



## Community Board 12 - Manhattan Washington Heights & Inwood

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Shahabuddeen A. Ally, Esq., Chairperson  
Ebenezer Smith, District Manager

April 26, 2018

Hon. Marisa Lago, Chairperson  
NYC Planning Commission  
120 Broadway, 31<sup>st</sup> Floor  
New York, NY 10271

### **Resolution Commenting on Land Use, Urban Design and Planning Aspects of the Draft Environmental Impact Statement Prepared For the Proposed Inwood Rezoning ULURP Applications**

Dear Chairperson Lago:

At the General Meeting, Tuesday, April 24, 2018 Community Board 12 Manhattan, passed the following resolution with a vote of 29 in favor, 0 opposed, 0 abstention, 1 not voting.

Whereas: The NYC Economic Development Corporation ("EDC") together with the Department of Housing Preservation and Development ("HPD"), the Department of Citywide Administrative Services ("DCAS"), the Department of Parks and Recreation ("NYC Parks"), and the Department of Small Business Services ("SBS") are proposing a series of land use actions to advance the Mayor's Housing New York: Five-Borough Ten-Year Plan and to implement the Inwood NYC Action Plan. The proposed land use actions (the "Proposed Actions") are outlined in Uniform Land Use Review Procedure ("ULURP") Application numbers 180073MMM, 18204ZMM, 180205 ZRM, 180206 PPM, 180207 PQM and 180208 HAM (the "ULURP Applications"); and

Whereas: Environmental review, known as the City Environmental Quality Review process ("CEQR"), is an essential part of the planning process. CEQR is the City's process for identifying the potential effects a set of proposed land use actions may have on the environment. The City has completed a Draft Environmental Impact Statement ("DEIS") for the ULURP Applications. The DEIS was released for review and comment in January 2018, simultaneous with release of the ULURP Applications. The City Planning Commission ("CPC") will hold a public hearing in May 2018 to obtain comment on the DEIS; and

Whereas: The DEIS includes 25 chapters that assess a wide range of environmental planning considerations and identifying potential impacts, alternatives and mitigation, and unavoidable adverse impacts. Committees of Community Board 12-Manhattan have reviewed chapters of the DEIS are pertinent to their areas of responsibility.

Whereas: At the April 4, 2018 meeting of the Land Use Committee ("Land Use" of the "Committee") Dina Rybak of the New York City Economic Development Corporation ("NYCEDC") made a presentation on the Neighborhood Character, Historic and Cultural Resources and Urban and Visual Resources chapters of the DEIS as requested by Committee Chair Benjamin; and


Whereas: At the conclusion of Ms. Rkbak's presentation and after discussion the Committee several key land use and planning concerns with respect to the DEIS. Now, therefore it

Resolved: Community Board 12-Manhattan provides the following comments concerning the land use and planning aspects of the DEIS for the Inwood Rezoning ULURP Applications; calls upon the Office of the Mayor for Housing & Economic e Development, as Lead Agency for the DEIS, ensure that these short-comings are corrected through the execution of supplemental studies prior to the finalization of the EIS; and calls upon City Council member Rodriguez and Borough President Brewer to take such actions as are necessary to ensure that the requested supplemental studies are performed.

1. LPC provided guidance and direction with respect to what the DEIS should analyze with respect to historic resources, but LPC did not include in its guidance and direction consideration of the impacts on the rezoning on the potential historic districts and other potential historic resources that CB12M has advocated for LPC to consider. A supplemental study should be undertaken to correct this in the course of preparing the final EIS.
2. Neighborhood Character, as defined by the CEQR Technical Manual, misses the architectural and urban design nuances that collectively create the sense of place that actually defines neighborhood character. In the course of preparing the final EIS supplemental urban design studies are required to accurately define the neighborhood character of the area subject to the rezoning and then assess impacts on neighborhood character, understanding that for the purpose on an EIS change in and of itself is not considered an adverse impact.
3. A more realistic definition of the elements that are considered as "character defining". The role that architecture, scale, parks and open space, and topography play in defining the built form that characterizes Inwood must be carefully considered and impacts on same assessed in the preparation of the final EIS.
4. The potential impacts of a significant increase in density must be assessed as an impact on Neighborhood Character.
5. Studies from additional vantage points in the community are required to assess potential impacts on view corridors to the Cloisters.

The City must undertake concerted research and efforts beyond the thresholds required by the CEQR Technical Manual to identify areas sensitivity and interest with respect to Native American and African history and legacy and ensure that the assessment of archeological resources fully review and consider impacts on same, without regard for the extent to which these site may already have been disturbed.

Sincerely,



Shahabuddeen A. Ally, Esq.  
Chairperson

cc: Hon. Bill de Blasio, Mayor  
Hon. Gale Brewer, Manhattan Borough President  
Hon. Scott M. Stringer, Comptroller  
Hon. Letitia James, Public Advocate  
Hon. Adriano Espaillat, Congressman  
Hon. Brian Benjamin, State Senator  
Hon. Marisol Alcantara, State Senator

Hon. Alfred Taylor, Assembly Member  
Hon. Carmen De La Rosa, Assembly Member  
Hon. Ydanis Rodriguez, Council Member  
Hon. Mark Levine, Council Member  
Hon. Edith Hsueh, Director NYC Planning  
Hon. James Patchet, President, NYC EDC  
Charlie Samboy, NYC EDC

