



American Planning Association  
**New York Metro Chapter**

*Making Great Communities Happen*

June 3, 2009

Honorable Amanda Burden  
Chairperson  
New York City Planning Commission  
22 Reade Street  
New York, NY 10007

**Re: Proposed Special Coney Island District**

Dear Chair Burden:

The American Planning Association's New York Metro Chapter supports the Department of City Planning's (DCP) proposal to facilitate positive development in Coney Island while encouraging a resurgence of an important recreational resource and entertainment destination in New York City. We wish to thank the Brooklyn Office and the Coney Island Redevelopment Corporation (CIDC) for taking the time to present the proposal to our Zoning Committee and to answer the many questions that we had.

While we have concerns about some areas of the proposed planning initiative, we applaud the work that has gone into crafting this ambitious plan. We strongly support the opening of the area to new residential and retail development, the extension of the City's Inclusionary Housing program, and the effort to create a permanently protected amusement area. These are all key components for the future vitality of this waterfront neighborhood. We hope the ongoing dialogue with Brooklyn Community Board 13 and local property owners will have positive results for this initiative.

The APA New York Metro Chapter offers the following suggestions to the City Planning Commission, CIDC, and the administration for strengthening the proposal and its implementation:

**Amusements:** Coney Island's strength is as a seasonal, boardwalk, amusement venue in a dense urban setting. A resurgent amusement area should be the core and anchor of Coney Island. Such an amusement area should attract a wide demographic and should be open, accessible, and affordable to the public. The APA New York Metro Chapter encourages the City to incorporate these values as important goals in evaluating responses to any request for proposals (RFP) to develop or operate the amusement area. We would suggest the use of charettes and other collaborative planning tools to determine the most appropriate types of amusements.

**Use Controls and Transparency Requirements:** APA New York Metro Chapter supports the aim of the proposed use controls to require Use Group A1 amusement uses in certain areas of Coney East and to limit the square footage of more conventional retail uses. However, we encourage DCP to consider extending the



amusement use requirements outside of the Bowery and Wonder Wheel Way, in order to ensure that amusements are interspersed throughout the Special District. Other controls that should be considered to ensure extensive amusement uses include requiring a minimum depth of spaces that provide the required frontage of amusement uses, or a floor area goal for amusement uses in the Special District, which could be monitored in a manner similar to the certification process for office uses in the Special Hudson Yards District.

The ground-floor transparency requirements further serve to encourage an open and inviting streetscape. While the proposed allowance for open-air frontage in lieu of transparency in some areas makes sense, there should be more clear guidelines for how such openings in the frontage would operate, what is meant by “seasonal business hours,” and what type of frontage would be acceptable during non-business hours or in the off-season.

**Controls on Use of City-Owned Property:** One additional way to facilitate small-scale retail or amusement uses would be through controls on the use of city-owned property, whether through lease conditions or deed restrictions. Such restrictions may reduce the amount for which developers would be willing to lease or purchase such property, but could be a tool for advancing public policy. Similar controls should be considered for the provision of additional affordable housing on City-owned land that is conveyed for private development.

**Waterfront Development and Connections:** Proximity to the waterfront is one of Coney Island’s defining characteristics. We urge coordination with efforts underway by the City and State on climate change adaptation and sea level rise. While the proposed redevelopment would provide additional pedestrian connections to the waterfront, we suggest that the City include further measures to promote active use, including expanded beach facilities, possible pier development, and educational and recreational programs to encourage use and understanding of the City’s waterways. In addition to pedestrian links, we recommend upland connections, view corridors and signage, while active uses could include boating and fishing. Enjoyment of the boardwalk and waterfront can be maximized through provision of relatively low-cost amenities such as seating and shade areas, which we encourage the City to find ways to provide.

**Infrastructure Preparation:** Much of the redevelopment area requires significant infrastructure installation or improvements. We applaud DCP’s collaboration with other City agencies to plan for the necessary improvements, but would encourage further up-front design and collaboration preceding rezoning initiatives. In particular, well-formed plans for issues such as street grading, flood protection, and availability of utilities should be well understood before a rezoning initiative is approved. There should also be sufficient capital budget commitments to ensure that anticipated development is not delayed by potential unavailability of funding for necessary infrastructure.



**Transit:** Transit access is crucial for successful development. We urge the DCP and the Mayor's Office to work with the Metropolitan Transportation Authority and with ferry operators to provide express transit service to better connect Coney Island with Manhattan's central business district. Frequent and fast connections will help to attract additional residents and tourists to Coney Island.

Thank you for the opportunity to comment on this well-crafted proposal. We hope that the City Planning Commission, the City Council and the Mayor's Office will consider the above comments as this proposal moves ahead, and we wish for the best success of future development in the Coney Island area. Please feel free to contact us for any assistance as this initiative proceeds.

Sincerely,

A handwritten signature in black ink that reads 'Donald C. Burns'.

Donald C. Burns, AICP  
President, New York Metro Chapter  
American Planning Association

CC: Lynn Kelly, Coney Island Redevelopment Corporation  
Purnima Kapur, DCP Brooklyn Office

*The New York Metro Chapter of the American Planning Association represents more than 1,300 planners, designers, engineers and other professionals involved in planning for the region's communities. Our members work in the private sector, in nonprofit organizations and in government agencies to address planning issues affecting the physical, social and economic environment of the metropolitan region (New York City, Long Island and the Hudson Valley). We are part of the American Planning Association whose 46,000 members are dedicated to creating livable communities of lasting value.*

*The NY Metro Chapter is particularly committed to promoting planning-related public education, encouraging broad participation in planning decisions, and collaborating with other organizations to advocate the highest standards of the planning profession.*