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I'm George Janes, the Executive Director of the Environmental Simulation Center. The ESC is a not-for-profit organization that specializes in applying technology to planning and design problems. To be clear, we are not an advocacy organization and we take no position on the appropriateness of the General Project Plan for Brooklyn Bridge Park.

We have been asked to examine the Draft Environmental Impact Statement on issues of workmanship, completeness, and consistency. An Environmental Impact Statement is a disclosure document designed to inform the public of the impacts of a proposed action. All of our comments speak to how well the DEIS discloses the impacts of the action.

Our most material comments concern Historic Architectural and Visual Resources (in Chapters 7 and 8). The study areas are small, and the method of analysis and determination of significance of impacts is not standard in an action of this size or location.

The applicant cannot merely assert that their action does not cause an impact, as they do in the DEIS, but rather must present evidence supporting its claims. For an action of this size, Applicants typically perform visual simulations as a way of demonstrating impact and most Lead Agencies write such requirements into the Scoping Document.

This DEIS is notable for its lack of such simulations.

To be clear, the DEIS as written largely meets the requirement of the Scoping Document. There is no requirement for visual simulations in the Scoping Document, though there have been few, if any, recent EISs describing a major action in a coastal zone that have not included them.

We speculate that the omission in the Scoping Document was an oversight due to the change in the built form of the action between the Draft Scoping Document and the Final Scoping Document. The Draft Scoping document was for an action that removed the existing sheds and impacts on visual resources could have been conceived as inconsequential. The plan now includes several large buildings including a 30-story tower, an action that clearly has the potential to impact visual resources.

The Applicant is free to do more than the minimum requirements of the Scoping Document and we suggest that the Final EIS, or supplemental DEIS, include visual simulations in the interest of disclosing the impacts of the action to the public.

In conclusion, the Applicant and the Lead Agency are one in the same organization. By including visual simulations the Lead Agency will demonstrate that they are holding the applicant to the same standards that virtually every private developer is held by Lead Agencies.

We will be submitting written findings, which include verifiable visual simulations within 30 days. Thank you.