



## **Gridlock of Downtown Brooklyn Suggests Better Planning Before Rezoning**

Downtown Brooklyn faces one of the greatest development booms in the city's history. It is key to the City's critical strategy to attract and retain businesses. However, unless it's done right, we are inviting self-defeating gridlock, not just of Downtown, but of all the feeder roads. The Board is being asked to make an informed vote based on the DEIS. **Here's what the DEIS tells us:**

- Intolerable delays will occur at a third of the intersections within the narrow DEIS study area. That's based on the effects of 1/20<sup>th</sup> of the auto trips that are likely to occur. And that's because the DEIS examines only a small portion of the 40 million sq. ft. planned for the Downtown Brooklyn area—and just half of the rezoning area—6.7 of the 14 million sq. ft. permitted by the rezoning.
- And then the DEIS cuts back those predictions with insupportable assumptions, e.g., deducting nearly twice as many trips per floor area of buildings that will be displaced as from new buildings.
- The DEIS purports to examine 12 million sq. ft. of new residential, commercial and recreational space already approved or in construction, but, in fact, only 1/3 of the trips show up on traffic maps.
- The DEIS assumes no more effect on Downtown than normal background traffic growth of the 7 million square feet of planned development just outside the study area – Ikea in Red Hook, Lowe's in Gowanus, the film studio in the Brooklyn Navy Yard, to cite just a few. Projects that were announced after the DEIS, like Empire Stores and the Nets Arena, of course, are not included.
- The effects of the low trip volumes in the DEIS are then analyzed with a spreadsheet method that no agency or engineer uses when they need to know how traffic really operates. These simplistic calculations can't reflect spillback or saturation in a corridor like Flatbush Avenue and ignore the City's new computer controlled signals that preclude traffic fixes by adding a few seconds of green time to isolated intersections. Nothing less than an areawide traffic network model should be used.
- Even with all this undercounting, the DEIS concludes unacceptable traffic delay is "unmitigatable" at a third of the intersections. With true volumes, the entire network would breakdown, producing gridlock everywhere—for many hours of the day. Unless there is far more creative planning.
- The impacts on our most crowded subways and sidewalks will be even more severe, but these are not analyzed in the DEIS. So there's no prescription for the MTA to add even one train or bus route.
- Thus, the City is counting on Brooklyn for its premier strategy to keep businesses from straying, but expecting it on the cheap compared to Hudson Yards where the same 40 million sq. ft. is getting 50 times the investment. They're getting a new rail line; we're getting one widened subway stairway.
- The City's Transportation Commissioner has promised a comprehensive transportation plan. CB2 has been pressing for a transportation/land use plan as its highest priority for several years. The Brooklyn Transit Agenda spells out commitments that must be made in the next MTA plan. These must come before, not after, we decide we can double Downtown. Anything less is self-defeating. It is too important to us who live and work here--and to the success of Downtown---not to do it right.
- Not doing it right also jeopardizes the entire programs of the agencies sponsoring the rezoning. U.S. HUD funds 75% of the Dept. of City Planning, virtually all planning at the Economic Development Corporation and the Dept. of Housing Preservation and Development, and CB 2. Unless the DEIS is revised to examine the entire rezoning action, the City cannot certify, as required of HUD fund recipients, that it followed HUD rules specifying that *all related activities must be grouped together in a single environmental review that evaluates the cumulative effects of all components of a multi-year project, regardless of funding sources*. The City's rationale for not doing so is invalid.

***Submitted January 14, 2004 to Community Board 2 by Brian Ketcham, P.E, Community Consulting Services and member of CB2's Traffic & Transportation Committee since 1990.***