January 31, 2019

Hon. Polly Trottenberg Commissioner New York City Department of Transportation 55 Water Street, 9th Floor New York, NY 10041 Hon. Paul A. Karas Acting Commissioner New York State Department of Transportation 50 Wolf Road Albany, NY 12232

Hon. Michael Canavan
Acting Division Administrator
U.S. Department of Transportation – Federal Highway Administration – New York Division
Leo W. O'Brien Federal Building, Room 719
11A Clinton Avenue
Albany, NY 12207

Re: Opposition to the "Promenade Highway" proposal for the reconstruction of the Brooklyn-Queens Expressway (BQE)

Dear Commissioner Trottenberg, Acting Commissioner Karas and Acting Division Administrator Canavan:

We write in united opposition to the "Promenade Highway" proposal for the reconstruction of the Brooklyn-Queens Expressway (BQE) between Atlantic Avenue and Sands Street as proposed by the New York City Department of Transportation (NYC DOT) in its so-called "Innovative Approach." This approach threatens the Promenade; the thriving neighborhoods of Brooklyn Heights, DUMBO, Fulton Ferry Landing, Vinegar Hill and Cobble Hill, all of which are designated Landmark Districts; and the Brooklyn Bridge.

We are seven civic groups representing approximately 40,000 members and supporters across New York City and its metropolitan area. We are devoted to preserving and protecting the rich fabric of our city and the quality of life in our vibrant neighborhoods.

Transforming the Promenade into a six-lane interstate highway through a "temporary" six-year, multi-billion dollar project would inflict severe environmental, social, and economic harm on the neighboring communities and their tens of thousands of residents – and is unacceptable. Any destruction of historic homes under the proposal is also unacceptable.

Brooklyn Borough President Eric Adams has expressed unequivocal opposition to the Promenade Highway plan and the other local elected officials have expressed strong reservations and called upon NYC DOT to examine and identify possible alternatives.

The unique qualities of the Promenade, the Brooklyn Bridge and the adjacent neighborhoods have been recognized, celebrated, and protected by the many landmark designations bestowed upon them:

- 1965: Brooklyn Heights is designated the first Historic District by the New York City Landmarks Preservation Commission (NYC LPC)
- 1965: Brooklyn Heights is designated a National Historic Landmark
- 1965: The Brooklyn-Queens Expressway Esplanade portion of I-278 is approved for the Final List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System<sup>1</sup>
- 1966: Brooklyn Heights Historic District is listed on the National Register of Historic Places
- 1967: Brooklyn Bridge is listed on the National Register of Historic Places
- 1967: Brooklyn Bridge is designated an Individual Landmark by NYC LPC
- 1969: Cobble Hill is designated as an Historic District by the NYC LPC
- 1974: The view from the Promenade is the first and only protected Special Scenic View District (SV-1) designated by the New York City Department of City Planning
- 1974: Fulton Ferry District is listed on the National Register of Historic Places
- 1976: Cobble Hill Historic District is listed on the National Register of Historic Places
- 1977: Fulton Ferry is designated as an Historic District by the NYC LPC
- 1980: Brooklyn Heights, Fulton Ferry and Cobble Hill are listed on the State Register of Historic Places
- 1997: Vinegar Hill is designated as an Historic District by the NYC LPC
- 2000: DUMBO Industrial District is listed on the National Register of Historic Places and the State Register of Historic Places
- 2007: DUMBO is designated as an Historic District by the NYC LPC

This current proposal to replace the Promenade with an elevated highway resurrects an ill-conceived idea originally put forth by Robert Moses in 1943. The Brooklyn Heights community rejected it at the time and proposed the current triple cantilever configuration.<sup>2</sup> Demolition of the historic Promenade should not be accepted as a foregone conclusion.

<sup>&</sup>lt;sup>1</sup> "This 8-block, 3-level cantilevered structure is significant as an innovative solution for constructing a modern highway while preserving the integrity of Brooklyn Heights neighborhood and preserving area views of Manhattan. The esplanade contributes to the Brooklyn Heights National Historic Landmark District."

<sup>&</sup>lt;sup>2</sup> After the City Planning Commission – including Robert Moses – dropped its proposal for a diagonal highway in a trench through the Heights, it next proposed "an elevated 6-lane highway 'at the level of the present promenade, on top of the embankment east of Furman Street directly under the residences on the west side of Columbia Heights." It fell to the community of Brooklyn Heights to explain to Robert Moses that "...much of the damage to [Columbia Heights properties] could be avoided by a double deck covered highway, built into the embankment," an idea that Robert Moses accepted upon further study. The Old Timer Writes, Brooklyn Heights Press, April 9. 1953.

As pressing as the BQE's underlying structural problems are, the reconstruction process must not privilege traffic over neighborhoods and deprive the public of a cherished open space of historic importance for longer than is absolutely necessary. Furthermore, it is essential that the Promenade be restored to its present size and configuration, without the addition of unnecessary kiosks or other commercial structures.

We respectfully request that the NYC DOT take the "Promenade Highway" off the table. In the upcoming review process, the City must protect its iconic treasures – the Brooklyn Heights Promenade and the Brooklyn Bridge – as well as the nearby historic buildings, and the people living in the surrounding area.

We urge you to work together with us to find a better alternative.

Sincerely,

Peg Breen President

The New York Landmarks Conservancy

Simeon Bankoff

**Executive Director** 

Historic Districts Council

Firmen Farket

Michael Gruen

President

The City Club of New York

Doreen Gallo

Doreen Gallo

Director

**DUMBO** Neighborhood Alliance

Alex Herrera

Director, Technical Services Center

The New York Landmarks Conservancy

Jay DiLorenzo

President

Preservation League of New York State

Lisa Ackerman

Interim Chief Executive Officer

World Monuments Fund

Ligra Vaineres

Aldona Vaiciunas

President

Vinegar Hill Neighborhood Association

## cc: Brooklyn Heights Association A Better Way NYC

New York City Mayor Bill de Blasio

New York State Governor Andrew Cuomo

New York City Comptroller Scott Stringer

New York City Council Speaker Corey Johnson

New York City Councilmember Stephen Levin

Brooklyn Borough President Eric Adams

New York State Senator Brian Kavanagh

New York State Assemblymember Jo Anne Simon

U.S. Representative Nydia Velazquez

State Historic Preservation Office (SHPO) – New York State Parks, Recreation & Historic Preservation

U.S. Advisory Council on Historic Preservation