



September 20, 2018

Honorable Bill de Blasio  
Mayor of the City of New York  
City Hall  
New York, NY 10007

RE: New York City Borough-Based Jail System Draft Scope of Work to Prepare a Draft Environmental Impact Statement  
CEQR No. 18DOC001Y

Dear Mayor de Blasio:

We write with regard to the current proposal to expand the Brooklyn House of Detention (BHOD) as part of New York City's plans to close Rikers Island Correctional Facility and remake the City's approach to corrections to be smaller, safer, and fairer as recommended by the Independent Commission on New York City Criminal Justice and Incarceration Reform, a/k/a the Lippman Commission. We write to request that the draft scope be withdrawn and that the public be actively engaged before releasing a revised scope.

We represent the districts within which the BHOD is located and those immediately adjacent. Thus, we are familiar with current conditions and community dynamics. We write to call your attention to certain compelling concerns of the communities we represent.

First and foremost, we want to be very clear that we endorse wholeheartedly the vision of closing Rikers Island and moving to a system of smaller, safer community-based jails. In that we are united with the communities, who overwhelmingly support the closure of Rikers and who accept the premise that the BHOD needs to be reconstructed to further the goal envisioned by the Lippman Commission. We are all committed to working towards justice for all New Yorkers.

In that vein, we have been calling for a robust public engagement process, which we believe should have started in advance of the development of a scoping document. Our desire for robust communication was undermined early in the process, in February, when the City revealed that instead of engaging each community, we would be subject to an unprecedented joint ULURP. Still, we believe that more community engagement would have led to a better scope. To that end, we organized a well-attended panel presentation in March 2018 to kickoff community education and engagement. Unfortunately, the City did not take advantage of the positive interest and momentum created at that meeting to actively include the public in its thinking and planning for the related environmental and land use planning processes. Between March and August, when

the scoping documents were released, the City made little to no effort to engage the community, although our communities were more than willing to sit down with the City.

Upon the release of the Draft Scope, the public has been reading and organizing to understand and respond to the proposal. Several important issues have arisen, particularly about the consequences of a joint ULURP on planning for the proposed facilities. This approach seems most clearly to reflect a mathematical calculation of 6,000 beds divided equally among four of New York City's five boroughs, rather than the Lippman Commission's recommendation for a smaller, safer, fairer jail located in each borough. This has major implications about the feasibility of delivering on the promise of smaller, safer, fairer jails in such large facilities.

We have come to believe that our initial recommendations of a robust, active public engagement process needs to occur before proceeding further with the ULURP process. To that end, we request that: (a) the draft scope be withdrawn; and (b) the public be actively engaged with an eye toward releasing a revised scope reflective of that engagement.

We are eager to assist the administration in developing and implementing a program of active public engagement.

Very truly yours,



Velmanette Montgomery  
State Senator



Jo Anne Simon  
State Assemblymember



Brian Kavanagh  
State Senator

cc: Hon. Stephen Levin  
NYC Council Speaker Corey Johnson  
Brooklyn Borough President Eric L. Adams  
Brooklyn City Council Delegation