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**Comments on the Draft Scope of Work  
Environmental Impacts Statement for the Department of Sanitation Brookdale  
Garage Building and Adjacent Development Parcels**

**New York State Senator Brad Hoylman  
New York State Assemblymember Brian Kavanagh**

**July 22, 2015**

Thank you for the opportunity to present our comments on the Draft Scope of Work for the Draft Environmental Impact Statement (DEIS) on the Sanitation Garage the New York City Economic Development Corporation (EDC) and the Department of Sanitation (DSNY) are proposing to site east of First Avenue between East 25th and East 26th Street. We would also like to thank Manhattan Community Board 6 (CB6) for the attention and consideration it has given this proposal, as well as Borough President Gale Brewer and Council Members Dan Garodnick and Rosie Mendez.

We strongly encourage DSNY and EDC to continue to work with the community as this process moves forward. It is our hope that EDC and DSNY will respond to all the legitimate questions and concerns raised during the two scoping meetings held over the past month and also provide responses to any questions posed by the community during the 2013 scoping period that have not yet been addressed. More generally, the City should not move forward with this garage unless it can assure that the project will not have adverse impacts that would impose an undue burden on the local community and that the City has fully explored all of the realistic alternative sites that could be utilized to provide the necessary sanitation services to community members.

Specifically, we would like to ensure that answers are provided to the following questions:

**Traffic**

- How would traffic patterns be affected by the increased volume of sanitation trucks driving along First Avenue?

- How many trucks would be traveling streets in Community District 6 (CD6) on a peak day, compared to the number of trucks currently traveling on CD6 streets on a peak day?
- On an average day, what is the estimated length of time DSNY vehicles would spend on streets in CD6? How does this length of time compare to the length of time DSNY vehicles spend on the streets of CD6 currently?
- What is the average distance DSNY vehicles servicing CD6 currently travel in a single day? What distance would DSNY vehicles servicing CD6 be traveling in a single day if the proposed garage is built?
- Could DSNY adjust its parking policy to discourage employees from driving to work when special circumstances do not require them to do so? What percentage of the personnel parking could be removed from the building plan without interfering with DSNY's ability to provide essential services?
- Could DSNY utilize existing local parking options, including those under the FDR, for sanitation personnel who must drive a car to work? What effect would reducing the amount of employee parking have on the size of the building?
- How will traffic studies take into account Bellevue Hospital's emergency bay, which exits onto 26th Street?
- Would the proposed garage's effect on local traffic patterns impact surrounding hospitals' ambulance response times? What steps can DSNY take to minimize any potential effect the proposed garage could have on ambulance service?
- How would the blocking of surrounding streets during the construction period impact traffic flow on the FDR and First Avenue?
- What measure would be taken to mitigate potential risks related to DSNY vehicle traffic to ensure the safety of local drivers, cyclists, and pedestrians?
- Why has the proposed amount of equipment to be assigned to the garage in the 2015 Draft Scoping Document changed from the 2013 Draft Scoping Document, which proposed a garage on the same site to service the same area? What caused DSNY to determine that an additional 29 vehicles, a 19% increase, should be assigned to the site? How can DSNY minimize the number of trucks, especially heavy duty class 8 vehicles, needed to service this area?

### **Air quality and health risks**

- What are the projected daily emissions that would be caused by the equipment assigned to the proposed garage on an average day and on a peak day? How do those projected emissions levels compare with the emissions levels currently caused by the DSNY equipment currently servicing the community districts the proposed garage would cover?

- How do these emissions figures and any net reduction compare to overall figures for vehicle emissions in Manhattan and in the community districts the proposed garage would cover?
- What percentage of the trucks and vehicles housed at this garage would be part of DSNY's "Green Fleet"? What steps can DSNY take to increase this percentage?
- How could DSNY maximize the use of electric vehicles, or other alternatives to diesel-burning vehicles, and minimize the use of diesel-burning vehicles?
- To what extent could DSNY replace or retrofit old vehicles to shift their fleet to the cleanest possible technology?
- What measures would DSNY take to ensure that the proposed garage itself is utilizing environmentally friendly technology, both in its construction and operations?
- What else could DSNY do to ensure the cleanest possible technology would be used?
- What protections would DSNY and EDC provide to reduce any risk to populations vulnerable to illness caused by poor air quality?
- How would DSNY mitigate the potential increase in the concentration of PM2.5 associated with increased traffic emissions in the area that may arise due to the garage? Could DSNY equip its vehicles with appropriate filters to minimize fine particles that enter the atmosphere?
- How would the queuing of trucks behind glass paneling impact the effect of their emissions?
- Would changes in air quality surrounding the site impact neighboring hospitals and schools?
- What measures would be taken to mitigate dust particles during the construction process?
- How could the incorporation of open space, living walls, and additional trees minimize adverse impacts of diminished air quality?

### **Noise**

- Given the proposed site's proximity to several densely populated residential developments, how would noise resulting from hundreds of vehicles leaving and returning to the garage be minimized?
- What would be the projected increase in noise over the current average decibel level in the area when trucks depart from and arrive at the garage?
- How would noise be mitigated during the construction process?

### **Parcels A and B**

- How would air rights not utilized by the garage be distributed onto the parcel sites?
- In a scenario where both Parcel A and B are developed as residential buildings, what percentage of units would the City require developers to make affordable housing? What steps would EDC take to ensure this is the greatest percentage possible?
- How would the percentage of affordable units differ in a scenario where only one of the parcels would be developed for residential use?
- Given that the City has the ability to make the parcels' use of the garage's air rights contingent on the permanent existence of affordable units in those parcels, would the City require permanent affordable units in exchange for unused air rights?
- Should Parcel A, Parcel B, or both parcels be developed as residential buildings, how could EDC encourage the development of housing that addresses the needs of the local community's large senior population?
- Should Parcel A, Parcel B, or both parcels be developed as commercial buildings, how would the retail options be tailored to community needs?

### **Alternative sites**

- What other sites within the Community Districts that would be served by the garage were studied as part of site selection?
- Given the community opposition to this particular site, what other sites have been considered? Why were they not selected? Were factors other than costs considered when ruling out these alternative sites?

### **Additional concerns**

- Could the garage, or some portion of it, be constructed underground to make more use of the aboveground areas by reducing the size of the building?
- How could DSNY and EDC minimize the number of floors needed for the garage?
- Could DSNY and EDC provide open space as part of the project, either by providing public roof access or reducing the footprint of the garage?
- How would the City ensure that the 25th Street pedestrian walkway remains accessible to Waterside residents? How would the City improve this walkway, including its ADA compliance?
- How would the proposed garage and parcels fit into the City's resiliency plan against future super storms or other events?
- What steps will EDC and DSNY take to continue to engage with the community throughout the decision making process?

We look forward to responses to the above questions, as well as responses to community commentary from the June 22nd and July 15th public scoping hearings. Thank you for your attention to our concerns on this important matter.