

Response to Downtown Far Rockaway Draft Environmental Impact Statement

Submitted by Eugene Falik on behalf of the Bayswater Civic Association

This document is a response to the proposals made by the New York City Economic Development Corporation and the New York City Department of Housing Preservation & Development (collectively the City in this document) to “revitalize” the Far Rockaway Village (Downtown Far Rockaway in their terminology). It concludes that their proposals are misguided and will not have the desired result but will adversely impact the area for generations.

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Executive Summary

The New York City government, at the urging of Council Member Donovan Richards (31 CD) asked Mayor de Blasio to undertake a program to revitalize the downtown Far Rockaway area which local residents refer to as “Town” or the “Village.” The mayor committed \$91 million in addition to funds already committed to reconstructing the Far Rockaway branch library and assigned the project to the NYC Economic Development Corporation and the city’s Department of Housing Preservation and Development (HPD).

Several public meetings were held in which the community raised a number of issues which it felt were critical to revitalizing the Village. These matters primarily focused on access to Town and parking once there.

The City responded with a plan that identified five Goals and a Roadmap for Action to achieve those goals. The City presented a Draft Scope of Work document in which it proposed an urban renewal designation for part of the downtown Village area and rezoning to permit the construction of some 3,300 apartments with approximately 8,000 new residents. No final Scope of Work was made available, but the Draft Scope was followed by a Draft Environmental Impact Statement (DEIS). Again, there was no final EIS, but, land use decisions under the ULRP procedures are to be made based on these draft documents, PowerPoint presentations and verbal narratives (none of which are included in the official documents).

The City’s proposals are, essentially, to widen sidewalks, narrow roadways, create open “plazas” eliminate public parking and build some 3,300 additional apartments to “unlock” the “potential.”

There are several problems with these proposals, starting with such language as to “unlock” the “potential.” The meaning of the terms has never been defined to the community, but it appears to mean building as much as possible in the smallest possible area.

The proposal assumes that the new residents in this area will naturally shop in Far Rockaway rather than the Five Towns, but the City’s planners offer no reason to believe that is a likely outcome. There is already a substantial “market rate” population in the Bayswater area to the west of the area and another in the Reeds Lane / West Lawrence area to the east. Almost no one shops in Town (a/k/a The Village). They shop in the Five Towns or Rockaway Turnpike, areas readily accessible by car with adequate free or inexpensive parking. It is similarly likely that residents of the new apartments will shop there. Thus, the City plans to spend over \$100 million (including the library) to subsidize Nassau County! Truly the height of stupidity.

There is talk in the report that Far Rockaway’s status as a transit hub must be improved, but not a word as to how that will be accomplished.

The proposal’s shortcomings:

- It fails to address the excessive travel times into and through the Village.

- It fails to address the hundreds of parking spaces occupied by city vehicles and employees.
- It fails to address the need for public parking at a competitive or better price than the Five Towns (long term, low cost, or free). Instead, it supposes that people will park underground in commercial, high cost private garages. And, since it supplies less than one parking space per apartment, it will result in additional demand for on street parking.
- It fails to improve mass transit.
- It fails to address the security concerns that have caused people to flee the area.
- It fails to explain why the new open areas will benefit the community when the existing areas, such as the passage between Beach 20th and Beach 21st Streets have merely become an area for kids to hang out and menace shoppers.
- It fails to reclaim the existing public space and on-street parking unlawfully taken by the MTA, the Fire Department (park adjacent to the fire house), the Police Department (Mott and Cornaga Avenues, Scott A. Gadell Place), and the Post Office (Beach 18th Street).
- It fails to provide any explanation as to why one should suppose that the construction of housing will revitalize the area.
- It fails to explain how any of the proposed actions will address any of the Goals, except the goal of building housing.
- It fails to explain how implementation of the proposals will provide any benefit at all to existing residents, The Village, or any part of The Rockaways.
- **In summary, the proposals fail and should not be adopted.**

Background of the Process

The City's proposals result from the request of Councilmember Donovan Richards for city action to revitalize "the Village" or "Town" as residents refer to the downtown Far Rockaway area. Councilman Richards secured a promise of \$91 million from Mayor de Blasio to improve the area. A committee was created to plan the project and that resulted in five Goals and five purported strategies for implementing these goals.

There can be no doubt of Councilman Richards' sincere desire to improve the area. At the same time, everyone who knows him knows of his desire to provide more and better housing for the citizenry. Both of these are, of course, admirable goals. But is not clear that this project can be satisfy both objectives.

But to start at the beginning, the author of this paper has been living in this area since 1950 and is a member of the Board of the Bayswater Civic Association. Neither he nor anyone he knows except Kevin Alexander, head of the Rockaway Development and Revitalization Corporation (RDRC), was on the initial committee. To date, none of the names of the committee members have been made public, nor have records of their meetings been made public.

After the project was well underway, there were three public sessions. There were no overall presentations, but visitors were left to wander around a room with tables from various agencies. The meetings were held in a large room not very conducive to discussion, with much noise and echoes. Most of the attention was devoted to proposals by the Department of Transportation to make automobile access to the area more difficult. There was some small mention of a bit of housing.

At the final meeting, it was mentioned that there would be a meeting in a few days to discuss the formal proposal to create an urban renewal area and build 3,000 apartments in the area. Virtually everyone, except the initiates, was shocked.

At the next meeting, there was virtually no support for the idea of building apartments. Instead, people discussed problems in The Village and what to do about them. And formal responses to the proposal were due on Rosh HaShaonah! This in an area with a substantial Jewish population.

The Community Board appointed a very controlled Ad Hoc Committee to review the proposed zoning proposals. The committee's only agenda was how to tweak the City's zoning proposals. There was no consideration of the overall plan, or if any housing should be built to "revitalize" the area. Public input was not permitted by the committee (although there were some comments). On the other hand, the City was allowed over an hour to present its plan.

The Ad Hoc Committee reported its findings to the Board's Land Use Committee where there was a similar to those of the Ad Hoc Committee. Again, the City presented its plan with no organized opposition permitted.

Finally, the Land Use Committee reported to a special meeting of the Community Board. At this meeting the City again made its presentation, taking considerably over an hour. The City's presentation had many pretty pictures and artist's conceptions and discussion of problems and goals, but there was no explanation of how the housing would aid in revitalization of the area, or even result in any improvement at all. The Bayswater Civic Association requested ten minutes to make a comprehensive presentation of why the Board should not accept the plan but was refused. Speakers were only allowed 60 seconds – merely time to introduce themselves and state if they were for or against the plan. There was no opportunity for opponents of the plan to explain why it would not yield the results desired in the Goals of the Roadmap for Action.

Summary of the Project Goals and Direction

Draft EIS Goals:

- **Goal 1:** Re-establish Downtown Far Rockaway as the commercial and transportation hub of the Rockaway peninsula;
- **Goal 2:** Reposition the area as a mixed-use district, including new mixed-income housing;
- **Goal 3:** Activate the public realm with new connections and public open space;
- **Goal 4:** Improve the quality of life for residents through access to community services, education and quality jobs; and
- **Goal 5:** Build the capacity of community organizations and support local businesses.

Roadmap for Action

The City developed a “Roadmap for Action” as a “comprehensive response” to the Working Group’s goals and recommendations.

The “Downtown Far Rockaway Roadmap for Action” includes the following five strategies, including:

- Identifying new opportunities for mixed-income housing;
- Improving transportation infrastructure and transforming public space;
- Strengthening existing commercial corridors, small businesses, and connections to jobs;
- Expanding upon community services and cultural assets; and
- Rezoning the downtown area to unlock development potential for commercial and residential uses.

The Proposed Actions would affect an approximately 22-block area of the Downtown Far Rockaway neighborhood of Queens

(My) Summary of the City’s proposals

- Sell the DOT parking lot. Move buses to the street.
- Create an urban renewal area.
- Build 1,700 apartments in the Shopping Center (urban renewal area) and 3,300 overall in Downtown (8,000 residents).
- Build 15 story buildings “in context with the neighborhood” where the tallest building is the RDRC 6 story building and place all of the Village in shadow.
- Permit construction in mapped streets.
- Create private streets.
- Less than 1 parking spot per apartment, even for market rate apartments.
 - a. New apartments are likely to create a demand for an additional 1,000 on street parking spaces.
- Widen sidewalks and narrow roadways.
- Fail to address parking requirements. Between 200-400 spaces are needed for government vehicles and employees alone. Additional spaces will be needed for residents of the new apartments, in addition to spaces provided in the buildings. Shoppers are unlikely to use underground parking because of safety concerns, and the need to move a car as one goes from store to store.

- **No plans** for improving local resident access to Downtown:
 - a. Improve traffic flow so that access to the Village is quicker than the Five Towns.
 - b. No low cost, readily accessible parking.
- **No plans** for improving transportation, such as:
 - a. Bringing the LIRR to Mott Avenue.
 - b. Implementing QueensRail™
 - c. Having all “A” trains come to Rockaway and all “C” trains go to Lefferts Boulevard.
 - d. Extending the Q 52 bus to Far Rockaway.
 - e. Restoring Beach Channel Drive to two lanes.
 - f. Restoring Rockaway Freeway to two lanes.
 - g. Improving Edgemere Ave./ Rockaway Blvd to two lanes.
 - h. Restoring Beach Channel Drive to two lanes.
 - i. Restoring Rockaway Freeway to two lanes.
 - j. Improving Edgemere Ave./ Rockaway Blvd to two lanes.

Specific Problems with the DEIS

Note that not every bullet of the DEIS is addressed here. Only those with significant issues are mentioned.

2. Background

History

The discussion recounts an almost linear population increase from 1898 to 1960 (mostly prior to the subway), then goes on to say that population growth was due to the subway. It continues, saying that the area's decline was due to Rockaway's loss of appeal as a summertime vacation spot. This totally ignores the deliberate destruction of vast areas of the Rockaways by the city under the aegis of Robert Moses. The city forced the conversion of summer homes to year round residences, then forced the landlords to accept a welfare population often with little background in city living and no support services. It ignores the fact that these areas quickly became rundown as a result of the city's activities and the city's response was slum clearance leaving miles and miles of the Rockaways as vacant land. Thus, there was no place for summertime vacationers to go. The Rockaways didn't "lose its appeal." The city deliberately took away its appeal. Just as it is doing with this project, now that things are looking up.

The DEIS criticizes "poor pedestrian circulation" and "little open space" but fails to explain how these alleged problems negatively affect the area today when they did not cause a problem decades ago. And it fails to even suggest reclaiming existing open space that has been stolen, such as a public park adjacent to the fire house. Indeed, the report says "decades of insufficient investment have resulted in underperforming retail corridors as well as a lack of housing options, community services, and amenities." Of course "underperforming retail corridors" is undefined, but we know what it means. And again, the area has never had "housing options" in the downtown area and it was successful without them. The EDC know perfectly well that the problem is not a lack of housing. There is housing aplenty in the Redfern projects and the apartment houses behind the police station and IS 53. And there are purchasers with money aplenty to spend in the Bayswater and Reeds Lane / West Lawrence areas. The problem with Far Rockaway is that there are no shoppers with money to spend who want to spend it in town.

Project Area / Rezoning Area / Proposed Downtown Far Rockaway Urban Renewal Area

The area selected for study has been carefully circumscribed to support rezoning but not address any of the actual needs of the Far Rockaway Village or greater Far Rockaway community. It is carefully designed to remove the one asset that can revitalize Far Rockaway and once again, turn it over to the city to address its insatiable housing needs. Rockaway has seen this before. Yes, the city does need places for people to live. The city does need low income housing projects. The city does need nursing homes. The city does need adult homes. But they do not all need to be in Rockaway. Rockaway has far more than its share.

3. Purpose and Need For The Proposed Actions

The DEIS report cites the five goals that EDC keeps returning to, but fails to explain in any way how these goals will benefit the Rockaways and even if the area would benefit from achieving these goals, how the proposed actions will achieve any of them (except, of course, building housing). These goals are:

- **Goal 1:** Re-establish Downtown Far Rockaway as the commercial and transportation hub of the Rockaway peninsula;
- **Goal 2:** Reposition the area as a mixed-use district, including new mixed-income housing;
- **Goal 3:** Activate the public realm with new connections and public open space;
- **Goal 4:** Improve the quality of life for residents through access to community services, education and quality jobs; and
- **Goal 5:** Build the capacity of community organizations and support local businesses.

Let's look at these goals one at a time.

- **Goal 1:** Re-establish Downtown Far Rockaway as the commercial and transportation hub of the Rockaway peninsula;

What in the project will affect Far Rockaway's status as a commercial hub? Nothing at all! And what will happen to change the transportation status? Will the LIRR be reconnected to the "A" train? Will the Q 52 bus be extended to town? Will Far Rockaway be reconnected to central and northern Queens with QueensRail™? Will it become easier to drive into Far Rockaway from Bayswater or Reeds Lane than it is to drive to the Five Towns?

- **Goal 2:** Reposition the area as a mixed-use district, including new mixed-income housing;

The area is currently a mixed use district with many of the uses that one would expect in a downtown village. Of course, it is not a housing venue and that is the one goal that this plan would achieve. However, it is unlikely to have mixed income housing. It is just not an area where people who can afford market rate housing are likely to want to live. And, when landlords are unable to rent the market rate apartments to middle income tenants, they will do what landlords do. They will rent to various subsidized tenants and the homeless. Rockaway has seen this over and over. On the other hand, if a substantial fraction of the apartments are rented to market rate tenants, the already serious parking problem will be exacerbated since such people typically have an average of 1.5 to 2 cars per apartment but plans call for only 0.85 parking spaces per apartment. And is there any reason to believe that the market rate people will be more likely to shop in Far Rockaway than the market rate residents of Bayswater and Reeds Lane?

- **Goal 3:** Activate the public realm with new connections and public open space;

This is city planner garbage speak. The city has spent a small fortune building and repeatedly rehabilitating the walkway between Beach 20th and Beach 21st Streets only for it to be repeatedly defaced, filled with garbage, and become a hangout for children who menace shoppers. Of course, if all of the stores were knocked down, everything would be connected, but that means nothing.

- **Goal 4:** Improve the quality of life for residents through access to community services, education and quality jobs; and

Again, more garbage speak. Of course we would like the quality of life to be improved, but the plan offers no real solutions to the matter. Will building 3,300 apartments to house 8,000 residents with no schools improve education? Will it create jobs? Well, of course any building will require a few people to sweep the floors and take out the garbage, but that is hardly a solution to the Rockaway unemployment problem. Will the project reduce the lines at the post office or improve service to the levels of Lawrence or Cedarhurst? Not at all.

- **Goal 5:** Build the capacity of community organizations and support local businesses.

Once again, how will the project build the capacity of community organizations? Nowhere in any of the reams of paper that EDC has consumed do they suggest how this will be accomplished. Nor do they even suggest how local business will be supported. They seem to believe that by introducing 8,000 additional residents they will provide captive customers but there is no reason to believe that line of thinking. Either these residents will have discretionary income and will behave like other area residents and shop in the Five Towns, or if they don't have discretionary income will make little difference in the Village stores.

The projects' "Downtown Far Rockaway Roadmap for Action" is the EDC's solution to the above Goals. The Roadmap includes:

- Identifying new opportunities for mixed-income housing;
- Improving transportation infrastructure and transforming public space;
- Strengthening existing commercial corridors, small businesses, and connections to jobs;
- Expanding upon community services and cultural assets; and
- Rezoning the downtown area to unlock development potential for commercial and residential uses.

The Roadmap, like the Goals, is designed for one thing. To justify the construction of housing at the expense of Far Rockaway. It would do nothing to improve or revitalize the Village. Again, let's look at it point by point:

- Identifying new opportunities for mixed-income housing;

Well, yes. It certainly does do this.

- Improving transportation infrastructure and transforming public space;

There is no suggestion in the plan that it will improve transportation, either infrastructure or operational. Certainly there will be no changes to mass transit. Automobile access will be impeded by a reduction in parking, narrowing or elimination of traffic lanes, and addition of traffic control devices to further slow traffic.

- Strengthening existing commercial corridors, small businesses, and connections to jobs;

What commercial corridors will be strengthened? How will this be accomplished? What will be done that benefits small business? How will connections to jobs be improved? What are these jobs? Working for the DOE Fund cleaning the streets?

- Expanding upon community services and cultural assets; and

Again, what community services will be expanded? Why do they need to be expanded? What cultural assets exist or will be created? One of the significant community services in the area is St. John's Hospital, and plans are to impede access to it!

- Rezoning the downtown area to unlock development potential for commercial and residential uses.

Well, rezoning is certainly necessary to build 3,300 apartments, but there is no reason to believe that will improve Far Rockaway in any way. Certainly neither the DEIS nor any other document produced by EDC for this project even suggests that there will be any improvements to the Village as a result of the rezoning.

This section concludes “the Proposed Actions would more closely align off-street parking requirements with area demand and promote a walkable and vibrant streetscape.” Certainly I have yet to find anyone familiar with the project who supposes that shoppers will use underground parking, much less pay for it. Why the “streetscape” will be more walkable with this project is completely unexplained, as is what will make it “more vibrant.”

Description of the Proposed Actions

The discussion of zoning changes is the fundamental mistake of this plan. There should be no zoning changes to allow housing where it is not now permitted, or to increase the density of housing where it is now permitted. Every area of the Rockaways has fought for over a decade to reduce permitted housing density. Now is not the time to reverse this trend. People moved to the Rockaways because they found a suburban area within the City of New York. Making Rockaway like Brooklyn or the Bronx is not what residents want.

Disposition of Real Property

Once again, the sale of city owned property for housing is not what residents want or Far Rockaway needs. The sale of the DOT parking lot in particular and moving buses onto the street (and the concomitant reduction in parking) will further reduce the chances of revitalizing the area.

Designation and Adoption of the Downtown Far Rockaway Urban Renewal Area and Plan and Disposition

The one area of possible agreement is the designation of an urban renewal area. However, the proposed area is entirely inappropriate. The shopping center parking lot should be taken over by the city, either by negotiation or eminent domain. It should, however remain as a parking lot.

The shopping center had been a problem under the ownership of Rita Stark, but current management by her estate is rehabilitating it and it is likely to be an asset to the area. The discussion of blight and insanitary structures is just so much nonsense. If there are any such structures, then the Buildings and Health Departments must be condemned forthwith for not correcting those conditions using their existing authority. The discussion is more Robert Moses speak for my way or the highway. The only honest portion of the discussion (though mistaken for the area as a whole) is the talk of adding to the tax base. Certainly an apartment building will pay more taxes than a parking lot (unless granted huge tax abatements). But the point of the project is revitalization of Far Rockaway as a whole, not increasing real estate taxes on a postage stamp portion of the area.

5. Analysis Framework

Reasonable Worst Case Development Scenario (RWCDS)

The worst case scenario is the rezoning will proceed. In this event, Far Rockaway will be forever condemned to be a backwater shopping street but not the vibrant Village that it was and can be. Anyone with money to spend will continue to shop in the Five Towns or on Rockaway Turnpike. Indeed, when this was discussed with the EDC personnel, they admitted that they had not even visited those areas to understand the competition!

Planning Principles

The proposed development is fundamentally evil and anti-social. It proposes private streets, essentially not subject to the usual government regulations from which the public may be excluded at will. This is the case with the Arverne by the Sea development with its network of private streets, and has been the case even in Manhattan developments where regular news stories report that the public is excluded from public spaces builders constructed in exchange for construction bonuses. See “A ‘Members Only’ Public Space in Manhattan? Join the Club” in the New York Times, April 20, 2017, page A19, <https://nyti.ms/2pBcRuJ>.

The proposed new street linking the subway to the LIRR (what does Redfern Avenue do?) also exemplifies one of the reasons too many people have abandoned the Village. Security. That is the reason that the back exit / entrance to the shopping center was closed years ago. That is the reason that the police refuse to park in the DOT lot. So the misguided EDC city planners propose a street that zigs and zags, with no direct sight lines. Certainly people will avoid it because they won't be able to see if someone is lurking down the block. But city planners think that this is great!

And they propose to link this new street to Mott Avenue with a traffic circle. Now traffic circles can look very nice, but they are very anti-pedestrian. Just visit Carmel Indiana. It is a city of traffic circles. Great for cars since there are no lights. But it is impossible for pedestrians to cross the streets unless they go to one of the few lights in town.

They propose fifteen (15) story buildings “in context with the neighborhood” where the highest building is now six stories and most are even lower. Perhaps the Empire State Building would be even more “in context with the neighborhood” since I am not an expert in such things.

Buildings along Redfern Avenue would be four stories high, in context with the two story one and two story homes along the street. After all, four stories is only twice two stories. Isn't that a similar context?

The DEIS talks about promoting a “Main Street’ feeling’ on Mott Avenue. Of course, Beach 20th Street has been the historic main street of town with Mott and Cornaga Avenues as secondary, but important streets. But the project is imbued with city planner feelings and little competence or explanation or justification other than city planner classes. But then again, these are the same people who want to close down Queens Boulevard and Woodhaven Boulevard. And I heard that there is a proposal to permit parking on the Grand Central Parkway to reduce speeds.

6. Probable Impacts of the Proposed Actions

The DEIS analysis deliberately chooses to examine a tiny area and ignore the impact of their proposal on the entire Village and its surrounding residential areas.

The project undoubtedly violates federal law in several regards.

- It will probably accentuate racial segregation in the area.
- It will certainly increase air pollution to the significant traffic problems that it will create.
- It fails to address significant and dangerous air pollution from the Inwood Material Terminal at 1 Sheridan Boulevard.

The fact that few residents in the urban renewal area would be displaced is not a relevant measure of the effect of this project on the overall Far Rockaway residential population. It would affect everyone living in Bayswater and Reeds Lane / West Lawrence even though they would not be displaced – or at least their housing would not be altered. Their Village would most certainly be adversely affected.

The plan proposes to displace fully fifty percent of the banks that have remained in Far Rockaway through thick and thin (Capital One). And the home to the largest number of safety deposit boxes in the area. If those customers are forced to close their boxes, how likely are they to return to a new bank when it is build years later? And the removal of the vault may require high explosives that might damage the fire house and the new library as well as endanger subway passengers. I recall the constriction of the vault as a massive concrete and steel box within the bank.

Of course, the largest supermarket in the Village hardly matters since a new one will be build several years from now. And the fact that the new one will also be considerably smaller than

what is considered to be an optimal supermarket size hardly matters. Nor does the walking distance to the alternatives for the many residents of the Redfern houses without cars.

Indirect Residential Displacement

This section discussed the impact of new housing on tenants, but fails to consider the impact on owners of two family homes in the Bayswater and Reeds Lane / West Lawrence areas. While it may be a worthy goal for tenants to keep rents down, it is incumbent on the city to consider the effect on the small homeowners. Will the city's attempts to limit rents result in bankruptcies of homeowners or abandonment of some properties?

Adverse Effects on Specific Industries

The DEIS claims that more employment is needed, yet it admits that 283 jobs will be eliminated.

Community Facilities

The report concludes that the addition of 8,000 people in 3,300 apartments will not create a need for additional school seats. One must suppose that these will be childless families, or they will attend nearby private or parochial schools if the conclusions are to be accepted.

Open Space

The proposal admits that it would significantly adversely affect open space and that it would put most of the Village into shadow. No matter.

Urban Design and Visual Resources

The Proposed Actions would allow for new residential and commercial developments at a greater density than what is currently permitted as-of-right in the Project Area and would represent a notable change in the urban design character of the Project Area and Primary Study Area.

The report then goes on to conclude that this would be a good thing since it would permit the desired construction. Heads I win, tails you lose!

Transportation

Traffic

The DEIS concludes that there would be significant adverse impacts at 20 intersections (virtually all of the intersections in the area). It says that these problems will be mitigated through standard traffic engineering improvements but fails to explain why DOT has been unable to improve existing terrible conditions through standard traffic control improvements.

Further, plans are to make existing lanes narrower and eliminate some lanes altogether. This will no doubt make conditions even worse.

Transit

The proposal concludes that transit would be significantly adversely affected despite the fact that transit improvement is one of its goals!

Pedestrians

Once again the report concludes that pedestrians would be adversely affected. It suggests tinkering with the timing of traffic signals, but once again offers little evidence that this remedy would be effective. Further, it ignores the effect on traffic of an additional 8,000 people jay walking.

Parking

This analysis is fatally flawed. It assumes that shoppers would be willing to park underground and pay substantial amounts for the privilege. Neither one of these assumptions is likely to prove to be true. This will be just another reason to go to the Five Towns or Rockaway Turnpike to shop. And it ignores the parking requirements of the new market rate tenants who are likely to have twice as many or more cars as the proposed parking requirements assume.

Neighborhood Character

The Downtown Far Rockaway neighborhood can be characterized as a ‘village,’ as the neighborhood has provided the local community with commercial and institutional services typical of a village center. However, as the neighborhood has grown and changed, the services provided have become inadequate to meet the local need.

Certainly local residents would agree that the downtown area is a village. Our village. But the second sentence makes no sense at all. On one hand, the DEIS argues that the Village has shrunk, rather than grown. And while services may be inadequate, the proposal fails to state how they are inadequate or what the plan will do to address these inadequacies. Two examples may suffice.

Why is it that anyone with a car goes to Lawrence for postal services? Could it be that the Lawrence post office is so much larger (it is significantly smaller)? How will the plan address this?

Why is it that so many of the customers at the Chase branch in Lawrence are from Far Rockaway? Again, how will the plan address this?

7. Mitigation

There is no reason to believe that any of the mitigation measures would be effective. Most address existing problems which the various responsible agencies have been unable or unwilling to resolve to date and there is unreasonable to suppose that they will suddenly become effective.

Further, the demolition of the Jamaica Savings Bank building (now Capitol One) vault is likely to result in significant damage to area buildings including the historic Trinity Church and the landmarked post office. And it could cause trains to leave the tracks on the subway.

9. Unavoidable Adverse Impacts

The proposal discusses child care, but fails to address school seats as previously discussed.

Open space was also discussed previously discussed.

The total and utter failure to address and resolve the areas transportation issues is the most serious aspect of the proposal and should be reason enough for its rejection. Indeed, these are the Village's most fundamental problems, and permitting this rezoning will only make all of the problems far worse.

12. New York State Environmental Conservation Law

This section of the report discusses the Baychester Square project. It is unclear what its relationship is to Far Rockaway.

13. Contact Office

Attempts to contact personnel in the "Contact Office" have been unsuccessful.

Effect of the City's Proposals

If the City's proposals are implemented, either as proposed or with the modifications proposed by the Community Board, the following are the likely results:

- Far Rockaway will be converted into a model of Brooklyn, an area that people came here to escape.
- Downtown traffic will become far worse than it is now, which is often described as impossible,
- Air pollution will increase due to significantly worse traffic congestion.
- Police and fire response times will increase dramatically.
- Nassau County police and Hatzolah emergency medical services are likely to divert ambulances from St. John's Hospital, a major employer in town, to Mercy and South Nassau Hospitals because of significantly increased response times.
- The few trips made into Town by Bayswater and Reeds Lane / West Lawrence residents will be reduced even further.
- Racial segregation in the downtown Far Rockaway area will be significantly exacerbated.

An alternative proposal

Lighting

Street lighting in the area should be dramatically improved. The Five Towns downtown areas have increased street lighting levels in their shopping areas while the city has recently decreased lighting levels in the Village. Lighting is an important part of people's feelings of security. Again, illumination levels must at least meet the levels of the competition.

Street lighting levels should be at least twice the levels prior to the conversion from high pressure sodium lamps to LEDs. The conversion resulted in a significant decrease in lighting levels.

Security

Also, an important reason why Far Rockaway was abandoned was security. There was a time when any trip to the Village was a dangerous adventure. That situation has now been reversed. Indeed, the NYPD is a demonstrably more competent police organization than the Nassau County police department but the city must undertake to convince local residents of that fact. It may be unpleasant, but the NYC government should undertake direct comparisons. How many holdups does it take before each department apprehends the perpetrator? How many muggings before the criminal is brought to justice?

Public Space

Reopen the park adjacent to the fire house for the public's use.

Close the walkway between Beach 20th and Beach 21st Streets and constrict stores facing both streets.

Mass Transit

The City's proposal talks of Far Rockaway as a "transit hub" but does nothing to reestablish it as the hub that it once was. In fact, by reducing available all day parking for commuters from the Five Towns and Atlantic Beach, it will be less of a hub. And more drivers will use automobiles.

The following proposals would improve mass transit for all:

- Provide all day commuter parking.
- Have all "A" trains terminate in the Rockaways and all "C" trains terminate at Lefferts Boulevard.
- Implement QueensRail™.
- Maintain a central, off street, bus terminal / layover facility.
- Provide space in the bus facility for "Dollar Vans."
- Extend the Q 52 route to Mott Avenue.
- Extend the LIRR from its terminus on Nameoke Avenue to its former location at Mott Avenue.

Parking

There are a number of steps that would alleviate the Village's parking problems:

- Pave Morse Court and build a parking facility for police vehicles, impounded vehicles, police employee cars, and Fire Department employee cars in the vacant area at end of Morse Court.
- Consider making space in the Morse Court facility available to the post office for both official vehicles and employees.
- Impose command discipline on NYPD and FDNY employees who continue parking on the street.
- Maintain the existing public parking lot between Beach 21st and Beach 22nd Streets.
- Take over the shopping center parking lot owned by the Rita Stark Estate (but not the stores) and run it as a DOT facility.
- Provide a three hour parking limit in the Village.
- Limit parking fees to the cost of operating the system, certainly no more than \$.25 per hour. Consider the English system of requiring motorists to put a sign in the window stating when they parked and when the time has expired instead of using meters to time parking periods.
- Relocate the taxi office at the Beach 22nd Street entrance to the DOT parking lot so that it has a view of the parking lot. This would enhance safety and encourage use of the lot.
- Arrange to have the Sanitation Department regularly sweep the DOT lot.

Road Conditions

The downtown area, as a concentrated business area has always had and is likely to continue to have traffic problems, but there are several actions that the City can take to make them more bearable:

- Modify the entrance and exit to the shopping center parking lot so that the entrance is a continuation of Beach 21st Street and the exit faces Beach 22nd Street.
- Take some space from the DOT parking lot to allow vehicles to more easily pass vehicles picking up and discharging passengers at the subway.
- Remove "Dollar Vans" from the streets when they are not actually picking up or discharging passengers. If they fail to comply, issue summonses for parking, driving so slowly as to block traffic, engine idling, disobeying an officer when told to move on, etc.
- Remove the bus stop adjacent to McDonald's so that busses do not block the Beach Channel Drive / Mott Avenue intersection.
- At the Beach Channel Drive / Mott Avenue intersection:
 - Create a right turn lane for southbound traffic on Beach Channel Drive turning into Bayswater.
 - Create a right turn lane for northbound Beach Channel Drive turning into the Village.
 - Bring the intersection into MUTCD compliance by providing overhead turn lane signs.
 - Maintain pavement makings on a regular basis.

- Adjust the yellow interval to account for the width of Beach Channel Drive as required by the MUTCD.
- At the Beach Channel Drive / Freeway / Regina Avenue intersection:
 - Install directional signs on Beach Channel Drive southbound (Beach Channel Drive / Freeway) so that they are visible to vehicles before reaching the traffic light.
 - Install signal heads on the Freeway supports so that they are visible to vehicles stopped at the light.
- Modify the traffic signals on Mott Avenue so that vehicles don't stop at every intersection.
- Consider modifying Smith Street so that it is a continuation of Beach 19th Street by having it pass to the east of the Chase Bank building.
- Widen Beach Channel Drive to two lanes in each direction by removing the bike lanes.
- Consider permitting right turns on red in the Rockaways as is done in adjacent Nassau County.
- Traffic signals throughout the area, but on Beach Channel Drive in particular should be timed so that a motorist traveling at the legal speed limit normally does not have to stop. They definitely should not be timed, as they are now, so that when there is little traffic, a vehicle traveling in excess of 60 mph can make all the lights. Traffic light timing must comply with applicable federal and state law. It may not be used for speed control, but it ought not to encourage speeding. The *Vehicle and Traffic Law* states that its purpose is to provide for the maximum safe use of the streets. That should be the goal.

Housing

Housing should not be a part of any plan to revitalize the downtown Far Rockaway Village.

Other Actions

A considerable number of Bayswater and Reeds Lane / West Lawrence residents could be drawn to the area by making public services more attractive to them. These include:

- There should be short term, free parking in front of the police station.
- The City's Law Department should be engaged to remedy the service at the post office. The U.S.P.S. is engaged in a clear policy of racial discrimination in terms of levels of service, including waiting times, treatment of customers, lighting (it's the dingiest postal facility in the area), as well as mail delivery. If the City forced the Postal Service to upgrade conditions, people would more likely use Far Rockaway instead of Lawrence, bringing potential shoppers to the area.
- The Fire Department should have fire marshals make regular inspections of the stores. Stores that block fire exits, such as Food Dynasty, should be shut down on the spot as is done in Nassau County. Effective fire code enforcement would make local stores more like their Five Towns brethren, and more inviting for residents who have shopping options.
- Ask Jamie Dimon, Chase CEO to improve conditions at the Far Rockaway branch so that Rockaway residents would not use Five Towns branches. If he refuses a meeting with

the city, raise the issue at the Annual Meeting. Note this is probably not a matter that can be resolved permanently at a lower level.

A final consideration to the City's plans should be the overall future of retail in general. An article, "Is American Retail at a Historic Tipping Point?" in the *New York Times* on April 15, 2017 (<https://nyti.ms/2odz8xo>) suggests that there will be dramatically fewer retail stores and jobs in the future as more people purchase on-line. "There is a rolling crisis that has emerged in the last couple of years as store closings are being announced," Mr. Cohen said. "People are losing their jobs and have no other place to go." The City should not be preparing for a retail world that is disappearing. It should be making the existing Village more workable and shopper friendly.

Conclusion

Revitalization of the Far Rockaway downtown area should be an important NYC government goal but it can **not** be accomplished by the City's proposals.

There should be no rezoning, at least until the suggestions in the alternate plan have been implemented and evaluated.