27.0 Response to Comments on the DEIS

Introduction

This document summarizes and responds to substantive comments received on the Draft Environmental Impact Statement (DEIS) for the Proposed Actions made during the public comment period. These consist of comments made at the DEIS public hearing held by the New York City Planning Commission (CPC) and written comments submitted to the New York City Department of City Planning (DCP) through the channels established to receive comments on the DEIS and included in the Notice of Public Hearing on the DEIS, consistent with the standard practice of the department. The Notice of Completion for the DEIS was issued on October 11, 2024. The public hearing for the DEIS was held concurrently with the hearing on the Proposed Actions' Uniform Land Use Review Procedure (ULURP) application at the Public Hearing Room, Lower Concourse, 120 Broadway, New York, NY 10271, on February 5, 2025, at 10:00 AM. The DEIS public hearing was held in-person and remote through the NYC Engage portal to allow for broad public participation. The comment period for the DEIS remained open until 5:00 PM, February 18, 2025.

The section below lists the organizations and individuals that submitted comments on the DEIS and the following section summarizes relevant comments and provides a response to each. Comments that are closely related or like other comments are grouped together, and a single response is provided. Although verbatim language from the comments is not typically provided, all comments reflect, as accurately as possible, the original comment(s).

Appendix I contains all written comments, as well as a transcript of the oral testimony received during the DEIS public hearing. All substantive comments were assigned a code, and the names of the commenters and the comment numbers are provided after each comment. Comments are coded by last name and identified in brackets at the end of each comment. For example, comments from John Doe would be coded "Doe-1, Doe-2," etc.

List of Organizations and Individuals that Commented on the Draft Scope of Work

Commenters whose substantive comments are addressed herein are listed below, organized alphabetically by last name.

Elected Officials, Government Agencies, and Community Boards

- Hudson, Crystal, New York City Council Member for 35th District, 02/05/2025, oral testimony
- Ossé, Chi, New York City Council Member for 36th District, 02/05/2025, oral testimony; 02/06/2025, written comment (e-mail)
- Henley, Dash, City Planner, NYC Department of Transportation, 02/05/2025, oral testimony
- Wedderburn, Sharon, Chair of Brooklyn Community Board 8 Housing & Land Use Committee, 02/05/2025, oral testimony

- Witherwax, Robert, Chair of Brooklyn Community Board 8 Environmental Sanitation and Transportation Committees, 02/05/2025, oral testimony

Organizations

- DeCerbo, Maddie, Senior Urban Planner, Real Estate Board of New York, 02/05/2025, written testimony
- Lau, Brenda, on behalf of Brian Coleman, Greenpoint Manufacturing and Design Center (GMDC), 02/05/2025, oral testimony; 02/05/2025, written comment via Brian Coleman (e-mail)
- Morano, Alex, Transportation Alternatives Brooklyn Activist Committee (TABK), 02/05/2025, written testimony (e-mail)
- Veconi, Gib, Chair, Prospect Heights Neighborhood Development Council, 02/05/2025, oral testimony
- Williams, Kari, Westbrook Memorial Garden, 02/05/2025, oral testimony
- Young, Paula, Westbrook Memorial Garden, 02/05/2025, written testimony

Interested Public

- Alvarez, Antonio, 02/05/2025, oral testimony
- Backus, Jessica, 02/18/2025, written testimony (e-mail)
- Hyde, Toby, 02/05/2025, oral testimony
- Irons, Lana, 02/09/2025, written testimony (e-mail)
- Maza, Alex, 02/05/2025, oral testimony
- Medjuck, Avery, 02/18/2025, written testimony (e-mail)
- Leamon, Corey, 02/05/2025, written testimony (e-mail)
- Selditz, Inessah, 02/05/2025, written testimony (e-mail)

Comments and Responses on the DEIS

1. Project Description

Comment 1-1: This plan is part of a broader need for reforms that allow for more housing construction including affordable housing. I want to offer my endorsement on the rezoning and urge the Commission to greenlight these changes. We need more housing in the City, and the current stretch along Atlantic Avenue is a wasteland. This rezoning is long overdue.

[Irons-01, Maza-04, Alvarez-03, Witherwax-05, Backus-01]

Response 1-1: Comment noted. The Atlantic Avenue Mixed-Use Plan (AAMUP) is an area-wide plan to support housing including affordable housing and job growth along the Atlantic Avenue corridor. The Proposed Actions seek to foster a vibrant mixed-use neighborhood with active ground floor uses, and implement community-identified priorities for housing, services, and job growth, and reinforce proposed investments into community amenities and streetscape.

Comment 1-2: The community has been clear that the Atlantic Avenue Mixed-Use Plan (AAMUP) must go beyond the Mandatory Inclusionary Housing (MIH) requirements, increasing the supply of deeply affordable housing through both new construction and stronger preservation investments. We can do that by leveraging every potential city-owned site in the area, including the Department of Education sites at 457 Nostrand and 510 Claremont Avenue.

[Hudson-01, Ossé-01]

Response 1-2: Comment noted. In addition to the affordable units created through MIH on privately-owned sites, approval of the Proposed Actions would facilitate the development of five city-owned/non-profit-owned sites (Dean Park Edge, Bergen Green, 457 Nostrand Avenue, 1134 Pacific Street, and 1110 Atlantic Avenue). In total, construction on these five sites could create approximately 781 affordable rental units, of which 151 would be for seniors.

Comment 1-3: REBNY supports AAMUP, which seeks to rezone 21 blocks in Crown Heights and Bedford-Stuyvesant.

[DeCerbo-01]

Response 1-3: Comment noted.

Comment 1-4: These changes are crucial for boosting housing development in a prime Brooklyn area and advancing the City's efforts to address the housing crisis, following the recent passage of City of Yes for Housing Opportunity.

[DeCerbo-02, Alvarez-01, Williams-03]

Response 1-4: Comment noted.

Comment 1-5: With the recent passage of City of Yes for Housing Opportunity, it's now possible to map MIH Option 3 alone in a residential rezoning, we strongly believe MIH Options 1 and 2 should be dropped from the application in order to provide the greatest number of deeply affordable units in the rezoned area.

[Veconi-01]

Response 1-5: Comment noted. The affordability levels for MIH have yet to be determined, but Options 1, 2, and 3 would provide options for low- and moderate-income households. For a conservative analysis, Options 1, 2 and 3 were studied in the FEIS.

Comment 1-6: We support an incentive for creating open space in the Special Atlantic Avenue Mixed-Use District, but any such spaces created must be at least maintained and preferably owned by the Department of Parks and Recreation (DPR). Property owners that receive such an incentive must also provide funding for maintenance through an annual property tax assessment payable to DPR.

[Veconi-06]

Response 1-6: Comment noted. As discussed in **Chapter 25, Conceptual Analysis** of the **FEIS,** to create opportunities for passive publicly accessible open space, the Atlantic Avenue Mixed-Use Special District would include a City Planning Commission (CPC) Authorization to allow development in R9 equivalent districts to access the floor area bonus for public plazas in the New York City Zoning Resolution (ZR), pursuant to ZR section 37-70 which includes maintenance and operational requirements.

Comment 1-7: I think we should go even further, I think we need to have more density, as much density as we can in the proposed area. The housing crisis demands bold action, and we cannot afford to miss opportunities to build as much housing as possible in well-connected, transit-rich areas like this one.

[Maza-03]

Response 1-7: Comment noted. The zoning strategy developed for AAMUP was a collaborative effort with local residents and other stakeholders. The Proposed Zoning seeks to balance increased density to facilitate well-needed housing while being responsive to local context and urban design considerations.

Comment 1-8: There's a lot of confusion and fear specifically about the details of the rezoning and densities, and specifically shifting to higher density models in like R9A. I know not all properties are being suggested to be driven up to R9A. However, the idea of development impacting the local neighborhood in an environmental aspect and in sort of a day-to-day life aspect is pretty important.

[Williams-01]

Response 1-8: Comment noted. Chapter 1, "Project Description" of the EIS includes detailed description and graphics of the proposed land use actions, including rezoning districts and boundaries. The Final Environmental Impact Statement (FEIS) was prepared for the Proposed Actions pursuant to the methodologies and

guidance of the 2021 *CEQR Technical Manual* and in accordance with the Final Scope of Work prepared for this application. Analysis of potential impacts caused by increased density are examined in Chapters 2 through 19 of this FEIS.

Comment 1-9: One of the tent poles of AAMUP and M-CROWN as Community Board 8 has dealt with this proposal for the past 10 years has been a cross subsidy to keep the light manufacturing uses that currently existing in this space under the M1-1 zoning, to keep them viable, even as we move the area into a more residential framework. Items 2 and 3 on our comments on AAMUP [CB 8 recommendation] really go to that. We want to refer you to the Gowanus mix that was approved in the recent years as a model that we think is applicable to these spaces.

[Witherwax-01]

Response 1-9: Comment noted. The goal of the AAMUP Special District is to leverage market trends and facilitate a mix of both housing and jobs using existing and new incentive zoning tools. Because zoning changes need to work across generations, DCP proposed zoning balances the goals of a mixed-use neighborhood and job growth, while maintaining long-term flexibility to respond to local and regional changes in the economy. These zoning changes include requiring non-residential ground floor uses along major corridors, creating a new preferential incentive that gives a boost to non-residential uses along side streets, and a new industrial-residential mixed-use CPC Chairperson Certification to ensure these uses can be combined safely and effectively when proposing an alternate means of compliance with ZR 146-11.

Comment 1-10: I urge the CPC to approve the rezoning and redevelopment of Atlantic Ave. This underutilized, unsafe corridor holds immense potential to become a vibrant, green, and equitable district. With bold, visionary planning, NYC can lead the way in urban innovation – transforming Atlantic Ave. into a thriving mixed-use hub with much-needed affordable and mid-tier housing. The demand is clear, and the moment is now to set a global example of thoughtful, future-forward development that meets the needs of 21st-century citizens.

[Selditz-01]

Response 1-10: Comment noted. See **Response 1-1.**

Comment 1-11: I urge the Commission to approve the Atlantic Avenue Mixed-Use Plan solely to the extent the Plan is amended – consistent with the conditions adopted by Community Board 3 – to ensure the preservation of Lefferts Place Community Garden.

[Medjuck-01]

Response 1-11: Comment noted. Refer to **Response 20-1**, below.

2. Land Use, Zoning, and Public Policy

Comment 2-1: We must strengthen mixed-use zoning to support local businesses, the arts, and community spaces. AAMUP aims to create a diverse and vibrant mix of uses, including jobs, essential services, local retail, such as grocery stores, community facilities, creative and cultural spaces, and light industrial businesses. However, unlike the nearby Special Gowanus Mixed-Use District, AAMUP currently lacks the tools needed to ensure these outcomes. We should consider modifying the proposed Special Mixed-Use incentive to more narrowly focus on these key uses for all or part of this corridor, and we must secure funding for more programming and investments to provide light manufacturing, training, and business development for prospective tenants and local residents who need training to work at these new businesses.

[Hudson-05, Witherwax-01]

Response 2-1: Comment noted. The goal of the AAMUP Special District is to leverage market trends and facilitate a mix of both housing and jobs using existing and new incentive zoning tools. Because zoning changes need to work across generations, DCP proposed zoning balances the goals of a mixed-use neighborhood and job growth, while maintaining long-term flexibility to respond to local and regional changes in the economy. These zoning changes include requiring non-residential ground floor uses along major corridors, creating a new preferential incentive that gives a boost to non-residential uses along side streets, and a new industrial-residential mixed-use CPC Chairperson Certification to ensure these uses can be combined safely and effectively when proposing an alternate means of compliance with ZR 146-11.

Additionally, throughout the AAMUP planning process, DCP in coordination with SBS and the Mayor's Office of Workforce Development, targeted programs to further expand job growth, business expansion, and workforce development for this area, and we are evaluating the potential for enhancing economic development services at the City-owned armory along Bedford and Atlantic Avenues. Further coordination and development of specific programs and SBS funding opportunities are beyond the scope of this environmental review.

Comment 2-2: The proposed R7D zoning along Dean and Bergen Streets in Prospect Heights is not a strong fit with the surrounding context, permitting height even greater than the Newswalk Building at 535 Dean Street and the Peter F. Riley Storage Warehouse at 491 Bergen Street.

[Veconi-03]

Response 2-2: Comment noted. Refer to **Chapter 2, Land Use, Zoning, and Public Policy** of the **FEIS**. The Proposed Actions would bring into conformance existing residential uses and create a zoning framework to provide new, permanently affordable housing on public sites as well as facilitate a mix of market-rate and affordable housing on private sites in one of the City's fastest growing areas.

Comment 2-3: We support the creation of affordable housing for families and seniors on the HPD sites, located at 542 Dean Street and 516 Bergen Street, and are supportive of increasing density on those lots to R7D.

[Veconi-04]

Response 2-3: Comment noted. As shown in **Figure 2-9** in **Chapter 2, Land Use, Zoning, and Public Policy** of the **FEIS**, the sites described above would be zoned R7D under the Proposed Actions to maximize the amount of affordable housing generated on city-owned land.

Comment 2-4: We also support R7D zoning for other lots in the rezoning area if they were developed as 100% affordable housing, but all other lots should be zoned R6A.

[Veconi-05]

Response 2-4: Comment noted. See **Response 1-8**.

Comment 2-5: I want to make a really important point about the plan itself and the decreasing steps of density. For future land use actions there should be a priority to get rid of this practice. There's no reason to put new multi-family buildings on major thoroughfares. Increased density should be permitted on streets like Bergen, Dean, and Prospect. The whole area off of Atlantic should be R7D.

[Hyde-01]

Response 2-5: Comment noted. As shown in **Figure 2-9** in **Chapter 2, Land Use, Zoning, and Public Policy** of the **FEIS**, while the highest densities would be mapped along Atlantic Avenue, due its 120-foot-width and greater access to light and air, while several side streets would be mapped with a more moderate density less than or equal to R7D, combined with a mid-block non-residential use incentive, in recognition of the side streets being a narrower width of 70 feet.

3. Socioeconomic Conditions

No comments related to this technical area were made.

4. Community Facilities and Services

No comments related to this technical area were made.

5. Open Space

Comment 5-1: There are numerous parks and playgrounds in the community that are also in need of improvements like Lowry Triangle, Underhill Plaza, Dean Playground, James Forten Playground that will see increased use amid a large influx of new residents.

[Hudson-04]

Response 5-1: **Comment noted.** As described in **Chapter 5, Open Space** of the **FEIS,** approval of the Proposed Actions is expected to reduce the non-residential study area's passive open space ratio approximately 13.6 percent. The residential study area's total, active, and passive open space ratios would decrease by 6.29 percent, which would constitute a significant adverse impact. **Chapter 20, Mitigation** of the **FEIS,** explores mitigation strategies, including partial mitigation measures, such as improving existing open spaces and creating mechanisms for private property owners to create publicly accessible open spaces in the future which would serve to partially meet the new demand introduced as a result of the Proposed Actions. As noted in **Chapter 20, Mitigation** of the **FEIS**, Lowry Triangle and Underhill Plaza are currently undergoing renovations to improve the quality of their facilities.

Comment 5-2: I asked the Administration to invest through AAMUP in our district's green and open spaces, including the Lefferts Place and Westbrook Memorial Community Gardens, Hancock and Potomac Playgrounds, and the Schoolyards for P.S. 3 and P.S. 93. I ask that the Administration considers bringing in more resources and infrastructure improvements to these spaces.

[Ossé-03]

Response 5-2: Comment noted. Refer to Response 5-1.

Comment 5-3: Atlantic Avenue is 120 feet wide throughout almost all of the project zone. Over 80% of this public land is dedicated to moving or storing vehicles, 18% for pedestrians, 0% for buses, and 0% for cyclists. The Avenue's car and parking lanes stretch 94 feet, which could fit an eight-lane highway. As noted in Councilmember Hudson's Community Vision and Priorities report, the Project Area lacks public open space, green, and recreational space, and those existing spaces are in dire need of revitalization. Some parts of the Project Area fall outside the DPR's "walk to a park" zone, meaning they are more than a 5–10-minute walk away from open or green space. New public spaces and revitalization of existing spaces are greatly needed.

[Morano-02]

Response 5-3: Comment noted. Refer to **Response 5-1**.

Comment 5-4: There is also an opportunity for additional green space for our community at the empty lot (Block 1205; Lot 11 – 1134 Pacific Street), adjacent to a proposed new housing development on Lot 14.

[Young-02]

Response 5-4: Comment noted. For analysis purposes, under the Proposed Actions, it is assumed that this lot would be redeveloped as part of Projected Development Site 48. Please refer to **Appendix A – Reasonable Worst Case Development Scenario (RWCDS) Tables** of the **FEIS**. For analysis purposes, it is assumed that by 2034, Projected Development Site 48 (Block 1205, Lots 11, 14, and 111) would be redeveloped with an 11-story residential building containing 111 affordable units. For this environmental analysis, development was assumed on all three lots, and public open space was not assumed in the RWCDS. Refer to **Response 1-2**.

6. Shadows

Comment 6-1: I would kindly request that as part of the EIS, that shade studies be done with any proposed development on the 1200 Block. Development from the project would largely impact our space (Westbrook Memorial Community Garden).

[Williams-02]

Response 6-1: An analysis of incremental shadows was conducted pursuant to the guidance of the 2021 *CEQR Technical Manual* and is included in **Chapter 6, Shadows,** of the **FEIS**.

Westbrook Memorial Community Garden is analyzed in **Chapter 6, Shadows** of the **FEIS.** Refer to **Table 6-4**. Incremental shadow would be cast on this sunlight-sensitive resource on two representative analysis days, May 6/August 6 and June 21, for 49 minutes and 2 hours and 6 minutes, respectively, in the afternoon hours. Based on the analysis presented in **Chapter 6, Shadows** of the **FEIS,** this incremental shadow would not constitute a significant adverse impact based on the guidance of the *CEQR Technical Manual*.

Comment 6-2: Westbrook Memorial Community Garden is a Brooklyn Queens Land Trust (BQLT) community garden located at 1233 Pacific Street (Block 1200; Lot 70) and would be impacted by development on Atlantic Avenue on Lots 5, 16, 27. The Pacific Street side is zoned as R6A, and the Atlantic Avenue side is currently zoned M1-1 and R6A. We are a thriving community garden with approximately 90 members, and the green space is home to a large pollinator garden with over 60 perennials and native plantings. The community space also has raised garden beds and grow pots with over 40 neighbors growing food and is a local gathering spot for community events. I would to kindly request that shade studies be done with any proposed development on the block, and to have the community garden in mind.

[Young-01]

Response 6-2: Comment noted. Refer to **Response 6-1**.

Comment 6-3: Throughout AAMUP's planning process, community members – including Community Board 3 and the Lefferts Place Block Association – have consistently engaged with DCP and elected community leaders to express concerns about the impact of AAMUP on the portion of Lefferts Place between Classon Avenue and Franklin Avenue. At the Commission's Review Session

on October 15, 2024, Commissioner Benjamin specifically asked DCP to consider ways to mitigate the impact of AAMUP on Lefferts Place. DCP has made no material changes to the Plan in response to this engagement, despite repeat assurance, across years, that it would "think about" the concerns raised by the community.

The impact of AAMUP on Lefferts Place will be felt most acutely by the garden which has existed for 40 years. Per **Chapter 6, Shadows,** AAMUP will cause 100 percent of the garden to be covered in incremental shadow generated by the Proposed Actions for significant periods during the growing season. AAMUP will kill the garden.

[Medjuck-02]

Response 6-3: Comment noted. As discussed in **Chapter 6, Shadows** of the **FEIS,** incremental shadow generated by the Proposed Actions would be cast on the Lefferts Place Block Association Community Garden on each of the four representative analysis days ranging between four hours and 20 minutes (June 21) and 7 hours 11 minutes (March 21/September 21), resulting in potential for significant adverse impact. As discussed in **Chapter 20, Mitigation** of the **FEIS,** mitigation measures were explored pursuant to the guidance of the CEQR Technical Manual. **Chapter 21, Alternatives** of the **FEIS** explores potential alternatives to the Proposed Actions that could reduce or eliminate the potential for significant adverse impacts. However, as noted in the alternatives analysis, both the No-Action Alternative and the No Unmitigated Significant Adverse Impacts Alternative would not meet the principal goals and objectives of AAMUP.

7. Historic and Cultural Resources

No comments related to this technical area were made.

8. Urban Design

No comments related to this technical area were made.

9. Hazardous Materials

No comments related to this technical area were made.

10. Water and Sewer Infrastructure

No comments related to this technical area were made.

11. Solid Waste and Sanitation Services

Comment 11-1: I urge the Administration to invest into supplemental cleaning services through the Department of Sanitation and to invest in social services through DHS and Phoenix House along the Franklin Avenue corridor.

[Ossé-06]

Response 11-1: Comment noted. Based on the analysis presented in **Chapter 11, Solid Waste and Sanitation** of the **FEIS**, development occurring as a result of the Proposed Actions would not result in significant adverse impacts to solid waste and sanitation services. Provision of social services is beyond the scope of this environmental review.***12. Energy***

No comments related to this technical area were made.

13. Transportation

Comment 13-1: We must secure a fully funded commitment for a comprehensive redesign of Atlantic Avenue, one of the most dangerous corridors in the entire borough. We have a once in a generation opportunity to make Atlantic Avenue safer for all road users. This commitment should include a clear timeline for establishing and finalizing the redesign scope, including a public engagement process and a clear commitment that would fund the project scope. We cannot add thousands of residential units to Atlantic Avenue without ensuring those new residents have a safe street to live on without improving the streets as well.

[Hudson-03, Ossé-08, Morano-01]

Response 13-1: Comment noted. **Chapter 13, Transportation** of the **FEIS** includes an assessment of street user safety, and evaluates the potential for impacts to traffic, pedestrians and transit. **Chapter 20 Mitigation** of the **FEIS** identifies potential mitigation strategies that could be implemented in coordination with DOT. A comprehensive redesign of Atlantic Avenue is beyond the scope of this environmental analysis.

Comment 13-2: Atlantic Avenue is one of the most dangerous streets in the city, primarily serving the needs of people cutting through the corridor rather than the people who live on or near it. To create a holistic plan for Atlantic Avenue, it is essential to center street safety for all. The plan should prioritize creating essential public resources, like green space, fast and reliable transit networks, public open space, and safe cycling infrastructure, while addressing the harm caused by the car-centric planning practices of the 20th century.

Atlantic Avenue has been unsafe for all road users for decades. Between 2016-2020, there have been two pedestrian fatalities at the intersection of Atlantic Avenue and Bedford Avenue. In the same five-year period, there have been 569 traffic-related injuries along the one-mile stretch of Atlantic Avenue through the Project Area including 31 severe injuries (12 pedestrians, 8 bicyclists, and 11 motorists).

Between 2021 and the end of 2024, additional fatalities and injuries on Atlantic Avenue within the project zone include: four fatalities, 473 total injuries, and 931 total crashes, averaging approximately four crashes per week.

[Morano-01]

Response 13-2: Comment noted. Refer to **Response 13-1**. A vehicular and pedestrian safety evaluation is provided in **Chapter 13, Transportation** of the **FEIS**. As noted in **Response 13-1**, a comprehensive redesign of Atlantic Avenue is beyond the scope of this environmental analysis, but is a high-priority corridor for DOT.

Comment 13-3: I want to emphasize the extremely slow bus times coming across Atlantic Avenue today and make sure that we are prioritizing bus riders in that redesign, as Atlantic Avenue is currently an enormous barrier between the neighborhoods.

[Hyde-02, Maza-03]

Response 13-3: Comment noted. Refer to **Response 13-1**.

14. Air Quality

No comments related to this technical area were made.

15. Greenhouse Gas Emissions and Climate Change

Comment 15-1: The concentrated vehicle traffic through this corridor, combined with a design that prioritizes traffic, creates harmful externalities for everyone in the surrounding neighborhoods in addition to the over harm caused by crashes. Notably:

- Asthma hospitalizations in this area are 2x higher than the citywide average.
- The lack of permeable surfaces led to 12+ inches of flooding reported during Hurricane Ida in 2021.
- The community districts here rate high on the Climate Change Vulnerability Index.

[Morano-03]

Response 15-1: Comment noted. The analyses presented in **Chapter 10, Water and Sewer Infrastructure,** and **Chapter 15, Greenhouse Gas Emissions and Climate Change,** and **Chapter 17, Public Health** of the **FEIS,** prepared in accordance with the guidance of the 2021 *CEQR Technical Manual* determined that the Proposed Actions would not result in any significant adverse impacts to water and sewer infrastructure or greenhouse gas emissions or climate change.

16. Noise

No comments related to this technical area were made.

17. Public Health

No comments related to this technical area were made.

18. Neighborhood Character

No comments related to this technical area were made.

19. Construction

No comments related to this technical area were made.

20. Mitigation

Comment 20-1: I hear and understand the concerns brought to me by the Lefferts Place Block Association and the impacts of shadows on their community garden. I hope to work with the Administration on this issue and look to consider solutions to mitigate this impact.

[Ossé-04, Backus-03]

Response 20-1: Comment noted. See **Response 6-3.** As presented in **Chapter 6, Shadows** of the **FEIS**, incremental shadow cast by development facilitated by the Proposed Actions would be cast on the Lefferts Place Block Association Garden each of the four representative analysis days ranging between four hours and 20 minutes (June 21) and seven hours 11 minutes (March 21/September 21). As discussed in **Chapter 20, Mitigation** of the **FEIS,** no feasible mitigation measures have been identified for the Lefferts Place Block Association Garden and therefore this impact would be an unavoidable significant adverse impact.

Comment 20-2: DCP's lack of a viable solution to preserve the Lefferts Place Block Association Community Garden is especially alarming that, per Chapter 5, Open Space, of the DEIS, the Proposed Actions will reduce the open space ratio (acres per 1,000 residents) by approximately 6.29% by 2034. At the Commission's October 15, 2024, Review Session, Commissioner Osorio urged DCP to find ways to mitigate AAMUP's effect of open space in an area with minimal access to parks. Council Member Ossé echoed that plea during their testimony to the Commission on February 5, 2025. DCP has failed to alter the plan in any way in response to these concerns.

[Medjuck-03]

Response 20-2: Comment noted. As discussed in **Chapter 25, Conceptual Analysis** of the **FEIS,** as part of the Proposed Actions, a zoning text amendment is proposed that would create a zoning authorization allowing for the bonus of floor area and height modification with the provision of publicly accessible open space on zoning lots zoned R9 larger than 25,000 square feet (sf).

Though these potential mitigation measures may increase publicly accessible open space in the residential ½-mile Study Area, opportunities to create new open space in sufficient amounts to fully mitigate an indirect impact (approximately three acres) are limited.

Comment 20-3: The implicit suggestion that the destruction of Lefferts Place Community Garden is simply a necessary cost is hard to swallow given DCP's avowed commitment to mitigating the impact of AAMUP on Lefferts Place, especially given that AAMUP inexplicably does not call for any upzoning on the north side of Atlantic Avenue west of Classon, i.e., south of the wealthier blocks on Lefferts Place that are part of Community District 2.

[Medjuck-04]

Response 20-3: Comment noted.

21. Alternatives

No comments related to this technical area were made.

22. Unavoidable Significant Adverse Impacts

No comments related to this technical area were made.

23. Growth-Inducing Aspects

No comments related to this technical area were made.

24. Irreversible and Irretrievable Commitments of Resources

No comments related to this technical area were made.

25. Conceptual Analysis

No comments related to this technical area were made.

G. General

Comment G-1: We must also increase resources for HPD and our nonprofit partners to help longtime tenants and homeowners securely remain in their existing affordable homes, safe from harassment and predatory practices.

[Ossé-02, Hudson-02]

Response G-1: Comment noted. Throughout the AAMUP Planning Process, DCP and HPD have engaged in outreach including canvassing tenants in the surrounding

area, holding a tenant resource fair, and coordinating additional community events. HPD is channeling resources to AAMUP through the Partners in Preservation Programs, along with other programs and services, for homeowners and legal counsel for tenants facing harassment and displacement pressure. Specific outreach efforts are anticipated to continue, however the planning and implementation of these programs is outside the scope of this environmental analysis.

Comment G-2: I urge the Administration to bring investments to improve the public realm at the Franklin Avenue Station and the surrounding areas. According to the DEIS, the highest number of incremental subway trips is expected to occur at the Franklin Avenue (C/S) Station. With expected heavy usage of this station, it is key to ensure the aesthetics, sanitation, and public safety of the surrounding areas are met.

[Ossé-05, Backus-02]

Response G-2: Comment noted. As described in **Chapter 13, Transportation** of the **FEIS**, there is no significant adverse impact at the Franklin Avenue Station as a result of the Proposed Actions. Improvements to aesthetics, sanitation and station safety and maintenance are outside the scope of this environmental review.

Comment G-3: I also urge the Administration to work with the MTA to bring structural improvements to the station overpass and the small MTA properties surrounding it, some of which are covered with barbed wire fences, graffiti and litter and system improvements for better train service.

[Ossé-07]

Response G-3: Comment noted. See **Response G-2**.

Comment G-4: DOT has been a partner with the DCP, HPD, DPR, and others on these AAMUP efforts. Whether it's been participating in workshops, contributing safety data and operational information, providing expertise on best practices or information on relevant and applicable past projects. We have developed as series of street improvement projects (SIPS) which will begin to advance the street safety goals laid out in the AAMUP community vision and properties report. These kinds of projects include painted curb extensions, enhanced crossings, markings. DOT would like to reaffirm to the Commission our partnership with DCP now and into the future.

[Henley-01]

Response G-4: Comment noted.

Comment G-5: GMDC appreciates the planning work that has gone into encouraging modern manufacturing to flourishing in the AAMUP area, recognizing that many of today's manufacturers are good neighbors to both residential and commercial uses. We hope the conversation can continue as rezoning moves through ULURP these mixed-use projects can incorporate industrial uses that may have a chance to develop and bring good quality jobs.

[Coleman-01]

Response G-5: Comment noted. See Response 1-9.

Comment G-6: The project should implement a road diet on Atlantic Avenue east of Flatbush Avenue:

- Convert this stretch of the Avenue to two general travel lanes in each direction, aligning it with Atlantic Avenue to the west of 4th Avenue and east of Nostrand Avenue.
- Repurpose the removed travel lanes to install parking-protected bike lanes in both directions.
- Convert Atlantic Avenue between Flatbush and 6th Avenues into a pedestrian plaza.
- Where possible, eliminate turns and remove turn lanes/turn bays.
- Remove all slip lanes and use curb extensions to calm turning traffic at diagonally intersecting streets.
- Plant additional trees along the avenue at the most frequent interval possible.

[Morano-04]

Response G-6: Comment noted. Refer to **Response 13-1**. Street trees will be planted along the avenue at development sites in accordance with the Zoning Resolution.

Comment G-7: The project should add protected cycling infrastructure to the north- and south-running approach blocks that are major cycling corridors:

- For example, the block of Vanderbilt Avenue between Pacific Street and Atlantic Avenue can support barrier-protected bike lanes, as can the same block on Franklin Avenue. These approaches should be protected to increase safety for cyclists entering the intersection.

[Morano-05]

Response G-7: Comment noted. The Transportation assessment in the FEIS has been conducted pursuant to Final Scope of Work and the guidance of the CEQR Technical Manual, which does not include methodology for evaluating the adequacy of cycling infrastructure.

Comment G-8: The project should implement pedestrian safety improvement using “light-touch” measures:

- Add fully protected light cycles for pedestrians and cyclists, in which concurrent vehicular turns are banned, to all intersections within the project zone. This could be implemented as a Barnes Dance – in which only pedestrians and cyclists can cross, and all vehicle traffic is stopped.
- Daylight all intersections within the project zone using hardened barriers.

- Building out pedestrian refuge islands using concrete on all north-south crossings.

[Morano-06]

Response G-8: Comment noted. Refer to Response 13-1. Mitigation measures have been identified, see Chapter 20, Mitigation of the FEIS.

Comment G-9: The project should implement the redesign of Dean and Bergen Streets as bike boulevards to facilitate east-west bicycle travel through the project zone.

- Reduce speed limits on Bergen and Dean Streets to 15 mph.
- Implement green wave timing that will prioritize bike traffic.
- Add Leading Pedestrian Intervals (LPIs) at every intersection.
- Install clear signage indicating that children and cyclists are using the street.
- Implement daylighting at critical intersections, with hard infrastructure and build curb extensions to shorten crossings.
- Reverse the car traffic direction of select Bergen and Dean Street blocks and add modal filters to prioritize people biking and discourage cut-through traffic.
- Eliminate truck routes near schools along Bergen Street.
- Install bike corrals at the corners of school streets on and within 0.5 miles of Bergen/Dean Streets.
- On parts of this corridor that include bus routes, transit plaza blocks or similar treatments should be implemented that prioritize buses in addition to cyclists and pedestrians.
- Implement automated camera enforcement of bike lanes and double-parking violations, as authorized by VTL § 1111-C-1.

[Morano-07, Leamon-01]

Response G-9: Comment noted. Refer to Response 13-1.

Comment G-10: The project should convert Pacific Street between Washington and Underhill Avenues into a pedestrian plaza.

[Morano-08]

Response G-10: Comment noted. See Response 5-1.

Comment G-11: The project should install modular bus boarding islands to improve accessibility and allow passengers to board the bus at stops without requiring drivers to pull over to the curb.

[Morano-09]

Response G-11: Comment noted. Refer to Response 13-1.

Comment G-12: Designate operating funding for public space programs within the project zone including Open Streets and plaza programs.

[Morano-10]

Response G-12: Comment noted. Refer to Response 5-1.

Comment G-13: We strongly recommend the redesign of Atlantic Avenue as a linear park as part of long-term planning for capital improvements:

- Eliminate additional general travel lanes in favor of expanding green space for pedestrian and center-running bus lanes.
- Repurpose all curb space to prioritize protected cycling infrastructure.
- Widen sidewalks and add trees.
- Implement curb management that includes/prioritizes loading zones, bike parking, outdoor dining, bioswales, and containerized trash.

[Morano-11, Veconi-07, Leamon-01]

Response G-13: Comment noted. Refer to Response 13-1.

Comment G-14: We strongly recommend the redesign of Vanderbilt Avenue south of Atlantic Avenue as a slow street, including the following elements:

- A protected two-way bike lane.
- Transit plaza blocks
- Expanded sidewalks and built-out curb extensions.
- Curb management that includes/prioritizes loading zones, bike parking, outdoor dining, bioswales, and containerized trash.

[Morano-12, Veconi-08]

Response G-14: Comment noted. Refer to Response 13-1.

Comment G-15: Further expand the footprint of Lowry Triangle/Underhill Plaza to incorporate the block of Pacific Street between Washington and Underhill Avenues.

- Integrate this plaza into the Atlantic Avenue Linear Park.

[Morano-13]

Response G-15: Comment noted. As noted in **Chapter 25, Mitigation** of the **FEIS**, renovations are expected to continue at Lowry Triangle and the recently pedestrianized Underhill Plaza. Specific design improvements to the parks are outside of the scope of this environmental review.

Comment G-16: Create a north-south running protected bike lane along Vanderbilt Avenue from Grand Army Plaza all the way to the Flushing Avenue greenway.

[Morano-14]

Response G-16: Comment noted. See Response G-7.

Comment G-17: We support Brooklyn Community Board 8's call for the HPD to create a new class of lottery preference to allow persons displaced from Community District 8 preference for 50% of the affordable apartments created in buildings developed under AAMUP.

[Veconi-02, Wedderburn-02]

Response G-17: Comment noted. See **Chapter 1, Project Description** of the **FEIS** for a description of the MIH program, as analyzed in the RWCDS, and **Chapter 3, Socioeconomic Conditions** of the **FEIS**.

Comment G-18: I strongly support this project to work on improving pedestrian and cycling safety around and on the corridor. The road as it is right now incredibly dangerous for pedestrians and cyclists.

[Alvarez-02]

Response G-18: Comment noted. See **Chapter 13, Transportation** of the **FEIS** for the Vehicular and Pedestrian Safety Evaluation.

Comment G-19: The thing that I'm concerned about are tenant protections. We know that people are facing evictions are more likely to be successful in saving their evictions if they have legal representation. As we know from different zones within or near our communities, specifically zip codes 11213, 11216, 11238, and 11233, we have had a lot of displacement. Representation makes a difference of someone being able to stay there.

[Wedderburn-01]

Response G-19: Comment noted. See **Chapter 3, Socioeconomic** of the FEIS.

Comment G-20: This is very important that we get this project to proceed as quickly as possible. We have been waiting for a long time. We urge the funding of an ongoing monitoring group so that we would be able to continue to monitor progress and monitor the obligations, as stated at this time.

[Wedderburn-03, Witherwax-04]

Response G-20: Comment noted. Commitments made as part of the AAMUP will be updated on the Department of City Planning's NYC Rezoning Commitments Tracker, which is available online at:

https://morr.maps.arcgis.com/apps/MapSeries/index.html?appid=e53a9d13cad442829c5db6c7bc1b16d8

Comment G-21: Moving to some of the economic development aspects of our comments on the AAMUP, the workforce/career development programs and apprentice incentive programs go hand in glove with keeping light industrial uses here present in an otherwise residential community in ways that are compatible and non-exclusive. The local entrepreneurship capital fund, for example, as well as the green technology incubator, and even a relocation fund much like you

would do with residential tenants. Perhaps a model for commercial as well could be explored.

[Witherwax-02]

Response G-21: Comment noted. See Response 2-1.

Comment G-22: We have called for a master plan for the local stakeholder community to develop a comprehensive plan for the street network that addresses many of the concerns that the Commissioners have brought forth in today's hearing and that Dash Henley (DOT) brought up in his testimony too. We are taking a more wait and see approach than perhaps the Borough President did with calling for a road diet right away, but that would be certainly something we would entering at the Community Board level.

[Witherwax-03]

Response G-22: Comment noted.

Comment G-23: I implore that the proposal prioritizes locally owned small businesses in its commercial programming.

[Leamon-02]

Response G-23: Comment noted. This is outside the scope of this environmental review.