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Queens Community Board 2 Comments on the OneLIC EIS Draft Scope of Work. (CEQR No. 25DCP001Q)

- I. **Queens Community Board 2 strongly supports the stated goals of the Long Island City Neighborhood Plan as outlined on page 2 of the Introduction to the Draft Scope of Work dated July 12, 2024. We agree:**
 - that Long Island City is in desperate need of more affordable housing and that the existing modestly priced housing should be preserved,
 - that there is currently insufficient park space, that the Neighborhood Plan should include the addition of sufficient new park space to bring the park space ratio up to current City standards, and that this space should be located throughout the study area so as to be within easy walking distance for all residents
 - that multi-modal transportation improvements are required,
 - that existing businesses should be supported and enabled to thrive, and
 - that the area faces severe current and future environmental challenges, including storm surges along the waterfront, on-going sea level rise, inadequate combined sewers and increased frequency of inland flooding, and that any proposed Actions by the City, including those that enable “planned development and population growth” should mitigate rather than exacerbate the effects of these challenges.

We also note that LIC overall has added about 25,000 units within the past 20 years and been the fastest growing community in the US on a “units added per square mile” basis. The “Study Area History” on pages 4 and 5 of the DSOW omits any account of this recent construction and population boom, or the resulting changes in the neighborhood character. This omission in the narrative should be corrected.

To date the City has not implemented sufficient infrastructure improvements in storm sewers, public transit capacity or additional park space to support the population growth that has already taken place within the Context Area defined by the Study. As previously stated in the Stipulations which accompanied our approval for the City of Yes for Housing Opportunity Text Amendments, the cumulative effects of this recent development should be mitigated prior to implementation of any new actions that would result in massive additional growth.

- II. **Queens CB2 disagrees with the DSOW's characterization of the planning process to date.** On p.16 the DSOW states that “The Proposed Actions reflect DCP’s on-going community engagement process with local Community Boards, community residents, business owners, community-based-organizations, ...to achieve the following land use objectives”. Since the announcement of the OneLIC planning initiative in Fall 2023, DCP has not engaged with CB2 beyond inviting members to participate in their “Visioning Sessions” as individuals. These three sessions allowed only for atomized anonymous individual comments on Post-It notes and furthermore:
1. They did not offer any opportunity for CB2 or other established local community groups of long-standing to engage in meaningful dialogue or to offer the perspectives of volunteer members with deep knowledge and long histories in the neighborhood.
 2. They provided only very broad demographic and physical data about the existing area but did not discuss or present any of the numerous Proposed Actions outlined on pages 2 and 3 of the DSOW, beyond a single technical map of proposed rezonings at Session 3. This map was presented without any 3-D information that might have allowed participants to visualize the potential effects of the proposed changes or to compare them with the surrounding area. None of the other Proposed Map Changes or Disposition Items outlined in the DSOW were presented in draft form, or even discussed.
 3. Session 3 took place on June 24, after the final CB2 Full Board meeting of the spring and during the summer recess. Thus there was no opportunity for Board discussion of even the minimal information that was presented prior to the DSOW Hearing on August 12, also scheduled during the Board recess.

- III. **Based on our concerns outlined above about the process to date, and its inaccurate characterization in the DSOW, CB2 urges DCP to undertake a much broader discussion of possible Actions starting early this fall, prior to finalizing any Proposed Actions to be certified for the ULURP process. These additional meetings with CB2 and other local advocacy groups should be documented as part of the public record.** If this means slowing the process down somewhat, we feel that is appropriate. A more thorough review by residents, local community organizations, city-wide advocacy groups and elected officials is critical to achieving a well-thought-out and innovative Neighborhood Plan with buy-in from the community. Many community residents rely on the Board for granular information about important local initiatives and changes, so the communication needs to be open and on-going.

Nonetheless, and despite not receiving most of the additional information and clarifications which we recently requested from DCP, CB2 offers the subsequent comments based on our long-standing concerns, our responses of record to earlier rezoning proposals and Text Amendments (including City of Yes) and on what we can surmise from the outline of Proposed Actions as well as the analyses and methodologies described in the DSOW. We hope that these comments will help to inform a more inclusive process going forward.

- IV. **PROPOSED RE-ZONING TO PERMIT HIGHER DENSITY MIXED-USE DEVELOPMENT, RESULTING IN INCREASED POPULATION GROWTH –** The Proposed Zoning shown in Figure 4 of the DSOW is an intricate hodgepodge, including multiple differing “paired zones” to allow both manufacturing and residential uses, varying in some cases block by block. A full rationale for this variety of zones was not offered in the Public Visioning Sessions. But as indicated in the DSOW Introduction, the overall effect of these proposed changes would be a much higher density neighborhood within the limited

boundaries defined for study, with the anticipated construction of approximately 14,000 new dwelling units.

CB2 supports the Text Amendment on p.2 to add Mandatory Inclusionary Housing (MIH) requirements for all rezoned areas that permit residential construction. We also support the expansion of the applicability of Zoning for Transit Accessibility to the Project Area.

While fully aware of our serious national housing crisis, in particular the need for more affordable housing, and having supported substantial new development over the last 20 years, CB2 nonetheless has the following major concerns:

- 1. TASK 22. ALTERNATIVES, in the DSOW requires the analysis to include a “lesser density alternative” if it “would have the potential to reduce the impact of the Proposed Actions while, to some extent, still meeting the action’s stated purpose and need.” Based on Community input to date and on previous concerns expressed by CB2, as well as the environmental vulnerability of the study area, CB2 feels that the EIS should clearly include a significantly lower-density Alternative to the proposed rezoning Actions.**

A credible CEQR analysis must include a realistic assessment of the cumulative impacts of the Proposed Actions under study. This is especially critical for this extraordinarily complex package of actions intended to enable dense, multi-use development in a 54-block district, overlaid on two decades of massive recent growth throughout the Context Area. CB2 anticipates that an honest CEQR analysis of both Proposed Action Alternatives will reveal unacceptable cumulative impacts. Failure to include a more modest mid-range development alternative misses an opportunity to conclude the CEQR phase with a viable package, identifying manageable impacts that can be mitigated to the benefit of existing residents and businesses and the newcomers that the City wants to accommodate in this neighborhood.

2. The addition of 14,000 units would be a 56% increase in new units in an area where many development sites are within the Flood Zone and projected sea level rise will affect even more sites in the near future.
3. Based on proposed MIH requirements, only about 4,000 of these would meet the City’s criteria for “affordable” at a variety of income levels, and even these would not be truly affordable to many low-income residents, including senior citizens and those currently unhoused.
4. This proposed massive development contradicts the stated goals of the City of Yes for Housing Opportunity, which include spreading additional housing growth more equitably throughout the city. The concentration of new housing development permitted under the proposed Actions would increase rather than reduce this inequity.
5. More modest new residential development would also make it more likely that existing businesses within the IBZ zone could continue to function and thrive, which is a stated goal of this Neighborhood Plan.
6. CB2 also urges that DCP’s study be broadened to other nearby areas within the boundaries of our Board as well as neighboring Boards. Outside of the IBZ zones

there are numerous commercial and industrial sites along existing transit corridors where previous business models have evolved and land is substantially underutilized. **We believe that sustainable growth is possible within Western Queens without overburdening Long Island City to such a severe degree.**

V. PRESERVATION AND ADAPTIVE RE-USE OF CITY-OWNED PROPERTIES FOR PUBLIC AMENITIES – CB2 opposes the proposed “PP” actions to dispose of

Non-Residential City Owned Property close to or on the waterfront. Over the past 10 (?) years CB2 has repeatedly recommended that the DOE Building be preserved and adapted for much-needed community amenities, and the adjacent parking lot and DOT-owned site for public recreation space.

Given the overall scarcity of City-owned property within the CB2 district and the lack of public amenities to support a neighborhood which has experienced such rapid growth, it is unconscionable that the City would propose turning these properties over to private development.

CB2 recognizes that the DOE Building is very large, and that neither neighborhood resources nor city funds may currently be in place to renovate the entire building. But a phased renovation over time is both practical and desirable, as it would allow new public functions, even possibly one or two schools, to be programmed and completed based on evolving neighborhood needs. (The phased rehabilitation and on-going re-use of the Brooklyn Army Terminal is a good example of a large City-owned structure being redeveloped over time.) And from an environmental point of view, preserving and adapting the existing structure is far more sustainable than the demolition and new construction implied by the proposed disposition and rezoning.

VI. A RESILIENT AND BEAUTIFUL PUBLIC WATERFRONT – The redevelopment of the waterfront from Anable Basin north to Queensbridge Park represents an unparalleled opportunity for the creation of stunning public open space which would tie together the communities north and south of the Queensboro Bridge and become a city-wide destination. But given the vulnerability of the area to storm surge and sea level rise, it is essential that all available city, state, federal and private expertise on coastal flood mitigation be brought to bear on the design of this space, which is not an easy task with a single obvious solution. Our understanding of current City policy is that such development should fall under the supervision of the DEP Bureau of Coastal Resilience, but we do not see their participation mentioned in the DSOW.

Much of the success of the waterfront development south of Anable Basin has been due to the combination of continuous public pedestrian and bike ways with additional park land, particularly at Hunters Point South where the adjacent park incorporates features of natural resiliency that also accommodate public recreation. CB2 urges that the proposed Action to modify the Northern Hunters Point Waterfront Access Plan be undertaken in direct conjunction with the physical planning of and a City commitment to new public park space. Given the high volume of pedestrian and bike use further south, revisions to the WAP should include widening the standard 40-foot-wide walkway width to accommodate both anticipated bike and foot traffic and natural flood proofing. The revised WAP should also include continuation of the Blissville / LIC Greenway currently being implemented by DOT.

We also urge that DCP reach out and coordinate with other waterfront planning efforts for this same area , including the one currently being undertaken by Long Island City and Hunters Point Coalitions (LICC/HPCC) and funded by the State. It makes no sense for publicly funded and qualified expertise not to be engaged in this process!

Lastly, from both an urban design and an equity point of view, the incorporation of new public park space and a significant community amenity (i.e. a re-used DOE building) will create a more welcoming and more visually interesting public waterfront than a continuous row of new, predominantly market-rate residential towers.

VII. PROPOSED CHANGES TO THE LIC INDUSTRIAL BUSINESS ZONE (IBZ) -

As residential growth gained momentum through the 2000s and up to the present, the City took steps to preserve and nurture LIC's manufacturing and industrial activity by creating a protected Industrial Business Zone (IBZ). The OneLIC plan to upzone the IBZ aims to increase density in areas traditionally reserved for industrial purposes. While this approach might have benefits, there are significant negative impacts that will require mitigation and/or revised planning.

Increasing height and density in urban areas with the aim of reducing commercial rents is a common proposal, but it doesn't always lead to lower rents for the following reasons:

- 1. Demand Outstripping Supply:** If the demand for commercial space is high, increasing the supply through greater density may not be sufficient to lower rents. This is particularly dependent on the time it will take to redevelop. In the interim of an unpredictable number of years landlords will maintain or increase rents.
- 2. Market Speculation:** Developers and property owners might anticipate that the new, higher-density areas will become more desirable, leading to speculative investment. This will drive up rents rather than decrease them, as property owners seek to capitalize on perceived future value.
- 3. Increased Construction Costs:** Higher density developments come with increased construction and infrastructure costs, such as the need for specialized foundations, elevators, and additional utilities. These costs will likely be passed on to tenants in the form of higher rents.
- 4. Local Market Conditions:** Local economic conditions and the overall health of the commercial real estate market play a significant role in determining rents. In areas where the economy is strong and businesses are thriving, rents tend to remain high despite increased density.
- 5. Loss of Jobs:** The increased pressure on existing businesses and obstacles to businesses hoping to start up now or in the very near future will lead to job losses and a potential decline in local manufacturing capacity. It will also become an obstacle to innovation.
- 6. Supply Chain Issues:** Industries located in IBZs often rely on proximity to other industrial facilities for their supply chains. Disrupting these zones could create inefficiencies and increase costs for businesses that are integral to local and regional economies.

7. Disruption of Existing Micro-Economy: For many years speculation within the IBZ caused many properties to be warehoused. Eventually small businesses, makers, and creative industries were able to get a foot in the door within the IBZ. A hostel emerged as well as cafes, breweries, and artisan businesses. These small businesses have managed to grow and even hold on during the covid emergency where other businesses in high rent districts could not. The proposed upzone provides no means to preserve these businesses other than the long range theory that building more will bring rents down. These businesses will be displaced well before the theoretical benefit is reality.

8. Gentrification Effects: Increased density leads to gentrification, where the influx of higher-income businesses drives up property values and rents. This will further impact the proposed mixed use areas that border the IBZ. The new developments will attract more affluent tenants, raising rents for everyone, including existing businesses and neighboring long-standing residents.

9. Neighborhood Transformation: While aesthetically beneficial, the transformation of an area due to higher density can lead to changes in the neighborhood's character and attractiveness. As areas become more desirable, landlords will raise rents to reflect the new, upscale nature of the district.

10. Infrastructure Strain and Health Concerns: Upzoning historically leads to an intensive long term development period. The additional construction and increased population density could also exacerbate environmental degradation. There will be higher traffic volumes, higher demand on the already crowded subways, and the already overburdened sewer system. This could impact areas that were not designed to handle the increased load, affecting both industrial and surrounding residential areas. The construction period will lead to inefficiencies, disruptions. It will create air pollution and noise.

Conclusion:

The OneLIC plan offers no plan to prevent or mitigate the above issues. It offers only a theoretical opinion that rents will decrease if density increases. But this flies in the face of what we have historically witnessed in Long Island City. The residential and commercial offerings have expanded but rents continue to dramatically increase.

The EIS needs to base its conclusions on actual market data not theory. Projections need to take into account historic trends so that the presumed supply vs demand graph takes into account factors that can cause demand to continue to outpace supply. Additionally the EIS needs to compares the impact of the proposed plan with a far more moderate upzoning Alternative rather than just the No Action condition.

The EIS needs to take into account how former “with-action” assumptions have corresponded to reality. The Municipal Arts Society has an informative report on how prior assumptions for Zoning in Long Island City have led to negative unintended consequences and why CEQR needs to incorporate actual resulting data into mitigation requirements: <https://www.mas.org/wp-content/uploads/2021/03/ceqr-report-2021.pdf>

Finally if the OneLIC proposal is to move forward in any form it needs to take a slow and measured approach where the infrastructure improvements are completed before a new Zoning is in effect. Similarly, well before a new Zoning is in place, City agencies such as EDC need to make significant investments that target existing micro and small businesses and creative operations.

The worthy aim to provide greater affordability in the IBZ should not be at the expense of destroying businesses, jobs, and opportunities within the IBZ. Investments need to be made in what already exists and is likely threatened not in an imagined future.

VIII. PROPOSED STREET RE-MAPPINGS AND ANTICIPATED TRANSIT

IMPROVEMENTS – New York City is in a pivotal transformation from outmoded and unsafe last-century street design into a streetscape that protects, serves, and delights all road users. The Neighborhood Plan must embrace the needs of a multimodal society by including roadways, sidewalks, and transit connections for today and the future.

Proposed street remapping and re-zoning to increase density create an opportunity and a need to redesign our streets to achieve several of the city's goals, as described in the current Streets Plan:

1. Achieve Vision Zero and end road casualties using the NYC DOT's toolbox, including: daylighting at every intersection; raised crosswalks and shorter pedestrian crossings; protected bike lanes; hardened barriers that prevent conflict between automobiles and more vulnerable road users; turn calming; and slow speed, low traffic neighborhood zones.
2. Connect people to transit. New subway stations and entrances with ADA-compliant infrastructure will allow access for all. More frequent, faster subway service will ensure that subway stops in this area, the first or last stops in Queens, aren't perpetually overcrowded. The possibility of a new subway stop nearer the waterfront should be studied. A regional passenger rail train station in the Sunnyside Yards area, as long planned, would relieve over-capacity subway trains and connect more travelers to Long Island City businesses. Bus service should be complete, efficient, and comfortable. Dedicated bus lanes on the Queensboro Bridge and in the Midtown Tunnel would create vital new connections between Long Island City and Manhattan.
3. Expand NYC Ferry ridership and increase transit access. A new ferry landing near the Queensboro Bridge will serve the densely-populated communities both north and south of the bridge, including Queensbridge, the Queens Plaza-adjacent businesses, and this newly rezoned neighborhood.
4. Complete the Queens Waterfront Greenway. City-owned property on the waterfront should be built into publicly-accessible parkland that expands and elevates the Greenway in its current form. The Vernon Blvd. section in the neighborhood plan is currently industrial, dangerous, incomplete, and unpleasant. Opening the waterfront area to green space will allow the protected bike path and pedestrian pathway to be redesigned for maximum aesthetic impact, safety, and separation from automobile traffic.
5. Cycling and micromobility use should be safe and easy. Bike lanes that are fully separated from automobile traffic and protected by hardened barriers or parked vehicles, where relevant, both protect cyclists and other micromobility users and encourages greater waves of new cyclists. Bike lanes are only successful so long as they are part of a complete network of safe and easy-to-navigate paths that allow

full access within communities and connections to other neighborhoods. The protected bike lanes in Long Island City should be completed and expanded, and the planned Blissville Greenway should be completed. The neighborhood plan must include protected bike lanes on all streets as roadway space is remixed for new uses and needs. There must also be adequate bike parking, including secure bike parking, and sufficiently available Citibike docks.

6. Every New Yorker is a pedestrian. Neighborhood sidewalks must be built wide and level, and must be made to accommodate multiple uses comfortably and with visual delight. In the most population-dense neighborhoods of the city, sidewalks have traditionally been built as wide as roadways, and frequently today, roadways have become Open Streets and plazas. The pedestrian is the most important and most vulnerable street user and a new neighborhood plan must serve and protect them. Obstacles for the pedestrian must be moved into the roadway where possible (e.g., trash cans, Citibike docks) and sidewalks should be lined with trees and benches and protected with planters. Sidewalks should bump out into crosswalks to provide shorter crossings and better visibility. Plazas and Open Streets should be planned for community use and recreation.
7. Cars and trucks are a part of the mix of street use, but their roles must be reduced in population-dense and transit-rich neighborhoods. As roadways get remixed for multiple uses, there is less space for automobile traffic, and in Long Island City, on-street parking is insufficient for heavy automobile dependency. Street space must also include loading zones and last-mile delivery, and all street parking should be metered to create more turnover for vehicles. Creating safer bike paths and more comfortable sidewalks and building better connections with more transit options will induce demand for those modes and reduce dependence on automobiles.

Many of these points were named in the Scope of Work, but often too generally. The planning outlined in the DSOW is too reliant on Level of Service (LOS) goals for automobiles and minimum-required transit service. For a safer, healthier, and more vibrant neighborhood that accommodates all, the Plan must include a vision for a new streetscape using tools the city is currently employing in its most dense neighborhoods.

IX. EVALUATION OF NEEDED INFRASTRUCTURE IMPROVEMENTS AND AMENITIES, WITH CITY COMMITMENT FOR COMPLETION PRIOR TO FURTHER DEVELOPMENT – CB2 insists that any zoning changes to allow higher densities and significant new residential and commercial development must be contingent upon firm commitments and implementation plans from the City to provide the necessary supporting infrastructure and amenities upfront. Merely stating that mitigation measures will be explored in the EIS is unacceptable.

The substantial increases in population projected under the Reasonable Worst Case Development Scenarios outlined in the Draft Scope of Work -- up to nearly 14,000 new dwelling units -- will inevitably strain existing community facilities, open spaces, transportation systems, and infrastructure capacity if not properly accounted for. We cannot allow the mistakes of the past, where neighborhoods were rezoned for growth without the schools, parks, transit improvements, sewer upgrades and other amenities in place first.

To ensure that the livability of the LIC neighborhood is maintained and enhanced, not compromised, as growth occurs, the following infrastructure investments and facilities must be fully committed to before any new development facilitated by the proposed zoning actions is permitted:

Schools & Community Facilities:

- Construct new school seats and child care/daycare center capacity to meet projected demand and maintain appropriate utilization levels, based on binding commitments from DOE/SCA
- Identify specific sites, funding sources, and timelines for new school/childcare facility construction
- Commit to providing a new hospital or medical facility to serve the growing population

Open Spaces & Parks:

- Create new public parks and open spaces beyond just waterfront access areas, including amenities like playgrounds, pools, other active recreation facilities, and plazas
- Identify specific areas for new open spaces that relate to neighborhood density and increase open space ratios to meet the City's current standards.
- Secure dedicated capital funding for park expansions and upgrades to existing parks/playgrounds

Transportation Improvements:

- Implement road/intersection reconfigurations, signal timing changes, new bike lanes, sidewalk widenings, and other measures to improve traffic operations and pedestrian/cyclist safety
- Require transit facility upgrades like new subway entrances/mezzanines and bus infrastructure to increase circulation capacity
- Identify specific projects, funding, timelines, and mechanisms to ensure improvements are built

Sewer & Water Infrastructure Upgrades:

- Increase wastewater treatment capacity at Bowery Bay facility to handle projected sewage volumes
- Replace antiquated sewers and install sustainable stormwater management systems throughout the Context Area to control runoff and combined sewer overflows
- Secure capital commitments and timelines from DEP to ensure that this work occurs before new development

The City must quantify the required facilities, set clear benchmarks, and establish a phasing plan where the provision of new infrastructure and amenities is front-loaded and precedes further new development. Binding agreements and contracts locking in these commitments should be required for any private development taking advantage of the new zoning.

Simply put, we cannot accept a scenario where thousands of new residential units are built and our schools, parks, roads, and sewers remain overwhelmed. The infrastructure to support sustainable neighborhood growth must come first. Securing these investments upfront is an absolute prerequisite for CB2 to support any zoning changes proposed through the LIC Neighborhood Plan.

<https://www.youtube.com/live/r5bld9HjWc0?si=RTRrjSEwWQXSwAQA&t=535>
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