~~Draft~~ Final Scope of Work for Preparation of an Environmental Impact Statement 240 Nassau Street

A. INTRODUCTION

This document is the Final Scope of Work (FSOW) for the 240 Nassau Street Draft Environmental Impact Statement (DEIS). This FSOW has been prepared to describe the proposed project, present the proposed framework for the EIS analysis, and discuss the procedures to be followed in the preparation of the DEIS. This FSOW incorporates revisions of the Draft Scope of Work (DSOW) and are indicated by double-underlining new text and striking deleted text.

The co-applicants, the New York City Educational Construction Fund (ECF) and 240 Nassau Street Holdings, LLC, are seeking ~~a rezoning~~zoning approvals from the New York City Planning Commission (CPC) and New York City Council, and other City and State approvals and potential future U.S. Department of Housing and Urban Development (HUD) actions (the "proposed actions") to facilitate the construction of a proposed mixed-use development on Block 110, Lot 25 and Block 111, Lot 1 (the "project site") in Brooklyn Community District (CD) 2 (see **Figure 1**). ~~with residential, retail, community center, and cultural space, public school facilities and open space. The co-applicants propose 121,000 gross square feet (gsf) of public school space, up to 1,502 mixed-income residential units (approximately 1,502,000 gsf), 34,000 gsf of retail, and 45,000 gsf of community facility space. The project site consists of a 79,807-sf portion of the block bounded by Nassau Street to the north, Navy Street to the east, Concord Street to the south. To the west, the project site is bounded by the Brooklyn Queens Expressway (BQE) and Golconda Playground, a public park maintained by the New York City Department of Parks and Recreation (NYC Parks).~~

The proposed actions include the following ~~project requires discretionary zoning~~ land use approvals: a zoning map amendment to change the zoning on the project site from an R6 zoning district to a C6-12 zoning district; a zoning text amendment to map the rezoned project site as a Mandatory Inclusionary Housing (MIH) Area in Appendix F of the Zoning Resolution (ZR); a zoning text amendment to modify ZR Section 74-752 to make the provisions applicable to the project site and to allow modification of ZR Section 27-10 (Administration of Affordable Housing); and a special permit pursuant to ZR Section 74-752 to allow modification of certain bulk, loading, and affordable housing requirements.~~from the New York City Planning Commission (CPC). In addition to the zoning approvals, the proposed project requires the transfer, reallocation, and lease of property among the developer, ECF, and the City of New York to allow for the schools in the new location, the proposed development, and ECF financing. Additionally, ECF would issue tax exempt bonds to facilitate construction of the school.~~

The co-applicants propose a mixed-use development with four new buildings totaling approximately 1.7 million gross square feet (gsf), including approximately 1.5 million gsf of residential space (approximately 1,502 mixed-income dwelling units [DUs], of which approximately 302 DUs are expected to be affordable), 34,000 gsf of retail, 166,000 gsf of

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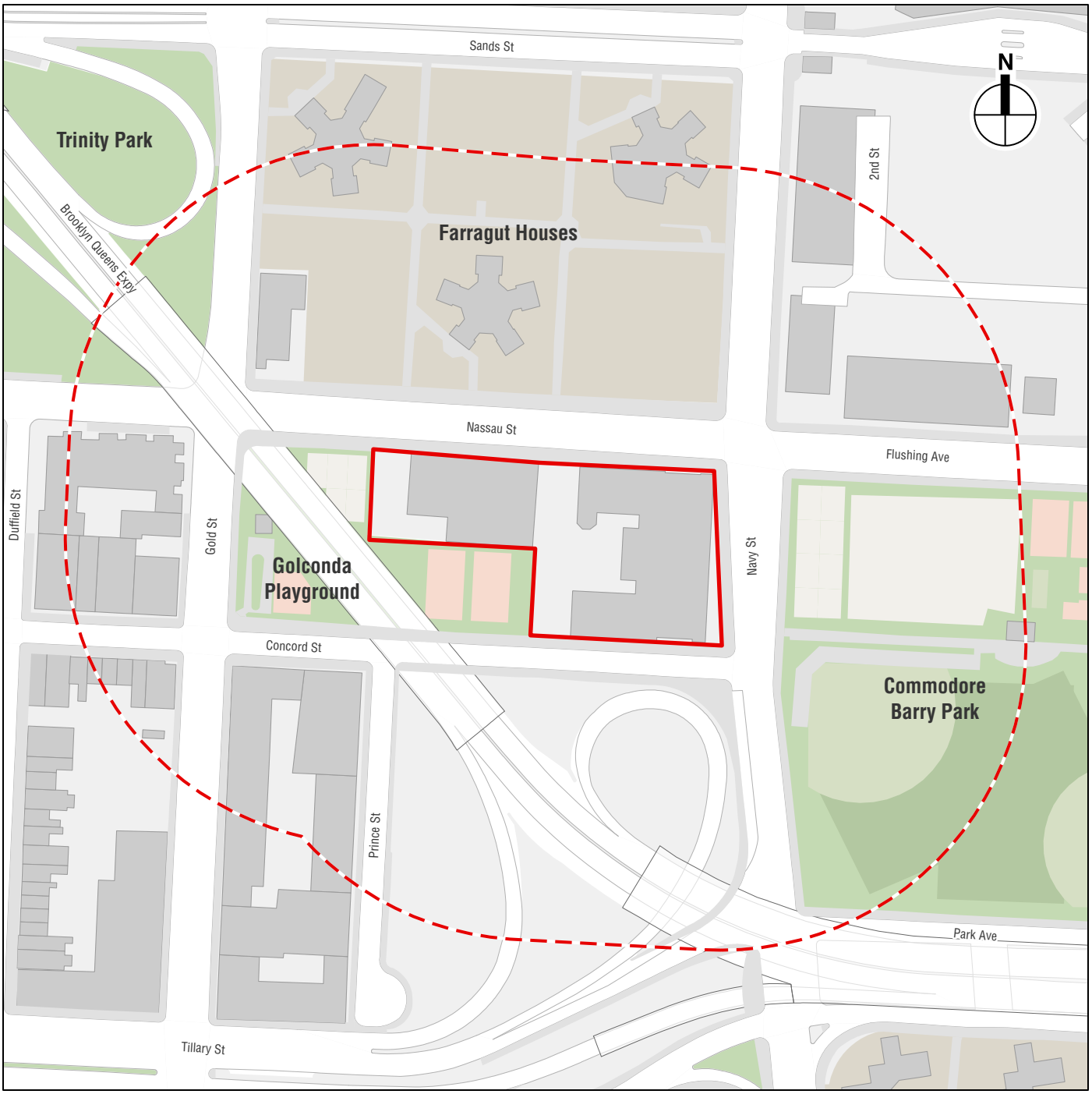

Project Site

Study Area (400-foot boundary)



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240 NASSAU STREET

Project Location

Figure 1

community facility space, inclusive of 121,000 gsf of public school space (approximately 931 seats), approximately 15,000 gsf of cultural center space, and 30,000 gsf of community facility space (the "proposed project").

The proposed project would occupy an approximately 80,000-square-foot (sf) portion of Blocks 110 and 111, bounded by Nassau Street to the north, Navy Street to the east, Concord Street to the south, and Golconda Playground, a public park maintained by the New York City Department of Parks and Recreation (NYC Parks) to the west. Elevated above a portion of Golconda Playground is the Brooklyn-Queens Expressway (BQE).

In addition to the above discretionary approvals subject to approval by the CPC and New York City Council, the proposed actions also include the transfer, reallocation, and lease of property among 240 Nassau Street Holdings, LLC, ECF, and the City of New York to allow for the proposed project and ECF financing. A determination from NYC Parks pursuant to ZR Section 23-381 is also being sought to permit light and air for the legally required windows at the abutting lot lines between Buildings 1 and 4 and the abutting lot lines of Golconda Playground. As described below, the proposed project could also require additional approvals.

The proposed project also requires relocation of Public School (P.S.) 287, also known as the Dr. Bailey K. Ashford school, by the Panel for Educational Policy (PEP). Additionally, the proposed project could potentially utilize the New York City Housing Authority's (NYCHA) Transfer of Assistance (TOA) program, which includes the allocation of Project Based Vouchers (PBV) to create new senior housing opportunities for existing NYCHA residents in the proposed project. TOA and PBV are part of HUD's Rental Assistance Demonstration (RAD) program.

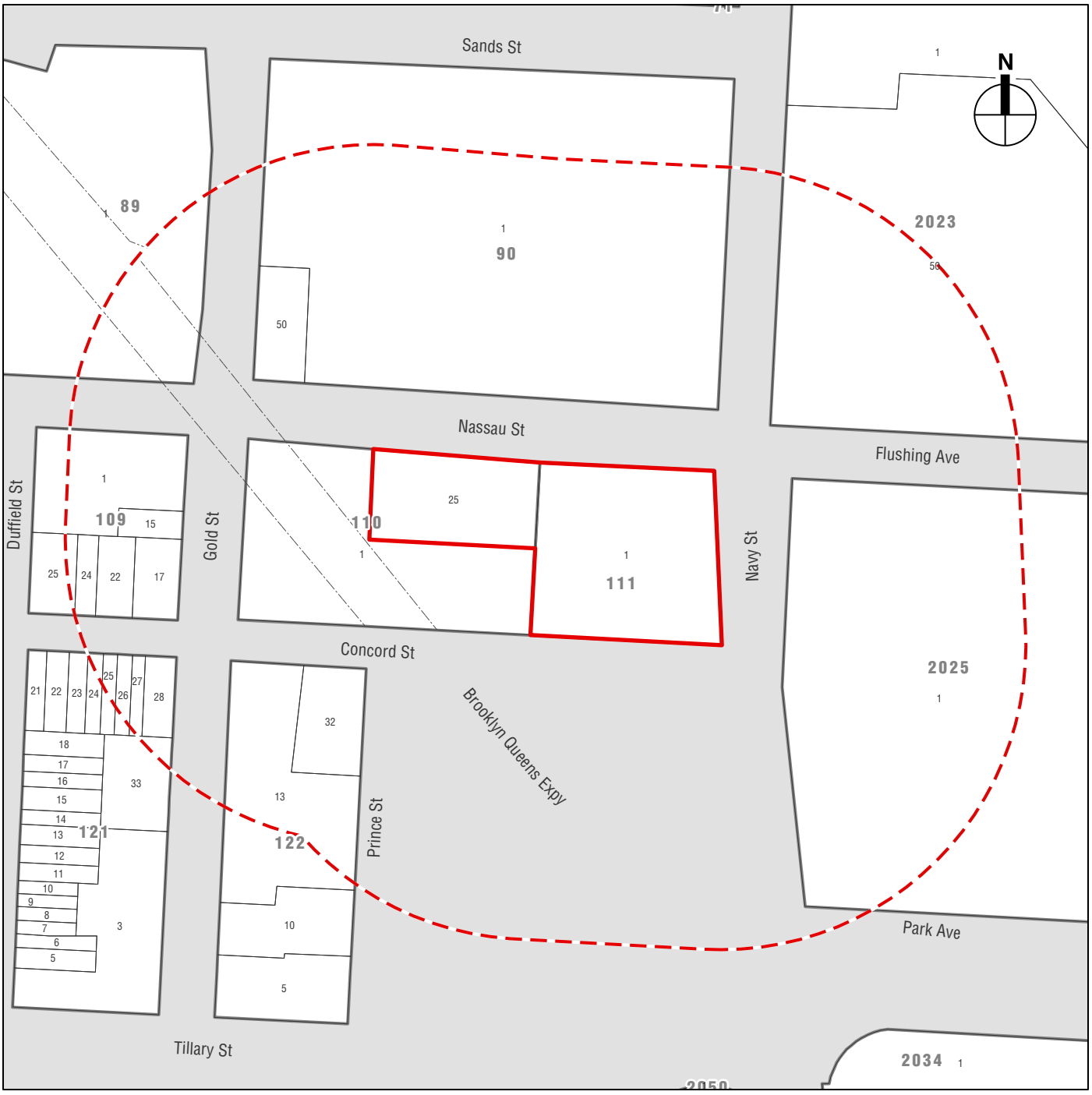
The proposed actions require review under City Environmental Quality Review (CEQR) and the State Environmental Quality Review Act (SEQRA). The environmental review provides a means for decision-makers and other government agencies to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify, and mitigate where practicable, any significant adverse environmental impacts. As a disclosure document, the Draft EIS (DEIS) will afford the public and community stakeholders the opportunity to meaningfully comment on the potential for significant adverse impacts. ECF will serve as the lead agency for the environmental review.

The scoping process is intended to focus the DEIS on those issues that are most pertinent to the proposed actions and allows involved and interested agencies and the public a voice in framing the scope of the DEIS. The proposed scope of work for each technical area to be analyzed in the DEIS follows. Analyses will be conducted for one ~~build~~ analysis year, 2033, by which time the full build-out associated with the proposed actions is expected to be complete.

B. PROJECT DESCRIPTION

PROJECT SITE

The project site is Block 110, Lot 25 and Block 111, Lot 1 in Downtown Brooklyn. As shown in **Figure 1**, the project site consists of ~~a~~ an approximately ~~79,807~~80,000-sf portion of the block bounded by Nassau Street to the north, Navy Street to the east, Concord Street to the south. To the west, the project is bounded by the BQE and Golconda Playground, a public park maintained by NYC Parks. The project site is currently zoned R6 (see **Figure 2**). The area surrounding the project site includes public facilities and institutions, transportation infrastructure associated with the



Project Site

Study Area (400-foot boundary)

Tax Lot Boundary

Tax Block Boundary

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240 NASSAU STREET

Tax Map

Figure 2

BQE, residential and mixed residential/commercial buildings, industrial and manufacturing buildings, parking facilities, and open space (see **Figures 3 and 4**).

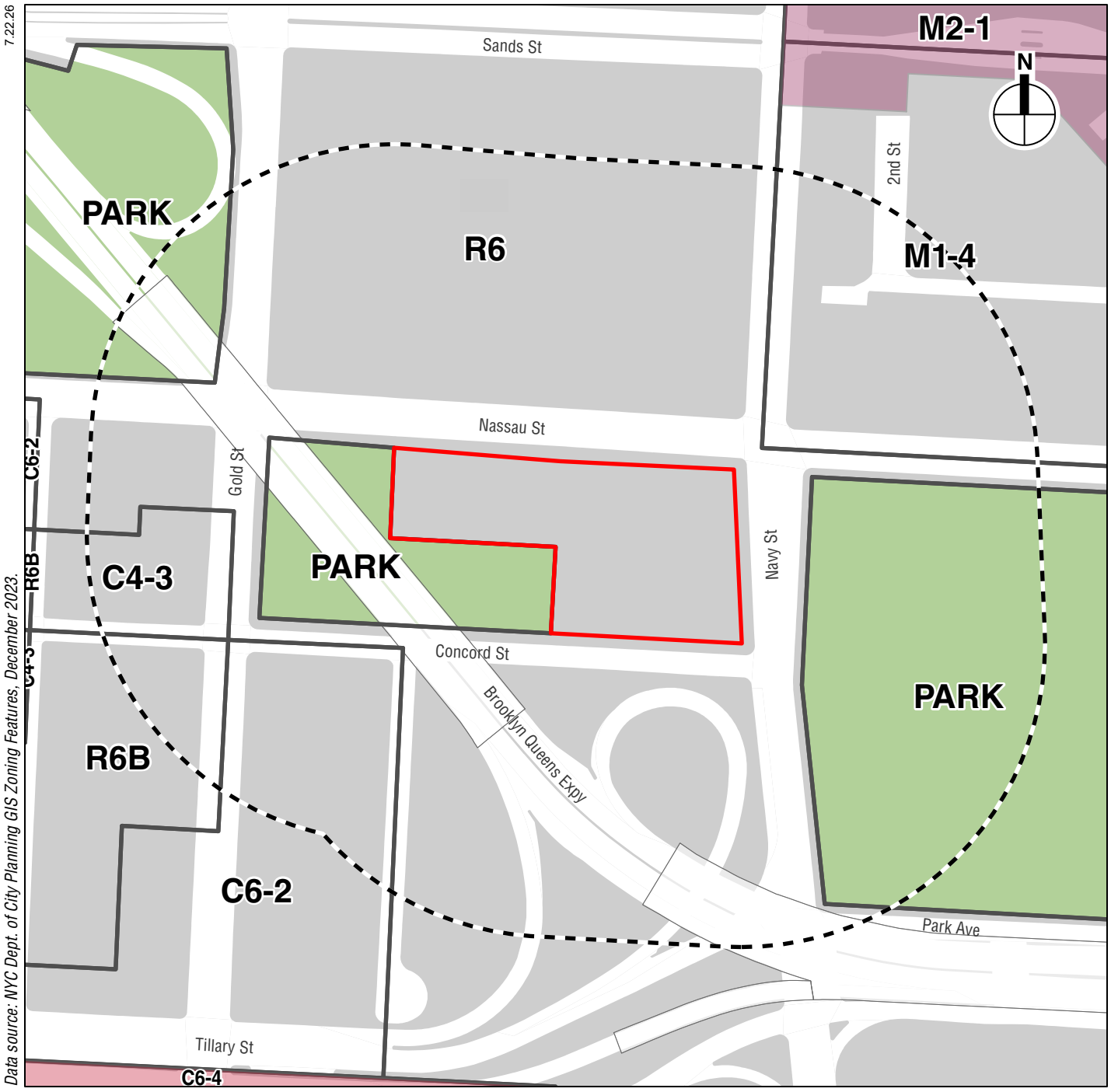
The eastern portion of the project site (Block 111, Lot 1) is occupied by P.S. 287 Dr. Bailey K. Ashford, a public school which is operated by the New York City Department of Education (DOE). The western portion of the project site (Block 110, Lot 25) is occupied by the Madison Square Boys & Girls Club and owned by 240 Nassau Street Holdings, LLC. The remainder of the subject block is occupied by the approximately 1.~~35~~50-acre Golconda Playground and contains play equipment, handball courts, basketball courts, and a skate park. The elevated BQE traverses the west side of the block above Golconda Playground.

PROPOSED PROJECT

The proposed project would result in the development of four buildings containing a total of 1,701,000 gsf: approximately 1,502 mixed-income residential DUs (approximately 302 affordable DUs); 34,000 gsf of retail; and 166,000 gsf of community facility use, consisting of 121,000 gsf of public school space (approximately 931 seats), 15,000 gsf of cultural center space, 30,000 gsf of community facility space, and approximately 37,050 sf (0.85 acres) of open space, of which 20,896 sf (0.48 acres) would be new publicly accessible open space.

The proposed actions would reintroduce the historic street grid with new, public outdoor space. A north-south public corridor is located at the historic location of Hudson Avenue and a new public corridor running east-west between the proposed buildings would connect Golconda Playground with Commodore Barry Park. Public programming would be located along Nassau and Concord Street frontages with the new public school located at the intersection of Nassau and Navy Streets and the community facility, cultural center, and senior affordable housing programs located adjacent to the Golconda Playground frontages. New retail space would be located along all three street frontages and along the interior public corridors to activate the new public outdoor space. The building massings for Buildings 1 and 3 would contextually respond to the public school in Building 2 and senior affordable housing in Building 4 by maximizing access to light and air being situated on opposing corners of the project site.

The new publicly accessible open space would unify Golconda Playground, Commodore Barry Park, and Farragut Houses. It is intended to enhance pedestrian connectivity throughout the neighborhood and serve as amenity for residents and the neighborhood. The new publicly accessible open space would provide approximately 0.48 acres (20,896 sf) of passive open space, expected to include seating and gathering areas, landscaped areas, and walkways. ~~Construction would begin with the development of two buildings: a mixed-use residential and community facility building on the west side of Nassau Street and a mixed-use retail and school building on the corner of Nassau and Navy Streets (see **Figures 5 and 6**). Upon completion, construction of a mixed-use retail and residential building at the intersection of Navy and Concord Streets, and a residential building on Concord Street adjacent to Golconda Playground would commence. Approximately 0.5 acres of privately-owned public space would be created between the buildings to connect to the basketball courts at Golconda Playground. Residential entrances would be located on Nassau and Concord Streets. Retail space would primarily front Navy Street, with limited frontage along Concord and Nassau Streets. The school and community facility (expected to provide community center and cultural programming) would be entered from Nassau Street with an additional community center entrance along Concord Street. No parking would be provided with the proposed project.~~ An axonometric diagram and site plan are shown in **Figures**



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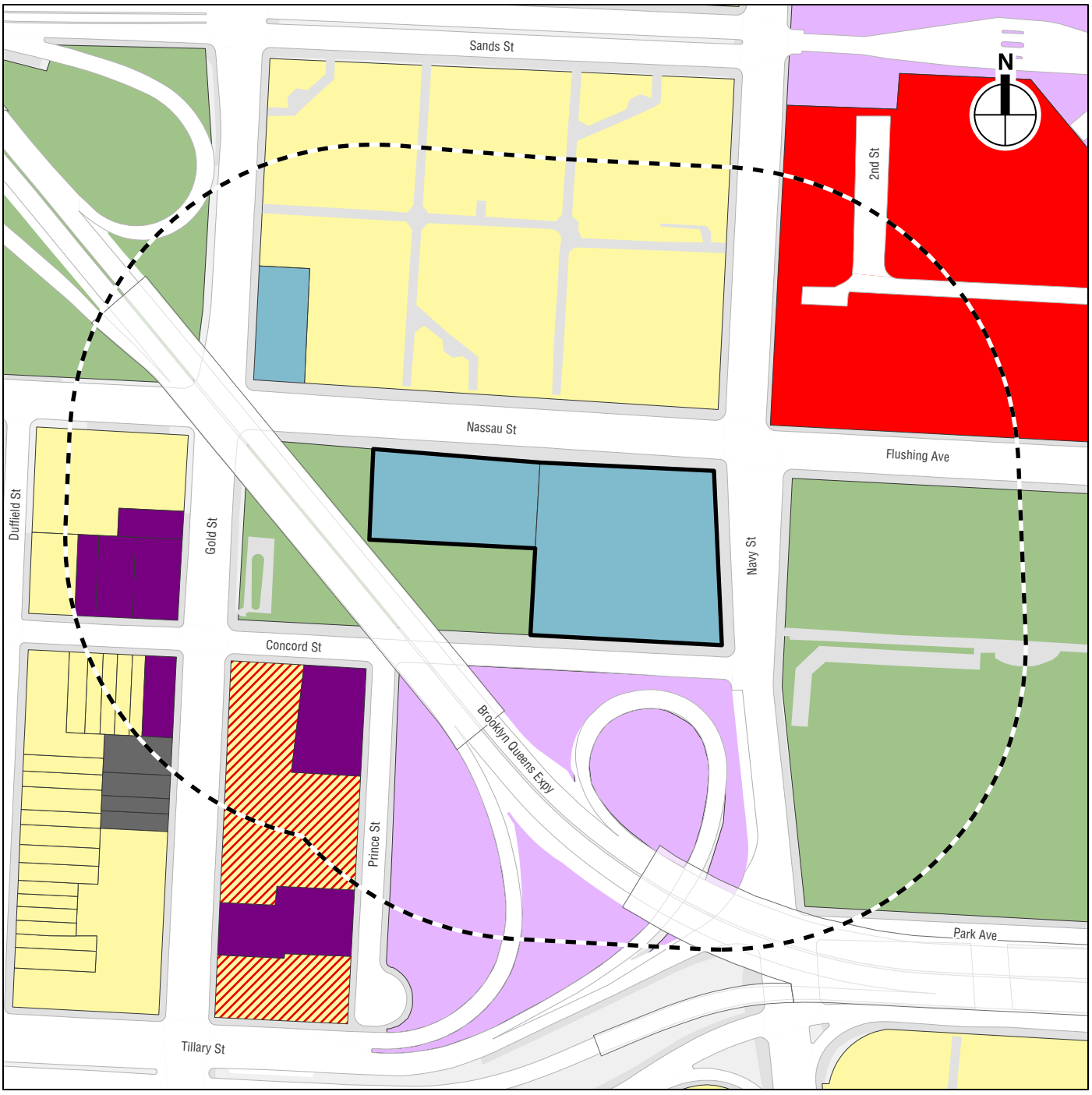
Existing Zoning

Figure 3



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Existing Land Use

Figure 4

5 and 6, respectively. Illustrative renderings of the proposed project are included ~~as~~ in **Figures 7 ~~through 9~~and 8**.

Building 1, located midblock on the south side of Nassau Street, would be a 63-story, mixed-use building that would have a height of approximately 718 feet (738 feet at top of bulkhead). Building 2 would be an eight-story community facility and commercial building located on the corner of Nassau and Navy Streets. It would rise to a maximum height of approximately 150 feet, inclusive of the bulkhead. Building 3 would be a 73-story, mixed-use residential and commercial building located at the corner of Navy and Concord Streets. The building would rise to a height of approximately 820 feet (840 feet at top of bulkhead). Building 4 would be an 18-story, mixed-use residential and community facility building on Concord Street, located midblock and adjacent to Golconda Playground. It would have a height of approximately 235 feet (265 feet including bulkhead). An existing curb cut on Nassau Street that serves the Madison Square Boys and Girls Club, and an existing curb cut on Concord Street that serves P.S. 287 and Community Roots Charter School would be eliminated with the proposed project, and no new curb cuts would be provided. Construction of the proposed project would occur in one continuous phase and is expected to take approximately 72 months. The existing P.S. 287 and the Community Roots Charter School are expected to relocate elsewhere within Community School District (CSD) 13 at the onset of construction.

The proposed actions would establish an MIH Area at the project site and modify the required percentage of floor area designated for affordable housing to create permanently affordable housing (modified Option 1). The EIS assumes 20 percent of the residential floor area under the MIH Program (up to ~~301~~ 302 units) would be affordable and targeted for households earning an average of 60 percent of Area Median Income (AMI). The remainder of the units would be market-rate units. With the proposed project, the project site would be developed to a maximum FAR of 18, as compared to the maximum permitted FAR of 4.8 under the No Action condition

DISCRETIONARY APPROVALS

The co-applicants are seeking the following discretionary approvals: (i) a zoning map amendment to change the project site from an R6 district to a C6-12 district; (ii) a zoning text amendment to modify Zoning Resolution (ZR) Section 74-752 to make the provisions applicable to the project site and permit modification of ZR Section 27-10 (Administration of Affordable Housing); (iii) a zoning text amendment to designate the project site as an MIH Area; and (iv) a special permit pursuant to ZR Section 74-752. The special permit would allow modification of certain affordable housing requirements, bulk regulations, ~~use, parking,~~and loading~~, and MIH~~ requirements by the CPC. The requested zoning approvals are described in more detail below:

- A zoning map amendment to change an existing R6 district to a C6-12 district. The proposed C6-12 district (R12 equivalent district) is a high density commercial district that allows residential, commercial and community facility uses (Use Groups I to VIII) to a maximum total FAR of 18. R12 districts have a maximum residential FAR of 15 for standard residences and a maximum residential FAR of 18 for buildings providing Qualifying Affordable Housing or Qualifying Senior Housing.

- A zoning text amendment to designate the project site as an MIH Area in Appendix F of the ZR.

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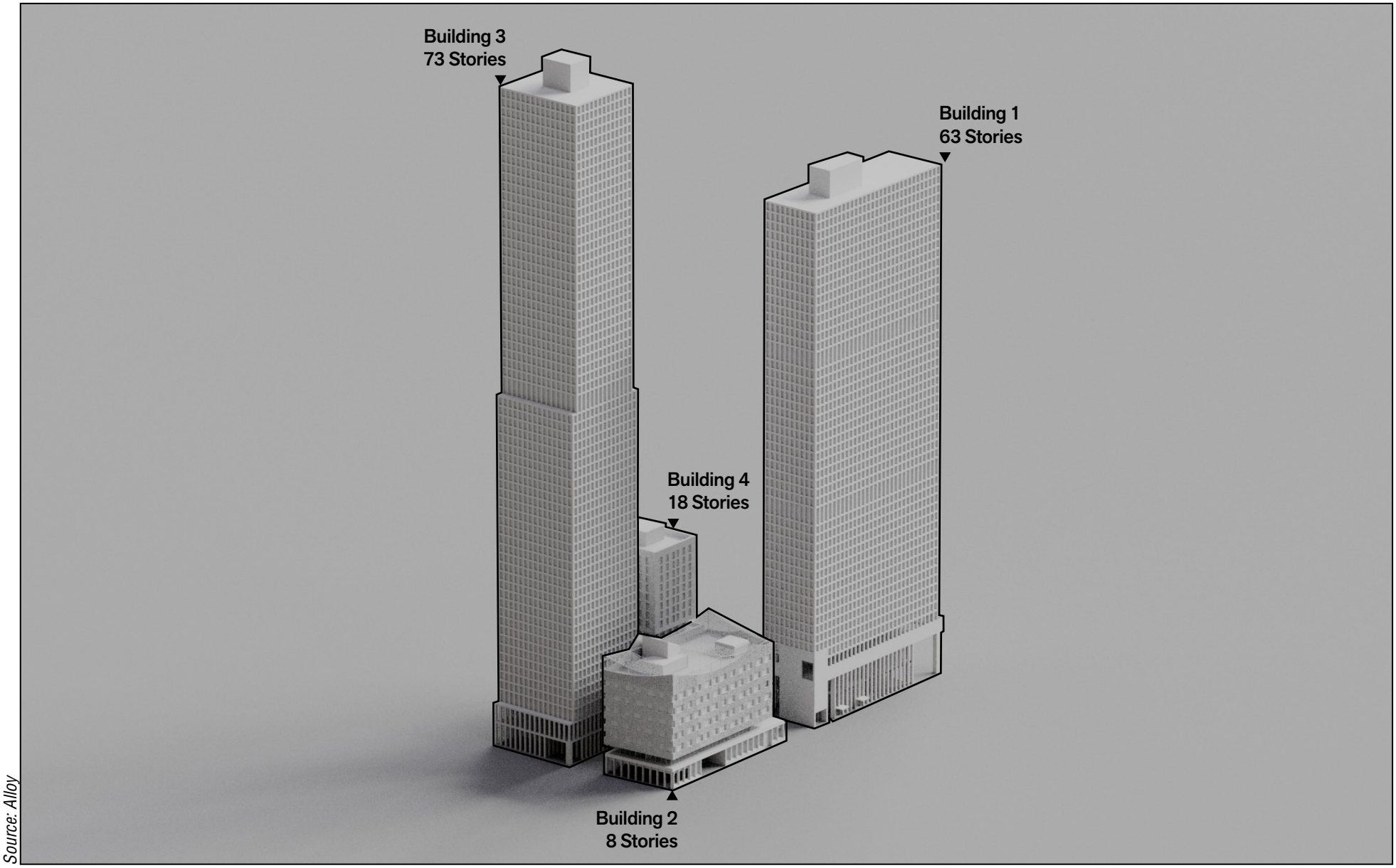

Source: Alloy

FOR ILLUSTRATIVE PURPOSES ONLY

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240 NASSAU STREET

Axonometric, View Looking Southwest

Figure 5

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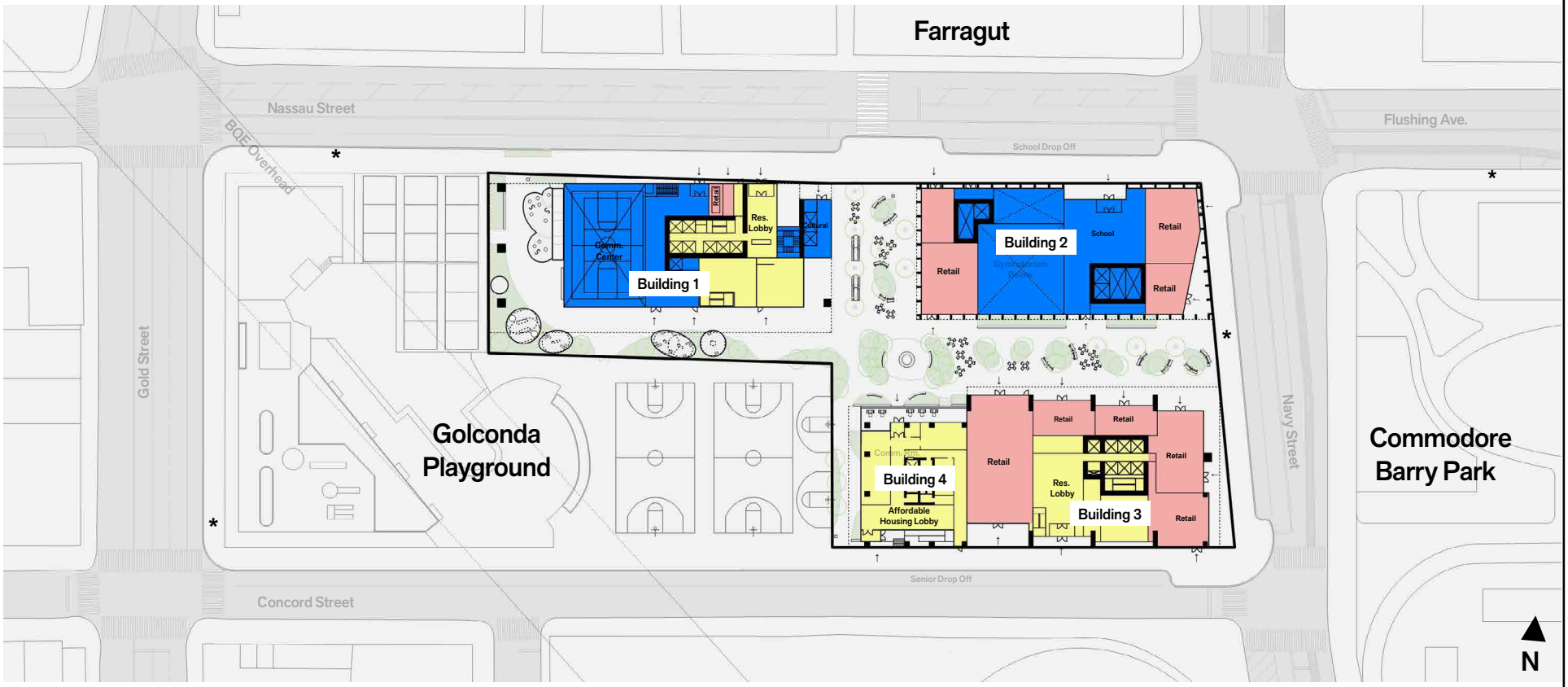

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Site Plan

Figure 6

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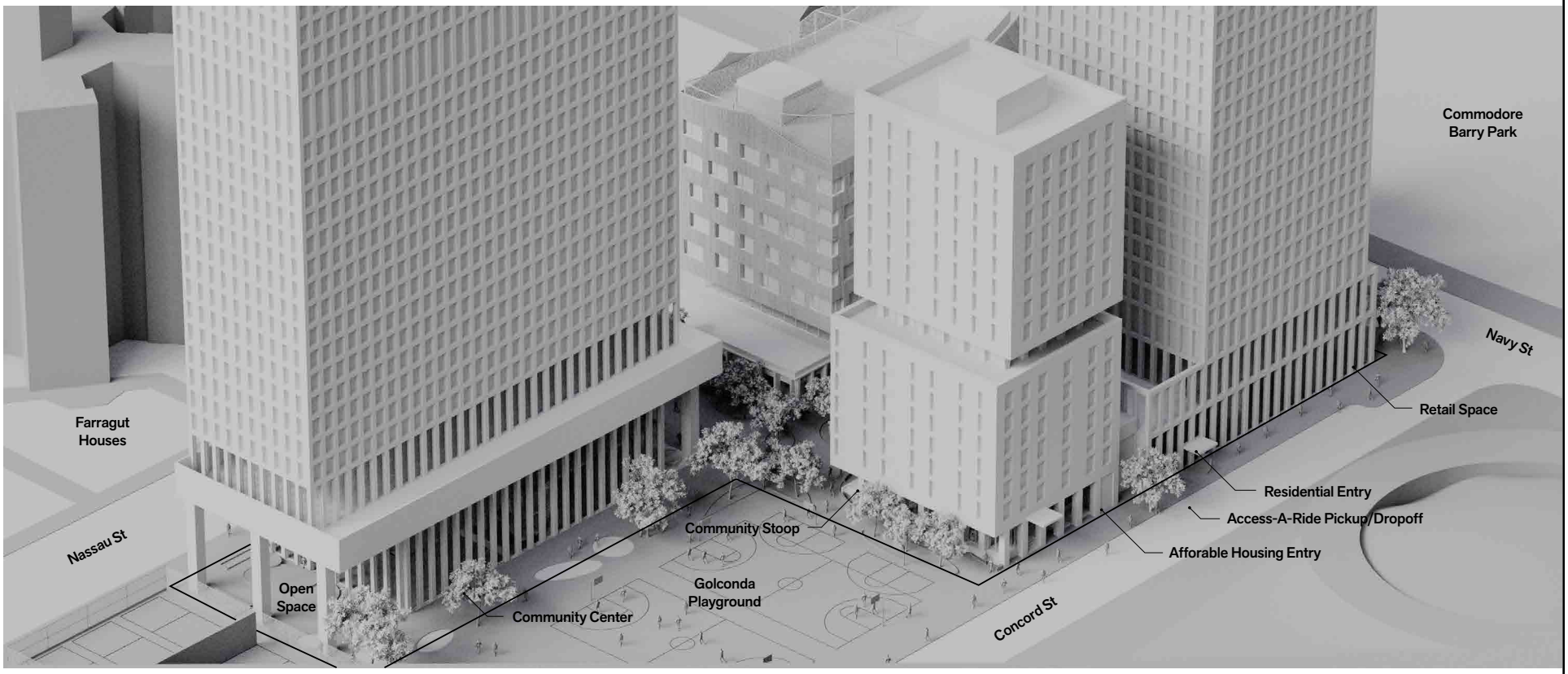

Project Site

Source: Alloy

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Illustrative Rendering, View Looking Northeast

Figure 7

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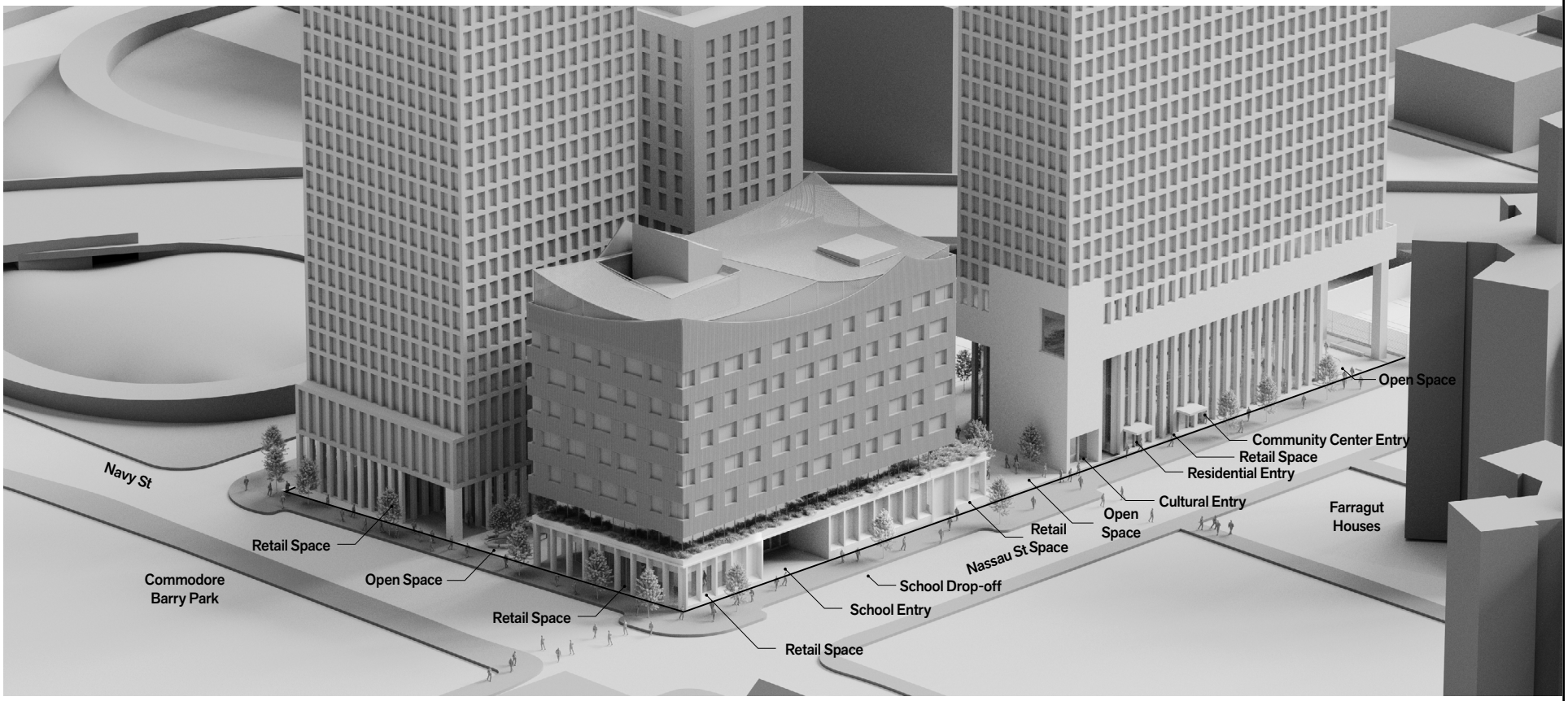

Project Site

Source: Alloy

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NYC Educational Construction Fund

240 NASSAU STREET

Illustrative Rendering, View Looking Southwest

Figure 8

- A zoning text amendment to modify ZR Section 74-752 to make the provisions applicable to the project site and permit modification of ZR Section 27-10 (Administration of Affordable Housing). ZR Section 74-752 allows the modification of ground floor use, MIH, accessory off-street parking and loading berth, and other bulk regulations (excluding FAR) for developments on land owned by ECF in an underlying C6-9 district within the Special Downtown Brooklyn District. The zoning text amendment would expand the applicability of the existing provisions to sites owned by ECF in the C6-12 district within Brooklyn CD 2 not within the Special Downtown Brooklyn District and to allow for modifications of the affordable housing requirements set forth in ZR Section 27-10. The proposed text amendment has limited applicability and would affect only the project site and no other sites.

- A special permit pursuant to ZR Section 74-752 to modify ZR Sections 23-342, 23-371(c)(1), 23-371(c)(2), 23-432, 23-433, 27-131, 27-151, 27-16, 36-62, and 35-631 to allow the modification of certain affordable housing requirements, bulk regulations, and loading requirements.

~~In addition to the zoning approvals, t~~The proposed ~~project~~ actions also include ~~requires~~ the transfer, reallocation, and lease of property among 240 Nassau Street Holdings, LLC~~the developer~~, ECF, and the City of New York to allow for ~~schools in the new location, the proposed development,~~the proposed project and ECF financing. Additionally, a determination from NYC Parks pursuant to ZR Section 23-381 is being sought to permit light and air for the legally required windows at the abutting lot lines between Buildings 1 and 4 and the abutting lot lines of Golconda Playground. As described below, the proposed project could also require additional approvals.~~ECF would issue tax exempt bonds to facilitate construction of the school.~~

- The relocation of P.S. 287 is subject to the approval of the PEP, a voting body overseeing New York City Public Schools. Any actions, including approvals by the PEP, that are necessary to facilitate the relocation of P.S. 287 and the Community Roots Charter School are not analyzed as part of this environmental review. It is anticipated that any such action(s) is/are expected to occur at a later date and will be the subject of a separate environmental review at that time pursuant to SEQRA and in accordance with CEQR.

- The co-applicants may potentially participate in NYCHA's TOA program, which would involve the allocation of PBV to create new senior housing opportunities for existing NYCHA residents in Building 4. The co-applicants propose that 20 percent of the project's residential floor area (302 affordable DUs) be provided as affordable housing. The co-applicants propose to map the project site with a modified version of MIH Option 1 that would allow 20 percent of residential floor area at a weighted average of 60 percent AMI (302 affordable DUs), with eight percent of floor area at 40 percent AMI. In the event the co-applicants and NYCHA participate in the TOA program (or a comparable affordable housing program), the modified Option 1 would permit a minimum of 15 percent of residential floor area at a weighted average of 60 percent AMI (207 affordable DUs), with six percent of floor area at 40 percent AMI, and the remaining five percent of residential floor area (95 affordable DUs) would be provided in Building 4 through the TOA program—together still yielding a total of 302 affordable DUs. In all cases, no unit would exceed 130 percent of AMI. TOA and PBV are part of the HUD RAD program and would be implemented pursuant to 24 CFR 983. The implementation of these programs would require an environmental review in accordance with the National Environmental Policy Act (NEPA) and HUD environmental standards at a future date when a RAD application is advanced.

PURPOSE AND NEED

The co-applicants propose the comprehensive redevelopment of the project site with a dynamic, mixed-use development that includes a new public school and residential, retail, community center, and cultural space, and publicly accessible~~new~~ open space. ECF is a New York State public benefit corporation that finances and ~~builds~~ develops mixed-use developments that feature new school facilities~~s~~ on behalf of DOE.

The existing public school building at 50 Navy Street that houses P.S. 287 (grades pre-Kindergarten through 5) and Community Roots Charter School (grades 6 through 8) is outmoded and in need of replacement. The aging building was built in 1953 and its electrical, ventilation, and acoustical systems are inadequate to serve the needs of the school. A recent DOE survey identifies outmoded conditions and noncompliance with Americans with Disabilities Act (ADA) accessibility standards in almost all of the building's rooms and spaces.[1] Overall, the building lacks the appropriate facilities to provide a modern learning environment The proposed actions would provide state-of-the-art school facilities for pre-Kindergarten through 8th grade. The improvements would achieve a better learning environment by providing modern educational facilities and additional public school capacity at the primary and intermediate school level in C~~ommunity School District~~SD 13.

ECF encourages the development of new public schools as part of mixed-use projects in which the public component is financed by tax-exempt bonds. ECF uses ground rents, lease payments, and/or tax equivalency payments from the non-school portions of a development to pay the debt service on the bonds issued to finance the public facilities.

In connection with the construction of a new public school on the project site, 240 Nassau Street Holdings, LLC, would develop new residential space, retail, community center, ~~and~~ cultural space, and publicly accessible~~new~~ open space. The proposed actions would facilitate the redevelopment of an underutilized parcel that is well positioned to support new development at higher densities. The project site is proximate to transit, with bus lines on Jay Stret and the nearest subway station, the York Street Station, approximately 0.4 miles away. Further, the site is bounded by three wide streets (Navy, Nassau and Concord Streets) that can accommodate higher density buildings, and the site is surrounded by parks, low-lying BQE infrastructure, and Farragut Houses, with residential buildings set back from the street and interspersed among landscaped open areas.

The proposed actions would facilitate the creation of up to 1,502 ~~units~~ DUs (~~up to~~ 20 percent of the proposed residential floor area would be designated as affordable housing) in accordance with the MIH Program. The proposed project would address the dire need for housing, including affordable and senior housing, in New York City. The proposed project would also support economic and cultural growth by introducing cultural and community space for local artists, ~~and~~ neighborhood retail space, which would enliven the block and bring amenities to neighborhood residents. The proposed project would introduce approximately 0.85 acres of open space, of which 0.48 acres would be publicly accessible. The proposed open space would provide recreational

[1] New York City Department of Education. *Building Condition Assessment Survey 2022-2023.* July 11, 2023.

opportunities and visual and physical open space connections between the proposed uses on the project site and Golconda Playground to the west and Commodore Barry Park to the east.

ANALYSIS FRAMEWORK

The EIS analyses will be undertaken pursuant to SEQRA. The 2025 New York *City Environmental Quality Review (CEQR) Technical Manual* will generally serve as a guide with respect to environmental analysis methodologies and impact criteria for evaluating the effects of the proposed project. Based on the location and size of the proposed project, certain CEQR technical areas are screened out of further assessment in the EIS, including Energy, Solid Waste/Sanitation Services, and Natural Resources. In disclosing impacts, the EIS will consider the proposed project's potential adverse impacts on the environmental setting. It is anticipated that the proposed project would be operational in 2033. Consequently, the environmental setting is not the current environment, but the future environment. Therefore, the technical analyses and consideration of alternatives assesses existing conditions and forecasts these conditions to 2033 with and without the proposed project.

THE FUTURE WITHOUT THE PROPOSED PROJECT

For the purposes of the EIS, it is assumed that in the future without the proposed project (the "No Action" condition), the existing school (P.S. 287~~)~~ and the Community Roots Charter School) on Block 111, Lot 1 would remain; and the Madison Square Boys and Girls Club on Block 110, Lot 25 would be closed. Block 110, Lot 25 would be developed with an as-of-right, seven-story, 75-foot market-rate building (110 feet including bulkhead) containing approximately 83,500 gsf of residential space (approximately 84 DUs) ~~market rate residential building~~ that complies with the current R6 zoning regulations. The building under the No Action condition feasibly maximizes the allowable residential FAR of 3.0 (approximately 71,000 zoning square feet [zsf], of which approximately 97 percent of the available FAR is utilized) under the existing R6 zoning district. The site of the Madison Square Boys and Girls Club is within 100 feet of a wide street and developments have a maximum height of 75 feet. The No Action estimated population is approximately 171 residents and 75 workers on the project site.[2] ~~would contain approximately 83,500 gsf of market-rate residential use (approximately 84 units).~~

For each technical analysis in the EIS, the No Action condition would also incorporate approved or planned development projects within the appropriate study area that are likely to be completed by the analysis year.

THE FUTURE WITH THE PROPOSED PROJECT

For most of the technical areas of analysis identified in the *CEQR Technical Manual*, conditions with the proposed project would be compared to the No Action condition (see **Table 1**).

[2] Residential population is based on the average household size of 2.03 persons within Brooklyn CD 2. The estimate of workers is based on standard industry rates, as follows: 1 employee per 25 DU and 1 staff per 10 students.

Table 1
Comparison of No Action and With Action Scenarios

Use	No Action	With Action	Increment
Residential (DU)	84	1,502	+1,418
Retail (GSF)	0	34,000	+34,000
Community Facility (GSF)	0	~~45,000~~30,000	+~~45,000~~30,000
Cultural (GSF)	0	15,000	+15,000
Primary School and Intermediate School (GSF)	110,000	~~120,715~~121,000	~~+10,715~~+11,000
Students[1]	721	~~929~~931	~~+208~~+210
Staff[2]	72	93	+21
~~Accessory Parking~~	~~0~~	~~0~~	~~0~~

Note:
[1] Primary school square footage assumes 130 sf per seat.
[2] Assumes 1 staff per 10 students.

As compared to the No Action condition, the proposed project would add approximately 1,~~420~~ 418 ~~dwelling units~~DUs (approximately 1.4 million gsf of residential space); approximately 34,000 gsf of retail space; approximately 15,000 gsf of cultural center space, approximately 30,000 gsf of community facility space; and approximately 11,000 gsf of public school use. The With Action condition includes a total of approximately 1.7 million gsf (approximately 1.4 million zsf, which fully maximizes the allowable residential FAR of 18.0). Of the total 1.7 million gsf, approximately 1.5 million gsf would be residential floor area. The With Action estimated population is approximately 3,049 residents and 300 workers on the project site,[3] which would result in an increment of 2,879 residents and 225 workers as compared to the No Action condition. ~~approximately 45,000 gsf of cultural community facility space; and an additional approximately 10,715 gsf of public school use.~~

The proposed actions would establish an MIH Area at the project site and modify the required percentage of floor area designated for affordable housing to create permanently affordable housing. Within MIH Areas, all housing developments, enlargements, and conversions that meet the criteria set forth in the MIH program must comply with the requirements of MIH Option 1, Option 2, or Option 3 as described below.

- Option 1: 25 percent of the residential floor area shall be provided as housing affordable to households at an average of 60 percent of the AMI, with six percent of floor area at 40 percent AMI and with no unit targeted at a level exceeding 130 percent of AMI.
- Option 2: 30 percent of the residential floor area shall be provided as housing affordable to households at an average of 80 percent of AMI, with no unit targeted at a level exceeding 130 percent of AMI.
- Option 3: 20 percent of the total residential floor area must be for housing units for residents with incomes averaging 40 percent of AMI and no direct subsidies could be used for these units except where needed to support more affordable housing.

In addition to the options above, the City Council may elect to map Option 4 (except in certain neighborhoods in Manhattan), which requires that 30 percent of the total residential floor area

[3] Estimate of workers based on standard industry rates, as follows: 1 employee per 25 DU; 1 employee per 333 sf of local retail; 1 employee per 1,000 sf of community facility space; 1 employee per 1,000 sf of cultural space; and 1 staff per 10 students.

must be for housing units for residents with incomes averaging 115 percent of AMI, with no units above 135 percent AMI; and no direct subsidies.

The co-applicants propose that 20 percent of the project's residential floor area (302 affordable DUs) be provided as affordable housing. The co-applicants propose to map the project site with a modified version of MIH Option 1 that would allow 20 percent of residential floor area at a weighted average of 60 percent AMI (302 affordable DUs), with eight percent of floor area at 40 percent AMI. The MIH requirement ensures that a percentage of residential floor area in any future development within the MIH Area is permanently affordable. There is currently no MIH requirement for residential development at the project site. ~~The With-Action condition assumes 20 percent of the residential DUs (up to 301 units) would be affordable and targeted for households earning an average of 60 percent of AMI. This assumption differs from standard MIH Option 1, which requires 25 percent of the residential floor area to be affordable to households earning an average of 60 percent of AMI.~~ The remainder of the units are assumed to be market-rate units. ~~The proposed project contemplates a portion of the residential units would be set aside as senior housing, subject to the availability of public subsidy. However, t~~ As discussed above, in the event the co-applicants and NYCHA participate in the TOA program (or a comparable affordable housing program), the modified MIH Option 1 would permit a minimum of 15 percent of residential floor area at a weighted average of 60 percent of AMI (207 affordable DUs), with six percent of floor area at 40 percent AMI, and the remaining five percent of residential floor area (95 affordable DUs) would be provided in Building 4 through the TOA program—together still yielding a total of 302 affordable DUs. In all cases, no unit would exceed 130 percent of AMI. To ensure a conservative analysis, the With Action condition assumes that ~~301~~ 302 ~~units~~ DUs (or approximately 20 percent of residential floor area) would be affordable ~~units~~, as these generate a greater residential population and more demand on certain community facilities as compared to senior housing).

~~In the With Action Condition, the Madison Square Boys & Girls Club would be closed. A new replacement community center (approximately 26,000 sf), a second community space (approximately 2,000 sf) and a small cultural center (approximately 10,000 sf) would comprise the With Action community facility uses.~~

ENVIRONMENTAL REVIEW PROCESS

Based on its review of the Environmental Assessment Form (EAF), ECF has determined that the proposed project has the potential to result in significant adverse environmental impacts and pursuant to SEQRA, has issued a Positive Declaration requiring that an EIS be prepared in conformance with all applicable laws and regulations, including SEQRA, the City's Executive Order No. 91, CEQR regulations (August 24, 1977) and the guidelines of the ~~*2021*~~ 2025 *CEQR Technical Manual*. In accordance with SEQRA, the DSOW ~~addition, ECF has published this Draft Scope of Work~~ to prepare the EIS was issued on December 22, 2025. The general public, public agencies, Brooklyn Community Board 2, elected officials, and other interested groups were invited to comment on the DSOW, either in writing or orally, at a virtual public scoping meeting held on January 27, 2026. ~~for the purpose of accepting comments on the Draft Scope.~~ Comments received during the DSOW's public hearing, and written comments received ~~through the close of the comment period, will be~~were considered and incorporated, as appropriate, into ~~a Final Scope of Work~~the FSOW. ECF, as Lead Agency, oversaw the preparation of the FSOW, which incorporates all relevant comments made during the scoping process and includes any other necessary changes to the scope of work for the EIS. **Appendix 1** includes responses to comments made on the DSOW. All oral comments received at the meeting as well as submitted written comments are included in

Appendix 2. The DEIS will be prepared in accordance with the FSOW. ~~The Final Scope of Work will be used as a framework for preparing the DEIS.~~

Once ECF has determined that the DEIS is complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the ULURP application to afford all interested parties the opportunity to submit oral and written comments. The record will remain open for 10 days after the public hearing to allow additional written comments on the DEIS. At the close of the public review period, a Final EIS (FEIS) will be prepared that will respond to all substantive comments made on the DEIS, along with any revisions to the technical analyses necessary to respond to those comments. The FEIS will then be used by the decision-makers to evaluate SEQR findings, which address project impacts and proposed mitigation measures, in deciding whether to approve the requested discretionary actions, with or without modifications. ~~a Notice of Completion will be prepared and published in accordance with applicable regulations. The DEIS will be subject to public review, in accordance with CEQR and SEQRA, with a public hearing and a period for public comment. ECF will issue a Notice of Completion on the Final EIS (FEIS), which will include responses received to comments on the DEIS. Lastly, ECF as lead agency, will make SEQRA findings based on the FEIS, before making a decision on project approval.~~

C. SCOPE OF WORK

PROJECT DESCRIPTION

The first chapter of the EIS introduces the reader to the proposed project and provides the project data for which impacts are assessed. The chapter will contain a brief history of the uses on the project site; the proposed development program; a description of the design of the proposed buildings; figures depicting the proposed development; and a discussion of the approvals required, procedures to be followed, and a description of the No Action condition. The role of the lead agency for SEQRA will also be described as well as the environmental review process to aid in decision-making.

LAND USE, ZONING, AND PUBLIC POLICY

The proposed project will require city and state discretionary actions, including zoning approvals and ECF business terms; therefore, a land use and zoning analysis will be required. A land use analysis characterizes the uses and development trends in the area that may be affected by a proposed project. The analysis also considers the project's compliance with and effect on the area's zoning and other applicable public policies. That assessment, which provides a baseline for other analyses, will consist of the following tasks:

- Provide a brief development history of the project site and study area.
- Describe conditions on the project site, including existing uses and the current zoning.
- Describe predominant land use patterns in the study area, including recent development trends. The study area will include land uses within approximately 400 feet of the project site.
- Provide a clear zoning map and discuss existing zoning and recent zoning actions in the study area.
- Provide an assessment of the proposed project's consistency with the policies of the City's Waterfront Revitalization Program (WRP).

- Summarize other public policies that may apply to the project site and study area.
- Prepare a list of other projects expected to be built in the study area by the proposed project's build year (aka "No Action" projects). Describe the effects of these projects on land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study area, including plans for public improvements.
- Describe the proposed actions and provide an assessment of the potential effects on land use trends, zoning, and public policy. Consider the effects related to issues of compatibility with surrounding land use, consistency with zoning and other public policies, and the effect of the project on development trends and conditions in the study area.

SOCIOECONOMIC CONDITIONS

The socioeconomic character of an area includes its population, housing, and economic activity. There is the potential for socioeconomic changes when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area. This chapter will assess the proposed project's potential effects on the socioeconomic character of the study area as required by CEQR.

According to the *CEQR Technical Manual*, the five principal issues of concern with respect to socioeconomic conditions are whether a proposed action could result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on a specific industry.

The proposed project would not result in any direct residential or business displacement; therefore, assessments are not warranted for direct residential or business displacement. With respect to indirect residential displacement, the proposed project would exceed the ~~200~~250-unit CEQR threshold warranting assessment; the scope of work for this analysis is described below. The proposed project will also be screened for potential impacts related to indirect business displacement and potential adverse effects on specific industries.

INDIRECT RESIDENTIAL DISPLACEMENT

The analysis will start with a preliminary assessment that presents demographic and residential market trends and conditions for the study area using U.S. Census data, American Community Survey data, New York City Department of Finance Real Property Assessment Data (RPAD) data, as well as current real estate market data. Following *CEQR Technical Manual* guidelines, the preliminary assessment will perform the following step-by-step evaluation:

- **Step 1:** Determine if the project's increase in population is large enough relative to the size of the population expected to reside in the study area without the project to affect real estate market conditions in the study area. According to *CEQR Technical Manual* analysis thresholds, if the population increase resulting from a proposed action is five percent or greater in that project's socioeconomic study area, that incremental population may be large enough to affect real estate market conditions, and Step 2 of the preliminary assessment is warranted. If the population increase is more than 10 percent in that study area, a detailed analysis is warranted.~~Determine if the proposed project would add new population with higher average~~

~~incomes compared to the incomes of the study area population and any new population expected to reside in the study area in the future without the project. If the expected average incomes of the new population would be similar to the average incomes of the study area populations and the population added by any planned development projects in the future, no further analysis is necessary. If the project would introduce a more costly type of housing compared to existing housing such that the expected average incomes of the new population would exceed the average incomes of the study area population, then Step 2 of the analysis will be conducted.~~

- **Step 2:** Determine if the project would add new population with higher average incomes compared with the average incomes of the existing populations and any new population expected to reside in the study area without the project. In the With Action condition, if the average household income of the incremental population introduced by the RWCDS exceeds the average household income of the existing population in the study area, Step 3 of the preliminary indirect residential displacement assessment is required.~~Determine if the proposed project population is large enough to affect real estate market conditions in the study area. If the population increase is greater than 5 percent in the study area as a whole or within any identified subareas, then Step 3 will be conducted.~~
- **Step 3**: Consider whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends.

A detailed analysis, if warranted, would utilize more in-depth demographic analysis and field surveys to characterize existing conditions of residents and housing, identify populations at risk of displacement, assess current and future socioeconomic trends that may affect these populations, and examine the effects of the proposed project on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk.

COMMUNITY FACILITIES AND SERVICES

As defined for CEQR analysis, community facilities are public or publicly funded schools, libraries, child care centers, health care facilities and fire and police protection. A project can affect community facility services directly, when it physically displaces or alters a community facility; or indirectly, when it causes a change in population that may affect the services delivered by a community facility. This chapter of the DEIS will evaluate the effects on community services due to the proposed project. In accordance with the thresholds of the *CEQR Technical Manual*, the proposed project is not expected to trigger detailed analyses of high schools, outpatient health care facilities or police and fire protection.

PUBLIC SCHOOLS

A schools analysis is required under CEQR for proposed actions that would result in more than ~~50~~ 100 elementary/middle school or 150 high school students. The proposed number of residential units will exceed the CEQR threshold in Brooklyn, requiring a detailed analysis for elementary/middle schools. The proposed project includes the creation of a replacement facility for Pre-Kindergarten through 8 grades, including Special Education students.

- The primary study area for the analysis of elementary and intermediate schools will be the school district's "sub-district" in which the project site is located [Community School District (CSD) 13, Sub-district 2 (DUMBO/Navy Yard/Fort Greene)].

- Existing capacity, enrollment, and utilization data for all public elementary and intermediate schools within Sub-district 2 will be provided for the current (or most recent) school year, noting any specific shortages of school capacity, based on data from DOE.
- Conditions that would exist in the No Action condition for Sub-district 2 will be identified, taking into consideration projected changes in future enrollments, including those associated with other developments in the affected sub-districts, using the SCA's Projected New Housing Starts. Plans to alter school capacity either through the DOE 2025-2029 Five Year Capital Plan or as a result of the proposed replacement facility will be identified and incorporated into the analysis. The capacity of transportable classrooms, mini-schools, and annexes will not be included in the future conditions analysis.
- Future conditions with the p~~P~~roposed a~~A~~ctions will be analyzed, adding students likely to be generated by the proposed project to the projections for the future No Action condition. Impacts will be assessed based on the difference between the future With Action projections and the future No Action projections.
- Consistent with *CEQR Technical Manual* guidelines, the potential for significant adverse impacts to elementary or intermediate schools would be identified if: (1) a utilization rate of the elementary and/or intermediate schools in the sub-district study area is equal to or greater than 100 percent in the With- Action condition; and (2) the 100 percent utilization threshold is exceeded by 100 or more new students. If impacts are identified, mitigation will be developed in consultation with the SCA and the DOE.

EARLY CHILDHOOD PROGRAMS

It is likely that the proposed number of affordable residential units will exceed the minimum number of residential units (110 affordable units in Brooklyn) requiring a detailed analysis of early childhood programs:

- Existing publicly funded means-tested early childhood programs within approximately 1.5 miles of the project site will be identified with location, number of slots (capacity), enrollment, and utilization in consultation with the latest DOE dataset for enrollment and capacity.
- For the No Action condition, information will be obtained for any changes planned for child care programs or facilities in the area. Any expected increase in the population of eligible children under age six, using the No Action condition, will be incorporated into the analysis. The available enrollment, capacity, and utilization rate for the study area will be calculated for the No Action condition.
- The potential effects of the additional eligible children resulting from the proposed actions will be assessed by comparing the estimated net demand over capacity to a net demand over capacity in the No Action condition.
- The analysis will determine whether the proposed actions would result in significant adverse impacts to means-tested early childhood programs, if the proposed actions would result in both of the following: (1) a collective utilization rate of the means-tested early childhood programs in the study area that is greater than 100 percent in the With Action condition; and (2) an increase of five percent or more in the collective utilization rate of the means-tested early childhood programs in the study area between the No Action and With Action conditions.

LIBRARIES

The proposed project would also exceed the CEQR threshold requiring analysis of public libraries in Brooklyn (~~734~~ 834 units):

- The assessment will identify and present on a map library branch(es) within the borough of Brooklyn serving the area within approximately ¾-mile of the project site.
- Existing libraries within the study area and their respective information services, including holdings, will be described. Details on library operations will be based on publicly available information and/or consultation with Brooklyn Public Library officials. Holdings per resident may be estimated to provide a quantitative gauge of available resources in order to form a baseline for the analysis.
- For the No Action condition, projections of population change in the study area and information on any planned changes in library services or facilities will be described and assessed. Using the information gathered for existing conditions, holdings per resident in the No Action condition will be estimated.
- The effects of the addition of the population resulting from the proposed actions will be assessed. Holdings per resident in the With Action condition will be estimated and compared to the No Action holdings estimate.
- If the proposed actions would increase a branch library's ¾-mile study area population by five percent or more over No Action levels, and it is determined, in consultation with the Brooklyn Public Library, that this increase would impair the delivery of library services in the study area, there may be a significant adverse impact warranting consideration of mitigation.

OPEN SPACE

This chapter will assess the potential impacts on area open space resources from the project's introduction of additional residential, student, and worker populations to the project site. The proposed project would exceed the ~~200 resident~~ CEQR analysis threshold of 250 or more incremental units in an existing R6 district requiring a residential open space analysis of indirect effects, but not the 500-worker threshold requiring a non-residential open space analysis of indirect effects. An assessment of direct effects on open spaces may also be warranted, depending on the results of other analyses including air quality, noise, and shadows. The methodology set forth in the *CEQR Technical Manual* consists of establishing a study area for analysis, calculating the total population in the study area, and creating an inventory of publicly accessible open spaces within a ½-mile of the project site; this inventory will include examining these spaces for their facilities (active vs. passive use), condition, and use (crowded or not). The chapter will project conditions in the future without the proposed project and assess impacts of the proposed project based on quantified ratios and qualitative factors. A preliminary assessment will be conducted and if warranted the analysis will include a detailed open space assessment prepared following the guidelines of the *CEQR Technical Manual.*

SHADOWS

~~The~~ According to the *CEQR Technical Manual*, ~~requires~~ a shadows assessment is appropriate only if a project would: (a) result in With Action structures of 250 feet or more; or (b) result in With Action structures of between 50 and 250 feet and be located adjacent to, within, or across the street from a sunlight sensitive resource(s); and (c) result in greater than 50 feet of incremental height

change or substantial changes in bulk (i.e., a wider With Action building envelope than the No Action building.~~for proposed actions that would result in new structures or additions to existing structures greater than 50 feet in incremental height, or of any height if the project site is adjacent to a sunlight-sensitive resource.~~ A shadows assessment examines whether proposed structures could cast shadows on sunlight-sensitive resources, which include publicly accessible open spaces, sunlight-sensitive features of historic resources, and natural features.

The proposed project would result in new structures greater than 50 feet in height. Further, the project site is located adjacent to several sunlight-sensitive resources, including Golconda Playground located adjacent to the west and Commodore Barry Park located across Navy Street to the east. Therefore, a shadow study will be conducted to determine how project-generated incremental shadow might affect these and any other nearby sunlight-sensitive resources.

The shadows assessment will follow the methodology described in the ~~2021~~2025 *CEQR Technical Manual*. It will include the following tasks:

- Develop a base map illustrating the project site in relationship to publicly accessible open spaces, historic resources with sunlight-dependent features, and natural features in the area.
- Determine the longest possible shadow that could result from the proposed project to determine which sunlight-sensitive resources could potentially be affected.
- Develop a three-dimensional computer model of the elements of the base map developed in the preliminary assessment.
- Using three-dimensional computer modeling software, determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the proposed actions on four representative days of the year.
- Document the analysis with graphics comparing shadows resulting from the No Action condition with shadows resulting from the proposed project, with incremental shadow highlighted in a contrasting color. Include a summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource.
- Assess the significance of any shadow impacts on sunlight-sensitive resources. If any significant adverse shadow impacts are identified, identify and assess potential mitigation strategies.

If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

HISTORIC AND CULTURAL RESOURCES

The *CEQR Technical Manual* identifies historic resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic resources include designated New York City Landmarks (NYCLs) and Historic Districts (NYCHDs); properties calendared for consideration as NYCLs by the Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation; properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing, or properties contained within a S/NR listed or eligible district; properties recommended by the New York State Board for listing on the S/NR; and National Historic Landmarks (NHLs).

According to the *CEQR Technical Manual,* a historic and cultural resources assessment is required if a project would have the potential to affect either archaeological or architectural resources.

The proposed project requires subsurface disturbance at the project site. However, in comments dated December 17, 2025, the New York City Landmarks Preservation Commission (LPC) determined that the project site has no archaeological significance. Therefore, no further archaeological analysis is required.

The eastern portion of the project site (Block 111, Lot 1) is occupied by the P.S. 287 Dr. Bailey K. Ashford school which was built ca. 1953. The school building has not previously been identified as an architectural resource; however, it meets the age criteria for listing on the S/NR and thus will require more research to determine whether it could meet other criteria for S/NR listing. In a comment letter dated December 17, 2025, LPC determined that the project site has no architectural significance. Therefore, there are no known historic or potential architectural resources on the project site.

However, there are architectural resources in the study area. Therefore, consistent with the *CEQR Technical Manual*, the historic and cultural resources analysis will include the following tasks:

~~• Initiate consultation with LPC to request a preliminary determination of archaeological sensitivity for the project site. If LPC determines that the project site is not sensitive for archaeological resources, no further archaeological analysis will be required. If LPC determines that the project site may be sensitive for archaeological resources, a Phase 1A Archaeological Documentary Study of the affected area will be prepared as directed by LPC.~~

• Identify the study area for architectural resources. For this project, the study area for architectural resources will be approximately 400 feet beyond the borders of the project site to account for the potential for visual and contextual changes as well as direct physical impacts to architectural resources.

~~• Given the age of the existing school building on the project site, prepare an informational package for submission to LPC to request LPC's evaluation of the project site building. If the school building is determined by LPC to be eligible for New York City Landmark designation and/or listing on the State and National Registers of Historic Places, additional coordination with LPC to evaluate the building would be required and summarized in the EIS.~~

• Map and briefly describe known and potential architectural resources ~~on the project site and~~ in the study area.

• In accordance with the guidance of the *CEQR Technical Manual*, a field survey of the study area will be conducted to identify if there are any potential architectural resources that could be affected by the proposed project. Potential architectural resources comprise properties that appear to meet the eligibility criteria for NYCL designation and/or S/NR listing. The field survey will be supplemented with research at relevant repositories, online sources, and current sources prepared by LPC and the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP).

• Assess the potential effects of the proposed project on ~~archaeological and~~any identified architectural resources, including visual and contextual changes as well as any direct physical impacts. Potential effects will be evaluated through a comparison of the future With Action and No Action conditions, and a determination made as to whether any change would alter or eliminate the significant characteristics of the resource that make it important. ~~The analysis will include a description of the consultation undertaken with LPC.~~

• If ~~necessary~~applicable, develop ~~mitigation~~ measures in consultation with LPC to avoid, minimize, or mitigate ~~or reduce potential significant~~ any adverse impacts on historic or cultural resources ~~will be identified, in consultation with LPC~~.

~~If LPC determines that the project site may be sensitive for archaeological resources, a Phase 1A Archaeological Documentary Study ("Phase 1A Study") will be prepared. The Phase 1A Study would assess the archaeological sensitivity of the project site with respect to both precontact and historic period archaeological resources. The Phase 1A Study would outline the site's precontact and historic contexts, environmental setting, and development history and past disturbance in order to identify any potential resource types that may be present on the site. The Phase 1A Study will also make a determination as to whether or not an additional archaeological investigation (e.g., a Phase 1B Archaeological Investigation) is necessary. The conclusions of the Phase 1A Study would be summarized in the EIS.~~

URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the *CEQR Technical Manual*, ~~if a project requires actions that would result in physical changes to a project site beyond those allowable by existing zoning and which could be observed by a pedestrian from street level,~~ a preliminary assessment of urban design and visual resources ~~should be prepared.~~ may be warranted when the project may have effects on one or more of the elements that contribute to the pedestrian experience, and an analysis is appropriate for projects that result in substantial physical alteration to the built or natural environment's building bulk, public spaces, or visual resources.

Since the proposed project requires a zoning map amendment, a zoning text amendment, and a special permit to allow modification of bulk, use, loading, and MIH requirements that would facilitate buildings over 250 feet tall and changes to public open space~~a rezoning that would allow for additional floor area~~, a preliminary assessment of urban design and visual resources is warranted and will be prepared as part of the EIS. The preliminary assessment will determine whether the proposed project, in comparison to the No Action condition, would ~~create a~~have the potential for ~~change to the~~ a pedestrian to observe, from street level, a substantial physical alteration beyond that allowed by existing zoning. ~~experience that is significant enough to require greater explanation and further study.~~ The study area for the preliminary assessment of urban design and visual resources will be consistent with that of the study area for the analysis of land use, zoning and public policy. The preliminary assessment will include a concise narrative of the existing area, the No Action condition, and the future with the proposed project. The analysis will draw on information from field visits to the study area and will present photographs, zoning and floor area calculations, building heights, project drawings and site plans, and view corridor assessments.

According to the 2025 *CEQR Technical Manual*, the lead agency must exercise its discretion to determine if a more detailed analysis is needed. ~~A detailed analysis will be prepared if warranted based on the preliminary assessment. As described in the *CEQR Technical Manual*, e~~ Detailed analyses are generally appropriate for all area-wide rezonings that include an increase in permitted floor area or changes in height and setback requirements, general large-scale developments, or projects that would result in substantial changes to a historic district or building. Examples include projects that have the potential to obstruct view corridors, compete with icons in the skyline, or make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings. ~~xamples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline.~~ The detailed analysis would describe the urban design and visual resources of the project site and the surrounding area. The analysis would describe the potential changes that could occur to urban design and visual resources in the future with the proposed project, in comparison to the No Action

condition, focusing on the changes that could potentially adversely affect a pedestrian's experience of the area. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

HAZARDOUS MATERIALS

This section will address the potential presence of hazardous materials, petroleum products and/or other environmental conditions in the project site. The EIS will summarize Phase I Environmental Site Assessments (ESAs) as well as any other available hazardous materials studies for the site. The EIS will include recommendations for subsurface testing and/or other activities that would be required either prior to or during construction and/or operation of the project, including a discussion of any necessary remedial or related measures. The EIS will include a general discussion of the health and safety measures that would be implemented during project construction to protect site workers and the surrounding community. The appropriate remediation measures specific to the proposed end use of the site will be provided in the EIS.

WATER AND SEWER INFRASTRUCTURE

The *CEQR Technical Manual* outlines thresholds for analysis of a project's water demand and its generation of wastewater and stormwater. A preliminary water supply and projected water demand analysis is warranted if a project would result in an exceptionally large demand for water (greater than one million gallons per day [gpd]) or would be located in an area that experiences low water pressure. A preliminary wastewater and stormwater infrastructure analysis is warranted if a proposed project exceeds the thresholds outlined in Section 220, "Wastewater and Stormwater Conveyance and Treatment." These thresholds include the location of the proposed project, proposed increases in density, and proposed increases in impervious surfaces. For the proposed project, an analysis of water supply is not warranted since the project would not result in a demand of more than 1 million gpd nor is it located in an area that experiences low water pressure.

However, an analysis of the proposed project's effects on wastewater and stormwater infrastructure is warranted, since the proposed project would exceed the *CEQR Technical Manual* threshold of 400 residential units for combined sewer areas in Brooklyn. Therefore, this chapter will include an analysis of the proposed project's potential effects on wastewater and stormwater infrastructure. This preliminary analysis would include, among other elements, the following:

- The existing sewer system serving the project site will be described based on records obtained from DEP (e.g., sewer network maps, drainage plans). The existing flows to the Newtown Creek Wastewater Resource Recovery Facility (WRRF), which serves the project site, will be obtained for the latest 12-month period, and the average dry weather monthly flow at the WRRF will be presented.
- The existing stormwater drainage system and surfaces (pervious or impervious) on the project site will be described, and the amount of wastewater and stormwater generated on the site will be estimated using rates provided in the *CEQR Technical Manual* and DEP's volume calculation worksheet.
- Any changes to the project site's stormwater drainage system and surface area expected in the future without the proposed project will be described.
- Any changes to the sewer system expected to occur in the future without the proposed project will be described, based on information provided by DEP.

- Sanitary sewage generation for the project site in existing, No Action, and With Action conditions will be estimated. The effects of the incremental demand on the system will be assessed to determine the potential impact on operations of the Newtown Creek WRRF.
- Any changes to the project site's proposed surface area (pervious or impervious) will be described, and runoff coefficients and runoff for each surface type/area will be presented. Volume and peak discharge rates of stormwater from the project site will be determined based on the DEP volume calculation matrix.
- Based on the analyses of future stormwater and wastewater generation, the change in flows and volumes to the sewer system and waterbodies due to the proposed project will be determined.

AKRF will coordinate with DEP during the preparation of the preliminary stormwater and wastewater infrastructure assessment. Based on the results of the preliminary analysis, a detailed assessment may be conducted if warranted. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

TRANSPORTATION

The transportation studies for the proposed project encompass five distinct analysis topics—traffic, transit, pedestrians, street user safety, and parking. The *CEQR Technical Manual* states that further transportation screening assessments may be warranted if a proposed project would result in 50 or more vehicle trips, 50 or more Citywide Ferry Service (CWFS) trips, and/or 200 or more transit/pedestrian trips during any peak hour (a "Level 1" screening). A Level 2 screening assessment involves the distribution and assignment of projected trips to the transportation network and the determination of whether specific locations are expected to experience incremental trips exceeding *CEQR Technical Manual* thresholds. Typically, if the results of this assessment show that during any peak hour the proposed project would result in 50 or more vehicle trips at an intersection, 200 or more subway or rail trips at a station, 50 or more bus riders on a route in one direction, 25 or more CWFS trips in one direction on a single route, 50 or more CWFS passengers at a ferry landing, or 200 or more pedestrian trips on a sidewalk segment, street corner, or crosswalk, further quantified analyses may be warranted to evaluate the potential for significant adverse traffic, transit, pedestrian, and parking impacts.

The findings of these assessments, along with relevant documentation and graphics, will then be summarized in the Transportation chapter of the EIS for review and concurrence by the lead agency and, potentially, involved expert agencies, such as the New York City Department of Transportation (DOT) or Metropolitan Transportation Authority (MTA).

TRAFFIC

In accordance with the *CEQR Technical Manual*, further traffic analyses may be warranted if the proposed project is anticipated to result in an incremental increase of 50 or more peak hour vehicle trips. Further traffic analyses will be conducted in the Transportation chapter of the EIS to identify the potential for any intersections to have significant adverse impacts resulting from the proposed project. If significant adverse impacts are identified in the Transportation chapter, the Mitigation chapter of the EIS will identify transportation improvement measures to mitigate the significant adverse impacts, if available.

TRANSIT

According to the *CEQR Technical Manual*, further transit analyses may be warranted if the proposed project is anticipated to result in an incremental increase of 200 or more peak hour subway/rail trips at a station or 50 or more bus trips in a single direction on a single route, 25 or more CWFS trips in one direction on a single route, or 50 or more CWFS passengers at a ferry landing. Further transit analyses will be conducted to identify the potential for any transit elements (i.e., subway station elements, subway lines, or bus/CWFS routes) to have significant adverse impacts resulting from the proposed project. If significant adverse impacts are identified in the Transportation chapter, the Mitigation chapter of the EIS will identify transportation improvement measures to mitigate the significant adverse impacts.

PEDESTRIANS

Detailed pedestrian analyses may be warranted if the proposed project is anticipated to result in an incremental increase of 200 or more peak hour pedestrian trips. Further pedestrian analyses will be conducted to identify the potential for any pedestrian elements (i.e., sidewalks, corner reservoir areas, or crosswalks) to have significant adverse impacts resulting from the proposed project. If significant adverse impacts are identified, transportation improvement measures to mitigate the significant adverse impacts will be discussed in the Mitigation chapter for the EIS.

STREET USER SAFETY ASSESSMENT

According to the *CEQR Technical Manual*, a pedestrian, bicycle, and vehicular safety assessment is warranted at any intersection that also undergoes detailed traffic or pedestrian analysis, as well as any nearby Vision Zero intersections or corridors identified by DOT. The safety assessments will include an analysis of historic crash data for pedestrian, bicycle, and vehicle crashes; identification of any high pedestrian/bicycle crash locations, as prescribed by the *CEQR Technical Manual*; and an inventory of existing safety treatments and identification of safety countermeasures at high crash locations. The safety assessments will identify any intersections that have the potential for significant adverse safety impacts resulting from the proposed project. If significant impacts are identified, the Mitigation chapter of the EIS will identify transportation improvement measures to mitigate the significant adverse impacts, consistent with the guidelines presented in the *CEQR Technical Manual*.

PARKING

Based on the *CEQR Technical Manual*, a parking study is warranted if detailed traffic analyses are conducted. The parking study will assess the parking demand generated by the proposed project, compare it to on-site and off-site parking resources within ¼-mile of the project site, and identify and quantify any expected parking shortfalls. Since the proposed project is located in an area identified as Downtown Brooklyn Parking Zone 2 in the *CEQR Technical Manual*, the inability of parking resources to accommodate the proposed project's future parking demand is considered a parking shortfall, but is generally not considered a significant adverse parking shortfall due to the availability of alternative modes of transportation.

AIR QUALITY

The number of project-generated trips will likely exceed the *CEQR Technical Manual* carbon monoxide (CO) analysis screening threshold of 160 vehicles in the peak hour at one or more locations within the study area. In addition, the projected number of heavy-duty trucks ~~or~~

equivalent vehicles will likely exceed the applicable fine particulate matter ($PM_{2.5}$) screening thresholds in the ~~2021~~2025 *CEQR Technical Manual*. Therefore, a mobile source screening will be conducted to confirm whether a microscale analysis of $PM_{2.5}$ mobile source emissions at one or affected intersections is necessary. The proposed project would introduce sensitive uses within 200 feet of the elevated section of the BQE; therefore, the effects of this existing roadway on the proposed uses will be analyzed.

It is assumed that the proposed project would utilize electric heating and hot water systems. Therefore, no analysis of the stationary sources associated with the proposed project is necessary. The project site is located near existing industrial land uses; therefore, an assessment of emissions from industrial sources will be performed, as per the *CEQR Technical Manual*. Large and major sources of emissions within 1,000 feet of the study area must also be examined, as described in the *CEQR Technical Manual*.

MOBILE SOURCE ANALYSES

- *Gather existing air quality data*. Collect and summarize existing ambient air quality data for the study area. Specifically, ambient air quality monitoring data published by the New York State Department of Environmental Conservation (DEC) will be compiled for the analysis of existing and future conditions.
- *Determine receptor locations for the microscale analysis.* At intersections that exceed the CEQR mobile source screening thresholds, select critical intersection locations in the study area, representing locations with the highest potential total and incremental pollution impacts, based on data obtained from the proposed project's traffic analysis. At each intersection, multiple receptor locations will be analyzed in accordance with CEQR guidelines.
- *Select dispersion model.* The refined U.S. Environmental Protection Agency (EPA) AERMOD model will be used to predict the maximum change in CO and $PM_{2.5}$ concentrations, consistent with current EPA modeling guidance.
- *Emission calculation methodology and "worst-case" meteorological conditions*. Vehicular cruise and idle emissions for the dispersion modeling will be computed using EPA's MOVES5 model. Compute re-suspended road dust emission factors based on CEQR guidance and the EPA procedure defined in AP–42.
- At each microscale receptor site, calculate for each applicable peak period the maximum 1- and 8-hour average CO concentrations and maximum 24-hour and annual average $PM_{2.5}$ concentrations for No Action and With Action conditions. Concentrations will be determined for up to four peak periods. No field monitoring will be included as part of these analyses.
- An analysis of potential air quality effects on the proposed project from the elevated BQE will be performed. EPA-approved air quality models, including MOVES, and AERMOD, will be used to assess the CO and PM levels at the project site from the traffic along the elevated portion of the BQE near the proposed project. Information regarding the traffic will be based on existing studies regarding traffic volumes along the highway, and projections of traffic growth for the project build year. Five years of recent meteorological data from the nearest National Weather Service Station will be used with concurrent upper air data from Brookhaven, New York.

- *Evaluate results*. Future pollutant levels with and without the proposed project will be compared with the CO NAAQS, and the City's CO and $PM_{2.5}$ *de minimis* guidance criteria, to determine the impacts of the proposed project.
- *Mitigation*. For locations where significant adverse air quality and/or traffic impacts are predicted, identify appropriate mitigation measures.

STATIONARY SOURCE ANALYSES

A review will be performed to determine if there are any processing or manufacturing facilities within 400 feet of the project site. A copy of the DEP air permits for any identified facilities will be requested from the ~~DEP~~ Bureau of Environmental Compliance. A review of DEC permits and registrations will also be performed to identify any federal or state-permitted facilities. A field survey will be performed to identify potential unpermitted processing or manufacturing facilities within 400 feet of the project site. If any sources are identified, an analysis would be performed using the EPA AERMOD model. Predicted worst-case impacts on the project will be compared with the short-term guideline concentrations (SGC) and annual guideline concentrations (AGC) reported in the DEC *DAR-1 AGC/SGC Tables* guidance document to determine the potential for significant impacts.

There are several potential large or major emission sources in the vicinity of the project site. Further review will be performed to determine if any of these facilities have emission sources within 1,000 feet of the project site. If any facilities are identified, a detailed analysis would be performed. Predicted criteria pollutant concentrations would be predicted using the AERMOD model and compared with NAAQS for NO_2, sulfur dioxide (if fuel oil No. 2 is used).

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

According to the *CEQR Technical Manual*, a greenhouse gas (GHG) consistency assessment is appropriate for projects being reviewed in an EIS that would result in development of 350,000 square feet or greater. Therefore, GHG emissions generated by the proposed project will be quantified and an assessment of consistency with the City's established GHG reduction goal will be prepared. Emissions will be estimated for the analysis year and reported as carbon dioxide equivalent (CO_2e) metric tons per year. GHG emissions other than carbon dioxide (CO_2) will be included if they would account for a substantial portion of overall emissions, adjusted to account for the global warming potential.

Relevant measures to reduce energy consumption and GHG emissions that could be incorporated into the proposed project will be discussed, and the potential for those measures to reduce GHG emissions from the proposed project will be assessed to the extent practicable.

Since the project site is located in a flood hazard zone, the potential impacts of climate change on the proposed project will be evaluated. The discussion will focus on sea level rise and changes in storm frequency projected to result from global climate change, projected changes in precipitation levels, and projected changes in the duration and frequency of heat waves. The potential future impact of these changes on project infrastructure and uses will also be discussed.

The analysis will consist of the following subtasks:

- Direct Emissions—GHG emissions from on-site boilers used for heat and hot water, natural gas used for cooking, and fuel used for on-site electricity generation, if any, will be quantified.

Emissions will be based on project-specific information regarding the project's expected fuel use or, if estimates cannot be provided, on carbon intensity factors specified in the *CEQR Technical Manual*.

- Indirect Emissions—GHG emissions from purchased electricity and/or steam generated off-site and consumed on-site during the project's operation will be estimated. Emissions will be based on project-specific information regarding the project's expected fuel use or, if estimates cannot be provided, on carbon intensity factors specified in the *CEQR Technical Manual*.
- Indirect Mobile Source Emissions—GHG emissions from vehicle trips to and from the project site will be quantified using trip distances and vehicle emission factors provided in the *CEQR Technical Manual*. To the extent that other substantial traffic changes would be caused by the project due to rerouting, emissions associated with these changes would be included as well.
- Emissions from project construction and emissions associated with the extraction or production of construction materials will be quantified directly. Opportunities for reducing GHG emissions associated with construction will be considered.
- Design features and operational measures to reduce the proposed project's energy use and GHG emissions will be discussed.
- Consistency with the City and State's GHG reduction goal will be assessed. While the City's overall goal is to achieve a carbon neutral status by 2050, individual project consistency is evaluated based on building energy efficiency, proximity to transit, on-site renewable power and distributed generation, efforts to reduce on-road vehicle trips and/or to reduce the carbon fuel intensity or improve vehicle efficiency for project-generated vehicle trips, and other efforts to reduce the project's carbon footprint. Furthermore, the project's emissions will be assessed to demonstrate consistency with the State's GHG emission reduction strategies to achieve the statewide emission limits through policy recommendations as described in the Climate Action Council's Scoping Plan.
- The potential effects of climate change on the project site will be evaluated based on the best available information. The evaluation will focus on potential future climate conditions (including sea and storm levels, precipitation levels, and the frequency and duration of heat waves) and the interaction with project infrastructure and uses. The discussion will focus on early integration of climate change considerations into the project design to allow for uncertainties regarding future environmental conditions resulting from climate change.

NOISE

The *CEQR Technical Manual* requires that the noise chapter address whether the proposed project would result in a significant increase in noise levels (particularly at sensitive land uses such as residences) and what level of building attenuation is necessary to provide acceptable interior noise levels. It is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and that no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed. Consequently, the noise analysis will examine the potential increases in noise level at nearby noise receptors resulting from traffic associated with the proposed project and the level of building attenuation necessary to meet CEQR interior noise level requirements.

Specifically, the noise analysis will include the following tasks:

- Select appropriate noise descriptors. Appropriate noise descriptors to describe the existing noise environment will be selected. Based upon CEQR criteria, the noise analysis would

examine the 1-hour equivalent ($L_{eq(1)}$) and the L_{10} noise levels. If existing noise levels at any receptors included in the analysis are dominated by a source other than traffic, other appropriate noise descriptors would be considered according to *CEQR Technical Manual* guidance.

- Select receptor locations. Receptor sites analyzed will include locations where noise exposure levels from either existing noise sources (e.g., vehicular traffic) or future noise sources could adversely affect new residential, school, and other sensitive uses associated with the project as well as any locations where the proposed project would have the potential to result in significant noise level increases.
- At each of the receptor locations, perform 20-minute measurements at each receptor location during each of three weekday peak time periods. The L_{eq}, L_1, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} noise descriptors will be recorded.
- Data analysis and reduction. The results of the noise measurement program will be analyzed and tabulated.
- Determine future noise levels without and with the proposed project. At each of the receptor locations identified above, determine noise levels without and with the proposed project using existing noise levels, acoustical fundamentals, traffic analysis results, and mathematical models. Playground noise will be calculated in accordance with Chapter 19, Section 333 of the *CEQR Technical Manual*.
- Compare noise levels with standards, guidelines, and other impact evaluation criteria. Compare existing noise levels and future noise levels, both with and without the proposed project, with various noise standards, guidelines, and other appropriate noise criteria.
- Determine the level of attenuation necessary to satisfy CEQR criteria. The level of building attenuation necessary to satisfy CEQR requirements is a function of exterior noise levels and will be determined. Measured values will be compared to appropriate standards and guideline levels. As necessary, recommendations regarding general noise attenuation measures needed for the proposed project to achieve compliance with standards and guideline levels will be made.

The methodology for the noise analyses will be ~~summarized in a memorandum for~~ reviewed and approved ~~and approval~~ by the lead agency and involved agencies.

PUBLIC HEALTH

According to the *CEQR Technical Manual*, a public health analysis is not warranted if a project does not result in a significant unmitigated adverse impact in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If an unmitigated significant adverse impact is identified in the relevant technical areas of the EIS, a public health analysis will be performed.

NEIGHBORHOOD CHARACTER

Neighborhood character is determined by a number of factors, such as land use, community facilities and services, open space, shadows, urban design and~~,~~ visual resources, historic and cultural resources, socioeconomic conditions, ~~traffic~~transportation, and noise. Methodologies outlined in the *CEQR Technical Manual* will be used to provide an assessment of neighborhood character. This chapter will include the following tasks:

- Based on other technical analyses, the chapter will provide a description of the predominant factors that contribute to defining the character of the neighborhood surrounding the project site.
- Based on planned development projects, public policy initiatives, and planned public improvements, the chapter will provide a summary of changes that can be expected in the character of the area in the future without the proposed project.
- The chapter will provide an assessment of the proposed project's effect on neighborhood character using the other pertinent analyses (such as land use, community facilities and services, open space, shadows, urban design and visual resources, historic and cultural resources, socioeconomic conditions, transportation, and noise).

CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. The construction impact assessment will evaluate the duration and severity of the disruption and inconvenience to nearby area. This assessment will describe the construction schedule and logistics, discuss anticipated on-site activities, provide estimates of construction workers and truck deliveries. ~~It is assumed that the project team will provide the necessary construction phasing information and logistics documentation, as well as construction equipment, materials, and personnel projections.~~

Because the overall construction duration for the proposed project is anticipated to be long-term (i.e., greater than two years), built out over construction ~~phases~~stages, and the activities would occur in proximity to sensitive receptors (i.e., schools, residences, and publicly accessible open spaces including ballcourts and playgrounds), the proposed project could have substantial and extended construction effects. Construction projects near sensitive receptors locations with a long construction duration will typically require an assessment of the potential impacts of construction activities on transportation, air quality, and noise.

The proposed project entails the construction of four new buildings. The construction sequencing for the proposed buildings would be continuous such that construction would begin on the mixed-use residential and community facility building on the west side of Nassau Street and a mixed-use retail and school building on the corner of Nassau and Navy Streets. Upon completion, the school~~s~~ would be relocated into the new building at the corner of Nassau and Navy Streets and construction of the mixed-use retail and residential building at the intersection of Navy and Concord Streets, and a residential building on Concord Street adjacent to Golconda Playground would commence. The construction analysis will assume that the schools in the new building would be operational during construction of the remaining two buildings.

Technical areas to be assessed include the following:

- ***Transportation Systems.*** This assessment will consider losses in lanes, sidewalks, off-street parking, and effects on other transportation services (i.e., transit and pedestrian circulation) during construction and identify the increase in vehicle trips from construction workers and trucks and pedestrian trips from construction workers. Issues concerning construction worker parking, truck staging, and potential conflicts with school buses will also be addressed. The steps identified in the "Transportation" section above will be followed to present this transportation screening assessment and detailed analyses. In addition to the steps in the screening assessment, a detailed analysis will be undertaken if the project's construction activities require closing, narrowing, or otherwise impeding moving lanes, roadways, key

pedestrian facilities (e.g., sidewalks, crosswalks, corners/corner reservoirs), parking lanes and/or parking spaces in on-site or nearby parking lots and garages, bicycle routes and facilities, bus lanes or routes, or access points to transit in such a manner that determines that detailed analyses are warranted. The findings of these assessments, along with relevant documentation and graphics, will then be summarized in the Construction chapter of the EIS. If detailed transportation analyses are conducted and significant impacts are identified in the Construction chapter, the Mitigation chapter of the EIS will identify construction period transportation improvement measures to mitigate the significant adverse impacts, consistent with the guidelines presented in the *CEQR Technical Manual*.

~~*Detailed Construction Transportation Analysis*~~

~~In the detailed construction transportation analysis, existing traffic and pedestrian data will be collected for the construction peak hours to establish existing traffic and pedestrian service levels. The estimated peak hour trips associated with the construction of the proposed project during peak construction will then be overlaid onto the future baseline condition traffic and pedestrian network and compared to the impact criteria outlined in the *CEQR Technical Manual* to determine the potential for significant adverse traffic and pedestrian impacts. If significant adverse impacts are found, mitigation measures will be developed.~~

- ***Air Quality.*** The construction air quality impact section will contain a detailed dispersion analysis of construction sources to determine the potential for air quality impacts on sensitive receptor locations. Air pollutant sources would include combustion exhaust associated with non-road construction engines (e.g., cranes, excavators) and trucks operating on-site, construction-generated traffic on local roadways, as well as onsite activities (e.g., excavation, demolition) that generate dust. The pollutants of concern include carbon monoxide (CO), particulate matter (PM), and nitrogen dioxide (NO_2). The potential for significant impacts will be determined by a comparison of the model predicted concentrations to the National Ambient Air Quality Standards (NAAQS), or by comparison of the predicted increase in concentrations to applicable interim guidance thresholds. The air quality analysis will also include a discussion of the strategies to reduce project related air pollutant emissions associated with construction activities. The methodology for the construction air quality analysis will be reviewed and approved by the lead agency.
- ***Noise and Vibration.*** Because of the anticipated lengthy construction duration of the proposed project and due to the proposed project's proximity to sensitive receptor locations (such as the nearby residences and potentially completed and occupied portions of the proposed project), it may have the potential for substantial and extended construction noise effects. Large-scale developments near sensitive receptors locations will require a quantitative assessment of the potential impacts of construction activities on noise.
- In the detailed construction noise analysis, existing noise levels will be determined by noise measurements performed at at-grade receptor locations. During the most representative worst-case time periods, noise levels due to construction activities at each sensitive receptor will be predicted. Based on the results of the construction noise analysis, if necessary, the feasibility, practicability, and effectiveness of implementing measures to mitigate significant construction noise impacts will be examined. The methodology for the construction noise analysis will be reviewed and approved by the lead agency.
- Construction activities have the potential to result in vibration levels that may result in structural or architectural damage, and/or annoyance or interference with vibration-sensitive

activities. A construction vibration assessment will be performed. This assessment will determine critical distances at which various pieces of equipment may cause damage or annoyance to nearby buildings and subway lines based on the type of equipment, the building construction, and applicable vibration level criteria. Should it be necessary for certain construction equipment to be located closer to a building than its critical distance, vibration mitigation options will be proposed.

- ***Other Technical Areas.*** As appropriate, discuss other areas of environmental assessment for potential construction-related impacts, including but not limited to historic and cultural resources, hazardous materials, open space, socioeconomic conditions, community facilities, and land use and neighborhood character.

EFFECTS ON DISADVANTAGED COMMUNITIES

This assessment will be prepared pursuant to Section 8-0109(2)(k) of the New York State Environmental Conservation Law (known as the "Environmental Justice Siting Law" or "EJSL"), which requires that an EIS include a statement of the effects of a proposed project on disadvantaged communities (DACs), including whether the action may cause or increase a disproportionate pollution burden on a DAC. On January 29, 2025, the DEC proposed amendments to the SEQRA regulations codified at 6 NYCRR Part 617 to implement the SEQRA-related provisions of the ~~Environmental Justice Siting Law~~EJSL. In May 2026, DEC finalized SEQRA regulations to incorporate the SEQRA-related requirements of the EJSL. The 2025 *CEQR Technical Manual* ~~does not~~ includes guidance for this assessment. The assessment will be prepared following relevant guidance from DEC and the *CEQR Technical Manual*. Following DEC and *CEQR Technical Manual* guidance, the assessment will establish the study area, identify DACs in the study area along with their burdens and vulnerabilities, identify potential effects on DACs, and determine whether potential adverse impacts are likely to result in a disproportionate pollution burden on a DAC.

MITIGATION MEASURES

Where significant impacts have been identified in the analyses discussed above, measures will be described to mitigate those impacts. If the EIS identifies any significant impacts for which no mitigation can be implemented, they will be presented as unavoidable adverse impacts.

ALTERNATIVES

The purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the proposed project. The specific alternatives to be analyzed are typically finalized as project impacts become clarified during the preparation of the EIS. A No Action Alternative, as required under SEQRA, will be considered in the EIS. If significant adverse impacts are identified in the EIS, a No Unmitigated Adverse Impacts Alternative will be included to describe the modifications to the project needed to avoid any such impacts. For technical areas where impacts have been identified, the alternatives analysis will determine whether these impacts would still occur under

each alternative. The analysis of each alternative will be qualitative, except where impacts from the proposed actions have been identified.

EIS SUMMARY CHAPTERS

EXECUTIVE SUMMARY

Once the EIS technical sections have been prepared, a concise executive summary will be drafted. The executive summary will use relevant material from the body of the EIS to describe the proposed project, environmental impacts, measures to mitigate those impacts, and alternatives to the proposed project.

UNAVOIDABLE ADVERSE IMPACTS

Those impacts, if any, which could not be avoided and could not be practicably mitigated will be described in this chapter.

GROWTH-INDUCING ASPECTS OF THE PROPOSED PROJECT

This chapter will focus on whether the proposed project would have the potential to induce new development within the surrounding area.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

This chapter focuses on those resources, such as energy and construction materials, which would be irretrievably committed should the proposed project be built. ✴

Appendix 1:
Response to Comments on the
Draft Scope of Work (DSOW)

Appendix 1: Response to Comments on the DSOW

A. INTRODUCTION

This appendix to the Final Scope of Work (FSOW) summarizes and responds to substantive comments received during the public comment period for the Draft Scope of Work (DSOW) issued on December 22, 2025, for the Draft Environmental Impact Statement (DEIS) for the 240 Nassau Street Project.

The New York State Environmental Quality Review Act (SEQRA) and City Environmental Quality Review (CEQR) require a public scoping meeting as part of the environmental review process. Accordingly, a public scoping meeting on the DSOW was held remotely on January 27, 2026. The comment period remained open until the end of day on February 6, 2026.

Section B lists the organizations and individuals who provided comments relevant to the DSOW. Section C contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the DSOW. Where more than one commenter expressed similar views, those comments have been grouped and addressed together. All written comments are included in Appendix 2, "Written Comments Received on the DSOW."

Where relevant, in response to comments on the DSOW, changes have been made and are shown with double underlines in the FSOW.

B. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DSOW[1]

ORGANIZATIONS AND BUSINESSES

1. Rosamond Fletcher, Executive Director, Fort Greene Park Conservancy, letter dated February 5, 2026 (Fletcher_FGPC_001)
2. Rene Scotland, Founding Member, Friends of Commodore Barry Park, letter dated February 6, 2026 (Scotland_FCBP_002)
3. Irawati Anand, Real Estate and Planning Manager, Downtown Brooklyn Partnership, oral comments delivered on January 27, 2026 (Anand_DBP_003)
4. Meghan Dunn, Superintendent, District 13, oral comments delivered on January 27, 2026 (Dunn_D13_004)

[1] Citations in parentheses refer to internal tracking references.

5. Kalvis, Mikelsteins, Vice President of Operations and Planning, DUMBO BID, oral comments delivered on January 27, 2026 (Mikelsteins_DBID_006)
6. Everbell Bishop, Principal, P.S. 287, oral comments delivered on January 27, 2026 (Bishop_PS287_007)
7. Mark V.C. Taylor, Reverend, The Church of the Open Door, oral comments delivered on January 27, 2026 (Taylor_COD_008)

GENERAL PUBLIC

8. Samantha Johnson, oral comments delivered on January 27, 2026 (Johnson_005)

C. COMMENTS AND RESPONSES

PUBLIC ENGAGEMENT

Comment 1: Alloy has engaged the community through a genuine public-private partnership. Bringing in local partners, seeking input, and committing to address real neighborhood needs. (Anand_DBP_003)

Response 1: Comment noted.

Comment 2: I am speaking on behalf of the community members who have not really been included in this process. It has been since 2023, where the Farragut-Fort Greene Coalition has been adamantly arguing about true transparency and accountability for any project that was going to be developed on this site. I will give credit to the current developers who have been working with a smaller team to speak about the issues that they felt [would be most important to] highlight. (Johnson_005)

There are several parts of the community that I'm not sure were informed about tonight. Perhaps you've heard from someone in the coalition. But the tenant association is a part of the Farragut-Fort Greene Coalition and there is a group led by Dorian Mueller, that's part of the coalition. And there are some other churches in the coalition. We are concerned about how the community was notified and informed of the changes regarding PS287. (Taylor_COD_008)

Response 2: Alloy has led a comprehensive community engagement process, holding more than 100 meetings with community organizations, nearby NYCHA tenant associations, elected officials, and other neighbors to discuss the future of 240 Nassau Street. Alloy has also established a community liaison role, formed a community advisory group, hosted open houses, and conducted workshops to ensure the vision for the site reflects community needs. Additionally, the SEQRA/CEQR and Uniform Land Use Review

Procedure (ULURP) processes provide for public review, including the hearing that occurred on the DSOW in December 2025 and upcoming hearings at the City Planning Commission on the ULURP application (held in conjunction with the DEIS hearing), and hearings on the land use application before Community Board 2, the Borough President and City Council.

PROJECT DESCRIPTION

PURPOSE AND NEED

Comment 3: I'm speaking on behalf of [Downtown Brooklyn Partnership] to express strong support of the proposed redevelopment at 50 Navy Street and 240 Nassau Street. This area urgently needs transformative investments. In recent years, it has lost a daycare, a community center, and the Boys and Girls Club. The adjacent public housing needs hundreds of millions in repairs. No new school has been built here in over 20 years, and the existing school at this site needs upgrading. At a time when the city desperately needs housing, this project steps up in a major way. It also creates 4,000 jobs and activates the ground floor with retail that will support the local economy. This level of comprehensive benefit in a single development is rare, and exactly what this neighborhood and the greater downtown Brooklyn region needs. (Anand_DBP_003)

Response 3: Comment noted. As discussed in the DSOW, the Proposed Actions would address the need for a modern public school facility, housing, community amenities and publicly accessible open space.

Comment 4: I am the Superintendent for District 13. And I'm very grateful to be able to speak about this opportunity for the proposed new building for P.S. 287, the Dr. Bailey K. Ashford School, which is a pre-K through 5th grade, IB-accredited school currently located at 50 Navy Street. A new facility for P.S. 287 is more than just a construction progress. It's an investment in our children, our families, and the long-term strength of District 13. A modernized building will allow us to expand programming, support student growth, and create spaces that reflect the kind of learning that we champion throughout District 13. (Dunn_D13_004)

Response 4: Comment noted.

Comment 5: This development poses an opportunity to greatly improve the quality of life for those who would occupy the new development and the surrounding community. The redevelopment of this site could address the numerous needs for the local community, additional housing, a redeveloped school and community center, and revamped public spaces. (Mikelsteins_DBID_006)

Response 5: Comment noted.

Affordable Housing

Comment 6: As a person who's lived in Fort Greene for over 25 plus years, and this development being adjacent to Farragut Houses, I think it needs to be way more intentional about the community members in which it's going to serve. I am grateful that there's going to be conversations with the New York City Housing Authority (NYCHA) about intentional placement and selection of these units to the community members. (Johnson_005)

Response 6: Comment noted.

Comment 7: We are raising the question of whether or not the affordability is enough so that people who might want to apply from public housing can be informed. And we would want 40 percent affordable [in both buildings] to make it more affordable to people who live in public housing. (Taylor_COD_008)

Response 7: As described in the DSOW, the Proposed Project would include approximately 301 affordable units (approximately 20 percent of the total units).

LAND USE, ZONING, AND PUBLIC POLICY

Waterfront Revitalization Program

Comment 8: How is this project going to impact the flooding that happened just a couple of years ago, where the area in which this building will be built has a moderate to a high flood [risk]. (Johnson_005)

Response 8: The Proposed Actions will be assessed relative to the policies of the Waterfront Revitalization Program, which considers the exposure of the Proposed Project to current and future flood risk through 2100, identifies features of the Proposed Project most vulnerable to sea level rise and coastal flooding, discusses the measures to address current and future coastal flooding at these sites, and considers the potential impacts of the Proposed Actions

on flooding risk to adjacent properties. This includes consideration of stormwater management measures and vegetated spaces that would minimize the potential effects to surrounding areas from stormwater runoff.

New buildings within the current 1 percent annual chance floodplain would be built in accordance with Appendix G of the New York City Building Code "Flood Resistant Construction," which regulates construction and substantial building improvements in flood hazard areas. Appendix G requirements for construction in the special flood hazard area dictate that enclosures below the design flood elevation (DFE) are wet floodproofed, which includes sealing walls and foundations, installing watertight shields or panels at windows and doors, and installing temporary flood barriers, stairs, or ramps. Additionally, uses must be limited to vehicle parking, storage, or building access. Dry floodproofing, such as water-resistance finishes and building materials or deployable flood barriers, is required for project features in the current or projected floodplain.

Future developments would be required to have finished floor elevations at or above the most restrictive DFE in compliance with the New York City Building Code. Although specific building designs are not yet proposed, any necessary wet or dry floodproofing measures would be incorporated and required for construction bids. Any residential dwelling units and critical infrastructure in buildings proposed within the 1 percent annual chance floodplain would be required to be elevated above the DFE in accordance with Appendix G. Because the Proposed Project would be constructed on City-owned land, the proposed development would be required to comply with the Climate Resiliency Design Guidelines (CRDG), which provide a framework for going above and beyond Appendix G standards and are informed by both historic climate data and forward-looking climate data. Some of the proposed design features these guidelines list that go beyond Appendix G requirements include deployable flood barriers, protection of MEP equipment, protection of underground utilities from water damage, and utility redundancy. Any projects receiving funding from the New York City Housing and Preservation Department (HPD) are required to meet the agency's resiliency guidelines, which incorporate CRDG definitions and climate projections, and require that new construction or substantial improvements be floodproofed up to the projected 2080s DFE.

OPEN SPACE

Comment 9: We request that the City incorporate Fort Greene Park Conservancy's (FGPC) feedback to ensure the DEIS assesses the true impact of the proposed development on the area's parks and proposes adequate mitigation. (Fletcher_FGPC_001)

Response 9: The open space analysis contained in the EIS is based on *CEQR Technical Manual* methodologies and has been reviewed by the lead agency, ECF, and the New York City Department of Parks and Recreation (NYC Parks), which is an involved agency in the SEQRA review. The analysis in the EIS will consider the potential of the Proposed Actions to result in significant adverse impacts, including direct (physical) effects to open spaces and indirect effects, such as the added demand placed on study area open spaces from the new project-generated residential and non-residential populations. The public, including FGPC, will have an opportunity to comment on the open space analysis in the DEIS, and any identified mitigation to address significant adverse impacts, at a public hearing to be held on the DEIS at a later date.

Comment 10: The environmental review should factor in residents generated by 395 Flatbush Extension project and other spot rezonings into its OSR [open space ratio] assessment, including the TF Cornerstone/The Brooklyn Hospital Center project, which we understand is imminent. Together, these three projects add ~14,000 people and their dogs to the area. (Fletcher_FGPC_001)

Response 10: The open space analysis in the DEIS will account for existing and known planned developments in the open space study area in accordance with the 2025 *CEQR Technical Manual*. As described in the DSOW, publicly accessible open spaces within an approximate ½-mile of the Project Site will be identified. The study area is based on an approximate half mile radius that is modified to include census tracts with at least 50 percent of their area within the ½-mile boundary from the Project Site, and the demand placed on open spaces from these developments.

Comment 11: We are concerned about the impact of the 240 Nassau/50 Navy Streets project on the use and conditions of Commodore Barry Park. There has been a steady increase in park usage over the years and the overuse of the park stems mainly from expanding residential density and heavier park reliance, conditions that will grow further once the 240 Nassau/50 Navy Streets project is

completed. Commodore Barry Park is currently understaffed, and we are concerned about how increased foot traffic and activity associated with the completed project will affect maintenance, safety, and the overall condition of the park. (Scotland_FCBP_002)

Response 11: As described in the DSOW, the DEIS will include an assessment of open spaces, which includes Commodore Barry Park. The DEIS will identify the active and passive elements of these open spaces (active versus passive use) and describe the condition and general utilization of the open spaces. In accordance with CEQR guidance, the chapter will project conditions in the future with and without the Proposed Actions and take into account quantitative and qualitative considerations of open space to assess the potential for a significant adverse open space impact to result from the Proposed Project.

TRANSPORTATION

Comment 12: We are concerned about environmental impact. Parking is at a crisis level in the neighborhood. (Taylor_COD_008)

Response 12: As described in the DSOW, a parking study is warranted if detailed traffic analyses are conducted. The Transportation chapter of the EIS will follow the transportation screening methodology prescribed in the *CEQR Technical Manual*, and the transportation screening methodology will be subject to review and approval by New York City Department of Transportation. It is anticipated that traffic will be analyzed in detail to identify the potential for the Proposed Project to result in significant adverse traffic impacts, and identify mitigation, where feasible. A detailed analysis of parking will also be included in the Transportation chapter of the DEIS.

PUBLIC HEALTH

Comment 13: How is this project going to impact the asthma rates in the neighborhood? (Johnson_005)

Response 13: The DEIS will not consider the potential impact on asthma rates in the neighborhood, but as discussed in the DSOW, the DEIS will assess the potential for significant adverse air quality impacts to result from project-generated mobile and stationary sources. In the event a significant impact on air quality is predicted, an evaluation

of the potential for impacts to public health would be presented in the DEIS.

Comment 14: The rates of pollution in the community, the rates of lead poisoning are very high, being that we are already around the highways. (Taylor_COD_008)

Response 14: Comment noted. The potential for lead exposure will be evaluated in the Hazardous Materials chapter of the DEIS. The evaluation will be based on Phase I Environmental Site Assessments conducted at the existing buildings at 240 Nassau Street and 50 Navy Street. As described in the DSOW, the DEIS will consider the potential air quality and noise effects on the Proposed Project from vehicles on the elevated Brooklyn-Queens Expressway.

CONSTRUCTION

Comment 15: We're very concerned about the environmental impact of 3 to 7 years of construction. The church is right across the street [from the proposed] buildings and the entire complex. We're very concerned about that. (Taylor_COD_008)

Response 15: As described in the DSOW, the construction analysis will evaluate the duration and severity of the disruption and inconvenience to nearby area. The DEIS will provide details on the Proposed Project's anticipated construction schedule and phasing of activities likely to occur during construction, the type of equipment that is likely to be used, and preliminary construction logistics (e.g., site access points and potential staging area locations). Based on this information, potential impacts on specific areas of concern, including transportation, air quality, noise and vibration, and hazardous materials from construction activities will be disclosed, if identified. The DEIS will also identify measures that would avoid, minimize, and/or mitigate any identified potential significant adverse construction-related impacts.

MITIGATION

Comment 16: To proactively address open space issues, the FGPC has engaged consultants to conduct a feasibility study on potential structures for a long-term Maintenance & Operations Fund, to be established as mitigation of the impacts of upcoming development projects. The consultants recommended a self-levy district, in the form of an Open Space Improvement District (similar in structure but different

in purpose to a Business Improvement District or BID), as the most effective, predictable, and viable mechanism for sustained annual operations funding. The developers of 395 Flatbush have agreed to an annual maintenance and operations contribution, based on the cost to mitigate the additional residents per the current NYC Parks staff to population ratio and the National Parks Association benchmark. (Fletcher_FGPC_001)

Response 16: The DEIS will propose mitigation measures for any significant adverse open space impact identified as a result of the Proposed Actions.

GENERAL SUPPORT

Comment 17: I would like to voice our strong support for this development. Alloy has a proven track record of thoughtful, aesthetic, and community-focused design in Brooklyn. And the DUMBO BID is excited by this proposal. (Mikelsteins_DBID_006)

Response 17: Comment noted.

✷

Appendix 2:
DSOW Comments and Transcripts

FORT GREENE PARK CONSERVANCY

Attn: Jennifer Maldonado
New York City Educational Construction Fund
25-01 Jackson Avenue
Long Island City, New York 11101
jmaldonado10@schools.nyc.gov

February 5, 2026

Thank you to NYC Educational Construction Fund for organizing the recent scoping meeting and gathering testimony for the Draft Environmental Impact Statement (DEIS) for the 240 Nassau / 50 Navy project (the "Project"). I joined the session via phone to hear more about the development, and we've since met with Alloy regarding the Project. We commend Alloy on its extensive engagement with the community and its thoughtful design and plans. The Project will benefit the community in a multitude of ways.

My name is Rosamond Fletcher and I'm the Executive Director of the Fort Greene Park Conservancy. For nearly 25 years, we have partnered closely with NYC Parks as the primary steward of Fort Greene Park. We have grown our capacity and budget in recent years—now at $1.7 million—to respond to intensive park use, much of which stems from new residents living in Downtown Brooklyn since the 2004 rezoning.

We have also partnered closely with Friends of Commodore Barry Park (FoCBP) for the last six years on programmatic initiatives, funding, and parks advocacy to advance their efforts and issues of equity within Fort Greene. FoCBP is submitting separate testimony; Our testimony reinforces their particular concerns/interests and provides broader context on a planning effort we are spearheading in the neighborhood to address the significant and cumulative open space impacts of current spot rezonings.

I'm dividing our testimony into three parts:

I. FORT GREENE SURROUNDING CONTEXT
II. OPEN SPACE IMPACTS
III. MITIGATION: FORT GREENE OPEN SPACE IMPROVEMENT DISTRICT

I. FORT GREENE SURROUNDING CONTEXT

The neighborhood of Fort Greene includes two ample parks—both within a half-mile of the Project site—as well as a number of playgrounds and greenspaces that provide for a range of use by immediate and adjacent communities. At 30 acres, Fort Greene Park is a substantial historic park, filled with amenities: ample lawns for picnicking, sun bathing and off-leash with your dog, tennis and basketball courts, two playgrounds. At 10 acres, Commodore Barry Park is a significant historic park (the 1st in Brooklyn), with even more amenities: a pool, baseball and football fields, basketball and handball courts, playgrounds, and more. Both are used by residents of Whitman, Ingersoll, and Farragut Houses and residents of recent Downtown Brooklyn developments. If you're a resident and are walking your dog or pushing your kid in a stroller, the likelihood that you'll use either Fort Greene Park or Commodore Barry Park is high.

In fact, Fort Greene Park now has 250,000 unique users per year based on data from Placer AI. These numbers far exceed the full population of Fort Greene, which is just over 30,000. **Our analysis shows that park use/acre in Fort Greene Park is actually double that of Prospect Park, and nearly the same use per acre of Central Park, the most visited park in the United States. FoCBP and Resident Association**

85 South Oxford St,
Brooklyn, New York 11217
info@fortgreenepark.org
fortgreenepark.org

leaders at NYCHA developments have also observed an uptick in use—people and dogs—at Commodore Barry Park.

The heavy use of Fort Greene Park and Commodore Barry Park stems from the 2004 rezoning of Downtown Brooklyn, which resulted in nearly **30,000 units of housing to date when only 979 units were anticipated.** This volume of housing was offset by **only one new 1-acre park.**

As the population has rapidly increased in the area, the City's budget for parks has not kept pace. Maintenance and operations staffing has actually decreased and is unlikely to get better given financial challenges the City faces.

So, while we appreciate the additional open space that the Project has planned, we respectfully request that the City incorporate our feedback to ensure the DEIS assesses the true impact of the proposed development on the area's parks and proposes adequate mitigation.

II. OPEN SPACE IMPACTS

The impact of the proposed Project includes **unmitigated additional use** on Commodore Barry Park, and to an extent, Fort Greene Park. The Draft Scope of Work for the EIS outlines an analysis of the impact of the additional population from the Project on open space.

Our rough calculation, per CEQR of the .5 mile study area, yielded an Open Space Ratio that was under 50% of the guideline. These circumstances demand a detailed analysis for this Project. Per CEQR, "Detailed analysis of open space effects on residents is generally unnecessary if the open space ratio decreases by less than 1 percent. **However, the existing open space ratio may be so low that even an open space ratio change of less than 1 percent may result in potential significant open space impacts. In that case, the potential for open space impacts should be further assessed."**

Another spot rezoning in the area, 395 Flatbush Ext, which is currently in ULURP, yields **an OSR that is just 24% of the guideline**. 240 Nassau and its environmental review should factor in this and other spot rezonings into its OSR assessment, including the TF Cornerstone/The Brooklyn Hospital Center project, which we understand is imminent. Together, these three projects add ~14,000 people and their dogs to the area.

These extremely deficient OSRs not only impact access to open space and active recreational opportunities, but also green space, threatening tree health and degrading lawn/field conditions. These impacts directly impact the health of the community, including the designated Disadvantaged Communities (DACs) in the area.

III. MITIGATION: FORT GREENE OPEN SPACE IMPROVEMENT DISTRICT

To proactively address these open space issues, the Conservancy hired a team of expert consultants to conduct a feasibility study on potential structures for a long-term M&O (Maintenance & Operations) Fund, to be established as mitigation of the impacts of upcoming development projects. The team (Blaise Backer, Former Deputy Commissioner, NYC SBS Neighborhood Development; Tim Tompkins, Founding Director, Partnerships for Parks; and Meredith Phillips Almeida, Former Executive Director, Myrtle Avenue Brooklyn Partnership) recommended a self-levy district, in the

85 South Oxford St,
Brooklyn, New York 11217
info@fortgreenepark.org
fortgreenepark.org

form of an Open Space Improvement District (similar in structure but different in purpose to a Business Improvement District or BID), as the most effective, predictable, and viable mechanism for sustained annual operations funding.

Subsequently, Carter Ledyard Milburn, our representation on the matter, confirmed the legal basis for establishing an Open Space Improvement District using NYS and NYC BID laws. The Conservancy's advocacy to date, relative to the 395 Flatbush project and the creation of a maintenance and operations fund has resulted in:

- September 17, 2025 - **CB2 voted to support 395 Flatbush Ext with the condition that the developers "Provide a meaningful financial contribution to the Fort Greene Park Conservancy for ongoing maintenance and operations."**

- October 8, 2025 - FGPC Board voted to proceed to establish an M&O Fund, prioritizing a Park/Open Space District structure based on BID legislation as an equitable model that would support more parks in the area.

- November 17, 2025 - the **Brooklyn Borough President Reynoso affirmed our request and CB2's condition, asking the developers to "Adequately invest in Fort Greene Park's operations and maintenance given the anticipated increase in use resulting from additional new residents."**

The developers of 395 Flatbush have agreed to an annual maintenance and operations contribution, based on the cost to mitigate the additional residents per the current NYC Parks staff to population ratio and the National Parks Association benchmark, and to advocate for an Open Space Improvement District via participation on the Steering Committee we're convening.

Council Member Hudson is advancing our recommendations for 395 Flatbush and has agreed to join the Steering Committee, along with the Borough President.

We've invited Alloy to participate in the Steering Committee and look forward to continuing our conversations with the development team.

With appreciation,



Rosamond Fletcher
Executive Director

85 South Oxford St,
Brooklyn, New York 11217
info@fortgreenepark.org
fortgreenepark.org

FRIENDS OF COMMODORE BARRY PARK

C/O City Parks Foundation
830 Fifth Avenue
New York, NY 10065

February 6, 2026

BY EMAIL: jmaldonado10@schools.nyc.gov

New York City Educational Construction Fund
25-01 Jackson Avenue
Long Island City, New York 11101
Attn: Jennifer Maldonado

Dear Ms. Maldonado,

I am writing on behalf of Friends of Commodore Barry Park to share our concerns regarding the anticipated impact of the **240 Nassau/50 Navy Streets** project will have on Commodore Barry Park and its surrounding community.

I am a Founding Member of Friends of Commodore Barry Park (the "Park"). We are a grass roots group of volunteers dedicated to supporting and caring for the Park through stewardship, advocacy, and cultural programming.. Founded in 2014 and with the support of Partnerships for Parks and City Parks Foundation, we have brought art, music, and community-based exhibitions and events to the park that has strengthened the Park's role as a shared and essential green space in Fort Greene, Brooklyn.

Commodore Barry Park spans ten acres and is both a vital historic resource and the first park created in Brooklyn. The Park serves residents of Farragut Houses, Ingersoll, Whitman and the Navy Yard Houses including residents of the newer Downtown Brooklyn developments. Along with Fort Greene Park, it is a shared and regularly used space that supports the Fort Greene community and its neighboring residents.

For the past six years, Friends of Commodore Barry Park has maintained a close partnership with Fort Greene Park Conservancy in the areas of funding, programming, and advocacy. That relationship has been deeply meaningful to us as a volunteer organization and has strengthened our ability to serve the public. As volunteers, there is often a real concern that our voices may not always be heard, which is why this partnership and shared advocacy are so important. We stand together in support of a parks and open space district approach.

We have also valued our relationship with ALLOY Development over the past two years and appreciate their support of our programming initiatives. We are especially grateful for their invitation to participate on their Community Advisory Board and for the opportunity to engage in dialogue.

At the same time, we must express concern about the projected impact of the **240 Nassau/50 Navy Streets** project on park use and park conditions. Over the years we have already seen a steady increase in park usage, including a notable rise in the number of visitors with dogs. While we would like to believe this growth is due to our advocacy and outreach, the truth is it stems mainly from expanding residential density and heavier park reliance, conditions that will grow further once the **240 Nassau/50 Navy Streets** project is completed. Commodore Barry Park is currently understaffed, and we are concerned about how increased foot traffic and activity associated with the completed project will affect maintenance, safety, and the overall condition of the Park.

We offer these comments in the spirit of partnership and shared responsibility for the neighborhood. We welcome continued dialogue and collaboration to help ensure that Commodore Barry Park remains healthy, accessible, and well supported for all who depend on it.

Sincerely,

s/René Scotland

Rene Scotland, Founding Member
Friends of Commodore Barry Park

TRANSCRIPT

Public Scoping Meeting

240 Nassau Street Rezoning Project

January 27, 2026

Virtual Meeting on Zoom

>>JENNIFER MALDONADO: You are joining the remote public scoping session for the 240 Nassau Street rezoning project for 240 Nassau Street and 50 Navy Street. My name is Jennifer Maldonado. I am the Chief Executive Officer of the New York City Educational Construction Fund or ECF. I'll be presiding over today's scoping session in accordance with the State Environmental Quality Review Act, which is commonly referenced as SEQRA. The scoping session is not a Q&A. The purpose of this session is to gather comments that will inform the scope of work and its impacts. Comments will be considered and where relevant, will be reflected in the Final Scope of Work, which serves as the framework for the EIS.

Today's date is January 27, 2026, and the time now is approximately 5:06 PM. Please note that the session is being recorded.

ECF is a New York State public benefit corporation, which builds New York City Department of Education public schools through mixed-use development projects without the use of DOE capital funding. Our mission is to build safe, secure learning environments.

On December 22nd, 2025, ECF assumed designation as the SEQRA lead agency for the 240 Nassau Street rezoning project's application. The full Environmental Assessment Form was prepared, and ECF determined the project to be a Type 1 action. The proposed action has the potential to result in one or more significant adverse environmental impacts in one or more environmental areas and determined that a draft environmental impact statement, or DEIS, was required.

ECF circulated its Positive Declaration, Notice of Scoping, and Draft Scope of Work to involved and interested agencies, and published a notice in the City Record and New York State Department of Environmental Conservation's Environmental Notice Bulletin on December 27th, 2025.

No one has requested language interpretation for the scoping session. However, if there is a need for translation, the recording of this session will later be translated. Any comments on the Draft Scope of Work received in languages other than English will be translated and considered.

American Sign Language Interpretation will occur within the main Zoom window. If you are experiencing any audio issues at any time during the session, please dial 877-853-5247. Or 888-788-0099. Or 646-558-8656 with session ID 897-9268-8607 and passcode 1 to participate by phone.

For other technical issues, please call the number above, 877-853-5247 and enter meeting ID 897-9268-8607 and password 1 to receive help.

Together, we are here to receive comments on the Draft Scope of Work for the 240 Nassau Rezoning Project. The Draft Scope of Work identifies all subjects that will be analyzed in the Draft Environmental Impact Statement and explains how those subjects will be studied. The draft scope is available at the website shown on the screen schools.nyc.gov/community/facilities/ecf.htm.

The purpose of today's scoping session is to allow for public participation in the preparation of the DEIS. We also welcome written comments on the Draft Scope of Work. Those comments can be submitted through 5:00 PM on February 6th, 2026.

Email or mail the comments to the address on the screen. Please address those comments to Jennifer Maldonado. New York City Educational Construction Fund, 2501 Jackson Avenue, Long Island City, New York, 11101. Or JMaldonado10@schools.nyc.gov.

No decisions will be made today regarding the Draft Scope of Work. A final scoping document for the Draft Environmental Impact Statement will be based on a full consideration of the comments received in the draft scoping document, either orally here today or in writing before the end of the comment period.

Today's session is divided into two parts. During the first part of the session, we will have a brief overview describing the 240 Nassau Rezoning Project and the summary of the Draft Scope of Work. During the second part of the session, we will receive comments on the draft scope from government elected officials, Community board representatives, organizations, and the public. The session will only end when everyone who has signed up to provide testimony has had an opportunity to be heard. Today's session, as I noted, will not be a question-and-answer session, but is intended to allow the public the opportunity to provide meaningful input regarding the scope and the content of the Draft Environmental Impact Statement. Comments will be noted and responded to in the Final Scope of Work.

Zoning approvals for the project will later require a public review in accordance with the City's ULURP process. ULURP includes input from the community board, borough President, City Planning Commission, and City Council.

A few logistics for today's scoping session. If you did not have previously register to speak, but would like to, please use the raise hand function to provide oral testimony during the public comment portion of tonight's session. To those who have joined by telephone, you may dial 9 to indicate your desire to speak.

Participants using the raise hand function or asterisk 9 will be added to the enter the speaker list in the order in which they've raised their hand or press 9.

Once you have spoken, we will lower your hand.

Speakers will be identified by their name or by the last three digits of their phone number.

The option to sign up to speak will end at 6:45 PM.

If you are reading prepared comments, it will be helpful to us if you would email a copy of your comments to ECF at JMaldonado10@schools.nyc.gov.

When it is your turn to speak, your name will be called, and you will be granted temporary speaking privileges by the session administrator, which will allow you to temporarily unmute your microphone.

Please note that promoting speakers can take some time, so please be patient.

Once your name has been called. Unmute your microphone or telephone and start your remarks. To allow us to hear from everyone who wishes to speak, we ask that you please limit your remarks to 3 minutes. You will note a 3-minute countdown clock will run on the screen. You will be advised when 10 seconds are remaining and when time has expired. Lines will be muted for speakers who go past 3 minutes.

If you've joined by telephone today, we will announce within 3 minutes… I'm sorry, we will announce when 3 minutes has passed.

Next, the applicant team will provide a summary of the proposed project program the requested discretionary approvals required to implement the project and a summary of the proposed scope of analysis for the EIS.

I'll now hand it over to the Alloy team.

>>JARED DELLA VALLE: Thank you, Jennifer. Good afternoon, everyone. My name is Jared Della Valle, and I'm the CEO of Alloy Development.

Alloy is an architecture and development company based in Dumbo, Brooklyn, about a half a mile from the project site. We've been in business for 20 years and are a certified B corporation, with a corporate mission to make Brooklyn beautiful, equitable, and sustainable.

We are deeply committed to community engagement, and since acquiring 240 Nassau Street almost 2 years ago, Alloy has formed a community advisory group, held over 100 community meetings and received feedback from more than 1,000 community members to help inform our initial proposal for this

project. The scoping session is the first official milestone of this project's approval process and will serve as a continuation of our work with the community.

The project site is bounded by Nassau, Navy, and Concord Streets to the west. The site is bounded by the Brooklyn Queens Expressway and Golconda Playground, a public park maintained by the New York City Department of Parks and Recreation. Alloy controls 240 Nassau Street, occupied by the Madison Square Boys and Girls Club, and the New York City Department of Education controls the 50 Navy Street portion that currently houses PS287, as well as the Community Roots Charter School.

The proposed project fulfills a number of specific goals and needs.

The project enables ECF to make a larger step toward fulfilling school capital and capacity needs in downtown Brooklyn by providing a state-of-the-art school facility.

The creation of approximately 1,500 residential units, including 300 units of permanently affordable housing.

The creation of new retail uses for local workers, residents, and visitors, and the addition of 15,000 square feet of cultural facility.

And the creation of new publicly accessible outdoor space.

The proposed project would result in the development of four buildings containing a total of 1,701,000 square feet. Construction would begin with the development of two buildings, the mixed-use residential and community facility building would be on the west side of Nassau Street, and the mixed-use retail and school building on the corner of Nassau and Navy Streets.

Upon completion, construction of the mixed-use retail and residential building at the intersection of Navy and Concord Streets and the residential building on Concord Street adjacent to Golconda Playground would begin. About one half acre of privately owned public space would be created between the buildings to connect to the basketball courts at Golconda playground. The proposed project includes a mix of public and private uses, including 121,000 square feet of public school space, up to 1,502 mixed-income residential units, including up to 301 affordable units, 34,000 square feet of retail, and 45,000 square feet of community facility space. The proposal assumes a floor area ratio of 18. The preliminary design has tower heights of approximately 55 and 65 stories.

The next few slides include a selection of illustrative project renderings. This view facing south shows the school and residential entrances along Nassau Street.

This view, facing southwest, shows stand-alone school building at the intersection of Nassau and Navy streets.

This view, facing northeast, shows the project's seamless connection with Golconda Playground on the bottom of the figure.

Over this next year, we will continue to refine the project with the review agencies, the community advisory group, and other important community stakeholders. We look forward to your feedback on the first step of our approval process.

I will now be followed by Nora Martins of Akerman, our Land Use Council, who will describe the requested discretionary approvals, and Linh Do of AKRF will provide a summary of the proposed scope analysis for the EIS.

>>NORA MARTINS: Thank you, Jared. My name is Nora Martins. I'm a partner at Akerman LLP, and we are Land Use counsel for Alloy Development for this project. There are a number of discretionary actions needed in order to develop the proposed project.

The discretionary zoning actions will be reviewed under the Uniform Land Use Review Procedure, also known as ULURP, which will require approval by the New York City Planning Commission and the New York City Council. These actions include a zoning map amendment to change the project site from an R6 zoning district to a C6-12 zoning district, a zoning text amendment to modify Zoning resolution section 74-752 to make the provisions of that special permit applicable to the project site.

A second zoning text amendment to Appendix F to designate a mandatory inclusionary housing area. And finally, a zoning special permit pursuant to modified zoning resolution section 74-752, which would seek to modify Zoning resolution sections 70… uh, sorry, 27-131, 23-342, 23-433, 36-62 and 35-631(c) to modify certain bulk use, parking, loading, and MIH requirements.

In addition to the actions that require ULURP approval, the proposed project also includes other related actions that require environmental review. This includes the transfer, reallocation, and lease of property among the developer, ECF, and the City of New York to allow for schools in the new location, the proposed development, and ECF financing. Additionally, ECF would issue tax-exempt bonds to facilitate construction of the school.

I'll now turn it over to Linh to discuss the proposed scope of the environmental reviews for these actions.

>>LINH DO: Thank you, Nora. I'm Linh Do, a Senior Vice President at AKRF. Our firm will be preparing the Environmental Impact Statement. I'm here to speak about the draft scoping document and its place in the environmental review process. The scoping document is a roadmap for the EIS.

In addition to providing an overview of the project, it identifies the areas to be analyzed. As well as the methodologies and analysis approach to be used in the preparation of the draft EIS. Where applicable, we will use the City's CEQR Technical Manual as the general guide on the methodologies and impact criteria for evaluating potential effects on the various areas of analysis. This is a detailed guidance document that sets the framework for environmental reviews here in New York City.

The scope is first issued as a draft, followed by a comment period, including a public meeting, which is what we're holding here today. Based on the input from the relevant review agencies and your input, a final scope will be issued, reflecting changes or elaborations as necessary.

This final scope will be the framework of the DEIS. For each of the relevant technical areas of analysis, the DEIS will provide a description of existing conditions, assessments of future conditions with and without the proposed actions for 2033, when construction of the entire project is anticipated to be complete and operational. The analysis of future conditions will account for background growth as well as discrete projects that may be completed by 2033.

Absent the approval of the requested actions. A reasonable worst-case development scenario was developed. Alloy would move forward with a no-action residential development on its parcels containing approximately 84 market rate units. Under this scenario, the existing school building would continue to operate. We will determine the incremental changes expected to occur as a result of this project. It is this delta between the conditions, with and without the actions of the project in the future that will be the basis for, um, assessing the potential for significant adverse impacts.

Next slide, please. The CEQR Technical Manual outlines approximately 20 technical areas. As shown here on the slide, that should be considered in assessing a project's potential effects. The Draft Scope of Work proposes to examine the actions and the effects on these environmental areas of concern. Where there is a potential for significant adverse impacts identified, the Draft EIS will identify potential mitigation measures and disclose those that may be unavoidable. It will also discuss potential alternatives to the proposed project program that would either reduce or avoid the potential for impacts.

While the draft scoping document details the approach and methodology to be applied for each of these relevant environmental areas, I'd like to highlight some of the particular areas that this project's DEIS will assess.

Next slide, please. As Jared described earlier, the project site is adjacent to Golconda Playground, and across the street from Commodore Barry Park. The project will also create new open space to connect with the existing Golconda Playground. The DEIS will assess the potential effects of the introduction of new users demand on these open spaces, and will also assess the potential shadow effects from the proposed towers on these open spaces.

Next slide, please. The proposed project's program and preliminary site plan has been shared with New York City Department of Transportation. We have been working with that agency to define the traffic network to be studied. In addition to traffic, the DEIS will assess the project effects on the local transit

system. As you can see here, the project area is served by the York Street subway station. Um, that's with the F train, the F line, and the High Street Station, which has the A and C trains. In addition, we will also be looking at the local bus routes and the ferry at the Brooklyn Navy Yard Citywide Ferry Landing. Pedestrian circulation and school safety assessments will also be prepared as part of this EIS.

Next slide, please. And lastly, the DEIS will consider the construction analysis to assess the potential impacts related to transportation, air quality, and noise. Based on the preliminary design, the project team is in discussions to relocate the existing school during construction. As part of the planning for construction logistics, access to the existing parks will be maintained to the extent practicable during the construction period.

I want to note that we have not completed the impact studies. We are looking here for feedback on the issues to be addressed in the EIS. Your comments might cover such things as suggested study areas, analysis approach, and particular local issues and other things you think are important to be reflected in the DEIS Scope of Work.

Thank you for your time and coming tonight to give us your feedback. And now I'd like to hand this back to Jennifer.

>>JENNIFER MALDONADO: Hello. Okay, so we will… we are ready to start the process of accepting your verbal comments.

Each speaker will be allowed 3 minutes to make sure that everyone gets a chance to provide their thoughts here tonight. I'll begin by calling the names of those who have previously registered to speak.

As a reminder, you can register to speak at any time this evening by clicking on the Raise Hand icon, or by telephone, dial 9. Participants will be added to the queue in the order in which they notified the hosts.

Once your name or number has been called, unmute your microphone or telephone and begin your remarks.

The option to sign up will end at 6.45pm.

As a reminder, remarks are limited to 3 minutes. A 3-minute countdown clock will run on the screen for each speaker. Hosts will advise when 10 seconds are remaining, or when time is expired. Lines will be muted for speakers who go more than 10 seconds past 3 minutes.

We will begin by hearing from any government elected officials, community board, or organizations on the call. At this time, we have 3 individuals that are scheduled to speak. We will start with the first speaker, Irawati Anand.

>>IRAWATI ANAND: Um, thank you. Um… Am I audible?

>>JENNIFER MALDONADO: Yes.

>>IRAWATI ANAND: Um, thank you. Um, good evening. My name is Irawati Anand, uh, I'm the Real Estate and Planning Manager at the Downtown Brooklyn Partnership.

I'm speaking on behalf of DBP to express strong support of the proposed redevelopment at 50 Navy Street and 240 Nassau Street. This area urgently needs transformative investments. In recent years, it has lost a daycare, a community center, and the Boys and Girls Club. The adjacent public housing needs hundreds of millions in repairs. No new school has been built here in over 20 years, and the existing school at this site needs upgrading.

This neighborhood deserves better. In addition, New York City faces a severe housing crisis. This project addresses all these challenges with the interests of the local community at the core. The project delivers an estimated $290 million in public benefits without requiring any city capital dollars… a new 120,000

square foot school for 700 students, a 27,000 square foot community center, 15,000 square foot cultural space, and 21,000 square feet of new public open space, 1,500 housing units, including 300 permanently affordable apartments and 95 units dedicated to Seniors.

At a time when the city desperately needs housing, this project steps up in a major way. It also creates 4,000 jobs and activates the ground floor with retail that will support the local economy. The partnership has long advocated for investments that rectify the effects of 1950s-era infrastructure projects. Beginning with DBP's Brooklyn Strand project, through to the $10 million in funding from the state's Downtown Revitalization Initiative, the DBP garnered for projects at this exact location. DBP has been a vigorous proponent of projects and strategies that provide more equitable access to jobs, quality open space, educational and cultural activities. The developers have engaged the community through a genuine public-private partnership. Bringing in local partners, seeking input, and committing to address real neighborhood needs. This level of comprehensive benefit in a single development is rare, and exactly what this neighborhood and the greater downtown Brooklyn region needs.

We strongly urge the City to approve this application.

Thank you.

>>JENNIFER MALDONADO: Thank you very much. Our next speaker is… Superintendent Meghan Dunn.

>>MEGHAN DUNN: Good evening, everyone. Thank you so much for being here and for inviting me this evening. My name is Megan Dunn, and I am the Superintendent for District 13. And I'm very grateful to be able to speak about this opportunity for the proposed new building for PS287, the Dr. Bailey K. Ashford School, which is a pre-K through 5th grade, IB-accredited school currently located at 50 Navy Street. A new facility for PS287 is more than just a construction progress. It's an investment in our children, our families, and the long-term strength of District 13.

PS287 has always been a school rooted in the community, serving our youngest learners with care and commitment. And as we look ahead, this is an opportunity to ensure that the physical environment matches the spirit of the school that it is welcoming, forward-thinking, and designed for the full range of academic, artistic, and social-emotional learning that our students deserve.

A modernized building will allow us to expand programming, support student growth, and create spaces that reflect the kind of learning that we champion throughout District 13, collaborative, engaging, and deeply connected to the world around us. It also will strengthen the long-term stability of our district, as families continue to seek high-quality public school options in this neighborhood.

As superintendent, I am fully in support of this project, and I'm equally committed to making sure that it unfolds with transparency and partnership and respect for the families and neighbors who all call District 13 home.

Thank you very much.

>>JENNIFER MALDONADO: Thank you very much. The next speaker is Samantha Johnson. Samantha?

>>SAMANTHA JOHNSON: Hello, good evening, everyone. My name is Samantha Johnson. I'm a community member, grassroot organizer, and local NYCHA resident. Um, I am speaking on behalf of the community members who have not really been included in this process. It has been since 2023, where the Fort Green Farragut Fort Green Coalition has been adamantly arguing about true transparency and accountability for any project that was going to be developed on this site. I will give credit to the current developers who have been working with a smaller team to speak about the issues that they felt that would be the most to highlight. Unfortunately, that true investment of collaboration was not transmitted. Even

you can see on the call of individuals who are on presently are not really a full representation of those who really need to hear what the plans are for not only the school, but for the next decade of our community.

So, I stand with inquiry and definitely curiosity about how is this project going to impact the environmental… from the asthma rates that are happening in our community to the flooding that happened just a couple of years ago, where the area in which this building will be built has a moderate to a high flood area. What is going to be done in regards to that?

Also, the tax breaks that is being stated… there is still some form of tax kickbacks that will be given, and since that is going to be given, we do need to fight for true low-income affordability that's not only about offsetting where the other community projects are going to be, but also thinking about how are the community members who are going to be displaced and impacted by this development. The last thing I will also say is that the community choice of the retail spaces are also concerning. Uh, we need more than just a cultural center. We need health facilities, we need places that are going to enrich our communities, um, not only in the cultural sense, which is a bit off-putting, um, that that would be the selection, but also just thinking about the full roundedness and the quality of life of community members in the Fort Green area as a whole.

I know that a statement was made about this is bigger than Farragut, but as a person who's lived in Fort Green for over 25 plus years, and this development being on the Farragut adjacent to, I think it needs to be way more intentional about the community members in which it's going to serve. I am grateful that there's going to be conversations with the New York City Housing Authority about intentional placement and selection of these units to the community members. I just hope that those promises that were cited in the most recent meetings will be fulfilled, and that all partners will look beyond just the community partners that were gathered for the 12 or 15 people, but for the community as whole. And lastly, I'll just close and just say we are grateful that you all are having this meeting. We really would love it if it would be expanded and also interacted in person. Thank you so much.

>>JENNIFER MALDONADO: Thank you, Samantha. Our next, uh… Our next, uh, presenter is Kalvis Mikelsteins. Kalvis?

>>KALVIS MIKELSTEINS: Hi, good evening, can you hear me?

>>JENNIFER MALDONADO: Yes, we can hear you.

>>KALVIS MIKELSTEINS: Great, thanks. Uh, hi, thank you for taking the time to present this development proposal. Uh, my name is Kalvis Mikelsteins, I'm the Vice President of Operations and Planning at the Dumbo BID. On behalf of the BID, I'd like to voice our strong support for this development. Alloy has a proven track record of, uh, thoughtful, aesthetic, and community-focused design in Brooklyn. And the BID is excited by this proposal. The proposed redevelopment focuses on three critical uses… housing, education, and community services. These, combined with the actions of connecting the spaces with adjacent public spaces, will benefit the area.

The development also provides an excellent opportunity to re-examine the interstitial spaces between downtown Brooklyn, Dumbo, Vinegar Hill, the Navy Yard, and the surrounding area. Some of which suffer from poor lighting, inadequate sidewalk conditions, and weak connections to transit.

This development poses an opportunity to greatly improve the quality of life for those who would occupy the new development and the surrounding community. The redevelopment of this site could address the numerous needs for the local community, additional housing, a redeveloped school and community center, and revamped public spaces.

The BID is pleased that Alloy is taking on this project, and we strongly urge the City to approve this application. Thank you for your time and letting me speak tonight.

>>JENNIFER MALDONADO: Thank you very much. Are there any attendees that would like to speak and did not place their name on the list? If you would raise your hand. Okay, what we're going to do is that we will continue to monitor those individuals that would like to speak.

We'll take a 10-minute break. Just to be able to gather, um, new attendees, and we will come back in… at approximately 5:47.

…

Hello again. Um, again, are there any new participants that would like to speak. If so, please raise your hand.

Okay, with that in mind, we're going to actually take a slightly longer break, 15 minutes. And then we will jump back on, and hopefully we have other individuals that would like to speak. So, we will see you back here in approximately 15 minutes.

…

Hello, um, I am checking and it does not appear that we have any others that have signed up to sign, uh, to speak.

Is there anyone in the audience that we are missing that would like to speak? Please raise your hand. Okay, so with that, we will take… Another break, uh… Uh, and we will… rejoin at 6:20, another 15-minute break, or… 16-minute break, and we will rejoin at 6:20 to see if there are other speakers.

…

Hello, uh, checking to see if there's any speakers that still wish to speak and have not signed up.

As we don't have any new speakers on the list, we will take a break until 6:45, and that will be our last break of the evening, so… We will rejoin you all in about 25 minutes.

…

Great. We have one additional speaker who's just joined us. This is Principal Everbell Bishop from K287. Principal Bishop will give you the floor.

>>EVERBELL BISHOP: Hello, good evening, everyone. Um, I didn't prepare to speak, but I am glad to be able to be on. Um, just to be able to hear the scope of the work that's moving forward. Um, and hopefully be able to continue the collaboration and conversation.

>>JENNIFER MALDONADO: Oh, I'm sorry, Principal Bishop, uh… So, are you… That's… that's your… that's… that's what you wanted to convey to us.

>>EVERBELL BISHOP: No, I didn't register to speak, that's why I was like, oh, okay.

>>JENNIFER MALDONADO: Oh, okay. I was thinking about it. Oh, no worries. We had you on, um, as a speaker, so… but we appreciate your attendance, and look forward to continue working with you.

>>EVERBELL BISHOP: No problem. If I have anything, I'll just kind of message you guys. Okay.

>>JENNIFER MALDONADO: Sounds great. Thank you very much.

>>EVERBELL BISHOP: Sorry, yes.

>>JENNIFER MALDONADO: Okay, um, as there are no other speakers that I see on the list that have asked… oh, I'm sorry, we have one last speaker. The Reverend Mark VC Taylor is joining us. Reverend… sorry, Reverend Taylor, you have the floor.

>>REVEREND MARK VC TAYLOR: All right, thank you very much, Jennifer. Uh, I'm sorry I'm late, I had another commitment. Just wanted to mention, uh, that there are several parts of the community that I'm not sure were informed about tonight. Uh, and I think, uh, the coalition. Uh, you perhaps you've heard from someone in the coalition. But the, uh, tenant association is a part of the, uh, Farragut-Fort Green Coalition. And, uh, there is a group led by Dorian Mueller, that's part of the coalition. And there are some other churches in the coalition.

Our concern is over many things. I think we were at a meeting with Jennifer where we expressed some concern about how the community was notified and informed of the changes regarding PS287.

Let me just also say, as the pastor of the church, we're very concerned about the, uh, environmental impact. Parking is at a crisis level in the neighborhood. Uh, there are 3 or 7 years of construction. How will that affect the community? The, uh, rates of pollution in the community, the rates of, uh, lead poisoning are very high, being that we're already around the highways.

And, uh, I have not yet, uh. been appraised, uh, maybe this information is out there, but I haven't been appraised on how this is going to affect the immediate community. Church is right across the street from, uh, all the buildings and the entire complex and so, uh, we're very concerned about that.

Also, some concerns about affordability. Uh, we are raising the question of whether or not the affordability is big enough, so that people who might want to apply from public housing can be informed. And we would want, uh, in one of the buildings over, I believe, over 90% of the housing is market rate. And in another one, it's just 20%. But we would like to see that raised to, uh, 40% in both buildings to make it more affordable to people who live in public housing, which has a long waiting list of people to come in. Uh, if… if people could apply, particularly from across the street in Farragut, it would help, uh… it would help the. community that's there to be more diversified. And it would relieve the public housing waiting list.

So, these are just some, uh, the general concerns. Uh, we appreciate the fact that there's gonna be a senior building. We know that there's senior housing, but our concern is for the school and the affordability issue.

Thank you very much, I appreciate this opportunity.

>>JENNIFER MALDONADO: Thank you, Reverend. I appreciate your comments.

With that, I believe we've reached the end of the presentation, the, um, the comments. As there are no more speakers signed up, on behalf of ECF, we genuinely thank you for your participation.

In closing, everyone is reminded that ECF will be accepting written comments on the ECF 240 Nassau Street Rezoning Project until 5 PM on February the 6th.

Again, written comments can be directed to myself, Jennifer Maldonado at ECF, 25-01 Jackson Avenue, Long Island City, 11101, or submit it by email to jmaldonado10 at schools.nyc.gov.

The time is now 6:50. The meeting is now closed.

>>END