



**Comments on the Willets Point Development Plan Generic Environmental Impact
Statement Draft Scope of Work
May 14, 2007**

The following comments were made upon review by the Municipal Art Society of the Willets Point development plan GEIS draft scope of work. These comments are intended to support and assist city agencies to conduct as full a review as possible of the impacts emanating from the reasonable worst-case development scenario, as well as to guide the inclusion of additional development options that would satisfy the stated development framework while reducing impacts.

Site Description

The draft scope does not include the number of jobs provided by existing businesses.

Project Objectives

The draft scope refers to the creation of an urban renewal area that will provide new affordable and market rate housing. The scope does not define either “affordable” or “market rate”; nor does it specify the criteria that will be used to determine income requirements.

Proposed Actions

De-mapping of public streets will result in additional available development rights. The draft scope does not include an analysis of how much additional FAR results.

The permanent de-mapping of streets, as alluded to, results in a substantial square footage loss of publicly-owned property. The draft scope should justify this loss.

The “possible condemnation of property” would indicate that the project serves a public purpose. The draft scope should describe this public purpose in detail.

The final scope should include a plan for the disposition of property to multiple owners and developers, as opposed to a single developer.

Proposed Project

The goals of the development plan refer to providing a significant number of quality new jobs for area residents. The final scope should provide a count of those jobs and a complete analysis of the nature, permanence, and quality of those jobs, and their

availability both to local residents and to those workers displaced from current Willets Point businesses.

- *Retail*: the retail component described in the draft scope makes no reference to how existing retailers in Corona and Flushing could benefit from an expanded customer base arising from hotel and convention center users.
- *Convention center*: while demand for hotels is adequately supported in the draft scope, there is no similar evidence presented of a need for a new convention center in Queens.
- *Open space*: while the draft scope notes that the open space will be publicly accessible, the diagram indicates that the park space will be limited to a small triangle of space in the center of the development. The final scope should indicate how the public would access the open space.

The Framework for environmental review notes a build-out assumption of 2009-2017. The final scope should be more specific as to which project components will be built when.

Task 3

The final scope should begin to enumerate the public costs of the project, including, but not limited to: the costs of site acquisition; the costs of remediation, and the costs of required infrastructure. Without feasibility findings, there will be no way to determine public benefits such as the number of affordable housing units in comparison to the real costs paid by taxpayers.

The final scope should include a direct analysis of land use patterns and site utilizations in the project areas, as opposed to depending on studies that have already been conducted in the past.

The final scope should analyze the loss of manufacturing space in relation to PlaNYC 2030, which calls for significant increases in public transportation. Public transit yards need to be sited in M-zones; how does this plan relate to a more comprehensive plan for the city's manufacturing zones?

Task 4

The draft scope notes that an analysis will reveal “adverse effects on a specific industry.” In the case of Willets Point, the concentration of auto uses constitutes an industrial synergy that is unique, and not likely to be duplicated elsewhere. The final scope should detail the efforts to relocate these uses, including accommodating them in the city's Industrial Business Zones. It is more likely that these businesses will decentralize, locating to less affluent neighborhoods. The final scope should include an evaluation on the decentralization of “pollution points” to neighborhoods that already host these uses.

The final scope should assess the disproportionate loss of jobs currently accessible to immigrants who are local residents, and the multiplier effects of job losses in Corona and Flushing local economies. Job losses emanating from changes of use to Willets Point may result indirectly in residential displacement. The final scope should also include a health

survey of existing workers, to assess whether long-term exposure to environmental hazards has resulted in medical complications for workers.

Task 5

The study on the need for or the addition of any community facility, especially public schools or day care facilities, should be analyzed in detail, keeping in mind that the proposed site is toxic and that children have a heightened susceptibility to toxins. The study should include a proposed cleanup and remediation plan, as well as a monitoring plan, for the potential toxins that could be present in such schools or day care facilities.

Task 9

The Draft Scope states that with regard to factors affecting neighborhood character, “[m]ost of these elements will already be covered in other GEIS sections and, therefore, this GEIS section will essentially represent a summary of the key thoughts of these other analyses.” It is unsatisfactory to just include a summary discussion of other sections and patch them together into a GEIS analysis of neighborhood character. The studies conducted in the other impact categories were not analyzed in light of neighborhood character—they were analyzed in light of that impact category. Therefore, it is insufficient to rely upon the “key thoughts” in the analyses of other impact categories.

There is tremendous potential that the proposed actions will have a significant effect on the neighborhood character. Under the proposed plan, it is likely that the Willets Point area will completely lose its industrial character, a quality that currently defines this neighborhood. The significance in the change in the neighborhood, including the addition of new residents, businesses not related to the auto industry, and a convention center, will change the face of this neighborhood. This effect on neighborhood character must be individually and fully studied in the EIS, and not simply summarized.

Task 11

The final scope should include an analysis of increases to build-out costs that are due to flood-proofing measures.

Task 12

The final scope must include the results of testing on sites other than sidewalks and streets, from which reliable extrapolations about contamination cannot be made.

Task 16

The DGEIS should include an analysis of the current and future capacity of the 7 train and the LIRR to add this significant amount of transit users. EDC should work closely with MTA at the outset to ensure the future growth of the area could accommodate future users. EDC should include in the DGEIS a plan for encouraging the use of public transportation.

Task 22

The Planning Center’s comprehensive analysis of manufacturing districts throughout the city laid out several recommendations for balancing manufacturing uses with residential

and commercial uses, including rezoning of those manufacturing districts which have experienced a substantial amount of residential growth and change of use.

The Willets Point area, however, is an active manufacturing district that supports as many as 2,500 jobs. Given this concentration of manufacturing uses and the opportunities presented to increase manufacturing jobs in the district through incentivizing high-performance uses, the following alternative should be considered:

The final scope should include, in addition to the Commercial Alternative that focuses on office and retail, a Manufacturing Alternative, that allows for the retention of high-performing automotive and manufacturing uses, provides a continuing supply of M-zones for uses resulting from PlaNYC 2030, and includes space for an incubator for research into alternative fuel generation and “green” automotive care, as well as a trade school that emphasizes training for the site’s existing workers.

Task 24

The final scope should include Growth Inducing Impacts.