Chapter 28: Response to Comments on the DEIS[1]

A. INTRODUCTION

This chapter of the Final Environmental Impact Statement (FEIS) summarizes and responds to substantive comments received during the public comment period for the Draft Environmental Impact Statement (DEIS), issued on April 18, 2025 for the Proposed Actions.

City Environmental Quality Review (CEQR) requires a public hearing on the DEIS as part of the environmental review process. A public hearing was held in conjunction with the New York City Planning Commission (CPC) hearing on the land use applications on February 19, 2025, to afford all interested parties the opportunity to submit oral and written comments. To allow for broad public participation, the public hearing was held both in-person and remotely via the teleconferencing application Zoom. The comment period remained open through 5:00 pm on August 11, 2025.

Section B lists the organizations and individuals who commented on the DEIS. Section C contains a summary of relevant comments on the DEIS and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the EIS. Where more than one commenter expressed similar views, those comments have been grouped and addressed together. Commenters who expressed general support or general opposition but did not provide substantive comments on the DEIS are listed at the end of Section C. All written comments are included in Appendix J, "Written Comments Received on the DEIS."

B. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT SCOPE OF WORK[2]

COMMUNITY BOARDS

1. Queens Community Board No. 2, letter dated June 20, 2025 (CB2_Queens_002)
2. Queens Community Board No. 2, Arts and Culture Committee, letter dated June 5, 2025 (CB2_Queens_010)
3. Anatole Ashraf, Chair, Community Board No. 2, verbal comments delivered on July 30, 2025 (Ashraf_CB2_075)
4. Brooklyn Community Board No. 1, letter dated May 15, 2025 (CB1_Brooklyn_147)
5. Queens Community Board No. 1, letter dated June 25, 2025 (CB1_Queens_150)

[1] This chapter is new to the FEIS.

[2] Citations in parentheses refer to internal tracking references.

ELECTED OFFICIALS

6. Julie Won, Council Member, 26th District, New York City Council, letter dated August 4, 2025 (Won_NYCC_051)

ORGANIZATIONS AND BUSINESSES

7. Tom Paino, RA, Founder and President, Hunters Point Community Coalition, and Lisa Goren, President, Long Island City Coalition, letter dated June 6, 2025 (LICC-HPCC_001)
8. Chad Purkey, Vice President, Association for a Better New York, letter dated July 25, 2025 (Purkey_ABNY_003)
9. Chad Purkey, Vice President, Association for a Better New York, letter dated July 25, 2025 (Purkey_ABNY_003)
10. Kenneth Adams, President, LaGuardia Community College, letter dated July 30, 2025 (Adams_LCC_021)
11. Marlene Dodes-Callahan, Director, CityLights, letter dated July 29, 2025 (Dodes-Callahan_CL_023)
12. Myron Glucksman, Treasurer and Board Member, CUNY Graduate Center Foundation, Inc., letters dated July 29, 2025 and July 30, 2025 (Glucksman_CUNYGCF_025, Glucksman_CUNYGCF_043)
13. Peter Darrow, Board Chair, CUNY Graduate Center Foundation, Inc., letter dated July 30, 2025 (Darrow_CUNYGCF_027)
14. Peter Papamichael, The Vorea Group, letter dated July 30, 2025 and verbal comments delivered on July 30, 2025 (Papamichael_TVG_028, Papamichael_TVG_091)
15. Simon Heffner, Executive Vice President, Empire City Iron Works, letter dated July 29, 2025 (Heffner_ECIW_029)
16. Thomas Mituzas, Blissville Civic Association, letter dated July 30, 2025 (Mituzas_BCA_030)
17. Daniel Chan, Board Member, Biotech Without Borders, letter dated July 30, 2025 (Chan_BWB_034)
18. Michael Lewyn, Professor, Touro Law Center, and Director, Institute on Land Use and Sustainable Development, letter dated July 30, 2025 and verbal comments delivered on July 30, 2025 (Lewyn_TLC_042, Lewyn_TLC_095)
19. Peter Bermingham, Cement and Concrete Workers – DC 16, letter dated July 30, 2025 (Bermingham_DC16_044)
20. William Jessop, National Acoustics Holdings, Inc., letter dated July 31, 2025 (Jessop_NAH_047)
21. Alan Suna, Chairman, Silvercup Studios, letter dated August 1, 2025 (Suna_SS_048)
22. Laura Wolf-Powers, Western Queens Community Land Trust, letter dated August 4, 2025 (Wolf-Powers_WQCLT_052)
23. Pam Herrera, Land Justice Coordinator, Western Queens Community Land Trust, verbal comments delivered on July 30, 2025 and letter dated August 4, 2025 (Herrera_WQCLT_054, Herrera_WQCLT_073)
24. Jordan Hare, Director of Planning and Development, Plaxall, verbal comments delivered on July 30, 2025 and letter dated August 1, 2025 (Hare_Plaxall_055, Hare_Plaxall_089)

25. Rachel Suna Britchkow, Vice President of Asset Management, Hackman Capital Partners, letter dated August 4, 2025 (SunaBritchkow_HCP_056
26. Andrea Mungo, Western Queens Community Land Trust, letter dated August 5, 2025 (Mungo_WQCLT_058)
27. Ernest Brooks, Long Island City Coalition, Western Queens Community Land Trust, verbal comments delivered on July 30, 2025 and letters dated August 5, 2025 and August 6, 2025 (Brooks_LICC_WQCLT_059, Brooks_LICC_WQCLT_066, Brooks_LICC_WQCLT_118)
28. Rachel Brown, Steering Committee, Western Queens Food Co-op, verbal comments delivered on July 30, 2025 and letter dated August 5, 2025 (Brown_WQFC_061, Brown_WQFC_065)
29. Christina Chaise, Ravenswood Resident Association & Justice For All Coalition, verbal comments delivered on July 30, 2025 (Chaise_RRA_063)
30. Sojung Kim, Regional Plan Association, verbal comments delivered on July 30, 2025 (Kim_RPA_067)
31. Edjo Wheeler, Culture Lab LIC, verbal comments delivered on July 30, 2025 (Wheeler_CLLIC_068)
32. Carlo Casa, New York Building Congress, verbal comments delivered on July 30, 2025 (Casa_NYBC_070)
33. Connie Butler, MoMA PS1, verbal comments delivered on July 30, 2025 (Butler_MoMAPS1_071)
34. Jenny Dubnau, Western Queens Community Land Trust, verbal comments delivered on July 30, 2025 and letter dated August 6, 2025 (Dubnau_WQCLT_072, Dubnau_WQCLT_126)
35. Paula Kirby, Plaxall, verbal comments delivered on July 30, 2025 (Kirby_Plaxall_086)
36. Charles Yu, Long Island City Partnership, letter dated July 29, 2025 and verbal comments delivered on July 30, 2025 (Yu_LICP_099, Yu_LICP_115)
37. Maddie Decerbo, REBNY, verbal comments delivered on July 30, 2025 (Decerbo_REBNY_101)
38. Kyle Sharaf, Baron Property Group, verbal comments delivered on July 30, 2025 (Sharaf_BPG_102)
39. Amy Hau, Director, Noguchi Foundation, letter dated August 7, 2025 (Hau_NF_107)
40. Carmen Ciobotea, Sweeney Carpenters and Juice Joint, letters dated August 8, 2025 (Ciobotea_SC_113, Ciobotea_JJ_149)
41. Daniel Taylor, Member, Queensbridge Old Timers' Committee, letter dated August 11, 2025 (Taylor_QOTC_117)
42. Isabella Bustamante, Executive Director, Teen Art Salon, letter dated August 7, 2025 (Bustamante_TAS_125)
43. Laura Rothrock, Long Island City Partnership, letter dated August 8, 2025 (Rothrock_LICP_133)
44. Lisa Goren, Long Island City Coalition and Hunters Point Community Coalition, letter dated August 7, 2025 (Goren_LICC-HPCC_134)
45. Ronald F. Day, Chief Operating Officer, The Fortune Society, letter dated August 7, 2025 (Day_TFS_141)
46. Sohrab Mohebbi, Director, SculptureCenter, letter dated August 7, 2025 (Mohebbi_SC_144)

GENERAL PUBLIC

47. Fanny Chang, letter dated July 25, 2025 (Chang_004)
48. Andrew Fowler, letter dated July 27, 2025 (Fowler_005)
49. Okki Fowler, letter dated July 27, 2025 (Fowler_006)
50. Paoling Hsia, letters dated July 30, 2025 and August 12, 2025, and verbal comments delivered on July 30, 2025 (Hsia_007, Hsia_090, Hsia_137)
51. Adam Joly, letter dated July 30, 2025 (Joly_008)
52. Andrew Wax, letter dated July 29, 2025 (Wax_009)
53. Charles Wang, letter dated July 30, 2025 (Wang_011)
54. Crystal Zhu, letter dated July 29, 2025 (Zhu_012)
55. David Cheung, letter dated July 29, 2025 and verbal comments delivered on July 30, 2025 (Cheung_013, Cheung_088)
56. Emily Smith, letter dated July 30, 2025 (Smith_014)
57. Grace Sprite, letter dated July 29, 2025 (Sprite_015)
58. Haktan Bor, letter dated July 29, 2025 (Bor_016)
59. Heidi Holterbosch, letters dated July 30, 2025 (Holterbosch_017, Holterbosch_035)
60. Helmut Carter, letter dated July 29, 2025 (Carter_018)
61. Joanne Zhou, letter dated July 29, 2025 (Zhou_019)
62. Karesia Batan, letter dated July 30, 2025 and verbal comments delivered on July 30, 2025 (Batan_020, Batan_098)
63. Leo Guttman, letter dated July 30, 2025 (Guttman_022)
64. Michael Zoorob, letter dated July 29, 2025 (Zoorob_024)
65. Payal Bor, letter dated July 29, 2025 (Bor_026)
66. YC Steg, letter dated July 29, 2025 (Steg_031)
67. Alex Maza, letter dated July 31, 2025 (Maza_032)
68. Christine Hunter, letter dated July 30, 2025 and verbal comments delivered on July 30, 2025 (Hunter_033, Hunter_076)
69. Ivy Pan, letter dated July 31, 2025 (Pan_036)
70. Jacob Stein, letter dated July 30, 2025 (Stein_037)
71. Jasper Wu, letter dated July 30, 2025 and verbal comments delivered on July 30, 2025 (Wu_038, Wu_106)
72. Johann Anesh, letter dated July 31, 2025 (Anesh_039)
73. Kenneth Greenberg, letter dated July 30, 2025 and verbal comments delivered on July 30, 2025 (Greenberg_040, Greenberg_064)
74. Lou Venech, letter dated July 30, 2025 (Venech_041)
75. Thomas Ort, letter dated July 30, 2025 (Ort_045)
76. Tyler Baldwin, letter dated July 30, 2025 (Baldwin_046)
77. Bali Harmath, letter dated August 4, 2025 (Harmath_049)
78. Hannah Berson, letter dated August 2, 2025 (Berson_050)
79. Minakshi Mohanta, letter dated August 1, 2025 (Mohanta_053)
80. Sumantro Das, letter dated August 4, 2025 (Das_057)
81. Nina Rappaport, letter dated August 5, 2025 (Rappaport_060)
82. Mandana Limbert, verbal comments delivered on July 30, 2025 (Limbert_062)
83. Rachel Cohen, verbal comments delivered on July 30, 2025 (Cohen_069)
84. Senjuen Hsia, verbal comments delivered on July 30, 2025 (Hsia_074)
85. Crystal Xu, verbal comments delivered on July 30, 2025 (Xu_077)
86. Salvatore Franchino, verbal comments delivered on July 30, 2025 (Franchino_078)

87. Eric Narburgh, verbal comments delivered on July 30, 2025 (Narburgh_079)
88. Austin Celestin, verbal comments delivered on July 30, 2025 (Celestin_080)
89. Ciaran Gallagher, verbal comments delivered on July 30, 2025 (Gallagher_081)
90. Rob Basch, verbal comments delivered on July 30, 2025 (Basch_082)
91. Kevin Dantonio, verbal comments delivered on July 30, 2025 (Dantonio_083)
92. Vishnu Reddy, verbal comments delivered on July 30, 2025 (Reddy_084)
93. Leo Guttmann, verbal comments delivered on July 30, 2025 (Guttmann_085)
94. Barbara Etzel, verbal comments delivered on July 30, 2025 (Etzel_087)
95. Farzad Khosravi, verbal comments delivered on July 30, 2025 (Khosravi_092)
96. William Xu, verbal comments delivered on July 30, 2025 (Xu_093)
97. Dan Miller, verbal comments delivered on July 30, 2025 (Miller_094)
98. Valentin Canuci, verbal comments delivered on July 30, 2025 and letter dated August 12, 2025 (Canuci_096, Canuci_146)
99. Erik Nilsen, verbal comments delivered on July 30, 2025 (Nilsen_097)
100. Leonard Quigley, verbal comments delivered on July 30, 2025 (Quigley_100)
101. Emilia Decaudin, verbal comments delivered on July 30, 2025 (Decaudin_103)
102. Daniel Chandross, verbal comments delivered on July 30, 2025 (Chandross_104
103. Mark Natanawan, verbal comments delivered on July 30, 2025 (Natanawan_105)
104. Angelo Motola, letter dated August 12, 2025 (Motola_108)
105. Anthony Cavaliere, letter dated August 11, 2025 (Cavaliere_109)
106. Anthony Motola, letter dated August 11, 2025 (Motola_110)
107. Balazs Harmath, letter dated August 8, 2025 (Harmath_111)
108. Buzas Josef, letter dated August 8, 2025 (Josef_112)
109. Castillo Eder, letter dated August 8, 2025 (Eder_114)
110. Christian Hansen, letter dated August 6, 2025 (Hansen_116)
111. Erving Pecollari, letter dated August 9, 2025 (Pecollari_119)
112. Esraa Ibrahim, letter dated August 9, 2025 (Ibrahim_120)
113. Esther Ibarra, letter dated August 9, 2025 (Ibarra_121)
114. Andrew Fuentes, letter dated August 8, 2025 (Fuentes_122)
115. Gerry Huang, letter dated August 9, 2025 (Huang_123)
116. Harold Cruz, letter dated August 8, 2025 (Cruz_124)
117. Jenny Lee, letter dated August 11, 2025 (Lee_127)
118. Jian Li, letter dated August 9, 2025 (Li_128)
119. Joane Motola, letter dated August 11, 2025 (Motola_129)
120. John Meloy, letter dated August 11, 2025 (Meloy_130)
121. JosephCosentino, letter dated August 8, 2025 (Cosentino_131)
122. Karen Duran Caro, letter dated August 8, 2025 (DuranCaro_132)
123. Luis Ingram, letters dated August 9, 2025 (Ingram_135, Ingram_136)
124. Paul Stomatolotos, letter dated August 11, 2025 (Stomatolotos_138)
125. Rita Guevara, letter dated August 6, 2025 (Guevara_139)
126. Rodrigo Duman, letter dated August 8, 2025 (Duman_140)
127. Rosaria Motola, letter dated August 11, 2025 (Motola_142)
128. Sarah Helden, letter dated August 6, 2025 (Helden_143)
129. Thomas Melloy, letter dated August 11, 2025 (Melloy_145)

QUEENSBRIDGE SCOPING MEETING FORM LETTER (84 SIGNATORIES, 8/12/25)

Yarianna Cepeda, Nancy Jara, Marisela Santos, Kalsang Yangtso, Samantha Padro, Amanda Moldovan, Shanay Mason, Maggie Hemphill, Cora Ortiz, Charlemayne Estep,

Cheri Churny, Flounoy Jackson, Isis Ferguson, Darrein Webster, Romelia Hidalgo, Melida Kennedy, Ty John, Sonya Ort, Dennis Munoz Marriaga, Judy Fears, Mary M, Shawn Jenkins, Constance Foster, Keyva Boone, Wynona Grady, Patrice Woods, Md Hossain, Jade Turner, Teresa Ilijic, Mary Coleman, Daniel Taylor, Hannah Giles, Edna Taylor Walden, Frank McCrea, Jesus Merchan, Marilyn Jones, Shirley Mitchell, Nafisa Mahdi, Maria Rojas, Nancy Molina, Anna Mercedes, Maria Leon, Robbin Davis, Rebecca White, Hood H, Helen Cushnie, Paul Amante, Rosalee Jones, Calvin Williams, Janie Edwards, Jacqueline Crine, Olivia Libia Jaramillo, Denise Bernard, William Moyet, Darlene Dickson, Patricia Cooper, Betty William, Ivone Treadwell, William Foster, Amy Chen, M Rojas, Ron Davis, Emilio Consantes, Chanele Wainright, Natasha Collins, Irene Treadwell, Fernanda Thompson, Shanay Mason, Crystal Sessoms-Wiggins, Dana D, Karah Edwards, Gwendolyn Wilson, Angela Glover, Lay Alston, Maggie Hemphill, Annie McCray, William Moyet, Ylma Cormdo, Eddie Ortiz, Yakima Levy, Pamela Wheeler, Marilyn Jones, Fernando Thompson, Terrina Johnson, Madison Froelich (QueensbridgeScoping_148)

C. COMMENTS AND RESPONSES

COMMUNITY ENGAGEMENT

Comment 1: Establish a community oversight committee (convened with participation from CB2, local stakeholders, city agencies, and development partners) to monitor implementation progress, surface issues, and advise on course corrections. Developers participating in the rezoning must cover legal and administrative costs associated with drafting and finalizing a community benefits agreement (CBA), to be signed prior to ULURP approval. (CB2_Queens_002)

Establish a community oversight committee to monitor implementation progress, [gain] community feedback, address issues, and make adjustments or corrections to the plan. This includes publishing goals, deliverables, timeliness and annual implementation progress report; support for union labor and fair employment practices; and publish and obtain feedback on Points of Agreement prior to finalization of ULURP and Council vote. (CB1_Queens_150)

Response 1: As part of the ULURP public review, the City will work with the public, local stakeholders and elected officials to address issues raised by the community.

Comment 2: Hold quarterly public meetings of the oversight committee to ensure transparency and allow for regular community input on milestones and challenges. (CB2_Queens_002)

Response 2: The City is actively engaged with the community around implementation of the Plan and various proposals for continued coordination post-adoption of the land use actions.

Comment 3: Publish annual implementation progress reports covering affordable housing delivery, school construction, open space completion, infrastructure improvements, and quality of life issues due to construction. (CB2_Queens_002)

Develop and publish an infrastructure sequencing plan that outlines which infrastructure upgrades (schools, sewers, parks, including new waterfront open space, and transit). City agencies (DOE, DEP, and DEP) must deliver before or alongside new development phases. This plan must include milestone dates and funding commitments to ensure timely delivery. [It] should not only support future growth but also correct for historic underinvestment stemming from prior rezonings in LIC. (CB2_Queens_002)

Establish a public reporting mechanism, such as annual ULURP progress updates, to track delivery of key infrastructure investments, with findings reported to CB2 and made publicly available. (CB2_Queens_002)

Capital investments directed to climate mitigation and infrastructure upgrades must be committed prior to approval of this rezoning. The City must provide a comprehensive plan for upgrading existing sewer infrastructure to meet the needs of current residents and buildings constructed under previous LIC rezonings, many of which continue to experience flooding and drainage issues due to outdated or insufficient capacity. (CB1_Queens_150)

Before construction begins for new development, there must be a plan in place with a timeline and identified plans to provide for anticipated needs of new development with respect to utilities, sanitary sewers and stormwater retention. The City must specify actions it will take to ensure that infrastructure will be able to handle the increased capacity and report transparently to the public. (CB1_Queens_150)

On a regular basis, relevant city agencies should evaluate, plan and ensure that services and infrastructure meet current and projected community needs. Infrastructure must be repaired or replaced on a timely schedule to accommodate projected population increases expected as a result of this rezoning. It is especially critical that infrastructure is updated since a significant

amount of the rezoning study is located within designated flood zones. (CB1_Queens_150)

Response 3: See response to Comment 1.

Comment 4: Ensure that community benefits from new development include reinvestment in public housing and local infrastructure. Explore opportunities to channel revenues or benefits from underutilized or inactive sites—such as those reactivated through new planning efforts—into a dedicated fund for capital needs at Queensbridge Houses and other public assets within the rezoning area. This approach reinforces equity and local reinvestment as core tenets of the OneLIC plan. (CB2_Queens_002)

The City must also prioritize significant upgrades and repairs in NYCHA developments to meet the needs of the residents so they can live with dignity. (CB1_Queens_150)

Response 4: As part of the Neighborhood Plan, the City has engaged residents at area NYCHA developments and is aware of, and is working towards addressing, the capital needs investment in repairs to these NYCHA buildings. However, NYCHA repairs and the funding needed to address conditions at the buildings are not under the purview of CPC and the zoning actions considered in the DEIS.

Comment 5: Formalize a post-ULUHP MOU that outlines agency responsibilities, funding timelines, and coordination protocols to guide post-approval accountability. (CB2_Queens_002)

Response 5: See response to Comment 1

Comment 6: Instead of green-lighting development over large areas of the neighborhood including public land: the city should be taking their time and leveraging their control of zoning to incentivize private developers to share their plans with the community in order to get community buy-in and give residents a chance to see what exactly is proposed for various sites before permitting developers to act. (Chan_BWB_034)

Response 6: Comment noted. The Proposed Actions are intended to create a framework for future development of the Long Island City neighborhood, permitting a variety of building forms that fit within the proposed zoning envelopes.

Comment 7: The Commission should be aware that the City Planning Department did not engage the Boards directly in the early stages of plan development and provided very limited time after the Boards' summer recess in 2024 to approve comments on the announced rezoning proposals and the DEIS scoping document. (Venech_041)

Response 7: DCP, in partnership with Councilmember Won, has held outreach and engagement around the OneLIC Neighborhood Plan since October 2023. All participants of the community, including the Boards, were invited to attend, for a comprehensive and transparent neighborhood planning process.

Comment 8: The Ravenswood Resident Association respectfully opposes the current plan as participants of numerous Town halls from the very beginning we are appalled at the fact that none of the many brilliant ideas discussed by community members are reflected within this plan. It's a false portrayal of community planning and it was not the comprehensive deep community defining that should have occurred [inaudible]… (Chaise_RRA_063)

There's been zero outreach to Ravenswood houses, even though we are only a few blocks away from the proposed rezoning. No one has come to our resident association meetings in the past 2 and a half years to inform us, or solicit any feedback on a large scale. (Chaise_RRA_063)

And strong public calls for sustainable, nonprofit development on the public parcels were not incorporated into the final plan. (Dubnau_WQCLT_126)

Response 8: Throughout the public engagement process for the OneLIC Neighborhood Plan, DCP made special efforts to engage with NYCHA residents, especially Queensbridge residents, who are located directly adjacent to the Project Area boundaries. DCP has worked directly with the Tenant Association and Councilmember Julie Won's office to design an outreach plan. This included distributing flyers to promote engagement events, as well as pamphlets describing the planning process and in early Winter 2024, DCP hosted three well-attended focus area meetings held at Jacob Riis Community Center at Queensbridge Houses. Discussions focused on climate resiliency, housing, and economic development. In Summer 2024, DCP and Councilmember Won hosted a well-attended Town Hall at Jacob Riis community Center at Queensbridge Houses. That same summer DCP met with the Queensbridge Tenants Association to walk through the

engagement process and to hear their concerns. DCP also participated in tabling events at Queensbridge Family Day to spread awareness about the Plan among residents, encourage participation and collect additional ideas and comments. The NYCHA campus at Ravenswood Houses is located roughly one block north of the context area determined for this study, and therefore is not captured in the environmental review or DCP's scope of public engagement. As described in Chapter 2 of the DEIS, "Land Use, Zoning, and Public Policy," the quarter mile perimeter denoting the Secondary Study Area is bounded to the north by 37th Avenue and doesn't include the Ravenswood Houses.

Comment 9:

The OneLIC plan doesn't reflect what community members have asked for over the last year and a half, and what we need and what we deserve. We need community-led, equitable development that puts people over profit. (Brown_WQFC_065)

Most of the residents didn't know this existed. I at least know a couple of 100 people… We keep getting forgotten. We don't exist… I would like to get more of the residents involved… We need to get the majority to decide. (Canuci_096)

I am against Project OneLIC because none of the meetings and discussions were made public so I can attend and my workers could attend plus our neighborhood has not been included in the rezoning proposal. (Motola_108)

Normally, when a project of this size has to let people know either by mail 3 times or send people door to door to bring to make everyone aware. (Cavaliere_109)

I have not received any notices about the project. (Motola_110)

[I] think that this project is man handled by the NYC bureaucracy and not by the community. No one has asked the community all has been done in community boards. (Harmath_111)

I am opposed to the new project since is to one-sided not considering the rest of Long Island City and it has been pushed through the system too fast without our knowledge (Josef_112)

I was not aware until I met a person that was at your last meeting and he informed us. (Eder_114)

I am surprised that I did not know about this Mega project. We need everybody to be aware. I heard this information from Valentin Canuci. Our community is uninformed at this time. (Ibrahim_120)

The project does not address all LIC, it stops short. The rezoning stops at 45th Street and it should cover all the streets up to [the] Pulaski Bridge. It address[es] commercial and Industrial areas. Please, to the commission, please give all the LIC to be part of rezoning. (Ibarra_121)

Please members of the commission put a hold on this project since this new to me. Need to reach all of the community not just the few. (Fuentes_122)

We need more time for the rest of the LIE to be rezoned. OneLIC has pushed the project under the radar. (Huang_123)

No meetings advertised or mailings. As I spoke with Mr. Canuci this project does not benefit our community and the project is not addressing the transportation issues. Please allow us in community to inform all the home owners and OneLIC to include us in the zoning study. (Cruz_124)

Most Queensbridge and Ravenswood residents have no idea that this plan is happening, and also don't seem to be in favor of it: 60 percent said they'd not heard of OneLIC. (Dubnau_WQCLT_126)

I am against the project because we were not included in the zoning and all seems to be very hush hush. Why have there not been any notices about this project. I had to hear from someone on the street. (Motola_129)

My mom came home and she heard from the neighbor about this project that the city is trying to pass in collusion without notices sent. Not including us in the rezoning plan. Are we chopped liver? (Meloy_130)

This proposal I was aware last year but it since fast tracked. The two people that kept me aware about happenings in the neighborhood have moved on. This project has been fast tracked through the system and a lot of people need to speak out and need to benefit not the rich land owners. (Cosentino_131)

Please give this community more time so all the community knows. (DuranCaro_132)

Project OneLIC needs more time so it can reach all people in LIC. (Ingram_136)

I heard about this project from my client Mr. Canuci. This zoning change and the neighborhood not being aware of it makes no sense. It seems that the project was kept law key. He seems to think that a few laws have been broken in pushing the project

through. He said that there was no effort on behalf of OneLIC to let the locals know. (Stomatolotos_138)

Mr Canuci told me yesterday about this ONELIC Project. This was unknown to us. I have had the place for 15 years. No one has known. Please let the members of our community make a decision in ample time. (Guevara_139)

I believe in changes, but the plan is not taking into consideration our community. (Ciobotea_JJ_149)

Response 9: As discussed in Chapter 1 of the DEIS, "Project Description," areas surrounding the Project Area have been rezoned between 2001 and 2008 to support a mix of uses throughout. The Project Area is the last portion of the neighborhood to see changes in zoning to meet the long-term vision of a thriving, prosperous, and resilient Long Island City. The engagement process for OneLIC included email blasts, flyering throughout the neighborhood, door knocking in targeted areas and support from Councilmember Julie Won's staff to spread awareness of upcoming public meetings. With respect to the Neighborhood Plan, DCP continues to strive for a robust engagement process that involves as many community members as reasonably possible. Engagement for the Neighborhood Plan began in November 2023 and has included 16 public meetings with over 1,800 attendees. Stakeholders are encouraged to continue to be part of the public review process through ULURP. See response to Comment 8 regarding engagement with NYCHA residents.

Comment 10: The impact of this rezoning wasn't adequately shared with community residents, because DCP refused to share their massing studies with the public. None of the concerns raised prior to the EIS-infrastructure and transit impacts, lack of open space, and displacement impacts on both residential and commercial communities have been addressed. (Dubnau_WQCLT_126)

Response 10: Assessments of the Proposed Actions' impacts on water and sewer infrastructure, transit, open space, and socioeconomic conditions are provided in the various DEIS chapters, for both the construction and operation of buildings created as a result of the Proposed Actions. As discussed in the Executive Summary of the DEIS, the potential for significant adverse impacts was considered in a comprehensive review of the Proposed Actions. Chapter 8, "Urban Design and Visual Resources," provides massing diagrams that illustrates the effect of the Proposed Actions. Chapter 11, "Water and Sewer Infrastructure," Chapter 14, "Transportation,"

Chapter 5, “Open Space,” and Chapter 3, “Socioeconomic Conditions,” analyze and disclose potential for significant adverse impacts in the referenced impact areas following the guidance of the *CEQR Technical Manual*. Where significant adverse impacts are identified, mitigation measures are identified.

PROJECT DESCRIPTION

Comment 11: Just 200 feet north of my property on 11th Street, across 43rd Avenue, the FAR is planned for 6.5. It is unclear to me why a dividing line exists when the connectivity and potential of 11th Street – the only street that directly links the Ed Koch Bridge in Queens to the Pulaski Bridge in Brooklyn – warrants a consistent, higher-density approach. (Wax_009)

Response 11: Chapter 1, “Project Description,” of the EIS describes the proposed zoning changes and the purpose and need that each action aims to achieve. The Proposed Actions would rezone this portion of the Project Area to a higher density manufacturing district as compared to what is permitted today. Acknowledging a higher concentration of industrial uses and a constrained street network, a lower M1-4A district is proposed for this property.

Comment 12: The City Planning Commission should also ask why the current administration is spending over three billion dollars of taxpayer monies to build flood resiliency on the Manhattan side of the city's coastline (at East River Park and Battery Park City) while greenlighting housing inside vulnerable floodplains on the Queens and Brooklyn side. (Goren_LICC-HPCC_134)

Response 12: Comment noted. As determined in Chapter 2, “Land Use, Zoning, and Public Policy,” of the EIS, the Proposed Actions were found to be consistent with the policies of the New York City Waterfront Revitalization Program, which considers the appropriateness of development within New York City’s Coastal Zone and the impacts of climate change, coastal flooding, and sea level rise.

ANALYTICAL FRAMEWORK

Comment 13: We strongly request that the City **undertake a coordinated Final EIS effort that addresses and evaluates the cumulative environmental impacts** of these rapid-fire rezonings—past, present, and in the foreseeable future. In the current OneLIC DEIS, an unacceptable omission is the foreseeable development of the

10.5-acre ConEd Learning Center adding up to a potential for millions more square feet of development on the East River waterfront. (LICC-HPCC_001)

Response 13: The various technical analysis chapters in the DEIS address cumulative impacts by comprehensively defining the environmental setting expected under the 2035 No Action condition, including a discussion of No Action developments, and the baseline growth in the No Action condition. While the criteria for determining significant adverse impacts vary for each technical area based on applicable CEQR guidance, they are generally based on the effects of the Proposed Actions added to the baseline No Action condition. As discussed in Chapter 27, "Conceptual Analyses," redevelopment of the Con Edison Learning Center site with a mix of uses would likely occur beyond the 2035 build year and would require future discretionary actions, including approvals to allow residential use, that are not considered as part of the Proposed Actions. Approval of future discretionary actions would require the preparation of an environmental review pursuant to the New York State Environmental Quality Review Act (SEQRA) and in accordance with the guidance in the *CEQR Technical Manual*.

Comment 14: The IBZ is already experiencing up to 8 degrees above the average temperatures for NYC—and temperatures are only rising. Over 300 people die in NYC annually from extreme heat. Adding more development to LIC will exacerbate the impact of extreme heat on public open spaces and the public realm. Walking ½ mile to a park during hot summer days is not only unpleasant but could have negative health impacts. The Vision Plan for Resiliency creates a network of public open spaces, continuous waterfront parks, and waterfront access along cooling corridors with temperatures lowered by deciduous trees, porous pavement, bike lanes, green roofs, and climate-resilient streetscaping. An assessment of the impacts of extreme heat in the IBZ must be provided in the Final EIS. (LICC-HPCC_001)

Commit to a funded street tree initiative in LIC, particularly in the IBZ and CB1 area to be rezoned, to address heat island effects, air quality, and climate mitigation. Budget should include not only planting but active long-term maintenance and replacement.

Response 14: The DEIS considers potential heat increases and the urban heat island effect of the Proposed Actions in the Project Area, which includes the IBZ, and resiliency measures to address heat increases in Chapter 16, "Greenhouse Gas Emissions and Climate Change." The expansion of open space under the Proposed

Actions, and the planting of new street trees in connection with new development, which is a developer requirement under zoning, could limit the impact of urban heat island effect. (CB1_Queens_150)

Comment 15: CEQR is supposed to guarantee these safeties, but the proposed plan finds ways to bypass CEQR. (Greenberg_040)

Response 15: As mandated by the State Environmental Quality Review Act, CEQR is the process by which New York City agencies determine what effect, if any, a discretionary action or actions may have upon the environment. CEQR is a disclosure process and not an approval process in and of itself. If the project under consideration has the potential for a significant adverse environmental impact, then the lead agency must consider alternatives which would avoid or minimize impacts to the maximum extent practicable.

Comment 16: The DEIS assumes minimal development in the "No Action" scenario, portraying current zoning as a barrier to growth. However, it omits a thorough analysis of existing zoning potential, such as Silvercup West, recent building and development trends, and development applications already in progress. This understates the baseline capacity for growth and inflates the benefits of the proposed actions. CEQR requires a robust No Action scenario as a foundation for comparing impacts. By downplaying this alternative, the DEIS creates a false narrative of necessity and fails to evaluate less-disruptive zoning changes that could still meet housing and job goals. (LICC-HPCC_001)

Response 16: The Silvercup West site located at Block 477, Lots 13, 15, 20 and 24 are not subject to zoning changes within the Proposed Actions and therefore not analyzed in the No Action condition. This site was analyzed in Chapter 27, "Conceptual Analysis," of the DEIS, as additional actions would need to occur to realize full development of the site under the existing zoning.

Comment 17: Our Community Board, our council member and our borough President have called for important conditions for approval.

The community as a whole wants present infrastructure deficiencies corrected, open space, resiliency for climate change, net 0 building and protection for businesses and residents in place before the change is upon us. I urge the Commission to not approve unless the conditions… are improved. (Greenberg_064)

Response 17: The Department of City Planning will continue to work alongside partner agencies such as DEP, Parks and MOCEJ to further analyze and address these infrastructure needs throughout the neighborhood plan's process.

Comment 18: We think that we are being gipped since our area was not included in in the environmental study and we have been neglected for 25 years. (Ciobotea_SC_113)

I lease the place but want to expand and by reasoning I can have more space. I am in the zone that was not included in the rezoning. Please rezone our neighborhood too. (Lee_127)

Now the rezoning again does not include our business or my house. (Li_128)

From my understanding this zoning project does not include our area. (Ingram_135)

This project will bring a lot of people in the area and 3/4 of the of the properties were not included in the project. (Duman_140)

Response 18: Comment noted. The Final Scope of Work for the DEIS established study areas based on the methodologies outlined in the *CEQR Technical Manual*.

ARTS AND CULTURE

Comment 19: Modify the zoning text to include a floor area exemption for nonprofit arts and cultural facilities, similar to the exemption granted for new public schools. (CB2_Queens_002)

Response 19: Under the City of Yes – Zoning for Economic Opportunity, arts and manufacturing uses have been consolidated into a single use group, enabling arts and cultural institutions to locate throughout the Project Area as-of-right. The proposal retains M-districts, meaning arts and cultural uses would continue to be permitted without requiring specialized zoning. As a result, specialized zoning to incentivize the development of Arts and Culture spaces (like those in 125th Street or Gowanus) is not proposed as an element of the Proposed Actions.

Comment 20: Encourage space partnerships between schools and local AC nonprofits in exchange for arts education, achieving both sustainable space for teaching artists and accessible arts education integration. (CB2_Queens_002)

Response 20: Comment noted. This action is outside the purview of the CPC.

Comment 21: Create a zoning incentive program that provides floor area ratio (FAR) bonuses to developers who provide street-level cultural space (minimum 2,000 usable square feet) under long-term, below-market leases to local AC organizations who can make highest and best use of designated spaces. (CB2_Queens_002)

Response 21: The proposed zoning text amendment prioritizes bonused floor area for provision of new publicly accessible open space. As part of the modified Waterfront Access Plan (WAP) requirements, developers opting for the floor area bonus for active recreation space (ZR §117-322) may select from a defined list of amenities (§117-361), including cultural and community-oriented spaces such as open-air amphitheaters, performance stages, and gathering lawns.

Comment 22: Designate a local umbrella nonprofit or collective of nonprofits to serve as matchmaker between developers and local AC nonprofits. (CB2_Queens_002)

Response 22: Comment noted. This action is outside of the purview of the CPC.

Comment 23: Engage city agencies—including, but not limited to, DOE, Department of Youth and Community Development (DYCD), Department of Cultural Affairs (DCLA), Mayor's Office of Media and Entertainment (MOME), NYC Economic Development Corporation (EDC), and Small Business Services (SBS) to coordinate capital and programmatic funding earmarked for new AC spaces. (CB2_Queens_002)

Response 23: Comment noted. The Department of City Planning will continue to work alongside partner agencies such as DOE, DYCD, DLCA, EDC, SBS, and others to coordinate capital and programmatic funding requests in connection to the LIC Neighborhood Plan

Comment 24: Create and designate at least one flexible, outdoor public space specifically suited for a variety of performances (e.g., an open amphitheater with access to power and minimum 200 seat capacity) in the rezoning area, potentially within a publicly accessible waterfront park. (CB2_Queens_002)

Create outdoor flex public performance space (200-person seating capacity) specifically suited for a variety of performances (i.e. open

amphitheater format with access to power), potentially within a waterfront park. (CB2_Queens_010)

Response 24: Comment noted. See response to Comment 21. The City is aware of the community's desire for public space, including public performance space, and will consider such an amenity in connection with redevelopment of city-owned sites. The creation and designation of outdoor public space specifically suited for a variety of performances is outside the purview of the Proposed Actions and environmental analyses under CEQR.

Comment 25: Launch a pilot short-term lease initiative that connects arts groups with vacant storefronts for temporary cultural activation, reducing commercial blight, activating ground floors along the street, and supporting local creatives. (CB2_Queens_002)

Response 25: Comment noted. Lease terms between private landlords and prospective tenants are beyond the purview of the CPC.

Comment 26: Support the creation of a cultural and community-oriented facility in the rezoning area to provide flexible, multipurpose space for local organizations and neighborhood programming. (CB2_Queens_002)

Response 26: Comment noted. See response to Comment 25.

Comment 27: Establish an Art Fund to be administered by a local IRS 501C3 arts organization existing with the new districts. This Arts Fund shall be funded by a $10/square foot surcharge on all residential non-affordable housing constructed in the zoning districts created as a result of the new OneLIC zoning. The fund shall be used to subsidize artists, not for profit art facilities and not for profit cultural organizations within the created zoning districts. (CB2_Queens_002)

Response 27: Comment noted. This action is beyond the purview of the CPC.

Comment 28: Incentivize developers to incorporate publicly accessible sites for arts and culture features such as murals and sculpture installations that honor and preserve the historic character of the neighborhood. (CB2_Queens_002)

Incentivize developers to provide at least 2,000 sq ft space for non-profit arts and culture use at long term, below-market leases (precedent: Gowanus Art Project). (CB2_Queens_010)

Incentivize developers to incorporate publicly accessible art sites such as murals and sculpture installations that honor and preserve the historic character of the neighborhood. (CB2_Queens_010)

I want to highlight two main CB2 recommendations for arts and culture: zoning incentives for developers to create below-market arts and culture spaces. (Batan_020)

I want to highlight two main CB2 recommendations for arts and culture: investment by developers into an LIC arts fund operated by a third party local nonprofit to streamline funding equitably, especially among small budget arts and culture orgs within the zoning area. Our sector has already been in talks with partners to establish this type of operation and eligibility requirements toward accessible, equitable funding, and we need city mechanisms to support this. Funding, both capital and expense funding, should not go to any single arts organization, but instead go through an arts fund equitably spread across arts orgs, and where small budget organizations in the zoning area should be prioritized. (Batan_020)

CB2's recommendations for arts and culture accomplish three things, one. Policies that incentivize developers to integrate arts and culture in their plans as a matter of community investment. A surcharge on market rate housing to subsidize arts and culture, and 3 commitments from city agencies to facilitate partnerships with arts, nonprofits. As a city value. (Narburgh_079)

We must mandatorily include arts and cultural space in this plan. Otherwise we are at risk of those organizations and artists getting priced out of the neighborhood. (Etzel_087)

The DEIS and the OneLIC plan failed to address a comprehensive plan for arts and culture, and reflects a lack of awareness of the unique synergistic landscape of how arts and culture operates in Long Island City. This is not sustainable nor adequate for the thriveability of arts and culture… There is a pressing need for affordable long term and appropriate workspaces to create and continue to serve our community… Arts and culture is an economic driver and identity of Long Island City, and must not only be preserved but expanded proportionately to the massive expansion proposed in the OneLIC plan. I want to highlight two main CB2 recommendations for arts and culture. One is zoning incentives for developers to create below market arts and culture spaces and two, investment by developers into Long Island City Arts Fund, operated by a third party, local nonprofit to streamline funding equitably, especially among the small budget arts and culture

organizations within the zoning area… If OneLIC is meant to be a comprehensive plan, then planning must include arts and culture (Batan_098)

We also hope that the final plan will include a strong commitment to art and culture by preserving and expanding space for creative uses. (Yu_LICP_099)

Response 28: See response to Comment 21. This is outside the purview of the Proposed Actions and environmental analyses under CEQR.

Comment 29: Plaza bonus on inland sites—is there anything for arts in that language? (CB2_Queens_010)

Response 29: The proposal applies the types and standards for amenities set forth in ZR Section 37-74, which permits the integration of artwork into public plaza spaces

Comment 30: Expand floor area exemption given for schools to also be given to spaces for nonprofit arts and culture use:

- Integrate arts and culture space use exemptions with school construction – simultaneously builds in direct arts education and artist work space (precedent) (CB2_Queens_010)

Response 30: Comment noted.

Comment 31: [Create a] short-term lease program for vacant storefront arts activations. (CB2_Queens_010)

Response 31: Comment noted. This is outside of the purview of the CPC.

Comment 32: Establish a neighborhood arts fund administered by a local nonprofit that developers and property owners put into annually as regrant funds for small budget LIC AC nonprofits under a determined set of eligibility requirements. (CB2_Queens_010)

Response 32: This action is beyond the purview of the CPC.

Comment 33: There are 112 arts organizations and independent artists working inside the proposed rezoning area. But if you don't build in structural incentives and requirements for free or low cost space, they will disappear after the buildings go up. It's going to be too late.

Culturelab alone brings over 60,000 people into the area each year, and contributes more than 2.5 million to the local economy.

And yet the current plan does not even mention arts and culture.

We're asking for four simple things, zoning initiatives that provide free or affordable long-term space for nonprofit organizations. A developer-funded LIC fund managed by a 3rd party nonprofit with full transparency 120 Broadway Hearing Room: investment in cultural infrastructure like permanent amphitheaters and local artist-led installations and partnerships with schools and city agencies to embed the arts into this into LIC's long-term plans. (Wheeler_CLLIC_068)

Response 33: See responses to Comments 25, 26, and 27.

Comment 34: The OneLIC Rezoning presents a rare opportunity for our community to receive much needed investment in several areas, including public space and arts and culture… With city investment we can not only expand our physical space, but also our arts, education and community engagement programming… We request that the City Planning Commission consider supporting city investments in cultural and public space projects such as ours as part of the OneLIC Rezoning. We also encourage you to support policy recommendations within the plan that enhance our community's rich ecosystem of artists and cultural organizations, such as zoning incentives for affordable cultural space. (Butler_MoMAPS1_071)

Response 34: Comment noted.

Comment 35: Our longtime partner, MoMA PS1 is seeking support through the OneLIC rezoning for its Courtyard and Plaza Access Renovation Project. Just as MoMA PS1 has been a cultural anchor of Long Island City for nearly 50 years generating significant economic development in the neighborhood and serving as a critical community hub and center of artistic expression, we believe this amazing institution can serve as the cultural anchor of the OneLIC rezoning itself. (Hau_NF_107, Bustamante_TAS_125, Rothrock_LICP_133, Day_TFS_141, Mohebbi_SC_144)

Response 35: Comment noted.

COMMUNITY SPACE

Comment 36: Refusing to provide schools because “there are no school sites” while inviting private developers to submit proposals on over two acres of public property owned by the NYC Department of

Education is a transparent fabrication and will harm future generations of children. (LICC-HPCC_001)

Commit to funding and constructing at least two new schools within the rezoning area, based on projected demand, in addition to the current School Construction Authority plan for three schools for the existing neighborhood population. This should include elementary, middle, and high school capacity. (CB2_Queens_002)

Commit to funding and constructing at least two new schools within the rezoning area, based on projected demand and/or other needs, in addition to the current SCA plan for three schools for the existing neighborhood population. It is imperative that schools be zoned to include students from Queensbridge Houses, given the history of segregation in District 30 in regards to school zoning boundaries. (CB1_Queens_150)

The City must be proactive in addressing future enrollment, as it is already delayed in addressing overcrowding and providing school seats given LIC's growth. Relying on developers to select an optional bonus to construct a school is not a proactive approach or comprehensive planning. Commit to funding and constructing at least two new schools within the rezoning area, based on projected demand and/or other needs, in addition to the current SCA plan for three schools for the existing neighborhood population. It is imperative that schools be zoned to include students from Queensbridge Houses, given the history of segregation in District 30 in regards to school zoning boundaries. (CB1_Queens_150)

Response 36: As discussed in Chapter 1, “Project Description,” the Proposed Actions incentivizes the development of schools by allowing for space occupied by school to be exempt from floor area calculations and create an authorization that would allow for additional flexibility in building envelope for development utilizing the new school floor area exemption rule. Regarding the Department of Education (DOE) Site, the City is exploring adaptive reuse of all or part of the property for a range of potential uses, such as light industrial, office, cultural, retail, and community-serving space. Additionally, between the publication of the DEIS and the FEIS, the SCA has determined that the community facility space included in Projected Development Site 1 would potentially be an appropriate location for a school and is actively discussing a potential school development with the property owner. In the event that a school is constructed on this site, it would serve to partially mitigate the elementary school impact resulting from the Proposed Actions.

Comment 37: Expand NYPD and FDNY services to match population growth from the rezoning, including additional personnel, equipment, and facilities where necessary, to maintain adequate emergency response times and public safety coverage. (CB2_Queens_002)

Response 37: Chapter 4, "Community Facilities," of the DEIS describes police and fire protection services. Pursuant to the guidance of the *CEQR Technical Manual*, significant adverse impacts were not identified with respect to police and fire protection services. The NYPD utilize a wide variety of data related to crime patterns, trends, traffic incidents, quality-of-life complaints, arrests, and officer deployment to routinely evaluate staffing at the precinct level. Similarly, the FDNY ensures adequate staffing levels at firehouses to maintain effective fire suppression and emergency response capabilities.

Comment 38: Initiate an emergency preparedness planning process in collaboration with NYC Emergency Management and local stakeholders. This process should identify a range of environmental vulnerabilities, notably both storm surge and intensive rainfall events, outline community mitigation strategies, and develop protocols for coordinated emergency response, especially in areas of greatest hazard. (CB2_Queens_002)

Response 38: Comment noted. This request is outside of the scope of the environmental review for the Proposed Actions and have not been analyzed in the EIS, pursuant to the guidance of the *CEQR Technical Manual*. However, DCP will continue to coordinate with its partner agencies to implement a holistic neighborhood plan

Comment 39: Identify a site for and commit to establishing a full-service hospital within or near the rezoning area, including comprehensive maternity and neonatal care. Long Island City's growing residential population requires local, accessible healthcare infrastructure to meet basic and emergency needs, especially for families. (CB2_Queens_002)

Response 39: Chapter 4, "Community Facilities," of the DEIS describes health care services. Pursuant to the guidance of the *CEQR Technical Manual*, significant adverse impacts were not identified with respect to health care services. The siting of a hospital is beyond the purview of the Proposed Actions. As discussed in Chapter 4, "Community Facilities," of the DEIS, the nearest hospital to the Project Area is Mount Sinai Queens, which is located approximately 1.25 miles from the Project Area at 25-10 30th

Avenue. Mount Sinai Queens has 235 beds and provides adult medical and surgical services with a team of nearly 500 physicians. In addition, there are approximately 43 outpatient health care facilities located within the 1-mile study area of the Project Area, as inventoried in DCP's Selected Facilities and Program Sites in New York City.

Comment 40: Mandate that all new school sites include on-site outdoor play space, rather than relying on already overtaxed public parks for gym and recreation, to support holistic educational environments. (CB2_Queens_002)

Response 40: Comment noted. The design, construction and operation of New York City public schools falls in the jurisdiction of the SCA and DOE, and is outside the purview of the Proposed Actions and environmental analyses under CEQR.

Comment 41: Longstanding residents like myself want green space and schools. But this plan does not promise that. In fact, zero school seats are within this plan, and there will be less green space and open space. (Chaise_RRA_063)

Response 41: Comment noted. Chapter 4, "Community Facilities," and Chapter 5, "Open Space," of the DEIS analyze open space and public school capacity. Pursuant to the guidance of the *CEQR Technical Manual*, significant adverse impacts were identified. Mitigation measures to alleviate these impacts are discussed in Chapter 21, "Mitigation."

Comment 42: Out of almost 3.6 million square feet of commercial space, less than 300,000 square feet are for community space. That equates to one building out of a whole 54 block rezoning. (Chaise_RRA_063)

Response 42: Comment noted. The Proposed Actions are comprehensive and formulated with community input. As described in Chapter 1, Project Description," of the EIS, the purpose and need of the Proposed Actions seek to substantially increase the amount of residential space in the Project Area, including needed affordable housing, commercial and light industrial space to support the growth of businesses, including in the creative and life science industries, open space, including a resilient waterfront with new parks, and community facilities.

HOUSING AND MIH

Comment 43: Proposing to place thousands of MIH units, housing the most vulnerable populations in NYC, at the lowest point of the floodplain with little access to transit and in the highest evacuation zones is incomprehensible at a time when the City needs deeply affordable homes that are safe. (LICC-HPCC_001)

Response 43: The Proposed Actions seeks to leverage Long Island City's Central Business District status, excellent transportation access, unique waterfront, and open space opportunities to expand affordable housing and position the area. Any building or structure within the current 1 percent annual chance floodplain would be designed and constructed in accordance with Appendix G of the Building Code, Flood-Resistant Construction. The proposed buildings at these sites will be required to have design flood elevations (DFEs) of at least +16 feet NAVD88 or +17 feet NAVD88. Residential units would need to be located at or above the DFE. Because the projected BFEs by the end of the century under the "High" scenario of sea level rise would be at +17 feet NAVD88 and +18 feet NAVD88, some of the DFEs could be below the BFE in the future. However, zoning flexibility provided by the Zoning for Coastal Flood Resilience encourages the placement of certain vulnerable features such as mechanical equipment well above future flood depths. Furthermore, buildings subject to the Department of Housing Preservation and Development's design review process (including those that are not within the current floodplain but fall within the projected 1 percent annual chance floodplain in the 2080s) are required to meet even higher resiliency standards, including an adjusted design flood elevation of 52", among other measures.

Comment 44: Apply MIH Options 1 and 3, which require 20 percent to 25 percent of residential floor area to be permanently affordable, targeted at 40 percent to 60 percent of AMI. These options are essential to address the acute housing needs of low-income families and individuals, many of whom are currently cost-burdened or at risk of displacement from LIC. The community has seen a significant influx of high-income households in recent years, while housing affordable to longtime residents—especially those earning below 60 percent AMI—has become increasingly scarce. Options 1 and 3 ensure deeper affordability levels that are aligned with the economic realities of residents, including NYCHA households, essential workers, and seniors. Requiring these MIH options

throughout the rezoning area would help counteract market pressures, promote economic diversity, and better reflect the needs and priorities of the existing mixed-income community. While we acknowledge that AMI is set federally, we urge the City and State to explore mechanisms that align local housing affordability requirements more closely with neighborhood-level incomes and cost burdens. (CB2_Queens_002)

MIH mapped within the OneLIC study area must be either Option 1 (25%) or Option 3 (20%}. (CB1_Queens_150)

Response 44: Comment noted. The Proposed Actions would map Options 1, 2, and 3; however, the MIH option(s) for the Proposed Actions is/are to be finalized at the City Council review period of ULURP.

Comment 45: Commit to developing a combination of 100 percent affordable housing, public parks with both active and passive recreation, and a new school across the City-owned development sites. Developers should adequately protect affordable housing from extreme flooding through stringent resilient methods and/or should consider other sites for vulnerable populations. This ensures that public land delivers maximum public benefit and can serve as a model for equitable development. Developers who do not provide meaningful community benefits-such as deeply affordable housing or public open space-should be subject—to reduced maximum building heights to ensure all new development supports neighborhood priorities. (CB2_Queens_002)

Any housing built on publicly owned land should be 100% affordable and remain so in perpetuity, under community or city control. (CB1_Queens_150)

Response 45: See response to Comment 36 regarding the provisions of schools. With the proposed zoning, residential uses would be allowed throughout portions of the Project Area, expanding the City's housing supply to help meet the housing needs of current and future residents, and significantly increasing the supply of affordable housing through the application of MIH. New housing would be permitted along Anable Basin and the East River, along 44th Drive and Vernon Boulevard, and near downtown Long Island City. The Proposed Actions are expected to result in a net increase of approximately 14,699 dwelling units, including approximately 3,245 to 4,867 permanently affordable homes for lower-income New Yorkers), with 20 to 30 percent of the units expected to be affordable in accordance with MIH. Deeper affordability may be provided on City-owned sites and/or developments that utilize city

subsidy. The WAP would require new waterfront open space in connection with waterfront development. The Proposed Actions would modify the existing WAP to guide the development of new, high-quality open space (up to 6 acres) that will connect the waterfront with the surrounding community. The WAP would also incentivize uses and programs to ensure a variety of uses, both active and passive. Moreover, the modified WAP would also require more robust elevation requirements to create a more resilient waterfront, ensuring the waterfront is accessible in the long term. To create opportunities for publicly accessible open space near the core, the LIC Special District would include a CPC authorization to allow developments within M1-6/R9, M1-6/R10 and M1-6A/R10 districts to access the floor area bonus for on-site public plazas that is available in other areas of the City.

Comment 46: Encourage the development of projects that significantly exceed minimum affordable housing requirements. particularly those offering majority or fully income-restricted housing, through strengthened zoning and financial incentives. Tools such as expanded density bonuses or transfer of development rights should be considered in partnership with developers and nonprofits committed to long-term affordability. These strategies can help deliver deeper affordability levels that reflect community needs and support mixed-income stability. (CB2_Queens_002)

Commit to using subsidy programs (ELLA and Mix Match) to ensure the deepest affordability to support lower income residents, senior housing, supportive housing, formerly homeless, people with disabilities, and residents of Queensbridge Houses who average approximately $25,000 annually, bringing the total percentage of affordable units to a minimum of 80% within the blocks in CB1. We encourage additional subsidies for affordable housing for the residential areas in CB2 as well. (CB1_Queens_150)

Response 46: The Proposed Actions build upon recent zoning changes approved as part of City of Yes, which increases allowable residential densities and modifies bulk controls to facilitate affordable housing. The Proposed Actions are expected to result in a net increase of approximately 14,699 dwelling units, including approximately 3,245 to 4,867 permanently affordable homes. The Proposed Actions would bring broader affordability requirements to the neighborhood through the mapping of Mandatory Inclusionary Housing (MIH) areas. MIH is proposed to be mapped over large parts of the Project Area and would require a portion of

all new housing developed to be income restricted. The MIH option(s) for the Proposed Actions is/are to be finalized as part of the ULURP review. The number of affordable units shown in the EIS is approximate and based on a percentage of floor area under the RWCDS and could range from 20 percent affordable under MIH Option 3 to up to 30 percent under MIH Option 2. Tools and strategies to exceed those MIH mandated percentages are outside the purview of the Proposed Actions and environmental analyses under CEQR. Further, the Proposed Actions would not preclude the utilization of city and state subsidy and HUD funding for construction to ensure the provision of deeper affordability and supportive and senior housing development.

Comment 47: To the greatest extent possible, prioritize family-sized units (2- and 3-bedroom apartments) to support the diverse household needs of LIC's working families. (CB2_Queens_002)

Response 47: Comment noted. Zoning does not dictate the number of bedrooms within a dwelling unit.

Comment 48: Enhance access to affordable units by supporting application assistance programs, expanding local outreach, and creating clear pipelines for NYCHA and voucher-eligible residents. (CB2_Queens_002)

Response 48: Comment noted. HPD, NYCHA, and HCR administer rental subsidy programs. The NYCHA Section 8 program is currently closed. This is outside the purview of the Proposed Actions and environmental analyses under CEQR

Comment 49: Require the Department of City Planning (DCP) and Housing Preservation and Development (HPD) to publish an updated five-year review of MIH housing production in the city's existing NYC Open Data system, including unit counts, AMI levels, and unit sizes. This will help assess the program's effectiveness in Long Island City and citywide, and guide deeper affordability strategies within OneLIC. (CB2_Queens_002)

Response 49: The creation of Mandatory Inclusionary Housing (MIH) units is tracked by HPD and DCP. MIH projects are publicly available on NYC Open Data under “Mandatory Inclusionary Housing.” Reports such as the 2025 NYC Housing Tracker Report also track affordable housing production, including MIH units.

Comment 50: Encourage the sale of new market-rate units to first-time homeowners, particularly those using State and City first-time homebuyer programs, to help build intergenerational wealth, promote economic stability, and offer alternatives to long-term renting. (CB2_Queens_002)

Response 50: Comment noted. This action is not the subject of this environmental review. However, as part of the neighborhood planning process, DCP is working with the Department of Housing Preservation and Development (HPD) and partner agencies to support and promote a wide range of housing options. HPD has existing programs to help support existing and new homeowners and to encourage homeownership.

Comment 51: New residential buildings should be affordable for all levels of income, not just limited to lower income or high rent for the rich. More than 3000/month for a studio is ridiculous. (Fowler_006)

Response 51: Comment noted. The Proposed Actions are intended to increase supply of housing for a range of household incomes.

Comment 52: I also think we need more affordable housing in this neighborhood to support families who want to stay and move into the LIC area. (Zhu_012)

Response 52: Comment noted. The Proposed Actions are expected to result in a net increase of approximately 14,699 dwelling units, including approximately 3,245 to 4,867 permanently affordable homes.

Comment 53: We are encouraged by the possibility that the proposed zoning changes will lead to the construction of affordable housing, including student housing. (Adams_LCC_021)

Response 53: Comment noted. Student housing (Use Group IIIA) is permitted where mixed use districts pairing a residential district with a manufacturing district are proposed.

Comment 54: The rising cost of living in Long Island City has made it increasingly difficult for working families, seniors, and young professionals to find secure housing. I urge the Commission to prioritize housing policies and zoning changes that increase affordable units—especially deeply affordable options—through new developments, adaptive reuse, and incentives for long-term affordability. (Pan_036)

Response 54: Comment noted. The Proposed Actions would map Mandatory Inclusionary Housing in large portions of the Project Area. This would require new developments or enlargements to set aside 20-30 percent of units as income restricted housing and would result in approximately 3,245 to 4,867 permanently affordable homes for lower-income New Yorkers.

Comment 55: Investing in Queensbridge Houses: The City Council has already committed millions of dollars to grounds improvements and elevator upgrades at Queensbridge Houses, none of which have been completed to date. We have also been in discussion with NYCHA and Queensbridge residents to understand which additional projects are of highest priority and are waiting on estimates from NYCHA on how much these various projects will cost. In order to support this rezoning, we need a written commitment from NYCHA to complete the already-funded projects by an agreed-upon timeline and additional capital investments to address priority projects at Queensbridge Houses ahead of the Council vote. (Won_NYCC_051)

Response 55: See response to Comment 4.

Comment 56: The WQCLT is not against development—we are for equitable development. What we need is deep affordability, truly community-led planning, and protections for permanent deep affordable housing… 320 income restricted units is not enough, if the city is going beyond MIH—then they need to consider increasing these numbers, we have over 100,000 homeless individuals in shelters and this includes children. (Herrera_WQCLT_054)

320 income restricted units is not enough. If the city is going beyond MIH, then they need to consider increasing these numbers. (Herrera_WQCLT_073)

Response 56: Comment noted.

Comment 57: [This project is] an outrageous symbol of disdain for those of lower economic means. There has been a lot of talk about the levels of affordable housing this up zone will bring, including talk of 100 percent in the publicly owned areas. However, there is no guarantee in the draft EIS, which I can only believe has not been closely examined. (Brooks_LICC_WQCLT_059)

Response 57: Comment noted. See response to Comment 54

Comment 58: Queensbridge residents do not want 70-plus story luxury buildings across the street from them, especially as a six-story development. It will violate our rights to air and light the very foundation to public housing design, we made clear time and time again in these public meetings we do not want or need any more high rise market rate rentals with sprinkles of unaffordable income restricted units that the majority of New Yorkers, especially NYCHA residents, cannot access. (Chaise_RRA_063)

LIC doesn't need another forest of luxury glass towers. This was mentioned over and over at the OneLIC Visioning sessions people kept asking for deeply affordable housing, not more unaffordable towers. This imperative is not reflected in the plan. (Dubnau_WQCLT_072)

Response 58: Comment noted. Chapter 8, "Urban Design and Visual Resources," provides an assessment of the effects of the Proposed Actions on the public realm, pursuant to the guidance of the *CEQR Technical Manual*.

Comment 59: If people's well-being is our number one goal, the city would be upgrading all of those services and infrastructure and building housing for low income residents. Provide services and low income housing. I don't believe the lies that the OneLIC plan will provide affordable housing. MIH is a drop in the bucket full of extremely expensive housing, created because developers are putting profit over people. (Brown_WQFC_065)

Response 59: Comment noted.

Comment 60: OneLIC's stated goal, to "serve diverse types of households and family needs," is not met by the proposed plan. (Hunter_076)

Response 60: Comment noted. According to the Racial Equity Report included with the related land use application, the Proposed Actions would provide market rate housing along with income-restricted housing through mapping MIH to portions of the Project Area. A variety of income levels would be served ranging from 40 percent to 120 percent of the Area Median Income.

Comment 61: I want to see the public sites maximize the number of affordable homes, and especially deeply affordable homes… If cross subsidizing affordable homes with some market rate housing allows us to get more affordability, I would strongly encourage that to be explored. (Reddy_084)

Response 61: Comment noted.

Comment 62: Specifically, the affordable housing is fantastic. Don't get me wrong, but, like everyone else, I'm a strong supporter of that. And I just think that it's also important to emphasize the need for market rate. (Miller_094)

Response 62: Comment noted. As indicated in the DEIS, both affordable and market rate housing would be facilitated by the Proposed Actions within the Project Area.

Comment 63: The fundamental challenge here is building as much housing as possible. Failure to do so is failure to seriously tackle the housing crisis as a whole. Please keep on pushing forward with the rezoning to create new homes for all of us (Natanawan_105)

Response 63: Comment noted.

Comment 64: Over 80 percent of respondents said that rent between $500-$1,000 for a 1-bedroom would be considered affordable. There will be practically no units at these rent levels in this plan. (Dubnau_WQCLT_126)

Response 64: Comment noted.

INDUSTRIAL BUSINESS ZONE

Comment 65: The Vision Plan enhances the IBZ's existing ecosystem of productive businesses with new live/workspaces and manufacturing that is innovative, cleaner, greener and quieter creating a true mixed-use community. (LICC-HPCC_001)

Response 65: Comment noted.

Comment 66: NYC Parks and the City Council must commit to a funded street tree initiative in LIC, particularly in the Industrial Business Zone (IBZ), to address heat island effects. Budget should include not only planting but active long-term maintenance and replacement. (CB2_Queens_002)

Response 66: Comment noted. Street tree planting in the IBZ falls under the jurisdiction of NYC Parks and the LIC Industrial Business Service Provider.

Comment 67: Changes to how traffic is diverted along 21st Street no longer make the lots in the IBZ North, feasible for significant manufacturing or industrial transport. This discourages any manufacturing or wholesale company from outside of the city who might have been interested in a move to the area. (Hsia_074)

Response 67: Comment noted.

Comment 68: This designation no longer makes sense for this neighborhood, the City council should be pushed towards modifying this IBZ designation in order to match the already changed character of Long Island City. (Hsia_074)

Response 68: The study area contains portions of the Long Island City Industrial Business Zone (IBZ) and the Proposed Actions would rezone lots within the IBZ to increase the maximum permitted manufacturing and commercial FAR.

Comment 69: We encourage the City to explore the creation of an incentive program to support property owners and developers who retain local businesses and preserve industrial and manufacturing space. Such a program could help stabilize the industrial footprint of the neighborhood by encouraging long-term leases, reinvestment in outdated facilities, and upgrades to accommodate modern operational needs. Given the unique requirements of industrial businesses, which include heavy equipment, freight access, and specialized utilities, any support program should be appropriately scaled to reflect the high cost of facility improvements and investments. (Yu_LICP_115)

Response 69: Comment noted. This request is outside of the purview of the Proposed Actions. DCP will continue to work with partner agencies to support the diversity and vitality of Long Island City's unique and thriving economy as outlined in the Neighborhood Plan.

OPEN SPACE AND THE WATERFRONT

Comment 70: A new marine facility for transporting supplies and products, including e-commerce, will connect the IBZ with other innovative zones along the River and Upper Bay, reduce pollution from trucks, and ease the tangle of traffic around the Queensboro Bridge. (LICC-HPCC_001)

Response 70: Comment noted. A marine facility to transport supplies and products is not part of the Proposed Actions.

Comment 71: The Final EIS must be proactive about climate change risks as illustrated in the community's Hunters Point North—Vision Plan for Resiliency. A resilient waterfront park is what this Community Board and community coalition have historically requested. The ½ mile of existing waterfront parks along the East River from Gantry Plaza to Newtown Creek show the potential for multiple active and passive park experiences, from public concerts to quiet coves, along this valuable northern waterfront. (LICC-HPCC_001)

Response 71: As described in Chapter 1, "Project Description," and Chapter 5, "Open Space," the Proposed Actions would result in at least 4.38 acres of waterfront open space and up to 6 acres of open space (including potential voluntary open space). In addition, the WAP would establish stricter coastal resiliency measures along the waterfront to help protect the study area from coastal flooding events. The Proposed Actions would result in a new resilient waterfront by raising the grade of the waterfront in connection with the construction of mixed-use developments. The modified WAP would create a continuous raised shoreline that would include a mix of hard infrastructure as well as natural features such as native coastal plantings to provide flood protection and erosion control.

Comment 72: Strengthen and formalize requirements within the Waterfront Access Plan (WAP) to ensure that all designated waterfront areas provide genuinely usable, inclusive, and climate-resilient public spaces. CB2 recommends that the WAP zoning text should be amended to require wider minimum waterfront open space, exceeding the 40' baseline. It should also ensure continuous connectivity, seating, shade, and recreational amenities; clear guidelines for maintenance responsibilities; and integration with upland access points to maximize community benefit and equitable access. (CB2_Queens_002)

Response 72: The Proposed Actions would require that all parcels within the Waterfront Access Plan develop publicly accessible open spaces that include a minimum 40' walkway, seating, planting and other mixes of uses that create a physical connection between the waterfront and upland community. WAP parcels are required to be contiguous to ensure public access along the waterfront is maintained. In addition to the WAP requirements, the Proposed Actions also includes an active recreation bonus that provides developments with a floor area increases when active recreational amenities are provided within waterfront open spaces.

Comment 73: Expand the footprint of parkland beyond the waterfront by identifying and acquiring upland sites suitable for passive and active recreation, particularly in underserved areas like Court Square and Queens Plaza. LIC falls far short of the City's open space goal of 2.5 acres per 1,000 residents, currently providing only about 1.35 acres per 1,000. As one of the most park-deficient districts in New York City, this shortfall makes it critical that any new development be paired with major investments in public open space to support health, equity, and livability. (CB2_Queens_002)

Response 73: Chapter 5, "Open Space," of the DEIS assesses the potential for the Proposed Actions to result in significant adverse impacts related to open space pursuant to the guidance of the *CEQR Technical Manual*. Where impacts are identified, mitigation measures are identified in Chapter 21, "Mitigation." To create opportunities for passive publicly accessible open space in Inland areas, the LIC Special District would create a new CPC Authorization to allow development in M1-6/R9, M1-6/R10, and M1-6A/R10 districts to access the existing floor area bonus for public plazas in the New York City Zoning Resolution. The proposed authorization is assessed in Chapter 27, "Conceptual Analyses" and could yield up to 29,997 square feet of passive publicly accessible open space.

Comment 74: Establish zoning requirements or design guidelines to ensure that new privately-owned and managed public spaces are truly usable, habitable, and welcoming, with minimum standards for size, seating, shade, and accessibility. (CB2_Queens_002)

Response 74: Comment noted. The modified Waterfront Access Plan (WAP) would specify the location of required shore public walkways, supplemental public access areas, upland connections, and visual corridors that ensure access to the Anable Basin from surrounding neighborhoods and to address the configuration of and varied conditions along the Basin. The WAP would also modify requirements and standards for public access to address the unique character of the Basin and align with modern citywide standards. Through the modified WAP, the Proposed Actions would support the creation of new waterfront open spaces along the East River and Anable Basin that would create an active and vibrant shoreline. Along with the WAP and proposed street and park mappings, the Proposed Actions would reknit the community to the shoreline, which today is characterized by public and private properties with no waterfront access. The Proposed Actions would provide access to the water with several points of access along the

shoreline. Publicly accessible open spaces created through a CPC authorization as part of the Proposed Actions would need to follow minimum standards as outlined in the Zoning Resolution.

Comment 75: Convert specific underutilized parcels (such as parking lots or city-owned properties adjacent to NYCHA developments} into new public parks, using tools like land swaps or the "Walk to a Park" site selection framework. (CB2_Queens_002)

Response 75: The Proposed Actions would include the acquisition and site selection of portions of a property located at Block 488, Lot 114, for the creation of publicly accessible open space along the East River waterfront. This action could create new open spaces while also working towards the goal of a connected waterfront from Queensbridge Park to Gantry Plaza State Park.

Comment 76: For decades, NYC DOT and Parks have occupied the space under the Queensboro Bridge ramps. Much of this space was once Queensbridge Baby Park, a 3-acre park space for Queensbridge Houses residents. Our vision is to return this land to public use. Over the years, NYC DOT and Parks fenced off these lots for storage and operations, effectively segregating Queensbridge Houses from the rest of Long Island City. Ahead of the City Council vote, we need written agreements from NYC DOT and Parks to relocate these activities to other nearby publicly-owned land and capital commitments from the City to invest in the construction of a restored Queensbridge Baby Park. (Won_NYCC_051)

Transform city-owned land beneath the Queensboro Bridge into permanent public park space. These parcels represent some of the most underutilized land in the rezoning area and are well-positioned to serve adjacent high-density neighborhoods. This land should be repurposed to create accessible, climate-resilient, and actively programmed open space that addresses longstanding open space inequities and connects to broader green infrastructure and pedestrian networks. (CB2_Queens_002)

DOT fenced parking areas under 59th Street Bridge and 43rd Avenue at Vernon Boulevard need to be turned over to the City for additional parks and recreation areas for local residents. (Fowler_005)

Return public lands underneath the Queensboro Bridge which are occupied by DOT to the public by creating sport parks and dog parks. (Fowler_006)

City must commit to purchasing new land or converting existing public land to public green space or public open space, such as the DOT and currently leased public properties under the Queensborough Bridge. The City must also commit to acquiring new land for public open space within CB2, as recommended by the board. (CB1_Queens_150)

Response 76: Comment noted. See response to Comment 73. DCP is continuing to collaborate with DOT and Parks to explore the potential to expand open space under the Queensboro Bridge.

Comment 77: Creating a connected waterfront. While we are in discussions with NYPA, ConEd, and other private landowners on the waterfront about the creation of a publicly accessible waterfront esplanade as part of the rezoning, we still lack written agreements and capital commitments from the City and State to ensure that this waterfront esplanade becomes a reality. We need concrete agreements from all partners on the creation of the esplanade, capital investment commitments, and an implementation timeline ahead of the Council vote. (Won_NYCC_051)

Prioritize the waterfront connection for Queensbridge Houses and completion of the seawall project. (CB1_Queens_150)

Response 77: Comment noted. See responses to Comments 73 and 75. A connected, resilient and accessible waterfront from Gantry Plaza State Park to Queensbridge Park is one of the five goals of the OneLIC Neighborhood Plan. such as the repair and reconstruction of the seawall in Queensbridge Park for storm protection.

Comment noted with respect to the seawall. As discussed in Chapter 1, “Project Description,” the Proposed Actions prioritizes the East River waterfront and connection between the waterfront and inland areas and connection between Gantry Plaza State Park and Queensbridge Park.

Comment 78: The OneLIC proposal and the DEIS failed to provide more open space and instead will create more of the negative impacts of scale as noted in Brooklyn. In fact, hidden in the DEIS with the one LIC proposal is a significant loss of open space as well as excessive shadows, increased urban heat island effects. Among other anti-human scale consequences, for example, the DEIS claims the project adds 4.38 acres on the waterfront, but buries the fact that open space will actually drop by nearly 20 percent, and active open

space will drop to 0.2 acres per 1,000 residents far below the city's own guidelines of 2 acres per 1,000. (Limbert_062)

Response 78: The EIS includes a detailed analysis of the Proposed Actions' effects on open space in accordance with *CEQR Technical Manual* methodology. As presented in Chapter 5, "Open Space," the Proposed Actions are expected to result in significant adverse indirect impacts on open space in the residential study area. As described in Chapter 21, "Mitigation," although potential mitigation measures would increase open space acreage, opportunities to create new publicly-accessible open space that fully mitigates the identified significant adverse open space impact (approximately 16.33 acres) are very limited. As a result, this significant adverse open space impact is not expected to be completely eliminated and, as a result, the DEIS disclosed an unavoidable significant adverse open space impact as a result of the Proposed Actions.

Comment 79: Local law 1065 mandates that the city increase its tree canopy to 30 percent. Yet court square is currently at 5 percent, and the DEIS completely ignored the city law, pretending it does not exist. Instead, even currently, despite the mandatory rules to plant trees and have wider sidewalks with new development, a number of recent towers along Jackson Avenue just fail to do so. (Limbert_062)

Response 79: Comment noted. Compliance with the referenced law is beyond the purview of this environmental review. See response to Comment 79. Developments filed with the DOB after May 3, 2010 are required to plant a new tree for every 25 feet of building street frontage as outlined in the Zoning Resolution.

Comment 80: [Vote no on the rezoning, unless there is] a resilient waterfront public park connecting Queensbridge Houses with Anable Basin. (Herrera_WQCLT_073)

Response 80: The Proposed Actions would modify the Northern Hunters Point Waterfront Access Plan in order to encourage the development of a publicly accessible waterfront connecting Queensbridge Park with Gantry Plaza State Park.

Comment 81: I'm very concerned about the lack of new, usable public open space in the proposed plan. The OneLIC DEIS identifies this deficit and acknowledges that population growth triggered by the rezoning would result in a community with the lowest open space ratio in the city, however, no meaningful new park space beyond a

public walkway along the waterfront is guaranteed by the plan. There will be little opportunity for active and passive recreation close by, or the public spaces that promote neighborhood interaction and community. (Hunter_076)

In a neighborhood that…is the third lowest in the city of open space, this plan makes LIC the absolute lowest (Limbery_062)

Response 81: See response to Comment 72. The Proposed Actions establishes a variety of tools to create new open spaces in Long Island City. The modified WAP would create up to 6 acres of connected, publicly accessible open space. The WAP also includes a floor area bonus for waterfront sites that include active recreation programming. Additionally, the Proposed Actions include a CPC Authorization for a floor area bonus to certain sites when a publicly accessible open space is provided.

Comment 82: I also want to recommend that the protections for the green space be strengthened, and I particularly welcome continuing the green space along the Queens waterfront from Queensbridge Houses down to Gantry Plaza State Park, to create one new, unified green area. (Etzel_087)

I would like to see a lot more green space. As people have mentioned previously. We are 57th out of 59th in our district, in terms of green space and parkland per capita. Not good. And this part in this plan yes, it may even make that worse. But we need to develop some of this green space. We need the area underneath the 59th Street Bridge, which currently is a parking lot for.to be turned into an active green space area. (Basch_082)

Response 82: Comment noted. See response to Comment 77.

Comment 83: If we were able to open up the waterfront from Anable Basin, going all the way up to Queensbridge Park. It would be an incredible public amenity and very beneficial to the community, so I'm very much in support of this plan. (Quigley_100)

Response 83: Comment noted.

Comment 84: To critique the EIS specifically, it is outrageous that there was no consideration of the work done in the Vision Plan For Sustainability For Hunters Point North. Where are the lessons learned from Superstorm Sandy. Just because the Trump administration has declared that climate change is a hoax does not mean that all the insights of the last decade about building on the waterfront should

be thrown out the window. What does it mean when it's suggested the area by the East River will be built up by 15 feet? That where I live will become a bathtub filled with a mix of storm water and sewage? If a park is to be built along the river from Anable Basin to Queensbridge Park, let it be substantial, not a narrow path. (Brooks_LICC_WQCLT_118)

Response 84: See response to Comments 71 and 72.

Comment 85: Fund and prioritize acquisition of privately held land in CD1 along the waterfront north of Queensbridge Houses in order to widen and extend the waterfront walkway and bike path planned in CD2Q as part of OneLIC. (CB1_Queens_150)

Response 85: Comment noted. This request is not included as part of the Proposed Actions and, as a result, is beyond the purview of CEQR and the environmental review.

PUBLIC LAND/SITES

Comment 86: The Vision Plan strongly supports keeping ALL valuable public assets in public hands for public uses. New public community facilities are essential to address LIC's record residential growth from recent rezonings, which has far outstripped essential services, infrastructure, schools, streets, transit, and open spaces. To deliver equitable community benefits, the top ten community facilities and services proposed in Hunters Point North include continuous public parks and open spaces along the waterfront, state-of-the-art educational buildings, redevelopment of the existing DOE Building for multiple community uses, and critically needed community services. (LICC-HPCC_001)

Response 86: Comment noted. The Proposed Actions seek to leverage city-owned properties for a range of public serving uses, including community uses, open space and housing. New York City's vacancy rate is at an all-time low, and housing for a range of households, including needed affordable housing, is critical. The Proposed Actions would introduce broader affordability requirements to Long Island City through the mapping of MIH and redevelopment of City-owned properties.

Comment 87: Identify and commit to a site for a publicly owned, fully accessible neighborhood park of at least 2 acres within the Court Square area. This neighborhood is already among the most densely populated in the rezoning area and acutely lacks usable open space to serve

a multi-generational population of local residents. (CB2_Queens_002)

Response 87: Court Square is a very dense, built up neighborhood, which makes it challenging to acquire and construct a 2-acre park. To create opportunities for publicly accessible open space near the core, the LIC Special District would include a CPC authorization to allow developments within M1-6/R9, M1-6/R10 and M1-6A/R10 districts to access the floor area bonus for on-site public plazas that is available in other areas of the City.

Comment 88: Create a full-sized public outdoor community pool within the rezoning area. LIC currently lacks access to adequate public outdoor swimming facilities. The only option within CB2 is a small 40' x 20' pool at Windmuller Park, which does not meet the needs of the growing population. (CB2_Queens_002)

Response 88: Comment noted. See response to Comment 78. Provision of public outdoor swimming facilities is beyond the purview of the environmental review

Comment 89: Utilize city-owned land along 44th Drive to deliver an integrated set of public benefits, guided by community-generated concepts such as the one illustrated in the sketch below. This concept proposes: a 2+ acre public park for active recreation; a renovated Board of Education building to accommodate a new high school and 75,000 square feet of community arts space; 100 percent affordable senior and supportive housing as currently proposed (~320 units); and passive open space with trees and seating along the Anable Basin waterfront. This conceptual vision demonstrates how a cohesive, site-specific plan can address multiple community priorities—housing, education, open space, and arts—in one of the neighborhood's most strategic public locations at the main entry point to the new public waterfront. The City should work with the community to refine and realize a mixed-use vision that maximizes public value and embodies Long Island City's unique character. Public land must be retained in public ownership and leased—not sold—to ensure long-term accountability and community benefit. (CB2_Queens_002)

Utilize city-owned land along 44th Drive to deliver an integrated set of public benefits, guided by community-generated concepts, and maximize the use of public land for public good. The City should work with the community to refine and realize a comparable mixed-

use vision that maximizes public value and equity, including community land trusts. (CB1_Queens_150)

Response 89: .Under the Proposed Actions, 44-59 45th Avenue would be utilized for housing and community facility space. No programming has been determined at this time for 44-36 Vernon Boulevard and 4-99 44th Drive. Any new development on these two properties would require the development of open space in accordance with the WAP.

Comment 90: Terminate or repurpose the City's lease of the existing Department of Transportation (DOT)-owned parking lot between 22nd and 23rd Street south of Queens Plaza to prioritize its use for upland park space. This site, currently leased for private use, presents a unique opportunity to deliver meaningful recreational access in one of the most park-deficient parts of the neighborhood. (CB2_Queens_002)

Response 90: Comment noted.

Comment 91: Carve out the public sites from the rezoning scope – public land belongs to us, the public, and should not be upzoned. It should be community and/or public space only, like the WQCLT's vision for the DOE building, which I support. (Berson_050)

Response 91: Comment noted. The Proposed Actions affecting the publicly owned sites located at 44-59 45th Avenue, 44-36 Vernon Boulevard and 4-99 44th Drive would deliver on goals of the neighborhood plan, including creating affordable housing and community-serving uses.

Comment 92: There is concern that a tall building may be planned to be built on the west side of the DOE building as well as on the north side. If this were to happen, it would essentially make the building not usable due to lack of light and air. We hope that there will be a connected park on the west side that will come up to the DOE building. (Mungo_WQCLT_058)

Public land should only be used for the public good. Therefore, I think the public sites should be exempt from the rezoning, like many community groups asked for. I support the WQCLT's vision for the DOE site on Vernon Blvd as well as the LICC's resiliency plan for the waterfront. (Brown_WQFC_061)

Response 92: Comment noted. See response to Comment 89.

Comment 93: I support the Western Queens Community Land Trust's vision for the DOE site on Vernon Boulevard, as well as the Long Island City Coalition's Resiliency plan for the waterfront. (Brown_WQFC_065)

I strongly support the Western Greens Community Land Trust Group's Vision for the DOE Building. (Brooks_LICC_WQCLT_066)

I also hope you'll be supportive of the Western Queens Community Land Trust plan to turn the DOE building into a community space that will help link the very disparate world of the luxury towers in Hunters Point South with the underserved and desperately underfunded residences of Queensbridge Houses. (Brooks_LICC_WQCLT_066)

Response 93: Comment noted. See response to Comment 89.

Comment 94: I'm here representing the Western Queens Food Co-op that is a community owned grocery store. So residents can have access to fresh, affordable food. Because commercial rents are so high, we're thinking we might only be able to have a brick and mortar store if we can access below market rates, and one hope for this is the DOE building. If the site is exempted from the up Zoning and the Western Queens Community Land Trust, a community controlled not-for-profit can adapt the building into the Queensboro people, space creating affordable commercial rents for small businesses, working artists, and nonprofits. (Brown_WQFC_065)

Response 94: Comment noted.

Comment 95: Community residents have asked for not-for-profit uses on all public sites in Anable Basin, including a sustainable public park and a permanently affordable manufacturing, cultural, and community hub at the city owned DOE building public land should be developed for public good. (Dubnau_WQCLT_072)

Over and over, community residents have asked for not-for-profit uses on all of the public sites at Anable Basin, including a sustainable public park, and a permanently affordable manufacturing, cultural and community hub at the city-owned DOE building for small businesses and artists who are rapidly being priced out of LIC. Any development on public land should be developed for public good: it should be 100 percent affordable and environmentally sound. (Dubnau_WQCLT_126)

Response 95: Comment noted.

Comment 96: Vote no on the rezoning, unless there is a prioritization of longstanding community-led plans for the public sites, and a commitment to keeping all public sites out of private hands. (Herrera_WQCLT_073)

Response 96: Comment noted.

Comment 97: Social housing is the only worthwhile housing to build to break the commodification model. Collaborate with private developers sure, but don't let them buy the land. CLT or bust. (Hansen_116)

Response 97: Comment noted. Social housing is outside the purview of the Proposed Actions and environmental analyses under CEQR.

PURPOSE AND NEED

Comment 98: OneLIC is proposing to give private developers valuable publicly owned waterfront properties and unlimited building heights with the most minimal returns to the public. The LIC community deserves to capture some of the billions of dollars in added value that private developers are getting from being allowed to appropriate public land and upzone with as much as 100+ stories of added space to sell and rent. That land value capture is necessary to manage 40,000 or more new residents and workers. (LICC-HPCC_001)

Response 98: The redevelopment of City-owned property would provide tangible public benefits, including affordable housing, waterfront open space, and other community facility space.

Comment 99: The Vision Plan rises to this valuable opportunity by creating a unified, resilient waterfront neighborhood—showcasing robust resiliency, respect for environmental resources, balanced growth of a productive and diverse economy, equitable distribution of economic development and public benefits, and sustainable connections—that achieves the promise and hopes of this community.

In contrast to the fragmented approach used by OneLIC, LICC/HPCC looks forward to developing a comprehensive framework for the sustainability of Hunters Point North based on the Vision Plan for Resiliency, supporting the needs of LIC's vibrant neighborhoods and bringing public and private sectors together to collaborate with the community on mutually beneficial plans. (LICC-HPCC_001)

The City and Council Member should include and utilize resiliency plans developed by local community groups such as Long Island City Coalition, within this rezoning area; serious consideration to including their recommendations in the plan must be given if this is indeed a community-led effort. (CB1_Queens_150)

Response 99: Comment noted. As discussed in Chapter 1, "Project Description," the Proposed Actions are intended to facilitate new residential space (including approximately 3,245 to 4,867 affordable units), commercial, community facility, and industrial development. The Proposed Actions would create needed housing and jobs for New Yorkers, and up to 6 acres of new open space, including waterfront open space. The modified WAP uses incentives to ensure a variety of active and passive recreational features, and includes more robust elevation requirements to create a more resilient waterfront, ensuring the waterfront is accessible in the long term. New developments in the floodplain would be constructed in accordance with, and potentially exceed, flood resilient construction standards. Additionally, the Unified Stormwater Rule, modified in 2022, requires that sites over 20,000 square feet manage stormwater on site, emphasizing detention, retention, and green infrastructure practices to reduce overall load on existing stormwater and sewer infrastructure during rainfall events.

Comment 100: Portions of the rezoning fall within the Long Island City Industrial Business Zone (IBZ)—which the City pledged not to rezone for residential use. This DEIS breaks that commitment, displacing industrial employers and replacing them with market-rate housing. CEQR requires consistency with adopted public plans. By upzoning IBZ parcels for residential development, this plan undermines the stated goals of the LIC IBZ and NYC's industrial job retention strategy. The DEIS must explain how this rezoning complies with IBZ protections or admit it is in direct conflict with City policy. (LICC-HPCC_001)

Response 100: Comment noted. As described in Chapter 1, "Project Description" of the DEIS, no portion of the existing Long Island City Industrial Business Zone (IBZ) would be rezoned as part of the Proposed Actions to allow residential use. Compatibility with existing land use, zoning and public policies is provided in Chapter 2, "Land Use, Zoning and Public Policy" of the DEIS.

Comment 101: This plan and proposed action are urgently needed. New York City is facing a significant housing crisis as demand for housing units,

particularly affordable ones, is at an all-time high. The city faces a historically low rental vacancy rate of just 1.4 percent.

in addition, by the year 2040 the city could lose up to 19,000 homes due to coastal flooding, a situation that will only exacerbate housing scarcity. Long Island City faces a dual challenge of managing significant climate risk while accommodating substantial housing growth to effectively tackle this complexity. The proposed plan prioritizes policies that integrate climate, resilient, multipurpose open space with mixed use and affordable housing development (Kim_RPA_067)

Response 101: Comment noted.

RESILIENCY AND CLIMATE CHANGE

Comment 102: We are frustrated that, while OneLIC claims to reflect "many years of planning" with the input of the local community, a significant number of issues raised repeatedly for decades by residents and businesses in the course of earlier actions as well as during the OneLIC process itself—such as resiliency—are dealt with in superficial, inadequate ways and still go unaddressed.

Sea level rise, increased precipitation, heavy downpours, and rising temperatures amplify the threats. The passive, disconnected property-by-property approach proposed by OneLIC has already been discredited in previous upzonings like Greenpoint and will only increase the vulnerabilities of the larger LIC neighborhood to flood risks.

The LIC community aligns with some of the stated intentions of OneLIC, however we serious doubt that the proposed actions will achieve those goals. Without a comprehensive plan in place to combat storm surge, sea level rise and increased precipitation, OneLIC's proposals lack credibility and may literally be washed away. (LICC-HPCC_001)

Response 102: See response to Comment 138 for a description of the regulatory and program requirements associated with developing in the floodplain. Development facilitated by the proposed actions would be required to address storm surge, sea level rise and increased precipitation through a variety of measures, including the requirements of the proposed Waterfront Access Plan, existing Building Code requirements, and the unified stormwater rule. New development in the floodplain would be required to meet Building Code Appendix G requirements through strategies such as engineering controls to raise the lowest floor of buildings above the

BFE and implementing other flood-proofing measures like installing flood barriers and floodproofing buildings. The WAP is a significant opportunity to address a key segment of vulnerable, low-lying shoreline. The target shoreline elevation required by the WAP exceeds projections for future high tides through the 2100s. Further consideration of climate change and adaptation to future flooding and sea level rise conditions is discussed in Chapter 2, "Land Use, Zoning, and Public Policy," of the DEIS, which evaluates consistency with the policies of the New York City Waterfront Revitalization Program. The modified WAP would ensure a variety of open space uses, both active and passive along the waterfront. It would require more robust elevation requirements to create a resilient waterfront, ensuring the waterfront is accessible in the long term. The proposed mapping actions would accomplish a long-held community goal of connecting Gantry Plaza State Park to the south to Queensbridge Park to the north. The new waterfront open space would utilize natural materials like sand, and native coastal vegetation, and could include rain gardens, permeable pavement, and green roofs, which help capture stormwater runoff and reduce flooding. The modified WAP would ensure a variety of open space uses along the waterfront.

Comment 103: Require developers to submit designs for all public and privately owned waterfront sites for Waterfront Edge Design Guidelines (WEDG) verification. (CB2_Queens_002)

Response 103: Comment noted. The goals of WEDG and waterfront zoning are very aligned: both WEDG and the waterfront zoning recognize the need to balance long-term resilience with the public's enjoyment of the waterfront. Certain elements of WEDG go beyond the scope of what zoning can require and the proposed actions, and the City does not have the authority to require all waterfront developments to pursue WEDG certification. The proposed actions do not preclude individual waterfront sites from pursuing WEDG certification on their own.

Comment 104: The DEIS did not address our concerns about flooding and upgrading the infrastructure needed to manage flooding that will happen. (Mungo_WQCLT_058)

The Board is concerned that the significant influx of new residents and workers, as well as construction of larger scale developments will further burden this part of CD1 Q that already deals with frail and insufficient public utility services and impact of climate change. (CB1_Queens_150)

Response 104: The EIS includes a detailed analysis of the Proposed Actions' effects on water and sewer infrastructure in accordance with *CEQR Technical Manual* methodology. In Chapter 11, "Water and Sewer Infrastructure." Also see response to Comment 79 for a description of the regulatory and program requirements associated with developing in the floodplain.

Comment 105: The proposed plan does not address the impact of climate change on the surrounding community. (Greenberg_064)

We need a connected waterfront that's also resilient to changes we know are coming, because climate change. (Guttmann_085)

Response 105: See response to Comment 142. The EIS includes a detailed analysis of the Proposed Actions' effects on greenhouse gas and climate change in accordance with *CEQR Technical Manual* methodology in Chapter 16, "Greenhouse Gas Emissions and Climate Change."

Comment 106: The conditions mentioned by Community Board 2, for investments in infrastructure, green space, and resiliency are critical. It is a flood zone that is something that we need to address. (Celestin_080)

Response 106: Comment noted. The EIS includes detailed analysis of the Proposed Actions' effects on infrastructure, open space and resiliency in Chapter 11, "Water and Sewer Infrastructure," Chapter 5, "Open Space," and Chapter 16, "Greenhouse Gas Emissions and Climate Change." If significant adverse impacts have been identified, mitigation measures are described in Chapter 21, "Mitigation."

Comment 107: Another argument is [that] Long Island City is a flood zone. But first of all, I think the concept of a flood zone is sort of obsolete. We've seen floodings in places that nobody in the past two years that nobody 10 years ago thought of as flood zones we've seen, for example, flooding in places like forest hills. Furthermore, if we're going to build housing anywhere near a quote unquote flood zone, it should be taller buildings so that people can essentially escape flooding, they can get higher floors. (Lewyn_TLC_095)

There should be no new residences built in this area until the infrastructure is created to support them and in no case should more be constructed at the edge of rising sea levels (the East River is a tidal estuary, after all) and the waterfront affected by the

rezoning encompasses one of the lowest spots in the Queen's flood plain. (Brooks_LICC_WQCLT_118)

Response 107: The DEIS considers not only current but future projected floodplains when discussing flood risk. Appendix C of the DEIS, "Waterfront Revitalization Program Policy Assessment," evaluates the exposure of identified projected development sites to current and future flood risk for the 2050s, 2080s, and 2100s, identifies the development sites most vulnerable to sea level rise and coastal flooding and discusses the measures to address current and future coastal flooding at these sites, including flooding from storm surge. While site-specific designs are not yet available, future developments would be required to have finished floor elevations at or above the most restrictive design flood elevations in compliance with the New York City Building Code. This includes elevating residential units and critical mechanical equipment at or above future flood elevations.

Comment 108: We are most concerned that OneLIC calls for disposition of the neighborhood's last public riverfront properties by Anable Basin. These properties are in an evacuation zone at the low point of the Hunters Point floodplain and needed for resiliency, open space, and infrastructure, as prescribed for decades. (Goren_LICC-HPCC_134)

Response 108: Comment noted. See response to Comment 43.

TRANSPORTATION

Comment 109: Create a long-term streetscape master plan, including the Queens Waterfront Greenway project and DOT's Citywide Greenways Plan (currently in development), that reserves right-of-way for future improvements, such as wider sidewalks, wide bike lanes, green infrastructure, and transit accessibility features. (CB2_Queens_002)

Response 109: Comment noted. A long-term streetscape master plan is beyond the purview of this environmental review. However, as part of the neighborhood planning process, DCP will continue to work with partner agencies to develop public realm strategies.

Comment 110: Actively apply the zoning frameworks that require or encourage developers to fund transit improvements like new station entrances or ADA-compliant elevators as part of their projects. This would leverage private investment to address transit accessibility and

capacity needs, especially in high-growth areas near major subway hubs. (CB2_Queens_002)

Response 110: The Proposed Actions would extend applicability of the Transit Improvement Bonus Program to portions of the Project Area that would be mapped with underlying R9 and R10 zoning districts, M1 districts paired with a residence district, and M1-6 zoning districts. Zoning requires properties in eligible zoning districts within 50 feet of a mass transit station to coordinate with the transit agency on potential station improvements and, if determined to be necessary, provide the volume in which those improvements can be constructed. For properties beyond 50 feet of a mass transit station, eligibility for an elective floor area bonus in exchange for off-site station improvements extends to zoning lots located within 500 feet of a transit station or within 1,500 feet in the designated Central Business District of Long Island City. By newly mapping eligible zoning districts, the Proposed Actions create further opportunities for developers to contribute to station improvements and greater accessibility both within and beyond the study area.

Comment 111: This Plan should also maximize walkability—pedestrian safety and access (can you walk or take public transport to get everything you need?) Parking for delivery vehicles for businesses needs to be carefully considered and is needed, but parking for person vehicles should be actively discouraged. (Fowler_005)

Response 111: Comment noted. The Proposed Actions seek to enhance public realm conditions, encourage walkability, activate streetscapes, and improve circulation. The proposed Zoning Text Amendment to special district regulations would mandate streetscape improvements and ground floor design standards to enhance pedestrian experience. As noted in Chapter 8, “Urban Design and Visual Resources,” to enhance walkability and the pedestrian experience, the Proposed Actions would apply streetscape requirements along key commercial corridors, including curb cut limitations, transparency and/or blank wall mitigation on the ground floor, regulations for screened parking, and ground-floor use requirements that can help bring new services and amenities to the neighborhood.

Comment 112: [There is a] lack of a well-planned street and transit network that adequately serves the proposed mix. of residential, commercial and industrial uses. (Hunter_033)

Response 112: As described in Chapter 1 of the DEIS, “Project Description,” the Proposed Actions include changes to the city map that would reconnect the area to the street grid and surrounding communities. The transportation analyses in Chapter 14 of the EIS assesses the potential for the RWCDS associated with the Proposed Actions to result in significant adverse impacts to all modes of transportation serving the Project Area, including roadways, sidewalks, transit services and parking.

ZONING

Comment 113: Apply a downzoning framework to M1-4A, M1-5A, M1-6A, and M2-3A districts, paired with targeted FAR bonuses that incentivize affordable creative, artisan, and maker spaces. This would promote economic diversity while retaining the area's unique mixed-use identity. (CB2_Queens_002)

Response 113: As discussed in Chapter 1, “Project Description,” the upzoning in the IBZ’s M-districts under the Proposed Actions is intended to provide the opportunity for existing businesses to expand and introduce new businesses to the neighborhood. According to the assessment contained in Chapter 2, “Land Use, Zoning, and Public Policy,” the increase in density and the expansion of allowable non-residential uses in the IBZ supports public policies to foster industrial retention, new and innovative industries, and promote job growth.

Comment 114: Shift the district north to the north side of 46th Avenue. Preserve the midblock between 46th Avenue and 46th Road where dozens of established small businesses and artisans contribute to Hunters Point's historic fabric. (CB2_Queens_002)

Response 114: Comment noted. Removal of this portion of the project area does not respond to the goals of the neighborhood plan to generate significant new housing, including affordable housing.

Comment 115: Keep the area between 46th Road and 47th Avenue as Ml-4/ R6B (see diagram below). Development here is already underway under existing zoning and reflects a healthy blend of residences and small businesses. Avoid rezoning that would intensify speculative pressure or destabilize this equilibrium. (CB2_Queens_002)

Response 115: The area between 46th Road and 47th Avenue, bounded by Vernon Boulevard and 5th Street is currently zoned M1/R6A, R6A/C1-5 and M1-4. The areas zoned M1-4 are largely vacant.

Comment 116: Mandate the NYC EDC and SBS to monitor commercial rent trends in at-risk zones and develop targeted grants for small businesses facing rent increases and employee hiring needs. (CB2_Queens_002)

Response 116: Comment noted. This request is outside of the purview of the Proposed Actions, however, DCP will continue to work with partner agencies throughout the neighborhood planning process.

Comment 117: Provide financial assistance for owners facing rising property taxes and mandatory sewer upgrades triggered by zoning changes or development-related infrastructure requirements. (CB2_Queens_002)

Response 117: Comment noted. This request is outside of the purview of the Proposed Actions, however, DCP will continue to work with partner agencies throughout the neighborhood planning process.

Comment 118: Redesign IBZ streets to support pedestrian movement, street trees, and goods movement, creating shared streets that reinforce the area's industrial-residential mix. (CB2_Queens_002)

Response 118: The IBZ is intended to protect commercial, industrial and manufacturing tenants and businesses. However, the Proposed Actions would apply streetscape regulations to new developments along key corridors within the IBZ, including curb-cut limitations, transparency and/or blank wall mitigation on the ground floor and regulations for screened parking that can create an engaging atmosphere for pedestrians.

Comment 119: Promote full-service grocery stores, especially in underserved and walkable areas, including around NYCHA developments. This should include the use of ground floor commercial space in IBZ and mixed-use zones for food retail. Partner with EDC, SBS, and DCP to create rent subsidies or tax incentives for grocers and bodegas providing fresh food options, modeled after successful development in other cities. Establish a centrally located greenmarket that serves all LIC residents by utilizing a temporarily closed street grid to maximize accessibility without taking away

parkland. Prioritize pedestrian access and community programming. (CB2_Queens_002)

Response 119: Comment noted. Retail use would be permitted throughout the Project Area, including rezoned areas adjacent to Queensbridge Houses. Additionally, the blocks north of Queens Plaza North within the Project Area are currently within a FRESH zone with both zoning and discretionary tax incentives when a grocery store is provided within a new development. Rent subsidies and tax incentives are beyond the purview of the Proposed Actions.

Comment 120: Slightly reducing the as-of-right development potential—such as shifting from R10 to R9—creates a meaningful tradeoff that steers developers toward using zoning bonuses in exchange for delivering critical public benefits. This adjustment preserves the overall development potential for approximately 14,700 new dwelling units but ensures that growth is contingent on tangible community benefits rather than guaranteed as-of-right. An R9 base allows the City to restore density via bonuses while more effectively leveraging private development to meet public needs. (CB2_Queens_002)

Response 120: The densities sought under the Proposed Actions are intended to maximize the amount of needed housing, including affordable units, and commercial space in a transit rich area to support the Purpose and Needs of the Proposed Actions presented in Chapter 1, “Project Description,” of the EIS. Floor area bonuses as outlined in the Proposed Actions would provide additional amenities to the neighborhood.

Comment 121: Remove Unlimited Height Provisions where they are currently proposed. While we support DCP's goals of reducing building bulk and encouraging design flexibility, we are concerned about the unpredictability of unlimited height. We urge DCP to reevaluate and replace these provisions with defined height limits that balance flexibility with neighborhood context. (CB2_Queens_002)

Response 121: Building heights were assessed in Chapter 8, “Urban Design and Visual Resources.” There would be no height limit for buildings along the waterfront and in Inland Subarea 1, nearest to Court Square and Downtown Long Island City Central Business District, which is mapped with an R-10 district that has no height limits. The DEIS concludes that the Proposed Actions would facilitate built forms that are complementary to the prevailing context but that also accommodate the new uses at higher densities.

Comment 122: In the block immediately east of Queensbridge Houses, reduce maximum residential zoning from R10 to R8, to respect the scale of this historic development and reduce shadow impacts on the historic grounds, residential buildings, and rooftop Community Solar installation on buildings at the southeast corner of the NYCHA development. (CB2_Queens_002)

Building heights east of Queensbridge Houses (Blocks 411 and 412) are too tall. The proposed R10 district should be changed to a lower density district with maximum heights between 10 and 20 stories. (CB1_Queens_150)

Response 122: Comment noted. The M1-6A/R10 district was proposed based on proximity to transit and the existing context of the Queens Plaza area to the east and south.

Comment 123: I support the revised zoning plan from City Planning with SPP Cornerstone being rezoned from M1-4 to M1-5A for Block 458, Lot 129, and Block 458, Lot 87. (Chang_004)

Response 123: Comment noted.

Comment 124: I represent a few of small businesses and property owners along 21st Street between 39th and 40th Avenue, north end of this study. Our Block, 392, is now proposed to be M1-5A. We appeal to modify it to Mixed Use allowing housing for the following reasons and realities.

How can a 45-foot container truck or industrial vehicle be safely and legally operated on a street that includes bus-only lanes, bike lanes, a central pedestrian passage, and unpredictable foot traffic such as children running across?

The proposed M1-5A prevent us from getting necessary funding from investors to rebuild due to financially not feasible. (Hsia_007)

Response 124: Comment noted. The properties referenced in the comment are located within the LIC IBZ. The Proposed Actions would increase the permitted commercial and manufacturing FARs and align with a citywide policy to not permit new residences in IBZs.

Comment 125: While the proposed 3.5 million square feet of commercial space to be added may sound substantial, it is important to put that figure in context. The rezoning area appears to cover roughly 225 acres (according to Google maps). Even conservatively removing a third for streets and public infrastructure, we are left with a potential of

nearly 20 million buildable square feet assuming just a 3.0 FAR, the lowest tier in the plan. In that light, the OneLIC plan to potentially build only 3.5 million square feet of commercial space feels like a missed opportunity. (Wax_009)

Response 125: As outlined in Chapter 1, "Project Description," of the DEIS, the Proposed Actions are anticipated to create approximately 17,400,000 additional gross square feet of floor area to the Project Area. Commercial uses represent the second largest share of this floor area at approximately 3,400,000 after residential uses at approximately 14,400,000 gross square feet.

Comment 126: The M1-4A/R8A corridor on 44th Drive allows for new construction completely out of scale with existing development in this corridor. The corridor should be reduced to M1-3A/R7A proportions and extended to 44th Road. Furthermore, the M1-6A zone should under no circumstances be allowed to abut the more modestly scaled 44th Drive corridor. (Ort_045)

Response 126: Comment noted. Portions of 44th Drive are currently zoned a similar M1-4/R7A districts. Maintaining this district would not advance goals outlined in the neighborhood plan to create additional housing at a range of income levels and to map MIH to portions of the Project Area.

Comment 127: I am writing as a resident of 47th Street to express strong support for expanding the zoning proposal for the OneLIC project to include the remaining two blocks near our street. At the recent hearing on July 30, I noted that the current plan stops short of our block, which leaves our community excluded from much-needed growth and improvements. (Harmath_049)

Response 127: Comment noted. Expanding the Project Area is not within scope of Proposed Actions.

Comment 128: People also urged DCP to study the impacts of employing DCP's new manufacturing district, M-CORE, in the Long Island City IBZ. (Wolf-Powers_WQCLT_052)

Response 128: Comment noted.

Comment 129: With the zoning proposals, the existing industries will not be able to afford or keep their space if the scenario plays out as proposed. While in principle the proposal that would combine an existing M zone with an R zone to become mixed use with light industrial and

residential space, sounds like a beneficial way to encourage industries to move into the area, however one main parameter is neglected: This mix does not guarantee that the property owners will save space for light or any industry at all.

The area needs what I call Mandated Inclusionary Manufacturing. Property owners need to be given incentives to maintain the industries that are there, and industrial tenants must have the ability to work in affordable space and stay where they are or what will continue to occur here is what has happened in the Garment District—manufacturing tenants are being pushed out because of the high value of the real estate for other uses. Thus, industrial use needs to be mandated with a specific percentage of space per mixed-use building, not only allowing it to occur and it magically appearing because of the kindness of a property owner. (Rappaport_060)

In any new development in the Dutch Kills subarea, designate 20 percent of commercial/industrial/manufacturing floor area for below-market affordable rents to non-profits, artists, cultural, worker cooperatives, industrial and small local business tenants. Any publicly-owned site in the rezoning area that is developed for non-residential purposes shall have a minimum of 80 percent of floor area reserved for below market affordable rent to be utilized by non-profits, artists/cultural organizations, community land trusts/partners, worker cooperatives, small local manufacturers/industry, and others dedicated to public good/community benefit. (CB1_Queens_150)

Response 129: Comment noted.

Comment 130: The plan, as we know, allows unrestrictive R9 and R10 towers that are not only in an evacuation flood zone, but the unrestricted heights come, with other exceptions, that from what I understand, do not require trees, setbacks, or wider sidewalks that are so critical. The M1-4A/R8 corridor on 44th Drive allows for new construction completely out of scale with existing development in this corner, the corridor should be reduced to M1-3A/R7A proportions, and extended to 44th Road. The M1-6A zone should under no circumstances be allowed to abut the more modestly scaled 44th drive corridor. (Limbert_062)

Response 130: Comment noted. See response to Comment 126 regarding density along 44th Drive. M1-6A/R9, M1-6/R9, M1-6/R10 and M1-6A/R10 districts have maximum base heights from which a setback is required. Street trees are also required for all new developments

at measured at 25-foot intervals of linear sidewalk. Additionally, the Proposed Actions include a sidewalk widening requirement along portions of 45th Avenue.

Comment 131: The Commission should consider extending the proposed bulk and residential use changes to all parcels within the waterfront subdistrict. This includes the Con Edison training facility and parcels currently zoned for manufacturing west from Vernon Boulevard in between 44th Avenue and Queensboro Bridge (Kim_RPA_067)

Response 131: Comment noted. Understanding the Con Edison Learning Center's intention to remain in the long term, no changes to zoning districts are proposed at this site. Additionally, the properties to the north of the Con Ed property are currently zoned for high-density, mixed-use development in line with the goals of the Proposed Actions.

Comment 132: The proposed M1/5A prevents us getting funding from lender due to financially unfeasible without residential components. By saying this, we are not against [the] 20-year-old IBZ policy. We appeal for your support. Figure out a way to modify Block 392 to mixed use, including houses. It will bring in cleaner, safer streets. Better house, better business, opportunity. (Hsia_090)

Response 132: See response to Comment 124.

Comment 133: While I'm excited by the new homes that will come from this. I personally think we should be thinking even bigger. I urge members to consider improving all areas under R9 to match the possibilities enabled by such dense zoning. Long Island City is no stranger to higher density. Living and going higher is perfectly in line with surrounding context. (Chandross_104)

Response 133: Comment noted.

Comment 134: We respectfully appeal to the Commission to amend the designation of Block 392, currently proposed as M1-5A within the Industrial Business Zone (IBZ), to a Mixed-Use zoning that allows residential development.

Amending Block 392 to allow Mixed-Use zoning with residential development would:

- Promote environmental sustainability
- Create cleaner and safer streets

- Enable the development of affordable housing for multi-racial, hard-working families and individuals. (Hsia_137)

Response 134: See response to Comment 125.

Comment 135: Since each block (Blocks 411 and 412) is in single ownership and not likely to be subdivided, approaching the rezoning rea as a Large-Scale General Development plan might instead maximize density more, achieve a better design with less visual and shadow Impacts and secure a public benefit such as open space without resorting to mapping one of the highest zoning districts in the city. A mid-range R7 or R8 zoning district on these sites would encourage that approach. (CB1_Queens_150)

Response 135: Comment noted. The pursuit of a Large-Scale General Development is beyond the purview of the Proposed Actions and, as a result, not included in the environmental review.

Comment 136: Limits should be established for building height when applying bonus floor area from available programs such as Quality Housing, MIH and/or Transit Improvement incentives to new developments. (CB1_Queens_150)

Response 136: Comment noted. Where a zoning district is proposed with no height limit, no additional height limit is provided when a floor area bonus is applied. Where a zoning district is proposed with a height limit and a floor area bonus is sought for a public plaza, the maximum height may not exceed 25 percent of the maximum building height otherwise permitted in the underlying district.

Comment 137: Eliminate a proposed Text Amendment that establishes a CPC authorization to grant a floor area bonus in exchange for publicly accessible open space. Any development under the new higher density zoning contributes to the increasing need for more publicly accessible open space in Dutch Kills. The city should, instead, require open space for public use to mitigate the project's impact on the local community (amount to be determined by degree of impact). (CB1_Queens_150)

Response 137: Comment noted. The proposed CPC authorization to grant floor area bonuses in exchange for publicly accessible open space is intended to foster the creation of much-needed open spaces within the project area.

Comment 138: Revise the boundaries in a proposed Text Amendment that creates the Queens Plaza West (QPW) Subdistrict Map. The CD1 Q rezoning area is proposed to be included in the new QPW Subdistrict that lies within CD2Q. Those six blocks, separated from CD2, are adjacent to and should be subject to regulations within the Dutch Kills Subdistrict or the Queens Plaza Subdistrict. Development on those blocks should reflect the surrounding context and scale, planning and development issues. (CB1_Queens_150)

Response 138: Comment noted. Subdistrict boundaries were drawn to align with the Project Area and to provide sites within the subdistrict with access to new authorizations and provisions to incentivize neighborhood amenities such as public plazas and schools.

Comment 139: Require accessible public open spaces at ground level for any new development within the LIC Special District and the Dutch Kills Subdistrict. Such space should exceed the minimum required by zoning, be open to the public from dawn to dusk and not receive floor area bonus in return. (CB1_Queens_150)

Response 139: Comment noted. The proposed CPC authorization to grant floor area bonuses in exchange for publicly-accessible open space is intended to foster the creation of much-needed open spaces within the Project Area.

LAND USE, ZONING, AND PUBLIC POLICY

Comment 140: The DEIS claims consistency with City policy, including the City of Yes initiatives and the Waterfront Revitalization Program (WRP), but offers no substantive analysis of trade-offs. The document assumes alignment without weighing how industrial loss, open space reduction, and school overcrowding may undermine these very goals. Under CEQR, public policy analysis must clearly explain how a project supports or hinders specific elements. Here, the DEIS selectively references goals like affordability or economic growth while ignoring the policy mandates to protect industrial jobs and waterfront access. (LICC-HPCC_001)

Response 140: The DEIS includes a detailed consistency assessment of the Proposed Actions relative to the policies of New York City's Waterfront Revitalization (WRP). As detailed in Chapter 2 of the DEIS, "Land Use, Zoning, and Public Policy," the Proposed Actions are consistent with the City's WRP. The WRP Consistency Assessment Form (WRP #25-025) was reviewed and found to be

consistent with the City's policies. The primary purpose of an Environmental Impact Statement is to inform decision-makers, such as the City Planning Commission (CPC), as well as the public, about the potential environmental consequences of a proposed action. It serves as a tool to ensure that environmental factors are thoroughly considered during the planning and decision-making stages. It is the decision-makers, and not a technical EIS document, that considers the potential trade-offs associated with approval or disapproval of a project and its environmental consequences. The DEIS includes a comprehensive and detailed analysis of the proposed land use and zoning changes and the public policy implications of those changes in Chapter 2. The DEIS discloses the potential for significant adverse impacts related to open space, schools and other technical areas. These significant adverse impacts will be weighed against the public good and objectives of the Proposed Actions when decision-makers like the CPC and City Council consider approval of the Proposed Actions.

Comment 141: Much of the plan area lies within FEMA's 1 percent and 0.2 percent flood zones. The DEIS assumes compliance with NYC Building Code flood elevations on a site-by-site basis as sufficient mitigation for the entire 150+-acre flood plain. In addition, the DEIS provides no analysis of compound flooding, storm surge, wave action, or sea level rise. CEQR requires a "reasonably foreseeable conditions" analysis, especially in flood-prone areas. There is no modeling of future precipitation intensity or backflow and erosion from storm surges. The DEIS must present a lot-by-lot coastal flood risk and adaptation plan. Simply citing individual building code compliance is not enough under CEQR floodplain guidance. (LICC-HPCC_001)

Response 141: Comment Noted. As discussed in the DEIS, the Proposed Actions are zoning changes that would affect a number of privately owned properties. Decisions regarding construction and building design for those sites would be made by the property developers in accordance with the City requirements (within both the building code and/or per requirements of the proposed Waterfront Access Plan) at the time of development. While specific building and site designs are not known at this time, a significant amount of flood resilient construction will be delivered upon the development of many sites both within and outside of the waterfront subarea. Flood resilient construction or provisions in the Zoning for Coastal Flood Resilience text amendment (adopted in 2021) will be immediately

applicable to the buildings containing over 73% of projected development units, per the Waterfront Revitalization Program policy analysis in Appendix C of the DEIS. Beyond building code compliance, any projects receiving funding from the New York City Housing and Preservation Department (HPD) are required to meet the agency's resiliency guidelines, which incorporate the City's Climate Resiliency Design Guidelines definitions and climate projections, and require that new construction be floodproofed up to the projected 2080s Design Flood Elevation. HPD's resiliency guidelines place emphasis on the modernization and protection of critical infrastructure such as heating and cooling systems, domestic hot water systems, and adequate backup power generation

Comment 142: The Final EIS must be proactive about climate change. Recall that Superstorm Sandy submerged parts of Hunters Point beneath over 6 feet of water from storm surge—and risks from climate change have only increased. Today, the major hazards are from storm surge, which the Draft EIS, despite claiming to be a resilient plan, utterly ignores. Sea level rise, increased precipitation, heavy downpours, and rising temperatures amplify the threats. (LICC-HPCC_001)

Response 142: Appendix C of the DEIS, Waterfront Revitalization Program Policy Assessment," considers the exposure of identified projected development sites to current and future flood risk for the 2050s, 2080s, and 2100s, identifies the development sites most vulnerable to sea level rise and coastal flooding and discusses the measures to address current and future coastal flooding at these sites, including flooding from storm surge.

New buildings within the current 1 percent annual chance floodplain would be built in accordance with Appendix G of the New York City Building Code "Flood Resistant Construction," which regulates construction and substantial building improvements in flood hazard areas. Appendix G requirements for construction in the special flood hazard area dictate that enclosures below the DFE are wet floodproofed, which includes sealing walls and foundations, installing watertight shields or panels at windows and doors, and installing temporary flood barriers, stairs, or ramps. Additionally, uses must be limited to vehicle parking, storage, or building access.

Future developments would be required to have finished floor elevations at or above the most restrictive design flood elevation

in compliance with the New York City Building Code. Although specific building designs are not yet proposed, any necessary wet or dry flood protection measures would be incorporated and required for construction bids. Any residential dwelling units and critical infrastructure in buildings proposed within the 1 percent annual chance floodplain would be required to be elevated above the DFE in accordance with Appendix G. It is expected that City-owned sites would also be required to comply with the Climate Resiliency Design Guidelines (CRDG), which provide a framework for going above and beyond Appendix G standards and are informed by both historic climate data and forward-looking climate data. Some of the proposed design features these guidelines list that go beyond Appendix G requirements include incorporating natural systems-based approaches where possible, such as living shorelines, installing perimeter floodwalls or levees, utility redundancy, and raising road elevations surrounding the site. Any projects receiving funding from the New York City Housing and Preservation Department (HPD) are required to meet the agency's resiliency guidelines, which incorporate CRDG definitions and climate projections, and require that new construction or substantial improvements be floodproofed up to the projected 2080s DFE. HPD's resiliency guidelines place emphasis on the modernization and protection of critical infrastructure such as heating and cooling systems, domestic hot water systems, and adequate backup power generation.

While new buildings or substantial improvements outside of the 1 percent annual chance floodplain would not need to comply with Appendix G of the NYC Building Code, the 2021 Zoning for Coastal Flood Resiliency text amendment allows building owners and developers both within and outside the current floodplain to proactively design new buildings or retrofit existing buildings to exceed existing flood resiliency standards by modifying underlying zoning restrictions.

In addition, the WAP would establish stricter coastal resiliency measures along the waterfront to help protect the study area from coastal flooding events. The Proposed Actions would result in a new resilient waterfront by raising the grade of the waterfront in connection with the construction of mixed-use developments. The modified WAP would create a continuous raised shoreline that would include a mix of hard infrastructure as well as natural features such as native coastal plantings to provide flood protection and erosion control.

Comment 143: The DEIS claims new high-rise residential and commercial towers are "compatible" with Dutch Kills, despite the existing context of low- to mid-rise industrial and mixed-use structures there. No mitigation is proposed for the resulting scale mismatch, infrastructure strain, or potential acceleration of indirect displacement. The lack of visual simulations, shadow analysis, or neighborhood character studies for Dutch Kills suggests an inadequate technical review, falling short of CEQR guidelines that require evaluation of scale, use, and trends relative to neighborhood context. (LICC-HPCC_001)

Response 143: As noted in Chapter 19 of the DEIS, "Neighborhood Character," Dutch Kills has a variety in scale of the built environment. The areas closest to the Project Area maintain a similar scale to that of the Proposed Actions with the proposed zoning districts declining in density as one travels further north into the neighborhood. As discussed in Chapter 2, "Land Use, Zoning, and Public Policy" and Chapter 8, "Urban Design and Visual Resources," new buildings developed in Inland Subarea 1, north of Queens Plaza North and east of Queensbridge Houses (and adjacent to Dutch Kills), would be consistent with mix of land uses that exist in the area and would be positioned adjacent to existing residential and commercial developments in Dutch Kills that include buildings of 212, 217, and 328 feet tall. The proposed zoning would require contextual base heights that would ensure the new buildings that result from the Proposed Actions would be compatible in scale to existing buildings located in adjacent areas of Dutch Kills, such as the buildings north of Queens Plaza North, between 23rd and Crescent Streets. Because the DEIS concluded that no significant adverse zoning or urban design impacts would result from the Proposed Actions, no mitigation was proposed in the DEIS, as it is not warranted. Comparison massings that show existing, No Action, and With Action photo simulations to depict anticipated building forms throughout the Project Area are included in Chapter 8 (see Figures 8-55 through 8-75). A detailed analysis of potential shadow impacts, including detailed shadow figures, are included in Chapter 6, "Shadows." An assessment of neighborhood character that draws on the detailed analyses contained in the land use/zoning, urban design, and shadows chapters of the DEIS is included in Chapter 19, Neighborhood Character," which includes a discussion of Dutch Kills.

Comment 144: The DEIS fails to justify the dramatic increase in floor area ratios (FARs) proposed throughout the Project Area, including new M1-

6A/R10 zones allowing 12 FAR—six times greater than existing conditions in some subareas. No clear rationale is given for the intensity of these rezonings relative to infrastructure capacity, environmental conditions, or local planning goals. Under CEQR, land use analyses must explain why such scale is needed to meet objectives. This unexplained upzoning could induce growth beyond what local services, transit, and open space can support, compounding impacts elsewhere. (LICC-HPCC_001)

Response 144: The proposed M1-6A/R10 district has a maximum FAR of 12.0 compared to the underlying M1-5, which has a maximum FAR of 5.0 for commercial and manufacturing uses, and a 6.5 FAR for community facility uses. See response to Comment 122 on rationale for the M1-6A/R10 district. The DEIS analyzes the Proposed Actions, which proposes new high density zoning districts to facilitate mixed-use buildings that provide residential, commercial, light manufacturing, and community facility space. The need for the density increase is discussed in Chapter 1, "Project Description," which includes a discussion of the outdated, restrictive zoning that is currently applicable to Long Island City and the need for increased residential, commercial, and light manufacturing densities to expand the supply needed housing, including affordable housing, and allow for the expansion of existing businesses and to attract new businesses to Long Island City. A detailed assessment of Land Use, Zoning and Public Policy is contained in Chapter 2, which concludes that the Proposed Actions would support new housing and jobs in a neighborhood with strong public transit access and in close proximity to the Central Business Districts of Long Island City and Midtown Manhattan. Further, the Proposed Actions would result new open space and a more resilient waterfront. A detailed analysis of the Proposed Actions' impacts related to transit is included in Chapter 14, "Transportation" and a detailed assessment of the potential related to infrastructure is included in Chapter 11, "Water and Sewer Infrastructure."

SOCIOECONOMIC CONDITIONS

Comment 145: While the proposed MIH provisions do guarantee creation of sorely needed income-restricted units, OneLIC's stated goal to "serve diverse types of households and family needs" is not met by the proposed plan. Instead, the area will be one of mostly very expensive transitory housing serving young professionals and those who want a part-time nest in the city, but who will leave after

they start families because of the lack of outdoor space for kids, the expense of private amenities, and the lack of family-sized units. (Hunter_033)

Response 145: Comment noted. See response to Comment 61.

Comment 146: Regarding the plan itself, I would like to point out that the OneLIC plan maps a street through the north side of the Vernon building – s a structure that is currently the subject of an EDC RFI aimed at adaptive re-use (see renderings attached). Other buildings permitted by new zoning would also compromise the Vernon building's functionality as a space for arts, culture and economic development. Adaptive re-use of the Vernon Building itself could be mitigative of the industrial displacement effects caused by the rezoning. But not if the city demolishes the structure (as the mapping of the street suggests that it intends to do). Concerns for both commercial and residential displacement, and serious discussions about mitigating them, have been downplayed throughout the engagement process. (Wolf-Powers_WQCLT_052)

Response 146: Comment noted. Chapter 3, "Socioeconomic Conditions," follows *CEQR Technical Manual* guidance in its findings of no significant adverse socioeconomic impacts warranting mitigation.

Comment 147: This community needs deeply affordable commercial and residential space. Light manufacturing and creatives have already been priced out of this geographic area. (Mungo_WQCLT_058)

The draft proposal claims it will create affordable housing and commercial spaces. But it will not be affordable for working class people, or for small businesses. This upzoning will displace us, just as Williamsburg & Greenpoint gentrification has displaced many long-term residents and mom & pop shops over the last 20 years. (Brown_WQFC_061)

Affordability should [be extended to] small business, artists, commercial tenants, manufacturing tenants, non-profits, and others will be at risk for displacement due to the rezoning. (CB1_Queens_150)

Response 147: As detailed in Chapter 1, "Project Description," the Proposed Actions reflect DCP's on-going community engagement process with local Community Boards, community residents, business owners, community-based-organizations, elected officials, and other stakeholders, to achieve several land use objectives, including: protecting existing affordable housing and generating

significant new housing, especially affordable housing that serves diverse types of households and family needs; and supporting existing businesses and the creative community, increasing local job growth, and improving access to diverse, high-quality jobs and training. Absent the Proposed Actions, the existing zoning will continue to produce substantially less housing than surrounding areas. Currently, no mechanism exists to mandate permanent affordable housing within the entirety of the Project Area. The Project Area's manufacturing districts will continue to be dominated by a range of industrial and commercial uses. Due to industrial uses' relatively low employment density, industrial employment in these areas would continue to decline or remain stable. The commercial uses would continue to expand in these districts following a pattern of increasing market trends for entertainment and eating establishments in Long Island City.

The Proposed Actions would implement the Plan by comprehensively updating zoning to permit a wider range of uses including residential, commercial, retail, light-industrial, arts-related, community facilities, and new open space. The assessments in Chapter 3, "Socioeconomics," identify the potential for indirect residential and business displacement as a result of the Proposed Actions, but does not find that these effects would result in significant adverse impacts on socioeconomic conditions within the study area.

Comment 148: Neighborhoods in NYC that have been upzoned like this have seen major racialized displacement of residents and small businesses. There's plenty of data that reflects this. (Dubnau_WQCLT_126)

Response 148: Chapter 3, "Socioeconomic Conditions," follows *CEQR Technical Manual* guidelines in its assessments of potential indirect residential and business displacement due to increased rents; these CEQR analyses do not consider the racial composition of the identified potentially vulnerable populations.

DIRECT BUSINESS DISPLACEMENT

Comment 149: The DEIS admits that 28 businesses employing 309 workers will be directly displaced—but claims this is not significant because they're not "essential." This is absurd. These include cultural institutions (Plaxall Gallery, Culture Lab LIC), construction and fabrication shops (Eventscape, Konduit NYC), and working-class jobs in manufacturing and auto repair. Displacement of this

magnitude—especially in an Industrial Business Zone—is a direct violation of CEQR's obligation to assess and mitigate job loss. The DEIS must provide a relocation strategy, analyze long-term economic effects, and disclose whether these jobs will be replaced with comparable employment. (LICC-HPCC_001)

Four arts and culture organizations—Culture Lab LIC, Plaxall Gallery, Dance Queen Fitness, and Miriam Vitale Studio—will be directly displaced by this plan. These are anchor institutions with deep ties to LIC's creative economy. The DEIS claims their removal is not significant because "similar services" exist nearby. But CEQR requires an assessment of whether displaced institutions shape neighborhood character, serve unique populations, or provide irreplaceable value. These arts spaces are irreplaceable, and their removal without relocation plans is a cultural erasure. The DEIS must provide an arts preservation and relocation plan. (LICC-HPCC_001)

The DEIS downplays displacement of businesses in the Long Island City Industrial Business Zone (IBZ), claiming the loss of 28 businesses and 309 jobs is insignificant. This fails to meet CEQR standards, which require[s] a detailed assessment when impacted businesses fall under public plans to preserve industrial jobs. The DEIS provides no analysis of how these businesses support neighborhood character or local economic diversity, nor does it assess if suitable industrial space exists for relocation. (LICC-HPCC_001)

Response 149: In response to these public comments, additional analyses related to the effects of direct displacement were conducted and incorporated into the FEIS. These additional analyses included updates to estimates of the numbers of potentially displaced businesses and employees; additional assessment of potentially displaced businesses' contributions to socioeconomic character and the anticipated business conditions in the future with the Proposed Actions within and outside the Long Island Industrial Business Zone (IBZ); and relocation opportunities for potentially displaced businesses. Please see Chapter 3, Socioeconomic Conditions of the FEIS.

The additional research and updates included in the FEIS found that there are up to 68 businesses employing an estimated 538 workers who have the potential to be displaced from Projected Development Sites as a result of the Proposed Actions; this includes an estimated 22 businesses within subareas of the Long Island City IBZ employing an estimated 226 workers. While there

is the potential for a greater amount of direct business displacement than estimated in the DEIS, the additional analysis detailed in this FEIS confirms that the Proposed Actions would not have the potential to result in significant adverse socioeconomic impacts.

As detailed in Chapter 1, “Project Description,” a purpose and need of the Proposed Actions is to support existing businesses and the creative community, increase local job growth, and improve access to diverse, quality jobs and training. The Proposed Actions—through the redevelopment of Projected Development Sites—provides new community facility, commercial, and light manufacturing spaces to support existing businesses and the creative community and increase local job growth opportunities. On sites where direct business displacement could occur, the Proposed Actions would by 2035 under the RWCDS provide approximately 200,000 gsf of community facility space, over 375,000 gsf of local retail space, over 3.4 million gsf of commercial office space, 345,000 gsf of life sciences space, and over 930,000 gsf of light manufacturing space. This space would support thousands of jobs in a variety of industry sectors. As the redevelopment of Projected Development sites would not occur all at once, potentially displaced businesses—including those with deep ties to Long Island City’s creative economy—would have the opportunity to relocate to newly built spaces at other Projected Development sites, or may relocate to existing comparable available spaces within and outside of the Project Area. As detailed in Chapter 3, “Socioeconomic Conditions,” of the FEIS, comparable spaces are available within the study area, within and surrounding the Long Island City IBZ, and more broadly within potentially displaced businesses’ trade areas.

As noted in the DEIS and FEIS, all businesses contribute to neighborhood character and provide value to the City's economy. The consideration of socioeconomic effects under CEQR is whether the businesses to be displaced provide products or services essential to the local economy that would no longer be available in its “trade area” to local residents or businesses due to the difficulty of either relocating the businesses or establishing new, comparable businesses. As detailed in the FEIS, the essential services provided by these potentially displaced businesses are expected to remain within the study area through existing businesses that would not be directly displaced; by businesses who relocate within the study area or a broader trade

area; and by businesses who locate within the new spaces facilitated by the Proposed Actions.

Regarding the Proposed Actions potential effects on arts and culture organizations, as detailed in the FEIS, the Proposed Actions could displace up to 12 businesses in the arts, entertainment, and recreation industries as well as other businesses that contribute to the area's arts and cultural economy. While these potentially displaced businesses shape neighborhood character and serve unique populations, they do not serve populations uniquely dependent upon their present location; potentially displaced businesses could relocate within or outside the study area within a trade area for their consumer bases. Even if businesses did not relocate within the study area, their displacement would not represent a majority of study area businesses or employment for any given industry sector, and there are alternative sources of goods, services, and employment provided within the study area. In the future with the Proposed Actions the community would continue to be defined by its arts and cultural economy, and through the redevelopment of Projected Development Sites with additional commercial and light manufacturing spaces, opportunity to support and foster growth in this economy.

Regarding the commenters assertion that the assessment fails to meet CEQR standards, based on *CEQR Technical Manual* guidelines (Chapter 5, Section 331.3) a preliminary assessment to determine the potential for significant displacement should consider whether there is the potential to displace a category of business that is the subject of other regulations or publicly adopted plans to preserve, enhance, or otherwise protect it. The *CEQR Technical Manual* example of a circumstance where more analysis would likely be warranted is the displacement of an industrial business in Long Island City's Industrial Business Zone to develop a non-industrial use that would not be permitted under current land use policies. The Proposed Actions would result in the direct displacement of industrial businesses within the Long Island City's IBZ, but it would not be for the purposes of developing non-industrial uses not permitted under current land use policies. Areas within the Long Island City IBZ would not be rezoned for residential use. The Proposed Actions would provide additional space for job growth and community-facing commercial and light-industrial uses within a subarea of the Long Island City IBZ that is within close proximity to residential population and transit. Warehousing and heaver industrial uses could relocate within or outside of the Long

Island City IBZ without substantial effects on community character, as they tend to serve customers within broader trade areas.

INDIRECT BUSINESS DISPLACEMENT

Comment 150: The DEIS admits that the new development could accelerate indirect business displacement, especially of small industrial or service-oriented businesses—but dismisses it because these trends are "already happening." CEQR doesn't allow adverse impacts to be ignored just because they're ongoing. This plan adds 14,699 housing units and thousands of high-income residents, fueling commercial rent increases. There is no mitigation for indirect displacement of auto shops, welders, or community-serving businesses. The DEIS must assess zoning tools to preserve affordable commercial space or face a finding of significant adverse impact. (LICC-HPCC_001)

Response 150: As detailed in *CEQR Technical Manual* Chapter 5, Section 332.3, the objective of the indirect business displacement analysis is to determine whether a project may introduce trends that make it difficult for those businesses that are essential to the local economy (as defined in Section 331.3) to remain in the area. The purpose of the preliminary assessment is to determine whether a project has potential to introduce such a trend. If this is the case, a more detailed assessment may be appropriate. As detailed in Chapter 3 of the DEIS/FEIS, the area is already experiencing a trend of industrial use turnover with the introduction of residential, office, and other types of retail uses. Many businesses are restricted from expanding offerings in response to the growing residential population directly to the north and the east. In the absence of the Proposed Actions, the Project Area's manufacturing districts would continue to be dominated by a range of industrial and commercial uses. Given the low density of employment characteristic of industrial uses, there is limited opportunity for job growth. It is expected that commercial uses would continue to expand in these districts following a pattern of increasing market trends for entertainment and eating establishments in Long Island City. The Proposed Actions would provide additional space for a range of commercial and community facility uses to accommodate the demands of residential population and business growth while maintaining the area's cultural economy, including commercial and light manufacturing job growth within the Long Island IBZ. As detailed in Chapter 3 of the FEIS, current listings for available industrial space within the

study area and more broadly within the Long Island City IBZ suggest that potentially displaced businesses unable to afford rent increases could find comparable spaces to relocate within their business trade areas.

Comment 151: This rezoning will drive up our rent and drive away the artists and small businesses that make this neighborhood a place to both live and work. (Chan_BWB_034)

Response 151: Comment noted. Chapter 3, "Socioeconomic Conditions," assesses the potential effects of the Proposed Actions from indirect business displacement due to increased rents.

Comment 152: The viability of small manufacturers, makers, and creators are absolutely threatened. There is a promise that by building more this will bring rents down. But that has not historically been the case in the City's fastest growing neighborhood. And were that promise to become reality it would only be in the future at the expense of pressure on our existing businesses. The impact applies to mom and pop delis, dry cleaners, restaurants, artists, musicians, and many more. These businesses help the community to thrive and be the interesting mixed-use destination for which we are known. (Greenberg_040).

There is no demand for more office buildings, yet this is what the plan offers. Queens has a 13 percent office vacancy rate vs an industrial vacancy rate of just 5 percent, but the plan will make it harder for industrial businesses to thrive in LIC and will encourage the development of more high-end office properties that will remain vacant or end up having to be publicly subsidized while working artists and low-rent businesses are priced out. (Wolf-Powers_WQCLT_052)

Response 152: As detailed in *CEQR Technical Manual* Chapter 5, Section 332.3, the objective of the indirect business displacement analysis is to determine whether a project may introduce trends that make it difficult for those businesses that are essential to the local economy (as defined in Section 331.3) to remain in the area. The purpose of the preliminary assessment is to determine whether a project has potential to introduce such a trend. If this is the case, a more detailed assessment may be appropriate. As detailed in Chapter 3 of the DEIS/FEIS, the area is already experiencing a trend of industrial use turnover with the introduction of residential, office, and other types of retail uses. Many businesses are restricted from expanding offerings in response to the growing

residential population directly to the north and the east. In the absence of the Proposed Actions, the Project Area's manufacturing districts would continue to be dominated by a range of industrial and commercial uses. Given the low density of employment characteristic of industrial uses, there is limited opportunity for job growth. It is expected that commercial uses would continue to expand in these districts following a pattern of increasing market trends for entertainment and eating establishments in Long Island City. The Proposed Actions would provide additional space for a range of commercial and community facility uses to accommodate the demands of residential population and business growth while maintaining the area's cultural economy, including commercial and light manufacturing job growth within the Long Island IBZ. As detailed in Chapter 3 of the FEIS, current listings for available industrial space within the study area and more broadly within the Long Island City IBZ suggest that potentially displaced businesses unable to afford rent increases could find comparable spaces to relocate within their business trade areas.

Comment 153: THE DEIS does not speak mitigation of commercial displacement effects. (Wolf-Powers_WQCLT_052)

Response 153: Following *CEQR Technical Manual* guidelines, the analyses of direct and indirect business displacement in Chapter 3, "Socioeconomic Conditions," do not find that the Proposed Actions would result in significant adverse impacts warranting mitigation.

INDIRECT RESIDENTIAL DISPLACEMENT

Comment 154: The DEIS admits that 11.2 percent of residents in Subarea A—which includes Queensbridge and Ravenswood—are low-income renters in unprotected housing. That's double the 5 percent CEQR threshold that triggers a significant impact. Yet the DEIS claims no risk of displacement because some new units are affordable. This ignores how 9,676 of 14,699 new units are market-rate and target households making over $200,000/year. With local rents already surging, this plan will accelerate gentrification and force out vulnerable residents. CEQR requires mitigation or alternatives—not speculative claims about trickle-down affordability. (LICC-HPCC_001)

Response 154: According to the *CEQR Technical Manual*, if the vulnerable population potentially subject to indirect displacement exceeds 5

percent of the subarea population, the Proposed Actions may result in a significant change in the socioeconomic character of the subarea and a potential significant adverse impact may occur. However, as also noted in the *CEQR Technical Manual*, if it is determined that a project, because of its mixed income composition, would not cause drastic changes in the real estate market, it may not affect rents for some or all of the existing vulnerable units.

As detailed in Chapter 3, Section D of the DEIS, while those potentially vulnerable to indirect displacement do not include NYCHA residents, the 11.2 percent estimate of low-income renters in unprotected housing is influenced by the presence of over 5,300 NYCHA DUs in Subarea A. The vulnerable population estimates rely on data from the CHAS (Comprehensive Housing Affordability Strategy) which is provided by HUD. This dataset is based on custom tabulations from the American Community Survey (ACS) and is most recently available from the 2017-2021 ACS 5-year estimates. This CHAS data estimates that 73 percent of renter households in Subarea A are low-income households. The 73 percent figure is applied to the current year estimate of renter-occupied housing units in the subarea to determine how many of these current-year housing units are occupied by low-income households. This approach assumes that the proportion of low-income households in newly developed units since the 2017–2021 period would reflect similar patterns observed in existing housing conditions at the time of estimation. This is an extremely conservative assumption for two reasons:

Public Housing Concentration: Subarea A includes 5,313 NYCHA units (Queensbridge North/South and Ravenswood Houses). Under CEQR, populations vulnerable to indirect residential displacement include renters living in privately held units unprotected by rent control, rent stabilization, or other government regulations restricting rents, and whose income or poverty status may not support substantial rent increases. The large number of NYCHA units present in Subarea A are not considered vulnerable to displacement. However, these units are included in the calculation of CHAS data, which disproportionately influences income statistics and inflates the count of low-income households in unprotected housing. If the NYCHA DUs were to be removed from consideration in the CHAS data, the rate of low-income renters in the subarea would be approximately 52 percent. If the share of low-income renter households used in the calculations of vulnerable population were adjusted to this 52

percent, the estimated potentially vulnerable population in unprotected housing in Subarea A would drop to 3 percent.

Recent Development: Since 2020, the socioeconomic study area has seen 6,587 net residential units, primarily market-rate, with limited affordable housing. These changes, not reflected in the CHAS data, have significantly altered the rental landscape (see Table 3-5 in Chapter 3 of the DEIS/FEIS).

Absent the Proposed Actions, the existing zoning will continue to produce substantially less housing than surrounding areas with no mechanism to mandate permanent affordable housing. While the establishment of the LIC Special District in 2001 spurred significant development in the last two decades, the Project Area was largely omitted. Given the high rental housing costs in the study area, it is expected that most low-income renters in the subareas reside in protected rental units and would not be vulnerable to indirect residential displacement because of the Proposed Actions. The Proposed Actions are expected to introduce more housing supply and more affordable housing than in the Future without the Proposed Actions, potentially slowing trends of increasing rents and maintaining a more diverse mix of incomes within the subareas as compared to the No Action condition.

Comment 155: Market-rate rents in the rezoning area already average $5,399 for a 2BR—well above what local households can afford. The DEIS claims new development will “stabilize” prices, but its own data shows market-rate renters under the plan will earn over $200,000/year. With 9,676 new market-rate units, surrounding landlords will raise rents in anticipation. Low-income tenants in unprotected units are already rent-burdened. CEQR requires mitigation for price pressures caused by rezonings. The DEIS must provide rent stabilization tools, enforce tenant protections, or propose a rezoning alternative with deeper affordability. (LICC-HPCC_001)

Response 155: As noted by the comment and as detailed in Chapter 3, “Socioeconomics Conditions,” of the DEIS, market-rate units are already not affordable to low-income renters, creating displacement pressure irrespective of the Proposed Actions. The Proposed Actions would facilitate the addition of new, permanently affordable housing units in the subarea and nearby, which could slow this trend and would serve to maintain a wider range of household incomes over the long term as compared to the No Action condition. The mixed-income composition of residents

introduced to and near the subarea as a result of the Proposed Actions would not create or accelerate a trend of increasing rents such that all the potentially vulnerable population would be displaced. The application of MIH to the Project Area in the With Action condition would result in the creation of up to 803 permanently affordable, income-restricted units in Subarea A. Additionally, Subarea B will see the creation of up to 3,743 permanently affordable units in the With Action condition.

Comment 156: Hunters Point is a mixed community constantly in flux not the wealthy haven you suggest it is. (Dodes-Callahan_CL_023)

Response 156: Comment noted. Chapter 3, "Socioeconomic Conditions," of the EIS presents the average and median household income estimates from the 2006-2010 and 2018-2022 American Community Survey (ACS) five-year data, and the household income distribution from 2018-2022 ACS five-year data for a subarea (Subarea B) that includes Hunters Point.

COMMUNITY FACILITIES AND SERVICES

SCHOOLS

Comment 157: The DEIS repeatedly crosses clear CEQR thresholds: over 100 percent school utilization plus 1,300 students = significant impact; over 5 percent library demand growth = significant impact; child care deficit + 27.3 percent utilization increase = significant impact. Yet the DEIS treats each one as a future planning issue, not a present problem. CEQR law exists to stop this kind of speculative, underplanned growth. If critical services are not guaranteed up front, this project should not be certified. The DEIS must be rewritten to reflect the full scope of these impacts and provide real remedies. (LICC-HPCC_001)

Response 157: As described in Chapter 4, "Community Services and Services," of the DEIS, under the Proposed Actions, in Subdistrict 3/CSD 30, elementary school utilization would exceed 100 percent and the Proposed Actions would generate 100 or more students past the 100 percent utilization rate. Therefore, the Proposed Actions would result in a significant adverse impact to elementary schools in Subdistrict 3/CSD 30 pursuant to the guidance of the *CEQR Technical Manual*. Potential measures to address the significant adverse impact are discussed in Chapter 22, "Mitigation."

Comment 158: As a local small business owner and expecting mom living in the Court Square area, I am really hoping to see more public school seats and green spaces come online for my growing family and our children. (Zhu_012)

Response 158: Comment noted.

Comment 159: Building new schools: SCA is currently in discussions about the potential construction of six schools, including one high school, one middle school, and four elementary schools. However, these discussions are slow moving, and SCA has yet to reach a signed agreement with any property owner. Before the City Council vote, we need signed MOUs and capital investment commitments for the construction of all six schools to ensure that they are not just announced, but actually built in our district. (Won_NYCC_051)

Response 159: Comment noted. Potential MOUs are beyond the purview of the Proposed Actions and, as a result, not included in the environmental review.

OPEN SPACE

Comment 160: Offering the minimally required open space while more than tripling the existing population of residents and workers is indefensible, and deprives the City of enjoyment of the last remaining continuous stretch of waterfront along the East River. (LICC-HPCC_001)

The green spaces are not commensurate to the growth you are projecting. (Dodes-Callahan_CL_023)

The amount of new open space included in this plan is minimal for development of this scale. In addition to the new waterfront space, the plan should at least include a new city park comparable to Murray Playground. (Ort_045)

While I support the goal of creating more affordable housing in LIC, I'm very concerned about the lack of new usable public open space in the proposed plan. (Hunter_033)

Response 160: As indicated in Chapter 5, "Open Space," of the DEIS, there would be a significant adverse impact to open space in the residential study area. However, the Proposed Actions would result in benefits associated with the potential creation of up to 6 acres (including potential voluntary open space) of new publicly accessible waterfront open spaces at six RWCDS projected development sites in the Project Area (Projected Development Sites 63, 64, 65,

67, 69, and 71). It would introduce a new shore public walkway, supplemental public access areas, upland connections, and visual corridors providing access to Anable Basin from surrounding neighborhoods. In addition to the new open space that would be required by the WAP, approximately 1.5 acres of open space could potentially be developed on these projected development sites in exchange for floor area bonuses as a result of the Proposed Actions.

Comment 161: The DEIS acknowledges that overcrowding at the ferry terminal will force commuter lines to spill into Gantry Plaza State Park's public esplanade—compromising one of the few public waterfront parks in the area. While it calls this "negligible," this outcome robs residents of public space to serve regional commuters. CEQR requires preserving the usability of parks for the community. Instead, the plan privatizes public open space for infrastructure overflow. The DEIS must include design changes or queueing strategies that preserve full public access to Gantry Plaza during peak hours. (LICC-HPCC_001)

Response 161: Gantry Plaza State Park is a large waterfront resource. The affected area of the ferry terminal represents a small portion of the park. Of the almost 12 acres of open space within the park, a substantial amount of esplanade and active zones would remain free for residents and visitors to utilize.

Comment 162: The DEIS claims "walk to park" access is sufficient—ignoring that much of the study area includes hard-to-cross highways, superblocks, and non-contiguous street grids. It uses straight-line distance to claim people are within walking range, but real-world access is limited. CEQR encourages considering "connectivity" and physical barriers, not just distance. The DEIS must reevaluate access by factoring in street-level conditions, NYCHA barriers, and pedestrian safety. Failure to do so misrepresents access equity and ignores OneNYC and CEQR's own equity goals. (LICC-HPCC_001)

Response 162: As defined by the *CEQR Technical Manual*, the Walk to a Park assessment requires a graphic, which has been provided in the DEIS, that shows the project area compared to Walk to a Park Service Areas to demonstrate if the project is outside or inside the service areas.

Comment 163: As the plan moves forward, we strongly support the creation of new public open spaces, which are urgently needed. In fact, our college is collaborating with the Department of Transportation to develop the LaGuardia Community Greenway, soon to feature one of the city's largest street murals. Open spaces play a vital role in promoting mental and physical well-being by providing places for recreation. (Adams_LCC_021)

Response 163: Comment noted.

Comment 164: Potential privately owned spaces to be built under voluntary bonus provisions will further increase the already very high proposed density of the area and may not happen at all or serve the blocks with the greatest need. (Hunter_033)

Response 164: As described in the DEIS, bonus floor area would only be provided in exchange for publicly accessible open space. These provisions are targeted at areas (waterfront parcels, the LIC core) where open space has been identified as most needed.

Comment 165: For adults, and especially for seniors, there will be little opportunity for active and passive recreation close by, or the public places that promote neighborhood interaction and community. (Hunter_033)

Response 165: The modified WAP would facilitate the potential creation of approximately 4 acres of publicly accessible waterfront open space, connecting Gantry State Park to Queensbridge Park, and connecting the waterfront with upland neighborhoods. The new open spaces are expected to include passive recreational amenities that seniors and older adults could utilize. As noted in Chapter 5, “Opens Space,” in the DEIS, the entire Project Area is within a Walk-to-a-Park service area meaning that Project Area residents live within walking distance to a park. The residential study area open spaces include a wide variety of actively programmed spaces appropriate for all age groups within the study area, including children, teenagers, adults, and seniors. In the future with the Proposed Actions, at least 4.38 acres of new publicly accessible open space, approximately 80 percent (3.51 acres) of which is estimated to be for passive recreation and 20 percent (0.88 acres) of which would for active recreation would be added to the Project Area. This new open space would introduce a new shore public walkway, supplemental public access areas, upland connections, and visual corridors providing access to Anable Basin from surrounding neighborhoods. The shore public walkway would connect to Gantry Plaza State Park to the south

and extend up to 44th Avenue to the north, but could potentially connect to Queensbridge Park further to the north, which would create a continuous publicly accessible waterfront through the Project Area if fully implemented. This additional open space, and connectivity that it would provide, would promote neighborhood interaction in the study area.

Comment 166: The Baby Park is adjacent to the Queensbridge Houses, the Largest public housing development in North America. Indeed, there are no major bridges in NYC with public land beneath it that are allowed for these types of uses. As Council Member Julie Won has stated, the OneLIC Plan must include the full restoration of the entire Queensbridge Baby Park which includes the publicly owned lots that are being used for city agency operations. By converting the Parks Department and Transportation Department-owned sites to parks and plazas, OneLIC can add as much as 8.5 acres of public space to LIC. This includes a total of 15 city-owned lots. (Taylor_QOTC_117)

Response 166: Comment noted. The Queensbridge Baby Park Reconstruction project (north of Queensboro Bridge between Venon Boulevard and 21st Street) currently underway is accounted for in the DEIS.

SHADOWS

Comment 167: The DEIS admits Gordon Triangle, a publicly owned park, will be in shadow for nearly 11 hours a day in spring and summer—yet still claims the impact is acceptable. CEQR considers anything over four hours on planted open space potentially significant. This is a clear violation of CEQR thresholds for sunlight-sensitive park use and vegetation. The DEIS must explain how this meets CEQR standards when the Triangle receives nearly full-day incremental shadow during the growing season, effectively rendering it unusable and potentially killing plant life. If no mitigation is possible, the site plan must be revised to reduce building mass. (LICC-HPCC_001)

Response 167: Chapter 6, “Shadows,” of the DEIS concluded that the Proposed Actions would cause significant adverse impacts to both the vegetation and the recreational use of the Gordon Triangle pursuant to the guidance of the *CEQR Technical Manual*. Therefore, as described in Chapter 21, “Mitigation,” the City is required to explore potential mitigation measures in coordination with NYC Parks to reduce or eliminate the shadow impacts on this

space. Such measures could include relocating sunlight-sensitive features within the open space to avoid sunlight loss; relocating, replacing, or monitoring vegetation for a set period of time; undertaking additional maintenance to reduce the likelihood of species loss; or providing for replacement facilities on another nearby site. Other potential mitigation strategies include the redesign or reorientation of the open space to provide for replacement facilities, vegetation, or other features, and modifications to the height, shape, size, or orientation of a proposed development that creates the significant adverse shadow impact.

Comment 168: Shadows will fall on Anable Basin for up to 10 hours during key growing and spawning seasons. Yet the DEIS claims this will have no impact on aquatic life based on generalized literature and "rapid current" assumptions. There is no site-specific data on water turbidity, algae productivity, or fish behavior in the Basin. CEQR requires localized impact analysis when natural habitats are affected. The DEIS must redo this section using real-world observations, light modeling at the water surface, and seasonal ecological sensitivity— especially given this location's proximity to new ferry and building infrastructure. (LICC-HPCC_001)

Response 168: Chapter 6, "Shadows," of the DEIS concluded that while the extent and duration of new shadow on the surface of the Basin would be substantial at times, most of the Basin would continue to receive at minimum several hours of direct sunlight in the spring, summer, and fall, and even the eastern end would receive at least two and a half hours of direct sun in these months. The DEIS noted that primary productivity in the study area is generated primarily from phytoplankton, and light requirements for phytoplankton are low and the reduction in direct sunlight in the shadow footprint would have a negligible impact on phytoplankton populations. With regard to fish, the Basin is a small extension of the East River with no upstream water source, and therefore does not serve as a migratory pathway. Fish are able to avoid areas with low light levels, and Anable Basin is expected to be used only intermittently as a foraging habitat. When considered with the abundance of foraging habitat available in the East River, any temporary reduction of suitable foraging habitat in the Anable Basin would not result in significant adverse impacts to the fish species of the Hudson-Raritan Estuary. As further noted in the DEIS, spawning behavior for some fish species is affected by light intensity and could be affected by project-generated reduced light levels in

Anable Basin. As discussed in Chapter 9 of the DEIS, "Natural Resources," the potential loss of some portion of the Basin to spawning would represent a de minimis reduction of spawning habitat when compared to the amount of spawning habitat for all potentially spawning species available within the Hudson-Raritan Estuary. Other species that could potentially spawn in the study area, including winter flounder and windowpane flounder, are nighttime spawners and do not use high-light intensity as a spawning cue. Therefore, shadows cast by buildings resulting from the Proposed Actions would have no impact on their spawning behavior.

Comment 169: The DEIS acknowledges that the 44th Drive Pier—a rare publicly-owned waterfront open space—would be under new shadows for up to five hours daily in spring and summer. This pier is already wind-exposed and lacks vegetation, making sunlight essential for public comfort. CEQR guidelines emphasize usability impacts—not just plant health. Extended morning shadows will make this space cold, uninviting, and underused. This is a significant adverse impact. The DEIS must provide either meaningful mitigation (like pier redesign or offsetting sunny space) or a reduced bulk alternative. It cannot simply write this off as a trade-off. (LICC-HPCC_001)

Response 169: The 44th Drive Pier contains rows of benches and provides views of the East River and Manhattan but no plantings or other vegetation. The DEIS concluded that incremental shadow resulting from the Proposed Actions would cause significant adverse impacts to the recreational use of the 44th Drive Pier, due to substantial morning shadows, despite the fact that the Pier would remain in sun throughout the afternoon in all seasons pursuant to the guidance of the *CEQR Technical Manual*. Therefore, as described in Chapter 21, "Mitigation," the City is required to explore potential mitigation measures to reduce or eliminate the shadow impacts on this space. Such measures could include providing for replacement facilities on another nearby site or modifying to the height, shape, size, or orientation of a proposed development to reduce the significant adverse shadow impact.

Comment 170: The DEIS admits new towers will cast shadows on the East River and Anable Basin but claims "no significant impact" on aquatic biota. No quantitative analysis is provided. Light is critical for phytoplankton, which form the base of the aquatic food chain. Shaded areas reduce photosynthesis, alter fish behavior, and

disrupt foraging. CEQR requires analysis when shading could impact habitat function. The DEIS must provide mapped shadow extents, duration models, and light attenuation impacts on fish and plant life. Its current dismissal of these impacts is unsubstantiated and fails CEQR standards. (LICC-HPCC_001)

Response 170: As stated in Chapter 9 "Natural Resources" of the DEIS, primary productivity within the aquatic study area is generated mainly from phytoplankton. SAV are not present within the East River and have not been observed within the study area. Light requirements for phytoplankton are low, and the reduction in light within the shadow footprint would have a negligible impact on phytoplankton populations. In addition, currents in the East River in the vicinity of the Development Sites are swift (2.5-3.0 knots) and would quickly carry any light-dependent phytoplankton through the incremental shadows to areas with full light exposure, limiting their exposure to shaded conditions to a relatively short period of time.

Chapter 9 "Natural Resources," of the DEIS also explains that changes in behavior and habitat use for fish are typically observed with significant shading associated with piers and other overwater structures. Shadows, such as those cast by buildings along a shoreline, result in less reduction in light reaching the water surface than shading from overwater structures, and affect different areas over the course of the day, further reducing the potential to affect aquatic biota. Some fish would be expected to avoid shaded areas but would have ample areas of the East River available for foraging and to maintain anadromous fish migration. For this reason, incremental shadows resulting from the Proposed Actions would not have a significant effect on fish migration, movement or spawning in the East River.

In addition to the information found in Chapter 9, Chapter 6 "Shadows" of the DEIS explains that, in the East River, areas of new shadow would move over the course of the day, not falling on one particular area for long. The areas of the East River that would receive the longest durations of new shadow would continue to receive ample sunlight in the midday and afternoon, as there are no structures to the west. Mapped shadow extents, at different points in the year, are shown in Figures 6-2 through 6-5 of the DEIS. A more detailed analysis of shadows associated with proposed projects can be found in Figures 6-6 through 6-79 of the DEIS.

Comment 171: The DEIS routinely downplays winter shadows, claiming they fall during low-usage times. But in dense urban areas like LIC, even winter morning sun is essential for warming up open spaces and creating perceived safety. Parks like Queensbridge, Court Square, and Gantry Plaza that are publicly-owned rely on morning sun for winter usability. CEQR does not allow shadow impacts to be dismissed based on seasonal assumptions alone—especially when they affect disadvantaged communities. The DEIS must include human-centric use data showing real seasonal park activity and disclose whether cumulative shadowing makes spaces unsafe or uninviting in colder months. (LICC-HPCC_001)

Response 171: The shadows assessment in the EIS was performed pursuant to the guidance of the *CEQR Technical Manual*. The DEIS referred to low usage in winter in the discussions of four of the 35 open spaces that would receive incremental shadows. Of these four, two are across the East River in Manhattan and one is on Roosevelt Island; the one-block 12th Street pedestrian plaza was the only Long Island City space. With regard to Queensbridge Park and Gantry Plaza State Park, the limited extent and duration of incremental shadow and continued availability of ample sunlit areas in winter led to the conclusion that these parks would not be significantly affected in winter. Court Square Park would not receive any incremental shadow in winter.

Comment 172: The DEIS repeatedly claims that “only three” parks face significant shadow impacts—but dozens of other sites see 2–4 hours of shadow loss, which CEQR flags as meaningful for vegetation and user comfort. Many of these spaces are small, like triangle plazas or Greenstreets, where partial shade becomes total darkness. By narrowly interpreting CEQR’s “significant impact” threshold, the DEIS minimizes the real-world public experience of loss. The analysis should acknowledge these as qualitative impacts, especially in areas with limited existing public open space. Ignoring these harms undermines public trust and fails to uphold CEQR’s intent. (LICC-HPCC_001)

Response 172: The DEIS quantified and disclosed the incremental shadows on each park, plaza, and Greenstreets median that could be affected by the Reasonable Worst Case Development Scenario in terms of time duration and areal coverage, and applied the criteria set forth on the *CEQR Technical Manual* to evaluate the sensitivity of the resource to shadows and the degree and nature of the incremental shadows’ impacts in each case. In three cases the adverse impact was identified as significant, requiring mitigation efforts.

Comment 173: The DEIS concludes that new development on projected development sites would cast incremental shadows that would have significant adverse impacts on three open space resources. In the case of the 44th Drive Pier, this finding is solely based on new shadows that would be cast in the morning during the spring, summer and fall, as the pier would be fully in sunlight during the afternoon in all time periods. The DEIS does not provide an explanation as to why this morning shade would create a significant adverse impact on the utility of the pier, which contains benches and no vegetation. In our opinion, and as increasingly recognized by other municipalities,1 the addition of shade to open spaces is not always an adverse impact, particularly in warmer months. We respectfully ask the City Planning Commission to further consider in the FEIS whether the additional shade has a significant adverse impact as average temperatures continue to increase and the City experiences more frequent heat. (Hare_Plaxall_055)

Response 173: As documented in the DEIS, the 44th Drive Pier would be partially or entirely in new shadows for four to five hours in the mornings throughout the spring, summer, and fall, and two and a half hours in the winter. Based on the impact determination criteria set forth in the *CEQR Technical Manual*, as well as consultation with NYC Parks, this substantial duration and coverage of new shadow on the Pier would significantly impact its usability as a recreational resource. With regard to the general effects of shading in the warmer months in light of the increasing temperatures experienced in recent years in the City, comment noted.

Comment 174: The plan will allow sun blocking 100-story luxury towers to be built just adjacent to Queensbridge. (Brooks_LICC_WQCLT_059)

The proposed development would literally leave Queensbridge houses in the shadows (Chaise_RRA_063)

Shorter buildings with setbacks and terraces and facade articulation to minimize the extent and duration of new shadows that are cast on sensitive receptors nearby such as the planted area and solar panels on the 6--story Queensbridge South campus. (CB1_Queens_150)

Response 174: The Queensbridge Houses complex was included as sunlight-sensitive resources in the shadows analysis in the DEIS. The analysis concluded that new shadows would move across portions of the complex throughout the mornings in all seasons, and to a lesser extent in the afternoons in fall, winter, and early spring for

about two and a half hours, However, with the exception of the first hour of the winter date, the new shadow would be limited in size relative to the overall complex and there would continue to be large areas of sunlit landscapes, walks, and recreation areas available, and therefore the DEIS concluded that the new shadows would not cause significant adverse shadow impacts to the complex. Queensbridge Park was also included as a sunlight-sensitive resource in the analysis. The DEIS showed that new shadows would fall on parts of the park in winter, while other parts would remain in sun, and would reach the park only minimally on the fall and early spring representative date and not at all on the late spring and summer dates. The DEIS concluded that given their limited duration and coverage, the new shadows would not significantly impact the park.

HISTORIC AND CULTURAL RESOURCES

Comment 175: While the DEIS catalogs architectural resources, it offers no discussion of cultural significance to the local community—particularly in areas like Hunters Point and Queensbridge. CEQR encourages the inclusion of intangible cultural heritage and neighborhood identity in the evaluation of historic resources. The DEIS treats historic buildings as isolated artifacts, not as part of a living cultural landscape. It must expand its scope to include community use, cultural memory, and public meaning of these spaces—especially in disadvantaged communities under threat of displacement. (LICC-HPCC_001)

Response 175: Chapter 7, "Historic and Cultural Resources," of the EIS presents an analysis of the potential for the Proposed Actions to result in significant adverse impacts pursuant to the guidance of the *CEQR Technical Manual*. As described in the *CEQR Technical Manual*, "Historic and cultural resources include both architectural and archaeological resources. Architectural resources generally include historically important buildings, structures, objects, sites, and districts. They may include bridges, canals, piers, wharves, and railroad transfer bridges that may be wholly or partially visible above ground. Archaeological resources are physical remains, usually subsurface, that may provide an understanding of the long period of Native American occupation in the area before the arrival of the Europeans (pre-contact), and the period when the Native American, Europeans, and people of African ancestry initially encountered each other (contact)." These resources have been identified and include resources identified as significant pursuant

to National Register Criterion A, consisting of those properties which are associated with events that have made a significant contribution to the broad patterns of history, such as with respect to community planning and development and social history. In addition, a field survey to identify potentially eligible architectural resources was undertaken by an architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for Architectural Historians (36 CFR Part 61 Appendix A).

Comment 176: The DEIS identifies at least 18 additional historic or potentially eligible buildings within 90 feet of proposed construction—but admits they are not protected under *TPPN #10/88*. These include Silvercup Bakery, the Tom Cat Bakery, and Jerome Perlstein's mid-century industrial works. The DEIS acknowledges they may be "adversely impacted," yet offers no binding construction protection plan. CEQR requires mitigation for construction-related vibration and physical damage to historic resources. Blanket statements about Building Code protections are insufficient and unenforceable. Each resource deserves a site-specific Construction Protection Plan and monitoring strategy. (LICC-HPCC_001)

Response 176: As discussed in Chapter 7, "Historic and Cultural Resources," and Chapter 21, "Mitigation," since these resources are not S/NR-listed or designated NYCLs or New York City Historic Districts, they are not afforded special protections under TPPN #10/88. Since the projected and potential development sites within 90 feet of these resources are not City-owned and are not anticipated to be developed in accordance with City disposition or development agreements, there is no mechanism to require the implementation of TPPN #10/88 or preparation of a Construction Protection Plan. Additional protective measures afforded under TPPN #10/88 would only become applicable if the resources were listed on the S/NR or designated as NYCLs or NYCHDs in the future prior to the initiation of construction.

DIRECT EFFECTS

Comment 177: The DEIS admits the rezoning will demolish five buildings deemed eligible for State and National Register listing, including the M. Henry Chernay, Jerome Perlstein, Walter Lippmann, and New York and Queens Electric Light & Power buildings. No design alternatives or preservation incentives are offered. CEQR mandates that significant adverse impacts must be minimized or

avoided. Demolishing five eligible structures for speculative development without exploring adaptive reuse or rezoning alternatives violates CEQR's mandate to consider reasonable alternatives and contradicts New York City's preservation goals. (LICC-HPCC_001)

Response 177: As described in Chapter 1, "Project Description," DCP is proposing the Proposed Actions in response to objectives and recommendations derived from many years of planning work in and around Long Island City by community members, elected officials, and City agencies, and through the City's on-going community engagement process, which was initiated in the fall of 2023. The Proposed Actions would support community goals, informed by engagement with Community Boards 1 and 2, elected officials, nonprofits, advocacy groups, residents, businesses, property owners, and various stakeholders. In order to assess the possible impacts of the Proposed Actions, a Reasonable Worst Case Development Scenario (RWCDS) was developed for the future with the Proposed Actions. As described in Chapter 1, "Project Description," the RWCDS projected development sites are considered more likely to be developed within the 10-year analysis period for the Proposed Actions (i.e., by the analysis year 2035) while RWCDS potential sites are considered less likely to be developed over the approximately 10-year analysis period. The selection of the development sites is based on a reasonable worst-case scenario, and development of these sites is assumed for a conservative analysis under CEQR but not mandated by the Proposed Actions. As described in Chapter 21, "Mitigation," the S/NR-eligible buildings located on sites identified as projected and potential development sites for the purposes of analysis of the Proposed Actions are privately owned, and could be demolished in the future without or with the proposed rezoning. An alternative that would avoid the direct impact on these resources was considered in the DEIS. As described in Chapter 22, "Alternatives," in order to entirely avoid this direct impact (potential demolition of architectural resources located on projected and potential development sites), this alternative would require that Projected Development Sites 40, 52, and 59 and Potential Development Site G be eliminated from rezoning under the proposed actions. However, these sites cannot be excluded on their own, as carving them out of the proposed zoning map would result in an irregular and impractical zoning map, leaving pockets of lower density manufacturing zoning in the middle of proposed higher density manufacturing and mixed-use districts. Moreover, it would reduce

the amount of housing, community facility, commercial, and manufacturing space permitted in the Project Area and would be less supportive of the goals and objectives of the Proposed Actions. It should be noted that none of the buildings that have been identified as potentially being demolished as part of the RWCDS are New York City Landmarks.

INDIRECT EFFECTS

Comment 178: The DEIS concedes that new towers—many up to 1,175 feet tall—will significantly alter the visual setting of low-scale landmarks like the New York Architectural Terra Cotta Works, Silvercup Bakery, and Queensbridge Houses. Yet it concludes there are no "significant adverse impacts" because the buildings "remain visible." This misinterprets CEQR's guidance, which requires evaluation of whether context, scale, and public view corridors are fundamentally compromised. The DEIS must model view corridors and demonstrate how these historic resources can retain cultural meaning in the shadow of ultra-dense high-rises. (LICC-HPCC_001)

Response 178: As stated on page 7-3 of Chapter 7, "Historic and Cultural Resources": "With Action development would alter the setting of many known and potential architectural resources in the Project Area. This alteration to the setting of resources in the Project Area would be most pronounced and would be identified as significantly adverse where the existing setting is very low-scale (i.e., less than 3 stories in height), including much of Industrial Subarea 1, and where With Action development on projected and potential development sites could be more than 100 feet taller than adjacent architectural resources and buildings in the surrounding area. In contrast, the architectural resources within Inland Subarea 1 and Inland Subarea 2 already exist within a setting that includes dense, tall development as well as views to additional dense, tall development in the surrounding area; therefore, the alteration to the setting of resources in these subareas is not identified as significantly adverse. The context of the resources within and adjacent to the Waterfront Subarea would notably change in the With Action condition, with new high-rise, mixed-use buildings along the East River waterfront that would have no maximum height limit." Therefore, the DEIS disclosed the potential indirect significant adverse impacts on low-scale architectural resources, such as the New York Architectural Terra Cotta Works located in the Waterfront Subarea and the Silvercup Bakery in Industrial

Subarea 1. With respect to the Queensbridge Houses, this complex is located north of the Queensboro Bridge, a physical and visual barrier, from the bulk of the rezoning area to the south. Across 21st Street to the east it is anticipated that tall buildings would be developed on a number of projected and potential development sites. However, as stated in Chapter 7 of the DEIS, the Queensbridge Houses would remain visible in views along 21st Street. Furthermore, 21st Street is a relatively wide street that carries four lanes of traffic in addition to two parking lanes, and there is no meaningful relationship between the Queensbridge Houses and the existing developments on the projected and potential development sites on the east side of 21st Street, which include a vacant site, a recently constructed 8-story warehouse building, and a 3-story factory building. Chapter 8, "Urban Design and Visual Resources," of the DEIS illustrates multiple view corridors in existing, No Action, and With Action conditions, including view corridors that include architectural resources, such as the view corridor of 21st Street (see Figure 8-74 of the DEIS).

Comment 179: New towers along Anable Basin will obstruct or overshadow views of multiple S/NR-listed landmarks on Roosevelt Island—especially the Queensboro Bridge, Strecker Memorial Laboratory, and the Smallpox Hospital. Yet the DEIS fails to assess visual intrusion from the Manhattan side or eastbound Queensbridge views. CEQR requires analysis of viewshed impacts when a historic landscape or structure may be visually dominated. The absence of modeled views from Roosevelt Island or the bridge approach violates CEQR's standards for contextual impact review. (LICC-HPCC_001)

Response 179: The DEIS was prepared consistent with the Final Scope of Work, which identified a 400-foot study area for historic resources and a ¼-mile study area for urban design and visual resources. Views from Manhattan and Roosevelt Island are discussed in Chapter 8, "Urban Design and Visual Resources;" see pages 8-40 and 8-57. As described in Chapter 7, the mapping of new public streets in Block 488 and 489 along the East River waterfront and the creation of new required shore public walkways on Projected Development Sites 63, 64, 65, 67, 69, and 71 would be anticipated to create new viewpoints along the waterfront toward architectural resources in the area, particularly the Queensboro Bridge and resources on the south side of Roosevelt Island, such as the former Strecker Memorial Laboratory and Smallpox Hospital buildings, both NYCLs and S/NR-listed. The With Action development also would

change elevated views from the bridge to the surrounding area with the addition of multiple high-rise towers along the East River waterfront. These elevated views already include high-rise development in close proximity to the bridge and the high-rise development along the river in Hunters Point.

URBAN DESIGN AND VISUAL RESOURCES

Comment 180: Proposed residential towers, reaching 1,000'+ (over 100 stories) or even unlimited heights, are private structures that will create a "wall of supertalls" and block stunning views of Manhattan from the entire upland neighborhood and as far away as eastern Queens. (LICC-HPCC_001)

Response 180: Following the *CEQR Technical Manual* methodology for an urban design assessment, the DEIS identified visual resources in the Project Area and secondary study area and the "view corridors within the study area from which such resources are publicly viewable." Within the Project Area, the DEIS identified views of the Manhattan skyline as a visual resource that could be seen from certain locations in the Waterfront Subarea, Industrial Subarea 1, Inland Subarea 3, Inland Subarea 4, and to a limited extent from Inland Subarea 1. The DEIS also noted that the Manhattan skyline could be seen from Queensbridge Park and the Ravenswood, Downtown Long Island City, and the Hunters Point portions of the secondary study area. Except from the 44th Drive Pier, existing views of the Manhattan skyline from the Waterfront Subarea are partially blocked by existing buildings and fencing on the west side of Vernon Boulevard. From the other subareas and the secondary study area, the Manhattan skyline is seen in the distance in existing views beyond intervening buildings, and views are variable.

In assessing impacts, the DEIS followed the *CEQR Technical Manual* guideline that for visual resources, the key "considerations in the assessment of the significance of a visual resource impact may include whether the project obstructs important visual resources and whether such obstruction would be permanent, seasonal, or temporary; how many viewers would be affected; whether the view is unique or do similar views exist; or whether the visual resource can be seen from many other locations." First, the DEIS urban design analysis concluded that, while views of the Midtown Manhattan skyline would be blocked or partially obscured from some locations within the Project Area and secondary study area, some of those views would be blocked in the No Action

condition, notably views west on Vernon Boulevard over the vacant parcel between the DOE Building and Con Edison Learning Center. The DEIS further concluded that the extent that views would be obscured in the With Action condition would be dependent on exact location. As shown on Figures 8-56, 8-59, 8-60, 8-62, 8-64, and 8-66 in the DEIS, the view corridors on 46th Avenue, 44th Drive, 44th Avenue, 21st Street, 43rd Road, and 45th Road, would continue to provide partial views of the Manhattan skyline although they would be developed with new buildings. Views from Queensbridge Park and the Queens West portion of Hunters Point would not be blocked by the Proposed Actions. Overall, the DEIS concluded that the Proposed Actions would result in beneficial effects on views through the creation of a network of waterfront open space that would connect the entire East River shoreline within the Waterfront Subarea. Within the subarea, the Proposed Actions would improve physical access to the waterfront and maintain visual access along key locations. The proposed east-west upland connections along with the proposed mapped street would maintain view corridors from Vernon Boulevard to the East River and Anable Basin, with views of the Midtown Manhattan skyline in the distance. The proposed upland connections to the shore public walkway around Anable Basin would provide new views to Anable Basin. From the proposed shore public walkway, there would be immediate views of the East River and new views up and down the East River that include Roosevelt Island, the Manhattan skyline, and Queensboro Bridge.

Comment 181: The DEIS admits that towers up to 1,175 feet tall would replace existing low-rise buildings, drastically altering views of the East River and Midtown skyline. This blocks rare view corridors from Vernon Blvd, which CEQR considers significant visual impacts requiring mitigation or alternatives. Yet, the DEIS claims “no significant impact” without modeling the full extent of visual disruption or offering mitigation. This blatant dismissal of CEQR guidance demands detailed visual simulations, alternatives with reduced massing, and an honest assessment of view corridor loss. (LICC-HPCC_001)

Response 181: Vernon Boulevard is not a view corridor that provides views to the East River and the Midtown skyline. Rather, where views of those visual resources can be seen from Vernon Boulevard, they are seen in the background of buildings along the west side of Vernon Boulevard or over vacant lots through fences. Some of those views would be blocked, as concluded in the DEIS; notably, views west

on Vernon Boulevard over the vacant parcel between the DOE Building and Con Edison Learning Center would be blocked in the No Action condition by as-of-right development on Projected Development Site 69. While views west on 44th Drive, which is a view corridor to the East River, would be lined by new buildings, those new buildings would not obstruct visual access to the East River, Roosevelt Island, and portions of the Midtown Manhattan skyline (as shown on Figure 8-59 in the DEIS). Additionally, as shown on Figures 8-56, 8-59, 8-60, 8-62, 8-64, and 8-66 in the DEIS, the view corridors on 46th Avenue, 44th Drive, 44th Avenue, 21st Street, 43rd Road, and 45th Road, would continue to provide partial views of the Manhattan skyline although they would be developed with new buildings. Overall, the DEIS concluded that the proposed east-west upland connections at Queens Plaza South, 43rd Road, between 43rd Road and 44th Avenue, 44th Avenue, 45th Road, the proposed visual corridor at 45th Avenue, along with the proposed mapped street connecting 44th Avenue and 44th Drive, would maintain view corridors from Vernon Boulevard to the East River, with views of the Midtown Manhattan skyline in the distance.

Comment 182: The DEIS dismisses any urban design impact to the character of Western Queens, despite major disruptions to the street wall, lot coverage, and scale of surrounding neighborhoods. According to CEQR, significant design impacts occur when scale or orientation alters historic approaches or street grids. This rezoning severs the visual and spatial continuity that defines Hunters Point. The absence of a mitigation framework and alternatives that preserve neighborhood form is a glaring oversight. (LICC-HPCC_001)

Response 182: The Proposed Actions would not alter the street grid through most of the Project Area, but the Proposed Actions would include City Map changes in the Waterfront Subarea and modifications to the Northern Hunters Point Waterfront Access Plan (WAP). As described in the DEIS, the modified WAP would specify the location of required shore public walkways, supplemental public access areas, upland connections, and visual corridors to ensure access to Anable Basin from surrounding neighborhoods and to address unique conditions along Anable Basin and the East River waterfront. The WAP would also modify requirements and standards for public access to expand the neighborhood's public space amenities, facilitate vibrant public spaces, and improve coastal resiliency and local ecology. The proposed changes to the City Map would rationalize the street network, create the

framework for a new open space along the East River, and enhance circulation along the waterfront. Overall, the proposed changes to the street grid would have beneficial effects on the urban design of the Project Area.

As described in the DEIS, the projected buildings developed throughout the Project Area would be taller than existing buildings, as well as the few as-of-right developments that are illustrated in the No Action condition, but they would be compatible with existing uses and complementary to the prevailing context. The proposed height and setback requirements would create consistent street walls and buildings massed with towers set back above mid- to high-rise bases. In addition, the projected mixed-use buildings in the Waterfront Subarea would step up in height from the Queens West development south of Anable Basin, the projected buildings in Inland Subarea 3 would provide transitional medium-scale buildings between the upland neighborhoods and the new large-scale buildings constructed around Anable Basin, and the projected tall mixed-use buildings in Inland Subarea 2 and Industrial Subarea 2 would be in keeping with the height and form of existing buildings in Inland Subarea 2 and Downtown Long Island City, located immediately to the east of the Project Area. The projected buildings would enhance the pedestrian experience by bringing new neighborhood-serving uses to the ground floor of new buildings. They would replace land that is either vacant, used for parking and storage areas (enclosed by chain-link fencing), or one- and two-story industrial and commercial buildings that lack urban design elements that make for a pedestrian friendly neighborhood.

Comment 183: The DEIS repeatedly asserts that 80+ story towers would be "compatible" with nearby developments like Queens West and Hunters Point South, but never substantiates this with height comparisons, sun/shadow diagrams, or pedestrian-level renderings. These blanket statements contradict CEQR's call for graphic evidence and spatial context to evaluate impact significance. Without comparative visuals or urban design metrics, these assertions remain vague and misleading, failing SEQR's standard for analytical rigor. (LICC-HPCC_001)

Response 183: Chapter 8, "Urban Design and Visual Resources," of the EIS presents an analysis of the Proposed Actions' effect on the public realm, consistent with the guidance of the *CEQR Technical Manual*. Pages 8-53, 8-55, and 8-56 in the DEIS provide height comparisons between proposed and existing buildings, and

Figures 8-55 to 8-75 in the DEIS include pedestrian-level renderings that compare existing, No Action, and With Action conditions.

Comment 184: The community's Vision Plan for Resiliency clearly calls for development that respects the East River hydrodynamics, improves crosstown connections, preserves historic Western Queens character, and protects rare views. Yet the DEIS proposes bulky towers that erase neighborhood-scale urban design, block visual and physical access, and sever historic alignments. The disconnect between community consensus and the proposed action demands an alternative scenario aligned with the Vision Plan's values—one that prioritizes resilience, equity, and contextual design. (LICC-HPCC_001)

Response 184: The urban design analysis in Chapter 8, "Urban Design and Visual Resources" concludes that projected developments would have base heights and building heights that respond to existing neighborhood contexts and account for existing street widths. The bulk regulations would facilitate built forms that are complementary to the prevailing context but that also accommodate the new uses at higher densities.

Comment 185: I believe it will allow towers almost as tall as the twin towers were! (Mungo_WQCLT_058)

Response 185: Chapter 8, "Urban Design and Visual Resources," of the EIS presents an analysis of the Proposed Actions' effect on the public realm, consistent with the guidance of the *CEQR Technical Manual*.

Comment 186: Shorter buildings with setbacks and terraces on Blocks 411 and 412 might also help limit obstructed views of the landmarked Queensborough Bridge for pedestrians and residents. (CB1_Queens_150)

Response 186: Comment noted. The Queensboro Bridge is and would remain visible in views along 21st, 22nd, and 23rd Streets (the streets adjacent to Blocks 411 and 412) in the future with the Proposed Actions.

PEDESTRIAN WIND CONDITIONS

Comment 187: By proposing buildings "substantially taller" than the neighborhood context, the project introduces canyon-like street walls that CEQR warns can worsen wind conditions and pedestrian safety. The DEIS fails to conduct any pedestrian wind impact analysis—despite acknowledging towers over 1,000 feet set along narrow streets. This violates CEQR guidance, which flags wind safety risks as material adverse impacts requiring modeling, mitigation strategies, and potential redesign. (LICC-HPCC_001)

Response 187: Comment noted. While the Proposed Actions would introduce taller buildings in proximity to water, it is not anticipated that they would result in a uniform street wall that could channelize downward wind pressure and, therefore, an analysis is not included in the EIS.

NATURAL RESOURCES

Comment 188: The DEIS downplays water quality impacts despite acknowledging that the East River remains impaired for PCBs, dissolved oxygen, and heavy metals. It assumes future development will reduce CSOs, but fails to consider sediment resuspension, shoreline contamination from bulkhead reconstruction, or ferry prop wash. It also ignores the impacts in Anable Basin, where water quality has been compromised over time by both the untreated discharges of legacy industries such as Paragon Paint and ongoing overflows from a CSO at 5th Street. (LICC-HPCC_001)

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 during demolition and cleanup, and added storm runoff both during construction and after the proposed development is completed. CEQR requires evaluating water body impairment in context—not assuming cleaner outcomes from more development. The DEIS must disclose expected sediment disturbance from pile driving or dredging, how contaminated materials will be handled, and whether fish consumption risks or aquatic habitat toxicity will worsen. (LICC-HPCC_001)

Response 188: The analysis in the EIS concludes that there would be no significant adverse natural resources impacts as a result of the Proposed Actions. As stated in Chapter 9 "Natural Resources," in the section on Aquatic Resources and Water Quality, construction,

including shoreline and bulkhead improvements, would be required to comply with the conditions of applicable U.S. Army Corps of Engineers (USACE) and New York State Department of Environmental Conservation (DEC) permits, as required. Erosion and sediment control measures (e.g., temporary berms, hay bales, silt fences, catch basin and inlet protection, tracking pads, concrete truck wash areas, stabilized construction entrances, compost filter socks, etc.) implemented in accordance with SWPPPs prepared under the SPDES General Permit would minimize the discharge of sediment that could potentially impact water quality and habitat for aquatic biota in the East River and Anable Basin. If dewatering is required, groundwater would be treated in accordance with applicable regulations and required permits prior to discharge to the Anable Basin, East River, or combined sewer. Therefore, construction facilitated by the Proposed Actions would take the necessary steps to not result in significant adverse impacts to water quality. Regarding ferry prop wash, Chapter 14 "Transportation" discusses the likely increase in ferry ridership from the proposed developments, however, no current data is available, at this stage, to indicate if additional ferry trips would be added each day. In addition, the resuspension of bottom sediment from ferry operations would be limited due to sufficient clearance between the vessel propeller(s) and bottom sediment and implementation of operational measures to minimize wakes generated by ferry operation. In addition, the FEIS will contain information about the historic contamination within Anable Basin.

Chapter 9 of the DEIS explains that to minimize sediment disturbance, in-water construction will follow the conditions of applicable USACE and DEC permits and utilize necessary erosion and sediment control measures, in accordance with SWPPPs prepared under the SPDES General Permit. Projected and potential development sites proposed development would be subject to due diligence (e.g., a Phase I Environmental Site Assessment [ESA]), permitting, and environmental review, as necessary, and would be subject to permit conditions and protective and mitigative measures. Any properties with an (E) Designation from the NYC Office of Environmental Remediation would be subject to air, noise, or hazardous materials investigations prior to redevelopment, thus protecting against potential harmful disturbance of contaminated sites. Groundwater recovered during construction would be treated in accordance with the New York City Department of Environmental Protection (DEP) and the New York State Department of Environmental

Conservation (DEC) requirements prior to discharge. Following these permits, regulations, and requirements would ensure that fish consumption risks and aquatic contamination would not be adversely affected with the proposed developments.

As stated in Chapter 10 of the DEIS, "Hazardous Materials," prior to construction, further investigation would be performed on each site. For example, the New York State Brownfield Clean Up Program (BCP) regulatory database, which contains sites on record with DEC as abandoned, idle, or under-used industrial and commercial sites where redevelopment is being contemplated under the DEC BCP, was reviewed to indicate the potential for hazardous materials. Next, a Phase I ESA would be prepared in accordance with American Society of Testing Materials (ASTM) Standard E1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Practice. The findings would be used to prepare a subsurface investigation protocol for agency review (i.e., DEC for BCP sites). Upon approval of the protocol, the investigation (typically including laboratory analysis of soil, groundwater, and soil vapor samples from the site) would be implemented and a report of the findings submitted to the agency along with the proposed remediation plan (i.e., measures to be implemented prior to or as part of construction to avoid impacts to the health and safety of workers, the community, and future occupants), which would include a construction health and safety plan to protect workers and the surrounding community during development activities. Therefore, construction, demolition, and cleanup impacted by BCP sites would follow the necessary steps to avoid significant adverse impacts.

Comment 189: The DEIS admits that waterfront construction will result in the permanent loss of DEC-regulated littoral wetlands—but provides no detailed mitigation plan. It minimizes this loss as "small" without mapping exact square footage or quantifying cumulative loss from nearby rezonings. This contradicts CEQR's mandate to identify direct and indirect long-term ecosystem impacts. The DEIS must evaluate cumulative wetland disturbance across all proposed developments, detail shoreline hardening impacts, and disclose how wetland biodiversity and tidal flushing dynamics will be altered. Anything less violates CEQR's ecosystem protection standards. (LICC-HPCC_001)

Response 189: While the Proposed Actions have the potential to facilitate in-water construction associated with shoreline and bulkhead

improvements that would affect tidal wetlands, designs for those in-water structures have not been developed. Therefore, adequate detail to quantify or estimate impacts to wetlands does not exist currently. However, as stated in Chapter 9 "Natural Resources" of the DEIS, construction would be required to avoid and minimize impacts to wetlands and water quality and mitigate impacts in accordance with USACE and DEC permit conditions, and the projected and potential development sites would require the implementation of erosion and sediment control measures. There would be no significant adverse natural resources impacts as a result of the Proposed Actions. However, potential shoreline and bulkhead improvements would result in structures places within the East River and Anable Basin. National Wetlands Inventory-mapped wetlands and DEC-regulated littoral zone tidal wetlands are present in the study area. In-water construction would be required to first avoid and then minimize impacts to wetlands and water quality in accordance with, as noted above, USACE and DEC permits. Erosion and sediment control measures (e.g., temporary berms, hay bales, silt fences, catch basin and inlet protection, tracking pads, concrete truck was areas, stabilized construction entrances, etc.) implemented in accordance with Stormwater Pollution Prevention Plans (SWPPPs) prepared under the SPDES general permit would minimize the discharge of sediment to the littoral zone tidal wetlands in the East River during construction activities. Potential impacts to littoral zone tidal wetlands would require coordination with DEC. No vegetated wetlands would be impacted by the Proposed Actions.

Comment 190: The DEIS identifies federally endangered species like the Atlantic sturgeon and multiple sea turtles but dismisses risk because they are "only transients." CEQR requires evaluating whether a project might alter migration corridors or aquatic foraging habitat—regardless of frequency. Even occasional disturbance in a migratory chokepoint like the East River can have disproportionate effects, especially in Hunters Point North along the East Channel where Roosevelt Island forces the river into a narrow waterway with powerful currents. In-water construction and shading from overhangs or towers must be evaluated for timing overlap with peak migration. The DEIS's blanket dismissal of impacts on transients violates federal ESA coordination and CEQR impact thresholds. (LICC-HPCC_001)

Response 190: As stated in Chapter 9, "Natural Resources," of the DEIS, Atlantic sturgeon do not spawn in the East River as they have specific

spawning grounds in the Hudson River, and they are only expected to migrate and opportunistically forage in the East River because it connect the Hudson River to marine waters (Savoy and Pacileo 2003, Tomichek et al. 2014). Shortnose sturgeon, are also only expected in the East River on rare and brief occasions as transients emigrating from the Hudson River to more southerly populations (Waldman et al. 1996, Kynard 1997). In addition, the East River is not a known migration path for sea turtles. Any occurrence of green, loggerhead, and Kemp's ridley sea turtles in Upper New York Harbor is likely limited to rare and brief explorations by transient juveniles. In addition, the average Secchi transparency (i.e., a measure of light attenuation in the water column) is 3.5 feet in the East River. Atlantic sturgeon and shortnose sturgeon are bottom-feeding fish, and thus commonly occupy parts of the water column with low-light levels. Therefore, incremental shadows from the Development Sites would not adversely affect these species. It is also anticipated that in-water construction would be limited to shoreline and bulkhead improvements, which would not significantly extend into the East River, therefore not impeding migration of these species. Given that Atlantic sturgeon, shortnose sturgeon, and sea turtles are transient species with limited potential to occur in the East River near the study area, and considering the mobility of fish and turtles, no significant impacts to these species are anticipated.

Comment 191: The DEIS repeatedly asserts the plan will "improve ecological communities" through added plantings and open space—but offers no metrics or site plans to prove this. Wildlife and pollinator habitat improvements must be evaluated against the full ecological baseline. CEQR requires a habitat value comparison between existing and proposed land cover. What vegetation will replace existing lots? Will new open space have native species or maintenance regimes conducive to urban biodiversity? Without a habitat suitability analysis, this claim lacks substance and fails to meet CEQR disclosure requirements. (LICC-HPCC_001)

Response 191: As discussed in Chapter 9 "Natural Resources," the study area is in a predominantly urbanized area of Queens and contains limited natural ecological communities. Ecological communities within the terrestrial study area are limited to mowed lawn with trees, flower/herb garden, paved road/path, urban structure exterior, urban vacant lot, and riprap/artificial shore communities. These ecological communities, in addition to being common throughout New York City, are characterized by human disturbance and

provide limited habitat value to wildlife in the area. Since the baseline has limited vegetation, trees, plants, and other landscaping features required by applicable zoning provisions would improve ecological communities within the study area. Therefore, the Proposed Actions have the potential to enhance ecological communities and create new vegetated areas in the study area, and ultimately result in improved wildlife habitat.

Metrics and site plans are included in Chapter 8 “Urban Design” and Chapter 5” “Open Space”. Chapter 8 “Urban Design,” includes metrics on square footage of open space associated with different proposed development sites. For example, “The Proposed Actions would provide up to 6 acres of publicly accessible open space in the subarea, where the only existing open space is the 0.11-acre pier at 44th Drive.” Chapter 5 “Open Space,” also provides a quantitative assessment stating that the acres of total active open space and passive open space would both increase in the With Action condition. At this stage of the rezoning process, designs for any of the Development Sites have not progressed to the point of including detailed landscaping plans and therefore a detailed discussion of what species would be planted, how they may impact urban biodiversity, or specifically how they would improve habitat for wildlife and pollinators is not currently feasible. However, the proposed increase of open space is specified, and plantings associated with future developments will be guided by applicable city and state standards, which support ecological value and biodiversity.

HAZARDOUS MATERIALS

Comment 192: The DEIS admits hazardous materials concerns on every development site—citing oil refineries, solvents, leaking tanks, and 70+ sites with petroleum or chemical spills—yet claims all risks are resolved by applying a generic (E) Designation. This one-size-fits-all approach fails to provide site-specific remediation plans or guarantee long-term enforcement. CEQR requires more than boilerplate assurances. The DEIS must identify the severity of contamination at each site, disclose when Phase II investigations will occur, and explain how NYC Office of Environmental Remediation (OER) will monitor 70+ locations simultaneously. Anything less is a regulatory evasion of the public health protections CEQR was designed to ensure. (LICC-HPCC_001)

Response 192: According to the *CEQR Technical Manual*, the purpose of the hazardous materials evaluation is “to determine whether the

proposed project may increase the exposure of people or the environment to hazardous materials, and, if so, whether this increased exposure would result in potential significant public health or environmental impacts. If significant adverse impacts are identified, CEQR requires that the impacts be disclosed and mitigated or avoided to the greatest extent practicable" (2021 City Environmental Quality Review (CEQR) Technical Manual, Chapter 12). When the review identifies the need for long-term measures to be incorporated after CEQR, but prior to or during development, and when testing is not practical (i.e. no site control, access issues, etc.) during CEQR, the *CEQR Technical Manual* states that an institutional control such as an (E) Designation may be placed on an affected site, under the authority and administration of the Mayor's Office of Environmental Remediation (OER). In addition, the *CEQR Technical Manual* states for "programmatic actions," such as an area-wide rezoning, site-specific conclusions may not be possible, and general conclusions regarding the types of impacts that may be expected is appropriate. Based upon the size of the project area and as testing is not practical due to access restrictions including lack of site control, the potential extent of contamination at each site will be determined through the (E) Designation process.

The (E) Designation program is regulated and administered by OER pursuant to Section 11-15 (Environmental Requirements) of the Zoning Resolution of the City of New York and Chapter 24 of Title 15 of the Rules of the City of New York. Under the (E) Designation program, the Department of Buildings (DOB) will not issue a building permit and temporary or final certificate of occupancy until OER issues a notice stating the requirements of the (E) Designation program have been satisfied. This includes any new construction, building expansion, and/or a change in the use of the property.

It is expected that development at the proposed and projected sites will not occur simultaneously. Regardless, OER is an NYC agency that has the capacity to manage the sites within its (E) Designation program.

Comment 193: The DEIS provides no enforcement mechanism or phasing plan for investigation and remediation. OER review is listed as a pre-permit condition, but there is no clarity on when sites will be remediated, what happens if funding lapses, or how decades of phased buildout will be tracked. This leaves room for development to proceed before clean-up is complete—exposing construction

workers, future residents, and surrounding communities to carcinogens like PCBs, PAHs, and heavy metals. CEQR requires a defined process and schedule for remediation. The DEIS must provide one. (LICC-HPCC_001)

Response 193: See response to Comment 191. The (E) Designation is an institutional control and its process is regulated under Section 11-15 (Environmental Requirements) of the Zoning Resolution of the City of New York and Chapter 24 of Title 15 of the Rules of the City of New York. The timelines for investigation and remediation are specified and controlled by OER under the (E) Designation program, and the DOB will not issue building permits and temporary or final certificates of occupancy until OER issues a notice stating the requirements of the (E) Designation program have been satisfied.

The placement of the (E) Designation on each of the sites ensures the investigation, remediation and mitigation of hazardous substances, with consideration to the proposed future use and occupants of each site.

Comment 194: The DEIS acknowledges shallow groundwater flows west toward the East River—but offers no modeling of contaminant migration into surrounding parcels or the river itself. Groundwater can carry petroleum byproducts and heavy metals off-site, particularly where multiple brownfield or leaking tank sites abut each other. CEQR requires analysis of hydrologic connections and the potential for cross-contamination. The DEIS must include groundwater contaminant plume modeling, evaluate backflow risks from high tides and storm surges, and disclose how legacy pollutants might be mobilized during excavation. (LICC-HPCC_001)

Response 194: See response to Comment 191.

Comment 195: The DEIS repeatedly uses “historic industrial uses” as a euphemism to downplay active risks, but many sites are active or recently shuttered. Numerous parcels are listed in state databases for active Brownfield Cleanup, leaking tanks, or manifest violations. The DEIS must clarify which sites have active spills, unresolved enforcement actions, or contamination under active management. Treating recent and legacy pollution the same way, without disclosing timelines or remediation stage, hides real risks and violates CEQR’s transparency standards. (LICC-HPCC_001)

Response 195: The project area has been developed with commercial and manufacturing uses as early as 1898. The DEIS included a review of available Sanborn Fire Insurance Maps, City Directories and database listings; however, the exact manufacturing and/or industrial use is not always specified on these resources or available. Thus, it is not possible to list each individual historic use of concern and thus the term "historic industrial uses" is used to identify that there are historic uses of concern which will require further investigation during the subsurface investigation conducted as part of the (E) Designation process. The DEIS included a thorough evaluation in which consideration was given to each of the concerns, and the DEIS identifies "Notable On-Site Database Listings" and "Concerns within 400-foot Radius" in Table 10.1. The (E) Designation program requires individual consideration for each site throughout the investigation and remediation phases.

Comment 196: There is no mention of how dust, noise, or hazardous vapor will be monitored and mitigated in neighborhoods adjacent to active cleanups. Where is the air monitoring plan? Who oversees soil management when trucks move contaminated fill? Without clear community health protections and public access to cleanup data, this DEIS fails the most basic test of environmental justice. (LICC-HPCC_001)

Response 196: See responses to the comments above. Site-specific Health and Safety Plans (HASPs) are required as part of the (E) Designation process during site investigation, and Site-Specific Construction Health and Safety Plans (CHASPs) are required during remediation and construction activities. Air monitoring provisions are included in the HASPs and CHASPs. Soil management activities including excavation, stockpiling, transportation and disposal of soil are outlined in the site-specific Remedial Action Plans, which are reviewed and approved by OER.

Comment 197: I have lived with the many changes in this area since 1997 and know firsthand that the manufacturing left behind toxic materials, brownfields if you will that have never been cleaned up and fear the same will happen with your plan, releasing more poisons into the atmosphere. (Dodes-Callahan_CL_023)

Response 197: As described in the DEIS, the potential for significant adverse impacts associated with hazardous materials resulting from the Proposed Actions would be precluded through compliance with

existing regulatory requirements and the placement of an (E) Designation on all projected and potential development sites

Comment 198: Plaxall proposes that the (E) Designation text in the Final EIS expressly recognize the possibility that its requirements can be satisfied by providing OER with proof of DEC approval of work plans and reports that would otherwise require review and approval of OER. We note that this approach is permissible pursuant to R.C.N.Y. §§ 43-1473(c), 43-1474(b)(6) and (c)(1), and appropriate to expressly include in the (E) Designation for the Plan, given that several projected development sites are enrolled in the BCP.

Proposed additional text for the (E) Designation proposed in the DEIS (page 10-32) is set forth below:

Provided, however, that any of Tasks 1-4 may be satisfied by submission to OER proof that the New York State Department of Environmental Conservation has approved a corresponding work plan or report pursuant to a remedial program that addresses investigation and/or remediation of the subject site. (Hare_Plaxall_055)

Response 198: Comment noted.

Water AND SEWER INFRASTRUCTURE

Comment 199: The Draft EIS ignores the cumulative burdens on the sewer system. While it projects an increase of 3.64 million gallons per day (mgd) of wastewater—equal to a 3.2 percent increase for Bowery Bay WRRF [Water Resource Recovery Facility]—the Draft EIS fails to assess cumulative impacts from nearby rezonings like Innovation QNS, Silvercup West, and Hallets Point. CEQR requires accounting for “reasonably foreseeable” development. This omission underestimates infrastructure strain and violates CEQR guidance on cumulative analysis. The City must analyze whether Bowery Bay WRRF and downstream infrastructure can handle combined increases without additional overflow or treatment failure during peak storm events. (LICC-HPCC_001)

Response 199: As discussed in Chapter 11 of the DEIS, “Water and Sewer Infrastructure,” the analysis of water and sewer infrastructure was prepared in accordance with the 2021 *CEQR Technical Manual*. The analysis considers the potential effects of sanitary sewage generation resulting from the projected development in the Project Area; the projected increase in sanitary sewage generation from

other projects is beyond the scope of the analysis. As noted in the chapter, the average monthly flow to the Bowery Bay WRRF is currently 113 million gallons per day (mgd), which is approximately 75 percent of the WRRF's permitted capacity (150 mgd). With the additional projected sanitary sewage generation on the projected development sites (approximately 3.64 mgd on the projected development sites, the Bowery Bay WRRF would continue to have reserve capacity). In addition, in accordance with the New York City Plumbing Code, Local Law 33 of 2007, and the U.S. Environmental Protection Agency's (EPA) WaterSense Program, all development on the projected development sites would be required to utlilize low-flow plumbing fixtures to reduce sanitary flow and load at the WRRF.

Comment 200: The DEIS claims CSO volumes will decrease, yet Table 11-9 shows increases in total combined sewer volume across all rainfall scenarios. This contradiction stems from assumptions that are not backed by modeling that includes Unified Stormwater Rule enforcement. CEQR mandates a "reasonable worst-case" analysis—not optimistic projections. The document must recalculate CSO volumes using enforceable drainage commitments and disclose peak hour stormwater impacts, not assume compliance or ignore site-specific constraints, such as those at Anable Basin, that may block stormwater best management practices. (LICC-HPCC_001)

Response 200: As noted in Chapter 11 of the DEIS, "Water and Sewer Infrastructure," the projections of combined sewer flows presented in Table 11-9 do not account for the DEP-regulated stormwater flow rate: each development site will trigger Chapter 31 of the Unified Stormwater Rule and will be required to implement slow-release drainage controls to meet the updated on-site release rate and volume requirements. The required on-site detention would be determined on a site-by-site basis for each projected development and enforced as part of the DEP site connection approval process, which is required for all new construction that connects to the City's sewer system. As a result of these requirements, and given that the existing development sites are unlikely to provide significant detention, it is expected that there would be an increase in on-site detention and retention as a result of the Proposed Actions. It is expected that improved on-site stormwater management on the projected development sites would offset the increase in sanitary flow resulting from the new higher-density development, so CSO

volumes discharged from the projected development sites would decrease overall.

Comment 201: The DEIS acknowledges that full compliance with the Unified Stormwater Rule and sewer upgrades may be required but offers no timeline, enforcement mechanism, or cost analysis. CEQR requires disclosing not just impacts but feasible mitigations. Who will fund on-site retention, off-site connections, and sewer upgrades? How will DEP enforce these commitments across dozens of sites over decades? A vague reference to SCP applications is not sufficient. The DEIS must present a phased infrastructure plan showing triggers for upgrades, responsible parties, and financial responsibility. (LICC-HPCC_001)

Identify and fund a package of sewer capacity upgrades necessary to accommodate the additional population from rezoning. In addition, the City must provide a comprehensive plan for upgrading existing sewer infrastructure to meet the needs of current residents and buildings constructed under previous LIC rezonings, many of which continue to experience flooding and drainage issues due to outdated or insufficient capacity (CB2_Queens_002)

Capital funding for sewage and plumbing infrastructure is critical for the future of the College and LIC. We have old industrial buildings and infrastructure upgrades will help address current needs as well as accommodate the growth of LaGuardia. (Adams_LCC_021)

Hunters Point has grown considerably since I've been here but the infrastructure has not matched the growth which seems backwards. (Dodes-Callahan_CL_023)

Response 201: See response to Comment 200. Compliance with the Unified Stormwater Rule (Chapters 31 and 19.1 of Title 15 of the Rules of the City of New York [RCNY]) is required for all development seeking connection to the City's sewer system, and the required on-site detention would be determined on a site-by-site basis for each projected development and enforced as part of the DEP site connection approval process. In addition, as discussed in Chapter 11 of the DEIS, "Water and Sewer Infrastructure," it is expected that an Amended Drainage Plan (ADP) will be prepared for the Project Area. Upgrades to the sewer system may also be required if identified in the ADP; if necessary, these infrastructure improvements would be provided by the applicants for each projected development site as part of the Site Connection Proposal Application (SCP).

Comment 202: The project area lies within a low-lying, waterfront, combined sewer catchment—yet the DEIS assumes system performance based on average dry weather flows and dismisses the impact of extreme rainfall events, which CEQR and NYC Flood Hazard Mapper now require planners to consider. Ignoring increased rainfall intensity from climate change and impervious area expansion risks flooding, backups, and public health impacts. The DEIS must model these effects under a climate-adjusted scenario to meet CEQR's public safety review requirements. (LICC-HPCC_001)

Response 202: An assessment of the Proposed Actions' potential to result in flooding in consideration of climate change is provided in the Waterfront Revitalization Program (WRP) consistency assessment, found in Appendix C of the DEIS. As discussed in that assessment, the Proposed Actions would result in a new resilient waterfront by raising the grade of the waterfront in connection with the construction of mixed-use developments. The modified WAP would create a continuous raised shoreline that would include a mix of hard infrastructure as well as natural features such as native coastal plantings to provide flood protection and erosion control. In consideration of future rainfall events, all development in the Project Area would be required to implement slow-release drainage controls to meet the updated on-site release rate and volume requirements. In addition, as discussed in Chapter 11, "Water and Sewer Infrastructure," the waterfront projected development sites in the Project Area would be required to incorporate stormwater management systems that would collect all stormwater and covey it to the water body, in conformance with DEP regulations. These measures are expected to reduce stormwater flows to the combined sewer system. See also the responses to Comments 200 and 201.

Comment 203: The DEIS claims that several waterfront parcels (e.g., Sites 63, 64, 65, 67, 69, 71) will benefit the system by discharging stormwater directly to the East River. Yet it provides no analysis of pollutant loads from runoff, erosion risks, or water quality degradation—especially given increased paved area and traffic. CEQR requires assessing water quality effects on receiving water bodies. This analysis is missing. The DEIS must evaluate pollutant concentration, riverbank stabilization, and potential contamination risks from direct discharge sites. (LICC-HPCC_001)

Response 203: An assessment of the Proposed Actions' potential effects on water quality is provided in Chapter 9 of the DEIS, "Natural Resources."

As noted in that assessment, the Proposed Actions would result in a reduction of CSO discharges to the East River. See also the responses to Comments 200 and 201. The Bowery Bay WRRF has sufficient capacity to treat potential sanitary wastewater from the projected developments under the Proposed Actions in accordance with its SPDES permit prior to discharging it the East River. Therefore, operation of the Proposed Actions would not result in significant adverse impacts to water quality of the East River. In addition, as discussed in Chapter 11 of the DEIS, "Water and Sewer Infrastructure," the waterfront projected development sites would directly discharge stormwater to the river rather than to the combined sewer system, measures to address potential pollutants would be determined in the design of each site's stormwater management system as required by DEP regulations.

Comment 204: The DEIS repeatedly cites compliance with the Unified Stormwater Rule and SCP process to argue that no adverse impacts will occur. But CEQR requires analysis of what will happen if compliance is partial, delayed, or technically constrained. Given the scale of the rezoning and complexity of the sites, it is unrealistic to assume 100 percent rule adherence without examining onsite barriers to BMPs, retention systems, or green infrastructure. A compliance-based assumption without enforceable commitments is not an impact analysis—it's wishful thinking. (LICC-HPCC_001)

Response 204: See the response to Comment 200 above. In accordance with the *CEQR Technical Manual*, the assessment considers the potential effects of the Proposed Actions on sewer and wastewater treatment infrastructure. Enforcement of and compliance with existing regulations relating to stormwater management are beyond the scope of this assessment.

Comment 205: Require developers to integrate green infrastructure elements (such as permeable paving, green roofs, rain gardens, and bioswales) into new projects to mitigate runoff and reduce pressure on the combined sewer system. (CB2_Queens_002)

Response 205: See the responses to Comments 200 and 201 above. As discussed in Chapter 11 of the DEIS, "Water and Sewer Infrastructure," all development is required to implement stormwater management practices (SMPs) in accordance with the Unified Stormwater Rule. Although the projected growth under the Proposed Actions would increase sanitary flows to the City's combined sewer system, is expected that there would be a

decrease in stormwater flows to the combined sewer system as a result of the increased direct stormwater discharge from the waterfront projected development sites as well as the increased detention of stormwater runoff.

Comment 206: I am especially concerned about the public sites in Anable Basin that are being lumped in with private sites. These sites are known to be vulnerable to flooding and the area already has problems with sewer capacity. (Chan_BWB_034)

Response 206: An assessment of the Proposed Actions' potential to result in flooding in consideration of climate change is provided in the Waterfront Revitalization Program (WRP) consistency assessment, found in Appendix C of the DEIS. As discussed in that assessment, the Proposed Actions would result in a new resilient waterfront by raising the grade of the waterfront in connection with the construction of mixed-use developments. The modified WAP would create a continuous raised shoreline that would include a mix of hard infrastructure as well as natural features such as native coastal plantings to provide flood protection and erosion control. In consideration of future rainfall events, all development in the Project Area would be required to implement slow-release drainage controls to meet the updated on-site release rate and volume requirements. In addition, as discussed in Chapter 11, "Water and Sewer Infrastructure," the waterfront projected development sites in the Project Area would be required to incorporate stormwater management systems that would collect all stormwater and covey it to the water body, in conformance with DEP regulations. These measures are expected to reduce stormwater flows to the combined sewer system.

Comment 207: Investing in sewage, plumbing, and resilience infrastructure: DEP is conducting a Drainage Study that will not be complete until 2026. So far, they will not commit capital investments to address existing sewer and plumbing infrastructure until that study is complete, despite evidence of ongoing flooding and sewer issues in the area. $95 million was previously committed to the Anable Basin area as part of the Amazon HQ2 failed rezoning, but that funding has now been reallocated elsewhere. In order to support this rezoning, we need a minimum commitment of $95 million from DEP to begin addressing current sewer and plumbing infrastructure issues, along with written commitment of additional funding upon completion of the drainage study. (Won_NYCC_051)

Response 207: Comment noted.

Comment 208: A decently functioning storm and wastewater system is a necessary element for a neighborhood before it accepts the construction of tens of thousands of new residential units. I have seen over recent years: sewage backups in multiple basements in homes on Vernon Boulevard, toilets overflowing. (Brooks_LICC_WQCLT_059)

Response 208: The analysis presented in Chapter 11 of the DEIS, "Water and Sewer Infrastructure," determined that the Proposed Actions would not result in any significant adverse impacts on the City's wastewater treatment or stormwater management infrastructure. In particular, in connection with the ADP that is expected to be prepared for the Project Area, upgrades to the sewer system in the area to support the higher density development. If necessary, these infrastructure improvements would be provided by the applicants for each projected development site as part of the SCP. See also the responses to Comments 200 and 201).

SOLID WASTE AND SANITATION SERVICES

Comment 209: The DEIS projects an 841-ton per week increase in solid waste—more than 50 times the threshold that triggers CEQR review. Yet it calls this a "negligible increase," based on systemwide DSNY and private carting totals. CEQR requires site- and district-level capacity analysis, not citywide dilution. With 56 new DSNY trucks per week and increased private carter traffic in a Commercial Waste Zone, the risk of local collection failures, sidewalk overflow, and environmental justice impacts is real. The DEIS must provide local hauling route analysis, infrastructure capacity reviews, and sanitation mitigation plans—not vague reassurances. (LICC-HPCC_001)

Chapter 12 of the DEIS, "Solid Waste," examines the Proposed Actions' potential for significant adverse impacts on solid waste and sanitation services. As concluded in the chapter, no significant adverse impact is expected as a result of the Proposed Actions.

The DEIS does not identify which transfer stations or material recovery facilities (MRFs) will receive waste from this 54-block upzoning. Without this, there's no analysis of truck routing, traffic impact, or capacity at regional transfer hubs. CEQR requires identifying specific facilities to assess transportation burden, especially under Commercial Waste Zone implementation. The

City cannot claim the waste "fits within the system" without analyzing where it goes, how it gets there, and what communities or infrastructure will absorb it. (LICC-HPCC_001)

Response 209: As discussed in Chapter 12, "Solid Waste and Sanitation Services," the analysis in the DEIS describes existing and future solid waste disposal practices, including the collection system and disposal methods, estimates the solid waste generated by activities within the affected area in the future with and without the Proposed Actions, forecasts solid waste generation based on rates for typical land uses and activities as provided in the *CEQR Technical Manual*, and assesses the effects of the Proposed Actions' incremental solid waste generation on municipal and private sanitation services and on the community in the With Action condition.

Comment 210: While the DEIS mentions that trash will be "compacted and containerized," it offers no analysis of curbside trash congestion, pickup frequency, or enforcement—despite 14,699 new residential units. In dense neighborhoods like LIC, overflowing bins and inadequate collection lead to vermin, odor, and blocked pedestrian routes. CEQR requires that public realm quality be evaluated when large increases in residential density occur. The DEIS must disclose square footage of curbside and storage space planned for waste, show collection schedules, and assess rodent impact risks. (LICC-HPCC_001)

Response 210: The analysis in the DEIS was conducted in accordance with *CEQR Technical Manual* guidance.

Comment 211: Despite claiming consistency with the City's Solid Waste Management Plan (SWMP), the DEIS makes no mention of food scrap collection, organics compliance, or circular waste strategies. With nearly 40,000 new residents, LIC could generate major volumes of food waste—but the DEIS ignores how or if these will be separated, collected, or composted. Local Law 85 and the Zero Waste Goals outlined in OneNYC require aggressive organics diversion. Failure to integrate those into site planning and design contradicts both CEQR and City environmental policy. (LICC-HPCC_001)

Response 211: Household waste generated by the incremental residential population would be handled by the Department of Sanitation (DSNY), which manages the collection of solid waste from residential buildings. DSNY also enforces the separation of

recyclables and food scraps for composting and subsequent disposal at residential properties.

Comment 212: The DEIS treats its 144-ton/week increase in commercial waste as isolated and insignificant—yet several adjacent rezonings (Innovation QNS, Hallets North, and Queens Plaza) are proceeding simultaneously. CEQR requires cumulative impact analysis across similar adjacent actions. If each project adds dozens of commercial hauls weekly, the net effect will overwhelm truck routes, transfer stations, and material recovery facilities. The DEIS must be revised to consider this neighborhood-scale load and propose a coordinated sanitation strategy. (LICC-HPCC_001)

Response 212: The DEIS sufficiently considers the potential effects of the Proposed Actions on solid waste pursuant to the guidance of the *CEQR Technical Manual*. The DSNY handles disposal of household waste. Waste from commercial establishments is managed by private carters.

Comment 213: The local board is constantly fighting With Hunters Point for access yet still has not provided signs for cleaning the waterfront because they don't want to encroach on vendors, many of whom are not licensed and brings rats from food left behind and more garbage which they do not clean up. Center Blvd and the surrounding streets are never fully cleaned. (Dodes-Callahan_CL_023)

Response 213: Comment noted. The DSNY addresses street cleaning in New York City.

ENERGY

Comment 214: The Draft EIS fails to address cumulative stress on the electrical grid. Instead, the Draft EIS minimizes the cumulative impact of nearly 15,000 new housing units and 3.4M SF of commercial space by calling its energy impact "negligible." This ignores grid constraints and cumulative demand from nearby developments like Silvercup West, Queens West, and Hunters Point South. The analysis must assess cumulative energy loads on Con Edison's Zone J grid, quantify infrastructure upgrades needed, and clarify whether local substations have capacity. Without this, the analysis violates CEQR's mandate to disclose cumulative and indirect environmental impacts and is technically deficient under Chapter 13 of the *CEQR Technical Manual.* (LICC-HPCC_001)

Response 214: As discussed in the Draft EIS, the annual energy consumption across all the development sites was estimated and compared to the annual energy demand for the New York City service area (identified by NYISO as the single load zone, Zone J) under both a fully electrified scenario as well as a scenario that included potential development sites using fossil fuels (assuming development sites would be constructed before the relevant deadlines described within Local Law 154 of 2021). The Proposed Action's maximum annual electricity consumption was estimated to represent approximately 0.5 percent of the annual demand within the load zone where electricity demand is aggregated and monitored.

Additionally, construction is currently underway to connect the Vernon area substation serving the Project Area and the Newtown area substation—the Reliable Clean City-Long Island City. Consequently, the potential increase is within the forecasted demand considered by Con Edison within its long-term transmission and distribution planning, and infrastructure improvements are not anticipated.

Comment 215: While the DEIS models a fully electrified scenario, it simultaneously allows gas-fired systems through 2028 without detailing how many buildings will lock in fossil fuel infrastructure before the Local Law 154 deadline in 2028. This hedging creates ambiguity in climate impact and load forecasts. How many sites are expected to beat the 2028 exemption? How will that affect grid electrification planning? Without a phasing schedule showing fossil fuel vs. electric split and a load curve showing peak demand impacts, this chapter evades accountability and fails CEQR's requirement to disclose foreseeable infrastructure burdens. (LICC-HPCC_001)

Response 215: The Reasonable Worst-Case Development Scenario (RWCDS) expected under the Proposed Actions identifies development sites that are anticipated to be developed. As described in Chapter 20, "Construction," of the DEIS, a conceptual construction phasing and schedule for the RWCDS was prepared for analysis purposes by DCP to illustrate how development could proceed through 2035. Because the projected development sites in the rezoning area are predominantly in private ownership, the timing of the development of those sites is unknown. As such, the RWCDS presented does not describe which of the sites would be developed first to assume a particular sequence of development and it is not possible to determine the number of sites that would be developed before the

relevant deadlines as described in Local Law 154 of 2021. Market and site conditions would ultimately determine the sequence of construction of developments.

Furthermore, sites that being construction ahead of the relevant deadlines may propose to develop fully electrified buildings to ensure the buildings would fall under the future building carbon intensity limits as established under Local Law 97 of 2019. Therefore, the electricity consumption under a scenario where development sites would be fully electrified and a scenario where natural gas would be utilized were both estimated. The maximum annual electricity consumption was conservatively used to determine the potential for energy impacts. Similarly, the analysis conservatively estimates electricity consumption by not including electricity generated through on-site renewable sources that the design of an individual development site may include to demonstrate compliance with the solar/green roof requirements of Local Laws 92/94 of 20219.

Comment 216: CEQR requires disclosing whether new development will stress local utility networks. However, Chapter 13 provides no site-specific energy infrastructure assessment. It does not list the local substations serving the rezoning area, their current loads, capacity limits, or whether upgrades will be required to support the projected electric demand. Without a distribution-level analysis and coordination with Con Edison's substation plans, the DEIS ignores neighborhood-level reliability risks, especially for public and emergency facilities. This omission directly contradicts CEQR's technical requirements for energy infrastructure impact evaluation. (LICC-HPCC_001)

Response 216: As stated in the *CEQR Technical Manual*, in lieu of a detailed assessment, which is generally limited to actions that may significantly affect the transmission or generation of energy, a detailed assessment of energy impacts would be limited to projects that may significantly affect the transmission or generation of energy. Most actions resulting in new construction would not create significant energy impacts, and, as such, do not require a detailed energy assessment. However, a proposed action's operational energy consumption should be estimated.

New building and alteration projects are subject to the New York City Energy Conservation Code (NYCECC), which comprises the 2020 Energy Conservation Construction Codes of New York State (ECCCNYS), in addition to a series of local laws. Therefore, the

amount of energy that would be consumed annually as a result of the day-to-day operation of the buildings and uses resulting from the Proposed Actions is disclosed in Chapter 13, "Energy," the DEIS.

Comment 217: The DEIS uses only two conceptual eQUEST models—one 12-story residential and one 10-story office building—to represent over 23M square feet of development. These oversimplified typologies cannot account for height, use mix, and envelope variation across 54 blocks. This leads to unclear projections and could grossly underestimate heating, cooling, and plug loads, especially for high-rise towers or life science labs. The DEIS must include a range of representative building types and disclose how its modeling captures NYC-specific building patterns. Currently, it fails to provide a reliable "reasonable worst-case development scenario." (LICC-HPCC_001)

Response 217: As discussed in the DEIS, the two conceptual eQUEST energy models were used to develop energy intensities (kBTU per sf) that incorporates local meteorology, solar radiation, and energy requirements under the 2020 ECCNYS and NYCECC. Furthermore, the conceptual models were prepared for a full electrified building and a building that would utilize natural gas. The results of the energy modeling are consistent with latest energy consumption factors for office and residential buildings from the U.S. Energy Information Agency (EIA). However, the energy consumption factors for life science labs and manufacturing were revised for the FEIS to use the latest EIA energy factors for these land uses in order to ensure that energy consumption was conservatively estimated.

Comment 218: Despite referencing the Climate Mobilization Act and Local Law 154, the DEIS fails to discuss onsite renewable energy (e.g., solar), battery storage, or load management strategies. A truly climate-responsive plan must evaluate demand-side solutions, especially if 290 GWh will be added to the grid. Will buildings comply with LL97? Are they required to include battery backup or solar-ready roofs? Does the plan coordinate with NYSERDA or Con Edison's Clean Energy Hubs? Without addressing decarbonization strategies, this DEIS fails to align with NYC's climate adaptation policies or to mitigate its own energy footprint. (LICC-HPCC_001)

Response 218: The Reasonable Worst-Case Development Scenario (RWCDS) expected under the Proposed Actions identifies development sites that are anticipated to be developed. Because the projected development sites in the rezoning area are predominantly in private ownership, the timing, design, and energy efficiency measures of the development of those sites are unknown. However, individual development sites would be required to demonstrate that the building design would be in compliance with the City's sustainability regulations that are designed to ensure carbon emission and building energy consumption are reduced. This includes obtaining approvals from the New York City Department of Building that the proposed building would meet the rooftop solar/green roof requirements under Local Laws 92/94 of 2019, the fossil fuel requirements under Local Law 154 of 2021, and the energy performance requirements under the 2020 New York City Energy Conservative Code (NYCECC). Development sites will also be required to submit detailed estimates of the property's electrical demand (including the type and capacity of appliances and equipment) to Con Edison before obtaining new or upgraded electrical service. The utility will use this information to determine if any infrastructure upgrade are required to provide service at the time. Following construction, developments would also be requirement to demonstrate annual compliance with the carbon intensity limits for buildings established under Local Law 97 of 2019.

Comment 219: The DEIS claims the energy impact is "negligible." By contrast, the community's Vision Plan for Resiliency prioritizes resiliency, redundancy, and infrastructure equity. Increased electricity dependence—without district-scale solutions, microgrids, or community solar—creates new vulnerabilities during heatwaves or outages. A single-point grid failure could now affect tens of thousands of new residents. The DEIS must explain how this plan aligns with energy resiliency principles from the community plan, or it risks directly contradicting its stated goals and violating CEQR's neighborhood character and public health review criteria. (LICC-HPCC_001)

Response 219: The Reasonable Worst-Case Development Scenario (RWCDS) expected under the Proposed Actions identifies development sites that are anticipated to be developed. Because the projected development sites in the rezoning area are predominantly in private ownership, the timing, design, and energy efficiency measures of the development of those sites are unknown.

However, individual development sites would be required to demonstrate that the building design would be in compliance with the City's sustainability regulations that are designed to ensure sustainable and resilient building energy consumption. As described in Chapter 16, "Greenhouse Gas Emissions and Climate Change," much of the Project Area is currently within either the 1 percent annual chance floodplain (100-year floodplain) or the 0.2 percent annual chance floodplain (500-year floodplain) and the majority of identified development sites would be required to meet the resilient design guidelines in accordance with Appendix G of the New York City Building Code. Furthermore, new developments would be required to demonstrate compliance with the rooftop solar/green roof requirements under Local Laws 92/94 of 2019, the fossil fuel requirements under Local Law 154 of 2021, and the energy performance requirements under the 2020 New York City Energy Conservative Code (NYCECC). These requirements ensure that new buildings are designed to include on-site generation, address localized urban heat effects, and would not overburden the electrical grid.

As discussed in Chapter 13, "Energy", the maximum annual electricity consumption for the RWCDS would increase the electricity demand by approximately 0.5 percent when compared to the projected future electricity demand and is within the forecasted demand considered by Con Edison for its long-term transmission and distribution planning, and infrastructure improvements are not anticipated.

TRANSPORTATION

Comment 220: The recently renovated wharf in Queensbridge Park presents a ready-made location for a new terminus of the East River route of the NYC Ferry system. For many residents and businesses within walking or biking distance, the addition of a new ferry stop at Queensbridge is a high priority. (LICC-HPCC_001)

Response 220: Comment noted. EDC and its ferry operator regularly review and revise service schedules, and any service changes would be subject to approval by EDC.

Comment 221: Our area is overburdened with little space for residential parking as it is, yet your plan wants to make a fully residential area the draw for thousands more and all of another community that also has waterfront property. (Dodes-Callahan_CL_023)

Response 221: The transportation analyses in Chapter 14, "Transportation," of the EIS assess the potential for the RWCDS associated with the Proposed Actions to result in significant adverse impacts to all modes of transportation serving the Project Area, including parking. The Proposed Actions' RWCDS includes 3,236 on-site parking spaces on projected development sites that would accommodate a portion of the parking demand. Also, as discussed in Chapter 1, "Project Description," the parking demand generated by new development was evaluated and it concluded that the is well-served by alternate transportation options, and any potential parking shortfalls associated with the Proposed Actions would not be considered significant pursuant to the guidance of the *CEQR Technical Manual*.

Comment 222: Also, there is widespread skepticism that the proposed Industrial Business Zone upzoning for taller structures will produce additional space that will be workable and affordable for industrial and related businesses. The transportation section tellingly lacks any analysis of trucking access and curbside loading and unloading requirements for the project and context areas. (Venech_041)

Response 222: Trucking access and curbside loading are beyond the purview of CEQR for neighborhood rezoning projects.

Comment 223: Regarding the Long Island City Neighborhood Plan rezoning, in reference to the Draft Environmental Impact Statement chapter, Unavoidable Adverse Impacts, Brooklyn Community Board #1 is deeply concerned about the predicted severe adverse impacts of this proposed rezoning on G train capacity during rush hour, both with the recommended additional trains implemented and without. Without the recommended mitigation, it is estimated that during the AM and PM rush hours, G train subway car capacity will exceed 100 percent.

Additionally, in the G train subway haul analysis Brooklyn Community Board #1 wants to ensure that the increased ridership calculation has included planned large-scale as-of-right housing developments on the Greenpoint and Williamsburg waterfronts, in the analysis of the LIC Neighborhood Plan's Environmental Impact. If predicted future Greenpoint and Williamsburg ridership has not been included in this analysis, then a new calculation must be performed. (CB1_Brooklyn_147)

Response 223: As discussed in the Chapter 14, "Transportation," of the EIS, it is expected that subway demand in the vicinity of the Project Area will increase due to long-term background growth as well as developments that could occur pursuant to existing zoning. The future conditions' subway volumes reflect annual background growth rates of 0.25 percent per year for the 2019 through 2024 period and 0.125 percent for the 2025 through 2035 period (recommended in the *CEQR Technical Manual*). These background growth rates are applied to account for discrete smaller projects and as-of-right developments and general increases in travel demand not attributable to specific development projects. In addition, in order to forecast future transit conditions, numerous No Build developments with a quarter-mile of the project area (as listed in Chapter 2, "Land Use, Zoning, and Public Policy") were considered for future conditions. These demands are considered under the future conditions and are consistent with CEQR guidance. Also, Chapter 21, "Mitigation," in the FEIS discusses the subway line haul mitigation measures, including additional southbound G trains during the AM peak hour and northbound G trains during the PM peak hour to mitigate potential impacts. Proposed measures are subject to final review and approval by NYCT.

PARKING

Comment 224: The project generates demand for 6,086 parking spaces, yet only 3,236 are proposed on-site. This 2,850-space deficit will overwhelm on-street parking, increasing traffic, double parking, and neighborhood frustration—particularly in evenings and weekends. The DEIS dismisses this impact by claiming alternative transportation is available, but offers no real analysis of how these drivers will shift modes. This violates CEQR's mandate to account for secondary impacts like traffic spillover and curbside congestion. The DEIS must include realistic mitigation or parking demand management strategies. (LICC-HPCC_001)

Response 224: The EIS evaluates the potential for the RWCDS associated with the Proposed Actions to result in significant adverse impacts to all transportation modes in the Project Area, including Parking. As discussed under Chapter 14, "Transportation," the parking demand generated by new development was evaluated and it concluded that the is well-served by alternate transportation options, and any potential parking shortfalls associated with the Proposed Actions would not be considered significant as the

majority of the Project Area is located within Parking Zone 2 under the *CEQR Technical Manual*.

Comment 225: Make the bicycle lanes wider on 23rd Street by removing parked cars from the street. Currently in most parts of the street, bicycle lanes are shared with driving roads that some bicycle lists use sidewalks. (Fowler_006)

Response 225: Modifications of the existing bike lanes and bike infrastructure are beyond the purview of CEQR.

PEDESTRIANS

Comment 226: Implement a comprehensive Vision Zero strategy tailored to LIC, including raised crosswalks, curb extensions, protected bike lanes, pedestrian refuge islands, and redesigned intersections to reduce injuries and fatalities. (CB2_Queens_002)

Response 226: The EIS evaluates the potential for the RWCDS associated with the Proposed Actions to result in significant adverse impacts to all transportation modes in the Project Area. This includes assessing pedestrian safety, specifically at high-crash and Vision Zero Priority analysis locations. The EIS identified high crash locations which are defined as those along a Vision Zero priority intersection or locations where five or more pedestrian/bicyclist injury crashes have occurred in any consecutive 12 months of the most recent three-year period for which data are available. A review of the crash data identified 12 intersections within a quarter-mile of the Project Area as high crash locations. Of the 12 intersections, 6 intersections were selected for a qualitative assessment for street user safety. Proposed improvements to street lighting and modifications to signal timing plans and pavement markings are recommended in the EIS.

TRAFFIC

Comment 227: The DEIS identifies significant adverse traffic impacts at 44 intersections during peak hours— including 72 lane groups impacted in the weekday PM peak. Many of these are Vision Zero priority corridors and intersections already experiencing frequent crashes. The DEIS proposes limited mitigation, despite forecasting that the project will add over 2,600 new vehicle trips during the PM peak. It fails to explain how safety will be preserved or how congestion will be managed beyond vague signal timing changes.

This violates CEQR's requirements to meaningfully mitigate significant adverse impacts and ensure safe operations for all users. (LICC-HPCC_001)

Response 227: A comprehensive analysis of potential impacts on the traffic network was undertaken for the EIS. This analysis was performed in accordance with the 2021 *CEQR Technical Manual* and are presented in Chapter 14 ("Transportation"). Existing data was collected to establish existing traffic conditions. The future conditions analysis, including the potential for significant adverse impacts and associated mitigation measures (discussed in Chapter 21, "Mitigation"), reflects the projected traffic demands expected from the build-out of the Proposed Actions over the next 10 years. The traffic analyses and recommended mitigations in the EIS were reviewed and coordinated with DOT. Proposed mitigation measures included signal timing changes, installation of new traffic signals or all-way stop controls, and modifications to lane striping and curbside parking regulations. Assuming all the proposed mitigation measures are implemented, significant adverse impacts would be fully mitigated at 15, 18, 16, and 18 intersections during the weekday AM, midday, PM, and Saturday periods, respectively. In addition, the EIS identified high crash locations which are defined as those along a Vision Zero priority intersection or locations where five or more pedestrian/bicyclist injury crashes have occurred in any consecutive 12 months of the most recent three-year period for which data are available. A review of the crash data identified 12 intersections within a quarter-mile of the Project Area as high crash locations. Of the 12 intersections, 6 intersections were selected for a qualitative assessment and discussed in Chapter 14, "Transportation."

TRANSIT

Comment 228: Partner with the MTA, and formalize in a transit coordination plan, to expand service on the 7, E, G, M, F, N, and W subway lines, including increased frequency and accessibility/circulation upgrades at nearby stations. This should be formalized in a transit coordination plan. (CB2_Queens_002)

Fund increased service and frequency on affected bus and subway lines (N, W, E, F, M, R, 7 trains), commensurate with the projected increase in population. (CB1_Queens_150)

MTA and DOT should fund capital improvements that address capacity and access constraints at the 39th Avenue and Queens

Plaza stations. The N and W trains specifically suffer from capacity issues in Astoria since there is limited room to store extra trains. (CB1_Queens_150)

Response 228: A comprehensive analysis of potential impacts on transit systems, including buses, subways, and related pedestrian elements, was undertaken for the DEIS. These analyses were performed in accordance with the 2021 *CEQR Technical Manual* and are presented in Chapter 14, "Transportation." Existing data provided by Metropolitan Transit Authority-New York City Transit (NYCT) was used. The future conditions analysis, including the potential for significant adverse impacts and associated mitigation measures (discussed in Chapter 21, "Mitigation"), reflects the projected transit demands expected from the build-out of the Proposed Actions over the next 10 years. The subway analyses and recommended mitigation in the EIS were reviewed and coordinated with MTA-NYCT. Proposed measures are subject to final review and approval by NYCT.

Comment 229: Expand local bus service, express buses to Manhattan, and ferry service. Create dedicated bus lanes along major corridors, improving last-mile access and reducing commute times. (CB2_Queens_002)

Provide express bus service for the Queensbridge area. (CB1_Queens_150)

Response 229: A comprehensive analysis of potential impacts on transit systems, including bus line haul, was undertaken for the EIS. These analyses were performed in accordance with the 2021 *CEQR Technical Manual* and are presented in Chapter 14 ("Transportation"). Chapter 21 ("Mitigation") of the EIS presents measures to address one bus line haul impact expected to result from the Proposed Actions. It should be noted that modifications of the existing bus routes and bus infrastructure are not within the purview of CEQR.

Comment 230: Has the proposed tunnel crossover for the F and M trains which are scheduled to begin in December examined in the DEIS as the change was recently announced?

Response 230: DCP, as lead agency, consulted with NYCT and determined that updates to the analysis based on the future change in F and M train operations were not warranted and are, as a result, not included in the DEIS or the FEIS.

AIR QUALITY

MOBILE

Comment 231: The DEIS admits that $PM_{2.5}$ and carbon monoxide will exceed both NAAQS and CEQR *de minimis* thresholds at Vernon Boulevard and 46th Avenue—yet claims future mitigation "may" fix it. This is unacceptable. The project would increase 8-hour CO concentrations 19-fold at this intersection, breaching federal health standards. The DEIS fails to present guaranteed mitigations or alternative scenarios that reduce traffic. Under CEQR, this is a textbook significant adverse impact that must be addressed now—not deferred to a Final EIS that may never deliver binding solutions. (LICC-HPCC_001)

Response 231: Comment noted. The FEIS has been updated with refinements to the traffic, mitigation and air quality analysis. The additional analysis conducted between DEIS and FEIS did not eliminate the impacts relative to $PM_{2.5}$ and the annual *de minimis* threshold. Nevertheless, the traffic mitigation measures presented in the DEIS demonstrate that there would no significant adverse air quality impacts from the Proposed Actions due to mobile sources with respect to CO and $PM_{2.5}$ National Ambient Air Quality Standards, and CO *de minimis* thresholds. Therefore, no significant adverse impacts on public health impacts are predicted.

STATIONARY

Comment 232: The DEIS proposes (E) Designations for 57 development sites to "avoid" adverse air quality impacts from fossil fuel emissions and nearby industrial uses. But these designations don't guarantee mitigation—they just defer responsibility to future DEP/OER reviews. There's no explanation of enforcement, no timeline for compliance, and no analysis of what happens if DEP capacity lags behind massive buildout. The scale of this rezoning requires enforceable, up-front mitigation—blanket (E) Designations across nearly all sites suggest the air quality impacts are too severe to manage through standard procedures. (LICC-HPCC_001)

Response 232: The requirements identified in the DEIS will be enforced via (E) Designations or Land Disposition Agreements. Developments subject to an (E) Designations will be required to demonstrate that the Air Quality requirements will be met in order to obtain a DOB permit to construct and certificate of occupancy.

Comment 233: The DEIS identifies over 40 facilities emitting volatile organic compounds (VOCs), formaldehyde, and phthalates—many near projected housing. While it admits formaldehyde levels exceed health risk thresholds at several sites, it claims cumulative cancer risks are "acceptable" without presenting detailed risk assessments per DEC DAR-1 standards. This dismissive treatment of clustered auto body shops and manufacturing sources near DACs shows a dangerous gap in cumulative risk modeling, violating CEQR's requirement to evaluate and mitigate cumulative health impacts. (LICC-HPCC_001)

Response 233: The air quality analysis in Chapter 15, "Air Quality," of the EIS presents a very conservative assessment of potential cumulative effects from industrial sources. Although Table 15-23 the DEIS discloses on pollutants that were found to exceed NYSDEC established thresholds for formaldehyde and other pollutants at certain development sites, the DEIS includes proposed restrictions for the affected sites which would prevent development from occurring unless certain conditions are met, include a determination that the source(s) of emissions are no longer present see Table H-3 of Appendix H.

Comment 234: The DEIS claims PM2.5 emissions from large garages (e.g., Site 63: 801 spaces) fall below *de minimis* thresholds—but 24-hour $PM_{2.5}$ increments from these garages still approach 1.32 µg/m³, which is over 15 percent of the NAAQS. This is a meaningful burden in communities already overexposed to air pollution. The DEIS provides no discussion of air filtration requirements, garage vent placement, or cumulative exposure alongside traffic-related emissions. CEQR requires these elements in neighborhoods with known vulnerability. The omission must be rectified with a complete exposure risk analysis. (LICC-HPCC_001)

Response 234: The analysis presented in the DEIS for evaluation of potential air quality impacts associated with proposed parking facilities utilized the procedures outlined in the *CEQR Technical Manual* to predict and evaluate the potential air quality impacts. The procedure does account for potential cumulative effects of the garage and the effects from background concentrations and emissions from adjacent roadway traffic. Chapter 15, "Air Quality," of the FEIS has been updated to clarify this.

Comment 235: The DEIS assumes fossil fuel heating systems across the entire rezoning area—even beyond the 2028 gas ban imposed by Local

Law 154. This locks in long-term pollution and contradicts the City's own building decarbonization mandates. For 36 sites, the DEIS admits full compliance with CEQR thresholds is impossible unless electric heat or stack retrofits are forced later. The DEIS should model a fully electrified heating scenario consistent with NYC law and disclose public health benefits from reduced NOx and $PM_{2.5}$. Anything less undermines both CEQR and local climate goals. (LICC-HPCC_001)

Response 235: Since the requirements of Local Law 154 of 2021 are being phased in over time, some development may still incorporate fossil fuels. The DEIS presents a very conservative assessment of potential air quality effects associated with heating and hot water systems to ensure that there are no significant adverse air quality impacts associated with fossil fuel fired heating and hot water systems. However, it is understood that developers will be required to comply with the provisions of the Local Law.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Comment 236: The DEIS claims consistency with NYC's net-zero targets while projecting 148,457 metric tons of CO_2e annually. This is a contradiction. Despite citing LL97 and LL154, the DEIS allows fossil fuel infrastructure in 13 buildings, delaying electrification and locking in emissions. The document should model full compliance with LL154 and LL97 across all sites, disclose which parcels will meet post-2028 standards, and show how total emissions will decline to net-zero by 2050. Anything less fails the *CEQR Technical Manual*'s requirement for demonstrating consistency with PlaNYC, OneNYC, and LL97 emissions trajectories. (LICC-HPCC_001)

Response 236: The Reasonable Worst-Case Development Scenario (RWCDS) expected under the Proposed Actions identifies development sites that are anticipated to be developed. As described in Chapter 20, "Construction," of the DEIS, a conceptual construction phasing and schedule for the RWCDS was prepared for analysis purposes by DCP to illustrate how development could proceed through 2035. Because the projected development sites in the rezoning area are predominantly in private ownership, the timing of the development of those sites is unknown. As such, the RWCDS presented does not describe which of the sites would be developed first to assume a particular sequence of development and it is not possible to determine the number of sites that would be developed before the relevant deadlines as described in Local Law 154 of 2021. Market

and site conditions would ultimately determine the sequence of construction of developments.

Therefore, the operational GHG emissions represent the maximum potential emissions under the RWCDS assuming any individual projected development site would be constructed ahead of the relevant deadlines under Loca Law 154 of 2021 and allowed to utilize fossil fuel in the 2035 analysis year. This results in a conservative estimate of GHG emissions for the 2035 analysis year. While overall emissions are projected to be within the carbon intensity limits at the time of the analysis year (established by Local Law 97 of 2019) by incorporating the energy efficiency requirements of the New York City Energy Conservation Code (2020 NYCECC), project development sites would be required to meet future carbon intensity limits beyond 2039. This may include early electrification at the time of construction, performing future retrofits, or incorporation of additional emission reduction measures.

Comment 237: Construction emissions—including embedded carbon building components in concrete, steel, and aluminum—are omitted, though the DEIS admits they could equal 5–10 years of operational emissions. That's up to 1.5 million metric tons of CO_2e ignored. CEQR encourages accounting for lifecycle emissions, especially for large rezonings. With 54 sites spanning decades of buildout, this omission prevents an accurate assessment of climate impacts. The DEIS must include modeled construction emissions or justify their exclusion under a carbon budget framework consistent with CLCPA and LL97 goals. (LICC-HPCC_001)

Response 237: The Reasonable Worst-Case Development Scenario (RWCDS) expected under the Proposed Actions identifies development sites that are anticipated to be developed. Since the Proposed Actions would involve zoning changes that would predominantly affect privately controlled properties, decisions regarding construction for projected development sites, would be made by developers under the building code requirements in effect at the time. Consequently, specific decisions regarding construction cannot be affected by the City within the scope of the Proposed Actions.

Comment 238: Aside from ignoring storm surge, the Draft EIS admits that by 2100 all sites will fall within projected flood zones and that two-thirds are already in current 1 percent or 0.2 percent annual chance flood plains. Yet it offers no enforceable resilience strategy for private

development. Stating that “resilience is not practicable” for private parcels fails CEQR's obligation to assess reasonably foreseeable future conditions. The Draft EIS must describe enforceable design standards or mitigation measures to ensure buildings withstand the best available 2100 sea level rise projections, which were issued in 2024 by the New York Panel on Climate Change, and must include a phasing plan for flood protection. (LICC-HPCC_001)

Response 238: Any building or structure within the current 1 percent annual chance floodplain would be designed and constructed in accordance with Appendix G of the New York City Building Code, Flood-Resistant Construction. The proposed buildings at these sites will be required to have design flood elevations (DFEs) of at least +16 feet NAVD88 or +17 feet NAVD88. Residential units would need to be located at or above the DFE. Because the projected BFEs by the end of the century under the “High” scenario of sea level rise would be at +17 feet NAVD88 and +18 feet NAVD88, some of the DFEs could be below the BFE in the future. Other uses and critical infrastructure such as electrical equipment, plumbing, and heating and cooling systems should be located above the DFE, or otherwise dry floodproofed (fully sealed or protected from flood waters). New developments outside of the current 1 percent annual chance floodplain would not be required to be built in accordance with Appendix G of the New York City Building Code, but the 2021 Zoning for Coastal Flood Resiliency text amendment encourages those sites to plan for future flood risk.

Additionally, the Proposed Actions would result in a new resilient waterfront by raising the grade of the waterfront in connection with the construction of mixed-use developments, providing additional flood protections to inland developments within the Project Area consistent with the City’s resiliency goals and the local community’s Vision Plan for Resiliency. This would include creation of a continuous raised shoreline that would with a mix of hard infrastructure as well as natural features such as native coastal plantings to provide flood protection and erosion control.

The FEIS has been revised to reflect this information. Further details describing proposed flood mitigation measures can be found in Appendix C, “Waterfront Redevelopment Plan.”

Comment 239: Vehicle-related emissions account for 63 percent of total projected GHGs (96,218 metric tons), yet the DEIS uses outdated

assumptions that ignore electrification trends mandated by state law. It fails to model modal shifts or transit investments and assumes no vehicle electrification—even though NYS bans new internal combustion engine car sales by 2035. The DEIS must incorporate accelerated electrification and congestion pricing effects, or else its mobile source GHG estimates are inflated, misleading, and violate CEQR's requirement to model foreseeable regulatory changes. (LICC-HPCC_001)

Response 239: The vehicle-related GHG emissions were based on project-generated vehicle trip generation consistent with the transportation analyses performed in Chapter 14, "Transportation." While fleetwide average vehicle emission factors are anticipated to improve in the future due to New York State regulations, the magnitude of these reductions are not known at this time. Consequently, the GHG emissions analysis conservatively does not include these improvements, consistent with the guidance of the *CEQR Technical Manual*.

Comment 240: While the DEIS references PlaNYC and LL97, it provides no mitigation plan for the 52,239 metric tons of GHGs from building operations or 96,218 metric tons from vehicles. CEQR requires projects exceeding 350,000 SF to show consistency with NYC GHG goals—but simply citing LL97 and Local Law 154 without detailing implementation is not sufficient. The DEIS must identify specific on-site measures: renewable energy procurement, demand response programs, EV charging mandates, building electrification timelines, and materials decarbonization. Otherwise, this chapter lacks enforceable mechanisms and fails to meet CEQR thresholds for consistency. (LICC-HPCC_001)

Response 240: The Reasonable Worst-Case Development Scenario (RWCDS) expected under the Proposed Actions identifies development sites that are anticipated to be developed. Because the projected development sites in the rezoning area are predominantly in private ownership, the timing, design, and energy efficiency measures of the development of those sites are unknown. However, individual development sites would be required to demonstrate that the building design would be in compliance with the City's sustainability regulations that are designed to ensure carbon emission and building energy consumption are reduced. This includes obtaining approvals from the New York City Department of Building that the proposed building would meet the rooftop solar/green roof requirements under Local Laws 92/94 of 2019, the fossil fuel requirements under Local Law 154 of 2021,

and the energy performance requirements under the 2020 New York City Energy Conservative Code (NYCECC).

Following construction, developments would also be requirement to demonstrate compliance with the carbon intensity limits for buildings established under Local Law 97 of 2019 each year. While overall emissions are projected to be within the carbon intensity limits at the time of the analysis year by incorporating the energy efficiency requirements of the New York City Energy Conservation Code (2020 NYCECC), project development sites would be required to meet future carbon intensity limits beyond 2039. This may include early electrification at the time of construction, performing future retrofits, or incorporation of additional emission reduction measures. However, specific emission reduction measures that would be incorporated into projected development sites would be ultimately determined by future market and site conditions.

Similarly, the emission factors for fleetwide average vehicles are anticipated to improve in the future due to New York State regulations and New York City regulations on inclusion of electric vehicle charging infrastructure for parking facilities. However, the magnitude of these reductions are not known at this time and would not be affected by the Proposed Actions.

Comment 241: The DEIS acknowledges long-term consumption of "energy resources," including fossil fuels, yet does not model what proportion of proposed buildings will be gas-powered, or how many will be subject to retrofits under Local Law 97. Buildings constructed today without electrification will lock in fossil fuel use through 2050 or later—directly contradicting the CLCPA's 85 percent emissions reduction mandate. This is a textbook example of irretrievable carbon lock-in, and CEQR requires it be quantified and disclosed. The DEIS instead evades this accountability, treating gas infrastructure as standard and irreversible without alternatives. (LICC-HPCC_001)

Response 241: The Reasonable Worst-Case Development Scenario (RWCDS) expected under the Proposed Actions identifies development sites that are anticipated to be developed. Because the projected development sites in the rezoning area are predominantly in private ownership, the timing, design, and energy efficiency measures of the development of those sites are unknown. However, individual development sites would be required to demonstrate that the building design would be in compliance with

the City's sustainability regulations that are designed to ensure carbon emission and building energy consumption are reduced. This includes obtaining approvals from the New York City Department of Building that the proposed building would meet the rooftop solar/green roof requirements under Local Laws 92/94 of 2019, the fossil fuel requirements under Local Law 154 of 2021, and the energy performance requirements under the 2020 New York City Energy Conservative Code (NYCECC). Furthermore, developments would also be required to demonstrate compliance with the carbon intensity limits for buildings established under Local Law 97 of 2019 each year.

Consequently, the RWCDS under the Proposed Actions would be consistent with the strategies identified by New York State's Scoping Plan to achieve the statewide emission limits for 2030 and 2050 (adopted by DEC under 6 NYCRR Part 496). Specifically, by meeting New York City's regulations, the Proposed Actions would result in development that meets New York State's strategies of developed under Advanced Codes for Highly Efficient, Zero-Emission, and Resilient New Construction (Strategy B1), Require Energy Benchmarking and Disclosure (Strategy B3), Advance a Managed and Just Transition from Reliance on Hydrofluorocarbon Use (Strategy B12), Local Energy Policies (Strategy LG2), and Mobility-Oriented Development (Strategy T6).

NOISE

Comment 242: The DEIS relies heavily on "proportional modeling" to estimate future noise levels based on current traffic conditions and projected volume increases. While CEQR allows this method, it oversimplifies complex urban noise interactions, ignores localized conditions, and lacks real-world calibration. Particularly in a neighborhood with overlapping sources like playgrounds, elevated rail, and freight corridors, this approach underestimates cumulative exposure. A more rigorous modeling technique—such as dynamic 3D acoustic simulations or field-calibrated multisource models—should be employed to reflect true impacts and meet the intent of CEQR's technical standards. (LICC-HPCC_001)

Response 242: Consistent with *CEQR Technical Manual* guidance, the DEIS uses proportional modeling for estimates of future noise levels where vehicular traffic is the dominant source of noise. However, it is not the only method used to project noise levels, as the DEIS noise analysis incorporates guidance from the Federal Transit Administration to estimate noise from railway sources and CEQR's

playground noise analysis guidance to estimate noise from playground use. The combination of these methods along with measured existing condition noise levels that capture all existing noise sources allows for accurate and conservative projections of cumulative future noise levels. Furthermore, it is not accurate that proportional modeling oversimplifies complex urban noise interactions, ignores localized conditions, and lacks real-world calibration. On the contrary, since proportional modeling is based on measurements of existing condition noise levels, it does indeed account for localized conditions and the real-world urban noise environment, while also conservatively estimating future increases in noise level that could occur as a result of vehicular traffic introduced by the Proposed Actions.

Comment 243: Noise levels at several receptor locations—such as Locations 17 through 20—already fall within the "Clearly Unacceptable" CEQR category (Ldn > 75 dBA). Despite this, the DEIS proposes only passive attenuation (up to 44 dBA window-wall insulation) and alternate ventilation. This fails to address impacts in open spaces and public right-of-way areas where residents will still be exposed. The plan lacks any source-based noise mitigation (e.g., traffic rerouting, speed calming, barriers). Without addressing outdoor exposure, these measures fall short of CEQR's mandate to prevent or minimize environmental harm. (LICC-HPCC_001)

Response 243: As the Proposed Actions would not newly introduce public open spaces, addressing noise exposure from existing sources at public open spaces or right-of-way areas is not in the purview of the EIS noise analysis. Pursuant to *CEQR Technical Manual* guidance, existing noise exposure was addressed for noise-sensitive uses newly introduced by the Proposed Actions by the requirement of window/wall attenuation and alternate means of ventilation. Further, the dominant sources of noise at the locations where existing condition measurements identified as experiencing "clearly unacceptable" noise levels are elevated railways or vehicular traffic on the Queensboro Bridge, none of which would be addressed by traffic rerouting or speed calming, and for which barriers are not within the purview of the Proposed Actions.

Comment 244: Projected Development Site 1 lies just 55 feet from PS312Q's playground. The DEIS calculates cumulative playground and traffic noise levels reaching 68–69 dBA (L10), which exceeds CEQR's acceptable thresholds for noise-sensitive uses. Yet the document offers no operational or design mitigation—like sound-absorbing

fencing, staggered play schedules, or vegetative buffers—to reduce exposure. This omission disregards children's heightened sensitivity to noise and violates CEQR's directive to "avoid or minimize" impacts on vulnerable populations. Further, playgrounds are public amenities, and their degradation is a clear adverse community impact. (LICC-HPCC_001)

Response 244: It is not accurate that the cumulative noise levels calculated at Projected Development Site 1 exceed CEQR's acceptable thresholds for noise-sensitive uses; rather, the maximum projected L10 noise level of 69.6 dBA is considered "marginally acceptable" for a residential or community facility use according to CEQR noise exposure guidance. Further, the noise exposure at this location results almost entirely from existing sources (per DEIS table 17-8, the Proposed Actions contribute less than 1 dBA to With-Action total noise levels at this location). As such, not only would it be unnecessary to institute noise control at the playground source, it is also not within the purview of the Proposed Actions to do so.

Comment 245: The DEIS proposes to place an (E) Designation for noise on all non-City-owned projected development sites. However, several of the projected development sites, including sites 63 and 64, are not indicated to require any noise attenuation (see DEIS Table 17-11). Plaxall requests that the FEIS target noise (E) Designations to those projected development sites actually requiring attenuation, to avoid the need for unnecessary process with OER for other sites. (Hare_Plaxall_055)

Response 245: The (E) Designation language in the FEIS has been updated to exclude development sites not requiring a specific level of attenuation.

MOBILE

Comment 246: The DEIS acknowledges that the Proposed Actions could cause significant adverse noise impacts at Monitoring Locations 5, 8, 13, and 16, where modeled noise increases exceed the 3 dBA CEQR threshold. However, the document defers full analysis to the Final EIS without providing mitigation strategies, impact zones, or health implications for affected residents. This delay undermines CEQR's requirement for a thorough evaluation of environmental impacts before project approval. The DEIS must include full impact assessments and proposed mitigation now—not later—to ensure

transparency, community protection, and regulatory compliance. (LICC-HPCC_001)

Response 246: Impact zones are discussed in Chapter 17, "Noise," and shown numerically in Table 17-8, impacts on public health are discussed in Chapter 18, "Public Health," and potential mitigation is discussed in Chapter 21, "Mitigation," Section H., "Noise."

PUBLIC HEALTH

Comment 247: The DEIS does not assess cumulative exposure risk from clustered contaminated sites or proximity to sensitive populations. CEQR requires evaluating whether multiple adjacent brownfield parcels such as those along the East River waterfront and Anable Basin might create combined exposure risks—especially for vulnerable groups such as children, seniors, and environmental justice communities. With over 20 BCP (Brownfield Cleanup Program) sites and hundreds of recorded spills, the DEIS must model cumulative risks from soil vapor intrusion, construction-phase dust, and groundwater plume migration. Its failure to address these overlapping hazards violates CEQR's environmental justice and public health obligations. (LICC-HPCC_001)

Response 247: According to the *CEQR Technical Manual*, "the goal of the hazardous materials evaluation is to determine whether the proposed project may increase the exposure of people or the environment to hazardous materials, and, if so, whether this increased exposure would result in potential significant public health or environmental impacts. If significant adverse impacts are identified, CEQR requires that the impacts be disclosed and mitigated or avoided to the greatest extent practicable" (2021 City Environmental Quality Review (CEQR) Technical Manual, Chapter 12). Modeling cumulative risks is outside the scope of CEQR. The implementation of the (E) Designation program on the sites in the project area will investigate and mitigate the potential for exposure of people and the environment to the potential hazardous materials that are currently present beneath the project sites including soil vapor intrusion, construction-phase dust, and groundwater plume migration, if any.

AIR QUALITY

Comment 248: The DEIS admits that $PM_{2.5}$ concentrations will exceed annual CEQR *de minimis* thresholds at all four tested intersections—

including a total $PM_{2.5}$ concentration of 8.44 µg/m³, dangerously close to the federal health standard of 9 µg/m³. This level of pollution can aggravate asthma, heart disease, and stroke, especially in children and seniors. Yet the DEIS dismisses this risk based on speculative "future modeling." CEQR requires actual mitigation, not wishful projections. If $PM_{2.5}$ exceedances remain, this is a significant adverse public health impact requiring site-specific action—especially in areas already designated as Disadvantaged Communities. (LICC-HPCC_001)

Response 248: As presented in Chapter 28, "Public Health," with the proposed mitigation measures in place, at all analyzed intersections, concentrations would not exceed the CO and PM2.5 NAAQS. Therefore, the exceedances of the PM2.5 *de minimis* criterion on an annual basis would not constitute a significant adverse impact on public health.

Comment 249: The DEIS uses "anticipated future updates" and "grid modeling refinements" to claim $PM_{2.5}$ levels will eventually fall below thresholds—but provides no enforceable mitigation now. This contradicts CEQR's core principle that impacts must be identified and mitigated based on the best available information at the time of the Draft EIS. The claim that things will fix themselves by the Final EIS is not mitigation—it's deferral. Communities deserve protective action now, not faith in future assumptions. The DEIS must provide concrete mitigations or acknowledge that public health standards are currently being breached. (LICC-HPCC_001)

Response 249: As stated in the DEIS, the traffic mitigation measures identified are necessary to avoid a potential significant adverse impact on air quality. The FEIS has been updated to provide further refinements to the transportation, mitigation and air quality analyses.

CONSTRUCTION

Comment 250: The DEIS confirms that construction at multiple sites will generate noise up to 100 dBA— above the threshold for hearing loss and other health risks. While it claims window insulation will reduce indoor exposure, this assumes windows stay shut and ignores impacts on public parks, sidewalks, and schools. CEQR acknowledges that short-term, high-intensity noise can cause cardiovascular stress and interfere with learning. The DEIS offers no community health protections, school coordination plans, or

interim air and noise shelters. Without those, this is a public health failure—not just a nuisance. (LICC-HPCC_001)

Response 250: As discussed in Chapter 18, Construction," although the thresholds for significant adverse impacts are predicted to be exceeded at certain locations during construction, the magnitude and duration of the construction noise exceedances would not constitute a significant adverse public health impact.

NOISE

Comment 251: Four locations are projected to experience noise increases of up to 3.6 dBA from new traffic. The DEIS admits this breaches CEQR noise criteria, but waves it off as "not harmful" to public health. This is misleading. CEQR defines these noise thresholds as protective of health and quality of life. Long-term exposure, even to moderate levels, increases the risk of hypertension, heart disease, and poor child development. The DEIS must not redefine these impacts out of existence—it must treat exceedances as real risks, especially for seniors, children, and other vulnerable populations. (LICC-HPCC_001)

Response 251: The DEIS draws the distinction between noise impact thresholds based on quality-of-life considerations and criteria for public health considerations. Noise level increases of this magnitude would be considered "barely perceptible", and interior noise level increases would be equivalent or less. Neither the exterior nor interior noise levels predicted at these receptors would rise to the level of a Public Health impact according to CEQR impact criteria. The claim that long term exposure to moderate noise levels carries public health risks is also not supported by CEQR public health guidance.

NEIGHBORHOOD CHARACTER

Comment 252: Losing almost half of the existing industrial space in LIC devalues and destabilizes the existing ecosystem of manufacturing, maker, artists, and small retail business thriving in this neighborhood known throughout NYC for its vibrancy. (LICC-HPCC_001)

Response 252: Many industrial buildings in the Long Island City IBZ would remain with the Proposed Actions. Further, the Proposed Actions are intended to promote light manufacturing businesses and other commercial uses, including creative industries, which would reinforce the neighborhood's industrial character, as concluded in Chapter 19, "Neighborhood Character."

Comment 253: The DEIS downplays the demolition of five State/National Register-eligible buildings, claiming their loss won't alter neighborhood character. But these buildings reflect the industrial, working-class legacy of Long Island City—the very identity cited as a defining neighborhood feature. Destroying the New York & Queens Electric Light building and other historic structures without alternatives or adaptive reuse strategies contradicts CEQR's mandate to assess contextual changes. The character of a neighborhood isn't just preserved landmarks—it's also the everyday architectural fabric. These losses amount to an erasure of place. (LICC-HPCC_001)

Response 253: The DEIS acknowledges the demolition of historic buildings in the Long Island City IBZ, but concludes that the demolition of these buildings would not affect neighborhood character because the Proposed Actions are projected to result in the preservation of industrial use, and in some cases, the adaptive reuse of industrial buildings. In addition, the manufacturing zoning and industrial buildings in the portion of the IBZ in the secondary study area, north of the primary study area, will remain in place. In addition, the manufacturing zoning and industrial buildings in the portion of the IBZ in the secondary study area, north of the primary study area, will remain in place. The assessment concludes that the demolition of a subset of contributing industrial buildings would not affect neighborhood character.

Comment 254: The DEIS claims six new acres of open space enhance neighborhood character—but the resident-to-open-space ratio plummets by nearly 19 percent, particularly for active open space. This contradicts CEQR's standards, which treat open space as a defining character element when access falls below city guidelines. New park space located in high-traffic, polluted, or shadowed areas does not meaningfully offset the increased demand from 14,699 new residents. This is not neighborhood enhancement—it's overburdening already stretched infrastructure, degrading livability, and violating CEQR's character threshold for open space scarcity. (LICC-HPCC_001)

Response 254: The Proposed Actions would result in new open space, including waterfront open space, which would provide benefits to residents of Long Island City. The new open space is expected to result in benefits to neighborhood character. Chapter 5, "Open Space," discloses a significant adverse impact to open space due to the added residential demand placed on active and passive open

spaces in an area that has limited available open space resources Mitigation is discussed din Chapter 21, “Mitigation.”

Comment 255: The DEIS admits to significant transit, sidewalk, and traffic impacts—44 intersections, 25 sidewalks, multiple subway stations—but dismisses these because “transportation is not a defining feature of neighborhood character.” That’s false. In transit-reliant LIC, access and circulation are central to daily life, walkability, and identity. Overcrowded subways, blocked sidewalks, and ferry spillover into Gantry Park directly affect quality of life and spatial experience. CEQR allows for transportation to influence character in high-density, transit-rich neighborhoods. The DEIS cannot erase infrastructure failure by declaring it irrelevant to community life. (LICC-HPCC_001)

Response 255: According to the DEIS, defining features of Long Island City’s character include its waterfront, including iconic landmarks such as the Queensboro Bridge and Pepsi sign, arts and culture, and its dynamic and ever changing neighborhoods. The New York City transit system, including subways and subway stations, and the City’s sidewalks, are an overarching element of New York City’s built fabric environment, and transit and sidewalk conditions in Long Island City are not dissimilar to other dense areas of New York City, including the Midtown Manhattan and Downtown Brooklyn Central Business Districts and the neighborhoods adjacent to them. However, the neighborhood’s subway station, street intersections, and sidewalks are not the primary defining elements of the neighborhood‘s character. Transit and pedestrian conditions are analyzed in detail in Chapter 14. Mitigation for significant adverse transportation impacts are discussed in Chapter 21, “Mitigation.”

Comment 256: The DEIS praises “architecturally contextual” new towers but provides no visual analysis of how massive towers—up to 1,175 feet—will dwarf historic districts, obscure public view corridors, and overwhelm waterfront identity. CEQR requires visual impact analysis where scale and setting are at risk. LIC’s character is defined by dynamic but human-scaled transitions between industrial, cultural, and residential areas. High-rise towers surrounded by shadows, parking podiums, and glass facades represent radical change—not continuity. The DEIS must show streetscape renderings and section drawings that clarify what residents will actually experience. (LICC-HPCC_001)

Response 256: The assessment of neighborhood character is based on other analyses in the DEIS, including the urban design analysis in Chapter 8, "Urban Design and Visual Resources." Chapter 8 includes 21 comparison massings (Figures 8-55 through 8-75) that depict existing, No Action and With Action views from the pedestrian vantage point.

Comment 257: The DEIS praises LIC's arts and culture identity—MoMA PS1, Silvercup Studios, sculpture centers—but proposes rezoning that accelerates displacement of low-rent industrial studios and creative uses. While it claims to "protect" arts space, there are no zoning guarantees, preservation incentives, or binding mechanisms. CEQR requires alignment between project claims and real-world outcomes. Without firm protections, the creative community that defines LIC's identity will be priced out by speculative residential towers and generic commercial space. This contradiction between narrative and land use must be addressed before certification. (LICC-HPCC_001)

Response 257: The Proposed Actions would result in residential development, including affordable housing, that artists may choose to reside in. Additionally, the zoning changes would create opportunities for creative industries to locate to Long Island City. It would also allow existing businesses to expand.

Comment 258: Maintain the character of the Industrial Business Zone (IBZ) by avoiding upzoning that incentivizes speculative development at the cost of existing businesses. New development should complement—not replace—LIC's industrial, artisan, and creative communities. (CB2_Queens_002)

Response 258: Chapter 19 of the DEIS, "Neighborhood Character," concludes that the increase in density and the expansion of allowable non-residential uses in the IBZ supports public policies to foster industrial retention, new and innovative industries, and promote job growth. The Proposed Actions would protect the industrial uses in the IBZ and maintain the dynamic character of Long Island City.

CONSTRUCTION

Comment 259: The DEIS assumes construction will be staggered across 52 projected development sites but fails to specify phasing at a block or neighborhood scale. Many sites may undergo overlapping excavation, pile-driving, and superstructure work over a ten-year

span. This prolonged, cumulative impact on adjacent communities—particularly low-income and rent-stabilized housing near Sites 1, 19, and 63—is not fully assessed. CEQR mandates a detailed analysis of sustained multi-site disruption, especially when it affects sensitive receptors like schools, healthcare facilities, or senior housing. A site-specific phasing map and mitigation strategy must be included now—not deferred to later project stages. (LICC-HPCC_001)

Response 259: As described in DEIS Chapter 20, "Construction," at this time, there are no finalized construction programs or designs for the projected developments. Therefore, for analysis purposes, a conceptual construction phasing and schedule for the Reasonable Worst-Case Development Scenario (RWCDS) expected under the Proposed Actions was prepared by DCP to illustrate how development could proceed through 2035. Figure 20-1 of the DEIS presents the conceptual construction sequencing under the Proposed Actions which the analyses are based on. The conceptual construction schedule conservatively accounts for overlapping construction activities at development sites in proximity to one another to capture the cumulative nature of construction impacts with respect to number of worker vehicles, trucks, and construction equipment at any given time, within reasonable construction scheduling constraints for each of the development sites in the rezoning area.

Comment 260: The proposed development would expose thousands of families [at Queensbridge Houses] to years of hazardous construction conditions, despite already existing poor conditions. (Chaise_RRA_063)

Response 260: Comment noted. As described in DEIS Chapter 20, "Construction," the Proposed Actions have the potential to result in significant adverse construction impacts related to transportation and noise.

AIR QUALITY

Comment 261: The DEIS bases its air quality modeling on representative proxy sites (Sites 1, 19, 20, 22), applying results to the entire project area. This approach ignores actual land use variation and microclimate conditions (e.g., canyon effects near high-rises, proximity to schools or nursing homes). For example, Site 19's high emissions are averaged across sites like 67C and 63A, which are near sensitive receptors but may experience more severe

localized effects. CEQR requires that site-specific and cumulative impacts be fully disclosed and not masked through generalized assumptions. The current modeling approach risks underestimating $PM_{2.5}$ and NO_2 exposure for vulnerable populations. (LICC-HPCC_001)

Response 261: As described in DEIS Chapter 20, "Construction," at this time, there are no finalized construction programs or designs for the projected developments.

NOISE

Comment 262: The DEIS admits significant construction noise impacts, citing receptor sites with 15–20 dBA increases classified as "objectionable" or "very objectionable." However, it offers only general assurances of compliance with the NYC Noise Code and a future Construction Noise Mitigation Plan. This defers actual mitigations like noise curtains, equipment substitution, or community notice protocols. Without defining where and when these plans apply, and how they protect sensitive uses like PS312Q or residential buildings within 50 feet of pile-driving sites, the DEIS fails CEQR's requirement to identify and minimize adverse environmental impacts during the review process. (LICC-HPCC_001)

Response 262: The construction noise analysis in the DEIS conservatively identifies worst-case construction noise levels that may occur and identifies that they may result in "very objectionable" noise level increases and would constitute significant adverse impacts in several locations. It also acknowledges that such adverse impacts could not be completely mitigated and would therefore be unavoidable. However, it is not accurate that noise control measures are addressed only generally. The DEIS construction noise analysis identifies specific source and path control measures that could be implemented throughout all construction under the Proposed Actions. As such, potential impacts were identified in the DEIS, and mitigation measures are identified in Chapter 21, "Mitigation," to minimize them to the extent feasible and practicable.

TRANSPORTATION

Comment 263: The DEIS forecasts 3,276 daily construction workers and 448 daily truck trips at peak (2030 Q3), but downplays congestion by stating traffic would occur "outside normal commuter peaks." However,

peak construction traffic is modeled to occur from 6–7 AM, overlapping with school and early work commutes. The report also admits potential parking shortfalls and lane closures, yet defers details to future DOT-approved Maintenance and Protection of Traffic (MPT) plans. This violates CEQR's directive to fully disclose traffic and parking impacts upfront, especially in mixed-use districts already burdened with congestion and limited curb space. (LICC-HPCC_001)

Response 263: As discussed in Chapter 20, "Construction," potential significant adverse traffic impacts could occur during construction. The impacts would be within the range of impacts identified for the operational traffic in the 2035 build year. The mitigation measures identified in Chapter 21, "Mitigation," for 2035 operational traffic impacts would be similarly effective at mitigating any potential construction traffic impacts. Furthermore, there would be less likelihood of a parking shortfall during the peak construction hours in the cumulative analysis year (2030) than with full build-out of the projected developments in 2035, and any potential shortfall would not be considered significant because the site is served by nearby alternative modes of transportation. Also discussed in Chapter 20, the proposed developments would be subject to various requirements for planning and coordination that is intended to minimize the effects of the construction on each site. This includes, but is not limited to, maintenance and protection of traffic (MPT) plans, which are subject to review and approval by the DOT-OCMC. MPT plans would ensure protection of workers and roadway users, including motorists, pedestrians, cyclists, and any users with special needs for construction activities affecting sidewalks or travel lanes. This would occur as project construction plans are advanced and such plans are based on specific details of construction, rather than the preliminary conceptual plans presented in the EIS.

MITIGATION

COMMUNITY FACILITIES

Comment 264: With up to 4,867 affordable units, the DEIS estimates 681 new young children needing publicly funded child care. This pushes local capacity to 102.7 percent with a deficit of 67 slots—a 27.3 percent increase in demand. Yet the DEIS does not guarantee new providers or funding. Family-based care and hypothetical voucher options are mentioned but not quantified. Under CEQR, a 5

percent increase triggers a significant impact—this is over five times that. Without firm commitments for new public child care capacity, this plan is unbuildable. (LICC-HPCC_001)

Response 264: As described in Chapter 4, "Community Facilities and Services," of the DEIS, per *CEQR Technical Manual* guidelines, family-based early childhood programs and informal care arrangements (which provide additional slots) are conservatively not accounted for in quantitative early childhood programs analysis. As discussed in Chapter 22, "Mitigation," of the DEIS, possible mitigation measures will be developed in consultation with DOE and may include provision of suitable space on-site for a child care center, provision of a suitable location off-site and within a reasonable distance (at a rate affordable to DOE providers), or funding or making program or physical improvements to support adding capacity to existing facilities if determined feasible through consultation with DOE's Division of Early Childhood Education, or providing new early childhood programs within or near the Project Area. These preliminary mitigation measures will be explored between the DEIS and FEIS. Absent the identification and implementation of feasible mitigation measures that would fully mitigate, significant adverse impacts would be unmitigated.

Comment 265: The DEIS admits the plan will cause significant adverse impacts at both the Hunters Point and Long Island City library branches, increasing usage by 79.44 percent and 11.56 percent, respectively. This breaches CEQR thresholds and worsens holdings-per-resident ratios. While a Court Square branch is referenced, it is not funded or open. Residents are told to rely on interlibrary loans instead of being provided adequate services. CEQR mandates that infrastructure must be in place—not merely "anticipated." The DEIS must commit to opening the new branch with expanded staffing, programs, and collections before occupancy occurs. (LICC-HPCC_001)

Response 265: As described in Chapter 4, "Community Facilities and Services," of the DEIS, the Proposed Action are anticipated to result in a significant adverse impact on libraries, though the analysis conservatively does not assume the construction of a future Court Square branch. As discussed in Chapter 22, "Mitigation," of the DEIS, possible mitigation measures will be developed in consultation with Queens Public Libraries and may include the provision of space for a new library of a size and at a location to be determined through additional coordination with QPL and/or improvements to a branch facility to support the branch's

programming and services year-round. These preliminary mitigation measures were explored between the DEIS and FEIS. Absent the identification and implementation of feasible mitigation measures that would fully mitigate, significant adverse impacts would be unmitigated.

Comment 266: The DEIS admits the plan will push elementary schools to 143.8 percent utilization, with a deficit of over 2,000 seats. Yet no new schools are guaranteed, only vague "mitigation options." CEQR mandates specific actions when thresholds are breached—this is not optional. No development should move forward without a fully funded and sited new elementary school. The City cannot claim to support "complete neighborhoods" while knowingly pushing thousands of new families into an already overcrowded school system. The DEIS must provide binding school siting commitments or trigger a formal finding of significant adverse impact. (LICC-HPCC_001)

Response 266: As discussed in Chapter 4, "Community Facilities," the Proposed Actions would result in a significant adverse impact to elementary schools. The feasibility of potential mitigation measures was explored between the publication of the DEIS and the FEIS. As described in Chapter 21, "Mitigation," the City will evaluate the appropriate timing and mix of measures to address increased school enrollment. If additional school capacity continues to be warranted and if new funding is available to address the new need introduced by the Proposed Actions, it will be allocated for the construction of new school(s), the expansion of capacity of existing schools, and/or leasing new school space when the capacity need would occur. DCP will continue to explore these mitigation measures with the SCA and DOE. Additionally, between the publication of the DEIS and the FEIS, the SCA has determined that the community facility space included in Projected Development Site 1 would potentially be an appropriate location for a school and is actively discussing a potential school development with the property owner. In the event that a school is constructed on this site, it would serve to partially mitigate the impacts described above. Absent the identification and implementation of feasible mitigation measures that would fully mitigate, significant adverse impacts would be unmitigated.

OPEN SPACE

Comment 267: A significant loss of existing open space is hidden behind small gains. The Draft EIS claims the project adds 4.38 acres of "waterfront open space"—but buries the fact that open space per resident drops by nearly 19 percent. This includes a 20.6 percent drop in active open space, from 0.24 to just 0.19 acres per 1,000 residents—well below the CEQR guideline of 2.0. These small new open spaces are largely passive, privately owned, and exposed to air quality and shadow impacts. This isn't mitigation—it's greenwashing. The Draft EIS must disclose who will maintain these spaces, whether they're public year-round, and provide the full amount of public open space needed to meet CEQR thresholds. (LICC-HPCC_001)

Three of the six proposed required shore public walkways labeled as "parks"—on Sites 65, 67, and 71—are confirmed to have significant adverse air quality impacts due to nearby sources that will mean they are heavily polluted upon opening. The Draft EIS paradoxically counts these polluted spaces as mitigation while admitting they will be unhealthy from Day 1. CEQR prohibits counting unusable or impaired open space as valid mitigation. The City must either redesign these "parks" to eliminate air quality impacts, or provide equivalent alternative sites that meet CEQR air quality and usability thresholds. Otherwise, this is an environmental justice failure masquerading as a benefit. (LICC-HPCC_001)

Two existing publicly-owned parks—Gordon Triangle and the 44th Drive Pier—will suffer significant adverse air quality and shadow impacts, making them unhealthy or unusable. These are not theoretical issues; $PM_{2.5}$ pollution and lost sunlight make these parks dangerous, especially for children, seniors, and those with asthma. The DEIS tries to downplay this by referencing future "mitigation" but provides no enforceable or measurable solution. CEQR requires that usable open space be preserved—not sacrificed. This is a textbook direct impact, and its mitigation must be site-specific, enforceable, and include local public input and oversight. (LICC-HPCC_001)

Response 267: Both the amount of publicly accessible open space that would be added to the study area as a result of the Proposed Actions and the projected reduction in total, passive and active open space ratios are reported in the DEIS. As described in the DEIS, at least 4.38 acres (and potentially up to 6 acres) of publicly accessible

open space would be provided as a result of Proposed Actions. These open spaces would range in size from 0.08 acres to acres 1.48 but they would all be interconnected by the shore public walkway. These open spaces would be open to the public year-round on a constant and regular basis. These new public open spaces are not considered as mitigation in the DEIS but rather they would be implemented in the With Action condition as a result of the Proposed Actions. As described in Chapter 21, "Mitigation," in the DEIS, all significant adverse air quality impacts affecting the usability of public open spaces (including at the Sites 65, 67, and 71 open spaces) would be avoided with the implementation of the proposed traffic engineering improvements. Also, possible mitigation measures have been identified in Chapter 21, "Mitigation," to address the adverse shadows impacts that would occur at two study area open space resources. Absent the identification and implementation of feasible mitigation measures that would fully mitigate, significant adverse impacts would be unmitigated.

TRANSPORTATION

Comment 268: Court Square–23rd Street, Queensboro Plaza, and 21st Street–Queensbridge stations will be significantly impacted by 10,000+ new peak-hour riders. The DEIS acknowledges 8 stairs, 2 escalators, and fare gates will exceed safe capacity thresholds but offers no committed MTA or developer funding to address these failures. Without guaranteed upgrades, these dangerous chokepoints will worsen commuting conditions for thousands. CEQR mandates mitigation for transit impacts exceeding volume-to-capacity thresholds—yet the DEIS punts responsibility to future coordination. This is insufficient and noncompliant with CEQR. (LICC-HPCC_001)

Response 268: A comprehensive analysis of potential impacts on transit systems, including buses, subways, and related pedestrian elements, was undertaken for the EIS. These analyses were performed in accordance with the 2021 *CEQR Technical Manual* and are presented in Chapter 14 ("Transportation"). Existing data provided by Metropolitan Transit Authority-New York City Transit (MTA-NYCT) was used. The future conditions analysis, including the potential for significant adverse impacts and associated mitigation measures (discussed in Chapter 21, "Mitigation"), reflects the projected transit demands expected from the build-out of the Proposed Actions over the next 10 years. Five subway stairs and

one fare array at Court Sq-23rd Street (E/G/M/7) would be significantly adversely impacted in one or more peak hours under the Proposed Actions. Subway mitigation measures have been proposed for these impacted elements including stair widening at impacted stairs and installation of additional turnstiles at the impacted fare array. If implemented, the proposed mitigations are expected to mitigate the five impacted stairs and the one impacted fare array. These subway analyses and recommended mitigation in the EIS were reviewed and coordinated with MTA-NYCT. Proposed measures are subject to final review and approval by NYCT.

Comment 269: The Long Island City ferry landing will operate at a volume-to-capacity ratio of 1.69 in the morning and 1.22 in the evening—well beyond CEQR's 0.90 threshold. The DEIS admits this will cause queues to spill into Gantry Plaza State Park, displacing pedestrians and park users from vital open space. Yet no physical redesign or ferry service increase is proposed, such as the possibility of a new ferry landing at the renovated wharf in Queensbridge Park. The DEIS must include site-specific ferry infrastructure mitigation, not defer to future planning. Otherwise, the impact is both unmitigated and noncompliant with CEQR standards. (LICC-HPCC_001)

Response 269: The 0.9 volume-to-capacity (v/c) ratio threshold for CWFS impacts in the *CEQR Technical Manual* is used to determine significant impacts for ferry line haul analysis. The ferry landing analysis should not be evaluated against a 0.9 v/c ratio as the queues form and dissipate relatively quickly. Based on guidance from EDC, the ferry landing analysis is a supplemental analysis to the line haul analysis. Therefore, the ferry landing analysis has been updated in the FEIS to assess the ferry landing conditions on whether the queuing area is anticipated to extend onto the Gantry State Park esplanade as a supplemental analysis to the ferry line haul analysis. Chapter 21, "Mitigation," in the FEIS discusses the effects of the proposed ferry line haul mitigation measures on ferry landing conditions. Proposed measures are subject to final review and approval by EDC.

Comment 270: The DEIS shows 26 sidewalks, 16 crosswalks, and 10 corners exceeding CEQR's congestion thresholds during peak periods. Areas like Vernon Blvd and 44th Drive—already struggling with pedestrian crowding—will be dangerously overburdened. Despite this, the DEIS provides no design solutions to widen sidewalks or

improve intersections. With nearly 27,000 new person trips projected during the PM peak, the lack of committed pedestrian infrastructure upgrades is a glaring omission. The DEIS must provide detailed plans to mitigate pedestrian congestion in compliance with CEQR standards. (LICC-HPCC_001)

Response 270: As discussed in Chapter 14 ("Transportation"), 26 sidewalks, 16 crosswalks, and 10 corners would be significantly adversely impacted in one or more peak hours under the Proposed Actions. Potential mitigation measures have been presented in Chapter 21 ("Mitigation"). Sidewalk mitigation measures include removal of parked cars on sidewalks, paving dirt/grassed strips to create a more walkable area, and relocation of obstructions. Crosswalk mitigation measures include the widening of crosswalks and corner mitigation measures include curb extensions and relocation of obstructions. The proposed mitigation measures would fully mitigate nine sidewalks, four crosswalks, and eight corners among the impacted elements.

Comment 271: The DEIS admits to significant adverse impacts across schools, public parks, transit, air quality, and more—but offers no enforceable mitigation. Nearly every section defers action to the FEIS, pending further "coordination," "review," or "exploration." CEQR mandates that mitigation be identified and feasible at the Draft EIS stage, not simply promised later. This document proposes zoning text amendments to "encourage" future schools or parks but includes no funding, no phasing, and no guarantees. Without binding commitments, this chapter fails CEQR's basic standards for mitigation planning and must be revised to include enforceable strategies. (LICC-HPCC_001)

Response 271: The DEIS discloses the potential for significant adverse impacts and proposes a range of mitigation measures to be considered by DCP, as lead agency, and the implementing agency with oversight over the relevant mitigation measures. The FEIS identifies feasible and practicable mitigation measures, as selected by DCP and implementing agencies. If no such mitigation is identified, the impact remains unavoidable. The proposed waterfront open space developed through the WAP would be constructed by private developers of waterfront properties. Concerning mitigation for schools, between the publication of the DEIS and the FEIS, the SCA has determined that the community facility space included in Projected Development Site 1 would potentially be an appropriate location for a school and is actively discussing a potential school development with the property owner. In the event that a school is

constructed on this site, it would serve to partially mitigate the elementary school impact resulting from the Proposed Actions.

Comment 272: The DEIS proposes that 7, E, F, and G subway lines, as well as Court Square stairs, escalators, and fare arrays, can be fixed by adding trains or widening stairs. But these fixes are not funded and depend entirely on MTA agreement. The DEIS admits stair widening is infeasible at most impacted locations and no additional fare arrays or escalators can be added. CEQR does not allow agencies to assume another entity will implement mitigation. Without committed interagency agreements, these are not mitigations—they are deferrals. (LICC-HPCC_001)

Response 272: Mitigation for subway impacts is described in Chapter 21, "Mitigation," of the FEIS.

Comment 273: Recommend that the City Administration commit to developing a comprehensive transportation mobility plan for the Project Area and Context area that recognizes the challenges – conceded in the DEIS – of trying to reconcile the scale and variety of additional transportation demands that the OneLIC plan will impose within and beyond the rezoned blocks. The DEIS identifies dozens of locations that will be over capacity during various peak periods. It concludes that the Proposed Actions could create unmitigated adverse impacts at 25 intersections and about a dozen sidewalks and a dozen crosswalks during one or more of the time periods analyzed. The DEIS concludes that parking demand in the with-action condition will significantly exceed available off- and on-street parking, forcing unlucky residents and local workers to park ¼ to ½ mile away from their destination. The DEIS wrongly dismisses this as an insignificant impact, citing the availability of local transit options. However, the same analysis also identifies subway stairs and escalators that would be over capacity during certain peak periods and then explains why physical improvements to correct those impacts are infeasible. The DEIS itself makes clear that redevelopment on the scale of the OneLIC Plan requires a comprehensive and integrated plan to balance varied demands on streets, pedestrian routes, curbside management, and transit resources. (Venech_041)

Response 273: Comment noted. Mitigation for the significant adverse transportation impacts are discussed in Chapter 21, "Mitigation."

AIR QUALITY

Comment 274: The DEIS admits $PM_{2.5}$ concentrations at Vernon Boulevard and 46th Avenue will exceed NAAQS and CEQR's *de minimis* thresholds—posing a documented health risk. Traffic engineering changes may help, but even with mitigation, annual $PM_{2.5}$ still exceeds thresholds at all tested sites. The DEIS punts responsibility to a future "grid analysis" and revised modeling that may or may not show compliance. CEQR requires mitigation based on current best-available data. Relying on hoped-for future emissions declines is speculative and dangerous. Air quality impacts must be mitigated now or flagged as unacceptable. (LICC-HPCC_001)

Response 274: The proposed traffic mitigation measures presented in the DEIS demonstrate that there would no significant adverse air quality impacts from the Proposed Actions due to mobile sources with respect to CO and PM2.5 National Ambient Air Quality Standards, which are health-based thresholds. Therefore, with the proposed traffic mitigation measures, no significant adverse impacts on public health are predicted.

SHADOWS

Comment 275: The DEIS confirms that Greenstreets medians on Queens Plaza South will receive 6–7.5 hours of new shadow per day during the growing season, which the report admits will damage trees. That constitutes a significant adverse impact under CEQR's vegetation criteria. Yet the DEIS provides no mitigation beyond vague references to Chapter 22. These medians are part of NYC's pollinator network and stormwater management infrastructure. The DEIS must present a concrete planting plan showing what vegetation—if any—will survive and how these losses will be offset elsewhere in the neighborhood. (LICC-HPCC_001)

Response 275: The DEIS concluded that incremental shadow resulting from the Proposed Actions would cause significant adverse impacts to the Greenstreets medians on Queens Plaza South between Vernon Boulevard and 13th Street. Therefore, as described in Chapter 21, "Mitigation," the City is required to explore potential mitigation measures to reduce or eliminate the shadow impacts on these medians. Such measures could include replacing or monitoring vegetation for a set period of time or undertaking additional maintenance to reduce the likelihood of species loss. Other potential mitigation strategies include the redesign or reorientation

of the open space to provide for replacement vegetation or other features, and modifications to the height, shape, size, or orientation of a proposed development to reduce the significant adverse shadow impact. The DEIS also disclosed that the two-block Pollinator Place Garden, located farther east in Queens Plaza between 23rd and Crescent Streets, would receive limited incremental shadow, but that all areas of the garden would receive adequate direct sunlight throughout the growing season and would not be significantly impacted by development resulting from the Proposed Actions.

ALTERNATIVES

Comment 276: Despite identifying multiple historically eligible buildings on projected development sites, the DEIS fails to assess a single rezoning alternative that preserves them. Sites like the Walter Lippmann Building or the Perlstein-designed Tom Cat Bakery could accommodate development through adaptive reuse or altered massing. CEQR requires that the EIS consider alternatives that would avoid or reduce significant adverse impacts. This failure to present even a preservation-sensitive scenario violates both CEQR law and the spirit of the neighborhood plan's promise to protect LIC's architectural character. (LICC-HPCC_001)

Response 276: The DEIS considers No Unmitigated Significant Adverse Impacts Alternative and a No Action Alternative in Chapter 22, "Alternatives."

Comment 277: The DEIS concedes that numerous adverse impacts will remain unmitigated. Under CEQR, these widespread failures trigger a requirement to explore project alternatives. Instead, this plan moves forward as-is. The scale of unmitigated harm warrants serious reconsideration of the Proposed Action or a reduced-impact alternative. (LICC-HPCC_001)

Response 277: Chapter 22, "Alternatives," of the DEIS assesses a development scenario that would not result in any identified significant unmitigated adverse impacts.

Comment 278: The "No Unmitigated Significant Adverse Impacts" alternative claims that modifying the Proposed Actions to avoid unmitigated impacts would make the project infeasible. This is speculative and lacks supporting alternatives with phased development, offsite mitigation, or other zoning tools. Under CEQR, agencies are

required to analyze and present feasible alternatives that could mitigate impacts, not dismiss them based on assumed infeasibility. The DEIS avoids a rigorous evaluation of less impactful zoning or design options, undermining the purpose of the Alternatives chapter and failing to demonstrate good faith consideration of community-driven alternatives. (LICC-HPCC_001)

Response 278: As discussed in the DEIS, to eliminate all unmitigated significant adverse impacts, the Proposed Actions would have to be modified to a point where the principal goals and objectives would not be realized through the land use and zoning actions.

Comment 279: The DOE Site Development Alternative highlights increased affordable housing units, but fails to adequately address worsening early childhood program impacts—projecting a shortfall of 128 childcare slots versus 67 in the Proposed Action. This impact is downplayed and left to future consideration in the FEIS. This omission violates CEQR's requirement to fully evaluate foreseeable impacts and mitigation strategies. Moreover, the claim of "greater affordability" masks the fact that the plan shifts burdens onto public services without addressing service expansion, revealing a narrow focus on unit counts rather than comprehensive livability or equity. (LICC-HPCC_001)

Response 279: Similar to Proposed Actions, the DOE Site Development Alternative discloses a significant adverse impact to early childhood programs that is attributable to the increased number of affordable units under the alternative, which would result in a greater shortfall relative to the shortfall expected with the Proposed Actions, and proposes mitigation measures in Chapter 21, "Mitigation."

Comment 280: The DEIS concedes that the No Action Alternative would avoid all unmitigated significant adverse impacts—including those related to noise, traffic, shadows, air quality, schools, and historic resources. Yet it is summarily dismissed for not meeting the "goals and objectives" of the Proposed Actions. This narrative evades a transparent trade-off analysis between density, livability, and environmental harm. By failing to explore refined versions of the No Action Alternative that incrementally add density while mitigating impacts, the DEIS sidesteps meaningful discussion of how a more balanced or community-aligned approach could serve city policy goals with fewer trade-offs. (LICC-HPCC_001)

Response 280: See response to Comment 278.

Comment 281: Despite extensive community engagement in the Long Island City planning process, no alternative grounded in community-led priorities—such as anti-displacement safeguards, industrial preservation, or environmental justice zones—is analyzed in the DEIS. This is a significant procedural and ethical failure. CEQR explicitly supports the evaluation of reasonable alternatives that reflect public concern. The Alternatives chapter includes only agency- or developer-defined scenarios. The exclusion of community-informed pathways reinforces mistrust and undermines the credibility of the environmental review process. (LICC-HPCC_001)

Response 281: Comment noted. Alternative zoning proposals that cannot meet the goals and objectives of the Proposed Actions, including the provision of substantial housing, including needed affordable housing, community amenities, and open space, and which were formulated through a neighborhood planning process, would be at odds with the Neighborhood Plan put forth by DCP and the local community.

Comment 282: During scoping, many requested that the CEQR process evaluate not just the proposed action scenario laid out by DCP but also, as part of an alternative "with-action" scenario or scenarios, two well-known community-informed plans for sites on the Anable Basin waterfront: the Western Queens Community Land Trust's proposal for the DOE building at 44th Drive and Vernon Blvd (attached to my colleague Jenny Dubnau's submission) and the Hunters Point North Vision Plan for Resiliency. (Wolf-Powers_WQCLT_052)

Response 282: Pursuant to the guidance of the *CEQR Technical Manual*, alternatives are presented which serve to reduce or eliminate significant adverse impacts identified in the environmental analysis. See response to Comment 281.

Comment 283: This chapter appears to contain an error on pages 22-18 to 22-19. In discussing contextual impacts on historic resources, it refers to "unmitigatable shadows impacts" that would result from the with-action condition. However, in addition to our comments on the Shadows chapter, above, the shadows analysis only projects potential significant adverse shadows impacts due to shadows on open space resources, not on any sunlight-sensitive historic resources. The reference in the Alternatives chapter should be corrected so as not to suggest there are significant impacts at other locations. (Hare_Plaxall_055)

Response 283: The discussion concerning contextual impacts to historic resources in the "No Unmitigated Significant Adverse Impacts Alternative" has been clarified in the FEIS.

Comment 284: Pooling the publicly owned land at Anable Basin with the 15-20 percent required public access areas from private zoning lots would create a continuous waterfront park with shared coastal defenses, providing robust resiliency through natural and engineered solutions. The park would simultaneously anchor the new neighborhood, significantly improve waterfront access, help channel stormwater runoff, and bring critically needed public open space that would act as an economic engine-just as the parks at Hunters Point South have done. LIC is currently the third lowest in per capita open space in the city, and the OneLIC plan will make it THE lowest. There is no logical reason to situate housing inside the floodplain and putting low-income families at risk. Housing should be safely behind the floodplain and closer to transportation-in underutilized corridors along the eastern side of Vernon Blvd and the eastern end of 44th Drive (among others). (Goren_LICC-HPCC_134)

Response 284: As discussed in Chapter 1, "Project Description," the Proposed Actions seek to encourage the development of new housing and waterfront open space. The large, City-owned sites in the vicinity of Annable Basin are vacant and underutilized and would be redeveloped with waterfront open space, affordable housing and other community amenities. Appendix C of the DEIS, "Waterfront Revitalization Program Policy Assessment," considers the exposure of identified projected development sites to current and future flood risk for the 2050s, 2080s, and 2100s, identifies the development sites most vulnerable to sea level rise and coastal flooding and discusses the measures to address current and future coastal flooding.

Comment 285: Unlike OneLIC's fragmented approach, which leaves critical needs to a patchwork of private responses (none guaranteed), the Vision Plan front-loads cohesive planning and provides a roadmap for forward thinking, sustainable development that addresses existing problems and LIC's future needs. (Goren_LICC-HPCC_134)

Response 285: Comment noted.

UNAVOIDABLE ADVERSE IMPACTS

Comment 286: The DEIS acknowledges significant adverse impacts to elementary schools, libraries, early childhood programs, open space, air quality, and transportation—and then admits that many of these cannot be mitigated. This violates CEQR's core principle of avoiding or minimizing impacts. If a project causes irreversible harm to public infrastructure, health, and safety, it should not proceed without substantial redesign. The scope of "unavoidable" impacts confirms that the Long Island City Neighborhood Plan is not supportable in its current form and must be significantly reduced or restructured to protect the community. (LICC-HPCC_001)

Response 286: The DEIS is a disclosure document. As indicated in the comment, it identifies significant adverse impacts of the Proposed Actions. In accordance with CEQR, unavoidable adverse impacts are those that would occur if a proposed project or action is implemented regardless of the mitigation employed, or if mitigation is infeasible.

Comment 287: The DEIS admits significant transit impacts to eight subway stairs, three escalators, one fare array, and all G/E/F/7 trains, with no firm mitigation. Most improvements—like extra train service or widened stairs—depend on future MTA action with no commitment, funding, or feasibility analysis. Six subway stairs and all escalator/faregate impacts remain unmitigated. This means tens of thousands of new riders will enter an already failing transit system. CEQR does not permit agencies to defer critical mitigations to external actors. Without a binding MTA partnership plan, these impacts are unmanageable and should trigger a downscaling of the proposal. (LICC-HPCC_001)

Response 287: Mitigation measures for the significant adverse transit impacts are identified in Chapter 21, "Mitigation." As noted in Chapter 21, DCP as lead agency will consult with New York City Transit to determine the feasibility and practicability of the mitigation measures.

Comment 288: Construction across 54 sites will expose neighborhoods to noise as high as 100 dBA—a level known to harm cardiovascular health, interfere with learning, and cause stress. The DEIS concedes that mitigation measures like barriers and electric tools won't eliminate the risk. NYCHA residents, schools, parks, and seniors in the area will suffer through a multi-decade buildout without adequate

protection. CEQR requires clear thresholds and enforceable mitigation—neither are present. (LICC-HPCC_001)

Response 288: The DEIS disclosed a range of mitigation measures to be explored by DCP, as lead agency, between DEIS and FEIS. As discussed in Chapter 21 of the FEIS, DCP identified no feasible mitigation measures to address the significant adverse construction noise impact.

CEQR requires that mitigation measures be explored by the lead agency and agreed-upon with other agencies that may have oversight regarding implementation of mitigation. For some significant adverse impacts, including the construction noise impacts, feasible and practicable measures may not be identified that would mitigate the impact. The majority of the development sites identified in the DEIS would be developed by private property owners. The DEIS identifies potential measures to mitigate or reduce the impact.

Comment 289: Even after mitigation, the DEIS predicts annual $PM_{2.5}$ levels will exceed federal standards at Vernon Boulevard and other intersections. These are toxic pollution levels linked to asthma, stroke, and cancer. The DEIS suggests future "refined modeling" will show lower numbers—but provides no proof. CEQR mandates disclosure of current health threats and mitigation based on the best available science. Any project that knowingly exposes New Yorkers to illegal pollution levels cannot move forward under SEQRA without fundamental redesign or denial. (LICC-HPCC_001)

Response 289: Comment noted. Chapter 15, "Air Quality," the FEIS includes updated modeling of particulate matter ($PM_{2.5}$) concentrations using more comprehensive analysis procedures to determine the magnitude and extent of neighborhood-scale PM2.5 impacts from mobile sources. The results show that with traffic mitigation implemented, annual $PM_{2.5}$ would be significantly reduced, though not entirely eliminated.

GROWTH-INDUCING ASPECTS OF THE PROPOSED PROJECT

Comment 290: The DEIS absurdly claims this 54-block rezoning—adding nearly 15,000 housing units and over 3.4 million square feet of commercial space—will not "induce significant new growth in the surrounding area." This contradicts basic land use economics. Rezonings of this scale reshape investor expectations and

speculative activity, especially in adjacent unprotected areas like Dutch Kills, Ravenswood, and Queensbridge. CEQR requires analysis of secondary development pressures and displacement beyond the rezoning boundary. This chapter ignores that responsibility entirely and must be redone to include potential knock-on effects on adjacent housing markets, industrial zones, and community-serving uses. (LICC-HPCC_001)

Response 290: The development anticipated as a result of the Proposed Actions is identified in Chapter 1, "Project Description." The development is anticipated to occur on projected and/or potential development sites identified in the Project Area, which is the area that would be directly affected by the zoning and other land use actions. The potential effects of the Proposed Actions on secondary or indirect residential and commercial displacement is considered in Chapter 3, "Socioeconomic Conditions." The DEIS concludes that the Proposed Actions would not result in significant adverse impact related to indirect residential and commercial displacement.

Comment 291: The DEIS admits the project will remove 794,485 square feet of industrial space—a 25 percent cut across the project area—but claims this will not spur displacement or regional growth effects. Yet CEQR requires assessment of whether land use changes could shift industrial activity elsewhere or displace industrial businesses to less appropriate or more vulnerable neighborhoods. This oversight ignores the City's own manufacturing retention goals and environmental justice mandates. Growth-inducing impacts must account for where displaced industries go, what they displace, and how that affects other overburdened communities. (LICC-HPCC_001)

Response 291: The Proposed Actions would to increase the amount of light manufacturing and commercial space and allow a wider range of light manufacturing and commercial uses than that which is currently allowed in the Project Area. According to Chapter 3, "Socioeconomic Conditions," some manufacturing and light industrial uses would continue to be vulnerable to displacement due to rent increases. Retail and other service-oriented businesses that are not capturing additional revenues from changes in consumer spending would also continue to be vulnerable to displacement. Many of these businesses operate in largely light industrial or mixed-use areas offering goods and services such as security systems, fabrication and welding services, wholesale food or office supplies, and fireproofing materials. The displacement of vulnerable businesses would not

have the potential to result in significant adverse impacts because the potentially displaced businesses do not represent anchor institutions or function as a defining feature of the local economy, and the goods and services they provide would continue to be available to consumers within reasonable trade areas.

Comment 292: The DEIS admits the plan will "enhance the growth of local commercial corridors" and increase demand for goods, services, and community facilities—but claims this growth is already factored into the RWCDS and won't spill over. Yet earlier chapters forecast library and school overcrowding, transit congestion, and pedestrian safety issues—proof that projected growth does trigger broader service needs. CEQR requires a realistic assessment of regional secondary impacts. This plan has clear growth-inducing potential beyond its mapped boundaries and should be analyzed for service demand inflation, speculative commercial conversions, and displacement of community-serving uses. (LICC-HPCC_001)

Response 292: The DEIS was prepared in accordance with SEQRA and the guidance of the *CEQR Technical Manual*, which recommends an assessment of potential impacts on community facilities such as schools and libraries, and transit infrastructure and pedestrian conditions.

Comment 293: The DEIS claims the plan won't induce new growth because it doesn't add infrastructure—but it leverages existing infrastructure capacity across sewers, transit, ferries, and schools. CEQR defines growth inducement as both direct infrastructure expansion and enabling overuse of existing systems that leads to unplanned growth elsewhere. With 14,699 new units and no concurrent school or transit expansions, this plan stretches systems and signals to future developers that the area can absorb more. That's growth inducement by policy signal—not pipe installation. This chapter must reflect that reality and assess regional pressures now set in motion. (LICC-HPCC_001)

Response 293: According to SEQRA and the *CEQR Technical Manual*, growth-inducing aspects of a proposed project generally refer to "secondary" impacts of a proposed project that trigger further development. The development expected as a result of the Proposed Actions is identified in the Reasonable Worst Case Development Scenario in Chapter 1, "Project Description," and comprehensively analyzed through the DEIS.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Comment 294: The DEIS acknowledges irreversible commitments of municipal labor, infrastructure investment, and public funding (e.g., schools, sewers, transit planning)—but offers no assurance that community needs will be met in return. Public dollars and institutional capacity will be spent to support a speculative private development, without legally binding commitments for public schools, public parks, or deeply affordable housing. CEQR requires that the long-term trade-offs of public investment be disclosed. Here, the public bears the cost while the benefits are privatized. That is not a fair or transparent commitment of City resources. (LICC-HPCC_001)

Response 294: Comment noted.

Comment 295: Once rezoned and developed, the 54-block area will be permanently removed from future planning opportunities that might prioritize industrial jobs, energy resilience, climate adaptation, or open space. The DEIS admits this but offers no consideration of the public opportunity cost of locking in land use around speculative luxury development. CEQR requires that irreversible land use commitments be weighed against alternative futures. By failing to model a lower-density or climate-adaptive alternative, the City forfeits flexibility on land most critical to Western Queens' long-term sustainability and public purpose. (LICC-HPCC_001)

Response 295: The Proposed Actions would facilitate a more resilient waterfront and potentially increase the supply of needed housing and jobs for residents of Long Island City.

Comment 296: The DEIS admits that several buildings eligible for State and National Registers—including the Walter Lippmann Building and New York & Queens Electric Light Company—will be demolished. These demolitions are listed as "unavoidable" but are also irreversible losses of architectural and cultural heritage. CEQR requires that such losses be clearly justified and weighed against feasible preservation or adaptive reuse alternatives. Here, no preservation scenario was modeled. Once these cultural anchors are gone, they cannot be recovered—and with them goes a layer of LIC's working-class, industrial legacy. (LICC-HPCC_001)

Response 296: Comment noted. The referenced buildings would be replaced with new buildings that would allow existing light manufacturing businesses establishments to expand and grow, and allow new

business to locate to the neighborhood and provide needed jobs for residents of Long Island City.

EFFECTS ON DISADVANTAGED COMMUNITIES

Comment 297: Many of the school, child care, and library deficits will fall on residents of Queensbridge Houses and surrounding Disadvantaged Communities (DACs). These residents already face lower public service access and higher educational vulnerability. CEQR and CLCPA require an environmental justice analysis of whether overburdened communities will disproportionately suffer. This is absent. When new units consume all school capacity, existing families will bear the overflow. That is a textbook disproportionate burden and must be disclosed and mitigated— not hidden behind citywide service assumptions. The DEIS violates its own DAC review in failing to address this. (LICC-HPCC_001)

Response 297: Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. The analysis considers the Proposed Actions' potential effects on community facilities including elementary schools, libraries, and early childhood programs.

Comment 298: Even before this rezoning, LIC had less than 1 acre of open space per 1,000 residents—far below the CEQR goal of 2.5. The DEIS acknowledges this and then proposes a plan that makes it worse. After buildout, total open space drops to just 0.55 acres per 1,000 residents. This is not planning—it's an environmental justice failure. In CEQR's own terms, a drop of over 2 percent in underserved areas is "significant." This drop is nearly 19 percent. The DEIS must either dramatically expand usable public open space or face a formal finding of significant adverse impact. (LICC-HPCC_001)

Response 298: Chapter 5, "Open Space," addresses the Proposed Actions' potential impacts on open space. Chapter 26, "Effects on Disadvantaged Communities," assess potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. The analysis considers the Proposed Actions' potential effects on DACs, including open space impacts.

As discussed in Chapter 21, "Mitigation," mitigation measures will be taken to reduce the Proposed Actions' significant adverse impacts on open space, including the expansion of existing parks, creation of new open space on publicly owned land, and incentivizing owners of privately owned sites to create new open space as part of their redevelopment.

Comment 299: The Draft EIS overlooks the equity issues associated with to the application's transit and safety impacts. Many of the most congested intersections, transit chokepoints, and dangerous corridors—21st Street, Vernon Boulevard, and Court Square—serve lower-income communities and immigrant populations. Yet the DEIS includes no environmental justice analysis of how these impacts will disproportionately burden those who rely on walking and public transit—or other low-carbon solutions. CEQR requires assessing whether adverse transportation conditions disproportionately affect vulnerable populations. The DEIS must analyze transit crowding, pedestrian danger, and street-level air pollution impacts through a racial and socioeconomic equity lens. Lower carbon solutions and intermodal connections including use of the waterways must also be considered. (LICC-HPCC_001)

Response 299: Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. The analysis considers the Proposed Actions' potential effects on DACs. The FEIS chapter includes additional analysis with respect to the Proposed Action's potential to result in disproportionate impacts on DACs related to transit and pedestrians. DCP should weigh in. The early DAC chapter examples that we were provided to AKRF indicated that traffic itself is not pollution. Is this still DCP's position? It should be noted that Part 2 of DEC's Draft Full EAF asks whether the proposed action may increase traffic within a disadvantaged community, as well as result in "other impacts" on DACs. Therefore, please see revised DAC analysis, which addresses the potential for disproportionate impacts related to transit, pedestrians, noise, and air quality.

Comment 300: While the DEIS quantifies $PM_{2.5}$ exceedances, it omits the public health implications for communities already facing high asthma rates. Vernon Boulevard and Queens Plaza are both near NYCHA housing and designated Disadvantaged Communities (DACs). CEQR requires assessing not just emissions but health

outcomes—especially for pollutants like $PM_{2.5}$ with known cardiovascular and respiratory risks. There is no exposure modeling, no assessment of vulnerable populations, and no cumulative risk framing. This violates CEQR's environmental justice guidance and contradicts NYC's commitment to equity under the CLCPA. (LICC-HPCC_001)

Response 300: There is currently no environmental justice guidance under CEQR. Therefore, as noted in Chapter 26, "Effects on Disadvantaged Communities," the draft SEQRA Full Environmental Assessment Form (EAF) was consulted for guidance for this analysis.

Comment 301: The Project Area overlaps with neighborhoods identified by NYC DOHMH as having a high Heat Vulnerability Index and known nuisance flooding. Yet there's no climate justice assessment. CEQR requires consideration of disproportionate environmental burdens, and the DEIS admits that over 100 sites will be in flood zones by the 2050s. The DEIS must include an equity-based analysis showing which vulnerable populations are most at risk from extreme heat, flooding, or power outages. Without this, the chapter fails to address PlaNYC's and CEQR's mandates to assess impacts on disadvantaged communities. (LICC-HPCC_001)

Response 301: Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. Burdens and vulnerabilities at or above the 80th percentile compared with the rest of the census tracts in New York State have been added to the chapter for each DAC in the study area, based on the NYS Disadvantaged Communities Criteria Map.

Comment 302: The DEIS completely fails to assess how air and noise pollution will disproportionately affect vulnerable populations—including NYCHA residents, seniors, and children near Vernon Boulevard and 46th Avenue, where multiple exceedances occur. CEQR requires identification of receptors with elevated vulnerability, yet this chapter treats all exposures as equal. There is no demographic mapping, asthma rate comparison, or hospital admission data cited. This erases the lived experience of DACs and violates environmental justice principles now embedded in state law. Without a health vulnerability analysis, the DEIS is both incomplete and inequitable. (LICC-HPCC_001)

Response 302: Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate air or noise pollution burden in a DAC. This analysis has been further clarified in the FEIS. The chapter considers existing burdens and vulnerabilities. Burdens and vulnerabilities at or above the 80th percentile compared with the rest of the census tracts in New York State have been added to the chapter for each DAC in the study area, based on the NYS Disadvantaged Communities Criteria Map.

Comment 303: [The significant adverse open space impact] leaves Long Island City residents—especially in Queensbridge and Dutch Kills—with even less green space, in a neighborhood already far below city standards. The DEIS offers no timeline, funding, or public guarantee for new space. This is a textbook example of an unmitigated, environmental justice failure. (LICC-HPCC_001)

Response 303: Chapter 5, "Open Space," addresses the Proposed Actions' potential impacts on open space. Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. The analysis considers the Proposed Actions' potential effects on DACs, including open space impacts. As discussed in Chapter 21, "Mitigation," mitigation measures will be taken to reduce the Proposed Actions' significant adverse impacts on open space, including the expansion of existing parks, creation of new open space on publicly owned land, and incentivizing owners of privately owned sites to create new open space as part of their redevelopment.

Comment 304: Elementary school utilization would surge to 143.8 percent, with over 1,300 new students beyond current capacity. The DEIS offers speculative ideas—like repurposing space or "possibly" constructing a school—but admits there is no confirmed mitigation. Under CEQR, this level of overcrowding constitutes a significant adverse impact, especially in Disadvantaged Communities where children already face educational barriers. Without funding and a guaranteed new school site, the DEIS must either reduce the project's residential density or face a formal CEQR finding of infeasibility and denial. (LICC-HPCC_001)

Response 304: Community facilities impacts are addressed in Chapter 4, "Community Facilities." Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. The analysis considers the Proposed Actions' potential effects on community facilities including elementary schools.

Comment 305: [The unavoidable construction noise impacts are] an unacceptable public health trade-off and a violation of environmental justice obligations under the Climate Leadership Community Protection Act. (LICC-HPCC_001)

Response 305: Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. The analysis considers the Proposed Actions' potential noise effects on DACs.

Comment 306: New York State law (ECL §8-0109[2][k]) now mandates that EIS documents evaluate whether actions cause or increase disproportionate pollution burdens on Disadvantaged Communities (DACs). This chapter fails that test. It cherry-picks technical findings without presenting cumulative impacts, health outcomes, or intersecting vulnerabilities. It also fails to define "disproportionate" or explain why burdened DACs with compounding traffic, polluted stormwater, poor air quality, and construction noise risks are not entitled to additional protections. This violates both the letter and intent of the new statute and must be completely revised to meet legal standards. (LICC-HPCC_001)

Response 306: DEC does not provide a definition for "disproportionate." However, the DEC's definition of a "disproportionate pollution burden" has been updated in the FEIS, Chapter 26, "Effects on Disadvantaged Communities." Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. Burdens and vulnerabilities at or above the 80th percentile compared with the rest of the census tracts in New York State have been added to the chapter for each DAC in the study area, based on the NYS Disadvantaged Communities Criteria Map.

Comment 307: While the DEIS acknowledges that traffic, air pollution, and construction noise all affect DACs, it evaluates them separately—ignoring how they compound in neighborhoods already overburdened. For example, Census Tracts 33 and 43 will experience open space loss, shadows, library overcrowding, mobile-source air pollution, and construction noise—yet the DEIS never aggregates these risks. CEQR requires consideration of cumulative effects, especially under environmental justice frameworks. The omission of a combined risk or health burden assessment represents a critical failure that violates state equity mandates and denies DACs a complete environmental review. (LICC-HPCC_001)

Response 307: The Environmental Justice Siting Law requires that an EIS include an evaluation of whether the proposed action causes or increases any disproportionate pollution burden in a DAC. Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC. The analysis considers cumulative environmental burdens and vulnerabilities. For example, the analysis presents DACs that have comparatively higher or lower burdens and vulnerabilities based on DEC's DACAT. This tool compares a DAC's existing burdens and vulnerabilities to comparable non-DACs. As noted in the chapter, the assessment considers cumulative effects from multiple technical areas.

Comment 308: The DEIS repeatedly defers action by suggesting that "mitigation measures will be considered" in future stages—offering vague references to possible schools, libraries, or transit coordination. However, CEQR and ECL §8-0109(2)(k) demand that disproportionate burdens on DACs be avoided or minimized upfront. You cannot place toxic exposure, overcrowded facilities, and intensified air pollution on historically marginalized neighborhoods and then hope to fix it later. The "mitigation-by-promissory-note" approach violates the burden-reduction principle central to climate and environmental justice law. (LICC-HPCC_001)

Response 308: According to DEC, mitigation measures must be taken into account when evaluating the significance of an impact.[3]

Comment 309: The DEIS claims that mobile source air pollution and construction noise do not disproportionately burden DACs because affected census tracts have "lower burdens and vulnerabilities." This framing is misleading and dangerous. Any DAC is, by legal definition, overburdened—the existence of "higher" or "lower" burden tiers does not mean pollution in "lower burden" DACs is inconsequential. Using internal DAC gradations to justify additional environmental burdens defies the intent of the law and CEQR's core principles of equitable impact distribution. (LICC-HPCC_001)

Response 309: According to DEC, there is a decreased likelihood that a proposed action may have a moderate or large impact on a DAC that has been identified as having lesser existing burdens or vulnerabilities.[4] However, Chapter 26, "Effects on Disadvantaged Communities," of the FEIS discloses potential for disproportionate pollution burden related to DAC Census Tracts of both "higher" and "lower" burdens and vulnerabilities.

Comment 310: There is no mention of public outreach, language access, or community engagement specific to affected DACs—despite the legal requirement to center those most vulnerable. DACs impacted by this plan include multilingual, immigrant, and low-income populations with historic disinvestment. A compliant EIS must include outreach documentation, a health impact assessment, and summaries of how community input shaped the alternatives and mitigations. This DEIS contains none of that and must be revised to meet basic procedural justice obligations under CEQRA and CLCPA. (LICC-HPCC_001)

Response 310: Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate pollution burden in a DAC.

---

[3] DEC, *Appendix C Draft SEQR Guidance*, available at https://dec.ny.gov/sites/default/files/2025-01/part617risguidanceappc.pdf, last accessed July 29, 2025

[4] DEC, *Disadvantaged Community Assessment Tool Methodology*, available at: https://dec.ny.gov/sites/default/files/2025-01/part617risdactoolappa.pdf, last accessed July 29, 2025

Comment 311: The DEIS acknowledges $PM_{2.5}$ and CO levels that exceed *de minimis* thresholds and admits these may create public health impacts. Yet no health risk assessment is included. For DACs already facing asthma, cardiovascular illness, and limited access to care, this is a glaring oversight. CEQR and environmental justice law require disclosure of not just pollution levels, but how they interact with local health vulnerabilities. The lack of asthma rates, hospitalization data, or modeled exposure scenarios is a clear violation of both CEQR public health standards and New York State environmental justice law. (LICC-HPCC_001)

Response 311: Chapter 26, "Effects on Disadvantaged Communities," assesses potential effects on Disadvantaged Communities (DACs), including whether the Proposed Actions may cause or increase a disproportionate air pollution burden in a DAC. The chapter considers existing burdens and vulnerabilities. Burdens and vulnerabilities at or above the 80th percentile compared with the rest of the census tracts in New York State have been added to the chapter for each DAC in the study area, based on the NYS Disadvantaged Communities Criteria Map. DACs with comparatively higher or lower vulnerabilities were considered in the assessment of effects on DACs (see Chapter 26, "Effects on Disadvantaged Communities").

Comment 312: Nowhere in this chapter does the DEIS address how displacement of residents—especially in low-income, rent-stabilized housing—might affect health. Yet CEQR guidance explicitly allows for health considerations stemming from social and economic conditions. Evictions, forced relocation, and overcrowding increase rates of anxiety, depression, asthma, and chronic illness. Ignoring these impacts—particularly in Disadvantaged Communities (DACs) already facing health disparities—represents a severe analytical failure and violates the equity mandates of CEQR and the Climate Leadership and Community Protection Act (CLCPA). (LICC-HPCC_001)

Response 312: Chapter 2, "Socioeconomic Conditions," of the EIS includes an assessment of indirect residential displacement, following the methodology of the *CEQR Technical Manual*. The analysis concludes that market rate rents in the area are already unaffordable to low-income households. Given the high rental housing costs in the study area, it is expected that most low-income renters reside in protected rental units and would not be vulnerable to indirect residential displacement as a result of the Proposed Actions. The assessment of effects on DACs provided

in Chapter 26, "Disadvantaged Communities Assessment," of the EIS considers significant adverse impacts of the various technical areas that were identified using *CEQR Technical Manual* guidance. The DEIS did not identify significant adverse impacts related to indirect residential displacement or socioeconomic conditions more broadly. For this reason, displacement of residents was not considered in the assessment of effects on disadvantaged communities.

Comment 313: Please do not leave Blissville behind! It should be noted that with the release of NYC Planning's DEIS the Blissville section of Long Island City (census tract 199), a New York State defined Disadvantaged community was included as required by State law. Specifically, Blissville was included in Chapter 26 of the plan entitled, "Effects on Disadvantaged Communities." However, the inclusion we seek is not just for NYC Planning to inform us of the harm that may come to us… we seek Investments. (Mituzas_BCA_030)

NYC Planning's Draft Environmental Impact Study (DEIS), chapter 26, outlines the potential environmental impacts to the NY State defined disadvantaged communities like Blissville (Census Tract 199) within Long Island City and within the Context Area as defined by the 1LIC Neighborhood Plan. The investments we seek will help combat the effects identified in Chapter 26 of the DEIS and include:

Community Board 2 of Queens' Recommendations:

- a comprehensive street tree initiative to help combat pollution, reduce the effects of the urban heat island, remove rain from our sewage system, and enhance the overall well-being of all those who live, work and shelter in Blissville.
- a rain garden initiative targeted specifically for Blissville to help remove storm water from our over-saturated sewer system; and
- the creation of an inland park within the context area, namely the 29th Street Park. A park also identified in feedback received from the Newtown Creek Alliance and the President of Laguardia Community College. Each has called for the expanse of the footprint of parkland in the context area of the 1LIC Plan by the creation of the 29th Street Park at the head of the Dutch Kills Tributary directly behind Laguardia Community College and steps away from neighboring communities of Court Square, Blissville and South Sunnyside.

Donovan Richards Queens Borough President's Recommendations:

- Blissville Green Asphalt Plant resolution – the City and State must ensure that Green Asphalt's smokestack is doubled to reduce air pollution and odor in Blissville.
- Blissville Greenway. Funding for capital upgrades in terms of sidewalk, bike lane barriers, trees and greenery along Review Avenue from Borden Avenue to Laurel Hill Boulevard.
- Greenpoint Bridge Entrance. Capital project to redesign the intersection at Greenpoint Ave and Review Ave to make it safe for pedestrians and cyclists, while continuing to accommodate truck traffic. (Mituzas_BCA_030)

Response 313: Comment noted. DCP will continue to work with partner agencies to develop public realm strategies as part of the neighborhood planning process.

CONCEPTUAL ANALYSIS

Comment 314: The DEIS proposes zoning mechanisms (e.g., plaza bonuses, school bulk relief) that enable up to 256 new units and 800-foot towers without meaningful impact caps. The claim that "site-specific CEQR review will occur later" undermines CEQR and SEQRA's intent to assess all reasonably foreseeable impacts at the time of action. (LICC-HPCC_001)

Response 314: As discussed in Chapter 27, "Conceptual Analyses," there are no current projects utilizing the proposed zoning mechanisms. The chapter discloses the potential effects that could result from the future utilization of the zoning mechanisms, which would require their own environmental review as those approvals would be discretionary.

Comment 315: The DEIS acknowledges that revoking the Restrictive Declaration at Silvercup West could unlock 550,000 zoning square feet more than previously approved—but defers all analysis. This site includes waterfront parcels, a city landmark, and a power plant. Yet no shadow, hazardous materials, displacement, or infrastructure impact analysis is included. CEQR requires meaningful analysis of foreseeable impacts, not just placeholders for future EIS filings. The scale and location of this site demand a separate scenario analysis and inclusion in the RWCDS, not a vague conceptual footnote. (LICC-HPCC_001)

Response 315: The revocation of the Silvercup West Restrictive Declaration site is not part of the Proposed Actions, and there is currently no developer or property owner seeking to revoke the Restrictive

Declaration. A site-specific analysis and environmental review will be conducted at such time that a developer seeks to remove the Restrictive Declaration.

Comment 316: The DEIS quietly proposes that the Con Edison Learning Center site could be rezoned after 2035 for 4 million square feet of mixed-use development. This is larger than most entire rezonings. Yet it is excluded from the core RWCDS and lacks a build year, mitigation strategy, or infrastructure plan. This violates CEQR's requirement to disclose and evaluate reasonably foreseeable development tied to the Proposed Action. Deferring this to future piecemeal review bypasses the cumulative analysis that CEQR and SEQRA were designed to enforce. (LICC-HPCC_001)

Response 316: The DEIS does not propose any future rezoning of the Con Edison Learning Center. Since a future discretionary action would be necessary to develop the site as referenced, the future discretionary action would require environmental review to be conducted at such time that a developer seeks a rezoning or other action.

Comment 317: The proposed public plaza bonus allows 20 percent additional floor area and 60–85-foot height increases—yet the DEIS assumes only "minor effects." In LIC, small changes in height can dramatically expand shadows, exceed sewer thresholds, or worsen transit congestion. The assumption that site-specific reviews will catch these issues later conflicts with CEQR's requirement to analyze cumulative impacts of new zoning mechanisms created by the action. The City must provide a district-wide upper bound for this tool's usage or risk enabling mass upzonings without disclosure or mitigation. (LICC-HPCC_001)

Response 317: See response to Comment 314.

Comment 318: Under the new authorizations, multiple sites can exceed current RWCDS height assumptions— reaching 665 to 800 feet—because there is no mapped maximum height in M1-6A/R10. The DEIS admits this will add 256 units, yet refuses to model cumulative shadow, view, wind, or urban design impacts. In a city where skyline intrusions have caused measurable neighborhood character impacts, CEQR requires modeling height increases with visual simulations. The City must show skyline views, shadow maps, and bulk envelopes that correspond to real-world proposals—not just defer to future review. (LICC-HPCC_001)

Response 318: As discussed in Chapter 27, Conceptual Analyses," environmental assessment of the proposed authorization would be conducted in the future when an applicant acts on the proposed zoning mechanism. There is currently no project that proposes to utilize the proposed authorization.

Comment 319: The proposed school bulk flexibility authorization increases allowable building height by 30 feet, including at Conceptual Site 3, which sits on the Fanie Schuman Building (Resource G)—a potential architectural resource. The DEIS admits that demolition is likely but offers no preservation alternatives, adaptive reuse scenarios, or mitigation. It also claims that the bulk increase "would not change the use," yet fails to analyze contextual or skyline impacts. CEQR requires full analysis of architectural resources and neighborhood character impacts when demolition is foreseeable. This is a clear CEQR violation. (LICC-HPCC_001)

Response 319: The assessment in Chapter 27 is provided to disclose the potential effects of the proposed future authorization. The potential for significant adverse impacts, and any mitigation which may be required, would be proposed in connection with a site-specific environmental review in accordance with SEQRA and CEQR conducted in the future when the zoning mechanism is available and acted upon by a developer.

MISCELLANEOUS

Comment 320: Affirm support for union labor and fair employment practices. We encourage the use of union labor across rezoning-related projects to promote high-quality construction, worker protections, and equitable economic opportunities for residents. (CB2_Queens_002)

Response 320: Comment noted. This issue is outside the purview of CEQR analysis.

Comment 321: Address cumulative environmental impacts in Blissville, even though the neighborhood is not formally part of the OneLIC plan area. Blissville (Census Tract 199) is a historically marginalized community and must be included in the plan's infrastructure and environmental justice framework. Targeted investments such as a dedicated street tree and rain garden initiative in Blissville would mitigate legacy underinvestment and support the goals outlined in

the Mayor's Office of Climate and Environmental Justice. (CB2_Queens_002)

Response 321: Comment noted. This issue is outside the purview of CEQR analysis.

Comment 322: Expand the footprint of parkland in the broader context area by including park investments in Blissville. Specifically, we support the creation of the proposed 29th Street Park at the head of the Dutch Kills Tributary, directly behind LaGuardia Community College. This location serves Blissville, Court Square, and South Sunnyside, and addresses a documented open space gap in an area designated as a disadvantaged community under NY State criteria. (CB2_Queens_002)

Response 322: Comment noted. This issue is outside the purview of CEQR analysis.

Comment 323: City-owned buildings (e.g., former DOE building), whatever the final use, should be required to meet Passive House Standard, a) as a model to the city of energy efficiency, comfort, resiliency, and indoor air quality, b) to reduce energy use in order to move towards reducing the need for the Vernon Boulevard NYPA natural-gas fired peaker plant. (Fowler_005)

Response 323: Comment noted. This issue is outside the purview of CEQR analysis.

Comment 324: It will be only fair to apply to change to our side of the street. It shouldn’t be discrimination against smaller landlords. (Bor_016)

Response 324: Comment noted.

Comment 325: Review critically the likely adverse impacts of the OneLIC Plan on the future of Long Island City as a strategically located district for light manufacturing, media, and innovative “maker” businesses, and evaluate options to reduce those impacts. (Venech_041)

Response 325: Direct and indirect impacts to business displacement were analyzed in Chapter 3 of the DEIS, “Socioeconomic Conditions.”

Comment 326: As a resident of the Queensbridge Houses, I call on the OneLIC project to include vital improvements that will improve the quality of Queensbridge residents. For too long, Queensbridge has been

excluded from the deep investments that the rest of Long Island City has received.

The OneLIC project must include the following:

- Investment in the Queensbridge Houses. Queensbridge has extreme capital needs such as elevators that go out for months at a time, door locks that are broken so anyone can enter our buildings, and a laundry list of maintenance issues in individual apartments.
- A New Community Pool in Queensbridge Park: Bring back a larger and safer version of the pool that existed in Queensbridge Park in the 1970s. Pools are not just a place for recreation but also education and community building.
- A Dog Park in Baby Queensbridge Park: Our pets deserve better recreational facilities and this will lead to cleaner streets in Queensbridge.
- Repairs and expansion of the PAL Early Childhood Center: Repairs have been needed to this center for a long time, and our children deserve the same resources and amenities as any other child in the city. We need additional capacity as the number of children in the development and surrounding area has increased.
- Repairs for the Riis Community Center: Another vital community space in the heart of Queensbridge Houses that has been neglected for far too long.
- A New Grocery Store: Access to fresh, affordable food is essential for our health. We need a new grocery store with affordable nutritious and delicious food.
- New Parking Lot. A new parking lot would help with congestion and people would stop parking their cars in what is supposed to be a public Greenway.
- Connect Queensbridge Park with the rest of the parks along the LIC waterfront.

As members of the largest public housing complex in the country, we urge you to address our long-standing neglect and ensure that Queensbridge Houses priorities are included in the OneLIC project. The project's Environmental Impact Statement must examine the feasibility of these investments. (QueensbridgeScoping_148)

Commit to replace/reinstall the public pool at Queensbridge Park or provide another meaningful and substantive NEW amenity such as a library, recreation center, etc. done in collaboration with the community. (CB1_Queens_150)

Response 326: Comment noted. Where significant adverse impacts are identified throughout the EIS, mitigation measures are identified in Chapter 21, “Mitigation.”

GENERAL SUPPORT

Comment 327: After reviewing the details of the OneLIC proposal, we believe this plan embodies the thoughtful, inclusive approach to neighborhood development that our city needs. The plan's focus on creating permanently affordable housing at various income levels directly addresses New York's housing crisis. At the same time, investments in infrastructure, open space, and schools demonstrate a comprehensive vision for sustainable community growth. (Purkey_ABNY_003)

The proposed rezoning will not only provide much needed affordable housing to the area but will also bring more individuals, couples and families which will support local retail businesses. (Joly_008)

OneLIC is not only surely needed but we need more like it. (Wang_011)

I [am] very much in favor of the rezoning of the district. (Cheung_013)

I strongly support this plan! We need more housing and green space! Please move his forward. (Smith_014)

I believe it will be beneficial to have more school seats, green space, parks, and more affordable housing benefits to the neighborhood. (Sprite_015)

I am submitting this testimony in strong support of the OneLIC Neighborhood Plan. My family owns properties within the rezoning area. Located on the east side of Vernon Boulevard across from Anable Basin. (Holterbosch_017)

I think Long Island City is a wonderful place to live, and I think more people should be able to live there. The more housing that can be built there, the better. (Carter_018)

Need more affordable housing and school for the neighborhood. (Zhou_019)

I'm a renter living in market-rate housing in Court Square, and I'm writing in support of the Long Island City Neighborhood Plan. This plan moves the neighborhood and the city forward in a lot of important ways. (Guttman_022)

I am writing to encourage you to support the OneLIC rezoning in order to unlock additional housing (especially permanently affordable housing) and jobs in our community, as well as an expanded and more cohesive waterfront. I am particularly excited by the economic integration at scale that Mandatory Inclusionary Housing will create in the context of this substantial rezoning. (Zoorob_024)

The proposed plan also includes some affordable housing and specific housing for students unable to find apartments elsewhere. The proceeds of sale would also enable the Foundation to provide housing stipends for other graduate students. The majority of our students come from the NY region and stay in the NY region as productive workers or teachers/academics. The LIC plan is great for the community, for CUNY and for New York City. (Glucksman_CUNYGCF_025)

I am the owner of Block 458, Lot 145 and Lot 76. I am in favor of the new revised zoning from M1-4 to M1-5. (Bor_026)

As I have previously testified, the OneLIC Neighborhood Plan looks not only to benefit the entire LIC community by its scope and scale, it would also permit our foundation to sell the property for the development of badly needed LIC housing, while eliminating a 10-year-old community eyesore and unlocking the value of the property for the benefit of CUNY faculty and students. The fact that the CUNY public university system, of which we are a key part, is notoriously underfunded is well known, so this potential sale, dependent as it is on adoption of the Plan, would have a major positive financial impact on CUNY. (Darrow_CUNYGCF_027)

This rezoning plan thoughtfully addresses critical needs in our neighborhood—from infrastructure improvements to housing and education. I urge you to remain steadfast in your support and move forward with its approval and implementation. (Papamichael_TVG_028)

We want to express our full support of the current proposed OneLIC Neighborhood Plan in its entirety. (Heffner_ECIW_029)

This rezoning is incredibly important for our area and community. It will open up more opportunities and is directly connected to numerous existing businesses and potential new businesses that wish to establish themselves here. (Steg_031)

I'm in support of this project. The city is in a housing crisis, and I am heartened to hear about this project. I want to afford to live in

this city, and we need more homes to do that. This project is a step in the right direction. (Maza_032)

In advance of the City Planning Commission Public Hearing today, I am submitting this testimony in strong support of the OneLIC Neighborhood Plan. My family owns properties within the rezoning area, located on the east side of Vernon Boulevard across from Anable Basin. (Holterbosch_035)

I am writing to say I support OneLIC. We need more housing in LIC and I am very excited about this prospect. I also want more restaurants, shops, schools, [and] green spaces. I live in LIC and am excited [by] these prospects. (Stein_037)

The time is long overdue to change the area and bring robust infrastructure, housing, jobs, and investment into the area. I am in full support of the re-zoning and encourage the Commission to vote YES to a better Long Island City. (Wu_038)

We desperately need more housing. If anything we should be building more than what's currently allocated. (Anesh_039)

I endorse the new housing proposed by this plan. (Lewyn_TLC_042)

The LIC plan will result in a great benefit to CUNY and the students but also to the greater NY economy. (Glucksman_CUNYGCF_043)

I am strongly in favor of this project. I am speaking on behalf of thousands of Union laborers who not only deserve the work through building affordable space, but building new schools and required infrastructure upgrades. (Bermingham_DC16_044)

OneLIC, with its commitment to a range of affordability levels and family-sized units, offers a genuine opportunity to create a more inclusive and sustainable future for Long Island City, and by extension, for nearby neighborhoods like Astoria. (Baldwin_046)

New York City must constantly grow and renew to thrive. Long Island City is an underutilized transportation hub; it is the ideal candidate to rezone so to meet the City's desperate lack [of] housing. (Jessop_NAH_047)

We continue to support this effort which will bring much needed improvements to LIC. (Suna_SS_048)

I strongly support the OneLIC rezoning effort to help Western Queens grow and include more housing and affordable housing at that. (Mohanta_053)

I'm writing to you in support of the OneLIC Neighborhood Plan. (SunaBritchkow_HCP_056)

I support the plan's commitment to expanding resilient, connected public open space along the East River – a key priority for the Hunters Point Park Conservancy. (Das_057)

I'm here representing the Regional Plan Association. Thank you for having me and giving me the opportunity to testify in support of the OneLIC Neighborhood Plan.

Has long supported and advocated for increased housing in central transit rich areas, such as Long Island City. This neighborhood is a vibrant part of New York City, and many areas are currently hindered by outdated zoning regulations that restrict the construction of new multifamily buildings.

Further, large sections of the waterfront remain closed or inaccessible to the public, and at the same time both the neighborhood and the city are in urgent need of new income restricted, affordable housing as well as resilient, multipurpose open space infrastructure.

The OneLIC Neighborhood Plan has been a collaborative and comprehensive effort that will help address these challenges. It will enhance the neighborhood with investments and develop a continuous resilient waterfront connecting Gantry Plaza to Queensbridge Park. (Kim_RPA_067)

I'm here today in support of the OneLIC Neighborhood Plan. The energy and participation throughout this process from community workshops to the various public hearings, and beyond. Reflect just how much we all care about the future of Long Island City. (Cohen_069)

We strongly support the OneLIC Neighborhood Plan. The plan is a comprehensive community, informed and much needed initiative that addresses LIC’s pressing need for affordable housing, public spaces and resilient infrastructure. (Casa_NYBC_070)

OneLIC helps [to] address a lot of concerns, especially with the MIH options that CB2 asked for. (Ashraf_CB2_075)

I'm in favor of the OneLIC plan, and I'm very excited to see more school seats connected, waterfront access for our kids and families, [and] affordable housing for all generations to enjoy. (Xu_077)

I strongly support the OneLIC rezoning. A lot of the new housing construction would also help with climate resiliency, with creating more green space, and you know the construction will fund all of these quality of life improvements. (Franchino_078)

I'm testifying on my own behalf in support of the OneLIC plan. (Narburgh_079)

OneLIC create[s] a more well-rounded vision for the neighborhood… It actually guarantees affordable housing that wasn't guaranteed previously… You can get the deeply affordable housing that is needed in the district. (Celestin_080)

I'm here to testify in support of OneLIC plan. We desperately need new housing… This rezoning would allow is for us to increase the density, increase the affordability in Long Island City… The OneLIC plan is a vote to keep the people, keep the community, and keep affordability in our neighborhood. (Gallagher_081)

I'm thinking about quality schools, green spaces, infrastructure improvements, and a strong local economy. The OneLIC project brings all that closer to reality. It's not just about buildings, it's about jobs, housing and smart development that keeps families like mine in the neighborhood… I fully support OneLIC. (Dantonio_083)

When I walk just a few blocks west from Court Square, I noticed the area quickly becomes a lot less inviting and dynamic. It feels like there's a lot of missing potential there. I'm excited for OneLIC to change that, so we can have more of what makes Long Island city great, and I'm especially excited to have more neighbors of all income levels. Since this plan has a lot more subsidized affordable housing than we've ever seen in LIC before. (Reddy_084)

With the LIC neighborhood plan, there is the potential to provide even more for our community and for our city… OneLIC provides a real opportunity to positively shape the future of our neighborhood. I'm so pleased that CB1 and CB2 recommended with conditions in favor of the LIC Neighborhood plan. (Kirby_Plaxall_086)

I really look forward to its approval and its implementation… it would eliminate these critical shortfalls that exist in the community without a plan… Then the families and the artists and the visitors can thrive in the in the district. (Cheung_088)

I respectfully encourage the City planning commission to vote in favor of the Lic Neighborhood Plan, which can do so much good for both Long Island City and the many other neighborhoods of

Western Queens… This plan will make it possible for more people to raise families in Long Island City… The Lic Neighborhood plan will deliver vital flood protection measures at Anable Basin… Please vote for this plan to protect Lic from the threat of climate change. And lastly, this plan is a big opportunity for the city to invest in LIC's artists. (Hare_Plaxall_089)

I want to express my very strong support for the proposed rezoning… This rezoning plan thoughtfully and thoroughly addresses critical needs in our neighborhood From infrastructure, improvements to housing and education. (Papamichael_TVG_091)

It's time to choose abundance over fear. It's time to unlock the land, to build more housing, to have more tax dollars to let families like mine live here without having to save for 11 years, to be finally able to move to this city. Yes, to growth, yes, to progress. Yes, to a stronger New York. (Khosravi_092)

The borough of Queens needs more housing. This plan brings a substantial amount of both market rate and affordable housing to the market, and I'm extremely excited about the additional waterfront, open space and new schools, as well as more commercial space, to allow for our existing small businesses to grow, and for new ones to come into the neighborhood. (Xu_093)

I am writing speaking in support of OneLIC… I think that we need more housing of all types, and especially the market rate housing is going to really help. (Miller_094)

I'm calling in support of OneLIC throughout my entire life, New York City has been a perpetual housing crisis. The rent continues to be unaffordable for most people, because we simply just don't build enough housing in this city… So I unequivocally support OneLIC. (Nilsen_097)

We support the OneLIC plan as a vital step towards a more equitable and sustainable and connected future for Long Island city. The plan reflects many, many months of community engagement and addresses urgent needs from housing and schools to resilient infrastructure and waterfront access. We specifically support the over 1,300 new school seats that will be created, new accessible open space, affordable family-sized housing units and homeownership opportunities, resilient waterfront access, a transformed DOE building and improvements to sewer and drainage infrastructure (Yu_LICP_099)

New York City is facing a well-documented housing crisis that should and must be addressed by changes to zoning, to spur new

housing in high opportunity Neighborhoods like Long Island City… Plans like OneLIC are urgently needed to meet the current and future needs, not just of this neighborhood, but for the city overall… [and] will help facilitate housing development while creating publicly accessible open spaces for residents and improving the public realm. The plan also supports Long Island City's evolution as a dynamic mixed use. Neighborhood and regional employment center by expanding opportunities for modern commercial and industrial development and attracting new investment that can spur job growth. Importantly, the plan includes public realm and infrastructure improvements… The OneLIC plan is a thoughtful proposal that addresses our city's urgent housing needs while also investing in the long-term vitality of a critical growth neighborhood. (Decerbo_REBNY_101)

I strongly support the OneLIC neighborhood plan because it's the comprehensive solution the community needs right now… It directly addresses so many of the community needs spoken about already. I support this plan because it addresses so many interconnected needs in the neighborhood from affordable housing and schools to open spaces and infrastructure. OneLIC will create permanently affordable homes and multiple income levels with a focus on family size units, giving people of all backgrounds a chance to live in the community… The interconnected waterfront from Queensbridge Park to Gantry State Park will finally provide public access to areas that have been blocked for too long. (Sharaf_BPG_102)

I support OneLIC because our city needs more housing… We need to build more housing, not just affordable housing that would be directly affordable to these folks, but also market rate housing, which the OneLIC plan would include, to make sure that people who otherwise could afford… OneLIC would build enough housing that would have a noticeable impact on rents in the surrounding area. Slowing rent increases and preventing further displacement of people… I'm excited as a resident of the neighborhood to experience a fully connected waterfront park. (Decaudin_103)

The time is long overdue to change the area and bring robust infrastructure housing jobs and investment into Long Island City. So I am in full support of the rezoning and highly encourage the Commission to vote. Yes, to a better Long Island City. (Wu_106)

Response 327: Comment noted.

GENERAL OPPOSITION

Comment 328: I spoke with one of my customers yesterday and he brought up OneLIC project. He explained to me the rezoning does not help this community. (Pecollari_119)

Response 328: Comment noted.