



FORT GREENE ASSOCIATION
HISTORIC FORT GREENE BROOKLYN

September 29, 2006

Atlantic Yards
c/o Empire State Development Corporation
633 Third Avenue
New York, N.Y. 10017

Response to the Empire State Development Corporation (ESDC) on the General Project Plan (GPP) and Draft Environmental Impact Statement (DEIS) for the Forest City Ratner (FCR) Brooklyn Atlantic Yards (BAY) Project Proposal

Summary:

The Fort Greene Association comments are set out below in four sections:

- Introduction to the FGA and our perspective.
- The FGA response to the GPP.
- The FGA response to various themes of the DEIS.
- Conclusions.

Introduction and perspective

The Fort Greene Association is the neighborhood's oldest and most broad-based civic association. We have provided an umbrella of active support for significant community developments such as the Fort Greene Park Conservancy, Fowler Square Park, Cuyler Gore Park and South Oxford Park. Our mission includes historic preservation, neighborhood and park enhancement, as well as cultural, economic and housing advancement. The Fort Greene neighborhood is generally bounded from Flatbush to Vanderbilt and Atlantic to Flushing Avenues.

We originated as the Fort Greene Landmarks Preservation Committee in the early 1970s, and in 1973 submitted our proposal for landmarks designation for the Fort Greene Historic District. We worked in conjunction with cultural organizations such as the Municipal Art Society, as well as city, state and national offices, participating in a broad, New York City-

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based, and indeed national campaign before the Bicentennial of 1976 to protect urban architectural and national treasures. New York's historical architecture, neighborhoods and economy have benefited in countless ways from these preservation efforts. The FGA has a founding tradition of awareness of the connections between city and national civic issues and challenges.

The Fort Greene Community has a long record of supporting the construction of affordable housing. Our community sponsored the construction of the large and successful College Commons Housing. We made design suggestions for the Atlantic Village, developed by the New York City Housing Partnership, and note with pleasure the many splendid gardens at Atlantic Village, and the repeated award of the Greenest Block in Brooklyn to Atlantic Village streets.

The Fort Greene Association cultivates an active relationship with Fulton Area Business, the local merchants association, as well as the Myrtle Avenue Revitalization Project. For example we worked with them in an urban tree-planting project which focused on Fulton Street and Myrtle Avenue but also provided over 200 street trees to other venues in the neighborhood.

The jewel of Fort Greene is the Olmstead and Vaux designed Fort Greene Park, and the FGA initiated and supports the Fort Greene Park Conservancy which is presently recipient of state as well as local awards to restore the park grounds and for massive restoration of the historic Fort Greene Martyr's Monument. This last work of Stanford White honors those who died on prison ships during the Revolutionary War, and will be rededicated in a ceremony of national significance in its centennial year 2008. Countless activities take place in the park which serve and bring together our diverse population.

Fort Greene is the location of the ATURA urban renewal site. Many residents of Fort Greene remember the havoc urban renewal visited upon the neighborhoods, as older troubled buildings, but many more viable historic structures were torn down leaving a wasteland for generations. In this regard we have specific experience with the proposed project developer Forest City Ratner. The Atlantic Center, one of the most badly designed malls ever was built was erected by Bruce Ratner on one of these Urban Renewal sites, and we still live with the soulless high cement walls of the Atlantic Center that back onto Fort Greene. Fort Greene residents predicted it would not be economically viable because of its design and indeed it still is financially dependent upon New York State tenants, from the Empire State Development Corporation to the NYS Motor Vehicles Division. The brick and glass closed wall of the new Atlantic Terminal built by the same developer is more of the same, a wall towards Fort Greene.

We are neighbors to Downtown Brooklyn, where the Downtown Brooklyn Plan approved through the New York City Uniform Land Use Review Procedure will soon bring high rise residential and commercial towers, further revitalizing downtown, but also bringing with it an upsurge in traffic, congestion and pollution. The FGA has always insisted that any development at the Vanderbilt Yards site should be seen in conjunction with the Downtown Brooklyn Plan.

Fort Greene is more than a local, it is also an international community, home to the Brooklyn Academy of Music, the BAM Majestic Theater, with their national and international profile in performing arts. We have an international population. Other Fort Greene arts organizations include ART New York, the Museum of Contemporary African Diaspora Arts (MOCADA), the Mark Morris Dance Company, 651 Arts and the Paul Robeson Theater, to name just a few.

We are located a walk across the Manhattan Bridge or one subway stop from Manhattan whose skyline we view from Fort Greene Park. Our proximity to Manhattan was especially clear to us on September 11, 2001, when thousands of citizens walked across the

bridge and into Fort Greene and Downtown Brooklyn to escape Lower Manhattan. We know that contemporary urban centers such as ours must see ourselves in terms of world political realities. We are not separate from them.

Though Fort Greene Association endeavors are often focused on our neighborhood, we know we are an integral part of Brooklyn and New York City as a whole and aware of the impact of issues from local to international as they affect our own urban environment. We have experience in civic enterprise, a long memory and great respect for the particular qualities and accomplishments of Fort Greene in terms of maintaining its diverse population, valuing its cultural, social and historic importance, cultivating open space, and promoting economic development. We are providing this background information to the ESDC in order to clarify the degree of experience, knowledge and commitment from which we view events in Fort Greene and the City in general and this General Project Plan and Draft Environmental Impact Statement for the Brooklyn Atlantic Yards Project proposal in particular.

General Project Plan/ Principal Goal Description /Project Purpose and Need

The Fort Greene Association rejects the General Project Plan for the Brooklyn Atlantic Yards project as it is presently proposed. We strongly support development over the Vanderbilt Rail Yards, in terms of housing, infrastructure and open space. We recognize that many Brooklyn citizens want a sports team with an arena in Brooklyn.

However, this FCR project proposal is too massive, the density will overwhelm our physical, social and cultural infrastructure, the traffic will choke the entire area and dangerously clog main arteries. The affordable housing is not guaranteed. The appropriate location for the dazzling new Frank Gehry arena is in Coney Island. Eminent domain should not be used for an arena or the profit of a private developer.

The valuable parcel of undeveloped acreage over the MTA Vanderbilt Rail Yards possesses the unique quality of being the last undeveloped large parcel of land near downtown Brooklyn close to the bridges to Manhattan, the business and cultural center of New York City. ***The particular land use, the goals and purposes of anything built on this spectacular site should not be defined by a single private developer. The DEIS evaluation of the entire project is fatally flawed, because it measures the project proposal only against itself.*** It argues that to become a vibrant mixed-use area the site needs exactly and only what the developer proposes: an arena and 16 high-rise buildings. This crucial piece of New York City land should have been bid upon in an open bidding process with various developers. The imaginations of world architects should have been involved in a competitive, knowledgeable bid with the public informed of their proposed ideas and options. This site deserves the input of the best planning imaginations we have in New York and internationally. As respected as Frank Gehry is, and appreciated among many members of the community, he is an architect and not a planner, and from the FGA viewpoint, this ensemble and the way it has been presented to the community will not result in a beneficial development for New York City or Fort Greene.

The process has not involved the local or for that matter, the wider, community. Instead, goals were formulated and decided behind closed doors with often-distant politicians and agencies, and then presented to the public as a *fait accompli*. This top-down procedure has fostered the impression that only FCR can provide the development, open space, jobs, affordable housing and arena Brooklyn wants, and only at the location and with the untenable density and with the severe consequences of unmitigateable traffic and abuse of eminent domain described in the DEIS. Blight was seen by the ESDC, neighbors saw the area in Prospect Heights developing in fine adaptive reuse of existing buildings and influx of residents.

The neighborhood is now experiencing “developer’s blight”, buildings bought by the developer and left empty, others precipitously torn down.

Alternative proposals to the project proposal do exist, thanks to the determined efforts of the community, but they were not seriously considered by the DEIS because of this same circuitous reasoning, that only the developer’s proposal matches the developer’s proposal, which is deemed the correct one. The Regional Plan Association agrees that there are egregious problems with this proposal, but says it is too late to go back to square one. The FGA disagrees. We have to look at the long-term perspective, with our knowledge of the history of our community and our experience; it is our responsibility to do so, knowing this site development will be here for generations. We would like to quote from the position paper of The Regional Plan Association released in August 2006:

Unfortunately, the public review process for the Atlantic Yards project is part of a pattern in which the State and the City enter into an agreement with a single developer prior to a full debate of alternatives. Ideally, this strategically vital piece of public real estate would have been the subject of a planning exercise open bidding.....

Instead, the state worked exclusively with Forest City Ratner while the MTA entered into a truncated bidding process only after a memorandum of understanding had been signed by FCRC, the state and the city. The details of the project were largely devised behind closed doors by the developer, and only minor modifications have been made in response to public criticisms. While the developer has held numerous public meetings and provided information to the community, most of the decisions regarding the site had already been made. As a result, the public has no way of knowing if this project is the best possible one for the site. It is greatly handicapped in assessing potential alternatives, and has less leverage for negotiating changes that would add to its community benefits.

The Topics of the Draft Environmental Impact Statement

The FGA will now make a series of observations of the GPP and the DEIS based on our sense of civic involvement both as citizens of New York, Brooklyn, and Fort Greene. Most issues actually affect all New Yorkers, some just Fort Greene. Though we will treat them thematically, these points refer to specific tasks and responses in the DEIS which we find inadequate and will cite the task number at the end of the respective paragraph.

Density: We acknowledge that New York City needs to increase housing at all levels for expected population growth, and make office space available to accommodate new jobs and increase tax bases. That does not mean this or any other project should be built at this density—the most dense in north America—twice as dense as any location in Manhattan. Such density will overburden the social, structural and cultural resources of the neighborhood, be unlivable and not positively contribute to life in New York City. [Task 1].

Affordable Housing: Because the Fort Greene Association vociferously supports affordable housing, we find the GPP and DEIS proposals on affordable housing and its financing and phasing inadequate. The affordable housing is not affordable enough to a broad segment of Brooklyn’s residents. The income levels must be changed to accommodate more lower income residents. As the need is so great the affordable housing should be built at the outset. According to the phasing plan for the project, most of the affordable housing will be built in the second phase. Since the second is dependent upon the financial success of the first phase, which is not guaranteed, the affordable housing is not guaranteed. This is not acceptable. [Tasks 1 and 2] Even if the affordable housing is built, its effect will be to create an enormously different income distribution favoring the wealthier, than that which we have and have had historically in Fort Greene, known for a diverse blend of incomes and populations which extends back into the 19th Century. This combination has been unique in New York City. Destroying this balance is unacceptable. [Task 4].

Subsidies: Government funding for affordable housing is limited and should be used in the most cost effective way possible. Taxpayers should not allocate giant subsidies to FCR for creating affordable housing that could be built more efficiently and effectively if the same subsidies were made available to other developers, or to the experienced agencies already active in the neighborhoods such as the Fifth Avenue Committee and the Pratt Area Community Council, and who would also deliver it sooner. [Task 4]

The developer's profits and additional hidden costs which will be born by the taxpayer need to be more fully revealed than they are in the DEIS. A 20-year profit and loss statement has not been issued. Additional costs will be demanded of the taxpayer in the future when the infrastructure issues that are left unaddressed arise, like the need for schools/classrooms, firehouses, police stations, hospitals for 15,000 new residents. These issues are not included in the GPP [Task 4 and Task 5].

Services: There is no information on who will run and fund the community facilities. A daycare center for 100 children will not make a dent in the needs for this in a new population of over 15,000 people. How will existing fire departments handle high-rise buildings? How can police and fire or ambulance respond in the gridlock of the proposed arena? [Task 5]

Job creation: In terms of labor, the Extell proposal would have specified union labor, and there could have been more job creation proposals if there had been open bidding on this project. To speak as if the FCR development is the only possibility for the creation of construction jobs in Brooklyn is to try to skew popular opinion and manipulate the public. People anxious for work are left with the impression that this FCR development is their only chance for a job, and that opposing this project means opposing development. This is not true. And this public relations campaign has polarized Brooklyn. It cynically takes the genuine needs and interests of people and distorts the truths about how they can be fulfilled. The FGA supports the creation of sustainable jobs through projects that benefit the individuals, the community and the city. [Task 4].

Arena/Eminent Domain: New York State should not propose eminent domain, which undermines the right to private property and is abjured by 90% of the US population, in order to build an arena, which is not for the greater good of all citizens. And why does the developer insist on building an arena in the congestion of Flatbush and Atlantic in Brooklyn, when Coney Island is an excellent place for an arena? An arena can be built without this use of eminent domain on Coney Island, which was the site originally envisioned for a Brooklyn arena. A stunning new arena would help rebuild Coney Island into the recreation center of its glory days. Coney Island would be easier to access for New Jersey fans. Its subway station is newly renovated, and as a terminus, it is more suited to handling crowds after and before an event than a hub, which Atlantic Avenue is. This location would spare Downtown Brooklyn unmitigatable traffic, congestion, and pollution. [Tasks 1,2, 4]

Public Safety/Terrorism: The traffic issue is not just a Brooklyn issue, as we are so close to the bridges to downtown Manhattan; it blends into a citywide and larger urban issue in the days since 2001. *Atlantic Avenue is a designated New York City evacuation route.* How can we put the City in danger with blocked thoroughfares caused by this bad choice of placing an arena at this location? Imagine what an evacuation of Manhattan and Brooklyn would look like along the traffic corridors which could result from this project if implemented as proposed.

And as we consider the implications of our current world situation as it affects our interests in this development, is a center like this not a terrorist target? A glass-enclosed arena with residential towers in closer proximity than the city zoning would allow? At Atlantic Avenue Station, where a terrorist attack was already planned? Above and beyond this, is not the densest location in the entire United States a target in itself? These issues are left out of the GPP and the DEIS, and call for a supplemental DEIS. [Omitted from DEIS]

Community Involvement: No project at this site can work that does not go through the city's ULURP review procedure. It is unconscionable that the political elected leaders in the districts have not been able to vote on the proposal, that the communities have not been more directly involved through the community boards, that the City commissions and Council have not closely accompanied the process of evaluating the largest single source development ever proposed for New York City.

Project Design: The particular design of the project places the tallest buildings along Atlantic Avenue, creating a veritable wall separating Fort Greene from Prospect Heights and Park Slope. Fort Greene does not want these gigantic rampart walls on Atlantic Avenue. We know too well that this developer has walled off Fort Greene in the past on Hanson Place with the concrete walls of Atlantic Center and the masonry walls of Atlantic Terminal Mall. Hanson Place in Fort Greene is a pedestrian thoroughfare because of the LIRR and the subway entrances at Atlantic Avenue. With sensitive development, Hanson Place could have had a vital, vibrant street life, and instead it is a closed and cold one. [Task 1].

Wind: Hanson Place is already a wind tunnel, particularly severe in the winter. Yet there have been no wind studies of the effects of these structures in the DEIS. A supplemental DEIS must address this issue. [Wind studies omitted from DEIS]

Shadows: The proposed rampart like walls along Atlantic Avenue at the southern border of Fort Greene will be formidable, and cast unmitigatable shadows across Fort Greene's residences and open space, the most severe ones closest to Atlantic Avenue, but reaching far into Fort Greene all the way to Fort Greene Park. They will affect everything from energy bills in the winter when less sunlight means colder homes, to the deprivation of solar power right for the future, to the health of the parks, like South Oxford Park, which will be in darkness for much of the winter day. Public sidewalks are not included in the analysis, and walking in the shadows is a very different experience from being in the sunlight in winter and it will surely affect the quality of life in Fort Greene. Shadows will affect the growth of street trees, which are important not only for their ambiance but also for air quality. The playground and homes of Atlantic Terminal houses as well as other venues on Atlantic Avenue, will be in virtually permanent shadow [Task 9] The shadows on Fort Greene Park will impinge upon the an already stressed park. This shadowing of Fort Greene is totally unacceptable to the Fort Greene Association.

Open Space: In Fort Greene we currently have much less than the New York City recommend ratio of open space to residents. After the project is built, if the open space is ever completed, our open space ratio per resident will actually decrease, because of the enormous increase in population. This is not acceptable. We also object to the fact that the open space is not true open space. It should be a genuine public park. Also, the massive increase in population density and the concomitant increase in pets will overwhelm Fort Greene Park. The effect of the use of so many new residents on Fort Greene Park needs to be more fully considered. [Open Space]

Neighborhood Character and Cultural Resources: All of the above remarks involved neighborhood character, but we have more issues to include. The DEIS treats Fort Greene as if it only had a northern border, and says the historic districts won't be affected. However, it needs to look at our southern border also. There is a line of communication down South Portland Avenue which leads to 6th Avenue and one down Carlton Avenue, that connect us to Prospect Heights and Park Slope. Prospect Heights at the designated development site was filled with adaptively re-used buildings and the neighborhood was welcoming and compatible in character with the qualities of Fort Greene. These created connections between neighborhoods.

Before the wall of buildings planned for Phase II is constructed, the separation of Fort Greene from Prospect Heights and Park Slope will begin with Phase I of the construction, when buildings are torn down and an inhospitable staging area or parking lot will be constructed for years separating us from Prospect Heights and Park Slope. There is no guarantee that Phase II, the residential towers, will be built, and we could be left with torn down buildings and a parking lot. The loss of so many buildings in Prospect Heights, including the historic Ward Bakery, the LIRR stables is not acceptable to the Fort Greene Association. Finally, the widening of Atlantic Avenue and Flatbush Avenue will make them formidably difficult for pedestrians to cross.

Another important impact on Fort Greene neighborhood character will be the traffic, noise and pollution generated by vehicles looking for parking places on local streets. This will disrupt the neighborhood 250 times a year times two, 500 times a year. [Tasks 12, 13, 14, 15]

Conclusions:

The Fort Greene Association strongly supports appropriate and architecturally exciting development of mixed-use housing and commercial space, as well as of infrastructure and open space, over the Vanderbilt Rail Yards. We recognize that many citizens want a sports team with an arena in Brooklyn, and Coney Island is the right location for a dazzling, contemporary arena.

However, the FCR proposed project is too massive, the density will overwhelm our physical, social and cultural infrastructure, and traffic will choke the entire area and dangerously clog main arteries. Eminent domain should not be used for the profits of a private developer. The shadowing of Fort Greene and the walling off of Atlantic Avenue are unacceptable, as are the loss of historic structures. Needed, affordable housing is not guaranteed. The proposed open space is not public.

The alternative proposals have not been seriously considered in the DEIS. Important factors such as wind tunnels, the vulnerability of the site to terrorism, and its relationship to the Downtown Brooklyn Plan and its effects, have not been considered in the DEIS. Therefore, the DEIS is inadequate and needs to be supplemented. We reject the definition of blight used by the ESDC, as the Prospect Heights neighborhood was prospering. The subsidies planned for FCR are a bad investment for taxpayers.

Where the developer and the ESDC believe the gains of this project proposal justify the losses, the Fort Greene Association states that the losses don't justify the gains of this project. The Fort Greene Association rejects the General Project Plan for the Brooklyn Atlantic Yards project as it is presently proposed.

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