

Rockaway Residents For Responsible Development



**Don't Destroy The Rockaways
With Irresponsible development**

Glenn DiResto

Dear Commissioner,

As a lifelong resident of the Rockaway Peninsula my family goes back in the Arverne community more than 100 years and Rockaway community is extremely important not only to me but to all the residents who have called the Rockaways home for years. The Rockaways is finally becoming a place where people once again want to visit and live and its future has never looked brighter. The development of the former Peninsula Hospital Site (Edgemere Commons) can play a vital role in the continued revitalization of the community, especially the Edgemere, Arverne and Far Rockaway section of the Rockaways which has been economically and racially segregated for years. This economic and racial segregation occurred for many reasons however the biggest is the failed policies of NYC with regards to housing and zoning along with a lack of municipal and private investment. The tide has finally turned, and we now have an opportunity to do something very special that will allow for a community to go from poverty to prosperity while allowing for economic and racial integration without displacement of current residents. However, there are significant changes needed to make this a reality and to ensure a more perfect plan that will mitigate the many SIGNIFIGANT Adverse Impacts listed in the DEIS so current and future residents will have less of a negative impact on their quality of life. In fact, Councilman Donovan Richards in his own words stated he does NOT support the project as it stands, only the concept, and feels certain aspects need to be moderated before he can approve.

Currently the Arker Companies has an “**as of right**” to build ONLY **568 units** of housing. However, they are applying for “**With Action**” discretionary rezoning and are looking to add an additional 1,632 units to the Project Site compared to the “No-Action condition”. The negative impacts to the community within the DEIS are many and would further cause hardships and quality of life issues for current and future residents if the current plan were to be approved as is.

This proposed LARGE-SCALE DEVELOPMENT with 11 buildings, almost all over 12 stories with many as high as 19 stories, containing a TOTAL of **2,200 units of Housing** on a small 9.34-acre plot of land, with ONLY 13% for Moderate- and Middle-income Households would result in much more intensive land use than currently exists and would introduce a substantial new residential population to the study area resulting in increased demand for community facilities and services and only put further strain on the community’s limited infrastructure of schools, public transportation, roadways, healthcare facilities, social services Ect.

Additionally, with only 13% of the units for the forgotten moderate and middle income families the long-term vitality of the community is in question as the city's own studies and reports have shown the area has high concentration of poverty, public housing, subsidized housing, nursing homes and there is a need for market rate units, affordable homeownership and a true mixed income community that this proposal does not address. We understand there is a need for affordable housing around the city but this plan is simply irresponsible as presented and hope you can address this issues in the DEIS with regards development size and balance of incomes as recommended by both Queens Community Board #14 and Queens Borough President.

On June 25th after reviewing the information of the rezoning proposal in the EIS and the presentation from the Arker Companies, Community Board #14 voted to disapprove the rezoning plan by a vote of 28-5 with recommendations with regards to density, better balance of income, schools, parking, ect.

- Did Community Board #14 vote to disapprove the rezoning because they don't want to see anything built at the site? NO!
- Did Community Board #14 vote to disapprove the rezoning because they don't respect the voice of the black and brown residents, as some at the City Planning Commission meeting stated? NO!
- Do people in the community use the word overdevelopment as code word for to many black and brown people in the community? NO

This is NOT a NIMBY! Members of the Community Board #14 including black and brown members from zip code 11691 and 11692 voted overwhelmingly to disapprove the rezoning, check with CB#14 yourself. They did this for no other reason than they are committed residents to the community and they want to see what in the long term best interest for this area of the Peninsula and its residents who have been forgotten about for decades and they want a more perfect plan presented that would minimizes the negative impacts in the DEIS, reduce density, increase parking and provides MORE benefits for the community.

This current plan as presented would go against everything that Community Board #14 voted on two months ago and would also go against everything they voted on during a citywide zoning text amendment not long-ago. Community Board #14 stated that they do NOT support any NEW Affordable Housing be built that is not at least 60% of AMI or greater and the focus be on homeownership and preferably Market rate housing. The Community Board also requested that there be NO reduction in parking requirement on anything that is built. With this current proposal the builder is going against EVERYTHING the community voted against TWO TIMES.

As members of the City Planning Commission you should be very aware the study area for the Peninsula Hospital rezoning OVERLAPS with the **Arverne Urban Renewal Area**, and the **Edgemere Urban Renewal Area**. However, during the environmental review process of the former Peninsula Hospital site (Edgemere Commons) the previous environmental studies mentioned above for Arverne, Edgemere and also the new Far Rockaway Urban Renewal Area were deliberately ignored and there was an Illegal segmentation of the study areas. The study of the development of the Peninsula Hospital site should have studied the cumulative environmental effects in a holistic study that this proposed project would have on the community and revised and or amended the other original plans mentioned, as the subject area overlaps, is adjacent too or in very close proximity to the other Urban Renewal Areas that already had prior studies done when the site was a hospital.

We all should embrace change when it is POSITIVE, and the redevelopment of this site will be an improvement to the community no matter what. The purpose of this is NOT to stop the development of the former Peninsula Hospital site; as we all know responsible development is desperately needed and wanted by the residents of the Rockaways. This is OUR community and we have to live with the results. We need City Planning Commission and Arker Companies to listen to the concerns as a community and go back to the drawing board and come back with a better plan that will benefit the people of the Rockaway community for generations to come.

This important issue is about the future of OUR Rockaway Community.

We Deserve Better!!

Thank You
Glenn DiResto

(SEE BELOW)



Peninsula Hospital

- Peninsula Hospital Closed in 2012
- Sold 2016 to the **Arker Companies**
- Price paid \$19 million
- Owner Peninsula Rockaway Limited Partnership/Peninsula Rockaway Housing Development Fund CORP.
- Plot Size 9.34 Acre site (406,850 Sq Ft)

Density and Surrounding Area

The Arker Companies wants to build “With Action” and add an additional 1,632 units of housing ABOVE their current **“as of right” to build 568 units**. This would make this area the most densely populated portion of the Rockaway Peninsula.

- 11 Buildings
- Many as high as 19 Stories High (Out of character surrounding area/Ocean Bay Apts.)
- 2,200 NEW Units of Housing (Twice the amount of Arverne View Apts)
- 6,500 + NEW Residents (Similar in population Arverne View and Ocean Bay COMBINED)
- 1,500 + School Age Children (No New School and PS/IS 105 is at 112% capacity)
- 734 Residential Parking Spaces (Only 35%)
- ONLY 9.34 Acres of Land

This proposal is slated to **bring at least 6,500+ NEW Residents** to the peninsula **FAR MORE than other developments in area.** It is near other populated developments which are Less Populated and on a **MUCH LARGER land footprint.** Let's put this proposed large-scale development into perspective to get a better understanding of what is being planned.

- **NYCHA Ocean Bay Apartments: 1,395 units** and about **4,000+ residents** on **30+ acres**
- **Arverne View Apartments: 1,093 units** and about **3,500+ residents** on **14 acres.**
- **Nordac Coop Building: 342 units** and about **1,000+ residents** on **7.5 acres**
- **Beach 41st St Houses: 712 units** and about **2,000+ residents** on **13+ acres**

This **“With Action”** Proposed development would have more units and bring in more NEW Residents than Arverne View, Nordac and B41st Houses **COMBINED!!**

This proposed development will dwarf the adjacent 7 and 8 story Ocean Bay Apartments and be far larger than anything that has ever been built in the Rockaways before. We are NOT Astoria, Williamsburg, Downtown Bklyn, or Long Island City. We are an isolated beach community that lacks good schools, adequate healthcare, adequate transportation and good paying local jobs.

We need a development that will not put too much of a burden on our current residents and infrastructure and will promote economic opportunity and economically stabilize the communities housing base. The CURRENT Plan does **NOT** do that.

Current and Future Development Plans

The proposed Peninsula Hospital Development **aka Edgemere Commons** is **ONLY** one development coming to the Rockaways from B69th St to Downtown Far Rockaway. Please see the following information regarding current and future development projects that are also located in the study area and others which are in close proximity or adjacent.

- **Edgemere Urban Renewal Area:** 500 units and approximately 1,515 NEW residents.
- **Arverne East Urban Renewal Area:** 1,200 units and approximately 3,636 NEW Residents.
- **Arverne West Urban Renewal Area:** 800 units and approximately 2,424 NEW Residents
- **Downtown Far Rockaway Urban Renewal Area:** 3,131 units and approximately 9,487 NEW residents

Total Units: 5,631 units and approximately 17,061 NEW residents.

These numbers are **WITHOUT** Peninsula Hospital Site.

- **Peninsula Hospital Site (Edgemere Commons):** 2,200 units and approximately 6,665 NEW residents.

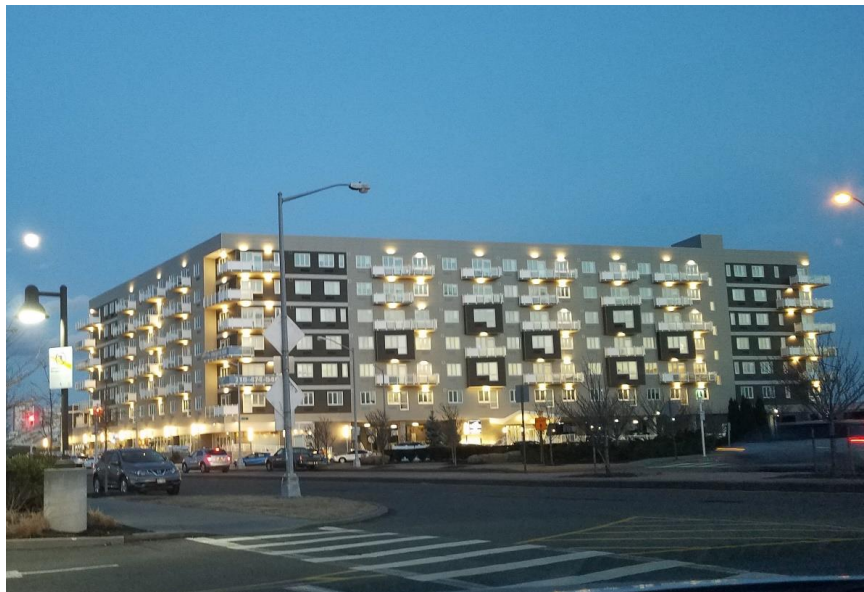
***Grand Total:** 7,831 units and approximately 23,727+
NEW residents in zip code 11692 & 11691*

Rockaway's Affordable Housing Developments

We are not naive and understand there is an affordable housing crisis in NYC and there is a need for affordable housing. In fact, over the last few years the Rockaways has some very successful affordable housing developments which included affordable homeownership which is desperately needed in our community.

Water's Edge Condominium Development: Built less than a decade ago, **131 Units of Affordable Housing Homeownership/Condominiums** in the Beach 60s brought an economic and racial diverse mix of **Moderate-Income First-Time Home buyer families** to the community, economically stabilizing the neighborhood.

Arverne by the Sea: Has been the most successful development to ever come to the Rockaways and has helped transform the Arverne Community from an economically depressed neighborhood with NO economy to a desirable place to live with jobs for the community. It has brought excitement and a mix of families and incomes to the community. Arverne by the Sea contained Market Rate **AND** Affordable Housing up to 120%, and it worked.



Arverne by the Sea, when complete, will be **2,200 units** of housing, the same amount as the proposed Peninsula Hospital Site but it sits on **ALMOST 110 acres**, **NOT 9.35 acres**.

According to the City's **OWN** Studies and Reports that were released not long ago, members of the community and City created the Resilient Edgemere Community Plan where the city stated they will limit new residential developments in vulnerable areas. Additionally, the city and residents prefer **Lower Density Housing** in Coastal Flood Areas and this proposed "With Action" Peninsula Hospital Plan is in contradiction of what the city and community wants.



CREATE RESILIENT HOUSING AND MAINTAIN THE LOW DENSITY FEEL



2. Limit New Residential Development in Vulnerable Areas

The City will limit new housing in vulnerable areas by dedicating City-owned vacant land in the north of Edgemere, along the coast of Jamaica Bay, for non-residential, public uses, such as new open spaces and the development of coastal protection features. The City will amend the Urban Renewal Plan to memorialize this land use change. Concurrently the City will explore zoning and land use tools to limit development on privately owned land in the most vulnerable areas of Edgemere, including parcels north of Norton Avenue, while protecting the rights of current residents and property owners.

Density of Affordable Housing Developments

Far Rockaway Senior Housing:

The Arker Companies has completed a more responsible new senior housing complex at 34-11 Beach Channel Dr. The seven-story building is the first under the city's Senior Affordable Rental Apartments (SARA) program. The 154 units are for low-income seniors, 46 (30%) were reserved for homeless. There is 4,500-square-foot community facility and about 11,000 square feet of retail space.



East New York:

Arker Companies is also building in East New York where they are building **two (2) MID-RISE** buildings with only 200 and 144 **units** of housing.



Why are they only building Mid Rise in an area with lots of jobs near the mall but want to put 19 story high rise buildings here in the Rockaways with limited jobs and economic opportunity for current residents, never mind new residents.

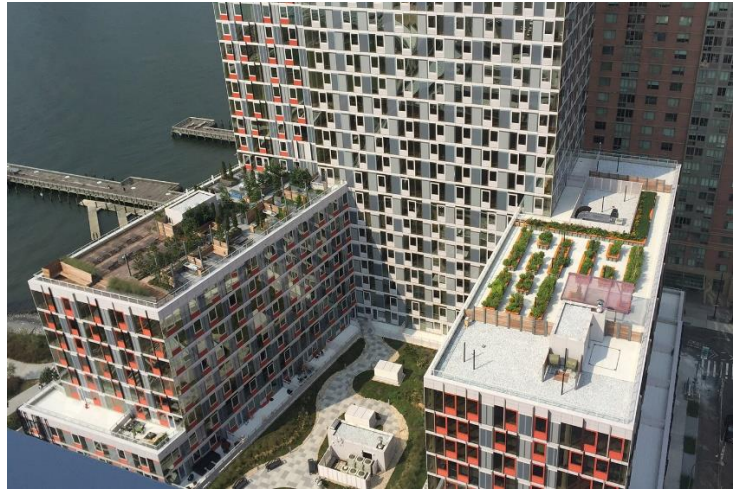
Spaford Redevelopment in the Bronx:

This project is NOT Arker but will include 700 units of affordable housing, ground-floor retail, light industrial manufacturing space and other amenities on 5-acres.



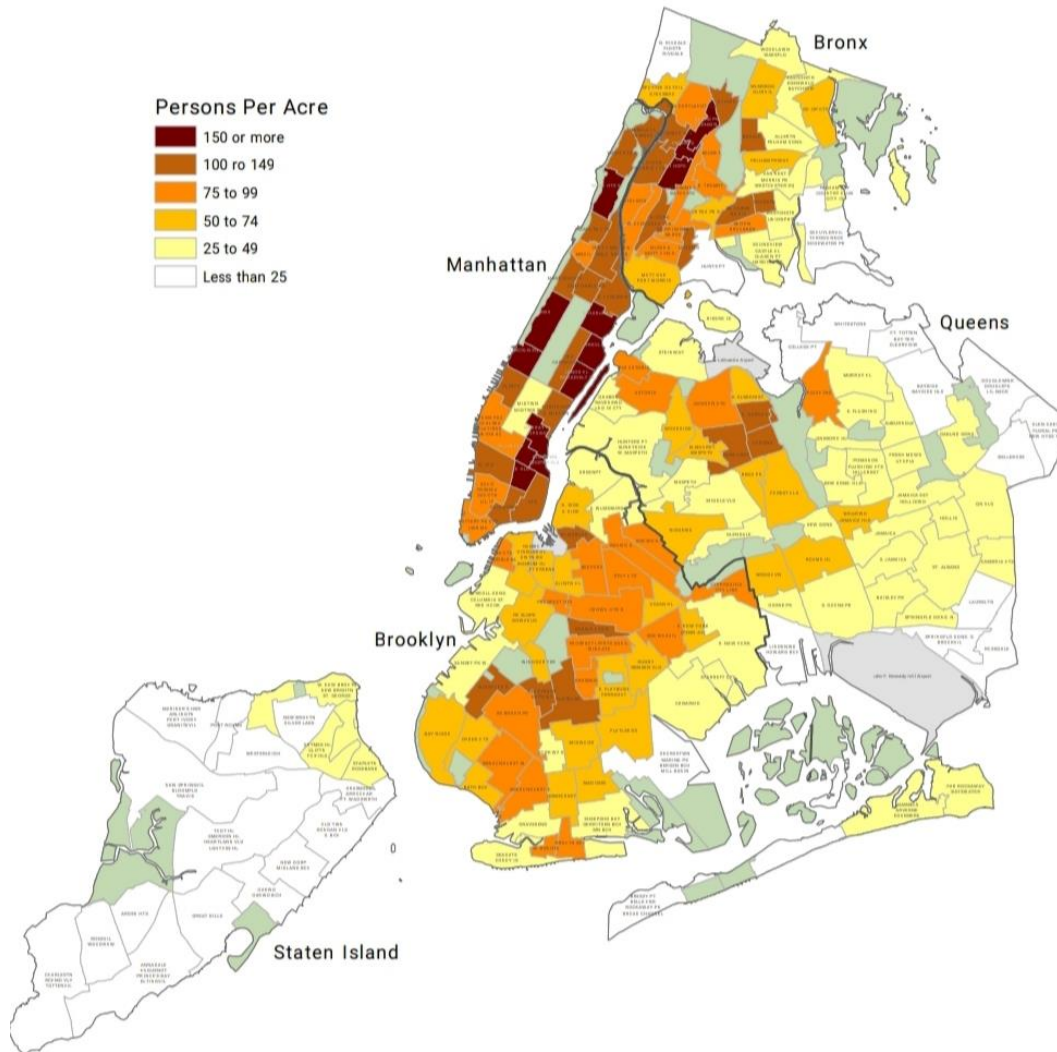
Hunter Point South:

This project is Not Arker but will have up to 5,000 housing units on 30 acres of which **ONLY 60% will be affordable to low/moderate income.** Currently phase II is being constructed and will be a two-towered development with 1,120 apartments total, of which 900 will be designated permanently affordable. Those will be available to residents with incomes ranging from **30 to 145%** of the Area Medium Income (AMI.)



The above information regarding other developments shows the Peninsula Hospital Site plan would be much more densely populated compared to other developments in the Rockaways, and other affordable housing proposals built around the city by the Arker Companies and or other developers. As you can see from the below map the majority of density in NYC is from 25-99 persons per acre. Additionally, when comparing the NYC map on density you can see the area neighborhood density would skyrocket to a ratio of 235 persons per acre which is extremely dense and the map shows.

PL-P2 NTA: Population Density by Neighborhood Tabulation Area*
New York City, 2010



*Neighborhood Tabulation Areas or NTAs, are aggregations of census tracts that are subsets of New York City's 55 Public Use Microdata Areas (PUMAs). Primarily due to these constraints, NTA boundaries and their associated names may not definitively represent neighborhoods.

Source: U.S. Census Bureau, 2000 and 2010 Census Public Law 94-171 Files
Population Division - New York City Department of City Planning

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Affordable Housing

The Arker Companies and politicians are trying to sell this to the community as a Mixed Income Development, when it is NOT. **Only 13%** of the units will be available for Moderate & Middle-Income families and 87% will be for Extremely Low, Very Low and Low Income.

According to the Draft Environmental Impact Statement, under Mandatory Inclusionary Housing MIH (**SEE BELOW**) the Arker Companies has a few options available to them when it comes to how many Affordable Housing Units **MUST** be built.

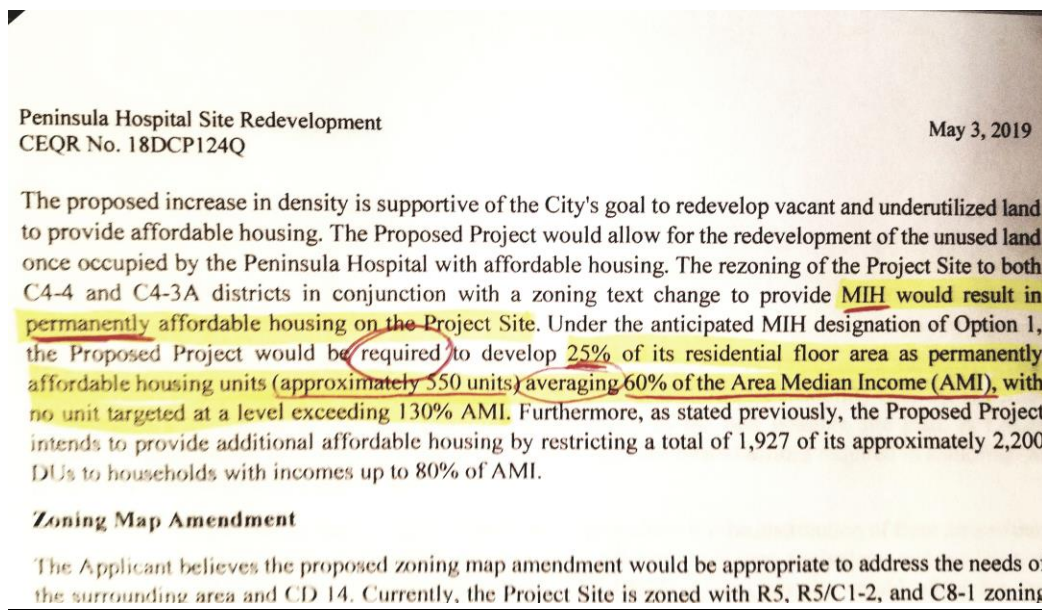
Arker Selected Option #1

Option 1: Would **REQUIRE 25%** of residential floor area (**550 units**) to be permanently affordable for residents with incomes averaging **60% AMI**.

They could go with Option #2 which would build 110 more units of Permanent affordable housing which would provide the development with a better balance of incomes and bring disposable income into the community which is desperately needed to ensure the long-term vitality and stability of the community.

Other Options Available to Builder that should be considered

***Option 2:** Would require 30% of residential floor area (**660 units**) to be permanently affordable for residents with incomes averaging 80% AMI. Much more of what **OUR** Community needs.





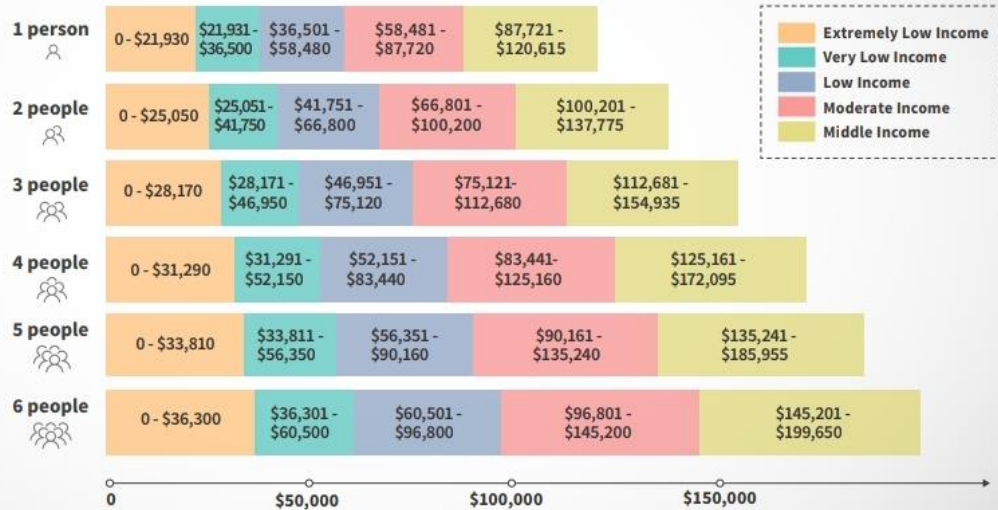
Does my income qualify me for affordable housing ?

NYC creates affordable housing opportunities for households at a wide range of sizes and income levels.

This chart helps explain the income categories that we use, which vary by household size, so you can see where you and your family fit in:

Affordable housing is based on a household's percentage of the area median income (AMI), which is set by the federal government. Housing is considered affordable if it costs about one-third or less of what the people living there make, and is regulated so the rent can't go up dramatically over time. The numbers on this chart reflect 2018 AMI levels.

Eligible Income Levels by Household Size



If your income fits in this chart, register for Housing Connect today so you can apply for housing opportunities that are affordable for you: nyc.gov/housingconnect



Income Band	Percent of AMI
Extremely Low-Income	0-30%
Very Low-Income	31-50%
Low-Income	51-80%
Moderate-Income	81-120%
Middle-Income	120-165%

Of the proposed 2,200 units, 1,910 (87%) are being allocated to the following:

1. Extremely Low Income 0-30% AMI
2. Very Low Income 31-50% AMI
3. Low Income 51-80% AMI

Remember minimum wage is \$15 an hour.

Few different scenarios to show you who qualifies for ONLY 13% of the apartments.

1. Working couple each make a little over minimum wage, \$16.50 hr. they would only qualify for 13% of the units.
2. Single mother MTA worker makes \$60K a year lives with her infant son and mother who collects \$1,500 a month in social security would only qualify for 13% of the units.
3. Married couple police officer and teacher both with 3.5 years employed and have two children would only qualify for 13% of the units.

The people in these scenarios mentioned are not rich, they are struggling new Yorkers and usually make too much to receive any govt assistance or subsidies and are also rent burdened. By only allowing 13% of the units for moderate and middle income families as mentioned and 87% for Extremely Low, Very Low and Low it will only create further concentrated poverty which will further economically and racially segregate the Rockaway community.

Moving more zoning power to the state level has the potential to make a powerful impact on New York's ability to create and preserve affordable housing. But moving to a higher level of government is not sufficient to address segregation: any new land use policy must make a specific effort to undo racial and economic segregation and prevent it from harming the communities it seeks to rebuild. An effective policy must ensure that municipalities do their due diligence to affirmatively further fair housing and do not further exacerbate the poverty and community disinvestment in racially or ethnically concentrated areas. Without an explicit plan for inclusion, we invite history to repeat itself.



Lorraine Y. Collins is the Director of Public Policy and External Affairs at Enterprise Community Partners, Inc. New York Office.

According to a report by the New York City Planning Commission during the Arverne Urban Renewal EIS Calendar No. 2 C 030509 HUQ, **Half of the subsidized housing in Queens was located on the Rockaway Peninsula and construction of additional low and moderate-income housing in Arverne would only increase the proportion. **

IMPORTANT: Just a few years ago, Community Board #14 **OPPOSED** any affordable housing developments that **DID NOT** have AMI of 60% or higher and supported an emphasis be put on **Home Ownership, preferably market rate.**

THIS PROPOSED DEVELOPMENT **DOES NOT** PROVIDE AFFORDABLE HOUSING **HOME OWNERSHIP,** EVEN THOUGH IT IS DESPERATLY NEEDED TO STABALIZE THE AREA.

IMPORTANT INFO from DEIS:

4,107 (83%) of the TOTAL 4,908 dwelling units in study area are publicly funded.

4,076 (93.6%) of the occupied 4,356 dwelling units are renters.

280 (6.4%) of the occupied 4,356 dwelling units are owner occupied.

FROM RECENT NYC PLANNING REPORT: A high concentration of public and publicly subsidized housing and long-term care facilities are also present in the surrounding area.

During the Arverne Urban Renewal Studies the City Planning Commission noted that that over the years the Rockaway has been the site for a number of public housing units and government sponsored partnership housing and that the introduction of market rate housing was needed. The current plan put forth would NOT serve as a balance for the area if only 13% of the units would be for moderate- and middle-income households and 87% would be for low, very low and extremely low-income households. This would NOT be a well-balanced comprehensive planning strategy as it further creates concentrated poverty and would not lead to commercial vitality.

According to an additional report put out on **April 2016** by **Mayor De Blasio's Office of Environmental Remediation**, the following facts apply to the Rockaways:

- Edgemere, Arverne, and Hammels are now home to a fairly dense community with a high proportion of low-income residents. **(Adding more lower income will only exacerbate the issue. There is a need for moderate and middle income families to better balance community incomes)**
- At 16% the unemployment rate of the Hammels-Arverne-Edgemere NTA is more than five percent higher than the rest of the peninsula, Queens (9.6%) and New York City (10.2%). **(Adding 300+ new jobs as in the EIS for 6,500+ New residents won't reduce the unemployment rate)**
- Approximately 30% of residents in the Hammels-Arverne-Edgemere are living in poverty. This represents a much greater share of residents living in poverty than the rest of the peninsula and New York City (20%). **Adding additional lower income housing will NOT fix this problem as most residents are already receiving a subsidy and live in protected housing as per the EIS.**

- The median household income of residents of the Hammels-Arverne-Edgemere is \$39,373. This is significantly less than the median incomes of residents of the Rockaway Peninsula (\$48,171), Queens (\$56,780) and New York City as a whole (\$51,865). **(Bringing in new residents with higher incomes will help strengthen the income levels of the community).**

Bringing in Affordable Homeownership Homes or Condos would help Stabilize the community **WITHOUT** the displacement of current residents

Gentrification

Over the years, gentrification has improved many communities throughout the city however it has become an evil word as it has also displaced many lower income New Yorkers from the same neighborhoods it has improved. Some are concerned if you put homeownership, market rate housing or rentals for the middle class in the area that there will be “**Gentrification**” or displacement of original residents who may have been here for many years. This is **NOT possible** as the Draft Environmental Impact Statement clearly states the following about the subject area.

1. There are 4,908 dwelling units in the studied subject area, 183 (3.5%) of the dwelling units **may** be vulnerable to possible displacement.
2. Almost **85%** of the residential dwelling units in the subject area live in publicly funded housing. **(These residents are subsidized and have protections in place to prevent displacement).**
3. There are 280 owner occupied units (6.5%) in the subject area. **(Not subject to displacement).**

Rent Burden: According to DEIS the population in Queens CB 14 has been increasing, (*Just like every community around the city*) and approximately 44% of households are rent-burdened, meaning they pay more than 30 percent of income toward rent. However, they forgot to mention that the subject area in Rockaway has some of the more reasonable rents in comparison to other areas of the city. And the rent burden is the same as the city wide average, according to the Citizens Budget Commission, which recently released the New York City Housing and Vacancy Survey, which shows that 44% of ALL New York households are rent burdened.

Community Preference Policy

When affordable housing is built, there is a lottery to determine who gets the apartments. In that lottery system there is a policy of the city to provide 50% of the units for residents of the community. This policy is called community preference. I myself have lived in Affordable Housing and it provides residents with a safe affordable place to call home. Whatever is built, we should all want it to serve and benefit current Rockaway residents. However, whether we agree with community preference policy or not, there is currently a lawsuit, pending against the City of New York claiming that the local community preference policy further segregates communities of color and also keeps out prospective lottery applicants of color from white communities in violation of the Fair Housing Act. If they cannot guarantee this community preference to local residents, why is the builder and local politicians promising residents the benefit of community preference when there is a good possibility that our residents may NOT get any community preference?

Health Care

The Draft Environmental Impact Statement states the proposed project would NOT result in the creation of a sizeable new neighborhood where none existed before Consequently, a detailed analysis of indirect effects on health care facilities is NOT warranted. **Are they kidding!!**

How dare they say the proposed project would NOT result in the creation of a sizable new neighborhood. Since when is 6,500+ NEW residents not a sizable new neighborhood?? Look at the OLD EIS With regards to the Arverne & Edgemere Urban Renewal Areas. And now the community has one less hospital.

IMPORTANT: More than 2,600 acute care hospitals were evaluated in the NATIONWIDE Leapfrog Group's spring 2019 hospital safety evaluation. There were nine hospitals that received an "F" grade placing them in the **bottom 1%** of hospitals and of course St. John's Hospital was one of them and was also the ONLY F grade of the 45 NY hospitals graded. This is now the **only acute care hospital in the area.** <https://www.hospitalsafetygrade.org/h/st-johns-episcopal-hospital>

The “**With Action**” plan of Peninsula Hospital site along with all the other new developments planned and being built in the community will bring over 25,000+ new residents and we will have only one failing hospital for a vulnerable and underprivileged community.

Also, according to a report by the NYS Comptroller in March 2018 the average Emergency Room wait before being seen for a diagnostic evaluation is 50 minutes which is **more than twice the statewide average.**

They NEVER did a study/analysis to how this will affect our community!!

Schools

The new proposed development would bring in approximately **1,500 school age children**. Many of the local schools in the Rockaways are already **LOW PERFORMING AND** close to or over 100% capacity. As per city records, The closest school PS/IS 105 on B54th St is at 112% Capacity. Also, local school PS 106 on B35th St is at 134% capacity.

Peninsula Hospital Site Redevelopment
CEQR No: 18DCP124Q

The Future with the Proposed Actions (With-Action Condition)

Enrollment Projections

As described in Chapter 1, "Project Description," the Proposed Project is anticipated to result in the incremental development of 1,431 non-senior DUs. Based on the CEQR generation rates, the Proposed Project would introduce approximately 444 public elementary school students, 200 public intermediate school students, and 186 public high school students (see **Table 4-6: Public School Threshold Calculations**).

Table 4-6: Public School Threshold Calculations

	Net Increase in DUs from Proposed Project	Multiplier (Students/Unit in Queens*)	Additional Students from Proposed Project	Threshold for Detailed Analysis
Elementary/ Intermediate School Students	1,431	0.31	444	50 (combined)
	1,431	0.14	200	
High School Students	1,432	0.13	186	150

*Source: * SCA "Projected Public School Ratio", released November 2018*

Capacity Changes

The Proposed Project is not anticipated to provide additional capacity on the Project Site for public schools.

Analysis

Elementary Schools

As shown in **Table 4-7: School Enrollment, Capacity, and Utilization for With-Action Condition, 2034**, elementary schools in CSD 27, Sub-district 1 would continue to operate with a shortfall of seats in the 2034 With-Action condition. The sub-district would operate with a 135.21% utilization rate and a deficit of 1,991 seats. The collective utilization rate in the With-Action condition would increase 7.85% from the No-Action condition utilization rate of 127.36%. SEVERE

Since the collective utilization rate for public elementary schools in the With-Action condition would be greater than 100% and the collective utilization rate would increase more than 5% from the No-Action condition, the Proposed Project would result in a significant adverse impact on elementary schools.

Intermediate Schools

As shown in **Table 4-7**, intermediate schools in CSD 27, Sub-district 1 would continue to operate with a shortfall of seats in the 2034 With-Action condition. The sub-district would operate with a 101.58% utilization rate and a deficit of 46 seats. The collective utilization rate in the With-Action condition would increase 6.93% from the No-Action condition utilization rate of 94.65%.

Since the collective utilization rate for public elementary schools in the With-Action condition would be greater than 100% and the collective utilization rate would increase more than 5% from the No-Action condition, the Proposed Project would result in a significant adverse impact on intermediate schools.

If this “**With Action**” plan gets approved by the City Council, it will continue to marginalize the Rockaway community, especially the underprivileged children in the Rockaways’ poorest communities. When this development is complete it will leave a deficit of almost 2,000 elementary school seats (See Above) and the elementary schools will be operating at 135% of capacity. This type of overcrowding leads to poor performing schools and does not provide the children of the Rockaways with the opportunities they deserve.

IMPORTANT: There is NO funding in the current budget or plans to construct a new public school and NYC has reached its MAX on Charter schools. The Draft (EIS) Environmental Impact Statement report even says this proposed development would have **Significant Adverse Impact** on both Elementary AND Intermediate Schools in the Section of the Rockaways, as well as Significant Adverse Impact on publicly funded group childcare AND Head Start centers.

IMPORTANT: We all know local Arverne by the Sea residents were promised a new school **over 12 years ago and they are still waiting for it to be built.**

THE COMMUNITY NEEDS AT LEAST TWO NEW SCHOOLS TO MAKE UP THE SHORTAGE OF THE 2,000 SEATS OR A DRAMATIC REDUCTION IN THE AMOUNT OF UNITS

Transportation:

This Area of the Rockaways has the worst public transportation in ALL of NYC and its residents have the longest commute times of any neighborhood and this is clearly documented in “**An Economic Snapshot of the Rockaways**” (March 2018 <https://www.osc.state.ny.us/osdc/rpt13-2018.pdf>)

Rockaway is very much a vehicle dependent community, not just to commute to work, but to also get around our own community to shop locally and also visit family

& friends across the peninsula, because of the poor public transportation and long commute times.

This “**With Action**” plan would ONLY provide residential parking for 754 units, which is less than 35% when the current zoning would require parking for 85% of the units. As a community that is isolated from the rest of the city and parts of Long Island, we should not allow for any reduction in the current 85% parking requirement.

In addition, the “**With Action**” plan will have a severe adverse impact not only on our roads, but also our subway and bus service. The additional residents would cause significant adverse bus line-haul-related impacts on the Q22 Rockaway Beach Boulevard – Beach Channel Drive bus and the Q52-Select Bus Service (SBS) bus. The Q22 bus would operate above capacity in the westbound direction in the Weekday AM and Weekday PM peak hours, and the Q52 SBS bus would operate above capacity in the northbound direction in the Weekday AM peak hour and in the southbound direction in the Weekday PM peak hour.

NOTE: The proposed with action plan and the other new developments mentioned previously in this presentation will bring **OVER 25,000+ NEW residents to the Rockaways** and create all kinds of direct and indirect transportation issues for current residents across the peninsula.

Economic Opportunities

This development when complete will bring 350 jobs mostly in retail, medical and community space. Currently, there already is very high unemployment in the area and bringing in 6,500+ new residents and creating minimal job opportunity will not correct the high unemployment rate and area median income. In addition to the jobs mentioned there will be a creation of construction jobs. But what kind of jobs, how many? What percentage of locals will be hired? Do the residents have the skill set to do them?? The “**With Action**” approval the developer will get all the funding from the city to build, as well as tax incentives from City, State and Feds. With approval, the builder will make out like a fat rat and the community will be left with the crumbs.

When Stop and Shop in Arverne by the Sea opened, it created roughly 160 part time jobs and the store is 55,000 Sq ft, which is much larger than the proposed Western Beef, which the Arker Companies does not even have a signed agreement with yet.

HPD Development Funding Programs

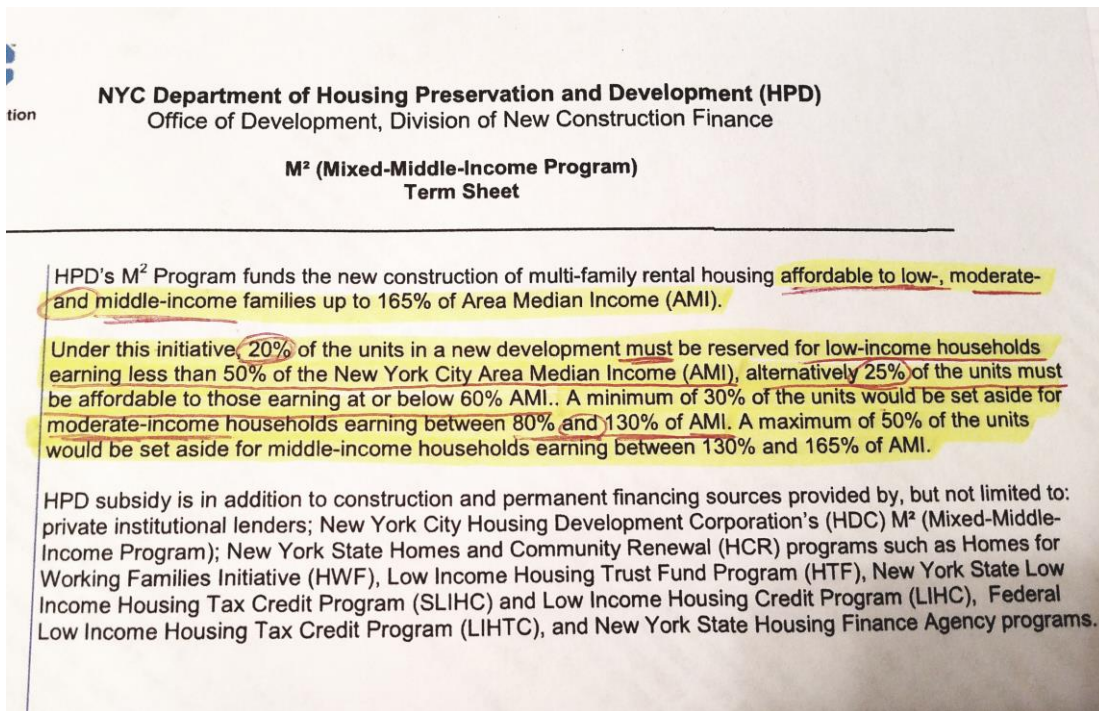
The Arker Companies **MUST** rely on **Taxpayer Funding** from the City of New York to build. There are MANY Housing Preservation & Development (HPD) programs available to builders which provide incentives from NYC to build low income affordable housing. They also have access to other programs which they are NOT taking advantage of.

Arker is looking to secure NYC Taxpayer Funding from the 3 following HPD Programs SARA, ELLA and Mix and Match. There is also other real estate development (HPD) programs and funding sources available to the Arker Companies, **BUT THEY ARE NOT TAKING ADVANTAGE OF THEM, WHY NOT???**

These other programs **BELOW** would better fit the needs of our community by ensuring a **better balance of income** is brought to the community and the development is not mostly geared towards the Extremely Low, Very Low, and Low Incomes (**1,910 units 87%**) as currently being sought. It would also benefit the community if some of the units are Affordable Housing **HOMEOWNERSHIP** as the community board has requested in the past. We **MUST CHALLENGE THEM AND Local Politicians** to ensure they secure some of this other funding programs to ensure there is a much better balance of incomes AND housing units for local residents to purchase.**

Additional Funding That Could Be Secured

A. Mixed Middle Income (M²):



M2 Mixed Middle Income Program: Program funds the new construction of multi-family rental housing affordable to low-, moderate- and middle-income families up to 165% of Area Median Income (AMI). Under this initiative, 20% of the units in a new development must be reserved for low-income households earning less than 50% of the New York City Area Median Income (AMI), with at least 15% of these low-income units set aside for very low-income families earning less than 40% of AMI. A minimum of 30% of the units would be set aside for moderate-income households earning between 80% and 100% of AMI. A maximum of 50% of the units would be set aside for middle-income households earning between 130% and 165% of AMI.

CHECK LINK FOR TERM SHEET. <https://www1.nyc.gov/assets/hpd/downloads/pdf/developers/term-sheets/m2-mixed-middle-income-term-sheet.pdf>

B. New In fill Homeownership Opportunities Program (NIHOP): Promotes the construction of new homes affordable to New York City’s workforce community. **CHECK LINK FOR TERM SHEET**
<https://www1.nyc.gov/assets/hpd/downloads/pdf/developers/term-sheets/NIHOP-Termsheet.pdf>

C. Neighborhood Construction Program (NCP): Funds the new construction of infill rental housing with up to 30 units affordable to low, moderate- and middle-income households earning up to 165% Area Median Income (AMI). **CLICK LINK FOR TERM SHEET.**
<https://www1.nyc.gov/assets/hpd/downloads/pdf/developers/term-sheets/NCP-Termsheet.pdf>

- **Open Door Program:** funds the new construction of cooperative and condominium buildings affordable to moderate- and middle-income households. **CLICK LINK FOR TERM SHEET AND MORE DETAILS:**
<https://www1.nyc.gov/assets/hpd/downloads/pdf/developers/term-sheets/open-door-term-sheet.pdf>

IMPORTANT: These Four (4) additional funding programs are available for the developer to take advantage of and would be beneficial to OUR community by allowing more moderate-income families and allowing middle income families to be included as well as making some units affordable housing for purchase WITHOUT Displacement of current local residents.

However, they are choosing to NOT take advantage of these funds. WHY??

I want to thank you for serving as a member of the NYC Planning Commission and taking the time to read and understand the concerns members of the community are trying to convey. We should all embrace change, and we shouldn't be satisfied with the status quo. As reasonable and pragmatic people we understand the city is going to higher density development and there is a need for affordable housing. However, that does NOT mean we should just accept what the developer has presented, because at the end of the day this is a business for them and it's about them making the most money possible and we will have to live with the results and they don't. Yes, we will all be happy to see this land finally developed. Yes, we will be happy to see it will bring retail opportunity and community space. Yes, we should be happy to see there will be affordable housing. However, those positives come with MANY direct and indirect adverse impacts on our residents. I am submitting the below recommendations based on my experience as a lifelong resident of the community, my life experience as a Lieutenant in the NYPD, my experience as the owner of a couple small business in the community, my experience as a Real Estate Broker, my experience as a civic leader and my experience as the Arverne by the Sea Homeowners Association President, I am urging you to ensure that significant changes are made that are in line with the below recommendations and those of Community Board #14 and Queens Borough President to better suit the long term needs of the community and provide true benefits to our residents.

Recommendations:

Density: That no more than 1,363 units be built, as this will be a 140% increase compared to the current as of right and would allow the developer to ensure they can build in a sustainable housing with retail. With this number of units, it will still become the densest section of the peninsula as it is in close proximity and adjacent to Ocean Bay Apartments, Ocean Side Apartments, Nordac Houses, Arverne View, Beach Green Dunes, Beach 41 St Houses, ect.

Affordability: Affordable housing is desperately needed across the city and this development can be 100 % affordable housing and nobody has an issue with that. However as mentioned the area already has a high concentration of poverty, subsidized, public housing, nursing homes and rehabilitation centers.

The area would be better served with Option #2 under Mandatory Inclusionary Housing NOT Option #1 as it would ensure more Permanent Affordable Units and at the same time ensure the LONG-term vitality of the community without the displacement of any current residents. Additionally, the area has already had significant affordable housing built and currently under construction.

Affordable Homeownership: We all know homeownership is the American dream and the key to building wealth. This community is in desperate need of affordable homeownership for many of the residents who want to own their own home and stay in the community they were raised. Affordable Homeownership will stabilize the community and ensure the long term vitality as over 93% of the occupied units in the subject area are renters and 83% of the renters are publicly funded.

Parking: The Rockaways is a unique community due to its geographic location and isolation from the rest of the city. It is also unique in that it borders Long Island and provides limited public transportation to other neighborhoods in Queens, Long Island, Bklyn and other areas of the city. During the 2008 Rockaway rezoning Community Board #14 requested higher parking density than the zoning allowed since we are such an isolated peninsula with limited transportation options to get to work and school. As the Rockaway peninsula grows in popularity especially during the summer months parking is at a premium and by reducing housing density it would solve two major concerns, one of them ensuring there is adequate parking for 60% of the residential units being built which is still less than current zoning which was implemented after 2008 rezoning.

Again, I thank you for your time and if I can be of any assistance or answer any questions with regards to this presentation please feel free to contact me.

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