



THE CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD 3
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Alysha Lewis-Coleman, Board Chair

Susan Stetzer, District Manager

September 27, 2018

Cynthia Brann, Commissioner
New York City Department of Correction
75-20 Astoria Boulevard
East Elmhurst, NY 11370

Dear Commissioner Brann,

At its September 2018 monthly meeting, Community Board #3 passed the following resolution:

VOTE: CB 3 Comments on Draft Scope of Work for Proposed Borough-Based Jail System and Manhattan Detention Facility

WHEREAS, CB 3 believes that the closure of Rikers Island and corresponding criminal justice reform is necessary; and

WHEREAS, the City of New York through the Department of Corrections (DOC) is proposing to implement a borough-based jail system as part of a larger commitment to close the jails at the Rikers Island Correctional Facility and create a modern and humane justice system; and

WHEREAS, part of this plan includes the development of a new detention facility for the borough of Manhattan at 80 Centre Street, located in Manhattan Community District 1 and just adjacent to Manhattan Community District 3; and

WHEREAS, the proposed Manhattan detention facility would require a number of actions that are subject to the City's Uniform Land Use Review Procedures (ULURP) and has the potential to result in significant adverse environmental impacts that will be disclosed in a forthcoming Draft Environmental Impact Statement (DEIS); and

WHEREAS, the scope of that environmental review is being determined at this time, and Community Boards 1 and 3 conducted a joint meeting to consider this issue on September 6, 2018; and

WHEREAS, at this meeting, the City of New York presented the details of the draft scope of work for the proposed Manhattan detention facility, and comments were heard from members of the public;

THEREFORE BE IT RESOLVED, Community Board 3 believes the following should be considered in the Final Scope of Work and Draft Environmental Impact Statement for the New York City Borough-Based Jail System:

- Evaluate a scenario where the anticipated decrease in crime and jail population does not occur, or the opposite occurs and New York City jail population increases.
- Address why the proposed four facilities would undergo one ULURP rather than individual review processes than could more thoroughly study local impacts.
- Evaluate a scenario where there is a continued decrease in need for beds and beds can be taken off line and replaced with services.
- Evaluate a scenario in which jail population is not evenly distributed with 1500-bed facilities at each borough site, including scenarios with fewer beds at the proposed Manhattan facility (such as an 1100-bed facility).
- Address the absence of a Staten Island facility and evaluate alternative scenarios that include detention facilities in all five boroughs.
- Evaluate public policy and any other criminal justice reform tools that could contribute to the closure of the Rikers Island Detention Facility without requiring all or part of the proposed actions in lower Manhattan.
- There is approximately 20,000 gross square feet (gsf) of community facility space being proposed for the Manhattan detention facility. Please address how this number was determined and why this cannot be a larger figure, and why additional use groups that would provide community benefit, such as affordable and senior housing, were not included.
- The proposed action would locate one level of parking below the new Manhattan detention facility. Please address why this cannot be two or more levels, including confirmation of residents reports of a subterranean river at the proposed site and any inspection and environmental review that would be included if there is a waterway at this location.
- Address how the land on Rikers Island and the decommissioned Rikers Island Correctional Facility will be maintained for public use and identify a method to make this commitment.
- Investigate and address any safety issues in the project study area that have occurred in past ten years due to the existing Manhattan Detention Complex at 124 White Street and 125 White Street, and address how any increased safety concerns as a result of doubling the number of beds and jail population in the area will be mitigated.
- Address how a doubling of staff needed for the proposed new Manhattan detention facility will impact parking and traffic problems, including the identification of mitigations.
- Address how parking concerns will be mitigated, including excessive placard parking from court employees in the study area currently.
- Study the impacts of traffic patterns that would be generated by the demapping of Hogan Place, particularly on the streets surrounding Columbus Park.
- Address how retaining the current façade at 80 Centre St to mitigate historical significance will impact programming by restricting design and how it will impact creation of one or two levels of underground parking.

- Study the impact that façade preservation or other historic preservation would have on the potential future uses of 80 Centre Street.
- Evaluate scenarios that will link the Manhattan detention facility to the community such as changing the staff lunch periods to one hour instead of a half hour so that they could patronize local businesses.
- The study area is limited to 400 feet around the proposed facility. It is certain that some of relocation and environmental impacts will occur outside of the 400 feet study radius, therefore, please expand the study area radius to an appropriate distance and address why the proposed study area is not wider.
- Evaluate any and all reasonable alternative sites within ¼ quarter mile of the current court complex.
- Address why 125 White Street was no longer included in the re-design plans.
- Evaluate an alternative scenario where the detention facility is located within a renovated and reconstructed 125 White Street complex.
- Address specifically how any identified construction impacts will be mitigated and commit to interagency coordination, including area stakeholders, as well as mitigation that will incorporate a multi-agency command center.
- Address how construction staging on Worth Street will impact three funeral homes and any other local businesses, and identify how these impacts will be mitigated.
- Address the historic and cultural significance of 80 Centre Street in the context of its eligibility for National Register of Historic Places and any eligibility for New York City landmark designation, as well as any eligible sites in the designated study area, including preservation considerations.
- Address the impact of the proposed design-build process, including the role and opportunity for community engagement, public review, and participation in the entire process including RFP, design, construction and initial operations.
- Address the impact of a proposed building that would be 40-stories, and evaluate alternative scenarios with shorter building proposals.
- Address the impacts on small businesses after build out as well as during the construction period.
- Address the impacts the proposed actions would have on the function and use of government offices and facilities, including the impacts on the Manhattan District Attorney's Office cybercrime lab and informational technology infrastructure and tourism associated with the New York City Marriage Bureau, as well as the impacts of the displacement of these government offices on the surrounding community and local economy.

THEREFORE BE IT FURTHER RESOLVED, Community Board 3 requests that related developments that the proposed actions would facilitate also be considered at this time, including any and all related community benefits and the potential redevelopment of vacated sites for community uses, including a commitment to using community and stakeholder input provided from a process of engagement for any visioning and planning for the future of these sites, and a timeline be provided for the earliest possible implementation of the process.

Sincerely,



Alysha Lewis-Coleman,
Chair, Community Board 3



David Crane,
Chair, Transportation & Public Safety Committee



MyPhuong Chung,
Chair, Land Use, Zoning, Public & Private Housing Committee

cc: Howard Fiedler, Department of Correction
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