

Comments of Council Member Margaret S. Chin
Regarding
The Draft Scope of Work for a
Generic Environmental Impact Statement for the
Seward Park Extension Urban Renewal Area

October 11th, 2011

I would like to thank the Office of the Deputy Mayor for Economic Development, the Economic Development Corporation and the Department of Housing, Preservation and Development for holding this hearing and giving the public an opportunity to comment on the Draft Generic Environmental Impact Statement. It is incredibly important to the future of the Lower East Side that we can now begin to develop these parcels and create new opportunities for affordable housing and new small businesses for this community.

I also want to thank the planning facilitators of Pratt University. Mr. John Shapiro and his colleagues did a great job assisting the community with identifying and organizing their priorities. This is vital to a community planning effort. I also want to thank the firm of Beyer, Blinder, and Belle for their contribution. By guiding the conversation about the urban design impacts, the community was able to express their needs for developing these parcels and helping people to understand how design can impact a community.

Finally, and most importantly, I want to thank Community Board 3, residents, Tenant Associations, local businesses, non-profit organizations, and neighbors from surrounding communities. Over the last few years you have attended meeting after meeting. You have worked late into the evening. You have developed a plan and strategy for the coming future of your community. You have crafted a statement of principles that will define a significant part of the Lower East Side for years to come. I am extremely proud of the progress you have made here and I will do everything I can to make sure that this happens.

I will now take some time to highlight some of the important impacts that the development of these site will have. For each section a list of accompanying questions to be investigated is included.

SOCIOECONOMIC CONDITIONS

The impact on the socioeconomic conditions in my district is something of great concern to my constituents and me. There is a legitimate fear that the market rate units that will be constructed will hasten gentrification in the neighborhood which will further negatively impact socioeconomic conditions in the community. The development of market rate rental residential units has already negatively impacted the community thus far. The creation of new market rate units could cause further problems and that potential impact must be investigated. This project will certainly directly displace residents on one of the sites. There will also be direct business displacement because of the project as well. Further, a community healthcare facility could be lost because of the mixed-use development.

In addition, the creation of new commercial retail space in the Lower East Side could cause demand increases and thus lead to speculation by real estate interests. In order to combat this potential problem the Final EIS should consider and study methods to retain businesses that offer affordable goods and services. One of the most important characteristics of a community is the diversity of businesses within that community. The EIS should study methods that can be employed in the new development where the celebration of diverse businesses in the Lower East Side is fostered.

Socioeconomic conditions are perhaps the most delicate components that could be adversely impacted by this development. Already the influx of people paying increasing market rate rents has had a negative impact on several issues. Market speculation has already driven up commercial rents in the area and is sure to have the same impacts on residential rents as well.

TRANSPORTATION

Any new development at this site will have significant impacts on transportation to and from the area. Currently the site is served by three train lines (the J, Z, and F lines) as well as several bus lines (the M9, M14A, the M21 and M15 on nearby Allen Street). It will be necessary to understand what the impacts to this multi-modal area will be. As more New Yorkers begin to use trains, buses and bicycles as their primary mode of transportation understanding these impacts will become more important. In addition, what will the increased trip generations to do vehicle travel over the Williamsburg Bridge? How will this affect the growing number of cyclists that traverse the bridge and that come to the area?

The buildout of these sites will also bring more pedestrians to the area and at least between two and three thousand more residents. Delancey Street is a very wide street and is dangerous enough as it is. Increasing the number of people crossing this street will only make it more so.

What improvements can be made that will enhance their safety when crossing to access the site?
What new features will be necessary to separate pedestrians and motor vehicles and thus further ensuring pedestrian safety?

In the Traffic, Transit, and Pedestrian Study Areas section of the EIS, figure 4 notes the intersections that will be studied. I would ask that the intersections of Orchard and Broome Streets as well as Orchard and Grand be included. These streets serve large numbers of vehicular traffic trying to access the Williamsburg Bridge and thus must be included in the study areas.

ALTERNATIVES

An alternative No Build Action is simply unacceptable for the future well-being of the area and while it must be studied as per CEQR and SEQRA Guidelines, it cannot be seriously considered. The economic viability of the area will depend on the build out of these sites.

With respect to alternatives that analyze the movement of the Essex Street market, an investigation into the continued success of the market if expanded on a new site must be analyzed with respect to the continued use of the market site. The expansion of the market in the current location, as noted by Community Board 3 Manhattan's comments, must also be studied.

Other alternatives not specifically required, however qualitatively important to the EIS Scoping process, would be to examine alternative ratios with regard to increased residential and commercial components. For example, would the project substantively achieve the same goals if the housing side of the ratio were increased to 65% or 70%? Would consequently lower commercial ration be significant enough to reach the self-sufficiency goals that the City has set?

I would also like to suggest other financing and housing options. Would the project achieve the same goals if a land trust were put in place? Would a cooperative housing model financed by the commercial component be equally as successful? Would the maximization of affordable units well above 450 units be better for the community with respect to potential impacts?

What about incorporating other planning workshops results into the Final EIS? These workshops were undertaken using the same methods as those used to produce the Community Board's Final Development Guidelines.

Has the EIS taken into account the need for more affordable housing units because of returning site tenants and their progeny to the newly constructed project? There was no mention of returning site tenants anywhere in the EIS Scoping documents and must be adequately addressed.

Has sustainability been properly incorporated and addressed by each component of the Draft EIS? What further sustainability measures can be added that further enhance the project? What would be the impact on the future Reasonable Worst Case Development Scenario if sustainability standards were incorporated in the Final EIS and subsequent RFP's?

Conclusion

These sites represent a significant opportunity for the Lower East Side. We have a chance to create affordable housing that will benefit future generations. The key to success in developing these sites will be equitable distribution of truly affordable housing throughout each development site. Increasing the percentages of affordable housing must be attempted through innovative partnerships between the City and affordable housing developers.

New development will provide economic opportunities to future entrepreneurs. It is important to look to the guidelines carefully crafted by the Community Board when moving forward. The inclusion of provisions limiting the size of retail away from "big-box" stores will be important to maintaining small, local businesses in the neighborhood. We must ensure that those who come to work at the new retail establishments earn a good wage with benefits they can use to help their families. Non-retail commercial development should offer amenities that all residents can enjoy. In addition, those spaces created for new small businesses should be offered at prices per square foot that LES residents and potential small business owners can afford.

Thank you. I look forward to the future of the Seward Park Extension Urban Renewal Area and to working towards a development that meets the needs of this important community.