



Community Board No. 2

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January 19, 2018

Robert Dobruskin, Director
New York City Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

BY FIRST CLASS MAIL AND E-MAIL (rdobrus@planning.nyc.gov)

Re: ANABLE BASIN REZONING PROPOSAL
- CEQR No. 18DCP057Q9
- Comments on Draft Environmental Impact Statement

Dear Mr. Dobruskin,

We have set forth below the comments of Community Board 2, Borough of Queens (“CB2”) with respect to the environmental impact statement (“the EIS”) to be prepared in connection with the proposed Anable Basin re-zoning and other discretionary actions (“the Proposed Actions”) sought by Design Center Realty, LLC (“the Applicant”), and the many serious and impactful issues therein that must be addressed.

We are mindful in doing so that these comments should be limited to the scope of the work for the EIS and any changes deemed necessary to ensure that appropriate, thorough, and detailed assessments of all potential impacts are included. However, we are constrained to comment that the abbreviated timeframe following the provision of your Public Notice Of A Scoping Meeting dated November 14, 2017, even as modestly extended to today, has negatively affected our ability to solicit and obtain the most complete and comprehensive input from our community that we deem necessary to the provision of the kind of comprehensive and thoroughly informed commentary that matters of such enormous community impacts require, and that the final scope of work to be issued by your agency demands.

CB2 has a long and historic record of leadership and involvement in many innovative and large scale rezoning projects such as Queens West, Hunters Point South, the Court Square

Sub-District, Queens Plaza Sub-District, the Jackson Avenue Corridor, Sunnyside and Woodside rezonings, Silvercup Studios, and many more.

We fully understand the need for careful, thoughtful deliberation and input from all members of the community which is essential in considering negative impacts and unintended consequences of any project. We are members of local community organizations, neighborhood residents, employees, business owners and artists. Our concerns are well documented and based on our experience of the impacts in a rapidly changing community.

We are not opposed to development, but have sought to build an economically diverse, 24-hour, sustainable community; to encourage business development; mitigate both residential and business tenant displacement; protect existing businesses; support living wage jobs; protect the community from construction related hazards; ensure that municipal services and community facilities maintain the pace of development; enable school aged children to thrive and ensure families don't have to move because there aren't school seats, medical facilities, parks and affordable housing. Many of us have participated in recent LIC Core Study sessions, testified at prior rezoning hearings, written letters to the BSA and city government officials. Our comments refer to this one project, but should not be considered in a vacuum in this area for other projects to come before DCP or the BSA.

Our comments, in significant part, echo community testimony provided by the Court Square Civic Association, Hunters Point Civic Association, Hunters Point Community Coalition, Long Island City Coalition, the Municipal Arts Society and numerous other community residents at the scoping meeting on December 14, 2017 as well as the subsequent public meeting that CB2 held on January 10, 2018.

Limited Outreach and Time for Community Review of the Proposed Application

The Applicant had ample opportunity to engage CB2 as well as local community organizations for months, or years, in advance, prior to the scoping meeting, and choose not to do so. There was little public input into this rezoning proposal prior to the Applicant's presentation at the scoping meeting.

In addition to CB2, community organizations such as the Court Square Civic Association, Hunters Point Civic Association, Hunters Point Community Coalition, Long Island City Coalition have been leaders in visioning and prioritizing the neighborhood socio-economic, infrastructure and environmental issues facing residents and local businesses in our a rapidly growing community with an ever changing skyline that seems to be in a constant state of construction such as Long Island City and Hunters Point. The lack of public involvement in crafting this private zoning application, combined with the scale of the project, has been woefully absent and devoid of adequate formal community participation. As such fails to consider critical community needs and environmental impacts.

Pedestrian Walkways and Bridges:

Prior Plans for Queens West and properties around Anable Basin and north of 44th Drive included a proposed pedestrian bridge at 5th Street serving as a continuation of 5th Street over Anable Basin. The purpose of the bridge was to connect Queens West to the waterfront esplanade that was envisioned along the entire East River shoreline of Queens. Today, more than ever, the Anable Basin Bridge should be built in order to provide a faster pedestrian route to the ferry (it's unclear as to when continuous public access will ever be provided around Anable Basin) and a smooth transition between the southern and northern sections of the Hunters Point waterfront.

Current inadequate transit along the waterfront

Create new modes of transportation.

Streetscape improvements

Streetscape greening and design, lighting, landscaping treatment, plantings, connectivity to Queens West and Hunters Point Parks, Street Furniture.

Create inclusive pedestrian community for seniors that exceed ADA compliance

Traffic Circulation

Street grid changes and creation of "lanes". Define "lane" as a zoning term, size, dimensions, accessibility. As with other projects in Hunters Point, the community is concerned about the impact of development-related truck traffic and how deliveries will be made to the buildings. Given the narrow streets serving Anable Basin, all of the new buildings should include internal refuse pickup areas so that garbage is not blocking sidewalks while waiting for pickup. The FDNY needs to review traffic flows to ensure they can adequately service buildings during emergencies. The Applicant should encourage alternate transportation, such as the East River Ferry Service and bicycles. The applicant needs to allocate sufficient space within each building for bicycle storage. The applicant should also work with DOT to determine if bike rental services such as Citibike could be established within the project. Space for car share programs and electric charging stations should be provided within each of the project's parking facilities.

The Special AB District zoning text would require that a "publicly accessible lane" be provided in each of Parcels A, B, and C within specified "flexible zones," and with certain minimum and maximum dimensions and requirements. Parcel A would have two flexible lane zones. These parcels would be further subdivided in the special district text into sub-Parcels corresponding to the property on either side of a lane, namely, A1, A2, A3, A4, B1, B2, C1, and C2 (see **Figure 7**). Because the exact locations of the lanes would be flexible within the lane zone, the exact dimensions of the sub-Parcels would not be defined in the text and the resulting buildings cannot be evaluated properly and therefore should not be allowed.

Cumulative Environment Impacts

CB2 urges DCP, and the many NYC government agencies that provide municipal services, to study this project in the context of other proposed rezoning and BSA exceptions to the zoning, as of right developments and the pipeline of residential building, commercial and hotel applications currently pending that have yet to break ground. Examples of projects that will result in cumulative impacts are EDC/TF Cornerstone rezoning of 44th Drive, the pending Paragon Paint BSA application, the further buildout of Hunters Point South Parcel C, F &G, the former Budweiser site, the LIC Core rezoning, as of right projects under construction in the Court Square area, the stalled Silvercup site rezoning, the DOE and stalled Vernon Blvd Tennis Club site now locally known as “Lake Vernon” as well the pipeline of 34 hotels. We also suggest that large scale developments that have taken place and will take place further east in Queens such as Willets Points in Flushing will further impact transportation issues in Western Queens, specifically Hunters Point.

Land Use, Zoning And Public Policy

Geographic Boundaries

The transformation of the geographic area from the Queensboro Bridge to the North, Newtown Creek to the South, the East River to the West and Sunnyside Yards to the East comprises the geographic boundaries of the LIC development boomtown. The incremental impacts of the proposed private rezoning application must not be considered in a vacuum and we call on DCP to study this project in the context of the corollary stresses on transportation, open space, housing affordability, residential and business displacement, sewer system capacity, school enrollment, job generation and wages, community facilities, public safety, arts and culture, health facilities, natural resources and sustainability that are concurrently emerging in this geographic area during the timeframe of the buildout by 2034.

Areas of Concern

Transportation, alternative transportation, bike lanes.

The existing subway transportation network in LIC is antiquated and inadequate. Stations are not handicapped accessible, with the exception of the Court Square station escalators, added by Citi Bank as a community benefit. The Vernon Blvd #7 station is severely overcrowded during rush hour and expansion of the station is limited by existing subsurface conditions.

Study the incremental proposed population growth generated by 15,000 additional housing units to be constructed in the 15-year buildout in the context of the overall LIC and Queens population growth projections and the anticipated L train shut down. Transportation improvements must address the cumulative impacts, not just the incremental needs of this discreet private rezoning application.

Open Space

The Anable Basin Project, as proposed with 5.8 million gross square feet developed on a mere 12 of actual useable acres of land, is a massive project in comparison to Queens West and Hunters Point South. When completed, Queens West and Hunter's Point South will total approximately 10,000 units on close to 70 acres of land. The Anable Basin Project is in stark contrast to Queens West and Hunters Point South in terms of its excess density, height, and its tiny amount of public open space. Community Board 2 has always maintained that the height, bulk, and density of any project is of paramount concern.

The Project Plan states the project will be built on 15.4 acres which includes land that unbuildable in Anable Basin. The actual development is on 12 acres. This application complies minimally with open space requirements review adjacent population density in relation to need for open space. The ratio of development to public open space is severely deficient in Western Queens and this project will only exacerbate the deficiency.

Underserved areas are areas of high population density in the City that are generally the greatest distance from parkland where the amount of open space per 1,000 residents is currently less than 2.5 acres.

Open Space Ratio (OSR), as defined by DCP Glossary of Planning Terms, is the amount of open space required on a residential zoning lot in non-contextual districts, expressed as a percentage of the total floor area on the zoning lot. For example, if a building with 20,000 square feet of floor area has an OSR of 20, 4,000 square feet of open space would be required on the zoning lot ($0.20 \times 20,000$ sq ft).

Therefore, the Applicant should be required to use site C2 for additional public open space instead of floor area. The resulting public open space would be large enough to be used site C2 of the Plan and using the site for open space to be used for an active recreation/multi-purpose playing field. The owner should either agree to a reduction in FAR in the Project Plan or transfer the floor area to other sites within the Proposed Development boundaries.

Other considerations to be addressed in the EIS

The applicant and DOT must ensure that streets surrounding the project are improved with trees and pedestrian lighting, City benches, and bike racks. All of the project's proposed ways should similarly be required to be landscaped and lighted and include generous quantities of moveable and fixed seating. The majority of the benches should have backs.

Housing affordability - Multiple and deeper income bands must be included in this project. We ask that the model for Affordability be used in for Parcel A in Hunters Point but with modifications to allow for more middle class applications and veterans.

Residential and business displacement - short term leases, relocation during construction

Solid waste and sanitation – capacity of the sewer system is inadequate, testimony at the public scoping session and historic complaints about backups and overflows should be addressed.

School enrollment – 700 seat school

Job Generation And Wages

Community Facilities – There is currently no Community Center in this neighborhood indoor recreation space for families and seniors, e.g. a YMCA.

Public Safety – Undersized and antiquated police station facility, parking requirements disrupt neighborhood residents

Arts and Culture – thriving artist community concerned about being “priced out”.

Public Health – access to major medical facilities, urgent care, transportation to Manhattan hospitals by ferry should be studied.

Natural resources – impacts of 700 ft building on the waterfront on bird migration.

Sustainability

Mitigation of Construction Impacts – Noise, dust, removal of hazardous materials, staging, deliveries, moving trucks, cranes through the neighborhood.

Emerging concurrently in a compressed timeline – Our community is facing not just the incremental impact of this one proposed project but the exponential impacts of a widespread buildout and transformation of this former industrial area, the character of which, as residential community was unanticipated.

Socioeconomic conditions – shift in community income to market/luxury buildings, proximity to NYCHA campus, LaGuardia College, strengthen job generation activities.

Shadows – the height and density of a 700 ft building.

Historic resources

Urban design / visual resources – wayfinding.

Neighborhood character – shift from old industrial economic activity to new activity, preservation of industrial floorplate and footprint – what do new industrial businesses need?

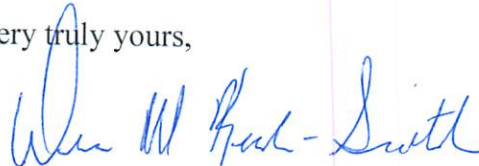
Conclusion

We urge DCP to include each of these considerations in the final scope of work to be issued, and require that each of them be fully and comprehensively addressed by the Applicant in great detail so that CB2, and all of our constituents, will have all necessary information to assess and determine the cumulative effect of the Proposed Action, and whether it is in the best interests

of our community as presented or in any form at all. This is particularly important in light of the numerous other impactful projects described above, especially the EDC/TF Cornerstone rezoning of 44th Drive and the pending Paragon Paint BSA application which are immediately adjacent to the Applicant's site. It is of paramount importance that the final scope of work for the EIS require that each of these considerations be addressed so that it may serve as a model for what will be required of each of these other projects.

Thank you for your consideration of our comments, which we hope are both useful and instructive as to what needs to be included in the final scope of work.

Very truly yours,



DENISE KEEHAN SMITH,
Chairwoman, CB2



LISA DELLER
Chairperson, Land Use Committee, CB2

- cc: Honorable Joseph Crowley, US Congress
Honorable Carolyn B. Maloney, US Congress
Honorable Grace Meng, US Congress
Honorable Nydia M. Velazquez, US Congress
Honorable Michael Gianaris, NY State Senate
Honorable Brian Barnwell, NYS Assembly
Honorable Michael DenDekker, NYS Assembly
Honorable Catherine T. Nolan, NYS Assembly
Honorable Robert Holden, NYC Council Member
Honorable Jimmy Van Bramer NYC Council Member
Honorable Daniel Dromm, NYC Council Member
Honorable Melinda Katz, Queens Borough President of the Borough of Queens
Honorable Melva Miller, Deputy Borough President
Irving Poy, Queens Borough President's Office
Patrick A. O'Brien, Chair, City Services & Public Safety Committee