



COMMUNITY BOARD NO. 9

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March 17, 2017

Sent Via Certified Mail

Mayor's Office of Environmental Coordination
Attn: Esther Brunner, Deputy Director for Environmental Coordination
253 Broadway, 14th Floor
New York, New York 10007

Sent Via Email:

ebrunner@cityhall.nyc.gov

Reference: CB9 Brooklyn ULURP Committee's comments on the Bedford Union Armory Project's Draft Scope of Work for an Environmental Impact Study: CEQR No.16DME005K

Attn: Esther Brunner:

Prior to the certification of the ULURP process for the project referenced above, the members of the CB9 ULURP Committee have attended approximately 32 Community Group, Stakeholder, Resident and Developers / NYEDC meetings concerning the Bedford Union Armory redevelopment. Based on the feedback of these meetings, the following are comments on this project. As more information becomes available, we reserve the right to amend this document.

Community Vision:

As testimony illustrated at the March 7, 2017 Public Scoping Meeting, the vision for the Armory by the majority of residents is as a "Community Jewel," providing benefits to the residents of the surrounding geographic area. Descriptions of their vision include "Town Square," "State of the Art Recreation/Community Center," "Event Center," "Provide Retail/ Services," "Community Controlled Land Trust," "Safe Haven/Gathering Place," "Community Museum," "Educational," etc.

The Committee received minimal feedback of support for the development of condominiums and market rate apartments, reflected in testimony at the scoping meeting. Concerning the recreation center, the testimony "we don't need a couple of basketball courts" is the tone of the community.

To summarize, the community envisions 100% affordable housing (based on CD9 AMI, not federal guidelines) with a community controlled state of the art recreation facility and Community Town Square.

Disposal of City Property:

The majority of the community has voiced strong disapproval of the sale of President Street portion of the Head House for the construction and sale of condominiums. The financial mechanism selected by the EDC, revenue generated by sales of condominiums to fund the construction of the residential units, is short term thinking when measured against other comparable projects for construction financing. BFC is a major developer that utilizes government and private financing in their projects; they are capable of finding alternative financing.

The scoping document states, that in addition to the sale of condominiums to fund the project, the developers have requested to:

“seek public financing by the New York City Department of Housing Preservation and Development (HPD) and/or the New York City Housing Development Corporation (HDC) to facilitate the Proposed Development.”

The EDC and BFC have repeatedly stated that they need to sell the President Street land to a third party (affiliate of BFC), develop and sell condominiums, which will self fund the project and no public monies will be utilized. This is contrary to the scoping document request. The “double dipping” and misrepresentation at the expense of our community is not acceptable.

Affordable Housing:

Our community has a number of objections to the affordable housing component of Bedford Courts:

1. The percentage of affordable to market rate apartments at 50%, is less than what’s needed in our central Brooklyn community. Residents, Stakeholders and 3 of 4 District 9’s elected officials (Senator Hamilton, Assemblywoman Richardson and Assemblyman Mosley) have called for 100% affordable housing. Council Member Cumbo has stated her support for the project
2. The AMI bands projected for the rental of the affordable housing apartments do not reflect the median income of District 9, approximately \$44,000
3. The strategy of paying an individual stakeholder \$500,000 and a small percentage of revenue sharing dollars to develop an independent, offsite affordable housing program is a distraction, not a solution. Since these monies will be allocated, the community questions why an external solution to affordable housing units is presented versus investing them directly into Bedford Courts to increase the onsite number of affordable units

Indirect Residential Displacement:

Neither the EDC nor BFC has included estimates of residential displacements and the number of housing units subject to rent protection. For a number of reasons, NYC neighborhoods have consistently experienced indirect residential displacement as a result of new development. This area needs to be analyzed thoroughly and addressed.

Zoning Amendments:

At the time of this writing, CB9's ULURP Committee does not have enough information to comment on the request for the requested Zoning Amendments. Comments will be forthcoming as more information is provided.

Job Creation:

The Community is focused on long term job creation, versus temporary jobs created by the construction phase of the project. Based on the Developers "contracting out" the management, service providers selected will be providing a minimum number of new jobs to the community.

Community Space:

By selling off the President Street Head House, the community will be deprived of badly needed community space.

The community views the "pre-leasing" of the Union Street Head House as a "boondoggle" by the developer, rewarding those organizations for their support versus establishing an equitable selection process.

In addition, the community questions why a pool was included in the recreation space's floor plan. The EDC has stated that it was requested during their community meetings, but there seems to be little community support for it. To the contrary, the majority of residents have voiced a need to use the space for multipurpose community activities. A viable swimming alternative is for the community to have access to the existing Medgar Evers pool which is 3 blocks south of the Armory.

Developers Dollar Contribution to Community Benefit:

BFC is contractually obligated to contribute \$1,500,000 per year for 20 years to benefit and support the recreation/community center. By BFC utilizing independent companies and organizations for the management and operation of the facility and these companies deducting expenses/overhead, etc., it's estimated the cash benefit to the community will decrease 30-40%.

Environmental:

Minimal information has been provided to the Community of the environmental challenges associated with the construction and renovation of the facility. Our residents request transparency and input as to what are the environmental issues and how will they be addressed. Some direct questions raised include destroying the character of the building by selling the President Street Head House as well as BFC's non-disclosure of their plan to remove asbestos in the building.

Parking:

BFC's request to reduce their obligation of providing the required number of parking spaces is rejected by the community as It does not address the overall parking needs of the entire project.

The influx of vehicles from 300 new apartments, 80 condominiums, Medgar Evers students and staff, commercial tenants, staffing, and increased transient parking (buses, cars, etc.) created by local schools, sports teams, and community events held at the facility, justifies the need for parking that far exceeds the minimum required.

Transparency:

The committee enters into the record the lack of transparency by the EDC. A minimal amount of requested information has been received, whether requested by residents, the CB9 ULURP Committee, elected officials, or other stakeholders.

Their actions are comparable to a commercial real estate agency representing the developers.

Thank you for this opportunity and please contact us with any questions or comments.

Sincerely,


Michael Liburd
Chair, CB 9 ULURP Committee

cc: Elected officials, ULURP Committee and Full Board