

**APPENDIX F:
Written Comments
on the
Draft Environmental Impact Statement**



THE ASSEMBLY
STATE OF NEW YORK
ALBANY

STACEY PHEFFER AMATO
Assemblywoman 23rd District
Queens County

CHAIR
Subcommittee Child Product Safety

COMMITTEES
Consumer Affairs & Protection
Corporations, Authorities & Commissions
Governmental Employees
Racing & Wagering
Veterans' Affairs

MEMBER
Legislative Women's Caucus

August 26, 2019

Olga Abinader, Acting Director
Environmental Assessment and Review Division
New York City Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271

Dear Acting Director Abinader:

Thank you for the opportunity to submit testimony. I am writing today in response to the Draft Environmental Impact Statement issued by the New York City Department of City Planning regarding the proposed redevelopment of the former Peninsula Hospital site. As a lifelong resident and representative of the Rockaway Peninsula, I believe this re-development project- as currently stated- is not suitable to our community's capacity and resources.

While the proposed redevelopment has the ambitious and worthy goal of improving the quality of life along with providing affordable housing for our community, there are still numerous serious concerns that must be addressed immediately: Over density of housing, transportation congestion, grossly inadequate parking, and insufficient educational resources. The Rockaway Peninsula is being redeveloped from east to west and we must consider the effects of this project on the entire community.

Hurricane Sandy ravished over 85% of our community in 2012. New York City and State have been focused on the recovery and resiliency of the Rockaway Peninsula. The population density proposed is excessive without taking into consideration the unique characteristics of this neighborhood. The Peninsula Hospital site falls within Flood Zone AE, a high-risk flood area, which would create an unnecessary risk for such as high-density housing development. Moreover, as stated in the Resilient Edgemere study, which was prepared by the New York City Housing Preservation Department, only low-density housing, stores, and parkland was recommended to be built in that area.

At this point, any planning or development on the Rockaway Peninsula must be a complete comprehensive plan including the essential resources needed in order for our community to thrive decades into the future. I respectfully request that you keep these necessary and important points in mind while issuing the final environmental impact statement.

Thank you for your immediate attention to this matter. Should you have any questions, please do not hesitate to contact my office at 718-945-9550

Sincerely,

Stacey Pheffer Amato
Member of New York State Assembly
23rd District, Queens

Queens Borough President Recommendation

APPLICATION: ULURP #190251 MMQ

COMMUNITY BOARD: Q14

DOCKET DESCRIPTION

IN THE MATTER OF an application submitted by Akerman LLP on behalf of the Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 199 of the NYC Charter for an amendment of the City Map involving:

- the establishment of a portion of Beach 52nd Street between Rockaway Beach Boulevard and Shorefront Parkway;
- the adjustment of grades and block dimensions necessitated thereby:

including authorization for any acquisition or disposition of real property related thereto, in Community District 14, Borough of Queens, in accordance with Map No. 5033 dated April 17, 2019 and signed by the Borough President.

(Related: ULURPs #190325 ZMQ, N190364 ZRQ, 190366 ZSQ, 190375 ZSQ)

PUBLIC HEARING

A Public Hearing was held in the Borough President's Conference Room at 120-55 Queens Boulevard on Thursday, July 11, 2019 at 10:30 A.M. pursuant to Section 82(5) of the New York City Charter and was duly advertised in the manner specified in Section 197-c (i) of the New York City Charter. The applicant made a presentation. There were ten (10) speakers in favor with five (5) speakers against. The hearing was closed.

CONSIDERATION

Subsequent to a review of the application and consideration of testimony received at the public hearing, the following issues and impacts have been identified:

- The applicant is proposing to re-establish and re-open a portion of Beach 52nd Street between Rockaway Beach Boulevard and the Rockaway Freeway. The reopening of this portion of Beach 52nd Street would improve traffic circulation in the area. This application was filed as part of the proposed redevelopment of the former Peninsula Hospital site as a Large Scale General Development (LSGD);
- The applicant has also concurrently filed other applications to facilitate development of the proposed LSGD. The other applications are for a rezoning to C4-4 and C4-3A, zoning text amendments to Appendix F of the NYC Zoning Resolution establishing and designating the area to be rezoned as a Mandatory Inclusionary Housing Area and to allow a Physical Culture Establishment within the LSGD, a Special Permit allowing modification of yard, height and setback requirements, and a Special Permit to modify signage regulations for potential commercial uses in the LSGD;
- The proposed LSGD would total 2,371,000 gross square feet built in 11 buildings with heights varying between 8- to 19-stories over six sub-sections of the 410,052.28 sf site. There would be a total of 2,200 residential units. There would be 1,927 units for incomes up to 80% AMI including 201 units of Affordable Independent Residences for Seniors (AIRS) and 273 units of moderate income housing. A 20,000 sf supermarket would be built in Phase I of the project as part of the 72,000 sf of retail space proposed in the project. 77,000 sf of community space is proposed that would allow schools, day care or medical care facilities, or cultural space. Parking would be provided in 973 accessory parking spaces located in parking lots and garages distributed throughout the development area with 754 residential spaces, 144 retail spaces and 75 spaces for community facility/ medical office uses. A proposed privately owned, open internal roadway network with two 60 feet wide streets (north-south extension of Beach 52nd Street, and an east-west Peninsula Way between Beach 50th & Beach 53rd Streets) that would create four quadrants on the site. 24,000 sf of publicly accessible open space would be distributed throughout the site. Two major components would be an open space identified as Pedestrian Plaza (Beach 51st Street) and Highpoint Intersection (intersection of Beach 52nd Street & Peninsula Way). Both would be resilient gathering points for pedestrians with planters and seating. The Beach 51st Street open space would have a children's play area, rubber play surfaces, and a pedestrian plaza with publicly accessible amenities. The phased build out is projected to be 10 to 15 years;
- The project site is the former site of Peninsula Hospital. Since the closure of the hospital there has been no activity on the property. The immediate area surrounding the project site is predominantly developed with residential buildings. Generally to the east most of the development is in low-rise houses. The NYCHA Ocean Bay Apartments (7- and 9-story buildings) are located directly north and west of the project site. Further to the west there are a few taller residential buildings. But, the majority of buildings are also low-rise residential buildings. The elevated subway track is located to the south with the beach and waterfront directly beyond it. There are semi-industrial storage uses located along Rockaway Beach Boulevard but, not many retail or commercial uses in the area;

QUEENS BOROUGH PRESIDENT RECOMMENDATION

ULURP #190251 MMQ

Page two

- Community Board 14 (CB 14) disapproved the application with conditions by a vote of twenty-eight (28) against with five (5) in favor and one (1) abstaining at a public hearing held on June 25, 2019. CB 14's conditions were as follows: reduction of total number of units by 30% to 50%; residential parking should be increased up to 75% of units; there is an existing need for school seats – a new K-8 school should be built immediately for existing area students and future students; a prevailing wage agreement for all workers should be in place; in consultation with CB 14 a holistic transportation plan for the entire peninsula should be done to mitigate existing issues and impacts from the project; the final AMI mix should be discussed with CB 14 to determine the need and what is appropriate. Senior affordable housing has strong CB 14 support; there should be 5 month progress reports by Arker to CB 14. There should be a website that provides project updates and project related job opportunities; development should be capped at 12-stories; HPD property at B48th to B 51st Streets should be deeded to Department of Parks. Arker should fund planning, construction, and maintenance of a community park with a park house, multipurpose field and running track, children's playground with water features; there should be a signed Community Benefits Agreement including jobs for local residents; minimum 50% of units should be set aside for CB 14 residents;
- The applicant at the Borough President's public hearing explained that project is intended to create new housing opportunities at varying income levels for the neighborhood, bring new economic activity into the area that would provide employment, goods and services for everyone in Rockaway. Several of those testifying in favor of the project spoke about the need for housing, jobs, goods and services that the project would make available for everyone and in particular for returning recent college graduates. Many of the people who testified against the project said there was need for increased economic activity and jobs for the neighborhood. However, there were also concerns about the number of housing units proposed, the proposed height of the buildings, and how the area is now impacted by the overburdened infrastructure and limited roadways that would be exacerbated by the increased numbers of people and vehicles drawn to the area by the proposed project and especially during a major storm emergency. The imbalance between overutilized and underutilized schools in the project area was also mentioned by some of the speakers.

RECOMMENDATION

There is a broad agreement that the former Peninsula Hospital site should be redeveloped to bring new housing and economic development into the area that needs jobs, goods and services. The differences and objections voiced by CB 14 and others in the community are about the size, density and scale of the proposed project compared to the built character of the area as it currently exists and potential negative impacts. This project should be the beginning of the revitalization of this area. But, it must be implemented with sensitivity to the existing area residents and in a manner to assure success of the project and improvements for the community.

Based on the above consideration, I hereby recommend approval of the project with the following conditions:

- There is a need for housing in the area. However, the need for housing in the area should not be met all on one site. CB 14 wanted a 30% to 50% reduction of units. The number of units should be reduced from the proposed 2200 units to 1600 units of housing. That reduction would bring the project closer to the density of the nearby Ocean Bay Apartments;
- Provision of more moderate- and medium-income units for seniors, working families and individuals who wish to stay in the community. CB 14 has requested further consultation on the AMI mix of the project. Mixed income neighborhoods are important to sustain local businesses that bring jobs, goods and services to the neighborhood;
- As proposed the project's tallest buildings would be more than double the height of other buildings in the immediate area. CB 14 has requested a 12-story cap on building heights. The heights of the tallest buildings should be lowered to be more in character with the heights of area buildings;
- CB 14 had requested provision of 75% parking for proposed units. The applicant should stay in contact with CB 14 and community groups and within a year of approval there should be a reassessment to determine the adequacy of the proposed parking and whether there are any opportunities to find more spaces to meet any unanticipated need. In any case, even with a reduction of units the proposed 973 parking spaces must be maintained;
- The developer should meet with CB 14 every five months for project updates and an opportunity to discuss the project as it moves forward;
- Continued efforts to bring Article 28 emergency medical facilities into the area. There was testimony at the public hearing that timeliness of treatment is a critical element to survive cardiac emergencies and that there were no emergency cardiac treatment centers on the Rockaway Peninsula. Cardiac and other Article 28 critical emergency treatment facilities must be made available on the Rockaway Peninsula;
- Good schools are very important to building communities. Pre-K seats should be provided onsite. CB 14 has requested a new K to 8 school to serve the project and surrounding area. The Department of Education (DOE) must dedicate the resources necessary to improve the local schools immediately to serve the students living in the district in the vicinity of the project. Going forward DOE must account for the forecasted number of students and have funding and plans in place to have seats ready in a new school to accommodate new students.



PRESIDENT, BOROUGH OF QUEENS



DATE

Queens Borough President Recommendation

APPLICATION: ULURP #190352 ZMQ

COMMUNITY BOARD: Q14

DOCKET DESCRIPTION

IN THE MATTER OF an application submitted by Akerman LLP on behalf of the Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 20-1 of the NYC Charter for the amendment of the Zoning Map Section No. 30c:

1. eliminating from within an existing R5 District a C1-2 District bounded by a line 420 feet southerly of Beach Channel Drive, Beach 50th Street, Rockaway Beach Boulevard, and the easterly street line of former Beach 51st Street;
2. changing from an R5 District to a C4-4 District property bounded by Beach Channel Drive, the westerly street line of former Beach 51st Street, a line 420 feet southerly of Beach Channel Drive, Beach 50th Street, Rockaway Beach boulevard, and Beach 53rd Street; and
3. changing from an C8-1 District to a C4-3A District property bounded by Rockaway Beach Boulevard, a line 100 feet easterly of Beach 52nd Street, a line 85 feet northerly of Shore Front Parkway, and Beach 52nd Street;

Borough of Queens, Community District 14, as shown on a diagram (for illustrative purposes only) dated May 6, 2019, and subject to the conditions of CEQR Declaration E-532.

(Related ULURPs # 190251 MMQ, N190364 ZRQ, 190366 ZSQ, 190375 ZSQ)

PUBLIC HEARING

A Public Hearing was held in the Borough President's Conference Room at 120-55 Queens Boulevard on Thursday, July 11, 2019 at 10:30 A.M. pursuant to Section 82(5) of the New York City Charter and was duly advertised in the manner specified in Section 197-c (i) of the New York City Charter. The applicant made a presentation. There were ten (10) speakers in favor with five (5) speakers against. The hearing was closed.

CONSIDERATION

Subsequent to a review of the application and consideration of testimony received at the public hearing, the following issues and impacts have been identified:

- o The applicant is proposing to rezone the project site between Beach Channel Drive and Rockaway Beach Boulevard generally between Beach 53rd Street to Beach 51st Street and 50th Street from R5 with a C1-2 overlay to a C4-4 district, and a site south across Rockaway Beach Boulevard and Beach 52nd Street from C8-1 to a C4-3A district. The proposed rezoning would facilitate development of a Large Scale General Development (LSGD);
- o The applicant has also concurrently filed other applications to facilitate development of the proposed LSGD. The other applications are a mapping action to reopen a portion of Beach 52nd Street, a zoning text amendment to Appendix F of the NYC Zoning Resolution establishing and designating the area to be rezoned as a Mandatory Inclusionary Housing Area, a Special Permit allowing modification of yard, height and setback requirements and to allow a Physical Culture Establishment within the LSGD, and a Special Permit to modify signage regulations for potential commercial uses in the LSGD;
- o The proposed LSGD would total 2,371,000 gross square feet built in 11 buildings with heights varying between 8- to 19-stories over six sub-sections of the 410,052.28 sf site. There would be a total of 2,200 residential units. There would be 1,927 units for incomes up to 80% AMI including 201 units of Affordable Independent Residences for Seniors (AIRS) and 273 units of moderate income housing. A 20,000 sf supermarket would be built in Phase I of the project as part of the 72,000 sf of retail space proposed in the project. 77,000 sf of community space is proposed that would allow schools, day care or medical care facilities, or cultural space. Parking would be provided in 973 accessory parking spaces located in parking lots and garages distributed throughout the development area with 754 residential spaces, 144 retail spaces and 75 spaces for community facility/ medical office uses. A proposed privately owned, open internal roadway network with two 60 feet wide streets (north-south extension of Beach 52nd Street, and an east-west Peninsula Way between Beach 50th & Beach 53rd Streets) that would create four quadrants on the site. 24,000 sf of publicly accessible open space would be distributed throughout the site. Two major components would be an open space identified as Pedestrian Plaza (Beach 51st Street) and Highpoint Intersection (intersection of Beach 52nd Street & Peninsula Way). Both would be resilient gathering points for pedestrians with planters and seating. The Beach 51st Street open space would have a children's play area, rubber play surfaces, and a pedestrian plaza with publicly accessible amenities. The phased build out is projected to be 10 to 15 years;
- o The project site is the former site of Peninsula Hospital. Since the closure of the hospital there has been no activity on the property. The immediate area surrounding the project site is predominantly developed with residential buildings. Generally to the east most of the development is in low-rise houses. The NYCHA Ocean Bay Apartments (7- and 9-story buildings) are located directly north and west of the project site. Further to the west there are a few taller residential buildings. But, the majority of buildings are also low-rise residential buildings. The elevated subway track is located to the south with the beach and waterfront directly beyond it. There are semi-industrial storage uses located along Rockaway Beach Boulevard but, not many retail or commercial uses in the area;

QUEENS BOROUGH PRESIDENT RECOMMENDATION

ULURP #190352 ZMQ

Page two

- o Community Board 14 (CB 14) disapproved the application with conditions by a vote of twenty-eight (28) against with five (5) in favor and one (1) abstaining at a public hearing held on June 25, 2019. CB 14's conditions were as follows: reduction of total number of units by 30% to 50%; residential parking should be increased up to 75% of units; there is an existing need for school seats – a new K-8 school should be built immediately for existing area students and future students; a prevailing wage agreement for all workers should be in place; in consultation with CB 14 a holistic transportation plan for the entire peninsula should be done to mitigate existing issues and impacts from the project; the final AMI mix should be discussed with CB 14 to determine the need and what is appropriate. Senior affordable housing has strong CB 14 support; there should be 5 month progress reports by Arker to CB 14. There should be a website that provides project updates and project related job opportunities; development should be capped at 12-stories; HPD property at B 48th to B 51st Streets should be deeded to Department of Parks. Arker should fund planning, construction, and maintenance of a community park with a park house, multipurpose field and running track, children's playground with water features; there should be a signed Community Benefits Agreement including jobs for local residents; minimum 50% of units should be set aside for CB 14 residents;
- o The applicant at the Borough President's public hearing explained that project is intended to create new housing opportunities at varying income levels for the neighborhood, bring new economic activity into the area that would provide employment, goods and services for everyone in Rockaway. Several of those testifying in favor of the project spoke about the need for housing, jobs, goods and services that the project would make available for everyone and in particular for returning recent college graduates. Many of the people who testified against the project said there was need for increased economic activity and jobs for the neighborhood. However, there were also concerns about the number of housing units proposed, the proposed height of the buildings, and how the area is now impacted by the overburdened infrastructure and limited roadways that would be exacerbated by the increased numbers of people and vehicles drawn to the area by the proposed project and especially during a major storm emergency. The imbalance between overutilized and underutilized schools in the project area was also mentioned by some of the speakers.

RECOMMENDATION

There is a broad agreement that the former Peninsula Hospital site should be redeveloped to bring new housing and economic development into the area that needs jobs, goods and services. The differences and objections voiced by CB 14 and others in the community are about the size, density and scale of the proposed project compared to the built character of the area as it currently exists and potential negative impacts. This project should be the beginning of the revitalization of this area. But, it must be implemented with sensitivity to the existing area residents and in a manner to assure success of the project and improvements for the community.

Based on the above consideration, I hereby recommend approval of the project with the following conditions:

- There is a need for housing in the area. However, the need for housing in the area should not be met all on one site. CB 14 wanted a 30% to 50% reduction of units. The number of units should be reduced from the proposed 2200 units to 1600 units of housing. That reduction would bring the project closer to the density of the nearby Ocean Bay Apartments;
- Provision of more moderate- and medium-income units for seniors, working families and individuals who wish to stay in the community. CB 14 has requested further consultation on the AMI mix of the project. Mixed income neighborhoods are important to sustain local businesses that bring jobs, goods and services to the neighborhood;
- As proposed the project's tallest buildings would be more than double the height of other buildings in the immediate area. CB 14 has requested a 12-story cap on building heights. The heights of the tallest buildings should be lowered to be more in character with the heights of area buildings;
- CB 14 had requested provision of 75% parking for proposed units. The applicant should stay in contact with CB 14 and community groups and within a year of approval there should be a reassessment to determine the adequacy of the proposed parking and whether there are any opportunities to find more spaces to meet any unanticipated need. In any case, even with a reduction of units the proposed 973 parking spaces must be maintained;
- The developer should meet with CB 14 every five months for project updates and an opportunity to discuss the project as it moves forward;
- Continued efforts to bring Article 28 emergency medical facilities into the area. There was testimony at the public hearing that timeliness of treatment is a critical element to survive cardiac emergencies and that there were no emergency cardiac treatment centers on the Rockaway Peninsula. Cardiac and other Article 28 critical emergency treatment facilities must be made available on the Rockaway Peninsula;
- Good schools are very important to building communities. Pre-K seats should be provided onsite. CB 14 has requested a new K to 8 school to serve the project and surrounding area. The Department of Education (DOE) must dedicate the resources necessary to improve the local schools immediately to serve the students living in the district in the vicinity of the project. Going forward DOE must account for the forecasted number of students and have funding and plans in place to have seats ready in a new school to accommodate new students.



PRESIDENT, BOROUGH OF QUEENS

8/8/2019

DATE

Queens Borough President Recommendation

APPLICATION: ULURP #190364 ZRQ

COMMUNITY BOARD: Q14

DOCKET DESCRIPTION

IN THE MATTER OF an application submitted by Akerman LLP on behalf of the Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 201 of the New York City Charter for zoning text amendments:

- modifying Appendix F of the Zoning Resolution designating the Project Area as a Mandatory Inclusionary Housing ("MIH") area, Borough of Queens, Community District 14, as shown on a diagram (for illustrative purposes only) dated May 6, 2019, and subject to the conditions of CEQR Declaration E-532; and,
- modifying Zoning Resolution Section 74-744(a) to allow a Physical Culture Establishment (PCE) as-of-right within the Large Scale General Development.

(Related ULURPs #190251 MMQ, 190352 ZMQ, 190366 ZSQ, 190375 ZSQ)

PUBLIC HEARING

A Public Hearing was held in the Borough President's Conference Room at 120-55 Queens Boulevard on Thursday, July 11, 2019 at 10:30 A.M. pursuant to Section 82(5) of the New York City Charter and was duly advertised in the manner specified in Section 197-c (i) of the New York City Charter. The applicant made a presentation. There were ten (10) speakers in favor with five (5) speakers against. The hearing was closed.

CONSIDERATION

Subsequent to a review of the application and consideration of testimony received at the public hearing, the following issues and impacts have been identified:

- The applicant is proposing these zoning text amendments to facilitate development of a Large Scale General Development (LSGD). The designation and establishment of the area to be rezoned as a Mandatory Inclusionary Housing Area would assure that it remains an affordable housing into perpetuity. The as-of-right allowance of a PCE;
- The applicant has also concurrently filed other applications to facilitate development of the proposed LSGD. The other applications are for a rezoning to C4-4 and C4-3A, a mapping action to reopen a portion of Beach 52nd Street, a Special Permit allowing modification of yard, height and setback requirements, and a Special Permit to modify signage regulations for potential commercial uses in the LSGD;
- The proposed LSGD would total 2,371,000 gross square feet built in 11 buildings with heights varying between 8- to 19-stories over six sub-sections of the 410,052.28 sf site. There would be a total of 2,200 residential units. There would be 1,927 units for incomes up to 80% AMI including 201 units of Affordable Independent Residences for Seniors (AIRS) and 273 units of moderate income housing. A 20,000 sf supermarket would be built in Phase I of the project as part of the 72,000 sf of retail space proposed in the project. 77,000 sf of community space is proposed that would allow schools, day care or medical care facilities, or cultural space. Parking would be provided in 973 accessory parking spaces located in parking lots and garages distributed throughout the development area with 754 residential spaces, 144 retail spaces and 75 spaces for community facility/ medical office uses. A proposed privately owned, open internal roadway network with two 60 feet wide streets (north-south extension of Beach 52nd Street, and an east-west Peninsula Way between Beach 50th & Beach 53rd Streets) that would create four quadrants on the site. 24,000 sf of publicly accessible open space would be distributed throughout the site. Two major components would be an open space identified as Pedestrian Plaza (Beach 51st Street) and Highpoint Intersection (intersection of Beach 52nd Street & Peninsula Way). Both would be resilient gathering points for pedestrians with planters and seating. The Beach 51st Street open space would have a children's play area, rubber play surfaces, and a pedestrian plaza with publicly accessible amenities. The phased build out is projected to be 10 to 15 years;
- The project site is the former site of Peninsula Hospital. Since the closure of the hospital there has been no activity on the property. The immediate area surrounding the project site is predominantly developed with residential buildings. Generally to the east most of the development is in low-rise houses. The NYCHA Ocean Bay Apartments (7- and 9-story buildings) are located directly north and west of the project site. Further to the west there are a few taller residential buildings. But, the majority of buildings are also low-rise residential buildings. The elevated subway track is located to the south with the beach and waterfront directly beyond it. There are semi-industrial storage uses located along Rockaway Beach Boulevard but, not many retail or commercial uses in the area;

- Community Board 14 (CB 14) disapproved the application with conditions by a vote of twenty-eight (28) against with five (5) in favor and one (1) abstaining at a public hearing held on June 25, 2019. CB 14's conditions were as follows: reduction of total number of units by 30% to 50%; residential parking should be increased up to 75% of units; there is an existing need for school seats – a new K-8 school should be built immediately for existing area students and future students; a prevailing wage agreement for all workers should be in place; in consultation with CB 14 a holistic transportation plan for the entire peninsula should be done to mitigate existing issues and impacts from the project; the final AMI mix should be discussed with CB 14 to determine the need and what is appropriate. Senior affordable housing has strong CB 14 support; there should be 5 month progress reports by Arker to CB 14. There should be a website that provides project updates and project related job opportunities; development should be capped at 12-stories; HPD property at B48th to B 51st Streets should be deeded to Department of Parks. Arker should fund planning, construction, and maintenance of a community park with a park house, multipurpose field and running track, children's playground with water features; there should be a signed Community Benefits Agreement including jobs for local residents; minimum 50% of units should be set aside for CB 14 residents;
- The applicant at the Borough President's public hearing explained that project is intended to create new housing opportunities at varying income levels for the neighborhood, bring new economic activity into the area that would provide employment, goods and services for everyone in Rockaway. Several of those testifying in favor of the project spoke about the need for housing, jobs, goods and services that the project would make available for everyone and in particular for returning recent college graduates. Many of the people who testified against the project said there was need for increased economic activity and jobs for the neighborhood. However, there were also concerns about the number of housing units proposed, the proposed height of the buildings, and how the area is now impacted by the overburdened infrastructure and limited roadways that would be exacerbated by the increased numbers of people and vehicles drawn to the area by the proposed project and especially during a major storm emergency. The imbalance between overutilized and underutilized schools in the project area was also mentioned by some of the speakers.

RECOMMENDATION

There is a broad agreement that the former Peninsula Hospital site should be redeveloped to bring new housing and economic development into the area that needs jobs, goods and services. The differences and objections voiced by CB 14 and others in the community are about the size, density and scale of the proposed project compared to the built character of the area as it currently exists and potential negative impacts. This project should be the beginning of the revitalization of this area. But, it must be implemented with sensitivity to the existing area residents and in a manner to assure success of the project and improvements for the community.

Based on the above consideration, I hereby recommend approval of the project with the following conditions:

- There is a need for housing in the area. However, the need for housing in the area should not be met all on one site. CB 14 wanted a 30% to 50% reduction of units. The number of units should be reduced from the proposed 2200 units to 1600 units of housing. That reduction would bring the project closer to the density of the nearby Ocean Bay Apartments;
- Provision of more moderate- and medium-income units for seniors, working families and individuals who wish to stay in the community. CB 14 has requested further consultation on the AMI mix of the project. Mixed income neighborhoods are important to sustain local businesses that bring jobs, goods and services to the neighborhood;
- As proposed the project's tallest buildings would be more than double the height of other buildings in the immediate area. CB 14 has requested a 12-story cap on building heights. The heights of the tallest buildings should be lowered to be more in character with the heights of area buildings;
- CB 14 had requested provision of 75% parking for proposed units. The applicant should stay in contact with CB 14 and community groups and within a year of approval there should be a reassessment to determine the adequacy of the proposed parking and whether there are any opportunities to find more spaces to meet any unanticipated need. In any case, even with a reduction of units the proposed 973 parking spaces must be maintained;
- The developer should meet with CB 14 every five months for project updates and an opportunity to discuss the project as it moves forward;
- Continued efforts to bring Article 28 emergency medical facilities into the area. There was testimony at the public hearing that timeliness of treatment is a critical element to survive cardiac emergencies and that there were no emergency cardiac treatment centers on the Rockaway Peninsula. Cardiac and other Article 28 critical emergency treatment facilities must be made available on the Rockaway Peninsula;
- Good schools are very important to building communities. Pre-K seats should be provided onsite. CB 14 has requested a new K to 8 school to serve the project and surrounding area. The Department of Education (DOE) must dedicate the resources necessary to improve the local schools immediately to serve the students living in the district in the vicinity of the project. Going forward DOE must account for the forecasted number of students and have funding and plans in place to have seats ready in a new school to accommodate new students.



PRESIDENT, BOROUGH OF QUEENS

8/8/2019

DATE

Queens Borough President Recommendation

APPLICATION: ULURP #190366 ZSQ

COMMUNITY BOARD: Q14

DOCKET DESCRIPTION

IN THE MATTER OF an application submitted by Akerman LLP on behalf of the Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 201 of the NYC Charter for the grant of a Special Permit pursuant to Section 74-743(a)(2) of the NYC Zoning Resolution to modify:

1. the rear yard requirements of Section 23-533 (Required rear yard equivalents for Quality Housing Buildings) and Section 35-53 (Modification of Rear yard Requirements);
2. the side yard requirements of Section 35-54 (Special Provisions Applying to R1 through R5 Districts); and
3. the height and setback requirements of Section 23-664 (Modified height and setback regulations for certain Inclusionary Housing buildings or affordable independent residences for seniors) and Section 35-654 (Modified height and setback regulations for certain Inclusionary housing buildings or affordable independent residences for seniors);

in connection with a proposed mixed use development, within a large-scale general development, on property bounded by Beach Channel Drive, the westerly street line of former Beach 51st Street, a line 420 feet southerly of Beach Channel Drive, Beach 50th Street, Rockaway Beach Boulevard, a line 100 feet easterly of Beach 52nd Street, a line 85 feet northerly of Shore Front Parkway, Beach 52nd Street, Rockaway Beach Boulevard and Beach 53rd Street (Block 15842 Lot 1 & p/o Lot 100, Block 15843 Lot 1, and Block 15857 Lot 1 & p/o Lot 7), in a C4-4* and C4-3A* Districts, Borough of Queens, Community District 14.

*Note: The site is proposed to be rezoned by eliminating C1-2 District within an existing R5 district and by changing an existing R5 and C8-1 Districts to C4-4 and C4-3A Districts under a concurrent application for a Zoning Map change (C190352 ZMQ)

(Related ULURPs #190251 MMQ, 190352 ZMQ, N190364 ZRQ, 190375 ZSQ)

PUBLIC HEARING

A Public Hearing was held in the Borough President's Conference Room at 120-55 Queens Boulevard on Thursday, July 11, 2019 at 10:30 A.M. pursuant to Section 82(5) of the New York City Charter and was duly advertised in the manner specified in Section 197-c (i) of the New York City Charter. The applicant made a presentation. There were ten (10) speakers in favor with five (5) speakers against. The hearing was closed.

CONSIDERATION

Subsequent to a review of the application and consideration of testimony received at the public hearing, the following issues and impacts have been identified:

- o The applicant is requesting a Special Permit to allow a portion of a parking facility to abut an area on a neighboring property used for parking and vehicle access, instead of a required rear yard equivalent a portion of a proposed private open space and street network, and waivers of maximum base height and setback requirements to facilitate development of a proposed Large Scale General Development (LSGD);
- o The applicant has also concurrently filed other applications to facilitate development of the proposed LSGD. The other applications are for a rezoning to C4-4 and C4-3A, a mapping action to reopen a portion of Beach 52nd Street, a zoning text amendment to Appendix F of the NYC Zoning Resolution establishing and designating the area to be rezoned as a Mandatory Inclusionary Housing Area and to allow a Physical Culture Establishment within the LSGD, and a Special Permit to modify signage regulations for potential commercial uses in the LSGD;
- o The proposed LSGD would total 2,371,000 gross square feet built in 11 buildings with heights varying between 8- to 19-stories over six sub-sections of the 410,052.28 sf site. There would be a total of 2,200 residential units. There would be 1,927 units for incomes up to 80% AMI including 201 units of Affordable Independent Residences for Seniors (AIRS) and 273 units of moderate income housing. A 20,000 sf supermarket would be built in Phase I of the project as part of the 72,000 sf of retail space proposed in the project. 77,000 sf of community space is proposed that would allow schools, day care or medical care facilities, or cultural space. Parking would be provided in 973 accessory parking spaces located in parking lots and garages distributed throughout the development area with 754 residential spaces, 144 retail spaces and 75 spaces for community facility/ medical office uses. A proposed privately owned, open internal roadway network with two 60 feet wide streets (north-south extension of Beach 52nd Street, and an east-west Peninsula Way between Beach 50th & Beach 53rd Streets) that would create four quadrants on the site. 24,000 sf of publicly accessible open space would be distributed throughout the site. Two major components would be an open space identified as Pedestrian Plaza (Beach 51st Street) and Highpoint Intersection (intersection of Beach 52nd Street & Peninsula Way). Both would be resilient gathering points for pedestrians with planters and seating. The Beach 51st Street open space would have a children's play area, rubber play surfaces, and a pedestrian plaza with publicly accessible amenities. The phased build out is projected to be 10 to 15 years;
- o The project site is the former site of Peninsula Hospital. Since the closure of the hospital there has been no activity on the property. The immediate area surrounding the project site is predominantly developed with residential buildings. Generally to the east most of the development is in low-rise houses. The NYCHA Ocean Bay Apartments (7- and 9-story buildings) are located directly north and west of the project site. Further to the west there are a few taller residential buildings. But, the majority of buildings are also low-rise residential buildings. The elevated subway track is located to the south with the beach and

QUEENS BOROUGH PRESIDENT RECOMMENDATION

ULURP #190366 ZSQ

Page two

waterfront directly beyond it. There are semi-industrial storage uses located along Rockaway Beach Boulevard but, not many retail or commercial uses in the area;

- o Community Board 14 (CB 14) disapproved the application with conditions by a vote of twenty-eight (28) against with five (5) in favor and one (1) abstaining at a public hearing held on June 25, 2019. CB 14's conditions were as follows: reduction of total number of units by 30% to 50%; residential parking should be increased up to 75% of units; there is an existing need for school seats – a new K-8 school should be built immediately for existing area students and future students; a prevailing wage agreement for all workers should be in place; in consultation with CB 14 a holistic transportation plan for the entire peninsula should be done to mitigate existing issues and impacts from the project; the final AMI mix should be discussed with CB 14 to determine the need and what is appropriate. Senior affordable housing has strong CB 14 support; there should be 5 month progress reports by Arker to CB 14. There should be a website that provides project updates and project related job opportunities; development should be capped at 12-stories; HPD property at B48th to B 51st Streets should be deeded to Department of Parks. Arker should fund planning, construction, and maintenance of a community park with a park house, multipurpose field and running track, children's playground with water features; there should be a signed Community Benefits Agreement including jobs for local residents; minimum 50% of units should be set aside for CB 14 residents;
- o The applicant at the Borough President's public hearing explained that project is intended to create new housing opportunities at varying income levels for the neighborhood, bring new economic activity into the area that would provide employment, goods and services for everyone in Rockaway. Several of those testifying in favor of the project spoke about the need for housing, jobs, goods and services that the project would make available for everyone and in particular for returning recent college graduates. Many of the people who testified against the project said there was need for increased economic activity and jobs for the neighborhood. However, there were also concerns about the number of housing units proposed, the proposed height of the buildings, and how the area is now impacted by the overburdened infrastructure and limited roadways that would be exacerbated by the increased numbers of people and vehicles drawn to the area by the proposed project and especially during a major storm emergency. The imbalance between overutilized and underutilized schools in the project area was also mentioned by some of the speakers.

RECOMMENDATION

There is a broad agreement that the former Peninsula Hospital site should be redeveloped to bring new housing and economic development into the area that needs jobs, goods and services. The differences and objections voiced by CB 14 and others in the community are about the size, density and scale of the proposed project compared to the built character of the area as it currently exists and potential negative impacts. This project should be the beginning of the revitalization of this area. But, it must be implemented with sensitivity to the existing area residents and in a manner to assure success of the project and improvements for the community.

Based on the above consideration, I hereby recommend approval of the project with the following conditions:

- There is a need for housing in the area. However, the need for housing in the area should not be met all on one site. CB 14 wanted a 30% to 50% reduction of units. The number of units should be reduced from the proposed 2200 units to 1600 units of housing. That reduction would bring the project closer to the density of the nearby Ocean Bay Apartments;
- Provision of more moderate- and medium-income units for seniors, working families and individuals who wish to stay in the community. CB 14 has requested further consultation on the AMI mix of the project. Mixed income neighborhoods are important to sustain local businesses that bring jobs, goods and services to the neighborhood;
- As proposed the project's tallest buildings would be more than double the height of other buildings in the immediate area. CB 14 has requested a 12-story cap on building heights. The heights of the tallest buildings should be lowered to be more in character with the heights of area buildings;
- CB 14 had requested provision of 75% parking for proposed units. The applicant should stay in contact with CB 14 and community groups and within a year of approval there should be a reassessment to determine the adequacy of the proposed parking and whether there are any opportunities to find more spaces to meet any unanticipated need. In any case, even with a reduction of units the proposed 973 parking spaces must be maintained;
- The developer should meet with CB 14 every five months for project updates and an opportunity to discuss the project as it moves forward;
- Continued efforts to bring Article 28 emergency medical facilities into the area. There was testimony at the public hearing that timeliness of treatment is a critical element to survive cardiac emergencies and that there were no emergency cardiac treatment centers on the Rockaway Peninsula. Cardiac and other Article 28 critical emergency treatment facilities must be made available on the Rockaway Peninsula;
- Good schools are very important to building communities. Pre-K seats should be provided onsite. CB 14 has requested a new K to 8 school to serve the project and surrounding area. The Department of Education (DOE) must dedicate the resources necessary to improve the local schools immediately to serve the students living in the district in the vicinity of the project. Going forward DOE must account for the forecasted number of students and have funding and plans in place to have seats ready in a new school to accommodate new students.



PRESIDENT, BOROUGH OF QUEENS

8/8/2019

DATE

Queens Borough President Recommendation

APPLICATION: ULURP #190375 ZSQ

COMMUNITY BOARD: Q14

DOCKET DESCRIPTION

IN THE MATTER OF an application submitted by Akerman LLP on behalf of the Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 201 of the NYC Charter for the grant of a Special Permit pursuant to Section 74-744(c)(1) of the NYC Zoning Resolution to modify the surface area requirements of Section 32-64 (Surface Area and Illumination Provisions), in connection with a proposed mixed use development, within a large-scale general development, on property bounded by Beach Channel Drive, the westerly street line of former Beach 51st Street, a line 420 feet southerly of Beach Channel Drive, Beach 50th Street, Rockaway Beach Boulevard, a line 100 feet easterly of Beach 52nd Street, a line 85 feet northerly of Shore Front Parkway, Beach 52nd Street, Rockaway Beach Boulevard and Beach 53rd Street (Block 15842 Lot 1 & p/o Lot 100, Block 15843 Lot 1, and Block 15857 Lot 1 & p/o Lot 7), in a C4-4* and C4-3A* Districts, Borough of Queens, Community District 14.

*Note: The site is proposed to be rezoned by eliminating C1-2 District within an existing R5 district and by changing an existing R5 and C8-1 Districts to C4-4 and C4-3A Districts under a concurrent application for a Zoning Map change (C190352 ZMQ)

(Related ULURPs #190251 MMQ, 190352 ZMQ, N190364 ZRQ, 190366 ZSQ)

PUBLIC HEARING

A Public Hearing was held in the Borough President's Conference Room at 120-55 Queens Boulevard on Thursday, July 11, 2019 at 10:30 A.M. pursuant to Section 82(5) of the New York City Charter and was duly advertised in the manner specified in Section 197-c (i) of the New York City Charter. The applicant made a presentation. There were ten (10) speakers in favor with five (5) speakers against. The hearing was closed.

CONSIDERATION

Subsequent to a review of the application and consideration of testimony received at the public hearing, the following issues and impacts have been identified:

- The applicant is requesting a Special Permit that allow modification of signage regulations for potential commercial uses in the LSGD. The proposed Special Permit would facilitate development of a Large Scale General Development (LSGD);
- The applicant has also concurrently filed other applications to facilitate development of the proposed LSGD. The other applications are for a rezoning to C4-4 and C4-3A, a mapping action to reopen a portion of Beach 52nd Street, a zoning text amendment to Appendix F of the NYC Zoning Resolution establishing and designating the area to be rezoned as a Mandatory Inclusionary Housing Area and to allow a Physical Culture Establishment within the LSGD, and a Special Permit allowing modification of yard, height and setback requirements;
- The proposed LSGD would total 2,371,000 gross square feet built in 11 buildings with heights varying between 8- to 19-stories over six sub-sections of the 410,052.28 sf site. There would be a total of 2,200 residential units. There would be 1,927 units for incomes up to 80% AMI including 201 units of Affordable Independent Residences for Seniors (AIRS) and 273 units of moderate income housing. A 20,000 sf supermarket would be built in Phase I of the project as part of the 72,000 sf of retail space proposed in the project. 77,000 sf of community space is proposed that would allow schools, day care or medical care facilities, or cultural space. Parking would be provided in 973 accessory parking spaces located in parking lots and garages distributed throughout the development area with 754 residential spaces, 144 retail spaces and 75 spaces for community facility/ medical office uses. A proposed privately owned, open internal roadway network with two 60 feet wide streets (north-south extension of Beach 52nd Street, and an east-west Peninsula Way between Beach 50th & Beach 53rd Streets) that would create four quadrants on the site. 24,000 sf of publicly accessible open space would be distributed throughout the site. Two major components would be an open space identified as Pedestrian Plaza (Beach 51st Street) and Highpoint Intersection (intersection of Beach 52nd Street & Peninsula Way). Both would be resilient gathering points for pedestrians with planters and seating. The Beach 51st Street open space would have a children's play area, rubber play surfaces, and a pedestrian plaza with publicly accessible amenities. The phased build out is projected to be 10 to 15 years;
- The project site is the former site of Peninsula Hospital. Since the closure of the hospital there has been no activity on the property. The immediate area surrounding the project site is predominantly developed with residential buildings. Generally to the east most of the development is in low-rise houses. The NYCHA Ocean Bay Apartments (7- and 9-story buildings) are located directly north and west of the project site. Further to the west there are a few taller residential buildings. But, the majority of buildings are also low-rise residential buildings. The elevated subway track is located to the south with the beach and waterfront directly beyond it. There are semi-industrial storage uses located along Rockaway Beach Boulevard but, not many retail or commercial uses in the area;

QUEENS BOROUGH PRESIDENT RECOMMENDATION

ULURP #190375 ZSQ

Page two

- o Community Board 14 (CB 14) disapproved the application with conditions by a vote of twenty-eight (28) against with five (5) in favor and one (1) abstaining at a public hearing held on June 25, 2019. CB 14's conditions were as follows: reduction of total number of units by 30% to 50%; residential parking should be increased up to 75% of units; there is an existing need for school seats – a new K-8 school should be built immediately for existing area students and future students; a prevailing wage agreement for all workers should be in place; in consultation with CB 14 a holistic transportation plan for the entire peninsula should be done to mitigate existing issues and impacts from the project; the final AMI mix should be discussed with CB 14 to determine the need and what is appropriate. Senior affordable housing has strong CB 14 support; there should be 5 month progress reports by Arker to CB 14. There should be a website that provides project updates and project related job opportunities; development should be capped at 12-stories; HPD property at B48th to B 51st Streets should be deeded to Department of Parks. Arker should fund planning, construction, and maintenance of a community park with a park house, multipurpose field and running track, children's playground with water features; there should be a signed Community Benefits Agreement including jobs for local residents; minimum 50% of units should be set aside for CB 14 residents;
- o The applicant at the Borough President's public hearing explained that project is intended to create new housing opportunities at varying income levels for the neighborhood, bring new economic activity into the area that would provide employment, goods and services for everyone in Rockaway. Several of those testifying in favor of the project spoke about the need for housing, jobs, goods and services that the project would make available for everyone and in particular for returning recent college graduates. Many of the people who testified against the project said there was need for increased economic activity and jobs for the neighborhood. However, there were also concerns about the number of housing units proposed, the proposed height of the buildings, and how the area is now impacted by the overburdened infrastructure and limited roadways that would be exacerbated by the increased numbers of people and vehicles drawn to the area by the proposed project and especially during a major storm emergency. The imbalance between overutilized and underutilized schools in the project area was also mentioned by some of the speakers.

RECOMMENDATION

There is a broad agreement that the former Peninsula Hospital site should be redeveloped to bring new housing and economic development into the area that needs jobs, goods and services. The differences and objections voiced by CB 14 and others in the community are about the size, density and scale of the proposed project compared to the built character of the area as it currently exists and potential negative impacts. This project should be the beginning of the revitalization of this area. But, it must be implemented with sensitivity to the existing area residents and in a manner to assure success of the project and improvements for the community.

Based on the above consideration, I hereby recommend approval of the project with the following conditions:

- There is a need for housing in the area. However, the need for housing in the area should not be met all on one site. CB 14 wanted a 30% to 50% reduction of units. The number of units should be reduced from the proposed 2200 units to 1600 units of housing. That reduction would bring the project closer to the density of the nearby Ocean Bay Apartments;
- Provision of more moderate- and medium-income units for seniors, working families and individuals who wish to stay in the community. CB 14 has requested further consultation on the AMI mix of the project. Mixed income neighborhoods are important to sustain local businesses that bring jobs, goods and services to the neighborhood;
- As proposed the project's tallest buildings would be more than double the height of other buildings in the immediate area. CB 14 has requested a 12-story cap on building heights. The heights of the tallest buildings should be lowered to be more in character with the heights of area buildings;
- CB 14 had requested provision of 75% parking for proposed units. The applicant should stay in contact with CB 14 and community groups and within a year of approval there should be a reassessment to determine the adequacy of the proposed parking and whether there are any opportunities to find more spaces to meet any unanticipated need. In any case, even with a reduction of units the proposed 973 parking spaces must be maintained;
- The developer should meet with CB 14 every five months for project updates and an opportunity to discuss the project as it moves forward;
- Continued efforts to bring Article 28 emergency medical facilities into the area. There was testimony at the public hearing that timeliness of treatment is a critical element to survive cardiac emergencies and that there were no emergency cardiac treatment centers on the Rockaway Peninsula. Cardiac and other Article 28 critical emergency treatment facilities must be made available on the Rockaway Peninsula;
- Good schools are very important to building communities. Pre-K seats should be provided onsite. CB 14 has requested a new K to 8 school to serve the project and surrounding area. The Department of Education (DOE) must dedicate the resources necessary to improve the local schools immediately to serve the students living in the district in the vicinity of the project. Going forward DOE must account for the forecasted number of students and have funding and plans in place to have seats ready in a new school to accommodate new students.



PRESIDENT, BOROUGH OF QUEENS

8/8/2019

DATE

OK

Application #: **C 190375 ZSQ**

Project Name: **Peninsula Redevelopment**

CEQR Number: 18DCP124Q

Borough(s): Queens

Community District Number(s): 14

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C100000ZSQ"
 - MAIL:** Calendar Information Office, City Planning Commission, 120 Broadway, 31st Floor, New York, NY 10271
 - FAX:** to (212) 720-3488 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:

IN THE MATTER OF an application submitted by Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 201 of the New York City Charter for the grant of a special permit pursuant to Section 74-744(c)(1) of the Zoning Resolution to modify the surface area requirements of Section 32-64 (Surface Area and Illumination Provisions), in connection with a proposed mixed used development, within a large-scale general development, on property bounded by Beach Channel Drive, the westerly street line of former Beach 51st Street, a line 420 feet southerly of Beach Channel Drive, Beach 50th Street, Rockaway Beach Boulevard, a line 100 feet easterly of Beach 52nd Street, a line 85 feet northerly of Shore Front Parkway, Beach 52nd Street, Rockaway Beach Boulevard and Beach 53rd Street (Block 15842, Lot 1 & p/o Lot 100, Block 15843, Lot 1, and Block 15857 Lot 1 & p/o Lot 7), in a C4-4* and C4-3A* Districts, Borough of Queens, Community District 14.

* Note: The site is proposed to be rezoned by eliminating a C1-2 District within an existing R5 District and by changing an existing R5 and C8-1 Districts to C4-4 and C4-3A Districts under a concurrent related application for a Zoning Map change (C 190352 ZMQ).

Plans for this proposal are on file with the City Planning Commission and may be seen at 120 Broadway, 31st Floor, New York, N.Y. 10271-0001.

Applicant(s): Peninsula Rockaway Limited Partnership 1044 Northern Boulevard, 2 nd Floor Roslyn, NY 11256		Applicant's Representative: Jaclyn C. Scarinci, Esq. Akerman, LLP 666 Fifth Avenue, 20 th Floor New York, NY 10103
Recommendation submitted by: Queens Community Board 14		
Date of public hearing: June 25 2019	Location: Knights of Columbus Hall 333 Beach 90 Street	
Was a quorum present? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> <small>A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.</small>		
Date of Vote: June 25 2019	Location: 333 Beach 90 Street	
RECOMMENDATION Ed motion was to disapprove w mod/cond		
<input type="checkbox"/> Approve	<input type="checkbox"/> Approve With Modifications/Conditions	See attach + swere!
<input type="checkbox"/> Disapprove	<input type="checkbox"/> Disapprove With Modifications/Conditions *	
Please attach any further explanation of the recommendation on additional sheets, as necessary.		
Voting		
# In Favor: 28	# Against: 5	# Abstaining: 1
Total members appointed to the board:		
Name of CB/BB officer completing this form	Title	Date
Jonathan Gaska	Dist mgr	July 3 2019

Fx
7/9

On Tuesday – June 25, 2019 a Special meeting of Community Board #14Q was held at 333 Beach 90 St. Rockaway Beach, NY. A quorum being present a Public Hearing was held regarding: ULURP#’s C-190375-ZSQ, C-190366 ZSQ, C-190251 MMQ, 190325 ZMQ- Peninsula Rockaway Limited Partnership- redevelopment of Peninsula Hospital site

After a Public Hearing with 60 speakers, a presentation by the Peninsula Rockaway Limited Partnership, a statement from Councilmember Donovan Richards read by Chief of Staff Manuel Silva, the following motion carried by a vote of 28-yes; 5- no; 1 –abstention .

Motion to Disapprove with Modifications/Conditions ULURP#’s C-190375-ZSQ, C-190366 ZSQ, C-190251 MMQ, 190325 ZMQ.

1. **Density**-Total amount of units should be reduced by a minimum of 30% with strong consideration for a 50% reduction in total units.
2. **Parking** –residential parking should be increased to a minimum of 75% of total units built.
3. **Schools** – That the negative impact on local schools identified in the DEIS shall be addressed by a new K-8 Department of Education school being funded , built and zoned for new residents of the project and existing local students in the immediate area for the purpose of creating a neighborhood school.
4. **Worker Wages** - That a prevailing wage agreement be signed which will be applicable for all workers.
5. **Transportation/Traffic** -That in consultation with the Community Board and community- a holistic transportation/traffic plan be created and funded to mitigate the numerous traffic issues identified in DEIS that will affect the entire Peninsula from the East to the West ends of the District/ peninsula.
6. **AMI** -That the final AMI mix of affordable units shall be discussed with the Community Board to determine what is needed and appropriate. The board strongly supports the addition of Affordable Senior Units .
7. **Communication** - That the developer (ARKER) be required to report to the Community Board every five (5) months as to the progress of the project and to discuss and resolve issues that may arise. The developer shall create and maintain a website that shall include updates on project and job opportunities related to the project.
8. **Shadow impact**- That the height of the buildings shall not exceed 12 stories
9. **Park** - That the city owned property (HPD) located north of Beach Channel Drive between approximately Beach 51 to Beach 48 Streets be deeded to NYC Parks and Recreation Department and that the Developer (Arker) provide capital funding for the planning and construction of a community park which shall include Park House, multipurpose field and running track, children’s playground with water features. That the developer shall provide funding for maintenance of the park on a yearly basis
- 10 That a **Community Benefits Agreement** (CBA) be signed that guarantees that Community Board # 14 residents get construction and other available jobs at development site, including supermarket, etc.
- 11.**Resident Preference** - Residents of Community Board #14 shall get a minimum of a 50% preference of all available units in each phase of development.

OK



Community/Borough Board Recommendation

Pursuant to the Uniform Land Use Review Procedure

Application #: **C 190366 ZSQ**

Project Name: **Peninsula Redevelopment**

CEQR Number: 18DCP124Q

Borough(s): Queens

Community District Number(s): 14

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C100000ZSQ"
 - MAIL:** Calendar Information Office, City Planning Commission, 120 Broadway, 31st Floor, New York, NY 10271
 - FAX:** to (212) 720-3488 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:

IN THE MATTER OF an application submitted by Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 201 of the New York City Charter for the grant of a special permit pursuant to Section 74-743(a)(2) of the Zoning Resolution to modify:

- the rear yard requirements of Section 23-533 (Required rear yard equivalents for Quality Housing buildings) and Section 35-53 (Modification of Rear Yard Requirements);
- the side yard requirements of Section 35-54 (Special Provisions Applying Adjacent to R1 Through R5 Districts); and
- the height and setback requirements of Section 23-664 (Modified height and setback regulations for certain Inclusionary Housing buildings or affordable independent residences for seniors) and Section 35-654 (Modified height and setback regulations for certain Inclusionary Housing buildings or affordable independent residences for seniors);

in connection with a proposed mixed used development, within a large-scale general development, on property bounded by Beach Channel Drive, the westerly street line of former Beach 51st Street, a line 420 feet southerly of Beach Channel Drive, Beach 50th Street, Rockaway Beach Boulevard, a line 100 feet easterly of Beach 52nd Street, a line 85 feet northerly of Shore Front Parkway, Beach 52nd Street, Rockaway Beach Boulevard and Beach 53rd Street (Block 15842, Lot 1 & p/o Lot 100, Block 15843, Lot 1, and Block 15857 Lot 1 & p/o Lot 7), in a C4-4* and C4-3A* Districts, Borough of Queens, Community District 14.

* Note: The site is proposed to be rezoned by eliminating a C1-2 District within an existing R5 District and by changing an existing R5 and C8-1 Districts to C4-4 and C4-3A Districts under a concurrent related application for a Zoning Map change (C 190352 ZMQ).

Plans for this proposal are on file with the City Planning Commission and may be seen at 120 Broadway, 31st Floor, New York, N.Y. 10271-0001.

Applicant(s): Peninsula Rockaway Limited Partnership 1044 Northern Boulevard, 2 nd Floor Roslyn, NY 11256	Applicant's Representative: Jaclyn C. Scarinci, Esq. Akerman, LLP 666 Fifth Avenue, 20 th Floor New York, NY 10103
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Recommendation submitted by:
Queens Community Board 14

Date of public hearing: JUNE 25 2019 **Location:** Knights of Columbus Hall
333 Beach 90 Street

Was a quorum present? YES NO A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.

Date of Vote: JUNE 25 2019 **Location:** 333 Beach 90 Street

RECOMMENDATION

Approve Approve With Modifications/Conditions
 Disapprove Disapprove With Modifications/Conditions *see other motions*

Please attach any further explanation of the recommendation on additional sheets, as necessary.

Voting Board motion was to disapprove w mod/conditions
In Favor: 28 **# Against:** 5 **# Abstaining:** 1 **Total members appointed to the board:**

Name of CB/BB officer completing this form Jonathan GASKA	Title Dot MGT	Date July 3, 2019
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On Tuesday – June 25, 2019 a Special meeting of Community Board #14Q was held at 333 Beach 90 St. Rockaway Beach, NY. A quorum being present a Public Hearing was held regarding: ULURP#’s C-190375-ZSQ, C-190366 ZSQ, C-190251 MMQ, 190325 ZMQ- Peninsula Rockaway Limited Partnership- redevelopment of Peninsula Hospital site

After a Public Hearing with 60 speakers, a presentation by the Peninsula Rockaway Limited Partnership, a statement from Councilmember Donovan Richards read by Chief of Staff Manuel Silva, the following motion carried by a vote of 28-yes; 5- no; 1 –abstention .

Motion to Disapprove with Modifications/Conditions ULURP#’s C-190375-ZSQ, C-190366 ZSQ, C-190251 MMQ, 190325 ZMQ.

1. **Density**-Total amount of units should be reduced by a minimum of 30% with strong consideration for a 50% reduction in total units.
2. **Parking** –residential parking should be increased to a minimum of 75% of total units built.
3. **Schools** – That the negative impact on local schools identified in the DEIS shall be addressed by a new K-8 Department of Education school being funded , built and zoned for new residents of the project and existing local students in the immediate area for the purpose of creating a neighborhood school.
4. **Worker Wages** - That a prevailing wage agreement be signed which will be applicable for all workers.
5. **Transportation/Traffic** -That in consultation with the Community Board and community- a holistic transportation/traffic plan be created and funded to mitigate the numerous traffic issues identified in DEIS that will affect the entire Peninsula from the East to the West ends of the District/ peninsula.
6. **AMI** -That the final AMI mix of affordable units shall be discussed with the Community Board to determine what is needed and appropriate. The board strongly supports the addition of Affordable Senior Units .
7. **Communication** - That the developer (ARKER) be required to report to the Community Board every five (5) months as to the progress of the project and to discuss and resolve issues that may arise. The developer shall create and maintain a website that shall include updates on project and job opportunities related to the project.
8. **Shadow impact**- That the height of the buildings shall not exceed 12 stories
9. **Park** - That the city owned property (HPD) located north of Beach Channel Drive between approximately Beach 51 to Beach 48 Streets be deeded to NYC Parks and Recreation Department and that the Developer (Arker) provide capital funding for the planning and construction of a community park which shall include Park House, multipurpose field and running track, children’s playground with water features. That the developer shall provide funding for maintenance of the park on a yearly basis
- 10 That a **Community Benefits Agreement** (CBA) be signed that guarantees that Community Board # 14 residents get construction and other available jobs at development site, including supermarket, etc.
- 11.**Resident Preference** - Residents of Community Board #14 shall get a minimum of a 50% preference of all available units in each phase of development.

ok

NYC PLANNING
DEPARTMENT OF CITY PLANNING CITY OF NEW YORK

Community/Borough Board Recommendation
Pursuant to the Uniform Land Use Review Procedure

Application #: C 190251 MMQ	Project Name: Peninsula Hospital Redevelopment Plan
CEQR Number: 18DCP124Q	Borough(s): Queens Community District Number(s): 14

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C10000ZSQ"
 - MAIL:** Calendar Information Office, City Planning Commission, Room 2E, 22 Reade Street, New York, NY 10007
 - FAX:** (212) 720-3356 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:

IN THE MATTER OF an application submitted by Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 199 of the New York City Charter for an amendment to the City Map involving:

- the establishment of a portion of Beach 52nd Street between Rockaway Beach Boulevard and Shorefront Parkway;
- the adjustment of grades and block dimensions necessitated thereby;

including authorization for any acquisition or disposition of real property related thereto, in Community District 14, Borough of Queens, in accordance with Map No. 5033 dated April 17, 2019 and signed by the Borough President.

Applicant(s): Peninsula Rockaway Limited Partnership 1044 Northern Boulevard, 2nd Floor Roslyn, NY 11256 516.277.9300	Applicant's Representative: Eleanore C. Martin, Esq. Akerman LLP 666 Fifth Avenue, 20th Floor New York, NY 10103 212.259.6456
Recommendation submitted by: Queens Community Board 14	
Date of public hearing: June 25 2019 Location: Knights of Columbus Hall 333 Beach 90 Street	
Was a quorum present? YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> <i>A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.</i>	
Date of Vote: June 25 2019 Location: 333 Beach 90 Street	
RECOMMENDATION Bd motion was to disapprove w mod/condn - see Attachment sheet	
<input checked="" type="checkbox"/> Approve	<input checked="" type="checkbox"/> Approve With Modifications/Conditions
<input checked="" type="checkbox"/> Disapprove	<input checked="" type="checkbox"/> Disapprove With Modifications/Conditions
Please attach any further explanation of the recommendation on additional sheets, as necessary.	
Voting # In Favor: <u>28</u> # Against: <u>5</u> # Abstaining: <u>1</u> Total members appointed to the board:	
Name of CB/BB officer completing this form Jonathan GASKA	Title Dist Mgr
	Date July 3 2019

On Tuesday – June 25, 2019 a Special meeting of Community Board #14Q was held at 333 Beach 90 St. Rockaway Beach, NY. A quorum being present a Public Hearing was held regarding: ULURP#’s C-190375-ZSQ, C-190366 ZSQ, C-190251 MMQ, 190325 ZMQ- Peninsula Rockaway Limited Partnership- redevelopment of Peninsula Hospital site

After a Public Hearing with 60 speakers, a presentation by the Peninsula Rockaway Limited Partnership, a statement from Councilmember Donovan Richards read by Chief of Staff Manuel Silva, the following motion carried by a vote of 28-yes; 5- no; 1 –abstention .

Motion to Disapprove with Modifications/Conditions ULURP#’s C-190375-ZSQ, C-190366 ZSQ, C-190251 MMQ, 190325 ZMQ.

1. **Density**-Total amount of units should be reduced by a minimum of 30% with strong consideration for a 50% reduction in total units.
2. **Parking** –residential parking should be increased to a minimum of 75% of total units built.
3. **Schools** – That the negative impact on local schools identified in the DEIS shall be addressed by a new K-8 Department of Education school being funded , built and zoned for new residents of the project and existing local students in the immediate area for the purpose of creating a neighborhood school.
4. **Worker Wages** - That a prevailing wage agreement be signed which will be applicable for all workers.
5. **Transportation/Traffic** -That in consultation with the Community Board and community- a holistic transportation/traffic plan be created and funded to mitigate the numerous traffic issues identified in DEIS that will affect the entire Peninsula from the East to the West ends of the District/ peninsula.
6. **AMI** -That the final AMI mix of affordable units shall be discussed with the Community Board to determine what is needed and appropriate. The board strongly supports the addition of Affordable Senior Units .
7. **Communication** - That the developer (ARKER) be required to report to the Community Board every five (5) months as to the progress of the project and to discuss and resolve issues that may arise. The developer shall create and maintain a website that shall include updates on project and job opportunities related to the project.
8. **Shadow impact**- That the height of the buildings shall not exceed 12 stories
9. **Park** - That the city owned property (HPD) located north of Beach Channel Drive between approximately Beach 51 to Beach 48 Streets be deeded to NYC Parks and Recreation Department and that the Developer (Arker) provide capital funding for the planning and construction of a community park which shall include Park House, multipurpose field and running track, children’s playground with water features. That the developer shall provide funding for maintenance of the park on a yearly basis
- 10 That a **Community Benefits Agreement** (CBA) be signed that guarantees that Community Board # 14 residents get construction and other available jobs at development site, including supermarket, etc.
11. **Resident Preference** - Residents of Community Board #14 shall get a minimum of a 50% preference of all available units in each phase of development.



Community/Borough Board Recommendation
Pursuant to the Uniform Land Use Review Procedure

Application # **C 190325 ZMQ**

Project Name **Peninsula Redevelopment**

CEQR Number **18DCP124Q**

Borough(s): **Queens**

Community District Number(s): **14**

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C100000ZSQ"
 - MAIL:** Calendar Information Office, City Planning Commission, 120 Broadway, 31st Floor, New York, NY 10271
 - FAX:** to (212) 720-3488 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description

IN THE MATTER OF an application submitted by Peninsula Rockaway Limited Partnership pursuant to Sections 197-c and 201 of the New York City Charter for the amendment of the Zoning Map, Section No. 30c:

- eliminating from within an existing R5 District a C1-2 District bounded by a line 420 feet southerly of Beach Channel Drive, Beach 50th Street, Rockaway Beach Boulevard, and the easterly street line of former Beach 51st Street.
- changing from an R5 District to a C4-4 District property bounded by Beach Channel Drive, the westerly street line of former Beach 51st Street, a line 420 feet southerly of Beach Channel Drive, Beach 50th Street, Rockaway Beach Boulevard, and Beach 53rd Street; and
- changing from a C8-1 District to a C4-3A District property bounded by Rockaway Beach Boulevard, a line 100 feet easterly of Beach 52nd Street, a line 85 feet northerly of Shore Front Parkway, and Beach 52nd Street.

Borough of Queens, Community District 14, as shown on a diagram (for illustrative purposes only) dated May 6, 2019, and subject to the conditions of CEQR Declaration E-532.

Applicant(s): Peninsula Rockaway Limited Partnership 1044 Northern Boulevard, 2 nd Floor Roslyn, NY 11256		Applicant's Representative: Jaclyn C. Scarinci, Esq. Akerman, LLP 666 Fifth Avenue, 20 th Floor New York, NY 10103	
Recommendation submitted by: Queens Community Board 14			
Date of public hearing: June 25, 2019		Location: Knights of Columbus 333 Beach 90 St	
Was a quorum present? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.	
Date of Vote: June 25, 2019		Location: 333 Beach 90 St	
RECOMMENDATION bd motion voted on - Disapprove w/ cond/mod			
<input type="checkbox"/> Approve		<input type="checkbox"/> Approve With Modifications/Conditions	
<input type="checkbox"/> Disapprove		<input checked="" type="checkbox"/> Disapprove With Modifications/Conditions → see #1 in the motion	
Please attach any further explanation of the recommendation on additional sheets, as necessary.			
Voting			
# In Favor: 28		# Against: 5 # Abstaining: 1 Total members appointed to the board:	
Name of CB/BB officer completing this form Jonathan GASKA		Title Dist Mgr	Date July 3, 2019

On Tuesday – June 25, 2019 a Special meeting of Community Board #14Q was held at 333 Beach 90 St. Rockaway Beach, NY. A quorum being present a Public Hearing was held regarding: ULURP#’s C-190375-ZSQ, C-190366 ZSQ, C-190251 MMQ, 190325 ZMQ- Peninsula Rockaway Limited Partnership- redevelopment of Peninsula Hospital site

After a Public Hearing with 60 speakers, a presentation by the Peninsula Rockaway Limited Partnership, a statement from Councilmember Donovan Richards read by Chief of Staff Manuel Silva, the following motion carried by a vote of 28-yes; 5- no; 1 –abstention .

Motion to Disapprove with Modifications/Conditions ULURP#’s C-190375-ZSQ, C-190366 ZSQ, C-190251 MMQ, 190325 ZMQ.

1. **Density**-Total amount of units should be reduced by a minimum of 30% with strong consideration for a 50% reduction in total units.
2. **Parking** –residential parking should be increased to a minimum of 75% of total units built.
3. **Schools** – That the negative impact on local schools identified in the DEIS shall be addressed by a new K-8 Department of Education school being funded , built and zoned for new residents of the project and existing local students in the immediate area for the purpose of creating a neighborhood school.
4. **Worker Wages** - That a prevailing wage agreement be signed which will be applicable for all workers.
5. **Transportation/Traffic** -That in consultation with the Community Board and community- a holistic transportation/traffic plan be created and funded to mitigate the numerous traffic issues identified in DEIS that will affect the entire Peninsula from the East to the West ends of the District/ peninsula.
6. **AMI** -That the final AMI mix of affordable units shall be discussed with the Community Board to determine what is needed and appropriate. The board strongly supports the addition of Affordable Senior Units .
7. **Communication** - That the developer (ARKER) be required to report to the Community Board every five (5) months as to the progress of the project and to discuss and resolve issues that may arise. The developer shall create and maintain a website that shall include updates on project and job opportunities related to the project.
8. **Shadow impact**- That the height of the buildings shall not exceed 12 stories
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- 10 That a **Community Benefits Agreement** (CBA) be signed that guarantees that Community Board # 14 residents get construction and other available jobs at development site, including supermarket, etc.
- 11.**Resident Preference** - Residents of Community Board #14 shall get a minimum of a 50% preference of all available units in each phase of development.

Dr. Harold Paez
Chairman, Youth Services & Education Committee
Community Board 14, Queens
126-10 Rockaway Beach Blvd.
Belle Harbor, NY 11694

24 August 2019

City Planning Commission
120 Broadway
New York, NY 10271

Re: Peninsula Hospital Site Redevelopment and DEIS

Dear City Planning Commission Members,

I am writing today to submit my commentary on the proposed development of the old Peninsula Hospital site. It is my considered opinion that the proposal calling for 2200 units of housing to be developed within a 10-acre site in Rockaway is too large and dense for this community. I urge the City Planning Commission to follow the recommendation of the members of Community Board 14, which voted to reject the Peninsula Hospital Plan in its current form, and request a redesign by the developer more in line with the wishes and resources of the Rockaway community.

Three main issues are of particular concern;

1. The entirety of the dwelling units are aimed at the affordable housing market which includes a large percentage of families with children. When we consider the large number of housing units involved (2200 dwelling units) and the impact on the local public schools, we automatically have to consider the difficult school situation in this part of Rockaway.

As the former President of the Community Education Council for District 27(including Rockaway) I want to make it clear that Rockaway is in a state of crisis when it comes to public schools.

While we are home to approximately 5% of the population of Queens County, Rockaway also happens to have 44% of the public schools listed by the State Department of Education as "Priority" status up until 2018, meaning that the schools have been performing in the lowest 5% of all public schools in the state of New York.

Furthermore, we had one of only two schools in Queens County designated as "Persistently Dangerous" by the state in 2017. These are schools which are under review due to the unusually high level of serious and violent incidents reported on the official school incident reporting system (VADIR).

Rockaway is also home to a number of public schools that were on the Mayor's Renewal School list, meaning they are persistently struggling schools in danger of closing. In fact, it was only two years ago that two public schools were slated for closure by then Schools' Chancellor Farina, but received a last - minute reprieve after large public outcry. These failing schools are concentrated within the exact zone proposed for this 2200-unit development which would be filled with children enrolling in the local public schools.

In summary, the Peninsula Proposal plans to build-up a huge housing development where children from low-income households will be moving into zones with failing schools. I ask, what parent will willingly move into a housing development where their local schools are on the Mayor's Renewal list of persistently struggling schools or the State's list of the lowest 5% of performance year after year? This is a recipe for maintaining the cycle of poverty in my humble opinion, but it is an opinion based on experience working on the Education Council, on Community Board 14, and as a parent with two children in the NYC public school system. Additionally, the environmental impact study submitted to the

community board for review concludes that the large scale of this project will have an “unavoidable adverse impact” on the elementary schools and middle schools located within the impact zone due to the overcrowding involved. Large and overcrowded class size has been shown in studies to be directly detrimental to student progress and learning. The current Peninsula Hospital proposal has no provision for addressing these community concerns surrounding public schools in this area.

2. Transportation in Rockaway is a constant consideration for low income families. The 2200 unit proposal would presumably include a significant percentage of families struggling to make ends meet. Many families in New York City today are single parent households or households where both parents must work in order to meet the high price of living in NYC. Add to this scenario, an average commute time of one and a half hour by subway to Manhattan each way. With subway delays or closures it is not unreasonable to expect tenants of this massive housing complex to spend 3-4 hours of their day commuting to work, while children are left at home waiting for commuting parents.

Diminished quality of life has been directly linked to the amount of time spent on a stressful commute and Rockaway has among the longest commutes in the city of New York. My concern here is that we are setting up a large community at the farthest reaches of NYC where residents may not be benefitting from the quality of life to be found living closer to the center of the city. Meanwhile, any benefit from living in a seaside community is lost within the massive scale of the proposed project.

3. Rockaway has a long way to go in terms of amenities needed to support high density urban development. There is one hospital that serves the entire community and the peninsula is geographically isolated. In times of emergency, the geographic isolation has the effect of compounding the severity of the emergency as we learned following Hurricane Sandy. We are a seaside community which has developed from what were once seasonal living areas such as the bungalow communities still scattered throughout the peninsula. Additionally, many homes and businesses are still recovering from the devastation of Hurricane Sandy 6 years ago. What happens to these families in a large scale, high-rise development should another Hurricane strike in the future? The issues of evacuation, transportation, electricity and public safety are amplified with the large numbers of individuals involved.

Getting back to the topic of community amenities; Rockaway has no movie theaters, no museums, no community colleges, no large recreational centers or large retail centers like those in the rest of Queens. The beach is wonderful but only available 3 months in the Summer for most individuals. What is to happen with all these families being placed in a high-density development in the middle of Far Rockaway with very little community amenities available? The only solid proposal put forward by the developers is for a supermarket and “community space”. With a proposal this large, the discussion should include the details of a public park, recreational facilities such as a public pool, organized sports activities and other planned proposals to enhance the quality of life for residents. This discussion has been absent from the developer’s presentations thus far.

I hope this letter serves to inform the members of the City Planning Commission about just some of the concerns that residents of Rockaway have had regarding the housing proposal. Please feel free to contact me directly for any additional information or elaboration I can provide on these issues. I hope that you fully consider the concerns I've put forward in order to scale down the proposal by a considerable measure. This way, the city can ensure that the quality of life envisioned by such a new development can be delivered without the heavy downside that overburdening a community will entail.

Sincerely,

Harold Paez

Dr. Harold Paez

Community Board 14

Chairman, Youth Services and Education Committee

Tel. # (917) 579-3557

From: [PublicComments_DL](#)
To: [Hallah Saleh \(DCP\)](#); [QueensComments_DL](#)
Subject: Comments re: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan
Date: Monday, August 26, 2019 4:51:31 PM

Re. Project: **C 190325 ZMQ - Peninsula Hospital Redevelopment Plan**

- Application Number: **C 190325 ZMQ**
- Project: **Peninsula Hospital Redevelopment Plan**
- Public Hearing Date: **08/14/2019**
- Borough: **Queens**
- Community District: **14**

Submitted by:

Name: **John Cori**
Zip: **11693**

I represent:

- **Myself**
- **A local community group or organization**

Details for "I Represent": **CB 14 Queens Chair of CB 14 economic development Land use Committee member.**

My Comments:

Vote: I am **other**

Have you previously submitted comments on this project? **Yes**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:

Yes

Additional Comments:

I have testified as CB 14 member. I was one of 5 people who spoke as "opposed" on the project. I clarified that CB 14 position was a technical "no" Vote. Our Goal is to prompt the developer to give more to the immediate community, as in a new school or a possible movie theater. It was pointed out at the hearing that few folks who spoke to get better for the community were just "dog whistling" for prevention of more black and brown folks to the community. It was the opinion of Mr Milan Taylor Who testified this. Mr Taylor backed up his outlandish opinion with his own out landing opinions NOT facts. While Mr Taylor suggests that CB14 is 70% white while the population is only 30% white. The FACTS ARE CB 14 is in fact 78% black and Hispanic. And only 32% white. Mr Taylor also mislead the

actual 28-5 vote to the CPC to say “no” with conditions to the project. Mr Taylor implied that of the 28-5 most were white in-FACT 13 of the 28 votes to reject the project as proposed were IN FACT 13 Black and Hispanic. All these FACTS can be verified By CB14 dist Man Jonathan Gaska. I would also like to point out the “Elegant in the room” comment was highly inappropriate without facts. While Mr Taylor is entitled to his own opinion he is not entitled to his own facts. I’d like a written apology. Thank you John Cori

From: [PublicComments_DL](#)
To: [Hallah Saleh \(DCP\)](#); [QueensComments_DL](#)
Subject: Comments re: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan
Date: Monday, August 26, 2019 11:12:17 AM

Re. Project: **C 190325 ZMQ - Peninsula Hospital Redevelopment Plan**

- Application Number: **C 190325 ZMQ**
- Project: **Peninsula Hospital Redevelopment Plan**
- Public Hearing Date: **08/14/2019**
- Borough: **Queens**
- Community District: **14**

Submitted by:

Name: **Michael tubridy**
Zip: **11694**

I represent:

- **Myself**
- **The local community board**

Details for "I Represent": **Co-chair of community board 14 land use**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

It is too dense a project for such a small 10-acre site

Peninsula Hospital Site Redevelopment

August 2019

Testimony before the NYC Planning Commission in regard to the redevelopment of the Peninsula Hospital site submitted by The Arker Company d/b/a Peninsula Rockaway Limited Partnership.
This submission is by the *Bayswater Civic Association*.



CEQR No.
18DCP124Q

ULURP Nos.
190251 MMQ
190325 ZMQ
N190364 ZRQ
190366 ZSQ
190375 ZSQ

My name is Eugene Falik. I am a new resident of the Rockaways having lived here only since 1950 although my grandparents lived in the Rockaways before me. I am representing the Bayswater Civic Association, a group of residents on the east end of Rockaway.

We believe that the developer's proposal is seriously flawed in several major aspects.

- The population density is excessive. It is similar to midtown Manhattan.
- The building size is not in context with the neighborhood where tall buildings are seven to twelve stories tall.
- The plot layout is not in character with the neighborhood where almost all buildings are surrounded by grass and shrubbery.
- The project will overtax already failing schools that are currently operating over capacity. If the project is built as proposed, there will be a shortage of 2,000 elementary and middle school seats.
- The proposed parking is grossly inadequate. Even residents of NYCHA housing have cars so that they can get to work and shop in Nassau in a reasonable time frame.
- The transportation impact will be disastrous:
 - The developer acknowledges that even if DOT implements all of their suggestions, the project will adversely impact traffic from the New York City line to Beach 116th Street.
 - There are only two lanes of traffic in each direction that run from Far Rockaway the length of the peninsula to Rockaway Park.
 - In addition to the impact on the general public, emergency response will be seriously affected for the entire peninsula.
 - Bus service will be adversely impacted and additional bus service will only make traffic worse.
 - Service on the "A" train, despite the developer's statements is standing room only.
- The project will bring more people with limited resources to an area that is already largely populated with people of limited resources.
- The project will only provide 13% of the apartments to moderate income families. All of the rest will go to those with extremely low, very low, or low incomes. Despite the

developer's claims, most of the apartments will not be available to couples consisting of firefighters, police officers, or teachers with as few as five years in the job or even those making a bit over minimum wage.

- The Rockaways is an area of limited resources and few jobs. The 300 jobs that the developer claims will be contributed to the community are far fewer than the jobless residents to be added.
- Rockaway already has half of the publicly financed housing in Queens.
- The project will accentuate racial and economic segregation in violation of the *Fair Housing Act of 1968*.
- The project goes against the city's own recent *Resilient Edgemere* study prepared by HPD which recommended only low density housing (1 or 2 families), stores, and parkland be built in the area.

Commissioners, we ask that you deny the developer's request as currently submitted. We believe that no more than 1,000 apartments should be permitted on this tiny 10 acre plot with at least 85% parking.

We will submit a more detailed response (approximately 70 pages) explaining why the application should be rejected or significantly modified in a bit over a week.

Peninsula Hospital Site Redevelopment

May 2019

Draft Environmental Impact Statement

This is a response to the Draft Environmental Impact Statement for the redevelopment of the Peninsula Hospital site submitted by The Arker Company d/b/a Peninsula Rockaway Limited Partnership.

**This submission is by the
*Bayswater Civic Association.***



Figure 1 Manhattan street or Rockaway?

CEQR No.
18DCP124Q

ULURP Nos.
190251 MMQ
190325 ZMQ
N190364 ZRQ
190366 ZSQ
190375 ZSQ

PENINSULA HOSPITAL SITE REDEVELOPMENT

DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Project Location: Community District 14, Borough of Queens

CEQR No.: 18DCP124Q

Type of Action: Unlisted

ULURP Nos.: 190251 MMQ, 190325 ZMQ, N190364 ZRQ, 190366 ZSQ, and 190375 ZSQ

Lead Agency: City Planning Commission, City of New York
Marisa Lago, Chair

Lead Agency Contact Olga Abinader
Acting Director, Environmental Assessment & Review Division
New York City Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271-3100
212-720-3493
oabinad@planning.nyc.gov

Applicant: Peninsula Rockaway Limited Partnership

Prepared by: Sam Schwartz Engineering, D.P.C.
322 Eighth Avenue, 5th Floor
New York, NY 10001
Date: May 3, 2019

DEIS Response: Submitted by: Eugene Falik on behalf of the Bayswater Civic Association
1034 Dickens Street; Far Rockaway, NY 11691, and
Glenn DiResto, 173 Schooner Street, Arverne, NY 11692

Public hearing on the DEIS were held on:

- 6/25/2019 – Community Board 14
- 7/11/2019 – Queens Borough President
- 8/14/2019 – City Planning Commission

Written comments on the DEIS are requested and would be received and considered by the Lead Agency until the 10th calendar day following the close of the public hearing.

The DEIS is available on the website of the New York City Department of City Planning:

<http://www1.nyc.gov/site/planning/applicants/eis-documents.page>

The Bayswater Civic Association response to the DEIS is available at:

http://bayswatercivic.org/Peninsula%20Hospital%20DEIS_Response.pdf

Contents

Contents	3
Figures.....	5
Chapter 0: Executive Summary	6
Introduction.....	6
Overview.....	7
Density and Character of the Neighborhood	7
Income Levels and Stores	8
Transportation.....	9
Education	9
Summary	9
Summary of Responses to Specific Chapters	11
Chapter 1: Project Description.....	11
Chapter 2: Land Use, Zoning, and Public Policy.....	12
Chapter 3 Socioeconomic Conditions.....	13
Chapter 4: Community Facilities and Services (Schools, Libraries, Day Care).....	14
Chapter 5: Open Space.....	14
Chapter 6: Shadows	15
Chapter 7: Historic and Cultural Resources.....	15
Chapter 8: Urban Design and Visual Resources.....	15
Chapter 9: Hazardous Materials.....	15
Chapter 10: Water and Sewer Infrastructure	16
Chapter 11: Solid Waste and Sanitation Services.....	16
Chapter 12: Transportation	16
Chapter 13: Air Quality	16
Chapter 14: Greenhouse Gas Emissions and Climate Change	17
Chapter 15: Noise	17
Chapter 16: Public Health.....	17
Chapter 17: Neighborhood Character	18
Chapter 18: Construction	19
Chapter 19: Alternatives	20
Chapter 20: Mitigation.....	20

Chapter 21: Unavoidable Adverse Impacts	21
Chapter 22: Growth-Inducing Aspects of the Proposed Project.....	21
Chapter 23: Irreversible and Irretrievable Commitments of Resources	21
Chapter 1: Project Description.....	23
Income levels	24
Incomes	28
Density	29
Other	33
Other things to consider	35
Chapter 2: Land Use, Zoning, and Public Policy.....	38
Chapter 4: Community Facilities and Services (Schools, Libraries, Day Care).....	44
Education, generally	45
Chapter 6: Shadows	48
Chapter 7: Historic and Cultural Resources.....	49
Chapter 8: Urban Design and Visual Resources.....	49
Chapter 9: Hazardous Materials.....	49
Chapter 10: Water and Sewer Infrastructure	50
Chapter 11: Solid Waste and Sanitation Services.....	51
Chapter 12: Transportation	52
Chapter 13: Air Quality	55
Chapter 14: Greenhouse Gas Emissions and Climate Change	57
Chapter 15: Noise	58
Chapter 16: Public Health.....	59
Chapter 17: Neighborhood Character	60
Chapter 18: Construction	63
Chapter 19: Alternatives	64
Chapter 20: Mitigation.....	66
Community Facilities and Services – Schools.....	66
Open Space	66
Noise	66
Transportation.....	66
Chapter 21: Unavoidable Adverse Impacts	68

Schools	68
Parks and Open Space.....	68
Transportation	68
Traffic	68
Transit	68
Pedestrians	69
Summary.....	69
Noise	69
Construction.....	69
Summary.....	69
Chapter 22: Growth-Inducing Aspects of the Proposed Project.....	71
Chapter 23: Irreversible and Irretrievable Commitments of Resources	72

Figures

Figure 1 Manhattan street or Rockaway?	1
Figure 2 - Project in context of the neighborhood	8
Figure 3 - People per acre (NYC Department fo City Planning).....	19
Figure 4 - Eligible Income Levels by Household Size (NYC)	25
Figure 5 - CityLimits.org: Major losses of low rent apartments since 2011	27
Figure 6 - People per Acre (NYC Department of City Planning).....	31
Figure 7 - Lorraine Collins, Enterprise Community Partners statement	34
Figure 8 - Donations to Mayor de Blasio.....	37
Figure 9 - People per Acre (NYC Department of City Planning).....	61

Chapter 0: Executive Summary

Introduction

There is no doubt that housing is needed in New York City. Likewise, there is no doubt that housing is needed for low income families. But housing is likewise needed for moderate and middle income families too. And housing must be in the context of the community, without adversely impacting existing members of both the local community and the broader Community District. This project fails to address the broad range of housing and overall community needs.

Our fundamental issues with the plan are:

- The population density is excessive for Rockaway. It is similar to midtown Manhattan. (Chapter 1)
- The project will only provide 13% of the apartments to moderate income families and none are for middle income ones. All of the rest will go to those with extremely low, very low, or low incomes. Despite the developer's claims, most of the apartments will not be available to couples consisting of firefighters, police officers, or teachers with as few as five years in the job or even those making a bit over minimum wage. (Chapter 1)
- The Rockaways is an area of limited resources and few jobs. The 300 jobs that the developer claims will be contributed to the community are far fewer than the jobless residents to be added. (Chapter 1)
- Rockaway already has half of the publicly financed housing in Queens. (Chapter 1).

- The project clearly violates the U.S. *Fair Housing Act of 1968* as interpreted by the Supreme Court as recently as 2015 in that it will accentuate racial and economic segregation in violation of the *Act*. (Chapter 2)

- The building size is not in context with the neighborhood where tall buildings are seven to twelve stories tall. (Chapter 2)
- The plot layout is not in character with the neighborhood where almost all buildings are surrounded by grass and shrubbery. (Chapter 2)

- The project goes against the city's own recent *Resilient Edgemere* study prepared by HPD which recommended only low density housing (1 or 2 families), stores, and parkland be built in the area. (Chapter 2)

- The project will bring more people with limited resources to an area that is already largely populated with people of limited resources. (Chapter 3)

- The project will overtax already failing schools that are currently operating over capacity. If the project is built as proposed, there will be a shortage of 2,000 elementary and middle school seats as well as local child care. Local high schools too would be overcrowded but since high schools are measured on a borough basis, that isn't reported (Chapter 4)
- The proposed parking is grossly inadequate. Even residents of NYCHA housing have cars so that they can get to work and shop in Nassau in a reasonable time frame. (Chapter 12)
- The transportation impact will be disastrous: (Chapter 12)
 - The developer acknowledges that even if DOT implements all of their suggestions, the project will have serious adverse impacts on traffic from the New York City line to Beach 116th Street. (Chapter 12)
 - There are only two lanes of traffic in each direction that run from Far Rockaway the length of the peninsula to Rockaway Park. (Chapter 12)
 - In addition to the impact on the general public, emergency response will be seriously affected for the entire peninsula. **There should be an opinion from NYPD and FDNY on the subject of the impact of traffic on emergency response times.** (Chapter 12)
 - Bus service will be adversely impacted and additional bus service will only make traffic worse.
 - Service on the “A” train, despite the developer’s statements is standing room only.
- Retail, the only good thing about the project, would probably fail as stores in the area have failed in the past due to lack of disposable income.

In addition, the developer skims over the very many adverse impacts of the proposed zoning changes and engages in segmented analysis. These impacts would affect the local community (1/4 mile radius) as well as the entire Rockaway peninsula. And to say that it is full of prejudicial language would be an understatement. It regards any land use other than housing as being “underutilized.” Of course, the most significant underutilized piece of land in New York City is Central Park. No doubt Arker would like to bring that area to its “highest and best use.” But some think otherwise.

Overview

Density and Character of the Neighborhood

A prime rule of zoning is the character of the neighborhood. This project would be completely out of character with the neighborhood which consists of a mix of low rise, single and two family homes and six to thirteen floor NYCHA apartment houses on large grass areas. The project proposes buildings as high as nineteen stories – almost two times the height of the NYCHA buildings!

The density of the proposed apartments is also a problem. Of course the single and two family houses provide a low density environment but the NYCHA buildings also have a very much lower density than the proposal. And the existing housing has vast green spaces. The developer discusses “open spaces” meaning streets and sidewalks with lots of concrete and asphalt but no green areas (unless they are painted cement).

The developer proposes to roughly double the population of the area and significantly increase the population of the Community Board as a whole.

See, from the developer’s own submission (DEIS, figure 1-6) how the project fits into the character of the neighborhood.



Figure 2 - Project in context of the neighborhood

Income Levels and Stores

The developer claims that this density is necessary to support the stores. Now the fact of the matter is that the area would certainly benefit from more retail. But successful retail requires disposable income and the proposal insures that residents will have minimal disposable income. In fact, it is very heavily biased against working families. Assuming a fifteen dollar per hour minimum wage and 2,000 work hours per year, a husband and wife earning minimum wage would have a gross annual income of \$60,000, near the top of the development’s income range.

Indeed, the developer has suggested in community presentations that the project is intended for typical city employees such as police officers, firefighters, and teachers. To support this argument, the developer cites starting salaries for a single employee. But a closer look reveals the truth. The starting salary for an NYPD officer is \$42,500. After five and a half years, the typical NYC police officer earns about \$85,292 per year. Night differential, overtime, etc. may bring this to over \$100,000 annually. (<https://www1.nyc.gov/site/nypd/careers/police->

[officers/po-benefits.page](#)) A teacher with a bachelor's degree and no prior teaching experience starts at \$56,711 while a teacher with a master's degree and eight years experience earns \$85,794! ([teachnyc.net/about-our-schools/salary-and-benefits](#)) Working couples in the NYPD, FDNY, or Board of Ed would not be eligible for apartments in the proposed project. It is clear that the developer's statements are **a bald faced lie.**

Transportation

The discussion of transportation issues is equally outrageous.

While it is true that the nearest subway stations can handle additional riders, trains are standing room only when they leave the Rockaways. Thus, while the stations have capacity, the trains don't. There is effectively no additional capacity in the Cranberry Street Tunnel that carries the "A" train from Brooklyn to Manhattan to run more trains.

There is extensive analysis of various affected street intersections, but the facts are that there are only two lanes in each direction through the Rockaways. One lane on Beach Channel Drive and a second lane on Edgemere Avenue / Rockaway Beach Boulevard (each way). These roads are already models of traffic jams during rush hours. Adding more busses will only make traffic worse. And of course the residents (pedestrians) will also occupy roadway space. No amount of jiggering traffic light timing will solve the problem.

The final transportation issue is parking. The developer has claimed that there is no parking problem because not all of the spaces in the NYCHA lots are rented. That is true only because residents can't afford the fees. But their cars fill all of the streets for blocks past the projects. Arker only wants to provide parking for 35% of the residents but Rockaway is more like a typical suburban town. A car is necessary to go anywhere. Yes, people who have no other choice use the Q 22 bus, but it is only a small exaggeration to say that people have died of old age or frozen to death waiting for it. And a fifteen minute car ride takes 45 minutes by bus (after you board) so no one who has a choice takes the bus. 35% parking is completely inadequate. The police recognize the problem and allow double parking on Edgemere Avenue, adjacent to the Freeway for this reason.

Education

The development would add some 1,500 students to the local elementary schools that are already over capacity (and under performing). There is nothing in the proposal to address this matter. Not only does the project fail to address the education issue, but it would absorb one of the few open spaces where new schools could be built.

Summary

The developer discusses "Publicly available open space" – i.e. streets and sidewalks. The project includes no green spaces unless one includes trees in concrete pits.

The developer cites Resiliency and Storm preparedness as a Community Benefit, but it is not. It is a Requirement and makes good business sense, but provides no true benefit to this community.

The developer claims that there will be no adverse public health issues, but **that is not true**. The Rockaways and Five Towns now have only one hospital where before the closing of Peninsula Hospital there were two. And the traffic problems caused by this development will add significant, and perhaps deadly, travel times for trips to St. John's Hospital from areas west of the project.

Again, the developer claims that there will be no significant impact on the neighborhood by a development two times as high, many times denser, with no parks, playgrounds, or greenspace, or significant parking. **That is not true**.

Unfortunately, what is NOT being said is there is currently a pending lawsuit in Federal Court regarding the issue of community preference housing AND Rockaway residents are still being misled and promised that they will get community preference when it comes time for tenant selection.

Arker claims that they are bringing the first supermarket to the neighborhood. What about the Pioneer supermarket on Beach Channel Drive at Beach 58th Street? And what about the range of stores in the neighborhood that have closed over the years? Stores close because the area income can't support them. Arker does nothing to address the problem.

The Arker Companies only has a right to build 568 units of housing BUT wants to build 2,200 units. In order to be acceptable, the project must provide a minimum of 568 units for middle income families and the total number of apartments should be limited to no more than 1,000.

In the past, Community Board 14 has stated that if any more affordable housing were built in the Rockaways that it be Affordable Homeownership although a preference was for market rate housing. So what does the Arker Companies development plan come to the community with? A plan to increase housing density by almost 300% and provide NO homeownership and only 13% of the units for moderate income and NO Middle Income units.

Just as we have been saying all along, we want affordable housing homeownership to be a part of the Peninsula Hospital site redevelopment.

Affordable housing developments in other areas of the city have better access to jobs, schools, transportation, and opportunities. None of them has the density of this proposed plan.

Growth and change can be a good thing as long as this current plan is changed to REALLY Benefit the community.

If they want community support we Need MORE REAL BENEFITS FOR OUR COMMUNITY.

Summary of Responses to Specific Chapters

Chapter 1: Project Description

The developer (correctly) observes that unemployment in Community District 14 is about 1.5% higher than the overall rate in Queens and argues that adding 4,000 essentially unemployed residents and 365 new jobs will help the situation. We don't understand how.

The developer also claims that the project is intended to fit into the neighborhood by building 2,200 apartments in buildings up to nineteen stories high on less than ten acres and no open spaces other than streets, sidewalks, and parking compared to an adjacent NYCHA projects of seven to nine story buildings on large, grass filled lots. Again, we don't understand how this fits into the neighborhood. And never mind that on the eastern edge of the project is an area on one and two family homes.

To further add insult to injury, the developer argues that it is city policy to build as many apartments as possible on any open land, and that density is necessary for the success of the proposed stores. This argument offers no analysis as to why the project should be limited to 2,200 apartments rather than perhaps 4,000 or even 6,000 apartments. We believe that the relevant city policy is expressed in HPD's *Resilient Edgemere* study which recommended only one or two family housing, retail stores, and parks on vacant Edgemere land. The population density is excessive for Rockaway. It is similar to midtown Manhattan.

Further, developer wishes to build 2,200 "mixed income" rental apartments for police officers, fire fighters, and teachers where 568 apartments are allowed under the current zoning but in actual fact only 13% of the apartments might be available to working families based on the developer's plans (see detailed analysis in the body of this document).

The following table is the definition of the various income bands:

<u>Income Band</u>	<u>Percent of AMI</u>	<u>Dollar Range</u>
Extremely Low-Income	0-30%	\$0 - 28,830
Very Low-Income	31-50%	\$28,831 - 48,050
Low-Income	51-80%	\$48,051 - 76,880
Family of 3 AMI	100%	\$96,100
Moderate-Income	81-120%	\$76,881 - 115,320
Middle-Income.....	120-165%	\$115,320- 158,565

A couple making the minimum wage (\$15/hour) would have an income of roughly \$60,000 per years. Police officers, firefighters, and teachers typically individually have salaries of \$80,000 or more after five years so a couple would not be eligible, contrary to the developer's arguments.

Contrary to the developer's statement, this is not a mixed income development.

The project does not support home ownership which we believe is important to stabilize the neighborhood.

The addition of more jobless residents plus few jobs than new residents does not improve the employment rate.

The project would have the greatest housing density on Rockaway. The only place in New York City that is comparable would be Manhattan and some parts of the Bronx. People come to Rockaway to get away from Manhattan density.

The developer's proposal would overwhelm already failing elementary and middle schools, overwhelm child care, and add to Queens' high school woes.

The proposed project would add more publicly funded low income residents to the community board that already has the most publicly funded apartments, the worst transportation, and the fewest resources in the borough.

Chapter 2: Land Use, Zoning, and Public Policy

This project, if approved, would be perhaps the clearest violation of the United States Fair Housing Act of 1968 ([42 U.S.C. § 3601 et seq](#)), that can be imagined. Clearly it would meet the “disparate impact” test set by the Court in 2015 (*Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S. Ct. 2507 (2015)) but it would also meet the arguments presented by Justice Thomas' in his dissent in as much as direct testimony before the commission argued in favor of a segregated project (Rev. Gray and Milan Taylor).

The City of New York, acting through the Planning Commission, may not lawfully permit this project.

We believe that the effect of the proposed public housing project as proposed on the surrounding area will be devastating on the property values of the one and two family homes to the east of the project. In addition, the project will have a negative impact on the entire Rockaway peninsula due to its effect on traffic, emergency response times, schools, child care, character of the neighborhood, and racial integration.

This project will continue a process begun under Robert Moses of withdrawing supporting services and sending the city's poor to Rockaway, a relatively small area (population under 100,000) that already has half of Queens' publicly funded apartments. It is immoral, anti-social,

and unlawful. The fact that African-American speakers at the public hearing spoke in favor of it provides no justification.

The developer's proposal is directly contrary to the city's recent study of the area, *Resilient Edgemere*, which concluded that available land in the area should only be used for one of three purposes: stores, parkland, and one or two family housing.

A basic principal of zoning is that new construction should be in the context of the neighborhood. This project is not. It consists of nineteen story buildings in a concrete pad with no lawns or significant vegetation in an area with some of the worst transportation in the city but no allowance for an adequate number of cars.

Contrary to the developer's statements, this is not a mixed income project. Only 13% of the apartments would be available to moderate income families and none to middle income ones. The developer, in its community presentations, has said that police officers, fire fighters, and teachers are the intended residents but a two earner family with five years on the job would not be eligible for any of the apartments.

Finally, the developer argues that open space is a bad thing and that as many apartments as possible should be built on any available lot. Carried to its extreme, Central Park should be filled with apartments and the Planning Commission should be eliminated since the number of apartments to be built should merely be an engineering question. We disagree and believe that the Commission also disagrees.

Chapter 3 Socioeconomic Conditions

The developer proposes:

- To more than double the area population from 6,848 to 14,545 people.
- Increase the area's publicly funded apartments by over 50%.
- Build a "mixed income" project where almost no apartments are available to moderate income families and no apartments at all are available to middle income families.
- Build a project for police, firefighters and teachers where a couple working for these agencies will not be eligible for an apartment if they have five years on the job.
- To be concerned with gentrification when virtually 100% of the area dwelling units are publicly funded or owner occupied (280 out of 4,908).

The developer claims that building housing for its own sake is a public good. We don't believe that is the case. Housing, particularly when built with public funds as this project will be, must serve the overall community. It must contain a true mix of income levels, including moderate and middle income as well as market rate. It must provide for ownership. And it must not overwhelm the community.

If we accept the developer's reasoning, there is no reason to limit this project to nineteen stories. Why not fifty or 100 stories? Indeed, why not build in Central Park?

Housing must fit into the neighborhood in terms of scale and amenities. This project does not. It would grossly alter the character of the neighborhood in terms of size, scale, effect on transportation throughout the Rockaways, and deal a punishing blow to an already suffering educational environment.

Chapter 4: Community Facilities and Services (Schools, Libraries, Day Care)

The proposed project would have a very serious effect on day care, elementary, middle, and high schools. The developer's own analysis plainly states that there will be inadequate day care seats and a total shortage of 2,000 elementary and middle school seats. The only reason that there will not be a shortage of high school seats is they are measured on a borough rather than district basis. Of course, with our wonderful Queens transportation, it's no problem at all for children to travel to Long Island City or Bayside for high school.

Again, the developer claims that the adverse impact on the Arverne library is not a problem because, with our wonderful transportation, residents can use other libraries. The developer never mentions, since so many of the residents will be extremely low income, if free MetroCards will be provided for these trips.

We believe that the project may have a serious effect on medical care and other emergency responses in addition to the other problems.

Chapter 5: Open Space

The developer notes that there would be a significant deficit in open space if the project is built (16%) but wishes to claim the open space on the beach which is closed due to the Piping Plover and thus not useable for the public. Similarly, the developer wants to count other spaces not available to the public as available open space including the Rockaway Youth Task Force Garden, the Farm Rockaway and the Edgemere Urban Renewal Park community gardens.

More significantly, the project is designed to be covered with asphalt and cement. There are no grass areas at all. Yes, there will be some street trees, but that is a normal part of the city landscape – not a gift from the developer.

Indeed, the developer says that they will “reopen” Beach 52 Street at the Freeway – but it has never been open since the Freeway was built. **Another untrue statement.**

The project design may be appropriate for midtown Manhattan, but not for Rockaway. People move to Rockaway because of the open spaces, not despite them.

Chapter 6: Shadows

The developer contends that shadows are not a problem since they don't fall on public parks, yet the developer's own documentation shows that these huge nineteen story buildings will put people and apartments in the NYCHA facilities and PS 105 in substantial shadows. Contrary to the CEQR Technical Manual, we believe that this is a problem in Rockaway. It is not Manhattan where everyone expects shadows all day long.

Chapter 7: Historic and Cultural Resources

We have no issues with the historic and cultural analysis.

Chapter 8: Urban Design and Visual Resources

The developer claims that the project is in character with the surrounding buildings but that is **simply untrue**. Of all the buildings within a mile of the project, only two are over twelve stories tall. The developer says that the project will gradually reduce the building height from nineteen stories, but on a single block, there can be no such thing as a gradual height reduction. That is like saying that the height of the Empire State building gradually reduces to the adjoining buildings because of the setbacks. It is an absurd statement.

Another absurd statement is that the "superblock" would be broken up by the addition of a new street. Any construction would have to do this so they are not doing anyone special favors. And their contention that they will reopen Beach 52 Street across the Freeway is **yet another lie**. There are only limited crossings of the Freeway as there have been since it was built, and since the LIRR ran at ground level. Beach 52 Street has never crossed the tracks so it cannot be "reopened."

Chapter 9: Hazardous Materials

We are concerned that the examination of the site for hazardous materials does not appear to have included a search for radioactive material despite the fact that the hospital used a variety of radio isotopes for diagnosis and treatment over the years.

We do not believe that the study should be accepted as complete.

Chapter 10: Water and Sewer Infrastructure

We are concerned that because the project proposes to raise the land in the project area it will displace rainwater onto surrounding properties. We feel that there is not adequate consideration of this possibility.

Chapter 11: Solid Waste and Sanitation Services

We have no issues with the solid waste analysis.

Chapter 12: Transportation

We believe that the methodology of the analysis is fatally flawed. Rockaway is a resort area with significantly different traffic patterns in the summer vs. winter. The analysis appears to be based on winter traffic which is significantly lighter.

The developer proposes “reopening” Beach 52nd Street through the Freeway even though it was never open and the developer knows or should know that NYC DOT is unlikely to agree to this.

The proposed parking spaces are grossly inadequate. Even twice as many parking spaces would be inadequate in Rockaway where anyone who can scrape the money together has a car and often two cars. Rockaway is a transit desert where we believe 110% parking should be provided.

The developer admits that even with the very few parking spaces that they are providing there will be serious adverse impacts on traffic flow throughout the Rockaway Peninsula even if the NYC DOT implements every one of their suggestions.

There is no analysis of the effect of the increased traffic on emergency services or air pollution.

The “A” train is frequently standing room only when it leaves Beach 60th Street, but the developer doesn’t see any problems with this service.

The developer admits that bus service would be affected but ignores the effect on traffic of adding additional buses.

The developer fails to analyze the effect of increased pedestrian traffic (and jaywalking) on the vehicular traffic.

Chapter 13: Air Quality

We believe that the Air Quality analysis is deficient in several respects.

We believe that it is clear that car ownership will far exceed the developer's proposed 35% – probably it will be in the neighborhood of 85% to 110 % with a concomitant increase in air pollution.

In addition, the developer ignores the pollution that will result from traffic congestion and the adjacent MTA bus depot and repair facility. And the developer mentions a nearby NYCHA unit that provides heat for a million sf. of apartments in 31 buildings but concludes that since it has no permits it must not generate any pollution!

Finally, the developer claims that there will be no pollution from the PTAC HVAC units because no fossil fuel is consumed in their operation, ignoring the fact that fossil fuel will be consumed in generating electricity for their operation, possibly at the nearby National Grid Far Rockaway Generating Station.

Chapter 14: Greenhouse Gas Emissions and Climate Change

The developer only accounts for the on-site consumption of natural gas for heating stores, medical offices, etc. and perhaps common areas assuming that the apartment “energy-efficient package terminal air conditioning” units use no energy. But, of course they do use energy. The fact that the fuel is burned off site is irrelevant to its consumption. Today, generating additional electricity burns natural gas, a fossil fuel.

The developer's arguments that the project is well served by public transit are specious at best. Rockaway is a transit desert. It is said that people have died of old age waiting to get somewhere on the Q 22 or Q 52 bus. This is discussed in greater detail in the main Chapter 14.

Particularly relevant is the chapter's conclusion that there is little reason to believe that the true impact of the project would be a real reduction of greenhouse gas emission overall.

Chapter 15: Noise

While we do not have any significant issues with the developer's analysis of noise levels, we are concerned that the combination of wall / window sealing and sealed PTAC units does not allow for adequate ventilation. In a sealed box, human beings consume oxygen and expel carbon dioxide and water. The discussion does not discuss a means of ventilation.

Chapter 16: Public Health

We believe that there will be significant public health effects as a result of increased traffic congestion.

This will be due to air pollution from traffic congestion and worse response from the city's emergency services (NYPD, FDNY, and EMS).

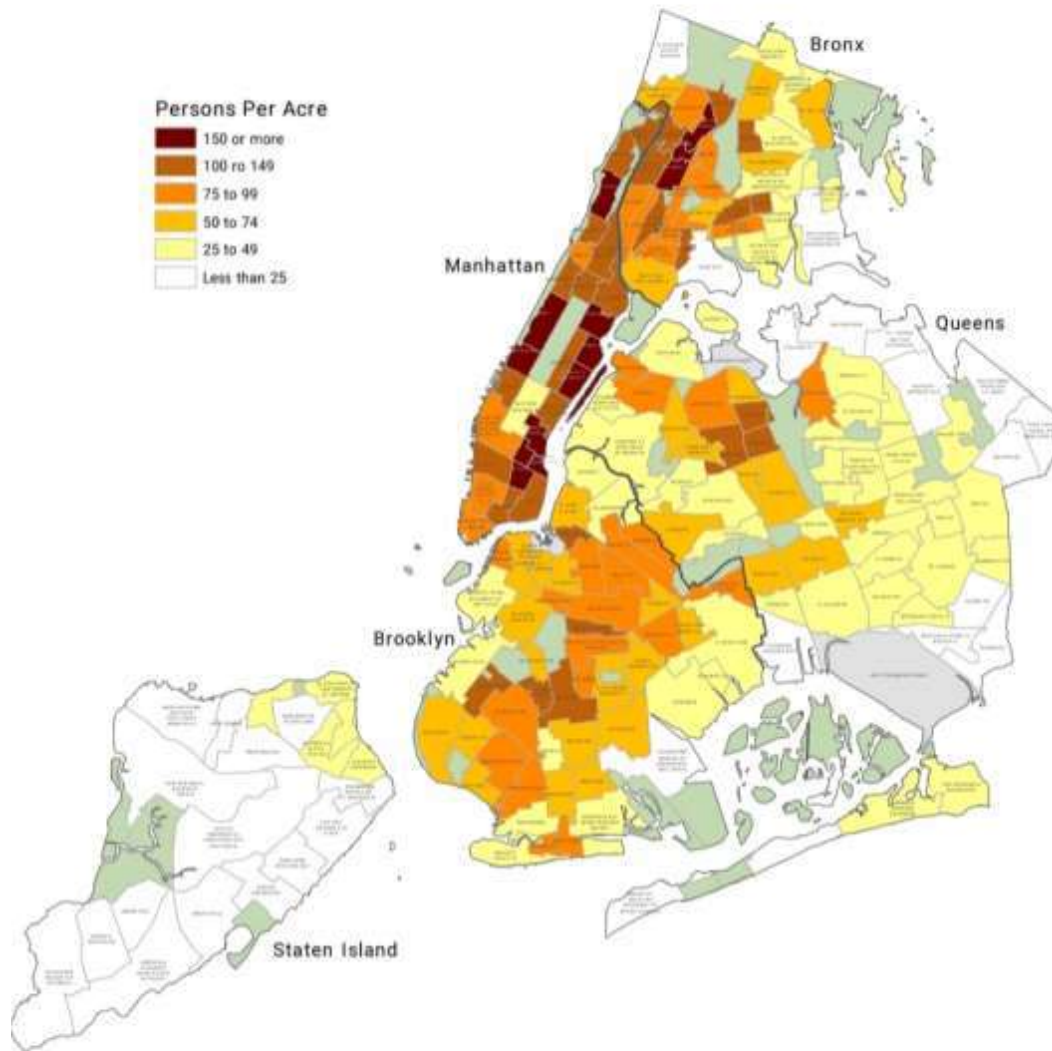
Chapter 17: Neighborhood Character

There are a number of items to consider here.

Perhaps most significant is the fact that the project appears to be designed as a challenge to the Fair Housing Act of 1968 and the Supreme Court's holding in 2015 that it is unlawful to build projects that would accentuate any form of segregation. This project would do exactly that.

The project certainly would not be in character with the neighborhood in terms of height, open space, grass area, or density. The developer proposes 2,200 apartments housing 6-7,000 people on roughly 10 acres of land. That is a density of 600 people per acre. In terms of density, it would be most like Manhattan, the only borough that has similar density as shown by the map below,

PL-P2 NTA: Population Density by Neighborhood Tabulation Area*
New York City, 2010



*Neighborhood Tabulation Areas or NTAs, are aggregations of census tracts that are subsets of New York City's 55 Public Use Microdata Areas (PUMAs). Primarily due to these constraints, NTA boundaries and their associated names may not definitively represent neighborhoods.

Source: U.S. Census Bureau, 2000 and 2010 Census Public Law 94-171 Files
Population Division - New York City Department of City Planning



Figure 3 - People per acre (NYC Department fo City Planning)

Chapter 18: Construction

We believe that the developer's consideration of the impact of construction is grossly inadequate in two regards.

First of all, there is no consideration of the impact of pile driving noise on vulnerable populations, particularly students at PS 105 and the nursing homes.

And there is no consideration of routing construction vehicles away from PS 105 when children are entering and leaving.

Chapter 19: Alternatives

This is the most relevant chapter of the DEIS. The HPD *Resilient Edgemere* report recommends mostly one and two family houses and stores for Edgemere. We believe that would be one of the most appropriate uses of the site but we would not object to the developer's constructing 568 apartments as of right. Nor would we object to any request for a zoning change to permit additional stores. We believe that the best use of this land would be to construct at least one elementary school.

On the other hand the developer argues that if market rate housing is built on this site "the potential to introduce a trend or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population . . . [exists]. . ." This is an outright lie since virtually all of the existing housing in the area is either publicly owned or subject to a variety of income restrictions. Thus gentrification is just not possible in Edgemere.

The developer continues that the goal is to build as many apartments as possible for the lowest income residents on any open land. And implicitly, the developer says to hell with everyone else. We believe that housing is necessary for people with a range of incomes and a community requires a range of services and facilities.

Chapter 20: Mitigation

The developer admits that the project would have serious deleterious effects on community resources including pre-school, elementary, middle and high schools as well as libraries. Parks and open space would be a problem as would noise. The transportation issues including parking, traffic, buses, subways are too numerous to mention. And they extend from downtown Far Rockaway to Beach 116 Street.

The developer has no serious methods mitigating any of these problems. The best suggestion offered is to retime traffic signals in violation of the law (NYS Vehicle and Traffic Law, §1680)!

Chapter 21: Unavoidable Adverse Impacts

The developer admits that the project will have unavoidable, and we believe unacceptable, adverse impacts on childcare, elementary, middle, high schools, and libraries in the area.

The project will have a negative impact on parks and open spaces.

The project's impact on transportation would be just awful. Even if the developer is granted the right to only have parking for 35% of the apartments, traffic from one end of the Rockaways to the other will be impacted. The developer proposes eliminating parking at various locations from Far Rockaway to Beach 116 Street. Emergency vehicles passing the project will be delayed. Busses will be over capacity. People from the Rockaway Park will never get a seat on the "A" train when they transfer at Broad Channel. There will be pedestrian traffic jams in the project's vicinity. Altogether a range of horrible transportation problems will result from the developer's proposals by the developer's own admission.

The project will create a range of noise and construction issues and possibly make education at PS 105 impossible for the ten years of construction.

In summary, the developer proposes to convert a quiet, seaside community into a replica of the worst of Manhattan. We don't think that is a desirable outcome.

Chapter 22: Growth-Inducing Aspects of the Proposed Project

We agree with the developer that the project would not generate any additional growth beyond the project boundary in view of the fact that virtually all available land is occupied by various government agencies including the NYCHA, MTA, and FDNY.

Chapter 23: Irreversible and Irrecoverable Commitments of Resources

The developer makes a number of statements in this chapter that don't appear to have anything to do with commitments of resources but appear to be a summation of their arguments for the project.

The developer argues that the population of the Rockaways is increasing and therefore this project should be built to further increase it. The argument only leaves us confused.

Likewise, the developer points out that families in the Rockaways, like most people in the city, are rent burdened. True, but not relevant to the project's merits. And the developer refuses to provide significant help for moderate and middle income families

The developer continues that there are senior citizens in Rockaway. Of course there are senior citizens throughout the city. Again, a true statement but what of it? One of the authors of this paper is a senior citizen, but he certainly does not need subsidized housing.

The developer's most outrageous, and untruthful, argument is that the project will provide 2,200 apartments for household up to 80% of the AMI suggesting that the project would provide a substantial number of apartments for those at 80% of the AMI but most of the apartments are for those far, far below the 80% AMI. In fact, the apartments are overwhelmingly for those at half of that level or less. The developer says that there will be apartments for police, fire fighters and teachers but NYPD, FDNY, or teacher couples will not be eligible if they have as little as five years on the job.

The plain fact is that this is just another attempt to dump the poorest of the city's poor on Rockaway. We firmly believe that all people deserve decent housing but the time is past where the least affluent and most troubled are sent to the Rockaways where there are few jobs, few services and the better off population is kept elsewhere. Indeed, working couples making slightly more than the minimum wage will not be eligible for these apartments!

Rockaway, and Edgemere in particular, needs more people who have a bit of disposable income to support stores and services so desperately needs by residents. The HPD *Resilient Edgemere* report stated this as clearly as possible,

Rockaway has a dearth of infrastructure, public facilities and amenities. And an excess of low income housing, nursing homes, and adult care facilities.

Chapter 1: Project Description

An excerpt from the developer's Draft Environmental Impact Statement, 1-22, 23 seems like a good place to start this chapter:

The Queens CD 14 Statement of Community Needs identifies the high rate of unemployment in Queens CD 14 as a pressing concern. Approximately 10.2% of the civilian labor force in Queens CD 14 is unemployed, compared to only 8.6% in Queens and 9.5% in NYC3. The Proposed Project would introduce local retail and medical office space, which would generate approximately 365 new permanent jobs on the Project Site.

In addition, the overall scale of the Proposed Project is intended to fit into the context of the nearby development. The NYCHA Ocean Bay Apartments (Bayside) are located directly north of the Project Site and include 24 buildings that range in height between seven and nine-stories. The Ocean Bay Apartments (Oceanside) are located one block west of the Project Site and contain seven buildings with heights of seven- to nine-stories. The Arverne View apartment complex is located approximately four blocks southwest of the Project Site and provides 1,100 DUs across 11 buildings, which range in height from four to 19 stories. The Proposed Project would consist of 11 buildings that would range in height between 8 and 19 stories.

The proposed increase in density is supportive of the City's goal to redevelop vacant and underutilized land to provide affordable housing. The Proposed Project would allow for the redevelopment of the unused land once occupied by the Peninsula Hospital with affordable housing. The rezoning of the Project Site to both C4-4 and C4-3A districts in conjunction with a zoning text change to provide MIH would result in permanently affordable housing on the Project Site. Under the anticipated MIH designation of Option 1, the Proposed Project would be required to develop 25% of its residential floor area as permanently affordable housing units (approximately 550 units) averaging 60% of the Area Median Income (AMI), with no unit targeted at a level exceeding 130% AMI. Furthermore, as stated previously, the Proposed Project intends to provide additional affordable housing by restricting a total of 1,927 of its approximately 2,200 DUs to households with incomes up to 80% of AMI.

We believe that the developer's premises are fundamentally flawed and violate the law.

This project is a publicly financed low income housing project to be operated for private profit. This chapter addresses a number of significant matters that the developer managed to ignore in its submission. These include the lack of education facilities, the lack of income to support retail establishments, the fact that retail establishments that have been opened in the area have repeatedly failed, and the overall character of the development vis a vis the neighborhood.

The developer wishes to build 2,200 “mixed income” rental apartments for police officers, fire fighters, and teachers where 568 apartments are allowed under the current zoning. In addition, the developer wishes to construct stores for the community (which we support) and medical offices (in close proximity to the Addabbo medical facility which is currently doubling its size). The developer wants to provide parking for only 35% of the residents vs. 85% required under the zoning rules, and finally, the developer says that the Beach 52nd street at Rockaway Freeway entrance will be “reopened” from where it now terminates at Rockaway Beach Boulevard. In fact, Beach 52nd Street now terminates at Edgemere Avenue, not Rockaway Beach Boulevard as it always has, since the LIRR tracks were laid at street level and as it has when the Freeway was built.

The developer does not want to provide yards, compliant setbacks, or required parking. And what parking the developer does provide has not been indicated if it will be free or at a charge. All of the proposed zoning changes (other than retail) would have serious negative consequences for the local community and the Rockaways as a whole.

Income levels

This Peninsula Hospital Site Development plan is being sold by the Arker companies and local elected officials as a MIXED Income affordable housing development. **That is not true.**

The following table is the definition of the various income bands:

<u>Income Band</u>	<u>Percent of AMI</u>	<u>Dollar Range</u>
Extremely Low-Income	0-30%	\$0 - 28,830
Very Low-Income	31-50%	\$28,831 - 48,050
Low-Income	51-80%	\$48,051 - 76,880
Family of 3 AMI	100%	\$96,100
Moderate-Income	81-120%	\$76,881 - 115,320
Middle-Income.....	120-165%	\$115,320- 158,565

The Area Median Income (AMI) is \$96,100 for a family of three.

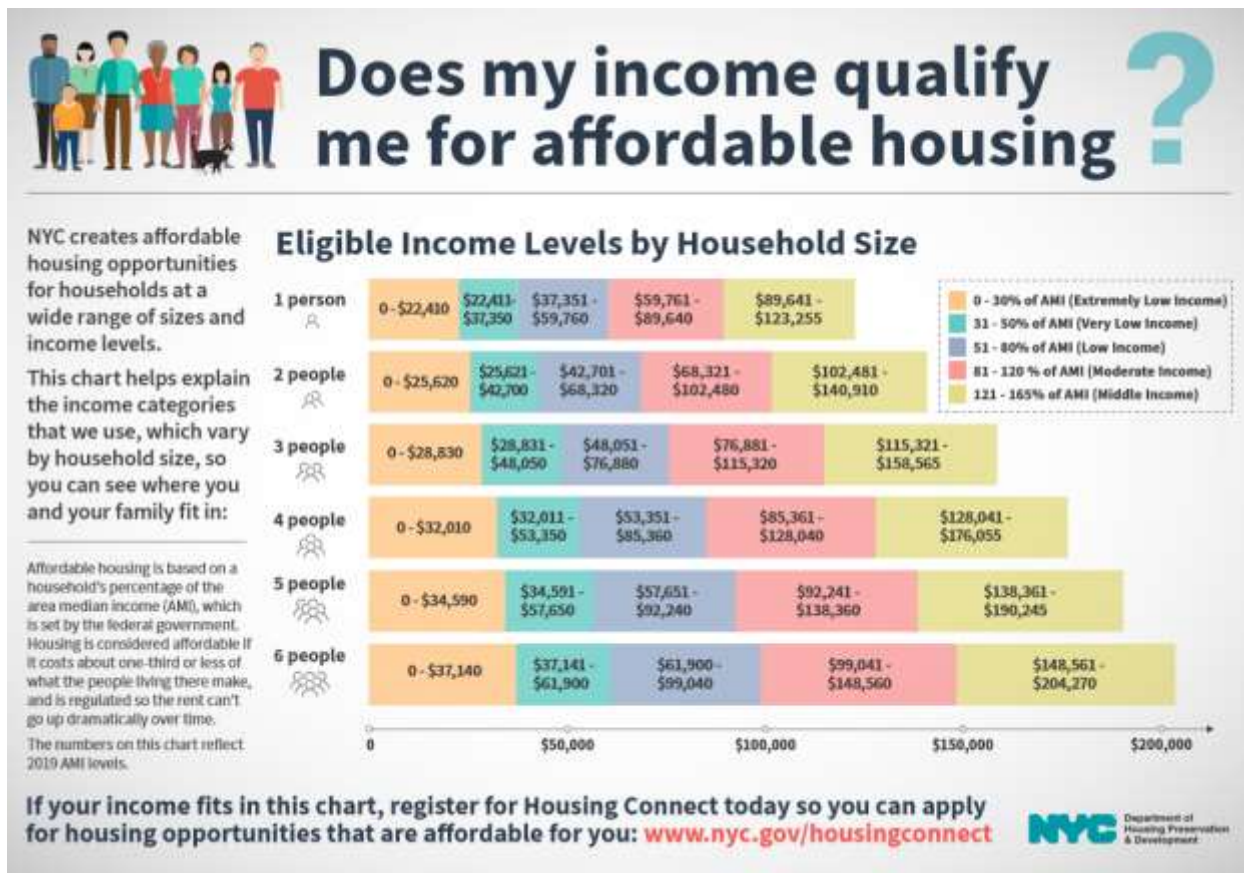


Figure 4 - Eligible Income Levels by Household Size (NYC)

<https://www1.nyc.gov/assets/hpd/downloads/pdf/renter-resources/affordable-housing-income-eligibility.pdf>

It is clear that there will be NO units available for middle income families and only 13% will be for moderate income families. This will be a publicly financed, privately owned low to extremely low income housing project, just like all of the other Rockaway projects.

That is, a household with two working adults making a little over minimum wage will barely qualify for 13% of the moderate income units. There is a real need to better balance incomes in this development to give current locals an opportunity.

Look at chart and see a few scenarios to show you who qualifies for only **13%** of the apartments:

1. A husband making \$35,000 a year and a wife making \$35,000 a year would ONLY qualify for those very small number of moderate income units.
2. A husband making \$40,000 a year and a wife making \$40,000 a year and they have one small child would ONLY qualify for those very small number of moderate income units.
3. A husband makes \$60,000 a year and the wife makes \$26,000 a year and they have two small children they would ONLY qualify for those very small number of moderate income units.
4. A working couple each make a little over minimum wage, \$16.50 hr. would only qualify for 13% of the units.

5. Single mother MTA worker makes \$60K a year lives with her infant son and mother who collects \$1,500 a month in social security would only qualify for 13% of the units.
6. Married couple police officer and teacher both with 3.5 years employed and have two children might only qualify for 13% of the units.

Arker and Donovan Richards say that this is for cops and firefighters. They use the starting salary as an example. But in real life, after 5 years, what is a police officer's pay? More like \$80,000. So a married couple, both NYPD officers, is not eligible for an apartment at all! Same for most two earner city employees.

As planned, the project will only create further concentrate poverty and continue the economic and racial divide that has plagued the Rockaways for decades.

Of the planned 2,200 units ONLY 273 units (LESS THAN 15%) of the units will be for moderate income families making more than 80% AMI. Middle income families will not be eligible for any of the apartments

These working families desperately need affordable housing too and are often forgotten about. CHANGE THE PLAN to ensure MORE affordable housing units are available to moderate and middle income residents. It will better balance the income in the neighborhood and allow economic development and create permanent affordable housing.

Wealthy and upper middle class families make enough money and don't need rental assistance. Many working poor and those less fortunate receive some type of rental or other subsidies to make life easier so they can survive. However, what about the forgotten moderate and middle income families who can barely pay their rents and also make too much money to receive any type of rental subsidy? Why does the current Peninsula plan only have 13% of the units for the forgotten Moderate Income families and NO units for middle income families? A balance of income requirements is important to any new development giving ALL people who need it a hand up and is vital to the long term stability of the community and its CURRENT residents.

Of the planned 2,200 units ONLY 273 units (LESS THAN 15%) of the units will be for moderate income families. None would be for middle income families, The rest will be for Low Income, Very Low Income and Extremely Low Income as per a chart put out by NYC. This proposal is NOT a Mixed Development, **they are lying** to the Rockaway Community. Moderate and Middle Income working families desperately need affordable housing too and are being forgotten about.

The subject area in the Rockaways already has some of the most reasonable rents not only in Queens, but also in New York City. The chart below shows that the Rockaways is NOT experiencing major losses of unsubsidized housing and of the 4,908 units of housing in the study area 4,107 (84%) are publicly funded and not subject to large rent increases or gentrification.

MAP 2: MAJOR LOSSES OF UNSUBSIDIZED LOW-RENT APARTMENTS SINCE 2011

Percentage point difference
2011-2017

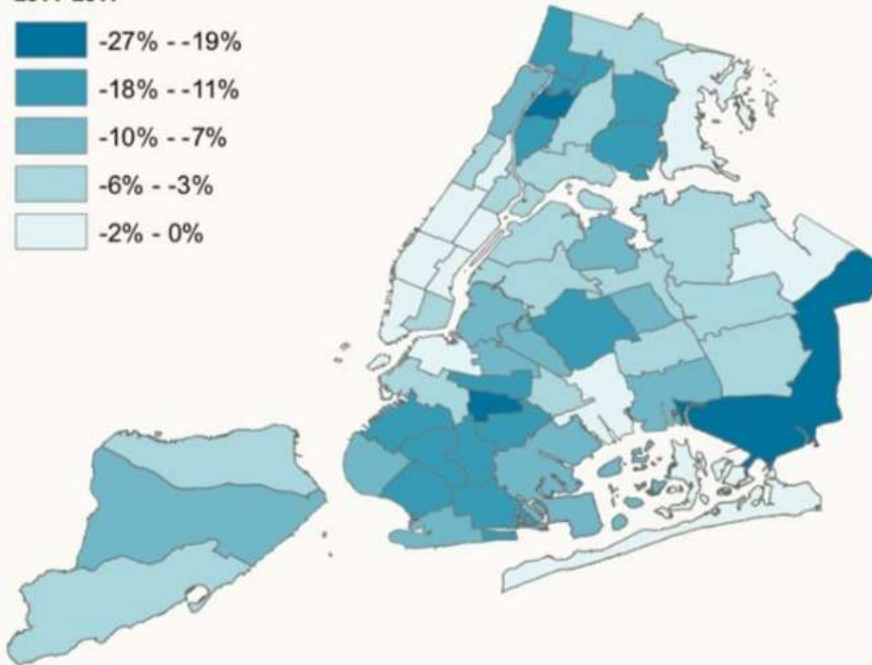
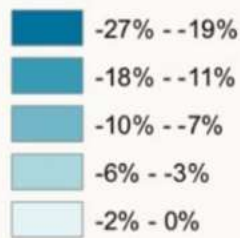


Figure 5 - CityLimits.org: Major losses of low rent apartments since 2011

CityLimits.org: Chart showing loss of low rent apartments since 2011

The proposed Peninsula Hospital plan would be the largest 100% Affordable Housing Development in the city.

There is nothing wrong with affordable housing when designed and implemented properly. There are, among the opponents, people who have lived in affordable housing and have many family and friends that live in affordable housing and understand its benefits. However the Peninsula Hospital plan does NOT balance incomes and further creates concentrated poverty instead of being a TRUE mixed income development. Under the CURRENT Plan there will be NO Units for middle income and only 13% for moderate income.

Incomes

Homeownership:

This development does not provide any opportunity for affordable home ownership which is desperately needed because the area is saturated with rental units. Home ownership would provide stability to the area.

Balance of Incomes:

The current plan is only calling for 13% of the units to be for moderate-income families. How are you supposed to build a sustainable community when you need people who have disposable income as well and only 13% are being offered to moderate-income families. The current plan is for 87% of the units to be for extremely low, very low and low income. Yes we understand there are many people out there who are underprivileged and we need to be able to have housing alternatives for them. However a failure to balance incomes properly will only further create and perpetuate concentrated poverty and economically and racially segregate our community.

Jobs:

This development when complete will provide around 250 to 300 jobs in an area with some of the highest unemployment rates in New York City. How will adding 7,000+ NEW underprivileged residents help this ratio??

There are so many other reasons as well for this plan to be changed we could go on forever but these are the main topics.

This Peninsula Hospital Site Development plan is being sold by the Arker companies and local elected officials as a MIXED Income affordable housing development when **it is not true**. The developer states it's a mixed income development when ONLY 13% are for moderate income families AND there are NO middle income units.

The developer has stated that it will create 600 jobs, when Environmental Impact Statement states around 300. Either way how many of those jobs will be guaranteed for residents of Edgemere / Arverne and the rest of the Rockaways?

A new supermarket and retail space is a good thing, however the Community needs more economic opportunity for CURRENT residents because in 15 years this development will only have created about 300 permanent local jobs when complete for 7,500+ New Residents.

They mention hundreds of construction jobs? How many will be local and how many local residents that need economic opportunity have the training and skill to do those jobs? Will the builder provide training?

It's a slap in the face to the Community Board and local residents that the Arker Companies wants to build only 13% for moderate income families and parking for only 35% of the proposed units.

Density

The project would build 2,200 units of housing and add 7,000+ new residents on only 9.34 acres. This is similar in size to Ocean Bay Apartments AND Arverne View Houses combined on a fraction of the land. It is too many people for this community that lacks the resources.

In the Draft Environmental Impact Statement EIS Chapter 4 page 4-5 claims that the proposed project would NOT result in the creation of a sizeable new neighborhood where none existed before. Therefore a detailed analysis of indirect effects on health care facilities is not warranted.

Since when is 6,500+ NEW residents not considered sizable?

Isn't doubling the area population sizable?

Is a 50% increase in the zip code population sizable?

Many local residents and civic leaders across the Rockaways have discussed this density issue being a problem with the new development and that was before they even knew about the current and future developments on the Peninsula which will add thousands of more units and close to 15,000 more residents

- Arverne by the Sea Tides Section will add approximately 750 Units 2,500 new residents
- Downtown Far Rockaway Village will add approximately 5,000+ new residents
- Arverne East which will bring approximately another 4,500+ residents.

The developer is financing this project through a variety of public funding yet has chosen not to use M2 funding to bring in a significant number of moderate and middle income families. The developer appears to be prejudiced against the middle class.

Here's an interesting fact. The 2018 report from the U.S. Census Bureau states the population of 11692 (this site's zip code) is 20,242 for the entire zip code; this development is adding an addition 7,000+ to that! That's nearly a 35% increase in population. Where are the schools, police / fire protection, road and sanitary and utility improvements? This project increases the overall Rockaway Peninsula population by nearly 5.5%.

The Arker Companies and local politicians say they need density to make the development work. The fact is that there is already a very significant density in the project area. The problem is that there is not sufficient income to support stores and amenities. And this project, with its overwhelming bias toward low and extremely low income will not address this issue. The true reason for this extreme density is to line the developer's pockets and the pockets of the politicians they donate money to.

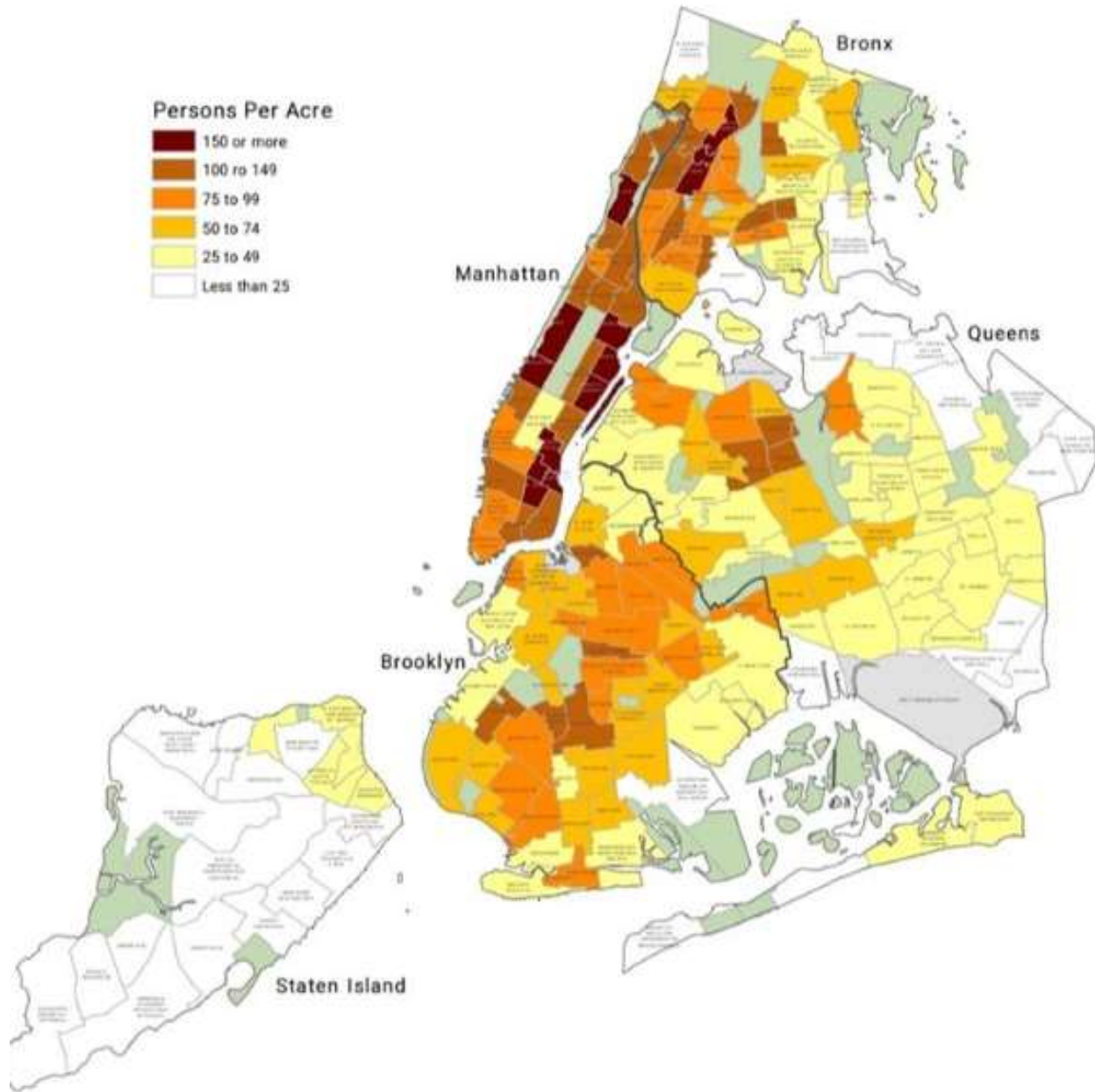
Here is a density analysis of the entire city showing how many people live per acre.

As you can see most of the city's density is 50-99 people per acre.

So just doing a quick analysis of the proposed with action plan to build 2,200 units of housing with 7,000 new people on 9.34 acres of land yeilds a density of 749 people per acre – which is off the charts.

Cramming that many vulnerable people into an isolated beach community that lacks good paying jobs, adequate transportation and has overcrowded and underperforming schools is a recipe for disaster.

PL-P2 NTA: Population Density by Neighborhood Tabulation Area*
 New York City, 2010



*Neighborhood Tabulation Areas or NTAs, are aggregations of census tracts that are subsets of New York City's 55 Public Use Microdata Areas (PUMAs). Primarily due to these constraints, NTA boundaries and their associated names may not definitively represent neighborhoods.

Source: U.S. Census Bureau, 2000 and 2010 Census Public Law 94-171 Files
 Population Division - New York City Department of City Planning



Figure 6 - People per Acre (NYC Department of City Planning)

They are projecting a community three times the size of Broad Channel but the developer claims that the proposed project:

- Would not result in any direct effects on either police or fire services.
- Would not not create a sizeable new neighborhood where none existed before.
- Would overwhelm existing elementary schools but that is not their problem.
- And therefore, no further analysis is warranted!'

The Arker company is looking for approval to put 2,200 units of housing on the former Peninsula hospital site when they only have an "As of Right" to build 568.

- How many units of housing would be appropriate for the site?
- No New Housing, area to dense.
- 568 units "As of Right"
- 2,200 units, with approval
- 1,136 units, with approval
- 1,500 with Option 2 under MIH

So, the Arker company states they need the density to support the retail development. That's funny because other developments they have built across the city don't have close to 2,200 units and the retail works just fine. Besides the area is already has density in place.

- 1,395 units in Ocean Bay Houses, 1,093 units Arverne View
- 712 units B41 St Houses
- 342 units Nordeck Buildings.

These are just some of the units with a total of around 5,000 dwelling units and about 14,000 residents. That's density!

Now they want approval to bring in 2,200 more units of housing without providing a new school or real job opportunities for current residents.

When asked how they intended to evacuate the thousands of residents in their buildings when there is another emergency such as Sandy and the Transit Authority has shut down service in The Rockaways, their answer was "we'll supply buses." No answer where they would get them, or drivers. "Trust us."

So here is the Arker company's website. All nice and fancy with some good info about the project, <https://comingtoedgemere2020.com/>

However one big problem. They left out important information and other information is misleading.

1. The development will bring over 1,500 school age children and NO new school while the closest school, PS/IS 105, is at 112% capacity. WE MUST HAVE A NEW SCHOOL.

2. They state it is Mixed Income project but **that is not true**. Only 13% of the units will be for moderate income families and there will be no middle income units. **MUST HAVE TRUE BALANCE OF INCOME.**
3. This project will become the highest density population in the Peninsula and 19 story buildings will dwarf residents of NYCHA Ocean Bay Houses. **NEED LESS DENSITY TO NOT PUT STRAIN ON CURRENT RESIDENTS.**
4. They state there is no need for additional parking **BUT** they will have parking for **ONLY** 35% of the apartments. The zoning requirement of 85% of the residential units is a minimum. We believe that 110% is more appropriate. **RESIDENTS NEED MORE PARKING.**
5. They state there will be good paying jobs, but when project is complete in 2034 (15 years) will only create about 300 minimum wage jobs for 6,500+ new residents.

Other

Coangelo who has always been a friend of the Rockaways.

But notice the info they give the news is still different than what's in the Environmental Income Statement.

Also notice they keep saying they need the density to support the retail. Well if they built more units for moderate and some middle income units they wouldn't need the density as the community would have more disposable income and be a true mixed income development that would be viable long term. Many of Arker's other developments don't even have close to this much density **AND** are **TRUE** mixed income developments with plenty of retail. So Arker should go back to the drawing board and come up with a better plan that will serve the current residents.

The proposed supermarket is a good thing with the proposed development, but as you can see from the past article the community needs **A LOT MORE** job opportunities than just a supermarket for **CURRENT** local residents. **SO** will there be any job opportunities for the 7,500+ new residents the Arker company wants to bring into the community. The local Stop and Shop is 55,000 square feet and at the time had 160 **PART TIME** workers. The proposed Western Beef would be significantly smaller and employ fewer local residents.

They say the affordable housing is for families, however an affordable housing development of this size would create a shortage of 353 seats in publicly funded child care and they would operate at 168% of capacity. This is in addition to the 2,000 elementary school seats that they would be short. Tell me again how this will help children.

Check out Chapter 8 of the Environmental Impact Statement. Look at the design of the buildings and how they will dwarf the surrounding buildings.

The Peninsula Hospital plan goes against EVERYTHING Community Board 14 had voted on and approved not long ago.

1. No affordable housing be developed that is NOT at least 60% AMI.
2. Greater emphasis be put on homeownership and preferably market rate housing.
3. No reduction in the 85% parking requirements be granted on any new building.

The Arker Companies and the Council Member need to pay attention and read this article from someone who has lots of credibility and heed the information from the last paragraph.

The Director of Public Policy at Enterprise Community Partners and a woman of color says: "any new land use policy must make a specific effort to undo racial and economic segregation and prevent it from harming the communities it seeks to rebuild. An effective policy must ensure that municipalities do their due diligence to affirmatively further fair housing and do not further exacerbate the poverty and community disinvestment in racially or ethnically concentrated areas. Without an explicit plan for inclusion, we invite history to repeat itself."

NYU School of Law – Wagner School of Public Service – Furman Center –

www.furmancenter.org

[Justice Zoning: Without it, We Invite History to Repeat Itself](#) – Lorraine Y. Collins of Enterprise Community Partners notes that policies can be exclusionary at all levels government, and that only intentionally inclusive land use decisions will address segregation. She recommends strategies for incorporating a fair housing lens into affordable housing policy.

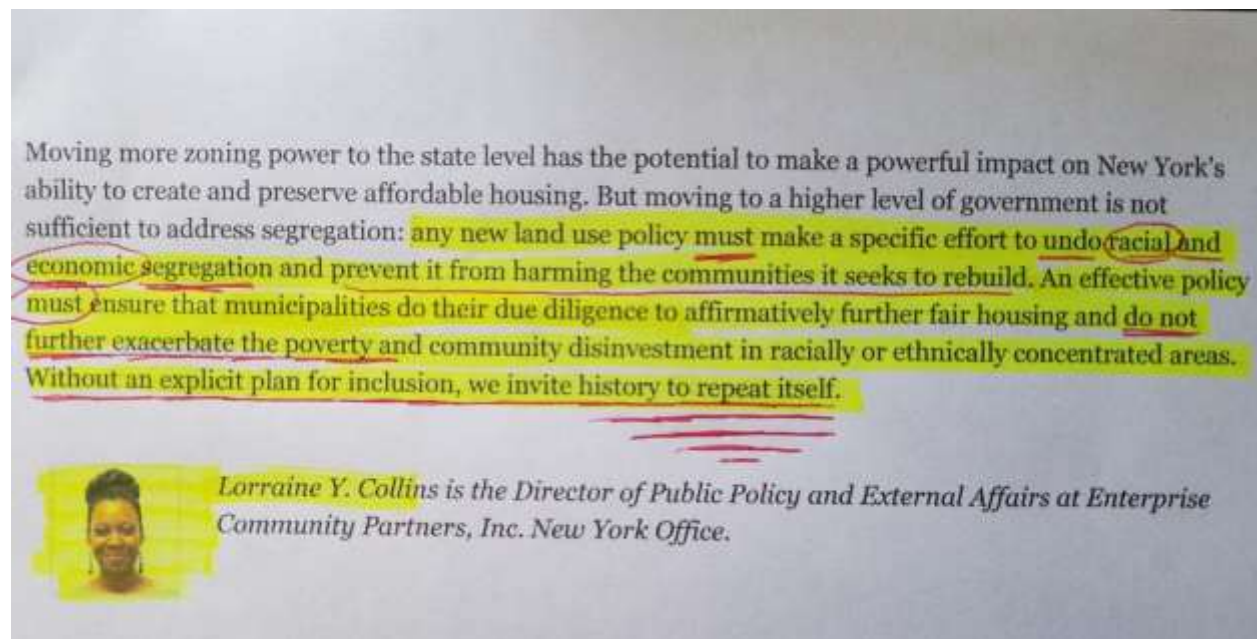


Figure 7 - Lorraine Collins, Enterprise Community Partners statement

According to a report by the New York City Planning Commission Arverne Urban Renewal EIS Calendar from November 3, 2003 / Calendar No. 2 C 030509 HUQ:

Half of the subsidized housing in Queens was located on the Rockaway Peninsula and construction of additional low and moderate-income housing in Arverne would only increase the proportion.

This is the city's own study and what does Arker and De Blasio Administration want to do? They want to create more concentrated poverty by failing to build adequate amount of moderate and middle income units!

There is an area of East New York that is being revitalized with affordable housing. That is the area behind the Gateway Mall (Erskine St) off the Belt Parkway. This is nicely done and is mostly a RESPONSIBLE Development. This is in an area that is not isolated from the rest of the city and has plenty of jobs to offer its new residents. Six (6) story buildings, NOT nineteen (19).

Other things to consider

The initial public meeting, a “Scoping Meeting”, was held at 4 pm on April 26th 2018.

The special community board meeting was held on Primary Election Day effectively suppressing turn out of concerned residents. But not project supporters who were bussed to the meeting from Far Rockaway.

Arker presentations were made to appear as though they were official government meetings.

The HPD *Resilient Edgemere* study which was conducted over many months and included significant community representation concluded that this sort of development was exactly what this area did not need and should not be built. It recommended that only one or two family homes should be built in the area along with retail and parks.

They claim to have contacted community organizations. The Bayswater Civic Association invited them near the beginning of the project, but they declined the invitation.

If the Arker Companies wants to create jobs why don't they move their headquarters to the Development when it is complete and hire locals?

Now that's creating economic opportunity. While they are at it maybe they can take the penthouse and live in the community they build and then they will truly understand the issues facing our community!

Change and development can be a good thing if it's done properly. However, the current plan to redevelop Peninsula Hospital does NOT do enough positive things for the community and there are many negative things that will have a significant adverse impact on our quality of life, especially the lives of our children.

The city and local politicians have not learned from past failures when it comes to housing.

It's great to see our councilman getting an award for Affordable Housing "Homeownership." And if he is such an advocate for homeownership he should ensure the proposed development includes some homeownership especially when it is something that Community Board #14 requested a few years ago when it comes to affordable housing in the community. In his own words he states homeownership is a vehicle for closing the wealth gap. So then why is he not fighting to get affordable homeownership as part of the plan??

Well this is his chance to give the residents of the Rockaway community a hand up and fight for homeownership as part of the plan.

I am a bit confused. If Donovan Richards believes that all of this new housing that he is sponsoring is so great, and Far Rockaway is truly being revitalized, why did he move out of Rockaway?

But perhaps most significant, when asked if they had given money to either Mayor de Blasio or Councilman Richards, they turned red and refused to answer! They only said that "we obey the law." Their implication must be that they have found a way to bribe / pay off / funnel money to elected officials within the law. I suppose that if it is within the law it's technically not a bribe, but . . .

Donations to Mayor de Blasio:

	A	B	C	D	E
1	Arker to De Blasio		2015 also said 2017 so maybe for 2017 race		
2					
3	Arker companies	24,600			
4					
5	Alex Arker	400	2015		
6		400	2013		
7	Ray Arker Feigenblatt	4,950	2017	White pages lists as a	
8				Relation to the Arker	
9				Principles	
10	Alan Arker	400	2013		
11		400	2017		
12	Blanche Arker	4,950	2013	Relation to Arker	As per White pages
13		4,950	2014		
14	Dina Arker	4,950	2015	Relation to Arker	As per white pages
15	Joshua Arker	900	2015	Relation to Arker	As per white pages
16		4,050	2017		
17	Leslie	4,950	2015	Relation to Arker as per white pages	
18	Melissa	4,500	2015	Relation to Arker as per white pages	
19	Sol Arker	400	2015		
20		24,600			

Figure 8 - Donations to Mayor de Blasio

Chapter 2: Land Use, Zoning, and Public Policy

This chapter is required to examine potential impact of the Proposed Actions on land use, zoning, and public policy in the surrounding area. Of course there will not be much of an effect on the existing NYC Housing Authority projects. But that only applies to the area west of the proposed project. East lie one and two family houses. And south of the area is the Arverne East area.

This project, if approved, would be perhaps the clearest violation of the United States Fair Housing Act of 1968 ([42 U.S.C. § 3601](#) *et seq*), that can be imagined. Clearly it would meet the “disparate impact” test set by the Court in 2015 (*Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, 135 S. Ct. 2507 (2015)) but it would also meet the arguments presented by Justice Thomas’ in his dissent in as much as direct testimony before the commission argued in favor of a segregated project (Rev. Gray and Milan Taylor).

The City of New York, acting through the Planning Commission, may not lawfully permit this project.

We believe that the applicant’s Principal Conclusion that there will be no significant impacts are fanciful at best. The proposed project will certainly not enhance property values. Would you buy a one family house adjacent to a nineteen story public housing development? We believe that the effect of the project, as proposed would be devastating to the area of one and two family houses east of the project and make successful development of Arverne East considerably less likely. And the effect on the eastern end of Rockaway will be similarly negative.

It is absolutely immoral to continue the process, begun under Robert Moses and continued under successive administrations, of confining the city’s poorest, least educated, least advantaged, least healthy people in the Rockaways, the area of the city with some of the worst schools, worst health care availability, highest unemployment, fewest available jobs, and most similarly situated people. If this is not a clear violation of the U.S. Fair Housing Act of 1968 it would be difficult to find any violation of the Act.

The developer argues that the site has been “vacant and underused” for a number of years. Yes, there are any number of vacant sites in Rockaway. But that does not mean that every vacant site should have as many apartments as current technology will permit a builder to construct. Nor is it necessarily true that vacant is bad. There is an area of over 800 acres in the middle of Manhattan that is, essentially, vacant. Would Arker want to fill Central Park with housing?

The developer carefully picks and chooses comparisons. The proposed development would increase the area population by some 6,500 people (perhaps more) where all of Rockaway has fewer than 100,000 people and the local area has only fewer than 7,000 people. From this the developer concludes that the boundary of the area to be studied should only include a ¼ mile radius rather than a half mile radius! And much of this area is water so there is not too much to study. We would propose that the developer should have studied a 21.8 million square foot area of land $(.5 * 5,280)^2 * 3.14$ i.e. ½ mile squared times Pi.

Perhaps the most significant factor weighing against the developer's proposal was the city's most recent study of how the Edgemere area should be developed. The study, titled *Resilient Edgemere* (available at <https://www1.nyc.gov/assets/hpd/downloads/pdf/community/resilient-edgemere-report.pdf>) concludes that available land in the area should only be used for one of three purposes: stores, parkland, and one or two family housing.

A fundamental principal of zoning is that new construction should be in context with the neighborhood. The neighborhood includes housing that almost universally sits on significant plots of open space filled with grass all around the buildings. The developer proposes buildings that will have no side yards and will sit in the middle of concrete paving, just like Manhattan – a place that people come to Rockaway to escape.

The developer complains that the existing zoning is “insufficient to achieve the proposed density.” But what does this mean? If one has property zoned R1 and wishes to build an R4 apartment house, then the zoning is insufficient. Does this indicate that there is a problem with the zoning or a problem with the builder? We would suggest that the problem is with a builder who wants to build what is clearly not permitted.

The developer argues that the project site is located on two wide streets—Rockaway Beach Boulevard and Beach Channel Drive that “can support increased density and the commercial development.” In fact, each of these streets has only one traffic lane in each direction despite the developer's description of them as “wide.” One would suppose that a wide street would have several lanes in each direction, not just one.

The developer goes on to discuss the vast transportation available to Rockaway residents such as the standing room only “A” train and the ferry that each take at least an hour and a half to get to midtown Manhattan (and for the ferry, add another half hour for the bus to the ferry), the Q 52 bus that takes an hour and a half to get to central Queens, and the Q 22 bus that takes an hour to transverse the Rockaways. With these wonderful transportation options the developer sees no need to provide parking for cars.

And the developer is truly to be admired for wanting to provide open spaces – for paved streets and sidewalks. People in the Rockaways think of grass and shrubs and even small trees like oaks and maples when they discuss open spaces. Not concrete.

Public Policy

OneNYC/PlaNYC

The developer reports that the “Proposed Project would be consistent with Visions 1 and 2 in *OneNYC*.”

Vision 1: Our Growing, Thriving City

The developer argues that any housing construction supports this goal, and the more the better. If the Planning Commission accepts this point of view, there is no further need for it to exist. The largest building that an architect and engineer can construct on a site is, by this definition the most desirable. There is no need for further analysis. We believe that this point of view is at best, mistaken.

As additional support for stuffing this huge project into the tiny area, the developer proposes it as MIH, adding more public housing to an area that already has half of Queens’ publicly financed housing! Is there no end to sophistry?

Finally, the applicant claims that the project would help achieve “vibrant neighborhoods by alleviating barriers to mixed-use development.” We believe that it would do no such thing.

- It would accentuate neighborhood racial segregation.
- It would accentuate neighborhood economic segregation.
- It would add a low class supermarket to compete with the existing neighborhood supermarket.
- It would add medical offices to compete with the existing nearby, highly regarded, Addabbo health center.
- It would, for all practical purposes, create a permanent bar to virtually all potential middle income and most moderate income residents.
- It would be unavailable to almost all NYC employees.
- It would enshrine Robert Moses’ legacy.

Vision 2: Our Just and Equitable City

“Vision 2 strives to achieve an inclusive, equitable economy that offers well-paying jobs and opportunity for all to live with dignity and security in NYC.”

The applicant explains that it would achieve this (Healthy Neighborhoods, Active Living) by providing 24,000 sf of concrete paving open to the public but fails to explain how its concrete would differ from any other street. It does say that they would create a timber play area and landscape the concrete, but it does not seem as though it would be much more than any Manhattan street. Certainly not a Rockaway street.

Housing New York

The developer claims that the project would provide 1,927 apartments permanently restricted to those with incomes up to 80% of AMI. Like so much of the developer's arguments, **it is truer for what it omits**. 87% of the units are to be for extremely low, very low and low income and not available for two earner NYC employees. Only 13% of the apartments would be available for moderate income rental (80% of AMI).

In other sections of this chapter, the developer touts the fact that they will comply with the law in regards to Costal Zone regulations, etc. Of course we expect them to comply with the law, so there should be no points for that. We also expect that they will supply heat, water, and electricity. So what?

Other portions of the chapter make no sense at all, although that may not be the developer's fault. They explain that there will be adequate city services because the area is or will be served by a 36" water main and new 10" and 18" sanitary sewers. We would not expect the project to use 100% of these resources, but since all of the fresh water will ultimately flow into the sanitary sewers, the math is confusing. A 36" pipe has a cross sectional area of roughly 1,000 sq. inches while a 10" and an 18" pipe have cross sectional areas of 80 and 256 square inches respectively (330 in² total). It seems clear that the sanitary sewer capacity is only a third of the water main capacity not considering that fresh water flows under pressure while waste water does not. In addition, the developer suggests that storm water will be discharged to sanitary sewers (Policy 5.1).

The developer continues, stating that the project would not result in any adverse impacts on high schools or libraries since these resources are measured on a borough basis despite that lack of transportation. The developer suggests that it is no problem at all for children to travel for an hour and a half or more each way to reach high schools or libraries.

The project's proposals for flood mitigation are alarming for the nearby community. While the developer proposes to entrain some water in tanks during the height of a storm or flooding, the key aspect of the project will transfer significant amounts of water from the project site to the surrounding area due to elevation and sloping of the project site. We believe that either the center of the project roadways must be at surrounding grade level or lower, or the design must capture 100% of drainage from the project streets before it leaves the project and enters the public streets.

Chapter 3: Socioeconomic Conditions

The developer proposes to more than double the area population, from 6,848 to 14,545 people.

Dwelling units in the area are as follows:

Current dwelling units	4,908
Publicly funded housing	4,107
Owner occupied	280
Unoccupied	552
Vulnerable to displacement	183

Note that the developer's arithmetic is not correct as they report 4,107 units in publicly funded housing and 280 owner occupied units = 4,387 units but they report only 4,356 occupied units.

The 552 unoccupied units are so generally due to Superstorm Sandy damage.

The publicly funded apartments are as follows:

Arverne/Nordeck Apartments	342
NYCHA Ocean View Apartments (Bayside)	1,395
NYCHA Ocean View Apartments (Oceanside)	418
NYCHA Beach 41 st Street	712
Arverne View Apartments	1,091
309 Beach 53 rd Street	16
334 Beach 54 th Street	32
<u>Beach Green Dunes*</u>	<u>101</u>
Total Publicly Funded Apartments	4,107

The developer discusses rents in the area and also Arverne by the Sea, an area of market rate, owner occupied buildings and concludes that tenants are, by and large, rent burdened since the developer guesses that most are paying more than 40% of their income in rent while the definition of rent burdened is paying over 30% of income in rent. The developer fails to note that most people in Queens and New York City as a whole are paying somewhat over 40% of their income in rent. Thus, the area is a fair reflection of the borough and the city.

Perhaps more important, the developer discusses the possibility of what is colloquially called gentrification and correctly concludes that gentrification is not possible in the area since apartments are overwhelmingly publicly funded.

The developer argues that the project would produce a substantial amount of new housing, increasing the number of dwelling units / apartments in the area by over 50% on only 9.34 acres. Implicit in the developer's statement that building new housing, in any amount, at any location is always good. We don't believe that this is the case. If one were to accept the developer's

reasoning, why not build 100 story apartment buildings in Central Park? There is substantial unused space and it is even near a number of mass transit facilities. Clearly the argument is absurd for any number of reasons. The fact is that apartments must be sited in appropriate locations and fit into the neighborhood. That is not the case with this project.

Housing for housing's sake must not be the only goal. Housing must fit into the neighborhood in terms of scale and amenities. This project does not. It would grossly alter the character of the neighborhood in terms of size, scale, effect on transportation throughout the Rockaways, as well as deal a punishing blow to an already suffering educational environment.

Chapter 4: Community Facilities and Services (Schools, Libraries, Day Care)

The Draft (EIS) Environmental Impact Statement report clearly states that this proposed development would have Significant Adverse Impact on both Elementary AND Intermediate Schools in the section of the Rockaway as well as on library services and child care.

This plan will bring in over 1,200 school-age children (by the developer's reckoning) to a location where the current area schools are already overcrowded AND underperforming.

It seems more likely that if there are going to be over 6,000 new residents, it is safe to say about one-third of those residents will be children of school age. That means the center of Rockaway will get approximately 1,500- 2,000 new school age students rather than 1,200 students.

Neither the Arker Companies nor the Board of Education have any plans to build even one new school. Residents of Arverne by the Sea are still waiting for a new school for over a decade, and there is not even a shovel in the ground.

The developer reports that there are 1,632 apartment over and above the 568 permitted as of right but that 201 of these apartments are for senior citizens and therefore should not be counted. That is an unreasonable conclusion since all too often grandparents and great grandparents are taking care of their grandchildren. Therefore, the developer chooses to only count the children in 1,431 units.

The developer thus reports that the project will add the following number of students over and above those who would be added by the as of right construction:

<u>School Classification</u>	<u>Number Added*</u>	<u>Counting Senior Apts*</u>
Child Care	242 Seats	270 Seats
Elementary School	444 Students	506 Students
Middle School	200 Students	228 Students
<u>High School</u>	<u>186 Students</u>	<u>212 Students</u>
Totals	1,072 Students	1,216 Students over and above the students from the 568 as of right apartments

Note *: For school seats, the number of school seats attributable to the apartments over and above the 568 apartments that could be built as of right.

Community School District 27, Sub-district 1 would thus operate with a shortfall of 1,991 seats if the developer builds this project as designed. The developer discusses schools in Sub-district 1 as though they would all be readily accessible to residents of the project but **that is not true**. As mentioned multiple times in this response, Rockaway's position as a narrow peninsula with limited access to the "mainland" means that not all of the schools are reasonably accessible to project residents.

The developer points out that there are some schools in the Rockaways that are below capacity but neglects to say why. The fact is that while many of the area schools are underperforming, the schools with excess capacity are not merely underperforming, but positively terrible.

In addition, the developer reports that the School Construction Authority expects enrollment in the Rockaways to decrease despite the construction of thousands of apartments in the Downtown Far Rockaway Revitalization Area and Arverne East! The analysis is positively remarkable.

This would be a very significant adverse condition that the developer has no plans or willingness to mitigate.

The proposed project would also increase the high school utilization rate which already has a shortfall of 12,799 seats for Queens, but counting against such a large base, the percentage is not high enough to count as a significant adverse condition. The developer does not report the effect on the local high schools, however.

In addition to the impact on schools, the project would increase the population using the Arverne library but the developer argues that residents can use other libraries, or the Queens Central Library, a nearly two hour trip from the project via mass transit!

The developer also reports that the project would result in a need for an additional 242 child care seats so that the area would have a net shortfall of 353 seats (again assuming that none of the seniors have grandchildren in need of seats).

The developer recites available medical facilities to claim that there will be no effect on area health care. But as pointed out elsewhere in this response, Rockaway is a narrow peninsula with two through roads, each of which has only one lane in each direction for most of their lengths. The chapter on Transportation makes it clear that the project will have a serious, perhaps deadly effect on medical care for anyone who has to pass the project. Ambulances traveling from west of the project to St. John's Hospital could experience significant, perhaps life threatening, delays.

Likewise, police and fire response that has to pass this project could experience significant delays. Of course, most NYPD and FDNY responses do not involve life safety conditions. But some do.

Education, generally

The two nearest schools, PS/IS 105 is at 112% capacity and PS 106 is at 134% capacity. When this project is complete the sub-district will be 2,000 Elementary School seats short and schools would operate at 135% of capacity?. Even if they promised to build a new school it would not resolve the overcrowding issue. The only way to resolve the overcrowding issue is to reduce the density of the development.

Issues:

- The new development would leave 220 students without school seats due to overcrowding.
- Not to mention that all the local schools in the area are already underperforming.
- The Arker Companies and our city officials have failed to explain how is this a benefit to the community?
- Will they promise a school like Arverne by the Sea did and then not build it too??
- CB#14 report recommends no more than 1,679 units be built to ensure every child has an opportunity at a good solid public education. Even that number will increase school overcrowding.

- Even if they do PROMISE to build a new school how long will it take to get done?
- If they do build one, how many seats will it have?
- The two area schools are already overcrowded and perform below average (see the report cards).
- Where will children in the project go to school?
- And the above discussion only covers elementary school. What will happen to these children in middle school and high school?

How are children going to succeed when we're cramming them into overcrowded and already underperforming schools?

How are children supposed to have an opportunity to get ahead when the, city, builder and politicians are setting up our children for failure by NOT providing them with adequate and safe learning environment? The community needs two new schools for 1,500 NEW children

One of the main reasons the community opposes the Current development plan is the SEVERE negative impact it would have on current and future school age children.

Mayor de Blasio and councilman Richards seem to assume that because the new residents are poor they won't send their children to school. Why else no seats?

Chapter 5: Open Space

The developer reports that there would be a significant decrease in the open space and in the Open Space Ratio. The OSR would be decreased by over 16%. In fact, there would be little open space in the project other than streets and sidewalks. There would be no grass areas in the project. The truth is that the only real open space (aside from streets) would be outside of the project.

The developer notes that there is significant open space to the south of the project and across the Freeway on the boardwalk and beach. The developer neglects to say that the beach is closed to the public due to piping plover nesting in this area. Further, the Freeway is a solid barrier from Beach 44th Street to Beach 54th Street, making the beach and boardwalk is for all practical purposes inaccessible. The developer has claimed that Beach 52nd Street will be “reopened” but it has never been open and DOT has moved to reduce Freeway crossings rather than increase them.

The developer also wishes to count the Rockaway Youth Task Force Garden, the Farm Rockaway and the Edgemere Urban Renewal Park community garden areas despite the fact that their use is restricted to members of these organizations and the properties are locked when not used by these organizations for their purposes. They are not available open spaces, except to look at.

The project design may be appropriate for midtown Manhattan, but not for Rockaway. People move to Rockaway because of the open spaces, not despite them.

Chapter 6: Shadows

It is a well-known fact that 19 story buildings don't cast shadows so there is no need for this analysis. Further, the fact that the shadows will be cast on concrete matters not at all. People who walk or live in the shadows are not plant material and so, under the analysis criteria, don't matter. In fact, it appears that the entire project's new streets will be in shadow most of the day. We would argue that the CEQR Technical Manual is fundamentally defective in that it fails to address the effect of projects such as this on the livability of small neighborhoods. The developer's own diagrams show a significant effect on the surrounding area. But people are not a sunlight-sensitive resource.

Chapter 7: Historic and Cultural Resources

We have no issues with the historic and cultural analysis.

Chapter 8: Urban Design and Visual Resources

The developer claims that the project is in character with the surrounding buildings but that is **simply untrue**. Of all the buildings within a mile of the project, only two are over twelve stories tall. The developer says that the project will gradually reduce the building height from nineteen stories, but on a single block, there can be no such thing as a gradual height reduction. That is like saying that the height of the Empire State building gradually reduces to the adjoining buildings because of the setbacks. It is an absurd statement.

Another absurd statement is that the “superblock” would be broken up by the addition of a new street. Any construction would have to do this so they are not doing anyone special favors. And their contention that they will reopen Beach 52 Street across the Freeway is **yet another lie**. There are only limited crossings of the freeway as there have been since it was built, and since the LIRR ran at ground level. Beach 52 Street has never crossed the tracks so it cannot be “reopened.”

Chapter 9: Hazardous Materials

We are concerned that the examination of the site for hazardous materials does not appear to have included a search for radioactive material despite the fact that the hospital used a variety of radio isotopes for diagnosis and treatment over the years.

We do not believe that the study should be accepted as complete.

Chapter 10: Water and Sewer Infrastructure

We agree that the project would not have a significant effect on the city's water supply but we believe that is not the only question that must be answered in relation to water supply. Almost all of the city receives its water through a mesh network with multiple connections to the Water Tunnels, particularly to Water Tunnel No. 3. This is not true of the Rockaways. We receive our water through limited connections to the "mainland." During the summer, when demand for water increases due to watering lawns and open fire hydrants, pressure often drops significantly. We believe therefore that it is imperative that a complete analysis be performed of the effect of this project on the Rockaway water supply and water pressure.

In terms of wastewater, the developer reports that the "proposed Project could result in a substantial increase in sanitary flow to the adjacent sewers." And a hydraulic analysis may be required. It would seem reasonable that such an analysis be performed before requesting approval for this project. Or will they build the project and then demand that the city solve their problem?

The developer states that there are not expected to be any storm water problems but once again ignores reality. The developer proposes to build a project higher than the surrounding land. Thus, a substantial amount of storm water from the developer's property will flow onto property of adjacent landowners, including the nearby nursing homes, school, and NYCHA projects. What is worse, water from this project may make Beach Channel Drive, Rockaway's major through street, impassible. But there will be no problem on the developer's property.

Chapter 11: Solid Waste and Sanitation Services

We have no issues with the solid waste analysis.

Chapter 12: Transportation

Methodology

We are concerned that in some ways, the developer goes into great detail about the transportation analysis methodology. But in what may be the most important question in a resort area such as Rockaway that has been and is becoming once again, there is no data on what season the analysis was conducted in. Rockaway is a very different place in December than it is in July.

Also, the analysis discusses a number of streets that are not through streets including Rockaway Freeway, Arverne Avenue, and Rockaway Beach Boulevard from Beach 36th Street to when it becomes Arverne Boulevard.

Beach 52nd Street

The DEIS reports that the project will “re-establish a portion of Beach 52nd Street south of Rockaway Beach Boulevard to reconnect with Rockaway Freeway” that has never existed **[false statement]**. Based on recent NYC DOT actions, there is no reason to suppose that DOT would permit traffic to cross the Freeway at an additional location. In fact, multiple freeway crossings have been closed,

Parking

Arker is requesting 2,200 residential dwelling units with 744 parking spaces for those units. They would provide additional parking for retail use, and for their medical center but they fail to specify how many of these would be used for employees. Also, they claim that they will provide 300 new, permanent jobs. How many of these people will drive to work? Where will they park? As proof that parking is not required, they claim that parking spaces at the NYCHA projects are underused. What they really are saying is that people can't afford the fees, so they park on the street. Any evening there is no parking for blocks in any direction of the existing public housing, while the police permit double parking south of the Freeway to accommodate residents.

There are no data provided to justify the sponsor's choice of peak hours, so a proper analysis is impossible but their choice does not appear to be reasonable to residents familiar with traffic in the area.

The current plan is to only provide parking for 35% of the residential vehicles. We are an isolated community that wants good transportation alternatives and many people utilize their vehicles to get to areas that have better transportation alternatives. We believe that the statutory 85% parking requirement must be a minimum and approval of any additional apartments over the 568 as of right units should be conditional on providing 110% of the units with parking.

Kimberly Shakir-Costa: If they're putting on so few parking spots, what type of people are they expecting will live here? People with no job, or intention of getting a job? Public transportation to that area is the worst in the city. Without even the option for a private vehicle, and no local job opportunities, who do they expect will be living here?

Traffic Flow and Operating Conditions

The developer admits that even with the very few parking spaces that they are providing there will be serious adverse impacts on traffic flow throughout the Rockaway Peninsula even if the NYC DOT implements every one of their suggestions. Twenty six intersections were identified as being affected starting at the easternmost intersection on Beach Channel Drive at Hassock Street and continuing to the Beach Channel Drive intersection at Beach 116 Street.

More important than the effect on traffic generally is how the project would affect emergency services. Informal discussions indicate that there is already a traffic problem on roadways in the project's vicinity. There are currently problems responding to emergency conditions such as heart attacks. What would happen when there is a fire and apparatus from east needs to go to the west end or vice versa? What about police emergency responses that might be blocked or slowed in this area? Keep in mind that Beach Channel Drive has only one traffic lane in each direction and the parking lanes are typically occupied by parked cars. The same situation is true of Edgemere Avenue, the other through street.

Subway Stations

The developer concludes that there would be no adverse impact on subway stations and we agree.

Subway Line-Haul

The developer concludes that there would be no adverse impact on "A" train service. We strongly disagree. There are few, if any seats when the train leaves Beach 67 Street. When the train leaves Broad Channel after it has picked up people from the Rockaway Park shuttle, there are no seats to be had during rush "hour." By the time that the train reaches Rockaway Boulevard, there is room only for sardines.

One could argue that the Transit Authority could run additional trains, but the Cranbury Street Tunnel that takes the "A" and "C" lines from Brooklyn to Manhattan is operating at effective capacity or above. Queuing theory demonstrates that between 85% and 90% of capacity lines lengthen dramatically. The only reason that the system doesn't break down completely is that as rush "hour" ends the backed up trains fill in newly available slots.

Bus

The developer admits that Q 22 and Q 52 buses would operate above capacity. The proposed solution, adding more buses, would of course make the un-remediated traffic problem worse.

Sidewalks, Crosswalks, and Corners

The developer claims that all but a few would operate satisfactorily but the developer fails to analyze the impact of the increased pedestrian traffic (and jaywalking) on the vehicular traffic.

Chapter 13: Air Quality

The developer concedes that the project would result a significant adverse impact on air quality. While we agree with the conclusion, we believe that the developer's analysis is flawed.

Based on overall car ownership in Rockaway, including the immediately adjacent NYCHA projects, we believe that car ownership will likely be between 85% and 110% of the apartments (allowing for 2 car families). Since the developer is only providing parking for a small fraction of the likely cars, and parking on the surrounding streets is already taken up at night (including areas where the police allow double parking) it seems likely that there will be substantial additional pollution generated from vehicles cruising in search of parking. The developer's analysis fails to take this into account.

In a demonstration of segmentation and sophistry, in this section the developer states that examination of DEP and NYS DEC databases reveal no "permitted industrial facilities within 400-feet of the Project Site, supplemented by field reconnaissance." **This is another true statement that results in false conclusions.** The discussion of the MTA bus facility only considers bus traffic on city streets. Even a cursory observation of the facility would reveal extensive bus operation as buses are moved around the parking lot and repositioned in addition to bus maintenance. The MTA bus maintenance facility and parking lot that the developer has identified in other places in the EIS may not qualify as a "industrial facility" but there can be no doubt that a very large number of diesel busses generate a very significant amount of air pollution, particularly particulate matter from burning fuel and compressed air used to clean engine and wheel parts, especially brakes.

Thus, the developer's analysis of traffic patterns and bus routes / schedules ignores the effect of the depot on local air pollution.

In addition to the pollution from motor vehicles and the MTA facility, the developer has committed to generating additional pollution by using a fossil fuel (natural gas – if available) based HVAC systems rather than a readily available geothermal system. Further pollution will be generated by the use of electric package terminal air conditioning (PTAC) systems for the apartments which again will use fossil fuel based electricity. It is true that the pollution generated by generating the electricity for the HVAC systems would not be on site, it would still be real area pollution and might be as near as the National Grid Far Rockaway Generating Station.

As mentioned elsewhere in the paper, the traffic analyses presented in this chapter fails to identify the season of the analysis. Rockaway traffic is subject to typical summer resort effects. The fact that Saturday traffic is lower than weekday suggests that this is a winter rather than summer analysis.

Under the heading "Large or Major Sources" the developer discusses a facility at the NYCHA Bayside Houses complex of 31 nine-story buildings comprising 1.3 million sf. The developer reports that no permits appear on the record, but fails to explain how these buildings are heated. Plainly there must be a significant unpermitted facility since magic is not an adequate

engineering explanation as to how heat for a million sf. is provided. But again, the developer reports that no further study is required!

We believe that neither PTAC units nor fossil fuel should not be permitted for heating at this project. The developer should be required to use geothermal systems.

Chapter 14: Greenhouse Gas Emissions and Climate Change

Once again we must take issue with the developer's methodology.

First of all, the developer only appears to take into account on site burning of natural gas for the residential apartments. Second, use of natural gas by the various stores, medical offices, etc. is ignored. Perhaps most significant is the fact that the developer ignores the energy used for heating the apartments because they are heated with electricity! Of course generation of electricity is not a free resource.

The developer claims that it will use "energy-efficient package terminal air conditioning" units. But what does this mean? The best units typically have an EER of less than 12. In addition, on cold days they typically resort to electric resistance heating, a very inefficient use of energy. How would they compare with a geothermal system?

At least in the foreseeable future, incremental electricity use is generated by burning fossil fuels since all of the available hydro power in the area has been exploited. This is a significant, deliberate flaw (fraud?) in the analysis.

If the developer's point of view were to be accepted, all buildings in the city could meet the required energy reduction goals by converting to electricity! This would clearly not be a carbon neutral result.

But leaving aside these arguments, the developer makes the absurd argument that "the Project Site is well-served by public transit." That is obviously the reason for the very high level of automobile ownership in Rockaway, and area that has generally been described as a "transit desert." Yes, we have buses, but they do a rotten job in terms of transit.

People have described traveling on the Q 22 as death by old age. A fifteen minute trip the length of Rockaway typically takes an hour or more. A half hour trip to central Queens on the Q 52 takes an hour and a half even with the bus lanes that slow traffic and are supposed to speed up the bus. And let's not discuss a trip to Jamaica or Queens College. Yes, the ferry is nice – if you are going to Wall Street, but it is still roughly an hour and a half, as is the subway to midtown Manhattan. But the developer's statement that the ferry stops just one block from the project just **isn't true**. The ferry landing is at Beach 108th Street. The bus to the ferry (hourly) does stop nearby, but it adds an additional half hour to the trip to Wall Street. Thus a ferry trip to Wall Street is an hour and a half while a trip to the east side of midtown Manhattan is approximately two hours.

There appears to be little reason to believe that the true impact of the project would be a real reduction of greenhouse gas emission overall. Yes, there would be a reduction on site, but only by shifting the emissions to other locations where the electricity is generated.

Chapter 15: Noise

While we do not have any significant issues with the developer's analysis of noise levels, we are concerned that the combination of wall / window sealing and sealed PTAC units does not allow for adequate ventilation. In a sealed box, human beings consume oxygen and expel carbon dioxide and water. The discussion does not discuss a means of ventilation.

Chapter 16: Public Health

We believe that this project will have a significant impact on public health.

The initial impact on public health will result from the projects' impact on traffic flow from the New York City / Nassau County line to Beach 116th Street. The developer concedes that even if the NYC Department of Transportation implements each of the developer's proposed remediation plans traffic will be adversely impacted the length of the peninsula. And it is by no means certain that DOT will implement their plans.

The consequence of traffic delays is increased air pollution. None of the developer's analysis has evaluated this matter.

In addition, we believe that the developer's assumptions about residents' automobile ownership are grossly understated, so traffic impact will be even worse than formally forecast.

The other side of pollution from additional traffic is the impact on emergency services. There are only two traffic lanes in each direction that run the length of the peninsula. The developer has failed to provide any analysis from the police department, FDNY's Emergency Medical Services, or FDNY's firefighting units discussing the impact of the project in their response times. Informal discussions with managers in these areas suggest that the result could be significant and possibly disastrous.

What would the result be of an extra minute or two in the response time for an ambulance in a cardiac arrest instance?

What would the effect be of an extra minute or two in the arrival of fire apparatus?

What would be the result of a delay if police from the 101st precinct had to assist in the 100th precinct, passing this project?

We believe that it would be grossly irresponsible to approve a project of this size without a thorough study of the effect on emergency response.

Chapter 17: Neighborhood Character

What is there to say about the character of the neighborhood?

The proposal is to construct buildings almost two times as tall as the NYCHA projects across Beach Channel Drive from this project and seven times as high as the one and two family houses to the east of the project. “In keeping with the character of the neighborhood!”

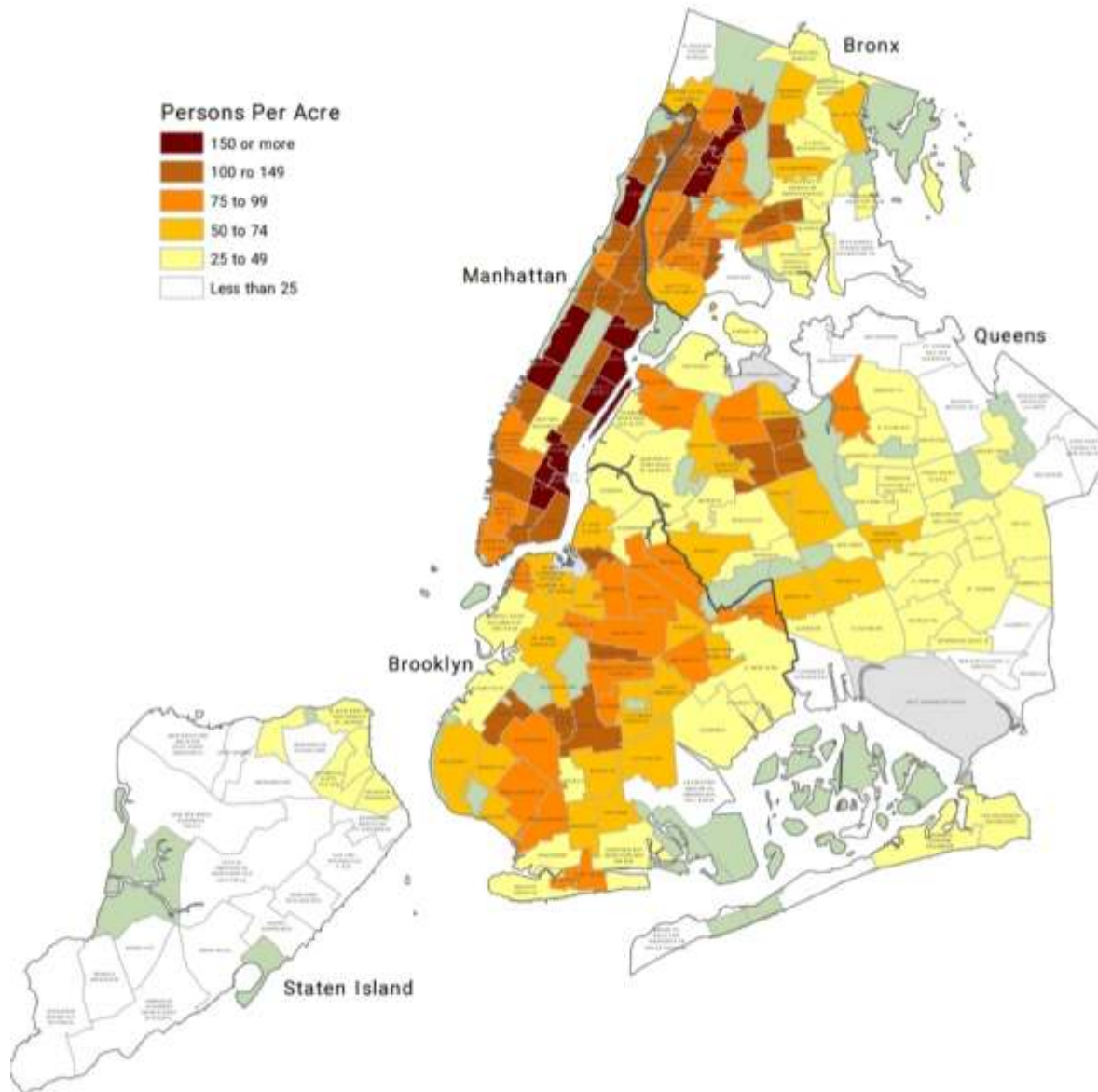
The density would be greater than any other project in the Rockaways. On a few acres it would put more people than the entire Broad Channel community.

It flies in the face of HPD’s assessment, *Resilient Edgemere*, of what should be built in Edgemere which recommended low rise construction.

In an area with extensive lawns, it would provide a few trees surrounded by concrete.

The information from the developer’s Peninsula Hospital Site plan shows a much more densely populated area compared to other developments in the Rockaways, and other affordable housing proposals built around the city by the Arker Companies and other developers. The developer proposes building 2,200 apartments which would house 6-7,000 people on roughly ten acres. That is approximately 600 people per acre for this project! As you can see from the map the majority of housing density is from 25-99 persons per acre. Additionally, when comparing the NYC map on density you can see the area neighborhood density would skyrocket to a ratio of 235 persons per acre – which is extremely dense as shown on the following map. The only other location in the city that has 600 people per acre is Manhattan.

PL-P2 NTA: Population Density by Neighborhood Tabulation Area*
 New York City, 2010



*Neighborhood Tabulation Areas or NTAs, are aggregations of census tracts that are subsets of New York City's 55 Public Use Microdata Areas (PUMAs). Primarily due to these constraints, NTA boundaries and their associated names may not definitively represent neighborhoods.

Source: U.S. Census Bureau, 2000 and 2010 Census Public Law 94-171 Files
 Population Division - New York City Department of City Planning



Figure 9 - People per Acre (NYC Department of City Planning)

The developer, in discussing socioeconomic conditions notes that there would be no change in socioeconomic conditions of the neighborhood. In fact, the project would reinforce the unlawful existing social, racial, and economic conditions of the neighborhood. We agree. For that reason, the City of New York may not lawfully provide any funding for this project.

The developer suggests that there would be no adverse socio economic impacts from the project. **This despite the very clear fact that the project would be built in clear violation of the Fair Housing Act of 1968 (Civil Rights Act of 1968, ([Pub.L. 90-284](#), 82 [Stat. 73](#), Titles 8 and 9). The adjacent NYCHA facilities are overwhelmingly African-American as this project is likely to be. Federal law and Supreme Court decisions specifically prohibit projects such as this. If it is built, Arker will undoubtedly be required to leave most apartments vacant until they are able to secure non-minority tenants who meet the income requirements. (Texas Dept. of Housing and Community Affairs v. Inclusive Communities Project, Inc., 576 U.S. ___ (2015))**

The project would have significantly less open space than any other construction in the area. Indeed, perhaps less than any other residential project in the Rockaways.

Nineteen story buildings are not expected to cast significant shadows on adjacent blocks. And they are certainly in the character of the adjoining one and two family homes to the east. Indeed, there are only two other buildings in the area of similar height and they are isolated with much lower buildings adjacent to them.

As with so much of the developer's Environmental Impact Statement, it contains the statement that there is adequate parking but provides absolutely no support. It fails to report how far existing residents have to walk to park their cars. It completely ignores the fact that parking is in such high demand that the police permit double parking adjacent to the Freeway on Edgemere Avenue.

Chapter 18: Construction

There are several factors that, while significant, are not discussed in the construction chapter.

There is extensive discussion of noise from various machinery that the developer expects to employ, but nothing about pile drivers. Pile drivers produce two undesirable side effects. The first is vibration. Pile drivers have the ability to shake nearby buildings, disturbing people inside. And pile drivers can produce extremely loud noise, albeit for short periods of time. Thus, a pile driver that produces 150 dB for 5 seconds every minute only produces an average of 12.5 dB. The discussion in the chapter discusses average noise, but not peak noise.

The noise and vibration of a pile driver can be intolerable. The construction site adjoins two nursing homes and a public school. We believe that pile driving can make learning at P.S. 105 impossible and drive nursing home residents to distraction.

In fact, we believe that pile driving noise may reach the level where it constitutes a criminal assault.

Action must be taken to protect the students at school and residents in the nursing homes from the sound and vibration from the pile drivers.

The developer also must insure that construction equipment does not endanger children when they are go to school at PS 105 as well as when they are going home.

Chapter 19: Alternatives

We believe that the appropriate alternative would be to allow the developer to build 568 market rate apartments as of right. We also believe that it would be appropriate to permit the developer to build stores along Beach Channel Drive as long as an adequate number of parking spaces are included for employees and shoppers.

While the developer, as all developers in the Rockaways, promises to provide medical offices, there is no explanation of where the practitioners will come from to fill these offices. And it ignores the very large Addabbo medical facility on Beach 62 Street which is currently undergoing construction to double its size. Based on promises and projections, Rockaway will soon have more medical offices than the east side of Manhattan!

The developer states that the no action alternative “would not meet the project goals to redevelop vacant and underutilized land to provide affordable and senior housing to the same extent as would the Proposed Project.” That is true, but like so many of the developer’s statements it is not relevant to the matter at hand. Of course fewer apartments would result in fewer apartments. If the object is to build as many apartments as it is possible to build, why stop at 2,200? Why not build 40 or 60 story buildings with 10,000 apartments? The developer offers no cogent reason for 2,200 apartments.

Likewise, the developer claims that it is building a “mixed income” development when it is, in fact, a very low income, privately owned but publicly financed housing project adjacent to a NYC Housing Authority project. If the city is going to finance this project, it should reap the profits, not a private developer.

The developer continues that if market rate housing is built on this site there is a “potential to introduce a trend or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population . . .” This is an **outright lie** since virtually all of the existing housing in the area is either publicly owned or subject to a variety of income restrictions. Thus gentrification is just not possible in Edgemere.

The developer’s figures on school seats are, to say the least, confusing.

<u>Alternative</u>	<u>No Action</u>	<u>Proposed</u>
Apartments	568	2,200
Elementary	176	162
Middle School	80	57
High School	74	

The conclusion seems to be that 568 market rate apartments would result in more public school students than 2,200 low income apartments.

The Peninsula Hospital site is the only significant location of open land in the area. The best use of the land would be to build two elementary schools to relieve the existing overcrowding and the additional overcrowding that will result from the construction of Arverne East.

Chapter 20: Mitigation

The applicant has not identified any mitigation measures that it is committed to taking. Indeed, at the various public relations meetings, the Community Board Land Use Committee, and the Community Board hearing, the developer had no answers. Whatever issue was raised, their answer was that they “would look into it”

Community Facilities and Services – Schools

The developer proposes no serious mitigation measures for the lack of school seats. Further, the developer refuses to count the children who are likely to live in the senior citizen apartments. While we would like retired people to not have to care for their grandchildren, who know that it happens all too often that grandparents are, in fact caring for their grandchildren or great grandchildren.

Open Space

Again, there is no serious discussion of mitigation measures. Providing a power washer to the Parks Department doesn't solve the problem. And replacing grass with green carpet is the essence of an anti-social activity since it removes plants that clean the air and replaces them with plastic.

Noise

The issue of noise is not seriously addressed at all. See the discussion in the next chapter.

Transportation

The developer spends many pages on mitigation measures for some of the traffic issues, but fails to address the bus and subway issues, and fails to consider the effect of additional buses on traffic and more pedestrian time at intersections on traffic.

A significant issue is the fact that the developer proposes unlawful traffic signal timing! Section 1680 of the NYS Vehicle and Traffic Law enacts the U.S. Manual of Uniform Traffic Control Devices. The MUTCD, among other things, specifies traffic signal timing. At 30 mph on a flat, straight roadway, a traffic signal must have an amber interval of 3.2 seconds but the proposal offers a 3.0 second amber interval on Beach Channel Drive, in violation of the law. The nearly 10% reduction in amber timing allows the applicant to claim that the road can handle more vehicles than it actually can. This, despite the fact that the applicant's engineer is a former NYC Transportation Commissioner!

Also of concern is the elimination of parking. The Community Board has already expressed concern about the developer's request to provide less parking than required under the zoning code (85%) with is probably not enough. But the mitigation measures propose eliminating parking spaces in the vicinity of the project site and at a variety of other locations on the peninsula. We believe that this is not acceptable.

Even with the proposed mitigation measures, traffic problems would be unmitigated at some of the worst intersections in the Rockaways:

- Seagirt Boulevard and Rockaway Freeway
- Beach Channel Drive and Hassock / Horton Avenue
- Beach Channel Drive and Nameoke Avenue
- Beach Channel Drive and Mott Avenue
- Beach Channel Drive and Dix Avenue
- Beach Channel Drive and Beach 116th Street

Perhaps most concerning of all is that they fail to discuss the effect of their proposed adjustments to traffic signal timing. What will be the effect of travel time between Far Rockaway and Beach 116 Street? What will the overall impact be on air quality? It seems clear that there must be an environmental impact study for their proposed transportation mitigation measures.

Chapter 21: Unavoidable Adverse Impacts

Schools

The effect of the project on schools is absolutely unacceptable. And the developer's arithmetic is, to say the least, remarkable. The developer supposes that 2,200 apartments would only have 219 elementary and middle school students! Plus 164 additional children would require space in child care and Headstart. These numbers seem remarkably low unless the developer adds birth control to the drinking water. What is most significant is that the developer says that it would "work with", "explore", and "consult with" NYC Administration for Children's Services (ACS), DOE, and SCA. These words have little to no real meaning. We, too will work with, explore, and consult with anyone who is interested in finding the pot of gold. But we all know that such actions are not likely to result in finding any gold. Nor are the developer's actions likely to result in school seats for children.

Parks and Open Space

The project's lack of open space (it seeks to recreate mid-town Manhattan in Rockaway) is completely out of character with the neighborhood. They are counting their paved sidewalks and concrete enclosed tree pits as open space and play areas. There will be no grass or greenery on the ground unless it is painted. But again, the developer will work with and consult with city agencies on the subject.

Transportation

Traffic

Traffic past the site will be significantly affected. The developer has picked certain supposed peak hours, but there is no doubt that there will be problems for much of the day and early evening hours. While the developer suggests that traffic light timing and other measures may mitigate some of the problem, even the developer admits that there is no solution overall. In addition, since we believe that the developer's expectation of car ownership is unrealistically low, the problems are likely to be even worse than the developer's already pessimistic forecast.

But the developer only discusses the impact on the very small, local area. Rockaway is a long, narrow peninsula. There are only two roads that provide an east / west path through the peninsula and each of these roads has only one lane in each direction. People traveling from one end to the other must pass this project. That means that there are very significant public safety aspects to the project's proposed traffic jams. How will the traffic problems affect ambulance travel times to the one available hospital? What about police and fire response times? There is no discussion of these issues at all.

Transit

The developer identifies a capacity problem on the Q 22 bus, but not the "A" train. But both would have problems.

The developer suggests that capacity problems on the Q 22 bus could be alleviated by adding buses. Of course, that is true. But it ignores that obvious fact that buses occupy space. So adding buses to ameliorate the transit problem makes the traffic problem worse

And there is no discussion of the project's impact on the subway. Yes, Frank Avenue / Beach 44 Street station is not very heavily used and could well handle more passengers. But once these passengers get on to the platform, where will they go? There are often no seats when the "A" train leaves Beach 60 Street now. The situation will become much worse when the thousands of new residents move into the new Downtown Far Rockaway buildings. People from Rockaway Park who board the "A" train at Broad Channel will be standing room only, if they can board at all. And the Cranbury Street Tunnel that carries the "A" and "C" trains to Manhattan is operating at effective capacity so no more trains can be added unless QueensRail™ is implemented.

Pedestrians

Once again, the developer's statements are less than truthful. The developer discusses pedestrian problems at certain intersections but neglects to mention that any resolution to pedestrian capacity must result in a concomitant reduction in vehicle capacity, thus making traffic worse.

Summary

The proposal would overburden service on the "A" train, area buses, and city streets. It is likely to result in deaths due to increased ambulance response and other emergency service times.

Noise

Again, the developer identifies a problem and then offers to "explore" solutions but refuses to commit to pay for the solutions. And installing air conditioners might be nice, who will pay for their operation? Will the developer commit to installing units with an EER of at least 12?

Construction

In addition to the developer's general discussion, the author attended JHS 198 (now Goldie Maple Academy) during the construction of the Nordeck Houses. While pile driving was in progress the noise and vibration was intolerable. What will the developer do to resolve this issue? Will the piles and driving mechanism be enclosed so that sound is directed only upward? Will residents be relocated?

Summary

Of course the developer does not view this as an adverse impact, but almost all Rockaway residents believe that the conversion of our seaside community into a replica of Manhattan is a very significant adverse impact. And we view the addition of more low income residents to an area without jobs or services as just another example of dumping on Rockaway. We have half of the borough's public housing, more than half of the nursing home beds, more than half of anything that negatively impacts a community. But who cares, it's Rockaway. The dumping

started with Robert Moses. It continued with John Lindsey. And it has accelerated under the current administration.

Chapter 22: Growth-Inducing Aspects of the Proposed Project

We agree with the developer that the project would not generate any additional growth beyond the project boundary in view of the fact that virtually all available land is occupied by various government agencies including the NYCHA, MTA, and FDNY. The only new businesses that we would expect would be that sites of previously existing stores are likely to become parking facilities for the new residents.

Chapter 23: Irreversible and Irretrievable Commitments of Resources

The developer states that:

- 1) The population of the Community Board 14 has been increasing.
- 2) Approximately 44% of the population is rent burdened.
- 3) Approximately 13.8% of residents in Queens CD 14 are age 65 and over, which is higher than both Queens and the City as a whole (13.4% and 12.7%, respectively).
- 4) The project would provide 2,200 dwelling units (DUs), including:
 - a) 1,927 would be income-restricted to household incomes up to 80% of Area Median Income
 - b) 201 DUs for Affordable Independent Residences for Seniors
- 5) Mayor Bill de Blasio's *Housing New York: A Five Borough, Ten-Year Plan*, which is a 10-year plan to build or preserve 200,000 affordable apartments across all five boroughs of New York City.
- 6) These proposed uses would be compatible with existing conditions and trends in the area as a whole and would be appropriate for the Project Site's location, which is well-served by:
 - a) existing infrastructure,
 - b) public facilities, and
 - c) residential amenities.

These arguments have nothing to do with commitments of resources and are irrelevant to the intent of the chapter. But let us discuss them because they are significant, and evidence of the developer's wholesale **untruths and half-truths**.

Let us consider each of the developer's statements.

- 1) The population of the Community Board 14 has been increasing. What are the comparison years? Since Robert Moses forced thousands of people out of the Rockaways, or before? Since many homes have been rebuilt after Sandy? The developer is just throwing words around, implying that people have been moving to Rockaway and living in the streets.
- 2) Approximately 44% of the population is rent burdened. And how does this compare to the city as a whole? Is this a particular Rockaway problem that the developer is seeking to alleviate? Or is the developer continuing the Robert Moses policy of moving as many of the city's less affluent population to Rockaway?
- 3) Approximately 13.8% of residents in Queens CD 14 are age 65 and over, which is higher than both Queens and the City as a whole (13.4% and 12.7%, respectively). Again, a statistic without meaning. First, there is not a significant difference between the senior population of CD 14 and either Queens or the city as a whole. More to the point is the suggestion that Rockaway Seniors require subsidized housing more than the city as a whole. In fact, the Rockaways has a substantial number of retired city civil servants who are quite comfortable.
- 4) The project would provide 2,200 dwelling units (DUs), including:

- a) 1,927 would be income-restricted to household incomes up to 80% of Area Median Income. Again, a statement that, while true suggests that the apartments will be rented at 80% of the AMI. In fact, most apartments will be rented at very substantially less than the AMI. Most civil servants will not be eligible for these apartments. Indeed, working couples making even slightly more than the minimum wage will not be eligible.
 - b) 201 DUs for Affordable Independent Residences for Seniors. It is, of course a good thing to provide apartments for senior citizens but the developer's suggestion that there is a substantial number of Rockaway seniors without housing is unsupported by the facts. How many of the apartments in the developer's Beach 34 Street project went to Rockaway seniors? What about the very substantial number of senior citizen buildings, including those operated by JASA? And, of course, the fairly large number of retired civil service employees living in their fully paid off private homes count toward the number of senior citizens in the area but should not be counted as needing housing.
- 5) Mayor Bill de Blasio's *Housing New York: A Five Borough, Ten-Year Plan*, is a 10-year plan to build or preserve 200,000 affordable apartments across all five boroughs of New York City. And the developer believes that the Rockaways, with about 1% of the city population should host 1% of these units in this one site! Never mind the other projects on the drawing board for Rockaway?
- 6) These proposed uses would be compatible with existing conditions and trends in the area as a whole and would be appropriate for the Project Site's location, which is well-served by:
- a) existing infrastructure,
 - b) public facilities, and
 - c) residential amenities.
 - d) This is the most preposterous statement of all. There are no public facilities in the area. In fact, Rockaway has a crying need for public facilities and a remarkable lack of them. And in terms of residential amenities, one of the developer's significant arguments is that there are no amenities in the area and that 2,200 apartments filled with people who have little disposable income will create them.

We may not have the Brooklyn Bridge to sell, but we do have two bridges to sell if anyone is interested.

From: [PublicComments_DL](#)
To: [Hallah Saleh \(DCP\)](#); [QueensComments_DL](#)
Subject: Comments re: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan
Date: Monday, August 26, 2019 2:55:58 PM
Attachments: [Peninsula Hospital Presentation City Planning Commission.pdf](#)

Re. Project: **C 190325 ZMQ - Peninsula Hospital Redevelopment Plan**

- Application Number: **C 190325 ZMQ**
- Project: **Peninsula Hospital Redevelopment Plan**
- Public Hearing Date: **08/14/2019**
- Borough: **Queens**
- Community District: **14**

Submitted by:

Name: **Glenn DiResto**
Zip: **11692**

I represent:

- **Myself**
- **A local business**
- **A local community group or organization**

Details for "I Represent": **Life Long Resident, Arverne by the Sea Homeowners Association, small business owner**

My Comments:

Vote: I am **other**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

Yes

Additional Comments:

I am not here today to be against the redevelopment of the Peninsula Hospital site or am I here to be against affordable housing or the Arker Companies. However, I am here today as a lifelong resident of Arverne community, a small business owner and civic leader to express my concerns with the current rezoning plan that has been put forth. this is an area of economic and racial segregation and City Planning stated the area already suffers from a high concentration of poverty, high concentration of public and publicly subsidized housing as well as long-term care facilities. These are not my words these are the words of NYC Planning. I

am excited to see what the future holds, but there needs to be adjustments to the plan to ensure the long-term vitality of the neighborhood and this development. Please take the time to review the presentation. Glenn DiResto (917) 587-9609

Rockaway Residents For Responsible Development



**Don't Destroy The Rockaways
With Irresponsible development**

Glenn DiResto

Dear Commissioner,

As a lifelong resident of the Rockaway Peninsula my family goes back in the Arverne community more than 100 years and Rockaway community is extremely important not only to me but to all the residents who have called the Rockaways home for years. The Rockaways is finally becoming a place where people once again want to visit and live and its future has never looked brighter. The development of the former Peninsula Hospital Site (Edgemere Commons) can play a vital role in the continued revitalization of the community, especially the Edgemere, Arverne and Far Rockaway section of the Rockaways which has been economically and racially segregated for years. This economic and racial segregation occurred for many reasons however the biggest is the failed policies of NYC with regards to housing and zoning along with a lack of municipal and private investment. The tide has finally turned, and we now have an opportunity to do something very special that will allow for a community to go from poverty to prosperity while allowing for economic and racial integration without displacement of current residents. However, there are significant changes needed to make this a reality and to ensure a more perfect plan that will mitigate the many SIGNIFIGANT Adverse Impacts listed in the DEIS so current and future residents will have less of a negative impact on their quality of life. In fact, Councilman Donovan Richards in his own words stated he does NOT support the project as it stands, only the concept, and feels certain aspects need to be moderated before he can approve.

Currently the Arker Companies has an “**as of right**” to build ONLY **568 units** of housing. However, they are applying for “**With Action**” discretionary rezoning and are looking to add an additional 1,632 units to the Project Site compared to the “No-Action condition”. The negative impacts to the community within the DEIS are many and would further cause hardships and quality of life issues for current and future residents if the current plan were to be approved as is.

This proposed LARGE-SCALE DEVELOPMENT with 11 buildings, almost all over 12 stories with many as high as 19 stories, containing a TOTAL of **2,200 units of Housing** on a small 9.34-acre plot of land, with ONLY 13% for Moderate- and Middle-income Households would result in much more intensive land use than currently exists and would introduce a substantial new residential population to the study area resulting in increased demand for community facilities and services and only put further strain on the community’s limited infrastructure of schools, public transportation, roadways, healthcare facilities, social services Ect.

Additionally, with only 13% of the units for the forgotten moderate and middle income families the long-term vitality of the community is in question as the city's own studies and reports have shown the area has high concentration of poverty, public housing, subsidized housing, nursing homes and there is a need for market rate units, affordable homeownership and a true mixed income community that this proposal does not address. We understand there is a need for affordable housing around the city but this plan is simply irresponsible as presented and hope you can address this issues in the DEIS with regards development size and balance of incomes as recommended by both Queens Community Board #14 and Queens Borough President.

On June 25th after reviewing the information of the rezoning proposal in the EIS and the presentation from the Arker Companies, Community Board #14 voted to disapprove the rezoning plan by a vote of 28-5 with recommendations with regards to density, better balance of income, schools, parking, ect.

- Did Community Board #14 vote to disapprove the rezoning because they don't want to see anything built at the site? NO!
- Did Community Board #14 vote to disapprove the rezoning because they don't respect the voice of the black and brown residents, as some at the City Planning Commission meeting stated? NO!
- Do people in the community use the word overdevelopment as code word for to many black and brown people in the community? NO

This is NOT a NIMBY! Members of the Community Board #14 including black and brown members from zip code 11691 and 11692 voted overwhelmingly to disapprove the rezoning, check with CB#14 yourself. They did this for no other reason than they are committed residents to the community and they want to see what in the long term best interest for this area of the Peninsula and its residents who have been forgotten about for decades and they want a more perfect plan presented that would minimizes the negative impacts in the DEIS, reduce density, increase parking and provides MORE benefits for the community.

This current plan as presented would go against everything that Community Board #14 voted on two months ago and would also go against everything they voted on during a citywide zoning text amendment not long-ago. Community Board #14 stated that they do NOT support any NEW Affordable Housing be built that is not at least 60% of AMI or greater and the focus be on homeownership and preferably Market rate housing. The Community Board also requested that there be NO reduction in parking requirement on anything that is built. With this current proposal the builder is going against EVERYTHING the community voted against TWO TIMES.

As members of the City Planning Commission you should be very aware the study area for the Peninsula Hospital rezoning OVERLAPS with the **Arverne Urban Renewal Area**, and the **Edgemere Urban Renewal Area**. However, during the environmental review process of the former Peninsula Hospital site (Edgemere Commons) the previous environmental studies mentioned above for Arverne, Edgemere and also the new Far Rockaway Urban Renewal Area were deliberately ignored and there was an Illegal segmentation of the study areas. The study of the development of the Peninsula Hospital site should have studied the cumulative environmental effects in a holistic study that this proposed project would have on the community and revised and or amended the other original plans mentioned, as the subject area overlaps, is adjacent too or in very close proximity to the other Urban Renewal Areas that already had prior studies done when the site was a hospital.

We all should embrace change when it is POSITIVE, and the redevelopment of this site will be an improvement to the community no matter what. The purpose of this is NOT to stop the development of the former Peninsula Hospital site; as we all know responsible development is desperately needed and wanted by the residents of the Rockaways. This is OUR community and we have to live with the results. We need City Planning Commission and Arker Companies to listen to the concerns as a community and go back to the drawing board and come back with a better plan that will benefit the people of the Rockaway community for generations to come.

This important issue is about the future of OUR Rockaway Community.

We Deserve Better!!

Thank You
Glenn DiResto

(SEE BELOW)



Peninsula Hospital

- Peninsula Hospital Closed in 2012
- Sold 2016 to the **Arker Companies**
- Price paid \$19 million
- Owner Peninsula Rockaway Limited Partnership/Peninsula Rockaway Housing Development Fund CORP.
- Plot Size 9.34 Acre site (406,850 Sq Ft)

Density and Surrounding Area

The Arker Companies wants to build “With Action” and add an additional 1,632 units of housing ABOVE their current **“as of right” to build 568 units**. This would make this area the most densely populated portion of the Rockaway Peninsula.

- 11 Buildings
- Many as high as 19 Stories High (Out of character surrounding area/Ocean Bay Apts.)
- 2,200 NEW Units of Housing (Twice the amount of Arverne View Apts)
- 6,500 + NEW Residents (Similar in population Arverne View and Ocean Bay COMBINED)
- 1,500 + School Age Children (No New School and PS/IS 105 is at 112% capacity)
- 734 Residential Parking Spaces (Only 35%)
- ONLY 9.34 Acres of Land

This proposal is slated to **bring at least 6,500+ NEW Residents** to the peninsula **FAR MORE than other developments in area.** It is near other populated developments which are Less Populated and on a **MUCH LARGER land footprint.** Let's put this proposed large-scale development into perspective to get a better understanding of what is being planned.

- **NYCHA Ocean Bay Apartments: 1,395 units** and about **4,000+ residents** on **30+ acres**
- **Arverne View Apartments: 1,093 units** and about **3,500+ residents** on **14 acres.**
- **Nordac Coop Building: 342 units** and about **1,000+ residents** on **7.5 acres**
- **Beach 41st St Houses: 712 units** and about **2,000+ residents** on **13+ acres**

This **“With Action”** Proposed development would have more units and bring in more NEW Residents than Arverne View, Nordac and B41st Houses **COMBINED!!**

This proposed development will dwarf the adjacent 7 and 8 story Ocean Bay Apartments and be far larger than anything that has ever been built in the Rockaways before. We are NOT Astoria, Williamsburg, Downtown Bklyn, or Long Island City. We are an isolated beach community that lacks good schools, adequate healthcare, adequate transportation and good paying local jobs.

We need a development that will not put too much of a burden on our current residents and infrastructure and will promote economic opportunity and economically stabilize the communities housing base. The CURRENT Plan does **NOT** do that.

Current and Future Development Plans

The proposed Peninsula Hospital Development **aka Edgemere Commons** is **ONLY** one development coming to the Rockaways from B69th St to Downtown Far Rockaway. Please see the following information regarding current and future development projects that are also located in the study area and others which are in close proximity or adjacent.

- **Edgemere Urban Renewal Area:** 500 units and approximately 1,515 NEW residents.
- **Arverne East Urban Renewal Area:** 1,200 units and approximately 3,636 NEW Residents.
- **Arverne West Urban Renewal Area:** 800 units and approximately 2,424 NEW Residents
- **Downtown Far Rockaway Urban Renewal Area:** 3,131 units and approximately 9,487 NEW residents

Total Units: 5,631 units and approximately 17,061 NEW residents.

These numbers are *WITHOUT* Peninsula Hospital Site.

- **Peninsula Hospital Site (Edgemere Commons):** 2,200 units and approximately 6,665 NEW residents.

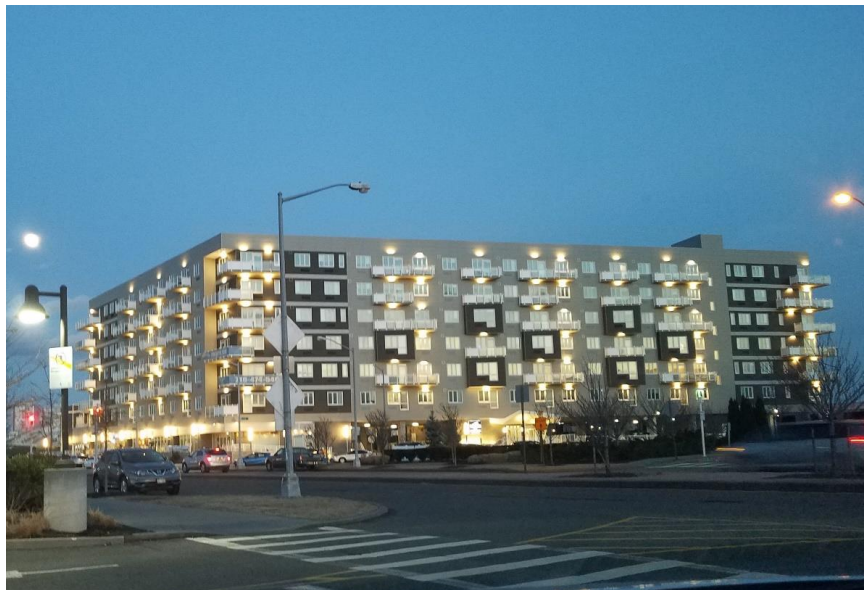
***Grand Total:** 7,831 units and approximately 23,727+
NEW residents in zip code 11692 & 11691*

Rockaway's Affordable Housing Developments

We are not naive and understand there is an affordable housing crisis in NYC and there is a need for affordable housing. In fact, over the last few years the Rockaways has some very successful affordable housing developments which included affordable homeownership which is desperately needed in our community.

Water's Edge Condominium Development: Built less than a decade ago, **131 Units of Affordable Housing Homeownership/Condominiums** in the Beach 60s brought an economic and racial diverse mix of **Moderate-Income First-Time Home buyer families** to the community, economically stabilizing the neighborhood.

Arverne by the Sea: Has been the most successful development to ever come to the Rockaways and has helped transform the Arverne Community from an economically depressed neighborhood with NO economy to a desirable place to live with jobs for the community. It has brought excitement and a mix of families and incomes to the community. Arverne by the Sea contained Market Rate **AND** Affordable Housing up to 120%, and it worked.



Arverne by the Sea, when complete, will be **2,200 units** of housing, the same amount as the proposed Peninsula Hospital Site but it sits on **ALMOST 110 acres**, **NOT 9.35 acres**.

According to the City's **OWN** Studies and Reports that were released not long ago, members of the community and City created the Resilient Edgemere Community Plan where the city stated they will limit new residential developments in vulnerable areas. Additionally, the city and residents prefer **Lower Density Housing** in Coastal Flood Areas and this proposed "With Action" Peninsula Hospital Plan is in contradiction of what the city and community wants.



CREATE RESILIENT HOUSING AND MAINTAIN THE LOW DENSITY FEEL



2. Limit New Residential Development in Vulnerable Areas

The City will limit new housing in vulnerable areas by dedicating City-owned vacant land in the north of Edgemere, along the coast of Jamaica Bay, for non-residential, public uses, such as new open spaces and the development of coastal protection features. The City will amend the Urban Renewal Plan to memorialize this land use change. Concurrently the City will explore zoning and land use tools to limit development on privately owned land in the most vulnerable areas of Edgemere, including parcels north of Norton Avenue, while protecting the rights of current residents and property owners.

Density of Affordable Housing Developments

Far Rockaway Senior Housing:

The Arker Companies has completed a more responsible new senior housing complex at 34-11 Beach Channel Dr. The seven-story building is the first under the city's Senior Affordable Rental Apartments (SARA) program. The 154 units are for low-income seniors, 46 (30%) were reserved for homeless. There is 4,500-square-foot community facility and about 11,000 square feet of retail space.



East New York:

Arker Companies is also building in East New York where they are building **two (2) MID-RISE** buildings with only 200 and 144 **units** of housing.



Why are they only building Mid Rise in an area with lots of jobs near the mall but want to put 19 story high rise buildings here in the Rockaways with limited jobs and economic opportunity for current residents, never mind new residents.

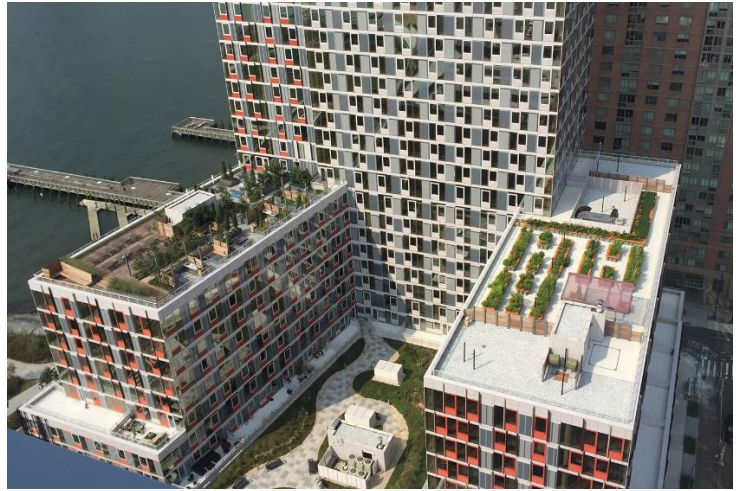
Spaford Redevelopment in the Bronx:

This project is NOT Arker but will include 700 units of affordable housing, ground-floor retail, light industrial manufacturing space and other amenities on 5-acres.



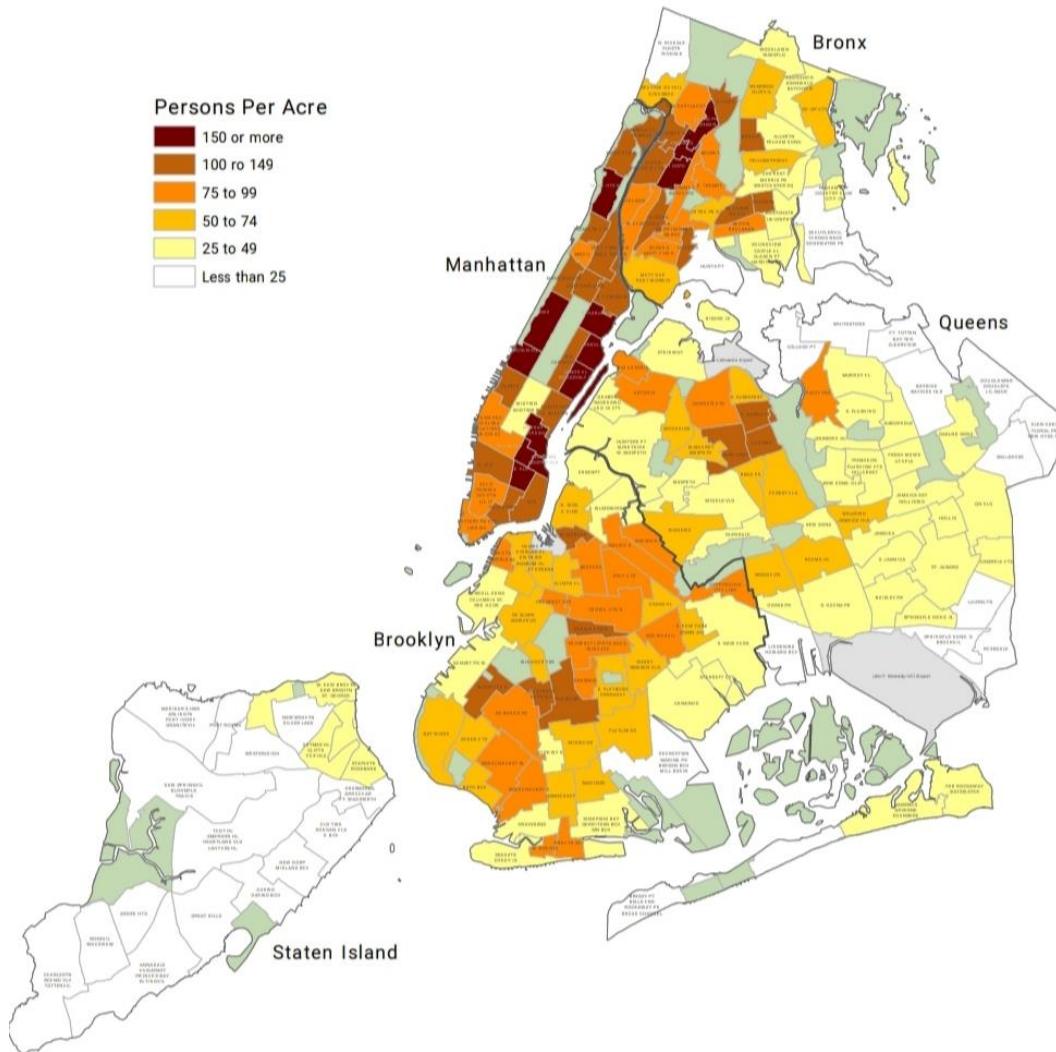
Hunter Point South:

This project is Not Arker but will have up to 5,000 housing units on 30 acres of which **ONLY 60% will be affordable to low/moderate income.** Currently phase II is being constructed and will be a two-towered development with 1,120 apartments total, of which 900 will be designated permanently affordable. Those will be available to residents with incomes ranging from **30 to 145%** of the Area Medium Income (AMI.)



The above information regarding other developments shows the Peninsula Hospital Site plan would be much more densely populated compared to other developments in the Rockaways, and other affordable housing proposals built around the city by the Arker Companies and or other developers. As you can see from the below map the majority of density in NYC is from 25-99 persons per acre. Additionally, when comparing the NYC map on density you can see the area neighborhood density would skyrocket to a ratio of 235 persons per acre which is extremely dense and the map shows.

PL-P2 NTA: Population Density by Neighborhood Tabulation Area*
New York City, 2010



*Neighborhood Tabulation Areas or NTAs, are aggregations of census tracts that are subsets of New York City's 55 Public Use Microdata Areas (PUMAs). Primarily due to these constraints, NTA boundaries and their associated names may not definitively represent neighborhoods.

Source: U.S. Census Bureau, 2000 and 2010 Census Public Law 94-171 Files
Population Division - New York City Department of City Planning

NYCPLANNING
DEPARTMENT OF CITY PLANNING CITY OF NEW YORK

Affordable Housing

The Arker Companies and politicians are trying to sell this to the community as a Mixed Income Development, when it is NOT. **Only 13%** of the units will be available for Moderate & Middle-Income families and 87% will be for Extremely Low, Very Low and Low Income.

According to the Draft Environmental Impact Statement, under Mandatory Inclusionary Housing MIH (**SEE BELOW**) the Arker Companies has a few options available to them when it comes to how many Affordable Housing Units **MUST** be built.

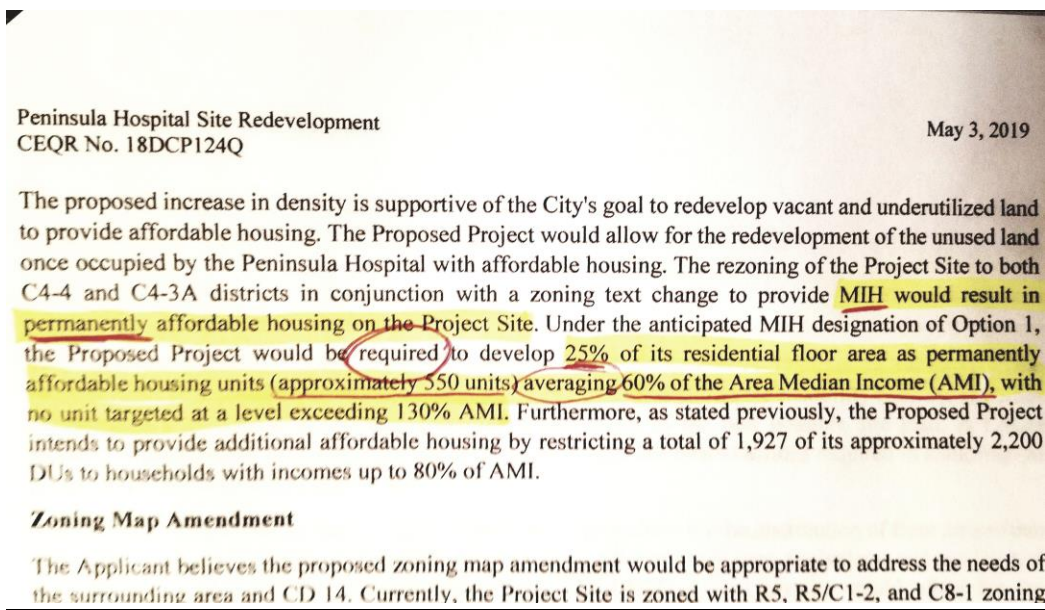
Arker Selected Option #1

Option 1: Would **REQUIRE 25%** of residential floor area (**550 units**) to be permanently affordable for residents with incomes averaging **60% AMI**.

They could go with Option #2 which would build 110 more units of Permanent affordable housing which would provide the development with a better balance of incomes and bring disposable income into the community which is desperately needed to ensure the long-term vitality and stability of the community.

Other Options Available to Builder that should be considered

***Option 2:** Would require 30% of residential floor area (**660 units**) to be permanently affordable for residents with incomes averaging 80% AMI. Much more of what OUR Community needs.





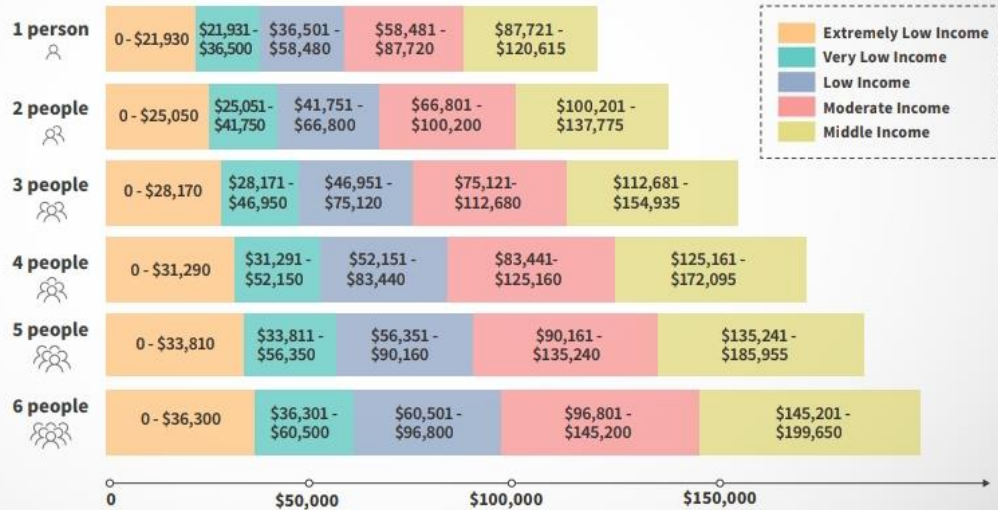
Does my income qualify me for affordable housing ?

NYC creates affordable housing opportunities for households at a wide range of sizes and income levels.

This chart helps explain the income categories that we use, which vary by household size, so you can see where you and your family fit in:

Affordable housing is based on a household's percentage of the area median income (AMI), which is set by the federal government. Housing is considered affordable if it costs about one-third or less of what the people living there make, and is regulated so the rent can't go up dramatically over time. The numbers on this chart reflect 2018 AMI levels.

Eligible Income Levels by Household Size



If your income fits in this chart, register for Housing Connect today so you can apply for housing opportunities that are affordable for you: nyc.gov/housingconnect



Income Band	Percent of AMI
Extremely Low-Income	0-30%
Very Low-Income	31-50%
Low-Income	51-80%
Moderate-Income	81-120%
Middle-Income	120-165%

Of the proposed 2,200 units, 1,910 (87%) are being allocated to the following:

1. Extremely Low Income 0-30% AMI
2. Very Low Income 31-50% AMI
3. Low Income 51-80% AMI

Remember minimum wage is \$15 an hour.

Few different scenarios to show you who qualifies for ONLY 13% of the apartments.

1. Working couple each make a little over minimum wage, \$16.50 hr. they would only qualify for 13% of the units.
2. Single mother MTA worker makes \$60K a year lives with her infant son and mother who collects \$1,500 a month in social security would only qualify for 13% of the units.
3. Married couple police officer and teacher both with 3.5 years employed and have two children would only qualify for 13% of the units.

The people in these scenarios mentioned are not rich, they are struggling new Yorkers and usually make too much to receive any govt assistance or subsidies and are also rent burdened. By only allowing 13% of the units for moderate and middle income families as mentioned and 87% for Extremely Low, Very Low and Low it will only create further concentrated poverty which will further economically and racially segregate the Rockaway community.

Moving more zoning power to the state level has the potential to make a powerful impact on New York's ability to create and preserve affordable housing. But moving to a higher level of government is not sufficient to address segregation: any new land use policy must make a specific effort to undo racial and economic segregation and prevent it from harming the communities it seeks to rebuild. An effective policy must ensure that municipalities do their due diligence to affirmatively further fair housing and do not further exacerbate the poverty and community disinvestment in racially or ethnically concentrated areas. Without an explicit plan for inclusion, we invite history to repeat itself.



Lorraine Y. Collins is the Director of Public Policy and External Affairs at Enterprise Community Partners, Inc. New York Office.

According to a report by the New York City Planning Commission during the Arverne Urban Renewal EIS Calendar No. 2 C 030509 HUQ, **Half of the subsidized housing in Queens was located on the Rockaway Peninsula and construction of additional low and moderate-income housing in Arverne would only increase the proportion. **

IMPORTANT: Just a few years ago, Community Board #14 **OPPOSED** any affordable housing developments that **DID NOT** have AMI of 60% or higher and supported an emphasis be put on **Home Ownership, preferably market rate.**

THIS PROPOSED DEVELOPMENT **DOES NOT** PROVIDE AFFORDABLE HOUSING **HOME OWNERSHIP,** EVEN THOUGH IT IS DESPERATLY NEEDED TO STABALIZE THE AREA.

IMPORTANT INFO from DEIS:

4,107 (83%) of the TOTAL 4,908 dwelling units in study area are publicly funded.

4,076 (93.6%) of the occupied 4,356 dwelling units are renters.

280 (6.4%) of the occupied 4,356 dwelling units are owner occupied.

FROM RECENT NYC PLANNING REPORT: A high concentration of public and publicly subsidized housing and long-term care facilities are also present in the surrounding area.

During the Arverne Urban Renewal Studies the City Planning Commission noted that that over the years the Rockaway has been the site for a number of public housing units and government sponsored partnership housing and that the introduction of market rate housing was needed. The current plan put forth would NOT serve as a balance for the area if only 13% of the units would be for moderate- and middle-income households and 87% would be for low, very low and extremely low-income households. This would NOT be a well-balanced comprehensive planning strategy as it further creates concentrated poverty and would not lead to commercial vitality.

According to an additional report put out on **April 2016** by **Mayor De Blasio's Office of Environmental Remediation**, the following facts apply to the Rockaways:

- Edgemere, Arverne, and Hammels are now home to a fairly dense community with a high proportion of low-income residents. **(Adding more lower income will only exacerbate the issue. There is a need for moderate and middle income families to better balance community incomes)**
- At 16% the unemployment rate of the Hammels-Arverne-Edgemere NTA is more than five percent higher than the rest of the peninsula, Queens (9.6%) and New York City (10.2%). **(Adding 300+ new jobs as in the EIS for 6,500+ New residents won't reduce the unemployment rate)**
- Approximately 30% of residents in the Hammels-Arverne-Edgemere are living in poverty. This represents a much greater share of residents living in poverty than the rest of the peninsula and New York City (20%). **Adding additional lower income housing will NOT fix this problem as most residents are already receiving a subsidy and live in protected housing as per the EIS.**

- The median household income of residents of the Hammels-Arverne-Edgemere is \$39,373. This is significantly less than the median incomes of residents of the Rockaway Peninsula (\$48,171), Queens (\$56,780) and New York City as a whole (\$51,865). **(Bringing in new residents with higher incomes will help strengthen the income levels of the community).**

Bringing in Affordable Homeownership Homes or Condos would help Stabilize the community **WITHOUT** the displacement of current residents

Gentrification

Over the years, gentrification has improved many communities throughout the city however it has become an evil word as it has also displaced many lower income New Yorkers from the same neighborhoods it has improved. Some are concerned if you put homeownership, market rate housing or rentals for the middle class in the area that there will be “**Gentrification**” or displacement of original residents who may have been here for many years. This is **NOT possible** as the Draft Environmental Impact Statement clearly states the following about the subject area.

1. There are 4,908 dwelling units in the studied subject area, 183 (3.5%) of the dwelling units **may** be vulnerable to possible displacement.
2. Almost **85%** of the residential dwelling units in the subject area live in publicly funded housing. **(These residents are subsidized and have protections in place to prevent displacement).**
3. There are 280 owner occupied units (6.5%) in the subject area. **(Not subject to displacement).**

Rent Burden: According to DEIS the population in Queens CB 14 has been increasing, (*Just like every community around the city*) and approximately 44% of households are rent-burdened, meaning they pay more than 30 percent of income toward rent. However, they forgot to mention that the subject area in Rockaway has some of the more reasonable rents in comparison to other areas of the city. And the rent burden is the same as the city wide average, according to the Citizens Budget Commission, which recently released the New York City Housing and Vacancy Survey, which shows that 44% of ALL New York households are rent burdened.

Community Preference Policy

When affordable housing is built, there is a lottery to determine who gets the apartments. In that lottery system there is a policy of the city to provide 50% of the units for residents of the community. This policy is called community preference. I myself have lived in Affordable Housing and it provides residents with a safe affordable place to call home. Whatever is built, we should all want it to serve and benefit current Rockaway residents. However, whether we agree with community preference policy or not, there is currently a lawsuit, pending against the City of New York claiming that the local community preference policy further segregates communities of color and also keeps out prospective lottery applicants of color from white communities in violation of the Fair Housing Act. If they cannot guarantee this community preference to local residents, why is the builder and local politicians promising residents the benefit of community preference when there is a good possibility that our residents may NOT get any community preference?

Health Care

The Draft Environmental Impact Statement states the proposed project would NOT result in the creation of a sizeable new neighborhood where none existed before Consequently, a detailed analysis of indirect effects on health care facilities is NOT warranted. **Are they kidding!!**

How dare they say the proposed project would NOT result in the creation of a sizable new neighborhood. Since when is 6,500+ NEW residents not a sizable new neighborhood?? Look at the OLD EIS With regards to the Arverne & Edgemere Urban Renewal Areas. And now the community has one less hospital.

IMPORTANT: More than 2,600 acute care hospitals were evaluated in the NATIONWIDE Leapfrog Group's spring 2019 hospital safety evaluation. There were nine hospitals that received an "F" grade placing them in the **bottom 1%** of hospitals and of course St. John's Hospital was one of them and was also the ONLY F grade of the 45 NY hospitals graded. This is now the **only acute care hospital in the area.** <https://www.hospitalsafetygrade.org/h/st-johns-episcopal-hospital>

The “**With Action**” plan of Peninsula Hospital site along with all the other new developments planned and being built in the community will bring over 25,000+ new residents and we will have only one failing hospital for a vulnerable and underprivileged community.

Also, according to a report by the NYS Comptroller in March 2018 the average Emergency Room wait before being seen for a diagnostic evaluation is 50 minutes which is **more than twice the statewide average.**

They NEVER did a study/analysis to how this will affect our community!!

Schools

The new proposed development would bring in approximately **1,500 school age children**. Many of the local schools in the Rockaways are already **LOW PERFORMING AND** close to or over 100% capacity. As per city records, The closest school PS/IS 105 on B54th St is at 112% Capacity. Also, local school PS 106 on B35th St is at 134% capacity.

Peninsula Hospital Site Redevelopment
CEQR No: 18DCP124Q

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

Enrollment Projections

As described in Chapter 1, "Project Description," the Proposed Project is anticipated to result in the incremental development of 1,431 non-senior DUs. Based on the CEQR generation rates, the Proposed Project would introduce approximately 444 public elementary school students, 200 public intermediate school students, and 186 public high school students (see **Table 4-6: Public School Threshold Calculations**).

Table 4-6: Public School Threshold Calculations

	Net Increase in DUs from Proposed Project	Multiplier (Students/Unit in Queens*)	Additional Students from Proposed Project	Threshold for Detailed Analysis
Elementary/ Intermediate School Students	1,431	0.31	444	50 (combined)
	1,431	0.14	200	
High School Students	1,432	0.13	186	150

*Source: * SCA "Projected Public School Ratio", released November 2018*

Capacity Changes

The Proposed Project is not anticipated to provide additional capacity on the Project Site for public schools.

Analysis

Elementary Schools

As shown in **Table 4-7: School Enrollment, Capacity, and Utilization for With-Action Condition, 2034**, elementary schools in CSD 27, Sub-district 1 would continue to operate with a shortfall of seats in the 2034 With-Action condition. The sub-district would operate with a 135.21% utilization rate and a deficit of 1,991 seats. The collective utilization rate in the With-Action condition would increase 7.85% from the No-Action condition utilization rate of 127.36%. SEVERE

Since the collective utilization rate for public elementary schools in the With-Action condition would be greater than 100% and the collective utilization rate would increase more than 5% from the No-Action condition, the Proposed Project would result in a significant adverse impact on elementary schools.

Intermediate Schools

As shown in **Table 4-7**, intermediate schools in CSD 27, Sub-district 1 would continue to operate with a shortfall of seats in the 2034 With-Action condition. The sub-district would operate with a 101.58% utilization rate and a deficit of 46 seats. The collective utilization rate in the With-Action condition would increase 6.93% from the No-Action condition utilization rate of 94.65%.

Since the collective utilization rate for public elementary schools in the With-Action condition would be greater than 100% and the collective utilization rate would increase more than 5% from the No-Action condition, the Proposed Project would result in a significant adverse impact on intermediate schools.

If this “**With Action**” plan gets approved by the City Council, it will continue to marginalize the Rockaway community, especially the underprivileged children in the Rockaways’ poorest communities. When this development is complete it will leave a deficit of almost 2,000 elementary school seats (See Above) and the elementary schools will be operating at 135% of capacity. This type of overcrowding leads to poor performing schools and does not provide the children of the Rockaways with the opportunities they deserve.

IMPORTANT: There is NO funding in the current budget or plans to construct a new public school and NYC has reached its MAX on Charter schools. The Draft (EIS) Environmental Impact Statement report even says this proposed development would have **Significant Adverse Impact** on both Elementary AND Intermediate Schools in the Section of the Rockaways, as well as Significant Adverse Impact on publicly funded group childcare AND Head Start centers.

IMPORTANT: We all know local Arverne by the Sea residents were promised a new school **over 12 years ago and they are still waiting for it to be built.**

THE COMMUNITY NEEDS AT LEAST TWO NEW SCHOOLS TO MAKE UP THE SHORTAGE OF THE 2,000 SEATS OR A DRAMATIC REDUCTION IN THE AMOUNT OF UNITS

Transportation:

This Area of the Rockaways has the worst public transportation in ALL of NYC and its residents have the longest commute times of any neighborhood and this is clearly documented in “**An Economic Snapshot of the Rockaways**” (March 2018 <https://www.osc.state.ny.us/osdc/rpt13-2018.pdf>)

Rockaway is very much a vehicle dependent community, not just to commute to work, but to also get around our own community to shop locally and also visit family

& friends across the peninsula, because of the poor public transportation and long commute times.

This **“With Action”** plan would ONLY provide residential parking for 754 units, which is less than 35% when the current zoning would require parking for 85% of the units. As a community that is isolated from the rest of the city and parts of Long Island, we should not allow for any reduction in the current 85% parking requirement.

In addition, the **“With Action”** plan will have a severe adverse impact not only on our roads, but also our subway and bus service. The additional residents would cause significant adverse bus line-haul-related impacts on the Q22 Rockaway Beach Boulevard – Beach Channel Drive bus and the Q52-Select Bus Service (SBS) bus. The Q22 bus would operate above capacity in the westbound direction in the Weekday AM and Weekday PM peak hours, and the Q52 SBS bus would operate above capacity in the northbound direction in the Weekday AM peak hour and in the southbound direction in the Weekday PM peak hour.

NOTE: The proposed with action plan and the other new developments mentioned previously in this presentation will bring **OVER 25,000+ NEW residents to the Rockaways** and create all kinds of direct and indirect transportation issues for current residents across the peninsula.

Economic Opportunities

This development when complete will bring 350 jobs mostly in retail, medical and community space. Currently, there already is very high unemployment in the area and bringing in 6,500+ new residents and creating minimal job opportunity will not correct the high unemployment rate and area median income. In addition to the jobs mentioned there will be a creation of construction jobs. But what kind of jobs, how many? What percentage of locals will be hired? Do the residents have the skill set to do them?? The **“With Action”** approval the developer will get all the funding from the city to build, as well as tax incentives from City, State and Feds. With approval, the builder will make out like a fat rat and the community will be left with the crumbs.

When Stop and Shop in Arverne by the Sea opened, it created roughly 160 part time jobs and the store is 55,000 Sq ft, which is much larger than the proposed Western Beef, which the Arker Companies does not even have a signed agreement with yet.

HPD Development Funding Programs

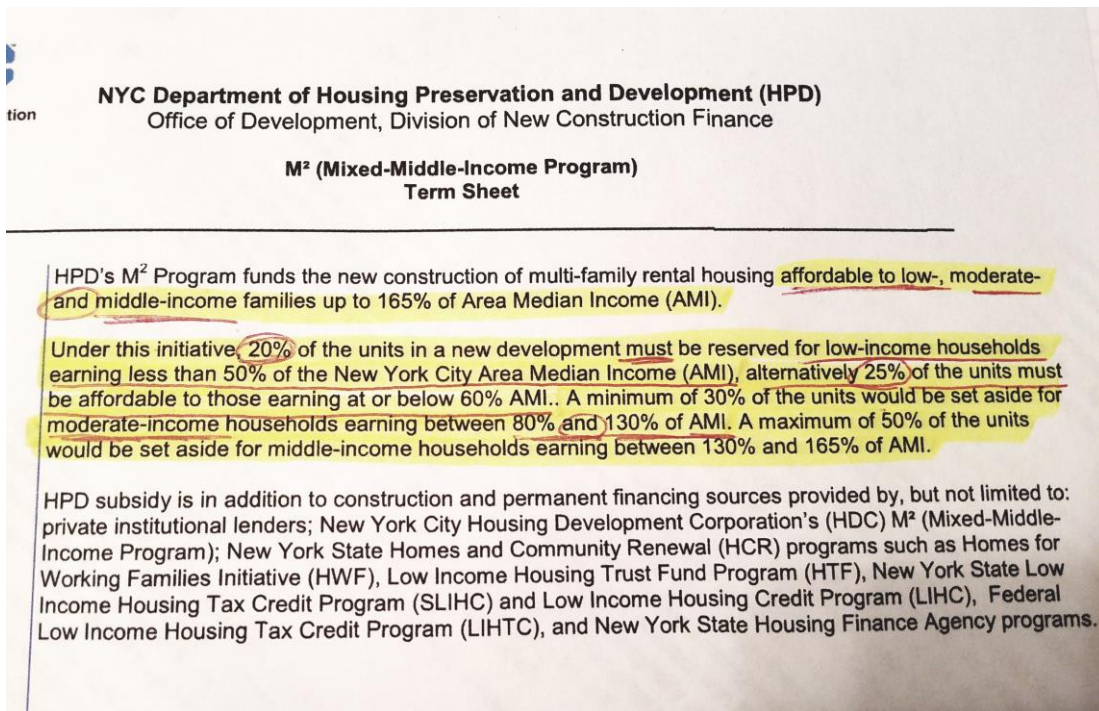
The Arker Companies **MUST** rely on **Taxpayer Funding** from the City of New York to build. There are MANY Housing Preservation & Development (HPD) programs available to builders which provide incentives from NYC to build low income affordable housing. They also have access to other programs which they are NOT taking advantage of.

Arker is looking to secure NYC Taxpayer Funding from the 3 following HPD Programs SARA, ELLA and Mix and Match. There is also other real estate development (HPD) programs and funding sources available to the Arker Companies, **BUT THEY ARE NOT TAKING ADVANTAGE OF THEM, WHY NOT???**

These other programs **BELOW** would better fit the needs of our community by ensuring a **better balance of income** is brought to the community and the development is not mostly geared towards the Extremely Low, Very Low, and Low Incomes (**1,910 units 87%**) as currently being sought. It would also benefit the community if some of the units are Affordable Housing **HOMEOWNERSHIP** as the community board has requested in the past. We **MUST CHALLENGE THEM AND Local Politicians** to ensure they secure some of this other funding programs to ensure there is a much better balance of incomes AND housing units for local residents to purchase.**

Additional Funding That Could Be Secured

A. Mixed Middle Income (M²):



M2 Mixed Middle Income Program: Program funds the new construction of multi-family rental housing affordable to low-, moderate- and middle-income families up to 165% of Area Median Income (AMI). Under this initiative, 20% of the units in a new development must be reserved for low-income households earning less than 50% of the New York City Area Median Income (AMI), with at least 15% of these low-income units set aside for very low-income families earning less than 40% of AMI. A minimum of 30% of the units would be set aside for moderate-income households earning between 80% and 100% of AMI. A maximum of 50% of the units would be set aside for middle-income households earning between 130% and 165% of AMI.

CHECK LINK FOR TERM SHEET. <https://www1.nyc.gov/assets/hpd/downloads/pdf/developers/term-sheets/m2-mixed-middle-income-term-sheet.pdf>

B. New In fill Homeownership Opportunities Program (NIHOP): Promotes the construction of new homes affordable to New York City's workforce community. **CHECK LINK FOR TERM SHEET** <https://www1.nyc.gov/assets/hpd/downloads/pdf/developers/term-sheets/NIHOP-Termsheet.pdf>

C. Neighborhood Construction Program (NCP): Funds the new construction of infill rental housing with up to 30 units affordable to low, moderate- and middle-income households earning up to 165% Area Median Income (AMI). **CLICK LINK FOR TERM SHEET.** <https://www1.nyc.gov/assets/hpd/downloads/pdf/developers/term-sheets/NCP-Termsheet.pdf>

- **Open Door Program:** funds the new construction of cooperative and condominium buildings affordable to moderate- and middle-income households. **CLICK LINK FOR TERM SHEET AND MORE DETAILS:** <https://www1.nyc.gov/assets/hpd/downloads/pdf/developers/term-sheets/open-door-term-sheet.pdf>

IMPORTANT: These Four (4) additional funding programs are available for the developer to take advantage of and would be beneficial to OUR community by allowing more moderate-income families and allowing middle income families to be included as well as making some units affordable housing for purchase WITHOUT Displacement of current local residents.

However, they are choosing to NOT take advantage of these funds. WHY??

I want to thank you for serving as a member of the NYC Planning Commission and taking the time to read and understand the concerns members of the community are trying to convey. We should all embrace change, and we shouldn't be satisfied with the status quo. As reasonable and pragmatic people we understand the city is going to higher density development and there is a need for affordable housing. However, that does NOT mean we should just accept what the developer has presented, because at the end of the day this is a business for them and it's about them making the most money possible and we will have to live with the results and they don't. Yes, we will all be happy to see this land finally developed. Yes, we will be happy to see it will bring retail opportunity and community space. Yes, we should be happy to see there will be affordable housing. However, those positives come with MANY direct and indirect adverse impacts on our residents. I am submitting the below recommendations based on my experience as a lifelong resident of the community, my life experience as a Lieutenant in the NYPD, my experience as the owner of a couple small business in the community, my experience as a Real Estate Broker, my experience as a civic leader and my experience as the Arverne by the Sea Homeowners Association President, I am urging you to ensure that significant changes are made that are in line with the below recommendations and those of Community Board #14 and Queens Borough President to better suit the long term needs of the community and provide true benefits to our residents.

Recommendations:

Density: That no more than 1,363 units be built, as this will be a 140% increase compared to the current as of right and would allow the developer to ensure they can build in a sustainable housing with retail. With this number of units, it will still become the densest section of the peninsula as it is in close proximity and adjacent to Ocean Bay Apartments, Ocean Side Apartments, Nordac Houses, Arverne View, Beach Green Dunes, Beach 41 St Houses, ect.

Affordability: Affordable housing is desperately needed across the city and this development can be 100 % affordable housing and nobody has an issue with that. However as mentioned the area already has a high concentration of poverty, subsidized, public housing, nursing homes and rehabilitation centers.

The area would be better served with Option #2 under Mandatory Inclusionary Housing NOT Option #1 as it would ensure more Permanent Affordable Units and at the same time ensure the LONG-term vitality of the community without the displacement of any current residents. Additionally, the area has already had significant affordable housing built and currently under construction.

Affordable Homeownership: We all know homeownership is the American dream and the key to building wealth. This community is in desperate need of affordable homeownership for many of the residents who want to own their own home and stay in the community they were raised. Affordable Homeownership will stabilize the community and ensure the long term vitality as over 93% of the occupied units in the subject area are renters and 83% of the renters are publicly funded.

Parking: The Rockaways is a unique community due to its geographic location and isolation from the rest of the city. It is also unique in that it borders Long Island and provides limited public transportation to other neighborhoods in Queens, Long Island, Bklyn and other areas of the city. During the 2008 Rockaway rezoning Community Board #14 requested higher parking density than the zoning allowed since we are such an isolated peninsula with limited transportation options to get to work and school. As the Rockaway peninsula grows in popularity especially during the summer months parking is at a premium and by reducing housing density it would solve two major concerns, one of them ensuring there is adequate parking for 60% of the residential units being built which is still less than current zoning which was implemented after 2008 rezoning.

Again, I thank you for your time and if I can be of any assistance or answer any questions with regards to this presentation please feel free to contact me.

Glenn DiResto

(917) 587-9609

From: [PublicComments_DL](#)
To: [Hallah Saleh \(DCP\)](#); [QueensComments_DL](#)
Subject: Comments re: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan
Date: Monday, August 26, 2019 10:53:06 AM

Re. Project: **C 190325 ZMQ - Peninsula Hospital Redevelopment Plan**

- Application Number: **C 190325 ZMQ**
- Project: **Peninsula Hospital Redevelopment Plan**
- Public Hearing Date: **08/14/2019**
- Borough: **Queens**
- Community District: **14**

Submitted by:

Name: **qin chen**
Zip: **11692**

I represent:

- **Myself**
- **A local community group or organization**

Details for "I Represent": **i am hoa board member of a community of homeowners**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

the project is too large of new residents without consideration of public transportation for over 8k new residents, no nearby hospital, insufficient road ways as for all new traffic, and lack of school for new residents.

From: [PublicComments_DL](#)
To: [Hallah Saleh \(DCP\)](#); [QueensComments_DL](#)
Subject: Comments re: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan
Date: Friday, August 23, 2019 4:04:48 PM

Re. Project: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan

- Application Number: **C 190325 ZMQ**
- Project: **Peninsula Hospital Redevelopment Plan**
- Public Hearing Date: **08/14/2019**
- Borough: **Queens**
- Community District: **14**

Submitted by:

Name: **Terence McNicholas**
Zip: **11694**

I represent:

- **A local business**

Details for "I Represent": **Sandcastle Grocery Inc.**

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

As a third generation family business owner serving residents from all over the Rockaways for over 50 years I believe that this project is necessary for the success of Rockaway as a whole and should move forward. That being said I believe it is flawed and could be improved if... 1. The Developer chooses Option 2 under MIH 2. That the project is built to a slightly lower density around 1,750 units 3. The project targeted a wider range of income levels that might attract new residents to the area who can stimulate and maintain a local economy where one has struggled to develop in the past. For too long Rockaway has suffered from neglectful government policy that has hurled some of NYC's most challenged residents into a landscape that has lacked the access to opportunity and the necessary resources to build pathways to independence. There is no doubt that this new development should protect generations of Edgemere residents by offering affordable housing but it should also help to build a lasting

community that is racially and economically diverse.



August 12, 2019

Marisa Lago, Chairperson
City Planning Commission
Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

Re: Peninsula Hospital Redevelopment Project

Chairperson Lago,

I am the Founder & President of MPAC (Mobilizing Preachers and Communities) representing 500 churches in New York State from Buffalo to Brooklyn. I'm also the senior Pastor of Mount Neboh Baptist Church in the Village of Harlem.

Let's get right to the point. I am writing to express our support of the new mixed-use housing campus proposed for the former Peninsula Hospital site in Edgemere. The proposal will allow the development of 2,200 mixed-income dwelling units, community facilities, supermarket, retail, business incubators, and much more. The proposed redevelopment will be a positive game changer for the residents of Far Rockaway and beyond, bringing new life, vitality, and a host of entrepreneurial opportunities for local residents.

In my conclusion, this redevelopment is good for our neighborhood,. We will turn a flood-prone empty space into a flood-proof public square. On behalf of all the members of MPAC on the Peninsula we fully support and welcome this proposed plan.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Johnnie Green', with a long horizontal flourish extending to the right.

Rev. Dr. Johnnie Green
President of MPAC

Good morning, my name is Isaura Gonzalez. I Am 17 years old and I am going into my senior year this September.

I support the peninsula redevelopment project for Edgemere Commons because It is apparent that there is a need for affordable housing on the east end of the Rockaway peninsula.

Instead of going forward, in many ways we are going backwards and rent is increasing for many people.

I came to the United States from Dominican Republic when I was 9 years old. When my family first got to the country we were living in my grandmas spare room. So that was 6 people. My parents, my 3 siblings and myself all in one room. (6.5 if you count our dog). We lived there and then we move to our own place.

The responsibility of rent fall into my mom. She was the only source of income for many years. My mom works 2 jobs. And many times she's worriedthe rent, or the credit car bills. It is all incredibly exhausting, she goes from one job from 10:00 AM to 4:30 PM, and starts another shift at 5:30 PM to 10:30, but sometimes, more often than not she will stay later. Perhaps to midnight, 2:30, or even in some cases 5:00 AM.

My siblings work a part time job, my mom has allowed for my sister save enough money to get a car. And despite how hard it is to for years shes been saving to buy a house and she would continue to save for many years.

In 8 years I have fallen in love with the Rockaway community. I was basically raised here. I learned english in Rockaway, I made friends in Rockaway, I to studied in Rockaway. I would not be the person I am today if I didn't grow up in Rockaway.

Living in Far Rockaway is not easy. I have to commute 2 hours to go to my highschool. I'm probably going to have to commute for college or internships. Rockaway is a food desert, there's not a lot of food choices. Despite all of those negatives, and there's more I want to keep living here and working for a better community.

I see a future in the peninsula. But the cost of living is too high.

But I just think of how my financial situation is going to be when I finish college. I don't see how realistic it would be for me to live in Rockaway. I don't know if im going to be able to afford rent unless we have developments like this one.

I have many family members that talk about moving to other states. But I simply don't want to have to move.

So I ask you to please vote yes on this project.

Start off with - "Hello, good morning. My name is Anaya and I am 13 years old. I would like to thank everyone for having me today to be able to share my opinion/side on affordable housing. I believe it is a right for everyone to have a home no matter what their status, race/ethnicity, gender identity/expression, country of origin, their sexuality, and income. It is a basic human right for a human to live in a home that does not have horrible living conditions such as no heat during the winter, no access to clean water, leaky pipes, and lead poisoning."

Factual evidence Statement - "According to the National Alliance to End Homelessness, 62,601 people in 2007 were homeless. In 2013, there was a dramatic increase to 77,430 people. Then soon enough, in 2018, it increased to 91,897 people. Unfortunately, out of that 91,897 people, 52,070 people were families. And it's no wonder why there are overcrowding shelters in NYC. And see, putting them out on the street is even worse. Exposing them to disease, extreme weather, and crime. And that's the issue. That is the underlying issue. That is why we need affordable housing. I'm not saying that housing should be free. That's not what anyone is saying. We are saying that no family who can't afford the \$100,000 a year income deserves to be on the street. They deserve to live comfortably in our city."

Closing Statement - "You can fix this, if you give it a chance. You can give families a second chance at life. As the City Planning Commission, you can change my community for the better by voting yes on the Peninsula project. Make New York City the city of dreams. The city that I would like to come back to after university. The city that many others won't have to worry about their housing status. The city where me and my peers can live together. Without bias."

Peninsula Hospital Redevelopment Site: City Planning Commissions Meeting

My name is Tamera Jacobs, I'm a resident of the Rockaway Peninsula. The Rockaways is racially and economically segregated. The black and brown communities in the east end of Rockaway has been historically underfunded and neglected.

We deserve to have the resources and services necessary to live comfortably. We deserve affordable housing that allows for upward mobility. This project not only brings housing but also jobs, recreational centers, restaurants, creating a vibrant and sustainable community for our residents.

At the recent community board 14 special meeting, the community spoke overwhelmingly in favor of the project. We do not agree with boards decisions, as the voices of the community directly impacted were not taken into account.

It is important and necessary that the individuals directly impacted by the redevelopment of the peninsula hospital site be apart of the conversations and have a seat at the decision making table. Without the intentional involvement of these individuals, the project with not benefit the immediate community, but rather create greater problems.



SEIU 32BJ Testimony
Testifying on Vernon Blvd. Rezoning
Wednesday, August 14, 2019
City Planning Commission

Good morning Chair Lago and members of the Commission. My name is Louise Bordley. I'm a security officer at City Bank in Long Island City and have been a member of SEIU Local 32BJ for 4 and a half years. I am here today as a resident and worker in Queens community district 1, and on behalf of my union to share our support of this project. *I live one block away from the*

32BJ represents about 45 hundred members who live and work in Queens community district 1. As residents and members, we take new developments in our neighborhoods seriously. New projects should come with community benefits like affordable housing and jobs that pay the prevailing wage. I am happy to report that Cipico Construction Inc, the developer for this project, has made a credible commitment to provide prevailing wage jobs for the future building service workers at this site. *proposed site development site.*

This project will also come with other significant community benefits such as, open space available to the public, community facility space, and ~~105~~ *92* units of much-needed permanent affordable housing on the East River Waterfront.

We see this as an example of responsible development and respectfully urge you to approve this project.

Thank you.

My name is Andrea Colon. I am the lead organizer with the Rockaway Youth Task Force. I was born and raised in Far Rockaway. It is not a secret that Rockaway is racially and economically segregated. The east end which is predominantly Black and Brown, does not have the same resources and services that the west end does. "Overdevelopment" is code for too many people of color. There have been people who are very vocal and taking up space about this project which will not impact them.

As someone who grew up below the federal poverty line, I grew up believing that being poor meant living in bad conditions; lack of heat and hot water for periods of time, brown water, rats, roaches, etc. Now, as a community organizer, I recognize that that narrative is false and problematic. People deserve to live in decent housing that they are proud of. Affordable shouldn't mean deplorable. The Edgemere Commons project would combat that narrative by giving Rockaway residents a place to live that we are proud of.

I will be graduating college in 2 years. As the cost of living goes up every year, I worry about where I will live after I graduate. I love my community but how can I stay if there's a lack of affordable housing. I urge you to vote yes on this project.

We deserve affordable housing that allows for upward mobility in our communities. We deserve a healthy, thriving economy. Listen to the residents of the east end of the peninsula, who is most impacted by poverty and homelessness, when we say we need affordable housing. Decent affordable housing as a human right shouldn't be up for debate.



Community Church of Astoria

Reverend Corwin S. Mason, Pastor

Deacon James Hudson, Chairman of Deacon & Trustee Board
Sister Norma Harris, Chairperson of Church
Sister Ronda Layne-Judge, Church Treasurer
Sister Margie Conner, Church Secretary

August 12, 2019

Marisa Lago, Chairperson
City Planning Commission
Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271
Re: Peninsula Hospital Redevelopment Project

Dear Chairperson Lago,

My name is Corwin S. Mason I am the Pastor of Community Church of Astoria. I am writing to express my support for the Peninsula Hospital redevelopment project in Far Rockaway, NY. I'm particularly interested in this project because a number of my members live in Far Rockaway, and since Super Storm Sandy their living conditions have been more than challenging, so this development gives hope to those people in my congregation.

The redevelopment of the Peninsula Hospital will meet a variety of community needs including a supermarket, retail shops, restaurants and housing. The placement is beneficial for residents in giving them access to an affordable grocery store as well as new job opportunities.

The project will create new affordable housing opportunities that are greatly needed in our neighborhood. The developer has committed to working with 32BJ SEIU to ensure good paying jobs for building service workers. Those job opportunities and permanently affordable housing units will improve the lives of residents of Far Rockaway.

I therefore fully support the proposed rezoning and request the Peninsula Hospital Redevelopment Project be approved.

Thank you for this opportunity to express my support regarding this project.

In His Service,

Reverend Corwin S. Mason

Reverend Corwin S. Mason



First Baptist Church

100 -10 Astoria Blvd., E. Elmhurst, NY 11369
Phone: 718.446.0200 /0481 Fax 718.565.6115

Reverend Patrick H. Young, Pastor
E-mail: firstbaptistchurch.fbc@gmail.com

August 12, 2019

Marisa Lago, Chairperson
City Planning Commission
Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

Re: Peninsula Hospital Redevelopment

Dear Chairperson Lago:

I am the Senior Pastor of First Baptist Church and the general secretary for MPAC - Mobilizing Preachers and Communities. I am writing to express my support to redevelop the former Peninsula Hospital campus. The project will be life changing to those living and working in this community. This new development will bring good jobs, supermarket, mixed-income housing, a playground for children and open community and retail space.

This building project will create new housing opportunities which our neighborhood greatly needs. I have members who live in the area and are looking forward to those mixed-income units being available to them. The developer has committed to building a first class, live, work, and enjoy destination for the folks in Edgemere and beyond. Overall, the mixed-income housing units, good jobs, and food and restaurant development will greatly benefit the neighborhood and the City.

We therefore fully support the proposed rezoning and request that it be approved.

In His Service,

Rev. Patrick Young
Senior Pastor

WOODSIDE TENANTS ASSOCIATION

August 12, 2019

Marisa Lago, Chairperson
City Planning Commission
Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

Re: Peninsula Hospital Redevelopment Project

Dear Chairperson Lago,

Good morning, I'm Annie Cotton Morris, President of the Woodside Tenants Association and President of the Queens Council of Presidents for the New York City Housing Authority.

I am writing to express my support of a new mixed-use housing campus proposed for the former Peninsula Hospital site in Edgemere. The proposal to redevelop this site will greatly enhance this community. This project will yield good jobs during construction each year and approximately 650 permanent job opportunities upon completion. The development will also include approximately 2,200 mixed housing units and a much needed supermarket.

Redeveloping the Peninsula Hospital site will create new mixed housing opportunities that is greatly needed in the neighborhood. The developer has committed to working with 32BJ SEIU to ensure good paying jobs for building service workers. . The neighborhood, especially residents of Far Rockaway who have been overlooked and underserved will prosper with this new development.

I therefore fully support the proposed redevelopment and request that it be approved.

Sincerely,



Ann Cotton Morris
President of Queens Council
Of Presidents for NYCHA

Macedonia Baptist Church

330 Beach 67th Street Arverne, NY

August 12, 2019

Marisa Lago, Chairperson
City Planning Commission
Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271
Re: Peninsula Hospital Redevelopment Project

Dear Chairperson Lago,

I am the Senior Pastor of the Macedonia Baptist Church in Arverne. I've had the privilege of Pastoring in Far Rockaway for 28 years and I also live here. I have seen our peninsula get left behind by the rest of the City. We are often overlooked and neglected because of our location. Most people in New York didn't have a clue of the depth of poverty that exist in Far Rockaway until Super Storm Sandy. My church, along with many other churches, homes and businesses suffered serious devastation.

As you know we have the best beaches around, and since Sandy, we have come back stronger and more resilient in some neighborhoods. Edgemere, unfortunately has not seen the investment and success that other areas of the Rockaways have. Just look at Arverne by the Sea, beautiful but unaffordable to the people I serve and live in the Rockaway's. The old Peninsula Hospital in the heart of Edgemere has been shuttered for seven years, and currently, the lot is an eyesore. That empty area not only contributes nothing to the community but it also deters those that would want to do business here. But there is hope. A planned new development to bring mixed income housing, restaurants, a supermarket, new streets, and more business is hopefully on the way.

The planned development would bring much needed housing, and everyone I speak to is excited about that. Before Edgemere can change, someone has to take a chance to inspire others to come here. This planned development has all the components necessary to build a vibrant community. We are already being teased with long awaited and much needed new neighbors, such as Western Beef, who has agreed to be the main anchor tenant on Beach Channel Drive. With each subsequent year, more retailers are going to be able to open a shop or restaurant here and finally survive. This planned project will offer long overdue consumers for Edgemere businesses to finally thrive. Overall, the Peninsula Hospital redevelopment will bring \$985 million in direct spending to build the new site.

We are in favor of the redevelopment of the Peninsula Hospital project. This proposed new mixed-use campus will provide job opportunities, new business development, and healthy food options for the residents on the peninsula.

Respectfully,

Rev. Evan Gray
Senior Pastor

Mount Horeb Baptist Church

109-20 Edward E. Jarvis Drive
Corona, NY 11368

August 12, 2019

Marisa Lago, Chairperson
City Planning Commission
Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271
Re: Peninsula Hospital Redevelopment Project

Dear Chairperson Lago,

I am writing on behalf of the members Mt. Horeb Baptist Church in Queens, and the Moderator for The Eastern Baptist Association; comprised of over 200 churches many of which are located right in Far Rockaway. I've heard the voice our people and they are overwhelmingly in favor of the redevelopment of the Peninsula Hospital project. This proposed new mixed-use campus will provide much needed housing, job opportunities, new business development, and healthy food options for the residents on the peninsula.

The redevelopment of this land will create new housing opportunities that are greatly needed in our neighborhood. The developer has committed to working with the unions to ensure that good paying jobs will be available for building service workers. These opportunities of housing and employment benefit the lives of all the residents of Queens.

I therefore fully support the proposed redevelopment and request that it be approved.

Respectfully,



Rev. Gilbert Pickett
Senior Pastor
Mt Horeb Baptist Church
Moderator at Large

Dr. Williams
City Planning Commission
August 14, 2019

- Good morning everyone; it's great to be here this evening to discuss a plan that I believe will improve the future resiliency of Far Rockaway.
- As we learned seven years ago, the threat of another Superstorm like Hurricane Sandy wreaking havoc on our neighborhood still looms.
 - All of us lost something on that day, and we should take the necessary steps as a community to prevent something like that from happening again.
- As the CEO of *Ready Rockaway* – a local disaster and emergency management services company – I saw first-hand how difficult it was to repair the damage left behind in the storm's wake, and ever since then, I have studied different approaches that could be used to absorb the impact of another climate event.
- Thankfully, we have a new opportunity to tackle resiliency and economic development in our neighborhood, and it starts with revitalizing the old Peninsula Hospital Site.
- The developer, Arker, has been listening to community needs and is advancing a plan that will boost our economy and bring a renewed focus on innovative resiliency by constructing bioswales, bioretention rainwater systems, solar panels, green roofs, and new and improved green and gray water infrastructure.
 - While the City has provided funds for flood protection, it simply is not enough for long-term protection.
 - However, these million-dollar investments from the developer in resiliency will help sustain our long-term preparedness by elevating several streets above floodplain levels and providing standby generators with emergency outlets for all buildings.

- There will also be spaces at the new development that will be powered by backup generators and available to the residents of the community to seek safety in case of a storm.
- The key to protecting the Far Rockaways is with a substantial public-private partnership, which is what is happening right now as we move forward with this plan.
 - This successful partnership can be used as a model for future development
- With the future of Far Rockaway at stake, we can't afford to wait until the next storm to take action and protect ourselves; we have to start building upon our resiliency right now.
- I strongly support the project to breathe new life in the old Peninsula Hospital site, and I urge the board to continue working with the developer, who has shown a serious commitment to the future of Far Rockaway, so that we can advance a project that will revitalize the surrounding neighborhood. Thank you for listening; let's get this project done!

August 14, 2019

Testimony to DCP

Given by Danielle Aristy of Western Beef Retail, Inc.

At Western Beef, we have over 30 years of experience in operating successful supermarkets across New York. Before any new store is opened, we use our retail expertise to perform our due diligence to ensure the community can sustain a new store, which is what we have done here in the Rockaways as well.

We are excited to be part of this project, particularly because we see the commitment and enthusiasm from the development team to have the voice of local residents at the heart of the project. In our early conversations with the team, we provided our thoughts on the plan's commercial space and its viability. We also provided suggestions to ensure it reaches its full potential – they were incredibly responsive and true partners as we made adjustments to ensure wider success for the community.

From our perspective, we felt that a direct access parking lot was critical in order to create a space that works for Western Beef and will allow the local residents to get the most out of a new supermarket. We worked with the development team to identify how this could be incorporated into the plan while maintaining the cohesive nature of the overall site. The planned open parking area available for customers on Beach Channel Drive will also welcome everyone as they are passing down the major thoroughfare creating a true anchor site for Edgemere Commons.

A unique perspective that Western Beef brings to the table is our understanding of the outer boroughs; the parts of the city that do not look or operate like Manhattan or downtown Brooklyn. These more suburban areas of the City are a demographic mix of public transit dependent families and daily car users. This is particularly of note for grocery shopping.

Within the grocery industry, Western Beef prides itself on supporting diverse communities with quality affordably priced products, so that families can rely on us

for their year-round shopping. We also offer residents the opportunity to purchase bulk quantities on many items to save money. We have seen throughout our New York stores that this bulk buying option is wildly popular, but it is really only possible with a car, which is another key reason we felt the store in this area necessitated the open public parking lot.

Food deserts are a serious problem in less dense areas and Western Beef has long been focused on providing quality, affordable fresh meat and produce for these communities. We have been at the table with the Arker Companies for several months and feel confident that as currently designed our store will be a great asset to Edgemere and a successful tenant for the overall project.

We are committed to supporting local communities. This project, with its mixed-income housing and diverse retail offerings, will be a long-awaited transformation for the area. We hope to further this transformation along by hiring local residents and expect to have approximately 100 jobs to fill ranging from cashier to store manager.

Western Beef's corporate model is to find success through partnering with our neighborhoods and with Edgemere Commons, we believe this plan will rightly support the growth of Edgemere and benefit all.

~~Good morning.~~ My name is Bridget Klapinski. I'm a resident of the Rockaways. ~~My name is Bridget Klapinski. I'm a resident of the Rockaways.~~

I have attended

presentations by Arker Companies ~~in our community~~ and attended

and

hearings on ~~the~~ ^{this} proposed redevelopment ~~of the Peninsula Hospital site,~~

~~both~~ at Community Board 14 and the Queens Borough President's

office. It is SHOCKING that in the EIS, there is ~~very~~ little mention of

Hurricane Sandy --- when in fact, what we learned ~~through that storm~~ ^{then}

must

~~should~~ inform every decision on the Rockaway Peninsula, ~~and~~

~~surrounding areas,~~ especially ^{regarding} residential development.

I'm here to ~~share~~ ^{share} what our community looked like in the days ~~weeks~~

and months after ~~the~~ Sandy. We could not get food, for weeks,

except ~~that being~~ ^{what was} brought in by civilian volunteers. The same ~~was true~~ ^{with}

~~for~~ medical supplies, basic hygiene products and other necessities.

Almost every resident who had a car at street level during the storm

lost it to the flood waters. The A Train was completely out of service

for months, ~~for many,~~ ^{many} effectively stranding ~~them~~ on the peninsula. We

experienced loss of property, and for some, loss of life. It is

unfathomable that we are contemplating situating THOUSANDS of new residents in this extremely vulnerable ~~community~~ community, ~~in~~ a flood plain ~~separately bordered by Jamaica Bay and the Atlantic Ocean~~, where ~~many~~ many residents are STILL not repaired from that storm and unprepared to face the next one. ~~We are already seeing the effects of climate change and sea level rise.~~ The city's own ~~community~~ plan entitled "Resilient Edgemere" states, "Edgemere is vulnerable to many types of flooding: floods from coastal inundation but also flooding associated with heavy rain and high tide. While new traditional sewers are under construction in the community, the low-lying topography, high groundwater, and tidal influence in the neighborhood prevent the area from draining quickly. This issue is projected to worsen as sea level rise increases the frequency of tidal flooding, which temporarily decreases the capacity of the sewers to drain streets." We ~~are already~~

see this already, ~~in 2019~~, with ~~monthly~~ ^{regular} high tides and ~~heavy rain~~ ^{heavy rain} ~~draining~~ ^{draining} ~~rainwater~~

--- ~~which~~ ^{ing} renders streets impassable. The city's own ~~models~~ ^{models} predict "SUNNY DAY FLOODING" in much of the area by 2050, ~~while~~ ^{while}

Climate Change

~~1/24/19 @ 3:15 PM~~ We are seeing the effects NOW. And while

Arker has outlined resiliency measures for its OWN property, the

surrounding area ~~immediate and peri-urban wide~~ is unprepared and

underserved by infrastructure. We ~~are facing~~ ^{face} enormous challenges

with access to functional streets, transportation & parking, schools and

hospital ~~facilities~~. To situation thousands of ~~new~~ individuals and

families in a high density residential project ~~in this area~~ ^{at this site} is foolhardy at

best, and reckless at worst. There WILL be a next storm. ~~Probably~~

~~soon that we think~~. The approaching 2019 Hurricane Season is

forecasted to be very active. I ~~am calling~~ ^{call} upon City Planning to ~~consider~~

~~this and~~ prioritize the safety ~~and well-being~~ of all current and future

residents in considering this plan and its impacts, ~~and the existing~~ ^{allowing ONLY what is current zoned} "as of right."

~~community and environment~~. Even if the Arker buildings withstand

~~future~~ storms & flooding events, ~~what will their impact be on the~~

~~surrounding neighborhood?~~ We ALL need access to very scarce

resources, especially in the aftermath of a storm. And with Arker's

proposal to fill and elevate its own site, creating something called

(4)

"Highpoint Plaza" – what will this do to the surrounding streets and homes ~~development~~ during storms?

Any displaced water must go SOMEWHERE – especially

~~when it rains~~ from storm surge. This design sounds like it will turn

the surrounding neighborhood into a moat. It is incumbent upon the

City to consider ~~this~~ this. A development of this ~~proposed~~ scale, at

this site, will ~~surely~~ imperil many more New Yorkers during the next

storm and make their recovery so much more difficult in the aftermath.

I was lucky to survive Hurricane Sandy, but I wouldn't wish that

experience on anyone. I can't believe the City is contemplating

allowing ~~any~~ ^{large-scale residential} development at this site, without addressing the myriad

~~problems and~~ vulnerabilities that already exist. ~~in the Draft EIS,~~

~~"unmitigated" is a word that seemed to recur.~~ The ~~Draft~~ EIS

ACKNOWLEDGES adverse impacts ~~with regard~~ to OPEN SPACE, NOISE, SCHOOLS

and ~~much~~ more – in many instances, "unmitigated" or without a

solution in sight. To compound these problems, with current and

future residents suffering the consequences, is unimaginable. We

might not be able to prevent Climate Change or the next storm, but we

are responsible for the number of New Yorkers that we imperil by putting them on very front lines of it. Thank you for your time.

From: [PublicComments_DL](#)
To: [Hallah Saleh \(DCP\)](#); [QueensComments_DL](#)
Subject: Comments re: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan
Date: Friday, August 23, 2019 9:32:50 AM

Re. Project: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan

- Application Number: **C 190325 ZMQ**
- Project: **Peninsula Hospital Redevelopment Plan**
- Public Hearing Date: **08/14/2019**
- Borough: **Queens**
- Community District: **14**

Submitted by:

Name: **Edward Mallon**
Zip: **11692**

I represent:

- **Myself**

Details for "I Represent": **Rockaway resident**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

The project will only create a problem for the people who live in the new buildings and the community of Rockaway. Too many people in too small an area with no schools or low performing ones, limited health facilities, virtually no jobs after construction for the residents, and the mix of very low incomes instead of more middle class incomes indicates that the project may become another crime ridden ghetto where the poor have to live with the desperate. Too many people for the area. The project should be cut in half and fit into the existing community that is moving up not down. Help the low income families by mixing them with middle income families to have a healthy community.

From: [PublicComments_DL](#)
To: [Hallah Saleh \(DCP\)](#); [QueensComments_DL](#)
Subject: Comments re: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan
Date: Friday, August 23, 2019 8:47:49 PM

Re. Project: **C 190325 ZMQ - Peninsula Hospital Redevelopment Plan**

- Application Number: **C 190325 ZMQ**
- Project: **Peninsula Hospital Redevelopment Plan**
- Public Hearing Date: **08/14/2019**
- Borough: **Queens**
- Community District: **14**

Submitted by:

Name: **Luis GUERRERO**
Zip: **11691**

I represent:

- **Myself**

Details for “I Represent”: **Our Community Council and City Council Members are supposed to represent us by addressing issues and facilitating solutions but what my Community is seeing is proposed reckless expansion without consideration of the impact it will have on our community and their constituents. With all this development, where is the infrastructure (schools, utilities, transportation, medical facilities, additional First Responders, etc.) to support all this expansion? Where's the social support structure such as parks, community and senior centers, youth programs, etc. that promote a healthy community? Where are the jobs and youth development (both vocational and recreational) that minimize crime and gang activities? All I see is greed and more greed. Our Elected Officials, Community Leaders and Developers are pissing down our backs and telling us it's raining. We cannot allow The Rockaways to continue to suffer from the exploitive and debilitating Curse Of Robert Moses. We have been the City and States political dumping site and playground for exploitation for over 50 years. It's time to nurture the Rockaways. Use our resources and establish economic and social growth that can turn us into a Long Beach or an Island Park.**

My Comments:

Vote: I am **other**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

Our Community Council and City Council Members are supposed to represent us by addressing issues and facilitating solutions but what my Community is seeing is proposed reckless expansion without consideration of the impact it will have on our community and their constituents. With all this development, where is the infrastructure (schools, utilities, transportation, medical facilities, additional First Responders, etc.) to support all this expansion? Where's the social support structure such as parks, community and senior centers, youth programs, etc. that promote a healthy community? Where are the jobs and youth development (both vocational and recreational) that minimize crime and gang activities? All I see is greed and more greed. Our Elected Officials, Community Leaders and Developers are pissing down our backs and telling us it's raining. We cannot allow The Rockaways to continue to suffer from the exploitive and debilitating Curse Of Robert Moses. We have been the City and States political dumping site and playground for exploitation for over 50 years. It's time to nurture the Rockaways. Use our resources and establish economic and social growth that can turn us into a Long Beach or an Island Park.

From: [PublicComments_DL](#)
To: [Hallah Saleh \(DCP\)](#); [QueensComments_DL](#)
Subject: Comments re: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan
Date: Sunday, August 25, 2019 8:26:34 PM
Attachments: [PHC redevelopment.docx](#)

Re. Project: C 190325 ZMQ - Peninsula Hospital Redevelopment Plan

- Application Number: **C 190325 ZMQ**
- Project: **Peninsula Hospital Redevelopment Plan**
- Public Hearing Date: **08/14/2019**
- Borough: **Queens**
- Community District: **14**

Submitted by:

Name: **Elisa Hinken**
Zip: **11559-0302**

I represent:

- **Myself**
- **Other**

Details for "I Represent": **I have business interests in the Rockaways**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

Please see my attached comments