



**RESPONSE OF THE BROOKDALE NEIGHBORHOOD COALITION TO THE DRAFT SCOPE OF WORK  
FOR A DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE  
M6/6A/8 SANITATION GARAGE COMPLEX AND ADJACENT DEVELOPMENT PARCELS  
EAST 25TH STREET, BETWEEN 1ST AVENUE AND FDR DRIVE  
CEQR 13-DOS-007M - MAY, 2015**

**July 22, 2015**

The community in the vicinity of the proposed garage complex and adjacent development parcels on East 25<sup>th</sup> Street opposes the siting and construction of a 447,000 square foot sanitation facility in close proximity to schools, hospitals, and residential complexes. Accordingly, we have formed the Brookdale Neighborhood Coalition comprised of neighborhood organizations that believe the Draft Scope is deficient in its evaluation of the negative impacts, especially on air quality, pedestrian safety, traffic and EMS operations, that a very large sanitation garage and 30 story buildings would have on the character and makeup of the community for which it is being planned.

The concerns expressed by residents at the June 22, 2015 public comment meeting on the Draft Scoping document and in letters submitted to DSNY need to be addressed by the DEIS, as well as those in our response to the Draft Scope, due July 22, 2015. However, we question whether the very serious environmental, health and safety issues we highlight in our response can ever be mitigated at this site. Furthermore, DSNY has not performed due diligence in identifying alternative locations, as required by law.

We request that you **extend the public comment period to 180 days** due to the complexity of the issues and the sensitive community populations that would be affected, including school children, hospital patients, asthmatics and the elderly.

Major concerns include:

**1. Pedestrian Safety**

Pedestrians -- adults and children alike -- would be facing additional and significant risk due to the constant inflow and outflow of this major new concentration of DSNY trucks and vehicles. According to the NYC Department of Administrative Services 2014 Report, **DSNY drivers have the worst accident record of all city agencies**, with 2494 crashes in 2014 and the **highest number of fatalities (4) and injuries (140)**.

The Brookdale "Corridor" runs from the FDR to Second Avenue and from 23<sup>rd</sup> to 36<sup>th</sup> Streets. Per the NYPD Motor Vehicle Collision Report on Manhattan Intersections, May 2015, there were twelve collisions at First Avenue and 23<sup>rd</sup> Street; one collision at First Avenue and 25<sup>th</sup> Street; and four collisions at First Avenue and 26<sup>th</sup> Street -- the proposed vehicular entrance to the garage. According to the Mayor's Vision Zero website, accidents increased in the Brookdale "Corridor" 30% from 2009-2014. This

is clearly a high accident location that must be studied.

Increasing the volume of heavy vehicle trips along this route poses a significant risk to the pedestrians in the area, including the children attending the 9 schools in the area and the large concentration of elderly and infirm utilizing the hospitals nearby. Many schoolchildren traverse 25<sup>th</sup> Street, including the 1400 children who attend the UN International School, the 275 children who attend the British International School and the 500 Waterside children who use it daily to get to school as well. The 4000 residents living at Waterside use East 25<sup>th</sup> Street as their primary means of egress from Waterside. In addition, on 23<sup>rd</sup> Street are located the VA Hospital, United Cerebral Palsy, Xavier School for the Blind, and Associated Blind Housing ;the Churchill School for children with learning disabilities is located on 29<sup>th</sup> Street. There is a high volume of physically-challenged people, using wheelchairs, canes, walkers, and/or seeing eye and assistance dogs in the Brookdale corridor.

Pedestrian studies must be done at peak times on school days during the school year to properly assess the traffic. **This increased risk must be mitigated.**

## **2. Traffic and Gridlock; Impacts on Life Saving Activities and Emergency Response Times**

One of the most critical issues is traffic in the “Brookdale Corridor” which runs from FDR to Second Avenue and from 23<sup>rd</sup> to 36<sup>th</sup> Streets. First Avenue, from 23<sup>rd</sup> Street to the Midtown Tunnel, is jammed most of the time. It is, frankly, a traffic nightmare. The Veterans Administration Hospital, Bellevue Medical Center and NYU Langone on First Avenue between 23<sup>rd</sup> Street and 34<sup>th</sup> Street all need a clear track for life-saving activities.

According to the Mayor’s Environmental and Health Portal, in 2005 the Gramercy-Murray Hill Neighborhood had a Traffic Density of 78.6, more than 300% of the Manhattan average of 24. Since then, traffic congestion has significantly increased, with the Mayor’s Office reporting a 9% decline in traffic speeds in Manhattan, to 8.51mph from 2010 – 2014 and, in 2015, it has fallen to under 8 mph. There has been a 5% decline in MTA rush hour speeds from 2013-2014. At the same time the For Hire Vehicles (FHV) have increased by 25,000 since 2011, with the rate of additions up dramatically this year, averaging 2,000 per month.

**We recommend that traffic conditions, including vehicle counts, congestion and average miles per hour be studied in the Brookdale-impacted “Corridor” noted above, that their impacts on Air Quality, Accidents and Emergency Response Time be technically studied, and strategies for Zero Impact mitigation be developed.** Studies must show peak travel times and congestion, not only 24 hour or 7 day averages.

There are extremely high volumes of emergency vehicles traveling up First Avenue as it provides their ONLY access to NYU/Langone, Bellevue and the Veterans Administration emergency rooms. There are emergency vehicles going to the 30th Street Shelter 24/7:each trip consists of ambulances, police vehicles and fire trucks traveling on First Avenue to 30<sup>th</sup> Street. In addition to the normal First Avenue traffic of cars, trucks and bicycles, these major hospitals are also served by buses, ambulette and taxis. The community insists that Fire Department of New York (FDNY) and its EMS service review the DSNY plans and certify that the additional traffic the garage will bring will not delay life-saving activities. It is key to study the exits out of the demapped 26th Street onto First Avenue and Second Avenue since this is the only exit from for EMS vehicles and for all of Bellevue, Alexandria I and II. The Community wants FDNY and EMS Battalion 8 to review and certify that the plan will not result in reduced EMS response time or slow access to the hospitals.

In addition to the travel demand and traffic analyses to be conducted, in an effort to shorten the route the trucks will take from the East 91<sup>st</sup> Street Marine Transfer Station, the community urges consideration of using 26<sup>th</sup> Street between First and Second Avenues as the return garbage truck route, should the proposed site be chosen. Trucks turning directly on 26<sup>th</sup> Street and crossing First Avenue to enter the garage would save six blocks of travel and save increased amounts of emissions, as well as avoid the already busy 23<sup>rd</sup> Street intersections. Currently, due to bike traffic, left turns onto 23<sup>rd</sup> Street from Second Avenue are delayed by a red/green arrow. Adding DSNY truck traffic will lead to gridlock at this intersection. Even now, making a left turn there frequently requires waiting for two light cycles. However, it should be noted that 26<sup>th</sup> Street runs by a children's playground and the NYU/Langone dormitory.

Since 25<sup>th</sup> Street has been made two-way, there is almost continual backup on the FDR for cars exiting onto 25<sup>th</sup> Street, creating gridlock both on the FDR and at the First Avenue/25<sup>th</sup> St intersection. This adds to the existing First Avenue congestion. Traffic studies n

**We recommend that 25<sup>th</sup> Street once again be one way** since it is planned for all DSNY and employee vehicles to enter on 26<sup>th</sup> Street. This will ease the backup onto the FDR. We ask DSNY to describe the specific circumstances under which the 25<sup>th</sup> Street exit might be utilized for DSNY vehicles and that such use be specified only for emergency situations.

### 3. Air Quality

According to the Mayor's [NYC Environment and Health Data Portal](#), the **10010 zip code has the worst air quality in Manhattan based on several measures**. In the winter 2012-2013, PM2.5 was 17% over the federal standard of 12 and in the summer 2013 it was 11% over. Much research has been done through the years on the health risks of pollutants associated with diesel combustion. Recent research has added to the list of risks that are now known to include cardiovascular disease, stroke, cancer, respiratory disease, diabetes, childhood obesity, reduced lung size of children, inflammatory disease and mylenation of DNA after only a few hours of exposure. The National Institutes of Health National Library of Medicine <http://www.ncbi.nlm.nih.gov/pubmed> lists 3449 articles using the search term "diesel exhaust health."

The City of New York and its Department of Health and Mental Hygiene (DOHMH) recognized the importance of Air Quality on neighborhoods when it established the New York City Community Air Studies (NYCCAS) in 2008 to systematically assess street-level air quality in all of our neighborhoods and to identify the leading sources of neighborhood pollution and inform strategies to reduce them. NYCCAS monitors all of the major air pollutants regulated by the Environmental Protection Agency because of their proven harm to public health. They include: Fine particles (PM2.5), Nitrogen oxides (NOx), Elemental carbon (EC), Metals in particles, Sulfur dioxide (SO<sub>2</sub>), Ozone (O<sub>3</sub>).

DSNY has stated that their vehicles use "clean diesel technology" - ultra low sulfur fuel vehicles that have particulate filters that reduce PM2.5 by 90%. But this still leaves the remaining 10% of pollutants being put into the air. DSNY mentions in its Scope the risk of CO and PM2.5, but does not comment on the known risks of NO<sub>2</sub>, NOx, Ozone and toxins such as benzene and formaldehyde. The community believes that the **additional pollutants that will be released into our neighborhood** from the net additional DSNY vehicles, together with those pollutants from more vehicles idling due to increased congestion, **represent an unacceptable risk**. At a time when Europe is moving to Low Emission Zones in the center city, we are being asked to accept additional heavy diesel vehicles into our neighborhood, even though we have the worst Air Quality in Manhattan. We are extremely concerned about impact on public health that would result from this garage, with its 24/7 operations, 180 vehicles plus the round

trips of 115 employee vehicles. We are further concerned about the toxic vapors emitted from the daily deliveries of fuel to the on-site storage tanks, refueling of the vehicles and venting of the tanks.

The Draft Scope states that “DSNY collection trucks all use advanced clean diesel technology” and are “not a significant source of CO” (carbon monoxide). However CO is not the most dangerous substance. In fact, per NYCCAS, the **byproducts** of diesel combustion: fine particles (PM2.5), nitrogen oxides (NOx), elemental carbon (EC), metals in particles, sulfur dioxide (SO<sub>2</sub>) and ozone (O<sub>3</sub>) are the most dangerous emissions to consider because of the risks they pose to human health. The community insists all of the substances measured in the NYCCAS study be technically studied by DSNY in the DEIS using the NYCCAS methodology in addition to those methodologies currently planned. We further insist that saturation sampling, synchronized with NYCCAS sampling, be done at the site before and during demolition, during construction and after the garage is operational, should it be built at this location.

The Scope states it will technically study CO<sub>2</sub>, PM2.5 and “qualitatively” study NO<sub>2</sub>. **Qualitative studies are not adequate when studying risk to public health. The community insists that technical studies be done of each of the following: CO<sub>2</sub>, PM2.5, NO<sub>2</sub>, SO<sub>2</sub>, OZONE, Benzene & Formaldehyde and the 40 toxins contained in diesel emissions.**

In the FEIS for the Spring Street garage, DSNY stated that based on the vehicle studies done for the Marine Transfer Station, there would be no adverse impacts on air quality. With regard to the DEIS for the Brookdale site, using studies developed for the Marine Transfer Station FEIS in 2005 are not valid. Ten years later more information is now known about the health risks associated with diesel fuel and newer standards are in place. In many cases, the USEPA and NYSDEC standards and guidelines do not reflect the current scientific knowledge of the risk to human health of the many pollutants and toxins resulting from diesel combustion. Furthermore, basing studies for the Brookdale site on those done for MTS is not valid because the MTS location has many different physical characteristics and because the MTS neighborhood does not have the poor Air Quality that that Gramercy Murray Hill does, per the Mayor’s Environment and Health Portal.

**Technical Air Quality Studies - We seriously question whether any mitigation can adequately reduce the increased risk from additional air pollution that would result from the proposed garage.** Because of the proximity of the proposed garage and end parcel buildings to playgrounds, schools, residential complexes and the extensive medical campuses in the immediate vicinity, the community insists that DSNY exceed the study of air quality proposed for the DEIS in the Draft Scope and incorporate the NYCCAS measurement methodology and all of the NYCCAS pollutants studied. The EPA/DEC/DEP guidelines proposed in Draft Scope and associated measurement points are not adequate. The DEC guidelines were developed to ensure compliance with the Clean Air Act and are not adequate to measure the effect on human health in the vicinity of this project. In fact, there are only 25 monitoring sites in the entire city and most of those are on rooftops where they do not measure the air quality experienced by pedestrians.

The Air Quality studies **should be technical**, detailed and thorough, including synchronized (with NYCCAS) saturation sampling at the site, of the impacts of the proposed garage on levels of fine particles (PM2.5), nitrogen oxides (NOx), elemental carbon (EC), metals in particles, sulfur dioxide (SO<sub>2</sub>), ozone (O<sub>3</sub>) and clarification of the mechanisms by which PM2 and NOx form other hazardous substances, to ensure that air quality is not compromised. In addition we want the technical studies to include the 40 toxins contained in diesel and gas emissions. The technical studies should include projections for vehicles associated with the various development scenarios for the end parcels.

Air quality measurements should be taken at street level (per NYCCAS methodology) at the intersections noted in the Draft Scope and that projections of increases in contaminants be done at each of those intersections as well as at the midpoints of 25<sup>th</sup> and 26<sup>th</sup> Streets between the FDR and First Avenue. Because the Veterans Administration is building a 14' wall as a protection against future superstorms, and DSNY is proposing to build a 129 feet tall building with no setback, emissions from vehicles and other sources in the area will not disperse as well as they would without the wall. The mid block air quality and its impacts on pedestrians, especially children and the elderly who will walk this block must be studied.

**About NYCCAS Methodology** - NYCCAS air samples are collected from 150 different locations around the city at street level, where people walk along sidewalks, and where traffic-related pollution is usually higher. Per the NYCCAS FAQ, NYCCAS air samplers are mounted on street-side lampposts 10 to 12 feet off the ground while DEC monitors are located (at about 25 sites around the city) mostly on rooftops at some distance from heavy traffic and other emission sources. Routine DEC monitoring is not designed to compare pollution levels at different locations within the city. Most pollutants are monitored at just a few locations. (<http://www.nyc.gov/html/doh/downloads/pdf/eode/nyccas-faq.pdf>).

### **Health Risks**

PM2.5 often includes hundreds of dangerous chemical elements such as sulfates, ammonium, nitrates, elemental carbon and condensed organic compounds, and even carcinogenic compounds and heavy metals such as arsenic, selenium, cadmium and zinc. [http://www.ucsusa.org/clean\\_vehicles/why-clean-cars/air-pollution-and-health/trucks-buses-and-other-commercial-vehicles/diesel-engines-and-public.html](http://www.ucsusa.org/clean_vehicles/why-clean-cars/air-pollution-and-health/trucks-buses-and-other-commercial-vehicles/diesel-engines-and-public.html) - Solutions Particulate matter contributes to many respiratory, cardiovascular and endocrine diseases through a variety of mechanisms.

Even short-term exposure to PM2.5 over a few hours can trigger myocardial infarctions, cardiac ischemia, arrhythmias, heart failure, stroke, exacerbation of peripheral arterial disease, and sudden death. A recent article in the *Journal of the American College of Cardiology* by Dr. Jonathan Newman studied the cardiovascular impact of PM2.5 and found that inhaling New York City air can block arteries to the brain. In the dirtiest area, Gramercy, the air quality raised the risk of such constriction by nearly 25%. <http://content.onlinejacc.org/article.aspx?articleid=2173083> Diesel exhaust has been classified a potential human carcinogen by the U.S. Environmental Protection Agency (EPA) and the International Agency for Research on Cancer.

Exposures to Nitrogen Dioxide (NO<sub>2</sub>) are linked to increased emergency department visits and hospitalizations for respiratory conditions, particularly asthma. NO<sub>x</sub> reacts with other compounds in the atmosphere to form PM2.5 and ozone (O<sub>3</sub>).

Exposure to diesel fumes has also been shown in recent research to cause changes in the mylenation of DNA in human subjects

[http://www.sciencedaily.com/releases/2015/01/150108100702.htm?utm\\_source=feedburner&utm\\_medium=email&utm\\_campaign=Feed%3A+sciencedaily%2Ftop\\_news%2Ftop\\_technology+%28ScienceDaily%3A+Top+Technology+News%29](http://www.sciencedaily.com/releases/2015/01/150108100702.htm?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+sciencedaily%2Ftop_news%2Ftop_technology+%28ScienceDaily%3A+Top+Technology+News%29)

**These technical studies should be completed prior to any decisions about the location and logistics of the proposed 25<sup>th</sup> Street Brookdale Garage.**

**DEP Review and Certification** - The DEP should review and approve all the air pollution control plans for this site including the unfiltered venting of concentrated emissions from the garage to the roof, the

venting of fuel tanks at the site, vapors emitted into the atmosphere during the refueling of DSNY vehicles and the replenishment of fuel storage tanks by tanker trucks. The studies should include emissions from trucks waiting to enter the garage, idling in the garage and fueling.

In addition, DEP should conduct Air Dispersion model studies that document how emissions are dispersed under varying weather patterns, including inversions. We insist that air vented to the roof be clean of all contaminants. We request that DEP further review and approve plans to store and dispose of fuels and substances associated with cleaning and maintenance of vehicles.

**DOHMH Review and Certification** - The air in our community is already the worst in Manhattan and the location of this garage cannot come at a cost to the health of the residents. We request that the Department of Health and Mental Hygiene specifically review and approve the location of this garage with the associated stationary and new mobile emissions, using NYCCAS data and predictive methodology, given its close proximity to three hospitals and the densely populated residential area and to certify that it will not adversely impact the health of those living in the community.

**Budget for Saturation Studies at Site** -- We further request that DSNY provide budget to the community for a saturation study (8-10 sensors) on the block synchronized with NYCCAS data sampling. The studies should be conducted once as a baseline, once during construction and again after the site is operational. This will enable us to measure the actual impact of this project on air quality.

**Technical Air Quality Studies During Construction** -- The Draft Scope states that only qualitative air studies will be done during construction. We insist that special saturation technical studies, synchronized with NYCCAS data, be done at the site before, during construction and after the garage is operational to ensure Air Quality is maintained or improved. Doing a Qualitative Study of Air Quality during construction is NOT sufficient as demolition and construction will go on for five years and the public cannot be put at unknown risk for that long a duration..

**In view of the already substandard air quality in our neighborhood, the Coalition and the communities it represents wants and plans for DSNY and the parcels to achieve Zero Air Quality Impact.**

#### **4. Land Use and Zoning**

It is not insignificant that a zoning change from R8 to M1-5 is required to allow this project to go ahead. This zoning change would permit manufacturing uses in a neighborhood that was never planned for it, and which all along has been characterized by medium density residential and institutional (primarily medical) use.

Per the City Planning Guidelines and examples, establishing a M1-5 site adjacent to a park is not generally considered good planning. Per the Draft Scope, the study area "...will include portions of the blocks immediately surrounding the project site and land uses within approximately 400 feet." The garage and Parcels A and B have the potential to impact a greater area; therefore, the study area should be increased to include 23<sup>rd</sup> Street to 32<sup>nd</sup> Streets. We also maintain that the zoning proposed for the end parcels of C6-4 is out of scale in terms of its density. It is too extreme and should be zoned C6-2, the commercial equivalent of R8, in keeping with the neighborhood characteristics.

To spot zone and build a 447,000 square foot garage would significantly alter the character of the neighborhood and the community. We contend that spot zoning is impermissible and would not be

consistent with a well-considered plan as required under New York State law.

## **5. Appropriate Size**

The Community emphatically questions why a 447,000 square feet facility is required in this district. The Community insists on full disclosure by DSNY and review by an outside consultant on the size of these facilities. (By way of comparison, the original WTC towers were 1.2 million square feet). The East Side might be better served by two smaller garages rather than a mammoth building with no relation to its neighbors.

## **6. Alternate Sites**

The Draft Scope does not give any meaningful consideration to alternative locations or plans submitted by CB6 and the community. Without looking at possible alternatives, it makes the Brookdale site a foregone conclusion. Nevertheless, CEQR and SEQR require the careful consideration of other public and private sites. The DEIS must be in compliance with these regulations and include a comprehensive, meaningful analysis including economic analyses of other public and private sites in Manhattan Districts 6 and 8, as required by law. Qualitative analyses are NOT sufficient. The sites to be studied include, but not limited to: parcel on 1<sup>st</sup> Avenue from 38<sup>th</sup> to 41<sup>st</sup>, the parcel on First Avenue at 36<sup>th</sup> Street, the parcel on 30<sup>th</sup> Street and FDR (for a smaller garage) and St. Vartan's Park. DSNY should include in its meaningful review the plans submitted by the Community Board. It is noted that the permits for the Solo site on First Avenue expired at the end of 2013. We ask that that you give special consideration to having 2 garages, one for District 6 and one for District 8. For District 8, we would suggest converting the incinerator located at 215<sup>th</sup> Street where District 8 vehicles currently park outside. For District 6 we would suggest converting Pier 36 for use as a garage.

## **7. Storage of Garbage in Garage**

Initially, the community was told that the proposed garage would be just for vehicle parking, fueling, cleaning and maintenance and that trucks would unload their collections prior to returning to the Brookdale garage. However, in their June 22, 2015 presentation, DSNY said while there would be no overnight storage, some trucks from one shift might return to the garage with a full load which would not be dumped until the next shift. In the DEIS for the DSNY garage on West Street, it states that 12 (20%) of trucks would return to the garage with full loads. According to a 2014 report by the Citizen's Budget Commission, between 29 and 40% of garbage trucks in our area return to the garage at the end of shift without dumping their loads. It is a fair assumption that a similar percentage of trucks loaded trucks at the Brookdale site will pose a health risk, attract vermin and emit odors. This is unacceptable. **The community insists that DSNY adhere to its earlier commitment that only empty collections trucks would return to the garage.** In any case, mechanisms to mitigate health risk and control vermin and odors must be studied as part of the DEIS.

## **8. Geotechnical Considerations**

There is no mention in the Draft Scope of performing a geotechnical analysis to determine the physical properties of soil and rock at the site, even though the proposed garage is being built in a Zone A Flood Plain. There is no mention of vibration analysis to study impact of construction on nearby buildings that include several hospitals, schools and residential complexes.

The Waterside Plaza apartment complex and the United Nations International School (UNIS) are built on a pile foundation system. According to engineers, these existing pile foundations sit on intermediate rock; the piles are not socketed into bedrock. Given that the proposed garage is built on a Zone A Flood Plain, what type of foundation system will be built at this location and will this construction have an adverse effect on the pile foundation systems at Waterside and UNIS and other existing building

foundations? Will there be a process to monitor the surrounding structures during this foundation work and other major construction operations? Will the foundation work for the proposed garage have an adverse effect on existing foundations?

### **9. Explosion and Environmental Risk Posed by Fuel Tanks and Daily Refueling**

The impacts of an explosion or fire from the fuel stored on the premises, whether from accidental or criminal origin, must be quantified. How would a fire/explosion affect the ability to provide trauma and other care at Bellevue and the neighboring hospitals? What would be the effect of an explosion on the evidence stored at the DNA laboratory, which is just across the street on 26th Street, to the schoolchildren at the UN International School and the British International School and to the residents of Waterside and East Midtown Plaza?

In addition, this fire/explosion risk may present special security concerns to the UN International School as the Secretary General of the United Nations is a frequent visitor to UNIS. **A trip to the Sanitation Garage on West 57th Street one evening recently found the doors wide open and no security whatsoever in sight.** The community recommends that NYPD, the US Department of Homeland Security Agency, the Diplomatic Security Service and United Nations Department of Safety and Security should review and certify any plans regarding refueling, fuel replenishment and fuel storage at this site.

### **10. Water & Sewer**

The community recommends that you study and delineate whether the proposed garage and parcels will diminish water pressure supplied to Waterside Plaza, noting planned buildings are 1/2 block from the terminus of the water distribution system. Specify the amount of water to be drawn from the system and amount to be added to sewer system, given the new impervious ground cover. Confirm that it will not overload the system. Specify the number and frequency of vehicle washing and water to be drawn from area fire hydrants to for mechanical broom tanks.

### **11. Trees and Local Ecosystem**

The plan calls for removing from the Brookdale campus 59 large trees estimated to be 50 years old or older. They have large leaf canopies that mitigate pollution in the area and are home to dozens of bird and tree animal species. The Community recommends that a technical study be done of the impact of removing these trees on air quality, the resident species and local ecosystem and that equivalent replacement/ mitigation strategies be developed. It is noted that trees shown on the DSNY design have extremely small canopies and will be limited in growth due to species and building design.

### **12. Marine Ecology**

What impact will the Reasonable Worst Case Development Scenario have on the marine ecology of the East River?

### **13. Office of the Chief Medical Examiner**

The planned new buildings will share the 26<sup>th</sup> Street roadway between the FDR and First Avenue with the **Office of the Chief Medical Examiner** (OCME). Currently, this roadway is used by OCME for the staging of numerous vehicles. The community asks that OCME review and certify that the planned new buildings will not compromise OCME activities. It is noted that DSNY did not provide notice to OCME of the Draft Scope.

### **14. Noise**

We request that DOHMH review and certify the plan and confirm there will be ZERO IMPACT on noise from mobile and stationary sources. The area consists primarily of residential buildings and hospitals; operating a 24/7 heavy diesel vehicle garage conflicts with the neighborhood. .

### **15. School Capacity, Social, Medical and Mental Health Services**

What impacts are expected on **school capacity, social, medical and mental health services**? What are proposed mitigations? (I think we need to be more specific. What other impacts would there be in addition to the air quality, traffic, noise, pedestrian safety, etc., that we have outlined above.

### **16. CB Six Open Park Space Among the Lowest in the City**

NYC Law §203(a)(2) requires “the fair distribution among communities of the burdens and **benefits** associated with city facilities, consistent with community needs for services and efficient and cost effective delivery of services and with due regard for the social and economic impacts of such facilities upon the areas surrounding the sites.” *[Emphasis added]*

Community District Six has the second least amount of open and recreational space of any community district in the five boroughs. The current DSNY-EDC proposal does not include any open or recreational space. We believe that an alternate site for the DSNY garage, within Districts Six or Eight, would permit the 6.5 acre Brookdale parcel to be either bifurcated between development and open/recreational space; or, alternatively, to be developed in its entirety as open and recreational space. This is the first (and perhaps the last) opportunity in generations to provide Community District Six with open and recreational space that more closely approximates its “fair share,” as required by NYC Law §203(a)(2).

In conclusion, the insertion of a sanitation garage into an R8 zone will seriously impact the surrounding communities. **The 24 hours operation of incoming and outgoing trucks would be a noise hazard and extremely dangerous to pedestrians and street traffic. The emission of toxins pose life-threatening dangers to the health, safety and security of the residents.**

The Brookdale Neighborhood Coalition believes that the implementation of the studies, measures and measurements that we have described above are necessary for a well considered DEIS.

Janet Handal	President	Waterside Tenants Association
Susan Steinberg	President	Peter Cooper Village Stuyvesant Town Tenants Association
Eleanor Goldman	Chair	East Midtown Plaza Corporation
Lisa Denby	Chair	305 East 24 <sup>th</sup> Street Corporation
Karen Lee	Chair	Kips Bay Neighborhood Association
Arlene Harrison	President	The Gramercy Park Block Association
Gerard Schriffen	President	The Rose Hill Community Organization
Francisco Di Blasi	President	The Tracy Tenants Corporation