

Amanda Burden
Chairperson
New York City Department of City Planning
22 Reade Street
New York, NY 10006



May 23, 2007

Re: The Jamaica Plan

Dear Chair Burden:

The New York Metro Chapter of the American Planning Association represents more than 1,250 planners, designers, engineers and other professionals involved in planning for the region's communities. Our members work in the private sector, in nonprofit organizations and in government agencies to address planning issues affecting the physical, social and economic environment of the metropolitan region (New York City, Long Island and the Hudson Valley). We are part of the American Planning Association whose 46,000 members are dedicated to creating livable communities of lasting value.

The NY Metro APA Chapter is particularly committed to promoting planning-related public education, encouraging broad participation in planning decisions, and collaborating with other organizations to advocate the highest standards of the planning profession.

The Jamaica Plan

The APA commends the Department of City Planning on a rezoning that will positively shape 368 blocks of the Jamaica area for years to come. The Jamaica Plan should create new economic growth and housing through mixed-use, transit-oriented development in Downtown Jamaica; new development on underutilized blocks in the area adjacent to the Jamaica Long Island Rail Road and AirTrain stations; preserve the scale and density of existing neighborhoods; and protect industrial uses.

Given the ongoing need for affordable housing and the possible socioeconomic changes in the Jamaica area, the APA supports using a floor area bonus for provision of permanently affordable housing through the Inclusionary Housing Program.

With the Jamaica Plan, City Planning is staying ahead of the development curve and putting its imprint on an area where growth is expected to be



accommodated in years to come. To maximize the effectiveness of this rezoning plan, the APA wishes to offer a number of recommendations for critical followup by the Department or the City. These recommendations are largely related to appropriate densities, infrastructure upgrades, and interagency coordination:

Manufacturing Districts

- The proposed action is expected to result in a net decrease of 500,000 square feet of industrial space. While the DEIS states that the changes are expected to occur in areas where manufacturing uses are in decline, the APA encourages active protection of industrial uses in the manufacturing districts which are to remain, as well as relocation of displaced businesses. Such protection could be facilitated through coordination with the Industrial Development Agency and other appropriate organizations and we would like to see this work begin.

Contextual Residential Districts

The APA supports the Jamaica Plan's downzoning to R3A., R3X and R4-1 districts in areas where one- and two-family homes predominate. APA also commends the introduction of a "transition rule" for providing a buffer where R6 or higher districts abut R5 or lower districts. This is an innovative tool that could be useful in other parts of the city.

- Given community concerns over the increase in density along Hillside Avenue, we urge City Planning to consider further measures, such as a greater buffer, to address concerns about new density.

Accommodation of High-Density Development

The expected net increase of approximately 3,400 housing units and potential increase of 3,000,000 square feet of commercial space will help to accommodate a portion of the tremendous growth that is expected in the coming years. Downtown Jamaica's convenience to the Long Island Railroad, the Airtrain and multiple subway lines makes it particularly suitable for such growth and we support the upzoning to C6-2, C6-3, and C6-4 districts. Additionally, the creation of the Special Downtown Jamaica District (SDJD) with controls pertaining to glazing, streetwalls, retail frontage and other streetscape elements should result in an attractive healthy, viable Downtown Jamaica with a strong mix of uses.

Given the tremendous amount of growth that is facilitated by ambitious rezoning proposals such as the Jamaica Plan, we believe it is incumbent on the



Department of City Planning, along with the City, to take a more active role in planning for infrastructure and public amenities necessary to comfortably and sustainably accommodate such growth. This may involve working closely with the Mayor's Office on implementation of PlaNYC and greater interagency coordination.

With respect to the expected growth in Jamaica, we recommend further review and greater participation by City Planning in the following areas:

Open Space

- The proposed rezoning is expected to reduce passive open space ratios by 8.6% in the non-residential study area and by 6.5% in the residential study area. APA urges further open space creation in additional areas more convenient to the expected increases in density. Well-planned open space for lunch areas, respite places and sunshine are crucial elements in a high-density area.
- We urge City Planning to consider additional areas for public open space, including existing City land or acquisition of vacant or blighted land for open space use. One possible tool to assist in the creation and improvement of open space would be a District Improvement Bonus, such as that currently being utilized in the Hudson Yards District and Greenpoint-Williamsburg. The APA also encourages interagency coordination with the Department of Parks and Recreation to ensure the improvement of existing open spaces inside or adjacent to the area of the Jamaica Plan.

Sewer and Water

A number of communities in the vicinity of Jamaica have experienced water supply and sewer system problems in recent years. These issues in the area must be addressed and improved if the area is to accommodate additional development density.

- Although the Department of Environmental Protection may have actions planned in the study area which are to improve the water and sewer systems, the City must coordinate the anticipated new development with such improvements. A district improvement bonus or requirement for on-site infrastructure upgrades may help facilitate necessary improvements.



Energy

The DEIS states that Con Edison has identified a number of service upgrades to better serve the Jamaica community's existing needs and future growth.

- In areas where the existing energy infrastructure is overburdened, we would like to see City Planning consider policies which require that certain energy-intensive uses or commercial buildings of a certain size utilize alternative energy sources such as solar energy, on-site generators, or co-generation.

Traffic & Parking

- The APA urges close coordination between the Department of City Planning and the Department of Transportation to ensure that the anticipated signal and roadway improvements are followed through to completion and appropriately monitored for success.
- We also would prefer to see no minimum parking requirements within the Downtown Special District and closest to the transit hub. Additional parking in these areas uses valuable land that could be dedicated to active uses and increases the cost of development by requiring tenants to pay for parking they may not need due to alternative modes or existing excess capacity.

Transit

- We urge the City to engage MTA so that the agency is informed of all anticipated impacts and can plan accordingly. City Planning should make the MTA aware of all anticipated impacts so that the agency can plan accordingly.

Bicycle Network

- To further encourage the use of non-automobile transportation, APA encourages the implementation of bicycle routes as proposed in the City's Master Bicycle Plan and based on the identification of potential major biking corridors in relation to redevelopment areas, transit stations, and open space.
- To further support and encourage cycling, we urge City Planning to include requirements for on-street and off-street bicycle parking as part of the proposed Special Downtown Jamaica District.

Conclusion

The NY Metro Chapter of APA supports the City's Jamaica Plan. However, such an ambitious rezoning proposal creates growth which stresses overburdened infrastructure and may disrupt stable communities. Rather than relying on outside agencies or private parties to address emergent infrastructure problems, we urge the Department of City Planning to take a more active role in addressing these issues through zoning controls and inter-agency coordination. We also urge continuing coordination with the local community boards as ULURP proceeds.

