

FORT GREENE PARK CONSERVANCY, INC.
85 SOUTH OXFORD STREET
BROOKLYN, NY 11217

August 23, 2006

TO: Empire State Development Corp.
RE: Atlantic Yards Proposal

Fort Greene Park is a public City park that lies between DeKalb and Myrtle Avenues, a few blocks east of Flatbush Avenue. Half of its 30 acres are within one-half mile of the Atlantic Yards Project Area, according to the Atlantic Yards DEIS.

The Park is a national treasure. It was created at the urging of Walt Whitman, when he was editor of the Brooklyn Eagle. It was designed by Olmstead and Vaux in 1867 and features a monument designed by Stanford White as a memorial to the 11,500 Americans who died on English prison ships during the Revolutionary War. The bones of many of these martyrs are interred in a crypt in the Park.

The Park is also a vital and well-used community resource. Its children's playgrounds, basketball courts and tennis courts are usually brimming with activity. Local residents walk their dogs in the park, have picnics, or simply enjoy the sun and the stately old trees. Students from nearby Brooklyn Tech use the Park for gym classes, while nearby elementary schools bring students for educational activities. Summer nights are given over to concerts and film festivals. In fact, the Park is already so heavily used that there are serious overcrowding issues in the children's playground as well as soil erosion issues that must be addressed.

The Fort Greene Park Conservancy is deeply concerned about the material and adverse impacts that the proposed Atlantic Yards Project will have on the Park. In particular, we are concerned about: (1) increased Park usage by the expected 14,000 new residents and 4,000 new office workers in the Project; (2) increased traffic on the perimeter streets; and (3) new shadows that will be cast on the Park. Although half of the Park is within one-half mile of the Project area, these impacts have been excluded from study by the DEIS.

Public Space

Currently, the open spaces that are available in the vicinity of the Project for both passive and active uses are significantly below the recommended guidelines of the Department of City Planning. Upon completion of Phase I of the Project, there will be a further material decrease in the amount of public space available per 1,000 residents and 1,000 office workers in the area, according to the DEIS. If and when Phase II is completed, the DEIS claims that the addition of 7 acres of "publicly accessible space" will more or less restore the ratios of passive public space per 1,000 residents and office workers to their current inadequate levels, although the reduction in spaces devoted to active uses will not be restored.

But the proposed "publicly accessible space" is not a real park -- it consists primarily of some grass and walkways around the proposed towers. Much of this space appears to be planned for the north sides of the towers, and will be perpetually in their shadows. Only 10% of the 7 proposed acres, or seven-tenths of an acre, will be devoted to active uses, including volleyball, bocce courts, skating, frisbee and children's playgrounds. Even if all of these activities can be packed into just seven-tenths of an acre

– which we believe is unlikely – there is still no provision for basketball or tennis courts, ballfields for baseball, soccer and cricket, dog runs, or other common uses of public spaces in Brooklyn. The Ratner Organization has proposed to deed this publicly accessible space to a new not-for-profit organization which it will form, but has not provided any details regarding the organization’s governance or budget, so the fate of this “publicly accessible space” is uncertain.

Moreover, the calculation that 7 acres of “publicly accessible space” will be added to the area fails to take into account the loss of sidewalks on Pacific Street, the narrowing of sidewalks on numerous other streets, and the impairment of other open spaces in the area by the shadows that will be cast by the new towers. If these losses are taken into account, we believe that the DEIS analysis would reveal an even more substantial and adverse impact on the open space ratios.

It is crystal clear that the Project’s proposal for 7 acres of “publicly accessible space” is a woefully inadequate substitute for a real park. It will force thousands of the 14,000 new residents and 4,000 new office workers to crowd into the already overused parks and public spaces in the area, including Fort Greene Park.

Traffic

DeKalb and Myrtle Avenues, which flank Fort Greene Park to the north and south, are both major arteries that already are used by drivers seeking to avoid the bottlenecks of Atlantic and Flatbush Avenues and Fulton Street. They are both within the area studied by the DEIS for traffic impact. The DEIS shows the substantial increases in traffic that the Project will bring to Vanderbilt Avenue and Flatbush Avenue at the intersections of DeKalb and Myrtle Avenues, at virtually all times of day, but it fails to consider the increased traffic on DeKalb or Myrtle Avenues themselves.

It is already difficult for pedestrians to cross DeKalb and Myrtle Avenues to get to Fort Greene Park. Not every intersection has a traffic light. The added traffic on these two arteries will make access to the Park even more perilous. And of course the traffic will bring more noise and air pollution.

We are disappointed that the DEIS fails to take these impacts into account.

Shadows

Figure 9-01 of the DEIS shows that the shadow sweep area of the proposed Project includes a substantial portion of Fort Greene Park. But the shadow-impact analysis excludes the Park from the study area. We don’t understand why.

We believe that any increase in shadows on the Park will increase soil erosion problems on the slopes at the DeKalb Avenue entrances and threaten the already fragile ecology of the Park. These impacts must be studied, and mitigation measures should be proposed for any adverse impacts.

The Fort Greene Park Conservancy, Inc.