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Environmental Assessment and Review Division
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Re: Comments on the Draft Scope of Work for Independence Plaza Modifications

To Whom It May Concern:

Please accept my comments below on the proposed Draft Scope of Work (DSOW) for the Environmental Impact Statement (EIS) required as part of the land use application associated with a new development and site plan modification at Independence Plaza (CEQR No. 26DCP143M).

General Comments

CEQR guidelines and site-specific conditions of Independence Plaza

Guidelines established by the CEQR technical manual are constructed to create a framework by which every applicable project in the city can assess any and all potential environmental impacts. Naturally the guidelines are broad, establish loose thresholds based on aggregations of often extremely varied data, and set out expectations for projects that can vary from a minor variance to a citywide zoning change.

Thus, it is crucial that these guidelines be coupled with practical judgment and project-specific conditions to create as complete an analysis of often critical impacts to the wellbeing of local and general populations alike. Impacts are often compounding, and the local context of a project can alter the severity of any given category of impact. In this case, nuanced socioeconomic and environmental conditions can be oversimplified and lost in the base analysis suggested by CEQR. These subtle dynamics can be sifted and assessed with clarity and precision, to ensure that the health, function, and vitality of Independence Plaza and Tribeca are protected.

Impacts to Independence Plaza compared to the established study area

Per CEQR guidelines, direct and indirect impacts within each task are commonly assessed by either immediate project area or by study area. For this project, which is not directly replacing but adding to an existing largescale development, impacts to the existing residences, uses, and

infrastructure within the complex risk being seriously overlooked in what analysis is included in the Final EIS (FEIS).

Subject Comments

TASK 3: Socioeconomic Conditions

The DSOW includes an assessment of indirect residential displacement, however this will only be measured based on the characteristics of the study area as a whole. Seeing as the proposed project is part of a larger development across multiple buildings, it will undoubtedly have a more significant impact on the preexisting residents of Independence Plaza. Further, the existing Independence Plaza development reflects a socioeconomic makeup distinct from the makeup of the study area or the Tribeca neighborhood as a whole. As a historically affordable complex, with a disproportionate number of low- and middle-income seniors as well as voucher holders, an assessment of indirect displacement within Independence Plaza will arguably yield results significantly different from an assessment of the entire study area.

Relatedly, the DSOW does not include an assessment of direct residential displacement because the proposed demolition of 45 existing dwelling units does not meet the CEQR recommended threshold of 500 residents. While it may be true that more than 500 residents may not be directly displaced as part of this proposal, it is also true that, as stated previously, an indirect displacement assessment of the study area would fail to gauge displacement pressure on preexisting Independence Plaza residents specifically. Therefore, whether through the scope of direct or indirect displacement, this impact should be included as part of the FSOW.

TASK 4: Community Facilities and Services

The DSOW states that because no existing community facility would be directly impacted by the proposed project, a direct effects assessment is not warranted. However, the DSOW fails to recognize the Greenwich House senior center located on the second floor of 310 Greenwich Street and directly adjacent to the construction site for the new building. This publicly funded senior center serves thousands of individuals each year through meal services, events, senior and cultural programming, and social services. The only windows of the center directly face the plaza within which the new building is proposed to be erected, and would thus be directly impacted and potentially compromised by the proposed project. Such an impact must trigger a full direct effects assessment.

Regarding indirect impacts, the DSOW includes an assessment of early childhood programs based on the number of low-income units proposed and the guidelines of the CEQR Technical Manual. An assessment of impacts to public schools in the area is not included because the proposed project does not surpass the suggested dwelling unit threshold, however such a large single building in an already heavily residential area would arguably warrant an assessment of

impacts to school capacity in the area with the influx of hundreds of new families with school-age children.

TASK 11: Water and Sewer Infrastructure

The DSOW neglects to address this section, due to the fact that in the Environmental Assessment Statement (EAS) prepared and submitted as part of this application, the proposed project would not meet thresholds of water demand, unit count, or other sewer or water condition. However, the threshold of 1,000 new units in Manhattan is narrowly missed by the proposed 929-unit net increase proposed as part of this project. The threshold drops to 400 units for any project proposed in any outer borough, illustrating a certain bluntness of the relevant CEQR guideline. Water and sewer infrastructure conditions are surely not uniform across Manhattan, and a residential project of this scale should certainly be subject to further analysis of the preexisting water and sewer infrastructure in the area.

One concern, in addition to questions around combined sewer capacity and increased sewer overflow risk, is that of water supply capacity. The area is primarily supplied by the Manhattan section of City Tunnel 3, which has been under construction since 1970. While portions closest to the project area have been completed, current water supply capacity, and the potential need for additional riser shafts connecting to the city's water main system, should be assessed as part of this project.

Conclusion

I have stated several comments related to what I believe is missing from this DSOW. These contribute to a larger, more serious concern for the overall negligence by this owner toward the thousands of existing Independence Plaza residents in favor of this new market rate residential tower. Many residents are seniors and on fixed income, and despite living at Independence Plaza for 50 years, they have been treated as collateral in a long term privatization and gentrification of what was once a stalwart of affordability in Lower Manhattan.

The rationale behind the 13-block urban renewal project that yielded Independence Plaza hinged on affordability and public good. Alongside a community college and public park, Independence Plaza served as an ideal of what planning could accomplish, but today that ideal has deteriorated into a luxury real estate venture whose only beneficiary is its developer. I will continue to advocate for a comprehensive environmental review, and more importantly an affordable, contextual Independence Plaza, and I ask that our city agencies do the same.

Sincerely,

[signature]

Christopher Marte
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