

Jerome Avenue Rezoning

Final Scope of Work for an Environmental Impact Statement

CEQR No. 17DCP019X

Lead Agency: New York City Planning Commission

**Prepared by: NYC Department of City Planning
STV Incorporated**

August 18, 2017

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JEROME AVENUE REZONING
FINAL
SCOPE OF WORK FOR AN ENVIRONMENTAL IMPACT STATEMENT

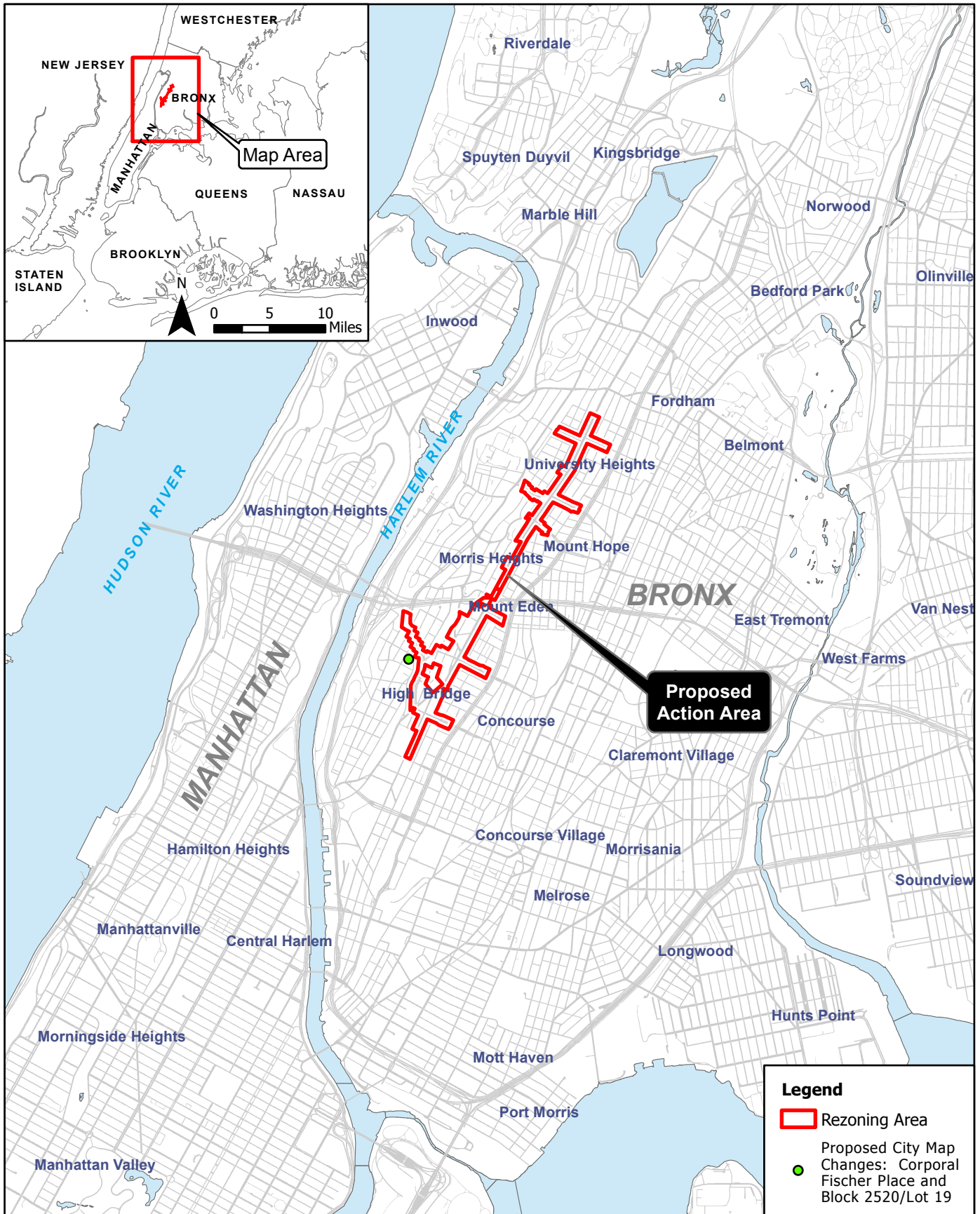
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A. INTRODUCTION

For more than a decade, residents and community stakeholders of the Southwest Bronx requested that the City study the land use and zoning along the Jerome Avenue Corridor. It is clear that the existing zoning and land use patterns are not consistent with community goals, specifically, its vision for Jerome Avenue as a vibrant activity center which supports and is the centerpiece of the surrounding neighborhoods. With the launch of the Mayor's Housing Plan in 2014, *Housing New York: A Five-Borough, Ten-Year Plan*, which seeks to build or preserve 200,000 units of affordable housing throughout the city, and the subsequent City Council adoption of a Citywide zoning text amendment to authorize a Mandatory Inclusionary Housing (MIH) program, a unique and welcomed opportunity was presented to the City to take close examination of several neighborhoods throughout the city, the Southwest Bronx included. Here, the New York City Department of City Planning (DCP) is undertaking, in close partnership with community stakeholders and city agencies, the Jerome Avenue Neighborhood Study (the "Study"). The Study has and continues to look comprehensively at several neighborhoods including Highbridge, Concourse, Mt. Eden, Mt. Hope, University Heights, and ~~Fordham~~ Morris Heights, with the Jerome Avenue Corridor as the central spine. The Study takes a broad look at the needs of the community and through a community outreach process has developed a vision for the study area which has resulted in the Jerome Avenue Neighborhood Plan (the "Plan"). ~~The Plan provides a number of strategies to spur affordable housing, economic development, improve health and quality of life, investment in the public realm, in~~ In addition to proposed land use actions that accommodate the need for high quality affordable and retail uses, the Plan provides a number of strategies to spur economic development, improve health and quality of life, and invest in the public realm and open spaces.

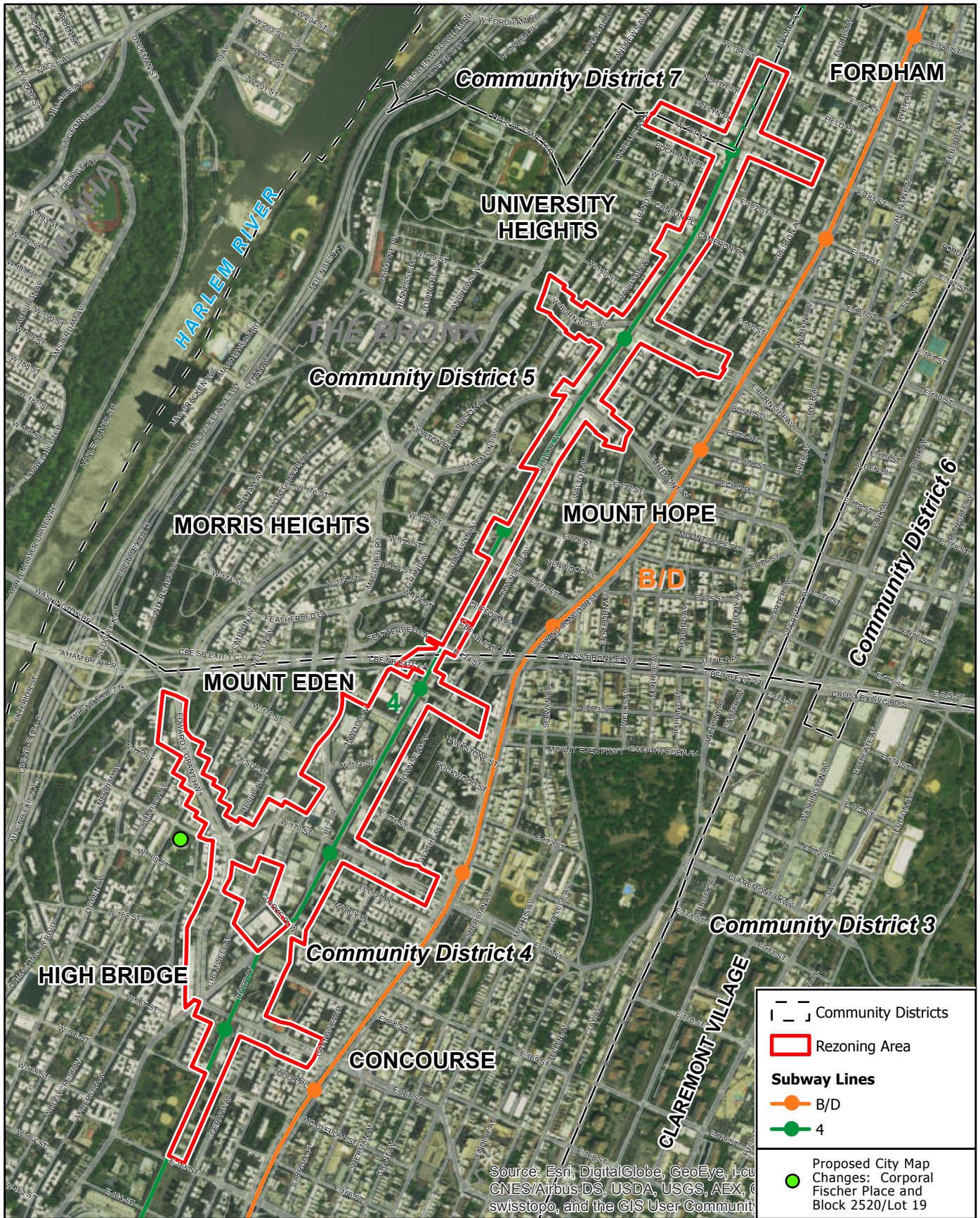
~~The New York City Department of City Planning (DCP) is proposing a series of land use actions; including that include zoning map amendments, zoning text amendments and city map changes (collectively the "Proposed Actions") to support and implement the Plan, which is the subject of an on-going community engagement process, to create opportunities for new affordable housing and community facilities including new parkland, establish requirements that a share of housing remain permanently affordable,~~



Source: NYS Office of Information Technology Services GIS Program Office (GPO), 2016; STV Incorporated, 2016.



Figure 1a

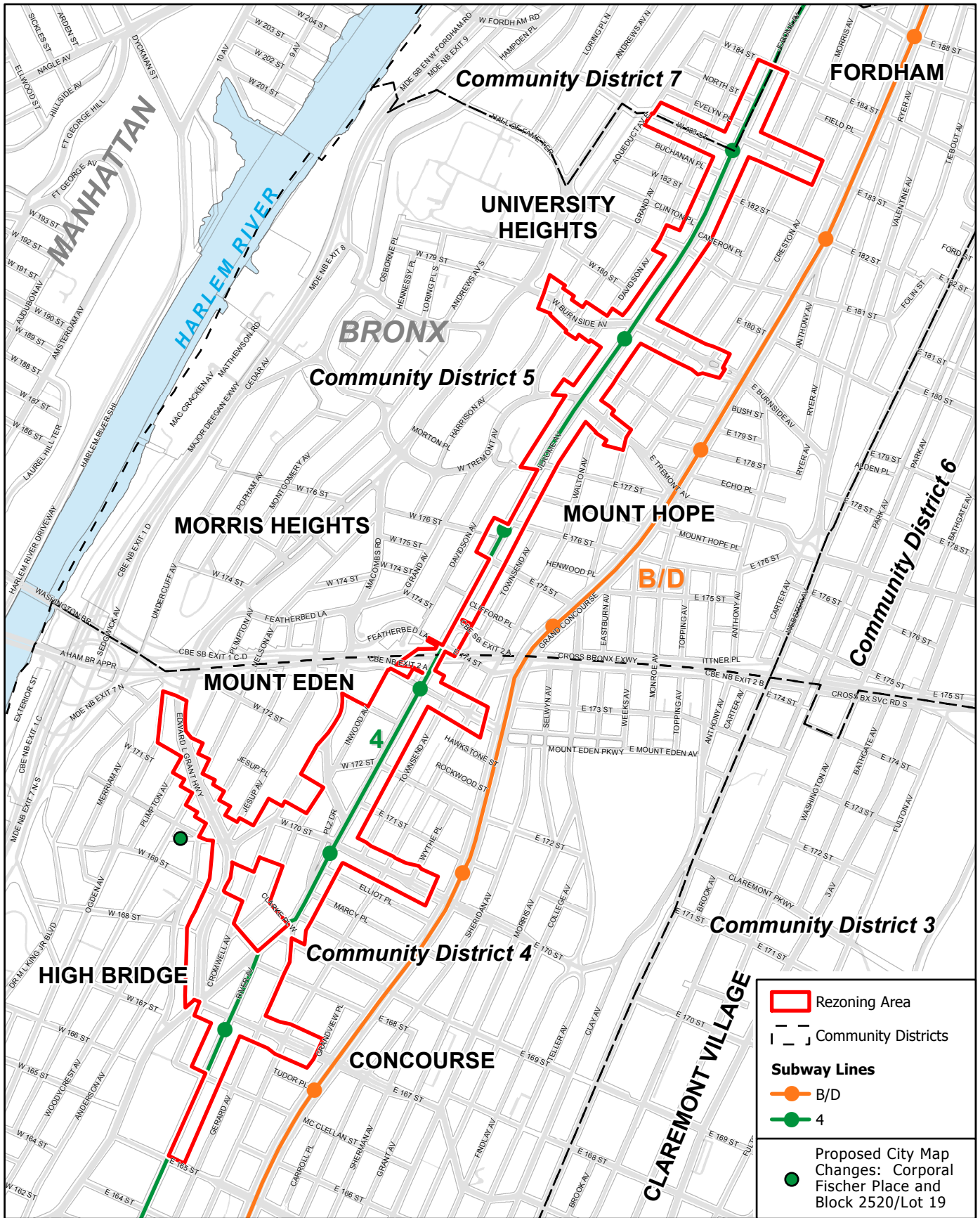


Source: New York City Department of City Planning, 2016; STV Incorporated, 2016.



Figure 1b

**PROJECT AREA/LOCATION
- AERIAL VIEW**



Source: New York City Department of City Planning, 2016; STV Incorporated, 2016.

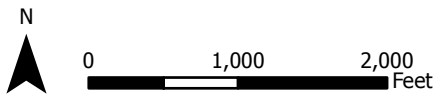


Figure 1c

diversify area ~~retail~~commercial space, support small businesses and entrepreneurs, and promote a safe and walkable pedestrian realm.

The proposed zoning text and map amendments would rezone an approximately ~~7392~~-block area primarily along Jerome Avenue and its east west commercial corridors in Bronx Community Districts 4, ~~and~~ 5, and 7 (the “Rezoning Area”), and would establish the Special Jerome Avenue District coterminous with the Rezoning Area. The Rezoning Area is generally bounded by E.165th Street to the south and 184th street to the north; and also includes portions of Edward L. Grant Highway, E.170th Street, Mount Eden Avenue, Tremont Avenue, Burnside Avenue and E.183rd Street. The proposed city map changes are located a block outside of the Rezoning Area in the Highbridge neighborhood of the Bronx, Community District 4 (~~see Figure 1a, “Project Location”~~). The Proposed Actions are expected to result in a net increase of approximately 3,250 dwelling units, 72,273 square feet of community facility space, 35,575 square feet of commercial/retail space; and a net decrease of 47,795 square feet of industrial space and 98,002 square feet of auto-related uses.

The Proposed Actions, described in “Purpose and Need for the Proposed Actions”, will facilitate the implementation of the recommendations designed to support the revitalization of the Jerome Avenue corridor and its associated east-west connections. The proposed actions will help realize the vision for the study area as an active, vibrant and inviting mixed-use corridor with opportunities for residents to not only live and work, but to meet their day to day needs within their own community.

The ~~proposed actions~~Proposed Actions are reflective of the comments and feedback received through DCP’s on-going community engagement process. The proposed actions seek to achieve the following land use objectives:

- Provide opportunities for high quality, permanent affordable housing with options for tenants at a wide range of income levels.
- Ensure that any new construction fits ~~visually and architecturally~~ into its surrounding neighborhood context.
- Increase the opportunities to diversify neighborhood retail and services.
- Permit more intensive density and a broader range of uses in two nodes to anchor the corridor and surrounding neighborhoods.
- Create special rules for new development along the elevated rail line to provide light and air along the corridor and ensure adequate distance between residential uses and the train.
- Create special rules for new buildings and street wall continuity and relief on irregular lots.
- Create a walkable, inviting commercial corridor by promoting non-residential ground floor uses and diverse retail to support community needs.
- ~~Preserve~~Maintain zoning for heavy commercial and light industrial uses in areas to support mixed uses and jobs.
- Establish controls for transient hotels to ensure consistency with the goals and objectives of the rezoning.

An overview of the rezoning area, the purpose and need for the Proposed Actions and their specific components are discussed below. Appendix 1 includes a full list of the blocks and lots that would be affected by the Proposed Actions, while Figures 4a through 4d in the EAS show all of the affected blocks and lots.

The New York City Planning Commission (CPC) has determined that an EIS for the Proposed Actions will be prepared in conformance with City Environmental Quality Review (CEQR) guidelines, with the Department of City Planning acting on behalf of the CPC as the lead agency. The environmental analyses in the EIS will assume a development period of ten years for the Reasonable Worst Case Development Scenario (RWCDs) for the Proposed Actions (i.e., analysis year of 2026) and identify the cumulative impacts of other project in areas affected by the Proposed Actions. DCP will conduct a coordinated review of the Proposed Actions with involved and interested agencies.

B. REQUIRED APPROVALS AND REVIEW PROCEDURES

The Proposed Actions includes discretionary actions that are subject to review under the Uniform Land Use Review Procedure (ULURP), Section 200 of the City Charter, and CEQR process, as follows:

1. Zoning map amendments to rezone portions of existing C4-4, M1-2, R8, C8-3, and R7-1 with R7A, R8A, R9A, R7D, and C4-4D districts and C2-4 commercial overlays.
2. Zoning text amendments to:
 - Establish the Special Jerome Avenue District, coterminous with the Rezoning Area. The proposed special district will include regulations that will add controls to the ground floors of buildings within mapped commercial overlays and districts, modify height and bulk regulations on lots fronting the elevated rail line, modify bulk regulations on irregular lots, and establish controls, such as discretionary review provisions, for transient hotels.
 - Establish proposed R7A, R7D, R8A, R9A, and C4-4D districts as Mandatory Inclusionary Housing areas, applying the Mandatory Inclusionary Housing program to require a share of new housing to be permanently affordable where significant new housing capacity would be created.
3. City Map changes to:
 - Map Block 2520, Lot 19 as parkland. This city-owned parcel is located one block outside of the rezoning area and is bounded by West 170th Street, Nelson Avenue, Shakespeare Avenue, and Corporal Fischer Place in the Highbridge neighborhood of the Bronx, Community District 4.

- De-map Corporal Fischer Place (street) between Nelson Avenue and Shakespeare Avenue, which is adjacent to the parcel to be mapped as park land as described above (Block 2520, Lot 19), and map it as parkland.

City Environmental Quality Review (CEQR) and Scoping

The Proposed Actions are classified as Type 1, as defined under 6 NYCRR 617.4 and 43 RCNY 6-15, subject to environmental review in accordance with CEQR guidelines. An Environmental Assessment Statement (EAS) was completed on August 26, 2016. A Positive Declaration, issued on August 29, 2016, established that the Proposed Actions may have a significant adverse impact on the environment, thus warranting the preparation of an EIS.

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Actions. The process allows other agencies and the public a voice in framing the scope of the EIS. The scoping document sets forth the analyses and methodologies that will be utilized to prepare the EIS. During the period for scoping, those interested in reviewing the Draft Scope may do so and give their comments to the lead agency. Therefore, in accordance with City and State environmental review regulations and methodologies, the Draft Scope of Work to prepare the EIS was issued on August 29, 2016. The public, interested agencies, Bronx Community Boards 4, 5 and 7, and elected officials, ~~were~~are invited to comment on the Draft Scope, either in writing or orally, at a public scoping meeting ~~to be~~ held on September 29, 2016 at Bronx Community College - Gould Memorial Library Auditorium, 2155 University Avenue, Bronx, NY, 10453, starting at 4:00 pm. Comments received during the Draft Scope's public meeting and written comments received up to ten days after the meeting (until 5:00 pm on October 10, 2016), ~~will be~~were considered and incorporated as appropriate into ~~this~~ Final Scope of Work (Final Scope). The lead agency ~~oversaw~~will oversee preparation of ~~this~~ Final Scope, which ~~will~~incorporates all relevant comments made on the Draft Scope and ~~revises~~the extent or methodologies of the studies, as appropriate, in response to comments made during the scoping process and to include any other necessary changes to the scope of work for the EIS. Appendix 9 includes responses to comments made on the Draft Scope of Work. The written comments received are include in Appendix 10. The Draft EIS (DEIS) will be prepared in accordance with ~~this~~ Final Scope.

Once the lead agency is satisfied that the DEIS is complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the land use applications to afford all interested parties the opportunity to submit oral and written comments. The record will remain open for ten days after the public hearing to allow additional written comments on the DEIS. At the close of the public review period, a Final EIS (FEIS) will be prepared that will respond to all substantive comments made on the DEIS, along with any revisions to the technical analyses necessary to respond to those comments. The FEIS will then be used by the decision makers to evaluate CEQR findings, which address project impacts and proposed mitigation measures, in deciding whether to approve the requested discretionary actions, with or without modifications.

C. BACKGROUND

Community Engagement and Interagency Participation

In May 2014, Mayor Bill de Blasio released *Housing New York*, the Mayor's plan to build and preserve affordable housing throughout New York City in coordination with strategic infrastructure investments to foster a more equitable and livable New York City through an extensive community engagement process. The Housing New York plan calls for fifteen neighborhood studies to be undertaken in communities across the five boroughs that offer opportunities for new affordable housing. Jerome Avenue was selected as one of the first neighborhood studies based on the previous planning work in the area and numerous requests from local community boards and elected officials to study the area to leverage the neighborhoods' many assets and to identify opportunities for revitalization of the corridor and the surrounding neighborhoods.

The Jerome Avenue Neighborhood Plan is part of an on-going community engagement process that began in 2014. Along with residents and strong community partners, DCP has worked in coordination with key city agencies, including the Department of Housing Preservation and Development (HPD), Department of Transportation (CDOT), Department of Parks and Recreation (DPR), Department of Small Business Services (SBS), Department of Health and Mental Hygiene (DOHMH), the School Construction Authority (SCA), and other capital and service agencies as appropriate. Together, the project team has conducted a series of informational sessions and workshops beginning in the fall 2014 and throughout the process to engage community stakeholders in identifying current and future needs and creating a clear and cohesive vision for their neighborhoods.

As part of the on-going community engagement process, the City has conducted a multi-faceted outreach approach including focus groups with youth and seniors, mobile office hours, informational interest meetings and outreach sessions with various community-based organizations. Among others this included:— Highbridge Community Development Corporation, New Settlement, WHEDco, Yankasa, BronxWorks, and Davidson Community Center. Public events included Open Houses to educate community stakeholders on the roles and responsibilities of the various agencies, and begin a dialogue on community needs and assets. The Open Houses were followed by a Community Workshop where participants were invited to have a more detailed and meaningful discussion with agency representatives, resulting in the setting and prioritization of community goals. Finally, a Visioning Session was held in which the project team further refined the previously agreed-upon goals while establishing a future vision for the Jerome corridor. Local community boards, area residents, business owners, workers, elected officials and community-based organizations identified goals for *Housing, Community Resources, Jobs and Businesses and Access, Mobility & Circulation*. The community goals task the Plan to:

- Provide sustainable, high-quality, affordable housing with a range of options for residents at all income levels.
- Protect tenants and improve housing quality.
- Ensure every neighborhood has green streetscapes, quality parks and diverse recreation spaces.
- Create greater retail diversity to meet current and growing retail and service needs.
- Prepare residents for job and career growth through job training and skills development.
- Promote and support small businesses and entrepreneurship.
- Support auto-related businesses.
- Promote a safe, walkable area in and around the elevated train.

D. THE JEROME AVENUE NEIGHBORHOOD STUDY AREA HISTORY

The Jerome Avenue Neighborhood Study area includes the neighborhoods of *Highbridge, Mount Eden, Concourse, Mount Hope, University Heights and Morris Heights* located in the Southwest Bronx. Collectively, these neighborhoods represent very dense and stable residential communities that developed during periods of growth in the late 19th and early 20th centuries.

~~The opening~~ One of the defining features of the Jerome Avenue corridor is a built environment shaped by access to transit. In 1917, the completion of the #4 elevated train, in 1917, running rapid transit line along Jerome Avenue served as a catalyst for transit-oriented growth; coming less than twenty years after the consolidation of the five borough region into the City of Greater New York, elevated rapid transit lines like the #4 helped to knit together a vast and largely low-density landscape that had previously been reliant on heavy commuter rail for intracity travel, with its rigid timetables and high fares. Several decades later, the completion of the B/D subway line, in 1940, running underneath beneath the Grand Concourse reinforced and contributed to the provided an additional link to points north and south, serving as a driver of population, economic and civic growth of in the area. The combination of elevated and subway mass transit along with while eliminating many of the local quality of life impacts associated with elevated rail. Coupled with the provision of a sophisticated street car network in the early 20th century, the provision of a robust transit grid prompted large a high rate of population growth, as successive waves of immigrants from afar and in-migrants from Manhattan and elsewhere in the city arrived in this area of the borough. Over time, and mid-density apartment buildings gradually replaced one and two family homes. These dense corridors can still be seen these throughout these neighborhoods today. in the vicinity of the rapid transit lines.

Historically, housing in these neighborhoods did not allow for automobile parking. As a result, the Jerome Avenue corridor, like similar parts of the city, developed as an auto-oriented a service area for the dense surrounding residential neighborhoods characterized by surface parking lots, garages and auto-repair and service shops. The 1961 zoning resolution codified areas like the Jerome Avenue corridor and similar areas around the city as auto-related, which remains in effect for much of the study area today. New uses in these areas have been limited to schools, gyms, low-scale commercial and auto-related sales and repair. This is due in large part to the 1961 zoning which has been in place since 1961, limits regulations that limit commercial and community facility development and does do not permit residential development.

The physical character and image of the study area is largely defined by iconic infrastructure such as the Grand Concourse and Cross Bronx Expressway, the historic Bronx Community College, as well as the area's numerous open spaces. ~~The Grand Concourse serves as the western boundary of the study area and is home to dense neighborhoods. It is a wide, 180-foot wide,~~ north-south thoroughfare ~~which spans~~ spanned built on an elevated structure for part of its length spanning 4 miles of the Bronx and is one ~~its~~ of the borough's defining features. Grand Concourse serves as the eastern boundary of the study area and is home to multiple dense neighborhoods that grew along the B/D transit line throughout the majority of the twentieth century. Some of the finest examples of Art Deco and Arte Modern architecture in the country can be found along the Grand Concourse, and these buildings serve as a testament to the burgeoning upward mobility which could be found in the area in the early part of the 20th century. A majority of this growth, which occurred largely between the opening of the #4 subway service and the beginning of the Great Depression, was comprised of immigrant populations- namely Irish, Italian and Jewish Americans. This immigrant tradition continued on as successive waves of Puerto Ricans, then Dominicans, and today now West African and Mexican immigrants continue to populate the community.

Bronx Community College is located in the northwest portion study area and played an important role in the development of the surrounding neighborhood, University Heights. It is generally bound by 180th Street, University Avenue, Sedgwick Avenue and Hall of Fame Terrace. In 1894 New York University began moving their undergraduate school to the site on top of the heights overlooking the Harlem River, eventually becoming the namesake for the neighborhood itself. During its time in the Bronx the campus became known for its world-class architecture. Its first campus plan was designed by Stanford White; ~~whose~~ of the eminent architecture firm McKim, Meade and White, ~~one of the most famous of the time,~~ and modernist architect Marcel Breuer led the 1950's campus expansion. -The University influenced the form and function of buildings many of which can be seen today around the campus along University Avenue. -Today it has an enrollment of over 11,000 students, is part of the City University of New York (CUNY) system and is almost exclusively a commuter college.

Several important City parks helped define the development of the surrounding neighborhoods. Aqueduct Walk is a pedestrian trail along the right-of-way of the former Croton Aqueduct. It's located approximately a half block east of University Avenue, it extends northward through Kingsbridge Road where it connects to additional sections and southward to where it meets the High Bridge. The High Bridge originally carried water from the Croton Aqueduct and is the namesake for the Highbridge neighborhood. In 2014 it was reopened by the Department of Parks and provides pedestrian access from the Highbridge ~~Neighborhood~~ neighborhood to Manhattan. Crotona Park is a thirty-eight acre park, originally part of the Morris estate, located east of the Grand Concourse and south of Mt. Eden Parkway and serves the southeastern study area.

One of the defining physical characteristics of the study area is the eight-lane, below grade Cross Bronx Expressway; an infrastructural chasm etched through the center of the study area, separating community Boards 4 and 5. Part of Robert Moses's massive urban renewal program in New York City, construction of the Expressway began in 1943 and was completed in 1963. Construction caused massive displacement, and bisected a number of tight knit, thriving communities. Decades later, the expressway remains a physical divider of neighborhoods. In the decades that followed, the Southwest Bronx experienced

disinvestment and population loss. Only within the last few decades were these trends finally reversed. Today, the population of the study area's surrounding neighborhoods total more than 345,000 residents. This represents a larger population than many large U.S. cities including Pittsburgh, PA and St. Louis, MO.

Rezoning Area

The Proposed Actions would rezone an approximately ~~73-92~~-block area which spans approximately 151 acres along Jerome Avenue and is generally bounded by E 165th Street to the south and 184th Street to the north; the affected area also includes portions of Edward L. Grant Highway, E 170th Street, Mount Eden Avenue, Tremont Avenue, Burnside Avenue and E 183rd. The area is defined by Jerome Avenue which runs north-south and from East 165th Street to East 184th Street and east-west connections which comprise the commercial corridors and provide key connections throughout the study area.

River Avenue, 165th Street – 168th Street

Representing the southernmost portion of the study area, River Avenue between 165th and 168th sits beneath the elevated 4 train, before the track meets Jerome Avenue at 168th Street. The area is walking distance to Yankee Stadium to the south and contains the large, regionally-serving, Mullaly Park. The area is zoned as an R8 district, allowing the highest density of any existing designation in the study area. There are C2-4 commercial overlays mapped along River Ave. between McClellan Street and 167th street. Land uses in the area range from surface parking lots to large, mixed-use apartment buildings, to single-story retail buildings at 167th Street. There is an elevated rail station for the 4 train and 167th and River Avenue.

Edward L. Grant Highway

Defining the western edge of the study area's southern portion, Edward L. Grant Highway runs north/south between 167th Street to the south, to the Cross Bronx Expressway to the north, at which point it turns into University Avenue. The wide, 4-lane boulevard cuts through three distinct zoning districts: C8-3, M1-2, and R7-1. A commercial overlay is mapped continuously along the winding street north of 170th Street.

Edward L. Grant Highway is home to a number of large apartment buildings, most recently a 130-unit project developed in conjunction with HPD just north of Plimpton Avenue. Additionally, there is a 10 story, 60-unit mixed-use residential and commercial development currently under construction at the southeast corner of the Edward L. Grant Highway and Plimpton Avenue. The BX35 bus runs along Edward L. Grant highway and provides connections west into Manhattan and east through Morrisania to the Foxhurst neighborhood.

Jerome Avenue, 169th Street – Cross Bronx Expressway

As Jerome Avenue runs between 169th to the south and Cross Bronx Expressway to the north, it is mapped with a variety of zoning districts, the most prominent of which include an M1-2 district to the west of Jerome below 170th Street and a C8-3 district north of 170th street, extending from the eastern frontage

of Jerome Avenue to Macombs Road on the west. The M district contains a variety of uses including self-storage, an ironworks, a Department of Sanitation facility, as well as a number of warehouse and automotive uses. The C8-3 district includes a variety of automotive repair facilities, a livery service and parking uses as well as a number of large apartment buildings and a newly constructed Blink Fitness facility. There is also an R8 with a commercial overlay mapped on the east side of Jerome between 169th and 170th containing neighborhood-serving commercial uses such as small restaurants, a small market, beauty stores and a general goods store. Finally, there is a small portion of an R7-1 district mapped with a commercial overlay along Jerome Avenue at Mr. Eden Avenue which includes similar neighborhood-serving retail and commercial uses.

Major institutions within this portion of the study area include the NYPD 44th Precinct located at the southeast corner of 169th and Jerome, and the newly built New Settlement Community Campus (includes three schools and a community center) located at Jerome Avenue and Goble Place. Bronx Lebanon Hospital is located across east of the Grand Concourse between Mt. Eden Avenue and 173rd Street. The area is also served by four parks: Keltch Park at 170th and Jerome; Goble Playground, west of Jerome Avenue on Goble Place; Inwood Park, a hardscaped plaza located on Mount Eden Avenue; and Jerome Playground South, a handball court on Jerome Avenue, just south of the Expressway.

There is an elevated rail station for the 4 train and Jerome and Mt. Eden Ave. The Bx11 and BX18 serve as east/west bus connections. With exception of the buses running along the Grand Concourse, there is no north/south bus service within this portion of the study area.

170th Street Commercial Corridor

170th Street serves an important lateral connection through the study area between Edward L. Grant Highway on the west and the Grand Concourse on the east. A C4-4 District is mapped between the Grand Concourse and Jerome, and the street splits an existing M district on the south side and C8 district on the north side, where it eventually meets an R7-1 district mapped with a commercial overlay at from Cromwell Avenue to Edward L. Grant.

The 170th Street commercial corridor between the Concourse and Jerome Avenue is one of the most active commercial areas in the study area. Generally speaking, uses are locally-serving and located in low-scale, one- and two-story buildings. Along the northern frontage of 170th between Walton and Jerome are a number of larger, mixed-use apartment buildings with ground floor retail.

West of Jerome, to Edward L. Grant, 170th is characterized by uses more reflective of the limitations of the underlying C8-3 and M1-2 district which splits the street. These include a self-storage, surface parking lot, a livery cab service, interspersed automotive uses and the Volunteers of America.

There is an elevated rail station for the 4 train and Jerome and 170th Street, in addition to the Bx11 and BX18 bus lines, making this one of the study area's more transit-rich nodes.

Jerome Avenue, Cross Bronx Expressway – Tremont

North of the Cross Bronx Expressway, Jerome Avenue is lined with a mix of commercial uses including

auto repair shops, gas stations, parking facilities and car washes. The corridor here also includes some neighborhood-serving retail such as hardware stores and general merchandise shops, as well as local restaurants. Two built, and one planned, supportive housing developments are located here. The area's land use mix is a result of the underlying, C8-3 zoning. The exception in this designation is between 176th street and 177th street (eastern block-frontage) where the zoning designation is R7-1 with a C2-4 overlay.

One of the overarching goals of the Plan has been to foster economic development and support local businesses, including automotive uses. Due to the density of automotive uses, access to the Cross Bronx Expressway and underlying site conditions, two discrete portions of the study area have been identified as logical for preserving their existing C8-3 zoning designations.

The dense residential neighborhoods of Morris Heights and Mt. Hope are located to the west, and east of Jerome Avenue, respectively. Several step streets connect these neighborhoods with the corridor including step streets at Davidson Avenue, Clifford Place and 176th Street. The area is not well-served by buses, but there is a 4-train stop at 176th Street.

Tremont Avenue and Burnside Avenue Commercial Corridors

Burnside Avenue is the most vibrant commercial corridor in the northern portion of the Study Area. An R7-1 district and an R8 district are mapped west and east of Jerome Avenue, respectively- each mapped with a C1-4 commercial overlay. Apparel stores, restaurants, banks, electronic stores, grocery stores, among other commercial uses are typical in this portion of the Study Area. Housing is also permitted, and a significant, affordable project is currently under construction at the corner of Burnside and Creston Avenues. The project will include a total of 113 units achieving a broad range of affordability (serving families making 30% AMI – 90% AMI).

The area is well-served by transit including the Bx32, BX40, BX42, and BX36. Additionally, the 4-train stops at Burnside Avenue. Open spaces include Mt. Hope Garden, Devanney Triangle and Aqueduct walk.

Major institutions here include educational, community and health facilities. PS 306/MS 331 located on Tremont Avenue, west of Jerome. The Davidson Community Center is located on Davidson Avenue, just off of Burnside. Additionally, the Morris Heights Health Center operates two facilities west on Burnside Avenue. Finally, Bronx Community College, one of the borough's more significant institutions of higher learning, is located just west of the Study Area.

Jerome Avenue, 181st Street – 184th Street

Jerome Avenue between 181st and 184th Street represents the northern-most portion of the study area. Today, it is mapped exclusively as a C8-3 zoning district, with the exception of the lateral portion of the 183rd street corridor which is mapped as R7-1 to the west and R8 to the east, each with C1-4 commercial overlays. Reflective of the zoning, automotive uses persist within this portion of the study area, along with various retail uses, two prominent self-storage facilities, and a number of legally non-conforming large mixed, residential buildings. There is also an FDNY EMS station and Public School 315.

This portion of the study area is served by the BX32 bus, running along Jerome Avenue, as well as the 4-

train, with a stop at 183rd Street.

Previous Planning Efforts

Over the last ten years, local Community Boards and various City agencies, including DCP, CDOT and New York City Mayor's Office of Environmental Remediation (OER) in collaboration with the community have developed a number of studies geared toward the revitalization of Jerome Avenue and the surrounding neighborhoods. These studies include: *Bronx Community Board 5 Section 197-a Plan Phase I Summary Report (2002)*, *Place-Based Community Brownfield Planning Foundation Report on Existing Conditions-Jerome Avenue Corridor 2013* and *The Jerome Avenue Transportation Study 2015*. Each of these studies described below support the Jerome Avenue Neighborhood Plan, however there has yet to be comprehensive planning process for the entire study area.

Bronx Community Board 5 Section 197-a Plan Phase I Summary Report (2002)

In 2002, Community Board 5 established a framework to continue the revitalization of the district and build upon the goals established as part of their Development Plan in 2000. The scope included the continued development of housing to replenish the existing stock which had been depleted by years of neglect and abandonment, revitalization of the central business district, improvements to existing neighborhood parks, increased opportunities for youth and seniors, investments to improve the local street network including step streets, leverage city-owned property for housing and open space opportunities and improve access to the Harlem River. While the 197-A plan was never formally completed the key elements identified in the scoping document continue to guide discussions focused on planning and infrastructure investments throughout Community District 5.

Jerome Avenue Transportation Study (2013)

At the request of Bronx Community Boards 4 and 5 in response to growing traffic congestion in the area and to address mobility and safety for all street users (motorists, cyclists, pedestrian, and transit In 2013, city DOT conducted a study of existing and future traffic conditions including demographics, zoning & land use, traffic, goods movement, pedestrians & bicycles, accidents & safety, parking and public transportation. The study area is bounded by 181st Street in the north 172nd Street in the south the Grand Concourse to the east and Martin Luther King Boulevard/University Avenue to the west. The goals of the study were to reduce traffic congestion, improve internal traffic circulation, streetscape, and enhance safety for all road uses with effective community participation. The study objectives are as follows:

- Assess the existing and future travel and traffic conditions;
- Identify constrains to internal vehicular and pedestrian circulation with specific emphasis on limited crossings over Cross Bronx Expressway;
- Develop a package of recommendations with improvement measures to reduce vehicular congestion, improve pedestrian access and circulation, enhance safety for all street users (vehicles, pedestrians, bicycles) and general streetscape; and
- Foster a sense of community support through extensive public participation.

Several of the proposed recommendations have been completed while others are still on-going.

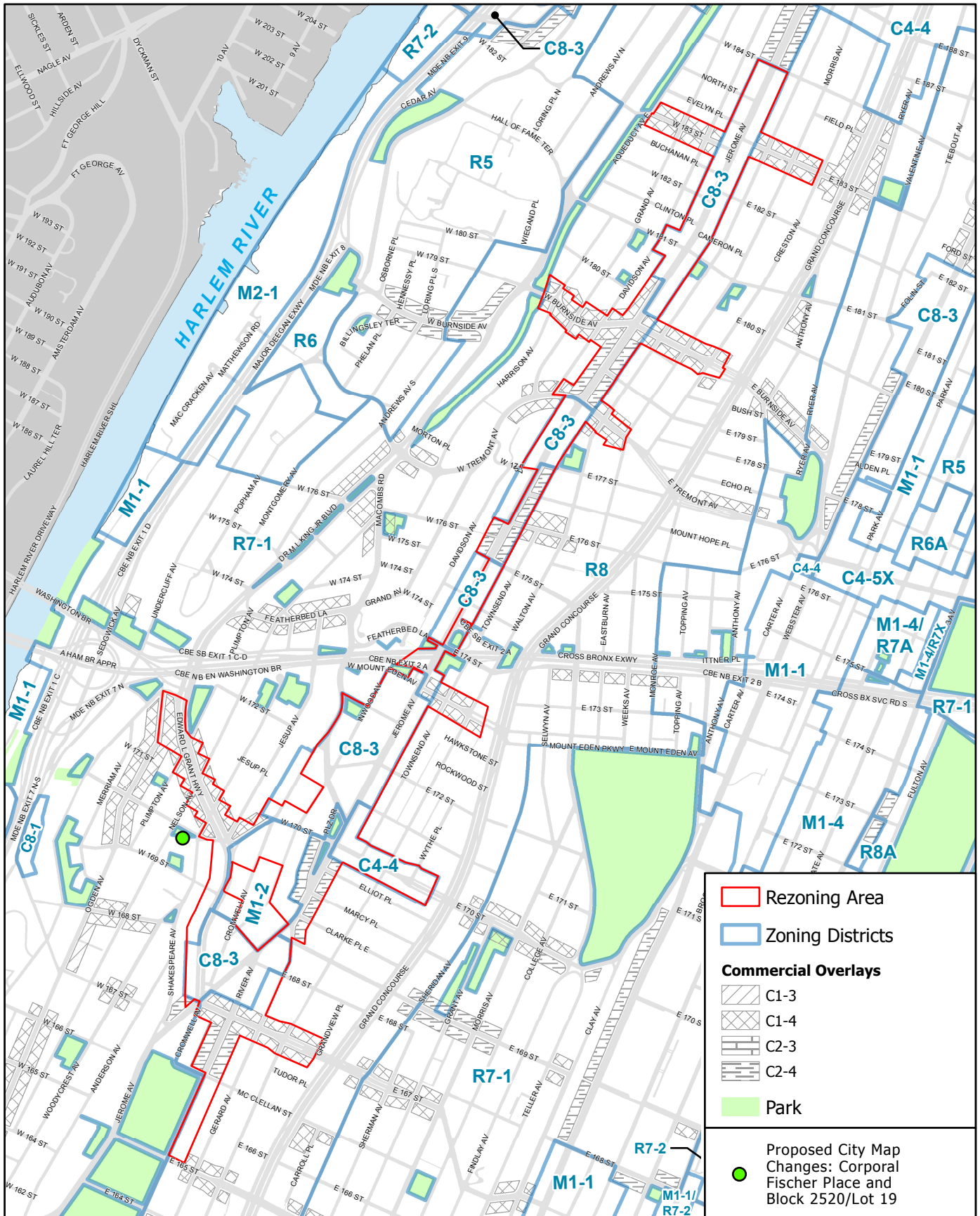
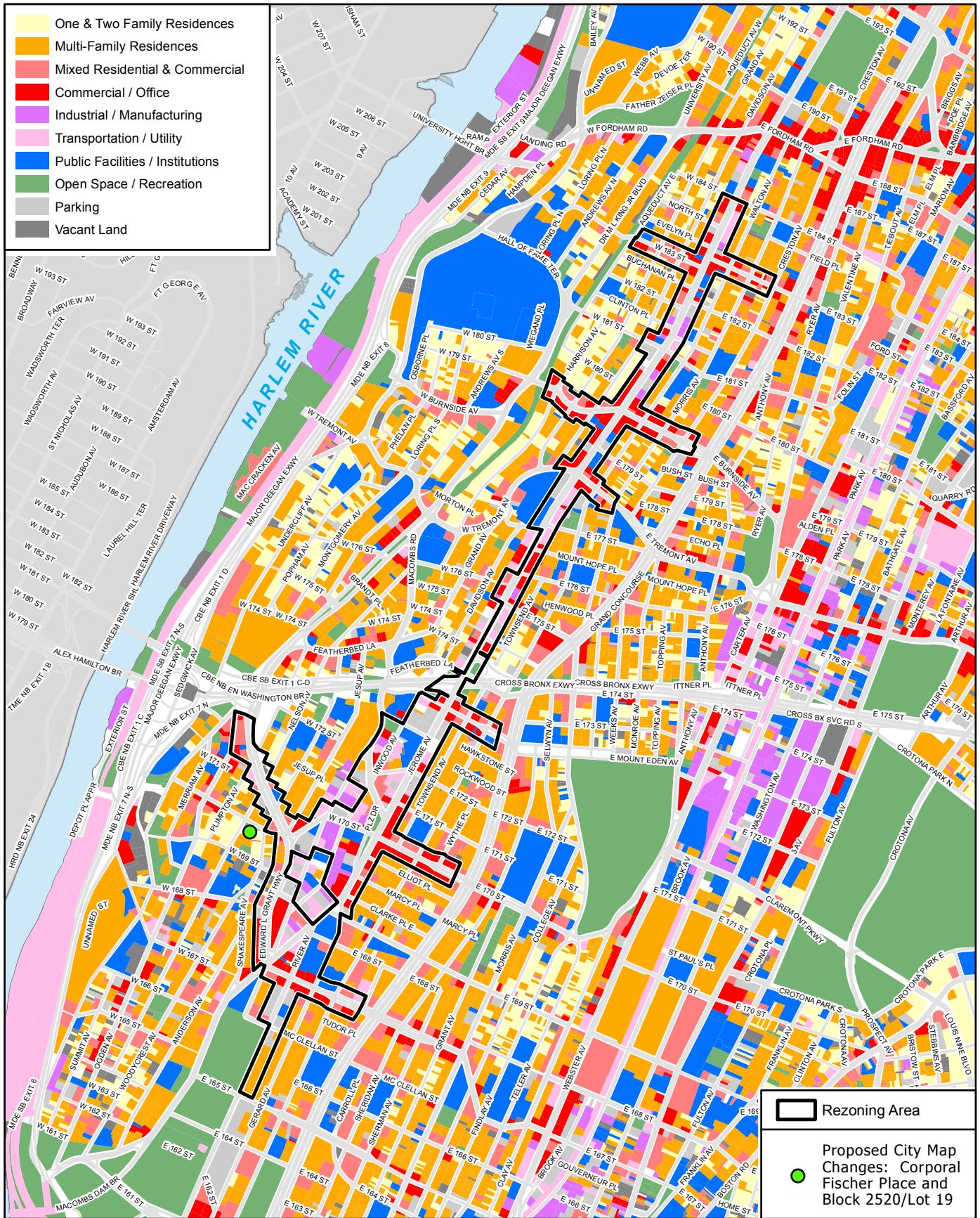


Figure 2



Source: New York City Department of City Planning, MapPLUTO, 2015 March-June; STV Incorporated, 2016.

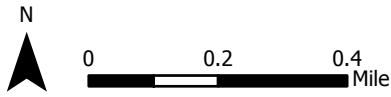


Figure 3

It is important to note that while not part of the proposed actions the Plan builds upon the recommendations and goals identified in the 2013 transportation study and will include comprehensive strategies and significant investments to improve the public realm, pedestrian safety and walkability.

Place-Based Community Brownfield Planning Foundation Report on Existing Conditions-Jerome Avenue Corridor (2015)

In 2013 DCP in collaboration with the New York City Mayor's Office of Environmental Remediation (OER) completed an existing conditions report of area-wide brownfield sites. This existing conditions report, commissioned by OER provides an overview of the study area's geologic and natural features, historical development patterns, zoning, land use and infrastructure, demographic and economic profiles, a summary of environmental conditions and a preliminary evaluation of potential strategic properties. The study area is bounded by West Mt. Eden Avenue to the north, the intersection of Cromwell and Jerome Avenues to the south, Jerome Avenue to 170th Street to the Grand Concourse to the east and Edward L. Grant Highway and Jesup Avenue to the west.

This report was the result of on-going efforts by the DCP with support from local organizations, Community Board 4 and elected officials to study the Jerome Avenue Corridor with a focus on revitalization and economic development. Community Board 4 identified the Jerome Avenue Area as a priority area in their District Needs Statements from 2013-2016.

E. EXISTING ZONING

The existing zoning within the proposed rezoning is composed of seven zoning districts: C8-3, M1-2, C4-4, R7-1, R8 and C1-4 and C2-4 commercial overlays. (See Figure 2, "Existing Zoning.")

C8-3

Approximately 33 full or partial blocks in five discrete areas are currently zoned C8-3:

- An area bounded by West 169th Street, Jerome Avenue and Edward L. Grant Highway
- An area bounded by West 170th Street, Mount Eden Avenue, Jerome Avenue and Cromwell Avenue
- An area bounded by East 175th Street, Featherbed Lane, Townsend Avenue and Davidson Avenue
- An area bounded West Tremont Avenue, East 176th Street, Davidson Avenue, Townsend Avenue and Walton Avenue
- An area bounded by East 184th Street, Burnside Avenue, Davidson Avenue and Walton Avenue

~~C8-3 commercial zoning districts are general service districts that allow community facility uses in Use Group 4 and commercial uses in Use Groups 5 through 14 and 16. The most prevalent uses in C8 districts are automotive and heavy commercial uses such as auto repair and showrooms, warehouses, gas stations~~

~~and car washes, mapped along five separate portions of Jerome Avenue. C8-3 districts permit commercial uses at a maximum permitted FAR of 2.0 and community facility uses at a maximum permitted FAR of 6.5. The maximum building height is determined by the sky exposure plane, which begins at a height of 60 feet, or 4 stories, whichever is less, above the street line. Towers are permitted to penetrate the sky exposure plane for community facility uses. Off-street parking requirements vary with the use, but typically require one accessory parking space. Unlike most commercial districts, residential uses are not permitted in C8 districts. C8 districts are found mainly along major traffic arteries and allow automotive and other heavy commercial uses that often require large amounts of land. Like M1-1 and M1-2 districts, C8-3 districts utilize a sky exposure plane beginning at a particular base height (60 feet in C8-3 districts) and requires little parking, typically 1 space per 1,000 square feet of commercial space. Typical uses are automobile showrooms and repair shops, gas stations, car washes, community facilities, warehouses, self-storage facilities, hotels, and amusement establishments such as movie theaters. Residential uses are not permitted.~~

Existing uses in these areas include gas stations, livery companies, auto sales, auto repair, auto body, auto glass, car audio sales, parking garages, surface parking lots, community facilities, single-story retail, 6-8 story residential buildings and mixed used buildings with ground floor retail with residences above. Recent developments include a school, two gyms and single story commercial.

M1-2

~~Approximately four full and partial blocks are zoned M1-2 along the southern portion of the rezoning area bounded by West 170th Street, West 169th Street, Edward L. Grant Highway and Inwood Avenue. M1-2 districts permit some community facility uses in Use Group 4 such as hospitals, houses of worship and ambulatory health care facilities, commercial uses in use Groups 5 through 14 and 16, and manufacturing uses in Use Group 17. If the performance standards for noise, vibration, particulates, odors, and other noxious uses are met, then Use Group 18 uses are permitted as well. Commercial and manufacturing uses are permitted a maximum FAR of 2.0 FAR and community facilities are permitted 4.8. The maximum building height is determined by the sky exposure plane, which begins at a height of 60 feet, or 4 stories, whichever is less, above the street line. M1-2 districts permit manufacturing and commercial uses at a maximum FAR of 2.0. M1-2 districts also permit community facility uses at a maximum FAR of 4.8. M1 districts have a base height limit, above which a structure must fit within a sloping sky exposure plane; this base height is 60 feet, or 4 stories, whichever is less, in M1-2 districts. M1-2 districts are subject to parking requirements based on the type of use and size of an establishment. M1-2 districts generally allow one- or two-story warehouses for light industrial uses, including repair shops and wholesale service facilities, as well as self-storage facilities and hotels. M1 districts are intended for light industry; however, heavy industrial uses are permitted in M1 districts as long as they meet the strict performance standards set forth in the Zoning Resolution of the City of New York (ZR). Off-street parking requirements vary with the use, but typically require one parking space for every three employees or every 1,000 square feet of floor area, whichever requires more spaces for manufacturing uses and one accessory parking space per 300 square feet of commercial space. Residential No new residential uses are not permitted.~~

Existing uses include a mix of low-rise commercial, industrial, self-storage and community facility uses and

low-scale residential buildings.

C4-4

Approximately six partial blocks are zoned C4-4 along East 170th Street bounded by the Grand Concourse and Jerome Avenue.

~~C4-4 zoning districts are regional commercial districts, which permit uses such as specialty, and department stores that serve a larger area and generate more activity than local retail. Use Groups 5, 6, 8, 9, 10, and 12, which include most retail establishments, are permitted in C4 districts. Uses that would interrupt the desired continuous retail frontage, such as Use Group 7 (home maintenance and repair service stores), are not allowed. C4-4 districts permit The C4-4 district permits commercial uses ~~with~~ a maximum FAR of 3.4. Residential residential uses are permitted up to a maximum FAR of 3.44, (or 4.0 for Quality through the Inclusionary Housing buildings on wide streets Program), and community facility uses are permitted facilities at a maximum FAR of 6.5. Height and setback regulations depend on the configuration of uses.~~ Generally, buildings in C4-4 districts are governed by a sky exposure plane, which, for commercial or community facility uses, begins at a height of 60 feet, or 4 stories, whichever is less, above the street line. Towers are permitted to penetrate the sky exposure plane for community facility uses. Residential uses are permitted to either be constructed pursuant to height factor regulations or pursuant to the Quality Housing Program under a residential equivalent of an R7-2 district. If the residential portion of the building is constructed pursuant to Quality Housing, the entire building must comply with the height limitations. On wide streets outside Manhattan Core, this would be a height limit of 85 feet for buildings with a qualifying ground floor (one with a height of at least 13 feet), and a height limit of 75 feet on narrow streets, when located outside of Inclusionary Housing areas. Off-street parking is required for 50% of the dwelling units, which may be reduced to 30% for lots less than 15,000 square feet and waived for lots less than 10,000 square feet. No parking is required for income-restricted housing units, and where the total residential parking required is less than 15 spaces, the requirements may be waived. Parking for commercial uses vary by use but typically requires one space per 1,000 square feet, and may be waived if the requirement is less than 40 spaces.

Existing uses include single story retail, community facility uses and 6-8 story apartment buildings with ground floor retail.

R7-1

~~Approximately twenty eight full or partial blocks are zoned R7-1; along Edward L. Grant Highway between Jessup Avenue and University Avenue and along Jerome Avenue from East 170th Street to East 169th Street, from Mount Eden Avenue to East 174th Street and from East 76th Street to East 177th Street. An R7-1 is a mid-density residential district, which allows residential and community facility uses. There is no fixed height limit and building envelopes are governed by either height factor regulations or the Quality Housing Program. Residential developments using the optional Quality Housing program are allowed a maximum FAR of 3.44 on narrow streets and 4.0 on wide streets with maximum building heights of 75 and 85 feet (with a qualifying ground floor), respectively, outside of Inclusionary Housing areas. Residential developments using height factor regulations would maximize their FAR of 3.44 at a height factor of 13,~~

and their height would be governed by a sky exposure plane beginning at a height of 60 feet, or 6 stories, whichever is less, above the street line. Community facility uses are permitted a maximum FAR of 4.8, but in buildings with mixed residential and community facility uses, is limited to 1 FAR.

R7 districts are medium-density apartment house districts. The Height Factor regulations for R7 districts encourage taller buildings with less lot coverage on larger lots. The optional Quality Housing regulations allow for lower buildings with greater lot coverage. Off-street parking is required for 60% of the dwelling units or 50% of the dwelling units under the Quality Housing program. This can be further reduced to 30% on lots less than 10,000 square feet. No parking is required for income-restricted housing units, and where the total residential parking required is less than 5 spaces, the requirements may be waived.

Under Height Factor regulations, R7 districts permit residential development at a maximum FAR of 3.44. Under R7 Height Factor regulations, buildings have no fixed height limits and building envelopes are regulated by a sky exposure plane and open space ratio. Maximum building height is determined by the sky exposure plane after a maximum base height of 60 feet or 6 stories (whichever is less). Community facility uses are permitted in R7-1 districts up to a maximum FAR of 4.8.

Under R7 Quality Housing regulations, buildings have a maximum residential FAR of 3.44 on narrow streets (i.e., less than 75 feet wide), with a maximum base height of 65 feet and a maximum building height of 75 feet; buildings have a maximum residential FAR of 4.0 within 100 feet of wide streets (i.e., 75 feet wide or greater) with a maximum base height of 75 feet and a maximum building height of 85 feet (with a qualifying ground floor). Community facility uses are permitted in R7-1 districts up to a maximum FAR of 4.8.

Existing uses include a mix of low-rise commercial, industrial, and community facility uses and low-scale residential buildings.

R8

Approximately 38 full and partial blocks are zoned R8; from McClellan Street to East 168th Street from Grandview Place to Jerome Avenue, from East 169th Street and West 170th Street along Jerome Avenue, Mount Eden Avenue from Walton Avenue to Jerome Avenue, East Tremont Avenue from Morris Avenue to Jerome Avenue, Burnside Avenue from Creston to Walton Avenue and East 183rd Street from Creston Avenue to Walton Avenue. An R8 district is a high-density residential district that allows residential and community facility uses. Residential developments using the optional Quality Housing program are allowed a maximum FAR of 6.02 on narrow streets and 7.2 FAR on wide streets with maximum building heights of 115 and 135 feet outside the Manhattan Core, respectively. Residential developments using height factor regulations would maximize their FAR of 6.02 at a height factor of between 17 and 20, and their height would be governed by a sky exposure plane beginning at a height of 85 feet, or 9 stories, whichever is less, above the street line. Community facility developments are permitted a maximum FAR of 6.5, and are permitted a tower if they are not Quality Housing buildings. R8 districts are higher-density residential districts that allow for apartment buildings ranging from mid-rise, eight- to ten-story buildings to much taller buildings set back from the street on large zoning lots. New buildings in R8 districts may be developed under either Height Factor regulations or the optional Quality Housing regulations. Off-

street parking is required for 40% of the dwelling units, which may be reduced to 20% for lots less than 15,000 square feet, and waived for lots less than 10,000 square feet. No parking is required for income-restricted housing units, and where the total residential parking required is less than 15 spaces, the requirements may be waived.

Under Height Factor regulations, R8 districts permit residential development at a maximum FAR of 6.02. Under R8 Height Factor regulations, buildings have no fixed height limits and building envelopes are regulated by a sky exposure plane and open space ratio. Maximum building height is determined by the sky exposure plane after a maximum base height of 85 feet or 9 stories, (whichever is less). Community facility uses are permitted in R8 districts up to a maximum FAR of 6.5.

Under R8 Quality Housing regulations, buildings have a maximum residential FAR of 6.02 on narrow streets (i.e., less than 75 feet wide), with a maximum base height of 85 feet and a maximum building height of 115 feet; buildings have a maximum residential FAR of 7.2 within 100 feet of wide streets (i.e., 75 feet wide or greater) with a maximum base height of 95 feet and a maximum building height of 135 feet (with a “qualifying ground floor”). Community facility uses are permitted in R8 districts up to a maximum FAR of 6.5.

Existing uses include a mix of low-rise commercial, industrial, and community facility uses and mixed use buildings.

C1-4 and C2-4 Commercial Overlays

C1-4 and C2-4 commercial overlays are mapped along portions of East 167th Street, Edward L. Grant Highway, Jerome Avenue, Mount Eden Avenue, East 176th Street, Burnside and Tremont Avenues and East 183rd Street. C1-4 and C2-4 districts allow for local retail uses and commercial development up to 2.0 FAR. ~~C1-4 and C2-4 districts allow residential uses, community facility uses, and commercial uses listed in Use Groups 6 – 9 and 14, which includes uses such as plumbing and electrical shops, small bowling alleys and movie theaters, funeral homes, small repair shops, printers, and caterers. For general commercial uses, one off-street parking space is required for every 1,000 square feet of such use, and up to 40 spaces may be waived.~~

Commercial overlays are mapped along streets that serve local retail needs and are found within residential districts. Typical uses include neighborhood grocery stores, restaurants, and beauty parlors. In mixed use buildings, commercial uses are limited to one or two floors and must always be located below the residential use. C1-4 and C2-4 commercial overlays are mapped within the primary study area over both R7-1 and R8 residential districts. For general commercial uses, one off-street parking space is required for every 1,000 square feet of such use, and up to 40 spaces may be waived.

C1-4 commercial overlays are mapped on the block frontages along 183rd Street, Burnside Avenue, East Tremont Avenue, East Mount Eden Avenue, Edward L. Grant Highway, and East 167th Street. The maximum commercial FAR is 2.0 for C1 commercial overlays mapped in R7 and R8 districts.

C2-4 commercial overlays are mapped on the block frontages along portions of Jerome Avenue between Burnside Avenue and Tremont Avenue, 177th Street and 175th Street, West 170th Street and East 169th Street, and 167th Street and McClellan Street. C2 commercial overlays permit a slightly wider range of uses than C1 districts, such as funeral homes and repair services. The maximum commercial FAR is 2.0 for C2 commercial overlays mapped in R7 and R8 districts.

F. PURPOSE AND NEED FOR THE PROPOSED ACTIONS

The Department of City Planning is proposing land use actions in response to the planning framework identified in the Jerome Avenue Neighborhood Plan. The Plan, part of a long standing request to study land use patterns in the area by community stakeholders, was the outcome of a comprehensive community engagement process. The Proposed Actions are intended to facilitate a development pattern which meets the long term community vision for the Jerome Avenue corridor as a mixed use residential and commercial activity center which supports the needs of the surrounding neighborhoods. These actions are intended to work in unison with the comprehensive set of strategies put forth in the Plan.

The current land use pattern along the Jerome Avenue corridor dates back almost a hundred years when the area was developed to accommodate parking for the nearby dense residential developments. At the time the residential communities were developed, parking was not permitted in residential buildings, and the Jerome Avenue corridor became a service district for these communities. The 1961 zoning helped freeze this land use pattern in place. Still today, much of this zoning does not permit the full range of options to fulfill the vision of the Jerome Avenue Neighborhood Plan. Residential development is currently not permitted in key nodes along the corridor and in areas that can accommodate growth and density. Commercial and retail development is limited in many parts of the study area. The streetscape is inconsistent as it is interrupted by uses that illegally occupy the sidewalk and the street and do not promote pedestrian safety or walkability. Many areas where residential development is permitted are characterized by underutilized properties developed with single-story commercial uses.

Current zoning of C8-3 and M1-2 districts do not permit these types of uses along much of the corridor. Instead, the current zoning designations manifest in very heavy commercial uses that often block sidewalks, encourage vehicles to cross into auto shops and parking garages, operate in bays and behind heavy gates removing “eyes from the street”, and produce extreme levels of noise, all of which are generally incompatible with a strong pedestrian experience. The Proposed Actions will facilitate the development of vibrant, mixed-use buildings with active ground floors that promote retail continuity and a consistent streetscape, with a wide variety of local retail and services to support the surrounding neighborhoods. In addition they will support regional commercial uses in a targeted, transit-rich location and the facilitation of new open space to serve areas residents and workers. As the rezoning area is home to very few publically-owned sites, new opportunities for affordable housing along Jerome Avenue will only be unlocked through permitting housing as a legal use in zoning. Mapping residential districts where no housing was previously allowed, will provide quality housing options for current and future residents at a range of income levels.

Beyond the development that will be permitted as a result of the proposed actions, the Jerome Avenue Neighborhood Plan will protect existing tenants to preserve affordability; support small businesses and entrepreneurs; provide targeted public realm investments and service provisions that improve overall quality of life for residents. These benefits will be the direct result of the Jerome Avenue Neighborhood Plan. While they are not directly tied to the proposed land use actions and will not be analyzed as part of the environmental review, they will have immediate and significant benefits to the community and quality of life of its residents.

The Jerome Plan is more than a sum of its land use actions, but the actions drive the integration of all Plan elements and are integral to its implementation and success. They reflect DCP's on-going community engagement process with local Community Boards, community residents, business owners, community-based-organizations, elected officials, and other stakeholders, to achieve the following land use objectives:

- Provide opportunities for high quality, permanent affordable housing with options for tenants at a wide range of income levels;
- Ensure that any new construction fits visually and architecturally into its surrounding neighborhood context;
 - Anchor-Increase the Jerome opportunities to diversify neighborhood retail and services.
- Permit more density and a broader range of uses in two nodes to anchor the corridor and surrounding neighborhoods by permitting more intensive uses in two nodes;
- Create special rules for new development along the elevated rail line to provide light and air along the corridor and ensure adequate distance between residential uses and the train;
- Create special rules for new buildings and street wall continuity and relief on irregular lots.
- Promote active>Create a walkable, inviting commercial corridor by promoting non-residential ground floor uses and diverse retail to support community needs and provide a consistent streetscape throughout the corridor;
- Preserve Maintain zoning for heavy commercial and light industrial uses in areas to support mixed uses and jobs; and
- Establish controls for transient hotels to ensure consistency with the goals and objectives of the rezoning.

Provide opportunities for the creation of new, permanent affordable housing with options for low- and moderate-income residents, while preserving the character of existing residential neighborhoods

Today, Community Districts 4 and 5 are characterized by stable housing. Eighty percent of the housing stock was built prior to 1947. Two-thirds of the housing in Community Districts 4 and 5 is government regulated. Currently, the median household income of the surrounding area is approximately \$25,900. Conversely, nearly 25% of households earn more than \$50,000 annually.

The proposed actions will support the development of new permanently affordable housing construction by mapping new zoning districts to permit residential development in areas where it is not permitted today and to increase residential density where it is permitted today. The Jerome Avenue corridor and

surrounding streets are characterized by a significant number of underutilized sites with capacity for significant growth. Zoning changes, including the application of the new Mandatory Inclusionary Housing (MIH) program, to allow residential development where none is currently permitted, as well as permit residential development at higher densities where it is already permitted would facilitate expansion of the neighborhood's supply of affordable housing and the construction of new permanently affordable housing development along on the corridor.

The area's existing housing stock is predominantly rent-regulated. New multifamily development in the vicinity of the study area has consisted predominantly of publicly subsidized affordable housing development. While some unsubsidized construction has been observed in smaller buildings, past and recent development trends have been that the majority of housing developed in the area has been publicly subsidized, and this trend is expected to continue. Between 2005 and 2015, more than 80% of all new multifamily housing units in Community Districts 4 and 5 were subsidized affordable units. Between July 2003 and the end of 2015, HPD financed the new construction of almost 4,500 homes and preserved over 8,500 affordable homes in this area.

The zoning proposal has been crafted to promote new development specifically along major corridors that currently contain very few residential units. Residential areas in the surrounding neighborhood are not being rezoned to allow for greater density, in recognition of the existing character of these residential areas, and the rezoning will not promote additional development in these areas.

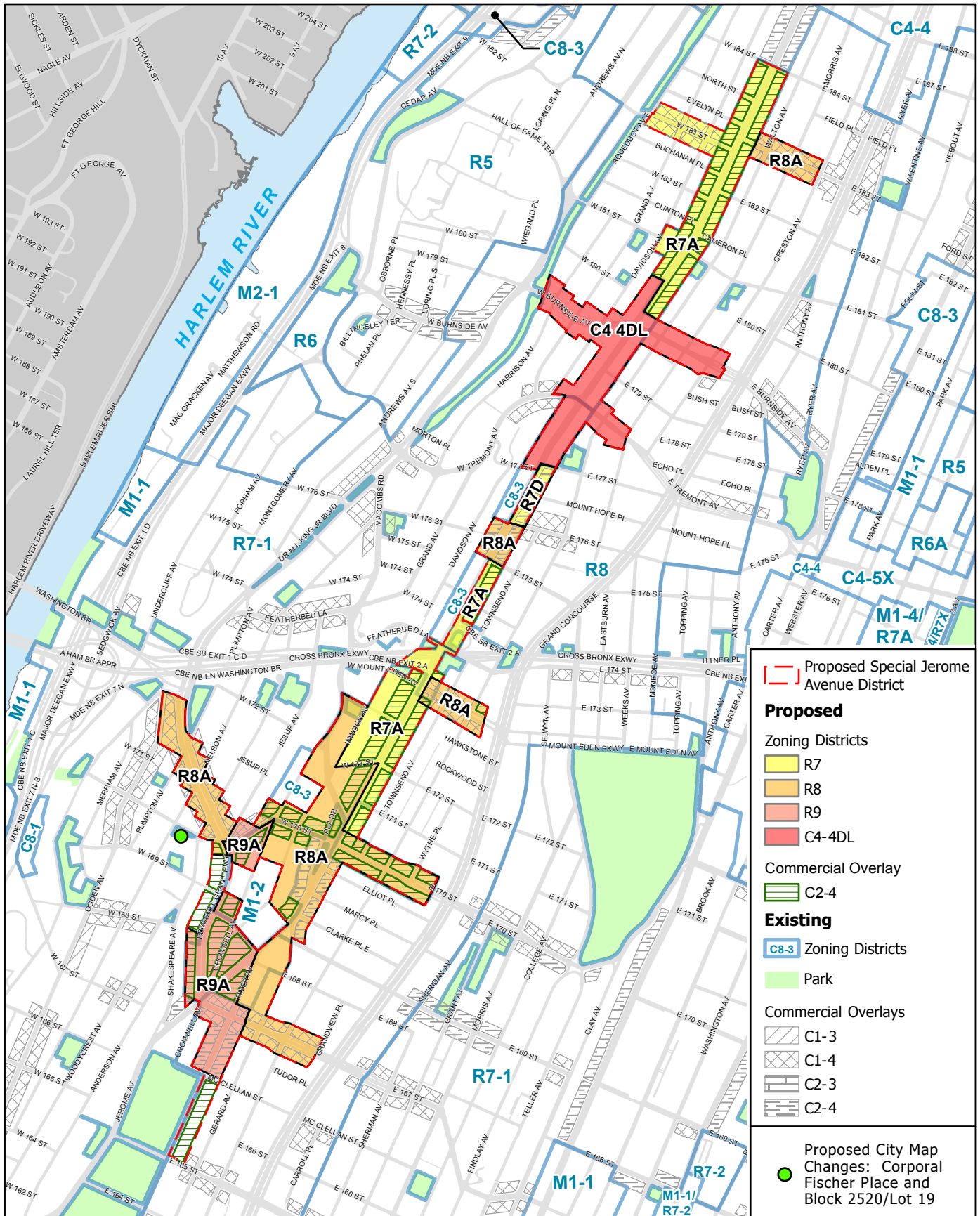
Within the rezoning area, it is expected that a variety of City and State financing programs for affordable housing would be utilized and result in the creation of a substantial amount of affordable housing under the Proposed Actions. In addition, as new housing is created to serve a range of incomes, the application of the MIH requirement will guarantee that a percentage of units developed remain permanently affordable and provides assurance that new development will address the needs of residents at lower income levels even in the event that local housing market conditions change.

Ensure that new buildings fit into existing neighborhood contexts

The predominant residential built form in the study area and surrounding blocks is six-to eight story apartment buildings. Ground floor commercial uses are common. The study area and surrounding neighborhoods contain a mix of zoning districts, none of which have a fixed street wall or height limit. The proposed actions will promote a consistent and predictable street wall and fixed height limits. The proposed zoning districts seek to match existing built character where feasible, and mandate through the mapping of contextual zoning districts, the incorporation of Quality Housing standards relating to recreation areas and landscaping within the building.

Increase the opportunities to diversify neighborhood retail and services

Map a full C4-4D commercial district at Jerome Avenue and Burnside Avenue, as well as C2-4 commercial overlays throughout the corridor where residential districts are being mapped. Additionally, create new commercial overlays along River Avenue and Edward L. Grant Highway where none exist today to allow



Source: New York City Department of City Planning, 2016; STV Incorporated, 2016.



Figure 4a

for new, commercial uses.

Create special rules for new building along the elevated rail to provide light and air on the streets and maintain distance between residential units and the train

The #4 elevated train along Jerome Avenue is at the heart of the study area. To facilitate development along and adjacent to the elevated rail, the proposed actions will include special zoning bulk provisions within the Special Jerome Avenue District for setbacks along the elevated rail line and require non-residential ground-floor uses in all commercial districts.

Create special rules for new buildings and street wall continuity and relief on irregular lots

On sites bounded by Edward L. Grant Highway and Jerome Avenue, an irregular street grid pattern has produced lot irregularity that could preclude the development of residential and mixed use buildings. To facilitate development on irregular lots, the proposed actions include special zoning bulk provisions within the Special Jerome Avenue District for street wall continuity and relief, and additional height within limits to make development feasible in the area. Articulation of the street wall, transparency requirements, and special open space provisions will ensure a lively and visually interesting streetscape.

Promoting active ground floor uses and diverse retail to support community needs and provide a consistent streetscape throughout the corridor

The proposed actions includes commercial overlays that will facilitate local retail to serve the shopping and service needs of area residents and workers, allow for a greater range of commercial uses, and as well as provide continuity in the pedestrian realm. ~~In addition, an Enhanced Commercial Districts (ECD) will be mapped along Jerome Avenue, 167th Street, 170th Street, Mt. Eden Avenue, Burnside Avenue, 183rd Street and Edward L. Grant Highway. In the ECD, In specified areas within the Special District (as will be indicated in the Zoning Resolution), all new developments in commercial districts will be required to provide non-residential uses on the ground floor and meet lighting, glazing, and transparency requirements. ~~The ECD-~~These requirements will enhance the existing streetscape, match existing mixed-use buildings in the area, and provide an improved pedestrian experience.~~

Anchor the Jerome corridor and surrounding neighborhoods by permitting more intensive ~~density~~ and a broader range of uses in two nodes

The areas of Burnside and Tremont Avenues are proposed to be designated as a full commercial (C4-4D) district, permitting higher-density residential, community facility, and commercial uses. These areas will be permitted more commercial FAR than other parts of the rezoning area. The proposed zoning will help strengthen an existing active commercial node by permitting greater density and a wider range of uses. The proposed zoning will leverage transit access, surrounding institutions, and proposed infrastructure investments to support regional retail uses such as entertainment uses and office space.

The highest density residential districts are proposed for strategic locations at the southern end of the rezoning area, located where, Edward L. Grant Highway, ~~and~~ Jerome Avenue, ~~as well as Burnside and Cromwell Avenue converge,~~ and Tremont Avenues in the northern portion of the rezoning area at River

Avenue and 165th Street. These are wide streets and intersections where additional density and growth can be accommodated.

Preserve-Maintain zoning for heavy commercial and light industrial uses in targeted areas to support mixed uses and jobs

The study area includes C8-3 and M1-2 zoning districts that have been in place since 1961. These areas include a number of auto-related businesses ranging from auto repair, auto body, auto glass, car audio sales, tire shops, and parking facilities that include both surface lots and structured garages. Many of these businesses have been in existence for decades and during the outreach process community stakeholders identified a goal to preserve areas for these businesses to remain and expand. The proposed actions identify areas for growth and development to facilitate new residential, commercial and community facility uses. Four areas within the study area boundary were designated for no changes to the existing zoning to support the preservation of these unique businesses in the study area. These areas were carefully selected based on the number and types of businesses, locations off major street and unique site conditions that would impede redevelopment. In support of this action the Department of Small Business Services (SBS) is concurrently developing strategies and programs specifically tailored to the unique desires and needs of the businesses in the study area including, compliance assistance, job training and business development. While not part of the proposed actions, these programs are an important component of the neighborhood plan.

The actions described here have been carefully developed to advance the specific goals of the proposal, identified through the Study's planning and engagement framework. The land use actions take strides in unlocking additional capacity for permanently affordable housing, responding to the elevated rail structure, maintaining existing zoning controls where appropriate and desired, shaping the commercial and retail landscape and surrounding public areas, and controlling the heights, bulks and quality of the interior spaces in buildings. However, it is the Plan's overarching strategies, coordinated investments, and custom service delivery programs, among other elements, that all work with the land use actions and zoning changes to fulfill the neighborhood vision identified through the Jerome Avenue Neighborhood Plan.

Establish controls for transient hotels to ensure consistency with the goals and objectives of the rezoning

The proposed hotel special permit is intended to ensure that hotel development does not conflict with the Proposed Actions' goal to create opportunities for requiring permanently affordable housing, and to ensure that the neighborhood would continue to serve diverse housing needs and any hotel use is consistent with such character of the surrounding area.

G. DESCRIPTION OF THE PROPOSED ACTIONS

The Proposed Actions would implement the objectives of the Jerome Avenue Neighborhood Plan by creating opportunities for permanently affordable housing, ensuring that new buildings reflect existing neighborhood context, improving the public realm by encouraging non-residential ground floor uses and a consistent streetscape. To accomplish these goals, DPC is proposing zoning text amendments, zoning map amendments and city map changes (collectively the “Proposed Actions”). The proposed zoning text and map amendments would rezone an approximately 73-block area primarily along Jerome Avenue and its east west commercial corridors in Bronx Community Districts 4 and 5 and 7 (the “Rezoning Area”), and would establish the Special Jerome Avenue District coterminous with the Rezoning Area. The Rezoning Area is generally bounded by E.165th Street to the south and 184th street to the north; and also includes portions of Edward L. Grant Highway, E.170th Street, Mount Eden Avenue, Tremont Avenue, Burnside Avenue and E.183rd Street. The proposed city map changes are located a block outside of the Rezoning Area in the Highbridge neighborhood of the Bronx, Community District 4.

As discussed in detail below, the Proposed Actions consist of:

- Zoning map amendments to rezone portions of existing C4-4, M1-2, R8, C8-3, and R7-1 with R7A, R8A, R9A, R7D, and C4-4D districts and C2-4 commercial overlays.
- Zoning text amendments to:
 - Establish the Special Jerome Avenue District, coterminous with the Rezoning Area. The proposed special district will include regulations that will add controls to the ground floors of buildings within mapped commercial overlays and districts, modify height and bulk regulations on lots fronting the elevated rail line, modify bulk regulations on irregular lots, and establish controls, ~~such as discretionary review provisions, a CPC Special Permit for transient hotels on commercial lots.~~
 - Establish proposed R7A, R7D, R8A, R9A, and C4-4D districts as Mandatory Inclusionary Housing areas, applying the Mandatory Inclusionary Housing program to require a share of new housing to be permanently affordable where significant new housing capacity would be created.
- City Map changes to:
 - Map Block 2520, Lot 19 as parkland. This city-owned parcel is located one block outside of the rezoning area and is bounded by West 170th Street, Nelson Avenue, Shakespeare Avenue, and Corporal Fischer Place in the Highbridge neighborhood of the Bronx, Community District 4.
 - De-map Corporal Fischer Place (street) between Nelson Avenue and Shakespeare Avenue, which is adjacent to the parcel to be mapped as park land as described above (Block 2520, Lot 19), and map it as parkland.

Proposed Zoning Map Changes

Proposed R7A (Existing C8-3, R7-1, and R7-1)

An R7A zoning district is proposed to cover portions of 2 full and 17 partial blocks in two areas:

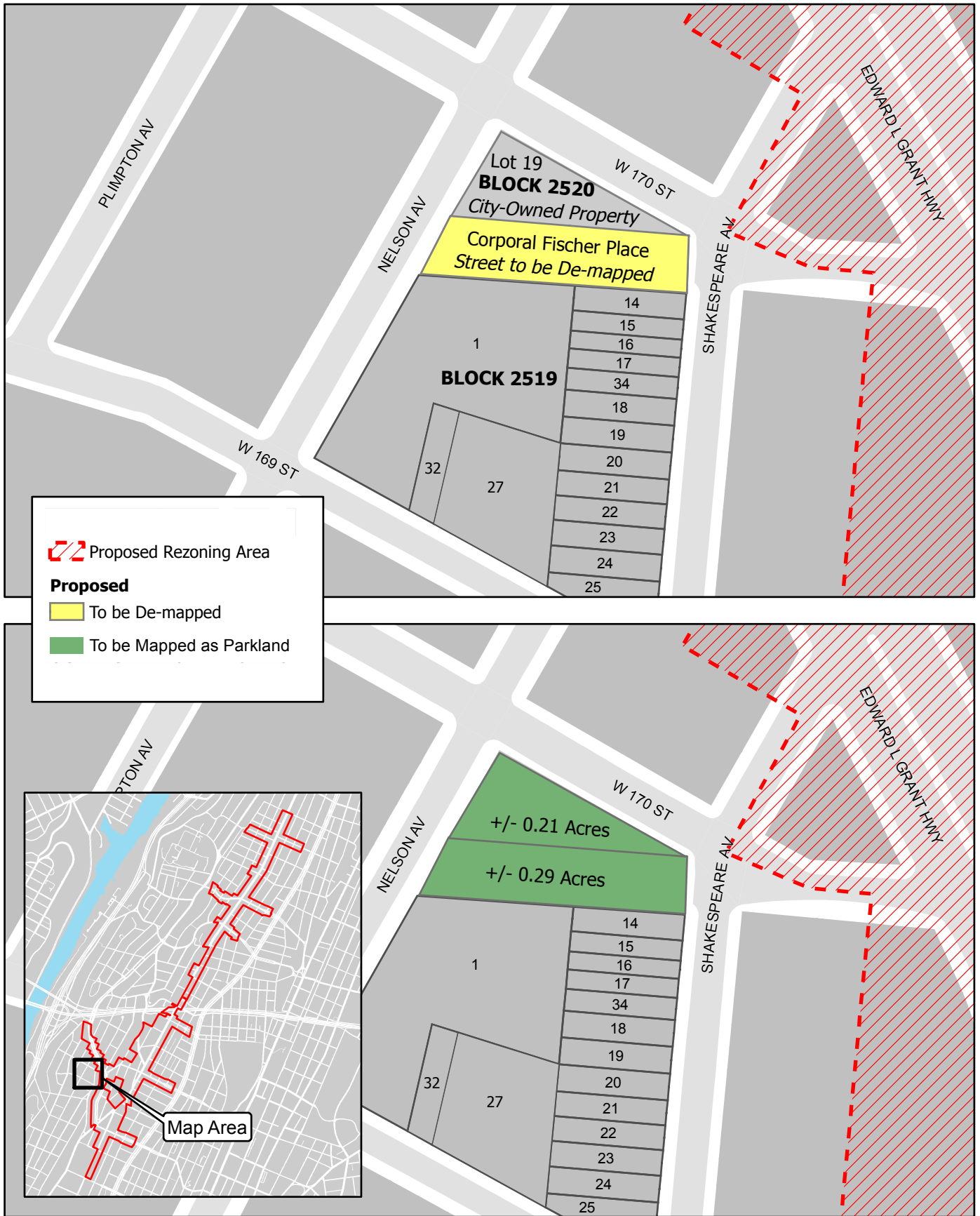
- An area roughly bounded by East 175th Street to the north, East 171st Street to the south
- An area roughly bounded by Townsend Avenue to the east and Inwood and Davidson Avenues to the west

R7A allows medium-density apartment buildings at a maximum FAR of 4.0 for residential uses and 4.6 for residential uses in areas mapped with Inclusionary Housing. R7A districts permit community facility FARs up to 4.0 and 4.6 in areas mapped with Inclusionary Housing. The R7A district allows base heights between 40'-65' and 40'-75' in areas mapped with inclusionary housing. Inclusionary Housing. Above the base height, buildings would be required to set back either 10' or 15' depending on if they have frontage on wide or narrow streets, respectively. After setting back, maximum building heights in the district are set at 95' in ~~inclusionary housing~~ Inclusionary Housing zones, for buildings with qualifying ground floors. Alternate base height, setback, and overall building height rules, described in detail below, ~~will~~ would apply to any lot fronting the elevated rail line along River Avenue and Jerome Avenue. New structures would be required to locate at least 70% of the street wall within eight feet of the street line. Interior or through lots that are not on the narrow end of the block or within 100 feet of a generally allow up to 65% lot coverage and corner lots permit up to 65% lot coverage. Otherwise, up to 100% lot coverage is permitted. R7A districts require a 30' rear yard for the residential portions of any building. ~~R7A districts require a 30' rear yard for the residential portions of any building.~~ Parking is required for 50% of the residential uses at a ratio of .5 spaces per unit. No units except that no parking is required for income or age-restricted units.

Proposed R7D (Existing R7-1)

R7D is proposed for 2 blocks bounded by East 177th Street to the north, East 176th Street to the south, Townsend Avenue to the East and Jerome Avenue to the west.

R7D allows medium-density apartment buildings at a maximum FAR of 5.6 for residential uses in areas mapped with Inclusionary Housing. R7D districts permit community facility FARs up to ~~5.6 in areas mapped with Inclusionary Housing.~~ 4.2. The R7D district allows base heights between 60'-95' for areas mapped with Inclusionary Housing. Above the base height, buildings would be required to set back either 10' or 15' depending on if they front onto wide or narrow streets, respectively. ~~inclusionary housing.~~ Above the base height, buildings would be required to set back either 10' or 15' depending on if they front onto wide or narrow streets, respectively. After setting back, maximum building heights in the district are set at ~~125'~~ 115' in ~~inclusionary housing~~ Inclusionary Housing zones, for buildings with qualifying ground floors. Alternate base height, setback and overall building height rules, described in detail below, ~~will~~ would apply to any lot fronting the elevated rail line along River Avenue and Jerome Avenue. New structures would be required to locate at least 70% of the street wall within eight feet of the street line. Interior lots that are not on the narrow end of the block or within 100 feet of a corner permit up to 65% lot coverage. Otherwise, up to 100% lot coverage is permitted. R7D districts require a 30' rear yard for the residential portions of any building. -Parking is required for residential uses at a ratio of .5 spaces per unit. No parking is required for income or age-restricted units.



Proposed Rezoning Area

Proposed

- To be De-mapped
- To be Mapped as Parkland

Source: New York City Department of City Planning, 2016; STV Incorporated, 2016.

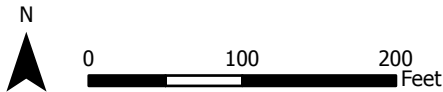
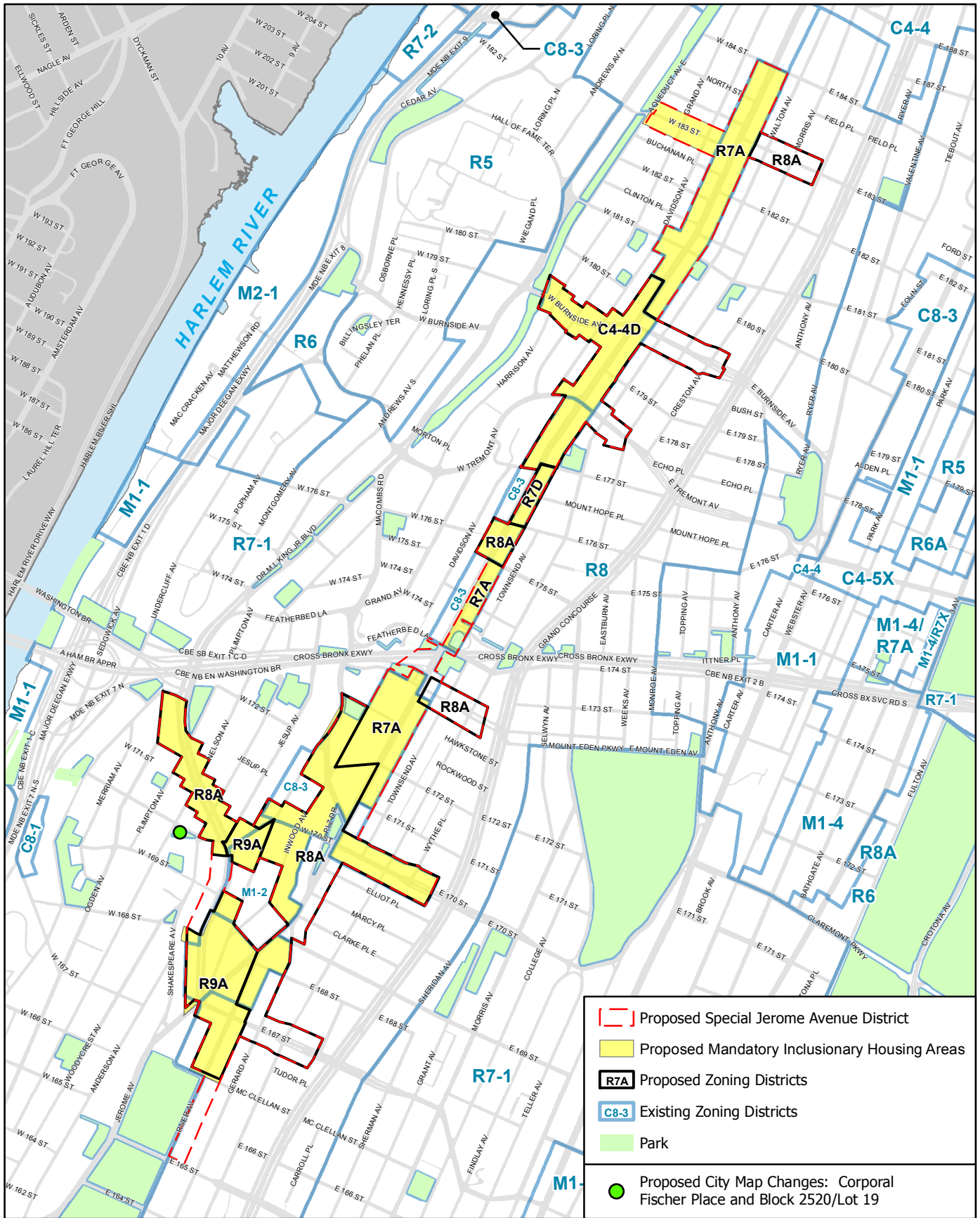


Figure 4b
**PROPOSED CITY MAP CHANGES:
 CORPORAL FISCHER PLACE
 AND BLOCK 2520 / LOT 19**



N
 0 0.25 0.5 Mile
Jerome Avenue Rezoning EIS

Figure 5

PROPOSED MANDATORY INCLUSIONARY HOUSING AREAS

Proposed R8A (Existing M1-2, C8-3, C4-4, R7-1, R8)

A R8A zoning district is proposed along six partial blocks fronting on East Mt. Eden Avenue between Jerome Avenue and the Grand Concourse and 13 partial blocks fronting on Edward L. Grant Highway between West 170th Street and the Cross Bronx Expressway, along 1 full and two partial blocks at 176th street and Jerome Avenue, and along 5 full and 18 partial blocks bounded by Goble Place to the north, East 167th Street to the south, Grand Concourse to the east and Macombs Road to the west.

R8A allows medium-density apartment buildings at a maximum FAR of 6.02 for residential uses and 7.2 for residential uses in areas mapped with Inclusionary Housing. R8A districts permit community facility FARs up to 6.5 and 7.2 in areas mapped with Inclusionary Housing. The R8A district allows base heights between 60'-~~95'~~105' for areas mapped with ~~inclusionary housing~~Inclusionary Housing. Above the base height, buildings would be required to set back either 10' or 15' depending on if they front onto wide or narrow streets, respectively. After setting back, maximum building heights in the district are set at 145' in ~~inclusionary housing~~Inclusionary Housing zones, for buildings with qualifying ground floors. Alternate base height, setback and overall building height rules, described in detail below, ~~will~~would apply to any lot fronting the elevated rail line along River Avenue and Jerome Avenue. New structures would be required to locate at least 70% of the street wall within eight feet of the street line. Interior lots that are not on the narrow end of the block or within 100 feet of a corner permit up to 70% lot coverage. Otherwise, up to 100% lot coverage is permitted. R8A districts require a 30' rear yard for the residential portions of any building. Parking is required for residential uses at a ratio of 0.4 spaces per unit. No parking is required for income or age-restricted units.

Proposed R9A (Existing C8-3, M1-2, R7-1 and R8)

An R9A zoning district is proposed for three full and 6 partial blocks in two areas:

- *An area bounded by West 169th Street to the north, McClellan Street to the south, River Avenue to the east and Edward L. Grant Highway to the west*
- *An area bounded by West 170th Street to the north, West 169th Street to the south, Cromwell Avenue to the east and Jesup Avenue to the west.*

R9A allows high-density apartment buildings at a maximum FAR of 8.5 for residential uses in areas mapped with Inclusionary Housing. R9A districts permit community facility FARs up to 7.5. The R9A district allows base heights between 60'-125' for areas mapped with ~~inclusionary housing~~Inclusionary Housing. Above the base height, buildings would be required to set back either 10' or 15' depending on if they front onto wide or narrow streets, respectively. After setting back, maximum building heights in the district are set at 175' on wide streets and 165' on narrow streets in ~~inclusionary housing~~Inclusionary Housing zones. Alternate base height, setback and overall building height rules, described in detail below, ~~will~~would apply to any lot fronting the elevated rail line along River Avenue and Jerome Avenue. New structures would be required to locate at least 70% of the street wall within eight feet of the street line. Interior lots that are not on the narrow end of the block or within 100 feet of a corner permit up to 70% lot coverage. Otherwise, up to 100% lot coverage is permitted. R9A districts require a 30' rear yard for the residential portions of any building. Parking is required for residential uses at a ratio of 0.4 spaces per unit. No parking

is required for income or age-restricted units. ~~Parking is required for residential uses at a ratio of .4 spaces per unit. No parking is required for income or age-restricted units.~~

Proposed C4-4D (Existing C8-3, R7-1 and R8)

A C4-4D is proposed for 21 partial blocks bounded by East 181st Street to the north, East 177th Street to the south, Creston Avenue to the East, and Aqueduct Avenue East to the west.

C4-4D is an R8A equivalent, and is a mid-density commercial district that permits residential uses up to 7.20 FAR in areas designated as part of the Inclusionary Housing program, commercial uses up to 3.4 FAR, and community facilities up to 6.5 FAR. Residential and mixed use buildings developed within the district are subject to bulk regulations governed by the R8A district. The off-street parking requirement is typically one space per 1,000 square feet of commercial and community facility uses. ~~Parking is required for residential uses at a ratio of 0.4 spaces per unit. No parking is required for income or age-restricted units.~~

Proposed C2-4 Commercial Overlays

C1-4 and C2-4 commercial overlays are mapped along portions of East 167th Street, Edward L. Grant Highway, Jerome Avenue, Mount Eden Avenue, East 176th Street, Burnside and Tremont Avenues and East 183rd Street. C2-4 commercial overlays are proposed to be mapped over portions of the proposed R7A, R7D, R8A, and R9A as detailed below. The affected areas ~~is~~ are as follows:

- 13 blocks generally bound between 184th Street and Burnside Avenue, along the eastern and western frontages of Jerome Avenue;
- ~~Two~~ blocks generally bound between 175th Street and the Cross Bronx Expressway, along the eastern frontage of Jerome Avenue;
- ~~8~~ Eight blocks generally bound between the Cross Bronx Expressway and 170th Street, along the eastern and western frontages of Jerome Avenue;
- ~~12~~ Twelve blocks generally bound between the Grand Concourse and Edward L. Grant ~~highway~~ Highway along the northern and southern frontages of 170th Street;
- ~~1~~ One portion of ~~1~~ one block generally bound to the western frontage of Jerome Avenue, north of West Clarke place;
- ~~6~~ Six blocks generally bound between 170th Street and 167th Street along the eastern and western frontages of Edward L. Grant ~~highway~~ Highway;
- ~~2~~ Two blocks generally bound between 169th Street and 167th Street along the eastern and western frontages of Jerome Avenue; and
- ~~1~~ One block generally bound between 165th Street and McClellan Street along the eastern frontage of Jerome Avenue.

C2-4 commercial overlays allow for local retail uses and commercial development up to 2.0 FAR and allow Use Groups 1-9 and 14, which include uses such as plumbing and electrical shops, small bowling alleys and movie theaters, funeral homes, small repair shops, printers, and caterers. ~~For general commercial uses, one off-street parking space is required for every 1,000 square feet of such use, and up to 40 spaces~~

may be waived.

Proposed Zoning Text Amendments

The Department of City Planning proposes a series of text amendments to facilitate the land use objectives and the Jerome Avenue Neighborhood Plan. The following is a list and description of the proposed text amendments:

Special Jerome Avenue Special-District

A special district known as the Special Jerome Avenue Special-District will be mapped coterminous with the rezoning area. The special district will allow for special bulk modifications to be made for zoning lots fronting the elevated rail. On such lots, a minimum and maximum base height of 25 and 30 feet, respectively, will be established. Above the base height, a minimum set back of 10 feet will be required. On such lots, to provide architectural flexibility and encourage better design, an additional two stories would be permitted up to 20-20 feet in allowable height. Additionally, the special district will permit the waiver of street wall requirement on specifically identified irregular lots.

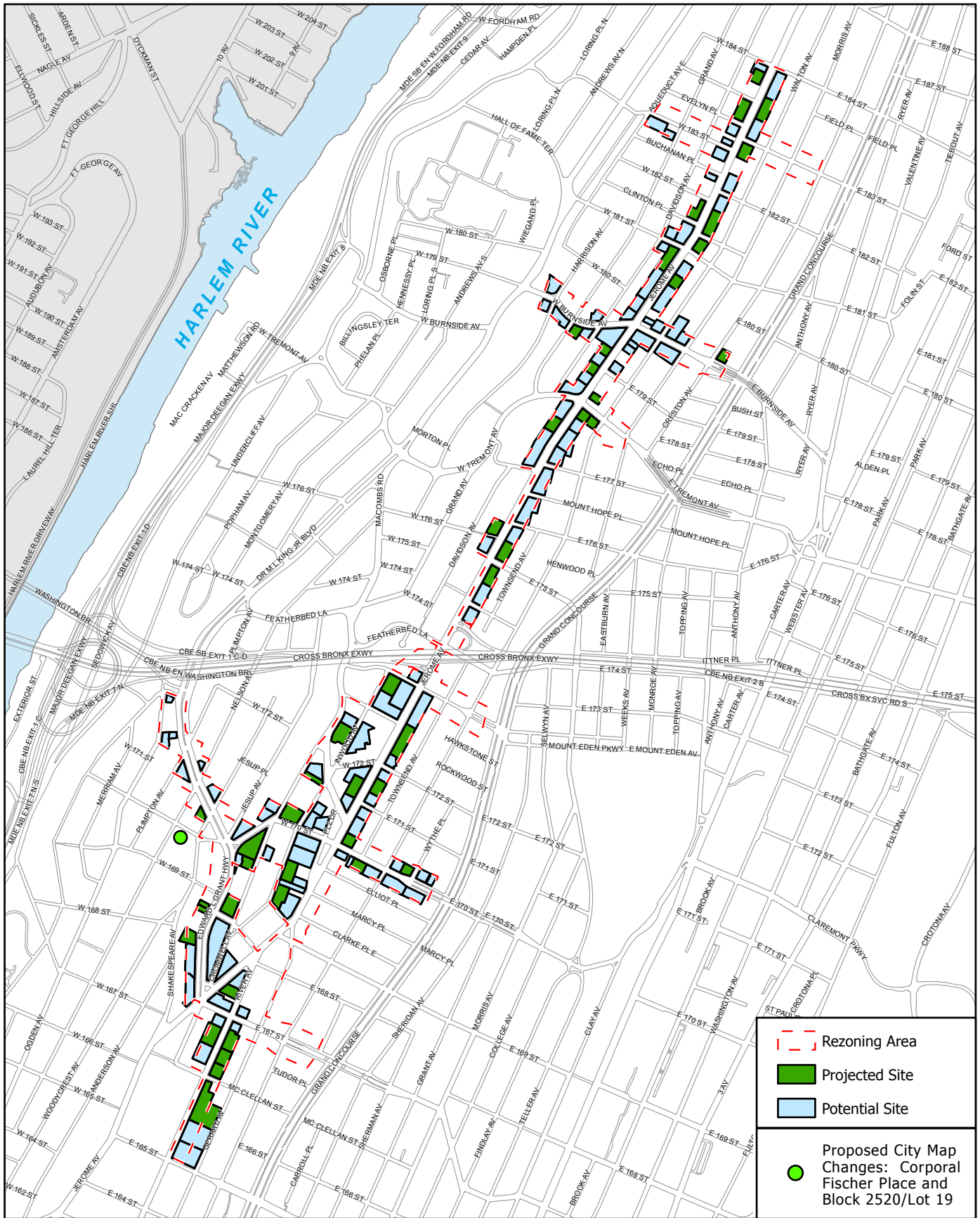
The proposed special district would ~~also modify~~ set forth modified streetwall requirements on specific frontages identified via a text map and increase maximum permitted heights to 225 feet for irregular lots within R9A districts- located adjacent to intersections, with a 105 foot maximum base height in designated areas. In order to encourage visual variety and building articulation, 20% of the façade will be required to recess three feet.

On corner lots, chamfered corners will be allowed in order to facilitate the creation of open space and to permit efficient floorplates on parcels that would otherwise present significant obstacles to development. The text will also set forth transparency and screening requirements and will not permit fences or unenclosed parking on these lots.

These modifications will adjust for irregularities such as acute corner conditions, varied topography, and other site encumbrances. The modifications and waivers associated with the special district will not increase buildable floor area on any lot, rather create flexibility in building design to encourage desirable outcomes in the architectural quality of developments and the associated public realm.

The proposed special district would also impose controls at the ground floor of all commercial overlay and full commercial districts: along Jerome Avenue from East 167th Street to East 183rd Street and the commercial corridors of East 167th Street, East 170th Street, Mount Eden Avenue, Burnside and Tremont Avenues and East 183rd and East 184th Street. The controls would foster a safe and walkable pedestrian experience along these corridors by establishing regulations requiring mandatory active, non-residential uses on the ground floor, minimum levels of transparency, and limiting curb cuts, where appropriate.

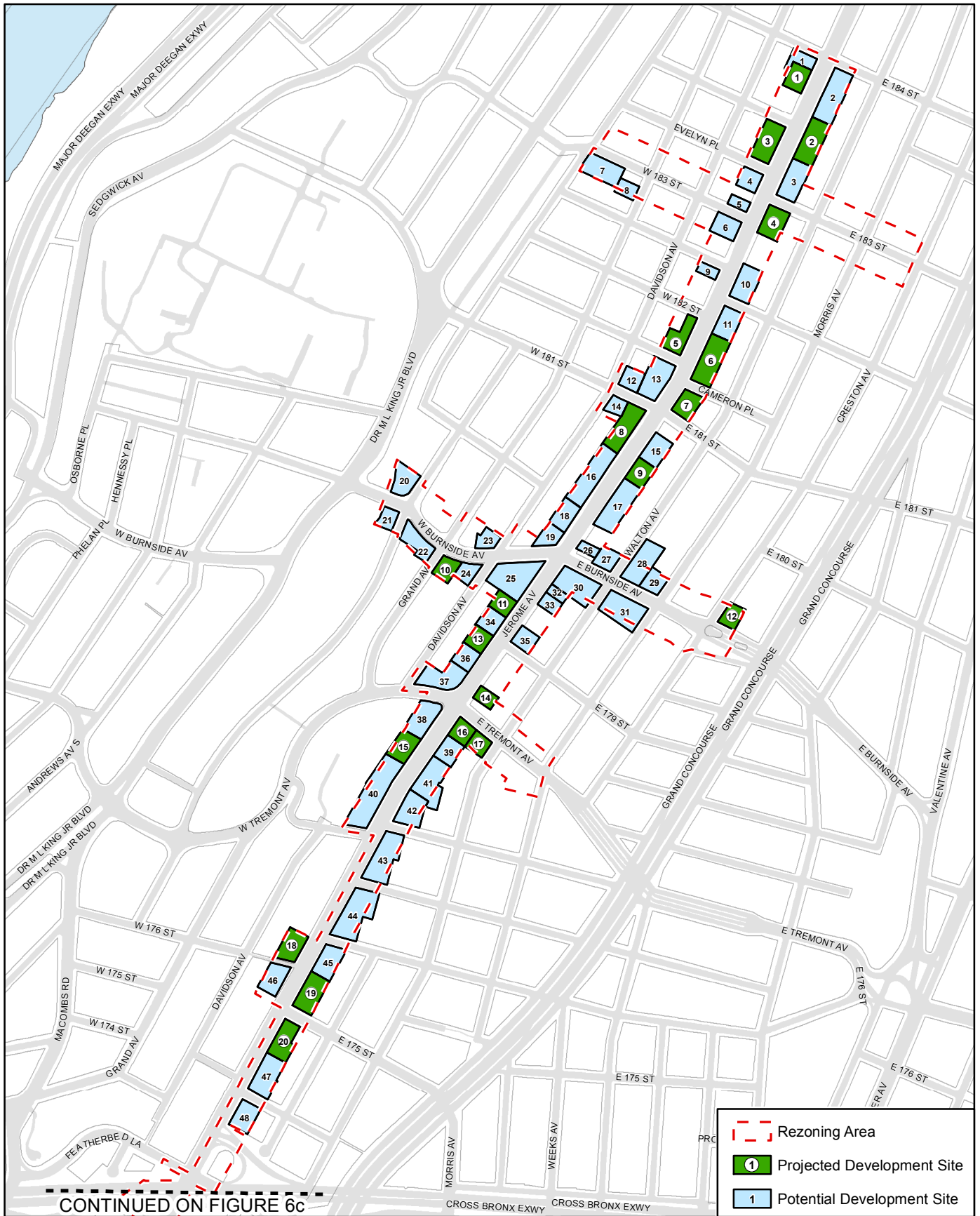
~~Finally, the proposed special district~~ Additional controls would be imposed ~~appropriate controls~~ on



Source: New York City Department of City Planning, 2016; STV Incorporated, 2016.



Figure 6a



Source: New York City Department of City Planning, 2016; STV Incorporated, 2016.

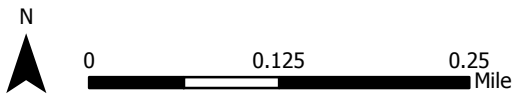
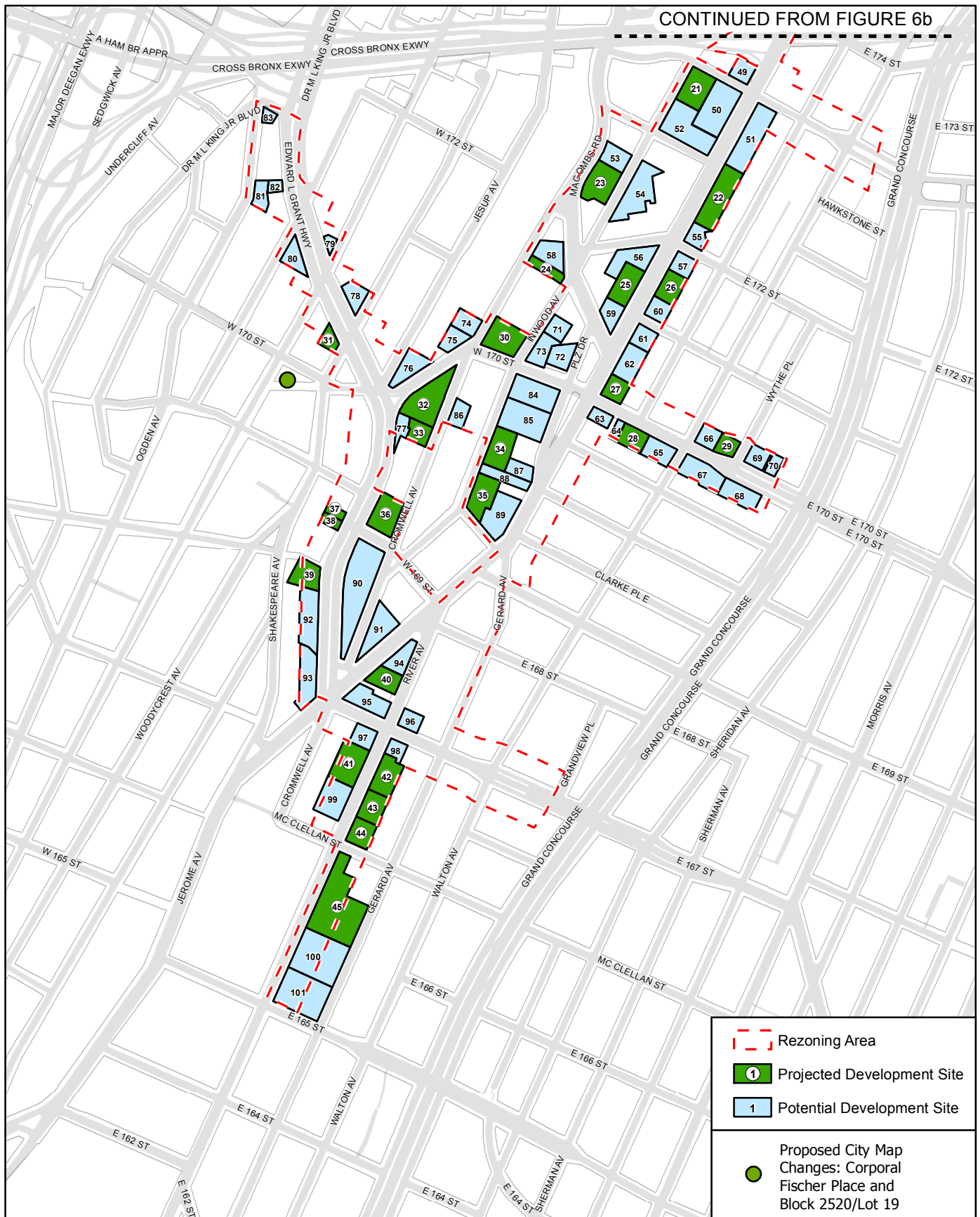






Figure 6b



 Rezoning Area
 Projected Development Site
 Potential Development Site
 Proposed City Map Changes: Corporal Fischer Place and Block 2520/Lot 19

Source: New York City Department of City Planning, 2016; STV Incorporated, 2016.



Figure 6c

RWCDs PROJECTED & POTENTIAL DEVELOPMENT SITES - SOUTH

transient hotels within C2 and C4 districts to ensure consistency with the goals and objectives of the rezoning. Transient hotels will be permitted on zoning lots within C2-4 districts that meet specific locational criteria set forth within ZR Section 32-14; for other zoning lots, transient hotels will require a CPC Special Permit if the residential development goal set forth in ZR Section 141-12 has not been met.

Mandatory Inclusionary Housing

The proposed R7A, R7D, R8A, R9A and C4-4D, zoning districts will be mapped as Mandatory Inclusionary Housing Areas setting mandatory affordable housing requirements pursuant to the Mandatory Inclusionary Housing program.

Amendment to Appendix F adding the proposed R7A, R7D, R8A, R9A, and C4-4D to the list and maps of Mandatory Inclusionary Housing Areas.

Text amendment to permit legally required windows less than 30 feet from the lot line of Corporal Fischer Park.

Proposed City Map Changes

To facilitate the development of Corporal Fischer Park, the Department of City Planning in collaboration with DPR and CDOT proposes the following changes to the City Map:

- Map Block 2520, Lot 19 as parkland. This city-owned parcel is located one block outside of the rezoning area and is bounded by West 170th Street, Nelson Avenue, Shakespeare Avenue, and Corporal Fischer Place in the Highbridge neighborhood of the Bronx, Community District 4.
- De-map Corporal Fischer Place (street) between Nelson Avenue and Shakespeare Avenue, which is adjacent to the parcel to be mapped as park land as described above (Block 2520, Lot 19), and map it as parkland.

To facilitate the development of Corporal Fischer Park, the aforementioned changes are proposed. In addition, the City is exploring options related to the potential alienation and release from Department of Parks and Recreation control of lots 32 and 27 on the same block to facilitate future development to be determined subsequent to this action, and consistent with community goals and desires.

H. ANALYSIS FRAMEWORK

Reasonable Worst-Case Development Scenario (RWCDs)

In order to assess the possible impacts of the components of the proposed action, a reasonable worst-case development scenario (RWCDs) was established for both the current (Future No-Action) and proposed zoning (Future With-Action) conditions for the build year 2026. The incremental difference between the Future No-Action and Future With-Action conditions will serve as the basis for the impact analyses of the Environmental Impact Statement (EIS). A ten-year period typically represents the amount of time developers would act on the proposed action for an area-wide rezoning not associated with a specific development.

To determine the With-Action and No-Action conditions, standard methodologies have been used following the *CEQR Technical Manual* guidelines employing reasonable assumptions. These methodologies have been used to identify the amount and location of future development

In projecting the amount and location of new development, several factors have been considered in identifying likely development sites; including known development proposals, past development trends, and the development site criteria described below. Generally, for area-wide rezonings which create a broad range of development opportunities, new development can be expected to occur on selected, rather than all, sites within the rezoning area. The first step in establishing the development scenario was to identify those sites where new development could be reasonably expected to occur.

Development Site Criteria

Development sites were identified based on the following criteria:

- Lots utilizing less than half of the permitted Floor Area Ratio (FAR) under the proposed zoning
- Lots with a total size greater than or equal to 5,000 square feet (including potential assemblages totaling 5,000 square feet or more if assemblage seems probable⁴); For the purposes of this analysis, assemblages are defined as a combination of adjacent lots which satisfy one of the following conditions: (1) the lots share common ownership and, when combined, meet the Qualifying site criteria; and/or (2) at least one of the lots, or combination of lots, meets the Qualifying site criteria, and ownership of the assemblage is shared by no more than two distinct owners.
- Underutilized lots – (defined as vacant lots, surface parking lots, garages and single story structures built to less than or equal to half of the proposed zoning); and
- Lots located in areas where changes in use would be permitted.

Certain lots that meet these criteria were excluded from the scenario based on the following conditions because they are very unlikely to be redeveloped:

- Lots where construction activity is actively occurring or has recently been completed;
- Schools (public and private), municipal libraries, government offices, hospitals, medical centers and houses of worship (stand-alone). These facilities may meet the development site criteria, because they are built to less than half of the permitted floor area ratio under current zoning and are on lots greater than 5,000 square feet. However, these facilities have not been redeveloped or expanded despite the ability to do so, and it is extremely unlikely that the incremental FAR permitted under the proposed zoning would induce development or expansion of these structures. Additionally, for government-owned properties, development and/or sale of these lots may require discretionary actions from the pertinent government agency;

⁴ ~~Assemblages are defined as a combination of adjacent lots, which satisfy one of the following conditions:~~

~~(1) lots share common ownership and, when combined, meet the Qualifying site criteria;~~

~~(2) At least one of the lots, or combination of lots, meets the Qualifying site criteria, and ownership of the assemblage is shared by no more than two distinct owners.~~

- Lots containing multi-family (6 or more dwelling unit) residential buildings; due to required relocation of tenants in rent-stabilized units;
- Certain large commercial or community facility uses;
- Lots utilized for public transportation and/or public utilities.

Projected and Potential Development Sites

To produce a reasonable, conservative estimate of future growth, the development sites have been divided into two categories: projected development sites and potential development sites. The projected development sites are considered more likely to be developed within the ten-year analysis period for the proposed actions (i.e. by the analysis year 2026) while potential sites are considered less likely to be developed over the approximately ten-year analysis period. Potential development sites were identified based on the following criteria:

- Lots upon which the majority of floor area is occupied by active businesses (3 or more);
- Lots with slightly irregular shapes, topographies, or encumbrances that would make them difficult to redevelop;
- Lots that have recently undergone significant investment;
- Lots where they have been recent significant improvements or investments;
- Structured parking garages;
- Lots that contain businesses that provide valuable and/or unique services to the community; and
- Lots that would produce less than 60 units of housing.

Based on the above criteria, a total of 143 development sites (45 projected and 98 potential) have been identified in the rezoning area. Figure 5a, "Projected and Potential Development Sites - Overview," shows these projected and potential development sites, and the detailed RWCDs tables provided in Appendix 2 to this document identify the uses expected to occur on each of these sites under Future No-Action and Future With-Action conditions. Table 1, below, provides a summary of the RWCDs for each analysis scenario.

The EIS will assess both density-related and site-specific potential impacts from development on all projected development site. Density-related impacts are dependent on the amount and type of development projected on a site and the resulting impacts on traffic, air quality, community facilities, and open space.

Site-specific impacts relate to individual site conditions and are not dependent on the density of projected development. Site-specific impacts include potential noise impacts from development, the effects on historic resources, and the possible presence of hazardous materials. Development is not anticipated on the potential development sites in the foreseeable future. Therefore, these sites have not been included in the density-related impact assessments. However, review of site-specific impacts for these sites will be conducted in order to ensure a conservative analysis.

Development Scenario Parameters

Dwelling Unit Factor

The number of projected dwelling units in apartment buildings is determined by dividing the total amount of residential floor area by 1,000 and rounding to the nearest whole number.

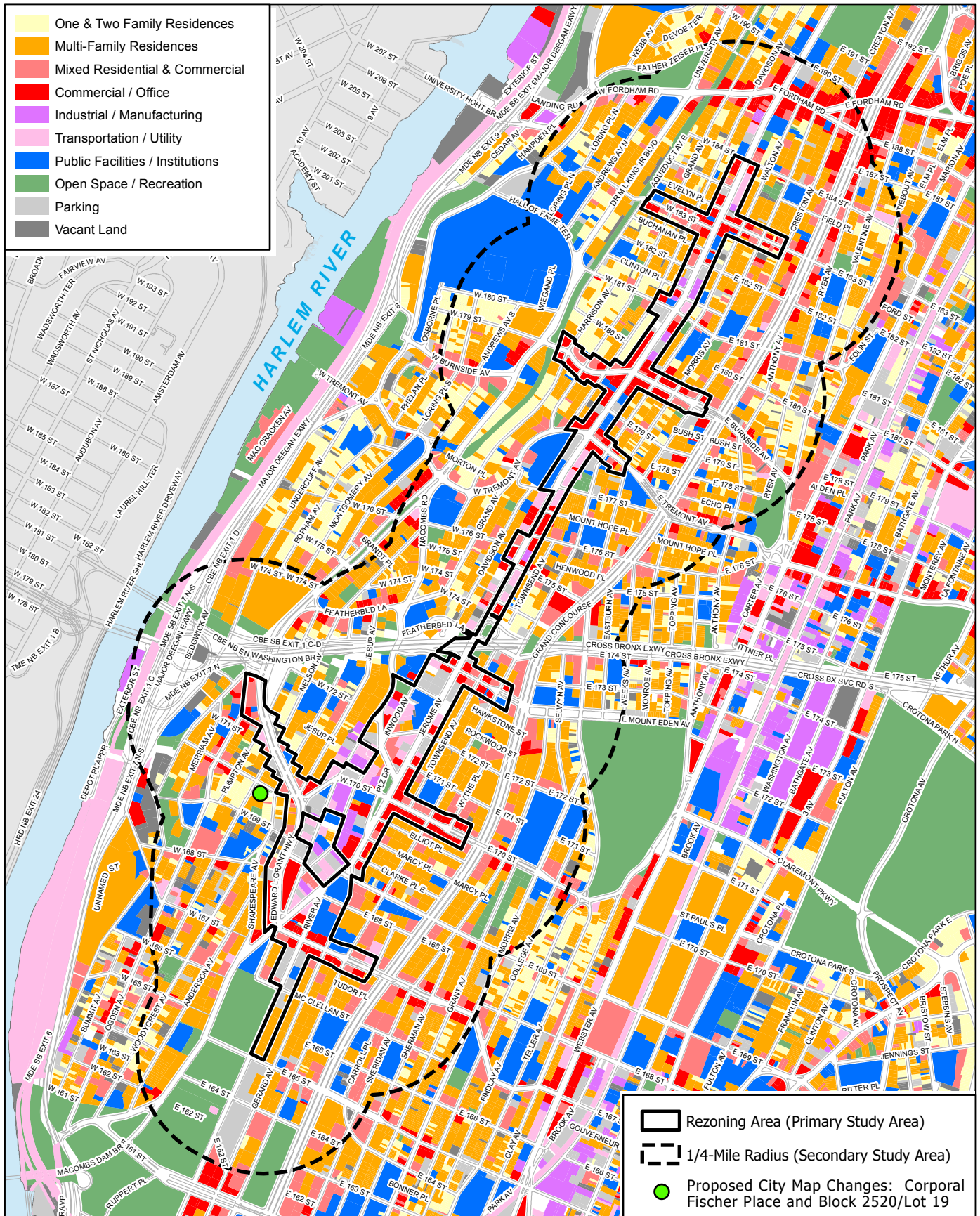
The Future without the Proposed Actions (No-Action Condition)

In the future without the Proposed Actions (No-Action), the identified projected development sites are assumed to either remain unchanged from existing conditions, or become occupied by uses that are as-of-right under existing zoning and reflect current trends if they are vacant, occupied by vacant buildings, or occupied by low intensity uses that are deemed likely to support more active uses. Table 1 shows the No-Action conditions for the projected development sites.

As shown in Table 1 below, it is anticipated that, in the future without the Proposed Actions, there would be a total of approximately 1,558,083 sf of built floor area on the 45 projected development sites. Under the RWCDs, the total No-Action development would comprise approximately 780 residential units with no guarantees for affordability, 238,384 sf of retail, restaurant and grocery store uses, 145,797 sf of industrial and automotive uses, 82,919 sf of community facility uses, and 945 accessory parking spaces. The No- Action estimated population would include approximately 2,268 residents and 1,154 workers on these projected development sites.

The Future with the Proposed Actions (With-Action Condition)

The Proposed Actions would allow for the development of new uses and higher densities at the projected and potential development sites. As shown in Table 1, under the RWCDs, the total development expected to occur on the 45 projected development sites under the With-Action condition would consist of approximately 4,885,424 sf of floor area, including 4,162,049 sf of residential floor area (approximately 4,030 DU), a substantial proportion of which are expected to be affordable, 458,625 sf of retail restaurant and grocery store uses, 0 sf of industrial and automotive uses, and 155,192 sf of community facility uses, as well as 993 accessory parking spaces. The With- Action estimated population would include approximately 11,788 residents and 2,170 workers on these projected development sites. The projected incremental (net) change between the No-Action and With-Action conditions that would result from the Proposed Actions would be an increase of ~~3,267,287~~208,424 sf of residential floor area (~~3,250~~228 DU), ~~285,694~~270,985 sf of retail, restaurant and grocery store space, 72,273 sf of community facility space, and ~~48~~217 accessory parking spaces, and a net decrease 145,797 sf of industrial and automotive uses on the projected development sites.



Source: New York City Department of City Planning, MapPLUTO, 2015 March-June; STV Incorporated, 2016.



Figure 7

TABLE 1
2026 RWCDs No-Action and With-Action Land Uses

Land Use	No-Action Conditions	With-Action Condition	No-Action to With-Action Increment
Residential			
Total Residential	894,761 sf (780 DU)	4,162,049,103,185 sf (4,030,008 DU)	+3,267,287,208,424 sf (3,250,228 DU)
Commercial			
Local Retail	207,719 sf	458,625,443,916 sf	250,907,236,197sf
FRESH Supermarket	28,405 sf	51,562 sf	23,157 sf
Restaurant	2,260 sf	13,891 sf	11,630 ¹ sf
Auto-Related	98,002 sf	0 sf	-98,002 sf
Office	4,818 sf	44,105 sf	39,287 sf
Warehouse	168,650 sf	0 sf	-168,650 sf
Garage	22,154 sf	0 sf	-22,154 sf
Other Commercial	600 sf	0 sf	-600 sf
Total Commercial	532,608 sf	568,183,553,474 sf	35,575,20,866 sf
Other Uses			
Industrial	47,795 sf	0 sf	-47,795
Community Facility	82,919 sf ¹	155,192 sf ²	72,273 sf
Total Floor Area	1,558,083 sf	4,885,424 sf	3,327,341,353,768 sf
Parking			
Parking Spaces	945	9931,162	48217
Population^{3,4}			
Residents	2,268	11,788,727	9,520,459
Workers	1,154	2,170,28	1,016,974

Notes:

1 Includes 36,120 sf of house of worship uses, 6,000 sf of medical office uses, 2,016 sf of day care center uses, 15,800 sf of Pre-K School uses and 22,983 sf of other community facility uses.

2 Includes 53,896 sf of house of worship uses, 8,500 sf of medical office uses, 15,800 sf of Pre-K school uses, 23,099 of day care center uses and 53,896 sf of community center uses.

3 Assumes 2.87 persons per DU for residential units in Bronx Community District 7, 3.06 persons per DU for residential units in Bronx Community District 5 and 2.92 persons per DU for residential units in Bronx Community District 4.

4 Estimate of workers based on standard rates used in prior EIS documents, including the East Midtown Rezoning FEIS, Atlantic Yards FEIS, Western Rail Yards FEIS, Brownsville Ascend Charter School EA, Coliseum Redevelopment FSEIS, 125th Street Corridor Rezoning FEIS, West 57th Street Rezoning FEIS, and others. Employee rates used are as follows: one employee per 250 sf of office, three employees per 1,000 sf of retail/supermarket/restaurant uses, one employee per 25 DU, one employee per 2.67 hotel rooms (and 400 sf per hotel room), one employee per 1,000 sf of auto-related and industrial uses, one employee per 15,000 sf of warehouse uses, one employee per 11.4 students in school uses, three employees per 1,000 sf of all other community facility uses, and one employee per 50 parking spaces.

Based on 2010 Census data, the average household size for residential units in Bronx Community District 4 is 2.92, the average household size for residential units in Bronx Community District 5 is 3.06, and the average household size for residential units in Bronx Community District 7 is 2.87. Based on these ratios and standard ratios for estimating employment for commercial, community facility and industrial uses, Table 1 also provides an estimate of the number of residents and workers on the 45 projected development sites in the No-Action and With-Action conditions. As indicated in the table, under the

RWCDS, the Proposed Actions would result in a net increment of 9,520 residents and 1,016 workers.

A total of 101 sites were considered less likely to be developed within the foreseeable future and were thus considered potential development sites (see Appendix 2). As noted earlier, the potential sites are deemed less likely to be developed because they did not closely meet the criteria listed above. However, as discussed above, the analysis recognized that a number of potential development sites could be developed under the Proposed Actions in lieu of one or more of the projected development sites in accommodating the development anticipated in the RWCDS. The potential development sites are therefore also analyzed in the EIS for site-specific effects.

As such, the EIS will analyze the projected development sites for all technical areas of concern and also evaluate the effects of the potential developments for site-specific effects such as archaeology, shadows, hazardous materials, stationary air quality, and noise.

I. PROPOSED SCOPE OF WORK FOR THE EIS

Because the Proposed Actions would affect various areas of environmental concern and were found to have the potential for significant adverse impacts in a number of impact categories, pursuant to the EAS and Positive Declaration, an EIS will be prepared for the Proposed Actions that will analyze all technical areas of concern. The EIS will be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA) (Article 8 of the New York State Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617, New York City Executive Order No. 91 of 1977, as amended, and the Rules and Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York.

The EIS will include:

- A description of the Proposed Actions and their environmental setting;
- A statement of the environmental impacts of the Proposed Actions, including short- and long-term effects and typical associated environmental effects;
- An identification of any adverse environmental effects that cannot be avoided if the Proposed Actions are implemented;
- A discussion of reasonable alternatives to the Proposed Actions;
- An identification of irreversible and irretrievable commitments of resources that would be involved in the Proposed Actions, should they be implemented; and
- A description of mitigation proposed to eliminate or minimize any significant adverse environmental impacts.

As noted above, the EIS will analyze the projected development sites for all technical areas of concern and also evaluate the effects of the potential development sites for site-specific effects such as archaeology, shadows, hazardous materials, air quality, and noise. The analyses in the EIS will examine the RWCDS with the greater potential environmental impact for each impact area. The specific technical areas to be included in the EIS, as well as their respective tasks and methodologies, are described below.

TASK 1. PROJECT DESCRIPTION

The first chapter of the EIS introduces the reader to the Proposed Actions and sets the context in which to assess impacts. This chapter contains a description of the Proposed Actions: their location; the background and/or history of the project; a statement of the purpose and need; key planning considerations that have shaped the current proposal; a detailed description of the Proposed Actions;

and discussion of the approvals required, procedures to be followed, and the role of the EIS in the process. This chapter is the key to understanding the Proposed Actions and their impact and gives the public and decision makers a base from which to evaluate the Proposed Actions.

In addition, the project description chapter will present the planning background and rationale for the actions being proposed and summarize the RWCDs for analysis in the EIS. The section on approval procedure will explain the ULURP and changes to the City Map, zoning text amendment, and zoning map amendment processes, their timing, and hearings before the Community Boards, the Borough President's Office, the CPC, and the New York City Council. The role of the EIS as a full disclosure document to aid in decision-making will be identified and its relationship to the discretionary approvals and the public hearings described.

TASK 2. LAND USE, ZONING, AND PUBLIC POLICY

A land use analysis characterizes the uses and development trends in the area that may be affected by a proposed action, and determines whether a proposed action is either compatible with those conditions or whether it may affect them. Similarly, the analysis considers the action's compliance with, and effect on, the area's zoning and other applicable public policies. This chapter will analyze the potential impacts of the Proposed Actions on land use, zoning, and public policy. The land use, zoning, and public policy analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

The primary land use study area will consist of the rezoning area, where the potential effects of the Proposed Actions will be directly experienced (reflecting the proposed rezoning and resultant RWCDs). The secondary land use study area would include the neighboring areas within a ¼-mile boundary from the rezoning area, as shown on Figure 6, which could experience indirect impacts. Subtasks will include the following:

- Provide a brief development history of the primary (i.e., rezoning area) and secondary study areas.
- Provide a description of land use, zoning, and public policy in the study areas discussed above (a more detailed analysis will be conducted for the rezoning area). This task will be closely coordinated with Task 3, "Socioeconomic Conditions," which will provide a qualitative analysis of the project's effect on businesses and employment in the rezoning area. Recent trends in the rezoning area will be noted. Other public policies that apply to the study areas will also be described, including: the FRESH Program, Housing New York, Vision Zero, and OneNYC policies. The directly affected area is not within the boundaries of the City's Coastal Zone. Therefore, an

assessment of the Proposed Actions' consistency with the City's Waterfront Revitalization Program is not required.

- Based on field surveys and prior studies, identify, describe, and graphically portray predominant land use patterns for the balance of the study areas. Describe recent land use trends in the study areas and identify major factors influencing land use trends.
- Describe and map existing zoning and recent zoning actions in the study areas.
- Prepare a list of future development projects in the study areas that are expected to be constructed by the 2026 analysis year and may influence future land use trends. Also, identify pending zoning actions or other public policy actions that could affect land use patterns and trends in the study areas. Based on these planned projects and initiatives, assess future land use and zoning conditions without the Proposed Actions (No-Action condition).
- Describe proposed zoning changes, and the potential land use changes based on the Proposed Actions' RWCDs (With-Action condition).
- Discuss the Proposed Actions' potential effects related to issues of compatibility with surrounding land use, the consistency with zoning and other public policies, and the effect of the Proposed Actions on ongoing development trends and conditions in the study areas.
- If necessary, mitigation measures to avoid or reduce potential significant adverse land use, zoning, and/or public policy impacts will be identified.

TASK 3. SOCIOECONOMIC CONDITIONS

The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area. This chapter will assess the Proposed Actions' potential effects on the socioeconomic character of the study area, which is expected to conform to the ¼-mile land use study area described in Task 2. The socioeconomic conditions analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

The socioeconomic study area boundaries are expected to be similar to those of the land use study area, and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. A socioeconomic assessment seeks to assess the potential to change socioeconomic character relative to the study area population. The Proposed Actions are expected to generate a net increase of 3,250 residential units. For projects or actions that result in an increase in population, the scale of the relative change is typically represented as a percent increase in population (i.e., a project that would result in a relatively large increase in population may be expected to affect a larger study area). Therefore, the socioeconomic study area would be expanded to a 0.5 mile radius, if the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a quarter-mile (0.25 mile) study area.

As the Proposed Actions would affect a two-mile stretch of Jerome Avenue in portions of six communities, it may be appropriate to create subareas for analysis if the actions could affect different portions of the study area in different ways. For example, if an action concentrates development opportunities in one portion of the study area, and would result in a higher increase in population in that portion, it may be appropriate to analyze the subarea most likely to be affected by the concentrated development. Distinct sub-areas will be determined based on recognizable neighborhoods or communities in an effort to disclose whether the Proposed Actions may have differing effects on distinct populations that would otherwise be masked or overlooked within the larger study area.

The five principal issues of concern with respect to socioeconomic conditions are whether a proposed action would result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business and institutional displacement; (3) indirect residential displacement; (4) indirect business and institutional displacement; and (5) adverse effects on specific industries. As detailed below, the Proposed Actions warrant an assessment of socioeconomic conditions with respect to all but one of these principal issues of concern—direct residential displacement. Direct displacement of fewer than 500 residents would not typically be expected to alter the socioeconomic characteristics of a neighborhood. The Proposed Actions would not exceed the threshold of 500 displaced residents, and therefore, are not expected to result in significant adverse impacts due to direct residential displacement. The EIS will disclose the number of residential units and estimated number of residents to be directly displaced by the Proposed Actions, and will determine the amount of displacement relative to study area population.

The assessment of the four remaining areas of concern will begin with a preliminary assessment to determine whether a detailed analysis is necessary. Detailed analyses will be conducted for those areas in which the preliminary assessment cannot definitively rule out the potential for significant adverse impacts. The detailed assessments will be framed in the context of existing conditions and evaluations of the Future No-Action and With-Action conditions in 2026, including any population and employment changes anticipated to take place by the analysis year of the Proposed Actions.

Direct Business Displacement

For direct business displacement, the type and extent of businesses and workers to be directly displaced by the RWCDs associated with the Proposed Actions will be disclosed. If a project would directly displace more than 100 employees, an assessment of direct business displacement is appropriate. The Proposed Actions have the potential to exceed the threshold of 100 displaced employees, and therefore, a preliminary assessment will be provided in the EIS.

The analysis of direct business and institutional displacement will estimate the number of employees and the number and types of businesses that would be displaced by the Proposed Actions, and characterize the economic profile of the study area using current employment and business data from the New York State Department of Labor or U.S. Census Bureau. This information will be used in determining the potential for significant adverse impacts: (1) whether the businesses to be displaced provide products or services essential to the local economy that would no longer be available in its “trade area” to local residents or businesses due to the difficulty of either relocating the businesses or establishing new, comparable businesses; and (2) whether a category of businesses is the subject of other regulations or publicly adopted plans to preserve, enhance, or otherwise protect it.

Indirect Residential Displacement

Indirect residential displacement is the involuntary displacement of residents that results from a change in socioeconomic conditions created by a proposed action. Indirect residential displacement could occur if a proposed project either introduces a trend or accelerates a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. To assess this potential impact, the analysis will address a series of threshold questions in terms of whether the project substantially alters the demographic character of an area through population change or introduction of more costly housing.

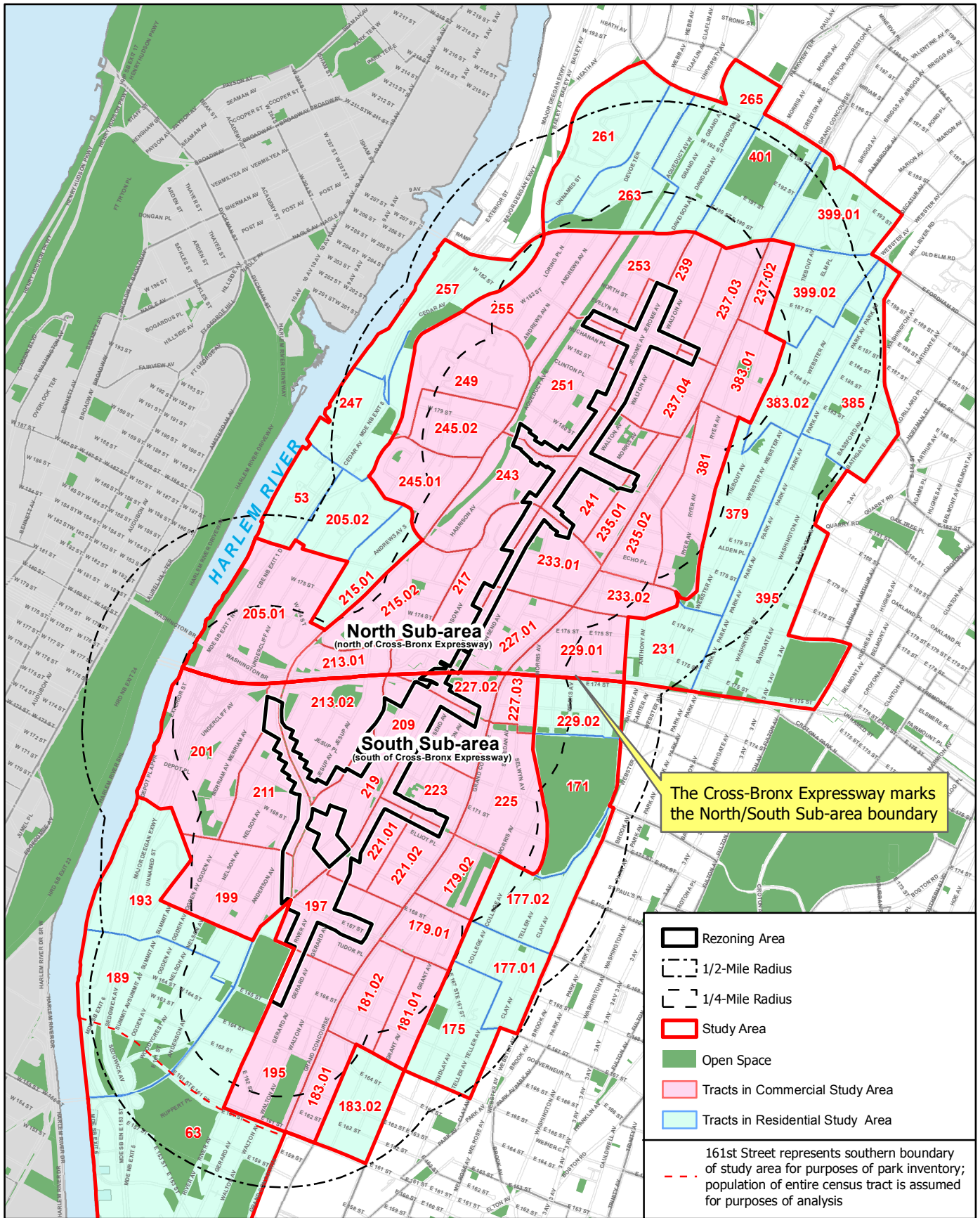
The indirect residential displacement analysis will use the most recent available U.S. Census data, New York City Department of Finance's Real Property Assessment Data (RPAD) database, as well as current real estate market data, to present demographic and residential market trends and conditions for the study area. The presentation of study area characteristics will include population estimates, housing tenure and vacancy status, median value and rent, estimates of the number of housing units not subject to rent protection, and median household income. The preliminary assessment will carry out the following step-by-step evaluation:

- Step 1: Determine if the Proposed Actions would add substantial new population with different income as compared with the income of the study area population. If the expected average incomes of the new population would be similar to the average incomes of the study area populations, no further analysis is necessary. If the expected average incomes of the new population would exceed the average incomes of the study area populations, then Step 2 of the analysis will be conducted.
- Step 2: Determine if the Proposed Actions' population is large enough to affect real estate market conditions in the study area. If the population increase may potentially affect real estate market conditions, then Step 3 will be conducted.
- Step 3: Determine whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends and whether the study area potentially contains a population at risk of indirect displacement resulting from rent increases due to changes in the real estate market caused by the new population.

A detailed analysis, if warranted, would utilize more in-depth demographic analysis and field surveys to characterize existing conditions of residents and housing, identify populations at risk of displacement, assess current and future socioeconomic trends that may affect these populations, and examine the effects of the Proposed Actions on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk.

Indirect Business Displacement

The indirect business displacement analysis is to determine whether the Proposed Actions may introduce trends that make it difficult for those businesses that provide products or services essential to the local economy, or those subject to regulations or publicly adopted plans to preserve, enhance, or otherwise protect them, to remain in the area. The purpose of the preliminary assessment is to determine



Source: New York City Department of City Planning, 2016; STV Incorporated, 2016.

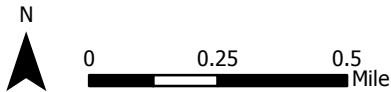


Figure 8

whether a proposed action has potential to introduce such a trend. The Proposed Actions would not introduce more than 200,000 sf of new commercial uses to the area; however, it could displace more than 100 employees. Therefore, an assessment of potential indirect business displacement will be performed.

Adverse Effects on Specific Industries

The analyses of direct business displacement will provide sufficient information to determine whether the Proposed Actions could have any adverse effects on a specific industry, compared with the Future without the Proposed Action. The analysis will determine:

- Whether the Proposed Actions would significantly affect business conditions in any industry or category of businesses within or outside the study areas.
- Whether the Proposed Actions would substantially reduce employment or impair viability in a specific industry or category of businesses.

TASK 4. COMMUNITY FACILITIES AND SERVICES

The demand for community facilities and services is directly related to the type and size of the new population generated by the development resulting from the proposed action. The RWCDs associated with the Proposed Actions would add 3,250 new residential units to the area. This level of development would trigger a detailed analysis of elementary, intermediate, and high schools, libraries, and child care centers, as presented in the EAS document. While the RWCDs would not trigger detailed analyses of potential impacts on police/fire stations and health care services, for informational purposes, a description of existing police, fire, and health care facilities serving the rezoning area will be provided in the EIS. The community facilities and services analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

Public Schools

- The primary study area for the analysis of elementary and intermediate schools should be the school districts' "sub-district" in which the project is located. As the rezoning area encompasses parts of Community School District (CSD) 9, Sub-districts 1, 2, and 3, and CSD 10, Sub-district 4; the elementary and intermediate school analyses will be conducted separately for each sub-district. The Proposed Actions also trigger an analysis of high schools, which are assessed on a borough-wide basis.
- Public elementary and intermediate schools serving CSD 9, Sub-districts 1, 2, and 3, and CSD 10, Sub-district 4 will be identified and located. Existing capacity, enrollment, and utilization data for all public elementary and intermediate schools within the affected sub-districts will be provided for the current (or most recent) school year, noting any specific shortages of school capacity. Similar data will be provided for Bronx high schools. Utilization will be presented using the "Target Calculation Method," which is used by the New York City Department of Education (DOE)

for capital planning purposes.

- Conditions that would exist in the No-Action condition for both the sub-districts (for elementary and intermediate school analyses) and the borough (for the high school analysis) will be identified, taking into consideration projected changes in future enrollments, including those associated with other developments in the affected sub-districts, using the SCA's *Projected New Housing Starts*. The Bronx school districts will be aggregated into a borough total, which will be used for the No-Action borough high school analysis. Plans to alter school capacity, either through administrative actions on the part of the DOE or as a result of the construction of new school space prior to the 2026 analysis year, will also be identified and incorporated into the analyses. Planned new capacity projects from the DOE's *2015-2019 Five Year Capital Plan* will not be included in the quantitative analysis unless the projects have commenced site preparation and/or construction. They may, however, be included in a qualitative discussion. The capacity of transportable classrooms, mini-schools, and annexes will not be included in the future conditions analysis.
- Future conditions with the Proposed Actions will be analyzed, adding students likely to be generated under the RWCDs to the projections for the future No-Action condition. Impacts will be assessed based on the difference between the future With-Action projections and the future No-Action projections (at the sub-district level for elementary and intermediate schools and at the borough level for high schools) for enrollment, capacity, and utilization in 2026.
- A determination of whether the Proposed Actions would result in significant adverse impacts to elementary, intermediate, and/or high schools will be made. A significant adverse impact may result, warranting consideration of mitigation, if the Proposed Actions would result in: (1) a collective utilization rate of the elementary and/or intermediate schools in the sub-district study area that is equal to or greater than 100 percent in the With-Action condition (a determination of impact significance for high schools is conducted at the borough level); and (2) an increase of five percent or more in the collective utilization rate between the No-Action and With-Action conditions. If impacts are identified, mitigation will be developed in consultation with the New York City School Construction Authority (SCA) and DOE. The number of school seats needed to mitigate any identified impacts, as well as the timing when impacts would occur will be provided.

Libraries

- The local public library branch(es) serving the area within approximately $\frac{3}{4}$ -mile of the rezoning area, which is the distance that one might be expected to travel for such services, will be identified and presented on a map.
- Existing libraries within the study area and their respective information services and user populations will be described. Information regarding services provided by branch(es) within the study area will include holdings and other relevant existing conditions. Details on library operations will be based on publicly available information and/or consultation with Bronx Public Library officials. If applicable, holdings per resident may be estimated to provide a quantitative gauge of available resources in the applicable branch libraries in order to form a baseline for the analysis.

- For No-Action conditions, projections of population change in the area and information on any planned changes in library services or facilities will be described, and the effects of these changes on library services will be assessed. Using the information gathered for existing conditions, holdings per resident in the No-Action condition will be estimated.
- The effects of the addition of the population resulting from the Proposed Actions on the library's ability to provide information services to its users will be assessed. Holdings per resident in the With-Action condition will be estimated and compared to the No-Action holdings estimate.
- If the Proposed Actions would increase a branch library's ¼-mile study area population by five percent or more over No-Action levels, and it is determined, in consultation with the Bronx Public Library, that this increase would impair the delivery of library services in the study area, a significant adverse impact may occur, warranting consideration of mitigation.

Child Care Centers

- Existing publicly funded child care centers within approximately two miles of the rezoning area will be identified. Each facility will be described in terms of its location, number of slots (capacity), enrollment, and utilization in consultation with the Administration of Children's Services (ACS).
- For No-Action conditions, information will be obtained for any changes planned for child care programs or facilities in the area, including the closing or expansion of existing facilities and the establishment of new facilities. Any expected increase in the population of children under age six within the eligibility income limitations, using the No-Action RWCDs (see "Analysis Framework"), will be discussed as potential additional demand, and the potential effect of any population increases on demand for child care services in the study area will be assessed. The available capacity or resulting deficiency in slots and the utilization rate for the study area will be calculated for the No-Action condition.
- The potential effects of the additional eligible children resulting from the Proposed Actions will be assessed by comparing the estimated net demand over capacity to a net demand over capacity in the No-Action analysis.
- A determination of whether the Proposed Actions would result in significant adverse impacts to child care centers will be made. A significant adverse impact may result, warranting consideration of mitigation, if the Proposed Actions would result in both of the following: (1) a collective utilization rate of the group child care centers in the study area that is greater than 100 percent in the With-Action condition; and (2) an increase of five percent or more in the collective utilization rate of child care centers in the study area between the No-Action and With-Action conditions.

TASK 5. OPEN SPACE

If a project may add population to an area, demand for existing open space facilities would typically increase. Indirect effects may occur when the population generated by the proposed project would be sufficiently large to noticeably diminish the ability of an area's open space to serve the future population. For the majority of projects, an assessment is conducted if the proposed project would generate more than 200 residents or 500 employees, or a similar number of other uses. However, the need for an open space assessment may vary in certain areas of the City that are considered either underserved or well-served by open space; if a project is located in an underserved area, an open space assessment should be conducted if that project would generate more than 50 residents or 125 workers. The proposed Special Jerome Avenue District encompasses areas that are neither underserved nor well-served, as well as an underserved area in the Fordham neighborhood, and exceeds the respective residential and worker analysis thresholds. Therefore, an assessment of both residential and nonresidential open space is warranted and will be provided in the EIS. The open space analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

The open space analysis will consider both passive and active open space resources. Passive open space ratios will be assessed within a nonresidential (¼-mile radius) study area and a residential (½-mile radius) study area. Active open space ratios will be assessed for the ½-mile residential study area. Both study areas would generally comprise those census tracts that have 50 percent or more of their area located within the ¼-mile radius and ½-mile radius of the rezoning area, respectively.² The resultant open space study area is shown on Figure 7. In addition, these study areas are also considered in terms of a northern portion and a southern portion in order to provide a generalized understanding of differences that may exist.

Special consideration will be given to Census Tract 63, which has less than 50 percent of its total land area within a ½-mile radius of the rezoning area, but which contains several large open spaces and is immediately adjacent to the rezoning area at its northern border. In order to account for Census Tract 63's unique position in this study, only open spaces north of 161st Street will be included in the analysis, while the entire population of the census tract will be included in the analysis, providing for a more conservative analysis. Further, due to the large area covered by the worker and residential study areas, two subareas will be defined to provide a more refined analysis of the northern (north of the Cross-Bronx Expressway) and southern (south of the Cross-Bronx Expressway) portions of the study areas.

The detailed open space analysis in the EIS will include the following subtasks:

- Characteristics of the two open space user groups (residents and workers/daytime users) will be determined. To determine the number of residents in the study areas, 2010 Census data will be compiled for census tracts comprising the nonresidential and residential open space study areas. As the study areas may include a workforce and daytime population that may also use

² ¼-mile and ½-mile radii adjusted to be coterminous with the boundaries of census tracts with existing populations that have 50 percent of their area within the radii; the ¼-mile and ½-mile radii were not adjusted to be coterminous with census tracts without existing populations (e.g., census tracts entirely comprised of open space).

open spaces, the number of employees and daytime workers in the study areas will also be calculated, based on reverse journey-to-work census data.

- Existing active and passive open spaces within the ¼-mile and ½-mile open space study areas will be inventoried and mapped. The condition and usage of existing facilities will be described based on the inventory and field visits. In accordance with guidelines, field surveys of the ¼-mile and ½-mile study area open space resources will be conducted during peak hours of use and in good weather. Passively programmed open spaces will be visited during peak weekday midday hours and actively programmed open spaces (or actively programmed portions of open spaces that have both active and passive open space resources) will be visited during both weekday midday and peak weekend hours. Acreages of these facilities will be determined and the total study area acreages will be calculated. The percentage of active and passive open space will also be calculated.
- Based on the inventory of facilities and study area populations, total, active, and passive open space ratios will be calculated for the residential and worker populations and compared to City guidelines to assess adequacy. Open space ratios are expressed as the amount of open space acreage (total, passive, and active) per 1,000 user population.
- Expected changes in future levels of open space supply and demand in the 2026 analysis year will be assessed, based on other planned development projects within the open space study areas. Any new open space or recreational facilities that are anticipated to be operational by the analysis year will also be accounted for. Open space ratios will be calculated for future No-Action conditions and compared with existing ratios to determine changes in future levels of adequacy.
- Effects on open space supply and demand resulting from increased residential and worker populations added under the RWCDs associated with the Proposed Actions will be assessed. The assessment of the Proposed Action's impacts will be based on a comparison of open space ratios for the future No-Action versus future With-Action conditions. In addition to the quantitative analysis, a qualitative analysis will be performed to determine if the changes resulting from the Proposed Actions constitute a substantial change (positive or negative) or an adverse effect to open space conditions. The qualitative analysis will assess whether or not the study areas are sufficiently served by open space, given the type (active vs. passive), capacity, condition, and distribution of open space, and the profile of the study area populations.

TASK 6. SHADOWS

A shadows analysis assesses whether new structures resulting from a proposed action would cast shadows on sunlight sensitive publicly accessible resources or other resources of concern, such as natural resources, and to assess the significance of their impact. This chapter will examine the Proposed Actions' potential for significant and adverse shadow impacts. Generally, the potential for shadow impacts exists if an action would result in new structures or additions to buildings resulting in structures over 50 feet in height that could cast shadows on important natural features, publicly accessible open space, or on historic features that are dependent on sunlight. New construction or building additions

resulting in incremental height changes of less than 50 feet can also potentially result in shadow impacts if they are located adjacent to, or across the street from, a sunlight-sensitive resource. The shadows analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

The Proposed Actions would permit development of buildings greater than 50 feet in height and therefore has the potential to result in shadow impacts in the areas to be rezoned. The EIS will assess the RWCDs on a site-specific basis for potential shadowing effects of new developments at both the projected and potential development sites on sunlight-sensitive uses and disclose the range of shadow impacts, if any, which are likely to result from the Proposed Actions. The shadows analysis in the EIS will include the following subtasks:

- A preliminary shadows screening assessment will be prepared to ascertain whether the projected and potential developments' shadows may potentially reach any sunlight-sensitive resources at any time of year.
 - A Tier 1 Screening Assessment will be conducted to determine the longest shadow study area for the projected and potential developments, which is defined as 4.3 times the height of a structure (the longest shadow that would occur on December 21, the winter solstice). A base map that illustrates the locations of the projected and potential developments in relation to the sunlight-sensitive resources will be developed.
 - A Tier 2 Screening Assessment will be conducted if any portion of a sunlight-sensitive resource lies within the longest shadow study area. The Tier 2 assessment will determine the triangular area that cannot be shaded by the projected and potential developments, which in New York City is the area that lies between -108 and +108 degrees from true north.
 - If any portion of a sunlight-sensitive resource is within the area that could be potentially shaded by the projected or potential developments, a Tier 3 Screening Assessment will be conducted. The Tier 3 Screening Assessment will determine if shadows resulting from the projected and potential developments can reach a sunlight-sensitive resource through the use of three-dimensional computer modeling software with the capacity to accurately calculate shadow patterns. The model will include a three-dimensional representation of the sunlight-sensitive resource(s), a three-dimensional representation of the projected and potential development sites identified in the RWCDs, and a three-dimensional representation of the topographical information within the area to determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the Proposed Actions.
- If the screening analysis does not rule out the possibility that action-generated shadows would reach any sunlight-sensitive resources, a detailed analysis of potential shadow impacts on publicly-accessible open spaces or sunlight-sensitive historic resources resulting from development in the RWCDs (both projected and potential development sites) will be provided in the EIS. The detailed shadow analysis will establish a baseline condition (No-Action), which will be compared to the future condition resulting from the Proposed Actions (With-Action) to illustrate the shadows cast by existing or future buildings and distinguish the additional (incremental) shadow cast by the projected and potential developments. The detailed analysis will include the following tasks:

- The analysis will be documented with graphics comparing shadows resulting from the No-Action condition with shadows resulting from the Proposed Actions, with incremental shadow highlighted in a contrasting color.
- A summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource will be provided.
- The significance of any shadow impacts on sunlight-sensitive resources will be assessed.

TASK 7. HISTORIC AND CULTURAL RESOURCES

Historic resources are identified as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. This includes designated New York City Landmarks; properties calendared for consideration as landmarks by the New York City Landmarks Preservation Commission (LPC); properties listed on the State/National Register of Historic Places (S/NR) or contained within a district listed on or formally determined eligible for S/NR listing; properties recommended by the New York State Board for Listing on the S/NR; National Historic Landmarks; and properties not identified by one of the programs listed above, but that meet their eligibility requirements. As the Proposed Actions would induce development that could result in new in-ground disturbance and construction of a building type(s) that could compromise the historic context of the area, it has the potential to result in impacts to archaeological and architectural resources. The historic and cultural resources analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

Impacts on historic resources are considered on the affected site and in the area surrounding identified development sites. The historic resources study area is therefore defined as the proposed Special Jerome Avenue District, plus a 400-foot radius. Archaeological resources are considered only for projected and potential development sites where new in-ground disturbance would occur compared to No-Action conditions. Impacts to historic resources may result from both temporary (e.g., related to construction process) and permanent (e.g., related to long-term or permanent result of the proposed project or construction project) activities.

This chapter will include an overview of the study area's history and land development. Subtasks will include:

- Land use in the study area will be researched and described.
- In consultation with LPC, those areas thought to be potentially archaeologically sensitive will be identified.
- Projected and potential development sites where new in-ground disturbance is expected to occur as a result of the Proposed Actions will be identified.

- A Phase 1A Archaeological Documentary Report will be prepared for projected and potential developments sites identified as archaeologically sensitive where new in-ground disturbance is expected to occur as a result of the Proposed Actions and will be submitted to LPC for review. The Phase 1A will include an evaluation of archaeological resources within each of the development sites of concern documenting the site history, its development and use, and the potential to host significant archaeological resources. The EIS will summarize the results of the Phase IA report.
- If any development sites are identified as having archaeological potential in the Phase 1A report and LPC concurs, the Proposed Actions' effect on those resources will be evaluated to determine if a significant adverse impact would result due to the Proposed Actions. If it is found that a significant adverse impact to archaeological resources would occur, LPC will be consulted on what, if any, mitigation measures may be available to address those impacts.
- In consultation with LPC, known and eligible architectural resources in the study area were identified. There is one designated historic district, Morris Avenue Historic District, within the rezoning area and there is one designated historic district, Grand Concourse Historic District, within approximately 400 feet of the proposed Special Jerome Avenue District; these historic districts will be identified, mapped, and described.
- Probable impacts of the developments resulting from the Proposed Actions on architectural resources will be assessed. The assessment would address the following: (a) would there be a physical change to the property; or (b) would there be a physical change to its setting, such as context or visual prominence ("indirect impacts"), and, if so, is the change likely to alter or eliminate the significant characteristics of the resource that make it important.

TASK 8. URBAN DESIGN AND VISUAL RESOURCES

Urban design is the totality of components that may affect a pedestrian's experience of public space. An assessment of urban design and visual resources is appropriate when there is the potential for a pedestrian to observe, from the street level, a physical alteration beyond that allowed by existing zoning. When an action would potentially obstruct view corridors, compete with icons in the skyline, or would result in substantial alterations to the streetscape of the neighborhood by noticeably changing the scale of buildings, a more detailed analysis of urban design and visual resources would be appropriate. The urban design and visual resources analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

As the Proposed Actions would rezone some areas to allow higher density and create new zoning districts to be mapped within the study area, a preliminary assessment of urban design and visual resources will be provided in the EIS.

The urban design study area will be the same as that used for the land use analysis (delineated by a ¼-mile radius from the proposed Special Jerome Avenue District boundary). For visual resources, the view corridors within the study area from which such resources are publicly viewable should be identified. The preliminary assessment will consist of the following:

- Based on field visits, the urban design and visual resources of the directly affected area and adjacent study area will be described using text, photographs, and other graphic material, as necessary, to identify critical features, use, bulk, form, and scale.
- In coordination with Task 2, Land Use, the changes expected in the urban design and visual character of the study area due to known development projects in the future No-Action condition will be described.
- Potential changes that could occur in the urban design character of the study area as a result of the Proposed Actions will be described. For the projected and potential development sites, the analysis will focus on general building types for the sites that are assumed for development, as well as elements such as street wall height, setback, and building envelope. Photographs and/or other graphic material will be utilized, where applicable, to assess the potential effects on urban design and visual resources, including view of/to resources of visual or historic significance.

A detailed analysis will be prepared if warranted based on the preliminary assessment. Examples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline. The detailed analysis would describe the projected and potential development sites and the urban design and visual resources of the surrounding area. The analysis would describe the potential changes that could occur to urban design and visual resources in the future with the Proposed Actions condition, in comparison to the future without the Proposed Actions condition, focusing on the changes that could negatively affect a pedestrian's experience of the area. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

TASK 9. HAZARDOUS MATERIALS

A hazardous materials assessment determines whether a proposed action may increase the exposure of people or the environment to hazardous materials, and, if so, whether this increased exposure would result in potential significant public health or environmental impacts. The potential for significant impacts related to hazardous materials can occur when: (a) elevated levels of hazardous materials exist on a site and the project would increase pathways to human or environmental exposures; (b) a project would introduce new activities or processes using hazardous materials and the risk of human or environmental exposure is increased; or (c) the project would introduce a population to potential human or environmental exposure from off-site sources. The hazardous materials analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

The hazardous materials assessment will determine which, if any, of the Proposed Action's projected and potential development sites may have been adversely affected by present or historical uses at or adjacent to the sites. For some proposed projects (e.g., area-wide rezonings), portions of the typical scope for a Phase I Environmental Site Assessment (ESA), such as site inspections, may not be possible. The Proposed Actions include an area-wide rezoning, and only a portion of one of the identified projected and potential development sites is in City ownership. As such, a preliminary screening assessment will be conducted for the projected and potential development sites to determine which sites warrant an

institutional control, such as an (E) designation, in accordance with Section 11-15 (Environmental Requirements) of the Zoning Resolution of the City of New York and Chapter 24 of Title 15 of the Rules of the City of New York governing the placement of (E) designations³.

The hazardous materials assessment will include the following tasks:

- Perform exterior site inspections of each parcel to identify any possible monitoring wells, vent pipes, and/or manufacturing/commercial/industrial uses that could indicate environmental impact.
- Review existing information sources such as Sanborn Fire Insurance Maps and City directories for the projected and potential development sites and the surrounding area, to develop a profile of the historical uses of properties.
- Review and evaluate relevant existing data to assess the potential for environmental concerns on the subject sites.
- Prepare a summary of findings and conclusions for inclusion in the EIS to determine where (E) designations may be appropriate.

TASK 10. WATER AND SEWER INFRASTRUCTURE

The water and sewer infrastructure assessment determines whether a proposed action may adversely affect the City's water distribution or sewer system and, if so, assess the effects of such actions to determine whether their impact is significant. As shown in the EAS, an analysis of water supply is not warranted, as the RWCDs associated with the Proposed Actions is not expected to result in an incremental water demand of more than one million gallons per day (gpd) compared to No-Action conditions. A preliminary assessment of the Proposed Actions' effects on wastewater and stormwater infrastructure is warranted as the RWCDs for the Proposed Actions would result in the development of more than 400 dwelling units. Therefore, this chapter will analyze the Proposed Actions' potential effects on the wastewater and stormwater infrastructure. The sewer infrastructure analysis will consider the potential for significant adverse impacts resulting from the RWCDs for the Proposed Actions. The New York City Department of Environmental Protection (DEP) will be consulted in preparation of this assessment. The water and sewer infrastructure analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

³ A hazardous materials (E) designation is an institutional control that can be placed as a result of the review of a zoning map or zoning text amendment or action pursuant to the Zoning Resolution. It provides a mechanism to ensure that testing for and mitigation and/or remediation of hazardous materials, if necessary, are completed prior to, or as part of, future development of the affected site, thereby eliminating the potential for a hazardous materials impact.

Wastewater and Stormwater Infrastructure

- The appropriate study area for the assessment will be established in consultation with DEP. The Proposed Actions' directly affected area is primarily located within the service area of the Wards Island Wastewater Treatment Plant (WWTP).
- The existing stormwater drainage system and surfaces (pervious or impervious) on the projected development sites will be described, and the amount of stormwater generated on those sites will be estimated using DEP's volume calculation worksheet.
- The existing sewer system serving the rezoning area will be described based on records obtained from DEP. The existing flows to the Wards Island WWTP, which serves the directly affected area, will be obtained for the latest twelve-month period, and the average dry weather monthly flow will be presented.
- Any changes to the stormwater drainage plan, sewer system, and surface area expected in the future without the Proposed Actions will be described, as warranted.
- Future stormwater generation from the projected development sites will be assessed to determine the Proposed Actions' potential to result in impacts. Changes to the projected development sites' surface area will be described, runoff coefficients and runoff for each surface type/area will be presented, and volume and peak discharge rates from the sites will be determined based on the DEP volume calculation worksheet.
- Sanitary sewage generation for the projected development sites identified in the RWCDs will also be estimated. The effects of the incremental demand on the system will be assessed to determine if there will be any impact on operations of the Wards Island WWTP.

A more detailed assessment may be required if increased sanitary or stormwater discharges from the RWCDs associated with the Proposed Actions are predicted to affect the capacity of portions of the existing sewer system, exacerbate combined sewer overflow (CSO) volumes/frequencies, or contribute greater pollutant loadings in stormwater discharged to receiving water bodies. The scope of a more detailed analysis, if necessary, will be developed based on conclusions from the preliminary infrastructure assessment and coordinated with DEP.

TASK 11. SOLID WASTE AND SANITATION SERVICES

A solid waste assessment determines whether an action has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan or with State policy related to the City's integrated solid waste management system. The Proposed Actions would induce new development that would require sanitation services. If a project's generation of solid waste in the With-Action condition would not exceed 50 tons per week, it may be assumed that there would be sufficient public or private carting and transfer station capacity in the metropolitan area to absorb the increment, and further analysis generally would not be required. As the Proposed Actions are expected to result in a net

increase of more than 50 tons per week, compared to No-Action conditions, an assessment of solid waste and sanitation services is warranted. The solid waste and sanitation services analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

This chapter will provide an estimate of the additional solid waste expected to be generated by the projected development sites under the RWCDs and assesses its effects on the City's solid waste and sanitation services. This assessment will:

- Describe existing and future New York City solid waste disposal practices.
- Estimate solid waste generation by the RWCDs projected development sites for existing, No-Action, and With-Action conditions.
- Assess the impacts of the Proposed Actions' solid waste generation (projected developments) on the City's collection needs and disposal capacity. The Proposed Actions' consistency with the City's Solid Waste Management Plan will also be assessed.

TASK 12. ENERGY

In most cases, an action does not need a detailed energy assessment, but its operational energy is projected. A detailed energy assessment is limited to actions that may significantly affect the transmission or generation of energy. For other actions, in lieu of a detailed assessment, the estimated amount of energy that would be consumed annually as a result of the day-to-day operation of the buildings and uses resulting from an action is disclosed. The energy analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

An analysis of the anticipated additional demand from the Proposed Actions' RWCDs will be provided in the EIS. The power utility serving the area, Consolidated Edison (Con Edison) of New York, will be consulted in preparation of the energy impact analysis. The EIS will disclose the projected amount of energy consumption during long-term operation resulting from the Proposed Actions. The projected amount of energy consumption during long-term operation (for projected development sites) will be estimated based on the average and annual whole-building energy use rates for New York City. If warranted, the Mayor's Office of Sustainability (MOS) and/or Con Edison will be consulted.

TASK 13. TRANSPORTATION

The objective of a transportation analysis is to determine whether a proposed action may have a potential significant impact on traffic operations and mobility, public transportation facilities and services, pedestrian elements and flow, the safety of all roadway users (pedestrians, bicyclists and motorists), on-and off-street parking, or goods movement. The Proposed Actions are expected to induce new residential and commercial uses, which would generate additional vehicular travel and demand for parking, as well as additional subway and bus riders and pedestrian traffic. These new trips have the potential to affect the area's transportation systems. Therefore, the transportation studies will be a key

focus of the EIS. The transportation analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

Travel Demand and Screening Assessment

A detailed travel demand forecast has been prepared using standard sources, including U.S. census data, previously-approved studies, and other references. The travel demand forecast (a Level-1 screening assessment) is summarized by peak hour, mode of travel, as well as person and vehicle trips. The travel demand forecast also identifies the number of peak hour person trips made by transit and the numbers of walk trips that would use the area's sidewalks, corner areas, and crosswalks. The results of this forecast have been summarized in a Transportation Planning Factors and Travel Demand Forecast (TPF/TDF) technical memorandum (refer to Appendix 3). In addition to the travel demand forecast, detailed vehicle, pedestrian and transit trip assignments (a Level-2 screening assessment) will be prepared to validate the intersections and pedestrian/transit elements selected for quantified analysis.

Traffic

The EIS will provide a detailed traffic analysis focusing on those peak hours and street network intersections where the highest concentrations of action-generated demand would occur. The peak hours for analysis will be selected, and the specific intersections to be included in the traffic study area will be determined based upon the assignment of project-generated traffic and the threshold of 50 additional vehicle trips per hour.

The RWCDs exceeds the minimum development density screening thresholds. Therefore, a travel demand forecast is required to determine if the Proposed Actions would generate 50 or more vehicle trips in any peak hour. Based on a preliminary forecast, the Proposed Actions are expected to generate more than 50 additional vehicular trips in the weekday AM, midday, and PM peak hours, as well as the Saturday midday.

Based on a preliminary vehicle trip assignment, it is anticipated that the traffic study area will include 37 intersections for analysis and includes:

1. Jerome Avenue at Kingsbridge Road
2. Jerome Avenue at Fordham Road
3. Jerome Avenue at 184th Street
4. Jerome Avenue at East 183rd Street
5. Jerome Avenue at West 183rd Street
6. Jerome Avenue at West 182nd Street
7. Jerome Avenue at West 181st Street
8. Jerome Avenue at Burnside Avenue
9. Jerome Avenue at Tremont Avenue
10. Jerome Avenue at West 176th Street
11. Jerome Avenue at East 176th Street
12. Jerome Avenue at 175th Street
13. Jerome Avenue at I-95 Westbound Ramps
14. Jerome Avenue at Featherbed Lane

15. Jerome Avenue at I-95 Eastbound Ramps
16. Jerome Avenue at Mt. Eden Avenue
17. Jerome Avenue at Macombs Road
18. Jerome Avenue at 172nd Street
19. Jerome Avenue at 170th Street
20. Jerome Avenue at 167th Street/Edward L Grant Hwy
21. Jerome Avenue at 165th Street
22. Jerome Avenue at 164th Street
23. Jerome Avenue at Macombs Dam Bridge
24. Grand Concourse at Burnside Avenue
25. Grand Concourse at Tremont Avenue
26. Grand Concourse at 176th Street
27. Grand Concourse at Mt. Eden Avenue
28. Grand Concourse at 170th Street
29. Grand Concourse at 167th Street
30. Inwood Avenue at West 170th Street
31. Cromwell Avenue at West 170th Street
32. University Avenue at Washington Bridge On-Ramps
33. University Avenue at Washington Bridge Off-Ramps
34. Edward L. Grant Highway at 170th Street
35. Edward L. Grant Highway at West 169th Street
36. River Avenue at 167th Street
37. Macombs Road at West 172nd Street

The following outlines the anticipated scope of work for conducting a traffic impact analysis for the Proposed Actions' RWCDs:

- Select peak hours for analysis and define a traffic study area consisting of intersections to be analyzed within and in proximity to the rezoning area and along key routes leading to and from the rezoning area.
- Conduct a count program for traffic analysis locations that includes a mix of automatic traffic recorder (ATR) machine counts and intersection turning movement counts, along with vehicle classification counts and travel time studies (speed runs) as support data for air quality and noise analyses. Turning movement count data will be collected at each analyzed intersection during the weekday and Saturday peak hours, and will be supplemented by nine days of continuous ATR counts. Vehicle classification count data will be collected during each peak hour at several representative intersections along each of the principal corridors in the study area. The turning movement counts, vehicle classification counts and travel time studies will be conducted concurrently with the ATR counts. The count program will be adequate to address input parameters for MOVES. Where applicable, available information from recent studies in the vicinity of the study area will be compiled, including data from such agencies as the New York City Department of Transportation (DOT) and DCP.
- Inventory physical data at each of the analysis intersections, including street widths, number of traffic lanes and lane widths, pavement markings, turn prohibitions, bicycle routes and curbside parking regulations. Signal phasing and timing data for each signalized intersection included in

the analysis will be obtained from DOT and will be field verified.

- Determine existing traffic operating characteristics at each analysis intersection including capacities, volume-to-capacity (v/c) ratios, average vehicle delays, and levels of service (LOS) per lane group and per overall intersection. 85th percentile queues will also be determined by lane group at all signalized intersections. This analysis will be conducted using the 2000 *Highway Capacity Manual* (HCM) methodology with the latest approved Highway Capacity Software (HCS).
- Based on available sources, Census data and standard references, estimate the travel demand from projected development sites in the future without the Proposed Actions (the No-Action condition), as well as the demand from other major developments planned in the vicinity of the study area by the 2026 analysis year. This will include total daily and peak hour person and vehicular trips, and the distribution of trips by auto, taxi, and other modes. A truck trip generation forecast will also be prepared based on data from previous relevant studies. Mitigation measures accepted for all No-Action projects as well as other DOT initiatives will be included in the future No-Action network, as applicable.
- Compute the future 2026 No-Action traffic volumes based on approved background traffic growth rates for the study area (0.25 percent per year for years one through five, 0.125 percent for years six through ten) and demand from major development projects expected to be completed in the future without the Proposed Action. Incorporate any planned changes to the roadway system anticipated by 2026, and determine the No-Action v/c ratios, delays, and levels of services at analyzed intersections.
- Based on available sources, Census data, and standard references, develop a travel demand forecast for projected development sites based on the net change in uses compared to the No-Action condition as defined in the RWCDs. Determine the net change in vehicle trips expected to be generated by projected development sites under the Proposed Actions as described in the Transportation Planning Factors (TPF) technical memorandum and approved by DCP in consultation with DOT. Assign the net project-generated trips in each analysis period to likely approach and departure routes, and prepare traffic volume networks for the 2026 future with the Proposed Actions condition for each analyzed peak hour.
- Determine the v/c ratios, delays, and LOS at analyzed intersections for the With-Action condition, and identify significant adverse traffic impacts.
- Identify and evaluate potential traffic mitigation measures, as appropriate, for all significantly impacted locations in the study area in consultation with the lead agency and DOT. Potential traffic mitigation could include both operational and physical measures such as changes to lane striping, curbside parking regulations and traffic signal timing and phasing, roadway widening, and the installation of new traffic signals. Where impacts cannot be mitigated, they will be described as unavoidable adverse impacts.

Transit

Detailed transit analyses are generally not required if a proposed action is projected to result in fewer than 200 peak hour rail or bus transit trips according to the general thresholds used by the Metropolitan Transportation Authority (MTA). If a proposed action would result in 50 or more bus trips being assigned to a single bus line (in one direction), or if it would result in an increase of 200 or more trips at a single subway station or on a single subway line, a detailed bus or subway analysis would be warranted. Transit (both subway and bus) analyses generally examine conditions during the weekday AM and PM commuter peak periods, as it is during these times that overall transit demand (and the potential for significant adverse impacts) is typically greatest.

The Proposed Actions' RWCDs is expected to generate a net increase of more than 200 additional subway trips and bus trips in one or more peak hours, and would therefore require detailed transit analyses.

Subway

There are a total of 12 subway stations located in the rezoning area or within close proximity that would potentially be utilized by action-generated trips. Transit analyses typically focus on the weekday AM and PM commuter peak hours when overall demand on the subway and bus systems is usually highest. The detailed transit analyses will include the following subtasks:

- Identify for analysis, in consultation with New York City Transit Authority, those subway stations expected to be utilized by 200 or more action-generated trips in one or more peak hours. At each of these stations, analyze those stairway, door, and fare entrance control elements expected to be used by significant concentrations of action-generated demand in the weekday AM and PM peak hours.
- Conduct counts of existing weekday AM and PM peak hour demand at analyzed subway station elements and determine existing v/c ratios and levels of service.
- Determine volumes and conditions at analyzed subway station elements in the future without the Proposed Actions using approved background growth rates and accounting for any trips expected to be generated by No-Action development on projected development sites or other major projects in the vicinity of the study area.
- Add project-generated demand to the No-Action volumes at analyzed subway station elements and determine AM and PM peak hour volumes and conditions in the future with the Proposed Actions.
- Identify potential significant adverse impacts at subway station stairways and fare control elements.
- As the Proposed Actions are expected to generate 200 or more new subway trips in one direction on one or more of the three subway routes serving the rezoning area, subway line haul conditions will also be assessed in the EIS.

- Mitigation needs and potential subway station improvements will be identified, as appropriate, in conjunction with the lead agency and NYC Transit.

Bus

The area of the Proposed Actions is served by approximately 11 local bus routes operated by Metropolitan Transportation Authority-New York City Transit (MTA-NYCT) and MTA Bus that connect the area with other parts of the Bronx. A detailed analysis of bus conditions is generally required if a proposed action is projected to result in 50 or more peak hour trips being assigned to a single bus route (in one direction) based on the general thresholds used by the MTA. As the incremental person-trips by bus generated by the Proposed Actions would exceed 50 peak hour trips in one direction on one or more of the nine routes serving the rezoning area, the EIS will include a quantitative analysis of local bus conditions. For that analysis, trips will be assigned to each route based on proximity to the projected development sites and current ridership patterns. The analysis will include documenting existing peak hour bus service levels and maximum load point ridership, determining conditions in the future No-Action condition, and assessing the effects of new action-generated peak hour trips. Bus transit mitigation, if warranted, will be identified in consultation with the lead agency and the MTA.

Pedestrians

Projected pedestrian volumes of less than 200 persons per hour at any pedestrian element (sidewalks, corner areas, and crosswalks) would not typically be considered significant, since the level of increase would not generally be noticeable and therefore would not require further analysis. Based on the level of new pedestrian demand generated by the Proposed Actions' RWCDs, it is anticipated that project-generated pedestrian trips would exceed the 200-trip threshold at one or more locations in one or more peak hours. A detailed pedestrian analysis will therefore be prepared for the EIS focusing on selected sidewalks, corner areas, and crosswalks along corridors that would experience more than 200 additional peak hour pedestrian trips for the weekday AM, midday, PM, and Saturday midday peak periods. Pedestrian counts will be conducted at each analysis location and used to determine existing levels of service. No-Action and With-Action pedestrian volumes and levels of service will be determined based on approved background growth rates, trips expected to be generated by No-Action development on projected development sites and other major projects in the vicinity of the study area, and action-generated demand. The specific pedestrian facilities to be analyzed will be determined in consultation with the lead agency once the assignment of action-generated pedestrian trips has been finalized. The analysis will evaluate the potential for incremental demand from the Proposed Actions to result in significant adverse impacts. Potential measures to mitigate any significant adverse pedestrian impacts will be identified and evaluated, as warranted, in consultation with the lead agency and DOT.

Vehicular and Pedestrian Safety

Data on traffic accidents involving vehicles, pedestrians, and/or cyclists at study area intersections will be obtained from DOT for the most recent three-year period available. These data will be analyzed to determine if any of the studied locations may be classified as high crash locations and whether vehicle and/or pedestrian trips and any street network changes resulting from the Proposed Actions would adversely affect vehicular and pedestrian safety in the area. If any high crash locations are identified,

feasible improvement measures will be explored to alleviate potential safety issues in consultation with the lead agency and DOT.

Parking

Parking demand from commercial and retail uses typically peaks in the midday period and declines during the afternoon and evening. By contrast, residential demand typically peaks in the overnight period.

It is anticipated that the on-site required accessory parking for projected development sites may not be sufficient to accommodate overall incremental demand that would be generated by the Proposed Actions. As such, detailed existing on-street parking and off-street parking inventories will be conducted for the weekday overnight period (when residential parking demand typically peaks) and the weekday midday and Saturday midday periods (when parking in a business area is frequently at peak occupancy) to document the existing supply and demand for each period. The parking analyses will document changes in the parking supply and utilization in the rezoning area and within a ¼-mile radius of the rezoning area under the No-Action and With-Action conditions based on accepted background growth rates and projected demand from No-Action and With-Action development on projected development sites and other major projects in the vicinity of the study area. Given the large size of the parking study area, localized parking conditions during the weekday midday and overnight periods will also be assessed for a sub-area encompassing a ¼-mile radius around the three largest projected development sites.

Parking demand generated by the projected residential component of the Proposed Actions' RWCDs will be forecasted based on auto ownership data for the rezoning area and the surrounding area. Parking demand from all other uses will be derived from forecasts of the daily auto trips that would be generated by these uses. Estimates of future parking utilization will account for net reductions in demand associated with No-Action land use displaced from projected development sites under the RWCDs.

The forecast of new parking supply under the RWCDs will be based on the net change in parking spaces on projected development sites. As currently contemplated, no accessory parking would be required for affordable units that may be developed in the With-Action condition. The forecast of future supply will also account for accessory parking spaces associated with the With-Action commercial uses, which have lower commercial demand in the overnight hours.

TASK 14. AIR QUALITY

An air quality assessment is required for actions that could have potential to result in significant air quality impacts. There are mobile source impacts that could arise when an action increases or causes a redistribution of traffic, creates any other mobile sources of pollutants, or adds new uses near existing mobile sources. There are mobile source impacts that could be produced by parking facilities, parking lots, or garages. Stationary source impacts could occur with actions that facilitate new development when new stationary sources, such as boiler stacks, are introduced or when a proposed development is situated near industrial sources, major or large sources. The air quality analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

Mobile Source Analysis

The increased traffic associated with the RWCDs projected development sites would have the potential to affect local air quality levels. Emissions generated by the increased traffic at congested intersections have the potential to significantly increase air quality levels at nearby sensitive land uses. Carbon monoxide (CO) and particulate matter (PM) are the primary pollutants of concern for microscale mobile source air quality analyses, including assessments of roadway intersections and parking garages.

The specific work program for the mobile source air quality study will include the following tasks:

- Existing ambient air quality data for the study area (published by the New York State Department of Environmental Conservation (NYSDEC)) will be compiled for the analysis of existing and future conditions.
- An analysis of traffic forecasts in terms of vehicular trips from auto, bus, and truck would be conducted at each intersection analyzed within the traffic network established for the EIS. Based on the comparisons with the city CO and PM_{2.5} screening threshold levels, if exceedances of either the CO or the PM_{2.5} screening thresholds occur, microscale dispersion modeling at the worst-case intersections experiencing the highest traffic volumes (Level of Service (LOS) condition of “D” or worse) would be conducted using the dispersion methods described in the Air Quality Analysis Methodology and Assumptions memorandum provided in Appendix 4.
- An analysis of CO and PM emissions will be performed for no more than two parking facilities that would have the greatest potential for impact on air quality. Cumulative impacts from on-street sources and emissions from parking garages will be calculated, where appropriate.
- Future pollutant levels with and without the Proposed Actions will be compared with the CO and PM₁₀ National Ambient Air Quality Standards (NAAQS) and the City’s CO and PM_{2.5} *de minimis* guidance criteria to determine the impacts of the Proposed Actions. It is assumed that no more than one (1) location will be assessed for CO. It is also assumed that no more than three (3) locations will be assessed for PM_{2.5} and PM₁₀.
- The consistency of the Proposed Actions with the strategies contained in the State Implementation Plan (SIP) for the area will be determined. At any receptor sites where violations of standards occur, analyses will be performed to determine what mitigation measures would be required to attain standards.

Stationary Source Analysis

The stationary source air quality analysis will determine the effects of emissions from projected and potential development sites’ fossil-fuel fired heating and hot water systems to significantly impact existing land uses or to significantly impact any of the other projected or potential development sites (i.e., project-on-project impacts). In addition, since portions of the rezoning area are located within or near manufacturing zoned districts, an analysis of emissions from industrial sources must be performed. An examination of large and major sources of emissions within 1,000 feet of the study area will also be conducted.

Heat and Hot Water Systems Analysis

- A screening level analysis will be performed to determine the potential for air quality impacts from heating and hot water systems of the projected and potential development sites.
- If the screening analysis for any site demonstrates a potential for air quality impacts, a refined modeling analysis will be performed for that development site using the AERMOD model. For this analysis, five recent years (2011-2015) of meteorological data from La Guardia Airport and concurrent upper air data from Brookhaven, New York will be utilized for the simulation program. Concentrations of nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and particulate matter (PM₁₀ and PM_{2.5}) will be determined at off-site receptors sites, as well as on projected and potential development site receptors. Predicted values will be compared with NAAQS and other relevant standards. If warranted by the analysis, requirements related to fuel type and/or exhaust stack locations will be memorialized by (E) designations placed on the blocks and lots pursuant to Section 11-15 of the New York City Zoning Resolution and the (E) Rules.
- A cumulative impact analysis will be performed for development sites with similar height located in close proximity to one another (i.e., site clusters). Impacts will be determined using the EPA AERSCREEN and or AERMOD model. In the event that violations of standards are predicted, measures to reduce pollutant levels to within standards will be examined.

Industrial Source Analysis

- A field survey will be performed to identify processing or manufacturing facilities within 400 feet of the projected and potential development sites. A copy of the air permits for each of these facilities will be requested from DEP's Bureau of Environmental Compliance.
- Facilities with sources of industrial emissions located within 400 feet of the projected or potential development sites will be considered for analysis.
- For potential development sites with identified industrial sources of air emissions, the industrial sources analysis will be performed assuming that development does take place, as well as assuming that it does not take place.
- A cumulative impact analysis will be performed for multiple source permits that emit the same air contaminant. Predicted concentrations of these compounds will be compared to NYDEC DAR-1 guideline values for short-term (SGC) and annual (AGC) averaging periods. In the event that violations of standards are predicted, measures to reduce pollutant levels to within standards will be examined.
- Potential cumulative impacts of multiple air contaminants will be determined based on the EPA's Hazard Index Approach for non-carcinogenic compounds and using the EPA's Unit Risk Factors for carcinogenic compounds. Both methods are based on equations that use EPA health risk information (established for individual compounds with known health effects) to determine the level of health risk posed by specific ambient concentrations of that compound. The derived

values of health risk are additive and can be used to determine the total risk posed by multiple air contaminants.

Large and Major Source Analysis

- An analysis of existing large and major sources of emissions (such as NYSDEC Title V permits and the EPA Envirofacts database permits) identified within 1,000 feet of the development sites will be performed to assess their potential effects of the projected and potential development sites. Predicted criteria pollutant concentrations will be predicted using the AERMOD model compared with NAAQS for NO₂, SO₂, and PM₁₀, as well as applicable criteria for PM_{2.5}. As appropriate, a cumulative analysis will also be performed with industrial sources identified in the study area.

Further details on the air quality analysis approach for the Proposed Actions is provided in the Air Quality Analysis Methodology and Assumptions memorandum provided in Appendix 4 to this document.

TASK 15. GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Increased greenhouse (GHG) emissions are changing the global climate, which is predicted to lead to wide-ranging effects on the environment, including rising sea levels, increases in temperature, and changes in precipitation levels. Although this is occurring on a global scale, the environmental effects of climate change are also likely to be felt at the local level. As the RWCDs associated with the Proposed Actions exceeds the 350,000 sf development threshold, GHG emissions generated by the Proposed Actions will be quantified and an assessment of consistency with the City's established GHG reduction goal will be performed as part of the EIS. The GHG emissions and climate change analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

The assessment will examine GHG emissions from the Proposed Action's operations, mobile sources, and construction, as outlined below.

- Sources of GHG from the development projected as part of the Proposed Actions will be identified. The pollutants for analysis will be discussed, as well as various City, State, and Federal goals, policies, regulations, standards, and benchmarks for GHG emissions.
- Fuel consumption will be estimated for the projected developments based on the calculations of energy use estimated as part of Task 12, Energy.
- GHG emissions associated with the action-related traffic will be estimated for the Proposed Actions using data from Task 13, Transportation. A calculation of vehicle miles traveled (VMT) will be prepared.
- The types of construction materials and equipment proposed will be discussed along with opportunities for alternative approaches that may serve to reduce GHG emissions associated with construction.

- A qualitative discussion of stationary and mobile sources of GHG emissions will be provided in conjunction with a discussion of goals for reducing GHG emissions to determine if the Proposed Actions are consistent with GHG reduction goals, including building efficient buildings, using clean power, transit-oriented development and sustainable transportation, reducing construction operations emissions, and using building materials with low carbon intensity.

TASK 16. NOISE

The noise analysis will examine both the Proposed Actions' potential effects on sensitive noise receptors (including residences, health care facilities, schools, open space, etc.) and the potential noise exposure at new sensitive uses introduced by the actions. If significant adverse impacts are identified, impacts would be mitigated or avoided to the greatest extent practicable. The Proposed Actions would result in new residential, commercial, and community facility and also would alter traffic conditions in the area. Noise, which is a general term used to describe unwanted sound, will likely be affected by these development changes. The noise analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

It is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed. Consequently, the noise analysis will examine the level of building attenuation necessary to meet interior noise level requirements. The following tasks will be performed:

- Based on the traffic studies conducted for Task 13, Transportation, a noise PCE screening analysis will be conducted to determine whether there are any locations where there is the potential for the RWCDs associated with the Proposed Actions to result in significant noise impacts (i.e., doubling Noise Passenger Car Equivalents (PCEs) due to action-generated traffic).
- Noise survey locations will be selected to represent sites of future sensitive uses in the RWCDs With-Action condition. These noise survey locations will be placed in areas to be analyzed for building attenuation and would focus on areas of potentially high ambient noise where residential and community facility uses are proposed.
- At the identified locations, noise measurements will be conducted during typical weekday AM, midday, and PM peak periods (coinciding with the traffic peak periods). Additional noise measurements will also be conducted during the early PM period near school locations and during the midday Saturday period. Noise measurements will be recorded in units of "A" weighted decibel scale (dBA) as well as one-third octave bands. The measured noise level descriptors will include equivalent noise level (Leq), maximum level (Lmax), minimum level (Lmin), and statistical percentile levels such as L1, L10, L50, and L90. A summary table of existing measured noise levels will be provided as part of the EIS.
- Future No-Action and With-Action noise levels will be estimated at the noise receptor locations based on acoustical fundamentals. All projections will be made utilizing the Leq and L10 noise descriptors.

- The level of building attenuation necessary (a function of the exterior noise levels) will be determined based on the highest With-Action L₁₀ noise level estimated at each monitoring site. The building attenuation requirements will be memorialized by (E) designations placed on the blocks and lots requiring specific levels of attenuation pursuant to Section 11-15 of the New York City Zoning Resolution and the (E) Rules. The EIS would include (E) designation language describing the requirements for each of the blocks and lots to which they would apply.

Further details on the noise analysis methodology and assumptions for the Proposed Actions are provided in the Noise Analysis and Methodology and Assumptions memorandum provided in Appendix 5 to this document.

TASK 17. PUBLIC HEALTH

Public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability, and premature death; and reducing inequalities in health status. The goal of the public health analysis is to determine whether adverse impacts on public health may occur as a result of a proposed project, and, if so, to identify measures to mitigate such effects. The public health analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

A public health assessment may be warranted if an unmitigated significant adverse impact is identified in other analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the Proposed Actions in any of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas.

TASK 18. NEIGHBORHOOD CHARACTER

The character of a neighborhood is established by numerous factors, including land use patterns, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other physical features that include traffic and pedestrian patterns, noise, etc. The Proposed Actions have the potential to alter certain elements contributing to the affected area's neighborhood character. Therefore, a neighborhood character analysis will be provided in the EIS. The neighborhood character analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

A preliminary assessment of neighborhood character will be provided in the EIS to determine whether changes expected in other technical analysis areas—land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; transportation; and noise—may affect a defining feature of neighborhood character. The preliminary assessment will:

- Identify the defining features of the existing neighborhood character.
- Summarize changes in the character of the neighborhood that can be expected in the future

With-Action condition and compare to the future No-Action condition.

- Evaluate whether the Proposed Actions have the potential to affect these defining features, either through the potential for a significant adverse impact or a combination of moderate effects in the relevant technical areas.

If the preliminary assessment determines that the Proposed Actions could affect the defining features of neighborhood character, a detailed analysis will be conducted.

TASK 19. CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction impacts are usually important when construction activity has the potential to affect transportation conditions, archaeological resources and the integrity of historic resources, community noise patterns, air quality conditions, and mitigation of hazardous materials. Multi-sited projects with overall construction periods lasting longer than two years and that are near to sensitive receptors should undergo a preliminary impact assessment. This chapter of the EIS will provide a preliminary impact assessment based on a conceptual construction schedule with anticipated RWCDs construction timelines for each of the projected development sites. The preliminary assessment will evaluate the duration and intensity of the disruption or inconvenience to nearby sensitive uses. The construction analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

If the preliminary assessment indicates the potential for a significant impact during construction, a detailed construction impact analysis will be undertaken and reported in the EIS. Technical areas to be assessed include the following:

- *Transportation Systems:* The assessment will quantitatively consider losses in lanes, sidewalks, and other transportation services on the adjacent streets during the various phases of construction and identify the increase in vehicle trips from construction workers and equipment. A travel demand forecast for the RWCDs peak construction and construction/operation period(s) will be prepared.
- *Air Quality:* The construction air quality impact section will include a quantitative discussion of both mobile air source emissions from construction equipment and worker and delivery vehicles, as well as fugitive dust emissions. It will provide measures to reduce impacts.
- *Noise:* The construction noise impact section will contain a quantitative discussion of noise from construction activity.
- *Other Technical Areas:* As appropriate, other areas of environmental assessment—such as historic resources, hazardous materials, socioeconomic conditions, and neighborhood character—will be analyzed for potential construction-related impacts. The construction analysis will include an assessment of whether construction of the projected development sites would potentially physically impact, or inhibit access to, adjacent land uses, including community facilities.

TASK 20. MITIGATION

Where significant adverse impacts have been identified in Tasks 2 through 19, measures to mitigate those impacts will be described. The chapter will also consider when mitigation measures will need to be implemented. These measures will be developed and coordinated with the responsible City/State agencies, as necessary, including the LPC, DOT, New York City Department of Parks and Recreation (DPR), and DEP. Where impacts cannot be fully mitigated, they will be described as unavoidable adverse impacts.

TASK 21. ALTERNATIVES

The purpose of an alternatives section in an EIS is to examine development options that would tend to reduce action-related impacts. The alternatives will be better defined once the full extent of the Proposed Actions' impacts have been identified. Typically for area-wide actions, such as the Proposed Actions, the alternatives will include a No-Action Alternative, a no impact or no unmitigated significant adverse impact alternative, and a lesser density alternative; therefore the EIS will include the evaluation of a No-Action Alternative, a No Unmitigated Significant Adverse Impacts Alternative, a Lower Density Alternative, and an Expanded Rezoning Area Alternative. The alternatives analysis will follow the guidance of the *CEQR Technical Manual*; specific methodologies are described herein.

The alternatives analysis will be qualitative, except in those technical areas where significant adverse impacts for the Proposed Actions have been identified. The level of analysis provided will depend on an assessment of project impacts determined by the analysis connected with the appropriate tasks.

TASK 22. EIS SUMMARY CHAPTERS

The EIS will include the following three summary chapters, where appropriate to the Proposed Action:

- *Unavoidable Adverse Impacts*: which summarizes any significant adverse impacts that are unavoidable if the Proposed Actions are implemented regardless of the mitigation employed (or if mitigation is not feasible).
- *Growth-Inducing Aspects of the Proposed Action*: which generally refer to “secondary” impacts of the Proposed Actions that trigger further development.
- *Irreversible and Irretrievable Commitments of Resources*: which summarizes the Proposed Actions and its impact in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long term.

TASK 23. EXECUTIVE SUMMARY

The executive summary will utilize relevant material from the body of the EIS to describe the Proposed Actions, their environmental impacts, measures to mitigate those impacts, and alternatives to the Proposed Actions. The executive summary will be written in enough detail to facilitate drafting of a notice of completion by the lead agency.

Appendices

Appendix 1: List of Blocks and Lots Included in Proposed Special Jerome Avenue District

Appendix 2: Detailed RWCDs Tables

Appendix 3: Transportation Planning Factors and Travel Demand Forecast Memorandum

Appendix 4: Air Quality Analysis Methodology and Assumptions Memorandum

Appendix 5: Noise Analysis Methodology and Assumptions Memorandum

Appendix 6: Construction-Related Transportation Analysis Methodology Memorandum

Appendix 7: Construction-Related Air Quality Analysis Methodology Memorandum

Appendix 8: Construction-Related Noise and Vibration Analysis Methodology Memorandum

Appendix 9: Response to Comments on the Draft Scope of Work

Appendix 10: Written Comments on the Draft Scope of Work

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Appendix 1

List of Blocks and Lots Included in Proposed Special Jerome Avenue District

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Block	Lots
2463	34 (p/o), 40, 46 (p/o)
2465	1 (p/o) , 50 (p/o)
2479	19, 24
2480	8 (p/o)
2487	10, 20, 30, 32, 38, 42
2488	1, 12, 14, 20, 23, 25 (p/o)
2489	1, 5, 6, 8, 11, 14, 25, 26, 27, 29, 30, 33, 54, 60, 71, 77
2496	52, 58, 64 (p/o), 73(p/o), 81 (p/o)
2506	40 (p/o), 44, 54, 62, 87, 89, 91, 94, 98, 100, 102, 104, 125, 127, 129, 132, 133, 134, 136, 138, 147, 164
2520	1, 12, 32, 45
2521	15, 24,
2522	65, 68, 70, 81, 96, 98, 101, 102, 103,
2807	52 (p/o), 56, 59, 62 (p/o)
2828	11, 13, 16, 17, 20, 22, 24
2829	1, 23, 24, 26, 45 (p/o)
2833	1, 28, 30, 35, 37, 38
2837	9 (p/o), 11, 18
2838	1 (p/o)
2839	1, 5, 10
2840	1, 5, 8 (p/o), 38 (p/o)
2841	1 (p/o), 5
2842	1, 6, 10, 13, 15, 18, 42, 47, 51, 55, 59 (p/o)
2843	1, 5, 12, 31, 35, 65, 69, 74 (p/o), 93 (p/o), 98
2844	1, 5, 9, 12, 116, 117
2845	34, 40, 45 (p/o), 55 (p/o)
2846	1, 2, 4, 6, 14, 21, 27, 32, 37 (p/o), 41 (p/o), 74 (p/o)
2847	1, 5, 8 (p/o), 29, 35, 36, 69 (p/o)
2848	1, 12, 16, 24
2849	1, 5, 9, 13, 24 (p/o)
2850	1, 3, 7, 9
2851	1 (p/o), 2 (p/o), 42
2852	1 (p/o), 4 (p/o), 9 (p/o), 14
2853	1 (p/o), 6 (p/o), 9 (p/o), 11, 12, 15, 17, 22, 27, 32, 41
2854	1, 3, 6, 8, 10, 14, 15, 18, 21, 24 (p/o), 26, 30, 36, 39, 42, 44 (p/o), 56, 62, 63, 64
2855	1, 8, 12, 15, 16, 20, 25, 27, 28
2856	1, 11, 19, 20, 23, 24, 29, 45, 49, 51, 53, 65, 141
2857	1, 6, 21, 22, 23, 24, 28, 43, 48, 51, 64, 71, 77, 81, 90, 94, 95
2858	1, 9, 15, 19, 23, 28
2859	1, 4, 5, 8, 10, 17, 18, 26, 30, 33, 34, 35, 38, 41, 44, 46, 50, 51, 77, 89, 92, 97
2860	1, 20, 34
2861	74, 79, 80, 163
2862	90, 97, 103
2863	1, 7, 16, 17 (p/o), 28 (p/o), 30, 32, 35, 40, 42, 46, 50, 54

2864	7, 35
2865	1, 15, 19, 23, 88
2868	139
2869	122, 127, 130, 136
2870	20, 26 (p/o), 31 (p/o), 35
2871	2, 61, 69, 78 (p/o), 85, 94, 106, 110, 112 (p/o), 115, 133, 140
2872	1, 40, 46, 50, 78, 82, 86, 92, 93
2873	1, 8, 10
2874	1, 3, 6, 8, 10, 58, 59, 154
3160	1
3169	1, 59, 66, 71
3171	17, 18, 19, 21, 23, 25, 26, 27, 59
3172	1, 3, 39, 40, 43, 44
3178	1 (p/o), 60
3179	1, 2, 4, 8, 13, 20, 30, 31, 63
3182	19 (p/o), 28, 31, 35
3183	1, 4, 74, 76
3185	1
3186	1, 10, 12, 17, 41, 44, 47, 48, 49, 55, 59, 63, 65, 67
3187	1, 3, 5, 7, 9, 14, 18, 25, 56
3192	1, 34, 37, 39, 42, 50, 55, 56, 60, 66, 75, 144
3193	1, 30 (p/o), 33
3195	40, 61 (p/o), 66, 69, 74, 83, 84, 90, 92
3196	36, 38, 53 (p/o), 55, 56, 58, 74, 77, 79, 81, 86, 91
3197	1, 14, 16, 17, 21, 29, 33, 35
3198	76, 77, 78, 81, 87, 88, 89, 90, 91, 102, 105, 148, 149, 150
3206	1, 5, 31
3208	35, 36, 39, 43, 45, 46 (p/o)
3209	1 (p/o), 14, 15, 16, 17, 79
3210	65

Appendix 2
Detailed RWCDs Tables

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2026 RWCDs No-Action and With-Action Land Uses

Land Use	No-Action Conditions	With-Action Condition	No-Action to With-Action Increment
Residential			
Total Residential	894,761 sf (780 DU)	4,103,185 sf (4,008 DU)	+ 3,208,424 sf (3,228 DU)
Commercial			
Local Retail	207,719 sf	443,916 sf	236,197 sf
FRESH Supermarket	28,405 sf	51,562 sf	23,157 sf
Restaurant	2,260 sf	13,891 sf	11,631 sf
Auto-Related	98,002 sf	0 sf	-98,002 sf
Office	4,818 sf	44,105 sf	39,287 sf
Warehouse	168,650 sf	0 sf	-168,650 sf
Garage	22,154 sf	0 sf	-22,154 sf
Other Commercial	600 sf	0 sf	-600 sf
Total Commercial	532,608 sf	553,474 sf	20,866 sf
Other Uses			
Industrial	47,795 sf	0 sf	-47,795 sf
Community Facility	82,919 sf ¹	155,192 sf ²	72,273 sf
Total Floor Area	1,558,083 sf	4,885,424 sf	3,353,768 sf
Parking			
Parking Spaces	945	1,162	217
Population³			
Residents	2,268	11,727	9,459
Workers	1,154	2,128	974

¹ Includes 36,120 sf of house of worship uses, 6,000 sf of medical office uses, 2,016 sf of day care center uses, 15,800 sf of Pre-K School uses and 22,983 sf of other community facility uses.

² Includes 53,896 sf of house of worship uses, 8,500 sf of medical office uses, 15,800 sf of Pre-K school uses, 23,099 of day care center uses and 53,896 sf of community center uses.

³ Assumes 2.87 persons per DU for residential units in Bronx Community District 7, 3.06 persons per DU for residential units in Bronx Community District 5 and 2.92 persons per DU for residential nits in Bronx Community District 4.

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY															
Site #	Site Info				Existing Conditions										
	Tax Block	Tax Lot	Lot Area (SF)	Existing Zoning	Existing Overlay	Built FAR	Maximum Res FAR	Maximum Comm FAR	Maximum Facility FAR	Comm SF+	Auto Rel.	Office (SF)	Total SF	Total DU's	
1	a	3198	81	12,800	C8-3		0.98	0	2	6.5	12,500	0	0	12,500	0
2	a	3187	9	12,500	C8-3		0.64	0	2	6.5	8,000	8,000	0	8,000	0
	b	3187	14	10,000	C8-3		0.1	0	2	6.5	1,000	1,000	0	1,000	0
3	a	3198	102	7,500	C8-3		1	0	2	6.5	7,500	4,950	0	7,500	0
	a	3198	105	12,500	C8-3		2	0	2	6.5	25,000	0	0	25,000	0
4	a	3186	59	6,800	C8-3		1	0	2	6.5	6,802	0	0	6,802	0
	b	3186	55	8,300	C8-3		1	0	2	6.5	8,300	0	0	8,300	0
5	a	3195	66	5,000	C8-3		1	0	2	6.5	5,000	5,000	0	5,000	0
	b	3195	69	10,000	C8-3		2	0	2	6.5	20,000	0	0	20,000	0
6	a	3186	10	5,000	C8-3		1	0	2	6.5	5,000	0	0	5,000	0
	b	3186	12	7,500	C8-3		1	0	2	6.5	7,500	0	0	7,500	0
	c	3186	1	12,202	C8-3		2	0	2	6.5	24,400	0	0	24,400	0
7	a	3185	1	12,988	C8-3		0.15	0	2	6.5	2,000	2,000	0	2,000	0
8	a	3192	42	9,688	C8-3		0.12	0	2	6.5	1,168	1,168	0	1,168	0
	b	3192	39	188	C8-3		0	0	2	6.5	0	0	0	0	0
	c	3192	37	3,422	C8-3		0	0	2	6.5	0	0	0	0	0
	d	3192	50	7,403	C8-3		0.36	0	2	6.5	2,700	2,700	0	2,700	0
9	a	3179	20	12,500	C8-3		2	0	2	6.5	25,000	0	0	25,000	0
10	a	2870	26	10,500	R7-1	C1-4	1.77	4	0	4.8	18,600	0	0	18,600	0
11	a	2863	42	10,000	R7-1	C2-4	0.6	4	0	4.8	6,000	0	6,000	6,000	0
12	a	3160	1	9,796	R8	C1-4	1	7.2	0	6.5	9,788	0	0	9,788	0
13	a	2863	50	10,834	R7-1	C2-4	0	4	0	4.8	0	0	0	0	0
14	a	2854	3	7,500	R7-1	C2-4	0.58	3.44	0	4.8	4,375	0	0	4,375	0
15	a	2862	97	15,039	C8-3		1.99	0	2	6.5	30,000	15,000	0	30,000	0
16	a	2853	22	10,369	C8-3		1.99	0	2	6.5	20,600	0	0	20,600	0
17	a	2853	27	9,631	R8	C1-4	1	7.2	0	6.5	9,631	0	0	9,631	0

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY															
Site #	Site Info				Existing Conditions										
	Tax Block	Tax Lot	Lot Area (SF)	Existing Zoning	Existing Overlay	Built FAR	Maximum Res FAR	Maximum Comm FAR	Maximum Facility FAR	Comm'l SF+	Auto Rel.	Office (SF)	Total SF	Total DU's	
18	a	2861	163	15,635	R7-1	C2-4	1.15	3.44	0	4.8	800	0	0	18,000	40
19	a	2850	7	5,000	R7-1	C2-4	0.9	4	0	4.8	4,500	0	0	4,500	0
	b	2850	3	9,000	R7-1	C2-4	2	4	0	4.8	18,000	0	0	18,000	0
	c	2850	1	5,000	R7-1	C2-4	1	4	0	4.8	5,000	0	0	5,000	0
20	c	2849	13	7,200	C8-3		0.08	0	2	6.5	600	0	0	600	0
	a	2849	9	10,002	C8-3		0.05	0	2	6.5	500	0	0	500	0
21	a	2859	33	3250	C8-3		0.85	0	2	6.5	0	0	0	2772	3
	b	2859	38	7500	C8-3		0.77	0	2	6.5	5800	5800	0	5800	0
	c	2859	35	6500	C8-3		0	0	2	6.5	0	0	0	0	0
	d	2859	41	2250	C8-3		1	0	2	6.5	2250	0	0	2250	0
	e	2859	34	3250	C8-3		0	0	2	6.5	3,250	3,250	0	3,250	0
22	a	2846	14	17,500	C8-3		0	0	2	6.5	0	0	0	0	0
	b	2846	6	15,000	C8-3		0.11	0	2	6.5	1,700	1,700	0	1,700	0
23	a	2865	88	11,057	C8-3		0.27	0	2	6.5	3,028	3,028	0	3,028	0
	b	2865	15	12,656	C8-3		2.05	0	2	6.5	26,000	0	0	26,000	0
24	b	2857	22	2,775	C8-3		0	0	2	6.5	0	0	0	0	0
	c	2857	21	2,750	C8-3		0	0	2	6.5	0	0	0	0	0
	e	2857	43	3,929	C8-3		0.89	0	2	6.5	3,500	3,500	0	3,500	0
25	a	2858	15	10,000	C8-3		1	0	2	6.5	10,000	10,000	0	10,000	0
	b	2858	19	10,000	C8-3		1	0	2	6.5	10,000	10,000	0	10,000	0
26	a	2844	9	9,723	C8-3		0.51	0	2	6.5	5,000	5,000	0	5,000	0
	b	2844	5	5,000	C8-3		1	0	2	6.5	5,000	2,500	0	5,000	0
	c	2844	117	260	R8		0	6.02	0	6.5	0	0	0	0	0
	d	2844	116	27	R8		0	6.02	0	6.5	0	0	0	0	0
27	a	2843	1	11,300	C4-4		1.44	3.44	3.4	6.5	16,235	0	0	16,235	0
28	a	2842	13	8,875	C4-4		1	3.44	3.4	6.5	8,841	0	0	8,841	0
	b	2842	15	4,171	C4-4		1.3	3.44	3.4	6.5	5,421	0	0	5,421	0
29	a	2843	98	8,842	C4-4		1.96	4	3.4	6.5	17,354	0	0	17,354	0
30	a	2857	6	8,669	C8-3		0	0	2	6.5	0	0	0	0	0
	b	2857	1	18,066	C8-3		0	0	2	6.5	0	0	0	0	0

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY

Site #	Site Info			Future Without-Action Conditions																
	Tax Block	Tax Lot	Lot Area (SF)		Residential SF	Total commercial SF	Total Restaurant SF	Supermarket (FRESH)	Retail SF	Auto-Related SF	Office SF	Storage SF	Garage SF	Industrial SF	TOTAL C Fac SF	Total SF	NO ACTION Total DU's	Total Parking	Bldg Height	
1	a	3198	81	12,800	Retail	0	12,500	0	0	12,500	0	0	0	0	0	0	12,500	0	13	10
2	a	3187	9	12,500	Transportation and Utility	0	9,000	0	0	0	9,000	0	0	0	0	0	9,000	0	9	10
	b	3187	14	10,000	Transportation and Utility															
3	a	3198	102	7,500	Auto-Related Commercial	0	32,500	0	0	27,550	4,950	0	0	0	0	0	32,500	0	33	23
	a	3198	105	12,500	Retail, Entertainment															26
4	a	3186	59	6,800	Retail	0	15,102	1,360	8,980	4,761	0	0	0	0	0	0	15,102	0	17	15
	b	3186	55	8,300	Retail															10
5	a	3195	66	5,000	Auto-Related Commercial	0	25,000	0	0	0	5,000	0	20,000	0	0	0	25,000	0	25	10
	b	3195	69	10,000	Storage															20
6	a	3186	10	5,000	Vacant	0	36,900	0	0	0	0	0	36,900	0	0	0	36,900	0	37	18
	b	3186	12	7,500	Parking Facilities															10
	c	3186	1	12,202	Commercial															25
7	a	3185	1	12,988	Auto-Related Commercial	0	2,000	0	0	0	2,000	0	0	0	0	0	2,000	0	2	10
8	a	3192	42	9,688	Surface Parking	0	3,868	0	0	0	3,868	0	0	0	0	0	3,868	0	4	10
	b	3192	39	188	Surface Parking															0
	c	3192	37	3,422	Surface Parking															0
	d	3192	50	7,403	Auto-Related Commercial															10
9	a	3179	20	12,500	Industrial and Manufacturing Building	0	25,000	0	0	0	0	25,000	0	0	0	0	25,000	0	25	31
10	a	2870	26	10,500	Supermarket, residential	22,575	19,425	0	19,425	0	0	0	0	0	0	0	42,000	23	53	75
11	a	2863	42	10,000	Community Facility	0	6,000	0	0	0	0	0	0	0	6,000	6,000	0	12	10	
12	a	3160	1	9,796	Retail	0	9,788	0	0	9,788	0	0	0	0	0	0	9,788	0	0	10
13	a	2863	50	10,834	Retail, Residential	36,836	6,500	0	0	6,500	0	0	0	0	0	0	43,336	37	29	85
14	a	2854	3	7,500	Commercial	0	4,375	0	0	4,375	0	0	0	0	0	0	4,375	0	0	15
15	a	2862	97	15,039	Auto-Related Commercial, Parking Facilities	0	30,000	0	0	0	15,000	0	15,000	0	0	0	30,000	0	30	20
16	a	2853	22	10,369	Retail, Industrial and Manufacturing Building	0	20,600	0	0	12,305	0	0	0	8,295	0	0	20,600	0	0	25
17	a	2853	27	9,631	Retail, Residential	59,712	9,631	0	0	9,631	0	0	0	0	0	0	69,343	60	0	115

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY																			
Site #	Site Info			Future Without-Action Conditions															
	Tax Block	Tax Lot	Lot Area (SF)	Residential SF	Total commercial SF	Total Restaurant SF	Supermarket (FRESH)	Retail SF	Auto-Related SF	Office SF	Storage SF	Garage SF	Industrial SF	TOTAL C Fac SF	Total SF	NO ACTION Total DU's	Total Parking	Bldg Height	
31	a	2520	45	7,525	House of Worship	0	36,120	0	0	0	0	0	0	0	36,120	72,240	0	36	85
32	a	2871	85	25,654	Auto-Related Commercial, Surface Parking														10
	b	2871	106	417	Vacant	0	27,983	0	0	0	5,000	0	0	0	22,983	27,983	0	28	0
	c	2871	115	15	Vacant														0
	d	2871	94	7,686	Community Facility														30
33	a	2871	112	5,005	Auto-Related Commercial	0	9,814	0	0	1,203	5,000	0	0	3,611	0	9,814	0	10	10
	b	2871	110	5,894	Auto-Related Commercial														
34	a	2856	11	22,885	Warehouse, Self-storage	0	56,250	0	0	0	0	56,250	0	0	0	56,250	0	56	38
35	a	2856	1	21,544	Manufacturing	0	21,500	0	0	0	0	0	21,500	0	21,500	0	22	20	
36	a	2871	61	14,543	Parking Facilities														0
	b	2871	133	1,365	vacant	0	5,059	0	0	0	0	3,043	0	2,016	5,059	0	7	0	
	c	2871	140	6,973	Parking Facilities, Community Facility														24
37	a	2506	98	5,013	Residential	2,856	0	0	0	0	0	0	0	0	2,856	3	0	40	
38	a	2506	100	5,001	Residential	12,953	0	0	0	0	0	0	0	0	12,953	13	0	85	
39	a	2506	40	17,635	Parking Facility	0	0	0	0	0	0	0	0	0	0	0	0	23	0
40	a	2489	6	3,931	Commercial	0	16,857	0	0	8,633	3,406	4,818	0	0	16,857	0	0	25	
	b	2489	8	10,045	Retail, Office													15	
41	a	2496	64	27,000	Retail, Residential	139,590	22,950	0	0	22,950	0	0	0	0	162,540	140	79	125	
42	a	2488	14	21,425	Retail, Residential	110,767	18,211	0	0	18,211	0	0	0	0	128,979	111	63	125	
43	a	2488	12	17,250	Vacant	0	15,000	0	0	0	0	0	0	15,000	15,000	0	0	15	
44	a	2488	1	14,835	Retail, Residential	76,697	12,610	0	0	12,610	0	0	0	0	89,307	77	28	125	
45	a	2487	38	17,272	Residential														
	b	2487	32	25,650	Residential	412,803	0	0	0	0	0	0	0	0	412,803	273	185	125	
	c	2487	30	25,650	Residential														
TOTAL						894,761	663,322	2,260	28,405	207,719	98,002	4,818	168,650	22,154	47,795	82,919	1,594,204	780	945

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY

Site #	Site Info			Future With-Action Conditions																
	Tax Block	Tax Lot	Lot Area (SF)	Prop. Zoning	Prop. Max. Residential FAR	Proposed Max Commercial FAR	Proposed Max C. Facility FAR	Prop. Overlay		Total Residential SF	Total Restaurant SF	Total Supermarket (FRESH)	Total Retail	Total Office SF	TOTAL C Fac SF	Total SF	WITH ACTION Total DU's	Total parking	Max Bldg Height	
1	a	3198	81	12,800	R7A	4.6	2	4.6	C2-4	House of Worship, Community Center	0	0	0	0	0	58,880	58,880	0	59	115
2	a	3187	9	12,500	R7A	4.6	2	4.6	C2-4	Ground Floor Retail (1), Residential	91,875	0	0	11,625	0	103,500	92	12	115	
	b	3187	14	10,000	R7A	4.6	2	4.6	C2-4											
3	a	3198	102	7,500	R7A	4.6	2	4.6	C2-4	GF Restaurant, Fresh(1), Residential	75,000	6,375	10,625	0	0	92,000	75	6	115	
	a	3198	105	12,500	R7A	4.6	2	4.6	C2-4											
4	a	3186	59	6,800	R7A	4.6	2	4.6	C2-4	Retail, DayCare (1), Residential	55,380	0	0	5,780	0	8,300	69,460	56	35	115
	b	3186	55	8,300	R7A	4.6	2	4.6	C2-4											
5	a	3195	66	5,000	R7A	4.6	2	4.6	C2-4	Retail (1), Residential	56,250	0	0	12,750	0	69,000	57	34	115	
	b	3195	69	10,000	R7A	4.6	2	4.6	C2-4											
6	a	3186	10	5,000	R7A	4.6	2	4.6	C2-4	Retail (2), Residential	92,633	0	0	20,997	0	113,629	93	20	115	
	b	3186	12	7,500	R7A	4.6	2	4.6	C2-4											
	c	3186	1	12,202	R7A	4.6	2	4.6	C2-4											
7	a	3185	1	12,988	R7A	4.6	2	4.6	C2-4	Retail (1), Residential	48,705	0	0	11,040	0	0	59,745	49	11	115
8	a	3192	42	9,688	R7A	4.6	2	4.6	C2-4	Retail (1), Residential	77,629	0	0	17,596	0	0	95,225	78	37	115
	b	3192	39	188	R7A	4.6	2	4.6	C2-4											
	c	3192	37	3,422	R7A	4.6	2	4.6	C2-4											
	d	3192	50	7,403	R7A	4.6	2	4.6	C2-4											
9	a	3179	20	12,500	R7A	4.6	2	4.6	C2-4	Retail (1), Residential	46,875	0	0	10,625	0	0	57,500	47	11	115
10	a	2870	26	10,500	C4 4D	7.2	3.4	6.5		Anchor Retail (2), residential	56,175	0	0	19,425	0	0	75,600	56	19	145
11	a	2863	42	10,000	C4 4D	7.2	3.4	6.5		Medical Office (1), Residential	63,500	0	0	0	0	8,500	72,000	64	9	165
12	a	3160	1	9,796	C4 4D	7.2	3.4	6.5		Retail (1), Office	0	0	0	8,327	24,980	0	33,306	0	33	145
13	a	2863	50	10,834	C4 4D	7.2	3.4	6.5		Anchor Retail (2), Residential	57,962	0	0	20,043	0	0	78,005	58	20	165
14	a	2854	3	7,500	C4 4D	7.2	3.4	6.5		Retail (1), Office	0	0	0	6,375	19,125	0	25,500	0	26	165
15	a	2862	97	15,039	C4 4D	7.2	3.4	6.5		Day Care (1), Residential	95,498	0	0	0	0	12,783	108,281	95	32	165
16	a	2853	22	10,369	C4 4D	7.2	3.4	6.5		Retail (1), Residential	65,843	0	0	8,814	0	0	74,657	66	9	165
17	a	2853	27	9,631	C4 4D	7.2	3.4	6.5		GF Fresh (2), residential	51,526	0	17,817	0	0	0	69,343	60	0	145

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY

Site #	Site Info			Future With-Action Conditions																
	Tax Block	Tax Lot	Lot Area (SF)	Prop. Zoning	Prop. Max. Residential FAR	Proposed Max Commercial FAR	Proposed Max C. Facility FAR	Prop. Overlay		Total Residential SF	Total Restaurant SF	Total Supermarket (FRESH)	Total Retail	Total Office SF	TOTAL C Fac SF	Total SF	WITH ACTION Total DU's	Total parking	Max Bldg Height	
18	a	2861	163	15,635	R8A	7.2	2	4.2	C2-4	Retail (1), Residential	99,282	0	0	12,490	0	800	112,572	99	32	165
19	a	2850	7	5,000	R8A	7.2	2	4.2	C2-4	Retail (2), Residential	120,650	0	0	16,150	0	0	136,800	121	40	165
	b	2850	3	9,000	R8A	7.2	2	4.2	C2-4											
	c	2850	1	5,000	R8A	7.2	2	4.2	C2-4											
20	c	2849	13	7,200	R7A	4.6	2	4.6	C2-4	Retail (1), Residential	64,508	0	6,120	8,502	0	0	79,129	65	15	115
	a	2849	9	10,002	R7A	4.6	2	4.6	C2-4											
21	a	2859	33	3250	R7A	4.6	0	4.6		Residential	81,900	0	0	0	0	0	81,900	82	31	95
	b	2859	38	7500	R7A	4.6	0	4.6												
	c	2859	35	6500	R7A	4.6	0	4.6												
	d	2859	41	2250	R7A	4.6	0	4.6												
	e	2859	34	3250	R7A	4.6	0	4.6												
22	a	2846	14	17,500	R7A	4.6	2	4.6	C2-4	Retail (2), Residential	121,875	0	0	27,625	0	0	149,500	122	74	115
	b	2846	6	15,000	R7A	4.6	2	4.6	C2-4											
23	a	2865	88	11,057	R8A	7.2	0	6.5		Residential	147,021	0	0	0	0	0	147,021	147	0	95
	b	2865	15	12,656	R8A	7.2	0	6.5												
24	b	2857	22	2,775	R8A	7.2	0	6.5		Residential	58,615	0	0	0	0	0	58,615	58	0	165
	c	2857	21	2,750	R8A	7.2	0	6.5												
	e	2857	43	3,929	R8A	7.2	0	6.5												
25	a	2858	15	10,000	R8A	7.2	2	6.5	C2-4	FRESH (1), residential	127,000	0	17,000	0	0	0	144,000	128	0	165
	b	2858	19	10,000	R8A	7.2	2	6.5	C2-4											
26	a	2844	9	9,723	R7A	4.6	2	4.6	C2-4	Retail (1), Residential	56,288	0	0	12,759	0	0	69,046	56	12	115
	b	2844	5	5,000	R7A	4.6	2	4.6	C2-4											
	c	2844	117	260	R7A	Lot Area included in 2844-5														
	d	2844	116	27	R7A															
27	a	2843	1	11,300	R8A	7.2	2	6.5	C2-4	Retail (1), Residential	71,755	0	0	9,605	0	0	81,360	72	10	165
28	a	2842	13	8,875	R8A	7.2	2	6.5	C2-4	Retail (1), Residential	82,842	0	0	11,089	0	0	93,931	83	24	145
	b	2842	15	4,171	R8A	7.2	2	6.5	C2-4											
29	a	2843	98	8,842	R8A	7.2	2	6.5	C2-4	Restaurant (1), Residential	56,147	7,516	0	0	0	0	63,662	56	8	145
30	a	2857	6	8,669	R8A	7.2	2	6.5	C2-4	Retail (1), Residential	169,767	0	0	22,725	0	0	192,492	170	22	145
	b	2857	1	18,066	R8A	7.2	2	6.5	C2-4											

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY

Site #	Site Info			Future With-Action Conditions							Total Residential SF	Total Restaurant SF	Total Supermarket (FRESH)	Total Retail	Total Office SF	TOTAL C Fac SF	Total SF	WITH ACTION Total DU'S	Total parking	Max Bldg Height
	Tax Block	Tax Lot	Lot Area (SF)	Prop. Zoning	Prop. Max. Residential FAR	Proposed Max Commercial FAR	Proposed Max C. Facility FAR	Prop. Overlay												
31	a	2520	45	7,525	R8A	7.2	2	6.5	C1-4	House of Worship / Community Center	0	0	0	0	0	48,913	48,913	0	49	145
32	a	2871	85	25,654	R9A	8.5	2	7.5	C2-4	Retail (1), Residential	258,356	0	0	28,706	0	0	287,063	258	106	225
	b	2871	106	417	R9A	8.5	2	7.5	C2-4											
	c	2871	115	15	R9A	8.5	2	7.5	C2-4											
	d	2871	94	7,686	R9A	8.5	2	7.5	C2-4											
33	a	2871	112	5,005	R9A	8.5	0	7.5		Residential	81,743	0	0	0	0	0	81,743	82	0	175
	b	2871	110	5,894	R9A	8.5	0	7.5												
34	a	2856	11	22,885	R8A	7.2	0	6.5		Residential	141,887	0	0	0	0	0	141,887	142	0	145
35	a	2856	1	21,544	R8A	7.2	0	6.5		Residential	133,573	0	0	0	0	0	133,573	134	27	145
36	a	2871	61	14,543	R9A	8.5	2	7.5	C2-4	Day Care, Retail (1), Residential	175,040	0	0	17,433	0	2,016	194,490	174	19	175
	b	2871	133	1,365	R9A	8.5	2	7.5	C2-4											
	c	2871	140	6,973	R9A	8.5	2	7.5	C2-4											
37	a	2506	98	5,013	R8/C2-2	6	2	6.5	C2-4	Retail (1), Small Residential	2,856	0	0	4,261	0	0	7,117	3	4	175
38	a	2506	100	5,001	R8/C2-2	6	2	6.5	C2-4	Retail (1), Residential	12,953	0	0	4,251	0	0	17,204	13	4	175
39	a	2506	40	17,635	R9A	8.5	2	7.5	C2-4	Retail (1), Residential	134,908	0	0	14,990	0	0	149,898	135	15	175
40	a	2489	6	3,931	R9A	8.5	2	7.5	C2-4	Retail (1), Residential	106,916	0	0	11,880	0	0	118,796	107	28	225
	b	2489	8	10,045	R9A	8.5	2	7.5	C2-4											
41	a	2496	64	27,000	R9A	8.5	2	7.5	C2-4	Retail (1), Residential	206,550	0	0	22,950	0	0	229,500	207	85	195
42	a	2488	14	21,425	R9A	8.5	2	7.5	C2-4	Retail (1), Residential	163,901	0	0	18,211	0	0	182,113	164	67	195
43	a	2488	12	17,250	R9A	8.5	2	7.5	C2-4	Pre K School (1)	0	0	0	0	0	15,000	15,000	0	15	15
44	a	2488	1	14,835	R9A	8.5	2	7.5	C2-4	Retail (2), Residential	113,488	0	0	12,610	0	0	126,098	113	13	195
45	a	2487	38	17,272	R8	6.02	2	6.5	C2-4	Retail (1), Residential	378,517	0	0	34,286	0	0	412,803	273	90	205
	b	2487	32	25,650	R8	6.02	2	6.5	C2-4											
	c	2487	30	25,650	R8	6.02	2	6.5	C2-4											
TOTAL											4,103,186	13,891	51,562	443,917	44,105	155,192	4,811,856	4,008	1,162	

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY

Site #	Site Info				Increment																					
	Tax Block	Tax Lot	Lot Area (SF)	Residential SF	Total Commercial SF (includes CF)	Comm (retail, restaurant, grocery, auto)	Retail	Supermarket FRESH SF	Restaurant SF	Auto-Related SF	Hotel SF	Office SF	Storage SF	Garage SF	Other Comm SF	Industrial SF	Medical Office	House of Worship	Day Care Center	Pre-K School	Community Center	C Fac SF	Total SF	Total DU's	Total Prking	
18	a	2861	163	15,635	82,082	12,490	12,490	12,490	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	94,572	59	32
19	a	2850	7	5,000	120,650	(11,350)	11,150	11,150	0	0	0	0	(4,500)	0	0	(18,000)	0	0	0	0	0	0	0	109,300	121	13
	b	2850	3	9,000																						
	c	2850	1	5,000																						
20	c	2849	13	7,200	64,508	13,522	14,622	8,502	6,120	0	0	0	0	(500)	(600)	0	0	0	0	0	0	0	0	78,029	65	9
	a	2849	9	10,002																						
21	a	2859	33	3250	79,128	(11,300)	(11,300)	(1,350)	0	(900)	(9,050)	0	0	0	0	0	0	0	0	0	0	0	0	67,828	79	25
	b	2859	38	7500																						
	c	2859	35	6500																						
	d	2859	41	2250																						
	e	2859	34	3250																						
22	a	2846	14	17,500	121,875	25,925	25,925	27,625	0	0	(1,700)	0	0	0	0	0	0	0	0	0	0	0	0	147,800	122	72
	b	2846	6	15,000																						
23	a	2865	88	11,057	147,021	(29,028)	(3,028)	0	0	0	(3,028)	0	0	(26,000)	0	0	0	0	0	0	0	0	0	117,993	147	(29)
	b	2865	15	12,656																						
24	b	2857	22	2,775	58,615	(3,500)	(3,500)	0	0	0	(3,500)	0	0	0	0	0	0	0	0	0	0	0	0	55,115	58	(4)
	c	2857	21	2,750																						
	e	2857	43	3,929																						
25	a	2858	15	10,000	127,000	(3,000)	(3,000)	0	17,000	0	(20,000)	0	0	0	0	0	0	0	0	0	0	0	0	124,000	128	(20)
	b	2858	19	10,000																						
26	a	2844	9	9,723	56,288	2,759	2,759	10,259	0	0	(7,500)	0	0	0	0	0	0	0	0	0	0	0	0	59,046	56	2
	b	2844	5	5,000																						
	c	2844	117	260																						
	d	2844	116	27																						
27	a	2843	1	11,300	71,755	(6,630)	(6,630)	(6,630)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	65,125	72	10
28	a	2842	13	8,875	82,842	(3,173)	(3,173)	(3,173)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	79,669	83	24
	b	2842	15	4,171																						
29	a	2843	98	8,842	56,147	(9,838)	(9,838)	(17,354)	0	7,516	0	0	0	0	0	0	0	0	0	0	0	0	0	46,308	56	(9)
30	a	2857	6	8,669	169,767	22,725	22,725	22,725	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	192,492	170	22
	b	2857	1	18,066																						

TABLE 1: PROJECTED DEVELOPMENT SITE SUMMARY

Site #	Site Info			Increment																						
	Tax Block	Tax Lot	Lot Area (SF)	Residential SF	Total Commercial SF (Includes CF)	Comm (retail, restaurant, grocery, auto)	Retail	Supermarket FRESH SF SF	Restaurant SF	Auto-Related SF	Hotel SF	Office SF	Storage SF	Garage SF	Other Comm SF	Industrial SF	Medical Office	House of Worship	Day Care Center	Pre-K School	Community Center	C Fac SF	Total SF	Total DU's	Total Prking	
31	a	2520	45	7,525	0	12,793	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24,456	12,793	(23,328)	0	13
32	a	2871	85	25,654	258,356	723	23,706	28,706	0	0	(5,000)	0	0	0	0	0	0	0	0	0	0	0	(22,983)	259,080	258	78
	b	2871	106	417																						
	c	2871	115	15																						
	d	2871	94	7,686																						
33	a	2871	112	5,005	81,743	(9,814)	(6,203)	(1,203)	0	0	(5,000)	0	0	(3,611)	0	0	0	0	0	0	0	0	0	71,929	82	(10)
	b	2871	110	5,894																						
34	a	2856	11	22,885	141,887	(56,250)	0	0	0	0	0	0	(56,250)	0	0	0	0	0	0	0	0	0	0	85,637	142	(56)
35	a	2856	1	21,544	133,573	(21,500)	0	0	0	0	0	0	0	0	0	(21,500)	0	0	0	0	0	0	0	112,073	134	5
36	a	2871	61	14,543	175,040	14,390	17,433	17,433	0	0	0	0	0	(3,043)	0	0	0	0	0	0	0	0	0	189,431	174	12
	b	2871	133	1,365																						
	c	2871	140	6,973																						
37	a	2506	98	5,013	0	4,261	4,261	4,261	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,261	0	4
38	a	2506	100	5,001	0	4,251	4,251	4,251	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,251	0	4
39	a	2506	40	17,635	134,908	14,990	14,990	14,990	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	149,898	135	(8)
40	a	2489	6	3,931	106,916	(4,977)	(159)	3,247	0	0	(3,406)	0	(4,818)	0	0	0	0	0	0	0	0	0	0	101,939	107	28
	b	2489	8	10,045																						
41	a	2496	64	27,000	66,960	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	66,960	67	6	
42	a	2488	14	21,425	53,134	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	53,134	53	5
43	a	2488	12	17,250	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15
44	a	2488	1	14,835	36,791	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	36,791	36	(15)
45	a	2487	38	17,272	(34,286)	34,286	34,286	34,286	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(96)
	b	2487	32	25,650																						
	c	2487	30	25,650																						
TOTAL					3,208,424	45,344	172,983	236,198	23,157	11,630	(98,002)	0	39,287	(168,650)	(22,154)	(600)	(47,795)	2,500	17,776	21,083	0	53,896	72,273	3,217,651	3,228	214

Appendix 3

Transportation Planning Factors and Travel Demand Forecast Memorandum

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To: NYCDP
From: STV Incorporated
Date: August 29, 2016
Project: Jerome Avenue Rezoning EIS
Reference: Transportation Planning Factors and Travel Demand Forecast

This memorandum summarizes the transportation planning factors to be considered for analyses of traffic, parking, transit, and pedestrian conditions for the *Jerome Avenue Rezoning EIS*. Estimates of the peak travel demand for the Proposed Actions' reasonable worst-case development scenario (RWCDs) are provided, along with a discussion of trip assignment methodologies and study area definitions.

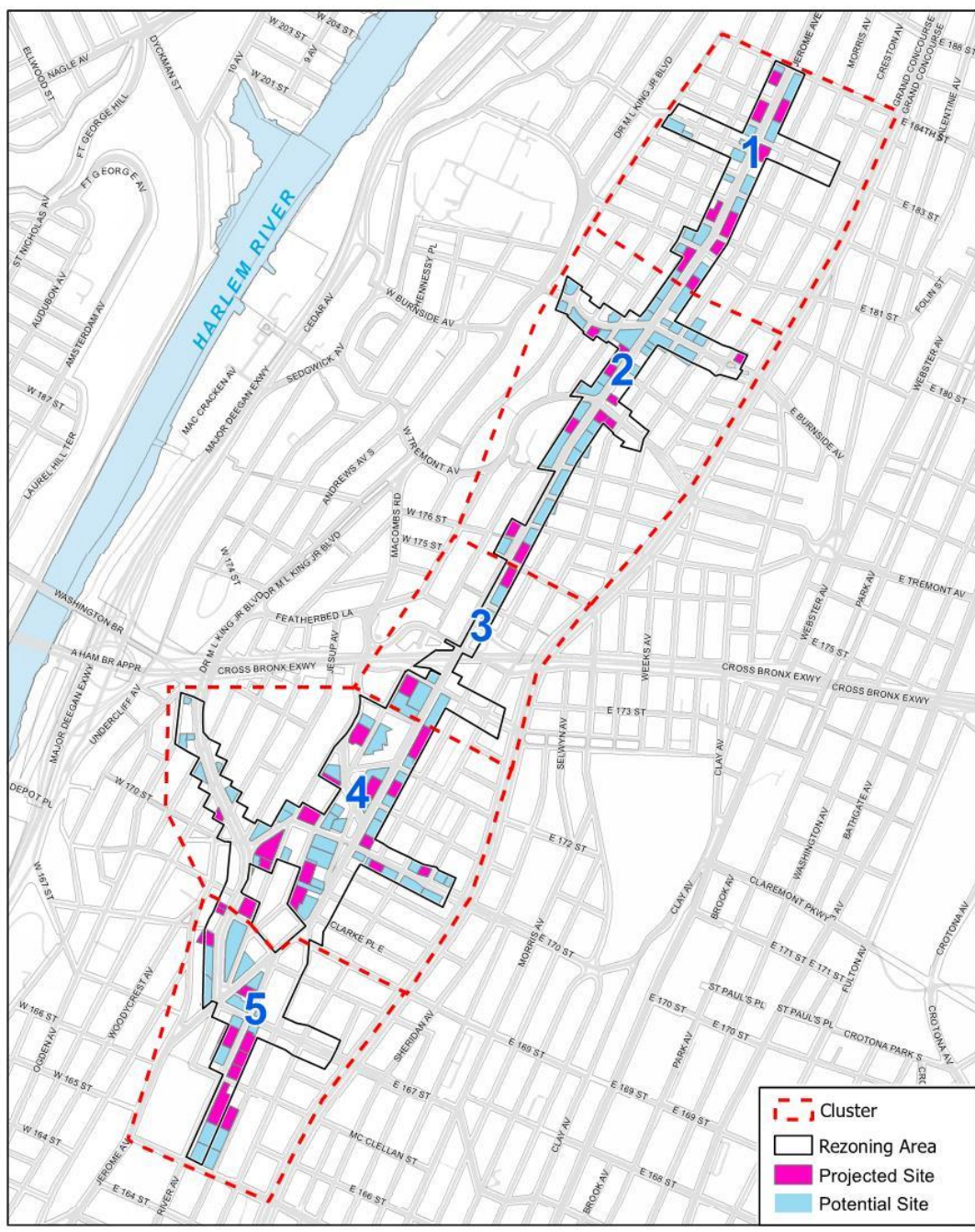
PROPOSED ACTIONS

The Proposed Actions include zoning map amendments and zoning text amendments affecting approximately 73 blocks in the Bronx. The rezoning area includes portions of the University Heights, Fordham, Morris Heights, Mount Hope, Mount Eden, and Highbridge neighborhoods in Community Districts 4, 5, and 7, along an approximately two-mile street of Jerome Avenue between Fordham Road to the north and Mullaly Park to the south (see **Figure 1**). The rezoning area is currently zoned with a mix of residential, commercial, and light manufacturing zoning districts.

THE REASONABLE WORST CASE DEVELOPMENT SCENARIO (RWCDs)

A RWCDs for both "future without the proposed actions" (No-Action) and "future with the proposed actions" (With-Action) conditions is analyzed for an analysis year of 2026 in order to assess the potential effects of the Proposed Actions. Likely development sites were identified and divided into two categories: projected development sites and potential development sites to develop a reasonable estimate of future growth. The projected development sites are those considered more likely to be developed within the ten-year analysis period for the Proposed Actions (i.e., by the 2026 analysis year), while potential sites are considered less likely to be developed over the same period. Only projected development sites are considered for the purposes of the transportation analyses. **Table 1** lists the total anticipated No-Action and With-Action land uses on projected development sites in 2026 under the RWCDs.

Overall, the rezoning area encompasses approximately 73 blocks and includes a total of 45 projected development sites (see **Figure 1**). The projected development sites were grouped into a total of five "clusters" for travel demand forecasting and trip assignment purposes. These clusters were defined based on the rezoning area roadway network characteristics and the likely travel routes of vehicle trips to and from the development sites. The location of each cluster is shown on **Figure 1**, and the projected development sites included in each cluster are listed in **Table 2**.



N
 0 0.25 0.5 Miles
Jerome Avenue Rezoning Proposal

Figure 1
TRAFFIC STUDY AREAS

Table 1: 2026 RWCDs No-Action and With-Action Land Uses

Land Use	No-Action Condition	With-Action Condition	No-Action to With-Action Increment
Residential			
Total Residential	894,761 sf (780 DU)	4,162,049 sf (4,030 DU)	+ 3,267,288 sf (+ 3,250 DU)
Commercial			
Local Retail	207,719 sf	415,799 sf	+ 208,080 sf
Regional Retail	0 sf	42,826 sf	+ 42,826 sf
FRESH Supermarket	28,405 sf	51,562 sf	+ 23,157 sf
Restaurant	2,260 sf	13,891 sf	+ 11,631 sf
Auto Repair	86,784 sf	0 sf	- 86,784 sf
Auto Dealership	11,218 sf	0 sf	- 11,218 sf
Office	4,818 sf	44,105 sf	+ 39,287 sf
Warehouse	168,650 sf	0 sf	- 168,650 sf
Garage	22,154 sf	0 sf	- 22,154 sf
Gas Station	600 sf	0 sf	- 600 sf
Total Commercial	532,608 sf	568,183 sf	+ 35,575 sf
Community Facility			
Medical Office	6,000 sf	8,500 sf	+ 2,500 sf
House of Worship	36,120 sf	53,896 sf	+ 17,776 sf
Day Care Center	2,016 sf	23,099 sf	+ 21,083 sf
Pre-K School	15,800 sf	15,800 sf	0 sf
Community Center	0 sf	53,896 sf	+ 53,896 sf
Transitional Housing	22,983 sf	0 sf	-22,983 sf
Total Community Facility	82,919 sf	155,191 sf	+ 72,272 sf
Other Uses			
Light Industrial	47,795 sf	0 sf	- 47,795 sf
Total Floor Area	1,558,083 sf	4,885,423 sf	+3,327,340 sf
Parking			
Parking Spaces	99	0	-99

Table 2: Transportation Analysis Development Clusters

Cluster	Projected Development Sites
1	1-9
2	10-19
3	20-21
4	22-36
5	37-45

PRELIMINARY TRANSPORTATION PLANNING FACTORS

The transportation planning factors proposed for use in forecasting travel demand for the Proposed Actions (expressed as land uses) are summarized in **Table 3** and discussed below¹. The trip generation rates, temporal distributions, modal splits, vehicle occupancies, and truck trip factors for each of the land uses were based on those cited in the 2014 *CEQR Technical Manual*, factors developed for recent environmental reviews, 2010-2014 American Community Survey (“ACS”) journey-to-work data, and American Association of State Highway and Transportation Officials Census Transportation Planning Products (AASHTO CTPP) data. Factors are shown for the weekday AM and PM peak hours (typical peak periods for commuter travel demand) and the weekday and Saturday midday peak hours (typical peak periods for retail demand).

Residential

The residential travel demand forecasts are based on person trip and truck trip generation rates and temporal distributions cited in the *CEQR Technical Manual* and approved for use. The directional in/out splits are based on data from the *Webster Avenue Rezoning EIS*, which relates to a nearby rezoning.

It is noted that ACS vehicle occupancy data reflect the average vehicle occupancy for personal auto trips to and from work, and therefore do not present the complete picture of average vehicle occupancy for other purposes (e.g., shopping, errands, social and recreational activities, school trips, etc.). In general, vehicle occupancy rates for non-work-related trips have been found to be higher than vehicle occupancy rates for work-related trips. As documented in the *East New York Rezoning EIS*, both national data from USDOT-FHWA's *Summary of Travel Trends: 2009 National Household Travel Survey* and regional data from the *Regional Travel-Household Interview Survey* prepared for the New York Metropolitan Transportation Council and the North Jersey Transportation Planning Authority indicate that average vehicle occupancy rates for all auto trips are more than 1.4 times the average vehicle occupancy rates for auto trips to and from work. As such, the weekday AM/PM peak hour vehicle occupancy rates derived from the ACS data are adjusted by a multiplicative factor of 1.4 for the weekday midday peak hour to reflect the predominance of non-work-related trips during these periods. While not all AM and PM peak hour trips are work-related, the lower vehicle occupancy rates for trips to and from work are conservatively applied to all auto trips in these peak travel hours.

¹ The No-Action garage floor area is an accessory to other uses and is not expected to generate additional vehicle trips independent of these uses. It is, therefore, not reflected in the travel demand forecast as an independent use.

Table 3: Transportation Planning Factors

Land Use	Local Retail		Regional Retail		Office		Residential		Restaurant (sit-down)		Light Industrial		Auto Repair		Auto Dealership		Warehouse	
Size/Units	gsf		gsf		gsf		DU		gsf		gsf		gsf		gsf		gsf	
Trip Generation	(1)		(1)		(1)		(1)		(17)		(10, 11)		(2)		(18)		(19)	
Weekday	205		78.2		18		8.075		173		11.5		19.42		45.6		4.9	
Saturday	740		92.5		3.9		9.6		181		1.7		19.42		78.8		1.7	
	per 1,000 sf		per 1,000 sf		per 1,000 sf		per DU		per 1,000 sf		per 1,000 sf		per 1,000 sf		per 1,000 sf		per 1,000 sf	
Temporal Distribution	(1)		(1)		(1)		(1)		(17)		(10, 12)		(2)		(7, 18)		(9, 19)	
AM	3.0%		3.0%		12.0%		10.0%		0.9%		13.0%		13.2%		6.1%		8.4%	
MD	19.0%		9.0%		15.0%		5.0%		6.2%		10.0%		11.0%		12.0%		14.0%	
PM	10.0%		9.0%		14.0%		11.0%		8.3%		14.0%		14.2%		7.8%		8.9%	
Sat MD	10.0%		11.0%		17.0%		8.0%		11.0%		10.0%		11.0%		14.1%		10.6%	
Modal Splits	(2)		(4)		(4)		(5)		(17)		(4)		(2)		(7)		(4)	
Auto	3.0%		37.0%		37.0%		19.3%		25.0%		37.0%		85.0%		100.0%		37.0%	
Taxi	2.0%		2.0%		2.0%		1.8%		2.0%		2.0%		5.0%		0.0%		2.0%	
Bus	10.0%		21.0%		21.0%		15.4%		5.0%		21.0%		1.0%		0.0%		21.0%	
Subway	5.0%		21.0%		21.0%		49.2%		30.0%		21.0%		1.0%		0.0%		21.0%	
Railroad	0.0%		1.0%		1.0%		2.9%		0.0%		1.0%		0.0%		0.0%		1.0%	
Walk/Other	80.0%		18.0%		18.0%		11.4%		20.0%		18.0%		8.0%		0.0%		18.0%	
In/Out Splits	(2)		(3)		(2)		(2)		(2, 17)		(10, 12)		(2)		(7, 18)		(9, 19)	
AM	In 50%	Out 50%	In 52%	Out 48%	In 96%	Out 4%	In 15%	Out 85%	In 94%	Out 6%	In 88%	Out 12%	In 65%	Out 35%	In 74%	Out 26%	In 79%	Out 21%
MD	In 50%	Out 50%	In 52%	Out 48%	In 39%	Out 61%	In 50%	Out 50%	In 50%	Out 50%	In 50%	Out 50%	In 50%	Out 50%	In 50%	Out 50%	In 50%	Out 50%
PM	In 50%	Out 50%	In 52%	Out 48%	In 5%	Out 95%	In 70%	Out 30%	In 67%	Out 33%	In 17%	Out 83%	In 50%	Out 50%	In 39%	Out 61%	In 25%	Out 75%
Sat MD	In 50%	Out 50%	In 52%	Out 48%	In 60%	Out 40%	In 50%	Out 50%	In 50%	Out 50%	In 50%	Out 50%	In 50%	Out 50%	In 51%	Out 49%	In 64%	Out 36%
Vehicle Occupancy	(2)		(3)		(2, 4)		(2, 5, 6)		(17)		(10)		(2)		(7)		(9, 19)	
Auto	1.60		2.20		1.13		1.21		1.69		2.20		1.30		1.30		1.30	
Taxi	1.20		2.00		1.40		1.4		1.4		2.30		1.40		1.30		2.00	
Truck Trip Generation	(1)		(3)		(1)		(1)		(17)		(10, 13)		(2)		(7)		(9)	
Weekday	0.35		0.35		0.32		0.06		3.60		0.52		0.89		0.15		0.67	
Saturday	0.04		0.35		0.01		0.02		3.60		0.03		0.05		0.15		0.03	
Temporal Distribution	(1)		(3)		(1)		(1)		(2, 17)		(10, 12)		(2)		(7)		(9)	
AM	8.0%		8.0%		10.0%		12.0%		6.0%		12.0%		14.0%		9.6%		14.0%	
MD	11.0%		11.0%		11.0%		9.0%		6.0%		9.0%		9.0%		11.0%		9.0%	
PM	2.0%		2.0%		2.0%		2.0%		1.0%		2.0%		1.0%		1.0%		1.0%	
Saturday	11.0%		11.0%		11.0%		9.0%		6.0%		9.0%		9.0%		11.0%		9.0%	
In/Out Splits	(2)		(3)		(2)		(2)		(2, 17)		(10, 12)		(2)		(7)		(9)	
AM/MD/PM/Sat	In 50.0%	Out 50.0%	In 50.0%	Out 50.0%	In 50.0%	Out 50.0%	In 50.0%	Out 50.0%	In 50.0%	Out 50.0%	In 50.0%	Out 50.0%	In 50.0%	Out 50.0%	In 50.0%	Out 50.0%	In 50.0%	Out 50.0%

- (1) Based on data from *City Environmental Quality Review (CEQR) Technical Manual*, 2014.
- (2) Based on data from *Webster Avenue Rezoning EIS*, 2011.
- (3) Based on data from *East Fordham Road Rezoning EIS*, 2013.
- (4) RJTW based on CTPP 2006-2010 data for census tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and 251.
- (5) JTW based on CTPP 2010-2014 data for census tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and 251.
- (6) Midday and Saturday auto occupancy determined by applying a multiplier (1.4) to the AM/PM rate based on *East New York Rezoning EIS*, 2015.
- (7) Based on data from *East New York Rezoning EIS*, 2015.
- (8) Based on ITE's *Trip Generation Manual* rate for High-Turnover (Sit-Down) Restaurant (932) & Fast-Food Restaurant with Drive-Through (934).
- (9) Based on data from *Lower Concourse Rezoning EIS*, 2009.
- (10) *Crotona Park East / West Farms Rezoning EIS*, 2011.
- (11) Saturday rate based on ITE's *Trip Generation Manual* (8th Edition) average rate proportion between weekday and Saturday
- (12) Assumes weekday midday temporal distribution and in/out splits for Saturday midday.
- (13) Assumes 5 percent of weekday truck trip generation rate (consistent with Lower Concourse Rezoning EIS assumptions for Manufacturing and Warehousing land uses).
- (14) Assumed to be the same as Restaurant land use for *Webster Avenue Rezoning EIS*, 2011.
- (15) Based on data for Covenant House from NYCT - *Number 7 Extension Project EIS*, 2003.
- (16) Saturday trip rate based on ratio between Saturday and weekday rates for Residential lane use. Similarly, Saturday temporal distribution based on weekday versus Saturday midday Residential proportion.
- (17) Based on data from *Pier 57 Redevelopment Project EIS*, 2013.
- (18) Based on ITE's *Trip Generation Manual* rate for Auto Dealership (841).
- (19) Based on ITE's *Trip Generation Manual* rate for Warehousing (150).

Table 3 (continued): Transportation Planning Factors

Land Use	FRESH (Supermarket)	Pre-K (Student)	Pre-K (Staff)	Pre-K (Parent)	Day Care Center	Community Center	Medical Office (Clinic)	Gas Station (With Store)	Transitional Housing (Shelter)	House of Worship
Size/Units	esf	students	staff	parents	esf	esf	esf	esf	beds	esf
Trip Generation	(7)	(7)	(7)	(7)	(7)	(2)	(7)	(9)	(15, 16)	(7)
Weekday	205	2	2	4	33	48	127	90	4.75	19.18
Saturday	271	0	0	0	2	19	127	90	5.65	21.83
	per 1,000 sf	per student	per staff	per parent	per 1,000 sf	per 1,000 sf	per 1,000 sf	per 1,000 sf	per 1,000 sf	per 1,000 sf
Temporal Distribution	(7)	(7)	(7)	(7)	(7)	(2)	(7)	(9)	(15, 16)	(7)
AM	3.0%	50.0%	50.0%	50.0%	16.0%	7.1%	4.0%	6.2%	7.0%	7.9%
MD	12.0%	0.0%	0.0%	0.0%	5.0%	10.0%	11.0%	5.5%	3.0%	4.0%
PM	10.0%	5.0%	5.0%	5.0%	19.0%	7.2%	12.0%	8.2%	10.0%	7.2%
Sat MD	12.0%	0.0%	0.0%	0.0%	12.0%	14.2%	11.0%	5.5%	4.8%	15.8%
Modal Splits	(7)	(5)	(4)	(5)	(7)	(2)	(7)	(9)	(15)	(7)
Auto	4.0%	18.6%	37.0%	18.6%	5.0%	5.0%	30.0%	100.0%	2.0%	5.0%
Taxi	3.0%	1.6%	2.0%	1.6%	1.0%	1.0%	2.0%	0.0%	1.0%	1.0%
Bus	5.0%	15.3%	21.0%	15.3%	6.0%	6.0%	18.0%	0.0%	1.0%	3.0%
Subway	5.0%	50.7%	21.0%	50.7%	3.0%	3.0%	33.0%	0.0%	2.0%	6.0%
Railroad	0.0%	2.5%	1.0%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Walk/Other	83.0%	11.3%	18.0%	11.3%	85.0%	85.0%	17.0%	0.0%	94.0%	85.0%
In/Out Splits	(7)	(7)	(7)	(7)	(7)	(2)	(7)	(9)	(15)	(7)
AM	In 45% Out 55%	In 100% Out 0%	In 100% Out 0%	In 50% Out 50%	In 53% Out 47%	In 61% Out 39%	In 89% Out 11%	In 50% Out 50%	In 15% Out 85%	In 54% Out 46%
MD	In 46% Out 54%	In 0% Out 0%	In 0% Out 0%	In 0% Out 0%	In 50% Out 50%	In 55% Out 45%	In 51% Out 49%	In 50% Out 50%	In 50% Out 50%	In 50% Out 50%
PM	In 47% Out 53%	In 0% Out 100%	In 0% Out 100%	In 50% Out 50%	In 47% Out 53%	In 29% Out 71%	In 48% Out 52%	In 50% Out 50%	In 70% Out 30%	In 52% Out 48%
Sat MD	In 46% Out 54%	In 0% Out 0%	In 0% Out 0%	In 0% Out 0%	In 47% Out 53%	In 49% Out 51%	In 41% Out 59%	In 50% Out 50%	In 50% Out 50%	In 71% Out 29%
Vehicle Occupancy	(7)	(5, 7)	(4, 7)	(7)	(7)	(2)	Weekday Sat	Weekday Sat	Weekday Sat	Weekday Sat
Auto	1.65	1.22	1.13	N/A	1.65	1.65	1.50 1.50	1.00 1.00	1.50 1.50	1.65 1.65
Taxi	1.40	1.30	1.40	N/A	1.40	1.40	1.50 1.50	1.00 1.00	1.50 1.50	1.40 1.40
Truck Trip Generation	(7)	(7)	N/A	N/A	(7)	(2)	(7)	(9)	(9)	(7)
Weekday	0.35	0.03	N/A	N/A	0.07	0.29	0.29	0.35	0.06	0.29
Saturday	0.04	0.03	N/A	N/A	0.00	0.01	0.29	0.02	0	0.29
Temporal Distribution	(7)	(7)	N/A	N/A	(7)	(2)	(7)	(9)	(9)	(7)
AM	10.0%	9.6%	N/A	N/A	9.6%	9.6%	3.0%	7.7%	12.2%	9.6%
MD	8.0%	11.0%	N/A	N/A	11.0%	11.0%	11.0%	11.0%	8.7%	11.0%
PM	5.0%	1.0%	N/A	N/A	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%
Saturday	10.0%	0.0%	N/A	N/A	0.0%	11.0%	0.0%	11.0%	0.0%	0.0%
In/Out Splits	(7)	(7)	N/A	N/A	(7)	(2)	(7)	(9)	(9)	(7)
AM/MD/PM/Sat	In 50.0% Out 50.0%	In 50.0% Out 50.0%	N/A N/A	N/A N/A	In 50.0% Out 50.0%	In 50.0% Out 50.0%	In 50.0% Out 50.0%	In 50.0% Out 50.0%	In 50.0% Out 50.0%	In 50.0% Out 50.0%

- (1) Based on data from *City Environmental Quality Review (CEQR) Technical Manual*, 2014.
- (2) Based on data from *Webster Avenue Rezoning EIS*, 2011.
- (3) Based on data from *East Fordham Road Rezoning EIS*, 2013.
- (4) RTJW based on CTPP 2006-2010 data for census tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and
- (5) JTW based on CTPP 2010-2014 data for census tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and 251.
- (6) Midday and Saturday auto occupancy determined by applying a multiplier (1.4) to the AM/PM rate based on *East New York Rezoning EIS*,
- (7) Based on data from *East New York Rezoning EIS*, 2015.
- (8) Based on ITE's *Trip Generation Manual* rate for High-Turnover (Sit-Down) Restaurant (932) & Fast-Food Restaurant with Drive-Through (934).
- (9) Based on data from *Lower Concourse Rezoning EIS*, 2009.
- (10) *Crotona Park East / West Farms Rezoning EIS*, 2011.
- (11) Saturday rate based on ITE's *Trip Generation Manual* (8th Edition) average rate proportion between weekday and
- (12) Assumes weekday midday temporal distribution and in/out splits for Saturday
- (13) Assumes 5 percent of weekday truck trip generation rate (consistent with Lower Concourse Rezoning EIS assumptions for Manufacturing and Warehousing land
- (14) Assumed to be the same as Restaurant land use for *Webster Avenue Rezoning EIS*, 2011.
- (15) Based on data for Covenant House from *NYCT - Number 7 Extension Project EIS*, 2003.
- (16) Saturday trip rate based on ratio between Saturday and weekday rates for Residential lane use. Similarly, Saturday temporal distribution based on weekday versus Saturday midday Residential
- (17) Based on data from *Pier 57 Redevelopment Project EIS*, 2013.
- (18) Based on ITE's *Trip Generation Manual* rate for Auto Dealership (841).
- (19) Based on ITE's *Trip Generation Manual* rate for Warehousing (150).

Residential-based trips in the weekday midday peak hour more likely would be local, compared to non-local trips made during the commuter peak hours (and local trips would be expected to have a higher walk share, for example). However, modal splits based on the ACS journey-to-work data are conservatively assumed for all periods.

Local Retail

The trip generation rates and temporal distributions for local retail uses are based on data from the *CEQR Technical Manual*. The modal and directional in/out splits and vehicle occupancy rates are based on data from the *Webster Avenue Rezoning EIS*. Truck trip generation rates and temporal distributions are based on data from the *CEQR Technical Manual*. For the purposes of the travel demand forecast, it is assumed that ten percent of all local retail trips would be linked trips, with multiple destinations within the rezoning area, as permitted according to the *CEQR Technical Manual*. FRESH supermarkets are proposed for the rezoning area and the trip generator factors were based on the *East New York Rezoning EIS*. The gas station trip generator factors were based on the *Lower Concourse Rezoning EIS*.

Regional Retail

The trip generation rates and temporal distributions for regional retail uses are based on data from the *CEQR Technical Manual*. The modal splits are based on reverse journey-to-work data and directional in/out splits, and vehicle occupancy rates are based on data from the *East Fordham Road Rezoning EIS*. Truck trip generation rates and temporal distributions were also based on data from the *East Fordham Road Rezoning EIS*.

Non-Retail Commercial Uses

Non-retail commercial land uses within the rezoning area in the No-Action and/or With-Action conditions include office, restaurant, and auto-related uses (auto repair, auto sales, gas station). As shown in **Table 3**, the factors used to forecast travel demand from these uses were developed from a variety of sources, including the *CEQR Technical Manual*, ITE's *Trip Generation Manual* (8th Edition), the *Webster Avenue Rezoning EIS*, *East New York Rezoning EIS*, *Lower Concourse Rezoning EIS*, and AASHTO CTPP reverse journey-to-work data for workers in the census tracts in the study area (Bronx Census Tracts 195, 197, 199, 209, 211, 213.02, 217, 219, 221.01, 221.02, 223, 227.01, 227.02, 233.01, 235.01, 237.03, 237.04, 239, 241, 243, 251, 253.) A 25-percent linked-trip "credit" is assumed for the restaurant use, consistent with the *Webster Avenue Rezoning EIS*.

Community Facility

The types of community facility uses that would be considered within the rezoning area for the RWCDs in the No-Action and With-Action conditions include medical office, pre-K school, day care center, community center, transitional housing, and religious uses. The factors used to forecast travel demand from these land uses were developed from a variety of sources, including the *CEQR Technical Manual*, the *Webster Avenue Rezoning EIS*, *East New York Rezoning EIS*, *Number 7 Extension Project EIS*, and journey-to-work/reverse journey-to-work census data.

Light Industrial / Warehouse

The trip generation rates, temporal distributions, in/out splits, and vehicle occupancies for light industrial lane uses were primarily based on data from the *Crotona Park East / West Farms Rezoning EIS*. Saturday trip generation rates were estimated based on *ITE Trip Generation Manual* data. The trip generation rates, temporal distributions, in/out splits, and vehicle occupancies for warehouse lane uses were primarily based on data from the *Lower Concourse Rezoning EIS* and *ITE's Trip Generation Manual*.

TRIP GENERATION

The person and vehicle trips expected to result from the Proposed Actions are expressed as an “incremental change” or “net change” in trips. This incremental change is calculated by comparing the estimated numbers of trips resulting from the Proposed Actions (in the 2026 analysis year) to the numbers of trips estimated to be occurring in the vicinity of the rezoning area without the Proposed Actions. Trips are calculated based on the transportation planning factors shown previously in **Table 3: Transportation Planning Factors**

Land Use	Local Retail	Regional Retail	Office	Residential	Restaurant (sit-down)	Light Industrial	Auto Repair	Auto Dealership	Warehouse
Size/Units	esf	esf	esf	DU	esf	esf	esf	esf	esf
Trip Generation	(1)	(1)	(1)	(1)	(17)	(10, 11)	(2)	(18)	(19)
Weekday	205	78.2	18	8.075	173	11.5	19.42	45.6	4.9
Saturday	240	92.5	3.9	9.6	181	1.7	19.42	28.8	1.7
	per 1,000 sf	per 1,000 sf	per 1,000 sf	per DU	per 1,000 sf	per 1,000 sf	per 1,000 sf	per 1,000 sf	per 1,000 sf
Temporal Distribution	(1)	(1)	(1)	(1)	(17)	(10, 12)	(2)	(7, 18)	(9, 19)
AM	3.0%	3.0%	12.0%	10.0%	0.9%	13.0%	13.2%	6.1%	8.4%
MD	19.0%	9.0%	15.0%	5.0%	6.2%	10.0%	11.0%	12.0%	14.0%
PM	10.0%	9.0%	14.0%	11.0%	8.3%	14.0%	14.2%	7.8%	8.9%
Sat MD	10.0%	11.0%	17.0%	8.0%	11.0%	10.0%	11.0%	14.1%	10.6%
Modal Splits	(2)	(4)	(4)	(5)	(17)	(4)	(2)	(7)	(4)
Auto	3.0%	37.0%	37.0%	19.3%	25.0%	37.0%	85.0%	100.0%	37.0%
Taxi	2.0%	2.0%	2.0%	1.8%	20.0%	2.0%	5.0%	0.0%	2.0%
Bus	10.0%	21.0%	21.0%	15.4%	5.0%	21.0%	1.0%	0.0%	21.0%
Subway	5.0%	21.0%	21.0%	49.2%	30.0%	21.0%	1.0%	0.0%	21.0%
Railroad	0.0%	1.0%	1.0%	2.9%	0.0%	1.0%	0.0%	0.0%	1.0%
Walk/Other	80.0%	18.0%	18.0%	11.4%	20.0%	18.0%	8.0%	0.0%	18.0%

	(2)		(3)		(2)		(2)		(2.17)		(10.12)		(2)		(7.18)		(9.19)	
In/Out Solits	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
AM	50%	50%	52%	48%	96%	4%	15%	85%	94%	6%	88%	12%	65%	35%	74%	26%	79%	21%
MD	50%	50%	52%	48%	39%	61%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%	50%
PM	50%	50%	52%	48%	5%	95%	70%	30%	67%	33%	12%	88%	50%	50%	39%	61%	25%	75%
Sat MD	50%	50%	52%	48%	60%	40%	50%	50%	50%	50%	50%	50%	50%	50%	51%	49%	64%	36%
Vehicle Occupancy	(2)		(3)		(2.4)		(2.5, 6)		(17)		(10)		(2)		(7)		(9.19)	
Auto	1.60		2.20		1.13		1.21	1.69	2.20		1.65		1.30		1.30		1.30	
Taxi	1.20		2.00		1.40		1.4	1.4	2.30		1.40		1.30		1.50		2.00	
Truck Trip Generation	(1)		(3)		(1)		(1)		(17)		(10.13)		(2)		(7)		(9)	
Weekday	0.35		0.35		0.32		0.06		3.60		0.52		0.89		0.15		0.67	
Saturday	0.04		0.35		0.01		0.02		3.60		0.03		0.05		0.15		0.03	
Temporal Distribution	(1)		(3)		(1)		(1)		(2.17)		(10.12)		(2)		(7)		(9)	
AM	8.0%		8.0%		10.0%		12.0%		6.0%		12.0%		14.0%		9.6%		14.0%	
MD	11.0%		11.0%		11.0%		9.0%		6.0%		9.0%		9.0%		11.0%		9.0%	
PM	2.0%		2.0%		2.0%		2.0%		1.0%		2.0%		1.0%		1.0%		1.0%	
Saturday	11.0%		11.0%		11.0%		9.0%		6.0%		9.0%		9.0%		11.0%		9.0%	
In/Out Solits	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
AM/MD/PM/Sat	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%

- (1) Based on data from *City Environmental Quality Review (CEQR) Technical Manual*, 2014.
- (2) Based on data from *Webster Avenue Rezoning EIS*, 2011.
- (3) Based on data from *East Fordham Road Rezoning EIS*, 2013.
- (4) RJTW based on CTPP 2006-2010 data for census tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and 251.
- (5) JTW based on CTPP 2010-2014 data for census tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and 251.
- (6) Midday and Saturday auto occupancy determined by applying a multiplier (1.4) to the AM/PM rate based on *East New York Rezoning EIS*, 2015.
- (7) Based on data from *East New York Rezoning EIS*, 2015.
- (8) Based on ITE's *Trip Generation Manual* rate for High-Turnover (Sit-Down) Restaurant (932) & Fast-Food Restaurant with Drive-Through (934).
- (9) Based on data from *Lower Concourse Rezoning EIS*, 2009.
- (10) *Crotana Park East / West Farms Rezoning EIS*, 2011.
- (11) Saturday rate based on ITE's *Trip Generation Manual* (8th Edition) average rate proportion between weekday and Saturday
- (12) Assumes weekday midday temporal distribution and in/out splits for Saturday midday.
- (13) Assumes 5 percent of weekday truck trip generation rate (consistent with Lower Concourse Rezoning EIS assumptions for Manufacturing and Warehousing land uses).
- (14) Assumed to be the same as Restaurant land use for *Webster Avenue Rezoning EIS*, 2011.
- (15) Based on data for Covenant House from *NYCT - Number 7 Extension Project EIS*, 2003.
- (16) Saturday trip rate based on ration between Saturday and weekday rates for Residential lane use. Similarly, Saturday temporal distribution based on weekday versus Saturday midday Residential proportion.
- (17) Based on data from *Pier 57 Redevelopment Project EIS*, 2013.
- (18) Based on ITE's *Trip Generation Manual* rate for Auto Dealership (841).
- (19) Based on ITE's *Trip Generation Manual* rate for Warehousing (150).

Table 3 (continued): Transportation Planning Factors

Land Use	FRESH (Supermarket)	Pre-K (Student)	Pre-K (Staff)	Pre-K (Parent)	Day Care Center	Community Center	Medical Office (Clinic)	Gas Station (With Store)	Transitional Housing (Shelter)	House of Worship
Size/Units	esf	students	staff	parents	esf	esf	esf	esf	beds	esf
Trip Generation	(7)	(7)	(7)	(7)	(7)	(2)	(7)	(9)	(15, 16)	(7)
Weekday	205	2	2	4	33	48	127	90	4.75	19.18
Saturday	271	0	0	0	2	19	127	90	5.65	21.83
	per 1,000 sf	per student	per staff	per parent	per 1,000 sf	per 1,000 sf	per 1,000 sf	per 1,000 sf	per 1,000 sf	per 1,000 sf
Temporal Distribution	(7)	(7)	(7)	(7)	(7)	(2)	(7)	(9)	(15, 16)	(7)
AM	3.0%	50.0%	50.0%	50.0%	16.0%	7.1%	4.0%	6.2%	7.0%	7.9%
MD	12.0%	0.0%	0.0%	0.0%	5.0%	10.0%	11.0%	5.5%	3.0%	4.0%
PM	10.0%	5.0%	5.0%	5.0%	19.0%	7.2%	12.0%	8.2%	10.0%	7.2%
Sat MD	12.0%	0.0%	0.0%	0.0%	12.0%	14.2%	11.0%	5.5%	4.8%	15.8%
Modal Splits	(7)	(5)	(4)	(5)	(7)	(2)	(7)	(9)	(15)	(7)
Auto	4.0%	18.6%	37.0%	18.6%	5.0%	5.0%	30.0%	100.0%	2.0%	5.0%
Taxi	3.0%	1.6%	2.0%	1.6%	1.0%	1.0%	2.0%	0.0%	1.0%	1.0%
Bus	5.0%	15.3%	21.0%	15.3%	6.0%	6.0%	18.0%	0.0%	1.0%	3.0%
Subway	5.0%	50.7%	21.0%	50.7%	3.0%	3.0%	33.0%	0.0%	2.0%	6.0%
Railroad	0.0%	2.5%	1.0%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Walk/Other	83.0%	11.3%	18.0%	11.3%	85.0%	85.0%	17.0%	0.0%	94.0%	85.0%
In/Out Splits	(7)	(7)	(7)	(7)	(7)	(2)	(7)	(9)	(15)	(7)
AM	In 45% Out 55%	In 100% Out 0%	In 100% Out 0%	In 50% Out 50%	In 53% Out 47%	In 61% Out 39%	In 89% Out 11%	In 50% Out 50%	In 15% Out 85%	In 54% Out 46%
MD	In 46% Out 54%	In 0% Out 0%	In 0% Out 0%	In 0% Out 0%	In 50% Out 50%	In 55% Out 45%	In 51% Out 49%	In 50% Out 50%	In 50% Out 50%	In 50% Out 50%
PM	In 47% Out 53%	In 0% Out 100%	In 0% Out 100%	In 50% Out 50%	In 47% Out 53%	In 29% Out 71%	In 48% Out 52%	In 50% Out 50%	In 70% Out 30%	In 52% Out 48%
Sat MD	In 46% Out 54%	In 0% Out 0%	In 0% Out 0%	In 0% Out 0%	In 47% Out 53%	In 49% Out 51%	In 41% Out 59%	In 50% Out 50%	In 50% Out 50%	In 71% Out 29%
Vehicle Occupancy	(7)	(5, 7)	(4, 7)	N/A	(7)	(2)	Weekday Sat	Weekday Sat	Weekday Sat	Weekday Sat
Auto	1.65	1.22	1.13	N/A	1.65	1.65	1.50 1.50	1.00 1.00	1.50 1.50	1.65 1.65
Taxi	1.40	1.30	1.40	N/A	1.40	1.40	1.50 1.50	1.00 1.00	1.50 1.50	1.40 1.40
Truck Trip Generation	(7)	(7)	N/A	N/A	(7)	(2)	(7)	(9)	(9)	(7)
Weekday	0.35	0.03	N/A	N/A	0.07	0.29	0.29	0.35	0.06	0.29
Saturday	0.04	0.03	N/A	N/A	0.00	0.01	0.29	0.02	0	0.29
Temporal Distribution	(7)	(7)	N/A	N/A	(7)	(2)	(7)	(9)	(9)	(7)
AM	10.0%	9.6%	N/A	N/A	9.6%	9.6%	3.0%	7.7%	12.2%	9.6%
MD	8.0%	11.0%	N/A	N/A	11.0%	11.0%	11.0%	11.0%	8.7%	11.0%
PM	5.0%	1.0%	N/A	N/A	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%
Saturday	10.0%	0.0%	N/A	N/A	0.0%	11.0%	0.0%	11.0%	0.0%	0.0%
In/Out Splits	(7)	(7)	N/A	N/A	(7)	(2)	(7)	(9)	(9)	(7)
AM/MD/PM/Sat	In 50.0% Out 50.0%	In 50.0% Out 50.0%	N/A N/A	N/A N/A	In 50.0% Out 50.0%	In 50.0% Out 50.0%	In 50.0% Out 50.0%	In 50.0% Out 50.0%	In 50.0% Out 50.0%	In 50.0% Out 50.0%

- (1) Based on data from *City Environmental Quality Review (CEQR) Technical Manual*, 2014.
- (2) Based on data from *Webster Avenue Rezoning EIS*, 2011.
- (3) Based on data from *East Fordham Road Rezoning EIS*, 2013.
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- (5) JTW based on CTPP 2010-2014 data for census tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and 251.
- (6) Midday and Saturday auto occupancy determined by applying a multiplier (1.4) to the AM/PM rate based on *East New York Rezoning EIS*,
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- (9) Based on data from *Lower Concourse Rezoning EIS*, 2009.
- (10) *Crotona Park East / West Farms Rezoning EIS*, 2011.
- (11) Saturday rate based on ITE's *Trip Generation Manual* (8th Edition) average rate proportion between weekday and
- (12) Assumes weekday midday temporal distribution and in/out splits for Saturday
- (13) Assumes 5 percent of weekday truck trip generation rate (consistent with Lower Concourse Rezoning EIS assumptions for Manufacturing and Warehousing land
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- (17) Based on data from *Pier 57 Redevelopment Project EIS*, 2013.
- (18) Based on ITE's *Trip Generation Manual* rate for Auto Dealership (841).
- (19) Based on ITE's *Trip Generation Manual* rate for Warehousing (150).

, “Travel Demand Forecast,” lists the estimate of the net incremental change in peak-hour person trips and vehicle trips, respectively (as compared to conditions in the area without the Proposed Actions) that would occur in 2026 with implementation of the Proposed Actions.

The Proposed Actions would be expected to generate a net increase of approximately 4,055 person trips in the weekday AM peak hour, 9,600 person trips in the weekday midday, 7,674 person trips in the weekday PM peak hour, and 8,354 person trips in the Saturday midday peak hour. These person trips can be translated into modal trip “types” for the entire study area as follows:

- Peak hour vehicle trips (including auto, truck, and taxi trips balanced to reflect that some taxis arrive or depart empty) would be expected to result in additional trips – approximately 405, 524, 671, and 617 vehicle trips (“in” and “out” trips, combined) in the weekday AM, midday, PM, and Saturday midday peak hours, respectively.
- Peak hour subway trips would increase by a net total of approximately 1,382, 1,136, 1,748, and 1,649 in the weekday AM, midday, PM, and Saturday midday peak hours, respectively.
- Peak hour bus trips would increase by a net total of approximately 555, 1,037, 935, and 985 in the weekday AM, midday, PM, and Saturday midday peak hours, respectively.
- Walk trips would increase by approximately 1,607, 6,772, 4,143, and 4,787 trips during the respective weekday AM, midday, PM, and Saturday midday peak hours.

The Proposed Actions are not expected to generate substantial numbers of trips by Metro-North Railroad (MNR). MNR’s Morris Heights station is located more than ½-mile from the project corridor and the projected development sites (and therefore not within a convenient walking distance). Commuter rail trips generated by the Proposed Actions would likely start or end as on another mode of transit (i.e., subway or bus) and are assumed to be reflected in the forecast for these modes.



Table 4 (continued): Travel Demand Forecast

Table with columns: Land Use, Pre-K (Student), Pre-K (Staff), Pre-K (Parent), Day Care Center, Community Center, Medical Office (Clinic), Gas Station (With Store), Transitional Housing (Shelter), House of Worship, Total. Rows include Peak Hour Trips (AM, MD, PM, Sat MD), Person Trips (AM, MD, PM, Saturday), and Vehicle Trips (AM, MD, PM, Saturday).

Table 5 presents the net incremental change in peak hour vehicle trips (auto, taxi, and truck) that would be generated by five identified development clusters during the weekday AM, midday, PM, and Saturday midday peak hours. As shown in **Table 5**, Cluster 4, the projected developments centered around 170th Street, would account for approximately 40 percent of the total vehicle tips generated in all peak hours.

Table 5: Incremental Vehicle Trips

Cluster	Weekday			Saturday Midday
	AM	Midday	PM	
1	49	77	101	100
2	93	131	154	140
3	5	-11	7	1
4	187	199	294	269
5	71	128	114	106
Total	405	524	671	617

Analysis Periods

According to *CEQR Technical Manual* guidelines, a quantified traffic analysis is typically required if a proposed action would result in more than 50 peak-hour vehicle trip ends. As listed in **Table 4: Travel Demand Forecast**

Land Use	Local Retail ¹		Regional Retail		Office		Residential		Restaurant ² (sit-down)		Light Industrial		Auto Repair		Auto Dealership		Warehouse		Fresh (Supermarket)			
Size/Units	208.1 ksf		42.8 ksf		39.3 ksf		3,250.0 DU		11.6 ksf		-47.8 ksf		-86.8 ksf		-11.2 ksf		-168.7 ksf		23.2 ksf			
Peak Hour Trips:																						
AM	1152		100		85		2624		14		-71		-222		-31		-69		142			
MD	7294		301		106		1312		94		-55		-185		-61		-115		570			
PM	3839		301		99		2887		126		-77		-239		-40		-73		475			
Sat MD	4495		436		26		2496		174		-8		-185		-46		-30		753			
Person Trips:																						
AM	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Auto	17	17	19	18	30	1	76	431	3	0	-23	-3	-123	-66	-23	-8	-20	-5	3	3	3	3
Taxi	12	12	1	1	2	0	7	40	3	0	-1	0	-7	-4	0	0	-1	0	2	2	2	2
Bus	58	58	11	10	17	1	61	344	1	0	-13	-2	-1	-1	0	0	-11	-3	3	4	4	4
Subway	29	29	11	10	17	1	194	1,098	4	0	-13	-2	-1	-1	0	0	-11	-3	3	4	4	4
Railroad	0	0	1	0	1	0	11	65	0	0	-1	0	0	0	0	0	-1	0	0	0	0	0
Walk/Other	461	461	9	9	15	1	45	254	3	0	-11	-2	-12	-6	0	0	-10	-3	53	65	65	65
Total	576	576	52	48	81	3	394	2,231	13	1	-63	-9	-145	-78	-23	-8	-54	-14	64	78	78	78
MD	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Auto	109	109	58	54	15	24	127	127	12	12	-10	-10	-79	-79	-31	-31	-21	-21	10	12	10	12
Taxi	73	73	3	3	1	1	12	12	9	9	-1	-1	-5	-5	0	0	-1	-1	8	9	8	9
Bus	365	365	33	30	9	14	101	101	2	2	-6	-6	-1	-1	0	0	-12	-12	13	15	13	15
Subway	182	182	33	30	9	14	323	323	14	14	-6	-6	-1	-1	0	0	-12	-12	13	15	13	15
Railroad	0	0	2	1	0	1	19	19	0	0	0	0	0	0	0	0	-1	-1	0	0	0	0
Walk/Other	2,918	2,918	28	26	7	12	75	75	9	9	-5	-5	-7	-7	0	0	-10	-10	217	255	217	255
Total	3,647	3,647	157	145	41	65	656	656	47	47	-27	-27	-93	-93	-31	-31	-58	-58	262	308	262	308
PM	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Auto	58	58	58	54	2	35	390	167	21	10	-3	-25	-102	-102	-16	-24	-7	-20	9	10	9	10
Taxi	38	38	3	3	0	2	36	16	17	8	0	-1	-6	-6	0	0	0	-1	7	8	7	8
Bus	192	192	33	30	1	20	311	133	4	2	-2	-14	-1	-1	0	0	-4	-12	11	13	11	13
Subway	96	96	33	30	1	20	994	426	25	12	-2	-14	-1	-1	0	0	-4	-12	11	13	11	13
Railroad	0	0	2	1	0	1	59	25	0	0	0	-1	0	0	0	0	0	-1	0	0	0	0
Walk/Other	1,536	1,536	28	26	1	17	230	99	17	8	-2	-12	-10	-10	0	0	-3	-10	185	209	185	209
Total	1,920	1,920	157	145	5	94	2,021	866	84	41	-9	-68	-120	-120	-16	-24	-18	-55	223	252	223	252
Saturday	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Auto	67	67	84	77	6	4	241	241	22	22	-2	-2	-79	-79	-23	-22	-7	-4	14	16	14	16
Taxi	45	45	5	4	0	0	22	22	17	17	0	0	-5	-5	0	0	0	0	10	12	10	12
Bus	225	225	48	44	3	2	192	192	4	4	-1	-1	-1	-1	0	0	-4	-2	17	20	17	20
Subway	112	112	48	44	3	2	614	614	26	26	-1	-1	-1	-1	0	0	-4	-2	17	20	17	20
Railroad	0	0	2	2	0	0	36	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Walk/Other	1,798	1,798	41	38	3	2	142	142	17	17	-1	-1	-7	-7	0	0	-3	-2	288	338	288	338
Total	2,247	2,247	227	209	16	10	1,248	1,248	87	87	-4	-4	-93	-93	-23	-22	-19	-11	346	407	346	407

Vehicle Trips:																				
	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
AM																				
Auto	11	11	9	8	27	1	63	356	1	0	-14	-2	-95	-51	-18	-6	-15	-4	2	2
Taxi	10	10	1	0	1	0	5	29	1	0	-1	0	-6	-3	0	0	-1	0	1	2
Taxi Balanced	19	19	1	1	1	1	34	34	1	1	-1	-1	-9	-9	0	0	-1	-1	3	3
Truck	3	3	1	1	1	1	12	12	1	1	-1	-1	-5	-5	0	0	-8	-8	0	0
Total	33	33	10	10	29	3	108	401	4	3	-17	-4	-109	-65	-18	-6	-24	-13	5	5
MD																				
Auto	68	68	26	24	14	21	75	75	5	5	-6	-6	-61	-61	-24	-24	-16	-16	6	7
Taxi	61	61	2	1	1	1	8	8	4	4	0	0	-4	-4	0	0	-1	-1	6	7
Taxi Balanced	122	122	3	3	2	2	17	17	8	8	-1	-1	-7	-7	0	0	-1	-1	12	12
Truck	4	4	1	1	1	1	9	9	1	1	-1	-1	-3	-3	0	0	-5	-5	0	0
Total	194	194	30	28	16	23	100	100	15	15	-8	-8	-71	-71	-24	-24	-23	-23	19	20
PM																				
Auto	36	36	26	24	2	31	322	138	10	5	-2	-15	-78	-78	-12	-19	-5	-16	5	6
Taxi	32	32	2	1	0	1	26	11	7	4	0	-1	-5	-5	0	0	0	-1	5	5
Taxi Balanced	64	64	3	3	1	1	37	37	11	11	-1	-1	-9	-9	0	0	-1	-1	10	10
Truck	1	1	0	0	0	0	2	2	0	0	0	0	0	0	0	0	-1	-1	0	0
Total	101	101	30	27	3	32	361	177	21	16	-3	-17	-88	-88	-12	-19	-7	-17	16	16
Saturday																				
Auto	42	42	38	35	5	3	142	142	10	10	-1	-1	-61	-61	-18	-17	-5	-3	8	10
Taxi	37	37	2	2	0	0	16	16	8	8	0	0	-4	-4	0	0	0	0	7	9
Taxi Balanced	75	75	4	4	0	0	32	32	15	15	0	0	-7	-7	0	0	0	0	16	16
Truck	0	0	1	1	0	0	3	3	1	1	0	0	0	0	0	0	0	0	0	0
Total	118	118	43	40	6	4	177	177	26	26	-1	-1	-68	-68	-18	-17	-6	-4	25	26

- (1) Ten-percent linked trips for local retail.
- (2) Twenty-five-percent linked trips for restaurant.

, the Proposed Actions are expected to result in more than 50 total vehicle trips during each weekday analysis hour; therefore, all of these periods will be included in the quantified analysis of traffic conditions. The specific hours to be analyzed in each peak period will be determined based on traffic count data collected along the street network in the study area.

Transit analyses generally examine conditions during the weekday AM and PM commuter peak periods, as it is during these times that overall transit demand (and the potential for significant adverse impacts) is typically greatest. Therefore, the quantitative analyses of transit conditions with the Proposed Actions will focus on these two periods.

According to *CEQR Technical Manual* guidelines, a quantified analysis of pedestrian conditions is typically required if a proposed action would result in 200 or more peak hour pedestrian trips. The net increase in pedestrian trips resulting from the Proposed Actions would exceed the 200-trip *CEQR Technical Manual* analysis threshold during the weekday AM and PM commuter peak hours and the weekday midday peak hour for retail demand. Therefore, all three of these peak hours will be included in the analysis of pedestrian conditions. The specific analysis peak hours will be determined based on pedestrian count data in the study area.

TRAFFIC STUDY AREA

Area Street Network

As previously shown on **Figure 1**, the rezoning area consists of approximately 35 blocks along a two-mile corridor surrounding Jerome Avenue in the Bronx, and the street network is an irregular grid system. The

primary streets providing access to the rezoning area include Jerome, Sedgwick, Tremont, and Burnside avenues, the Grand Concourse, East 167th Street, and Fordham Road. Regional Access is provided by I-95 (Cross-Bronx Expressway) and I-87 (Major Deegan Expressway).

The primary arterial within the rezoning area is Jerome Avenue, which runs north-south within the Bronx from Van Cortlandt Park to the north to the Macombs Dam Bridge at the south end.

The rezoning area is generally bounded by 184th Street to the north, Grand Concourse on the East, McClellan Street to the south, and University Avenue to the west. I-95 (Cross-Bronx Expressway) bisects the area, with exit and entrance ramps at Jerome Avenue adjacent to Featherbed Lane and Mt. Eden Avenue. I-87 (Major Deegan Expressway) runs parallel to the site and is approximately half a mile to the west.

Primary East-West Corridors

East 167th Street is a major collector that runs east-west through the Bronx, starting at Edward L. Grant Highway to the west, and provides connections to the Grand Concourse, Webster and Third avenues, and Edward A. Stevenson Boulevard to the east. In the project vicinity, there is one travel lane in each direction, bike lanes, and curbside parking on both sides of the road. The segment of East 167th Street between River Avenue and Edward L. Grant Highway is a NYCDOT-designated local truck route.

Fordham Road is a principal arterial road that connects Manhattan and the Bronx via the University Heights Bridge and runs east-west through the Bronx until it reaches the Bronx River Parkway, where it transitions to Pelham Parkway. In the vicinity of Jerome Avenue, Fordham Road has two travel lanes and one bus lane per direction. There is no curbside parking while the bus-only lane restrictions are in effect. Fordham Road is a NYCDOT-designated local truck route.

Tremont Avenue is a principal arterial that runs east-west, originating at Sedgwick Avenue to the west and spans the borough to the Throgs Neck section in the southeast corner of the Bronx. In the project vicinity, Tremont Avenue has one travel lane in each direction and curbside parking on both sides.

Burnside Avenue is a minor arterial that runs east-west from University Avenue to the west to Valentine Avenue east of the Grand Concourse. In the project vicinity, Burnside Avenue is a NYCDOT-designated local truck route, has one travel lane in each direction, with curbside parking on both sides of the street.

Cross-Bronx Expressway (I-95) spans the Bronx, originating at I-295 (Throgs Neck) to the east and continuing west across the George Washington Bridge to the New Jersey Turnpike. The expressway has three travel lanes in each direction, provides connections to the Bruckner Expressway (I-278), Hutchinson River Parkway, (I-678), New England Thruway, Sheridan Expressway (I-895), Major Deegan Expressway (I-87), Harlem River Drive, and Henry Hudson Parkway. There are two exits – Exit 2, Jerome Avenue, and Exit 3, Webster Avenue, in the vicinity of the rezoning area. The Cross-Bronx Expressway is a NYCDOT-

designated through truck route (i.e., a through route for trucks who do not have a trip origin or destination within the Bronx).

Primary North-South Corridors

Jerome Avenue is a north-south arterial through the Bronx within the rezoning area. The elevated NYCT 4 subway line runs above Jerome Avenue from East 168th Street to the north end of the study corridor at East 184th Street. Within the project limits, Jerome Avenue has one travel lane in each direction in the center of the roadway between the subway support columns. Along most of the corridor's length, an auxiliary travel lane is provided in each direction between the subway support columns and curbside parking. At some locations, such as at the Burnside Avenue Station, the curbside parking and travel lanes are closed for pedestrian safety purposes. Jerome Avenue is a designated NYCDOT local truck route.

The Grand Concourse is a major arterial that runs north-south through the Bronx and generally provides two mainline travel lanes, one service road lane, and one bike lane within the service roadways in each direction. The mainline roadway is separated from the service roadway by a raised median and curbside parking is provided along the service road.

Bounding the study area to the west is Dr. Martin Luther King Jr. Boulevard, which is also signed as University Avenue in the vicinity of the Bronx Community College and Edward L. Grant Highway below West 174th Street. The boulevard is a principal arterial roadway that has two moving lanes and a curbside lane in each direction and runs approximately parallel to Jerome Avenue for its length. South of Tremont Avenue, a raised median divides the travel directions. University Avenue is a NYCDOT-designated local truck route and provides a combination of bike lanes and shared bike lanes.

Sedgwick Avenue runs parallel to Jerome Avenue, from Mosholu Parkway in the north to the Macombs Dam Bridge in the south. Sedgwick Avenue is a minor arterial that serves as a service road for the Major Deegan Expressway for the majority of its length in the study area, and becomes a primary thoroughfare for the area near the Bronx Community College.

The Major Deegan Expressway (I-87) is an interstate highway that parallels the Harlem River on the west side of the Bronx. The expressway is a NYCDOT-designated through truck route and connects the Bruckner Expressway in the southeastern portion of the Bronx to Westchester and destinations north and west. The expressway has five access points within the vicinity of the rezoning area – Exit 5 - East 161st Street, Exit 6 - East 153rd Street, Exit 7 - I-95 to the Cross Bronx Expressway and George Washington Bridge, Exit 8 - West 179th Street and Exit 9 - West Fordham Road.

Traffic Assignment and Analysis Locations

The assignments of vehicle trips will be based on the location of the projected development and the anticipated origins and destinations of vehicle trips associated with the different uses projected for the

rezoning area (e.g., commercial, residential, etc.). The origins/destinations of residential and non-retail commercial trips used for the assignments are based on 2006-2010 US Census journey-to-work and reverse journey-to-work data, respectively. Retail trip origins/destinations are based on population density in proximity to the rezoning area. **Table 6** presents the directional distributions of auto and taxi trips by land use based on the origin/destination data. Using these distributions, auto and taxi trips were first assigned to various portals on the perimeter of the rezoning area and then assigned via the most direct route to trip nodes located within each cluster or in proximity to an outlier development site.

Truck trips en route to and from each cluster/outlier site were assigned to designated through and local truck routes and then to the most direct paths to and from trip nodes. The majority of truck trips were assigned to the through truck route along the Cross Bronx Expressway and to local truck routes along Jerome Avenue, Fordham Road, and Burnside Avenue.

Table 6: Directional Distributions of Auto/Taxi Trips by Land Use

Land Use	Bronx				Manhattan	Brooklyn	Queens	Long Island	Upstate/CT	Staten Island/NJ/PA
	North	East	South	West						
Non-Retail Commercial	509	2,198	469	274	334	164	666	371	1,552	649
Non-Retail Commercial ¹	7%	31%	7%	4%	5%	2%	9%	5%	22%	9%
Residential	498	1,783	956	280	2,197	213	704	30	1,339	798
Residential ²	6%	20%	11%	3%	25%	2%	8%	0%	15%	9%
Local Retail/Community Uses	66,680	93,365	62,675	51,800	-	-	-	-	-	-
Local Retail/Community Uses ³	24%	34%	23%	19%	-	-	-	-	-	-

Notes:

1. Vehicle (auto/taxi) trip distribution for office and light industrial trips for the proposed rezoning area.
This distribution was based on reverse journey-to-work trips using 2006-2010 US Census data for tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and 251.
2. Vehicle (auto/taxi) trip distribution for market-rate and affordable residential.
This distribution was based on reverse journey-to-work trips using 2006-2010 US Census data for tracts 197, 199, 209, 211, 213.02, 217, 219, 221.01, 223, 227.01, 227.02, 233.01, 239, 241, 243, and 251.
3. Trip distribution for all other uses in the proposed rezoning area (local retail, destination retail, restaurant, auto repair, auto dealership, warehouse, supermarket, pre-K school, day care center, community center, and medical office).
This distribution was based population density for census tracts within an approximate 1/2-mile distance of the proposed rezoning area.

As noted previously, the Proposed Actions would be expected to generate a net increase of 405 vehicle trips during the weekday AM peak hour, 524 vehicle trips during the weekday midday peak hour, 671 vehicle trips during the weekday PM peak hour, and 617 vehicle trips during the Saturday midday peak hour. As these traffic volumes would exceed 50 trips in each peak hour (the *CEQR Technical Manual* Level 1 screening threshold for a detailed analysis), a preliminary assignment of net increment traffic volumes has been prepared to identify critical intersections that would potentially exceed 50 trips per hour (a Level 2 screening assessment). **Figure 2** shows the locations of the 36 that were selected for detailed analysis. Net incremental peak hour vehicle trips are assigned to intersections to be analyzed within the traffic study area, as summarized in **Table 7**.

TRANSIT

The rezoning area is served by three subway lines – the elevated 4 (IRT) line on Jerome Avenue and the B/D (IND) lines along the Grand Concourse to the east.

According to the general thresholds used by the MTA and specified in the *CEQR Technical Manual*, detailed transit analyses are required if a proposed action is projected to result in greater than 200 peak hour rail or bus transit riders. If a proposed action would result in 50 or more bus passengers being assigned to a single bus line (in one direction), or if it would result in an increase of 200 or more passengers at a single subway station or on a single subway line, a detailed bus or subway analysis would be warranted.

The Proposed Actions are expected to generate over 200 peak hour rail on a single line, and likely will also result in greater than 50 bus passengers being assigned to a single bus line in one direction. Therefore, a detailed bus and subway analysis is warranted.

Subway Analysis

Subway Stations

There are a total of eleven NYCT subway stations within, or in close proximity to, the rezoning area. These stations are presented on **Figure 3** along with the subway routes serving each facility. The 4 line operating along Jerome Avenue serves six elevated stations above Jerome Avenue within the rezoning area, including, 183rd Street, Burnside Avenue, 176th Street, Mt. Eden Avenue, 170th Street, and 167th Street. Five underground stations (182nd-183rd Streets, Tremont Avenue, 174th-175th Streets, 170th Street, and 167th Street) are served by the B/D subway lines operating on the Grand Concourse to the east of the rezoning area. Nearly all the projected development sites are closer to the Jerome Avenue 4 stations than the Grand Concourse B/D stations; consequently, all subway trips were assigned to Jerome Avenue stations except for one projected development site that was closer to the 170th Street B/D station.

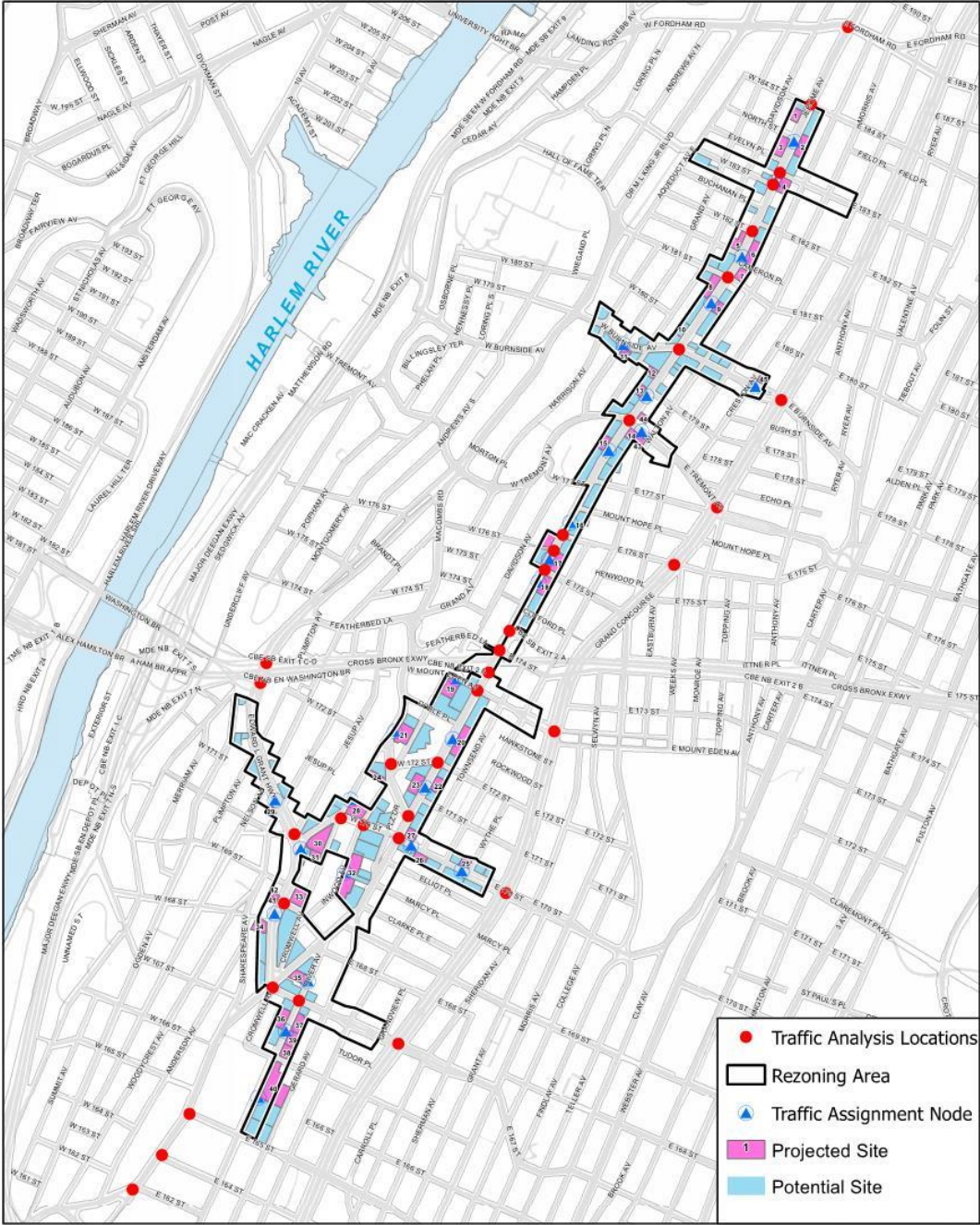


Figure 2

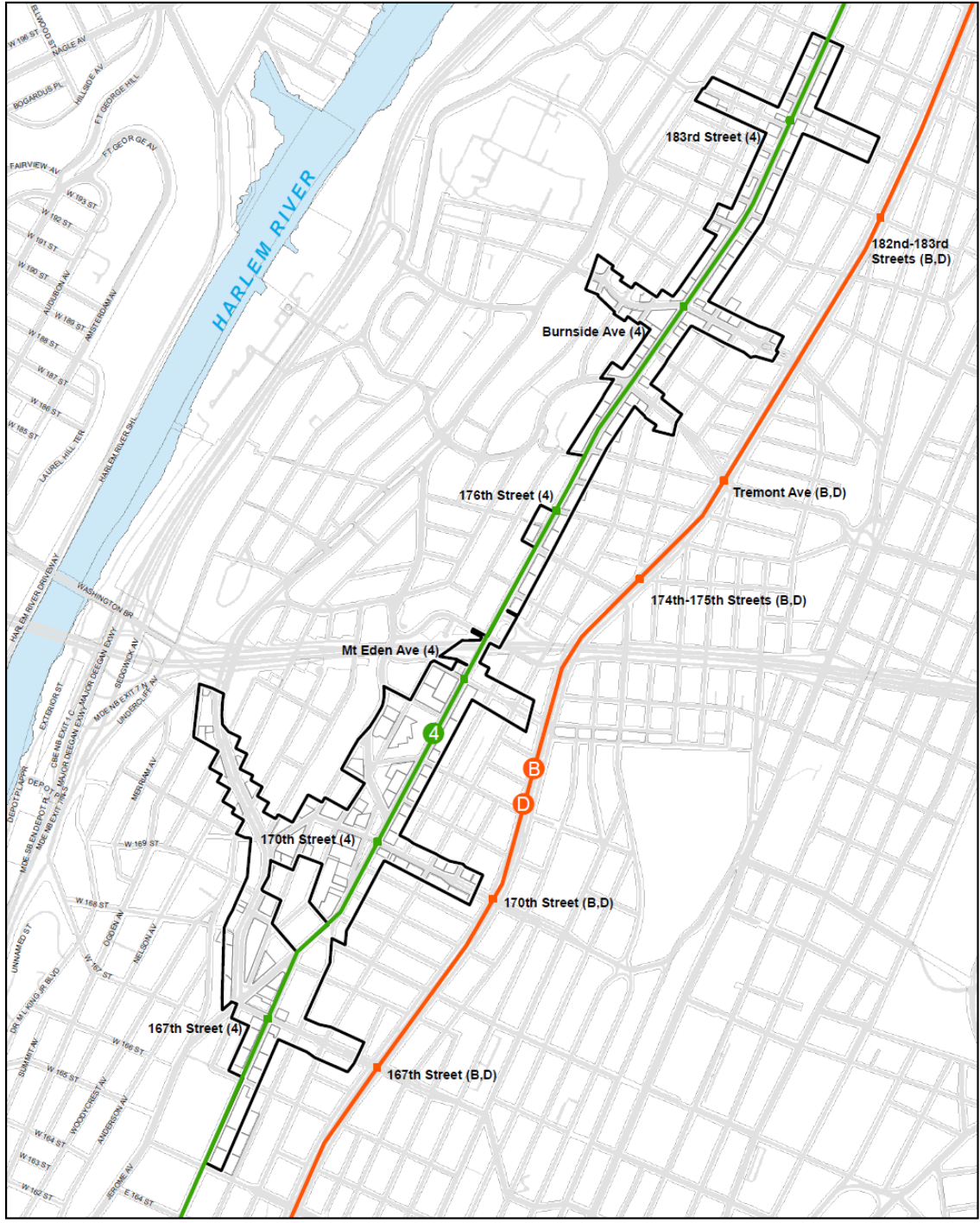
Jerome Avenue Rezoning Proposal

TRAFFIC ANALYSIS LOCATIONS

Table 7: RWCDs Net Incremental Peak Hour Vehicle Trips by Intersection

Intersection	Incremental Peak Hour Trips			
	AM	Midday	PM	Sat MD
Jerome Avenue at Kingsbridge Road	-3	+ 79	+ 58	+ 82
Jerome Avenue at Fordham Road	+ 42	+ 103	+ 113	+ 116
Jerome Avenue at 184 th Street	+ 41	+ 89	+ 114	+ 125
Jerome Avenue at East 183 rd Street	+ 35	+ 93	+ 98	+ 100
Jerome Avenue at West 183 rd Street	+ 33	+ 104	+ 105	+ 112
Jerome Avenue at West 182 nd Street	+ 31	+ 100	+ 102	+ 109
Jerome Avenue at West 181 st Street	+ 28	+ 121	+ 106	+ 117
Jerome Avenue at Burnside Avenue	+ 29	+ 131	+ 117	+ 119
Jerome Avenue at Tremont Avenue	+ 35	+ 91	+ 111	+ 123
Jerome Avenue at East 176 th Street	+ 44	+ 117	+ 102	+ 108
Jerome Avenue at 175 th Street	+ 46	+ 96	+ 96	+ 93
Jerome Avenue at I-95 Westbound Ramps	+ 109	+ 108	+ 137	+ 122
Jerome Avenue at Featherbed Lane	+ 87	+ 96	+ 119	+ 110
Jerome Avenue at I-95 Eastbound Ramps	+ 111	+ 93	+ 162	+ 129
Jerome Avenue at Mt. Eden Avenue	+ 88	+ 109	+ 157	+ 139
Jerome Avenue at Macombs Road	+ 79	+ 68	+ 89	+ 88
Jerome Avenue at 172 nd Street	+ 61	+ 65	+ 121	+ 105
Jerome Avenue at 170 th Street	+ 74	+ 109	+ 131	+ 122
Jerome Avenue at 167 th Street/Edward L Grant Hwy	+ 80	+ 88	+ 103	+ 91
Jerome Avenue at East 165 th Street	+ 62	+ 28	+ 69	+ 48
Jerome Avenue at East 164 th Street	+ 61	+ 23	+ 64	+ 44
Jerome Avenue at Macombs Dam Bridge	+ 55	+ 22	+ 62	+ 41

Grand Concourse at East Burnside Avenue	+ 13	+ 53	+ 43	+ 45
Grand Concourse at East Tremont Avenue	+ 10	+ 25	+ 37	+ 64
Grand Concourse at East 176 th Street	+ 14	+ 54	+ 44	+ 65
Grand Concourse at Mt. Eden Avenue	+ 1	+ 57	+ 49	+ 64
Grand Concourse at East 170 th Street	+ 32	+ 88	+ 99	+ 111
Grand Concourse at East 167 th Street	+ 37	+ 99	+ 86	+ 104
Inwood Avenue at West 170 th Street	+ 25	+ 54	+ 78	+ 62
Cromwell Avenue at West 170 th Street	+ 12	+ 61	+ 83	+ 60
University Avenue at Washington Bridge On-Ramps	+ 50	+ 33	+ 50	+ 35
University Avenue at Washington Bridge Off-Ramps	+ 32	+ 30	+ 53	+ 36
Edward L Grant Hwy at West 170 th Street	+ 29	+ 43	+ 47	+ 39
Edward L Grant Hwy at West 169 th Street	+ 34	+ 55	+ 41	+ 45
River Avenue at East 167 th Street	+ 31	+ 59	+ 41	+ 46
Macombs Road at West 172 nd Street	+ 32	+31	+41	+33



0 0.25 0.5 Miles

Jerome Avenue Rezoning Proposal

Figure 3

NYCT Subway Lines in the Rezoning Area

Subway Assignment and Analyzed Stations

As shown in **Table 4**, under the RWCDs, the Proposed Actions would generate a net increment of approximately 1,382 and 1,748 subway trips during the weekday AM and PM commuter peak hours, respectively. Trips from each development cluster or outlier site were assigned to the individual stations serving the rezoning area based on proximity to projected development sites. **Table 8** shows the estimated net incremental subway trips generated by the Proposed Actions during the weekday AM and PM peak hours at each of the subway stations serving the rezoning area. As shown in **Table 8**, the highest number of peak hour subway trips are expected to occur at the 170th Street station on the Jerome Avenue 4 Line, which would experience approximately 613 incremental trips (in and out combined) in the AM peak hour and 728 in the PM peak hour.

Table 8: RWCDs Net Incremental Peak Hour Subway Trips by Station

Subway Station (Line)	AM Peak Hour Trips			PM Peak Hour Trips		
	Boarding	Alighting	Total	Boarding	Alighting	Total
167 th Street (4)	143	30	173	78	150	228
170 th Street (4)	522	91	613	228	500	728
Mt. Eden Avenue (4)	72	15	87	38	72	110
176 th Street (4)	118	22	140	62	124	186
Burnside Avenue (4)	115	49	164	98	136	234
183 rd Street (4)	154	30	184	72	157	229
170 th Street (B, D)	17	3	20	7	25	32

The analysis of subway station conditions focuses on a total of four subway stations at which incremental demand from the Proposed Actions would exceed the 200-trip CEQR Technical Manual analysis threshold in one or both peak hours. As shown in **Table 8**, these subway stations include:

- 167th Street (4)
- 170th Street (4)
- Burnside Avenue (4)
- 183rd Street (4)

For each of these facilities, key circulation elements (e.g., street stairs and fare arrays) expected to be used by concentrations of new demand from the Proposed Actions are analyzed.

Subway Line Haul

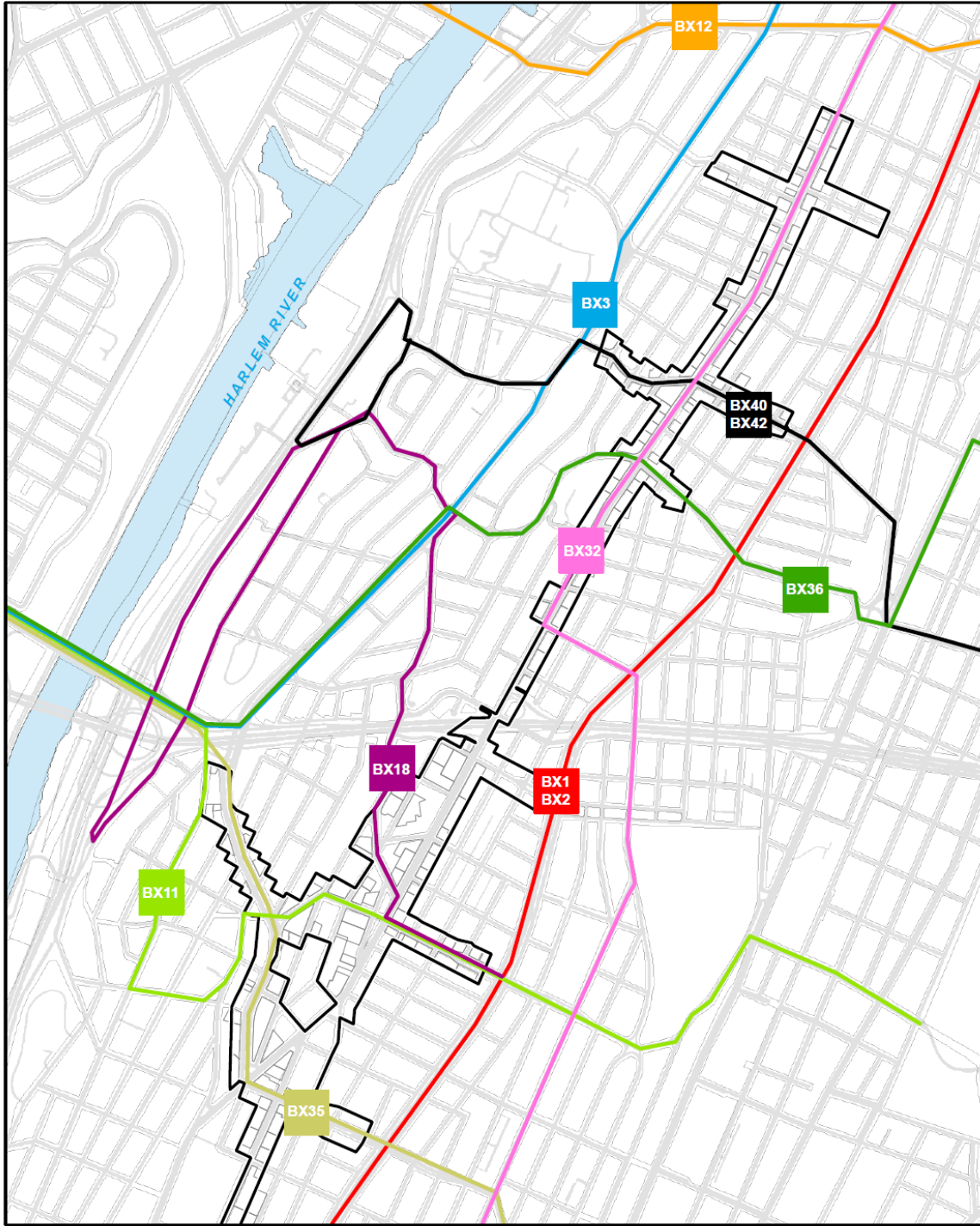
As discussed above, the rezoning area is served by three NYCT subway routes, including the 4, B, and D lines. As the Proposed Actions are expected to generate 200 or more new subway trips in one direction on one or more of these routes, an analysis of subway line haul conditions is included in the EIS. The analysis uses existing maximum load point subway service and ridership data provided by NYCT to assess existing, future No-Action, and future With-Action conditions at the peak load points of the respective subway lines during the weekday AM and PM peak hours.

Bus Analysis

Bus Routes

The rezoning area is served by nine local NYCT bus routes (see **Figure 4**) and include the following:

- Bx1 connects Riverdale to Mott Haven along the Grand Concourse adjacent to the site
- Bx2 connects Kingsbridge to Mott Haven along the Grand Concourse adjacent to the site
- Bx11 operates between Longwood in the Bronx and the George Washington Bridge Bus Terminal in Manhattan via Claremont Parkway and 170th Street
- Bx18 operates between Morris Heights and Morrisania via Macombs Road. The Bx18 primarily serves as a connection between the Morris Heights neighborhood and the 4 Line subway station at Jerome Avenue and 170th Street within the rezoning area. The Bx18 has the lowest peak hour ridership and service frequency of the bus routes within the rezoning area and would not likely be used by new bus trips generated by the rezoning project; therefore, no new trips were assigned to this route.
- Bx32 operates between the Bronx VA Medical Center and Mott Haven via Morris and Jerome avenues
- Bx35 connects Hunts Point in the Bronx to Washington Heights via East 167th and West 181st streets
- Bx36 connects Soundview in the Bronx to Washington Heights in Manhattan via East 174th and East 180th streets
- Bx40 operates between Morris Heights and Fort Schuyler via East Tremont Avenue
- Bx42 operates between Morris Heights and Throgs Neck via East Tremont Avenue



N
0 0.25 0.5 Miles
Jerome Avenue Rezoning Proposal

Figure 4
NYCT Bus Routes in the Rezoning Area

Bus Assignment and Analyzed Routes

As presented in **Table 4**, the projected development sites are expected to generate a net total of approximately 555 and 935 incremental trips by bus during the weekday AM and PM peak hours, respectively. These local bus trips were assigned to each route based on proximity to individual projected development sites or clusters and current ridership patterns. **Table 9** presents the anticipated number of new riders expected on each bus route in the AM and PM peak hours. According to the general thresholds used by the MTA and specified in the *CEQR Technical Manual*, a detailed analysis of bus conditions is generally not required if a proposed action is projected to result in fewer than 50 peak hour trips being assigned to a single bus route (in one direction), as this level of new demand is considered unlikely to result in significant adverse impacts. As listed in **Table 9**, several of these bus routes are expected to carry 50 or more new trips in one direction in at least one peak hour and will be analyzed in the EIS.

Table 9: RWCDS Net Incremental Peak Hour Bus Trips by Route and Direction

Route	Direction	AM Peak Hour			PM Peak Hour		
		Alighting	Boarding	Total	Alighting	Boarding	Total
BX1	NB	2	0	2	-3	0	-3
	SB	2	1	3	-2	-1	-3
BX2	NB	2	0	2	-3	0	-3
	SB	1	0	1	-1	0	-1
BX11	EB	22	93	115	114	69	183
	WB	22	93	115	114	69	183
BX32	NB	23	36	59	100	34	134
	SB	12	72	84	50	69	119
BX35	EB	15	41	56	61	45	106
	WB	15	41	56	61	45	106
BX36	EB	1	1	2	1	2	3
	WB	0	11	11	8	0	8
BX40	EB	9	1	10	3	21	24
	WB	1	13	14	24	2	26
BX42	EB	9	1	10	3	21	24
	WB	1	13	14	24	2	26

Notes:

Bold - denotes greater than 50 incremental trips per direction

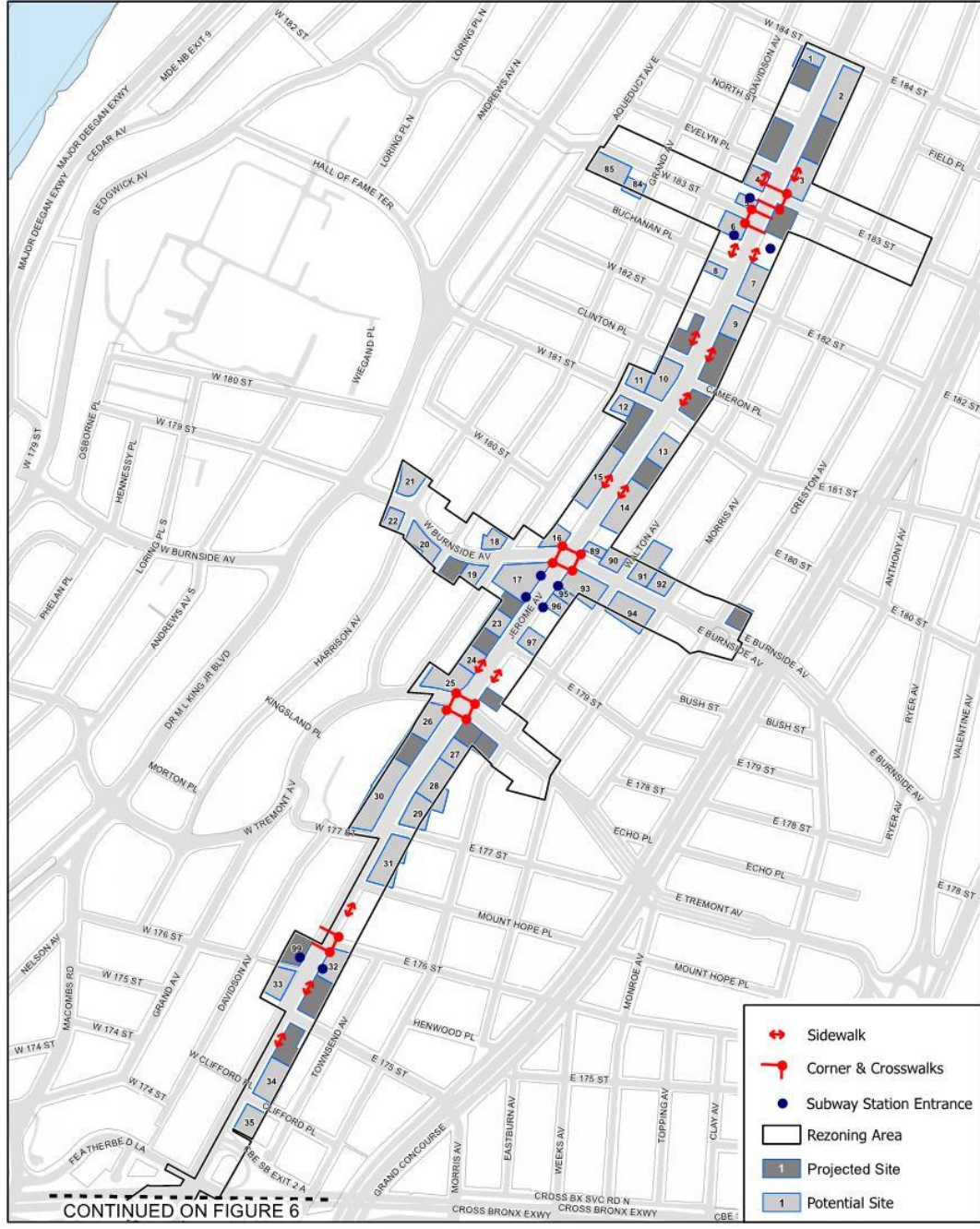
PEDESTRIANS

Per the *CEQR Technical Manual*, detailed pedestrian analyses are generally warranted if a proposed action is projected to result in 200 or more new peak hour pedestrians at any sidewalk, corner reservoir area, or crosswalk. As shown previously in **Table 4: Travel Demand Forecast**

approximately 1,937, 2,137, 2,683, and 2,634 additional pedestrian trips to rezoning area sidewalks and crosswalks during these same periods, respectively.

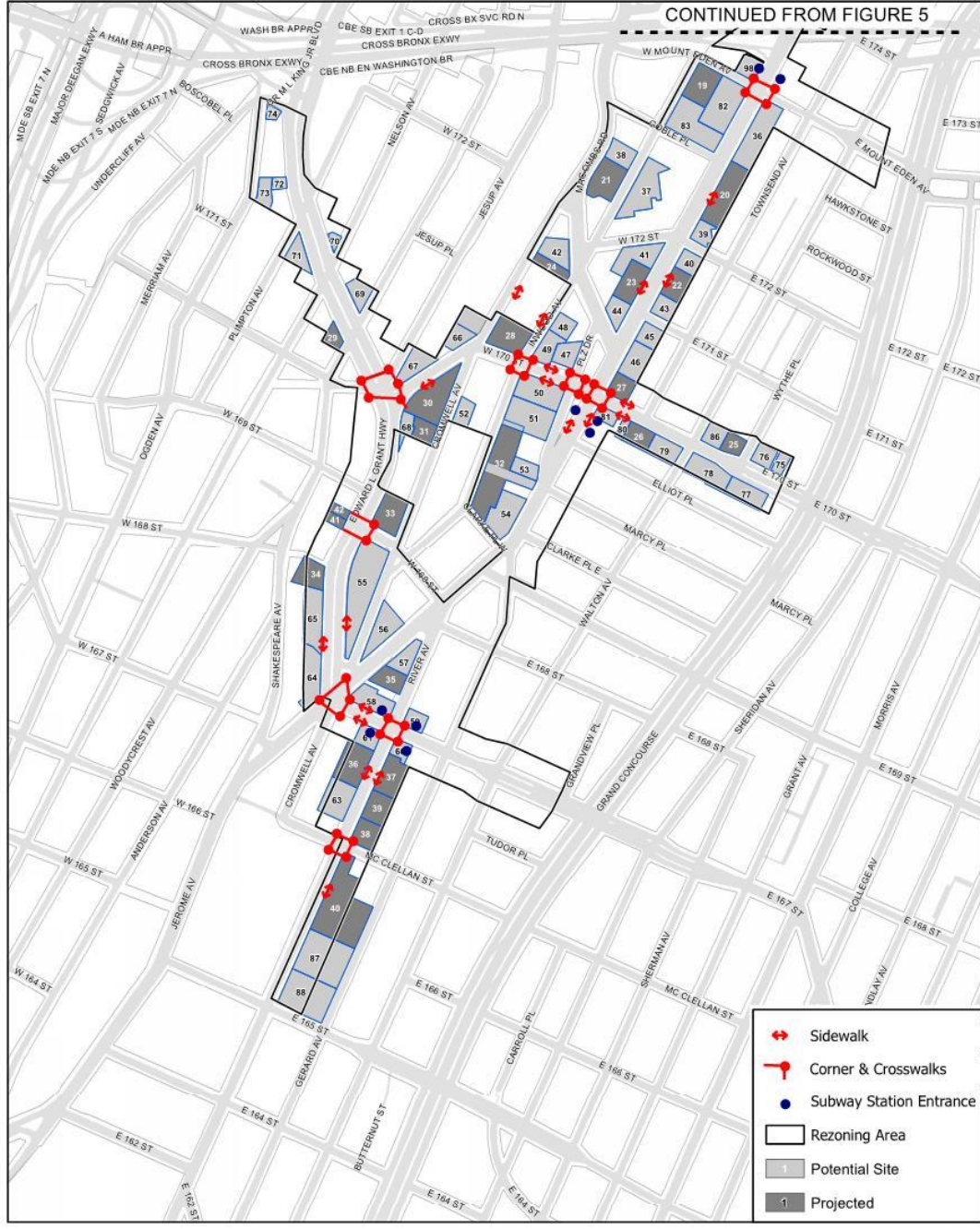
The analysis will focus on sidewalks, corner areas, and crosswalks where new pedestrian demand would be most concentrated and most likely to result in significant adverse impacts. It is expected that during the AM and PM peak periods, pedestrian trips attributable to the Proposed Actions would be concentrated on sidewalks and crosswalks adjacent to the development sites within the rezoning area and along routes to and from the bus stops and subway stations. During the midday period, pedestrian trips would be expected to be dispersed, as people travel throughout the area for lunch, shopping, or errands. As shown in **Figures 5 and 6**, the analysis locations include a total of 33 sidewalks, 37 corner reservoir areas, and 41 crosswalks.





Jerome Avenue Rezoning Proposal

Figure 5
PEDESTRIAN ANALYSIS LOCATIONS - NORTH



N
 0 0.1 0.2 Miles
Jerome Avenue Rezoning Proposal

Figure 6
PEDESTRIAN ANALYSIS LOCATIONS - SOUTH

PARKING

Peak parking demand from commercial and retail uses typically occurs in the weekday midday period and declines during the afternoon and evening. In contrast, peak parking demand associated with residential uses typically occurs during the overnight period.

On- and off-street parking inventory and utilization surveys will be conducted for the weekday overnight period (when residential parking demand typically peaks), the weekday midday period (when parking in a business area is frequently at peak occupancy), and the Saturday midday peak period to document the existing supply and demand for each period. The parking analyses will document the parking supply and utilization within a quarter-mile radius (an acceptable walking distance) of the rezoning area, both with and without the Proposed Actions.

Parking demand generated by the residential component of the Proposed Actions would be forecasted based on 2010-2014 five-year ACS data on average vehicles per household for units. Parking demand generated from all other uses will be derived from the forecasts of daily auto trips from these uses. The forecast of new parking supply with the Proposed Actions will be based on the net change in parking spaces on projected development sites.

Appendix 4

Air Quality Analysis Methodology and Assumptions Memorandum

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To: NYCDP
From: STV Incorporated
Date: August 29, 2016
Project: Jerome Avenue Rezoning EIS
Reference: Air Quality Analysis Methodology and Assumptions

INTRODUCTION

The Proposed Actions, located in the Bronx, New York, would alter traffic volumes and patterns as well as land usage in the study area. As a result of these changes, air quality conditions in terms of localized pollutant levels, could also be affected. To determine the extent of these changes, an air quality analysis will be conducted for the Jerome Avenue Rezoning Environmental Impact Statement (EIS) for both mobile and stationary sources.

The purpose of this memorandum is to describe the air quality analysis approach for the proposed development sites for the Jerome Avenue Rezoning EIS. A total of 146 development sites (45 projected and 101 potential) have been identified within the rezoning area. Under the reasonable worst case development scenario (RWCDs) for the Proposed Actions, the total development expected to occur on the 45 projected development sites under the With-Action condition would consist of a net increase of approximately 3,327,340 sf of total floor area, including net increases of 3,267,288 sf of residential floor area (3,250 dwelling units), 35,575 sf of commercial uses, and 72,272 sf of community facility uses, and net decreases of 47,795 sf of industrial uses and 99 accessory parking spaces. The analysis year is 2026. In addition, based on permit data obtained from the New York City Department of City Planning (NYCDP), numerous industrial source permits in the area are assumed to be active (see **Table 1**) and may need to be analyzed for their potential impact on future residents of the Proposed Actions.

The following outline of methodology and assumptions is based on guidelines contained in the 2014 *CEQR Technical Manual*. The key issues that will be addressed in the air quality study regarding the potential impacts of the Proposed Actions are:

- The potential for significant air quality impacts from increases in the number of project-generated vehicle trips on the already congested local traffic network, and the accompanying reduction in vehicular speeds;
- The potential for emissions from the heating, ventilation and air conditioning (HVAC) systems of the proposed development buildings to significantly impact other proposed development buildings (project-on-project impacts);
- The potential for emissions from the HVAC systems of the proposed development buildings to significantly impact existing land uses;

- The potential combined impacts from HVAC emissions of proposed developments that are of similar height and located in close enough proximity to one another (clusters) to significantly impact existing land uses and other proposed development sites;
- The potential for significant air quality impacts from the emissions of existing large and major emission sources on the proposed residential/commercial developments located in areas that are within 1,000 feet of areas being rezoned to allow new residential/commercial uses;
- The potential for significant air quality impacts on the proposed residential/commercial developments located in areas that are being rezoned to allow new residential/commercial uses from air toxic emissions generated by nearby existing manufacturing and industrial sources; and
- Potential impacts associated with proposed parking facilities on nearby sensitive uses.

This memorandum presents a summary of the methodology and assumptions to be used for both the mobile and stationary source air quality analyses of the Proposed Actions.

MOBILE SOURCE ANALYSIS

Pollutants of Concern

The microscale analysis will evaluate the potential impact that the proposed rezoning will have on localized CO, PM₁₀ and PM_{2.5} levels in the study area as a result of adding project-generated vehicles to currently congested intersections. Selected sites will be analyzed based on the RWCDs. The RWCDs is defined as the full build out of the Proposed Actions that includes both projected and potential development sites.

Dispersion and Emissions Modeling for Microscale Analyses

Dispersion Modeling

The CO mobile source analysis will be conducted using the Tier 1 CAL3QHC model Version 2.0¹ at all intersections identified. The CAL3QHC model employs a Gaussian (normal distribution) dispersion assumption and includes an algorithm for estimating vehicular queue lengths at signalized intersections. CAL3QHC calculates emissions and dispersion of CO from idling and moving vehicles. The queuing algorithm includes site-specific traffic parameters, such as signal timing and delay, saturation flow rate, vehicle arrival type, and signal actuation characteristics to project the number of idling vehicles.

¹ EPA, User's Guide to CAL3QHC, A Modeling Methodology for Predicted Pollutant Concentrations Near Roadway Intersections, Office of Air Quality, Planning Standards, Research Triangle Park, North Carolina, EPA-454/R-92-006.

Following the Environmental Protection Agency (EPA) guidelines², CAL3QHC computations will be performed using a wind speed of 1 meter per second, and the neutral stability class D. In order to ensure that reasonable worst-case meteorology will be used in estimating impacts, concentrations will be calculated for all wind directions and will use an assumed surface roughness of 3.21 meters. The 8-hour average CO concentrations will be estimated from the predicted 1-hour average CO concentrations using a factor of 0.7 to account for the persistence of meteorological conditions and fluctuations in traffic volumes.

If maximum predicted CO concentrations result in a potential impact, a refined (Tier 2) version of the model, CAL3QHCR, will be used at affected intersections. CAL3QHCR is an extended module of the CAL3QHC model which allows for the incorporation of hourly traffic and meteorological data. Five years of meteorological data from LaGuardia Airport and concurrent upper air data from Brookhaven, New York will be used in the refined modeling. Off-peak traffic volumes will be determined by adjusting the peak period volumes by the 24-hour distributions of actual vehicle counts collected at appropriate locations. Off-peak will be determined by adjusting the peak period volumes into the appropriate 24-hour distributions as applicable. Current EPA guidance³ requires the use of CAL3QHCR (Tier 2) for microscale analysis of PM_{2.5}.

Multiple receptors will be modeled at each of the selected sites; receptors will be placed along approach and departure links at spaced intervals at a pedestrian height of 1.8 meters. Based on the City's guidance for neighborhood-scale corridor PM_{2.5} modeling, receptors in that analysis will be placed at a distance of 15 meters from the nearest moving lane at each analysis location.

Emission Factors

Vehicular cruise and idle CO and PM emission factors to be utilized in the dispersion modeling will be computed using EPA's mobile source emissions model, Motor Vehicle Emission Simulator, or MOVES.⁴ This emissions model is capable of calculating engine emission factors for various vehicle types, based on the fuel type (gasoline, diesel, or natural gas), meteorological conditions, vehicle speeds, vehicle age, roadway types, number of starts per day, engine soak time, and various other factors that influence emissions, such as inspection maintenance programs. Project specific traffic data obtained through field studies as well as county-specific hourly temperature and relative humidity data obtained from the New York State Department of Environmental Conservation (NYSDEC) will be used.

In order to account for the suspension of fugitive road dust in the air from vehicular traffic in the local microscale analysis, PM_{2.5} emission rates will include fugitive road dust. However, since the New York City

² *Guidelines for Modeling Carbon Monoxide from Roadway Intersections*, EPA Office of Air Quality Planning and Standards, Publication EPA-454/R-92-005.

³ EPA, *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas*, EPA-420/B-10-040.

⁴ EPA, *MOVES Model, User Guide for MOVES2014*, July 2014.

Department of Environmental Protection (NYCDEP) considers fugitive road dust to have an insignificant contribution on a neighborhood scale, fugitive road dust will not be included in the neighborhood scale PM_{2.5} microscale analyses. Road dust emission factors will be calculated according to the latest procedure delineated by EPA⁵ and the *CEQR Technical Manual*.

Maximum PM_{2.5} concentrations will be predicted using CAL3QHCR Tier 1 analysis. If this analysis results in a potential impact, refinements to the analysis will be implemented using CAL3QHCR Tier 2 analysis. Both Tier 1 and Tier 2 analyses use project specific meteorological data to predict pollutant concentrations, but Tier 1 analysis uses peak-hour traffic to model emissions for the entire day, while Tier 2 analysis uses 24 hours of traffic data to predict pollutant concentrations. The EPA protocol for determining maximum PM_{2.5} concentrations requires producing quarterly emissions factors for five consecutive years of meteorological data. Quarterly (seasonal) and off-peak emission factors can be prepared using additional runs of the MOVES model. This involves creating season-specific meteorological data files for each PM_{2.5} MOVES run. Peak traffic volumes will be used as a worst case scenario to conservatively predict emissions factors for the entire year. If further refinements are necessary, the potential for additional and/or more detailed traffic data to be used within the air quality analysis will be discussed with NYCDOP. Speed data used within the MOVES model will be obtained from information gathered during the traffic data collection program.

Analysis Locations

Carbon Monoxide

It is anticipated that the CAL3QHC model will be used to predict CO concentrations at up to four (4) intersections. Preliminary locations that have been selected based on other studies and historic observations (which identify high levels of congestion at these locations) include:

Background Concentrations

Background concentrations for all pollutants used in the analyses will be determined using the most recent data available from NYSDEC and NYCDEP. Data will be from monitoring stations representative of the county or from the nearest available monitoring station. Applicable averaging times will be determined from referencing the *CEQR Technical Manual* for CO, PM_{2.5}, PM₁₀, NO₂, and SO₂.

CO

The final selection of analysis sites will be completed when trip generation and assignment information is finalized and made available. If the traffic study results in intersections that would surpass the screening limit of 170 vehicle trips, justification for their inclusion will be provided to NYCDOP for review and approval. It is assumed that no more than one (1) intersection in total will be analyzed for CO. The site

⁵ EPA, Compilations of Air Pollutant Emission Factors AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources, Ch. 13.2.1, NC, <http://www.epa.gov/ttn/chief/ap42>, January 2011.

selection will be based on the CEQR intersection screening analysis and the assumption that the selected intersections would surpass the CEQR 170 trip screening limit for this area of the city. The site selection will also take into account existing level of service (LOS), overall Build vehicular volumes, and vehicle classification (% heavy vehicles) during the project's peak hours. The CO analysis will predict one-hour and eight-hour concentrations and compare them to the NAAQS and CEQR CO *de minimis* criteria.

PM_{2.5} and PM₁₀

Jerome Avenue is a very congested traffic corridor and is considered to be a local truck route; therefore, Jerome Avenue may experience high volumes of heavy duty diesel vehicles. The addition of project-generated heavy-duty diesel vehicles (HDDV) and to a lesser degree light-duty gasoline vehicles (LDGV) could impact localized PM emissions. As a result, it is anticipated that an analysis of PM_{2.5} and PM₁₀ will be conducted at up to three (3) "worst case" intersections. The selection will be based on project-generated trip data using the CEQR screening procedure for PM_{2.5} (for conservative purposes, all autos will be considered as LDGT1 in the screening analysis). Should the screening procedure show that the number of project-generated HDDVs will not surpass the screening thresholds, no further analysis of mobile source PM_{2.5} will be conducted. However, it is anticipated that at least three (3) locations will fail the screening procedure. If more than three intersections fail the screening, the selected three worst case locations that result in the highest number of project-generated HDDVs or combination of HDDVs and passenger cars will be selected for analysis. The CAL3QHCR model will be used to predict PM_{2.5} concentrations and an analysis will be conducted to assess whether microscale 24-hour and neighborhood scale annual concentration levels are below CEQR PM_{2.5} *de minimis* criteria and the National Ambient Air Quality Standards (NAAQS). The PM₁₀ intersection analysis will utilize CAL3QHC to determine whether microscale 24-hour concentration levels are below the NAAQS.

Parking Facilities Analysis

No more than the two worst case parking facilities, in terms of size, location, and traffic "ins/outs," will be selected for the analysis of CO and PM_{2.5}. Once each facility is selected for analysis, the peak period with the greatest number of vehicular ins/outs will be studied. Vehicular emissions considered would be from the movement of vehicles within the parking facility and any vehicles idling before exiting. If any of the analyzed intersections are in close proximity to a studied parking facility, the cumulative effect of both sources will be reported. Both ground level and elevated receptors will be considered for locations both outside and inside of proposed buildings, as necessary.

STATIONARY SOURCE ANALYSIS

HEATING, VENTILATION, AND AIR CONDITIONING (HVAC) SYSTEMS

Projected and Potential Development Sites

The potential for emissions from the HVAC systems of individual proposed buildings to result in stationary source pollutants that would significantly impact existing land uses (project on existing impacts) and other proposed buildings (project-on-project impacts) will be conducted utilizing a stepped analysis procedure.

1. Impacts would be initially analyzed using the CEQR nomographic procedures assuming the use of No. 2 fuel oil.
2. If the nomographic screening results fail with the use of No. 2 fuel oil, a more detailed analysis will be conducted utilizing the EPA AERMOD model.
3. If the HVAC systems of the analyzed development sites still show violations of the NAAQS after conducting a dispersion analysis using AERMOD, the nomographic screening procedure will be utilized assuming a cleaner burning fuel (natural gas).
4. If the nomographic screening results fail with natural gas, a more detailed analysis will be conducted utilizing the EPA AERMOD model.
5. In the event that violations of standards are still predicted, an air quality E-designation would be proposed for the site, providing the fuel and/or HVAC exhaust stack restrictions that would be required to avoid a significant adverse air quality impact. Cleaner low NO_x gas burners with emissions concentrations of no more than 30 parts per million (PPM) will be considered, if necessary.

For project-on-project assessments, the nearest existing building and/or proposed building of a similar or greater height will be analyzed as the potential receptor. Since information on the HVAC systems' design is not available, it will be assumed that exhaust stacks would be located three feet above roof height, and are assumed to be located 10 feet from the wall of the adjacent taller building. Where exceedances of thresholds are predicted to occur under this scenario, additional iterations of the analysis are conducted utilizing subsequent setback distances from the wall of the adjacent building. Once the maximum distance is reached (i.e., the edge of the subject rooftop directly opposite the adjacent building property line), then the analysis is run assuming interval increases in stack height. Building receptor locations will be located on every floor and spaced 25 feet (horizontally). The model will be run with and without downwash.

HVAC Cluster Analysis

A cumulative HVAC impact analysis will be performed for projected and/or potential sites with buildings at a similar height located in close proximity to one another (i.e., site clusters). The proposed rezoning

area will be studied to determine the cluster selection. Development cluster sites will be grouped based on the following criteria:

- Density and scale of development;
- Similarity of building height; and
- Proximity to other nearby buildings of a similar height.

Recommendations for the specific cluster locations to be analyzed will be submitted to NYCDOP for approval, after a review of the selected RWCDs. It is assumed that up to three clusters in total will be analyzed.

The HVAC cluster analysis will be first performed using the most recent version of the AERSCREEN Model.

The AERSCREEN model is a screening version of the AERMOD refined model and will be used for determining the maximum concentrations from a single source using predefined meteorological conditions. The AERSCREEN analysis will be performed to identify potential impacts of SO₂, NO₂, PM₁₀, and PM_{2.5} emissions. An estimate of the emissions from the HVAC systems will be made based on the proposed development size under the RWCDs, type of fuel used, and type of construction with fuel consumption rates shown below:

- For residential developments, 58.5 ft³/ft²-year and 0.43 gal/ft²-year would be used for natural gas and fuel oil, respectively; and
- For commercial developments, 45.2 ft³/ft²-year and 0.21 gal/ft²-year would be used for natural gas and fuel oil, respectively.

Short-term factors will be determined by using peak hourly fuel consumption estimates for heating, hot water, and cooling systems.

Emission factors for each fuel would be obtained from the EPA Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. The SO₂ emissions rates will be calculated based on a maximum fuel oil sulfur content of 0.0015 percent (based on use of ultra-low sulfur No. 2 oil) using the appropriate AP-42 formula.

The AERSCREEN model will be used to predict impacts over a 1-hour average using default meteorology assuming stability class D. In order to predict pollutant concentrations over longer periods of time, EPA-referenced persistence factors would be used consisting of 0.6 and 0.1 for the 24-hour and annual average periods, respectively.

The distance from the source clusters to the nearest buildings will be used in the modeling analysis. The analysis will examine existing buildings or other projected or potential development sites which are of a similar or greater height than the source cluster.

The results of the analysis will be added to background concentrations to determine whether impacts are below ambient air quality standards. The maximum concentrations from a cluster will be predicted for both fuel oil and natural gas types. In the event that an exceedance of a standard for a specific pollutant is predicted with either No. 2 fuel oil or natural gas, a refined modeling analysis using the AERMOD model will be performed. Since the AERMOD model is capable of analyzing impacts from multiple pollutant sources, one model run will be conducted assuming that all buildings within the cluster would impact the nearest building. In the event that violations of standards are predicted, an air quality E-designation would be proposed for the site, describing the fuel and/or HVAC exhaust stack restrictions that would be required to avoid a significant adverse air quality impact.

Large and Major Sources

A review of NYSDEC Title V permits and the EPA Envirofacts database will be performed to identify any federal or state-permitted facilities. Existing large and major sources of emissions (i.e., sources having a Title V or State Facility Air Permit) within 1,000 feet of the development sites will be identified. An analysis of these sources will be performed to assess their potential effects on projected and potential development sites. Predicted criteria pollutant concentrations will be predicted using the EPA AERMOD model. Results will be compared with NAAQS for NO₂, SO₂, and PM₁₀, as well as the *de minimis* criteria for PM_{2.5}. The latest five years of meteorology (assumed to currently be 2011-2015) will be utilized.

Industrial Source Analysis

NYCDCP has recently identified potential process and manufacturing sources that are potentially located within a radius of 400 feet of the Jerome Avenue Rezoning development sites. As shown in **Table 1**, several industrial source permits have been identified. It is anticipated that NYCDCP will identify additional sources that will be included in the analysis. As per the scope of work, STV will review the DEP permit data received from NYCDCP to determine which industrial sources are within 400 feet of a projected or potential development site. Any industrial sources beyond 400 feet of a projected or potential development site will be excluded from the analysis. In addition, the analysis excludes industrial sources located at projected development sites since the Proposed Actions assume that all such sites would be redeveloped. However, for potential development sites, the industrial analysis will be performed using two methods, as follows:

1. Assuming the site is developed, in which case the industrial source is not assumed to be operating in the Build Condition. In this case, potential air quality impacts from other industrial sources in the study area will be analyzed to evaluate their potential effects on the development site.
2. Assuming the site is not developed, in which case the industrial source is assumed to be operating in the Build Condition, its potential effects on other proposed development sites will be determined.

Once industrial source locations are confirmed to be within 400 feet of the Proposed Actions, a field survey will be performed to confirm the operational status of the sites identified in the permit search, and to identify if any additional sites have sources of emissions that would warrant an analysis. If any such sources are identified, further consultation will be made with NYCDPC to determine specific generic procedures for estimating emissions from these sources.

Cumulative analysis for each toxic pollutant from these auto and truck facilities will be conducted from all sources. NYSDEC Annual Guideline Concentration (AGC) and Short-term Guideline Concentration (SGC) will be used as the thresholds to determine impact significance. If an initial screening assessment predicts exceedances of an AGC or SGC, a refined modeling analysis using the AERMOD model will be performed in association with the five-year meteorological data to determine if significant air quality impacts on proposed sensitive development sites would result from existing toxic emissions sources.

Potential cumulative impacts of multiple air contaminants will be determined based on the EPA's Hazard Index Approach for non-carcinogenic compounds and using the EPA's Unit Risk Factors for carcinogenic compounds. Both methods are based on equations that use EPA health risk information (established for individual compounds with known health effects) to determine the level of health risk posed by specific ambient concentrations of that compound. The derived values of health risk are additive and can be used to determine the total risk posed by multiple air contaminants.

Table 1: Received Industrial Source Permits

	Permit ID	Block	Lot	Address	Analysis Required (Y/N)
1	PA000277P	02864	00021	1349 Inwood Avenue	Y
2	PA007599J	02864	00001	1297 Inwood Avenue	Y
3	PA021775K	02864	00021	1349 Inwood Avenue	Y
4	PA025988M	02465	00050	117 East 167th Street	N
5	PA026088L	02465	00050	118 East 167th Street	N
6	PA052591H	02861	00140	1829 Jerome Avenue	Y
7	PA052691P	02861	00140	1829 Jerome Avenue	Y
8	PA090288M	02862	00097	1941 Jerome Avenue	N
9	PA090388J	02862	00097	1941 Jerome Avenue	N
10	PB004507R	02872	00170	1455 Cromwell Avenue	Y
11	PB014113Y	02855	00065	1271 Jerome Street	Y
12	PB017814L	03197	00033	2285 Jerome Avenue	Y
13	PB025810R	02857	00045	1439 Inwood Avenue	Y
14	PB026210R	02857	00064	25 West 170th Street	Y
15	PB026710H	02864	00027	1368 Cromwell Avenue	Y
16	PB038003P	02846	00021	1552 Jerome Avenue	Y
17	PB038113J	02465	00050	117 East 167th Street	N
18	PB039611Y	03187	00007	2314 Jerome Avenue	Y
19	PB031403	02842	0051	130 East 170 th Street	Y
20	PA063586	03216	0064	1987 Dr. M L King, Jr. Boulevard	N
21	PA058598	03182	0028	58 East 183rd Street	Y
22	PB042602	02863	0032	8 West Burnside Avenue	Y
24	PA006997	02506	0001	1177 Jerome Avenue	Y

Appendix 5

Noise Analysis Methodology and Assumptions Memorandum

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To: NYCDP
From: STV Incorporated
Date: August 29, 2016
Project: Jerome Avenue Rezoning EIS
Reference: Noise Analysis Methodology and Assumptions

A noise analysis will be conducted for the Jerome Avenue Rezoning Environmental Impact Statement (EIS), and will primarily involve the assessment of project-related mobile sources. The purpose of this memorandum is to describe the noise analysis approach for the proposed development sites for the Jerome Avenue Rezoning EIS. A total of 146 development sites (45 projected and 101 potential) have been identified within the rezoning area. Under the reasonable worst case development scenario (RWCDs) for the Proposed Actions, the total development expected to occur on the 45 projected development sites under the With-Action condition would consist of a net increase of approximately 3,327,340 sf of total floor area, including net increases of 3,267,288 sf of residential floor area (3,250 dwelling units), 35,575 sf of commercial uses, and 72,272 sf of community facility uses, and net decreases of 47,795 sf of industrial uses and 99 accessory parking spaces. The analysis year is 2026.

The following outline of procedures and assumptions is based on guidelines contained in the 2014 *CEQR Technical Manual*.

It is assumed that noise impacts could result primarily from one of two sources:

1. Vehicular noise from project-generated traffic on sensitive receptors in the community
2. Ambient noise impacts (from existing local and highway traffic, ventilation equipment, trains, stationary sources, etc.) on proposed uses (projected and potential development sites).

Given the high ambient noise levels from existing sources including Jerome Avenue, the Major Deegan Expressway, the elevated IRT train line along Jerome Avenue, as well as high vehicular volumes on many of the major streets (e.g., East Tremont Avenue, Edward L. Grant Highway, and East 170th Street), the trip generation resulting from the incremental development of the Proposed Actions would likely result in a low level of additional noise. The exceptions to this may occur on other less traveled streets in the project area. While these sites will be examined, it is assumed that the greatest concern for project-generated impacts would be related to the impact of existing and future noise generators on future residents.

Noise Monitoring

Mobile Sources

To determine baseline noise levels within the study area, noise monitoring is proposed. Once the RWCDs is available, locations will be selected based on their proximity to projected and potential development sites as well as their potential to experience a doubling in traffic volume, or Passenger Car Equivalents (PCEs), from project-induced traffic. Care will also be taken to select sites that would result in the most representative assessment of the existing noise environment. Monitoring will be conducted during the peak Weekday AM (7-9 AM), Midday (11:30-12:30 PM), early PM (2:30-3:30 PM) for receptors near school locations, PM (5-6 PM), and Saturday midday (12-5 PM) for locations near destination retail stores. For the Saturday midday period, noise monitoring will only be conducted for the peak hour identified between the 12 PM and 5 PM traffic data collection hours. Noise monitoring will be conducted for 20-minute intervals. For elevated receptor locations, noise monitoring will be conducted for an entire one-hour period. No more than two sites will be monitored for a 24-hour period assuming access and security is available. Noise monitoring will include the use of A-weighted sound levels, and the L1, L10, L50, L90, Lmin, Lmax and LEQ noise descriptors. It is also proposed that the aircraft flight noise would not be removed from the noise measurements. As a result, acceptable building interior noise levels to be recommended would take the aircraft noise component into account. Furthermore, publicly available LaGuardia Airport future noise contours (FAA contour maps) developed in terms of day and night average noise levels will also be referenced in evaluating potential aircraft noise impacts on the proposed development sites.

The instruments used for the monitoring will be Type I Sound Level Meters (SLM) according to ANSI Standard S1.4-1983 (R2006). Each SLM will have a valid laboratory calibration certificate when measurements occur. All measurement procedures will be based on the guidelines outlined in ANSI Standard S1.13-2005.

The proposed noise monitoring sites are listed below in **Table 1** and **Table 2**. Noise locations were selected based on potential and proposed locations on the RWCDs and existing field conditions. They represent approximate locations where field personnel will conduct monitoring.

Table 1: Proposed Street Level Noise Monitoring Locations

Receptor	Location
1	River Avenue and East 167 th Street
2	River Avenue and East 165 th Street
3	Edward L. Grant Highway between Jerome Avenue and West 169 th Street
4	Jerome Avenue (west side) and West 168 th Street
5	Corner of Jerome Ave and E. Clark Place, north of Jerome Avenue, Gerard Avenue and E. Clark Place Triangle
6	Edward L. Grant Highway between Jesup Avenue and Shakespeare Avenue
7	Cromwell Avenue between West 169 th Street and West 170 th Street
8	East 170 th Street between Townsend Avenue and Walton Avenue
9	Inwood Avenue between West 170 th Street and Macombs Road
10	Jerome Avenue and West 172 nd Street. (northwest corner)
11	West Mount Eden Avenue between Jerome Avenue and Inwood Avenue
12	Jerome Avenue between Clifford Place East and East 175 th Street
13	Jerome Avenue between East 177 th Street and East Tremont Avenue
14	East Burnside Avenue between Walton Avenue and Morris Avenue
15	Jerome Avenue and East 182 nd Street
16	West 183 rd Street between Grand Avenue and Davidson Avenue
17	East Tremont Avenue between Jerome Avenue and Walton Avenue
18	East Tremont Avenue between Creston Avenue and Grand Concourse

Table 2: Proposed Elevated Noise Monitoring Sites (assuming access is available)

Receptor	Location
19	River Avenue between East 167 th Street and East 168 th Street (Elevated)
20	Jerome Avenue between East 172 nd Street and East 171 st Street (Elevated)
21	Jerome Avenue and Goble Place (24-Hour Elevated Location)

Rail Sources

The existing elevated IRT train line along Jerome Avenue is within close proximity to many of the proposed development sites. Where possible, elevated receptors may be examined near the elevated train line **assuming that a secure and accessible location is available, otherwise street level locations will be utilized.** As noise levels in the area of Jerome Avenue are dominated by the elevated IRT train line, it is anticipated that measurements from one or two monitoring locations would be applicable to multiple

sites along the Jerome Avenue corridor as well as other roadway corridors similarly affected. Monitoring locations, measuring train noise specifically, will be measured for a full one-hour period.

Stationary Sources

It is not anticipated that a significant singular source of stationary noise will be identified and, therefore, no monitoring of stationary sources will be conducted. In addition, it is assumed that building mechanical systems (i.e., HVAC systems) for all buildings associated with the project will be designed to meet all applicable noise regulations (i.e., Subchapter 5, Sec. 24-227 of the New York City Noise Control Code and the New York City Department of Buildings Code).

Detailed Analysis Procedures

Vehicular Noise

The selected noise monitoring locations will be used to assess the noise impacts of project-induced vehicles. For traffic-induced noise impacts, projected increases in noise will be based on the *CEQR Technical Manual*, depending on the traffic noise levels projected for the No-Action condition. A screening analysis will be conducted to demonstrate that the Proposed Actions will not result in any exceedances of noise guidelines.

Ambient Noise Analysis

Based on predicted With-Action L_{10} noise levels, the noise analysis will result in a determination of the required attenuation values for each of the proposed development sites.

- Initially, the selected noise monitoring locations will be assessed to determine what their future L_{10} noise levels will be.
- Future noise from traffic will be calculated by converting traffic into PCEs for existing, No-Action and With-Action conditions, using logarithmic calculations and PCE traffic volumes.
- Predicted L_{eq} noise levels will be converted to L_{10} noise levels. The conversion assumes the difference in decibels between the L_{eq} and L_{10} for monitored noise levels will be the same relative to future noise levels. The calculation to determine the decibel difference will be conducted between existing and No-Action traffic conditions and between No-Action and With-Action traffic conditions.
- Each projected and potential development site will then be assigned a future noise level based on their proximity to one of the worst case monitored noise sites.
- Based on future With-Action noise levels, the window/wall attenuation category would be selected to provide acceptable interior noise levels.

Models for Analysis

The logarithmic proportional modeling procedure will be used to predict future L_{eq} noise levels. No modeling with the FHWA's TNM model is anticipated. For the proposed development sites, it is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and no detailed analysis of potential stationary source noise impacts due to outdoor mechanical equipment will be performed. However, if stationary source analyses are required for existing loud sources, sound levels at nearby sensitive receptors will be predicted using the distance attenuation equation provided in the *CEQR Technical Manual*.

Analysis Periods

The analyses of mobile sources will predict future noise levels for the existing, No-Action condition, and With-Action condition. One build year will be studied, which has been tentatively identified by the New York City Department of City Planning as 2026. The peak hours will be weekday AM, Midday, early PM, PM, and Saturday midday.

Mitigation

If the analysis of future noise results in any of the studied locations exceeding the CEQR thresholds, mitigation measures in the form of window/wall attenuation will be proposed. Mitigation measures will be based on the required level of attenuation.

Appendix 6
Construction-Related Transportation Analysis Methodology
Memorandum

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To: NYCDPC
From: STV Incorporated
Date: August 29, 2016
Project: Jerome Avenue Rezoning EIS
Reference: Construction-Related Transportation Analysis Methodology

Construction-Related Transportation

This memorandum describes the methodology used to evaluate the transportation effects associated with the Proposed Actions' construction-related activities. The Proposed Actions would result in construction within the rezoning area over a ten-year period, replacing existing and anticipated No-Action uses on projected development sites. During construction periods, construction at projected development sites ("construction sites") would generate trips by workers traveling to/from the construction sites, as well as trips associated with the movement of materials and equipment. Given typical construction hours, it is expected that worker trips would be concentrated in the early morning and mid-afternoon periods on weekdays, and so these worker trips would not be expected to represent a substantial increment during the area's peak travel periods.

Traffic

The average daily on-site construction workers and trucks would be forecasted for each projected development site under both the No-Action and With-Action condition.¹ The net incremental demand attributable to construction associated with the Proposed Actions is determined by comparing the With-Action estimates to the No-Action estimates. The "peak period" (of a particular year) for generated construction trips would be selected for analysis; similarly, a "reasonable worst-case" analysis period (of a particular year) would be selected to assess the cumulative traffic impacts associated with construction trips occurring when operational trips (from completed portions of the rezoning area) would also be occurring.

The modal split and vehicle occupancy rates for construction workers would be based on available survey data from recent construction sites. A forecast of hourly trips during the peak construction period would be determined from a temporal distribution based on typical work shift allocations and conventional arrival/departure patterns for construction workers. Each worker vehicle would be assumed to arrive in the morning and depart in the afternoon or early evening; whereas, truck deliveries would occur throughout the construction day. To avoid congestion and ensure that materials are on-site for the start

¹ NYCDPC will provide a reasonable worst-case schedule of construction activities and phases for No-Action and With-Action conditions. STV will develop worker and truck projections based on detailed construction workforce and delivery projections described in Appendix F of NYCDPC's *East New York Rezoning FEIS*.

of each shift, it is expected that construction truck deliveries would typically peak during the hour before the regular day shift, overlapping with construction worker arrival traffic. Each truck delivery would result in two truck trips during the same hour (one inbound and one outbound). For analysis purposes, truck trips would be converted into Passenger Car Equivalents (PCEs) based on one truck being equivalent to an average of two PCEs.

The year selected for peak construction vehicle trips would be compared to the proposed operational trips that would be generated with full build-out of the rezoning area in 2026. The AM and PM peak hours of construction trips may differ from the AM and PM study area peak hours. The vehicle trips during the AM and PM peak hours for both construction and operational traffic would be compared. If the trips generated in the peak construction year are less than the trips generated by the full build-out, it is expected that traffic conditions will generally be better than the Proposed Actions and, consequently, there would be no significant adverse traffic impacts. If the generated construction traffic is similar to or greater than the full build-out project generated traffic (operational traffic), mitigation measures identified for operational traffic impacts would be expected to be effective at mitigating any potential impacts from construction trips. The same comparison would be performed for the cumulative construction and operational traffic year to the full build-out.

The number of construction-related vehicle trips is assumed to be less than the full-Build operational trip increment. Therefore, no detailed intersection capacity analyses were assumed to be required.

Temporary street lane and sidewalk closures would be anticipated adjacent to construction sites, similar to other construction projects in New York City. No re-routing of traffic is anticipated during construction activities and all moving lanes on streets are expected to be available.

Transit and Pedestrians

The estimated number of transit and walk trips would be based on the modal split for the average daily on-site construction workers forecast for each development site under both the No-Action and With-Action conditions. Similarly, the transit and pedestrian trips generated in the peak construction travel demand year and the reasonable worst-case analysis period would be compared to the full build-out of the Proposed Actions. The construction sites are located in an area that is well served by public transportation, with three subway routes and nine local NYCT bus routes. It would be expected that the majority of the construction workers would arrive and depart in the peak hour before and after each shift. Given that these transit trips would be distributed among multiple subway stations and bus routes in proximity to projected development sites throughout the rezoning area, it is unlikely that this number of incremental trips would exceed the 200-trip *CEQR Technical Manual* analysis threshold for a subway station or the 50-trip threshold for a bus analysis (per route, per direction) in either construction peak hour.

Construction pedestrian trips would be widely distributed among the projected development sites that would be under construction and would primarily occur outside of the weekday AM and PM commuter

peak periods and weekday midday peak period when area pedestrian facilities typically experience their greatest demand. It is therefore unlikely that any single sidewalk, corner or crosswalk would experience 200 or more peak-hour trips (the threshold below which significant adverse pedestrian impacts are considered unlikely to occur based on *CEQR Technical Manual* guidelines). As such, significant adverse transit or pedestrian impacts are not anticipated in the peak construction period or the worst-case analysis period. In the instance where the construction transit or pedestrian trips generated would be greater than the full-build out, it is expected that the mitigation measures identified for operational impacts would also be effective at mitigating any potential impacts from construction trips; therefore, no detailed transit and pedestrian analyses are anticipated.

Parking

The maximum daily parking demand from project site construction workers would be based on the number of expected construction workers on-site daily who travel to the area by private auto, with an average vehicle occupancy rate applied. The majority of construction workers would be expected to park on-street. The number of available on-street parking spaces identified within a ¼-mile radius of the rezoning area would be compared to the construction parking demand to determine if a significant adverse parking impact would occur.

Appendix 7
Construction-Related Air Quality Analysis Methodology
Memorandum

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To: NYCDP
From: STV Incorporated
Date: August 29, 2016
Project: Jerome Avenue Rezoning EIS
Reference: Construction-Related Air Quality Analysis Methodology

Construction-Related Air Quality

Construction activities for the proposed project would last for more than two years, and so a quantitative assessment of construction-related air quality will be conducted for the Jerome Avenue Rezoning EIS. Emissions of air quality pollutants from construction would result from on-site construction machinery and activity as well as the movement of construction-related vehicles (i.e., worker trips, and material and equipment trips) on the surrounding roadways. The analysis will be based on the anticipated schedule of construction activities and phases which will be provided by the New York City Department of City Planning (DCP). The general methodology for stationary source modeling (regarding model selection, receptor placement, and meteorological data) presented in the “Air Quality Analysis Methodology and Assumptions” memo was followed for modeling dispersion of pollutants from on-site sources during the construction period. Additional details relevant only to the construction air quality analysis methodology are presented in the following section.

Pollutants of concern with respect to construction emissions include nitrogen oxides (NO_x), particulate matter (PM) and CO. Most heavy equipment used in construction is powered by diesel engines that have the potential to produce relatively high levels of nitrogen oxides (NO_x) and particulate matter (PM). Fugitive dust generated by construction activities is also a source of PM. Gasoline engines produce high levels of carbon monoxide (CO). Since ultra-low-sulfur diesel (ULSD) fuel would be used for all diesel engines used in the construction under the Proposed Actions, sulfur oxides (SO_x) emitted from those construction activities would be negligible.

Construction Periods for Study

The pollutant PM_{2.5} will be utilized for determining the worst-case periods, because the ratio of predicted PM_{2.5} incremental concentrations to impact criteria due to construction activities is higher than for other pollutants. Generally, emission patterns of PM₁₀ and NO₂ would follow PM_{2.5} emissions, since their emission rates are related to the sizes of diesel engines. CO emissions may have a somewhat different pattern but generally would also be highest during periods when the most construction activity would occur. To determine which construction years constitute the worst-case periods for the pollutants of concern, construction-related emissions will be calculated throughout the duration of construction from all of the projected development sites on an annual average and peak day average basis for PM_{2.5}.

Selection of Sites for Study

Emissions profiles were generated for those projected development sites with construction durations of more than two years. In addition, to determine cumulative effects of sites with less than two years, emissions profiles will also be generated for all projected development sites to determine the highest cumulative emission potential.

Based on the resulting multi-year profiles of annual average and peak day average emissions of PM_{2.5}, and the proximity of the construction activities at each projected development site to each other and to nearby sensitive receptor locations (i.e., residences, publicly accessible open spaces, etc.), worst-case short-term and annual periods for construction will be identified for dispersion modeling of annual and short-term (i.e., 24-hour, eight-hour, and one-hour) averaging periods, including annual and 24-hour PM_{2.5}, 24-hour PM₁₀, one-hour and eight-hour CO, and annual NO₂ average periods.

The construction-related air quality assessment will be conducted for two peak short-term periods and one peak annual period. Only one worst-case location will be analyzed for each of the peak periods identified.

Dispersion Modeling

Dispersion modeling for construction emissions at selected locations will be conducted utilizing the USEPA AERMOD model. In general, parameters governing the use of the model will be similar to those described in the "Air Quality Analysis Methodology and Assumptions" memo. Specific assumptions tailored for the construction-related dispersion modeling of the relevant air pollutants are listed below:

- Emission rates of each pollutant from relevant sources will be estimated for each type of construction activity. Short-term emission estimates were based on peak period activity levels at each site. These emission estimates will be used to estimate short-term (i.e., 24-hour, eight-hour, and one-hour) pollutant concentrations (for comparison to short-term NAAQS). Annual average activity levels would be used to estimate annual concentrations (for comparison to annual NAAQS). Engine emissions profiles would be prepared by multiplying the emission rates for each piece of equipment by the number of engines, the work hours per day, and fraction of the day each engine would be expected to work during each month of construction;
- For the short-term model scenarios (predicting concentration averages for periods of 24 hours or less), all stationary sources, such as cranes, concrete pumps, or generators, which would idle in a single known location while unloading, will be simulated as point sources. However, if their specific locations are not known, they will be modeled as area sources. Other engines, which would move around the site on any given day, will be simulated as area sources. For periods of eight hours or less (less than the length of a shift), it was assumed that all engines would be active simultaneously. For the annual emissions analysis, all sources would move around the site throughout the year and will therefore be modeled as area sources;

- Sensitive receptors identified for analysis will include locations where the maximum concentration is likely to occur and where the general public is likely to have access. As a result, receptors were distributed along sidewalks spaced 25 feet apart with a height of 1.8 meters (6 feet) and at elevated building façade locations representative of intake vents, operable windows and/or balconies;
- The most recent five year period (2011 to 2015) available of representative hourly meteorological data from LaGuardia Airport (LGA) was used in the analysis along with upper air data from Brookhaven;
- Fugitive dust emission factors for demolition, excavation, truck loading, and re-entrained dust were based on the equations and factors recommended in EPA's AP-42 Report "Compilation of Air Pollutant Emission Factors" Sections 13.2.3.1/2/3, and it will be assumed that the planned control of fugitive emissions would reduce PM emissions from such operations by 50 percent;
- Small equipment, such as lifts, compressors, welders, and pumps, will use electric engines that operate on grid power instead of diesel power engines (i.e, no emissions);
- During construction, the Proposed Actions may result in off-site mobile source emissions resulting from increases in and/or the redistributions of traffic. On-road emissions from traffic related operations adjacent to the construction sites will be included with the on-site dispersion analysis in order to address all local project-related emissions cumulatively;
- Applicable background concentrations are added to the modeling results to obtain the total pollutant concentrations at each receptor site.
- The sites cluster selection for dispersion modeling will be based on the construction schedule and the proximity of the sites relative to the nearest sensitive receptors.

Emission Reductions Assumptions

In accordance with all applicable laws, regulations, and building codes, several emissions reduction measures would be applied to reduce pollutant emissions during construction. These include the following dust suppression measures and the idling restriction for on-road vehicles:

- **Dust Control.** All necessary measures will be implemented to ensure that the New York City Air Pollution Control Code regulating construction-related dust emissions is followed. For example, truck routes within the site would be watered as needed to avoid the re-suspension of dust. All trucks hauling loose material will be equipped with tight-fitting tailgates and their loads securely covered prior to leaving the construction site. Water sprays will be used to ensure that materials are dampened as necessary to avoid the suspension of dust into the air.
- **Idling Restriction.** In addition to adhering to the local law restricting unnecessary idling on roadways, on-site vehicle idle time will also be restricted to three minutes for all equipment and vehicles that are not using their engines to operate a loading, unloading, or processing device (e.g., concrete mixing trucks) or otherwise required for the proper operation of the engine. Additional emissions reduction measures are available to minimize air pollutant emissions during construction. In addition to the required laws and regulations, for projected development sites with construction durations of more

than two years and construction start times of 2022 or earlier, an emissions reduction program for all construction activities would be implemented to the extent practicable, consisting of the following components (commitments relating to the items set forth below will be included as part of construction contract specifications):

- **Utilization of Newer Equipment.** The United States Environmental Protection Agency (EPA)'s Tier 1 through 4 standards for non-road engines regulate the emission of criteria pollutants from new engines, including PM, CO, NO_x, and hydrocarbons (HC). All non-road construction equipment with a power rating of 50 hp or greater would meet at least the Tier 3 emissions standards and the use of Diesel Particulate Filters (DPFs). Tier 3 NO_x emissions range from 40 to 60 percent lower than Tier 1 emissions and considerably lower than uncontrolled engines. Given the timeframe of the construction of the Proposed Actions, equipment meeting the more restrictive Tier 4 (model year 2008–2015 or newer) would be common and in wide use, and expected to be part of the contractors fleet. The combination of Tier 4 and Tier 3 engines with DPFs, required in all publicly funded projects, will achieve DPM reduction of at least 90% when compared to older uncontrolled engines.
- **Best Available Tailpipe Reduction Technologies.** Non-road diesel engines with a power rating of 50 horsepower (hp) or greater and controlled truck fleets (i.e., truck fleets under long-term contract with the project), including but not limited to concrete mixing and pumping trucks, would utilize the best available tailpipe (BAT) technology for reducing DPM emissions. DPFs have been identified as being the tailpipe technology currently proven to have the highest reduction capability. Construction contracts would specify that all diesel non-road engines rated at 50 hp or greater would utilize DPFs, either installed by the original equipment manufacturer (OEM) or retrofitted. Retrofitted DPFs must be verified by EPA or the California Air Resources Board (CARB). Active DPFs or other technologies proven to achieve an equivalent reduction may also be assumed.

Appendix 8
Construction-Related Noise and Vibration Analysis
Methodology Memorandum

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To: NYCDP
From: STV Incorporated
Date: August 29, 2016
Project: Jerome Avenue Rezoning EIS
Reference: Construction-Related Noise and Vibration Analysis Methodology

Construction-Related Noise and Vibration

Construction activities for the proposed project would last for more than two years, and so a quantitative construction noise and vibration assessment will be conducted as part of the Jerome Avenue Rezoning EIS. Noise and vibration from construction would result from on-site construction machinery and activity as well as the movement of construction-related vehicles (i.e., worker trips, and material and equipment trips) on the surrounding roadways. It is assumed that the analysis will be based on the reasonable worst-case for the anticipated schedule of construction activities and phases which will be provided by the New York City Department of City Planning (DCP).

Noise

Construction noise analyses for the Jerome Avenue Rezoning EIS will be conducted in a manner that is generally consistent with the construction noise analyses conducted for the *East New York Rezoning FEIS*. Below is a list of relevant procedures and assumptions applicable to the Jerome Avenue Rezoning analysis:

- The peak construction years utilized for all analyses will be based on quarterly estimates of project truck trips and construction workers on site per day;
- The two largest projected development sites will be selected for assessment. Two peak periods and two off-peak periods will be utilized for the assessment.
- One typically sized “projected” development sites will be assessed as representative. One peak period and one off-peak period will be utilized for the assessment of the three major construction stages (i.e., excavation/foundation work, superstructure/façade work, and interior finishing work)
- Construction impacts will be determined based on the following *CEQR Technical Manual* criteria:
 - If the No-Action noise level is less than 60 dBA Leq(1), a 5 dBA Leq(1) or greater increase would be considered significant;
 - If the No-Action noise level is between 60 dBA Leq(1) and 62 dBA Leq(1), a resultant Leq(1) of 65 dBA or greater would be considered a significant increase;
 - If the No-Action noise level is equal to or greater than 62 dBA Leq(1), or if the analysis period is a nighttime period (defined in the CEQR criteria as being between 10:00 p.m. and 7:00 a.m.), the incremental significant impact threshold would be three dBA Leq(1);

- Based on the impact results of the construction analysis for the “typical” representative analysis location (i.e. distance to impact), impacts to receptors nearby other projected sites will be determined.
- For the purposes of the construction analyses, peak hour noise monitoring collected for the operational noise analysis will be used to determine existing conditions. The applicable monitoring site locations will be selected for approval by DCP once construction details regarding schedule, activity and phasing are made available. For the sites selected for assessment (two largest sites and one typical site), representative peak hour noise monitoring will be conducted during the 6AM – 7AM peak construction hour. Monitoring will be conducted for a 20-minute time period.
- Noise analysis will include a model validation procedure at selected noise monitoring sites for the prediction of existing noise levels using existing traffic. Adjustments will be incorporated into the model for prediction at nearby receptor locations associated with each noise monitoring site.
- Analysis results will include DCP approved noise reduction measures and path controls.
- The Cadna A Model will be utilized to determine noise equipment source levels and to assess the potential for noise impact at sensitive ground level, and elevated receptors nearby the project construction site. Noise equipment sound power levels for each of the studied pieces of equipment will be derived within Cadna A utilizing Lmax reference sound levels and distances (see CEQR TM Table 22-1) as a basis for conversion. Construction noise emissions from trucks will be modeled using the TNM module within Cadna A. Modeled receptors would be representative of both ground level and elevated locations.

Vibration

Potential impacts from construction-related vibration will also be assessed with respect to human annoyance and structural building damage. Properties of greatest concern would be those buildings located immediately adjacent or across the street from projected development sites. The Federal Transit Administration (FTA) general assessment methodology and criteria will be used for the analyses. It is assumed that construction schedule, phasing, activity and equipment data will be utilized for the assessment, in particular with respect to activities such as impact pile driving and demolition, if applicable, which represent the two most severe vibration causing activities.

Appendix 9

Response to Comments on the Draft Scope of Work

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Response to Comments on the Draft Scope of Work for the Draft Environmental Impact Statement for

JEROME AVENUE REZONING

A. INTRODUCTION

This document summarizes and responds to comments on the Draft Scope of Work, issued on August 29, 2016, for the Proposed Jerome Avenue Rezoning (the Proposed Actions). Oral and written comments were received during the public meeting held by the New York City Department of City Planning on September 29, 2016 at Bronx Community College. Written comments were accepted through the close of the public comment period, which ended at 5:00 P.M. on October 10, 2016. Appendix 10 contains the written comments received on the Draft Scope of Work. A Final Scope of Work was issued on August 18, 2017, incorporating comments received on the Draft Scope of Work, where relevant and appropriate, as well as other background and project updates that were made subsequent to publication of the Draft Scope of Work.

Section B lists the elected officials, organizations, and individuals that provided relevant comments on the Draft Scope of Work. Sections C and D contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the Draft Scope of Work.

B. LIST OF ELECTED OFFICIALS, ORGANIZATIONS, AND INDIVIDUALS THAT COMMENTED ON THE DRAFT SCOPE OF WORK

Elected Officials

1. Fernando Cabrera, NYC Council Member, District 14; oral statement at public scoping meeting
2. Vanessa L. Gibson, NYC Council Member, District 16; written submission, and oral statement at public scoping meeting
3. Latoya Joyner, Assembly Member, 77th Assembly District; written submission, and oral statement at public scoping meeting
4. Victor M. Pilchardo, Assembly Member, 86th Assembly District; oral statement at public scoping meeting
5. Gustavo Rivera, State Senator, 33rd District; oral statement at public scoping meeting
6. Jose M. Serrano, State Senator, 29th District, written submission
7. Scott M. Stringer, NYC Comptroller, written submission

Organizations and Interested Public

A1. Adolfo Abrew, Northwest Bronx Community Clergy Coalition; oral statement at public scoping meeting

A2. Ernesto Acosta, Community Board Representative, Community Board 5; oral statement at public scoping meeting

A3. Frieda Adu-Bren; oral statement at public scoping meeting

A4. Zarin Ahmed; Community Development Project, The Urban Justice Center; oral statement at public scoping meeting

B1. Richard Bass, Senior Planning at Development Consultant, Akerman LLP; written submission

B2. Robert Baofvo; oral statement at public scoping meeting

B3. Thomasina Bashby, Community Board Representative, Community Board 5; oral statement at public scoping meeting

B4. Frank Bell, Laborers Local; written submission

B5. Khalil Bellinger, Local 49; oral statement at public scoping meeting

B6. Hal Bergold, Community Organizer, CASA; written submission

B7. Athena Bernkopf, paralegal, Legal Aid Society; written submission, and oral statement at public scoping meeting

B8. Niamah Bilal, Community Board Representative, Community Board 4, Member of CASA; oral statement at public scoping meeting

B9. Miguel Bliel, member of CASA; oral statement at public scoping meeting

B10. Kavan Brandon, Parks and Recreation Chair, Community Board 5; oral statement at public scoping meeting

B 10.1. Bronx Coalition for a Community Vision

B11. Dr. Marcia Brown; written submission, and oral statement at public scoping meeting

B12. Bryant Brown, testifying on behalf of SEIU 32BJ; oral statement at public scoping meeting

B13. Rachel Brown; oral statement at public scoping meeting

B14. Bill Busk; oral statement at public scoping meeting

C1. Angel Caballero, Community Board Representative, Community Board 5; Director, Davidson Community Center; oral statement at public scoping meeting

C2. Saida Cabrera; oral statement at public scoping meeting

C3. Joyce Campbell-Cullie, former Housing Chair, Community Board 2; oral statement at public scoping meeting

C4. Flo Canada; member of CASA; written submission

C5. Ramon Catala, member of CASA; oral statement at public scoping meeting

C6. Arlo M. Chase; member of CASA; written submission

C7. Fitzroy Christian, Leader at CASA; member of Bronx Coalition for Community Vision; written submission, and oral statement at public scoping meeting

C8. Johnnie Coburn, member of CASA; oral statement at public scoping meeting\

C8.1 Enrique Colon

C9. Henry Colon; written submission, and oral statement at public scoping meeting

C9.1. Community Board 5

C10. Paula Crespo; written submission

C11. Safro Cuevas; oral statement at public scoping meeting

C12. Christine Culpepper, Laborers Local 79; oral statement at public scoping meeting

C13. Doug Cunningham, Pastor New Day Church, Northwest Bronx Community and Clergy Coalition; oral statement at public scoping meeting

C14. Jaqua Curiel, Community Board Representative, Community Board 5; oral statement at public scoping meeting

D1. Brenda Dawson, Chairperson of Municipal Services, Community Board 4; oral statement at public scoping meeting

D2. Lourdes De La Cruz, Leader with CASA; oral statement at public scoping meeting

D3. Mariel De La Cruz; written submission

D4. Wilfrido Demostine, Community Board Representative, Community Board 5; oral statement at public

scoping meeting

D5. Harry DeRienzo, President, Banana Kelly Improvement Association; written submission, and oral statement at public scoping meeting

D6. Edi Didonet; oral statement at public scoping meeting

D7. Giovanni Diyala; oral statement at public scoping meeting

E1. Josh Eichen, Pratt Center for Community Development; written submission, and oral statement at public scoping meeting

E2. Pedro Espagna; oral statement at public scoping meeting

E3. Terrell Estes; written submission

E4. Pedro J. Estevez; written submission, and oral statement at public scoping meeting

F1. Female Speaker 1; oral statement at public scoping meeting

F2. Female Speaker 2; oral statement at public scoping meeting

F3. Female Speaker 3; oral statement at public scoping meeting

F4. Female speaker 4; oral statement at public scoping meeting

F5. Delasia Foreman; oral statement at public scoping meeting

G1. Lourdes Garcia, Leader in CASA; oral statement at public scoping meeting

G2. Vanessa L. Gibson, Member of Local 79; written submission

G3. Erika Glenn, President, Local 79 Women's Committee; oral statement at public scoping meeting

G4. Bob Godfried; oral statement at public scoping meeting

G5. Emily Goldstein, Senior Campaign Organizer, Association for Neighborhood and Housing Development; written submission, and oral statement at public scoping meeting

G6. Steve Greenwood, member of CASA; Local 50; oral statement at public scoping meeting

G7. Margaret Groarke; oral statement at public scoping meeting

H1. Dian Hawkins; oral statement at public scoping meeting

H2. Alejandro Heredia; oral statement at public scoping meeting

H3. Rosanna Hernandez, member of CASA; oral statement at public scoping meeting

H4. Sandy Hornick, testifying on behalf of property owners on block 2855; written submission, and oral statement at public scoping meeting

J1. Hildred James, Community Board Representative, Community Board 4; oral statement at public scoping meeting

J2. Miguel Jimenez; oral statement at public scoping meeting

J3. DeJohn Jones, Parent Leader of the Legal Action Committee; oral statement at public scoping meeting

K1. Alfreda Lee Katz; oral statement at public scoping meeting

K2. Olivia Kavanaugh; written submission

L1. Belinda Lawrence, Community Board Member, Community Board 5; oral statement at public scoping meeting

L2. Michael Leonard, Community Development Project of the Urban Justice Center; oral statement at public scoping meeting

L3. LiveOn NY; written submission

L4. Nova Lucero, Member of Northwest Bronx Community Clergy Coalition; oral statement at public scoping meeting

M1. Male Speaker 1; oral statement at public scoping meeting

M2. Male Speaker 2; oral statement at public scoping meeting

M3. Male Speaker 3; oral statement at public scoping meeting

M4. Male Speaker 4, member of CASA; oral statement at public scoping meeting

M5. Althera Matthews, CASA and Bronx Community Vision Coalition; oral statement at public scoping meeting

M6. Marie McCullough, Community Board Representative, Community Board 4; written submission, and oral statement at public scoping meeting

M7. Bishop Earl McKay, Community Board Representative, Community Board 4; written submission, and oral statement at public scoping meeting

M8. Kerry McLean, Vice President, Community Development at the Women's Housing Development Corporation; written submission, and oral statement at public scoping meeting

M9. Marta Melendez; oral statement at public scoping meeting

M10. Madeline Mendez, member of CASA; oral statement at public scoping meeting

M11. Wayne Molten, Vice President, member of Local 79, 100 Black Construction Workers; written submission, and oral statement at public scoping meeting

M12. Municipal Arts Society; written submission

M13. Julio Munoz, President, South Bronx Community Congress; oral statement at public scoping meeting

N1. Marcel Nigret, Project Manager, Municipal Arts Society; oral statement at public scoping meeting

O1. Dr. Bola Omotosho, Community Board Director; Community Board 5; written submission, and oral statement at public scoping meeting

P1. Hemmer Pascal, Brothers on the Move and CASA; oral statement at public scoping meeting

P2. Linda Pedroia, Community Board Representative, Community Board 5; oral statement at public scoping meeting

P3. Paul Philips, CB4 District Manager; oral statement at public scoping meeting

P4. Pastor Edwin Pierce, Northwest Bronx Community Clergy Coalition; oral statement at public scoping meeting

P5. Arlene Powell, Leader at the Parent Action Committee; written submission, and oral statement at public scoping meeting

Q1. Sergio Quevez, Board member of the Northwest Community Coalition; oral statement at public scoping meeting

R1. Edgar Rames, Community Board Member, Community Board 7; oral statement at public scoping meeting

R2. Stephanie Read; oral statement at public scoping meeting

R3. Martha Reyes, Community Board Member, Community Board 4; oral statement at public scoping meeting

R4. Rev. Dr. Raymond Rivera, Pastor; written submission, and oral statement at public scoping meeting

R5. James J. Roberts, Deputy Commissioner, Bureau of Water & Sewer Operations; written submission

R6. Josia Rodriguez; oral statement at public scoping meeting

- R7. Sigifredo Roman, member of CASA; oral statement at public scoping meeting
- S1. Hakin Salaam, member of CASA; oral statement at public scoping meeting
- S2. Elvis Santana; oral statement at public scoping meeting
- S3. Kathleen Saunders, Chair of Bronx CB4; oral statement at public scoping meeting
- S4. Paul Schubert, CASA; oral statement at public scoping meeting
- S5. Leticia Serano; oral statement at public scoping meeting
- S6. Sandra Shepherd; oral statement at public scoping meeting
- S7. Karen Smith; oral statement at public scoping meeting
- S8. George Sotieoff; oral statement at public scoping meeting
- S9. Gary Spindler; written submission, and oral statement at public scoping meeting
- S10. Adelina St. Clair; oral statement at public scoping meeting
- S11. William Stanford, Jr.; oral statement at public scoping meeting
- S12. Jackson Strong, Community Board Member, Community Board 4; oral statement at public scoping meeting
- S13. David Subren, Member of CASA; written submission, and oral statement at public scoping meeting
- T1. Lawrence Thomas, oral statement at public scoping meeting
- T2. Elizabeth Thompson, Kingsbridge Heights Neighborhood Improvement; oral statement at public scoping meeting
- T3. Ashley Torres; written submission
- T4. Anna Toussant, oral statement at public scoping meeting
- T5. Tanisha Tuli, member of CASA; oral statement at public scoping meeting
- U1. Adrian Untermeyer; written submission
- V1. Sherice Valentine; written submission
- V2. Brigida Valenzuela, oral statement at public scoping meeting
- V3. Nathalia Varela, Bronx Legal Services; written submission, and oral statement at public scoping

meeting

V4. Khalil Vasquez; oral statement at public scoping meeting

V5. Carmen Vega-Rivera, CASA Leader; oral statement at public scoping meeting

W1. Sinade Wadsworth, New York City District Council of Carpenters; written submission, and oral statement at public scoping meeting

W2. Misra Walker; oral statement at public scoping meeting

W3. Adrian Webgian, Urban Justice Center; oral statement at public scoping meeting

W4. Owen Wells, Director of Environmental Review, NYC Department of Parks & Recreation; written submission

W5. Cheryl Westbrook, Community Board Member, Community Board 5; oral statement at public scoping meeting

W6. Myrtle Wilson, Laborers Local 79; written submission, and oral statement at public scoping meeting

W7. Mitchell Wimbish, Project Manager, NYC Department of Environmental Protection; written submission

W8. Women's Housing and Economic Development Corporation; written submission

W9. Guo Zhan Wu, NYCDEP Bureau of Water & Sewer Operations employee; written submission

Y1. Yoselyn Yomez, Leader with CASA; oral statement at public scoping meeting

Y2. Althea York; oral statement at public scoping meeting

C. COMMENTS AND RESPONSES ON THE DRAFT SCOPE OF WORK

1. Project Description/Proposed Actions

Comment 1.01: The Department of City Planning's proposed rezoning is long overdue. The zoning here has remained unchanged since 1961. (H4)

Response: Comment noted.

Comment 1.02: We ask that DCP reassess the applicability of the 1,000 sq. ft. DUF (Page 25) considering the cost/square foot of land has steadily increased in the last decade in all boroughs and is

reflected in increased rent or purchase price. The Economic Development Corporation may be using an 800 sq. ft. DUF for an upper Manhattan project and probably reflects that more residents are occupying less area per dwelling unit than other cities. While there is a trend for micro-units apartments that are less than 400 sq. ft., the average size in NYC seems to be 550 sq. ft. for studios, 750 sq. ft. for one-bedroom and 950 sq. ft. for two-bedroom apartments. Does DCP anticipate a higher percentage of three bedroom apartments in RWCDs? (C9)

Response: As described in the DSOW, the RWCDs was generated based on standard criteria and methodologies along with observed and projected development patterns with the rezoning area. The assumption of 1,000 sf per dwelling unit is used to standardize the dwelling unit count across all developments where actual sizes will fluctuate depending on the developer and subsidies the development is receiving. Overall, the 1,000 sf assumption accounts for both larger sized apartments that accommodate families and smaller studios. Based on the average household size (as report by the U.S. Census) within the rezoning area, demand for larger sized apartments would reinforce the assumption of 1,000 sf per dwelling unit as a conservative standard rate.

Comment 1.03: The impacts of this new population density being brought into the area must be analyzed. (B11)(O1)(D4)(C9.1)

Response: As described in the Section H of the DSOW, the Proposed Actions would allow for the development of new uses and higher densities at the projected and potential development sites. A reasonable worst-case development scenario (RWCDs) was established for both the current (Future No-Action) and proposed zoning (Future With-Action) conditions for a 10-year build period (build year 2026). The incremental difference between the Future No-Action and Future With-Action conditions will serve as the basis for the impact analyses of the EIS.

Comment 1.04: I appreciate that the city's MIH is a useful tool for ensuring affordability in higher income neighborhoods, but along Jerome Avenue we will need to go much further. (2)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 1.05: A full EIS should be completed so that at each step of the review process the various government entities know the full impact of what they are voting on. (D5)(B10.1)

Response: As described in section B of the DSOW, the Proposed Actions are classified as Type 1, as defined under 6 NYCRR 617.4 and 43 RCNY 6-15, subject to environmental review in accordance with CEQR guidelines. An Environmental Assessment Statement (EAS) was completed on August 26, 2016. A Positive Declaration, issued on August 29, 2016, established that the Proposed Actions may have a significant adverse impact on the environment, thus warranting the preparation of an EIS. The CEQR scoping process is intended to focus the EIS on those issues

that are most pertinent to the Proposed Actions. The analyses that will be conducted for the EIS are described in Section I, of the DSOW.

Comment 1.06: DEP reviewed the EIS and draft Scope and has no comments. (W7)

Response: Comment noted.

Comment 1.07: Desiring new construction that fits visually and architecturally to the surrounding neighborhood; Provision of lighting and air around -- lighting along the Jerome Avenue corridor throughout the creation of special rules for new development along the elevated rail line; Permitting more intensive use into two nodes to anchor the neighborhood with corridors such as office space and the entertainment; promotion of active ground floor uses and diverse retail to support community needs; and Provide consistent streetscape throughout the corridor. (1)(C9.1)

Response: Comment noted. Also, please refer to Section F of the DSOW, for a description of the Purpose and Need for the Proposed Actions.

Comment 1.08: We need to address air pollution, noise, construction, and other environmental impacts. (2)

Response: As described in Section I of the DSOW, because the Proposed Actions would affect various areas of environmental concern and were found to have the potential for significant adverse impacts in a number of impact categories, pursuant to the EAS and Positive Declaration, an EIS will be prepared for the Proposed Actions that will analyze all technical areas of concern. The specific technical areas to be included in the EIS, as well as their respective tasks and methodologies, are described in Section I of the DSOW.

Comment 1.09: The EIS study must expand the scope to a one-mile radius from the primary study area that would include five subareas: Fordham Manor/Kingsbridge, University Heights, Morris Heights, Morrisania, and Highbridge. The subareas listed above need to be included in the EIS study because they were rezoned for future construction projects by 2026. The construction projects includes two approved rezoning proposals, the Kingsbridge Armory and the Lower Concourse rezoning. (T3)(C9.1)

Response: Section H of the DSOW describes the analysis framework, including discussion of the Future without the Proposed Actions (No-Action Condition), which includes description of the conditions on the projected development sites in the future were the Proposed Actions not implemented. Section I of the DSOW describes the analytical tasks that will be undertaken in preparation of the EIS, and the respective study areas are described for each of these tasks. These study areas have been defined in accordance with the guidelines of the *CEQR Technical Manual*.

Comment 1.10: We request the detailed analysis because the classification of some of these sites is unclear: for example, some City-owned sites are rated less likely to be developed, and at least one property owner planning to sell is also rated less likely to be developed. We believe that the

Reasonable Worst-Case Development Scenario may need to be revised to more accurately reflect existing conditions and the possibility of development. (W8)

Response: As described in Section H of the DSOW, the RWCDs has been developed using standard methodologies following the CEQR Technical Manual, and employing the assumptions described in detail in Section H.

Comment 1.11: MAS requests Reasonable Worst-Case Development Scenario (RWCDs) be included and considered in the Final Scope of Work. The Draft Scope describes lots that meet the criteria but were excluded from selected projected and potential development sites.

- Lots where construction activity is actively occurring or has recently been completed;
- Schools (public and private), municipal libraries, government offices, hospitals, medical centers and houses of worship (stand-alone);
- Certain large commercial or community facility uses;
- Lots utilized for public transportation and/or public utilities.
- Lots containing multi-family (6 or more dwelling unit) residential buildings; due to required relocation of tenants in rent-stabilized units

(M12)(B10.1)(C9.1)

Response: As described in the Section H of the DSOW, the Proposed Actions would allow for the development of new uses and higher densities at the projected and potential development sites. A reasonable worst-case development scenario (RWCDs) was established for both the current (Future No-Action) and proposed zoning (Future With-Action) conditions for a 10-year build period (build year 2026). The incremental difference between the Future No-Action and Future With-Action conditions will serve as the basis for the impact analyses of the EIS.

Comment 1.12: The Draft Scope of Work for the EIS describes the criteria for selecting projected and potential development sites. Certain lots that meet these criteria were included, including properties containing multiple family residential units. These are defined as having six or more dwelling units. The City argues that these lots are very likely to be redeveloped. However, MAS considers the rationale of removing such properties from the expected, projected development sites as an error. Many multi-family buildings in the study area are in fact underbuilt. These are almost 50 buildings within the rezoning area, and more than 300 in the secondary study area, that have availability of at least 2.5 FAR. They average 37,000 square feet of available development rights for each building. (N1)

Response: Multi-unit buildings with existing individual buildings with 6 or more residential units are unlikely to be redeveloped because of the additional costs and complexities inherent in the required relocation of tenants in rent- stabilized units. It is more unlikely that multi-unit residential buildings would be redeveloped in the rezoning area due to the difficulty of building on vacant or underutilized land in current and projected future market conditions.

Comment 1.13: Projections based on the RWCDs dictate whether specific thresholds identified in the City Environmental Quality Review (CEQR) Technical Manual would be exceeded and a detailed

analysis be required. To reflect the addition of the aforementioned sites in the RWCDs, MAS expects a robust assessment of the CEQR environmental analysis categories. (M12)

Response: The EIS will examine the RWCDs incremental differences between the future without the project and the future with the project (including the aforementioned sites). These incremental differences will be used in the assessment of each of the 19 CEQR environmental analysis categories.

Comment 1.14: The criteria also considers “unique site conditions that would impede redevelopment” as a reason to preserve existing zoning; the shallow lots located next to the elevated rail line and close to a major highway would seem to fit this description, but they are not included in the retention area. We request that DCP release a detailed explanation of how the proposed retention areas were evaluated and selected. (W8)(B10.1)

Response: The sites within and excluded from the proposed rezoning areas were selected for a variety of reasons, including the need to achieve the land use goals developed through the public outreach process.

2. Land Use, Zoning, and Public Policy

Comment 2.01: Based upon past, current and proposed public action, the Environmental Impact Statement should not solely look at the Jerome Avenue zoning district and the point five mile area around it. It should be considered in accordance with other actions currently underway in the South Bronx, including the Webster Avenue rezoning, completed studies and plans for the transformation of the Sheridan Expressway, market development in Port Morris, Melrose Commons, and the old build-out. (D5)(B10.1)

Response: The analyses that will be conducted for the EIS are described in Section H of the DSOW. Study areas for each of the analyses, together with analytical methodologies, as well as future No-Action and future With-Action conditions have been defined in accordance with the guidelines of the *CEQR Technical Manual*.

Comment 2.02: The EIS study must include mitigation measures to avoid or reduce potential significant adverse land use, zoning, and/or public policy impacts will be identified within an expanded 1 mile radius of the primary study area. (T3)(B10.1)(C9.1)

Response: As described in Section I, Task 2, of the DSOW the EIS will include analyses to determine whether the Proposed Actions would result in significant adverse impacts to land use, zoning, or public policy. The methodologies for this set of analyses, including the definition of study area(s), as described in Section I, follows the guidance of the *CEQR Technical Manual*. As described in Section I, Task 20, of the DSOW, where significant adverse impacts have been identified, measures to mitigate those impacts will be described.

Comment 2.03: This Task will “identify, describe, and graphically portray predominant land use patterns” in the study area. This description must include the auto industry, which dominates the commercial landscape in the area, and must reflect an understanding of why the auto industry is prevalent in the area – namely, proximity to the Cross-Bronx Expressway (I-95) and I-87. (W8)(C9.1)

Response: As described in Section I, Task 2, of the DSOW will include analyses of land use, zoning, and public policy. Existing conditions will be described as part of the analysis, per the guidance of the CEQR Technical Manual.

Comment 2.04: The land use analysis should reflect the expanded criteria for selecting projected and potential development sites described to include properties containing multi-family residential buildings (6 or more dwelling units) and buildings likely to contain rent stabilized units. Both typologies should be included in the primary and secondary study areas (rezoning and neighboring areas within ¼ mile). (M12)

Response: The criteria for designating properties as projected or potential development sites are described in Section H of the DSOW. As described in Section I, Task 2, of the DSOW will include analyses of land use, zoning, and public policy. Existing conditions will be described as part of the analysis, per the guidance of the CEQR Technical Manual. As described in Section I, Task 3, the potential for direct or indirect residential displacement is part of the analyses of socioeconomic conditions, which will be conducted per the guidance of the CEQR Technical Manual.

Comment 2.05: We also request that the FEIS include a description of existing conditions in terms of the square footage occupied by land use category (for example, a column for existing conditions might be added to Table 1 on page 27 of the draft EIS scope). (W8)

Response: As described in Section I, Task 2, of the DSOW will include analyses of land use, zoning, and public policy. Existing conditions will be described as part of the analysis, per the guidance of the CEQR Technical Manual.

Comment 2.06: We urge the City in these assessments to pay special attention to the blocks where the zoning will transition between M1-2 and R9A districts, considering the potential conflicts between these zones that we discuss above. (W8)

Response: As described in Section I, Task 2, the analyses of land use, zoning, and public policy will include discussion of the Proposed Actions’ potential effects related to issues of compatibility with surrounding land use, the consistency with zoning and other public policies, and the effect of the Proposed Actions on ongoing development trends and conditions in the study areas.

3. Socioeconomic Conditions

Comment 3.01: The affordability of the new proposed affordable housing must be examined in the context of the local area median income of Community Districts four and five in order to truly assess the extent to which housing will benefit and will be available to existing community residents and their families.

(4)(R1)(B7)(M13)(V5)(R4)(M8)(V3)(P4)(T2)(W3)(C3)(H3)(B5)(C14)(C7)(C11)(V4)(L2)(C2)(W2)(M2)(G1)(S13)(G7)(B2)(H1)(B9)(M4)(1)(2)(M7)(M7)(C1)(W1)(D5)(Y2)(J3)(S12)(S8)(W8)(B10.1)(C9.1)

Response: As described in Section I, Task 3, of the DSOW, the potential for indirect residential displacement will use the most recent available U.S. Census data, New York City Department of Finance's Real Property Assessment Data (RPAD) database, as well as current real estate market data, to present demographic and residential market trends and conditions for the study area. The presentation of study area characteristics will include population estimates, housing tenure and vacancy status, median value and rent, estimates of the number of housing units not subject to rent protection, and median household income. Please refer to Task 3 for further description of the step-by-step preliminary assessment that will be conducted for the EIS. A detailed analysis, if warranted, would utilize more in-depth demographic analysis and field surveys to characterize existing conditions of residents and housing, identify populations at risk of displacement, assesses current and future socioeconomic trends that may affect these populations, and examine the effects of the Proposed Actions on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk.

Comment 3.02: The EIS should study all forms of displacement, including indirect displacement and illegal displacement. (V3)(A1)(G5)(C3)(R6)(D3)(V1)(K2) (W8)(7)(B10.1)(C9.1)

Response: As discussed in the DSOW under Task 3, "Socioeconomic Conditions," pursuant to *CEQR Technical Manual* guidelines, the EIS will include an analysis of direct and indirect residential displacement, and an analysis of direct and indirect business and institutional displacement.

Comment 3.03: The DSOW claims that fewer than 500 residential tenants will be displaced. We are concerned that the scope does not state how you came to this conclusion and we urge you to study the actual direct displacement that will occur as a result of the rezoning. (B7)(N1)

Response: In accordance with *CEQR Technical Manual* guidelines, as described in Section I, Task 3, the assessment of direct residential displacement considers those residential units and associated residents located on projected development sites identified as part of the RWCDs that have the potential to be involuntarily displaced in connection with redevelopment of such sites. The RWCDs was developed in accordance with the guidelines in the *CEQR Technical Manual*, Chapter 2, "Establishing an Analysis Framework." The DSOW indicates that the Proposed Actions would not exceed the *CEQR Technical Manual* analysis threshold of 500 directly displaced residents based on existing uses on the projected development sites, and therefore, are not expected to result in significant adverse impacts due to direct residential displacement. Whether or not the impact is considered significant, the *CEQR Technical Manual* requires that the direct residential displacement be disclosed for any project. The EIS will disclose the number of residential units and estimated number of residents with the potential to be directly

displaced by the Proposed Actions, as well as quantify the amount of direct displacement relative to study area populations.

Comment 3.04: Any investigation of the socioeconomic impact of this rezoning consider how the rezoning will affect jobs in this industry. (B12)(C9.1)

Response: As detailed in Section I, Task 3, of the DSOW, the assessment of Socioeconomic Conditions follows the guidelines of the CEQR Technical Manual and will include assessment of direct and indirect business displacement and effects on specific industries.

Comment 3.05: The City should study the economic impact of the rezoning on the auto-industry. (E1)(U1)(W8)(B10.1)(C9.1)

Response: As described in the DSOW, in accordance with the CEQR Technical Manual, the Socioeconomic Conditions Chapter of the EIS will include an assessment of the Proposed Actions' effect on specific industries as a result of the Proposed Actions and associated RWCDs.

Comment 3.06: The EIS should assess how many affordable units may result from the rezoning and the anticipated rents of those units. (M8)(B10.1)(C9.1)

Response: The proposed rezoning will subject most new residential development to a mandatory affordable housing requirements through the application of the Mandatory Inclusionary Housing program. Beyond MIH mandated affordability, it is expected that a substantial amount of additional affordable units would be created on development sites as a result of the proposed rezoning.

Comment 3.07: The EIS should include an economic impact analysis of the Jerome auto cluster, as well as a retail analysis. (M8) (M12)

Response: As detailed in Section I, Task 3, of the DSOW, the assessment of Socioeconomic Conditions follows the guidelines of the CEQR Technical Manual and will include assessment of direct and indirect business displacement and effects on specific industries.

Comment 3.08: The EIS should study the potentially adverse effects that the rezoning might have on the local building services industry. (B12)

Response: As detailed in Section I, Task 3, of the DSOW, the assessment of Socioeconomic Conditions follows the guidelines of the CEQR Technical Manual and will include assessment of direct and indirect business displacement and effects on specific industries.

Comment 3.09: The Draft Scope of Work does not address the economic impact on the technical types of jobs being created and also fails to highlight the potential hazards of having unskilled labor on this massive rezoning. (C98.1)(W1)

Response: As discussed in Section I, Task 3, of the DSOW, the EIS will estimate the number and types jobs that would be created as a result of the Proposed Actions and associated RWCDs. An analysis of the quality of jobs is outside the scope of CEQR.

Comment 3.10: The City should review the impact of the rezoning and potential direct and indirect displacement of residents through the lens of race and ethnicity. The EIS should also examine for what income and population the housing will be affordable for. (V3)(B10.1)

Response: Comment noted.

Comment 3.11: The City should employ a methodology that fairly assesses and describes existing jobs in the area and how they are likely to be impacted with and without the zoning action. It should also disclose its methods of calculation alongside any figures included in the Draft Scope. The Draft Scope cites an increase of a thousand jobs as a result of rezoning over a no-action scenario, yet fails to provide reference as to how this number was determined and what number and type of job loss it accounts for or obscures. (E1)(B10.1)

Response: As detailed in Section I, Task 3, of the DSOW, the assessment of Socioeconomic Conditions follows the guidelines of the CEQR Technical Manual and will include assessment of direct and indirect business displacement and effects on specific industries.

Comment 3.12: The Department of Small Business Services recently contracted with three community based organizations to collect detailed data about jobs within businesses on the Jerome Avenue corridor. The Department of City Planning should incorporate this data as well as other primary methods to base their analysis on, instead of data sets that will grossly undercount the workforce. The *CEQR Technical Manual* allows for wide discretion for how indirect displacement analysis can be conducted when looking at jobs. There is an important symbiotic relationship that exists between auto retail and auto repair businesses. And among auto related businesses in general, clustering is essential to the survival of the sector. The City must acknowledge its relationship and employ methodology that will accurately assess the impact of rezoning on the full Jerome Avenue auto ecosystem, including the retail component. (E1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 3.13: There are 30 more underbuilt properties in the rezoning area that are likely to have rent stabilized residential units that are registered in the New York State Housing and Community Renewable Department. There could be thousands of rent stabilized units in the rezoning and secondary area that are likely to be deregulated. (N1)

Response: As described in Section I, Task 3, of the DSOW, pursuant to *CEQR Technical Manual* methodologies, the impact analyses will disclose population and housing characteristics and provide estimates of the number and types of housing units subject to rent protection, including those units controlled by rent stabilization in the proposed rezoning area and larger secondary study area.

Comment 3.14: The rezoning will certainly increase incentives for redeveloping these properties and increasing the chances of direct residential displacement. (N1)(B10.1)(C9.1)

Response: As described in Section I, Task 3, of the DSOW, pursuant to the *CEQR Technical Manual*, the EIS will disclose the number of residential units and estimated number of residents to be directly displaced by the Proposed Actions, as well as quantify the amount of direct displacement relative to study area populations. In addition, as the Proposed Actions and associated RWCDs would create a substantial amount of new housing (net incremental increase of 3,230 dwelling units) resulting in a sizable population increase of an estimated 9,573 new residents over the No-Action condition, a detailed analysis of indirect residential displacement will be provided pursuant to *CEQR Technical Manual* guidelines.

Comment 3.15: There is a need and, therefore, there should be a requirement for a cumulative impact assessment on potential tenant displacement. (D5)

Response: As described in Section I, Task 3, of the DSOW, pursuant to the *CEQR Technical Manual*, the EIS will disclose the number of residential units and estimated number of residents to be directly displaced by the Proposed Actions, as well as quantify the amount of direct displacement relative to study area populations. In addition, as the Proposed Actions and associated RWCDs would create a substantial amount of new housing (net incremental increase of 3,230 dwelling units) resulting in a sizable population increase of an estimated 9,573 new residents over the No-Action condition, a detailed analysis of indirect residential displacement will be provided pursuant to *CEQR Technical Manual* guidelines.

Comment 3.16: By excluding sites that are multi-family, the scope will underestimate the potential number of units that could be directly displaced. These sites should be included in the analysis. The scoping document as proposed underestimates the number of residents facing direct displacement due to how it treats potential development sites. Potential development sites will not be included in the study of impacts on residential displacement, only projected development sites will be analyzed for direct displacement. By not including potential development sites in the study of possible socio-economic impacts, the EIS will understate and fail to even study its impacts on direct residential displacement. The development site analysis should be updated to include both multi-family residential buildings and potential development sites for studying socio-economic impact. This will create a conservative analysis that speaks more fully to the potential impact. (7)(C9.1)

Response: As described in Section I, Task 3, of the DSOW, pursuant to the *CEQR Technical Manual*, the EIS will disclose the number of residential units and estimated number of residents to be directly displaced by the Proposed Actions, as well as quantify the amount of direct displacement relative to study area populations. In addition, as the Proposed Actions and associated RWCDs would create a substantial amount of new housing (net incremental increase of 3,230 dwelling units) resulting in a sizable population increase of an estimated 9,573 new

residents over the No-Action condition, a detailed analysis of indirect residential displacement will be provided pursuant to *CEQR Technical Manual* guidelines.

Comment 3.17: I'm concerned that my family and the many other families that have lived here throughout the economic breakdown of the Bronx will not be able to enjoy the benefits the city claims will come with the proposed Jerome Avenue plan. (V1)

Response: As described in Section I, Task 3, of the DSOW, pursuant to the *CEQR Technical Manual*, the EIS will disclose the number of residential units and estimated number of residents to be directly displaced by the Proposed Actions, as well as quantify the amount of direct displacement relative to study area populations. In addition, as the Proposed Actions and associated RWCDs would create a substantial amount of new housing (net incremental increase of 3,230 dwelling units) resulting in a sizable population increase of an estimated 9,573 new residents over the No-Action condition, a detailed analysis of indirect residential displacement will be provided pursuant to *CEQR Technical Manual* guidelines.

Comment 3.18: Will my family and friends be able to afford the new housing? (V1)

Response: This is outside the scope of CEQR.

Comment 3.19: The City should analyze the impacts of this rezoning through the lens of race and ethnicity, especially in light of the vast displacement of people of color, immigrants, and the working poor communities of neighbors -- neighborhoods that have previously been rezoned. (B7)(V3)(M5)(B10.1)

Response: In accordance with the *CEQR Technical Manual*, the EIS will examine the potential for indirect residential impacts on all segments of the population that are potentially vulnerable to displacement.

Comment 3.20: I am concerned with the impacts to small businesses, issues of poverty, and the availability of low income housing. (2)(B10.1)(C9.1)

Response: As described in Section I, Task 3, of the DSOW, the EIS will include an assessment of indirect business displacement. Pursuant to *CEQR Technical Manual* guidelines, the objective of the indirect business displacement analysis is to determine whether the Proposed Actions may introduce trends that make it difficult for those businesses that provide products or services essential to the local economy or that are targeted to be preserved in their current locations under adopted public plans to remain in the area. The indirect business displacement analysis seeks to determine whether the Proposed Actions would increase property values and thus rents for certain businesses, and whether relocation opportunities exist for those firms. A vulnerability analysis of small businesses is outside the scope of CEQR. As part of Task 3 in the DSOW, Socioeconomic Conditions chapter of the EIS will characterize existing conditions of residents and housing in order to identify populations that may be vulnerable to displacement,

assess current and future socioeconomic trends in the area that may affect these populations and examine the effects of the Proposed Actions on prevailing socioeconomic trends and thus, impacts on the populations that could be subject to displacement. The EIS will utilize data from the Census, and American Community Survey to characterize the economic status of the existing population including income levels, median and mean household income, income distribution, and portion of individuals living below poverty level.

Comment 3.21: The rezoning will increase rents. (S12)(M9)(B10.1)

Response: Indirect residential and indirect business displacement analyses seek to determine whether the Proposed Actions would increase property values and thus rents for residents and certain businesses.

Comment 3.22: In Community Board No. 4, which is part of Congressional District 16, there are approximately 150,600 people. According to the U.S. Census, the 16th Congressional District is the poorest in the United States. (R3)

Response: Comment Noted.

Comment 3.23: Why is the City not studying the social and economic impact of job creation? (C12)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 3.24: Are there opportunities for affordable housing that does not create an extreme rent burden? (L3)

Response: This is outside the scope of CEQR. However, as described in Section I, Task 3, of the DSOW, the potential for indirect residential displacement will be analyzed per the guidance of the *CEQR Technical Manual*.

Comment 3.25: The mayor had announced that there would be 15,000 new supportive housing units, however, the market has already eaten up more than that 15,000, and it's going to be years before that 15,000 is built. I believe that this plan will make the problem even worse. (B14)(B10.1)

Response: Comment Noted.

Comment 3.26: Zoning to allow for increased production of affordable housing is one component to combatting New York City's official state of housing emergency. (L3)

Response: Comment noted. However, as described in Section I, Task 3, of the DSOW, the potential for indirect residential displacement will be analyzed per the guidance of the *CEQR Technical Manual*.

Comment 3.27: By not studying the lots containing multifamily homes we are leaving a huge piece of the housing that exist in the zoning area. (D3) (M12)

Response: As described in Section H of the DSOW, lots containing multi-family residential buildings (6 or more dwelling units) have been excluded from consideration as projected and potential development sites due to required relocation of tenants in rent-stabilized units.

Comment 3.28: The scope does not set up a clear depiction of how small businesses/ automotive will be strengthened and what will be studied to ensure that happens. It is feared that not studying potential job loss because of the changeover in businesses, is not taking to consideration the worst-case scenario. (D3)

Response: As outlined in Section I, Task 3, of the DSOW, the socioeconomic conditions analysis will included analyses of direct and indirect business displacement, as well as the potential for adverse effects on specific industries. The assessments will be conducted in accordance with CEQR Technical Manual methodology.

Comment 3.29: The Draft Scope rationalizes the displacement of auto and industrial businesses that provide well-paying jobs with the idea that general retail development is a better alternative which is currently being stifled under existing zoning. However, the auto repair and industrial sectors pay far higher wages on average -- \$44,000 and \$50,000 per year respectively -- than the retail sector which pays an average of \$24,000 per year. We urge the City to study alternatives to the proposed land use action that would enhance the opportunities for well-paying jobs in the Jerome Avenue corridor instead of dismantling them. (E1)

Response: As discussed in Section I, Task 3, of the DSOW, the EIS will estimate the number and types of jobs that would be created as a result of the Proposed Actions and associated RWCDs. An analysis of the quality of jobs is outside the scope of CEQR.

Comment 3.30: A more accurate methodology is needed for assessing and describing job quantities and qualities. The City should employ a methodology that fairly assesses and describes existing jobs in the area and how they are likely to be impacted with and without rezoning action. It should also disclose its methods of calculation alongside any figures included in the Draft Scope. The Draft Scope cites an increase of 1,016 jobs as a result of the rezoning over a "No Action" scenario, yet fails to provide reference as to how this number was determined, what percent of these jobs are expected to pay a living wage and in which sectors, and - assuming this is a net figure - what number and type of job loss it obscures. Based on the proposed zoning changes, it is likely that close to 75% of the auto sector workforce – hundreds of jobs -will be displaced. The City's proposed method for assessing job displacement improperly relies on counts from New York State

Department of Labor (NYSDOL) and US Census. The Jerome Ave rezoning geography is far too small for either data set to produce an accurate count of jobs and many of the auto businesses employ workers that would not be represented in official record for various reasons. Fortunately, the *CEQR Technical Manual* explicitly allows for alternatives, stating that the City can use information collected and published by local organizations to characterize the employment of businesses in the rezoning area. Department of Small Business Service (DSBS) recently contracted with three local community based organizations (WHEDco, Davidson, and UAMA) to collect detailed data as part of their Commercial District Needs Assessment (CDNA) process. The Department of City Planning (DCP) should incorporate this data as well as other primary methods to base their analysis on – instead of data sets that will grossly undercount the workforce. (E1)(B10.1)(C9.1)

Response: Consistent with the CEQR Technical Manual, the analysis of direct business displacement relies on field observations, telephone surveys, as well as interviews to identify existing businesses and employment levels on projected development sites.

Comment 3.31: Indirect displacement analysis must take into account the importance of clustering. The *CEQR Technical Manual* states that “indirect displacement of businesses may occur if a project directly displaces any type of use that either directly supports businesses in the area or brings a customer base to the area for local businesses” and allows for wide discretion for how that analysis can be conducted. There is an important symbiotic relationship that exists between auto retail and auto repair businesses, and among auto related businesses in general; clustering is essential to the survival of the sector. The City must acknowledge this relationship and employ a methodology that will accurately assess the impact of rezoning on the full Jerome auto economic ecosystem, including the retail component. (E1)(B10.1)(C9.1)

Response: Comment noted. The indirect business displacement assessment will be conducted in accordance with CEQR Technical Manual methodology.

Comment 3.32: The EIS should analyze whether there are opportunities for affordable housing that do not create an extreme rent burden, and whether these options are accessible to seniors (i.e. no stairs). (L3)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 3.33: As with direct residential displacement, the scoping study may underestimate the total change in population due to its treatment of development sites. This should be rectified and the scoping document revised to consider the full potential impact. (7)(B10.1)

Response: As described in Section H of the DSOW, the EIS will assess both density-related and site-specific potential impacts from development on all projected development sites, in accordance with CEQR guidelines. Density-related impacts are dependent on the amount and type of development projected on a site. Development is not anticipated on the potential development sites in the foreseeable future, and therefore these sites have not been included in the density-related impact assessments. As the socioeconomics is a density-based analysis, it will included only projected development sites, in accordance with *CEQR Technical Manual* guidelines.

Comment 3.34: Astoundingly, the scoping analysis assumes that 98,002 SF of auto-related uses will be lost as it relies only on projected sites. However, when potential sites are including, this number rises to a staggering 472,969 SF of auto-related uses. As with residential displacement, the DEIS should consider both potential and projected development sites when studying the impact of displacing local businesses. To mitigate the potential impact, the EIS should consider alternatives including, but not limited to, limiting the permitted uses to preserve the existing uses (similar to the Tribeca Special Mixed Use District); limiting the sites that can be converted from manufacturing to residential (similar to zoning restrictions found in the Special Hudson Square District); and increasing the amount of space that will remain zoned for manufacturing. (7)(B10.3)

Response: As described in Section H of the DSOW, the EIS will assess both density-related and site-specific potential impacts from development on all projected development sites, in accordance with CEQR guidelines. Density-related impacts are dependent on the amount and type of development projected on a site. Development is not anticipated on the potential development sites in the foreseeable future, and therefore these sites have not been included in the density-related impact assessments. As the socioeconomics is a density-based analysis, it will included only projected development sites, in accordance with *CEQR Technical Manual* guidelines.

Comment 3.35: The EIS study must include the subareas of Fordham Manor, University Heights, Morrisania Heights, Morrisania and Highbridge in their analysis of direct and indirect resident and business displacement. (T3)

Response: As indicated in Section I, Task 3, of the DSOW, as the Proposed Actions would affect an approximately two-mile stretch of Jerome Avenue in portions of several communities, it may be appropriate to create subareas for analysis. As noted in the *CEQR Technical Manual*, for area-wide rezoning projects that cover multiple neighborhoods and distinct residential markets, it is appropriate to consider subareas within the study area. Therefore, the for the purposes of the analysis of indirect residential displacement, which focuses on the effects of the Proposed Actions on the local area residential markets, in addition to the ¼-mile secondary

study area, the analysis examines the potential for indirect displacement effects within neighborhood subareas. These distinct subareas will be determined based on recognizable neighborhoods or communities in an effort to disclose whether the Proposed Actions may have differing effects on distinct populations that would otherwise be masked or overlooked.

~~Comment 3.36: The EIS study must include the direct and indirect resident and business displacement that the Jerome Avenue rezoning and the Lower Concourse Rezoning will have on the development of waterfront communities along the Harlem River. This includes the subarea communities of Highbridge, Fordham Manor and University Heights. (T3)~~

Response:

Comment 3.37: Determine the real estate market conditions in the subareas within the 1 mile radius of the primary study area in order to assess the direct and indirect displacement of businesses and residents. (T3)(B10.1)

Response: As presented in Section I, Task 3, of the DSOW, in accordance with *CEQR Technical Manual* methodology, the socioeconomics study area boundaries are expected to be similar to those of the land use study area and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. If the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a 0.25-mile study area, the study area would be expanded to 0.5 files. In addition, in accordance with *CEQR Technical Manual* guidelines, the indirect residential displacement analysis considers an area “near” the study area (i.e., within an approximate ½-mile radius of the secondary study area) to examine real estate markets trends and ascertain whether the surrounding area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Action on such trends.

Comment 3.38: A detailed analysis of the 1 mile radius of the primary study area which includes- in-depth demographic analysis and field surveys to characterize existing conditions of residents and housing, identify populations at risk of displacement, assess current and future socioeconomic trends that may affect these populations, and examine the effects of the Proposed Actions on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk. (T3)(B10.1)

Response: As presented in Section I, Task 3, of the DSOW, in accordance with *CEQR Technical Manual* methodology, the socioeconomics study area boundaries are expected to be similar to those of the land use study area and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. If the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a 0.25-mile study area, the study area would be expanded to 0.5 files. In addition, in accordance with *CEQR Technical Manual* guidelines, the indirect residential displacement analysis considers

an area “near” the study area (i.e., within an approximate ½-mile radius of the secondary study area) to examine real estate markets trends and ascertain whether the surrounding area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Action on such trends.

In addition, based on findings of the preliminary analyses, detailed analyses will be prepared if deemed warranted in accordance with *CEQR Technical Manual* methodology.

Comment 3.39: The amount of rent-stabilized, project based section 8, cluster sites, supportive housing and 421-A dwelling units in the primary and secondary land use study that will be impacted by direct and indirect residential and business displacement. This includes the subareas of Fordham Manor, University Heights, Morris Heights, Morrisania, Highbridge and the 1 mile radius of the primary land use study. (T3)

Response: As presented in Section I, Task 3, of the DSOW, in accordance with *CEQR Technical Manual* methodology, the socioeconomics study area boundaries are expected to be similar to those of the land use study area and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. If the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a 0.25-mile study area, the study area would be expanded to 0.5 miles. In addition, in accordance with *CEQR Technical Manual* guidelines, the indirect residential displacement analysis considers an area “near” the study area (i.e., within an approximate ½-mile radius of the secondary study area) to examine real estate markets trends and ascertain whether the surrounding area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Action on such trends.

In addition, based on findings of the preliminary analyses, detailed analyses will be prepared if deemed warranted in accordance with *CEQR Technical Manual* methodology.

Comment 3.40: Disclose the amount of housing that could be created in partnership with not-for-profits instead of using mandatory inclusionary housing in the primary and secondary land use study. This includes the subareas and the 1 mile radius of the primary land use study. (T3)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 3.41: The EIS must include the AMI of residents within the primary and secondary study, and assess the amount of residents that do not have the AMI to qualify for the mandatory inclusionary housing. This includes expanding the EIS analysis to incorporate the 1 mile radius of the primary study and to include the subareas. (T3)(C9.1)

Response: As presented in Section I, Task 3, of the DSOW, in accordance with *CEQR Technical Manual* methodology, the socioeconomics study area boundaries are expected to be similar to those of the land use study area and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. If the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a 0.25-mile study area, the study area would be expanded to 0.5 files. In addition, in accordance with *CEQR Technical Manual* guidelines, the indirect residential displacement analysis considers an area “near” the study area (i.e., within an approximate ½-mile radius of the secondary study area) to examine real estate markets trends and ascertain whether the surrounding area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Action on such trends.

In addition, as noted in Section I, Task 3, of the DSOW, as part of Step 1 of the indirect residential displacement assessment, the average incomes of the existing population and population introduced by the RWCDs associated with the Proposed Actions will be disclosed.

Comment 3.42: Disclose the amount of cluster site and supportive housing that are unprotected dwelling units in the primary and secondary study area. (T3)

Response: As noted in Section I, Task 3, of the DSOW, if a detailed indirect residential displacement analysis is warranted based on the findings of the preliminary analysis, the amount of unprotected and households at risk of displacement will be identified.

Comment 3.43: Analyze the amount of non-for-profit affordable housing in the primary and secondary study. This includes the subareas and the 1 mile radius of the primary land use study. (T3)

Response: As presented in Section I, Task 3, of the DSOW, in accordance with *CEQR Technical Manual* methodology, the socioeconomics study area boundaries are expected to be similar to those of the land use study area and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. If the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a 0.25-mile study area, the study area would be expanded to 0.5 files. In addition, in accordance with *CEQR Technical Manual* guidelines, the indirect residential displacement analysis considers an area “near” the study area (i.e., within an approximate ½-mile radius of the secondary study area) to examine real estate markets trends and ascertain whether the surrounding area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Action on such trends.

In addition, as noted in Section I, Task 3, of the DSOW, as part of Step 1 of the indirect residential displacement assessment, the average incomes of the existing population and population introduced by the RWCDs associated with the Proposed Actions will be disclosed.

~~Comment 3.44: Analyze the amount of possible non-for-profit affordable housing in the primary and secondary study. This includes the subareas and the 1 mile radius of the primary land use study. (T3)~~

Response:

Comment 3.45: There are many cluster sites located on Featherbed Lane. The residents of the cluster sites could experience direct and indirect displacement because of the rezoning. The EIS study must include an analysis of how many residents this affects and how it would increase homelessness. This data must be incorporated in the primary and secondary land use study. This includes the subareas and the 1 mile radius of the primary land use study. (T3)(B10.1)

Response: As discussed in the DSOW under Task 3, "Socioeconomic Conditions," pursuant to CEQR Technical Manual guidelines, the EIS will include an analysis of direct and indirect residential displacement

Comment 3.46: Provide and disclose the amount of unprotected dwelling units in rezoning areas containing low-income residents. Also include the amount of unprotected dwelling units that will be affected by direct and indirect residential and business displacement. This includes the subareas and the 1 mile radius of the primary land use study. (T3)(B10.1)(C9.1)

Response: As presented in Section I, Task 3, of the DSOW, in accordance with CEQR Technical Manual methodology, the socioeconomics study area boundaries are expected to be similar to those of the land use study area and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. If the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a 0.25-mile study area, the study area would be expanded to 0.5 miles. In addition, in accordance with CEQR Technical Manual guidelines, the indirect residential displacement analysis considers an area "near" the study area (i.e., within an approximate ½-mile radius of the secondary study area) to examine real estate markets trends and ascertain whether the surrounding area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Action on such trends.

DUPLICATE RESPONSE. As noted in Section I, Task 3, of the DSOW, if a detailed indirect residential displacement analysis is warranted based on the findings of the preliminary analysis, the amount of unprotected and households at risk of displacement will be identified.

Comment 3.47: Determine the net in-migration, if the zoning proposal was adopted. This includes the subareas and the 1 mile radius of the primary land use study. (T3)(C9.1)

Response: : The population to be introduced by the RWCDs associated with the Proposed Actions will be identified, along with a discussion of No-Action population changes anticipated in the rezoning area and greater study area.

Comment 3.48: Include the direct and indirect impact that the Jerome Avenue, Kingsbridge Armory and Lower Concourse rezoning will have on the net immigration and the previous population of the neighborhood in the primary and secondary study. (T3)

Response: Per CEQR, all known planned developments and relevant land use and zoning actions within .5 miles of the rezoning area will be analyzed in this DEIS. For information specific to the Kingsbridge Armory and Lower Concourse projects, please see the Environmental Impact Statements related to those projects.

Comment 3.49: The EIS study must disclose the number of residential units and estimated number of residents to be directly and indirectly displaced by the Proposed Actions, and will determine the amount of displacement relative to study area population. This includes the subareas and the 1 mile radius of the primary land use study. (T3)

Response: As outlined in Section I, Task 3, of the DSOW, pursuant to the CEQR Technical Manual methodology, the EIS will include an analysis of indirect residential displacement. The Proposed Actions do not warrant an analysis of direct residential displacement, as the RWCDs associated with the Proposed Actions would displace fewer than 500 residents.

Comment 3.50: Determine whether the primary and secondary study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends and whether the study area potentially contains a population at risk of indirect displacement resulting from rent increases due to changes in the real estate market caused by the new population. This must include the subareas and the 1 mile radius of the primary land use study. (T3)

Response: The indirect residential displacement analysis will be conducted in accordance with CEQR Technical Manual methodology. As outlined in Section I, Task 3, of the DSOW, the analyses identified in this comment will be conducted as part of Step 3 of the preliminary analysis or, if warranted, as part of a detailed analysis of indirect residential displacement.

Comment 3.51: Disclose the amount of indirect and direct displaced independent retailers in the primary and secondary study. This includes the subareas and the 1 mile radius of the primary land use study. (T3)

Response: As outlined in Section I, Task 3, of the DSOW, the DEIS will include analyses of indirect and direct business displacement. The analyses will be conducted in accordance with CEQR Technical Manual methodology.

Comment 3.52: The EIS study must crunch the numbers and determine the amount of vacant storefronts on 149th, Fordham Road and Kingsbridge Road. This includes the subareas and the 1 mile radius of the primary land use study. (T3)

Response: This is outside the scope of CEQR.

Comment 3.53: The EIS study must crunch the numbers on whether the businesses to be displaced provide products or services essential to the local economy that would no longer be available in its "trade area" to local residents or businesses due to the difficulty of either relocating the

businesses or establishing new, comparable businesses. This includes the automotive industry on Jerome Avenue. (T3)

Response: As outlined in Section I, Task 3, of the DSOW, the EIS will include analyses direct business displacement and adverse effects on specific industries. The analyses will be conducted in accordance with CEQR Technical Manual methodology.

Comment 3.54: The EIS study must also include the impact that the Jerome Avenue, Kingsbridge Armory and Lower Concourse will have in order to determine the net in-migration of new businesses, and the previous population of the small businesses in the primary and secondary study. This includes the subareas and the 1 mile radius of the primary land use study. (T3)

Response: Per CEQR, all known planned developments and relevant land use and zoning actions within .5 miles of the rezoning area will be analyzed in this DEIS. For information specific to the Kingsbridge Armory and Lower Concourse projects, please see the Environmental Impact Statements related to those projects.

Comment 3.55: The EIS study must include within the primary and secondary study the direct impact that high rent, short term leases and the extortion of immigrant business owners will have on the cultural resources in the preexisting communities on Fordham Road, Kingsbridge Road and Jerome Avenue. This includes the subareas and the 1 mile radius of the primary land use study. (T3)

Response: This is outside the scope of CEQR.

Comment 3.56: The EIS study must include the effects that the construction displacement will have on residents and businesses in the primary and secondary land use study. This must include the Lower Concourse and Kingsbridge rezoning because they will be undergoing construction by 2026. (T3)

Response: Per CEQR, all known planned developments and relevant land use and zoning actions within .5 miles of the rezoning area will be analyzed in this DEIS. For information specific to the Kingsbridge Armory and Lower Concourse projects, please see the Environmental Impact Statements related to those projects.

Comment 3.57: WHEDco strongly recommends that the FEIS include a retail needs assessment to complement the study of direct and indirect business displacement and inform potential mitigation. (W8)

Response: Comment noted

Comment 3.58: Potential zoning changes must be carefully evaluated to ensure that the benefits of economic development do not directly or indirectly displace residents, overwhelm existing infrastructure, or create short-term employment gains at the expense of longer-term employment gains. (7)(B10.1)

Response: Comment noted. As described in Section I, Task 3, of the DSOW, the EIS will include a socioeconomic conditions analysis, including analyses of indirect residential and business displacement, direct business displacement, and adverse effects on specific industries. The analyses will be conducted in accordance with CEQR Technical Manual methodology.

Comment 3.59: Further, the area's relative proximity to mass transit, Claremont Park, Yankee Stadium, and other attractions will position the area for transit oriented development and potentially exacerbate the economic pressures. (7)

Response: Comment noted.

Comment 3.60: As currently proposed, the draft scope of work minimizes the potential impacts on existing residents and businesses and could artificially skew the EIS to not require analysis. (7)

Response: As described in Section H of the DSOW, the EIS will assess both density-related and site-specific potential impacts from development on all projected development sites, in accordance with CEQR guidelines. Density-related impacts are dependent on the amount and type of development projected on a site. Development is not anticipated on the potential development sites in the foreseeable future, and therefore these sites have not been included in the density-related impact assessments. As the socioeconomics is a density-based analysis, it will included only projected development sites, in accordance with CEQR Technical Manual guidelines.

Comment 3.61: By excluding sites that are multi-family, the scope will underestimate the potential number of units that could be directly displaced. These sites should be included in the analysis. (7)

Response: As described in Section H of the DSOW, lots containing multi-family residential buildings (6 or more dwelling units) have been excluded from consideration as projected and potential development sites due to required relocation of tenants in rent-stabilized units.

Comment 3.62: Given the new population that is being added and the potential impacts, it is imperative that a robust study of both potential and projected development sites be conducted, analyzed, and any impacts mitigated. (7)

Response: As described in Section H of the DSOW, the EIS will assess both density-related and site-specific potential impacts from development on all projected development sites, in accordance with CEQR guidelines. Density-related impacts are dependent on the amount and type of development projected on a site. Development is not anticipated on the potential development sites in the foreseeable future, and therefore these sites have not been included in the density-related impact assessments. As the socioeconomics is a density-based analysis, it will included only projected development sites, in accordance with CEQR Technical Manual guidelines.

~~Comment 3.63: The scoping analysis assumes that 98,002 SF of auto-related uses will be lost as it relies only on projected sites. However, when potential sites are including, this number rises to 472,969 SF of auto-related uses. (7)~~

Response:

Comment 3.64: The Socioeconomics analysis should provide details on how the project would support auto-related business, especially in light of the anticipated elimination of almost 100,000 square feet of existing car-related business. (M12)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 3.65: We ask that the methodology for preserving affordable housing units and mitigating residential displacement be explicitly addressed and included in the Jerome Avenue Neighborhood Study and resulting Plan. (W8)(B10.1)

Response: As discussed in the DSOW under Task 3, "Socioeconomic Conditions," pursuant to CEQR Technical Manual guidelines, the EIS will include an analysis of direct and indirect residential displacement,

The Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 3.66: We believe that the criteria for selecting the proposed retention areas is flawed: the criteria prioritizes locations that are located *off* of major streets; however, it is important for auto businesses to be *on* a major street, to be closer to the traffic that comes on and off of the Cross-Bronx Expressway. (W8)

Response: Comment noted.

Comment 3.67: The City argues that the Proposed Actions would not exceed the threshold of 500 displaced residents and, therefore, are not expected to result in significant adverse impacts due to direct residential displacement. However, the RWCDs is likely to be underestimating residential displacement as it fails to account for potential direct displacement from under-built multifamily buildings and secondary displacement from rent stabilized units that may be deregulated. MAS finds that including these properties in the selection criteria for development sites, as described previously, is likely to result in more than 500 directly displaced residents. (M12)

Response: As described in Section H of the DSOW, lots containing multi-family residential buildings (6 or more dwelling units) have been excluded from consideration as projected and potential development sites due to required relocation of tenants in rent-stabilized units.

As described in Section H of the DSOW, the EIS will assess both density-related and site-specific potential impacts from development on all projected development sites, in accordance with CEQR guidelines. Density-related impacts are dependent on the amount and type of development projected on a site. Development is not anticipated on the potential development sites in the foreseeable future, and therefore these sites have not been included in the density-related impact assessments. As the socioeconomics is a density-based analysis, it will include only projected development sites, in accordance with CEQR Technical Manual guidelines.

Comment 3.68: This task includes a land use assessment that considers the proposed action's compliance with and effect on "other applicable public policies." While the plan lists Housing New York as an applicable public policy, it is not clear if Mandatory Inclusionary Housing (MIH) is included in this assessment. We recommend that this assessment include a detailed analysis of how MIH may be applied in the study area after the proposed action, how many affordable housing units may result from the application of MIH, and the anticipated level of affordability those units will provide. (W8)(B10.1)

Response: Mandatory Inclusionary Housing will be mapped wherever a new zoning district significantly increases the amount of residential square footage that can be built compared to what the existing district would allow. A Mandatory Inclusionary Housing Map will be included in both the DEIS and the filed ULURP application.

More information on the MIH program and the associated affordability ranges can be found here: <http://www1.nyc.gov/site/planning/plans/mih/mandatory-inclusionary-housing.page>

Comment 3.69: This Task will discuss the "effect of the Proposed Actions on ongoing development trends and conditions in the study areas." This discussion must consider development and speculation trends occurring across the South Bronx, resulting in rising rents and more frequent occurrences of residential and commercial tenant harassment. The FEIS should answer the question of how the proposed action will impact such trends. (W8)

Response: As outlined in Section I, Task 3, of the DSOW, as part of Step 3 of the indirect residential displacement assessment, existing study area trends will be identified. The socioeconomic conditions study area will be established in accordance with *CEQR Technical Manual* methodology.

As presented in Section I, Task 3, of the DSOW, in accordance with *CEQR Technical Manual* methodology, the socioeconomics study area boundaries are expected to be similar to those of the land use study area and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. If the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a 0.25-mile study area, the study area would be expanded to 0.5 miles. In addition, in accordance with *CEQR Technical Manual* guidelines, the indirect residential displacement analysis considers an area "near" the study area (i.e., within an approximate ½-mile radius of the secondary study

area) to examine real estate markets trends and ascertain whether the surrounding area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Action on such trends.

Comment 3.70: We recommend that this assessment include estimates of potential jobs (both construction jobs and jobs that support the construction industry, like food service, retail, manufacturing, etc.) created during the construction phase of the plan. We also encourage DCP to include in its neighborhood plan an enforceable plan to require the hiring of local residents to fill these new jobs. (W8)(B10.1)(C9.1)

Response: As outlined in Section I, Task 3, of the DSOW, the EIS will include analyses direct business displacement and adverse effects on specific industries. The analyses will be conducted in accordance with CEQR Technical Manual methodology.

Comment 3.71: DCP should include a complete retail needs assessment in the EIS (discussed further below) and should explore ways to encourage ground-floor commercial uses that meet these needs. (W8)(B10.1)(C9.1)

Response: The Department of Small Business Services engaged local partners (WHEDco and the Davidson Community Center) to conduct a comprehensive study of the retail corridors in and along Jerome Avenue. Additionally, SBS funded full-time staff, “Neighborhood 360 Fellows” for the organizations to help build capacity and complete the work. The report, the Jerome Avenue Commercial District Needs Assessment (CDNA), documented all existing commercial uses, including automotive uses and included specific recommendations to overcome issues along these retail corridors and capitalize on opportunities throughout the study area.

The Jerome Avenue Commercial District Needs Assessment can be found here: <http://www1.nyc.gov/assets/sbs/downloads/pdf/neighborhoods/n360-cdna-jerome.pdf>

Comment 3.72: The EIS must analyze areas expected for construction by 2026, this includes the subareas listed above, the 1 mile radius of the primary study area and the rezoning of the Lower Concourse and the Kingsbridge Armory in order to determine the indirect and direct displacement of residents and businesses. (T3)

Response: As presented in Section I, Task 3, of the DSOW, in accordance with CEQR Technical Manual methodology, the socioeconomics study area boundaries are expected to be similar to those of the land use study area and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. If the RWCDs associated with the Proposed Actions would increase the population by 5 percent compared to the expected No-Action population in a 0.25-mile study area, the study area would be expanded to 0.5 miles. In addition, in accordance with CEQR Technical Manual guidelines, the indirect residential displacement analysis considers an area “near” the study area (i.e., within an approximate ½-mile radius of the secondary study

area) to examine real estate markets trends and ascertain whether the surrounding area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Action on such trends.

As noted in Section I, Task 3, of the DSOW, if a detailed indirect residential displacement analysis is warranted based on the findings of the preliminary analysis, the amount of unprotected and households at risk of displacement will be identified.

Comment 3.73: Potential zoning changes must be carefully evaluated to ensure that the benefits of economic development do not directly or indirectly displace residents, overwhelm existing infrastructure, or create short-term employment gains at the expense of longer-term employment gains. (7)(B10.1)(C9.1)

Response: As described in the DSOW, the Proposed Actions will be evaluated in the EIS to determine whether the Proposed Actions would result in any significant adverse impacts.

Comment 3.74: Affordable housing needs to be provided for a wide range of income levels. (1)(5)(C2)(C14)(C12)(B4)(B10.1)(C9.1)

Response: Comment Noted.

Comment 3.75: We need to preserve the affordable housing we already have. (K1)(5)(G4)(B6)(B10.1)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 3.76: Affordable housing for seniors, people with disabilities, and veterans needs to be preserved and expanded. (B14)(M6)(P2)(T2)(F5)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 3.77: The auto industry should be preserved and training for business development and expansion should be provided by the City. (W5)(R4)(F4)(1)(4)(S3)(2)(V3)(E1)(E4)(W2)(Y2)(G3)(J2)(M4)(B10.1)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 3.78: We strongly support a package of incentives that allows qualifying businesses to relocate. (W5)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 3.79: The Bronx is over-served by the auto-industry. (H4)

Response: Comment Noted.

Comment 3.80: Retention Zones” are insufficient to accomplish their stated goal; alternatives should be studied. The draft scope of work references four areas, currently zoned C8 and M1 (heavy commercial and light manufacturing), that are excluded from the rezoning as “retention zones” in order to support the auto and industrial sectors. These so-called “retention zones” are grossly insufficient in size and not protected well enough in the plan to accomplish the stated goal. As such, they cannot be classified as policy that will mitigate or reduce the impact of business displacement in any section of the Draft Scope or Environmental Impact Statement. (E1)(B10.1)(C9.1)

Response: Comment noted.

Comment 3.81: To better support the auto and industrial sectors that exist on Jerome Avenue the City should study how expanding the retention zones to be continuous so as to promote consistent clusters of business activity without conflicting residential uses. The City should study how including retention zones inside the Jerome Avenue special district to enable heightened protection mechanisms, such as a restriction of allowable use groups to only industrial and auto related businesses. (E1)

Response: Comment noted.

Comment 3.82: We do not believe that enough land area will be preserved for heavy commercial and light industrial uses. (W8)(C9.1)

Response: Comment noted.

4. Community Facilities and Services

Comment 4.01: The EIS should study the impact of the increased population on public safety resources. (O1)(A2)(B10)(W5)(D6)(S4)(C9.1)

Response: As described in Section I, Task 4, of the DSOW, the RWCDs would not trigger detailed analyses of potential impacts on police/fire stations and health care services, per CEQR. However, for informational purposes, a description of existing police, fire, and health care facilities serving the rezoning area will be provided in the EIS.

Comment 4.02: The EIS should study the impact of the increased population on health care resources. (R3)

Response: As described in Section I, Task 4, of the DSOW, the RWCDs would not trigger detailed analyses of potential impacts on police/fire stations and health care services, per CEQR. However, for informational purposes, a description of existing police, fire, and health care facilities serving the rezoning area will be provided in the EIS.

Comment 4.03: The EIS should study the impact of the increased population on local school capacity. (P3)(1)(B8)(B11)(O1)(2)(L1)(P5)(C1)(B14)(2)(B10.1)(C9.1)

Response: As described in Section I, Task 4, of the DSOW, the RWCDs would trigger detailed analyses of potential impacts on elementary, intermediate, and high schools, libraries, and child care centers. The methodologies for conducting EIS analyses related to public schools follow the guidelines of the *CEQR Technical Manual* and are described in Section I, Task 4, of the DSOW.

Comment 4.04: Post Office on 2024 Jerome Avenue is over capacity. (B6)

Response: As described in Section I, Task 4, of the DSOW, the community facilities and services analysis will follow the guidance of the *CEQR Technical Manual*. The *CEQR Technical Manual* defines community facilities as public or publicly funded schools, libraries, child care centers, health care facilities, and fire and police protection.

Comment 4.05: CEQR states that only schools that are currently under construction can be referenced in the quantitative analysis of utilization. However, CEQR does allow potential school seats that are neither under construction nor in the School Construction Authority's 5-year plan to be considered in qualitative analyses. This is risky. School construction projects, like so many other major real estate projects across the City, are complicated, expensive undertakings that are hypothetical until a shovel hits the ground, so the City should not count its chickens before they hatch. (C10)(B10.1)(C9.1)

Response: As described in Section I, Task 4, of the DSOW, the community facilities and services analysis will follow the guidance of the *CEQR Technical Manual*. The *CEQR Technical Manual* stipulates that the DOE's Five Year Capital Plan may provide for new capacity for the study area and/or the school district. New seats should be included in the quantitative analysis for projects in the Five Year Capital Plan that have commenced construction. If construction has not commenced, new seats for projects in the Five-Year Capital Plan may be included in the quantitative analysis

if the lead agency, in consultation with SCA, concurs that it is appropriate under the circumstances. This is considered on a case-by-case basis to ensure a conservative analysis approach.

Comment 4.06: CEQR's current criteria for determining if there will be a significant adverse impact on school utilization has a critical flaw. Instead of just requiring that the post-rezoning "target utilization rate" be above 100 to make the determination of a significant adverse impact, it also requires that there be an at least 5% increase in utilization rates after the rezoning. Given that schools in this area are already overburdened, a post-rezoning target utilization rate of anything over 100 should be enough to qualify a significant adverse impact. This point is also relevant to publicly subsidized child care seats. (C10)(B10.1)

Response: As described in Section I, Task 4, of the DSOW, the community facilities and services analysis will follow the guidance of the CEQR Technical Manual.

Comment 4.07: In the past, the City has claimed no significant adverse impacts in cases where an overburdened library's catchment area overlaps with a catchment area of a library with capacity. Nowhere in CEQR does it state that this is allowed, and this should not be claimed in the case of Jerome Ave should such a scenario occur. (C10)(B10.1)

Response: As described in Section I, Task 4, of the DSOW, the community facilities and services analysis will follow the guidance of the CEQR Technical Manual.

Comment 4.08: The current definition of a library catchment area is a simple ¼ mile radius around the library itself. This geography does not take into account significant physical barriers, such as the Cross-Bronx Expressway, that may make it harder for people of all ages to access a local library. The City must recognize these types of physical barriers and adjust library catchment areas accordingly. (C10)(B10.1)

Response: As described in Section I, Task 4, of the DSOW, the community facilities and services analysis will follow the guidance of the CEQR Technical Manual. While each library's catchment area is defined as a ¼ mile radius around the library itself, an analysis of impacts to libraries considers multiple factors. Residents in the study area have access to the entire NYPL system, which has branches in Manhattan and Staten Island. Through the interlibrary loan system, residents can have volumes delivered directly to their nearest library branch. In addition, residents have access to libraries near their place of work.

Comment 4.09: The EIS should analyze whether there is an adequate supply of healthcare providers. (L3)

Response: As described in Section I, Task 4, of the DSOW, the community facilities and services analysis will follow the guidance of the CEQR Technical Manual. As explained in the CEQR Technical Manual, health care facilities include public, proprietary, and non-profit facilities that accept public funds (usually in the form of Medicare and Medicaid reimbursements) and that are available to any member of the community. Generally, a detailed assessment of service delivery

is conducted only if a proposed project would affect the physical operations of, or access to and from, a hospital or a public health clinic or where a proposed project would create a sizeable new neighborhood where none existed before.

Comment 4.10: We recommend that the FEIS include an analysis of publically-funded after school programs, as well as programs for teenagers and young adults, that serve the study area, and include mitigations to ensure that enough seats (and in turn, enough funding) will be created to serve the increased population after the proposed action. (M12)

Response: As described in Section I, Task 4, of the DSOW, the community facilities and services analysis will follow the guidance of the CEQR Technical Manual. The CEQR Technical Manual defines community facilities as public or publicly funded schools, libraries, child care centers, health care facilities, and fire and police protection.

Comment 4.11: Given the 9,520 new residents anticipated under the proposed actions, we expect a rigorous evaluation of the proposed action's impacts on the capacity of existing schools, child-care facilities, and libraries in the project area. The analysis should include the identification of mitigation measures such as the proposal of new community facilities in the project area to accommodate the added demand. (M12)(B10.1)(C9.1)

Response: As described in Section I, Task 4, of the DSOW, the community facilities and services analysis will follow the guidance of the CEQR Technical Manual. The CEQR Technical Manual provides for a rigorous evaluation methodology where a detailed analysis is warranted.

Comment 4.12: Increased population calls for improved and increased health services, and schools. (M6)(B10.1)

Response: As described in Section I, Task 4, of the DSOW, the RWCDs would not trigger detailed analyses of potential impacts on health care services. However, for informational purposes, a description of existing health care facilities serving the rezoning area will be provided in the EIS. However, as described in Task 4, the RWCDs would trigger a detailed analysis of elementary, intermediate, and high schools. As described in Section I, Task 20, of the DSOW, where significant adverse impacts have been identified, measures to mitigate those impacts will be described.

Comment 4.13: The youth need after school programs. (M6)(B10.1)

Response: Comment noted.

5. Open Space

Comment 5.01: The EIS should study the impact of the increased population on open space. (O1)(H1)(B10)(B10.1)(C9.1)

Response: As described in Section I, Task 5, of the DSOW, an assessment of both residential and nonresidential open space is warranted and will be provided in the EIS. The open space analysis will follow the guidance of the CEQR Technical Manual, and specific methodologies are described in Section I, Task 5, of the DSOW.

Comment 5.02: The first question is about Figure 8. Please confirm whether Census Tract 63 is supposed to be part of the study area, as it seems that it might be less than 50% within the radius. The second question is related to the project description. It's my understanding that there may be a plan for Lots 32 and 27 (on Figure 4b) to be transferred to HPD for housing development, with the idea that Corporal Fischer demapping would provide compensating replacement parkland. Is there a reason why this potential development and associated alienation isn't being included here? It seems like it could make for complications down the line if those are indeed intended for housing, since Corporal Fischer demapping would have already occurred and there wouldn't be a replacement to link with alienation of those parcels. (W4)

Response: Special consideration was given to Census Tract 63, which has less than 50 percent of its total land area within a ½-mile radius of the rezoning area, but which contains several large open spaces and is immediately adjacent to the rezoning area at its northern border. In order to account for Census Tract 63's unique position in this study only open spaces north of 161st Street were included in the analysis, while the entire population of the census tract was included in the analysis.

Any development to occur on Lots 32 and 27 would be subject to future city actions and would require environmental review at that time.

Comment 5.03: We will not accept a FEIS that does not acknowledge that the study area is underserved by open space, considering the poor condition of the existing open space, the lack of greenery and the lack of active space. (W8)

Response: As described in Section I, Task 5, of the DSOW, an assessment of both residential and nonresidential open space is warranted and will be provided in the EIS. The open space analysis will follow the guidance of the CEQR Technical Manual.

Comment 5.04: Is there adequate access to parks? (L3)

Response: As described in Section I, Task 5, of the DSOW, an assessment of both residential and nonresidential open space is warranted and will be provided in the EIS. The open space analysis will follow the guidance of the CEQR Technical Manual.

Comment 5.05: We request clarification on the results that the creation of Corporal Fischer Park will achieve: Lot 19 already appears to be zoned as a park and is owned by the NYC Department of Parks and Recreation, and yet the lot has been fenced off and closed to the public for years. Will the proposed map changes result in the development of this park as a usable public space? (W8)

Response:

While Lot 19 is under Department of Parks and Recreation ownership, the parcel is not mapped as parkland on the City Map. The City Map change would demap an adjacent mapped street and map it, along with all of Lot 19, as parkland, creating 0.49 acres of mapped parkland that will facilitate the future development of an integrated Corporal Fischer Park.

Comment 5.06: We strongly recommend a reconsideration of Jerome Playground, and encourage the City to consider swapping that site – which may be better suited to auto or other light industrial use given its proximity to the Cross-Bronx Expressway – with another site that is closer to residential development, easier for pedestrians to access, and less exposed to environmental pollutants created by the highway. (W8)(B10.1)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 5.07: MAS feels the project should include additional open space in the project area and examine utilizing the redevelopment of vacant sites or underutilized sites to create open space opportunities. (M12)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 5.08: The additional residents (9,520) and workers (1,016) anticipated under the proposed actions would place a demand on the limited existing open space resources in the project area. According to the *CEQR Technical Manual*, the Fordham neighborhood of the project area is currently underserved by open space. (M12)

Response: As described in Section I, Task 5, of the DSOW, there is “underserved” area in the Fordham neighborhood and an assessment of open space will be prepared for the EIS and will follow the guidance of the *CEQR Technical Manual*.

Comment 5.09: Zoning must also allow for the inclusion of recreational facilities that serve all ages. For example, senior centers offer vital opportunities for socialization, nutrition, and services for seniors. A wealth of resources, senior centers, and other recreational facilities can help improve a senior’s quality of life. (L3)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 5.10: Concerned about the state of playgrounds for the children. (M6)

Response: As described in Section I, Task 5, of the DSOW, an assessment of both residential and nonresidential open space is warranted and will be provided in the EIS. The open space analysis will follow the guidance of the CEQR Technical Manual. As described in Section I, Task 20, of the DSOW, where significant adverse impacts have been identified, measures to mitigate those impacts will be described.

Comment 5.11: Creating additional recreational green spaces is also a good opportunity to engage local artists and cultural institutions. Aside from art's ascetic value, it often serves as an important means of representing and preserving our unique heritage, while strengthening the bonds of our community. (6)

Response: Comment noted.

Comment 5.12: Moreover, developers should be required to utilize green technologies in new developments to help ensure a healthy environment for generations to come. Improving our existing parks and creating additional green spaces will not only help the neighborhood feel more breathable, but will encourage residents to take part in recreational outdoor activities that are beneficial to their physical and mental health. (6)

Response: Comment noted. This is outside the scope of CEQR.

Comment 5.13: As a Community Board, our top priority is to expedite the development of the proposed park side at 1805 Davidson Avenue, which is currently under the jurisdiction of ACS. We are requesting that the site be transferred to the Department of City-Wide Administrative Services. Currently a million dollars has been allocated for this effort, but these funds can't be utilized until the transfer takes place. (B10)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

6. Shadows

Comment 6.01: There is concern that the proposed high rises will block sunlight adjacent to existing buildings. (B8)

Response: As described in Section I, Task 6, of the DSOW, per guidance of the *CEQR Technical Manual*, a shadows analysis assesses whether new structures resulting from a proposed action would cause shadows on sunlight sensitive publicly accessible resources or other resources of concern, such as natural resources and historic features that are dependent on sunlight.

Comment 6.02: The EIS will assess the RWCDs on a site-specific basis for potential shadowing effects of new developments at both the projected and potential development sites. However, underbuilt multifamily buildings should be included in the criteria for selecting projected and potential sites and be reflected in the detailed shadows assessment. (M12)(B10.1)

Response: As described in Section I, Task 6, of the DSOW, per guidance of the *CEQR Technical Manual*, a shadows analysis assesses whether new structures resulting from a proposed action would cause shadows on sunlight sensitive publicly accessible resources or other resources of concern, such as natural resources and historic features that are dependent on sunlight.

Comment 6.03: We expect the EIS will include an evaluation of potential shadow impacts on the Morris Avenue Historic District, which is within the project area, and the Grand Concourse Historic District, which is within the 400-foot study area. (M12)

Response: As described in Section I, Task 6, of the DSOW, per guidance of the *CEQR Technical Manual*, a shadows analysis assesses whether new structures resulting from a proposed action would cause shadows on sunlight sensitive publicly accessible resources or other resources of concern, such as natural resources and historic features that are dependent on sunlight.

7. Historic and Cultural Resources

No comments.

8. Urban Design and Visual Resources

Comment 8.01: The proposed action will result in a change in building height, and will potentially invite changes to the existing character of this area, which has long been home to industrial and manufacturing buildings. On side streets like Inwood Avenue and Crowell Avenue, simple brick facades are still visible, while on main streets like 170th Street, 167th Street, and Mount Eden Avenue, more detailed facades in brick and stone are hidden behind decades of additions and signage. We encourage the City to consider creating guidelines – for building height limits, façade

materials and colors, signage sizes and standards – that would preserve the existing warehouse/manufacturing building character. (W8)(B10.1)(C9.1)

Response: As described in Section I, Task 8, of the DSOW, the Proposed Actions would rezone some areas to allow higher density and create new zoning districts to be mapped within the study area, a preliminary assessment of urban design and visual resources will be provided in the EIS. In addition, when an action would potentially obstruct view corridors, compete with icons in the skyline, or would result in substantial alterations to the streetscape of the neighborhood by noticeably changing the scale of buildings, a more detailed analysis of urban design and visual resources would be appropriate.

As described in Section I, Task 18, of the DSOW, a preliminary assessment of neighborhood character will be provided in the EIS to determine whether changes expected in other technical analysis area – land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; transportation; and noise – may affect a defining feature of neighborhood character. If the preliminary assessment determines that the Proposed Actions could affect the defining features of neighborhood character, a detailed analysis will be conducted.

Comment 8.02: The proposed project would significantly affect the public realm within the project area. MAS recommends that design guidelines are put in place for redevelopment under the Jerome Avenue Special District that includes streetscape improvements, open space improvements, and building design. (M12)(B10.1)(C9.1)

Response: As described in Section I, Task 8, of the DSOW, the an analysis of urban design and visual resources will be included in the EIS. This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

9. Hazardous Materials

Comment 9.01: For new development, is the land being analyzed for pollutants? (M6)

Response: As described in Section I, Task 9, of the DSOW, the hazardous materials analysis will follow the guidance of the *CEQR Technical Manual*; the specific methodologies for the analysis are described in Task 9 and include a preliminary screening assessment for the projected and potential development sites to determine which sites warrant an institutional control, such as an (E) designation, in accordance with Section 11-15 (Environmental Requirements) of the Zoning Resolution of the City of New York and Chapter 24 of t Title 15 of the Rules of the City of New York governing the placement of (E) designations.

Comment 9.02: We expect the EIS will include the findings and recommendations from anticipated Phase I Environmental Site Assessments (ESA), Phase II Environmental Site Investigations (ESI) on development sites in the project area and the reports will be made publicly available. (M12)

Response: As described in Section I, Task 9, of the DSOW a hazardous materials assessment will be prepared as part of the EIS, which includes a preliminary screening assessment of the projected and potential development sites to determine which sites warrant an institutional control, such as an (E) designation, in accordance with Section 11-15 (Environmental Requirements) of the Zoning Resolution of the City of New York and Chapter 24 of Title 15 of the Rules of the City of New York, governing the placement of (E) designations. A summary of findings and conclusions will be included in the EIS.

10. Water and Sewer Infrastructure

No comments.

11. Solid Waste and Sanitation Services

Comment 11.01: The EIS should study the impact of the increased population on local sanitation services. (B11)(C9.1)

Response: As described in Section I, Task 11, the EIS will include analysis of solid waste and sanitation services in order to assess the potential impacts of the Proposed Actions' solid waste generation (projected developments) on the City's collection and disposal capacity.

12. Energy

No comments.

13. Transportation

13.1 General

Comment 13.01: The transportation analysis should consider where people want to go, and how to get them there safely and conveniently. (D1)(B10.1)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues

referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment 13.02: The EIS should analyze whether there are transportation options available and accessible to seniors. (L3)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, the transportation analyses follow the guidance of the CEQR Technical Manual for analyzing traffic, transit, pedestrian, and parking conditions.

Comment 13.03: Are transportation options available and accessible? (L3)

Response: This comment address issues outside of the Environmental Impact Statement Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

13.2 Traffic

Comment 13.04: Traffic (page 45) - Please have the consultant modify the last sentence in the first paragraph to "...additional vehicle trips per hour or at known congested locations." Also, on page 47 (third bullet) after parking regulations include "and vehicle queue lengths." In addition, in fourth bullet please modify the third line to "...lane group, per intersection approach and per overall intersection."(C9)

Response: The Final Scope of Work has included these revisions.

Comment 13.05: There should be a traffic study on the Washington Bridge that provides connection from Manhattan to the Bronx. The increase in population will severely burden the bridge and its failing infrastructure. (D3)(B10.1)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, the EIS will include a detailed traffic analysis for the Washington Bridge on- and off-ramp intersections at University Avenue for the weekday AM, midday, and PM peak hours, as well as the Saturday midday peak hour.

Comment 13.06: The EIS must include the effect that traffic congestion will have on the primary and secondary study because of the lack of parking. The study must expand to a 1 mile radius of the primary study. Particularly because the zoning includes the areas close to two major stadiums and because the community districts are already highly dense. Stalled traffic will attribute to high pollution. (T3)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, the intersections to be included in the traffic study area will be determined based on the assignment of project-generated traffic and the threshold of 50 additional vehicle trips per hour.

Comment 13.07: The EIS study must include detailed traffic analysis for the areas within the 1 mile radius.

This includes the traffic along. (T3)(B10.1)

Response: As described in Section I, Task 13, of the DSOW, the intersections to be included in the traffic study area will be determined based on the assignment of project-generated traffic and the threshold of 50 additional vehicle trips per hour.

Comment 13.08: The Transportation Study designates Cromwell Avenue but not Inwood Avenue as a “local roadway.” Our observations of Inwood Avenue suggest that it is similar to Cromwell Avenue, in that it is not a significant draw for pedestrians but it does generate significant auto traffic due to its numerous auto-related uses. We suggest that Inwood Avenue also be considered an important local roadway and be incorporated in the EIS study and findings accordingly. (W8)

Response: As described in Section I, Task 13, of the DSOW, the intersections to be included in the traffic study area will be determined based on the assignment of project-generated traffic and the threshold of 50 additional vehicle trips per hour – this includes the 170th Street intersections at Cromwell and Inwood avenues.

Comment 13.09: We recommend that the FEIS include projections for increased truck traffic based on the increased retail square footage, and consider potential mitigations to prevent this increased demand from negatively impacting traffic flow and pedestrian experience. (W8)(B10.1)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, the net change in vehicle trips (including truck trips) expected to be generated by projected development sites under the Proposed Actions will be determined. Future With-Action traffic and pedestrian conditions will be determined and potential mitigation measures will be identified as appropriate if significant adverse traffic impacts are projected.

Comment 13.10: DCP notes that the Transportation Study’s recommendations were shared with NYC Department of Transportation (DOT) and that proposed treatments were developed together. We recommend that the FEIS include discussion of when and how these treatments might be implemented. (W8)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 13.11: The analysis of the intersection of Jerome Avenue, East 168th Street and Gerard Avenue should include the adjacent intersection of East 169th Street and Gerard Avenue. (W8)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space,

Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 13.12: We recommend that the EIS traffic study include the intersection of Inwood Ave at West Mount Eden Ave. (W8)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, the intersections to be included in the traffic study area will be determined based on the assignment of project-generated traffic and the threshold of 50 additional vehicle trips per hour.

Comment 13.13: Based on community input, traffic congestion has been identified as a major problem within the project area. The additional residents and workers anticipated under the proposed actions will only worsen conditions. The proposal should include recommendations from the Jerome Avenue Transportation Study, especially with regard to proposed improvements to reduce vehicular congestion and improve pedestrian and bicycle access. (M12)(B10.1)(C9.1)

Response: Comment noted.

Comment 13.14: We request that the EIS include data on drivers who work but do not live in the study area, as this appears to make up a significant percentage of people who drive to the study area. (W8)

Response: As described in Section I, Task 13, of the DSOW, the transportation analyses follow the guidance of the CEQR Technical Manual for analyzing the traffic study area.

13.3 Parking

Comment 13.15: Pages 2 and 5 of the DSOW, state that the proposed action seeks to provide opportunities for high quality affordable housing with options for a wide range of income levels, it appears that the RWCDs, where a substantial portion of residential units will be affordable and no accessory parking would be required for affordable units, will have 40 more accessory parking spaces than the No Action, which has no guarantees for affordability. Please provide the distribution (number/percent) of 993 accessory parking allocated to non-affordable residential units, local retail, office, FRESH supermarket and restaurant. (C9)

Response: Please refer to the development scenario table in the Final Scope of Work for information on development sites.

Comment 13.16: Parking (page 50) – Please have the consultant include the following sentence “If the initial on- and off-street parking assessment shows conditions at or near capacity, then a parking assessment will be conducted up to a ½-mile radius to determine if capacity is available to accommodate the projected demand.” (C9)(C9.1)

Response: Comment noted. Text revised for FSOW.

Comment 13.17: The impact on parking must be analyzed. (D4)(L1)(B10.1)

Response: As described in Section I, Task 13, of the DSOW, a detailed on- and off-street parking inventory and analysis will be provided in the EIS.

Comment 13.18: The number of available on-street parking spaces identified within a mile radius of the rezoning area this must include the construction parking demand to determine if a significant adverse parking impact would occur. The mile is necessary because of construction in the Kingsbridge Armory and Lower Concourse. The new influx of residents will have a tremendous impact on parking in already dense area. (T3)

Response: As described in Section I, Task 19, of the DSOW, the EIS construction analysis for Transportation Systems (including parking) will follow the guidance of the CEQR Technical Manual.

Comment 13.19: The number of available on-street parking spaces identified in the primary and secondary land use study within a mile radius of the rezoning area. When parking is scarce in an already dense area this will result in residents parking further in order to secure a parking spot. Continuous circulation can result in traffic congestion, particularly during at the end of the work day. (T3)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, the EIS parking analysis will document changes in the parking supply and utilization in the rezoning area and within a ¼-mile radius of the rezoning area under No-Action and With-Action conditions. Localized parking conditions during the weekday midday and overnight periods will also be assessed for a sub-area encompassing a ¼-mile radius around the three largest projected development sites.

Comment 13.20: The EIS study must include the amount of parking spaced needed in order to accommodate the new influx of residents. Community districts 4 and 5 are highly dense areas and the study needs to assess the direct and indirect impact of new influx of residents would have on parking in the primary and secondary area. In order to properly assess the EIS study must expand to a 1 mile radius of the primary study area. (T3)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, the EIS parking analysis will document changes in the parking supply and utilization in the rezoning area and within a ¼-mile radius of the rezoning area under No-Action and With-Action conditions. Localized parking conditions during the weekday midday and overnight periods will also be assessed for a sub-area encompassing a ¼-mile radius around the three largest projected development sites.

Comment 13.21: The study must review the impact that the two stadiums will have on parking in the primary and secondary land use study area. (T3)

Response: As described in Section I, Task 13, of the DSOW, the EIS parking analysis will document changes in the parking supply and utilization in the rezoning area and within a ¼-mile radius of the rezoning area under No-Action and With-Action conditions during the weekday midday and overnight periods.

Comment 13.22: With regard to parking, we recommend that the EIS include analysis and recommendations for parking that serves the auto and industrial uses, which otherwise are forced to park cars on the sidewalk or double-park in the street. (W8)

Response: As described in Section I, Task 13, of the DSOW, the transportation analyses follow the guidance of the CEQR Technical Manual for parking analysis.

Comment 13.23: Private vehicle parking is now an issue and the issue will intensify. (M6)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, the transportation analyses follow the guidance of the CEQR Technical Manual for parking analysis.

13.4 Pedestrian Safety

Comment 13.24: Vehicular and Pedestrian Safety (page 50) – Please have the consultant include a write-up on Vision Zero effort (<http://www.nyc.gov/html/dot/downloads/pdf/ped-safety-action-planbronx.pdf>) and identify those Vision Zero Priority Corridors (Appendix A) or Intersections (Appendix B) within the study area. Also, in the first sentence please change “traffic accidents” to “traffic crashes.” (C9)(C9.1)

Response: Comment noted. Text revised for FSOW.

Comment 13.25: We recommend assessments at the Cross-Bronx Expressway interchange and consider the impact of this congested intersection on the health of pedestrians and public space users. Assessment of environmental impacts at this location are especially important if the proposed action and neighborhood plan are to promote increased use of pedestrian crossings and public spaces around the interchange. (W8)

Response: The EIS will include a detailed particulate matter (PM 2.5) analysis of the Cross Bronx Expressway, consistent with the guidelines published in the CEQR Technical Manual.

Comment 13.26: As DCP has noted, the intersection of Jerome Avenue, East 167th Street and Edward L. Grant Highway is dangerous and in need of improvement. We commend the DCP Transportation Division’s Cromwell Avenue – Jerome Avenue Transportation Study recommendations to improve safety for drivers, pedestrians and cyclists at this intersection; the study includes two proposals that would reduce traffic hazards and increase pedestrian space. As mentioned above, we foresee increased conflict between the proposed high-rise residential developments and preserved industrial use in this area, and we hope that improvements to this intersection will ease some of that conflict. (W8)(C9.1)

Response: Comment noted.

Comment 13.27: Are sidewalks and crosswalks even-surfaced? (L3)(C9.1)

Response: Outside scope of CEQR

13.5 Transit/Pedestrians

Comment 13.28: Travel Demand and Screening Assessment (page 45) - Please have the consultant state the *CEQR Technical Manual* as part of the standard sources. The comment also applies to the fifth bullet on page 47. In addition, in the last sentence of the opening paragraph please change "...trip assignment (a Level-2 screening assessment) has been (instead of will be) to validate the intersections and pedestrian/transit elements selected for analysis." (C9)

Response: Comment noted. Text revised for FSOW.

Comment 13.29: Pedestrians (page 49) – Similar to the intersection analysis list on page 46, please have the consultant include those pedestrian elements that exceed the CEQR thresholds. (C9)(C9.1)

Response: Comment noted. Text revised for FSOW.

Comment 13.30: The impact on public transportation, in particular the 4 Train, must be analyzed. (H1)(3)(M6)(D1)(R1)(O1) (M6)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, per the guidance of the *CEQR Technical Manual*, a subway line haul analysis will be provided in the EIS for subway routes in which the Proposed Actions are expected to generate 200 or more new subway trips in one direction.

Comment 13.31: Elevators and/or escalators are needed at the Burnside subway station. (P2)(W5)(M6)(B11)(O1)(2)(T1)(B14) (M6)(C9.1)

Response: Comment noted.

Comment 13.32: The secondary land use study must include the impact that the rezoning will have on the B/D train from Kingsbridge Road to 145th Street and the impact it will have on the BX12 Bus. This increase in residents will result in an increase ridership and this will have a secondary indirect impact on transportation congestion. The EIS study must include an analysis on the impact that the zoning will have on ridership on the B/D train and the BX 12 Select Bus. (T3)(C9.1)

Response: As described in Section I, Task 13, of the DSOW, subway line-haul conditions will be assessed in the EIS for those subway routes projected to experience an increase of 200 or more new subway trips in one direction as a result of the Proposed Action. Similarly, if the incremental person-trips by bus generated by the Proposed Actions would exceed 50 peak hour trips in one direction on a bus route serving the rezoning area, the EIS will include a quantitative analysis of local bus conditions.

Comment 13.33: The EIS study must determine volumes and conditions at analyzed subway station elements in the future without the Proposed Actions using approved background growth rates and accounting for any trips expected to be generated by No-Action development on projected development sites or other major projects in the vicinity of the study area. (T3)

Response: As described in Section I, Task 13, of the DSOW, the EIS will determine passenger volumes and conditions at analyzed subway station elements in the future without the Proposed Actions using approved background growth rates and accounting for any trips expected to be generated by No-Action development on projected development sites or other major projects in the vicinity of the study area.

Comment 13.34: We affirm the community's repeated requests for the EIS to study and consider seriously the impact of the proposed rezoning on the transit infrastructure, particularly the already overcrowded 4/B/D MTA train lines. (W8) (M12)

Response: As described in Section I, Task 13, of the DSOW, subway line-haul conditions will be assessed in the EIS for those subway routes projected to experience an increase of 200 or more new subway trips in one direction as a result of the Proposed Action.

Comment 13.35: We affirm the importance of studying the need for ADA accessible transit stations as well. (W8)

Response: As described in Section I, Task 13, of the DSOW, the transportation analyses follow the guidance of the *CEQR Technical Manual* for analyzing transit stations.

Comment 13.36: SBS Bus Rapid Transit service should be implemented along the Jerome Avenue Corridor. (U1)(C9.1)

Response: As described in Section I, Task 13, transportation analyses, including transit analyses, will be prepared for the EIS. These analyses will be conducted per the guidance of the *CEQR Technical Manual*. If warranted, mitigation for any significant adverse impacts related to transportation, would be developed in accordance with the guidance of the *CEQR Technical Manual*.

14. Air Quality

Comment 14.01: There is no place to park, which results in idling and pollution. This will exacerbated by population growth. (B11)

Response: As described in Section I, Task 14, of the DSOW, an air quality assessment is required for actions that could have potential to result in significant air quality impacts. There are mobile source impacts that could arise when an action increases or causes a redistribution of traffic, creates any other mobile sources of pollutants, or adds new uses near existing mobile sources. There are mobile source impacts that could be produced by parking facilities, parking lots, or garages. The increased traffic associated with the RWCDS projected development sites would have the potential to affect local air quality levels. Please refer to Task 14 for a detailed explanation of the air quality assessment methodology.

Comment 14.02: The EIS should analyze the impact on the air that construction will have. (M13)(B4)(B10.1)

Response: As described in Section I, Task 19, of the DSOW, construction impacts are usually important when construction activity has the potential to affect transportation conditions, archaeological resources and the integrity of historic resources, community noise patterns, air quality conditions and mitigation of hazardous materials. The construction air quality impact section will include a quantitative discussion of both mobile air source emissions from construction equipment and worker and delivery vehicles, as well as fugitive dust emissions. It will provide measures to reduce impacts.

Comment 14.03: The study must assess the direct and indirect impact that the Kingsbridge Armory, Lower Concourse and Jerome Avenue rezoning will have on the asthma rates in the study area. Emissions of air quality pollutants from construction from the Kingsbridge Armory, Jerome Avenue and Lower Concourse will add on-site construction machinery and activity as well as the movement of construction-related vehicles on Jerome Avenue. This will result in an increase of pollution and it must be assessed. (T3)(B10.1)

Response: The EIS will include a detailed construction air quality analysis consistent with the guidelines published in the *CEQR Technical Manual*.

Comment 14.04: The study must assess the 12 blocks that are in between the Lower Concourse and the Jerome Avenue rezoning in order to determine the effects that the increased congestion will have on asthma rates. The 12 blocks is bounded by the Harlem River to the West, Morris Avenue to the East, Yankee Stadium-161st Street to the North and 149th Street to the South. The Jerome Avenue re-zoning is 3 blocks away from Yankee Stadium. (T3)

Response: The EIS will include a detailed analysis of air quality particulate matter (PM 2.5), consistent with the guidelines published in the *CEQR Technical Manual*

Comment 14.05: The EIS must assess the air quality on 12 River Avenue, Gerard Avenue, Walton Avenue, E. 154rd Street and E. 157th Street. The EIS must also include the asthma rates within these 12 blocks. (T3)

Response: The EIS will include a detailed analysis of air quality particulate matter (PM 2.5), consistent with the guidelines published in the *CEQR Technical Manual*

Comment 14.06: The study must assess the impact that the increase of pollution will have on the neighborhoods closest to the following bridges. All the bridges need to be assessed because games being held in Yankee Stadium and the Kingsbridge Armory will attract tourism from all over New York City and New York state. (T3)(B10.1)

Response: The EIS will include a mobile source analysis for particulate matter (PM 2.5), consistent with the guidelines published in the *CEQR Technical Manual*.

15. Greenhouse Gas Emissions

No comments.

16. Noise

Comment 16.01: We encourage DCP to consider any and all possible treatments that might reduce the noise under the elevated line. (W8)

Response: As described in Section I, Task 16, of the DSOW, the noise analysis will examine both the Proposed Actions' potential effects on sensitive noise receptors (including residences, health care facilities, schools, open space, etc.) and the potential noise exposure at new sensitive uses introduced by the actions. If significant adverse impacts are identified, impacts would be mitigated or avoided to the greatest extent practicable.

17. Public Health

Comment 17.01: The EIS should identify innovative mitigation measures that seek to improve air quality, provide better access and more options for fresh fruits, vegetables and healthier foods. (R3)(B10.1)(C9.1)

Response: As described in Section I of the DSOW, the EIS will include a statement of the environmental impacts of the Proposed Actions, including short- and long-term effects and typical associated environmental effects; the EIS will also include a description of mitigation proposed to eliminate or minimize any significant adverse environmental impacts. The analyses that will be conducted for the EIS are outlined and their methodologies described in Section I of the DSOW; the analysis of air quality is described in Section I, Task 14, of the DSOW. Please also see the response to Comment 1.03 and Section H of the DSOW for a description of the analysis framework; the incremental difference between the Future No-Action and Future With-Action conditions will serve as the basis for the impact analyses of the EIS.

Comment 17.02: We are concerned about the health implications of the rezoning. The Bronx has some of the worst environmental and health conditions in the City. (B7)

Response: As described in Section I, Task 17, of the DSOW, per the guidance of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the Proposed Actions in any of these

technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas.

Comment 17.03: The EIS study must evaluate the amount of respiratory illnesses within the primary study area. (T3)

Response: As described in Section I, Task 17, of the DSOW a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the Proposed Actions in any of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas.

Comment 17.04: The Bronx has high rates of Asthma and other air related illness. (D3)

Response: As described in Section I, Task 17, of the DSOW a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the Proposed Actions in any of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas.

Comment 17.05: The Proposed Actions will impact the health and wellness of the community. (B11)

Response: As described in Section I, Task 17, of the DSOW, per the guidance of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the Proposed Actions in any of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas.

Comment 17.06: We recommend that this Task include an analysis of street trees and green open space and notes the positive impact that these amenities can have on public health. Trees and green space can reduce air pollution, provide shade, and divert water from entering the City's combined sewer system, plus they can provide spaces for active and passive recreation. (W8)(B10.1)

Response: This is outside the scope of CEQR. Section I, Task 14, describes the manner in which air quality analyses will be conducted for the EIS, per the guidance of the *CEQR Technical Manual*.

Comment 17.07: We also recommend that this Task analyze and seriously consider the impact of the Proposed Actions on family stress and the health of families and children in the Jerome Rezoning area. (W8)

Response: This is outside the scope of CEQR.

Comment 17.08: Many factors contribute to health disparities and the rezoning process gives us the opportunity to improve upon some of them, including our air quality. (6)(B10.1)(C9.1)

Response: This is outside the scope of CEQR. Section I, Task 14, describes the manner in which air quality analyses will be conducted for the EIS, per the guidance of the *CEQR Technical Manual*.

Comment 17.09: Promoting better neighborhood health by creating access to healthy and affordable food options is yet another important step we must take to reduce the rate of chronic illnesses. When considering an economic development plan for the area, we must encourage current and future businesses to invest in the immediate community by making healthy foods a priority. (6)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work and refers to an independent DCP-led transportation study. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 17.10: Hospitalization for asthma among children five to fourteen is over one and a half times the city-wide rate, and that has to do with air pollution, which High Bridge and Concourse rank number 11th in terms of air pollution. (R3)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work and refers to an independent DCP-led transportation study. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 17.11: The auto industry should be completely relocated for public health. (O1)

Response: Comment noted.

Comment 17.12: The obesity rate in our area is three times higher than the city norm. Diabetes is 15 percent higher than the rest of New York City. (R3)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work and refers to an independent DCP-led transportation study. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 17.13: We have a lot of issues in terms of health; obesity, diabetes, asthma, infant mortality, heart failure. (B11)(B10.1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work and refers to an independent DCP-led transportation study. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment,

among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 17.14: We must think through strategies that improve the health outcomes in our community, integrate community well-being more holistically with our planning process, and provide access to better supermarkets and to grow our existing food industry.(2)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work and refers to an independent DCP-led transportation study. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 17.15: Is there an adequate supply of healthcare providers? (L3)

Response: As described in Section I, Task 4, of the DSOW, the RWCDS would not trigger detailed analyses of potential impacts on health care services. However, for informational purposes, a description of existing health care facilities serving the rezoning area will be provided in the EIS.

18. Neighborhood Character

Comment 18.01: As noted above, WHEDco strongly believes that the existing auto industry is a defining feature of the existing neighborhood character. The proposed actions will undoubtedly affect this defining feature, and thus we believe a detailed analysis must be conducted. Further, we recommend that the proposed action be adapted to better preserve the auto industry, by expanding the retention areas, adding protections to the retention areas that strengthen the auto industry, and creating design guidelines that protect and preserve the industrial character of the buildings in the study area. (W8)

Response: As described in Section I, Task 18, of the DSOW, a preliminary assessment of neighborhood character will be provided in the EIS to determine whether changes expected in other technical analysis area – land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; transportation; and noise – may affect a defining feature of neighborhood character. If the preliminary assessment determines that the Proposed Actions could affect the defining features of neighborhood character, a detailed analysis will be conducted.

Comment 18.02: The City scope supports the erasure of the local economy and culture and environmental landscape of Jerome Avenue. (W2)(B10.1)

Response: Comment noted.

19. Construction

Comment 19.01: When there's new construction, there must be adequate protection given to homeowners from adverse impacts. (B3)(B10.1)(C9.1)

Response: As described in Section I, Task 19, of the DSOW, construction impacts are usually important when construction activity has the potential to affect transportation conditions, archaeological resources and the integrity of historic resources, community noise patterns, air quality conditions, and mitigation of hazardous materials. The EIS will provide a preliminary impact assessment, which will evaluate the duration and intensity of the disruption or inconvenience to nearby sensitive uses. The construction analysis will follow the guidance of the *CEQR Technical Manual*, and if the preliminary assessment indicates the potential for a significant impact during construction, a detailed construction analysis will be undertaken and reported in the EIS. In addition, as described in Section I, Task 20, of the DSOW, where significant adverse impacts have been identified in Tasks 2 through 19, measures to mitigate those impacts will be described.

Comment 19.02: The scope should look into the direct impact of both potential/ proposed development on the rat population. When there is construction of a building, there is more a disturbance from rats in the area around construction. Since there is a proposal for rezoning of 73 blocks we must consider the health issues that may arise because of rats coming up from the ground. (D3)(B10.1)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work and refers to an independent DCP-led transportation study. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 19.03: The environmental study must include the average daily on-site construction workers and trucks would be forecasted for each projected development, including the Jerome Avenue, Kingsbridge Armory and Lower Concourse zoning. (T3)(C9.1)

Response: As described in Section I, Task 19, of the DSOW, the EIS construction analysis for Transportation Systems (including parking) will follow the guidance of the *CEQR Technical Manual*.

Comment 19.04: Given the scale of the project and the potential for multiple sites to be under construction at the same time, the construction analysis needs to include detailed evaluation of construction traffic, air quality, and noise, especially with regard to impacts on residential areas, schools, and medical facilities. (M12)(B10.1)(C9.1)

Response: As described in Section I, Task 19, of the DSOW, multi-sited projects with overall construction periods lasting longer than two years and that are near to sensitive receptors should undergo a preliminary impact assessment, which will evaluate the duration and intensity of the disruption or inconvenience to nearby sensitive uses. The construction analysis will follow the guidance of the *CEQR Technical Manual*.

Comment 19.05: As it pertains to housing and development, it is my expectation that developers will be held to high standards to mitigate dust and airborne pollutants like asbestos from entering the surrounding environment during the construction phase. (6)

Response: As described in Section I, Task 19, of the DSOW, construction impacts are usually important when construction activity has the potential to affect transportation conditions, archaeological resources and the integrity of historic resources, community noise patterns, air quality conditions, and mitigation of hazardous materials. The EIS will provide a preliminary impact assessment, which will evaluate the duration and intensity of the disruption or inconvenience to nearby sensitive uses. The construction analysis will follow the guidance of the *CEQR Technical Manual*, and if the preliminary assessment indicates the potential for a significant impact during construction, a detailed construction analysis will be undertaken and reported in the EIS. In addition, as described in Section I, Task 20, of the DSOW, where significant adverse impacts have been identified in Tasks 2 through 19, measures to mitigate those impacts will be described.

Comment 19.06: Areas around the new construction should be baited to avoid the spread of rats. (B3)

Response: Comment Noted.

Comment 19.07: We are concerned that the City is not considering the safety requirements to build these buildings. (G3)(S4)(W1)(K2)(V1)

Response: Comment Noted.

Comment 19.08: We are concerned that the City is not considering the safety requirements to build these buildings, human forces to build the structures, the potential health and safety risks of development, the local impact, new programs that help the community upgrade their education and skills. (B3)(B10.1)

Response: Comment Noted.

Comment 19.09: With the increased building and disruption of land there will be an increase of air pollution (due to increase vehicle emissions). (M6)

Response: Section I, Task 14, describes the manner in which air quality analyses will be conducted for the EIS, per the guidance of the *CEQR Technical Manual*. As described in Task 14, a mobile source analysis of air quality will be prepared for the EIS. In addition, as described in Section I, Task 19, of the construction air quality impact section will include a quantitative discussion of

both mobile air source emissions from construction equipment and worker and delivery vehicles, as well as fugitive dust emissions. It will provide measures to reduce impacts.

20. Alternatives

Comment 20.01: Many things have to be looked at for this EIS, but many of the things that are in the scope of the EIS are not addressed. Is there monitoring in place to keep track of what needs to take place? (M6)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work and refers to an independent DCP-led transportation study. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment 20.02: We recommend that the EIS study an alternative that adds an additional retention area and/or expands current retention areas to capture more existing auto businesses. We recommend an additional retention area on the east side of Jerome Avenue between East 172nd Street and the Cross-Bronx Expressway, but we would consider other locations. (W8)(B10.1)

Response: Comment noted.

Comment 20.03: To mitigate the potential impact, the EIS should consider alternatives including, but not limited to, limiting the permitted uses to preserve the existing uses (similar to the Tribeca Special Mixed Use District); limiting the sites that can be converted from manufacturing to residential (similar to zoning restrictions found in the Special Hudson Square District); and increasing the amount of space that will remain zoned for manufacturing. (7)(C9.1)

Response: Comment noted.

Comment 20.04: Recommendations to improve the Cross-Bronx Expressway ramps seem to focus on making the area more efficient for cars, but do not directly address improvements that would make the area safer for pedestrians. Any mitigation in this area should include treatments that would make walking along Jerome Avenue across the ramps safer for pedestrians. (W8)

Response: Comment noted.

Comment 20.05: In order to reduce any potential impact, the EIS should study alternatives, including but not limited to, creating deeper levels of affordable housing in the MIH program, increasing the total number of affordable housing units required, and preserving more manufacturing space, which would reduce the number of new residents being added. (7)(C9.1)

Response: The alternative proposed in the comment would be counter to the goals of the land use proposal to balance land uses to support the development of affordable housing and neighborhood-serving commercial uses.

Comment 20.06: I believe that my suggestions and the plan presented by the Bronx Coalition for a Community Vision lays out a roadmap to achieve progress and change without exploitation, harassment, and displacement. (K2)

Response: Comment noted.

Comment 20.07: I believe that we are at a moment where we face a challenge to do zoning in a different way. I believe that my suggestions and the plan presented by the Bronx Coalition for a Community Vision lays out a roadmap to achieve progress and change without exploitation, harassment, and displacement. (K2)

Response: Comment noted.

Comment 20.08: An alternative proposal should be considered in the scope of the analysis for the environmental review that rezones C8-3 and M1-2 preservation areas to R8A with C2-4 commercial overlays.(S3)(H4)(E1)(S9)(B10.1)(C9.1)

Response: Comment noted.

Comment 20.09: Request that Block 2872 Lots 170, 179, and 182 (1441, 1445, and 1455 Cromwell Avenue) be rezoned from C8-3 to R8A. (B1)

Response: Comment noted.

Comment 20.10: Request that Block 2865, Lot 134 be rezoned from R7-1 to R8. (C6)

Response: Comment noted.

Comment 20.11: In order to reduce any potential impact, the EIS should study alternatives, including but not limited to, creating deeper levels of affordable housing in the MIH program, increasing the total number of affordable housing units required, and preserving more manufacturing space, which would reduce the number of new residents being added. (7)

Response: Comment noted.

Comment 20.12: Our properties are currently zoned M1-2 and struggle to be profitable and are stuck in time. We need to be rezoned. (S9)

Response: Comment noted.

21. Mitigation

Comment 21.01: WHEDco seeks clarification about the mitigations that will be included in this Task. While these mitigations will be developed and coordinated with the responsible City/State agencies, is there any guarantee that said agency will complete the mitigation? We recommend that the proposed action make these mitigations legally binding, especially those mitigations that resolve significant adverse impacts. Again, we support the creation of a task force made up of elected officials, agency representatives and community residents that will have the power to hold the City accountable to fulfilling the neighborhood plan and will monitor and publicly report on the progress of the plan. (W8)

Response: As described in Section I, Task 20, of the DSOW, the EIS will include consideration of measures to mitigate impacts identified in the EIS analyses. These measures will be developed and coordinated with the responsible City/State agencies, as necessary, including the LPC, DOT, DPR, and DEP. Where impacts cannot be fully mitigated, they will be described as unavoidable adverse impacts.

Comment 21.02: Another way to improve upon the air quality in the South Bronx is to remedy the traffic congestion that already plagues the area. I suggest the MTA and Department of Transportation work to add more public transit to the area to meet future transportation demands resulting from the influx of new people who will be living in the area. (6)

Response: As described in Section I, Task 14, of the DSOW a mobile source analysis of air quality will be prepared for the EIS. As described in Section I, Task 13, traffic and transit analyses will be prepared for the EIS. These analyses will be conducted per the guidance of the *CEQR Technical Manual*. If warranted, mitigation for any significant adverse impacts to air quality or for impacts determined in other analyses, such as impacts to transit, would be developed in accordance with the guidance of the *CEQR Technical Manual*.

Comment 21.03: Mitigation measures should include funding to improve mobility and to increase and promote healthy living. (R3)

Response: Comment noted.

D. GENERAL COMMENTS

D.1 NEIGHBORHOOD/COMMUNITY

Comment D-01: We must protect the integrity of our homeowners' property, the quality of our housing stock, our local landmarks, and the environment. (P2)(B10.1)

Response: Comment noted.

Comment D-02: There is so much building activity happening, but still there's so many homeless and so many storage facilities. (H1)

Response: Comment Noted.

Comment D-03: Any redevelopment within the Jerome Avenue corridor must prioritize the best interests of the residents in the surrounding community where the rezoning will take place. (6)

Response: Comment Noted.

Comment D-04: Developers should be required to utilize green technologies in new developments to help ensure a healthy environment for generations to come. (6)

Response: This is outside the scope of CEQR. However, as described in Section I, Task 20, of the DSOW, where significant adverse impacts have been identified, measures to mitigate those impacts will be described.

Comment D-05: Homeowners strengthen the community for younger generations. (B3)

Response: Comment Noted.

Comment D-06: Improving our existing parks and creating additional green spaces will not only help the neighborhood feel more breathable, but will encourage residents to take part in recreational outdoor activities that are beneficial to their physical and mental health. (6)

Response: Comment noted.

Comment D-07: Creating additional recreational green spaces is also a good opportunity to engage local artists and cultural institutions. Aside from art's ascetic value, it often serves as an important means of representing and preserving our unique heritage, while strengthening the bonds of our community. (6)

Response: Comment noted.

Comment 8.01: We encourage DCP to consider exterior lighting requirements that may improve nighttime visibility and safety under the elevated line. (W8)(B10.1)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues

referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

D.2 SUPPORT FOR/OPPOSITION TO PROPOSED ACTIONS

Comment D-08: In principle, Community Board 4 supports the proposed rezoning and the related actions. (S3)(P3)(H4)

Response: Comment noted.

Comment D-09: I don't support this Jerome Avenue rezoning plan.(L3)(V4)(F1)(F2)(F4)(G1)(S1)(C13)(Q1)(C11)(L2)(A3)(D7)

Response: Comment noted.

Comment D-10: I'm here to affirm the general direction of the plan, the housing initiative that the Mayor has proposed. I believe that new housing units are greatly needed in our community. (R4)(B10.1)

Response: Comment Noted.

Comment D-11: The Bronx has historically been a forgotten borough with no real investments in our schools, transportation, housing or jobs. I am happy to learn that the borough where I grew up in and where my family still resides, is finally being given the attention that it so badly needs. (V1)(B10.1)

Response: Comment noted.

Comment D-12: The majority of the community doesn't want this rezoning at all and wants the policy platform of the Bronx Coalition for a Community Vision to be adhered to. (C8.1C9)

Response: Comment noted.

Comment D-13: I urge the city and Department of City Planning to not move forward with the certification of this rezoning until all social impacts have been fully studied or we as a community will say no to the Jerome Avenue rezoning. (V1)

Response: Comment noted.

D.3 OUTREACH PROCESS/COMMUNITY PARTICIPATION

Comment D-14: The time and the place of the public meeting to discuss the DSOW was inconvenient for working people. (S11)

Response: Comment noted.

Comment D-15: Some people have been prevented from entering the public meeting to discuss the DSOW. (V3)(B7)

Response: Comment noted.

Comment D-16: The members of the Community Board are not democratically elected, they are appointed. So I don't see any point in us doing this any longer and coming to these spaces and talking to these people who do not represent the interests of the Bronx. (F1)

Response: Comment noted.

Comment D-17: The outreach that the Department City Planning did was dismal and at key times wasn't done at all. (C8.19)(B10.1)

Response: Comment noted.

Comment D-18: As a community, we hope the city and the Department of City Planning will listen to us and involve the community more fully in the process. (V1)(B10.1)

Response: As described in Section B of the DSOW, the CEQR process includes public notice and public comment opportunities.

Comment D-19: Homeowners are being neglected in this process. (B3)

Response Comment noted.

Comment D-20: Residents of Jerome Avenue have embarked on a participatory process to articulate their priorities. We're calling for a comprehensive and coordinated approach to documenting, monitoring and overseeing and enforcing all public and private commitments made during the rezoning process. (A4)(L1)(M8)(K2) (W8)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development.

Comment D-21: Many of our longtime residents in this community have expressed a lot of concern about being left out of the process, despite the extensive community engagement. And we must continue to have a dialogue and a process with real engagement with tangible solutions and results. (2)(B7)(T2)(B13)(L3)(C7)(D6)(G7)(S10)(P1)(A3)(D7)(D4)(M5)(C4)(V1)

Response: Refer to D-16

Comment D-21: I see plumbers, I see council members, I see laborers, I see union members, carpenters, I see the people power movement, radical young individuals, young lords. And that's what we need. (Q1)

Response: Comment Noted.

Comment D-22: Throughout the process, it is imperative that community members are continuously engaged and are aware of any new progress with the Jerome Ave Rezoning proposal as it moves through each remaining step in the public approval process. (6)

Response: Comment noted. The required approvals and review procedures including the CEQR process, which includes public notice and public comment opportunities, are described in Section B of the DSOW.

D.4 SENIORS ISSUES/PHYSICAL ACCESSIBILITY

Comment D-23: One key feature of aging in place is the availability of accessible and affordable housing. LiveOn NY recently conducted a survey which found that over 10,000 seniors in the Bronx currently sit on waitlists to secure affordable housing. This extreme need will only be exacerbated by demographic increases, which estimate the population of seniors in NYC to increase to a diverse 1.8 million individuals by 2040. (L3)

Response: Comment noted.

Comment D-24: The ability for a senior to successfully age in place can largely be dependent on their community resources and the thoughtful decision making during planning processes such as the one Jerome Avenue has embarked on. (L3)

Response: Comment noted.

Comment D-25: Affordable housing within one's community helps to prevent social isolation, and better cognitive outcomes. Further, according to HUD aging in place can reduce rates of depression, improves outcomes related to activities of daily living, and protects one's social connections. (L3)

Response: Comment noted.

Comment D-26: All buildings, residential included, must be built for accessibility. Features of this include wide hallways to allow for a wheelchair, staircase alternatives, and handrails to prevent falls, among others. (L3)

Response: This is outside the scope of CEQR.

Comment D-27: HUD has found that 89% of American's over 50 wish to age in place. This statistic, and the aforementioned health benefits, highlight the need for community preference to be utilized when filling affordable units. In a gentrifying city, the improvement that is coming to Jerome Avenue should benefit, at least in part, the individuals who have spent decades building the community's character. (L3)

Response: Comment noted.

Comment D-28: Other components to an age friendly community include accessible transportation, access to nutritious food, availability of wellness programs, and accessibility of health providers. A vision for a well-rounded and age friendly Jerome Avenue, should be a vision that includes the aforementioned tenements and considers the community from a senior perspective. (L3)

Response: Comment noted.

Comment D-29: Are these options accessible to seniors (i.e. no stairs)? (L3)

Response: This is outside the scope of CEQR.

Comment D-30: Are there opportunities for culturally appropriate social engagement such as arts, senior centers, and libraries? (L3)

Response: This is outside the scope of CEQR.

Comment D-31: Do you feel that seniors are welcome in the community? (L3)

Response: The potential impacts to the physical and natural environment, as well as the potential impacts to community services, insofar as they are the subjects of analyses per CEQR will be evaluated as part of the EIS. As described in Section B of the DSOW, the CEQR process includes public notice and public comment opportunities.

Comment D-32: The housing should be available for the increasing senior population, the disabled, veterans, homeless and the mentally ill. (M6)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues

referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-33: The EIS should analyze whether there are opportunities for culturally appropriate social engagement such as arts, senior centers, and libraries available to seniors. (L3)

Response: This is outside the scope of CEQR.

Comment D-34: The EIS should analyze whether there is adequate access to food for seniors. (L3)

Response: This is outside the scope of CEQR.

Comment D-35: The EIS should analyze whether residents feel that seniors are welcome in the community. (L3)

Response: This is outside the scope of CEQR.

D.5 COMMUNITY NEEDS/DESIRES (PLANNING ISSUES)

D.5.1 GENERAL

Comment D-36: The underpasses at certain cross streets need to be kept cleaner, well-lit and safe. (M6)(C9.1)

Response: Comment noted. This is outside the scope of CEQR.

D.5.2 AFFORDABLE HOUSING

Comment D-37: We need quality affordable housing. (M6)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-38: We have a critical need for low income affordable housing, community facilities, traffic and pedestrian friendly areas, and diversification of commercial space that must be analyzed. (1)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-39: Nonprofit developers should be engaged to provide affordable housing. (5)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-40: Why is it when affordable housing is built it is not on a grand scale? You got programs like Citi Bikes, right. Citi Bikes has been around for how long? It only now came into my neighborhood. (B5)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-41: Many affordable housing units are in desperate need of repair, and a lack of options exists allover as the vacancy rate below 4%. (L3)

Response: Comment noted. However, as described in Section I, Task 3, of the DSOW, the potential for indirect residential displacement will be analyzed per the guidance of the *CEQR Technical Manual*.

D.5.3 HOMELESSNESS

Comment D-42: The homeless prevention program should be reinstated to ensure that residents secure permanent housing and to decrease the number of transient individuals and families in our district. (D4)(B10.1)

Response: Comment Noted.

D.5.4 LANDLORD HARASSMENT/DISPLACEMENT

Comment D-43: Landlord harassment is a major problem for renters in the Bronx who live in rent stabilized apartments. To prevent landlord harassment in the wake of this rezoning enforceable anti-harassment measures should be in place, including passage of Intro 214A. (3)(J1)(V5)(A1)(D5)(G6)(2)(O1)(P4)(W3)(G5)(S4)(S5)(K1)(D2)(V4)(C12)(V2)(R6)(M2)(G7)(S10)(M4)(C98.1)(K2)(D3) (7) (M12) (W8)(7)(B10.1)(C9.1)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-44: Landlords do not properly maintain buildings and leave tenants in poor living conditions. (D2)(T4)(R6)(A3)(Q1)(S6)(V2)(M9)(L3)(B10.1)

Response: Comment Noted.

Comment D-45: There is a concern that this plan will result in gentrification and displacement in the way that gentrification and displacement with effects like those in Harlem and Brooklyn. (M6)(B8)(O1)(S11)(M11)(P4)(W3)(J3)(S5)(Y1)(C8)(S7)(H3)(K1)(G4)(L3)(D2)(T4)(C7)(S2)(C11)(C12)(L2)(C2)(W2)(D6)(R6)(M5)(F3)(T5)(M2)(G1)(S13)(G7)(B2)(H1)(S10)(G3)(P1)(S8)(C13)(B9)(J2)(R2)(5)(J1) (R1)(T1)(D4)(G5)(R7)(M10)(B14)(V2)(F1)(G6)(2)(M1)(H2)(D1)(F5)(F2)(E2)(S12)(C5)(C14)(B4)(C8.1)(K2)(6)(V1) (M12) (W8) (M6)(B10.1)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

D.5.5 COMMUNITY SERVICES/EDUCATION/TRAINING

Comment D-46: Community youth need more educational and employment opportunities. (C1)
(G3)(C9.1)

Response: Comment Noted.

Comment D-47: The City should provide funding for programs to ensure that local residents are eligible and prepared for the state certified apprenticeship programs, including GED programs, stipends and childcare. (K2)(C9.1)

Response: Comment noted. This is outside the scope of CEQR.

Comment D-48: We are not receiving the public services that we need. (C11)

Response: Comment Noted.

Comment D-49: The City should provide funding for programs to ensure that local residents are eligible and prepared for the state certified apprenticeship programs, including GED programs, stipends and childcare. (K2)

Response: This is outside the scope of CEQR.

D.5.6 FOOD ACCESS

Comment D-50: Promoting better neighborhood health by creating access to healthy and affordable food options is yet another important step we must take to reduce the rate of chronic illnesses. When considering an economic development plan for the area, we must encourage current and future businesses to invest in the immediate community by making healthy foods a priority. (6)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-51: There is a need for healthy food markets and restaurants. (M6)

Response: Comment noted. This is outside the scope of CEQR.

Comment D-52: We need a grocery store; Whole Foods or Trader Joe's. (T1)

Response: Comment Noted.

D.6 ECONOMIC DEVELOPMENT/FISCAL

D.6.1 GENERAL

Comment D-53: Can the bodega owners invest in one of the projected development lots? (M3)

Response: Comment Noted.

Comment D-54: Vacant lots and zombie properties should be put in a community land trust and land bank, and then apportioned out to experienced nonprofits like Banana Kelly, Cooper Square Community Housing, Catch, and Habitat for Humanity to build true lower income housing. (S13)

Response: Comment Noted.

Comment D-55: Tax money from property taxes should go towards schools, public transportation and public services. (S12)

Response: Comment Noted.

Comment D-56: Homeowners should receive enhancement tax credits when there's new construction. (B3)

Response: Comment Noted.

Comment D-57: The City should create new requirements for developers seeking public subsidies that take into account current Jerome Avenue residents' income levels. (K2)(B10.1)

Response: This is outside the scope of CEQR.

Comment D-58: Good Jobs, Local Hire, Safety and Training: Public funds come with public responsibility. Tax-payer funded subsidies used by developers and contractors to build affordable housing should provide good wages to help the community create more middle class jobs. (K2)(B10.1)

Response: Comment noted.

Comment D-59: The EIS must assess the fiscal impact that the increased asthma rates will have on the City of New York. (T3)

Response: This is outside the scope of CEQR.

D.6.2 LOCAL BUSINESSES CONCERNS

Comment D-60: A business improvement district should be created within the rezoning area. (C1)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-61: These auto repair establishments operate in aging and inadequate facilities on block 2855. (H4)

Response: Comment Noted.

Comment D-62: Every business located in the area of the corridor slated for rezoning must be held to the same standard as the auto-industry is to reach full compliance with city and state licenses, permits and regulations. (E4)(S9)(C9.1)

Response: Comment Noted.

Comment D-63: The City should provide comprehensive strategies and programs to address the needs of the workers and the business owners. These strategies and programs should be accompanied by a written neighborhood study guide. (S3)

Response: This comment address issues outside of Environmental Impact Statement’s Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

D.6.3 JOB CREATION/CONSTRUCTION EMPLOYMENT

Comment D-64: The plan should support local hire, union jobs, and apprenticeship programs, particularly in construction.
(W1)(C12)(W6)(3)(4)(M6)(R1)(M11)(M13)(V4)(G6)(G1)(G3)(S1)(2)(M8)(M5)(C11)(B12)(B4)
(C98.1)(K2)(V1) (M6)(B10.1)(C9.1)

Response: Comment noted.

Comment D-65: As a member of Laborers Local 79, I have a career in helping build this city. I have a good wage with benefits, retirement security and I know when I leave my home in the morning I will work under safe conditions with the proper training and tools needed to do my job. (V1)

Response: Comment noted.

Comment D-66: A career in the unionized building and construction trades is a pathway to the middle class, and it's what our neighborhood desperately needs. (V1)

Response: Comment noted.

Comment D-67: The Draft Scope of Work for the Environmental Impact study does not address the quality of construction jobs being created; whether they are middle-class paying jobs. (W1)

Response: Comment Noted.

Comment D-68: With the current rise in construction fatalities across the city, will the workers tasked in building over 3,000 new apartments be protected from unscrupulous developers who seek high profits through cutting corners? (V1)

Response: This is outside the scope of CEQR.

Comment D-69: Will my family and neighbors have an opportunity, like me, to work on these new buildings and have a career in the unionized building and construction trades? (V1)

Response: This is outside the scope of CEQR.

Comment D-70: It is also my hope that the proposed economic development plan will create long-term employment opportunities for local residents. Such a plan should ensure the creation of living wage paying jobs and seek to support our local minority and women owned small businesses. (6)

Response: This comment address issues outside of Environmental Impact Statement's Scope of Work. However, the Plan will present recommendations and strategies designed to address the issues referenced in the comment, among others. The Plan is focused around: Open Space, Transportation, Housing, Community Resources, Land Use, and Economic Development

Comment D-71: "It is also my hope that the proposed economic development plan will create long-term employment opportunities for local residents. Such a plan should ensure the creation of living wage paying jobs and seek to support our local minority and women owned small businesses." (6)

Response: This is outside the scope of CEQR.

Appendix 10

Written Comments on the Draft Scope of Work

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THE COUNCIL
OF
THE CITY OF NEW YORK

DISTRICT OFFICE
107 E. BURNSIDE AVE
BRONX, NEW YORK 10453
TEL: (347) 590-2874
FAX: (347) 590-2878
CITY HALL OFFICE
250 BROADWAY,
17TH FLOOR
NEW YORK, NY 10007
TEL: (212) 788-7074
FAX: (212) 788-8849

**STATEMENT ON JEROME AVENUE REZONING
SCOPING MEETING – NEW YORK CITY DEPARTMENT OF PLANNING
BRONX COMMUNITY COLLEGE GOULD MEMORIAL LIBRARY AUDITORIUM
2155 UNIVERSITY AVENUE BRONX, NY 10453
Thursday, September 29, 2016 4:00 PM**

- Good afternoon. My name is Fernando Cabrera, New York City Council Member for District 14.
- It is a great pleasure to be here today. Thank you for this opportunity to comment on the Jerome Avenue Rezoning. As Council Member for this district this issue is very important to me. I worked to expand the footprint of the rezoning to its current range and I am here today to listen to all of you throughout the hearing.
- The Jerome Avenue Corridor is a crucial part of my district. The #4 train, NYC Transit buses and retail support the surrounding residential community and generate a tremendous amount of activity, pedestrian and vehicular traffic.
- The proposed rezoning comes at an important time, when we are experiencing a critical need for affordable housing, community facilities, safe, attractive, pedestrian-friendly areas and full utilization and diversification of commercial spaces.
- The *“Draft Scope of Work for an Environmental Impact Study,”* notes that the current land use pattern is nearly 100 years old, when the Jerome Avenue Corridor was developed to accommodate parking for dense residential developments in the area. The Draft Scope of Work further notes that this pattern was basically “frozen” into place by the 1961 zoning.
- Clearly, it is time for a change. Based on the expressed needs of my constituents I support the following land use objectives of the Jerome Avenue Plan:
 - High quality, permanent affordable housing with option for tenants at a wide range of income levels
 - New construction that fits visually and architecturally into the surrounding neighborhood
 - Provision of light and air along the Jerome Avenue Corridor through creation of special rules for new development along the elevated rail line

- Permitting more intensive uses in two nodes to anchor the neighborhood and corridor, such as office space, and entertainment
 - Promotion of active ground floor uses and diverse retail to support community needs and provide consistent streetscape throughout the corridor
-
- One of the most important issues in this rezoning is the employment and local revenue generated by the auto industry. I have had detailed discussions with the leadership and representatives of the local industry and we are looking a number of options to preserve the industry and its jobs including training for business development and expansion.
 - Additionally, the increase in affordable housing will necessitate additional school/classroom space, the amount to be determined by a comprehensive study. New classroom space should be included in the final Scope of Work.
 - Again, thank you for this opportunity. I will continue to work with the community boards, residents, NYC Planning and others to ensure the success of the rezoning.

Respectfully Submitted,

A handwritten signature in black ink, consisting of a stylized 'V' shape followed by a series of loops and a horizontal line extending to the right.

Community Board 5 Section 197-a Plan Phase 1 Summary Report



Prepared by: **EMW Planning & Architecture**
14 Spring Street
Hastings-on-Hudson, New York 10706

June, 2002

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Appendices (Available at CB #5 office)

APPENDIX A: SELECTED FACILITIES AND PROGRAM SITES IN NYC: THE BRONX

APPENDIX B: BRONX CB #5 DEMOGRAPHIC PROFILE

APPENDIX C: ZONING MAPS

**APPENDIX D: SELECTED EXCERPTS FROM THE BRONX: AN ECONOMIC REVIEW BY NYS COMPTROLLER
H. CARL MCCALL; APRIL, 2002.**

APPENDIX E: EXCERPTS FROM RECREATION AND OPEN SPACE IN NYC (PARKLAND / POPULATION RATIOS)

APPENDIX F: EXCERPTS FROM THE BRONX GREENWAY PLAN FOR NYC (THE BRONX GREENWAYS)

APPENDIX G: EXCERPT FROM PLACES FOR PEOPLE

CHAPTER I: SECTION 197-a SCOPE OF WORK

1.Planning Background

Community Board 5, in an ongoing effort to plan and implement its continued revitalization, is seeking corporate and financial partners. By partnering with corporations and financial institutions, there will be opportunities to achieve and expand upon the goals that have already been established in the CB5 2000 Development Plan. This plan, prepared by CB 5 and the Bronx office of the Department of City Planning, articulated the following goals:

- restoring the community's housing stock which had been devastated by years of neglect and abandonment,
- revitalizing the community's business districts, some of which had high vacancy rates and disinvestments,
- improving the existing neighborhood parks in the community,
- increasing the number of local recreational opportunities for youth and the elderly in a district which had long been underserved,
- addressing City investment in local streets and step-streets,
- making specific recommendations relative to the City-held parcels within the district for housing and open space,
- making specific recommendations relative to designating portions of the district as a historic resource,
- recommending development of an esplanade along the Harlem River.

Many of these goals have been met over the past 12 years. The community's housing stock has been supplemented by thousands of new and rehabbed units, new stores are evident along the community's commercial thoroughfares, and vacancy rates have been lowered, neighborhood parks have been improved, and a number of new ones have been constructed, and the City has created a task force specifically aimed at renovating and maintaining step streets.



Galileo Playground



Step Street at Featherbed Lane

In order to build on the successes of the past ten years, Community Board #5 is now preparing a section 197-a Plan. This Plan will update background information on Community District #5 as a setting for analyses and detailed recommendations relative to the community's commercial areas, transportation, open space, recreation, community facilities and other infrastructure, and housing stock.

2. Building on the Present

A number of housing and other projects are moving forward within or immediately adjacent to CB #5 at this time. These include the following, which is currently being constructed:

- Redevelopment of the Caldor's (former Alexander's) site at the intersection of Fordham Road and the Grand Concourse with retail uses on the ground floor, and office and educational use above. Offices and educational facilities of Local 1199, the health workers' union, will be housed here.

Projects for which funding has already been committed include:

- the University Woods environmental education center, for which \$100,000 has already been earmarked by the Borough President's office for design;

- the \$7.2 million rehabilitation of the former Hebrew Institute at Rev. Martin L. King, Jr. Blvd. and Tremont Avenue as a recreation center sponsored by the Kips Bay Boy's and Girl's Club.

The following projects are currently in planning:

- A 1,000-unit rehabilitation of existing housing units in southern portions of the district. Known as University Consolidated, the first phase of this project will involve the rehabilitation of 200 units of housing along University Avenue / Rev. Martin L. King, Jr. Blvd. and Macomb's Road at a total cost of between \$23 and \$26 million. Rehabilitation of these units will be likely to be overseen by the City Department of Housing Preservation and Development, which will allow a portion to be offered for sale as cooperatives, and others rented to households with moderate and middle incomes. The second phase of this project will involve rehabilitation, by the NYC Housing Authority, of 800 existing rental housing units in projects administered by the Housing Authority in this same area. The rehabilitation of currently vacant units will increase the number of households in the district, thereby increasing the level of disposable income available to area businesses.
- A 250,000 retail project bordered by 225th Street, Broadway, the Major Deegan Expressway, and the Harlem River with CB #7 to the north. This mall is expected to include a Target discount variety store.



Based on the experience of other community districts, the Plan is expected to take between one and three years to complete. Funds will be needed for data collection and analyses, commercial streetscape and waterfront studies, organization of interviews and public forums, evaluation of the potential for a light rail facility along Fordham Road to ease congestion, and to provide an attractive connection between Fordham Landing (where waterborne transportation may be considered) and area destinations/ attractions, and the development of other economic development strategies.

Bronx Community Board #5 **Morris Heights / University Heights / South Fordham /Mount Hope**
Section 197-a Plan Phase 1 Report

The Community Board has already committed \$15,000 to begin planning activities, and to establish a foundation for the Plan. The Board views this initial contribution to the effort as a means of leveraging funding sources.

Specific Activities

3. Data Collection and Analysis

As part of the section 197-a Plan effort, information will be gathered on existing physical, geographic, institutional, business and human resources within CB #5. Demographic information relative to CB #5's population and households will be presented, along with information relative to existing employment and poverty rates, and social service utilization. Health statistics will also be presented as appropriate.

To the extent analyses and/or support from the NYC Department of City Planning's central office (i.e., Population, and/or Economic Development divisions), and the Bronx borough office can be provided, these will be utilized. Support will also be solicited at State and Federal levels. To the extent information and/or support can be provided from other City agencies, such as the Department of Aging, or the Bronx Borough President's office, these will be utilized.

Information will be gathered relative to commercial and industrial establishments within CB#5. As appropriate, business establishments outside of the district will also be discussed. Significant sources of employment and activity in the public and not-for-profit sector will be identified.

The overall health and condition of the Community Board's commercial nodes and strips will be analyzed and evaluated. Information will be garnered from interviews with Community Board members and personnel, local business leaders, and a survey of the community's commercial activity areas. Data on sales revenues, commercial vacancy rates, and leasing trends will be gathered.

As a starting point, commercial areas within Community Board #5 will be visited and conditions in each reviewed.

Each of these areas will be surveyed, and information collected on existing retailers. Individual stores in these centers will be identified. In addition to noting the location, type and target niche (quality) of a retailer, the function, if any, of the retailer in the center will be noted, as will other attributes of the commercial area. These features include vacancy and appearance; evidence of recent investment; evidence of disinvestment, deferred maintenance, under-utilization of retail spaces; proximate land uses; constraints on existing commercial activity or growth; proximity of similar retailing opportunities; the nature of the commercial area (i.e., primarily the sale of convenience goods and personal services; or comparison goods, apparel and related, discount merchandise, food and drink / entertainment, etc.); the presence of large department or variety stores, or other anchors; and proximity to transportation options.



Commercial Uses Along Jerome Avenue

Data relative to the pool of existing jobs within CB#5 will be provided including discussion of the types of jobs available, wages / salaries and employment / industry trends. If available, information from the 2002 Census of Business will be included.

4. Community Vision

A Community Visioning process will be facilitated beginning with a targeted questionnaire, and proceeding with follow-up interviews. Public forums will be organized as key topics are identified. Business leaders, elected officials, social service and education providers, City agencies, community leaders and clergy, block and building association leadership, and property owners and residents will be invited to provide input.

This process will seek to involve as much of the community in the planning process as possible. Issues confronting the population in CB #5 will be identified and prioritized. The need for additional community facilities, such as schools, or facilities for the youth population, will be gauged. Vacant sites will be inventoried, and input will be invited as to their use and re-use. The waterfront and the community's commercial districts would be a primary focus of the planning effort. Public input will be crucial to the planning of these areas.

5. Issues Confronting the CB 5 Resident Population

While 2000 Census data relative to income has yet to be released, it is expected that data will show that CB #5 is home to an increasingly Hispanic, low to moderate income population. Issues are expected to include literacy and education, English as a Second language, the availability of unskilled, and semi-

skilled jobs within the district and in its proximity, as well as maintaining access to affordable, quality housing and health care. Other long-standing issues such as the availability of and access to transportation and recreation resources within the district are expected to remain.

skilled jobs within the district and in its proximity, as well as maintaining access to affordable, quality housing and health care. Other long-standing issues such as the availability of and access to transportation and recreation resources within the district are expected to remain.

The 197-a Plan will inventory the existing demographic and socioeconomic attributes of the district's resident population, and will make recommendations as appropriate.

6. Harlem River Waterfront

- a. Conditions along the Harlem River shoreline will be inventoried. This will include land use, and shoreline condition. As applicable, existing hazardous / toxic conditions will be documented based on a review of existing Federal and State agency information.



Harlem Riverfront Looking South Towards River Park Towers

- b. Large tracts will be evaluated for appropriate use.
- c. Specific recommendations will be made relative to Roberto Clemente State Park, River Park Towers, and to implement Community Board #5's existing Harlem River Esplanade recommendations.
- d. Waterborne transportation options will be identified and related to other Plan proposals.
- e. Plans for waterfront sites in the abutting Bronx community district (4, 7 and 8) and Manhattan community district 12 will be identified and related to CB#5 conditions and Plan recommendations.



Vacant Riverfront Site Just South of Fordham Road

- f. The Community Board will work with the Borough President's office in order to facilitate implementation of the Borough President's Regatta Park proposal as soon as possible within the district.

7. Commercial Revitalization and Development

- a. Specific issues confronting each of the District's neighborhood commercial areas (as listed earlier) will be identified.

As identified at this time, these areas will include the following:

- Grand Concourse/ Fordham Road
 - Webster Avenue
 - Jerome Avenue
 - Burnside Avenue
 - Featherbed Lane
 - East 183rd Street
 - Rev. Martin L. King Jr. Blvd./ East 176th Street/ West Tremont Avenue
- b. Commercial vacancies and gaps in community commercial services will be identified.
- c. Commercial organization / structure will be evaluated for each commercial area as appropriate (i.e., merchants' associations, Business Improvement Districts (BIDs), Local Development Corporations (LDCs), etc.). Specific attention will be given to strategies used in neighboring areas, other sections of NYC, and in other urban areas. The resources of the Bronx Overall Economic Development Corporation, the NYC Department of Business

Services, the Mayor's office and the Borough President's office will be reviewed for opportunities appropriate to each commercial area. Each organization / agency will be invited to participate as planning for each area proceeds.



Auto Use on Jerome Avenue

- d. Specific attention will be directed to the Fordham Road commercial area and its existing anchors, pedestrian experience, traffic congestion, parking and loading, appearance, target market and variety of goods and services, etc. Fordham Road continues to be a regional commercial attraction.



Typical Conditions along Fordham Road

The development of a formal commercial organization of businesses along Fordham Road and its tributary commercial strips is already considered an important objective of the Plan.

Revitalization of the Loew's Paradise Theater as a cultural / entertainment center is considered instrumental in increasing nighttime activity in this area, and reintroducing the Fordham Road area as an entertainment destination. As part of the Plan, efforts will be made to engage the owners of the Loew's site and hasten the resolution of matters delaying implementation of the plans for this site, which have already been partially implemented.



Loew's Paradise Theatre: Grand Concourse South of Fordham Road

- e. The potential for a light rail facility connecting the Fordham Landing waterfront to area attractions/ destinations in nearby portions of Manhattan and the Bronx will be evaluated.



University Heights Bridge near Fordham Landing

Attractions in the immediate vicinity in the Bronx include the Bronx Zoo and the Botanic Gardens, Fordham University, Bronx Community College (formerly NYU's uptown campus) with its Hall of Fame, the Belmont neighborhood (restaurants, ethnic foods, festivals, etc.), the Kingsbridge Veteran's Administration Hospital, Poe Cottage, Orchard Beach and City Island. Attractions in nearby parts of Manhattan include the Cloisters, Fort Tryon and Inwood Hill Parks, Yeshiva University, the Dyckman House, and Columbia University's Baker Field.



**Hall of Fame of Great Americans
at Bronx Community College**

The Harlem River waterfront is expected to become a greater attraction over the next several years as water conditions continue to improve and the river once again becomes a major area recreational resource.



Harlem Riverfront, including Roberto Clemente State Park

8. Gateways into the Community

Specific attention will be given to improving the appearance of major gateways into the community, and to economic development at nodes such as the Jerome Avenue exit from the Cross Bronx Expressway (and entrances to the Expressway at other locations). These nodes are critical to first impressions upon arrival to the community.



Fordham at Kingsbridge Road



Rev. MLK, Jr. Blvd. at Tremont

9. Transportation

In addition to specific gateways, the current function and service levels of existing transportation resources in CB #5 will also be addressed. This will include a review and discussion of existing conditions along area roadways, including the Major Deegan Expressway, the Cross Bronx Expressway, Martin L. King, Jr. Blvd. (University Avenue), the Grand Concourse, Fordham Road, as well as other relevant area roadways that will be identified.



Other transportation resources will also be reviewed, including service levels at the Metro-North Hudson Line Commuter railroad station stops (Morris Heights, and University Heights) and the Metro-North Harlem Line Commuter railroad station stops (Fordham Road, Tremont Avenue), as well as conditions and service levels at existing NYCTA subway (B & D lines) and bus routes that serve the district.



10. Community Board Boundaries

The Plan will explore the possibility of extending the CB #5 boundaries to include the entirety of University Heights (i.e., East and West Fordham Road will form the entire northern boundary of the district).

11. Grand Concourse

Historically, the Grand Concourse Corridor has not provided large amounts of retail frontage except near the major retail destinations of 149th street and Fordham Road. In recent years however, retail uses have become more prominent in ground floor locations elsewhere along the Concourse, particularly at locations within Community Board #5.

Commercial conditions along the Grand Concourse will be evaluated with respect to non-conforming/non-complying uses and signage, which have become a problem in recent years in CB #5.



In addition to evaluating conditions in designated commercial districts along the Concourse near Fordham Road (i.e., south of Fordham to 183rd Street), commercial uses along the Grand Concourse will be evaluated in the context of existing supply and demand for retail and ground floor office space in the district, and uses traditionally allowed along the Concourse such as professional offices.

As appropriate, strategies will be considered to eliminate non-conforming / non-complying uses and to return existing commercial spaces to professional office or similar space, or housing; or to eliminate, reduce or regulate the aspects of the commercial uses considered to be most noxious to the character of the Concourse.



**Grand Concourse Looking North
Towards Lewis Morris Apartments**



Pilgrim United Church of Christ

A recent report commissioned by Bronx Borough President's Office to formulate design principles to guide refurbishment of the Grand Concourse. This report draws on boulevard design from around the world, as well as the original intentions of the designers of the Grand Concourse. Design principles outlined in this report will be incorporated into CB #5's section 197a's planning efforts.

12. Environmental Objectives

There are several environmental objectives associated with the proposed planning activities as well. These include determining whether or not existing vacant properties within CB #5 are listed as hazardous waste sites by Federal and State agencies. All vacant properties will also be visited to visually ascertain current conditions on each parcel.

Much of the City's sanitary sewer infrastructure is combined with drainage infrastructure. Thus, during heavy storm events, when flows in the sewers increase several fold, flows are diverted to nearby rivers, in order to reduce the volume of water being sent to sanitary treatment plants. A problem is that sanitary sewage, which is mixed with the drainage, ends up being diverted as well. The sewers designed to allow these overflows to nearby rivers, are called "combined" sewers, and these overflows are called "combined sewer overflows". A second environmental objective to be accomplished as part of the 197-a planning effort is to identify any combined sewer overflows (CSOs) along the Harlem River riverfront, and to identify and/or secure funding to correct these situations.

13. Fair Share

Low and moderate-income communities, and/or communities with relatively little political leverage often become the areas in which unpopular community facilities are sited. Such unpopular facilities include roadways serving regional traffic, alcoholism / substance abuse and mental health facilities, juvenile detention centers, and group homes and other residential facilities for adults and youth.

The 197-a planning effort will gauge the need for such facilities in CB #5 and adjacent community districts, and assess whether or not the number of facilities appears to be higher than will be expected through a fair share formula.

14. Next Steps

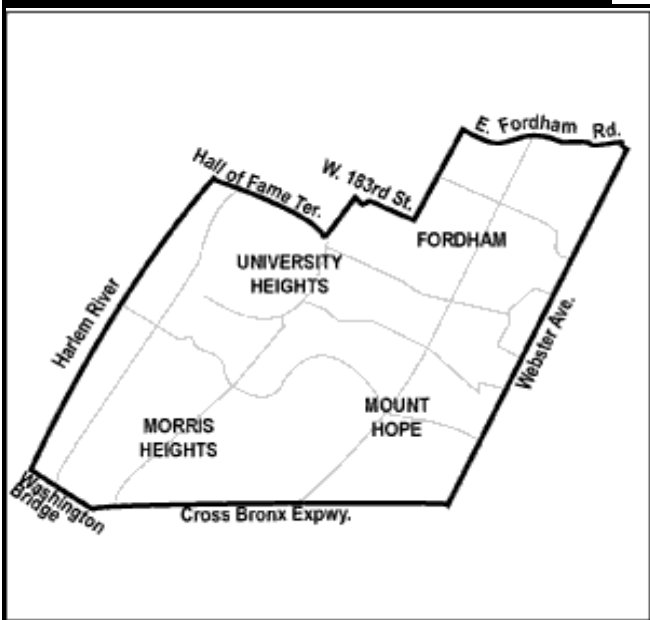
While the 197-a plan will take a comprehensive look at all aspects of the community, it will also define implementation strategies and a roadmap for achieving the community's goals. In concert with a planning consultant, Community Board #5 has developed this first phase of the section 197-a Plan. A detailed schedule for the preparation of the plan is provided in chapter V herein; potential funding sources are discussed in chapter VI.

As we define specific goals and strategies, we look forward to working with financial institutions, corporations and government agencies to establish strategic public/private partnerships in order to maximize our effectiveness and success.

CHAPTER II: SNAPSHOT OF EXISTING CONDITIONS

1. Background

As shown below, the district's boundaries include the Harlem River on the west, Cross Bronx Expressway on the south, Webster Avenue on the east, and Hall of Fame Terrace, West 183rd Street and Fordham Road on the north.



Bronx CB #7 (Norwood, Belmont Park and Kingsbridge) abuts the district to the north, Bronx CB #6 (Belmont, East Tremont and West Farms) abuts the district on the east; Bronx CB #4 (Mount Eden, High Bridge, and the Concourse) abuts the district on the

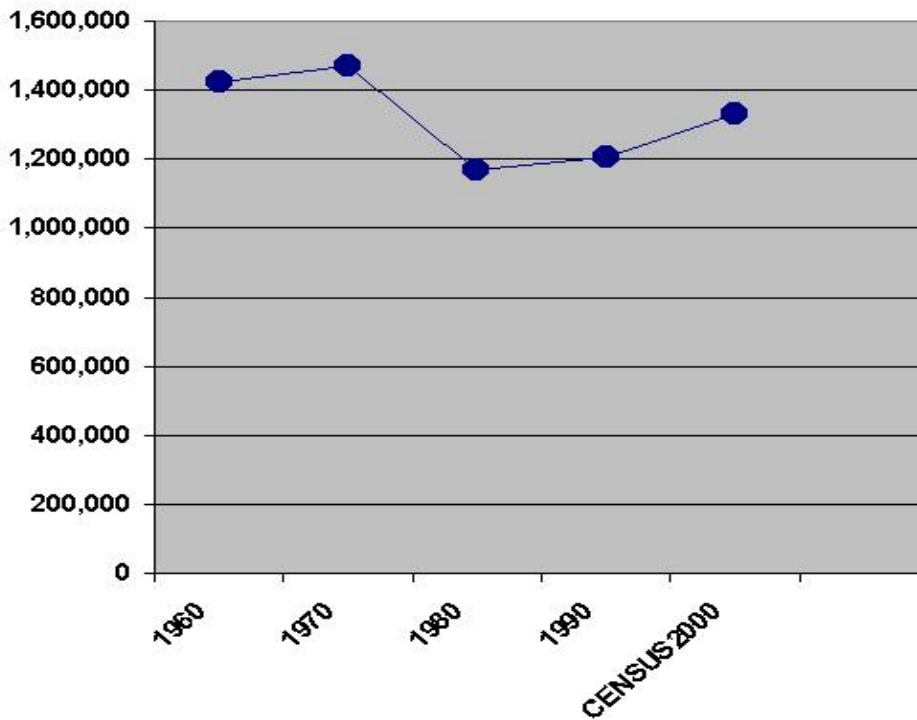
south, and Manhattan CB #12 (Inwood, Washington Heights) lies opposite the district on the west side of the Harlem River.

2. Socioeconomic Background

Bronx County Population Change

After a steep drop in population between 1970 and 1980, the population of the Bronx has rebounded over the past 20 years, although overall population levels are still approximately 100,000 below the 1970 peak, as shown in the graph below.

BRONX POPULATION CHANGE 1960-2000



Source: Discovering the Bronx. Lehman College of the City University of New York

Population in the Bronx is projected to continue to increase over the next 10 to 20 years, as additional housing projects are contemplated, and additional apartments in the borough are rehabilitated.

Community Board #5 Population Change

As shown in Table 1 below, between 1980 and 2000, Bronx Community Board #5's population mirrored that of the Bronx as a whole.

Table 1: Bronx Community Board #5: Population Growth			
POPULATION	1980	1990	2000
Total Number	107,997	118,435	128,313
Percent Change	--	9.7	8.3
Source: NYC Department of City Planning			

The population of Community Board 5 (CB #5) as a whole has increased over the past 20 years. In 1980, population in the district, after several years of abandonment and disinvestment, had reached a low of 107,997, as compared to 121,807 in 1970. Between 1980 and 2000, Community Board 5's population increased by 18.8 percent to 128,313, and now represents approximately 9.7 percent of Bronx County's total population.

The population in the neighboring community boards (CB 7, 6 and 4 in the Bronx, and 12 in Mnahattan) also increased significantly during the 1980-2000 period.

As in the Bronx as a whole, population in the district is projected to increase over the next 10 to 20 years, as some additional housing projects are contemplated, and additional apartments are rehabilitated.








Changes in Racial Composition 1990 to 2000

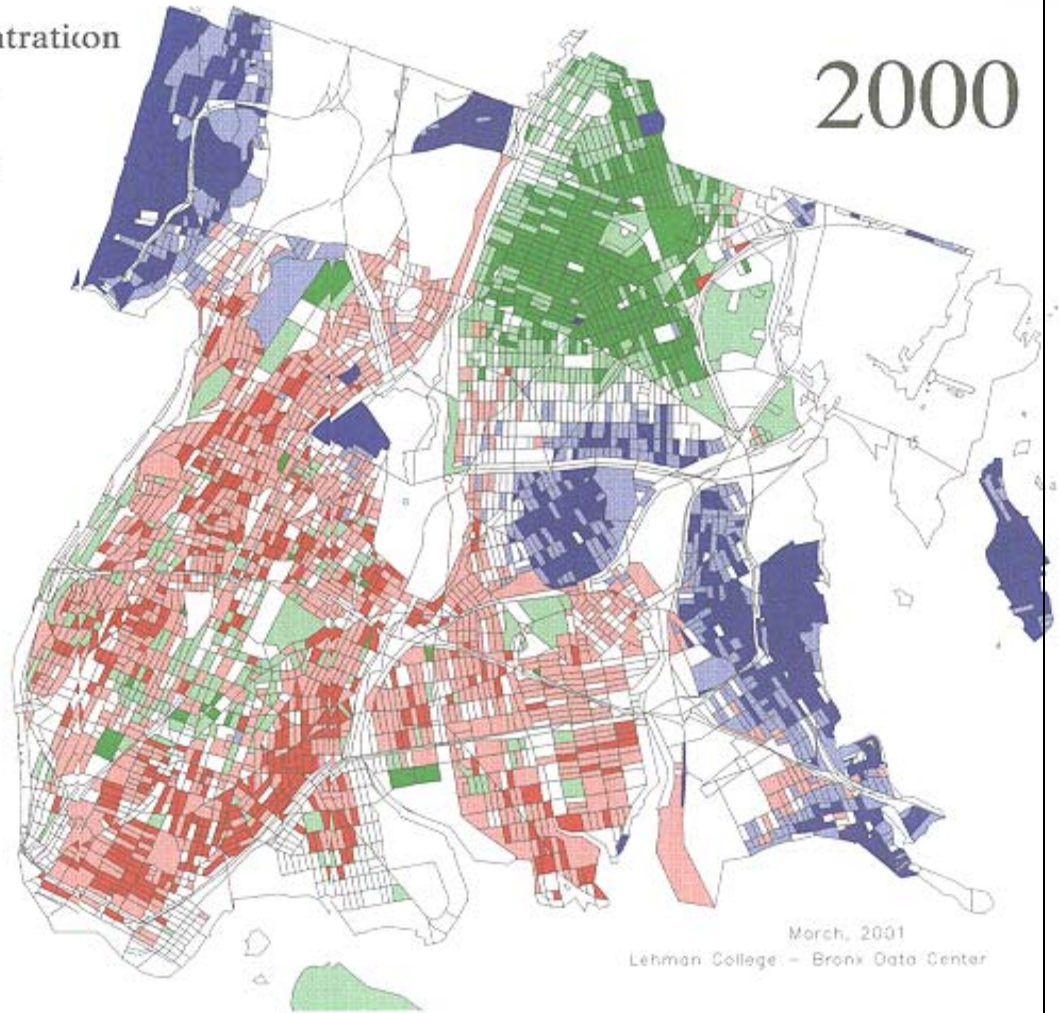
The following maps showing the racial and ethnic concentrations of Bronx blocks in 1990 and 2000 were prepared by Lehman College's Bronx Data Center. The most significant changes with regard to Bronx CB #5 is the increase in the number of blocks where Hispanics comprised 75 percent or more of the population.

Racial-Ethnic Concentration Bronx Blocks

2000

Blocks with Population
of 10 or More

-  N.H. Whites 75% +
-  N.H. Whites 50-75%
-  N.H. Blacks 75% +
-  N.H. Blacks 50-75%
-  Hispanics 75% +
-  Hispanics 50-75%
-  No Absolute Majority



Source: US Census

March, 2001
Lehman College - Bronx Data Center

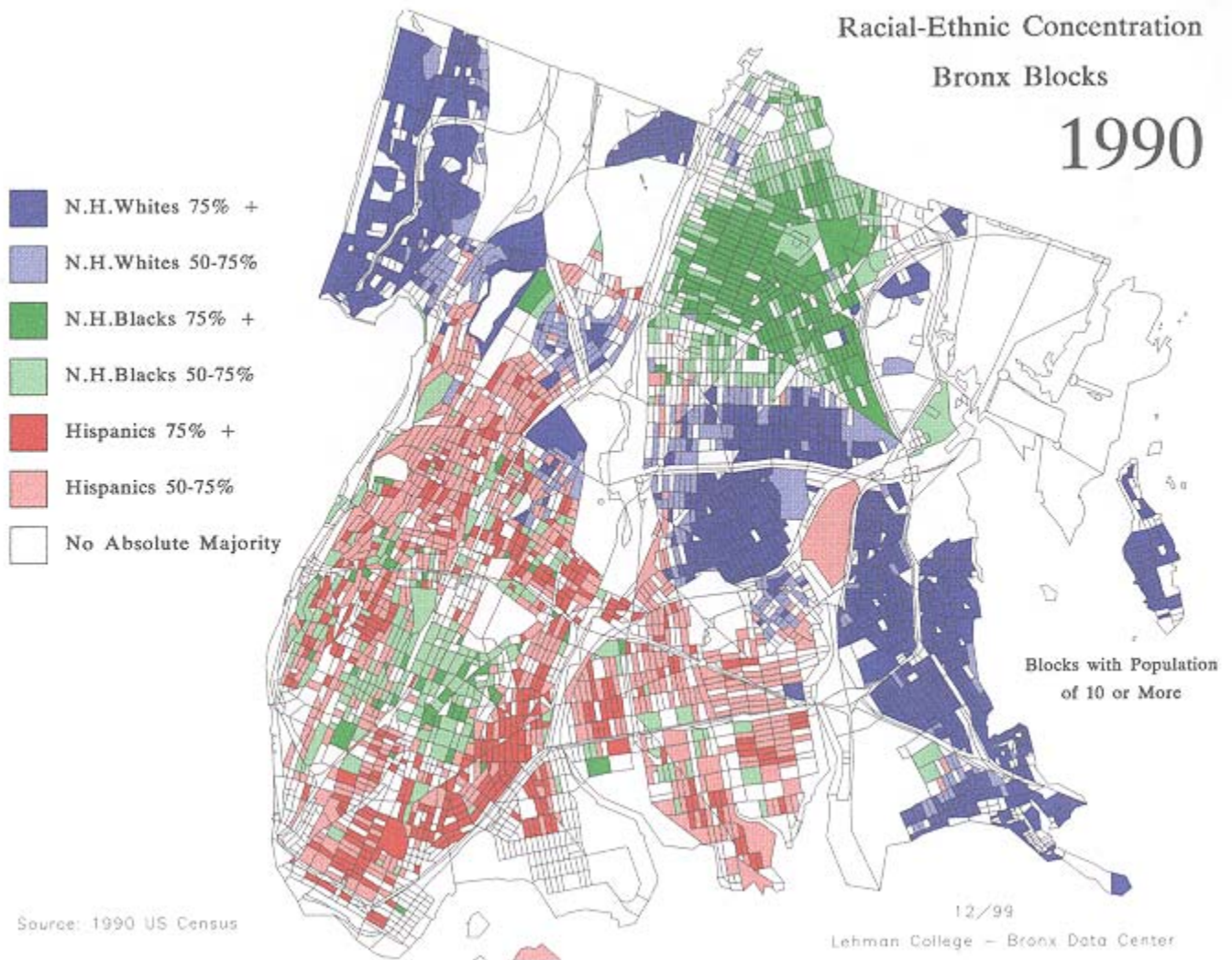


Table 2 on the following page provides the numerical and percent change between 1990 and 2000 for total population, racial and ethnic populations, population under 18 and over 18, and the total number of housing units within Bronx Community District #5 in 1990 and 2000.

As shown in Table 2, the population in Bronx CB #5 increased by just under 10,000 persons between 1990 and 2000. The entire increase and more was composed of increases in the Hispanic population residing in CB #5. The Hispanic population in CB #5 increased by 11,736 persons between 1990 and 2000, increasing from 56.8 percent of the total population to 61.6 percent of the total. The majority of the remaining 38.4 percent are Black/African American Nonhispanic. While decreasing slightly between 1990 and 2000, this group continues to represent just under one third of CB #5's population.

Table 2: Total Population by Mutually Exclusive Race and Hispanic Origin and Total Housing Units						
Bronx Community District #5, 1990 and 2000						
	1990		2000		Change	
1990-2000						
Bronx Community District 5	Number	Percent	Number	Percent	Number	Percent
Total Population	118,435	100	128,313	100	9,878	8.3
Nonhispanic of Single Race:	-	-	-	-	-	-
White Nonhispanic	2,500	2.1	1,917	1.5	-583	-23.3
Black/African American Nonhispanic	45,379	38.3	41,609	32.4	-3,770	-8.3
Asian or Pacific Islander Nonhispanic	2,172	1.8	2,071	1.6	-101	-4.7
American Indian and Alaska Native Nonhispanic	444	0.4	453	0.4	9	2
Some Other Race Nonhispanic	628	0.5	978	0.8	350	55.7
Nonhispanic of Two or More Races	-	-	2,237	1.7	-	-
Hispanic Origin	67,312	56.8	79,048	61.6	11,736	17.4
Population Under 18 Years	42,380	100	45,912	100	3,532	8.3
Nonhispanic of Single Race:	-	-	-	-	-	-
White Nonhispanic	560	1.3	637	1.4	77	13.8
Black/African American Nonhispanic	15,633	36.9	14,254	31	-1,379	-8.8
Asian or Pacific Islander Nonhispanic	589	1.4	561	1.2	-28	-4.8
American Indian and Alaska Native Nonhispanic	170	0.4	243	0.5	73	42.9
Some Other Race Nonhispanic	320	0.8	363	0.8	43	13.4
Nonhispanic of Two or More Races	-	-	665	1.4	-	-
Hispanic Origin	25,108	59.2	29,189	63.6	4,081	16.3
Population 18 Years and Over	76,055	100	82,401	100	6,346	8.3
Nonhispanic of Single Race:	-	-	-	-	-	-
White Nonhispanic	1,940	2.6	1,280	1.6	-660	-34
Black/African American Nonhispanic	29,746	39.1	27,355	33.2	-2,391	-8
Asian or Pacific Islander Nonhispanic	1,583	2.1	1,510	1.8	-73	-4.6
American Indian and Alaska Native Nonhispanic	274	0.4	210	0.3	-64	-23.4
Some Other Race Nonhispanic	308	0.4	615	0.7	307	99.7
Nonhispanic of Two or More Races	-	-	1,572	1.9	-	-
Hispanic Origin	42,204	55.5	49,859	60.5	7,655	18.1
Total Population	118,435	100	128,313	100	9,878	8.3
Under 18 Years	42,380	35.8	45,912	35.8	3,532	8.3
18 Years and Over	76,055	64.2	82,401	64.2	6,346	8.3
Total Housing Units	39,082	-	42,691	-	3,609	9.2

Source: US Census Bureau

A Demographic Profile of Bronx CB #5 from the 2000 Census is provided in Appendix B.

Post Enumeration Adjustments

It is important to remember that communities such as Bronx CB #5 have been notoriously undercounted during recent Census enumerations.

As noted in the report Discovering the Bronx prepared by Lehman College of the City University of New York, "after the official 1990 census results were in place, a Post Enumeration Survey was conducted to include people missed in the original count. In the Bronx, an additional 62,000 people were 'found,' a gain of over five percent. Adjusted figures showed an undercount of over six percent for Blacks and Hispanics, while the non-Hispanic White population was actually overcounted." It was determined during the 1990 Post Enumeration Survey that areas within Bronx CB #5 were undercounted by between five and 8.65 percent.

While Census coverage was expected to improve during the 2000 Census, it is still likely that some of the Bronx CB #5 population was missed. As additional data is released, it will become clear whether an undercount was likely.

Vital Statistics

During the 1990s, the absolute number of births along with the birth rate, and the number of deaths and death rate declined substantially in Community Board #5. Perhaps most striking, as seen in Table 3 below, is the 72 percent drop in the infant mortality rate. Total infant deaths in 1999 were less than half the number in 1990, even with an increase in the district population.

Table 3: Bronx Community Board #5, Bronx & NYC: Vital Statistics Comparison						
	Bx CB #5		Bronx		NYC	
VITAL STATISTICS	1990	1999	1990	1999	1990	1999
Births (Number)	3,650	2,658	26,281	21,396	129,807	113,980
Births (Per 1,000)	30.8	22.4	21.8	17.8	17.7	15.6
Deaths (Number)	766	583	11,983	9,947	68,439	58,241
Deaths (Per 1,000)	6.5	4.9	10.0	8.3	9.4	8.0
Infant Mortality (Number)	47	20	351	142	1,496	756
Infant Mortality (Per 1,000)	12.9	7.5	13.4	6.6	11.5	6.6
Source: NYC Department of Health						

Public Assistance

As shown in Table 4 on the following page, levels of public assistance to households within Bronx CB #5 generally declined between 1994 and 2000. A substantial increase was recorded in Medicaid recipients, with a less substantial increase recorded in Supplemental Security Income recipients. However, sharp declines were recorded for those receiving public assistance such as Aid to Families with Dependent Children, and Home Relief. Overall, the percentage of

the population receiving public assistance within Bronx CB #5 declined by 25 percent between 1994 and 2000.

Table 4: Bronx Community District #5		
INCOME SUPPORT	1994	2000
Public Assistance (AFDC, Home Relief)	49,917	27,750
Supplemental Security Income	8,000	9,587
Medicaid Only	8,190	16,232
Total Persons Assisted	66,107	53,569
Percent of Population Assisted	55.8	41.8
Source: NYC Human Resources Administration		

3. Land Use and Zoning

Existing land use conditions within Bronx CB #5, as compiled by the NYC Department of Finance and NYC Department of City Planning in 1999, are shown on the following page.

Table 5: Community Board #5 Land Use Distribution		
Land Use	# of Lots	% of Total Lots
1-2 Family Residential	1,199	13
Multi-family Residential	1,050	35
Mixed Residential & Commercial	245	10
Commercial & Office	220	8
Industrial & Manufacturing	22	2
Transportation & Utility	31	1
Public Facility & Institutional	131	16
Open Space & Outdoor Recreation	54	4
Parking Facilities	184	4
Vacant Land	191	5
Total	3,327	100
Note: Total percentage of lot areas may exceed the sum of individual land use categories since lots classified as "other/miscellaneous", such as land under water, are included in the totals but excluded from the categories.		
Source: NYC/DCP & NYC Department of Finance		

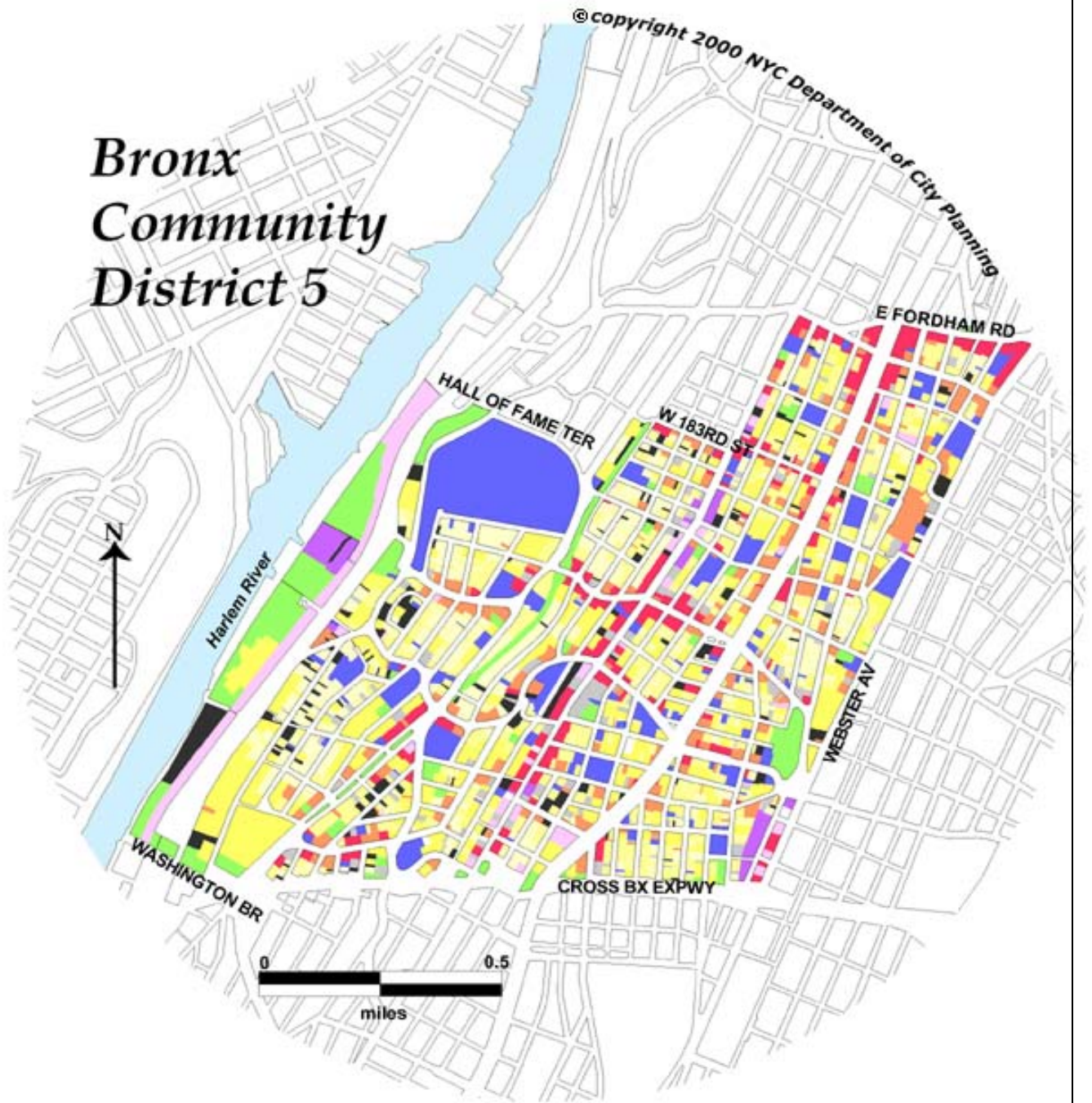
Zoning

Zoning maps for Bronx Community Board #5 are provided in Appendix C.

The following excerpt from the CB5 2000 Development Plan remains valid today:

The area with the lowest density is along the western ridge of the district – just before the steep drop-off to the Harlem River – known as Morris / University Heights. Here the zoning ranges from R5 (typically 2 and 3-family row houses and small apartment buildings) to R7-1 (typically medium-density apartment houses common in many sections of the Bronx.) The Jerome Avenue valley, the Grand Concourse ridge, and the western side of the Webster Avenue valley are relatively homogeneous in residential character and density. Here the zoning is R7-1 and R8 (exemplified in the type of development found along the Grand Concourse.) These areas are known as South Fordham in the northern section of the district, and Mount Hope in the southeast."

Table 5 provides a distribution of land use within Bronx CB #5 by number of lots.



Residential Land Uses

- 1 & 2 Family Residential
- Multi-Family Walkup
- Multi-Family Elevator
- Mixed Residential & Commercial

Non-Residential Land Uses

- Commercial & Office
- Industrial & Manufacturing
- Transportation & Utility
- Public Facilities & Institutions
- Open Space & Outdoor Recreation
- Parking Facilities
- Vacant Land
- All Others or No Data

Base Map: COGIS Tax Lot File Release 96B, clipped to shoreline
 Land Use: NYC Department of Finance's Real Property File (July 1999) modified by the Department of City Planning for display of condominiums and parks in appropriate land use category.

4. Transportation

Bronx Community Board #5 is easily accessed from the regional roadway network via the West 179th Street (northbound), and Fordham Road exits of the Major Deegan Expressway, which travels north and south along the community's western boundary. The Board is also easily accessed from the Cross Bronx Expressway via the Webster Avenue, and Jerome Avenue, exits. From Manhattan, the Board is accessed via the Washington Bridge which crosses from Martin L. King, Jr. Blvd. (University Avenue) to West 181st Street in Manhattan.

Major north-south roadways traversing the district include Martin L. King Jr. Blvd (University Avenue), Jerome Avenue, the Grand Concourse, and Webster Avenue. Major east-west roadways include Tremont Avenue, Burnside Avenue, and Fordham Road.

The Hudson division of the Metro North commuter train line, and accompanying Amtrak regional rail lines are located along the district's western boundary adjacent to the Harlem River. The Harlem division of the Metro North commuter train lie just east of the district's eastern boundary. This is particularly important as commutation to employment centers in Westchester County has become more important in recent years. Fordham Plaza, adjacent to CB #5's northeastern corner, has become a major hub of commutation activity.

The district is served by the IND B and D lines which travels beneath the Grand Concourse and have stops at 174th – 175th Streets, Tremont Avenue, 182nd – 183rd Streets and Fordham Road. The district is also served by the IRT #4 line which travels above Jerome Avenue and has stops at 176th Street, Burnside Avenue, 183rd Street and Fordham Road.

The district is served by the following bus routes, all operated by the NYC Transit Authority:

▪ #3 University Avenue (MLK, JR. Blvd.)	▪ #41 Webster Avenue
▪ #32 Jerome, Morris Avenues	▪ #40 Burnside Avenue
▪ #1 Grand Concourse	▪ #42 Burnside Avenue
▪ #2 Grand Concourse	▪ #18 Macombs Road, Sedgwick Avenue, Undercliff Avenue
▪ #12 Fordham Road	▪ #36 Tremont Avenue

5. Recreation and Open Space

Over the past 15 years, a number of pocket parks have been constructed, and a number of playgrounds have been renovated in Bronx Community District #5. Roberto Clemente State Park's 25 acres along the Harlem River are also a relatively recent addition to the community's recreation and open resources. Nevertheless, Bronx Community District #5 continues to have fewer than one acre of recreation / open space per 1,000 residents.

The NYC Department of City Planning prepared a report entitled Recreation and Open Space in New York City: The Bronx, in the Spring of 1995. In the report, population to parkland ratios are computed for each community district in relation to parkland administered by the NYC Department of Parks and Recreation. Based on this report, Bronx CB #5 had 0.19 acres of parkland per 1,000 residents. It should be noted that this report relied on the district's 1990 population; with an increase of approximately 10,000 residents through 2000, and little new parkland added to the inventory, the ratio has only become lower.

Recreation and open space resources are listed in Appendix A: Selected Facilities & Program Sites in New York City: The Bronx (1999 edition). Appendix E provides a graphic depiction of the parkland to population ratio within CB #5 and other Bronx community boards. Appendix E also provides specific information relative to the amount of parkland within CB #5 and the other Bronx community boards.

An excerpt from the City's Greenway Plan is included in Appendix F. Three greenways are planned within CB #5, including the Harlem River Trail (a portion of which is currently usable), the Aqueduct / University Greenway, and the Grand Concourse Greenway. Water crossings are also located within the district at Washington Bridge, and in proximity to the district at University Heights, and High Bridge.

Finally, an excerpt is provided in Appendix G from Places for People, a 1976 publication in which River Park Towers, and Roberto Clemente State Park were highlighted as examples. Text and illustrations included in this publication depict the original intent for the Harlem riverfront within Bronx CB #5, as envisioned in the mid 1970s.

6. Social Services

The following social services are also listed in Appendix A: Selected Facilities & Program Sites in New York City: The Bronx (1999 edition):

1. Schools, including public and private elementary and secondary schools, colleges, universities and institutions granting post-secondary degrees.
2. Recreational and Cultural Facilities, including facilities administered by the NYC Department of Parks and Recreation, federal monuments and

parklands administered by the National Park Service, state parks managed by the NYS Office of Parks, Recreation and Historic Preservation, conservation areas administered by the NYS Department of Environmental Conservation, the branch libraries of the New York Public Library and related systems, and cultural institutions receiving City support via the Department of Cultural Affairs.

3. Public Safety and Criminal Justice Facilities, including FDNY facilities, ambulance stations, training facilities, NYPD facilities, NYC Housing Authority police service areas; city, state and federal correction facilities, including juvenile detention facilities and group homes; and state and federal court buildings.
4. Health Facilities, including public and private hospitals, nursing homes, and ambulatory general health care services.
5. Alcoholism and Substance Abuse Facilities
6. Mental Health Facilities and Programs
7. Mental Retardation and Development Disabilities Facilities and Programs
8. Residential and Day Care Facilities for Children
9. Residential Facilities and Day programs for Adults and Families
10. Facilities for Seniors

CHAPTER III: NEEDS ASSESSMENT

A questionnaire has been developed to assist in performing a needs assessment. The questionnaire would be targeted at a specific population in CB #5 involved with the day to day administration of educational, social service and community agencies, church and religious organizations, Community Board members and staff, and others.

The questionnaire is provided on the following pages. The questionnaire has been designed to utilize a ranking system. Results may then be tabulated and analyzed by statistical means.

Community Visioning Questionnaire

Thank you for your time. The following will be used to develop a list of critical issues, and to develop a series of specific recommendations.

1. What do you view as the most pressing issue facing Community Board 5 today? Please rank the top 4, with 1 being the most important.

- | | | | |
|---------------------------------|-----|-----------------------------|-----|
| Housing quality | ___ | Lack of youth services | ___ |
| Crime | ___ | Education | ___ |
| Drug abuse | ___ | Lack of senior services | ___ |
| Availability of social services | ___ | Housing affordability | ___ |
| Commercial revitalization | ___ | Jobs / Economic development | ___ |
| Availability of health services | ___ | Lack of parks / Open space | ___ |
| Pollution / Rodents | ___ | Park maintenance | ___ |

Other: _____

2. 2000 Census data show the district to have 128,313 inhabitants as compared to 118,435 in 1990, and 107,997 in 1980. In your view, has the introduction of new inhabitants contributed to or adversely affected any of the following?

- | | | | |
|--|-----|---|-----|
| Youth services | ___ | Class size / overcrowding at district schools | ___ |
| Crime rate | ___ | Lack of on-street parking | ___ |
| Senior services | ___ | Overcrowded housing | ___ |
| Quality and/or availability of social services | ___ | Housing affordability | ___ |
| Quality and/or availability of health services | ___ | Adequacy of parks / open space | ___ |
| Overcrowded transportation systems | ___ | Availability of day care | ___ |

Other: _____

3. During the last two Censuses, the City has argued that Latino and black areas of the City, such as CB #5, have been undercounted. Based on your experience, has there been an undercount of CB #5 neighborhoods as part of the 2000 Census?

Yes No

4. For each of the following transit services, please indicate whether service levels are adequate or need improvement. Below each you may elaborate.

IRT #4 elevated / subway line Adequate Needs improvement

IND B, D subway line Adequate Needs improvement

NYCTA bus lines

#3: University Avenue (MLK, JR. Blvd.) Adequate Needs improvement

#41: Webster Avenue Adequate Needs improvement

#32: Jerome, Morris Avenues Adequate Needs improvement

#40: Burnside Avenue Adequate Needs improvement

#1: Grand Concourse Adequate Needs improvement

#42: Burnside Avenue Adequate Needs improvement

#2: Grand Concourse Adequate Needs improvement

#18: Macombs Road, Sedgwick Avenue, Undercliff Avenue
Adequate Needs improvement

#12 Fordham Road Adequate Needs improvement

#36 Tremont Avenue Adequate Needs improvement

5. Given the increasing levels of vehicle ownership and usage in the Bronx parking may often be difficult to find, particularly in commercial areas. Please indicate below the commercial areas in which you feel parking is inadequate?

Grand Concourse/ Fordham Road

Webster Avenue

Jerome Avenue

Burnside Avenue

Featherbed Lane

East 183rd Street

Rev. Martin L. King Jr. Blvd./ East 176th Street/ West Tremont Avenue

Other: _____

For questions 6 through 12, except where a Yes or No answer is requested, please rate each choice according to the following scale:

- 1 = Very Important
- 2 = Important
- 3 = Somewhat Important
- 4 = Not Important

You may also provide your own choice, and rate it as indicated in each question.

6. Economic development is one of the issues highlighted in the most current Community District Needs Statement (Fiscal Years 2002/2003). This theme has been articulated for many years in CB 5's Needs Statements. How do you believe this issue can best be addressed?

- Investment in adult occupational education / training _____
- More formal links with area industrial enterprises such as Bathgate Industrial Park, Port Morris and Hunt's Point Economic Development Zones _____
- Investment in literacy / ESL _____
- Availability of GED classes _____
- Facilitate financing of expanded / start-up businesses _____
- Other: _____

7. Commercial revitalization is another issue highlighted in the most current Community District Needs Statement (Fiscal Years 2002/2003). This theme also has been articulated for years in CB 5's Needs Statements. How do you believe this issue can best be addressed?

- Assemble sites and attract new commercial investment _____
- Seek funding / lobby City to make improvements to commercial districts _____
- Make portions of existing strips into part-time / full-time pedestrian malls _____
- Organize commercial areas / merchant's associations _____
- Organize commercial areas / Business Improvement Districts _____
- Develop and fund specific commercial facade program _____
- Reduce /eliminate retail commercial uses on Grand Concourse _____
- Institute community patrolling along community commercial streets _____
- Facilitate financing of expanded / start-up businesses _____
- Other: _____

8. *It is increasingly being recognized that open space and recreation areas are vital to an individual's development, community's health and desirability as a place to live. During its last review of district conditions, Community Board 5 determined that it was difficult, particularly in its western neighborhoods, for people to get to area recreational resources. It was also evident at that time that recreational areas were too few and in need of investment. As of 1995, Bronx CB #5 continued to have a mere 0.19 acres of parkland for each 1,000 residents, among the lowest of all of the City's community districts. What, in your view, continues to be needed?*

Greater accessibility to community parks _____

Additional pocket parks _____

Additional recreation centers _____

Waterfront recreation _____

Recreation in concert with schools
(i.e., after-school programs) _____

Other: _____

9. *Approximately five percent of the District's land area is currently vacant. Much of the land is in the form of small and medium sized lots distributed throughout the district. In the past, the Community Board has recommended that these areas be assigned to recreational / cultural uses. Since the mid 1980's, a number of new recreational resources have been added to the district's inventory. At this time, how do you believe that the these vacant lands would be best used?*

In-fill housing / multiple-family _____

In-fill housing / single or two-family _____

Natural space _____

Community gardens _____

Passive recreation space (i.e., benches,
areas for small children, chess boards) _____

Active recreation space (i.e., playgrounds, ball courts
playing fields, tennis courts, roller blading areas etc.) _____

Other: _____

10. Roberto Clemente State Park is located along the Harlem River in the district's westernmost section. The Major Deegan Expressway is a significant obstruction as there are a limited number of crossings. Other than River Park Towers, the State Park is the only destination on the west side of the Expressway. In your view, is the Roberto Clemente State Park an underutilized resource?

Yes No

How can Roberto Clemente Park better serve the CB #5 communities?

- Better maintenance _____
- Increased programmed activities _____
- Additional water-related activities _____
- Better physical accessibility to area _____
- More facilities (i.e., picnicking, benches, ball courts) _____
- Better notification of programs / activities _____
- Improved safety _____
- Other: _____

11. The Roberto Clemente State Park is mapped along much of the district's Harlem River waterfront. According to the most current land use map prepared by the NYC Department of City Planning, the waterfront is also home to River Park Towers, a large industrial use, and a large piece of vacant land. How do you believe the waterfront can best be integrated into the future CB 5 community?

- Housing _____
- Natural space _____
- Transportation Link _____
- Passive recreation space (i.e., benches, areas for small children, chess boards) _____
- Active recreation space (i.e., playgrounds, ball courts playing fields, tennis courts, roller blading areas etc.) _____
- Mixed use _____
- Other: _____

12. The total size of the district's population under 18 increased between 1990 and 2000. How important are the following specific services to the district's youth population?

- Drug abuse prevention _____
- Sex education / planned parenthood _____
- Child rearing skills _____
- English as a Second Language _____
- Occupational education _____
- Job skills _____
- Other: _____

13. Please take an opportunity to list any personal comments below. For example, should you feel an important community service is lacking in the district, please list it here. Should you feel some subject was overlooked in this questionnaire, you may also list that here.

CHAPTER IV: BIBLIOGRAPHY

1. Discovering the Bronx. Lehman College of the City University of New York.

Comparison of Bronx demographics based on 1990 and 2000 Census data.

2. The Bronx: An Economic Review, April 2002. H. Carl McCall, State Comptroller.

New York State Comptroller H. Carl McCall prepared this report in early 2002. The report includes a host of statistical data on the Bronx in various economic-related topics. Comparisons are made with New York City's other four boroughs. This compilation of information was intended to give a clear picture of the economic status within the Bronx.

3. Harlem River Boathouse; New York Restoration Project: New York, New York. Robert A.M. Stern Architects.

Proposal for a boathouse on the Manhattan side of the Harlem River just south of Sherman's Creek (i.e., opposite Bronx CB #5) prepared in February, 1999.

4. 1999 Annual Report on Social Indicators; A compendium of statistical data that describe the economic, social, physical and environmental health of the city. NYC Department of City Planning.

This report gauges the economic, social, physical and environmental health of the City of New York. The data collected covers the period from 1994-1998, providing a fairly current evaluation of the city.

5. Selected Facilities & Program Sites in New York City, 1999 Edition, The Bronx. City of New York/ Department of City Planning.

Listed in this report are selected facilities within the twelve community districts of the Bronx which are either operated, funded, licensed or certified by a government agency.

6. Recreation and Open Space in New York City, The Bronx. New York City Department of City Planning- Spring, 1995.

The Department of City Planning prepared this quick reference highlighting existing recreational or open space within the Bronx. Location maps, identifying information and descriptions are provided for the various facilities.

7. Planning for Common Ground; How to Create a Neighborhood 197-a Plan. The Municipal Art Society of New York, Planning Center.

Rules for the Processing of Plans Pursuant to Charter Section 197-a. City Planning Commission, City of New York.

197-a Plan Technical Guide. NYC Department of City Planning.

These documents provide background and guidance for the 197-a planning process.

8. Citywide Statement of Needs; For City Facilities/ Fiscal Years 2003 and 2004. The Department of City Planning and The Department of Citywide Administrative Services.

2001 Atlas of City Property / The Bronx Community Districts 1 to 12. Department of City Planning & Department of Citywide Administrative Services.

Latest in a series of reports required under Section 204 of the NYC Charter. Along with Criteria for the Location of City Facilities (the Fair Share Criteria), the Statement of Needs is part of a planning process in which communities are informed at the earliest possible stage of the city's needs for facilities and the specific criteria for selecting the locations of those facilities.

The Gazetteer of City Property (2001 Atlas of City Property), published in conjunction with the Citywide Statement of Needs, supplies information about the use and location of existing city-owned and leased properties.

As necessary, these reports and maps should be supplemented annually.

9. Coastal Zone Boundary of New York City. Department of City Planning/New York City.

New York City Comprehensive Waterfront Plan; Reclaiming the City's Edge. Department of City Planning, City of New York.

Plan for The Bronx Waterfront; New York City Comprehensive Waterfront Plan. Department of City Planning, City of New York.

The Bronx Harlem River Plan. NYC Department of City Planning.

The Coastal Zone Boundary report includes a series of maps outlining New York's coastal zone boundary.

These publications outline the past, and present conditions along New York City's extensive waterfront.

The Comprehensive Waterfront Plan provides a recommended blueprint for future development along the entire City's waterfront, while the second report

provides an overall description and plan for the Bronx waterfront, and the third publication concentrates specifically on the Bronx's Harlem River waterfront.

10. CB5 2000 Development Plan. Community District 5 (Bronx).

This document was prepared in the early 1990's and includes recommendations in the following four critical areas: housing, commercial & economic development, open space & recreation facilities, and community facilities.

11. Community District Needs; The Bronx, Fiscal Years 2002/2003. Department of City Planning, City of New York.

Publication summarizing pertinent geographic and population data for all Bronx community districts, along with each district's Statement of Needs for Fiscal Years 2002/2003.

12. Waterfronts Alive; Tips for New York from Revitalized Shorelines Across North America. Department of City Planning/ New York City.

This report suggests that we are at a very exciting turning point in our waterfront development. History has shown us how vital waterfronts have been to the development of civilization. This report outlines trends observed in the revitalization of other communities which may be applicable to the New York experience.

13. Partnership for the Future; A 197-a Plan for the Revitalization of Bronx Community District #3. Community Board 3/ Borough of the Bronx, New York City.

Originally presented by Bronx Community Board 3 in 1989, the Partnership of the Future was the city's first adopted community board 197-a plan.

14. The Future of Transportation in the Region: Mobility for the Millennium, New York Metropolitan Transportation Council.

Detailed transportation recommendations for each segment of the region, and for specific long-term regional transportation goals are provided in this report prepared by this regional planning agency in the late 1990s.

15. The Grand Concourse Vision Project. The Sam Schwartz Company.

This report provides a historical background of the Grand Concourse, one of New York City's most significant boulevard, and the spine of activity in Bronx CB 5. Specific recommendations are offered which attempt to balance the need for a regional vehicular thoroughfare, with the residential, commercial, institutional and recreational activities which line it.

CHAPTER V: POTENTIAL BUDGET

Task	Budget (Range)
Data Collection / Existing Businesses: Proprietary Services	\$5,000 to \$10,000
Windshield Survey: CB #5's 7 Commercial Districts	\$3,500 to \$5,000
CB #5 Market Analysis	\$20,000
Selected Merchant Interviews: CB #5's 7 Commercial Districts	
Commercial Revitalization Activities: Administrative (I.e work with Bronx Overall Economic Development Corp., existing merchant associations, LDCs, BIDs, etc.)	
Evaluate Potential for Light Rail Transit Along Fordham Road Corridor	TBD
Commercial Streetscape Studies: Fordham Road Commercial Areas	\$20,000
Commercial Streetscape Studies: 1 or 2 Other Commercial Strips	\$15,000
Community Visioning: Targeted Questionnaire, Follow-up Interviews	\$5,000 to \$10,000
Community Visioning: Public Forums / CB Meetings	\$10,000 to \$15,000
Harlem Riverfront: Inventory Existing Conditions / Analysis	\$10,000
Harlem Riverfront: Explanade Construction Recommendations	\$10,000
Harlem Riverfront: Identify Waterborne Transportation Options	\$10,000
Harlem Riverfront: Regatta Park (Work with BP)	\$2,500
Streetscape Studies: Fordham Road Gateway	\$12,000
Streetscape Studies: Jerome Avenue Gateway	
Streetscape Studies: MLK, Jr. (University Avenue) Gateway	
Reconsider CB Boundaries	\$5,000
Grand Concourse: Noncomplying / Nonconforming Conditions Review	\$20,000
Grand Concourse: Strategy Development	
Grand Concourse: Historic District Extension	
TOTAL (excluding light rail transit feasibility)	\$148,000 to \$164,500

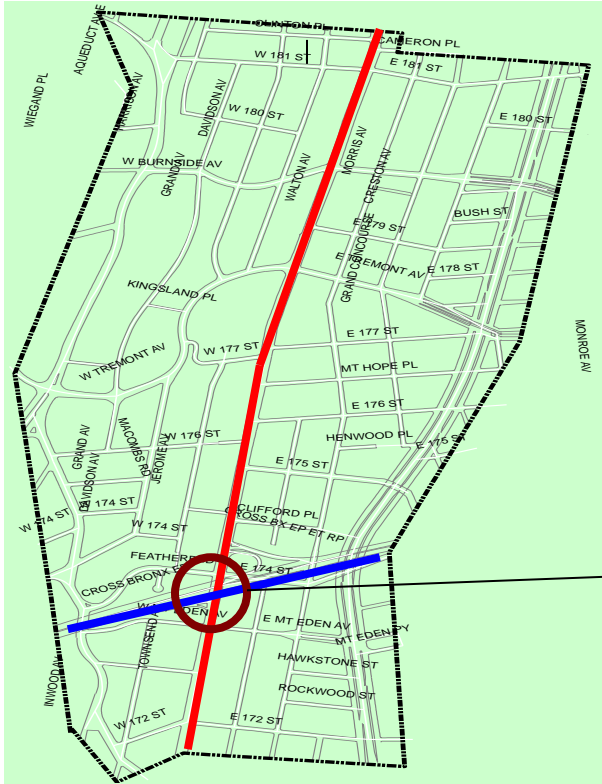
CHAPTER VI: POTENTIAL FUNDING SOURCES

Appendix D contains excerpts from The Bronx: An Economic Review prepared in April 20-02 by New York State Comptroller H. Carl McCall. One excerpt – labeled Appendix P lists Economic Development Resources.

Additional potential funding sources include the following:

- Local banking institutions
- Local corporate partners
- TEA-21 funds
- Environmental Preservation bond funds; Clean Air, Clean Water Act funding
- Local elected officials discretionary funding

Jerome Avenue Transportation Study



EXISTING AND FUTURE CONDITIONS WITH RECOMMENDATIONS FINAL REPORT



Michael R. Bloomberg
Mayor



Janette Sadik-Khan
Commissioner



A Member of the New York
Metropolitan Transportation Council

February 2012

Jerome Avenue Transportation Study
Existing and Future Conditions
with Recommendations
Final Report
PTDT10D00.H08

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Prepared by:

New York City Department of Transportation

Janette Sadik-Khan, Commissioner

Lori Ardito, First Deputy Commissioner

Bruce Schaller, Deputy Commissioner

Ryan Russo, Assistant Commissioner

Constance Moran, Bronx Borough Commissioner

Charles Ukegbu, Bronx Borough Deputy Commissioner

Naim Rasheed, Project Director

Michael Griffith, Deputy Project Director

Milorad Ubiparip, Project Manager

Carren Simpson, Highway Transportation Specialist

Joe Li, City Planner

Ali Jafri, Highway Transportation Specialist

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Evaluation of One-way Proposal – Mt. Eden Avenue between Jerome Avenue and Macombs Road

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EXECUTIVE SUMMARY

1.0 Introduction

The Jerome Avenue Transportation Study was initiated at the request of Bronx Community Boards 4 and 5 in response to growing traffic congestion in the area and to address mobility and safety for all street users (motorists, cyclists, pedestrian, and transit). The study area has a mix of land uses with residential, local retail and auto related uses attracting a significant amount of vehicular and pedestrian trips. The study area extends from 172nd Street in the south to 181st Street in the north and from Grand Concourse in the east to Martin Luther King Boulevard/University Avenue in the west. The study assess existing and future traffic conditions including demographics, zoning & land use, traffic, goods movement, pedestrians & bicycles, accidents & safety, parking and public transportation. The study recommends various improvement measures to address congestion and safety.

2.0 Demographic Analysis

The study area overlaps Bronx Community Districts 4 and 5, and includes 11 census tracts. The demographic analysis of the study area examined population trends from 1990 to 2010 and projects trends for 2018. For 1990 to 2010, the population in the study area increased 10% from 36,765 to 41,067; number of households increased by 12% and household size decreased from 2.14 to 2.08 person/household; the median household income increased 49% from \$14,608 to \$28,800. In 1990, 73% of the study area population used public transit for journey to work, (55% subway, 14% buses and 4% railroad/ferry/taxi) and 22% used private automobiles, while 5.5% used other modes. In 2000, the share dropped to 66% (49% subway, 14% buses and 3% railroad/ferry/taxi). Private auto share was 23%, while 11% traveled by other modes.

3.0 Zoning and Land Use

The study area is zoned mainly for residential and commercial uses, but it also has a special Grand Concourse Preservation District. There are three residential districts within the study area: R5, R7-1 and R8; three commercial zoning districts: C8-3, C1-4 and C2-4; and no designated manufacturing zoning districts. The study area contains various land uses

including single and two family houses, multi-family apartment buildings, educational institutions, auto-related uses, restaurants, local retail and community facilities. Many auto-related uses (repair shops) exist along Jerome Avenue and parts of Macombs Road/Inwood Avenue. There are limited vacant lots for future developments.

4.0 Traffic

To analyze the existing and future traffic conditions in the study area, basic roadway characteristics were surveyed and a traffic data collection plan (Automatic Traffic Recorders, manual turning movement counts, vehicle classifications and pedestrian counts) for the various peak periods was executed. The Grand Concourse, University Avenue/MLK Boulevard and Jerome Avenue near the Cross Bronx Expressway experience congestion during most peak periods. Levels of service (LOS) analyses were conducted at 32 intersections with most operating at LOS A, B, C, and up to mid-level D. However, some intersections along major corridors experienced LOS E or F on one or more lane groups during one or more peak periods. There is one “through truck” route (CBE) and three “local truck” routes in the study area

5.0 Pedestrians and Bicycles

Pedestrian and bicycle activities were examined in the study area. Pedestrian analysis focused on areas with high pedestrian concentrations (near subway, bus stations and transfer points, retail/commercial strips, schools, and high density residential developments). The pedestrian analysis, which focused on crosswalks and corners showed the majority of crosswalks and corners operated at an acceptable LOS C or better. There are two “bicycle lanes” and one “bicycle route” in the study area and two “bicycle routes” are proposed for East 181st Street/Grand Avenue and Tremont Avenue.

6.0 Accidents/Safety

The accident analysis conducted for the study area screened all intersections from 2008 to 2010. After reviewing all the intersections in the study area, detailed analysis was done for eight locations for the recent four years. From the analysis, only one intersection (Burnside Avenue/Jerome Avenue) qualified as a “High Accident Location” with seven pedestrian

accidents in 2008. Three locations had an average of ten accidents during the four year period: Jerome Avenue and Mt Eden Avenue, Jerome Avenue and Featherbed Lane, and Grand Concourse and East Tremont Avenue. During the four-year period 269 people were injured as a result of 206 accidents occurring at the eight locations. Forty four of the injuries involved pedestrians. The highest numbers of injuries (49) were recorded at East 174th Street and Jerome Avenue.

7.0 Parking

A parking survey/inventory of on and off-street facilities was conducted during the AM, midday, and PM peak hours to determine existing parking capacity and utilization. There are 44 off-street parking facilities with a total of 2,021 spaces in the study area. On weekdays, utilization during the midday peak is about 75%. There are approximately 3,628 on-street parking spaces in the study area depending on parking regulations. On-street parking utilization was approximately 80% during the weekday. However, along the most congested commercial corridors (Jerome and Burnside Avenues), the parking demand is above 90%.

8.0 Public Transportation

The study area is well served with public transportation by three subways and ten bus lines, with a transit hub at Macombs Road, East 175th Street, Jerome Avenue and Grand Concourse. Three subway lines (#4, D & B) use two routes (Jerome Avenue and Grand Concourse) serving five subway stations; and eight local and two express bus lines serve the entire study area. The bus routes operate on five major corridors: Macombs Road/University Avenue, Jerome Avenue, Burnside Avenue, Tremont Avenue and Grand Concourse.

9.0 Recommendations

Seven intersections have been identified for roadway and pedestrian safety improvements that include sidewalk and median extensions and restriping, eleven intersections for signal timing modifications, six truck loading/unloading zones, bus stops relocation, and a one-way conversion.

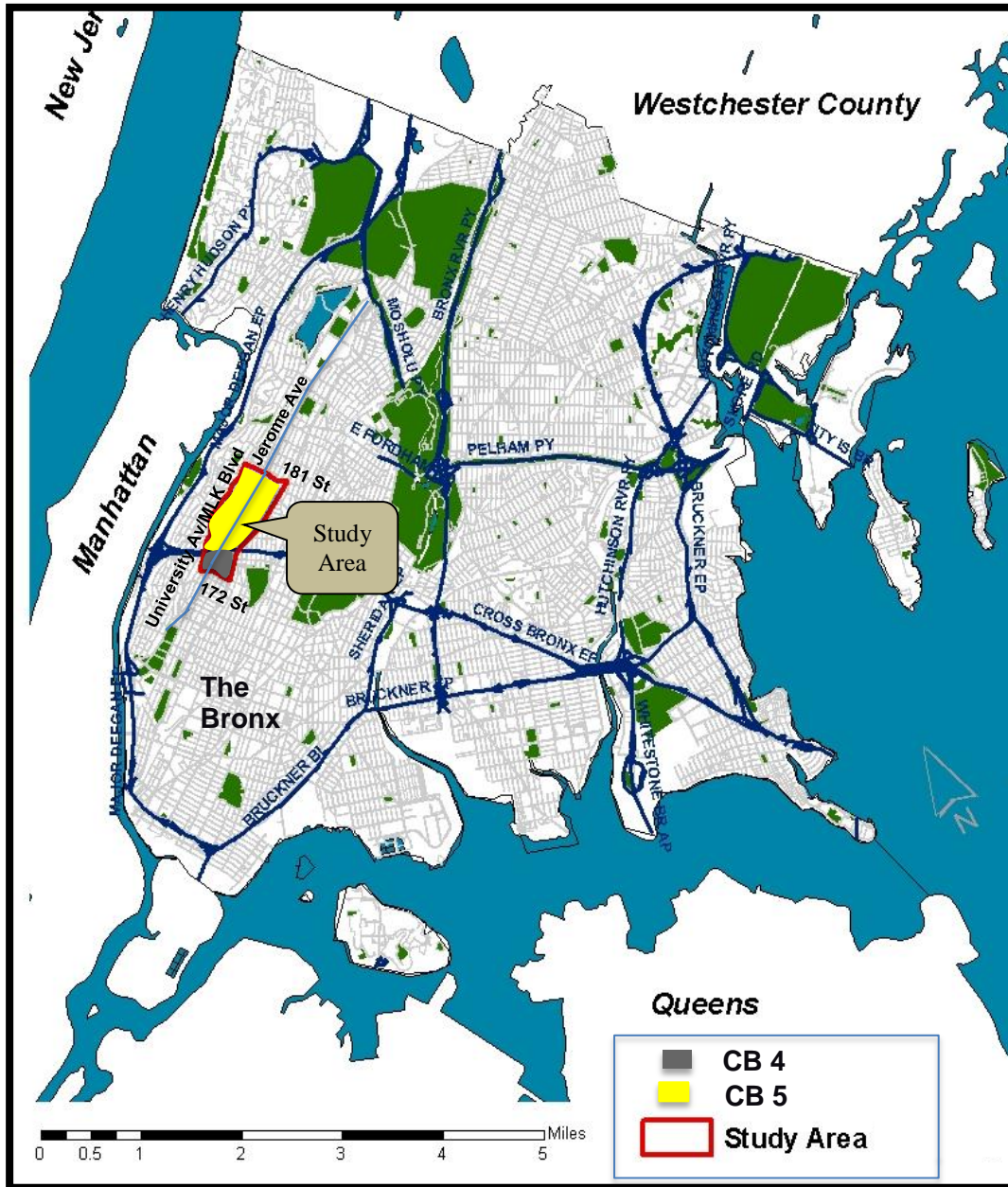
1.0 INTRODUCTION

1.1. Background

This study is being conducted in response to growing traffic congestion in the area and requests from the community to address traffic circulation and safety for all road users. The area has a mix of land uses with residential, local retail and auto related uses attracting a significant amount of vehicular and other trips. The study area which extends from 172nd Street in the south to 181st Street in the north and from Grand Concourse in the east to Martin Luther King Boulevard in the west is divided into four quadrants by two major arterials: the Cross Bronx Expressway (CBE) running east-west and Jerome Avenue, running north-south. The Cross Bronx Expressway connects to George Washington Bridge in the west providing access to New Jersey and to the Throgs Neck and Whitestone Bridges in the east accessing Queens. The below grade CBE divides the study area limiting access between the north and south halves of the study area. Community Boards 4 and 5 have expressed concern about congestion on Jerome Avenue and especially at the access ramps to the CBE. The problem was also identified in the Bronx Arterial Needs Major Investment Study (MIS) conducted by NYS DOT in 2004. Exhibit 1-1 shows the study area with Community Boards 4 and 5 in a regional setting.

The study seeks to identify traffic and transportation problems in the area and to develop recommendations to improve traffic circulation, enhance safety for all street users (vehicles, pedestrians, bicycles) as well as reduce congestion. It would also explore ways to connect the northern and southern parts of the study area.

Exhibit 1-1
Study Area in Regional Setting



2 Study Area

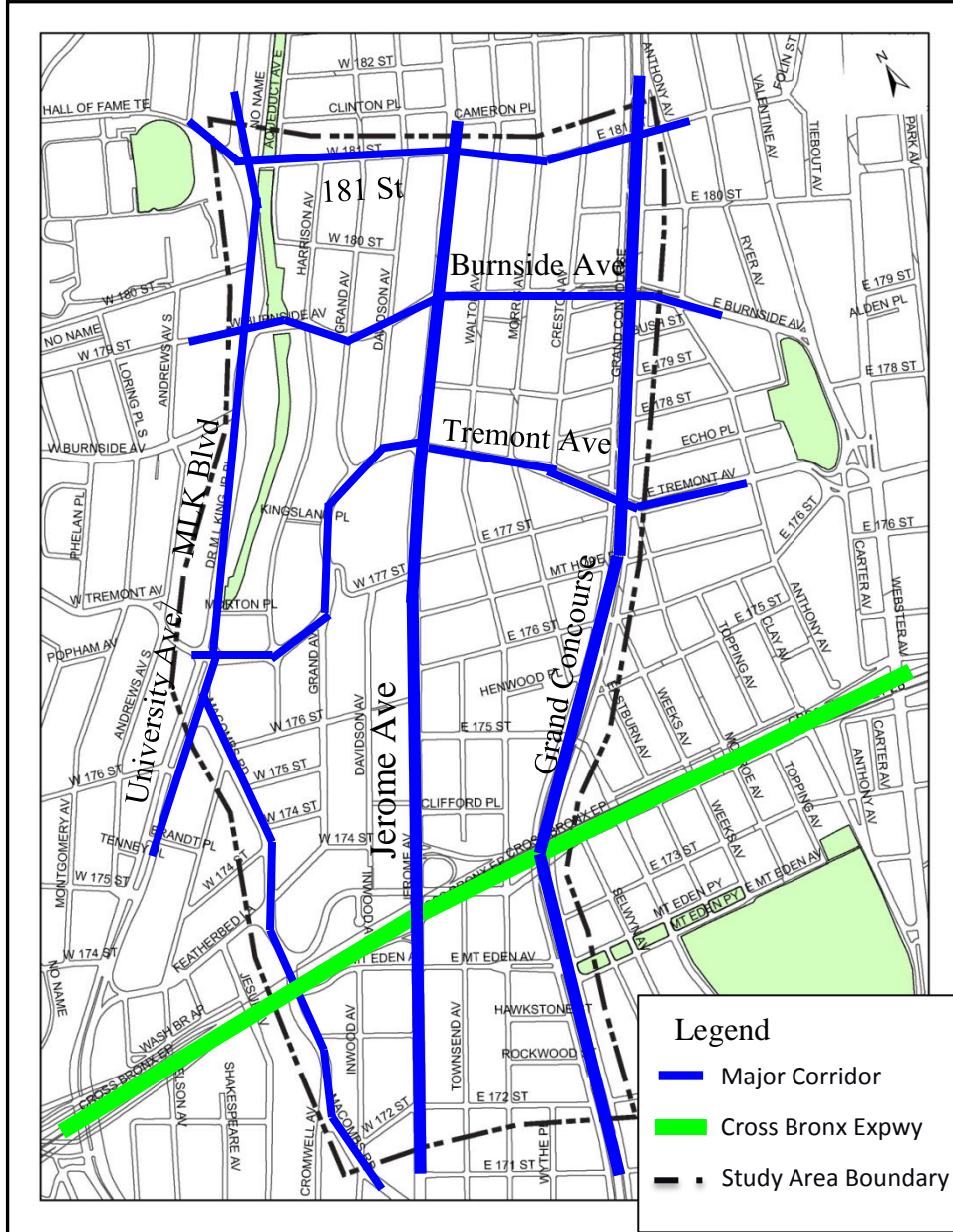
The study area is located in the western part of the Bronx, in the vicinity of the Major Deegan Expressway (I-87), Harlem River, and George Washington Bridge. It is bounded by 181st Street to the north, 172nd Street to the south, Grand Concourse to the east and Macombs Road/Dr. Martin Luther King Boulevard to the west. It is made up of two neighborhoods – Mount Eden and Morris Heights. The study area street network has limited north-south connections as many streets are discontinuous and dead end at the CBE. There are four major ramps to and from the CBE connecting to Jerome Avenue that are generally congested. Exhibit 1-2 shows the study area boundaries with major corridors in the study area.

The study area primarily consists of row houses and multi-family dwellings except along major corridors where small commercial businesses and other retail establishments exist. There are mainly auto repair shops and car dealerships on Jerome Avenue.

The study area is well served by public transportation - buses and subways operated by NYCT.

Exhibit 1-2

Study Area Boundaries and Major Corridors



1.3 Goals

The goal of the study is to reduce traffic congestion, improve internal traffic circulation, streetscape, and enhance safety for all road uses with affective community participation.

1.4 Objectives

The study objectives are:

- to assess the existing and future travel and traffic conditions;
- to identify constrains to internal vehicular and pedestrian circulation with specific emphasis on limited crossings over Cross Bronx Expressway;
- to develop a package of recommendations with improvement measures to reduce vehicular congestion, improve pedestrian access and circulation, enhance safety for all street users (vehicles, pedestrians, bicycles) and general streetscape; and
- to foster a sense of community support through extensive public participation.

1.5 Project Organization and Methodology

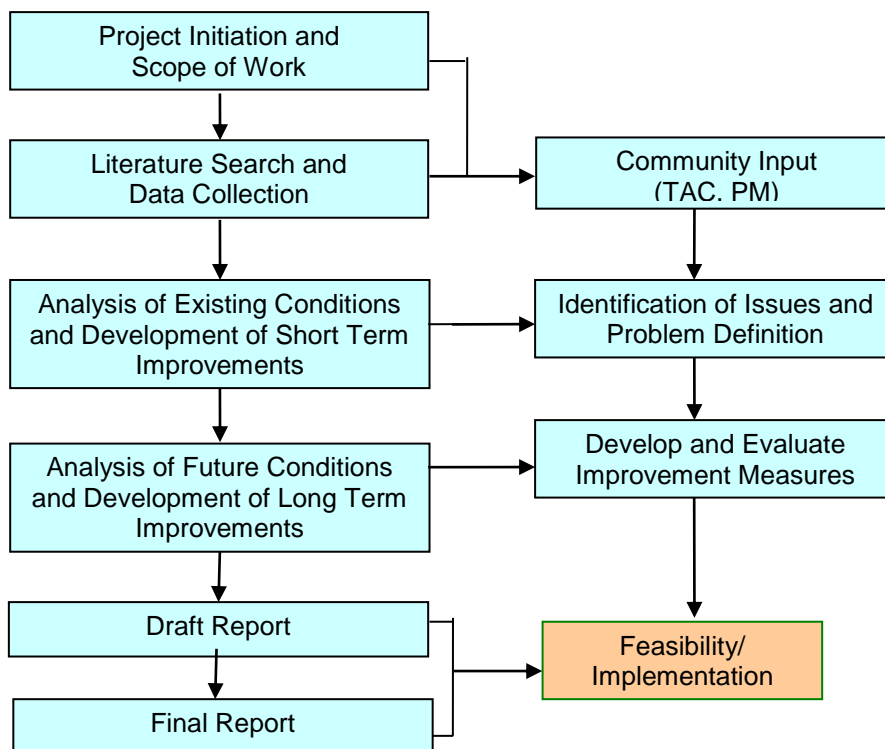
The study will examine the following issues to help in problem identification, definition, and the development off effective solutions:

- *Demographics*
The study will conduct a basic demographic analysis to examine socioeconomic characteristics, population trends, income, households, vehicle ownership and general travel information.
- *Existing Land Use and Zoning*
It will examine land use/major trip generators and any proposed zoning in the study area that can impact trip generation and traffic.
- *Vehicular Traffic*
It will assess traffic congestion, circulation, roadway capacity and level of service (LOS) for 32 locations.
- *Goods Movement*
It will examine truck routes (local and through), delivery patterns, frequency, size of trucks, loading and unloading activities to determine needs.

- *Pedestrians and Bicycles*
Inventory pedestrian volumes, evaluate safety on major routes, commercial sites, businesses, and schools. It will conduct capacity analysis in crosswalks and corners, and evaluate the need for new bike routes and promote bicycle usage.
- *Accident and Safety*
The study will conduct an analysis of accident history and trends, types and classes of accidents and provide adequate countermeasures.
- *On and Off-Street Parking*
The study will inventory the existing off and on street parking facilities, parking demand and supply, utilization, parking regulations, fee structure, and double and illegal parking.
- *Public Transportation*
The study will inventory subway and bus lines and routes, stops and layovers, transit ridership, intermodal transfer points, schedules and intervals of services.

The following chart shows the study process.

Study Process



2.0 DEMOGRAPHIC ANALYSIS

The demographic analysis relied on data from New York City Department of City Planning (NYCDCP), and computer files issued by the United States Department of Commerce – Bureau of the Census for the last two decades (years 1990, 2000 and 2010).

The study area which cuts across two community districts (Nos. 4 and 5) consists of the following Census Tracts: 215.02*, 217.01, 217.02, 223*, 227.01, 227.02, 233.01, 235.01, 241, 243 and 251*, eight fully and three partly within the study area.

Table 2-1 shows the census tracts, community districts and the percentage in population.

Table 2-1: Study Area Census Tracts and Population

No.	Census Tract	Community District	Portion in Study Area	Population			Change 1990-2010 (%)
			(%)	1990	2000	2010	
1	215.02*	5	45	2,126	3,027	2,723	22
2	217.01	4/5	100	4,557	5,051	4,797	5
3	217.02	4	100	952	467	537	-77
4	223*	4	50	3,926	4,841	2,864	-37
5	227.01	4/5	100	4,043	3,036	5,196	22
6	227.02	5	100	1,198	1,710	1,964	39
7	233.01	5	100	4,122	4,916	4,377	6
8	235.01	5	100	3,385	4,405	3,341	-1
9	241	5	100	4,693	5,955	6,182	24
10	243	5	100	4,865	5,415	5,685	14
11	251*	5	50	2,898	3,320	3,401	15
Total Population:				36,765	42,143	41,067	10

* Tracts partly within the study area.

2.1 Population

The population in New York City, the Bronx, and the study area increased considerably by 8.6%, 9.7%, and 12.8%, respectively, between 1990 and 2000 by gaining 685,714, 128,861, and 5,378, people, respectively. Between 2000 and 2010, the New York City and Bronx population increased by 2% and 3.8%, while the population in the study area decreased by 2.6%, respectively.

The study area population of 41,067 (2010) is expected to exhibit similar trend to the Bronx. Based on projections for 2018, the study area population is expected to increase to 42,295 in 2018. Table 2-2 below shows the “population by area” for the study area, the Bronx, and New York City, for 1990, 2000, 2010, with 2018 projections.

Table 2-2: Population by Area

Census Year	New York City	% Change	Bronx	% Change	Study Area	% Change
1990	7,322,564	-	1,203,789	-	36,765	-
2000	8,008,278	8.6	1,332,650	9.7	42,143	12.8
2010	8,175,133	2.0	1,385,108	3.8	41,067	-2.6
2018*	8,461,263	3.5	1,404,500	1.4	42,295	1.5

* 2000-2030 NYC Population Projection by Age/Sex & Borough, DCP & DOT Traffic Planning projections for 2018.

2.2 Household Characteristics

The number of households in the study area, between 1990 and 2000, increased by 13.9% from 11,708 to 13,336; the Bronx increased by 9.5% from 423,191 to 463,242; and New York City increased by 7.3% from 2,816,274 to 3,022,477.

The average household size in the study area remained relatively constant at 3.14 and 3.16 in 1990 and 2000. Household size in the Bronx and New York City also remained relatively constant at 2.84 and 2.88, and 2.60 and 2.65 in 1990 and 2000, respectively. Table 2-3 below shows household characteristics for New York City, the Bronx and the study area.

Table 2-3: Household Characteristics

Area	Number of households			Persons Per Household		
	1990	2000	% Change	1990	2000	% Change
Study Area	11,708	13,336	13.9	3.14	3.16	0.6
Bronx	423,191	463,242	9.5	2.84	2.88	1.4
NYC	2,816,274	3,022,477	7.3	2.60	2.65	1.9

The average household size in the study area, the Bronx, and New York City is expected to remain relatively constant through 2018.

2.3 Median Household Income

The median household income for New York City, the Bronx and the study area in 1990 and 2000 were \$32,262, \$21,944, \$14,608 and \$38,293, \$27,611, \$21,522, respectively. The median household income increased by 19, 21, and 32 percent from 1990 to 2000, for New York City, the Bronx, and the study area, respectively. The median household income in the study area increases faster than City and the Borough incomes but is far below their rates.

Based on a simple extrapolation, the estimated median household income for New York City, the Bronx, and the study area in 2018 is \$62,611, \$43,534 and \$35,260, respectively (see Table 2-4).

Table 2-4: Median Household Income by Area

Census Year	New York City (\$)	% Change	Bronx (\$)	% Change	Study Area (\$)	% Change
1990	32,262	19	21,944	21	14,608	32
2000	38,293		27,611		21,522	
Projected Median Household Income						
2008*	48,488	27	33,986	23	26,460	23
2018**	62,611	29	43,534	28	35,260	33

* 2030 Demographics and Socioeconomic Forecast NYMTC

** DOT Traffic Planning projections for 2018.

2.4 Vehicle Ownership

The vehicle ownership in New York City and the Bronx increased by approximately 11% and 9%, respectively, while in the study area it decreased by 7% between 1990 and 2000. In 1990, about 44%, 39%, and 19% of the total households in the city, the borough and the study area owned a vehicle, while in 2000 it was approximately 46%, 38%, and 17%, respectively.

The number of households with one, two, three or more vehicles increased by approximately 12%, 8%, and 5%, in the city and by 10%, 4% and 7%, in the borough between 1990 and 2000, respectively. The number of households with one vehicle in the study area decreased by 9%, those with two vehicles increased by 13%, and those with three or more vehicles showed no change. The number of households with ‘no vehicles’ increased by 7%, 10% and 8%, in the city, the borough and the study area, respectively. Table 2-5 and charts below show the vehicle ownership rates per household in the city, borough, and the study area for 1990 and 2000.

Table 2-5: Vehicle Ownership per Household (1990 and 2000)

No. of Vehicles per Household	NYC			Bronx			Study Area		
	No. of Households		% Change	No. of Households		% Change	No. of Households		% Change
	1990	2000		1990	2000		1990	2000	
0	1,572,090	1,682,946	7	259,401	285,309	10	3,790	4,068	7
1	887,309	995,165	12	121,102	133,331	10	810	735	-9
2	282,593	305,267	8	34,494	35,841	4	94	106	13
3+	74,282	78,246	5	8,194	8,731	7	0	0	0
Total HHs	2,816,274	3,022,477	7	423,191	463,212	9	4,694	4,909	5
Total Vehicles Available	1,244,184	1,378,678	11	163,790	177,903	9	904	841	-7
Avg. Vehicles per HH	0.44	0.46	3	0.39	0.38	-0.8	0.19	0.17	-11

No significant changes in the vehicle ownership are expected by 2018.

2.5 Journey to Work by Mode

The journey to work data shown in Table 2-6 indicates that in 1990 and 2000 New York City public transportation accounted for 54.7% and 54.4% of all work trips, while in the Bronx it was 57.2% and 54.7% and in the study area it was 73% and 66.4%. Thus, the study area transit share is higher than the Bronx and City in 1990 and 2000. Trips by subway accounted for 37.7% and 38.7% in New York City, 37.5% and 35.2% in the Bronx and 55% and 48.8% in the study area. The automobile share (including drive alone and carpooling) in New York City was 33.5% and 33.9%, the Bronx was 34.9% and 37%, and 21.6% and 23.1% in the study area. Journey to work by taxicabs, ferry and railroad represented less than 4% all round in 1990 and 2000. In 1990 and 2000, walking represented 11% and 10.7%, 7.2% and 7.4%, and 4.4% and 8.2% in New York City, Bronx and the study area, respectively. Due to low auto ownership and income rates there is more reliance on transit than on the automobile usage. Exhibit 2-1 shows Journey to Work Mode Share for 2000. Journeys to work mode share for 2010 and 2018 are not expected to change significantly.

Table 2-6: Journey to Work Mode Share (1900 & 2000)

Mode	New York City				Bronx				Study Area			
	1990		2000		1990		2000		1990		2000	
	Journey (#)	Share (%)	Journey (#)	Share (%)	Journey (#)	Share (%)	Journey (#)	Share (%)	Journey (#)	Share (%)	Journey (#)	Share (%)
Car, Truck, or Van	1,036,654	33.5	1,049,396	33.9	147,789	34.9	150,885	37	903	21.6	909	23.1
Drove Alone	765,151	24.7	794,422	25.6	107,020	25.3	112,159	27.5	676	16.1	339	8.6
Carpooled	271,503	8.8	254,974	8.2	40,769	9.6	38,726	9.5	227	5.4	511	13.0
	2,073,308		2,098,792		295,578		301,770		1,806		1,759	
Public Transportation	1,693,254	54.7	1,684,850	54.4	241,848	57.2	222,835	54.7	3,058	73.0	2,609	66.4
Bus	403,477	13.0	364,408	11.8	70,665	16.7	64,918	15.9	600	14.3	545	13.9
Subway	1,168,346	37.7	1,199,226	38.7	158,679	37.5	143,534	35.2	2,306	55.0	1,919	48.8
Railroad	54,716	1.8	51,141	1.6	8,737	2.1	8,113	2.0	83.0	2.0	58.0	1.5
Ferry	16,619	0.5	11,193	0.4	97	0	106	0	0	0	9.0	0.2
Taxicab	50,096	1.6	53,781	1.7	3,670	0.9	5,495	1.3	69	1.6	78.0	2.0
	3,386,508		3,364,599		483,696		445,001		6,116		2,609	
Motorcycle	1,711	0.1	1,488	0	123	0.03	179	0.04	0	0	0	0
Bicycle	9,643	0.3	15,024	0.5	662	0.2	987	0.2	8	0.2	23	0.6
Walked	340,077	11	332,264	10.7	30,422	7.2	30,076	7.4	185	4.4	324	8.2
Other means	16,992	0.5	16,897	0.5	2,201	0.5	2,357	0.6	36	0.9	67	1.7
	368,423		365,673		33,408		33,599		229		414	
Total Trips	3,098,331		3,099,919		423,045		407,319		4,190		3,932	

Exhibit 2-1: Journey to Work Mode Share (2000)

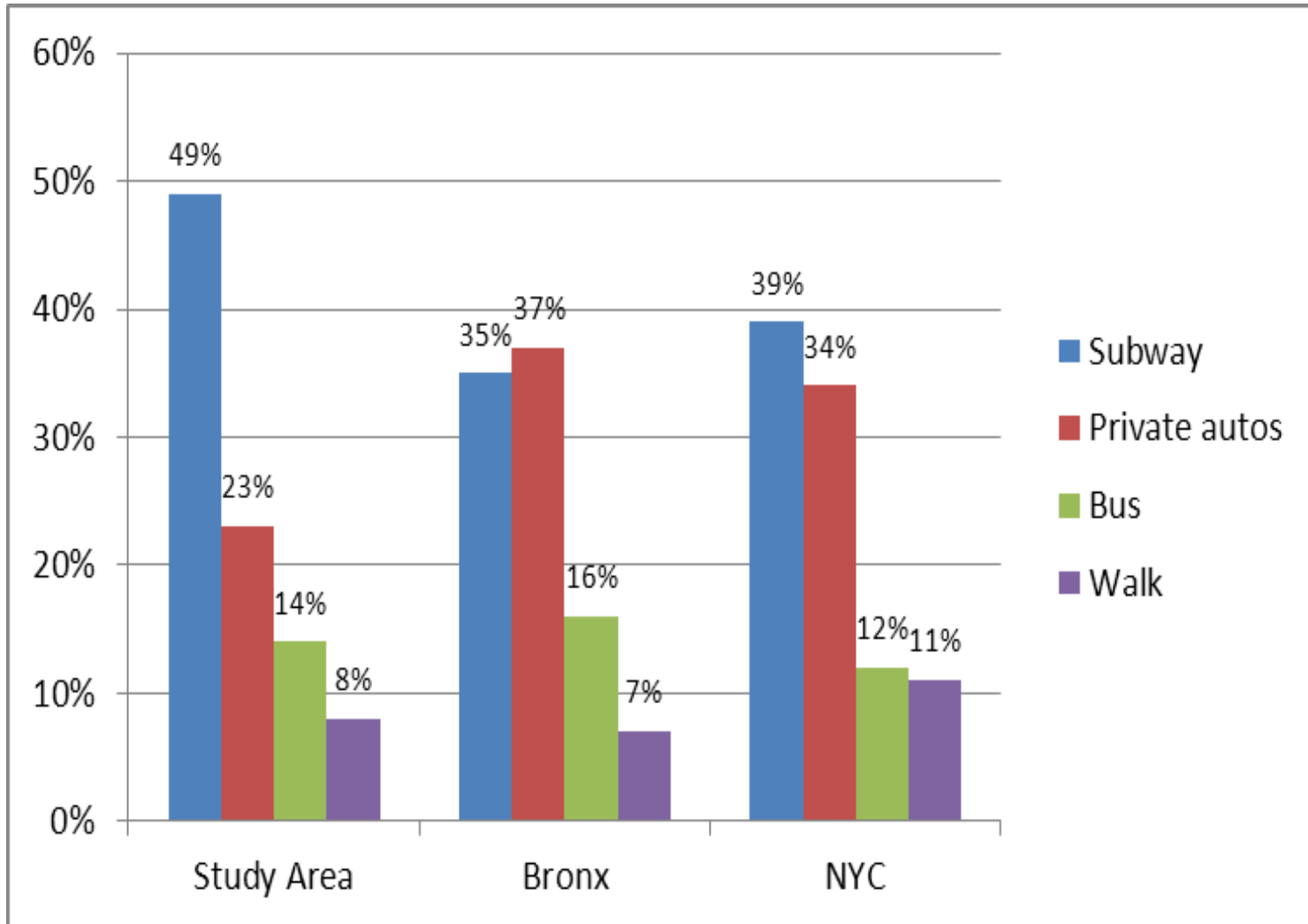


Table 2-7 below shows a summary of the basic socio-economic characteristics for the study area.

Table 2-7: Summary of Socio-economic Characteristics

Study Area						
Year	Total Population	No. of Households	Household Size	Median HH Income	Avg. veh. per HH	Journey to work (No. of trips)
1990	36,765	11,708	3.14	\$14,608	0.19	4,190
2000	42,143	13,336	3.16	\$21,522	0.17	3,932
2010*	41,067	13,342	3.08	\$28,800	0.18	3,976
2018*	42,295	13,376	3.17	\$35,260	0.18	4,065

* DOT Traffic Planning projections for 2018.

3.0 ZONING AND LAND USE

3.1 Zoning

The city is divided into three basic zoning districts: residential (R), commercial (C), and manufacturing (M). The three basic categories are further subdivided to facilitate lower, medium, and higher density developments. Development within these districts are subject to regulations that determine use, building size, and parking provisions.. Below is a brief description of the three basic zoning districts according to the Zoning Handbook.

Residential District (R)

There are ten standard residential districts, R1 through R10 with R1 representing the lowest density and R10 the highest.

Commercial District (C)

Commercial districts ranging from C1 to C8 reflect the full range of commercial activity from local retail and service establishments to high density, shopping, entertainment and office uses. The C1 and C2 districts are designed to serve local needs, C4 for shopping centers outside the central business district, C5 and C6 districts are for the central business districts that serve the city and region, and three C3, C7, and C8 districts are designed for special purposes (waterfront activity, large commercial amusement parks and heavy repair services).

Manufacturing District (M)

Manufacturing districts ranging from M1 to M3 along with performance standards establish limits on the amount and type of industrial nuisances which may be created. The more noxious uses are restricted to M3 districts but they may be permitted in M1 and M2 districts if they comply with performance standards of those districts. Retail and commercial uses are permitted in manufacturing districts with some exceptions while residential and community facility uses are excluded from most manufacturing districts.

Zoning Districts in the Study Area

The study area is zoned mainly for residential and commercial activities. In addition to residential and commercial districts there is a special Grand Concourse Preservation District. Figure 3-1 shows the zoning districts in the study area.

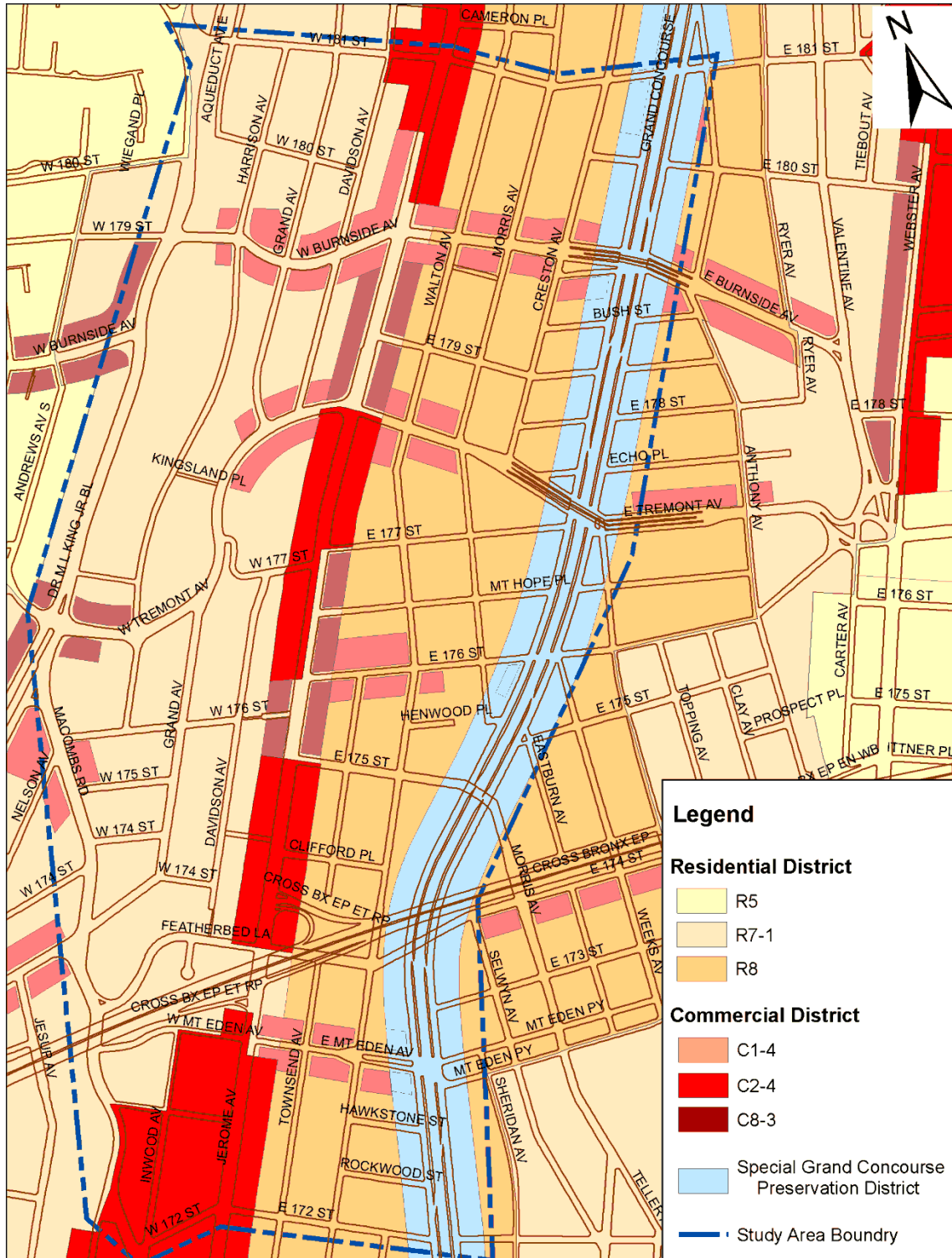
Residential Zoning Districts

There are three residential districts within the study area: R5, R7-1 and R8. The R5 residential zoning district represents approximately 1% of the study area and is concentrated in the northwest area near Aqueduct Avenue. An R7-1 district, representing approximately 50 percent of the study area, is located mainly west of Jerome Avenue and north of Cross Bronx Expressway. The R7-1 residential zoning district south of Cross Bronx is concentrated around Macombs Road that forms the western boundary of the study area. Several blocks along the east side of Jerome Avenue are also zoned R7-1, primarily between 175th and 177th Streets and between Tremont and Burnside Avenues. An R8 district, representing approximately 40 percent of the study area, is mapped east of Jerome Avenue, west of Townsend Avenue to Grand Concourse, and from 172nd Street to 181st Street.

Commercial Zoning Districts

Commercial zoning district, C8-3, represents eleven percent of the study area. The C8-3 zoning designation permits automotive and other heavy commercial services. Typical uses are automobile showrooms and automotive service facilities. Housing is not permitted in C8-3 district. The maximum commercial FAR for this zoning district is 2.0. The C8-3 districts can be seen in Figure 3-1.

Figure 3-1: Zoning Districts in the Study Area



There are several Commercial Overlays in the study area such as C1-4 and C2-4, representing about nine percent of the study area as shown in Figure 3-1. They are usually mapped along major avenues/arterials such as Burnside Avenue, Tremont Avenue, Macombs Road, East 176th Street, and Mt. Eden Avenue in residential districts. Table 3-1 shows the floor area ratio (FAR) for the commercial districts in the study area.

The special Grand Concourse preservation district is mapped along Grand Concourse, overlaying the R-8 residential zoning.

Manufacturing Zoning Districts

There are no designated manufacturing zoning districts in the study area, but there are numerous industrial amenities such as auto-related businesses (repair shops), along Jerome Avenue and parts of Macombs Road/Inwood Avenue.

Table 3-1 below shows the floor area ratio (FAR) for the zoning districts.

Table 3-1: Zoning Districts/with FAR in the Study Area

Zoning District	Maximum Residential FAR	Maximum Commercial FAR*	Maximum Community FAR	Approximate percentage in the study area
R5	1.25	1	2	1
R7-1	0.87 – 3.44	2	4.8	50
R8	0.94 – 6.02	2	6.5	40
C8-3		2.00	6.5	11
C1-4 overlay district	*	2.00		6
C2-4 overlay district	*	2.00		3

* Represents maximum FAR for commercial overlay district which permits a wide range of local retail and personal service establishments needed in a residential neighborhood. Typical uses include grocery stores, small dry cleaning establishments, restaurants and barber shops. Source: *Department of City Planning Zoning Data Tables*

3.2 Land Use

The study area contains various land uses including numerous single and two family houses, multi-family apartment buildings, educational institutions, auto-related uses, restaurants, local retail and community facilities. A land use/field survey was conducted, which was complimented by secondary data from the other city agencies mainly the (NYC) Department of City Planning (DCP) and other web sites. Figure 3-2 shows the existing land use in the study area.

One and Two –Family Residences

One, two and three-family residences are scattered throughout the study area but are mainly concentrated on east-west streets such as along Harrison Avenue between West Tremont Avenue and West 181st Street and along Davidson Avenue between West Burnside Avenue and West 181st Street.

Photos below show typical one, two and three family residences in the study area.

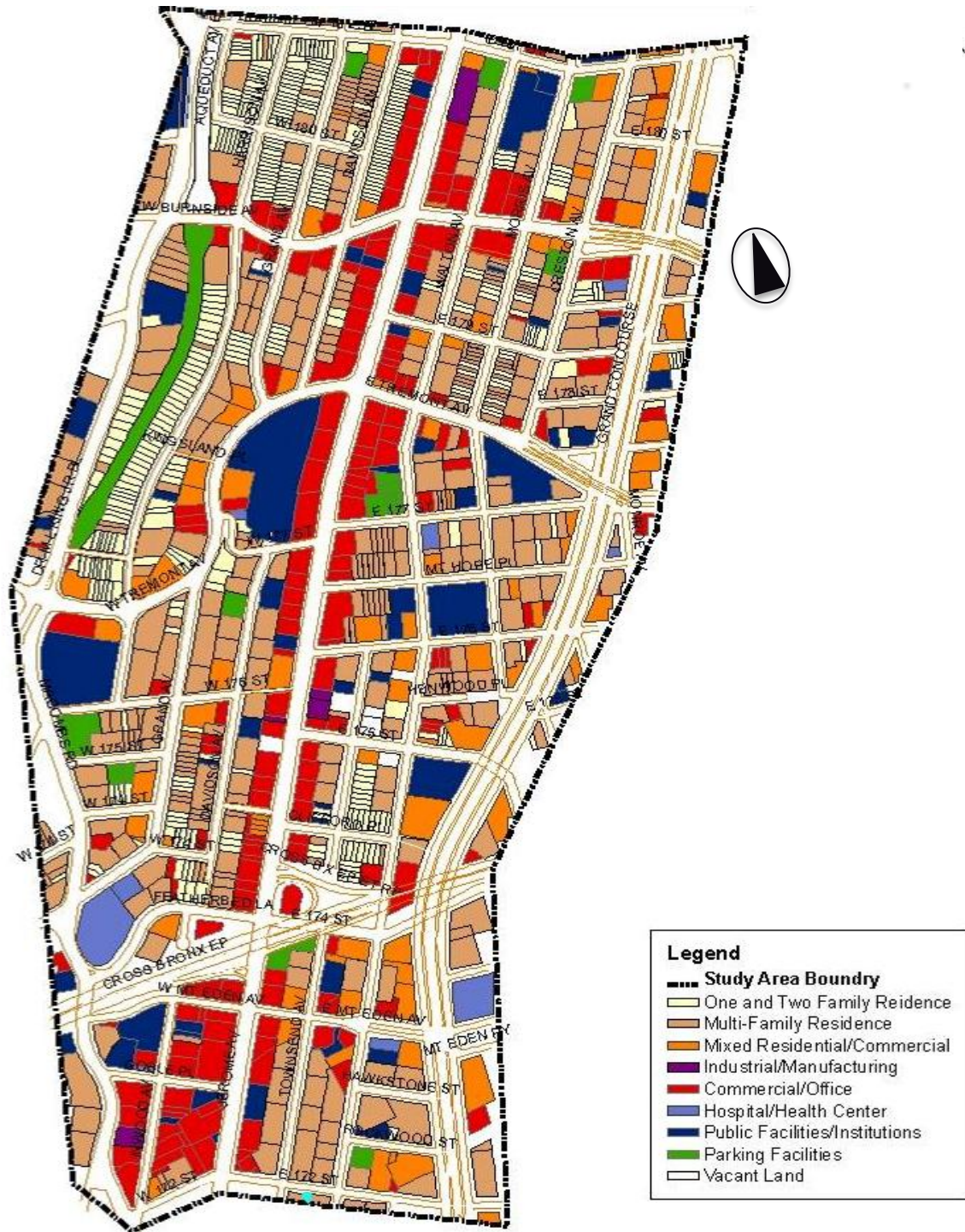


One and two family residences



Two and three family residences

Figure 3-2: Land Use



Multi-Family Apartment Buildings

Most of the study area consists of high-rise apartment buildings. The northwest quadrant has mainly six-story buildings along with areas south of the Cross Bronx Expressway and west of Jerome Avenue. On Macombs Road there are building structures with seven and eight stories. Around Grand Concourse Boulevard numerous high-rise residential buildings, in particular between E. 175th and E. 174th Streets exist. Also, there are two 12-story and three 8-story apartment buildings in the area. Residential densities are highest between Grand Concourse and the east side of Walton Avenue from E. 175th St. to the Cross Bronx Expressway. In this area there are three 16-story residential buildings, three 12/14-story buildings, and several 8-story apartment buildings. Photos below show examples of typical six family and high-densities residential developments in the study area.



Six-story residences



High density residences

Mixed Residential/Commercial Developments

Many of the residential buildings along the major corridors are mixed residential/commercial buildings with ground floor retail. These are scattered throughout the study area and are common along Jerome Avenue, Burnside Avenue, Tremont Avenue, Mt. Eden Avenue, and E. 176th Street.

Commercial Land Use

Commercial activity found in the study area include discount stores and retail shops, hardware stores, cleaners, flower shops, barber shops/salons, money services, laundromats, delis, groceries and restaurants. There are also several fast food chain (McDonalds, Dunkin Donuts) restaurants and community facilities. The land use along Jerome Avenue and parts of Macombs

Road/Inwood Avenue is almost entirely of a commercial/industrial nature with predominantly auto-services (used car dealerships, repair shops, auto parts), and parking garages. Along Grand Concourse, commercial uses are interspersed with residential buildings. They include groceries, supermarkets, pharmacies, Western Union, Kennedy Fried Chicken, travel agencies and real estate offices. Most of the commercial land uses are situated on the ground floor of residential buildings.

Industrial Land Use

There are numerous industrial uses in the study area such as auto-related businesses (repair shops), predominantly along Jerome Avenue and Macombs Road/Inwood Avenue.

Community/Institutional Facilities

There are numerous community and institutional facilities located throughout the study area. These represent one hospital and several health care and medical/dental clinics, schools, daycare facilities, churches and religious institutions. There is also a university complex (Bronx Community College - CUNY) located on the north-western corner of the study area. Also exist a residence for formerly homeless and mentally ill, drug rehabilitation center, a college assistance program center and a courthouse can be also found in the study area.

Recreational Facilities, Parks and Open Spaces

There are several recreational facilities, parks and open spaces in the study area. There are two playgrounds along the east side of Jerome Avenue overlook the Cross Bronx Expressway. Another park/playground exists on 175th Street, between Macombs Road and Grand Avenue. One playground exists in the residential neighborhood along the southern corner of Rockwood Street and Walton Avenue, another park with a playground, handball court and a basketball court is located at the corner of Macombs Road and Goble Place, known as "Goble Playground". A small park with benches can be found next to a residential building and car parts lot, near Macombs Road/Featherbed Lane intersection and the Cross Bronx Expressway.

Vacant Land

There are no large vacant lots in the study area.

3.3 Future Developments

The following are planned developments in the study area:

Business Improvement Districts (BID)

Davidson Community Center working with Mount Hope Housing Company and others, to establish a Business Improvement District (BID), on Burnside Avenue. The BID will revitalize the existing shopping district. Due to the constant lack of variety of goods and services, this prompts local residents to travel outside of the area to shop in other locations within the borough and the city. Similar to other developed commercial strips in the Bronx, this target area with predominant discount stores and retails has no major fast food chain restaurants to satisfy needs of residents, therefore, the plan is to bring these kinds of services to the area. (build year?)

Morris Heights Health Center

The Morris Heights Health Center (MHHC) is a community oriented facility, not-for-profit institution, serves the Morris Heights area of the Bronx for over 20 years. Terjesen Associates (since 1985), designed numerous facilities for the area including the first neighborhood health center, a 10,000 sq. ft. facility, at 70 West Burnside Avenue. Currently, the company is working on a new project “Harrison Circle”, mixed use, 107,000 sq. ft. facility to be located across from their original site at 85 West Burnside Avenue. Other projects include:

- The Morris Heights Health Center at 70 W. Burnside Ave,
- A 30,000 sq. ft. Family Health Center at 85 W. Burnside Avenue,.
- A 12,000 sq. ft. Family Health Center at Walton Ave,
- An 8,000 sq. ft. Birthing Center at 70 W. Burnside Ave,
- Dental Center expansion at 85 West Burnside Avenue,
- Satellite school clinics in the south Bronx area,
- WIC office at 85 West Burnside Avenue.
- Harrison Circle, a mixed use complex (construction began in the fall of 2007).

Morris Heights Health Center (MHHC)

“Morris Heights Health Center” was built on an abandoned lot on the corner of Harrison Avenue and West Burnside Avenue and completed in 2010.



MHHC under construction (2009)



MHHC completed (2010)

Mount Hope's New Community Center

Mount Hope Housing Company is newly constructed community center (opened in June 2009).

The center is located on 55 East 175th Street at Walton Avenue and serves up to 2,000 people at day. Additional a gymnasium facility is planned to build alongside center.



Mount Hope's Community Center

Kips Bay Boys and Girls Club

Kips Bay Boys and Girls Club renovated the former Hebrew Institute building at 1835 Dr. Martin Luther King Jr. Boulevard in Morris Heights. The new community center is located in completely renovated city-owned building that had been vacant for last 20 years. Work began in May 2009 and is completed in March 2010. The club includes a gym, auditorium and performance space, and a game room. The goal to build this club was to enhance health, educational and recreation opportunities for kids in Morris Heights. The new community center

by partnering with other community organizations such as The Frederic & Margaret Coudert Clubhouse already operating nearby will reach many young people and have a lasting impact on their lives.

Davidson Community Center

Development of “Davidson Community Center” to provide community services to the area. The construction site of the Community Center is located on north-west corner of West Burnside Avenue and Davidson Avenue. Photo below shows this facility under construction (2009).



“Davidson Community Center”

The Community Center consists of two furnished floors, divided up into offices and two activity areas. There are community plans to acquire an additional floor to accommodate the increased demand for activities, services and information. Renovations on the first floor are completed and the office is now in use. The partially renovated basement accommodates the "Dress for Success" program.

West Tremont Development

There is a newly constructed public school on the southeast corner of West Tremont Avenue at University Avenue/MLK Boulevard with limited parking (10-15 spaces) for faculty members located behind the building. On the ground floor there are four new stores: America’s 99-cent, public laundromat, pizzeria, and a nail salon. Photos below show the new facility.



West Tremont Development

Burnside and Morris Avenues Residential Development

Near East Burnside Avenue at Morris Avenue two new high-rise residential buildings were constructed (see photos below).



University Heights Secondary School

In March 2010, the city's Panel for Educational Policy voted to approve University Heights Secondary School's move to the South Bronx High School campus. Local developer Frank DeLeonardis asked the city to consider his four-story building on Jerome Avenue at East 179th Street, which is just six or seven blocks from BCC where the school is currently housed, but this is to be approved by various parties including local officials and community boards.

4.0 TRAFFIC AND TRANSPORTATION

4.1 Introduction

The Jerome Avenue study area is bounded by 181st Street to the north, 172nd Street to the south, Grand Concourse to the east and Macombs Road and University Avenue/Dr. Martin Luther King Jr Boulevard to the west. Several major corridors (Jerome Avenue, Grand Concourse, University Avenue/Dr. Martin Luther King, Burnside Avenue, and Tremont Avenue) process significant vehicular volumes during rush hours. The Cross Bronx Expressway (CBE), a major east-west corridor with significant through traffic has two exit and two entrance ramps at Jerome Avenue that adds to the congestion. The CBE is below grade and divides the neighborhood, creating limited north-south connections in the study area. Figure 4.1 shows the study area network.

4.2 Street System

The study area can be accessed from the CBE (I-95), Grand Concourse Boulevard, and the Major Deegan Expressway (I-87). The following are major corridors in the study area:

Jerome Avenue is a main north/south corridor in the study area with an elevated subway line (No. 4). It serves as the major arterial providing access to the Cross Bronx Expressway (I-95) in the southern part of the study area. It is approximately 60 feet wide with two moving lanes per direction and parking on both sides. It also bear columns that support the subway elevated structure. Jerome Avenue between 172nd and 181st Streets is predominantly commercial with auto related activities (body shops), fast food chains, and various small retail stores. The four entrance/exit ramps from/to the CBE, located between Mount Eden Avenue and Clifford Place, made Jerome Avenue one of the most congested corridors in the study area. Jerome Avenue acts as a divider between east and west streets.

Grand Concourse, another major north/south corridor, is approximately 140 feet wide with mainline and service roads separated by raised medians. The typical lane configuration on the mainline is two through lanes and one exclusive left turn lane in the northbound and southbound directions. The service roads have one travel lane and one parking lane for direction.

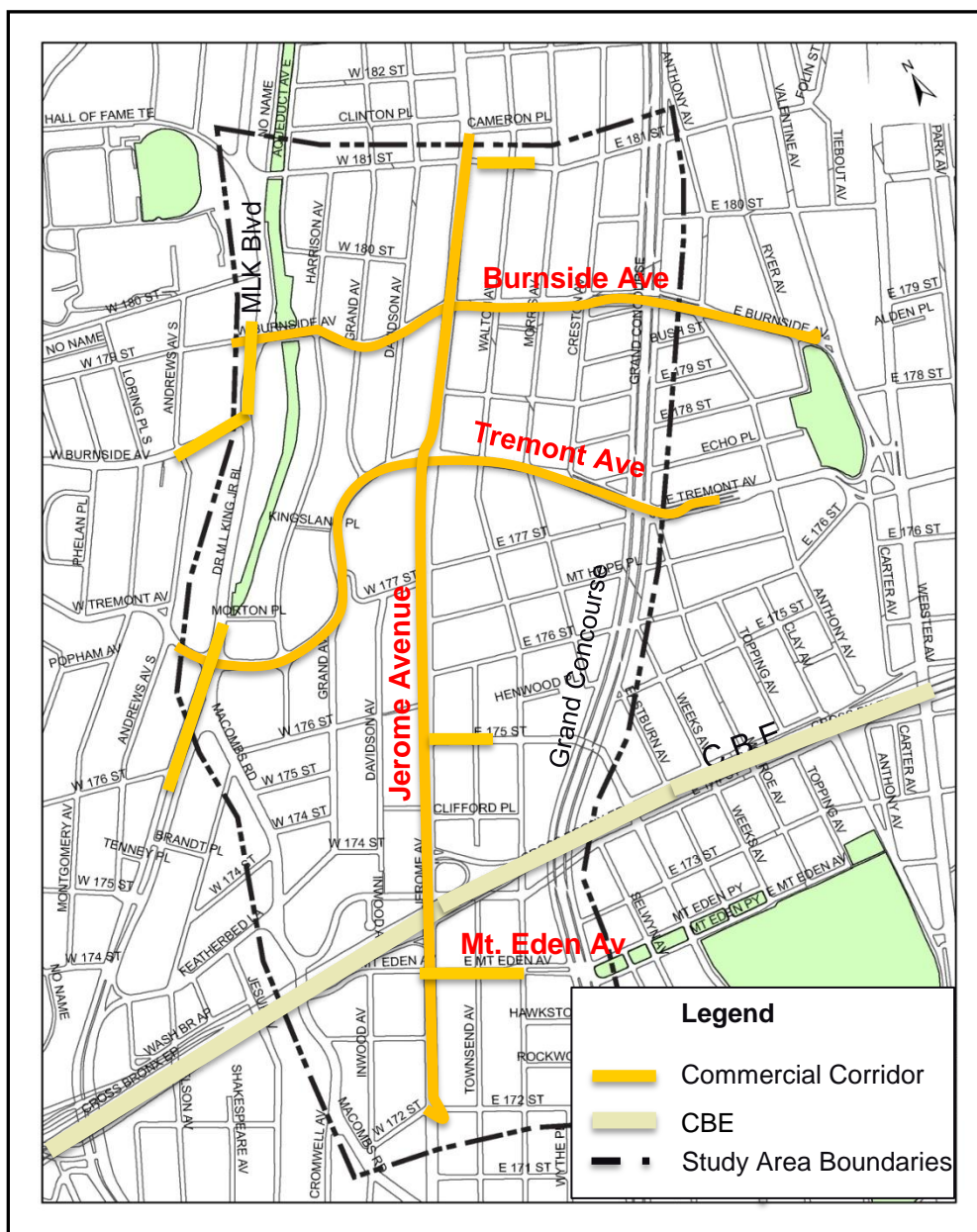
Burnside Avenue is an east/west corridor in the northern part of the study area. It is approximately 50 feet wide with one travel lane and a parking lane in each direction. It provides direct access to the WB Major Deegan Expressway. Burnside Avenue, between University

Avenue/Dr. Martin Luther King Jr Boulevard and Grand Concourse, is a mixture of residential and commercial retail activities.

Tremont Avenue, another east/west corridor, is approximately 50 feet wide with one travel lane and one parking lane per direction.

Figure 4.1 shows main commercial corridors in the study area.

Figure 4.1
Major Commercial Corridors



4.3 Data Collection and Traffic Operations

The traffic data collection plan includes Automatic Traffic Recorders (ATR), manual turning movements, vehicle classification counts (auto, bikes, trucks, and buses), and pedestrian counts for one midweek day (Tuesday or Wednesday or Thursday) during the AM, midday, PM, and Saturday midday peak hours. Other data for conducting HCS analysis such as bus stops, parking, roadway geometry, and signal timing were collected for capacity analysis at 32 locations, as follows:

1. Jerome Avenue & 172nd Street;
2. Jerome Avenue & Mount Eden Avenue;
3. Jerome Avenue & Featherbed Lane/174th Street;
4. Jerome Avenue & 175th Street;
5. Jerome Avenue & 176th Street;
6. Jerome Avenue & 177th Street;
7. Jerome Avenue & Tremont Avenue;
8. Jerome Avenue & Burnside Avenue;
9. Jerome Avenue & 181st Street;
10. Townsend Avenue & E. 174th Street;
11. Townsend Avenue & E. Mount Eden Avenue;
12. Walton Avenue & E. 174th Street;
13. Walton Avenue & E. 176th Street;
14. Walton Avenue & E. Mount Eden Avenue;
15. Macombs Road & Grand Avenue;
16. Macombs Road & Featherbed Lane;
17. Macombs Road/Inwood Avenue & W. 172nd Street;
18. University Avenue/Dr. MLK Blvd & W. Tremont Avenue;
19. University Avenue/Dr. MLK Blvd & W. 179th Street/Burnside Avenue;
20. University Avenue Dr. MLK Blvd / & W. Burnside Avenue;
21. University Avenue/Dr. MLK Blvd & W. 181st Street/Hall of Fame Terrace;
22. W. Tremont Avenue & Grand Avenue;
23. W. Burnside Avenue & Grand Avenue;
24. W. Burnside Avenue & Davidson Avenue;
25. E. Tremont Avenue & Creston Avenue;

26. E. Tremont Avenue & Grand Concourse;
27. E. Burnside Avenue & Walton Avenue;
28. E. Burnside Avenue & Morris Avenue;
29. E. Burnside Avenue & Creston Avenue;
30. E. Burnside Avenue & Grand Concourse;
31. E. 181st Street & Morris Avenue; and
32. E. 181st Street & Grand Concourse.

Pedestrian counts were conducted one midweek day during the AM, midday, PM peaks, and Saturday midday peak hours for twenty four locations. Figure 4.2 shows all locations where traffic counts were conducted.

4.4 Network Traffic Volumes

Balanced traffic network volumes were prepared for each peak period. See Figures 4.3 to 4.6. The Grand Concourse southbound Service Road between East Burnside Avenue and East 180th Street with 1,342 vehicles in the AM peak hour and Jerome Avenue southbound between Featherbed Lane and Cross Bronx Expressway exit/entrance ramps with 1280, 1304, and 1195 vehicles in the midday, PM, and Saturday midday peak hours, respectively, recorded the highest volumes.

**Figure 4-3
Existing Traffic Volumes
AM Peak Hour**

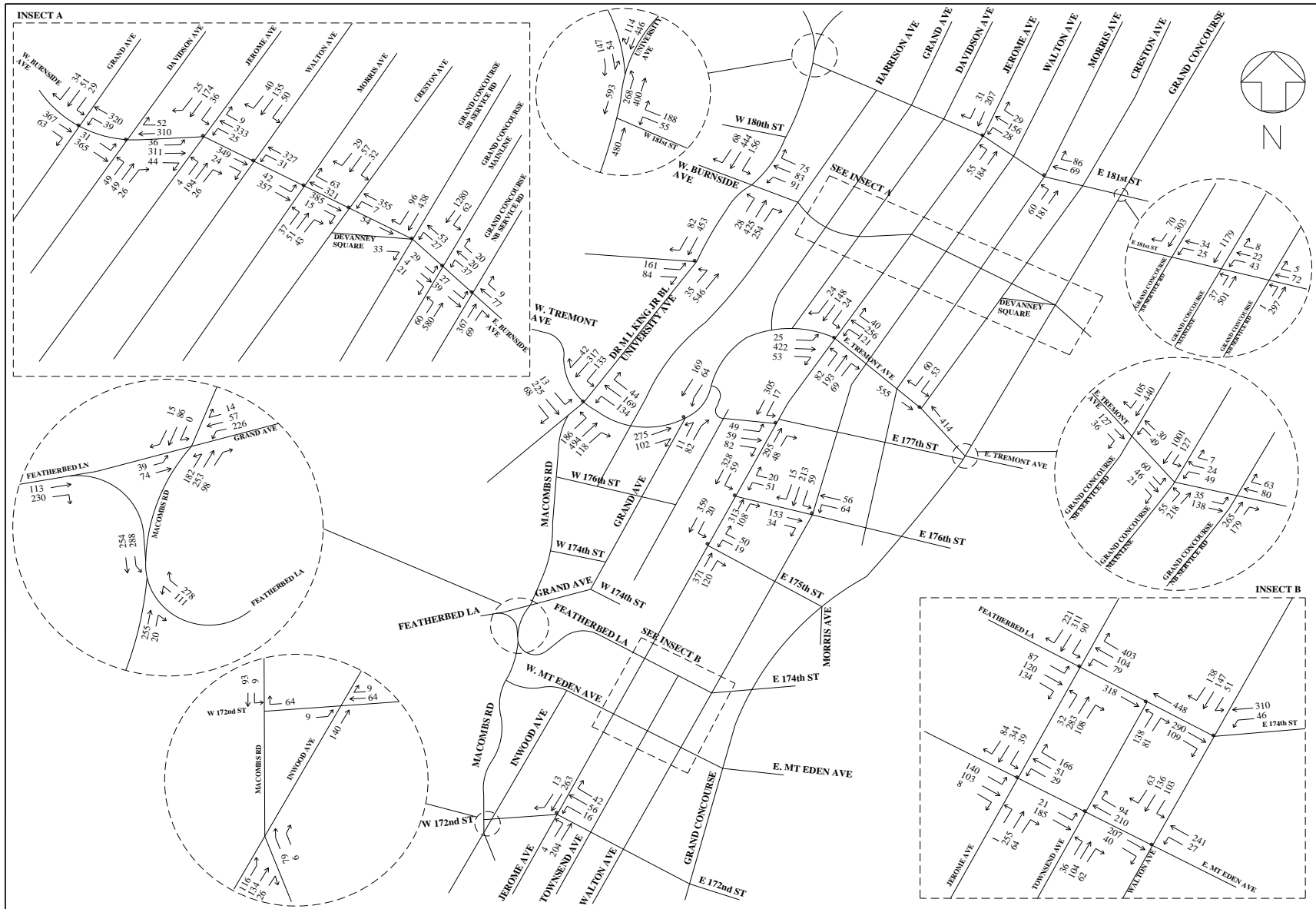
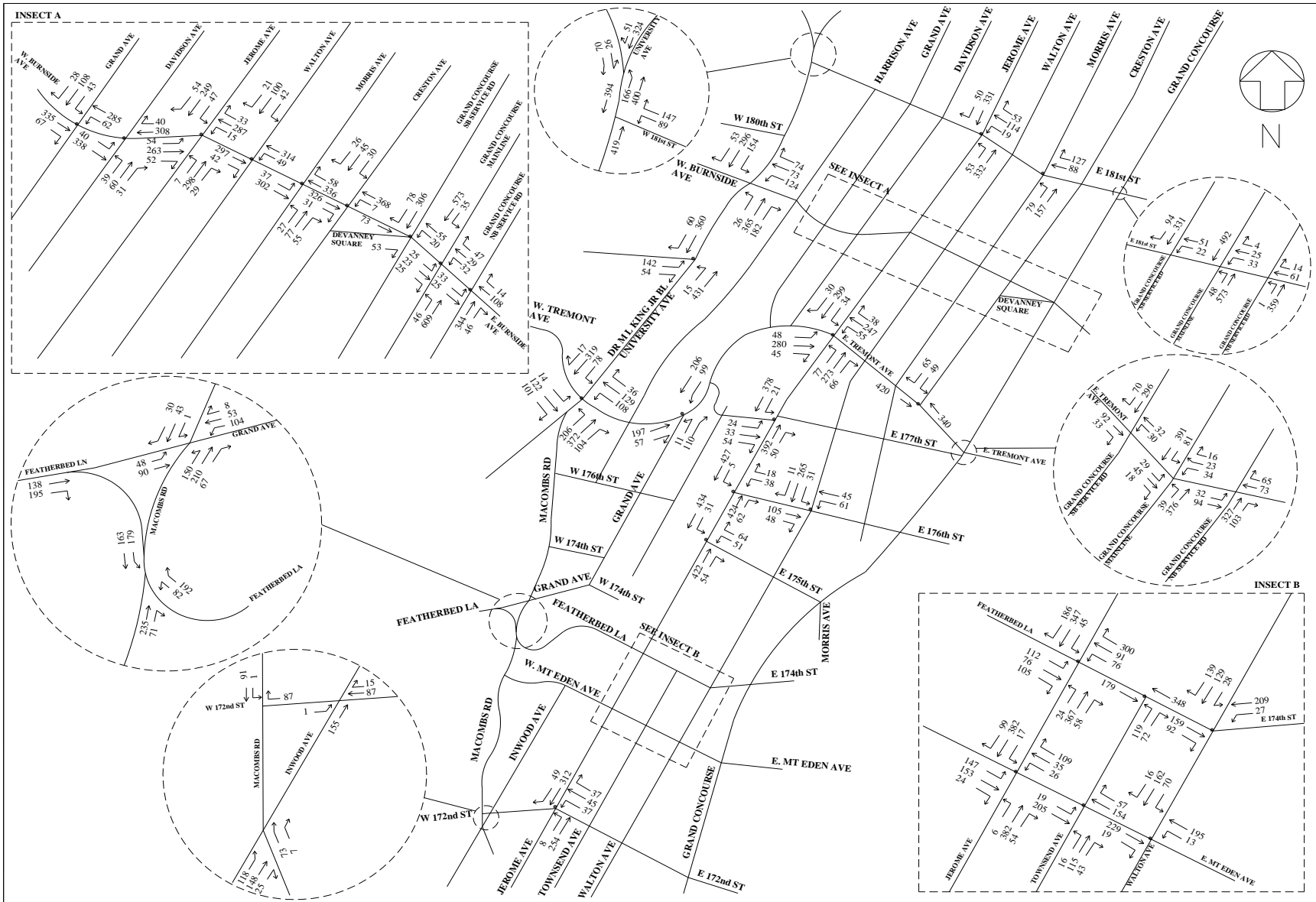


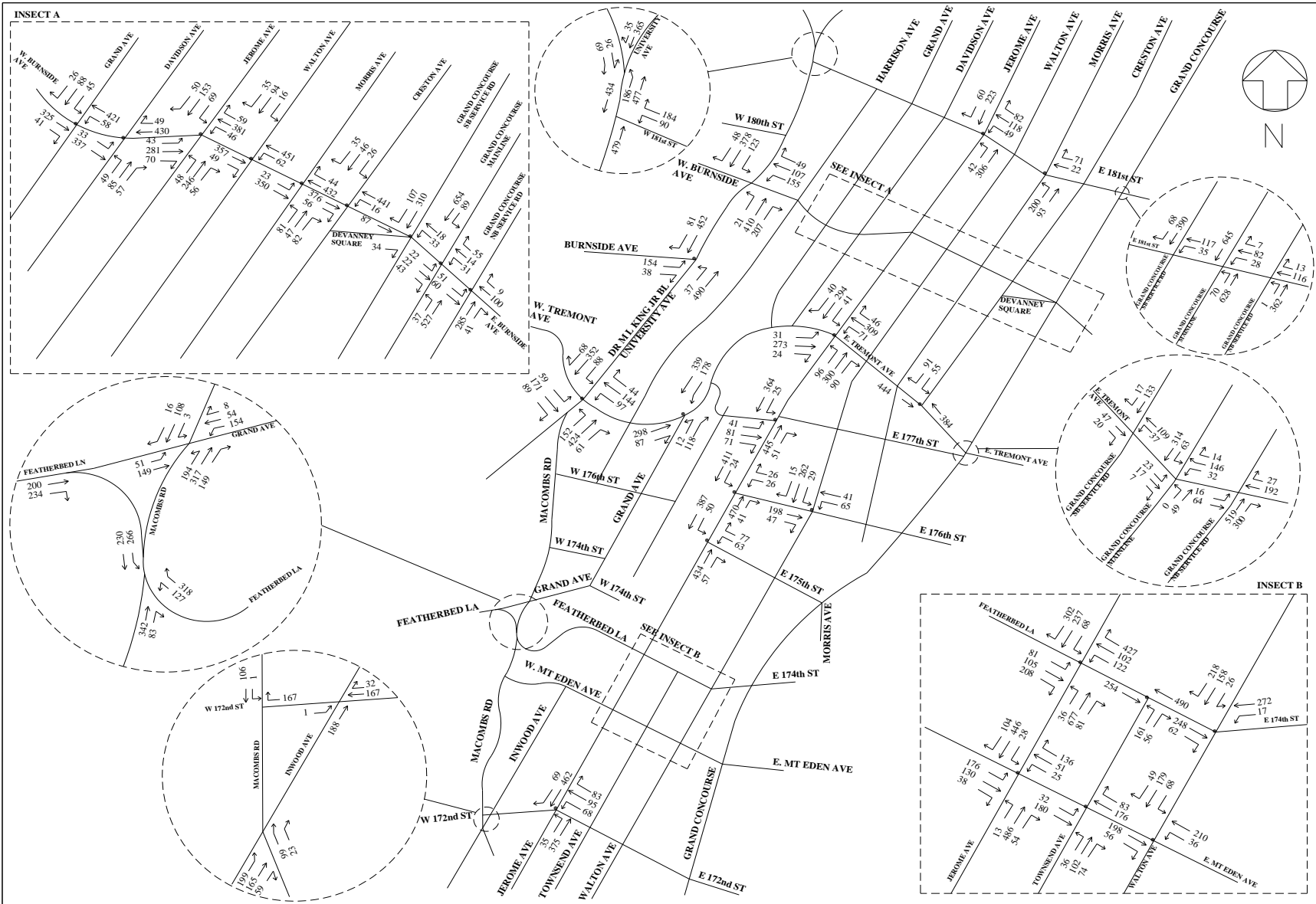
Figure 4-4
Existing Traffic Volumes
Midday Peak Hour



**Figure 4-5
Existing Traffic Volumes
PM Peak Hour**



Figure 4-6 Existing Traffic Volumes Saturday Midday Peak Hour



4.5 Street Capacity and Level of Service (LOS)

The capacity of the roadways is the maximum rate of flow which may pass through a section of roadway under prevailing traffic, signalization and roadway conditions. The capacity of a roadway is determined by several factors including turning movements, signal timing, geometric design of the intersection, pedestrian movements, type of vehicle, illegal and/or double parking, grade, and roadway and weather conditions. In determining street capacity within the study area, the 2000 HCM methodology was used. The methodology requires the use of official signal timings, street geometry, and other relevant roadway and traffic information for performing capacity (LOS) analysis.

The traffic flow characteristics are measured in terms of the volume-to-capacity (v/c) ratios and delays. The quality of the flow is expressed in terms of LOS, which is based on an average delay experienced by a vehicle. Delay is a measure of driver discomfort, frustration, fuel consumption, and lost travel time. When the v/c ratio exceeds 1.0, a facility or intersection operates at or over capacity. In this situation severe congestion occurs in traffic with stop-and-start conditions, and extensive vehicle queuing and delays. Volume-to-capacity ratios of less than 0.85 are considered to be reflective of acceptable traffic conditions, with average delays of 45 seconds or less. Table 4-1 shows the level of service criteria as specified in the 2000 HCM Methodology.

Table 4-1: Level of Service Criteria for Signalized Intersections

Level of Service (LOS)	Control Delay Per Vehicle	Description of Traffic Condition
A	≤ 10.0	Describes operations with very low control delay, up to 10 seconds per vehicle. This level of service occurs when progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.
B	10.1 to 20.0	Describes operations with control delay greater than 10 and up to 20 sec. per vehicle. This level generally occurs with good progression, short cycle lengths, or both. More vehicles stop than with LOS A, causing higher levels of average delay.
C	20.1 to 35.0	Describes operations with control delay greater than 20 and up to 35 sec. per vehicle. These higher delays may result from fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear at this level. The number of vehicles stopping is significant at this level, though many still pass through the intersection without stopping.
D	35.1 to 55.0	Describes operations with control delay greater than 35 and up to 55 sec. per vehicle. At level D, the influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high v/c ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.
E	55.1 to 80.0	Describes operations with control delay greater than 55 and up to 80 sec. per vehicle. This level of service is considered by many agencies to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high v/c ratios. Individual cycle failures are frequent occurrences.
F	> 80	Describes operations with control delay in excess of 80 sec. per vehicle. This level, considered to be unacceptable to most drivers, often occurs with oversaturation, that is, when arrival flow rates exceed the capacity of the intersection. It may also occur at high v/c ratios below 1.0 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing factor to such delay levels.

Sources: Highway Capacity Manual, Transportation Research Board,
National Research Council, Washington, D.C. 2000.
New York City Department of Transportation
New York State Department of Transportation

4.6 Existing Traffic Conditions

The HCS+ and 2000 Highway Capacity Manual (HCM) analyses show the volume-to-capacity (v/c) ratios, vehicular delay, and level-of-service (LOS). See Table 4-2.

Most intersections operated at an acceptable level of service (LOS) C or better during the various peak hours. However, some intersections experienced LOS D, E and F for some approaches or all lane groups during certain peak hours. Intersections with approaches or lane groups with mid LOS D (equal or higher than 45 seconds per vehicle) are listed below and shown in Figures 4-7 to 4-10.

- Jerome Avenue and Mount Eden Avenue (AM, midday, PM, and Saturday midday);
- Jerome Avenue and Featherbed Lane/East 174th Street (AM, Midday, PM, and Saturday Midday);
- Jerome Avenue and Burnside Avenue (midday, PM, and Saturday midday);
- Walton Avenue and East 174th Street (AM and PM);
- Walton Avenue and East Mount Eden Avenue (AM and PM);
- Macombs Road and Grand Avenue (AM and PM);
- Macombs Road and Featherbed Lane (PM);
- Grand Avenue and West Tremont Avenue (PM);
- Dr. Martin Luther King Blvd/University Avenue and West Tremont Avenue (midday and PM);
- Dr. Martin Luther King Blvd/University Avenue and W. Burnside Avenue/W. 179th Street (PM);
- Dr. Martin Luther King Blvd/University Avenue and W. Burnside Avenue (AM, midday, PM, and Saturday midday); and
- Dr. Martin Luther King Blvd/University Avenue and W. 181st Street/Hall of Fame Terrace (AM, PM, and Saturday midday).

TABLE 4-2 (page 1 of 4)
Traffic Capacity Analysis for Signalized Intersections
Existing Conditions

Intersection	Approach	Lane Group	AM			Midday			PM			Saturday MD		
			V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
Jerome Avenue & E. 172nd Street	NB	LT	0.20	10.8	B	0.24	11.2	B	0.36	12.4	B	0.41	12.9	B
	SB	TR	0.25	11.2	B	0.32	11.9	B	0.33	11.9	B	0.49	13.9	B
	WB	LTR	0.27	22.6	C	0.35	23.8	C	0.62	30.0	C	0.64	30.7	C
	Overall			13.2	B		13.9	B		16.7	B		17.1	B
Jerome & Mt. Eden Avenues	NB	LTR	0.29	11.6	B	0.68	17.7	B	0.47	13.6	B	0.72	18.5	B
	SB	LTR	0.43	13.3	B	1.05	89.6	F	0.39	12.7	B	0.93	33.5	C
	EB	LTR	1.05	96.7	F	1.05	90.6	F	1.05	85.6	F	1.05	87.7	F
	WB	LTR	0.88	50.9	D	0.88	53.4	D	0.71	35.8	D	0.95	61.3	E
	Overall			36.8	C		34.4	C		34.5	C		40.0	D
Jerome Avenue & Featherbed Lane/ 174th Street	NB	LTR	0.48	14.1	B	0.42	13.2	B	0.35	12.2	B	0.64	16.6	B
	SB	LTR	0.80	23.0	C	0.59	16.0	B	0.62	16.6	B	0.63	17.1	B
	EB	LTR	1.05	97.2	F	0.99	97.1	F	0.97	96.8	F	0.86	44.2	D
	WB	LTR	0.98	62.4	E	0.97	54.9	D	1.00	61.7	E	1.04	74.2	E
	Overall			46.5	D		33.2	D		38.0	D		36.4	D
Jerome Avenue & 175th Street	NB	TR	0.45	13.4	B	0.41	12.9	B	0.39	12.6	B	0.37	12.3	B
	SB	LT	0.34	12.3	B	0.44	13.5	B	0.42	13.2	B	0.38	12.7	B
	WB	L	0.07	20.1	C	0.19	21.7	C	0.21	21.8	C	0.19	21.5	C
		R	0.25	22.8	C	0.33	24.2	C	0.35	24.4	C	0.27	23.1	C
	Overall			13.9	B		14.7	B		14.7	B		14.1	B
Jerome Avenue & 176th Street	NB	TR	0.37	12.5	B	0.40	12.9	B	0.43	13.1	B	0.45	13.4	B
	SB	LT	0.48	14.3	B	0.44	13.3	B	0.37	12.5	B	0.38	12.6	B
	WB	LR	0.29	23.2	C	0.21	22.0	C	0.26	22.7	C	0.21	22.0	C
	Overall			14.5	B		13.7	B		13.7	B		13.6	B
Jerome Avenue & 177th Street	NB	T	0.31	10.8	B	0.33	11.0	B	0.37	11.3	B	0.37	11.3	B
	SB	T	0.27	10.4	B	0.34	11.1	B	0.28	10.5	B	0.25	10.3	B
	EB	LR	0.62	32.1	C	0.37	26.1	C	0.55	29.8	C	0.68	35.0	C
	Overall			15.7	B		13.0	B		14.6	B		16.5	B
Jerome & Tremont Avenues	NB	LTR	0.54	25.7	C	0.66	29.3	C	0.70	30.3	C	0.71	31.2	C
	SB	LTR	0.28	20.9	C	0.48	24.2	C	0.41	22.9	C	0.56	26.5	C
	EB	LTR	0.57	25.9	C	0.48	24.3	C	0.72	30.7	C	0.35	21.9	C
	WB	DefL	0.81	53.1	D									
		LTR				0.46	24.1	C	0.59	26.8	C	0.54	25.5	C
	Overall			28.9	C		25.7	C		28.2	C		26.7	C
Jerome & Burnside Avenues	NB	LTR	0.51	26.1	C	0.70	32.9	C	0.81	39.2	D	0.80	39.9	D
	SB	LTR	0.56	28.0	C	0.89	49.5	D	0.81	42.6	D	0.85	48.3	D
	EB	LTR	0.76	35.8	D	0.98	68.9	E	0.97	64.2	E	0.91	52.6	D
	WB	LTR	0.86	43.1	D	0.82	39.8	D	0.95	57.5	E	1.03	78.2	E
	Overall			35.0	D		47.8	D		51.9	D		57.4	E
Jerome Avenue & 181st Street	NB	LT	0.27	14.4	B	0.42	16.4	B	0.25	14.1	B	0.34	15.1	B
	SB	TR	0.25	14.0	B	0.37	15.5	B	0.19	13.4	B	0.23	13.8	B
	WB	LTR	0.58	35.8	D	0.47	32.6	C	0.50	33.4	C	0.62	37.5	D
	Overall			21.1	C		19.3	B		19.9	B		21.3	C

TABLE 4-2 (page 2 of 4)
Traffic Capacity Analysis for Signalized Intersections
Existing Conditions

Intersection	Approach	Lane Group	AM			Midday			PM			Saturday MD		
			V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
Townsend Avenue & E. 174th Street	NB	LR	0.57	29.5	C	0.53	28.2	C	0.64	31.5	C	0.58	29.6	C
	EB	TR	0.46	14.4	B	0.25	11.7	B	0.37	13.1	B	0.33	12.6	B
	WB	LT	0.59	16.9	B	0.45	14.4	B	0.71	20.2	C	0.57	16.4	B
	Overall			18.9	B		17.6	B		21.1	C		18.6	B
Townsend & E. Mt. Eden Avenues	NB	LTR	0.46	23.2	C	0.46	23.2	C	0.62	27.2	C	0.48	23.9	C
	EB	LT	0.42	17.1	B	0.53	19.3	B	0.51	18.9	B	0.44	17.6	B
	WB	TR	0.74	27.5	C	0.54	19.8	B	0.61	21.7	C	0.61	21.5	C
	Overall			23.4	C		20.6	C		22.8	C		21.1	C
Walton Avenue & E. 174th Street	SB	LTR	0.64	13.9	B	0.51	11.6	B	0.51	11.4	B	0.63	13.9	B
	EB	TR	1.03	68.7	E	0.59	22.1	C	0.88	38.6	D	0.70	25.4	C
	WB	LT	1.05	78.0	E	0.73	28.3	C	1.05	77.8	E	0.77	30.0	C
	Overall			53.1	D		20.0	B		44.1	D		22.1	C
Walton Avenue & E. 176th Street	SB	LTR	0.45	10.5	B	0.51	11.5	B	0.48	10.9	B	0.50	11.2	B
	EB	TR	0.53	21.0	C	0.49	20.1	C	0.55	21.6	C	0.83	36.6	D
	WB	LT	0.58	24.1	C	0.40	19.3	B	0.57	24.1	C	0.58	26.6	C
	Overall			16.7	B		15.4	B		16.9	B		23.2	C
Walton & E. Mt. Eden Avenue	SB	LTR	0.97	66.1	E	0.72	35.6	D	1.05	85.0	F	0.84	44.2	D
	EB	TR	0.36	13.1	B	0.36	13.0	B	0.50	15.3	B	0.37	13.2	B
	WB	LT	0.48	15.0	B	0.34	12.9	B	0.44	14.4	B	0.41	13.8	B
	Overall			33.8	C		21.3	C		44.0	D		25.4	C
Macombs Road & Grand Avenue/ Featherbed Lane	NB	LTR	0.81	21.4	C	0.61	14.6	B	0.86	23.6	C	0.79	19.6	B
	SB	LTR	0.11	8.7	A	0.09	8.7	A	0.11	8.7	A	0.17	9.1	A
	EB	LT	0.26	14.0	B	0.33	14.9	B	0.61	20.1	C	0.44	16.5	B
	WB	LTR	0.99	69.1	E	0.66	25.1	C	1.00	72.7	E	0.81	35.4	D
	Overall			31.8	C		16.3	B		30.2	C		20.6	C
Macombs Road & Featherbed Lane	NB	TR	0.27	9.8	A	0.33	10.3	B	0.50	12.0	B	0.37	10.7	B
	SB	DefL	0.84	32.6	C	0.73	24.6	C	1.02	72.6	E	0.85	35.5	D
		T	0.46	12.8	B	0.32	11.0	B	0.49	13.3	B	0.41	12.2	B
	WB	L	0.20	13.1	B	0.14	12.6	B	0.23	13.4	B	0.24	13.6	B
Overall			17.9	B		14.6	B		23.9	C		17.7	B	
Macombs Road/ Inwood Avenue & W. 172nd Street	NB	LTR	0.33	12.9	B	0.38	13.5	B	0.53	15.2	B	0.53	15.4	B
	EB	LT	0.13	9.2	A	0.10	9.10	A	0.13	9.2	A	0.11	9.1	A
	WB	TR	0.10	9.0	A	0.09	9.00	A	0.11	9.1	A	0.12	9.1	A
	Overall			11.3	B		11.7	B		13.0	B		13.1	B
University & W. Tremont Avenues	NB	L	0.77	47.8	D	0.87	61.2	E	1.04	96.3	F	0.71	44.9	D
		TR	0.75	33.8	C	0.58	28.8	C	0.87	42.0	D	0.55	27.6	C
	SB	L	0.80	53.1	D	0.39	28.0	C	0.95	96.3	F	0.48	32.7	C
		TR	0.33	23.6	C	0.28	22.8	C	0.36	24.1	C	0.36	24.0	C
	EB	LTR	0.77	43.3	D	0.57	33.7	C	0.76	42.3	D	0.87	52.9	D
	WB	DefL	0.41	33.2	C	0.32	27.9	C	0.35	31.8	C	0.30	31.0	C
		TR	0.40	21.5	C	0.31	20.0	B	0.39	21.2	C	0.29	19.5	B
Overall			40.8	D		30.8	C		46.2	D		32.7	C	

TABLE 4-2 (page 3 of 4)
Traffic Capacity Analysis for Signalized Intersections
Existing Conditions

Intersection	Approach	Lane Group	AM			Midday			PM			Saturday MD		
			V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
University & Burnside Avenues	NB	LT	0.86	40.0	D	0.57	27.1	C	1.05	77.3	E	0.73	31.7	C
	SB	TR	0.69	30.2	C	0.57	27.1	C	0.77	33.0	C	0.66	29.0	C
	EB	LR	0.85	53.2	D	0.82	53.8	D	0.86	57.3	E	0.74	45.2	D
	Overall			42.2	D		32.8	C		57.2	E		32.7	C
University & W. Burnside Avenues/ W.179 th Street	NB	LTR	0.57	9.1	A	0.42	7.3	A	0.73	12.2	B	0.45	7.5	A
	SB	LTR/Defl L	0.69	12	B	0.67	11.7	B	0.88	45.1	D	0.49	8.3	A
	WB	TR							0.67	12.3	B			
	Overall	LTR	0.94	71.7	E	0.94	73.4	E	1.04	88.3	F	0.07	75.0	E
University Avenue & W. 181st Street	NB	T	0.45	23.9	C	0.50	24.9	C	0.68	29.3	C	0.51	25.1	C
	SB	T	0.38	8.0	A	0.27	7.0	A	0.34	7.6	A	0.29	7.2	A
	WB	L	0.40	45.6	D	0.36	44.8	D	0.44	46.9	D	0.29	42.9	D
	Overall	R	0.84	77.2	E	0.61	53.5	D	0.86	75.6	E	0.78	65.8	E
University Avenue & Hall of Fame Terrace	NB	L	0.59	23.4	C	0.33	10.7	B	0.59	22.8	C	0.41	13.1	B
	SB	T	0.23	6.7	A	0.30	7.2	A	0.34	7.5	A	0.28	7.1	A
	EB	TR	0.57	26.6	C	0.39	23.1	C	0.54	25.8	C	0.43	23.6	C
	Overall	LR	0.89	79.8	E	0.54	50.8	D	0.86	76.6	E	0.47	48.1	D
Grand & W. Tremont Avenues	NB	LR	0.44	41.7	D	0.60	48.0	D	0.88	71.4	E	0.48	43.0	D
	EB	TR	0.34	9.5	A	0.19	8.3	A	0.31	9.3	A	0.26	8.8	A
	WB	DefL	0.29	10.5	B				0.44	13.0	B	0.46	13.1	B
	Overall	LT				0.30	9.3	A						
Creston & E. Tremont Avenues	NB	T	0.84	77.2	E	0.61	53.5	D	0.86	75.6	E	0.78	65.8	E
	Overall			25.2	C		24.7	C		28.2	C		25.2	C
	SB	L	0.59	23.4	C	0.33	10.7	B	0.59	22.8	C	0.41	13.1	B
	Overall	T	0.23	6.7	A	0.30	7.2	A	0.34	7.5	A	0.28	7.1	A
Grand Concourse SB Service Road & E. Tremont Avenue	NB	TR	0.53	21.5	C	0.38	21.1	C	0.43	19.5	B	0.29	19.9	B
	EB	TR	0.68	48.2	D	0.45	37.4	D	0.77	53.7	D	0.48	38.1	D
	WB	LT	0.24	24.5	C	0.16	20.7	C	0.44	28.2	C	0.28	22.3	C
	Overall			28.5	C		25.4	C		31.1	C		25.6	C
Grand Concourse mainline & E. Tremont Avenue	NB	L	0.28	30.3	C	0.13	14.1	B	0.31	18.2	B	0.00	13.3	B
	SB	T	0.19	16.3	B	0.29	19.7	B	0.45	19.8	B	0.04	17.0	B
	WB	L	0.24	10.3	B	0.20	13.3	B	0.42	20.3	C	0.21	11.4	B
	EB	T	0.80	28.7	C	0.41	21.4	C	0.48	20.3	C	0.45	22.2	C
	WB	LTR	0.59	45.1	D	0.33	34.6	C	0.70	52.7	D	0.39	36.7	D
	Overall	LTR	0.33	38.0	D	0.27	33.5	C	0.65	47.3	D	0.65	43.2	D
Grand Concourse NB Service Road & E. Tremont Avenue	NB	TR	0.65	24.2	C	0.52	23.7	C	0.61	23.0	C	0.84	34.6	C
	EB	LT	0.51	29.6	C	0.28	22.4	C	0.66	36.5	D	0.44	25.6	C
	WB	TR	0.59	44.8	D	0.56	40.6	D	0.75	53.5	D	0.66	43.7	D
	Overall			28.9	C		27.3	C		31.4	C		34.9	C

TABLE 4-2 (page 4 of 4)
Traffic Capacity Analysis for Signalized Intersections
Existing Conditions

Intersection	Approach	Lane Group	AM			Midday			PM			Saturday MD		
			V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
W. Burnside & Grand Avenues	SB	LTR	0.33	24.0	C	0.55	29.1	C	0.72	35.0	C	0.47	26.8	C
	EB	TR	0.88	33.3	C	0.72	22.1	C	0.70	20.9	C	0.67	19.9	B
	WB	LT	0.79	26.3	C	0.67	20.6	C	0.83	28.1	C	0.85	30.4	C
	Overall			29.5	C		23.1	C		27.1	C		25.7	C
W. Burnside & Davidson Avenues	NB	LTR	0.40	25.1	C	0.40	25.4	C	0.50	27.1	C	0.53	28.0	C
	EB	LT	0.63	18.6	B	0.65	19.5	B	0.66	19.4	B	0.59	17.5	B
	WB	TR	0.56	16.6	B	0.55	16.6	B	0.68	19.9	B	0.71	20.8	C
	Overall			19.0	B		19.4	B		21.1	C		21.2	C
E. Burnside & Walton Avenues	SB	LTR	0.79	42.9	D	0.58	33.3	C	0.68	37.3	D	0.50	30.9	C
	EB	TR	0.49	12.5	B	0.48	12.7	B	0.58	14.3	B	0.62	15.6	B
	WB	LT	0.51	13.1	B	0.63	16.0	B	0.77	21.0	C	0.88	30.0	C
	Overall			21.2	C		18.6	B		21.9	C		25.0	C
E. Burnside & Morris Avenues	NB	LTR	0.45	26.2	C	0.51	27.8	C	0.74	36.4	D	0.75	37.8	D
	EB	LT	0.67	20.1	C	0.61	18.3	B	0.86	30.6	C	0.65	19.5	B
	WB	TR	0.63	18.3	B	0.67	19.8	B	0.92	37.7	D	0.79	24.8	C
	Overall			20.4	C		20.9	C		34.8	C		26.1	C
E. Burnside & Creston Avenues	SB	LTR	0.67	41.9	D	0.58	39.0	D	0.68	43.3	D	0.42	32.8	C
	EB	TR	0.52	10.9	B	0.47	10.3	B	0.66	13.9	B	0.54	11.3	B
	WB	LT	0.49	10.4	B	0.55	11.5	B	0.60	12.4	B	0.60	12.4	B
	Overall			16.4	B		15.2	B		17.7	B		14.4	B
Grand Concourse SB Service Road & E. Burnside Avenue	SB	TR	0.54	21.7	C	0.40	21.4	C	0.53	21.4	C	0.48	22.7	C
	EB	T	0.54	44.2	D	0.37	35.7	D	0.35	38.0	D	0.36	35.3	D
	WB	LT	0.21	23.7	C	0.16	20.6	C	0.19	23.4	C	0.14	20.4	C
	Overall			25.8	C		24.2	C		24.2	C		24.8	C
Grand Concourse mainline & E. Burnside Avenue	NB	L	0.37	46.2	D	0.14	15.4	B	0.32	22.3	C	0.13	16.6	B
		T	0.44	19.6	B	0.45	22.1	C	0.73	26.2	C	0.48	22.6	C
	SB	L	0.21	14.7	B	0.15	15.6	B	0.37	31.3	C	0.32	20.4	C
		T	0.99	52.5	D	0.44	21.9	C	0.59	22.5	C	0.51	23.0	C
	EB	LTR	0.23	35.9	D	0.32	34.6	C	0.31	37.4	D	0.28	33.7	C
	WB	LTR	0.36	38.7	D	0.44	37.2	D	0.38	39.1	D	0.36	35.7	D
Grand Concourse NB Service Road & E. Burnside Avenue	Overall			51.0	D		24.2	C		26.1	C		24.2	C
	NB	TR	0.45	19.9	B	0.37	20.9	C	0.54	21.7	C	0.32	20.3	C
	EB	LT	0.32	25.8	C	0.17	20.7	C	0.22	23.9	C	0.26	22.1	C
	WB	TR	0.49	42.6	D	0.41	36.5	D	0.48	41.3	D	0.43	37.3	D
E. 181st Street & Morris Avenue	Overall			25.0	C		24.7	C		25.5	C		24.6	C
	NB	LT	0.27	12.1	B	0.27	12.1	B	0.44	13.8	B	0.36	13.0	B
Grand Concourse SB Service Road & E. 181st Street	WB	TR	0.51	16.3	B	0.46	15.4	B	0.64	19.9	B	0.32	13.4	B
	Overall			14.2	B		13.7	B		16.3	B		13.1	B
Grand Concourse mainline & E. 181st Street	SB	TR	0.37	16.4	B	0.37	16.5	B	0.41	17.1	B	0.43	17.3	B
	WB	LT	0.13	25.7	C	0.17	26.3	C	0.36	29.2	C	0.32	28.5	C
	Overall			17.6	B		18.0	B		20.4	C		20.1	C
	NB	L	0.53	38.5	D	0.23	16.1	B	0.65	34.6	C	0.35	19.2	B
Grand Concourse NB Service Road & E. 181st Street		T	0.35	16.1	B	0.38	16.5	B	0.84	28.6	C	0.41	16.9	B
	SB	T	0.79	26.0	C	0.33	15.9	B	0.50	18.3	B	0.44	17.4	B
	WB	LTR	0.15	26.0	C	0.15	25.9	C	0.32	28.5	C	0.26	27.5	C
	Overall			23.5	C		16.9	B		25.6	C		18.3	B
Grand Concourse NB Service Road & E. 181st Street	NB	LT	0.23	14.8	B	0.26	15.1	B	0.42	17.2	B	0.28	15.3	B
	WB	TR	0.18	26.4	C	0.19	26.7	C	0.36	29.4	C	0.31	28.5	C
	Overall			17.3	B		17.6	B		20.2	C		19.4	B

Figure 4-7
Existing Conditions – Intersections with LOS D, E, and F
AM Peak Hour

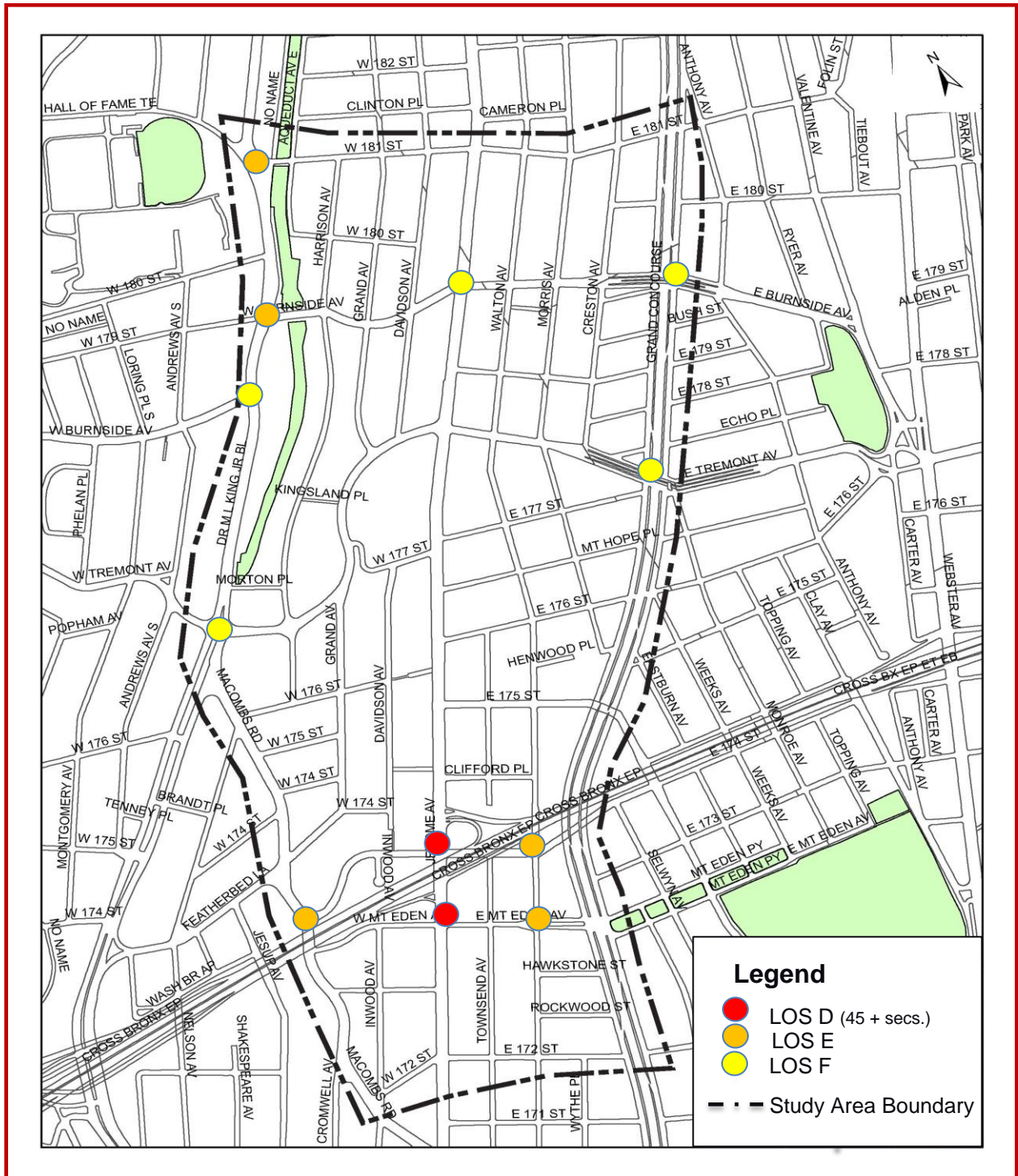


Figure 4-8
Existing Conditions – Intersections with LOS D, E, and F
Midday Peak Hour

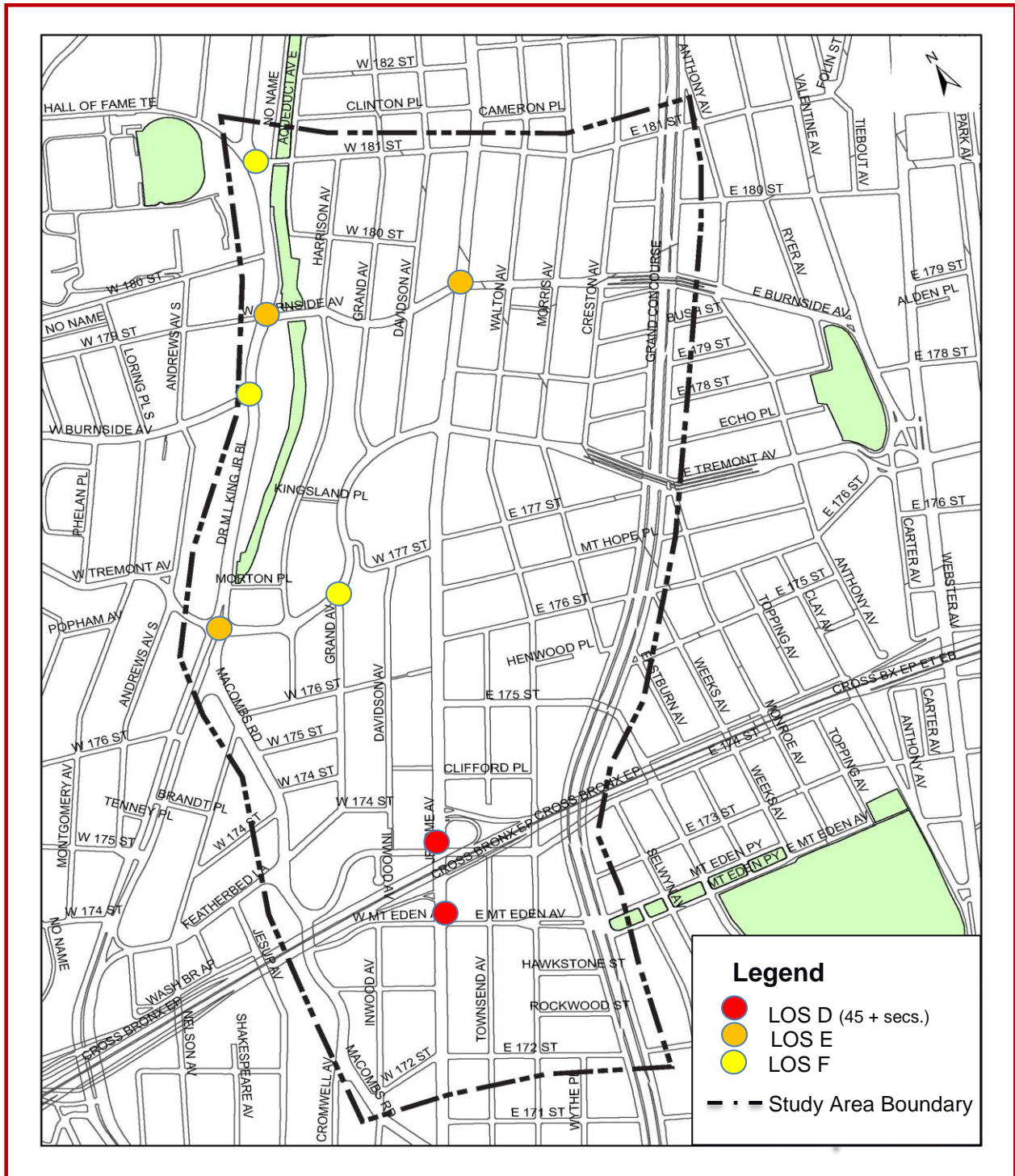


Figure 4-9
Existing Conditions – Intersections with LOS D, E, and F
PM Peak Hour

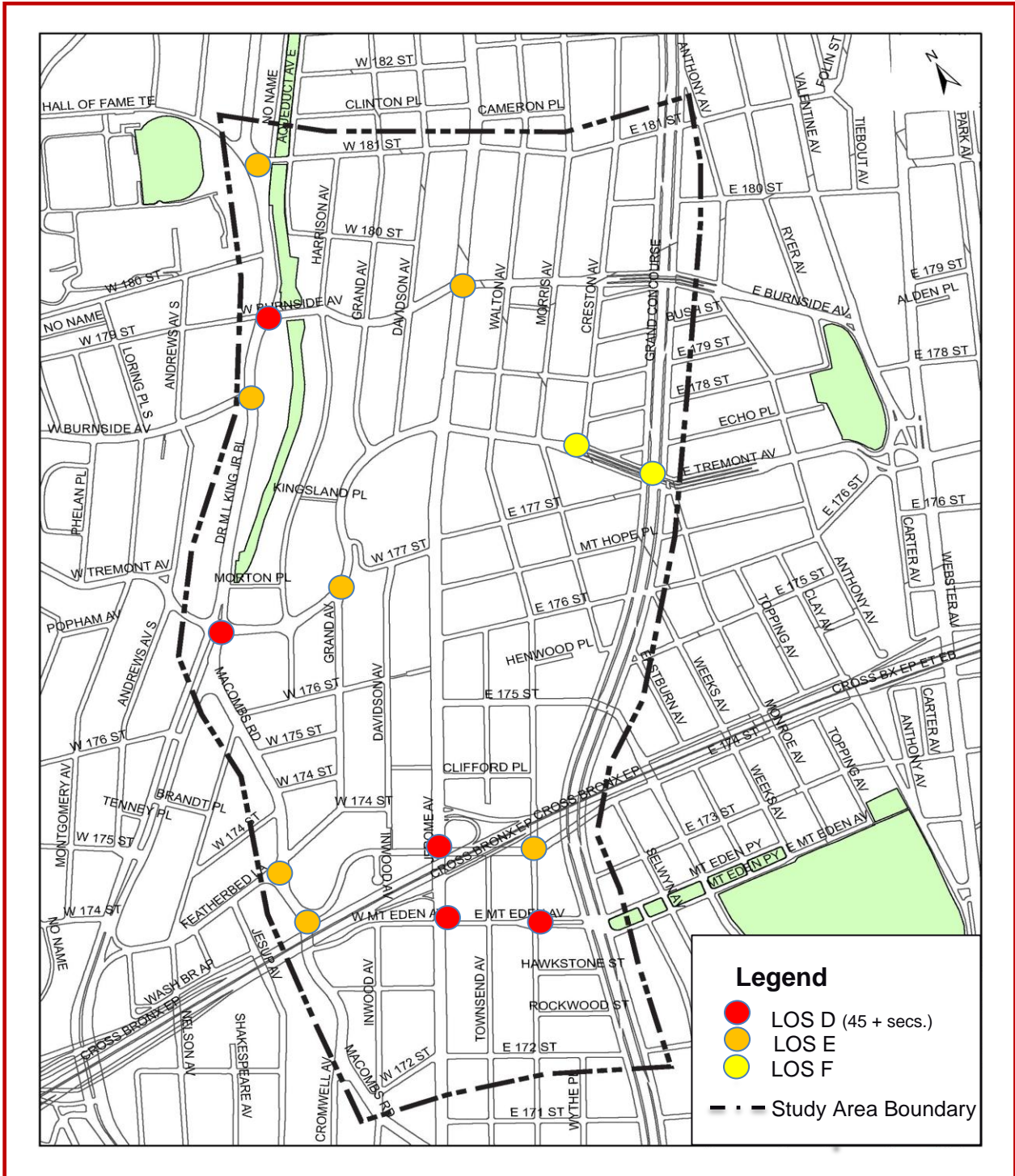
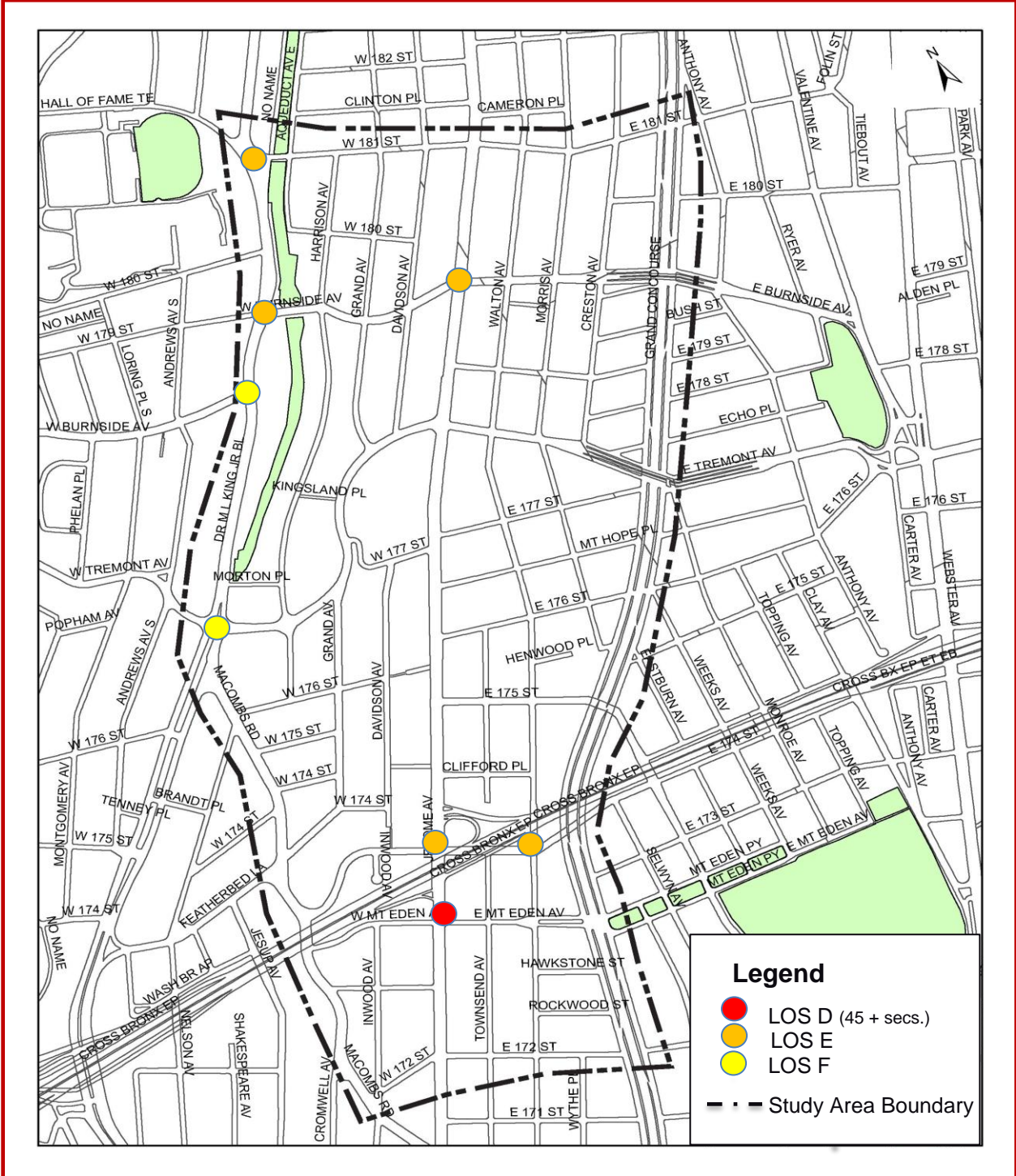


Figure 4-10
Existing Conditions – Intersections with LOS D, E, and F
Saturday Midday Peak Hour



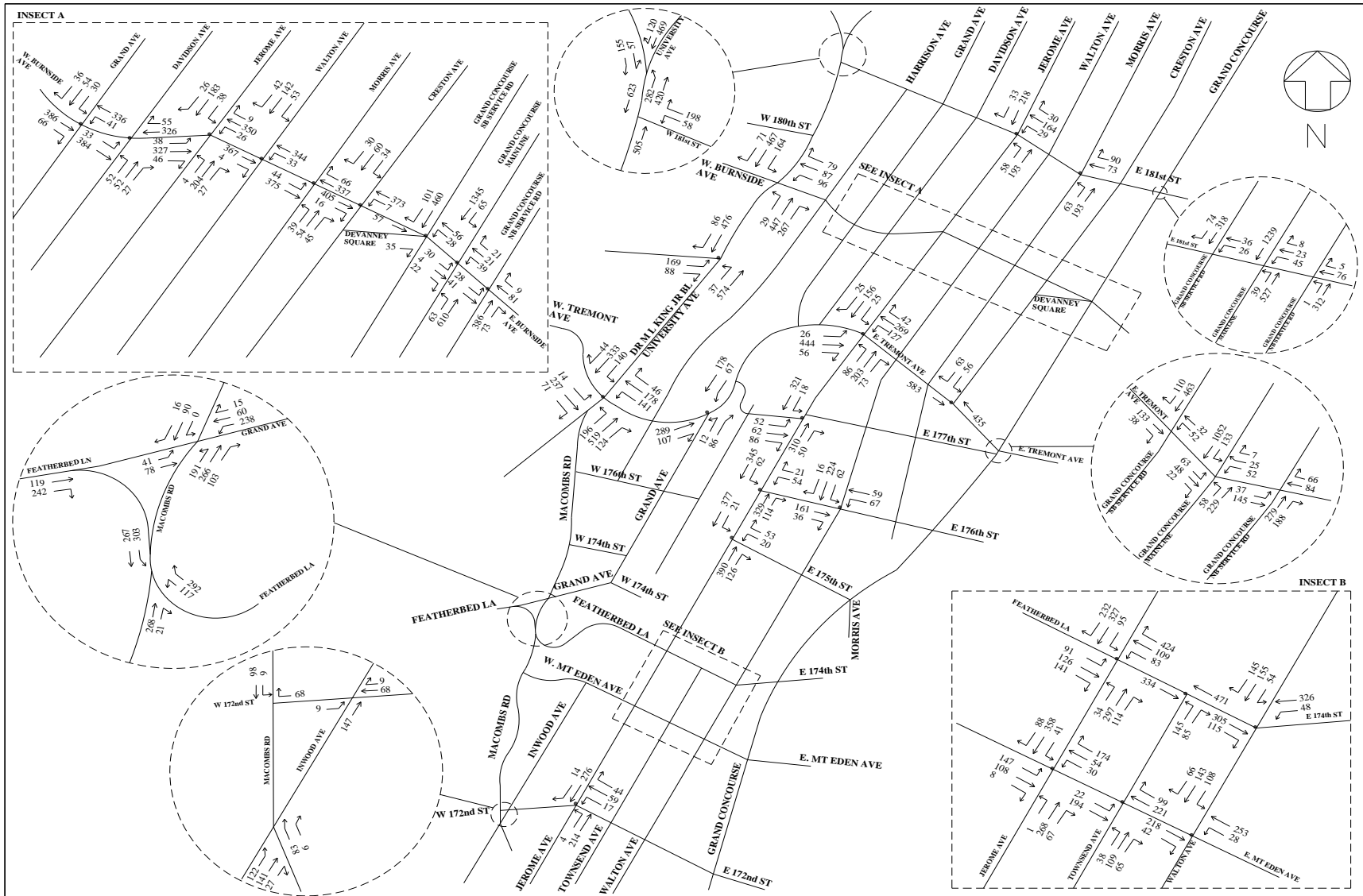
4.7 Future Traffic Conditions

The 2018 future traffic conditions focused on capacity analysis of 32 intersections. The existing volumes were projected 0.38% per year for period of ten years, plus trips from new known developments by year 2018. Thus, future balanced traffic network volumes were developed for the weekday AM, midday, PM, and Saturday midday peak hours (see Figures 4-11 to 4-14). Table 4-3 shows the future conditions capacity analysis results.

The results show that most intersections would operate at an acceptable level of service (LOS) C or better during the various peak hours. However, some intersection approaches or lane groups would experience LOS D, E, and F. Intersections with approaches or lane groups with mid LOS D or worse are listed below and shown in Figures 4-15 to 4-18.

- Jerome Avenue and Mount Eden Avenue (AM, midday, PM, & Saturday midday);
- Jerome Avenue and Featherbed Lane/East 174th Street (AM, midday, PM, and Saturday midday);
- Jerome Avenue and Burnside Avenue (Midday, PM, and Saturday midday);
- Walton Avenue and East 174th Street (AM and PM);
- Walton Avenue and East Mount Eden Avenue (AM and PM);
- Macombs Road and Grand Avenue (AM and PM);
- Macombs Road and Featherbed Lane (PM);
- Grand Avenue and West Tremont Avenue (PM);
- Dr. Martin Luther King Jr Boulevard/University Avenue and West Tremont Avenue (Midday and PM);
- Dr. Martin Luther King Jr Boulevard/University Avenue and Burnside Avenue (PM);
- University Avenue/Dr. Martin Luther King Jr Boulevard/ and W. Burnside Avenue (AM, Midday, PM, and Saturday Midday); and
- Dr. Martin Luther King Jr Boulevard/University Avenue and W. 181st Street/Hall of Fame Terrace.

Figure 4-11
Future Traffic Volumes
AM Peak Hour



**Figure 4-12
Future Traffic Volumes
Midday Peak Hour**



Figure 4-13
Future Traffic Volumes
PM Peak Hour



Figure 4-14
Future Traffic Volumes
Saturday Midday Peak Hour

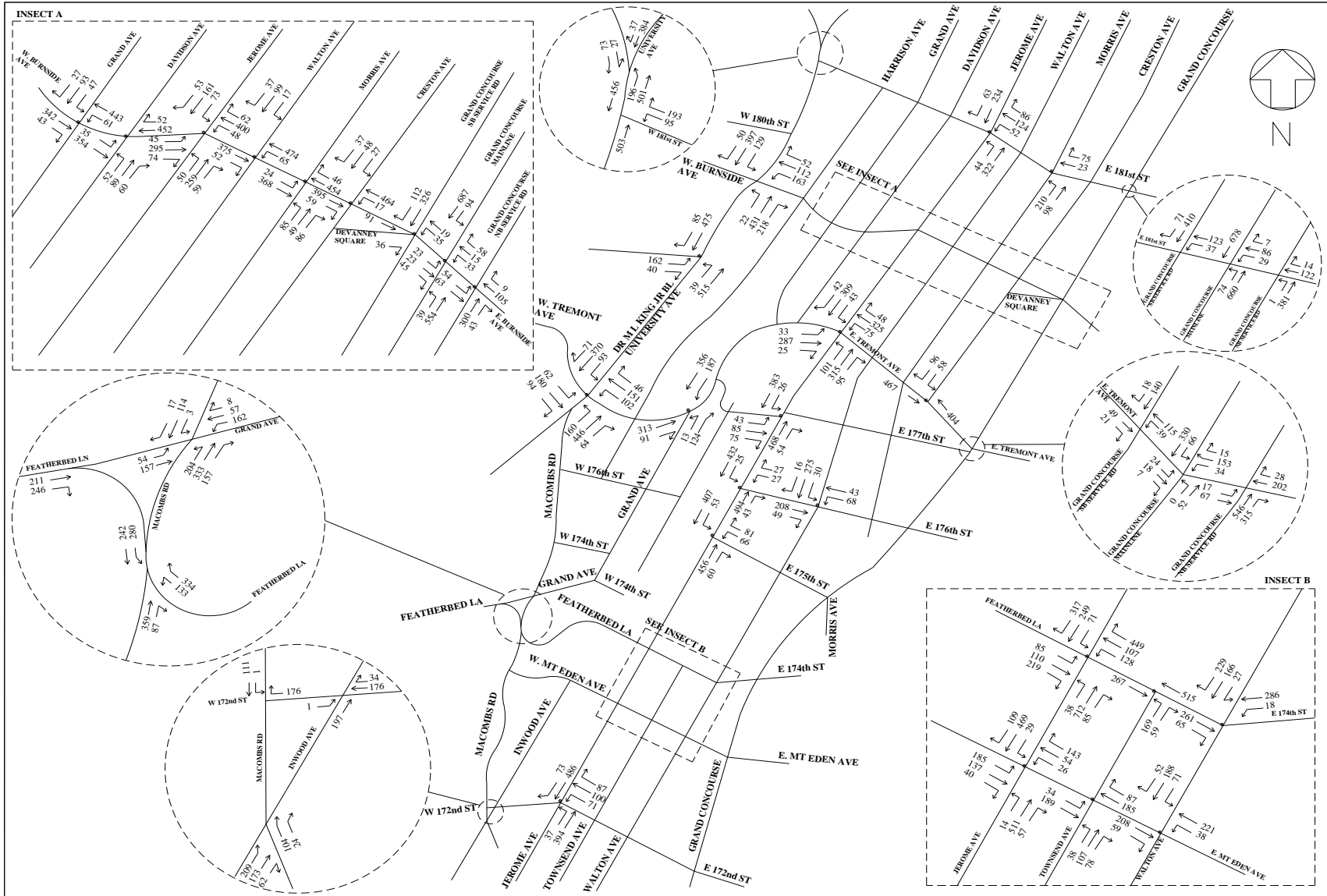


TABLE 4-3 (page 1 of 4)
Traffic Capacity Analysis for Signalized Intersections
Future Conditions

Intersection	Approach	Lane Group	AM			Midday			PM			Saturday MD		
			V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
Jerome Avenue & E. 172nd Street	NB	LT	0.21	10.9	B	0.26	11.3	B	0.38	12.6	B	0.43	13.3	B
	SB	TR	0.27	11.4	B	0.33	12.1	B	0.34	12.1	B	0.52	14.3	B
	WB	LTR	0.29	22.8	C	0.36	24.0	C	0.65	31.0	C	0.66	31.5	C
	Overall			13.3	B		14.1	B		17.1	B		17.5	B
Jerome & Mt. Eden Avenues	NB	LTR	0.30	11.7	B	0.71	18.7	B	0.49	13.9	B	0.76	19.9	B
	SB	LTR	0.46	13.6	B	0.80	21.8	C	0.41	12.9	B	0.99	45.1	D
	EB	LTR	1.10	110.9	F	1.11	108.4	F	1.11	103.1	F	1.06	92.2	F
	WB	LTR	0.92	57.8	E	0.93	62.1	E	0.75	38.6	D	0.98	68.1	E
	Overall			41.0	D		39.3	D		39.5	D		46.1	D
Jerome Avenue & Featherbed Lane/ 174th Street	NB	LTR	0.51	14.5	B	0.45	13.5	B	0.37	12.4	B	0.67	17.4	B
	SB	LTR	0.86	27.1	C	0.63	16.8	B	0.66	17.5	B	0.68	18.5	B
	EB	DefL				0.98	98.6	F	0.98	101.9	F			
		LT/LTR	1.09	98.7	F	0.64	33.3	C	0.83	44.1	D	0.87	45.1	D
	WB	LTR	1.00	63.4	E	0.96	56.2	E	1.01	62.8	E	1.08	88.0	F
Overall			47.8	D		33.4	D		39.1	D		40.6	D	
Jerome Avenue & 175th Street	NB	TR	0.47	13.7	B	0.43	13.1	B	0.39	12.6	B	0.38	12.6	B
	SB	LT	0.36	12.5	B	0.47	13.9	B	0.45	13.5	B	0.41	13.1	B
	WB	L	0.08	20.2	C	0.21	21.9	C	0.22	22.0	C	0.19	21.6	C
		R	0.27	23.1	C	0.34	24.5	C	0.37	24.8	C	0.28	23.3	C
Overall			14.2	B		15.0	B		15.0	B		14.3	B	
Jerome Avenue & 176th Street	NB	TR	0.39	12.8	B	0.42	13.1	B	0.45	13.4	B	0.47	13.7	B
	SB	LT	0.52	14.8	B	0.46	13.6	B	0.39	12.7	B	0.40	12.8	B
	WB	LR	0.31	23.4	C	0.22	22.2	C	0.27	22.9	C	0.21	22.1	C
	Overall			14.9	B		14.0	B		13.9	B		13.9	B
Jerome Avenue & 177th Street	NB	T	0.32	10.9	B	0.35	11.2	B	0.39	11.5	B	0.38	11.5	B
	SB	T	0.29	10.6	B	0.35	11.2	B	0.29	10.6	B	0.27	10.4	B
	EB	LR	0.63	32.4	C	0.38	26.3	C	0.56	30.1	C	0.70	35.6	D
	Overall			15.9	B		13.2	B		14.8	B		16.7	B
Jerome & Tremont Avenues	NB	LTR	0.57	26.5	C	0.71	31.2	C	0.74	32.3	C	0.75	33.4	C
	SB	LTR	0.29	21.1	C	0.51	24.9	C	0.44	23.3	C	0.61	27.7	C
	EB	LTR	0.60	26.6	C	0.51	24.8	C	0.78	33.3	C	0.37	22.2	C
	WB	DefL	0.81	54.0	D									
		LTR				0.49	24.7	C	0.64	28.4	C	0.58	26.3	C
	Overall			29.5	C		26.7	C		30.0	C		27.9	C
Jerome & Burnside Avenues	NB	LTR	0.53	26.7	C	0.73	34.5	C	0.85	42.9	D	0.85	44.0	D
	SB	LTR	0.59	29.1	C	0.91	53.1	D	0.88	50.6	D	0.88	53.4	D
	EB	LTR	0.80	38.9	D	1.00	75.2	E	0.99	67.9	E	0.98	65.9	E
	WB	LTR	0.90	48.7	D	0.87	44.4	D	0.98	63.0	E	1.08	92.8	F
	Overall			38.2	D		51.7	D		56.7	E		67.5	E
Jerome Avenue & 181st Street	NB	LT	0.29	14.6	B	0.45	16.9	B	0.42	16.4	B	0.36	15.4	B
	SB	TR	0.26	14.1	B	0.39	15.8	B	0.30	14.6	B	0.24	13.9	B
	WB	LTR	0.60	36.4	D	0.49	33.1	C	0.75	43.0	D	0.65	38.4	D
	Overall			21.4	C		19.7	B		23.7	C		21.7	C

TABLE 4-3 (page 2 of 4)
Traffic Capacity Analysis for Signalized Intersections
Future Conditions

Intersection	Approach	Lane Group	AM			Midday			PM			Saturday MD		
			V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
Townsend Avenue & E. 174th Street	NB	LR	0.60	30.4	C	0.56	29.0	C	0.67	32.6	C	0.61	30.6	C
	EB	TR	0.48	14.8	B	0.26	11.8	B	0.39	13.4	B	0.35	12.8	B
	WB	LT	0.62	17.6	B	0.48	14.8	B	0.75	21.6	C	0.60	17.0	B
	Overall			19.5	B		18.1	B		22.1	C		19.2	B
Townsend & E. Mt. Eden Avenues	NB	LTR	0.47	23.4	C	0.48	23.6	C	0.64	28.1	C	0.50	24.2	C
	EB	LT	0.44	17.5	B	0.56	20.0	C	0.54	19.6	B	0.47	18.1	B
	WB	TR	0.78	30.1	C	0.57	20.7	C	0.64	22.9	C	0.64	22.6	C
	Overall			24.8	C		21.3	C		23.7	C		21.8	C
Walton Avenue & E. 174th Street	SB	LTR	0.67	14.9	B	0.53	12.0	B	0.53	11.8	B	0.66	14.7	B
	EB	TR	1.05	76.1	E	0.63	23.0	C	0.93	45.1	D	0.74	27.2	C
	WB	LT	1.07	83.7	F	0.78	32.0	C	1.07	83.6	F	0.84	36.0	D
	Overall			57.2	E		21.6	C		48.1	D		24.7	C
Walton Avenue & E. 176th Street	SB	LTR	0.47	10.8	B	0.54	11.9	B	0.50	11.2	B	0.52	11.6	B
	EB	TR	0.56	21.7	C	0.51	20.6	C	0.58	22.3	C	0.87	41.1	D
	WB	LT	0.63	26.8	C	0.44	20.2	C	0.62	26.5	C	0.63	29.9	C
	Overall			17.7	B		15.9	B		17.7	B		25.6	C
Walton & E. Mt. Eden Avenue	SB	LTR	0.98	68.4	E	0.72	35.4	D	1.07	90.9	F	0.86	45.7	D
	EB	TR	0.38	13.4	B	0.38	13.3	B	0.52	15.9	B	0.39	13.5	B
	WB	LT	0.51	15.5	B	0.36	13.2	B	0.47	14.9	B	0.43	14.1	B
	Overall			32.0	C		21.4	C		51.7	D		26.1	C
Macombs Road & Grand Avenue/ Featherbed Lane	NB	LTR	0.86	24.4	C	0.64	15.3	B	0.91	27.8	C	0.83	21.9	C
	SB	LTR	0.12	8.80	A	0.10	8.70	A	0.11	8.80	A	0.18	9.20	A
	EB	LT	0.28	14.2	B	0.35	15.1	B	0.64	20.9	C	0.47	16.9	B
	WB	LTR	1.01	70.9	E	0.69	26.5	C	1.02	77.5	E	0.86	41.4	D
	Overall			33.2	C		17.0	B		33.2	C		23.0	C
Macombs Road & Featherbed Lane	NB	TR	0.25	8.1	A	0.31	8.5	A	0.49	10.1	B	0.35	8.90	A
	SB	DefL	0.81	26.8	C	0.71	20.7	C	1.04	74.3	E	0.82	29.1	C
		T	0.44	10.6	B	0.31	9.1	A	0.45	10.7	B	0.39	10.1	B
	WB	L	0.24	15.6	B	0.17	14.9	B	0.28	16.0	B	0.29	16.2	B
	Overall			15.3	B		12.6	B		24.6	C		15.3	B
Macombs Road/ Inwood Avenue & W. 172nd Street	NB	LTR	0.34	13.0	B	0.39	13.6	B	0.52	15.1	B	0.54	15.6	B
	EB	LT	0.14	9.2	A	0.11	9.1	A	0.13	9.2	A	0.12	9.10	A
	WB	TR	0.10	9.0	A	0.10	9.0	A	0.11	9.1	A	0.12	9.20	A
	Overall			11.4	B		11.8	B		13.0	B		13.3	B
University & W. Tremont Avenues	NB	L	0.82	52.8	D	0.88	63.2	E	1.05	98.8	F	0.78	52.1	D
		TR	0.78	34.6	C	0.60	29.0	C	0.91	45.3	D	0.57	28.3	C
	SB	L	0.80	53.3	D	0.42	28.8	C	1.01	115.8	F	0.54	35.7	D
		TR	0.34	23.3	C	0.29	22.5	C	0.37	23.7	C	0.38	24.3	C
	EB	LTR	0.82	47.7	D	0.61	35.3	D	0.81	46.2	D	0.87	52.9	D
	WB	DefL	0.44	35.0	C	0.35	29.2	C	0.38	33.4	C	0.32	32.0	C
		TR	0.43	22.2	C	0.33	20.4	C	0.41	21.8	C	0.31	19.8	B
Overall			36.4	D		31.7	C		48.6	D		35.3	D	

TABLE 4-3 (page 3 of 4)
Traffic Capacity Analysis for Signalized Intersections
Future Conditions

Intersection	Approach	Lane Group	AM			Midday			PM			Saturday MD		
			V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
University & Burnside Avenues	NB	LT	0.93	48.8	D	0.60	27.8	C	1.08	85.8	F	0.79	34.7	C
	SB	TR	0.72	31.4	C	0.60	27.8	C	0.81	35.0	D	0.69	30.0	C
	EB	LR	0.86	54.9	D	0.83	54.4	D	0.91	64.1	E	0.78	48.4	D
	Overall			43.3	D		33.1	C		62.7	E		34.9	C
University & W. Burnside Avenues/ W. 179th Street	NB	LTR	0.61	9.60	A	0.45	7.60	A	0.77	13.50	B	0.47	7.70	A
	SB	DefL							0.97	67.2	E			
		LTR	0.73	13.5	B	0.72	12.9	B				0.53	8.80	A
		TR							0.70	13.3	B			
	WB	LTR	0.96	75.7	E	0.97	77.6	E	1.09	103.8	F	0.98	78.2	E
Overall			21.6	C		22.3	C		35.6	D		22.1	C	
University Avenue & W. 181st Street	NB	T	0.47	24.4	C	0.52	25.5	C	0.71	30.4	C	0.53	25.6	C
	SB	T	0.40	8.10	A	0.28	7.10	A	0.36	7.70	A	0.31	7.3	A
	WB	L	0.39	45.3	D	0.38	45.2	D	0.46	47.6	D	0.32	43.5	D
		R	0.87	79.6	E	0.62	54.5	D	0.87	77.6	E	0.79	67.5	E
Overall			25.8	C		23.6	C		28.7	C		25.6	C	
University Avenue & Hall of Fame Terrace	NB	L	0.63	26.3	C	0.35	11.4	B	0.63	25.7	C	0.43	14.2	B
		T	0.24	6.80	A	0.31	7.40	A	0.36	7.70	A	0.30	7.20	A
	SB	TR	0.60	27.3	C	0.42	23.5	C	0.57	26.4	C	0.45	24.0	C
	EB	LR	0.90	82.6	F	0.56	52.1	D	0.88	78.1	E	0.50	49.0	D
Overall			28.9	C		17.9	B		25.6	C		18.0	B	
Grand & W. Tremont Avenues	NB	LR	0.46	42.4	D	0.63	49.8	D	0.90	73.5	E	0.50	43.7	D
	EB	TR	0.35	9.70	A	0.20	8.4	A	0.33	9.40	A	0.27	8.9	A
	WB	DefL	0.31	10.9	B				0.48	14.0	B	0.49	14.1	B
		LT				0.32	9.5	A						
		T	0.22	8.70	A				0.35	10.1	B	0.38	10.5	B
Overall			13.7	B		16.7	B		22.4	C		14.6	B	
Creston & E. Tremont Avenues	SB	LR	0.48	38.6	D	0.49	38.4	D	0.72	48.5	D	0.44	36.7	D
	EB	T	0.35	12.1	B	0.33	12.0	B	0.48	13.9	B	0.26	11.2	B
	WB	T	0.29	11.6	B	0.25	11.2	B	0.29	11.6	B	0.23	11.0	B
	Overall			15.0	B		15.6	B		18.3	B		14.9	B
Grand Concourse SB Service Road & E. Tremont Avenue	SB	TR	0.56	22.0	C	0.40	21.4	C	0.45	19.9	B	0.31	20.1	C
	EB	TR	0.71	49.9	D	0.48	38.1	D	0.78	54.1	D	0.50	38.7	D
	WB	LT	0.26	25.0	C	0.17	20.9	C	0.47	28.9	C	0.30	22.7	C
	Overall			29.3	C		25.8	C		31.2	C		25.9	C
Grand Concourse mainline & E. Tremont Avenue	NB	L	0.30	34.2	C	0.14	14.7	B	0.34	19.7	B	0.01	13.1	B
		T	0.20	16.4	B	0.31	19.9	B	0.48	20.2	C	0.05	17.0	B
	SB	L	0.25	10.6	B	0.21	13.8	B	0.45	22.3	C	0.22	11.5	B
		T	0.84	30.8	C	0.43	21.8	C	0.51	20.7	C	0.48	22.5	C
	EB	LTR	0.63	46.4	D	0.35	35.0	C	0.73	54.8	D	0.42	37.4	D
	WB	LTR	0.35	38.6	D	0.28	33.8	C	0.69	49.3	D	0.68	44.9	D
Overall			29.7	C		22.7	C		27.1	C		24.2	C	
Grand Concourse NB Service Road & E. Tremont Avenue	NB	TR	0.68	25.1	C	0.55	24.3	C	0.64	23.8	C	0.88	38.0	D
	EB	LT	0.55	30.8	C	0.30	22.8	C	0.61	33.8	C	0.47	26.5	C
	WB	TR	0.62	46.1	D	0.58	41.6	D	0.77	54.1	D	0.69	45.0	D
	Overall			30.0	C		27.9	C		32.0	C		37.5	D

TABLE 4-3 (page 4 of 4)
Traffic Capacity Analysis for Signalized Intersections
Future Conditions

Intersection	Approach	Lane Group	AM			Midday			PM			Saturday MD		
			V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	LOS
W. Burnside & Grand Avenues	SB	LTR	0.33	24.0	C	0.55	28.7	C	0.75	36.2	D	0.47	26.6	C
	EB	TR	0.93	39.5	D	0.75	23.6	C	0.74	22.4	C	0.71	21.2	C
	WB	LT	0.86	32.5	C	0.72	22.9	C	0.89	34.8	C	0.92	39.9	D
	Overall			35.0	C		24.4	C		30.6	C		30.4	C
W. Burnside & Davidson Avenues	NB	LTR	0.33	24.0	C	0.55	28.7	C	0.75	36.2	D	0.47	26.6	C
	EB	LT	0.93	39.5	D	0.75	23.6	C	0.74	22.4	C	0.71	21.2	C
	WB	TR	0.86	32.5	C	0.72	22.9	C	0.89	34.8	C	0.92	39.9	D
	Overall			35.0	C		24.4	C		30.6	C		30.4	C
E. Burnside & Walton Avenues	SB	LTR	0.80	43.4	D	0.59	33.3	C	0.67	36.2	D	0.51	31.3	C
	EB	TR	0.47	12.2	B	0.51	13.1	B	0.61	15.0	B	0.65	16.5	B
	WB	LT	0.54	13.6	B	0.67	17.1	B	0.82	24.4	C	0.94	37.1	D
	Overall			21.7	C		19.2	B		23.4	C		28.9	C
E. Burnside & Morris Avenues	NB	LTR	0.46	26.3	C	0.52	28.1	C	0.75	36.6	D	0.72	35.1	D
	EB	LT	0.71	21.5	C	0.64	19.4	B	0.93	39.9	D	0.69	20.7	C
	WB	TR	0.66	19.3	B	0.70	21.0	C	0.97	47.0	D	0.83	27.4	C
	Overall			21.4	C		21.8	C		42.2	D		27.0	C
E. Burnside & Creston Avenues	SB	LTR	0.68	41.9	D	0.58	38.5	D	0.65	40.6	D	0.43	32.9	C
	EB	TR	0.55	11.3	B	0.50	10.7	B	0.69	14.9	B	0.57	11.8	B
	WB	LT	0.52	10.8	B	0.58	12.1	B	0.63	13.2	B	0.63	13.3	B
	Overall			16.8	B		15.6	B		18.1	B		15.0	B
Grand Concourse SB Service Road & E. Burnside Avenue	SB	TR	0.57	22.3	C	0.42	21.7	C	0.56	22.0	C	0.50	23.1	C
	EB	T	0.57	45.3	D	0.39	36.2	D	0.37	38.4	D	0.38	35.7	D
	WB	LT	0.22	23.9	C	0.17	20.7	C	0.20	23.6	C	0.15	20.6	C
	Overall			26.5	C		24.5	C		24.6	C		25.2	C
Grand Concourse mainline & E. Burnside Avenue	NB	L	0.39	45.9	D	0.16	16.1	B	0.35	24.4	C	0.14	17.5	B
		T	0.46	19.9	B	0.47	22.5	C	0.77	27.6	C	0.51	23.1	C
	SB	L	0.22	15.5	B	0.16	16.4	B	0.41	35.6	D	0.35	22.0	C
		T	1.01	53.7	D	0.46	22.3	C	0.62	23.2	C	0.53	23.5	C
	EB	LTR	0.24	36.1	D	0.34	35.0	C	0.33	37.9	D	0.29	33.9	C
	WB	LTR	0.38	39.1	D	0.46	37.7	D	0.40	39.5	D	0.38	36.2	D
Overall			41.9	D		24.6	C		27.3	C		24.7	C	
Grand Concourse NB Service Road & E. Burnside Avenue	NB	TR	0.47	20.3	C	0.39	21.2	C	0.57	22.2	C	0.34	20.5	C
	EB	LT	0.35	26.2	C	0.18	20.9	C	0.23	24.2	C	0.28	22.4	C
	WB	TR	0.52	43.5	D	0.44	37.1	D	0.50	41.7	D	0.45	37.8	D
	Overall			25.5	C		25.0	C		26.0	C		24.9	C
E. 181st Street & Morris Avenue	NB	LT	0.28	12.2	B	0.27	12.2	B	0.44	13.8	B	0.37	13.0	B
	WB	TR	0.54	16.9	B	0.48	15.8	B	0.68	20.9	C	0.34	13.6	B
	Overall		14.5	B		13.9	B		16.8	B		13.2	14.5	B
Grand Concourse SB Service Road & E. 181st Street	SB	TR	0.39	16.7	B	0.39	16.7	B	0.44	17.4	B	0.45	17.7	B
	WB	LT	0.13	25.7	C	0.18	26.4	C	0.37	29.4	C	0.33	28.6	C
	Overall			17.8	B		18.3	B		20.7	C		20.4	C
Grand Concourse mainline & E. 181st Street	NB	L	0.65	54.8	D	0.25	16.5	B	0.73	42.2	D	0.38	20.6	C
		T	0.37	16.4	B	0.40	16.7	B	0.89	31.5	C	0.43	17.2	B
	SB	T	0.83	28.0	C	0.35	16.1	B	0.53	18.8	B	0.46	17.7	B
	WB	LTR	0.15	26.0	C	0.15	26.0	C	0.33	28.7	C	0.27	27.6	C
	Overall			25.2	C		17.1	B		27.7	C		18.7	B
Grand Concourse NB Service Road & E. 181st Street	NB	LT	0.25	14.9	B	0.26	15.1	B	0.45	17.6	B	0.29	15.4	B
	WB	TR	0.18	26.5	C	0.19	26.7	C	0.38	29.7	C	0.33	28.8	C
	Overall			17.5	B		17.6	B		20.6	C		19.7	B

Figure 4-15
Future Conditions 2018 – Intersections with LOS D, E, and F
AM Peak Hour

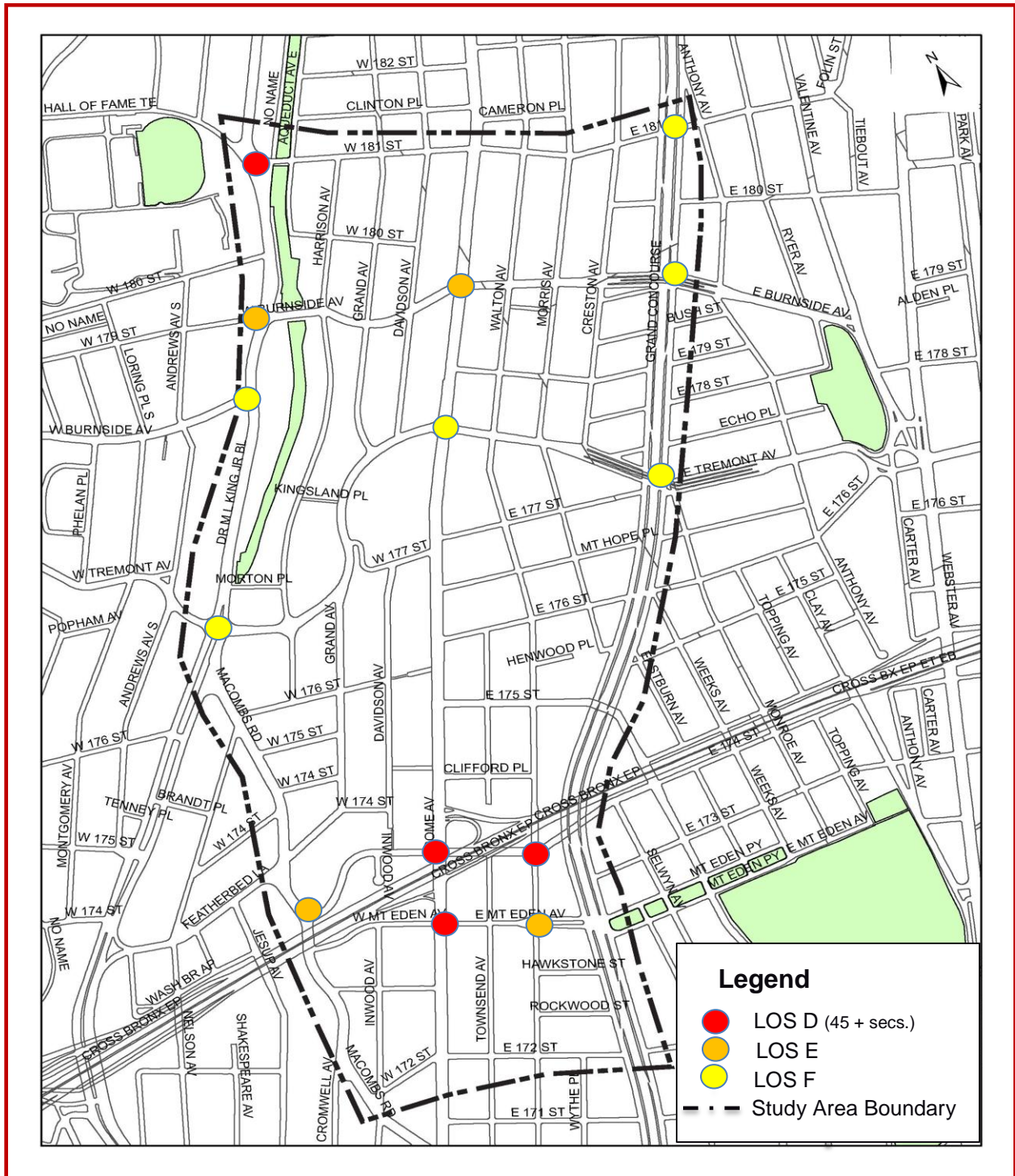


Figure 4-16
Future Conditions 2018 – Intersections with LOS D, E, and F
Midday Peak Hour

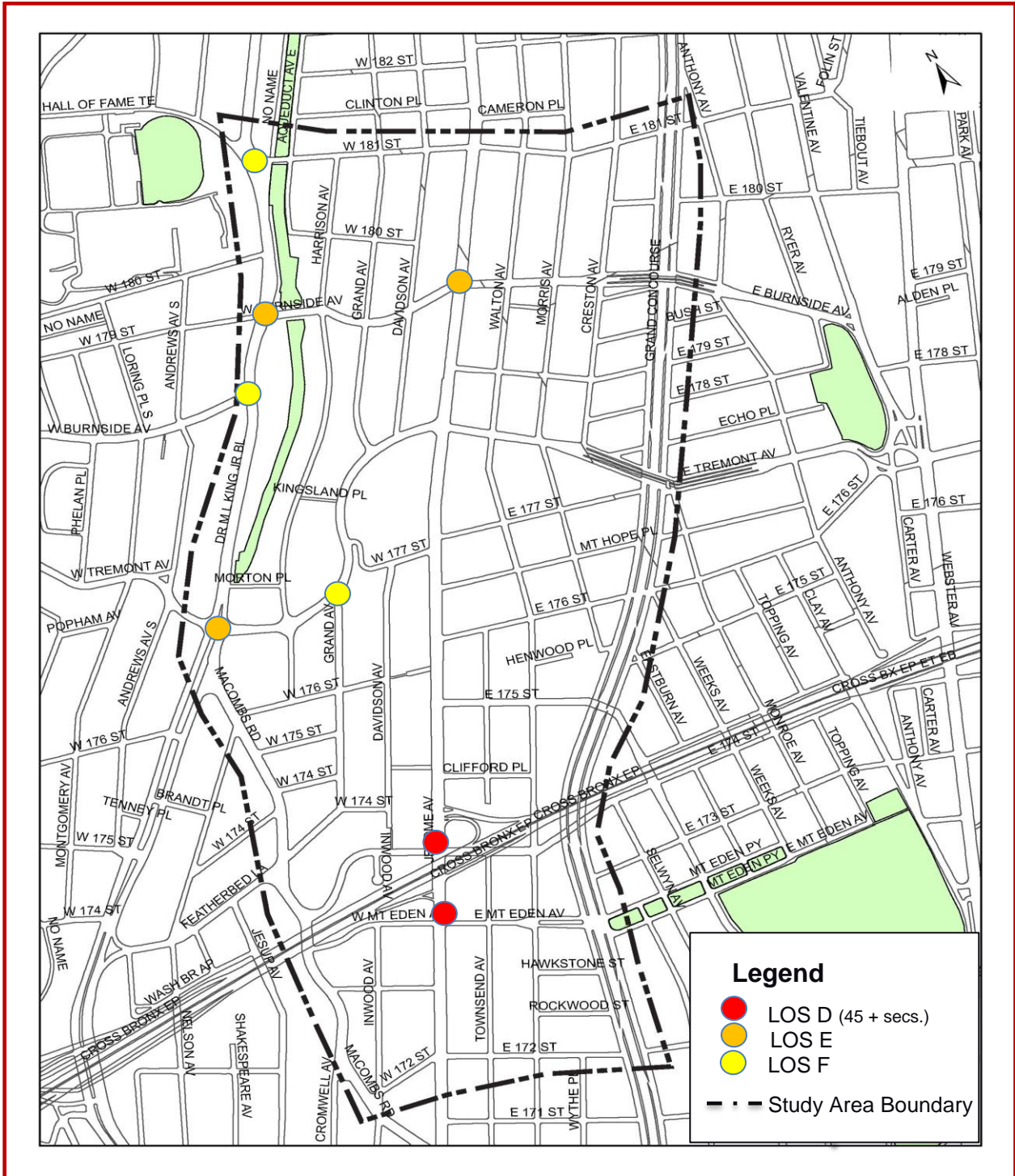
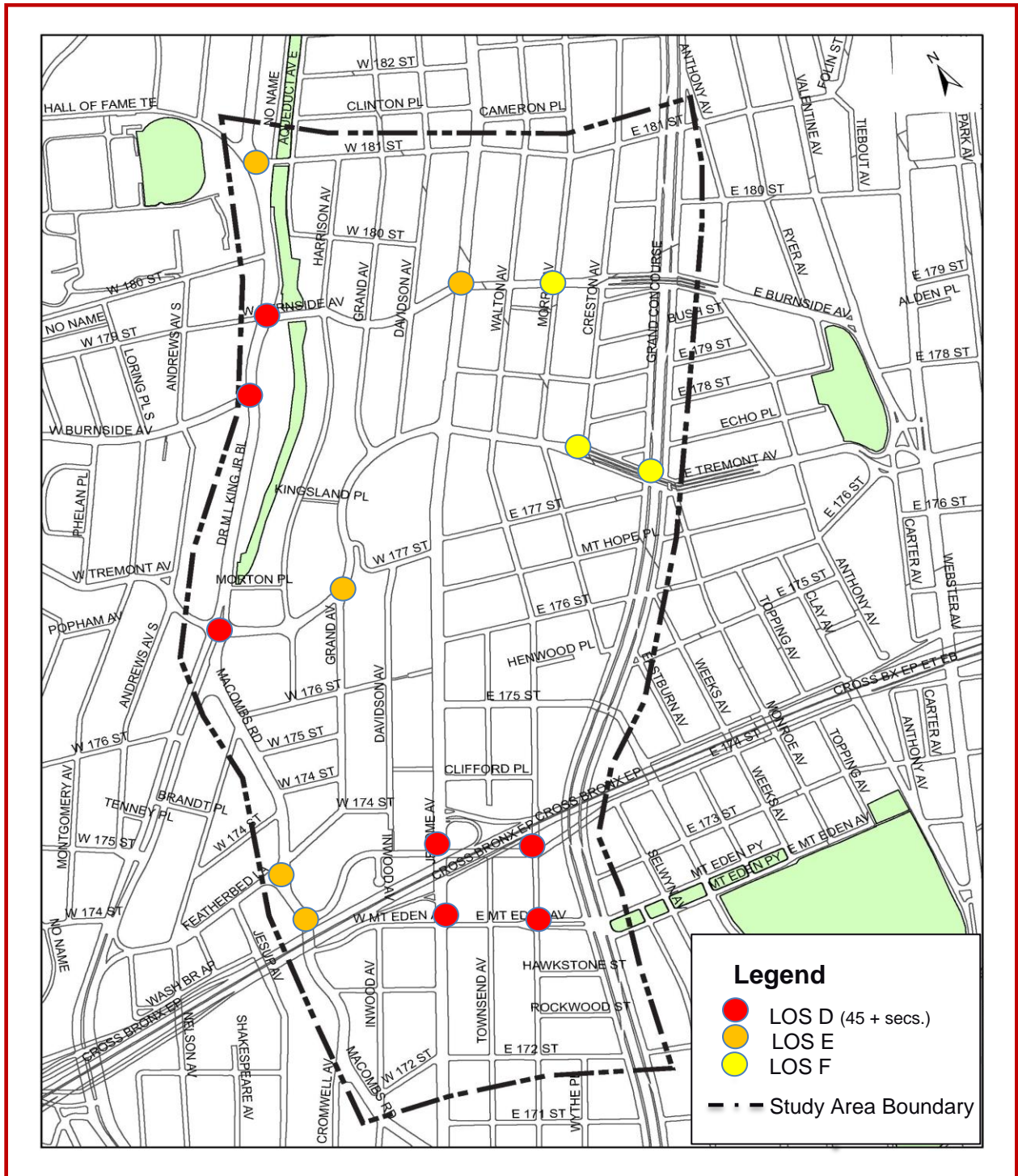
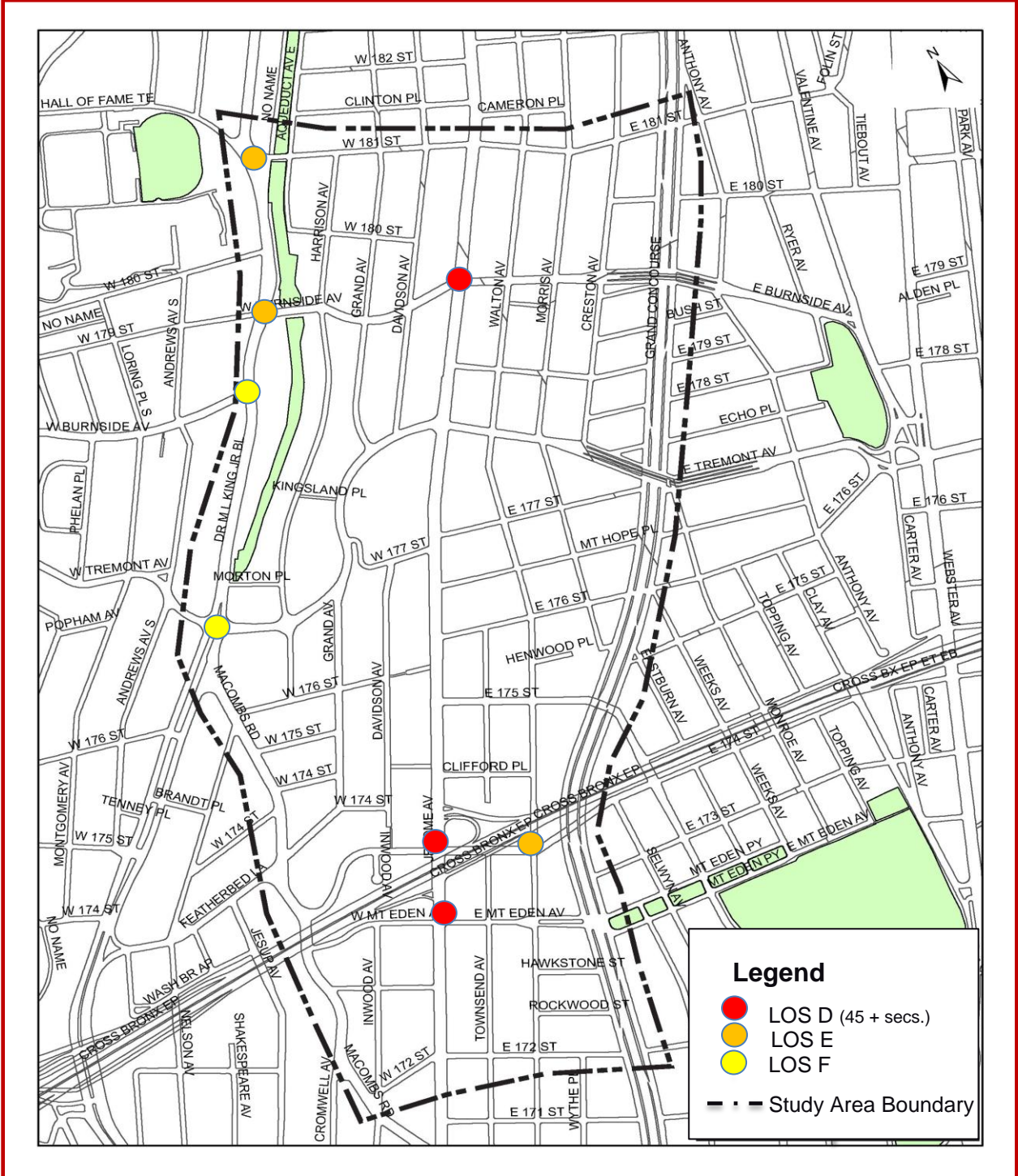


Figure 4-17
Future Conditions 2018 – Intersections with LOS D, E, and F
PM Peak Hour



**Figure 4-18
 Future Conditions 2018 – Intersections with LOS D, E, and F
 Saturday Midday Peak Hour**



4.8 Goods Movement

Introduction

New York City is heavily dependent on trucks for delivery of goods and services. Thousands of local and through truck trips traverse the city to satisfy its daily needs. Given the reliance upon trucks for goods movement in New York City, the need to examine truck traffic as part of any traffic and transportation study is obvious. Though trucks provide a vital service, their presence requires space for loading and unloading and they add to existing noise, air pollution, congestion, and safety issues throughout the City.

Truck routes in the study area

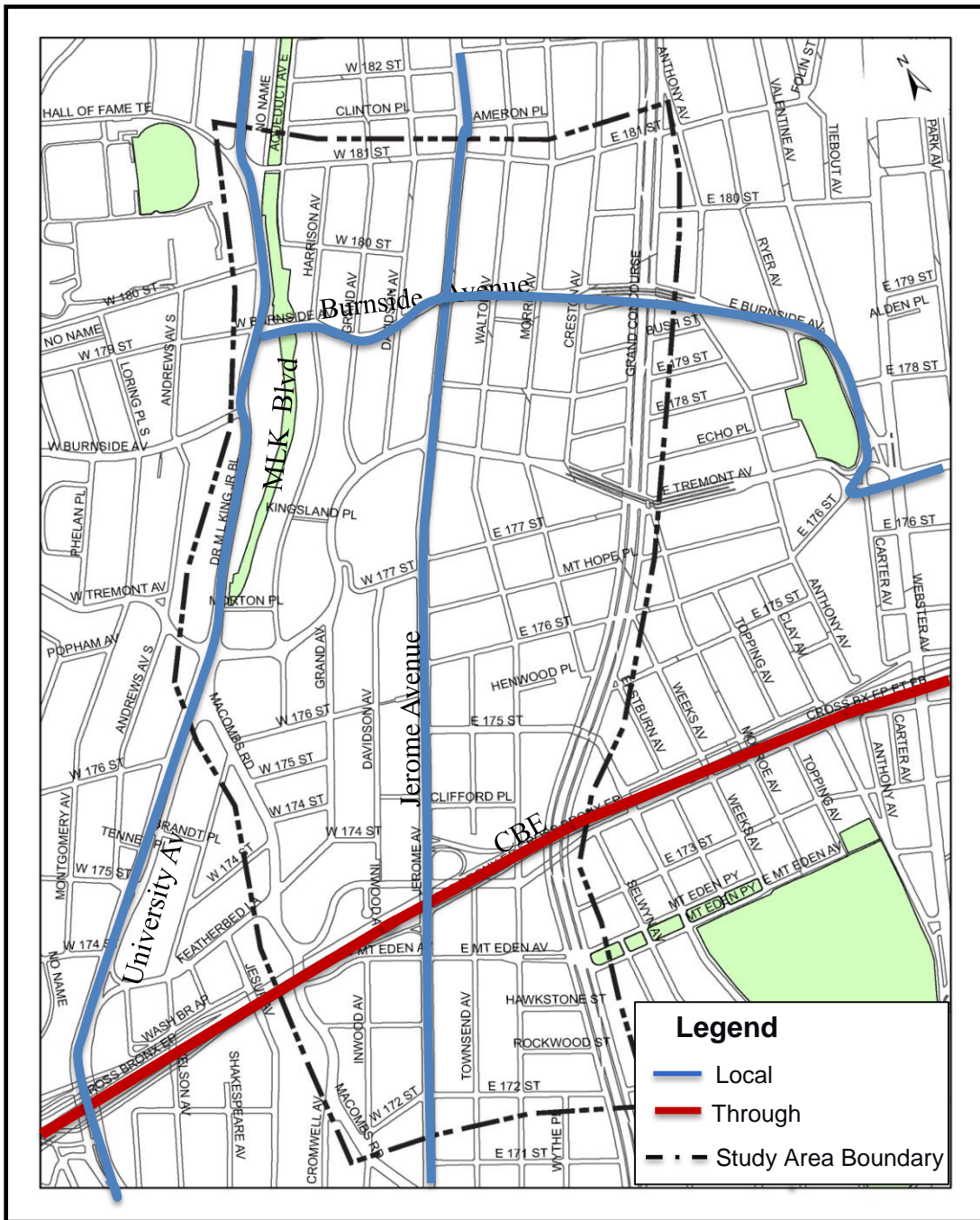
There is one designated through truck route and three local truck routes in the study area. The Cross Bronx Expressway is a main east-west through truck route which is one of the most congested corridors in the city. Jerome and University Avenues are local north-south truck routes, while Burnside Avenue is an east-west throughout the study area. Figure 4-19 shows local and through truck routes in the study area. Photo below shows Cross Bronx Expressway, a heavily used through truck route passing through the study area.



Cross Bronx Expressway, looking west from Grand Concourse

Jerome Avenue carries moderate levels of truck traffic, about seven percent of total traffic. Truck loading and unloading create additional congestion and circulation problems in the study area.

**Figure 4-19
Truck Routes**



5.0 PEDESTRIAN AND BICYCLES

5.1 Introduction

Generally, all trips generated by land uses within the study area contain a walking component either at the beginning or at the end. The pedestrian analysis focused on locations where pedestrian volumes were observed, while bicycle issues were confined to bike routes in the study area.

5.2 Pedestrian Analysis – Existing Conditions

Pedestrian analyses for crosswalks and corners were conducted for 24 locations as shown in the traffic count map and listed below:

1. Jerome Avenue & 172nd Street
2. Jerome Avenue & Mt Eden Avenue
3. Jerome Avenue & Featherbed Lane/174th Street
4. Jerome Avenue & 175th Street
5. Jerome Avenue & 176th Street
6. Jerome Avenue & Tremont Avenue
7. Jerome Avenue & Burnside Avenue
8. Jerome Avenue & 181st Street
9. Townsend Avenue & East Mt Eden Avenue
10. Walton Avenue & East Mt Eden Avenue
11. Walton Avenue & East 174th Street
12. Grand Avenue & Macombs Road
13. Dr. Martin L King Jr. Blvd/University Avenue & West Tremont Avenue
14. Dr. Martin L King Jr. Blvd/University Avenue & West Burnside Avenue
15. Dr. Martin L King Jr. Blvd/University Ave. & W. Burnside Ave./179th Street
16. Dr. Martin L King Jr. Blvd/University Avenue & West 181st Street
17. Creston Avenue & East Tremont Avenue
18. Grand Avenue & West Burnside Avenue
19. Davidson Avenue & West Burnside Avenue

20. Grand Concourse and East Burnside Avenue
21. Walton Avenue & East Burnside Avenue
22. Morris Avenue & East Burnside Avenue
23. Morris Avenue and East 181st Street
24. Creston Avenue & East Burnside Avenue

5.3 Existing Pedestrian Volumes

The major corridors with significant pedestrian volumes are Burnside Avenue, Jerome Avenue, University Avenue, 181st Street and Tremont Avenue. Also, significant pedestrian traffic was observed at the entrances/exits to subway/bus stations and transfer points. Figures 5-1 to 5-4 show peak hour pedestrian volumes.

**Figure 5-1: Existing Pedestrian Volumes
AM Peak Hour**

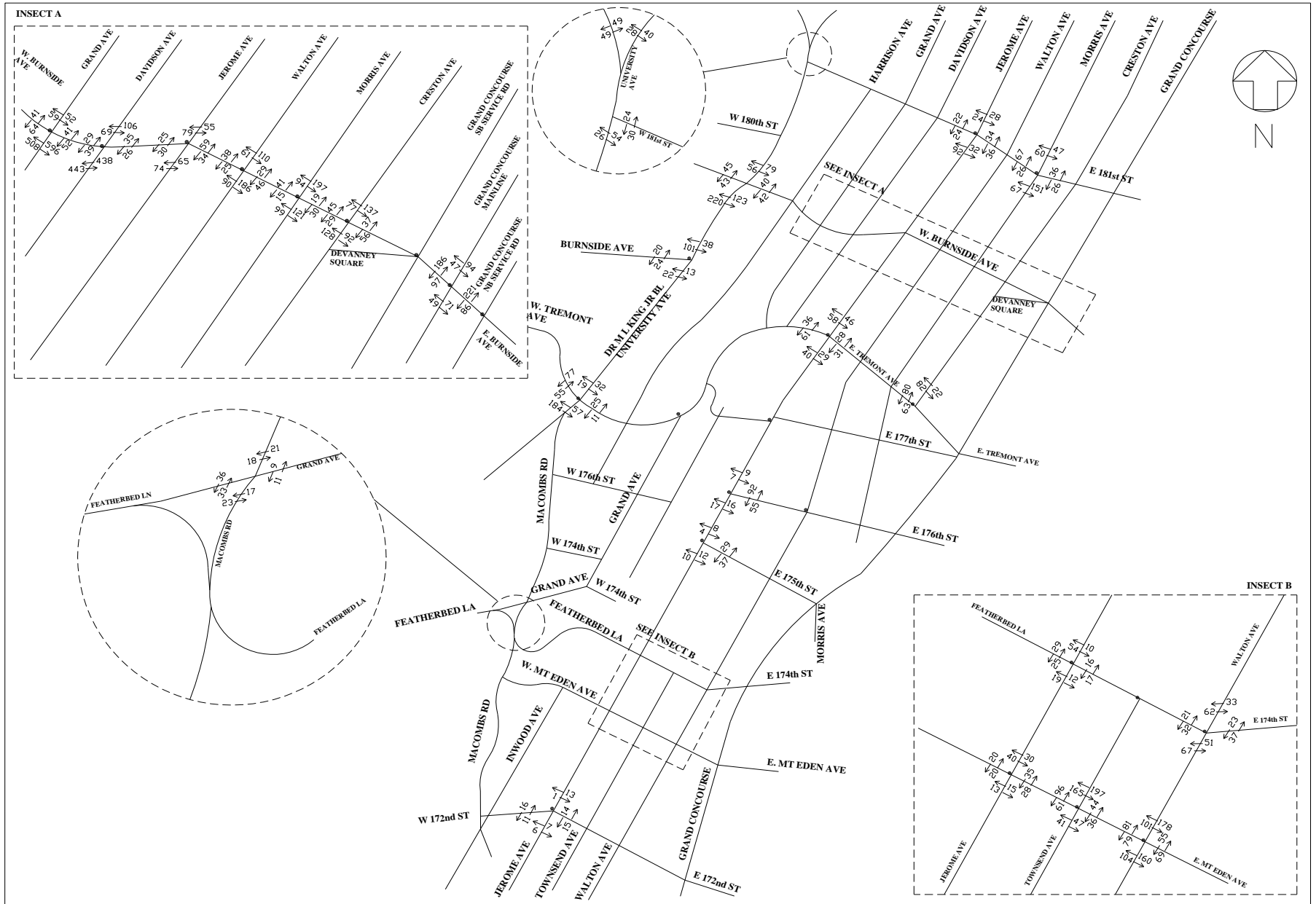
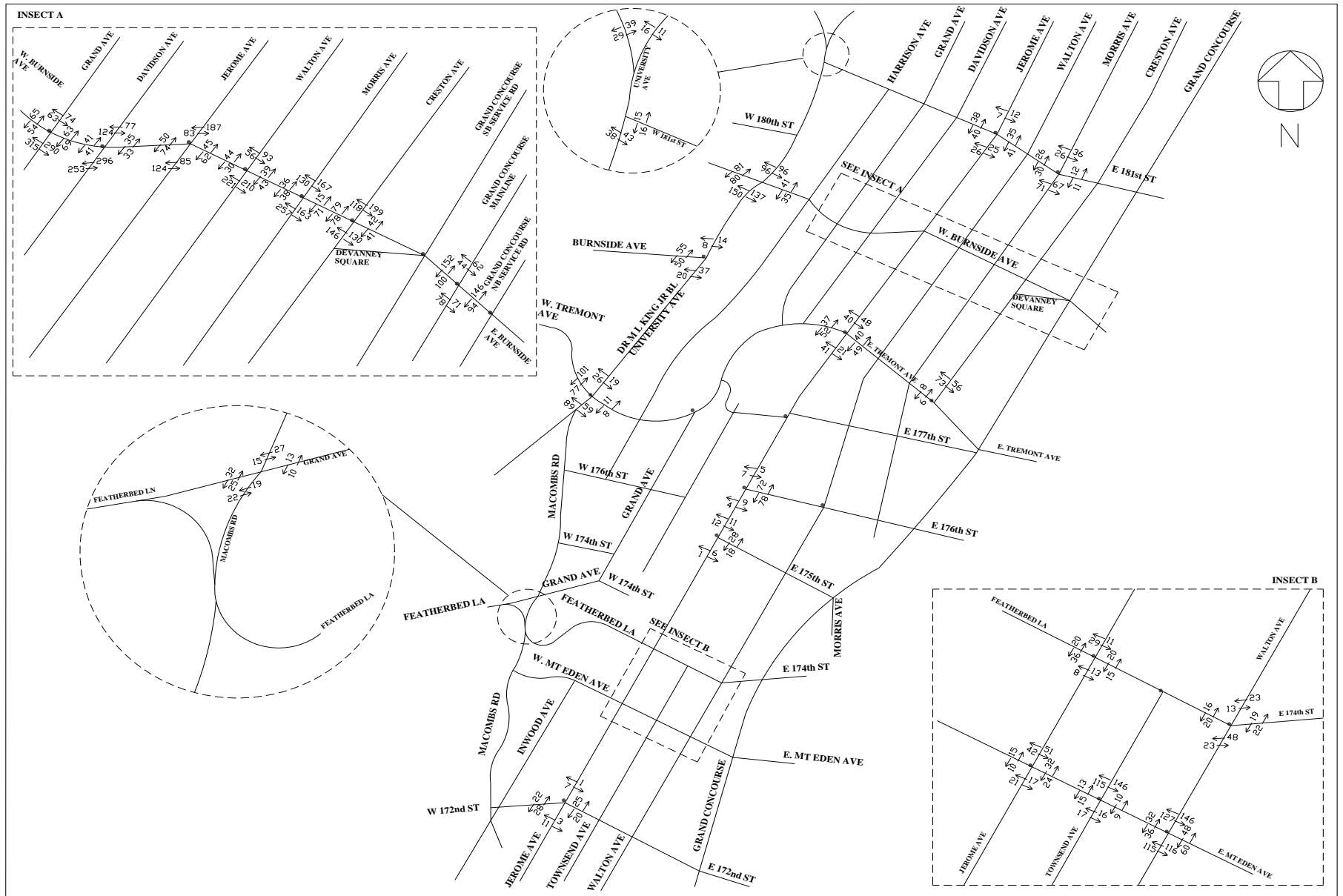
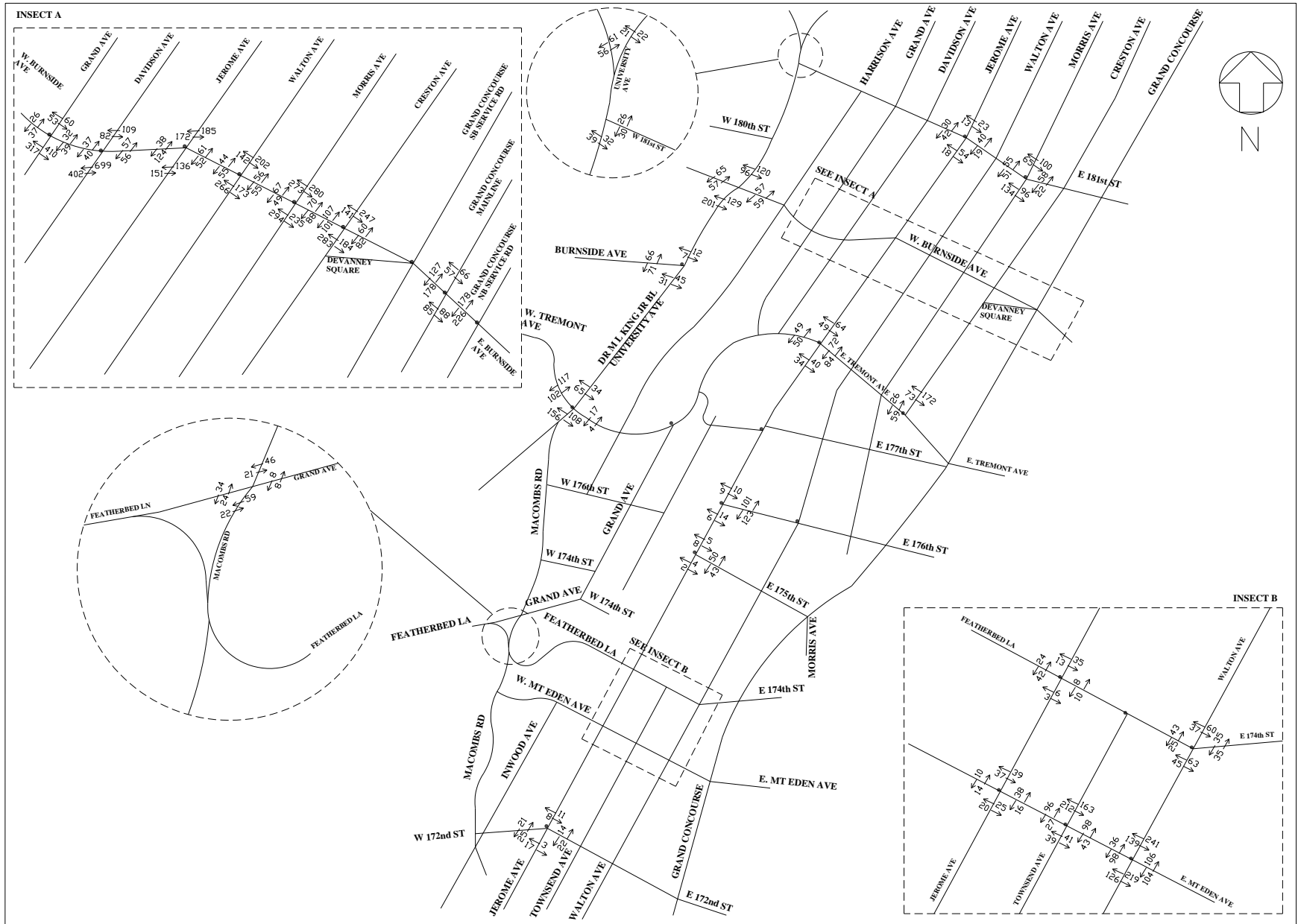


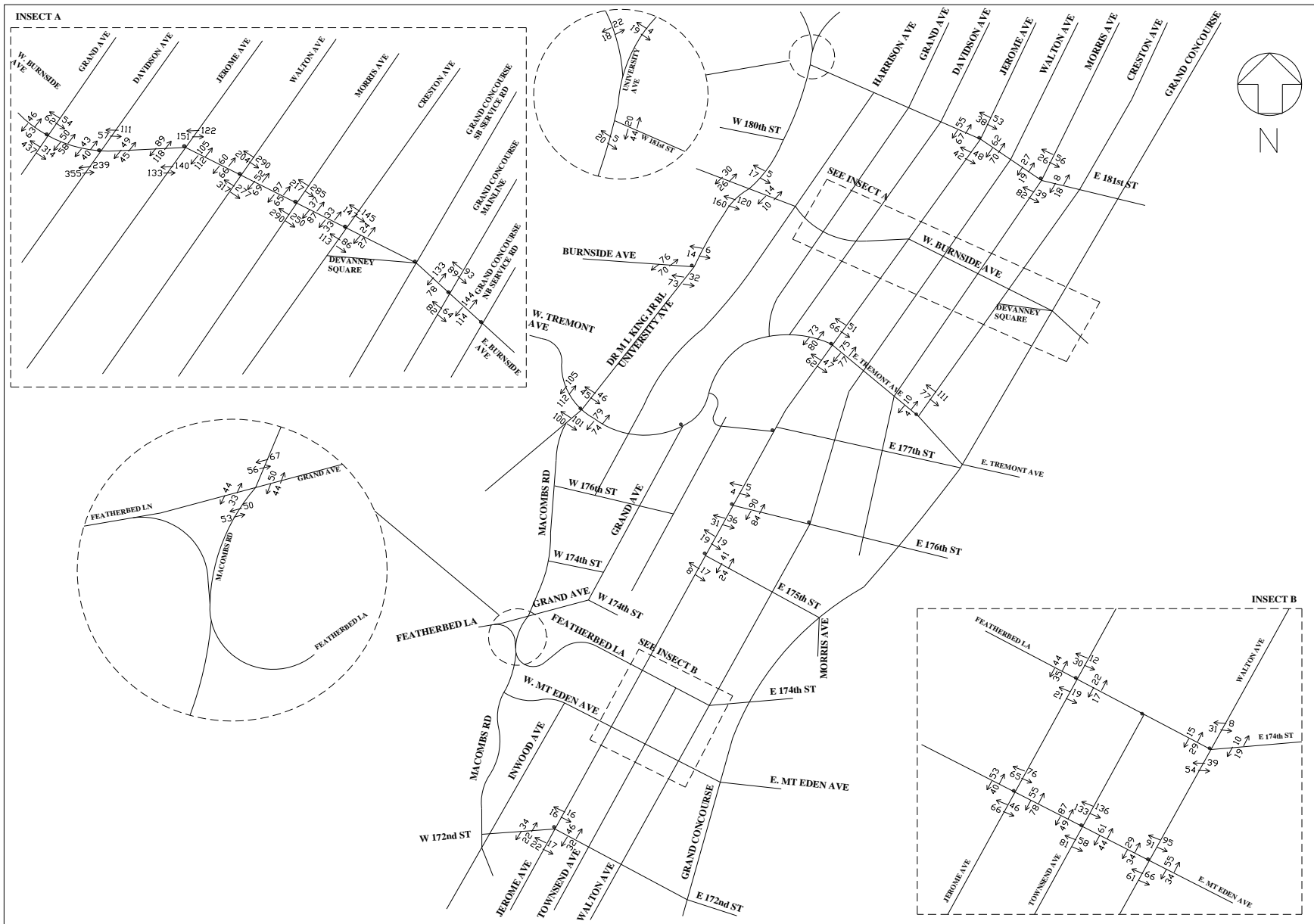
Figure 5-2: Existing Pedestrian Volumes Midday Peak Hour



**Figure 5-3: Existing Pedestrian Volumes
PM Peak Hour**



**Figure 5-4: Existing Pedestrian Volumes
Saturday Midday Peak Hour**



5.4 Level of Service (LOS) Analysis

The pedestrian level of service (LOS) analysis was performed by using the 2000 Highway Capacity Manual methodology. Pedestrian LOS is measured as the pedestrian flow rate per minute per foot of width (p/min/ft). This indicates the quality of pedestrian movement and comfort, and is defined in a density-comfort relationship. Table 5-1 shows the LOS criteria for crosswalks and corners, which is measured in a square feet of space per pedestrian. Pedestrian volumes were collected in 15-minute increments during peak hours; the weekday peak hours are 8-9 AM, 1-2 PM midday, and 5-6 PM, and the Saturday 1-2 PM midday peak.

Table 5-1: Level of Service Criteria for Pedestrians

LOS	Descriptions	Space (ft²/p)	Flow Rate (p/min/ft)	Speed (ft/s)	v/c Ratio
A	Unrestricted	>60	< or = 5	>4.25	< or = 0.21
B	Slightly restricted	40 – 60	5 – 7	4.17 – 4.25	0.21 – 0.31
C	Restricted but fluid	24 – 40	7 – 10	4.00 – 4.17	0.31 – 0.44
D	Restricted; necessary to continuously alter walking stride and direction	15 – 24	10 – 15	3.75 – 4.00	0.44 – 0.65
E	Severely restricted	8 – 15	15 – 23	2.50 – 3.75	0.65 – 1.00
F	Forward progress only by shuffling; no reverse movement possible	< or = 8	variable	< or = 2.50	variable

Source: Highway Capacity Manual, Transportation Research Board, National Research Council, Washington D.C., 2000.

Crosswalk LOS Analysis

The pedestrian analysis for crosswalks reveals that all crosswalks at the 24 locations operated at an acceptable LOS of C or better. The volume of pedestrians, relative to the physical characteristic of a crosswalk, results in almost universally unrestricted conditions. There were only 4 intersections where one or more crosswalks operated at LOS B or C during one or more peak hours; the remaining intersection crosswalks operated consistently at LOS A.

- Dr. Martin L King Jr. Blvd/University Avenue and Burnside Avenue/179th Street: AM (C), MD (B), PM (C), and Saturday (B);
- Grand Avenue and Burnside Avenue: AM (C), PM (B), and Saturday (B);
- Creston Avenue and Burnside Avenue: PM (B); and
- Morris Avenue and East 181st Street: AM (B).

The results of the crosswalk analysis are shown in Table 5-2.

Corner LOS Analysis

Similarly, the pedestrian corner analysis at the 24 locations shows all at acceptable LOS C or better. There was only one intersection where corners operated at LOS C, two intersections at LOS B during one or more peak hours, while all other locations operated consistently at LOS A.

- Grand Avenue and Burnside Avenue: AM (B); and
- Davidson Avenue and Burnside Avenue: AM (B), midday (B), and PM (C).

The results of the corner analysis are shown in Table 5-3.

Table 5-2: Crosswalk LOS Analysis – Existing Conditions (Page 1 of 2)

Intersection	Crosswalk	AM		MD		PM		Sat	
		SF/P	LOS	SF/P	LOS	SF/P	LOS	SF/P	LOS
Jerome Avenue & 172nd Street	North	1741.8	A	2615.0	A	1743.1	A	1126.5	A
	South	1071.5	A	1211.3	A	765.2	A	637.3	A
	East	1411.7	A	910.4	A	1032.7	A	619.1	A
	West	1179.3	A	840.4	A	733.3	A	759.3	A
Jerome Avenue & Mt Eden Avenue	North	378.9	A	323.7	A	322.7	A	211.5	A
	South	1233.3	A	844.8	A	739.8	A	318.8	A
	East	784.6	A	734.0	A	1048.1	A	413.0	A
	West	839.6	A	2376.5	A	2421.1	A	428.1	A
Jerome Avenue & Featherbed Lane/174th Street	North	320.1	A	515.3	A	418.6	A	442.4	A
	South	763.2	A	1225.8	A	2044.9	A	591.7	A
	East	1182.1	A	871.5	A	2081.1	A	906.6	A
	West	857.4	A	779.5	A	568.6	A	417.4	A
Jerome Avenue & 175th Street	North	2620.5	A	1851.8	A	1569.3	A	988.9	A
	South	1293.7	A	3802.5	A	3758.6	A	1256.0	A
	East	782.3	A	904.3	A	562.9	A	724.0	A
	West	x	x	x	x	x	x	x	x
Jerome Avenue & 176th Street	North	1935.3	A	2326.7	A	1645.0	A	2889.9	A
	South	977.0	A	1974.0	A	203.8	A	337.0	A
	East	406.1	A	431.5	A	280.8	A	422.4	A
	West	x	x	x	x	x	x	x	x
Jerome Avenue & Tremont Avenue	North	654.2	A	745.9	A	494.7	A	543.9	A
	South	785.4	A	740.8	A	740.4	A	539.2	A
	East	834.9	A	696.9	A	364.8	A	361.0	A
	West	626.4	A	715.3	A	586.2	A	402.4	A
Jerome Avenue & Burnside Avenue	North	320.9	A	271.1	A	127.2	A	156.9	A
	South	338.3	A	210.3	A	142.6	A	176.5	A
	East	336.7	A	272.6	A	309.2	A	133.6	A
	West	472.2	A	241.7	A	125.6	A	116.8	A
Jerome Avenue & 181st Street	North	431.2	A	1646.1	A	899.4	A	384.6	A
	South	194.0	A	694.0	A	494.8	A	417.7	A
	East	830.2	A	649.8	A	1015.8	A	518.8	A
	West	850.7	A	619.4	A	705.7	A	436.3	A
Townsend Avenue & Mt. Eden Avenue	North	91.5	A	200.4	A	130.8	A	176.8	A
	South	508.5	A	1496.3	A	562.6	A	396.2	A
	East	425.0	A	1534.1	A	242.1	A	333.9	A
	West	278.8	A	945.6	A	444.3	A	360.3	A
Walton Avenue & 174th Street	North	250.5	A	643.7	A	277.3	A	554.7	A
	South	113.5	A	208.0	A	170.4	A	212.9	A
	East	436.1	A	816.2	A	456.0	A	966.0	A
	West	363.0	A	612.9	A	434.3	A	627.7	A
Walton Avenue & Mt. Eden Avenue	North	148.3	A	214.8	A	143.9	A	295.6	A
	South	134.1	A	281.3	A	125.3	A	489.3	A
	East	136.1	A	293.6	A	122.4	A	350.0	A
	West	92.0	A	367.4	A	82.1	A	442.2	A
Grand Avenue & Macombs Road	North	567.2	A	603.4	A	357.6	A	264.3	A
	South	589.4	A	486.3	A	312.5	A	248.2	A
	East	1361.1	A	1391.5	A	1053.4	A	372.1	A
	West	464.3	A	777.0	A	782.6	A	644.6	A

Table 5-2: Crosswalk LOS Analysis – Existing Conditions (Page 2 of 2)

Intersection	Crosswalk	AM		MD		PM		Sat	
		SF/P	LOS	SF/P	LOS	SF/P	LOS	SF/P	LOS
Dr. Martin L King Jr Boulevard/University Avenue & Tremont Avenue	North	676.4	A	774.7	A	379.5	A	329.2	A
	South	187.9	A	260.4	A	173.4	A	190.4	A
	East	1254.8	A	3006.9	A	1288.6	A	304.8	A
	West	507.4	A	350.7	A	226.0	A	214.1	A
Dr. Martin L King Jr Boulevard/University Avenue & Burnside Avenue	North	247.9	A	3324.3	A	2781.9	A	2834.5	A
	South	1350.4	A	1021.6	A	728.2	A	663.5	A
	East	x	x	x	x	x	x	x	x
	West	1359.7	A	808.3	A	597.5	A	562.7	A
Dr. Martin L King Jr Boulevard/University Avenue & Burnside Avenue/179th Street	North	63.5	A	49.9	B	35.0	C	254.7	A
	South	34.8	C	41.0	B	34.8	C	44.7	B
	East	635.5	A	585.1	A	484.4	A	2523.9	A
	West	578.9	A	405.8	A	537.2	A	1046.6	A
Dr. Martin L King Jr Boulevard/University Avenue & 181st Street	North	583.4	A	1480.6	A	986.6	A	1449.9	A
	South	539.9	A	573.8	A	598.4	A	1204.9	A
	East	630.8	A	1334.3	A	629.9	A	486.5	A
	West	309.8	A	615.1	A	189.7	A	928.3	A
Creston Avenue & Tremont Avenue	North	399.7	A	329.1	A	184.0	A	265.1	A
	South	x	x	x	x	x	x	x	x
	East	x	x	x	x	x	x	x	x
	West	156.0	A	1362.7	A	312.6	A	1884.0	A
Grand Avenue & Burnside Avenue	North	414.1	A	338.0	A	367.0	A	414.5	A
	South	36.4	C	60.1	A	53.5	B	52.3	B
	East	311.1	A	218.8	A	387.7	A	202.6	A
	West	279.1	A	230.3	A	402.9	A	237.4	A
Davidson Avenue & Burnside Avenue	North	298.7	A	210.8	A	227.3	A	284.0	A
	South	68.7	A	101.1	A	61.8	A	116.6	A
	East	418.4	A	339.6	A	206.0	A	282.0	A
	West	419.1	A	336.6	A	361.7	A	379.3	A
Walton Avenue & Burnside Avenue	North	326.0	A	337.7	A	147.7	A	133.9	A
	South	208.4	A	140.1	A	130.0	A	98.4	A
	East	321.0	A	298.8	A	223.7	A	248.5	A
	West	400.0	A	318.3	A	269.5	A	189.1	A
Morris Avenue & Burnside Avenue	North	157.1	A	164.6	A	83.6	A	83.6	A
	South	179.0	A	110.2	A	77.1	A	80.6	A
	East	392.8	A	197.3	A	115.2	A	160.1	A
	West	436.8	A	340.8	A	220.7	A	156.1	A
Creston Avenue & Burnside Avenue	North	249.1	A	141.1	A	126.7	A	172.4	A
	South	227.9	A	186.7	A	114.3	A	268.8	A
	East	94.1	A	161.3	A	77.2	A	249.2	A
	West	120.7	A	63.0	A	40.1	B	131.8	A
Grand Concourse & Burnside Avenue	North	136.5	A	196.4	A	97.8	A	131.0	A
	South	171.9	A	147.0	A	105.0	A	180.7	A
	East	161.6	A	205.8	A	123.7	A	192.0	A
	West	148.8	A	204.2	A	171.4	A	233.4	A
Morris Avenue & 181st Street	North	118.4	A	224.9	A	60.4	A	154.1	A
	South	47.7	B	144.3	A	63.3	A	146.6	A
	East	361.4	A	723.8	A	189.2	A	447.7	A
	West	125.0	A	276.1	A	132.4	A	265.4	A

Table 5-3: Corner LOS Analysis – Existing Conditions (Page 1 of 2)

Intersection	Corner	AM		MD		PM		Sat	
		SF/P	LOS	SF/P	LOS	SF/P	LOS	SF/P	LOS
Jerome Avenue & 172nd Street	NE	1146.2	A	1062.0	A	1250.9	A	583.8	A
	NW	2049.9	A	1753.2	A	1476.5	A	1022.2	A
	SE	650.8	A	577.4	A	441.8	A	293.2	A
	SW	1520.4	A	1263.0	A	914.4	A	703.7	A
Jerome Avenue & Mt Eden Avenue	NE	297.0	A	454.7	A	544.3	A	341.9	A
	NW	457.2	A	196.7	A	544.3	A	341.9	A
	SE	624.4	A	541.5	A	622.8	A	344.6	A
	SW	826.9	A	1153.7	A	1189.5	A	423.2	A
Jerome Avenue & Featherbed Lane/174th Street	NE	609.8	A	620.5	A	1148.8	A	538.6	A
	NW	668.8	A	644.0	A	504.1	A	446.4	A
	SE	717.8	A	816.7	A	1841.7	A	506.9	A
	SW	836.8	A	774.6	A	696.1	A	300.9	A
Jerome Avenue & 175th Street	NE	625.0	A	714.3	A	570.0	A	503.9	A
	NW	x	x	x	x	x	x	x	x
	SE	1234.9	A	1689.6	A	939.2	A	993.4	A
	SW	x	x	x	x	x	x	x	x
Jerome Avenue & 176th Street	NE	537.2	A	526.1	A	405.6	A	283.2	A
	NW	x	x	x	x	x	x	x	x
	SE	655.6	A	462.5	A	339.9	A	204.0	A
	SW	x	x	x	x	x	x	x	x
Jerome Avenue & Tremont Avenue	NE	404.5	A	363.8	A	230.9	A	292.1	A
	NW	164.2	A	169.0	A	145.0	A	219.7	A
	SE	433.6	A	486.8	A	261.3	A	271.5	A
	SW	283.2	A	300.1	A	321.5	A	275.9	A
Jerome Avenue & Burnside Avenue	NE	396.3	A	357.8	A	220.8	A	269.4	A
	NW	520.1	A	375.2	A	192.1	A	295.8	A
	SE	71.1	A	64.6	A	52.2	A	79.9	A
	SW	245.9	A	192.5	A	118.5	A	177.1	A
Jerome Avenue & 181st Street	NE	679.9	A	696.2	A	1097.2	A	390.2	A
	NW	668.6	A	984.1	A	983.3	A	426.0	A
	SE	358.8	A	581.1	A	705.9	A	379.2	A
	SW	384.8	A	800.5	A	712.3	A	411.1	A
Townsend Avenue & Mt. Eden Avenue	NE	63.7	A	131.7	A	62.2	A	136.9	A
	NW	125.2	A	246.7	A	167.1	A	333.5	A
	SE	386.0	A	1404.3	A	356.7	A	490.2	A
	SW	329.7	A	891.7	A	340.0	A	518.6	A
Walton Avenue & 174th Street	NE	277.6	A	821.0	A	424.0	A	718.0	A
	NW	417.9	A	1006.7	A	532.6	A	1028.6	A
	SE	342.4	A	769.1	A	471.6	A	671.3	A
	SW	188.7	A	325.7	A	254.0	A	382.6	A
Walton Avenue & Mt. Eden Avenue	NE	189.2	A	295.0	A	179.7	A	362.7	A
	NW	112.5	A	229.8	A	105.2	A	261.9	A
	SE	292.7	A	586.2	A	272.7	A	894.7	A
	SW	107.3	A	285.9	A	100.1	A	350.3	A
Grand Avenue & Macombs Road	NE	342.6	A	343.1	A	200.4	A	128.4	A
	NW	658.2	A	378.6	A	640.4	A	525.5	A
	SE	1078.2	A	1103.7	A	816.5	A	549.8	A
	SW	467.3	A	642.7	A	432.4	A	814.8	A

Table 5-3: Corner LOS Analysis – Existing Conditions (Page 2 of 2)

Intersection	Corner	AM		MD		PM		Sat	
		SF/P	LOS	SF/P	LOS	SF/P	LOS	SF/P	LOS
Dr. Martin L King Jr Boulevard/University Avenue & Tremont Avenue	NE	1212.5	A	2027.7	A	944.8	A	356.3	A
	NW	961.8	A	932.5	A	583.7	A	427.7	A
	SE	153.7	A	202.6	A	127.0	A	78.0	A
	SW	289.2	A	325.2	A	240.9	A	233.4	A
Dr. Martin L King Jr Boulevard/University Avenue & Burnside Avenue	NE	x	x	x	x	x	x	x	x
	NW	1226.7	A	2826.9	A	2024.8	A	1218.2	A
	SE	x	x	x	x	x	x	x	x
	NW	2889.5	A	1703.5	A	1299.0	A	1422.3	A
Dr. Martin L King Jr Boulevard/University Avenue & Burnside Avenue/179th Street	NE	460.8	A	395.4	A	284.0	A	1862.6	A
	NW	562.3	A	420.2	A	422.4	A	1363.4	A
	SE	237.8	A	263.4	A	149.4	A	371.4	A
	SW	215.1	A	238.5	A	239.7	A	326.0	A
Dr. Martin L King Jr Boulevard/University Avenue & 181st Street	NE	1290.3	A	2146.1	A	1379.7	A	1132.1	A
	NW	852.3	A	1297.4	A	709.6	A	2320.2	A
	SE	630.1	A	779.1	A	612.7	A	736.9	A
	SW	180.0	A	245.2	A	101.4	A	410.2	A
Creston Avenue & Tremont Avenue	NE	487.3	A	487.3	A	280.2	A	263.7	A
	NW	330.5	A	489.1	A	265.0	A	321.6	A
	SE	x	x	x	x	x	x	x	x
	SW	x	x	x	x	x	x	x	x
Grand Avenue & Burnside Avenue	NE	343.7	A	287.2	A	388.9	A	298.8	A
	NW	368.1	A	313.6	A	398.6	A	356.0	A
	SE	76.8	A	108.5	A	110.1	A	91.8	A
	SW	56.7	B	91.3	A	78.4	A	79.0	A
Davidson Avenue & Burnside Avenue	NE	323.4	A	317.8	A	271.9	A	334.8	A
	NW	404.8	A	338.7	A	374.1	A	417.6	A
	SE	91.5	A	129.9	A	80.6	A	143.8	A
	SW	41.9	B	54.9	B	38.8	C	64.0	A
Walton Avenue & Burnside Avenue	NE	282.9	A	294.3	A	145.6	A	173.2	A
	NW	291.1	A	290.2	A	147.3	A	180.0	A
	SE	244.2	A	152.9	A	134.0	A	157.3	A
	SW	248.3	A	193.1	A	180.1	A	186.9	A
Morris Avenue & Burnside Avenue	NE	238.0	A	210.6	A	111.4	A	114.2	A
	NW	139.1	A	186.8	A	105.2	A	100.9	A
	SE	325.7	A	173.0	A	125.6	A	148.0	A
	SW	268.9	A	201.0	A	140.6	A	136.8	A
Creston Avenue & Burnside Avenue	NE	246.3	A	201.7	A	153.7	A	285.6	A
	NW	157.6	A	97.8	A	72.7	A	134.0	A
	SE	292.2	A	314.8	A	182.0	A	415.1	A
	SW	253.6	A	177.2	A	111.8	A	308.6	A
Grand Concourse & Burnside Avenue	NE	398.3	A	538.2	A	314.9	A	416.4	A
	NW	195.3	A	211.2	A	163.4	A	201.3	A
	SE	165.5	A	211.1	A	150.1	A	214.8	A
	SW	151.3	A	182.5	A	146.1	A	216.8	A
Morris Avenue & 181st Street	NE	270.6	A	686.4	A	141.4	A	405.7	A
	NW	237.6	A	413.8	A	153.5	A	289.2	A
	SE	189.3	A	366.6	A	151.9	A	301.8	A
	SW	107.9	A	313.9	A	161.9	A	360.3	A

5.5 Pedestrian Analysis - Future Conditions

Pedestrian volumes are expected to increase in the future due to various factors such as land use changes near developments and economic growth. The future projected pedestrian volumes were generated by applying a 0.38% compounded growth over ten-years as well as adding trips from known developments in the study area.

The analysis shows all intersection crosswalks operating at an acceptable LOS of C or better; only 4 of the 24 intersections have one or more crosswalks with LOS B or C during one or more peak hours. The results of the future conditions crosswalk analysis are shown in Tables 5-4.

For the corner analysis only three intersections corners would operate at LOS B or C during one or more peak hours. All other intersections corners would operate consistently at LOS A. The results of the future corner analysis are shown in Table 5-5.

**Table 5-4: Crosswalk LOS Analysis for Selected Locations
(2018 Future Conditions)**

Intersection	Crosswalk	AM		MD		PM		Sat	
		SF/P	LOS	SF/P	LOS	SF/P	LOS	SF/P	LOS
Dr. Martin L King Jr Boulevard/University Avenue & Burnside Avenue/179th Street	North	63.5	A	49.9	B	35.0	C	254.7	A
	South	34.8	C	41.0	B	34.8	C	44.7	B
	East	635.5	A	585.1	A	484.4	A	2523.9	A
	West	578.9	A	405.8	A	537.2	A	1046.6	A
Grand Avenue & Burnside Avenue	North	414.1	A	338.0	A	367.0	A	414.5	A
	South	36.4	C	60.1	A	53.5	B	52.3	B
	East	311.1	A	218.8	A	387.7	A	202.6	A
	West	279.1	A	230.3	A	402.9	A	237.4	A
Creston Avenue & Burnside Avenue	North	249.1	A	141.1	A	126.7	A	172.4	A
	South	227.9	A	186.7	A	114.3	A	268.8	A
	East	94.1	A	161.3	A	77.2	A	249.2	A
	West	120.7	A	63.0	A	40.1	B	131.8	A
Morris Avenue & 181st Street	North	118.4	A	224.9	A	60.4	A	154.1	A
	South	47.7	B	144.3	A	63.3	A	146.6	A
	East	361.4	A	723.8	A	189.2	A	447.7	A
	West	125.0	A	276.1	A	132.4	A	265.4	A

**Table 5-5: Corner LOS Analysis for Selected Locations
(2018 Future Conditions)**

Intersection	Corner	AM		MD		PM		Sat	
		SF/P	LOS	SF/P	LOS	SF/P	LOS	SF/P	LOS
Jerome Avenue & Burnside Avenue	NE	394.4	A	356.4	A	220.0	A	268.5	A
	NW	518.5	A	373.7	A	191.4	A	294.9	A
	SE	70.8	A	64.3	A	52.0	B	79.6	A
	SW	245.1	A	220.8	A	118.1	A	176.4	A
Townsend Avenue & Mt. Eden Avenue	NE	63.4	A	131.1	A	61.9	A	136.3	A
	NW	124.7	A	245.8	A	166.5	A	332.2	A
	SE	384.3	A	1404.3	A	355.2	A	488.0	A
	SW	328.0	A	889.7	A	339.1	A	516.5	A
Grand Avenue & Burnside Avenue	NE	345.9	A	286.2	A	387.4	A	297.7	A
	NW	366.5	A	312.2	A	397.2	A	354.5	A
	SE	76.7	A	108.1	A	109.7	A	91.4	A
	SW	56.5	B	90.9	A	78.1	A	78.7	A
Davidson Avenue & Burnside Avenue	NE	322.5	A	316.6	A	270.6	A	333.5	A
	NW	403.6	A	337.5	A	372.6	A	415.7	A
	SE	91.2	A	129.4	A	80.2	A	143.3	A
	SW	41.7	B	54.7	B	38.6	C	63.8	A

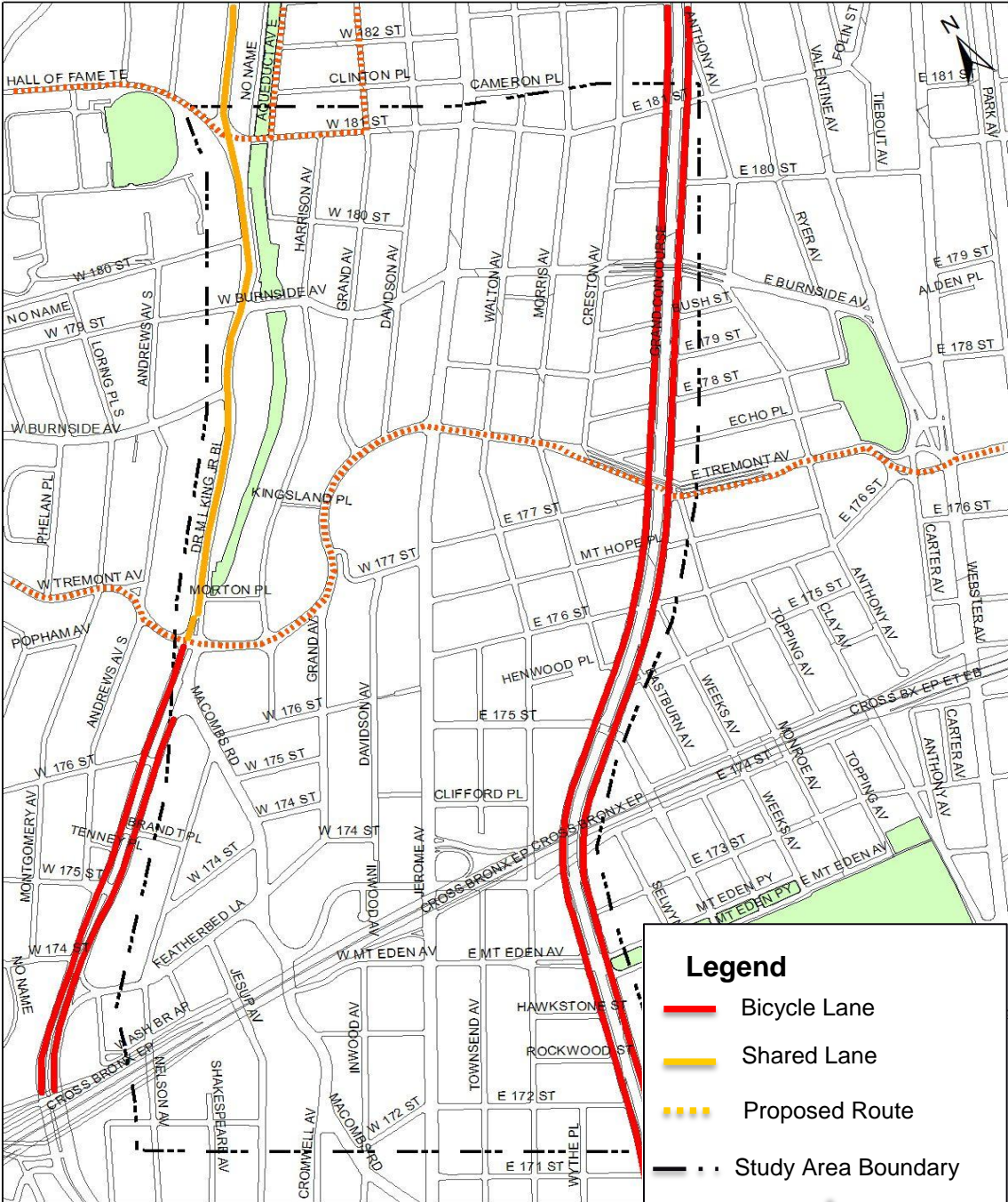
5.6 Bicycle Network

There are two on-street striped “*Bicycle Lanes*” in the study area: one along Grand Concourse, and one along University Avenue south of West Tremont Avenue. North of West Tremont Avenue on Dr. Martin Luther King Jr. Boulevard there is an on-street striped “*Shared Lane*” for bicycles.

The current New York City Cycling Map (2011) identifies three “*Proposed Routes*” in the study area: one is striped along Tremont Avenue and two others partially along West 181st Street /Hall of Fame and Grand and Aqueduct Avenues.

Figure 5-5 shows the existing and proposed bicycle facilities in the study area.

Figure 5-5: Existing and Proposed Bicycle Facilities



6.0 ACCIDENTS/SAFETY ANALYSIS

6.1 Introduction

The analysis of accidents and safety is an important component in traffic and transportation planning studies, as transportation related accidents can lead to loss of life and/or damage of property. The main purpose of accident analysis is to identify locations in the study area with safety issues that may need special attention and potentially safety improvement measures.

In order to identify locations with high accident occurrences in the study area, it was necessary to examine the most recent accident history to see if any patterns can be established. Existing reportable accident data for the last four years (2007 to 2010) was assembled and analyzed. These records were collected from the New York City Department of Transportation (NYCDOT) accident database which includes New York State Department of Motor Vehicle (NYSDMV) and New York Police Department (NYPD) reported accidents. The data provides information on location, severity, collision type, time of accident, and other related factors such as the weather condition in identify high accident locations.

6.2 Accident History (2007-2010)

Since NYSDMV stopped reporting “Non-Reportable” accidents, “High Accident Locations” based on “Reportable Accidents” are those with 23 or more “Reportable” accidents or five preventable pedestrian crashes per year.

After reviewing all the intersections in the study area for the most recent four-year (2007-2010), using the above criteria, two intersections, East/West Burnside Avenue/Jerome Avenue and Grand Concourse/East Mt. Eden Avenue/Mt. Eden Parkway qualified as a “High Pedestrian Accident Locations”. Nonetheless, it was felt that an examination of additional locations averaging no less than 8 “Reportable Accidents” per year might yield to some useful insights. Based on this rationale, six additional locations were identified for detailed analysis. Table 6-1 lists all eight locations and provides the summary of accident history from 2007 to 2010, while Figure 6-1 shows these locations on a study area map.

Table 6-1: Accident History (2007 – 2010)

Intersection	2007		2008		2009		2010		Total	
	Total Accidents	Peds	Total Accidents	Peds	Total Accidents	Peds	Total Accidents	Peds	Accidents	Peds
Jerome Ave./174 th St. & W. Burnside Avenue	8	6	12	6	0	0	2	1	22	13
Grand Concourse/E. Mt. Eden Ave/Parkway	12	2	9	6	15	3	9	2	45	13
Jerome Ave./Tremont Avenue	12	1	10	2	14	1	13	3	49	7
Jerome Ave./174 th St/ Featherbed Ln.	11	1	8	0	15	1	13	0	47	2
Jerome Ave./Mt. Eden Avenue	12	1	17	2	5	1	7	1	41	5
Grand Concourse/E. 181 st Street.	4	3	6	2	12	4	17	4	39	13
Dr. M. L. King Jr./W. Burnside Avenue	7	4	5	2	9	3	11	1	32	10
Jerome Ave./175 th Street	8	0	6	3	6	1	11	3	31	7
Total	74	18	73	23	76	14	83	15	306	70

The data shows that most accidents are clustered along two main corridors: Jerome Avenue and W. Burnside Avenue. On average 60% of all accidents involved pedestrians at the two “High Accident Locations.”

Injuries

Between 2007 and 2010, 388 people were injured as a result of 306 accidents occurring at the eight intersections where 70 injuries were sustained by pedestrians. The highest numbers of injuries were recorded at the intersection of Jerome Avenue/E./W. Tremont Avenue, where a total of 71 people were injured. Table 6-2 shows the total number of injuries by type.

Figure 6-1: Accident History (2007-2010)

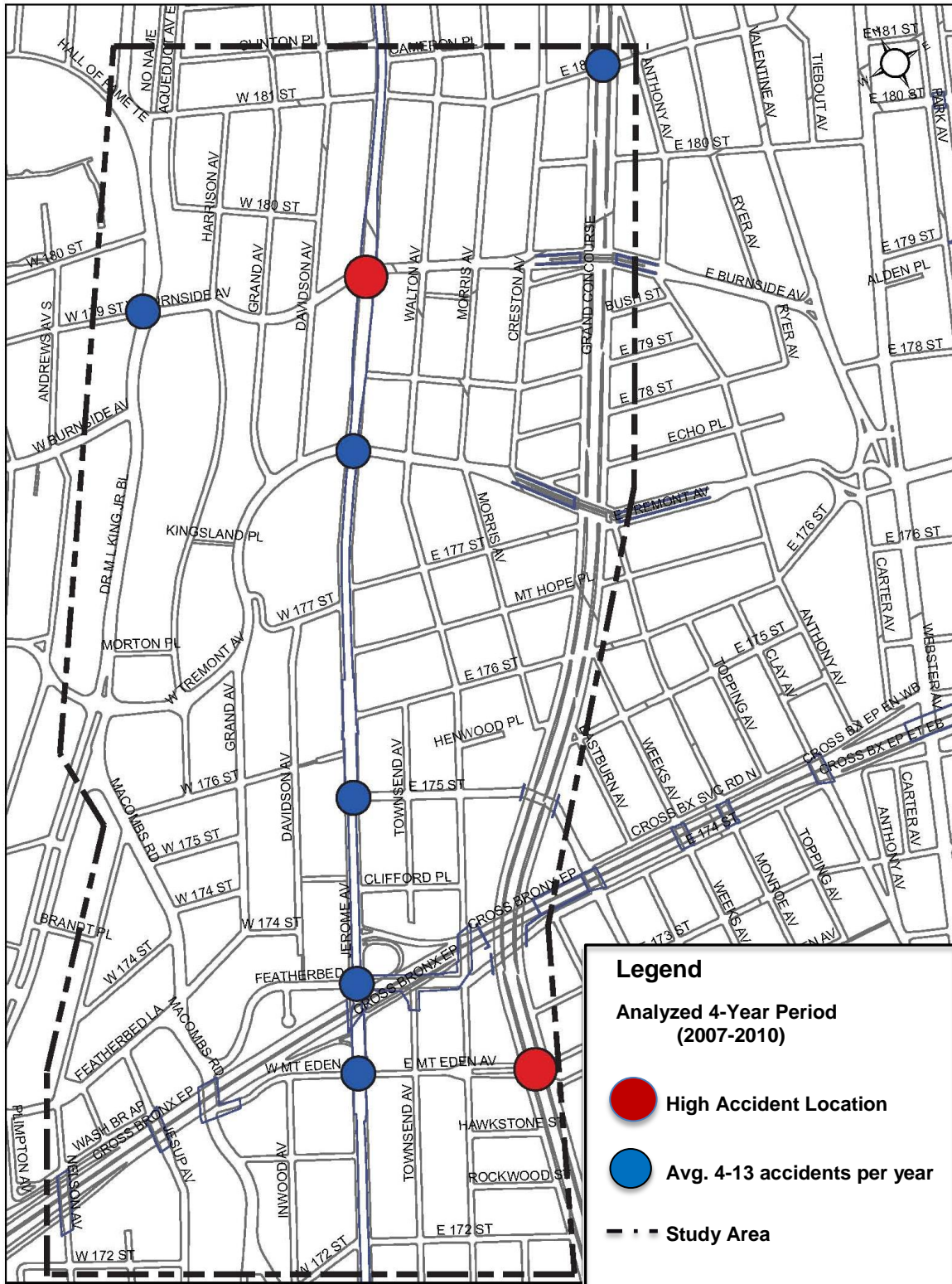


Table 6-2: Summary of Injuries (2007-2010)

Intersection	Total Injuries	Injury Type			
		A	B	C	PDO
	2007-2010				
Jerome Ave/Tremont Ave	71	8	1	62	6
Grand Concourse/E. Mt. Eden Ave/Parkway	55	3	6	46	10
Jerome Ave/174 th St/Featherbed Ln	55	2	3	50	15
Grand Concourse/E. 181 st Street	51	4	3	44	0
Jerome Ave/Mt. Eden Avenue	50	0	2	48	10
University Ave/W. Burnside Avenue	45	4	3	38	4
Jerome Ave/175 th Street	34	3	2	29	6
Jerome Ave/Burnside Avenue	26	1	2	23	2
Total	387*	25	22	340	53*

Type A – Person bleeding/carried away from scene; Type B – Bruises; Type C – No visible injuries; PDO – Property Damage Only (* – Total injuries does not include PDO).

Accidents by Collision Type and Driving Conditions

An analysis of the contributing factors to the accidents revealed that 40% of the accidents occurred during night time and 14% occurred under wet roadway conditions (rain or snow). The distribution of accident by collision types showed that 15% were **rear end**, 14% occurred due to **overtaking**, and 6% were **left-turn** accidents. In many instances (35% of the time) the collision type was not recorded; this translates into 106 out 306 accidents being rendered inconclusive with respect to collision type. The highest numbers of **rear end** accidents were recorded at the intersection of Jerome Avenue/ Tremont Avenue, where 10 were recorded. The highest number of accidents as a result of **overtaking** also occurred at this intersection. Below are the intersections where the highest number of **left-turn**, **rear end**, and **overtaking** accidents occurred. Figure 6-2 shows accidents by collision type and roadway conditions.

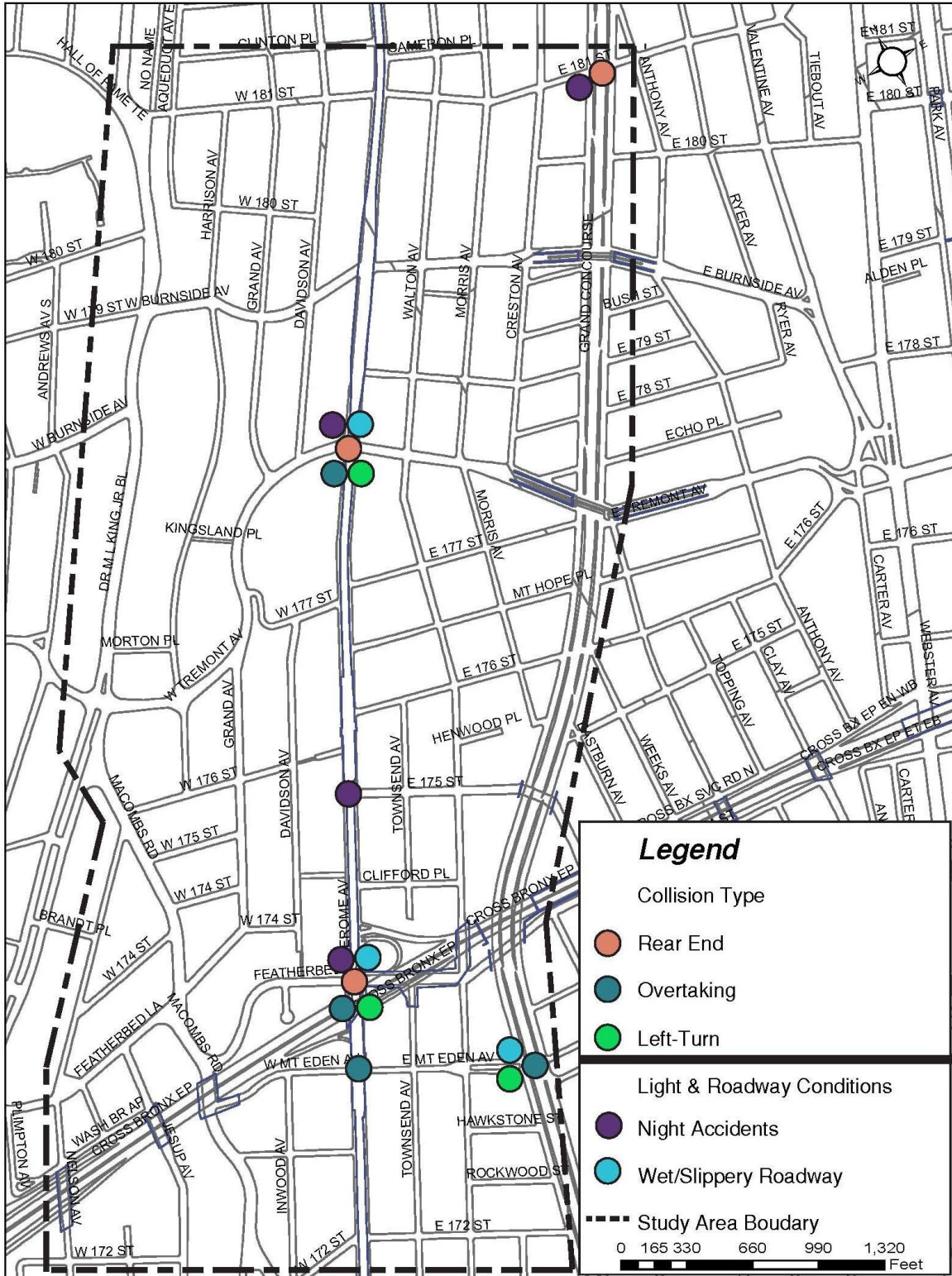
- **Rear End:**
 1. Jerome Avenue/E./W. Tremont Avenue (10)
 2. Grand Concourse/E. 181st Street (9)
 3. Jerome Avenue/E. 174th Street/Featherbed Lane (8)

- **Overtaking:**
 1. Jerome Avenue/E./W. Tremont Avenue (11)
 2. Jerome Avenue/E./W. Mt. Eden Avenue (8)
 3. Grand Concourse/Mt. Eden Avenue/Mt. Eden Parkway (8)
- **Left-Turn:**
 1. Jerome Avenue/E./W. Tremont Avenue (7)
 2. Jerome Avenue/E. 174th Street/Featherbed Lane (4)
 3. Grand Concourse/Mt. Eden Avenue/Mt. Eden Parkway (4)

A number of accidents that occurred during **night time** and under **wet road conditions** are listed below for the following locations:

- **Night time:**
 1. Jerome Avenue/E. 174th Street/Featherbed Lane (24)
 2. Jerome Avenue/E./W. Tremont Avenue (17)
 3. Jerome Avenue/E. 175th Street (16)
- **Wet roadway conditions:**
 1. Jerome Avenue/E.174th Street/Featherbed Lane (9)
 2. Jerome Avenue/E./W. Tremont Avenue (8)
 3. Grand Concourse/Mt. Eden Avenue/Mt. Eden Parkway (8)

Figure 6-2: Accidents by Collision Type



Traffic accidents are random occurrences; however, certain counter-measures can be implemented in order to improve overall operations that make an intersection less accident prone. Accidents can be reduced by using the standard countermeasures such as providing left turn slots, improving sight distance, removing obstructions, widening lanes, providing special phase for left turns, increasing amber time, installing larger lenses, providing pedestrian walk/don't walk indicators, installing count-down signals, reducing speed, improving signing and markings, installing advancing warning signs, improving roadway lighting, improving drainage, and prohibiting curb parking. Recommendations to improve overall safety conditions in the study area are integrated into the traffic improvement measures that include the following intersections: Jerome Avenue and Tremont/Burnside/Mt. Eden Avenues; Jerome Avenue/174th Street/Featherbed Lane; Grand Concourse and East Mt. Eden Avenue/E. 181st Street; Dr. Martin Luther King Boulevard and Tremont/Burnside Avenues, and Dr. Martin Luther King Boulevard and W. 181st Street/Hall of Fame.

7.0 PARKING

7.1 Introduction

Parking plays an important role in the overall transportation system. Inadequate parking could lead to unnecessary circulation as motorists search for parking spaces, or to illegal and double parking, thus reducing roadway capacity. This section examines the study area's parking demand and supply to identify parking deficiencies in an attempt to address the area's parking needs.

There are on-street and off-street parking facilities in the study area. On-street parking is generally permitted on all streets except where parking regulation prohibits. Off-street parking facilities are associated with large residential buildings as well as some commercial and entertainment establishments in the study area.

Surveys of on-street and off-street parking facilities were conducted along major corridors as well as minor streets during weekday 8:00-11:00 AM and 12:00-4:00 PM peak periods.

7.2 Off-Street Parking

An inventory of all accessible off-street parking facilities (lots and garages) in the study area was conducted. These include 22 off street public parking garages/lots and 22 accessories parking garages/lots. Figure 7-1 shows the locations of public off-street parking facilities and Table 7-1 lists the names, location, capacity, utilization and fee structure.

Public Parking

It is estimated that there are 1,629 public parking spaces in 22 facilities. The largest facility (250 spaces) is located on Jerome Avenue between Goble Place and Mount Eden Avenue. A facility with 195 spaces at Harrison Avenue and West 181st Street was the second largest. Three are three facilities with 100 spaces and all others have less than 75 parking spaces.

Observed utilization is about 75% during the midday (12-4PM). Off-street parking supply is adequate to satisfy the existing demand – a situation that is expected to continue in the future.

Accessory parking

Twenty two accessory parking facilities with a total of 392 parking spaces are located mostly alongside the major corridors such as Jerome, Walton, and Grand Avenues, and also along Macombs Road, Featherbed Lane, 181st Street, and Grand Concourse.

Of the 22 accessory parking lots in the study-area, 13 are used primarily for residential parking (236 spaces), four for commercial purposes (44 spaces), and five for institutional buildings (122 spaces) such as churches and community centers. Observed utilization is about 75% during the midday (12-4PM).

Table 7-2 lists the names, location, capacity, utilization and type of facilities while Figure 7-2 showed the locations of facilities in the study area.

Figure 7-1: Off-Street Public Parking Facilities

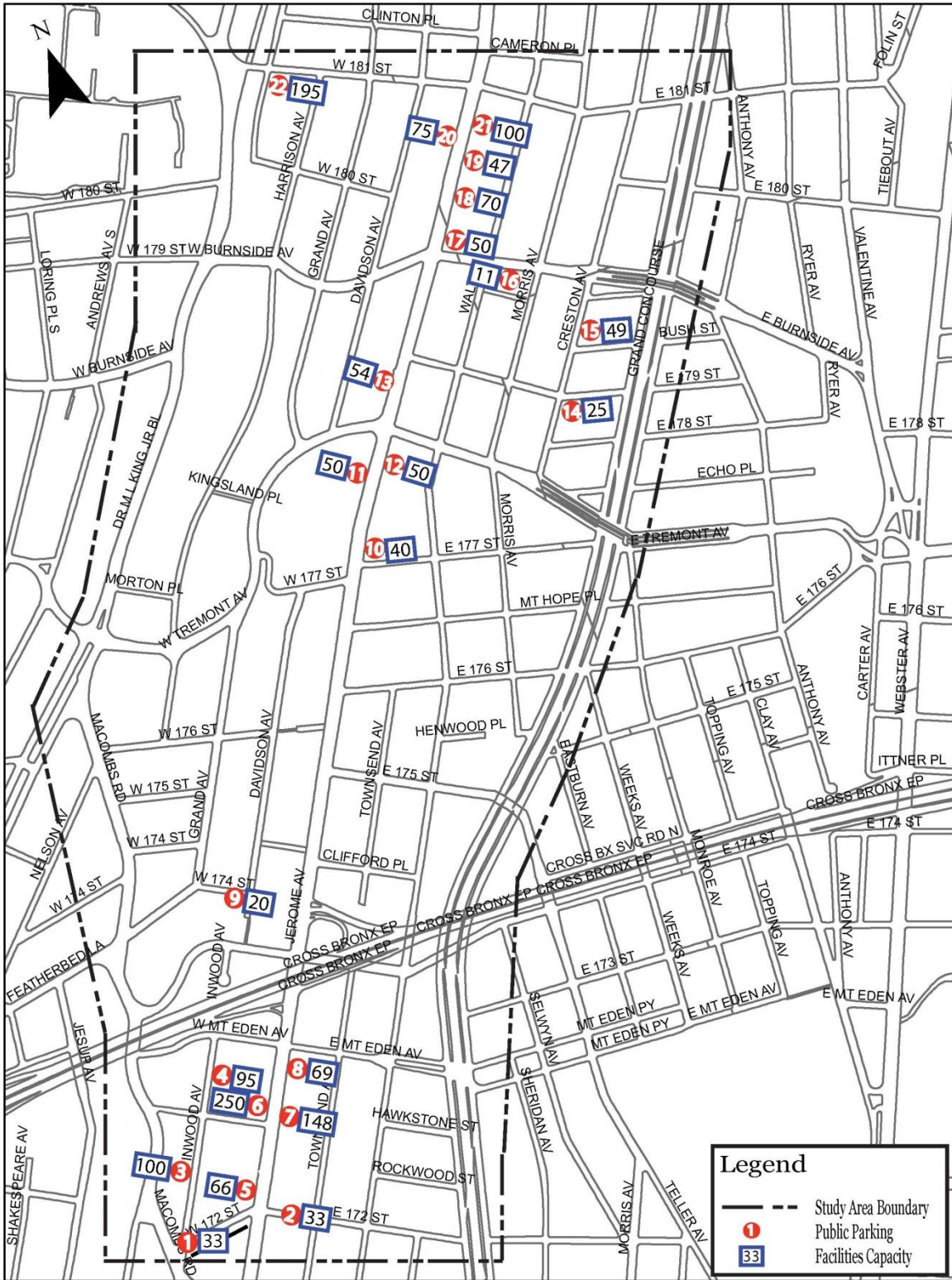


Table 7-1: Off-Street Public Parking Facilities

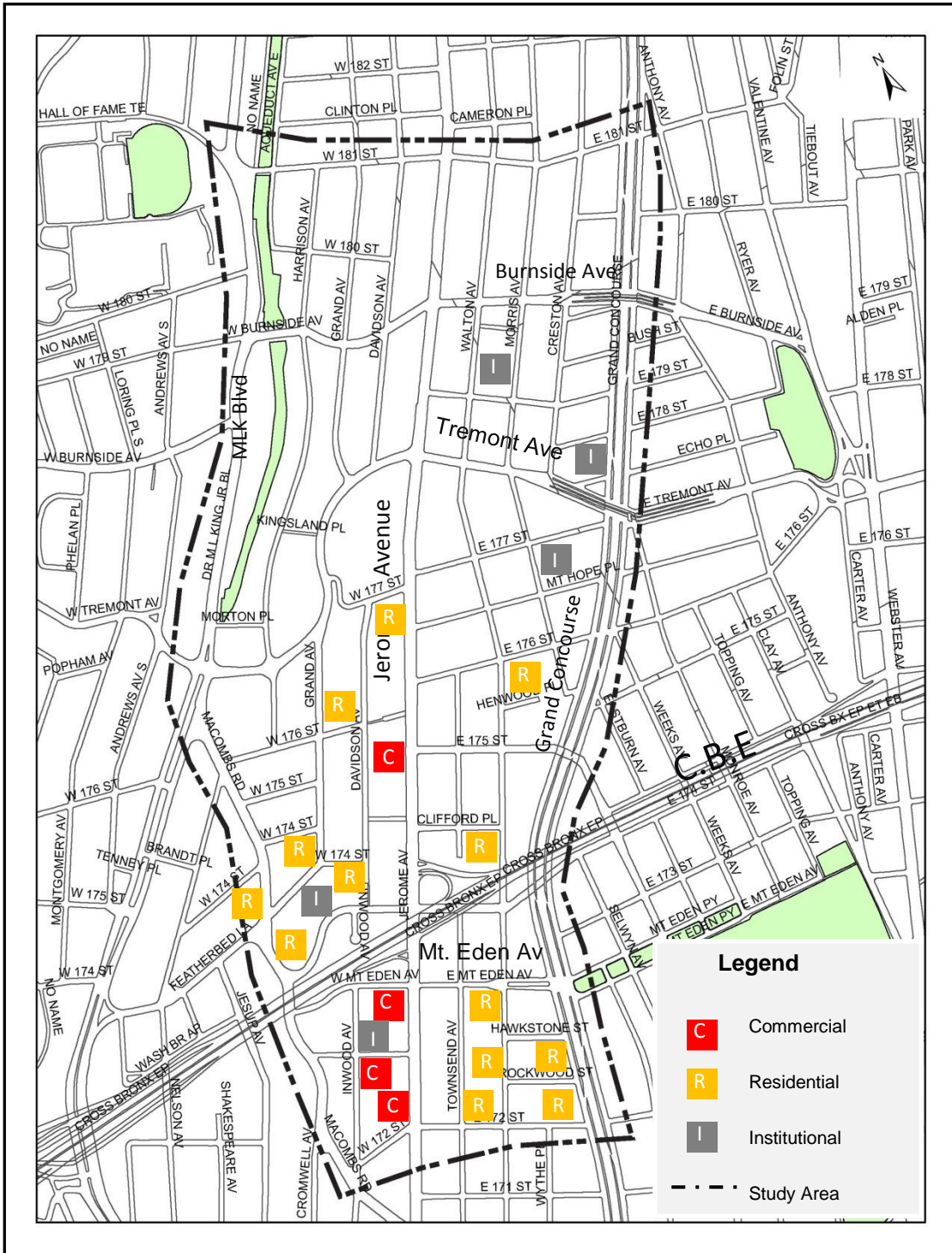
No.	Name of Public Lot/Garage	Location of Facility	License (#)	Capacity (#)	Utilization		Rate/fee (\$)
					(#)	(%)	
1	Gladys K. Fayne	1475-81 Macombs Rd	817886	32	23	72	(D) \$3.65 (N) \$5.50
2	110 Rockwood Street LLC	111 E. 172 nd Street	1077757	33	21	64	(D) \$5.00 (M) \$155
3	Jonathon & Gabriel Parking Lot	1521 Inwood Avenue	1134343	100	68	68	(D) \$5.00 (M) \$155
4	City Parking	1550 Inwood Avenue	1151512	95	68	72	(D) \$5/Hr (M) \$150
5	Jerome Avenue Parking Garage Inc.	1509 Jerome Avenue	1098960	66	57	86	N/A
6	1545 Parking LLC	1545 Jerome Avenue	1040945	250	234	94	(D) \$3.65 (N) \$5.50
7	Community Parking Inc.	1556-60 Jerome Avenue	1135542	148	82	55	\$7 (12Hrs) \$10 (24Hrs)
8	The GGG Parking Inc.	1565 Jerome Avenue	1128837	69	55	80	\$7 (12Hrs) 10 (24Hrs)
9	Draynib Corp	25 W. 174 Street	469978	20	12	60	\$6 (4Hrs) \$8 (24Hrs)
10	KRM Garage	1900 Jerome Avenue	1088937	40	29	73	\$7 (12hrs) \$9 (24hrs)
11	Estrella Reinaldo	1941 Jerome Avenue	996304	50	44	88	\$7 (12hrs) \$10 (24hrs)
12	Estrella Reinaldo	1961 Jerome Avenue	957524	50	39	78	\$6 (4hrs) \$8 (24hrs)
13	Estrella Reinaldo	1985 Jerome Avenue	1067182	54	32	59	\$7 (12hrs) \$9 (24hrs)
14	La Perla Parking	152 E. 179 th Street	1212126	25	24	96	\$7 (12hrs) \$9 (24hrs)
15	Central Parking Systems	2032 Creston Avenue	1200151	49	46	94	\$7 (12hrs) \$10 (24hrs)
16	Marand Realty Company LLC	6698 East Burnside Ave	944416	11	9	82	N/A
17	Candido Batista Enterprise	2064 Jerome Avenue	1022884	50	41	82	\$7 (12hrs) \$10 (24hrs)
18	Issac Parking Corp	2080 Jerome Avenue	1082044	70	48	69	\$7 (12hrs) \$8 (24hrs)
19	Jose J. Rivas	2102 Jerome Avenue	1135588	47	24	51	\$7 (12hrs) \$10 (24hrs)
20	NINI Enterprises	2125 Jerome Avenue	1148777	75	49	65	\$7 (12hrs) \$8 (24hrs)
21	Javier Rodriguez	2801 Jerome Avenue	1179976	100	80	80	\$7 (12hrs) \$10 (24hrs)
22	Westbury Realty LLC	508 West 181 st Street	1192584	195	147	74	N/A
Total				1,629	1,222	75	

Note: M-Monthly; D- Daily; N-Over night

Table 7-2: Accessory Parking Facilities

No	Name of Lot/Garage	Location of Facility	Capacity (#)	Utilization		Type of Parking
				(#)	(%)	
1	Private Lot	Inwood Ave & E. 172 Street	11	6	55	Commercial
2	McDonalds	Jerome & Mt. Eden Avenues	5	3	60	Commercial
3	Auto Zone	1551 Jerome Ave & Globe Place	18	12	67	Commercial
4	Dunkin Donuts	Jerome Avenue & 175 Street	10	7	70	Commercial
5	Hill House (DHS)	1616 Grand Ave & W. 174 Street	20	15	75	Institutional
6	First Ghana 7 th Day Adventist Church	45 Globe Place	10	8	80	Institutional
7	Residential Complex	32 W. 174 Street	15	11	73	Residential
8	Residential Complex	Macombs Rd & Grand Avenue	4	3	75	Residential
9	Residential Complex	W. 176 th Street & Grand Avenue	16	15	94	Residential
10	Residential Complex	1730 Davidson Avenue	20	17	85	Residential
11	Residential Complex	31 Featherbed Lane	8	4	50	Residential
12	Residential Complex	Walton Avenue & Henwood Place	14	12	86	Residential
13	Residential Complex	Walton Avenue b/w E. 174 th St. & Townsend Avenue	16	11	69	Residential
14	Residential Complex	Walton Avenue & Hawkstone Street	27	18	67	Residential
15	Residential Complex	1535 Walton Avenue	32	21	66	Residential
16	Residential Complex	Walton Avenue & Rockwood Street	5	5	100	Residential
17	Residential Complex	Hawkstone Avenue b/w Walton Ave & Grand Concourse	21	14	67	Residential
18	Residential Complex	Rockwood Avenue b/w Walton Ave & Grand Concourse	28	25	89	Residential
19	Residential Complex	W. 174 th Street & Davidson Avenue	20	12	60	Residential
20	Project Return	1865 Morris Avenue & E. 177 Street	41	33	80	Institutional
21	Theresa's Haven	1975 Creston Avenue E. 178 Street	39	34	87	Institutional
22	Episcopal Mission Society of New York	1980 Morris Avenue & E. 179 Street	12	8	67	Institutional
Total			392	294	75	

Figure 7-2: Accessory Parking Facilities



7.3 On-Street Parking

The on-street parking analysis focused on major corridors in the study area where commercial activities and high density residential uses are concentrated but also included some minor streets. Parking regulations in the area range from alternate side street cleaning to restricted parking on commercial streets (metered-parking, time restricted parking, no standing zones, bus stops, fire hydrants, authorized parking zones, and loading/unloading bays).

The parking survey documented parking accumulation by time of day on each block face. Figure 7-3 shows the on-street parking regulation codes. Table 7-3 provides a list of on-street parking regulation codes along the corridors/streets inventoried in the study area.

There were instances when parking demand exceed capacity, resulting in double parking especially along major commercial corridors such as Burnside Avenue and Jerome Avenue.

7.4 On-Street Parking Demand and Utilization

There are approximately 3600 on-street parking spaces in the study area. The average parking utilization reached 80% (2,874 spaces) during the midday peak hours (12-4 PM). Parking shortfalls were noticeable along some segments of Jerome Avenue, Burnside Avenue, Grand Concourse, Featherbed Lane, Dr. Martin Luther King Blvd and Mt. Eden Avenue where utilization exceeded 90% for most of day.

The corridors with generally higher parking demand are listed below:

- Dr. Martin Luther King Blvd between W. Tremont Avenue and West 181st Street.
- Jerome Avenue between 172nd Street and 181st Street.
- Grand Concourse between East 175th Street and East 181st Street.
- Burnside Avenue between Dr. MLK Blvd/University Avenue and Creston Avenue.
- Featherlane Road between Macombs Road and Walton Avenue.
- Mount Eden Avenue between Macombs Road and Grand Concourse.

Figure 7-3: On-Street Parking Regulation Codes

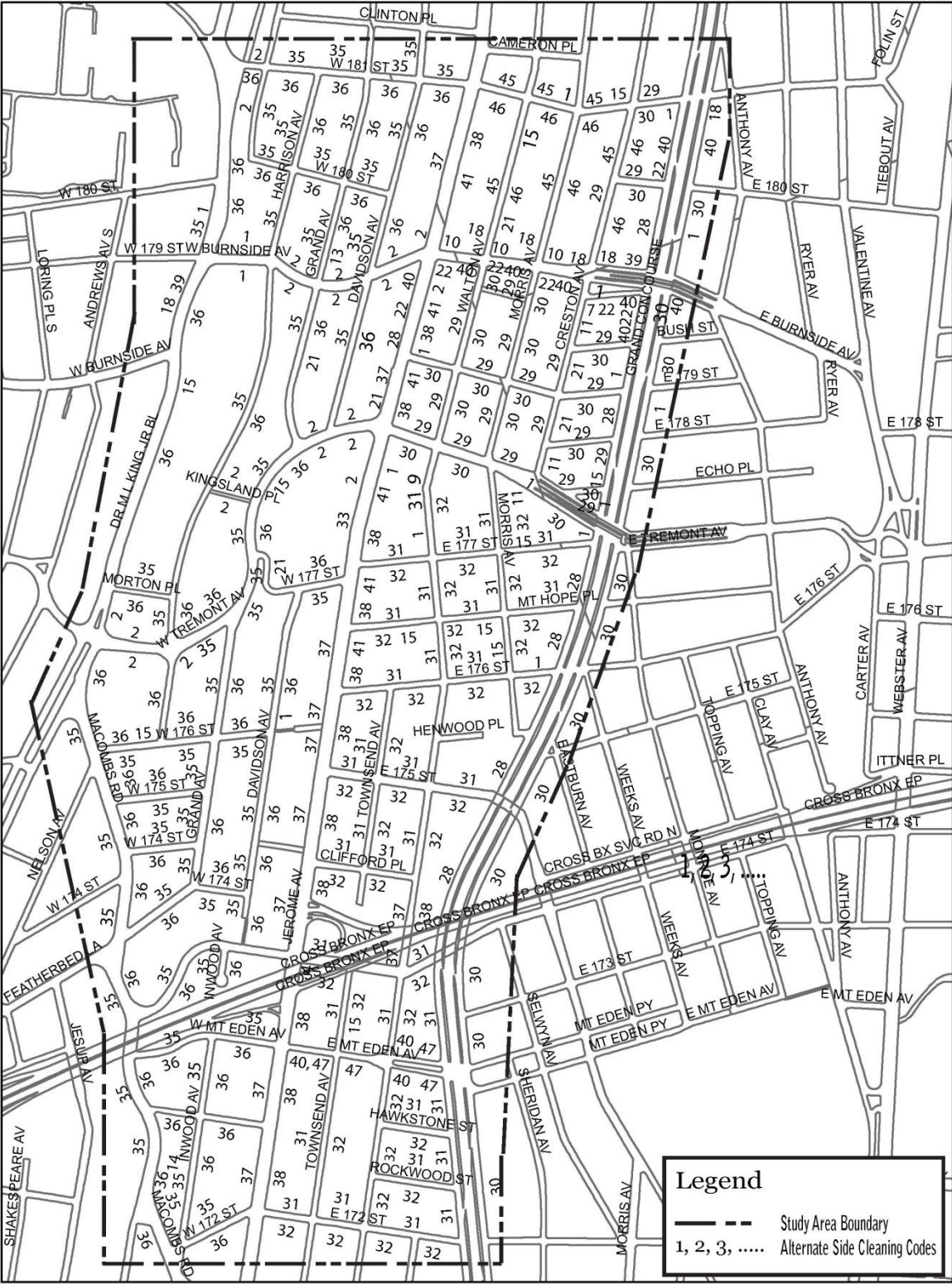


Table 7-3: On-Street Parking Regulations

No.	Description
1	No Parking Anytime
2	No Standing Anytime
3	No Standing 10PM-5AM including Sunday
4	No Standing Fire Zone
5	No Standing Except Trucks Loading/Unloading 10PM-5AM including Sunday
6	No Standing Anytime Except Trucks Loading/Unloading 6AM-6PM Mon-Fri
7	No Standing Anytime Except Trucks Loading/Unloading 7AM-7PM Mon-Fri
8	No Standing Anytime Except Authorized Vehicles
9	No Standing Anytime Taxi Stand
10	No Parking 7AM-4PM Mon-Fri
11	No Parking 8AM-6PM Except Sunday
12	No Standing 7-10AM & 4-6PM Mon-Fri
13	No Parking 7-10AM & 4-7PM Mon-Fri
14	No Parking 7:30-8AM Except Sunday
15	No Parking 7:30-8AM Mon & Thurs
16	No Parking 7:30-8AM Tues & Fri
17	No Parking 8-8:30AM Except Sunday
18	No Parking 8-8:30AM Mon & Thurs
19	No Parking 8-8:30AM Tues & Fri
20	No Parking 8:30-9AM Except Sunday
21	No Parking 8:30-9AM Mon & Thurs
22	No Parking 8:30-9AM Tues & Fri
23	No Parking 8-9:30AM Mon & Thurs
24	No Parking 8:30-10AM Mon & Thurs
25	No Parking 9:30-11AM Mon & Thurs
26	No Parking 9:30-11AM Tues & Fri
26	No Parking 9-10:30AM Tues-Fri
27	No Parking 11:30AM-1PM Mon-Fri
28	No Parking 11:30AM-1PM Mon & Thurs
29	No Parking 11:30-1PM Tues & Fri
30	1 Hour Parking 8AM to 7PM Except Sunday
31	1 Hour Parking 8:30AM to 7PM Except Sunday
32	1 Hour Parking 9AM to 7PM Except Sunday
33	2 Hour Parking 8AM to 7PM Except Sunday
34	2 Hour Parking 8:30AM-7PM Except Sunday
35	2 Hour Parking 9AM-7PM Except Sunday

7.5 Future Parking

Generally speaking, the parking supply is adequate to satisfy demand in the study area, but there are a few areas where commercial and automobile activities are concentrated that have parking shortfalls. Based on current demand in these areas and potential growth, the parking situation will persist. On-street parking utilization along major corridors such as Jerome Avenue, Grand Concourse, Macomb Road, and Mt. Eden Avenue is below existing capacity. It is anticipated that enough available spaces exist to satisfy future demand. As expected, future demand for on-street parking is expected to be higher primarily along and around Burnside Avenue, Tremont Avenue, and Jerome Avenue. The projected on-street utilization for the peak hours takes into account a 0.38% growth rate over 10 years. Muni-meters should be installed to increase parking turnover and satisfy demand for both trucks and autos along the major commercial corridors.

8.0 PUBLIC TRANSPORTATION

8.1 Introduction

Public transportation plays a key role in the transportation system of the study area. It is the predominant mode of travel for area residents. The study area is well served by public transportation with three subway lines and ten bus routes and a transit hub at Macombs Road, East 175 Street, Jerome Avenue and Grand Concourse. The Metropolitan Transportation Authority - New York City Transit (MTA - NYCT) operates bus and subway services within the study area.

8.2 Subway Service

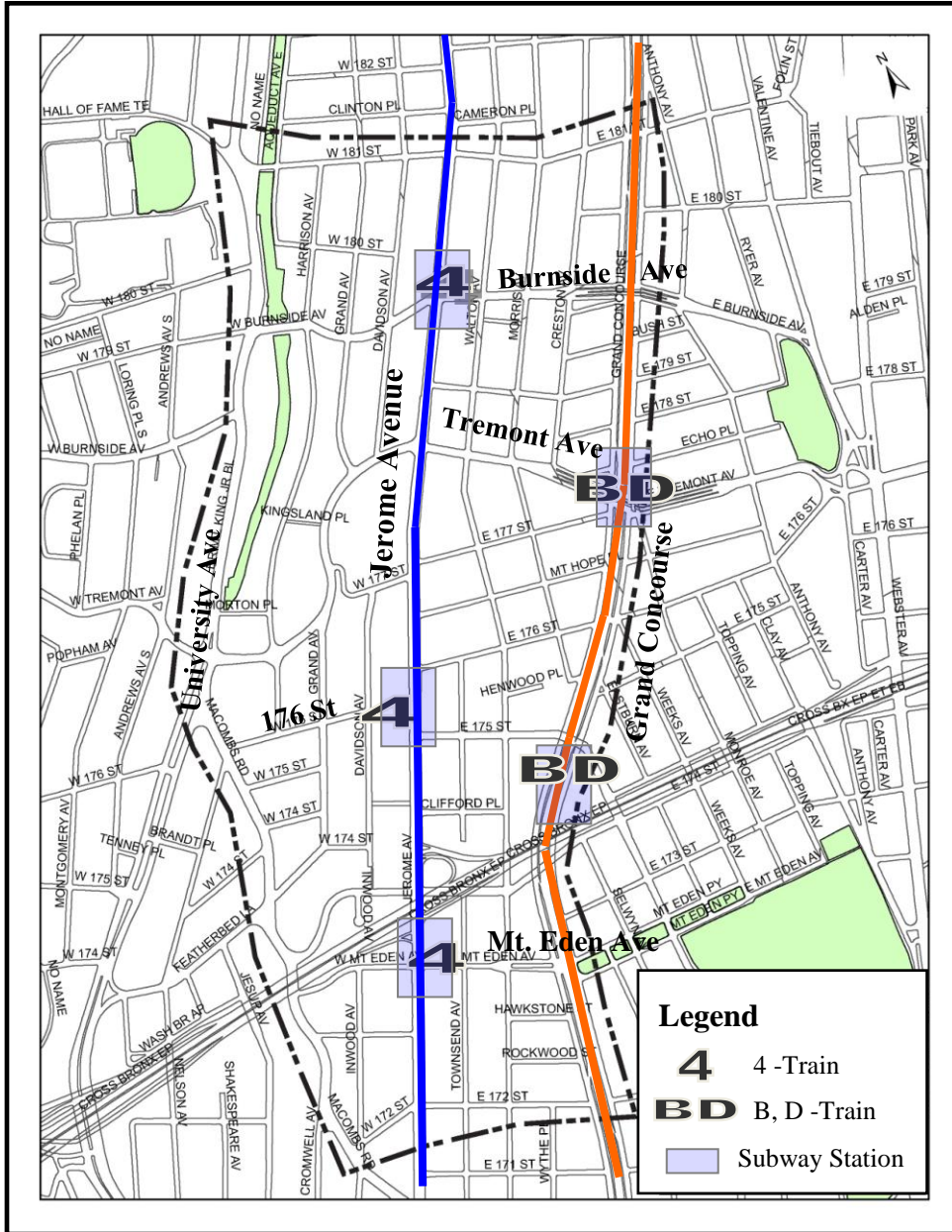
There are three subway lines along two routes that serve five subway stations. Table 8-1 below lists the subway lines/stations, while Figure 8-1 shows the subway lines and stations.

Table 8-1: Subway Lines and Stations

Lines	Routes	Stations
4 (Local)	Jerome Avenue	<ul style="list-style-type: none">• Mt Eden Avenue• 176 Street• Burnside Avenue
D or B (Local)	Grand Concourse	<ul style="list-style-type: none">• 174-175 Street• Tremont Avenue

The subway lines connect the study area and the Bronx to the boroughs of Manhattan and Brooklyn.

Figure 8-1: Subway Lines and Stations



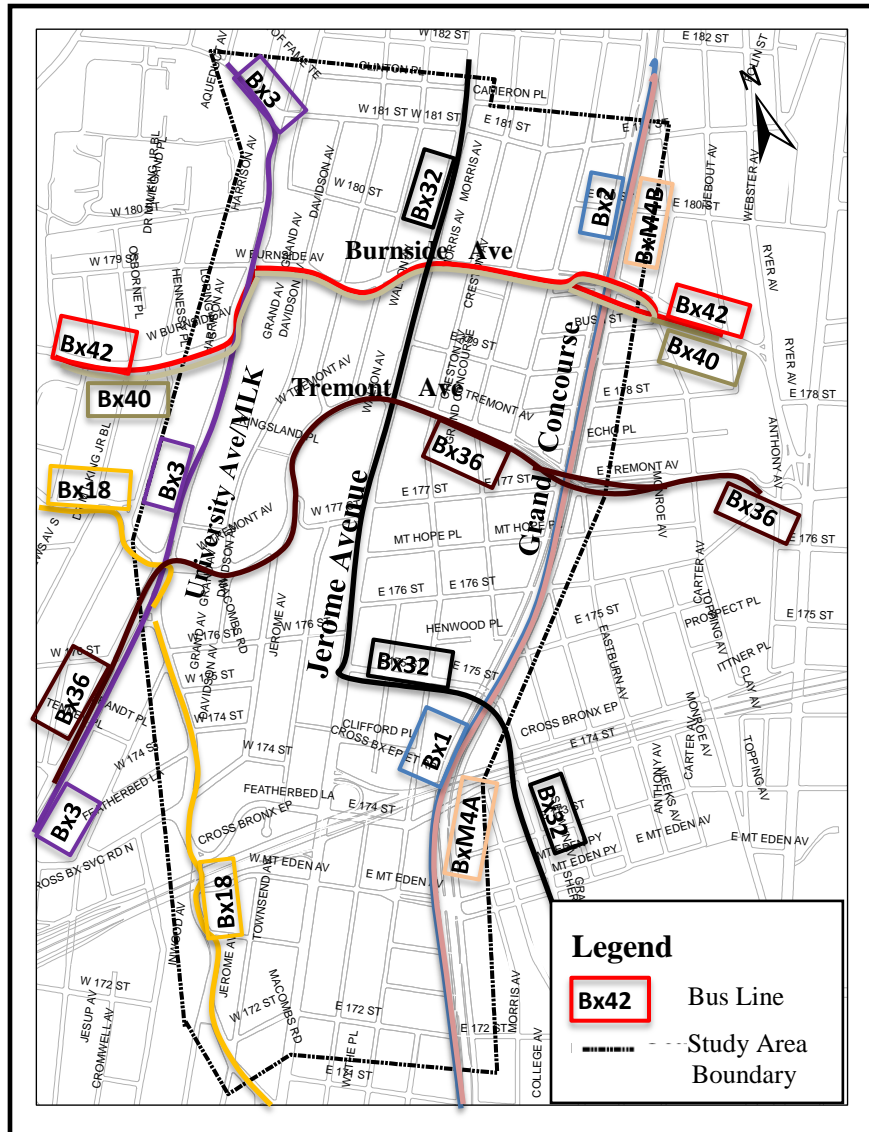
The following are descriptions of subway lines:

- The #4 subway service runs express on Lexington Avenue and along Jerome Avenue where it is elevated. It stops at the following stations: Mt. Eden Avenue, 176street, and Burnside Avenue at all times. It runs from New Lots Avenue (Brooklyn) to Woodlawn (Bronx).
- The D line extends from Coney Island (Brooklyn) to 205 Street (Bronx). The service runs express on Sixth Avenue and below Grand Concourse. It stops at the Tremont Avenue/Grand Concourse and at 174-175 Streets stations.
- Alternate to the D line is the B local, it runs express on Central Park West /Sixth Avenue and Grand Concourse (underground). It stops at the Tremont Avenue/Grand Concourse and at 174-175 Streets stations.

8.3 Bus Service

There are eight local and two express bus lines that serve the study area. The bus routes operate on five major corridors: Macombs Road/University Avenue, Jerome Avenue, Burnside Avenue, Tremont Avenue and Grand Concourse. There are three locations within the study area that can be considered as major transfer points: Jerome/Burnside Avenues, Jerome/Mt Eden Avenues, and Grand Concourse at East 170 Street/East Tremont Avenue where passengers from various bus lines transfer to the B/D or 4 trains and vice versa. The peak hours of bus operations selected for analysis were: 7-9AM, (11AM–1PM) midday, and 4-7PM. Figure 8-2 shows the bus lines in the study area.

Figure 8-2: Bus Lines



9.0 RECOMMENDATIONS

The analysis revealed several locations in the study area that can be improved with respect to traffic circulation, intersection and roadway configuration, signal timing, parking, signs and markings, truck loading/unloading zones, and streetscape. Exhibit 9.1 shows locations with improvement measures.

The following locations are identified for roadway and safety improvements:

1. University Avenue/Dr. Martin Luther King Boulevard and West Tremont Avenue (roadway striping, installing neckdowns and realigning x-walks, and signal timing changes);
2. Jerome Avenue and Burnside Avenue (parking removal, roadway restriping, and signal timing changes);
3. Jerome Avenue and CBE exit/entrance ramps (parking removal, roadway striping, enlargement of medians, installment of x-walk with pedestrian ramps, and signal timing changes);
4. Jerome Avenue and Featherbed Lane (parking removal, roadway striping, and signal timing changes);
5. Jerome Avenue and Mt. Eden Avenue (one-way conversion, parking removal, roadway striping, installing high visibility x-walks, and signal timing changes);
6. Mt. Eden Avenue and Walton Avenue (installing neckdowns with ADA ramps, enlarging medians, parking changes and roadway striping);
7. Dr. Martin Luther King Boulevard, from West Burnside Avenue to Hall of Fame/West 181st Street (pedestrian safety improvements including streetscape enhancement, roadway striping, sidewalk extension, installing crosswalks with pedestrian refuge, and signal timing changes);
8. Truck loading/unloading zones at Burnside Avenue, Tremont Avenue and Mt. Eden Avenue;
9. Signal timing modifications involving eleven intersections; and
10. Transit improvements for bus and subway services (bus stop relocation, skip stops).

Exhibit 9.1: Locations for Improvements

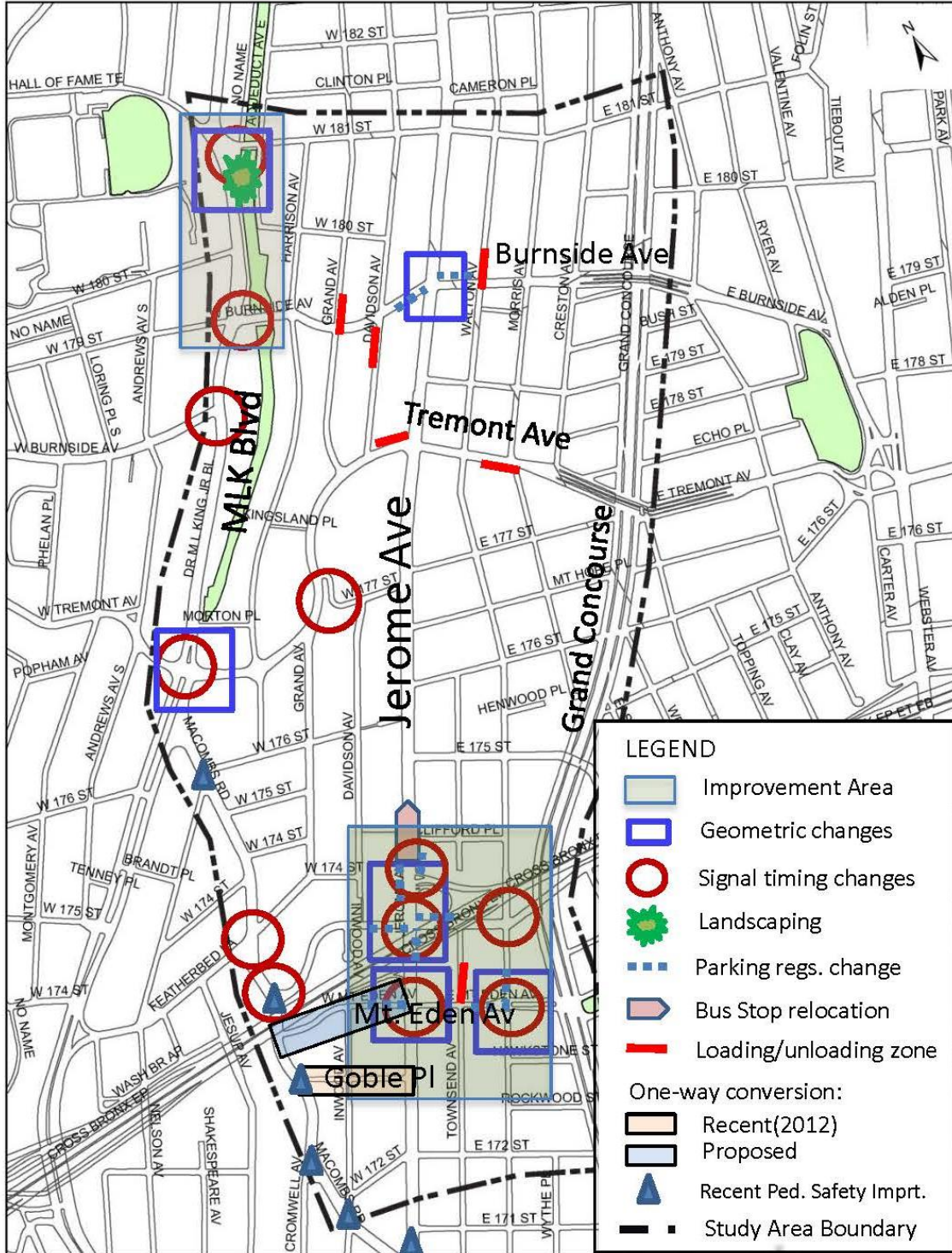


Exhibit 9-1 shows the locations for improvements and Table 9-1 lists the description of improvement measures.

Table 9-1: Proposed Improvement Measures

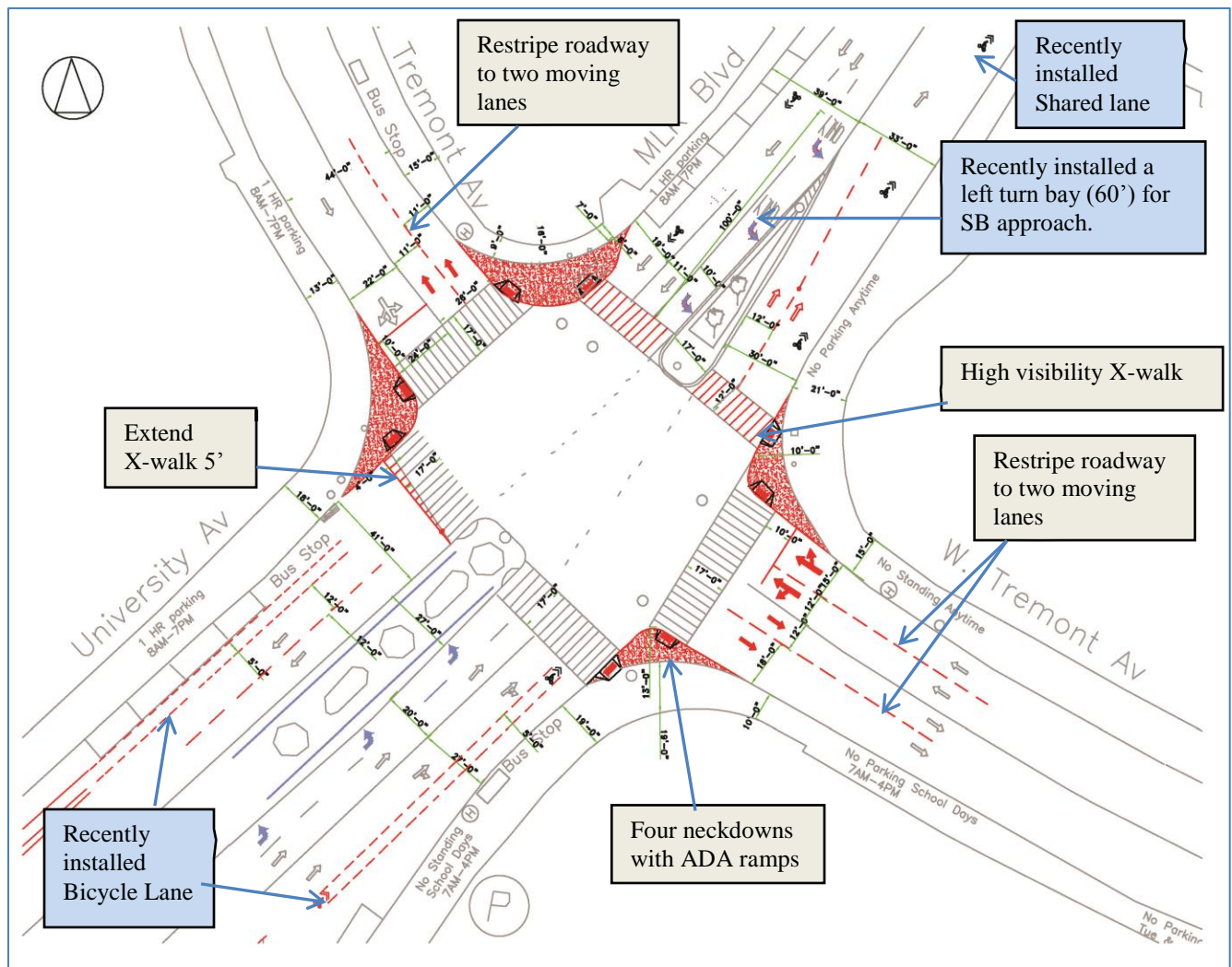
No.	Intersection/Area	Peak Period	Proposed Improvement Measures
1	Dr. MLK Blvd & W. Tremont Avenue	All Time Periods	Restripe W. Tremont Avenue to two moving lanes. Install four neckdowns. Shift 3 seconds from EB/WB phase to NB/SB phase during the MD & PM peak hours.
2	Jerome @ Burnside Avenues	All Time Periods	Restripe Burnside Avenue to provide two moving lanes. Install No Standing Anytime signs on both approaches of Burnside Avenue for 100 feet.
3	Jerome Ave @ CBE North side ramps	All Time Periods	Change signal phasing plan; introduce LT phase for Jerome Ave. SB approach, providing sufficient green time for vehicles entering CBE ramp (WB).
		All Time Periods	Enlarge medians and install crosswalks with pedestrian ramps b/w two entrance/exit ramps coming from/to CBE at Jerome Avenue.
4	Jerome Avenue @ Featherbed Lane	7AM-7PM	Restripe Featherbed Lane and provide two moving lanes in each direction. Install signs No Standing 7AM-7PM for 100 feet. Shift 2 seconds. from the NB/SB phase to EB/WB phase during all peak hours.
		7AM-7PM	Install No Standing 7AM-7PM signs for 100 feet; provide two moving lanes on Jerome Avenue b/w Mt. Eden Avenue and Featherbed Lane.
5	Jerome @ Mt. Eden Avenues (One-way conversion)	All Time Periods	Restripe Mt. Eden Avenue (EB) to provide two moving lanes (10') and install No Standing Anytime signs for 80'. Install high visibility x-walks and move Stop bar 10 feet from x-walks. Shift 3 seconds from the NB/SB phase to EB/WB phase during the all peak hours.
6	Walton @ Mt. Eden Avenues	All Time Periods	Enlarge two medians on Mt. Eden Ave; install 3 neckdowns; prohibit 4 parking spaces from west curb on Walton Ave. SB approach (4-7PM) and shift three seconds of green time from the EB/WB phase to SB phase in PM.
7	University Ave/Dr. MLK Blvd and W. Burnside Ave. (b/w W. 179 th & W. 181 st Streets.)	All Time Periods	Restripe Martin Luther King Blvd; widen medians and create pedestrian refuge. Landscape raised medians and realign sidewalks and crosswalks.
		All Time Periods	Shift 4 seconds of green time to the WB phase at the intersection of MLK Blvd and W. Burnside Avenue during the all peak hours.
	All Times	Refurbish all existing pavement markings, centerline, and crosswalks.	
	University Ave/MLK Blvd & W. 181st St.	All Time Periods	Shift 3 seconds of green time from the NB/SB phase to EB/WB phase during the AM, PM, & Saturday peak hours.
8	Truck loading/ unloading zones		Install truck loading/unloading zones along Burnside/Tremont and Mt.eden Avenues; Install No Standing Except Truck Loading/unloading from 10AM to 5 PM, with limit of 1 hour.
9	Walton Avenue @ E. 174 th Street	PM	• Shift 3 secs. of green time from the NB/SB phase to EB/WB phase
	W. Tremont @ Grand Avenues	PM	• Shift 4 secs. of green time from the EB/WB phase to NB/SB phase
10	Public Transit		Relocate bus stops at Jerome Avenue and 176th Street. Relocate bus stops at Jerome Avenue & 176 th St.
11	Bike lane proposal		As per the NYC Bicycle Master Plan, two new bike routes are proposed (along Tremont Av. and E. 181 St.). Shared lanes were recently marked along Macombs Road and Dr. MLK Blvd.
12	Pedestrian Safety improvements		Install medians with pedestrian refuge at four locations along Macombs Road. Implemented in 2012/13.

Detailed description of improvements follows.

1. University Avenue/Dr. MLK Boulevard and West Tremont Avenue

Construct curb extension with pedestrian ramps on all four corners. Restripe West Tremont Avenue to two moving lanes. Install high visibility crosswalk on the north leg of intersection (see Exhibit 9-2).

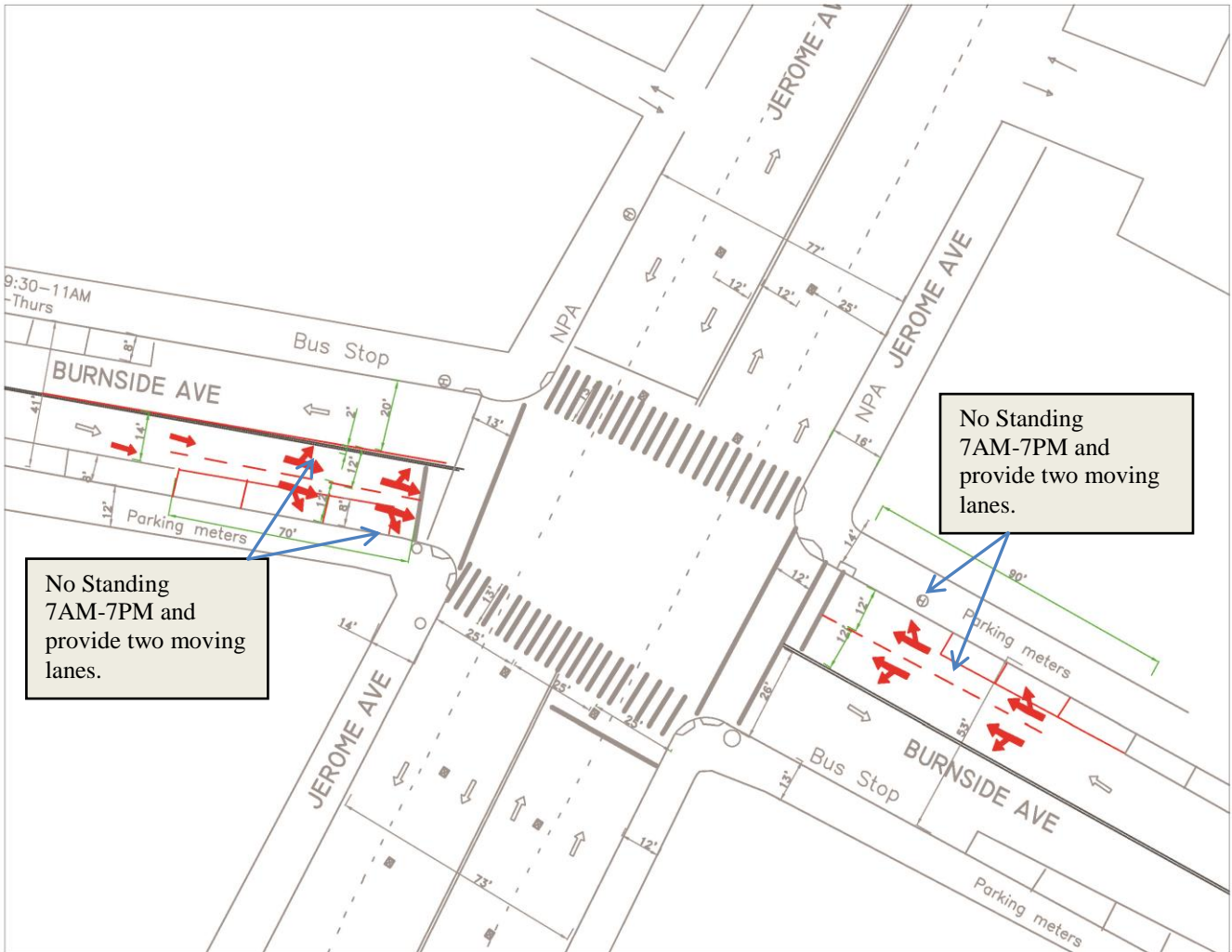
Exhibit 9-2
University Avenue/Dr. MLK Blvd and W. Tremont Avenue
Proposed Improvements



2. Jerome Avenue and Burnside Avenue

Remove three parking spaces on the eastbound and westbound approaches to provide two moving lanes and install No Standing 7 AM - 7 PM signs (See Exhibit 9-3).

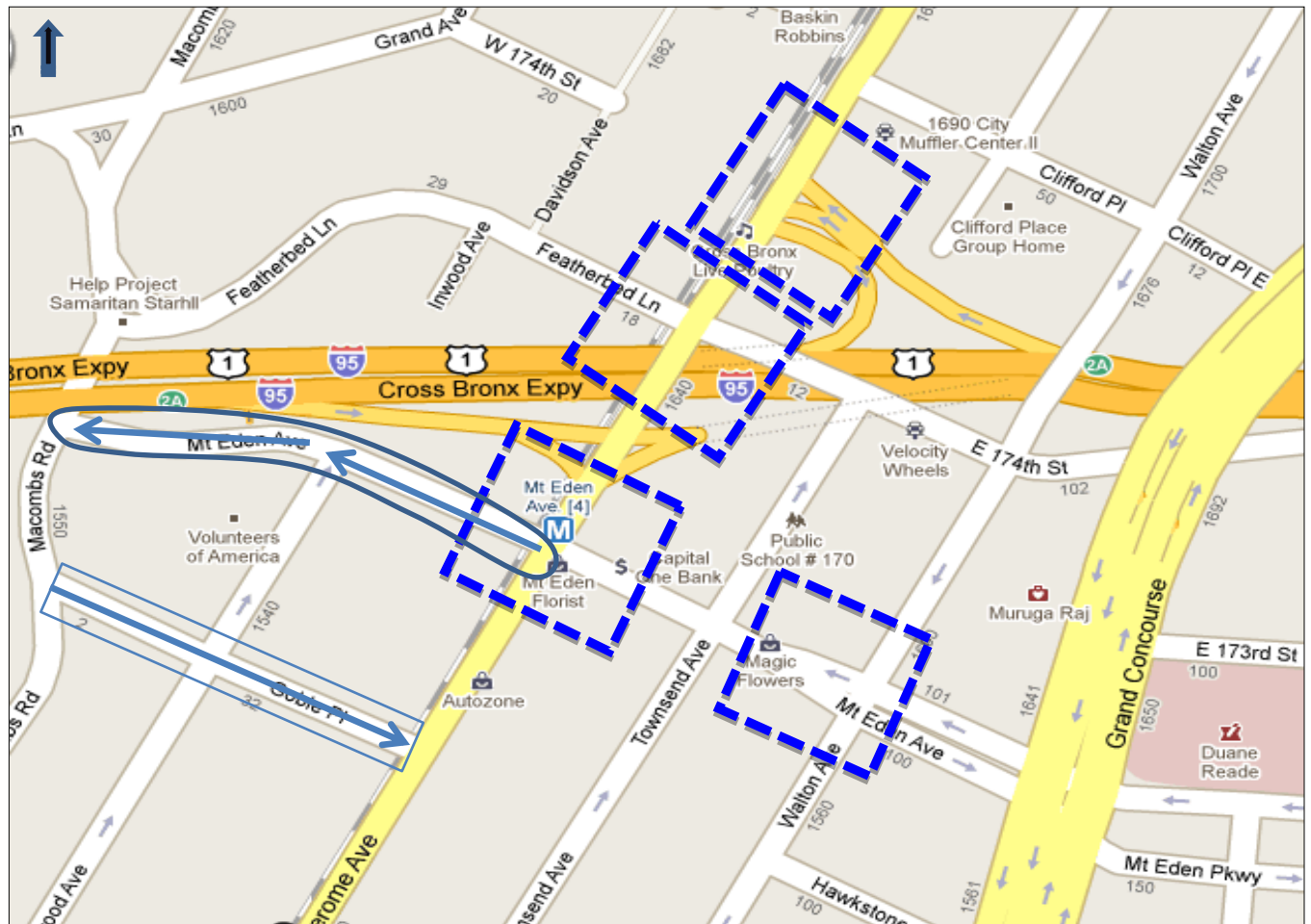
Exhibit 9-3
Jerome Avenue and Burnside Avenue
Proposed Improvements



3. Jerome Avenue and Cross Bronx Expressway (CBE) interchange

Jerome Avenue and Cross Bronx Expressway interchange is the most complex location in the study area with several connecting local streets and ramps where heavy congestion occurs most of the day. Exhibit 9-4 shows locations where congestion exists.

Exhibit 9-4
Jerome Avenue and Cross Bronx Expressway Interchange
Locations for Improvement



Note: See detail drawings next

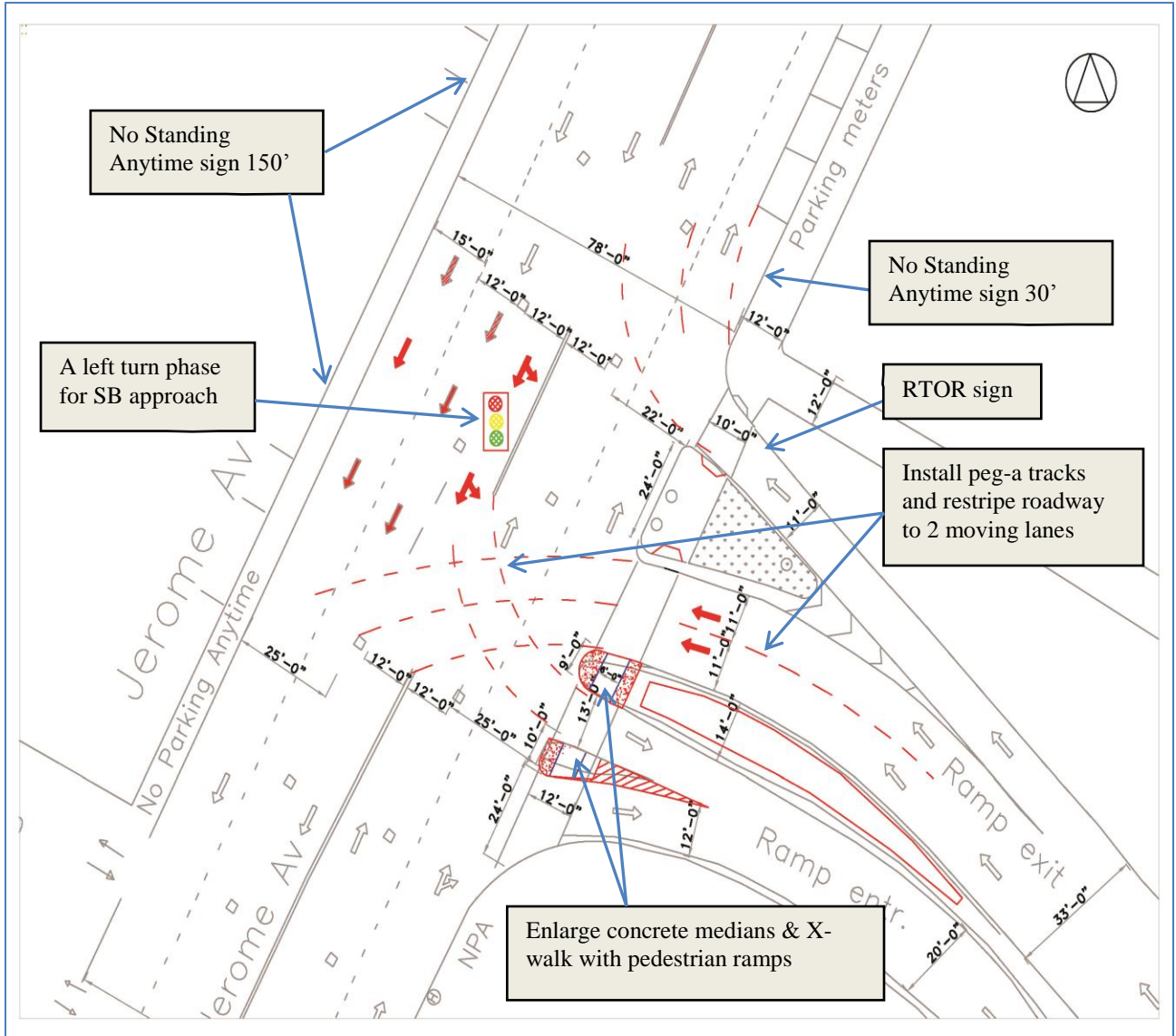
← One-way conversion

Overall traffic circulation and safety at these locations can be enhanced by the following improvement measures:

- Provide an exclusive SB left turn phase on Jerome Avenue to the CBE exit/entrance ramps (north side);
- Allow “*right turn on red*” (RTOR), for the westbound exit ramp onto Jerome Avenue northbound; remove one parking space on the east curb at the corner of northeast exit ramp and install a No Standing Anytime sign;
- Enlarge concrete medians between entrance and exit ramps north side and provide crosswalk with pedestrian ramps;
- Install peg-a-tracks to delineate roadways between Jerome Avenue and entrance/exit ramps (north side);
- Install No Standing Anytime signs along the west curb of the intersection; and
- Install advisory signs and pavement markings on Jerome Avenue to direct drivers to the CBE entrance or exit ramp.

See Exhibit 9-5 for details.

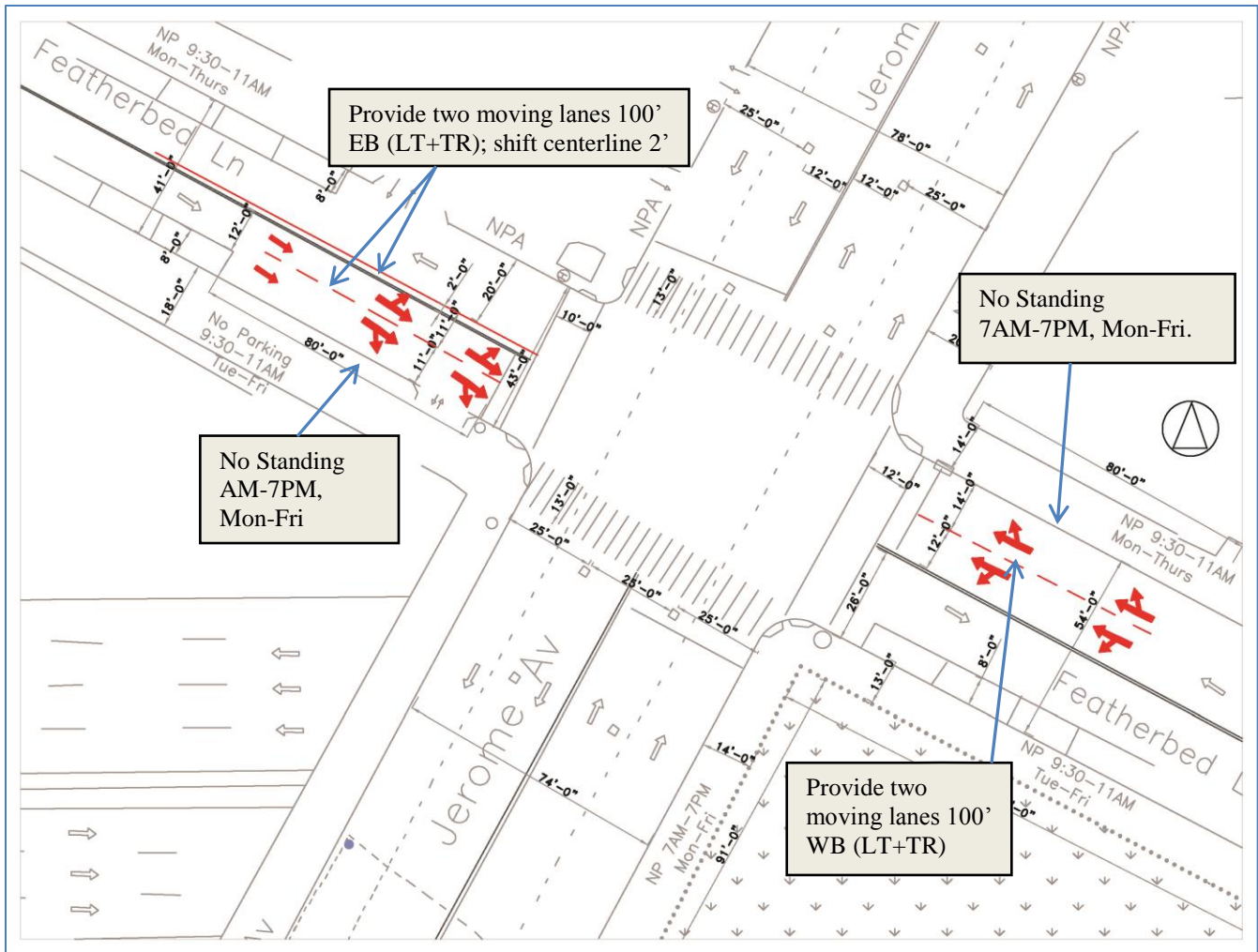
Exhibit 9-5
Jerome Avenue and CBE exit/entrance ramps
Proposed Improvements



4. Jerome Avenue and Featherbed Lane

Remove five parking spaces on the east and west approaches (north and south curbs) to provide two moving lanes (LT+TR) and install No Standing 7 AM-7 PM Monday-Friday (see Exhibit 9-6).

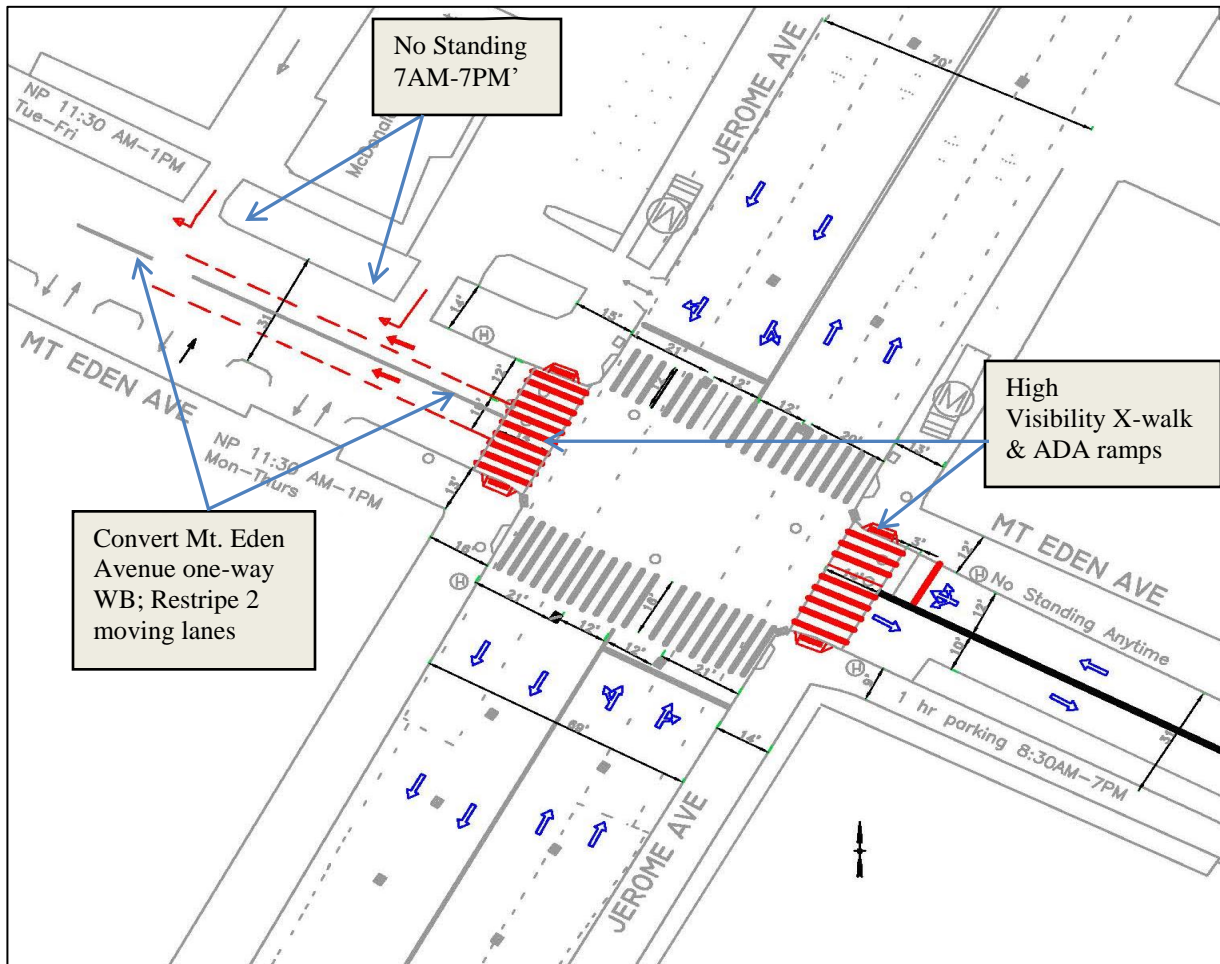
Exhibit 9-6
Jerome Avenue and Featherbed Lane
Proposed Improvements



5. Jerome Avenue and Mt. Eden Avenue

- Convert Mt. Eden Avenue to one-way westbound from Jerome Avenue to Macombs Road and provide two moving lanes.
- Install high visibility crosswalks with pedestrian ramps on Mt Eden Avenue; and
- Remove two parking spaces on the north curb of Mt. Eden Avenue, between Mc Donald's driveways, and install No Standing 7AM-7PM signs (see Exhibit 9-7).

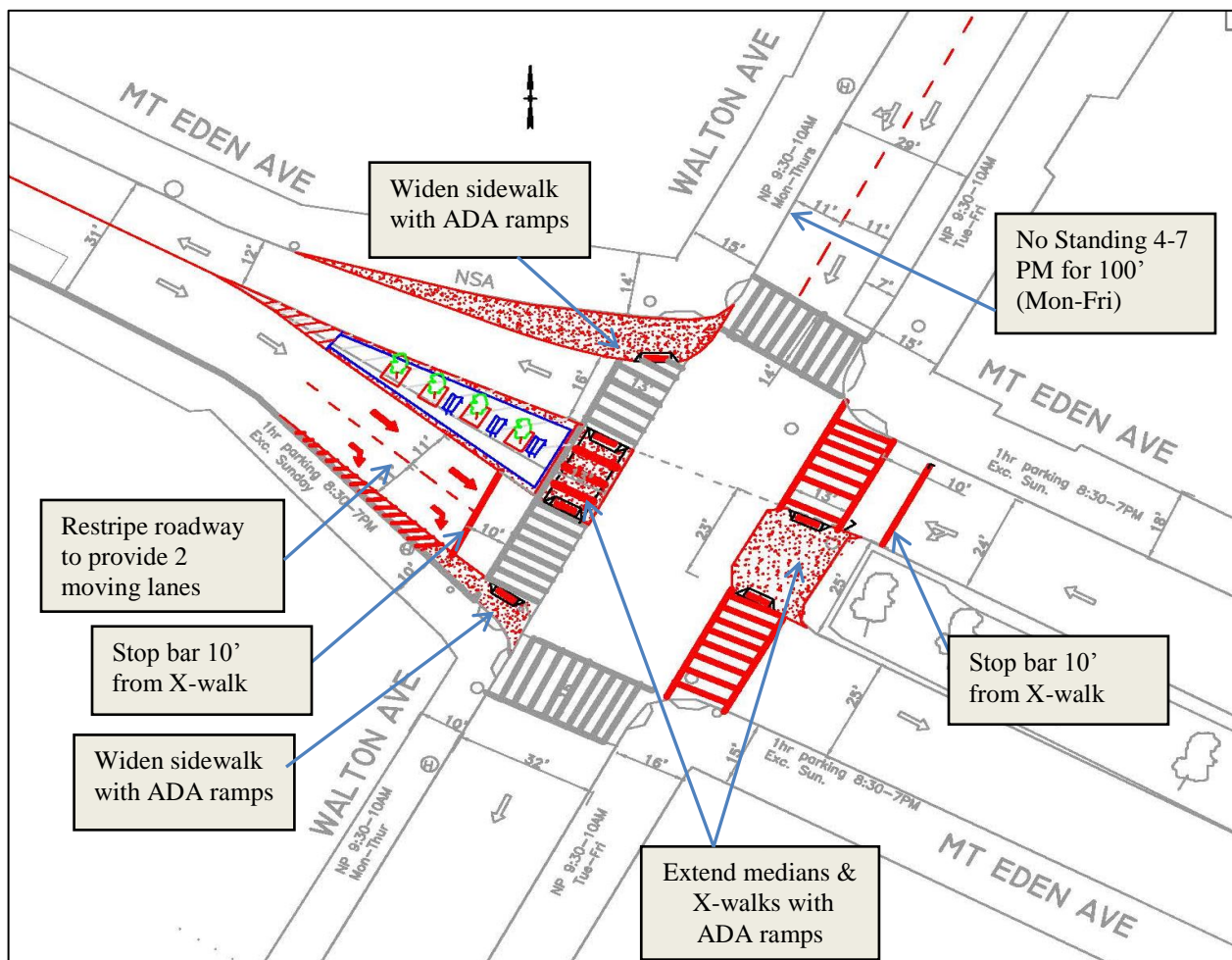
Exhibit 9-7
Jerome Avenue and Mt. Eden Avenue
Proposed Improvements



6. Walton Avenue and East Mt. Eden Avenue

- Install No Standing Anytime 100 feet on Mt. Eden Avenue west leg on the both curbs and restripe two eastbound lanes;
- Install No Standing 4-7 PM (Monday-Friday) 100 feet on Walton Avenue on the west curb (southbound approach) and provide two moving lanes;
- Extend sidewalk and center medians on Mt. Eden Avenue with pedestrian ramps. Landscape medians (see Exhibit 9-8).

**Exhibit 9-8
Walton Avenue and East Mt. Eden Avenue
Proposed Improvements**



7. Dr. Martin Luther King Boulevard/University Avenue Improvements

NYC Transit, Department of City Planning and the Bronx Borough President Office requested DOT to develop solutions to enhance pedestrian safety along Dr. Martin Luther King (MLK) Boulevard, between West 179th Street/West Burnside Avenue and East 181st Street. The recommendations prepared by Parks Department and DOT provide additional space for pedestrians, enlarge medians, landscaping, and adding refuge for four crosswalks along this segment (see Exhibits 9-9 and 9-10).

Exhibit 9-9

Dr. MLK Boulevard and E. 181st Street/Hall of Fame Terrace Proposed Segment for Improvement

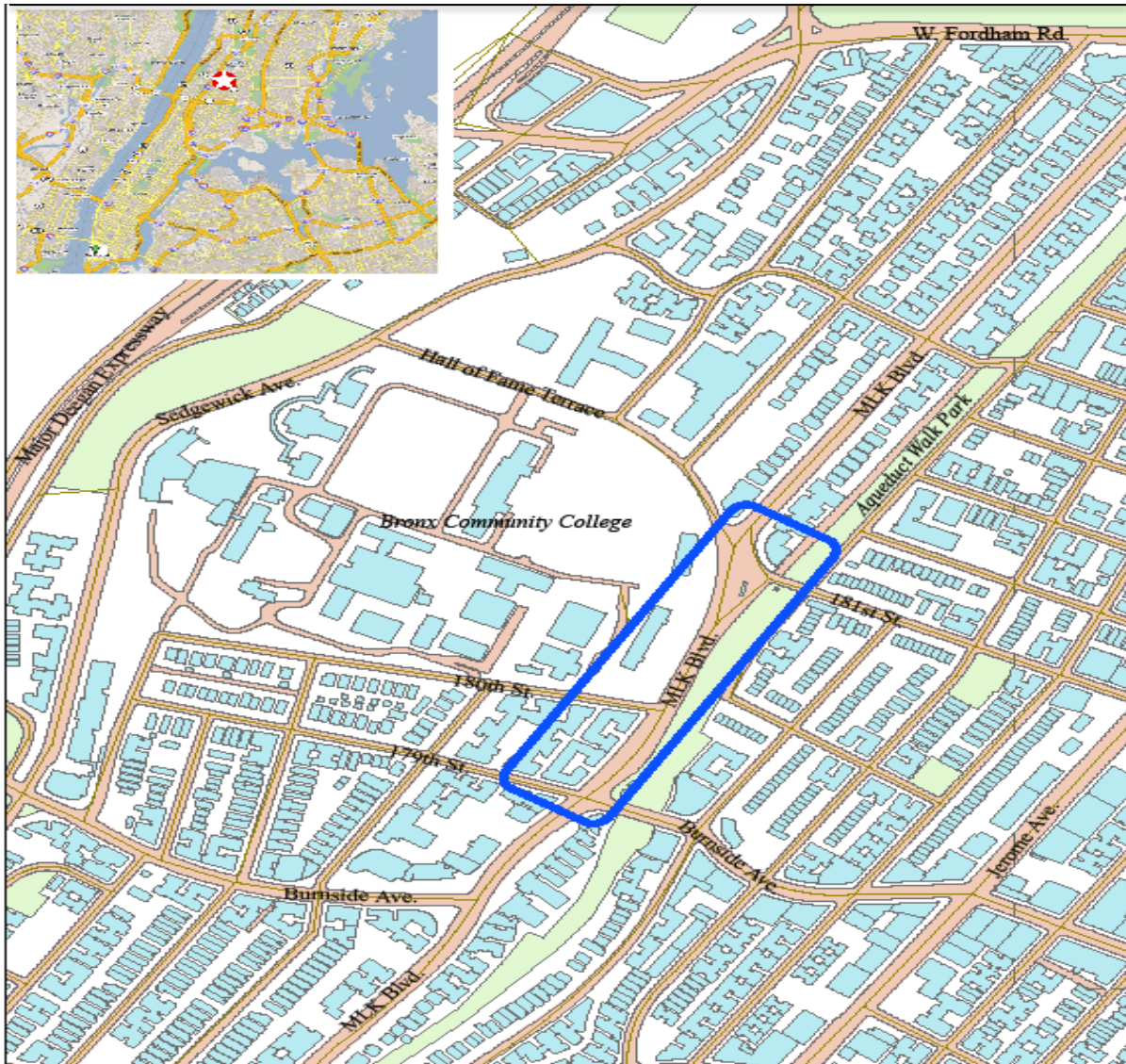
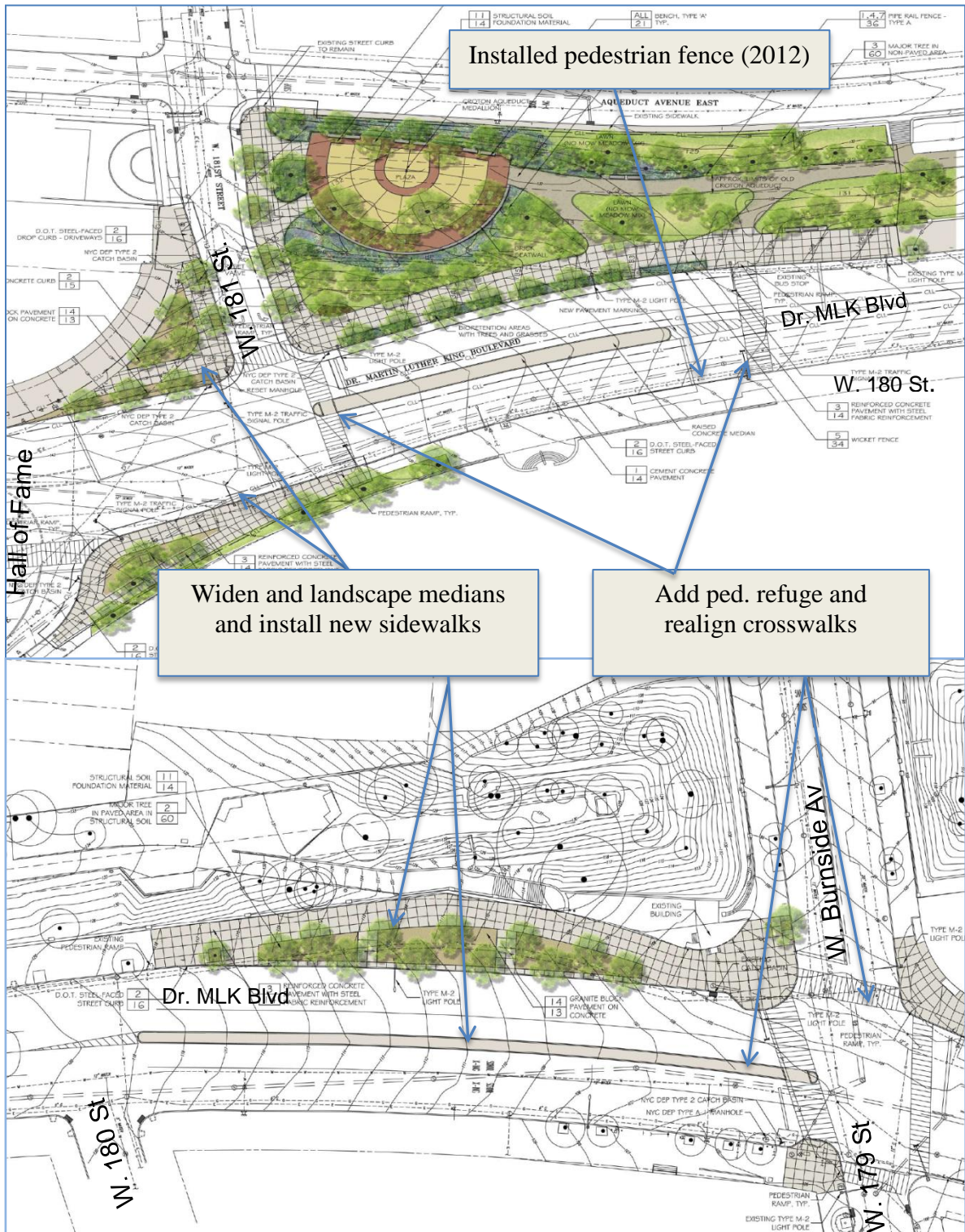


Exhibit 9-10
Dr. MLK Boulevard and E. 181st Street/Hall of Fame Terrace
Proposed Streetscape Enhancement



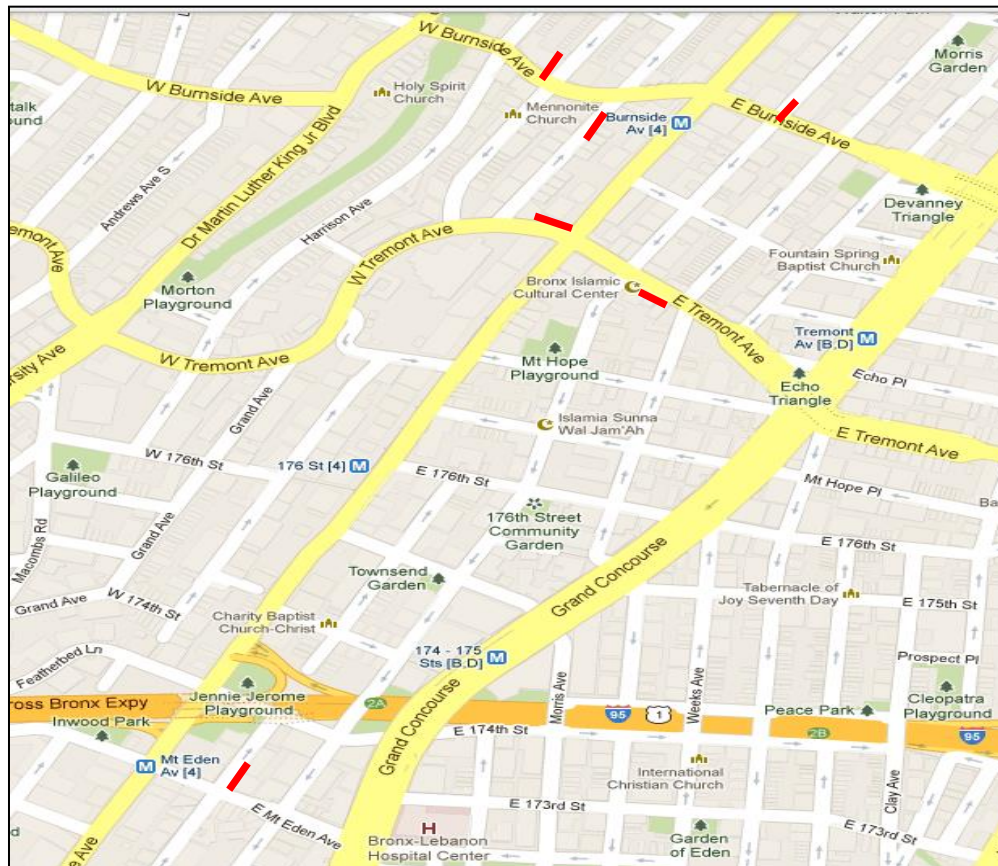
Joint Proposal - Dept. of Parks and Recreation/ DDC and DOT

8. Proposed Truck loading/unloading zones

There are a few commercial corridors in the study area with intense truck loading and unloading activities causing double parking hence it is recommended that six loading/unloading zones be installed at the following locations (see Exhibit 9-11):

1. Burnside Avenue @
 - a. Walton Avenue, northeast curb
 - b. Davidson Avenue, southeast curb
 - c. Grand Avenue, northeast curb
2. Tremont Avenue
 - a) Between Davidson & Jerome Avenues, north curb
 - b) Between Walton and Morris Avenues, south curb
3. Mt. Eden Avenue
 - a) Townsend Avenue, northeast curb

Exhibit 9-11: Proposed locations for truck loading/unloading zones



9. Proposed Signal Timing Changes

To improve traffic operations at various locations, signal timing modifications are recommended for the following intersections:

1. Jerome Avenue and Featherbed Lane/174th Street (AM and PM);
2. Jerome Avenue and CBE north ramps WB (AM, MD, PM, and SAT);
3. Walton Avenue and E. 174th Street (AM and PM);
4. Walton Avenue and E. Mt. Eden Avenue (AM & PM);
5. Macombs Road and Grand Avenue (PM);
6. Grand Avenue and W. Tremont Avenue (PM);
7. University Avenue/MLK Blvd and W. Burnside Avenue/W.179th St. (PM);
8. University Ave./MLK Blvd and W. Burnside Ave. (AM, MD, PM, and SAT);
9. University Avenue/MLK Blvd and W. 181st Street (AM, PM, and SAT);
10. University Avenue/MLK Blvd and Hall of Fame Terrace (AM and PM); and
11. University Avenue/MLK Blvd and W. Tremont Avenue (MD and PM).

Jerome Avenue and Featherbed Lane/174th Street (AM and PM)

During the AM and PM peak hours shift two seconds of green time from the NB/SB phase to the EB/WB phase. The LOS during the AM and PM peaks would be improved from E to D and delays reduced to 53/45 and 54/47 seconds from 70/61 and 73/66 seconds, respectively.

Jerome Avenue and CBE north ramps (All Times)

At Jerome Avenue and the north entrance/exit ramps introduce a 15 seconds left turn phase for Jerome Avenue southbound approach for left turns onto the entrance ramp. The LOS during the AM and PM peak hours would be improved from E to D and delays reduced to 45 and 49.6 from 59.7 and 68.7 seconds.

Walton Avenue and E. 174th Street (AM and PM)

During the AM and PM peak hours shift three seconds of green time from the SB phase to the EB/WB phase. The LOS during the AM and PM peaks would improve from E and F to D

and delays reduced to 45/50 and 31 seconds from 69/78 and 78 seconds, for the EB/WB approaches, respectively.

Walton Avenue and E. Mt. Eden Avenue (AM and PM)

During the AM and PM peak hours shift three seconds of green time from the EB/WB phase to the SB phase. The LOS during the AM and PM peak hours would improve from E to D and delays reduced to 44 and 51 seconds from 69 and 73 seconds, respectively.

Macombs Road and Grand Avenue (PM)

During the PM peak hour shift three seconds of green time from the NB/SB phase to the EB/WB phase. The LOS during the PM peak hour would improve from E to D and delays reduced to 40 seconds from 74 seconds, respectively.

Grand Avenue and West Tremont Avenue (PM)

During the PM peak hour shift four seconds of green time from the EB/WB phase to the NB phase. The LOS for the PM peak would improve from E to D and delay reduced to 54 seconds from 71 seconds, respectively.

University Avenue/MLK Blvd and W. Burnside Avenue (PM)

During the PM peak hour shift three seconds of green time from the pedestrian clearance phase to the NB/SB phase. The LOS for the PM peak hour would improve from E to D and delay reduced to 29 seconds from 77 seconds, respectively.

University Ave./MLK Blvd and W. Burnside Ave./W. 179th St. (AM, MD, PM, & SAT)

During the AM, midday, and PM peak hours shift two seconds of green time from the NB/SB to the WB phase and three seconds of green time for the Saturday midday peak. The LOS during the AM, midday, PM, Saturday midday peaks would improve from E/F to D and delays reduced to 45, 44, 54 and 45 seconds from 72, 73, 88 and 75 seconds, respectively.

University Avenue/MLK Blvd and W. 181st Street (AM, PM, and SAT)

During the AM, PM and Saturday midday peak hours shift three seconds of green time from the NB/SB to the WB phase. The LOS during the AM, PM, and Saturday midday peak hours would improve from E to D and delays reduced to 46, 49 and 52 seconds from 77, 76 and 66 seconds, respectively.

University Avenue/MLK Blvd and Hall of Fame Terrace (AM and PM)

During the AM and PM peak hours shift three seconds of green time from the NB/SB to the EB phase. The LOS during the AM and PM peak hours would improve to D from E and delays reduced to 54 and 53 seconds from 79.8 and 77 seconds, respectively.

University Avenue/MLK Blvd and W. Tremont Avenue (MD and PM)

During the midday and PM peak hours shift three seconds of green time from the EB/WB phase to the NB/SB phase. The LOS during the midday and PM peak hours would be improved to C/D from E/F and delays reduced to 30 and 50 seconds from 61 and 96 seconds, respectively.

10. Proposed Transit Improvements

Buses:

NYC Transit (Buses) proposes relocation of bus stops at Jerome Avenue and 176th Street. There are two proposals:

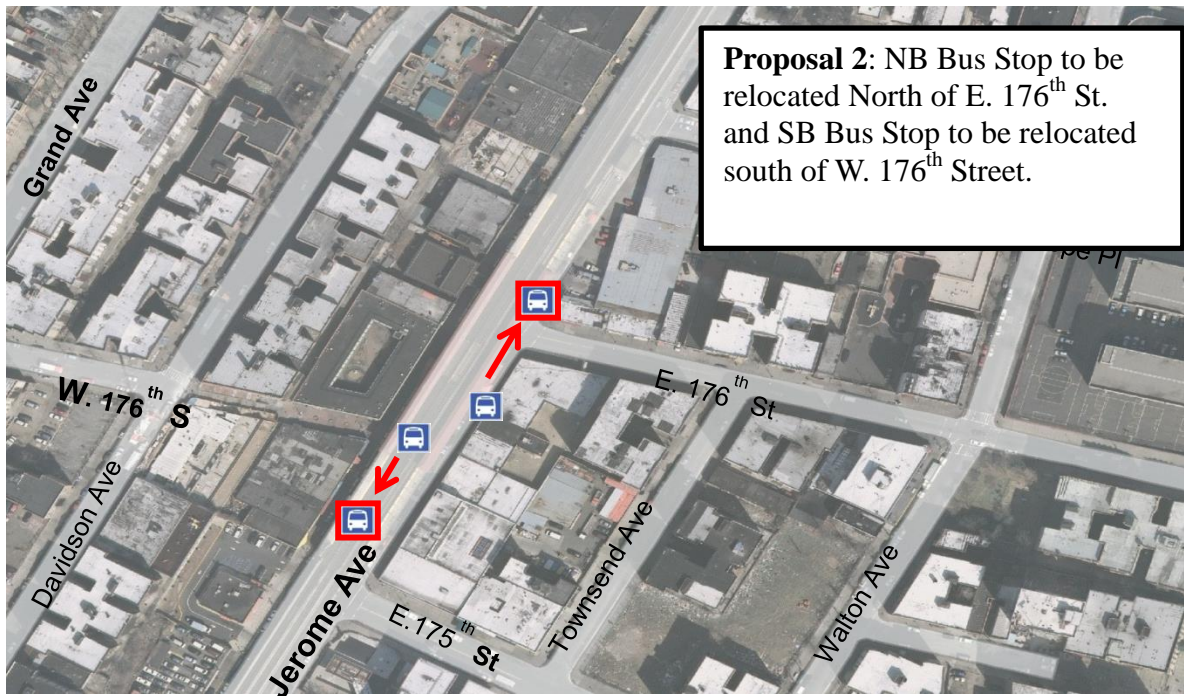
Proposal 1: Southbound bus stop will be relocated south of 176th Street.

Proposal 2: Northbound bus stop will be relocated north of 176th Street, in front of lumber delivery entrance and the southbound bus stop relocated south of W. 176th Street.

Exhibit 9-12 show proposed locations for the bus stop relocation.

Exhibit 9-12

Jerome Avenue and 176th Street - Proposed Bus Relocation



APPENDIX

Evaluation of One-way Proposal Mt. Eden Avenue between Jerome Avenue and Macombs Road

Mt. Eden Avenue One-way Conversion

During the summer of 2012, CB 4 requested and scheduled a site visit with DOT to observe many locations where DOT recommended improvements as a part of the public participation process. Resulting from the field visit, CB 4 asked DOT to evaluate converting Mt. Eden Avenue to one-way operation to address some of the congestion in the vicinity of the Jerome Avenue/CBE interchange.

Subsequent to the field visit a reconnaissance was done and DOT conducted traffic counts (ATRs and manual turning movements) in October 2012 at six locations at the Jerome Avenue/CBE interchange to evaluate the proposal.

From the data collected, a balanced traffic network was prepared for the AM and PM peak hours for the existing condition and the proposed one-way. The eastbound traffic was reassigned based on the origin and the most direct route for the proposed one-way. A total of eighteen intersections (twelve signalized and six unsignalized) were analyzed using the HCS/Synchro methodology. This new data and analysis required nine additional locations to be reevaluated including five locations where recommendations were previously made.

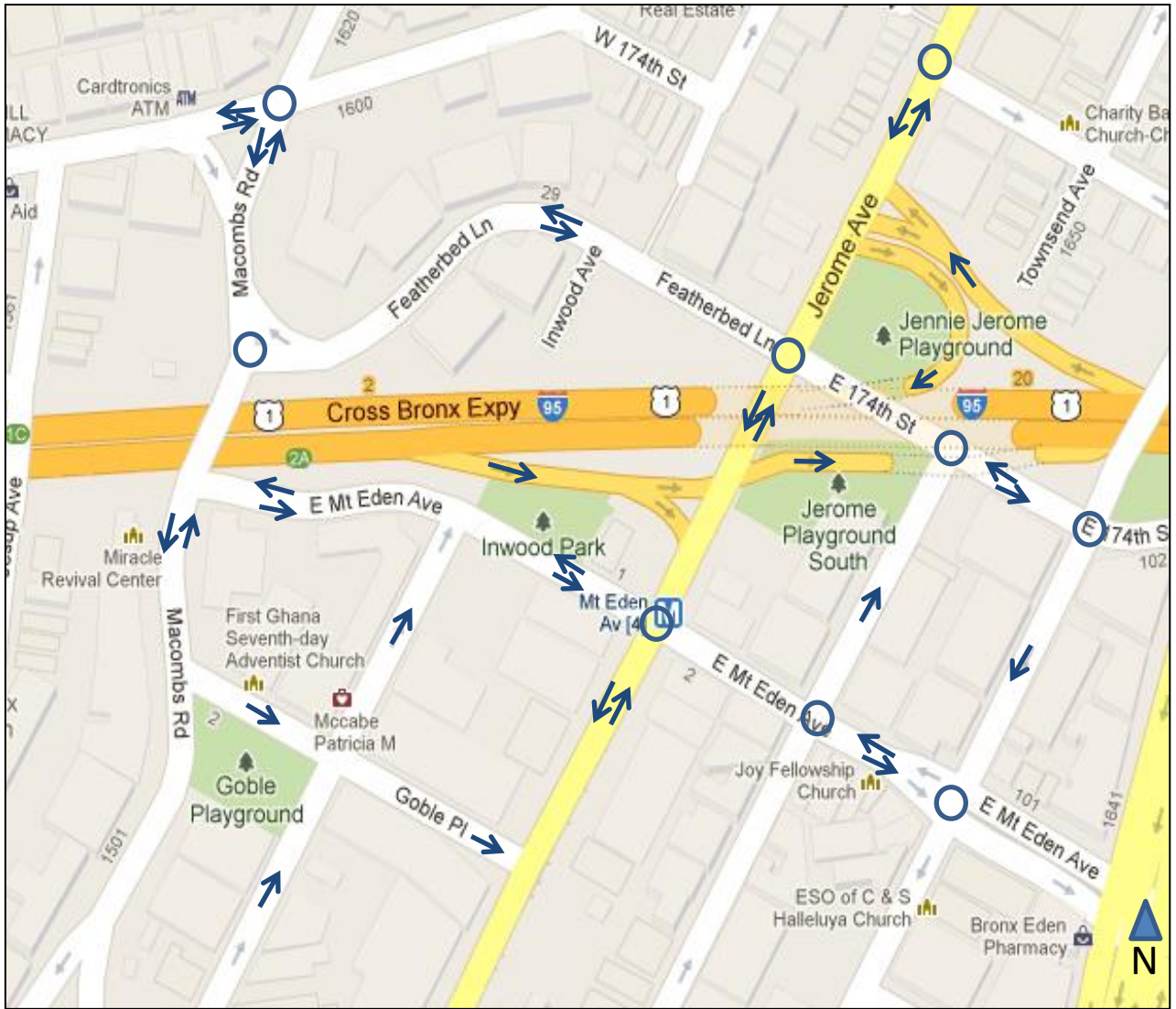
Figures A-1 and A-2 show the existing street network and the extent of the proposed one-way conversion. Figures A-3 and A-4 show the existing updated network volumes for the AM and PM peak hours. Figures A-5 thru A-8 shows reassigned and balanced network volumes for the one-way conversion. Figure A-9 shows the existing vs. proposed configuration of the Jerome Avenue and Mt. Eden Avenue intersection.

Tables A-1 and A-2 show the HCS and Synchro analysis results (delays and LOS) for the existing and proposed one-way operation affecting a wider area. Table A-3 shows the delays and LOS for the intersections directly affected by the one-way conversion.

The proposal will improve the overall traffic operations in the area, eliminate the queuing for the eastbound approach and reduce congestion at the intersection of Mt. Eden Avenue/Jerome Avenue. The traffic flow on Mt. Eden Avenue, between Macombs Road and Walton Avenue will improve significantly. In addition, traffic to and from Mc. Donald's parking lot will create less conflict.

The conversion of Mt. Eden Avenue will compliment Goble Place as a one-way pair, which was implemented recently.

Figure A-1
Cross Bronx Expressway/Jerome Avenue Interchange
Existing Street Network

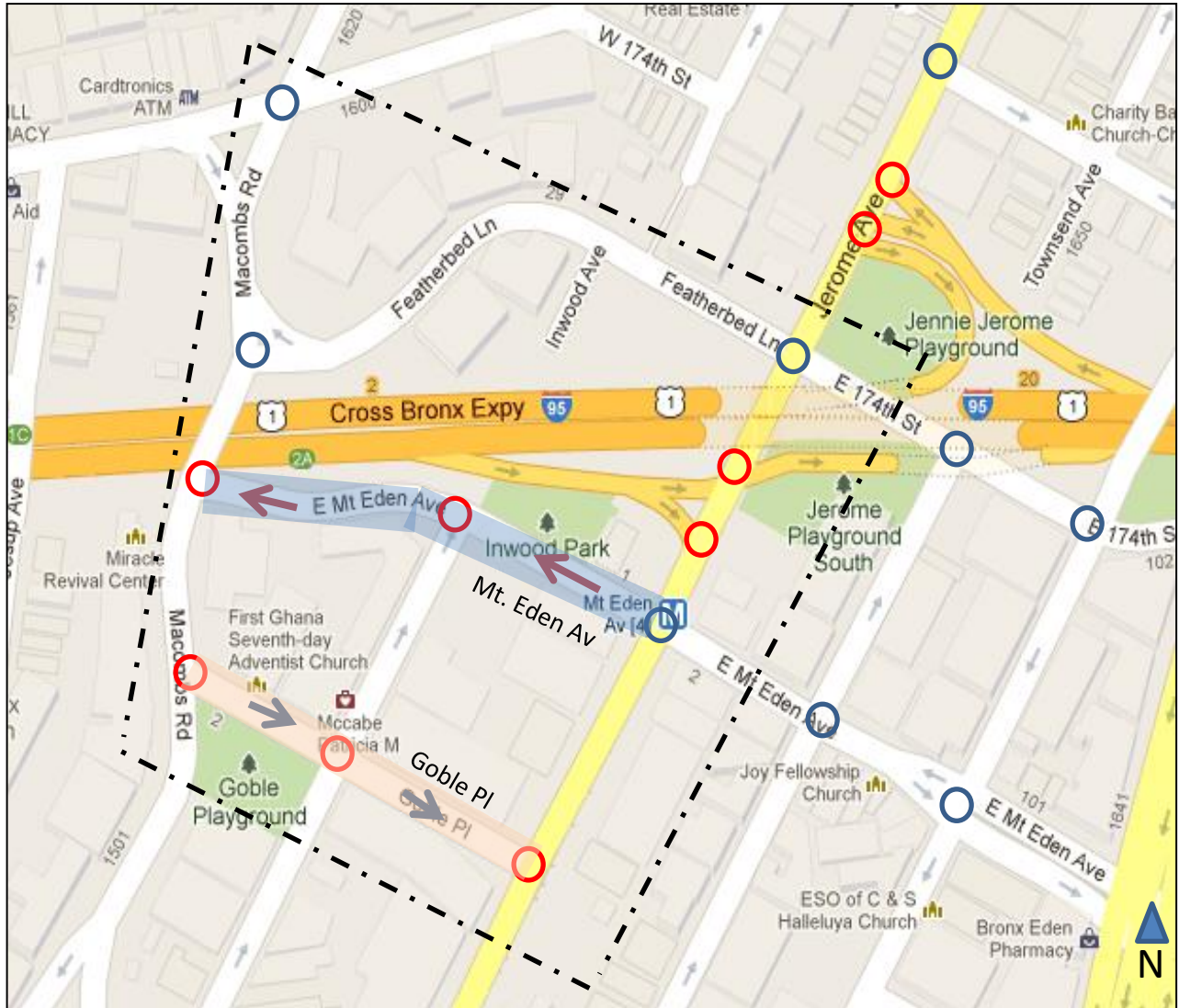


○ Previously Analyzed Intersection

← Street direction

Figure A-2

Cross Bronx Expressway/Jerome Avenue Interchange
Proposed One-way Conversion



Analyzed Intersection:

○ Previous

○ Recent



Mt. Eden Avenue - Proposed conversion from two-way to one-way WB



Goble Place – Converted from two-way to one-way EB (Implemented 2012)

Figure A-4

Cross Bronx Expressway/Jerome Avenue Interchange

Existing Volumes 2012 (PM Peak)

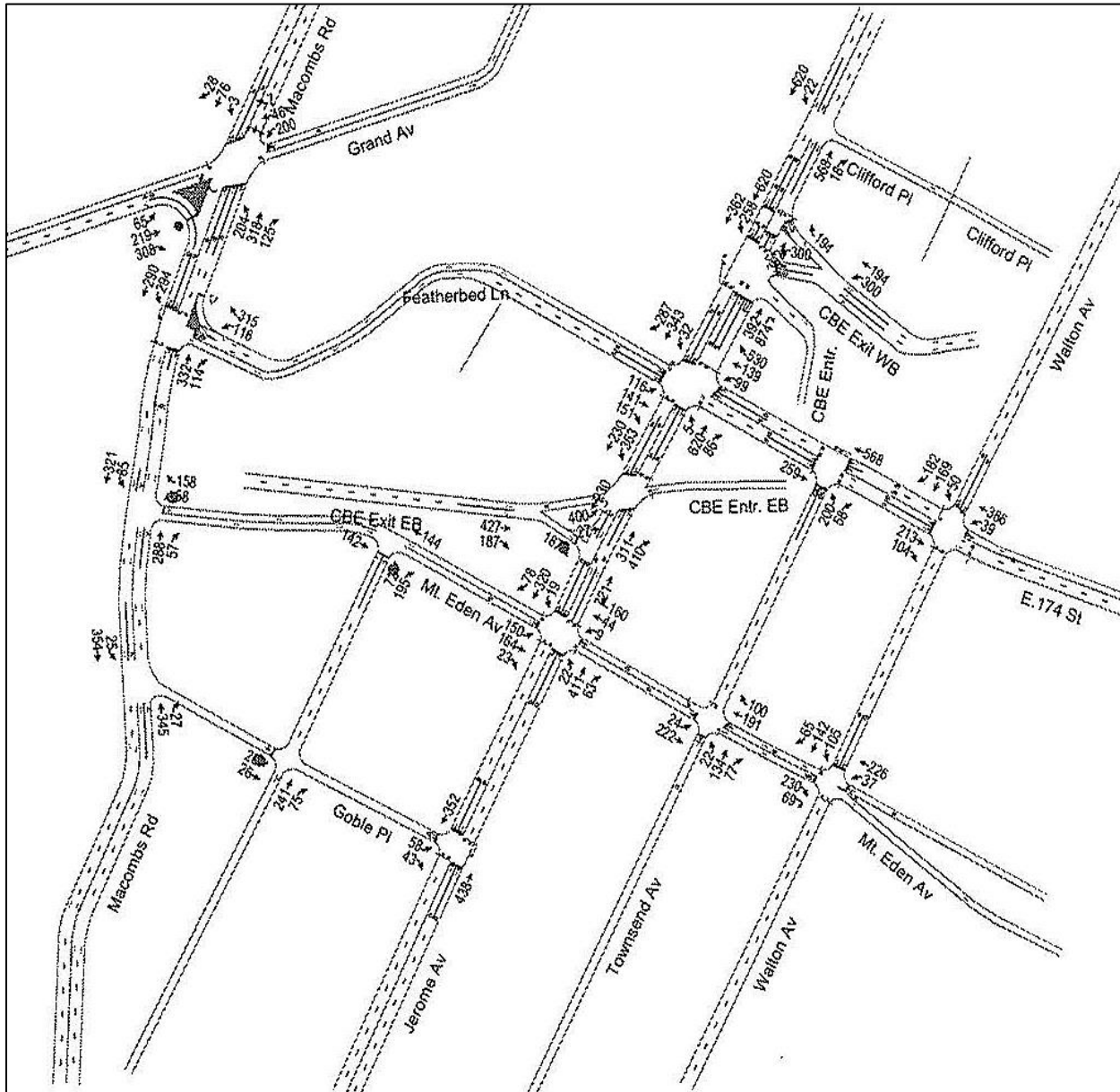


Figure A-5

Cross Bronx Expressway/Jerome Avenue Interchange
One-way Conversion – Diversion Volumes (AM Peak)

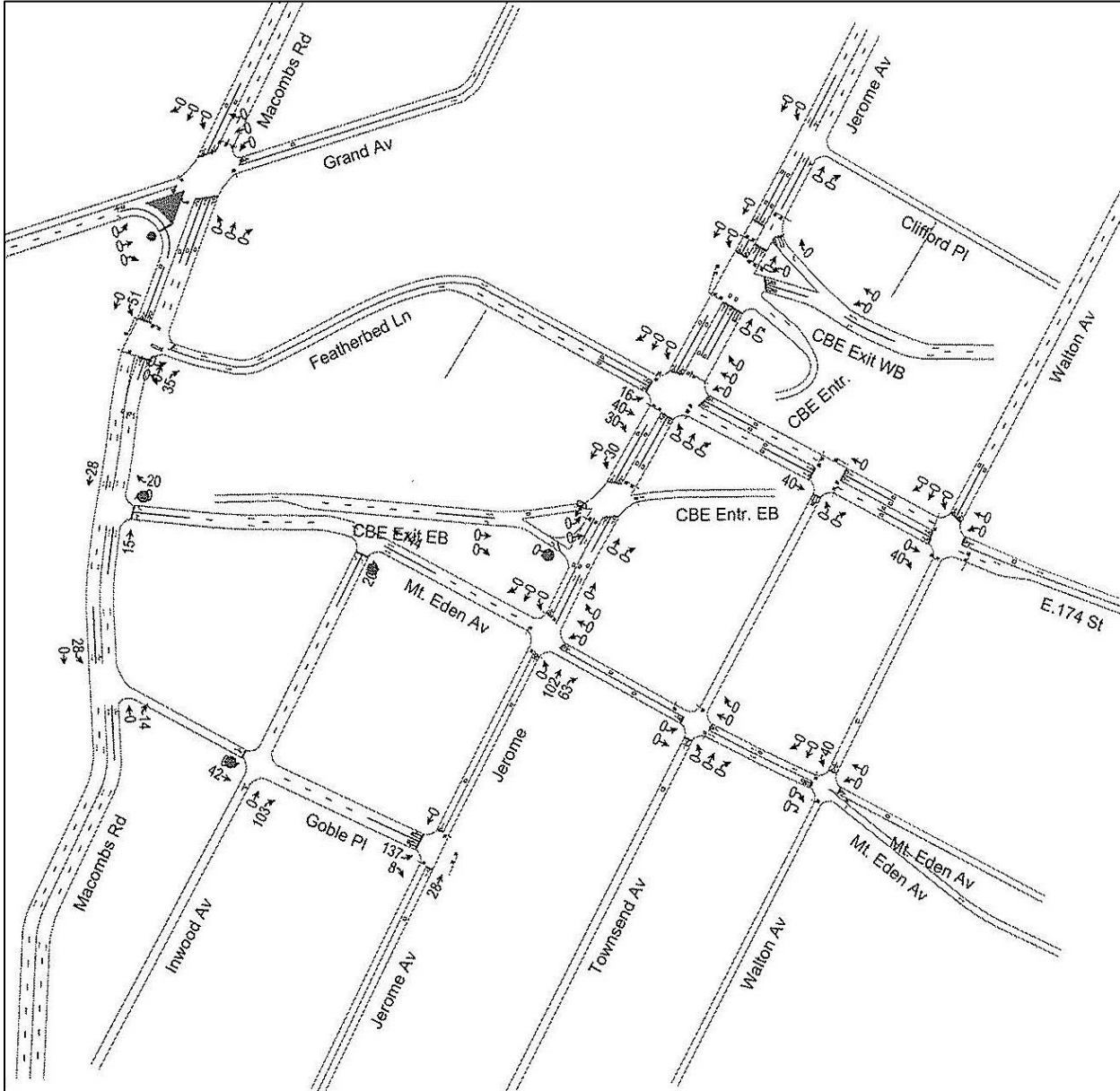


Figure A-6

Cross Bronx Expressway/Jerome Avenue Interchange
One-way Conversion – Diversion Volumes (PM Peak)

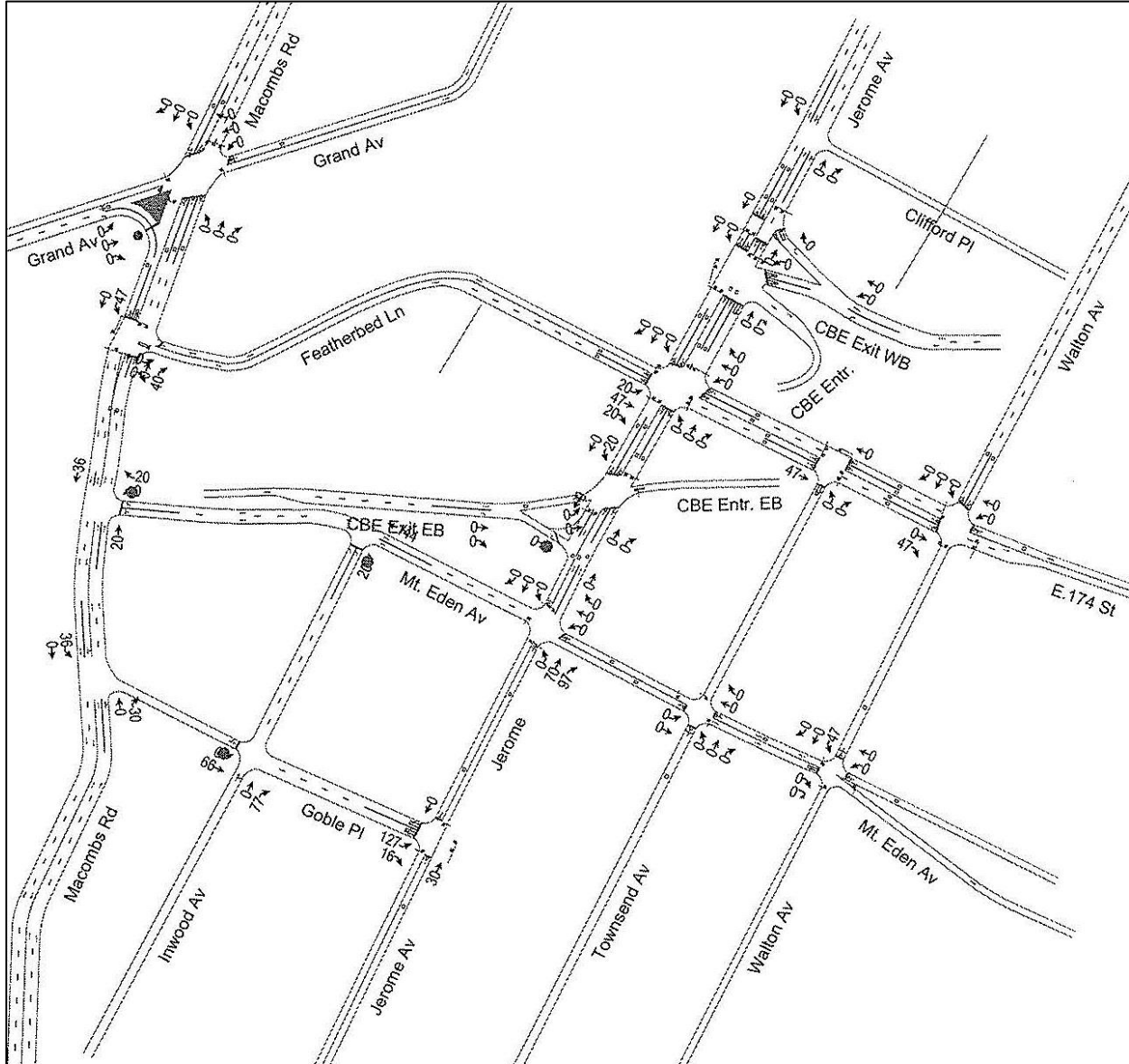


Figure A-7

Cross Bronx Expressway/Jerome Avenue Interchange

One-way Conversion Volumes (AM Peak)

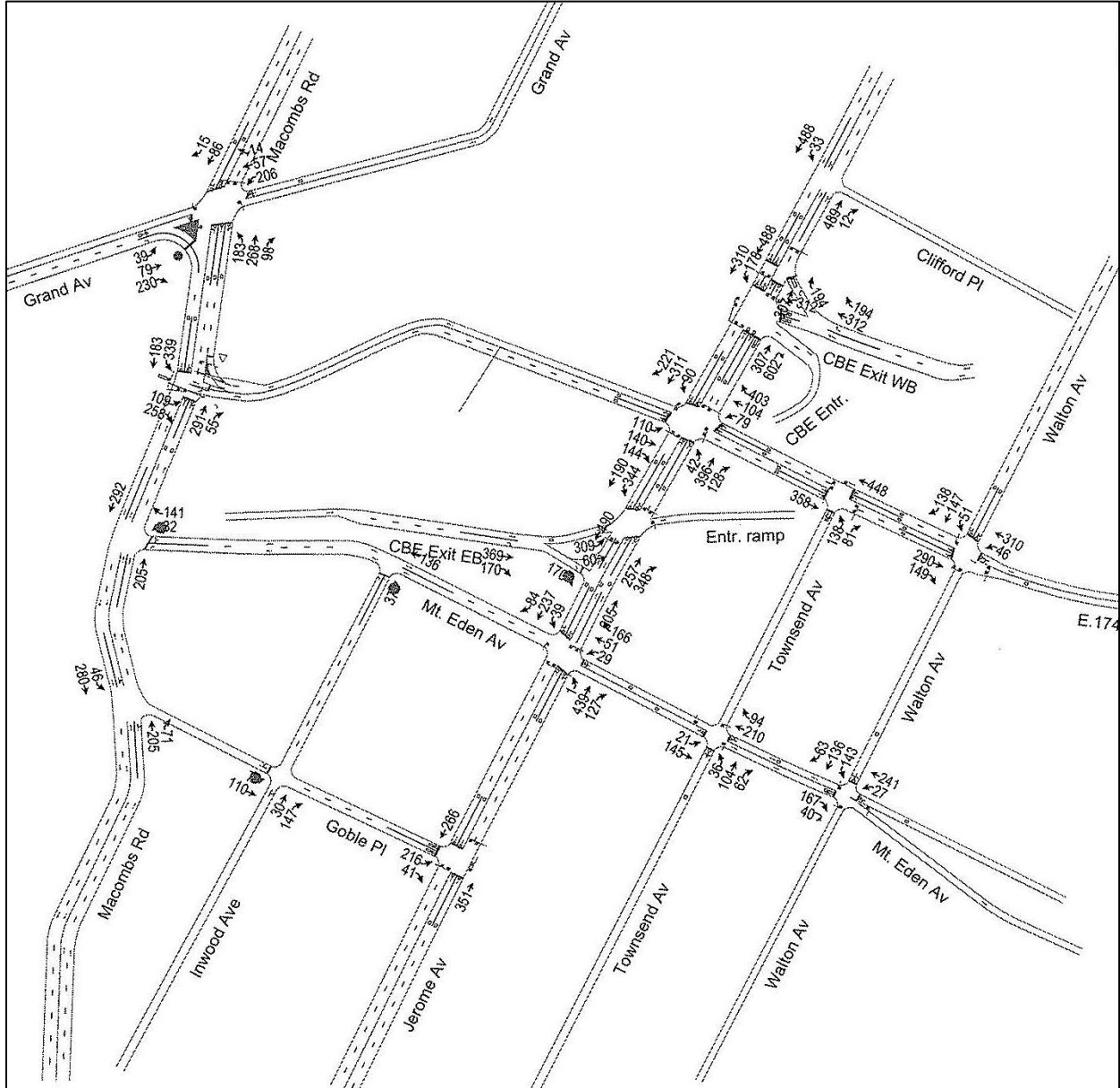


Figure A-8

Cross Bronx Expressway/Jerome Avenue Interchange

One-way Conversion Volumes (PM Peak)

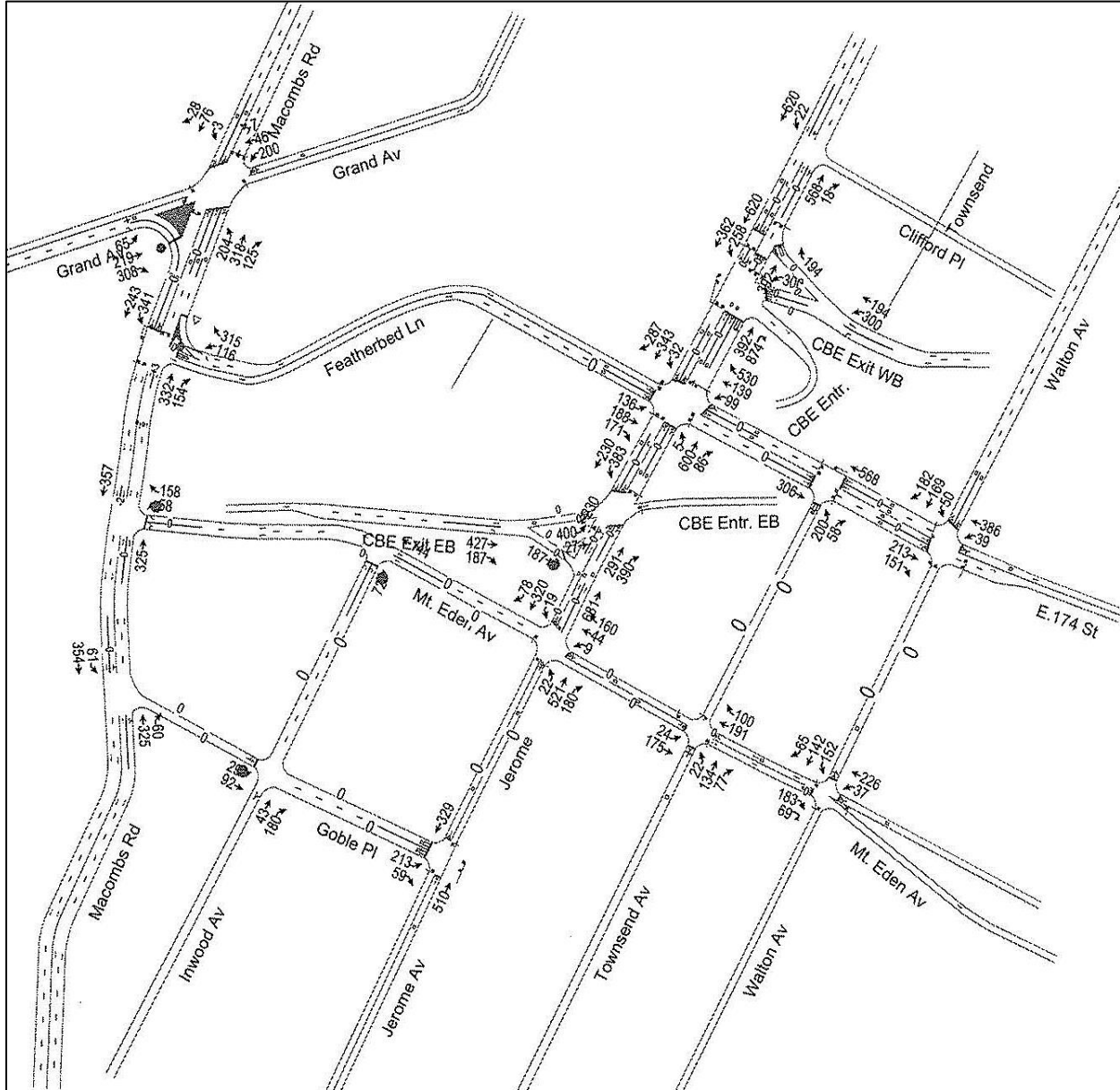
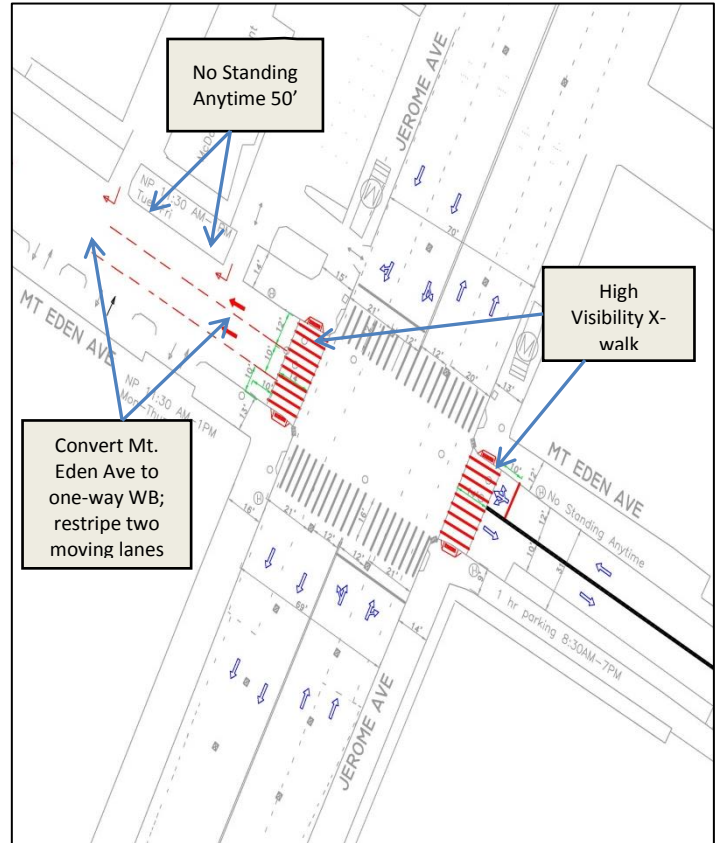
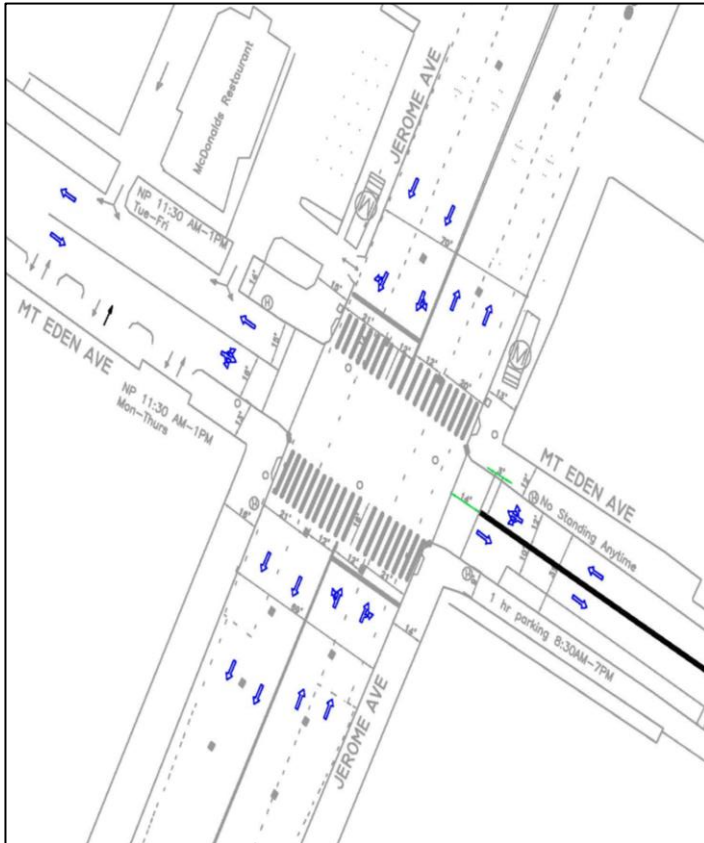


Figure A-9

Cross Bronx Expressway/Jerome Avenue Interchange
Mt. Eden/Jerome Avenues intersection

Existing

Proposed





JEROME AVENUE NEIGHBORHOOD STUDY GOALS AND PRIORITIES

Bronx Community Board 4 & Community Board 5 version 7

SEPTEMBER 29, 2016



JEROME AVENUE NEIGHBORHOOD STUDY

Goals and Priorities

Bronx Community Board 4 and Community Board 5

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Appendices

Appendix 1: Bronx Community Board 5 Section 197-a Plan Phase I Summary Report (2002)

Appendix 2: Jerome Avenue Transportation Study, (February 2012)

Appendix 3: Letter of Support Project H.I.R.E. Application, Bronx Community College (2016)

Prepared By:

Ms. Kathleen Saunders, Chair Community Board Four

Mr. Paul Philips, District Manager Community Board Four

Ms. Mildred James, 2nd Vice Chair, Community Board Four

Ms. Brenda Dawson, Chair Municipal Services Committee, Community Board Four

Mr. Barry Nissen, Treasurer, Community Board Four

Dr. Bola Omotosho, Chair Community Board Five

Mr. Angel Caballeros, 1st Vice Chair, Community Board Five

Ms. Thomasina Bushby, Secretary, Community Board Five

Ms. Cheryl Westbrook, 2nd Vice Chair Municipal Services Committee, Community Board Five

Dr. Marcia Brown, Chair Health and Human Services, Community Board Five

Ms. Jaqua Curiel, Treasurer, Community Board Five Board

Mr. Xavier Rodriguez, former District Manager, Community Board Five

I. INTRODUCTION

The Jerome Avenue Neighborhood Study encompasses a 73-block area focused primarily along the Jerome Avenue corridor. The study includes Community District Four which includes the neighborhoods of *Concourse, Concourse Village, East Concourse, Highbridge, Mount Eden, West Concourse*, and Community District Five which includes *Fordham, Morris Heights, University Heights* and *Mount Hope*. The study area is generally bounded by E. 184th Street to the north, E. 165th Street to the south, includes portions of Edward L. Grant Highway, East 170th Street, Mount Eden Avenue, Tremont Avenue, Burnside Avenue and East 183d Street.

While not as drastic as the declines experienced in areas such as Mott Haven, Melrose, Morrisania and Hunts Point, Community Districts Four and Five experienced population decreases of 20 percent and 12 percent respectively between 1970 and 1980. Growth in Community District Four was a modest 4 percent from 1980-1990 while Community District Five experienced growth of 12 percent during the same period. From 1990-2000 each district experienced growth of 15 percent and 8 percent respectively. Overall growth was modest from 2000-2010 (5% and -0.1%). While these districts have seen tremendous growth in terms of population over the last thirty years, investment in infrastructure including *open space, schools, transportation infrastructure, job training and business development* have not kept pace. Furthermore these districts like many in the South Bronx experienced disinvestment during the 1970's and 1980's that has yet to be recaptured.

Since June 2014, Community Boards Four and Five have played in active role in the development of goals, priorities and strategies with key city agencies and community stakeholders around key topic areas including: *Economic Development, Housing, Schools & Education, Transportation Infrastructure/Connectivity, Public Safety and Health and Wellness*. While the goals and priorities outlined in the various outreach documents and summaries produced by the Department of City Planning (DCP) throughout the planning process include input and insight from both Community Boards 4 and Five, as voting bodies of the Uniform Land Use Review Process (ULURP) the Boards felt it was imperative to create a platform that specifically articulated their goals and priorities as it relates to the neighborhood plan that complements the proposed changes to land use and zoning.

The following summarizes the goals and priorities for each board as it relates to the Jerome Avenue Neighborhood Study. Please note:

- Specific programs, capital investments and expense items are specifically identified. Some are specific to each district others are more broadly focused.
- There are a number of capital projects that are underway, completed and others that are funded with a timeline forthcoming. As stated earlier investments in these districts have not kept pace with population growth, nor has there been a concerted effort to invest in these neighborhoods.
- This document represents capital and expense items that that should supplement and compliment those projects to catalyze the future vision for both.
- This is a working document and we will continue to update and enhance the document throughout the planning process.

II. ECONOMIC DEVELOPMENT

Economic development is a top priority for both Districts and in order to improve the economic profile and social well-being of these communities and its residents it is imperative to build upon and leverage existing assets. Community District Five benefits from six commercial corridors: Fordham Road which includes the Fordham Shopping District, the third largest retail area in the City with one million square feet of retail space, South Fordham Road and South Grand Concourse Avenue, Burnside Avenue, West 183rd Street and West/East Tremont Avenue; Bronx Community College (BCC) a major educational institution and employer in the District, Morris Heights Health Center and Montefiore Hospital.

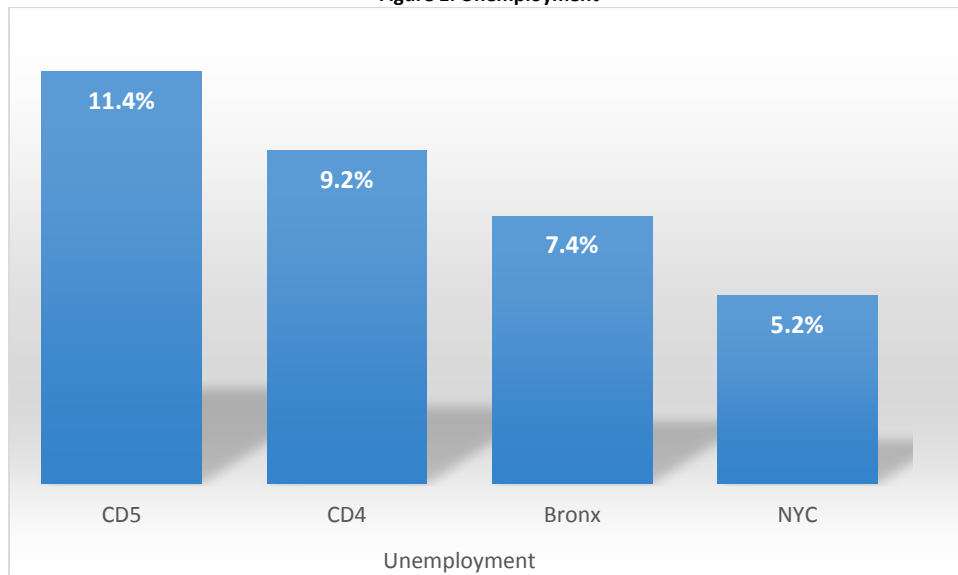
Community District Four benefits from the regional draw of the 161st Street/Capital District area which includes the Bronx County Court, Bronx Supreme Court, the 161st Street BID, waterfront access, Bronx Terminal Market which includes a million square feet of retail and Yankee Stadium which draws more than 3.5 million visitors per year. Major employers include Bronx Lebanon Hospital, the Yankees and Hostos Community College.

The continued economic growth of these areas should be pursued through a number of initiatives that will position these neighborhoods to compete for investments from both the public and private sectors as well as commercial opportunities that will ultimately enhance the socio-economic status of local residents.

Unemployment plays a key role in the socio-economic status of local residents. While unemployment both nationally and in the Bronx has hit record lows (5.5 percent and 6.6 percent) respectively, the residents of Community Districts Four and Five are still contending with this issue. Unemployment in Community District Five is a little less than 12 percent. CD4 Community District Four fairs slightly better at 9.2 percent, nonetheless underscoring the need to create jobs and economic opportunities for area residents. It should also be noted these numbers do not account for the tens of thousands of residents who are underemployed.

In order to increase the income levels and improve the socio-economic status of local residents there must be significant investments in job training, job placement, skills assessment and business development. The Department of Small Business Services (SBS) and to a lesser degree the NYC Economic Development Corporation (EDC) should play a key role in facilitating programs and policies to achieve these goals.

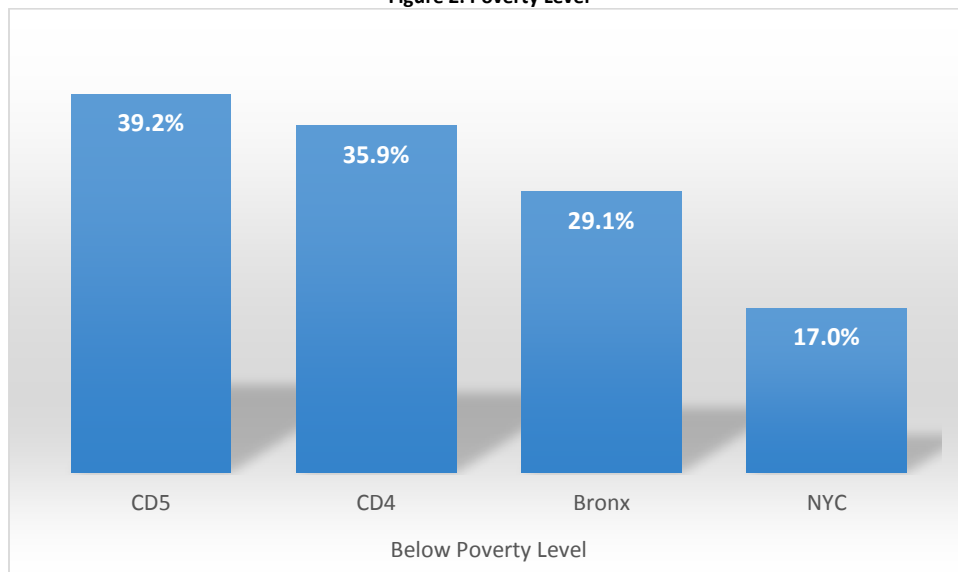
Figure 1: Unemployment



Source: US Census; ACS 2014

Although there is a range in the socio-economic makeup of residents in these areas, the percentage of households living near the poverty line and who are considered to be low-income is high. The poverty rate for both districts far exceeds that of the Bronx (29%) and NYC (17%) at 35.9 percent and 39.2 percent respectively. Furthermore, more than 45,000 households representing roughly fifty percent of total households have received Food Stamp/SNAP benefits in the past 12 months. ¹

Figure 2: Poverty Level



Source: US Census; ACS 2014

¹ U.S. Census, America Community Survey

The solution is a multi-pronged approach encompassing short-term and long-term strategies that will create more opportunities for area residents with long lasting positive effects that will elevate the socio-economic profile of both districts. Increased funding for job training and job placement initiatives are instrumental tools to effectively reverse these trends. The following are a list of proposed strategies and programs:

- Creation of a Local Employment Network for the purpose of connecting local residents to available job opportunities.
- Funding community-based organizations (i.e. Davidson Community Center, WHEDco, Bronx Works, etc.) to enable them to develop a network similar to the Lower East Employment Network for the purpose of engaging developers in the neighborhood, providing sector-specific training for local residents, screening candidates for available positions in emerging projects and making referrals where necessary.
- Localized Street Vendor Program
 - Create a pilot program with DOHMH, SBS, MOIA and DCA
 - Legitimize existing food carts operating without a license (smaller fee)
 - Ensures/promotes health and well-being by creating standards for business operation
- Leverage meeting space with BCC, Monroe, Bronx Lebanon, Bronxworks and others to host community training workshops and information sessions.
- Increased funding for Bronx Community College (BCC), Hostos, Monroe College and the Bronx Museum of the Arts and the Morris Height Health Center all of which are major employers and critical to improved education and skills training area-wide. These institutions currently provide quality education are quite strategic to the provision of quality education, skills training and certification programs in *construction, auto repair, healthcare, information technology and retail management*.
 - Increasing funding and enhancing these programs will provide a robust array of skills significant opportunities for area residents, improving their socio-economic status. Partnerships with these institutions will provide a robust array of skills training and certification programs to aid local residents across various sectors. There should be a focus on apprenticeship programs.
 - Best practices should be leveraged from institutions around the city and the region including Rockland Community College which currently offers an auto mechanic certification program. Ultimately this will help lower unemployment rate, improve families' livelihoods and their economic profile.
 - The Human Resource Administration (HRA) should partner with these institutions to provide skills training and certification programs for a pilot project of up to 150 slots for the aforementioned training programs.
 - The success of the pilot project should be tracked from inception to placement to measure the effectiveness and success of the program.
- As a result of the Commercial District Needs Assessment (CDNA) being conducted by WHEDco, SBS should conduct a series of workshops/forums for perspective business owners/entrepreneurs in the District.
- Vacant Storefront Initiative
 - Target property owners along these corridors matching them up with perspective tenants that meet the diverse retail needs of the area.
 - SBS/EDC should work with business owners to develop business plans and negotiate long-term affordable lease terms.

- Incentivize property owners with low-interest loans for building improvements and interior upgrades.
- SBS should partner with local organizations such as WhedCo, BronxWorks and others to sponsor financial literacy and business plan development seminars/workshops.
- Clean Up Day
 - Work with merchants, local organizations and residents to sponsor clean up days to promote cleanliness along and around the commercial corridors.
- Incentivize program for non-chain stores (i.e. mom and pop) to locate in these areas. This would be for businesses that address the needs identified in the CDNA. This would encourage local entrepreneurs.
- Provide incentives for healthy food businesses to locate along these corridors. This would be in addition to FRESH and Healthy Bodegas.
- Increase funding and support for US Alliance, Amalgamated Bank and other community-based financial institutions to promote financial literacy, workshops and marketing to promote services and encourage residents to utilize traditional banking services
 - There could be an opportunity to create satellite locations in other parts of both districts and/or the creation of similar financial structures under the umbrella of established CDC's.

Business Improvement District Formation (BID)

Merchants and community leaders have been actively engaged in the creation of a Business Improvement District (BID) including Burnside Avenue, East Tremont and Jerome Avenues for several years. As an interim step, we are requesting funding for a "BID Express" which would provide services analogous to a BID to property owners and merchants within the corridor with the ultimate goal to form a permanent BID. The creation of a BID would improve conditions in these neighborhoods on a number of fronts including cleanliness, retail continuity, retail diversity while creating a sense of pride, unity and ownership amongst local merchants and residents.

As stated previously, Community District Four benefits from the Bronx County Court, Bronx Supreme Court, the 161st Street BID, Harlem River waterfront access, Bronx Terminal Market and Yankee Stadium. Much of that activity is concentrated in the southern portion of the District. The neighborhood plan provides an opportunity to enhance the commercial corridors along East 167th Street, East 170th Street and Mount Eden, improve the variety and quality of retail, providing options that serve the needs of residents and visitors. Community District Four is also requesting a BID Express centered on the 170th Street corridor with the ultimate goals to create a 170th Street BID. This is a major transit hub/transfer point and has an existing merchants association.

There are currently 64 Business Improvement Districts in different neighborhoods throughout New York City. A BID, can be instrumental in making streetscape improvements and other enhancements that will transform Burnside Avenue and East 170th Street into vibrant commercial hubs.

The BID Elements include:

- Seed Money:
 - A grant of \$100,000 is being requested in facilitation of "Taste of the Burnside Avenue BID"
- Street Maintenance/Sanitation Services
 - The BID will hire a private sanitation team to sweep and reduce trash on the streets and sidewalks of the district.
- Graffiti Removal

- The BID will engage in regular graffiti removal to help make the district a more inviting place to shop.
- Retail and Marketing
 - The BID would undertake retail attraction efforts to diversify the retail needs as identified by the Commercial District Needs Assessment (CDNA). The BID would also create a multi-faceted marketing program that will give Burnside Avenue a competitive advantage in attracting shoppers to the District.
- Security Services
 - The security services proposed for the District would include but not limited to services that will assist the police force secure and continuously maintain law and order within our community.

The formation of BID's in these areas will stabilize these emerging commercial corridors, increase revenues and make these areas more marketable and attractive to future business owners, investors and entrepreneurs.

Auto Industry

Jerome Avenue is a major corridor spanning both districts currently characterized by low-scale automotive and marginal commercial enterprises. We are of the conviction that this is an opportunity for mixed-use development with active ground floor uses that enhance the neighborhood, promoting walkability and safety. The auto industry has a long history in these neighborhoods. Many businesses are utilizing streets and sidewalks to conduct oil changes, change tires and wash cars. These add to the numerous health and wellness issues including poor air-quality which exacerbates high asthma rates, impedes the ability to walk and promote healthy active living.

In order to fulfill the long-term vision to connect these neighborhoods, creating vibrant mixed-use, mixed income communities, and improve the overall health profile of area residents, the Boards respectfully request that the rezoning proposal include the four designated "preserved areas" as part of the rezoning to facilitate the potential for mixed-use residential, commercial and community facility development in the entirety of the study area. We do not feel that leaving any areas zoned C8-3 or M1-2 is beneficial to the long-term growth and sustainability of these neighborhoods, conversely this change would not result in the immediate displacement of businesses or workers nor would it preclude these uses from remaining. In fact similar zoning changes have been implemented in other parts of the City and in the Bronx including most recently the Lower Concourse Rezoning approved in 2009 which projected 3,414 units of housing to date has produced 285 and the East Fordham Road Rezoning approved in 2013 which projected 352 dwelling units and to date has resulted in no new dwelling units. ² In both cases the majority of the automotive and manufacturing businesses remain.

The United Auto Merchants Association (UAMA) with funding from Council Member Vanessa Gibson, recently completed a survey of the 104 auto businesses in the Jerome Avenue Study area. Environmental issues are a major concern of area residents as it relates to the proximity of these businesses to schools, open space and residential development. There are a number of licenses and permits that are required to operate certain types of auto-related businesses. 97 percent of those surveyed indicated that they did not have any knowledge of licenses or permits. ³ 23 percent of those surveyed said they did not have the required petroleum bulk permit from DEC. 20 percent of businesses indicated that they did not have an air quality permit and another 24

² Department of City Planning

³ Jerome Avenue Neighborhood Study: United Auto Merchants Association: Auto Industry Study

percent do not have the BNYFD certificate for spray painting. In addition, 21 percent of those surveyed were not registered with DEP and 20 percent did not submit their “Tier II” chemical reports. It is important to note that 85 percent of those surveyed indicated that Spanish was their preferred language and we acknowledge that language is a barrier for many of these businesses.⁴ 41 percent of businesses indicated that they needed help with compliance. In conclusion less than half of the auto businesses are in compliance based on the UAMA survey results. That being said, the preservation of the zoning is meaningless to the majority of these businesses without compliance and the associated licensing necessary to conduct business legally and safely.

Aside from the environmental concerns, these businesses are operating on very small footprints. 89 percent of businesses are operating on lots that are 5,000 square feet or less which contributes to why many businesses use the sidewalk and the street as extensions of their businesses. 95 percent of the businesses surveyed rent their space and 73 percent of those businesses have 3 years or less remaining on their lease. UAMA has been working closely with the businesses throughout this process and they are aware of the plan, the rezoning and its potential impact. 95 percent of businesses said they were not planning to move, however 84 percent said they would move if they received help and Survey results indicate that an overwhelming majority of the businesses would be willing to relocate.

Compliance was widely recognized as a critical issue for many of the businesses surveyed. These businesses will not be able to grow or expand legally without the proper licensing no matter where they are located. Furthermore, the UAMA survey results indicated that many of the auto workers were not equipped with education, language or technology skills necessary to provide them with a living wage.

The Board fully supports UAMA’s request for a City funded transition plan for the auto industry along Jerome Avenue. Community Boards Four and Five request that in addition to rezoning the “*preserved*” M1-2 and C8-3 districts for mixed use, residential, commercial and community facility development that the city provide comprehensive strategies and programs to address the needs of the workers and business owners both short-term and long term. These strategies and programs should be accompanied by expense funding to facilitate business growth, job training and skills development:

Short-Term

- Enable businesses to be better neighbors by offering comprehensive services related to compliance and auto-industry standards. The Department of Small Business Services (SBS) should work directly with business owners to remedy violation and licensing to increase their compliance.
- In conjunction with NYPD and CDOT conduct workshops and seminars and create literature related to parking, loading and street rules.
- Provide free legal services to business owners to negotiate lease terms.
- Provide free ESL classes at times that are convenient for workers and business owners.

Long-Term

- Develop a relocation fund which would include a package of incentives that will allow qualifying businesses to relocate to an area within the city that better fits the needs to these businesses

⁴ IBID

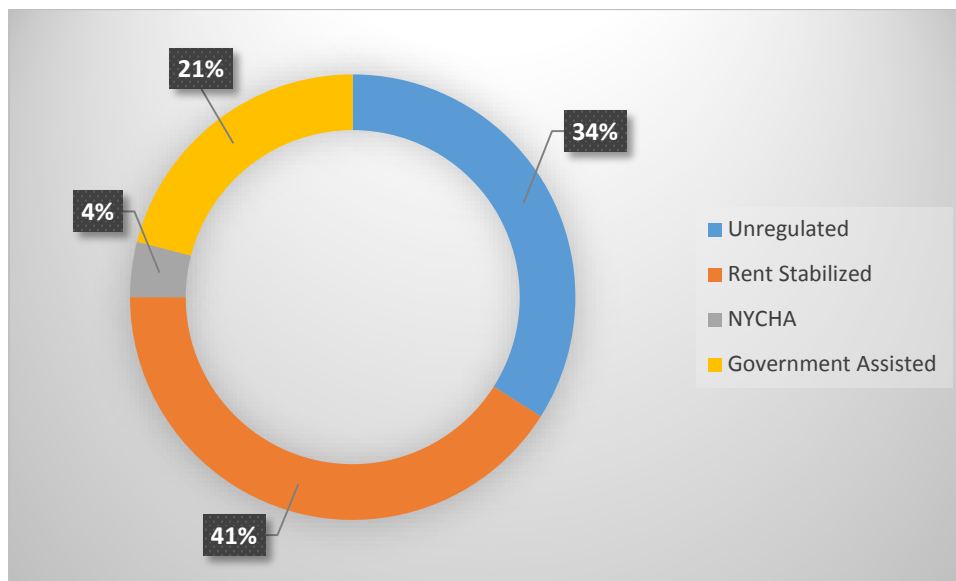
- Businesses must be in compliance with all rules and regulations related to the operation of their business and licenses must be up to date.
- SBS and EDC should work with qualifying businesses to develop a business plan based on the market and industry trends.
- Offer job training, skills development and job placement services to facilitate professional growth for workers and business owners. 73 percent of those surveyed indicated the auto technology training would be most helpful.
- Training should be offered for those who want to remain in the auto-industry and a program should be developed for those interested in other trades and skills training (construction, healthcare, HVAC/refrigeration)

Partnerships should be created with Bronx Community College, Hostos and others that offer similar certificates and training programs. The Local Employment Network should be utilized as a vehicle to facilitate this initiative

III. Housing

Housing New York: A Five-Borough, Ten Year Plan is Mayor de Blasio’s comprehensive plan to address the City’s affordable housing crisis. The plan seeks to invest in the development of 80,000 new income restricted units and preserve 120,000 existing affordable housing units over a ten-year period.⁵ The plan is projected to create 194,000 construction jobs and 7,100+ permanent jobs. The Housing Plan presents a tremendous opportunity to protect our most vulnerable residents, while creating opportunities for existing residents to grow within and/or return to these neighborhoods and provide permanent jobs in the construction trade. With a large inventory of stable, affordable housing stock (62 percent is regulated) we feel that a multi-pronged approach to maintain affordability for existing tenants will help support many of our low-income residents and this should be a top priority for housing as it relates to the neighborhood plan.

Figure 3: Housing Profile



Source: 2011 Housing and Vacancy Survey

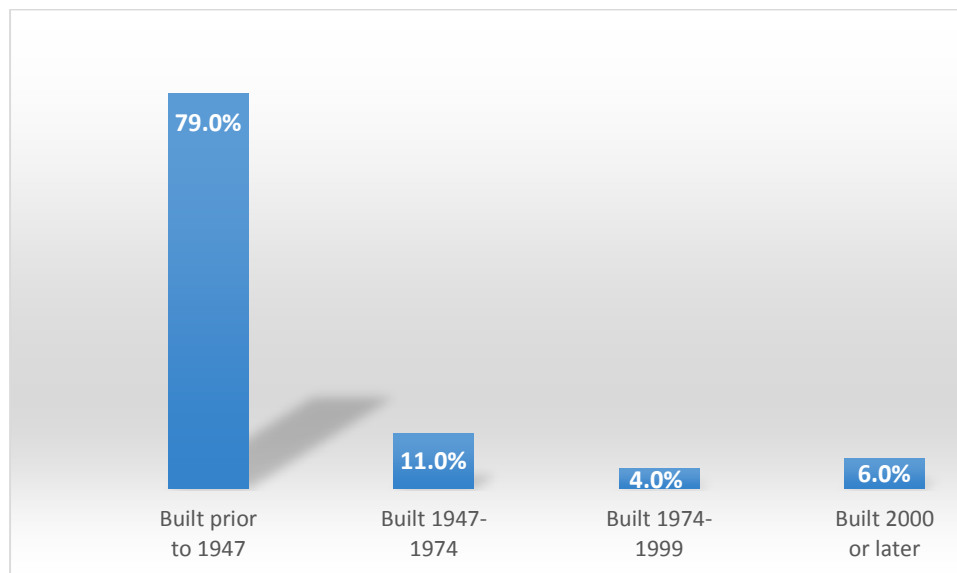
⁵ Housing New York: A Five Borough, Ten-Year Plan

Given the complexities of developing affordable housing, the fact that there is very little city-owned property in the study area and the extensive environmental remediation that will be required to redevelop these sites, construction of new affordable housing is an important goal to both Districts but a long-term one. However, this gives ample time to prepare area residents to capitalize on the thousands of permanent jobs that will be generated as a result of these developments. It should be noted that apprenticeship programs and the development of trade skills is of the highest priority to provide economic opportunities for residents and improve their socio-economic status.

Comprehensive preservation efforts in combination with programs and policies for new construction at a range of income levels from extremely low-income (defined as those making less than \$25,150) with a focus on moderate to middle income households (defined as those making \$67,121-\$138, 435) ⁶ allows housing opportunities for existing residents at various income levels and provides room for economic growth and advancement within the districts.

The good news is that almost 80 percent of the housing stock in Community Districts 4 and 5 was built prior to 1947. However more than 93 percent of those households rent versus own leaving them vulnerable to the whims of landlords and market conditions. Home ownership rates are roughly 3.6 percent in CD5 and slightly higher at 7.1 percent in CD4. Home ownership rates in the Bronx are roughly 19.2 percent and citywide more than one third of households own their homes. Additionally, more than 55 percent of all households were “rent burdened” meaning their gross rent was more than 35 percent of their household. The City has a great opportunity to preserve affordable housing in two densely populated community districts where income is limited and the necessity for public subsidy is a matter of survival.

Figure 4: Age of Housing Stock

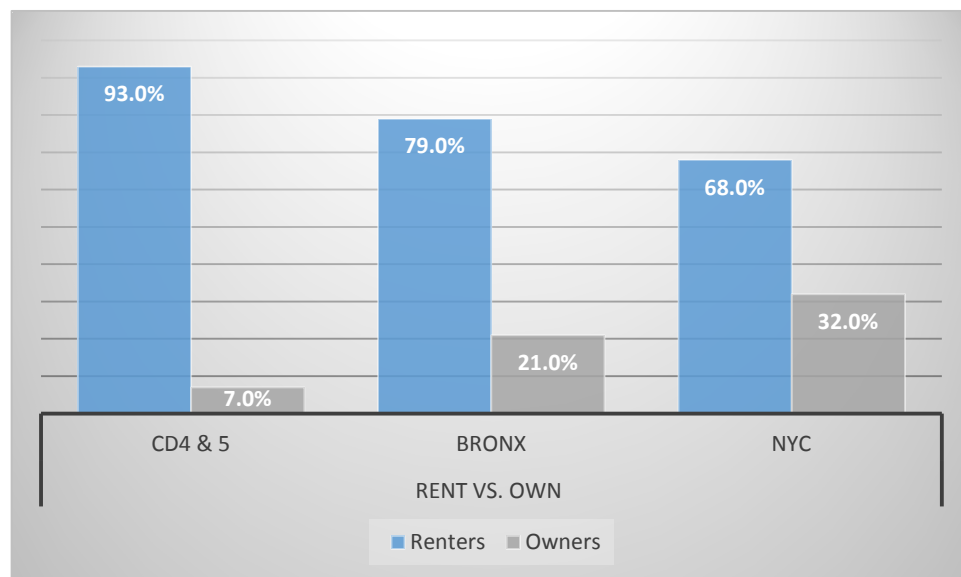


Source: 2011 Housing and Vacancy Survey

⁶ Based on U. S Department of Housing and Urban Development’s Estimates for Area Median Income (AMI) in 2014.

As the City plans to create new affordable housing through the rezoning of Jerome Avenue, we are advocating for adequate protection of existing residential tenants against any form of harassment. By this, the City must ensure that current residents are not being harassed by their respective landlords or even displaced from their homes. With the extraordinary number of rent stabilized and rent regulated apartments in the City the displacement of these tenants would intensify the housing crisis leading to increased rents and loss. It must be noted that tenant harassment has a direct bearing on the availability of affordable housing as each time rent stabilized tenants move out of their apartments, landlords are legally allowed to increase rents by twenty percent. Not only do tenants lose a rent stabilized apartment through this process, but over time, the apartment itself is made less affordable and eventually deregulated.

Figure 5: Rent vs. Own



Source: US Census; ACS 2014

Tenant harassment can take a number of forms which include lack of services (heat, hot water etc.); threats from landlords, frivolous legal actions; non-rent fees; pressuring tenants to take buyouts, taking advantage of loopholes in the rent stabilization laws and pitting tenants against one another. Suffice it to say existing residents have been experiencing these conditions for decades and the prospect of increased land values has increased these practices.

The following are a list of recommended interventions and policies related to Anti-Displacement, Anti-Harassment and Preservation:

Anti-Displacement & Anti-Harassment

- Publicly grade landlords and publicly display such grades in their building lobbies.

- Create citywide "Certificate of No Harassment" requirements, preventing landlords who have a history of tenant harassment from obtaining certain permits from the Department of Buildings.
- HPD should create a "Zero Tolerance" policy for harassment and poor building conditions which invariably enables the City to take legal action(s) against property owners.
- Strengthen and improve its various building inspection systems which require building inspectors respond to calls within 24 hours.
- Pass legislations to allow the City take ownership of buildings as a result of landlord harassment, failure to pay code violations and the criminal use of property.
- Increase its oversight duties of landlords and monitor housing court cases, particularly in high risk displacement areas and refer same to community organizations and/or legal aid/legal services that will do additional outreach to help determine if the case is part of a larger harassment pattern.
- Facilitate a process that will ensure developers contribute resources to prevent displacement of current residents. By this, they are required to pay into an anti- where developers are building and the funding would be dedicated to community anti- displacement initiatives.
- Make key neighborhood data available for public review through the creation of a comprehensive list of evictions; tracking of housing related 311 calls and the creation of a comprehensive list of distressed buildings by neighborhoods with all public information such as building ownership, management and most recent sale date
- Create a displacement fund for community organizing initiatives in the most vulnerable areas in these neighborhood
- Provide a \$100,000 funding for a community consulting housing contract to assist tenants, homeowners and property owners.

Preservation

- Homelessness has reached historic levels in NYC. In May 2016, there were 60,067 homeless people, which includes 14,097 families and 23,298 children.⁷ We recommend the reinstatement of the *Advantage Program* and funding to the *Homeless Eviction Prevention Program* to ensure that residents secure permanent housing and decrease the number of transient individuals and families in our districts.
- HPD should be proactive in creating a comprehensive strategy to target buildings for their preservation programs.
- HPD should increase its funding for code enforcement inspectors and provide incentives to property owners to repair and retrofit their buildings in accordance with the building codes like 8A loan and Participation loan programs.
- The city should reinstate the *Neighborhood Preservation Office* to deal with code enforcement, anti-harassment and displacement. This would provide a team of individuals geographically-based to deal immediately and directly with these issues. This office could also focus on improving conditions on NYCHA campuses.
- Increase funding for the Proactive Initiative (50 buildings are currently part of the Proactive Initiative more buildings should be added).
- Enact a set of policies that create incentives that prevent speculation and displacement as well as promote affordable housing development.

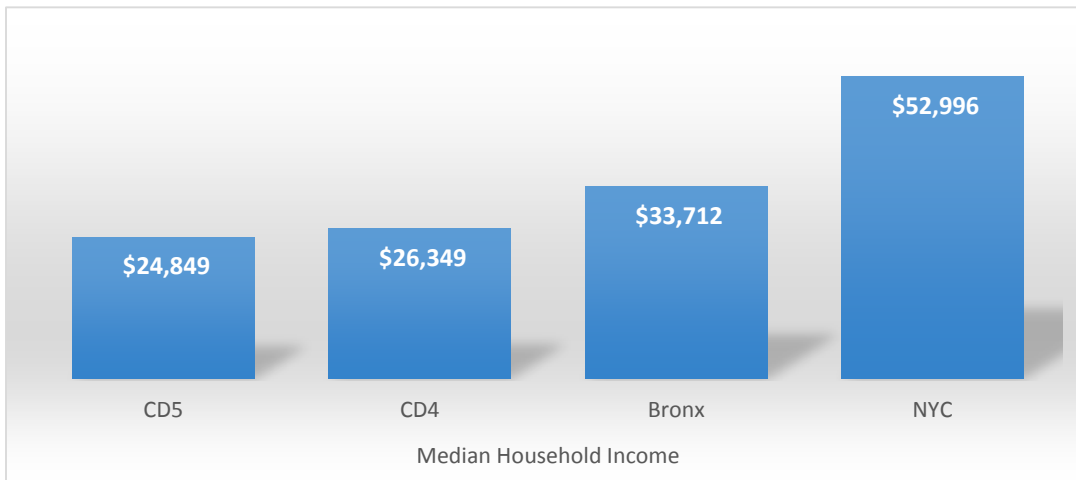
⁷ Coalition for the Homeless

- Support outreach and "*Know Your Rights*" education by community groups for the good of local residents as a way of improving communication with tenants about their rights.

New Construction

- It should be noted that while the median income is \$24,489 in CD5 and \$26,349 in CD4 a large segment of the population is rent-burdened and challenged in other areas economically, roughly 25% of households earn more than \$50,000 a year. This is not to say that there is not a need for affordable housing at lower income tiers, but rather there is an opportunity to empower residents with the financial and educational tools to become financially independent. In order to increase the median income we need area residents be earning more. As existing residents earn more we want to ensure that we are creating opportunities for upward mobility as it relates to housing. Currently, most of the new development does not offer options for people such as recent college graduates or a two parent household who has worked themselves through college or trade school and can afford better and larger living accommodations. If we do not create more opportunities for higher income earners we will continue to discuss high unemployment and a median income that lags behind the Bronx and represents half the median income citywide.

Figure 6: Median Household Income



Source: US Census; ACS 2014

- New construction that targets a range of income levels with a concentrated focus at 80% AMI and above
 - Mix and Match
 - M2
- Commitment to local hiring for union and non-union jobs for residents of CB4/CB5
 - Secondary focus on residents of the Borough of the Bronx
 - MWBE-Commitment to hire minority and women owned businesses
- Reports from HPD/HDC on as of right projects that receive city subsidy
 - Report should be furnished quarterly
 - Should include unit and income breakdown
 - Level of subsidy
 - Construction schedule
 - Inclusion of other program elements (commercial, community facility space)
- Ground Floor Uses
 - The majority of development is anticipated to be mixed-use with active ground floor spaces.
 - Community should play role in tenanting those spaces
 - HPD should work with SBS, local merchants associations and BIDs to source candidates for these new spaces
 - Rent should be negotiated offered below market with a guaranteed rate over a 5-10 year lease period
 - SBS should provide training and resources in advance for prospective tenants

Homeownership

- Home ownership will strengthen and stabilize these neighborhoods in the future.
- HPD should focus on home ownership for small buildings including NIHOP
- HPD should create a program and strategy to work with existing rental buildings that are interested in cooperative conversion. (e.g. HDPC)

- Home ownership opportunities should be targeted along the Grand Concourse, Concourse Village West area, Yankee Stadium area, University Avenue and West Tremont Avenue.
- Existing homeowners have endured the years when the level of investment in these neighborhoods was subpar. These residents should also be the beneficiaries of the neighborhood plan.
- Homeowners should receive enhancement credits when new construction occurs within a quarter mile of their residence. These credits would be used to upgrade sidewalks, fences and improve lighting and landscaping.
- Small home owners should receive a credit for property damage related to water and sewer damage related to new construction. The City should fine the developer and checks should be issued to the home owners in question.
- Prior to commencement of any new construction or significant renovations/expansions adjacent buildings should be properly protected from damage by the developer and the areas should be baited for rats bi-weekly during the construction period.

IV. Schools/Education

Roughly 42 percent of the total population in both districts is under 18 years of age. They are ranked #5 and #7 out of all 59 Community Districts in that category. Each district is ranked near the bottom of all 59 community districts as it relates to English, language arts proficiency and mathematics. Only 14.0 percent of the students in CD5 and 12.7 percent of students in CD4 English, language arts were performing at grade level. Each district fared slightly better in math with 18.5 percent and 15.4 percent respectively. Nonetheless, they were ranked 54 and 58 out of 59 community districts in English, language arts proficiency and 58 and 53 out of 59 in math. The Bronx ranks last of all the Boroughs in each of those categories.⁸

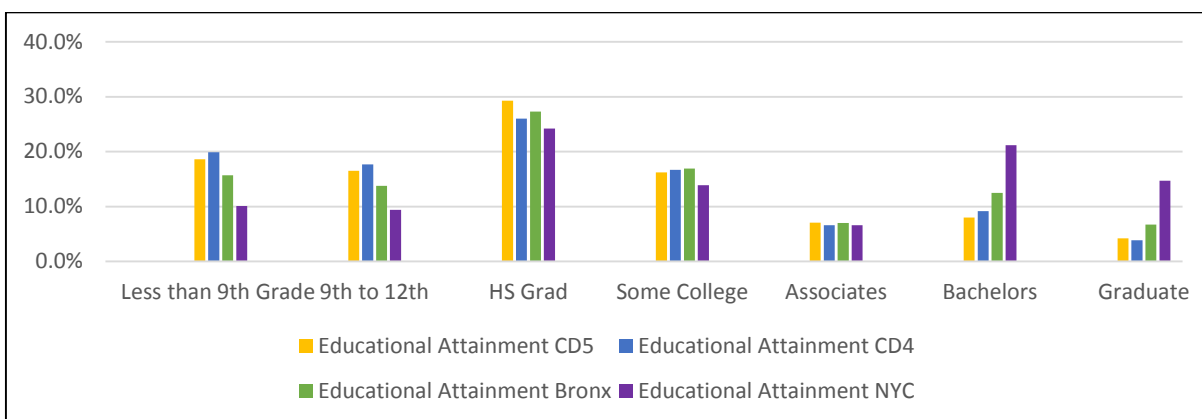
Educational attainment is one of the key indicators of success and quality of education provided and acquired by area residents. The quality of education in the Borough and both districts warrants a different lens and separate analysis that in many cases it outside the purview of this process. However, the physical condition and location of educational facilities while not the complete solution is a component of that formula. It can address issues of overcrowding and infuse state of the art facilities which in turn can positively affect how children learn and advance.

Currently the percentage of residents with less than a 9th grade education and from 9th grade to 12th grade is nearly double that of NYC. Furthermore both districts lag behind the Bronx and NYC in terms of percentage of residents with Bachelors and Graduate degrees.⁹ It is therefore imperative that the Department of Education and the School Construction Authority address the educational needs of our children.

⁸ State of New York City's Housing and Neighborhoods in 2015, NYU Furman Center

⁹ U.S. Census, America Community Survey

Figure 7: Educational Attainment



Source: US Census; ACS 2014

As new housing is developed it is crucial that the Department of Education allocate funds to provide adequate capacity at existing schools to keep pace with the influx of new residents and children.

We respectfully request the following related to schools and education:

- Construction of a high school within the Bronx Community College Campus.
- To increase English and math proficiency partnerships with Bronx High School of Science, Lehman College, Hostos College, Fordham University and Albert Einstein College of Medicine should be forged to create new innovate programs to educate our children and prepare them to compete in today’s workforce.
- There are a number of city-owned sites in Community District Four
 - A school(s) should be considered as part of redevelopment of these properties as there would be no acquisition costs for the city.
 - One or more of these sites should be evaluated for feasibility as a future school. (Lower Concourse North)
- No fewer than 1,500 additional seats should be provided for high schools in the District with 400 specifically provided for the high school located within Bronx Community College and to aid effective teaching and learning.
- The 2014-2019 SCA Capital Plan identifies 426 funded seats in School District 7 (Sub-district: Concourse) and another 572 unfunded seat in School District 9 (Sub-district: Highbridge South). Additionally, a need for 1,280 seats was identified for School District 10 (Sub-district: University Heights) with only 456 of those seats currently funded. We request funding and siting for all seats as part of the study.¹⁰
- There should be a substantial increase in the allotment of Universal Pre-K and Day Care slots up to 1,000 to support the projected increase in families and children. Parents within the District would require safe places like Child Care and After-School Care Centers and programs for their kids.
 - Universal Pre-K should be allocated on fifty percent of all new development

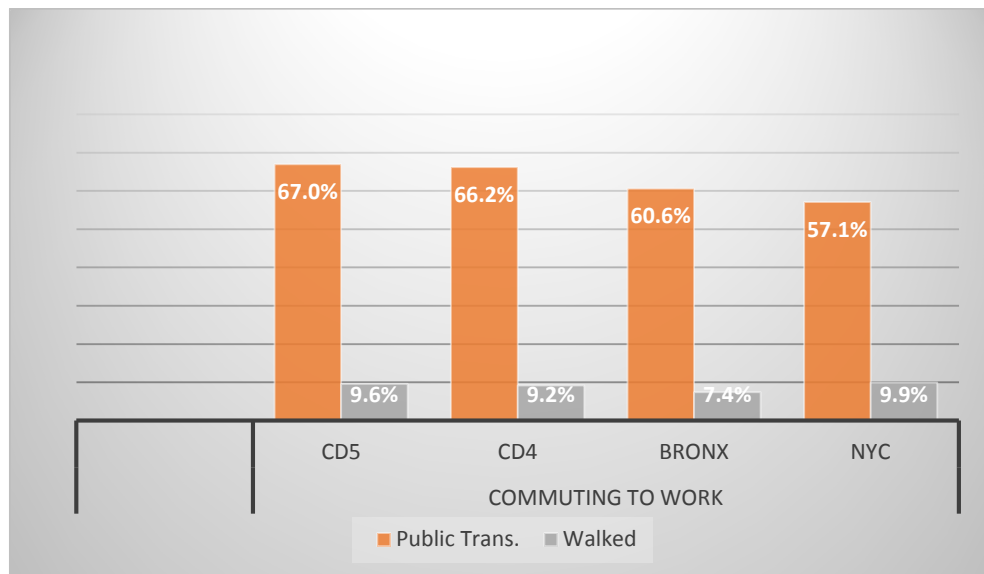
¹⁰ School Construction Authority: FY 2015-2019 Proposed Five Year Capital Plan Amendment.

V. Transportation Infrastructure/Connectivity

Access and mobility throughout the area is key. The MTA currently operates at 469 subway stations citywide and 307 bus routes. Currently there are 11 subway stops and ten bus lines running through these areas. Annually, the more than 26 million people pass through subways stations in the study area and 47 million riders utilize the bus routes.¹¹ This includes two stations in the top 200 (167th Street and 170th Streets), one station in the top 150 (Burnside) two bus routes (Bx1/2,Bx36) in the top ten and two bus routes in the top forty (Bx3, Bx11, Bx35, Bx40/42).

Nearly 68 percent of local residents, use public transportation to commute to work and for other official/personal engagements. Improvements to existing transportation infrastructure, amenities and the resurfacing and enhancement of our most vital north-south corridor - the Grand Concourse is a top priority. Additionally, access and mobility are extremely important and currently there is no elevator along the #4 line from 167th Street to East 183rd Street or the B/D from 167 Street to Fordham Road. Burnside Avenue would be the ideal location as this area is targeted for significant development in the future as well as the formation of a BID, however any location(s) between the aforementioned stations on either line would be acceptable.

Figure 8: Commuting Patterns



Source: US Census; ACS 2014

¹¹ MTA Annual Ridership 2015

The following outlines a list of infrastructure investments/improvements that are critical to fulfill the vision:

- Full rehabilitation and upgrade to underpasses at 165th, 167th, 170th, 167th Street, 174th -175th Street, Burnside Avenue and East Tremont Avenue.
 - Include painting and graffiti removal
 - New LED Lighting
 - New sidewalks
- B/D Station Enhancements/Rehabilitation:
 - East 167th Street
 - East 170th Street
 - 174th -175th Street
 - Tremont Avenue
 - 182nd-183rd Street
- A comprehensive maintenance and upkeep plan of the Grand Concourse Work (Phases I-IV)
 - Include plantings, shrubs and flowers
 - DPR is the ideal maintenance partner but there is currently only funding for Phase I
 - Include underpasses in the scope of the reconstruction of the Grand Concourse
- Maintenance and upkeep of safety enhancements at Shakespeare Avenue
- New LED lighting throughout particularly in areas with low visibility/foot traffic and high crime
- An elevator or escalator installed by MTA to better service seniors and handicapped and enhance access and mobility throughout the districts along the #4 line from 167th Street to East 183rd Street or the B/D from 167 Street to Fordham Road (ideally at Burnside Avenue Station or location deemed appropriate by MTA)
- A comprehensive assessment, plan and timeline for renovation and rehabilitation of Step Streets
 - Focus on Davidson Avenue between Featherbed Lane & Davidson Avenue, Steps Lane, West 168th Street, Anderson Avenue
- Metered parking in key locations to facilitate greater turnover
- A municipal parking lot to provide parking for area residents at reasonable rates
- Painting, lighting, seating and improved circulation and mobility around elevated stops, particularly those that are major transfer points (#4 train: 170th Street, Burnside Avenue)
- Increased bus service in areas such as Highbridge and University Heights to improve access for area residents and merchants
 - Select Bus Service on the Bx3, Bx36 or Bx18
 - Study and assessment of improved/increased service for the Bx40/41
- Constant monitoring of the conditions and repair of major thoroughfares in the district like the Grand Concourse, Fordham, University Avenue and Tremont Avenue Roads to ensure better service of the district's motoring public.
- Adequate funding (for continuous maintenance) of the major road bridge which serves as a gateway from Manhattan to the Bronx and connects Bronx Community Boards 4 and 5 as well as the Washington Bridge on West 181st Street.
- Facilitation of cleaner and improved streetscapes, especially on the Washington Bridge and Grand Concourse to ensure improved roadways and efficient transportation routes.

- Consideration and approval of a Slow Zone on University Avenue in addition to the already approved one on the Grand Concourse to act as traffic calming devices and reduce automobile and pedestrian incidents.
- "Boogie on the Boulevard" on the Grand Concourse Avenue at least once a month; just as we request additional resources for improved signage and traffic calming devices on all our major thoroughfares.

VI. Parks and Recreation

Open space and greening play an important role in the quality of life of area residents and workers in an area. Underserved areas are defined as areas of high population density in the City that are generally the greatest distance from parkland where the amount of open space per 1000 residents is currently less than 2.5 acres. Well-served areas have an open space ratio above 2.5 accounting for existing parks that contain developed recreational resources; or are located within 0.25 mile (approximately a 10-minute walk) from developed and publicly accessible portions of regional parks. Community District 5 is considered underserved in terms of open space. Community District 4 does not qualify as underserved or well-served.

The City's planning goal is based, in part, on National Recreation and Park Association guidelines of 1.25 to 2.5 acres per 1,000 residents of neighborhood parks within one-half mile, 5 to 8 acres per 1,000 residents of community parks within one to two miles, and 5 to 10 acres per 1,000 residents of regional parks within a one-hour drive of urban areas. Studies have shown that nonresidents, specifically workers, tend to use passive open space. The optimal ratio for worker populations is 0.15 acres of passive open space per 1,000 non-residents.¹²

Community District Five has an open space ratio of 0.03 and Community District Four has a ratio of 0.14. Comparatively the Bronx has an open space ratio of 0.25 and Manhattan and Staten Island have an open space ratio of 0.19.¹³ Each district has unique challenges related to open space. CD5 has a lack of open space and as a densely populated and built up area the opportunities to create new open spaces are limited. CD4 has a significant amount of open space but maintenance and upkeep is a challenge for the Borough Parks office in the district.

Community District Five priorities are as follows:

- Expedite the development of a proposed park site on 1805, Davidson Avenue, currently under the jurisdiction of the Agency for Children Services (ACS) to be transferred to the Department of City Wide Administrative Services (DCAS) for develop as open space. Currently a million dollars has been allocated for capital improvements but must these funds cannot be utilized until DPR has jurisdiction over the site.
- Develop segments of the Aqueduct trail along University and Tremont Avenues by developing a pedestrian bridge or a Step Street to reconnect the Aqueduct lands to the Aqueduct walkway. The Aqueduct Walkway runs south from Bronx District 7 on Kingsbridge Road to the boundaries of District 5.
- The development of Devanney Triangle, Mount Hope Gardens and West 184th Street, Grand Avenue Play Ground Park.
- Comfort stations at various park locations (such as Morton and Galileo Playgrounds) and for the development of instructional programming by the recreation aids and such an intervention would

¹² City Environmental Quality Review (CEQR) Manual 2014

¹³ Department of Parks and Recreation, Bronx Borough Office

further promote communal interaction among our residents as they will be availed the opportunities of engaging one another the more on a regular basis.

Community District Four priorities are as follows:

- The development of Corporal Fischer Park
- Completion and expansion of Grant Park
- New skating and bike surfaces for Mulally Park
- Additional areas for barbequing in existing parks (currently only permitted in Mill Pond Park)
- Free and reduced rates for tennis courts at Mill Pond Park
- The hiring of additional PEP officers to patrol and monitor the parks, particularly during Peak Season
- The hiring of additional horticulturalists to assist in the maintenance and upkeep of parks, green streets and trees throughout the District and the Borough
- CB4 Parks Administrator
 - Under the supervision of the Bronx Borough Commissioner this Individual would manage CB4 parks system wide and would be responsible for
 - Maintenance
 - Special Events
 - Recreational facilities
 - Personnel
 - Developing and help establish “Friends Of” groups to assist with maintenance, cleanup, beautification in high trafficked areas
 - Manage grant application and funding streams for special projects
 - Community relations/outreach

VII. Public Safety

Public safety in our community is a major concern and we believe more investment and efforts should be dedicated to strengthening the capacity of the police force. Community District Five still has some of the highest crime rates citywide. Another primary objective is to expedite the process of acquiring and constructing a new 46th Precinct with parking facilities. This will definitely improve police department services and consequently improve the quality of usable open space available; particularly spaces that are not highly visible and somewhat hidden parks such as Bridge Park, Echo Park, Cedar Park and Aqueduct Walkway in particular.

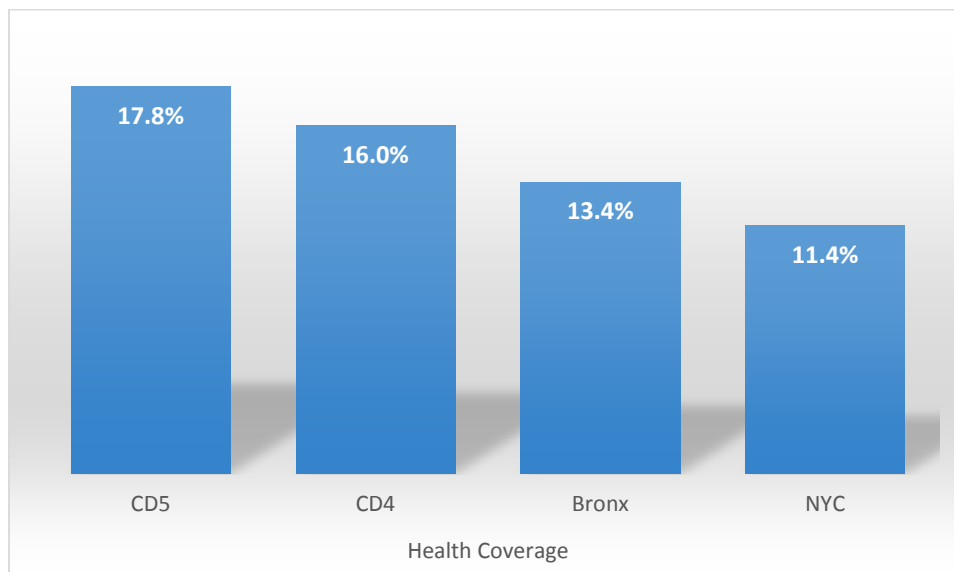
- The local Police Precinct should increase funding for the Operation Clean Hallways Program to stop indoor drug dealing and loitering as this has been a quality of life and public safety issue for our community.
- Funding should be increased for 911 emergency dispatchers to improve response time.
- Funding should be allocated for the construction of a new front entrance ramp to make the existing 46th Police Precinct ADA accessible.
- Funding should be increased for Narcotics' Enforcement and School Crossing Guards.

VIII. Health and Wellness

The following are key statistics from the 2015 Community Health Profile for Community District 4:

- Adults in Highbridge and Concourse are more likely to consume sugary drinks and much less likely to consume fruits and vegetables
- Obesity rate is three times that of Stuyvesant Town and Turtle Bay
- Diabetes 15 percent higher than NYC and five times the rate of Stuyvesant Town and Turtle Bay
- Hospitalization for asthma among children 5-14 is over one and half times the citywide rate
- Furthermore, Bronx County was recently ranked the unhealthiest of all 62 NY counties

Figure 9: Health Coverage



Source: US Census; ACS 2014

The following are key statistics from the 2015 Community Health Profile for Community District 5:

- Within Bronx, the infant mortality rate (IMR) remains extremely high for black women (including African American, African immigrants and non-Hispanic Afro-Caribbean women) in contrast to the average IMR in the borough of at the community level.
- This statistics is quite relevant for Community Board 5 since 33.7 percent of our residents are Black/African Americans.
- Between 2007 and 2009, the IMR surpassed 10 deaths per 1,000 live births for Black women under the age of 20 in the University/Morris Heights neighborhood.
- Also, Bronx Community Board 5 has the 4th highest number of asthma hospitalization in the City

CD4 benefits from a vast and active network of community-based organizations as well as Bronx Lebanon Hospital one of the largest Bronx employers and also has a number of clinics in the district. CD5 has a number of health providers in the area including the Morris Heights Health Center and Montefiore Hospital.

To address the issues related to health and wellness we would like to advocate for more funding for programs and services particularly targeted at youth and low-income families.

- Improving living conditions that contribute to asthma (mice, roaches and secondhand smoke) should be incorporated into tenant protection and preservation strategies.
- Increased funding from The Department of Health and Mental Hygiene to address these two main health issues.
- Increased funding for the expansion of the Pest Control Unit for additional personnel and field inspectors Exterminators.
- Increased funding for teen pregnancy and obesity programs in our District among others.
- *Healthy Bucks and Healthy Bodegas*
 - Bodegas are prevalent throughout CD's 4 and 5. Working with bodega owners and the DOHMH to increase the availability of healthy food options is on the critical path.
- Increase funding for additional programming for fitness and exercise in district parks and recreation centers
- Ensure that all new schools built have ample indoor and outdoor space to promote physical activity
- Leverage funding and programming of Bronx Borough President's #not62 campaign
- Increase funding for DOHMH to work with DOE to improve quality and variety of school lunch program and summer lunch to increase healthy eating
- Increase education and hands on training for children and their families to promote healthy living and lifestyle
- Map and rate all full service grocery stores in the districts and plan strategically with proposed new development for siting new FRESH food stores

IX. Jerome Avenue Study Implementation Working Group

Currently the Jerome Avenue Neighborhood Study is the only *Housing NY*, neighborhood study in the Bronx. In order to ensure that capital, expense and programmatic commitments made as part of the Jerome Avenue Neighborhood Study are fulfilled, Community Boards 4 and 5 propose the creation of a working group.

The working group should be led by Bronx elected officials at all levels as some commitments are directly related to the City budget while others (transit, schools) are not completely within city control.

Other members would include a variety of community stakeholders and a representative from the key agencies:

- Department of Parks and Recreation
- Department of Transportation
- Department of Housing Preservation and Development
- Department of Health and Mental Hygiene
- Department of Small Business Services
- School Construction Authority
- Community Board Four District Manager and/or Chairperson
- Community Board Five District Manager and/or Chairperson

The Working Group would meet quarterly to chart the progress of capital commitments, programming and timelines. Additionally we recommend the development of an online tracking mechanism that would allow any interested party to chart the progress of commitments to capital, expense and programming. This could be a pilot/model that could be rolled out to track all city investments at the Borough level and Community District level.

Each agency would submit a report on all projects and programs agreed upon as part of the Neighborhood Plan for Jerome Avenue. The reports and minutes from each quarterly meeting would be made available to the public.

Appendix

Bronx Community Board 5 Section 197-a Plan Phase I Summary Report (2002)

Appendix

Jerome Avenue Transportation Study, (February 2012)

Appendix

Letter of Support Project H.I.R.E. Application, Bronx Community College (2016)



**Testimony on behalf of CASA re: Draft Scope of Work for the Jerome Rezoning
Paula Crespo, Pratt Center for Community Development
September 29, 2016**

I am Paula Crespo, a planner at the Pratt Center for Community Development, one of the technical assistance providers to the Bronx Coalition for a Community Vision. After working with this group for the last several months and reviewing the draft scope, we have several concerns about the City's upcoming environmental review of how the rezoning will impact schools. I will outline them in the following testimony.

Classroom Utilization Methodology

Even if this rezoning weren't on the table, the conversation about school utilization in Districts 9 and 10 is a critical one. In fact, the City's IBO has already said that over 6,700 new seats are needed in these districts to alleviate current overcrowding. If the rezoning could lead to 11,000 additional residents, including many school aged children, overcrowding will be an even more pressing issue if new seats aren't created.

Transportable classrooms and annex buildings are a fact of life in districts 9 and 10. These facilities are meant to be temporary and the City should not count the school seats in these sub-par facilities when calculating current utilization rates in the DEIS.

Additionally, CEQR's current criteria for determining if there will be a significant adverse impact on school utilization has a critical flaw. Instead of just requiring that the post-rezoning "target utilization rate" be above 100 to make the determination of a significant adverse impact, it *also* requires that there be an at least 5% increase in utilization rates after the rezoning. Given that schools in this area are *already* overburdened, a post-rezoning target utilization rate of anything over 100 should be enough to qualify a significant adverse impact. This point is also relevant to publicly subsidized child care seats.

School Projects Not Currently Under Construction: How they're Used in the Analysis

CEQR states that only schools that are currently *under construction* can be referenced in the *quantitative* analysis of utilization. However, CEQR does allow potential school seats that are neither under construction nor in the School Construction Authority's 5-year plan to be considered in *qualitative* analyses. This is risky. School construction projects, like so many other major real estate projects across the City, are complicated, expensive undertakings that are hypothetical until a shovel hits the ground, so the City should not count its chickens before they hatch.

What and how the City chooses to study as part of the Jerome Avenue rezoning will affect the lives of District 9 & 10 students for years to come. Recognizing the realities of local schools is the first step the City should take in identifying how to support not only incoming residents but current ones. In 2013 87% of students in grades 3-8 failed to meet grade-level math standards. Many teachers in the area are less qualified than their peers across the City, English language learners often don't get the resources and support they need, and discipline and suspension are often favored over giving students with challenges the meaningful and constructive support they need. The City must expand the CEQR manual to measure metrics beyond utilization rates when making decisions about impacts on schools.

Libraries

I have two points to make about how the City analyzes impacts on libraries. The current definition of a library catchment area is a simple ¼ mile radius around the library itself. This geography does not take into account significant physical barriers, such as the Cross-Bronx Expressway, that may make it harder for people of all ages to access a local library. The City must recognize these types of physical barriers and adjust library catchment areas accordingly.

In the past, the City has claimed no significant adverse impacts in cases where an overburdened library's catchment area overlaps with a catchment area of a library with capacity. Nowhere in CEQR does it state that this is allowed, and this should not be claimed in the case of Jerome Ave should such a scenario occur.

Thank you for this opportunity to testify.

For further information, contact:

Paula Crespo, Senior Planner, pcrespo@prattcenter.net, 718-637-8646

Elena Conte, Director of Policy, econte@prattcenter.net, 718-399-4416

NOTE: This testimony was prepared by the Pratt Center for Community Development. It does not necessarily reflect the official position of Pratt Institute.

Testimony for the Jerome Ave. Study Draft Scope
110716

The Jerome Avenue study will have an impact on generations to come in New York City. Below, are aspects that were not adequately addresses in the draft scope. I ask that you include some of these points in the final scope.

A study of how the proposed action may cause indirect displacement by disincentivizing property owners to renew forms of subsidy including Project Based Section 8 properties in the primary and secondary study area. There should be an analysis of the amount of project based section 8 units and their expiration of the subsidy. Because if any of the properties has an expiration, the rezoning might have an adverse effect encouraging owners to leave the subsidy thus indirectly removing affordable housing from the market. I would like to see if the scope cover a breakdown of properties that are going to expire again providing an opportunity for displacement. And how the city will incentivize owners to stay in the program.

By not studying the lots containing multi family homes we are leaving a huge piece of the housing that exist in the zoning area. There is heavy tenant harassment and repair issues in many of the neighborhoods in the study area so rezoning thus having an adverse effect and indirectly displacing some of the rent stabilized tenants in the area.

There should be a traffic study on the Washington Bridge the provides connection from Manhattan to the bronx. The increase in population will severely burden the bridge and its failing infrastructure. Even though it is not in the primary zoning area, it is used by the buses discussed in draft scope.

The environmental impact study should incorporate the, indirect impact in the primary study area, of loss of employment from local residents from the small businesses. The scope does not set up a clear depiction of how small businesses/ automotive will be strengthened and what will be studied to ensure that happens. It is feared that not studying potential job loss because of the change over in businesses, is not taking to consideration the the worst-case scenario.

The Bronx has high rates of Asthma and other air related illness. The scope should look into the direct impact of both potential/ proposed development on the rat population. When there is construction of a building, there is more a disturbance from rats in the area around construction. Since there is a proposal for rezoning of 73 blocks we must consider the health issues that may arise because of rats coming up from the ground.

Testimony from Mariel De La Cruz
mariel.dlc23@gmail.com
212-920-9501



Board of Directors

**TESTIMONY: Jerome Avenue Scoping Session
Bronx Community College
September 29, 2016**

Harold DeRienzo
President

Alyah Hosford-
Sidberry
Vice President and
Chairperson

Harold DeRienzo, President
Banana Kelly Community Improvement Association, Inc.

Rev. Theodora
Brooks
Vice Chairperson

Testimony Focus: The need, and requirement for, a cumulative impact assessment on potential tenant displacement.

Carolyn Waring
Treasurer

A. Basis for a Cumulative Impact Assessment: Under the 1986 Chinese Staff Workers case, when a proposed action is inconsistent with area character and is likely to change neighborhood population patterns and community character, the city is required to consider secondary, as well as cumulative, impacts. The proposed zoning is directly inconsistent with the current area looking to be rezoned. The draft scope's call for affordable housing provisions consistent with Mandatory Inclusionary Housing further supports the need for a cumulative assessment of displacement since MIH and existing Affordable Housing HPD programs exclude the majority of residents in the zoning and surrounding areas.

Lynette Verges
Secretary

Lee Allen
Member

B. Scope of Cumulative Impact Assessment: In assessing cumulative displacement, the President's Council on Environmental Quality explains that consideration should be given to a proposed action's cumulative effects in the context of "past, present, and reasonably foreseeable future actions regardless of who undertakes the action."

Felicia Colon
Member

Vera Roman
Member

Janice Singleton
Member

C. Areas of Assessment: The cumulative assessment for the proposed Jerome Avenue rezoning should cover an area that at the very least covers Bronx Community Districts 1 through 6. Considerations

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Bronx, New York 10459
718-328-1064
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should include, but not be limited to, direct and indirect resident displacement; loss of political power; loss of cultural expression and interaction; loss of access to necessary and affordable goods and services; loss of social networks, destruction of social capital, and loss of institutional affiliations, including churches. [*As an example, see "Some Harlem Churches Fight for Survival," Trymaine Lee, New York Times, 5/23/10.*]

D. Applicability to Jerome Avenue Rezoning: It is necessary to place the Jerome Avenue rezoning in a broader context of past, current and future actions, and within the context of public and private actions. To the North, the Webster Avenue rezoning has already spurred private investment in the surrounding area (see <http://newyorkyimby.com/2016/09/permits-filed-235-west-kingsbridge-road-kingsbridge-heights.html>) for permits filed or anticipated to be filed for market development -- site on West Kingsbridge Road reported on as an example). To the South, there is market rate development ongoing in the Port Morris Section of the Bronx, along with aggressive efforts to "re-brand" the area as the "Piano District," a rebranding approach that has preceded every area being gentrified in the city to date. This market-based development is complemented by the Melrose Common Urban Renewal Plan, substantially developed for affordable housing at 60% AMI and above, which excludes the majority of area residents, targeting "affordable" units for those earning two or more times the incomes of the area residents. To the east, there are plans underway for transforming of the Sheridan Expressway, providing new boulevards and new housing, along with an expanded park and various points of entry for waterfront access. The "impact area" for that proposal stretches from Bronx Park South to the tip of Hunts Point. Now, to the west, there is the Jerome Avenue Rezoning Plan, anticipated to spur the development of over 4,000 units of new housing along 73 blocks, relying on MIH to provide permanent affordability, which is not affordable to the vast majority of local residents, displacing hundreds of jobs, and likely already encouraging displacement and tenant harassment in adjoining neighborhoods by its simple announcement. All of these past, present and anticipated future actions need to be part of the cumulative impact assessment on South Bronx residents as a result of the proposed Jerome Avenue

rezoning.

E. Stated Organizational Proposals Regarding Scope, Approach and Mitigation:

1. All development projects with public subsidy should require affordability levels reaching deeper affordability than MIH or HPD's current ELLA finance program to better reflect the needs of the communities likely to be impacted by this action. A group of CDCs has developed terms sheets for projects that, developed on a not-for-profit basis, can provide for mixed income, affordable units for households earning from below \$25,000 to over \$50,000 a year, distributing the benefits equally among those at 27% AMI, 37% AMI, 47% AMI, and 57% AMI. This should be a mitigation requirement embodied in the development of all City-financed projects.
2. All development projects of a substantial scale should utilize union labor. The Trades Council and numerous trades unions have already agreed to open up apprenticeships for local residents. In this way, in a socio-economic assessment of "winners and losers," local residents will have a pathway to enhanced income and careers as a mitigation measure to offset anticipated rising rents.
3. Certification for ULURP for this Zoning Action Should Not Be Done Until:
 - A Full EIS is completed so that when each step in the review and approval process is taken as part of ULURP, each such entity knows the full impact of what they are voting in favor of, or against. Likewise, each entity can more adequately consider appropriate mitigating approaches to anticipated negative impacts.
 - Enforceable anti-harassment measures or anti-harassment districts are in place to ensure that no permits are issued until it is determined that such development opportunity was not made possible through harassment and displacement of former tenants.
 - City Council Intro 214-A has been passed so that every eligible tenant has a right to counsel in Housing Court.
 - HPD puts in place finance programs that ensure deeper affordability levels more reflective of the impacted areas.

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F. Concluding Comments: In a recent conversation with a city official I was told that zoning in and of itself does not create displacement. That is true to the same extent that guns do not kill people, people kill people. Of course both arguments are absurd on their face. Zoning creates an environment that promotes private development as a matter of public policy. We have seen in gentrified areas throughout the city how this “environment” – whether created by privately-generated economic demand or city-sponsored actions or both – displaces people. Bedford-Stuyvesant is an area that gentrified almost overnight between 2005 and 2009. Coincidentally, this is also one of a handful of neighborhoods that created the most homelessness during this period of time. (See “*Gentrifying Into the Shelters*,” by *Genia Bellafonte*, *New York Times*, 7/6/13.)

Increasingly, many residents in the shelter system who come to our organization for housing were displaced from such gentrified areas. One current resident of a Cluster Site Shelter is preparing to leave the shelter system and become a Banana Kelly tenant. She recounts her experience as a tenant in a gentrifying Brooklyn neighborhood, where new residents referred to her and other long-time residents as “left-overs.”

This attitude on the part of gentrifiers who look down on current residents and feel that they are some kind of pioneers who discover areas for resettlement, are causing residents to view city zoning proposals as promotion of a new form of urban colonialism, where government, investors and developers work together to replace one population group of existing residents for higher income residents who can support not only more privately financed development, but levels of profit deemed acceptable to private, for-profit developers.

I urge City Planning to make sure that the proposed scope of the Environmental Impact Statement takes the most comprehensive direct, secondary, and cumulative assessment of the likely impacts of this proposed rezoning action on existing residents, particularly as it pertains to potential displacement. And further, we call on the City Planning Commission not to certify the review and approval process for ULURP until the recommendations made herein and by the Bronx Coalition for a Community Vision are implemented.



PRATT CENTER FOR COMMUNITY DEVELOPMENT

Valuing and Protecting Auto & Industrial Jobs and Businesses in Jerome Comments on the Jerome Avenue Rezoning Draft Scope of Work

Joshua Eichen, Planner/Manufacturing Retention Coordinator
September 29, 2016

Introduction

My name is Josh Eichen; I am testifying on behalf of the Pratt Center for Community Development where I work as a Planner and Manufacturing Retention Coordinator. As a technical assistance provider to the Bronx Coalition for a Community Vision we have been working to better understand how the potential rezoning may impact local businesses, specifically the auto sector, and have the following comments related to the Draft Scope.

Auto and Industrial businesses will experience significant negative impacts due to the proposed rezoning

The proposed Jerome Avenue rezoning will have a significant impact on auto related and industrial businesses that currently exist in the study area. The Draft Scope rationalizes the displacement of these specialized businesses that provide well-paying jobs with the idea that general retail development is a better alternative which is currently being stifled under existing zoning.

However, the auto repair and industrial sectors pay far higher wages on average -- \$44,000 and \$50,000 per year respectively -- than the retail sector which pays an average of \$24,000 per year. We urge the City to study alternatives to the proposed land use action that would enhance the opportunities for well-paying jobs in the Jerome Avenue corridor instead of dismantling them. The study area has a staggeringly high unemployment rate of 17%¹ and a large population of residents who need access to quality blue-collar jobs.

Assessing and describing job quantities and qualities; a more accurate methodology is needed

The City should employ a methodology that fairly assesses and describes existing jobs in the area and how they are likely to be impacted with and without rezoning action. It should also disclose its methods of calculation alongside any figures included in the Draft Scope. The Draft Scope cites an increase of 1,016 jobs as a result of the rezoning over a “No Action” scenario, yet fails to provide reference as to how this number was determined, what percent of these jobs are expected to pay a living wage and in which sectors, and - assuming this is a net figure - what number and type of job loss it obscures. **Based on the proposed zoning changes, it is likely that close to 75% of the auto sector workforce – hundreds of jobs -- will be displaced.**²

The City’s proposed method for assessing job displacement improperly relies on counts from New York State Department of Labor (NYSDOL) and US Census. The Jerome Ave rezoning geography is far too small

¹ Department of City Planning Jerome Ave Neighborhood Profile

² NETS 2014

for either data set to produce an accurate count of jobs and many of the auto businesses employ workers that would not be represented in official record for various reasons³.

Fortunately, the CEQR technical manual explicitly allows for alternatives, stating that the City can use information collected and published by local organizations to characterize the employment of businesses in the rezoning area.⁴ Department of Small Business Service (DSBS) recently contracted with three local community based organizations (WHEDco, Davidson, and UAMA) to collect detailed data as part of their Commercial District Needs Assessment (CDNA) process. The Department of City Planning (DCP) should incorporate this data as well as other primary methods to base their analysis on – instead of data sets that will grossly undercount the workforce.

Indirect displacement analysis must take into account the importance of clustering

The CEQR technical manual states that “indirect displacement of businesses may occur if a project directly displaces any type of use that either directly supports businesses in the area or brings a customer base to the area for local businesses”⁵ and allows for wide discretion for *how* that analysis can be conducted.

There is an important symbiotic relationship that exists between auto retail and auto repair businesses, and among auto related businesses in general; clustering is essential to the survival of the sector. The City must acknowledge this relationship and employ a methodology that will accurately assess the impact of rezoning on the full Jerome auto economic ecosystem, including the retail component.

“Retention Zones” are Insufficient to accomplish their stated goal; alternatives should be studied

The draft scope of work references four areas, currently zoned C8 and M1 (heavy commercial and light manufacturing), that are excluded from the rezoning as “retention zones” in order to support the auto and industrial sectors. These so-called “retention zones” are grossly insufficient in size and not protected well enough in the plan to accomplish the stated goal. As such, they cannot be classified as policy that will mitigate or reduce the impact of business displacement in any section of the Draft Scope or Environmental Impact Statement. The “retention zones” are not up to the task for multiple reasons:

- **They have little to no vacancy** - The City’s own analysis shows almost no vacant space within the retention zones to accept displaced businesses
- **The retention zones - even in their current state – primarily house non-auto or industrial uses.** More than 50% of the area in these zones are already occupied by other uses.
- **The zones only house a small portion of the Jerome Avenue auto cluster.** Just ¼ of the auto businesses in the area actually operates within them.
- **The existing zoning designation – without additional protections for auto and industrial uses – is insufficient to protect these businesses** against competition from higher paying uses ranging from self-storage to restaurants, which can operate as of right within both M and C8 zones.

³ Workers not on official payroll would not be counted in datasets relying on unemployment insurance

⁴ Section 5-6, 321.2

⁵ Section 5-9, 322.2

- **Because the zones are designed to be separated by high density residential development, the vulnerability of these businesses will increase.** This land use pattern makes it unlikely that existing auto uses will be able to survive in the future there due to market pressures and compatibility issues.

To better support the auto and industrial sectors that exist on Jerome Avenue the City should study a range of alternative versions of the retention zones, including:

- **Expanding the retention zones** to be continuous so as to promote consistent clusters of business activity without conflicting residential uses.
- **Creating additional retention areas** where significant numbers of auto businesses would be protected.
- **Including these retention zones inside the Jerome Avenue special district to enable heightened protection** mechanisms, such as a restriction of allowable use groups to only industrial and auto related businesses.

Summary

We urge the Department of City Planning to take these recommendations into account when releasing the Final Scope of Work and Draft Environmental Impact Statement. Planning for the growth of business sectors that will support good jobs is a critical concern for this community and requires the Department of City Planning to arrive at creative solutions that achieve a positive outcome for the current residents and businesses in the area.

For further information, contact:

Josh Eichen, Planner/Manufacturing Retention Coordinator, jeichen@prattcenter.net, 718-230-6895

Elena Conte, Director of Policy, econte@prattcenter.net, 718-399-4416

NOTE: This testimony was prepared by the Pratt Center for Community Development. It does not necessarily reflect the official position of Pratt Institute.



9/29/2016

My name is:

Pedro J. Estevez

President of, United Auto Merchants Association (UAMA)

Thank you for giving me the opportunity to speak on behalf of the small automotive businesses located in the Jerome Ave corridor slated for rezoning and the vulnerability they are confronting.

As time passes by, and the entire plan from the City of New York to rezone our neighborhood is unveiling in front of our eyes, we welcome the progress, seeing that more affordable housing is going to be available. We appreciate the new development as long as it is fair to every one; to our low-income residents as well as the small automotive business owners located in that zone. But they are experiencing something that is alarming to every small auto related business owner here in the Bronx.

The Jerome Ave corridor is the beginning, which is the home to over 200 auto related businesses that are in the path of the rezoning trend. The reason for these businesses apprehension is because the only zoning they can operate is on C8-M1-3 zone (industrial zone) and that zone is going to be changed to residential and retail.

You may say, they can stay; we are not throwing them out. That's not the case. The case is the certificate of occupancy (C of O), it is what every automotive business needs to obtain their licenses, permits or regulations, and that is the big problem. The certificate of occupancy no longer will have the zoning as before, now is a residential area not a commercial-industrial, in which they were able to operate. That means that they are going to be in violation, and some agencies will shut your business down if you are, others will fine you to death. They already know who is in violation and who is not, they are visiting them already as we speak, imposing them citations and violations that cost them thousands and thousands of dollars.

We welcome the plan that the City of New York has in place to build affordable housing, but at the same time we ask; where is the plan that City have for all those small auto related businesses that are going to suffer and are in danger of being displaced caused by the rezoning? The speculators are all over the place, landlords are not renewing leases, 95% of those businesses are renting, and 73% have less than 3 years lease, or are month to month or without lease.

As we have been stating since the beginning; if the City rezone the area sooner rather than later all automotive businesses the have endured the harshest times since the Bronx burned down, this time was going to be the end of an era for a generation of automotive businesses in the Jerome Ave Corridor if they don't prepare them selves for the future ahead.

Today more then ever we at UAMA feel that a plan must be revealed for the future of the entire auto related businesses thorough the Jerome Ave corridor.

This why we propose this 4 points

1- We are asking that all the businesses located in the area of the Jerome Ave corridor slated for rezoning, must be helped to reach full compliance with City and State Licenses, permits and regulations. This is why UAMA proposed to be the entity that in partnership with SBS could lead the implementation of a compliance program that will help 100 businesses to be fully compliant. This action will be the start of the preparation of these businesses for the future they will be facing, because no matter where they go, they are going to need to be compliant.

2- That UAMA in partnership with SBA establish a program to train 120 businesses owners/mechanics and employees in the latest automotive technology, putting them up to date with the industry ever growing trend. That action will enable them to be preparing them selves for a relocation or retention plan.

3- In order to save all the automotive businesses in danger it was not just fair but wise to build a vertical automotive building (VAMB) in an Industrial Business Zone (IBZ) to house all the automotive businesses not just from the Jerome corridor but those from other sector that are already willing to relocate there. This action will facilitate the acquisition of the much-needed space to continue building housing compounds around the Bronx, this we call this Vertical vs horizontal.

4- To give the opportunity to every business owner participating in this project to be giving the preparation and the opportunity to be owner of they own space. That in turn will not cost the City of New York or the building developer nothing, because the business owners will pay back the cost of the investment plus interest, meaning they will remain there untouched for generations to come.

The business owners of the Jerome Ave corridor are hard working people that have been there for decades and invested not just they live savings to own those business, but their entire life working tirelessly to support their family.

They deserve that the City of New York respect their history.

They deserve that and more. Thank you

Yours truly

Pedro J. Estevez

President & Founder

United Auto Merchants Association (UAMA)



ANHD
50 Broad Street, Suite 1402
New York, NY 10004
Tel: (212) 747-1117

**TESTIMONY OF EMILY GOLDSTEIN, AT
THE JEROME AVENUE NEIGHBORHOOD REZONING
SCOPING MEETING**

September 29, 2016

Good Evening. My name is Emily Goldstein and I am the Senior Campaign Organizer for the Association for Neighborhood and Housing Development (ANHD).

ANHD is a membership organization of New York City neighborhood based housing and economic development groups, including CDCs, affordable housing developers, supportive housing providers, community organizers, and economic development service providers. Our mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. We have nearly 100 members throughout the five boroughs who have developed over 100,000 units of affordable housing in the past 25 years alone and directly operate over 30,000 units.

I'll be testifying specifically on the residential displacement impacts we believe are of concern in relation to the proposed rezoning of Jerome Avenue, and problems with the methodology the Draft Scope of Work proposes to use in evaluating those impacts.

The long stretch of Jerome Avenue being considered for rezoning is surrounded by communities primarily made up of low income people of color. Approximately 45% of residents of Community Boards 4 & 5 have incomes at or below 30% AMI. Another 19% of residents fall between 30 and 40% of AMI. And although rents in the area are lower than in many other parts of the city, they are already above what is affordable for many local residents. In 2014, the most recent year for which we have data, the median asking rent in CB4 was \$1,395, and \$1,250 in CB5, levels already unaffordable to well over 2/3 of existing residents. And rents are steadily increasing. The median rent for CB4 rose by 10.3% from the 2005-09 period to the 2010-14 period. In CB5, the corresponding increase was 7.5%. Unsurprisingly, given the numbers just listed, rent burdening is a serious problem for local residents. In CB4 median rent burden in 2014 was 39.7%, with 47.9% of low income households severely rent burdened. In CB5, median rent burden in 2014 was 45.6%, with 48.5% of low income households severely rent burdened.

The numbers paint a picture of a set of communities in which many residents are already on the verge of being pushed out due to rising rents. A survey conducted by the Bronx Coalition for a Community Vision found that 59% of respondents were concerned about being displaced from the neighborhood.

However, the methodology for measuring indirect displacement in the draft scope promises to severely underestimate the real risk to many local residents because it considers only legal forms of displacement. Over half of the housing units in CB4 & 5 are rent stabilized. In theory, these residents are protected from displacement because they have the legal right to a lease renewal,

and landlords are legally limited as to the rent increases they can impose. In fact, it is common practice for DCP's methodology to automatically assume that rent stabilized tenants will not be displaced, and look no further. But theory is not reality, as the many tenants here today will testify. Reality is that tenants – especially rent stabilized tenants – commonly face a wide range of harassment tactics specifically designed to drive them out of their homes so that landlords can take advantage of both legal loopholes in the rent laws, and insufficient enforcement practices, to raise rents and deregulate apartments. And the displacement of tenants from rent regulated apartments often leads to the deregulation of that apartment, or at least to significant jumps in the legally allowable rent,

As new development, even subsidized development, targeted at a different population with a higher income level increases, the gap between the amount landlords are currently getting in rent stabilized apartments and the amount the local market would bring them – or the amount they *believe* the local market would bring them – increases, further adding to the perverse incentive structure that tells landlords that harassing tenants pays off.

With only the current laws and tools we have, tenant harassment and displacement remains a rampant problem in New York City, and specifically in the Bronx. In the survey done by the Bronx Coalition for A Community Vision, 68% of tenants surveyed reported that their current housing conditions are terrible or fair; 57% reported that they have problems getting repairs done, 27% have been taken to court by their landlord; 27% have lived without basic services and 33% have seen a decrease in maintenance services in their building.

Any method of study that accounts only for legal methods of displacement ignores reality and dismisses the very real threat of displacement to the rent stabilized tenants of the Bronx.

And in looking at possible mitigation strategies, we would caution against assuming that any new development is in and of itself a mitigation for residential displacement, especially if it is not targeted at those in the community who are lowest income, most rent burdened, and generally most vulnerable to displacement. Rather, we encourage the study of the many thoughtful and comprehensive approaches to prevent residential displacement laid out in the policy platform of the Bronx Coalition for A Community Vision, including new, proactive citywide legislative tools that would help to genuinely disincentivize tenant harassment such as a Certificate of No Harassment program, and tools to address the power imbalance between tenants and landlords and protect tenants' rights, such as the Right to Counsel.

“A Rationale for Reconsideration: Legacy M1-2 Zoning along Jerome Avenue”

September 29, 2016

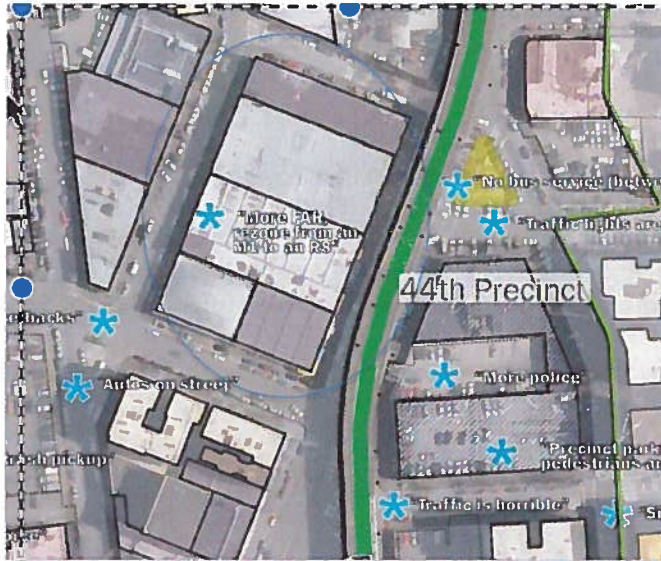


Figure 1: NYC Planning Land Use & Zoning Workshop – November, 2015

Background

The Department of City Planning has proposed a rezoning of the Jerome and River Avenue corridors in the Bronx, running from East 165th Street in the south to west 184th Street in the north and including several cross streets. In general, the proposed rezoning is long overdue. However, while the goals of this rezoning are admirable, there is at least one component of the rezoning, omitting Block 2855 from the rezoning, that works at cross purposes to the rezoning’s general goals.

The odd configuration of the proposed zoning boundaries around Block 2855, which would be seen as gerrymandering were these political district boundaries, make no sense. They retain within the existing M1-2 district properties which meet none of the Department of City Planning’s criteria for retention of C8 and M1 zoning while compromising the DCP’s objectives. Conversely, more modern industrial property currently within the M1-2 but off of Jerome Avenue is proposed for rezoning to permit residential and community facility development.

The community has long supported transforming Jerome Avenue into an active street with residential, retail and community supportive uses and we agree with these goals. The current administration has made housing and community revitalization the centerpieces of the Mayor’s 2014 *Housing New York A five-Borough, Ten Year Plan* which seeks to build or preserve 200,000 units of affordable housing throughout the city with 80,000 of those units in new construction.

Important components of that plan including the establishment of a Mandatory Inclusionary Housing (MIH) program and a liberalization of certain zoning rules have pursuant to the Zoning for quality and Affordability zoning text amendment have already been approved as has one of the neighborhood wide rezoning (East New York). The administration reports that it is ahead of schedule in achieving its goal of 200,000 units within a decade although this success has been concentrated in the renovation and preservation of existing housing. New housing and associated retail and support services are desperately needed and will be even more necessary in the coming years.

- 1271 Jerome Avenue (Block 2855 Lot 65)
- 1280 Inwood Avenue (Block 2855 Lot 42)
- 1275 Jerome Avenue/1288 Inwood Avenue (Block 2855 Lot 45)
- 1295 Jerome Avenue/1298 Inwood Avenue (Block 2855 Lot 44)
- 1299 Jerome Avenue/1304 Inwood Avenue (Block 2855 Lot 53)

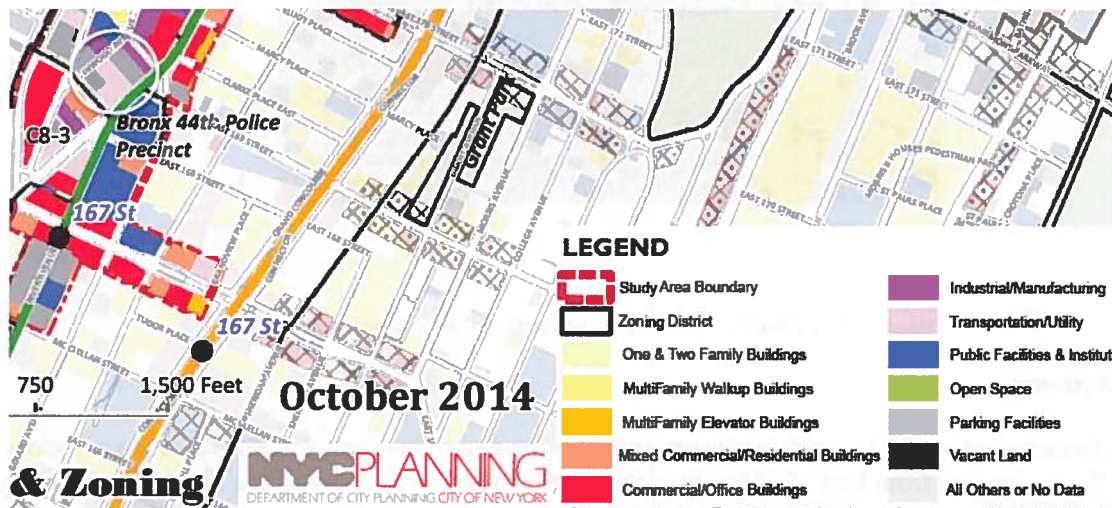


Figure 2: NYC Planning Land Use & Zoning Map – October, 2014

This report is submitted on behalf of the property owners on Block 2855 whose block front bounded by Jerome & Inwood Avenues & West 169th Street to West Clarke Place is frozen in time by legacy zoning.

- These properties are maxed out vertically. Ownership and / or tenants operate parking and automotive repair shops that struggle to be profitable.
- The affected property owners have made their case to a supportive Bronx Community Board Four asking to be included within the Proposed Jerome Avenue rezoning.
- The opportunity to grow these properties vertically would allow for affordable housing, community facilities and local-serving retail. Transit-oriented development would lead to economic growth in an underserved neighborhood, creating wide range of skilled and unskilled jobs, safer sidewalks and improved traffic flow.

Character of Neighborhood

The subject block front lies within the shadow of the IRT #4 elevated train line, surrounded by residential blocks directly to the south. High Bridge is dominated by townhouses and 5 and 6-story apartment buildings. The total land area is roughly one square mile. The terrain is elevated and very hilly. Stair streets connect areas located at different elevations. Prior to the 1960s, High Bridge was a predominately Irish American neighborhood.

Today, the vast majority of residents in the area are of Dominican, Puerto Rican and African American descent. Almost half of the population lives below the federal poverty line. High Bridge is one of the most crowded neighborhoods in all of America. With an incredible 119,031 people per square mile, yet it is among the top 5% of American neighborhoods in terms of walkability. 91.4% of the real estate in the High Bridge neighborhood is occupied by renters, with 79.8% living in large apartment buildings, such as apartment complexes or high-rise apartments.

In the High Bridge neighborhood, 38.2% of the working population is employed in sales and service jobs, from major sales accounts, to working in fast food restaurants. The second most important occupational group in this neighborhood is clerical, assistant, and tech support occupations, with 30.1% of the residents employed. Other residents here are employed in executive, management, and professional occupations (16.4%), and 15.2% in manufacturing and laborer occupations.

The subject block front is 325'x200' located to the Jerome Avenue wide street. Buildings were typically built around 1920. USPS and DSNY facilities are located on the opposite block side of Inwood Avenue. M1-2 Zoning limits building heights to one or two stories block-through.

Existing sidewalk curbs promote automotive uses. Typically cars are double and triple-parked in the Jerome Avenue service road and on three sides of sidewalks. Sidewalks are dirty and poorly lit by public lamp posts. There are no tree pits. The entire site has an E designation due to the plethora of automotive spillages. The 44th Police Precinct has commandeered parking on the West Clarke Place side. Some Yankee Stadium patrons will park on-site during the baseball season.

Residents and workers enjoy excellent public transportation service from the Elevated #4 and the #D subway lines, as well as from Concourse bus routes. Ridership for #4 train @W167th Street is #159, at W170th Street is #169 in MTA rankings. Ridership for C and D trains at W167th Street are #156, at W170th Street are #217 in MTA rankings. South of West 169th Street is a residential community housed in 6-story buildings.

Demographic Imperative

The population of the Bronx, which peaked in 1970 at 1.471 million, experienced a dramatic borough-wide population decline between 1970 and 1980. During that difficult decade, the Bronx population declined about 302,000 people, a drop of over 20 percent. While the decline was swift and devastating, it was also relatively short lived. Since 1980, the Bronx has experienced more than three-and-a-half decades of uninterrupted population growth. The most recent U.S. Census Bureau population estimates put the population of the Bronx at 1.455 million which means that, by 2015, the borough had regained all but 16,000 people – about 5 percent – of the earlier decline. The 2015 population estimate is within virtually one percent of the 1970 population peak.

The population rebound has been accompanied by significant changes in land use patterns. Many of the communities that lost substantial population were previously developed with multi-story walk-up and elevator apartment houses that were demolished in or after the 1970s. Much of the land formerly occupied by these multiple dwellings was subsequently redeveloped with low-rise, lower-density housing. These housing programs were successful in helping to revitalize these neighborhoods but, with the consumption of so much land for lower-density use, there is relatively little land remaining to accommodate future population growth.

The Department of City Planning has prepared population projections of that future growth to the year 2040.¹ By the year 2040, the DCP projects the Bronx will gain an additional 194,000 people over its 2010 census-enumerated population. These projections also included projected population for interim years of 2020 and 2030. Since these projections were prepared in 2013 based on the 2010 enumerated population, the robust post-2010 growth in the Bronx has already propelled the population total for

2015 above the level of the 2020 DCP projection though some of this growth may represent an undercount of the 2010 population. Whether all new population growth or partially representing a better count of the actual population, the U.S. Census estimate of 1.455 million for July, 2015 is roughly 9,000 more than DCP's projection for the year 2020. It is not unreasonable to consider the likelihood that the Bronx is now growing faster than the DCP projections estimated and that the total 2040 Bronx population could exceed DCP's projected 1.579 million. Faster growth will only increase the pressures on the existing housing stock and increase the importance of adding to the supply of housing.

¹ New York City Population Projections by Age/Sex & Borough, 2010–2040, December 2013, http://www1.nyc.gov/assets/planning/download/pdf/data-maps/nyc-population/projections_report_2010_2040.pdf

Looking East at Jerome/Inwood/W169th/W Clarke Place



Figure 3: View from the #4 Elevated Line

The Department of City Planning aggregates population data from census tract into Neighborhood Tabulation Areas (NTAs). The Jerome Avenue Corridor runs along the border adjoining two of these NTAs: High Bridge and West Concourse.

The High bridge NTA, which includes the areas west of Jerome Avenue to the Harlem River, experienced a significant increase in both population and housing between 2000 and 2010. The population increased by almost 3,900 people, an increase of 11.5 percent, while the number of housing units increased by over 1,700 units, an increase of 15.2 percent.

High bridge Neighborhood Tabulation Area ²						
	Population	2000-2010	2000-2010%	Housing Units	2000-2010	2000-2010%
2000 census	33,844			11,520		
2010 Census	37,727	+3,883	+11.5	13,275	+1,755	+15.2
2009-2013 ACS	37,304			13,466		

The West Concourse NTA, which includes the areas east of Jerome Avenue to the Grand Concourse River, saw its population remain stable between 2000 and 2010 while the number of housing units increased by over 500 units, an increase of 4.3 percent.

² New York City Census FactFinder, Department of City Planning, <http://maps.nyc.gov/census/>

West Concourse Neighborhood Tabulation Area ²						
	Population	2000-2010	2000-2010%	Housing Units	2000-2010	2000-2010%
2000 census	39,557			12,708		
2010 Census	39,282	-275	-0.7%	13,254	+564	+4.3
2009-2013 ACS	39,234			13,473		

The Jerome Avenue Corridor provides an important opportunity to provide new opportunities to accommodate sorely-needed housing. While we are not privy to the availability of public sector's commitments to subsidize affordable housing, because any rezoning would be accompanied by the mapping of a Mandatory Inclusionary Housing Area, all housing that would be developed within the corridor subsequent to the rezoning would include affordable housing. Given current market conditions within the area, the rezoning is likely to include many projects with higher levels of affordable housing taking advantage of publicly available subsidies.

The Mayor's *Housing New York A five-Borough, Ten Year Plan* has made transit-oriented development one of the cornerstones of achieving equitable as well as sustainable growth.

Economic opportunity depends not only on affordable housing, but also access to schools, employment, shopping and other services, both within the neighborhood and beyond. **Consequently, our planning will be based upon a Transit-Oriented Development approach. (Emphasis added)**

It makes the most sense to take the full advantage of the Jerome Avenue corridor to the maximum extent possible to support the need for more housing to accommodate the Bronx's population growth. More housing is the only practical response to the increasing strains on the housing supply that results in the bid-up of housing prices. Prices rise for commodities that are in short supply and housing prices, as New York City's experience in recent years has demonstrated, behave in the same fashion as other commodities. New market-rate housing is not the answer for the many New York households without sufficient income to adequately compete for decent housing. That is why combining new housing with the Mayor's new Mandatory Inclusionary Housing Program is so important.

With Mandatory Inclusionary Housing, more housing results in the provision of more affordable housing. The estimated 467-550 new dwellings that would be constructed on Block 2855 would include between 94 and 165 units of affordable housing under the MIH program (with more if one or more the Inwood Avenue ground floors were residential). Given the general market within the Jerome Avenue corridor, it is likely that more than the minimum amount of affordable housing would be provided.

Static Zoning Map

It is remarkable that the zoning map in this area remains the essentially the unchanged from the maps adopted in 1960 that went into effect with the current Zoning Resolution in December, 1961. A review of the 107 historical zoning maps covering the area of the proposed Jerome Avenue Corridor rezoning³ shows only a single rezoning within the area since 1961. This sole rezoning (CP-17765), in March, 1963, was to extend the then existing C8-3 district along both sides of West 181st Street from the midblock between Jerome Avenue and Davidson Avenue to Davidson Avenue. The City Planning Commission described the zoning map amendment as “a minor and logical extension of an existing C8-3 District.” The rezoning was intended to permit a legally non-conforming garage to be used for motor vehicle repairs.

In spite of more than three-and-a-half decades of population growth in the Bronx, there has not been a single rezoning to facilitate residential development along the proposed Jerome Avenue rezoning corridor in 55 years! There has not been a single rezoning to enliven the Jerome Avenue corridor in 55 years! There has not been a single rezoning to promote employment opportunities along the Jerome Avenue corridor in 55 years! Rezoning is long overdue. But this rezoning must be the correct rezoning.

³ <http://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-maps/historical-zoning-maps/maps03b.pdf>, <http://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-maps/historical-zoning-maps/maps03c.pdf> and <http://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-maps/historical-zoning-maps/maps03d.pdf>

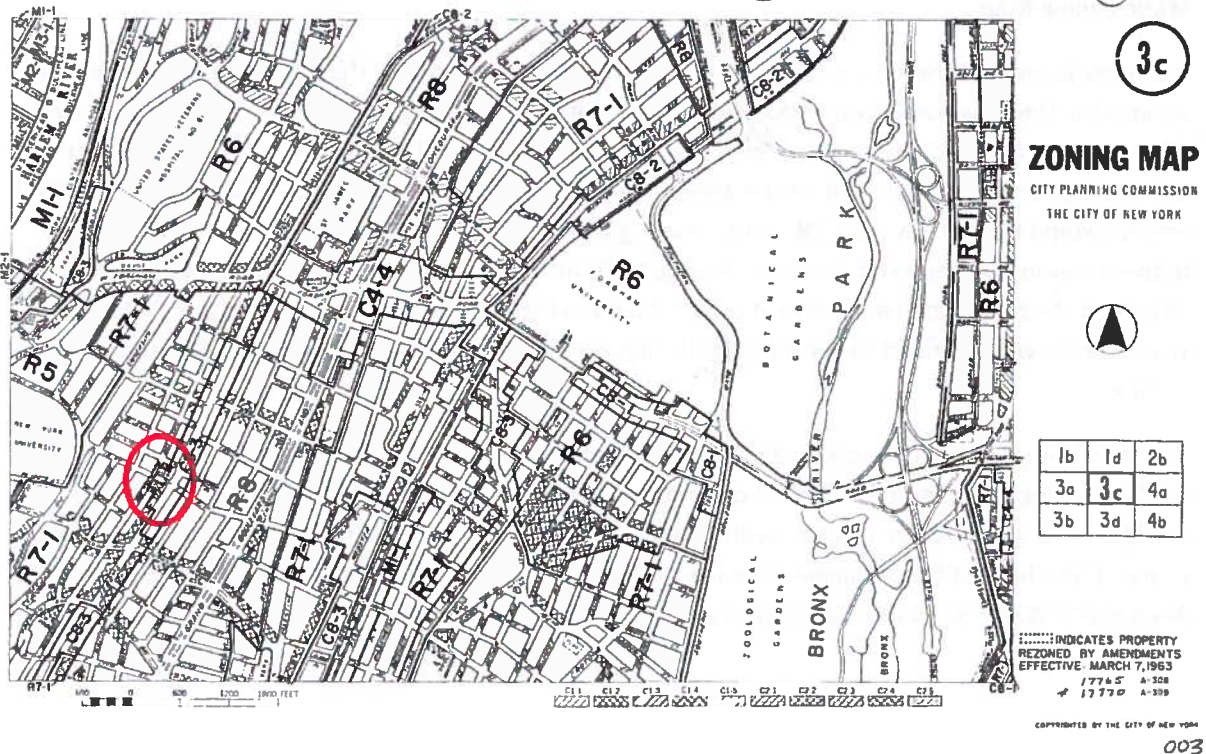
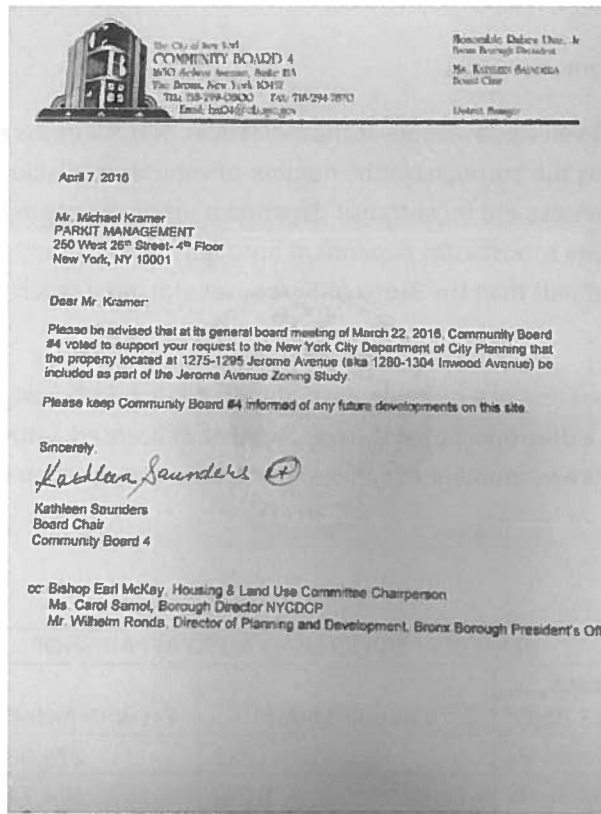


Figure 4: CP 17765

The length of time between re-zonings is a strong argument for undertaking a fully comprehensive rezoning now and not excluding areas from the rezoning because they might be relooked at or re-zoned at a later date. The property owners at the block front of Jerome/Inwood/W169th/Clarke Place West recognize that the site could be transformed into an inviting, walkable, full-service neighborhood corridor. By utilizing the tools of rezoning they envision that there is the potential for a large, ground-floor retail store, i.e. a supermarket, with residential above which would better serve the community in this FRESH food “desert”.

Future rezonings are uncertain at best and, as the history of the Jerome Avenue Corridor demonstrates, it can be decades before an area, once studied, is examined anew.

Bronx Community Board 4 has recognized the need to examine the zoning for this block and written to us requesting the inclusion of Block 2855 in the Jerome Avenue Rezoning Study.



Our recommendations are consistent with the goals of Community Board 4.

“We support the development of affordable housing for moderate and middle-income individuals and families. The lack of affordable housing is contributing to the flight of moderate and middle-income people from our district.

It is in the interest of our Community District to promote economic diversity within our community. The development of the Bronx Civic Center should go hand in hand with the development of moderate and middle-income housing, which will also provide housing for workers in the Civic Center. We are strongly advocating for city and state funds for the middle-income new construction program. We are calling for new codes for new construction and new codes for existing buildings all for sustainable housing development.

We celebrate that after so many years, MTA NYC Transit, has nearly completed an extensive rehabilitation project on the Jerome Avenue Line. The \$42.5 M project will include 167th and 170th Streets, Mt. Eden and the 176th Street stations. The scope of work includes the elimination of structural deficiencies, providing new lighting, ventilation, public address system, signage throughout the station, artwork and new platform edge safety tiles. At last, these improved amenities would afford our community residents not to feel as though they are second class citizens by having them walk into dark, dread and unsafe stations in their travel experience.” (*Bronx Community Board Four District Needs Statement 2016*)

Overconcentration of Automotive Uses

With an estimated 275,000 vehicles available at the residences of U.S. Census enumerated households, the Bronx ranks third among the boroughs in the number of vehicles available. The Bronx exceeds both Manhattan, which is the densest and most transit dependent urban county in the country, and Staten Island, which is New York City's most auto-dependent borough. Staten Island has far more automobiles per household (1.31/household) than the Bronx (0.56/household) but a much smaller population base than that of the Bronx.

Although the automobile has less of a prominence in the Bronx than in Brooklyn, Queens or Staten Island, it nevertheless, has a disproportionately large number of licensed automobile repair shops. Indeed, the Bronx has the fewest number of vehicles per licensed repair shop of any if the city's boroughs.

VEHICLES PER LICENSED AUTO REPAIRSHOP				
Borough	U.S. Census Est. 2015 Pop	# Repair Shops ⁴	Est # Vehicles ⁵	Vehicles Per Repair Shop
Bronx	1,455,444.00	729	275,001	377
Brooklyn	2,636,735.00	1,152	514,740	447
Queens	2,339,150.00	1,313	708,017	539
Manhattan	1,644,518.00	129	198,499	1539
Staten Island	474,558.00	290	234,633	809
TOTAL			1,930,890	534

Relative to the number of vehicles in the borough, the Bronx has licensed automobile repair establishments almost 1.2 times the rate of Brooklyn, the borough with the closest ratio of repair places to vehicles. Even the city's most automotive-oriented boroughs, Queens and Staten Island, have higher number of vehicles per licensed repair establishment. Staten Island had more than twice as many vehicles per licensed repair facility. All of the other boroughs are able to support, repair and inspect far more vehicles with proportionately fewer licensed repair shops.

Comparison of Vehicles per Repair Shop in the Bronx to the Other Boroughs and the Entire City					
	Brooklyn	Queens	Manhattan	Staten Island	Citywide Avg
	1.19	1.43	4.08	2.15	1.47

⁴ Source: <https://process.dmv.ny.gov/FacilityLookup/vsiqEnterFacInfo.cfm>

⁵ Source: http://www1.nyc.gov/assets/planning/download/pdf/data-maps/nyc-population/acs/hous_2014acs1yr_nyc.pdf Assumes an average of 3.1 vehicles/household for households enumerated with 3 or more vehicles.

The concentration of licensed vehicle repair establishments is even more pronounced in a more local geography. The proposed Jerome Avenue Corridor rezoning runs through the northern half of zip code 10452, entirely through zip code 10453 and touches a few of the southernmost blocks of zip code 10468.



Figure 5: Jerome Avenue Corridor Zip Codes

Oddly, the proposed rezoning does not seek to preserve any automotive uses in the one zip code where the number of vehicles per licensed repair establishment exceeds both the Bronx borough average of 377 vehicles per establishment and the citywide average of 534 vehicles per establishment. Within zip code 10468, all of the existing C8 districts along the Jerome Avenue corridor are proposed for rezoning.

VEHICLES PER LICENSED AUTO REPAIRSHOP				
Zip Code	U.S. Census Est. 2015 Pop	# Repair Shops	Est # Vehicles	Vehicles Per Repair Shop
10452	75,371	59	6,981	118
10453	78,309	39	7,926	203
10468	76,103	10	7,698	764

We believe the surplus of auto repair establishments has the effect of making difficult for many of the existing establishments to remain profitable. Indeed, a number of the properties on Block 2855 do not operate as auto repair establishments. 1295 Jerome Avenue should be considered a parking establishment and 1299 Jerome Avenue is occupied by a commercial warehouse and a real estate office. While the proposed rezoning proposes to keep M1-2 zoning on a block with an antiquated building stock on Block 2855 that is only partially used for automobile repair, the most modern auto repair establishments are in the least well-served zip code.

Older Building Stock

There are five buildings on Block 2855 all of which are almost a century old, dating to the 1920s. PLUTO data lists the newest building, 1298 Inwood Avenue, as having a completion date of 1926. The other four are listed with a completion or estimated completion date of 1920. As noted above, two of the five properties on the block - occupying about 46 percent of the block's square footage - are already occupied by uses other than auto repair establishments. The remaining three buildings, which contain a variety of auto repair establishments, struggle to operate under inadequate conditions and a number of current tenants have trouble remaining current on their rent. The age and configuration of the buildings argues against reinvestment to make these more practical auto repair operations.

With the buildings fully covering the lots they are built on there is no room on the sites to add space for automobile maneuverability or storage. As shown in Figure 3, this results in the liberal use of the public sidewalk as well as double parking on adjoining streets as part and parcel of the auto repair establishments. The presence of these establishments negates the Department of City Planning's goal to "create a walkable inviting commercial corridor by promoting non-residential ground floor uses and diverse retail to support community needs."



Figure 6: Jerome Avenue and West 169th Street

The resulting environment is hardly compatible with the residential development that the proposed rezoning would foster on the blocks to the immediate north and south. Future residents would have to run a gauntlet of parked and moving cars on the sidewalk just to go from one residential block to another or from homes to stores or other services in the community. Indeed, as can be seen by looking at a close-up of this establishment, the space in these buildings is so constrained that some businesses use the public sidewalk to store business equipment. Is this an appropriate neighbor for new residences? We do not believe that there is any logic to leaving a virtually impenetrable barrier of parked and moving automobiles that are the consequence of housing automobile repair facilities in inadequate and antiquated structures and sandwiching such uses between future residents within the R7A district proposed to the south and the R8A district proposed to the north.



Figure 7: Business as usual on the sidewalk. This would face a new apartment house under the proposed zoning.

Better Automotive and Manufacturing Buildings Nearby

What a more modern auto repair facility should look and operate like is no secret. Indeed, there is just such a development near the northern end of the proposed Jerome Avenue rezoning between Evelyn and North Streets. As can be seen in Figure 5, this establishment has adequate room to maneuver and store vehicles and leaves the public sidewalk available for pedestrians. Although this structure better serves auto repair business, is less intrusive on the surrounding current or future residents and is even located on a block with a midblock grade change, this site is proposed to be rezoned from C8-3 to R7A with a commercial overlay.

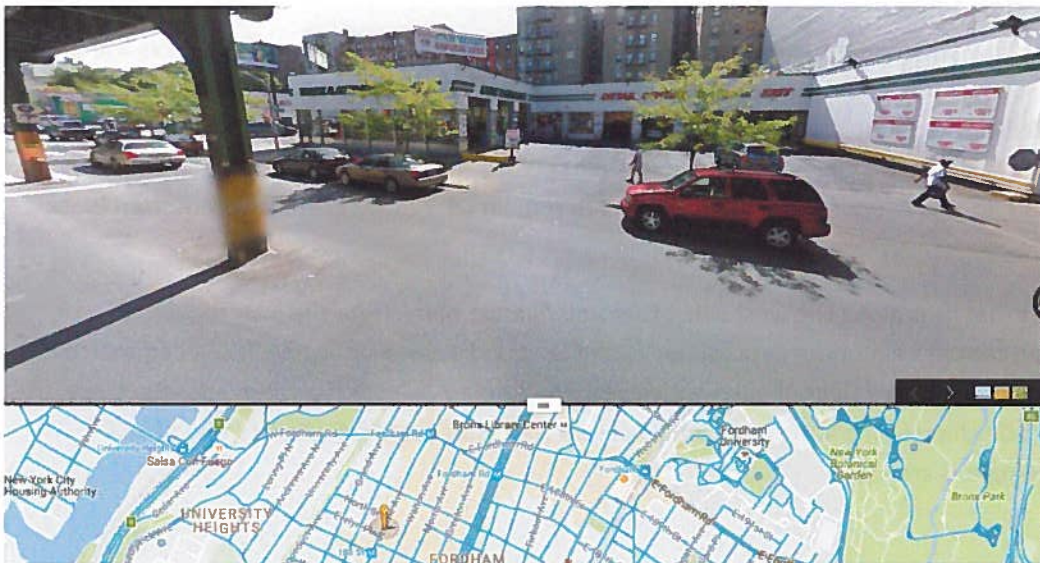


Figure 8: Modern Automobile Repair Establishment

More modern industrial buildings are also located proximate to Block 2855. Indeed, the most modern industrial building in the area – 1342 Inwood Avenue (Figure 6) – listed in the City’s PLUTO data with a completion date of 1990 - is around the corner from Block 2855. It does not front on Jerome Avenue. It has the same current M1-2 zoning as Block 2855. If the proposed rezoning is adopted as proposed it would face a remaining M1-2 district across Inwood Avenue yet it is proposed to be rezoned to R8A.

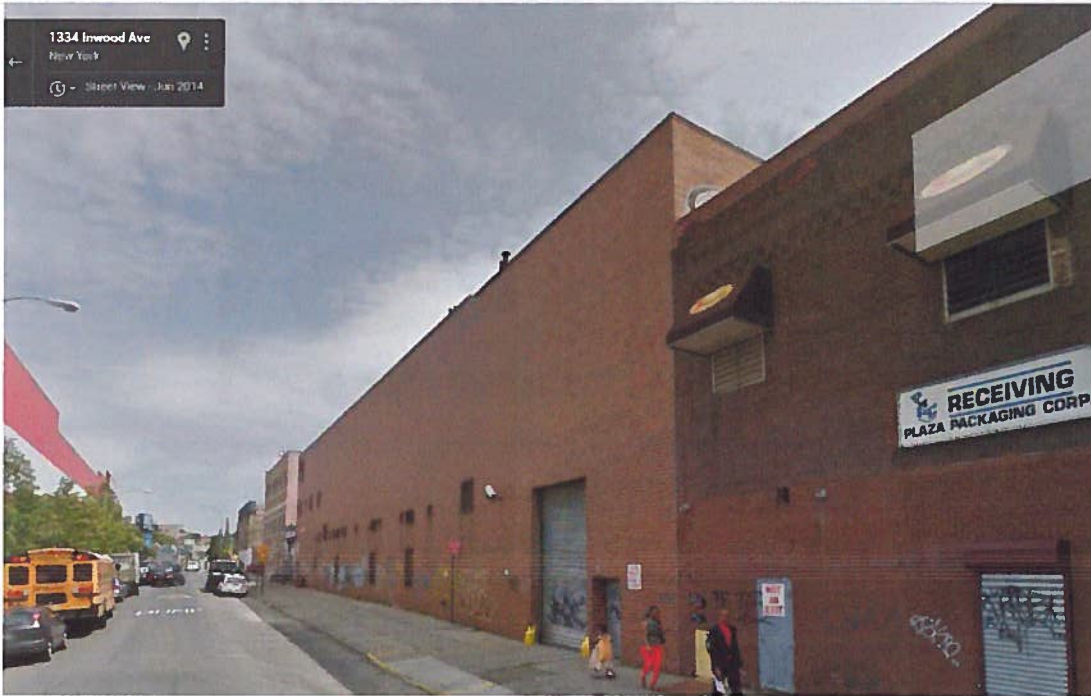


Figure 9: Inwood Avenue Industrial Buildings

Does Not Meet DCP Criteria

The proposed zoning amendment would retain the existing C8-3 or M1-2 zoning in four areas within the study area “to support the preservation of long-operating auto related businesses. These areas were carefully selected based on the number and types of businesses, locations off major street and unique site conditions that would impede redevelopment,” particularly mid-block grade changes. Both of the areas fronting on Jerome Avenue that area proposed to remain C8-3 districts are different from Block 2855.

The C8-3 district that runs along the west side of Jerome Avenue north from the intersection of Featherbed Lane contains a modern gas station, vacant land and several undistinguished commercial structures. The sidewalks are clear of automotive use. The Jerome Avenue frontages are effectively separated by grade changes from the residential uses on Davidson Avenue that were one of DCP’s criteria for keeping this area C8.



Figure 10: Jerome Avenue at Featherbed Lane

The C8-3 district that runs along the west side of Jerome Avenue north from the intersection of West 176th Street contains a New York City Transit Station (which of necessity must remain), some parking establishments and common storefront-type buildings. Here too, the sidewalks are clear of automotive use. Here too, the Jerome Avenue frontages are effectively separated by grade changes from the residential uses on Davidson Avenue. Again, these topographic changes, which were one of DCP's criteria for keeping this area C8, are not present on Block 2855.

Whereas Block 2855 along Jerome Avenue is characterized by automotive uses that actively use the street for business activities, both deadening street life and making the sidewalks unsafe, retaining these uses at their current locations would work at cross purposes with the proposed rezonings to permit residential development to the north and south of the block. In contrast, the other two C8-3 districts proposed to remain along Jerome Avenue are characterized by cleaner uses more compatible with residences proposed to be allowed nearby. Moreover, while the other C8-3 districts on Jerome Avenue proposed for retention are narrow strips that would make it more difficult to site plan developments with the desired setbacks from the elevated subway line, all but one of the Jerome Avenue properties are though lots running between Jerome and Inwood avenues providing far greater site planning flexibility.



Figure 11: Jerome Avenue at West 176th Street



Figure 12: Jerome Avenue at West 177th Street

Employment

Members of the community have expressed understandable concerns about the current sources of employment along Jerome Avenue, with particular concern about how the rezoning might alter automotive-related employment within the corridor.

Without question, the redevelopment facilitated by the proposed rezoning would increase employment. The current land uses along the corridor include vacant lots, self-service gas stations, parking and warehousing uses all of which generate relatively few jobs per square foot. Over time, many of these would be replaced with residential buildings with ground floor retail. Both the retail and the residential buildings themselves would generate employment at higher levels than these low job-generating uses now do. Residential use typically generates one job for every 25 dwelling units. Block 2855 encompasses 65,000 square feet of lot area. With an R8A zoning over Block 2855, an available 7.2 FAR with 1 FAR reserved for retail and/or community facility uses, a total of 6.2 FAR would remain for residential use. This would result in 403,000 square feet of residential floor area and between 467 and 550 dwelling units. In turn, the residential development would generate between 19 and 22 new jobs.

A more significant public discussion is currently underway regarding employment at automobile repair establishments. Standard metrics for the amount of square feet per employee use in New York City use different numbers for retail and automotive repair. Retail is estimated to generate 3 workers per 1,000 square feet while automotive and industrial are estimated to generate 1 employee per 1,000 square feet. It can be expected that, where ground floor retail uses replace existing automotive uses, the employment count is likely to be virtually three times higher with retail than with automotive uses. (Due to the presence of ground floor entrances and lobbies ground floor retail would not replace ground floor automotive uses on a one square foot to one square foot basis.) The increase in employment on sites that are currently used for parking or warehousing would be even greater. The 65,000 square feet available for retail would produce an estimated 195 jobs. Together with the residentially supported employment, the total estimated on-site employment would be 210. Below-grade parking would generate additional employment.

On Block 2855, at least one of the business, C3R mega Auto Diagnostics, is owner occupied. The owner plans to retire in a few years so, regardless of the rezoning outcome, this business will cease to operate within the 10-year buildout period considered in the environmental review. At least one business is a parking garage

Relocation Options

This is not to say that public policy concerns should stop where the number of jobs increases. Those employed in auto repair or auto glass installation are not necessarily the same people who would find employment in the new establishments serving the retail or service needs of residents.

Breaking up Retail and Residential Continuity

Residential Buildings directly across West 169th Street between Jerome and Inwood Avenues



Figure 13: View looking South on west 169th Street

This section of Jerome Avenue (between West 169th Street and Clarke Place West) if left in a perpetual state of M1-2 zoning overlay would interrupt the pattern of potential redevelopment north of Yankee Stadium and up to Burnside Avenue and beyond. Transit Oriented Development of retail spaces would fill the base of buildings, making the existing wide sidewalks once again inviting. No longer would traffic be stopped by double and triple-parked vehicles, and pedestrians would no longer be forced to navigate a dark and dangerous streetscape.

Here we have a “gap-tooth” evident at Jerome Avenue that can be mitigated by the simple adjustment of a boundary line west of Inwood Avenue to enlarge the R8 district, where property ownership are properly incentivized to offer struggling tenants a relocation allowance to co-locate alongside other businesses further north in the Jerome Avenue corridor for greater success.

Development

Block 2855 is uniquely suited to accomplish the planning objectives addressed in the Jerome Avenue Neighborhood Planning Study. Even without the availability of additional subsidies, the block could produce between 81 and 142 new affordable housing units under the Mandatory Inclusionary Housing Program and it entirely possible that a higher share of the units could be targeted to affordable housing. This site would foster job growth, increasing employment opportunities from an estimated 91 jobs today to over 210 jobs when the block is fully developed. Redeveloping this block with housing with ground floor retail or community facility use would replace a block that is hostile and dangerous to pedestrians with a block that is lively and inviting, providing seamless connections to future redevelopments to the north and south.

With three of the five lots on the block as through lots, the sites can be designed to maximize light and air to the Jerome Avenue frontage by placing more of the bulk away from Jerome Avenue. Moreover, with the owners of four of the five lots cooperating, it is possible to take a full advantage of the design possibilities of the site, including not only setbacks from Jerome Avenue but useful tenant (and perhaps publicly accessible privately-owned) open space and replacement of the existing parking and with the parking some additional employment.

The property owners have made tentative plans to develop one or more “as-of-right” residential buildings on this site, subject to inclusion in the final Jerome Avenue Rezoning. They anticipate that as many as 165 AMI Affordable apartments would be created, along with mixed-income units that are targeted towards the municipal workforce, including public safety officers and teachers. They have had preliminary conversations with Bronx Community Board Four and are sympathetic to their call for mixed-income housing to revitalize neighborhoods like High Bridge. With a greater economic spending base, they can develop better retail options than those which are presently within walking distance.

Owners are looking into utilizing the large, block-through footprint to bring in a supermarket through the FRESH program. Stores that benefit from the FRESH program must also meet the following criteria:

- a. Provide a minimum of 6,000 square feet of retail space for a general line of food and nonfood grocery products intended for home preparation, consumption and utilization;
- b. Provide at least 50 percent of a general line of food products intended for home preparation, consumption and utilization;
- c. Provide at least 30 percent of retail space for perishable goods that include dairy, fresh produce, fresh meats, poultry, fish and frozen foods; and
- d. Provide at least 500 square feet of retail space for fresh produce.

Bronx Community Board Four has also made property owners aware of the need for more school seats in the district. It may be possible to work with the Department of Education to provide sufficient classroom space in the lower floor(s) of the building.

Summary

The property owners of Jerome and Inwood Avenues, West 169th Street to West Clarke Place have produced this report to buttress their case for inclusion in the Jerome Avenue Rezoning effort.

Our research has concluded that there is no dearth of auto repair shop options available to Bronx residents. In fact, the area is "over-served" relative to the other four boroughs. The most viable business, Mega Auto Diagnostics, is an anomaly amongst repair shops as the owner/operator of its property.

This block front is a conspicuous "gap" for the continuity of a rezoned Jerome Avenue Corridor. Its size and potential for setbacks from the elevated train creates an opportunity for a sizable amount of affordable housing units, for larger and better retail, and for a community facility that might generate the school seats needed for an increased residential population.

**Our research has concluded that there is no dearth of
Auto repair shop options available to Bronx residents.**

The current owners, Neftali Fuente, the principal of Mega Auto Diagnostics and the Spindler and Zeevi families believe that the properties on Block 2855 to support and expand on the future envisioned by the proposed Jerome Avenue Rezoning. The Spindler and the Zeevi families are "emerging developers" who have considerable experience building mixed income housing and have outlined future plans with their neighboring property owners to combine lots to achieve these goals.

We look forward to our inclusion as an R8A in your Jerome Avenue rezoning recommendations.

**Report Prepared by Sandy Hornick, consultant to Sheldon Lobel, P.C.
And Michael Kramer of Urban Strategist.**

APPENDIX

West 169th Street/Jerome & Inwood Avenues/West Clarke Place

1271 JEROME	1280 INWOOD	1275 JEROME 1288 INWOOD	1295 JEROME 1298 INWOOD	1299 JEROME 1304 INWOOD
2855/65	2855/42	2855/45	2855/44	2855/53
75' X 100' (1)	75' X 100' (1)	100' X 200' (1)	100' X 200' (2)	50' X 200' (2)
7500' SF	7500' SF	20,000 SF	40,000 SF	20,000 SF
Y&L Auto Repairs	C3R Mega Auto Diagnostics	Bienvenido Parking Y&L Multiservices	Bienvenido Parking	City Store Fixtures
Vasquez Muffler Auto Glass	F&C Auto Body Shop	Reilly Construction	Graphics Installations	Apparel Retailer

Lot Size 65,000 SF	R8QH FAR 7.2	120' Height	468,000 SF Buildable Community Facility	550 total units mixed income
335 Potential Underground Parking Spaces	400' Frontage 40,000 sf Potential Retail	12 Stories Setback	Potential Tenant: New Light Baptist Church 300 Congregants+After-School Programs Potential Site: K-5 School Seats	165 AMI Affordable Apartments

Testimony of Sandy Hornick at the Scoping Session for the Jerome Avenue Rezoning

CEQR No. 17DCP019X

Gould Memorial Library, Bronx Community College, 2155 University Ave, Bronx, NY 10453

Thursday, September 29th, 4:00 PM

Good ~~afternoon~~, ^{evening}

My name is Sandy Hornick. I am a land use consultant working on behalf of property owners on Block 2855 which is between Jerome and Inwood Avenues and between West 169th Street and West Clarke Place. I am here today to request that the scope of the environmental review be revised to include an analysis of the rezoning of this block to an R8A district with a C2-4 commercial overlay, consistent with the proposed zoning immediately to the north of this block

The Department of City Planning's proposed rezoning of the Jerome and River Avenue corridors, running from East 165th Street in the south to west 184th Street in the north and including several cross streets, rezoning is long overdue. The zoning here has remained unchanged since 1961. However, while the goals of this rezoning are admirable, there is at least one component of the rezoning, omitting Block 2855 from the rezoning, that works at cross purposes to the rezoning's goals and counter the DCP's own criteria for selecting areas for rezoning.

The resulting odd configuration makes no sense. It retains within the existing M1-2 district properties which ~~meet none of~~ ^{do not} the Department of City Planning's criteria for retention of C8 and M1 zoning while compromising the DCP's objectives. ^{and more modern auto repair facilities are} Conversely, more modern industrial property ~~currently within the M1-2 but off of Jerome Avenue~~ is proposed for rezoning to permit residential and community facility development ~~as is more modern auto repair facilities~~ elsewhere on Jerome Avenue. DCP's own criteria of retaining existing zoning on Jerome Avenue blocks with a significant grade change does not apply on Block 2855.

POPULATION

By 2015, the population of the Bronx had largely recovered from the disastrous 1970s, regaining all but 16,000 of its 302,000-person population loss. Its 2015 population of 1.455 million is already roughly 9,000 more than DCP's projection for the year 2020. It is not unreasonable to consider the likelihood that the Bronx is now growing faster than the DCP projections estimate and that the total 2040 Bronx population could exceed DCP's projected 1.579 million.

Faster growth will only increase the pressures on the existing housing stock and increase the importance of adding to the supply of housing and with that ^{maximize} new affordable housing. These borough-wide pressures on the housing stock are matched at the local level where rapid population growth since 1980 has already used much of the available residentially-zoned land. Zoning needs to accommodate more housing.

OVERSERVED BY AUTO REPAIR

The Bronx is already considerably more overserved with auto repair establishments than any other boroughs. For the borough, there are 377 passenger vehicles for each licensed repair shop. In comparison there is 447 in Brooklyn, 539 in Queens, 809 in Staten Island and over 1,500 in Manhattan. Locally, the disparity is even greater with only 118 vehicles per repair establishment in zip code 10452 which includes Block 2855. *- Repair shops and employment could be better dispersed.*

ENVIRONMENTAL DEGRADATION

These auto repair establishments operate in aged and inadequate facilities on Block 2855. This forces the businesses to use the sidewalks for the storage and movement of vehicles and even the storage of business equipment as can be seen in this photo from Google Streetview. With a rezoning to promote residential development directly to the north and south of Block 2855, retaining these uses on Block 2855 will compromise the quality of life and the safety of future residential neighbors.

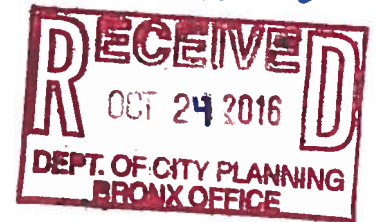
EMPLOYMENT

The current uses of the block, which include parking, low-end retail and auto repair generate an estimate 91 jobs today whereas redevelopment would more than double employment opportunities to roughly 215. The retail would support local residents and link together future commercial strips to the north and south.

This block needs to be rezoned and the scope of the environmental review should be expanded to cover such a rezoning.

Thank you.

Michael



To Whom It May Concern:

My name is Olivia, I live in Crown Heights. I have lived in Brooklyn for 2 years.

I learned about New York City's plan to rezone more than 70 blocks in the Bronx in the Jerome Avenue area through my good friend and Vassar college roommate, Katie Duarte; a friend in CASA (Community Action for Safe Apartments). Katie has grown up in the neighborhood that is planning to be rezoned and I want to help make sure that the rezoning will not hurt her or the well established dynamics of her neighborhood. I believe the City should take the necessary steps to make sure that the Jerome Avenue Rezoning Plan benefits current Bronx residents. These are various key ideas that should guide the rezoning:

1. **Anti-displacement strategies for current residential and commercial tenants.** Current tenants and small business owners will not benefit from the rezoning if the rezoning increases rents, speculation, and the forces of displacement. The City should take steps to ensure that the people and businesses that are here now are protected and are able to stay.
2. **Real affordable housing.** All of the new housing built in the community should be at rent levels that reflect the need in the community.
3. **Good jobs and local hire.** New construction and businesses will mean a lot of new jobs in the area and the City should guarantee that those jobs create career opportunities for local residents. Also, developers should not be allowed to build unless they commit to using contractors that are part of State Department of Labor Registered and Approved Apprenticeship programs.
 - a. **Safety and training.** There recently has been an alarming increase in construction worker fatalities and life changing injuries in New York City. 18 construction workers died in the field from the beginning of 2015 to date. The City must mandate provisions for worker safety and training to ensure our most vulnerable workers are protected.
4. **Real community engagement.** Residents need to have a say over what happens in the community, and the City should have long-term tools to ensure accountability for implementing commitments made during rezoning approval process, including a role for community in overseeing progress. The community needs this to ensure that the rezoning is actually part of a community plan that is effective and fully implemented.

I am asking that the Department of City Planning take these central ideas as core values in the continued planning of the Jerome Avenue rezoning in the Bronx.

In addition, the City should implement the following policy recommendations in order to insure the well-being and protection of current Bronx and New York City residents:

Anti-Displacement and Anti-Harassment Policies for Residential Tenants:

- Pass and Fund Intro 214, providing a right to counsel for low-income tenants facing the loss of their home in New York City. According to an independent study, Intro 214 would fund itself since it would lessen the City's financial burden in supporting the would-be evicted tenants in the shelter system. In addition, Intro 214 would make housing court fairer by allowing a reasonable arena for landlords and tenants to come to mutual agreements, leading to less evictions.
- Pass legislation enacting a citywide certificate of no-harassment that would be in place before the plan for Jerome Avenue applies. Passing a no-harassment policy would help discourage landlords from harassing current tenants in a ploy to occupy their apartments with tenants that pay higher rents.

Anti-Displacement for the Commercial Tenants and Auto Workers on Jerome Ave:

- The City should ensure that the auto workers do not lose their livelihoods. This can be done by enhancing the retention areas, identifying relocation locations, as well as ensuring that all businesses are in compliance. The auto workers that currently work in the Jerome Avenue area are--in a lot of cases--immigrant workers with limited formal schooling and years of experience and dedication in the Bronx auto industry. If the City is taking away these workers and small business owner's auto shops away, the City needs a plan ahead of time to counteract the displacement for these workers.

Good Jobs, Local Hire, Safety and Training:

Public funds come with public responsibility. Tax-payer funded subsidies used by developers and contractors to build affordable housing should provide good wages to help the community create more middle class jobs; require utilization of the State Department of Labor Registered and Approved Apprenticeship Program; and demand the highest level of safety training available to ensure safe working site and communities.

- The City should provide funding for programs to ensure that local residents are eligible and prepared for the state certified apprenticeship programs, including GED programs, stipends and childcare;
- The City must also adopt local hiring requirements for the rezoned area. This can be done either through the creation of special purpose districts that mandate local hire and/or through an executive action that mandates local hiring for all projects using city subsidies;
- The City must mandate provisions for worker safety and training to ensure our most vulnerable workers are protected. Developers should not be allowed to build unless they commit to using contractors that are part of a NYS approved apprenticeship program.

Real Affordable Housing:

- The City should ensure that new housing reflects the needs of current neighborhood residents, including rent levels affordable to the current community. This should be done through the creation of a special purpose district that mandates real affordable housing and local hire, and/or through the creation of a new HPD term sheet that will match the AMI levels prevalent in the community;
- The City should create new requirements for developers seeking public subsidies that take into account current Jerome Avenue residents income levels.

Real Community Engagement:

- Create a formal opportunity for community oversight of the plan's implementation.

I believe that we are at a moment where we face a challenge to do zoning in a different way. I believe that my suggestions and the plan presented by the Bronx Coalition for a Community Vision lays out a roadmap to achieve progress and change without exploitation, harassment, and displacement.

Sincerely,
Olivia Kavanaugh

**New York City Department of City Planning
Jerome Avenue Neighborhood Planning Study Environmental Scoping Meeting
November 7, 2016**

LiveOn NY thanks the Department of City Planning in opening this forum to ensure that voices throughout Jerome Avenue, the Bronx, and the rest of New York City are given the opportunity to be heard.

At the core of LiveOn NY's mission is the desire to make New York a better place to age. Supporting efforts within the rezoning process that will account for the senior perspective and further a senior's ability to age in place will truly make Jerome Avenue and the surrounding community a better place to age.

The ability for a senior to successfully age in place can largely be dependent on their community resources and the thoughtful decision making during planning processes such as the one Jerome Avenue has embarked on.

One key feature of aging in place is the availability of accessible and affordable housing. LiveOn NY recently conducted a survey which found that over 10,000 seniors in the Bronx currently sit on waitlists to secure affordable housing. This extreme need will only be exacerbated by demographic increases, which estimate the population of seniors in NYC to increase to a diverse 1.8 million individuals by 2040. Further, many affordable housing units are in desperate need of repair, and a lack of options exists all over as the vacancy rate below 4%

Affordable housing within one's community helps to prevent social isolation, and better cognitive outcomes. Further, according to HUD aging in place can reduce rates of depression, improves outcomes related to activities of daily living, and protects one's social connections.

Zoning to allow for increased production of affordable housing is one component to combatting New York City's official state of housing emergency. Beyond this, however, all buildings, residential included, must be built for accessibility. Features of this include wide hallways to allow for a wheelchair, staircase alternatives, and handrails to prevent falls, among others.

HUD has found that 89% of American's over 50 wish to age in place. This statistic, and the aforementioned health benefits, highlight the need for community preference to be utilized when filling affordable units. In a gentrifying city, the improvement that is coming to Jerome Avenue should benefit, at least in part, the individuals who have spent decades building the community's character.

Zoning must also allow for the inclusion of recreational facilities that serve all ages. For example, senior centers offer vital opportunities for socialization, nutrition, and services for seniors. A wealth of resources, senior centers, and other recreational facilities can help improve a senior's quality of life.

In many cases, community planning through a senior lens serves to benefit the entire community. For example, even-surfaced, walkable sidewalks not only prevent falls for older adults, but make smooth navigation for parents with strollers or individuals with mobility impairments.

Other components to an age friendly community include accessible transportation, access to nutritious food, availability of wellness programs, and accessibility of health providers. A vision for a well-rounded and age friendly Jerome Avenue, should be a vision that includes the aforementioned tenements and considers the community from a senior perspective.

LiveOn NY looks forward to continue supporting efforts to revision Jerome Avenue as a better place to age.

Thank you for your time.

LiveOn NY is dedicated to making New York a better place to age. Founded in 1979, with a membership base of more than 100 organizations ranging from individual community-based centers to large multi-service organizations, LiveOn NY is recognized as a leader in aging. LiveOn NY's membership serves over 300,000 older New Yorkers annually and is comprised of organizations providing an array of community based services including elder abuse prevention and victims' services, case management for homebound seniors, multi-service senior centers, congregate and home-delivered meals, affordable senior housing with services, transportation, NORCs and other services intended to support older New Yorkers. LiveOn NY connects resources, advocates for positive change, and builds, supports and fosters innovation. Our goal is to help all New Yorkers age with confidence, grace and vitality.

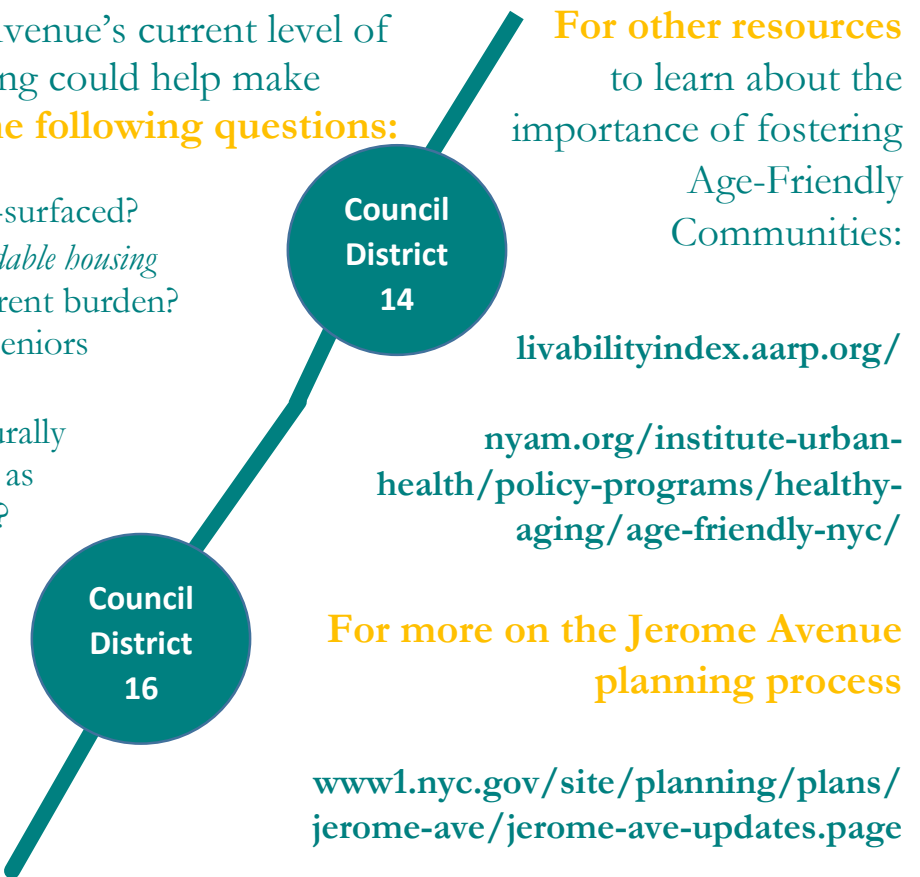
Raising the Discussion:

Visions for an Age-Friendly Jerome Avenue

Stretching over 5 miles, 5 zip codes, and 2 council districts in the Bronx, a portion of Jerome Avenue is set to be rezoned, a process that will shape the street and its surrounding communities for years to come. During this process, it is important to integrate livable features for all ages, including seniors. By emphasizing the importance of zoning for age-friendly communities, local elders are more likely to lead longer, healthier lives.

When thinking about Jerome Avenue's current level of Age-friendliness, and how zoning could help make improvements, **ask yourself the following questions:**

- Are *sidewalks* and *crosswalks* even-surfaced?
- Are there opportunities for *affordable housing* that does not create an extreme rent burden?
Are these options accessible to seniors (i.e. no stairs)?
- Are there opportunities for culturally appropriate *social engagement* such as arts, senior centers, and libraries?
- Is there an adequate supply of *healthcare* providers?
- Is there adequate access to *food?* *Parks?*
- Are *transportation* options available and accessible?
- Do you feel seniors are *welcome* in the community?



Whether utilizing this resource at a community planning event or as an independent user, it is important to **share input with your City Council Representative.**

While the map outlines Jerome Avenue and can help give you an idea of each Council District, to determine your specific representative, check out this resource:

council.nyc.gov/html/members/members.shtml

For more information, please contact: *Bobbie Sackman, Director of Public Policy, (212) 398-6565 x226, bsackman@liveon-ny.org or Katelyn Hosey, Housing Policy Analyst, (212) 398-6565 x244, khosey@liveon-ny.org*

Buenas noche, Gracia por la oportunidad de esponel frente a ustedes mi testimonio. Mi nombre es Lourdes Garcia. Soy Lidel de Casa Organización de acción Comunitaria por apartame-
ntos Seguros.

Ye vo viviendo 36 año en el 1590 Undercliff ave en el Bronx.

Comparto el apartamento Con mi esposo y hija de 18 año.

Como residente del Bronx, me preocupa el gran impacto que Traeria la rezonifi-
cación en la avenida de Jerone y sus Corredores y queremos dejarles saver que estamos en contra del Plan de la Ciudad y pedimos que estudien Todas sus formas y efectos a nivel de Población medio ambiente, Transportación, Desplaza-
mientos y Departamento Legal.

La Ciudad deberia promover el desarrollo de viviendas asequibles para todos y garantizar que las nuevas viviendas reflejen las necesidades de los actuales Vecinos del barrio, ademas debe proporcionar Capacitación para el Trabajo y la educación a los residente locales. y Tambien evaluar las necesidades existentes en los barrios afectados por la rezonificación. no podemos permitir que el Proyecto de la Ciudad avance sino toman en cuenta nuestras demandas.

Creemos que este Plan es mas de reubicación, aburguesamiento y Desplazamiento. Decimos no al Plan y sí al Bronx.

Marie B. McCullough
779 Concourse Village East
Bronx, NY 10451
CB4 member

10/7/16

To Whom It May Concern;

I attended the Scoping session @ BCC and made a few comments but to keep within the time allotted I stated I would email additional comments. I will however reiterate some points I made that morning because they are quite crucial to this endeavor which is very ambitious but much needed.

Housing should be mixed income and within the affordability of the residents presently residing in CB4 and 5 both of which have incomes lower than the Bronx as a whole and very definitely the city. The mixed income would allow for greater diversity which I feel makes a community strong.

The construction which takes place should employ people within the Bronx but specifically the involved Boards 4 and 5. I do support union workers and I support internship/apprentice programs which train young people particularly in construction skills which will help them gain employment and financial growth and security.

Though affordable the workmanship, quality of materials used and compliance with codes etc. should be of the standards used for high income housing and not be shoddy constructs to cut corners and keep costs down.

The housing should be available for the increasing senior population, the disabled, veterans, homeless and the mentally ill.

With this increased population the transit system must be improved in terms of numbers of buses and trains and timeliness of schedules. Access a Ride also needs to be improved for the population requiring its services. The lack of elevators and/or escalators within the corridor for the 4, C and B lines is not acceptable and should be remedied. The underpasses at certain cross streets need to be kept cleaner, well-lit and safe so they can be utilized without fear for ex. the 161St. underpass still has leaking and H₂O runoff during inclement weather but I would be remiss to not acknowledge that other improvements have been made.

I cannot ignore the fact that private vehicle parking is now and will increase to be an issue. This must be addressed. The idea that parking and affordable housing are in some way mutually exclusive must be revisited and a workable solution arrived at. People should not have to pay the equivalent of rent prices for their parking spot and they should not have to walk extreme

distances and in isolated, possibly dangerous neighborhoods to reach their homes or vehicles. Like the telephone, the need for a car is not a luxury; it has rapidly become a necessity.

Increased population calls for improved and increased health services, and schools, appropriate for all ages; this includes mental health services as well. It also calls for police, fire and emergency services. Services should not only be to intervene when situations occur or are present but to educate and prevent occurrence. Assisting people in taking control of their situations is extremely important. Education of the children, keeping youth in school, educating adults, helping people become more proficient in English, offering job training, trade/skills training is an absolute necessity. A great focus must be placed on getting and keeping the people out of the economic and educational abyss that the districts are in. Nothing will ever change if the educational and economic status remains stagnant.

In keeping with this theme is the need for healthy food markets and restaurants. To improve the health status of the population is right up there as a necessary goal.

Parks and open spaces offers a very interesting sociological phenomenon; their usage for parties and cookouts. The sidewalks are also used in the same way. People seem to feel that nature is to be used for their enjoyment; how this is handled is another challenge.

I am concerned about the state of playgrounds for the children. The equipment needs to be modernized, the surfaces made safe, more division of areas according to age (the older kids can cause havoc for younger ones) with the age appropriate equipment and equipment which not only helps the development of motor skills but creative self-expression.

The youth need after school programs, Boys and Girls Clubs and Ys need to be in this area. Similar facilities are needed for adults and the elderly. Such sites are good for educational, socialization and entertainment purposes but are safe havens as well.

With the increased building and disruption of land there will be an increase of air pollution. To which I will add vehicular emissions. Respiratory illness, not just asthma the latter of which is very high in this area is among the leading causes of hospitalizations and mortality worldwide. This protection of residents and workers from these hazards is important. Additionally processes should in place to test and rectify land which has been used to house factories, garages, automobile body shops for dangerous, toxins, carcinogenic substances before any other structures are built there. There needs to be an ongoing program to monitor these areas to assure that the environment remains safe, pollutant free and the water is clean and safe for consumption. In keeping with the construction is noise pollution. How will this impact the neighborhood? Are there schools, nursing homes, hospitals within the area; what will be the effect on residents having to go to work etc.?

The issue of displacement of residents from their homes or people from their businesses, very troubling. I would hope that the possible reasons which could lead to the displacement have been enumerated as much as possible and plans put into place to help people avoid this from happening and if this is not at all possible, plans to help them arrive at the best solution possible.

Supportive services are needed in critical situations such as these because the disruption of one's life can be catastrophic.

Bishop Earl McKay-Affordable Housing (specifics on income bands and AMI's)

The Draft Scope of Work (DSOW) states **“Between 2005 and 2015, more than 80% of all new housing units in Community Districts 4 and 5 were subsidized affordable units.”** However, the DSOW gives no indication at what levels of affordability (AMI's) these units were developed. Furthermore, the DSOW indicates that the proposed actions could potentially result in the **development of 3,250 new dwelling units.**

The EIS must **include a detailed analysis** of the housing that has been developed and subsidized by the City in the past ten years, including AMI's, rents and term sheets as well as any trends during those periods.

As the DSOW indicates, **the median household income of the surrounding area is \$25,900** and conversely 25% of households earn more than \$50,000. As stated in the joint CB4/CB5 platform, **Community Board Four fully supports a range of housing for all income earners, but advocates for a greater emphasis on middle to moderate income tiers** to create more **income diversity in the district.**

Two Areas of concern
1. More Detail Analysis of Income Bands (AMI)
2. Income Diversity
EIS impact statement

Counts are on
1. INCOME BANDS (AMI)
2. Income Diversity
(3) more Detailed Analysis of Income Bands (AMI)

2) More Income Diversity

|||

From: [Jerome Avenue Study \(DCP\)](#)
To: [Evren Ulker-Kacar \(DCP\)](#); [Annabelle Meunier \(DCP\)](#)
Subject: FW: WHEDco_Written Comment to the City of NY/DCP on the DRAFT Jerome EIS Scope
Date: Tuesday, October 11, 2016 10:52:26 AM
Attachments: [WHEDco_Jerome Draft EIS Scope Comments_100716.pdf](#)

From: Kerry McLean [mailto:kmclean@whedco.org]
Sent: Sunday, October 09, 2016 4:51 PM
To: Jerome Avenue Study (DCP) <JeromeAvenue@planning.nyc.gov>
Cc: Nancy Biberman <nbiberman@whedco.org>; Alix Fellman <AFellman@whedco.org>
Subject: WHEDco_Written Comment to the City of NY/DCP on the DRAFT Jerome EIS Scope

Dear Jerome Avenue Planning Team for the City of New York,

Pertinent to the Proposed Jerome Avenue Rezoning, please find attached the official written comment by the Women's Housing and Economic Development Corporation (WHEDco) on the Draft Scope of Work for the Jerome Environmental Impact Statement (EIS), CEQR No. 17DCP019X. This document accompanies WHEDco's spoken testimony delivered at the Public Hearing for the aforementioned Draft Jerome EIS Scope on 9/29/2016.

We truly appreciate the opportunity to participate in and provide feedback during this process. Do let us know if you have any questions or requests for clarification. Thank you!

Sincerely,

Kerry A. McLean

Vice President, Community Development, WHEDco
50 E. 168th St., Bronx, NY 10452
T. 718.839.1189 | F. 718.839.1170
kmclean@whedco.org
www.whedco.org

Testimony Wayne Molten
Topic Jerome Avenue Neighborhood Planning Study Environmental Scoping Meeting
Date Thursday, September 29, 2016

Good evening, my name is Wayne Molten and I am a proud member and shop steward of Laborers Local 79. I am also the Vice President of 100 Black Construction Workers, a nonprofit whose mission is to improve the political, educational, social and economic status of African-Americans within the construction industry.

I want to start by thanking the Department of City Planning and Bronx Borough Director Carol J. Samol for allowing me to express the concerns I have with the city's proposed plan to rezone my neighborhood along Jerome Avenue.

I expect the city to listen to us, act on our concerns and create a plan that truly benefits Jerome Avenue's current residents, or as a community, along with my brothers and sisters of labor, we will oppose this rezoning.

There are too many people in my community that have long lived through this period of underinvestment in the Bronx. And I am here today to say we will not be displaced. We will not be silenced.

I have a career today with quality healthcare and retirement security because Local 79 gave me an opportunity to overcome barriers that many people face when they come home and try to re-enter society after time in prison. Because of barriers in housing, employment and education, individuals too often relapse and return to the criminal activity that first put them in prison.

I was one of those vulnerable individuals, but my past did not matter to Local 79. The union recognized that people can move past their indiscretions and they gave me a second chance at life with the career I have. I am now an activist and I want my neighbors to access the same opportunities I received from Local 79 when I returned home.

That is why it is disheartening that this massive plan that will create over 4,000 jobs in the construction industry does not include local hiring requirements or the utilization of New York State certified apprenticeship programs. Who will build the 3,250 new apartments? Who will train and make sure those workers come home after a long day's work? With all these questions still unanswered and 17 worker fatalities this past year alone, it seems the city has not properly analyzed all social impacts of this monumental land change.

Our youth and our community deserve a plan that has their best interests in mind. If done responsibly with community input, the city can actually create a pathway to the middle class for my neighbors through the Jerome Avenue rezoning with local hire requirements and the utilization of New York State approved apprenticeship programs.

This is the kind of plan we want. This is the plan we are advocating for.

We don't need a plan that will aid unscrupulous contractors in continuing to exploit African American, Latino, immigrant and other vulnerable workers, including those coming home from prison.

I urge the city and Department of City Planning to NOT move forward with the certification of this rezoning until *ALL* social impacts have been fully studied or we as a community will say NO to the Jerome Avenue rezoning.

Thank you.

MAS Comments Regarding the Draft Scope of Work for the Jerome Avenue Rezoning and Related Actions, Environmental Impact Statement CEQR No. 17DCP019X, Bronx, NY

October 10, 2016

Background

The New York City Department of City Planning (DCP) is proposing a series of land use actions including zoning map amendments, zoning text amendments, and city map changes, together, the proposed actions, along Jerome Avenue in the Bronx. The proposed actions would rezone an approximately 73-block area primarily along Jerome Avenue and the adjoining eastern and western commercial corridors in Bronx Community Districts 4, 5, and 7. According to the Draft Scope of Work for the Environmental Impact Statement (Draft Scope), the proposed actions are expected to result in a net increase of approximately 3,250 dwelling units, 72,273 square feet (sf) of community facility space, 35,575 sf of commercial/retail space; and a net decrease of 47,795 sf of industrial space and 98,002 sf of automobile-related uses.

MAS requests the following items be included and considered in the Final Scope of Work (FSOW) for the Jerome Avenue Environmental Impact Statement (EIS):

Reasonable Worst-Case Development Scenario (RWCDS)

The Draft Scope describes the criteria for selecting projected and potential development sites.

- Lots utilizing less than half of the permitted Floor Area Ratio (FAR) under the proposed zoning;
- Lots with a total size greater than or equal to 5,000 square feet;
- Underutilized lots (vacant lots, surface parking lots, garages and single story structures built to less than or equal to half of the proposed zoning); and
- Lots located in areas where changes in use would be permitted.

The Draft Scope also describes lots that meet the criteria but were excluded from selected projected and potential development sites.

- Lots where construction activity is actively occurring or has recently been completed;
- Schools (public and private), municipal libraries, government offices, hospitals, medical centers and houses of worship (stand-alone);
- Certain large commercial or community facility uses;
- Lots utilized for public transportation and/or public utilities.
- Lots containing multi-family (6 or more dwelling unit) residential buildings; due to required relocation of tenants in rent-stabilized units;

The City argues that these lots are very unlikely to be redeveloped. However, the rationale of removing lots containing multi-family residential buildings from the expected projected development sites is unclear.

Many multi-family buildings in the study area are underbuilt. There are almost 50 buildings within the rezoning area and more than 300 in the secondary study area (1/4-mile radius) that

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have at least 2.5 FAR available for development (an average of 37,000 sf of available development rights for each building). We believe the upzoning would increase incentives for redeveloping these properties and potentially lead to the direct displacement of residents. Furthermore, there are 30 under-built properties (having 2.5 available FAR or more) in the rezoning area that are likely to have rent stabilized residential units (information based on MapPluto V16.1 and foil request for registered properties with the New York State Division of Housing and Community Renewal DHCR). There may be thousands of rent stabilized units in the rezoning area that may be targeted for redevelopment and deregulated after the rezoning (the exact number is uncertain as registering dwelling units with the DHCR is voluntary).

Regardless of the potential direct residential displacement and loss of rent stabilized units, the RWCDs does not include these properties as part of the criteria for selecting projected and potential development sites. As such, MAS recommends that the FSOW include these properties as part of the criteria. MAS also encourages the City to further investigate the stock of rent stabilized units to accurately project potential residential displacement.

Projections based on the RWCDs dictate whether specific thresholds identified in the City Environmental Quality Review (CEQR) Technical Manual would be exceeded and a detailed analysis be required. To reflect the addition of the aforementioned sites in the RWCDs, MAS expects a more robust assessment of the following CEQR environmental categories.

Zoning, Land Use, Public Policy

The land use analysis should reflect the expanded criteria for selecting projected and potential development sites described to include properties containing multi-family residential buildings (6 or more dwelling units) and buildings likely to contain rent stabilized units. Both typologies should be included in the primary and secondary study areas (rezoning and neighboring areas within ¼ mile).

The EIS should identify and evaluate a wide range of Mandatory Inclusionary Housing (MIH) options to ensure to the extent practicable that all feasible measures have been explored that represent the socioeconomics of the project area.

Socioeconomic Conditions

The Draft Scope describes four issues of concern with respect to socioeconomic conditions that warrant assessment: (i) direct business and institutional displacement, (ii) indirect residential displacement, (iii) indirect business and institutional displacement, and (iv) adverse effects on specific industries. However, the Draft Scope omits assessing a primary issue of concern: direct residential displacement. The City argues that the Proposed Actions would not exceed the threshold of 500 displaced residents and, therefore, are not expected to result in significant adverse impacts due to direct residential displacement. However, the RWCDs is likely to be underestimating residential displacement as it fails to account for potential direct displacement from under-built multifamily buildings and secondary displacement from rent stabilized units that may be deregulated. MAS finds that including these properties in the selection criteria for development sites, as described previously, is likely to result in more than 500 directly displaced residents.

The Socioeconomics analysis should provide details on how the project would support auto-related business, especially in light of the anticipated elimination of almost 100,000 square feet of existing car-related business.

Community Facilities

The proposed actions impacts substantially exceed CEQR thresholds for determining significant impacts on elementary, middle, and high schools, libraries, and child-care facilities. Given the 9,520 new residents anticipated under the proposed actions, we expect a rigorous evaluation of the proposed action's impacts on the capacity of existing schools, child-care facilities, and libraries in the project area. The analysis should include the identification of mitigation measures such as the proposal of new community facilities in the project area to accommodate the added demand.

Open Space

The additional residents (9,520) and workers (1,016) anticipated under the proposed actions would place a demand on the limited existing open space resources in the project area. According to the CEQR Technical Manual, the Fordham neighborhood of the project area is currently underserved by open space. We understand that the proposed actions include creating a 0.50-acre park through the demapping of Corporal Fischer Place. However, in light of this change, the project area will remain underserved. MAS feels the project should include additional open space in the project area and examine utilizing the redevelopment of vacant sites or underutilized sites to create open space opportunities.

Shadows

The proposed actions would permit development of buildings greater than 50 feet in height and therefore has the potential to result in shadow impacts in the areas to be rezoned. The EIS will assess the RWCDS on a site-specific basis for potential shadowing effects of new developments at both the projected and potential development sites. However, underbuilt multifamily buildings should be included in the criteria for selecting projected and potential sites and be reflected in the detailed shadows assessment.

We also expect the EIS will include an evaluation of potential shadow impacts on the Morris Avenue Historic District, which is within the project area, and the Grand Concourse Historic District, which is within the 400-foot study area.

Historic and Cultural Resources

As mentioned in our comments on Shadows, the EIS should include an evaluation of potential shadow impacts on the two historic resources in the project area: the Morris Avenue Historic District and the Grand Concourse Historic District.

Urban Design and Visual Resources

The proposed project would significantly affect the public realm within the project area. MAS recommends that design guidelines are put in place for redevelopment under the Jerome Avenue Special District that includes streetscape improvements, open space improvements, and building design.

Transportation

Based on community input, traffic congestion has been identified as a major problem within the project area. The additional residents and workers anticipated under the proposed actions will only worsen conditions. The proposal should include recommendations from the Jerome Avenue Transportation Study, especially with regard to proposed improvements to reduce vehicular congestion and improve pedestrian and bicycle access.

The EIS needs to address increasing and improving transit service on the 4, B and D lines and all bus routes that service the project area.

Hazardous Materials

We expect the EIS will include the findings and recommendations from anticipated Phase I Environmental Site Assessments (ESA), Phase II Environmental Site Investigations (ESI) on development sites in the project area and the reports will be made publicly available.

We expect that E-designations for hazardous materials will be placed on sites designated for residential rezoning under the proposed actions.

Air Quality and Noise

We expect E-designations for Air Quality and Noise will be placed on sites to be rezoned for residential use.

Water and Sewer Infrastructure

According to the Draft Scope, the projected water demand under the proposed actions would be 967,002 gallons per day, which is just below the CEQR Technical Manual threshold of one million gallons per day. Based on the magnitude of the project, we expect the EIS to include a quantitative evaluation of the impacts on the City's water supply and infrastructure.

Solid Waste and Sanitation Services

The proposed actions will result in development that would generate solid waste at a rate that is double the CEQR threshold for potential significant impacts. We expect a detailed solid waste evaluation and identification of measures designed to reduce the generation of solid waste in the project area.

Energy

We expect the energy evaluation to go beyond merely disclosing the projected energy demand of the proposed project. The evaluation needs to include a detailed evaluation of the operational energy efficiency of new construction under the proposal.

Greenhouse Gas Emissions and Climate Change

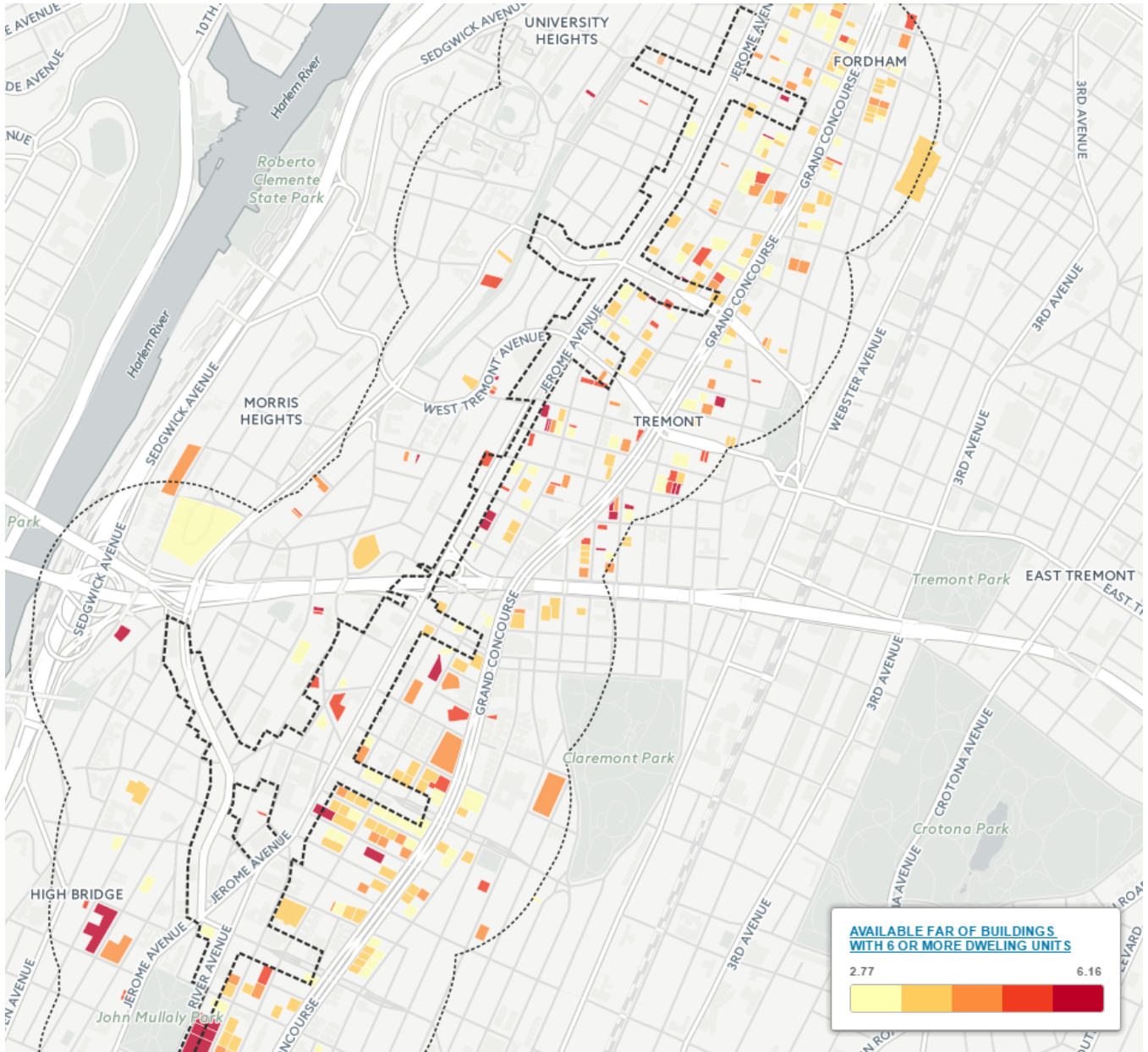
Based on the magnitude of the development anticipated under the proposed actions, the EIS must provide a detailed analysis of the specific sustainable measures that will be employed to reduce GHG emissions. These include, but are not limited to, design guidelines that promote sustainable demolition and construction methods, green roofs, tree planting, new open space, and state-of-the-art energy efficient HVAC equipment.

Construction Impacts

Given the scale of the project and the potential for multiple sites to be under construction at the same time, the construction analysis needs to include detailed evaluation of construction traffic, air quality, and noise, especially with regard to impacts on residential areas, schools, and medical facilities.

Thank you for the opportunity to provide comments on this critically important proposal.

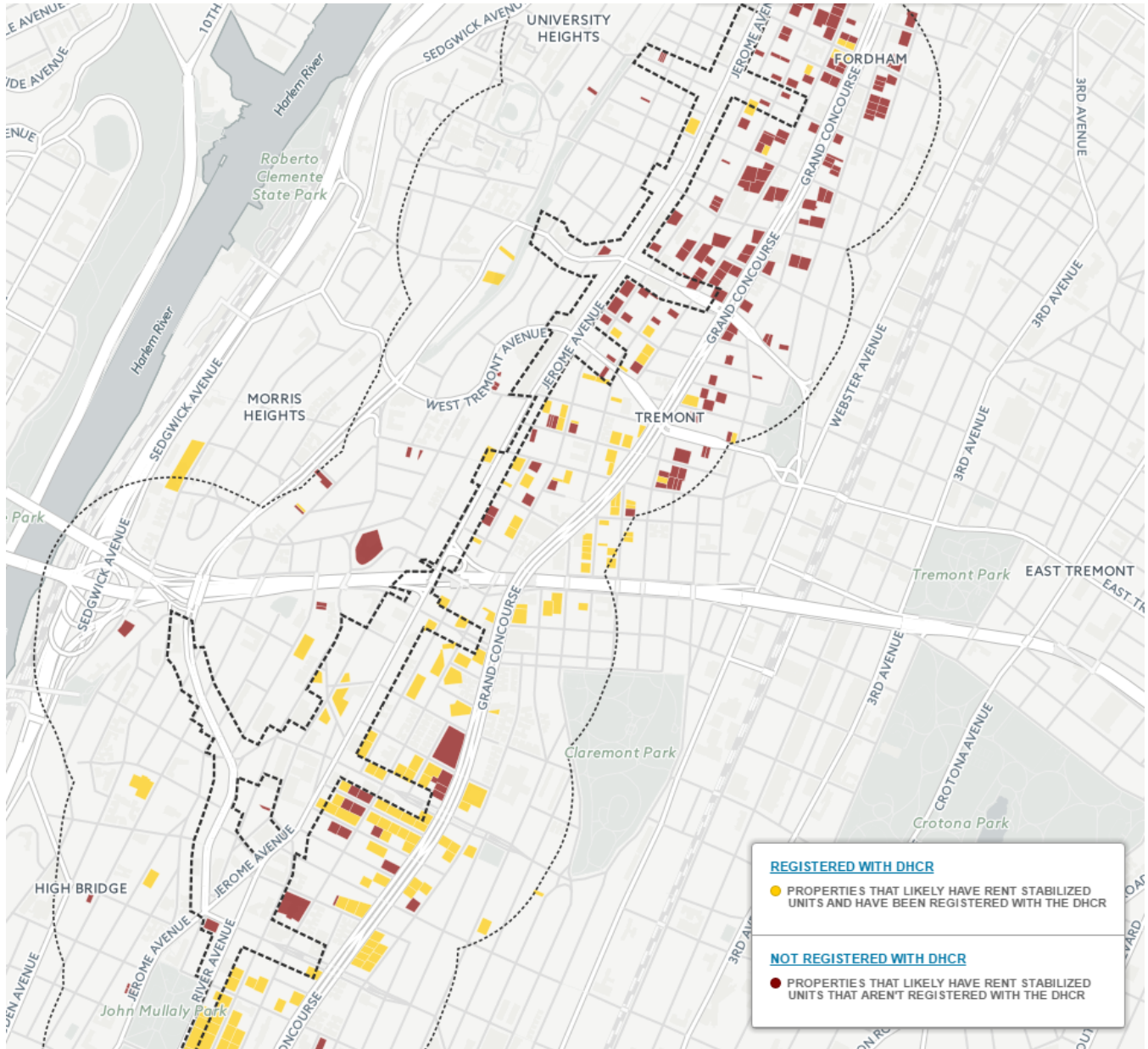
Underbuilt Multifamily: Properties with six or more dwelling units and have more than 2.5 available FAR



[Map by MAS NYC](#)

Data source MapPluto 16v1

Properties that are likely to have rent stabilized units and have more than 2.5 available FAR



[Map by MAS NYC](#)

Data source MapPluto 16v1 and DHCR
Foil request by Chris Henrick for addresses with rent stabilized units from years 2002, 2005, 2009, 2011, 2012 and 2013

Jerome Avenue Rezoning - Public Hearing September 29, 2016

Goals and Priorities Bronx Community Board 5

- I. Introduction - The Jerome Avenue Rezoning encompasses a 73-block area focused primarily along the Jerome Avenue corridor. The study area is generally bounded by E.184th Street to the North, E. 165th Street to the South, includes portions of Edward L. Grant Highway, East 170th Street, Mount Eden Avenue, Tremont Avenue, Burnside Avenue and East 183rd Street. Should be rezoned entirely.**

- II. Infrastructures - There are Infrastructures and other entities that will be needed to accomplish this process can be discussed under the following categories.**
 - **1. Increase Density**
 - **II. Economic Development (a). Business Improvement Districts (b). Auto-Industry Recommendations**
 - **III. Housing (a). Anti-Displacement & Harassment (b). Preservation (c). New Construction (d). Home Ownership**
 - **IV. Schools/Education**
 - **V. Transportation Infrastructure/Connectivity**
 - **VI. Parks & Recreation**
 - **VII. Public Safety**
 - **VIII. Health & Wellness**
 - **IX. Implementation**

The collective crave to engender the much needed advancement for our community in the areas of business service and economic development has necessitated the pursuit of a number of initiatives meant to lash in on existing and emerging business, economic and developmental opportunities, particularly at the City level as being envisioned by the Mayor de Blassio administration Jerome Avenue Rezoning.

No doubt, overall economic development of the entire neighborhood has remained the focal point of our communal strives in decades past and such is still being pursued with all vigor across board today. This can be corroborated by the reports prepared by INSIGHT ASSOCIATES in September 2003 which was titled A COMMUNITY ACTION PLAN (aka 197-a plan) for Bronx Community Board Five.

It is against this backdrop therefore, that we have embraced and followed through the initial and intermediate stages of the City's Re-zoning program which is one of the a top priority areas of the City's economic and housing development agenda for our community. This is with a view to engendering economic growth and development as well infrastructural and social well-being of our community.

Consequently, we have initiated some structured processes geared towards effective community engagement and full embrace of the City's Re-Zoning program in the ultimate interest of our people and the larger community.

Such initiatives include:

ECONOMIC DEVELOPMENT

1. Constitution of Burnside Avenue.
Commercial District Steering
Committee
2. Formation of a Business Development
District (BID).

The BID is a mechanism to improve conditions in our neighborhoods just as it brings a sense of pride and ownership to local merchants and residents.

It is on record that Business Improvement Districts have delivered a wide range of services in 64 different neighborhoods of New York City and working together as a BID, we are of the strong conviction that we can make the kinds of improvements that will characterize Burnside Avenue as a dynamic neighborhood committed to positive change.

3. Business Needs Assessment Survey:

A structured process that solicited a wide range of information from merchants, property owners and local residents on their areas of need and expectations from the Re-zoning/Commercial Revitalization program.

4. Unveiling of Street Banners.

5. Publication of News Letter/Media Hype:

In addition to series of engagements at the local level, dedicated newsletters in both English and Spanish languages were produced and distributed among merchants, property owners and locals on the inherent benefits of the Re-zoning program viz-a-viz what their expectations are and what areas they will love to see higher level of intervention in the interest of all.

Media exposure in the form of Press Releases and new coverages has also been given due attention with neighborhood media outfits being regularly enlisted in the propagation of the inherent benefits of the entire process.

6. Engagement of Burnside Avenue Merchants Association on The Strip's Commercialization & Revitalization Program:

On regular basis, the merchants are being engaged at both the leadership and general membership levels to further brief them on the core value, essence and inherent benefits of the government's program while still enlisting their inputs in areas quite strategic to them, their businesses and in the overall interest of the community.

AUTO INDUSTRY RECOMMENDATIONS

The rezoning request is to rezone the entire zone without leaving any area.

**Engagement of Political Leadership
in the Area of Job Training & Placement Assistance for Local Residents:**

The Community is intensifying its advocacy efforts with relevant political leaders and institutions in reversing the trend of unemployment and under-employment prevalent in the area with a well thought - out package in aid of the people's socio-economic status bearing in mind, the business and economic potential of the Re-zoning program meant to renew the neighborhood structurally and economically.

A number of initiatives have been put forward to the political leadership in this respect and such include but not limited to;

*** Creation of a Local Employment Network for the purpose of connecting locals to available job opportunities.**

*** Appropriate funding of community based organizations to enable them develop a network similar to the Lower East Employment Network for the purpose of engaging developers in the neighborhood, providing sector-specific trainings for local residents, screening candidates for available positions in emerging projects as well as make referrals where necessary.**

*** Increased funding for Bronx Community College (BCC) and Monroe College which are located within Community Board 5. This is in view of the fact that these institutions are quite strategic to the provision of quality education, adequate skills training and certification programs for the less advantaged members of the community in a bid to help shore up their socio-economic base and the community is desirous of forging a stronger level of partnership with these institutions to continuously provide appropriate trainings and certifications for the locals in aid of their job placement craves.**

This will ultimately help lower unemployment rate, improve families' livelihoods and help shore up locals' economic base.

***The Human Resource Administration (HRA) is also being encouraged to partner with these colleges in the provision of skill training and certification programs for the locals to further assist in creating job opportunities for our residents, particularly those on public assistance.**

Board Five request that the city create a comprehensive strategy of programs and incentives to support the workers and the business owners:

Short-Term

- **Enable businesses to be better neighbors by offering comprehensive services related to compliance and auto-industry standards.**
- **In conjunction with NYPD and CDOT conduct workshops and seminars and create literature related to parking, loading and street rules.**
- **Provide free legal services to business owners to negotiate lease terms.**
- **Provide free ESL classes at times that are convenient for workers and business owners.**

Long-Term

- **Develop a relocation fund which would include a package of incentives that will allow qualifying businesses to relocate to an area within the city that better fits the needs to these businesses**
- **Businesses must be in compliance with all rules and regulations related to the operation of their business and licenses must be up to date.**
- **SBS and EDC should work with qualifying businesses to develop a business plan based on the market and industry trends.**
- **Offer job training, skills development and job placement services to facilitate professional growth for workers and business owners. 73 percent of those surveyed indicated the auto technology training would be most helpful.**
- **Training should be offered for those who want to remain in the auto-industry and a program should be developed for those interested in other trades and skills training (construction, healthcare, HVAC/refrigeration)**

Partnerships should be created with Bronx Community College, Hostos and others that offer similar certificates and training programs. The Local Employment Network should be utilized as a vehicle to facilitate this initiative

HOUSING

It should be noted that while the median income is \$24,489 in CD5 a large segment of the population is rent-burdened and challenged in other areas economically. This is not to say that there is not a need for affordable housing at lower income tiers, but rather there is an opportunity to empower residents with the financial and educational tools to become financially independent.

In order to increase the median income we need area residents be earning more. As existing residents earn more we want to ensure that we are creating opportunities for upward mobility as it relates to housing.

Currently, most of the new development does not offer options for people such as recent college graduates or a two parent household who has worked themselves through college or trade school and can afford better and larger living accommodations. If we do not create more opportunities for higher income earners we will continue to discuss high unemployment and a median income that lags behind the Bronx and represents half the median income citywide

Anti-Displacement & Harassment

- Tenant harassment can take a number of forms.
- The following are a list of recommended interventions and policies related to Anti-Displacement, AntiHarassment and Preservation: Anti-Displacement & Anti-Harassment
 - • Publicly grade landlords and publicly display such grades in their building lobbies.
 - • Create citywide "Certificate of No Harassment" requirements, preventing landlords who have a history of tenant harassment from obtaining certain permits from the Department of Buildings.

- **HPD should create a "Zero Tolerance" policy for harassment and poor building conditions which invariably enables the City to take legal action(s) against property owners.**
- **• Strengthen and improve its various building inspection systems which require building inspectors respond to calls within 24 hours.**
- **• Pass legislations to allow the City take ownership of buildings as a result of landlord harassment, failure to pay code violations and the criminal use of property.**
- **• Increase its oversight duties of landlords and monitor housing court cases, particularly in high risk displacement areas and refer same to community organizations and/or legal aid/legal services that will do additional outreach to help determine if the case is part of a larger harassment pattern.**
- **• Facilitate a process that will ensure developers contribute resources to prevent displacement of current residents. By this, they are required to pay into an anti- where developers are building and the funding would be dedicated to community anti- displacement initiatives.**
- **• Make key neighborhood data available for public review through the creation of a comprehensive list of evictions; tracking of housing related 311 calls and the creation of a comprehensive list of distressed buildings by neighborhoods with all public information such as building ownership, management and most recent sale date**
- **• Create a displacement fund for community organizing initiatives in the most vulnerable areas in these neighborhood**
- **• Provide a \$100,000 funding for a community consulting housing contract to assist tenants, homeowners and property owners.**

Preservation

- **• We recommend the reinstatement of the Advantage Program and funding to the Homeless Eviction Prevention Program to ensure that residents secure permanent housing and decrease the number of transient individuals and families in our districts.**

- • HPD should be proactive in creating a comprehensive strategy to target buildings for their preservation programs.
- • HPD should increase its funding for code enforcement inspectors and provide incentives to property owners to repair and retrofit their buildings in accordance with the building codes like 8A loan and Participation loan programs.
- • The city should reinstate the Neighborhood Preservation Office to deal with code enforcement, antiharassment and displacement. This would provide a team of individuals geographically-based to deal immediately and directly with these issues. This office could also focus on improving conditions on NYCHA campuses.
- • Increase funding for the Proactive Initiative (50 buildings are currently part of the Proactive Initiative more buildings should be added).
- • Enact a set of policies that create incentives that prevent speculation and displacement as well as promote affordable housing development.
- • Support outreach and "Know Your Rights" education by community groups for the good of local residents as a way of improving communication with tenants about their rights.

New Construction

- • New construction that targets a range of income levels with a concentrated focus at 80% AMI and above
 - (1). Mix and Match (2). M2
- • Commitment to local hiring for union and non-union jobs for residents of CB5
 1. Secondary focus on residents of the Borough of the Bronx
 2. MWBE-Commitment to hire minority and women owned businesses
- • Reports from HPD/HDC on as of right projects that receive city subsidy o
 1. Report should be furnished quarterly
 2. Should include unit and income breakdown
 3. Level of subsidy

4. Construction schedule
5. Inclusion of other program elements (commercial, community facility space)

➤ • **Ground Floor Uses**

1. The majority of development is anticipated to be mixed-use with active ground floor spaces.
2. Community should play role in tenanting those spaces
3. HPD should work with SBS, local merchants associations and BIDs to source candidates for these new spaces
4. Rent should be negotiated offered below market with a guaranteed rate over a 5-10 year lease period
5. SBS should provide training and resources in advance for prospective tenants

Home Ownership

- *Home ownership opportunities should be targeted along the Grand Concourse, Concourse Village West area, Yankee Stadium area, University Avenue and West Tremont Avenue.*
- *Small home owners should receive a credit for property damage related to water and sewer damage related to new construction.*
- *Existing homeowners should also be the beneficiaries of the neighborhood plan and should receive enhancement credits when new construction occurs within a quarter mile of their residence.*

SCHOOLS AND EDUCATION

- • **Construction of a high school within the Bronx Community College Campus.**
- • **To increase English and math proficiency partnerships with Bronx High School of Science, Lehman College, Hostos College, Fordham University and Albert Einstein College of Medicine should be forged to create new innovate**

programs to educate our children and prepare them to compete in today's workforce.

- • No fewer than 1,500 additional seats should be provided for high schools in the District with 400 specifically provided for the high school located within Bronx Community College and to aid effective teaching and learning.
- • There should be a substantial increase in the allotment of Universal Pre-K and Day Care slots up to 1,000 to support the projected increase in families and children.
- Parents within the District would require safe places like Child Care and After-School Care Centers and programs for their kids.
- Universal Pre-K should be allocated on fifty percent of all new development

TRANSPORTATION INFRASTRUCTURE/CONNECTIVITY

- Transportation Infrastructure/Connectivity Access and mobility throughout the area is key.
- Currently there are 11 subway stops and ten bus lines running through these areas.
- Improvements to existing transportation infrastructure, amenities and the resurfacing and enhancement of our most vital north-south corridor - the Grand Concourse is a top priority.
- Currently there is no elevator along the #4 line from 167th Street to East 183rd Street or the B/D from 167 Street to Fordham Road. Burnside Avenue would be the ideal location

PARKS & RECREATION

- Community District 5 is considered underserved in terms of open space.
- CD5 has a lack of open space and as a densely populated and built up area the opportunities to create new open spaces are limited.
- • Expedite the development of a proposed park site on 1805, Davidson Avenue;

- • Develop segments of the Aqueduct trail along University and Tremont Avenues.
- • The development of Devanney Triangle, Mount Hope Gardens and West 184th Street, Grand Avenue Play Ground Park.
- • Comfort stations at various park locations (such as Morton and Galileo Playgrounds)

PUBLIC SAFETY

- • Efforts should be dedicated to strengthening the capacity of the police force. Community District Five still has some of the highest crime rates citywide.
- Our long term objective is to expedite the process of acquiring and constructing a new 46th Precinct with parking facilities. This will definitely improve police department services.
- Our short term objective is to expedite funding for the construction of a new front entrance ramp to make the existing 46th Police Precinct ADA accessible.
- •The local Police Precinct should increase funding for the Operation Clean Hallways Program to stop indoor drug dealing and loitering as this has been a quality of life and public safety issue for our community.
- •Funding should be increased for 911 emergency dispatchers to improve response time.
- •Funding should be increased for Narcotics' Enforcement and School Crossing Guards.

HEALTH & WELLNESS

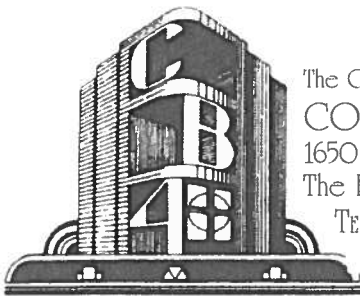
- Bronx Community Board 5 has the 4th highest number of asthma hospitalization in the City

- Bronx Community Board 5 has a number of health providers in the area including the Morris Heights Health Center and Montefiore Hospital.
- ● Improving living conditions that contribute to asthma (mice, roaches and secondhand smoke) should be incorporated into tenant protection and preservation strategies.
 - *More funding for health programs and services particularly those targeted at youth and low-income families as well as increased funding from The Department of Health and Mental Hygiene to address the Districts' main health issues.*
 - *Improving living conditions that contribute to asthma (mice, roaches and secondhand smoke) should be incorporated into tenant protection and preservation strategies.*
 - *Increased funding for the expansion of the Pest Control Unit for additional personnel and field inspectors Exterminators increased funding for teen pregnancy and obesity programs in our District as well as increased funding for additional programming for fitness and exercise in district parks and recreation centers among others.*

IMPLEMENTATION

Submitted By

Dr Bola Omotosho – Bronx Community Board 5- Chairperson



The City of New York
COMMUNITY BOARD 4
1650 Selwyn Avenue, Suite 11A
The Bronx, New York 10457
TEL: 718-299-0800 FAX: 718-294-7870
Email: bx04@cb.nyc.gov

HONORABLE RUBEN DIAZ, JR.
Bronx Borough President

Ms. KATHLEEN SAUNDERS
Board Chair

MR. PAUL A. PHILPS
District Manager

September 29, 2016

Mr. Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
New York City Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

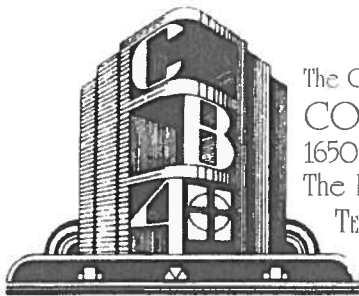
Mr. Dobruskin,

My name is Paul Philps and I am the District Manager of Bronx Community Board Four. I am here today to submit comments in response to the Draft Scope of Work (DSOW) for the Jerome Avenue Study released by the Department of City Planning, on August 29, 2016.

In principle Community Board Four supports the proposed rezoning and related actions. The Board has advocated for a comprehensive study of the Jerome Avenue corridor for several years to facilitate the remediation and redevelopment of brownfield sites to unlock the potential for mixed use, mixed income development. That being said, we have some concerns related to the DSOW, specifically with respect to the schools analysis, existing capacity and the impact the rezoning and future development will have on our district and our children. The DSOW indicates that the proposal has the potential to add 3,250 new residential units to the area and this would trigger a detailed analysis of elementary, intermediate and high schools encompassing Community School District (CSD) 9, Sub-districts 1,2 and 3 and CSD 10, Sub-district 4; with the analysis for each sub district conducted separately.

According to a 2015 report by the NYU Furman Center, Community District Four ranked 54 out of 59 community districts in English, language arts proficiency and 58 out of 59 in math proficiency. Currently the percentage of residents with less than a 9th grade education and from 9th grade to 12th grade is nearly double that of NYC. Furthermore, the district lags behind the Bronx and NYC in terms of percentage of residents with Bachelors and Graduate degrees. It is therefore imperative that the Department of Education and the School Construction Authority address the educational needs of our children.

Educational attainment plays an important role in an individual's employment profile and their ability for career advancement. The quality of education in the Borough and the district warrants a different lens and separate analysis that is outside the purview of this process. However, the physical condition



The City of New York
COMMUNITY BOARD 4
1650 Selwyn Avenue, Suite 11A
The Bronx, New York 10457
Tel: 718-299-0800 Fax: 718-294-7870
Email: bx04@cb.nyc.gov

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MR. PAUL A. PHILPS
District Manager

and location of educational facilities, while not a holistic solution is an important component of that formula. It can address issues of overcrowding and infuse state of the art facilities which in turn can have a positive impact on how our children learn and develop.

The SCA, Enrollment, Capacity and Utilization Report 2014 – 2015 indicates that Elementary Schools in CSD 9 are operating above capacity and that PS/IS and IS/HS are operating at 95 and 97 percent capacity respectively; Elementary Schools and PS/IS in CSD 10 are operating above capacity and High Schools and IS/HS are operating at 94 and 95 percent capacity respectively. The 2014-2019 SCA Capital Plan identifies 572 unfunded seats in CSD 9 (Highbridge South). Given the fact that the city has identified 572 unfunded seats prior to the study, Community Board Four request the City commit to funding and siting for those seats and any additional deficit of seats identified as part of the environmental impact statement. There are a number of city-owned properties within the community district. In addition, the property owners of Block 2855, currently located in the “preserved” M1-2 zoning district propose a school as part of their redevelopment proposal and have indicated they would be open to the possibility of a public school located at the lower floors of their mixed-use development. The New Settlement Campus located north of their site is a prime example of a state of the art educational facility along the elevated rail line.

On behalf of Community Board Four I thank you for your time and consideration.

Sincerely,

Paul A. Philps
District Manager
Community Board 4

Testimony for the Rezoning Hearing:

Hello, my name is Arlene Powell and I'm a parent leader at the Parent Action Committee, PAC located at Townsend Ave. I live at 152 East 171 Street. I live in the area since 2001 till the present.

I live with my two children and ~~my brother~~. I am a single parent. As a parent my concerns about this rezoning is with the schools, jobs, and affordable housing, especially with schools. In my district which is district 9, our schools are overcrowded, 1/3 of new teachers leave within five years. Latino and black children make up 96% of the population & 16% require special education services.

The plan for this rezoning is to bring more than 11,000 new residents, including many school aged children. My concerns are how is the district going to accommodate all these new children?

The city and this district is already struggling to find special education teachers and bilingual teachers. Our district public schools have very low academic performance. District schools currently need more support and funding for our children. The teaching pool in District 9 is less qualified than the city as a whole. Our schools are already over-crowded and underfunded.

What plan is set for the school districts that are in the rezoning area? How will these issues be addressed? How are the already struggling schools going to be of service to the school aged children that are coming into our community?

I think this should put in consideration as well as the importance of our children's education, because the children are the future of this community.

Thank you for listening

Rev. Dr. Raymond Rivera
Testimony Thursday, 9/29/16

RE:

Jerome Avenue Rezoning

Draft Scope of Work for an Environmental Impact Statement

CEQR No. 17DCP019X

My name is Rev. Dr. Raymond Rivera. I am the President of the Latino Pastoral Action Center, a network of churches and ministries, in the Jerome Avenue re-zoning area. I am also an advisor to the United Auto Merchants Association (U.A.M.A.), which we provide technical assistance and capacity building training. For five (5) years we also incubated their organization at our site, located at 14 West 170th Street, Bronx, N.Y. 10452.

I am here to affirm the general direction of Mayor Bill De Blasio's' Housing Initiative in the Jerome Avenue Corridor. I believe that new housing units that are being proposed are greatly needed in our communities.

I have differences with the mayor's plan as it relates to the number of housing units that have being allocated for low-income families in the corridor. The present figures are still too high for the residents that are currently living in our neighborhoods.

In this draft, I believe that there should be more flexibility and more room for creative thinking as to how we can meet the needs of low-income residents, so that the result will not lead to future displacement. This is not a "new story". We have seen it play out in different communities throughout the city. This is our opportunity to get it right.

This draft seems to be too dogmatic. There doesn't seem to be ample room for adjustments and edits to the draft. To me everything feels like it is written in stone. I hope this is only my subjective understanding and that I am mistaken, and that this hearing will greatly impact this draft statement.

Pertaining to the matters of the automotive businesses in the corridor, we do not want a repetition of the "Willis Point" fiasco where local businesses and thousands of jobs and families were negatively affected; where insensitivity and "false promises" ruled the day.

In your current plan, there is only a small amount of space allocated for these businesses and even that space is not guaranteed to them. This falls significantly short of what is needed for this small business community.

In this regard, I fully support the U.A.M.A.'s plan, which you will hear more about from their President, Mr. Pedro Estevez later on during this hearing proceeding. He will be more specific and flesh it out for you but summarizing the plan, it consists of four (4) points which are:

1. Compliance
2. Technical Trainings
3. Relocation
4. Business Development

I thank you for granting me the opportunity to speak to this proposed draft plan.

The Property Owners @ Jerome/Inwood Avenues & West 169th Street

Good Evening. My name is Gary Spindler, and I am testifying on behalf of myself and the other property owners on the block of Jerome and Inwood Avenues at West 169th Street. Our properties are currently zoned M1-2 for heavy commercial uses like automotive services. We own and/or operate legacy businesses, which struggle to be profitable, and are stuck in time.

As the owner of a two-story, 20,000 sf parking garage at 1295 Jerome Avenue and as the tenant of the adjacent 15,000 sq ft parking garage a two-story, 15,000 sf property at 1275 Jerome Avenue, I understand that change takes time and that existing businesses will be “grand-fathered” after a re-zoning is permitted. As of now besides operating a parking garage we have several operating businesses at tenants. A graphics design printer, a Juice Bar, a construction contractor, and two automotive related shops repairing glass windows and automotive mechanics. The repair shops face tremendous competition from local shops above West 170th Street that are closer to the Cross-Bronx Expressway. They struggle every month to keep operating and are in danger of defaulting on their lease obligations. My alternatives are limited under the current M1-2 zoning. As responsible ownership, we would like to plan for a future where we can grow our properties vertically, allowing us to contemplate additional uses like housing, community services, schools and retail which will lead to economic growth.

As the zoning now stands, we have maxed-out our properties. We cannot improve the condition of our streetscapes due to the numerous curb cuts that are essential for automotive-related businesses. Our tenant’s repair shops spill out onto the sidewalk and into the streets. Customers routinely double and triple-park their cars on Jerome Avenue despite our wishes. These tenants have no incentive to improve the landscaping, to illuminate the streetscape or to engage in more sustainable practices as the increasingly high-tech world of automobile design passes them by.

Throughout 2016, we have spoken with Bronx Community Board Four, Council Member Gibson’s office and the Bronx Borough President’s Office about our stagnant properties and about our wish to become a better neighbor, contributing to a robust local economy through re-zoning.

I would like to ask that the Department of City Planning during this Draft Environmental Impact Scoping session, support our request for a rezoning of our M1-2 block for potential mixed-use residential and retail developments, creating jobs and foot traffic that doesn’t exist now. Next, our consultant, Mr. Sandy Hornick, will speak about his findings regarding the state of Bronx Auto Repair Shops and options going forward.

EMAIL:

MICHAEL@PARKITNY.COM

917.622.5154

My name is Dave Subren and I now live in the north Bronx and I am a member of C.A.S.A. (community action for safe apartments)

I am here to deconstruct a false construct called “affordable housing”, it should be called INCOME TARGETING HOUSING! so we know what the income band or true cost of the monthly rent actually is.

The second false construct is the Area Median Income known as the A.M.I. which is rigged from the start against tenants in NYC in that it not only covers the 5 boroughs but also Putnam county which is not in N.Y.C.

So the city calculates the A.M.I. to be at least \$75,000 per year and the government mandates that 30% of your income be considered the threshold of TRULY affordable housing; so that means 30% of \$75,000 will be \$22,500 per year, spread over 12 months (by dividing 12) brings the true monthly rent to \$1875.00 per month which is STILL too high especially for Bronx Community boards 4 and 5 the affected rezoning areas.

So my solution to this is to localize the A.M.I. to the 59 Community Boards’ catchment areas in N.Y.C. especially Bronx Community Boards 4 and 5 which are most affected by the Jerome/Cromwell rezoning plan.

Since the A.M.I. for Bronx community boards 4 and 5 is about \$25,900 then 30% of that would be \$7770.00 per year, spread over 12 months brings the TRUE monthly rent to \$647.50 per month.; and my above formula and calculation (not the figures—which you can obtain for where you live) can be applied to any community board in N.Y.C. to find your true monthly rent for where you live

So I ask you which rent reflects truly affordable housing?

Now the city will counter by asking where will the money come from if not the developers construction model called 421A and my answer is to check Controller Scott Stringer's website or office for the over 1,100

vacant lots, foreclosures and "zombie properties" that he found which could be put in a community land trust (C.L.T.) and or land bank like Detroit, Baltimore and Vermont , and then apportioned it out to experienced non profits like Banana Kelly in the Bronx, Cooper Square Mutual housing in the L.E.S C.A.T.C.H. in Brooklyn, and HABITAT FOR Humanity nation wide who by the way is planning to build a housing complex that is targeted to low income Bronx residents at 839-843 Tilden Street.

Also, the City can acquire abandon and under used land/buildings through a process known as imminent domain to be redistributed for the public's benefit.

Hopefully that project will provide local hire for unions like local 79 in the Bronx.

Thank you

Respectfully,

Dave Subren.

Ashley Torres Environmental Review Testimony

The Proposed Actions are classified as Type 1, as defined under 6 NYCRR 617.4 and 43 RCNY 6-15, subject to environmental review in accordance with CEQR guidelines. An Environmental Assessment Statement (EAS) was completed on August 26, 2016. A Positive Declaration, issued on August 29, 2016, established that the Proposed Actions may have a significant adverse impact on the environment, thus warranting the preparation of an EIS. The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Actions. The process allows other agencies and the public a voice in framing the scope of the Jerome Avenue Rezoning Draft Scope of Work for an EIS -4- EIS. The scoping document sets forth the analyses and methodologies that will be utilized to prepare the EIS.

Because the Proposed Actions would affect various areas of environmental concern and were found to have the potential for significant adverse impacts in a number of impact categories, pursuant to the EAS and Positive Declaration, an EIS will be prepared for the Proposed Actions that will analyze all technical areas of concern. The EIS will be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA) (Article 8 of the New York State Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617, New York City Executive Order No. 91 of 1977, as amended, and the Rules and Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York.

The City is assessing both the direct and indirect impact of the Jerome Avenue rezoning by conducting an environmental review, which includes the primary and secondary land use study. Each point listed below identifies any potential adverse environmental effects of proposed actions, assesses their significance, and proposes measures to eliminate or reduce significant impacts. The agency leading review responds to comments received as part of the public review process.

Reasonable Worst Case Scenario-Direct and Indirect Secondary Displacement of Residents and Business Because Previous Construction Projects within a 1 Mile Radius of the Primary Study Area was NOT Accounted For in the Secondary Study Area Socioeconomic Conditions

- Expand the 1/4 mile radius from the primary land use study area to a 1 mile radius from the primary land use study area. This will include the new subareas that needs to be analyzed for the secondary land use study. The subareas are necessary in the analysis because the proposed actions could affect portions of the primary and secondary area in different ways.

The socioeconomic study area boundaries are expected to be similar to those of the land use study area, and will be dependent on the size and characteristics of the RWCDs associated with the Proposed Actions. A socioeconomic assessment seeks to assess the potential to change of the socioeconomic character relative to the study area population. **As the proposed actions would affect a two-mile stretch of Jerome Avenue in portions of six communities, it may be appropriate to create subareas for analysis if the actions could affect different portions of the study area in different ways.**

The current secondary land use study area will include the neighboring areas within a **1/4 mile radius** from the primary land use study area. In order to determine the impact of the indirect and direct residential and business displacement, the EIS must determine if the existing residents will be able to afford the neighborhoods market rate units, or if the rezoning will introduce new populations from outside of the neighborhood. **It is appropriate to create subareas for analysis in order to properly assess the displacement in the secondary study area. These neighborhoods includes:**

- Fordham Manor-Kingsbridge
- University Heights
- Morris Heights
- Morrisania
- Highbridge

(When I reference subareas throughout this testimony this includes these 5 neighborhoods: Fordham Manor, University Heights, Morris Heights, Morrisania and Highbridge)

The EIS study must expand the scope to 1 a mile radius from the primary study area. Increasing the secondary study area will include the subareas, listed above, that would be affected by the Jerome Avenue rezoning. The subareas listed above need to be included in the EIS study because they were rezoned for future construction projects by 2026. The construction projects includes two approved rezoning proposals, the Kingsbridge Armory and the Lower Concourse rezoning.

The additional 1 mile radius from the primary study area is bounded by Kingsbridge Road to the North, 149th Street to the South, Harlem River to the West and Webster and Melrose Avenues to the East. This includes the waterfront communities on Sedgwick and Bailey Avenue, Webster Avenue, East and West Fordham Road, Kingsbridge Heights and Fordham Heights.

The distance between the Jerome Avenue rezoning and the Lower Concourse rezoning is 12 blocks. The distance is bounded by the Harlem River to the West, Morris Avenue to the East, Yankee Stadium-161st Street to the North and 149th Street to the South. The Jerome Avenue rezoning is 3 blocks away from Yankee Stadium. The space bounded between the two re-zoning projects needs to be included in the subarea analysis. This area is in the middle of two zoning areas, and is prone to direct and indirect displacement of residents and businesses.

Highbridge, Fordham Manor and University Heights includes Sedgwick Avenue and Bailey Avenue. Sedgwick and Bailey Avenue are close distance to the Harlem River waterfront and residents and businesses may experience indirect and direct residential and business displacement because of the construction in neighboring communities. Particly because of the lower concourse rezoning, which includes the construction of the Harlem River waterfront. The Jerome Avenue rezoning will encourage R9A and R8A rezoning, which will incentivize developers to expand to the areas closest to the waterfront. This area is also not included in the draft EIS.

The potential impact of the new density on Jerome Avenue makes assumptions about population risk of displacement from demolition and indirect displacement caused by increased rent prices. **The EIS study must include:**

- The EIS must analyze areas expected for construction by 2026, this includes the subareas listed above, the 1 mile radius of the primary study area and the rezoning of the Lower Concourse and the Kingsbridge Armory in order to determine the indirect and direct displacement of residents and businesses.
- The EIS study must include the subareas of Fordham Manor, University Heights, Morrisania Heights, Morrisania and Highbridge in their analysis of direct and indirect resident and business displacement.
- The EIS study must include the direct and indirect resident and business displacement that the Jerome Avenue rezoning and the Lower Concourse Rezoning will have on the development of waterfront communities along the Harlem River. This includes the subarea communities of Highbridge, Fordham Manor and University Heights.
- Determine the real estate market conditions in the subareas within the 1 mile radius of the primary study area in order to assess the direct and indirect displacement of businesses and residents.

- A detailed analysis of the 1 mile radius of the primary study area which includes- in-depth demographic analysis and field surveys to characterize existing conditions of residents and housing, identify populations at risk of displacement, assess current and future socioeconomic trends that may affect these populations, and examine the effects of the Proposed Actions on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk.
- The EIS study must include mitigation measures to avoid or reduce potential significant adverse land use, zoning, and/or public policy impacts will be identified within the 1 mile radius of the primary study area.

Reasonable Worst Case Scenario-Indirect and Direct Primary and Secondary Displacement of The Most Vulnerable Residents: Rent Stabilized, Project Based Section 8, Cluster Sites, Supportive Housing and 421-A Dwelling Units, Socioeconomic Condition & Neighborhood Characteristic

- Analyze the indirect and direct displacement of residents in the primary and secondary land use study for rent-stabilized, project based section 8, cluster site, supportive housing and 421-A dwelling units. This includes the subareas within the 1 mile radius of the primary land use study.

Socioeconomic conditions created by a proposed action. Indirect residential displacement could occur if a proposed project either introduces a trend or accelerates a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. To assess this potential impact, the analysis will address a series of threshold questions in terms of whether the project substantially alters the demographic character of an area through population change or introduction of more costly housing. The indirect residential displacement analysis will use the most recent available U.S. Census data, New York City Department of Finance's Real Property Assessment Data (RPAD) database, as well as current real estate market data, to present demographic and residential market trends and conditions for the study area. The presentation of study area characteristics will include population estimates, housing tenure and vacancy status, median value and rent, estimates of the number of housing units not subject to rent protection, and median household income.

Community district 4 and 5's existing housing stock is predominantly rent-regulated. New multifamily development in the vicinity of the study area has consisted predominantly of publicly subsidized affordable housing development. While some unsubsidized construction has been observed in smaller buildings, past and recent development trends have been that the majority of housing developed in the area has been publicly subsidized, and this trend is expected to continue. **Between 2005 and 2015, more than 80% of all new housing units in Community Districts 4 and 5 were subsidized affordable units.**

The EIS study must assess the impact that the new rezoning will have on the current housing stock, in the primary and secondary analysis, which is predominantly rent-regulated. The rezoning can accelerate a trend of changing socioeconomic conditions by eliminating rent regulated units because of new market demands. In addition, the EIS study must incorporate the direct and indirect displacement in the primary and secondary study of cluster site housing and supportive housing. Currently there are many cluster and supportive housing sites throughout community district 4, 5 and 7. Particularly on Tremont Avenue, Burnside and Featherbed Lane, all areas that will be affected by the proposed Jerome Avenue rezoning.

In order to ensure that the number of rent-stabilized dwelling units, and the residents of rent-stabilized dwelling units are safe from harassment and upward pressures of the rental market, the EIS study must assess the impact that the Jerome Avenue, Kingsbridge Army and Lower Concourse rezoning will have on indirect and direct displacement of residents in the primary and secondary study for rent-stabilized, project based section 8, cluster site, supportive housing and 421-A dwelling units. This scope must be within 1 mile radius of the primary land use study. About 80 percent of the housing stock in this area is rent stabilized, and we need to ensure that the residents within these buildings remain by providing free legal representation to all low income residents within the 1 mile radius of the primary study area. This also includes businesses and residents impacted by the Lower Concourse and Kingsbridge Army rezoning.

The EIS study must include:

- The amount of rent-stabilized, project based section 8, cluster sites, supportive housing and 421-A dwelling units in the primary and secondary land use study that will be impacted by direct and indirect residential and business displacement. This includes the subareas of Fordham Manor, University Heights, Morris Heights, Morrisania, Highbridge and the 1 mile radius of the primary land use study.
- Disclose the amount of housing that could be created in partnership with non for profits instead of using mandatory inclusionary housing in the primary and secondary land use study. This includes the subareas and the 1 mile radius of the primary land use study.
- The AMI of residents within the primary and secondary study, and assess the amount of residents that do not have the AMI to qualify for the mandatory inclusionary housing. This includes expanding the EIS analysis to incorporate the 1 mile radius of the primary study and the include the subareas. Bronx County is one of the poorest counties in the country and we must ensure that limited displacement occurs to the most vulnerable.
- Disclose the amount of cluster site and supportive housing that are unprotected dwelling units in the primary and secondary study area. This includes the subareas and the 1 mile radius of the primary land use study.
- Analyze the amount of non-for-profit affordable housing in the primary and secondary study. This includes the subareas and the 1 mile radius of the primary land use study.
- **Analyze the amount of possible non-for-profit affordable housing in the primary and secondary study. This includes the subareas and the 1 mile radius of the primary land use study.**
- There are many cluster sites located on Featherbed Lane. The residents of the cluster sites could experience direct and indirect displacement because of the rezoning. The EIS study must include an analysis of how many residents this affects and how it would increase homelessness. This data must be incorporated in the primary and secondary land use study. This includes the subareas and the 1 mile radius of the primary land use study.
- Provide and disclose the amount of unprotected dwelling units in rezoning areas containing low-income residents. Also include the amount of unprotected dwelling units that will be affected by direct and indirect residential and business displacement. **This includes the subareas and the 1 mile radius of the primary land use study.**
- Determine the net in-migration, if the zoning proposal was adopted. This includes the subareas and the 1 mile radius of the primary land use study.
- Include the direct and indirect impact that the Jerome Avenue, Kingsbridge Army and Lower Concourse rezoning will have on the net in-migration and the previous population of the neighborhood in the primary and secondary study.
- The EIS study must disclose the number of residential units and estimated number of residents to be directly and indirectly displaced by the Proposed Actions, and will determine the amount of displacement relative to study area population. This includes the subareas and the 1 mile radius of the primary land use study.
- Determine whether the primary and secondary study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends and whether the study area potentially contains a population at risk of indirect displacement resulting from rent increases due to changes in the real estate market caused by the new population. This must include the subareas and the 1 mile radius of the primary land use study.

Reasonable Worst Case Scenario-Indirect and Direct Displacement of Small Business Owners on 145th Street, Kingsbridge Road and Fordham Road, Socioeconomic Conditions, Urban Design and Cultural Resources

- Analyze the indirect and direct displacement of small businesses owners in the primary and secondary study. This includes the subareas within the 1 mile radius of the primary land use study.

Small businesses on Kingsbridge Road and Jerome Avenue are currently experiencing pressure from landlords who seek to increase rents in preparation for the Kingsbridge Armory and Jerome Avenue rezoning. The Kingsbridge Armory is also located on Jerome Avenue and Kingsbridge Road. The City of New York has no protections for commercial tenants, leaving them without options as the rent prices soar. Small business then choose to either move or close their businesses.

The 73-block proposal will be a block from Fordham Road and five blocks from Kingsbridge Road these are two bustling commercial strips. These two commercial strips will be affected by the construction slated by 2026. The EIS study needs to expand the scope of the primary study area by 1 mile in order to determine the socioeconomic effects that the Jerome rezoning will have on small businesses on Fordham Road and Kingsbridge Road. **The EIS study, must assess the impact that the zoning will have on small business in the secondary study. This includes the areas of:**

- 281 West Fordham Road to 16 E. Fordham Road
- 16 E. Fordham Road to 406 E. Fordham Road
- 269 W. Kingsbridge Road to 1 E. Kingsbridge Road
- 1 E. Kingsbridge Road to 2605 Webster Avenue
- 100 E. 149th Street to 255 E. 149th Street

The City of New York needs to ensure that small businesses that have been serving the community for years, will continue to do so AFTER the rezoning. **The EIS study must include the subareas listed below in their analysis. The added subareas are:**

- **281 West Fordham Road to 16 E. Fordham Road**
- **16 E. Fordham Road to 406 E. Fordham Road**
- **269 W. Kingsbridge Road to 1 E. Kingsbridge Road**
- **1 E. Kingsbridge Road to 2605 Webster Avenue**
- **100 E. 149th Street to 255 E. 149th Street**

The subareas highlighted above must be included in order to properly assess the direct and indirect secondary displacement of businesses. Each bullet point is presented below:

- Disclose the amount of indirect and direct displaced independent retailers in the primary and secondary study. **This includes the subareas and the 1 mile radius of the primary land use study.**
- The EIS study must crunch the numbers and determine the amount of vacant storefronts on 149th, Fordham Road and Kingsbridge Road. **This includes the subareas and the 1 mile radius of the primary land use study.**
- The EIS study must crunch the numbers on whether the businesses to be displaced provide products or services essential to the local economy that would no longer be available in its "trade area" to local residents or businesses due to the difficulty of either relocating the businesses or establishing new, comparable businesses. This includes the automotive industry on Jerome Avenue.
- The EIS study must also include the impact that the Jerome Avenue, Kingsbridge Armory and Lower Concourse will have in order to determine the net in-migration of new businesses, and the previous population of the small businesses in the primary and secondary study. **This includes the subareas and the 1 mile radius of the primary land use study.**
- The EIS study must include within the primary and secondary study the direct impact that high rent, short term leases and the extortion of immigrant business owners will have on the cultural resources in the preexisting communities on Fordham Road, Kingsbridge Road and Jerome Avenue. **This includes the subareas and the 1 mile radius of the primary land use study.**
- The EIS study must include the affects that the construction displacement will have on residents and businesses in the primary and secondary land use study. This must include the Lower Concourse and Kingsbridge rezoning because they will be undergoing construction by 2026.

If the secondary study demonstrates that a large percentage of businesses may experience displacement, or that the rezoning with hasten the process of displacement, the City must work with SBS, landlords and commercial tenants to combat the issue of small business displacement. This includes: providing legal representation to small business, working with landlords to keep small business in their lease space or securing new space for tenants that have to move because of construction displacement.

Reasonable Worst Case Scenario-An Unaccounted Increase of MTA Ridership of the B/D and BX 12 Bus Transportation

- Expand the secondary land use study to include the B/D Train and the BX 12 Select Bus. Both means of transportation provide express access from Manhattan to the Bronx. This includes the subareas within the 1 mile radius of the primary land use study.

The massive rezoning proposal is 6 blocks away from R8A zoned housing on E. 183rd Street and Morris Avenue, which zoned to be 12-16 stories. This is also three blocks away from the B/D train stop. The B/D train was not included in the EIS secondary study area. The #4 train is at capacity, leaving only the B/D train. The D train is also express on Fordham Road and Kingsbridge Road to Manhattan. This was not included in the primary and secondary land use study. When the #4 train is at capacity, many people use the alternative, the B/D train which is only 30-35 minutes from midtown. **The BX12 is not included in the EIS secondary study. The BX 12 is a select bus with service that crosses from Jerome Avenue and Fordham Road to Broadway Avenue in Manhattan. The BX 12 also connects to the A/1 train.**

The EIS study must include:

- **The secondary land use study must include the impact that the rezoning will have on the B/D train from Kingsbridge Road to 145th Street and the impact it will have on the BX12 Bus. This increase in residents will result in an increase ridership and this will have a secondary indirect impact on transportation congestion.** The EIS study must include an analysis on the impact that the zoning will have on ridership on the B/D train and the BX 12 Select Bus. This includes:
 - Fordham Road
 - Kingsbridge Road
 - 182-183 Street
 - Tremont Avenue
 - 174-175 Street
 - 170th Street
 - 167th Street
 - 161 Street
 - 155th Street
 - 145th Street
- The EIS study must determine volumes and conditions at analyzed subway station elements in the future without the Proposed Actions using approved background growth rates and accounting for any trips expected to be generated by No-Action development on projected development sites or other major projects in the vicinity of the study area.
- The number of available on-street parking spaces identified within a mile radius of the rezoning area this must include the construction parking demand to determine if a significant adverse parking impact would occur. The mile is necessary because of construction in the Kingsbridge Armory and Lower Concourse. The new influx of residents will have a tremendous impact on parking in already dense area.
- The number of available on-street parking spaces identified in the primary and secondary land use study within a mile radius of the

rezoning area. When parking is scarce in an already dense area this will result in residents parking further in order to secure a parking spot. Continuous circulation can result in traffic congestion, particularly during at the end of the work day.

- **The EIS study must include the amount of parking spaced needed in order to accommodate the new influx of residents. Community districts 4 and 5 are highly dense areas and the study needs to assess the direct and indirect impact of new influx of residents would have on parking in the primary and secondary area. In order to properly assess the the EIS study must expand to a 1 mile radius of the primary study area.**
- **The EIS must include the affect that traffic congestion will have on the primary and secondary study because of the lack of parking. The study must expand to a 1 mile radius of the primary study. Particularly because the zoning includes the areas close to two major stadiums and because the community districts are already highly dense. Stalled traffic will attribute to high pollution.**
- **The study must review the impact that the two stadiums will have on parking in the primary and secondary land use study area.**
- **The EIS study must include detailed traffic analysis for the areas within the 1 mile radius. This includes the traffic along. Traffic will be heavily affected during the construction of the**
 - 281 West Fordham Road to 16 E. Fordham Road
 - 16 E. Fordham Road to 406 E. Fordham Road
 - 269 W. Kingsbridge Road to 1 E. Kingsbridge Road
 - 1 E. Kingsbridge Road to 2605 Webster Avenue
 - 100 E. 149th Street to 255 E. 149th Street

Reasonable Worst Case Scenario-Increase of Pollution and Asthma Rates because of an Increase in Transportation and Construction Congestion

Hazardous Materials, Noise and Air Quality

- Expand the secondary land use study to include the pollution levels, air quality, noise and hazardous materials as a result of the Jerome Avenue, Kingsbridge Road and Lower Concourse Rezoning.

The Bronx has some of the highest rates of Asthma in the United States. Rates of death from asthma in the Bronx are about three times higher than the national average. The association between air pollution and asthma remains poorly understood. Since exposure is always to a mix of pollutants it is difficult for epidemiological studies to define causal agents in the mix. Asthma has been linked to a number of pollutants. The most commonly studied are the criteria pollutants which are regulated in the United States by the Clean Air Act. The criteria pollutants are carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), ozone (O₃), particulate matter (PM₁₀ and PM_{2.5}) and lead (Pb). Increasing the zoning and adding more people will result in an increase in transportation and pollution.

The Lower Concourse re-zoning encompasses 30 blocks, and is generally bounded by the Harlem River to the West, E. 149th Street to the North, Morris and Lincoln Avenues to the East, and the Major Deegan Expressway to the South. The space in between the Lower Concourse re-zoning and the Jerome Avenue re-zoning is Yankee Stadium, this is only 12 blocks. **The 12 blocks is bounded by the Harlem River to the West, Morris Avenue to the East, Yankee Stadium-161st Street to the North and 149th Street to the South. The Jerome Avenue re-zoning is 3 blocks away from Yankee Stadium.**

The 12 blocks in between the two **Rezoning**s are River Avenue, Gerard Avenue, Walton Avenue, E. 154rd Street, E. 157th Street have major issues with pollution, in particular after Yankee Games. Stalled cars trying to leave the game causes major traffic and the result are CO₂ emissions entering homes.

It is also in close proximity to the 145th Street Bridge, the Macomb's Dam Bridge and the Major Deegan Expressway. The increase of bus, train and car traffic especially along the Major Deegan Expressway will affect not only the air quality but the water quality along the Harlem River. **The space bounded between the two re-zoning projects needs to be included in the secondary study area. The scope must also be expanded to Kingsbridge Road. If there is a game being held in both the Kingsbridge Armory and Yankee Stadium the EIS study must assess the impact that the increase of pollution and hazardous materials will have on the air quality. Particularly in areas where asthma rates are high.**

The EIS study must also include:

- The EIS study must evaluate the amount of **respiratory** illnesses within the primary study area.
- The study must assess the direct and indirect impact that the Kingsbridge Armory, Lower Concourse and Jerome Avenue rezoning will have on the asthma rates in the study area. **Emissions of air quality pollutants from construction from the Kingsbridge Armory, Jerome Avenue and Lower Concourse will add on-site construction machinery and activity as well as the movement of construction-related vehicles on Jerome Avenue. This will result in an increase of pollution and it must be assessed.**
- The study must assess the 12 blocks that are in between the Lower Concourse and the Jerome Avenue rezoning in order to determine the affects that the increased congestion will have on asthma rates. **The 12 blocks is bounded by the Harlem River to the West, Morris Avenue to the East, Yankee Stadium-161st Street to the North and 149th Street to the South. The Jerome Avenue re-zoning is 3 blocks away from Yankee Stadium.**
- The EIS must assess the fiscal impact that the increased asthma rates will have on the City of New York.
- The EIS must assess the air quality on **12 River Avenue, Gerard Avenue, Walton Avenue, E. 154rd Street and E. 157th Street. The EIS must also include the asthma rates within these 12 blocks.**
- The environmental study must include the average daily on-site construction workers and trucks would be forecasted for each projected development, including the Jerome Avenue, Kingsbridge Armory and Lower Concourse zoning.
- The study must assess the impact that the increase of pollution will have on the neighborhoods closest to the following bridges. All the bridges need to be assessed because games being held in Yankee Stadium and the Kingsbridge Armory will attract tourism from all over New York City and New York State.
- **Alexander Hamilton Bridge to the Edward L. Grant Highway**
- **Bronx Lebanon Hospital Center**
- **Macombs Dam Bridge**
- **145th Street Bridge**
- **3rd Avenue Bridge**
- **RFK Bridge**

From: [Jerome Avenue Study \(DCP\)](#)
To: [Annabelle Meunier \(DCP\)](#); [Evren Ulker-Kacar \(DCP\)](#)
Subject: FW: Jerome Avenue Comments
Date: Thursday, November 03, 2016 1:03:16 PM

From: Adrian Untermyer [mailto:auntermyer@gmail.com]
Sent: Wednesday, November 02, 2016 12:01 PM
To: Jerome Avenue Study (DCP) <JeromeAvenue@planning.nyc.gov>
Subject: Jerome Avenue Comments

Thank you for affording members of the community an opportunity to comment on the Jerome Avenue Rezoning.

As a condition of the rezoning, the community should be granted increased service at six-minute headways on the IND Grand Concourse Subway Line during peak hours and ten-minute headways during off-peak hours to alleviate overcrowding on the parallel IRT 4 Train.

Furthermore, peak-hour express services should be re-instituted on the IRT 4 Train in order to alleviate severe overcrowding that impacts overall service and diminishes quality-of-life.

Finally, SBS Bus Rapid Transit service should be implemented along the Jerome Avenue Corridor in order to provide accommodation for the many elderly and disabled members of the community.

Annual expense funding for these improvements should be permanently allocated based on an assessment on any and all new development in the area of the rezoning.

These improvements are imperative if any rezoning is to be successful, as our transit network is severely overcrowded as it stands. No housing program will bear fruit without functional rapid transit in the area.

Thank you for your time and consideration.

Adrian Untermyer
930 Sheridan Avenue 4L
Bronx, NY 10451
(860) 716-4205

##

Testimony Sherice Valentine
Topic Jerome Avenue Neighborhood Planning Study Environmental Scoping Meeting
Date Thursday, September 29, 2016

Good evening, my name is Sherice Valentine and I am a proud member and shop steward of Laborers Local 79. I want to start by thanking the Department of City Planning and Bronx Borough Director Carol J. Samol for today's public hearing on the Jerome Avenue rezoning.

The Bronx has historically been a forgotten borough with no real investments in our schools, transportation, housing or jobs. I am happy to learn that the borough where I grew up in and where my family still resides, is finally being given the attention that it so badly needs.

However, like many people in my community, I'm concerned that my family and the many other families that have lived here throughout the economic breakdown of the Bronx will not be able to enjoy the benefits the city claims will come with the proposed Jerome Avenue plan.

Will my family and friends be able to afford the new housing? Will my family and neighbors have an opportunity, like me, to work on these new buildings and have a career in the unionized building and construction trades?

With the current rise in construction fatalities across the city, will the workers tasked in building over 3,000 new apartments be protected from unscrupulous developers who seek high profits through cutting corners?

As a community, we are discouraged that none of the social impacts I mentioned have been included in the proposed scope. As a community, we hope the city and the Department of City Planning will listen to us and involve the community more fully in the process.

As a member of Laborers Local 79, I have a career in helping build this city. I have a good wage with benefits, retirement security and I know when I leave my home in the morning I will work under safe conditions with the proper training and tools needed to do my job.

Thanks to my job, I am able to provide a better life for my son. I will be able to put him through college one day and give him the opportunities I would not have been able to if I still worked a low wage job in a corporate office.

I want my family and community to have the same quality of life and benefits I do, and it's all thanks to the union. A career in the unionized building and construction trades is a pathway to the middle class, and it's what our neighborhood desperately needs. We can

create that pathway for so many residents in this rezoning if we work together to make sure there are labor and local hire standards attached to this rezoning.

Together we can build it right, together we can transform this community and uplift my neighbors with better jobs and new housing. But we must work together to achieve these goals!

I urge the city and Department of City Planning to NOT move forward with the certification of this rezoning until *ALL* social impacts have been fully studied or we as a community will say NO to the Jerome Avenue rezoning.

Thank you.

Bronx

Legal
Services NYC

**TESTIMONY BEFORE THE NYC PLANNING COMMISSION ON
THE DRAFT WORK SCOPE FOR THE PROPOSED JEROME
AVENUE REZONING**

September 29, 2016

My name is Nathalia Alejandra Varela, and I am a staff attorney in the housing unit of Bronx Legal Services. Bronx Legal Services is part of Legal Services NYC (LSNYC), the largest civil legal services provider in the country. LSNYC has a rich history of fighting poverty and seeking racial, social and economic justice for low-income New Yorkers. For over 45 years, we have challenged systemic injustice and helped clients meet basic needs for housing, access to high-quality education, health care, family stability, and income and economic security. Our neighborhood-based offices across the five boroughs service over 80,000 New Yorkers every year.

In our Bronx housing unit we witness the long-stay tenancies of our clients ranging upward of 40 years and passed down from generation to generation within their families. We have clients who have built their entire lives, families, and businesses in the Bronx. These clients find comfort and security in the ability to work, play and live within their familiar and welcoming neighborhoods. However, we also witness the endless struggles that low-income community-members face in maintaining and obtaining affordable housing in the Bronx. It is these two points that bring me here today to discuss the critical need for the New York City Planning Commission to thoroughly and comprehensively study the effects this rezoning project will have on residential and commercial displacement of residents of Community Districts 4 and 5 of the Bronx.

We believe that it is essential that the City deeply study all potential displacement, both direct and indirect, of residents and businesses in the neighborhoods along both sides of the Jerome Avenue corridor. If the Commission fails to meticulously study the displacement that will occur as a result of the City's proposed action to rezone Jerome Avenue, it will be turning a blind-eye to the startling and undeniable displacement of the pre-existing residents in similar City rezoning projects that have occurred in the past, like in West Harlem, Sunset Park and Williamsburg.

In terms of indirect displacement, which is the form of displacement we commonly see in our work, on pages 32 and 33 of the Draft Scope the Commission identifies how it will assess "indirect residential displacement" and "indirect business displacement", and in the case of the former, there is no commitment to engage in a study of indirect residential displacement. We believe that the Commission should commit to an in-depth study of both kinds of indirect displacement in its Final Scope and to expand the confines of that assessment to include a study of how previous rezoning has indirectly displaced existing populations in the rezoned areas, and the disparate impact it has had on specific populations.

Additionally, we ask that the City review these areas of study with a lens that directly evaluates race and ethnicity especially in light of the vast displacement of people of color, immigrants and the working-poor communities of neighborhoods that have previously been rezoned, like West Harlem and Williamsburg. The Draft Scope makes it clear that the City is not intending to examine the impact of this rezoning through that lens, as there was not one statistic in the draft that provided the racial and ethnic demographic breakdown of Community Districts 4 and 5, even though this rezoning will undoubtedly have disparate impacts on specific racial and ethnic communities. We believe that this is a critical part of any examination of displacement and must be addressed, whether it relates to direct or indirect displacement of residents or businesses. This need is heightened given that, what is arguably the centerpiece of the City Administration's affordable housing plan, is its plans to rezone low-income neighborhoods, that are overwhelmingly neighborhoods of color, across the city.

The City's Draft Scope proposes that it will provide affordable housing, however, we ask that it study and state for which economic populations the housing will in fact be affordable. The affordability of the new proposed "affordable housing" must be examined in the context of the local area median income of Community Districts 4 and 5, in order to truly assess the extent to

which this housing will benefit and be available to existing community residents and their families.

Further, a study of indirect displacement should assess how the demographics of potential new residents and their income levels will affect the affordability of existing residents' tenancies. This requires that the City gather data about the increase in buyouts offered to tenants who are unaware of their rights under rent regulated housing. It also requires analysis of the growth of landlords' use of legal and illegal tactics to remove existing tenants as a result of rezoned districts. The types of tactics that must be studied include: overcharging and harassing tenants, damaging residential property, failing to make legally mandated repairs, discriminating against tenants with government subsidies as a result of rezoning efforts, escalating evictions (even technically lawful evictions) of tenants in their buildings, and increasing the use of legally permissible mechanisms for raising rents such as Individual Apartment Improvements and Major Capital Improvements.

Other issues that we ask the City to study are the expiration of affordability guarantees in the affected neighborhoods, such as the expiration of restriction periods under regulatory agreements that maintain rent rates affordable for existing tenants. As rent regulated apartments disappear, potentially escalated by this rezoning, where does the existing population go? Will they be able to find another affordable apartment? Will the next landlord accept their government issued voucher without prejudice? These are so often the questions our clients at Bronx Legal Services ask us when they are being threatened with harassment and eviction by their landlord. And we already see that community members who lose their housing are frequently unable to secure new accommodation in the same neighborhood, whether it is because of escalating rents or landlords who discriminate against them now that the neighborhood is becoming attractive to tenants with higher incomes, or both.

Small business displacement should also be studied with the same depth and rigor. The rezoning area is predominantly industrious and commercial, and owned by small business owners, many of whom are immigrants and who employ immigrants. The City should analyze how rezoning will affect these small business owners and employees, both in terms of direct and indirect displacement. We are deeply concerned about the significant tracts of Jerome Avenue from which the auto-industry will effectively be zoned out of existence, if the rezoning proceeds as

indicated in the Draft Scope. This requires a deep study of all of the implications for local residents who are employees of those businesses, for residents who use their services and products, for immigrant business-owners who have invested all that they have in these businesses, and for the community that has been built over many years around these thriving businesses. And it also requires consideration of alternate plans for the size and scope of the retention area and even a reconsideration of the areas to be rezoned themselves.

Studying indirect displacement is also critical. We are particularly concerned that small businesses along Jerome Avenue will be displaced as a result of shifts in the market that will surely be triggered by this rezoning. For example, a business owned by a small immigrant business owner who lives in Community District 4 or 5, now may no longer be able to maintain their business because their commercial rent has increased as a result of the rezoning. Additionally, the change in demographics may indirectly displace a small business owner because as the residential tenants are displaced the clientele of that business will disappear. How will the rezoning support these small business owners? If there is no support of these small business owners what will happen to their neighborhood-based employees?

We believe that the existing residents of Community Districts 4 and 5 would like to see progress in their communities but not at the cost of their culture and displacement, for then they will no longer be their communities. The path to prevent the displacement of existing long-term residential and commercial tenants is to at least assess the ways in which rezoning displaces existing tenants, and that includes a deeper assessment of indirect displacement than is currently reflected in the Draft Scope.

On behalf of Bronx Legal Services and Legal Services NYC we thank you for your time and for giving us the opportunity to testify here today.

UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA
NEW YORK CITY & VICINITY DISTRICT COUNCIL OF CARPENTERS

JOSEPH A. GEIGER
Executive Secretary - Treasurer

STEPHEN C. McINNIS
President

MICHAEL P. CAVANAUGH
Vice President



INSTITUTED AUGUST 12TH, 1881

395 HUDSON STREET - 9TH FLOOR

NEW YORK, N.Y. 10014

PHONE: (212) 366-7500

FAX: (212) 675-3118

www.nycdistrictcouncil.com

Good Afternoon. My name is Sinade Wadsworth and I am here representing the New York City & Vicinity District Council of Carpenters, a representative body comprised of nine individualized locals, and 25,000 members.

I have been a member of the Carpenters Union for four years and am a resident of the area that will be impacted by the Jerome Avenue rezoning. The draft scope of work for the environmental impact study is concerning for a number of reasons, with the primary reason being its failure to address the quality of the construction jobs being created. The Bronx has seen an influx of development, yet many residents in the borough have yet to see the economic benefits. There is 15 percent unemployment in the area covered by the draft scope of work, a percentage that our elected officials should consider unacceptable. The creation of affordable units could generate hundreds of quality construction jobs for local residents, yet there is no plan to do so. Bronx residents earning middle class wages will positively impact the local economy and change the lives of my friends and neighbors for the better. The creation of low paying construction jobs would be a disservice to my community and would do nothing to uplift the Bronx. We can do better. We must do better. We can build affordable housing and create quality construction jobs.

In addition to not addressing the economic impact of the type of jobs being created, the draft scope of works fails to highlight the potential hazards of having unskilled labor on this massive rezoning. In New York City, construction fatalities have steadily increased over the last four years. Construction accidents have also been on the rise. Over this time, there has also been an increase in the use of untrained, unskilled labor on construction sites across the city. As a union member, I have received extensive training and hold a number of certifications. On jobsites, I understand and practice the proper safety protocols and wear all of the necessary safety equipment. By following these safety protocols, I protect my fellow workers, the general public and myself. Untrained workers that have not participated in a New York State certified apprenticeship program might not be aware of the safety procedures that will keep themselves and others safe. The draft scope of work should consider studying the potential impacts of an untrained workforce on the community and surrounding environment. The safety of pedestrians and workers must be considered when studying the potential impacts of the rezoning. The administration has a responsibility to workers and the general public to consider construction safety in the EIS.

Thank you for taking the time to consider my testimony.

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Thank you for taking the time to consider my testimony.

From: [Wells, Owen \(Parks\)](#)
To: [Evren Ulker-Kacar \(DCP\)](#)
Subject: RE: request for CEQR # 17DCP019X Reference # 17DCP019X-09-29082016140849
Date: Friday, September 30, 2016 1:05:10 PM

Hi Evren-

Thanks for the presentation to the CCTF earlier. As mentioned briefly on the phone, a couple questions on the scope:

- Methodology text for open space and shadows looks fine. For Figure 8, please confirm whether Census Tract 63 is supposed to be part of the study area - just roughly eyeballing it, it seems that it might be less than 50% within the radius?
- The other question is related to the project description. It's my understanding that there may be a plan for Lots 32 and 27 (on Figure 4b) to be transferred to HPD for housing development, with the idea that Corporal Fischer demapping would provide compensating replacement parkland. Is there a reason why this potential development and associated alienation isn't being included here? It seems like it could make for complications down the line if those are indeed intended for housing, since Corporal Fischer demapping would have already occurred and there wouldn't be a replacement to link with alienation of those parcels.

From: Evren Ulker-Kacar (DCP)
Sent: Monday, August 29, 2016 2:56 PM
To: Alderson, Colleen (Parks); Wells, Owen (Parks)
Cc: Robert Dobruskin (DCP); Olga Abinader (DCP); Evren Ulker-Kacar (DCP)
Subject: request for CEQR # 17DCP019X Reference # 17DCP019X-09-29082016140849
Importance: High

Hello,

Please log into CEQR-View to view the details of this request and provide an acknowledgement that you have recorded it.

Thank you

Additional Notes:

Please review the Draft Scope of Work located at:

\\mscscnetapp001a.csc.nycnet\OEC\CEQR_View\2017\17DCP019X\non_record_documents\background_documents

For reference, the EAS is also located in the same folder. Please note that a public scoping meeting is scheduled for 9/29/16 and a CEQR Complex Planning meeting will be held as part of the CEQR Task Force Meeting on 9/22/16.

Thank you.

Testimony Myrtle Wilson
Topic Jerome Avenue Neighborhood Planning Study Environmental Scoping Meeting
Date Thursday, September 29, 2016

Good evening, my name is Myrtle Wilson and I am a proud member of Laborers Local 79. I want to thank the Department of City planning for allowing my community to express our concerns with the city's proposal to rezone 73 blocks along Jerome Avenue.

This rezoning will change the landscape and character of my community. My biggest worry is that this historic land change will be a lost opportunity to create real career-track jobs for my neighbors. The plan that has been proposed makes no mention of the workforce needed to build 3,250 new apartments and is silent on worker safety.

As a woman in the unionized building and construction industry, I know how a good paying job with benefits and retirement security can drastically elevate our lives and immediately create a pathway to the middle-class. I have worked in both the union and non-union side of this industry and it would be disheartening if low-road contractors that provide no training, no safety and exploit our most vulnerable workers come into my community to make high-profits for nothing in return.

In the non-union industry, women in the workplace are virtually non-existent. They don't care to provide women with the same opportunities as our male counterparts, they evade labor laws, and worker safety is not a priority. It didn't take long for me to realize I needed to make a better way for myself. I stand here now as a skilled union laborer in the building and construction trades who wants a commitment from the city of career-track jobs for women and minorities in my community. Together we can make this happen.

Local hire requirements along with access to NYS approved apprenticeship programs will spawn the positive change our community needs. This is the plan I want to support. Not a plan that leaves it open for unscrupulous contractors to keep abusing our tax dollars without accountability.

I was raised in the South Bronx during the era of abandoned lots and burned out buildings. Our community wants change, but not if we are not included in this change. We don't deserve to be left behind. We want a plan that is inclusive and requires local hire, the utilization of NYS approved apprenticeship programs, deep affordability and protects our residents from displacement.

We, as a community, will oppose this rezoning if our demands fall on death ears. I urge the city and Department of City Planning to NOT move forward with the certification of this rezoning until *ALL* social impacts have been fully studied.

Thank you for your time.

From: Wimbish, Mitchell
To: [Evren Ulker-Kacar \(DCP\)](#); [Estesen, Terrell](#)
Cc: [Robert Dobruskin \(DCP\)](#); [Olga Abinader \(DCP\)](#)
Subject: RE: request for CEQR # 17DCP019X Reference # 17DCP019X-09-29082016140831
Date: Wednesday, September 21, 2016 3:37:00 PM

Hi Evren

DEP has reviewed the EAS and Draft Scope of Work for the Jerome Avenue Rezoning project and has no comments.

Thanks

Mitchell Wimbish | Project Manager | NYC Environmental Protection
Bureau of Environmental Planning & Analysis | Office of Wastewater Review & Special Projects
718 595 4451 | mwimbish@dep.nyc.gov

From: Evren Ulker-Kacar (DCP) [mailto:EULKER@planning.nyc.gov]
Sent: Monday, August 29, 2016 2:55 PM
To: Estesen, Terrell <TerrelLE@dep.nyc.gov>; Wimbish, Mitchell <MitchellW@dep.nyc.gov>
Cc: Robert Dobruskin (DCP) <RDOBRUS@planning.nyc.gov>; Olga Abinader (DCP) <OABINAD@planning.nyc.gov>; Evren Ulker-Kacar (DCP) <EULKER@planning.nyc.gov>
Subject: request for CEQR # 17DCP019X Reference # 17DCP019X-09-29082016140831
Importance: High

Hello,

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Thank you

Additional Notes:

Please review the Draft Scope of Work located at:
\\mscscnetapp001a.csc.nycnet\OEC\CEQR_View\2017\17DCP019X\non_record_documents\background_documents
For reference, the EAS is also located in the same folder. Please note that a public scoping meeting is scheduled for 9/29/16 and a CEQR Complex Planning meeting will be held as part of the CEQR Task Force Meeting on 9/22/16.
Thank you.



PROPOSED JEROME AVENUE REZONING
Comments on the Draft Scope of Work for a Jerome Environmental Impact
Statement (EIS), CEQR No. 17DCP019X
Prepared by the Women's Housing and Economic Development Corporation
October 7, 2016

Introduction

The Women's Housing and Economic Development Corporation (WHEDco) is a community development organization founded on the radically simple idea that all people deserve healthy, vibrant communities. WHEDco's mission is to give the South Bronx access to all the resources that create thriving neighborhoods – from sustainable, affordable homes, high-quality early education and after-school programs, to fresh, healthy food, cultural programming, and economic opportunity.

For almost 25 years, WHEDco has served thousands of children, youth, seniors and families who live in and around the Jerome Avenue Study Area from our headquarters in the former Morrisania Hospital building at East 168th Street and Gerard Avenue. Our comprehensive community development approach also includes improving the commercial corridors in the neighborhoods where our affordable housing developments are located. Our typical practice begins with studying the commercial corridor through surveys, one-on-one conversations with local stakeholders and business owners, physical assessments of the neighborhood, and collecting demographic and socioeconomic data. We employ this data to guide our efforts to strengthen the community and ensure that local businesses are serving community needs.

In early 2016, WHEDco worked with the NYC Department of Small Business Services (SBS) to conduct a Commercial District Needs Assessment (CDNA) of the Jerome Avenue Study Area south of the Cross-Bronx Expressway. The CDNA includes socioeconomic data collection, assessments of local stakeholders and elected officials, an inventory of local businesses, assessments of physical conditions of buildings and parks and open space, and surveys of local shoppers, business owners and property owners. WHEDco used this information to enhance our own understanding of the Jerome Avenue corridor, part of several neighborhoods that we have served since our founding in 1991; and to make recommendations to SBS for services that might assist local business owners.

Given our decades' long experience in both housing development and programs for area families and businesses, WHEDco takes great interest in the Jerome Avenue Neighborhood Study and rezoning plan, particularly the impacts that this plan will have on local businesses, the residents we serve and the neighborhood itself. This testimony will provide direct responses to specific sections of the draft EIS scope released by the NYC Department of City Planning (DCP) on August 29, 2016. In general, WHEDco believes that the primary objectives of the proposed rezoning must be to promote the

development of affordable housing units that are truly affordable to current community residents; and to preserve the stable, high-quality jobs already present in the area, especially in the auto industry. We also have concerns about parks and open space; transportation and connectivity; and the health of local businesses, which we will present in relation to the EIS.

Land Use Objectives

The Land Use Objectives outlined by DCP in the draft EIS scope do not go far enough in ensuring that the rezoning plan will benefit the local community. Specifically:

- *Permanent affordable housing* – New York City is in the midst of an affordable housing crisis. DCP clearly recognizes this, and this rezoning will allow them to employ the tool of Mandatory Inclusionary Housing (MIH) to create new affordable housing units. However, the existing MIH program will not provide enough units at levels of affordability deep enough to serve the majority of existing residents in the neighborhoods surrounding Jerome Avenue. DCP must encourage the Mayor and HPD to create alternative programs that will provide more new units for people making 30% AMI or below.

As affirmed in our spoken comments at the public hearing on the Draft EIS Scope on 9/29/2016, New York City cannot build its way out of this affordable housing crisis. The cry for deeper and permanent affordability—from service providers like WHEDco, community members, research and policy analysts, legal services specialists, and others—many represented at the recent public hearing, continues unabated, and with good reason. The Furman Center has found that New York City has lost nearly 400,000 affordable apartments to new development and deregulated rents since 2002. Faced with economic hardship, declining tenant subsidies, limited housing supply, aging housing stock (80% built before 1947), and increasing harassment and neglect by landlords, thousands of vulnerable New Yorkers in the proposed Jerome Rezoning Area are at risk of losing their homes.

This reality exacerbates an already acute housing crisis and further underscores the inadequacy of the small percentage of new affordable units that the proposed rezoning in the Jerome area would create. While new buildings are critical, we believe that stemming the tide of displacement is even more urgent, as it is taking place even as shovels break ground on new apartments. Therefore, we implore DCP to encourage the Mayor and HPD to increase funding and programs for the *preservation* of existing affordable housing units, to hold landlords accountable and to ensure safe, affordable, stable and livable housing conditions for New York families. As discussed in a later section, the EIS should also examine the impact of the proposed rezoning on indirect residential displacement in the Jerome Rezoning Study Area. We ask that the methodology for preserving affordable housing units and mitigating residential displacement be explicitly addressed and included in the Jerome Avenue Neighborhood Study and resulting Plan.

- *Ensure that new buildings fit into existing neighborhood contexts* – The existing conditions around Jerome Avenue mostly consist of one- or two-story commercial or industrial buildings, many of which were built in the 1920s and 1930s. The proposed rezoning plan recommends preserving the existing zoning in so-called “retention areas,” which would preserve this low-slung industrial character, yet also recommends placing the highest density residential developments – R-9A – right next door. We are concerned about the conflicts that might arise between high-density housing and industrial uses – increased traffic and parking demands, impediments to pedestrian traffic on streets and sidewalks, etc. We encourage DCP to study these potential impacts, as well as recommend design guidelines that ease the visual transition (from high-rise residential to low-rise industrial) between these zones.
- *Special provisions for buildings next to elevated rail line* – We support the proposed action’s special bulk modifications for zoning lots fronting the elevated rail line, which will permit more light and air under the elevated line when taller buildings are constructed. However, we encourage DCP to consider exterior lighting requirements that may improve nighttime visibility and safety under the elevated line, and any and all possible treatments that might reduce the noise under the elevated line.
- *Promote active ground floor uses* – While it is critical to a healthy streetscape to provide active uses on the ground floor of new developments in the study area, it is equally critical that these uses serve community needs. Shoppers and business owners south of the Cross-Bronx Expressway have expressed a need for sit-down restaurants with greater variety of cuisine, health and fitness activities, and children’s stores, among others. DCP should include a complete retail needs assessment in the EIS (discussed further below) and should explore ways to encourage ground-floor commercial uses that meet these needs.
- *Anchor corridor with intensive uses at two nodes* – As DCP has noted, the intersection of Jerome Avenue, East 167th Street and Edward L. Grant Highway is dangerous and in need of improvement. We commend the DCP Transportation Division’s Cromwell Avenue – Jerome Avenue Transportation Study recommendations to improve safety for drivers, pedestrians and cyclists at this intersection; the study includes two proposals that would reduce traffic hazards and increase pedestrian space. As mentioned above, we foresee increased conflict between the proposed high-rise residential developments and preserved industrial use in this area, and we hope that improvements to this intersection will ease some of that conflict.
- *Preserve zoning for heavy commercial and light industrial uses* – First and foremost, we do not believe that enough land area will be preserved for heavy commercial and light industrial uses, or especially for auto uses, under the proposed zoning plan. The proposed plan only preserves 17% of the land area currently available for auto-related uses, within so-called “retention areas.” Only 28% of existing auto businesses are in these retention areas, and only 26% of Jerome’s auto repair workers are employed by these businesses. This is simply not enough. Given the many auto businesses and workers who were forced to move from Willets Point, Queens after that area’s rezoning, but whose *multi-*

million-dollar City-financed technical assistance and relocation to the South Bronx have reportedly stalled more than one year later (New York Times, 10/7/2016), we are even more concerned about the elimination of auto-related uses in the Jerome Rezoning Study Area. We strongly propose creating an additional retention area or expanding current retention areas to protect more of the existing auto businesses – we will discuss this recommendation further in the discussion of the Proposed Actions below.

Furthermore, we believe that the criteria for selecting the proposed retention areas is flawed: the criteria prioritizes locations that are located *off* of major streets; however, it is important for auto businesses to be *on* a major street, to be closer to the traffic that comes on and off of the Cross-Bronx Expressway. The criteria also considers “unique site conditions that would impede redevelopment” as a reason to preserve existing zoning; the shallow lots located next to the elevated rail line and close to a major highway would seem to fit this description, but they are not included in the retention area. We request that DCP release a detailed explanation of how the proposed retention areas were evaluated and selected.

We commend SBS’s work to develop strategies to support local businesses. As the draft EIS scope notes, these programs “are not part of the proposed actions,” but “are an important component of the neighborhood plan.” This leads us to question the structure of the neighborhood plan, its scope, and above all the responsibility of the City to provide resources for its fulfillment and to enforce its actions with the same strength as the zoning plan. We support the creation of a taskforce made up of elected officials, agency representatives and community residents that will have the power to hold the City accountable to fulfilling the neighborhood plan and will monitor and publicly report on the progress of the plan.

Proposed Actions

WHEDco has several specific concerns related to the proposed zoning map and text amendments, and City Map changes.

- Proposed R9-A district – As noted above, WHEDco has concerns about potential conflicts that might arise between the proposed R9-A districts south of the Cross-Bronx Expressway, surrounding the intersection of Edward L. Grant Highway and 170th Street, and the intersection of Edward L. Grant Highway, 167th Street and Jerome Avenue. This is the highest density district proposed in the rezoning plan, and would permit residential developments of up to 15 stories. Both of the proposed R9-A districts neighbor the M1-2 retention area, which is primarily comprised of government service buildings (NYC Department of Sanitation, US Postal Service), auto services and light industry, and storage facilities. We foresee the following potential conflicts between high-density residential and low-density industrial uses:

- Parking – An increase in residential density will result in increased demand from residents. The auto and light industrial uses already create high demand for parking, often resulting in cars parked on the sidewalk or double-parked in the street.
- Walkability – An increase in residential density will result in more people on the street. The parking challenges noted above already create conflicts for pedestrians, who have to navigate parked cars, moving heavy equipment, and environmental pollutants created by the auto and industrial uses.
- Indirect displacement pressure – Perhaps the most dangerous, yet most intangible conflict between high-density residential and low-density industrial uses is the pressure that residential development will create on industrial uses to relocate. Residential development will increase land values in the surrounding area, making it more attractive for developers to seek spot rezonings or to redevelop single-story industrial properties to higher-density buildings that serve different uses. In addition, the parking and walkability conflicts described above may result in complaints from residents, further discouraging industrial use nearby. To mitigate this scenario, we recommend that DCP explore protections that may be applied to the retention areas that would relieve development pressure and make it easier for auto and industrial uses to stay in the area. For example, DCP might apply one of the protections outlined in the Mayor’s Industrial Action Plan, to limit new hotels and personal storage in industrial areas.
- Proposed City Map Changes for Corporal Fischer Park – While we commend the City for altering the City Map to incorporate Corporal Fischer Place and designate both lots as parkland, this is only a small win for a neighborhood that desperately needs active, outdoor green space. We will discuss the draft EIS scope’s assessment of open space below.

Analysis Framework

The general criteria for development sites, as well as sites that are considered projected versus potential sites, are included in the draft EIS scope. We request that the detailed analysis of all development sites – how the general criteria were applied to each site, and how the classification of each site was determined - be included in the FEIS. We request the detailed analysis because the classification of some of these sites is unclear: for example, some City-owned sites are rated less likely to be developed, and at least one property owner planning to sell is also rated less likely to be developed. We believe that the Reasonable Worst-Case Development Scenario may need to be revised to more accurately reflect existing conditions and the possibility of development. We also request that the FEIS include a description of existing conditions in terms of the square footage occupied by land use category (for example, a column for existing conditions might be added to Table 1 on page 27 of the draft EIS scope).

Proposed Scope

WHEDco does not have comments on all of the tasks included in the draft EIS scope; only those tasks that generated questions, comments or recommendations will be discussed below.

Task 2: Land Use, Zoning and Public Policy

- This task includes a land use assessment that considers the proposed action's compliance with and effect on "other applicable public policies." While the plan lists Housing New York as an applicable public policy, it is not clear if Mandatory Inclusionary Housing (MIH) is included in this assessment. We recommend that this assessment include a detailed analysis of how MIH may be applied in the study area after the proposed action, how many affordable housing units may result from the application of MIH, and the anticipated level of affordability those units will provide.
- This Task will "identify, describe, and graphically portray predominant land use patterns" in the study area. This description must include the auto industry, which dominates the commercial landscape in the area, and must reflect an understanding of why the auto industry is prevalent in the area – namely, proximity to the Cross-Bronx Expressway (I-95) and I-87.
- This Task will discuss the "effect of the Proposed Actions on ongoing development trends and conditions in the study areas." This discussion must consider development and speculation trends occurring across the South Bronx, resulting in rising rents and more frequent occurrences of residential and commercial tenant harassment. The FEIS should answer the question of how the proposed action will impact such trends.

Task 3: Socioeconomic conditions

- One of five principal issues of concern described in this Task is whether proposed actions will have "adverse impacts on specific industries." We cannot accept an FEIS that does not consider the complete removal of square footage for auto business use as an adverse impact on a specific industry.
 - We strongly recommend that the FEIS include a complete economic impact assessment of the existing auto industry. This assessment would reveal crucial information that should be considered before deciding the fate of the industry, including answering questions like: how many jobs exist in this cluster, and how many would be lost with the proposed action? What is the salary range of these existing jobs? Do auto business owners and workers live locally? How do auto businesses impact other local businesses? How does this auto cluster perform compared to other auto clusters around the City? How many auto clusters are there around the City, and are other clusters capable of absorbing relocated auto businesses and/or their customers? Where do customers come from, and where might they go if the cluster is relocated? How much money does the auto industry contribute to the local economy?

As previously mentioned, given the many auto businesses and workers who were forced to move from Willets Point, Queens after that area's rezoning, but whose *multi-million-dollar City-financed* technical assistance and relocation to the South Bronx have reportedly stalled more than one year later (New York Times, 10/7/2016), it is imperative that the adverse impact of the proposed rezoning on the *thriving* auto industry in the Jerome Rezoning Study Area, and multiplier effects in the local economy be assessed.

- Similar to the land use assessment discussed above, Task 3's assessment of indirect residential displacement does not appear to consider the increase in harassment, evictions, holdovers, etc. that arises when land values rise, or whether trends of development and displacement in the South Bronx may be exacerbated by the proposed actions.
- WHEDco strongly recommends that the FEIS include a retail needs assessment to complement the study of direct and indirect business displacement and inform potential mitigation. A retail needs assessment would determine:
 - What is the anticipated income range of the incoming population after the proposed action? This is dependent upon an assessment of the new affordable housing units that may be created under MIH, as recommended above, as well as an assessment of current and predicted trends in market rate rent and increased density in the study area.
 - What is the buying power of the existing population (within a certain radius of the study area), and how might this change with the incoming population after the proposed action?
 - How much retail square footage is required to serve the incoming population?
 - How many jobs may be created by increased commercial square footage? In which sectors might these jobs fall, and what are the typical salary ranges for these sectors in the Bronx and in New York City?

Task 4: Community Facilities and Services

We recognize that this Task will include an assessment of the capacity, enrollment and utilization of local public schools. We recommend that the FEIS include an analysis of publically-funded after school programs, as well as programs for teenagers and young adults, that serve the study area, and include mitigations to ensure that enough seats (and in turn, enough funding) will be created to serve the increased population after the proposed action.

Task 5: Open Space

This task will include a qualitative assessment of “whether or not the study areas are sufficiently served by open space, given the type (active vs. passive), capacity, condition, and distribution of open space, and the profile of the study area populations.” We will not accept a FEIS that does not acknowledge that the study area is underserved by open space, considering the poor condition of the existing open space, the lack of greenery and the lack of active space.

As mentioned above, we commend the change to the zoning map related to Corporal Fischer Park. However, we request clarification on the results these changes will achieve: Lot 19 already appears to be zoned as a park and is owned by the NYC Department of Parks and Recreation, and yet the lot has been fenced off and closed to the public for years. Will the proposed map changes result in the development of this park as a usable public space?

Also, we strongly recommend a reconsideration of Jerome Playground, and encourage the City to consider swapping that site – which may be better suited to auto or other light industrial use given its proximity to the Cross-Bronx Expressway – with another site that is closer to residential development, easier for pedestrians to access, and less exposed to environmental pollutants created by the highway.

Task 8: Urban Design and Visual Resources

This Task includes an assessment of projects “that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline.” We urge the City in these assessments to pay special attention to the blocks where the zoning will transition between M1-2 and R9A districts, considering the potential conflicts between these zones that we discuss above. The proposed action will result in a change in building height, and will potentially invite changes to the existing character of this area, which has long been home to industrial and manufacturing buildings. On side streets like Inwood Avenue and Crowell Avenue, simple brick facades are still visible, while on main streets like 170th Street, 167th Street, and Mount Eden Avenue, more detailed facades in brick and stone are hidden behind decades of additions and signage. We encourage the City to consider creating guidelines – for building height limits, façade materials and colors, signage sizes and standards – that would preserve the existing warehouse/manufacturing building character.

Task 13: Transportation

We commend DCP’s Transportation Division on a useful and thorough study of transportation mitigations in the Jerome Avenue study area. We would like to make the following comments on that study:

- The Transportation Study designates Cromwell Avenue but not Inwood Avenue as a “local roadway.” Our observations of Inwood Avenue suggest that it is similar to Cromwell Avenue, in that it is not a significant draw for pedestrians but it does generate significant auto traffic due to its numerous auto-related uses. We suggest that Inwood Avenue also be considered an important local roadway and be incorporated in the EIS study and findings accordingly.
- The Transportation Study acknowledges that Jerome Avenue is a truck route for “various retail establishments and auto-related uses.” We recommend that the FEIS include projections for increased truck traffic based on the increased retail

- square footage, and consider potential mitigations to prevent this increased demand from negatively impacting traffic flow and pedestrian experience.
- DCP notes that the Transportation Study's recommendations were shared with NYC Department of Transportation (DOT) and that proposed treatments were developed together. We recommend that the FEIS include discussion of when and how these treatments might be implemented.
 - The analysis of the intersection of Jerome Avenue, East 168th Street and Gerard Avenue does not include the adjacent intersection of East 169th Street and Gerard Avenue. WHEDco frequently observes drivers speeding westbound on East 169th Street, where they are forced to turn right onto Gerard Avenue because East 169th Street between Gerard Avenue and Jerome Avenue is frequently closed by the NYPD to serve as a makeshift parking lot for police and employee vehicles. There is no crosswalk on Gerard Avenue crossing East 169th Street, and no stop sign on East 169th Street; cars frequently make the right turn onto Gerard Avenue quickly without heeding pedestrians. Any mitigation to this area should include treatments that would make the intersection of Gerard Avenue and East 169th Street safer for pedestrians.
 - Recommendations to improve the Cross-Bronx Expressway ramps seem to focus on making the area more efficient for cars, but do not directly address improvements that would make the area safer for pedestrians. Any mitigation in this area should include treatments that would make walking along Jerome Avenue across the ramps safer for pedestrians.

We also recommend that the EIS traffic study include the intersection of Inwood Ave at West Mount Eden Ave. While this area was recently reconfigured by DOT (converting West Mount Eden to one-way westbound and adding a sidewalk on the north side of the street), the proposed rezoning would concentrate industrial uses on Inwood Avenue and Cromwell Avenue, which may impact traffic flow moving from the Cross-Bronx Expressway along West Mount Eden Avenue and turning left on Inwood Avenue. Also, NYC Parks has expressed interest in improving Inwood Playground, which may require further actions to improve pedestrian access to the park.

With over 35,000 clients served each year and 300 staff, we affirm the community's repeated requests for the EIS to study and consider seriously the impact of the proposed rezoning on the transit infrastructure, particularly the already overcrowded 4/B/D MTA train lines. We affirm the importance of studying the need for ADA accessible transit stations as well. Clear plans to mitigate any potential impacts will be crucial to ensuring a livable neighborhood for existing and any new residents.

With regard to parking, we recommend that the EIS include analysis and recommendations for parking that serves the auto and industrial uses, which otherwise are forced to park cars on the sidewalk or double-park in the street. We also request that the EIS include data on drivers who work but do not live in the study area, as this appears to make up a significant percentage of people who drive to the study area.

Task 14 - 16: Air Quality, Greenhouse Gas Emissions, Noise

We recommend that these Tasks include assessments at the Cross-Bronx Expressway interchange and consider the impact of this congested intersection on the health of pedestrians and public space users. Assessment of environmental impacts at this location are especially important if the proposed action and neighborhood plan are to promote increased use of pedestrian crossings and public spaces around the interchange.

Task 17: Public Health

We recommend that this Task include an analysis of street trees and green open space and notes the positive impact that these amenities can have on public health. Trees and green space can reduce air pollution, provide shade, and divert water from entering the City's combined sewer system, plus they can provide spaces for active and passive recreation.

We also recommend that this Task analyze and seriously consider the impact of the Proposed Actions on family stress and the health of families and children in the Jerome Rezoning area. Through WHEDco's work supporting families with a continuum of services, from emergency food to eviction prevention and counseling, we have found that housing stress and limited access to other economic resources can adversely impact health. The National Center for Children in Poverty has found that rent burden can lead to both material hardship (not having enough money for other items) and family stress, which is especially acute for children. We thus encourage a meaningful assessment of the effect of any development and displacement spurred by the Proposed Actions on families generally, and the youngest members of our community specifically.

Task 18: Neighborhood Character

As noted above, WHEDco strongly believes that the existing auto industry is a defining feature of the existing neighborhood character. The proposed actions will undoubtedly affect this defining feature, and thus we believe a detailed analysis must be conducted. Further, we recommend that the proposed action be adapted to better preserve the auto industry, by expanding the retention areas, adding protections to the retention areas that strengthen the auto industry, and creating design guidelines that protect and preserve the industrial character of the buildings in the study area.

Task 19: Construction

This Task includes an assessment of "technical areas," including "socioeconomic conditions," for "potential construction-related impacts." We recommend that this assessment include estimates of potential jobs (both construction jobs and jobs that support the construction industry, like food service, retail, manufacturing, etc.) created during the construction phase of the plan. We also encourage DCP to include in its neighborhood plan an enforceable plan to require the hiring of local residents to fill these new jobs.

Task 20: Mitigation

WHEDco seeks clarification about the mitigations that will be included in this Task. While these mitigations will be developed and coordinated with the responsible City/State agencies, is there any guarantee that said agency will complete the mitigation? We recommend that the proposed action make these mitigations legally binding, especially those mitigations that resolve significant adverse impacts. Again, we support the creation of a task force made up of elected officials, agency representatives and community residents that will have the power to hold the City accountable to fulfilling the neighborhood plan and will monitor and publicly report on the progress of the plan.

Task 21: Alternatives

As mentioned above, we recommend that the EIS study an alternative that adds an additional retention area and/or expands current retention areas to capture more existing auto businesses. We recommend an additional retention area on the east side of Jerome Avenue between East 172nd Street and the Cross-Bronx Expressway, but we would consider other locations.

Conclusion

WHEDco is grateful to the City of New York for the opportunity to participate in the proposed Jerome Avenue Rezoning process. We recognize the immense time and effort spent, and the strides made to collaborate more closely with community members. Every day, hundreds of WHEDco staff and thousands more clients travel to the former Morrisania Public Hospital where we work. Abandoned by the City in 1976, the building sat hulking, vacant and devoid of vital City services for almost 20 years. Even here, it is impossible to forget the recent history of disinvestment in the South Bronx. Members of this diverse, hardworking, Jerome community of color are the reluctant bearers of that history, all of its pain and triumphs. They are also keenly aware of the sad plight of the thousands of other low-income New Yorkers and small businesses displaced by prior neighborhood rezoning: Downtown Brooklyn, East New York, Willets Point. While the City may feel equipped with better approaches and new tools (like MIH), we cannot dismiss Jerome Area residents' legitimate concerns, however passionately or volubly expressed, about the impact of this proposed rezoning on their neighborhood's character, their families, area services, local businesses, and local jobs.

The gritty independence and dignity of the people of this South Bronx neighborhood—suddenly the focus of City agencies and developers alike—are hard-earned and constantly tested. We applaud this Administration's recognition of the dire need for affordable housing and goal to using zoning as one of the tools to respond to current and future need. In the past 10+ years, rezoning has at times been used as a protective measure to preserve the historical character and existing context of low-density, wealthier residential neighborhoods. We observe, however, that vibrant but vulnerable neighborhoods of color seem to bear the physical, cultural and socioeconomic brunt of rezoning intended to bring the City's high-density Affordable Housing Initiative to

fruition. Through the Department of City Planning and its sister agencies, the City of New York has a chance to responsibly and comprehensively assess the impacts of the proposed rezoning on this unique neighborhood, develop a funded and legally enforceable multi-agency Jerome Area Neighborhood Plan, and revise the proposed rezoning to reflect both the EIS findings and the rich context, history, concerns and hopes of the families, immigrants, and small businesses who for decades have endured and thrived here.



Vincent Sapienza
Acting Commissioner

James J. Roberts, P.E.
Deputy Commissioner
Bureau of Water &
Sewer Operations

59-17 Junction Boulevard
Flushing, NY 11373

watersewerplanning@dep.nyc.gov

MEMORANDUM

To: Mitchell Wimbish
Terrell Estesén
BEPA

From: Guo Zhan Wu *GW*
BWSO

Subject: CEQR 17DCP019X
Jerome Avenue Rezoning
Borough of the Bronx

Date: September 21, 2016

This is in reference to the Environmental Assessment Statement received by BEPA from the New York City Department of City Planning (NYCDCP) which BWSO received on September 6, 2016. Please be advised of the following comments.

1. There are combined sewers fronting the projected development sites. During the submittal of the site connection proposal applications of these sites, please restrict the storm flow per the following:
 - a. As per the new stormwater requirements, the Stormwater Release Rate must be no more than the greater of 0.25 cfs or 10% of the Allowable Flow or, if the Allowable Flow is less than 0.25 cfs, no more than the Allowable Flow. Allowable Flow is defined as the stormwater flow from a development that can be released into an existing storm or combined sewer based on existing sewer design criteria.
 - b. Specify a method of retaining or detaining the site generated storm flow that adheres to the Stormwater Release Rate requirements stated above.
2. The proposed rezoning results in an increase of 101% for the sanitary flow in the adjacent sewers. Therefore, there will be a need to amend the existing/pending City Drainage Plan. In addition, a hydraulic analysis of the existing sewer system may be needed to determine whether the existing sewer system is capable of supporting higher density development and related increase in wastewater flow.
3. Comments regarding the city map changes may follow after the submission of the associated ULURP application.

4. There is an existing 168" storm relief tunnel sewer traversing potential development sites 56, 57, and 58. Attached please find a letter dated June 6, 2016 to NYCDCP in regards to potential site 56, wherein DEP requested additional information. The same information should be applied to potential sites 57 and 58 as well. Please submit the requested information to DEP.
-

C: Jannine McColgan, P.E., Director, Water & Sewer Planning
Ketki Patel, P.E., EIC, Drainage & Modeling
Andy Lu, Review Engineer
File; AL/al
Record No. 38558



**Environmental
Protection**

*Emily Lloyd
Commissioner*

**James J. Roberts, P.E.
Deputy Commissioner
Bureau of Water &
Sewer Operations**

59-17 Junction Boulevard
Flushing, NY 11373

June 6, 2016

Mr. Howard Slatkin
Deputy Executive Director Strategic Planning
NYC Department of City Planning
120 Broadway, 31st FLOOR
New York, NY 10271

Re: 1491 Jerome Ave
Bronx, NY

Dear Mr. Slatkin:

The New York City Department of Environmental Protection (DEP) is aware of the proposed development at the above mentioned property. This letter is to reiterate our June 2nd phone conversation regarding the proposed development in relation to the existing sewer located below the property. We understand the request to determine the construction boundaries above and adjacent to our sewer. To be able to provide meaningful assessment DEP is requiring the following information:

1. Subsurface soil conditions and survey of sewer in relation to the proposed property,
2. Geotechnical borings and report for the subsurface soil and rock conditions, and
3. Proposed building structure and foundation type.

Upon receipt of the requested information we would be happy to review the information with DCP staff and developer's engineering team and work towards a common understanding of the proposed development in relation to the sewer.

Sincerely,

James J. Roberts, P.E.
Deputy Commissioner
Bureau of Water and Sewer
Operations

C: J. McColgan, P. E., NYCDEP

FERNANDO CABRERA

COUNCIL MEMBER, 14TH DISTRICT, BRONX

DISTRICT OFFICE

107 E. BURNSIDE AVE
BRONX, NEW YORK 10453
TEL: (347) 590-2874
FAX: (347) 590-2878

CITY HALL OFFICE

250 BROADWAY,
17TH FLOOR
NEW YORK, NY 10007
TEL: (212) 788-7074
FAX: (212) 788-8849



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ADDENDUM TO STATEMENT ON JEROME AVENUE REZONING

November 7, 2016

Thank you for the opportunity to submit additional testimony on the Jerome Avenue rezoning. As Council Member for this district this issue is very important to me. I worked to expand the footprint of the rezoning to its current range and I continue to receive comments and recommendations from Council District 14 community boards, residents and neighborhood organizations

The Jerome Avenue Corridor is a crucial part of my district. The #4 train, NYC Transit buses and retail support the surrounding residential community and generate a tremendous amount of activity, pedestrian and vehicular traffic.

The proposed rezoning comes at an important time, when we are experiencing a critical need for affordable housing, community facilities, safe, attractive, pedestrian-friendly areas and full utilization and diversification of commercial spaces.

The *“Draft Scope of Work for an Environmental Impact Study,”* notes that the current land use pattern is nearly 100 years old, when the Jerome Avenue Corridor was developed to accommodate parking for dense residential developments in the area. The Draft Scope of Work further notes that this pattern was basically “frozen” into place by the 1961 zoning.

Clearly, it is time for a change. Based on the expressed needs of my constituents I support the following land use objectives of the Jerome Avenue Plan:

AFFORDABLE HOUSING AND RETAIL DEVELOPMENT

- High quality, permanent affordable housing with option for tenants at a wide range of income levels, including provisions to ensure that current rent stabilized apartments are preserved with the goal of increasing permanent housing and decreasing temporary/shelter housing
- New construction that fits visually and architecturally into the surrounding neighborhood
- Provision of light and air along the Jerome Avenue Corridor through creation of special rules for new development along the elevated rail line

- Permitting more intensive uses in two nodes to anchor the neighborhood and corridor, such as office space, and entertainment
- Promotion of active ground floor uses and diverse retail to support community needs and provide consistent streetscape throughout the corridor, with community participation and input in concert with SBS, merchants associations and BIDS to source commercial tenants for these spaces
- Local hire practices and union labor must be part of the redevelopment with required utilization of the NY State Department of Labor Registered and Approved apprenticeship Program and highest level of safety training to ensure work site and community safety

PARKING

- Parking for private vehicles is currently inadequate. The rezoning must address this issue for community residents, schools, businesses, etc.

AUTO INDUSTRY

One of the most important issues in this rezoning is the employment and local revenue generated by the auto industry. I have had detailed discussions with the leadership and representatives of the local industry and we are looking a number of options to preserve the industry and its jobs including training for business development and expansion. Among approaches to be considered are the following:

- Assistance to auto businesses for relocating to a suitable area
- Assistance to auto businesses with regulatory compliance and licensure
- Job training, skills development for owners and employees in automotive technology and other industry related areas to facilitate professional development
- Skills development and placement assistance in other areas for those who wish to work in other trades and professions such as construction, healthcare, HVAC, technology, etc.

EDUCATION

Additionally, the increase in affordable housing will necessitate additional school/classroom space, the amount to be determined by a comprehensive study. New classroom space should be included in the final Scope of Work. Additional solutions are as follows:

- Construction of a high school on the Bronx Community College campus
- Additional high school classrooms in Community Board 5 area in addition to those specifically allocated to the high school at Bronx Community College
- Increase in the allotment of Universal Pre-K and day care slots to accommodate additional families with children

PUBLIC SAFETY

Public safety is one of my top priorities and continues to be a major concern among residents of Community Boards 4 and 5. I support the following:

- Increased funding and other measures to improve 911 emergency response time
- Increased number of school crossing guards
- Greater funding and other types of support for Operation Clean Hallways Program to stop indoor drug dealing and loitering

PUBLIC TRANSIT

The anticipated increase in population in the community as affordable housing is developed will impact public transit, further highlighting the current need for improvements to existing transportation infrastructure, specifically connectivity and accessibility. A number of constituents have indicated the need for an elevator at the Jerome Avenue/Burnside Avenue station on the #4 line. Currently there is no elevator on this line from 167th Street to 183rd Street, on the B/D line from 167th Street to Fordham Road.

- The construction of an elevator at Jerome Avenue/Burnside Avenue is most critical
- Number of buses and timeliness of service must be increased to accommodate the residential and commercial population increase to the area

HEALTH AND WELLNESS

The Community Board 5 area has one of the highest numbers of asthma-related hospitalizations in New York City. The rezoning of Jerome Avenue must include appropriate action for reclamation and clean-up of the existing industrial sites to ensure health and safety of residential and commercial tenants. This must be followed up by regular monitoring of these sites. In addition, increased attention and resources for pest control and indoor conditions that contribute to respiratory diseases is needed.

Again, thank you for this opportunity. I will continue to work with the community boards, residents, NYC Planning and others to ensure the success of the rezoning.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be the initials 'F. G.' followed by a horizontal line.

DISTRICT OFFICE
1377 JEROME AVENUE
BRONX, NY 10452
(718) 588-7500
FAX: (718) 588-7790

CITY HALL OFFICE
250 BROADWAY, ROOM 1774
NEW YORK, NY 10007
(212) 788-6856
FAX: (212) 788-7764

vgibson@council.nyc.gov
District16Bronx@council.nyc.gov



THE COUNCIL
OF
THE CITY OF NEW YORK
VANESSA L. GIBSON
COUNCIL MEMBER, 16th DISTRICT, BRONX

CHAIR
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RE: Comments Regarding the Jerome Avenue Rezoning Draft Scope of Work for an Environmental Impact Statement (CEQR No. 17DCP019X)

I would like to thank the Department of City Planning for the work that has been done over the past year and a half, in working with the community to provide information and solicit feedback. Real community engagement has been essential throughout this process, beginning with the open houses, vision sessions and roundtable sessions we conducted over the past summer to understand the needs of the community and residents who live and work in the Jerome Avenue rezoning area.

Overview

First and foremost, we need to make sure that the benefits and burdens of the rezoning are equitably shared by the local community and the city at large and that the needs of the community are addressed. We need to make sure that new housing will be built will be affordable for Bronx residents living in the community, from households earning 30% of Area Median Income to families with two working parents.

We must ensure that there are robust strategies in place for preserving existing affordable housing as well as legal services for those threatened with eviction or displacement. There is very little City-owned property in the Jerome Avenue Corridor and we must use whatever opportunities we have to explore ways to achieve 100 percent affordability when disposing of city-owned sites.

My priorities all along have been to address the needs of my constituents and the issue of health care is extremely important. For instance, in the Highbridge and Concourse neighborhoods, the

asthma rate for both children and adults is more than one and a half times greater than the citywide rate. Similarly, the rate of strokes, commonly associated with other detrimental symptoms like high blood pressure, is higher in these areas than the citywide rate. We need to provide access to quality health care and provide education and screening to help prevent these and other problems such as mental health, diabetes and heart disease. We also need to provide residents with healthy lifestyle choices including quality grocery stores and FRESH food stores and retail options beyond inexpensive fast food.

We cannot increase density in this area without addressing the need for improvements to the existing infrastructure, absent any new development and population increases. The following is a list of my priorities based on hundreds of conversations with my constituents:

- Addressing school quality and capacity in School District 9
- Improvements to public transportation for both subways and buses, including handicap accessible subway stations with at least one elevator along the Jerome Corridor
- The need for additional parks and open space, increased planting along the corridor, programming in parks, and additional farmers markets / greenmarkets
- Economic development and retail diversity
- Improvements to mitigate traffic congestion
- Addressing issues with parking on sidewalks by the automotive shops as well as by the police precinct due to lack of parking spaces
- Public access, pedestrian safety and handicap accessibility
- Increased lighting and streetscape improvements to provide a safe and aesthetically pleasing environment along the corridor
- Clean and sanitary streets and sidewalks

These improvements are necessary under existing conditions and essential if we are to proceed with the Jerome Avenue rezoning.

Analysis Framework

I am concerned that the analysis framework as presented in the scope of work does not include all of the development sites and therefore does not accurately project the population growth or the additional resource strain that will be placed on local infrastructure. I recommend the following changes:

- Lots where construction work is actively occurring should be included in the analysis. As we move further along in the rezoning process, developers may decide to wait to complete these projects until the rezoning is approved and redevelop under the future zoning framework.
- Schools sites (public and private), municipal libraries and government offices should be analyzed.

- Lots containing multi-family (6 or more units) residential buildings should be analyzed as well. The Draft Scope of Work removes these buildings from scope due to the required relocation of tenants in rent stabilized units. But owners may have other properties in the area and proceed with relocation and redevelopment. We cannot ignore these impacts.
- The Scope of Work should analyze all city-owned land as being developed into 100% affordable housing

Task 3: Socioeconomic Conditions

Direct Business Displacement

The automotive industry within the rezoning area will be greatly impacted by the rezoning. Table 1 “2026 RWCDs No-Action and with Action Land Uses” identifies a net loss of 98,003 square feet of auto-related uses. The chart does not identify the amount of square feet for existing auto-related uses. Many businesses will be forced to relocate or close leaving many unemployed. A robust plan must be in place to help these businesses and workers either relocate or provide them with programs to learn additional skills and find other employment. The Willets Point rezoning offered an example of the challenges in relocating displaced automotive businesses and we need to do develop a strong framework to support this industry with specific recommendations around compliance, business expansion, and relocation efforts.

Direct and Indirect Residential Displacement

The proposed actions do not exceed the CEQR Technical Manual analysis threshold of 500 displaced residents. Nevertheless, the EIS should include a detailed analysis of direct and indirect residential displacement that will examine whether the proposed actions will introduce or accelerate a socioeconomic trend that may potentially lead to displacement, in particular to renters not protected by rent stabilization or other government regulations.

In order to mitigate the displacement of the existing population, HPD should make significant subsidy commitments for the development of new affordable housing and for the preservation of affordable units in the area. In addition, Mandatory Inclusionary Housing should be implemented to achieve a deep level of affordable housing, by providing for some units at 40% AMI. Additional questions:

- What is the strategy for preserving existing affordable housing?
- What is the strategy for keeping small, unregulated apartments affordable?
- How can we help small homeowners or landlords who are struggling to keep their homes and pay their taxes and bills?

- What are the tenant legal services programs? What does a tenant need to do? When do they apply? And how are they administered?
- Is the senior population at risk and what can we do to help them? How can we incorporate senior housing into this plan?
- How do we transition away from shelter or scattered site approach to a permanent housing strategy for the homeless?

We also need to enact legislation to ensure low income families are not threatened by unfair eviction and are well represented in Housing Court. For instance, Intro 214, the Right to Council Bill, would mandate free legal representation to low-income tenants and homeowners.

The potential for displacement is also impacted by household economic conditions. We need to ensure that the jobs created through this rezoning process will be quality jobs with fair wages. We also need to utilize robust outreach and local hiring strategies, including apprenticeship programs, so that the benefits of this rezoning process can be widely shared. In addition, we must improve our results on local hiring and MWBE procurement. Access to jobs that build sustainability and keep families working benefit our community over all. The rezoning presents a great opportunity for residents with construction experience in the trades, and those able to take advantage of apprenticeship programs, to have a hand in building their own community.

Adverse Effects on Specific Industries

If we are going to displace the existing automotive businesses, the EIS should analyze and identify other sites where these users can relocate, whether in the immediate area or outside the rezoning area. The City needs to provide training and assistance to help these businesses including legal assistance, small business assistance, and compliance assistance. The City needs to provide workforce and training programs for automotive workers who will be displaced as automotive businesses are relocated or closed.

Task 4: Community Facilities and Services

Public Schools

We cannot plan for a large increase in population by only analyzing the quantitative increase in residents and school aged children. We also need to analyze the quality of the existing schools in the area and work to improve existing shortfalls in School District 9

- Are these schools underperforming? Are the schools safe to send our children to? Do they have enough space in the building for all the children or are they overcrowded and operating out of trailers and makeshift classrooms?

- The EIS should coordinate with School Construction Authority to identify sites for potential schools to accommodate the additional capacity and existing capital projects within the SCA Five Year Plan
- What additional funding will be provided in the budget to accommodate the additional students?
- A workforce type option should be initiated to educate at risk young adults, who are not enrolled in school to provide a place where they can learn skills and be trained so that they can enter the job market.

Task 5: Open Space and Recreation

- The rezoning proposal includes changes to the City Map to map Block 250, Lot 19 as parkland. What are the proposed plans for the park?
- The quality of open spaces is a major concern. There are long-standing problems with capital improvements, maintenance, and amenities throughout the parks and streets in the study area.
- Streetscape improvements need to be studied and addressed, especially under the elevated train along the Jerome Avenue corridor and the Cross Bronx Expressway intersection, including lighting, benches, street trees, landscaping, and increased maintenance, and litter removal.
- Community/Recreation Centers: The scope should include a quantitative and qualitative study of facilities that would provide recreational and educational opportunities for all populations. The analysis should assess the need for expansion of existing centers and/or the creation of new facilities.
- We need quality places for young people to go outside of school. A study of the existing facilities will help us understand the need, and identify locations and programs to provide preschool and school-age children with safe places to socialize, exercise, and learn.

Task 7: Historic and Cultural Resources

- The Landmarks Preservation Commission should study individual properties in the area that are worthy of designation prior to the rezoning.
- Our step streets are a valuable resource. We need to make sure that they are safe, accessible to all, supported with capital improvements, and actively maintained.

Task 9: Hazardous Materials

- DCP collaborated with the New York City Mayor's Office of Environmental Remediation (OER) to complete an existing conditions report of area-wide brownfield sites, "Place-Based Community Brownfield Planning Foundation Report on Existing Conditions -Jerome Avenue Corridor" (2015). The report provides an overview of the

study area's geologic and natural features, historical development patterns, zoning, land use and infrastructure, demographic and economic profiles, a summary of environmental conditions and a preliminary evaluation of potential strategic properties.

- The EIS must analyze the information in the study. DCP and DEP should report back to the City Council Member on an on-going basis the status of the cleanup.
- The comments and conditions that were identified by the report must be considered in the scope of this analysis.
- The existing automotive areas must be studied for contamination and identified in the remediation.
- Community Board 4 also identified the Jerome Avenue Area as a priority area in their District Needs Statements from 2013-2016.

Task 10: Water and Sewer Infrastructure

The study area currently contains brownfields and potentially hazardous materials and has not been used for residential purposes. Therefore, the EIS must study the condition of the sewers, pipes and catch basins and stormwater drainage plans, and if necessary provide for the addition or replacement of such materials.

Task 13: Transportation

Traffic

Traffic, transit, and parking are major areas of concern. The study area already suffers from poor transportation conditions. In the draft scope of work, the RWCDs estimates a population increase of 9,500 residents and 2,170 workers. This is a major concern for me. We need to coordinate the Pedestrian Safety Access Plan with the EIS to make sure that pedestrians will be able to navigate streets safely.

- The EIS needs to consider and analyze the major traffic inflows that occur when games are played at Yankee Stadium, just south of the study area.
- The Jerome Avenue corridor already suffers from poor sight lines and traffic congestion, which is exacerbated by the columns of the elevated train. I am concerned about the increase in vehicles and its impact on congestion and safety (car ownership of residents, office workers and retailers, as well as truck traffic to service these buildings, and the cumulative effect when there is a game at Yankee Stadium).
- Getting around Jerome Avenue, whether on foot or in a vehicle is already limited and further exacerbated by automotive repair operators parking on the sidewalks. The police precinct must also work with the community and not park their cars and block traffic.

Transit

- There must be a coordinated effort by NYC DOT and the MTA to ensure that there is sufficient bus service to accommodate the needs of existing and future residents. Additional bus service and routes must be a priority as part of this rezoning. There are already long lines at bus stops, buses are overcrowded, and residents need assurances that they will be able to get to and from work reliably. Further, many area residents work outside the traditional 9-5 hours and need greater access to transit options including bus service in the late evening. The scope of work should include an analysis of the hours of service for existing bus lines and an assessment of where additional buses or routes need to be added to meet the current and projected demand.
- The Jerome Avenue subway stations are already overcrowded during rush hour. Before we bring more people into the area this must be addressed.
- Pedestrian safety is a major concern. Streetscape improvements need to be made to improve the safety and quality of the pedestrian realm. Compliance with traffic regulations (for example, cars parked on sidewalks) need to be addressed through enforcement and street design. We need to ensure that crosswalks are safe, and that signal timing and street lights are in sync with the pedestrian flow. The streets and walkways under the elevated train should feel safe and inviting and be well lit. Streetscape improvement should be made to make the area as aesthetically pleasing as possible.

Parking

The RWCDS projects 993 additional parking spaces to be created. I question whether this is adequate to handle the additional residents and workers. Further analysis and study must be done to make sure that there will be enough parking in the area. The EIS needs to include the need for parking on game days at Yankee Stadium.

Task 17: Public Health

As I have already stated, the health of all Bronx residents and, in particular, those that are affected by the proposed rezoning is of grave concern to me. The health of area residents is below the average for the city, including higher than average rates of asthma, high blood pressure, obesity, and stroke.

Health Care

The environmental review must take into account the total population increase that will tax the existing local health infrastructure. This includes not only the incremental increase of 3,250 housing units and 9,520 residents, but also construction works, and office and retail workers that

will be utilizing the health and hospital network. We must take all of these factors into account to make sure that there are enough health care facilities in the area.

- The EIS must analyze the impact of this substantial population increase on the existing health care facilities and providers.
- The health of residents in this area is already below average for the NYC area. We need to provide state of the art medical facilities and places to educate residents on preventative measures when it comes to healthy eating and exercising.
- The Draft Scope of Work, under the RWCDs projects increase in FRESH supermarkets of 51,562 square feet. This is an increase of only 23,000 square feet under the no-action alternative. The City should assess the need for additional healthy food retail options, and work to increase the incentive to provide quality food for this area.
- The Department of Parks and Recreation should identify a site to be used as a greenmarket for residents to purchase healthy food options at a low price point.

Task 19: Construction

- I am extremely concerned that an interim traffic plan will be in place to handle the construction equipment and additional workers to the area.
- The Scope of Work should include an analysis of the impacts on constructions pollution and possible mitigates. For instance, the study area already suffers from unacceptably high rates of asthma, which could be exacerbated by an increase in particulates. We also need to analyze the HVAC capacity of buildings both within and proximate to the study area with special concern for vulnerable populations including schools, day cares, senior housing, community facilities. If construction noise and debris limits the use of windows, we need to ensure proper ventilation, circulation, and air conditioning, and ensure a safe environment.

Conclusion

The Jerome Avenue Neighborhood rezoning has the potential to transform the Jerome Avenue Corridor for the better and continue our vision of building a thriving and diverse neighborhood. We see this as a pivotal moment in the neighborhood's trajectory. If done right, we have the opportunity to add affordable housing at diverse income ranges, invest in infrastructure and community facilities that will support the comprehensive needs of our neighborhood, increase opportunities for different types of retail establishments, improve our streets to be safer, brighter, cleaner, and more vibrant for cars, bikes, and pedestrians, and address universal access so these improvements can be enjoyed by all people. But the rezoning also brings potential for increased population that will only add to the problems of our already strained infrastructure resources. I look forward to working with the Administration to address the needs of the community in order to make the Jerome Avenue Rezoning a success.

Remarks of Assemblywoman Latoya Joyner
Jerome Avenue Public Hearing Rally: March in Support of Labor
Standards, Affordability and Anti-Displacement – Plaza at West
Burnside and University Avenue @ 5:30 PM

Good evening everyone – I would like to thank you for the opportunity to present remarks regarding the Jerome Avenue rezoning which will cover an area of roughly 73 blocks.

As the state elected representative for the 77th Assembly District, my priorities in this process are to advocate for affordable housing, creating jobs, local hiring, and ensuring that all Bronx families have access to quality education. For those who were born and raised in the Bronx, and have remained here, we must ensure we hear their concerns so that they are able to stay in their homes and in our community. This includes the local businesses, restaurants, and auto workers located in my district.

It is critical to ensure that no family is priced out of their home or is a victim of landlord harassment. We must create long-term employment opportunities for local residents as well as support business development opportunities for our small business owners. It is also important that we limit overcrowding in our great borough and reduce traffic congestion. We must increase the availability of parking, public transportation accessibility and create more green spaces for all community members.

This project will have an impact on generations to come and we must get this decision right. I would like to thank all of the advocates, community residents and our elected officials for voicing your vision of our future today. We can only build a better Bronx through a collaborative effort involving all stakeholders.

JOSÉ M. SERRANO

Senator, 29th District

District Office

1916 Park Avenue, Suite 202
New York, NY 10037
(212) 828-5829
FAX (212) 828-2420

Albany Office

406 Legislative Office Building
Albany, NY 12247
(518) 455-2795
FAX (518) 426-6886

Email:

serrano@nysenate.gov

Website:

serrano.nysenate.gov

**NEW YORK
STATE
SENATE**

ALBANY, NEW YORK 12247



CHAIR, Senate Democratic Conference

RANKING MINORITY MEMBER

Cultural Affairs, Tourism,
Parks and Recreation

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The New York State Black, Puerto Rican,
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Veterans, Homeland Security and Military Affairs

**Testimony of New York State Senator José M. Serrano
Submitted to New York City Planning Regarding the Jerome Ave Neighborhood Study**

As the New York State Senator representing the 29th Senate District, I have the privilege of serving perhaps the greatest socio-economic and culturally diverse district in the state. Neighborhoods in the 29th Senate District include the South and West Bronx, East Harlem, Upper Yorkville, Roosevelt Island and the Upper West Side. With respect to the neighborhoods in the Jerome Ave Rezoning Study, I represent the communities of Highbridge, Mount Eden, Morris Heights and part of Concourse. I am proud to submit the following comments for public review and consideration by New York City Planning.

First and foremost, I believe that any redevelopment within the Jerome Avenue corridor must prioritize the best interests of the residents in the surrounding community where the rezoning will take place. I thank City Planning for their continued efforts to engage the immediate community. As the rezoning process continues to progress, we must ensure that any changes are in line with the needs and wants of local residents and businesses.

Any proposal for redevelopment should take extreme precautions to prevent the displacement of current area residents by preserving housing affordability throughout the corridor. This means we must protect existing tenants from landlord harassment and work to ensure families are not priced out of their homes. In addition, any new housing built as a result of this rezoning must provide affordability representative of the immediate community. It is my hope that such affordability goes beyond the current Mandatory Inclusionary Housing standards which are not the best representation of the needs of this area.

As we have seen all too often, the Bronx is home to some of the worst health disparities in the nation. Many factors contribute to these health disparities and the rezoning process gives us the opportunity to improve upon some of them, including our air quality. As it pertains to housing and development, it is my expectation that developers will be held to high standards to mitigate dust and airborne pollutants like asbestos from entering the surrounding environment during the construction phase. Moreover, developers should be required to utilize green technologies in new developments to help ensure a healthy environment for generations to come.

Improving our existing parks and creating additional green spaces will not only help the neighborhood feel more breathable, but will encourage residents to take part in recreational outdoor activities that are beneficial to their physical and mental health. Creating additional recreational green spaces is also a good opportunity to engage local artists and cultural institutions. Aside from art's ascetic value, it often serves as an important means of representing

and preserving our unique heritage, while strengthening the bonds of our community. Together, green space and art will improve upon the quality of life for the area and help contribute to an even more vibrant community.

Another way to improve upon the air quality in the South Bronx is to remedy the traffic congestion that already plagues the area. I suggest the MTA and Department of Transportation work to add more public transit to the area to meet future transportation demands resulting from the influx of new people who will be living in the area. In turn, this will also allow the area to become safer for pedestrians, cyclists and drivers.

Promoting better neighborhood health by creating access to healthy and affordable food options is yet another important step we must take to reduce the rate of chronic illnesses. When considering an economic development plan for the area, we must encourage current and future businesses to invest in the immediate community by making healthy foods a priority.

It is also my hope that the proposed economic development plan will create long-term employment opportunities for local residents. Such a plan should ensure the creation of living wage paying jobs and seek to support our local minority and women owned small businesses.

Throughout the process, it is imperative that community members are continuously engaged and are aware of any new progress with the Jerome Ave Rezoning proposal as it moves through each remaining step in the public approval process. The proposed Jerome Ave rezoning is a truly special opportunity for residents, community leaders, elected officials, and city agencies to set forth a collective plan that will revitalize the commercial corridors and create access to more housing, jobs, parks, and better schools for the immediate community. My sincere thanks to all my colleagues in government, local advocacy groups, community organizations, and our government agencies for their tireless efforts toward this rezoning endeavor.

Yours in Service,

A handwritten signature in black ink, appearing to read "José M. Serrano". The signature is fluid and cursive, with a long horizontal stroke at the end.

José M. Serrano
New York State Senator
29th Senate District



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
SCOTT M. STRINGER

November 7, 2016

Carl Weisbrod
Director
NYC Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

Dear Director Weisbrod:

Thank you for the opportunity to submit testimony on behalf of the Jerome Avenue Rezoning Proposal, Draft Scope of Work for the Environmental Impact Statement (EIS), CEQR No. 17DCP019X. The proposed rezoning will create a special district for Jerome Avenue that has unique bulk controls around the elevated subway line, introduces new residential uses, and includes Mandatory Inclusionary Housing (MIH).

Scoping hearings are essential for determining a framework that will ensure fair disclosure of potential environmental impacts and identifying appropriate alternative development scenarios for proposed projects. I believe any development in the Jerome Avenue area must balance the City's infrastructure needs with potential impacts on the surrounding community. Since the City's plans were first announced, I have heard numerous concerns from community members including subway accessibility, school overcrowding and local hiring. I echo these concerns; however, for the purposes of this testimony I will focus primarily on the need to study residential and commercial displacement.

The City Charter states that the Comptroller is responsible for advising on and safeguarding the fiscal health of the city, and critical to that mission is advising on rezonings, which can have a profound effect on the affordable housing stock and local industries. Potential zoning changes must be carefully evaluated to ensure that the benefits of economic development do not directly or indirectly displace residents, overwhelm existing infrastructure, or create short-term employment gains at the expense of longer-term employment gains.

Jerome Avenue currently has a mix of infrastructure, commercial and residential uses. Many of these uses are partially insulated from New York City's current real estate pressures by the prevalence of manufacturing and C8 zoning, which does not allow residential uses. The Jerome Avenue Rezoning Proposal would introduce 3,250 new residential units – a significant number which will put pressures on existing uses that did not exist before. Further, the area's relative proximity to mass transit, Claremont Park, Yankee Stadium, and other attractions will position the area for transit oriented development and potentially exacerbate the economic pressures.



Throughout the public dialogue on this rezoning, many proposed mitigations and alternatives will be suggested. However, mitigation and alteration can only occur with an accurate accounting of the potential size and scale of the negative impacts.

As currently proposed, the draft scope of work minimizes the potential impacts on existing residents and businesses and could artificially skew the EIS to not require analysis.

Development Site Analysis

The development site analysis provides the framework by which a site is deemed as either projected (occurring in the near term) or potential (occurring in the longer term) for development. This analysis informs all other impacts. As proposed, the development site analysis does not include “lots containing multi-family (six or more dwelling unit) residential buildings; due to required relocation of tenants in rent-stabilized units.” By excluding sites that are multi-family, the scope will underestimate the potential number of units that could be directly displaced. Given the potential for new economic pressures, these sites should be included in the analysis as they are at risk for tenant harassment, demolition and development.

Further, the scoping document as proposed underestimates the number of residents facing direct displacement due to how it treats potential development sites. Potential development sites will not be included in the study of impacts on residential displacement, only projected development sites will be analyzed for direct displacement. Potential development sites will only be included for study of noise impacts from development, the effects on historic resources, and the possible presence of hazardous materials. The scoping assumes that a study of direct residential displacement will not need to occur because fewer than 500 residents are at risk of displacement.

If potential development sites are included in the direct residential displacement study, then a total of 371 units are at risk of being directly displaced instead of only 106 units. Using a factor of 2.87 residents per unit (the lowest residents per unit found in the three community districts analyzed), the number of residents facing potential displacement are over 1,000 when both potential and projected development sites are included, compared to only 304 with projected development sites only.

By not including potential development sites in the study of possible socio-economic impacts, the EIS will understate and fail to even study its impacts on direct residential displacement. Understanding this potential impact is imperative when considering alternatives and mitigation. As such, the development site analysis should be updated to include both multi-family residential buildings and potential development sites for studying socio-economic impact. This will create a conservative analysis that speaks more fully to the potential impacts.

As potential mitigation, DCP should study establishing clear, enforceable rules prohibiting harassment of existing tenants to reduce the threat of displacement, including but not limited to the “certification of no harassment.” This protection is already in place in other neighborhoods in the city, including Greenpoint/Williamsburg in Brooklyn and Hell’s Kitchen/Clinton in Manhattan, and severely penalizes landlords who have participated in harassment by requiring additional affordable housing to be developed.

Indirect Residential Displacement

According to the scoping documents, 3,250 units will be added to the area due to this rezoning. If 25% of these are affordable per MIH then approximately 813 affordable housing units will be created and 2,437 market rate units will be provided. An indirect analysis will be needed if there is a significant increase in population. As with direct residential displacement, the scoping study may underestimate the total change in population due to its treatment of development sites as noted above. This should be rectified and the scoping document revised to consider the full potential impact.

Moreover, understanding this impact is critically important as the current plan will introduce a significantly different population than is currently entering this community. Per the scoping document, 80% of the housing stock was built prior to 1947. These units are likely to be rent-stabilized. Further, 80% of the new housing units built between 2005 and 2015 were subsidized affordable housing units. MIH, however, will flip that ratio and produce 75% market rate with only 25% affordable.

These new units are likely to introduce a new population significantly different than the existing population. Per the Market and Financial Study of NYC Mandatory Inclusionary Housing, the neighborhoods surrounding the Jerome Avenue Rezoning would be considered “moderate” markets. New low-rise buildings in these markets rent 2-bedroom units for \$2,319. Mid-rise buildings in these markets rent 2-bedroom units for \$2,382. These apartments will be affordable to families earning \$83,484 to \$85,752 (around 100% of AMI for a family of three). This is over three times the median household income of the surrounding neighborhoods.

Given the new population that is being added and the potential impacts, it is imperative that a robust study of both potential and projected development sites be conducted, analyzed, and any impacts mitigated.

In order to reduce any potential impact, the EIS should study alternatives, including but not limited to, creating deeper levels of affordable housing in the MIH program, increasing the total number of affordable housing units required, and preserving more manufacturing space, which would reduce the number of new residents being added.

Direct and Indirect Business Displacement

The effects of ignoring potential development sites follows through to direct and indirect businesses displacement. This potential impact is particularly acute for the auto-related uses that make up the area. Astoundingly, the scoping analysis assumes that 98,002 SF of auto-related uses will be lost as it relies only on projected sites. However, when potential sites are including, this number rises to a staggering 472,969 SF of auto-related uses. This is a fourfold loss of industrial uses beyond what is currently contemplated in the scoping document. These types of industrial uses support both residents and business within the city, while providing stable jobs that do not require advanced degrees.

The potential economic impact of this loss of jobs and businesses deserves to be studied. Further, mitigation and relocation cannot be assumed to occur naturally. Recent articles on Willets Point auto-related uses demonstrate that relocation of auto-related uses is neither easy nor guaranteed to succeed. The Sunrise Cooperative, as noted in a recent New York Times article, is struggling to complete construction despite receiving millions of dollars of relocation assistance from New York City. No such mitigation or relocation assistance is proposed for the auto-related uses at Jerome Avenue.

As with residential displacement, the DEIS should consider both potential and projected development sites when studying the impact of displacing local businesses.

To mitigate the potential impact, the EIS should consider alternatives including, but not limited to, limiting the permitted uses to preserve the existing uses (similar to the Tribeca Special Mixed Use District); limiting the sites that can be converted from manufacturing to residential (similar to zoning restrictions found in the Special Hudson Square District); and increasing the amount of space that will remain zoned for manufacturing.

Conclusion

I look forward to seeing the results of this Environmental Impact Statement and urge that all potential impacts and alternatives be examined carefully and thoroughly. In the meantime, I encourage the Department of City Planning and all relevant agencies to work closely with neighborhood stakeholders to ensure that any future development in this area balances the needs of the community. Thank you again for the opportunity to testify.

Sincerely,



Scott M. Stringer
New York City Comptroller



**TESTIMONY OF ZARIN AHMED BEFORE THE DEPARTMENT OF CITY PLANNING REGARDING DRAFT
SCOPE OF JEROME AVENUE REZONING**

THURSDAY, SEPTEMBER 29, 2016

Thank you for the opportunity to testify today. My name is Zarin Ahmed, and I am the Research and Policy Associate at the Community Development Project at the Urban Justice Center. Our mission is to provide legal, participatory research and policy support to strengthen the work of grassroots and community-based groups in New York City. We are working with coalitions to support equitable development that is beneficial to current residents in areas slated for rezoning.

As the City continues to rezone multiple neighborhoods across New York City in order to build more housing, community members have been working hard to ensure that their priorities are included in their neighborhood's rezoning plans. Residents of Jerome Avenue have embarked on a deeply participatory process that has engaged thousands of neighborhood stakeholders to create a community-based plan to articulate their priorities.

Unfortunately, we have seen too often that the commitments made during rezoning are not kept or enforced. We are deeply concerned about what this means for the Jerome Avenue community and the Bronx as a whole, and hope to work with the City to ensure that the community's priorities are implemented and enforced.

We are calling for a comprehensive and coordinated approach to documenting, monitoring, overseeing and enforcing all public and private commitments made during the rezoning processes. This approach should include a citywide and a neighborhood-based, community-led component and should build off and fill the gaps of the various proposals put forth by the City, including Intro 1132.

While we are encouraged that the City is thinking about the need to record and monitor commitments, we believe that the City can and must do more.

1132 should be a starting point to create a centralized system to oversee, track and enforce commitments made to rezoned neighborhoods; and allow for deep involvement, oversight, and participation from rezoned communities.

We believe that a specific mayoral office is needed to provide overall agency coordination, oversight and accountability for the implementation of commitments made to communities during the rezoning process. We believe that such tasks reach beyond the purview of any one agency or existing Mayoral office and will require a high level of interagency coordination.

We also propose that neighborhood monitoring committees be established to ensure that any commitments made during a rezoning process are implemented, and support community priorities. Community members must be able to continue to participate in the monitoring and decision making

related to the changes in their neighborhood. We propose that funding is made available for operating expenses and staffing for these committees.

We propose that this new Mayoral office work in close coordination with neighborhood monitoring committees to create goals and benchmarks for each rezoned neighborhood, based on the community's stated priorities and commitments made in the zoning plan. The office should then conduct ongoing assessments for each rezoned neighborhood to track progress towards goals and benchmarks. The office could also track the funding status for all commitments made during the rezoning process and ensure projects are completed on a clear timeline, and, in consultation with neighborhood monitoring committees.

Thank you.



Richard Bass, AICP, PP
Senior Planning and Development
Consultant

Akerman LLP
666 Fifth Avenue
20th Floor
New York, NY 10103
Tel: 212.880.3800
Fax: 212.880.8965

Dir: 212.259.6406
Dir Fax: 212.90506491
richard.bass@akerman.com

November 4, 2016

Carl Weisbrod
Chairman
NYC City Planning Commission
22 Reade Street
New York, NY 10007-1216

RE: Scoping Comments for Jerome Avenue Rezoning Proposal

Dear Chairman Weisbrod:

Akerman LLP ("Akerman") represents the owner of Block 2872 Lots 170, 179 and 182, (1441, 1445 and 1455 Cromwell Avenue), Bronx. Please see attached tax map (collectively, the "Site"). The Owner has directed Akerman to submit the following comments.

The Owner, who has owned the Site for over 18 years, is fully supportive of the City's rezoning effort as articulated in the Jerome Avenue Neighborhood Planning Study and the Draft Scope of Work for an Environmental Impact Statement for the Jerome Avenue Rezoning (the "Rezoning"). However, we believe there is a planning rationale to map R8A for the nine (9) tax lots on Cromwell Avenue that are currently proposed to remain mapped as C8-3.

The Owner has entered into discussions with Bronx Pro Real Estate Management to redevelop the Site as affordable housing. The Site's current uses include: the office for an electrostatic spray painting company, in business since 1938, that can easily relocate their office use elsewhere in the Bronx; and a shipping company, primarily to the Dominican Republic, which can also easily relocate. Uses for the other six (6) tax lots include: public parking; auto service; and storage; the 2-family house currently operates as a boarding house contrary to its grandfathered permitted use.

Retention of the C8-3 zoning district creates a non-residential hole in the existing and proposed residential zoning donut (see attached map). North and west of the Site are existing residential buildings; the Rezoning proposes new residential development south and east of Site. Retention

akerman.com

November 4, 2016

Page 2

of the existing C8-3 uses will force existing and future Cromwell Avenue residents to pass non-residential uses as they walk between their homes and mass transit/local shopping. Such non-residential uses are closed at night, creating a dark, non-active urban environment; during the day, these uses contain driveways that cross pedestrian sidewalks, and sometimes these uses operate on those sidewalks (as referenced on page 15 of the Draft Scoping document).

Mapping this nine (9) tax lot C8-3 zoning district to MIH R8A would create approximately 738 additional residential units, of which 184 units (assuming 25%) would be available to families making 60% average AMI. The Site, in conjunction with Bronx Pro Real Estate Management, would generate approximately 181 affordable units (assuming 100% affordability). The mapping of the R8A would facilitate the development of vibrant residential buildings that promote the continuity and consistent streetscape that currently exists on sections of Cromwell Avenue or is envisioned in the Rezoning.

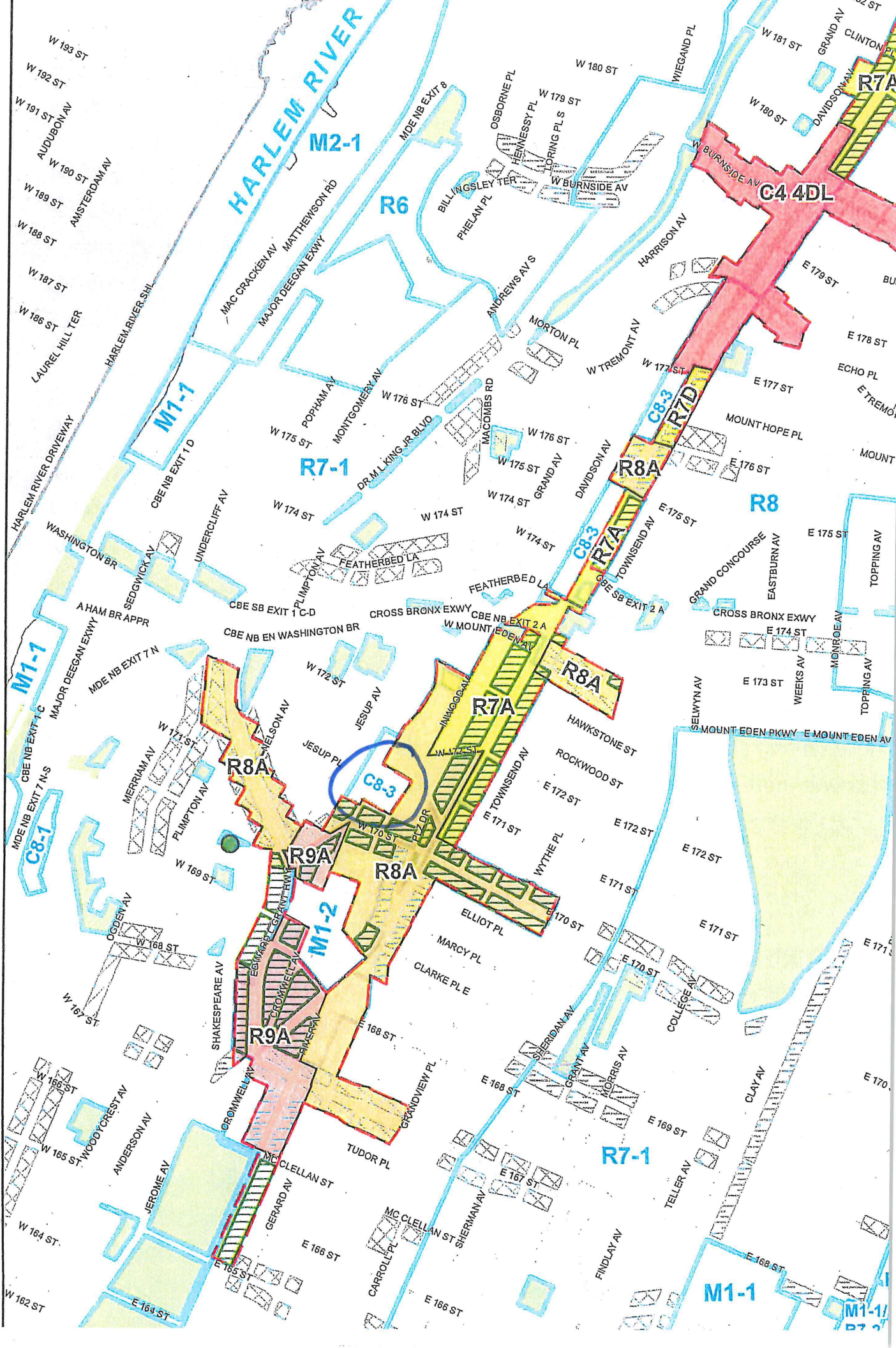
The Owner is committed to work with the City and the host community so that the mapping of R8A for this small section of Cromwell Avenue will be a significant step in accomplishing the City's and community's vision.

Sincerely,



Richard Bass, AICP, PP
Senior Planning and Development Consultant

cc: Carol Samol, DCP
Michael Parkinson, DCP



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NYC Digital Tax Map

Effective Date: 01-03-2012 15:24:59
End Date: Current
Bronx Block: 2872



- Legend**
- Streets
 - Miscellaneous Text
 - Possession Hooks
 - Boundary Lines
 - Lot Face Possession Hooks
 - Regular
 - Underwater
 - Tax Lot Polygon
 - Condo Number
 - Tax Block Polygon



Testimony Frank Bell
Topic Jerome Avenue Neighborhood Planning Study Environmental Scoping Hearing
Date Thursday, September 29, 2016

Good evening, my name is Frank Bell and I'm a proud Bronx resident and member of Laborers Local 79. I want to start by thanking the Department of City Planning for the opportunity to testify today and voice my concerns regarding the City's proposed rezoning of Jerome Avenue.

I was born in the South Bronx and now reside at 180th Street and Tremont Avenue, directly in the area the City is looking to rezone. My 10-year-old daughter and I will be affected by this rezoning and the changes it will bring to our neighborhood.

This is personal to me.

As a lifelong Bronx resident, I have seen first-hand the underinvestment in the borough, the joblessness, the struggle to make ends meet for so many of my neighbors and family members. We need more affordable housing, middle class job opportunities, better schools, and the list goes on, but we need these things done in a way that respects the existing community and includes input from neighborhood residents.

What makes this rezoning even more personal to me is my work as a Journeyman with Laborers Local 79. The rezoning of 73 blocks of Jerome Avenue is a large undertaking that will require a large workforce of highly skilled and trained construction professionals. Yet, there are no safety or training standards for workers included in the scoping report or plan to rezone the area.

As the City prepares to build over 3,000 units of affordable housing along Jerome Avenue, how can they ensure the workers on these projects are safe? Just this past year, 17 construction workers lost their lives on jobs throughout New York City. 90% of those deaths occurred on non-union projects where contractors weren't held to any safety or training standards for their workers. With construction fatalities on the rise, the City has a responsibility to protect workers and the Jerome Avenue community.

I used to work in non-union construction and not only was my pay substandard, but so was my protection on the job. My non-union employers only cared about getting the job done, there were no safety precautions, no training for workers. My life and the lives of my coworkers were of no concern to these contractors, we were dispensable. I fear these are the types of contractors that will be working along Jerome Avenue if the City continues to ignore the health and safety risks of construction and the rezoning goes through without any safety or training standards.

I want to see my neighborhood thrive and grow but not if it isn't done in a safe manner that takes into account the needs of Jerome Avenue residents. I want my neighbors to have an opportunity like I do in the union to earn a middle class wage with proper job training, health and retirement benefits. And the City has the opportunity to do just that with this rezoning. If properly crafted, the Jerome Avenue rezoning can uplift residents and bring good, middle class jobs to the area while providing much needed housing. But as it currently stands, the scoping leaves many of these questions unanswered when it comes to worker safety and career path jobs for local

residents in the rezoning. If these, and other community concerns like anti-displacement and deeper affordability, are not met, I and my union brothers and sisters will rise in strong opposition to the Jerome Avenue rezoning.

I urge City Planning to re-examine the scope of the Jerome Avenue rezoning and to not certify this project until ALL social impacts have been studied to ensure this historic change to OUR neighborhoods reflects OUR needs.

Thank you.

From: [Jerome Avenue Study \(DCP\)](#)
To: [Evren Ulker-Kacar \(DCP\)](#); [Annabelle Meunier \(DCP\)](#)
Subject: FW: Linda Seward Comments Regarding Jerome Avenue Rezoning
Date: Wednesday, October 05, 2016 4:01:45 PM

From: Hal Bergold [mailto:h.bergold@newsettlement.org]
Sent: Tuesday, October 04, 2016 3:54 PM
To: Jerome Avenue Study (DCP) <JeromeAvenue@planning.nyc.gov>
Cc: Sheila Garcia <s.garcia@newsettlement.org>
Subject: Linda Seward Comments Regarding Jerome Avenue Rezoning

To Jerome Ave Planning Board,

I Live in the Jerome Ave area and reside in the 10453 zip code. I have a couple of concerns about the rezoning of Jerome Ave.

1. The post office for the area is 2024 Jerome Ave. For the last couple of years, the post office has been very crowded. I have waited on line to get in, I have gone early before the post office has opened and there is a line already there. This office is crowded 6 days a week. I have waited on line for service anywhere between 40 minutes to 2 hours and 10 minutes. The reason is there has been numerous new buildings that have come up in the area already and with 12,000 more new residents in the are we need a larger Post Office.
2. With the developers getting subsidies I hope they will not be allowed to turn the rent stabilized apartments into shelter apartments like they have in the past. The apartments under the Jerome Ave Plan should be built, remain affordable and rent stabilized. The apartment should be kept that way and not used as shelter apartments. Permanent housing should be the goal not temporary housing.

Thank you very much

Linda Seward
Grand Concourse
CASA Member

Hal Bergold

Community Organizer

CASA: Community Action for Safe Apartments

New Settlement Apartments

35 Marcy Place

Bronx, NY 10452

718-716-8000, ext. 235

[@CASABronx](http://www.casapower.org)

Support our work! Donate here: www.razoo.com/casagala2016

Testimony of The Legal Aid Society

At the Jerome Avenue Neighborhood Planning Study Environmental Scoping Meeting
Bronx Community College (Gould Memorial Library Auditorium, 2155 University Avenue)
September 29, 2016 (4:00 p.m. – 12:00 a.m.)

Delivered by: Athena Bernkopf, Paralegal Case Handler
Written by: Athena Bernkopf & Jessica Bellinder, Supervising Attorney
The Legal Aid Society Tenant Rights Coalition
391 E. 149th Street, 6th Floor, Bronx, NY 10455

This testimony is submitted on behalf of The Legal Aid Society. The Society is the oldest and largest program in the nation providing direct legal services to low-income families and individuals. The mission of the Society's Civil Practice is to improve the lives of low-income New Yorkers by providing legal representation to vulnerable families and individuals to assist them in obtaining and maintaining the basic necessities of life — housing, health care, food and subsistence-level income or self-sufficiency. The Society's legal assistance focuses on enhancing individual, family and community stability by resolving a full range of legal problems in the areas of housing and public benefits, foreclosure prevention, immigration, domestic violence and family law, employment, elder law, tax law, community economic development, health law and consumer law

The Tenant Rights Coalition is a citywide unit providing housing legal assistance and representation through a combination of eviction defense, affirmative litigation, and advocacy designed to stabilize housing conditions and prevent the harassment and displacement of low-income tenants. The Coalition emphasizes group and building-wide assistance while also providing individual tenant assistance. The Coalition provides outreach in high-risk zip codes in all five boroughs of the City, has a live-answer helpline for affected neighborhoods, and works directly with community organizers. The Bronx practice operates specifically within the zip codes 10452 and 10453, much of which may be subject to the proposed zoning. Our work with tenants in these areas has provided insight into the experience of current tenants and how they may be impacted by the rezoning. We offer this testimony in support of the communities that we work with.

1) Targeted Rezoning Areas Accelerate the Gentrification Pressure on Low-income & Working Class New Yorkers of Color:

We are concerned that the neighborhoods chosen throughout the city for rezoning, including the Jerome Ave. corridor, are in or adjacent to low income and working class communities of color. In choosing these neighborhoods, the City is accelerating the gentrification of some of the last affordable neighborhoods with access to public transportation. Community residents will have nowhere affordable to go in the City if they are pushed out of their current neighborhoods. If the City hopes to create truly diverse, mixed-income communities, it must look at rezoning low density, middle-high

income neighborhoods in addition to considering whether to rezone Jerome Avenue. Rezoning in higher income neighborhoods would create more mixed income, higher density residential development in neighborhoods that are likely to attract new residents and will expand the housing options for New Yorkers who are seeking affordable housing. By expanding the housing options in higher income neighborhoods will relieve some of the inevitable gentrification pressures that the South Bronx and similar areas will face in the rezoning process.

2) Insufficient Community Participation in the Rezoning Process:

In the past year, the Tenant Rights Coalition has engaged in a series of outreach activities in the Bronx communities where we work in order to better understand the experiences of tenants in the area. These activities have ranged from street and building outreach to connecting with schools and community-based organization. Our outreach in the community has shown that despite the efforts of many community members and groups, as well as the City's own outreach efforts, many tenants in the surrounding neighborhoods do not know about the rezoning process or the impact it will have on their community and their lives.

We are concerned that the City's rezoning recommendations have not taken into account community generated suggestions and concerns as identified through the CDP's own Jerome Avenue Study – Workshop and Visioning Session and the community based Bronx Coalition for Community Visioning process. Greater effort needs to be made to actively and meaningfully include community members in the planning process and incorporate their concerns and suggestions into the final plan for their community.

3) Importance of Studying Direct and Secondary Residential Displacement:

Direct Residential Displacement:

The draft scope indicates that there is no need to study the direct displacement of residential tenants in the rezoning area. We disagree. While the scope anticipates that fewer than 500 residential tenants are to be displaced, we note that the scope does not detail how the residential tenant census was conducted in the rezoning area. Due to the lack of detail in the scope, it is impossible to verify the accuracy of this estimate. It is of grave concern that the projected displacement number is too low and that the direct displacement will actually be much greater than estimated.

The residential (and commercial) tenants in the rezoning area all earn low incomes. These tenants will find it particularly hard to absorb the cost and consequences of displacement. They will find it incredibly difficult, if not impossible to find other places to live in the New York City area that they can afford. We urge you to study the impact of direct displacement on the tenants in the area to be rezoned to ensure that you have an accurate and complete picture of how rezoning will affect the community. Any study of displacement must also identify measures to prevent displacement and support those community members who are in immediate danger of losing their homes and livelihoods.

Secondary Residential Displacement:

The Legal Aid Society emphasizes the need to do a thorough study of the impact of secondary residential displacement on the low income and working class residents of the community. Previous research on inclusionary zoning regulations implemented in New York City indicates that minimal below market-rate housing has been built as a result, and much of it has been distinctly unaffordable to people in the income ranges found in the neighborhoods around Jerome Avenue . Consequently, all or most of the affordable housing planned for development in the rezoned area is not expected to be affordable for families earning the median income or less for this neighborhood.

It is dangerous to assume, as the scope does, that the existence of a high percentage of rent stabilized tenancies in the surrounding neighborhoods will prevent displacement and gentrification. In our work we have seen landlords use many ways to or push rent regulated or low rent tenants out of their apartments, including but not limited to raising the rents to unaffordable amounts. For example:

i. Major Capital Improvements MCIs – We have seen landlords in the Bronx use MCIs as a way to raise the rent in every building that the landlord owns. Shortly after buying the building, the landlord begins work on a major building system like the plumbing, gas or electrical systems but also begins renovating all of the kitchens and bathrooms in the building. The tenants often have to live for months at a time without essential services and are asked to share unsecured and unsanitary common bathrooms with their neighbors while work is being done in their apartments. The landlord does not inform the tenants that he plans to apply for an MCI rent increase for all of these changes and that it will substantially increase their rent if approved. We have seen increases of \$70.00 per room, which in a two bedroom apartment can mean an increase in the legal rent of \$350.00 per month. While the rent increase is phased in over time, it is a permanent increase and can still be a huge jump in the rent for tenants who are just making ends meet. Most of the tenants if given a choice would prefer an affordable apartment that is clean and habitable than an apartment with a new kitchen and bathroom they can't afford. The combination of the inconvenience of living through the construction, and the rent increases serves to drive out tenants who have otherwise no reason to give up their rent stabilized apartments.

ii. Individual Apartment Increases IAIs- This is another area that is ripe for abuse. When tenants complain that their appliances or apartment doors don't work, instead of giving the tenants a working appliance, we have seen landlords try to get tenants to sign authorizations for IAIs to replace the defective appliance with a new one when the landlord is obligated to repair or provide a working appliance. We have also seen tenants who have remarkable jumps in their rent from the rent paid by the prior tenant. When questioned, landlords justify the increase by claiming that substantial work was done in the apartment. Often the tenants dispute that the work was actually done. In other situations the work may have been done but was unnecessary or it was done solely for the purpose of removing an apartment from stabilization. IAIs provide landlords who are willing to spend some money on "upgrading" apartments a golden opportunity to

move their apartments out of rent regulation. This gives landlords a particular incentive to evict tenants or make it so existing tenants don't want to renew their leases.

iii. Deprivation of Services – Among the many tools that landlords have to “encourage” tenants to leave their rent regulated apartments is the deprivation of services including gas, heat, hot water, electricity, elevator, exterminator, janitorial and garbage removal. We find tenants across the rezoning area and the surrounding neighborhoods who are exposed to poor housing conditions that affect the health and comfort of their families. Many of our clients work hard and pay their rent every month only to come home to falling ceilings, persistent leaks and myriad other conditions that are unresolved for prolonged periods of time. These conditions not only cause the tenants stress and discomfort but they serve to push tenants out of affordable apartments due to the frustration and despair tenants feel about ever getting their apartments to a habitable condition.

iv. Repeated aggressive litigation – Another tool that landlords with rent regulated tenants use to try to empty their apartments is repeated aggressive litigation for small amounts of unpaid rent, fees that can't be the basis of an eviction case, or baseless alleged nuisances. Any eviction proceeding, no matter how baseless, exposes tenants to the risk of eviction. For tenants who are unrepresented, one missed court date can lead to the issuance of a default judgment and a warrant of eviction.

v. Illegal Application of the Rent Law & Regulations – Another strategy that we have seen landlords employ is the illegal removal of apartments from rent regulation and failure to register apartments as stabilized even though the apartment or building is subject to an agreement with a government entity that requires the apartment be rent stabilized.

All of the strategies above represent forms of tenant harassment, but sometimes, the harassment is blunter. Many tenants complain that their landlords have threatened to call governmental agencies like Immigration and Customs Enforcement or the Administration for Children Services if they attempt to organize or exert their rights as tenants. We also see landlords and their agents target tenants by being verbally and physically aggressive.

Based on these experiences we cannot emphasize strongly enough that the City cannot be complacent about the protections of Rent Regulation. Our work under the Anti-Displacement and Anti-Harassment funding from HRA is a step in the right direction to protect tenants from the destabilizing efforts of landlords, but a thorough study of the impact of these tactics must be included in any accurate measure of the impact of rezoning on the community.

Furthermore, the scope anticipates the influx of thousands of new residents and households into the area, the majority of whom will earn incomes above those of current community members. This influx will inevitably increase rents in the surrounding area and push out current residents. With this expectation, it is critical to study the change in

race, income, and other demographics that may occur as a result of the rezoning process and use this information to plan effectively against displacement and the gentrification of one of the last affordable areas in New York City. This must simultaneously occur with the study and preparation of anti-displacement and anti-gentrification measures.

The CDP's own Jerome Avenue community visioning summary and the Bronx Coalition for Community Vision identify the community desire and need for housing for people with low and extremely low incomes. The need for deeply affordable housing has come up again and again when we speak with community members. The rezoning plans as they have been developed by the City in recent years have not addressed this need and the Bronx draft scope appears to be continuing that trend.

4) Health Implications of Rezoning:

The Bronx has some of the worst environmental and health conditions in the City, including very high asthma rates and high indices of poorly maintained homes. In assessing the impact of the rezoning on the surrounding community, the City must look closely at what the impact will be to the health of current residents of the construction, clean up and remediation of land that has been used for auto and industrial purposes, as well as proximity of new housing to the elevated train tracks.

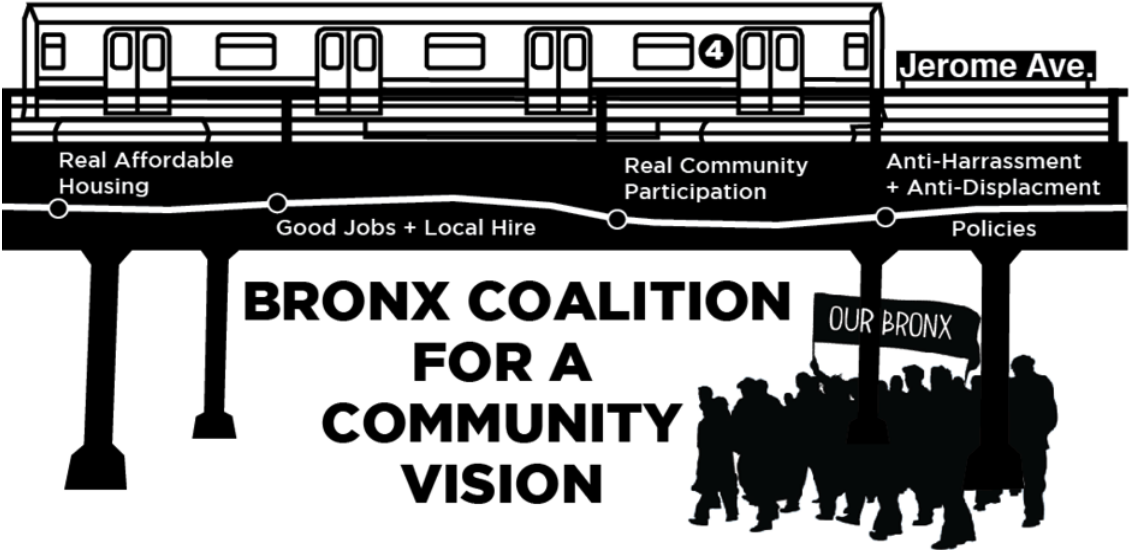
As a final matter, we are concerned that the Scoping Hearing today did not provide adequate opportunity for community members to engage City officials in conversation about their hopes and concerns for the implementation of a rezoning plan. The Draft Scope itself relies significantly on technical elements of the rezoning process, to the exclusion of concerns for the ongoing quality of conditions in the housing, employment, educational, and environmental domains. These concerns are integral to the livelihood and wellbeing of community members who make up the vibrant communities the South and Northwest Bronx today. We urge the City to deepen its engagement with community members to ensure that their concerns are prioritized and addressed. Any rezoning process that moves forward without meaningful integration of community-generated visions and suggestions will only serve to dismantle these communities. We are hopeful that the rezoning process will be planned and implemented intentionally to promote inclusive and equitable communities.

References and Resources:

- <http://www.city-data.com/zipcodes/10452.html>
- <http://www.city-data.com/zipcodes/10453.html>
- <http://www.anhd.org/wp-content/uploads/2011/07/ANHD-Mandatory-Inclusionary-Zoning-4-2014.pdf>
- <http://www1.nyc.gov/assets/doh/downloads/pdf/data/2015chp-bx4.pdf>
- <http://www.metropolitiques.eu/To-Prevent-Worsening-Inequality.html>
- https://www1.nyc.gov/assets/planning/download/pdf/plans-studies/jerome-ave/visioning_summary.pdf

https://cdp.urbanjustice.org/sites/default/files/CDP.WEB.doc_Report_BXCmtyVision_20151021.pdf

Comments on the Draft Scope of Work for the Jerome Avenue Rezoning



Submitted November 7, 2016

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I. Introduction

The city's plan to rezone 73 blocks along Jerome Avenue in the Southwest and Northwest Bronx is the largest proposed land change in the Bronx since Co-Op City in 1973. It will change the use of land to facilitate the displacement of the manufacturing, auto and industrial spaces and to facilitate the construction of more than 4,000 privately owned residential apartments, providing housing for more than 12,000 people.

But who will the housing be for? Who will build the housing? How will this impact the displacement pressures on the mostly rent-stabilized tenants who live in the surrounding blocks? And how will this impact the immigrant, Dominican auto industry?

The City's Plans Must Reflect the Community's Goals

Formed in early 2015 in response to the City's proposed plans to rezone Jerome Avenue, the Bronx Coalition for a Community Vision is grounded in the belief that community members are the experts on the issues that most affect their lives. Beginning in March 2015, the Coalition has hosted numerous meetings to educate community members about the City's plans, engage residents in conversations about current needs and challenges the community faces, develop policy solutions based in our shared experiences, and prioritize and advocate for these proposals. We have engaged thousands of community members through forums, visioning sessions, campaign meetings, phone calls, surveys, and more, and have collectively developed four main principles and corresponding policy priorities:

- Anti-displacement strategies for current residential and commercial tenants. Current tenants and small business owners will not benefit from the rezoning if the rezoning increases rents, speculation, and the forces of displacement. The City should take steps to ensure that the people and businesses that are here now are protected and are able to stay.
- Real affordable housing. All of the new housing built in the community should be at rent levels that reflect the need in the community.
- Good jobs & local hire. New construction and businesses will mean a lot of new jobs in the area and the City should guarantee that those jobs create career opportunities for local residents. Also, developers should not be allowed to build unless they commit to using contractors that are part of State Department of Labor Registered and Approved Apprenticeship programs. The City must mandate provisions for worker safety and training to ensure our most vulnerable workers are protected.
- Real community engagement. Residents need to have a say over what happens in the community, and the City should have long-term tools to ensure accountability for implementing commitments made during rezoning approval process, including a role for community in

overseeing progress. The community needs this to ensure that the rezoning is actually part of a community plan that is effective and fully implemented.

If the City takes these community goals to heart and adopts the policy proposals and practices that residents have developed over the course of almost two years, we believe that it will be possible for the Jerome Avenue rezoning to serve as an important example of responsible, equitable development. As the first rezoning in the Bronx under the de Blasio administration, this rezoning will set the stage for all future rezonings in the Bronx, and we feel strongly that the de Blasio administration must seize this opportunity to rewrite the story of disinvestment and displacement that has dominated the South Bronx for too long.

But after careful review of the Draft Scope of Work, we are gravely concerned that the City is on the wrong track already. Almost two hundred community members testified at the hearing on the Draft Scope of Work on September 29, 2016, and of those, only a tiny handful spoke in favor of the City's plans. Instead, many community residents expressed outrage at the City's seeming dismissal of the concerns and policy proposals the community has spent almost two years developing; fear at the thought that they may be displaced from the neighborhoods they either grew up in, or adopted as new homes after being displaced from other New York City neighborhoods; anger at a process that arbitrarily turns a blind eye from serious real-world problems, including the illegal displacement tactics many tenants are fighting every day; and determination to fight the City's plans if they are not written to reflect what residents need.

The Need for Real Community Engagement

The Draft Scope of Work significantly misrepresents the extent to which the Department of City Planning has engaged community members and formulated a plan consistent with the community's demands. For instance, this spring, the Coalition sent the Department of City Planning a detailed document that set forth the zoning text provisions we felt were critical for this rezoning - provisions that would help create deeply affordable housing, protect existing small businesses and auto workers, and ensure adequate space for community facilities, among other community goals. Yet DCP has failed to include any of our suggestions in the plan as described in the Draft Scope of Work. This does not seem like meaningful engagement to us.

As another example, in the Draft Scope, the City states that :

The [Jerome Avenue Neighborhood] Study takes a broad look at the needs of the community and through a community outreach process has developed a vision for the study area which has resulted in the Jerome Avenue Neighborhood Plan ('the Plan'). The Plan provides a number of strategies to spur affordable housing, economic development, improve health and quality of life, investment in the public realm, in addition to proposed land use actions that accommodate the need for high quality affordable and retail uses.¹

But the community has yet to see the Plan to which DCP refers, and it is unclear at this point what this plan is or where, if anywhere, it can be accessed by the public. The text makes it appear as though the Plan has been completed, even though our conversations with DCP, our presence at planning meetings convened

1 Draft Scope of Work, p.1.

by DCP, and an exploration of the DCP website all indicate that only preliminary activities related to the creation of what will be called the JANP have taken place and that there is no Plan that can be properly considered at this time.

On page 15, lofty goals are stated and their achievement is attributed to the “direct result” of a Plan that is not yet completed. These claims are unexplained and unsubstantiated – *how will JANP protect existing tenants and preserve affordability? How will small businesses be supported? How will the so-called direct results of the JANP be measured? How will these results be compared or weighed against the direct results of the proposed actions? Has DCP already completed the Plan? Will community members have an opportunity to meaningfully weigh in on whatever Plan DCP ultimately puts forth? Critically, will the community have an opportunity to review the Plan before the next stage of environmental review proceeds, or will we be forced to provide feedback on the basis of a Plan we have never seen?*

Further obscuring the public’s ability to evaluate what will be in the “Plan” and what is specifically linked to this land use action, there are a number of unclear or uncited statements in the Draft Scope. On page 16, greater detail describing the range of government regulation of housing should be provided, as should detail about the levels of affordability that were achieved for the 8500 preserved units, and the programs that were used to accomplish this. Recent housing and other development should be mapped, and the unsubsidized construction of housing that is referenced on page 16 should be labeled alongside the HPD-financed construction and location of HPD preserved units. Page 17 makes a reference to proposed infrastructure investments that the proposed zoning will leverage. These should be named to allow for the public to evaluate the status of these investments.

In addition to clarifying the misleading language about the status of a completed plan, the process section should include the dates of the events referenced on page 5 - the Open Houses, Community Workshops and the Visioning Session - as well as the number of attendees of these sessions and who they represented. The involvement of Community Board 7 is not described – it is unclear in what way, if any, they were engaged in the process. This section should also include information about alternative ways that community stakeholders have been planning for the neighborhood and how those processes relate and how input for those processes has been considered (or rejected).

Finally, in the listing of the goals of the engagement process, it is unclear how decisions were made to prioritize or balance among competing goals. Certainly, there has been no clear, collective process that carried this out. The decision-making process should be made explicit, since it is the underpinning of the proposed action and eventual plan.

In the sections below, we outline our specific concerns about the Draft Scope of Work and the City’s plans for the Jerome Avenue rezoning as they currently stand. We demand that the Department of City Planning engage in the rigorous analysis necessary to determine the real consequences of the proposed rezoning, and consider our policy proposals as mitigation strategies for the significant detrimental impacts that are otherwise certain to come.

The Reasonable Worst-Case Development Scenario (RWCDs) Must Be Adjusted

The RWCDs distinguishes where DCP believes that development will happen (projected sites) from where DCP believes development may happen (potential sites). In the aggregate, whether a site is classified as projected or potential has major bearing on the impacts analyzed and mitigated as part of the environmental review – especially with regard to direct and indirect residential and business displacement. Performing this analysis incorrectly calls into question the entire rest of the document.

Problems with estimating where there will be new development

We believe that the proposed analysis for projected development will lead to an incorrect undercount of impacts, and that the methodology for projecting development should be adjusted in the final Scope. Overall, we believe that projected development is underestimated and that the methodology described in the draft Scope incorrectly categorizes projected sites as potential ones, because of flaws in the criteria and failure to take into account site by site conditions.

First, the draft Scope lists the size threshold for considering where new development will take place at 5,000 feet. Applying this threshold across the entire area without examining local site conditions is too generalized an approach which may inappropriately exclude likely development. In particular, in the areas zoned R9 where Cromwell meets Jerome and on the smaller sites rezoned to R8A on 183rd Street, east of Jerome, it is likely that smaller sites will be developed.

In addition to initial criteria that is too restrictive, the draft Scope goes on to detail further exclusions from within the initial criteria. Several of these exclusions are problematic.

First, the draft Scope assumes that no multi-family residential building in the rezoning area will be redeveloped. This is based on the assumption that the required relocation of rent-stabilized tenants would preclude development, regardless of the incentive to build. Yet this assumption is unlikely to hold true. Harassment of rent stabilized tenants in and around the rezoning area is well-documented, making it obvious that landlord actions to empty a building of rent-stabilized tenants by illegal means is entirely a possibility. Furthermore, the greater the degree of underutilized FAR, the greater economic incentive to redevelop. Currently, 30 residential properties in the rezoning area are significantly underbuilt (with at least 2.5 FAR available for development)² and the proposed action would only increase the potential to build, suggesting that an “across the board” exclusion of existing residential properties - regardless of particular characteristics and vulnerabilities - is insufficient.

Additional screening items that exclude sites from the projected category have great potential to result in an overly conservative projection. For example, lots “upon which the majority of the floor area is occupied by active businesses” were considered to be potential - instead of projected - sites. But being an active business is no actual protection for tenant businesses in properties that have sky-rocketed in value. Nothing in this criterion speaks to the extent of the economic incentive that a landlord would have to displace active businesses; it only speaks to the potential disincentive to the landlord caused by the

2 Analysis by Municipal Arts Society, accessible at file:///C:/Users/econte/Downloads/testimony-2016-10-10-dcp%20(2).pdf

hassle of ending leases and evicting multiple businesses. When the economic incentive to displace is great enough, landlords are not deterred by active uses on site.

Similarly, being a “unique” or “valuable” business is no protection against the actions of a landlord if a business rents its space, like the overwhelming majority of businesses in the area do.

With incorrect projections for development, the analysis for direct displacement of residents, businesses, and workers will be incorrect, as will the analyses for indirect displacement. An under-projection can also prevent the thresholds for more detailed analyses from being met. At a minimum, DCP should remove the criteria in bullets 1 and 5 on page 25 for differentiating between projected and potential sites, should evaluate residential properties on a site by site basis to determine the likelihood of redevelopment, and should remove the 5,000 ft screen when projecting development in the areas mentioned above.

Problems with population projections

We find that the multipliers used to estimate the projected population increase caused by the rezoning to be inappropriate for this piece of analysis. DCP’s methodology as stated in the DSOW is to use the average household size for the community district of the three districts intersected by the rezoning as a multiplier against the number of projected dwelling units in these individual community districts. This is problematic as the household size within the rezoning area is likely to be reflective of a far different density and fabric than the broader community district. Further, some these community districts barely intersect with the study area at all (CD 7 has only 3 projected sites within its boundaries) which makes their use even less relevant.

Since data is readily available at a much more granular level that would provide a far more accurate picture of average household size in the rezoning area we ask that DCP update its methodology to use the average household size of the 78 census tracts used in DCP’s initial neighborhood profile as the multiplier for all projected sites across the study area. The neighborhood profile identifies an average household size of 3.01³ for renter occupied units which we feel is more accurate than the numbers used in the individual community districts - yet still may not reflect the reality of larger household sizes in the study area.

II. Land Use, Zoning, and Public Policy

This rezoning is massive. It affects more than 300 businesses and thousands of rent stabilized tenants, and it will drastically shape the history of the Bronx.

As part of its analysis of Land Use, Zoning and Public Policy, the City will describe public policies applicable to the study area, and the extent of the Proposed Actions' consistency with such policies. One major policy that will be analyzed is Housing New York, "a five-borough, ten-year strategy to build and preserve affordable housing throughout New York City ... to foster a more equitable and livable New York City." The plan's five guiding policies and principles include both "building new affordable housing for all New Yorkers" and "preserving the affordability and quality of the existing stock."

The Proposed Actions Will Not Advance Housing New York's Goal of "Building New Affordable Housing for All New Yorkers" Unless the Coalition's Term Sheet is Adopted

The City says that without a rezoning, the market would create 780 new apartments over the next 10 years. The rezoning will add 3,250 apartments to that number, across 146 different development sites. In total, the rezoning will determine the nature of the more than 4,000 residential units over the next 10 years. This is an incredibly bold government action.

The plan repeatedly says that the City's aim is to create permanently affordable housing. The City says it will do this through Mandatory Inclusionary Housing (MIH) and city and state financing programs for affordable housing. Unfortunately neither of these options create a significant number of units that match the neighborhood need.

City officials have touted MIH as a vehicle to create deeply affordable housing. But the Area Median Income (AMI) for CB4 is \$27,000 and \$21,000 for CB5, and no Option in MIH reflects neighborhood needs—the best Option leaves out the 78% of neighborhood residents who make less than \$50,000 a year. None of the MIH options require any developers, anywhere to build more than 10% of new apartments at or below 40% AMI – even though almost two thirds of families in Community Boards 4 and 5 earn less than \$35,000 a year. MIH also does not require developers to build any housing at all for households who make less than 30% AMI, or \$25,000 a year – even though almost half of families in Community Boards 4 and 5 (45%) are at these low income levels.

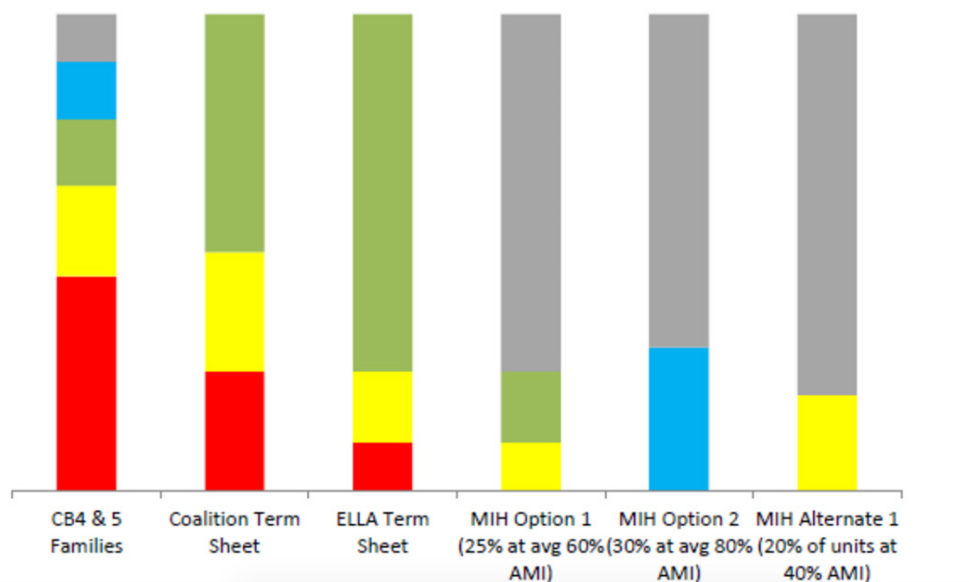
The city's best financing program, ELLA, is also wholly inadequate as most of the housing it subsidizes are for families making \$52,000 a year. Under ELLA, only a quarter of the roughly 4000 apartments the rezoning will bring to the neighborhood would be affordable to families making \$35,000 a year or less. The city therefore has no mechanism to mandate deeply affordable housing or leverage the market to create it,

at levels that reflect the needs of neighborhood residents. The stated goals of the rezoning are therefore either entirely false or entirely for another population.

It is not simply that the housing built above rent levels affordable to current residents will fail to meet the existing neighborhood needs - it may in fact make matters worse, increasing instability and homelessness. As a recent report by the Institute for Children, Poverty and Homelessness concluded of Concourse/Highbridge, one of the areas impacted by the proposed rezoning, “The neighborhood faces significant gaps in affordability for its poorest residents, and development that does not address these gaps could further destabilize the community and place thousands more children and families at risk for homelessness. Ensuring that development includes accessible rental units for all income brackets and addressing residents’ needs beyond housing, such as child care, education, and workforce development, are crucial to bring stability to a neighborhood that has long struggled with family homelessness.”⁴

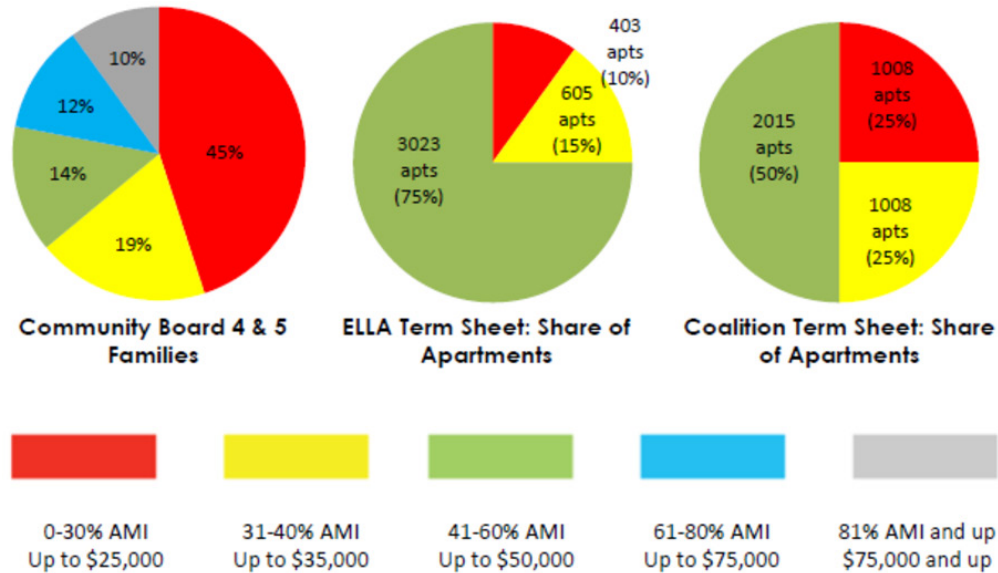
Our coalition has worked with nonprofit developers, community residents and the building and construction trades to create a new financing program that would subsidize affordable housing at the levels that reflect the current needs while also at a cost that reflect the needs of career oriented and safe jobs. The rezoning cannot move forward until this financing program is created. Under our proposal, the affordability levels of new subsidized apartments would be:

- 25% of apartments at 27% of AMI, (\$24,462 or less)
- 25% at 37% of AMI, (\$33,522 or less)
- 25% at 47% of AMI, (\$42,582 or less)
- 25% at 57% of AMI, (\$51,642 or less)



4 “Housing Affordability in Concourse/Highbridge: The Promise of Affordable Housing May Bring False Hope,” Institute for Children, Poverty & Homelessness (June 2016). Online at http://www.icphusa.org/PDF/reports/ICPH%20ConcourseHighbridge_Web.pdf.

Comparison: Rezoning Area Family's, City's Term Sheet, and Coalition Proposal



Under the Coalition’s proposal, over 600 more apartments would be available to families making less than \$25,000 a year than would be the case under the City’s ELLA term sheet. In addition, over 400 more apartments would be affordable to families making less than \$35,000 a year. In total, under the Coalition’s proposal, half of all of the apartments created by the rezoning would be affordable to families less than 40% AMI – twice the share of housing that would be created at these levels using the ELLA term sheet. By adopting the Coalition’s term sheet for subsidized housing, the City can help to ensure that this area remains accessible to low-income families for generations to come and make good on its promise to create affordable housing for the people who need it most.

We believe that use of our proposed term sheet offers numerous benefits, both immediate and long-term. First, housing built with this term sheet would be affordable to 78% of current residents in CB 4 and 5. Second, although this proposed term sheet would require greater City subsidy per unit, creating housing that is affordable to a greater share of lower-income CB 4 and 5 residents is ultimately far more cost effective than housing homeless families temporarily. Currently, many families in our communities are living doubled up, one step away from homelessness, and too many end up in the shelter system each year.⁵ Our proposal could help shift those trends. Third, our subsidy program, unlike the City’s, would promote safe, career-oriented union jobs, supporting economic stability for our residents. Fourth, our term sheet would help preserve the southwest Bronx as a mixed income community in the long-term. Today, “the neighborhoods that the Jerome Ave rezoning encompasses are already mixed-income neighborhoods. While the median income for a family of four is about \$25,000, close to 25 percent of households make above \$50,000 and 15 percent make above \$150,000.”⁶ At the same time, our communities already

5 See “Housing Affordability in Concourse/Highbridge: The Promise of Affordable Housing May Bring False Hope,” Institute for Children, Poverty & Homelessness (June 2016) (describing Concourse/Highbridge as “a chronic feeder to the shelter system, ranking among the top four community districts for the number of families entering shelter since FY 2005”). Online at http://www.icphusa.org/PDF/reports/ICPH%20ConcourseHighbridge_Web.pdf.

6 Susanna Blankley, “Four Wrong Ideas Driving de Blasio’s Housing Plan,” *City Limits* (Fe. 25, 2016). Online at citylimits.org.

have a surplus of housing affordable to families making more than \$50,000 a year. The City does not need to create more housing in our area to attract higher-income residents, or to justify long-overdue investments in our area as ways to attract richer people. The residents who are here today matter, and their needs matter whether or not any of our neighborhoods become the next “it” area in the City, as many developers seem to hope will be the case. By increasing the amount of housing that will be affordable to the people who are at the greatest risk of displacement, we can ensure that our area will stay accessible and meaningfully mixed-income over time.

Analysis

- The City should analyze and disclose the income levels of the households that stand to be displaced, then compare those figures to the amount of affordable housing expected to be made available at those income levels under the rezoning, in order to calculate the share of the new affordable housing that would potentially be accessible to current residents. The City should consider scenarios both with and without the 50% community preference.
- The City should also analyze and disclose the share of proposed housing that would be affordable at local income levels if the City were to adopt the Coalition’s proposed term sheet. Although we have already performed a basic analysis of the differences, we request that DCP perform this analysis as part of the public CEQR review process and include it in the record to allow the community to make meaningful comparisons between the two options.
- The City should not assume that developers will continue to accept HPD subsidies throughout the 15-year period following a rezoning. Instead, the City should analyze and disclose the impacts of the rezoning based on:
 - A scenario in which developers accept HPD subsidies for the entire period
 - A scenario in which developers accept HPD subsidies for only 5 years
 - A scenario in which developers accept HPD subsidies for only 10 years
 - The zoning text and public sites alone
- The City should look into past rezonings and examine housing market shifts after these rezonings, for the purpose of determining the length of time during which developers are likely to seek HPD subsidies and the point at which interest in such subsidies may cease due to improved market conditions. Although the City indicated in the context of the East New York rezoning that analyses of past rezonings go beyond the scope of the CEQR review process for new neighborhood rezonings, if the City ignores these past rezonings, it ignores valuable data that could help to create a more accurate picture of future neighborhood change in our area.
- The City should also disclose the extent of its capacity to move projects through the HPD subsidy pipeline - specifically, the number of projects and affordable units the City anticipates being able to move in the Jerome Avenue rezoning area a given year, given its current staffing, budgetary, and other limitations and the nature and extent of its work to create subsidized housing in other neighborhoods, including other rezoning neighborhoods.

Mitigation

- › If the City’s analysis demonstrates that the City’s current plans fail to adequately advance the goals of creating affordable housing for “all” New Yorkers, the City should disclose, analyze and adopt additional mitigation strategies, including the adoption of the proposed Coalition term sheet for subsidized housing; dedication of additional funds as needed to create more housing affordable at local income levels; and, potentially, a reduction in the scale of the rezoning to better reflect the amount of subsidized affordable housing that the City is realistically capable of producing within our community in the next 5-10 years, given limits on its own capacity and interests of developers as market conditions shift.

The Proposed Actions Will Not Advance Housing New York’s Goals of Affordable Housing Preservation and Equity—Unless the Coalition’s Anti-Displacement Strategies Are Adopted

The preservation goal of the Housing New York plan accounts for 120,000 of the total 200,000 affordable units the City hopes to build and preserve in the coming years. But the de Blasio administration has yet to develop a comprehensive policy to prevent the displacement of low-income people in rezoning neighborhoods and otherwise. Creating new affordable housing - though important - will do nothing to preserve affordable housing that already exists. Extending affordability of apartments where subsidy agreements are expiring - though also important - is extremely difficult. For example, a recent study of Concourse/Highbridge showed that, “Every single subsidized rental unit—more than 1,800—that was eligible to convert to market rate did so from 2002–2011, ending affordability commitments” in these apartments.⁷

Within this context, the protection of rent-stabilized apartments should be of paramount concern as part of the City’s overall preservation strategies. As the Housing New York plan states, “The most effective preservation strategies will depend upon neighborhood characteristics and needs.”⁸ For the communities in the Jerome Avenue impact area, neighborhood characteristics and needs demand a focus on better tools and strategies to preserve affordability and prevent displacement in rent stabilized housing in particular.

The City has invested significant funding into providing anti-displacement legal services for renters within the rezoning communities, acknowledging in the Housing New York plan that, “The lack of legal representation for low- and moderate-income tenants facing eviction limits their awareness of their rights as tenants and makes it more difficult for them to defend themselves against actions initiated by landlords. Legal services are a critical preservation tool as they can prevent landlords from pursuing evictions simply to move their apartments out of rent stabilization. Unfortunately, the current demand for tenant legal

7 “Housing Affordability in Concourse/Highbridge: The Promise of Affordable Housing May Bring False Hope,” Institute for Children, Poverty & Homelessness (June 2016) (citing NYU Furman Center Moelis Institute for Affordable Housing Policy, Subsidized Housing Information Project (SHIP) database, <http://furmancenter.org/data>, accessed April 19, 2016; NYU Furman Center Moelis Institute for Affordable Housing Policy, *What Can We Learn About the Low-Income Housing Tax Credit Program by Looking at the Tenants?* (October 2012). Online at http://www.icphusa.org/PDF/reports/ICPH%20ConcourseHighbridge_Web.pdf.

8 “Housing New York: A Five-Borough, Ten-Year Plan,” p.49. Online at http://www1.nyc.gov/assets/housing/downloads/pdf/housing_plan.pdf.

services far exceeds supply.”⁹ Though the existing anti-displacement legal services are meaningful, they are not enough. First, they are not sufficient to break the profit motive that will always drive landlords of low-rent, rent-stabilized apartments to make moves to push out low-income tenants. Second, they lack permanence, do not cover tenants just outside of the zip codes designated for legal services, and could disappear with a subsequent mayoral administration. And third, they are not comprehensive, in that defending tenants in housing court is all too often a response to landlord harassment that should not have occurred in the first place. That is why the Coalition is proposing three core anti-displacement strategies - passage of a citywide Right to Counsel, creation of a citywide Certificate of No Harassment requirement, and creation of an anti-displacement taskforce - that will help to create a comprehensive safety net around existing tenants in rent-stabilized apartments. These new strategies - described more fully in our response to the section on residential displacement - are necessary to shore up a critical source of affordable housing in our community.

It’s especially critical that the City develop meaningful anti-displacement strategies given the demographics of the communities the City is proposing to rezone - so far, almost exclusively low-income communities of color with long histories of divestment and institutional neglect. If “equity” is a goal of the Housing New York plan, it is troubling that the City has selected only low-income communities of color for neighborhood-wide rezonings, with no guarantees that any significant share of the new housing will be affordable to local residents and no commitments that new development will bring high-quality, career-track jobs.

In making these choices, the de Blasio administration is following closely in the footsteps of the Bloomberg administration, which also disproportionately targeted low-income neighborhoods of color for massive upzonings. Research into rezonings under Bloomberg shows that “upzonings occurred in areas with higher proportions of black and Hispanic inhabitants and significantly lower proportions of whites than citywide or in other types of rezoning.”¹⁰ In these areas, white populations increased significantly - in marked contrast to an overall citywide decrease in the white population¹¹ - and median incomes and the number of higher-income earners increased substantially.¹² Importantly, “figures make it fairly clear that in most cases, increases in neighborhood income were driven by newly arrived white households rather than upwardly mobile non-whites.”¹³ And nor were these changes inevitable, or part of broader citywide trends; in upzoned communities, “Even though housing supply outpaced population change, rents increased far faster than citywide.”¹⁴

9 Id at 53.

10 Leo Goldberg, “Game of Zones: Neighborhood Rezoning and Uneven Urban Growth in Bloomberg’s New York City,” Massachusetts Institute of Technology (June 2015) at 71. Online at <https://dspace.mit.edu/handle/1721.1/98935>.

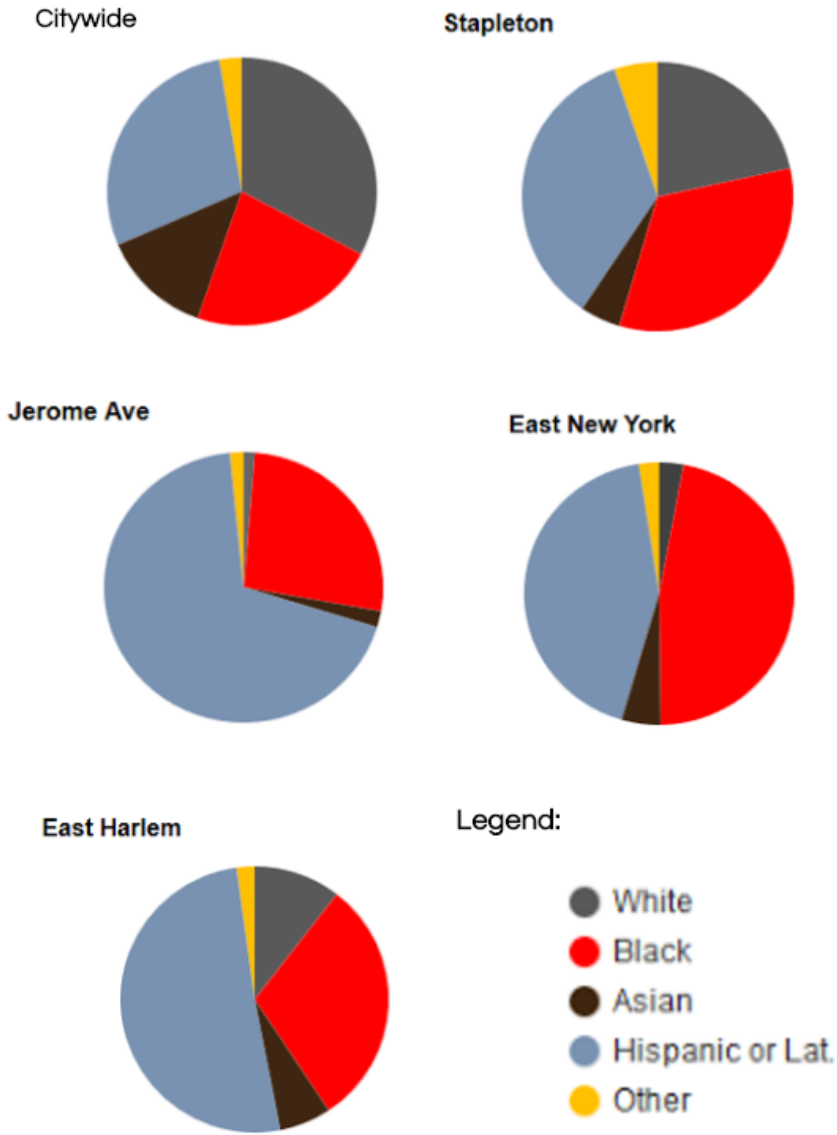
11 Id. at 66.

12 Id. at 67.

13 Id. at 68.

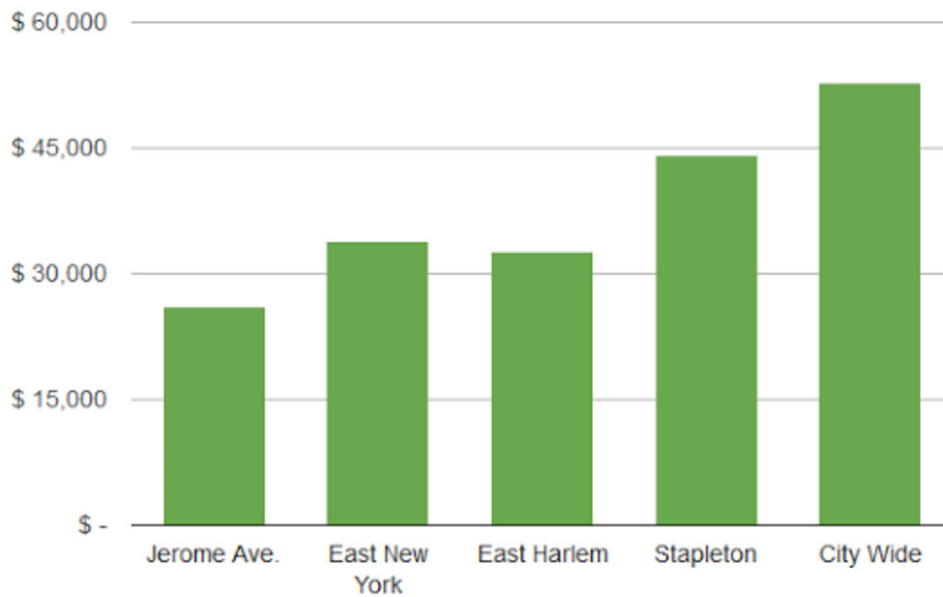
14 Id. at 83.

Racial Demographics of Rezoning Areas



1. Jerome Ave: Bronx County, NY, Census Tracts - 197, 199, 209, 211, 213.02, 217, 219, 221.01, 221.02, 223, 227.01, 227.02, 233.01, 237.03, 237.04, 239, 241, 243, 251, 253
 2. East New York: Kings County, NY, Census Tracts - 365.02, 367, 369, 906, 908, 1198, 1144, 1146, 1150, 1152, 1166, 1168, 1170, 1172.01, 1174, 1178, 1184, 1186, 1190, 1192, 1194, 1196
 3. East Harlem: New York County, NY, Census Tracts - 166, 170, 172, 174.02, 180, 182, 184, 188, 194, 196, 198, 206, 242
 4. Stapleton: Richmond County, NY, Census Tracts - 3,7,11,21,27
- All data - American Community Survey, 2014, 5 Year Estimates

Median Household Incomes in Rezoning Areas vs Citywide



1. Jerome Ave: Bronx County, NY, Census Tracts - 197, 199, 209, 211, 213.02, 217, 219, 221.01, 221.02, 223, 227.01, 227.02, 233.01, 237.03, 237.04, 239, 241, 243, 251, 253

2. East New York: Kings County, NY, Census Tracts - 365.02, 367, 369, 906, 908, 1198, 1144, 1146, 1150, 1152, 1166, 1168, 1170, 1172.01, 1174, 1178, 1184, 1186, 1190, 1192, 1194, 1196

3. East Harlem: New York County, NY, Census Tracts - 166, 170, 172, 174.02, 180, 182, 184, 188, 194, 196, 198, 206, 242

4. Stapleton: Richmond County, NY, Census Tracts - 3,7,11,21,27

All data - American Community Survey, 2014, 5 Year Estimates

We believe it is possible for the de Blasio administration to begin to write a different narrative and to achieve equitable development with this rezoning - but only if the City takes seriously the need to ensure that today's community residents will be around to reap the benefits of the better tomorrow the City promises, and only if the City centers the goal of creating new economic opportunities and paths to advancement for current residents.

Analysis

In analyzing the consistency of this proposed rezoning with other policies, the City should consider:

- › The extent to which the Proposed Actions would create affordable housing for “all” New Yorkers, in particular individuals and families making below 30% AMI, who represent a significant share of rezoning area residents and are grossly underserved by the City’s current MIH policy and subsidy term sheets.
- › The feasibility of adopting the Coalition’s proposed term sheet in order to better advance the creation of low-income housing.
- › The extent to which the Proposed Actions would advance the goal of Housing New York to “preserve rent-regulated ... affordable housing,” “stem the tide of units exiting rent stabilization” and “strengthen protections for tenants of rent-stabilized housing,”¹⁵ versus the extent to which an influx

15 “Housing New York: A Five-Borough, Ten-Year Plan,” p.52-53. Online at http://www1.nyc.gov/assets/housing/downloads/pdf/housing_plan.pdf.

of housing aimed at higher-income residents might undermine these goals.

Mitigation

If the City concludes that the proposed rezoning fails to create affordable housing for “all” New Yorkers or is otherwise inconsistent with larger policy initiatives, the City should modify its plans to better meet these goals and/or adopt mitigation strategies to ensure that the proposed rezoning more closely aligns with the City’s stated policy goals. Among other mitigation strategies, the City should consider:

- › The adoption of the Coalition’s proposed term sheet in order to better advance the creation of low-income housing.
- › The adoption of the Coalition’s proposed preservation strategies to more effectively advance the goal of preservation. The City has pledged to “proactively reach out to ... community groups to identify preservation opportunities in the broader housing stock ... [to] design and target preservation tools to address the needs of properties that existing programs currently do not serve.”¹⁶ We believe that Right to Counsel, a citywide Certificate of No Harassment policy, and an anti-harassment task force will serve critical needs that the City’s current policies and programs do not reach, and we urge the City to implement all three strategies, which have a broad base of community support.

The List of Applicable Policies is Incomplete

Analysis

- › The City should analyze the consistency of the Proposed Actions with the City’s Industrial Action Plan. The list of public policies that apply to the study area¹⁷ notably excludes Mayor de Blasio’s industrial policy, announced in fall 2015. The Industrial Action Plan is available here: <http://www.nycedc.com/industry/industrial> and should be named and addressed as a policy that applies to the area.
- › The City should undertake a study and develop a citywide policy for the auto sector. The Bronx Coalition for a Community Vision and others have been calling for the City to craft an auto sector policy before proceeding with land use actions, such as this one, that will deeply impact the sector. The Jerome auto corridor is the second densest cluster in the City, and 80% of the auto businesses in community districts 4 and 5 are located in the rezoning area. Currently, less than 1% of city land is zoned C-8 and just 14% is zoned M. A citywide study that looks at the city’s need for auto repair, land use considerations, and other issues for the sector’s future is needed to fairly guide actions that will have a major impact on the industry’s local presence, and consider them in the context of citywide needs.

Mitigation

If the City finds that the Proposed Actions fail to advance the goals of the existing Industrial Action Plan or harm the auto businesses on Jerome Avenue, the City should modify its plans or adopt mitigation strategies as appropriate. These strategies could include:

16 “Housing New York: A Five-Borough, Ten-Year Plan,” p.49. Online at http://www1.nyc.gov/assets/housing/downloads/pdf/housing_plan.pdf.

17 Draft Scope of Work, p.29.

- › Maintaining no net loss of C8-3 and M1-2 land and buildable FAR citywide.
- › Adoption of a citywide policy for the auto sector, as described above.

Expansion of Study Area

The secondary land use study area should be expanded from a quarter-mile boundary from the rezoning area to a half-mile or more from the rezoning area. The planning area that is mentioned as part of the “JANP” process is a half-mile, and the study area for this land use action should correspond with that of the Plan it is supposed to support. Furthermore, certain analyses detailed in the draft Scope of work will look at half-mile study areas while others do not. This is inconsistent and confusing, and there is no compelling rationale offered for these differences. The Proposed Actions are likely to have far-reaching effects and this proposed rezoning is only the first step in a process that is intended to plan for a much larger area.

III. Socio-Economic Conditions

Residential Displacement

“I’m all for the new. The people who live in the Bronx deserve new, they deserve good, they deserve fair. But they don’t deserve it if the new, the good, and the fair is going to push us out.”

- Bronx resident at the Draft Scoping Hearing

“My children were born in the Bronx, as well as my grandchildren ... I’m not saying we don’t need improvement, but not at the expense of people who have been here for decades ... [and] built their communities ...”

- 30 year resident of 1081 Jerome Avenue at the Draft Scoping Hearing

“I have been living here in the southwest Bronx since 1975, and have contributed all I could to help preserve my community, in my adopted home, for my own self and for my family here in New York ... I was here during the ugly days when the city of New York as well as Main Street New York disinvested in the borough – when, as the popular phrase goes, the Bronx was burning. I was here when fire houses were closed; when schools and after-school programs were defunded; when parks and our other green spaces were neglected and left to deteriorate along with other parts of the infrastructure. I was here and stayed here when others were leaving. I was not alone. Tens of thousands of others were here, too. Building families and communities. Creating businesses to serve the communities we were maintaining. Working two and sometimes more jobs to take care of our families. Dedicating our lives to making sure our children get opportunities we did not have, becoming college and university graduates, becoming doctors and nurses and lawyers and engineers and architects and teachers and bio-chemists and judges and physicists and accountants and other career professionals in all areas of life. And here, this evening, in this space, I am before you to decline the reward you have offered me and the rest of us for our decades of struggle to maintain and grow our communities despite all odds. And ‘What is that reward?’ you may ask. My displacement. Our displacement. For that is what you are proposing in your Scope of Work just recently released. You are saying in the clearest possible terms that you need the space we are occupying, that the tens thousands of us have called our home, for others. So we got to go.”

- Fitzroy Christian, CASA Tenant Leader & Bronx Coalition for a Community Vision member

Progress and change are not the same as gentrification. Gentrification is the process of creating or

transforming a neighborhood exclusively for the gentry. Progress can and should mean stability, security, and opportunity for all who live and work in the community - including, even especially, those who have been traditionally disadvantaged and denied access to job and career opportunities and safe, affordable housing. But change that does not fully examine and proactively address the needs of local residents and businesses is likely to become gentrification. Historically, neighborhood-wide rezonings in New York City have failed to slow rising rents or stem the displacement of low-income residents. We will not allow that to happen here. We deserve to build neighborhoods for and by the people who live and work in our community so that we can live with dignity and respect. This includes preventing residential displacement, and preserving jobs for local residents that provide access to pathways for advancement.

The Draft Scope documents the current housing conditions of the impact area—or all of Community Boards 4 and 5. Two-thirds of the housing stock is government-regulated. The community is made up primarily of low-income people of color. Median household income is \$25,900, and only 25% of households make more than \$50,000. Approximately 45% of residents have incomes at or below 30% of AMI. And although rents in the area are lower than in many other parts of the city, they are already above what is affordable for many local residents. In 2014, the most recent year for which we have data, the median asking rents in CB4 and CB5 were \$1,395, and \$1,250 respectively - levels already unaffordable to well over 2/3 of existing residents. And rents are steadily increasing. The median rent for CB4 rose by 10.3% from 2005 to 2014. In CB5, the corresponding increase was 7.5%.¹⁸

Household Income	AMI Level	% CB4 Population	% CB5 Population
>\$20,000	Below 30% AMI	40.7%	48.7%
\$20,000-\$35,000	30%- 40% AMI	19.6%	18.5%
\$35,000-\$50,000	40%-60% AMI	13.4%	13.9%
\$50,000-\$75,000	60%-80% AMI	14.4%	10.2%
\$75,000-\$100,000	80%-120% AMI	7.5%	4.0%
\$100,000 and up	120% AMI & up	4.4%	4.7%

U.S. Census Bureau; American Community Survey 3-Year Estimates, 2014.

The neighborhoods surrounding Jerome Avenue are majority Latino, with a substantial Black population, and small White and Asian populations.

	NYC population	CB4&5 Combined Population	Population in Census tracts touching Jerome Ave study area
White	32.7%	1.45%	1.5%
Black	22.6%	29.1%	26.7%
Asian	13.2%	1.5%	2.4%

¹⁸ “State of New York City’s Housing and Neighborhoods in 2015”, Furman Center, NYU.

Latino	28.8%	66.5%	68.5%
Other		1.6%	1.6%

U.S. Census Bureau; American Community Survey 3-Year Estimates, 2014.

Unsurprisingly, given the numbers just listed, rent burdening is a serious problem for local residents. In CB4 median rent burden in 2014 was 39.7%, with 47.9% of low-income households severely rent burdened. In CB5, median rent burden in 2014 was 45.6%, with 48.5% of low-income households severely rent burdened. Most tenants (over 55%) pay more than 30% of their income towards rent.¹⁹

Household Income	AMI	# Rent Burdened Households, CB4&5 Combined	% of Households Rent Burdened, CB4&5 Combined
<\$20,000	Below 30% AMI	34,617	84%
\$20-\$35,000	30% to 40% AMI	14,168	80%
\$35-\$50,000	40% to 60% AMI	7,448	59%
\$50-\$75,000	60% to 80% AMI	1,740	15%
\$75-\$100,000	80% AMI and greater	318	3%

U.S. Census Bureau; American Community Survey 3-Year Estimates, 2014.

A survey conducted by the Bronx Coalition for a Community Vision found that 59% of respondents were concerned about being displaced from the neighborhood. Numerous residents have provided examples of both rising rents and landlord harassment as having displaced or threatened to displace them from their homes.

At the public scoping hearing, one woman testified, “My family has been in the Bronx for over 60 years and I serve my borough as a case manager for families who are facing displacement ... After the rezoning proposals, you can’t even imagine how many more families came to my office praying and begging ... Landlords were telling them directly to their face, ‘The rezoning is going to get me a lot of money, I’m going to rent to richer white people’ ... Any progress that is made through walking all over us is not for us.”

However, the methodology for measuring indirect displacement in the draft scope promises to severely underestimate the real risk to many local residents because it considers only legal forms of displacement. Over half of the housing units in CB4 & 5 are rent stabilized. In theory, these residents are protected from displacement because they have the legal right to a lease renewal, and landlords are legally limited as to the rent increases they can impose. In fact, DCP’s methodology automatically assumes that rent stabilized tenants will not be displaced, and looks no further. But in reality tenants – especially rent stabilized tenants – commonly face a wide range of harassment tactics specifically designed to drive them out of their homes so that landlords can take advantage of both legal loopholes in the rent laws, and insufficient enforcement practices, to raise rents and deregulate apartments. And the displacement of tenants from rent regulated apartments often leads to the deregulation of that apartment, or at least to significant

¹⁹ U.S. Census Bureau; American Community Survey 3-Year Estimates, 2014.

jumps in the legally allowable rent. In other contexts, the Mayor, HPD commissioner, and other City officials have clearly recognized that rent stabilized tenants face harassment - yet DCP's methods ignore it.

The rezoning area is currently comprised of mostly nonresidential uses. If the rezoning goes through, developers will not need to tear down residential buildings to build higher ones; they will be building on sites that today are empty or include other uses, such as auto businesses. The City therefore projects direct displacement of fewer than 500 residents and concludes that this would not "typically be expected to alter the socioeconomic characteristics of a neighborhood," making it unnecessary for the City to study direct residential displacement at all.

The City does say that it might conduct a detailed analysis of indirect residential displacement – the type that is caused when an influx of higher-income tenants move into a neighborhood and change the local housing market, driving up rents for everyone. But the City MUST commit to looking at this issue, which is critical for our community. The fact that residential displacement isn't a central area of study is highly problematic. Without a mechanism to create real affordable housing, the more than 12,000 new residents that the rezoning will bring will make at least \$25,000 more than the average neighborhood Bronx family. If higher income tenants move in, services will change in the neighborhood and other higher income tenants will move into the rent stabilized housing.

As new development targeted at a different population with a different income level increases, the gap between the amount landlords are currently getting in rent stabilized apartments and the amount the local market would bring them – or the amount they *believe* the local market would bring them – increases, further adding to the perverse incentive structure that tells landlords harassing tenants pays off.

Landlords who already engage in a series of illegal behaviors that cause displacement and whose business plans often rely on such displacement, as has been incredibly well documented by grassroots campaigns against predatory equity, will have an even greater incentive to harass lower-income rent-stabilized tenants out of their homes to make way for higher income residents. But the City typically does not examine illegal tactics of harassment and displacement in the environmental review process. Because of this, the City will not be addressing the harsh realities low-income rent stabilized tenants are likely to face after the rezoning—masking the true impact of the City's actions. Not studying the illegal behavior the rezoning will fuel, and its impact on tenants, is simply irresponsible and unacceptable. This rezoning will result in an increase in both legal and illegal displacement. We cannot and should not have to wait for ULURP to start to hear from the city about a comprehensive anti-displacement plan.

In order to accurately evaluate the likely secondary displacement impacts of the proposed rezoning along Jerome Avenue, DCP must not assume that rent regulated tenants are secure in their homes, nor that those units will remain affordable simply thanks to the existing laws and regulations that govern them. Any method of study that accounts only for legal methods of displacement ignores the reality of tenant harassment as a pervasive problem, and dismisses the very real threat of displacement to the rent stabilized tenants of the Bronx.

Further, DCP should look at likely secondary displacement impacts in relation to a range of potential

development scenarios under proposed zoning changes, because differences in both amounts and rent levels of new housing will have different likely impacts on the rates of indirect residential impact we should anticipate seeing. For example, an assumption that most new units will be built using both MIH and HPD’s ELLA subsidy program would yield an incoming population that is richer and whiter than the current local population. Even though both MIH and HPD’s ELLA subsidy programs generate affordable housing units the majority of the units are priced above the local population and therefore bring an incoming population that is distinct that the current neighborhood.

An examination of other neighborhoods that have seen a substantial increase in Non-Hispanic or Latino White population to a previously Black and/or Latino community indicates cause for concern about the impact on both loss of rent regulated housing and rates of rent increases. Citywide, the percent change in the white population decreased by 6.01% from 2000 to 2014. However, in some neighborhoods, the trend was drastically different. Bedford Stuyvesant (Brooklyn CB3) saw the most drastic jump, with the percent change in the white population increasing by 665.76% over that same period. These same neighborhoods saw higher rates of the loss of rent regulated housing than the citywide average, and much higher increases in median rents. The 5 community districts with the highest rates of white share of population increase each saw either an above-average rate of rent increases or an above average rate of loss of rent regulated units – and some had both. The chart below illustrates the correlation.

Changes 2000-2014

	% Change in White Population	Rent Reg Loss	Change in Median Rent
Rent			
Citywide	-6.01%	-17.83%	14.7%
BK CB3 (Bedford Stuyvesant)	665.76%	-32.90%	26.1%
MN CB10 (Central Harlem)	478.96%	-16.30%	24.7%
BK CB4 (Bushwick)	276.28%	-35.80%	33.8%
BK CB8 (Crown Hts)	156.93%	-23.83%	13.0%
BK CB16 (Brownsville)	108.92%	-14.31%	24.6%

U.S. Census Bureau; American Community Survey 3-Year Estimates, 2014. U.S. Census Bureau; Decennial Census, 2000.

Bringing in more than 12,000 residents and displacing almost all of the auto industry is an extreme act. Where is an equally extreme effort to enact an anti-displacement plan for residents who live here now? We need a study that encompasses both the legal and illegal displacement that could occur.

Furthermore, the Jerome Avenue proposal does not exist in a vacuum, but rather should be considered in the context of past, current and future actions, and within the context of public and private actions. To the North, the Webster Avenue rezoning has already spurred private investment in the surrounding area.²⁰

²⁰ See Rebecca Baird-Remba, “Permits Filed: 235 West Kingsbridge Road, Kingsbridge Heights,” YIMBY (Sept. 12, 2016) (site on West Kingsbridge Road reported on as an example of a site anticipated to be filed for market development). Online at

To the South, there is market rate development ongoing in the Port Morris Section of the Bronx, along with aggressive efforts to “re-brand” the area as the “Piano District,” an approach that has preceded every area being gentrified in the city to date. This market-based development is complemented by the Melrose Common Urban Renewal Plan, substantially developed for affordable housing at 60% AMI and above, which excludes the majority of area residents, targeting “affordable” units for those earning two or more times the incomes of the area residents. To the east, there are plans underway for transforming of the Sheridan Expressway, providing new boulevards and new housing, along with an expanded park and various points of entry for waterfront access. The “impact area” for that proposal stretches from Bronx Park South to the tip of Hunts Point. Now, to the west, there is the Jerome Avenue Rezoning Plan, anticipated to spur the development of over 4,000 units of new housing along 73 blocks, relying on MIH to provide permanent affordability, which is not affordable to the vast majority of local residents, displacing hundreds of jobs, and likely already encouraging displacement and tenant harassment in adjoining neighborhoods by its simple announcement. All of these past, present and anticipated future actions need to be part of the cumulative impact assessment on South Bronx residents as a result of the proposed Jerome Avenue rezoning.

Analysis

In order to appropriately analyze the likely impacts of the proposed rezoning on residential displacement, DCP should:

- › Separately analyze preservation and creation of affordable housing. Creation of new affordable housing does not protect existing residents of the community, many of whom will be displaced by the time the new housing is created.
- › Look both at the impact on that housing stock typically included in the City’s evaluation of units preserved through subsidy and/or regulatory agreements, and at rent regulated housing that lacks additional regulatory frameworks, which is a different and crucial source of affordable housing for which City actions can speed or slow the rate of loss.
- › Analyze the effect on overall median rents that various city actions could have, examining not just units that fall into particular categories of regulation but also simply affordability levels.
- › In its analysis of potential displacement, present both best- and worst-case scenarios for the direct displacement that may be caused by the actions of private landowners who may seek to redevelop their sites after the rezoning. Although CEQR [City Environmental Quality Review] typically requires an analysis that illustrates a “conservative assessment of the potential effects of the proposed project on sites likely to be redeveloped,” we are concerned that for an area-wide rezoning of this magnitude, a “conservative assessment” will paint an inaccurately mild picture of potential displacement. Therefore, the City should present both best- and worst-case scenarios so the community can have a better understanding of the full range of possible outcomes in terms of direct displacement.
- › Conduct a detailed analysis of direct residential displacement, even if DCP’s initial assessment suggests that the amount of direct displacement falls below the threshold that requires a detailed analysis. This detailed analysis would require DCP to examine prevailing trends in vacancies

and rental and sale prices in the area... DCP should also conduct a detailed analysis of indirect residential displacement.

- Analyze both the extent to which the rezoning may cause indirect residential displacement, and the degree to which it may accelerate displacement that is already occurring. This is required by the CEQR Technical Manual, and it is a critical piece of the analysis because it permits the community to assess whether and the extent to which the rezoning might exacerbate displacement pressures our residents are already experiencing today. In the critical *Chinese Staff and Workers* case, the New York Court of Appeals held that, “The potential *acceleration of the displacement* [emphasis added] of local residents and businesses is a secondary long-term effect on population patterns, community goals and neighborhood character such that CEQR requires these impacts on the environment to be considered in an environmental analysis. The fact that the actual construction on the proposed site will not cause the displacement of any residents or businesses is not dispositive for displacement can occur in the community surrounding a project as well as on the site of a project.”²¹ Typically, the City responds to the community’s concerns about the rezoning by saying that gentrification and displacement are already occurring and by stating, in a conclusory manner, that the rezoning will help address these problems. This is not sufficient to meet the requirements of the CEQR process; the City must analyze the extent to which displacement may be accelerated.
- Expressly address the potential displacement risk of vulnerable populations in the area, including:
 - Tenants in unregulated apartments
 - Tenants in rent stabilized apartments
 - Tenants who are rent burdened
 - Tenants in apartments where regulatory agreements for affordability are expiring
 - Shelter, halfway house, and three quarter house residents
 - Residents of cluster site housing
 - Section 8 voucher holders
 - People of color
 - Seniors. One elderly tenant spoke powerfully to the displacement risks faced by seniors at the Draft Scoping hearing: “The majority of us – the most that we make is \$25,000 a year... half of that goes to rent. Another quarter goes to your medication. Whatever you got left is for food and for clothing, and God forbid you don’t get sick too many times ... What is going to happen to us [seniors]? We can’t go to the shelters anymore, the shelters are full. I worked all my life ... If next year, my rent goes up \$100 like it did this year, I gotta go. We the seniors need help.”
- Analyze and disclose the impacts of past rezonings of similar magnitude as the proposed Jerome Ave rezoning. As part of this, the City should disclose and analyze demographic information suggestive of displacement, including changes (pre and post rezoning) in:
 - Racial demographics
 - Local area median income
 - Educational attainment level of residents

21 *Chinese Staff & Workers*, 68 N.Y.2d at 367.

- Average rent levels in market-rate units
 - Number of rent-stabilized units
 - Percentage of non-English speaking populations
- › Consider the Jerome Avenue proposal in the context of other public and private actions
- Under the 1986 *Chinese Staff Workers* case, when a proposed action is inconsistent with area character and is likely to change neighborhood population patterns and community character, the city is required to consider secondary, as well as cumulative, impacts.
 - In assessing cumulative displacement, the President’s Council on Environmental Quality explains that consideration should be given to a proposed action’s cumulative effects in the context of “past, present, and reasonably foreseeable future actions regardless of who undertakes the action.”
 - The cumulative assessment for the proposed Jerome Avenue rezoning should cover an area that at the very least covers Bronx Community Districts 1 through 6. Considerations should include, but not be limited to, direct and indirect resident displacement; loss of political power; loss of cultural expression and interaction; loss of access to necessary and affordable goods and services; loss of social networks, destruction of social capital, and loss of institutional affiliations, including churches.

Mitigation

The City should analyze, disclose, and adopt a broad range of mitigation strategies for residential anti-displacement, including all those described in the Coalition’s platform. Most importantly, the City must take proactive measures to preserve affordable housing and create high-quality local jobs, as described more fully below.

Preservation of Affordable Housing

- › Pass and fund Intro 214, providing a right to a lawyer for tenants facing the loss of their homes. For many years, advocates and tenants throughout New York City have been advocating for New York to establish a Right to Counsel—a right for New Yorkers facing the loss of their home to have an attorney to defend them even if they are too poor to pay for counsel. From a funding perspective, we are closer to a Right to Counsel than we’ve ever been. But a right is so much more than just funding. We believe that people have a right to stay in their homes and communities with dignity and respect, and that housing court can become a place where justice is applied equitably. A Right to Counsel is a key piece in making these goals a reality. Although the anti-displacement legal services the City has created are an important start, a Right to Counsel would make provision of legal representation less vulnerable to the funding priorities of a future administration and close the gaps in services that are already being provided now (including by guaranteeing services to tenants who may experience displacement pressures, but fall outside the zip codes currently covered by anti-displacement legal services funding). In addition, a Right to Counsel would help ensure tenant safety by empowering tenants to report housing code violations, form tenants’ associations, file overcharge complaints, and even take their landlords to court - secure in the knowledge that they will have legal counsel if a landlord attempts to punish them for exercising their rights. A fully funded and well-implemented Right to Counsel, which could be phased in over time, would be a

strong step forward in the path toward institutionalizing justice. More information about the need for and financial benefits of Right to Counsel is attached as Appendix A.

- Pass and fund Intro 152-A, which would create citywide “Certificate of No Harassment” requirements, preventing landlords who have harassed tenants from getting certain permits from the Department of Buildings unless they agree to set aside part of the building as permanently affordable housing. This model has been locally effective in the Clinton special district, and should be expanded by requiring that DOB and HPD put a similar policy in place across the city. In addition, the policy should apply to a larger set of DOB permits. More information about the need for and benefits of a citywide Certificate of No Harassment policy is attached as Appendix B.
- Create an Anti-Displacement Task Force, with regular meetings between local community organizations and HPD to discuss strategies for preservation. The task force should have the necessary resources to use all of HPD’s available tools, including AEP, 7A, 8A loans, aggressive litigation, and Spiegel, in a collaborative, focused, and consolidated way to maximize impact.
- Create a live map of distressed buildings allowing local community groups to map progress and insert updates based on local information gathering. The map should include every residential building in CB 4 & 5, and the following information about each building:
 - Ownership status, private vs. nonprofit
 - High rate of violations (3 or more) per unit
 - Financial Distress
 - Pattern of Cases in Housing Court
 - Word of Mouth Harassment Complaints
 - MCIs
 - High percentage of units with Preferential Rents
 - Foreclosure
 - Level of engagement, including who has done outreach at what time periods, whether an active Tenant Association exists, and whether the building has engaged in litigation
- Adopt a new HPD subsidy term sheet to ensure that new housing more closely reflects the income levels of current neighborhood residents. Although new affordable housing should not be thought of as a direct mitigation for displacement, the more closely new housing matches the current income and rent levels, the less likely it is that new development will change neighborhood conditions in a manner that triggers higher rents, gentrification and displacement.

Local Hiring

There is nothing in this scope about the jobs needed to create more than 4,000 units of housing or the safety requirements for those jobs. 4,000+ units of housing will create about 4,000+ construction jobs.

In her testimony at the Public Scoping hearing, a community member asked, “Who will build this new housing? As a woman in the construction industry, my concern is, will women and local residents have opportunities associated with the more than 4000 apartments that are being built? ... With unemployment in the community at 15% and the average income at \$24,000, the average single woman making less than

\$20,000, why isn't the City studying the socioeconomic impact of job creation? ... The community deserves the opportunity to join the middle class, just as I did 18 years ago when I was a single mother of three kids ... The union provided me with good wages, equal pay, and skills ... The working man is not a sucker. Put the money in the hands of the people, and they will put the money back in the community!"

Our neighborhoods have a 15% unemployment rate. Only 60% of the population over 16 participates in the labor force. If we are creating jobs in our neighborhood, we need to create jobs for our neighborhood. And not just any job, but safe, well-paying jobs. Moreover, we don't want jobs—we want pathways to careers. With more than 4,000+ workers needed to build these buildings, we need to ensure that they come through state approved apprenticeship programs and that we have local hire provisions.

The city can act now to reform its subsidy programs to mandate local hire and state approved apprenticeship programs. The city can act now to pass legislation to make sure work sites are safe and that workers are protected. The city cannot and should not facilitate the creation of 4,000+ jobs, without making sure they are high quality, well-paying jobs, for the Bronx.

- Ensure local hiring, because no apartment is affordable without a job. City agencies (such as HPD) and the Economic Development Corporation (EDC) should make local hiring a requirement of projects they fund. The City should make this a requirement for all agency-funded projects citywide, through either legislation or an Executive Order issued by the Mayor. This would be especially helpful in the rezoning communities, where the City is investing a lot of money, where the risk of displacement is high because of increased development interest, and where the existing need for jobs is great.
 - When City agencies or the EDC start projects, they put out Requests for Proposal (RFPs) for developers who want to build the projects. These RFPs must include specific local hiring standards and state that developers who are prepared to meet those requirements will be given preference in the selection process.
 - These standards should be similar to and build on the standards and requirements set in the Build It Back Sandy recovery RFP:
 - *Targeted hire standards:*
 - 30% of work hours conducted by local residents
 - *15% of work hours conducted by disadvantaged local residents*
 - 10% of work hours conducted by women
 - *Local Hiring Plan. Requirement that the Contractor develop a plan that*
 - Clearly demonstrates the proposer's plan and capacity for ensuring compliance with the hiring requirements, and
 - Identifies local organizations that the Contractor will work with to establish job pipelines and career opportunities on each project.
 - *Dedicated Staff. The Contractor must provide at least one full-time staff member dedicated to tracking daily hiring at the job sites and ensuring implementation of the*

requirements of the Plan.

- *Reporting Requirements. The Contractor must comply with, in the least, monthly reporting requirements in line with Local Law 140 of 2013, known as the Sandy Tracker Bill.*
- Provide Job Training & Education to local residents. The City should provide funding for programs to ensure that local residents are eligible and prepared for state certified apprenticeship programs.
 - Fund GED programs in neighborhoods where apprenticeship programs are being implemented.
 - Allocate additional funding dedicated to local apprenticeship programs and implement them before construction projects begin so that there is a pool of skilled, available and local workers. The city must also conduct outreach so people know about training programs.
 - Provide scholarships, childcare and other support to residents so they can access apprenticeship programs.
 - Allocate funding to enable community-based organizations to provide sector-specific workforce training. The city should fund local Bronx organizations to provide training for industries with a strong presence in the Bronx. Focus trainings on fields that offer high-quality, highly skilled jobs.
 - HRA and SBS should also have job training programs and transitional job programs that train residents for jobs in the sectors where new jobs are being created.

Business Displacement

“When I came to this country, the first avenue I knew was Jerome Avenue...and because of my work eventually I was able to own my own business...I want to say to the Governor of New York, the Mayor, the elected officials, you are elected to represent the people, not to take people out, not to take the salaries of the workers of Jerome Avenue. I understand the world is changing and we want to modernize...but the changes have to be with the people and by the people. And not enough people are talking about the auto workers...but we serve the poor people of the Bronx... we want to be part of serving the people of the Bronx, we want to be part of the development of the Bronx. I want the city to remember that every step you take is going to be paid for at the end because this is the town that votes for you.”

- Miguel Diez, CASA member and automotive worker

“Do you think that the auto workers on Jerome, who work hard every day to provide for their families, do you think they want to get rid of 75% of their jobs? It’s late at night, and one person spoke in favor of the rezoning, and he got booed. It’s very clear what the community wants ... The community does not want this deal, and any deal that comes in should benefit them, and require local hire and good jobs like the ones you’re getting rid of on Jerome Avenue ... “

-Speaker at Bronx Draft Scope hearing

On the Displacement of the Immigrant Auto Industry

The scope is completely silent on the benefits of the auto industry. Instead, according to the scope, auto shops (heavy commercial uses), block sidewalks, encourage vehicles to cross into auto shops and parking garages, operate in bays and behind heavy gates removing “eyes from the street,” and produce extreme levels of noise, all of which are generally “incompatible with a strong pedestrian experience.”

We will correct that here. Auto repair businesses are an important source of jobs for people of color, immigrants, and people without a high school diploma or college degree. In NYC, more than 60% of auto workers are immigrant, 75% are people of color (with large percentages of African Americans and Latinos), 25% of auto jobs pay \$40,000 to \$60,000 a year, 23% of auto jobs pay more than \$60,000 a year, about 70% of auto workers have a high school diploma or less²².

Auto repair jobs—like mechanics and body repair—pay better than other jobs that don’t require a formal degree, like restaurant and retail work. For example, the average annual wage for auto jobs in the New York area is \$44,000, compared to \$25,000²³ for food preparers. The city currently has no stated intention to assess loss of jobs and the impact on the local economy, neighborhood, communities and families.

The proposed Jerome Avenue rezoning area is home to more than 100 shops, which employ hundreds of people²⁴. It’s one of the densest auto corridors in the city, with high concentrations of businesses in a small area. This increases the area’s competitiveness, because customers go to places where they can find many services in one place and hunt for the best price.

These businesses show no signs of wanting to move within the next 10 years. 77% of businesses surveyed along Jerome Avenue by United Auto Merchants Association (UAMA) say they plan on staying. 60% of these businesses have been operating and providing jobs on the corridor for more than 15 years.

Despite these “retention areas,” the zoning of 83% of the land currently available for auto-related uses will change to allow housing. Landlords will be able to make more money from their property by selling it, or redeveloping it to build housing or bring in businesses that can pay higher rents.

Under the current plan, the land the city will keep available for auto-related uses represents less than one-third of Jerome’s auto sector. Only 28% of existing auto businesses are in these retention areas, and only 26% of Jerome’s auto repair workers work at these businesses²⁵.

The rezoning plan’s message to the predominantly Dominican Auto Industry is: Get Out of the Way.

The proposed rezoning corridor is a complex economic ecosystem that includes tenant businesses, subtenant businesses, and a large workforce with high percentages of immigrants who derive their livelihoods in a variety of arrangements, including full time, part time, and “per job” commissions. These conditions are poorly captured by traditional data sets. When considering the analysis of business and

22 ACS PUMS 5 Year 2014

23 NYSDOL Occupational Employment Statistics

24 UAMA Auto Survey 2015

25 NETS 2014

worker displacement, it will be essential for the scope of the DEIS and the DEIS not to rely on standard methods of “behind the desk” data sets and to instead incorporate field data that is reflective of the reality of businesses and workers in the rezoning corridor.

In addition, many restaurants, retail stores, churches and social service organizations currently rent space on the streets that will be rezoned. Under rezoning, they risk being displaced as property owners demolish their buildings, rebuild and seek higher paying tenants.

To date, the city has expressed an indifferent view to the fate of the auto sector. Hundreds of shops were displaced from Willets Point to make way for more “attractive” uses at the expense of a largely immigrant workforce. Without a plan to accommodate the relocation or meaningful retention of the auto sector on Jerome Ave, the businesses and workers who have made their living in the area for decades will be forced out of business and out of work with nowhere to go. The city must change its stance on the fate of the auto sector or risk widening the gap of economic equality instead of closing it as intended by this administration.

Context

Auto and Industrial businesses are valuable and will experience significant negative impacts due to the proposed rezoning. This reality is disregarded by the Draft Scope and documents upon which it relies.

The proposed Jerome Avenue rezoning will have a significant impact on auto related and industrial businesses that currently exist in the study area. There are statements in the draft Scope that indicate that this sector is not valued by the City and subsequently scapegoated for many of the negative characteristics currently associated with Jerome Avenue.

For example, the draft Scope cites noise levels that destroy the pedestrian experience on Jerome Ave²⁶ as attributed to uses under the current zoning in C8-3 and M1-2 (i.e. auto). Considering that the Jerome is located underneath an elevated train, it’s disingenuous to portray local businesses as the sole or even primary source of noise on the avenue.

The draft Scope also relies on documents that include similarly biased and unsubstantiated claims about the auto industry. For example, the Place-Based Community Brownfield Planning Foundation Report on Existing Conditions – Jerome Avenue Corridor (2015) states²⁷, without any substantiation: “Despite their proximity to mass transit stations, both Cromwell and Jerome Avenues are lined with dismantling shops, junk yards, open parking lots and auto-repair shops whose operations frequently spill over into the public streets and sidewalks. These uses do not generate significant jobs or provide basic services to local residents.”

It seems that the displacement of this sector which is so critical to providing employment opportunities to a vulnerable and largely immigrant workforce is a major intended outcome of the proposed actions. At the

26 DEIS 15.

27 Place-Based Community Brownfield Planning Foundation Report on Existing Conditions – Jerome Avenue Corridor (2015), 10

same time, the extent to which auto and industrial businesses will be impacted is underestimated because of methodological flaws at various points of analysis, including the selection of projected and potential sites, the counting of jobs, and the individualized approach to economic impact that does not take into account the impact of disrupting clusters. As described below, we urge a fairer methodology to analyzing the impacts on the auto and industrial sectors in the study area.

Furthermore, the draft Scope rationalizes the displacement of these specialized businesses that provide well-paying jobs with the idea that general retail development is a better alternative that is currently being stifled under existing zoning. However, the DEIS's own analysis showing an expected increase of 200,000 sq ft of commercial space under the no action scenario contradicts the conclusion that current zoning is stifling the retail sector.

We urge the City to study alternatives to the proposed land use actions that would enhance the opportunities for well-paying jobs in the Jerome Avenue corridor instead of dismantling them. The study area has a staggeringly high unemployment rate of 17%²⁸ and a large population of residents who need access to quality blue-collar jobs. The auto repair and industrial sectors pay far higher wages on average – \$44,000 and \$50,000 per year respectively – than the retail sector, which pays an average of \$24,000 per year.²⁹ As described above, the auto industry is a critical source of quality jobs for people of color and immigrants with limited formal education. The proposed actions and subsequent displacement of auto related businesses will remove the job opportunities provided by the auto sector almost entirely from this area of the Bronx. 80% of auto related businesses within Community Districts 4 and 5 exist within the rezoning area.

Analysis

1. Assessing and describing job quantities and qualities; a more accurate methodology is needed

The draft Scope cites an increase of 1,016 jobs³⁰ as a result of the rezoning over a “No Action” scenario, yet fails to provide reference as to how this number was determined,³¹ what percent of these jobs are expected to pay a living wage and in which sectors, and - assuming this is a net figure - what number and type of job loss it obscures. DCP should disclose the methodology used to create this number, and be transparent about which sectors and wages these new employees are likely to be associated with, and about what can and cannot be known from the analysis.

The City's proposed method for assessing job displacement improperly relies on counts from New York State Department of Labor (NYSDOL) and US Census. The Jerome Ave rezoning geography is far too small for either data set to produce an accurate count of jobs and many of the auto businesses employ workers that would not be represented in official record for various reasons³². Fortunately, the CEQR technical manual explicitly allows for alternatives, stating that the City can use information collected and published

28 Department of City Planning Jerome Ave Neighborhood Profile.

29 NYSBLS Occupational Employment Statistics.

30 DSOW Table 1, Pg 27.

31 A footnote in the document offers calculations for expected resident increase but not worker increase.

32 Workers not on official payroll would not be counted in datasets relying on unemployment insurance.

by local organizations to characterize the employment of businesses in the rezoning area.³³ Department of Small Business Service (DSBS) recently contracted with three local community based organizations (WHEDco and Davidson), to collect detailed data as part of their Commercial District Needs Assessment (CDNA) process. It also contracted with another community-based organization, United Auto Merchant Association (UAMA) to obtain additional critical data about the auto industry in the area. DCP should incorporate this data as well as other primary methods to base their analysis on – instead of data sets that will grossly undercount the workforce. As part of this, the DEIS should analyze the change in the number of auto-related businesses and workers in the corridor since DCP’s initial field study and incorporate those trends into its displacement analysis.

Using data collected through these and other appropriate methods, the City should disclose real job numbers for any businesses identified as being likely to be directly or indirectly displaced by rezoning. Further, the City should explicitly disclose which businesses would be directly or indirectly displaced from rezoning are family-owned and operated versus which are chain store businesses

Development projections are too conservative and the business displacement analysis will not capture actual impacts on auto or industrial businesses.

The draft Scope proposes to measure direct business displacement based on a site-by-site analysis of where DCP projects development to take place. The factors that are considered for determining the projected development sites assume that development occurs in an isolated vacuum. The problems with estimating where there will be new development are described in the section about the RWCDs, but new development is not the only way a business can be displaced on a site. Tenant businesses are particularly vulnerable to the actions of landlords who seek to replace businesses that pay lower rents with ones that pay higher rents, which is often the pattern that is triggered by dramatic changes in land values in an area. The City should take into account a full range of variables when assessing which businesses could be indirectly displaced by rezoning. These variables should include business tenure and whether the business owns or rents.

2. Direct and indirect displacement analysis must take into account the importance of clustering

The CEQR technical manual states that “indirect displacement of businesses may occur if a project directly displaces any type of use that either directly supports businesses in the area or brings a customer base to the area for local businesses”³⁴ and allows for wide discretion for *how* that analysis can be conducted.

There is an important symbiotic relationship that exists between auto retail and auto repair businesses, and among auto related businesses in general; clustering is essential to the survival of the sector. The auto businesses in the rezoning area that are licensed by the Department of Motor Vehicles is one of the most tightly clustered auto corridors in the City. An analysis by the Pratt Center for Community Development reveals that the industry is highly clustered citywide – with half of all DMV shops forming part of 18 main clusters. Of these clusters, Jerome Avenue is the second densest, with the equivalence of 344 shops per

33 Section 5-6, 321.2

34 Section 5-9, 322.2

square mile. It is difficult for auto shops to survive outside of clusters, and as auto shops are displaced clusters are broken up or weakened, a domino effect takes place.

An important element of these auto clusters is the auto retail component. Without the nearby presence of auto repair shops, auto retail becomes barely viable. Therefore, a disrupted cluster has impacts on repair and auto shops.

The City must acknowledge this relationship and employ a methodology that will accurately assess the impact of rezoning on the full Jerome auto economic ecosystem, including the retail component. DCP must include a detailed methodology of how this will be achieved in the Final Scope of Work.

The Draft Scope of Work references that significant adverse impact of direct business displacement will be found if “the businesses to be displaced provide products or services essential to the local economy that would no longer be available in its “Trade area” to local residents or businesses due to the difficulty of either relocating the businesses or establishing new, comparable businesses”³⁵. When assessing the auto industries trade area, the city should consider the auto *cluster* that exists on Jerome Ave as the major driver of commerce and a competitive advantage over other districts due to the concentration and diversity of services and prices. The City must evaluate whether there are other clusters of similar density and diversity, or areas where such a cluster could relocate to within the “trade area”. If not, the city should determine a significant adverse impact.

As described in CEQR there is no established “trade area” that is applicable to all types of businesses.³⁶ Because of the number of auto businesses on the Jerome Ave corridor the trade area should be reflective of the customer base that is attracted to this large cluster. CEQR states that a trade area should be determined by the geography from which the majority of customers or clients of the businesses are drawn. To identify a trade area for the Jerome Ave auto cluster DCP should convene a working group of auto business workers, owners, and industry trade groups as well as local CDC’s to develop a representative trade area of this cluster.

Establishing a trade area for which to evaluate the sector is critical to accurately identifying the size of the customer base that is likely to be impacted by this rezoning. As the auto sector by nature enables more range of businesses for consumers to choose from the trade area for the Jerome Ave auto cluster is likely to be quite large. If a trade area that is too small is chosen to evaluate the auto sector it is likely that full breadth of economic activity created by the Jerome Ave auto cluster will be undercut as well as the impact on consumers from a larger area than just the rezoning geography.

The EIS should evaluate the impacts of displacement of auto workers in the context of citywide trends and the shrinking availability of, and increased competition in, land that is zoned appropriately for auto uses. It should evaluate prospects for relocation by considering actual vacancy rates and the competitive disadvantages that auto related businesses face against other uses that are allowed in C8, M1, M2, or M3 zones that can pay much higher rents.

35 Section 5-6, 321.2

36 CEQRA, Socio Economic Conditions 5-10, 5-4.

3. A comparable area to study indirect business displacement must reflect characteristics of Jerome Ave

CEQR states that a preliminary assessment of indirect business displacement will identify trends that may make it difficult for existing businesses to remain in the area. CEQRA cites trends to include property values that have seen increases in other areas and similarly, rents that have reflected those increases in other areas.

In order to accurately conduct this analysis the city must identify a comparison area that has the following characteristics and disclose all similarities in the Final Scope of Work:

- › Similar public transit access
- › Similar proximity to arterial roads
- › Similar existing building stock and lot sizes
- › Similar existing business composition
- › Similar increase in density under zoning action

DCP has cited Webster Ave as a comparable location to Jerome, but the city must not use Webster Ave as a comparison area to assess indirect business displacement based on increase in rents and property values. Webster Ave does not have the same transit access, proximity to major roads, or increase in density under zoning action as proposed for Jerome Ave and therefore cannot be used as a comparison area.

4. The proposed rezoning does not fit the existing retail landscape of Jerome Ave

Apart from the concentration of auto related businesses, Jerome Ave is a vibrant and active retail corridor with an incredibly diverse range of businesses. DCP has documented these businesses and the building types and sizes that they inhabit in their existing conditions report. Yet, the proposed zoning does not fit the needs of these businesses. As exhibited in the proposed and potential site analysis, the zoning designations encourage the agglomeration of sites into large lots to make housing development attractive. This lot consolidation will increase the floor plates of the ground floor commercial space to sizes likely too large for many of the smaller local retailers whose needs are for small affordable spaces as exhibited on the corridor currently. Developers are more likely to try and attract a single large ground floor commercial tenant than a number of smaller tenants as the single user creates more financial security for the project.³⁷ Further, it is likely that newly constructed commercial space will rent for higher prices than the existing spaces and may be out of reach for many smaller local businesses.

The City should conduct an analysis that would show current land value in existing building conditions versus anticipated land value under fully built out conditions as determined by area rezoning. This analysis should also provide an estimated price per square foot for renters under existing and future conditions since the cost of space is likely to determine what kind of business can exist in the new development.

While the Department of Small Business Services has undertaken a notable initiative in the form of the

37 ILSR Affordable Space, How Rising Commercial Rents are Threatening Independent Businesses, 11.

Commercial District Needs Assessment and subsequent programmatic funding opportunities, this initiative cannot be seen as a mitigation measure for the likely displacement of many small local retailers at any point within the Final Scope of Work or Draft Environmental Impact Statement. The programs offer no security for these businesses against the strong market forces of development that the rezoning will bring to the neighborhood.

5. “Retention Zones” are Insufficient to accomplish their stated goal; alternatives should be studied

The Draft Scope of Work sites that significant adverse impact of direct business displacement will be determined based on business displacement within a discrete trade area where their products or services are not offered by other businesses and whether a category of business is the subject of other regulations or publicly adopted plans to preserve, enhance or otherwise protect it. The draft scope of work references four areas, currently zoned C8 and M1 (heavy commercial and light manufacturing), that are excluded from the rezoning as “retention zones” in order to support the auto and industrial sectors. While factors of consideration that are mentioned include number and types of businesses as well as jobs, the specific goals are not explained, nor is the magnitude of job or business support disclosed that is expected to be accomplished. The Scope should cite the number and type of businesses, and number of workers that this action is aiming to protect, as well as provide a more detailed rationale for how this action fits into the overall impact of the proposed actions.

These so-called “retention zones” are grossly insufficient in size and not protected well enough in the plan to accomplish the stated goal. As such, they cannot be classified as a regulation or policy that will preserve, enhance or otherwise mitigate or reduce the impact of business displacement within the auto sector in any section of the Draft Scope or Environmental Impact Statement. The “retention zones” are not up to the task for multiple reasons:

- They have little to no vacancy - The City’s own analysis shows almost no vacant space within the retention zones to accept displaced businesses. DCP should make explicit their vacancy analysis within the “retention zones”.
- The retention zones - even in their current state - primarily house non-auto or industrial uses. More than 50% of the area in these zones is already occupied by other uses. The draft scope even makes reference to recent gym, restaurant and self-storage developments in C8 and M zoned areas of the study area indicating the permeability of this zoning.³⁸ DCP should make explicit the existing business composition within the “retention zones” including a full count of the number of auto related businesses and jobs that exist in these zones.
- The zones only house a small portion of the Jerome Avenue auto cluster. Just ¼ of the auto businesses in the area actually operate within them.
- The existing zoning designation - without additional protections for auto and industrial uses - is insufficient to protect these businesses against competition from higher paying uses ranging from self-storage to restaurants, which can operate as of right within both M and C8 zones.
- Because the zones are designed to be separated by high density residential development, the

vulnerability of these businesses will increase. This land use pattern makes it unlikely that existing auto uses will be able to survive in the future there due to market pressures and compatibility issues.

Mitigation

To better support the auto and industrial sectors that exist on Jerome Avenue the City should study a range of alternative land use actions. Guidance for how these can be considered appears in the section of these comments that refers to Alternatives. In brief, the City should study and consider options that 1) include the proposed retention areas in the Special District and add protections, 2) expand the retention areas 3) employ creative zoning tools designed for outcomes that generate blue-collar jobs and/or 4) combine these approaches as appropriate.

1. Any potential relocation plan must be well considered and account for the specific locational needs of auto businesses.

The City should provide relocation support for those businesses that are displaced through the rezoning. To do this the City should include in the Final Scope of Work and the DEIS an analysis of vacant, appropriately zoned, and otherwise suitable (correct certificate of occupancy) potentially viable sites for potential relocation, at various sizes, ranging from individual business level to sites that could accommodate a cluster of businesses and/or a vertical arrangement. These should be actual sites in the Bronx and/or Upper Manhattan and the analysis should include an evaluation of factors that rank the locations' viability based on size, proximity to transit, proximity to major roadways, correct certificate of occupancy, or city-owned. Additional input from auto merchants in the area should be incorporated to identify criteria for collective relocation (such as size, distance from original location, building type, distance from transit).

If a suitable location(s) based on mutually agreed upon criteria is identified, the city should sufficiently fund investments in the site and costs of business relocation up front and not as a reimbursement.

2. DCP must use zoning as tool to ensure a diverse range of retailers on Jerome Ave

The City must deploy regulations within the Jerome Ave Special District that ensure the continued viability of small independent businesses that can serve residents at existing income levels in the area. These regulations should include requirements for developers to provide a range of commercial space sizes within large sized lots created through agglomeration. These regulations should be incorporated into the zoning text of the Jerome Ave Special District.

3. The City must expand its understanding of the auto sector in terms of its value, services, and future needs

The City must conduct a study of the auto sector corridors throughout the five boroughs that assesses the real needs of workers and owners and the unique challenges that they face. Absent of an organized policy it is likely that the auto industry will bear the impact of future rezonings as the space they inhabit is seen as "underutilized" when evaluated through the narrow lens of unused FAR and potential for building large scale residential complexes. The study should be advised by a Steering Committee that includes

auto business owners and workers, and conducted by an entity that can fairly value the contributions of the sector to the city as a whole, including the necessary service it provides to consumers and as part of the city's infrastructure system, the entrepreneurship and employment pathways it creates, and economic contribution.

The study should lead to the development of a coherent policy that addresses the sector's current needs, plans for and equips workers and businesses for industry changes, and makes recommendations for citywide land-use policies that address those realities so as to reduce the impact on the auto sector in future rezonings.

As part of a comprehensive alternative to the proposed action, the City should communicate with businesses in collective forums and groupings, recognizing cooperative structures and ensure that local, small businesses can be physically located in and thrive in the new, rezoned area. Ways to accomplish this include:

- Giving preference for return to local businesses. To do this, the City should create a system to offer existing, interested businesses in the proposed rezoning area a "right of first return" or preference in occupying new space(s) created by development. To support this policy, the City must consult with existing small local businesses and craft its zoning plan accordingly, as described at the beginning of this document.
- Limiting increases in rents to no more than 5% in the rezoning area through all legal mechanisms, including requirements on developments that receive public subsidy, and throughout the City through citywide legislation.

IV. Community Facilities

Context

Community facilities such as schools, libraries, and early child care will undoubtedly be impacted by the city's rezoning actions. Adding a substantial new population to the Jerome Ave corridor will further exasperate these already strained facilities lack of capacity. Schools in the rezoning area are already overburdened; many currently use temporary or transportable classroom seats just to keep up with the demand from current students. The addition of a potential 11,000 residents, many of which will be school aged, will make the current environment of overcrowding worse - further impacting the learning environment of existing students.

Further, the CEQR manual fails to study anything apart from the impacts of overcrowding on schools, which is a shortcoming that must be addressed immediately. Students in the area are performing at below standard rates for a number of reasons ranging from sub par teachers to youth homelessness. Investment is needed now to ensure that those attending public schools in the area are given the quality education that they deserve before the city even thinks about adding additional students. In order to fully understand the impact of land use changes on schools CEQR needs to broaden its scope to include other indicators that should be developed in collaboration with students, teachers, community groups, and professionals.

Additionally, the current population projections for expected students, and residents in general, are based on assumptions of the number of projected dwelling units that will be developed under existing MIH options. The Bronx Coalition for a Community Vision has developed its own term sheet that offers deeper affordability levels (see section 2, Land Use and Public Policy) that should be incorporated into the city's DSOW and DEIS. The city should update its population and student projections to reflect the coalition's term sheet which will likely increase the number of children requiring early child care facilities as well as students projected for the area as a result of the rezoning.

Analysis

- The City should evaluate future impact of proposed changes on each *neighborhood*. For each neighborhood that will be affected by the rezoning, DCP and related agencies should create a profile that analyzes and addresses increased demand for community facilities and services that the rezoning will create. Each neighborhood profile should:
 - Explain the impact of a proposed zoning change on housing, schools, parks, transportation, and other facilities and services in the area.
 - Include clear proposals of how and when the future needs will be addressed, with details specific to each neighborhood.
- Schools

- Transportable classrooms and annex buildings are a fact of life in Districts 9 and 10. These facilities are meant to be temporary and the City should not count the school seats in these sub-par facilities when calculating current utilization rates in the DEIS.
 - The City should not take into account school seat capacity within the DEIS for projects under the DOE five year capital plan unless site preparation or construction has commenced for those projects.
 - CEQR’s current criteria for determining if there will be a significant adverse impact on school utilization has a critical flaw. Instead of just requiring that the post-rezoning “target utilization rate” be above 100 to make the determination of a significant adverse impact, it *also* requires that there be an at least 5% increase in utilization rates after the rezoning. Given that schools in this area are *already* overburdened, a post-rezoning target utilization rate of anything over 100 should be enough to qualify a significant adverse impact.
 - CEQR states that only schools that are currently *under construction* can be referenced in the *quantitative* analysis of utilization. However, CEQR does allow potential school seats that are neither under construction nor in the School Construction Authority’s 5-year plan to be considered in *qualitative* analyses. This is risky. School construction projects, like so many other major real estate projects across the City, are complicated, expensive undertakings that are hypothetical until a shovel hits the ground, so the City should not count its chickens before they hatch.
 - The City must expand the CEQR manual to go beyond utilization rates and analyze performance and quality-related metrics when making decisions about impacts on schools. In 2013, 87% of students in grades 3-8 failed to meet grade-level math standards. Many teachers in the area are less qualified than their peers across the City, English language learners often don’t get the resources and support they need, and discipline and suspension are often favored over giving students with challenges the meaningful and constructive support they need.
 - The City should account for the space being consumed by charter schools within public school buildings and increased need for charter school space due to proposed rezoning project and should adjust estimates.
 - The City should take into account input from the CSD Superintendent, local Community Education Council, community education activists and social service and health providers operating in school buildings on the growth patterns in the impacted schools in the study area in both the analysis and mitigation process of ULURP.
 - The City should update its student population projections to reflect the affordability levels offered by the Bronx Coalition for a Community Visions term sheet.
- › General facilities
- The City should take into account space needs of neighborhood anchors that operate *within* schools in addition to the school seats themselves (i.e., Beacon, school based health clinics, etc.).
- › Libraries
- CEQR’s definition of a library catchment area is a simple ¾-mile radius around a library itself. This geography does not take into account significant physical barriers, such as the Cross-Bronx

Expressway, that may make it harder for people of all ages to access a local library. The City must recognize these types of physical barriers and adjust library catchment areas accordingly.

- In the past (e.g., the recent East New York rezoning), the City has claimed no significant adverse impacts in cases when an overburdened library's catchment area overlaps with a catchment area of a library with capacity. Nowhere in CEQR does it state that this is allowed, and this should not be claimed in the case of Jerome Avenue environmental impact review should such a scenario occur.
- The City should expand its library analysis beyond the current holdings-to-population ratio as the only measure of analysis to be used in determining a library's utility.
- The city should incorporate metrics into its analysis that display the services libraries provide in terms of community space and educational access.

› Child care

- In assessing significant impact on childcare facilities, the City should review waitlist information to better understand to what degree which childcare facilities are already seeing more demand than they can accommodate.
- As with public schools, CEQR's current criteria for determining if there will be a significant adverse impact on child care facilities has a critical flaw. Instead of just requiring that the post-rezoning "target utilization rate" be above 100 to make the determination of a significant adverse impact, it also requires that there be an at least 5% increase in utilization rates after the rezoning. Given that child care facilities in this area are already do not meet local demand, a post-rezoning target utilization rate of anything over 100 should be enough to qualify a significant adverse impact.
- The City should update its early child care projections to reflect the affordability levels offered by the Bronx Coalition for a Community Visions term sheet which will produce more children requiring city funded early child care.

Mitigation

The City should analyze, disclose, and adopt mitigation strategies to ensure that community facilities are properly developed and funded, including. The Bronx Coalition for a Community Vision has identified specific policies that could mitigate the impacts on community facilities. These strategies have been outlined in both the Coalition's platform and in letters previously sent by the Coalition to the Department of City Planning (attached as an Appendix), and include: (1) community facility zoning, (2) subsidies and programmatic commitments for new community facilities, (3) a payment in lieu of taxes (PILOT) fund to help support community facility uses, and (4) passage of a Community Benefits Ordinance.

V. Open Space

Because of the public health crisis and high rates of obesity, diabetes, stress, and heart disease in the neighborhoods surrounding Jerome Avenue, ensuring that there is adequate, accessible, quality open space that meets the needs of residents and workers is especially critical. Any impacts that diminish available open space should be mitigated. Unfortunately, there are examples of significant adverse impact being found as a result of rezonings in the Bronx, where mitigations are grossly insufficient or not proposed at all. The methodology in the CEQR manual for calculating impact is complex and flawed. For example, ratios are based on acreage per residents. The special needs of neighborhoods with large youth populations, for example, are not taken into account through this ratio. Additionally, whether an area is well-served, or underserved according to the City's guidelines determines the triggers for performing analyses, but an existing condition of underservice, for example, even if it is worsened by a proposed action does not automatically qualify as a significant adverse impact. This methodology allows for the consistent and repeated chipping away of open space access through land use with requiring mitigation.

Analysis

To determine the worker and daytime population, the draft Scope of work proposes to use the Census Journey to Work Data. As mentioned elsewhere, formal data sets will undercount the employees in the auto sector. The open space analysis for workers should be based on the most accurate data and should take into account the information obtained by field surveying - through direct agency efforts or through subcontracts issued to community-based organizations.

The draft Scope indicates that future development that is anticipated to be completed by 2026 as well as future new open space that is anticipated to be completed by 2026 will be accounted for in the analysis. Without a full listing of the developments in each of those categories that will be included in the analysis, it is impossible for the public to comment on the list and to make additions or comment on the likelihood of development. It is also unclear how DCP will determine which projects are eligible for inclusion.

The qualitative analysis referenced on page 37 should be a participatory process that involves community members in order to ensure that the full range of issues are captured, including limits in access that are created by unsafe roadways and proximity to the Cross Bronx Expressway, and by social and physical factors related to safety.

Mitigation

The CEQR manual's methodology for assessing impact is inadequate. Mitigations should be designed in collaboration with the community to address the issues that they identify.

VI. Shadows

The coalition is concerned with shadows cast from the proposed zoning district alongside the elevated infrastructure of the 4 train where substantial up-zoning has been proposed. The elevated train #6 and Jerome Avenue both run from south to north. Consequently, any new structures exceeding 50 feet in height will cast shadows on train infrastructure during both sunrise and sunset. The shadows cast by these buildings could have significant adverse impacts on neighboring buildings and streets, which could experience significantly less hours of sunlight. This is particularly concerning during the winter months when there is the greatest need for sunlight. Also, 6 community gardens may have shadow impact that might affect the productivity and quality of those open spaces in the community.

Analysis

- The EIS should assess the shadow impact of buildings where zoning has been proposed that will allow structures higher than 50 feet alongside the elevated infrastructure of the train.
- The EIS should include a comparative assessment of shadow impacts between the RWCDs and a lesser build/lesser density alternative, as well as a redistributed bulk alternative.
- Any new structures next to public spaces such as parks, plazas, and playgrounds should be carefully studied by the EIS to determine shadow impacts. Special attention should be paid to the following public spaces located inside of the proposed up-zoning area and the EIS should clearly state how many hours per day the site will be in full or partial shadow for each season:
 - Mullaly Park
 - Keltch park
 - Goble Playground
 - Inwood Park
 - Jerome Playground site
 - Jennie Jerome Playground

Mitigation

There are not enough details on proposed mitigation strategies on the DEIS to address shadow impact on the elevated train infrastructure and the public open spaces surrounded by the proposed rezoning. If shadow impact is found, the city should reduce the height of the adjacent buildings.

VII. Urban Design and Visual Resources

The proposed up-zoning is located less than a quarter mile from the Grand Concourse Historic District. The proposed action is within a unique location that is surrounded by not only historically relevant areas such as the already mentioned Grand Concourse Historic District but also unique characteristics of the multi-family residences towards the Harlem River. The study area for rezoning not only should contextualize with the historic district but also maintain some of the current area character.

The community districts that comprise the Jerome Avenue Rezoning area have a very limited amount of existing public open space. This already has a negative impact on the physical and mental health of community residents. Additionally, the city's estimated increase of 11,788 new residents will have a detrimental effect if no actions are taken to increase the amount of public open space, which is necessary to contribute to a better built environment.

Analysis

- A more detailed assessment of the urban design and visual resources should be included by the city to ensure the new development responds to the unique condition of the surrounded context located in the close proximity that has so much historic value. This should include 3-D studies or photo-simulations showing massing options for the proposed action on the development sites in the following two ways:
 - The newly proposed high-density character in relationship with the existing neighborhood scale context and character in relationship with the Grand Concourse Historic district
 - The newly proposed high-density character in relationship with the elevated infrastructure of the number 4 train.
- An assessment about the need of public spaces that encourage small gathering should be done by the city taking in consideration the current and expected population. Enough access to small gathering space is a pivotal urban design element to make the neighborhood more livable.

Mitigation

- The rezoning should have specific urban design parameters in terms of scale and street front to ease the transition between the adjacent context and the new development.
- Incentives should be provided to increase the availability of small gathering spaces and plaza.

VIII. Transportation

Context

Increased housing and population in the Jerome Avenue corridor as a result of the rezoning will undoubtedly create increased demand for road space, public transportation, and parking. We suggest that DCP incorporate the following comments into the Final Scope of Work to ensure an accurate analysis of these impacts that will lead to appropriate mitigation strategies.

The CEQR technical manual states that projects located near stadiums should have peak periods of travel demand account for game day traffic.³⁹ The Jerome Avenue study area is just north of Yankee stadium and located directly under the 4 train, which provides access to Yankee Stadium. Parking facilities within the rezoning area currently supply spaces for attendees on game days. As such, peak hours for analysis must account for game day traffic for all modes of transportation in the Final Scope of Work and Draft Environmental Impact Statement.

Under the *with-action-scenario*, many existing parking facilities are expected to be developed for housing. The transportation analysis as related to game day peak traffic should account for this loss of parking. As baseball season has recently ended, DCP must disclose an explicit methodology in the Final Scope of Work and Draft Environmental Impact Statement of how it will include game day traffic peak demand estimates in the transportation analysis without ongoing games to assess traffic levels during.

The Draft Scope of Work lists 37 intersections that will be included in the DEIS traffic analysis. However, there is no mention of the on or off ramps of the Cross Bronx Expressway as intersections to evaluate in the traffic study. DCP must include the Cross Bronx exits and on ramps in the traffic analysis as these will be major access points for travel to and from the Jerome Ave rezoning area.

DCP recently released a Cromwell Jerome Ave Transportation Study as a standalone report from the rezoning process. The study focuses on improving safety conditions for pedestrians and cyclists, enhancing pedestrian spaces, increased traffic control measures, and improved connections to transit. The report makes a number of recommendations that work to achieve these goals. However, conspicuously absent from the report is any mention of the impact these interventions may have on the existing businesses in the area. The Jerome Ave rezoning area is currently zoned almost exclusively for heavy commercial or industrial uses. DCP must acknowledge the existence of these types of businesses in their transportation analysis and include an analysis of how loading zones, auxiliary parking, and storage areas will be impacted by both the expected increased traffic in the area and also safety interventions as proposed by the Cromwell Jerome Ave Transportation Study.

39 CEQR 16-19.

The Draft Scope of Work states that parking demand generated by residential growth will be forecast based on auto ownership data for the rezoning area and surrounding area. New housing, as proposed under MIH, that will be constructed in the rezoning area will serve an income bracket far higher than that of current residents living in and around it. These new residents will likely have higher car ownership rates because of their higher income. The city should choose an area that has housing at comparable affordability rates to that of the projected units and should use auto ownership rates in that area as a forecast for parking demand. This comparable area should also have similar expected density, transit access, proximity to major roads, and population to RWCDs residential growth. The Bronx Coalition for a Community Vision is also calling for development that conforms to a term sheet that accomplishes much deeper affordability. The transit and auto ownership patterns for the population in this alternative should also be studied. All of this information should be disclosed explicitly in the Final Scope of Work and Draft Environmental Impact Statement.

Analysis

7.1 Yankee stadium will produce additional traffic that must be accounted for in transportation analysis.

- The city must explicitly state how it will measure the impacts of Yankee Stadium on transportation in the rezoning area within the DSOW.
- The city must include a methodology for how they will analyze the traffic impacts caused by a reduced number of parking lots as a result of RWCDs development on traffic for game days.
- The city must detail their methodology for peak game day traffic in the absence of ongoing league play.

7.2 The intersection analysis must account for traffic going to and coming off of the Cross Bronx Expressway.

- DCP must include the Cross Bronx exits and on ramps in the traffic intersection analysis as these will be major access points for travel to and from the Jerome Ave rezoning area.

7.3 DCP must adjust mitigation strategies to reflect the needs and operations of existing industrial and auto businesses.

- DCP must acknowledge the existence of these types of businesses in their transportation analysis and include a detailed methodology for how loading zones, auxiliary parking, and storage areas that are critical to business operations will be impacted by both the expected increased traffic in the area and also by the safety interventions as proposed by the Cromwell Jerome Ave Transportation Study.

7.3 DCP should choose a more comparable area to evaluate impacts on parking and auto ownership.

- The City must choose areas that have housing at comparable affordability rates to those of the projected units under the alternatives that are studied. DCP should use auto ownership rates in

those areas as a forecast for additional parking demand instead of housing rates in the study area.

- This comparable area should also have similar expected density, transit access, proximity to major roads, and population to RWCDs residential growth. All of this information should be disclosed explicitly in the Final Scope of Work and Draft Environmental Impact Statement.

7.4 Construction will have a significant impact on traffic and transportation within the rezoning area. The Final Scope of Work and Draft Environmental Impact Statement must include a travel demand forecast and traffic analysis for the construction period.

- › The Final Scope of Work and Draft Environmental Impact Statement must include a travel demand forecast and traffic analysis for the construction period. The construction activities associated with the Proposed Actions' RWCDs meet all three criteria required for such an analysis according to the CEQR Technical Manual.⁴⁰
 - The construction analysis must also include peak demand impacts of Yankee stadium game days.

Mitigation

- › It is likely that a Significant Adverse Impact will be found in the transportation section of the EIS due to the large influx of residents and already strained transit network. Any proposed mitigation strategy to address the SAI on traffic taken from the standalone Cromwell Jerome Ave Transportation Study must be revisited as part of the Final Scope of Work and Draft Environmental Impact Statement to evaluate the potential effects these interventions may have on auto and industrial business operations.
- › It should be possible to achieve the goals of the transportation study without adversely impacting industrial businesses in the rezoning area. This balance will require engagement with the business sector. DCP should convene a working group of auto business workers, owners, and industry trade groups as well as local CDC's to develop strategies that will achieve the goals of the Cromwell Jerome Ave Transportation Study without impeding business operations.

IX. Air Quality

According to the most recent Community Health Profiles, the neighborhoods covered in the rezoning study area have higher micrograms per cubic meter of PM_{2.5}, which is the most harmful air pollutant. It is about 10 micrograms per cubic meter in the study area, compared with 9.1 in the Bronx and 8.6 citywide. Additionally, the neighborhoods have existing respiratory health challenges including a higher rate of child asthma hospitalization compared with the city, and higher rates of avoidable asthma hospitalizations for adults compared with the Bronx and the City overall. These respiratory problems are exacerbated by housing conditions for renters, where over 75% of renters in the area have at least one maintenance defect requiring some form of capital repair – compared to about 70% for the Bronx and 60% for the City overall. Major highways – the Cross Bronx Expressway and the Major Deegan Expressway – are included in these areas and also contribute to the existing air pollution challenges in the study area.

Because the study area already includes these related issues of highway traffic and resident respiratory concerns, the coalition requests that DCP adjust Task 14 to reflect the unique circumstances of this study area and ensure that a baseline air quality assessment is undertaken to quantify the existing concerns for residents and businesses. The coalition expects that newly introduced impacts (e.g. increase in the number of vehicle trips on the adjacent highways and local roads due to increase in car owning population), new construction and related pollution impacts, etc. be taken into consideration for an updated assessment.

Task 14 also indicates that only one location will be tested for CO and three tested for PM. The coalition requests that DCP adjust Task 14 to include additional sites given the surrounding highways and existing high levels of harmful PM_{2.5}. Additionally, the coalition requests that DCP provide transparency to community groups on how testing locations are selected. The assessment should focus on the areas adjacent to the Cross Bronx and Major Deegan Expressways as well as recommend mitigation interventions for rezoning and future development.

Analysis

- The CO and PM tested sites should be expanded given the surrounding highways and existing high levels of harmful PM_{2.5} in the neighborhood.
- DCP should provide transparency on the selection of the testing locations.
- DCP should provide an assessment should focus entirely on the Cross Bronx and Major Deegan Expressways.
- DCP should provide an assessment to evaluate the indoor air pollution in the existing housing stock.

Mitigation

- Increase the availability of programs that create awareness, self-management and medical facilities to treat respiratory diseases.
- DCP should work with community groups to make more transparent the selection of the testing location for CO and PM.
- A set of strategic interventions to reduce the outdoor pollution triggers by the Cross Bronx and Major Deegan Expressways.
- Incentives should be provided to upgrade the existing residential stock that is affecting the indoor air quality of low-income residents.

X. Public Health

“There is no excuse for ignoring our experience over the past few decades on the effects of displacement (including homelessness) on the health of the community directly impacted and the community as a whole. The lag in obtaining documented evidence on the relationship between neighborhood redevelopment and the health, education and welfare impacts manifested in displaced families, doubling up, and homelessness, when such massive undertakings such as this rezoning effort takes place should not be a basis for proceeding with such an action since we do know from experience that adverse impacts will emerge over time.”

-Ron Shiffman, city planner and author, Building Together: Case Studies in Participatory Planning and Community Building

According to the DEIS, “a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other analysis areas, such as air quality, hazardous materials, or noise”. However, existing conditions already create public health challenges that should be assessed and combined with an analysis of future impacts to public health as a result of the rezoning.

Kingsbridge Heights, Bedford, Fordham, University Heights, Highbridge and Concourse are the neighborhood that composed Bronx community districts 7, 5 and 4 and are affected by the Jerome Avenue Rezoning; currently, those community face abysmal health inequities with a multitude conditions affecting the health outcome such as, lack of educational and employment opportunities, high crimes rates, prevalence of preventable chronic diseases, lack of healthy food access, incidence of physically and emotionally traumas generated by domestic violence, lack of access to healthcare, among many other issues. According to the community health profile by DOHMM the life expectancy of the neighborhood affected by the re-zoning studies is 79 years compared with 85 years for the Upper East Side residents. Therefore, a comprehensive Public Health assessment should be provided by the city to decrease the social determinants of health.

Also, as discussed in the Air Quality comments, the most recent Community Health Profiles shows that neighborhoods covered in the rezoning study area have higher micrograms per cubic meter of PM_{2.5}, which is the most harmful air pollutant. Also, there are existing respiratory health challenges including a higher rate of child asthma hospitalization compared with the city, and higher rates of avoidable asthma hospitalizations for adults compared with the Bronx and the City overall. Major highways – the Cross Bronx Expressway and the Major Deegan Expressway – are included in the study area and also contribute to the existing pollution challenges in the study area.

Beyond the respiratory concerns, there are several public health challenges that impact existing residents of these neighborhoods when compared to the City and even the Bronx overall. These include

socioeconomic stress of high poverty (40% below the federal poverty level), high elementary school absenteeism (about 30% of students), and higher teenage births.

Additionally, the neighborhoods have a higher smoking rate and consumption of sugary drinks compared with the City overall. Drug and alcohol hospitalization is a concern as well for the study area. There are higher numbers of stroke (380 vs. 320 city-wide), higher HIV death rates (30 vs. 8.4 city-wide), and more psychiatric hospitalizations (800-1000 vs. 680 city-wide).

Given the unique circumstance of this study area, being surrounded by highways, higher rates of respiratory issues for residents, and existing public health challenges as outlined above, the coalition requests that DCP adjust Task 17 to ensure a public health assessment is carried out to determine baseline concerns for existing residents. This should include an assessment of existing healthcare facilities, and mitigation options for current and future development scenarios.

Analysis

- › A public health assessment should be carried out to determine baseline concerns for existing health determinants affecting current residents.
- › Assessment of the availability of health care facilities and programs that tackle the current health disparities.
- › A study to focus on the barrier for a healthy living neighborhood in the existing low-income housing stock.

Mitigation

- › A set of actionable strategies to address the health inequity by tackling the current health determinants.
- › Leverage public funding to increase the availability of health programs.
- › Create incentives to increase community facilities through zoning designation on the study area to provide needed community facilities.
- › Leverage funding to upgrade the existing low-income residential stock to make it more accessible to healthy living.

XI. Neighborhood Character

Analysis

10.1 The City should exercise its discretion to perform a detailed analysis of the impact on neighborhood character if any significant impact is identified in one of the technical areas that contribute to the neighborhood's character, or if DCP finds only moderate effects (as opposed to significant impacts) in several of the relevant analysis areas.

Under the standards in the CEQR Technical Manual, performance of a neighborhood character impact assessment is generally dependent on a finding of significant impact in another task area. But the Manual states that, “a significant impact identified in one of the technical areas that contribute to a neighborhood’s character is not automatically equivalent to a significant impact on neighborhood character. Rather, it serves as an indication that neighborhood character should be examined.”⁴¹ Given the tremendous risks of displacement that exist in our community today and the possibility that the proposed rezoning will exacerbate those risks, the Coalition demands that DCP perform a neighborhood character impact assessment if a significant impact is found in *any* task area.

We further demand that the City conduct a neighborhood character assessment “even if the proposed project would not have a significant impact on any one defining feature of the area ... [if] the project may have moderate impacts on a number of defining features that, cumulatively, [could] result in a significant impact on the neighborhood character.”⁴² Although the Manual provides the caveat that, “Only under unusual circumstances would a combination of moderate effects to the neighborhood result in an impact to neighborhood character, in the absence of an impact in any of the relevant technical areas,”⁴³ we believe that this massive action, unprecedented in our community, represents an “unusual circumstance” that demands a detailed neighborhood character impact assessment.

10.2 The City’s Analysis of Neighborhood Character Must Go Beyond the Area’s Physical Characteristics and Include an Assessment of the Impacts on the Socio-Economic Character and Demographics of the Area

DCP must go beyond an analysis of *physical* impacts and also look at *socioeconomic and demographic* impacts in its analysis of neighborhood character.

The Jerome Draft Scope states that, “The character of a neighborhood is established by numerous factors, including land use patterns, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other *physical features* [emphasis added] that include traffic

41 “Neighborhood Character,” CEQR Technical Manual (2014), Ch. 21 at 21-1.

42 Id. Sec. 400.

43 Id. Sec. 400.

and pedestrian patterns, noise, etc.”⁴⁴ However, this definition does not comport with what is in the CEQR Technical Manual, which defines neighborhood character as “an amalgam of various elements that give neighborhoods their distinct ‘personality.’ These elements *may* [emphasis added] include a neighborhood’s land use, urban design, visual resources, historic resources, *socioeconomics* [emphasis added], traffic, and/or noise.”⁴⁵

It is clear that the definition of “neighborhood character” is broader than the City’s summary of that definition suggests. First, the analysis need not be limited to the enumerated task areas; neighborhood character “may include” those task areas, but *and* any element that gives the neighborhood a “distinct ‘personality.’”⁴⁶ Second, the analysis is not limited to physical characteristics; the Manual expressly includes “socioeconomics,” i.e. all factors addressed by the socio-economic conditions chapter, as a component of neighborhood character. Therefore, DCP must analyze any changes to the socio-economic character of residents and displacement of either residential or business uses as part of the neighborhood character analysis. Third, although an analysis of racial and ethnic composition is not expressly required, it is also not expressly precluded, and the Manual suggests that a neighborhood’s demographic characteristics are also relevant to an assessment of its character.⁴⁷

The City should adopt a comprehensive approach to the neighborhood character analysis that looks at potential changes in the racial, ethnic, and socio-economic diversity of the community - specifically, the impact of the proposed rezoning on people of color, immigrants, and low-income people. This approach was affirmed in *Chinese Staff & Workers Association v. City of New York* (1986)⁴⁸, where the Court of Appeals confirmed that

the impact that a project may have on population patterns or existing community character, with or without a separate impact on the physical environment, is a relevant concern in an environmental analysis since the statute includes these concerns as elements of the environment. That these factors might generally be regarded as social or economic is irrelevant in view of this explicit definition. By their express terms, therefore, both SEQRA and CEQR require a lead agency to consider more than impacts upon the physical environment in determining whether to require the preparation of an EIS. In sum, population patterns and neighborhood character are physical conditions of the environment under SEQRA and CEQR regardless of whether there is any impact on the physical environment . . .”⁴⁹

Although New York courts have, in subsequent decisions, rejected several legal challenges that cited the *Chinese Staff & Workers* case in arguing that the agencies in question were required to give greater

44 Draft Scope of Work for an Environmental Impact Statement: Jerome Avenue Rezoning (CEQR No. 17DCP019X) at 56.

45 “Neighborhood Character,” CEQR Technical Manual (2014), Ch. 21 at Sec. 100.

46 *Id.*

47 *Id.* at 21-1. (Describing forces other than Proposed Actions that may shift a neighborhood’s character, including “shifts in demographic patterns”)

48 68 N.Y.2d 359 (N.Y. 1986).

49 *Chinese Staff & Workers*, 68 N.Y.2d at 366.

consideration to socio-economic issues in the CEQR review process,⁵⁰ none of these cases disturbed the fundamental holding of that case: that review of socio-economic impacts, including “population patterns,” is required under CEQR.⁵¹ In addition, these cases in no way limit DCP’s discretion to perform the specific sorts of analyses we are seeking – i.e. potential changes in the racial, ethnic, and socio-economic diversity of the community, and impacts on people of color, immigrants, and low-income people in particular.

10.3 Rent-Stabilized Housing, the Presence of the Auto Industry, and the Area’s Existing Racial, Ethnic, and Socio-Economic Diversity Must Be Considered “Defining Features” of the Neighborhood

- As part of its preliminary assessment, DCP is required to enumerate the “defining features” of the neighborhood. The Manual provides as an example “For instance, the analysis may consider whether a particular housing type, such as rent-stabilized housing, serves to define the socioeconomic character of an area. The displacement of a large amount of this type of housing from the area may potentially affect neighborhood character.”⁵²
- The Coalition demands that (1) the presence of a significant amount of rent-stabilized housing, (2) the auto industry, and (3) our area’s existing racial, ethnic, and socio-economic diversity be considered “defining features” of the neighborhood and analyzed accordingly.
- Rent-Stabilized Housing: As we have described in the sections above, rent-stabilized housing forms the backbone of affordable housing in our community, and we do not want the City to disregard these homes in its rush to transform our neighborhood. Importantly, the *existing* rent-stabilized housing must be considered a “defining feature” of our neighborhood, and if the City anticipates a loss of *existing* rent-stabilized housing resulting from direct and indirect displacement pressures, it should consider that to be a negative impact on neighborhood and develop appropriate mitigation strategies to address that impact. Simply creating new affordable housing would not be enough to mitigate negative impacts on existing rent-stabilized housing, because it will not protect the individuals and families at risk of displacement, many of whom have lived in the community for decades or generations.
- The Auto Industry: As the Jerome Ave rezoning area is a well known and utilized commercial corridor, an analysis of neighborhood character must account for the businesses, who are the majority of tenants on the avenue, contribute to the personality and character of the area. As described in the comments related to business displacement, Jerome Ave is one of the densest clusters of auto businesses in the city and this unique characteristic must be included as a recognized defining feature of the area’s neighborhood character. As part of its analysis of impact on physical characteristics of the neighborhood, DCP should analyze effect of rezoning corridors from M and C8 to high-rise R. This will significantly shift character of those areas, to the detriment of the existing auto industry.

50 See, e.g., *Chinese Staff & Workers’ Association v. Burden*, 88 A.D. 3d 425, 428–30 (N.Y. App. Div. 2011) (rejecting petitioners’ argument that DCP’s EAS “failed to adequately analyze CEQR technical areas such as neighborhood character and socioeconomic impacts”), *aff’d* by 19 N.Y.3d 922 (N.Y. 2012).

51 See, e.g. *Wellsville Citizens for Responsible Development, Inc. v. Wal-Mart Stores, Inc.*, 140 A.D.3d 1767, 1770 (N.Y. App. Div. 2016) (granting environmental group’s petition to annul Town Board’s resolution adopting a negative declaration pursuant to SEQRA because the Town Board “failed to take a hard look” at the impact of a proposed retail store construction project on the community character of a neighboring village).

52 “Neighborhood Character,” CEQR Technical Manual (2014), Ch. 21 at Sec. 320.

- › Racial, Ethnic, and Socio-Economic Diversity: The areas impacted by this rezoning have high levels of racial and ethnic diversity today. The Census tracts along the Jerome Ave corridor are 1.5% White, 26.1% Black, 2.4% Asian, 68.5% Latino, and 1.6% other. No census tract along the Jerome Ave corridor has over 90% any one race. In contrast, there are 133 census tracts in the City that are at least 90% 1 race.⁵³ We value the racial and ethnic diversity we enjoy in our community today and feel it is critical that the City consider the specific impacts of its actions on the diverse groups that call the Bronx home. The community is also socio-economically diverse. In numerous settings, the City has stated or implied that our neighborhoods are not economically “diverse” because they do not include enough high-income people. We disagree. The median income for a family of four in CBs 4 and 5 is about \$25,000, but close to 25 percent of households make above \$50,000 and 15 percent make above \$150,000.⁵⁴ Higher-income people can already afford to live in the community if they so choose, and it is not necessary for the City to socially engineer our neighborhoods to include wealthier people. Instead, it is critical that the rezoning plans for this area prioritize the creation of housing affordable to lower-income people, many of whom are overcrowded or severely rent-burdened today, to ensure that our neighborhoods remain socio-economically diverse in the long term.

10.4 DCP Must Analyze and Disclose the True Impacts of the Proposed Rezoning on Neighborhood Features Addressed in the Socio-Economic Conditions Chapter in Order to Accurately Assess Impact of the Proposed Actions on Neighborhood Character

- › If the City improperly limits its analysis with the relevant task areas, including socio-economic conditions, the neighborhood character assessment will also be off. Therefore, we demand that the City conduct the more rigorous analyses of each task area we have described in the relevant sections so as not to improperly downplay impacts on neighborhood character - especially the auto industry, existing rent-stabilized housing, socio-economic diversity, and racial and ethnic diversity, as described above.
- › Rent-Stabilized Housing is a key component of the socio-economic conditions chapter. By improperly limiting the analysis of displacement from rent-stabilized housing in the socio-economic conditions chapter - including, as discussed more fully in our response to that chapter, by limiting the analysis of rent-stabilized housing to legal displacement tactics, and by excluding numerous potential soft sites in its analysis of direct displacement - the City is likely to conclude that the threat to rent-stabilized housing is less than we know to be true, which will also improperly limit the reported impact of loss of rent-stabilized housing on neighborhood character.
- › The Auto Industry: Similarly, the city’s proposed analysis of the rezoning’s impact on the auto sector is insufficient as described thoroughly in the response to business displacement. Without an analysis of data sets that will accurately display the number of jobs and businesses represented by the auto cluster on Jerome the city’s findings will be a misrepresentation of the potential impact this rezoning will have on the community.
- › Racial, Ethnic, and Socio-Economic Diversity: In our response to the Socio-Economic Conditions task, the Coalition has requested that the impact of the rezoning on certain vulnerable groups,

53 U.S. Census Bureau; American Community Survey 3-Year Estimates, 2014.

54 Susanna Blankley, “Four Wrong Ideas Driving de Blasio’s Housing Plan,” *City Limits* (Fe. 25, 2016). Online at citylimits.org/2016/02/25/cityviewsfour-wrong-ideas-driving-de-blasios-housing-plan/.

including low-income populations, people of color, and immigrants be analyzed and disclosed. Performance of that analysis is also critical to inform the neighborhood character analysis.

Mitigation

10.5 DCP Must Take Into Account the Community's Strong Preferences for Deeply Affordable and Rent-Stabilized Housing, the Preservation of the Existing Auto Industry, and the Area's Existing Racial, Ethnic, and Socio-Economic Diversity in Assessing the Meaning of Potential Changes to Neighborhood Character

- The Technical Manual expressly acknowledges the question of whether changes to a neighborhood's character are negative or positive are extremely subjective. Per the manual, "As with other technical areas, significant impacts on neighborhood character may be either beneficial or adverse. Because a neighborhood's character is perceived and contextual, this judgment may be more subjective than in other technical areas. For example, a new and modern apartment building in an older neighborhood may be perceived as an improvement by some, but as out of context and adverse by others. The lead agency should consider comments made during public review in making such a determination as to which significant impacts are adverse and require mitigation."⁵⁵
- Affordable Housing: Given the overwhelming support for deeply affordable housing and against luxury development expressed by those who testified at the Draft Scope hearing, DCP must regard any reduction in the amount of existing affordable (including rent-stabilized) housing, or creation of market rate or luxury housing, as significant *negative* impacts on the community. The City may believe that the introduction of luxury housing into our community would be a positive impact; we do not, and as the CEQR manual requires DCP to take the lead from the community on such matters, DCP should not substitute its own opinion about "what is best" for this community with the community's clearly expressed preferences.
- The Auto Industry: Community members at the Draft Scope hearing and other forums have made numerous comments in favor of the preservation of the auto industry along Jerome Avenue. Therefore, any threats to or reduction of the auto industry should also be regarded as negative impacts on neighborhood character.
- Racial, Ethnic, and Socio-Economic Diversity: The community has made clear its preference that our area remain accessible to lower-income and working-class people, people of color, and immigrants. Any threat of displacement of these populations must therefore be regarded as a negative impact.

10.6 DCP Must Disclose, Analyze and Adopt Mitigation Tactics to Address Negative Impacts on Neighborhood Character That May Not Be Adequately Addressed by Proposed Mitigations in Other Analysis Areas

- In developing mitigation tactics to address negative impacts on neighborhood character, the City should be mindful that mitigation tactics for the other impact areas do not necessarily reduce negative impacts on neighborhood character, and mitigation measures specifically to address such character may be required.
- Rent-Stabilized Housing: As described below, the creation of new affordable housing, though a critical goal, is not sufficient to mitigate the loss of existing rent-stabilized housing in the community today. Therefore, the City must adopt additional mitigation strategies for the specific purpose of preserving today's rent-stabilized housing.

55 Id. Sec. 400.

- The Auto Industry: The City cannot include the so-called retention areas as designated in the Draft Scope of Work as adequate mitigation strategies to address the significant impacts the auto sector will be subject to as a result of the rezoning. As described in responses to both the business displacement and alternatives sections, these retention areas must be included in the Jerome Ave special district and assigned limited use groups, expanded to be sufficiently sized to protect a significant portion of the auto industry, and made continuous so as not to allow pockets of high density residential in between cluster areas.
- Racial, Ethnic, and Socio-Economic Diversity: As the CEQR Technical Manual explains, “In [some] situations ... mitigation measures may alleviate significant adverse impacts in other technical areas, but significant impacts on neighborhood character may remain ... [One] example is a project that may result in both significant adverse socioeconomic impacts related to secondary residential displacement and a related significant impact on neighborhood character because of the change in the area’s population profile. The socioeconomic impacts may be mitigated by finding affordable housing for displaced residents, but if the residents move out of the neighborhood, the significant impact on the neighborhood’s character still occurs. If mitigation measures presented for the project’s other significant adverse impacts, if any, would not mitigate neighborhood character impacts, other mitigation measures are to be identified where feasible.”⁵⁶ Even if the City manages to create affordable housing within the community that is sufficient in number to meet the needs of and reflective of the incomes of the residents most likely to be displaced - which nothing in the City’s current plans, programs, or term sheets suggests will be the case - the rezoning will *still* have a negative impact on the character of the community if residents are displaced from their current homes and are unable to get access to the new affordable units within the community. Therefore, the City must assess the extent to which *today’s* community residents will be able to remain, and develop appropriate mitigation strategies - including the adoption of a Certificate of No Harassment requirement, passage of Right to Counsel, and the creation of an Anti-Displacement Task Force to devise further solutions to prevent displacement and preserve the racial, ethnic, and socio-economic diversity of our community, including a significant share of low-income households.

XII. Construction

Task 19 currently states that the areas of Transportation Systems, Air Quality, Noise, and Other Technical Areas will be assessed only if the preliminary assessment indicates the potential for significant impact during construction. Given the typically long duration of large construction projects and the impact they will have for pedestrian safety, access to public amenities, noise, and disruption for businesses and students/teachers in adjacent schools, the coalition requests that Task 19 be adjusted to require a construction impact analysis with a focus on resident satisfaction needs, environmental, and economic impacts.

Socioeconomic factors related to construction should be highlighted in the assessment. Topics should include, but not be limited to, existing business activity, the impact construction (especially large multi-site projects in the study area) will have on local business activity, the impact neighborhood disruptions will have on schools and outdoor recreational facilities, and provide an understanding of local resident training, business capacity building, and hiring requirements that contractors will be obligated to.

Given the health profile of the existing community, it is important that an assessment look at the impact construction will have on existing social service infrastructure. This includes disruptions to utilities, installation of new utilities (e.g. sewer and water mains), and ensuring that interagency coordination is a priority so that existing residents have a voice in long-term projects and their needs are met.

Analysis

- An assessment of the impacts in study area that the proposed actions will have on pedestrian safety, access to public amenities, noise, and disruption for businesses and students/teachers in adjacent schools, outdoor recreational facilities, and provide an understanding of local resident training, business capacity building, and hiring requirements for contractors.
- A deeper study to tackle the impact of projected population growth on disruptions to existing utilities, the installation of new utilities (e.g. sewer and water mains), and ensuring that interagency coordination is a priority so that existing residents have a voice in long-term projects and their needs are met.

Mitigation

- A set of interventions and strategies that will allow the neighborhood to function during the construction process. Also, the provision of the required infrastructure for the expected growth in the neighborhood.

NYC is in the midst of a construction boom and inadvertently there has been an increase in construction accidents and fatalities. Although there is a correlation between the rise in construction activity with an increase in construction accidents, these preventable accidents have outpaced construction activity at an alarming rate. The administration has the responsibility of ensuring all workers and pedestrians

are protected from low-road contractors who put profits over safety and proper training. To protect the workforce and the neighboring community, the City must act now to rectify the current rise in construction related fatalities and life changing injuries. We request that the City consider the following strategies as mitigations to construction-related impacts:

- › HPD Procurement Reform. The city must attach standards to the procurement process to ensure taxpayer funded projects are awarded to contractors with a track record of labor law and OSHA requirement compliance. Details about our proposal are attached as Appendix C.
- › Subsidy Reform. Recipients of economic development subsidies must be held accountable to ensure they are truly benefitting the public and not just the businesses and corporation who receive them. Safety, labor and wage requirements must be attached to all city subsidies.
- › Department of Buildings (DOB) Reform.
 - *Improve DOB oversight and investigations of worker injuries and fatalities.* DOB's record keeping on construction related fatalities and injuries should mirror efforts by OSHA in order to collectively address safety violations.
 - *Increase DOB penalties for accidents and fatalities.* If a contractor is found to be responsible for a death on a construction site, the fine to the contractor is approximately \$7,600. Because the fines are significantly low, contractors see them as the price of doing business. The City must impose higher fines to deter contractors from not complying with OSHA and DOB requirements.

XIII. Mitigation

DCP should disclose, analyze and adopt a broad range of mitigation strategies to address the impacts of the rezonings. We request that DCP analyze and adopt the full range of mitigation strategies we have proposed throughout this response, as well as the broader range of ideas we sent to DCP in our correspondence earlier this year (which reflects the full platform of the Bronx Coalition for a Community Vision).

The following are the mitigation strategies that the Coalition views as especially critical to the success of this rezoning:

- › Anti-Displacement and Anti-Harassment Policies for Residential Tenants:
 - Pass and Fund Intro 214, providing a right to counsel for all tenants facing the loss of their home in NYC
 - Pass and fund Intro 152-A, which would create citywide “Certificate of No Harassment” requirements, which must be in place before the Jerome Ave ULURP applies.
 - Create an Anti-Displacement Task Force, with regular meetings between local community organizations and HPD to discuss strategies for preservation.
- › Anti-Displacement for the Commercial Tenants and Auto Workers on Jerome Ave:
 - Select an area in the proposed rezoning area where auto-related businesses— including auto parts, security and audio stores—can remain and be protected.
- › Good Jobs and Local Hire:
 - Provide Job Training & Education to local residents, so that residents are eligible for the state approved apprenticeship programs.
 - Make local hire a requirement of all projects that the City subsidizes. As explained more fully in the sections above, the new term sheet developed by the Coalition accounts for construction costs reviewed and approved by the building and construction trades and would promote safe, career-oriented union jobs.
- › Real Affordable Housing:
 - The City should adopt the new term sheet proposed by the Coalition to ensure that new housing better reflects the needs of current neighborhood residents, including rent levels affordable to the current community and local jobs.
- › Real Community Engagement:
 - Give residents a seat at the decision-making table and a chance to vote.
 - Create an affordable housing taskforce open to all local residents who want to work with officials

to figure out how much affordable housing there should be, and at what rent levels. Those principles could then guide the plans.

- Create a formal opportunity for community oversight of the plan going forward. In order to ensure that the commitments that are made by the City are actually upheld, we believe that the City needs a comprehensive and coordinated approach to documenting, monitoring, overseeing and enforcing all public and private commitments made during the rezoning processes. This approach should include a citywide and a neighborhood-based, community-led component and should build off and fill the gaps of the various proposals put forth by the City, including Intro 1132. We believe that a specific mayoral office is needed to provide overall agency coordination, oversight and accountability for the implementation of commitments made to communities during the rezoning process. We also propose that neighborhood monitoring committees be established to ensure that any commitments made during a rezoning process are implemented, and support community priorities. Community members must be able to continue to participate in the monitoring and decision-making related to the changes in their neighborhood. We further propose that the new Mayoral office work in close coordination with neighborhood monitoring committees to create goals and benchmarks for each rezoned neighborhood, based on the community's stated priorities and commitments made in the zoning plan. The office should then conduct ongoing assessments for each rezoned neighborhood to track progress towards goals and benchmarks and neighborhood change over time. The office could also track the funding status for all commitments made during the rezoning process and ensure projects are completed on a clear timeline, and in consultation with neighborhood monitoring committees. This comprehensive oversight proposal, which was developed by a citywide coalition of groups from most of the rezoning communities, including stakeholders such as CASA, is attached as Appendix D.

XIV. Alternatives

As described above, the proposed actions betray many of the community's clearly expressed goals for the areas.

At the same time, it is unclear whether the proposed land use actions will satisfactorily accomplish DCP's own stated goals⁵⁷ in the best way possible. For example, the goals for the area include "support auto-related businesses" and "promote and support small businesses and entrepreneurship." Similarly, the objectives of the proposed land use actions include "preserve zoning for heavy commercial and light industrial uses in areas to support mixed uses and jobs" and "establishing [zoning] controls...to ensure consistency with the goals and objectives of the rezoning."⁵⁸ The proposed actions in their current form will not accomplish these goals, for the reasons described in the business displacement section.

As already described in detail, the proposed actions do not meet the needs for housing in the surrounding neighborhoods.

For these reasons, we encourage DCP to analyze multiple alternatives that have the potential to better accomplish the stated goals or to achieve a more appropriate balance among the stated goals. Below we include a range of possible alternatives that DCP should analyze. To ensure a fair and genuine discussion, alternatives that encompass all the major concepts below should be analyzed.

To better achieve the stated goals the City should study a range of alternative versions of the retention zones and residential zoning coverage, including:

- Including any proposed retention areas inside the Jerome Avenue special district to enable heightened protection mechanisms, such as a restriction of allowable use groups to minimize competition for industrial and auto related businesses. Restrictions on uses with regard to transient hotels are already being proposed as part of the Special District, so the introduction of additional controls to accomplish the stated goal of supporting auto businesses is consistent with

⁵⁷ The draft Scope cites the following goals for the JANP (page 5) of which the proposed land use actions are intended to support:

- Provide sustainable, high-quality, affordable housing with a range of options for residents at all income levels.
- Protect tenants and improve housing quality.
- Ensure every neighborhood has green streetscapes, quality parks and diverse recreation spaces.
- Create greater retail diversity to meet current and growing retail and service needs.
- Prepare residents for job and career growth through job training and skills development.
- Promote and support small businesses and entrepreneurship.
- Support auto-related businesses.
- Promote a safe, walkable area in and around the elevated train.

DCP's approach here. Use groups outside of 7,11,16,17 should be considered for exclusion from as of right development within the retention zones. Because including retention areas *inside* the proposed boundary would technically be an enlargement of the area (albeit resulting in a lesser environmental impact if included as above) this alternative must be included in the final scope of work and studied if it is to be eligible for consideration later in the process.

- Expanding the area(s) intended for retention to be continuous so as to promote consistent clusters of business activity without introducing conflicting residential uses and heightened market forces. While not an exclusive list, potential alternatives for expansion of retention areas that should be studied might include any or all of the following:
 - Creating continuous retention areas on both sides of Jerome Avenue between 177th and the Cross Bronx Expressway
 - Including the area south the of the Cross Bronx Expressway to 168th Street in a retention area
 - Connecting the proposed two southernmost retention areas south of the Cross Bronx Expressway by extending them across 170th Street along EL Grant Highway, Inwood, and Cromwell Avenues
- Creating additional retention areas where significant numbers of auto businesses would be protected. While not an exclusive list, potential alternatives for expansion of retention that should be studied might include any or all of the following:
 - Creating a new retention area on the East side of Jerome Ave between 177th and the Cross Bronx Expressway.
 - Proposals for retention areas anywhere throughout the proposed zoning area that are linked with specific job or business retention goals
- Include more innovative land use proposals designed to strengthen the capacity of the area to generate quality blue-collar jobs. The proposed actions do not fully exploit the opportunity of land use actions to maintain and spur job growth in sectors that residents in the area sorely need.
 - A holistic vision for growth of the auto and manufacturing sectors in this area and ways that it might modernize and co-exist alongside residential uses through balanced mixed-use measures has not been offered. Land use proposals that advance a cohesive, employment-centered vision for the area would be a welcome response to the needs expressed by community members and workers in the area.
- Rezone a smaller area / fewer lots, but permit greater residential upzoning on those lots. This alternative could potentially achieve the same number of new construction residential units (approximately 4000) without creating as much displacement pressure on existing automotive and residential uses.
- Reduce the total amount of residential upzoning to match the amount of affordable housing the City believes can realistically be created in the area within the next 5-10 years given the limits of the City's capacity to move projects through the subsidy pipeline and likely disinterest of developers in accepting such subsidies after the local housing market has strengthened.

Each of the alternatives described above could potentially do more to advance the goals of affordable housing preservation and protection of the existing auto industry than the current plans proposed by the

City. We request that the City analyze and disclose the impacts of these Alternatives to help the community better weigh the range of possible options for the future.

XV. Conclusion

The City has made much of its efforts to engage community residents in the creation of the Jerome Avenue Neighborhood Plan and Proposed Actions. But on too many occasions, the City has cut short or discouraged community participation in this process and the formulation of its plans. For example, we are glad to see that DCP created a Spanish language copy of the Draft Scope of Work for monolingual Spanish speakers who might be interested in reading it. But in many early meetings in this process, interpretation and translated materials were not provided. In addition, even at the Draft Scope hearing, interpretation was provided from Spanish to English, but not English to Spanish. This meant that although monolingual Spanish speakers could testify in Spanish, they could not understand all of the testimony delivered in English or fully understand what was happening unless another community member interpreted for them. This is extremely disrespectful in any community, and especially one where for so many residents Spanish is their first or only language. The Draft Scope hearing was also held at an inaccessible venue that is up a steep hill, confusing to access and far from mass transit. Because of Bronx Community College's security restrictions, many community members were forced to wait outside of the venue for hours before they were able to come in and testify. Some ended up needing to leave before they could testify. When people arrived at the security checkpoint, they were also treated differently, with people who showed up in a group being subjected to more extensive security checks than those who appeared to have arrived alone. In addition, the heavy security and police presence at the event - which, in our opinion, far exceeded what was necessary - may well have deterred community members who feared negative interactions with the police. Although many of these restrictions may have been imposed by BCC rather than DCP, to make this an accessible process, the City should ensure that venues for future hearings are also accessible. For example, Rent Guidelines Board hearings are typically held at the Bronx Museum, a far more centrally located venue with fewer security restrictions that might deter participation at the outset.

Importantly, listening to residents also requires more than simply receiving their feedback on plans already created by the powers that be. As resident at the Draft Scope hearing said, "I don't want you to go back to your office tomorrow and say that you went to the hearing and did your job because you went to the community and listened to the people, then pass a rezoning that's not what this community wants." Real community engagement means crafting plans that are responsive to residents' needs and inclusive of the ideas they have proposed.

At present, the Proposed Actions do not achieve these goals, and have left the hundreds of residents who participated in the formulation of platform the Bronx Coalition for a Community Vision with the sense that the City simply does not care what they think or need. CASA leader Fitzroy Christian spoke powerfully about this at the hearing:

You deliberately dismissed our communities' ability to be full partners in the proposed upzoning and redevelopment of our neighborhoods. And even when you were presented with a community driven vision, showing how the redevelopment can happen without the painful and unnecessary

displacements, dislocation of families, destruction of communities, you contemptuously disregarded it. And us...

Another CASA member, Madeline Mendez, emphasized how the proposed affordability levels of new housing under the rezoning made it clear that the rezoning is not intended to benefit members of this community:

This 'affordability' is for the middle class and for the upper class ... All this 'affordability' is not for me, and it's not for my people, and my neighborhood ... People need a place to live. They need an auto mechanic job. I don't need to tell you what our community needs, because I already told you what our community needs, so I don't need to repeat, and don't act like you don't know.

By ignoring the goals the community has set forth, the City is missing out on a critical opportunity for collaboration and true partnership. As another woman at the hearing testified:

Many of the people in this room have been going to meetings about this for 18 months. We've sent you recommendations based on 4 principles, and I don't really see them in the report ... Truly affordable housing, good jobs with local hire, protections against displacement, and real community engagement in figuring out what these plans should be. We're not really an 'against everything' kind of groups. There are a lot of people in this room who would be for the rezoning plan, if it were for the people in this room. We would work with you. But if it's not, we will do everything in our power to shut it down.

At present, what the City has put forward is not a “neighborhood plan”—it runs through multiple different neighborhoods and does not address the needs of any of the neighborhoods impacted. It is not an affordable housing plan, since DCP can neither create affordable housing nor guarantee what developers will build and since the City’s best tools to leverage the private market for affordable housing, leave out 78% of neighborhood residents. It is not a jobs plan, since there are no provisions for local hire, worker safety or wages for the close to 4,000 construction jobs the plan will create and since it will most surely displace the more than 1,000 largely Dominican and immigrant auto workers and business owners.

To City must create time and space for the formulation of a plan that meaningfully addresses the goals the community has created, refined, and advocated for in countless meetings, rallies, forums, and other events over the last 18 months. As Mr. Christian stated at the hearing, “You need to slow the process down, stop this mad rush to the deliberate destruction of families and communities, and work with us to develop a plan that will benefit those of us who are here now, and who intend to stay, as well as others who may come later ... You have to slow it down. And let us do it right. Together.” As part of this, the City must work to pass the numerous citywide reforms we have proposed - including Right to Counsel, a citywide Certificate of No Harassment Requirement, a new subsidy term sheet to create deeply affordable housing and local jobs, and passage of an oversight bill to guarantee that the commitments made in the rezoning are kept. Without these broader reforms, both the members of our community and lower-income and working-class people in the many other neighborhoods the City is rezoning will continue to be at risk of displacement, homelessness, and chronic underemployment.

We urge the City to delay ULURP certification until these citywide reforms are passed and both the environmental review process and a revised Jerome Avenue Neighborhood Plan have been completed. It is inappropriate to consider such a large land use action in the absence of the a completed Jerome Avenue Neighborhood Plan. To fully understand and evaluate the combined impact of simultaneous actions, all the proposed actions and planning initiatives should be disclosed at the same time. For similar reasons, certification for ULURP for the proposed Jerome Avenue rezoning should not take place until the environmental review process has been *completed* for the revised plan we are proposing. Adopting this strategy will permit each entity involved in the review and approval process to understand the full and true impact of what they are voting in favor of, or against. Likewise, each entity can more adequately consider appropriate mitigating approaches to anticipated negative impacts.

We believe that development without displacement is not only possible but necessary. We created a set of policy recommendations for the city to implement, none of which have been implemented. We believe the current plan is about relocation, gentrification and displacement. We say no to the plan and yes to the Bronx.

XVI. Appendices

Appendix A: Right to Counsel

Appendix B: “Certificate of No Harassment” Legislation Summary

Appendix C: Ensuring Responsible Contracting: HPD Procurement Reform

Appendix D: Comprehensive Oversight Proposal

Appendix E: Coalition Zoning Text Proposals

Appendix F: Proposed Term Sheet for Deep Affordability

Appendix G: Miscellaneous Citation Issues in the Draft Scope of Work

- › There is an error on page 6 that refers to Grand Concourse as the western, not eastern boundary.
- › There should be a map of the No-Action development scenario.
- › On page 7, the boundary and data source for the 345,000 residents is not given.

\$320 Million Saved Every Year: **Highlights of SRR's Cost/Benefit Analysis for Intro 214-A**

By the Right to Counsel NYC Coalition

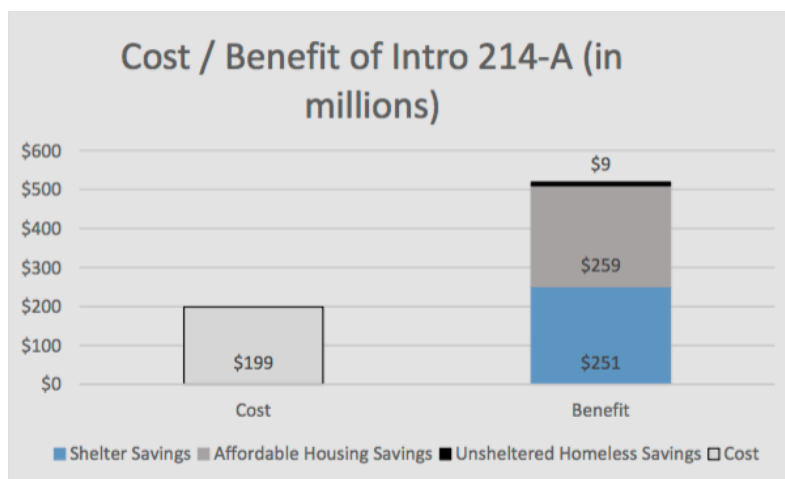
The New York City Bar Association asked Stout Risius Ross, Inc. (SRR), a global financial advisory firm, to project the costs and benefits of Intro 214-A, a bill filed with the New York City Council that would provide a right to counsel for low-income tenants. Below are highlights from SRR's report, which are compared to similar reports from the City's Independent Budget Office (IBO) and the City Council's Finance Division.

- **Intro 214-A will entirely offset the cost of counsel and save the City a total of \$320 million per year, even with income eligibility at 200% of the poverty level.** This is contrary to the findings in the IBO and City Council reports, which both estimated that the cost would outweigh the benefits.
- **Nearly 130,000 tenants will qualify for a right to counsel under Intro 214-A.** This is substantially more tenants than predicted by the City's Independent Budget Office or the City Council in their reports (which used the 125% of poverty level figure), yet the SRR report still determines there will be substantial savings.
- **5,237 fewer families and fewer 1,140 individuals will wind up in homeless shelters due to eviction.** The shelter money saved (even the money coming from the federal and state governments) can then be put to other City housing and homelessness services.
- **The City will save over \$250 million in avoided shelter costs.** It costs over \$43,000 to shelter a family and over \$22,000 to shelter an individual, and the report estimates that 5,237 families and 1,140 individuals will avoid homeless shelters due to eviction.
- **The City will save \$9 million through stemming of secondary costs when evicted tenants become homeless.** These include use of taxpayer-funded hospitals and law enforcement.
- **The City will save \$259 million through the retention of 3,414 affordable units.** Every time a tenant is evicted from rent-regulated housing, the unit becomes less affordable, requiring the City to spend money to establish a new affordable unit. Mayor de Blasio's Housing Plan already anticipates that the City has to build or preserve 200,000 units of affordable housing.
- **There are other possible savings from Intro 214-A that can't currently be estimated due to a lack of data, so Intro 214-A may generate an even bigger benefit.** These include:
 - The societal costs of homelessness on children (education, criminal justice, welfare, etc.);
 - The effect of evictions and/or homelessness on welfare applications;
 - The possibility that universal representation for tenants will lead to fewer frivolous eviction filings by landlords, which over time will help court budgets and bring down the number of tenants needing counsel.

- **The IBO and City Council’s Finance Division reports have less accurate data and do not include some savings.** Specifically, these reports:
 - Underestimate the number of families entering shelter due to eviction;
 - Underestimate the cost of sheltering families;
 - Underestimate the amount already committed by the City for eviction defense;
 - Do not consider the loss of affordable housing units or the secondary costs of eviction (such as increased use of emergency rooms and law enforcement);
 - Subtract the money the federal/state government will save through Intro 214-A, even though that money will not be lost to the City.

Table Summarizing Results from the SRR, IBO, and Finance Department Reports

Description	SRR	IBO	Finance
Cost of providing counsel	(\$259 million)	(\$173 - \$276 million)	(\$117 million)
Offset for amount already spent on counsel by City	\$60 million	\$20 million	didn’t offset
Total savings from reducing shelter use	\$251 million	\$143 million	\$171 million
Fed/state shelter savings not included	n/a	(\$90 million)	(\$120 million)
Savings from avoiding loss of affordable housing units due to eviction	\$259 million	didn’t assess	didn’t assess
Savings from avoiding other homelessness costs (hospitals, law enforcement, etc.)	\$9 million	didn’t assess	didn’t assess
Total (cost) / benefit of providing counsel	\$320 million	(\$100-\$203 million)	(\$66 million)





HOUSING JUSTICE:

New Yorkers Should Have a Right to Counsel in Eviction Proceedings

THE FACTS

New Yorkers do not now have a right to an attorney in eviction cases in housing court.

- More than 90% of landlords who bring eviction cases are represented by lawyers.
- More than 90% of tenants aren't.
- When people get evicted, they often go into the shelter system
- Eviction cases are complicated, move fast and are highly technical; it is very difficult, if not impossible, to defend an eviction case without a lawyer.

A Right to Counsel in eviction cases will legislate justice!

- Landlords are aware of the unbalanced nature of the housing court. They often initiate legal proceedings knowing that low-income tenants will most likely not be able to afford counsel.
- Studies show that when tenants are represented by counsel, they are better able to protect their homes and effectively assert their rights around housing conditions, rent, and discrimination.
- The constitution guarantees *due process of law* (fair access to the legal system) to protect individual liberty and property interests. This means that a tenant should not have to defend a legal proceeding that could result in the loss of his or her home without a right to counsel.
- The constitution also guarantees *equal protection of the law*, which requires states to apply the law equally and not discriminate against people or groups of people. Low-income people who face eviction, most of whom are people of color in New York City, are denied equal protection when they are denied a right to counsel in eviction cases.

Evictions are devastating for low-income tenants.

- Nearly 25,000 families, including older adults, were evicted in New York City last year.
- Surveys of homeless families have identified eviction as an immediate, triggering cause of homelessness for thirty-seven percent of those admitted to the New York City shelter system.
- Homelessness in New York City has recently reached the highest rates since the Great Depression of the 1930s.
- In September 2014, there were an all-time record 58,056 homeless people, including 13,922 homeless families with 24,631 homeless children, sleeping in the New York City municipal shelter system each night. There are approximately 2,000 seniors in shelter every night.
- At least 3,200 homeless individuals, including seniors, also sleep on the streets and subways each night.
- The current number of homeless New Yorkers is 87% higher than it was in January 2002, when former Mayor Bloomberg took office.
- Even if tenants don't become homeless after an eviction, they face higher rents, disruption in their children's education, displacement from their communities and other traumatic consequences.

A right to counsel in eviction proceedings will save the city money.

- A report by a private financial firm shows that Right to Counsel *will not only pay for itself but in addition, it will save the city more than \$320 million per year!*
- Keeping families and older adults in their homes and avoiding homelessness will also avert long term costs associated with homelessness in health, education, employment and other areas.
- **The price of full legal representation in Housing Court is estimated at \$1,600- \$3,200 per case.**
- If we don't invest in lawyers for tenants, *it will cost us much more* to find housing for tenants who have been evicted: each bed in a New York City municipal shelter costs **\$36,000** per year; developing a single affordable housing unit costs over **\$250,000**.
- When households are evicted from rent-regulated units, landlords often exploit loopholes in the system to permanently raise the rent to market-rate for future tenants, thereby diminishing the number of affordable housing units and exacerbating the shortage of affordable housing.

Why now?

- With eviction and homelessness rates steadily rising, this is a critical issue in New York City right now.
- Elected City Council officials have introduced legislation that would provide legal counsel to low-income tenants facing eviction.
- The Mayor has made affordable housing and economic equity central themes of his administration.
- Every Community Board in Manhattan, Brooklyn and the Bronx have passed resolutions in support of Right to Counsel!
- Elected officials, community activists, academics, legal service providers, bar associations, public policy experts and others have all come together to advocate for the establishment of this important right.

Let's make history! With your help, New York City will become the first City in the country to establish this critical right to counsel.

Protecting Tenants from Harassment: Creating a Citywide Certificate of No Harassment Requirement

- I. **What's the basic idea behind a Certificate of No Harassment program?**
 1. With market rents increasing across the City, there is a growing incentive for landlords to dramatically raise rents in both rent-stabilized and unregulated housing. In rent-regulated housing, loopholes in the law mean landlords profit financially from turnover much more than they can from keeping long-standing tenants in place. Most landlords follow the law, but too many do not, and communities are seeing landlords use harassment to push out low-rent-paying tenants with growing frequency. This problem is displacing low income tenants from their communities, and diminishing the City's supply of affordable rental housing.
 2. We need stronger tools to proactively discourage landlords from harassing their tenants in increase their profits. The Certificate of No Harassment program is intended to create a financial disincentive to harassment that will hopefully help to cut down dramatically on the number of landlords that see harassing out long-term tenants as a smart business move. Though the City does not control the rent laws, it does have real leverage that can be used to effectively disincentivize at a city-wide level.
 3. When an apartment is vacant, it is often necessary for a landlord to apply for a Department of Buildings construction permit in order to do the work in the apartment (an Alt 2 Permit) and the building (an Alt 1 Permit) that will attract higher paying tenants, and allow dramatic rent increases under rent stabilization laws.
 4. The Certificate of No Harassment program will create a process that will allow the City to closely scrutinize Alt 2 and Alt 1 permit applicants whose records raise red flags suggestive of tenant harassment. That initial determination would be based on a variety of available data.
 5. The great majority of landlords who do not raise any flag would go through the ordinary permitting process that exists today, with no additional delay. But landlords whose buildings are flagged would have to apply for a Certificate of No Harassment – verification that the building does not have a history of tenant harassment – before their building or alteration permits could move forward.
 6. If there is a finding of harassment and the Certificate is denied, the Department of Buildings *would not grant building or alteration permits* for that building *unless* those landlords agreed to a “cure” that includes creating new permanently affordable housing.
 7. Building owners readying for a sale could also, if they chose, apply for a Certificate of No Harassment before transferring the building to a new

owner. This would enable owners to sell buildings with “clean” titles, easing the minds of potential purchasers by removing any doubt about future roadblocks.

II. How would it work for landlords applying for construction or renovation permits?

1. HPD would be required to keep a city-wide database of buildings with indications of possible harassment. The database would include such records such as:
 - i. HPD and DOB violations
 - ii. Complaints:
 1. All complaints to DOB on any construction-related matters, and the results of any investigations undertaken in response to such complaints
 2. All complaints of harassment filed with DHCR with accompanying documentation, including outcome of all complaints
 3. All 311 complaints made by tenants pertaining to heat and hot water or reduction in services complaints, and the results of any investigations undertaken in response to such complaints.
 4. Reports of harassment submitted by community groups
 - iii. Notices, inspections, and repairs of lead paint hazards
 - iv. Total # of permits applied for within a specified time period
 - v. # of times building has changed hands w/in a specified time period
 - vi. # of vacancy bonuses taken within a specified time period
 - vii. Court cases
 1. Tenant Protection Act filings and outcomes
 2. Housing court cases initiated against tenants
2. Landlords who did *not* raise red flags could go through the current process to get their permits from DOB.
3. Landlords who raise “red flags” would go through a rigorous screening process before receiving Alt 1 or Alt 2 permits to renovate or demolish and rebuild their buildings.
 - i. Either HPD, or one third or more of the rent-regulated tenants in occupancy could move to initiate the administrative hearing to consider claims of harassment.
 - ii. This structure would mirror the process that governs 7(a) hearings, which can be brought by the City, HPD, or one third of the tenants in occupancy.
4. Steps of that review process:

- i. *Notification*
 1. Notice would be sent to tenants, the community board, the council member, and local community organizations, which could sign up to receive notices via email.
 2. Notice would be in plain language easy for tenants to understand.
 3. Notices to tenants would include information on the type of work the landlord is applying to do, and define harassment through a list of possible harassment tactics. Tenants could review the list, check off any forms of harassment they may have experienced, and return the form to HPD. The notice would also include info on contacting a local org or legal service provider for assistance.
 4. Notice would take language access issues into account.
- ii. *Responses*
 1. Tenants would have 60 days to respond to the notice, and could request an extension if necessary.
 2. Landlord would then have 30 days to respond. Among other information, the landlord would be required to return:
 - a. Rent registration history of all units
 - b. Copies of all leases signed in the last 15 years
 - c. Annual lease renewals for all rent-stabilized units
 3. The hearing would take place within 60 days of the landlord's response, and HPD would rule within 30 days after the hearing.
 4. Total timeline = 6 months from date notice is first sent to tenants (could be slightly more if tenants request an extension for initial response, or slightly less if LL and/or HPD moves quickly)
- iii. *At the hearing, tenants and community groups would have an opportunity to testify, and HPD would be required to consider the information found in the Harassment Indicators Database and:*
 1. Testimony or affidavits from tenants, former tenants, and organizers, including any forms returned by tenants through the process described above
 2. Court records
 - a. If any tenants have won harassment claims against the LL, the CONH should automatically be denied
 3. Pattern of frivolous lawsuits
- iv. *If HPD found that no harassment had occurred, the landlord would receive a CONH and could proceed to DOB to get a building*

permit. But if HPD found that harassment had occurred, the landlord would have 2 choices:

1. Leave the building as is and not receive DOB permits.
2. Take a "cure" by entering into a legally binding agreement that a certain share of the floor space in the new building would be permanently affordable housing.
 - a. "Cure" would be 30% of units in the building, with 7.5% of units affordable to people at or below 20%, 30%, 50%, and 60% AMI.
 - i. This would not include any affordable housing the LL might already be required to build under Mandatory Inclusionary Housing, under tax abatement programs, etc.
 - ii. Landlords would not be permitted to use any HPD subsidies to build "cure" units.
 - b. The distribution of unit sizes for "cure" units would be required to be the same as that for non-"cure" units (i.e. if half of the market-rate units in the building are 2 BRs, half of the cure units would also have to be 2 BRs). "Cure" units would also have to be distributed evenly throughout the building, not on separate floors or wings.
 - c. Landlords found guilty of harassment would also be prohibited from selling the building's unused air rights.
5. In general, the Certificate would be good for a period of 3 years following the hearing.
6. However, if a building receives a CONH and the owner is later found to have lied in the process and/or engaged in harassment during the period that was reviewed, the CONH would be revoked and the LL would be barred from applying for a new CONH for 5 years. Similarly, if a landlord is found to have engaged in tenant harassment within 3 years after receiving a CONH, both the Certificate and the permits issued on the basis of the Certificate can be revoked. As with the initial hearing, a hearing to challenge the issuance of a CONH could be initiated by HPD, or by one third or more of the rent-regulated tenants in occupancy.

III. **How would it work for owners hoping to get a CONH in advance of a building sale, to transfer the building "clean"?**

1. Instead of first going to DOB for permits, owners in this situation could apply directly to HPD for a CONH.
2. Otherwise, the process would be the same.

Ensuring Responsible Contracting: HPD Procurement Reform

Fair and Level Playing Field • *Quality Oversight* • *Wage Theft Protections*

During the Bloomberg era, Housing Preservation and Development (HPD) built or preserved the target goal of 165,000 units of affordable housing. Though the agency was able to carry out the desired number of units, the lack of oversight and an obscure procurement process lead to criminal corruption of agency officials, worker exploitation, closed door contracting, systemic quality issues, and rampant wage theft. Now, Mayor Bill de Blasio has put this issue at the forefront of his policies by again tasking HPD with the creation and preservation of 200,000 units of affordable housing over the next 10 years. But with no comprehensive reform to the agency's currently broken system, the future of affordable housing will be tainted by the same disreputable practices as the past.

The New York City Council is currently reviewing Intro. 967, legislation that will create an ombudsman position within HPD to track quality complaints and constitutes a preferred contractors list to weed out low-road contractors.

Intro. 967 is a well-intentioned policy, but flawed to the point of causing harm to low-income workers and tenants. The current bill provides no new oversight mechanism and in fact, will functionally legitimize HPD's broken affordable housing procurement and contracting system.

Although Intro. 967 is a good start, more needs to be done to ensure the affordable housing industry in this city does not continue to exploit our most vulnerable workers and we are not creating substandard construction with our tax dollars.

Intro. 967 must be changed to:

1. Create an independent and empowered ombudsperson with the authority to proactively investigate labor and housing quality issues,
2. Eliminate the de facto system of awarding preferred contractor status and replace it with a process that ensures serious due diligence by HPD,
3. Protect the integrity of the preferred contractor system by requiring contractors certify the accuracy of data provided to HPD and regulating civil and criminal penalties for providing false, inaccurate or incomplete information,
4. Broaden the criteria of consideration for preferred contractor status to include indicators of labor violations on all types of jobsites, not just prevailing wage projects,
5. Make all materials considered when awarding preferred contractor status available to the public on HPD's website.

MEMORANDUM

To: *City Council Speaker Melissa Mark-Viverito; Public Advocate Leticia James; Deputy Mayor Alicia Glen; Council Member Rafael Espinal; Council Member Debi Rose; Council Member David Greenfield, Chair of Land Use Committee and City Council Land Use Committee Members: Vincent Gentile; Annabel Palma; Inez Dickens; Daniel Garodnick; Darlene Mealy; Rosie Mendez; Ydanis Rodriguez; Peter Koo; Brad Lander; Stephen Levin; Jumaane Williams; Ruben Wills; Donovan Richards; Inez Barron; Andrew Cohen; Ben Kallos; Antonio Reynoso; Ritchie Torres and Mark Treyger*

From: *Association for Neighborhood and Housing Development (ANHD); Center for Urban Pedagogy; Coalition for Community Advancement: Progress for East New York; Community Action for Safe Apartments (CASA); Community Development Project at the Urban Justice Center; Community Voices Heard; Fifth Avenue Committee; Flushing Rezoning Community Alliance; Hester Street Collaborative; Neighbors Helping Neighbors; Pratt Center for Community Development*

Subject: *Proposal for Citywide & Local Monitoring & Oversight for Rezoned Neighborhoods*

Date: *June 6, 2016*

As the City continues to roll out the plan to rezone multiple neighborhoods across New York City in order to build more housing, community members are working hard to ensure that their voices are heard and priorities are included in their neighborhood's rezoning plans. Several communities, including those in East New York in Brooklyn, East Harlem in Manhattan, Jerome Avenue in the Bronx and Flushing West in Queens, have embarked on deeply participatory processes that have engaged tens of thousands of neighborhood stakeholders to create community-based plans and policy platforms to articulate their priorities.

Accordingly, we are calling for a comprehensive and coordinated approach to documenting, monitoring, overseeing and enforcing all public and private commitments made during the rezoning processes. This approach, outlined below, should include a citywide and a neighborhood-based, community-led component and should build off and fill the gaps of the various proposals put forth by the City.

While we continue to organize and push for our communities' priorities to be adopted as part of the various rezoning processes, we have seen too often that the commitments made during a rezoning are not kept or enforced. We also know that some commitments are not enforceable, such as promised expenditures in future years. We are deeply concerned about what this means for our communities and neighborhoods and hope to work with the City to ensure that the community's priorities are implemented and enforced.

The City's Proposals

To address the need for oversight and enforcement of commitments and agreements made during rezoning processes, the City (including the City Council and Mayor's office) have put forth several proposals. While we are encouraged that the City is thinking about the need to record and monitor commitments, we have some outstanding questions and concerns about these proposals.

- **Intro 1132**, a bill co-sponsored by City Council Speaker Melissa Mark-Viverito, Public Advocate Letitia James, Council Members Rafael Espinal and Debi Rose. The bill would require an agency of the Mayor's choosing to maintain a publicly accessible online database tracking all written commitments made by the mayor or any mayoral agency as part of any City-sponsored application subject to ULURP.
 - *Outstanding questions/concerns: This is limited to public commitments and does not include commitments made by private developers. It is also not clear from the legislation how "commitment" is being defined and in what format the database will be maintained. It is also unclear how accessible this database will be to local residents. It is not clear which mayoral agency will monitor the commitments or how these commitments will be monitored or enforced. It is also unclear which entity in power will oversee the fiscal decisions related to rezoning.*

- **Role of Mayor's Office of Operations:** As part of the Mandatory Inclusionary Housing (MIH) agreement, the Administration committed to develop an approach to report annually its commitments for City-initiated neighborhood rezonings through the Mayor's Office of Operations. All Neighborhood Development Funds will be incorporated in these reports.
 - *Outstanding questions/concerns: It is unclear how the Mayor's Office of Operations will publicly report out on progress made on commitments and whether this office will have any interaction with community-based stakeholders. It is also unclear if this office will coordinate all the agencies taking part in implementing the commitments made. If this office is not responsible for making sure the commitments are actually implemented, then who is?*

- **Department of City Planning's Division of Capital Planning and Infrastructure:** Cited in a memo from Mayor de Blasio, this new unit would work with budget officials on implementing rezoning plans.
 - *Outstanding questions/concerns: We do not have any further information about this unit or whether it is currently operational. It is also unclear how this unit will interact with Intro 1132, the monitoring function of the Mayor's Office of Operations and Housing Preservation and Development's enforcement function of MIH. We would like to know more about this unit, how it will be staffed and resourced, what its mandate will be and how it will coordinate with other City agencies and with local stakeholders and residents.*

- **Local Law to Permit Department of Housing Preservation and Development (HPD) to enforce Mandatory Inclusionary Housing requirements:** As part of the MIH agreement, the Mayor’s office committed to enacting a local law to empower HPD to enforce MIH.
 - *Outstanding questions/concerns: MIH is just one aspect of the many agreements made during rezoning. How will HPD interact with other agencies that are also responsible for implementing commitments to make sure that holistic neighborhood plans are being implemented and enforced? What are the accountability mechanisms in place to ensure HPD is transparent in its enforcement of MIH?*

Our Approach

We propose that a specific mayoral office work with local neighborhood monitoring committees in each rezoned neighborhood in order to uphold the commitments made during the rezoning process and coordinate the many stakeholders and agencies that are part of the process. This approach builds off of and fills the gaps of the various proposals already put forth by City officials for monitoring and enforcement of rezoning commitments. Below we lay out a proposed structure, role and powers of the mayoral (citywide) and neighborhood bodies. We look forward to working with the Mayor’s Office, the Speaker and the City Council to further develop this proposal.

1. Mayoral Office: Providing Citywide Oversight, Data Sharing and Agency Coordination for Rezoned Neighborhoods

Overseeing the large public investment of subsidies associated with Housing NY and the Neighborhood Development Fund while supporting the ongoing, equitable growth and development in rezoned neighborhoods will require an integrated approach absent from previous rezonings. The proposed tasks below reach beyond the purview of any one agency or existing Mayoral office and will require a high level of interagency coordination.

Accordingly, we believe that a specific mayoral office is needed to provide overall agency coordination, oversight and accountability for the implementation of commitments made to communities during the rezoning process. This office could also oversee the spending of zoning-related investments, direct spending to fulfill community priorities, and implement commitments on a clear and measurable timetable. This Mayoral office could also absorb the zoning-related reporting tasks that the City’s proposals have assigned to the Mayor’s Office of Operations, as well as fill roles envisioned in the City’s proposals that do not yet have an office to execute them, such as maintaining the database proposed in Intro 1132. While this Mayoral office could be a new office established via citywide

legislation, it could also be housed within an existing office with the resources, staff and flexibility to take on the following roles.¹

We propose that a coordinating Mayoral office do the following:

- **Coordinate Agencies:** The office should convene regular meetings both on the citywide and neighborhood level and mandate the attendance of relevant city agency representatives including (but not limited to) HPD, SBS, EDC, DOE, DEP, DCP, DOT, SCA and DOB to ensure inter-agency coordination and cooperation in implementing commitments. The Mayoral office should also coordinate communication between agencies and respective neighborhood monitoring committees. For example, if a new school is included in a “commitment plan” this office will coordinate all the agencies that would be involved in making sure the school is built and operationalized.
- **Support Neighborhood Monitoring Committees:** The office should ensure the establishment and operation of local monitoring committees and provide funding to those committees to support operating expenses for areas such as language access, outreach and engagement, materials creation and meeting facilitation. Local monitoring committees will be composed of neighborhood residents as well as agency representatives and other stakeholders (see pg. 5-6 for more information on the proposed committees).
- **Report on Progress:** Building off of Intro 1132, in coordination with the neighborhood monitoring committee, the office should create goals and benchmarks for each rezoned neighborhood, based on the community’s stated priorities and commitments made in the zoning plan. The office should then conduct ongoing assessments for each rezoned neighborhood and compile an annual report to track progress towards goals and benchmarks. The office could also track the funding status for all commitments made during the rezoning process and ensure projects are completed on a clear timeline, and, in consultation with neighborhood monitoring committees, propose solutions and alternatives to problems that may arise. Local neighborhood monitoring committees should be the direct recipients of the assessments and annual progress reports.
- **Manage and Share Data:** In addition to maintaining a publicly accessible online database and producing annual progress reports on commitments per Intro 1132, the office should regularly update key metrics related to the implementation of the rezoning plan. This information should be available on the office’s website and should also be regularly shared with each community.

¹ *This approach builds off of various models for cross-agency coordination and government accountability for major investment, including the Mayor’s Office of Recovery and Resiliency (ORR) as well as the Mayor’s Office of Criminal Justice Public Housing Neighborhoodstat program.*

The office should also ensure that community members receive the appropriate training and education so that they can understand and process the data.²

Housing these various roles in a single, specialized, mayoral office would ensure that sufficient capacity and focus can be dedicated to overseeing the many moving parts of implementing rezoning commitments, and establish a clear responsible party with the authority to direct agency actions. Coupled with the below local monitoring component, this approach would also enable participation from local residents and stakeholders who are needed to maintain strong communities.

2. Local Neighborhood Monitoring Committees: Providing Real Participation and Oversight to Local Residents

Community members work tirelessly to ensure their voices are heard and priorities incorporated into the rezoning processes in each neighborhood. Accordingly, these community members must be able to continue to participate in the monitoring and decision-making related to the changes in their neighborhood. Neighborhood monitoring committees should be established via citywide legislation to ensure that any commitments made during a rezoning process (of a certain size) are implemented, and that implementation decisions are made in a way that supports community priorities. We propose that funding is made available for operating expenses and staffing for the committees.³

A. While each neighborhood should decide on their own scope of work and structure, we offer some proposed roles for the committee.

- ✓ **Monitor Neighborhood Commitments** that will be documented in the online public database established via Intro 1132. Neighborhood committees will work with the coordinating mayoral office to identify a timeline and implementation plan for commitments in each neighborhood that are in line with each community's priorities. The committee will then meet regularly with City officials to track progress on these commitments.
- ✓ **Problem-solve and Advocate:** Work with the Mayor's office and various City agencies to ensure that the commitments and communities' priorities are being fulfilled.

² This data sharing and community education can be based on the model of the Office of Criminal Justice Neighborhoodstat program.

³ A model of a successful local oversight body is the Hunts Point Monitoring Committee, which grew out of the expansion of the Wastewater Treatment Plant. In that case, DEP funded an agency liaison, a Committee coordinator, and a consultant to support the research and writing needs of the Committee.

- ✓ **Inform:** Create opportunities for regular updates to the larger community and for feedback on the implementation of various public and private commitments made during the rezoning.
 - ✓ **Agency Collaboration:** Agencies should be mandated to attend regular meetings of the neighborhood monitoring committees. These agencies should provide information and data to ensure that the committee is informed about the implementation of all zoning-related agreements and projects.
 - ✓ **Evaluate:** Work with the coordinating mayoral office to establish a set of metrics by which to evaluate the impact of rezoning actions – both before and after implementation. Some metrics to consider might be changes in employment rates/fields to assess promised job creation, high-road business development, changes in demographics (including racial demographics, changes in local incomes, share of non-English speakers, share of rent-burdened households, etc), and change in/loss of affordable housing units.⁴
- B. These committees may take different forms depending on the neighborhood. Each will be composed of neighborhood residents and other local stakeholders; will develop their own scope of work; type of committee composition, selection systems for committee members, voting powers, committee leadership, and the role of agency representatives, amongst other things.

3. Moving Forward

While we are encouraged by the proposals put forth by the City Council and the Mayor’s office to monitor commitments made during the rezoning, we believe a stronger, more coordinated approach is needed to ensure that commitments made during the rezoning process are implemented and operationalized. This approach includes both a centralized mayoral office and local neighborhood monitoring committees working together. We believe this approach will go further in ensuring that our long term residents are protected from displacement and that our communities are able to participate in the changes that are taking place. We look forward to working with you on implementing this critical proposal.

⁴ *This is modeled off of the Portland Plan, created by the City of Portland, Oregon, which works to evaluate and better manage potential gentrification impacts of policies and programs in changing neighborhoods. An assessment tool created for the Plan includes three components: 1) a Vulnerability Analysis; 2) Gentrification + Displacement Study, and; 3) Gentrification Risk Assessment Maps. The Portland Plan “sets an expectation that an equitable city should be proactive about the inequitable impacts that neighborhood change and gentrification can have on vulnerable households.”*

April 18, 2016

Carol J. Samol
Bronx Borough Director
NYC Department of City Planning
1 Fordham Plaza, 5th Floor, Bronx NY 10458

RE: Jerome Ave Rezoning

Dear Carol Samol,

The Bronx Coalition for a Community Vision has been working in the Southwest Bronx for over a year to gather feedback from residents about how the Jerome Avenue rezoning plan can benefit the local community and help our neighborhoods thrive. We have engaged thousands of residents over the course of dozens of meetings and hundreds of surveys, and collectively, the group has identified several key principles that should guide the rezoning:

1. **Anti-displacement strategies for current residential and commercial tenants.** Current tenants and small business owners will not benefit from the rezoning if the rezoning increases rents, speculation, and the forces of displacement. The City should take steps to ensure that the people and businesses that are here now are protected and are able to stay.
2. **Real affordable housing.** All of the new housing built in the community should be at rent levels that reflect the need in the community.
3. **Good jobs & local hire.** New construction and businesses will mean a lot of new jobs in the area and the City should guarantee that those jobs create career opportunities for local residents. Also, developers should not be allowed to build unless they commit to using contractors that are part of State Department of Labor Registered and Approved Apprenticeship programs.
 - a. **Safety and training.** There recently has been an alarming increase in construction worker fatalities and life changing injuries in New York City. 18 construction workers died in the field from the beginning of 2015 to date. The City must mandate provisions for worker safety and training to ensure our most vulnerable workers are protected.
4. **Real community engagement.** Residents need to have a say over what happens in the community, and the City should have long-term tools to ensure accountability for implementing commitments made during rezoning approval process, including a role for community in overseeing progress. The community needs this to ensure that the rezoning is actually part of a community plan that is effective and fully implemented.

On March 9, 2016, we sent you a detailed letter outlining the recommendations from our report that can be incorporated into the zoning text and accompanying neighborhood plan for Jerome Ave. In the attached letter, we describe the analyses we believe the Department of City Planning

(DCP) must perform to adequately assess the neighborhood need, the impacts of the proposed plan, and the feasibility of the coalition's policy proposals.

As the City prepares to release its proposal, we urge the City to perform these analyses to accurately measure impacts in the environmental review, recommend these mitigations as part of the ULURP process, and adopt these recommendations as part of crafting a plan that meaningfully advances the community's goals. Above all, we urge the City to examine not just the extent to which the proposed Jerome Ave rezoning may advance the City's overall policy goals, including the Housing New York plan, but also how much the rezoning advances the local goals community members have identified. The rezoning of Jerome Ave should not just be thought of as a means to the end of advancing the Mayor's affordable housing plan - the stakes for longtime community residents are high and they should not be an afterthought. Instead, the plan should also be crafted and assessed based on the how much the rezoning will benefit current residents.

We are asking that what appears in the draft scope and is proposed to be studied in the EIS include our recommendations for what should be written into the zoning text. This will be a sign that the administration is willing to look at the needs that community residents have identified.

In addition, between the time the draft scope is released and before ULURP starts, we want the following recommendations to be implemented (the policies are explained in more detail in the attached letter):

Anti-Displacement and Anti-Harassment Policies for Residential Tenants:

- Pass and Fund Intro 214, providing a right to counsel for all tenants facing the loss of their home in NYC
- Pass legislation enacting a citywide certificate of no harassment that will be in place before the Jerome Ave ULURP applies.

Anti-Displacement for the Commercial Tenants and Auto Workers on Jerome Ave:

- The City should ensure that the auto workers do not lose their livelihoods. This can be done by enhancing the retention areas, identifying relocation locations, as well as ensuring that all businesses are in compliance.

Good Jobs, Local Hire, Safety and Training:

Public funds come with public responsibility. Tax payer funded subsidies used by developers and contractors to build affordable housing should provide good wages to help the community create more middle class jobs; require utilization of the State Department of Labor Registered and Approved Apprenticeship Program and demand the highest level of safety training available to ensure safe working site and communities.

- The City should provide funding for programs to ensure that local residents are eligible and prepared for the state certified apprenticeship programs, including GED programs, stipends and childcare.
- The City must also adopt local hiring requirements for the rezoned area. This can be done either through the creation of special purpose districts that mandate local hire and/or through an executive action that mandates local hiring for all projects using city subsidies.
- The City must mandate provisions for worker safety and training to ensure our most vulnerable workers are protected. Developers should not be allowed to build unless they commit to using contractors that are part of a NYS approved apprenticeship program.

Real Affordable Housing:

- The City should ensure that new housing reflects the needs of current neighborhood residents, including rent levels affordable to the current community. This should be done through the creation of a special purpose district that mandates real affordable housing and local hire, and/or through the creation of a new HPD term sheet that will match the AMI levels prevalent in the community.
- The City should create new requirements for developers seeking public subsidies (see attached for more info).

Real Community Engagement:

- Create a formal opportunity for community oversight of the plan's implementation.

We believe that we are at a moment where we face a challenge to do zoning in a different way. We believe that our plan lays out a roadmap to achieve progress and change without exploitation, harassment and displacement.

While we have yet to see the specific plan for Jerome Avenue, the draft framework that DCP has presented foresees a Jerome Ave of increased density and an 83% loss of districts zoned for manufacturing and heavy commercial uses.

If our recommendations are not incorporated into the plan before ULURP starts, we believe that the displacement pressures will be so great that the negative consequences of the rezoning will greatly outweigh any benefits or progress it might bring. We will have no choice but to urge our elected officials to vote no to any plan that doesn't secure housing, jobs and security for those who need it the most. We expect that you will take our recommendations as seriously as we do.

Please feel free to reach out with any questions you may have. You can call Carmen Vega-Rivera at 718-665-5907 or 917-864-2224 or cvegarivera1@aol.com.

Sincerely,

The Bronx Coalition for a Community Vision

The Bronx Coalition for A Community Vision consists of Community Action for Safe Apartments-New Settlement Apartments, Latino Pastoral Action Center, Northwest Bronx Community and Clergy Coalition, Mothers on the Move, United Auto Merchants Association, Faith In New York, Local 79, Plumbers Local No. 1, NYC District Council of Carpenters, Greater NY-LECET, 100 Black Construction Workers, New York State Iron Workers District Council, Insulators Local Number 12....list in formation.

The Coalition is supported by: The Community Development Project at the Urban Justice Center, Pratt Center for Community Development, Hester Street Collaborative, The Association for Neighborhood and Housing Development, The Center for Urban Pedagogy, and the Real Affordability for All Coalition...list in formation.

cc: Council Member Vanessa Gibson, Council Member Fernando Cabrera, Council Member Donovan Richards, Council Member Jumaane Williams, Council Member David Greenfield, Bronx Borough President Ruben Diaz Jr., NYC Comptroller Scott Stringer, Speaker of NYC City Council Melissa Mark-Viverito, Mayor Bill de Blasio, Deputy Mayor Alicia Glen, Vicki Been, Commissioner of HPD, Carl Weisbrod, Commissioner of DCP, Gregg Bishop, Commissioner of Small Business Services, Maria Torres-Springer, President and CEO of NYCEDC.

JEROME AVE ASKS FOR THE REZONING PLAN AND DRAFT SCOPE OF ENVIRONMENTAL REVIEW

The Bronx Coalition for a Community Vision has been working in the Southwest Bronx for over a year to gather feedback from residents about how the Jerome Avenue rezoning plan can benefit the local community and help our neighborhoods thrive. We have engaged thousands of residents over the course of dozens of meetings and hundreds of surveys, and collectively, we have identified several key principles that should guide the rezoning:

1. **Anti-displacement strategies for current residential and commercial tenants.** Current tenants and small business owners will not benefit from the rezoning if the rezoning increases rents, speculation, and the forces of displacement. The City should take steps to ensure that the people and businesses that are here now are protected and are able to stay.
2. **Real affordable housing.** All of the new housing built in the community should be at rent levels that reflect the need in the community.
3. **Good jobs, local hire & worker safety.**
 - New construction and businesses will mean a lot of new jobs in the area and the City should guarantee that those jobs create career opportunities for local residents. Developers should not be allowed to build unless they commit to using contractors that are part of a NYS certified apprenticeship program.
 - The City should ensure that worker safety is a top priority. There has been an alarming increase in construction worker fatalities and life changing injuries across New York City. 18 construction workers died in the field from the beginning of 2015 to date. The City must mandate provisions for worker safety and training to ensure our most vulnerable workers are protected.
4. **Real community engagement.** Residents need to have a say over what happens in the community, and the City should have long-term tools to ensure accountability for implementing commitments made during rezoning approval process, including a role for community in overseeing progress. The community needs this to ensure that the rezoning is actually part of a community plan that is effective and fully implemented.

As the City prepares to release its proposal for the Jerome Avenue rezoning, we urge the City to craft a plan that meaningfully advances the community's goals. Above all, we urge the City to examine not just the extent to which the proposed Jerome Ave rezoning may advance the City's *overall policy goals*, including the Housing New York plan, but also how much the rezoning advances these *local goals*. The rezoning of Jerome Ave should not just be thought of as a means to the end of advancing the Mayor's

affordable housing plan - the stakes for longtime community residents are high, and they should not be an afterthought. Instead, the plan should also be crafted and assessed based on the how much the rezoning will benefit *current residents*.

The City must also conduct its analysis in a manner that reflects the reality that the proposed rezoning will affect multiple neighborhoods, not just the “rezoning corridor” of Jerome Avenue. In general, to ensure that residents can understand the full impact of the rezoning on their community, the Department of City Planning (DCP) and related agencies should analyze each of the *neighborhoods* that will be affected by the rezoning, and

- Create a profile for each impacted neighborhood that shows the existing needs and capacity for the preservation and development of affordable housing, high-quality jobs, school seats, park space, transportation, sewage infrastructure, and other facilities and services
- Craft a rezoning plan based around meeting these existing needs, and heightened needs that will arise as a result of increased populations following the rezoning
- Include clear proposals, both in the zoning text and as proposed mitigation strategies, explaining how and when each neighborhood’s existing and future needs will be addressed

We believe that it is possible for rezonings to benefit local communities - but only if the City places the needs of current residents front and center at the beginning of the planning process, and long afterward. Below, we provide suggestions for specific analyses the City must conduct to assess the true impact of the rezoning, mitigation strategies we would like the City to disclose, analyze, and adopt to ensure that local residents are protected from potential residential displacement pressures, business displacement pressures, and overburdening of community facilities, and provisions we believe must be included in the zoning plan for the Jerome Avenue area.

In addition to creating a zoning plan that addresses the needs of the community and supports long-term development in line with those needs, the City should adopt a broad range of mitigation strategies to combat residential displacement and business displacement and mitigate the impact on local community facilities. These tactics are described more fully in the sections below.

We understand that different parts of the environmental review process and the land-use review process contribute in specific ways to the development of a neighborhood plan. From the community perspective, however, we understand that what happens to our neighborhood in the future is shaped by a Mayor and City Council that have multiple tools at their disposal to work in concert with land-use planning. Our recommendations call on the Mayor and the City Council not to advance land-use actions in isolation, and to only advance land-use actions that are accompanied by all the tools necessary to advance community goals.

Where possible we have done our best to try to sequence and highlight which actions can be specifically addressed through the Scoping process of the EIS and the drafting of the EIS, and which actions should be in the eventual zoning text. There are other recommendations that speak to the broader set of tools that the City can employ, such as citywide policy and legislation. We are calling for these tools to be recommended as strategies to mitigate impacts, where appropriate, and otherwise incorporated into the final plans and associated actions that will impact the area.

I. RESIDENTIAL DISPLACEMENT

A. ANALYZE

- **DCP should separately analyze preservation and creation of affordable housing.** Creation of new affordable housing does not protect existing residents of the community, many of whom will be displaced by the time the new housing is created.
- **In its analysis of potential displacement, the City should present both best- and worst-case scenarios for the direct displacement** that may be caused by the actions of private landowners who may seek to redevelop their sites after the rezoning. Although CEQR [City Environmental Quality Review] typically requires an analysis that illustrates a “conservative assessment of the potential effects of the proposed project on sites likely to be redeveloped,” we are concerned that for an area-wide rezoning of this magnitude, a “conservative assessment” will paint an inaccurately mild picture of potential displacement. Therefore, the City should present both best- and worst-case scenarios so the community can have a better understanding of the full range of possible outcomes in terms of direct displacement.
- **DCP should conduct a detailed analysis of direct residential displacement, even if DCP’s initial assessment suggests that the amount of direct displacement falls below the threshold that requires a detailed analysis.** This detailed analysis would require DCP to examine prevailing trends in vacancies and rental and sale prices in the area... DCP should also conduct a detailed analysis of indirect residential displacement.
- **The City must analyze both the extent to which the rezoning may cause indirect residential displacement, and the degree to which it may accelerate displacement** that is already occurring.
- **The City’s analysis should expressly address the potential displacement risk of vulnerable populations in the area,** including:

- Tenants in unregulated apartments
 - Tenants in rent stabilized apartments
 - Tenants who are rent burdened
 - Tenants in apartments where regulatory agreements for affordability are expiring
 - Shelter, halfway house, and three quarter house residents
 - Residents of cluster site housing
 - Section 8 voucher holders
 - People of color
- **The City should analyze and disclose the impacts of past rezonings of similar magnitude as the proposed Jerome Ave rezoning.** As part of this, the City should disclose and analyze demographic information suggestive of displacement, including changes (pre and post rezoning) in:
 - Racial demographics
 - Local area median income
 - Educational attainment level of residents
 - Average rent levels in market-rate units
 - Number of rent-stabilized units
 - Percentage of non-English speaking populations
- **The City should *not* assume that developers will continue to accept HPD subsidies throughout the 15-year period following a rezoning.** Instead, the City should analyze and disclose the impacts of the rezoning based on
 - A scenario in which developers accept HPD subsidies for the entire period
 - A scenario in which developers accept HPD subsidies for only 5 years
 - A scenario in which developers accept HPD subsidies for only 10 years
 - The zoning text alone
- **The City should also look into past rezonings and examine housing market shifts after these rezonings,** for the purpose of determining the length of time during which developers are likely to seek HPD subsidies and the point at which interest in such subsidies will cease due to improved market conditions
- **The City should analyze and disclose the income levels of the households that stand to be displaced, then compare those figures to the amount of affordable housing expected to be made available at those income levels under the rezoning,** in order to net loss or gain of affordable housing for current residents. The City should consider scenarios both with and without the 50% community preference. If the City's analysis demonstrates that new construction will be inadequate to address the needs of current residents, the City should alter its plans.

- **The City should disclose the amount of affordable housing that could be created on public sites and through the zoning text alone**, since HPD subsidies may not always be available and developers may not always take them.

B. MITIGATE

The City should analyze, disclose, and adopt a broad range of mitigation strategies for residential anti-displacement, including:

- **Ensure that 100% of new housing reflects the needs of current neighborhood residents**. This includes:
 - *Subsidies and a programmatic commitment to build housing at affordability levels and apartment sizes that reflect the need of the existing residents of the neighborhood.* As part of this, HPD should create a new term sheet to ensure that HPD-subsidized projects are affordable at levels reflective of the current community. The more closely new housing matches the current income and rent levels, the less likely it is that new development will trigger gentrification and displacement.
 - *Requirements that new housing prioritize people with disabilities, single parents, veterans, youth, and people who are currently homeless.*
 - *Conversion of “cluster-site” shelter units back to permanent housing to help significantly reduce the number of homeless families*
 - *Adjust City and State rent subsidies to allow families in “cluster-site” units that meet Section 8 quality standards to secure leases for the same apartments in which they already live.*
- **Create new requirements for developers seeking public subsidies**. Public funds come with public responsibility. Tax payer funded subsidies used by developers and contractors to build affordable housing should provide good wages to help the community create more middle class jobs; require utilization of the State Department of Labor Registered and Approved Apprenticeship Program and demand the highest level of safety training available to ensure safe working site and communities. The City should establish criteria for which landlords/developers are allowed to use public subsidies (HPD-administered subsidies), based on their:
 - Track record of maintaining buildings;
 - Track record of building affordable housing;
 - Track record of local community engagement;
 - Track record of working with contractors with a proven record of safety for 5 years, who don't have a record of wage theft, job misclassification or any other labor law violations, including all subcontractors, going back 5 years;

- Track record of working with contractors who don't have a record of construction quality complaints or determinations, including all subcontractors, going back 5 years.
- **Reduce barriers to tenant eligibility for affordable units.** The City should pass legislation limiting the requirements that HPD uses to determine which tenants qualify to be able to move into affordable housing. For example, people should not be turned away from affordable housing because of credit checks.
- **Enact policies that create incentives that prevent speculation and displacement and promote affordable housing development.**
 - *Pass and fund Intro 214*, providing a right to a lawyer for tenants facing the loss of their homes.
 - *Pass and fund Intro 152-A*, which would create citywide "Certificate of No Harassment" requirements, preventing landlords who have harassed tenants from getting certain permits from the Department of Buildings unless they agree to set aside part of the building as permanently affordable housing. Landlords often do renovations on apartments and buildings in order to raise rents for new tenants. This law would prevent landlords who have a history of harassment from getting the permits they need to do those renovations unless they agree to set aside a certain share of the floor space in the building as permanently affordable housing (above what might be required by Mandatory Inclusionary Housing or as a condition of receipt of any tax abatement). This model has been locally effective in the Special Clinton District, and should be expanded by requiring that DOB and HPD put a similar policy in place across the city. In addition, the policy should apply to a larger set of DOB permits.
 - *Require "landlord licenses,"* creating strict rules for which landlords or developers are allowed to operate in NYC. HPD or another city agency would determine whether a landlord can get a license based on a set of qualifications (e.g.: number of violations in other buildings they own, unpaid taxes and fees owed to the city, other buildings in foreclosure). The license would enable landlords to acquire property. If a landlord is not in compliance, the landlord would not be eligible to receive another permit and therefore unable to purchase more buildings.
 - *Publicly grade landlords and publicly display that grade in their building lobby.*
 - *Amend the Alternative Enforcement Program (AEP) to allow tenants to get a rent reduction and use a City-run escrow account when their building is in bad repair.* This is modeled on a program in LA, called the Rent Escrow Account Program. When there are violations that haven't been fixed, the city would be able to reduce tenants' rent and allow them to pay their rent into an escrow account, monitored by the city. The Landlord would not get the money until the City verifies that repairs have been done.
 - *Create a disincentive for landlords to buy buildings with the intent of selling them quickly (speculative flipping) by applying a graduated flip fee, structured like the mortgage recording fee.* The City should also help facilitate stable long-term New York City homeownership by

increasing the New York City Real Estate Transfer Taxes on all transfers to non-owner occupied (investor purchased) 1-4 family homes.

- *Fully assess a development or redevelopment project's potential displacement impact and require associated mitigation plans and fees.* The City can model this off of the California Environmental Quality Act, which currently requires an assessment of displacement related impacts for development projects above a certain threshold.
- *Track public investment at the neighborhood level and use this information to improve equity in budgeting decisions.* This can be modeled off of Portland's budget mapping initiative.
- *Strengthen the obligations of marshals in avoiding eviction of "at-risk tenants."* Right now there are provisions for elderly, sick, and disabled tenants. These provisions should be extended to include families with children under 3 and families with 2 or more children.
- *Pass Intro 3-2014, which allows the City to sue landlords for relocation expenses.* If a building is vacated by DOB, the landlord should be required to pay relocation costs.
- *Implement a "No Net Loss" policy at the City level.*
 - Conduct a baseline assessment of affordable housing units within the city, broken down by neighborhood and affordability level (by income bracket). This inventory should include information on number of units, rent level of units, household size and income of inhabitants. A moratorium on demolition, conversion, etc. should be in place until this assessment is complete and a plan to address the city's need is in place.
 - Based on the inventory, neighborhoods should set goals for preservation within each bracket by neighborhood and for the city as a whole.
- *Advocate at the state level for the creation of a good neighbor tax credit* to stabilize the hidden supply of affordable housing in our small-homes neighborhoods by offering a real estate tax abatement to owners of owner-occupied small homes who rent an apartment at below-market rates because of longstanding community ties.
- **Increase oversight of landlords and be more proactive in identifying and targeting bad acting landlords.**
 - *Monitor housing court cases, particularly in high risk displacement areas* and refer to community organizations and/or legal aid/legal services who will do additional outreach to help determine if the case is part of a larger harassment pattern.
 - *HPD should notify all owners of "zero tolerance" for harassment and poor building conditions* (meaning that the City will take legal action against the owner for either). This includes, but is not limited to:
 - HPD should send a letter to all landlords informing them of the zero tolerance policy.
 - HPD should ensure that oversight is in place so that owners of rent stabilized apartments properly register the rent, do not charge more than the legal amount, do not harass tenants

or encourage tenant turnover as a way to increase rents, and properly maintain the building.

- HPD should aggressively follow up once a determination is made that a building is physically distressed and/or tenants are being harassed – this includes aggressive and effectively targeted litigation against bad owners as well as effective use of the emergency repair program. (agency rules and regulations)
- HPD should not negotiate with landlords to reduce fines in HP or 7A cases, unless there is an equivalent monetary benefit to tenants. (agency rules and regulations)
- **Support outreach and ‘know your rights’ education by community groups to local residents.**
 - *Fund community groups to develop and carry out an outreach and information campaign to all neighborhoods, teaching tenants how to organize and form tenants associations. The funds should focus on neighborhoods currently at highest risk of harassment and displacement.*
 - *Develop materials so tenants know their rights and understand what is available to them in terms of assistance and recourse.* These materials include but are not limited to:
 - Information about 311 and the process to call regarding harassment and building conditions
 - A “what is harassment” fact sheet
 - Explanation of what rent histories are and how tenants can get them
 - Information on rent regulation and tenant’s rights
 - Information on “right to counsel”
- **Improve communication with tenants about their rights.**
 - HPD and DOB should notify residents when inspectors will be out to inspect their buildings.
 - These agencies should notify residents when HPD is taking legal action against a landlord.
- **Improve the various building inspection systems.**
 - Require building inspectors to respond to calls within 24 hours.
 - Ensure that 311 calls, particularly if multiple calls are documented, lead to a comprehensive inspection of the property by an inspector (not just isolated visit regarding the individual complaint).
 - The City should create protocol and systems for tenants to evaluate individual inspectors.
 - Implement stronger emergency repair protocol to prevent serious violations from lingering. For instance, if an inspector finds that a “C” violation still exists when they return to re-inspect, HPD should automatically send a repair team to fix the condition and should bill the repairs to the building owner.

- **Make key neighborhood data publicly available and easily accessible.**
 - Create a comprehensive list of evictions. Eviction rates should be tracked by building and by or owner.
 - Track housing-related 311 calls and identify patterns by building, neighborhood, and owner;
 - Develop a referral process from 311 calls, similar to the Legal Aid/Legal Services hotline, where tenants reporting concerns are referred to community organizations in their neighborhood for follow up service.
 - Create a comprehensive list of distressed buildings by neighborhood, with all public information such as building ownership, management, and most recent sale date.

- **Ensure local hiring, because no apartment is affordable without a job.**
 - *The City should adopt the Floor Area Affordability Bonus* described in the last section of this document.
 - *City agencies (such as HPD) and the Economic Development Corporation (EDC) should make local hiring a requirement of projects they fund.* The City should pass legislation to require this citywide, or at minimum adopt it as a policy in the rezoning communities, where the City is investing a lot of money, where the risk of displacement is high because of increased development interest, and where the existing need for jobs is great. The City currently has local hiring requirements for projects backed by the City in Sandy-impacted neighborhoods; they should do the same for the neighborhoods they are rezoning.
 - When City agencies or the EDC start projects, they put out Requests for Proposal (RFPs) for developers who want to build the projects. These RFPs must include specific local hiring standards and state that developers who are prepared to meet those requirements will be given preference in the selection process.
 - These standards should build on the standards and requirements set in the Build It Back Sandy recovery RFP:
 - *Targeted hire standards:*
 - 30% of work hours conducted by local residents
 - 15% of work hours conducted by disadvantaged local residents
 - 10% of work hours conducted by women
 - *Local Hiring Plan.* Requirement that the Contractor develop a plan that
 - Clearly demonstrates the proposer’s plan and capacity for ensuring compliance with the hiring requirements, and
 - Identifies local organizations that the Contractor will work with to establish job pipelines and career opportunities on each project.

- *Dedicated Staff.* The Contractor must provide at least one full-time staff member dedicated to tracking daily hiring at the job sites and ensuring implementation of the requirements of the Plan.
 - *Reporting Requirements.* The Contractor must comply with, in the least, monthly reporting requirements in line with Local Law 140 of 2013, known as the Sandy Tracker Bill.
- **Guarantee good wages for jobs created by the rezoning.**
 - *Pass a Community Benefits Ordinance requiring developers who receive a certain amount of subsidy or public land to negotiate a Community Benefits Agreements (CBA) with local community groups,* and condition receipt of the subsidy or land on successful negotiation of a CBA. These CBAs could be used to secure a range of community benefits, including local prevailing wage jobs.
 - *Provide real transparency on prevailing rate jobs.* When prevailing wage jobs are available, signs should be posted throughout the neighborhood, and especially in front of the job site. The notices should explain what prevailing wage is, and should be in the top 6 languages spoken in the community.
- **Provide Job Training & Education to local residents.**
 - Fund GED programs in rezoned neighborhoods to ensure local residents are eligible for NYS certified apprenticeship programs. The city must also conduct outreach so people know about training programs.
 - Provide stipends, childcare and other support to residents so they can access NYS certified apprenticeship programs.
 - Allocate funding to enable community-based organizations to provide sector-specific workforce training. The city should fund local Bronx organizations to provide training for industries with a strong presence in the Bronx. Focus trainings on fields that offer high-quality, highly skilled jobs.
 - HRA and SBS should also have job training programs and transitional job programs that train residents for jobs in the sectors where new jobs are being created.
- **Assist with job placement for local residents in need of employment by creating and funding a Local Employment Network.**
 - The City should provide funding to local community-based organizations to develop a network and hire a local coordinator to engage with developers in the neighborhood, provide trainings for local residents, screen candidates for positions in upcoming projects,

and make referrals. This would be similar to the Lower East Side Employment Network, which emerged as a result of a development boom on the LES.

- The City should list Jerome Ave Local Employment Network as the preferred hiring source for its projects.

II. BUSINESS DISPLACEMENT

The proposed rezoning corridor is a complex economic ecosystem that includes tenant businesses, subtenant businesses, and a large workforce with high percentages of immigrants who derive their livelihoods in a variety of arrangements, including full time, part time, and “per job” commissions. These conditions are poorly captured by traditional data sets. When considering the analysis of business and worker displacement, it will be essential for the scope of the DEIS and the DEIS not to rely on standard methods of “behind the desk” data sets and to instead incorporate field data that is reflective of the reality of businesses and workers in the rezoning corridor.

A. ANALYZE

- **The City should work with the Bronx Coalition for a Community Vision to identify the appropriate data methods to use** when assessing the number of businesses and associated jobs within the Jerome Avenue corridor and how to measure impacts on them.
- **The Scope of the DEIS should explicitly include that its commercial analysis will incorporate the data, findings and key takeaways from the currently underway Commercial District Needs Assessment** (funded by Department of Small Business Services).
- **The Scope and DEIS should reference surveys conducted of actual businesses when conducting analysis on numbers of firms and jobs within rezoning area.** Surveys conducted by organizations such as CASA, UAMA, WHEDco, and Davidson that have been conducted as part of the Commercial District Needs Assessment should be utilized by DCP.
- **The Scope and the DEIS should include an explicit quantitative analysis of the number of auto-related businesses and jobs that are currently located in the “retention areas” and the number and of auto-related businesses and jobs that are currently located in the corridor outside of those retention areas.**
- **The DEIS should analyze the *change* in the number of auto-related businesses and workers in the corridor since DCP’s initial field study** and incorporate those trends into its displacement analysis.

- **To the extent that the City references datasets, the City cannot rely solely on QCEW data to base its analysis regarding numbers of firms and numbers of jobs.** Due to large amounts of data suppression at small geographies, the City’s use of QCEW data at such a small geography may present a large margin of error and is likely to undercount both jobs and businesses in the area to be rezoned.

- When assessing displacement:
 - *The City should conduct a business displacement analysis for each of the sub areas identified by DCP.* These sub areas should include a buffer zone that is reviewed and accepted by the community as an accurate representation of breaks in commercial catchment zones.
 - *The City should conduct a soft site analysis that would show current land value in existing building conditions versus anticipated land value under fully built out conditions as determined by area rezoning.* This analysis should also provide an estimated price per square foot for renters under existing and future conditions since the cost of space is likely to determine what kind of business can exist in the new development.
 - *The City should take into account a full range of variables when assessing which businesses could be indirectly displaced by rezoning.* These variables should include business tenure and whether the business owns or rents.
 - *The EIS should evaluate the impacts of displacement of auto workers in the context of citywide trends and the shrinking availability of, and increased competition in, land that is zoned appropriately for auto uses.* It should evaluate prospects for relocation by considering actual vacancy rates and the competitive disadvantages that auto related businesses face against other uses that are allowed in C8, M1, M2, or M3 zones that can pay much higher rents.
 - *The City should disclose real job numbers for any businesses identified as being likely to be directly displaced by rezoning.*
 - *The City should explicitly disclose which businesses would be directly or indirectly displaced from rezoning are family-owned and operated versus which are chain store businesses.*

B. MITIGATE

Given the strong presence of factors that could lead to indirect business displacement, the City should analyze, disclose, and adopt additional strategies to mitigate the business displacement that the rezoning will induce, including:

- **The City should consider changes to its zoning plan to minimize the amount of displacement that businesses and workers experience.**
 - The DEIS should include a detailed description of the specific, quantitative goals of the “retention areas” in the plan and a breakdown by sector of number and types of businesses

that are located there now, number of workers, as well as a description of the range of uses that will be allowed to locate there as-of-right under the existing zoning

- The DEIS should include a detailed description of the as-of-right uses allowed in the designated retention areas, the typical rent levels that those uses can generate, and recommendations to how retention area zoning could be strengthened to achieve stated goals of retention areas.
- **The City should provide relocation support for those businesses that are displaced through the rezoning.** To do this the City should:
 - Include in the Scope of the EIS and the DEIS an analysis of City-owned, vacant, appropriately zoned, and otherwise suitable potentially viable sites for potential relocation, at various sizes, ranging from individual business level to sites that could accommodate a cluster of businesses and/or a vertical arrangement. These should be actual sites in the Bronx and/or Upper Manhattan and the analysis should include an evaluation of factors that rank the locations' viability.
 - Input from auto merchants in the area should be incorporated to identify criteria for collective relocation (such as size, distance from original location, building type, distance from transit).
 - Identify a suitable location based on mutually agreed upon criteria and sufficiently fund investments in the site and costs of business relocation.
 - Relocate businesses to nearby areas where housing is not being considered and manufacturing businesses have more protections, such as Industrial Business Zones in the Bronx (for example, Bathgate, Zerega, and Hunts Point).
 - Provide financial and technical assistance, including up front business loans, for local, small businesses in the rezoning area to help cover the cost and needs of relocation. This would apply to local retail and restaurants and auto related businesses.
 - Communicate with businesses in collective forums and groupings, recognizing cooperative structures.
- **The City should ensure that local, small businesses can be physically located in and thrive in the new, rezoned area.** To do this, the City should adopt the zoning text provisions described at the end of this document, and:
 - Limit increases in rents to no more than 5% in the rezoning area through all legal mechanisms, including requirements on developments that receive public subsidy, and throughout the City through citywide legislation.
 - Advocate with NYS to pass legislation that requires all property owners to give mandatory lease renewals for expiring leases.

- **The City should give preference for return to local businesses.** To do this, the City should create a system to offer existing, interested businesses in the proposed rezoning area a “right of first return” or preference in occupying new space(s) created by development. To support this policy, the City must consult with existing small local businesses and craft its zoning plan accordingly, as described at the beginning of this document.

- **The City should provide training for workers and owners of local businesses.** To do this, the City should:
 - Increase funding for outreach and training programs that help auto businesses in the area obtain the necessary licenses and meet environmental standards. The City should partner with NYS Department of Environmental Conservation and build on existing pilots programs to accomplish the goal of environmental compliance and improved environmental performance.
 - Offer trainings in the dominant language of the workers and support the development English language skills.
 - Provide training in business planning and development, as well as trainings that will equip workers to adjust to changes in auto repair technology.
 - Provide training in the development of worker cooperatives, which are a legal way for undocumented immigrants to earn a living.

- **The City should develop a citywide policy approach that adopts best practices to support the auto sector as a whole.**
 - Conduct a study of the auto sector corridors throughout the five boroughs that assesses the real needs of workers and owners and the unique challenges that they face. The study should be advised by a Steering Committee that includes auto business owners and workers, and conducted by an entity that can fairly value the contributions of the sector to the city as a whole, including the necessary service it provides to consumers and as part of the city’s infrastructure system, the entrepreneurship and employment pathways it creates, and economic contribution.
 - Develop a coherent policy that addresses the sector’s current needs, plans for and equips workers and businesses for industry changes, and makes recommendations for citywide land-use policies that address those realities.
 - This study should take into account citywide trends and the shrinking availability of, and increased competition in, land that is zoned appropriately for auto uses.

- **The City should pass legislation making it illegal to harass small businesses and other non-residential tenants.**

III. COMMUNITY FACILITIES

A. ANALYZE

- **The City should evaluate future impact of proposed changes on each neighborhood.** For each neighborhood that will be affected by the rezoning, DCP and related agencies should create a profile that analyzes and addresses increased demand for community facilities and services that the rezoning will create. Each neighborhood profile should:
 - Explain the impact of a proposed zoning change on housing, schools, parks, transportation, and other facilities and services in the area.
 - Include clear proposals of how and when the future needs will be addressed, with details specific to each neighborhood.

- **Schools: the City should carefully analyze the impact of the rezoning on schools.**
 - *The City should not take into account school seat capacity within the DEIS for projects under the DOE five year capital plan unless site preparation or construction has commenced for those projects.*
 - *The City should account for the space being consumed by charter schools within public school buildings and increased need for charter school space due to proposed rezoning project and should adjust estimates.*
 - *The City should take into account input from the CSD Superintendent, local Community Education Council, community education activists and socials service and health providers operating in school buildings on the growth patterns in the impacted schools in the study area.*

- **General Facilities:**
 - *The City should take into account space needs of neighborhood anchors that operate within schools in addition to the school seats themselves (i.e., Beacon, school based health clinics, etc.).*

- **Libraries:**
 - *The City should expand its library analysis beyond the current holdings-to-population ratio as the only measure of analysis to be used in determining a library's utility.*
 - *The City should incorporate metrics into its analysis that display the services libraries provide in terms of community space and educational access.*

- **Child Care:**

- *In assessing significant impact on childcare facilities, the City should review waitlist information to better understand to what degree which childcare facilities are already seeing more demand than they can accommodate.*

B. MITIGATE

The City should analyze, disclose, and adopt mitigation strategies to ensure that community facilities are properly developed and funded, including:

- **Community facility zoning**, as described more fully in the next section of this document.
- **Subsidies and programmatic commitment** to support the development of new community facilities and neighborhood amenities.
- **PILOT fund**, as described more fully in the next section of this document.
- **A Community Benefits Ordinance** that would require developers who receive a certain amount of subsidy or public land to negotiate a Community Benefits Agreements (CBA) with local community groups, and condition receipt of the subsidy or land on successful negotiation of a CBA. These CBAs could be used to secure a range of community benefits, including additional amenities, open spaces, schools, and local jobs.

IV. PROVISIONS TO BE INCLUDED IN THE ZONING TEXT

The Scope of the EIS and the EIS itself are a part of the land use review process that contributes to developing the ultimate plan and zoning text for the neighborhoods that will be affected by City action. To the greatest extent possible, the City should include provisions to advance community interests within the zoning text, to ensure that the needs of current residents, low-income tenants, and small local businesses are protected long into the future. The Bronx Coalition has already submitted its Zoning Text Asks to the Department of City Planning, and we ask that the City's plan for this area include the following critical provisions:

- **Choose the MIH Option that best meets the need of the current community.** The City should choose the MIH Option that provides for 25% of new construction units at 60% AMI, as this is the only Option that mandates a deeper affordability band (10% of units at 40% AMI). The City should also make available the 20% of units at 40% AMI alternate, and require that the developers of any sites subsidized by HPD elect this MIH option.
- **Create a special purpose district** that:
 - Offers developers a Floor Area Affordability Bonus in exchange for building deeply affordable housing - a minimum of 50% of total units - that reflects the specific rent needs of our

communities and requires developers to hire 30% of workers from the local community, utilizing state-certified apprenticeship programs to ensure well-trained and safe workers. To make sure that developers will take the deal, the City should limit the amount of additional residential density permitted as-of-right, which will leave developers with a greater incentive to take a density bonus option. Implementing the FAAB bonus for the Jerome Avenue rezoning is especially important given the fact that MIH will not reach income levels reflective of the current community needs - even 40% AMI is above our neighborhood median income - and HPD subsidies, though a critical way of reaching deeper affordability in the years immediately after a rezoning, are voluntary, and developers are unlikely to take them as the local housing market shifts.

- Creates a Certificate of No Harassment requirement to curb harassment of rent-stabilized tenants. This should be incorporated into the zoning text, as it is in the Special Clinton District in Hell’s Kitchen, if a strong citywide anti-harassment policy has not been passed by the time the Jerome Avenue zoning text is finalized. To effectively counter the profit motive behind harassment, this CONH requirement must include an affordable housing “cure” that requires developers who are found to have harassed tenants to build deeply (below 30% AMI) and permanently affordable housing, above what they are required to build by MIH or as a condition of receipt of tax abatements or City subsidies. If a future citywide policy does not include a “cure” provision, such a provision must be included in the Jerome Avenue zoning text.
- Ties the creation of necessary community facilities to increases in residential density. The City should require developers who want to build additional housing to set aside space for schools, community space, senior centers, open space, and other necessary community facilities to ensure that the neighborhood has enough of what it needs when new residents come in. This type of zoning has been adopted in other communities before, and it would help ensure that the City’s funds for community facilities go further by eliminating the City’s costs to purchase new sites for necessary facilities (see attachment).
- Establishes a Payment in Lieu of Taxes (PILOT) fund to ensure that the economic benefits of development stay within the rezoning area, rather than going to the City’s general coffers. This fund will help address local needs, including the need for anti-displacement initiatives, deeply affordable housing, and community facilities (see attachment).
- **Ensure that local, small businesses can be physically located in and thrive in the new, rezoned area.** To do this, the City should consider a variety of zoning tools, including:

- Identify existing interested business tenants and document their needs to shape the design and implementation of a small business “right of return” system. Having a strong understanding of the space needs of current local businesses will help the City craft zoning text provisions that ensure that appropriate spaces are incorporated as part of the new zoning text.
- Adopt Special Enhanced Zoning Districts that limit commercial uses to the types commonly used by local residents, such as grocery stores.
- Limit the size of new commercial spaces in order to create opportunities for local small businesses and not just large, corporate chain stores. This can be achieved through frontage requirements, which can require a minimum number of storefronts in an area (effectively reducing the size of the establishments) and can limit the size of the storefront for certain uses, like banks.
- Create a preference for locally-owned businesses and attach a requirement for new construction over a certain size to set aside a portion of its retail space for that retail.
- **Select an area in the proposed rezoning area where auto-related businesses— including auto parts, security and audio stores—can remain and be protected.** To do this the City should, in consultation with the community:
 - Develop the reasoning and criteria for selecting the size and location for this protected area.
 - Identify the best mechanism for protecting and strengthening this area, considering a Special District designation, and taller heights for commercial buildings.
 - Clearly define the total amount of commercial space that should take place in this area.
 - Prohibit specific uses that would otherwise be permitted by the current zoning uses but that would compete with the intended goals of the area (such as hotels).

Thank you for your consideration of our suggestions, which we feel are vital to adequately assess the full impact of the proposed rezoning and ensure that the current community benefits from the changes to come. If you have any questions about our suggestions, we are happy to provide additional information upon request.

DOCUMENTS ATTACHED TO THIS LETTER:

- **Zoning Text Asks document (previously sent to DCP)**
- **Document Describing Community Facility Zoning**
- **Document Describing Proposed Community Benefits Ordinance**
- **Document Describing Use of PILOT Fund**

BRONX COALITION FOR A COMMUNITY VISION ZONING TEXT ASKS

DEEP AFFORDABILITY OPTION IN MANDATORY INCLUSIONARY HOUSING

What It Does: Creates a new "deep affordability" Option within the proposed Mandatory Inclusionary Housing policy that requires 30% affordable housing at 30% AMI. Adopting this Option for the Jerome Avenue rezoning would guarantee that all new residential construction creates a significant share of deeply affordable housing that matches the needs of current residents.

How It Works: The City's current MIH proposal includes only three Options, which would require developers to set aside 25-30% of all construction as housing permanently affordable at an average of 60-120% AMI. Although a policy that requires the creation of permanently affordable housing is a big step in the right direction, 60-120% AMI is way above what most current residents of the Southwest Bronx can afford to pay. This means that once developers stop taking City subsidies that require greater affordability, *all* of the new housing that's built in the community will be beyond the reach of current residents.

To address this, the City should add an MIH Deep Affordability option of 30% affordable housing at 30% AMI, and implement that Option for this rezoning. MIH must include at least one Option that addresses the needs of the NYC households that make less than 30% AMI, or \$25,000 a year – households that represent a quarter of the City and a huge share of the residents of the Southwest Bronx, but are completely left out by the City's existing housing programs. In order to truly meet the needs of the Southwest Bronx, additional tools will be needed to get even more deeply affordable housing, but a stronger MIH program would provide a significant part of the solution.

Adopting this Deep Affordability option for the Jerome Avenue rezoning would require additional subsidy, but the same is true for the MIH Options already proposed by the City. And additional investment is worth it to ensure that the Southwest Bronx remains a community accessible to low-income and working-class people, long into the future.

Floor Area Affordability Bonus: AFFORDABLE HOUSING & GOOD, LOCAL JOBS

What It Does: Ensures that the community has real affordable housing and high quality local jobs.

How It Works: Create a special district and grant developers a floor area bonus only if they commit to building deeply affordable housing (a minimum of 50% of total units) reflective of the neighborhood median income, hiring 30% of the workers from the local community, and utilizing state-certified apprenticeship programs to ensure well trained and safe workers. To make sure that developers would take the deal, the City should limit the amount of new residential construction that's permitted as-of-right, creating more incentive to take a density bonus option.

What's the Model? This floor area bonus system would essentially be a variation of the existing Voluntary Inclusionary Housing (VIH) program, with some new twists. First, instead of giving away significant density and then offering a bonus with strings attached, as the City often did in past neighborhood rezonings where VIH was implemented, the City should limit the amount of density that is granted as-of-right under the Jerome Avenue rezoning. That way, developers will be more likely to take the bonus with the FAAB conditions attached. Second, the FAAB model would not only require mandatory affordability levels – similar to VIH, but with deeper and greater affordability – but would also add the requirement of good, local jobs.

Like VIH, the FAAB model does not pose legal problems because developers don't have to take the deal if they don't want to – they can just stick with their existing building rights. Although the City has never previously inserted hiring-related requirements into the zoning text, we believe that doing so is within the City's broad zoning powers and that the FAAB model would be an important way of ensuring that the rezoning actually benefits the community and that construction creates high-quality jobs for local New York residents.

Sample Text for Floor Area Affordability Bonus:

PURPOSE AND NEED FOR THE PROPOSED ACTION

The proposed action seeks to facilitate vibrant, inclusive residential neighborhoods with a wide variety of local and regional commercial options, job opportunities for local residents, safe working conditions at construction sites and well-trained construction workers, and attractive streets that are safe and inviting for residents, workers, and visitors.

The Proposed Actions reflect DCP's on-going engagement with Community Boards 5 and 16, local elected officials and community residents and stakeholders to achieve the following land use objectives:

- Create opportunities for new residential development with up to 100% permanently affordable housing
- Create opportunities for local job creation for disadvantaged local residents. Local job creation ensures that people are going to be able to afford to continue to stay in the community even if it changes.
- Create opportunities for safe working conditions for construction workers and the surrounding community through state-certified apprenticeship training programs

Create opportunities for new residential development with up to 100% permanently affordable housing

Changing the zoning to allow for up to 100% affordability at the neighborhood median income at higher densities is intended to significantly expand the supply of housing, particularly at a rent level that the majority of the existing residents can afford. The Proposed Actions would promote the development of affordable housing by requiring at least half of new housing units in high-density residential developments to be permanently and deeply affordable at local AMI levels, which is not required by current zoning or the proposed Mandatory Inclusionary Housing (MIH) policy.

Create opportunities for local job creation for disadvantaged local residents

Creating an optional density bonus program to allow for local job creation is intended to significantly increase the job opportunities available for disadvantaged local residents and forestall displacement that might otherwise occur as a result of high unemployment rates and rising rent pressures. The Proposed Actions would promote the job opportunities available to local residents by requiring 30% of hours worked on each project to be done by disadvantaged local residents.

Create opportunities for safe working conditions for construction workers and the surrounding community through state-certified apprenticeship training programs

Creating an optional density bonus program to allow for apprenticeship utilization for construction workers is intended to significantly increase the level of training and the safety of worksites in the rezoned area. The Proposed Actions would promote the training opportunities for new construction workers by ensuring they are trained through state-certified apprenticeship programs, leading to improved safe working conditions. It will also promote the safety of the surrounding community, which will be subject to significant amounts of redevelopment.

COMMUNITY FACILITY ZONING

What It Does: Ensures that the community has the schools, health centers, community centers, parks, and other spaces that it needs to support new and current residents. Ties the development of such facilities to new housing construction to make sure that increases in population are matched by increases in essential services.

How It Works: The population in the Southwest Bronx will increase dramatically after the rezoning, placing additional strain on our schools, transportation, roads, parks, community centers, and other community facilities. It's important that there be a plan to create more capacity as the neighborhood's population grows, but since new residents won't flood in all at once, it's difficult to know now exactly how much of each of these things the community will need, and when. But, if the City waits until after the rezoning to acquire the land and buildings that will be needed to create more community spaces, prices may have gone up a lot – making it difficult or impossible to build the facility.

To address this, the City should put a rule in the zoning plan that will make community facility space a required part of new construction. One way to do this would be to link the square footage of a certain use to a requirement for an equal or greater amount of square footage for the desired community facility. This model was used in the Special Harlem Waterfront District to tie the development of commercial space to an equal or greater amount of space for desired uses in the district, including community facilities. Another option would be to include a zoning text provision that requires developments in the area to provide easements for certain public amenities, the way the City's Special Transit Land Use District requires a set-aside for subway-related uses.

A third model the City could put in the zoning text is a requirement that obligates the Department of Buildings to assess whether there are adequate community facilities in

the area before giving building permits to developers who want to add more housing in the community. If the community has enough of what it needs, the developer can get the permit and go ahead with construction. If something is lacking, the developer will need to set aside space in the new development for a community facility. Alternatively, special requirements can be attached to development in an area that has infrastructure needs, as was done through Lower Density Growth Management Areas in Staten Island in the Bronx.

Finally, the zoning text can provide that community facility space will not count against all of the buildable space the developer has – so the developer will be able to build as much as he would have otherwise – but the community facility space will be *added* to help meet the community's needs. The city agency that wants to use the space – for example, the Department of Education, if a school needs to be built – could then pay for the construction costs related to building the community space, and will pay the developer reasonable rent for the space afterward. This was done in the Hudson Square Special District.

What's the Model? Special Harlem River Waterfront District, Special Transit Land Use District, Lower Density Growth Management Areas, Hudson Square Special District.

Sample Text:

<http://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-text/art08c07.pdf>

<http://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-text/art09c05.pdf>

<http://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-text/art08c08.pdf>

http://www1.nyc.gov/assets/planning/download/pdf/plans/ldgma-si/ldgma_si.pdf

PAYMENT IN LIEU OF TAXES (PILOT) FUND

What It Does: Guarantees that revenues generated by development stay in the community instead of going to the City's general coffers.

How It Works: Create a special district and a PILOT fund to keep revenues generated by development in the community.

What's the Model? In New York, PILOTs are usually offered as incentives to companies to induce them to locate their business in New York City. But they can also be used to keep the profits from development in a neighborhood that is facing rapid change. Either way, the basic idea is the same: companies enter into agreements to receive exemptions from property taxes and instead make PILOT payments, which are lower than the tax payments would have been.

On Manhattan's Far West Side, the City created a PILOT to harness private funding to finance the extension of the 7 subway line and the construction of new streets and parks, part of an ambitious plan that also included significant new office space and

housing. A new local development corporation, the Hudson Yards Infrastructure Corporation (HYIC), was created to issue bonds for infrastructure construction. The bonds were backed by the revenue the project would create – most significantly, PILOT payments made by private developers building within the area.

The rezoning of the area allowed for significantly more building and offered the prospect of huge profits for developers; the PILOT structure aimed to ensure that some of the revenue generated by these new buildings stayed in the area and supported public services and amenities. Any PILOT funds in excess of what was needed to repay the bonds would flow back to the City. To date, \$3 billion in bonds have been issued to support subway construction and parks in the area, and debt payments now run over \$150 million a year. Until recently, PILOT revenues were not sufficient to cover the bond payments, and since 2006, the City has been forced to spend more than \$350 million of its budget to make payments on the bonds. However, development in the area has increased, and this year, for the first time in a decade, the PILOT funds will be enough to cover the bond payment without any additional funding from the City.

There are two basic ways that PILOTs can be structured to generate revenue for an area. Under the first option, the City takes out bonds and then uses the PILOT funds to pay back those bonds. The advantage of this structure is that it enables the City to plan in advance for the infrastructure or services it wants to fund through the PILOT money, and then secure the project funding before the PILOTs are collected. The other way that cities can structure PILOTs is through a pay-as-you-go set-up. Under this structure, the City will not take out loans to fund infrastructure or services, but it will apply whatever PILOT funds it receives toward the designated uses.

Although it's important to recognize the practical concerns about PILOT funds – for one thing, buildings that receive tax abatements like 421(a) are not subject to taxation for many years, so they will not generate revenue for a PILOT – PILOTs can do what no other financing mechanism can: keep revenues generated from development in the community where that development is taking place. This is critical for all communities facing rezonings, since absent a PILOT, each rezoned neighborhood may wait years for necessary infrastructure to be developed, while developers grow rich off of their new development rights and the City turns its attention elsewhere.

CERTIFICATION OF NO HARASSMENT REQUIREMENT

What It Does: Prevents landlords from harassing rent-stabilized tenants by creating serious disincentives for harassment.

How It Works: This zoning text provision would create a rule barring landlords from receiving certain building and construction permits on sites where harassment is found to have occurred – *unless* the landlord agrees to set aside part of the building as permanently affordable housing.

What's the Model? A requirement that landlords receive a Certification of No Harassment or take the affordable housing "cure" is already in place in Hell's Kitchen in

the Special Clinton District. A similar requirement could be adopted in the text for the Jerome Ave rezoning, or as citywide legislation.

The basic idea is that the Department of Buildings *should not give building or alteration permits* to landlords who have harassed tenants – unless those landlords agree to build new affordable housing. Landlords *should not be able to profit* from pushing tenants out or making their lives so miserable that they leave. If landlords know they cannot make a lot of money by harassing tenants, they won't do it as often. This new rule would help prevent harassment because landlords will not want to have to make parts of their buildings permanently affordable. And if landlords harass tenants *despite* the new rule, they will have to build affordable housing to pay for what they've done. Either way, this rule would help ensure that low-income people can stay in the neighborhood, even as it changes.

These new rules would require the City to keep a list of suspicious landlords who have many maintenance code violations, housing court cases against tenants, reports of bad behavior from community groups, and other factors suggesting that the landlord might be harassing tenants. If a landlord from this list applied for a building permit from the Department of Buildings, the landlord could not get the permit right away – first, there would have to be a *hearing* to figure out whether the landlord had harassed tenants. Building residents and other people in the community would have the chance to testify at this hearing. If the landlord is found to have harassed tenants, the landlord would *not* be able to get the building permit from DOB unless they agreed to set aside part of the building as new, permanently affordable housing.

Sample Zoning Text: <http://www.nyc.gov/html/dcp/pdf/zone/art09c06.pdf>

PROTECT SMALL LOCAL BUSINESSES

SELECT AN AREA WHERE AUTO BUSINESSES CAN REMAIN & BE PROTECTED

What It Does: Manipulates market conditions by maintaining the existing zoning where businesses are located to prevent competition from new competing uses and may further limit existing competing uses in the protected area.

How It Works: Specifications for limitations on uses can be written in through a Special Enhanced Zoning District

What's the Model? See the section below on prescribing and/or limiting uses.

Sample Zoning Text – Special Enhanced Commercial District:

<http://www.nyc.gov/html/dcp/pdf/zone/art13c02.pdf>

CREATE OPPORTUNITIES FOR SMALL LOCAL BUSINESSES, NOT JUST LARGE CORPORATE CHAINS

Multiple mechanisms are needed to accomplish this. Three methods that operate through zoning include:

Size caps

What It Does: Limit the size of new commercial spaces in order to create opportunities for local small businesses and not just large (often corporate chain stores) that can out-compete for rents and drive up prices in the overall area. These limits: a) make the area less attractive to large foot-print chain stores which often operate on a formula for required square footage and also b) can contribute to limiting the escalation of commercial rents that often follows when multiple chain stores site in a neighborhood.

How It Works: When the real estate market picks up (often facilitated by a rezoning), small local businesses may be displaced by an influx of larger businesses seeking to capitalize on the new market and newly created spaces in new construction. These businesses can pay higher rents than long-standing businesses and may conflict with the needs or character of the neighborhood. A Special Enhanced Zoning District can shape the nature of a commercial district by limiting the size of new commercial spaces in order to support smaller storefronts.

What's the Model? Some cities have adopted size caps to limit big-box stores. One way to do this locally is through "frontage requirements" in zoning. These can require a minimum number of storefronts in an area (effectively reducing the size of the establishments) and can limit the size of the storefront for certain uses, like banks.

Sample Zoning Text – Special Enhanced Commercial District:

<http://www.nyc.gov/html/dcp/pdf/zone/art13c02.pdf>

Zoning for Businesses that Serve Local Needs

What it does: Certain designations in the Commercial Zoning Code (C1 and C2) limit the commercial uses to neighborhood serving retail. Within those categories, further restrictions could be applied through a Special Enhanced Commercial District.

How It Works: The zoning designation of a commercial overlay defines the allowable uses for ground floor commercial establishments in mixed-use buildings, as well as parking requirements. There are standard categories for neighborhood-serving retail that could be further limited through language in a Special District.

What's the Model?: The Special Enhanced Commercial District on Amsterdam and Columbus Avenues in Manhattan sets aside a minimum percentage of ground floor space that *must* be used for the sale of fresh food and ties these to size of the establishment.

Sample Zoning Text: <http://www.nyc.gov/html/dcp/pdf/zone/art13c02.pdf>

Set-Asides for Small Businesses

What it does: Compel developers to devote space to local retail establishments

How it works: Creates a preference for locally-owned businesses and attaches a requirement for new construction over a certain size to set aside a portion of its retail space for that retail. In the model described below, “qualified locally-owned” businesses were identified by DSBS and the Community Board, with leasing preferences given to businesses within that Board and secondary preferences to those in surrounding Community Boards.

What’s the Model? This idea was proposed by community as part of 125th Street Rezoning. It was not ultimately not adopted through the zoning, but the concept eventually made it into the East 125 Street Development RFP.

Sample Text:

<http://www1.nyc.gov/assets/hpd/downloads/pdf/125thRFPFinal.pdf> (page 10)

<https://www.nycedc.com/sites/default/files/files/rfp/qadocuments/A%20West%20RFP%20Info%20Session%201.14.16.pdf>

ADOPT SPECIAL ENHANCED ZONING DISTRICTS THAT LIMIT COMMERCIAL USES TO THE TYPES COMMONLY USED BY LOCAL RESIDENTS

This can be accomplished by at least two different approaches to a Special Enhanced Zoning District a) prescribing uses or b) limiting uses.

Prescribe uses

What It Does: Narrows the allowable uses in a local-serving district by specifically naming the uses that are allowed in the vision for retail in the area.

How It Works: As part of a Special Enhanced Zoning District that can accomplish various goals simultaneously, it spells out the specific eligible commercial uses for an area and prohibits uses that are not part of the community vision for retail in the area.

What’s the Model? Special Madison Avenue Preservation District protected specialty shops by mandating that the ground floor of buildings on Madison Avenue be occupied by selected uses, such as barber shops, beauty shops, food stores, laundromats, and hardware stores.

Sample Zoning Text: <http://www.nyc.gov/html/dcp/pdf/zone/art09c09.pdf>

Limit uses

What It Does: Narrows the allowable uses in a local-serving district by prohibiting them outright or places restrictions uses that are not desired in the vision for retail in the area.

How It Works: As part of a Special Enhanced Zoning District that can accomplish various goals simultaneously, it spells out excluded commercial uses for an area and/or uses that are subject to specific requirements (such as limited size storefronts for banks on the Upper West Side or occupation of second floors).

What's the Model?

The Special Enhanced Commercial District on the Upper West Side (6/28/2012) and the 125th Street Corridor (4/30/2008). Branches of major banks were beginning to dominate the commercial space on Amsterdam, Columbus, and Broadway at the expense of retail diversity and accessibility to goods and services. The area's new zoning limits the width of new banks to 25 ft. (less than a third of the width of bank branches opened in recent years), and protects small business by requiring a minimum of two non-residential establishments for every 50 ft. of street frontage. In East Harlem, banks were similarly restricted along with office, hotel, and other "non-active" uses. Arts uses were encouraged by the creation of an arts category and the requirement that developments with more than a certain size of floor area (60,000 sq ft) must include 5% of that floor area for arts uses.

Sample Zoning Text:

Special Enhanced Commercial District:

<http://www.nyc.gov/html/dcp/pdf/zone/art13c02.pdf>

Special 125th Street District:

http://www.nyc.gov/html/dcp/pdf/125th/125thstreet_proposed_text_amendment_sept24.07_legal.pdf

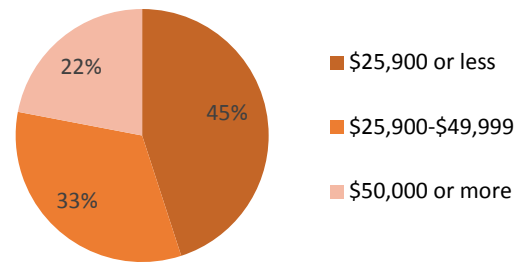
WHAT SHOULD REAL AFFORDABLE HOUSING LOOK LIKE?

How does the government define affordable housing?

The government says housing is affordable if tenants pay no more than **30% of their income towards rent**. *But 30% of \$30,000 is very different than 30% of \$250,000!* So when the government talks about creating affordable housing, we have to ask, **affordable for who?**

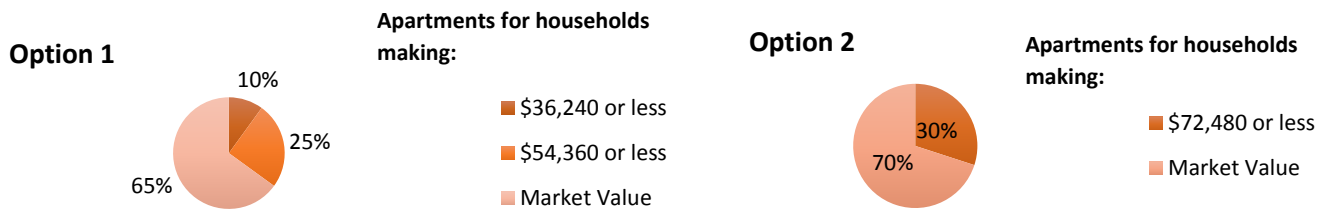
The government uses “area median income” (AMI), to create affordable housing programs. The AMI for the New York City are is \$90,600 for a family of four. The average income for a family of 4 in the neighborhoods around Jerome Ave is about \$25,000 – about 30% AMI. So when the government talks about subsidizing affordable housing—we should ask, will it be affordable to Bronx residents?

Income of Residents in CB 4 & 5



So how will the government create this “affordable housing”?

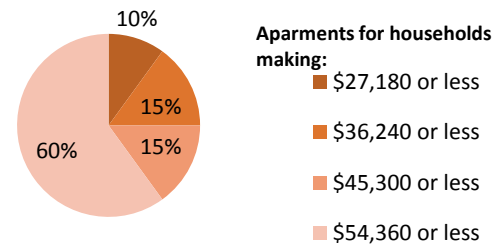
The City’s newest policy is called Mandatory Inclusionary Housing (MIH). MIH requires developers to set aside 25-30% of units in a new development as “affordable housing”. MIH sets the levels of affordability. There are two main options that Bronx developers will use:



MIH won’t be affordable to most Bronx tenants! What else can the government do?

The government can offer more subsidies to developers and require them to build housing that is affordable to people with lower incomes. These requirements are set in a document called a “term sheet.” Right now, the term sheet that creates the most affordable housing for low income people is called ELLA (Extremely Low and Low-Income Affordability). It breaks down like this:

Distribution Of Apartments



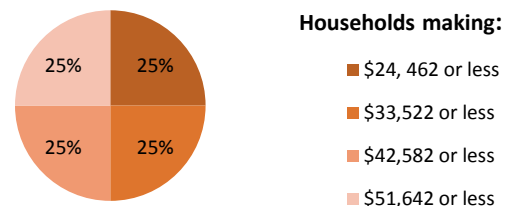
BUT ELLA IS STILL NOT ENOUGH!!!

78% of local residents don’t make enough to apply for the affordable housing. Plus local hire and worker safety aren’t guaranteed.

What SHOULD affordable housing look like?

ELLA and MIH won’t create affordable housing for Bronx residents affected by the Jerome Ave Rezoning. Unless we create something new, there is currently no mechanism to create affordable housing that reflects the needs local residents! We have been working with non-profit developers to create a better term sheet, one that will achieve **REAL AFFORDABLE HOUSING!!** Our new term sheet will make housing affordable for local residents!

Distribution of Apartments



WE NEED TO ORGANIZE TO GET WHAT WE DESERVE!

For more information, call: **Susanna at 718-716-8000 x125; s.blankley@newsettlement.org**
www.bronxcommunityvision.org

NOTHING ABOUT US, WITHOUT US, IS FOR US!

BRONX COALITION FOR A COMMUNITY VISION



POLICY PLATFORM

OCTOBER 2015

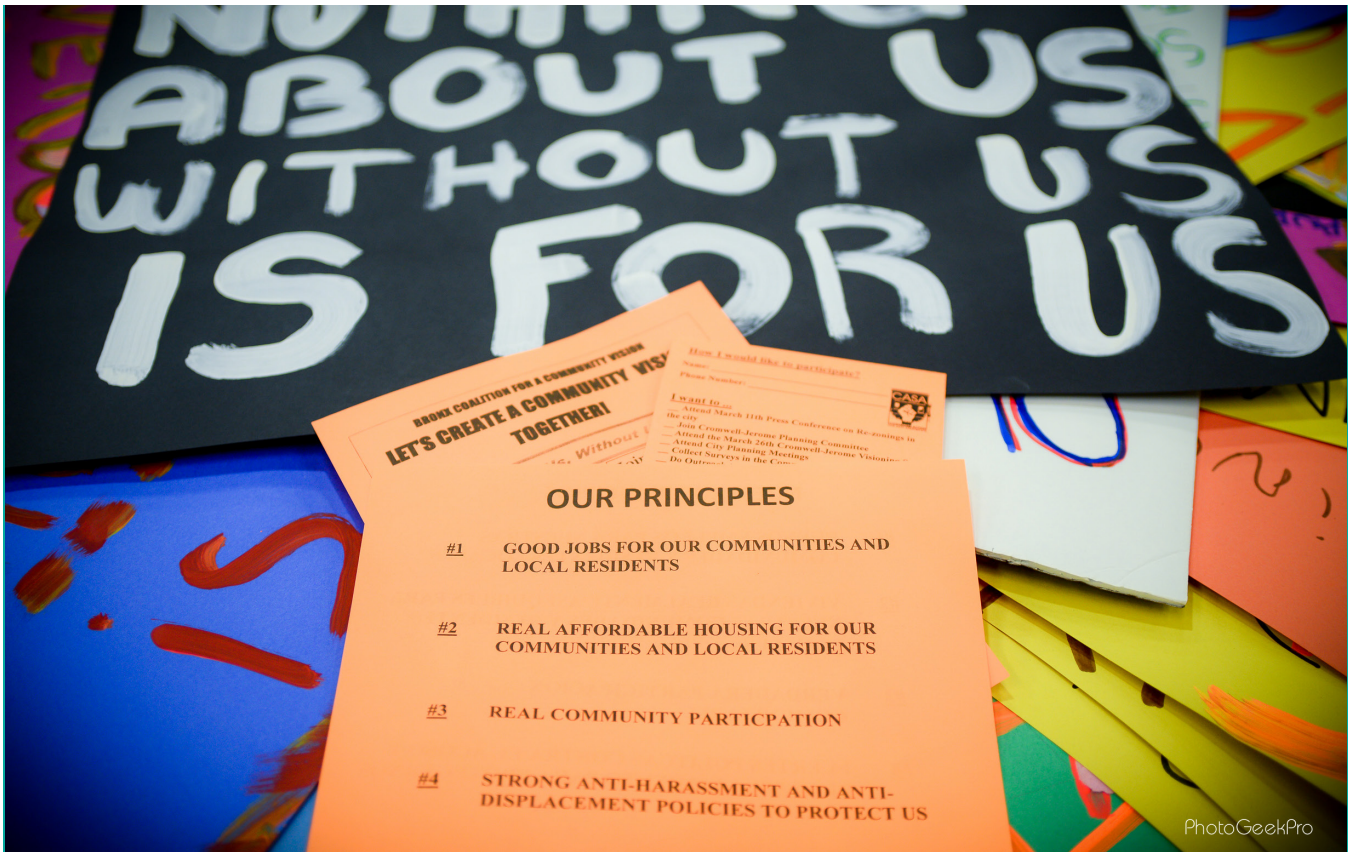


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INTRODUCTION

BACKGROUND

In May of 2014, the Mayor’s Housing Plan was released, laying out the goal to build and preserve 200,000 units of affordable housing over 10 years. Central to the success of the plan is the rezoning of 15 neighborhoods in order to facilitate the construction of new residential housing. In September of 2014, we learned that 73 blocks along Jerome Avenue in the Bronx, from 167th to 183rd streets, were being studied by the City to see how the current regulations of the mostly industrial and commercially zoned land could be changed to allow for the building of residential housing.

Most of the land in the Jerome Avenue study lies in the poorest urban congressional district in the country, where the average income for a family of four is \$25,000 ¹, almost all of the housing is rent stabilized and close to half of residents pay more than 50% of their income towards rent, making them severely rent burdened.² A substantial portion of the more than 3,000 workers that run the businesses along Jerome Avenue are immigrants, many are not officially counted.³

Over the last few decades, the history of the neighborhood for many South Bronx residents is one of disinvestment and displacement. Many have lived through years of fire, where the South Bronx lost 80% of its housing stock, entire neighborhoods were redlined and fire departments were defunded and closed. Many others have moved to the Bronx in the last few years because they could no longer afford the neighborhoods where they grew up, like the Lower East Side and East Harlem.

These South Bronx residents are informed by history and determined to ensure that the rezoning of Jerome Avenue does not repeat the mistakes of the past. The Mayoral administration has promised a new way forward, where development will be led by community needs instead of developers’ profits.⁴ Community groups and residents from across the South Bronx have come together to make that promise a reality.



¹“State of the City’s Housing and Neighborhoods,” NYU Furman Center, 2013

²“State of the City’s Housing and Neighborhoods,” NYU Furman Center, 2013

³Jerome Avenue Study Neighborhood Profile – Employment Profile,” Department of City Planning

⁴ “Text of Mayor de Blasio’s State of the City Address,” The New York Times, February 3, 2015.

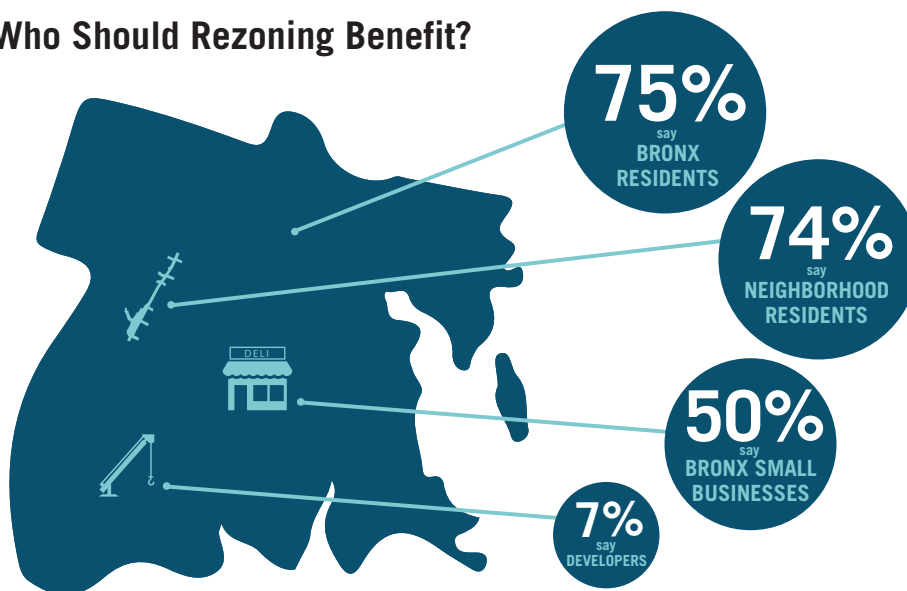
OUR COMMUNITY ENGAGEMENT PROCESS

From October 2014 to February 2015, the Department of City Planning convened a series of invite-only stakeholder meetings to discuss plans for the rezoning. Concerned about the lack of community involvement in the planning process, a group of community members began to meet and lay plans for genuine community engagement. Grounded in the belief that community members are the experts, we decided that our first act must be to hold a forum educating community members about the City’s plans, about the study area and about the need to get involved. On March 5th, in the middle of a snow storm, more than 450 community residents came to learn about the Jerome Avenue study area, the process of rezoning and how they could get involved. At the forum, we asked community members to sign up to take leadership roles and to help plan and facilitate a series of visioning sessions that would lead to the creation of a policy platform. The steering committee, made up of faith leaders, tenants, neighborhood union members, auto workers and members of tenant organizing groups adopted a series of principles to guide the visioning process.

PRINCIPLES GUIDING THE REZONING PROCESS

1. **STRONG ANTI-HARASSMENT & ANTI-DISPLACEMENT POLICIES FOR RESIDENTIAL AND COMMERCIAL TENANTS**
2. **REAL AFFORDABLE HOUSING**
3. **GOOD JOBS & LOCAL HIRE**
4. **REAL COMMUNITY PARTICIPATION**

Who Should Rezoning Benefit?



From community survey

We have not set out to develop a proposal for how the 73 blocks along Jerome Ave should best be used. Rather, our task was to develop a set of policy recommendations that would translate these principles into action.

If we cannot solve the dilemma of how to achieve change and progress without displacement, exploitation and harassment in the South Bronx, we risk losing one of the last neighborhoods where poor new Yorkers can afford to live. We risk losing the diversity and vibrancy of our City.

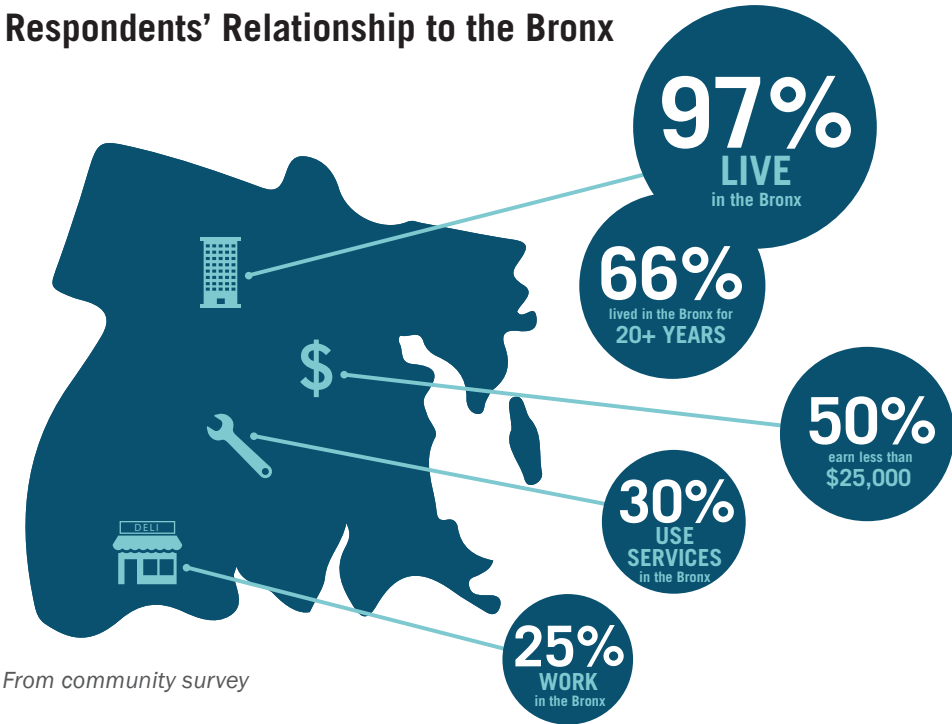
This report outlines a series of recommendations, ranging from administrative, to budgetary and legislative changes that we believe will turn our four principles into action and facilitate a process for change that will truly benefit the Bronx and all of New York City.

HOW OUR COMMUNITY DEVELOPED THIS PLATFORM

After the community forum convened on March 5th, the steering committee met and created a structure for community engagement. From March to June, we held four visioning sessions. At each session, we gave an overview of the community engagement process, of our coalition, and presented and shared data and information on the current status of jobs and employment, affordable housing, community involvement, commercial industries and tenant harassment. Grounded in this data and in our shared experiences, we worked in groups at each visioning session to brainstorm a list of solutions. Each session was attended by **100-150** community residents.

We also collected over **500** surveys about people’s concerns and hopes for the rezoning. This data is used throughout the platform to document the needs identified by community members. And we conducted extensive community outreach to ensure as many residents and workers as possible knew about this process.

Respondents’ Relationship to the Bronx



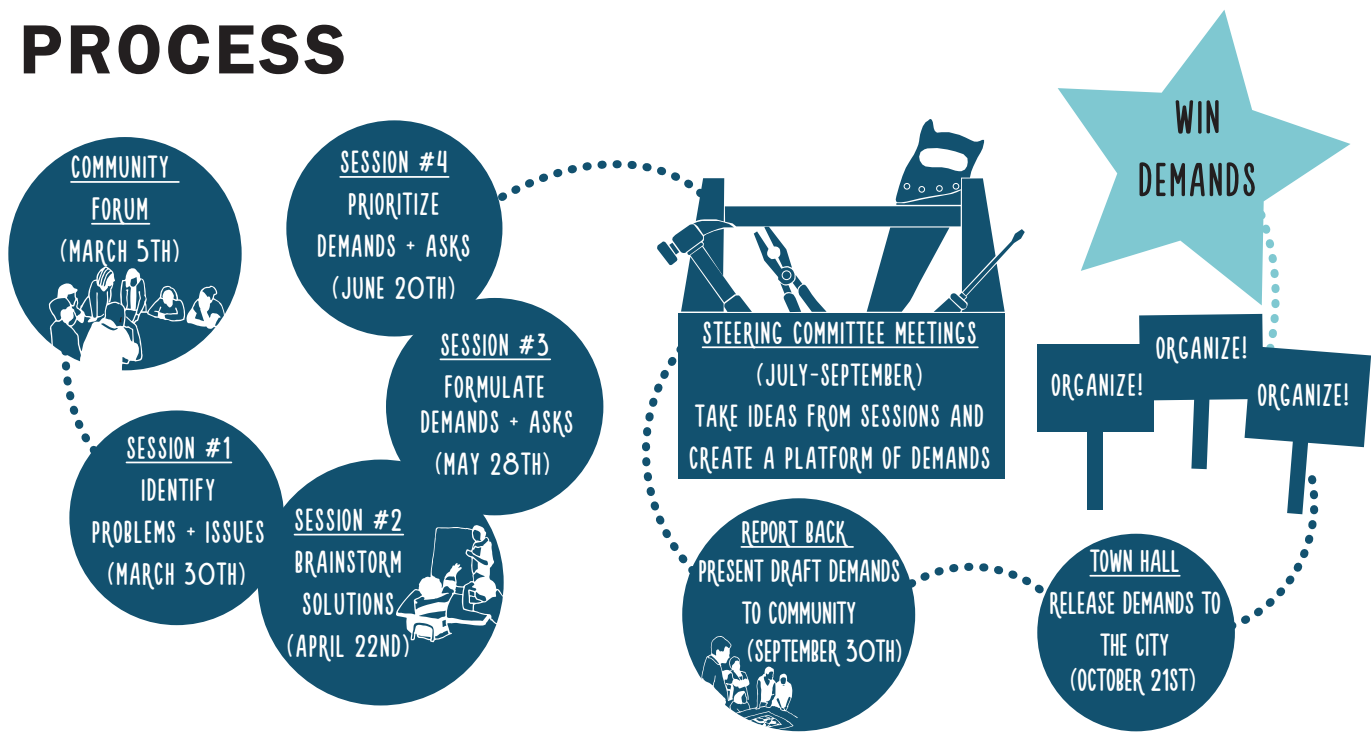
From community survey

On September 30th, we held a forum where we presented a draft of these policy recommendations to over **150** community residents to gain their insight, feedback and priorities.

In total, more than 1,500 community members attended the forums and visioning sessions.

More than **6,500** doors were knocked to tell tenants about the rezoning process and to let them know about the visioning session. More than **322** business owners had conversations with members of the coalition about the rezoning, while all businesses got information and flyers and more than **2,000** community residents were called.

PROCESS



POLICY PLATFORM

Through the visioning and community engagement process, community residents identified problems and issues, brainstormed the possible solutions and created the following series of recommendations for each of the 4 principles: Strong anti-harassment and anti-displacement policies for residential and commercial tenants; real affordable housing; good jobs and local hire and real community participation.

POLICY MECHANISMS

There are different policy mechanisms that the City could use to implement our recommendations. In the following platform, each recommendation will have an icon to indicate the specific mechanism that the City could use to achieve that recommendation. The legend explains the mechanisms that will be referred to as icons throughout the platform.



Citywide Legislation refers to laws passed in New York City. Any NYC Council member can introduce a bill, which proposes a new law or a change to an existing one. A bill is then brought to a vote and will become a local law if a majority of Council members support it and the Mayor signs off.



Requirements Attached to City Funding: When a City agency provides funding for a project, the agency can require the recipients of the funds to follow certain rules, or conditions. For example, certain City-funded development projects have to hire locally or pay a living wage.



Zoning Text sets requirements for every piece of land in the city. Land is divided into different types, or “zones.” Each type of area (each “zone”) has a specific set of rules that say how the land can be used – for example, for commercial, manufacturing, or residential building – and how much can be built.



Community Benefits Agreements (CBA): CBAs are legally enforceable private contracts between a developer and local community organizations. In exchange for community support of the project, the developer agrees to provide certain benefits such as local hiring, dedicated community space in a new facility, or anything else the community wants and is able to negotiate for.



City Budget: The budget guides how the City spends money on many kinds of services, programs, operations, activities, and physical infrastructure, ranging from education to policing to the building of parks or bridges. Putting a “line item” in the City budget means that the City agrees to set aside money for that expense.



PILOT (“Payment in Lieu of Taxes”) Fund: Within a certain area, the City can give developers exemptions from property taxes if the developer agrees to make PILOT payments instead (which are lower than taxes). PILOT payments can be put into a specific fund so that the money generated by development within a neighborhood is set aside for local use, rather than having tax dollars go to the City’s general fund.



Requirements in Requests for Proposal (RFPs) for City-Funded Projects: RFPs are the public invitations City agencies put out when they are selling or leasing City controlled land to a developer. An RFP can include specific requirements developers should meet. The City selects a winning proposal and the requirements that were in the RFP become part of the contract between the City and the winning bidder.



Changes to the Rules and Regulations of City Agencies: The City has many administrative agencies that are responsible for providing services and carrying out specific responsibilities. An “administrative” or “regulatory” change is where a City agency changes its own rules (or “regulations”) in some way, which impacts the practices of the agency and the population that it serves.



REAL AFFORDABLE HOUSING FOR ALL

WHY IS THIS IMPORTANT TO THE COMMUNITY?

While the City plans to build more affordable housing in our neighborhood through the rezoning process, we need to be sure that this new housing will actually meet the needs of current residents. Because of soaring rent increases across the City and lack of protection against these rising costs, many people who live and work in our neighborhood can no longer afford to live here. Community members fear that this will be an even bigger problem because of the rezoning.

49% also cite homelessness as a pressing neighborhood issue and 50% report that limited housing for seniors is a major issue. In addition, many community members are unable to access permanently affordable housing due to barriers such as credit history and criminal background checks. To address this, the city should adopt the following policy proposals to ensure that new affordable housing is truly affordable and meets the needs of the existing community.

87% of survey respondents said that at least 50% of new housing built should be set aside for families earning under \$27,000/year.

Housing Affordability

86%

say **HIGH RENT** is one of the most important issues in the Bronx



88%

had a **RENT INCREASE** in the past 3 years



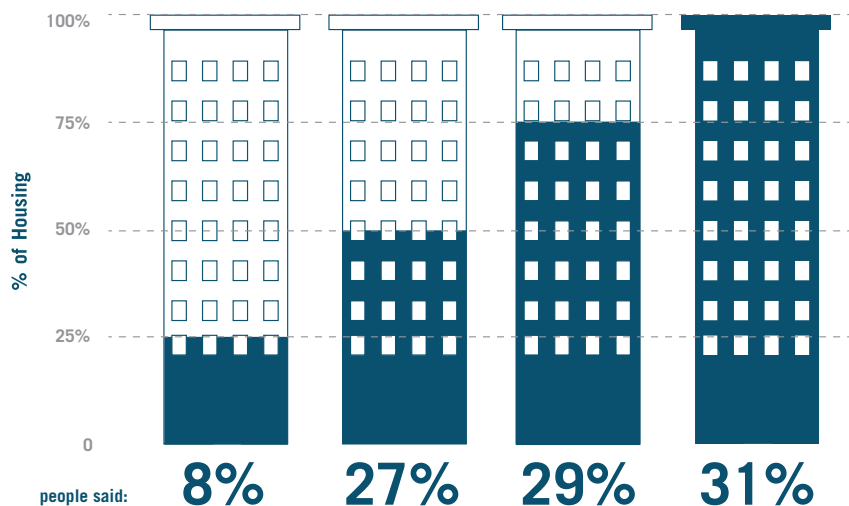
90%

worry rezoning will **INCREASE RENT** even more



From community survey

How Much Housing Should Be Set Aside for Households Earning Under \$27,000/Year?



From community survey

94% of survey respondents said that at least 50% of all new housing should be set aside for local residents.



How Much Housing Should Be Set Aside for Local Residents?



From community survey

POLICY PLATFORM

The City should ensure that new housing reflects the needs of current neighborhood residents.



To do this the City should:

- Ensure that 100% of new construction reflects the needs of current neighborhood residents.
- Create a special purpose district so that the zoning is tailored to the specific needs of our communities and require any developer who wants to add residential buildings on Jerome Avenue to build apartments that meet the needs of current residents.
- Provide subsidies and a programmatic commitment to build housing at affordability levels and apartment sizes that reflect the need of the existing residents of the neighborhood. New housing should also prioritize people with disabilities, single parents, veterans, youth, and people who are currently homeless.
- Convert “cluster-site” shelter units back to permanent housing to help significantly reduce the number of homeless families and provide City and State rent subsidies to allow families in “cluster-site” units that meet Section 8 quality standards to secure leases for the same apartments in which they already live.

The City should reduce barriers to tenant eligibility for affordable housing.



To do this the City should:

- Pass legislation limiting the criteria that HPD uses to determine which tenants qualify to be able to move into affordable housing. For example, people should not be turned away from affordable housing because of credit checks.

The City should create new requirements for developers seeking public subsidies.



To do this the City should:

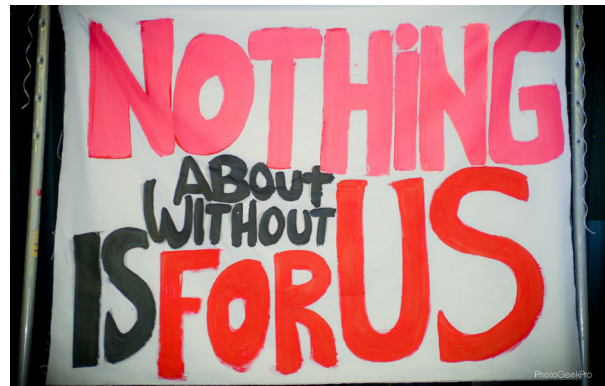
- Establish criteria for which landlords/developers are allowed to use public subsidies (HPD-administered subsidies), based on their:
 - Track record of maintaining buildings;
 - Track record of building affordable housing;
 - Track record of local community engagement;
 - Track record of working with contractors with a proven record of safety for 5 years, who don't have a record of wage theft or job misclassification, including all subcontractors, going back 5 years.

The City should ensure that community benefits are linked to new construction.



To do this the City should:

- Require developers to provide community benefits, like green roofs and beautifying the community.
- Require developers who want to build additional housing to set aside space for schools, community space, senior centers, open space, and other necessary community facilities to ensure that the neighborhood has enough of what it needs when new residents come in.
- Provide subsidies and programmatic commitment to support the development of new community facilities and neighborhood amenities and have developers sign enforceable agreements to provide additional amenities such as open spaces and schools.



Community visioning session



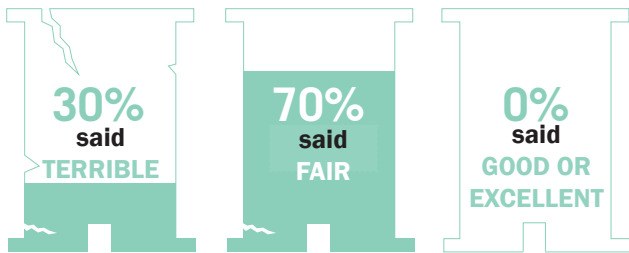
ANTI-DISPLACEMENT & ANTI-HARASSMENT POLICIES FOR RESIDENTIAL TENANTS

WHY IS THIS IMPORTANT TO THE COMMUNITY?

As the City plans to create new affordable housing through the rezoning of Jerome Avenue, they must ensure that current residents are not being harassed by their landlords or displaced from their homes. This is particularly important because our community has one of the highest rates of rent stabilized apartments in the city, and displacement leads to increased rents and loss of affordable housing.

In addition, tenant harassment is directly related to the availability of affordable housing. For rent stabilized tenants, every time they move out of their apartment, landlords are legally allowed to increase rents by at least 20%. This means not only do tenants lose a rent stabilized apartment but that over time the apartment itself is made less affordable and eventually deregulated.

How People Rated Their Housing Conditions

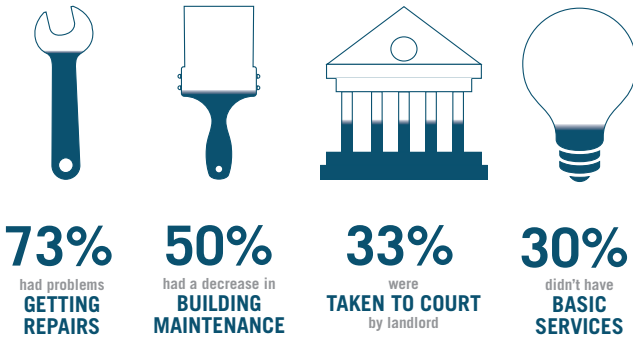


From community survey

Harassment can take many forms: lack of services (heat, hot water, etc.); threats from landlords, frivolous legal action, non-rent fees, pressuring tenants to take buyouts, taking advantage of loopholes in the rent stabilization laws, and pitting tenants against one another. Even before the rezoning, Bronx tenants are already experiencing many of these conditions. 68% of tenants surveyed reported that their current housing conditions are terrible or fair; 57% report that they have problems getting repairs done, 27% have

been taken to court by their landlord; 27% have lived without basic services and 33% have seen a decrease in maintenance services in their building. People surveyed fear that this harassment will become worse with the rezoning: 80% report being concerned that rent will no longer be affordable after the rezoning and 59% report concerns about being displaced from the neighborhood. Because tenants often are not aware of their rights, they are particularly vulnerable to harassment.

Housing Problems in Past 3 Years



From community survey

While we are encouraged by the City's recent funding for eviction prevention services, we know that most of the work to keep tenants in their homes comes before court papers are served.

Accordingly, the City and State must adopt the following policy proposals to create a comprehensive, neighborhood-specific approach to prevent harassment and displacement of current residents.

POLICY PLATFORM

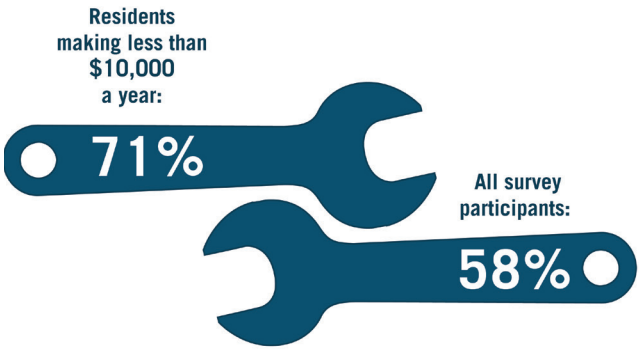
The City should enact a set of policies that create incentives that prevent speculation and displacement and promote affordable housing development.



To do this the City should:

- Require “landlord licenses,” creating strict rules for which landlords or developers are allowed to operate in NYC.
 - HPD or another city agency would determine whether a landlord can get a license based on a set of qualifications (e.g.: number of violations in other buildings they own, unpaid taxes and fees owed to the city, other buildings in foreclosure). The license would enable landlords to acquire property. If a landlord is not in compliance, the landlord would not be eligible to receive another license and therefore unable to purchase more buildings.
- Publicly grade landlords and publicly display that grade in their building lobby.
- Pass and fund Intro 214, providing a right to a lawyer for tenants facing the loss of their homes.
- Amend the Alternative Enforcement Program (AEP) to allow tenants to get a rent reduction and use a City-run escrow account when their building is in bad repair.
 - This is modeled on a program in LA, called the Rent Escrow Account Program. When there are violations that haven’t been fixed, the city would be able to reduce tenants’ rent and allow them to pay their rent into an escrow account, monitored by the city. The Landlord would not get the money until the City verifies that repairs have been done.
- Create citywide “Certificate of No Harassment” requirements, preventing landlords who have harassed tenants from getting certain permits from the Department of Buildings
 - In order to raise rents for new tenants, landlords often do renovations on apartments and buildings. This law would prevent landlords who have a history of harassment from getting the permits they need to do those renovations. This model has been locally effective in the Clinton special district, and should be expanded by requiring that DOB and HPD put a similar policy in place across the city. In addition, the policy should apply to a larger set of DOB permits.
- Pass legislation to allow for the City to take ownership of buildings as a result of landlord harassment, failure to pay code violations and the criminal use of property. The City should also use its authority to take ownership of individual abandoned buildings, even where there are no tax arrears.
- Create a disincentive for landlords to buy buildings with the intent of selling them quickly (speculative flipping) by applying a graduated flip fee, structured like the mortgage recording fee. The City should also help facilitate stable long-term New York City homeownership by increasing the New York City Real Estate Transfer Taxes on all transfers to non-owner occupied (investor purchased) 1-4 family homes.
- Fully assess a development or redevelopment project’s potential displacement impact and require associated mitigation plans and fees. The City can model this off of the California Environmental Quality Act, which currently requires an assessment of displacement related impacts for development projects above a certain threshold.
- Track public investment at the neighborhood level and use this information to improve equity in budgeting decisions. This can be modeled off of Portland’s budget mapping initiative.
- Strengthen the obligations of marshals in avoiding eviction of “at-risk tenants.” Right now there are provisions for elderly, sick, and disabled tenants. These provisions should be extended to include families with children under 3 and families with 2 or more children.
- Pass Intro 3-2014, which allows the City to sue landlords for relocation expenses. If a building is vacated by DOB, the landlord should be required to pay relocation costs.
- Implement a “No Net Loss” policy at the City level.
 - Conduct a baseline assessment of affordable housing units within the city, broken down by neighborhood and affordability level (by income bracket). This inventory should include information on number of units, rent level of units, household size and income of inhabitants. A moratorium on demolition, conversion, etc. should be in place until this assessment is complete and a plan to address the city’s need is in place.
 - Based on the inventory, neighborhoods should set goals for preservation within each bracket by neighborhood and for the city as a whole.
- Create a good neighbor tax credit to stabilize the hidden supply of affordable housing in our small homes neighborhoods. Offer a real estate tax abatement to owners of owner-occupied small homes who rent an apartment at below-market rates because of longstanding community ties.

Extremely low income residents had MORE DIFFICULTY GETTING REPAIRS DONE.



From community survey

The City should increase oversight of landlords and be more proactive in identifying and targeting bad acting landlords.



To do this the City should:

- Monitor housing court cases, particularly in high risk displacement areas and refer to community organizations and/or legal aid/legal services who will do additional outreach to help determine if the case is part of a larger harassment pattern.
- HPD should create a “zero tolerance” policy for harassment and poor building conditions (meaning the city will take legal action against the owner). This includes but is not limited to :
 - HPD should send a letter to all landlords informing them of the zero tolerance policy.
 - HPD should ensure that oversight is in place so that owners of rent stabilized apartments properly register the rent, do not charge more than the legal amount, do not harass tenants or encourage tenant turnover as a way to increase rents, and properly maintain the building.
 - HPD should aggressively follow up once a determination is made that a building is physically distressed and/or tenants are being harassed – this includes aggressive and effectively targeted litigation against bad owners as well as effective use of the emergency repair program.
 - HPD should not negotiate with landlords to reduce fines in HP or 7A cases, unless there is an equivalent monetary benefit to tenants.

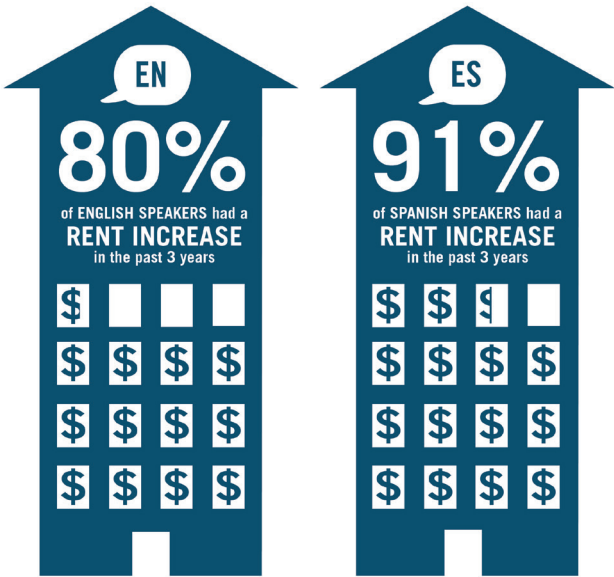
The City should support outreach and ‘know your rights’ education by community groups to local residents.



To do this the City should:

- Fund community groups to develop and carry out an outreach and information campaign, teaching tenants how to organize and form tenants associations. The funds should focus on neighborhoods currently at highest risk of harassment and displacement.
- Develop materials so tenants know their rights and understand what is available to them in terms of assistance and recourse. These materials include but are not limited to:
 - Information about 311 and the process to call regarding harassment and building conditions;
 - A “what is harassment” fact sheet ;
 - Explanation of what rent histories are and how tenants can get them;
 - Information on rent regulation and tenant rights;

Housing Affordability and Language



From community survey



The City should improve communication with tenants about their rights.



To do this the City (HPD and DOB) should:

- Notify residents when inspectors will be out to inspect their buildings.
- Notify residents when HPD or DOB is taking legal action against a landlord.

The City should improve the various building inspection systems.



To do this the City should:

- Require building inspectors to respond to calls within 24 hours.
- Ensure that 311 calls, particularly if multiple calls are documented, lead to a comprehensive inspection of the property by an inspector (not just isolated visit regarding the individual complaint).
- The City should create protocol and systems for tenants to evaluate individual inspectors.
- Implement stronger emergency repair protocol to prevent serious violations from lingering. For instance, if an inspector finds that a “C” violation still exists when they return to reinspect, HPD should automatically send a repair team to fix the condition and should bill the repairs to the building owner.

*Note: State level demands for this section are not included in this document but are available.



The City should make key neighborhood data easily available for public review.



To do this the City should:

- Make the following data publicly available and easily accessible:
 - Create a comprehensive list of evictions. Eviction rates should be tracked by building and by owner.
 - Track housing related 311 calls and identify patterns by building, neighborhood, and owner;
 - Develop a referral process from 311 calls, similar to the Legal Aid/Legal Services hotline, where tenants reporting concerns are referred to community organizations in their neighborhood for follow up service.
 - Create a comprehensive list of distressed buildings by neighborhood, with all public information such as building ownership, management, and most recent sale date.

Developers should contribute resources to prevent displacement of current residents.



To do this the City should:

- Require developers to pay into an anti-displacement fund. This fund should fund community organizing initiatives in neighborhoods where the developers are building. The City could do this through the rezoning process by establishing a PILOT fund in the zoning text. The money collected should fund community organizing initiatives in neighborhoods where developers are building. The funding would be dedicated to anti-displacement initiatives, and could also be used for affordable housing construction and other community needs.



ANTI-DISPLACEMENT & ANTI-HARASSMENT POLICIES FOR COMMERCIAL TENANTS

WHY IS THIS IMPORTANT TO THE COMMUNITY?

As the City changes the rules about how land in the Jerome Corridor can be used, community members want to ensure that current businesses and workers in the neighborhood are protected and strengthened, with the opportunity to continue to serve the area in the future. Community members want to ensure that new business activity will serve the needs of current residents, and provide pathways for quality jobs for workers who face barriers to employment.

The neighborhood is home to a vibrant auto repair industry as well as other small businesses, especially local groceries and restaurants. Residents and business owners fear that the zoning changes will lead to displacement of these existing businesses and subsequently to a lack of affordable goods and services: 45% of survey respondents fear they will no longer be able to shop in the neighborhood after the rezoning. These fears are well founded: nearly all the auto repair shops in the corridor lease their locations and are dependent on their co-location alongside other auto businesses in the corridor for their success. More than 90% of merchants interviewed indicated that they purchase essential equipment, materials and other products nearby. Survey respondents also issued a strong call for local ownership, with 87% wanting local Bronx residents to own the businesses in the neighborhood. The following policy proposals will allow the City to create a comprehensive, neighborhood-specific commercial anti-displacement strategy for Jerome Avenue.

POLICY PLATFORM

The City should provide relocation support for those businesses that are displaced through the rezoning.



To do this the City should:

- Provide financial and technical assistance, including business loans, for local, small businesses in the rezoning area to help cover the cost and needs of relocation. This would apply to local retail and restaurants and auto related businesses
- Collaboratively with the auto merchants in the area, identify criteria for collective relocation (such as size, distance from original location, building type, and distance from transit).
- Identify a suitable location based on mutually agreed upon criteria and sufficiently fund investments in the site and costs of business relocation.
- Relocate businesses to nearby areas where housing is not being considered and manufacturing businesses have more protections, such as Industrial Business Zones in the Bronx (for example, Bathgate, Zerega, and Hunts Point).
- Communicate with businesses in collective forums and groupings, recognizing cooperative structures.



The City should select an area in the proposed rezoning area where auto-related businesses— including auto parts, security and audio stores—can remain and be protected.



To do this the City should:

- In consultation with the community, develop the reasoning and criteria for selecting the size and location for this protected area.
- In consultation with the community, identify the best mechanism for protecting and strengthening this area, considering a Special District designation, and taller heights for commercial buildings.
- Clearly define the total amount of commercial space that should take place in this area.
- Prohibit specific uses that would otherwise be permitted by the current zoning uses but that would compete with the intended goals of the area (such as hotels).

The City should give preference for return to local businesses.



To do this the City should:

- Create a system to offer existing, interested businesses in the proposed rezoning area a “right of first return” or preference in occupying new space(s) created by development.
 - Identify existing interested business tenants and document their needs to shape the design and implementation of that system as part of any zoning action.
 - Returning businesses should be guaranteed rents comparable to what they previously paid.

The City should pass legislation making it illegal to harass small businesses and other non-residential tenants



The City should provide training for workers and owners of local businesses.



To do this the City should:

- Increase funding for outreach and training programs that help auto businesses in the area obtain the necessary licenses and meet environmental standards.
- Offer trainings in the dominant language of the workers and/or support the development English language skills.
- Provide training in the development of worker cooperatives, which are a legal way for undocumented immigrants to earn a living.
- Partner with NYS Department of Environmental Conservation to do a project similar to the one in Hunts Point to accomplish the goal of environmental compliance and improved environmental performance.
- The City should pass legislation making it illegal to harass small businesses and other non-residential tenants

The City should ensure that local, small businesses can be physically located and thrive in the area once it is rezoned.



To do this the City should:

- Adopt Special Enhanced Zoning Districts that limit commercial uses to the types commonly used by local residents, such as grocery stores.
- In new zoning, limit the size of new commercial spaces in order to create opportunities for local small businesses and not just large, corporate chain stores.
- Pass legislation to limit increases in rents to no more than 5% in the rezoning area through all legal mechanisms, including requirements on developments that receive public subsidy, and city legislation.
- Advocate with NYS to pass legislation that requires all property owners to give mandatory lease renewals for expiring leases.

The City should develop a citywide policy approach that adopts best practices to support the auto sector as a whole.



To do this the City should:

- Conduct a study of the auto sector corridors throughout the five boroughs that assesses the real needs of workers and owners and the unique challenges that they face. The study should be advised by a Steering Committee that includes auto business owners and workers, and conducted by an entity that can fairly value the contributions of the sector to the city as a whole, including the necessary service it provides, the entrepreneurship and employment pathways it creates, and economic contribution.
- Develop a coherent policy that addresses the sector’s current needs, plans for and equips workers and businesses for industry changes, and makes recommendations for citywide land-use policies that address those realities.

Who Should Own Businesses in the Bronx?



What Kind of Businesses Do You Want To See in the Bronx?



From community survey





GOOD JOBS & LOCAL HIRE

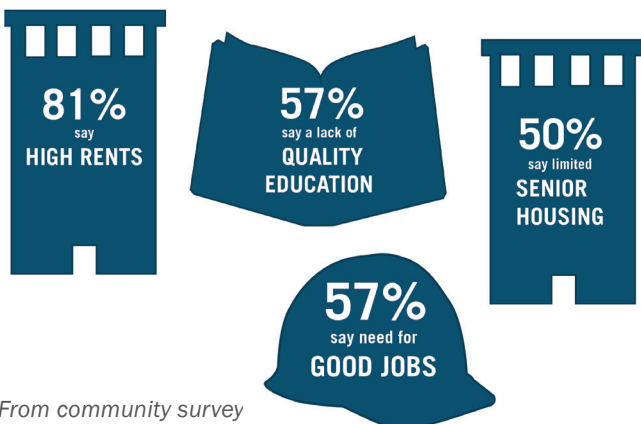
WHY IS THIS IMPORTANT TO THE COMMUNITY?

As the City changes land regulations via the rezoning process, and additional development and construction is expected, community members want to ensure that local residents benefit most from the new economic opportunities created through the rezoning. In fact, 57% of survey respondents cited the need for good jobs as one of the most important issues facing the Bronx.

Community members report that they want such jobs to include healthy working environments, living wages, education and training for workers, job security and employee protection. Community members also want union jobs that turn into careers and the assurance that they can access these career pathways through the necessary training programs. Many community members also find it difficult to find jobs due to multiple barriers including language access, history of incarceration, education, immigration status, lack of childcare, lack of employment history and lack of job opportunities in the community.

The following policy proposals will ensure that New York City and State governments prioritize access to good, local, union jobs with career pathways and provide education and training for Bronx residents to overcome barriers to employment and ensure that they can benefit most from the rezoning of their neighborhood.

Most Important Issues Facing the Bronx



From community survey

POLICY PLATFORM

The City should ensure local hiring.



To do this the City should:

- Insert local hiring requirements into the zoning:
 - The City should put a hard requirement for local hiring in the zoning text. Either all construction projects, or projects above a certain size, should be required to hire locally. Like the City’s proposed Mandatory Inclusionary Housing policy, the requirement model would make local hiring part of the cost of doing business in our neighborhood.
- Adopt a citywide “first-source” policy:
 - A new first-source citywide policy should require developers who receive City money to hire people from the local community in which they are building. This kind of policy should include overall local hiring goals, goals for certain target populations (such as youth or people of color), and/or apprenticeship goals. The City already has laws that require certain City-funded projects to pay a living wage, and a “first source” policy would build on that policy by adding a local hiring requirement. The requirements wouldn’t necessarily apply to any project receiving City money, but would affect projects above a certain size or dollar amount in public funds. “First source” policies exist in many other places and should be created in New York.
- City agencies (such as HPD) and the Economic Development Corporation (EDC) should make local hiring a requirement of projects they fund.
 - When City agencies or the EDC start large projects, they put out Requests for Proposal (RFPs) for developers who want to build the projects. These RFPs should include specific local hiring requirements and state that developers who are prepared to meet those requirements will be given preference in the selection process.
- The City should also adopt local hiring requirements for the rezoned area. The City currently has local hiring requirements for projects backed by the City

in Sandy-impacted neighborhoods; they should do the same for the neighborhoods they are rezoning.

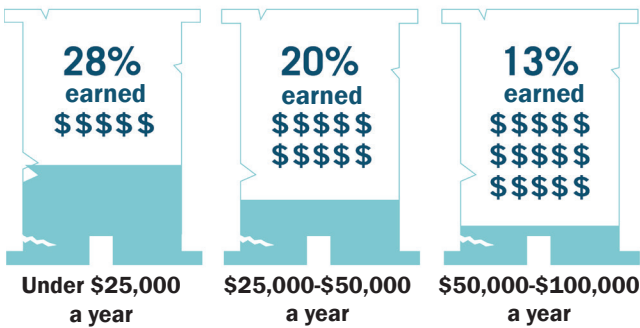
The City should guarantee good wages for jobs created by the rezoning.



To do this the City should:

- Expand the Fair Wages for New Yorkers Act so it covers more workers. The living wage law requires employers that receive at least \$1M of financial assistance from the City or the Economic Development Corporation (EDC) to pay a living wage to their employees at the project site, unless the employer qualifies for an exception. In the fall of 2014, Mayor de Blasio extended the city’s living wage requirements to include not only the owners of buildings receiving \$1M or more in support, but also commercial tenants at such project sites. But, these requirements don’t apply to businesses with gross income below \$3M or to manufacturers.
- Create Community Benefits Agreements (CBAs) requiring prevailing wages. The City should pass legislation requiring developers who receive a certain amount of subsidy or public land to engage in CBA negotiations with local community groups, and should condition receipt of the subsidy or land on successful negotiation of a CBA.
- Provide real transparency on prevailing rate jobs. When prevailing wage jobs are available, signs should be posted throughout the neighborhood, and especially in front of the job site. The notices should explain what prevailing wage is, and should be in the top 6 languages spoken in the community.

Of the people who reported “TERRIBLE LIVING CONDITIONS”:



From community survey

The City should provide job training & education to local residents.



To do this the City should:

- Fund GED programs in neighborhoods where apprenticeship programs are being implemented.
- Allocate additional funding dedicated to local apprenticeship programs and implement them before construction projects begin so that there is a pool of skilled local workers available. The city must also conduct outreach so people know about training programs.
- Provide scholarships, childcare and other support to residents so they can access apprenticeship programs.
- HRA and SBS should have job training programs and transitional job programs that train residents for jobs in the sectors where new jobs are being created.

The City should assist with job placement for local residents in need of employment.



To do this the City should:

- Create and fund a Local Employment Network to connect local residents to job opportunities created by the anticipated development in the area to be rezoned.
 - The City should provide funding to local community-based organizations to develop a network and hire a local coordinator to engage with developers in the neighborhood, provide trainings for local residents, screen candidates for positions in upcoming projects, and make referrals. This would be similar to the Lower East Side Employment Network, which emerged as a result of a development boom on the LES.
 - The City should list Jerome Ave Local Employment Network as the preferred hiring source for City-funded projects.
- Allocate funding to enable community-based organizations to provide sector-specific workforce training. The City should fund local Bronx organizations to provide training for industries with a strong presence in the Bronx. Focus trainings on fields that offer high-quality, highly skilled jobs.



REAL COMMUNITY ENGAGEMENT

WHY IS THIS IMPORTANT TO THE COMMUNITY?

As the City plans to make major changes to the neighborhoods along Jerome Avenue through the rezoning process, community residents are concerned that they will not be able to have input into decisions about the future of their neighborhoods. In fact, 44% of survey respondents reported being concerned that they won't be able to "give real input into the rezoning plans." Community members also want to ensure that changes to our community benefit current community residents, with 60% of respondents saying that the rezoning should benefit neighborhood residents most. **With 1,500 community members turning out to participate** in the town hall meetings and visioning sessions, it is clear that community members have a strong desire to be a part of deciding what happens in their neighborhood.

To ensure real community engagement, the City must make sure that residents are informed about and included in the process of neighborhood planning. In addition, we need enforcement tools and ongoing oversight to ensure that the promises made to the community during the rezoning process are kept in the future. The following proposals will enable the City to plan smartly, promote real community engagement in the rezoning process, and give residents, workers, and local business owners authentic decision-making power and oversight over policies that will affect our neighborhoods.



Community visioning session

POLICY PLATFORM

The City should improve structures and systems and increase resources for real community participation in neighborhood planning.



To do this the City should:

- Create a taskforce open to all community members that can help encourage better local participation.
 - People in the community have the best understanding of who needs to be involved and how to engage others. The City should draw on this local knowledge by creating a taskforce to develop more ideas to support more and better participation. City Planning and other agencies should then follow those ideas to get more people involved.
- Give residents a seat at the decision-making table and a chance to vote.
- Once the scope of study is released, the City should create an affordable housing taskforce open to all local residents who want to work with officials to figure out how much affordable housing there should be, and at what rent levels. Those principles should then guide the City's plans.
- Provide resources to support CBOs in developing a community vision. This will allow CBOs to hire planners and other experts who are directly accountable to the community.
- Allow time for a real community plan to be created and for the following to happen before the ULURP process starts:
 - Create a local design statement to guide development (at least 9 months). The City should formally adopt this statement so that community members can continue to hold elected officials accountable to that statement as development proceeds.
 - Provide a chance for community members to consider and vote on a range of ideas about possible plans for the neighborhood. Multiple options should be presented, not just a single plan.



Community visioning session

- Residents and other community members should help prioritize which issues are most important. This will ensure that local residents, workers, and business owners drive the focus of the planning.
- Residents should have a chance to review draft goals and plans throughout the process to make sure that they reflect the community's goals.
- There should be a range of activities and ways to provide feedback on proposed plans, including discussion forums, drop-in days with local experts who can explain the process and proposed ideas, models displaying suggested changes, visual presentations, small workshops, and written surveys with physical and electronic drop boxes.
- Ensure meetings are accessible to as many people as possible.
 - There should be dozens of meetings open to the public, not just a few. For example, the first Cooper Square Alternative Plan was developed after over 100 community meetings.
 - All sections of the community that will be affected should be involved in the planning process.
 - Special meetings should be held to address the concerns of specific groups, like young people, public housing residents, or local businesses.
 - All meetings and flyers should be in the top six languages spoken in the community.
 - Notices should be distributed where people live and meetings should be advertised widely in local media sources.
 - Food and childcare should be provided at all public meetings.
 - When the City plans meetings, it should work with local CBOs to help get the word out so more people know about meetings.

The City should evaluate the existing need of the neighborhoods affected by the rezoning.



The City should do this by:

- The Department of City Planning (DCP) and related agencies should analyze each of the neighborhoods that will be affected by the rezoning, not just study the “rezoning corridor” (Jerome Ave). This will help residents better understand the impact of the rezoning on their community.
- For each impacted neighborhood, City Planning should create a profile that:
 - Shows the existing needs and capacity for housing, school seats, park space, transportation, sewage infrastructure, and other facilities and services.
 - Includes clear proposals of how and when the neighborhood's existing needs will be addressed.
 - Is in a format that is accessible to community members (unlike dense and highly technical documents, like the Environmental Impact Statement), and is translated into the top 6 languages spoken in the neighborhood.
- Evaluate local needs - including needs for the preservation and development of affordable housing and high-quality jobs - as the basis of its plans.
- The City should work with residents to identify the community's assets, challenges, and future possibilities, so that development is guided by what the community wants. The City should not just think of this area as a means of achieving broad citywide goals; the community's own goals are just as important.

- The City should make its information about housing and job needs public, so that residents can evaluate whether proposed plans are likely to meet those needs or not.

The City should evaluate future impact of proposed changes on each neighborhood.



- For each neighborhood that will be affected by the rezoning, DCP and related agencies should create a profile that analyzes and addresses increased demand for community facilities and services that the rezoning will create. Each neighborhood profile should:
 - Explain the impact of a proposed zoning change on housing, schools, parks, transportation, and other facilities and services in the area.
 - Include clear proposals of how and when the future needs will be addressed, with details specific to each neighborhood.
 - Be in a format accessible to community members, not a dense and highly technical document, and translated into the top 6 languages spoken in the neighborhood.

More Spanish-Speaking than English-Speaking residents LIVE WITHOUT BASIC SERVICES (gas, heat, hot water, etc.)

Spanish-Speaking Residents:



English-Speaking Residents:



From community survey

The City should take steps to ensure that the community actually gets what it's promised.



To do this the City should:

- Create protections in the zoning to ensure that the community gets the facilities and services it needs before a lot of new housing is built.
- The City should put a rule in the zoning that requires developers to show that there is enough school capacity, park space, transportation, and other necessary facilities to support the people who will come in with the new development. The rule should say that the Department of Buildings will issue permits for more residential development only if there is enough local capacity. If there is not, DOB should issue permits only if the developer agrees to provide space in the development for the new facility that is needed (for example, a new school). This will help ensure that the community actually gets the improvements it is promised and that any residential development is timed appropriately with new community services.
- Create a formal opportunity for community oversight of the plan going forward. Local people can help make sure that the plans for the area are followed and continue to reflect the community's vision.

CALL TO ACTION

The Mayor's Housing Plan will drastically change our city. The question is how, for whom, and by whom?

While the housing plan focuses on preserving and building 200,000 units of affordable housing, we must remember that more market rate housing will be built through this plan than affordable housing. In fact, for every unit of affordable housing that the City will finance developers to build, at least 2 market rate units will be built.⁵ To do this, the City is changing policy about how land is used and facilitating the accrual of record profits for developers. Many questions remain unanswered for Jerome Avenue since the City has not yet released its plan of how many units of housing should be built, what percentage of those units should be affordable or how it defines affordability.

Both the 421A tax reforms and the proposed Mandatory Inclusionary Housing program that the administration has pushed forward fail to meet the needs of residents in the Southwest Bronx, as they provide a small percentage of affordable housing, if any at all. Rather than creating genuinely affordable housing, they create market pressures that will accelerate the displacement of poor people of color.

To date, the Mayor has not yet released a comprehensive plan to preserve the City's existing affordable housing, and has not developed the new tools necessary to address this growing crisis. While we support increased funding for eviction prevention services and the creation of a Tenant Support Unit, they do not provide a comprehensive or systematic approach to preservation.

Already, the prospect of the rezoning is impacting the neighborhood. Increased land prices provide a financial incentive for owners of rent stabilized property to push out rent stabilized tenants and accelerate the destabilization that is already happening. And owners of the buildings that house small business are doubling rents, refusing to issue leases and shortening the length of the leases from 10 years to 1 year. Displacement is here. It will only get worse if we don't intervene.

We are in a unique moment to set an example for the Bronx and for the City. We deserve to build neighborhoods for the people that live here by the people that live here so that we can live with dignity and respect. This includes preserving and creating jobs for local residents that allow pathways for advancement.

Whatever the City decides for the future of Jerome Avenue, it cannot and should not move forward without adopting our policy recommendations, to ensure that progress and gentrification are not synonymous.

We call on the City to take this seriously, to respect this policy platform as the result of thousands of voices of Bronx residents, and to implement our recommendations.

We call on Bronx residents to get organized.

See back of report for information on how to get involved.

⁵ "Text of Mayor de Blasio's State of the City Address," The New York Times, February 3, 2015.

BRONX COALITION FOR A COMMUNITY VISION

ABOUT

The Bronx Coalition for A Community Vision formed after learning about the City's plans to rezone 73 blocks along Jerome Avenue, from 167th Street to 184th Street.

WHO WE ARE

Community Action for Safe Apartments - New Settlement Apartments, Latino Pastoral Action Center, Northwest Bronx Community and Clergy Coalition, VOCAL-NY, United Auto Merchants Association, Faith In New York, Local 79, Plumbers Local No. 1, NYC District Council of Carpenters, 100 Black Construction Workers, Real Affordability for All.

GET INVOLVED!

Call or email Susanna at CASA at
(718)716-8000 or s.blankley@newsettlement.org

WITH SUPPORT FROM



WWW.BRONXCOMMUNITYVISION.ORG



**Testimony of Bryant Brown
SEIU 32BJ
Jerome Avenue Scoping Hearing
September 29, 2016**

Good evening,

My name is Bryant Brown, and I am here today testifying on behalf of SEIU 32BJ. 32BJ is the largest private sector property service union in the United States. We represent 70,000 building service workers in New York City, including workers in buildings that will be impacted by this rezoning.

The Jerome Avenue Rezoning Draft Scope of Work predicts that the Special Jerome Avenue District will facilitate the creation of 3,250 residential units in Community Districts 4 and 5. These new buildings will also bring new building service jobs, which include the cleaners, porters and superintendents who maintain and secure residential buildings throughout the city. It is therefore essential that any investigation of the socioeconomic impact of this rezoning consider how the rezoning will affect jobs in this industry.

32BJ members maintain, clean, and provide security services in residential buildings all across the five boroughs. Where we represent workers, they are earning wages and benefits that allow them and their families to live, work, and succeed in this city.

The buildings that the rezoning will facilitate can create good jobs for workers in the Southwest Bronx, and support an industry that has historically created middle-class jobs for many New Yorkers. This is especially important to consider in Community Districts 4 and 5, where the local median household income is approximately \$25,900 according to the Draft Scope of Work. For these reasons, I encourage the Environmental Impact Study to include an examination of the potentially adverse effects that the rezoning might have on the local building service industry.

Thank you.

From: [Jerome Avenue Study \(DCP\)](#)
To: [Annabelle Meunier \(DCP\)](#); [Evren Ulker-Kacar \(DCP\)](#)
Subject: FW: The Residents Who Are Being Vacated Along The Jerome Avenue
Date: Monday, November 07, 2016 9:49:37 AM

I may have already passed this one along?

-----Original Message-----

From: F Canada [<mailto:fcamma44@hotmail.com>]
Sent: Thursday, November 03, 2016 8:52 PM
To: Jerome Avenue Study (DCP) <JeromeAvenue@planning.nyc.gov>
Subject: The Residents Who Are Being Vacated Along The Jerome Avenue

The residents need much help, an indepth education about what will really happen to them - their home, business and much more. There is a shortage of apartment for families earning under \$40,000. So, that alone is a reason to mandate that the housing that will be constructed - needs and should accommdate 50%, at least, of the residents who are being pushed out.

Health facilities, school, recreational center are just some of what's needed; make this also a mandate - that this will be a COMMUNITY and not just a neighborhood.

Offer assistance to the businesses who are loosing their financial resources and maybe, don't know what to do to get started again effectively.

The Bronx and this Jerom Avenue Project do not need to contribute directly to THE HOMELESS POPULATION.

I hope all the ideas will be given serious consideration and they will be put into action for a BETTER BRONX and for the citizen all over the Bronx.

Flo Canada

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New York City Department of City Planning
Environmental Assessment and Review Division
120 Broadway, 31st Floor
New York, NY 10271-3100
Attn: Robert Dobruskin, Director
By Email to at RDOBRUS@planning.nyc.gov
October 7, 2016

Members

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Beverly Reid, Esq.
JoAnn Sacks, Ph.D.
Stefan Selig
Andrew Zimmern

Re: Jerome Avenue Scoping - 1600 Macombs Road, Bronx
(Block 2865, Lot 134)

Dear Mr. Dobruskin:

Services for the UnderServed Inc. (SUS) is a non-profit social service agency and supportive housing provider in New York City with over 100 properties serving over 5,000 households annually including persons experiencing homelessness, veterans, individuals with developmental disabilities, mental illnesses, and substance abuse disorders. SUS is the owner of a state licensed residential drug treatment center at 1600 Macombs Rd., 1 block west of the Jerome rezoning corridor.

I am writing this letter to respectfully urge the Department of City Planning to include this parcel Avenue (Block 2865, Lot 134) in the rezoning review. We believe that the redevelopment of this site will serve the goals set forth by New York City as well as address the concerns and hopes expressed by residents and elected officials at the September 27th Scoping Meeting.

The site is currently home to a 200 bed residential drug treatment clinic and a small community medical clinic. The facility is housed in a former hospital built in the early 1900s. Despite renovations and additions over the years, the program is ill-served by the dated facility and the community is underserved given the property's potential for development.

SUS is in the early stages of a redevelopment project to construct a mixed use facility with low and moderate income residential units, permanent housing for formerly homeless individuals supportive units, an enlarged medical clinic and space for a YMCA type community center open to the public. In addition, some substantial portion of the residential treatment program will be retained in a modernized and improved setting.

Affiliate Members

Michelle Ballan, Ph.D.
Amelia Wright Brewer
Scott Dreyfus
Adam Kneller
Bryan Rodriguez

Advisory Council

George C. Bidale
Robert B. Catell
Alice Korngold
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**Chief Executive
Officer**

Donna Colonna

**Jerome Avenue Scoping letter
October 7, 2016**

The site is currently zoned R7-1, which could potentially produce 220 units of housing plus some combination of the above uses. We believe that R8 is the appropriate designation for this site. The site is surrounded by wide streets, and there are many residential buildings in the neighboring blocks of 8 stories and above. R8 would significantly increase the permitted floor area, thereby allowing a significant increase in the amount of affordable and supportive housing we can provide. It would also allow more flexibility in laying out the project given the unique nature of the site. R8 zoning will make the project more economically viable and more attractive to potential partners and funders. We anticipate that, when complete, the redevelopment of this site will become a community focal point providing a hub for active living, medical care and social engagement.

I would be happy to speak with you or your staff regarding the specifics of the project. I can be reached at achase@sus.org or 917 408 1695. Thank you for your consideration.

Regards,



Arlo M. Chase
Senior Vice-President for Real Estate and Property Development
Services for the UnderServed Inc.

TESTIMONY AT
BRONX DEPARTMENT OF CITY PLANNING'S
PUBLIC HEARING ON
JEROME AVENUE NEIGHBORHOOD PLANNING STUDY ENVIRONMENTAL SCOPING MEETING
29TH SEPTEMBER, 2016
BRONX COMMUNITY COLLEGE
GOULD MEMORIAL LIBRARY AUDITORIUM, 2155 UNIVERSITY AVENUE, BRONX

GOOD EVENING.

MY NAME IS FITZROY CHRISTIAN. I HAVE BEEN LIVING HERE IN THE SOUTHWEST BRONX SINCE 1975, AND HAVE CONTRIBUTED ALL I COULD TO HELP PRESERVE MY COMMUNITY, IN MY ADOPTED HOME, FOR MY OWN SELF AND FOR MY FAMILY HERE IN NEW YORK. I AM ALSO A TENANT LEADER AT CASA, AND A MEMBER OF THE BRONX COALITION FOR A COMMUNITY VISION.

I WAS HERE DURING THE UGLY DAYS WHEN THE CITY OF NEW YORK AS WELL AS MAIN STREET NEW YORK DISINVESTED IN THE BOROUGH, WHEN, AS THE POPULAR PHRASE GOES, THE BRONX WAS BURNING. I WAS HERE WHEN FIRE HOUSES WERE CLOSED; WHEN SCHOOLS AND AFTER SCHOOL PROGRAMS WERE DEFUNDED; WHEN PARKS AND OUR OTHER GREEN SPACES WERE NEGLECTED AND LEFT TO DETERIORATE ALONG WITH OTHER PARTS OF THE INFRASTRUCTURE. I WAS HERE AND STAYED HERE WHEN OTHERS WERE LEAVING. I WAS NOT ALONE. TENS OF THOUSANDS OF OTHERS WERE HERE, TOO. BUILDING FAMILIES AND COMMUNITIES. CREATING BUSINESSES TO SERVE THE COMMUNITIES WE WERE MAINTAINING. WORKING TWO AND SOMETIMES MORE JOBS TO TAKE CARE OF OUR FAMILIES. DEDICATING OUR LIVES TO MAKING SURE OUR CHILDREN GET OPPORTUNITIES WE DID NOT HAVE, BECOMING COLLEGE AND UNIVERSITY GRADUATES, BECOMING DOCTORS AND NURSES AND LAWYERS AND ENGINEERS AND BIO-CHEMISTS AND JUDGES AND PHYSICISTS AND ACCOUNTANTS AND OTHER CAREER PROFESSIONALS IN ALL AREAS OF LIFE.

AND HERE, THIS EVENING, IN THIS SPACE, I AM BEFORE YOU TO DECLINE ACCEPTING THE REWARD YOU HAVE OFFERED ME AND THE REST OF US FOR OUR DECADES OF STRUGGLE TO

MAINTAIN AND GROW OUR COMMUNITIES DESPITE ALL ODDS. AND "WHAT IS THAT REWARD?" YOU MAY ASK.

MY DISPLACEMENT. OUR DISPLACEMENT.

FOR THAT IS WHAT YOU ARE PROPOSING IN YOUR SCOPE OF WORK JUST RECENTLY RELEASED. YOU ARE SAYING IN THE clearest possible terms that you need the space we are occupying, that the tens thousands of us have called our home, for others. So we got to go.

YOU CAME INTO OUR COMMUNITIES WITH YOUR VISION OF WHAT YOU WANT OUR NEIGHBOURHOODS TO BE, AND ASKED US TO TWEAK IT FOR YOU. YOU CAME IN OUR COMMUNITIES TO ASK US, THE VICTIMS OF YOUR GENTRIFICATION MACHINATIONS, TO PARTICIPATE IN OUR OWN EXPULSION FROM OUR HOMES OF 20, 30, 40, OR MORE YEARS.

YOU DELIBERATELY DISMISSED OUR COMMUNITIES' ABILITY TO BE FULL PARTNERS IN THE PROPOSED UPZONING AND REDEVELOPMENT OF OUR NEIGHBOURHOODS. AND EVEN WHEN YOU WERE PRESENTED WITH A COMMUNITY DRIVEN VISION, SHOWING HOW THE REDEVELOPMENT CAN HAPPEN WITHOUT THE PAINFUL AND UNNECESSARY DISPLACEMENTS, DISLOCATION OF FAMILIES, DESTRUCTION OF COMMUNITIES, YOU CONTEMPTUOUSLY DISREGARDED IT. AND US.

SO WE ARE BEING OFFERED NO LOCAL HIRES OR CAREER-ORIENTED JOBS FOR MEMBERS OF OUR COMMUNITIES, WHERE UNEMPLOYMENT IS HIGHEST IN THE CITY OF NEW YORK.

SO WE ARE BEING OFFERED NO HOUSING AFFORDABLE TO US AT OUR NEIGHBOURHOODS' MEDIAN INCOME, BUT HOUSING FOR PEOPLE WHO MAKE TWICE OR THREE TIMES OUR MEDIAN INCOME.

SO WE ARE BEING OFFERED SOME FUNDING FOR LEGAL REPRESENTATION FOR RESIDENTIAL TENANTS WHO ARE BEING AND WILL CONTINUE TO BE PUSHED OUT OF OUR HOMES TO MAKE PLACE FOR WEALTHIER FOLKS, WITHOUT THE REQUIRED MECHANISMS TO *PREVENT* THE HARASSMENTS DISPLACEMENTS IN THE FIRST PLACE.

Dear Robert Dobruskin, Director

11-7-16

Environmental Assessment and Review Division,

New York City Department of City Planning, 120 Broadway, 31st Floor,

New York, New York 10271

Dear Robert Dobruskin:

My name is Enrique Colon a life long resident of the Bronx and particularly the area being rezoned. I have lived in the section of the Bronx called Morris Heights for over 43 years which is just a few blocks west of Jerome Avenue at 174th Street. I have also been a member and I'm currently employed at CASA/New Settlement Apartments working to protect and maintain affordable housing in the community that I love and grew up in. I am very concerned about the affects the potential rezoning of Jerome Avenue will have on the current residents and businesses of this community. There must be a plan created that makes sure that real affordable housing is built for the current residents, that there are strong anti-displacement and harrasment policies in place ahead of any rezoning, union jobs and local hire and real community participation throughout the entire process and into the future.

If this rezoning is to be approved the majority of the housing must be built for the income levels that current residents make which is \$25,000 for Community Board 4 and \$21,000 for Community Board 5. We need to have strong anti-displacement and harrasment policies in place immediately. The speculation alone after the Jerome Avenue Neighborhood Study was announced has caused some auto-related business to leave and attempt to relocate somewhere else. Other small businesses have also seen their rents double and have been forced to move (ie: Todo Barado Discount Store at 1 East 170th Street) They were doing business at that location for over 18 years and had no intentions on leaving. How is this benifiting the exixting businesses and the community. Many auto-related businesses are also seeing their rents double or triple, leases being renewed for a year instead of 10 years or mutiple years as in the past.

That the majority auto industry blocks pedestrians use of the sidewalks is incorrect. In the many years that I've walked the area I have seen very few instances of that. Even if that were the case that doesn't and shouldn't mean that the city scape-goats an entire industry to build so called affordable housing. If the city has it's way under Mandatory Inclusionary Housing a large percentage of the housing built would be for people making between \$51,000 to \$69,000. The assumption that rezoning doesn't displace people and businesses is incorrect. All you need to do is look at what has happended after the 125th Street rezoning, Greenpoint-Williamsburg Brooklyn rezoning, and Willets Point rezoning for example. The examples can go on and on. The city can not buit it's majority unaffordable "affordable housing" at the expense of the current community's future existence. If it does every institution including the face of the elected offiiciaals will eventually change. A community with much higher income will vote for people that look like them and that they feel will represent their income status.

The community wasn't asked if they wanted to be studied or rezoned in the first place. The the outreach that the Department City Planning did was dismal and at key times wasn't done at all. For example I did

not see any flyers for the workshop held at Davidson Community Center regarding how the September 29th Draft Scope Public Hearing would look like. I secondly didn't see any flyers regarding the very important and first Public Hearing on the Draft Scope of Work held on September 29th at Bronx Community College.

As you saw and heard the majority of the community doesn't want this rezoning at all, wants the policy platform of the Bronx Coalition for a Community Vision adhered to if not the community for all sectors is willing to do whatever it takes to make sure that it is totally rejected. For detailed recommendations regarding the Bronx Coalition for a Community Vision please go to bronxcommunityvision.org and review the coalition's submitted testimony.

What would you do if someone was trying to take away the home you grew up in and that your parents still live in. I assume that you would do everything possible to stop it from happening. So why would anyone think that we wouldn't do the same thing!

Respectfully,

Enrique Colon

Life-long Bronx resident

80 Featherbed Lane

Bronx, NY 10452

From: Colon, Henry
To: [Evren Ulker-Kacar \(DCP\)](#)
Cc: [Ahmed, Shakil](#); [Evan Lemonides \(DCP\)](#); [Dantzler, Betty](#)
Subject: FW: Jerome Avenue Rezoning DSOW 17DCP019X
Date: Wednesday, September 14, 2016 11:00:52 AM

Hi Evren:

Below are our comments on the Jerome Avenue Rezoning DSOW.

These will be posted to CEQRView.

We have distributed the document internally and will notify you if there are additional comments.

I hope to review the 550 Washington Avenue responses and back -up tomorrow and will call Evan in the morning.

Thank you, Henry

Comments on Jerome Avenue Rezoning Scope of Work

Other

1. Pages 2 and 5, state that the proposed action seeks to provide opportunities for high quality affordable housing with options for a wide range of income levels, it appears that the RWCDs, where a substantial portion of residential units will be affordable and no accessory parking would be required for affordable units, will have 40 more accessory parking spaces than the No Action, which has no guarantees for affordability. Please provide the distribution (number/percent) of 993 accessory parking allocated to non-affordable residential units, local retail, office, FRESH supermarket and restaurant.
2. Dwelling Unit Factor (DUF) – We ask that DCP reassess the applicability of the 1,000 sq. ft. DUF (Page 25) considering the cost/square foot of land has steadily increased in the last decade in all boroughs and is reflected in increased rent or purchase price. The Economic Development Corporation may be using an 800 sq. ft. DUF for an upper Manhattan project and probably reflects that more residents are occupying less area per dwelling unit than other cities. While there is a trend for micro-units apartments that are less than 400 sq. ft., the average size in NYC seems to be 550 sq. ft. for studios, 750 sq. ft. for one-bedroom and 950 sq. ft. for two-bedroom apartments. Does DCP anticipate a higher percentage of three-bedroom apartments in RWCDs?

Transportation

1. Travel Demand and Screening Assessment (page 45) - Please have the consultant state the *CEQR Technical Manual* as part of the standard sources. The comment also applies to the fifth bullet on page 47. In addition, in the last sentence of the opening paragraph please change “...trip assignment (a Level-2 screening assessment) *has been* (instead of will be) to validate the intersections and pedestrian/transit elements selected for analysis.”
2. Traffic (page 45) - Please have the consultant modify the last sentence in the first paragraph to “...additional vehicle trips per hour *or at known congested locations.*” Also, on page 47 (third bullet) after parking regulations include “*and vehicle queue lengths.*” In addition, in fourth bullet please modify the third line to “...lane group, *per intersection approach* and per overall intersection”
3. Pedestrians (page 49) – Similar to the intersection analysis list on page 46, please have the consultant include those pedestrian elements that exceed the CEQR thresholds.
4. Vehicular and Pedestrian Safety (page 50) – Please have the consultant include a write-up on Vision Zero effort (<http://www.nyc.gov/html/dot/downloads/pdf/ped-safety-action-plan-bronx.pdf>) and identify those Vision Zero Priority Corridors (Appendix A) or Intersections

(Appendix B) within the study area. Also, in the first sentence please change “traffic accidents” to “traffic crashes”.

5. Parking (page 50) – Please have the consultant include the following sentence “If the initial on- and off-street parking assessment shows conditions at or near capacity, then a parking assessment will be conducted up to a ½-mile radius to determine if capacity is available to accommodate the projected demand.”

-



Office of the President
Language Hall, Room 27
P: 718.289.5151
F: 718.289.6011

Bronx Community College
of The City University of New York
2155 University Avenue
Bronx, New York 10453

July 26, 2016

Dr. Bola Omotosho
Chairperson, Community Board No. 5
625 Tinton Avenue, #2
Bronx, NY 10455

BOLA Re: Letter of Support for Project H.I.R.E. Grant Application

Dear Dr. ~~Omotosho~~:

I am writing to you to express Bronx Community College's (BCC) support for the Project H.I.R.E. Grant application of Community Board No. 5.

BCC is committed to collaborating with Community Board No. 5 to provide job seekers with the job readiness skills to reenter and retrain for employment in today's workforce. Through the College's Office of Community and Workforce Development we will partner to assist the grant management with services in academic and vocational support, job readiness training, vocational training, job placement, and follow-up.

If you need any further information or documentation support for this application please do not hesitate to contact me.

Sincerely,

Thomas A. Isekenegbe
Thomas A. Isekenegbe, Ph.D.
President

C: David W. Levers, Director of Government Relations and External Affairs

