

**Court Square Civic Association
Hunters Point Civic Association
Hunters Point Community Coalition
Long Island City Coalition**

January 5, 2018

Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
Department of City Planning, City of New York
120 Broadway, 30th Floor
New York NY 10271

Re: Draft Scope of Work, Environmental Impact Statement
Anable Basin Rezoning (CEQR No. 18DCP057Q)

Dear Mr. Dobruskin:

The Court Square Civic Association, Hunters Point Civic Association, Hunters Point Community Coalition, and Long Island City Coalition are four community and not-for-profit organizations that collectively represent residents, property owners and business owners of the Long Island City community. Together we support sustainable development and well-planned growth that benefits existing as well as new residents and business owners, protects the quality of life and our environment, is proactive about climate change and resiliency, increases social equity, and distributes economic development fairly.

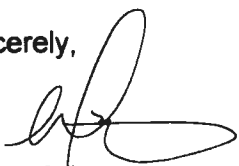
We believe this vision for Long Island City's future is possible with far-sighted and inclusive planning that embraces the changing East River waterfront and rapidly developing transit hubs along Jackson Avenue while also supporting the livable, dynamic neighborhood in-between that ties them together. We see Anable Basin as an opportunity to create an innovative and equitable place where exemplary waterfront planning responds credibly to climate change. Anable Basin's financial advantages include low land costs for low-density industrial properties purchased decades ago by a private owner, reimbursement for cleanup of brownfields by New York State, and New York City's tax exemptions for affordable housing. This is not a case of financial hardship for high-priced waterfront land. These exceptional advantages mean that Anable Basin could become a place where housing is affordable for all income levels, a place with sufficient open space to foster civic interaction regardless of economic standing, a place that recognizes insufficient public transportation by accommodating many alternatives, a place that respects the height and density of adjacent neighbors, and a place that inspires a thriving arts community to continue the intelligent manufacture of its well-known products.

While some of these elements are listed as goals of the Anable Basin rezoning, the project as actually proposed disregards the larger cumulative environmental impacts, exacerbates overdevelopment and piecemeal planning, ignores community input, and provides few public benefits. Among the concerns of our members are land uses, affordable housing, displacement, scale, height, density, open space, shadows, natural resources, infrastructure, climate change, neighborhood character and the quality of life. We have included detailed descriptions of those concerns in the enclosed comments on the Draft Scope of Work.

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Our organizations look forward to a continuing dialogue with you and the Department of City Planning as the Anable Basin Rezoning moves through the planning process.

Sincerely,



Pedro Gomez, President
Court Square Civic Association



Brent O'Leary, President
Hunters Point Civic Association



Thomas Paino, RA, Executive Director
Hunters Point Community Coalition



Melissa Bieri, Founder
Long Island City Coalition

- Cc: Hon. Carolyn Maloney, U.S. House of Representatives
Hon. Bill De Blasio, Mayor of New York City
Hon. Catherine Nolan, New York State Assembly
Hon. Jimmy van Bramer, New York City Council
Hon. Melinda Katz, Queens Borough President
Ms. Lisa Deller, 1st Vice Chair, Queens Community Board 2
Mr. James Patchett, President, New York City Economic Development Corporation
Mr. John Young, Director, NYC Department of City Planning/Queens Office

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**Comments on the Draft Scope of Work for an
Environmental Impact Statement for the
Anable Basin Rezoning CEQR No.: 18DCP057Q
January 5, 2018**

The Court Square Civic Association, Hunters Point Civic Association, Hunters Point Community Coalition, and Long Island City (LIC) Coalition are four community and not-for-profit organizations that collectively represent residents, property owners and business owners of the Long Island City community. We have come together to call on the New York City Department of City Planning (DCP), the CEQR lead agency for the proposed Anable Basin rezoning, to reconsider the Draft Scope of Work (DSOW) for an Environmental Impact Statement (EIS). While our members have many concerns which are described in detail below, three issues are top priorities for us:

- 1) address cumulative environmental impacts with a broader, coordinated EIS;
- 2) reduce the massive scale of the proposed zoning and special district; and
- 3) include community participation in both this EIS process and the other proposed discretionary actions.

Address Cumulative Environmental Impacts

Our neighborhood is already undergoing numerous other large-scale developments and rezoning proposals that will have significant, interrelated environmental impacts. Rather than conduct a review of the proposed Anable Basin rezoning in isolation of these other projects, we strongly request that the City coordinate a broader EIS effort that takes into account the cumulative environmental impacts of this rezoning along with two directly adjacent proposals on the waterfront - the New York City Economic Development Corporation (EDC) Long Island City Waterfront Project and the variance application before the Board of Standards and Appeals (BSA) for the Paragon Paint site - and with the DCP's extensive LIC Core Rezoning, which is located just a few blocks inland. In addition, the long undeveloped East River Tennis Club waterfront site just to the north of the proposed EDC project should be part of a cumulative analysis. Among other advantages of a united approach, there is an opportunity to create a more resilient shoreline along the East River benefiting everyone in the area if comprehensive flood-protection strategies are thoroughly coordinated between the Anable Basin's and Paragon Paint's private owners and the agencies responsible for public lands on the waterfront. Another opportunity is to create an inter-modal transportation system that leverages public investments in infrastructure by reaching east-west from the new Citywide ferries on the East River back inland to the subway lines in the LIC Core and extending north-south along existing streets, planned waterfront esplanades, and the proposed Brooklyn-Queens Connector (BQX). Our comments below will describe these and other elements of the Draft Scope of Work that are affected by interdependent and cumulative impacts, which range from socioeconomic conditions and open space to shadows and construction impacts. To take advantage of these opportunities, the piecemeal EIS proposed for the Anable Basin Rezoning should be supplanted with a coordinated review of all four projects that addresses their overall cumulative environmental impacts.

Reduce the Massive Scale

In the last two decades alone, our community has already undergone explosive development from a series of major projects: Queens West, the Northern Hunters Point Waterfront Special Mixed Use District (Silvercup), the Special LIC Mixed Use District, Queens Plaza/Court Square rezoning, and most recently the Special Southern Hunters Point District. Anable Basin is located in a part of Long Island City that is remote from mass public transportation, lacks infrastructure and is already starved for open space. The proposed Anable Basin Rezoning, however, exceeds even the highest densities previously approved. For example, the number of residential apartments proposed of 5,000 is equal to that of Hunters Point South which has twice the amount of acreage (30 acres). According to the Draft Scope of Work, the rezoning could produce a total of 5.8 million square feet of buildings on three blocks. The site covers only 15.4 acres of which at least 3 acres is actually “land” underwater. The resulting density on the land area (above water) of 10.8 FAR rivals high-density areas of Midtown Manhattan that are well served by public transportation, infrastructure, open space and public services. In addition, the towers at Anable Basin are proposed to reach 695’ which is almost double the height of the tallest buildings next door at Queens West and exceeds even the Citicorp building. The impacts of this massive scale on this area, in addition to the developments that have already taken place, will be described in more detail below in our comments but will have significantly adverse impacts on almost every category in the DSOW.

Include Community Participation

Our combined community organizations include many long-term and current stakeholders who stand ready to contribute their knowledge of the area to the proposed rezoning. So far, there has been no community consultation on the Anable Basin proposal. The public notice of the Scoping Meeting was issued on November 14, 2017 right before Thanksgiving with no notification to Queens Community Board 2 (CB2) or other stakeholders until December 7, 2017. The Land Use Committee of CB2 wasn’t informed about the pending rezoning until the day after it was made public. The period for written comments includes the Hanukah and Christmas holidays, and ended on December 26, 2017, the day after Christmas. We appreciate the last-minute extension to January 19, 2018, however, given the major scale of the proposed rezoning, we request that the period for public comments be extended until March 31, 2018. In the future, we also request that both the civic organizations in the area and CB2 be given opportunities to provide meaningful participation in this process, including the rigors of a formal Monitoring Committee and advance notification of public meetings and actions.

The following are joint comments of our four community organizations and are organized in the same order as the DSOW.

A. Introduction

Required Approvals and Review Procedures

Public Reviews

The DSOW states that public review would be required by CB2, the Queens Borough President, NYC Planning Commission, and NYC Council. We request that this list be expanded to include the EDC on their proposed rezoning of properties across the street on 44th Drive and oversight

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of Hunters Point South; NY State Department of Environmental Conservation (DEC) on segmentation of the environmental review process, the possible pedestrian bridge at 5th Street and the NYS Brownfield Cleanup Program (BCP); NYC Department of Transportation (DOT) on coordination of the changes proposed to turn their current facilities at 44th Drive into a public school; the NYC School Construction Authority on impacts to the adjacent IS/PS 78 and proposed new school site on 11th Street; and all other relevant public agencies.

As already discussed above, the Hunters Point community also requests that meaningful community participation be considered an integral part of the entire Anable Basin Rezoning planning process.

Discretionary Actions

While the discretionary actions are listed here, they may have a substantial impact on the resulting project. For example, they apparently propose entirely new zoning terms and vocabulary such as “Production/Light Industrial Use” and “Lane.” In order to fully evaluate the applicant’s proposal and its environmental implications, we request that drafts of the proposed discretionary actions be provided, including the zoning text amendments.

Figure 1 – Project Location

We respectfully request that future documentation of this proposed rezoning include high-quality maps on which the street names, neighborhoods and other significant elements can be read clearly.

Figures 2 and 4 – Existing and Proposed Zoning

This EIS is based on a proposed creation of a new Special Anable Basin District. In order to be able to assess the impacts of adding another special district to this already heavily fragmented area, please provide a map showing the proposed district in the context of the existing special districts on the riverfront from Hunters Point South to the MX at Silvercup and any other proposed special districts in LIC, including the LIC Core Rezoning.

Figure 2 designates Queens West, which is predominately residential, as an M3-1 zone. This is misleading to decision-makers and other people not familiar with New York State’s jurisdiction there. We request that “Queens West” be labeled on this figure and that areas of privatized open space at Queens West not be counted as public parks or colored green on the maps.

Figure 3 – Aerial View

Please provide the date and source of aerial photographs.

City Environmental Quality Review (CERQ) and Scoping

We request that DEC be considered for the lead agency or co-lead agency role for the proposed Anable Basin Rezoning within this CERQ process given the extensive environmental issues raised by the application and their current oversight of both Hunters Point South and remediation of this site under the NYS Brownfield Cleanup Program (BCP).

As already discussed above, we request an extension of time on submission of written comments to March 31, 2018.

This section states that written comments on the DSOW will be accepted until Friday, December 26, 2017, which is a Tuesday, and provides no address for submission of the comments. Please clarify the date and provide an address.

B. Area Affected by the Proposed Actions

The DSOW proposes to change the current blocks and lots to adopt development parcels and sub-parcels in their place. We question the large size of the sub-parcels, which exceeds typical lot sizes in Hunters Point and will promote over-scaled building footprints. We disagree with the proposal that the dimensions of the sub-parcels would be "somewhat flexible." Please clarify what would be considered zoning lots and tax lots under this parcelization scheme.

Figure 6 – Projected and Potential Development Sites

Existing block and lot numbers are used in the text, but do not appear on any of the figures provided. Please add a new figure that shows the current blocks and lots along with the surrounding blocks so that existing and proposed conditions can be compared.

Rezoning Area (Affected Area)

As previously mentioned, the portion of Anable Basin outside the proposed rezoning area which is technically zoned M3-1, actually contains residential buildings and should be described as New York State's Queens West development.

We understand that FEMA is currently revising the Flood Insurance Rate Maps (FIRMs) based on New York City's technical appeal of the preliminary FIRMs issued in January 2015. Please identify what FIRMs will be used for this EIS.

The DSOW states that the base flood elevation (BFE) is 12'. A check of the current FIRMs in use shows that a portion of the East River wharf is in the VE zone at a BFE of 14', and that other parts of the proposed site have BFEs of both 11' and 12'.

Please add information about the New York City Hurricane Evacuation Zones for the proposed rezoning area. We request that the thousands of people potentially displaced during an evacuation of the proposed project be added to the DSOW as an important environmental impact. We also suggest that the Office of Emergency Management (OEM) should review the application for emergency evacuation and shelter plans.

Proposed School Site

Please add information about the FIRMs, BFEs and Hurricane Evaluation Zones for the proposed school site.

C. Purpose and Need of the Proposed Actions

Background

Based on the background provided here, an extension of the Special LIC Mixed Use District into the blocks fronting on Anable Basin would be more appropriate than the gerrymandered site, new special district and spot zoning that is proposed. The Special LIC Mixed Use District

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already promotes development of the longstanding mix of residential, commercial, industrial and cultural uses at a variety of densities in its current subdistricts. Adding Anable Basin as another subdistrict of the existing special district would help unify the area and provide more appropriate densities and building forms with its contextual zoning. By contrast, the special district/spot zoning proposed will potentially harm adjacent owners and the proposed boundaries arbitrarily exclude lots on the corner of Vernon Boulevard and 46th Avenue. There does not appear to be any real need for the zoning or special district proposed for the Anable Basin blocks.

In terms of a potential future innovation district, the proposed Anable Basin rezoning does not meet the criteria described even in the DSOW for such districts in other cities. This rezoning does not have any phasing plan despite its 15-year timeline; it is not proximate to existing business centers; and there is no significant presence of innovation economy firms here. Successful innovation districts depend on the creation of an ecosystem based on an ethos that is green, sustains a pipeline of talent, and offers connectivity supported by infrastructure such as public gathering spaces and broadband. None of these key elements of an innovative ecosystem appear to have been considered in the proposed development. Without them the ferry to Cornell/Technion will merely serve as a shuttle from a bedroom district.

Project Objectives

It is disappointing that the project objectives do not include sustainable development, green buildings, respect for the existing community, social equity, or shared economic development.

Principles

Flexibility:

The history of “flexible” mixed-use zoning in Long Island City has resulted in almost exclusively residential development and turned our neighborhood into a bedroom community for workers commuting to Manhattan. We disagree with allowing this rezoning to have flexibility as-of-right.

If parameters exist to “guide development over a large area and long development timeline” then we request they be shared with the LIC community and considered as part of the Scope of Work for the EIS. For example, what is the phasing plan?

Appropriate Density:

The extremely high residential densities proposed for Anable Basin can in no way be justified by the costs of public open space and buildings on this waterfront. Anable Basin’s financial advantages include low land costs for low-density industrial properties purchased decades ago by a private family and owned outright, reimbursement for cleanup of brownfields by New York State, and New York City’s tax exemptions for affordable housing. This is not a case of financial hardship for high-priced waterfront land.

As mentioned above, Anable Basin is located in a part of Long Island City that is remote from mass public transportation, lacks infrastructure and is already starved for open space. The proposed Anable Basin Rezoning, however, exceeds even the highest densities previously approved. For example, the number of residential apartments proposed of 5,000 is equal to that of Hunters Point South which has twice the amount of acreage (30 acres).

Design Concepts:

The proposed urban design framework with concepts such as a “porous circulation grid,” “active building frontages,” and “climate resilient design” completely lacks credibility without a comprehensive plan in place to combat sea level rise and storm surge.

D. Proposed Actions

Anable Basin Rezoning

While the discretionary actions are again listed here, they may have a substantial bearing on the resulting project and its environmental impacts. In order to fully evaluate the applicant’s proposal and its environmental implications, we request that drafts of the proposed discretionary actions be provided, including the zoning text and map amendments.

Additional Potential Discretionary Actions

The proposed transfer of the school site to the School Construction Authority (SCA) appears to be disconnected from the necessary site selection and other approvals by the SCA, the Mayor and City Council, not to mention the actual construction and operation of the school. The LIC community has seen repeated cases where FAR was given away to developers based on promises of providing community facilities which were never delivered. Examples include the Queens Library’s Hunters Point Branch at Queens West and the Maximilian-CUNY student housing. We demand that any additional FAR over adjacent zones provided to this applicant be tied directly to the actual delivery of those public benefits and that the FAR and school site credits not be released for construction until the public benefits are in place and operational.

Description of the Proposed Actions

The LIC community agrees with the stated intentions of the proposed actions to allow a range of uses, enhance the existing light industrial character, encourage arts and cultural uses, and extend the mixed-use character of the area. However, we seriously doubt that adding a new special district and making the other zoning text and map changes described will achieve those goals.

Zoning Map Change/Creation of Special District

The explosive overdevelopment that has taken place in Long Island City in just the last twenty years has already dramatically and adversely affected the quality of life in this community. The cumulative impacts include: crowded open spaces, stress on public infrastructure, additional traffic, loss of light and air, displacement of small businesses, displacement of longtime residents and artists, loss of parking, continual construction noise and debris, dangerously overcrowded mass transit, higher property taxes, stress on police and fire resources, and threats to the neighborhood’s essential character.

We support zoning that respects the context, density, height, scale and bulk of the surrounding community. The proposed high-density residential zones are inappropriate for this area. The density of the proposed zoning is M1-5 paired with high-density R9, R8 and R7-2. These R zones are generally mapped where there is no existing context, not in an existing vibrant neighborhood like Hunters Point. They greatly exceed the adjacent zones of moderate-density

R6A and R6B. In addition, they will bring non-contextual zoning to the area which will change the architectural massing to Manhattan-style buildings like towers-in-the-park. By contrast, all the surrounding zones are contextual. These zones require street walls that relate better to the existing urban fabric and fixed height limits that protect light and air for the neighborhood. We strongly recommend considering an extension of the adjacent Special LIC Mixed Use District and its contextual zoning.

The proposed R9 zone extending deep into the low-rise neighborhood is especially egregious. R9 is typically mapped only on major thoroughfares in Manhattan where there is ample transportation and substantial infrastructure. The LIC community has seen the East River Tennis Club site, where R9 was zoned over twenty years ago, turn into a failed development which is now flooded. Several attempts have failed to keep the East River at bay and that property is known now as "Lake Vernon." The flooding has not only severely impacted the directly neighboring properties, but also the public right-of-way on Vernon Boulevard.

Vernon Boulevard, which is the friendly Main Street of Hunters Point with low-rise, small-scale buildings, is currently zoned R6A with a C1-5 commercial overlay. We do not support the proposed rezoning of Vernon Boulevard to M1-5/R8, especially as a one-sided move on the west side of the street. Instead, the existing zoning should be extended on both sides of Vernon north to 44th Drive.

Waterfront Access Plan

This section states that a new Waterfront Access Plan (WAP) will be created, whereas previous sections say that the existing Northern Hunter's Point WAP will be amended. Please clarify.

It is disappointing that the proposed waterfront access barely meets the minimally required access in the Northern Hunter's Point WAP. In fact, one required upland connector and visual corridor has been eliminated and another had been replaced by an undefined "flexible lane zone."

The proposed mid-block connections, "lanes," providing additional waterfront access are an interesting concept; however, questions need to be addressed about their design, minimum width, permitted obstructions, hours of operation, commercial use, and potential for adding to inland flooding. Given that the zoning text already has detailed provisions for upland connections and visual corridors to the waterfront, we question the need to add a new category of alleyways or "lanes."

The prolongation of 5th Street as a visual corridor required by the WAP comes to an abrupt halt at the proposed EDC project, providing more evidence of why these waterfront sites must be analyzed for impacts accumulatively.

The use of public waterfront access to meet the applicant's needs for flood-control measures is unacceptable. Over half the required width of the proposed shore public walkways (40' minimum) is taken up with steps to meet the mandated base flood elevations for the applicant's proposed building sites. In addition, the proposed clear widths of 6' and 12' meet only the minimum requirements for the "circulation paths" and are extremely narrow for adequate public circulation on a project of this proposed density.

The proposed rezoning site is the lowest along the Queens' side of the East River bank and requires a viable plan for coastal defenses against sea level rise and storm surge in conjunction

with both hard and soft adaptive urban strategies. The words “encourage resiliency” blatantly miss the scale of the problem, which includes increased flooding to the upland community.

All ramps connecting proposed levels should be ADA compliant.

We strongly disagree with reducing planting requirements for required waterfront elements. It is especially disrespectful of the community to claim that this would “reflect the character of the waterfront at this location.” We also note that the proposed “lawn” is not feasible for a site, like Parcel A-1, experiencing saline inundation.

Figure 7 – Proposed Special Anable Basin District Parcels, Lanes and Public Access Area

Indicate where this plan differs from the Northern Hunters Point WAP. Indicate how this plan would connect with existing waterfront access at Queens West and the required WAP elements on the adjacent parcel (Parcel 7) of the proposed EDC development. Label all streets. Indicate the existing public pier. Provide proposed minimum widths of all required shore public walkways, upland connections and visual corridors.

E. Framework for Environmental Review

Reasonable Worst Case Development Scenario

Affordable Housing

Affordable housing has strong support from the LIC community; however, trading large amounts of luxury housing for affordable housing has proven to be an expensive way to achieve this goal in terms of negative side effect and unintended consequences. This approach has already been documented for adding to displacement in similar waterfront rezonings, rather than supporting mixed-income and economically-diverse communities.

It is unclear what Mandatory Inclusionary Housing (MIH) programs are proposed for this rezoning. The text discusses Option 1 and 2 as well as a Deep Affordability Option and Workforce Option. We expect the EIS to clearly lay out the assumptions used for the MIH program.

This neighborhood is home to many families that have lived for years and generations in LIC and are now at risk of being forced out by the type of development proposed. Affordable housing should be set aside for current residents of the community, including large families needing 3 or more bedrooms. In addition, the LIC community would like to see housing designated for artists. Successful artist housing projects such as Manhattan Plaza and Westbeth Artists Housing could be used as models.

As mentioned directly below, a high percentage of affordable apartments in LIC should be designated for large families and have 3 or more bedrooms.

F. Environmental Review Process

Throughout the environmental review process, the basic assumptions for generating the numbers of residential populations and children need to be adjusted to reflect that the LIC community consists of large families and that there is an existing housing shortage. Many apartments have occupancy levels that exceed the typical assumptions used for CEQR, for example, there may be a family of three or four people in a one-bedroom apartment and families of four to six people living in two-bedroom apartments. Inadequate population assumptions, particularly for residents during the Queens West and Hunters Point South EIS processes, have already resulted in environmental burdens on the LIC community.

3) Socioeconomic Conditions

The EIS should analyze all relevant categories of residents, businesses and properties for the tax implications that underlie displacement. Key categories should include:

- Resident home owners, including those who may also have some rental units;
- Residential rental properties;
- Commercial properties, specifically document the displacement associated with the replacement of low for higher rental spaces;
- Retail tenants, including vacancies; and
- Tax-abated properties, especially for 421-a abatements.

The economic landscape of LIC today includes many small businesses, manufacturers and artisans along with a vibrant arts community. These small businesses have a ripple effect on the economy of LIC because they tend to use local suppliers and employ local residents. Destabilizing the existing economic assets of the area and the business ecosystem needs to be taken into account in the methodology used for the EIS.

There is also an underlying assumption in the proposed rezoning that businesses can easily relocate to new built spaces. This greatly underestimates the impacts on existing businesses, which will have the added costs of loss of income, retooling and retrofitting equipment, legal services for new leases, and business disruption.

Regardless of the applicant's intent to retain existing business and provide long-term leases, there are no guarantees in this proposal. The applicant is currently providing only short-term leases which already adds costs to existing tenants of frequently renewed leases and uncertainty.

Task 4) Community Facilities and Services

The LIC community welcomes the addition of new community facilities and services as part of this large-scale proposed rezoning. Unfortunately, we note that the only gesture offered as part of the application is a transfer of two lots for a potential future school site. With the influx of over 12,000 additional residents and over 2,500 new workers, many other facilities will clearly be needed. Examples of needed facilities would be additional senior and child care centers with cooling capabilities for the increasing number of heat waves expected from climate change.

This section of the EIS again reinforces the benefits of coordinating a broader EIS process that allows for analysis of the cumulative impacts of all proposed projects in LIC, rather than relying on the haphazard provision of these community-wide facilities and services by individual

projects. One of the advantages would be a coordinated funding effort for community facilities and services that maximizes public investments.

Schools:

Not only are the four existing schools in LIC already seriously overcrowded, but three of them are located in Hurricane Evacuation Zone 1. In fact, the Robert F. Wagner PS 78 was closed for at least seven days after Hurricane Sandy. There were also substantial impacts to taxpayers when the school was remediated in Sandy's aftermath.

It is projected that the proposed Anable Basin rezoning will increase the school-age population in LIC by approximately 2,700 children. We note that the proposed future school site, if viable, would accommodate only 728 new seats, less than a third of the projected additional children.

The proposed school site on 11th Street raises many questions that need to be addressed, such as its location on a high-density and high-speed traffic street, where school buses will drop off/pick up students, and where outdoor play areas will be provided. Traffic on 11th Street is frequently backed up at the proposed school site during rush hours and when the Pulaski bridge is opened for vessels on Newtown Creek.

The proposed school site is located in Evacuation Zone 3; however, it sits at a low point on 11th Street where there have been sewage backups and basement flooding in adjacent properties.

We also note that the proposed school on the DOT site (part of the EDC proposal on 44th Drive) is in Evacuation Zone 1 and will be in shadow throughout the day from this proposed Anable Basin development.

As noted above, any School Site Credits allowed as part of the school site transfer should be tied directly to a phasing plan that calls for that additional floor area to be released only after actual completion and operation of the school itself.

Figure 15b – Community Facilities Study Area – Childcare Facilities

The study area of 1½ miles for the identification of publicly funded group child care facilities, ignores the presence of Newtown Creek between LIC and northern Brooklyn and of the Dutch Kills between LIC and Sunnyside Yards East. It is highly unlikely that young children will be transported to these areas for child care. We request that they be removed from the study area for childcare facilities.

Task 5) Open Space and Recreational Facilities

Overdevelopment of the area has dramatically reduced the open space ratios in Hunters Point and Long Island City. Parks are already overcrowded and recreational facilities are minimal for the large increase in population from developments that are already built. As a result, this area ranks only 46th out of 51 City Council districts in terms of the ratio of open space to population. Despite the dramatic increase in population proposed by this project of over 12,000 new residents and over 2,500 additional workers, it proposes no new parks and complies minimally with the required waterfront access plan. On a 15.4-acre site, only 3.1 acres (19%) are proposed for public open space, and a significant amount of that lies below the base flood elevations. We note that this fails spectacularly to support the city's goal of 2.5 acres per 1,000

residents, much less the 2.5 acres per 520 that the Cornell/Technion campus will enjoy upon its build-out in 2043.

Our organizations see open space and recreational facilities as essential components of creating a community with a high quality of life and preserving our livable neighborhood. Families need parks where parents can relax with their children and communities need places where people can gather, play team sports together, and connect with each other. One model that could be followed here for recreational facilities would be the partnership between TF Cornerstone and Chelsea Piers for a 52,000 sf gym in downtown Brooklyn. The LIC community would also welcome outdoor team sport facilities, such as soccer fields. In addition, planted, pervious parks at the waterfront can be designed as opportunities for public open space to serve multiple purposes, such as providing protection from shoreline erosion, polluted runoff, sea level rise and storm surges.

We object strongly with the calculation put forward in the DSOW that adequate “open space” amounts to adding a sidewalk that is necessary to reach the new buildings, some undefined “lanes,” and an esplanade that is divided into two levels with minimal clear paths for circulation.

This area has already experienced contentious negotiations between parents and dog owners over severely limited public open space. The proposed actions will significantly increase the neighborhood’s dog population and demand for appropriate outdoor facilities for dogs, such as dog runs. We request that the allocation of protected playgrounds for children and recreational space for dogs be addressed in the Scope of Work, not left as an afterthought.

On the proposed methodology, the proposed actions will generate a significant number of visitor trips to the Anable Basin area. The Scope of Work should examine the effects of the non-residential populations including workers and visitors on the open space and recreational facilities, along with the residential population created by the proposed project.

Figure 16 – Open Space Study Area

This figure shows a quarter- and half-mile boundary where existing open spaces will be included in the inventory of publicly accessible open spaces. These boundaries ignore waterbodies and include open spaces at Roosevelt Island that should be removed from this inventory. The parks at Roosevelt Island are not publicly accessible to the population across the East River. The study area should be based on walking, not swimming, distances.

We also request that areas of privatized open space at Queens West not be shown as public parks or counted in the EIS inventory.

Task 6) Shadows

The shadow assessment is another task where it is clear that the proposed Anable Basin rezoning should not proceed in isolation of the interrelated projects in the area. Their cumulative impacts need to be considered. At a bare minimum, the three-dimensional computer model should include the EDC and Paragon Paint proposals.

In terms of sun-light-sensitive natural resources, we expect that both the East River and Anable Basin will be included.

The DSOW states that the proposed actions will only be studied on four representative days of the year. We request that the shadows be studied for all 365 days of the year. Computer programs are available that easily allow for complete shadow studies.

The DSOW also states that the maximum building envelope will be used for each of the proposed parcels and that the actual developments would cast smaller shadows. This fails to take into account the possibility of future zoning lot mergers, which allow bulk to be shifted anywhere on the merged lot, such as what recently occurred at 432 Park Avenue in Manhattan, a tower that rises to 1,400' tall. Zoning lot mergers would create significantly taller buildings as-of-right without any additional review mechanisms and should be considered in this shadow analysis.

Task 8) Urban Design and Visual Resources

The LIC community currently enjoys spectacular views of the Manhattan skyline and the East River. Directly across from Anable Basin are the internationally acclaimed buildings at the United Nations. Other iconic structures within the view corridors include the Empire State Building, Chrysler Building and Queensboro Bridge. Graphic material in the EIS should include eye-level views from the perspective of a pedestrian on the street in order to fully assess the visual impacts of the massive scale of this project. Illustrations should be provided of the following views:

- 44th Drive at Vernon Boulevard looking west to the East River;
- Vernon Boulevard at 44th Road looking south and including the EDC proposals;
- Vernon Boulevard at 45th Avenue looking south;
- 45th Avenue at Vernon Boulevard looking west;
- 45th Road at Vernon Boulevard looking west;
- 46th Avenue at Vernon Boulevard looking west;
- 46th Road at Vernon Boulevard looking west;
- 5th Street at 47th Avenue looking north;
- 5th Street at Anable Basin looking east; and
- all proposed "lanes."

Task 9) Natural Resources

Despite the fact that this entire rezoning application centers around Anable Basin off the East River, there is no mention throughout the DSOW of the Basin itself as a significant natural resource. Anable Basin is one of the few places along the East River that is sheltered from its complex currents and offers a unique opportunity to provide a relatively calm body of water for critical habitat. With the River serving as both a fish migration and bird flyway, this sheltered area plays an important role in supporting both aquatic and terrestrial ecological systems.

Anable Basin, however, is already a troubled body of water. Over time, the water quality of the Basin has been compromised by both the untreated discharges of legacy industries such as Paragon Paint and ongoing overflows from a combined sewer outfall (CSO) at 5th Street. As industries died out and vessels stopped using Anable Basin to deliver raw materials or ship out products, this elongated slip has stagnated and silted up. The massive Anable Basin development as it is now proposed will inevitably stir up existing pollutants in the water and sediments within the Basin. Among the reasons for concern about this natural resource are pile-driving for construction of buildings, disturbances to the water table in the adjacent landfill and neighboring capped brownfield sites from demolition and cleanup, and added storm runoff both during construction and after the proposed development is completed.

A positive sign today is that, at low water, mature wild oysters can be seen at the lower intertidal areas along some of the steel bulkheads and ribbed mussels pack many of the spaces on the wooden bulkheads. These signs of natural estuarine restoration should be assessed in the Scope of Work and the proposal evaluated relative to optimal restoration models, including the Hudson-Raritan Estuary Comprehensive Restoration Plan.

Another cause for concern about this natural resource is the new Citywide Ferry floating dock located just south of the mouth of Anable Basin. A research study on floating structures was recently conducted for the Port Authority of New York and New Jersey, Floating Structures Pilot Project: Fish Utilization & Responses and Hydrodynamics & Sediment Transport, which investigated sediment transport in similar slips. One of its key findings is that “The waves that dominate sediment resuspension in the slip are produced predominantly by vessel traffic in the Harbor, and in particular by passenger ferries. The wave energy in the East River and in the slip has a distinct daily pattern, with maximum wave energy during weekday rush hours and a more uniform wave climate that starts later in the day on weekends. The waves are uncorrelated with local wind forcing and the relatively long wave period (4-5s) are consistent with 12-15 knot speeds of vessel traffic.” (Appendix 2 - The Influence of Floating Structures on Sediment Transport processes, by Woods Hole Oceanographic Institution, Page 25)

Therefore, the Anable Basin EIS should examine the water quality, sediment quality, estuarine restoration, and resuspension of polluted sediment occurring today in Anable Basin as well as what would be projected when the proposed development dramatically increases storm water runoff, CSO overflows and ferry traffic.

Bird Migration

New York City’s geographic location at the crossroads of the Atlantic flyway migration route means that there are over 200 species of birds in the NY metropolitan area and a total of 300 species flying over, which is one third of the total number of bird species in North America. The East River is a prime route during both the Spring migration from March through June and the Fall migration from mid-July through November. We request that this significant bird migration be added to the Scope of Work. In particular, the natural resources assessment should examine the increased potential for bird collisions with the eight proposed new towers and their wind tunnel effects on the flyway. The Scope of Work should also add that information on bird species, habitats and ecological systems will be requested from scientists at New York City Audubon and the Cornell Lab of Ornithology, a unit of Cornell University.

Task 11) Water and Sewer Infrastructure

Wastewater and Storm Water Infrastructure

The DSOW lays out a detailed process for assessing the incremental effects of the proposed rezoning on the wastewater and storm water infrastructure, but does not mention the exacerbation of potential flooding and storm surge that may affect a much larger area. We again call for the environmental impacts of this proposal to be addressed in a broader EIS effort that takes into account the cumulative impacts of this rezoning along with the two adjacent proposals, Tennis Club site and the LIC Core Rezoning.

We also question whether the methodology proposed for the analysis of this section will adequately take into account the progressive impacts of climate change on the infrastructure,

such as elevation of the already high water table in this low-lying area from sea level rise, or more frequent and toxic flooding of streets, cars, buildings and basements due to more frequent and intense storm systems. As already described above, the concern is that proposed climate change defenses at the site proposed for rezoning – especially if undertaken in isolation from the cumulative impacts of the proposed other adjacent projects on the waterfront - will displace these impacts into the surrounding community. Instead, a broader EIS would be an opportunity to create a resilient shoreline along the East River protecting the area as a whole.

We request that the relocation of the CSO currently discharging directed into Anable Basin be considered during this analysis on infrastructure.

In addition, we request that the inclusion of green infrastructure be considered along with the traditional gray infrastructure described in the DSOW. In particular, planted, pervious surfaces at the waterfront can be provided as “sponge parks,” such as the one on the Gowanus Canal, that are opportunities for public open space to serve multiple purposes of providing protection from shoreline erosion and polluted runoff into the waterways.

Task 14) Transportation

Transportation is one of the issues that most clearly calls for the environmental impacts of this rezoning to be reviewed in a much broader context so that the cumulative and interrelated impacts of the other adjacent projects on the EDC and Paragon Paint sites along with the Tennis Club site and LIC Core will be considered together. The LIC community sees these proposals as a major opportunity to create an inter-modal transportation system that leverages public investments in infrastructure by reaching east-west from the new Citywide ferries on the East River back inland to the subway lines in the LIC Core and extending north-south along existing streets, planned waterfront esplanades, and the proposed Brooklyn-Queens Connector (BQX).

A comprehensive examination of transportation issues, *Western Queens Transportation Study*, has recently been completed by the DCP for the area between the East River, Steinway Street, Astoria Boulevard and Newtown Creek along with access to Roosevelt Island. Both community input and field research were conducted as part of the study. We recommend that the EIS team use this work as their frame of reference throughout the transportation analyses.

The DSOW proposes a minimal transportation analysis for this enormous new development of nearly 6 million square feet. We request that the following modes of transportation be added to the Scope of Work:

- bicycles
- ferries
- private buses
- school buses
- bus rapid transit or select bus service
- air traffic - helicopters & floatplanes
- Brooklyn-Queens Connector (BQX).

We also request that the following topics be added to the Scope of Work:

- 5th Street pedestrian and/or vehicular bridge,
- 44th Drive, and
- emergency evacuations.

Peak Hour Assumptions

The DSOW states that analyses will be made on a variety of transportation modes for the weekday AM, midday, PM, and Saturday peak hours if the initial screening shows the transportation impacts need assessment. We request that Sunday peak hours be added to the analyses to cover demand associated with people returning from weekends out of town, for example, from Long Island.

Traffic:

Truck routes and loading areas should be considered in the analysis of traffic for this mixed-use area.

Bus lanes should be considered for the Queensboro Bridge.

Traffic on 11th Street at the proposed school site should be analyzed when the Pulaski Bridge is open to vessels on the Newtown Creek and its six lanes of traffic are closed to vehicles. Both at those times and during rush hours, 11th Street backs up even farther north than the proposed school site.

Transit:

Conditions at all area subways are already over-crowded, especially at the AM & PM weekday peaks into Manhattan on the E, M, G and #7 trains.

ADA access to public transit should be studied as part of the Scope of Work.

Pedestrians:

In this historically industrial and mixed-use environment, the streetscape is often uninviting for pedestrians. There are numerous curb cuts and loading docks, a lack of street trees for shade, empty lots, and blank street frontages. The conceptual design framework for mixed-use streets of the *Western Queens Transportation Study* should help inform the EIS and provide qualitative information about the pedestrian experience along with the quantitative calculations proposed in the DSOW.

Private buses and shuttle vehicles connect many of the new developments that are remote from transit to the subway system. Commuters arriving by private buses clog the sidewalks around the station entrances and impede other pedestrians attempting to enter and exit.

The DSOW proposes to count a widened pedestrian sidewalk on the southern side of 45th Avenue as public open space. We disagree with this calculation. New developments should be required to meet DOT standards for adjacent sidewalks without being allowed to count them as "open space."

Parking:

The DSOW proposes to conduct only an off-street analysis for parking. We request that on-street parking also be added to the parking analysis.

On-street parking by special permission permits for the NYC Police Department in ADA sidewalk ramps at pedestrian crosswalks, in front of fire hydrants and in MTA bus-loading zones is particularly egregious and dangerous, centered as it is in all streets within two blocks of the John F. Murray Playground. This ongoing situation must be studied and reported on given its continuing negative impact on the quality of life in the study area.

Private Buses:

The plethora of private buses from new developments to transit stations is a daily phenomenon in LIC. Please add them to these transportation analyses.

School Buses:

Add school bus access to the Scope of Work for both the proposed school site on 11th Street and PS 78 on 5th Street just across the street from the proposed development.

The block on 47th Avenue where the new school is proposed currently proposed, and where students would be dropped off by school buses, is lined with small residences, manufacturing and auto repair businesses. The conceptual design framework for mixed-use streets of the *Western Queens Transportation Study* should help inform the EIS on this block.

Bus Rapid Transit

Bus rapid transit or select bus services should be considered along major thoroughfares in LIC.

Bicycles:

The EIS scope should address both the proposed waterfront greenway on this development site and other elements of a robust network for bicycles in LIC, such as bicycle infrastructure, rentals, parking, bike lanes, etc.

The Citibike program would be welcomed at the waterfront by the LIC community.

Ferries:

Ferries at both docking locations in LIC are already overcrowded at rush hours. The EIS scope should include the ferry system and analyze seasonal use considerations when other modes may be necessary.

Commuter Rail

The two Long Island Rail Road (LIRR) stations in Hunters Point provide important inter-modal connections for many commuters and should be considered in this transportation analysis. In addition, the possibility of a new station in Sunnyside Yards a few blocks to the east of the proposed rezoning for LIRR, NJ Transit and Metro North trains should be taken into account.

Air Traffic - Helicopters & Floatplanes

Similar to the weekend vehicular traffic to the Hamptons and other parts of Long Island, air traffic by helicopters and floatplanes on and over the East River increases on Friday afternoons

through Monday mornings. Given the proximity of the proposed rezoning to the heliport at East 34th Street in Manhattan and the use of the East River in this location as part of flight patterns, we request that the air traffic be analyzed as part of the Scope of Work.

BQX or Other Connector:

The Bronx-Queens Connector (BQX) is proposed to run along the eastern portion of the proposed development project. This major new transportation infrastructure should be thoroughly addressed in the EIS Scope of Work.

Even if the BQX does not move forward into implementation, the Scope of Work should consider the recommendations of the *Western Queens Transportation Study* for “Technology Corridor Transit Improvements” linking residential developments such as the proposed Anable Basin project with employment centers and NYCHA properties from LaGuardia Airport to Red Hook.

Pedestrian and/or Vehicular Bridge at 5th Street:

The proposed bridge extending 5th Street across Anable Basin to the north would greatly improve connectivity in the neighborhood. This link has been proposed since NYC’s first waterfront plans in the 1990s. We request that it be carefully considered and added to the Scope of Work to be studied as either a vehicular/bicycle/pedestrian bridge or a pedestrian/bicycle bridge with access for emergency vehicles.

44th Drive:

NYC DOT and the Department of Design and Construction (DDC) have targeted 44th Drive from the East River to Jackson Avenue, as part of the Hunters Point right-of-way rehabilitation project, for a series of improvements to turn it into a “green boulevard” connecting the recently renovated public pier with Court Square. Given the risks from sea level rise and storm surge in this low-lying area and the opportunity presented by proposed developments on both sides of the street from Vernon Boulevard to the East River, we recommend that the EIS examine the possibility of combining those improvements with new storm drainage infrastructure and consider elevating 44th Drive.

Emergency Evacuations:

The potential for emergency evacuations due to storms, flooding or terrorist incidents should be analyzed as part of the Scope of Work. The study should include how an additional 14,500+ people, including many families with young children, can be moved safely, rapidly and efficiently in this neighborhood with relatively narrow streets and already overcrowded mass transit.

Figure 17a – Proposed Traffic Analysis Locations

Add the following intersections to the proposed traffic analysis locations: Vernon Boulevard at 50th Avenue (key intersection at #7 subway entrance), Jackson Avenue at 46th Avenue (a DOT/DDC reconstruction project), and 45th Road at 11th Street and Jackson Avenue at 47th Road (access routes to the proposed school site). Label all streets.

Figure 17b – Proposed Pedestrian Analysis Locations

Additional locations for pedestrian analysis need to be added to evaluate the proposed 700+ students accompanied by parents walking to the 11th Street school site, approaches to John F. Murray Playground for children and adults pushing strollers with infants, and all the sidewalks at transit station entrances.

Task 15) Air Quality

The Anable Basin Rezoning proposes to introduce a new category of zoning uses entitled “Production/Light Industrial Use.” In order to determine the worst-case impacts on air quality to be analyzed by this EIS, it is important to define exactly what types of uses are allowed under this category and their potential to generate stationary or mobile sources of air pollution.

Task 16) Greenhouse Gas Emissions and Resiliency

The LIC community supports both adaptation measures for community resiliency and mitigation measures to address the causes of climate change like reducing greenhouse gas emissions. Very significant flooding took place in Hunters Point during Hurricane Sandy and disrupted the life of this community for months and years in terms of remediation to homes, closing and repair of schools, transit shutdowns and gas rationing, full and partial power outages, shorting and smoking of below-grade electrical lines, severe damage to public parks, public health hazards from sewage backups, and time-consuming recovery efforts for damaged businesses, manufacturing facilities and vehicles.

Climate Change Resiliency Assessment

Evaluations of potential progressive sea level rise and increases in storm frequency and intensity have community support in this low-lying neighborhood; however, the proposed focus on the potential impacts of climate change is too narrowly concentrated on flooding at the site alone. Secondary impacts of flooding in the surrounding areas will also affect this proposed development. Those impacts may include disruptions to public services and infrastructure, transportation interruptions, reductions of water quality, increased CSO discharges, and increased erosion of bulkheads both at the site and along the East River.

Given the seriousness of these impacts, the LIC community strongly supports the recommendation of the New York City in *A Stronger, More Resilient New York* to “Create an implementation plan for comprehensive flood-protection improvements on public and private property along the Williamsburg, Greenpoint, and Long Island City coastlines.” (Page 257) The opportunity to create a coordinated system of resilient coastal protection along the East River is, as stated earlier, one of the reasons we are calling for a broader EIS that addresses cumulative environmental impacts of the many interdependent projects taking place adjacent to Anable Basin.

In terms of modeling for this EIS, dynamic water modeling should be used in the assessment of potential flooding. We recommend using the National Weather Service’s model called Sea, Land, and Overland Surges from Hurricanes (SLOSH) with the composite approach to determine storm surge vulnerability for the LIC community. We are concerned that the proposed elevation of the Anable Basin site above the current base flood elevations (BFEs), if done in isolation, may actually displace water to other locations elsewhere in the area and produce additional flooding on surrounding properties. We are also concerned that the recent flood

control measures at the Queens Midtown Tunnel will displace the approximately 30 million gallons of water it stored during Hurricane Sandy and inundate the LIC community from the south, including reaching up to Anable Basin.

However, direct and secondary flooding is only two of the many resiliency issues facing New York City according to the New York Panel on Climate Change (NPCC). Other critical climate change issues to address in the Scope of Work are:

- Temperatures - Air temperatures are predicted to increase, making heat waves likely to become more frequent, intense and longer in duration. Among other impacts, these will increase peak electricity loads in the summer. In addition, water temperatures are predicted to rise. This will alter aquatic and wetland habitats, which in turn will impact bird migration, fish migration and other ecosystems along the East River.
- Precipitation – Annual rainfall is predicted to increase and be more intense. This will increase inland flooding, structural damage to buildings (such as, basement flooding and stress on foundations), street inundation, sewer flooding, and back flows of raw sewage. Residents of LIC are already being requested not to flush toilets during heavy rains.

In terms of methodology for assessment, we request that the most recent NPCC projections for New York City be used for the EIS evaluation of climate change.

We also understand that the Department of Environmental Conservation (DEC) has proposed amendments to the SEQRA regulations that would require assessment of impacts and vulnerabilities related to climate change. DEC is currently reviewing public comments on the amendments. Similarly, DEC's State Flood Risk Management Guidance is now under review at the governor's office. Some of the relevant guidelines for residential units call for the design elevation to be the higher of the elevation of the 0.2% annual chance flood, or an elevation calculated by adding the medium sea-level rise projection over the expected life of the structure plus two feet of freeboard to the current BFEs. If these changes are made, we request that this Scope of Work reflect them.

Task 17) Noise

The noise analysis is welcomed by the community; however, it assumes that all mechanical systems are or will be building-wide and noise-compliant. A number of buildings at Queens West have individual through-the-wall air conditioners that generate considerable noise. This issue will only increase as temperatures rise due to climate change and should be addressed in the EIS.

Task 20) Construction Impacts

We request that the following be added to the Scope of Work for construction impacts:

- Water quality
- Wind tunnels
- Site failures.

The LIC community has been in a state of constant construction since 2001 with numerous buildings at Queens West, Hunters Point South and the Court Square area. The construction impacts of this massive development project, which is projected to be built out over a period of 15 years to 2034, will have significant impacts on the LIC community for a very long period of

time. It is also projected by the New York Panel on Climate Change that, before 2030, sea levels will rise and both storms and heat waves will become more frequent and intense. These are again significant reasons for the cumulative environmental impacts of this proposed rezoning to be considered in combination with the other adjacent projects. They are all proposed to be under construction at the same or overlapping times and must be analyzed together.

A phasing plan for the construction of this project that minimizes its disruption of the neighborhood should be provided for in the Scope of Work.

Water Quality:

We request that Water Quality be added to the Scope of Work for construction impacts. There is no question that an almost 6 million square-foot project on a low-lying, landfill site with an existing high water table will impact the quality of ground water, water in Anable Basin, and the East River. Among the reasons for concern about water quality are pile-driving for construction of buildings, disturbances to the water table in the adjacent landfill and neighboring capped brownfield sites from demolition and cleanup, and added storm runoff both during construction and after the proposed development is completed.

Wind Tunnels:

With eight towers proposed as part of the proposed Anable Basin development, it can be anticipated that the wind tunnel effects will be significant both during and after construction. We request that wind impacts be added to the Scope of Work and correlated with the phasing plan.

Based on the proposed building heights of up to nearly 700', we also request that over-grade receptor locations be added to evaluate noise and vibration.

Site Failures:

Construction site failures ranging from minor delays to complete abandonments have major impacts on our community, including blockage of public rights-of-way, decreased pedestrian safety, fugitive dust, uncontrolled pests and the appearance of a blighted community. Two notorious examples in our neighborhood are 1) the Tennis Club waterfront site just north of the proposed EDC project which is now inundated and 2) the through block lots across 46th Road from the proposed Anable Basin Rezoning that were supposed to have been developed as a CUNY community facility adjacent to the Maximillian which, after six years of rat infestation, appears to have been abandoned. There are dozens of other examples equally distributed throughout the district. We request that this foreseeable construction failure rate, whether caused by the economy or mismanagement, be factored into the 15-year construction impact analysis of the Anable Basin proposal on a cumulative basis with other failed sites in the area.

Task 21) Alternatives

We request consideration of a moderate-density alternative, for example, one where the Special Hunters Point Mixed Use District is extended into these blocks. Please see the sections above on Background (pages 4 and 5) and Zoning Map Change (pages 6 and 7) for more information on this alternative.

Task 23) Summary Chapters

Growth-Inducing Aspects of the Proposed Actions

As the EIS team considers the growth-inducing aspects of the proposed Anable Basin Rezoning, we would like to reiterate that The Court Square Civic Association, Hunters Point Civic Association, Hunters Point Community Coalition, and Long Island City (LIC) Coalition support sustainable development and well-planned growth that benefits existing as well as new residents and business owners, protects the quality of life and our environment, is proactive about climate change and resiliency, increases social equity, and distributes economic development fairly.