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**Official Response from Bronx Borough President Ruben Diaz Jr.
Regarding Kingsbridge Armory Developer's FEIS Retort to His Concerns**

Since I voted not to support Related's proposal for the Kingsbridge Armory, a spotlight has been put on the project not only for its lack of commitment to its potential employees, but the inadequate analysis done in the Draft Environmental Impact Statement (DEIS) and Final Environmental Impact Statement (FEIS). Many conclusions related to socioeconomic concerns, traffic, and transit, were improperly conducted or simply fall short of real anticipated impact in DEIS, and were not revisited in the FEIS.

This is not the first time City and its consultants have skirted proper analysis on major development projects it promotes. Whether this is intentional or indolent, it is nonetheless disturbing. For this project, comparative analyses were done with other projects that are nothing like the Kingsbridge Armory or do not exist. This comparative approach has become status quo with how the City conducts its Environmental Assessment and Impact Statements, and unprofessionally shortchanges the true impact large-scale projects have on communities. Below I expand on the comments I made in my recommendation to highlight the inadequacies put forth in the DEIS and FEIS.

1. No Market Study Conducted

Section 3-24 of the DEIS and FEIS (Socioeconomic Conditions) states:

"It is not possible to know exactly who (residents or non-residents) is spending money in the area. This is particularly true for employment-intensive areas such as Fordham Road where a large portion of shoppers do not live, but rather work in the area."

While it is true that Fordham Road is one of the busiest shopping districts in the City, this should have no bearing on gathering information as to who shops there. Fordham Road, as does many other retail centers, has a Business Improvement District, which conduct regular surveys, and develop marketing strategies for both existing businesses and with the hope of drawing additional business that cater to the needs of the community and its visitors. In saying this, how does Related intend to determine what businesses are appropriate for the Armory without doing a market study? Who is their target audience? How can they assure the success of these businesses? Companies across the world spend thousands of dollars to market studies to assure success of their business and/or clients. What makes the Armory site different?

2. Inadequate Analysis of River Plaza

River Plaza is acknowledged in the DEIS, but simply acknowledged and lumped in with the Broadway/Marble Hill retail corridor. River Plaza is uniquely situated serving The Bronx, much of Manhattan above 59th Street and Yonkers. Before the Gateway Center at Bronx Terminal Market was developed, River Plaza was the largest retail development since Bay Plaza was constructed in the 1980's. Broadway, East 225th, 231st and 238th Streets are smaller scale retail strips serving those specific portions of Marble Hill and Kingsbridge. A standalone analysis needs to be conducted, given that it is the most comparable development to the Kingsbridge Armory in the vicinity.

3. Improper Traffic Comparison Analysis

The DEIS traffic and parking analysis was conducted by comparing the Kingsbridge Armory to projects at Willets Point in Flushing and Plaza at The HUB. These comparisons were wholly inappropriate. The FEIS response is that both neighborhoods around each project is similar to the neighborhood around the Armory.

- a. Willets Point is an area containing a number of auto repair shops, manufacturing, as well as the new Citi Field and associated parking. The current road network is extremely dilapidated due to industrial truck traffic. It is situated along Flushing Bay bound by the Whitestone and Van Wyck Expressways, and the Willets Point train yards just north of Flushing Meadows-Corona Park. Though it has access via the IRT 7 and LIRR trains, it is isolated from residential and commercial neighborhoods in Flushing and Corona. These stations are primarily used during New York Mets home games, the U.S. Open, and for Parks Department employees, nothing resembling the steady foot traffic on Kingsbridge Road.
- b. The Plaza at The HUB was a 12-story office/retail complex planned for East 149th Street and Bergen Avenue. While the neighborhood is similar to Kingsbridge Heights and Fordham Road, the project was never built, and based its projections on the economy at the turn of the century, not the current environment we live in.

These comparisons have resulted in a number of no significant impact determinations that do not adequately compare as they have completely different modal splits, local vehicle load capacities and access to highways. A better comparison would have been to River Plaza down the road from the Kingsbridge Armory, with similar access to highways & public transit, and demographics.

4. University Avenue and West Kingsbridge Road

The Level of Service (LOS) rating for this intersection went from "C" to "F" and was determined immitigable. The delay increased from approximately 47 seconds to an unspecified amount of 120+ seconds. I find it doubtful that this intersection, where both University and Kingsbridge are four lanes, will see more than tripling in traffic patterns. Part of this reasoning may be as a result of access as a conduit to the Major Deegan Expressway exits of Fordham Road and West 230th Street. Even if this was the reasoning for a traffic increase at this intersection, the amount of increase is astronomical, and furthermore does not take into account traffic coming from the Van Cortlandt Park South exit to the north, which I will discuss in my next point.

5. No Impact Analysis for Van Cortlandt Park South

Van Cortlandt Park South is a road leading from the Major Deegan Expressway to Mosholu Parkway that is located northwest of the Armory. The exit at the Major Deegan Expressway, as well as major intersections at Bailey and Sedgwick Avenues were not considered in the traffic study. Van Cortlandt Park South is an important exit, which filters drivers to the New York Botanical Garden, Bronx Zoo and Fordham University, all of which are a farther distance from

the exit than the Kingsbridge Armory. The road also crosses Goulden Avenue, a more than one mile stretch that only contains two traffic lights and ends at West 195th Street, where it meets Reservoir Avenue at the northside of the Armory. Drivers from the north will undoubtedly use this exit, given the extended, almost uninterrupted stretch of road leading to the Armory. This would take significant traffic from the Fordham Road and West 230th Street exits, and needs to be analyzed. To point the finger at this office, inferring that we limited the expansion of analysis to a ½ mile radius, while we were simply suggesting expansion of the overall scope, is ludicrous. Part of the reason a group conducts a Draft EIS is to give opportunities for mistakes to be corrected, as well as flexibility. Revelation of this realistic option should behoove the analyst to consider all options, as opposed dismissing it based on predisposed limitations. Ignoring an elephant in the room simply does not make it go away.

6. No Analysis for BX1 and BX2 buses

After clearly stating this omission in my comments for the DEIS, an analysis of BX1 and BX2 service along the Grand Concourse is still entirely missing. The maps in the FEIS do not even acknowledge the existence of these buses, which lie well within the ¼ mile catchment area. I cannot understand why AKRF chooses to ignore two of the most heavily used buses in the borough and the impact the Armory will have on service. These lines run along the most well-known street in the borough and provide a crucial north-south link, particularly for elderly and disabled residents. It is appalling that these buses are ignored in the FEIS.

Additionally, AKRF's response that no one will use the BX1 and BX2 is mired in fantasy. That Bronxites would be unwilling to walk three blocks to the Armory, which is being proposed as this commercial beacon for the borough, is insulting. Furthermore, the IND D train is located at the same spot where the BX1 and BX2 stop, which is three blocks from the Armory. The suggestion of the BX28 and BX32 buses as alternative options, are unrealistic. First, the BX28 is primarily an east-west bus that travels along Gun Hill Road and only sometimes extends to Kingsbridge and Fordham Roads, terminating many times at East 206th Street in Norwood. Also, the route of BX28 is circuitous below Norwood, providing a lengthier trip than either the BX1 or BX2. Finally, the BX32 only travels south, and does not go north of Kingsbridge Road/West 195th Street. The BX1 and BX2 buses provide access to almost the entire Grand Concourse, Riverdale, Kingsbridge, Norwood, Bedford Park, Mott Haven, Melrose and The HUB, making it one of the busiest in the borough.

7. Relocation of the BX9 stop

While results based on CEQR methodology for the BX9 stop at East Kingsbridge Road and Jerome Avenue may be valid, the reality due to increased traffic and the presence of a tricky underpass will result in backups as far back as the Grand Concourse. Already there are traffic tie-ups due to bus bunching. The increase in vehicular, transit and pedestrian activity will surely result in increased backups. A simple solution is to relocate the BX9 stop in front of the Armory itself.

8. Parking Fees

The biggest problem I have heard about Related's Gateway Center at Bronx Terminal Market project is that there is a charge for parking, or at least no option for validation. Patrons of both the Bronx Terminal Market and Kingsbridge Armory should not have to pay for parking, as this will simply induce people to drive to the suburbs for free parking and lower sales tax. While I can understand that Related wants to capture some of the Yankee overflow, charging for parking

at the Kingsbridge Armory is entirely unnecessary, and will place a burden on Bronxites who drive. There is no reason why there cannot be parking validation available to patrons.

9. **Parking Spaces**

While I understand that AKRF conducted a “conservative” estimate of parking, and the hope is that the garage will never reach capacity due to public transit and pedestrian means of conveyance, the worst case scenario option of having patrons park on local streets will be a significant burden to the community. Also, making people walk along the desolate stretch of Goulden Avenue from Bedford Park Boulevard between a reservoir and an elevated park for almost a mile does not provide the reassurance of safety one expects will shopping at a major retail facility.