# APPENDIX J

# WRITTEN COMMENTS RECEIVED ON THE DRAFT SCOPE OF WORK

**MEMORANDUM**
PLAN-604 Planning Law
TO: Professor Samara Swanston
FROM: Graham Cavanagh
RE: Hallets Point Development Project

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***Executive Summary:***

Hallets Point – a 7.5 acre peninsula located on the East River in Astoria, Queens just north of the Socrates sculpture park– has been proposed for a Large Scale General Delopment (LSGD) to be conducted by Lincoln Equities Group. The project has gained support from legislature whom in June 2012 passed a bill making the rezoning easier through transferring ownership from the State Parks Department to the New York City Housing Authority. NYCHA currently oversees the Astoria Houses complex located nearby the site. The proposed development includes mixed residential and commercial uses within 8-buildings, mostly between 20 and 30 stories tall on the north end of the peninsula on the site. The development will include a total of 2,300 units (80% market rate / 20% affordable housing which are aimed to be geared toward senior citizens). The development also intends to revitalize the waterfront as a publicly accessible open space with bicycle lanes to allow for active and passive recreation as well as a viewing area of Roosevelt, Randalls, and Manhattan Islands.

***Issues of concern:***

There are several issues of concern worthy of further discussion regarding the proposed redevelopment of Hallets Point:

1) How will this project improve transportation options for prospective residents; such as a bus/ bike/ or water taxi for commuters to and from the location?
2) What types of businesses will this project bring in? (It seems many residents would be supportive of the prospect of a grocery store, and other basic amenities).
3) What considerations have there been – other than the 20% affordable housing included in the development – for cultural preservation of the area and safeguarding against gentrification and potential real estate spikes in the area?
4) What precautions will be taken regarding disaster mitigation and response (particularly relevant for any waterfront property as we have recently witnessed with the event of Hurricane Sandy in areas such as Rockaway, Staten Island, etc).
5) In what ways has the project considered reducing its environmental impacts?

***Recommendations for Scope of Work:***

The Hallets Point Rezoning Environmental Impact Statement Draft Scope of Work states that: "development of the proposed project my potentially result in significant adverse environmental impacts." This is a particularly sensitive statement when dealing with a waterfront site where land and water must be safeguarded as both natural habitats and resources. The document touches upon a plan for "stormwater and sanitary sewer infrastructure to support the new development." This is another topic of importance that could be integrated at several levels of efficiency and integration to the proposed complex as well as surrounding area. Combined Sewer Overflow (CSO) is a notorious detriment to water quality and can be mitigated through several infrastructure designs, from low-cost short-term implementation of green space for rainwater sequestering to higher-cost long-term green-roofs, greywater systems, bioswales, and other types of water filtration and reuse to prevent overstress on the sewers. These may thereby mitigate environmental impacts on vulnerable habitats and vital resources. It is stated that there are currently two stowmwater outfalls located adjacent to the site, and the project proposes to include several more new outfalls directly into the East River. In accordance with NYSDEC and USACE, the development states that "stormwater generated on-site would be treated for water quality prior to discharge." However, there is no further explanation as to how this might function or through what type of infrastructure. It would be interesting to learn more about this aspect of the proposal and if environmental engineering systems such as those mentioned above have yet been considered for this purpose or what alternatives would be introduced.

In terms of natural disaster mitigation relating to a waterfront property, it would be advisable for the developer to consider permeable surfaces wherever possible to assist with water retention in the case of flooding. The design for the waterfront promenade with bike lanes, decking material, and green space as well as any surrounding sidewalks or parking facilities could be ideal opportunities for such innovations. Terracing of the surrounding landscape and runoff pathway could assist with the channeling of water in such a case as well. Further considerations may be waterproofing all street-level facades and relocating any HVAC sources, electrical generators, or other vital mechanical uses either above ground level or in highly waterproof areas to mitigate potential loss of power, heat, hot water in the case of an emergency flooding. These preparations may serve to protect the immediate complex and serve as a barrier for other more inland areas.

It is advisable that the proposed road network improvements include bicycle paths as designed by the NYC DOT in which bicycle lanes are protected from moving vehicular traffic by parking and distinctly painted barriers. After all, we recently discovered with Hurricane Sandy that bicycles are the most resilient form of transportation – when

subways flood and cars have no access to gasoline. Moreover, there has been some debate over the location of a ferryboat stop for commuting to Roosevelt or Manhattan Islands. Boats running on alternative fuel sources could be less detrimental to the water quality and the site selection for a pier or docking area should be chosen with respect to location proximity for easy access but also considering resulting noise and congestion – perhaps not directly adjacent to the site but offset in a more industrial zoned area. Buses could also be run on bio-fuels for that matter to further reduce carbon impact on clean air quality and bus stops could include solar collectors for street lighting and other uses.

Building materials used in the construction of this Large Scale General Development should be robust and able to maintain structural integrity in the case of an earthquake, flood, fire or other potential natural disaster scenarios. Ideally, these materials should be sourced as locally as possible to reduce the externality of transporting materials to the site and with as minimal environmental detriment as possible in the sourcing of the materials (e.g. wood should be sourced from Forest Stewardship Council approved vendor). In the use of concrete, fly ash may be used for a means of solidifying toxic particulate as well as strengthening the structural integrity of the material. Geothermal, solar, wind, and other renewable energy may be integrated into the complex to reduce demand on fossil fuels and provide energy for the residents. Passive heating and cooling may also be considered through solar orientation to maximize sunlight and retain thermal mass during cooler months, as well as provide conditions to promote air circulation during warmer months.

Pertaining to the provision of retail, grocery, or other amenities within the mixed-use development scheme, it is highly recommended to plan for quality of streetscape and proximity of these locations to promote walkability and activated public spaces within the area (See Jan Gehl: 'Cities for People' for a more in depth reference to urban design elements that lend to promote social interaction and community vitality). Some basic elements may include: trees and other plantings, good quality of lighting, welcoming facades, places to sit, bicycle lanes, etc. Economic studies have shown that this type of design consideration for the human scale and experience can lend to promote public health, environmental quality, as well as economic development for a local community. A final general recommendation would be to integrate this new development as cohesively as possible with the existing community both in terms of orientation of physical space as well as culture and needs. It would be advisable to hold several community board meetings to ask local residents for their recommendations for the future development of the area. This may provide not only unique ideas for the project but also create a sense of participation and perhaps even ownership as apposed to a sentiment of alienation by the new project.

December 4, 2012

Katy Skye Donald
487 Clinton Ave.
Brooklyn, NY 11238

Department of City Planning
City of New York

RE: Halletts Cove EIS

I am an graduate student studying Environmental Management and Planning at Pratt Institute located in Brooklyn, NY. I am currently involved in studying the processes of environmental planning and development and I am concerned about this plan. Given the events that have occurred in the last six weeks in New York City it is absolutely irresponsible to plan to build within the floodplain. When planning for the future it is imperative that we plan beyond the 100-year flood because the standards at which we currently measure the frequency of flood and severity are outdated.

To change the zoning for the project for members of a community that are young, for the playground, and elderly within the affordable housing section is irresponsible. Zoning is meant to protect individuals and ensure that the cities plans are suitable for the environment we live in and ensure hazardous businesses or environmental events are kept at a distance from the residential segments. That being said, I find no fault with a zoning text amendments to make part of Queens Community District 1 from being included within Food Retail Extension to Support Health (FRESH).

Changing zoning along the coast will only cause unnecessary risk of harm to individuals who are unaware of the risky environment they may plan to live in the future. There is nothing to stop these buildings from being destroyed by a flood and only causing a greater issue for the city if they then have to deal with the safety of the individuals who have chosen to live there.

Development in this area is not completely uncalled for. Commercial or retail businesses would benefit from the waterfront environment of the area as long as they are built to new standards ensuring that the buildings can withstand major flooding.

Flooding in New York City will continue to become more and more common based on even the most optimistic sea level projections twenty, fifty and one hundred years out. The idea that building such substantial infrastructure simply does not make sense, there is nothing to stop these buildings from being destroyed and endangering human life if an event occurs.

Changing the zoning for any of this project is irresponsible and will only endanger human lives. There are other areas in the city were development of this type can occur safely for those that might live there in the future. For example there are many brownfield sites that could be completely cleaned and made suitable for this kind of mixed development without endangering individuals to floods that will occur.

Thank you,

Katy Donald

***Public Comment on the Hallet's Point Rezoning: Environmental Impact Statement Draft Scope of Work***

***December 14, 2012***

***Submitted by Lenny Reisner, M.S. City and Regional Planning, Pratt Institute 2013***

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ENVIRONMENTAL REVIEW

Thank you for providing the opportunity to submit comments on the scope of Hallet's Point Rezoning Draft Environmental Impact Statement (DEIS). As a graduate student at the Pratt Institute, studying City and Regional Planning, I find areas of concern within the produced scope where the developers have overlooked key environmental impacts, mainly related to water.

In the wake of Hurricane Sandy, developers, residents and city agencies need to recognize the severity and seriousness that rising sea level poses to waterfront properties. Regardless of Mayor Bloomberg's stance of not retreating from the waterfront, his words add authority to and implicitly require mitigative and preventative measures along waterfront properties. To currently develop along the waterfront, in other words, requires an expanded scope of how the Hallet's Point development will interact and impact the waterfront; how the redesigned waterfront will interact with the land; and, insight into measures and programs that are responsive to potential sea level rise.

At a full build-out in 2002, Hallet's Point development intends to construct 2,573 housing units in addition, through 8 new buildings, to what already exists in the area, some of which have retail capabilities. Further, "approximately 1,439 garage parking spaces and 97 on-site surface parking spaces" would be added to the area. Specifically cited in the project description for Buildings 1 through 5 are below-grade and a more significant amount of above-grade parking spots. On the site where Buildings 1 through 5 are located, a waterfront esplanade would also be constructed, providing a benefit for the residents of Hallet's Point and a connection to adjacent parks. Another piece of infrastructure worth mentioning are the proposed construction of new stormwater outfall(s). Developers cite that this project is being promoted to support residential development and contribute to affordable housing.

Will anyone really want to live in an area prone to flooding in a future predicted to have increased flooding events? Our Mayor believes so, and therefore the scope of the Hallet's Point DEIS must cover water related mitigation measures, increased water retention, alternative energy, and emergency plans in worst-case-scenarios specifically during the construction phase. The project at hand has the potential for significant environmental impacts that I will now highlight, and detail their absence from the Hallet's Point Draft Scope.

*Task 3: Land Use, Zoning, and Public Policy*

The City of New York is working through amendments to the Waterfront Revitalization Plan 2020 that will significantly address expanding areas where coastal management is needed, as well as developing more policies to make waterfront areas more sustainable to resilient in the face of rising sea levels and climate change. The Hallet's Point developers *must* include language in the project description that explicitly

states compliance with new waterfront development policies. Not only is it in the developer's best interest, but it is in the interest of the City, the federal government, FEMA, and most importantly, for the health, welfare, and safety of the residents who would reside in the housing units in Hallet's Point. That the City is putting up for review an expansion of coastal zone rules and regulations is a strong signal that more and more areas are being impacted by rising sea levels and storm surge, and they are not prepared. They are not prepared.

The project description therefore must comply with new Waterfront Plan Amendments, and perhaps this would delay the full build-out year, but at a cost-savings to the developers and everyone else. Further, existing studies using GIS, surveys and land use trends need to incorporate the impacts from flooding as a result of Hurricane Sandy. Preparing a scope with this base of knowledge will help build a better response and preparedness to future floods and storms.

The Hallet's Point DEIS includes information about the no-build scenario, as well as the with-build scenario. What is missing is an analysis of the no-build with climate change, and the with-build scenario with climate change. And this missing, and important piece of information and analysis, occurs through the present DEIS scope. For economic, environmental, safety and social reasons, this critical forecast must be part of this scope. The Mayor of New York and a global community of scientists do not doubt climate change, especially when it could cost New York City so much money. The cost of ignoring climate change impacts will be far greater than what it will cost to create sustainable and resilient neighborhoods. Including climate change scenarios and subsequent impacts on the Hallet's Point project would greatly enhance the scope and allow for a more complete final EIS.

*Task 10: Natural Resources*

The scope Hallet's Pointr will "assess potential effects on natural resources and water quality in the future without the proposed project, accounting for any changes in the study area that may alter natural resources or water quality and public initiatives intended to improve the natural habitat and water quality of the New York metropolitan area." This requirement only strengthens the need for the Hallet's Point DEIS to include language that will comply with plans for the future amendments to the Waterfront Revitalization Program.

It is already known that much of the waterfront property along the New York City shoreline, including Hallet's Point, is vulnerable to sea level rise; Hurricane Sandy made this quiet clear, and future climate change projections, even the smallest, suggest sea level rise that will rise 2-5 inches by 2020. This is according to the New York City Panel on Climate Change (NPCC), convened in 2008. With "rapid ice melt", sea level rise is only expected to increase faster and impact coastal cities sooner. The NPCC strongly recommended preparing for climate change.

By these accounts alone, the Hallet's Pointr DEIS scope needs to take a hard look at what impacts the development would have on shorefront protection in the event of climate change, as well as how the development would interact with rising sea levels, and storm surges.

The area is also home to two industrial sites along 1st Street regulated under the Resource Conservation and Recovery Act (RCRA), through which hazardous materials

are utilized and transported. Should the waterfront development and park allow for storm surges or rising water levels to more easily access and damage these businesses, the public health impacts could be catastrophic over the long-term. This again, stresses the importance of having a waterfront development that is in compliance with the Waterfront Redevelopment Plan amendments, and takes a hard look at climate change implications.

Three sites in the area are also labeled for having open oil spills. These are located along the Astoria Boulevard in the middle of the NYCHA properties, on the corner 2nd Street and 27th Avenue, and on 27th Avenue and 8th Street. Again, the Hallet's Point DEIS scope needs to take a hard look at how their project will allow or mitigate climate change impacts.

Merely citing a floodplain analysis because Hallet's Point is within the current 1 in 100 year flood plain, and a Special Flood Hazard Area is not taking a hard look. Climate Change demands special attention, a hard look at the present and into future implications of a development along the waterfront vulnerable to rising sea levels. Alternatives to locating the project are important, but significant mitigative and adaptive measures are what are really required for the DEIS to take a hard look at the Hallet's Point development.

*Task 12: Water and Sewer Infrastructure*

The Hallet's Point project proposes alleviating some of the impact on wastewater treatment by creating onsite stormwater treatment. Developers cite the potential for creating several sewer outfalls in the Hallet's Point area. In light of climate change, though necessary review, the hard look, needs to take place as to how such infrastructure would play a role in flooding; what measures can be taken such that this new infrastructure can be sustainable and adaptive into the future?; and, what measures are possible that would significantly treat stormwater and runoff such that when it leaves to the river, it is potable. The current scope of the project for this section is not sufficient to take a hard look required by CEQR.

*Task 15: Transportation (Transit)*

The Hallet's Point DEIS intends to expand bus access to the area in order to accommodate the increase in residents. While the DEIS covers the required scope through transit analyses during the No Build and future Build scenarios, the missing hard look comes from not reviewing either build scenarios with climate change in mind. How will future transportation changes to the area be impacted by or induce flooding capabilities? Will the future project take into account flood mitigation measures? What about emergency plans? Are these two questions beyond the scope of the CEQR process such that they are not necessary to take a hard look at the impacts of development?

*Task 17: Greenhouse Gas Emissions*

The CEQR process only requires that developments take a hard look at the greenhouse gas emissions (GHG) as a result of the project. If a certain threshold is breached based on GHG emission estimates, or the project is of a particular development, a significant adverse impact could occur. While the Hallet's Point DEIS

does not cross that threshold, a valid effort is still made to investigate the impacts that climate change would have on the area, specifically because it sits within a 1 in 100 year flood plain.

In order for this section to really take a hard look at the consequences of climate change, the developers need to incorporate this information into each chapter of the DEIS. Climate change impacts do not occur within a vacuum, although in this case the geographic scope is set, the relative impacts can be felt through every category of this DEIS. The importance of making such connections and elevating the importance of this chapter cannot be understated.

*Task 20: Construction*

To cite the current DEIS, "construction activities, though temporary, can have a disruptive and noticeable effect on the adjacent community." With the previous comments in the task above, Greenhouse Gas Emissions, the same considerations apply here as well. Construction activities need not only take into account the noise, traffic and environmental impacts on the surrounding area, but the scope of analysis needs to be enhanced to account for how climate change and storm surges will impact construction. Furthermore, what construction activities would be severely impacted by climate change, and what precautionary measures can be taken to avoid adverse impacts on the project? Developers will be investing significant amounts of capital in hopes of creating their vision for Hallet's Point. Moreover, market rate housing in the area will honestly not be inexpensive. Taking measures to protect against climate change and storm surge during construction and after are critical for taking a hard look at the project.

Overall this project lacks the hard look in scope needed to address climate change. Whereas this chapter in CEQR is still young, the impacts from Hurricane Sandy and the extreme potential for sea level rise according to the NPCC, warrant elevating this chapter. Taking a hard look at climate change and sea level rise, flooding and adaptive measures are, in the city's and developer's perspective, quite possibly the most important aspect of this project. The economics of the future Hallet's Point development hangs on what measures the developer can take to adapt and mitigate future impacts. Taking the hard look required by CEQR will help secure the safety and sustainability of the project site and thousands of people for which the project is intended.

From: Maryam Khabbazian
To: Samara Swanston
Subject: Hallets Point Rezoning, Environmental Impact
Date: Dec 10, 2012

The Hallets Point mixed-use developments is a rezoning project proposed by Hallets A Development Company, LLC, in conjunction with the New York City Housing Authority (NYCHA) on several parcels along the East River in Astoria, Queens. By the request of the New York City Department of City Planning, a Draft Environmental Impact Statement of the proposed project needed to be prepared for the discretionary approval.

As a Graduate Planning student, I think that the environmental side effects of the proposed rezoning project are more significant than the positive effects of it on surrounding neighborhoods, and it is necessary to consider the long term effects of the project rather than immediate ones on the waterfront.

As it is mentioned in the summary of the plan, the project would be comprised of all improvement to be capable of getting zoning variance approval. Stromwater and sanitary sewer infrastructure would be proposed to support the new development from overflow. Also, other improvements (pedestrian access, traffic directional changes, reconnection to main streets and new bus services) would be made to the street networks and transit services in order to decrease the traffic congestion brought by new development as well as boost the circulation in the area.

In the current situation, the waterfront is underutilized. The proposed project is envisioned to develop new housings to accommodate more people in this area. Lack of amenities is the main issue for the residents of surrounding area and the mix-use development would provide enough facilities and commercial activities to serve the exiting residential population in addition to project-generated population.

Needless to say, all the improvements which would be made by the proposed project have very positive effects on improving the social and economic characteristics of the area. Based on the Scott Campbell's concept, sustainability in cities is achieved by making balance between three "E"s, Economic, Equity and Environment. The Halletts rezoning project covers the first two "E"s, however there is nothing proposed regarding the environmental characteristics of the area. The project is proposed to be built on several lots located along the East River. Looking at the NYC storm surge map, it is clarified that environmentally this area is not suitable for mixed-use developments and in the long term, people would be impacted by the environmental side effects of the project. The majority of the proposed project is located in the flood zone "A"

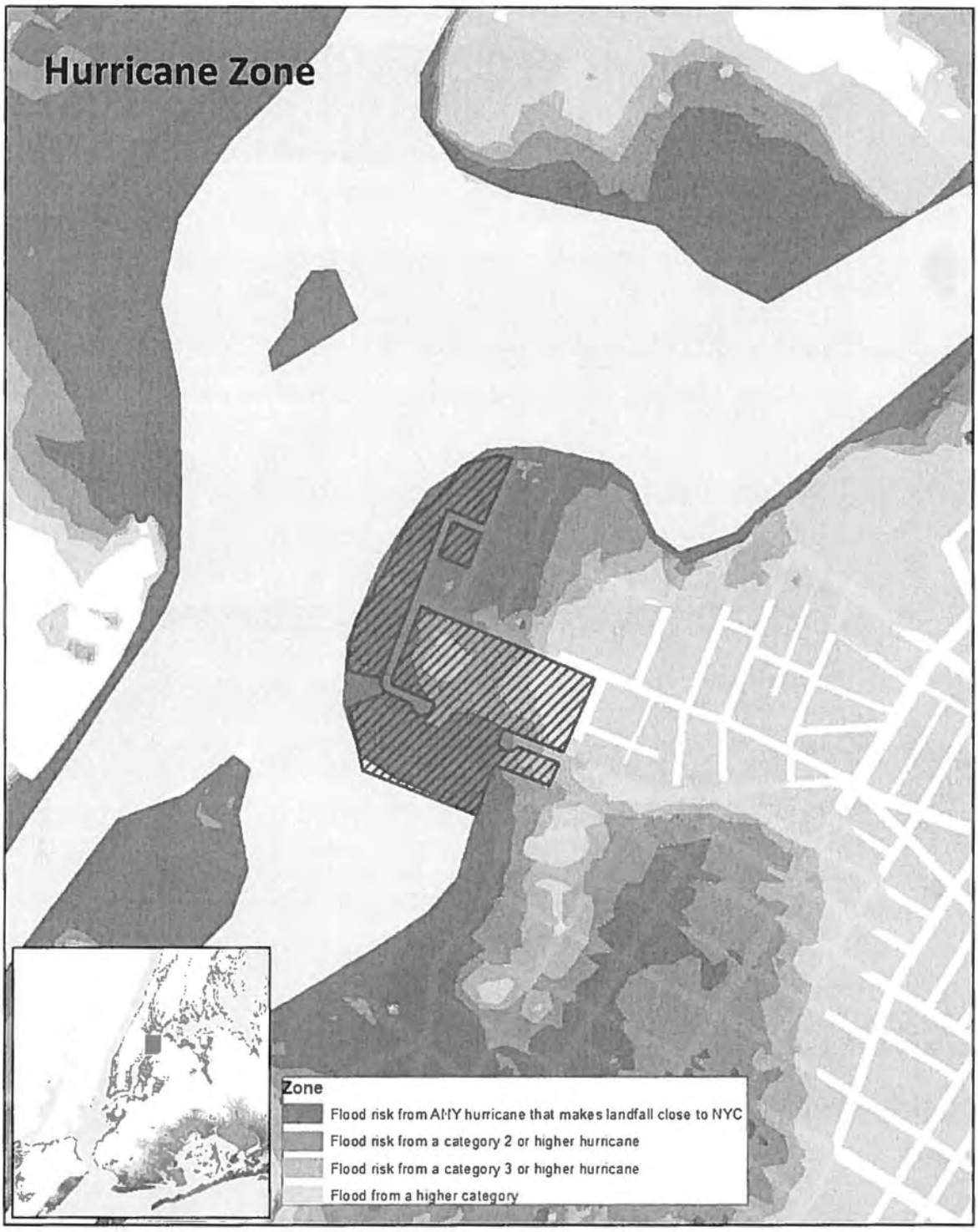
which means that the possibility of the area being damaged by any hurricane is most likely and flood insurance is mandatory.

By more interference in the natural cycle and converting the permeable waterfront to solid ones, it is predictable the area would have more runoff in the near future and consequently, the East River level would be raised. Therefore, if a hurricane comes, most areas in Hallets Point would be flooded. By having all these information about the environmental effects of the proposed project and hurricane Sandy's experience in NYC, it is not logical to approve mixed-use development which would be beneficial for people in the short term and a threat for their lives in long term.

The proposed development would accommodate thousands of people from various age groups. Among them would be seniors and children who are vulnerable and will be primary victims in emergency cases. Also, there are proposals for affordable housings offered to people who cannot meet the expense of insurance or damages caused by hurricanes. Therefore, we should seriously think "what is the reason of putting people in this dangerous situation?"

There are solutions to protect people from hurricane threats such as constructing sea wall or building on elevated structures, but all these solutions are both costly and still have damaging effects on people's lives.

Finally, the proposed development could be beneficial in any other areas and it is not specific for Hallets Point. Since Hallets point is located along the waterfront, there is a need for a plan which is proposed specifically for the waterfront and considered the environmental aspect of the area as well as social and economic aspects of it equally.


Hurricane Zone
Zone
Flood risk from ANY hurricane that makes landfall close to NYC
Flood risk from a category 2 or higher hurricane
Flood risk from a category 3 or higher hurricane
Flood from a higher category

Natalie Vichnevsky
Resident, Greenpoint, Brooklyn
9 December 2012

Public Comment
Re: Draft Environmental Impact Statement
Applicant: Hallets A Development Company, LLC
Public Scoping Meeting, 13 December 2012

My name is Natalie Vichnevsky. I am a Greenpoint, Brooklyn resident, small business owner and graduate student. I have an undergraduate degree in Urban and Environmental Planning from The University of Virginia and am currently working towards a Masters degree in City and Regional Planning at Pratt Institute in Brooklyn. With a focus on environmental planning and participatory planning approaches, the proposed development at Hallets Point is of particular relevance and interest to me.

The seven-acre waterfront development proposed for Hallets Point, in Astoria, is expected to bring 2,200 housing units to the waterfront. The plan encompasses seven residential towers and a mix of retail spaces, including a much-needed supermarket. The surrounding community, particularly the abutting New York City Housing Authority (NYCHA) development may indeed be in need of conveniently located amenities.

But, New York, haven't we learned our lesson?

Currently, the hard working men and women of the U.S. Army Corps of Engineers and the New York City Department of Sanitation are struggling to remove over 300,000 tons of storm-debris from our city, care of hurricane Sandy and our lack of foresight. Among that debris are 70 dumpsters of wasted food, damaged by Sandy's floodwaters, from Fairway supermarket situated on the waterfront in Red Hook, Brooklyn.

Sound familiar?

While it can be argued that Red Hook is more vulnerable to flooding, situated as it is, at the mouth of both the Hudson and East Rivers, according to data collected by the Federal Emergency Management Agency (FEMA), much of the waterfront of the Hallets Point peninsula saw very similar levels of flooding. In fact, according to the same FEMA data, the proposed site for 'Building 1' of the project in question, received up to 6 feet of water; the proposed site for 'Buildings 2-5' saw up to 18 feet of water; and even parts of the inland parcels, currently located within the existing campus of NYCHA Astoria Houses, which are sited for "Buildings 6-8,' saw between 3 and 18 feet of storm water inundation.

Such storm surges are no longer an eventuality; on the contrary, they are a stark reality- and a true danger to human life and our built environment. At the very least, if proper climate change adaptation is not built into all of our coastal development projects, these storm surges will continue to be a severe strain on our tax dollars and all municipal and Federal funding. While New York City may have been lulled into a false sense of security by the relative light hand that Hurricane Irene dealt to the metropolitan area, in 2011, in the aftermath of Hurricane Sandy, we can no longer turn a blind eye to the vulnerability of our city's waterfront.

While the siting of certain land uses on waterfront parcels has long been a subject of debate, in this day and age, and with the recent weather-related devastation we've seen, there should no longer be a question. Siting residential and industrial uses in the floodplain without proper -often impossible- mitigation measures, is short sited and irresponsible. Not erring on the side of caution threatens our infrastructure, the health of our waterways and endangers the public welfare.

Hurricane Sandy brought the evacuation of thousands of residents from their homes and stranded many residents in or away from their homes after the storm. The majority of Hallets Point sits in the City's evacuation zone 'B,' an area in which 'residents can expect a moderate likelihood of evacuation if a hurricane is expected to reach New York City.' While residents may not have been evacuated, many saw power outages as basements in NYCHA's Astoria Houses flooded and cars on the waterfront streets were submerged during the storm and left inoperable. It is undeniable that Hallets Point is vulnerable to weather related storm surges and flooding. This flooding, however is not just disruptive and costly, but also poses a health risk as the floodwaters bring with them not only bacterial pollution from the Combined Sewage Overflow's (CSO's) of our municipal sewage system and waste water treatment plants but also chemical pollution from the current and former industrial sites that lined the waterfront when industry, a then water-dependent land use, was still thriving in New York City. While much of our waterfront industry is now defunct, spurring rezoning requests such as the one in question here, the potentially toxic past of these sites must be fully explored before residential uses can be found appropriate.

It should be pointed out that housing is not a water dependent use. While the utility of living on the water, with it's panoramic views and pleasant breezes can't be denied, there is no necessity, as there was for industry in the past when such proximity facilitated shipping. We can better use our waterfront zones for recreation, as natural barriers and meditators of storm water and areas for the regeneration of native plants that clean the air and filter our water.

Why, then, would we not re-site vulnerable residential uses to inland areas where they would be safer and more resilient to the effects of severe storms: storms that will no doubt be arriving on our shores with greater frequency and strength in the years to come? While it is true that large tracts of land are increasingly difficult to come by in any of the City's boroughs, if residential towers are to be built here, along the waterfront, extensive mitigation measures need to be implemented. The costs associated with developing and executing necessary mitigation strategies need to be seriously considered and weighed against the benefits and realities of waterfront residential siting.

While it should be acknowledged, that this project has been on the table since 2006 and that the developers have made some effort to respond to community feed back, it bears pointing out that two other large developments are also potentially slated for the Hallets Point Peninsula. The Astoria Cove Project would bring an additional 1,800 units in four residential towers, adding to the seven in the Hallets Point plan, as well assorted low-rise buildings and another supermarket to an eight-and-a-half acre parcel on 26$^{th}$ Avenue and the waterfront. Across the street, another development site is on the market, on which up to 800,000 square feet could be built. While Hallets Point

may claim 'seniority' with respect to these would-be neighbors, it is vital that the combined and cumulative effects of these potential developments be considered. In order to accurately measure and plan for the ensuing environmental impact, projects of such magnitude cannot be looked at in isolation.

I applaud the effort of the developers to include affordable housing, particularly geared towards seniors, in the project. However, I once again question the wisdom of encouraging some of the City's most vulnerable populations- low-income and elderly residents, to reside on some of the City's most vulnerable geography. However, if the developer is truly interested in proving affordable housing, no doubt in exchange for additional Floor Area Ratio (FAR) in the towers, a fraction *above* the minimum required 20% would be more appropriate. In addition, the housing should remain affordable for the lifetime of the units, not on a limited-time basis. Furthermore, the 'promise' of affordable housing should be written into the text of a binding agreement, not just as part of a 'Memorandum of Understanding,' which does not actually obligate the developer or a new owner, were the project to be sold during development.

Also to be considered, in reference to the retail component of the project, is the type and size of retail options to be found in the new development. All along the East River waterfront in Brooklyn and Queens, large developments with tall towers and luxury apartments are dominating the waterfront. The monotony of these developments and their catering to high-end consumers cannot be overlooked. If the developer of Hallets Point is truly concerned with providing amenities for the new residents as well as the existing residents of the area due diligence will be required in assessing existing need among the current population, much of which resides in public housing adjacent to the new development.

As a small business owner, myself operating just a block and a half from the East River south of Hallets Point in Williamsburg, Brooklyn, I can attest to the lack of affordable retail spaces in equivalent new developments along the waterfront here. The sheer size and density of the endeavor, coupled with the already strained financial dynamic of having to cross subsidize with luxury residences to achieve proposed levels of affordable housing and open space, leaves little room to guarantee affordable, neighborhood-friendly retail space. Taking inventory of similar retail spaces at street level of residential glass towers in Long Island City, Queens and Williamsburg, we see that these retail spaces are largely vacant or occupied by well capitalized, chain stores.

With the Hallets Point development following suit and potentially setting an even more out of scale precedent, this will soon be the new face of western Astoria, monotonously dotted with Duane Reades, CVS's and vacant store fronts. For a development to truly 'revitalize' a community, as this project claims it will do, community-scale entrepreneurial opportunities need to be present. The developer must make certain commitments to foster neighborhood retail, by, for example, limiting square footage of retail area in a designated amount of available commercial space and encouraging the implementation of lease protection and rent stabilization for uses by local entrepreneurs and/or those in the 'creative economy.'

In drafting the Environmental Impact Statement for the Hallets Point development, the project is requesting the approval of an extensive list of zoning map changes, text amendments, modifications, waivers and variances. I urge you to disapprove these special permits on environmental grounds, but also until ample affordable housing is guaranteed and neighborhood-appropriate retail is prioritized.

32BJ SEIU
Stronger Together

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December 13, 2012

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22 Reade Street, 4E
New York, NY 10007

Re: Comments on Hallets Point Rezoning Draft Scope of Work

My name is Delroy Dawkins and I am here to testify on behalf of the Service Employees International Union Local 32BJ ("32BJ"), to comment on the proposed Halletts Point rezoning. 32BJ represents approximately 120,000 property service workers across eight states, including 71,000 in New York City. Nearly 2,300 of our members live right here in Astoria.

We support the goals of this current project, to develop housing--including several hundred affordable units—that is safe, secure, and brings amenities and open space to the neighborhood.

But we also urge the City to consider the positive socioeconomic benefit this project could have if we can ensure that the development is done responsibly. As a member of 32BJ, I have been able to count on steady wages and benefits like affordable healthcare and access to training classes. If Lincoln Equities commits to the creation of good jobs like my own, and addresses the needs of this community, this project can do a lot to keep Astoria a thriving neighborhood. But in order to do this, we need to make sure that the developers in this area agree to do business responsibly and be good landlords. Just next door, Alma Realty is looking to build another big development. But Alma and Steve Valiotis have made a habit of undercutting industry standards for their building service workers, and Alma's record as a landlord includes many tenant and HPD complaints.

Astoria can do better than this, and we hope that Lincoln Equities can too. The developer should take the lead and show that responsible development can address the issues of housing and good jobs that are crucial in these difficult times.

Sincerely,

Delroy Dawkins,
Member, SEIU 32BJ