



NEW YORK STATE LEGISLATURE

March 12, 2018

Via Email and First Class Mail: info@BQE-i278.com

Ms. Tanvi Pandya
Project Manager
BQE Project Team
New York City Department of Transportation
605 Third Avenue, 3rd Floor
New York, NY 10158

RE: Rehabilitation/Replacement of the Brooklyn Queens Expressway from Atlantic Avenue to Sands Street, Kings County (Brooklyn, NY)
CEQR Number: 18DOT026K

Dear Ms. Pandya:

We write to comment on the Draft Scope of Work (Draft Scope) prepared in connection with the New York City Department of Transportation's (NYCDOT) impending reconstruction of the I-278/Brooklyn Queens Expressway (BQE), from Atlantic Avenue to Sands Street, including the triple cantilevered portion circumnavigating Brooklyn Heights. The proposed project is constructed at a uniquely economically sensitive and congested section of the Interstate highway system. We applaud NYCDOT's active engagement of the community in the time leading up to the issuance of this Draft Scope. We agree with the agency that the project's impacts will be great; hence we believe that the EIS process must be as thorough, comprehensive, and inclusive of community stakeholders as possible. In recognition of the immense impacts on the community, additional amenities and improvements should be made available to the affected neighborhoods to offset the impacts of the construction. We ask that you engage the communities in connection with this in the coming months.

Project Site and Study Area: The Draft Scope indicates that a proposed study area perimeter of a quarter mile from the site project will be used. We believe that is entirely too small and too oddly shaped a study area (figures 6, 7, and 8 in the Draft Scope). The study area must be expanded and designed to align with the street network to make sense and enable accurate data collection. Community stakeholders should be engaged using commonly understood terms of reference in order to have a contextually accurate and appropriate understanding of the effects on the communities involved. For example, the current study area sweeps up Clinton Street for a few blocks, but veers west, north of State Street to Joralemon Street, and then north mid-block between Henry Street and Clinton Street. It is difficult to comprehend the study area with such boundaries. Expanding the study area to a perimeter of one (1) mile (excluding any reach into Lower Manhattan) would allow for a more comprehensive assessment of transportation and air

quality impacts, as well as opportunities to mitigate those impacts. Failing that, the study area should be expanded and conform with the street network and a secondary study area should be created to study impacts farther from the site, yet in the direct path of traffic congestion and other impacts (such as Union Street to Fourth Avenue and proceeding north to Flatbush Avenue, and north to the Manhattan Bridge or the BQE Eastbound at Tillary Street). The current proposed study area doesn't consider Tillary Street, a thoroughfare which will bear the brunt of much of the diversions from the project area.

Below we discuss particular issues as they relate to specific EIS tasks to be performed.

Socioeconomic Conditions

As noted above, the study area should be expanded to a perimeter of 1 mile aligning with the street network. The proposed perimeter is simply too small an area to assess the impacts to population, housing and economic activity. Brooklyn Heights—the oldest New York City historic district which includes many of the oldest buildings in the area—is particularly vulnerable, especially those properties closest to the Promenade and the triple cantilever. Economic activity in the area within the arc of the BQE must be included as there is a strong likelihood that economic activity centered in and around the Downtown Brooklyn business district will be affected dramatically by the reconstruction.

Urban Design and Visual Resources

Of concern to many in the community is the preservation of the protected scenic view plane (SV-1) from the Brooklyn Heights Promenade. Others are concerned about the impact of raising the level of the promenade should Remsen Street be determined to be a location for a bridge to the Brooklyn Bridge Park. While the community has most often identified the end of Montague Street as a natural location for a connector to the Brooklyn Bridge Park, a prior study done by the State of New York in connection with its 2008 planning studies indicated that Remsen might be a viable location for such a bridge. We have endorsed the further study of such a connector to Brooklyn Bridge Park and request that NYCDOT include such study in the EIS.

Transportation

The Draft Scope identifies 108 intersections to be analyzed. These intersections should be considered to be within a secondary study area, as conditions at the identified intersections will have impacts throughout the area. Those impacts are best studied in a comprehensive framework and it is critical for NYCDOT to consider traffic flow for all types of traffic, both current and proposed, including cyclists, pedestrians, and plans for future transportation solutions like the Brooklyn-Queens Connector (BQX). It is also paramount that local streets be protected from diversions of traffic from the BQE. A special focus should be on discouraging vehicles, especially trucks, from using neighborhood streets as a detour route, and appropriate signage and resources to combat that should be considered. With nearly 5 million visitors to Brooklyn Bridge Park annually arriving on foot, the protection of pedestrian access and safety is critical.

Air Quality

The EIS must identify with precision the steps to be taken to mitigate construction dust and debris. As the agency has indicated, there is likely to be significant carbon emissions and release of particulate matter, which should be studied to a finer degree than the current PM 2.5 standard,


as studies have shown that particulate matter finer than 2.5 is more damaging than previously understood.

Noise

We understand that this project will necessitate noisy construction. We call on the NYCDOT to plan construction schedules so as to keep the noise to a minimum, to begin construction no earlier than 8:00 AM and end no later than 8:00 PM, and to limit construction to weekdays.

We also share our constituents concerns about the noise, vibration, and disruption from this project and from motor vehicles, especially large trucks which have long been a concern for residents along Columbia Heights, Pierrepoint Place, Montague Terrace, Willow Street, Grace Court, Remsen Street and Middagh Street, whose properties are most vulnerable. Design for the future roadway must permanently address these problems, as well as reduce the overall noise impacts of the project.

Very truly yours,



Assemblymember Jo Anne Simon



Senator Brian Kavanagh



Senator Velmanette Montgomery



Assemblymember Walter T. Mosley

cc: Brooklyn Borough President Eric L. Adams
Council Member Stephen Levin