

Hello Marie,

Thank you for allowing me until today to get you these notes. I waited to try and have a quorum for what should have been the 2nd of 2 meetings on JPROx but that was not able to happen. What you'll see are consensus points from our first (and only) meeting.

Firstly, I'd like to state our total support and participation in the creation of the Small Business Displacement position paper created by a small coalition of small business stakeholders including JPNDC, JP Local First and City Life / Vida Urbana. I want to express gratitude towards the more than warm reception given to our recommendations and look forward to working with appropriate City staff to move those recommendations forward.

I've categorized the comments from ESMS under the three appropriate categories we covered: Zoning, Transportation and Parking.

Zoning

The plan proposes heights of 55' for the noncommercial districts from Montebello Road to Columbus Avenue. While we feel that additional height (up to 65') along this corridor could be accommodated on certain parcels with careful design, we recognize the concerns of residential abutters and accept the proposed height as an appropriate compromise. However, there are other areas where additional height can be allowed with minimal impacts on abutting residents. Specifically, **we recommend that the section of the Egleston Square NS district along the east side of Washington Street between Columbus and Westminster Ave (including Egleston Center, Rent-a-Center, and Laundromax) should be added to the 65' subzone of the proposed RDA.** These properties have few immediate residential abutters and the area is large enough to permit substantial height.

We would make the same case for the light industrial areas located between Amory Street and the Orange Line, between Stony Brook T and Atherton Street. These properties have few residential abutters and could accommodate substantial height. **We recommend a 65' height limit for those properties as well.**

We note approvingly that the proposed RDA along Amory Street across from the Brewery excludes the small complex at 243-253 Amory Street, which includes a variety of small businesses. This property provides affordable and flexible space for innovative businesses, and should be protected from residential redevelopment. While the plan does exclude this area from the RDA, it makes no mention of updating the zoning to accommodate current or desired uses, which include retail, restaurant, personal services, studios, and "maker" spaces. **The plan should suggest an update to the base zoning in this subdistrict so that new innovative and desirable uses are not required to secure a variance.**

We also **suggest that the BRA consider excluding other light industrial areas from the RDA designation** so that they can continue to serve as flexible, low-rent spaces for small businesses and artists, without the threat of residential conversion. **Specifically, the properties at 116 to 128 Brookside currently contain a variety of studio and light industrial spaces likely to be displaced if residential development is permitted. We suggest that the RDA overlay be adjusted to exclude these properties.**

We would also add the building directly abutting the Egleston Square Peace Garden at 100 School Street (parcel #1101327000).

The inclusion of the Brewery Small Business complex as a proposed RDA is baffling, given the tremendous amount of economic activity going on at that location. It is also strange that the plan does not propose changing the base zoning for the JP Cohousing, Amory Street lofts, or Brookside artist studios from LI to residential or live/work to reflect current uses, as is proposed for other LI areas that are seeing residential or mixed-use development.

Note: Your most updated map has a number of lots with public spaces or public resources within the RDA. Further conversations with BPDA staff has confirmed that this might have been an oversight when creating the map. We will list these for your consideration for correction:

- Egleston Fire Station (1870 Columbus Avenue – Parcel #1100946001)
- “Stonehenge” (Columbus Avenue – Parcel #1101013000)
- Egleston Plaza (2 Atherton Street – Parcel #1101279000)
- Egleston Square Peace Garden (Washington Street – Parcel #1101328000)

Parking

The Plan JP/ROX study area has some of the best multimodal accessibility in the region and is a location where car-free living can be a reality for many different kinds of households. The plan should be structured to encourage development that will attract residents and shoppers who will utilize the area’s alternative transportation assets and will put less strain on the roadway network. **ESMS supports the establishment of maximum parking ratios** (page 92.) The implementation framework also recommends the unbundling of parking costs from rental/purchase costs, though it is not clear how this will be accomplished. **We recommend that new as-of-right or RDA zoning prohibit the “bundling” of parking spaces with the purchase price or monthly rent of a unit**, so that no household is required to pay for a parking space that it does not need. The zoning should also set out a framework for property owners to make unused spaces available to new development and for developers to satisfy parking requirements through acquisition of long-term leases on off-site spaces.

The plan suggests that changes to on-street parking regulations should be “explored” (page 171), but falls short of recommending an area-wide parking study essential to the effective design and implementation of such recommendations. Parking is a major concern of Egleston Square merchants; while we feel that meters may be an effective and equitable strategy for managing parking supply, they cannot be implemented without a careful assessment of district parking assets and needs. **The Plan should explicitly recommend a comprehensive parking study for Egleston Square that includes a feasibility analysis of a “parking benefit district”** (recently enabled by state legislation) that would institute parking policies and fees, with parking revenue reinvested in local transportation and urban realm improvements.

Transportation

We suggest adding the entire length of School Street as a candidate for Local Street Improvements on the “Recommended Transportation Improvements” map (page 91).

While Atherton Street is identified, it is only one-way. School Street is more heavily used and has a wider ROW, making it a better candidate for dedicated bike/pedestrian facilities. School Street also serves three schools, is the most direct route from Stony Brook T station to the core of the Egleston business district, and links Washington Street to the Walnut Avenue entrance to Franklin Park.

Thank you in advance for your help with this process. Please call me with any questions.

Regards,

Luis

ps If the BRA board decides to postpone a vote, I would appreciate the opportunity to add more to this list.

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