



# HARLEM AFRICAN BURIAL GROUND

TASK FORCE

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To: Aileen Gorsuch, Senior Planner  
NYC Economic Development Corporation

Denise Pisani, Senior Project Manager  
NYC Mayor's Office of Sustainability

From: Harlem African Burial Ground Task Force Executive Committee

Subject: Response to “126th Street Bus Depot Scope of Work for a Draft  
Generic Environmental Impact Statement”  
CEQR # 16DME011M

Date: October 21, 2016

We, as members of the Harlem African Burial Ground Task Force Executive Committee, appreciate this opportunity to provide a written response to the Environmental Assessment Statement, Positive Declaration, and Draft Scope of Work issued by the Office of the Deputy Mayor for Housing and Economic Development on August 19, 2016.

As representatives of a wide variety of overlapping interests in the East Harlem community who have come together to preserve, protect, honor and memorialize the Harlem African Burial Ground, the Harlem African Burial Ground Task Force has been recognized by Community Board 11 since 2011 as the community's core and constitutive voice on this complex matter. For nearly a decade, the Task Force has advanced the cause of the Harlem African Burial Ground. In all of our endeavors, we have simultaneously experienced the weight of responsibility and the exhilaration of privilege as we have been serving – and will continue to serve – the interests of both history and the future.

We have been grateful for close cooperation with the New York City Economic Development Corporation and for collaborative discussions with the 126th Street Bus Depot Task Force. We are particularly pleased, therefore, for the inclusion of the Harlem African Burial Ground Task Force Vision and Mission Statement as Appendix I of the Scope of Work Statement. We look forward to this continued collaboration throughout the process that will result in the Request for Proposals (RFP).

Our comments are divided into specific sections related to particular points in the scoping document and general observations related to the tenor, goals and overarching purposes of the document as a whole.

**Specific Sections:** (Individual sections of the document are referred to as “easily” as possible by reference to document sections, page numbers, paragraphs, sentences, charts, bullet points, etc.)

### *Title of the Project*

Given its sacredness, please use the following title in future documents and presentations when referring to the project site: “The Harlem African Burial Ground Memorial and Mixed Use Project.” If necessary, for geographical placement, you can add “at the site of the former 126<sup>th</sup> Street Bus Depot.”

### *Project Description*

#### *Floodplain and Coastal Zone*

p. 6. para 1. “The project site is partly located in ... As indicated on the map ...” Please include the map in the final scope of work and EIS.

#### *Surrounding Area and Context*

p. 7. para 1. The delineated boundaries of the East Harlem neighborhood are clear, but the phrase “located north on the Upper East Side” does not reflect the familiar geographic determination. Please rephrase to something like “The East Harlem neighborhood is located in upper Manhattan.”

p. 7 para 4. last sentence: Since there is no previous discussion of bus routes in the document, you may want to delete the first word “Other.”

p. 8 end of first full para at top of page. You may want to highlight that the next phase of the Harlem River Park, from 125<sup>th</sup> to 132<sup>nd</sup> streets, will be adjacent to and directly east of the Harlem African Burial Ground. The two will be linked programmatically and in design per discussions with the NYC Parks Department.

#### *Purpose and Need for the Proposed Project*

p. 8 fourth para second sentence. It is equally common for the City of New York to have adjoining blocks zoned the same or different, depending on the circumstances. Given the sacredness of the Harlem African Burial Ground site, a detailed analysis of why it could be zoned differently from the E125/MEC project as a protective measure should be included in the EIS.

p. 9 first para. Please describe what a “financially feasible” program looks like, including how it is arrived at, in a quantitative way. We are attempting to understand what the minimum development scenario might look like as compared to the Reasonable Worst Case Development Scenario, for purposes of building and maintaining the Harlem African Burial Ground memorial.

p. 9 second para. Please define “Pipeline Site.” Since the East Harlem Neighborhood Plan considers the project site to be a place of significant local and cultural heritage, the Plan may also consider it to be in need of sensitive redevelopment so as not to extinguish this significance.

*Table 1: RWCDs Land Use Breakdown*

p. 10 bottom of the table. In place of “18,000,” we request “At least 18,000.” Also, please include in the table the amount of open space that will be dedicated to meet sky exposure plane goals regarding light and air.

*Task 2. Land Use, Zoning and Public Policy*

Please be sure to include an analysis of how commercial (office/retail) and residential uses on the project site will impact the indoor and outdoor memorial space on the same site. We are concerned that the experiences of visitors seeking to pray, reflect or honor those buried on this sacred site may be overshadowed or devalued by daily impacts of commercial activity and residential life such as business and residential deliveries, garbage collection, signage and daily changing traffic patterns.

*Figure 3. Land Use Study Area Map.* We suggest a site visit to determine actual land use in the secondary study area. For example, the map incorrectly labels Triboro Plaza as vacant land. We also suggest that the Secondary Study Area be expanded to include planned nearby developments along East 125<sup>th</sup> Street, such as the Second Avenue Subway, the Pathmark site, the Motor Vehicles site, and the east and west sides of Park Avenue, between East 124<sup>th</sup> and 125<sup>th</sup> streets. In addition, please consider distinguishing the yellow coding for One & Two Family Buildings from Multi-Family Walk-Up Buildings (or removing One & Two Family Buildings from the Legend if there are none in the study areas).

*Task 3. Socioeconomic Conditions*

Throughout this section, the cumulative impacts of immediately adjacent and nearby projects on this one – as well as the opposite – must be systematically studied.

*Indirect Residential Displacement*

p. 16 bullet 3. In this analysis, please highlight the potential impacts to housing on the south side of 126<sup>th</sup> Street opposite the project site, in addition to the income-targeted housing lining Lexington Avenue.

*Indirect Business Displacement*

p. 17 second bullet. Note that existing economic patterns will indeed be altered: business activities of several sorts will be increased with the influx of national and international visitors.

p.17 second para after bullet list. Given the lack of retail services in the project area, the addition of any retail/commercial/community facility use will impact the socioeconomics of the area and therefore should be studied.

#### *Task 5. Open Space*

The expansion of the Harlem River Park esplanade should be analyzed in this section as it is intended to be visually and programmatically connected and designed in such a way as to link it with the Harlem African Burial Ground site.

p. 20 top bullet point. The impacts of visitor populations arriving and departing by vehicles and on foot, along with the use of both the project site as a whole and the memorial in particular should be considered in the open space analysis.

#### *Task 6. Shadows*

Please include the impacts of shadows on the proposed indoor and outdoor memorial, along with existing neighborhood amenities, such as Harlem River Park (and its future expansion), Crack is Wack Park, the Harlem River Ball Fields and the Harlem River itself.

p. 20 Tier 2 Screening Assessment bullet point. In the final scope of work and EIS, please define what is being referred to in the draft scope of work as the “triangular area,” and indicate its particular significance to the Harlem African Burial Ground.

#### *Task 7. Historic and Cultural Resources*

In the final scope of work for the EIS, the Harlem African Burial Ground Task Force and its ongoing partnership with the NYC EDC, the Mayor's Office of Sustainability, the 126<sup>th</sup> Street Bus Depot Task Force, LPC and SHPO needs to be more clearly described, including the role the Harlem African Burial Ground Task Force plays as the community's representative voice in the development of plans for the project site.

The anticipated designation of the Harlem African Burial Ground on the state and national historic register needs to be included in the impact analysis.

#### *Task 8. Urban Design and Visual Resources*

The analysis should include any obstruction of the view corridors linking the proposed memorial to the future Harlem River Park esplanade expansion and views from the Willis Avenue Bridge, where NYCDOT has created storyboards facing the project site and therefore linking the views from the bridge to the memorial site. In fact, given the various public thoroughfares surrounding the site at grade and elevated, analysis should include how the memorial will be viewed from various angles, including from 1<sup>st</sup> and 2<sup>nd</sup> avenues, East 126<sup>th</sup> and 127<sup>th</sup> streets, Harlem River Drive, and the Triboro/RFK Bridge.

Analysis should also include the desires of the Harlem African Burial Ground Task Force to have the project site become iconic and innovative in design, seamlessly integrating the scale and sight lines of the project to the surrounding neighborhood, thereby improving the pedestrian experience. It will be helpful if the EIS shows axonometric massing options to accomplish these goals.

We request that the Harlem African Burial Ground Task Force design guidelines be incorporated into the final scope of work and the EIS. We consider the design principles articulated in this document to be as central to the project as our Vision and Mission Statement.

We also request that the EIS define the Request for Proposals (RFP) process and clearly state how the sacredness of the Harlem African Burial Ground will be addressed. We seek to ensure that all Harlem African Burial Ground Memorial and 126th Street Bus Depot Site proposals clearly demonstrate sensitive plans for both the protection of the hallowed burial ground and visionary welcome for visitors who wish to honor the memory of those buried there, study the historical significance of the site from the Lenape inhabitation through to the present, and reflect on their own identities as citizens of the world.

#### *Task 9. Natural Resources*

A thorough analysis of the flood-plain must be developed here with particular reference to the impact on the Harlem African Burial Ground.

#### *Task 10. Hazardous Materials*

Particular attention must be paid here to the underground bus depot gasoline and oil tanks and past spills, along with any groundwater effected by the former waterfront and outdoor NYCDOS salt dome that was on the east side of the Harlem River Drive adjacent to the project site. Particular reference to the impact on the Harlem African Burial Ground should be indicated.

#### *Task 11. Water and Sewer Infrastructure*

##### *Wastewater and Stormwater Infrastructure*

p. 25 bullet 1. Analysis should include the capacity of the Ward's Island sewage treatment facility and what impact the development of this project site will have on it.

As the Harlem African Burial Ground Task Force requests that the project site be LEED certifiable, analysis of various landscaping methods that reduce hard surfaces and runoff should be included, such as bioswales, with particular reference to the impact on the Harlem African Burial Ground.

#### *Task 12. Energy*

Analysis of how this project will develop carbon neutral/carbon reduction design methods on site should be discussed here. We'd like to see this project be a United States and international model of reduced carbon footprint and efficient energy management.

#### *Task 13. Transportation*

##### *Traffic*

p. 27. We request analysis of the intersection of East 127th Street and First Avenue with reference to both pedestrian and vehicular space. Car and foot traffic at this intersection is likely to increase if this corner comes to mark an entry point to and from the Harlem African Burial Ground memorial.

p. 28. Second bullet. Analysis of the 127<sup>th</sup> Street viaduct replacement project and the Triboro/RFK Bridge ramp project should be done so as to understand the both the traffic impacts and their overall urban design impacts on the project site.

*Transit ... Bus.* We disagree that "a detailed analysis of bus conditions is generally not required" here. Please include an analysis of bus conditions as anticipated large numbers of visitors individually and in groups arriving to and departing from the Harlem African Burial Ground memorial by bus will likely dictate new bus patterns in the community. The EIS should also include an examination of the impact of bus conditions on the sacred atmosphere of the memorial.

##### *Parking*

p. 31. It's not clear why only 146 parking spaces will be analyzed and not the 300 proposed. Please explain this further in the final scope of work and EIS, with particular reference to the impact on the Harlem African Burial Ground.

*Task 14. Air Quality*

*Mobile Source Analysis*

p. 32 Please include in the analysis the impact of the Harlem River Drive and Harlem River bridges adjacent to the site, with particular reference to the impact on the internal and external Harlem African Burial Ground memorial spaces.

*Task 15. Greenhouse Gas Emissions*

We'd like to see in the analysis how the highest LEED standards are being met to reduce greenhouse gas emissions, global warming and rising sea levels.

*Task 16. Noise*

We'd like to see a comprehensive analysis of how the project will impact noise levels on the internal and exterior Harlem African Burial Ground memorial space and surrounding neighborhood, along with how the neighborhood noise sources, such as the Harlem River Drive and the various bridges over the Harlem River will impact the project site, especially the indoor and outdoor memorial spaces.

*Task 17. Public Health*

Since the draft Scope of Work specifically identifies air quality, noise, traffic, transportation and other aspects of the environment that will likely have an impact on any new development, we urge the city to conduct a complete public health assessment. Furthermore, since community residents and visitors will also view the memorial as a space for cultural renewal, reflection and spiritual growth, these elements of social well-being should also be addressed in the assessment of public health.

*Task 18. Neighborhood Character*

Please include in this analysis the non-built aspects of neighborhood character, such as its spiritual, social, historic and cultural features and their relationship with the Harlem African Burial Ground.

*Task 19. Construction*

In addition to the physical impact the construction will bring, the analysis should include the spiritual, sacred and social impacts this project will have on the surrounding community.

Please explain in this section how the construction work will interface with any archeological excavation on the project site.

*Task 21. Alternatives*

We request that the Harlem African Burial Ground Task Force design concepts by the Task Force design and architectural consultant Anthony Carrion, which are publicly available on the Harlem African Burial Ground Task Force website, be formally recognized and analyzed as alternatives to the Reasonable Worst Case Development Scenario.

Please define what FAR threshold triggers Mandatory Inclusionary Housing (MIH), and whether this threshold can be modified for special projects such as the Harlem African Burial Ground. We understand the need for income-targeted housing in the community and would like to see in the EIS how reducing the overall FAR might impact MIH and the Harlem African Burial Ground memorial.

Please include a “financially feasible” alternative to the Reasonable Worst Case Development Scenario (RWCDs) where there is minimal impact on the environment while simultaneously achieving the mutual goals set by the Harlem African Burial Ground Task Force and the City of New York. The term “financially feasible” should be defined and quantified to allow for decision makers and other interested parties to gain a clear understanding of what the tradeoffs are among several alternatives and the RWCDs.

*Task 23. Executive Summary*

Please emphasize the sacredness of this project site in the executive summary so that those who only review this chapter will clearly understand the importance of this project on the community, both locally and internationally.

General Observations

Certain overarching themes must unify ideas about this Harlem African Burial Ground site for all who consider it: neighbors, friends, city observers and potential developers.

This site is sacred and historic.

Disregard for the sanctity of the Harlem African Burial Ground in the nineteenth and twentieth centuries resulted from the injustice that has shaped our society since its very beginnings. If now, in the early twenty-first century, the development of the current site acknowledges the site’s unique history and sacred identity, then the new development will not replicate prior patterns of injustice and can provide an inspiring model for memorial-based reconciliation

projects throughout the world.

The redevelopment of this sacred site – an African burial ground and founding spot of the village of world-renowned Harlem, located on top of a former Lenape waterfront gathering place – must be analyzed as more than just another site or, better, another site with some special, uniquely demanding historical features. Because the site is so historically significant, it cannot be considered or studied in isolation: the site and anything that might be built on it must be examined within their contexts. The relationships among the site, its neighborhood, and the built and the natural environments must be examined in all their complexities. Recognition of the potential gifts of the site to the neighborhood must be more fully considered in relation to the East Harlem Neighborhood Plan.

Finally, the standards by which this site's development will be judged must be the very best and highest in the world. The “leadership” component of LEED planning is the project's starting place. The Harlem African Burial Ground memorial site must be a model of aesthetically daring, environmentally innovative and spiritually fulfilling urban design. We are hopeful that the final scoping document and EIS will encourage a radically different vision of complementary urban and memorial development.

Thank you.