overload in the NCWWTP system
- (d) The capacity of the NCWWTP itself to accept and process the combined sewer overflow from the drainage area
- (e) The high volume of combined sewer overflows already occurring in the NCWWTP drainage area
- (f) The massive additive load to the sewage system under construction, permitted, or planned (including major zoning expansions under consideration in the NCWWTP Drainage Area such as Midtown East) including but not limited to additive development in Chinatown, the

Financial District, East Midtown, the Upper East Side, Financial District, Chelsea, Tribeca, and all other areas of eastern, lower, and lower western Manhattan in the NCWWTP drainage area,

- (g) The effects with and without capital and operational elements of the Long Term Control Plan for the NCWWTP required by statute and consent order
- (h) The volume of sewer backup complaints and notices of violation in the NCWWTP drainage area
- (i) The high concentration of existing restaurants, hotels, medical facilities, retail food establishments, colleges and universities, schools, senior centers, food trucks, and other commercial and residential users of the sewer system components throughout the NCWWTP drainage area
- (j) Compliance with requirements of the Comprehensive Plan compelled by USEPA Administrative Order dated August 31, 2016 (Docket Number: CW A-02-2016-3012, which includes Newtown Creek WWTP Permit No. NY0026204)
- (k) Compliance with 2012 Consent Order as modified, including implementation of Long Term Control Plans
- (l) Compliance with standards required for de-listing of the NewTown Creek as an "Impaired Water" under section 303 of the Clean Water Act
- (m) Issuance of Section 78-313 Findings: The wastewater system assessment must be evaluated under Section 78-313 of the *Zoning Resolution of the City of New York*, and found in compliance with all applicable subsections, especially whether capacity and flow control increases in the Two Bridges LSRD from the proposed project will affect the City as a whole

Systemwide assessment is necessary because this EIS must evaluate combined sewage overflow and capacity not just for "impacts" but for substantive legal and financial requirements and implications.

- iv. The DSOW should evaluate whether a "Hookup Moratorium" is appropriate for the area pending completion of the Long Term Control Plan for the NCWWTP, and full compliance with the Consent and Administrative Orders noted above

The Two Bridges megatower Group is likely to have not only multiple adverse environmental effects, but affect investment decision-making for limited New York City funds available to meet Clean Water Act requirements made necessary by today's overloads. Ongoing violations of the Clean Water Act such as those occurring now have resulted in serious consideration of a "hookup moratorium" in the past, a situation that may be again applicable given the overwhelming volumes of development added to the NCWWTP Drainage Area as well as the millions of additional square feet currently under construction, permitted, or planned in an area draining to an impaired water.

In light of the foregoing, the US Environmental Protection Agency (Region II), NYS Department of Environmental Conservation, and the NYC Department of Environmental Protection must be considered Involved Parties in the Two Bridges Megatower Group EIS, and included in its preparation.

7. Solid Waste

- i. The evaluation of solid waste must assess additive collection trips, including truck emissions and traffic congestion from pickup to final disposition of the discarded material, including impacts at the ultimate disposal site and transport corridors.
- ii. **Compliance with Section 78-313 Findings:** The solid waste assessment must be consistent with Findings under Section 78-313 of the *Zoning Resolution of the City of New York*, and found in compliance with all applicable subsections, including (b), (c), (d), and (g).

8. Energy

- i. The scope of the energy consumption analysis of the Two Bridges Megatower Group must include liquid fuel, natural gas, and electricity consumption, and should be integrated with the Air Quality analysis, especially as the energy production on- and offsite will create emissions directly attributable to consumption, operations, and maintenance of the Megatower Group. The scope of energy analysis should include, but is not limited to the following factors:
 - (a) The capacity of delivery systems to provide sufficient fuel and electric energy based on transmission and capacity planning for New York City, especially in light of planned closure of the Indian Point Nuclear Power Plant as a source of electric generation for operation and maintenance of the Megatower Group
 - (b) Interference with substation capacity, demand management, or other energy efficiency programs mandated by City, State and federal law, as well as total energy consumption reduction programs advocated by all agencies and divisions of the government of the City of New York
 - (c) Current and future capital spending requirements for generation, transmission, distribution, and demand management system requirements for electricity service to sustain electric load requirement of the service area in which the Two Bridges Megatower Group will be operated and maintained that will be passed through to ratepayers in the same system
 - (d) Supply and delivery system capacity for natural gas consumption requirements of the Two Bridges Megatower Group, including transmission, distribution and delivery capacity in the service system area
 - (e) Construction and placement capacity for the physical energy delivery components required, including pipes, wires, and other energy delivery infrastructure, with particular emphasis on availability subsurface, surface, and elevated capacity for safe emplacement of physical components,
- ii. **Compliance with Section 78-313 Findings:** The energy effects assessment must be consistent with Findings under Section 78-313 of the *Zoning Resolution of the City of New York*, and found in compliance with all applicable subsections, including (b), (c), (d), and (g). In particular, the Findings should be based on sufficient information and analysis showing that the construction and operation of the buildings themselves, as well as energy, waste han-

ding, and other operations and maintenance activities will not materially interfere with the energy infrastructure operating for the benefit of other buildings and residents in the LSRD.

9. Transportation

The DSOW claims that C6-4 zoning is “typically” mapped in areas in districts “well served” by transportation, the lead agency must demonstrate that current conditions continue to meet the “well served” standard. By most measures, the public transportation systems have developed into total inadequacy in light of the major increase in ridership, overcrowding, and deterioration of capital and maintenance. The ability to meet the flow and service conditions “presumed” by C6-4 zoning has a direct bearing on the granting of this Special Permit as a major modification, since resident and trip loads that exceed the C6-4 zoning parameters could be construed as a functional variance of the current zoning in addition to a major modification of a Special Permit. Air Quality MOVES data insufficient under 78-311 and 312

10. Involved Parties

The scope, scale, and environmental impacts presented by the addition of 4,775 new residences into a few square blocks coupled with the significant number of oversized, dense, and use intense infrastructure components cumulatively planned for the Newtown Creek Drainage area and Lower Manhattan in general, the following agencies must be involved in the DCP evaluation of the impacts of this and related projects:

1. Department of Housing and Urban Development (HUD): The full extent to which Federal funds will be used for capital, debt services, or lending leverage must be described in the DSOW, and HUD included as an involved agency in the event such monies are key to construction and operation. In the alternative, the DSOW must describe how the EIS will conform to any applicable HUD regulations under 24 CFR Part 58.
2. USEPA: The USEPA is an involved party due to significant legal compliance requirements affected by the project under two major statutes:
 - i. The Clean Water Act: USEPA Administrative Compliance Order No. CWA-02-2016-3012 for State Pollution Discharge Elimination System permit violations including NY0026204 pertaining to the Newtown Creek Wastewater Treatment Plant
 - ii. Comprehensive Environmental Response, Liability and Compensation Act (CERCLA, also known as “Superfund”) – Newtown Creek, the single location of wastewater treatment for the project and dozens of other large-scale developments adding to the will occur, is the site of a major Superfund Cleanup. A draft report of the investigative phase was submitted to EPA for review on November 15, 2016 pursuant to a Consent Order for the site. Given the sensitivity of the area to additive contaminants and the overarching need to comply with the federal cleanup requirements, USEPA expertise and oversight is required for the Two Bridges EIS.
3. NYSDEC: The State DEC has filed an Order on Consent (CSO Order Modification to C02-20000107-8; DEC Case No. C02-20110512-25) for violations of Article 17 of the Environmental Conservation Law and Part 750, et seq., of Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York. This Order includes completion of a Long Term Control Plan (LTCP) for the Newtown Creek, whose plant will be fed by the cumulative devel-

opment of the proposed action and multiple other oversized infrastructure projects that will cumulatively affect the NCWWTP.

4. NYCDEP: The DEP is legally responsible for New York City compliance with various sewage compliance orders affected by the proposed construction and operation of the Megatower Group.
5. FEMA: The Two Bridges LSRD is located in a mapped floodplain; introduction of over 5,000 new residences (including the current Extell Tower construction) requires involvement of the federal agency charged with assuring compliance with floodplain construction. FEMA involvement is particularly important given evidence of construction issues arising from the Extell Tower construction, including damage to infrastructure, water intrusion, and other built and natural infrastructure problems arising from attempting massive megatower builds in a floodplain.

IV. Project Alternatives

An EIS must contain an evaluation of “alternatives to the proposed action,” ECL §8-0109(2). The analysis of alternatives has been called the “driving spirit” of the SEQRA process. The SEQRA regulations require that a Draft EIS must include an alternatives analysis comparing the proposed action to a “range of reasonable alternatives...that are feasible, considering the objectives and capabilities of the project sponsor.” (§ 617.9(b)(5)(v)). The current scope fails to meet this legal requirement, and therefore reasonable alternative must be included.

The DSOW should include alternative development options consistent with zoning, density, and neighborhood recognition provisions laid out in the Chinatown Working Group rezoning plan.

The Chinatown Working Group plan has widespread support throughout the community, and includes specific provisions for the Two Bridges area (subdistrict D):

- A height limit of 350'
- Anti-harassment and anti-demolition certification
- C6-4 lots rezoned to C6-4 modified
- M1-4 and C2-8 walkway be mapped as Parkland
- All M1-6 lots be maintained as M1-6
- A guarantee of at least 50% affordable housing in new development at local AMI
- Large-scale development mapped as a Special Planned Community Preservation District
- A special permit requiring that any new residential development on public housing land be 100% low-income and a full ULURP review
- Climate Change/Resilience architecture, landscape, and open space features to accommodate sea level rise and water detention, including green infrastructure and retention tanks

Alternatives should also include DCP developed options for compatible uses of the target open space that is in keeping with required benefit to the residents and City as a whole. These can include:

- Development of a much needed electric vehicle charging station on Site 5 for use by the growing fleet of City electric vehicles
- Stand-alone grocery and other food market options that alleviate food desert issues for Two bridges without compromising the current air, light, density, and character features integral to the residential community

V. Cumulative Impacts

The DSOW fails to include legally required cumulative impact analysis. Although “cumulative impacts” are not defined by SEQRA or its implementing regulations, the DEC SEQR Handbook describes the requirements for their analysis (page 41):

These are impacts on the environment that result from the incremental or increased impact of an action(s) when the impacts of that action are added to other past, present and reasonably foreseeable future actions. Cumulative impacts can result from a single action or a number of individually minor but collectively significant actions taking place over a period of time. Either the impacts or the actions themselves must be related.

Cumulative impacts must be assessed when actions are proposed to or will foreseeably take place simultaneously or sequentially in a way that their combined impacts may be significant. Assessment of cumulative impacts is limited to consideration of probable impacts, not speculative ones.

In the case of the Two Bridges Megatower Group, all the EIS impact categories are affected by accumulated effects of multiple large-scale developments in the immediate neighborhood for the past several years, and expected into the future, e.g., Extell Tower, Essex Crossing, South Street Seaport residential and commercial, multiple hotels, and expanded museums, to name only a few examples. The accumulated load and impact to airshed, sewage, drinking water distribution, transportation, school, energy production and distribution, steam, open space and other assessment categories from this Megatower Group must be evaluated for its addition to the load burdens presented by the significant infrastructure, population, mobility, services, and other capacity burdens accumulating throughout the Lower Manhattan ecosystem.

Thank you for the opportunity to submit these comments and participate in the EIS process.

Very truly yours,



for

Lower East Side Organized Neighbors

Tany Castro-Negron, LE2RA
 David Nieves, Seward Park Ext. & member of NMASS
 Tony Queylin, Two Bridges Tower & member of NMASS
 Irene HongPing Shen, CSWA
 David Tieu, CSWA

CC: Nydia Velasquez, U.S. Congressman, 10th District of New York (by Email)
Gail Brewer, Manhattan Borough President (by Email)
Margaret Chin, City Council District 1 (by Email)
Daniel Squadron, New York State Senate (by Email)
Yuh-Line Niou, New York State Assembly (by Email)
Catherine R. McCabe, Acting Regional Administrator, US EPA Region 2
Basil Segos, Commissioner, New York State Department of Environmental Conservation
Robert J. Fenton, Jr., Administrator, Federal Emergency Management Agency
Mirza Orioles, Deputy Regional Administrator, US Dept. of Housing and Urban Development
Vincent Sapienza, Commissioner, New York City Department of Environmental Protection

L E S O N
L O W E R E A S T S I D E
O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

May 25, 2017

Re: Draft Scope of Work Comments

“Two Bridges large Scale Residential Development Area Project”

CEQR No. 17DCP148M

Pursuant to Section 5-07 of the Rules of Procedure for Environmental Review (CEQR) and 6 NYCRR 617.8 (State Environmental Quality Review), the New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC) as CEQR lead agency, has determined that a Draft Environmental Impact Statement (DEIS) is to be prepared for the proposed actions related to the development of the “Two Bridges Large Scale Residential Development Area Project” (CEQR No. 17DCP148M).

The three project applicants – Cherry Street Owner, LLC (an affiliate of JDS Development Group, and Two Bridges Senior Apartments LP); Two Bridges Associates, LP (a joint venture between CIM Group and L+M Development Partners); and LE1 Sub LLC – each seek modifications characterized as minor to the existing Two Bridges Large Scale Residential Development (LSRD) to allow for the development of three massive mixed-use buildings within the LSRD. The

As the CEQR lead agency, the Department of City Planning has requested the applicant[s] prepare or have prepared, at their option, a Draft Environmental Impact Statement (DEIS) in accordance with 6 NYCRR 617.9(b) and Sections 6-08 and 6-12 of Executive Order No. 91 of 1977 as amended (City Environmental Quality Review). A public scoping meeting has been scheduled for May 25, 2017, where the public and interested parties can provide input and comments.

The *Lower East Side Organizing Neighbors* (LESON) is a group of local leaders organizing and inspiring the residents of the Lower East Side and its surrounding areas at large to challenge the many issues directly and adversely impacting the current and future preservation of their homes, businesses, community organizations, clinics, senior centers, schools published services and overall quality of life.

LESON considers the Draft Scope of Work (DSOW) to be deficient in several key areas, and provides the following comments regarding necessary changes to and expansion of the DSOW necessary to conduct a fully compliant environmental impact statement prior to any issuance of the Two Bridges LSRD permits and authorizations under the Zoning Resolution, and construction of the Megatower Group can be otherwise permitted and undertaken.

Comments on Scope and Preparation of the

Two Bridges Environmental Impact Statement (CEQR No. 17DCP148M, “Two Bridges EIS”)

Pursuant to Sections 5.03 and 5.05 of the City Environmental Quality Review Rules of Procedure, the Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), is assuming Lead Agency status for an application submitted by three developers to construct three luxury megatower residences inside the boundaries of the Two Bridges Large Scale Residential Development (Two Bridges LSRD) established in 1972 (CP-21885). This “Megatower Group” will add approximately 3,469 new dwelling units to a roughly nine acre LSRD currently sustaining approximately 1300 residences.

In addition to comments on the scope and sufficiency of the EIS, these comments will also highlight DCP’s failure to date to clearly identify for the affected public all authorizations or special permits to be issued under Zoning Resolution Article VII, Chapter 8 needed to construct the planned megatowers in the Two Bridges LSRD, and reconcile those procedures to the data, information, and evidence developed for the Environmental Impact Statement. Public disclosures and explanations of New York City Zoning Resolution (ZR) requirements for the proposed projects have been fraught with discrepancies, inadequate public records release, and potentially misleading characterizations of zoning law governance and procedures.

Due process under the ZR, in particular the issuance of affirmative “Findings” (ZR 78-313), are conditions precedent to any authorizations and/or special permits, or modifications to existing permits, open space, and other features of the LSRD inherent to its success as a residential community. The ZR requirements are separate from the requirements to perform a legally sufficient EIS, but are interactive with the EIS process in that various environmental impacts identified in the EIS are substantive considerations for issuing the necessary Findings. This is particularly important in areas of socio-economic impact, air, light, shadows, and open space sustainment. In addition to submitting these comments, LESON will provide comments to DCP and all interested parties regarding proper procedures under the ZR for development in an LSRD.

I. Zoning Resolution Issues

The Notice of Lead Agency Determination and Review, dated March 27, 2017 (the “Notice”) clearly states that the mapped zoning for the Two Bridges project area “is modified by the Two Bridges LSRD Plan...” and that “[l]arge scale plans are governed by the provisions of NYC Zoning Resolution Article VII: Chapter 8 (Special Regulations Applying to Large Scale Residential Developments).” The DCP Notice claims that “substantial updates or changes to a Large Scale Plan must be approved by the CPC through a minor or major modification process, depending on whether the changes require waivers or zoning actions not encompassed by previous approvals.”

Various “Special Permits” under the applicable ZR Chapter have been previously issued to establish or change boundaries and other zoning features for “sites” within the LSRD. The CPC and DCP are asserting that such LSRD special permit actions – along with zoning “authorizations” enabled by the applicable ZR chapter – remain in effect, and the changes contemplated to allow a 400% increase in the density of the LSRD are “minor” modifications.

Issuance of special permits under the ZR is subject to Uniform Land Use Review Procedures (ULURP); authorizations are not. Zoning Resolution Chapter 8 further requires the issuance of affirmative “Find-

ings” as a condition precedent to the granting of any such modification in the form of “authorization” or “special permit.”

The DCP Notice and DSOW both fail to describe in sufficient detail the exact nature of the authorizations or special permits required or actually sought for the Megatower Group. In addition, based on procedures for the Two Bridges LSRD Plan and permits first issued by the City Planning Commission in CP-21885, further authorizations and special permits are only granted after public hearing, investigation, and study that provide adequate legal basis to determine that such authorizations and special permits “conform with the findings required under Section 78-313 of the Zoning Resolution...,” and a resolution is published by the CPC confirming such findings.

The legal responsibility to follow these procedures are separate from the Environmental Impact Analysis process. The Notice makes further assertions that appear to either confuse, conflate, overlook, or disregard the clear procedures and requirements of the controlling ZR:

- “The Two Bridges LSRD Special Permit was originally approved by the CPC on May 17, 1972 (CP-21885) and was last amended on August 23, 2013 (M120183 ZSM). The 2013 amendment was to allow for the development of a new mixed use building on Site 5, as well as the enlargement of existing retail use and the relocation of 103 existing accessory surface parking spaces into the new building. That proposed development did not occur. The LSRD Special Permit, as amended, remains in effect.”

The ZR section 78-07 (Lapse of Authorization or Special Permit) states that any authorization or special permit granted by the City Planning Commission pursuant to this Chapter shall automatically lapse if substantial construction has not been completed as set forth in Section 11-42 (Lapse of Authorization or Special Permit Granted by the City Planning Commission Pursuant to the 1961 Zoning Resolution). That section indicates substantial construction must occur within four years of permit issuance, absence certain circumstances. The DCP should clarify why it believes the authorizations and/or special permits or special permit modifications issued to the cancelled Healthcare Chaplaincy Project regarding Site 5 in the LSRD remains in effect, and have not lapsed consistent with the ZR.

- “The proposed projects do not require waivers or zoning actions not encompassed by previous approvals and each will proceed as a minor modification to the previously approved Two Bridges LSRD.”

The Megatower Group will add almost 5,000 new residences to an area currently occupied by about 1300 dwellings over an above the hundreds of apartments added by the Extell Tower. The DCP has accurately stated that the zoning on the sites is modified by the Two Bridges LSRD, establishing a non-controvertible requirement for issuance of necessary authorizations and special permits for any Location of Buildings, Distribution of Bulk and Open Space, Modification of Height and Setbacks, Total Floor Area, Lot Coverage, Dwelling or Rooming Units, Total Open Space required, and re-designation of zoning lots under ZR sections 78-311 and 78-312 that will occur as part of the three Megatower Projects. It is not clear why the DCP is using terms such as “waiver” or “zoning actions” when the controlling provisions of the ZR refer to “authorizations” and “special permits.”

Given the proposed actions will overwhelm the current density, character, open space, air, light, and multiple infrastructure systems of the LSRD, the attempt by DCP to label the proposed action “minor” is disingenuous, at best, and not supported by the sheer magnitude of the residential load under con-

sideration for the LSRD Plan area capacity. For the current Megatower Group DSOW and planned EIS, the applicants and DCP must clarify the following in order to ensure the community and interested parties are fully informed as to the LSRD-governed zoning changes needed for these projects to proceed, and which Zoning Procedures under ZR Article VII, Chapter 8 will be completed:

- Every separate “Authorization” or “Special Permit” that must be issued for each separate tower project, and the data, information, and evidence developed in the EIS that could support affirmative Findings under 78-313
- A full description of the current Location of Buildings, and volumes associated with distribution of Bulk and Open Space, Total Floor Area, Lot Coverage, Dwelling or Rooming Units, as well as Modification of Height and Setbacks, alteration of Total Open Space, Light, Air, Congestion, and all other current site and community planning aspects, features, components, and volumes that will be altered by issuance of any authorization or special permit under ZR 78-311 or 78-312
- Explanation of how the addition of 4,775 residential units to LSRD sites currently governed by special permits, authorizations, open space, and infrastructure systems sustaining 1,300 can be viewed as “minor” modifications to the LSRD

II. Environmental Analysis Requirements

1. Statement of Purpose and Need

The Draft Scope of Work fails to identify a purpose or need for the proposed action consistent with public benefits intended by the creation of an LSRD, or other benefits to the City of New York or its taxpayers. According to the New York State Environmental Quality Review Act (SEQRA), the description of the proposed action should contain “the purpose or objective of the action, including any public need for, or public benefits from the action, including social and economic considers, and identification of authorizations, permits and approvals required.” (6 CRR-NY 617.9(b)(5))

Although the DSOW describes the construction of three luxury megatowers, the DCP/CPC decision to grant authorizations or special permits would irrevocably alter the open space, bulk distribution, floor area, other infrastructure elements, and most importantly, the community character of a longstanding and successful LSRD. Therefore, Section C: Purpose and Need of the Proposed Action or the DSOW must describe the documented purpose and need for the megatowers themselves, and the concomitant issuance of any and all authorizations or special permits under Zoning Resolution Article VII, Chapter 8 for this Megatower Group compliant with the provisions of ZR 78-01: General Purposes.

In addition, given the application of ZR sections 78-311, 312, and 313, the Statement of Purpose and Need should describe goals, outcomes, policies, or plans achieved by constructing this Megatower Group that the applicants and DCP are asserting or will assert as evidence the projects meet the requirements of ZR section 78-313: achieve the General Purposes of the LSRD formation itself; permit better site planning and benefit the LSRD residents and the City as a whole; prevent any bulk, population density, or use intensity detrimental to the nearby occupants; prevent restriction of air or light to nearby buildings or create traffic congestion; maintain the design purposes of pooled areas; assure suitable access to streets; or modify setbacks to impair the essential character of the of the surrounding area or have adverse effects on any neighbor’s access to air, light, and privacy.

2. Conformance with Law

The evaluation of environmental “impacts” includes public identification, disclosure, and analysis of any aspect of the proposed project[s] subject to laws other than SEQRA, especially those that extend beyond the impact category and represent potential for violations of, or compliance interference with, laws, regulations, Orders on Consent, Administrative Orders, or any other enforcement action issued by Federal, State, or municipal authorities covering the operation and management area of the project[s]. In the case of the Two Bridges Megatower Group, these include (but are not limited to) the Clean Water Act, the Clean Air Act, the Comprehensive Environmental Response Compensation and Liability Act, and the Federal Emergency Response Act.

The application of multiple legal requirements has particular bearing on the discretionary decision-making under the requirements of Zoning Resolution (ZR) of the City of New York Article VII, Chapter 8. In this case, the EIS will be required to contain sufficient evidence that the proposed action with confirm to the Findings required for issuance of Special Permit sought by applicants from the lead agency. The application of ZR Article VII, Chapter 8 noted above, and referenced throughout these comments.

III. Proposed Scope of the Environmental Impact Statement/EIS Content

1. Identification of adverse impacts

- ii. Short- and long-term effects, typical associated environmental effects, and adverse environmental impacts that “cannot be avoided” must include any and all resulting from construction, permanent alterations, operation, and maintenance of the proposed project, particularly those that can cause or contribute to compliance interference or violations of law by proponents or any agency of the City of New York.
- iii. Irreversible and irretrievable commitments of resources analyzed must include the construction, operations, and maintenance activities occurring during the useful life of the proposed project, including but is not limited to all affected airshed, airspace, water discharge carrying capacity, drinking water, land, open space, and light as well as City roads, schools, pipes, fuel/energy, and all other physical infrastructure systems, whether used in the immediate geographic area of the project, or used through transport, migration, distribution, or other direct and indirect means as assets and resources that would be involved and committed if the proposed project is built and operated over its useful life.

2. Segmentation

Part 617 of Chapter VI of the Codes, Rules, and regulations of the State of New York defines segmentation as the division of the environmental review of an action so that various activities or stages are addressed as though they were independent, unrelated activities needing individual determinations of significance. Except in special circumstances, considering only a part, or segment, of an overall action is contrary to the intent of SEQRA.

There are two types of situations where segmentation typically occurs. One is where a project sponsor attempts to avoid a thorough environmental review (often an EIS) of a whole action by splitting a project into two or more smaller projects. **The second is where activities that may be occurring at different times or places are excluded from the scope of the environmental review.** By excluding

subsequent phases or associated project components from the environmental review, the project may appear more acceptable to the reviewing agencies and the public. This Scope of Work must be revised to prevent this contravention of State regulation.

The Scope of Work for this EIS must include review of the construction of this Megatower Group, but also the full impact loading from every component of its operation and maintenance, including regular and repeated use of the full compliment of the City's land, air, water, and physical infrastructure *systems* accepting load from this construction, operation, and maintenance through its useful life. For example, the scope must cover use of wastewater treatment plant capacity, discharge carrying capacity of public waters, airshed capacity used for all aspects of transport, deliveries, and waste collection, etc. This full compliment of City system components extends well beyond the immediate blocks in and around the Two Bridges LSRD, and the failure to evaluate and analyze this full spectrum use would constitute improper segmentation.

In addition, segmented or insufficiently scoped analysis could result in insufficient evidence to issue legally supportable Findings under ZR Section 78-313.

3. Land Use, Zoning, and Public Policy

The proposed action under consideration in the Two Bridges EIS is the construction of three megatowers comprised of luxury residences inside the boundaries of the Two Bridges Large Scale Residential Development (Two Bridges LSRD) established in 1972 (CP-21885).

The Full Form EAS completed for this Two Bridges EIS states in Section 5 that this Megatower Group construction project requires a "Special Permit" that is a "minor modification to a previously approved LSRD." Consistent with requirements of Sections 200 and 201 of the City Charter governing the amendment, repeal, or addition to an existing Zoning Resolution by Authorization or Special Permit, the DCP website explains that "a special permit is a discretionary action by the City Planning Commission, subject to ULURP review, or the Board of Standards and Appeals, which may modify use, bulk, or parking regulations **if certain conditions and findings specific in the Zoning Resolution are met.**" (emphasis added)

- i. The LSRD Special Permit requested is a "Major" modification of the current LSRD bulk controls that are designed to optimize active and passive recreation, preserve scenic and natural features, foster a more stable community, ensure harmonious designs, and overall protect heath, safety, and general welfare of all LSRD residents.

It beggars belief that the addition of 4,775 new residences within a few square blocks, consuming vast areas of open space and light penetration for an established working class community, is characterized as "minor." The LSRD Special Permit requested imposes massive redistribution of bulk, height, open space, maximum developable floor area, lot coverage, dwelling units, air, and light in the current LSRD use allocations, and constitute a major change to the LSRD.

In addition to full ULURP review of said major change, DCP must adhere to the procedural requirements of the ZR. Given the overwhelming redistribution of Two Bridges LSRD capacity taken up by the Extell Tower project, the requirement to evaluate according to the preconditions of ZR section 78-313 are even more vital.

The DCP claim that a "Minor Modification" of an existing land use designation (to include an LSRD) "may alter elements of the prior approval, but without increasing the extent of any waiver or

modification of the underlying zoning regulations granted under the prior ULURP approvals, and **without requiring any new waivers or modifications of zoning regulations.**” This has caused no end of serious public misapprehension that the height, bulk, setbacks, dwelling units, population density and other key factors altering asset uses within the LSRD are to not subject to the standards set in ZR 78-313. The proponents and lead agency persist in demarcating this project in terms of whether the underlying surface zoning will be altered, when it well understands it is the LSRD that will developed virtually out of existence.

The lead agency and proponents have muddied the waters with two confusing variations the intricate and complex provisions of the City Charter and Zoning Resolution governing this action. The lack of height restrictions in C6-4 are modified by the ZR, and allowable building heights must be judged against the legal preconditions to preserve active and passive recreation, preserve scenic and natural features, foster a more stable community, ensure harmonious designs, and overall protect health, safety, and general welfare of all LSRD residents, not just those in the penthouses.

To add to the public confusion and obfuscation, the lead agency and proponents appear to be either conjunctively or alternatively claiming in the Notice that the “Special Permit” granted for the Health Care Chaplaincy project (M120183 ZSM) “remains in effect” despite ZR section 78-07 which specifically states that authorizations or special permits automatically lapse in the absence of “substantial construction.” To the extent the City is claiming that the current project qualifies as a minor modification because it represents a minor set of changes from LSRD authorizations and permits approved for the Chaplaincy project, the “minor” characterization is unsupported. Further, as the Chaplaincy Project was never built, the assertion that its special permit remains in effect is also confusing to the public, at best, and risks being overtly misleading. It also has the unfortunately effect of creating the appearance of “bait and switch” – a special permit is granted for a fifteen story project, and switched to apply to a megatower.

- ii. The DCP, MOEC, and all regulatory and approval offices including the Office of the Manhattan Borough President must fully explain that the LSRD Modifications are subject to study, investigation, and hearing procedures for issuing Findings under ZR 78-313, and the Scope of the EIS should include or cross reference all evaluation of the project carried out under ZR sections 78-311, 312, and 313.

As noted above, the Two Bridges LSRD is governed by the provisions of Chapter 8 of Article VII of the *Zoning Resolution of the City of New York (ZR)*, the General Purposes of which are to set forth regulations “designed to deal with certain types of problems which arise only in connection with large-scale residential developments and to promote and facilitate better site planning and community planning through modified application of the district regulations in such developments.” (Section 78-01).

Section 78-043 of the ZR describes the requirements for findings as affirmative standards constituting a burden of proof to be met by the proponents:

The requirements for findings as set forth in this Chapter ***shall constitute a condition precedent to the grant of any such modification by special permit or otherwise.*** The decision or determination of the City Planning Commission shall set forth each required finding in each grant of modifications for a large-scale residential development. ***Each finding shall be supported by substantial evidence or data*** considered by the Commission in reaching its final decision (emphasis added).

Sections 78-311 and 78-312 of the Zoning Resolution provides that the City Planning Commission may authorize modifications to open space, lot size, building location, height and setback, entrances, floor area ratios and other design and construction elements for the purpose of achieving better site planning and community planning, but only if the Commission can make findings in accordance with Section 78-313, which provides conditions precedent whose standards must be met with supportable data for such modifications:

- (a) that such modifications will aid in achieving the general purposes and intent of this Chapter as set forth in Section 78-01 (General Purposes);
- (b) that such distribution of floor area, dwelling units, rooming units, open spaces, locations of buildings, or location of primary business entrances, show windows or signs will permit better site planning and will thus benefit both the residents of the large-scale residential development and the City as a whole;
- (c) that such distribution or location will not unduly increase the bulk of buildings, density of population, or intensity of use in any block, to the detriment of the occupants of buildings in the block or nearby blocks;
- (d) that such distribution or location will not affect adversely any other zoning lots outside the large-scale residential development by restricting access to light and air or by creating traffic congestion;
- (e) where portions of the total required open space are pooled in common open space areas or common parking areas, that such common areas will, by location, size, shape and other physical characteristics, and by their relationship to surrounding development and the circulation system, permit realization of the full community service of advantages for which such pooled areas are designed;
- (f) where one or more zoning lots in the large-scale residential development do not abut mapped streets, that suitable private access to mapped streets will be provided conforming to standards which will ensure adequate circulation and make adequate provision for public services; and
- (g) the modification of height and setback will not impair the essential character of the surrounding area and will not have adverse effects upon the access to light, air and privacy of adjacent properties.

It is worth noting that the standards for these Findings correlate to many confirmed adverse impacts anticipated by the EIS. However, unlike environmental assessments that may only trigger so-called "mitigation," the consequences of construction, operation, and maintenance of this Megatower Group have a high probability of negatively implicating the purpose and intent of the LSRD formation, failing to benefit the nearby residents or City as a whole, increasing bulk and density to the detriment of occupants of nearby blocks, restricting access to air and light, and causing congestion, impeding realization of the full community service of advantages for which such pooled areas are designed, impairing the essential character of the surrounding area, and having adverse effects upon the access to light, air and privacy of adjacent properties, thus disqualifying the project from obtaining a Special Permit.

It bears repeating that the specific requirements of the ZR 78-311 and 312 procedures related to the issuance of “Findings” under section 78-313 has been obfuscated – at best – by both the Lead Agency and the applicant in the Draft Scope of Work, the EAS, and all other documents and assessments prepared for these projects. The Final Scope of Work should be updated to make clear that the ZR affirmative standards are applicable and must be met.

iii. Consistency Assessment for Projects in a Coastal Zone

The EIS must include a fully completed NYC Waterfront Revitalization Program Consistency Assessment Form (WRP CAF) and supporting data including but not limited to disclosure of federal funds used (including Section 8 payments, or financing securitized by Section 8 or other Federal payments or subsidies for housing); affects on water quality designations due to combined sewer overflows in the Newtown Creek drainage basins; direct and indirect discharges, including toxins, hazardous substances, and other pollutants, effluent, and waste in the East River, the Newtown Creek, New York Harbor, and all water affected by sewage collection, treatment, or failure thereof.

The WRP CAF can not and should not be limited to flood hazard and sea level rising mentioned as the text of the bullet point on Page 20 of the DSOW appears to suggest.

The significant problems and effects of constructing in this coastal floodplain evidenced by the Extell Tower construction must inform the WCF CAF. Foundation issues, cracking and water intrusion to nearby buildings, interference with existing infrastructure (e.g. steam pipes) all support evaluation of the efficacy of constructing in this area of Manhattan Island.

For these and other reasons, the Federal Emergency Management Agency and the NYS Department of State are Involved Parties in the Two Bridges Megatower Project EIS and must participate in its preparation.

4. Socioeconomic Conditions

The Draft SOW states, “The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area.”

However, because this proposed construction affects a Large Scale Residential Development Zoning Area, the assessment is not limited to the categories outlined in the CEQR Technical manual, but must also evaluate outcomes and long term effects under the standards set forth in Section 78-01 of the *Zoning Resolution of the City of New York* which states:

For large-scale residential developments involving several zoning lots but planned as a unit, the district regulations may impose unnecessary rigidities and thereby prevent achievement of the best possible site plan within the overall density and bulk controls. For such developments, the regulations of this Chapter are designed to allow greater flexibility for the purpose of securing better site planning for development of vacant land and to provide incentives toward that end while safeguarding the present or future use and development of surround-

ing areas and, specifically, to achieve more efficient use of increasingly scarce land within the framework of the overall bulk controls, to enable open space in large-scale residential developments to be arranged in such a way as best to serve active and passive recreation needs of the residents, to protect and preserve scenic assets and natural features such as trees, streams and topographic features, to foster a more stable community by providing for a population of balanced family sizes, to encourage harmonious designs incorporating a variety of building types and variations in the siting of buildings, and thus to promote and protect public health, safety and general welfare.

The Scope of Work must also include all aspects of the socio-economic conditions studied, investigated and used to make the ZR Section 313 Findings prior to issuance of the Special Permit.

5. Shadows

The proposed action to construction of three new megatowers will create shadows with significant detrimental impact on the surrounding areas. The required shadows assessment must address two key adverse impact issues resulting from the proposed action:

- i. **Public Housing residences are sunlight-sensitive resources:** Since Jacob Riis first published *How the Other Half Lives*, public and affordable housing investment in New York City has sought to overcome the darkness and despair of early tenement housing. For over a century after its publication, New York’s zoning laws were repeatedly updated to assure all apartment rooms had light. Public housing projects were built in what is known as the tower-in-the-park style – an adaptation of contemporary housing complexes pioneered by Le Corbusier – to provide L-shaped apartment design that came together tetris-style in green, open space to ensure every unit had light shining in the apartment throughout the day. These historic zoning and public investment in housing remain sunlight-sensitive assets, and must be evaluated as such in the Two Bridges shadows assessment.
- ii. **Compliance with Section 78-313 Findings:** The shadows assessment must be consistent with the Findings under Section 78-313 of the *Zoning Resolution of the City of New York*, and found in compliance with all applicable subsections, including (b), (c), (d), and (g).

6. Wastewater Treatment/Drainage Basin/Clean Water Act Compliance

The Draft SOW states, “According to the CEQR Technical Manual, a water and sewer infrastructure assessment analyzes whether a proposed project **may adversely affect New York City’s water distribution or sewer system** and, if so, assess the effects of such projects to determine whether their impact is significant, and present potential mitigation strategies and alternatives” (emphasis added).

- i. The Water Distribution and Sewer System affected by the Megatower Group encompasses infrastructure, pumping, flow, flow control, treatment, and discharge capacities of the Newtown Creek Drainage basin extending throughout Lower Manhattan to 14th Street on the West Side and 71st Street on the East Side

When it rains in New York City, raw sewage bypasses treatment plants and flows directly into city waterways. Even a relatively small amount of storm water – one twentieth of an inch of

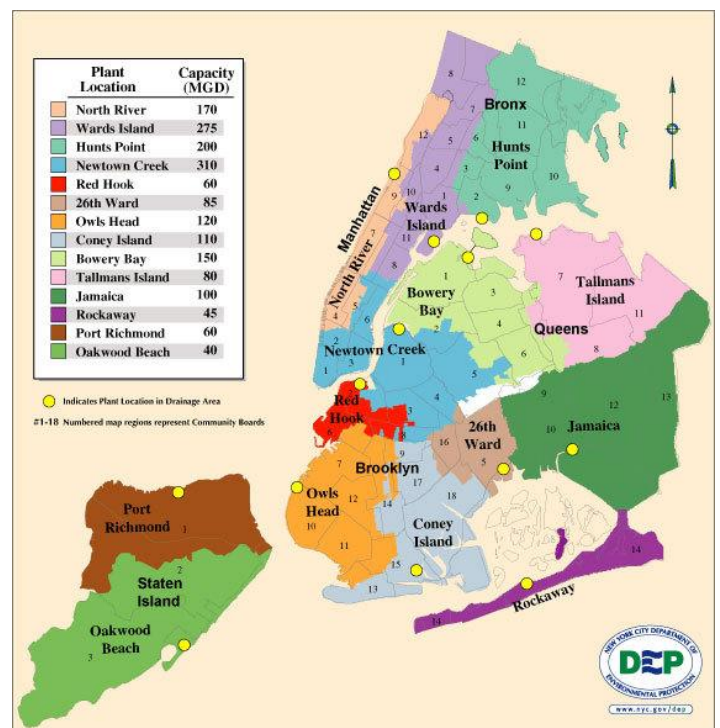
rainfall – can overwhelm aging and clogged system components and trigger the Combined Sewer Overflow (CSO) system. The New York State Department of Environmental Conservation (DEC) has identified Combined Sewer Overflows (CSOs) as the single largest source of pathogens to the New York Harbor system, due to their contribution of fecal coliform. Besides the human waste, any oil, industrial waste or household garbage that happens to be on the street when a rainstorm begins are swept by the flowing street water into the CSO system as well. The toxic soup flows untreated out of pipes that feed directly into the waterways.

The New York State Department of Environmental Conservation administers the State Pollutant Discharge Elimination System ("SPDES") permit program (ECL §17-0801, et seq.) to which New York City is jurisdictionally subject. New York City operates under multiple SPDES permits for its wastewater treatment plants, and for its Municipal Separate Storm Sewer Systems (MS4). In general, the SPDES program prohibits any discharge of pollutants to the waters of the State without a permit establishing pollutant limitations and treatment requirements. Thus, SPDES permits set certain effluent limitation parameters, determined according to ECL § 17-0809 and 6 NYCRR Part 750-1.11, in order to avoid contravention of mandated federal water pollution control requirements and water quality standards ("WQS"). Those conditions address not only the allowable parameters for discharge of pollutants to waters of the State, but also the manner in which the permittee is to **operate, maintain, monitor and report** on its regulated facilities and activities.

The proposed Megatower Group project will be located in the drainage area that feeds to the Newtown Creek Waste Water Treatment Plant (NCWWTP) (see map above). Combined sewage and rainwater from the Lower East Side, along with areas such as the Financial District, Tribeca,

Greenwich Village, Chinatown, Midtown East and the East Side up to 71st Street, flow through 180 miles (290 km) of sewer and interceptor pipes to the Thirteenth Street Pumping Station at 13th Street and Avenue D, from where it is sent under the East River to the NCWWTP. Normal influx is 170 million gallons per day (mgd), which increases to 300 mgd during wet weather.

The plant opened in 1967 and its expansion and modernization was completed in February 2009, but in spite of a 50% increase in capacity and extended secondary treatment to all of its inflow, NCWWTP remains out of compliance. As of 2014, NYC has failed to meet 1972 federal Clean Water Act for mandates for secondary treatment removal of 85% of pollutants from incoming sewage, or with New York State's 1992 order to NYC to prevent non-compliance overflows by 2013. A series of enforcement actions has generated multiple Notices of Violation and



Orders on Consent designed to bring New York City into compliance with the Clean Water Act without success.

Major zoning changes and large scale development continues unabated throughout the NCWWTP basin. The addition of a Megatower Group in an already dense area with a high volume of restaurants, hotels, education and healthcare facilities, as well as residences affects the capacity and flow control of the entire NCWWTP drainage system and adds to the likelihood of continued CSOs. The Two Bridges Megatower Project EIS must assess the full impacts to pipe and plant loading, as well as the adverse impacts from ongoing CSO overflow to the East River and other public waters.

- ii. The Scope of Work must analyze the additive impacts of the Megatower Group for possible compliance interference with Administrative and Consent Orders to the City of New York as well as continued listing of the Newtown Creek as an Impaired Water under the Federal Clean Water Act and current NYC SPDES permits

Currently, the New York City Department of Environmental Protection (DEP) is under a 2005 Order on Consent from the DEC pursuant to its SPDES permit to reduce CSOs from its sewer system to improve the water quality of its surrounding waters. In 2011, DEC and DEP identified numerous modifications to the CSO Consent Order, including integration of green infrastructure and substitution of more cost-effective grey infrastructure, and agreed to fixed dates for submittal of the Long-Term Control Plans (LTCP). The 2005 Order was updated and modified in 2012 with a penalty and new compliance requirements, to include an LTCP for NCWWTP.

As part of Clean Water Act requirements for periodic assessments of water quality, Section 303(d) of the Act requires states to identify "Impaired Waters" where specific designated uses are not fully supported, and for which the state must consider the development of a Total Maximum Daily Load (TMDL) or other strategy to reduce the input of the specific pollutant(s) that restrict waterbody uses in order to restore and protect such uses. In October of 2016, the DEC submitted to USEPA the Proposed Final New York State 2016 Section 303(d) List of Impaired/TMDL Waters. The list identifies those waters that do not support appropriate uses and that require development of a Total Maximum Daily Load (TMDL) or other restoration strategy.

Newtown Creek is included on the 2016 Section 303(d) List of Impaired waters by DEC. Newtown Creek was among several waterbodies approved for delisting in 2012 by USEPA because required control measures other than a TMDL were expected to result in attainment of water quality standards within a reasonable period of time. In approving the delisting, USEPA had determined that the updated 2005 Order was consistent with the National CSO Control Policy and that "pursuant to this policy the Long Term Control Plans (LTCPs), when implemented, are expected to result in the attainment of water quality standards."

However, the required controls as outlined in detail in the modified 2005 NYC CSO Consent Order have not been fully implemented. Therefore, rather than delist Newtown Creek in 2016, DEC opted to retain these waters on Part 3c of the listing as waterbodies for which TMDLs are deferred pending the submittal and approval of the waterbody-specific Long Term Control Plans (LTCPs) to address these pollutants. Upon DEC approval of LTCPs that meet the requirements of the Order, the waterbodies covered by the LTCP will be delisted and assigned to

a different followup category. The Newtown Creek LTCP was originally slated for completion by June of 2017.

On August 31, 2016, USEPA issued an Administrative Order to New York City requiring it to develop a plan to address continued sewer backups into residents' basements and other public and private property. The order gave the city 120 days to submit a plan to EPA for approval to work toward the elimination of unauthorized wastewater releases from sewer backups citywide over the next seven years.

This order notes that New York City has made progress in responding to complaints in recent years, but it does not have a *comprehensive plan* to prevent and further reduce the number of sewer backups. The order is designed to ensure that the city prevents sewer backups through a systematic and proactive program, as other large cities have. USEPA specifically noted that raw sewage in people's homes and in buildings where they work creates health risks, which can be avoided by a proactive strategy to cut sewage backups. The Plan would have been due by the end of 2016.

iii. Summary of Required Water/Sewer Analysis Scope for Two Bridges Megatower Group Analysis

Contrary to NYS laws and regulations, CEQR, and other legal requirements, the Draft SOW attempts to limit areas of assessment solely to drainage on the site where the megatowers will be constructed. In light of the facts and legal issues outlined above, particularly the ongoing violations of the Clean Water Act by the New York City sewage system, the Two Bridges Megatower Project EIS must assess the additive load from three megatowers to the entirety of the **system** affected, including:

- (a) The capacity of piping systems to transmit combined sewage and rainwater to the Newtown Creek Wastewater Treatment Plant (NCWWTP) without violation of law or permit requirements
- (b) Interference with flow control, sewer backup mitigation, access, and fair usage by other neighborhoods already reliant on the piping, overflow, basin, and pumping capacity of the Newtown Creek drainage area, including Chinatown, the Financial District, East Midtown, the Upper East Side, Financial District, Chelsea, Tribeca, and all other areas of eastern, lower, and lower western Manhattan in the NCWWTP drainage area
- (c) The capacity of the affected waters (East River, New York Harbor, Hudson River, Newtown Creek) to accept combined sewer outfalls from locations throughout the NCWWTP drainage area in light of current capacity overload in the NCWWTP system
- (d) The capacity of the NCWWTP itself to accept and process the combined sewer overflow from the drainage area
- (e) The high volume of combined sewer overflows already occurring in the NCWWTP drainage area
- (f) The massive additive load to the sewage system under construction, permitted, or planned (including major zoning expansions under consideration in the NCWWTP Drainage Area such as Midtown East) including but not limited to additive development in Chinatown, the

Financial District, East Midtown, the Upper East Side, Financial District, Chelsea, Tribeca, and all other areas of eastern, lower, and lower western Manhattan in the NCWWTP drainage area,

- (g) The effects with and without capital and operational elements of the Long Term Control Plan for the NCWWTP required by statute and consent order
- (h) The volume of sewer backup complaints and notices of violation in the NCWWTP drainage area
- (i) The high concentration of existing restaurants, hotels, medical facilities, retail food establishments, colleges and universities, schools, senior centers, food trucks, and other commercial and residential users of the sewer system components throughout the NCWWTP drainage area
- (j) Compliance with requirements of the Comprehensive Plan compelled by USEPA Administrative Order dated August 31, 2016 (Docket Number: CW A-02-2016-3012, which includes Newtown Creek WWTP Permit No. NY0026204)
- (k) Compliance with 2012 Consent Order as modified, including implementation of Long Term Control Plans
- (l) Compliance with standards required for de-listing of the Newtown Creek as an “Impaired Water” under section 303 of the Clean Water Act
- (m) Issuance of Section 78-313 Findings: The wastewater system assessment must be evaluated under Section 78-313 of the *Zoning Resolution of the City of New York*, and found in compliance with all applicable subsections, especially whether capacity and flow control increases in the Two Bridges LSRD from the proposed project will affect the City as a whole

Systemwide assessment is necessary because this EIS must evaluate combined sewage overflow and capacity not just for “impacts” but for substantive legal and financial requirements and implications.

- iv. The DSOW should evaluate whether a “Hookup Moratorium” is appropriate for the area pending completion of the Long Term Control Plan for the NCWWTP, and full compliance with the Consent and Administrative Orders noted above

The Two Bridges megatower Group is likely to have not only multiple adverse environmental effects, but affect investment decision-making for limited New York City funds available to meet Clean Water Act requirements made necessary by today’s overloads. Ongoing violations of the Clean Water Act such as those occurring now have resulted in serious consideration of a “hookup moratorium” in the past, a situation that may be again applicable given the overwhelming volumes of development added to the NCWWTP Drainage Area as well as the millions of additional square feet currently under construction, permitted, or planned in an area draining to an impaired water.

In light of the foregoing, the US Environmental Protection Agency (Region II), NYS Department of Environmental Conservation, and the NYC Department of Environmental Protection must be considered Involved Parties in the Two Bridges Megatower Group EIS, and included in its preparation.

7. Solid Waste

- i. The evaluation of solid waste must assess additive collection trips, including truck emissions and traffic congestion from pickup to final disposition of the discarded material, including impacts at the ultimate disposal site and transport corridors.
- ii. **Compliance with Section 78-313 Findings:** The solid waste assessment must be consistent with Findings under Section 78-313 of the *Zoning Resolution of the City of New York*, and found in compliance with all applicable subsections, including (b), (c), (d), and (g).

8. Energy

- i. The scope of the energy consumption analysis of the Two Bridges Megatower Group must include liquid fuel, natural gas, and electricity consumption, and should be integrated with the Air Quality analysis, especially as the energy production on- and offsite will create emissions directly attributable to consumption, operations, and maintenance of the Megatower Group. The scope of energy analysis should include, but is not limited to the following factors:
 - (a) The capacity of delivery systems to provide sufficient fuel and electric energy based on transmission and capacity planning for New York City, especially in light of planned closure of the Indian Point Nuclear Power Plant as a source of electric generation for operation and maintenance of the Megatower Group
 - (b) Interference with substation capacity, demand management, or other energy efficiency programs mandated by City, State and federal law, as well as total energy consumption reduction programs advocated by all agencies and divisions of the government of the City of New York
 - (c) Current and future capital spending requirements for generation, transmission, distribution, and demand management system requirements for electricity service to sustain electric load requirement of the service area in which the Two Bridges Megatower Group will be operated and maintained that will be passed through to ratepayers in the same system
 - (d) Supply and delivery system capacity for natural gas consumption requirements of the Two Bridges Megatower Group, including transmission, distribution and delivery capacity in the service system area
 - (e) Construction and placement capacity for the physical energy delivery components required, including pipes, wires, and other energy delivery infrastructure, with particular emphasis on availability subsurface, surface, and elevated capacity for safe emplacement of physical components,
- ii. **Compliance with Section 78-313 Findings:** The energy effects assessment must be consistent with Findings under Section 78-313 of the *Zoning Resolution of the City of New York*, and found in compliance with all applicable subsections, including (b), (c), (d), and (g). In particular, the Findings should be based on sufficient information and analysis showing that the construction and operation of the buildings themselves, as well as energy, waste han-

ding, and other operations and maintenance activities will not materially interfere with the energy infrastructure operating for the benefit of other buildings and residents in the LSRD.

9. Transportation

The DSOW claims that C6-4 zoning is “typically” mapped in areas in districts “well served” by transportation, the lead agency must demonstrate that current conditions continue to meet the “well served” standard. By most measures, the public transportation systems have developed into total inadequacy in light of the major increase in ridership, overcrowding, and deterioration of capital and maintenance. The ability to meet the flow and service conditions “presumed” by C6-4 zoning has a direct bearing on the granting of this Special Permit as a major modification, since resident and trip loads that exceed the C6-4 zoning parameters could be construed as a functional variance of the current zoning in addition to a major modification of a Special Permit. Air Quality MOVES data insufficient under 78-311 and 312

10. Involved Parties

The scope, scale, and environmental impacts presented by the addition of 4,775 new residences into a few square blocks coupled with the significant number of oversized, dense, and use intense infrastructure components cumulatively planned for the Newtown Creek Drainage area and Lower Manhattan in general, the following agencies must be involved in the DCP evaluation of the impacts of this and related projects:

1. Department of Housing and Urban Development (HUD): The full extent to which Federal funds will be used for capital, debt services, or lending leverage must be described in the DSOW, and HUD included as an involved agency in the event such monies are key to construction and operation. In the alternative, the DSOW must describe how the EIS will conform to any applicable HUD regulations under 24 CFR Part 58.
2. USEPA: The USEPA is an involved party due to significant legal compliance requirements affected by the project under two major statutes:
 - i. The Clean Water Act: USEPA Administrative Compliance Order No. CWA-02-2016-3012 for State Pollution Discharge Elimination System permit violations including NY0026204 pertaining to the Newtown Creek Wastewater Treatment Plant
 - ii. Comprehensive Environmental Response, Liability and Compensation Act (CERCLA, also known as “Superfund”) – Newtown Creek, the single location of wastewater treatment for the project and dozens of other large-scale developments adding to the will occur, is the site of a major Superfund Cleanup. A draft report of the investigative phase was submitted to EPA for review on November 15, 2016 pursuant to a Consent Order for the site. Given the sensitivity of the area to additive contaminants and the overarching need to comply with the federal cleanup requirements, USEPA expertise and oversight is required for the Two Bridges EIS.
3. NYSDEC: The State DEC has filed an Order on Consent (CSO Order Modification to C02-20000107-8; DEC Case No. C02-20110512-25) for violations of Article 17 of the Environmental Conservation Law and Part 750, et seq., of Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York. This Order includes completion of a Long Term Control Plan (LTCP) for the Newtown Creek, whose plant will be fed by the cumulative devel-

opment of the proposed action and multiple other oversized infrastructure projects that will cumulatively affect the NCWWTP.

4. NYCDEP: The DEP is legally responsible for New York City compliance with various sewage compliance orders affected by the proposed construction and operation of the Megatower Group.
5. FEMA: The Two Bridges LSRD is located in a mapped floodplain; introduction of over 5,000 new residences (including the current Extell Tower construction) requires involvement of the federal agency charged with assuring compliance with floodplain construction. FEMA involvement is particularly important given evidence of construction issues arising from the Extell Tower construction, including damage to infrastructure, water intrusion, and other built and natural infrastructure problems arising from attempting massive megatower builds in a floodplain.

IV. Project Alternatives

An EIS must contain an evaluation of “alternatives to the proposed action,” ECL §8-0109(2). The analysis of alternatives has been called the “driving spirit” of the SEQRA process. The SEQRA regulations require that a Draft EIS must include an alternatives analysis comparing the proposed action to a “range of reasonable alternatives...that are feasible, considering the objectives and capabilities of the project sponsor.” (§ 617.9(b)(5)(v)). The current scope fails to meet this legal requirement, and therefore reasonable alternative must be included.

The DSOW should include alternative development options consistent with zoning, density, and neighborhood recognition provisions laid out in the Chinatown Working Group rezoning plan.

The Chinatown Working Group plan has widespread support throughout the community, and includes specific provisions for the Two Bridges area (subdistrict D):

- A height limit of 350'
- Anti-harassment and anti-demolition certification
- C6-4 lots rezoned to C6-4 modified
- M1-4 and C2-8 walkway be mapped as Parkland
- All M1-6 lots be maintained as M1-6
- A guarantee of at least 50% affordable housing in new development at local AMI
- Large-scale development mapped as a Special Planned Community Preservation District
- A special permit requiring that any new residential development on public housing land be 100% low-income and a full ULURP review
- Climate Change/Resilience architecture, landscape, and open space features to accommodate sea level rise and water detention, including green infrastructure and retention tanks

Alternatives should also include DCP developed options for compatible uses of the target open space that is in keeping with required benefit to the residents and City as a whole. These can include:

- Development of a much needed electric vehicle charging station on Site 5 for use by the growing fleet of City electric vehicles
- Stand-alone grocery and other food market options that alleviate food desert issues for Two bridges without compromising the current air, light, density, and character features integral to the residential community

V. Cumulative Impacts

The DSOW fails to include legally required cumulative impact analysis. Although “cumulative impacts” are not defined by SEQRA or its implementing regulations, the DEC SEQR Handbook describes the requirements for their analysis (page 41):

These are impacts on the environment that result from the incremental or increased impact of an action(s) when the impacts of that action are added to other past, present and reasonably foreseeable future actions. Cumulative impacts can result from a single action or a number of individually minor but collectively significant actions taking place over a period of time. Either the impacts or the actions themselves must be related.

Cumulative impacts must be assessed when actions are proposed to or will foreseeably take place simultaneously or sequentially in a way that their combined impacts may be significant. Assessment of cumulative impacts is limited to consideration of probable impacts, not speculative ones.

In the case of the Two Bridges Megatower Group, all the EIS impact categories are affected by accumulated effects of multiple large-scale developments in the immediate neighborhood for the past several years, and expected into the future, e.g., Extell Tower, Essex Crossing, South Street Seaport residential and commercial, multiple hotels, and expanded museums, to name only a few examples. The accumulated load and impact to airshed, sewage, drinking water distribution, transportation, school, energy production and distribution, steam, open space and other assessment categories from this Megatower Group must be evaluated for its addition to the load burdens presented by the significant infrastructure, population, mobility, services, and other capacity burdens accumulating throughout the Lower Manhattan ecosystem.

Thank you for the opportunity to submit these comments and participate in the EIS process.

Very truly yours,

//s//

for

Lower East Side Organized Neighbors

Tany Castro-Negron, LE2RA

David Nieves, Seward Park Ext. & NMASS

Tony Queylin, Two Bridges Tower & NMASS

Irene HongPing Shen, CSWA

David Tieu, CSWA

CC: Nydia Velasquez, U.S. Congressman, 10th District of New York (by Email)
Gail Brewer, Manhattan Borough President (by Email)
Margaret Chin, City Council District 1 (by Email)
Daniel Squadron, New York State Senate (by Email)
Yuh-Line Niou, New York State Assembly (by Email)
Catherine R. McCabe, Acting Regional Administrator, US EPA Region 2
Basil Segos, Commissioner, New York State Department of Environmental Conservation
Robert J. Fenton, Jr., Administrator, Federal Emergency Management Agency
Mirza Orioles, Deputy Regional Administrator, US Dept. of Housing and Urban Development
Vincent Sapienza, Commissioner, New York City Department of Environmental Protection

Socioeconomic

Based on the presentation handouts at the 2nd Community Forum “50% community preference is the standard for the affordable housing lotteries overseen by HPD.” The median household income of zip 10002 is \$33,726 according to one source. This source goes on to state “the median household income for 10002 is less than 10003 (\$98,151), 10009 (\$59,090), 10012 (\$100,859), 10013 (\$96,667), 10038 (\$76,379), New York (\$53,373), and New York County (\$72,871).” The Lower East Side Power Partnership advocates that a portion of the affordable housing consider the AMI of zip 10002 for income levels.

The Lower East Side Power Partnership advocates for affordable housing for service and municipal workers i.e. fire fighters, nurses, police officers, sanitation workers, teachers from entry to seniority positions. The Lower East Side Power Partnership advocates for a portion of the affordable units being set aside for these middle-income households. In the 50-30-20 Mixed-Income Program “a minimum of 30% of units would be set aside for middle-income household.” We advocate for consideration of the rent and income levels for middle income households used by the 50-30-20 Mixed-Income Program administered by NYC Housing Development Corporation.

Per NYC webpage CEQR identifies any potential adverse environmental effects of proposed actions, assesses their significance, and proposes measures to eliminate or mitigate significant impacts.

Jobs- Socioeconomic/Neighborhood Character

The Draft Scope of work Socioeconomic section states “The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area. This chapter will assess the proposed actions’ potential effects on the socioeconomic character of the surrounding area.”

The Draft Scope of work Neighborhood Character “Assess and summarize the proposed actions’ effects on neighborhood character using the analysis of impacts as presented in other pertinent EIS sections (particularly socioeconomic conditions, open space, urban design and visual resources, shadows, traffic, and noise).”

The Lower East Side Power Partnership previously wrote a letter on February 17, 2017 to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers stating the median household income of zip 10002 is \$33,726 according to one source. This source goes on to state “the median household income for 10002 is less than 10003 (\$98,151), 10009 (\$59,090), 10012 (\$100,859), 10013 (\$96,667), 10038 (\$76,379), New York (\$53,373), and New York County (\$72,871).

Lower East Side Power Partnership also wrote advocating for a structured approach to outreach and recruitment of community residents for employment. LESPP advocates for employment of residents of zip codes 10002, 10009, 10038 at all levels of employment. LESPP advocates for Union employment of all levels of hiring for our community residents. LESPP would like the developers to sponsor residents for union positions.

LESPP also wrote a letter December 27, 2016 with several concerns about job development for Lower East Side residents. The Lower East Side Power Partnership advocates that part of Workforce Development include a breakdown of how many people are hired from zips 10002, 10009 and 10038. We also request a breakdown of the job titles and date of hire of our residents. We would like this information sent to a designated worker in your office and shared with the community.

LESPP advocates for the consideration and analysis of providing job opportunities for the residents of zip 10002. Job opportunities would potentially positively impact low income populations of zip 10002.

Secondary Displacement

According to Two Bridges Community Meeting #1 Question and Answer Sheet "In an EIS, secondary displacement is defined as the involuntary displacement of residents in housing units that are not subject to rent restrictions, resulting from the changes in area income levels caused by a proposed project. " It also states that mitigation measures can include "preservation of existing rent-regulated housing in the area."

The Lower East Side Power Partnership is concerned and have heard voices of concern in the community about this issue.

According to ProPublica "410 Grand Street (owner- Grand Street Guild HDFC) has had 104 eviction cases from Jan 2013-June 2015, 460 Grand St (owner-Southeast Grand Street) has had 93 eviction cases from Jan. 2013-June 2015." These buildings are in close proximity to the new residential housing of Essex Crossing which has quite a bit of fair market housing.

According to ProPublica "82 Rutgers Slip..has had 135 Eviction Cases from Jan. 2013 to June 2015" This building is in close proximity to the new residential housing of Extell at 1 Manhattan Square which has one building devoted to luxury housing.

Residents of the Lower East Side are concerned because they believed these residential buildings (410 Grand St, 460 Grand St, 82 Rutgers St) were subject to rent restrictions. There is anxiety that this could happen to other people on the Lower East Side in what is defined as subject to rent restrictions.

LESPP wrote a letter December 27, 2016 to Manhattan Borough President Gale Brewer and copied our elected officials and the Two Bridges Developers about indirect displacement. LESPP stated that indirect displacement of residents often happens because lower income residents are forced to move due to rising rent caused by the new higher-income standards. We advocated for anti-harassment interventions and support for residents.

LESPP also wrote a letter February 17, 2017 stating that the median household income of zip 10002 is \$33,726 according to one source. This source goes on to state "the median household income for 10002 is less than 10003 (\$98,151), 10009 (\$59,090). 10012 (\$100,859), 10013 (\$96,667), 10038 (\$76,379), New York (\$53,373), and New York County (\$72,871)."

The Lower East Side Power Partnership advocates for analysis of secondary displacement to include housing that is subject to rent restriction. LESPP also advocates for consideration of mitigation strategies to include anti-harassment interventions and available Social Service Assistance in at least English, Spanish and Chinese for residents living in zip 10002 in affordable resident units.

Neighborhood Character-CWG

According to the Two Bridges Community Meeting #1 Questions & Answers “The Pratt Center/Collective Partnership prepared the Plan for Chinatown and Surrounding Areas for the Chinatown Working Group in 2013. The Pratt study analyzes urban planning topics throughout a broad geography spanning from Lower Manhattan to 14th Street, and does not specifically study environmental impacts. Moreover, the Pratt study does not consider the potential impacts of the three proposed projects, and therefore does not meet the requirements of an EIS that can be used by the CPC under the City and State environmental quality review regulations. “

The Lower East Side Power Partnership advocates for what is defined in this report for Sub-district B, Option 2 which are logical principles concerning environmental impact for any new community development in any neighborhood:

1. New housing construction or enlargement is at rents that will not substantially alter the present mix of income groups or reduce the number of units
2. New development or enlargements relate to the existing buildings or other structures in scale and design, and will not seriously alter the scenic amenity and the environmental quality
3. Development or enlargement maximizes Climate Change resilience and adaptation measures relating to built form and permeable surfaces

The Lower East Side Power Partnership previously wrote to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers stating the Two Bridges Project buildings appear to be in what is defined as sub district D in The Plan for Chinatown and Surrounding Areas, Preserving Affordability & Authenticity, Recommendations to the Chinatown Working Group, Pratt Center for Community Development. Several residents made reference to this report (in community meeting #1) and asked was it considered.

The Lower East Side Power Partnership advocates for consideration and analysis of this portion of the Plan for Chinatown and Surrounding Areas in the Environmental Impact Statement. LESPP believes these three issues do have an impact on the environment. LESPP believes that new housing construction at rents that will substantially alter the present mix of income groups will impact the environment. LESPP believes that new development that doesn't relate to the existing buildings in scale and design and alters the scenic amenity and environmental quality does impact the neighborhood. LESPP believes that developments that do not maximize climate change resilience will impact the environment. LESPP believes that these statements considers the impact of any new developments in any community. LESPP believes that these issues will have an impact on the Two Bridges Project environment and should be addressed in the Environmental Impact Statement.

Senior Displacement

According to the EAS FULL FORM 11a_“For Site 4(4A/4B), in preparation for the proposed project, the 10 units at 80 Rutgers Slip that would be relocated to the new building would be vacated. This would occur (i) as existing residents leave the 10 units, or (ii) by moving residents of these units to other units that become available in the building or in a nearby building”.

LESPP is very disturbed that plans are to uproot Seniors from their homes. Especially, for Seniors a regular daily routine generally reduces stress and anxiety, increases feelings of safety and security and fosters better sleep.

The Lower East Side Power Partnership (LESPP) wrote a letter February 2, 2017 to Manhattan Borough President Gale Brewer and copied our elected officials and the Two Bridges developers concerning Senior displacement due to the Two Bridges Project. LESPP advocated that:

1. a relative be contacted for each Senior that is temporarily displaced.
2. translation services for all Seniors for whom English is not their first language be provided.
3. the Manhattan Borough President office be informed of the Senior’s name, apartment # displaced from and to, age, date of displacement and when they are returned home
4. the Manhattan Borough President’s office meet with community leaders and share age, date of displacement and when they are returned to their home
5. special consideration and services for those seniors who are extremely anxious concerning moving and changing their routine be provided

LESPP wrote a second letter dated February 17, 2017 advocating for Seniors that:

1. are displaced and would like to stay in the displaced apartment be allowed to do this
2. consideration of extra assistance for those who do not want to leave their home and need to be displaced for construction purposes
3. all Seniors who want to return to their homes to be able to do so.

LESPP would like JDS Development Group, the developer for 247 Cherry Street, to consider and analyze the concerns and approaches to Senior Displacement stated above. LESPP would like a more detailed analysis of the displacement process with vulnerable Seniors.

Transportation

According to the draft scope of work AKRF Draft Travel Demand Factors Memorandum page 9 “the incremental bus trips generated by the proposed projects would be 113, 64, and 127 person trips during the weekday AM, midday, and PM peak hours, respectively. Considering that these trips would be further dispersed among the multiple local bus routes serving the study area, including the M9, M15, M15Select and M22, no single bus route would exceed the CEQR Technical Manual analysis threshold of 50 or more peak hour bus riders in a single direction. Therefore, a detailed bus line-haul analysis would not be warranted, and the proposed projects are not expected to result in any significant adverse bus line-haul impacts”

The Lower East Side Power Partnership (LESPP) wrote a letter in February 2017 to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers advocating for M15 Select Bus stops (uptown and downtown) on Pike Street between Madison St and Henry St. We stated that the M22 traveling in both directions stops on Madison St at the corner of Pike St. Presently the M15 non-Select Service, traveling uptown and downtown stops on Pike Street between Madison St & Henry Street.

The AKRF statement above includes the M15 Select as one of the bus routes serving the study area. The nearest M15 Select is either Madison St between Catherine and Oliver Streets or Pike Street near the corner of Grand St. The southbound M22 never connects with the M15Select. The Lower East Side Power Partnership believes that the addition of approximately 660 residential units at 247 Cherry St, approximately 1,350 residential units at 260 South St and approximately 765 residential units at 259 Clinton St warrants the consideration and analysis in the EIS process of an addition of uptown and downtown M15 Select buses for Pike Street between Madison St and Henry St.

LESPP letter in February written to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers advocated for additional M22 buses which transport riders from the Two Bridges area to subways, the City Hall area and schools etc.. LESPP believes that the additional residential units planned for the Two Bridges area warrants the consideration and analysis in the EIS process of additional M22 buses.

LESPP letter in February written to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers advocated for a larger East Broadway F train station and elevators for accessibility. One elevator from the street level to the payment level and a second elevator from the station service booth level, after payment, to the train platform. LESPP also advocates for up and down escalators from street level to station service booth level and a down escalator from station service booth level, (after payment), to the train platform. We would appreciate a long lasting LED lighting system in this station. This is the only subway station in the Two Bridges area. LESPP advocates for the consideration and analysis of the availability and accessibility train needs of our community members with mobility limitations.

Schools

The Lower East Side Power Partnership advocates that the sub-district, that includes PS 110, PS 134 and PS 184, be analyzed. LESPP advocates that various mitigation strategies be analyzed for the Environmental Impact Statement.

Health Care

Manhattan Community District 3 accounts for approximately one fifth of the people identified as Medicaid only in the borough of Manhattan by the NYC Department of City Planning (DCP). Manhattan Community District 3 in 2014 had 49,405 people who were identified as Medicaid only by the NYC Dept of City Planning. The borough of Manhattan had 241,126 people identified as Medicaid Only in 2014.

There are no full service hospitals in Manhattan Community District 3.

A goal of the Delivery System Reform Incentive Payment (DSRIP), generated by the Medicaid Redesign Team reforms, is "to achieve a 25 percent reduction in avoidable hospital use over five years." The closest Urgent Care Center to the Two Bridges Area is a City MD on Delancey Street. According to the CityMD website "CityMD does not accept straight Medicaid we do participate in many managed Medicaid plans."

NYU is expected to open a medical facility on Delancey St. NYU was not designated as a safety net hospital for the DSRIP Program. According to LESPP analysis of DSRIP material NYU has less than 25% visits by people with Medicaid insurance in outpatient visits and inpatient discharges.

LESPP advocates that health care be analyzed and included in the study for the environmental impact statement.

Lower East Side

**POWER
PARTNERSHIP**

POB 1063 Stuyvesant Station, 432 E 14th ST, NYC 10009

Tel: 212 204-0668 Email: lespowerpartnership@gmail.com
Facebook: LESPowerPartnership

June 8, 2017

Robert Dobruskin, AICO Director
120 Broadway, 31st Floor
New York, NY 10271

Dear Mr Dobruskin:

The Lower East Side Power Partnership (LESPP) attended Two Bridges Environmental Review and Input Sessions. Representatives of the LESPP were in attendance, observed the power point presentation, listened to concerns of community residents and wrote letters to Manhattan Borough President Gale Brewer and copied local elected representatives as well as the identified developers.

A LESPP representative gave a testimony at the Scoping Hearing on May 25, 2017 and submitted written statements. The written statements addressed the following LESPP concerns: Health Care, Jobs-Socioeconomic/Neighborhood Character, Neighborhood Character-Chinatown Working Group Report, Secondary Displacement, Senior Displacement, Socioeconomic-AMI Zip 10002/Workers and Transportation.

Sincerely,

Vaylateena Jones
Lower East Side Power Partnership
Executive Partner

Lower East Side

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PARTNERSHIP**

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Socioeconomic-AMI Zip 10002/Workers

Based on the presentation handouts at the 2nd Community Forum “50% community preference is the standard for the affordable housing lotteries overseen by HPD.” The median household income of zip 10002 is \$33,726 according to one source. This source goes on to state “the median household income for 10002 is less than 10003 (\$98,151), 10009 (\$59,090), 10012 (\$100,859), 10013 (\$96,667), 10038 (\$76,379), New York (\$53,373), and New York County (\$72,871).” The Lower East Side Power Partnership advocates that a portion of the affordable housing consider the AMI of zip 10002 for income levels.

The Lower East Side Power Partnership advocates for affordable housing for service and municipal workers i.e. fire fighters, nurses, police officers, sanitation workers, teachers from entry to seniority positions. The Lower East Side Power Partnership advocates for a portion of the affordable units being set aside for these middle-income households. In the 50-30-20 Mixed-Income Program “a minimum of 30% of units would be set aside for middle-income household.” We advocate for consideration of the rent and income levels for middle income households used by the 50-30-20 Mixed-Income Program administered by NYC Housing Development Corporation.

Per NYC webpage CEQR identifies any potential adverse environmental effects of proposed actions, assesses their significance, and proposes measures to eliminate or mitigate significant impacts.

Lower East Side

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Neighborhood Character- Chinatown Working Group Report

According to the Two Bridges Community Meeting #1 Questions & Answers “The Pratt Center/Collective Partnership prepared the Plan for Chinatown and Surrounding Areas for the Chinatown Working Group in 2013. The Pratt study analyzes urban planning topics throughout a broad geography spanning from Lower Manhattan to 14th Street, and does not specifically study environmental impacts. Moreover, the Pratt study does not consider the potential impacts of the three proposed projects, and therefore does not meet the requirements of an EIS that can be used by the CPC under the City and State environmental quality review regulations. “

The Lower East Side Power Partnership advocates for what is defined in this report for Sub-district B, Option 2 which are logical principles concerning environmental impact for any new community development in any neighborhood:

1. New housing construction or enlargement is at rents that will not substantially alter the present mix of income groups or reduce the number of units
2. New development or enlargements relate to the existing buildings or other structures in scale and design, and will not seriously alter the scenic amenity and the environmental quality
3. Development or enlargement maximizes Climate Change resilience and adaptation measures relating to built form and permeable surfaces

The Lower East Side Power Partnership previously wrote to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers stating the Two Bridges Project buildings appear to be in what is defined as sub district D in The Plan for Chinatown and Surrounding Areas, Preserving Affordability & Authenticity, Recommendations to the Chinatown Working Group, Pratt Center for Community Development. Several residents made reference to this report (in community meeting #1) and asked was it considered.

The Lower East Side Power Partnership advocates for consideration and analysis of this portion of the Plan for Chinatown and Surrounding Areas in the Environmental Impact Statement. LESPP believes these three issues do have an impact on the environment. LESPP believes that new housing construction at rents that will substantially alter the present mix of income groups will impact the environment. LESPP believes that new development that doesn't relate to the existing buildings in scale and design and alters the scenic amenity and environmental quality does impact the neighborhood. LESPP believes that developments that do not maximize climate change resilience will impact the environment. LESPP believes that these statements considers the impact of any new developments in any community. LESPP believes that these issues will have an impact on the Two Bridges Project environment and should be addressed in the Environmental Impact Statement.

Lower East Side

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Secondary Displacement

According to Two Bridges Community Meeting #1 Question and Answer Sheet “In an EIS, secondary displacement is defined as the involuntary displacement of residents in housing units that are not subject to rent restrictions, resulting from the changes in area income levels caused by a proposed project. “ It also states that mitigation measures can include “preservation of existing rent-regulated housing in the area.”

The Lower East Side Power Partnership is concerned and have heard voices of concern in the community about this issue.

According to ProPublica “410 Grand Street (owner- Grand Street Guild HDFC) has had 104 eviction cases from Jan 2013-June 2015, 460 Grand St (owner-Southeast Grand Street) has had 93 eviction cases from Jan. 2013-June 2015.” These buildings are in close proximity to the new residential housing of Essex Crossing which has quite a bit of fair market housing.

According to ProPublica “82 Rutgers Slip..has had 135 Eviction Cases from Jan. 2013 to June 2015” This building is in close proximity to the new residential housing of Extell at 1 Manhattan Square which has one building devoted to luxury housing.

Residents of the Lower East Side are concerned because they believed these residential buildings (410 Grand St, 460 Grand St, 82 Rutgers St) were subject to rent restrictions. There is anxiety that this could happen to other people on the Lower East Side in what is defined as subject to rent restrictions.

LESPP wrote a letter December 27, 2016 to Manhattan Borough President Gale Brewer and copied our elected officials and the Two Bridges Developers about indirect displacement. LESPP stated that indirect displacement of residents often happens because lower income residents are forced to move due to rising rent caused by the new higher-income standards. We advocated for anti-harassment interventions and support for residents.

LESPP also wrote a letter February 17, 2017 stating that the median household income of zip 10002 is \$33,726 according to one source. This source goes on to state “the median household income for 10002 is less than 10003 (\$98,151), 10009 (\$59,090). 10012 (\$100,859), 10013 (\$96,667), 10038 (\$76,379), New York (\$53,373), and New York County (\$72,871).”

The Lower East Side Power Partnership advocates for analysis of secondary displacement to include housing that is subject to rent restriction. LESPP also advocates for consideration of mitigation strategies to include anti-harassment interventions and available Social Service Assistance in at least English, Spanish and Chinese for residents living in zip 10002 in affordable resident units.

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Senior Displacement

According to the EAS FULL FORM 11a “For Site 4(4A/4B), in preparation for the proposed project, the 10 units at 80 Rutgers Slip that would be relocated to the new building would be vacated. This would occur (i) as existing residents leave the 10 units, or (ii) by moving residents of these units to other units that become available in the building or in a nearby building”.

LESPP is very disturbed that plans are to uproot Seniors from their homes. Especially, for Seniors a regular daily routine generally reduces stress and anxiety, increases feelings of safety and security and fosters better sleep.

The Lower East Side Power Partnership (LESPP) wrote a letter February 2, 2017 to Manhattan Borough President Gale Brewer and copied our elected officials and the Two Bridges developers concerning Senior displacement due to the Two Bridges Project. LESPP advocated that:

1. a relative be contacted for each Senior that is temporarily displaced.
2. translation services for all Seniors for whom English is not their first language be provided.
3. the Manhattan Borough President office be informed of the Senior’s name, apartment # displaced from and to, age, date of displacement and when they are returned home
4. the Manhattan Borough President’s office meet with community leaders and share age, date of displacement and when they are returned to their home
5. special consideration and services for those seniors who are extremely anxious concerning moving and changing their routine be provided

LESPP wrote a second letter dated February 17, 2017 advocating for Seniors that:

1. are displaced and would like to stay in the displaced apartment be allowed to do this
2. consideration of extra assistance for those who do not want to leave their home and need to be displaced for construction purposes
3. all Seniors who want to return to their homes to be able to do so.

LESPP would like JDS Development Group, the developer for 247 Cherry Street, to consider and analyze the concerns and approaches to Senior Displacement stated above. LESPP would like a more detailed analysis of the displacement process with vulnerable Seniors.

Lower East Side

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Transportation

According to the draft scope of work AKRF Draft Travel Demand Factors Memorandum page 9 “the incremental bus trips generated by the proposed projects would be 113, 64, and 127 person trips during the weekday AM, midday, and PM peak hours, respectively. Considering that these trips would be further dispersed among the multiple local bus routes serving the study area, including the M9, M15, M15Select and M22, no single bus route would exceed the CEQR Technical Manual analysis threshold of 50 or more peak hour bus riders in a single direction. Therefore, a detailed bus line-haul analysis would not be warranted, and the proposed projects are not expected to result in any significant adverse bus line-haul impacts”

The Lower East Side Power Partnership (LESPP) wrote a letter in February 2017 to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers advocating for M15 Select Bus stops (uptown and downtown) on Pike Street between Madison St and Henry St. We stated that the M22 traveling in both directions stops on Madison St at the corner of Pike St. Presently the M15 non-Select Service, traveling uptown and downtown stops on Pike Street between Madison St & Henry Street.

The AKRF statement above includes the M15 Select as one of the bus routes serving the study area. The nearest M15 Select is either Madison St between Catherine and Oliver Streets or Pike Street near the corner of Grand St. The southbound M22 never connects with the M15Select. The Lower East Side Power Partnership believes that the addition of approximately 660 residential units at 247 Cherry St, approximately 1,350 residential units at 260 South St and approximately 765 residential units at 259 Clinton St warrants the consideration and analysis in the EIS process of an addition of uptown and downtown M15 Select buses for Pike Street between Madison St and Henry St.

LESPP letter in February written to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers advocated for additional M22 buses which transport riders from the Two Bridges area to subways, the City Hall area and schools etc.. LESPP believes that the additional residential units planned for the Two Bridges area warrants the consideration and analysis in the EIS process of additional M22 buses.

LESPP letter in February written to Borough President Gale Brewer and copied our elected officials and the Two Bridges developers advocated for a larger East Broadway F train station and elevators for accessibility. One elevator from the street level to the payment level and a second elevator from the station service booth level, after payment, to the train platform. LESPP also advocates for up and down escalators from street level to station service booth level and a down escalator from station service booth level, (after payment), to the train platform. We would appreciate a long lasting LED lighting system in this station. This is the only subway station in the Two Bridges area. LESPP advocates for the consideration and analysis of the availability and accessibility train needs of our community members with mobility limitations.

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Comments: Draft Environmental Impact Statement Public Scoping Meeting for Two Bridges Large Scale Residential Development (LSRD) Modifications

The undersigned respectfully submit these written comments in response to the Public Scoping Meeting for the Draft Environmental Impact Statement (DEIS) concerning the proposed modifications to the Two Bridges LSRD. After reviewing the Draft Scope of Work for the DEIS, we believe it is clear that certain *fatal flaws* exist in the DEIS Scoping Documents. The DEIS Scope and the environmental review generally must be broader, deeper, and more accurate. In short, in order to take the legally required “hard look” at the proposed LSRD modifications, the DEIS must be dramatically improved and the errors, issues, omissions, and lack of clarity outlined below must be addressed.

Fatal Flaws in Scope of Work

- ❖ 2,775 proposed new residential units, ***0 new parking spaces***
- ❖ TDF memo ***does not assess true demand***
- ❖ Number of parking facilities stated is ***untrue and misleading***
- ❖ ***Open space reduction*** of 100,000+ sf
- ❖ Zoning Lot Expansion ***not consented to by parties in interest***
- ❖ Proposed cantilever ***in violation of rights of ground lessee***
- ❖ Alternatives, Air Quality, etc. ***not sufficiently addressed***

Substantial Transportation & Parking Deficiencies

Fatal Flaw #1: While 2,775 Additional Residential Units are Being Proposed, Zero (0) Additional Parking Spaces Are Included

A dramatic and telling concern with the DEIS Scope is *parking*. With 2,775 new dwelling units proposed — a *200% increase* in residential units over the existing 1,360 residential units — no new off-street parking is provided.

Indeed, the LSRD Zoning Calculations chart shows a *reduction* of 4 spaces from the existing 190 parking spaces for a total of 186 parking spaces. This means that 4,135 residential units will have a total of 186 parking spaces available on site. This 4% parking ratio means that

there will be 1 parking space available for every 22 housing units. This drastic lack of parking fails to account for the car ownership rates for nearly 3,000 anticipated apartments. The failure to consider parking will have a significant impact on traffic, air quality, due to idling and circling, and general quality of life given the hundreds of cars in search of parking.

Additionally, new residents' transportation habits (including taxis, black cars, uber, lyft, and any other ride sharing services) must be taken into account. This impact must be assessed.

Fatal Flaw #2: TDF Memorandum Does Not Assess True Demand for Parking & Traffic

The Travel Demand Factors Memo bases all of its traffic and parking assumptions on the Future With Proposed Actions from the incremental increases in the Reasonable Worst Case Development Scenario. Only the increase between the existing and proposed is being considered when determining which streets/intersection to study. Additionally, the Essex Crossing/Seward Park development is not mentioned nor considered for potential impact. Such a major development within a very close proximity with build years aligning with the 2 Bridges application must be considered for potential cumulative impact.

This approach fails to address the aggregate impact of existing and proposed. By omitting the existing uses and occupants and other new/proposed uses and occupants, the **true demand is not factored**. This will almost certainly lead to an improper and insufficient review of the potential impacts of the proposed developments.

Fatal Flaw #3: Number of Parking Facilities Stated is Untrue

The second issue with the Travel Demand Factors Memo is the assumptions regarding the availability of off-street parking in the neighborhood. Page 5 of the TDF memo states "*there are nine off-street parking facilities identified within approximately ¼-mile of the project sites*". Following this paragraph there is a map that, contrary to that representation, there are at most *4 off-street parking facilities* within ¼ mile of the project sites; and one of these parking facilities (currently with a 400 car parking capacity) is slated for redevelopment and accordingly likely to leave the market. Additionally, several of the remaining parking facilities have long wait lists and a severe lack of availability. This makes the stated amount of available parking suspect.

While the proposal calls for the reduction of 4 existing parking spaces and adding 2,775 new residential units, the TDF memo grossly overstates how many off-street parking facilities are within a ¼ mile of the site.

Fatal Flaw #4: Open Space will be reduced by 100,000+ sf; The Open Space Is Already Under Control of Little Cherry, as Ground Tenant, and Cannot Be Made Available Without the Tenant's Prior Consent

Page 6 of the Draft Scope states that “the open space on Lots 15, 70, and 76 would be improved”. According to the Draft Scope, Lot 76 has 280 square feet of open space. No indication is made as to how this space will be improved.

Furthermore, and critically, there is a Ground Lease on Lot 76 where Little Cherry LLC is the Ground Tenant. Under that Ground Lease, the Tenant is given dominion and control over, and responsibility to take care of, the Lot 76 open space. There is no indication as to how the open space on Lot 76 can possibly be “improved,” or altered, since Little Cherry already controls that space on Lot 76 and Little Cherry’s prior consent would have to be obtained since it is already covered by its long term ground lease. The omission of that factor misleadingly just presumes a right to improve space. See table A-2 where open space for Site 4A/4B is reduced from 43,920 sf to 37,530 sf. No mitigation is proposed.

It is likely that should the proposed development go forward, this open space will significantly decrease in quality due to the 1000 foot tower being built literally directly over Lot 76. The claim that any open space will be improved is also suspect given that the LSRD Zoning Calculations chart (see Page A-2 in the Appendix to the Draft Scope) states that the existing amount of open space within the boundaries of the large scale plan is 275,121 square feet and the proposed amount of open space is 169,043 square feet - a loss of over 100,000 square feet of open space! Such a massive reduction cannot be considered an improvement and the impacts of the loss of this space must be studied and understood. The claim that open space is being improved is disingenuous, at best.

Fatal Flaw #5: **Misleading Presumption About Right to Develop Absent Consent of “Parties in Interest”**

❖ Consent is Required; Ground Lessee of Lot 76 Will Not Consent

Not only the Draft Scope wrongly presume that the ground lessee for Lot 76 will give its consent to the proposed open space improvements, but, even more critically, it wrongly presumes the consent (or the absence of the need for such consent) of the ground lessee for the entire proposed redevelopment of Site 4.

A threshold issue, with respect to the proposed redevelopment of Site 4, is the blatant failure to acknowledge the voiced objection of the long-term ground lessee for this site without whose consent the development cannot proceed. The ground lessee for Lot 76 (on Site 4) is a “party-in-interest” — certified as such in 2008 in a recorded document when the existing zoning lot was formed) — such that any further expansion of the zoning lot requires its consent (and that of its mortgagee), as dictated by the ZR. The ground lessee has made clear that it will not consent to the proposed cantilever shown in the proposed project.

For example, in reference to the proposed development of Site 4, Page 3 of the Draft Scope of Work states that “An as-of-right zoning lot merger will be required in order to facilitate this project”. Characterizing the zoning lot merger as “as-of-right” inaccurately depicts the current legal status of the zoning lot. Although alternatives to the proposed development are possible, without consent from all parties in interest, the project described in the DEIS Scope cannot move forward as it is currently constituted.

Furthermore, the Draft Scope of work somehow assumes that the Lot 76 commercial building will be “re-tenanted”. The ground lease runs through 2044 and the sub-tenanting of that space is in the hands of the ground lessee. Given the disconnect between the applicant and the long term ground lessee, any assumptions associated with the Lot 76 building may be faulty and are misleading to the reader.

Fatal Flaw #6: The Proposed Cantilever and Construction will interfere with the Ground Leased Space

Additionally, it should be noted that while Lot 76 is occupied by a 1-story commercial building, there is no specific limitation on the height of this single story building in the Zoning Resolution or in the ground lease. The existing building could, among other possibilities, be reconstructed with the same floor area but with a height that would disrupt the proposed project’s cantilever or cause violations of the building and fire codes. Because the proposed cantilever will dramatically limit the height of a potential redevelopment of Lot 76 building, this matter should be disclosed as it will affect the proposed project.

Furthermore, the construction of the proposed tower would severely affect the leased premises during the period of construction and, then once, build impede the future commercial businesses located there. It is not even clear whether it is possible to construct the cantilever building while maintaining the permitted commercial space in the ground lease.

The proposed cantilever was not consented to and should not be considered.

Fatal Flaw #7: Alternatives, Air Quality, etc. Not Sufficiently Addressed

Alternatives

The no action and the unmitigated proposed action are the only development schemes being reviewed specifically. The requirement that an EIS review alternatives should be taken seriously. Alternatives for the redevelopment of Site 4 exist and must be considered in the EIS. Less impactful developments have been proposed and must be reviewed. Community Board 3 has alternatives that must be examined.

Shadows, Air Quality, Neighborhood Character

These chapters in the EIS must be addressed with extreme diligence. The impacts on these categories cannot be overstated.

Shadows

The development of three massive towers along the East River waterfront will cast such a tremendous shadow on the site itself and the surrounding area. With no buildings taller than

the proposed developments between the site and the East River, it is guaranteed that the site and its neighbors will be cast in shadow nearly the entire first half of the day.

Air Quality

The 2,775 new residential units will bring cars and activity that will negatively impact air quality in and around the site. The lack of additional parking will mean that hundreds of cars will be circling and idling at all hours of the day and night, in a constant search for parking. These cars will create air quality conditions that must not be overlooked.

Neighborhood Character

The negative impact associated with the development of three massive towers along the East River waterfront cannot be ignored. Reductions of views to and from the East River will actively erode this neighborhood's character. Additionally, the proposed built form of the three buildings makes no attempt to maintain a certain character. The proposals make no effort to build in context or with the neighborhood in mind.

From: "Robert Dobruskin (DCP)" <RDOBRUS@planning.nyc.gov>
To: "Evan Lemonides (DCP)" <ELEMONIDES@planning.nyc.gov>, "Samuel Nourieli (DCP)" <SNOURIELI@planning.nyc.gov>, "Joel Kolkmann (DCP)" <JKOLKMANN@planning.nyc.gov>, "Xinyu Liang (DCP)" <XLiang@planning.nyc.gov>
Cc: "Erik Botsford (DCP)" <EBOTSFORD@planning.nyc.gov>, "Rachaele Raynoff (DCP)" <RRAYNOFF@planning.nyc.gov> Bcc:
Date: Tue, 30 May 2017 13:57:01 +0000
Subject: FW: MAS Comments to DCP on Two Bridges LSRD

From: Marcel Negret [<mailto:mnegret@mas.org>] **Sent:** Thursday, May 25, 2017 2:06 PM
To: RobertDobruskin (DCP) <RDOBRUS@planning.nyc.gov> **Cc:** Thomas Devaney <tdevaney@mas.org>
Subject: MAS Comments to DCP on Two Bridges LSRD

Dear Mr. Dobruskin,

Please find attached MAS comments regarding the Two Bridges Large Scale Residential Development, Manhattan Community Board 3, CEQR No. 17DCP148M, Manhattan, NY

Please reach out if you have any questions.

Thank you for your time.

All best,

Marcel

Marcel Negret

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CHAIRMAN
FREDERICK ISEMAN

**MAS Comments on Two Bridges Large Scale Residential Development, Manhattan
Community Board 3, CEQR No. 17DCP148M, Manhattan, NY**

PRESIDENT
ELIZABETH GOLDSTEIN

May 25, 2017

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Background

The New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), has issued a Draft Scope of Work for Preparation of a Draft Environmental Impact Statement (DSOW) for a proposed development of three new mixed-use buildings within the Two Bridges Large Scale Residential Development (LSRD) in the Lower East Side neighborhood of Manhattan. The project has three applicants—each seeking separate minor modifications to the existing LSRD site plan and zoning calculations. These actions would result in the overall development of over 2.5 million gross square feet (gsf) of residential space, including 2,775 dwelling units (DUs), 200 of which will be senior housing, and up to 694 affordable DUs, 17,028 gsf of community facilities, and 10,888 gsf of retail.

Position

The Municipal Art Society of New York (MAS) has grave concerns about the proposed development from both a planning and environmental perspective.

From a planning standpoint, we find the magnitude of the proposed development extremely disproportionate with the surrounding area and lacking in foresight. With over 2.5 million gsf of residential space, nearly 3,000 dwelling units, and almost 6,000 new residents in a low-income area, the development provides only 25 percent affordable dwelling units, approximately 11,000 sf of retail space, and 103 parking spaces.

In terms of environmental impacts, the development would introduce such a significant new population—75 percent of which would be market-rate tenants—that it would be nearly impossible to not result in an abrupt change in the socioeconomic conditions and character of the neighborhood. We are certain it would lead to substantial indirect displacement of low-income area residents. This is particularly alarming since the median income of the immediate and adjacent census tracts ranges from \$18,944 to \$29,418.¹ It is also expected that the new population would overburden area public schools, libraries, child-care facilities, and other publicly funded services.

Furthermore, as a measure of the scope of potential adverse environmental impacts, the development would substantially exceed CEQR thresholds and require extensive evaluations in 17 out of 19 environmental categories. For example, the CEQR trigger for requiring an expanded analysis on open space impacts in the project area is the introduction of 200 residents. The proposed projects exceed that threshold by a factor of 30!

Of particular importance are the significant adverse effects the proposal would have on the following areas:

- Open Space – The demand the new residents, including senior residents, would place on limited existing open space in the area;

¹ Based on U.S. Census, income in the past 12 months, inflation-adjusted dollars. 2010-2014 American Community Survey 5-year estimates. New York County Census Tracts: 6, 9, and 2.02

- Shadows – The three towers will likely cast significant shadows on nearby parks, namely Seward Park, Little Flower Playground, and Cherry Clinton Playground, and the East River;
- Archaeological Resources – The Landmarks Preservation Commission has determined that there is potential for the recovery of remains from Colonial and 19th Century occupation on the project sites;
- Urban Design and Visual Resources – With proposed building heights ranging from 724 to 1,008 feet, we are concerned about the out-of-scale scope of the project and its potential to block critical view corridors to the East River and access of area residents to light and air;
- Natural Resources – The development would be constructed entirely within the 100-year flood plain, in a combined sewer area, and in close proximity to the East River;
- Traffic and Parking – The preliminary analysis indicates that 30 intersections in the study area will be evaluated for adverse impacts. In terms of parking, we question how the lack of proposed parking would be mollified by the 1,900 existing parking spaces in eight additional off-street parking facilities within a ½-mile study area of the project site, to which the DSOW alludes.

We are also concerned about impacts on water and sewer infrastructure; solid waste management; energy efficiency; mobile and stationary source air quality and noise during operation and construction, greenhouse gas emissions and climate change, and cumulative impacts from other developments in the area (e.g., the Extell development already under construction).

Moreover, we would expect that many adverse impacts would remain unmitigated under the current proposal and result in long-term harmful effects on the Two Bridges neighborhood.

Recommendations

We strongly oppose this proposal unless the City takes the required hard look at the likely long-term harmful effects on the Two Bridges neighborhood and generates a development plan that reflects true community input and adheres to a comprehensive plan. The City must pursue a decidedly more sustainable approach to better accommodate the new population by providing an affordable housing program that reflects the income of the area; adopting a carefully considered design that addresses climate change and resiliency for the long-term; requiring the achievement of LEED™ or equivalent certification standards for construction and operation; incorporating height and bulk measures that reduce shadow impacts on parks and open space; and including a vibrant mix of uses, especially with regard to local retail and community facilities. Finally, to ensure meaningful community engagement and accountability, we recommend that the proposal undergo a formal ULURP process.

Thank you for the opportunity to provide comments on this critically important proposal.

June 8, 2017

Written Comments to the Department of City Planning on the Draft Scope of Work for Two Bridges LSRD, CEQR No. 17DCP148M

Introduction

History of Task Force

In June 2016, local elected offices submitted a joint-letter to the Department of City Planning (DCP) requesting three separate proposals within the Two Bridges Large-Scale Residential Development (LSRD) to be processed as major modifications. The request for a major modification would subject the proposals, which would generate approximately 3,000 new residential units, to the Uniform Land Use Review Procedure (ULURP) and provide an opportunity for the local community, Community Board, Borough President and City Council to comment.

DCP determined the Two Bridges applications should proceed as minor modifications to the Large-Scale Residential Development (LSRD) and subjected the applicants to a joint Environmental Impact Statement (EIS), which featured a more robust environmental review process with four community engagement meetings (CEM) structured around EIS content chapters and led by the development teams. As part of this process, the Manhattan Borough President Gale A. Brewer and Councilmember Margaret S. Chin formed the Two Bridges EIS Task Force consisting of LSRD tenant leaders, tenant leaders from residential buildings adjacent toround the LSRD, local community organizations, Community Board 3, and elected officials as an effort to address concerns and seek feedback from the adjacent community.

The Task Force originally had five key goals:

1. Provide supplemental outreach, education, and focused discussions for impacted groups/residents;
2. Assist the Development Team's Engagement Consultant (Karp Strategies) in the development of agenda, content, and creative strategies for 4 EIS Community Engagement Meetings (CEM);
3. Identify and prioritize community needs and mitigation measures;
4. Work to ensure that the scope of the EIS reflects community priorities and concerns;
5. Work collaboratively with development teams on mitigation scenarios and other potential community initiatives.

The Task Force was formed in November 2016 and began engaging with the development teams consultant, Karp Strategies in December 2016 prior to the first CEM. After the second CEM in January 2017, when a letter was read by residents of the community and some of the Task Force members requesting a push to the proposed scoping hearing, some of the roles of the Task Force dissolved, primarily: assisting with the development and content of the CEM's and working collaboratively with the development teams/Karp Strategies.

Since then, Task Force members developed and distributed educational materials to inform the community of the proposed developments, provide an overview of the environmental review

process and to solicit feedback on community concerns and priorities by conducting a Two Bridges Neighborhood Survey¹ within the LSRD and adjacent community. From this effort, we were able to collect 422 completed surveys², analyzed by the Manhattan Borough President Brewer and Councilmember Chin's offices, which have informed our comments on the Draft Scope of Work (DSOW).

Major Concerns & Positions

Reasonable, contextual alternative

In addition to the No-Action alternative scenario, the implementation of the Chinatown Working Group (CWG) 197-a plan as designed by the community should be treated as an alternative scenario and studied in the Draft Environmental Impact Statement (DEIS). The CWG proposal creates a special district including both the Lower East Side and Chinatown, with zoning protections and development guidelines to benefit very low-income and immigrant residents. If the entire plan's implementation cannot be studied, we request that at a minimum, "Subdistrict D" of the CWG is studied as a lower-scale alternative, which includes a 350 foot height limit, a 55% on-site permanently affordable housing requirement, and more.

Comprehensive Planning: Integration with other projects & initiatives

Resiliency

The proposed developments lie within Zone 1 of New York City's Hurricane Evacuation map. The study area experienced significant flooding during Hurricane Sandy and while we understand the developers have plans to increase resiliency measures for the projects, these measures do not address additional concerns of resiliency. The EIS needs to study how a significant increase in residents will affect evacuation measures (shelter capacities, first responder capacities).

Additionally, residents with lower income rely on local affordable food and goods stores to meet not only day-to-day needs but also emergency needs. If local businesses are displaced or lose the ability to afford increased rents, residents will have a much harder time accessing essential goods during emergency situations. Therefore, the EIS needs to link the relationship between any changes in business patterns and displacements with residents' resiliency capacity.

Land Use, Zoning, Public Policy

A quarter-mile study area is inadequate for an examination of neighborhood impacts. The study area for the DEIS should be increased to at least a half-mile radius with an irregular study area, to include the portions of the neighborhood most likely to be impacted as well as adjacent areas that will receive new development, extending north to Delancey Street.³

While the DSOW is a good start in terms of an analysis of cumulative impacts, there are multiple as-of-right projects that will also add substantial neighborhood density, infrastructure capacity,

¹ See appendix A.

² See appendix B.

³ See appendix C.

and need for local services. NYCHA's recently proposed in-fill project will create a 50% affordable and 50% market-rate residential building on a parking lot at LaGuardia Houses, the Extell project adjacent to the LSRD already in construction, and the Essex Crossing mixed-use development currently under construction should also be examined in a similar and cumulative manner.

The land use analysis must also examine the impact of the proposed developments on the Lower Manhattan Coastal Resiliency Project (LMCR), and any likely rezonings, such as the Chinatown core, under discussion at DCP. The proposed projects will alter what is now an affordable residential district by introducing high numbers of market rate units into a small area and increasing median housing prices. The DEIS needs to delineate both the absolute increase in the overall number of market-rate units in the study area, and the impact of the introduction of market rate units on the proportion of overall affordable units (affordable to local AMI). The analysis should not be limited to public studies but should also include Furman Center reports, eviction data, and the Chinatown Working Group data.

The proposed projects not only do not address the needs of the community but actually hurt the existing community and the original intention of the Two Bridges Urban Renewal Area (TBURA) and the neighborhood at large. It is essential that the EIS study how the project is impacting and shifting the land use needs of the community from that of deeply affordability to that of unaffordability.

Socioeconomic Conditions

Direct Residential Displacement

It is essential that the EIS disclose specific relocation plans for the residents of the 19 currently-occupied units at 80 Rutgers Slip (10 units will be permanently taken offline and 9 units will be temporarily offline during construction) that will be affected by the Proposed Action, including how relocation costs will be addressed for those residents, the duration of time they will be relocated, where they will be housed and under what conditions, and what costs will be incurred and by whom

Indirect Residential Displacement

The study area for secondary displacement should similarly be increased to a half-mile radius and drawn to include the adjacent neighborhoods of Chinatown and the Lower East Side, up to Delancey Street and including census tracts that are predominantly Latino and Asian.

In order to accurately account for secondary displacement the DEIS needs to assess rent-regulated units and examine the impact on local residents who are losing preferential rents in subsidized housing, and their ability to find equivalently-priced housing in the vicinity. Although this is not a strict requirement under CEQR, the method currently described by the technical manual does not effectively assess indirect residential displacement as it assumes that only market rate residents are in danger of displacement, which is a fallacy in 2017 New York City.

The DEIS should include data that reflects the actual realities of displacement, including eviction and foreclosure data, building and alteration permits, demolition permits, complaints of landlord harassment, an inventory of currently regulated building stock that will soon expire, all subsidized, rent regulated and/or stabilized apartments, and inventory of local requests for Right to Counsel, and interviews with local housing groups that counsel tenants who have been subject to harassment, discrimination, and displacement. This data is available from ANHD, ProPublica, the Furman Center, and local housing groups. The DEIS should also look beyond income to race, levels of educational attainment, rent burden, overcrowding, and linguistic isolation, key factors that would provide a more accurate picture of those made vulnerable by the addition of new population with higher income.

The EIS needs to draw connections between residential and business displacement to accurately assess how the projects will truly affect affordability. The displacement of local businesses that provide essential goods to residents will contribute to making the neighborhood unaffordable in addition to increased rents.

Indirect Residential Displacement Mitigation

The LSRD and Two Bridges Urban Renewal Area (TBURA) was created to not only eliminate blight but also to create low-, moderate-, and middle-income housing. Therefore, any development should honor the original intention. The Two Bridges Neighborhood Survey found that the neighborhood's first concern and priority is still the affordability of the neighborhood and that it is not just the number of affordable units available but how deeply affordable those units are. While the proposed projects include 694 units of permanently affordable housing, the DEIS needs to clarify what AMIs are targeted. Any affordable units in the proposed projects need to reflect the AMI of the local neighborhood and include deeply affordable units (10%, 20%, 30%, 40% AMI). Additionally, the EIS should study how increasing the number of affordable units in each proposed development will impact the community.

Indirect Business Displacement

Survey respondents have also expressed that community affordability for them is low priced local grocery stores, pharmacies, school supplies, clothing, home goods, and other essential goods. The CEQR fails to draw connections between the affordability of goods provided by local businesses to the affordability and livability of the neighborhood. Therefore, the EIS needs to study how changes in affordability of business goods in the community will affect the general affordability in the neighborhood. How will increases in commercial rent affect prices of essential goods to the neighborhood? How will inflation of good prices affect secondary residential displacement?

Residents of the study area are often linguistically isolated and often rely on local businesses that specifically service the needs of these linguistically isolated populations. Any displacement of local businesses can threaten the ability of residents to access essential services and needs. Therefore, the DEIS must also assess the population served by the local businesses and how the proposed projects can potentially push out these businesses and replace them with new businesses that cater to higher earning residents' needs, even if rental rates do not change.

Indirect Residential Displacement Mitigation

Mitigations should also include discussions with the community members about businesses they are lacking, which have included: commercial banks, dry cleaner/tailor, shoe repair, family-style restaurants, and retail outlets for fresh produce.

Community Facilities and Services

Fire and Police Services

According to the DSOW, the EIS will not conduct a “detailed analysis of police and fire protection serving the project area.” However, according to CEQR, police and fire services should be studied when a “sizable new neighborhood” is introduced. The proposal is introducing 2,775 new units with completely new building forms. Fire and police services do not evaluate capacity and resources based on zoning allowance, but rather the existing neighborhood needs. The introduction of over two thousand units and heights of the buildings with dramatically shift the capacity needs and calculations of fire and police services. How will the increased densities of the buildings effect fire and police capacity? Is the local fire department equipped to serve 1,000 foot buildings?

Senior Services

The proposed developments call for an increase of 200 new seniors units. Additionally, with over 200 new senior units created in the Essex Street Crossing developments and 100 new senior units at the 30 Pike Street development, the study area will see an increase of at least 500 new units for seniors. This influx of seniors will require a thorough examination on available social services and space for senior activities. Since a large number of senior residents are linguistically isolated and require additional services, attention and needs that need to be considered in the DEIS.

With the proposed developments, the DEIS must study the following issues that will affect senior services and life quality:

- Examine the indirect displacement of small pharmacies and other health services such as clinics, acupuncture services, which provide seniors’ healthy needs with reasonable prices and are language-barrier free. Also examine impact of retail and community facility displacement due to rising rents on alternative/Eastern medical facilities, practitioners and herb stores within at least ½ mile that serve the both the general public but especially Chinese seniors – in particular those with linguistic challenges.
- Examine the indirect displacement of culture-based supermarkets and grocery stores, which are one of the important destinations for seniors, that might further discourage them to go outside and affect their both mental and physical health, and decrease the opportunities of connecting and socializing with other residents.
- Examine the capacity of public transit to adequately serve seniors as it use becomes more strained by new population.

Schools & Child Care Facilities

Currently, the CEQR does not accurately assess school service needs of the community because: it relies on outdated 2000 census data; it does not capture local enrollment, uptake, and birth trends; it does not contextualize current city projects like the Mayor's Pre-K initiative; and it does not look at the unique needs of the Two Bridges neighborhood. To better capture the community's needs for schools and child care facilities, the DEIS needs to:

1. Analyze the cumulative impacts of three additional large-scale projects: the Extell Towers, the Essex Street Crossing development, and the NYCHA LaGuardia NextGEN development
2. Analyze local school enrollment trends
3. Analyze accessibility for individuals with disabilities
4. Analyze the ability of present facilities to accommodate growing class sizes
5. Analyze inadequacies of facilities: such as auditoriums, cafeterias, libraries, gymnasiums
6. Analyze co-located spaces and future charter co-locations
7. Analyze insufficient space to serve English as a Second Language (ESL) Learners
8. Analyze child care needs
9. Analyze funding opportunities to support demonstrated needs and to promote education equity

The analysis on child-care facilities should also include data on current waitlists for these facilities and if any new facilities are under construction/planning. Additionally, the DEIS should identify where facilities are located and the number of new slots anticipated to be needed as a result of the projects in addition to projected local enrollment, uptake, and birth trends. Affordability of any new child care resources should be considered as it impacts the availability of this essential resource for low-income residents (particularly in nearby NYCHA buildings).

Transportation

The conditions in Two Bridges area with regard to transportation, traffic, transit, pedestrian, pedestrian/vehicle safety, and parking are already rife with hazards that are worsened from a lack of enforcement and an absence of comprehensive local transit planning. The proposed developments will worsen these conditions during and after construction. Therefore, it is crucial that the DEIS thoroughly examine the realities of traffic, transport, pedestrian safety, and parking conditions and mitigations are put into place.

Traffic

The DSOW specifies that the traffic analysis will be performed for the weekday AM, Midday, and PM peak periods at 30 traffic intersections. Yet, many hazardous traffic conditions in the neighborhood occur on weekends, emanating from the foot and vehicle traffic associated with Basketball City and the cruise boat launch. Tour buses drop off passengers at the intersection of South and Montgomery streets. Traffic queues up behind the tour buses, or worse, goes around the tour buses and into the pathway of cruise ship and Basketball City patrons attempting to cross South Street to get to the waterfront. In addition, construction vehicles servicing the Extell site

and all future developments in the area will continue to affect weekend traffic as well. It is critical that traffic be analyzed during several points throughout the weekend.

Transit

Similarly, transit impacts should also be examined on weekends when there are heavy volumes of non-resident users traveling to Basketball City and the cruise ship dock. Additionally, in 2021 the MTA is proposing to take the F train off-line (without a definitive timeline how long repairs will take) to repair damages caused by Hurricane Sandy; coincidentally, this is around the same year when the trio of residential skyscrapers will bring an influx of resident commuters. How will the MTA repairs affect transportation patterns? What are the alternative modes of transportation?

In the Two Bridges Neighborhood Survey, residents have identified the impacts of not having an elevator at the F Train station. The train station is not ADA accessible which makes it extremely difficult to access for senior residents and people with disabilities, which will be exacerbated with the influx of new senior units. The DEIS should also consider adding a new F-train entrance at the intersection of Madison and Rutgers. The sole existing entrance is narrow, poorly designed, and the nearby curb is crumbling, leading to unsafe and congested conditions. Additionally during morning rush hour, patrons line the sidewalk awaiting service at a local bagel store and block the subway entrance, and bus riders line the other side of the sidewalk as they wait for the bus.

With the scheduled F Train construction and the inaccessibility of the subway station, many residents rely and use the bus as their primary mode of transportation. Therefore it is essential that the DEIS also study bus ridership patterns, despite the fact that the DSOW mistakenly concluded that such a study is unnecessary.

Pedestrians

There are many areas of the study area that have posed serious pedestrian safety risks. Below are some areas that need to be closely examined:

- ADA requirements of all the sidewalks
- Crosswalks at Montgomery and Water Street
- FDR (North/Southbound entrances) and South Street
- Traffic and pedestrian patterns caused by city tour bus drops off on the corner of Montgomery/South St.
- Traffic and pedestrian patterns caused by Basketball City events that draws hundreds of attendees (at times private buses are used to shuttle the people for private events - take up all South St parking spots)
- Traffic and pedestrian patterns caused by Pier 36 boat tour events
- Need to add reflective road poles on South Street to distinctly define the edge of the curb and traffic lane - safety concern for bicyclists and pedestrians (it also aids anyone who is visually impaired)
- By Pier 35, there are about 3 active parking lots for Sanitation and EMT vehicles - most people don't know it's an active driveway since it's not clearly marked/defined
- Rutgers and Cherry Street crosswalks don't align

- Examine impacts of vehicles turning into and out of the FDNY and DOS facilities.
- Two-way bike lanes on one-way Clinton Street have proven dangerous for pedestrians accustomed to only looking one way before crossing. Consider improved signage or one-way bike lanes, and add bicycle flashing light signals.
- Study the removal of the yellow fire chain to create a more open and inviting pathway to the waterfront.
- Commercial parking overnight for C district

Parking

According to the DSOW, the analysis will only examine on-site parking. However, since the proposed projects will introduce a significant influx of high-income residents without adding any additional on-site parking, the DEIS should also perform an on-street parking analysis. This analysis needs to include a detailed map indicating the key parking regulations on block faces within convenient walking distance of the project side.

Appendix A
Two Bridges Neighborhood Survey

**This survey was developed by your elected officials and tenant leaders -
to learn your needs and wants for
YOUR TWO BRIDGES COMMUNITY!**

There are 3 residential developments proposed for the Two Bridges Waterfront. We want your input on community priorities for the Environmental Review (EIS) process. For more information on EIS, see your tenant leader.

The survey should take about 10-15 minutes and can be returned to your tenant leader, or emailed to ebaptiste@manhattanbp.nyc.gov and rearley@council.nyc.gov.

1) Please select all that apply to you:

- I live here
For how long?
- Less than 5 years 5-10 years 11-19 years 20 years or more
- I am a property owner here
 I am a student here
 I am an advocate/organizer/volunteer here
 I used to live here
 A close family member lives here
 I work here
 I own a business here
 Other _____

2) If you live in Two Bridges along the waterfront, what development do you live in?

- 80 Rutgers Slip: Two Bridges Senior Apartments Two Bridges Townhouses
 82 Rutgers Slip: Two Bridges Tower 286 South Street: Two Bridges NYCHA
 275 South Street: Lands End I (aka 257 Clinton) Area NYCHA resident
 265-275 Cherry: Lands End II Other: _____

3) Have you attended a meeting about the joint Environmental Impact Study (EIS) of the proposed developments along the Two Bridges waterfront?

- Yes No

4) What is the MOST IMPORTANT thing about the Two Bridges neighborhood to you?

5) What are your TOP FIVE CONCERNS about new developments along the waterfront? Please rank them 1-5, #1 being your biggest concern.

- | | |
|---|---|
| <input type="checkbox"/> Affordability of neighborhood (rising rents, displacement or secondary displacement) | <input type="checkbox"/> Public Health (ex. exposure to contaminants) |
| <input type="checkbox"/> Neighborhood character and culture | <input type="checkbox"/> Climate Change & Waterfront Resiliency |
| <input type="checkbox"/> Open and green space (ex. parks, playgrounds) | <input type="checkbox"/> Noise (ex. extreme traffic changes) |
| <input type="checkbox"/> Overcrowding Schools/Day Care | <input type="checkbox"/> Air Quality (ex. Air pollutants) |
| <input type="checkbox"/> Historic resources/architecture | <input type="checkbox"/> Hazardous Materials |
| <input type="checkbox"/> Height of building/shadows/views | <input type="checkbox"/> Local businesses being displaced |
| <input type="checkbox"/> Infrastructure (ex. water, sewer, sanitation) | <input type="checkbox"/> Influx of new residents |
| <input type="checkbox"/> Transportation (ex. subway, Busses, Parking) | <input type="checkbox"/> Waterfront access |
| <input type="checkbox"/> Impact of construction (ex. disruptions due to construction, timing of projects, dust & noise) | <input type="checkbox"/> Other _____ |

Part 2 of Survey: Specific Needs

- 1) What is **MISSING** for you in your community? **Please choose FIVE, ranking them 1-5 with #1 as your most preferred.**
- Schools, educational resources, after-school and youth programs
 - Affordable retail stores (clothing, pharmacy, etc.)
 - Affordable, healthy food (grocery stores, farmers markets)
 - Affordable, quality housing for local families
 - Building maintenance
 - Better transportation & other alternatives
 - Police & other public safety measures
 - Senior activities, educational programs & services
 - Accessible resources for people with disabilities (shuttle buses, F train elevator)
 - Open and green space
 - Jobs & Jobs training
 - Cultural spaces & activities
 - Community participation
 - Other _____
- 2) What type of **business & job growth** do you want to see in the community? **Please choose FIVE, ranking them 1-5 with #1 as your most preferred.**
- Construction jobs on any new developments
 - Retail and security jobs at local businesses
 - Small business incubators for local residents
 - Training for local residents for tech jobs (coding, web design, etc.)
 - Art galleries supporting local artists
 - Other _____
- 3) What do you believe is needed to keep the neighborhood **affordable** for your community? **Please choose FIVE, ranking them 1-5 with #1 as your biggest concern.** **The Department of Housing and Urban Development determines the Area Median Income (AMI) –combined household income– which is used as a guideline for affordable housing developments in NYC.*
- Price of affordable housing (at 40% AMI [\$36,240 for a family of 4] and below)
 - Amount of affordable housing (more units available at various AMI levels)
 - Small business planning support and improvements for local stores
 - Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)
 - Low prices for local retail (clothes, home goods, gas, etc.)
 - Affordable parking spaces for locals
 - Child day care, senior center, etc.
 - Other _____
- 4) What kinds of **community facilities** do you most want to see in the community? **Please choose FIVE, ranking them 1-5 with #1 as your biggest concern.**
- Senior resource center
 - Affordable sports/exercise facility
 - Cultural spaces
 - Community Meeting Space
 - Health center
 - Job training center
 - Other _____
- 5) What **transportation** needs are most important to you in the community? **Please choose FIVE, ranking them 1-5 with #1 as your most preferred.**
- Affordable parking spaces for local residents
 - More frequent subway and bus service
 - Shuttle for seniors and people with disabilities to get to/from MTA stops
 - Elevator or additional escalator service at East Broadway subway stop
 - Other _____
- 6) What kinds of **open space** would you most like to see in your community? **Please choose FIVE, ranking them 1-5 with #1 as your most preferred.**
- Recreational access to the waterfront
 - Green space / park space
 - Community garden
 - Playground
 - Outdoor benches and tables
 - Space for organized sports: basketball, tennis, soccer, handball courts
 - Other _____

此份調查旨在幫助您的民選官員與租戶代表進一步了解
雙橋社區居民對
雙橋社區的各種期許與需求

目前有三項住宅開發項目被提議建造於雙橋沿岸地區內。我們希望您能夠在環境影響審查 (Environmental Review ; EIS) 過程中就社區內應當優先考慮的事項提出意見。如希望進一步了解EIS, 請與您的租戶代表討論。

此份調查卷大約需要 10-15分鐘來完成, 可以遞交給您的租戶代表, 也可以以電子郵件形式送交至電子郵箱ebaptiste@manhattanbp.nyc.gov 與 rearley@council.nyc.gov。

1) 請選擇所有適用於您的選項：

- 我住在這裡
- 有多久了?
 - 少於5年
 - 5-10年
 - 11-19年
 - 20年或更久
- 我在這裡擁有自己的房產
- 我是住在這裡的學生
- 我是這裡的社區代言人/組織人/義工
- 我曾經住在這裡
- 我有親戚住在這裡
- 我在這裡工作
- 我在這裡擁有企業
- 其他 _____

2) 如果您住在雙橋區域內的沿岸地區, 請問您住在哪一個開發社區內?

- 80 羅格斯街: 雙橋區耆老公寓
- 82 羅格斯街: 雙橋區大樓
- 275 South Street: Lands End I大樓 (亦稱為 257 柯林頓街)
- 265-275 櫻桃街: Lands End II大樓
- Two Bridges Townhouses
- 286 南街: 雙橋區紐約市房屋局 (NYCHA) 住宅
- 紐約市房屋局 (NYCHA) 住宅住戶
- 其他: _____

3) 您是否出席參加過關於雙橋沿岸區域內所提議之開發項目的合作環境影響研究的會議?

- 是
- 否

4) 請問雙橋鄰里內對您來說最重要的是什麼?

5) 您對沿岸新開發項目最為關懷的五項事件是什麼? 請選擇五個選項, 按選擇優先順序填入數目號碼1-5, 以#1 為您最為關懷的事項。

- 鄰里的可負擔性 (租金增漲、迫遷或是被帶迫遷)
- 鄰里特色和文化
- 開放和綠化空間 (例如公園、遊樂園等)
- 學校/托兒所過度擁擠
- 歷史資源/建築
- 建築物高度/陰影/視覺資源
- 基本設施 (例如上下水道、衛生等)
- 交通 (例如地鐵、巴士、停車等)
- 建築工程本身的影響 (例如建築工程造成打擾、項目建築時間、灰塵與噪音等)
- 公眾保健衛生問題 (例如被曝露於污染物等)
- 氣候變化與沿岸地區地質的耐久性
- 噪音 (例如交通量變化等)
- 空氣質量 (例如空氣污染物等)
- 危險物質
- 本地企業被迫遷
- 湧入大批新住民
- 是否能夠繼續利用沿岸地區
- 其他 _____

調查問卷第2部分：特定需求

- 1) 您的社區缺乏的是什麼？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為您最優先的選擇。
- | | |
|------------------------|---------------------------|
| - 學校、教育資源、課後與青少年活動等 | - 耆老活動、教育計畫與服務 |
| - 可負擔的零售商店（服裝、藥店等） | - 傷殘人士可用的資源（穿梭巴士、地鐵F車電梯等） |
| - 可負擔而健康的食物（食物店、農夫市場等） | - 開放與綠化空間 |
| - 為當地家庭提供的可負擔住宅 | - 工作與工作培訓 |
| - 建築物維修 | - 文化空間與活動 |
| - 更好的交通工具與更多的選擇 | - 社區人士參入 |
| - 警察與公眾安全措施 | - 其他_____ |

- 2) 您希望在社區內見到什麼種類的企業與工作機會增長？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為最優先的選擇。
- | | |
|-------------------------------|---------------|
| - 任何新開發項目內的建築工 | - 支持當地藝術家的藝術廊 |
| - 當地企業的零售與保安工作 | - 其他_____ |
| - 為當地住民所提供的小型企業孵化器 | |
| - 為當地住民提供科技工作培訓（編寫電腦程序、網站設計等） | |

- 3) 請問您認為要保持鄰里的可負擔性，在您的社區內所需要的是什麼？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為您最為關心的事項。*美國住房與城市開發部決定的地區中收入（Area Median Income；簡稱AMI）-家庭收入總數-而這個數目在紐約市可負擔住宅開發項目內做為準則。
- | | |
|---|---------------------------|
| - 可負擔住宅的價格（在AMI的40%，對4人成員的家庭而言就是\$36,240） | - 低廉的當地零售品價格（服裝、家用物品、汽油等） |
| - 可負擔住宅的數量（提供更多針對各個AMI層次的住宅單位） | - 為當地住民提供可負擔的停車位 |
| - 小型企業策劃支持以及為當地商店所提供的改進設施 | - 兒童托兒服務、耆老中心等 |
| - 低廉的當地日用品價格（食品店、藥店、學校文具等） | - 其他_____ |

您最希望在社區內見到哪些社區設施？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為您最為關心的事項。

- | | |
|---------------|-----------|
| - 耆老資源中心 | - 保健中心 |
| - 可負擔的體育/運動設施 | - 就業培訓中心 |
| - 文化空間 | - 其他_____ |
| - 社區會議空間 | |

- 4) 在社區內，哪些交通需求對您最重要？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為最優先的選擇。
- | | |
|---|-----------|
| - 為當地住民提供可負擔的停車空間 | - 其他_____ |
| - 更為頻繁的公車與地鐵服務 | |
| - 幫助耆老或傷殘人士往來於MTA車站的穿梭巴士 | |
| - 在東百老匯（East Broadway）地鐵站提供電梯或更多的電動扶梯服務 | |

- 5) 您希望在您的社區內見到哪些種類的開放空間？請選擇五個選項，按選擇優先順序填入數目號碼1-5，以#1為最優先的選擇。
- | | |
|---------------|---------------------------|
| - 沿岸地區可供予遊樂用途 | - 戶外桌椅 |
| - 綠化空間/公園空間 | - 用於團體運動的空間：籃球、網球、足球、手球場等 |
| - 社區園圃 | - 其他_____ |
| - 兒童遊樂場 | |

La presente encuesta fue desarrollada por sus funcionarios electos y líderes de los inquilinos con la finalidad de conocer sus necesidades y deseos para
SU COMUNIDAD DE TWO BRIDGES.

Existen 3 propuestas de desarrollos residenciales en la zona costera de Two Bridges. Queremos conocer su opinión sobre las prioridades de la comunidad para el proceso de revisión ambiental (EIS). Para obtener más información sobre la EIS, consulte con su líder de los inquilinos.

La encuesta debería tomarle unos 10 a 15 minutos y puede ser devuelta a su líder de los inquilinos, o enviada por correo electrónico a ebaptiste@manhattanbp.nyc.gov y rearley@council.nyc.gov.

1) Seleccione todas las opciones que apliquen para usted:

- Yo vivo aquí
 ¿Durante cuánto tiempo?
 Menos de 5 años 5 a 10 años 11 a 19 años 20 años o más
- Soy dueño de un inmueble aquí
 Estudio aquí
 Soy un defensor/organizador/voluntario aquí
 Solía vivir aquí
 Un pariente cercano vive aquí
 Trabajo aquí
 Soy dueño de un negocio aquí
 Otros _____

2) Si vive en la zona costera de Two Bridges, ¿en qué urbanización vive?

- 80 Rutgers Slip: Apartamentos para adultos mayores de Two Bridges Viviendas unifamiliares de Two Bridges
 82 Rutgers Slip: Two Bridges Tower 286 South Street: NYCHA de Two Bridges
 275 South Street: Lands End I (también conocido como 257 Clinton) Área de residentes de la NYCHA
 265-275 Cherry: Lands End II Otros: _____

3) ¿Ha asistido a una reunión sobre el Estudio de Impacto Ambiental (EIS) conjunto de los desarrollos urbanos propuestos a lo largo de la línea de costera de Two Bridges?

- Sí No

4) ¿Para usted cuál es la cosa **MÁS IMPORTANTE** sobre la zona de Two Bridges?

5) ¿Cuáles son sus **CINCO PRINCIPALES PREOCUPACIONES** sobre los nuevos desarrollos urbanos a lo largo de la zona costera? Clasifíquelas del 1 al 5, siendo la n°. 1 su mayor preocupación.

- | | |
|---|---|
| <input type="checkbox"/> Asequibilidad del vecindario (incrementos en los alquileres, desalojos o desplazamientos secundarios) | <input type="checkbox"/> Salud Pública (por ej. exposición a contaminantes) |
| <input type="checkbox"/> Carácter y la cultura del vecindario | <input type="checkbox"/> Cambio climático y la resiliencia de la zona costera |
| <input type="checkbox"/> Espacios abiertos y áreas verdes (por ej. parques, patios de recreo) | <input type="checkbox"/> Ruido (por ej. cambios extremos en el tráfico) |
| <input type="checkbox"/> Hacinamiento de escuelas/guarderías | <input type="checkbox"/> Calidad del aire (por ej. contaminantes del aire) |
| <input type="checkbox"/> Recursos históricos/arquitectura | <input type="checkbox"/> Materiales peligrosos |
| <input type="checkbox"/> Altura de los edificios/sombras/vistas | <input type="checkbox"/> Empresas locales desplazadas |
| <input type="checkbox"/> Infraestructura (por ej. agua, alcantarillado, saneamiento) | <input type="checkbox"/> Afluencia de nuevos residentes |
| <input type="checkbox"/> Transporte (por ej. metro, autobuses, estacionamientos) | <input type="checkbox"/> Acceso a la zona costera |
| <input type="checkbox"/> Impacto de la construcción (por ej. interrupciones debido a la construcción, horarios de los proyectos, polvo y ruido) | <input type="checkbox"/> Otros _____ |

Párte 2 de la encuesta: Necesidades específicas

- 1) ¿Para usted qué está **FALTANDO** en su comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su primera elección.**
- | | |
|--|---|
| <input type="checkbox"/> Escuelas, recursos educativos, programas extracurriculares y juveniles | <input type="checkbox"/> Actividades programas educativos y servicios para adultos mayores |
| <input type="checkbox"/> Tiendas minoristas asequibles (ropa, farmacia, etc.) | <input type="checkbox"/> Recursos accesibles para personas con discapacidades (autobuses de tránsito, elevadores de tren) |
| <input type="checkbox"/> Alimentos asequibles y saludables (supermercados, mercados de agricultores) | <input type="checkbox"/> Espacios abiertos y áreas verdes |
| <input type="checkbox"/> Viviendas asequibles de calidad para las familias locales | <input type="checkbox"/> Empleos y capacitación laboral |
| <input type="checkbox"/> Mantenimiento de edificios | <input type="checkbox"/> Espacios y actividades culturales |
| <input type="checkbox"/> Mejor transporte y otras alternativas | <input type="checkbox"/> Participación comunitaria |
| <input type="checkbox"/> Policía y otras medidas de seguridad pública | <input type="checkbox"/> Otros _____ |
- 2) ¿Qué tipo de **crecimiento empresarial y de empleos** le gustaría ver en la comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su primera elección.**
- | | |
|--|---|
| <input type="checkbox"/> Empleos de construcción para los nuevos desarrollos | <input type="checkbox"/> Galerías de arte que apoyan a los artistas locales |
| <input type="checkbox"/> Empleos minoristas y de seguridad en negocios locales | <input type="checkbox"/> Otros _____ |
| <input type="checkbox"/> Incubadoras de pequeños negocios para residentes locales | |
| <input type="checkbox"/> Capacitación en empleos de tecnología para residentes locales (codificación, diseño de páginas web, etc.) | |
- 3) ¿Qué cree que se necesita para mantener el vecindario **asequible** para su comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su mayor preocupación.** *El Departamento de Vivienda y Desarrollo Urbano del Gobierno Federal determina el Ingreso medio del área (AMI, por sus siglas en Inglés), es decir los ingresos combinados de los hogares, el cual se utiliza como guía para los proyectos de viviendas asequibles en Nueva York.
- | | |
|--|---|
| <input type="checkbox"/> Precios de viviendas asequibles (a un 40% del AMI [\$ 36,240 para una familia de 4] y menos) | <input type="checkbox"/> Precios bajos en los minoristas locales (ropa, artículos para el hogar, gas, etc.) |
| <input type="checkbox"/> Cantidad de viviendas asequibles (más unidades disponibles para distintos niveles de AMI) | <input type="checkbox"/> Espacios de estacionamiento asequibles para los habitantes locales |
| <input type="checkbox"/> Apoyo para la planificación de las pequeñas empresas y mejoras para las tiendas locales | <input type="checkbox"/> Guarderías infantiles, centros para personas de la tercera edad, etc. |
| <input type="checkbox"/> Precios bajos para las necesidades diarias locales (supermercados, farmacias, material escolar, etc.) | <input type="checkbox"/> Otros _____ |
- 4) ¿Qué tipos de **instalaciones comunales** le gustaría ver más en la comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su mayor preocupación.**
- | | |
|--|---|
| <input type="checkbox"/> Centro de recursos para personas de la tercera edad | <input type="checkbox"/> Centro de salud |
| <input type="checkbox"/> Instalación deportiva/gimnasio asequible | <input type="checkbox"/> Centro de capacitación laboral |
| <input type="checkbox"/> Espacios culturales | <input type="checkbox"/> Otros _____ |
| <input type="checkbox"/> Espacio de reunión de la comunidad | |
- 5) ¿Qué necesidades de **transporte** son más importantes para usted dentro de la comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su primera elección.**
- | | |
|--|--------------------------------------|
| <input type="checkbox"/> Espacios de estacionamiento asequibles para residentes locales | <input type="checkbox"/> Otros _____ |
| <input type="checkbox"/> Servicios de metro y autobuses más frecuentes | |
| <input type="checkbox"/> Autobuses de tránsito para ancianos y personas con discapacidad para llegar/salir desde las paradas del MTA | |
| <input type="checkbox"/> Elevador o servicio adicional de escaleras mecánicas en la parada del metro de East Broadway | |
- 6) ¿Qué tipos de **espacios abiertos** son los que más le gustaría ver en su comunidad? **Seleccione CINCO, clasifíquelas del 1 al 5, siendo la n°. 1 su primera elección.**
- | | |
|--|--|
| <input type="checkbox"/> Acceso recreativo a la zona costera | <input type="checkbox"/> Bancas y mesas al aire libre |
| <input type="checkbox"/> Espacios verdes / parques | <input type="checkbox"/> Espacios para deportes organizados: canchas de baloncesto, tenis, soccer, balonmano |
| <input type="checkbox"/> Huertos comunitarios | <input type="checkbox"/> Otros _____ |
| <input type="checkbox"/> Patios de recreo | |

Appendix B
Two Bridges Neighborhood Survey Results

EXECUTIVE SUMMARY ON TWO BRIDGES TASK FORCE NEIGHBORHOOD SURVEY METHODOLOGY AND FINDINGS

Introduction:

On June 22, 2016, Councilmember Margaret Chin and Manhattan Borough President Gale Brewer were joined by their colleagues representing the Two Bridges Waterfront in a letter to former Department of City Planning (DCP) Director Carl Weisbrod. The letter formally requested that proposed minor-modifications to the Large Scale Residential Plan be considered by the department as major modifications triggering the city full public review process (ULURP). Full ULURP review would allow for significant community input and the ability to dramatically shape any proposed future development in the predominantly medium density, deeply affordable neighborhood.

Director Weisbrod responded to this request on August 11, 2016, informing elected officials and the community of the department's determination that the proposed projects did not warrant full public review and would proceed through the minor-modification process at the City Planning Commission. Additionally, the department announced that the projects would need to undergo full Environmental Review per the City Environmental Quality Review law (CEQR) and would be required to prepare an Environmental Impact Statement (EIS).

DCP also announced that the development teams with proposals in the LSRD would commit to additional efforts to engage with the public in an "EIS plus" process.

Ongoing efforts by local resident leaders to galvanize into a coalition to significantly impact any proposed development eventually led to the formation of a community task force. Composed of resident leaders and a few key local organizations, this task force proposed to act as a conduit for community voices, to impact the proposed additional engagement, and to advocate for community priorities and preferences during discussions around the EIS and beyond.

The TF designed a community survey with several goals in mind including deepening engagement with and understanding of the EIS process, identify and measure community concerns and priorities, and take a first look at preferences in key issue areas. Questions sought to capture a respondent's relationship to the area, level of prior engagement with the development proposals, concerns relating to sections in the Environmental Review, and issues previously identified as priorities in community discussions. This summary reflects the significant results of that survey effort, with data tables appended. This document is intended to be a useful tool for local residents, community organizations, city-wide advocacy groups, elected officials, and impacted agencies for public testimony, advocacy, and ongoing discussions informed by community-based planning in the Two Bridges neighborhood.

Method:

- Two Bridges Community Task Force wished to develop a survey to achieve several goals:
 - Help resident leaders gather information and discuss proposed developments and process with their neighbors.
 - Help elected offices & TF as a whole to develop community drive platform for advocacy during EIS process and beyond
 - Use concrete data to support scoping and other public comments
- Using preliminary data from Karp Strategies twobridgeseis.com regarding the frequency and number of questions and comments received during Community Engagement Meetings 1 & 2, a survey was designed to capture data about the community's greatest concerns and priorities with regard to the proposed developments in the Two Bridges Large Scale Plan.
- The survey was designed in three parts:
 - Information about respondents: Who are they, what is their relationship to the Two Bridges neighborhood? If they are residents, how long have they lived here and in which developments? Have they engaged in any part of the process to date?
 - Information about respondents concerns and priorities with regard to the proposals: Two questions were designed to capture data roughly corresponding to the 18 study areas of the CEQR manual.

- Information that dives more deeply into community preferences around specific issues already identified as being of great concern. This data was extrapolated from the results of CEM 1 and 2 and revealed a majority of concern in five areas – Business & job growth; affordability; community facilities; transportation needs; and open space.
- The survey was translated into Chinese and Spanish, in order to reach the majority multi-lingual and/or limited English proficiency households in the neighborhood.
- The survey was distributed in a variety of forums during the months of March and April:
 - Resident leaders worked with their specific building populations via door to door canvassing, tabling, and peer to peer discussion
 - Elected officials and task force members conducted survey efforts at a selection of tenant association & special meetings.
- Total of 422 surveys collected in all three languages.
- Data was entered and coded during April – May. Due to inconsistent recording of scale values, all data points coded as value of '1' to indicate interest/concern/priority.
- Analysis of data has been tabulated based on a variety of population and geographic characteristics:
 - Overall (*Overall*)
 - Within/outside of the LSRD
 - By specific development (*Or across developments*) (*Or when comparing individual developments*)

Analysis

Respondents are overwhelmingly long -time residents:

- A total of 320 (76%) respondents identified as living in the Two Bridges neighborhood.
- Of these, 236 (74%) have lived in Two Bridges for 20 years or more.
- 307 (73%) of all respondents live within the LSRD

Prior Engagement:

- The survey effort reached 218 people, a total of 52% of all respondents, who had not otherwise engaged with the proposals, or the EIS process.
- Generally it would appear that respondents living within the LSRD have slightly higher rates of prior engagement than those outside, with 50% compared to 27% of respondents saying they have attended some meeting about the projects or process, respectively.

Priorities: Concerns about Development

- The top five OVERALL PRIORITIES (Table 7):
 1. Affordability of the neighborhood
 2. Transportation
 3. Impact of Construction
 4. Height of Buildings/Shadows/Impacts to views
 5. Air Quality
- Whether the data is analyzed in terms of overall respondents, differences between LSRD and neighbors, or by individual developments, the affordability of neighborhood (rising rents, displacement, secondary) is the top concern
- Public Health and Neighborhood Culture consistently rank in the top 3 concerns across developments within and outside of the LSRD (Table 26)
- Overcrowding and schools also often comes up as a top concern across developments (Table 26)

Priorities: What is Missing From The Neighborhood

The top five OVERALL things that are missing (Table 8):

1. Affordable, healthy food
2. Police and Other Safety measures

3. Affordable, quality housing
 4. Better transportation & alternatives
 5. Affordable retail
- Affordable and better transit consistently rank in the top three across all developments (Table 27)
 - Open and green space, senior activities, ADA access, and cultural spaces often rank in the top three.
 - Cultural spaces appear to be more of a priority for those within the LSRD

Preferences:

- **Business & Job Growth:**
- *Overall*, respondents value long term stability with retail and security & and training for local residents. (Table 9)
- Training for local resident, small business incubators and construction jobs in any and all new developments *rank across developments* (Table 28)

Affordability:

- *Overall*, respondents value low cost goods and housing (Table 10)
- Low cost affordable housing is consistently **ranked a higher priority** than more total units of affordable housing *across developments*. (Table 29)
- Additionally, low cost local retail and food remain priorities. (Table 29)

Community Facilities:

- Affordable sports/exercise facilities & senior resource centers are top priorities. (Table 11)
- Community meeting space is a slightly higher priority for *those outside of the LSRD*. (Table 21)

Transportation needs:

- *Overall*, elevator access at East Broadway F train, affordable parking, and connecting seniors and people with disabilities to the MTA are each top priorities. (Table 12)
- Elevator access at East Broadway is a higher priority for *those within the LSRD*. (Table 22, Table 31)

Open Space:

- Green/Open space and recreational waterfront access are crucial. (Table 12.1)
- Green space is a higher priority *outside of the LSRD*, but only slightly. (Table 32)

Tables:

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33. Table 32: Priorities: What kinds of open space would you most like to see in your community?

TABLES BY OVERAL RESPONSE

Table 1: Surveys Completed By Language:		
	% Response	Total Responses
ALL		422
English	65%	262
Chinese	34%	142
Spanish	4%	18

Table 2: Respondent Self-identifies as Resident of Two Bridges Neighborhood		
	% Response	Total Responses
Total Residents	76%	320
For Less than Five Years	11%	34
1-10 Years	15%	47
11-20 Years	26%	83
20 Years Or More	74%	236
*% calculated based on 320 self-identified residents		

TABLES BY OVERAL RESPONSE

Table 3: Respondent Self-identifies as Other Stakeholder in Two Bridges

	% Response	Total Responses
I am a property Owner here	6%	27
I am a Student Here	4%	18
I am an	4%	17
I used to live here	5%	19
A close family member lives here	7%	31
I work here	4%	18
I own a business here	0%	2
Other	1%	5

Table 4: Respondent Self-identified Resident Location by Geography

	% Response	Total Responses
Within LSRD	73%	307
Outside or Not Identified	27%	115

TABLES BY OVERAL RESPONSE

Table 5: Respondent Self-identified Resident Location By Developments		
	% Response	Total Responses
80 Rutgers Slip: Two Bridges Senior Apartments	13%	54
82 Rutgers Slip: Two Bridges tower	14%	59
Lands End I	9%	39
261-271 South Street: Lands End II	25%	107
Two Bridges Townhouses	5%	23
286 South Street: Two Bridges NYCHA	6%	25
Area NYCHA Resident	10%	41
Other	13%	53

Table 6: Overall Respondent Attendance of CEM or Other Meetings*			
	% Responses to THIS Question (403)	% Total Respondents to Survey (422)	Total Responses
Yes	46%	44%	185
No	54%	52%	218

* Survey did not specify, responses reasonably could include tenant & other

TABLES BY OVERAL RESPONSE

Table 7: Priorities: Concerns About Proposed Development On Waterfront (In Ranked Order)

	% Total Respondent	Total Responses	Rank Order
Affordability of neighborhood (rising rents, displacement or secondary displacement)	68%	285	1
Transportation (ex. subway, Busses, Parking)	55%	232	2
Impact of construction (ex. disruptions due to construction, timing of projects, dust & noise)	50%	209	3
Height of building/shadows/views	47%	197	4
Air Quality (ex. Air pollutants)	43%	180	5
Noise (ex. extreme traffic changes)	41%	174	6
Open and green space (ex. parks, playgrounds)	38%	159	7
Public Health (ex. exposure to contaminants)	36%	151	8
Neighborhood character and culture	30%	125	9
Infrastructure (ex. water, sewer, sanitation)	27%	116	10
Influx of new residents	27%	115	11
Overcrowding Schools/Day Care	23%	99	12
Local businesses being displaced	19%	80	13
Climate Change & Waterfront Resiliency	17%	72	14
Waterfront access	15%	64	15
Hazardous Materials	15%	62	16
Historic resources/architecture	10%	43	17
Other	3%	13	18

TABLES BY OVERALL RESPONSE

Table 8: Priorities: What is Missing for you in your community? (In Ranked Order)			
	% Total Respondent	Total Responses	Rank Order
Affordable, healthy food (grocery stores, farmers markets)	66%	280	1
Police & other public safety measures	48%	202	2
Affordable, quality housing for local families	47%	200	3
Better transportation & other alternatives	46%	194	4
Affordable retail stores (clothing, pharmacy, etc.)	41%	172	5
Open and green space	37%	157	6
Senior activities, educational programs & services	36%	152	7
Accessible resources for people with disabilities (shuttle buses, F train elevator)	36%	150	8
Schools, educational resources, after-school and youth programs	32%	135	9
Cultural spaces & activities	24%	101	10
Building maintenance	20%	86	11
Community participation	17%	72	12
Jobs & Jobs training	16%	69	13
Other	4%	17	14

TABLES BY OVERAL RESPONSE

Table 9: Priorities: What type of business & job growth do you want to see in the community?			
	% Total Respondent	Total Responses	Rank Order
Retail and security jobs at local businesses	67%	284	1
Training for local residents for tech jobs (coding, web design, etc.)	67%	284	2
Small business incubators for local residents	64%	272	3
Construction jobs on any new developments	51%	215	4
Art galleries supporting local artists	45%	191	5
Other _____	10%	41	6

TABLES BY OVERAL RESPONSE

Table 10: Priorities: What do you believe is needed to keep the neighborhood affordable for your community?			
	% Total Respondent	Total Responses	Rank Order
Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)	78%	328	1
Low prices for local retail (clothes, home goods, gas, etc.)	63%	264	2
Amount of affordable housing (more units available at various AMI levels)	62%	263	3
Price of affordable housing (at 10% AMI [\$16,210 for a family of 1] and below)	59%	251	4
Affordable parking spaces for locals	54%	229	5
Child day care, senior center, etc	50%	211	6
Small business planning support and improvements for local stores	37%	155	7
Other _____	3%	11	8

TABLES BY OVERAL RESPONSE

Table 10: Priorities: What do you believe is needed to keep the neighborhood affordable for your community?			
	% Total Respondent	Total Responses	Rank Order
Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)	78%	328	1
Low prices for local retail (clothes, home goods, gas, etc.)	63%	264	2
Amount of affordable housing (more units available at various AMI levels)	62%	263	3
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Affordable parking spaces for locals	54%	229	5
Child day care, senior center, etc	50%	211	6
Small business planning support and improvements for local stores	37%	155	7
Other _____	3%	11	8

TABLES BY OVERAL RESPONSE

Table 11: Priorities: What kinds of community facilities do you most want to see in the community?

	% Total Respondent	Total Responses	Rank Order
Affordable sports/exercise facility	72%	304	1
Senior resource center	71%	298	2
Health center	70%	297	3
Cultural spaces	60%	254	4
Community Meeting Space	56%	236	5
Job training center	50%	213	6
Other _____	4%	15	7

TABLES BY OVERAL RESPONSE TABLES BY OVERAL RESPONSE

Table 12: Priorities: What transportation needs are most important to you in the community?			
	% Total Respondent	Total Responses	Rank Order
Elevator or additional escalator service at East Broadway subway stop	81%	340	1
Affordable parking spaces for local residents	75%	318	2
More frequent subway and bus service	74%	311	3
Shuttle for seniors and people with disabilities to get to/from MTA stops	73%	309	4
Other _____	15%	62	5

TABLES BY OVERAL RESPONSE

Table 12.1: Priorities: What kinds of open space would you most like to see in your community?			
	% Total Respondent	Total Responses	Rank Order
Green space / park space	81%	343	1
Recreational access to the waterfront	77%	325	2
Playground	66%	277	3
Community garden	62%	260	4
Outdoor benches and tables	61%	259	5
Space for organized sports: basketball, tennis, soccer, handball courts	47%	200	6
Other _____	4%	16	7

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 13: Surveys Completed By Language:				
	Within LSRD		Outside LSRD	
	Total Responses	% Response	Total Responses	% Response
English	198	63%	62	67%
Chinese	103	33%	25	27%
Spanish	12	4%	6	6%

Table 14: Respondent Self-identifies as Resident of Two Bridges Neighborhood				
Total Residents	Within LSRD		Outside LSRD	
	Total Responses	% Response	Total Responses	% Response
For Less than Five Years	30	10%	4	5%
1-10 Years	32	11%	11	13%
11-20 Years	75	25%	6	7%
20 Years Or More	167	55%	61	74%

*% calculated based on 304 (LSRD) and 82 (Outside) self-identified residents

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 15: Respondent Self-identifies as Other Stakeholder in Two Bridges

	Within LSRD		Outside LSRD	
	Total Responses	% Response	Total Responses	% Response
I am a property Owner here	27	9%	0	0%
I am a Student Here	16	5%	2	2%
I am an advocate/organizer/volunteer	8	3%	9	10%
I used to live here	13	4%	4	4%
A close family member lives here	21	7%	7	8%
I work here	8	3%	10	11%
I own a business here	0	0%	2	2%
Other	2	1%	0	0%

Table 16: Respondent Attendance of CEM or Other Meetings*

	Within LSRD		Outside LSRD	
	Total Responses	% Response	Total Responses	% Response
Yes	158	50%	25	27%
No	144	46%	61	66%

* Survey did not specify, responses reasonably could include tenant & other

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 17: Priorities: Concerns About Proposed Development On Waterfront (In Ranked Order)

	Within LSRD	Outside LSRD	Overall
	Rank Order	Rank Order	Rank Order
Affordability of neighborhood (rising rents, displacement or secondary displacement)	1	1	1
Transportation (ex. subway, Busses, Parking)	9	8	1
Impact of construction (ex. disruptions due to construction, timing of projects, dust & noise)	7	9	1
Height of building/shadows/views	12	6	1
Air Quality (ex. Air pollutants)	16	14	1
Noise (ex. extreme traffic changes)	4	3	6
Open and green space (ex. parks, playgrounds)	10	7	7
Public Health (ex. exposure to contaminants)	3	2	8
Neighborhood character and culture	2	4	9
Infrastructure (ex. water, sewer, sanitation)	8	5	10
Influx of new residents	13	13	11
Overcrowding Schools/Day Care	6	6	12
Local businesses being displaced	5	5	13
Climate Change & Waterfront Resiliency	16	11	14
Waterfront access	14	10	15
Hazardous Materials	11	8	16
Historic resources/architecture	15	12	17
Other	18	15	18

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 18: Priorities: What is Missing for you in your community? (In Ranked Order)			
	Within LSRD	Outside LSRD	Overall
	Rank Order	Rank Order	Rank Order
Affordable, healthy food (grocery stores, farmers markets)	8	7	1
Police & other public safety measures	6	5	2
Affordable, quality housing for local families	1	1	3
Better transportation & other alternatives	4	2	4
Affordable retail stores (clothing, pharmacy, etc.)	10	10	5
Open and green space	3	3	6
Senior activities, educational programs & services	2	4	7
Accessible resources for people with disabilities (shuttle buses, F train elevator)	7	9	8
Schools, educational resources, after-school and youth programs	6	6	9
Cultural spaces & activities	5	8	10
Building maintenance	12	12	11
Community participation	9	9	12
Jobs & Jobs training	11	11	13
Other	13	13	14

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 19: Priorities: What type of business & job growth do you want to see in the community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Retail and security jobs at local businesses	4	4
Training for local residents for tech jobs (coding, web design, etc.)	2	2
Small business incubators for local residents	3	3
Construction jobs on any new developments	1	1
Art galleries supporting local artists	5	5
Other _____	6	6

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 20: Priorities: What do you believe is needed to keep the neighborhood affordable for your community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)	5	3
Low prices for local retail (clothes, home goods, gas, etc.)	3	2
Amount of affordable housing (more units available at various AMI levels)	7	5
Price of affordable housing (at 10% AMI [\$16,210 for a family of 1] and below)	1	1
Affordable parking spaces for locals	2	4
Child day care, senior center, etc	4	7
Small business planning support and improvements for local stores	6	6
Other _____	8	8

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 21: Priorities: What kinds of community facilities do you most want to see in the community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Affordable sports/exercise facility	2	3
Senior resource center	1	1
Health center	4	5
Cultural spaces	5	6
Community Meeting Space	3	2
Job training center	6	4
Other _____	7	7

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 22: Priorities: What transportation needs are most important to you in the community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Elevator or additional escalator service at East Broadway subway stop	2	4
Affordable parking spaces for local residents	3	2
More frequent subway and bus service	4	3
Shuttle for seniors and people with disabilities to get to/from MTA stops	1	1
Other _____	5	5

TABLES BY WITHIN LSRD & OUTSIDE LSRD

Table 23: Priorities: What kinds of open space would you most like to see in your community?		
	Within LSRD	Outside LSRD
	Rank Order	Rank Order
Green space / park space	2	1
Recreational access to the waterfront	1	2
Playground	4	4
Community garden	3	5
Outdoor benches and tables	5	3
Space for organized sports: basketball, tennis, soccer, handball courts	6	6
Other _____	7	7

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 24: Surveys Completed By Language:											
	Within LSRD						Outside LSRD				
	60 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses	
English	0%	92%	97%	59%	87%	69%	65%	83%	75%	60%	
Chinese	98%	5%	3%	36%	13%	22%	35%	0%	25%	7%	
Spanish	2%	3%	0%	6%	0%	9%	0%	17%	0%	33%	

Table 25: Respondent Self-identified as Area NYCHA or OTHER Resident		
	% Response	Responses
Rutgers Houses	4%	17
LaGuardia Houses	1%	6
Knickerbocker Village	10%	44
Vladeck Houses	4%	15

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 26: Priorities: Concerns About Proposed Development On Waterfront (In Ranked Order)											
	Within LSRD					Outside LSRD					
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses	
Affordability of neighborhood (rising rents, displacement or secondary displacement)	1	1	1	1	7	1	1	1	1	1	
Transportation (ex. subway, Busses, Parking)	9	9	6	6	7	8	4	4	8	5	
Impact of construction (ex. disruptions due to construction, timing of projects, dust & noise)	7	5	3	7	9	4	4	3	6	/	
Height of building/shadows/views	12	7	10		8	10	4	3	4	6	
Air Quality (ex. Air pollutants)	16	14		13	10	12	7	/	11	9	
Noise (ex. extreme traffic changes)	4	3	5	4	4	7	6	3	3	4	
Open and green space (ex. parks, playgrounds)	10	8	9	11	4	5	9	3	3	5	
Public Health (ex. exposure to contaminants)	3	2	3	5	2	2	3	1	2	2	
Neighborhood character and culture	2	4	2	2	1	3	2	3	4	7	
Infrastructure (ex. water, sewer, sanitation)	8	6	7	4	3	6	4	5	5	3	
Influx of new residents	13	10	8	12	10	12	8	/	9	8	
Overcrowding Schools/Day Care	6	6	3	3	3	4	6	2	5	5	
Local businesses being displaced	5	6	4	4	5	4	3	5	7	4	
Climate Change & Waterfront Resiliency	16	13	12	10	9	9	6	5	9	6	
Waterfront access	14	12	9	9	9	13	5	/	5	9	
Hazardous Materials	11	13	7	8	6	5	4	4	7	6	
Historic resources/architecture	15	11	11	14	9	11	9	/	10	8	
Other	18	15	13	15	11	14	10	/	/	/	

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 27: Priorities: What is Missing for you in your community? (In Ranked Order)										
	Within LSRD					Outside LSRD				
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Townhouses	NYCHA	Houses	Houses	Village	Houses
Affordable, healthy food (grocery stores, farmers markets)	10	4	4	7	3	5	3	5	8	2
Police & other public safety measures	6	4	5	3	4	5	6	5	3	2
Affordable, quality housing for local families	3	1	1	1	1	1	1	1	2	3
Better transportation & other alternatives	8	3	2	2	7	2	1	5	1	1
Affordable retail stores (clothing, pharmacy, etc.)	10	7	13	9	5	3	5	5	9	3
Open and green space	4	2	9	3	4	2	3	2	2	4
Senior activities, educational programs & services	1	6	6	5	2	3	2	2	4	1
Accessible resources for people with disabilities (shuttle buses, F train elevator)	2	11	8	4	7	3	4	5	9	3
Schools, educational resources, after-school and youth programs	5	8	7	6	4	4	3	3	5	5
Cultural spaces & activities	7	5	3	3	4	2	4	5	7	6
Building maintenance	11	9	11	10	9	8	5	4	10	/
Community participation	9	10	10	7	6	6	3	4	6	8
Jobs & Jobs training	11	10	12	8	8	7	5	5	11	7
Other	/	12	14	11	/	/	/	/	/	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 28: Priorities: What type of business & job growth do you want to see in the community?										
	Within LSRD					Outside LSRD				
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Retail and security jobs at local businesses	4	3	3	5	3	5	3	1	5	3
Training for local residents for tech jobs (coding, web design, etc.)	1	1	2	3	1	3	2	2	2	1
Small business incubators for local residents	2	2	3	1	1	2	1	1	3	4
Construction jobs on any new developments	3	1	1	2	2	1	2	1	1	2
Art galleries supporting local artists	5	4	4	4	4	4	4	3	4	5
Other _____	6	5	5	6	5	/	/	/	/	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 29: Priorities: What do you believe is needed to keep the neighborhood affordable for your community?

	Within LSRD				Outside LSRD					
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Low prices for local everyday needs (grocery store, pharmacy, school supplies, etc.)	6	4	2	3	7	2	3	1	3	1
Low prices for local retail (clothes, home goods, gas, etc.)	7	2	3	1	5	3	2	2	2	3
Amount of affordable housing (more units available at various AMI levels)	5	6	7	6	6	7	4	3	5	4
Price of affordable housing (at 10% AMI [\$16,210 for a family of 1] and below)	1	1	1	2	4	1	1	2	1	2
Affordable parking spaces for locals	2		5	3	3	4	3	3	4	1
Child day care; senior center, etc	4	3	4	4	4	6	5	1	7	5
Small business planning support and improvements for local stores	3	5	6	5	2	5	5	2	6	3
Other	8	7	8	7	8	8	/	/	/	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 30: Priorities: What kinds of community facilities do you most want to see in the community?

	Within LSRD						Outside LSRD			
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges	Two Bridges	Rutgers	LaGuardia	Knickerbocker	Vladeck
Affordable sports/exercise facility	1	5	2	2	2	1	3	3	3	1
Senior resource center	5	1	1	3	1	4	2	1	1	2
Health center	3	2	5	4	4	3	5	4	5	3
Cultural spaces	4	3	4	5	3	5	6	3	4	4
Community Meeting Space	2	5	3	1	2	2	5	2	2	1
Job training center	6	4	6	6	4	6	1	1	6	4
Other	7	6	7	7	5	7	/	/	/	/

Table 31: Priorities: What transportation needs are most important to you in the community?

	Within LSRD					Outside LSRD				
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Elevator or additional escalator service at East Broadway subway stop	3	1	1	2	3	4	4	2	2	2
Affordable parking spaces for local residents	4	3	3	1	1	1	3	3	1	1
More frequent subway and bus service	1	4	4	3	4	3	2	4	3	3
Shuttle for seniors and people with disabilities to get to/from MTA stops	2	2	2	4	2	2	1	1	1	1
Other	5	5	5	5	/	5	/	/	4	/

TABLES BY INDIVIDUAL DEVELOPMENT RESPONSE

Table 32: Priorities: What kinds of open space would you most like to see in your community?

	Within LSRD				Outside LSRD					
	80 Rutgers	82 Rutgers	Lands End I	Lands End II	Two Bridges Townhouses	Two Bridges NYCHA	Rutgers Houses	LaGuardia Houses	Knickerbocker Village	Vladeck Houses
Green space / park space	2	1	2	3	1	2	1	2	1	3
Recreational access to the waterfront	1	2	4	1	1	1	1	3	2	1
Playground	4	5	5	2	1	4	2	5	3	4
Community garden	3	3	3	4	2	3	3	1	5	3
Outdoor benches and tables	4	4	4	5	3	4	1	1	4	2
Space for organized sports: basketball, tennis, soccer, handball courts	5	1	2	6	3	5	2	2	6	5
Other	/	/	7	7	/	/	/	/	/	/

Comments:

1. What is the MOST IMPORTANT thing about the Two Bridges neighborhood to you?

Affordability
Keeping low obesity, safety, cleanliness, nice waterfront, affordability
Safety Waterfront, more business grocery stores, bars, restaurants, seating
Displacement, affordability
Overall community environment - not too much noise, garbage, etc.
Open Space
Lack of food supermarket
It's a family-friendly neighborhood

Affordable housing, green space

Affordable shop and rental

Yes

Crime rate is low/safety, good public security

Affordable Housing

Affordable housing

Affordable housing

The old time neighborhood feel - community

Family, community, affordability

History affordability, housing and safety my neighbors, and affordability of living in the city.

Affordability, ethnic diversity. Two Bridges has been a safe haven for people of color, people of lower economic means and these new

developments with their influx of wealthy residents will destroy that

Keeping a sense of community

Remaining a stable community

Diversity and access to community programs.

Services for the youth within the community

Affordability

Families/ quietness

I don't know

Low Cost Housing

Low cost of living

Affordability, Diversity, Safety. We need our neighborhood businesses and residents to

remain affordable & service needs to longtime residents - not the residents that property developers are targeting w/ high income Affordable rent low income and elderly residents

Diversity of cultures, family oriented, affordable housing

Overcrowding, Crime + Air Quality

Affordability

The Quietness & the affordability of the neighborhood

Community Diversity. Authenticity. The fact there is no Starbucks.

The space. The Affordability. The History. The park space.

The fact people have lived here 10,20,10 + years. Have raised their kids here and they're raising their kids here. It just feels more like a community than anywhere in Manhattan and that's appealing

Convenience of location via subway/ Bus or walking especially as it affect travel to Manhattan and workplace. Affordable housing and feeling of the community and understanding of different cultures and respect for older people and seniors in the neighborhood

good housekeeping, good security and good hospitality Peaceful surrounding

Too much ongoing construction, gentrification makes it unaffordable to low income groups

Maintaining the flavor of the neighborhood/diversity/affordability.

Overcrowding stability of ground foundation Safety! Would like to see a reduction in gang activity and drugs, as well as robberies and other crimes. Madison, Montgomery, Clinton Streets are very dangerous. New residents at 271 south seem to be oblivious of these ongoing issues. The security team at 271 south is aware of the smell of marijuana in the building, multiple instances of which have been

brought up by residents. the security team prior to Nelson management lacks in this area it is like a village, not overcrowded. There is almost everything you would want in the community where you live. You may not know people by name but you recognize your neighbors.

The view of the waterfront, accessibility to local businesses, and Pathmark when it was still there Quiet, less congestion, less people

Rents

Safety

Increased Rent

Affordability

Safety

#1 Diversity and convenience

safety

Family life

Peace and Quiet

We need a quiet, safe and with enough space environment to live Sense of community

Air Quality and noise

safety

My Building and community

affordable rent stabilization; preferential rent

After School & Summer Programs

Convenience

the most important issue is keeping the neighborhood affordable

Sport club, exercise

Preservation of park and recreation areas

Peaceful

Public security

Quality of life, security

Population explosion, living condition, transportation and sanitary condition

Home & Neighborhood safety

transportation subway, public schools

Overcrowding and neighborhood security

Maintaining quiet and safety

A quiet and safe neighborhood Its cultural mix and convenient transportation mainly residential

Community, homey - feel

Space and quiet

My ideal community

the family component

parking, environment, schools, a reasonable supermarket was not replaced

Lack of infrastructure resources.

Lack of access to see waterfront

it's very quiet, I don't want to move, I enjoy living here. it is home

not changing the character of the neighborhood

the beauty behind diversity

I love my neighborhood (yo amo a mi barrio)

accessibility to surroundings for elder

It is quiet. We all get along with each other. I enjoy living here from being a child in school.

the strong and connected working class

immigrant community that has lived and thrived

here for generations. We are a united

community. "remember 9/11" it is a stable

neighborhood not transisant [SIC]

the ethics and morals of our community.

The traditions and culture in our neighborhood

My childhood family and memories.

Supporting the low income residents

Economic sustainability (fair & diverse), family based neighborhood (children & seniors)

Clean air

We have no idea what two bridges organization are responsible for

The diverse neighbors, people are pleasant, I like my studio apt

Low income housing

Quiet, overlooking the river, close access to

public transportation, schools

The space & park in between 265 & 275 Cherry St.

1. Safety 2. Having large shopping mall (such as Pathmark Supermarket) 3. Convenient Transportation 4. More parking spaces
Public security

Surrounding environment and air quality
Supermarket
Affordable rent, convenient transportation, safety community
Rent, convenient parking, playground clean air, place for children
Rental, car park Crime amenities, playground, shopping, parking
Keeping white people out!!
Affordable housing
The People in the community
Having affordable housing for neighbors and long term residents
the diversity
more housing for low income families. Most importantly the families that have lived here should continue to live here regardless of their socioeconomic background
we need a supermarket that is affordable. The Pathmark was the best thing for this populated community
the deli
section 8 and affordability
Health, air quality, affordable parking lot
family and unity and neighbors Community environment and security
air quality and lower price living, parking and grocery
need translation
that the people living here are not kicked out of their homes due to high rent increases
too many high rises being built in a small area
want to be able to enjoy parks with my kids
without feeling enclosed
parking lot is very needed
it is very clean community remains intact

Air quality
Quiet
Air quality

Public security
Every change is important for us
Rental, environment
Rental, environment
Air quality, affordable, convenient transportation and car park
Public security
Supermarket very important
The education and welfare of our youth/keeping it clean Convenience/ease of living for elderly. Clean air Growth & employment
safety
Affordability, supermarket, no overcrowding, noise, etc....
The Community :) and keeping it CLEAN :)
Diverse and affordable housing

The security here + friendly environment
Safety and easiness to train and bus and hospital
Safety Affordability, comfort, space, safety
Safety/Noise/Displaced Residents

Convenience + safety
Affordable rent + living space

Waterfront Access
The Environment
East River
That it stays affordable to live
Affordability
The Air Grocery Store
Affordability
Services that help the low-income people.
Affordability
people
Affordability
No Parking!
its proximity to work and its beautiful school, transportation, change(?)
The High Rent- Big Change
waterfront
affordability

That they begin considering the needs of us tenants. Be considerate of our community
Preserve affordable housing and quality education
cultural mix and accessibility to all the peoples foods etc. culture safety children facilities
Affordability
good neighbors
safety transportation cleanliness markets
That all things; food, rent, etc. remain affordable
affordable rent
Affordability
Affordable grocery shopping and affordable housing
Safe neighborhood, cleanliness Getting more stores to shop
Would I be able to live here anymore

affordability
Affordability
That we remain a diverse community as we have for over 10 years - that ppl who grew up here continue to be able to stay here
neighbors friendliness and culture
aff

NEEDS TRANSLATION

Affordable, small neighborhood feel
Safety, transportation Safety, Shopping, Parking
Health and Safety
Safety
Safety
I think the most important things are public security and clean environment.
Safety and peace, public security, environment and good air Public security, environment, safety and peace and good air Safety, Parking
Safety and security
Supermarket & Safety
Don't let me move away. I want to live here for a long time
Safety and peace, healthy body, fresh air and safe public security

Traffic & transportation Safety, safety and peace, convenient to see doctor and no more rental rise
Safety and peace
Safety and peace
Safety and peace
Safety & Shopping, Supermarket
Safe, convenient
Traffic & Transportation
Safety and peace
Safety Need Supermarket and food shopping
Power station noise, safety and public security
Air quality, environmental afforestation
Safety and peace, good air
Good air
Safety facilities, air quality, transportation, environmental afforestation and sanitation

Security issue, environmental pollution Security issue, air and environmental pollution
Security Shopping & parking & parks
Security issue, rental, air quality and environmental pollution
Convenient Transportation

Community Improvements to suit influx of residents and not thinking of those who has lived here for years
Supermarket, Safety, transportation
Supermarket, Safety, transportation
Safety, Supermarket, parking
safety, supermarket, transportation, parking
safety, transportation, supermarket
safety supermarket
safety, supermarket, transportation, parking
safety, supermarket, transportation, parking
Safety , supermarket, transportation
Safety, transportation, supermarket, parking
Safety, transportation, supermarket
Safety, traffic, parking, transportation
safety, transportation, traffic
safety transportation
safety, transportation, clean air Maintaining the affordability of the neighborhood and the quality of life of residents

Took my view away
overcrowded, expensive, rising rents
Daycare/Summer Camp, Various Services, Parks
& recreation, Safety
Access to seniors programs, bus + Trains

I lost my supermarket not enough schools,
hospital for the residents in the community
with this new building coming we would over
crowded

Supermarket

housingNew Supermarket affordable

2. What are your Top Five Concerns about the new developments along the waterfront, ranked 1-1

(Parking Conditions)

Quality of construction in case of natural disaster or terrorism, enforcement of building codes. Disaster:
flooding, impact of hurricane etc.

Noise reduction level of walls (not to be disturbed by parties of neighbors)

Ownership - affordable co-op

It is not fair that they are taking parking space from the community

There needs to be a place for people not living in any area to take their door to (illegible) their (illegible)
- overcrowding of people and traffic

Employment

I have been getting more dust in my apartment since construction has started

Elevator to Street from Subway F Train line

Rodents

Con-Edison – Plant

3. What is missing for you in your community?

Catholic Church for community to attend, parking conditions

Hospital

Health club

Outside FREE; Basketball, Handball, Tennis courts not for corporate use

Restaurants and delivery options

Proper traffic control

ownership - affordable co-op

Affordable diverse quality restaurants

Access to indoor community room/space to use for group/ organization meetings2 / parking

Adequate parking spaces

programs for teenagers

Parking supermarket

1 middle income housing 2. parking

4. Business & Job Growth

Gym classes

affordable cafes/restaurants that cater to the residents, not expensive restaurants or bars that mostly bring in
transient crowds

restaurants and other food service related jobs

Large scale supermarket (ex. Stop n shop) that would employ community members

Sanitation, cleaning the neighborhood
language for non-English speakers
Farmers market
teacher jobs
supermarkets
movie theaters
training in health care or government service jobs
Restaurants
Restraint
health care related
Better supermarkets
small business training
City jobs
clean air
no businesses keep all residential - less noise and congestion
baseball, etc. - kids play home
- different restaurants
supermarket
jobs for the youth
jobs and opportunities for the youth
health
jobs to not displace residents in general
supermarkets
Food
x more food options, restaurants
affordable grocery store 1. schools 1. parking for community members community outreach
Supermarket
Music Programs
Affordable Legal Services
Black Hair Salons
Business Development Opportunities
Supermarkets medical places
more middle schools
Big Box stores - aldi's/ dollar tree

5. Affordability

super market like stop n shop
affordable - co-op units ownership
Police presence in community
more volunteer based programs
low income 20k
middle income (AMI)

6. Community Facilities

- Fast food stores
- Youth Services
- Outside Basketball, Handball, Baseball, Tennis Courts not for crop use
- Rec Center
- Community recreation indoor/outdoor center with swimming pool (similar to Hamilton Fish Park pool on 128 Pitt St.)
- youth center
- basketball courts
- more local owned stores
- Children's center/camp
- parks
- Afterschool Programs

7. Transportation Needs

- KV residents with years at location should be provide parking spaces
- possible new bus line
- Elevator to the Street from the F train Station East Broadway
- Shuttle for low income
- More bicycle friendly safety and parking
- a trolley car running under south street to the seaport
- longer hours on M22 bus line
- more parking spaces
- public parking
- less cars, more bike and walk paths
- buses to better location and frequent buses
- Better taxi pick up
- shuttle buses to doctor visits
- additional transit stops along south street
- Complementary/ free shuttle along South St. to Financial District or Battery Park (i.e. Downtown connection bus)
- Affordable Parking Spaces
- Community Days
- more police presence walking from east Broadway towards Rutgers Slip towards my building (#32)
- Car Service
- More Police Presence
- on time service
- removal of bike lanes
- re-routing commercial traffic
- express subway line
- parking parking lot
- Local Jitneys?
- Bus stop on South Street
- Better maintenance of sidewalks

more parking
more shuttles
programs for youth
subway
Stop N Shop Major Super Markets
South Street Transit Service
water taxi
Ferry
(Ferry/water taxi)
elevators
better sidewalks
actual parking spaces
Only the f train is available locally and frequently is insecure on nights and weekends
water taxi
Affordable taxi
Safety
parking garages
shuttle - M22

8. Open Space

None, there plenty and our parking spots are being taken away
Fix up the open space we already have
Either Indoor/Outdoor swimming pool, well designed water sprinkler play space for kids
bbq, party room
"all"
"all" (to-do)
secure open space
fix up the FDR drive
pool
active parking
Performance Spaces

Appendix C
Map of proposed ½ mile study area boundaries

Board of Managers
Two Bridges Townhouses Condominium
291-295 & 305-311 Cherry Street & 251-255 Clinton Street
New York, NY 10002
E-mail: board2bridges@gmail.com

June 7th, 2017

Robert Dobruskin, Director
Environmental Assessment and Review Division
Department of City Planning
22 Reade Street, New York, NY 10007

Dear Mr. Dobruskin:

Thank you for this opportunity to provide our comments in regard to the Draft Scope of Work (DSOW) prepared for the proposed developments (CEQR No. 17DCP148M) in the Two Bridges area. We are writing to you as the Board of Managers representing the Two Bridges Townhouses Condominium (TBTHC), whose lot line resides on the south-west corner of Cherry Street and Clinton Street. Our property sits right in the heart of the proposed development sites. Given the close vicinity of the proposed developments, one being directly adjacent of our lot, there will be significant impact to our property and residents in terms of structure and quality of life during and post-construction. We would like to express those concerns and ask for an analysis on the topics listed below.

- **Impact During & Post-Construction**
 - Potential of structural and physical damage to our property's foundation and envelope as a result of the nearby construction
 - Air pollution and air breathability during construction and post-construction
 - How long does the dust stay on the air?
 - What are the health effects that may result from prolonged exposure to dust, debris, and other chemical products that may compromise the air quality due to construction?
 - Noise pollution

- Many of our residents' work at home or are retired, and therefore are often home throughout the day. What is the potential noise impact, at what parts of the construction schedule, and at what times of the day, etc.?
 - What is the impact in terms of noise as a result of the increased population? Our Condominium is only 3-stories and therefore quite close to the street-level and not isolated from the cars and pedestrians outside.
 - There is already an NYCFD Ambulance Emergency Unit located at the corner of Clinton Street and South Street which produces an excessive amount of noise pollution at all the time of the day.
 - Increased congestion due to commercial vehicles & foot traffic already in the Neighborhood and the addition of construction vehicles and inflow of workers to the construction site.
 - Physical Safety
 - There will be a lot of loose objects and machinery high up, increasing the risk of items falling.
 - Increased scaffolding up, limiting open visibility and creating many new blind spots. Has there historically been an uptick in crime in construction areas since it is prone for un-monitored activities?
 - There is a playground at the corner of Clinton Street and Cherry Street where children play after school that need to be protected from getting hurt during the construction.
- **Shadows**
 - Our property is only 3-stories, making it the shortest building relative to all its surrounding neighbors by at least 10 stories or more. The only direct unobstructed path of sunlight the property currently gets throughout the entire day is from the south-east side of the Condominium, between the NYCHA building on 286

Clinton Street and the Lands End I building at 275 South Street. See picture below. The proposed development by Starrett Development would block the only direct sunlight exposure the residents of the Condominium currently get.



Also, given the significant increase in height by the L&M/CIM building, the indirect sunlight currently obtained through the Jefferson and South Street corner, will likely significantly decrease as a result of the larger cast of shadows created. The decrease in sunlight will reduce natural light, natural heat, and therefore the Condominium will likely use more energy to meet heating and lighting need. Also, natural light is known to improve overall health and well-being. If these developments are built as planned, our residents will be literally living in shadows.

- **Neighborhood Infrastructure**

- Does the neighborhood have the resources to absorb the increase demand on services such as:
 - Public transportation (subway, buses),
 - Sanitation & waste disposal,
 - Water supply & sewer drainage,
 - Electricity, natural gas,
 - Police & Fire,
 - Access to food and everyday household supplies,
 - School, library,
 - Daycare, youth center, senior center, recreation facility, general community center and open space, and
 - Access to doctors and medical professionals and facilities

We urge you to include into the scope the above mentioned areas. We greatly appreciated for this chance to provide our comments to the Draft Scope of Work for the Two Bridges area.

Sincerely,

Board of Managers
Two Bridges Townhouses Condominium

**Robert Dobruskin, AICP
New York City Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271**

**RE: Comments on Draft Scope of Work for Two
Bridges LSRD CEQR No. 17DCP148M**

Dear Mr. Dobruskin,

The following details the comments of The Two Bridges Tower Resident Association at 82 Rutgers Slip for the Draft Environmental Impact Statement (“DEIS”) that will study the environmental impacts for the proposed amendments to the Two Bridges Large Scale Residential Development Plan (LSRD), CEQR No. 17DCP148M.

We have echoed many comments of our partners and colleagues below to stress the importance of examining these important issues.

Introduction

While we applaud the Mayor’s goal to build and preserve 200,000 units of housing in the next ten years, and we welcome the addition of low-cost housing that is permanently affordable and new development that serves local needs, we urge the city to more carefully and stringently evaluate the three proposals for the Two Bridges LSRD.

These projects will add nearly 7,000 new residents to a small, underserved area that is already vulnerable to climate change impacts, gentrification and the displacement of people, businesses, and culture. The LSRD alone has seen 303 eviction cases filed from January 2013 to June 2015 including 135 at 82 Rutgers Slip alone, and the speculative pressure is mounting as new developments come online. We do not feel that the true potential local impacts will be examined through the city’s public review process, and no locally appointed or elected official will get to vote on the projects.

While other neighborhoods slated to absorb this level of development are doing so through a rezoning that has at least been preceded by a zoning study that reflects a vision, this neighborhood has not been afforded that right, and we must question why that is. The comments below are echoed in many of our partner’s testimonies and are offered to ensure that these projects are examined in full light of the enormous potential impacts they will have on this community, in the hope that our decision-makers will make genuinely informed choices.

Project Description

We feel we lack the necessary detail and transparency on DCP's determination of the project's magnitude. We continue to ask why is this action being treated as a minor modification of an undescribed special permit or treated as an authorization (neither of which require ULURP review) rather than as a special permit, and what is the basis for the determination? There is reference by the DCP in their letter to the Borough President Brewer and City Councilwoman Chin that their decision was based on Section 2-(6)(g)(5)(ii) of the Rules of the City of NY and on waivers to the LSRD including a 1995 waiver. They state that "through the LSRD regulations waivers were granted..." The LSRD zoning regulations are detailed in Section 78 of the Zoning resolution with specific regulations for the modification of the LSRD thru authorization and/ or special permit. Section 78-311 also specifies the circumstances and findings for granting authorizations or special permit modifications.

The DEIS must explain in detail how the Section 2-(6)(g)(5)(ii) of the Rules of the City of NY relate to (and apparently are deemed to override) the provisions of Section 78 (especially 78-311 and 78-313) of the Zoning Resolution. The DEIS should also provide a full description of the application for and the rationale and findings of the 1995 special permit of which the proposals are requesting a minor modification.

The current LSRD regulations limit the maximum floor area, lot coverage, height, etc. This limits the amount of floor area allowed. The proposals would essentially double or triple the existing built floor area in each of the project sites. Although the proposed floor area would be allowed under the underlying C6-4 zoning it is unclear if at the time the LSRD as an overlay district was designated or when the 1995 special permit was granted, the City did an evaluation based on a "worst case" build out of all of the proposed sites at a full C6-4. For this reason, it can be argued that the "minor modification" allows for an increase in the "density of population" which under LSRD regulation would require consideration of the special permit process and would need to meet the findings for granting the special permit. (See Zoning Text Section 78 - 313 (c).)

The DEIS should provide a full description of the rationale and findings of the original LSRD designation. In replacing the Urban Renewal Area with the LSRD, it was stated that it would continue to provide low, moderate and middle income housing (indeed all the current units meet that definition). The proposed development will be building 75% of its units at market rate, which is upper middle to upper income housing.

Purpose and need of the proposed actions

It is not clear how the proposed action fits within the LSRD land use decision-making process.

Clarify the distinction between a major and minor modification of the LSRD. What is the threshold for a minor modification? If the minor modification is required to modify the site plan and zoning calculations, what is the floor area threshold that is being triggered? By how much does each individual project exceed the floor area limitations of the LSRD? **How did the Department of City Planning come to a determination with regard to the modifications that the projects, under Finding C: "the distribution or location will not unduly increase the #bulk# of #buildings#, density of population or intensity of #use# in any #block#, to**

the detriment of the occupants of #buildings# in the #block# or nearby #blocks#; (d) that such distribution or location will not affect adversely any other #zoning lots# outside the #large-scale residential development# by restricting access to light and air or by creating traffic congestion (Zoning Text Section 78-313).”

Furthermore, the proposed actions are described as adding “well-designed low-, moderate-, and middle-income housing...consistent with the development objectives of the Two Bridges LSRD.” Specify the number of units proposed that fall under each of these income brackets, and the number of other units proposed intended for higher-income brackets.

The DEIS must specify how the breakdown of units per income bracket compares with vacancy rates for each income bracket at the level of the community district, the borough, and the city. Also, specify how the affordability breakdown relates to the distribution of AMIs of current residents in the study area.

Analysis Framework

Given the build year of 2021, consider the impact of likely eventual rezonings under discussion at DCP, including the rezoning of the Chinatown core; projects such as the Lower Manhattan Coastal Resiliency Project; and potential development proposals for local soft sites identified in the Chinatown Plan (2014) and other soft sites. The analysis must also incorporate the likely increased development impacts from the above projects, in addition to the Extell development at 250 South Street, Essex Street Crossing, and NExt Generation NYCHA plans at LaGuardia Houses.

Land Use, Zoning, and Public Policy

The proposed developments must be assessed for their consistency with land use, zoning, and public policy. The proposed quarter-mile study area is inadequate for an examination of neighborhood impacts. The study area should be increased to at least a **half-mile radius**, to include the portions of the neighborhood most likely to be impacted as well as adjacent areas that will receive new development, extending north to Delancey Street. An irregular study area (as allowed under the CEQR manual) is appropriate and possible, given that most of the impacts will be felt in the adjacent Manhattan neighborhoods, and not in the East River or in Brooklyn.

Given the location of the proposed developments, sea-level rise and climate change impacts must be examined as a major factor influencing land use trends. The area lies in a Category 1 Hurricane Storm Surge Area and in Evacuation Zone A. Residential developments of this magnitude (up to 7,000 additional residents) must be examined in relation to vulnerability, disaster preparedness, and mitigation and the ability of front-line responders to bring all families to safety in a Hurricane Sandy or worse situation.

The land use analysis must also examine the impact of the proposed developments on the Lower Manhattan Coastal Resiliency Project (LMCR), and any likely rezonings, such as the Chinatown core, under discussion at DCP. The proposed land use actions will alter what is now an affordable residential district by introducing high numbers of market rate units into a small area and increasing median housing prices. The DEIS needs to delineate both the absolute increase in the overall number of market-rate units in the study area, and the impact of the introduction of market rate units on the proportion of overall affordable units (affordable to local AMI). The analysis should not be limited to public studies but should also include Furman Center reports, eviction data, and the Chinatown Working Group data.

Given the importance of maximizing the number of affordable units, the DEIS must explain assumptions about unit size in determining the potential number of affordable units and examine an alternative of using a square footage percentage for calculating affordable units rather than a percentage of units.

Socioeconomic conditions

Direct Residential Displacement

The draft scope should disclose specific relocation plans for the residents of the 10-20 units at 80 Rutgers Slip, including how relocation costs will be addressed for those residents, the duration of time they will be relocated, where they will be housed and under what conditions, and what costs will be incurred and by whom. Although this is not direct displacement it will, at least in the short run, reduce the number of affordable senior housing units by 10 as the vacated units will not be refilled but will serve to house the existing seniors being displaced.

Indirect Residential Displacement

Indirect residential displacement as defined in CEQR, is involuntary displacement of residents that results from a change in socioeconomic conditions brought about by a proposed project. The objective of the indirect residential displacement analysis is to determine whether the proposed project may either introduce a trend or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. (CEQR) Throughout the pre-draft scope meetings with the community, the Task Force surveying of residents, and in public hearing testimony, concerns and anxiety about individual and widespread displacement dominated the list of local concerns. Considerable attention must be paid to the projects' indirect displacement impacts.

Indirect displacement is not adequately examined under current CEQR guidelines. The distinctions set up by CEQR between "hard" impacts--those associated with the natural environment such as air quality and traffic, and "soft" impacts such as indirect displacement and impacts on school capacity is flawed and results in minimization of the real human costs of development projects. For these reasons, a more detailed analysis (see below) of the potential

for indirect displacement is required for decision-makers to be informed of a project's true impacts and move beyond mere disclosure to true mitigation.

- First, the study area for secondary displacement, like the study area for land use, should be increased to a **half-mile** and drawn to include adjacent Manhattan neighborhoods of Chinatown and the Lower East Side, up to Delancey Street and including census tracts that are predominantly Latino and Asian.
- Second, there must be an examination of the potential of the projects to **accelerate** the trend of changing socioeconomic conditions that will potentially displace vulnerable populations. In addition to data from the Census, RPAD, and current real estate market data, the analysis must also include data sets and information that correlate more directly with potential displacement risk. These sources should include eviction and foreclosure data for the past five years, building and alteration permits, demolition permits, complaints of landlord harassment, an inventory of currently regulated building stock that will soon expire, all subsidized, rent regulated and/or stabilized apartments, an inventory of local requests for Right to Counsel, and interviews with local housing groups who counsel tenants who have been subject to harassment, discrimination, and displacement. ANHD's (2017) Affordable Housing Vulnerability report, using data from 2015 and 2016, has found that Chinatown/LES ranks among the highest citywide in numbers of LIHTC units eligible to expire in the next five years (1933) and highest in at-risk Mitchell-Lama units (1244), and at-risk HUD-subsidized units (605). The three proposed projects are highly likely to accelerate the loss of these units; therefore, these units and others mentioned above must be included in the calculation of indirect displacement.
- To be comprehensive and accurate, the presentation of study area characteristics must also include an examination of the number and demographic make-up of local residents who are losing preferential rents in subsidized housing and the availability of equivalently-priced housing in the vicinity. This data is available from ANHD, ProPublica, the Furman Center, and local housing groups. If the area is already experiencing displacement, and the proposed developments accelerate the rate of displacement, then mitigations to address displacement must be put in place.
- The Step 1 analysis described in the Draft Scope of Work must look beyond income. To be comprehensive and accurate, the Step 1 analysis must include race, level of educational attainment, rent burden, overcrowding, and linguistic isolation, key factors that would provide a more accurate picture of those made vulnerable by the addition of new population with higher income.
- The Step 2 analysis is unduly vague. What threshold is being utilized to evaluate whether the impact is "large enough to affect real estate market conditions" and how is the impact being determined?
- Step 3 states that no further analysis is necessary if the area is already experiencing a readily observable trend toward increasing rents. It is highly possible that the analysis will cite projects such as Extell as evidence that such a trend exists. However, such a trend, and the speculative forces that propel the trend, are the *reasons* that people are losing their homes because of increases in rent, loss of preferential rents, conversions to

market rents. As identified in the CEQR guidelines, further analysis should be performed regardless of trend, to obtain adequate information about the acceleration of market force impacts.

Mitigations

The provision of low-cost housing in proportion to local needs. The DEIS needs to study not only income groups, but housing availability at each income level, and study the provision of low-cost housing on site or within the district that *increases the proportion* of local housing affordable to local residents.

Indirect business displacement

In addition to public data sets, examine the economic development section of the CWG Plan, as well as the AALDF study, which identifies the loss of culturally unique businesses and services that are essential to the residents and the local economy. Use the data from the indirect residential displacement to determine the numbers of people who shop in small local businesses in the larger study area, to project impact on local business.

Examine potential impacts, such as increases in rent, on existing businesses that serve the local market and provide needed services:

- Madison Street: moderately priced retail food outlets, personal services
- Jefferson Street: grocers carrying affordable frozen vegetables and fresh meat and poultry
- Rutgers Street: barber shop

These businesses are important to existing residents but are not likely to be patronized by new, more affluent residents. They are also likely to be indirectly displaced through increases in rents.

Specifically, examine impact on needed food resources. Community members at the pre-EIS meetings expressed concern about the dearth of local retail facilities for affordable food, and the participants are very concerned about the neighborhood need for a large, affordable, and healthy grocery store. Since the loss of the Pathmark grocery store, residents have had to rely on Fine Fair and C-Town. C-Town in particular, which offers a wider variety of fresh food, is distant, closer to the Brooklyn Bridge. One of the buildings in the current EIS area threatens the oldest remaining local deli (Stop 1 Deli, is located in 265 Cherry Street, reportedly serving the community for more than 30 years).

Examine how far residents would need to travel to purchase needed goods at prices comparable to what are currently available in the local area, as well as means of transport to reach these stores, and the level of difficulty for people who have problems with mobility in accessing these stores. In particular, consider the impact on availability of stores that carry culturally specific produce and products that may be subject to indirect business displacement.

Examine specific likely impacts on local bakeries and food processing – i.e., noodle factories, which provide local employment and serve a local market. Examine the potential for the new development to increase the number of bars and restaurants targeting tourists and other

seeking nightlife, especially in light of the proliferation of these establishments and their negative impacts on the residents of the Lower East Side.

Mitigations

New retail is part of the development plan: consider the market and price points to be served by these new facilities and ensure that they will meet local needs. Examine ways to incentivize retention and attraction of locally serving retail that is affordable to current residents of the neighborhood.

Mitigations should include both tax incentives for property owners who rent to local businesses as well as limitations on certain uses - including but not limited to size. Mitigations should also include discussions with the community about businesses they are lacking, which have included: commercial banks, dry cleaner/tailor, shoe repair, family-style restaurants, and retail outlets for fresh produce.

Community Facilities and Services

Fire and Police

While the draft scope indicates that detailed analyses are not needed for fire and police services, the number of units in the project constitutes a "sizable new neighborhood where none existed before." Community residents feel that community services such as the police, and mail service/post office are already overtaxed. Civil services such as police, fire, postal, and sanitation must be examined. At least 4200 new units are slated for a two-block area by the year 2012.

Schools

Any increase in the need for school seats should be examined, not simply increases that reach the five percent threshold of significance. Any increase in need for school seats that would result in local schools being near or at 100% capacity should be examined. The analysis of elementary and intermediate schools in and served by the "sub-district" should include a review of student performance level data as well as enrollment and capacity; if the schools in the sub-district are at or near capacity, an investigation of the schools in the entire district may also need to be looked at.

PS 184 is a dual-language District 1 School, the only in the neighborhood that serves pre-k-8th grade. Student population is nearly 70% Asian. Many students transfer in from other District 1 schools at 6th grade. Many families from outside the area send their children there to take advantage of the dual language instruction, a fact that will not be picked up when examining local need. Total student body is 671 students and there is no adequate gymnasium. Examine impacts of overcrowding on PS 184, especially in light of universal pre-K moving to full day. Ascertain whether there any schools in the area that are under construction or in the planning stages. If not, community residents have suggested, the developers should commit to provide a new school as a mitigation.

The school district includes a variety of schools, some of which are highly sought after small specialized public schools. Examine the impact of the additional residents on existing competition for these slots. Assess the impact on under-utilized schools which are in danger of losing funding that is tied to their student population.

Whether analyzed under Child Care or Public Schools in the EIS, consider the impact of the influx of so many new residents on the availability of quality universal pre-Kindergarten resources within the neighborhood. (This provides free childcare for children age 4-5).

Several new projects currently under construction or proposed in the vicinity will similarly increase demand for school seats. Cumulative impacts emanating from the Extell project, Essex Crossing, and the newly proposed NYCHA in-fill project proposed for LaGuardia Houses should also be examined.

Mitigations

Examine potential mitigation of building new schools for increase in demand. See Zoning Text - Section 78-113 "If additional public facilities needed If the Department of City Planning reports that the proposed #large-scale residential development# can be expected to create a need for one or more new public facilities in the neighborhood, the City Planning Commission may, in its discretion, recommend that a site for one or more such facilities should be reserved within the site of such proposed #large-scale residential development#.

Child care facilities

The analysis of child-care facilities must also include data on current wait lists for these facilities and if any new facilities are under construction/planning; depending on where facilities are located and the number of new slots anticipated to be needed as a result of the project, a new facility (s) on site may be called for. Affordability of any new childcare resources should be considered as it impacts the availability of this essential resource for low income residents (particularly in nearby NYCHA buildings).

Libraries

Examine services offered by the existing libraries and whether they are sufficient to handle the increased population brought by the project. Examine current utilization of the current libraries and any projected increase from new developments either already in construction (Extell, Essex Crossing,) or proposed such as the NYCHA infill. Feedback at the pre-EIS community meetings indicated overuse of the local branch as a concern, and suggested a need for an additional library.

Mitigations

Examine potential mitigation of building a new library for increase in demand.

Social services and culturally accessible programs

Examine available resources and waiting lists for social service, cultural and family programs for people of all ages, especially child care, afterschool, and seniors, offered by local settlement houses: Henry Street Settlement, Grand Street Settlement, Educational Alliance, as well as affordable, accessible bi-lingual and bi-cultural programs for speakers of Chinese and Spanish. Identify potential sites for new community facilities, in cases where impact requires mitigation, and the accessibility of new sites for local residents in terms of public transportation and walkability.

Examine the loss of culturally specific facilities and programs provided by nonprofit arts and other organizations and businesses.

Youth programs

Afterschool programs

Examine after school programs offered by the schools in the study area and whether they would be likely to be able to handle the increased school age population; also look at such programs, if any, offered by nearby high schools. The three after-school programs offered on site at PS 184 are likely to be overwhelmed--examine impacts of new population on these programs. Examine impacts on school budgets if it is determined that new afterschool programs will be needed.

Examine the capacity of current youth programming resources, i.e., programs subsidized by NYC Department of Youth and Community Development and the NYS Office of Children and Family Services to accommodate the needs of new school-aged residents.

Health Care Facilities

CEQR requires a detailed assessment of the ability of health care facilities to provide services for a new project if “a proposed project would directly affect the physical operations of, or access to and from” a health care facility or “a proposed action would create a sizeable new neighborhood where none existed before.” Though the proposed development is not technically a “new neighborhood,” it includes dense residential development with approximately 3,000 new housing units, 200 of which will be for seniors. This influx of new residents will increase the demand for health care services, including skilled nursing care facilities. The development does not propose expanding or creating any new health care facilities. We support Borough President Brewer’s call for a Health Impact Assessment as part of the environmental review. The assessment should consider the issues raise below.

As described in the Community District 3 District Needs Statement, “CD3 is a federally designated health professional shortage area in the fields of primary care, dental care, and mental health.” There has been a recent loss of a longstanding nearby health care facility (Rivington House), compounding the need for accessible primary care and skilled nursing care, a top CB3 priority. A recent CB3 Urban Planning Fellow report, *The Role of Safety-Net Providers in Manhattan Community Board 3*, cited a need for more urgent care locations.

Figure 2. Health Care Facilities In and Around Community District 3⁴⁸



- Study the capacity of existing area outpatient and skilled nursing care facilities to determine the need for additional provider capacity, and identify suitable sites where urgent care and skilled nursing care can be integrated to serve the current and proposed residential population.
- Consider the impact of new population on provision of emergency care. Gouverneur Health Center is at capacity and has no emergency room, and people are compelled to go to Beekman or Beth Israel for emergency care. Beth Israel is slated to close over the next four years, shifting services to other Upper West Side locations, and will reduce its number of inpatient beds by 75%. Examine where current and new populations will go for routine, urgent, and emergency health care, the capacity of these facilities, and the transit options available to those who need them.

Centers and services for the elderly

While seniors and their needs are not specifically called out in CEQR, they are a vulnerable population, particularly with regard to health care and other services and subsequently, the impacts of the three proposed projects on the area's capacity to serve seniors adequately warrants extra scrutiny.

- Consider impact on local senior services, including the 13 LES Senior Centers and several Naturally Occurring Retirement Communities (NORCs) which offer services to people who wish to stay in their communities as they grow older. These services have already been impacted by proposed state budget cuts.
- Consider strain on local medical facilities which are vital to the elderly. The proposals call for 200 new units for seniors. Examine capacity of local hospitals, health facilities, etc., in light of the significant increase in the senior population.
- Consider the impact of new senior population on provision of emergency care. Gouverneur Health Center is at capacity and has no emergency room, and people are compelled to go to Beekman or Beth Israel for emergency care. Beth Israel is slated to close over the next four years, shifting services to other Upper West Side locations, and will reduce its number of inpatient beds by 75%.
- Consider impacts on these health facilities of additional number of seniors, and consider where seniors in the Two Bridges area will go for hospital care, and how they will get

there. Consider the location of urgent care facilities in the area, and their capacity to care of the current senior population as well.

Open Space

New and existing open space needs to be further detailed. Site 5 proposes 19,000+ square feet of new but *private* open space. Site 6A adds 3,200 square feet of new but *private* open space. Conduct a community-driven assessment of the “uses” of surrounding open spaces. Include an analysis of how the positioning and quality of the new open space can: serve as safe connections, synergize with existing open spaces and be easily accessed by the public. Analyze new open space in relation to surrounding playgrounds.

When calculating open space ratio, the examination must factor in that much of the existing local open space is either private, as in the case of Lands End I and II, or perceived as for the use of public housing residents, as in the case of Rutgers and LaGuardia Houses, or given over to medians. The open space calculation must also acknowledge that although Pier 36 is technically publically accessible, it is located behind Basketball City, treated as private, and serves as a party-boat launch that serves tourists but not the general public.

Examine pedestrian safety and usability of the shorefront promenade from Montgomery Street to Rutgers Slip. While the promenade qualifies as open space, its use and the safety of its users are routinely compromised by hazards such as vehicles turning into and out of FDNY EMS Division 1/Station 4, the Department of Sanitation facility, and the presence of official vehicles that are occasionally parked directly on the pedestrian and bike access adjacent to the promenade, forcing users into the roadway. Consider in particular the mobility challenges for seniors, who may need additional time to cross streets, and avoid bicycle traffic.

The only public open space in the LSRD is Cherry Clinton Playground. Examine the impact of new residents on this park, particularly on the current heavy use of the basketball court and equipment by neighborhood and school children after school hours and during the summer. Consider impact of mitigations to this park including repair of basketball facilities, additional play structures, improved seating and landscaping, reconfiguration of the handball court to suit current and future needs of park users.

Examine impacts of construction across three years of build out on availability, environmental quality and accessibility of all local open space.

Consider mitigation of providing additional publicly-accessible open space on site(s), with both active and passive uses.

Consider mitigation of using the parking lot at the FDNY/EMS/DOS stations under the FDR as additional open space and using the rooftops as possible convertible open space areas.

Consider mitigation of adding play areas for young children along the waterfront esplanade area as none exists now.

Consider mitigation of relocating the FDNY/EMS/DOS stations under to FDR to other city owned property to allow for more open space.

Shadows

Analyze ground shadows cast by proposed structures (zoning envelope or actual building to scale) at all times of year and throughout the full day. Analyses are likely to be proposed only for a specific date such as December 21st (the Winter Solstice). But shadows cast will change as the seasons change thus additional days and times need to be analyzed.

Examine the impact of shadows on parks, playgrounds, seating areas and other open space.

Examine the shadow effect on the piers, waterfront walkways and the fish and Benthic community in the water.

Historical and Cultural Resources

The TWO Bridges LSRD draft scope of work indicates that it will consider “the historic resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance” as identified in the CEQR Technical Manual. These “include designated New York City Landmarks (NYCLs) and Historic Districts (NYCHDs); properties calendared for consideration as NYCLs by the Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation; properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing, or properties contained within a S/NR listed or eligible district; properties recommended by the New York State Board for listing on the S/NR; and National Historic Landmarks (NHLs)”. (p.2)

This list covers only formally considered or designated sites, and does not take into account other places that the community may consider valuable, such as temples, community/arts and cultural organizations, civic associations, settlement houses, commercial strips lined with small businesses that cater to the diverse multi-ethnic and multi-cultural community, streets and/or open spaces where street festivals, cultural practices, the waterfront where recreational activities, etc. take place.

CD 3 and the Two Bridges neighborhood is significant to the history of the United States. Not only was it home to the first Presidential Mansion at the corner of Cherry and Pearl Streets, [1] it was also the point of destination for successive waves of immigrants who settled here immediately after immigrating to the United States. The area’s rich and multi-layered history is reflected in the multi-ethnic and multi-cultural make-up of current residents, as well as a number of historical museums, including the Museum of Chinese in America, the Lower East Side Tenement Museum, and the Museum at Eldridge Street. Despite its incredibly rich history, the efforts to preserve the neighborhood’s historic resources have been insufficient especially in

comparison with the rest of Manhattan. An area adjoining the Two Bridges neighborhood was placed on the National Register of Historic Places in 2000, [2] but the National Trust for Historic Preservation named the Lower East Side to its national list of “11 Most Endangered Historic Places” in 2008, noting “Slapdash and haphazard renovations have led to the destruction of architectural detail, while modern additions to historic buildings sharply contrast with the neighborhood's scale and character” [3]. Within CD 3, the four designated New York City historic districts and extensions are the St. Mark’s Historic District and Extension, the East Village/Lower East Side Historic District, and the East 10th Street Historic District. (Source: Pratt City and Regional Planning Fundamentals FA 2014 Studio report)

[1] *now commemorated on a plaque underneath the Brooklyn Bridge...* Solomont, Elizabeth. “A Piece of History Stands Hidden on Brooklyn Bridge”, New York Sun, June 30, 2006

[2] Solomont, Elizabeth. “A Piece of History Stands Hidden on Brooklyn Bridge”, New York Sun, June 30, 2006

[3] National Trust for Historic Preservation, 11 Most Endangered Historic Places, <http://www.preservationnation.org/issues/11-most-endangered/locations/lower-east-side.html>, retrieved October 22, 2014

The tasks listed in the draft scope of work are to:

- “Consult with LPC regarding the potential archaeological sensitivity of the project sites.... (since) there is potential for the recovery of remains from Colonial and 19th Century occupation on the project sites.
- Map and briefly describe any known architectural resources within a 400-foot study area surrounding the project sites.”

Given the scale of the proposed buildings and the shadows they will cast on the neighboring area, a 400-foot boundary will not be sufficient to understand the direct impacts on open and public gathering spaces and commercial strips that are of cultural and civic value to the community. The impact on air quality in these spaces during construction may also be significant. The study area boundary should be expanded to a **half-mile**.

- “Conduct a field survey by an architectural historian of the study area, to identify any potential architectural resources that could be affected by the proposed actions.”

A survey by a paid expert would be limited to only structures of architectural value, and not take into account places of cultural value to the community. There should be consultation with community members of diverse ethnic and cultural backgrounds resulting in a cultural asset and impact assessment. Small public open spaces, public plazas and the waterfront in this dense neighborhood provide opportunities for not only active or passive recreation (especially for the elderly who make up a large proportion of the population in this neighborhood), but also for civic engagement and cultural expression and activities (such as early morning tai-chi and sword dances along the waterfront, as well as a whole range of recreational activities, including soccer games, that are an important part of the daily lives and culture of families who live in the area). Those must also be taken into consideration in assessment of the impacts during and after construction. The community has already raised concerns about the potential impacts of heavy

traffic on air quality, noise and safety at congested crossings (that might affect access to these spaces), and how the scale of the projects would affect the feel of the greenway.

- “Evaluate the potential for the proposed actions to result in direct, physical effects on any identified architectural and archaeological resources.”

Again the focus is only on architectural and archaeological resources rather than places of cultural and ethnic history or current cultural practices and needs of the community. The study should include a cultural asset and impact assessment.

- “If applicable, develop measures to avoid, minimize, or mitigate any adverse impacts on historic and cultural resources, in consultation with LPC.”

Given the scale of the proposed buildings (i.e., the number of new residents, the traffic that will be added to the community, as well as the shadows the buildings will cast on the neighboring area, etc.), the 400-foot boundary for assessment should be expanded to **one half mile** to understand the impacts on the cultural and historic resources.

Include a community survey and/or visioning session to identify places (including all kinds of public open public spaces, temples, etc.) of historic and current cultural significance and value to the community that should be considered in impact assessment and remediation measures, resulting in a a cultural asset and impact assessment. Other citywide sources, such as the City Lore and Municipal Art Society’s Census of Places that Matter, should be consulted in identifying historic and cultural resources of the area. The CWG study has a chapter that identifies cultural and historical resources and potential places of significance and should also be used as a reference. The analysis also should take into account how the new development may potentially lead to closing of existing stores or facilities that are essential to maintaining the ethnic and income diversity of the community – which is a historic legacy of this neighborhood.

Urban Design and Visual Resources

The draft scope proposes to follow the requirements in the CEQR Technical Manual to conduct a preliminary analysis of urban design and visual resources, since the project has the potential to “make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline.” The assessment is to include the following approach and tasks to determine whether the project, in comparison to No Action condition, would create a change to and could potentially adversely affect the pedestrian experience that is significant enough to require further study. A detailed analysis will be prepared if warranted based on the preliminary assessment. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.”

The views, not only from the Brooklyn waterfront to the project site, but also from the neighborhood should be analyzed, taking into account how the height of new buildings contrasts with the neighboring structures and existing street layout. The transition from the adjacent

context and the new development should be considered both in terms of long views and on the ground street experience of pedestrians.

The project claims not to limit access to the waterfront and to provide additional open spaces on the project site that will be publicly accessible. The impacts on access to and the quality of existing open spaces (shadows, wind factor, air circulation, as well as dust and air quality) - both during and after construction -- should be explored and taken into account in considering project impacts. The Two Bridges neighborhood does not have as much open space compared to CD 3 (which is concentrated along the waterfront) or Manhattan. Therefore, it is critical that existing open spaces are not adversely impacted even if the new development proposes to create new open spaces on the project site.

Moreover, measures to improve access to the waterfront should also include strategies to address and improve the current barriers (the elevated highway and South Street).

The proposed 62-story building on Lot 5 of Site 6A located along Clinton Street has the potential for not only obstructing views from the neighborhood to the waterfront, but also casting shadows and creating wind tunnel on Clinton St. A detailed analysis of this street with the proposed action should be prepared.

In addition, Clinton Street, together with Rutgers Slip are the two streets that connect and provide access from the neighborhood to the waterfront. The Draft Scope mentions improvements and open space amenities on Rutgers Slip (p.3, 6, 7, and 8). However, other than traffic, travel and parking analysis on Clinton Street, no improvements or open space amenities are proposed. In addition to detailed analysis of Clinton Street, the proposed development should include urban design improvements, including but not limited to pedestrian friendly street and sidewalk enhancements to Clinton Street.

The proposed 62-story and 69-story buildings on Lot 1 and 2 of Site 5 located along South Street and former Jefferson Street have the potential for not only obstructing views from the neighborhood to the waterfront, but also casting shadows and creating wind tunnel on South St. A detailed analysis of this street with the proposed action should be prepared. In addition, the proposed development should include urban design improvements and amenities along South Street from Clinton Street to Rutgers Slip.

In addition, the demapped Jefferson Street is currently a visual connection as well as informal access from the neighborhood to the waterfront. There is currently an easement along this demapped street between Cherry and South Streets. Provided that the proposed development would potentially increase the population of the area to almost 6,000 new residents, that there is limited open space in the Two Bridges neighborhood, and provided that the proposed development is only considering urban design improvements and connection to the waterfront through Rutgers Slip, the demapped Jefferson St. should be considered as additional access from the neighborhood to the waterfront.

The proposed development should assess how urban design features are integrated/ connected to existing East River waterfront plans, including but not limited to the Plan for the East River Waterfront, the BIG U project, the East River Blueway Plan as well as OneNYC Lower Manhattan Coastal Resiliency plan among other relevant official plans.

Examine the completed Slip and Pier projects. The Catherine Slip and Pike / Allen Street pathway will add much more foot and bike traffic, and related developments.

Mitigations

With regard to Urban Design and Visual Resources, DCP should disclose, analyze and adopt mitigation strategies to address the impact of the proposed development on the Two Bridges neighborhood.

- Investigate the easement along the demapped Jefferson Street to determine whether it would allow public use between Cherry and South Streets. If not public, establish it for public use that would allow the unrestricted passage of people from the Two Bridges neighborhood to the waterfront.
- Require that the proposed development include urban design / open space amenities along Jefferson Street.
- Require that the proposed development include urban design / open space amenities and improved crossings on Rutgers Slip to South Street and the waterfront park.

Natural Resources, Hazardous Materials, Water and Sewer Infrastructure, Solid Waste, Energy

The EIS needs to fully examine the implications and mitigations required as a result of E designation of Site 5 and determine if other sites should also have E designation. (See concerns identified below.)

Project Site has an existing E designation on Site 5

E-12 determined in the 2013 Two Bridges Health Care Chaplaincy EAS.

CEQR No: 12DCP157M M120183ZSM

National Center for Palliative Care Innovation pdf:

<http://www.nyc.gov/html/mancb3/downloads/calendar/2013/HealthCare%20Chaplaincy.pdf>

The proposed Chaplaincy action included an E designation to “preclude future air quality, noise and hazardous material impacts” with the following stipulations..... (Draft Scope pps 4, 5)

E designation for Air: Regulating heat and hot water systems.... They may only use natural gas and systems must be located at the tallest portion of proposed buildings. Not to exceed National Ambient Air Quality Standards for Criteria Pollutants 1-hour average.

Reference: <https://www.epa.gov/criteria-air-pollutants/naaqs-table>

Low Nitrogen Oxide (NOx) and systems size regulations included... (See suggestions in Air Quality Section below)

E designation for Noise: Requiring future community facilities to achieve 38 dBA window and wall attenuation and a maximum of 45 dBA for interior noise levels. (Scope pg 5)

Nice reference chart to understand dBA levels:

<http://www.dot.ca.gov/dist2/projects/sixer/loud.pdf>

On the basis of these existing conditions, there should be an analysis of the construction noise impacts on the existing/surrounding buildings both commercial and residential, in addition to parks and open space. Impacts (noise and vibrations) should be detailed out and mapped.

Conduct an analysis of and mitigation plan for noise impact of adjacent FDR Drive on proposed residential and open space uses, including playgrounds.

E designation for Hazardous Materials: Required soil and groundwater testing protocol and samples submitted to OER.

A review of the protocols and testing that was submitted for past projects should be made available to the community. On that basis, technical assistance from environmental engineers should be provided to help explain findings and protocols. OER should meet with the community and prepare an analysis/list of potential hazardous materials both on site and to be used during construction which are capable of becoming water (flooding) or air borne.

Mitigations

There should also be a noise mitigation program for these impacted neighbors which includes the distribution and installation of double or triple pane windows as well as air conditioners and air filters, similar to the maps and noise mitigation program in the Atlantic Yards Memorandum of Environmental Commitments.

Natural Resources

While the scope acknowledges that the study site is within both the 100-year and 500-year floodplain, it does not acknowledge that the site is directly adjacent to the East River, a significant natural resource in NYC and an important habitat for aquatic animal species and vegetation. There is no mention of aquatic natural resources in this section.

The intersection of the natural resources (especially surface and groundwater) and the E-designation for site 5 with requirements under the OER should not be overlooked in this section as there will be significant potential to impact both groundwater resources as well as the adjacent East River.

Include an expanded study area, (CEQR recommendation = ½ mile) to include adjacent portion of East River in natural resources analysis framework. This will ensure aquatic resources are accounted for in historic, existing and future conditions analysis.

Regarding the existing natural resources, there should be clarity on the area covered in “project vicinity”. The 9+playgrounds included should be deemed sun-sensitive sites and be examined in the shadow study.

The Natural Resources should also examine the impact of the proposed projects on the migratory patterns of birds. Birds are attracted to the light of tall buildings. The proposed buildings are in the pathway of the Eastern Flyover, a vast and critical migratory route for birds. The impact of the proposed buildings and the light they will emit on bird migration should be analyzed. The New York City Audubon Society’s Bird Safe Buildings Guidelines should be followed. <http://www.nycaudubon.org/pdf/BirdSafeBuildingGuidelines.pdf>

Hazardous Materials

Examine the impact on the adjacent East River as a potential recipient of contaminants during excavation.

Mitigations

Identify strategies to keep surface and subsurface runoff from carrying any exposed hazardous materials into nearby water bodies (East River).

Water and Sewer Infrastructure

Provide detail on what sites contribute to the combined sewer area and which are direct drainage into the (East River). Ensure that the analysis is in line with the ongoing and current NYC DEP’s Municipal Separate Storm Sewer System (MS4) permit and Citywide Stormwater Management Plan (SWMP) Program, according to direct discharge and the MS4 permit process has both construction and post construction stormwater control protocols.

http://www.nyc.gov/html/dep/pdf/water_sewer/ms4-quick-facts.pdf

There is no mention of the current Combined Sewer Outfall (CSO) contribution of the site and the projected developments in the scope. Disclose and document CSO impacts. Reference the Open Sewer Atlas Newtown Creek Sewershed data to understand the CSO drainage sheds (and subsequent outfalls) covered by the project site. Examine the current capacity of the Newtown Creek Wastewater Treatment Plant, and how the proposed developments will impact its capacity.

Identify existing and new (proposed) stormwater Best Management Practice (BMP’s) for the project site. New construction must meet the City’s stormwater rule and “manage” 90% of the stormwater runoff “on site”. The majority of new projects have done this through large holding or detention tanks, not green infrastructure (the use of plants and soils). The way in which the stormwater is “managed” is not dictated by the City. Detention tanks do not have all the co-benefits of green infrastructure.

Disclose rainfall volume (in inches) that is being calculated for. The 1-inch rainfall captures the “average” storm; however, a stormwater management best practice is to design for larger than the average storms. The rainfall volume used in the analysis should be correlated with the volume of an average rainstorm in the Two Bridges neighborhood.

Solid Waste

In the analysis of the existing and future solid waste disposal practices, there should be a detailed examination of how the projects are in line with the Mayor’s Zero Waste by 2030 goals. For example, examine and review the research of Kiss+Cathcart architects which isolates the current high rise residential building design elements which impede the 2030 composting and recycling goals. Also reference the DSNY’s private hauling/carting feasibility study for franchised zones. Ascertain the current vehicle miles traveled by private carters in the neighborhood. Analyze the design scenarios (positioning of waste collection sites) that would facilitate the least impactful solid waste pick up.

Examine the potential for on-site biogas production through organics recovery. (This is a program promoted by both the SWMP and PlaNYC and could provide reduction in both greenhouse gasses and overall energy costs. This is a natural pathway considering that the E designation for site 5 requires that natural gas is the only fossil fuel used for on-site heating and water systems. Biogas generated on-site from recovered organics through anaerobic digestion could be used instead of purchasing new natural gas.)

Energy

Examine areas of alignment with LES Ready’s solar installation goals. Conduct an analysis of the area’s post Sandy (during blackout) emergency energy needs and assess potential for backup or alternative community energy generation on site.

THE EIS must include a more exact unit count (apartments/sizes/commercial spaces) is needed to estimate/quantify energy demand. The entire area below Delancey Street is underserved by the existing utility grid -- very often (except for Wall Street) there are brownouts during peak summer demand.

Examine the potential for energy to be produced on site, and the potential for reduced impact on the city’s electrical grid.

Mitigations

Mitigation should include upgrades to the electric transmission, distributed energy resources (DER) including Solar PV, Combined Heating and Power (CHP), fuel cells, and mass battery storage which will satisfy demand and avoid costly grid transmission cable upgrades.

Transportation

The conditions in Two Bridges area with regard to transportation, traffic, transit, pedestrian, pedestrian/vehicle safety, and parking are already rife with hazards that are worsened from a lack of enforcement and an absence of comprehensive local transit planning. The proposed developments will worsen these conditions during construction and after, unless the issues are examined and mitigations are put into place, beginning with the most egregious and potentially life-threatening conditions.

Traffic

The draft scope specifies that the traffic analysis will be performed for the weekday AM, Midday, and PM peak periods at 30 traffic intersections. Many hazardous traffic conditions in the neighborhood occur on weekends, emanating from the foot and vehicle traffic associated with Basketball City and the cruise boat launch. Tour buses drop off passengers at the intersection of South and Montgomery Streets. Traffic lines up behind the tour busses, or worse, goes around the tour busses and into the pathway of cruise ship and Basketball City patrons attempting to cross South Street to get to the waterfront. Traffic must be analyzed during several points throughout the weekend.

Traffic along South Street is also impacted by tour busses that park and/or idle along South Street between Montgomery and Rutgers and construction vehicles servicing the Extell site. Examine the impact of more construction vehicle traffic on this stressed area.

Cherry Street receives overflow traffic when the FDR is congested. Examine impacts of new projects on traffic flow under these conditions.

With regard to sanitation, currently, DOS picks up Lands End II waste from bins located in the parking lots facing South Street. As will be described later in this document, unauthorized parking and construction vehicle traffic compound congestion in the area along South Street. Examine impacts of additional sanitation pick up on traffic patterns and congestion, especially along South Street.

Transit

Again, transit impacts should also be examined on weekends when there are heavy volumes of non-resident users traveling to Basketball City and the Pier 36 dock.

Examine impact of adding an elevator at this station, especially given the influx of seniors. Closest elevator-served station is at Delancey.

In 2021, MTA is proposing to take off-line the F train (no definitive timeline how long repairs will take) to repair damages caused by Hurricane Sandy; coincidentally, this is around the same year when the trio of residential skyscrapers will bring an influx of resident commuters - need to examine impact and propose advance, alternative modes of transportation

Study bus ridership of the M-15 bus lines to schools in District 1. Increases in student ridership will exacerbate bus overcrowding.

Pedestrians (also see Senior section)

Examine the inclusion of crosswalks at Montgomery and Water Street as well as South St as a whole.

FDR (North/Southbound entrances) and South Street

Closely examine:

- High volume, dangerous/chaotic traffic intersection which needs to be closely studied for traffic flow and pedestrian safety improvements
- Congested traffic and pedestrian area is due to City Tour bus drops off their riders on corner of Montgomery/South St., Basketball City holds lots of major events that draws at least 700,000 people per (at times private buses are used to shuttle the people for private events - take up all South St parking spots) Pier 36 boat tour yields hundreds of people, etc...
- Need to add reflective road poles on South Street to distinctively define the edge of the curb and traffic lane - safety concern for bicyclists and pedestrians (it also aids anyone who are visually impaired)
- By Pier 35, there are about three active parking lots for Sanitation and EMT vehicles - most people don't know it's an active driveway since it's not clearly marked/defined.

Rutgers and Cherry Street

- Cross walks don't align
- Remove the dilapidated, rat infested corner green plant beds (on Rutgers/Cherry and Rutgers/Madison St) and install mid-section walkway to allow the influx of pedestrian foot traffic; will help align the cross walks
- On Rutgers/Madison - add back the additional parking spaces that was previously there but has not been removed

Consider realigning Rutgers Slip and reversing traffic patterns.

Vehicle/Pedestrian Safety

Examine impacts of vehicles turning into and out of the FDNY and DOS facilities.

Two-way bike lanes on one-way Clinton Street have proven dangerous for pedestrians accustomed to only looking one way before crossing. Consider improved signage or one-way bike lanes, and add bicycle flashing light signals.

Study the removal of the yellow fire chain to create a more open and inviting pathway to waterfront.

Parking

This is a huge problem and one that cannot be simply ignored or improperly studied. Scope egregiously fails to correctly identify available parking lots. The lot at the South St storage facility is closed and the one at Pier 42 is scheduled to close and convert to a public park.

Street parking is horrendous and all of the new proposals will require loading docks, which will further reduce spots. Huge, weekly events at Basketball City and Pier 36 exacerbate the problem. Tour buses, MTA buses, Intercity buses, Chinatown commuter vans all use the Two Bridges neighborhood's streets to layover and park. Additionally, because of current zoning, overnight commercial is allowed on the streets. No additional parking spots are proposed with these developments.

Mitigations

Consider adding new F-train entrance at the intersection of Madison and Rutgers. The sole entrance is poorly designed and the nearby curb is crumbling, leading to unsafe and congested conditions. Additionally, during morning rush hour, patrons line the sidewalk waiting service at a local bagel store and block the subway entrance and bus riders line the other side of the sidewalk as they wait for the bus. Because this entrance is closest to the proposed projects, it will be utilized to the point of being impassable.

Consider extending the M15 (Pike Cherry) bus line to run along South St. Consider a shuttle bus line along South St. that could circumference the neighborhood and connect to downtown.

Consider adding a ferry or water taxi stop at Pier 35 or 36 to help alleviate commuter traffic.

Consider regulations to eliminate commercial overnight parking.

Consider making all of South St parking for cars only with street cleaning regulations to help alleviate the parking crisis and control traffic coming off the FDR.

Consider issuing resident only parking permits with preference given to the existing buildings who do not have parking lots.

Air Quality, Greenhouse Gas and Climate Change

Air Quality and Greenhouse Gas

Provide an air quality baseline survey of all criteria pollutants (not just CO and PM) throughout the project site with monitors placed at street level, keeping in mind that health impacts of criteria air pollutants vary with seasons. This way the baseline is determined rather than selected. Pay particular attention to any areas frequented by children and the elderly. Monitors must remain in place during construction, be monitored daily, and reported weekly to community members in an accessible way. (Continuous monitoring exists in the Atlantic Yards MEC but is digested in an impossibly large appendix of quarterly reports and is not readily available to the public). Survey, monitoring, and analysis should include a focus on exposure of proposed new

residential units in development to pollutants from existing roadway (elevated FDR Drive) as well as air quality impacts of construction.

There is no mention of the site 5 E designation in this analysis. Reiterate here what was outlined in the initial project description concerning E designation requirements. This is especially puzzling because all analysis in this section concerns only CO and PM however the project description refers to NAAQS levels of NO_x. This should be addressed in the air quality analysis area, not simply mentioned briefly in the project description.

Additionally, section 321.1 refers to necessary air quality monitoring for projects that “could be affected by pollutants from roadways”. There is no mention in this section of analysis or monitoring/modeling of the elevated six lane highway adjacent to the project sites (FDR), unless the selection of appropriate CO and PM background levels are to include this.

The section on performing CO and PM analysis for site 5 should be sure to state clearly that it will be analyzing an enclosed parking facility.

Climate Change

The proposed projects must be in line with the Mayor’s current 80% GHG reduction by 2050. Details of this alignment should be included in the EIS. Provide detailed information regarding the design features and operational measures to reduce the proposed project’s energy use and GHG emissions. Detail all available GHG and energy reduction technologies.

Mitigations

The draft scope of work states that measures to reduce energy use and GHG emissions will be discussed and quantified to the extent that information is available. Detailed information is critical. There is potential for reduction in energy use using several distributed generation, cogeneration and/or anaerobic digesters for biogas production on-site. These technologies are promoted by, and implementation assistance is available through, NYSERDA. Additionally, coupling mitigation measures for storm water runoff with efforts to reduce energy use could have significant impacts on daily energy needs.

Green roofs and green walls for both towers along with “aquifer storage” of storm water below parking areas could provide consistent building cooling that would both lower energy costs (approx. \$17/day for ¼” of water evaporated over 220sq ft.)

Flood Resiliency

The project is in a Coastal Zone and must be assessed for consistency with the Waterfront Revitalization Plan (WRP) and must complete a WRP Consistency Form to address current and future flood hazards.

The EIS should include a full explanation of the numbers behind the “Future Flood Level” projections used in the Flood Elevation Worksheet. The life of a building should be 100 years and designing for flood projections of at least 2100 if not further (note the projections on the flood evaluation worksheet do not go out further than 2100).

Explanation of consistency with the WRP should specifically focus on:

Policy 4: Ecological Resources

Policy 5: Water Quality

Policy 6: Flooding & Erosion

Policy 6.2: Climate Change Adaptation

Policy 7: Hazardous Materials

Policy 8: Public Access

Public Health

The DEIS must fully examine the potential mental health impacts relating to displacement – both the fear of as well as actual displacement. Ensuring access to open space, safe walking and bicycle paths, clean air and water, affordable healthy food, adequate sewer and sanitation systems, safe and appropriate child care and education, safe and affordable housing, and lack of exposure to environmental contaminants combined with access to preventive and primary health care will protect and promote health in the current and future study area population. All of these concerns were raised at the community meetings and are addressed in detail in each of the relevant sections.

Neighborhood Character

Two Bridges is a waterfront neighborhood and while it retains some qualities of a waterfront neighborhood, such as abundant light and air, its connections to the waterfront are severely limited. The proposed developments will be an infringement on the benefits that Two Bridges accrues as a waterfront neighborhood. The proposed heights are dramatically inconsistent with existing neighborhood built form and will alter the physical aspects of neighborhood character, which while high rise only up to 27 stories whereas the new developments are anywhere from 2 - 3 times as tall.. The proposed developments also miss critical opportunities to help connect the community to the waterfront and bring on its full capacity as a waterfront neighborhood.

In addition to the physical changes, the impact on socio-economic factors needs to be considered; impacts on people of color, low-income families, immigrants, rent-stabilized and affordable housing, etc. is important. This section should re-iterate some of the material from the section on socio-economic conditions. Two Bridges's diversity—a neighborhood comprising a mix of races and ethnicities--and affordability give the neighborhood its character. The indirect displacement analysis should be used as a baseline for examining neighborhood character impacts.

Analysis should concentrate on:

Gentrification:

A housing study released in May, 2016 by NYU's Furman Center provides a perspective over time, between 1990 and 2014. Lower East Side / Chinatown average rents were 50 percent

higher in 2014 than in 1990, and non-family households increased by 56 percent, accompanied by a 21 percent increase in average household income. Between 2000 and 2014 the area showed an increase in whites (up 17 percent) and decreases in Blacks down by a third), Asians and Latinos (both down by a tenth) and a tripling of the proportion of college graduates. While the poverty rate decreased from 28 to 22 percent, low income severely rent-burdened households -- those paying more than 50 percent of their incomes for rent -- increased from 31 to 38 percent.

Non-family households in the Lower East Side / Chinatown area:

Non-family households now comprise more than half of all households – largely in the East Village.

Distortion of local housing market:

Ten percent of all Airbnb listings in NYC are located in the East Village/Lower East Side; Airbnb units account for seven percent of the rental housing stock in the neighborhood. A 2016 study of Airbnb impact on the rental market shows correlations between striking increases in average rents, gentrification and the presence of growing numbers of Airbnb units. Many Airbnb hosts have more than one reservation per month, or have multiple units they rent out. These rentals bring in monthly revenues that exceed the median monthly rental asking price, offering incentives to lease units through Airbnb, removing them from the available housing supply. This not only lowers the vacancy rate, but drives up surrounding rents as housing supply diminishes.

Consider the addition of the proposed new buildings following the recent surge of luxury housing and commercial development throughout the Lower East Side – for example:

- Essex Crossing. The nine-site Essex Crossing complex is emerging with phased construction through 2024. The development will bring new shops, community space, restaurants, a movie theater, a bowling alley, a museum, office space, a public park, a new Essex Street Market, and 1,000 units of housing. Half the apartments will be affordable to low, moderate and middle income New Yorkers. The first affordable housing lotteries are scheduled to begin in summer 2017. Tenants displaced from the razed buildings are supposed to receive priority in the apartment lottery; however, income requirements may deter the lowest income local residents from benefitting, and it will be difficult to locate the earlier tenants since they were displaced many decades ago.

In 2016, Site 6 broke ground for a mixed use residential, commercial and community space. Grand Street Settlement will be opening a new 138,000- square-foot intergenerational community center with innovative programming, and social venture café. The site will also include 100 affordable rental apartments for seniors, a medical facility leased by NYU Langone Medical Center, an outdoor garden and retail facilities.

- Leading the super-tall building trend, Extell Tower is selling \$1-\$3 million co-ops, initially targeting the high end Asian market.

- Other notable high end buildings are also rising further west and north – A seven story, 45-unit glass condominium at 150 Rivington Street, the corner site of the former Streit’s matzo factory, and an eleven-floor building next to Katz’s Deli on Houston at 196 Orchard; and Ian Schrager’s Public Hotel 28-story tower at 215 Chrystie Street.
- Lowline. The Lowline plans for an underground park won official City approval to proceed in July 2016, with their winning proposal to the MTA and Economic Development Corporation for use an abandoned trolley terminal under Delancey Street. Community Board 3 and other local residents and businesses have mixed opinions about the project, which is estimated to attract some one million visitors each year. Lessons from the Highline (the project’s counterpart built on abandoned train tracks in Chelsea) raise concerns about rising property values and rents – thus exacerbating gentrification – and limited community engagement in the plans.

Impact on seniors

The Two-Bridges neighborhood, one of the neighborhoods in New York City that has the highest percentage of seniors, provides varied culture-based functions and services to support seniors’ everyday life. However, there are obstacles and barriers that make it difficult for seniors to get to the destinations. For example, many Chinese seniors are used to shopping in a Chinese supermarket at the corner of East Broadway and Pike street, yet the below grade entrance poses difficulties. Some seniors like to sit and gather in Seward Park in the afternoon. Some jaywalk to get the shortcut to the entrance of the park. Some seniors prefer to walk to Chinatown to buy groceries but must contend with traffic signals that do not provide sufficient time to cross streets safely.

Existing conditions in the Two-Bridges area that limit seniors’ mobility:

- Lack of benches and seating areas on the sidewalks in commercial corridors such as East Broadway.
- Traffic lights fail to give the elderly enough time to cross the road.
- Barriers on sidewalks such as snow or rainwater in the curb, broken pavement, loading truck, etc.

With the proposed developments, there are some potential issues that might affect seniors’ life quality:

- Examine the indirect displacement of small pharmacies and other healthy services such as clinics, acupuncture services, which provide seniors’ healthy needs with reasonable price and language-barrier-free. Also examine impact of retail and community facility displacement due to rising rents on alternative/Eastern medical facilities, practitioners and herb stores within at least ½ mile that serve the both the general public but especially Chinese seniors – in particular those with linguistic challenges.
- Examine the indirect displacement of culture-based supermarkets and grocery stores, which are one of the important destinations for seniors, that might further discourage them to go outside and affect their both mental and physical health, and decrease the opportunities of connecting and socializing with other residents.

- Examine the capacity of public transit to adequately serve seniors as its use becomes more strained by new population.

Alternatives

The following scenarios each need to be thoroughly examined and described with the following additions and alternatives.

With Action

In addition to the proposed Action as described in the Draft Scope, the “With Action” scenario must examine the change to the developments and to impacts should mitigations (proposed in previous comments in each CEQR section) be implemented.

The *With Action Scenario* should include development and mitigations consistent with sub-district D in the *Plan for Chinatown and Surrounding Areas* (2014), should some aspects of the CWG plan be approved.

No Action

The No Action scenario must include the potential of adoption of community and public agency neighborhood and area wide (waterfront resiliency) plans for the larger study area as well as for the specific sites, such as the Big U and Pier 42 plans and the CWG Planned Special District Subdistrict D.

Also the No Action scenario must incorporate the possibility that certain Citywide legislation, such as the anti-harassment legislation may be adopted; the reform of the CEQR indirect displacement methodology the adoption of parts of the CWG Plan, which would address many of the impacts, and/or the possibility that developments (other than these proposed) could apply to build in the LSRD.

Alternative Actions

The DEIS should consider the CWG Plan subdistrict D as an alternative. The DEIS should review the findings and plans from the CWG Plan, released in 2013, and note where the development plans differ from what was proposed and widely accepted by this community.

The Alternative action should include the recommendations from the CWG Plan either in its entirety and/or as alternatives under each impact area. - For example the reduction in building heights; affordability tied to local incomes (AMI), an increase in the percentage of affordable housing from 25% to 50%, the calculation of the percentage of affordable housing based on square footage (after subtracting mechanicals and common areas) rather than on units, the provision and preservation of facilities, commercial space and cultural spaces that meet community needs; and the adoption of anti-harassment certification..

The Alternative Action should include specific mitigations of impacts identified through a reformed CEQRA methodology for determining indirect displacement impacts. (see the earlier comments on indirect displacement).

In addition, all three scenarios should review and incorporate suggestions from Lower East Side community groups already confronting displacement and loss of neighborhood character. The Coalition to Protect Chinatown and Lower East Side, and the Seward Park Area Redevelopment Coalition join Coalition Against Anti-Asian Violence (CAAV), GOLES, Cooper Square and other longtime housing activists have been packing local meetings and demonstrations and developing proactive strategies to negotiate with the City to protect and advance inclusive affordable housing and neighborhood preservation goals.

Mitigation

The DEIS must examine mitigations that are identified in the comments on the relevant CEQR impact area. In addition, the DEIS must identify specific mitigations that address impacts disclosed as a result of the proposed changes and/or additions to the draft scope of work.

For example, efforts at mitigating secondary displacement must be more substantive than providing 25 % of the units at undisclosed “affordable” rents.

GROWTH-INDUCING ASPECTS OF THE PROPOSED PROJECTS

This section should include more detail, especially in the identification of sites such as the Edison Storage and other soft sites - see CWG study identification of soft sites in the larger study area that would be more likely to respond to increased market values and to propose larger and/or more expensive rent or ownership developments. In addition, the influx of such a large number of residents with higher incomes will increase the demand for additional higher priced products and services.

APPENDICES

For historic/cultural resources

(from WRP documents): The WRP establishes a set of ten policy categories for the development and use of the waterfront. ... When a proposed local, state, or federal project or discretionary action is located within the Coastal Zone or is likely to affect the policies of the Coastal Zone, a determination of the activity’s consistency with the coastal policies contained in the WRP must be made before the action or project can move forward. These ten policies provide a framework for evaluating the consistency of activities in the Coastal Zone with the WRP’s goals for waterfront development. Each policy category contains policies and sub-

policies, which provide additional considerations that should be assessed during consistency review.

Among these, relevant for this Historic/Cultural section of the EIS, are:

Policy 1: Residential and Commercial Redevelopment: Support and facilitate commercial and residential redevelopment in areas well-suited to such development.

Policy 8: Public Access: Provide public access to, from, and along New York City's coastal waters

Policy 9: Scenic Resources: Protect scenic resources that contribute to the visual quality of the New York City coastal area

Policy 10: Historic and Cultural Resources: Protect, preserve and enhance resources significant to the historical, archaeological, architectural, and cultural legacy of the New York City coastal area

EXAMPLES From City Lore and Municipal Art Society's Census of Places that Matter (some of the open green spaces added)

Garden Cafeteria (former, now Wing Shoon Restaurant,
Jewish Daily Forward Building (former)

Educational Alliance – community center

MAP From Chinatown Working Group Final Report (p.49)

MAP From Chinatown Working Group Final Report (p.42)

Neighborhood use and local culture:

The East River Park and waterfront linked to the proposed sites offer vital community recreation resources. Current uses such as early morning tai-chi and sword dances, playground access for children attending local daycare centers, fishing in the river, toddler sprinkler park, a walking meditation labyrinth, soccer, football and baseball fields, outdoor amphitheater, bike paths, jogging and walking with stunning city/river views. Access to the park and waterfront could be jeopardized by the developments. [Participants in Karp Consultant-led Community Meeting #1 expressed concern about accessing the waterfront, and in particular, doing so through the new building at 260 South Street.] The EIS should take into consideration the impact on park/waterfront access (and use/crowding) within the context of both current use and the emerging developments of The East River Waterfront Esplanade and Piers Project planned in 2002 and, modified by recent coastal resilience efforts, within the larger Waterfront Revitalization Plan.

One aspect of the East River Waterfront project seems particularly germane to the Two Bridges site, and should be explored within the EIS: The proposed Slip and Pier projects, the Catherine Slip and Pike / Allen Street pathway will also impact the EIS area adding much more foot and bike traffic, and related developments.

For urban design and visual resources

(from WRP documents): The WRP establishes a set of ten policy categories for the development and use of the waterfront. ... Among these, directly relevant for this Urban Design section of the EIS, are:

Policy 8: Public Access: Provide public access to, from, and along New York City's coastal waters

Policy 9: Scenic Resources: Protect scenic resources that contribute to the visual quality of the New York City coastal area

WATERFRONT ESPLANADE PLAN

The New York City Economic Development Corporation's East River Waterfront Esplanade Plan includes a proposal to turn much of the waterfront into high-end developments. In response to this plan,

community members collaborated to create the Paths to Pier 42 plan that had a different vision for Pier

42. The Lower East Side Waterfront Alliance envisioned an urban beach and docking point for boaters

and kayakers. In January of 2014, the \$94 million project was approved by the CB3 subcommittee and

has yet to be approved by the larger CB3 and Public Design Commission. The plan will remove the existing shed and build a bike path, lawns, playground, and waterfront marshes.

In the interim, Pier 42 is being used as a new park space for art, design, and educational installations. These events are intended to encourage use of the public pier and build community. The timeline for permanent changes to be made to Pier 42 has not been determined.

Testimony of Trever Holland, President of the Two Bridges Tower Resident Association to the Department of City Planning.

Public Scoping Meeting

CEQR No. 17DCP148 (Two Bridges LSRD)

Good Evening,

My name is Trever Holland and I have been a resident of 82 Rutgers Slip for almost 20 years. I am the President of the Two Bridges Tower Resident Association, board member of TUFF-LES and affiliated with a variety of other community and civic groups

I want to thank the Environmental Assessment and Review Division of the NYC Department of City Planning for the opportunity to speak on The Two Bridges Draft EIS.

However, this is not proper city planning.

First, I want to echo and support many of the comments from my Two Bridges neighbors, Community Board 3, our elected officials, GOLES and the team of experts from the City and Regional Planning Program at Pratt Institute who graciously provided pro-bono technical support for our local residents.

I have several points that I would like to emphasize from my more detailed written testimony that I will provide at a later time.

- Have you seen the two-block area that is slated to receive more than 4200 apartment units? The proposed new units total more than Hudson Yards and is more than 4 times the amount of Essex Crossing. The EIS must look at this as a “new neighborhood” and include all potentially developable soft sites including Rutgers Housing, LaGuardia Housing and the storage location on South

Street. The EIS must also look at the remaining local “air rights”, which surprisingly, there is still quite a bit left.

- All of the buildings in The Two Bridges LSRD were developed as affordable apartments. Every single one. The EIS must call for a full description and the rationale as to why the original intent of providing low, moderate and middle-income housing is not being followed.
- All of the proposed buildings either go on top of, cantilever over, or sit directly next to existing affordable housing. All of the proposed buildings eliminate valuable light, air and space. All of you are city planners—you want to tell me that with all of your expertise, you actually endorse these designs? The Draft scope needs to examine the effect on the current affordable buildings within the LSRD.

The draft scope also needs to take into account the continuing construction of the waterfront esplanade and pier projects, the Lower Manhattan Coastal Resiliency Project, The East Side Coastal Resiliency Project and the proposed 500 unit, 35 story NYCHA next gen at La Guardia. All of this happening within a span of a few blocks and with similar completion dates.

The senior building at 80 Rutgers.

Earlier we heard testimony from Little Cherry.

City planning, Dept. of Buildings or whoever, needs to figure out that particular situation before we continue with this EIS.

Otherwise, what are we reviewing? Additionally, the EIS needs to look at senior displacement and answer the question of “what

happens when a 90 year old senior says no, you are not evicting me from my home”.

The draft scope should also address the effect on our skyline. This is our iconic skyline. Don't we all share a responsibility for something so visible? We have already seen Extell's effect on the Manhattan Bridge

82 Rutgers Slip, the building I currently in, saw 135 evictions cases from 2013-2015. My building only has 198 units! That's an eviction rate of almost 70%! The highest in all of NYC! It must also be noted that the property owner for 82 Rutgers is also co-developing the 100-story cantilever supertall that sits above the senior building.

The Draft scope must address secondary displacement to capture and address this data.

Two Bridges suffers dearly from a lack of open space.

The draft scope should consider mitigation of using the parking lot at the FDNY/EMS/DOS stations under the FDR as additional open space and using the rooftops as possible convertible open space areas.

Consider mitigation of adding play areas for children in the waterfront esplanade area as none exists now.

And consider mitigation of relocating the FDNY/EMS/DOS stations under to FDR to other city owned property to allow for more open space.

Two Bridges has a parking and transportation crisis.

The draft scope cannot be simply ignore or improperly study the area.

The scope egregiously fails to correctly identify available parking lots. The lot at the South St storage facility is closed and the one at Pier 42 is scheduled to close and convert to a public park. Street parking is horrendous and all of the new proposals will require loading docks, which will further reduce spots. Huge, weekly events at Basketball City and Pier 36 exacerbate the problem. Tour buses, MTA buses, Intercity buses, Chinatown commuter vans all use the Two Bridges neighborhood's streets to layover and park.

No additional parking spots are proposed with these developments.

Mitigations

Consider adding new F-train entrance at the intersection of Madison and Rutgers. The sole entrance is poorly designed and the nearby curb is crumbling, leading to unsafe and congested conditions. Additionally, during morning rush hour, patrons line the sidewalk waiting service at a local bagel store and block the subway entrance and bus riders line the other side of the sidewalk as they wait for the bus. Because this entrance is closest to the proposed projects, it will be utilized to the point of being impassable.

Consider extending the M15 (Pike Cherry) bus line to run along South St.

Consider a shuttle bus line along South St. that could circumference the neighborhood and connect to downtown.

Consider adding a ferry or water taxi stop at Pier 35 or 36 to help alleviate commuter traffic.

Consider making all of South St parking for cars only with street cleaning regulations to help alleviate the parking crisis and control traffic coming off the FDR.

Consider regulations to eliminate commercial overnight parking.

Consider issuing resident only parking permits with preference given to the existing buildings who do not have parking lots.

Thank you for this opportunity to provide testimony. I hope that my concerns voiced here today are addressed prior to certifying the Draft EIS.

Robert Dobruskin, Director
New York City Department of City Planning
Environmental Assessment Review Division
120 Broadway 31st Floor
New York, NY 10271

Grace Mak
Board Member of Two Bridges Tower Tenant Association
Board Member of Tenants United Fighting for Lower East Side (TUFF-LES)
82 Rutgers Slip # 15J
New York, NY 10002

Date: 5/25/2017

Dear Mr. Dobruskin,

The following details are my comments on the Draft Scope of Work (“Scope”) for the Draft Environmental Impact Statement (“DEIS”) that will study the environmental impacts for the Two Bridges Large Scale Residential Development Plan (LSRD).

Social economics

I like to voice my great concerns for my dear neighbors, the seniors, who live next door at 80 Rutgers Slip for almost 30 years since it was first built in 1987. All of these seniors have made 80 Rutgers Slip their permanent, peaceful retirement home. Their peaceful, quiet, comfortable, prosperous, quality of life that these seniors have enjoyed all these years, will soon be abruptly eradicated and temporarily displaced because a big time developer, JDS wants to build a 79 story / 1,008 sq. ft. tall building, cantilevering over their home. One of the seniors at 80 Rutgers, Mr. Jacque Goode strongly opposes this development project and blatantly said “They are putting a building on the top of my head.” This type of proposed development is disheartening, unethical, unjustifiable, and it’s dehumanizing treatment towards our most vulnerable senior residents in terms of jeopardizing their housing, health, safety, and their quality of life, in unequal exchange to build 495 luxury market rate units and a measly 165 affordable apartments. Our vulnerable seniors (many with serious health conditions and/or are immobile) deserve to be treated honorably, respectfully, with compassion and be allow to live out their full term of retirement life peacefully in the comfort of their permanent homes. As

a community, we intend to help protect and strongly advocate against developers who want to displace, harass, evict or relocate vulnerable residents (seniors and non-English speaking residents) from their homes. These developers would stop at nothing in order to make a nice, big marginal profit by building these super tall, non-contextual towers in the backyard of our beloved community. The sky is no limit for them.

- There is already a senior housing crisis and with the JDS project, it doesn't make sense to permanently eliminate or vacate 10 – 19 viable senior housing units; while the city should be seeking to develop more reasonable, affordable, low income housing for seniors.
- We ask for full disclosure and transparency of 10 – 19 units relocation plans for senior residents at 80 Rutgers Slip, including how relocation or supplement costs will be worked out for those residents, the period of time span they'll be relocated, what other type of commendations would be made for them.
- **Indirect Displacement** – study area for secondary displacement needs to be extended a half-mile radius and mapped out to include adjacent Manhattan neighborhoods of Chinatown and Lower East Side, up to Delancey Street and any particular sections that are predominantly Latino and Asian.
- You need to pull data from Census, RPAD, current real estate market data that links more directly with potential displacement of vulnerable population. Also, include eviction, foreclosure data for the past five years, building and alteration permits, demolition permits, complaints of landlord harassment, an inventory of currently regulated building stock that will soon expire, all subsidized, rent regulated and or stabilized apartments, an inventory request log for Right to Counsel, and interviews with local housing groups who counsel tenants who were subject to harassment, discrimination and displacement.
In analysis, evaluate the impact of local residents who are losing their preferential rents in subsidized housing, and their ability to find financially equivalent housing rent in the area.

Community Facilities and Services

Our community contests the draft scope in which it denotes that detailed analysis are not needed for fire and police services. The number of units for all these newly proposed projects that are being built like NYCHA in-fill for LaGuardia Houses, Extell, 2 towers on former Bialystoker Nursing Home, a senior housing facility at 30 Pike Street, Essex Crossing, does constitute a "sizable new neighborhood where none existed before." The community residents strongly feel that these community services such as

the police, mail service and post office are already overtaxed. Civil services such as police, fire, postal, EMT and sanitation must be scrupulously reviewed.

Schools

My oldest daughter currently attends the sixth grade in P.S.184 Shuang Wen, which is two and a half blocks from where we live. She attended this school since Kindergarten; meanwhile my son is currently in Kindergarten and in two years, I intend to enroll my youngest daughter into their full day Pre-K program. However, I'm very concern that there might not be a slot available for her because with these three new developments (including Extell, NYCHA NextGen), it will bring an increase of residents or families with kids that accelerate the enrollment rate and waiting list.

P.S. 184 is a dual language District 1 school with a total student body of 671 students. This is the only school in the neighborhood that serves Pre-K to 8th grade. 70% of student population comprises of Asian. Many students transfer in from other District 1 schools at 6th grade. Numerous families from outside the area send their children to this school in order to take advantage of the dual language, daily instruction. This is a fact that will not be automatically picked up when examining local neighborhood need. With 671 students, there is no proper designated gymnasium. The school's cramped auditorium serves as a dual gymnasium which parents and anyone who attended the CEM # 2 meeting can attest to how inadequate the space is, which could only accommodate a limited amount of people (standing room only).

Examine the impacts of overcrowding, lack of recreational and classroom space in PS 184; especially since universal pre-K is moving to full day. In addition, examine the need of expanding or building out additional classrooms, auditorium space and constructing a separate, fully equipped gymnasium space.

The need to increase school seats should be examined, not just by increases that attain the 5% threshold point, but also on local schools being near or at 100% capacity should be focused on.

Elementary and intermediate school in "sub-district" should include student performance level data, enrollment, waiting list and capacity. If schools in the "sub-district" are deemed to be at or near capacity, then a closer examination of the schools in the entire district needs to be probed.

Since there are several new development projects under construction or proposed in the vicinity such as Extell, Essex Crossing, La Guardia Houses (NextGen); these projects will stimulate an increase demand for the school seats and needs to be accounted for in the analysis. Determine whether there are any schools in the Two Bridges area that are under construction or in the planning stage. If none, then community residents suggest that developers should commit to provide a new school as mitigation.

Child Care Facilities

The current wait list should be included in child care analysis and if there are any new facilities under construction or planning stages. A new child care facility may be needed depending on location and the number of new slots anticipated as a result of these projects. Affordability of new childcare resources needs to be weighted carefully as it impacts the availability of this required resource for low income residents (especially for local Section 8 residents and NYCHA residents).

After School programs

Look into all the after school programs within the study area to determine whether they would be able to handle the increase school age population. At P.S. 184, there are three on-site after school programs and is most likely to be overcome with the new population – need to examine the impacts on these programs and the school budgets, if it is merited that new afterschool programs will be needed.

Libraries

Seward Park Library is the closest neighborhood library in this area. Examine whether the facility is adequate to handle increased population from these newly proposed housing projects. There is already overcrowding which people need to wait to use the computers, check-in/check-out materials, and there is limited space for seating and tables. Community residents suggest a need for an additional library.

Senior Centers and Services

There are proposed state budget cuts that already impact the amount of senior services that is being provided, along with the strain or lack of local medical facilities which is critical to the elderly. The proposed projects calls for 200 new units for seniors for site 5 and site 6 (there is also a new proposed project of 100 senior units at 30 Pike Street), so you need to examine the capacity for local

hospitals, health and recreational facilities due to the significant increase in the senior population in this area.

Shadows

Our community residents have sun-light sensitive concerns because these super tall towers (including Extell) will block our direct sunlight needs in *Public Open Space Parks*: like Coleman Playground/ Baseball Field/Skate Park, 265 and 275 private/open Playground space, Cherry/Clinton Playground, NYCHA Rutgers and La Guardia Playground, Little Flower Playground, P.S 184 schoolyard, Pier 35 and Pier 36 landscape and waterfront, Greenways on Pike St, Rutgers St, Montgomery St. and our Plaza walkway by 227 Cherry St.

Architectural Resources: Manhattan Bridge and the bridge's architectural archway on Cherry and Pike St.

Natural Resources: surface water bodies, wetland resources, sensitive or designated resources like coastal fish and wildlife habitats.

We like for you to conduct a cumulative impact analysis on ground shadows cast by these proposed structures (including Extell's project) at all times of the year and throughout the full day. Analysis may be done only for a specific date such as December 21st (Winter Solstice). But shadows cast will change or shift as the seasons change.

Transportation

Our Two Bridges area is rampant with hazard traffic, transit, pedestrian/vehicle safety and parking conditions that are aggravated from the lack of enforcement and the absence of sensible local transit planning. These proposed developments will intensify these conditions during and after construction, unless these issues carefully examined and mitigations are implemented.

Traffic

In your traffic analysis you need to perform several weekend AM, Midday and PM peak periods at several points (especially at the intersection of Montgomery and South St). Hazardous, weekend traffic conditions in the neighborhood are stemmed from the connection with overwhelming public and private Basketball City events , NY Party Cruise and "Go New York Tour" launch by Pier 36. In addition, there are tour buses that drop off passengers at the intersection of South and Montgomery Streets. The tour buses that are park and/or idle along South Street by Montgomery negatively impacts the traffic and safety of pedestrians and other moving vehicles. We also have to deal with construction

vehicles working on Extell's site which often either makes illegal K turn or blocks off traffic. Examine the impact of more construction vehicle traffic on this strained area. Also when the FDR is congested, it would trickle upward to Cherry Street which would be overflowed with traffic. Look at the impacts of these new projects on traffic flow and patterns under these conditions.

Transit

Weekend transit surveys should be examined when there are heavy volumes of non-resident users traveling to Basketball City events and the cruise ships dock.

Examine the hazardous conditions of current F-train entrance on Madison and Rutgers. Subway entrance is poorly designed because it is less than a foot from the local bagel/bodega's doorway, which creates a public safety and congestion issues and it's too close in proximity to the bus stop, as long lines of bus riders wait for the bus.

Consider adding new F-train entrance at the intersection of Madison and Rutgers because this entrance is the closest to all the proposed projects and it will be highly utilized to the point of being impassable.

Also examine the impact of adding an elevator at this Madison and Rutgers station due to the influx of seniors in this area. The closest elevator station is Delancey.

Consider the following improvements for East Broadway station:

- installing more turnstiles – currently, there is three turnstiles and at least one constantly breaks down
- adding an additional train (we only have the F train) to run the same route in order service the increase commuter population in this area and the other heavily, populated lower east side neighborhoods like Delancey Street, 2nd Ave. Houston St, etc..
- widen the East Broadway subway platform area by removing a handful of unused, locked staircases
- East Broadway subway station desperately needs a complete overall in terms of remodeling because of the lack of maintenace, depilated conditions like leaky, rusty ceilings; big cracks in the tiled walls; piles of sewage in the locked stairways and on the tracks, etc.

In 2021, MTA is proposing to take off-line the F train (with no definitive time-line on how long repairs will take) to repair damages caused by Hurricane Sandy; coincidentally, this is the around the same year when the trio of residential skyscrapers will bring an influx of resident commuters – need to examine the impact and propose advance, alternatives modes of transportation. Preplanned mitigation would be to designate a M-15 Select bus stop on the corner of Pike and Madison Street to serve significant, increase of resident commuters in this area.

Study bus ridership of the M-15 bus lines for schools in District 1 (ie. compile the number of bus metro cards distributed in District 1 schools).

Pedestrians

Examine the crosswalks, adjoining Montgomery and Water Street.

FDR (North/Southbound entrances) and South Street

Closely examine:

- High volume, dangerous/chaotic traffic intersection which needs to be meticulously studied for traffic flow and pedestrian safety improvements
- Congested traffic and pedestrian area is due to City Tour bus drops off their riders on corners of Montgomery/South St., Basketball City holds lots of major events that draws hundreds of attendees (at times private buses are used to shuttle the people for private events; these buses take up all the South St. parking spots). Pier 36 boat tours and party boats yields hundreds of tourist/non-resident users, etc....
- Need to add reflective road poles on South Street to distinctively define the edge of the curb and traffic lane – public safety concern for bicyclists, pedestrians and motorists (it also aids anyone who are visually impaired)
- By Pier 35, there are three active parking lots for Sanitation and EMT vehicles – most people don't know it's an active driveway since it's not clearly marked or defined. Also examine impacts of vehicles turning into and out of the FDNY and Dept. of Sanitation facilities.

Rutgers and Cherry Street

- Cross walks don't align
- Remove the dilapidated, rat infested corner green plant beds (on Rutgers/Cherry and Rutgers/Madison) to install a mid-section section

walkway to allow the influx of pedestrian foot traffic; will help align the cross walks

- On Rutgers/Madison Street – add back the additional parking spaces that was previously there but has been removed when they repaired Rutgers Street

Clinton Street

The two-way bike lanes on a one-way Clinton Street have proven dangerous for pedestrians (especially kids and seniors) who are accustomed to looking only one way before crossing.

- Remove bike lane from Clinton/Cherry to Clinton/South Street because of public safety reasons since it's by P.S. 184 school and Clinton/Cherry Street playground. Also site 6 proposed tower will have 100 senior units.
- Consider improved signage or one-way bike lanes, and add bicycle flashing light signals along Clinton Street

Parking

For the Parking study area, you should keep it to the ¼ mile study area radius because this clearly enhances the fact that there is a lack and scarcity of parking lots and spaces in our neighborhood area, which is only going to worsen during and after construction.

- Examine South Street – get rid of overnight tour bus and commercial parking and change it to personal vehicle parking on Sunday to Saturday.
- Consider eliminating the two-way bike lane from Clinton/South Street to Clinton/Henry St. because it proposes public, crossing safety issue since it's there are several public schools, several playgrounds and Governor Hospital in this area. Convert the two-way bike lane to alternate side parking on these streets instead.
- Examine why there are at least twenty-five personal vehicles parked on a locked PS 184 Shuang Wen school playground on Saturday, April 22? Explained who authorized this, whose cars do they belong to and whether this is a reoccurring issue?

Land Use, Zoning, and Public Policy

A quarter-mile study area is inadequate for an examination of neighborhood impacts. The study area should be increased to at least a half-mile radius, to include other portions of the neighborhood most likely to be impacted as well as adjacent areas that

will have new developments, extending north to Delancey Street. An irregular study area is possible, given that most of the impacts will be felt in the adjacent Manhattan neighborhoods, and not in the East River or in Brooklyn.

Examine sea-level rise as a major factor influencing land use trends. The area lies in Category 1 Hurricane Storm Surge Area and in Evacuation Zone A. The magnitude of these residential developments must be examined in relation to vulnerability, disaster preparedness, mitigation and the ability of front-line responders to rescue families to safety in a Sandy-like situation.

Although the joint EIS for the three Two Bridges projects is an initial good start in terms of examining cumulative impacts, there are multiple as-of-right projects (such as Extell, NYCHA in-fill at La Guardia Houses, 30 Pike Street, etc..) that will also substantially add to neighborhood's density, infrastructure capacity, and need for local service – the impacts from these projects should also be examined in a similar and cumulative manner.

Alternatives

Study a lower-scale alternative that adds additional housing and affordable housing above the no action future, but it needs to be more in scale with the surrounding neighborhood. It may be modeled after Chinatown Working Group plan.

An alternative scenario for site 4 proposed project on 227 Cherry St - instead of building 1,008 sq. ft building, consider building a two-three story high retail which needs to include a full service supermarket that is lacking in this community or is a big void in this area.

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director
Office of City Planning
120 Broadway, New York, NY 10271
May 25th, 2017

RE: Comments on the Two Bridges LSRD
CEQR #: 17DCP 148M

The Dept. Of City Planning (DPC) is overseeing an Environmental Impact Analysis for construction of a Megatower Group in the Two Bridges Large Scale Residential Development (LSRD). The following comments are provided regarding the Scope of the environmental analysis to be performed:

- The Megatower Group Project requires special permits, special permit modifications, and/or authorizations under NYC Zoning Resolution, Article VII, Chapter 8 (ZR) to build in the LSRD. Redistribution of bulk and open space, increases to the maximum developable floor area and lot coverage, wholesale restrictions on air and light access, and total alteration of neighborhood character must be separately studied under applicable provisions and procedures of the ZR
- ZR § 78-313 requires the CPC to issue affirmative "Findings" that Megatower Group authorizations and/or special permits under ZR § § 78-311 or 78-312 won't interfere with neighborhood character, restrict air and light access or privacy, introduce detrimental building bulk, or create traffic congestion
- The Draft Scope of Work and EIS must treat affected Public Housing and the occupants as sun-light-sensitive resources in its "Shadow" assessment, and the EIS shadow impacts identified must meet the standards of ZR § 78-313 and show no adverse effects to light and air at adjacent properties
- The Draft Scope of Work and EIS must assess: systemic overload of the infrastructure, pumping, flow, flow control, treatment, and discharge capacities of the entire Newtown Creek drainage basin (Lower Manhattan to 14th Street on the West Side, to 71st Street on the East Side); possible interference with achieving compliance with pending Administrative and Consent Orders issued to the City of New York for violations of Federal and State water pollution laws; and interference with Impaired Water De-listing of the Newtown Creek pursuant to the Federal Clean Water Act from constructing and operating the three proposed megatowers in the LSRD
- The DSOW must assess valid Alternatives to the Proposed Action
- The DSOW must assess Cumulative Impacts from the Proposed Action, especially those created by multiple large scale developments in lower Manhattan
- The DSOW must include Involved Parties: USEPA, NYSDEC, NYCDEP, US HUD, and FEMA

Carolina Owens. Owens / (Yanahumara1@gmail.com) ^{more other side} →

L E S O N
L O W E R E A S T S I D E
O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

May 25, 2016

Re: Comments on the Two Bridges LSRD

CEQR No. 17DCP148M

纽约市城市规划局负责对“两桥大型居住区”（“大型居住区”）的大型高楼的建造项目进行环境影响分析。我们对环境影响分析的范围作出以下评论：

- 大型高楼项目要在大型居住区建造，需要取得特殊许可、特殊许可修改意见或根据纽约市土地决议（“决议”）第 8 章第 VII 条所作的批准。如项目有对建筑体积和户外空间的再分配、对可发展的建筑面积和场地范围的最大增加、对空气和光线的大量限制和对邻里特色的完全改变，必须根据决议的相关条例和程序分别进行研究。
- 决议的 § 78-313 要求城市规划委员会在根据决议 § § 78-311 或 78-312 给予大型高楼项目批准或特殊许可时，需得出肯定的调查结果，证明项目不会改变邻里特色、限制空气和光线、产生带破坏性的建筑部分和制造交通堵塞。
- 工作范围草案和环境影响分析在“阴影”部分中，必须把政府楼及其住户当成对阳光敏感的资源来对待，并且在环境影响分析中的阴影影响必须符合决议的 § 78-313 的标准，要证明对附近物业的光线和空气没有负面影响。
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签名：

1) Justa BARRIOS

2) ALVARO RAMIRO

3) ALVARO RAMIRO

more other side

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director
Office of City Planning
120 Broadway, New York, NY 10271
May 25th, 2017

RE: Comments on the Two Bridges LSRD
CEQR #: 17DCP 148M

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An allpe [signature] . *Clida A [signature]*

more other side
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L E S O N
L O W E R E A S T S I D E
O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

May 25, 2016

Re: Comments on the Two Bridges LSRD

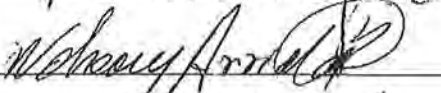
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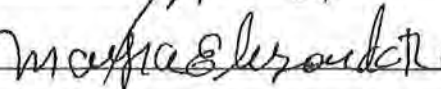
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签名：

1)  SUSAN MEYER

2) 

3) 

more other side →

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director
Office of City Planning
120 Broadway, New York, NY 10271
May 25th, 2017

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John C.

Gonzalo Cruz

*more other
side →*

L E S O N
L O W E R E A S T S I D E
O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

May 25, 2016

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签名：

1) SUSAN WERSAN Susan Wersan

2) Alan Beutz-Letts Alan Beutz-Letts

3) Gonzalo Cruz Glenn CF

more other side
→

LESON

Lower East Side Organized Neighbors

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120 Broadway, New York, NY 10271
May 25th, 2017

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Carlos Herrera

more other side
→

L E S O N
L O W E R E A S T S I D E
O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director
Office of City Planning
120 Broadway, New York, N.Y. 10271
May 25, 2016

Re: Comments on the Two Bridges LSRD
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签名：

1) Domingo Teofilo 
2) Joy Gramolini 
3) Reera Aron 

more other
side →

LESON

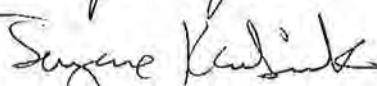
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Sarah Ahn 
Suzanne Kacelnick  

more other
side →

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O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

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签名:

1) JUANA GUEVARA

2) _____

3) _____

more other
side →

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120 Broadway, New York, NY 10271
May 25th, 2017

RE: Comments on the Two Bridges LSRD
CEQR #: 17DCP 148M

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O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

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签名：

1) Katia Lormenka

2) 

3) _____

LESON

Lower East Side Organized Neighbors

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签名：

1)

Jusselia Molera Jusselia Molera

2)

Tana Finester

3)

Amanda Binsford

LESON

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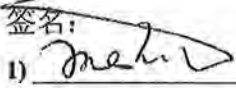
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签名：

1)

2)

3)

 Meihwa Chow

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签名：

1) Sachi Suria-Linasos

2) Ilya Geller

3) David Ureña

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签名：

- 1) Salma Latif Selar
- 2) Anjuman Begum (Khuki) Anj
- 3) SHAHENSHA BEGUM ShahenSha Begum

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director

Office of City Planning

120 Broadway, New York, NY 10271

May 25th, 2017

RE: Comments on the Two Bridges LSRD

CEQR #: 17DCP 148M

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签名：

1)  陳麗儀

2) 

3) 

LESON

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签名：

1) Ren Zing Huang

2) Rui Xiang Pan

3) Cheng Sheng

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2) Wen Xun Shi

3) Mei Ting Wang

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签名: Yue Chang Zhou

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3) Su Lan Zhou

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Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

May 25, 2016


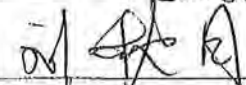

Re: Comments on the Two Bridges LSRD

CEQR No. 17DCP148M

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签名：

- 1)  YAN QIZHI
- 2)  QIN YUE LI
- 3)  JIANG JIE CHEN

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director

Office of City Planning

120 Broadway, New York, NY 10271

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签名：

- 1) Olana Zou
- 2) Chang Kunai Zou
- 3) Mei Long Zou

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签名：

1) Liao Wen Chen

2) Feng Hui Lin

3) Danie Lin

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签名：

1)

LING QUNXILING

2)

Sen Kip Ch

3)

Chen Kit Ch

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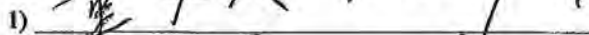
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签名: 董宇天 DOMG YI

1) 

2) 

3) 

S/25-26/17

L E S S O N
L O W E R E A S T S I D E
O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

May 25, 2016

Re: Comments on the Two Bridges LSRD

CEQR No. 17DCP148M

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签名:

1) 马星^② 刘华^③ 黄文

2) 岑平国^④ 陈^⑤

3) 譚仔^⑥ THOM YEE

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director
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签名:

1) ① 陈永球, ② 潘明仁, ③ 朱小利

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签名：

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 4) Wai Fong Kwong 5) Wong Chung
 6) [Signature]
 7) [Signature]

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LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director

Office of City Planning

120 Broadway, New York, NY 10271

May 25th, 2017

RE: Comments on the Two Bridges LSRD

CEQR #: 17DCP 148M

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Name/ Address	Name/ Address
Dasha Imperiale	131 Broome St #23A NY NY 10002
Tammy Arendol	131 Broome St Apt 12E NY, NY 10002
Erika Arendol	131 Broome St Apt 12E NY, NY 10002
Robert Ferrer	175 Clinton St. NY, NY 10002
Nancy Pao	410 Grand St
Branka Sonera	410 Grand St
Angela Ferrer	460 Grand St
Nesha Jones	131 Broome St 2HC
WAR Rottalcom	131 Broome St. 12A NYC 10002
Judy Lopez	131 Broome St #4A NY NY 10002
Marcelo Callesse	460 - Grand St NY 10002
Carolina Masny	460 Grand St NY 10002
Carmel Garcia	154 Broome St
Caenan Mats	410 Grand St
Laureen Cipriello	118 Ave D #2H
Rosita Reyes	410 Grand St #14B. NY, NY, 10002
Orlando Villagomez	410 CRAWLE ST NY 10002
Eric Cruz	460 Grand St #8B
Jaqueline Mitchell	131 Broome St #4H
Barbara Williams	460 Grand St #10B
Kim Fung	131 Broome St #24A
Maha Anton	131 Broome St #24C

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Name/ Address	Name/ Address
Daouda Taylor 131 broome st	New York, NY 10002
Antonio Grey Lin 82 Rutgers St, NY, NY	10002
David News 64 Essex St #169	NY 10002
Jose Alford	460 GRAND ST 10002
Rosa Rodriguez	131 Broome St 23B 10002
Carlos Motilo	131 Broom St
Deborah Ramirez	410 Grand Street
Elba I Burgos	131 Broome st
Damien Ramirez	131 Broome street
Esther Torres	131 Broome st
Juanita Nunez F.	131 Broome St
Rosa H. Nunez F.	131 Broome St
Victor Ramirez	161 Allen ^s 175 Eldridge ^s 3-H
Samuel Martinez	90 BARUCH drive
Naomi Peña	460 Grand St. #14B, NY NY 10002
Israel Cruz 131 Broome st #46	131 Broome st #46 NY NY 10002

L E S O N
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O R G A N I Z E D N E I G H B O R S

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签名：ZHANG MMVA

1) _____

2) Wai Hung Lam _____

3) _____

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签名：

1) Miao Xian Li

2) Jail yan

3) Jiang Jiao zhong

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签名：

1) JIN FEN LI

2) Alan Lin Che

3) Hui Jing Chen

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- 工作范围草案必须评估拟定行动的累积影响，尤其是因为在曼哈顿下城建造的数个大型发展项目而造成的影响。
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签名：

1) Shen Mli ke

2) Pan, Rui xiang

3) LIN SHU RON S

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director
Office of City Planning
120 Broadway, New York, NY 10271
May 25th, 2017

RE: Comments on the Two Bridges LSRD
CEQR #: 17DCP 148M

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L E S O N
L O W E R E A S T S I D E
O R G A N I Z E D N E I G H B O R S

Robert Dobruskin, AICP, Director

Office of City Planning

120 Broadway, New York, N.Y. 10271

May 25, 2016

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- 大型高楼项目要在大型居住区建造，需要取得特殊许可、特殊许可修改意见或根据纽约市土地决议（“决议”）第 8 章第 VII 条所作的批准。如项目有对建筑体积和户外空间的再分配、对可发展的建筑面积和场地范围的最大增加、对空气和光线的大量限制和对邻里特色的完全改变，必须根据决议的相关条例和程序分别进行研究。
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签名：

- 1) Jack Phung 96 Baxter St. New York N.Y. 10013
- 2) Tina 143-05 22nd Ave. Whitestone NY 11357
- 3) Michael 60-11 Broadway 11377

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director

Office of City Planning

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签名：

- 1) AGUSTIN Chank
- 2) Meng Ch
- 3) Shan Ma Lin

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director
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120 Broadway, New York, NY 10271
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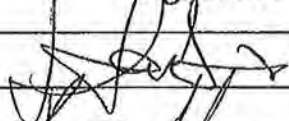
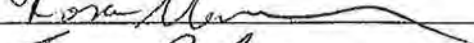

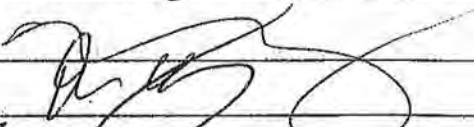
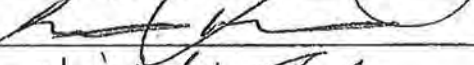
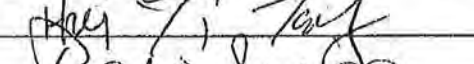
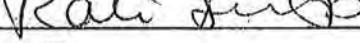

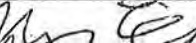

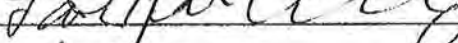
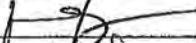

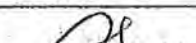
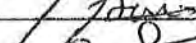


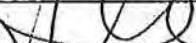



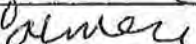

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Robert Dobruskin, ACP Director
 Office of City Planning
 120 Broadway, New York, NY 10271
 May 25th, 2017

RE: Comments on the Two Bridges LSRD
 CEQR #: 17DCP 148M

RESIDENTS OF 82 KATHLEEN
 SLIP.

Name	Signature
Juan Santacruz	
Rosa Moreno	
Tracy Chung CHUNG	
David Qui	
Ralph RAMIREZ	
SUSANA Roman	
Hui Yi Tang	
Robyn Smith	
MANUELA FISH	
Margan Capriccio	
LAT YIN CHUNG	
Yong Qin Huang	
Candy Wu	
Janna Wu	
Carel Smith	
Professors	
Avila	
CHERRY 2	
Carmer Gehrold	
JIMMY WONG	
Jessica Aruando	
Ishmael Abarrado	
HAKIM SULLIVAN	

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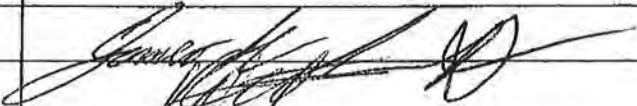
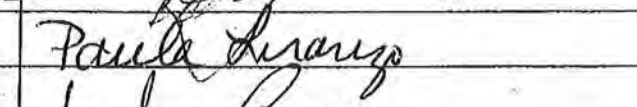

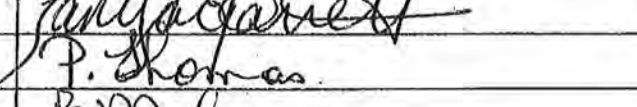
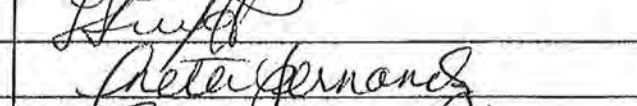
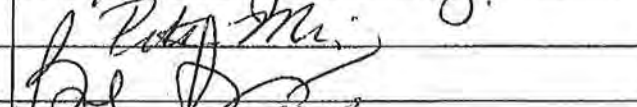
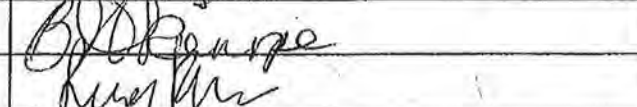
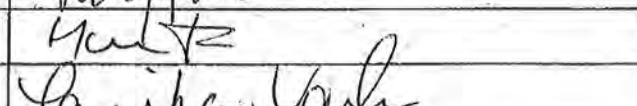
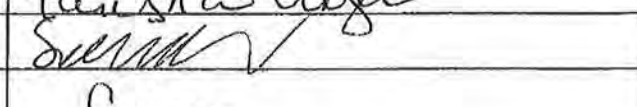
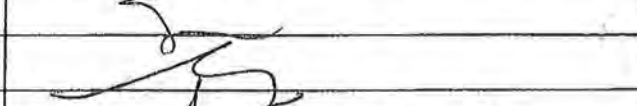
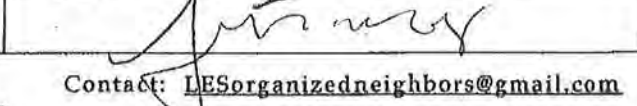


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James M Smith	
Peter Ylles	
Paula Liranzo	Paula Liranzo
Joseph Reyes	
Anchael M	
Tanya Garbett	Tanya Garbett
Pamela Thomas	P. Thomas
Brenda Maloy	B. Maloy
Antonio Gueylin	
Clara Smith	
Tnette Fernandez	Tnette Fernandez
Peter Mei	Peter Mei
Brenk Star	
Regina Diaberto	Regina Diaberto
Hector Santaliz	
Barbara Kempe	Barbara Kempe
Miychi	
maria fabian	Martz
Tanisha Vaughn	Tanisha Vaughn
Seth A. Receipts	
Carlos Ortiz	
Qi Chen	
Tony Wong	
MARIA LU HONG	
Ji Mei Ong	

LESON

Lower East Side Organized Neighbors

Robert Dobruskin, ACP Director

Office of City Planning

120 Broadway, New York, NY 10271

May 25th, 2017

RE: Comments on the Two Bridges LSRD

CEQR #: 17DCP 148M

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 Office of City Planning
 120 Broadway, New York, NY 10271
 May 25th, 2017

RE: Comments on the Two Bridges LSRD
 CEQR #: 17DCP 148M

LESON COMMENT SIGNATURES

Name/ Address	Name/ Address
Alondra Miller	41 A South Ave
Maurice Mazzyk	160 Madison Street
May Mui	48 Hester St Apt 8A
Linda Chardler	38 Rutgers st. #6B
Joanna Estevez	82 Rutgers slip #9C
Sunita Faizy	168-17 Crocheron Ave Flushing N.Y.
Michael [Signature]	1326 - Riverside Drive

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RE: Comments on the Two Bridges LSRD
 CEQR #: 17DCP 148M

LESON COMMENT SIGNATURES

Name/ Address	Name/ Address
Francis Alberto	65 Jefferson ST.
Maria Cabral	300 cherry ST apt 6F
Anna Mumip	82 Rutgers Slip
Karl Meyer	265 Cherry St 24E
Kai Ong	265 Cherry St
Nidhi Ramo	265 cherry St apt 6D
Marie Sanchez	265 Cherry St 25D
Elyse Perez	265 cherry St. 146
L'white	265 cherry St 23
MARSHA PROFIT	265 Cherry St.
Merlinda Choco.	265 Cherry St. APT. 5J
PAULINE FOUST	265 CHERRY ST
Daniel Foust	265 Cherry St
Juana Rodriguez	265 Cherry St
Carla M. Cin	265 Cherry St.
Jalman	265 Cherry St 26.5
Anna Lan	265 Cherry St.
Juan Rodriguez	265 CHERRY ST
Christy Chen	265 cherry St
Anne Tilley	265 cherry St

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 May 25th, 2017

RE: Comments on the Two Bridges LSRD
 CEQR #: 17DCP 148M

LESON COMMENT SIGNATURES

Name/ Address	Name/ Address
Nancy Crane 265 Cherry New York	Alice CANCEY / 333 Pearl St
Franklin Abreu 265 Cherry New York 256	Edo Guinov 553 Pearl St
Sandy Auer 265 Cherry	Carmin J. Castro
Ching Han Chy 265 24K	75 St James Pl NYC NY 10038
Howard Ki 265 Cherry 24A	38 Governor St NYC 1002
Ellen Fom 265 Cherry 23A	PATRICIA CHU / 265 CHERRY ST.
Mohd Fouad 265 Cherry St	Nancy Chu / 265 Cherry St
Edgar Reyes " "	Lan Ju Chu / 265 Cherry St
Adam Reyes " "	Melania Tolentino 265 Cherry St
Christina Reyes " 224	Nativada Salce 265 Cherry St
Jess 22K	Cristina Polanco 265 Cherry St
Lyndee 265 22D	Tommaso Britz
Yan F. Shy 22C	Ramon SHUM
Prerna Castille 265 CHU	Raul SHUM
Brenda Sides 265 Cherry St	Saul Shum
Roshni Singh 150 Pitt St. NYC 10003	Lisa Lam
Velma Frezzell 648 Water St.	
Oswaldo Mendez 265 CHERRY St apt #205	

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 May 25th, 2017

RE: Comments on the Two Bridges LSRD
 CEQR #: 17DCP 148M

LESON COMMENT SIGNATURES

Name/ Address	Name/ Address
CHRISTINA ZHANG - 32 MONROE ST	Maizardi Bohere 20 Ave D
Dennis Santana 34 Monroe st	Alex Velez 286 South St
Eduardo Santana 286 South St	MARY Richardson 40 Ave D
Yue Mary Yuen 286 South St.	Francisco Echeverria 286 South St
Sophia Tsang 364 Madison St	Gianna Santos 286 South St
Felipe Alvarez 286 South St	CHENG, YUK CHEN 286 South St
Liana DeLeon 286 South St	Jennifer Jones 40 Ave D
Ying Wu 286 South Street	Ming Chen 286 South St
Ana Papp 286 South St	Ramona Munoz 286 South St
Theresa Nguyen 286 South St	ALEX VEIEZ 286 South St
Yan Cao 286 S. St.	Frances Lee 286 South St
Ania Gudi 286 South St	Ruby Almonte 286 South St
Jim 286 South St.	Chai Tung Moy 286 South St
CHI MEI WONG 286 South St	Jeanne Burton 286 South St
Julia Santana 286 South St	Lyrene Pelliferzo 275 South St
Antonina Tabares 286 South St	
Chau Alex Chan Yin 286 South St	
Luis Rolaes 286 South Street	
Mang Lebron 286 South St	Jose Rodriguez 265 Cherry St
Khalil Davis 286 South Street	

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Lower East Side Organized Neighbors

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RE: Comments on the Two Bridges LSRD
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Name	Signature Address
Naomi Garcia	54 Rutgers Street
Johan Lum	110 CLIFTON PL.
Yolanda DONATO	819 F.D.R. Dr 9C 10009
Michael herrera	1326 Riverside Drive
Louise Keler	1017 FDR DR #2C NYC 10009

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RE: Comments on the Two Bridges LSRD
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LESON COMMENT SIGNATURES

Name/ Address	Name/ Address
275 SOUTH ST LINDA TANG	
265 CHERRY ST @ YVET L TANG	
Ku/Me/De/5/ 286 south st	
Allen Ng 275 South Street	
JACK CHOW 32 MONROE ST.	
David Levy 57 th place	
Aileen Chu 34 Monroes St	
Richard Ng 34 Monroes St	
si m hsi 38 monroe st	
jw/ kum 32 Monroes St	
Richard Yuen 32 Monroe Street	
PATRICK HUI 265 Cherry St	

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LESON COMMENT SIGNATURES

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Melanie Tolentino	82 Rutgers St # 5 21K
Maria Fabian /	Maria Fabian
Joseph Nozto	309 Cherry St NY
Josefina Morales	2055 Harrison St 10453
Grace Lara	82 2nd Ave # 4E 10009
Chakene Spain	140 Columbia St 10002
Miriam Ramos	157 Belmont Ave Brooklyn
Henry Ullman	301 Audubon Ave. N.Y.N.Y. 10033
Ivan Rivera	644 Water St. N.Y., N.Y. 10002
Luciana Lopez	38 Rutgers St NYC
Rosie Vesel	333 Pearl St.
Gilbert Saiz	340 Cherry St -
Anelies Vargas	175 Clinton
Dalia Aoto	340 cherry st.
Miguel Rodriguez	35 Montomey St
Mario Ortiz	230 Clinton St apt 10F
ELSA QUINONES	675 Water St NYC 10002
MANUEL QUINONES	675 WATER STREET 10002
Evelyn Rivera	205 Cherry St # 25B
Lucy	55 Rutgers Street, NY 10002
Nidia Rodriguez Daley	65 Jefferson St NY 10002

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May 25th, 2017

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GRACE WU / 111 FULTON ST. NYC	
STELLA WU / 111 FULTON ST. NYC	
JAKE WU / 111 FULTON ST. NYC	
CAYLA CHAN / 111 FULTON ST. NYC	
Mariah Davis / 160 Cornelia St. Brooklyn.	
Cal Malone / 11 4th ave	

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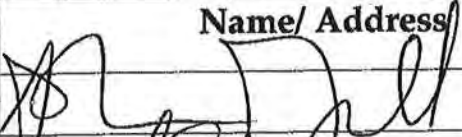
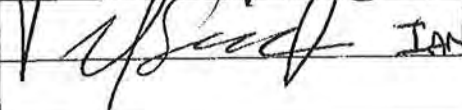
Name/ Address	Name/ Address
	286 South St
 IAN	286 South St St

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CITY OF NEW YORK
DEPARTMENT OF CITY PLANNING

-----X

PUBLIC SCOPING SESSION

RE: TWO BRIDGES LARGE SCALE RESIDENTIAL
DEVELOPMENT (LSRD) PROPOSAL

CEQR #17DCP148M.

-----X

Second Floor Rotunda
One Centre Street
New York, New York

May 25, 2107
2:10 p.m.

B E F O R E: ROBERT DOBRUSKIN,
The Chair

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A P P E A R A N C E S :

FOR DCP:

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Reported by:
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2 P R O C E E D I N G S

3 THE CHAIR: Okay, everyone,
4 we're going to get started. Welcome, thank you all
5 for coming.

6 This is the public scoping
7 meeting for the Two Bridges Large Scale Residential
8 Development or LSRD proposal.

9 For the record, I need to note
10 that the City Environmental Quality Review or CEQR
11 application number for the proposal is 17DCP148M.

12 Today's date is Thursday, May
13 25th, 2017, and the time is now 2:10 p.m.

14 I'm Robert Dobruskin. I'm the
15 Director of the Environmental Assessment and Review
16 Division for the New York city Department of City
17 Planning, and I'll be chairing today's scoping
18 meeting. The Department of City Planning is acting
19 on behalf of the New York City Planning Commission
20 as the lead agency for this environmental review.
21 As lead agency, the department will be responsible
22 for overseeing the preparation and completion of
23 the environmental impact statement for the
24 proposal.

25 Joining me today are several of

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2 my colleagues from the Department of City Planning.
3 Sami Laurell is the Environmental Review Project
4 Manager for the proposal. Sitting next to Sami is
5 Joel Kolkmann, who is the senior planner in the
6 Manhattan office of the department. And at the end
7 of the table is Eric Botsford, who's the Deputy
8 Director of the Manhattan Office of City Planning.
9 Together we are all here to receive your comments
10 on the draft scope of work for the DEIS that will
11 be prepared for the Two Bridges proposal. The
12 draft scope of work identifies all the subjects
13 that will be analyzed in the upcoming DEIS, and
14 explains how the subjects will be analyzed.

15 For those of you who might not
16 have seen the draft scope yet, we do have some
17 copies available at the sign-in desk right next to
18 where you entered the room. And we also have
19 copies of the scoping protocol for today's meeting.

20 You can also view these
21 materials on the Department of City Planning's
22 website.

23 The purpose of scoping is to
24 allow for public participation in the environmental
25 review process at the earliest stage possible. In

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2 scoping, the public can share their views on the
3 draft scope of work and help shape the scope for
4 the DEIS before it is prepared. And toward that
5 end, we'll have an opportunity today to receive
6 comments on the draft scope from elected officials,
7 community board representatives, government
8 agencies, and members of the public.

9 In addition to the comments we
10 hear today, we'll also be receiving written
11 comments on the draft scope. And you can give us
12 your written comments today if you want, or send
13 them in to us at the address shown on the scoping
14 protocol. The comment period will remain open
15 until the close of business on Thursday, June 8th.

16 At end of the comment period,
17 the Department, as lead agency, will review all of
18 the comments that we have received, those we hear
19 today, as well as all written comments. We'll then
20 decide what changes, if any, need to be made to the
21 draft scope. And we will then issue a final scope
22 of work. And it's the final scope of work that
23 will serve as the basis for preparing the Draft
24 Environmental Impact Statement.

25 In terms of the format of

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2 today's meeting, there are going to be two
3 sessions. This is the afternoon session. There
4 will also be an evening session starting at six
5 o'clock.

6 Each session is going to be
7 divided into three parts. During the first part,
8 the applicant team will make a brief presentation
9 describing the proposal and summarizing the draft
10 scope of work. During the second part of the
11 meeting we'll be receiving comments from elected
12 officials, community board representatives, and any
13 government agency. During the third and final part
14 of the meeting, we'll be receiving comments from
15 members of the general public.

16 If you wish to speak today,
17 you'll need to complete a speaker's card. Those
18 are available at the sign-in desk. Just to let you
19 know, speaking time will be limited to three
20 minutes. And we do ask that you limit your
21 comments to the subject of the draft scope of work
22 itself.

23 So now I'm going to turn things
24 over to the applicant team and they will begin
25 their presentation.

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2 MS. LOCKE: Thank you.

3 Thank you. My name is Anne
4 Locke, and I'm a Senior Vice President of AKRF.
5 And we will be preparing the EIS for this project,
6 this series of projects.

7 The EIS will be analyzing three
8 separate proposals by three separate applicant
9 teams. I'll describe these projects briefly before
10 discussing the EIS.

11 The three applicants, Cherry
12 Street Owner, LLC; Two Bridges Associates, LP; and
13 LE1 Sub LLC, each seek to develop new mixed-use
14 buildings within the Two Bridges Large Scale
15 Residential District, LSRD for short, which is
16 located in the Lower East Side neighborhood of
17 Manhattan in Community District 3.

18 The Two Bridges LSRD was
19 originally approved by the City Planning Commission
20 in 1972 and governs development within its
21 boundaries. The site numbering we are using in
22 this presentation, and will use in the EIS,
23 corresponds with the numbering of sites in the Two
24 Bridges LSRD.

25 The 247 Cherry Street project is

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2 proposed for Two Bridges Site 4, that's 4A and B,
3 which comprises Block 248, Lots 15, 70 and 76. The
4 new development would be located at Rutgers Slip
5 and Cherry Street, and contain up to 660
6 residential units, as well as ten units relocated
7 for the existing 80 Rutgers Slip building on the
8 project site.

9 The proposed building will be
10 approximately 79 stories tall, and would cantilever
11 over a one story retail building on the site, as
12 well as the existing 80 Rutgers Slip building,
13 portions of which would be integrated into the new
14 building. Approximately 3,214 square feet of new
15 retail uses will be introduced into the base of the
16 80 Rutgers Slip building.

17 The 260 South Street project is
18 proposed for Two Bridges Site 5, which comprises
19 Lots one and two of Block 247. The new development
20 on the site on South Street east of Rutgers Slip
21 would provide up to 1,350 residential units and
22 approximately 17,000 square feet for community
23 facilities. The project would maintain the 103
24 surface parking spaces that currently exist on the
25 site, relocating these spaces to a garage in the

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2 lower level of the proposed building.

3 The proposed project would also
4 create one story expansions of the existing
5 buildings at 265 and 275 Cherry Street for retail
6 use. The proposed building would have two towers
7 reaching a height of approximately 69 stories from
8 a shared base.

9 The 259 Clinton Street project
10 is proposed for Two Bridges Site 6A, which
11 comprises Lots one through five of Block 246. This
12 development at Clinton and South Streets would
13 include up to 765 residential units and
14 approximately 2,500 square feet of retail use. The
15 proposed building on this site would be
16 approximately 62 stories tall.

17 Twenty-five percent of all the
18 proposed residential units would be permanently
19 affordable. And all three projects would also
20 involve improvements for existing private open
21 space and/or the creation of new private open
22 space, as well as resiliency improvements.

23 The proposed projects each
24 require a minor modification to the existing Two
25 Bridges LSRD. There are two types of approvals

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2 that City Planning can grant when there are already
3 special permits in place. A major modification is
4 needed when a proposed building requires changes or
5 waivers to the underlying zoning use. A minor
6 modification is needed when a proposed building
7 complies with the underlying zoning and only needs
8 to change an approved site plan or other special
9 permit requirements.

10 In this case, the new mixed-use
11 developments on each of the three project sites
12 would comply with the underlying district
13 regulations applicable to the sites. The
14 modifications needed to facilitate the projects
15 relate to the site plan and other controls of the
16 Two Bridges LSRD special permit, but do not relate
17 to underlying zoning regulations. Accordingly, the
18 proposed projects require minor modifications.

19 The minor modifications are
20 discretionary actions by the City Planning
21 Commission that are subject to review under the
22 City's Environmental Quality Review Act, CEQR.

23 DCP, acting on behalf of the CPC
24 as CEQR lead agency, has determined that the
25 proposed actions are Type I under SEQRA.

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2 Accordingly, we prepared a full Environmental
3 Assessment Statement and a Draft EIS scope of work.
4 These documents are available on the City Planning
5 website.

6 The Draft EIS, or DEIS, will use
7 the City's CEQR Technical Manual as the general
8 guide on the methodologies and impact criteria for
9 evaluating potential effects on the various
10 technical areas of analysis. The CEQRA Technical
11 Manual is a detailed guidance document that sets
12 the framework for environmental reviews here in the
13 City of New York. The CEQRA Technical Manual
14 outlines 19 technical areas that should be
15 considered in assessing a project's potential
16 effects.

17 The draft scope of work for the
18 preparation of this DEIS proposes to examine the
19 proposed actions' potential impact on these
20 environmental areas of concern, including:

21 Land use, zoning and public
22 policy;

23 Socioeconomic conditions;

24 Community facilities;

25 Open space;

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2 Shadows;

3 Historic and cultural resources;

4 Urban design and visual

5 resources;

6 Hazardous materials;

7 Water and sewer infrastructure;

8 Energy;

9 Transportation;

10 Air quality;

11 Greenhouse gas emissions;

12 Noise;

13 Public health;

14 Neighborhood character; and

15 Construction effects.

16 Where the potential for

17 significant adverse impacts is identified, the DEIS

18 will identify mitigation measures and disclose

19 those significant adverse impacts that may be

20 unavoidable. The DEIS will also discuss potential

21 alternatives to the proposed projects that would

22 reduce or avoid the potential for significant

23 adverse impacts.

24 While three of the proposed

25 projects are set -- while the three proposed

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2 projects are separate development proposals, their
3 potential environmental impacts are being
4 considered in a single EIS due to their physical
5 proximity and the likelihood of their being
6 constructed during the same time periods. The
7 analysis of all three projects in one EIS will
8 provide the lead agency and the public with an
9 understanding of the cumulative impacts of the
10 three projects.

11 For each of the relevant
12 technical areas for analysis, the DEIS will provide
13 a description of the existing conditions and
14 assessments of future conditions without and with
15 the proposed actions in 2021, which is when the
16 three projects are anticipated to be completed and
17 operational.

18 While the draft scope details
19 the approach and methodology to be applied to each
20 of the relevant environmental areas of analysis,
21 I'd like to highlight some particular areas this --
22 I'd like to highlight some of the particular areas
23 that the DEIS will assess.

24 For socioeconomic conditions,
25 the analysis will consider the potential for the

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2 proposed projects to affect the socioeconomic
3 character of the surrounding area, including the
4 potential for the projects to result in direct or
5 indirect displacement of residents or businesses.

6 The community facilities and
7 services analysis will consider the potential for
8 new resident and new worker populations created by
9 the proposed projects to affect public schools,
10 publicly funded day care facilities, and public
11 libraries.

12 Transportation. Working in
13 consultation with City DOT and MTA, we will assess
14 the potential effects of the proposed projects on
15 the local transportation and transit networks, as
16 well as parking in the area.

17 The DEIS will also assess
18 potential construction related impacts. It will
19 describe a conceptual construction schedule,
20 identify the activities and equipment used in each
21 stage of construction, and provide estimates of
22 workers and truck trips. It will also identify
23 staging locations and temporary sidewalk and lane
24 closures. Because the three sites are located
25 close to one another, and the project side of

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2 site -- the project on Site 4 involves changes to
3 an existing residential building that will be
4 occupied during the construction period, the
5 consideration of construction impacts is
6 particularly important for this DEIS.

7 The construction chapter will
8 assess environmental concerns such as traffic and
9 pedestrians, air quality, hazardous materials, and
10 noise. Measures to minimize or avoid potential
11 construction impacts will be identified.

12 As noted above, where
13 significant adverse impacts may result, we will
14 identify potential mitigation measures and/or
15 alternatives that avoid or minimize those impacts.

16 In order to understand how the
17 cumulative impacts of the proposed projects might
18 change if one or more of the projects is delayed
19 indefinitely or ultimately not pursued, the EIS
20 will also provide qualitative analysis of certain
21 permutations in a separate chapter. This analysis
22 will be limited to evaluating specific technical
23 areas, locations or facilities for which impacts
24 and mitigation needs have been identified under the
25 cumulative impact analysis of all three projects.

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2 But we are here to hear your
3 comments on the draft scope of work, so I'd like to
4 hand the floor back to Robert Dobruskin so we can
5 get started hearing from you. Thank you.

6 THE CHAIR: Thank you very much,
7 Anne.

8 So that concludes the first part
9 of the meeting, the presentation. And now we are
10 going to switch over to the second part of the
11 meeting, comments from elected officials, community
12 board representatives, and government agencies.

13 Our first speaker will be
14 Council Member Margaret Chen.

15 MS. CHIN: Good afternoon. I'm
16 Council Member Margaret Chin. I wish to thank you
17 for this opportunity to provide testimony. I would
18 also like to thank the members of the Two Bridges
19 community for taking the time to come out to make
20 their voices known on these unacceptable proposals.

21 I am sickened by the prospect of
22 these out-of-scale proposed developments. I cannot
23 fathom the size of these towers, which are huge and
24 out of place in this neighborhood.

25 Today our thousands of

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2 affordable housing units along the waterfront are
3 the legacy of a policy of creating a neighborhood
4 of seniors and working families from low to middle
5 income. These New Yorkers come from many different
6 backgrounds and cultures. They are what makes New
7 York. And with these proposals, they are under
8 threat.

9 We need more public input on
10 land use decisions, not less. We asked for a ULURP
11 process to ensure that all voices are heard. But
12 the Department of City Planning said no. What we
13 have instead is this EIS to consider a proposal for
14 the three huge luxury towers. These proposals
15 would add thousands of new residents without a plan
16 to address the needs of people who build this
17 neighborhood. And the steering. I urge you to
18 consider carefully the impact of these proposals on
19 the people who live and work here now. Not an
20 imaginary community of luxury units.

21 In partnership with the Borough
22 President and community leaders, my office
23 conducted a survey to identify and measure the
24 community concerns and priorities. This is what we
25 found. The highest priority of this community is

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2 preserving and honoring its legacy as an affordable
3 and diverse neighborhood. Residents want a clean
4 train station with safe and accessible platforms.
5 They want regular and reliable bus service. They
6 want buildings that honor the modest scale of
7 twenty to thirty stories. They want a grocery
8 store nearby. Safe open space. And access to the
9 waterfront. This is their wish list. These are
10 basic necessity of life that anyone else would
11 consider their rights.

12 But this isn't the Upper East
13 Side. This is Two Bridges. A place where three
14 minor modifications somehow do not equal a major
15 modification that would trigger ULURP, a robust,
16 public engagement process and City Council vote.

17 We all see what is happening at
18 Extell. Unfortunately, as a truly as-of-right
19 project, Extell never had to come to a hearing like
20 this one. But that is little solace for a
21 community under siege.

22 In order to protect this
23 community, we will continue to demand that these
24 out-of-scale buildings be subject to a full review
25 process through ULURP. Full remarks on the changes

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2 I would like to see to the draft scope of work will
3 be submitted in writing, but here are some of the
4 most urgent needs.

5 The scope must acknowledge that
6 the size of these proposals is off the charts. And
7 that the EIS framework should require the broadest
8 boundaries and include thorough analysis in every
9 aspect, from socioeconomics to the capacity of our
10 public health resources.

11 We need a detailed and complete
12 plan for whether or not there will be direct
13 residential displacement of seniors at 80 Rutgers
14 Slip.

15 I would like to remind everyone
16 here that these are only proposals. This is not a
17 done deal. United, this community will fight to
18 make our voices heard, and united we will win.

19 Thank you very much.

20 (Applause)

21 THE CHAIR: Thank you very much.

22 Are there any other elected
23 officials or community board representatives or
24 government agencies who wish to speak at this time?

25 MR. BARD: Jim Bard from Gale's

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2 office. She's on her way down.

3 THE CHAIR: Okay.

4 MR. BARD: But she's not here
5 yet.

6 THE CHAIR: I think what we are
7 going to do then is move on to the public speakers,
8 and when the Borough President arrives, we'll call
9 her.

10 MR. BARD: Perfect. Thank you.

11 THE CHAIR: Our first speaker
12 will be Justin Stern.

13 MR. STERN: Hi. I'm Justin
14 Stern. I'm here for Little Cherry, LLC, which
15 holds the long term ground lease on Lot 76. We're
16 Site 4 in the Draft EIS scope.

17 We have carefully reviewed the
18 Draft EIS scope and identified numerous defects.
19 But today I want to share with you seven fatal
20 flaws which require that the scope be rejected.

21 Fatal flaw number one. The
22 developers in the scope propose adding over 2,700
23 new residential units into the area, yet they do
24 not include a single additional parking space. Two
25 thousand new middle income to high income units and

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2 zero new parking. This is simply absurd. Where
3 are all those new residents going to park, or do
4 they just assume none of them will own a car?

5 Fatal flaw number two. The
6 scope includes a traffic demand analysis, but that
7 fails to address the huge impact the projects will
8 have on existing parking and traffic, as well as
9 the impact of other developments in the area, which
10 are not included in the scope and should be.
11 Specifically as it's crossing Seward Park. There's
12 a proposed NYCHA development which we've heard
13 about, and also one at Manhattan Square.

14 Fatal flaw number three. The
15 scope's stated number of parking garages within
16 one-quarter mile is simply flat out inaccurate and
17 untrue. The scope asserts that there are nine
18 garages within a quarter of a mile. But we
19 actually counted them. Upon completion, the actual
20 number of garages will be only two. And both of
21 these garages already have long waiting lists.

22 Fatal flaw number four. The
23 scope claims that it will improve open space in the
24 area. Yet, Little Cherry has clear prior rights to
25 the open space, pursuant to its ground lease. JDS

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2 has included the open space from Site 4. But how
3 can they do that when Little Cherry must consent?
4 This is yet another misrepresentation. There has
5 been no consent.

6 Fatal flaw number five. The
7 proposed development requires a merger of tax lots,
8 including lot 76, to create a combined zoning lot
9 that includes the lot leased by Little Cherry.
10 Long ago, Little Cherry was certified by title as a
11 party of interest. And, as such, our consent will
12 be required to effectuate the merger of the tax
13 lots. Little Cherry has not consented. And JDS in
14 a practical sense does not have the right to
15 develop the proposed structure. We truly do not
16 understand why we are even here today.

17 Fatal flaw number six. Oh, I
18 don't have the plan. But you'll see -- I think
19 everyone in this room most likely has seen the plan
20 of the cantilever, its massive tower over Little
21 Cherry's building. Since this construction is
22 potentially incredibly dangerous, Little Cherry
23 retains its rights under the long term remedies.
24 Little Cherry is not consenting to this crazy
25 cantilever. So again, why is JDS even in the scope

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2 on it.

3 Lastly, fatal flaw number seven.
4 Finally, the scope was supposed to address
5 alternative uses and environmental factors like air
6 quality, shadows, and impact on the character of
7 the neighborhood. None of this is addressed.
8 Indeed, less intrusive developments have been
9 proposed for Site 4. For this reason too, the
10 scope should be rejected.

11 Thank you.

12 (Applause.)

13 THE CHAIR: Thank you very much
14 for your comments.

15 The next speaker will be Gary
16 Spindler.

17 And just to let you know and as
18 a reminder, speaking time is limited to three
19 minutes. We'll remind you when your three minutes
20 are up.

21 MR. SPINDLER: No problem.

22 Thank you for holding this
23 meeting. I'm Gary Spindler, here for Little
24 Cherry, LLC, lot 76, Site 4 in the scoping report.
25 I want to go over two major defects in the scope.

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2 First, I want to go over the
3 parking. Just take a look at the numbers. Look at
4 the developers propose adding over 2,700 new
5 residential units to the area, yet they don't
6 include any new parking space, any new street
7 parking or off site parking -- or off street
8 parking. How is that possible? As it stands now,
9 there is a need for more parking spaces. Drivers
10 circle the area looking for parking facilities to
11 park, which creates additional traffic for the
12 neighborhood. Can you imagine with 2,700 more
13 units in the area? Do the developers expect
14 everyone to use mass transit? I can tell you that
15 many of those new families that will be moving into
16 these buildings will own a car, and they will want
17 somewhere nearby to park that car. And they will
18 find nothing to do, to park their car.

19 Indeed, the scope asserts that
20 there are nine garages within a quarter mile area.
21 But by the time this project is completed, there
22 will be -- only two to three garages will remain,
23 as the others are potential development sites.
24 Indeed, we looked into the situation and the
25 residents could not even get into those garages

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2 currently available. All the garages are full and
3 have waiting lists. And, on top of everything, the
4 scope does not even address Essex Crossing, Seward
5 Park, a NYCHA development, and One Madison -- One
6 Manhattan Square.

7 Second, I want to address the
8 open space, as previously done. The scope claims
9 that it will improve open space in the area. But,
10 at the same time, it acknowledges that over a
11 hundred thousand square feet of open space will be
12 lost once the developments are completed. How do
13 you improve open space when you reduce it by a
14 hundred thousand square feet? This makes no sense.

15 Further, our company, Little
16 Cherry, hold a long term ground lease on lot 76,
17 Site 4. JDS is including this open space around
18 our lot as part of their claimed improvement. But
19 our ground lease places limits on what JDS and the
20 surrounding buildings may or may not do with this
21 open space.

22 Essentially, Little Cherry has
23 rights as to what could be done with that open
24 space. And JDS has never sought our approval or
25 consent to any of this as they present here to this

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2 committee. Frankly, it's truly amazing that JDS
3 and Michael Stern have included this open space in
4 the scope in light of the ground lease and their
5 failure, in any way, to seek our approval or
6 consent.

7 In summary, there are many
8 majors flaws with the scope, and it should be
9 rejected.

10 Thank you for your time.

11 (Applause.)

12 THE CHAIR: Thank you.

13 Our next speaker will be Brendan
14 Schmidt.

15 MR. SCHMIDT: Good afternoon.

16 I'm here today to singularly address the proposed
17 JDS tower and specifically a fatal defect in the
18 JDS application which forecloses its ability to
19 construct the proposed tower and renders the
20 application today moot.

21 The location of the proposed JDS
22 tower, Site 4, Lot 70 and 76, Block 248, are going
23 to be merged pursuant to a zoning lot merger. For
24 context, the zoning lot merger is the joining of
25 several adjacent tax lots that enables a owner of

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2 the tax lots to assemble the development rights and
3 construct there on the merged lot. While JDS's
4 Draft EIS cavalierly proclaims that this project
5 will require an as-of-right zoning lot merger, it
6 fails to acknowledge whose right it actually is to
7 merge zoning lots. Filling in the blanks for JDS
8 in order to merge tax lots, the parties of interest
9 to the merged tax lots must consent. Parties of
10 interest is a fancy term for any person or entity
11 with an interest in real property.

12 One party with interest in real
13 property in Lots 15, 70 and 76 is Little Cherry,
14 LLC, the holder of a 49 year ground lease to Lot
15 76. Little Cherry developed lot 76 and remains in
16 unfettered control of Lot 76 until its ground lease
17 terminates in 2044.

18 As the ground lessee of Lot 76,
19 Little Cherry is actually familiar with the process
20 of merging zoning lots because Little Cherry
21 consented to a prior merger of Lots 15 and 76 in
22 2008. And I know that Little Cherry consented to
23 that lot merger because I see their certification
24 right here on a parties of interest form prepared
25 by a title company, which states that Little Cherry

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2 is the party of interest.

3 Now, as JDS's application
4 tacitly admits in the scoping documents, its tower
5 cannot be built without the merger of tax lots 15,
6 70 and 76. The glaring problem here is that they
7 need Little Cherry LLC's approval to merge those
8 tax lots, and Little Cherry refused. Without that
9 consent, the zoning lot merger cannot be
10 effectuated, and JDS cannot build the building.
11 Simply put, JDS lacks the ability to merge the
12 lots, and for that reason they will be unable to
13 construct their building. I can only ask why is
14 JDS here today in light of all of this. They're
15 looking for an environmental impact feedback, but
16 they don't even have the key to the front door yet.

17 Thank you.

18 (Applause.)

19 THE CHAIR: Thank you.

20 Our next speaker is Maureen
21 Koetz.

22 MS. KOETZ: Good morning, thank
23 you. I'm here representing the Lower East Side
24 Organized Neighbors, also known as LESON. We have
25 submitted formal comments to the EIS process. I'll

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2 just make a couple of quick points.

3 It's worthy to note that it is
4 the State Environmental Quality Review Act that
5 controls this process, not the CEQR Manual. That
6 Act also has many environmental quality review act
7 regulations that control this process, not just the
8 CEQR Manual. And there are also City laws and a
9 executive order by the mayor that are controlling
10 in this process. So the CEQR Technical Manual is
11 useful guidance. It is not what controls this
12 process.

13 Under State Environment Quality
14 Review Act requirements, the areas of analysis have
15 to meet state law, and they also must include
16 alternatives. And, as we all know, they must
17 include alternatives, and you published the scope
18 with none. So it's important to include
19 alternatives, specifically those that would meet
20 community zoning preferences, like maximum heights
21 of no more than twenty or thirty stories.

22 There is no stated purpose for
23 the proposed action. The City Planning Commission
24 is getting ready to issue permits and special
25 permit modifications and authorizations. It's

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2 important to use the term "authorizations." Those
3 are what are in the zoning resolution chapter --
4 Article 7, Chapter eight. That is also involved in
5 this process. If there is a purpose for issuing
6 those authorizations other than making real estate
7 developers rich, it's important that you note that.

8 The sewage system analysis
9 should include the entire drainage basin area that
10 feeds Newtown Creek Wastewater Treatment Plant.
11 The state law calls for analysis of the sewage
12 system. That means all of the sewage that's going
13 to come out of these many thousands of new
14 apartments will go all the way to Brooklyn, and you
15 must analyze what's going to happen when that gets
16 to Brooklyn and is then emitted into an impaired
17 waterway known as the Newtown Creek.

18 The City is under compliance
19 orders from the State, and it just received an
20 administrative order for noncompliance with the
21 sewage piping maintenance systems. So that's
22 another reason to include the U.S. EPA and the
23 state Department of Environmental Conservation as
24 involved parties. The City should not be doing
25 this analysis alone. They should have help and

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2 guidance.

3 Last point is the shadows
4 assessment. These projects will cast shadows on
5 public housing. And if you look at that map and
6 you see how they're built in an X, that's because
7 they are deliberately built so that every window
8 will have sunlight. That makes public housing a
9 sunlight sensitive resource. It is no less
10 valuable. The children in those apartments are no
11 less valuable than the stained glass in any
12 churches in the area.

13 (Applause.)

14 MS. KOETZ: Thank you very much.

15 THE CHAIR: Thank you.

16 Our next speaker will be Sam
17 Moskowitz. And he will be followed by C. Soto and
18 then Olympia Kazi.

19 MR. MOSKOWITZ: Hello, thank
20 you. My name is Sam Moskowitz. I've been a Lower
21 East Side resident for over 30 years.

22 This LSRD scoping document is
23 full of egregious and false claims. Its bad
24 estimates and misleading data prove these
25 unscrupulous developers are making every possible

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2 effort to avoid the letter of the law, which
3 mandates that they mitigate the negative impacts of
4 this huge development.

5 The EIS requires the examination
6 of the project's environmental setting. However,
7 this document completely ignores the 2,200 new
8 units at 250 South Street at Essex Crossing that
9 will come online in the three years during this
10 development's time line. If they don't examine
11 what the neighborhood will look like at project
12 completion, it's not an honest study of the real
13 world environmental setting, and this entire
14 process is essentially useless.

15 Depending on what you consider
16 the neighborhood, these developments will increase
17 population density between 28 and 31 percent. This
18 data is included in my written submitted testimony.

19 They boldly claim that these
20 thousands of units will not increase bus ridership
21 enough to bother studying. Far smaller residential
22 projects have been required to conduct a bus
23 analysis as part of their EIS, so why not this one?

24 They are not using standard data
25 collection procedures. When they didn't get the

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2 desired results by studying parking within a
3 quarter mile, they simply changed the parameters of
4 the study to a half mile. Even within the half
5 mile study, the parking analysis is full of
6 fundamental errors. There are not 3,085 available
7 parking spots. Nine hundred and fifty of these
8 spots are in three lots that are scheduled to close
9 or have already closed. The vast majority of the
10 remaining spots are in lots that are at capacity
11 with waiting lists. So there's basically zero
12 spots available, not over 3,000.

13 What's the mitigation plan?

14 Over a million gallons of wastewater will be
15 produced by the LSRD every day. When running at
16 capacity, we just dump this into our waterways.
17 How will that be mitigated?

18 The section on traffic and
19 vehicle trips needs to be adjusted to reflect
20 reality. Several of these intersections indicated
21 on inset three on page 69, such as Bowery and
22 Pelham, were selected by the developers to skew the
23 data in their favor, while busier streets closer to
24 the development are mysteriously absent from the
25 study. Including Grand north towards -- Clinton

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2 north toward Grand, Essex and Grand between
3 Montgomery and Essex, any of which are the major
4 access points to and from the neighborhood.

5 They're claiming a review of
6 police and fire department capacity is unnecessary
7 because the LSRD is not a sizable new neighborhood.
8 But, by the same CEQR standards, the LSRD is
9 considered a sizable new neighborhood when it comes
10 to elementary schools, high schools, libraries,
11 health care facilities, child care facilities and
12 more. So why not fire and police? Do our local
13 first responders have the capacity to serve a
14 neighborhood of a 30 percent greater population
15 density? I think that's probably worth studying.

16 In summary, we need an honest
17 study. The LSRD does not exist in a vacuum, and
18 the EIS should accurately account for the 2,200
19 units in development set to open during the LSRD
20 development time line. An objective EIS must study
21 our real community --

22 (Bell rung.)

23 MR. MOSKOWITZ: -- not one
24 comprised of skewed data and vague estimates that
25 only exist on paper and PowerPoint presentations of

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2 luxury real estate developers and their high paid
3 consultants and lobbyists. Thank you.

4 THE CHAIR: Thank you.

5 (Applause.)

6 THE CHAIR: The next speaker
7 will be C. Soto, to be followed by Olympia Kazi,
8 and then Francisca Benitez.

9 MS. SOTO: Good afternoon.

10 THE CHAIR: Good afternoon.

11 MS. SOTO: My concern for this
12 zoning, I call it a vicious project, is the impact,
13 the environmental health it will bring into this
14 community. And it's really sad that most of these
15 residents have been living there for years.

16 We do appreciate change, but
17 this is -- I think it's overly ambitious.
18 Curtailing our air flow, not giving enough
19 playgrounds for the residents, their children. The
20 need of an elevator for the -- in the subway. So
21 these things that are in need, maybe I've
22 overlooked it, but I didn't see it being considered
23 in the project.

24 So that's all I have to say. So
25 we would appreciate you taking heed in this need.

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2 It's not what we want, but a need that we need in
3 the community.

4 Thank you.

5 (Applause.)

6 THE CHAIR: Thank you.

7 Our next speaker is Olympia
8 Kazi.

9 MS. KAZI: My name is Olympia
10 Kazi. I am an architecture critic and I have
11 worked for over a decade in nonprofits that deal
12 with issues of urban planning and design
13 excellence. So I'm also a resident of Manhattan
14 Community Board District 3. And I thank you for
15 the opportunity to testify today.

16 I particularly want to thank
17 Council Member Margaret Chin and the Manhattan
18 Borough President, because their work made it
19 possible today to have this joint EIS conversation,
20 especially when the Department of City Planning in
21 a highly, how do we say, questionable manner
22 decided there was not going to be any ULURP.

23 Anyway --

24 (Applause.)

25 MS. KAZI: The great majority of

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2 the testimonies you'll receive today would not have
3 been possible were it not for the citizen

4 volunteers who worked tirelessly with and within

5 Community Board 3 -- and they will testify later

6 today -- and with a lot of tenant organizations.

7 As a city, we cannot allow that urban development

8 of such scale and complexity is forced on the most

9 vulnerable middle and low income communities, and

10 we do not provide them with reasonable means and

11 time frames to formulate meaningful responses. So

12 that's why I want you to know and I wish to applaud

13 the team of expert volunteers from the City and

14 Regional Planning Program at Pratt Institute who

15 provided pro bono technical support for the local

16 residents. And I believe that their work mitigated

17 a great failure on the part of the de Blasio

18 administration, because, you know, we need to help

19 these communities to be able to give meaningful

20 responses.

21 Anyway, the scoping draft frames

22 the parameters of study for the EIS in a way that

23 conceals the severe impact this mega development

24 will have on the surrounding area. The most

25 obvious issues, we've heard it already, it

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2 understates, and at times conceals, the extreme
3 high risk for secondary displacement, and the
4 excessive impact that services like fire, police,
5 health care, bus, subway and parking will see from
6 this mega development. All these issues must be
7 properly studied with appropriate ranges and
8 methods that reflect the specific socioeconomic and
9 urban context.

10 The so-called minor modification
11 requested from the developers will add a lot of
12 floor area to these towers. They will provide 694
13 affordable units, for which they will receive
14 ample, you know, public funds through tax
15 incentives, but they will also bring 2,081 market
16 rate units in a neighborhood with the lowest AMI in
17 Manhattan. The gentrifying pressure that these
18 towers will inevitably have in the long term is
19 something which we cannot afford. You know, the
20 developers fail to offer in the draft scope any
21 reasonable argument on why they needed this minor
22 modification, why they needed this extra FAR --

23 (Bell rung.)

24 MS. KAZI: -- beyond lining
25 their own pockets.

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2 Anyway, very quickly, I also
3 have great concerns regarding the density, the
4 quality of public space, and the design of the
5 proposed towers. Two of them are too generic to be
6 worthy of the Manhattan skyline.

7 THE CHAIR: If you could
8 conclude now, please.

9 MS. KAZI: Excellent.

10 And parts of the projects will
11 be elevated on podiums, and that will be hard for
12 the pedestrians.

13 I want to thank you and I want
14 to endorse the Community Board 3, GOLES and
15 TUFF-LES written testimony that you receive later
16 today.

17 Thank you.

18 THE CHAIR: Thank you.

19 (Applause.)

20 THE CHAIR: Our next speaker is
21 Francisca Benitez, to be followed by Ling Shun
22 Chiu.

23 MS. BENITEZ: Good afternoon.
24 Good afternoon. Thank you for allowing us to
25 testify, and hearing our testimony. My name is

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2 Francisca Benitez. And I am a resident of
3 Chinatown, Lower East Side.

4 And I'm here also to point out
5 that this is not a minor modification. And I want
6 to see a real, honest study of the impact of these
7 developments in the Two Bridges Large Scale
8 Residential Development plan.

9 The proposed project will
10 introduce building forms to this neighborhood that
11 are new to the district and contrary to local
12 plans. These buildings forms were not considered
13 possible, considering the Large Scale Residential
14 Development Plan that governs the area.

15 The project as described will
16 introduce new building forms, referred to as
17 super-talls or mega towers, to a district composed
18 largely of medium density housing, which is low
19 income, middle income. And while the underlining
20 zoning allows such density, the right to build
21 under those densities was removed with the adoption
22 of the Large Scale Residential Plan in 1972.

23 So the amendment is not a minor
24 modification.

25 The Draft Environmental Impact

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2 Study should include:

3 The effects on schools;

4 Publicly funded child care;

5 Libraries;

6 Health care facilities and

7 hospitals; and also,

8 Direct and indirect displacement

9 of residents and small businesses;

10 The effects on open space;

11 On the electrical grid;

12 On our sewer system;

13 The effects of shadows,

14 On our historical resources;

15 On public transportation and

16 bike transportation;

17 The effects of climate change as

18 well; and

19 The character of the

20 neighborhood. It also should examine the adverse

21 impact that gentrification has on communities of

22 color with overpolicing of communities of color.

23 We have seen this happening when high income people

24 move into a low income neighborhood.

25 I also wanted to endorse the

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2 testimony of my neighbors that will come after me,
3 the Staff Workers Association, National
4 Organizations Against Sweat Shops, Youth Against
5 Displacement, LESON. And also I would like the
6 City Planning Commission to really look at the
7 Chinatown Working Group's plan, because if you
8 follow that, we wouldn't be discussing this this
9 way.

10 So the community has said over
11 and over to take this plan seriously. The
12 community took it seriously and worked really,
13 really hard on this plan. And that's why I want to
14 see City Planning pay attention to it and
15 ultimately enforce -- I mean approve any amendment.

16 Thank you so much.

17 (Applause.)

18 THE CHAIR: Thank you.

19 Our next speaker is Ling Shun
20 Chiu, to be followed by Ann McDermott.

21 Ling Shun Chiu? Do you not wish
22 to speak? Do you need interpretive services.

23 AUDIENCE MEMBER: No, no, she's
24 not speaking.

25 THE CHAIR: Okay. Our next

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2 speaker will be Ann McDermott, followed by Joseph
3 Reyes.

4 MS. McDERMOTT: My name is Ann
5 McDermott. I'm a resident of the Upper East Side
6 of Manhattan. And I'm a native New Yorker, born
7 and raised here.

8 And honestly, if this thing goes
9 through, I don't know how you guys can sleep at
10 night. New York is being turned into divide on the
11 Hudson.

12 (Applause.)

13 MS. McDERMOTT: Boro Park
14 Brooklyn, Long Island City, these neighborhoods
15 have been destroyed by rezoning and luxury
16 development. This is a working class town that was
17 built by people who came here to build something of
18 their lives.

19 (Applause.)

20 MS. McDERMOTT: And they're
21 being pushed out all over the city by luxury
22 development. Hospitals and libraries are being
23 sold to luxury developers.

24 (Applause.)

25 MS. McDERMOTT: It is time that

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2 the people of New York stood up to you and stopped
3 this overdevelopment and hideous architecture that
4 is being promulgated everywhere. That horrible
5 tower they're building on the corner of Cherry
6 Street right now, so much new development. All the
7 people who live there, who have kept that
8 neighborhood alive for years when people didn't
9 even want to look at the Lower East Side, and now
10 they've been pushed out by the policies of this
11 administration. So we say we have had enough. And
12 we're going to fight.

13 Thank you.

14 (Applause.)

15 THE CHAIR: Our next speaker is
16 Joseph Reyes. To be followed by Tom Angotti.

17 MR. REYES: Good afternoon.
18 Thank you for the opportunity to speak to you.

19 THE CHAIR: Good afternoon.

20 MR. REYES: My name is Joseph
21 Reyes. I'm a life-long resident of the Lower East
22 Side, I have twenty plus years in this area. And I
23 wanted to come today to simply pose my objection to
24 these massive scale projects that we have, the one
25 in particular that's about two or three hundred

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2 feet from my doorstep. And since -- I have a five
3 year old son, and since the Extell project started,
4 we've been to the hospital with him several times
5 because he has upper respiratory issues. The
6 amount of debris and dust and garbage and vermin
7 that these projects bring to our neighborhoods,
8 it's just -- it's very concerning. And the volume
9 of people, the families that are going to be
10 occupying the neighborhood is very concerning. We
11 have one train station. I don't know how all of
12 these people will fit into the train station.

13 So I appeal to you to please
14 reconsider the scale and the size of this project.

15 Thank you.

16 (Applause.)

17 THE CHAIR: Thank you.

18 Tom Angotti. To be followed by
19 Vaylateena Jones.

20 MR. ANGOTTI: My name is Tom
21 Angotti. I'm a professor of urban policy and
22 planning at Hunter College Graduate Center here.
23 And I have five points. I'm going to be very
24 brief. I have written testimony I'll give you with
25 more detail.

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2 The first is, this is not a
3 minor modification. It boggles the mind. It makes
4 no sense at all to call this a minor modification,
5 a large scale residential development. This is a
6 major modification. You're dumping 70 story
7 buildings, 2.5 million square feet of residential
8 space in a two block area and calling it a minor
9 modification. This must be a full ULURP. And the
10 City Planning Commission must do its duty as laid
11 out in the City Charter and look at the long term
12 consequences of changes, major changes in the
13 distribution of floor area in one neighborhood as
14 well as throughout the city.

15 Second point. The scope of work
16 does not consider the context of Chinatown. I
17 didn't hear that word once. But it only aggregates
18 the blocks into a quarter mile radius or a half
19 mile radius. This is not sufficient. This is an
20 historic neighborhood. And it has been there for
21 generations. And the scope of work must examine
22 the history and the full context of Chinatown's
23 development and the pressures it is currently
24 facing of gentrification and displacement. When
25 you consider neighborhood character, you have to

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2 consider Chinatown.

3 Third point. As was stated
4 before, this is in a flood plain. There's an
5 extreme flood risk. It is not an acceptable
6 solution to look at as mitigation the elevation of
7 the building above the maximum known flood plain
8 today because there is incredible uncertainty about
9 the extent of flooding that Lower Manhattan will be
10 subjected to over the next thirty years. So, and
11 it is also an example of environmental injustice to
12 consider elevating this building, while the rest of
13 the surrounding homes and neighborhood are
14 subjected to the dangers of sea level rise and
15 flooding.

16 Fourth point. Air quality and
17 noise. It boggles the mind that --

18 (Bell rung.)

19 THE CHAIR: If you could wrap
20 up, please.

21 MR. ANGOTTI: Okay.

22 THE CHAIR: One more sentence,
23 please.

24 MR. ANGOTTI: You're within two
25 hundred feet of an expressway. And the solution

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2 cannot be, to protect air quality and noise, to
3 close the buildings and hermetically seal them.

4 And then finally, consider -- as
5 an alternative you must consider the Chinatown
6 Working Group's Community plan that took almost 70
7 years to develop.

8 (Applause.)

9 THE CHAIR: Thank you.

10 Our next speaker is Vaylateena
11 Jones. To be followed by Tanya Castro-Negron.

12 MS. JONES: Hi. My name is
13 Vaylateena Jones. I'm a member of the Lower East
14 Side Power Partnership and I've been a resident of
15 the Lower East Side for more than 50 years.

16 In terms of socioeconomics, zip
17 10002, according to one source the AMI is 33,000,
18 which is less than zip 10003, 9, 13 New York and
19 New York County. So we would like that the portion
20 of affordable housing consider the AMI of zip
21 10002.

22 Also, we would like
23 consideration in terms of affordable housing that
24 there be something affordable for somewhat middle
25 income folks, such as firefighters, nurses, police

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2 officers, sanitation workers, teachers, from entry
3 to seniority.

4 In terms of jobs, in terms of
5 socioeconomics, we would like that there be union
6 jobs for the people from zip 10002 and we would
7 like a breakdown as to how many people actually do
8 get jobs.

9 In terms of secondary
10 displacement, 410 Grand Street had 104 evictions,
11 460 Grant Street had 93 evictions, and these are
12 both in Grant Street guild. 82 Rutgers Street had
13 135 evictions from 2013 to 2015. The people of the
14 Lower East Side are very anxious because we thought
15 these were rent restricted developments where this
16 happened. And so we would like an analysis of
17 secondary displacement to include housing that is
18 subjected to rent restrictions.

19 In terms of health care,
20 District 3 is one-fifth of the Medicaid population
21 of the Borough of Manhattan. The district, which
22 is about -- Medicaid is basically saying they want
23 to achieve a 25 percent reduction in avoidable
24 hospital use, including emergency rooms. The Lower
25 East Side, the closest urgent care is CityMD on

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2 Delancey, which limits -- they do not accept
3 straight Medicaid. We were expecting a development
4 by NYU. NYU did not meet the requirements to be a
5 safety net because they did not accept more than 25
6 percent of their visits inpatient or outpatient, of
7 Medicaid people. So we would like an analysis in
8 terms of health care.

9 We also agree with other people
10 that have said in terms of the Chinatown Working
11 Group. One of the things that that report says is
12 that new housing construction on -- that rents will
13 not substantially alter the present mix of income
14 groups or reduce the number of units. Another
15 statement is that existing buildings or structures
16 to be in scale and not seriously alter the city
17 amenities. We believe that these are concepts for
18 any development, any community that you're
19 developing in. So we would like you to also
20 consider those aspects of the Chinatown Working
21 Group.

22 Oh, let me just say, I'm a
23 nurse. And I find it is absolutely disgusting,
24 disgusting, the concept of how they plan to do --
25 these elderly people that live on Rutgers Street.

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2 That is absolutely unacceptable.

3 (Applause.)

4 MS. JONES: We previously wrote
5 a letter --

6 (Applause.)

7 MS. JONES: -- saying that we
8 wanted, that we wanted --

9 (Applause.)

10 MS. JONES: -- we wanted each
11 senior --

12 (Bell rung.)

13 MS. JONES: -- or relative to be
14 contacted. We wanted the Borough President's
15 office to make sure that all seniors were afforded
16 an English translator. And that all seniors, that
17 the Borough President's office was informed of who
18 was displaced and when they are replaced to their
19 home. And we put this in writing and so we sent it
20 to you. But to me that is absolutely disgusting.
21 Any society that does not take care of its elderly
22 is disgusting.

23 (Applause.)

24 THE CHAIR: Thank you.

25 The next speaker is Tanya

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2 Castro-Negron. To be followed by David Nieves.

3 MS. CASTRO-NEGRON: Hello. My
4 name is Tanya Castro-Negron. And I am here as a
5 resident and community leader. And I'm here
6 speaking as a resident leader of Lands End 2
7 Resident Association.

8 We have preexisting conditions
9 today. We have preexisting conditions in our
10 community, we have preexisting conditions on the
11 Lower East Side, we have preexisting conditions in
12 the area you're proposing these mega towers to come
13 into and destroy our community. I'm in opposition
14 because before proposing all of this, elected
15 officials have come to meetings, addressed
16 concerns, and disappeared. Today I ask you, the
17 elected officials, to speak on behalf of the
18 residents of Land's End 2, of 82 Rutgers, of 80
19 Rutgers, of 257 Clinton, now known as 275 South
20 Street, the schools in the surrounding area, which
21 I'll say now they're doing much better, but we're
22 failing. We have service needs. We have hospital
23 needs. We have needs, and none of these needs have
24 been addressed.

25 We don't want mega towers to

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2 come into our community. They do not fit the
3 character of our community. Luxury towers do not
4 fit the character of our community. I'm not sure
5 how Extell got in to do what they've done. There's
6 no documentation online to show how they got to
7 where they are today. But I'm in opposition of
8 anything that is not for our community.

9 I sat on the task force as a
10 resident leader. The information that was provided
11 was crucially helped to an extent. I spoke with
12 someone from DCP when the EAS and DSOW came out.
13 And I requested the determination of significance,
14 which basically explained what the negative impacts
15 are in a descriptive, detailed form.

16 Our community has been given a
17 lot of information, translation, timely
18 information. We've received -- you received the --
19 what was that last documentation? Oh, our building
20 were fliered a day ago. On the 22nd was when we
21 received the summary of the DSOW translated. The
22 purpose of the extension for this process was due
23 to translation. Our residents did not receive any
24 of that information. Why? Because we have a lack
25 of funds as resident leaders. And I feel that was

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2 the responsibility of the elected officials and DCP
3 to do that job yourselves.

4 I am serious that I had to get a
5 translation within a day, which was yesterday, for
6 some residents who attended. And unfortunately
7 they could not be here today because of
8 transportation here to One Centre Street,
9 especially for my Asian community, my Asian
10 families.

11 The scope of work should specify
12 each individual authorization or special permit
13 that must be issued for each separate tower
14 project. In addition, the data, information and
15 evidence developed in the EIS must support
16 affirmative findings under 78-313 for any changes
17 to Two Bridges Large Scale Residential Development
18 Plan. These approvals cover various zoning
19 elements such as bulk distribution floor area --

20 (Bell rung.)

21 MS. CASTRO-NEGRON: -- air,
22 light, open space, setback and height, along with
23 others.

24 If I myself as just a resident
25 can go online and get the LSRD Article 7, Chapter 8

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2 zoning resolution, the positive declaration, the
3 EIS, the EAS and letter of intent, which again, you
4 guys did not provide, I don't see why we can't do
5 that for our community, which you're asking to bend
6 over and receive these level of towers.

7 Thank you.

8 THE CHAIR: Thank you.

9 The next speaker is David
10 Nieves. To be followed by Dashia Imperiale.

11 MR. NIEVES: Good afternoon. My
12 name is David Nieves. I am a community activist,
13 member of LESON, and also a resident of 64 Essex
14 Street in Seward Park Housing. I'm going to just
15 touch on three points; the zoning, shadows and
16 sewage.

17 The public housing residences
18 are sunlight sensitive resources. Since Jacob Riis
19 first published How the Other Half Lives, public
20 and affordable housing investment in New York City
21 has sought to overcome the darkness and despair of
22 early tenement housing. For over a century after
23 its publication, New York zoning laws were
24 repeatedly updated to assure all apartment rooms
25 have light.

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2 Public housing projects were
3 built in what is known as the tower in the park
4 style, an adaption of contemporary housing
5 complexes pioneered by Le Corbusier, to provide
6 L-shaped apartment design that came together tetrus
7 style and green open space, to ensure every unit
8 had light shining in the apartment throughout the
9 day.

10 These historic zoning and public
11 investment in housing remain sunlight sensitive
12 assets and must be evaluated as such within Two
13 Bridges shadows assessment. The shadows assessment
14 must be consistent with the findings under Section
15 78-313 of the zoning resolution of the City of New
16 York, and found in compliance with all applicable
17 subsections.

18 Sewage. The proposed mega tower
19 group project will be located in the drainage area
20 that feeds to the Newtown Creek Wastewater
21 Treatment Plant. The combined sewage and rain
22 water the from Lower East Side, along with areas
23 such as the Financial District, TriBeCa, Greenwich
24 Village, Chinatown, Midtown East, and the east side
25 up to 71st Street, flow through 180 miles of sewer

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2 and intersector pipes to the 13th Street pumping
3 station at 13th Street and Avenue D, from where it
4 is sent under the East River to Newtown Creek.

5 The Two Bridges mega tower
6 project EIS must assess the added load from three
7 mega towers to the entirety of the system affected,
8 including the capacity of piping systems to
9 transmit combined sewage and rain water to the
10 Newtown Creek Wastewater Treatment Plant, NCWWTB,
11 without violation of all permit requirements.

12 Interference with flow control, sewer backup
13 mitigation, access and fair usage by other
14 neighborhoods who must assess the piping overflow
15 basin and pumping capacity of the Newtown Creek
16 Drainage Area. These include Chinatown, the
17 Financial District, East Midtown, the Upper East
18 Side financial district, Chelsea, TriBeCa and all
19 other areas of east and Lower West Manhattan --

20 (Bell rung.)

21 MR. NIEVES: -- Newtown Creek
22 drainage area. If the rules apply, they must apply
23 to everyone.

24 Thank you.

25 (Applause.)

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2 THE CHAIR: Thank you,
3 Mr. Nieves.

4 Our next speaker is Dashia
5 Imperiale. To be followed by Alexander chow.

6 MS. IMPERIALE: Hello. My name
7 is Dashia Imperiale. I am an activist from the
8 Lower East Side. I lived here all my life.

9 I just want to know how you
10 could actually sit there without a backbone to tell
11 developers that minor and major modifications are
12 not new buildings. So that's my first question.

13 THE CHAIR: We are here to hear
14 your testimony today, not to answer your questions.

15 MS. IMPERIALE: But you can
16 answer, you can speak.

17 THE CHAIR: Not at this meeting.
18 That's not the format.

19 MS. IMPERIALE: Okay. Well, I
20 do not think that minor and major modifications are
21 new buildings.

22 Finish work is not new
23 buildings. The terminology that you're using and
24 the language you're using to benefit developers is
25 a disgrace. If developers want to come into this

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2 community, they must give back to the community.

3 Currently there's going to be an
4 overcrowdedness in schools. There is about 634
5 seats for elementary students. Where are all these
6 students going to go? From Essex Crossings to the
7 buildings that you're proposing, where are the
8 students going to go? We don't know.

9 You're creating problems in the
10 community like overcrowding, you're going to create
11 primary and secondary displacement. And it's not
12 fair. Because you're coming to the City of New
13 York asking to get land, barely paying taxes on it,
14 and at the end of the day, it's like a real estate
15 Ponzi scheme. You're just taking, taking, taking
16 and you're not giving anything back.

17 (Applause.)

18 MS. IMPERIALE: It's not
19 something to smile about. It's something to frown
20 on. It really is. Because at the end of the day
21 you're hurting communities that have lived here all
22 their lives, you're hurting seniors and you're
23 hurting people. And it's disgusting. And we're
24 not just going to sit here and we're not just going
25 to take it. We are going to fight and we are going

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2 to organize and we are going to come to a
3 compromise where you can develop, but not 88 story
4 buildings.

5 And the reason they don't need
6 parking is because the train station is very close
7 by. And in zoning, when the train station is a
8 certain feet close by to parking, you don't need
9 any kind of cars. So basically the City of New
10 York is telling you you don't need a car, you need
11 to bicycle around because according to zoning rules
12 you can just walk to the train station. I don't
13 think that's fair. And at the end of the day, if
14 you're going to come and develop, then you should
15 pay taxes because you're going to make the City of
16 New York bankrupt. It's --

17 (Applause.)

18 MS. IMPERIALE: I still have
19 some time. So it's like --

20 (Bell rung.)

21 THE CHAIR: I think you spoke a
22 little bit too soon.

23 MS. IMPERIALE: Oh. Well, I
24 just want to say developers should, you know, give
25 back to the community and not be parasites and not

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2 treat the poor people as the host, because then
3 they become the biggest welfare recipients around.

4 Thank you very much.

5 THE CHAIR: Thank you.

6 (Applause)

7 THE CHAIR: Our next speaker is
8 Alexander Chow, to be followed by Irene Shen.

9 Just a reminder to everyone. We
10 are here to listen to all or your comments, and
11 we'll be responding to all of your comments in the
12 final scope of work.

13 MR. CHOW: Hi. My name is Alex.
14 I'm a resident of Two Bridges, and I've lived in
15 the neighborhood since I was two years old. I'm
16 now a college student, majoring in civil
17 engineering. My main concern with all the building
18 going on is related to the sewer system. The
19 reason I decided to study engineering was because
20 of the issues with our sewage system.

21 The current sewage systems can
22 be backed up and clog easily. When this happens,
23 our sewage ends up contaminating our rivers. This
24 contamination can also occur when there's a heavy
25 downpour and flooding in the area, which my area is

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2 prone to, due to climate change. Given these
3 current problems in our sewer system, how will it
4 handle the influx of new residents when all these
5 new buildings go up. And if new infrastructure
6 improvements and modifications are needed, who will
7 end up paying for all these?

8 Thank you.

9 (Applause.)

10 THE CHAIR: Thank you.

11 Our next speaker is Irene Shen.

12 And she'll be followed by Daisy Echevarria.

13 MS. SHEN: Good afternoon. My
14 name is Irene Shen. And I'm a member of the Lower
15 East Side Organized Neighbors.

16 First I'd like to speak on the
17 zoning issues, or some of them.

18 The DCP notice and the draft
19 scope of work both fail to describe in sufficient
20 detail the exact nature of authorizations for
21 special permits required were actually sought for
22 the mega tower group. In addition, based on the
23 procedures for the Two Bridges LSRD plan and
24 permits first issued by the City Planning
25 Commission in CP-21885, further authorizations and

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2 special permits are only granted after public
3 hearing investigation and a study that provide
4 adequate legal basis to determine that such
5 authorizations and special permits, quote, "conform
6 with the findings required under Section 78-313 of
7 the zoning resolution," end quote, and a resolution
8 is published by the CPC confirming such findings.
9 The legal responsibility to follow these procedures
10 are separate from the environmental impact analysis
11 process. The notice makes further assertions that
12 appear to either confuse, conflate, overlook or
13 disregard the clear procedures and requirements of
14 the controlling zoning regulations.

15 I also want to speak to shadows.
16 It's already been noted that public housing should
17 be treated as sunlight sensitive resources. But
18 we've never seen any kind of analysis of adverse
19 impact of shadows on the existing buildings by the
20 proposed mega towers. This was done in previous
21 plans for the plans for the original Health Care
22 Chaplaincy building, demonstrated here. But we've
23 never seen anything similar to that for these
24 proposed mega towers.

25 I also want to say that the

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2 scope of work really should include the Chinatown
3 community and the adverse impact to that part of
4 the neighborhood as well as we see the community as
5 one whole.

6 And lastly, the alternatives
7 should really consider the Chinatown Working Group
8 Plan, which protects the community in its entirety
9 as the alternative.

10 Thank you.

11 (Applause.)

12 THE CHAIR: Our next speaker is
13 Daisy Echevarria. To be followed by Aaron
14 Gonzalez.

15 MS. ECHEVARRIA: My name is
16 Daisy Echevarria. I'm a resident at 275 South
17 Street. And I'm here to represent Land's End
18 Tenant association in our community.

19 First, I want to address
20 traffic.

21 Due to the proximity of our
22 neighborhood's name sake, the Bridges, traffic is
23 horrendous and dangerous. Cherry Street receives
24 an overflow of traffic when the FDR is congested.
25 Clinton Street is backed up from Delancey Street to

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2 the FDR with vehicles trying to get to the
3 Williamsburg Bridge. What impact will the projects
4 have on these traffic flows?

5 With the beautification of our
6 neighborhood continuing, more tourists than ever
7 before are visiting. Tourists are not limiting
8 themselves to weekday a.m. midday and p.m. peak
9 periods. There are also many out of town visitors
10 going to Basketball City events or the cruise boat
11 launch. Tour buses drop off passengers at the
12 intersection of South and Montgomery Streets. This
13 causes both foot and vehicle traffic. There needs
14 to be traffic analysis on the weekends,
15 particularly when Basketball City is having an
16 event.

17 Improvement measures that only
18 identify high accident locations are not enough.
19 For every accident, there were countless near
20 misses. Any accident victim is one victim too
21 many. Human life should not be reduced to a mere
22 statistic. For this reason, we need to expand the
23 study area to a half mile boundary.

24 (Applause.)

25 MS. ECHEVARRIA: Let's comply

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2 with Mayor de Blasio's Vision Zero. We need to be
3 proactive in preventing fatalities or serious
4 injuries in our city streets. Without cameras,
5 nothing will deter vehicles and their frustrated
6 drivers from disobeying the rules of the road.
7 Therefore, anything that can be done to protect
8 pedestrians should be implemented.

9 The simplest approach would be
10 to stop -- to put stop signs, two way or three way,
11 at all pedestrian crossings with bright crosswalk
12 markings on the street. With almost 9,000 new
13 residents, and every life precious, it is
14 imperative that Vision Zero in the Two Bridges
15 neighborhood become a reality --

16 (Bell rung.)

17 MS. ECHEVARRIA: -- right now.

18 The neighborhood character, very
19 quick. The Two Bridges --

20 THE CHAIR: So one sentence,
21 please.

22 MS. ECHEVARRIA: Sorry. Okay.

23 The Two Bridges neighborhood has
24 been a working neighborhood, affordable and
25 ethnically diverse section of New York. Many of

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2 the residents, both short and long term, have cited
3 the family atmosphere as the reason they move and
4 stay here. Its character will change with these
5 developments. The heights of these structures are
6 overwhelming us. They're absolutely out of
7 proportion, with no regard to the surrounding area.

8 Neighborhood character is
9 directly tied to its socioeconomic character.
10 Unfortunately, with the upper economic class, an
11 inherent sense of entitlement is prevalent. That's
12 why there are affordable buildings. Or, as in
13 Extell's case, the millionaires moving in will
14 happily be completely isolated from the working
15 class. There will be changes to our neighborhood
16 character, not changes we want. Should we be
17 welcoming? The Indians of Manhattan were
18 welcoming. Where are the --

19 THE CHAIR: If you could wrap
20 up, please.

21 MS. ECHEVARRIA: Okay. So --

22 THE CHAIR: We'll be reviewing
23 your written testimony.

24 MS. ECHEVARRIA: Okay. So where
25 are the Guadajalos (sic) now. Thank you.

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2 (Laughter.)

3 THE CHAIR: Thank you.

4 Our next speaker is Aaron
5 Gonzalez. To be followed by Antonio Queylin.

6 MR. GONZALEZ: Hello. My name
7 is Aaron Gonzalez. I'm a member of the Land's End
8 Tenants Association. Thank you for the opportunity
9 to provide comments today.

10 The fact that we are here today
11 providing comments does not in any way mean that we
12 are in agreement with these projects being built.
13 As a representative of tenants of 275 South Street,
14 we state on their behalf that we are vehemently
15 opposed to these proposed developments. The DSOW
16 states that a future build year of 2021, when the
17 projects are anticipated to be completed and
18 operational, will be examined to assess the
19 potential impacts. With this data in mind, the
20 proposed study area needs to include the two
21 development sites being built or about to be built,
22 and the numbers should be added to all the EIS's.
23 These would be Extell's two buildings, with 1,000
24 units, and the Next Generation NYCH program at La
25 Guardia Houses. That building size is estimated at

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2 35 stories, another 500 units. And both of these
3 fall within the 400 -- for the boundary study area.
4 We are not getting a true EIS without these two
5 buildings added to the impact of all nineteen CEQR
6 categories.

7 These new high-rise developments
8 are being made for half lots, in direct contrast to
9 the original purpose of the Two Bridges
10 neighborhood. With 75 percent the new tenants
11 being market rate, and Extell's one to three
12 million dollar condominiums, the socioeconomic
13 character is going to drastically alter.

14 Two Bridges is a lower income
15 neighborhood. In 2015 the median household income
16 was approximately \$35,000. And 35.5 percent of the
17 population live below the poverty level. The
18 developers need to let us know what AMI percentage
19 they are going to use. They keep using the word
20 "affordable." Extell's million dollar condos are
21 affordable for some people. And when they come to
22 the Two Bridges neighborhood, the area median
23 income will forever be changed. Thereafter, when
24 HUD determines the new AMI, it will truly no longer
25 be affordable to us. This will result in indirect

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2 residential displacement.

3 That is why we feel the study
4 area should be increased to a half mile, and should
5 include:

6 Eviction data for the past five
7 years;

8 Complaints of landlord
9 harassment; and

10 Inventory of local requests for
11 right to counsel.

12 This data is available from
13 AMHD, ProPublica, and the Furman Center. We need
14 to look beyond income to levels of educational
15 attainment, rent burden, overcrowding, and
16 linguistic isolation to provide a more accurate
17 picture of those made vulnerable by the addition of
18 a new population of higher income.

19 Thank you.

20 (Applause.)

21 THE CHAIR: Thank you.

22 Our next speaker is Antonio
23 Queylin. To be followed by Marc Richardson.

24 MR. QUEYLIN: My name is Antonio
25 Queylin. I am a life-long resident of the Lower

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2 East Side. I'm a member of LESON and Land's End.
3 I just wanted to talk about involved and interested
4 agencies.

5 State law regarding
6 environmental quality review requires an EIS to
7 include involved and interested agencies.

8 Following agencies must be -- must be involved in
9 this DCP evaluation of impacts of this and related
10 projects. Department of Housing and Urban Renewal
11 regarding funding issues. The United States EPA
12 regarding the legal compliance requirements under
13 the Clean Water Act. The state Department of
14 Environmental Conservation regarding legal
15 compliance under the Clean Water Act. And FEMA
16 regarding flood plain construction issues.

17 Legally an EIS must contain the
18 evaluation of alternatives to the proposed action
19 that include a range of reasonable alternatives
20 that are feasible, considering the objectives and
21 capabilities of the project sponsor. The current
22 scope fails to meet this legal requirement, and
23 therefore, reasonable alternatives must be added.
24 In particular, the draft scope of work should
25 include alternative development options consistent

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2 with zoning, density, and neighborhood recognition
3 provisions laid out in the Chinatown Working Group
4 Rezoning Plan.

5 The Chinatown Working Group Plan
6 has widespread support throughout the community,
7 and includes a specific provision for the Two
8 Bridges Area Subdistrict D:

9 A height limit of 350 feet;
10 An anti-harassment and
11 anti-demolition certification would guarantee at
12 least 50 percent affordable housing be new
13 development at local AMI;

14 Climate change resilience,
15 Architecture, landscape and open space features to
16 accommodate sea level rise and water retention, I'm
17 sorry, detention, including green infrastructure
18 and retention tanks.

19 I'd like to address the DCP and
20 ask you, if they do their jobs properly and fairly,
21 because you work for all of New York, not just the
22 well-to-do and the luxury developers, the
23 cumulative impact of these new projects -- of these
24 new projects and the residents --

25 (Bell rung.)

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2 MR. QUEYLIN: -- that they'll
3 bring, has not taken into account gas emissions of
4 cars, floods, lack of services, hospitals, parking,
5 schools, transportation and other essential
6 services.

7 Thank you.

8 THE CHAIR: Thank you.

9 (Applause.)

10 THE CHAIR: Our next speaker is
11 Marc Richardson. To be followed by Zishun Ning.

12 MR. RICHARDSON: Hello, City
13 Planning Commission. My name is Marc Richardson.
14 I'm here representing the Land's End One Tenants
15 Association and Tenants United, fighting for the
16 Lower East Side, as well as representing myself as
17 a long term resident of the Two Bridges community.

18 Based on survey data captured by
19 the Two Bridges task force co-chaired by Manhattan
20 Borough President Gale Brewer's office and Council
21 Member Margaret Chin's office, analysis and
22 consultation provided by the Collective for
23 Community, Culture and Environment, and various
24 engagements with our community and subject matter
25 experts, we wanted to highlight the following in

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2 this testimony.

3 With regard to socioeconomic
4 conditions and neighborhood character, the direct
5 residential displacement should include specific
6 relocation plans for the residents of the ten units
7 at 80 Rutgers that would be relocated, including
8 how relocation costs or any other associated costs
9 will be handled and by whom. Indirect residential
10 displacement should enlarge the study area to a
11 half mile, and boundaries should include adjacent
12 neighborhoods like Chinatown and the Lower East
13 Side.

14 In addition to census data, RPAD
15 and current real estate market data, they should
16 also add information that is more relevant to
17 displacement specifically, such as ProPublica and
18 other data that's cited here today, the impact of
19 these projects on people of color, low income
20 families, immigrants, rent stabilized and
21 affordable housing is important and needs to be
22 studied thoroughly.

23 With regard to land use zoning
24 and public policy, the study area also should be
25 increased to a half mile and need not be a perfect

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2 geometric circle.

3 With regard to community
4 facilities and services, the number of units being
5 added effectively represents a whole new
6 neighborhood. Or, as some would say, it should
7 require rezoning or upzoning. And thus fire,
8 police, school, child care facilities, libraries,
9 youth and after school programs, centers and
10 services for the elderly, among others, should be
11 studied thoroughly.

12 Considering the new Extell
13 building that already towers over the Manhattan
14 Bridge, and what our stretch of the waterfront
15 would look like with these five new towers, I'm
16 frankly concerned about the Two Bridges community
17 becoming a new soft target for terrorism. I don't
18 know where this belongs in your technical areas of
19 study, but I think it's something that requires
20 some kind of security assessment.

21 (Bell rung.)

22 THE CHAIR: If you could
23 conclude, please.

24 (Applause.)

25 THE CHAIR: One more sentence.

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2 MR. RICHARDSON: In closing, I'd
3 like to associate myself and support the more
4 comprehensive statements that I've had an
5 opportunity to see or preview and will likely be
6 submitted during this process, provided by CB 3,
7 the Collective for Community, Culture and
8 Environment, and the Two Bridges Community Task
9 Force. Thank you.

10 THE CHAIR: Thank you.

11 (Applause.)

12 THE CHAIR: Our next speaker is
13 Zishun Ning. To be followed by Martin Rosenberg.

14 MR. NING: My name is Zishun
15 Ning. And I see myself as part of the community of
16 the Lower East Side.

17 Like many people from the
18 community, I see these proposed mega towers as an
19 insult. And the City's efforts to address the
20 issue has been disingenuous. The points of
21 criticism are many, and here are just some.

22 The state law regarding the
23 environmental quality review requires an EIS to
24 include involved and interested agencies. The
25 following agencies must be involved in the DCP

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2 evaluation of the impact of this and related
3 projects:

4 The Department of Housing and
5 Urban Development, HUD, regarding funding issues;

6 The U.S. EPA regarding legal
7 compliance requirements under the Clean Water Act;

8 The state Department of
9 Environmental Conservation regarding legal
10 compliance requirements under the Clean Water Act;
11 and

12 FEMA, regarding for planning
13 construction issues.

14 Legally, an EIS must contain an
15 evaluation of, quote, "alternatives to the proposed
16 action", unquote. That includes a, quote, "range
17 of reasonable alternatives that are feasible,
18 considering the objectives and capabilities of the
19 project sponsor," end quote. The current scope
20 fails to meet these legal requirements, and
21 therefore, a reasonable alternative must be added.

22 In particular, the draft scope
23 of work should include alternative options
24 consistent with zoning, density, and neighborhood
25 recognition provisions laid out in the Chinatown

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2 Working Group Rezoning Plan. The Chinatown Working
3 Group plan has widespread support throughout the
4 community, and includes the following specific
5 provisions for the Two Bridges area, known as
6 Subdistrict D:

7 A height limit of 350 feet;

8 An anti-harassment and
9 anti-demolition certification;

10 A guarantee of at least 50
11 percent affordable housing in new developments at
12 local AMI;

13 Climate change and resilience in
14 architecture, landscape, and open space features to
15 accommodate sea level rise and water retention,
16 including green infrastructure and retention tanks.

17 Thank you.

18 (Applause.)

19 THE CHAIR: Thank you.

20 Our next speaker is Martin
21 Rosenberg.

22 MR. ROSENBERG: That's my name.

23 Ask me again, I'll tell you the same. I won't bore
24 you with long speeches, I'll bore you with short
25 ones.

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2 First I want to bring up
3 something from the mission of the poly and
4 technical college from 2014, I was up there. And
5 the first thing and the main thing, I'm a member --
6 I'm a member of the -- a resident of the Lower East
7 Side. And security cameras, and whoever you speak
8 to and they tell you oh, it's expensive, go in and
9 price a loaf of bread today and find out how much
10 it is next Thursday. Fine. But I guarantee, the
11 way I see these drivers, the price of the cabs may
12 be expensive. In six months guaranteed the city
13 will make their money back with interest. That's
14 then.

15 Now, we also have another
16 problem. The filth on the street. People the word
17 dirty, it's gone, filthy. I see -- here's
18 something that I bring up to people when they're
19 talking about oh, they're going to charge five
20 cents more for a bag. Guaranteed you're going to
21 see the bags on the street no matter how much they
22 charge. That's bad enough.

23 Issues. Children eating pizza
24 on the what do you call it, the paper plate. Don't
25 they have any respect? And these are not children

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2 who are by themselves, they are with their parents.
3 Ma, what should do I with this, there. This is not
4 right.

5 Today I look around at all the
6 people in this building -- in this room right now,
7 I'm 80 years old. I believe I'm the oldest person
8 here. I hope I am. But anyway, I just want to say
9 the way these children are brought up today, the
10 children tell the parents what to do. I'm 80, my
11 brother is 76. If we told my father, if we
12 objected to them, it's the same; we wouldn't be
13 here today. It's not a different world, it's
14 different people.

15 Also, the filth. The Madison
16 Street side of the -- Madison and Jackson, filthy.
17 People come in with their bottles, fine, I can
18 understand that. But the manager, many a times I
19 says to him, you know, the streets are filthy
20 around where they come in with their bottles and
21 everything. Clean it up, get somebody to clean it
22 up. Oh, Marti, no problem, I'll get somebody. It
23 goes through deaf ears, right.

24 Another thing is, besides
25 throwing the little things down in the street,

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2 pizza boxes. Ma, what should I do with it. Throw
3 it over there. I mean, pick it up, bring it into
4 your house.

5 In the building where I live,
6 this is about six months ago, right in the
7 elevator, a woman took off the package, the wrapper
8 from a Hershey chocolate and threw it on the floor.
9 I said do you live here? Yes, I do. I said take
10 it up to your house and throw it in the garbage. I
11 couldn't believe what came out of her mouth. She
12 said if I didn't do that, maintenance wouldn't have
13 anything to do.

14 (Bell rung.)

15 MR. ROSENBERG: And these are
16 things that --

17 THE CHAIR: If you could wrap up
18 now. One more sentence.

19 MR. ROSENBERG: Okay. I thank
20 you very much.

21 THE CHAIR: We thank you.

22 (Applause.)

23 THE CHAIR: Our next speaker is
24 Moi Hung. M-o-i, H-u-n-g. To be followed by Alice
25 Cancet.

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2 AUDIENCE MEMBER: Cancel.

3 THE CHAIR: Cancel.

4 Good afternoon.

5 MS. HUNG: Good afternoon, hi.

6 My name is Moi Hung. I'm working for HRA. I
7 graduated 1996 from upstate New York, RPI. I have
8 engineering degree.

9 So I wonder if this building
10 that's going to be next to 275 South Street, how
11 close is it going to be, because when my -- when I
12 worked for my first job in electrical, we designed
13 submarine for U.S. Navy, and we talk about safety
14 factor. And I want to know, this building so close
15 to our building, how is it going to affect us under
16 any kind of natural disaster or snow or earthquake.

17 I also talked to my parents, who
18 have been living in this building for almost twenty
19 years, and my relatives who live upstairs. They
20 are concerned about it, but they gave up the chance
21 to come here to speak because they think this is
22 just a formality. They don't think our voice will
23 be heard. They don't think you will listen to us.
24 They feel hopeless. I want to deliver their
25 message to you, because it's very frustrating, and

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2 we know it's going to cause a lot of hazard, sewage
3 and everything everybody been talking about before
4 me. And I hope our voice could be heard.

5 Thank you.

6 (Applause.)

7 THE CHAIR: Our next speaker is
8 Alice Cancel.

9 MS. CANCEL: Good afternoon,
10 everyone. My name is Alice Cancel. And I am the
11 district leader and a long time resident in this
12 community.

13 I am sorry to inform the
14 Department of City Planning that has no credibility
15 and you are out of control in our community.

16 (Applause.)

17 MS. CANCEL: All the development
18 that are choking our community is directly the
19 fault of your department.

20 The City is already in violation
21 of the federal EPA as far as the sewage treatment.
22 This until today still has not been resolved.

23 The shadows cast by the
24 monstrosities that we have in our community, our
25 children in the shade of the darkness. We today

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2 need the independent study because of lack of trust
3 that you have encouraged.

4 One of the goals of public
5 housing was to provide sunlight that the old
6 tenements lacked in our community.

7 Until these issues and many
8 others are resolved, our community cannot and will
9 never support such a project in this community.

10 (Applause.)

11 MS. CANCEL: This has been a
12 devastating insult in our community. Thank you.

13 (Applause.)

14 THE CHAIR: Thank you.

15 That's the last of our
16 registered speakers. Is there anyone else who
17 would like to speak at this session?

18 (No response.)

19 THE CHAIR: I'd just like to
20 remind everyone that we'll be having an evening
21 session starting at six. And the written comment
22 period will remain open until the close of business
23 on Thursday, June 8th.

24 We have another speaker?

25 MS. JONES: No, no. This is not

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2 accessible. Is there going to be an opportunity
3 for accessibility? I mean, I had to walk up a
4 flight of stairs.

5 THE CHAIR: There is an elevator
6 available, yes.

7 MS. JONES: There is an
8 elevator? Oh, okay, I'm sorry. I didn't know
9 where it was, okay. No, they're saying over there
10 somewhere.

11 THE CHAIR: Yes.

12 MS. JONES: Okay. They don't
13 know that downstairs, okay.

14 THE CHAIR: Again, I'd like to
15 remind everyone that the public comment period will
16 remain open until Thursday, June 8th. And we
17 encourage everyone to submit written comments.
18 There's no limit on the length of written comments.

19 And, in closing, I'd just like
20 to thank everyone for coming. The session is now
21 closed.

22 (Time noted: 3:52 p.m.)
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C E R T I F I C A T E

STATE OF NEW YORK)
) SS:
COUNTY OF NEW YORK)

I, KARI L. REED, a Registered Professional Reporter (Stenotype) and Notary Public with and for the State of New York, do hereby certify:

I reported the proceedings in the within-entitled matter and that the within transcript is a true record of such proceedings.

I further certify that I am not related, by blood or marriage, to any of the parties in this matter and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my han *Kari L. Reed* June, 2017.

KARI L. REED

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THE CITY OF NEW YORK
DEPARTMENT OF CITY PLANNING

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RE: Two Bridges LSRD EIS
Public Scoping Meeting

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1 Centre Street
2nd Floor Mezzanine
New York, New York

May 25, 2017
6:05 p.m.

B E F O R E:

ROBERT DOBRUSKIN, Chair

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A P P E A R A N C E S:

For Department of City Planning:

ROBERT DOBRUSKIN, Director of EARD

JOEL KULKMANN, Senior Planner of EARD

SAMUEL NOURIELI, EARD Project Manager

ERIK BOTSFORD, Deputy Director Manhattan office

For AKRF:

LISA LAU, Senior Vice President

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2 P R O C E E D I N G S

3 MR. DOBRUSKIN: Good evening,
4 everyone. We're going to get started, if you
5 could please take your seat.

6 Welcome. Thank you all for
7 coming. And for those of you who were here at
8 the afternoon session, thank you for coming
9 back.

10 This is the public scoping meeting
11 for the Two Bridges Large Scale Residential
12 Development, or LSRD, proposal.

13 Let me just note for the record
14 the City Environmental Quality Review or CEQR
15 application number for the proposal is
16 17DCP148M.

17 Today's date is Thursday, May 25,
18 2017, and the time is approximately 6:05 p.m.

19 I'm Robert Dobruskin. I'm the
20 director of the Environmental Assessment and
21 Review Division for the New York City
22 Department of City Planning, and I'll be
23 chairing this evening's scoping meeting.

24 The Department of City Planning is
25 acting on behalf of the City Planning

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2 Commission as the lead agency for the
3 proposal's environmental review.

4 As lead agency, the Department
5 will be responsible for overseeing the
6 preparation and completion of the
7 Environmental Impact Statement or EIS, for the
8 Two Bridges proposal.

9 Joining me tonight are several of
10 my colleagues from the Department of City
11 Planning. Samuel Nourieli, who's sitting next
12 to me, is the environmental review project
13 manager in the Environmental Assessment and
14 Review Division. Sitting next to him is Joel
15 Kulkmann. He's the senior planner in the
16 Manhattan office of city planning. And last
17 but not least, at the end of the table, is
18 Erik Botsford, who's the deputy director of
19 the Manhattan office of city planning.

20 Together we're all here to receive
21 your comments on the Draft Scope of Work for
22 the Two Bridges EIS.

23 The Draft Scope of Work identifies
24 all the subjects that will be analyzed in the
25 upcoming EIS and describes how those studies

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2 will be conducted.

3 For those of you who might not
4 have seen the draft scope yet, we have some
5 copies available at the sign-in desk, and you
6 can also view it on the Department of City
7 Planning website.

8 The purpose of scoping is to allow
9 for public participation in the environmental
10 review process at the earliest stage possible.
11 Scoping provides an opportunity for the public
12 to have input in the preparation of the EIS
13 before the EIS is prepared. And toward that
14 end, we'll have an opportunity tonight to
15 receive comments on the draft scope from
16 elected officials, government agencies,
17 community board representatives and members of
18 the public.

19 We'll also have an opportunity
20 today to receive written comments on the draft
21 scope. You may give us your written comments
22 today or submit them through the end of the
23 written comment period. The written comment
24 period will end at the close of business on
25 Thursday, June 8th.

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2 After the close of the public
3 comment period, the Department, as lead
4 agency, will consider all of the comments that
5 we receive, those that we hear at today's
6 scoping meeting as well as all written
7 comments. We review all comments very
8 carefully and then determine what changes, if
9 any, need to be made to the draft scope of
10 work. We'll then issue a final scope of work,
11 and it's the final scope of work that will
12 serve as the basis for preparing the EIS.

13 As I mentioned, this is the
14 evening session of the scoping meeting. We
15 had an afternoon session. This session, like
16 the afternoon session, will be divided into
17 three parts.

18 During the first part, the
19 applicant team will make a brief presentation
20 describing the proposal as well as summarizing
21 the draft scope of work.

22 During the second part of the
23 meeting, we'll receive comments from elected
24 officials, community board representatives and
25 government agencies.

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2 During the third and final part of
3 the scoping meeting, we'll receive comments
4 from members of the general public.

5 If you want to speak tonight,
6 you'll need to fill out a speaker's card.
7 Those are available at the sign-in desk.
8 Speaking time will be limited to three
9 minutes. We'll let you know when your three
10 minutes are up by ringing a bell, and when we
11 ring the bell, we ask you kindly to conclude
12 your remarks.

13 We also ask that you limit your
14 comments specifically to the draft scope of
15 work. We want to know your comments on the
16 draft scope. Tell us what you think should be
17 studied from the draft scope and how you think
18 those studies should be conducted.

19 So now I'm going to turn things
20 over to the member of an applicant team who
21 will begin the presentation.

22 MS. LAU: Thank you. I'm Lisa
23 Lau, senior vice president at AKRF. I'm part
24 of the project management team for the
25 preparation of this Environmental Impact

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2 Statement or EIS.

3 The EIS will be analyzing three
4 separate proposals by three separate applicant
5 teams. I'll describe these projects briefly
6 before discussing the EIS process.

7 The three applicants, Cherry
8 Street Owner, LLC, Two Bridges Associates, LP,
9 and LE1 Sub, LLC, each seek to develop new
10 mixed-use buildings within the Two Bridges
11 Large Scale Residential District, LSRD,
12 located in the Lower East Side neighborhood of
13 Manhattan in Community District 3.

14 The Two Bridges LSRD was
15 originally approved by the City Planning
16 Commission in 1972 and governs development
17 within its boundaries. The site numbering
18 we're using in this presentation and will use
19 in the EIS corresponds with the numbering of
20 sites in the Two Bridges LSRD.

21 The 247 Cherry Street project is
22 proposed for the Two Bridges LSRD Site 4,
23 4A/4B, which comprises Block 248, Lots 15, 70
24 and 76. The new development would be located
25 at Rutgers Slip and Cherry Street and would

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2 contain up to 660 residential units as well as
3 10 units relocated from the existing 80
4 Rutgers Slip building on the site.

5 The proposed building will be
6 approximately 79 stories tall and would
7 cantilever over a one-story retail building on
8 the site as well as the existing 80 Rutgers
9 Slip building, portions of which would be
10 integrated into the new building.

11 Approximately 3,214 square feet of new retail
12 would be introduced into the base of the 80
13 Rutgers Slip building.

14 The 260 South Street project is
15 proposed for Two Bridges LSRD Site 5, which
16 comprises Lots 1 and 2 of Block 247. The new
17 development on the site on South Street east
18 of Rutgers Slip would provide up to 1,350
19 residential units and approximately
20 17,000 square feet for community facility use.
21 The project would maintain the 103 surface
22 parking spaces that currently exist on the
23 site, relocating these spaces to a garage in
24 the lower level of the proposed building.

25 The proposed project also would

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2 create one-story expansions of the existing
3 buildings at 265 and 275 Cherry Street for
4 retail use. The proposed building would have
5 two towers reaching a height of approximately
6 69 stories from a shared base.

7 The 259 Clinton Street project is
8 proposed for Two Bridges LSRD Site 6A, which
9 comprises Lots 1 and 5 of Block 246. This
10 development at Clinton and South Streets would
11 include up to 765 residential units and
12 approximately 2,500 square feet of retail use.
13 The proposed building on this site would be
14 approximately 62 stories tall.

15 25 percent of all proposed
16 residential units would be permanently
17 affordable, and all three projects would also
18 involve improvements to the existing private
19 open space and/or the creation of new private
20 open space as well as resiliency improvements.

21 The proposed projects each require
22 minor modification to the existing Two Bridges
23 LSRD. There are two types of approvals that
24 City Planning can grant when there are already
25 special permits in place.

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2 A major modification is needed
3 when a proposed building requires changes to
4 or waivers of the underlying zoning district
5 regulations.

6 A minor modification is needed
7 when a proposed building complies with the
8 underlying zoning and only needs to change an
9 approved site plan or other special permit
10 requirements.

11 In this case, the new mixed-use
12 developments on each of the three project
13 sites would comply with the underlying
14 district regulations applicable to the sites
15 under the zoning resolution. The modification
16 needed to facilitate the projects relate to
17 site plan and other controls of the Two
18 Bridges LSRD special permit but do not relate
19 to underlying zoning regulations.
20 Accordingly, the projects require minor
21 modifications.

22 The minor modifications are
23 discretionary actions by the CPC that are
24 subject to review under the City's
25 Environmental Review Quality Act, CEQR.

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2 The Department of City Planning,
3 acting on behalf of CPS as CEQR lead agency,
4 has determined that the proposed actions are
5 consider Type I under the State Environmental
6 Quality Review Act. Accordingly, a full
7 Environmental Assessment Statement and Draft
8 EIS Scope have been prepared. These documents
9 are available online at www.nyc.gov/planning.

10 The Draft EIS or DEIS will use the
11 City's CEQR Technical Manual as the general
12 guide on the methodologies and impact criteria
13 for evaluating potential effects on the
14 various technical areas of analysis. The CEQR
15 Technical Manual is a detailed guidance
16 document that sets the framework for
17 environmental reviews here in the City of New
18 York.

19 The Technical Manual outlines 19
20 technical areas that should be considered in
21 assessing a project's potential effects.

22 The draft scope of work for the
23 preparation of this DEIS proposes to examine
24 the proposed actions' potential effects on
25 these environmental areas of concern

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2 including:

3 Land use, zoning and public

4 policy;

5 Socioeconomic conditions;

6 Community facilities;

7 Open space;

8 Shadows;

9 Historic and cultural resources;

10 Urban design and visual resources;

11 Hazardous materials;

12 Water and sewer infrastructure;

13 Energy;

14 Transportation;

15 Air quality;

16 Greenhouse gas emissions;

17 Noise;

18 Public health;

19 Neighborhood character;

20 And construction effects.

21 Where the potential for

22 significant adverse project impacts is

23 identified, the DEIS will identify potential

24 mitigation measures and disclose those

25 significant adverse impacts that may be

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2 unavoidable.

3 The DEIS will also discuss
4 potential alternatives to the proposed
5 projects that would reduce or avoid the
6 potential for significant adverse impacts from
7 the proposed actions.

8 While the three proposed projects
9 are separate development proposals, their
10 potential environmental impacts are being
11 considered in a single EIS due to their
12 physical proximity and the likelihood of their
13 being constructed during the same time
14 periods. The analysis of all three projects
15 in one EIS will provide the lead agency and
16 the public with an understanding of the
17 cumulative impacts of the three projects.

18 For each of the relevant technical
19 areas for analysis, the DEIS will provide a
20 description of the existing conditions and
21 assessments of future conditions without and
22 with the proposed actions in 2021, which is
23 when the three projects are anticipated to be
24 completed and operational.

25 While the draft scope details the

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2 approach and methodology to be applied to each
3 of the relevant environmental areas of
4 analysis, I would like to highlight some of
5 the particular areas that the DEIS will
6 assess.

7 For socioeconomic conditions, the
8 analysis will consider the potential for the
9 proposed projects to affect the socioeconomic
10 character of the surrounding area, including
11 the potential for the projects to result in
12 direct or indirect displacement of residents
13 and businesses.

14 The community facilities and
15 services analysis will consider the potential
16 for the new resident and worker populations
17 created by the proposed projects to affect
18 public schools, publicly-funded childcare
19 facilities and public libraries.

20 For transportation, working in
21 consultation with the City Department of
22 Transportation and MTA, we will assess the
23 potential effects of the proposed projects on
24 the local transportation and transit networks,
25 as well as parking in the project area.

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2 The DEIS will also assess the
3 potential construction-related impacts. It
4 will describe a conceptual construction
5 schedule, identify the activities and
6 equipment used in each stage of construction,
7 and provide estimates of workers and truck
8 trips. It will also identify potential
9 staging locations and temporary sidewalk and
10 lane closures.

11 Because the three project sites
12 are located close to one another and the
13 project on Site 4, 4A/4B involves changes to
14 an existing residential building that will be
15 occupied during the construction period, the
16 consideration of construction impacts is
17 particularly important.

18 The construction chapter will
19 assess environmental concerns such as traffic
20 and pedestrians, air quality, hazardous
21 materials, and noise. Measures to minimize or
22 avoid potential construction impacts will be
23 identified.

24 As noted above, where significant
25 adverse impacts may result, we will identify

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2 mitigation measures and/or alternatives that
3 avoid or minimize those impacts.

4 In order to understand how the
5 cumulative impacts of the proposed projects
6 might change if one or more of the projects is
7 delayed indefinitely or ultimately not
8 pursued, the EIS will also provide a
9 qualitative analysis of certain permutations
10 in a separate chapter. This analysis will be
11 limited to evaluating specific technical
12 areas, locations or facilities for which
13 impacts and mitigation needs have been
14 identified under the cumulative impact
15 analysis of all three projects.

16 We are here to hear your comments
17 on the draft scope of work, so I'd like to
18 hand the floor back to Robert Dobruskin so we
19 can get started hearing from you.

20 Thank you.

21 MR. DOBRUSKIN: Thank you, Lisa.

22 So that concludes the first part
23 of the meeting, the presentation.

24 Now we're going to move on to the
25 second part; comments from elected officials,

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2 community board representatives and government
3 agencies.

4 So far we have one speaker in that
5 category, Jamie Rogers from Community Board 3.

6 MR. ROGERS: My name is Jaime
7 Rogers. I'm the chair of Manhattan Community
8 Board 3. I'm here tonight to read comments,
9 which are the synopsis of comments that were
10 passed at the full board meeting this Tuesday.
11 We have the written comments provided to you,
12 also we'll be submitting them online.

13 So to begin, these are comments
14 with respect to the Draft Environmental Impact
15 Statement of the draft scope of work with
16 respect to the Two Bridges Large Scale
17 Residential Zoning plan.

18 The proposed project will
19 introduce building forms to the neighborhood
20 that are new to the district and contrary to
21 mobile plans. These building forms were not
22 considered possible, considering the Large
23 Scale Residential Development plan that
24 governs the area.

25 The primary governance of the huge

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2 maps and plan of this site is the LSRD and the
3 underlying zoning. Considering the scale of
4 changes proposed, the determination of this
5 action as a minor modification of the LSRD
6 should not rest solely on the underlying
7 zoning.

8 The amendment of the LSRD plan is
9 not a minor modification. Before the final
10 scope is released, the CPC needs to better
11 explain and justify their decision on how they
12 reached their determination that the project
13 is a minor modification.

14 The rule used to determine this is
15 a minor modification, Title 62, Section
16 2-06(g)(5) Roman Numeral I of the zoning of
17 the City of New York does not say that this
18 project must be classified as a minor
19 modification, only that it may be classified
20 as a minor modification if the CPC so
21 determines.

22 And as I stated above, this is far
23 from minor modification given the current
24 neighborhood context and the scope of the
25 buildings proposed.

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2 I'd now like to go into several of
3 the mistakes and errors that we believe were
4 made in the drawings provided by the
5 developers that need -- and those
6 inconsistencies which call for a further
7 examination by the CPC.

8 So the drawings described by the
9 proposed action are not detailed enough. They
10 have errors and need improvements and
11 additions of the scope so the regulatory
12 action is clear. For example, Cherry Street
13 is both described as a wide and narrow street.

14 Clinton Street is an 80-foot
15 narrow street, which is actually contrary to
16 the Zoning Resolution that streets above 75
17 feet are wide streets.

18 South Street is described as a
19 70-foot narrow street, but it's unclear
20 whether that is measured based on the size of
21 the street excluding the bike lane or whether
22 it takes into account the fact that it
23 overlaps with FDR Drive.

24 In addition, it is -- because of
25 these inconsistencies with the streets, it's

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2 unclear if the developments are completely
3 as-of-right under the C6-4 zoning. The
4 presentations provided seem to be cobbled
5 together by different developers using
6 different standards, and the lead agency
7 should select a standard and then instruct the
8 individual developers to submit drawings that
9 follow the single standards so the scope of
10 the project is clearly disclosed to the
11 public.

12 So we'll go now to the specific
13 pieces of the scoping that we believe should
14 be examined.

15 Under land use zoning and public
16 policy, we believe that a quarter-mile study
17 area is too small to capture the indirect
18 impacts especially to the north and west. We
19 believe that the scoping area should extend at
20 least to Grand Street and then followed down
21 to Oliver Street and then to the shoreline.

22 We're also aware that within the
23 area, recently the New York City Housing
24 Authority has announced plans to construct
25 additional housing which will be 50 percent

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2 affordable and 50 percent market-rate.

3 The lead agency should determine
4 how the New York City Housing Authority makes
5 their in-fill policy decisions, and if they
6 make any in-fill policy decisions considering
7 the neighborhood's AMI or the neighborhood's
8 build context, the impacts and changes of AMIs
9 and build contexts should be projected into
10 the New York City Housing Authority in-fill
11 policy and any new New York City Housing
12 Authority sites that might be indirectly
13 developed because of the action taken.

14 In addition to completing the
15 Waterfront Revitalization Program Consistency
16 Assessment form, the Draft Environmental
17 Impact Statement should include analysis of
18 how the combined developments would adhere to
19 the 44 policies relevant to the development of
20 the New York State Coastal Management Program.

21 Now I'll move to other scoping
22 additions that should be considered.

23 Socioeconomic conditions, both
24 direct residential displacement: One, if the
25 developer plans to displace residents, we need

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2 more information on relocation costs, indirect
3 residential displacement.

4 The SEQOR Technical Manual, we
5 believe in -- sorry, the CEQR Technical Manual
6 for assessing the direct residential
7 displacement is inadequate because it assumes
8 that rent-protected areas will not have rent
9 increases. We know this to not be true based
10 on our experience within the community, and we
11 ask that the lead agency to consider the
12 following areas of -- in addition that this
13 development will have an adverse impact on
14 residential -- indirect residential
15 displacement that includes not only the
16 census;

17 Current real estate data;

18 Eviction and foreclosure data;

19 Data on landlord harassment;

20 Building operation permits;

21 Demolition permits;

22 Complaints of landlord

23 harassments;

24 Inventory of currently regulated

25 buildings;

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2 And inventory of local requests
3 for counsel and interviews with local housing
4 groups.

5 In addition, we believe there will
6 be indirect business displacement, and these
7 businesses are essential to a population where
8 English is a second language and where they
9 require businesses that facilitate their
10 transactions in order to acquire basic
11 essentials.

12 We also request that the scoping
13 include community facilities and services such
14 as police and fire. The Draft Environmental
15 Impact Statement should examine the adverse
16 impact of gentrification driven over policing
17 will have on existing low-income communities
18 of color, particularly the youth.

19 The Technical Manual states that
20 there's no threshold when evaluating potential
21 significant impacts. We think that in this
22 case the number of units should give rise to
23 an examination of the impacts on our police
24 and fire, especially given the fact that our
25 local precincts and ladder companies don't

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2 usually deal with 1,000-foot buildings.

3 In addition, we should examine
4 schools. Currently the examination is based
5 on a 2000 census PUMS file. That's completely
6 out of date, and there should be a new
7 analysis done using the communities --
8 American Community Survey.

9 The analysis should look only at
10 elementary schools that are close to the
11 proposed project and not all schools in the
12 district as well.

13 We should look at publicly-funded
14 childcare, given that the last assessment of
15 the area did not include Universal Pre-K.

16 We should look at libraries and
17 not the impact on circulation, but on the
18 services that libraries provide to the
19 communities and the impacts on that.

20 Healthcare facilities: Community
21 District 3, in our needs statement, we've
22 stated that we're a federally designated
23 health professional shortage area, and we need
24 primary care, dental care and mental health
25 care. We feel this will also have a huge

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2 impact on those services.

3 The electrical grid: We have no
4 idea what impacts these developments will have
5 on that.

6 And open space, which I'm sure has
7 been talked about at length: Open space
8 analysis should focus solely on
9 publicly-accessible open spaces.

10 Private-owned open spaces are not a mitigating
11 factor. The lead agency should consider
12 making all or some of the private-owned open
13 spaces in the project open and accessible to
14 the public.

15 Considering shadows and shadowing,
16 not just in our public open spaces but
17 including the water and waterfront as well as
18 shadowing over historic and cultural areas.

19 In general, the urban design and
20 visual resources are going to be impacted in a
21 multitude of ways, including whether the
22 building maintains solid street walls, whether
23 they create a sense of place, whether they
24 promote pedestrian use of public space,
25 whether they obstruct local landmarks, whether

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2 they -- whether the designs use a lighting
3 scheme or locally-drawn public art in street
4 furniture that can continue to give the area
5 the strong historic urban character.

6 We would like that the scoping
7 consider transportation, including not just
8 the F train subway station but also the D.
9 And when considering the F train, the
10 maintenance and necessary upgrades to that
11 station; the bus capacity; the recent impacts
12 of Uber and ride sharing, which we believe the
13 residents of this community, with the proposed
14 developments, rather, will rely heavily on;
15 parking, the impact of parking on the
16 community, as well as bikes and the impact on
17 increased bike usage.

18 We're also conscious of the impact
19 that climate change will have in the area, and
20 the DEIS should include an explanation and
21 justification of the future flood zone
22 projections used in the flood elevation
23 worksheet.

24 We'd, in conclusion, like to
25 propose some alternatives to the project. In

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2 addition to the no-action alternative, the
3 DEIS should study the following alternatives:

4 An alternative that examines the
5 project that accounts for all currently
6 approved amendments to the LSRD plan has not
7 yet built;

8 A lesser density/lower scale
9 alternative that adds additional housing and
10 affordable housing above the no-action
11 alternative but which is more in scale with
12 the surrounding neighborhood. The alternative
13 may be modeled after plans in the area
14 produced by the Chinatown Working Group within
15 Subdistrict D;

16 An alternative design that does
17 not add unnecessary or unwarranted height.
18 For example, one of the buildings proposed
19 plans for 15 floors of mechanical space. That
20 is a third of the building's height that has
21 very little value and no benefit to the
22 community;

23 And, finally, the DEIS should
24 study a No Unmitigated Impacts' Alternative.
25 This may result in an alternative plan that's

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2 more like the Chinatown Working Group
3 alternative, but its purpose would be to
4 demonstrate the changes that would have to be
5 taken to eliminate all of the projects
6 unmitigated impacts.

7 While this alternative may not be
8 useful in relation to the project's
9 objectives, it will serve as a tool that
10 demonstrates the magnitude of change to the
11 project that will be necessary to eliminate
12 impacts.

13 I appreciate your time. Thank you
14 very much.

15 (Applause.)

16 MR. DOBRUSKIN: Thank you very
17 much for your comments.

18 Our next speaker is Manhattan
19 Borough President Gale Brewer.

20 MS. BREWER: Thank you very much.
21 I know it's a long day for all of you and for
22 me, but I appreciate the opportunity to be
23 here.

24 I am Gale Brewer, Manhattan
25 Borough President. And just like everyone

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2 here, I'm here to testify in regard to the
3 draft scope of work prepared for the
4 development within the Two Bridges Large Scale
5 Residential Development on the Lower East
6 Side, Community Board 3, Borough of Manhattan.

7 And I want to thank the chair of
8 Board 3 for his excellent testimony.

9 The scope and scale of the
10 cumulative development proposed in this single
11 block, as the direct result of three separate
12 proposals, represents more growth in a
13 36-month period than the neighborhood has seen
14 in 30 years. Three years means an entire term
15 in middle school for a student or the
16 remaining life expectancy of a senior, and I
17 worry such drastic development will not just
18 disturb their quality of life but it could
19 jeopardize health, safety and ability to
20 thrive.

21 You probably know that on June 22,
22 2016, elected officials in the area, including
23 myself, signed a letter asking the Department
24 of City Planning to interpret these proposed
25 developments as major modifications to the Two

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2 Bridges Large Scale Residential Development to
3 require substantive public review under what
4 we call ULURP.

5 DCP instead determined that these
6 three proposals qualified only as minor
7 modifications and they will simply be subject
8 to a courtesy referral to the Community Boards
9 at a later date. We still find this to be
10 unfortunate.

11 However, DCP did determine the
12 necessity of this joint environmental review.
13 DCP required individual developers to complete
14 the joint EIS process, which included four
15 community engagement meetings -- they were
16 lots of fun. Oh, my God.

17 In response, we coordinated the
18 residential tenant leaders into a community
19 task force along with Council Member Chin to
20 work with this development team and help
21 coordinate community priorities and responses.

22 The task force designed the
23 community survey -- this is important -- with
24 several goals, including deepening community
25 understanding of the EIS process -- which is

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2 very hard to understand in any language -- and
3 identify community concerns and priorities.

4 A copy of the survey and the
5 actual results will be submitted to the DCP
6 before June 8th of this year, but I know the
7 community has seen it. Survey questions
8 sought to capture respondents' relationship to
9 the area, level of prior engagement with the
10 development proposals, concerns relating to
11 sections of the environmental review, and
12 issues previously identified as priorities
13 from the community.

14 We received -- and this is really
15 impressive -- over 400 responses in English,
16 Spanish and Chinese from ten different
17 residential developments in the neighborhood
18 including five buildings outside of the exact
19 area.

20 Our staff worked really hard, as
21 did the Council member, to produce accurate
22 translations and administered the surveys
23 during tenant association meetings. We
24 answered lots of technical questions about the
25 EIS process, and we crunched amounts of data

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2 received in all these languages really in just
3 a few weeks.

4 We attended over 30 meetings with
5 residents to accomplish the goals of that
6 survey. We shared the results of that survey
7 effort with the task force members and
8 Community Board 3 Land Use Committee to help
9 shape the testimony, the advocacy, and the
10 ongoing discussions.

11 I will be referencing the survey's
12 results today and will share notable findings
13 with you.

14 320 of the persons who answered,
15 or 76 percent, identified as living in Two
16 Bridges;

17 307 of the persons who answered
18 lived directly within the zone that we're
19 talking about, the large scale;

20 Of the 320 people who answered,
21 74 percent have lived there for over 20 years.

22 The top five priorities:

23 No. 1, affordability of the
24 neighborhood, not surprising;

25 No. 2, they want transportation

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2 improvements;

3 No. 3, they're concerned about the
4 impact of construction;

5 No. 4, they're very concerned
6 about high buildings, tall buildings and the
7 impact on shadows and light;

8 And No. 5, they're worried about
9 the air quality.

10 And there were many others, but
11 those were the top five.

12 I share the concerns identified by
13 the residents who completed the survey, and I
14 really appreciate the time they gave. I hope
15 the DCP will take these results seriously --
16 we'll give you the raw data -- and make them a
17 priority.

18 There are alternatives. I firmly
19 believe that there must be a more commonsense
20 alternative for these out-of-scale towers that
21 would more properly fit into the context of
22 the neighborhood. Rezoning is more
23 contextual. Given the survey responses, this
24 is a shared sentiment with the community.

25 Major reasonable alternatives to

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2 the proposals would include more affordable
3 units at deeper affordability, more public
4 space and lower building heights in bulk more
5 appropriate to the current landscape.

6 Changes to these proposed projects
7 to reflect these concerns would go a long way
8 to assure residents and all of us that the
9 developers are earnestly interested in joining
10 the community and not creating one separate
11 from the current Two Bridges area.

12 A lack of significant
13 affordability and open space plus super-tall,
14 out-of-context buildings will alienate the
15 existing community. These new buildings could
16 lead to indirect and direct displacement in
17 the community. It's even going to be hard to
18 find affordable groceries.

19 We're also wary of whether the
20 DSOW has sufficiently taken into account the
21 many other developments and initiatives
22 occurring around Two Bridges. Let me give you
23 some examples:

24 Lower Manhattan coastal resiliency
25 is taking place;

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2 Extell is building on the Pathmark
3 site two super-tall buildings;

4 Recently, NYCHA announced in-fill
5 projects at LaGuardia Houses;

6 There's work on the Rutgers tube
7 that serves as the F train stop. By the way,
8 that's the only train in the area;

9 And, of course, we have Essex
10 Crossing.

11 None of these projects fall
12 directly within the district or the zone, but
13 they're close, and they have overlapping study
14 areas. There's a lot of construction, a lot
15 of new people, and it will impact -- I think
16 often negatively -- the neighborhood and the
17 current residents.

18 Construction of the Extell
19 project, as a whole, caused residents in
20 adjacent structures hardships. They include
21 cracks in the apartment walls, doors dislodged
22 from frames, shaking ground, lack of street
23 access, filthy water, cracks in the sidewalk,
24 noise, air quality issues.

25 Temporary impacts don't feel

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2 transient when many new buildings are being
3 constructed. And there are other issues. Two
4 Bridges sits on the edge of the Lower East
5 Side reservoir and developments in the area
6 are already experiencing more rats, real
7 infestations.

8 Second, the East Broadway train
9 station is really overcrowded. And although
10 the project considers the impact these three
11 developments might have on it, it must
12 consider the other developments I mentioned
13 plus construction plans for the F train and
14 the tunnel itself.

15 The work required on the Rutgers
16 tube is due to Hurricane Sandy. We know how
17 devastating that was to Two Bridges, and the
18 neighborhoods are still recovering. These
19 projects should go to great lengths to avoid
20 any duplicate efforts while coordinating
21 construction and resiliency within the area.

22 On the other hand, these projects
23 must not pass the buck and assume it is
24 solving every resiliency problem in the area.
25 These developments will have residents. These

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2 residents will have neighbors, and developers
3 should do all they can to ensure that not only
4 the residents of the three buildings are
5 protected from a natural disaster but all of
6 their neighbors.

7 A swelling of the neighborhood
8 population might also put a significant strain
9 on community resources, particularly for those
10 who are vulnerable: children, immigrants,
11 non-English speakers, and seniors. I worry
12 that if the buildings are built, essential
13 neighborhood staples like childcare, support
14 for immigrants, support for seniors, low-cost
15 restaurants, those programs that help
16 non-English speaking families, could lose
17 their place in the community because the rent
18 and the real estate rent will soar.

19 One type of community resource in
20 particular that I believe calls for
21 attenuation under CEQR is capacity of health
22 and senior care facilities in the area, and
23 whether they'll be able to absorb these
24 additions to the population.

25 Everyone needs access to hospitals

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2 and doctors, but particularly seniors. As
3 part of the 2,775 units proposed between these
4 three developments, 200 are pre-reserved for
5 seniors. This is, again, in addition to the
6 developments of Extell, Essex Crossing and
7 LaGuardia.

8 The DSOW states, quote, The
9 ability of healthcare facilities to provide
10 services for a new project usually does not
11 warrant a detailed assessment under CEQR,
12 closed quote.

13 I would argue that this is an
14 exceptional case and ask that this area
15 received a detailed assessment.

16 In conversation with
17 community-based organizations, I've heard
18 concerns about the increase in police presence
19 and activity that usually accompanies a
20 drastic upward change in the average household
21 income of a neighborhood; and their assessment
22 trends typically result in more frequent
23 arrests and summons of the incumbent
24 population for minor infractions, particularly
25 when there's gentrification.

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2 The safety and security of all
3 citizens is a priority. But I have concerns
4 about shifts in socioeconomics of the
5 neighborhood that negatively impact its
6 long-time residents, the majority of whom are
7 non-white and low-income.

8 One such manifestation of this
9 type of issue would be the enforcement of the
10 new developments' private space policies. Let
11 me say that again, private space policies --
12 which I do not like -- and the reason why any
13 open space added as part of any project should
14 be accessible to the public, especially those
15 residents who share that zoning lot.

16 Without the type of substantive
17 conversation we could have had, if the ULURP
18 process existed, on things like AMI and unit
19 breakdown and unit size, it is difficult to
20 state what impacts there might be on the
21 schools. You hear about that from the
22 community board.

23 Experience has shown that
24 short-term construction impacts are not
25 actually short-term. When they encompass the

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2 majority of the school year, a student's quality
3 of life is not a quick-fix when long, overdue
4 facilities upgrades remain unsolved, and then
5 overcrowding will exacerbate everything. The
6 DEIS should disclose all of these impacts.

7 As I've stated, you really need to
8 analyze these three projects, not just
9 together but in the greater context of Two
10 Bridges and the Lower East Side. All of CD 3
11 has been rampant with gentrification for at
12 least a decade. They've seen it.

13 The NYU Furman Center published a
14 report on gentrification in New York and found
15 the Lower East Side, Chinatown to be
16 gentrifying at the third-most drastic pace in
17 our city, with a 50 percent change in average
18 rent that's upward between 1990 and 2014.

19 These three projects are not being
20 proposed in isolation, but it's part of a
21 trend sweeping across the area and must be
22 treated as such. I recognize that the large
23 scale area has a specific boundary, but the
24 domino effect of gentrification that may
25 result in drastic changes to this neighborhood

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2 does not. So given the extraordinary
3 circumstances of this neighborhood seeing
4 massive market-rate buildings enter the area
5 where there are low- and moderate-income
6 residents, I believe that the area analyzed
7 through this scope of work should be expanded
8 beyond the quarter-mile and include Extell,
9 Essex Crossing and the LaGuardia in-fill at
10 the very least.

11 I also believe that the DEIS must
12 address the fact that the current resiliency
13 building to be permanently enacted following
14 Executive Orders post-Sandy does not help
15 existing buildings. If new developments do
16 not take a holistic look at the entire area,
17 existing buildings and the existing population
18 will remain vulnerable to floods and climate
19 events.

20 I ask the DCP look not just at the
21 types of real estate data listed in the DSOW,
22 but also on how the introduction of a block of
23 market-rate units can affect a neighborhood's
24 affordability long-term.

25 Again, like neighborhoods in the

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2 City, these buildings are part of a trend and
3 I don't believe they'll be the last
4 market-rate units to enter the local housing
5 area. I will point DCP to the Furman Center's
6 report.

7 I did not see specific mention of
8 tenant harassment or abuse in the DSOW. This
9 must be examined and another reason why the
10 scope should be expanded to include the
11 surrounding areas, including the
12 privately-owned tenements. As property values
13 increase, so do the incentives for owners to
14 push out rent-regulated tenants. I think we
15 know that only too well.

16 These types of abuses get worse
17 and more prevalent when tenants are part of a
18 of vulnerable population: immigrants, seniors,
19 non-English speakers.

20 I ask that DCP examine data around
21 rent-regulated units, tenant harassment,
22 evictions in the area and work with local CBOs
23 in this effort.

24 I'm also concerned about the
25 safety and health of the seniors at 80 Rutgers

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2 Slip who will be moved as a result of the
3 construction of a building that will
4 cantilever over theirs. It should be a top
5 priority for all of us to see that any
6 relocation plans for the seniors who live in
7 the apartment while it's being built be given
8 how they are going to be relocated and come
9 back, if necessary.

10 That Final EIS should not be
11 approved until all of that is discussed,
12 analyzed and agreed upon. It is unacceptable
13 there would be any ambiguity around the fate
14 of a group of seniors who have been part of
15 this community for decades just because
16 there's a new real estate development. That
17 is wrong.

18 And we talk about transportation.
19 It is discussed everywhere. It's one of the
20 priorities of those who filled out the
21 surveys. Capacity and access of the F train's
22 East Broadway stop is a challenge. In a
23 neighborhood with lot of seniors, it is the
24 only train station for over a half mile in any
25 direction. It is several flights of stairs

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2 below grade. It has cramped and confusing
3 entrances and exits, and it sits on a hill
4 above the Two Bridges neighborhood. It needs
5 elevators. It needs ADA. It needs a
6 corrected internal circulation core. It's so
7 crowded during rush hour residents line up at
8 street-level to get into the station.

9 It's difficult for seniors, for
10 strollers, for disabilities. It's not a
11 question of whether there are elevators needed
12 at the station; it's a question of how many
13 and where. And it needs to be ADA accessible.
14 With an influx of almost 3,000 units for these
15 three projects plus the others in the area,
16 the platform will be bursting at the seams.

17 In March of this year, other local
18 officials and I wrote a letter to the MTA
19 requesting more information on this work. We
20 never got an answer. So I'm requesting the
21 DCP, DOT, DYDT, and all relevant agencies
22 coordinate in advance of any plans being
23 approved.

24 I'm also concerned, of course,
25 about the two MTA bus lines and the same issue

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2 of how they're going to serve residents when
3 so many more are in the neighborhood.

4 Sidewalks are another overlooked
5 aspect of transportation. There's fixtures,
6 potholes, cracked walkways all around the
7 area. Up from Henry and Madison, large
8 sidewalk cracks are not only dangerous to
9 pedestrians, they're access points for rats
10 and can exacerbate rodent issues.

11 NYCHA has answered our letter and
12 it requested a repaving for a portion of the
13 sidewalk, but there's a lot of work still to
14 be done.

15 Parking and deliveries for
16 commercial businesses and construction sites
17 are a great concern as well. Work on the
18 Extell site has crippled the surrounding
19 streets during construction and made sidewalks
20 dangerous for people.

21 I hope there will be a detailed
22 analysis as to how the construction should
23 work, and as all of you know, I have a long
24 history of not supporting weekend and evening
25 work in a residential area when there is

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2 construction. That is not something that a
3 permit should be granted for unless it's a
4 real emergency.

5 So, in closing, I still find the
6 City Planning's determination to interpret
7 these applications as minor modifications
8 disheartening. Determining them to be major
9 modifications, which I believe should be the
10 case, would have subjected them to ULURP.

11 This would have mandated a closer examination
12 of all the issues I've raised today and others
13 that you will hear from the residents, most of
14 which came directly from a survey of the Two
15 Bridges residents' greatest concerns.

16 So I hope that the Department will
17 honor what it was told from Council Member
18 Chin and me at the beginning of the this
19 process, that it understood that these were
20 not just any minor modifications and that
21 these were extraordinary circumstances for
22 this neighborhood. That's how we got the
23 joint EIS process the first time. It's never
24 been done.

25 So the exceptional nature of this

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2 case must remain at the forefront of City
3 Planning's conversations as it finalizes the
4 draft scope of work. These three buildings
5 should not be built in isolation and might not
6 have been if there was a real ULURP process.
7 They are part of a larger sweeping trend
8 across the neighborhood, one that's shifting
9 the community already in place. We mentioned
10 LaGuardia and Essex Crossing and Extell.

11 City Planning must expand its
12 scope beyond the default quarter-mile, default
13 numerical thresholds, and look at the whole
14 picture. That's how the agency will do right
15 by the community.

16 Thank you very much for listening
17 to this.

18 (Applause.)

19 MR. DOBRUSKIN: Thank you very
20 much.

21 Our next speaker is Mauricio
22 Pazmino.

23 We don't allow two people at once.

24 MR. PAZMINO: I'll explain.

25 So good evening, everyone. My

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2 name is Mauricio Pazmino. I'm here
3 representing Assembly member Yuh-Line Niou,
4 and Fendi here is representing State Senator
5 Daniel Squadron, and we're here just to submit
6 joint comments to the board.

7 I just want to let folks know that
8 if you wanted copies of the testimony, just
9 approach Fendi or I, as we are here.

10 Since the development -- since
11 these developments were announced, the Lower
12 East Side community, including Community
13 Board 3 and residents have raised many
14 questions regarding this plan at multiple
15 community meetings on these developments, and
16 residents have voiced their opposition to this
17 plan.

18 We are here because of this and
19 ask the City to limit the CL requirement
20 whenever possible. Once again, I just wanted
21 to let folks know, that Senator Squadron and
22 Yuh-Line Niou will be submitting joint
23 comments, and if you want a copy, just feel
24 free to approach us. And we'll obviously make
25 these comments for the record.

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2 Thank you.

3 MR. DOBRUSKIN: Thank you very
4 much.

5 Are there any other elected
6 officials, Community board representatives or
7 government agencies who wish to speak at this
8 time?

9 (No response.)

10 MR. DOBRUSKIN: I don't have any
11 registered speakers, so we're going to move on
12 then to the second part of the meeting -- I'm
13 sorry -- the third part of the meeting,
14 comments from members of the general public.

15 As we mentioned in the beginning
16 of the meeting, speaking time for members of
17 the public is limited to three minutes. We
18 will indicate when your three minutes are up
19 by ringing a bell. At that time, we ask you
20 to kindly conclude your remarks.

21 Our first speaker will be Grace
22 Mak followed by Christopher -- I believe, it's
23 Marte.

24 Grace Mak? Okay.

25 Christopher Marte, M-A-R-T-E,

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2 followed by Dennis Riddle.

3 MR. MARTE: Hi, everyone. My name
4 is Christopher Marte. I'm a life-long
5 resident of Lower East Side. Currently I live
6 on Canal and Eldridge just off the scope.

7 I believe the reach of the scope
8 is not enough. While there are 2,775 units
9 being added and studied in the Two Bridges
10 area, there's an additional 2,200 units
11 already being constructed just a few blocks
12 away at Essex Street Crossing and One
13 Manhattan Plaza.

14 City Planning has to look beyond
15 lines drawn on a map and examine the extreme
16 overdevelopment that would change the
17 community as a whole. This affects our safety
18 during storms, during our commutes when our
19 streets are more crowded and our train
20 stations are more crowded, and during
21 emergencies.

22 Somehow this influx of 2,775
23 people does not qualify as a sizable new
24 neighborhood, so there's not going to be
25 renewal in policing and Fire Department

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2 capacity. Congested streets already make
3 access to emergency service a critical issue
4 in our neighborhood. What would happen when
5 the same responders now have to serve an
6 additional 2,775 households?

7 When the service that we rely on
8 in life-and-death situations are not being
9 studied, how can we trust that our schools,
10 our public transportation, our quality of
11 life, our contentious displacement are going
12 to be taken into account?

13 The community got together to
14 propose a plan, the Chinatown Working Group
15 Plan, that would have prevented this. Now we
16 must demand that the City, at the very least,
17 prioritize the needs, the concerns, and the
18 lives of the community before it considers
19 drastically altering the fabric of the
20 neighborhood for generations to come.

21 Thank you.

22 (Applause.)

23 MR. DOBRUSKIN: Thank you.

24 Our next speaker is Grace Mak.

25 MS. MAK: Good evening, everyone.

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2 My name is Grace Mak. I'm a
3 resident at 82 Rutgers Slip for 20 years. I
4 am a board member of Two Bridges Tower
5 Residential Association and a board member of
6 TUFF-LES. I'd like to thank the Environmental
7 Assessment Review Division and New York
8 Department of Planning for the opportunity to
9 testify today.

10 I'd also like to thank Manhattan
11 Borough President Gale Brewer and Council
12 Member Margaret Chin who asked for this joint
13 EIS and formed Two Bridges LSRD Task Force,
14 since DCP decided that these developments
15 would not undergo a ULURP.

16 I'd like to voice my concerns for
17 my dear neighbors, the seniors, who have lived
18 next door at 80 Rutgers Slip for almost
19 30 years. Since it was first built in 1987,
20 all these seniors have made 80 Rutgers Slip
21 their permanent, peaceful retirement home.

22 They're peaceful, quiet,
23 comfortable quality of life of these seniors
24 will -- that they have enjoyed all these years
25 will soon be abruptly eradicated and

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2 temporarily displaced because a big-time
3 developer, JDS, wants to build a 79-story,
4 1,080-square-foot tall building cantilevering
5 over their home.

6 One of the seniors at 80 Rutgers,
7 Mr. Jock, strongly opposes this development
8 project and plainly said, They are putting a
9 building on top of my head.

10 This type of proposed development
11 is disheartening, unethical, unjustifiable,
12 and is a dehumanizing treatment towards our
13 most vulnerable senior residents with regard
14 to jeopardizing their housing, health, safety
15 and their quality of life.

16 It is unequitable and shameful to
17 build 495 luxury market-rate units and a
18 measly 165 affordable apartments. Our
19 vulnerable seniors, many with serious
20 conditions and are immobile, deserve to be
21 treated honorably, respectfully and with
22 compassion, and be allowed to live their full
23 term of retirement peacefully in the comfort
24 of their permanent homes.

25 As a community, we intend to

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2 protect and strongly advocate against these
3 developers who want to displace, harass, evict
4 or relocate vulnerable residents, seniors and
5 non-English residents from their home. These
6 developers would stop at nothing in order to
7 make a nice marginal profit by building these
8 super-tall, non-contextual towers in the
9 backyard of our beloved community.

10 There's already a senior housing
11 crisis, and the JDS -- it doesn't make sense
12 to permanently eliminate or vacate 10 to 19
13 viable senior units, while the City should be
14 seeking to develop more reasonable, affordable
15 low-cost housing for seniors.

16 We ask for full disclosure and
17 transparency of the 10 to 19 relocation plans
18 for senior residents at 80 Rutgers Slip,
19 including sub-living costs and what would be
20 worked out for those seniors.

21 The time span that it would be
22 located --

23 (Bell rings.)

24 MS. MAK: Thank you for your time.

25 MR. DOBRUSKIN: Thank you.

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2 Our next speaker is Dennis Riddle,
3 and he'll be followed by Lisa Kaplan.

4 MR. RIDDLE: Good evening.

5 I live by the Manhattan Bridge on
6 Madison Street. Some of my figures are out of
7 date. I've worked out of town, but my wife
8 has been in that apartment for over 40 years.
9 I've been there 18.

10 As far as development, New York
11 City -- the last I knew, sewage from here is
12 being pumped under the East River in Brooklyn
13 to be cleaned, but they don't have a storm
14 sewer; so when it rains, the combined load --
15 the trigger plant can't handle it. I remember
16 reading in the papers don't -- for like four
17 days after it rains. I assume that needs to
18 be developed.

19 Blackouts. I've been through,
20 like, two blackouts here. Apparently the
21 electrical grid is overloaded. Last I knew,
22 it wasn't practical to go over 65 stories.
23 And understandably, the energy required to
24 pump the water and other services, it doesn't
25 look practical. So I question beneath the

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2 buildings.

3 Speaking to a local resident,
4 she's telling me that some of the new tenants
5 in a building by the bridge right now being
6 constructed are coming from different parts of
7 the world. So are these needed for local
8 people?

9 A lot of the points that I had in
10 mind with the infrastructure, the social
11 impacts. They close all the sidewalks at 8:00
12 in our neighborhood. All businesses on the
13 first floor, second floor up, we go to bed at
14 night. Most of the buildings are all six
15 stories for the past many years. So there are
16 really shadows. The car traffic is
17 interfering with public transportation,
18 actually challenging them physically on narrow
19 streets.

20 So there's a lot of -- it's
21 like -- it's been already said. It's very
22 fast bringing a lot of people at once and the
23 present problems we have haven't been solved
24 yet.

25 Thank you.

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2 MR. DOBRUSKIN: Thank you.

3 Our next speaker is Lisa Kaplan,
4 followed by Melanie Wang.

5 MS. KAPLAN: Good evening. My
6 name is Lisa Kaplan, and I've been involved in
7 affordable housing advocacy on the Lower East
8 Side for over 40 years.

9 I remember when I was involved in
10 a community-based organization that had some
11 involvement in the planning and reno of the
12 original Two Bridges urban renewal area.

13 I've recently made an effort to
14 read the entire scoping document and the major
15 takeaway that just can't be missed is the
16 absurd premise that this is a minor change to
17 the large scale plan. If this is a minor
18 change, I challenge City Planning to explain
19 to me what it would take to make a major
20 change.

21 What we're seeing here is
22 buildings that are built at an FAR currently
23 of approximately 4 going to an FAR of 12.
24 They're doubling in height and they're being
25 placed on relatively small lots -- several

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2 small lots.

3 And I challenge you -- I wonder if
4 any of you sitting at this table have walked
5 around that neighborhood -- to just envision
6 how 3,000 units, approximately, of housing
7 could ever fit in between the existing
8 buildings on that lot -- on those lots.

9 It's -- I did it recently, even
10 though I know the neighborhood well, and you
11 just can't get your brain around it. I hope
12 you will take the time to walk around.

13 From a visceral point of view,
14 it's impossible to reach the conclusion that
15 this will not change the neighborhood
16 character. It's impossible not to see how it
17 will.

18 Yet the way the scoping document
19 talks about how it's going to look at this
20 question in a very small, one-quarter mile
21 radius and only looking at unregulated
22 apartments, ignoring the effect that it's
23 going to have on rent-stabilized and even
24 public housing units where there's currently a
25 plan to build market-rate units on public

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2 housing property in an adjacent building
3 development is outrageous, and it's a basic
4 flaw in the way that the CEQR document, the
5 technical document, describes the process.

6 So something has to be done to
7 look at the process of neighborhood character
8 in a more -- in a way that's really going to
9 get to the displacement that we're going to
10 see for this project to go through.

11 (Bell rings.)

12 MS. KAPLAN: Oh, my God. I'm only
13 halfway through.

14 MR. DOBRUSKIN: One concluding
15 sentence.

16 MS. KAPLAN: The other point I
17 want to make very strongly is with regard
18 to -- the purpose that's defined in the scope,
19 with regard to the purpose being the mere
20 development of 694 low -- I'm sorry, not even
21 low-income units -- affordable units which we
22 don't know what that means.

23 They have to be affordable to the
24 neighborhood, residents in this neighborhood,
25 and 25 percent is a miniscule percentage of

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2 what's needed for this displacement -- the
3 inevitable displacement.

4 Thank you.

5 MR. DOBRUSKIN: Thank you.

6 Our next speaker is Melanie Wang,
7 to be followed by Zheng Zhi Qing.

8 MS. WANG: Good evening. My name
9 is Melanie Wang, and I'm one of the Chinatown
10 Tenant Union organizers at CAAAV. Our office
11 is at 55 Hester Street.

12 And the Chinatown Tenant Union is
13 a program at CAAAV. Our mission is to
14 organize rent-regulated residents of Chinatown
15 in order to fight gentrification, including
16 harassment and negligence that is standard
17 practice amongst landlords in our
18 neighborhood.

19 The organization has been around
20 for over a decade and we're a membership-based
21 organization. The first thing I like to say
22 is that we at Chinatown Tenant Union stand in
23 solidarity with the residents of the LSRD on
24 all the requests they're going to make of you
25 today concerning the draft scope of work.

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2 But I'd like to talk specifically
3 about indirect residential displacement, which
4 is the focus of our work. The proposed
5 buildings are in close proximity to Chinatown,
6 and residents are deeply concerned over the
7 increased pressure it will surely bring this
8 working-class, immigrant neighborhood.

9 According to the draft scope of
10 work, indirect residential displacement can
11 occur if a project introduces a trend or
12 accelerated trend of changing socioeconomic
13 conditions that leads to increased residential
14 rents, which may in turn displace a whole
15 population to the extent that the
16 socioeconomic character of the neighborhood
17 would change. However, the rent data to be
18 included in this assessment is limited to
19 current market-rate rents.

20 I would like to state plainly and
21 clearly today, that it is by no means only
22 those who pay market-rate rents who face
23 indirect residential displacement, nor are
24 rising rents the only tool that landlords use
25 to force tenants out. Rent-regulated

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2 Chinatown tenants may have certain
3 protections, but they face powerful indirect
4 residential displacement pressures.

5 These include harassment,
6 construction building negligence and repairs
7 negligence amongst many others. Landlords
8 harass tenants and take buyouts. There are
9 also less direct tactics, such as
10 construction-based harassment.

11 Just this past week I visited a
12 tenant's apartment in which half the living
13 room ceiling had collapsed while she stood
14 under it due to the gut renovation of her
15 upstairs neighbor's apartment who had recently
16 been evicted after living there for 22 years
17 by the new predatory landlords who bought
18 their building a year ago.

19 Our organization has seen
20 landlords jack up the rent-regulated rents
21 both legally and illegally. In one building
22 that I work in, rent-regulated tenants have
23 seen a \$105 per unit, per month rent increase.
24 That might be spare change to a landlord, but
25 it's crucial money to working-class families

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2 with children to support.

3 Our organization plans to submit
4 further written testimony detailing specific
5 cases of rent-regulated buildings we've worked
6 in over the past ten years. For now I'll say
7 that rent-regulated tenants are absolutely by
8 no means immune to socioeconomic changes in
9 the neighborhood.

10 Our recommendations for changing
11 the scope of work, as such, are that the study
12 area be increased from .25 to .5 miles at
13 least in order to include a great portion of
14 Chinatown; to add data to the study, including
15 eviction data for the past five years,
16 building alteration permits, complaints of
17 tenant harassment, inventory of rent-regulated
18 stock that's due to expire, and local requests
19 for rights to counsel and interviews with
20 local community groups such as ours.

21 (Bell rings.)

22 MS. WANG: I have two more
23 changes.

24 That you look beyond income to
25 race, education and language capacity to more

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2 accurately identify vulnerable populations,
3 and that you consider the direct feedback with
4 respect to indirect business displacement and
5 indirect residential displacement because loss
6 of services and jobs will create further
7 indirect residential displacement.

8 Thank you.

9 MR. DOBRUSKIN: Thank you very
10 much.

11 The next speaker is Zheng Zhi
12 Qing. The next speaker after this speaker
13 will be Cathy Dang.

14 Because you're speaking through an
15 interpreter, you'll be given five minutes.

16 MS. ZHI QING (through
17 interpreter): Good evening. My name is
18 Zheng, Z-H-E-N-G. I'm a Mandarin speaker and
19 I'm a member of CAAAV. I live on 61 Delancey
20 Street, and I've been living in this
21 neighborhood for more than 30 years.

22 From what I heard about the
23 development, this neighborhood and Chinatown
24 also will face tremendous pressure as a
25 result. The area that we building three

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2 projects is in East River and it's pretty
3 close to Chinatown, and even if there's no
4 direct impact there will be indirect impact.

5 We'll be facing eviction, and
6 Chinatown has already gentrification problem,
7 and many of the tenants' rent-stabilized units
8 are facing evictions.

9 So even before it's proposed
10 project, those of us who lived in Lower East
11 Side/Chinatown area are facing the stress from
12 landlords of evictions. That's why we're
13 organizing together to fight this kind of
14 eviction. But even with that effort we --
15 most of buildings are left with only half of
16 the tenants from before. A lot of them have
17 been forced out.

18 So I understand that you are not
19 even considering the tenants in
20 rent-stabilized housing. You're paying
21 attention to middle-income people, but the
22 fact that you are neglecting tenants like us
23 is really disconcerting.

24 (Bell rings.)

25 MS. ZHI QING (through

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2 interpreter): So we're fighting issues
3 against the landlords for forcing us out, and
4 in my opinion this developments are no
5 different from the landlords who are pushing
6 us out.

7 MR. DOBRUSKIN: Thank you very
8 much for your comments. If you have
9 additional testimony, you can submit it in
10 writing.

11 Our next speaker is Cathy Dang
12 followed by Jessie -- I believe, it's Ngok.

13 MS. DANG: Hi. Good evening. My
14 name is Cathy Dang. I'm executive director of
15 CAAAV organizing communities. Project
16 Chinatown Tenant Union has been organizing in
17 Chinatown for the past 15 years.

18 The stories that were mentioned
19 earlier, can you imagine where you're working
20 with tenants at nine in the morning who are
21 fighting these MCI's, where the money actually
22 doesn't mean that much to the landlords, but
23 they're just trying to drive them out? It's
24 50 bucks for them, but it's actually -- for
25 the tenant, that's a lot of money.

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2 That same landlord where the
3 ceiling collapsed, that same landlord is where
4 a tenant came to us crying because her
5 children have no place to sleep because the
6 rats have ripped out the floors. That is a
7 building within a quarter to half mile of the
8 waterfront.

9 We are an organization who
10 organize tenants to respond after Hurricane
11 Sandy along with GOLES, and we know what
12 flooding has done to the Lower East Side and
13 Chinatown. And we want to make sure that this
14 study does consider the impacts and
15 implications of rent-regulated tenants, not
16 just in Lower East Side but for the Chinatown
17 area.

18 We, of course, prioritize and
19 stand in solidarity with the Lower East Side
20 because this is a Lower East Side issue, but
21 this also means an impact to Chinatown.

22 One thing we want to point out is
23 the cultural and residential displacement.
24 It's one thing that residents and the small
25 businesses will be pushed out, but the other

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2 pieces of cultural significance in Chinatown.
3 And especially to us, what Chinatown means for
4 us locally and nationally, for families who
5 come here on the weekends to build with other
6 families who live in the neighborhood, and
7 what that means for cultural displacement in
8 the neighborhood.

9 We also have a plan called a
10 Chinatown Working Group Plan. And in that
11 plan there's outlined a demand for height path
12 of 350 feet on the waterfront and at least
13 55 percent affordability on the waterfront.
14 We already have a plan that took us so many
15 years to build and that needs to be
16 considered.

17 The last thing I'll say is the EIS
18 doesn't consider the national landscape right
19 now. Our tenants that we work with are under
20 scrutiny for the potential loss of social
21 safety nets of health care, of Section 8
22 vouchers, of fears of being deported. There's
23 so many significant pressures on them right
24 now that their humanity and health and
25 preservation of the neighborhood matters so

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2 much more than these luxury developments.

3 Thank you.

4 MR. DOBRUSKIN: Thank you.

5 The next speaker is Jessie Ngok.

6 MR. NGOK: Hi. Good evening. My
7 name is Jessie. I'm a land-use organizer at
8 Good Old Lower East Side, GOLES.

9 GOLES is part of the task force
10 that has been working with Lower East Side and
11 local residents and LSRD residents during this
12 process. It's essential that these
13 recommendations are implemented along with all
14 other resident recommendations in order to
15 center the needs of existent residents, yeah.

16 The following recommendations are
17 brief points of more detailed comments that
18 will be submitted at a later date, and we also
19 support the CB 3 testimony and task force
20 testimony.

21 With regards to land use, zoning
22 public policy, we believe that the site area
23 needs to be extended to at least half-a-mile
24 radius with an irregular study area to include
25 portions of the neighborhood most likely to be

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2 impacted, as well as adjacent areas extending
3 north to Delancey Street.

4 The EIS needs to include the NYCHA
5 Next Generation, the 48 housing proposed
6 development and Essex Crossing development,
7 and a cumulative impact of the proposed
8 projects and how these increased densities
9 will affect the stress on your
10 infrastructures.

11 In terms of indirect displacement,
12 the study area should also be expanded to at
13 least a half-a-mile radius, and it needs to
14 include the census track of predominantly
15 Latino and Asian communities in the area.

16 In order to accurately talk about
17 the secondary displacement in the EIS,
18 rent-stabilized units need to be included as
19 well as impacts of local residents who are
20 losing preferential rents in subsidized
21 housing, and their ability to find
22 equivalent-priced housing in the facility. It
23 cannot be assumed that only market-rate
24 residents are in danger of displacement in New
25 York City today.

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2 Also, the final scope of work
3 should study how a high number of high-income
4 residents into the neighborhood will increase
5 broken window policing and criminalization in
6 existing low-income communities.

7 And the EIS needs to draw
8 relationships -- draw connections between the
9 relationships of residential displacement as
10 well as business displacement because local
11 businesses that provide essential goods to
12 residents will also contribute to neighborhood
13 affordability.

14 For alternatives, the CWG plan
15 needs to be considered as an alternative,
16 especially Subdistrict D where there are
17 height caps at 350 feet, a requirement of
18 50 percent permanently affordable housing, and
19 much more.

20 Lastly, DCP needs to clarify their
21 determination for minor modification, since
22 the LSRD plan does set back some of the floor
23 areas, lot areas, heights and other
24 requirements. The LSRD was created for low-,
25 moderate-, and middle-income housing for the

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2 Two Bridges area. These proposed projects
3 violate the intentions of the LSRD and the
4 character of this neighborhood.

5 Thank you.

6 MR. DOBRUSKIN: Thank you.

7 The next speaker is Trevor
8 Holland, and he'll be followed by David Tieu.

9 MR. HOLLAND: Good evening. My
10 name is Trevor Holland. I'm president of the
11 Two Bridges Tower Resident Association at 82
12 Rutgers Slip. I'm also part of GOLES and a
13 member of a variety of other civic community
14 organizations.

15 I want to thank the Environmental
16 Assessment and Review Division of the New York
17 City Department of City Planning for the
18 opportunity to speak on the Two Bridges Draft
19 EIS. However, this is not proper City
20 Planning.

21 First, I want to echo in support
22 for many of the comments made from my Two
23 Bridges neighbors, Community Board 3 and our
24 elected official, GOLES, and the team of
25 experts from the City and Regional Planning

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2 Program at Pratt Institute for graciously
3 providing pro bono technical support for our
4 local residents.

5 I have several points I would like
6 to emphasize from my more detailed written
7 testimony that I will provide at a later time.
8 I want to ask all of the City Planning
9 employees here, have you actually seen this
10 area? They are going to shove 4,200 units
11 within a two-block area. The proposed units
12 are, total, more than Hudson Yards and are
13 more than four times the amount of Essex
14 Crossing.

15 The EIS must look at this as a new
16 neighborhood and include all qualifiers,
17 including Rutgers housing, LaGuardia, and the
18 historical history in South Street. The EIS
19 must also look at the remaining local air
20 rights which surprisingly still total quite a
21 bit.

22 All the buildings in the Two
23 Bridges LSRD were developed as affordable
24 apartments. Every single one. The EIS must
25 call for a full description and a rationale as

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2 to why the original intent of providing low-,
3 moderate-, and middle-income housing is not
4 being acted on. All of the proposed buildings
5 either go on top of, cantilever over or go
6 directly next to existing buildings, many of
7 them eliminating windows, light, air and
8 space.

9 All of you New York City planners,
10 you want to tell me that with all your
11 expertise that you actually endorse these
12 designs? The draft scope needs to examine the
13 effects of current buildings -- this effect on
14 the current buildings.

15 The draft scope also needs to take
16 into account the continued construction of the
17 waterfront projects, the Lower Manhattan
18 Coastal Resiliency Project, the East Side
19 Coastal Resiliency Project, and all this is
20 happening within the span of a few blocks.
21 All of them have similar end dates.

22 The senior building of 80 Rutgers,
23 earlier we heard testimony on Cherry. City
24 Planning, Department of Buildings or whoever
25 needs to figure out that particular situation

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2 before we continue with this EIS, otherwise
3 what are we reviewing?

4 Additionally, the EIS needs to
5 look at senior displacement and answer the
6 question of: What happens when a 90-year-old
7 senior says, No, you're not going to evict me
8 from my home?

9 The draft scope should also
10 address our skyline. This is our skyline.
11 Many of you have already seen from different
12 places the --

13 (Bell rings.)

14 MR. HOLLAND: -- on the Manhattan
15 Bridge.

16 I just have one more.

17 MR. DOBRUSKIN: One sentence,
18 please.

19 MR. HOLLAND: With regard to
20 secondary displacement, the building I live
21 in, 82 Rutgers, there were 135 evictions out
22 of 198 units over a two-year period. The
23 Draft EIS scope must expand to look at
24 secondary displacement of rent-stabilized.

25 Thank you.

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2 (Applause.)

3 MR. DOBRUSKIN: Thank you.

4 The next speaker is David Tieu to
5 be followed by Pamela Thomas.

6 MR. TIEU: Hi, my name is David
7 Tieu. Tonight I'm speaking as a member of
8 LESON, Lower East Side Organized
9 Neighborhoods, and the Chinese Staff and
10 Workers' Association. I'm here to actually
11 submit written comments on the draft scope of
12 work.

13 We find that the draft scope of
14 work is severely deficient in several areas.

15 One, the mixed-tower group
16 requires special permits, special permit
17 modifications and authorizations under New
18 York City Zoning Resolution, Article 7,
19 Chapter 8: To Build an LSRD.

20 Redistribution of bulk and open
21 space increases to the maximum developed floor
22 area and lot coverage, whole-scale
23 restrictions on light and air and total
24 operation of the neighborhood character must
25 be separately studied on applicable provision

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2 of the zoning resolution.

3 Furthermore, the Zoning Resolution
4 78-313 requires that DCP issue permanent
5 findings that may require authorizations of
6 special permits under Zoning Resolution 78-311
7 or 78-312, won't interfere with neighborhood
8 character, restrict air and light access and
9 privacy, introduce building in bulk and create
10 traffic congestion.

11 The draft scope of work must
12 assess a systemic overload of the
13 infrastructure pumping full flow permit and
14 discharge capacities of the entire Newtown
15 Creek drainage basin from 14th Street on the
16 West Side to 71st Street on the East Side.

17 Possible interference with
18 achieving compliance with administrative
19 orders issued to the City of New York for
20 violation of federal and state water pollution
21 laws, and interference with the care of water
22 from Newtown Creek pursuant to the federal
23 Clean Water Act from constructing and
24 operating the pre-proposed towers in the LSRD.

25 As far as valid alternatives are

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2 concerned, pass the Chinatown Working Group
3 plan. There's no reason why it can't be
4 passed tomorrow.

5 And next point, involved in
6 interested agencies. Require a quality review
7 as part of the EIS to involve interested
8 agencies. The following agencies must be
9 involved in the DCP evaluation of the impacts
10 of this and related projects:

11 Department of Housing and Urban
12 Development regarding funding issues, the U.S.
13 EPA regarding legal compliance under the Clean
14 Water Act, the State Department of Parks and
15 Conservation regarding legal compliance
16 requirement with the Clean Water Act, and FEMA
17 regarding flood plain construction issues.

18 And the DSOW goes over the seven
19 cumulative impacts called actions, especially
20 those created by multiple larger scale
21 developments in Lower Manhattan.

22 So that pretty much sums it up. I
23 have the written comments here.

24 MR. DOBRUSKIN: We'll take them.

25 Thank you.

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2 (Applause.)

3 MR. DOBRUSKIN: The next speaker
4 is Pamela Thomas, followed by Richard Yuen.

5 MS. THOMAS: My name is Pamela
6 Thomas, and I am a resident of 82 Rutgers
7 Slip, and I have lived in the neighborhood for
8 20 years. I would like to briefly talk about
9 affordability of the proposed high-rise
10 residential developments.

11 Developers and consumers have a
12 different perception about the word
13 "affordable." I looked up some salaries --
14 salary scales, and I looked up an executive
15 makes \$100,000 to \$125,000. I looked up
16 experienced managers, \$70,000, \$80,000.
17 Managers, \$60,000 to \$150,000. And then you
18 have the entry-level people, which is 25,000
19 to 40,000.

20 I feel like affordable housing
21 isn't being put as a main priority in the new
22 high-rise project, and I also feel like it's
23 being overshadowed. I would like for you to
24 take all salaries and pay scales into
25 consideration when you use the words

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2 "affordable housing."

3 I would like for the EIS to take
4 into greater consideration those of the middle
5 class who work just as hard as the ones who
6 will be residing in the new high-rise
7 developments.

8 Thank you.

9 (Applause.)

10 MR. DOBRUSKIN: Thank you.

11 Next speaker is Richard Yuen,
12 followed by Joel Kupterman.

13 MR. YUEN: Hello. My name is
14 Richard Yuen. I was brought up in the LSRD
15 area. I live outside of it now, but I still
16 have family and friends there, so this greatly
17 affects them.

18 The main thing I want to bring up
19 today is that coming from a person that
20 doesn't know this process, this process seems
21 to be very rushed and not really transparent.
22 This is before the EIS, right? We are told
23 that pretty much this is as-of-right and that
24 the buildings would be brought up.

25 And luckily we have the Lower East

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2 Side Organized Neighbors and their attorney
3 that discovered that there are regulations
4 that they had to follow, which they haven't.
5 Right?

6 So I'm pretty much representing
7 people that have -- hoping to represent people
8 that have lost faith in the process. And then
9 they don't believe in the system; they're
10 relegated to take concessions. But I'm hoping
11 you guys will put a full effort into the
12 comments that were brought up by Lower East
13 Side Organized Neighbors.

14 And, in addition, things just
15 don't make sense under the developer site.
16 They mention some things they are not going to
17 look into in the DEIS. Specifically, they
18 talk about this does not pertain to any other
19 projects: the potential effect of NYCHA
20 resources, solid waste, sanitation services,
21 specific industries. And there's no real
22 logic to it.

23 If you look at those topics,
24 right, those topics should be examined in the
25 EIS. So please take a more thorough look.

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2 Please involve the agencies that are needed,
3 like the Environmental Protection Agency and
4 everyone else so that people that are in the
5 neighborhood, in the LSRD, are properly
6 treated.

7 Thank you.

8 (Applause.)

9 MR. DOBRUSKIN: Thank you.

10 Joel Kupterman.

11 (No response.)

12 MR. DOBRUSKIN: Nancy Aroyon
13 followed by Tracy Mobley.

14 MS. AROYON: My name is Nancy
15 Aroyon, and I would just like to thank you for
16 giving me this opportunity to address my
17 concerns.

18 I have resided at 286 South Street
19 for about 30 years. I have seen a lot of
20 changes around my community, and one of those
21 changes were like 9/11, Sandy, and now the
22 bike lanes and so on. But nothing to the
23 scale of such magnitude; the major
24 construction of so many high towers within
25 three blocks.

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2 Construction activity is a main
3 source of pollution, and one of them is air
4 pollution. I am concerned with air pollution
5 because after 9/11, I -- ten years later I
6 developed asthma, and when I get asthma, I get
7 sick for weeks and I always have to be
8 hospitalized.

9 So construction activity is a
10 major source of pollution. And one of them is
11 air pollution. Air pollution is a major
12 threat to the public health, especially when
13 major construction of such magnitude is coming
14 to our neighborhood for more than three years.

15 The process of land clearing and
16 the operations of diesel engines as well as
17 demolition would release materials. Working
18 with -- workers working with substances and
19 high-level dust from concrete, cement and wood
20 will pollute our quality of air.

21 We need a specific measure to be
22 taken to mitigate this risk. Dust must be
23 controlled because it's a significant risk
24 factor for a number of health conditions, like
25 asthma, difficulty breathing, wheezing,

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2 coughing, respiratory, cardiac condition,
3 stroke and lung cancer. To have a quality for
4 air we need from the construction site to
5 implement dust prevention.

6 Additionally, there are other
7 concerns not related to the public health but
8 which are equally important. The impact of
9 such a high population of people inhabiting
10 such a concentrated space brings forth issues
11 of New York City's aging public
12 infrastructure. Being unable to handle such
13 an influx of people, local transportation is
14 already overprescribed; parking and street
15 traffic, schools are already full.

16 Please take notice that this
17 area --

18 (Bell rings.)

19 MS. AROYON: One minute.

20 This area has traditionally been a
21 neighborhood for lower-income New Yorkers.
22 The higher-income residents will drive lower
23 commodity and retail prices of work making
24 essential goods unaffordable to the current
25 residents.

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2 Thank you.

3 MR. DOBRUSKIN: Thank you.

4 (Applause.)

5 MR. DOBRUSKIN: The next speaker
6 is Tracy Mobley followed by Ceci Pinada.

7 MS. MOBLEY: Hello. My name is
8 Tracy Mobley. I live on the Lower East Side.
9 I've been there 29 years.

10 This is a disgrace to our
11 neighborhood. I mean, you move -- like, the
12 rich is moving in, trying to drive us out.
13 I'm a senior citizen. I may not look it, but
14 I am.

15 (Laughter.)

16 MS MOBLEY: Thank you.

17 It's not fair to us. Just like
18 the lady said before me, I also have asthma.
19 And with all these people moving into the
20 area, it's overpopulated, it's not good for
21 the environment. It's bad enough this is --
22 it's just an island, and you're building all
23 these skyscrapers on this island. It's not
24 good.

25 I'm kind of nervous because I'm

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2 not used to speaking in front of a lot of
3 people.

4 (Applause.)

5 MS. MOBLEY: Also the
6 transportation. It's bad enough I have to
7 walk up all those steps. It's bad enough you
8 took our Pathmark away.

9 I live right in front of that
10 Extell building, the one that's really high.
11 Every day I look out the window. I see these
12 people working in this building. They took my
13 view away, okay? That's bad enough. They
14 took my Pathmark away. It's bad enough I have
15 to go to Brooklyn to go shopping.

16 I'm speaking on behalf of all
17 seniors and all nationalities that live in my
18 area, okay, because it's not fair to us. It's
19 not fair to us at all that these rich people
20 are moving into this area.

21 You call this affordable housing?
22 It's not affordable housing. No, not at all.
23 That's not.

24 Well, that's all I have to say
25 right now. Goodbye.

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2 MR. DOBRUSKIN: Thank you.

3 (Applause.)

4 MR. DOBRUSKIN: The next speaker
5 is Ceci Pinada followed by Christina Zhang.

6 MS. PINADA: Hi. My name is Ceci
7 Pinada. I'm the resiliency training and
8 policy coordinator at the Good Old Lower East
9 Side. We're also one of the executive members
10 of LES Ready, Disaster Response Coalition
11 based on the Lower East Side, and members of
12 the Energy Democracy Alliance.

13 My comments reflect resiliency
14 concerns of the scope. One of them is that in
15 the shadows assessment you should also include
16 an impact of the sun loss potential for future
17 solar developments for buildings in the area.
18 As those -- that could limit increased
19 resiliency in the future.

20 In addition, in the study of the
21 potential for extreme winds, this should be
22 based on the latest climate science and look
23 at how increased -- the increased wind
24 potentials that are outlined by the New York
25 City Panel on Climate Change.

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2 While we're happy that the
3 analysis includes the greenhouse gas emissions
4 that will be generated by the development of
5 these projects, it still doesn't answer the
6 question of what level of added emissions is
7 too much? Many would say that we're already
8 past our limit.

9 And, in addition, in evaluating
10 the flood zone, as other residents have said,
11 the scope currently only looks at how the
12 flood zone will impact those buildings and
13 that they're ability to cope with floods, but
14 it doesn't look at the study area or the
15 increased stress on the existing residents
16 there or the further scoping instructive that
17 are imposed on existing shelters, giving more
18 residents an increased stress on local
19 resources, on transportation in the case of an
20 evacuation, and the increase of energy stress
21 on the grid.

22 And we -- when it comes to the
23 energy assessment, we challenge the idea that
24 a detailed assessment of the buildings energy
25 impact is not necessary, regardless of whether

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2 or not the project would consider to generate
3 substantial new consumption of energy, the
4 entire area below Delancey Street is
5 underserved by the existing utility grid.
6 This is proven by the very often brownouts
7 that happen during peak summer demand.

8 So we want to know -- and an
9 energy professional from Beyond the Grid
10 originally guessed that it might have
11 connection loss during peak load, maybe more.
12 So certainly the electric infrastructure needs
13 major upgrades to deliver services to these
14 new buildings.

15 And we also like just to -- that
16 to do an assessment of the potential brownouts
17 and blackouts that might happen in the area
18 and take into account how the increased
19 frequency and intensity in extreme weather
20 events, such as heat stress, might contribute
21 to the higher emissions scenarios.

22 We're happy to see that they
23 include indirect residential displacement;
24 however, this also falls short of how that
25 impacts community resiliency in the sense that

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2 when you increase prices and when you displace
3 residents, you very severally impact overall
4 community resiliency.

5 Following Hurricane Sandy, the
6 strong existing social network of the Lower
7 East Side was hailed as one the main reasons
8 that this neighborhood was able to support
9 each other, recover and minimize --

10 (Bell rings.)

11 MS. PINADA: One more thing.

12 And so we also want you to look at
13 indirect business displacement, too, and how
14 not providing the potential loss of affordable
15 basic needs also impacts overall community
16 resiliency.

17 MR. DOBRUSKIN: Thank you.

18 (Applause.)

19 MR. DOBRUSKIN: The next speaker
20 is Christina Zhang followed by Chen Yo.

21 MS. ZHANG: My name is Christina
22 Zhang. I'm a resident of the Village. It's
23 not within the LSRD area but just outside it.
24 I've lived in the neighborhood for about
25 22 years now. I grew up there.

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2 And I just don't understand how
3 you guys are letting these developments come
4 into the area. They're just out of context.
5 This neighborhood is -- well, currently,
6 affordable. They might have -- the new
7 developments might have 75 percent affordable
8 housing, but that's not going to mitigate the
9 effects of the incoming luxury buildings.

10 So what I'm really afraid of and
11 what a lot of people who live in the area are
12 afraid of is displacement, not -- you know,
13 secondary displacement.

14 Sorry, I'm nervous.

15 So another thing I want to address
16 is like the affects of construction. The
17 Extell Tower, they damaged the building next
18 door, 82 Rutgers Slip. I heard there were
19 cracks in the buildings, some people can't
20 open or close their windows. I have found the
21 complicity of LSRD -- I'm just worrying about
22 the effects of construction on their
23 buildings.

24 And as a lot of people said, they
25 have asthma. Like, what are other health

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2 affects that will come out of this?

3 And then, lastly, I just want to
4 address the transportation issues. The
5 F train -- the MTA announced that they will
6 close the F train tunnel in 2021, and that
7 would coincide with the influx of these new
8 residents. And I think the study needs to
9 examine the impacts of that and propose
10 alternate modes of transport during that time
11 of closure.

12 Thank you.

13 (Applause.)

14 MR. DOBRUSKIN: Thank you.

15 Our next speaker is Chen Yo.

16 MR. YO: Hi. Department of City
17 Planning. Thank you for letting me speak.

18 I think the one thing you all need
19 to be studying is how these three buildings
20 will impact the rent-regulated,
21 rent-stabilized tenants living in the area,
22 and that's the one thing that you're not
23 doing.

24 Also, there needs to be a better
25 way to calculate the average median income.

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2 You don't take the average from Westchester
3 County and Long Island to calculate the income
4 of people living in the Lower East Side. It
5 doesn't make sense to me.

6 Also, we have the Chinatown
7 Working Group plan, which was compiled from
8 the community on what's best for the
9 community. So, you know, you have all this in
10 front of you, but whether or not you choose to
11 do something with it and listen to it, I guess
12 is up to you. But as government
13 representatives of the people, you need to
14 speak up and represent the people and not just
15 for money.

16 So thank you.

17 (Applause.)

18 MR. DOBRUSKIN: Thank you.

19 Is there anyone else who wishes to
20 speak tonight?

21 (No response.)

22 MR. DOBRUSKIN: If not, let me
23 remind everyone that we're going to keep the
24 written comment period open until the close of
25 business on June 8th, and we do encourage you

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2 to submit your written comments.

3 I'd also like to thank everyone
4 for taking the time to come out today, and we
5 really appreciate the thought that everyone
6 put into their comments.

7 The meeting is now closed. Good
8 night.

9 (Time noted: 7:51 p.m.)

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C E R T I F I C A T E

STATE OF NEW YORK)
 : ss.:
COUNTY OF QUEENS)

I, NICOLE ELLIS, a Notary Public for and within the State of New York, do hereby certify:

I reported the proceedings in the within-entitled matter, and that the within transcript is a true record of such proceedings.

I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 5th day of May 2017.



NICOLE ELLIS

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APPENDIX C
LSRD Approvals

A. SUMMARY OF PREVIOUSLY GRANTED LSRD CERTIFICATIONS, AUTHORIZATIONS & SPECIAL PERMITS

PARCEL 7 (STAGE I) AUTHORIZATION—CP 21885

1. Sec. 78-311(a) to permit the distribution of zoning rooms without regard for zoning lot lines and district boundary lines as required by Sec. 23-223.
2. Sec. 78-311(d) to permit the location of buildings without regard for yard regulations as required by Sec. 23- 47 and 23-53.
3. Section 78-311(e) to permit the location of buildings without regard for height and setback regulations on the interior of the project as required by Sec. 23-632 and 23-64.

PARCEL 7 (STAGE I) SPECIAL PERMIT—CP21885

4. Sec. 78-312(d) to permit the locations of buildings without regard for height and setback regulations, on the periphery of the project as required by Sec. 23-632 and 23-64.

PARCEL 6A (STAGE II) AUTHORIZATION—CP21885

5. Sec. 78-311(d) to permit the location of buildings without regard for yard regulations as required by Sec. 23- 47 and 23-53.

PARCEL 5 (STAGE ILL) SPECIAL PERMITS—C 760143 ZLM

6. Sec. 78-312(d) to authorize minor variations in the front height and setback regulations on the periphery of the development.
7. Sec. 78-312(f) to permit modification of the minimum spacing requirements consistent with the intent of the provisions of Sec. 23-71 (Minimum distance between buildings on a single zoning lot) and to authorize modification of the spacing required by Sec. 78-311(d) (for distance between east building on Parcel 5 and building on Parcel 6A).

PARCEL 6B (STAGE IV) AUTHORIZATIONS—N 830316 ZAM

8. Sec. 78-311(d) to authorize the location of the west building without regard for yard regulations which would otherwise apply along portions of the rear lot line wholly within the development.
9. Sec. 78-311(h) to modify the minimum spacing requirements between the west building on Parcel 6B and the building on Parcel 6A.

PARCEL 4A (STAGE V) AUTHORIZATIONS—N 850737 ZAM

10. Sec. 78-311(e) to authorize minor variations in setback regulations within the development. Deletion of Parcel 8 of Urban Renewal Plan from LSRD Plan Area.

PARCEL 4A (STAGE V) AUTHORIZATIONS—N 860727 ZAM

11. Sec. 78-41 to authorize permitted accessory, off-street parking spaces to be located within the development without regard to zoning lot lines to provide four parking spaces for Parcel 4A.

PARCEL 4B (STAGE VI) AUTHORIZATION—C 950078 ZSM

12. Sec. 78-311(e) authorize location of building without regard for height & setback regulations.

PARCEL 4B (STAGE VI) SPECIAL PERMIT—C 950078 ZSM

13. Sec. 78-312(f) authorize modification of minimum spacing requirements.

PARCEL 4B (STAGE VI) CERTIFICATIONS—C 950078 ZSM

- 14. Sec. 26-07 certification to modify the no curb cut on wide street regulations as required by Sec. 26-05.
- 15. Sec. 37-015 certification to waive retail continuity on wide street.

PARCEL 5 (UNDEVELOPED 2013 APPROVAL)—M 120183 ZSM

- 16. Modification to the LSRD site plan to permit an increase in community facility and total zoning floor area; to authorize a relocation of existing and development of new parking spaces; and to correct zoning calculations

B. HEIGHT & SETBACK(*) AND BUILDING SPACING()
CONDITIONS PREVIOUSLY GRANTED AUTHORIZATION &
SPECIAL PERMITS**

*

<u>Site</u>	<u>Location of Front Wall</u>	<u>Sky Exposure Plane Penetration Proposed</u>
4A	8 ft. from Rutgers Slip	None
4B	Rutgers Slip	114.5 feet
5	Cherry Street	140.5 feet
7	Clinton Street	155 feet
	South Street	57 feet

**

<u>Site</u>	<u>Location of Front Wall</u>	<u>Required Distance</u>	<u>Distance Provided</u>
4	4B bldg. to 1-story stores	40.0a feet	30.0 feet
5	East bldg. to West bldg.	222.4 feet	160.0 feet
	East bldg. on 5 to 6A	148.5 feet	60.0 feet
6	West bldg. on 6B to 6A	87.95 feet	37.0 feet

Note: Zoning regulations have changed since these actions were granted (wall to wall = 40'; window to wall = 50'; window to window= 60').

APPENDIX D
LSRD Zoning Calculations

DRAFT SCOPE OF WORK VERSION Table D
LSRD Zoning Calculations

	Parcel	4	5	Notes	6A	6B ¹	7 ²	TOTAL
	Stage (approved)	V (1985,1986), VI (1995)	III (1977)	-	II (1973)	IV (1982)	I (1972)	
	Block	248	247	-	246	246	245	
	Lot	15, 70, 76	1, 2	-	4, 5	Condo 4101-1057	4	-
ZR Section	Item							
Map 12d	1.	ZONING DISTRICT	C6-4	C6-4	-	C6-4	C6-4	C6-4
	2.	LOT AREA	69,210	145,031	-	71,357	53,821	31,657
32-00	3.	USES PERMITTED	Use group 1-2 (residential); 3-4 (community facility); 5-12 (retail & commercial)					
	4A.	Uses existing	UG 2,3,4,6	UG 2,6	-	UG 2		-
	4B.	Uses proposed	UG 2,3,4,6	UG 2,4,6	a	UG 2,6		-
35-31	5.	FLOOR AREA PERMITTED	(R=Residential; CF=Community Facility; C=Commercial)					
33-122, 23-15	5A.	FAR permitted (R/CF/C)	40	40	-	40	40	-
23-154(a), 23-00		FAR per. R Inclusionary	2	2	-	2	NA	NA
33-123		Total FAR Permitted	42	42	-	42	-	-
35-23	5B.	Floor area permitted						
		-	60,210 x 12 =	145,031 x 12 =	-	71,357 x 12 =	53,821 x 10 =	31,657 x 10 =
		Total any of all uses	830,520	1,740,372	-	856,284	538,210	316,570
	6.	FLOOR AREA PROPOSED						
	6A.	Residential						
		Existing (to remain)	289,561	613,047	d	262,877	65,793	278,000
		New	501,518	1,103,620		590,387	-	2,195,525
		Total	791,079	1,716,667	-	853,264	65,793	3,704,803
	6B.	Community facility		-				
		Existing (to remain)	26,322	0	-	0	-	5,500
		New	0	16,362	-	0	-	16,362
		Total	26,322	16,362	-	0	5,500	48,184
	6C.	Commercial		-				

¹ Parcel 6B is within the LSRD, but it is not part of the proposed project.

² Parcel 7 is within the LSRD, but it is not part of the proposed project.

Table D (cont'd)
LSRD Zoning Calculations

	Parcel	4	5	Notes	6A	6B ¹	7 ²	TOTAL
	Existing (to remain)	10,726	2,024	b	0	-	-	12,750
	New	2,393	5,340		2,506	-	-	10,218
	Total	13,119	7,343	-	2,506	0	0	22,968
6D.	Total floor area proposed		-					
	Existing (to remain)	326,609	615,071	b,d	262,877	65,793	283,500	1,553,850
	New	503,911	1,125,301		593,411	0	0	2,222,105
	Total	830,520	1,740,372		856,288	65,793	283,500	3,775,955
35-40 23-22	7. DENSITY (factor = 680)	LSRD refers to "zoning rooms" which no longer exists; currently "dwelling units" are permitted						
		830,520 -	1,740,372 -		856,284 -	538,210 -	316,570 -	
		26,322 -	16,362 -		0 -	0 -	5,500 -	
		13,119 =	7,343 =		2,506 =	0 =	0 =	
	-	791,079	1,716,667	-	853,778	538,210	311,070	-
		790,099 / 680	1,716,667 /		853,264 /	538,210 / 680	311,070 / 680	
	-	=	680 =	-	680 =	=	=	-
	7A. Dwelling units permitted	1,163	2,525	-	1,256	791	457	6,192
	7B. Dwelling units proposed		-					
	Existing	307	490	-	256	57	250	1,360
	New	660	1,350	-	765	0	0	2,775
	Total	967	1,840	-	1,024	57	250	4,135
	8A. LOT COVERAGE	Not applicable						
12-10	8B. Lot coverage proposed	LSRD refers to "lot coverage" for Urban Renewal purposes (expired)						
	Existing	25,728	24,335		13,836	21,931	10,563	96,393
	New	5,952	31,008	-	15,696	0	0	52,656
	Total	31,680	55,343	-	29,532	21,931	10,563	149,049
	9A. OPEN SPACE	Not applicable						
12-10	9B. Open space proposed							
	Existing	43,920	120,696		57,521	31,890	21,094	275,121
	Proposed	37,530	89,688	-	41,825			169,043
35-50	10. YARDS	Existing, no change	Complies	-	30'			-
33-20, 23-40								

¹ Parcel 6B is within the LSRD, but it is not part of the proposed project.

² Parcel 7 is within the LSRD, but it is not part of the proposed project.

Table D (cont'd)
LSRD Zoning Calculations

		Parcel	4	5	Notes	6A	6B ¹	7 ²	TOTAL
23-65 35-60, 35-63 33-40, 23-60	11-	HEIGHT & SETBACK*	Existing, no change	Complies		Tower setback 15' from narrow street and 10' from wide street			-
23-663	12-	REAR SETBACKS	Existing, no change	Not required		Not required			-
23-711 43-012	13- 14-	MINIMUM DISTANCE** PARKING	Existing, no change	Complies		Not applicable			-
43-41		Required accessory	No new accessory parking required						-
		Proposed accessory	Existing, no changes						-
		Parking proposed							
		Existing	11-	103	b	34	12	30	190
		New	-4	0	-	0	0	0	-4
		Total	7	103	c	34	12	30	186
36-61 36-62	15-	LOADING							
		Required accessory	No accessory loading required for community facility, or first 25,000 SF of retail						-
		Loading proposed	Existing, no changes						-
Notes:									
a. UG4 (community facility without sleeping accommodations).									
b. Based on Oct. 1976 LSRD plan submitted to CPC with parcel 5 application (760143-ZLM) and Certificate of Occupancy dated Oct. 19, 1979.									
c. 103 spaces to be relocated from surface parking lot to parking garage below grade.									
d. Existing Residential Floor Area is based on calculation by Handel Architects dated Feb 22, 2016.									

Final Scope of Work Version Table D
LSRD Zoning Calculations

	Parcel	4	5	6A	6B ¹	7 ¹	Total	Notes
	Stage (approved)	V (1985,1986), VI (1995)	III (1977)	II (1973)	IV (1982)	I (1972)		
	Block	248	247	246	246	245		
	Lot	15, 70, 76	1, 2	1, 5	Condo 1001-1057	1		
ZR Section	Item							
	ZONING DISTRICT	C6-4	C6-4	C6-4	C6-4	C6-4	C6-4	Map 12d
	LOT AREA	69,210	145,031	71,357	53,821	31,657	371,076	
32-00	USES PERMITTED	Use groups 1-2 (residential); 3-4 (community facility); 5-12 (retail & commercial)						
	USES PROPOSED							
	Existing Uses	UG 2, 3, 4, 6	UG 2, 6	UG 2	2	2	UG 2, 3, 4, 6	Complies
	New Building Uses	UG 2, 6	UG 2, 3, 4, 6	UG 2, 6	2	2	UG 2, 3, 4, 6	Complies
	Uses Total	UG 2, 3, 4, 6	UG 2, 3, 4, 6	UG 2, 6	2	2	UG 2, 2, 4, 6	Complies
35-31	FAR PERMITTED							
33-122, 23-15,	Residential	10	10	10	10	10	10	
33-123, 35-23,	Community Facility	10	10	10	10	10	10	
23-154(a), 23-90	Commercial	10	10	10	10	10	10	
	Residential Incl. Housing Bonus	2	2	2	2	2	2	
	Maximum Total	12	12	12	12	12	12	
	FAR PROPOSED (New and Existing)							
	Residential	11.43	11.84	11.97	1.22	8.78	9.99	Complies
	Community Facility	0.38	0.11	0.00	0.00	0.17	0.13	Complies
	Commercial	0.19	0.05	0.03	0.00	0.00	0.06	Complies
	Maximum Total	12.00	12.00	12.00	1.22	8.96	10.18	Complies
	FLOOR AREA PERMITTED							
	Residential	692,100	1,450,310	713,570	538,210	316,570	3,710,760	
	Community Facility	692,100	1,450,310	713,570	538,210	316,570	3,710,760	
	Commercial	692,100	1,450,310	713,570	538,210	316,570	3,710,760	
	Residential Inclusionary	138,420	290,062	142,714	107,642	63,314	742,152	
	Maximum Total	830,520	1,740,372	856,284	645,852	379,884	4,452,912	

¹ **Notes:**

Parcels 6B and 7 are within the LSRD, but are not being modified in conjunction with the proposed projects.

Table D (cont'd)
LSRD Zoning Calculations

Parcel	4	5	6A	6B	7	Total	Notes
FLOOR AREA PROPOSED							
Residential							
Existing (to remain)	289,561	611,348	262,877	65,793	278,000	1,507,579	Complies
New	501,518	1,105,319	590,992	0	0	2,197,829	Complies
Total	791,079	1,716,667	853,869	65,793	278,000	3,705,408	Complies
Community Facility							
Existing (to remain)	26,322	0	0	0	5,500	31,822	Complies
New	0	16,362	0	0	0	16,362	Complies
Total	26,322	16,362	0	0	5,500	48,184	Complies
Commercial							
Existing (to remain)	10,726	2,024	0	0	0	12,750	Complies
New	2,393	5,319	2,415	0	0	10,127	Complies
Total	13,119	7,343	2,415	0	0	22,877	Complies
Total							
Existing (to remain)	-296,480	613,372	262,877	65,793	283,500	929,062	Complies
New	1,127,000	1,127,000	593,407	0	0	2,847,407	Complies
Total	830,520	1,740,372	856,284	65,793	283,500	3,776,469	Complies

12-10	LOT COVERAGE	Not applicable – LSRD refers to "lot coverage" for Urban Renewal purposes (Expired)						
	Required							
	Proposed							
	Existing	25,728	24,335	13,836	21,931	10,563	96,393	Not Applicable
	New	5,952	31,008	15,696	0	0	52,656	Not Applicable
	Total	31,680	55,343	29,532	21,931	10,563	149,049	Not Applicable
12-10	OPEN SPACE	Not applicable						
	Required							
	Existing	43,920	120,696	57,521	31,890	21,094	275,121	Not Applicable
	Proposed	37,530	89,688	41,825	31,890	21,094	222,027	Not Applicable

Table D (cont'd)
LSRD Zoning Calculations

	Parcel	4	5	6A	6B	7	Notes
35-50	YARDS						
33-20, 23-40	Required	No front of side yards required; min. 8' side yard if provided. No rear yard required in R10 equivalent where rear lot line coincides with a side lot line of adjoining lot.	No front of side yards required; min. 8' side yard if provided. Rear yard equivalent required.	No front of side yards required; min. 8' side yard if provided. Along rear lot line, required residential yard depth of 30' and required commercial rear yard depth of 20'.	No front of side yards required; min. 8' side yard if provided. 30' rear yard required at the rear lot line.	No front of side yards required; min. 8' side yard if provided. 30' rear yard required at the rear lot line.	* Waiver #5 (CP21885)
	Proposed	No front or rear yards provided; side yard provided in excess of 8'.	Rear yard equivalent provided.	<u>Rear Yards:</u> Rear yards greater than 30' provided all rear lot lines. <u>Side Yards:</u> Building 6A-1 provides minimum side yard depth of 30'-4". Building 6A-2 does not provide side yards. <u>Front Yard:</u> Provided along South Street; not provided along Clinton Street.	Minimum yards not provided**	Minimum yards not provided***	** Waiver #8 (N 830316 ZAM) *** Waiver #2 (CP21885)
23-65 35-60, 35-63	HEIGHT & SETBACK						
33-40, 23-60	Required	15' minimum tower setback 2.7 to 1 sky exposure plane from narrow street above 85'.	<u>Cherry Street (Wide Street):</u> Max Street Wall 85', Min 10' setback, sky Exposure Plane 5.6:1, except for towers. <u>South Street (Narrow Street):</u> Max Street Wall 85', Min 15' setback, sky exposure plane 2.7:1, except for towers.	<u>Clinton Street:</u> Above 85', 10' minimum tower setback; 5.6:1 sky exposure plane. <u>South Street:</u> Above 85', 15' minimum tower setback; 2.7:1 sky exposure plane.	15' minimum setback 5.6 to 1 sky exposure plane from wide street above 85'.	15'/20' minimum setback 5.6/2.7 to 1 sky exposure plane from wide/narrow street above 85'.	* Waiver #10 (N850737 ZAM) & #12 (C 950078 ZSM) ** Waiver #7 (C760143 ZLM)
	Proposed	<u>Cherry Street:</u> 15' setback at 51.5'; <u>South Street:</u> 40' setback above 40'; <u>Rutgers Slip:</u> Building 4-4 provides 15' setback; Buildings 4-3 & 4-1 provide 8.14' & 8.08' setbacks; Building 4-1 penetrates sky exposure plane for 114.5.*	<u>Cherry Street:</u> Existing building rises without setback within 10' of street line, and penetrates sky exposure plane to a height of 146'-6". **** <u>South Street:</u> Building not within initial set back distance; all portions of building that pierce sky exposure plane comply with Tower Regulations.	<u>Clinton Street – Building 6A-2:</u> 10' setback above 50'-5". <u>South Street – Building 6A-2:</u> 43'-3" setback above 50'-5".	Building does not exceed 85'.	Clinton Street: Penetrates sky exposure plane for 155'. *** South Street: Penetrates sky exposure plane for 57'. ***	*** Waiver #3 (CP21885 & #4 (CP21185)) **** Waiver #6 (C760143 ZLM)

Table D (cont'd)
LSRD Zoning Calculations

	Parcel	4	5	6A	6B	7	Notes
23-711	MINIMUM DISTANCE						
	Required	Wall to Wall – 40' Wall to Window – 50' Window to Window – 60'					* Waiver #13 (C 950078 ZSM)
	Provided	30.17' between buildings 4-1 and 4-2*	<u>Existing buildings</u> separated 160' Window to Window. Complies under current zoning. *** Proposed building. Above a height of 85', Tower C and Tower D are separated by a min 60'.	Building 6A-1 and 6-2 abut.	37' between buildings 6A and 6B.**	N/A	** Waiver #9 (N 830316 ZAM) *** Waiver #7 (C 760143 ZLM) previously granted but no longer necessary

	Parcel	4	5	6A	6B	7	TOTAL	Notes
13-012	PARKING (Accessory)							
	Required	0	0	0	0	0	0	
	Proposed							
	Existing	11	103	34	12	30	190	Complies
	New	-4	0	0	0	0	-4	Complies
	Total	7	103	34	12	30	186	Complies
36-61	LOADING							
36-62	Required	No accessory loading required for community facility, or first 25,000 sf of retail					0	
	Proposed	No loading proposed					0	Complies

APPENDIX E
Transportation Demand Factors Memorandum



Environmental, Planning, and Engineering Consultants

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Draft Travel Demand Factors Memorandum

To: Two Bridges Project File
From: AKRF, Inc.
Date: March 27, 2017
Re: Travel Demand Analysis

A. INTRODUCTION

This memorandum details the trip generation assumptions and travel demand estimates for the Two Bridges Large Scale Residential Development (LSRD) projects in the Lower East Side neighborhood of Manhattan (see **Figure 1**). The three project sites—Site 4 (4A/4B), Site 5, and Site 6A within the Two Bridges LSRD—are generally bounded by Cherry Street to the north, Pike Street to the west, Clinton Street to the east, and South Street to the south. Trip assignments were developed for the proposed projects to identify transportation elements requiring a detailed analysis of potential impacts.

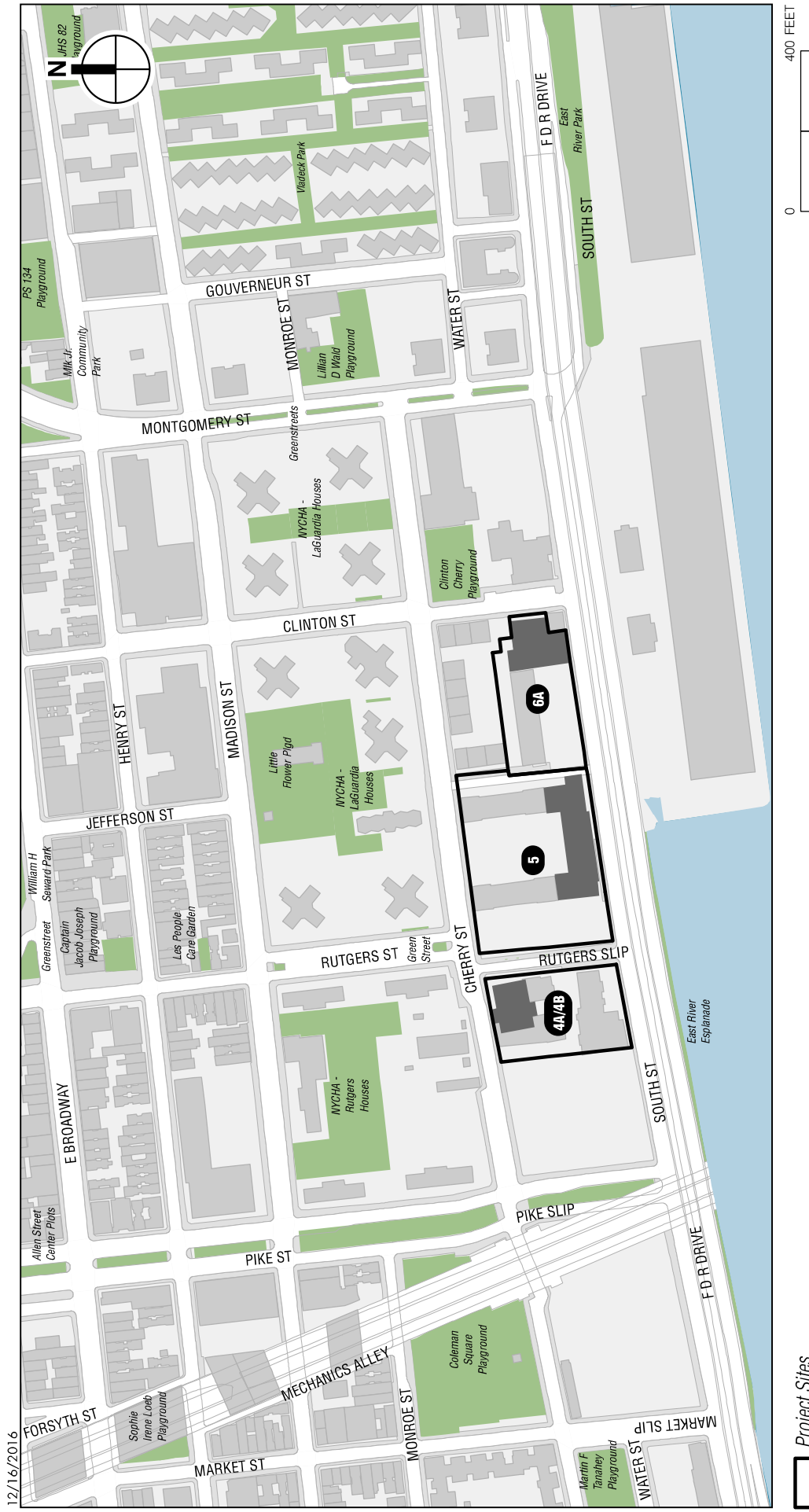
In the future with the proposed actions, the project sites would be developed with a total of approximately 2,775 dwelling units, 10,888 gross square feet (gsf) of local retail, and a 17,028 gsf community facility. The community facility space on Site 5 is as yet unprogrammed; however, for the purposes of a conservative analysis, it is assumed that this space could be utilized as an accessory early childhood educational facility.

Table 1 provides program assumptions under the Reasonable Worst Case Development Scenario (RWCDS) With Action conditions.

**Table 1
Future With the Proposed Actions (RWCDS)**

Site	Components	Future With the Proposed Actions (With Action)
4A/4B	Residential (dwelling units)	660
	Local Retail (1,000 gsf)	3,124
5	Residential (dwelling units)	1,350
	Local Retail (1,000 gsf)	5,258
	Community Facility (1,000 gsf)	17,028
6A	Residential (dwelling units)	765
	Local Retail (1,000 gsf)	2,506

Note: The programs noted above do not include existing uses on the three sites that would remain in the With Action condition.



12/16/2016

- Project Sites
- Proposed Buildings

Project Location
Figure 1

TWO BRIDGES LSRD

PRINCIPAL CONCLUSIONS

TRAFFIC

Based on the detailed assignment of project-generated vehicle trips, numerous area intersections would incur incremental trips exceeding the *City Environmental Quality Review (CEQR) Technical Manual* analysis threshold of 50 peak hour vehicle-trips. In consideration of the area's existing traffic conditions and project-generated vehicle trip assignment patterns, 31 intersections are recommended for inclusion in the detailed analysis of potential traffic impacts.

TRANSIT

The detailed assignment of projected transit trips concluded that the East Broadway Station and the F subway line would incur more than 200 trips during the weekday AM and PM peak hours. Therefore, a detailed subway station analysis of the East Broadway Station and a line-haul analysis of the F subway line would be conducted.

Project-generated bus trips would be dispersed among the multiple local bus routes serving the study area, such that no single bus route is expected to incur incremental ridership exceeding the *CEQR Technical Manual* analysis threshold of 50 or more peak hour bus riders in a single direction. Therefore, a detailed bus line-haul analysis is not warranted, and the proposed project is not expected to result in any significant adverse bus line-haul impacts.

PEDESTRIANS

The detailed assignment of project-generated pedestrian trips concluded that incremental pedestrian volumes at 17 sidewalks, 23 corner reservoirs, and 12 crosswalks at 11 intersections would exceed the *CEQR Technical Manual* analysis threshold of 200 peak hour pedestrian trips. Therefore, a detailed pedestrian analysis would be conducted for these elements.

B. PRELIMINARY ANALYSIS METHODOLOGY

The *CEQR Technical Manual* recommends a two-tier screening procedure for the preparation of a "preliminary analysis" to determine if quantified analyses of transportation conditions are warranted. As discussed below, the preliminary analysis begins with a trip generation analysis (Level 1) to estimate the volume of person and vehicle trips attributable to the proposed project. If the proposed project is expected to result in fewer than 50 peak hour vehicle trips and fewer than 200 peak hour transit or pedestrian trips, further quantified analyses are not warranted. When these thresholds are exceeded, detailed trip assignments (Level 2) are performed to estimate the incremental trips at specific transportation elements and to identify potential locations for further analyses. If the trip assignments show that the proposed project would result in 50 or more peak hour vehicle trips at an intersection, 200 or more peak hour subway trips at a station, 50 or more peak hour bus trips in one direction along a bus route, or 200 or more peak hour pedestrian trips traversing a pedestrian element, then further quantified analyses may be warranted to assess the potential for significant adverse impacts on traffic, transit, pedestrians, parking, and vehicular and pedestrian safety.

C. LEVEL 1 SCREENING ASSESSMENT

A Level 1 trip generation screening assessment was conducted to estimate the numbers of person and vehicle trips by mode expected to be generated by the proposed projects during the weekday AM, midday, and PM peak hours. These estimates were then compared to the *CEQR Technical Manual* thresholds to determine if a Level 2 screening and/or quantified operational analyses would be warranted.

TRANSPORTATION PLANNING ASSUMPTIONS

Trip generation factors for the proposed projects were developed based on information from the 2014 *CEQR Technical Manual*, U.S. Census Data, and other established sources and approved studies—as summarized in **Table 2**.

**Table 2
Travel Demand Assumptions**

Use	Residential			Local Retail			Community Facility Students			Community Facility Parents			Community Facility Staff			
Total Daily Person Trip	(1) Weekday 8.075 Trips / DU			(1) Weekday 205 Trips / 1000 SF			(1) Weekday 2.0 trips/person			(1) Weekday 4.0 trip/person			(1) Weekday 2.0 trips / person			
Trip Linkage	0%			25%			0%			0%			0%			
Net Daily Person trip	Weekday 8.075 Trips / DU			Weekday 153.75 Trips / 1000 SF			Weekday 2.0 Trips / Student			Weekday 4.0 Trips / Student			Weekday 2.0 Trips / Staff			
Temporal	AM	MD	PM	AM	MD	PM	AM	MD	PM	AM	MD	PM	AM	MD	PM	
	(1)			(1)			(1)			(2)			(2)			
	10%	5%	11%	3%	19%	10%	49.5%	0%	49.5%	49.5%	0%	49.5%	40%	0%	40%	
Direction	(2)			(2)			(4)			(4)			(4)			
	In	15%	50%	70%	50%	50%	50%	100%	0%	0%	50%	0%	50%	100%	0%	0%
	Out	85%	50%	30%	50%	50%	50%	0%	0%	100%	50%	0%	50%	0%	0%	100%
Total	100%	100%	100%	100%	100%	100%	100%	0%	100%	100%	0%	100%	100%	0%	100%	
Modal Split	(3)			(2)			(4)			(5)(9)			(6)			
	AM	MD	PM	AM	MD	PM	AM	MD	PM	AM	MD	PM	AM	MD	PM	
Auto	14.0%	14.0%	14.0%	2.0%	2.0%	2.0%	10.0%	10.0%	10.0%	0.0%	0.0%	0.0%	18.0%	18.0%	18.0%	
Taxi	5.0%	5.0%	5.0%	3.0%	3.0%	3.0%	2.0%	2.0%	2.0%	0.0%	0.0%	0.0%	1.0%	1.0%	1.0%	
Subway	44.0%	44.0%	44.0%	6.0%	6.0%	6.0%	8.0%	8.0%	8.0%	23.0%	23.0%	23.0%	58.0%	58.0%	58.0%	
Bus	4.0%	4.0%	4.0%	6.0%	6.0%	6.0%	7.0%	7.0%	7.0%	20.0%	20.0%	20.0%	10.0%	10.0%	10.0%	
School Bus	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	53.0%	53.0%	53.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Walk	33.0%	33.0%	33.0%	83.0%	83.0%	83.0%	20.0%	20.0%	20.0%	57.0%	57.0%	57.0%	13.0%	13.0%	13.0%	
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	
Vehicle Occupancy	(2)(3) Weekday			(2) Weekday			(9) Weekday						(6)(7) Weekday			
	Auto	1.30			1.65			1.30						1.27		
	Taxi	1.40			1.40			1.30						1.27		
School Bus	N/A			N/A			35.0						N/A			
Daily Delivery Trip Generation Rate	(1) Weekday 0.06 Delivery Trips / DU			(1) Weekday 0.35 Delivery Trips / KSF			(8) Weekday 0.03 Delivery Trips / students									
Delivery Temporal	AM	MD	PM	AM	MD	PM	AM	MD	PM							
	(1)			(1)			(8)									
	12%	9%	2%	8%	11%	2%	9.6%	11.0%	1.0%							
Delivery Direction	(1)			(1)			(8)									
	In	50%	50%	50%	50%	50%	50%	50%	50%							
	Out	50%	50%	50%	50%	50%	50%	50%	50%							
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%							
Sources:	(1) 2014 CEQR Technical Manual (2) Seward Park Mixed-Use Development Project FGEIS (2012) (3) U.S. Census Bureau, ACS 2011-2015 Five-Year Estimates - Journey-to-Work (JTW) Data for Census Tract 2.01, 6, 8, 14.01, and 16. (4) Seward Park Mixed-Use Development Tech Memo (2012) (5) Assumes 1 parent for every 1.30 students taking subway, bus and walk modes to the school and the same temporal distribution as students. (6) U.S. Census Bureau Reverse-Journey to Work ACS 2006-2010 five-year estimates. (7) The staff taxi occupancy is assumed to be the same as the staff vehicle occupancy. (8) No. 7 Subway Extension-Hudson Yards Rezoning and Development Program FGEIS (2004) (9) East New York Rezoning FEIS (2016)															

TRIP GENERATION SUMMARY

As summarized in **Table 3**, in the future with the proposed actions, a total of 2,475, 1,444, and 2,817 person trips would be generated during the weekday AM, midday, and PM peak hours, respectively. Correspondingly, 435, 214, and 424 vehicle trips would be generated during the same respective peak hours.

Table 3
Trip Generation Summary: Future With the Proposed Actions

	Program	Peak Hour	In/Out	Person Trip							Vehicle Trip				
				Auto	Taxi	Subway	Bus	School Bus	Walk	Total	Auto	Taxi	School Bus	Delivery	Total
Site 4	Residential 660 DUs	AM	In	11	4	35	3	0	26	79	8	17	0	2	27
			Out	63	23	199	18	0	149	452	48	17	0	2	67
			Total	74	27	234	21	0	175	531	56	34	0	4	94
		Midday	In	19	7	59	5	0	44	134	15	8	0	2	25
			Out	19	7	59	5	0	44	134	15	8	0	2	25
			Total	38	14	118	10	0	88	268	30	16	0	4	50
	PM	In	57	21	181	16	0	135	410	44	15	0	0	59	
		Out	25	9	77	7	0	58	176	19	15	0	0	34	
		Total	82	30	258	23	0	193	586	63	30	0	0	93	
	Local Retail 3,124 gsf	AM	In	0	0	0	0	0	6	6	0	0	0	0	0
			Out	0	0	0	0	0	6	6	0	0	0	0	0
			Total	0	0	0	0	0	12	12	0	0	0	0	0
Midday		In	1	1	3	3	0	38	46	1	1	0	0	2	
		Out	1	1	3	3	0	38	46	1	1	0	0	2	
		Total	2	2	6	6	0	76	92	2	2	0	0	4	
PM	In	0	1	1	1	0	20	23	0	1	0	0	1		
	Out	0	1	1	1	0	20	23	0	1	0	0	1		
	Total	0	2	2	2	0	40	46	0	2	0	0	2		
Site 5	Residential 1,350 DUs	AM	In	23	8	72	7	0	54	164	18	35	0	5	58
			Out	130	46	408	37	0	306	927	100	35	0	5	140
			Total	153	54	480	44	0	360	1,091	118	70	0	10	198
		Midday	In	38	14	120	11	0	90	273	29	15	0	4	48
			Out	38	14	120	11	0	90	273	29	15	0	4	48
			Total	76	28	240	22	0	180	546	58	30	0	8	96
	PM	In	118	42	369	34	0	277	840	91	29	0	1	121	
		Out	50	18	158	14	0	119	359	38	29	0	1	68	
		Total	168	60	527	48	0	396	1,199	129	58	0	2	189	
	Local Retail 5,258 gsf	AM	In	0	0	1	1	0	10	12	0	0	0	0	0
			Out	0	0	1	1	0	10	12	0	0	0	0	0
			Total	0	0	2	2	0	20	24	0	0	0	0	0
Midday		In	2	2	5	5	0	64	78	1	1	0	0	2	
		Out	2	2	5	5	0	64	78	1	1	0	0	2	
		Total	4	4	10	10	0	128	156	2	2	0	0	4	
PM	In	1	1	2	2	0	34	40	1	1	0	0	2		
	Out	1	1	2	2	0	34	40	1	1	0	0	2		
	Total	2	2	4	4	0	68	80	2	2	0	0	4		
Community Facility 118 Students	AM	In	12	2	9	8	62	23	116	9	2	2	0	13	
		Out	0	0	0	0	0	0	0	9	2	2	0	13	
		Total	12	2	9	8	62	23	116	18	4	4	0	26	
	Midday	In	0	0	0	0	0	0	0	0	0	0	0	0	
		Out	0	0	0	0	0	0	0	0	0	0	0	0	
		Total	0	0	0	0	0	0	0	0	0	0	0	0	
PM	In	0	0	0	0	0	0	0	0	9	1	2	0	12	
	Out	12	2	9	8	62	23	116	9	1	2	0	12		
	Total	12	2	9	8	62	23	116	18	2	4	0	24		
Community Facility 32 Parents	AM	In	0	0	7	6	0	18	31	0	0	0	0	0	
		Out	0	0	7	6	0	18	31	0	0	0	0	0	
		Total	0	0	14	12	0	36	62	0	0	0	0	0	
	Midday	In	0	0	0	0	0	0	0	0	0	0	0	0	
		Out	0	0	0	0	0	0	0	0	0	0	0	0	
		Total	0	0	0	0	0	0	0	0	0	0	0	0	
PM	In	0	0	7	6	0	18	31	0	0	0	0	0		
	Out	0	0	7	6	0	18	31	0	0	0	0	0		
	Total	0	0	14	12	0	36	62	0	0	0	0	0		
Community Facility 12 Staff	AM	In	2	0	6	1	0	1	10	2	0	0	0	2	
		Out	0	0	0	0	0	0	0	0	0	0	0	0	
		Total	2	0	6	1	0	1	10	2	0	0	0	2	
	Midday	In	0	0	0	0	0	0	0	0	0	0	0	0	
		Out	0	0	0	0	0	0	0	0	0	0	0	0	
		Total	0	0	0	0	0	0	0	0	0	0	0	0	
PM	In	0	0	0	0	0	0	0	0	0	0	0	0		
	Out	2	0	6	1	0	1	10	2	0	0	0	2		
	Total	2	0	6	1	0	1	10	2	0	0	0	2		

Table 3 (cont'd)
Trip Generation Summary: Future With the Proposed Actions

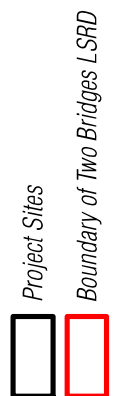
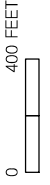
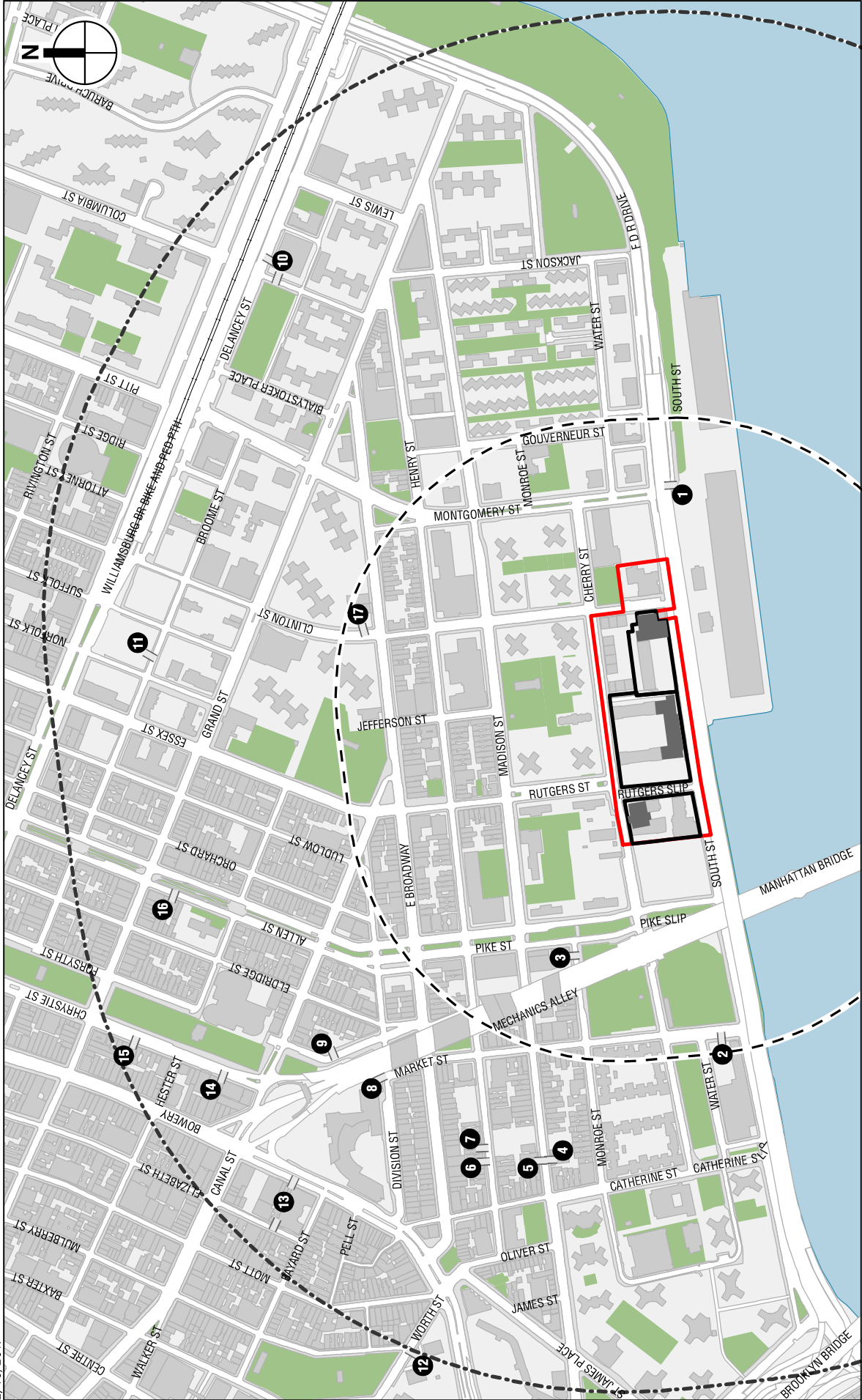
	Program	Peak Hour	In/Out	Person Trip							Vehicle Trip				
				Auto	Taxi	Subway	Bus	School Bus	Walk	Total	Auto	Taxi	School Bus	Delivery	Total
Site 6A	Residential 765 DUs	AM	In	13	5	41	4	0	31	94	10	21	0	3	34
			Out	74	26	231	21	0	173	525	57	21	0	3	81
			Total	87	31	272	25	0	204	619	67	42	0	6	115
		Midday	In	22	8	68	6	0	51	155	17	9	0	2	28
			Out	22	8	68	6	0	51	155	17	9	0	2	28
			Total	44	16	136	12	0	102	310	34	18	0	4	56
		PM	In	67	24	209	19	0	157	476	52	17	0	0	69
			Out	29	10	90	8	0	67	204	22	17	0	0	39
			Total	96	34	299	27	0	224	680	74	34	0	0	108
	Local Retail 2,506 gsf	AM	In	0	0	0	0	0	5	5	0	0	0	0	0
			Out	0	0	0	0	0	5	5	0	0	0	0	0
			Total	0	0	0	0	0	10	10	0	0	0	0	0
		Midday	In	1	1	2	2	0	30	36	1	1	0	0	2
			Out	1	1	2	2	0	30	36	1	1	0	0	2
			Total	2	2	4	4	0	60	72	2	2	0	0	4
PM		In	0	1	1	1	0	16	19	0	1	0	0	1	
		Out	0	1	1	1	0	16	19	0	1	0	0	1	
		Total	0	2	2	2	0	32	38	0	2	0	0	2	
Grand Total	AM	In	61	19	171	30	62	174	517	47	75	2	10	134	
		Out	267	95	846	83	0	667	1,958	214	75	2	10	301	
		Total	328	114	1,017	113	62	841	2,475	261	150	4	20	435	
	Midday	In	83	33	257	32	0	317	722	64	35	0	8	107	
		Out	83	33	257	32	0	317	722	64	35	0	8	107	
		Total	166	66	514	64	0	634	1,444	128	70	0	16	214	
	PM	In	243	90	770	79	0	657	1,839	197	65	2	1	265	
		Out	119	42	351	48	62	356	978	91	65	2	1	159	
		Total	362	132	1,121	127	62	1,013	2,817	288	130	4	2	424	

D. LEVEL 2 SCREENING ASSESSMENT

TRAFFIC

As shown in **Table 3**, incremental vehicle trips resulting from the proposed projects would exceed the *CEQR* Level 1 screening threshold during all peak hours. Although the proposed project for Site 5 would maintain the 103 parking spaces that currently exist on that site, those spaces would be used solely to accommodate the existing parking demand on Site 5. Off-site parking resources would be used to accommodate the parking demand for the three proposed projects. A ¼-mile off-street parking survey was conducted to determine the available off-street parking resources in the study area. Availability of off-street parking spaces within the ¼-mile study area is limited; therefore, the off-street parking survey was expanded slightly beyond the ¼-mile study area to identify other available off-street parking resources within a ½-mile. As summarized in **Table 4** and depicted on **Figure 2**, there are nine off-street parking facilities identified within approximately ¼-mile of the project sites, providing nearly 1,200 parking spaces; however, it should be noted that the 400-space Imperial Parking location (#1) is planned for redevelopment, and thus is expected to be closed in the future. Within the ½-mile study area there are eight additional off-street parking facilities providing nearly 1,900 additional parking spaces.

2/16/2017



Off-Street Parking Facilities
Figure 2

Project Sites
Boundary of Two Bridges LSRD
Proposed Buildings
TWO BRIDGES LSRD

Table 4
Existing Weekday Off-Street Parking Utilization
Approximately ½-mile Study Area

Map #	Name/Operator and Address/Location	License Number	Licensed Capacity	Utilization Rate				Utilized Spaces				Available Spaces			
				AM	MD	PM	ON	AM	MD	PM	ON	AM	MD	PM	ON
1	Imperial Parking LLC: Pier 42, South FDR	1446819	400	85%	85%	85%	85%	340	340	340	340	60	60	60	60
2	Edison NY Parking LLC: 220 South Street	1134501	63	80%	85%	50%	50%	50	54	32	32	13	9	31	31
3	Kaylee Operating LLC: 148 Madison Street	1155046	66	80%	85%	50%	50%	53	56	33	33	13	10	33	33
4	Madison Street Operating Corp: 88 Madison Street	908352	50	80%	80%	50%	Closed	40	40	25	Closed	10	10	25	Closed
5	10 Street Parking Corp: 38 Henry Street	925245	150	75%	75%	80%	80%	113	113	120	120	37	37	30	30
6	Henry Operating Corp: 47 Henry Street	1057433	8	100%	100%	100%	Closed	8	8	8	Closed	0	0	0	Closed
7	Henry Operating Corp: 49-59 Henry Street	1039024	114	40%	70%	40%	40%	46	80	46	46	68	34	68	68
8	Champion Confucius: 2-68 Division Street	1146910	300	70%	85%	85%	50%	210	255	255	150	90	45	45	150
9	Bridge View Auto Service Center: 26 Forsyth Street	954225	42	90%	90%	90%	90%	38	38	38	38	4	4	4	4
¼-Mile Area Only Totals			1,193	75%	82%	75%	64%	898	984	897	759	295	209	296	376
10	Area Garage LLC: (unlisted)	429851	457	40%	88%	60%	25%	183	402	274	114	274	55	183	343
11	Lower East Side District Mgmt. Assoc. - 135-163 Delancey Street	2008327	294	70%	90%	75%	55%	206	265	221	162	88	29	73	132
12	Chatham Parking Systems Inc. – 180 Park Row	368910	130	65%	85%	85%	65%	85	111	111	85	45	19	19	45
13	Quik Park Garage Inc. – 2-8 Elizabeth Street	1461597	140	60%	85%	60%	30%	84	119	84	42	56	21	56	98
14	T&K Park Inc. – 61 Christie Street	1344945	50	20%	90%	55%	25%	10	45	28	13	40	5	22	37
15	MTP Operating Corp. – 89-93 Christie Street	977117	116	80%	80%	60%	60%	93	93	70	70	23	23	46	46
16	59 Allen Street Garage Corp. – 59-63 Allen Street	1192853	200	65%	85%	75%	55%	130	170	150	110	70	30	50	90
17	Clinton Grand Parking LLC – 240 E. Broadway	2034514	505	60%	90%	60%	55%	303	455	303	278	202	50	202	227
Total ½-Mile Area			3,085	65%	86%	69%	53%	1,992	2,644	2,138	1,633	1,093	441	947	1,394
Notes:		MD = Midday; ON = Overnight; CLD = Closed													
Sources:		Survey conducted by AKRF Inc. in February and September, 2016.													

Project-generated vehicle trips were assigned to study area intersections based on the most likely travel routes to and from the project sites, prevailing travel patterns, commuter origin-destination (O-D) summaries from the census data, and configuration of the roadway network. Since available parking spaces at off-site parking facilities within a ¼-mile are expected to be insufficient to accommodate the proposed projects' anticipated parking demand; project-generated trips were also assigned to parking resources between ¼-mile and ½-mile distance from the project sites. Non-pick-up and drop-off auto trips were assigned to the parking facilities summarized above (excluding #1, as that facility is planned for redevelopment). Taxi trips were assigned to the various project sites' frontages along South Street, Rutgers Street, and Clinton Street. All delivery trips were assigned to the project sites via the New York City Department of Transportation (NYCDOT) designated truck routes. Traffic assignments for autos, taxis, and deliveries for the various development uses are discussed below.

RESIDENTIAL

Auto trips generated by the proposed residential uses were assigned to the surrounding roadway network based on the 2006-2010 U.S. Census ACS JTW origin-destination estimates. Many of the residential trips would be traveling to work destinations within the local region of Manhattan (31 percent), with the remaining trips traveling to Brooklyn (17 percent), New Jersey (17 percent), Queens (11 percent), Upstate New York and others (10 percent), Staten Island (8 percent), the Bronx (4 percent), and Long Island (2

percent). Residential trips would originate from off-site parking facilities to which project-generated trips were assigned and use the most direct routes for travel to their destinations. Overall, vehicle trips generated by the proposed residential uses were distributed to the study area roadway network in the following manner: approximately 34 percent assigned to points north of the project site, 30 percent to points west, 24 percent to points southeast, and 12 percent to points east. The majority of trips traveling to Brooklyn and Staten Island south were assigned to the FDR Drive, with the remaining trips utilizing West Street, the Manhattan Bridge, the Queensboro Bridge, the Queens-Midtown Tunnel, the Williamsburg Bridge, and the Brooklyn Bridge, as well as Allen Street and Canal Street. Vehicles heading to New Jersey, Pennsylvania, and Manhattan west of the project site were assigned primarily to South Street and Worth Street. Eastbound trips to Queens and Long Island were assigned to the Queensboro Bridge, Queen-Midtown Tunnel, and the Williamsburg Bridge. Vehicles traveling to Manhattan north of the project site, the Bronx, and Upstate were assigned to the FDR Drive and West Street.

COMMUNITY FACILITY

The proposed community facility use is expected to serve patrons primarily from the immediate area. Therefore, auto trips were generally assigned from local origins within the neighborhood and adjacent residential areas. Overall, the vehicle trips generated by the proposed community facility use were distributed to the study area roadway network in the following manner: approximately 35 percent assigned to points north of the project site, 35 percent to points east, and 30 percent to points southeast.

LOCAL RETAIL

The proposed local retail uses are expected to also serve patrons primarily from the immediate area, following the same general distribution described above for the community facility. Travel to the various off-site parking options would occur via the major roadways surrounding the project sites, including Bowery, Allen Street, and Grand Street.

TAXIS

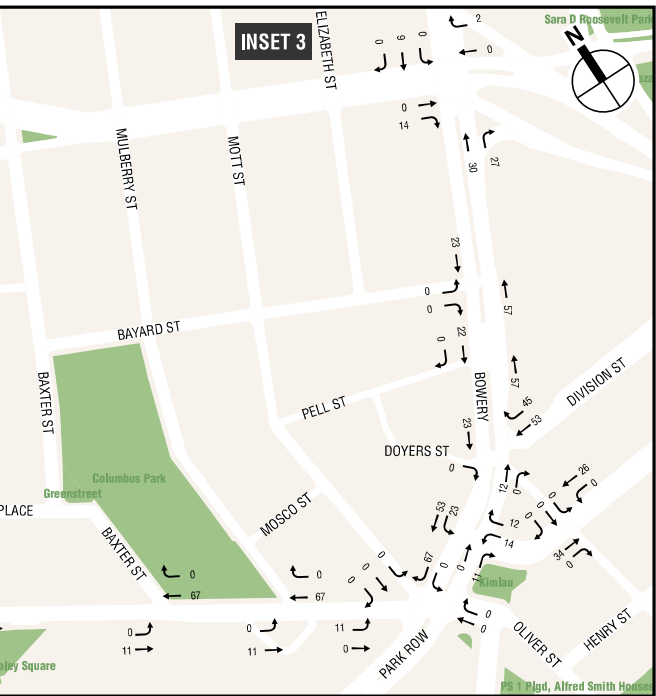
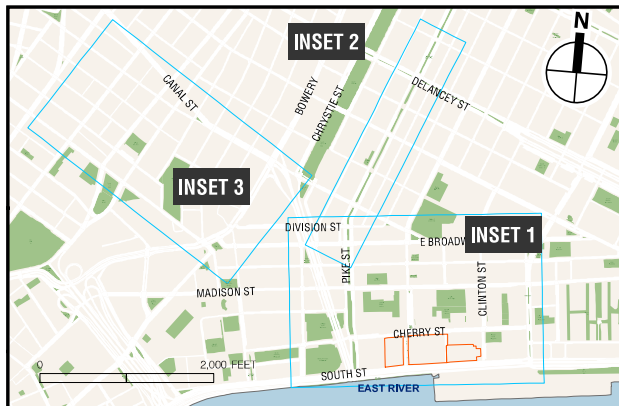
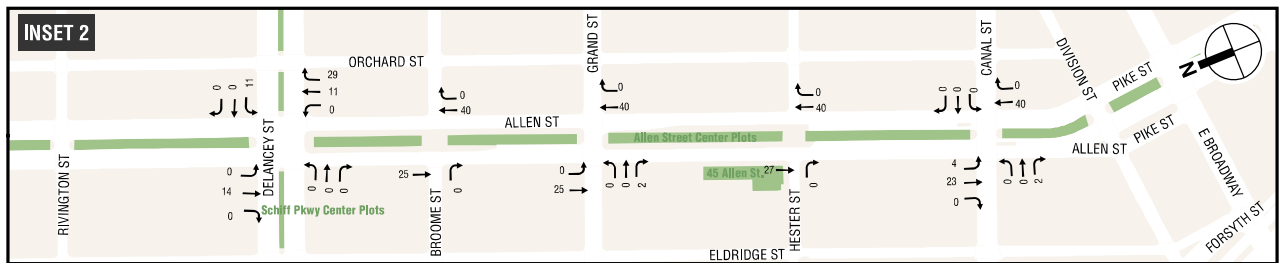
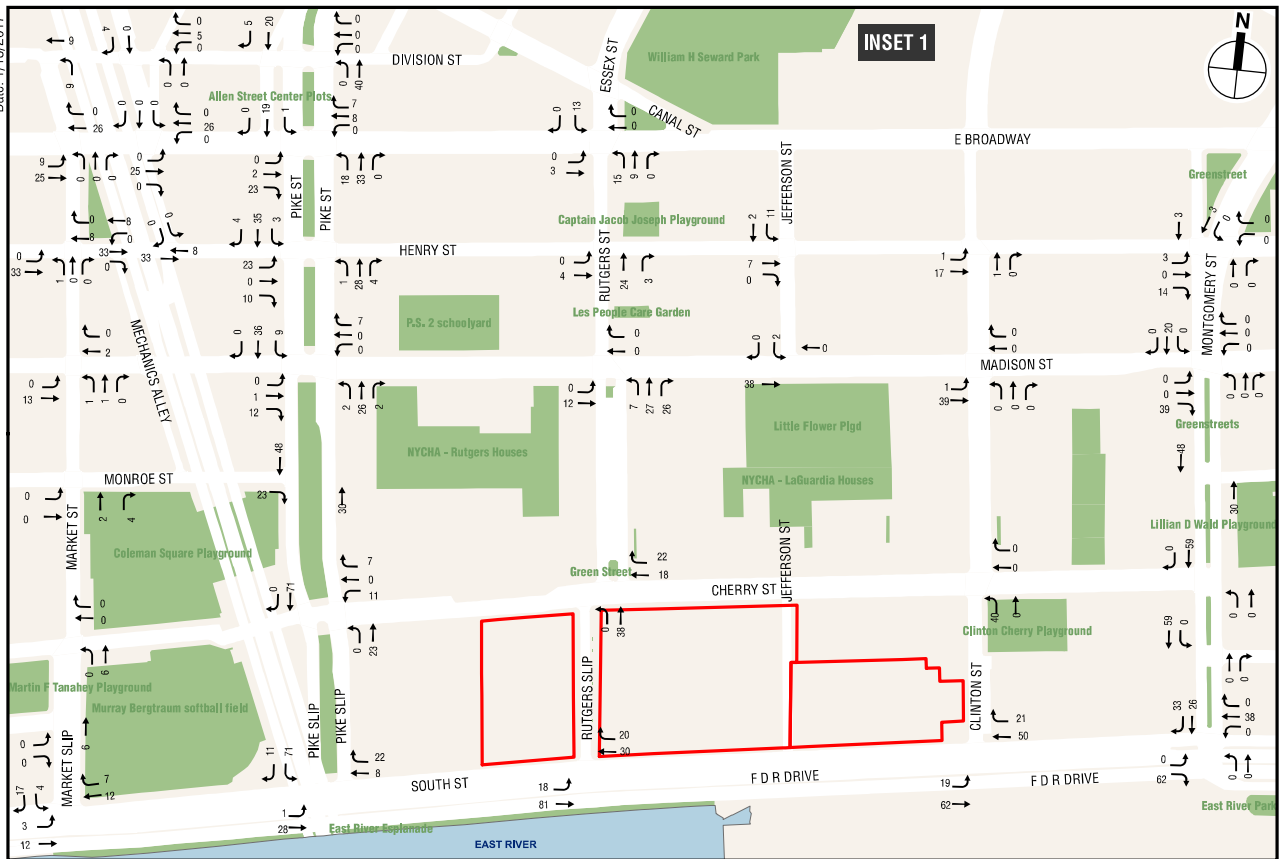
Taxi pick-ups and drop-offs for the proposed residential components were split among the project sites' frontages along South Street, Rutgers Street, and Clinton Street. Taxi trips for the proposed local retail components were assigned to the Cherry Street and Rutgers Street curbsides facing the sites. All taxi trips for the proposed community facility were assigned to the South Street curbside in front of Site 5.

DELIVERIES

Truck delivery trips for all land uses were assigned to NYCDOT-designated truck routes as long as possible until reaching the area surrounding the project sites. These trips were then distributed primarily along South Street and Cherry Street.

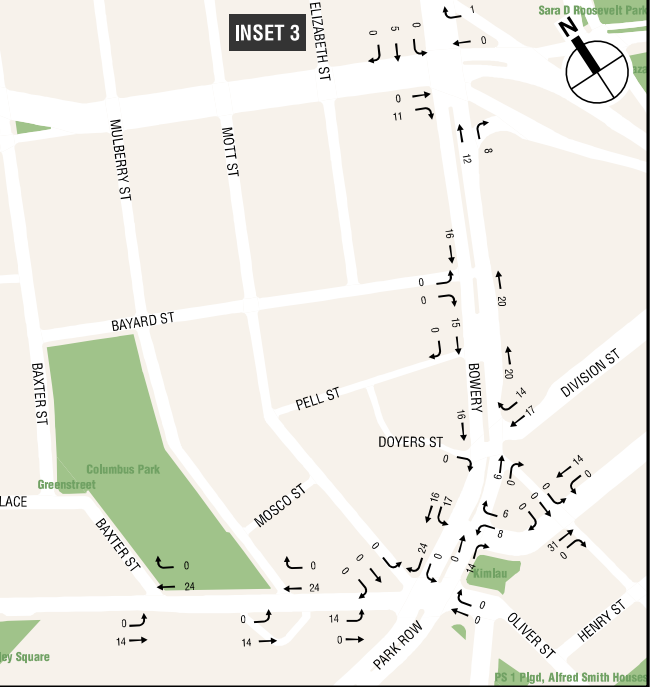
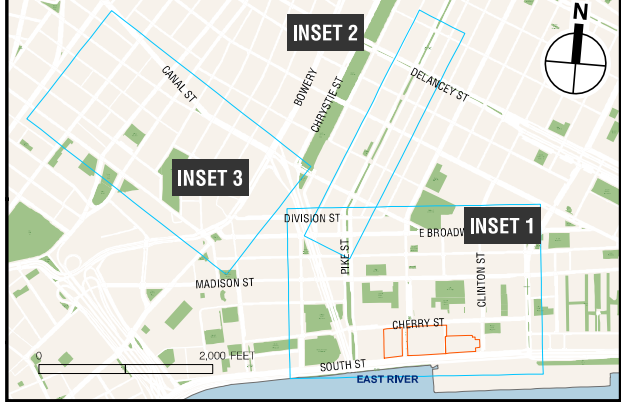
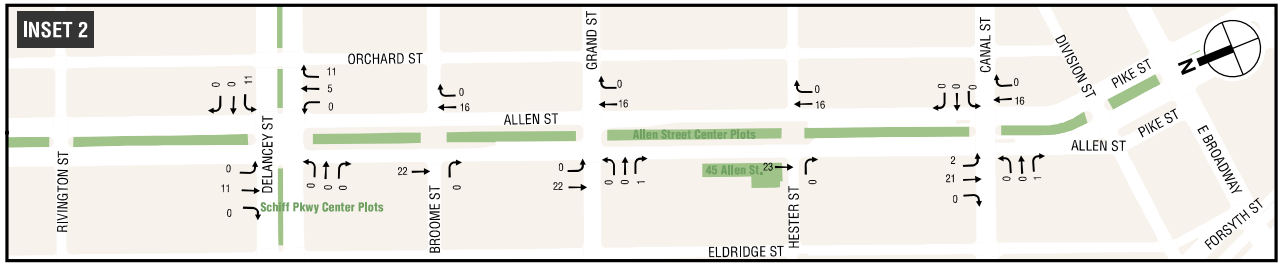
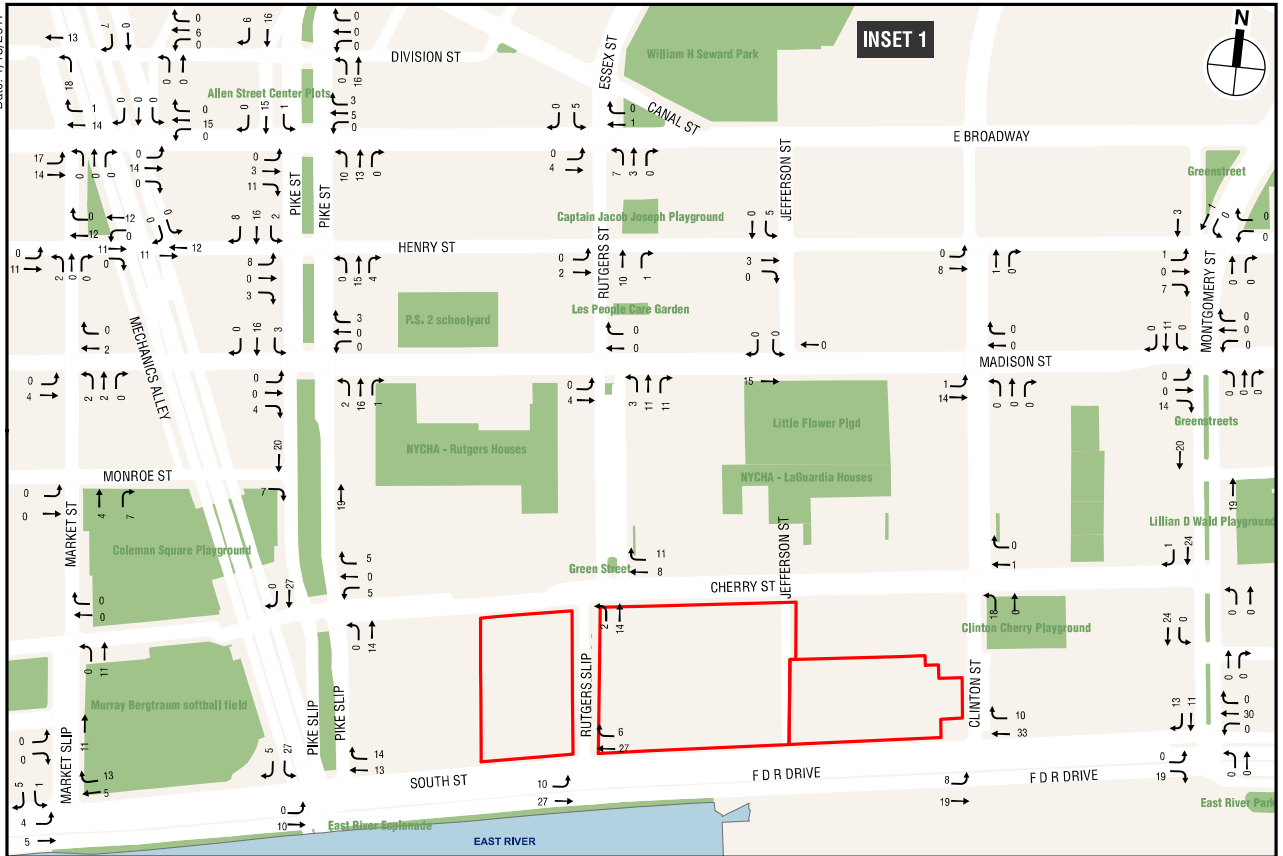
SUMMARY

As shown in **Figures 3 through 5** and summarized in **Table 5**, 31 intersections comprising the traffic study area have been selected for analysis. The selected traffic analysis locations are shown in **Figure 6**.



Project Site

Date: 1/13/2017

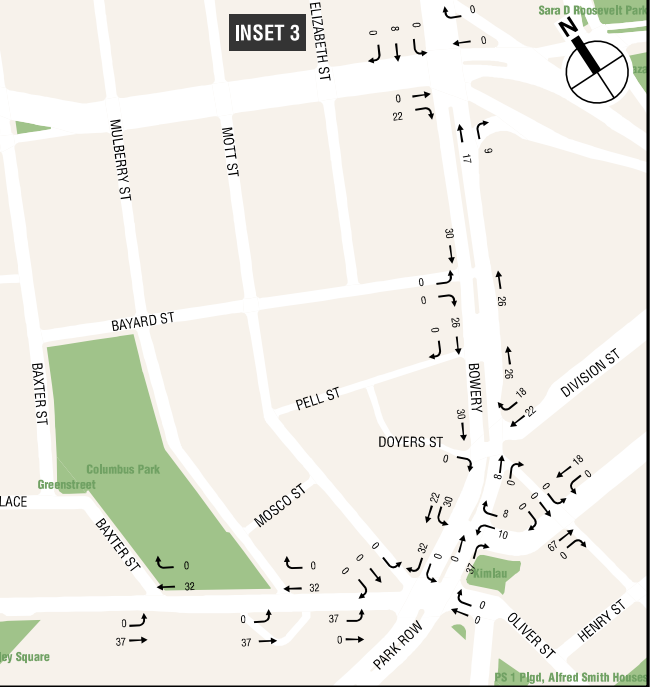
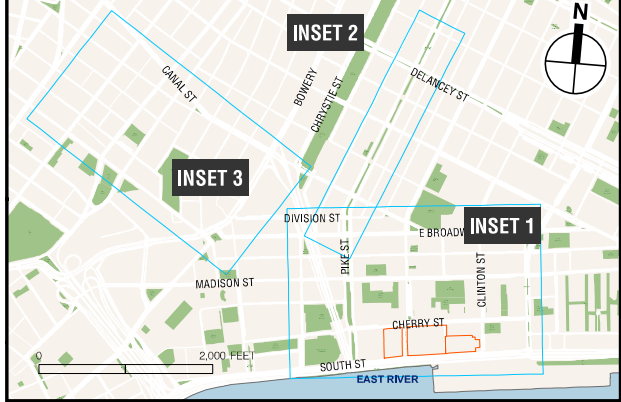
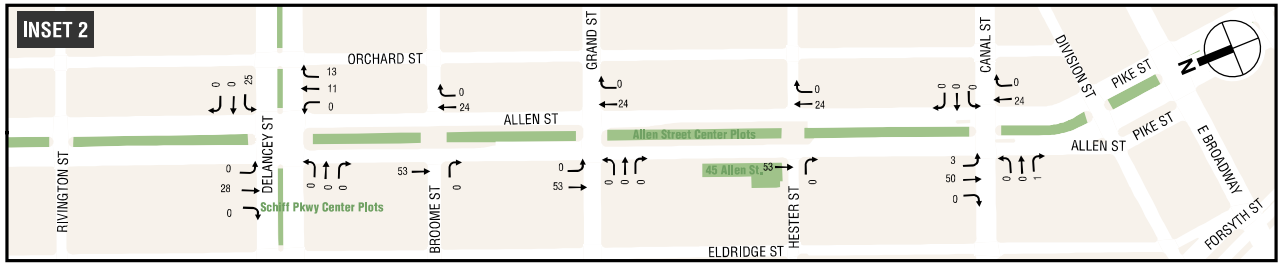
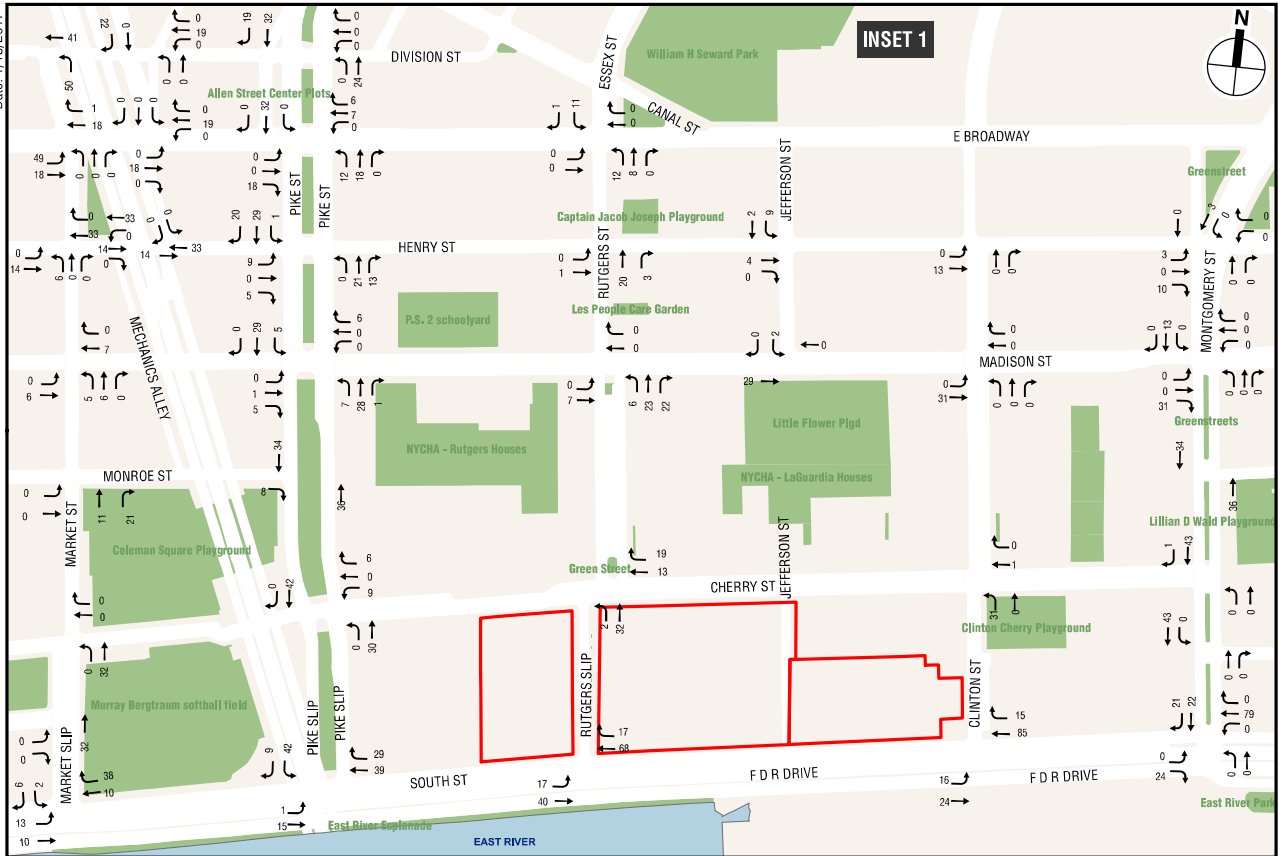


Project Site

TWO BRIDGES LSRD

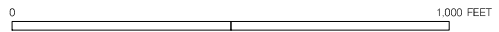
Proposed Project Incremental Vehicle Trips
Weekday MD Peak Hour
Figure 4

0 1,000 FEET



Project Site

Proposed Project Incremental Vehicle Trips
Weekday PM Peak Hour
Figure 5





Recommended Traffic Analysis Locations
Figure 6

1/13/2017

TWO BRIDGES LSRD

Table 5

Traffic Level 2 Screening Analysis Results – Recommended Analysis Locations

Traffic Intersections	AM	MD	PM	Recommended Analysis Location
Grand Street and Bowery	41	18	25	
Grand Street and Allen Street	67	39	77	✓
Hester Street and Bowery	41	18	25	
Hester Street and Pike Street	67	39	77	
Canal Street/Manhattan Bridge Entrance (BK) and Bowery Street	82	37	56	✓
Canal Street and Manhattan Bridge Lower Level	2	1	0	
Canal Street and Manhattan bridge Upper Level/ Chrystie Street	6	8	23	
Canal Street and Forsyth Street	6	8	23	
Canal Street and Eldridge Street	2	1	1	
Canal Street and Allen Street	69	40	78	✓
Bowery and Bayard Street	80	36	56	✓
Pell Street and Bowery	79	35	52	
Division Street and Bowery	133	53	78	✓
Division Street and Market Street	18	31	91	✓
Division Street and Forsyth Street/Eldridge Street	9	13	41	
Division Street and Allen Street	65	38	75	✓
Worth Street and Mott Street	78	38	69	✓
Chatham Square and East Broadway	113	61	107	✓
East Broadway and Catherine Street	60	45	85	✓
East Broadway and Market Street	60	46	86	✓
East Broadway and Forsyth Street	51	29	37	
East Broadway and Allen Street	111	61	93	✓
East Broadway and Essex Street	40	20	32	
Henry Street and Market Street	42	25	53	✓
Henry Street and Mechanics Alley	41	23	47	
Henry Street and Forsyth Street	41	23	47	
Henry Street and Pike Street	108	56	98	✓
Henry Street and Rutgers Street	31	13	24	
Henry Street and Jefferson Street	20	8	15	
Henry Street and Clinton Street	19	9	13	
Henry Street and Montgomery Street	20	11	13	
Madison Street and Market Street	17	10	24	
Madison Street and Mechanics Alley	15	6	13	
Madison Street and Pike Street	95	45	82	✓
Madison Street and Rutgers Street	72	29	58	✓
Madison Street and Jefferson Street	40	15	31	
Madison Street and Clinton Street	40	15	31	
Madison Street and Montgomery Street	59	25	44	✓
Monroe Street and Market Street	6	11	32	
Monroe Street and Mechanics Alley	4	7	21	
Monroe Street and Pike Street	101	46	78	✓
Monroe Street/ Catherine Street and Montgomery Street	59	25	44	
Cherry Street and Market Street	6	11	32	
Cherry Street and Pike Street	112	51	87	✓
Cherry Street and Rutgers Street	78	35	66	✓
Cherry Street and Clinton Street	40	19	32	✓
Cherry Street and Montgomery Street	59	25	44	✓
Water Street and Market Street	6	11	32	
Water Street and Montgomery Street	59	24	43	
South Street and Market Street	55	33	79	✓
South Street and Pike Street	141	69	135	✓
South Street and Rutgers Street	149	70	142	✓
South Street and Clinton Street	152	70	140	✓
South Street/ FDR North Ramp and Montgomery Street	159	73	146	✓
Worth Street and Church Street	45	19	34	
Worth Street and Broadway	49	26	51	✓
Worth Street and Lafayette Street	53	28	54	✓
Worth Street and Centre Street	78	38	69	✓
Worth Street and Baxter Street	78	38	69	
Worth Street and Mullberry Street	78	38	69	
Delancy Street and Allen Street	65	38	77	✓
Broome Street and Allen Street	65	38	77	

Note: ✓ denotes intersections recommended for detailed traffic analysis.

TRANSIT

As shown in **Table 3**, the incremental subway trips generated by the proposed projects would be 1,017, 514, and 1,121 person trips during the weekday AM, midday, and PM peak hours, respectively. Since the incremental subway trips would be greater than 200 during the weekday AM and PM peak hours and the

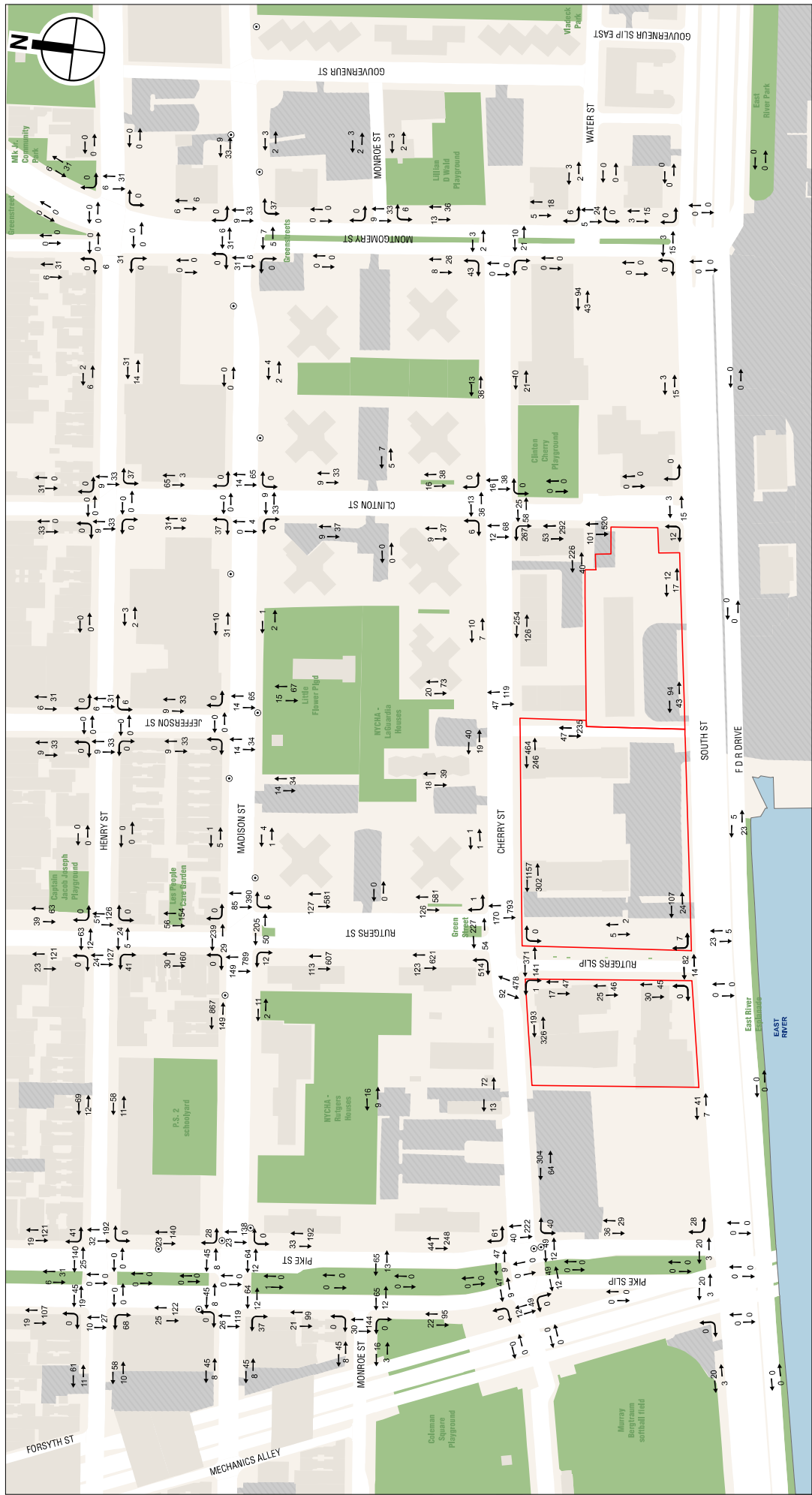
majority of these trips would be expected to use the East Broadway Station (F line), a detailed analysis of subway facilities at this station and line-haul conditions on the F line would be conducted. Also as shown in **Table 3**, the incremental bus trips generated by the proposed projects would be 113, 64, and 127 person trips during the weekday AM, midday, and PM peak hours, respectively. Considering that these trips would be further dispersed among the multiple local bus routes serving the study area, including the M9, M15, M15Select and M22, no single bus route would exceed the *CEQR Technical Manual* analysis threshold of 50 or more peak hour bus riders in a single direction. Therefore, a detailed bus line-haul analysis would not be warranted, and the proposed projects are not expected to result in any significant adverse bus line-haul impacts.

PEDESTRIANS

All person trips generated by the proposed projects would traverse the pedestrian elements (i.e., sidewalks, corners, and crosswalks) surrounding the project sites. As shown in **Table 3**, the net incremental pedestrian trips would be greater than 200 during the weekday AM, midday, and PM peak hours. A Level 2 screening assessment (presented below) was conducted to identify specific pedestrian elements that are expected to incur 200 or more peak hour pedestrian-trips and which would be subject to a detailed analysis of potential pedestrian impacts.

- Auto Trips – Motorists would park at the nearby off-site parking facilities and travel along the area intersections to enter the project sites via adjacent sidewalks.
- Taxi Trips – Taxi users would get dropped off and picked up near the entrances of the project sites.
- Bus Trips – Bus riders would use numerous area bus routes (M9, M15 local, M15 SBS, and M22) and would get on and off at the bus stops located in the vicinity of the project sites.
- Subway Trips – The majority of the project-generated subway riders were assigned to the East Broadway (F line) station and a small portion were assigned to Grand Street (B and D) station.
- Walk-Only Trips – Pedestrian walk-only trip assignments were developed by reviewing the proposed projects' various land uses and population distribution within walking distance from the project sites and distributing the walk-only person trips to surrounding pedestrian facilities, including sidewalks, corner reservoirs, and crosswalks.

Based on the detailed assignment of pedestrian trips, shown in **Figures 7 through 9**, 17 sidewalks, 23 corner reservoirs, and 12 crosswalks were selected for a detailed analysis of weekday peak hour conditions. These locations and associated trip increments are summarized in **Table 6** and depicted in **Figure 10**.



Date: 1/13/2017

Project Site

TWO BRIDGES LSPD

Proposed Project Incremental Pedestrian Trips
Weekday AM Peak Hour
Figure 7

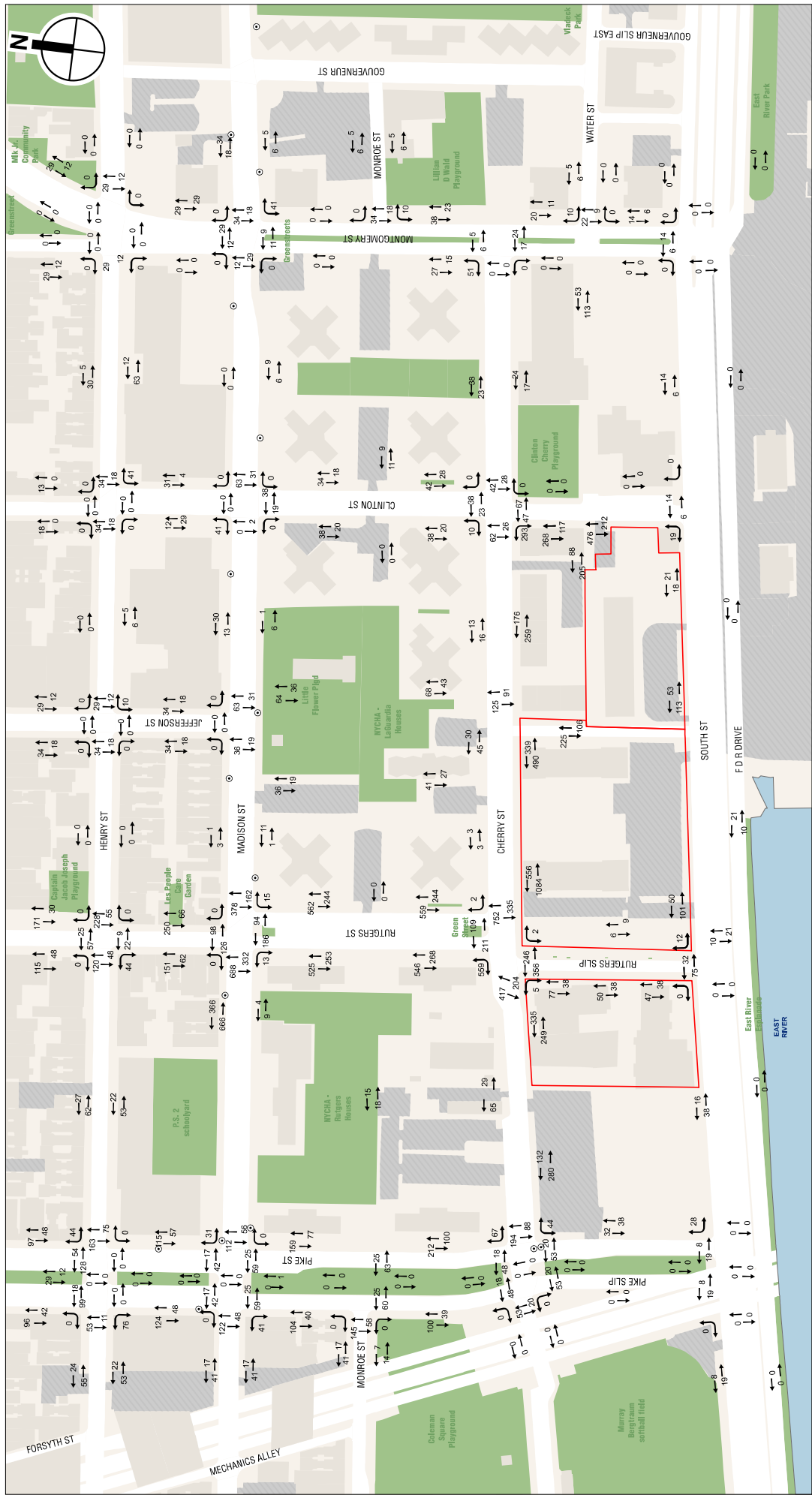


Date: 1/13/2017

Project Site

TWO BRIDGES LSAD

Proposed Project Incremental Pedestrian Trips
Weekday MD Peak Hour
Figure 8

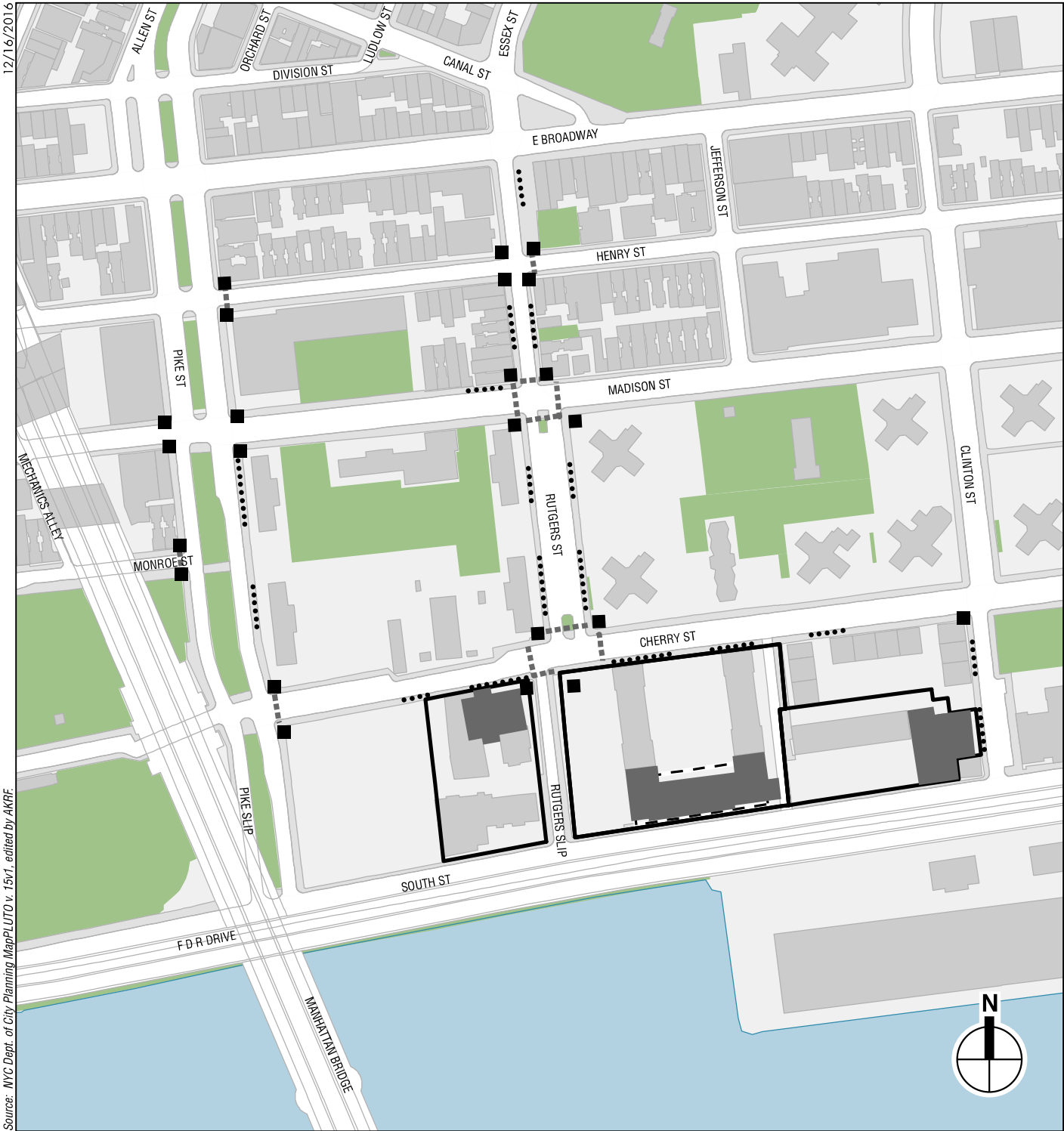







Date: 1/13/2017

Project Site

TWO BRIDGES LSAD

Proposed Project Incremental Pedestrian Trips
Weekday PM Peak Hour
Figure 9



-  Project Sites
-  Proposed Buildings
-  Crosswalk
-  Sidewalk
-  Corner

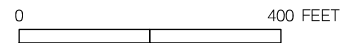


Table 6

Pedestrian Level 2 Screening Analysis Results: Incremental Pedestrian Volumes

Pedestrian Elements	AM	MD	PM
Pike Street and Henry Street			
East Crosswalk	224	113	238
NE Corner	430	215	464
SE Corner	224	113	238
Rutgers Street and Henry Street			
East Crosswalk	177	126	283
NE Corner	252	164	365
SE Corner	206	142	314
SW Corner	221	113	243
NW Corner	226	115	250
East Sidewalk between Henry Street and E. Broadway	102	87	201
East Sidewalk between Madison Street and Henry Street	210	141	316
West Sidewalk between Madison Street and Henry Street	190	96	213
Pike Street and Madison Street (West)			
SW Corner	258	132	295
NW Corner	198	102	229
Pike Street and Madison Street (East)			
East Sidewalk between Madison Street and Monroe Street	225	114	236
NE Corner	242	122	252
SE Corner	237	120	252
Rutgers Street and Madison Street			
North Crosswalk	268	113	224
East Crosswalk	475	254	540
South Crosswalk	255	128	280
West Crosswalk	938	482	1020
NE Corner	743	367	764
SE Corner	736	388	835
SW Corner	1205	616	1313
NW Corner	1206	595	1244
North Sidewalk between Rutgers Street and Subway Entrance	1016	497	1032
East Sidewalk between Madison Street and Monroe Street	708	374	806
West Sidewalk between Madison Street and Monroe Street	720	373	778
Pike Street and Monroe Street			
West Crosswalk	174	92	203
SW Corner	251	130	288
NW Corner	174	92	203
East Sidewalk between Monroe Street and Cherry Street	292	148	312
Pike Street and Cherry Street			
East Crosswalk	262	135	282
NE Corner	379	196	415
SE Corner	363	191	399
South Sidewalk between Pike Street and S4 Residential Entrance	368	212	412
Rutgers Street/ Frank T. Modica Way and Cherry Street			
North Crosswalk	281	161	320
East Crosswalk	963	502	1087
South Crosswalk	512	340	602
West Crosswalk	570	309	621
NE Corner	1245	666	1409
SE Corner	512	343	604
SW Corner	1083	660	1228
NW Corner	795	429	879
East Sidewalk between Monroe Street and Cherry Street	707	373	803
South Sidewalk between Frank T. Modica Way and Site 5 Entrance	1459	814	1640
South Sidewalk (east) between Frank T. Modica Way and Site 4 Residential Entrance	519	294	584
West Sidewalk between Cherry St and Monroe Street	744	408	814
Cherry Street and Jefferson Street			
South Sidewalk Between Site5 Entrance and Clinton Street	710	474	829
Cherry Street and Clinton Street			
SW Corner	430	268	495
West Sidewalk(north) between Cherry Street and Plaza Entrance	345	190	385
South Sidewalk between Plaza entrance and Clinton St	380	234	435
South Street and Clinton Street			
West Sidewalk between Cherry Street and South Street	621	328	688

Notes: Bold numbers indicate pedestrian incremental volumes are above analysis threshold of 200.

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