



**Comments on the Draft Scope of Work
for the Draft Environmental Impact Statement
by Queens Community Board 13 and Queens Civics United**

July 18, 2024

I submit these comments on behalf of Queens Community Board 13 (QCB13) and the community of eastern Queens represented by the civic associations of Queens Civics United (Please see list below.) on the Draft Scope of Work (DSOW) for the Draft Environmental Impact Statement (DEIS) for what you choose to call the “Creedmoor Mixed-Use Project.”

A group of fellow civic leaders met following Empire State Development’s release of this draft project scope. We found this scope essentially changed very little from the proposal (Misnamed the “Creedmoor Community Master Plan” since it failed to follow community recommendations.) released last winter nothing – other than reduce by minuscule numbers the overall units (to 2,775) and similarly a minuscule parking increase (to 3,200). Queens Community Board 13 and the Community strongly and smartly recommend no more than 1,000 units. That is the proper amount of density for this site in our eastern Queens community.

Further the only “alternative” proposed for review in the DSOW is a “No-Action Alternative.” This fails to comply with the New York State Environmental Quality Review Act (SEQRA). As stated on page 38 of the DSOW, “SEQRA requires that alternatives to the proposed project be identified and evaluated in an EIS so that the decision-maker may consider whether alternatives exist that would minimize or avoid adverse environmental effects.”

This failure to include our Community Plan means we still face a grossly out-of-scale project for this community.

The DSOW not only fails to study our 1000 unit recommendation, it raises additional concerns that merit attention.

The information disclosed in the DSOW includes:

- *a project to be developed beginning in 2027 in four or more phases over 12-14 years concluding some 16 years (2040) from today; this raises questions of ongoing construction impacts in a residential community for too long;

- *the practical nature of construction suggests supportive housing pieces happening first as potential residents of the various regular units would shun living near/in any ongoing construction site.

- *based on this schedule provided, the intended 2,775 units ESD envisions will NOT relieve any alleged housing crisis anytime soon.

In contrast, the QCB13 plan that follows the community recommendation for no more than 1000 units meets the previously identified housing needs of Queens Community Board 13 and the eastern Queens community AND can be realized within several years; it would bring needed housing on line much sooner than the timeline proposed in the DSOW.

We seek to clarify our that our low-density development requirement conforms with the existing R3-2 zoning that would apply absent the permissible ESD “override.”

Further, it remains important to note as the scope does on page 5 (Figure 2), significant OMH and OPWDD operations including supportive housing already are concentrated on the campus. Similarly Queens Community Board 13 is acknowledged as oversaturated for many diverse forms of supportive housing. Queens Community Board 13 and the community find any additional supportive housing proposed as part of the so-called Mixed Use Project would exacerbate that existing oversaturation. This was consistently raised by community leader stakeholders at almost every ESD community outreach session. The DSOW and DEIS needs to consider the impacts of introducing more supportive housing in a community already oversaturated, both throughout the community board and on and in the immediate vicinity of the Creedmoor campus.

Housing affordable to our community as outlined in our plan remains an important concern. Eastern Queens already enjoys many forms of affordable ownership and rental opportunities, including many thousands of units proximate to the Creedmoor campus; this includes co-operative housing proximate to Creedmoor that consistently provides some of the most affordable housing-ownership opportunities available in the City of New York.

In line with Area Median Income (AMI), we recommend 80-120% AMI (defined as Moderate Income) or 121-165% AMI (defined as Middle Income) as a floor consistent with our affordability concerns and goals.

In conclusion, unlike the state scheme, this community board/civic plan DELIVERS new housing with some immediacy. 1000 units **now** make a difference over a plan that even if approved extends more than a decade over **four** gubernatorial elections and thus faces possible changes in priorities and visions.

As such, any failure to include this plan in the DSOW and DEIS would be a travesty of sound policy and the public good.

Thank you for your consideration.

For Queens Community Board 13:

Corey Bearak

Chair, Queens Community Board 13 Land Use Subcommittee on Creedmoor

This above is joined by:

Bellerose-Commonwealth Civic Association

Bell Park-Manor Terrace Co-op

Creedmoor Civic Association

Glen Oaks Village Owners, Inc.

Hollis Hills Civic Association

Lost Community Civic Association (of Floral Park
and New Hyde Park)

North Bellerose Civic Association

Queens Civic Congress

Queens Village Civic Association

Rocky Hill Civic Association

Royal Ranch Civic Association