

**Long Island City Coalition**  
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July 12, 2020

Dear Your LIC,

Thank you for your community outreach events and for bringing together four real estate developers to propose a comprehensive plan for Anable Basin. In your presentations, you've acknowledged many of the goals LIC Coalition has been advocating for years—namely, more open space, resilient design, affordability, community services, infrastructure improvements, and job growth. LIC Coalition also shares your presumed goal of bringing together our various neighborhoods—Queensbridge, Court Square, Hunters Point, and Hunters Point South—within a built environment that is equitable, sustainable, and just.

Unfortunately, the top-down (faux community-driven) plans outlined in your well-orchestrated events will fully *undermine* these objectives—beginning with the elimination of parkland setbacks needed as a “sponge” against anticipated flooding. As you know, the 28-acre development parcel comprising the Anable Basin project is in the *highest risk flood category* and currently experiences “sunny day flooding” during high tide. You may also be aware that New York City *tops the list* of fifteen U.S. cities expected to experience severe financial loss due to storm surge activity associated with hurricanes. And compounding the problem, the NYC Panel on Climate Change conservatively predicts a 2'-6' rise in sea-level by 2050. Situating a battery of luxury (60- to 70-story) residential and commercial mega towers at the water's edge and along this *lowest* point of the floodplain exponentially increases the human cost of the projected flooding (*including to vulnerable inland areas behind it*) and disregards financial costs expected to be in the tens of billions of dollars. Who takes on this risk—FEMA? The insurance companies?

Mega towers will also exacerbate these pressing problems:

- **Open Space** – LIC has one of the *lowest levels of per capita open space* in the city, and Your LIC's plans *will increase that deficit*.
- **Infrastructure** – LIC's neglected sewer system, which is crumbling beneath the area's overdevelopment, frequently allows CSOs to be discharged into the East River and Newtown Creek and into our streets and basements. Your proposal, which neither

takes into account the area’s unique high-water table nor reveals what level of storm activity can be accommodated in the collection system, is simply not credible and will further tax the existing infrastructure.

- **School Seats** – Every new residential building in LIC has *exacerbated* the school seat deficit. In the context of 26,000 new residents, your plan for new schools falls short and will merely compound the problem.
- **Affordability** – So-called “affordable” units, which use AMI formulas bearing no relation to real median incomes, are *out of reach* to low- and moderate-income families that need *deeply* affordable space. In addition, new luxury towers will inflate area rents and *further displace* many long-time residents, artists, and small businesses that have called LIC home for years.
- **Jobs** – You provide no specifics, and recent experience in Court Square suggests that the “mixed-use” rezoning you are lobbying for will neither create affordable commercial space *nor a meaningful number of new jobs*. As noted, the plan will *displace* current businesses and *eliminate* current jobs. And the programs you are touting—“workforce development,” “job training,” “internships,” and “after-school programs”—simply mimic local community proposals. There is *no need to tether them to luxury development*.

*Architectural Digest*, a publication that chronicles the lifestyles of the “one percent,” recently recognized the need to address inequities that are “baked into our buildings, neighborhoods, towns, and cities.”<sup>1</sup> This moment of reckoning and of Black Lives Matter, says writer Meaghan O’Neill, “is the time to have...hard conversations and to reframe how we build and unbuild communities and spaces.” She quotes designer Bryan C. Lee Jr. on the need to “[invest] in *affordable communities* [our italics], not just affordable housing.” Yet rather than facilitating those “hard conversations” and working to undo the disparities that attend segregated housing and services, Your LIC’s proposals further “bake” them in.

What is *not* needed at Anable Basin are new luxury towers on **public** land appropriated for private profit. What *is* needed? An extension of Gantry Park to the north, to provide real open

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<sup>1</sup> Meaghan O’Neill, “Why Justice in Design is Critical to Repairing America,” *Architectural Digest*, 07/02/20.

space and a buffer against anticipated flooding; subsidized, *low-rise* retail, light manufacturing, artisan, and performing arts spaces, properly set back from the water's edge; two schools (necessary for *existing* residents), utilizing the publically-owned DOE or DOT building; and community space in those public properties for skills training, job development, and a STEAM program that partners with arts organizations and Cornell Tech.

Not least, whatever spaces and programs are developed for the site must positively impact the lives of Queensbridge residents. That includes using federal, state, and city funds not to subsidize well-heeled developers and underwrite luxury housing (*through massive bailouts, tax incentives, and abatements that will extend for decades, depriving the city of needed funds for infrastructure, public housing, public parks, etc.*), but to bring Queensbridge (and other nearby public housing that has suffered from years of deficient maintenance) fully up to code. These priorities, long neglected amid the area's hyper-expansion, have been explicitly called for by a cross-section of local groups at events that were community-organized and community-led. Your LIC's events, while keeping up a veneer of community input, have effectively drowned it out—deflecting, dismissing, misrepresenting, and plain ignoring the community's stated needs.

We fully agree, incidentally, that density is often a very good thing (we are, after all, New Yorkers). But the attempt to plant density—and luxury density at that—at the lowest point of the floodplain, amid shrinking open space, crumbling infrastructure, and a deficit of services is a crime. The plans even defy market logic, given that LIC has a glut of unsold luxury units<sup>2</sup> and that “virtual offices” may reduce the demand for high-end commercial space.

We further understand the need for deeply affordable housing in our community—*outside* of the Anable Basin floodplain and predicated on the *prior* installation of infrastructure and services. However, as reported by the NYC Comptroller's office, the current framework for adding these units—as a small portion of luxury development and tied to outmoded AMI formulas—is “not mov[ing] the needle.”<sup>3</sup> Rather, the focus on luxury and ever-increasing rents has helped to drive homelessness. “Without a wholesale change in our approach”—one that commits to deeply and permanently affordable, well-maintained units, New York will no longer be a place “where all...residents can thrive.”

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<sup>2</sup> As Stefanos Chen of *The New York Times* recently reported, "In Long Island City, out of 1,945 condo units completed since 2018, nearly 60 percent remain unsold." <https://www.nytimes.com/2020/07/03/realestate/long-island-city-greenpoint-new-development.html>

<sup>3</sup> “NYC For All: The Housing We Need—A Plan for Affordable Housing for New York City's Working Families.” New York City Comptroller's Office. November 2018.

The Anable Basin project is, nonetheless, about Your LIC's bottom line—so let us not pretend that it is about the needs of the community, or the city, or anything else. And to position it as a contest between *no* development and luxury development is to present a false choice, one that ignores development alternatives—*such as forming a Community Land Trust*—by which this jewel of a parcel might holistically meet the community's and the city's most pressing needs. The greatest affront, however, is that you've wrapped your marketing in the imagery of Black Lives Matter—a movement we support unreservedly—and in the language of Martin Luther King—who advocated not only for civil rights but for massive public investment in neighborhoods. You've thus subverted aspirations of equality, sustainability, and justice and turned them into corporate speak. “Now is the time,” said MLK, grounding the critical present in the legacy of our past and in the promise of our future. Now is the time to have hard conversations about how we can build equitable and sustainable urban communities.

Sincerely,

Justice for All Coalition

Western Queens Community Land Trust

Small Town Confidential

Long Island City Coalition