Tri-State Transportation Campaign Preliminary Comments on the Draft Environmental Impact Statement for Atlantic Yards
August 2006

PARKING

The DEIS documents state that by 2016 the developer will build 3800 permanent parking spaces to supply parking for those will drive to the project site, under either the residential or commercial alternative. Those parking spaces will be constructed in six new parking lots. Most of the new parking demand will come from those driving to and from the arena.

By 2010: Two underground permanent lots will be constructed—one with 350 spots, one with 400 spots. An additional 1596 temporary parking spaces will be in one small underground lot (182 spaces) and two surface parking lots (944 spaces and 470 spaces). (Page 12-53).

By 2016: residential and commercial buildings will be built on top of surface lots, and additional four permanent lots will add 3050 parking spaces, for a total of 3800 new permanent spaces. Figure 1-12.

More thoughtful discussion on parking is necessary

Parking demand is not static- it fluctuates greatly depending on supply of parking, price of parking, and other transportation options available. The DEIS offers limited discussion of this dynamic, instead asserting how many parking spaces will be required to supply demand. According to this logic, the DEIS says the maximum number of spaces necessary to supply new demand from all aspects of the Atlantic Yards project (not including other demand from other projects) will be 4977 spaces, required for peak demand when the Nets have a weekday evening game in 2016 (with the residential variation) (Page 12-91). Still, during this peak demand, there are 596 spaces within ½ mile radius that will be vacant. Mitigation measures discussed in Chapter 19 will further reduce the parking demand, likely making even more spaces vacant.

This is an outdated method of planning transportation systems: predicting demand, and providing the necessary supply, without questioning how to influence the demand in the direction of a desired outcome. The final EIS should use a more appropriate approach for a dense project over a transit hub by using a supply side method. The developer should decide how much excess traffic capacity there is on local roads, decide how many new cars the street system can handle, and then provide parking only for the number of cars, using appropriate HOV and other assumptions. The developer and ESDC have not done this, since the project, by 2016, is anticipated to have serious adverse impacts on 63 intersections of 93 studied in one or more peak hours (12-73).

Reduction in parking supply is possible

Even during the busiest times at the arena (weekday evening 7pm Nets game in 2016 with the residential alternative), the DEIS predicts there will be 596 parking spaces still open within a ½ mile walk of the site (12-91). The remainder of the time, in 2016 with

the residential alternative, over 2000 parking spaces will be vacant. The developer should revisit parking supply and demand to provide less than 3800 new parking spaces. Drivers could be encouraged to use transit by discouraging auto use and further encouraging mass transit through mitigation methods in Chapter 19. (Page 12-91) (Page 19-6). Local zoning requirements should be changed to set maximum, rather than minimum, parking space requirement. The Empire State Development Corporation, as lead agency, is already overriding local zoning codes to construct the dense project, and has the power to change any parking requirements. The ESDC's scoping document state that it will need to change city parking codes in the study area.

Interim surface parking lot should be eliminated

The developer plans to tear down buildings on the block bounded by Vanderbilt and Carlton and Dean and Pacific to build a 944 surface parking lot. This lot should be eliminated from the plan. It will encourage arena attendees to drive to the site, have negative impacts on new and old businesses along Vanderbilt Ave, and make the area less attractive and safe. The developer asserts that the site is blighted now and the project will help reduce blight, but a large surface parking lot will only encourage new blight. A surface parking lot will hamper NYC DOT plans to implement traffic calming along Vanderbilt Ave, and discourage the commercial redevelopment that is occurring along the street a few blocks south. The DEIS does not make the case for this new lot, since even at the busiest times in 2010 (7pm during weekday Nets game), there are 800 vacant parking spaces within ½ mile of the project. (Page 12-53).

New arena driven, private off site parking should be prohibited

There is no discussion in DEIS about the potential for development of an off site parking industry around the project area, that could encourage more people to drive to the site, and further exaggerate already significant traffic impacts. Around Madison Square Garden, for example, there are numerous private parking garages that are used by those attending events at the arena. The developer should work with the Department of City Planning to ensure that restrictions are put in place to prohibit new arena driven private parking garage construction within a 1/2 mile radius of the site.

Offer more incentives to shift even more people onto transit

The Tri-State Campaign applauds the developer's inclusion of transit fare discounts and a 400 space bicycle parking to promote use to the site. We are glad the developer is offering the transit incentive specifically to reduce auto trips by 20%. However, we question whether a $2.00 price incentive on a round trip transit fare is going to encourage more people to use transit to relatively expensive arena events. The data used to come up with this estimate, such as the implementation of Metrocard fare discounts in the late 1990s, may not apply to individual arena events. The Metrocard discounts applied to all trips, potentially saving riders hundreds of dollars a year. This is very different than a $2 fare discount for a few Nets games. A stronger inventive would be to include a mass transit fare included in every ticket sold.

Residential parking permits should be studied in the DEIS and implemented

The DEIS clearly states that some arena attendees will park on-street at free spaces (19-46). To further reduce auto use, a residential parking permit program should be implemented during arena events. For example, the residential parking permit program put in place for night games around Chicago's Wrigley Field is administered by the Chicago Clubs. We urge the Nets to create and manage a similar residential parking permit program on game days on local streets around the Nets arena.

MITIGATION

The mitigation plan offers a list of street network and on street parking changes, along with demand management strategies, that the developer say will fully mitigate significant adverse impacts at 33 of the 60 significantly impacted intersections in 2010, and reduce impacts at another 24 intersections and 29 of the 68 significantly impacted intersections in 2016.

Off site parking and shuttle service

Shuttle services from remote parking lots at Metrotech and western Atlantic Ave will likely get stuck in traffic to and from the site. We question whether a 50% parking price discount provide a large enough incentive provide for people to use this option.

Further managing travel demand through HOV parking restrictions

The developer should extend the HOV requirements to all lots on project site, not only the arena site. HOV restrictions should be required at any temporary parking that is constructed as part of Phase 1 (19-7). Who will run this?

The City and MTA must implement the mitigation plan

The developer does not control the street network or the transit system. The NYC DOT should implement any necessary roadway configuration changes, and the MTA should add subway and transit service as necessary to deal with increased ridership.

TRANSIT AND PEDESTRIANS

Subways

New peak hour should be studied: We urge further investigation of the 6-7 p.m. subway peak hour for Nets game nights in the final EIS. The draft EIS defines 7-8 p.m. hour as the pre-game subway peak hour, and 5-6 p.m. as the evening commute subway peak. However, Nets games currently begin at 7:30 p.m., suggesting that many subway trips to the arena would take place and/or begin during the during the 6-7 p.m. hour, where they will be added to still-significant evening commute demand.

Future demand and loading guidelines

Future demand on subway trains in the EIS is as follows, looking at the relevant subway lines in the a.m. and p.m. peak hours at each line's "maximum load point" (see attached table that compiles EIS subway line-haul data):

- In the morning peak, the EIS projects an overall rider increase at the point of maximum load of 4.27% by 2010, and an 11.2% increase by 2016, or an average of slightly over 1% per year.

- In the evening peak, the EIS projects an overall rider increase at the point of maximum load of 5.54% by 2010, and a 13.8% increase by 2016, or an average of 1.25% per year. It notes that morning peak demand is more concentrated than in the evening, so the volume/capacity ratios in the a.m. peak are much tighter.

- In the morning peak, if the EIS rider projections are correct, overall volume/capacity ratios on affected Brooklyn subway lines at the point of maximum load will increase from .69 in 2005 to .72 in 2010 to .77 in 2016.

- In the evening peak, if the EIS rider projections are correct, overall volume/capacity ratios on affected Brooklyn subway lines at the point of maximum load will increase from .55 in 2005 to .58 in 2010 to .63 in 2016

Regarding subway passenger volume and capacity, the use of official NYC Transit subway "loading guidelines" to define subway trains' "practical capacity limits" (13-54) may understate subway crowding impacts as understood by everyday straphangers. That is because the official loading guidelines give riders only three-square-feet of standing room during rush hours (that's a box 21 inches by 21 inches). The EIS, however, claims that since no V/C ratio using these guidelines on any subway line exceeds 1, then no significant subway crowding impact is predicted.

Recent ridership trends indicate higher than anticipated future growth
Regarding likely future subway ridership in Brooklyn, it is worth noting recent trends (Source: NYC Transit. "2005 Subway and Bus Ridership Report" pp H23-24).

- In the decade from 1995-2005, subway ridership in New York City grew dramatically, by 41.6%. Most of this (36.4%) was during 1995-2000, reflecting a very robust local and national economy, new transit fare discounts and improving subway conditions. Growth in 2000-2005 was a more modest 4.9%, but nonetheless continued during the period despite two years when subway use declined owing to the Sept. 11 2001 attack and system disruptions and difficult economic conditions thereafter. Subway use in 2005 grew 2.7% over 2004 despite a fare increase for many riders in February and a three-day transit strike in December. 2005 saw the highest NYC subway use since 1953.

- Growth in the use of subways in Brooklyn has outpaced even the dramatic city-wide increases. From 1995 to 2005, subway ridership in Brooklyn increased 47.4%, while during 2000-2005 ridership grew by over 8%, or over 1.6% per year.

While these trends reflect overall annual ridership growth, not the specific peak demand growth estimated in the EIS, any consideration of adding riders to Brooklyn subways needs to be viewed in their context. They suggest that it is highly possible that the EIS underestimates future subway demand in Brooklyn. If demand for peak subway travel is a few percent more per year than provided for in the EIS, volume to capacity ratios on

some subway lines may edge up even closer to 1, even under NYC Transit's cattle-car like "loading guidelines." The EIS does note that the residential mixed use project variation generates fewer daily subway trips than the commercial mixed-use variation, but that the residential variation generates proportionally more trips in the prevailing peak direction of subway travel (apartment dwellers in the project heading to jobs in Manhattan).

It is worth noting that NYC Transit recently admitted that it had underestimated the impacts of demographic and development changes along the L subway line (*Daily News*, July 7, 2006), leading to horrendous peak crowding problems with no solution at hand, and that current MTA capital programs will not add to the subway fleet serving Brooklyn. The yet-to-be defined next MTA capital program will cover the years 2009-2014.

Buses

The project's impact on bus speeds must be studied

The project will affect bus speeds in an area with some of the slowest buses in Brooklyn. The Straphangers Campaign's "Pokey" award for slowest Brooklyn bus has been repeatedly awarded to a route that directly serves the proposed project – the B63. In 2002, 2004 and 2005, the B63, traveling on 5th, Flatbush and Atlantic Avenues was named the borough's slowest bus. The immediate project area features other notably slow bus routes. The B52, serving Greene Avenue and Fulton Street was the 3rd slowest bus in Brooklyn in 2005 and the 2nd slowest in 2004. The B41 on Flatbush Avenue is only marginally faster.

The EIS states that additional congestion created by the project will further slow service on these and other nearby NYC Transit bus routes. The only identified solution is to add even more large vehicles to the traffic mix: "Additional buses may therefore be needed during these periods to maintain the current headways and service schedules"[13-56 and 13-89]. A traffic plan that further clogs and worsens bus travel rather than speeding it does not belong in a booming 21st Century metropolis. We recommend that the project sponsor take a tougher look at managing traffic in the vicinity of the proposed project and consider more stringent measures to increase the project's mass-transit orientation, such as fewer constructed parking spaces, reduction in the extensive set of drop-off zones (for taxis and car services) along Flatbush Ave, Atlantic Ave, Dean St, and 6th Ave surrounding the arena site (Figure 12-5a), exclusive bus lanes on Flatbush and other traffic calming and management techniques that help motorists learn to avoid the project area altogether. The traffic plan should give buses first priority as the vehicles for which delay should be avoided, and place the needs of private vehicles last. The developer should also make clear how bus route will be able to turn left across already busy Flatbush Ave.

Drop off lanes could hinder NYC DOT's Implementation of Flatbush Ave Bus Rapid Transit

One significant oversight in this regard in the EIS is any consideration of how the Flatbush Avenue drop-off lane is supposed to mesh with the current NYC DOT/NYC Transit effort that is considering a bus rapid transit line on Flatbush Avenue. Bus lanes on Flatbush and therefore bus service to and from the project site will be significantly disrupted by taxi, limousine and car traffic pulling across it to the planned drop-off area. The need for drop off lanes is not made clear in the DEIS. We urge that the Flatbush drop-off lane be removed from consideration, that rapid and high-frequency bus service along Flatbush Ave be fully designed into the project and that drive-up auto/taxi access be re-routed and restricted to smaller streets such as 6th Ave and Dean St.

Contact: Jon Orcutt, Kate Slevin
Tri-State Transportation Campaign
212-268-7474