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Response to Comments on the DEIS

Introduction

This document summarizes and responds to comments on the Draft Environmental Impact Statement (DEIS) for the Monitor Point project published on December 12, 2025.

City Environmental Quality Review (CEQR) requires a public hearing as part of the environmental review process. Oral and written comments were received during the meeting held by the New York City Planning Commission on March 18, 2026. Written comments were accepted from issuance of the DEIS through the close of the public comment period, which ended on Monday, March 30, 2026. **Appendix H** contains the written comments received on the DEIS. Where relevant and appropriate, the Final Environmental Impact Statement (FEIS) has been modified to incorporate and address substantive public comment on the DEIS.

Section 1 of this document lists the elected officials, organizations, and individuals that provided relevant comments on the DEIS. **Section 2** 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 DEIS. Where more than one commenter expressed similar views, those comments have been grouped and addressed together.

1. List of Elected Officials, Organizations, and Individuals who Commented on the Draft Environmental Impact Statement

Elected Officials

1. None

Organizations and Interested Public

2. 61 Franklin Street Community Garden, written testimony dated March 17, 2026 (61 Franklin Street Community Garden)
3. Alex Mazza, member of the public, verbal testimony dated March 18, 2026 (A. Mazza)
4. Allison Fischer, Friends of Bushwick Inlet Park, verbal testimony dated March 18, 2026 (A. Fischer)
5. Alon Hillel-Tuch, ACT-UAW LOCAL 7902, written testimony dated March 17, 2026 (A. Hillel-Tuch)
6. Alyosha A. Smolarski, member of the public, written testimony dated March 18, 2026 (A. A. Smolarski)
7. Andrea Odezynska, member of the public, written testimony dated March 17, 2026, verbal testimony dated March 18, 2026 (A. Odezynska)
8. Andrew Barrocas, member of the public, written testimony dated March 18, 2026, verbal testimony dated March 18, 2026 (A. Barrocas)
9. Andrew Catchaturyan, member of the public, written testimony dated March 17, 2026 (A. Catchaturyan)
10. Andrew McDowell, Greenpoint Monitor Museum, written testimony dated March 18, 2026 (A. McDowell)
11. Ari Espinal, Local 79, verbal testimony dated March 18, 2026 (A. Espinal)
12. Arthur Kirmss, member of the public, written testimony dated March 30, 2026 (A. Kirmss)
13. Ashton Applewhite, member of the public, written testimony dated March 18, 2026 (A. Applewhite)
14. Ben Thypin, member of the public, written testimony dated March 18, 2026 (B. Thypin)
15. Bianca Bello, member of the public, written testimony dated March 17, 2026 (B. Bello)
16. Bobi Jo Homer, member of the public, written testimony dated March 20, 2026 (B J. Homer)
17. Luz Rosero, United Neighbors Organization, verbal testimony dated March 18, 2026 (L. Rosero)
18. Brighid O'Dea, member of the public, written testimony dated March 17, 2026 (B. O'Dea)
19. Camille Hastick, Brooklyn Chamber of Commerce, written testimony dated March 20, 2026 (C. Hastick)
20. Carla Queme, Monitor developments, verbal testimony dated March 18, 2026 (C. Queme)
21. Carol Szumski, member of the public, written testimony dated March 30, 2026 (C. Szumski)
22. Carolina Moffa, member of the public, written testimony dated March 18, 2026 (C. Moffa)
23. Carolina Romano, member of the public, written testimony dated March 18, 2026 (C. Romano)
24. Caroline Caglioni, member of the public, written testimony dated March 30, 2026 (C. Caglioni)
25. Catherine Vaughan, Abundance New York, verbal testimony dated March 18, 2026 (C. Vaughan)
26. Chad Purkey, Association for a Better New York (ABNY), written testimony dated March 18, 2026 (C. Purkey)
27. Chris Dunn, Save the Inlet, written testimony dated January 21, 2026, verbal testimony dated March 18, 2026 (C. Dunn)
28. Christina Agnes Love, member of the public, written testimony dated March 20, 2026 (Ca. Love)

29. Cory Kantin, Brooklyn CB 1, written testimony dated March 30, 2026 (C. Kantin)
30. Cristal Kayel, member of the public, written testimony dated March 20, 2026 (C. Kayel)
31. Dan Miller, member of the public, verbal testimony dated March 18, 2026 (D. Miller)
32. David Marker, member of the public, written testimony dated March 20, 2026 (D. Marker)
33. David Walsh, Breaking Ground, verbal testimony dated March 18, 2026 (D. Walsh)
34. Deborah Mcallister, New York City Housing Partnership, verbal testimony dated March 18, 2026 (D. Mcallister)
35. Debra Funkhouser, member of the public, written testimony dated March 30, 2026, verbal testimony dated March 18, 2026 (D. Funkhouser)
36. Dennis J. Duffy, member of the public, written testimony dated March 30, 2026 (D. J. Duffy)
37. Dewey Thompson, member of the public, verbal testimony dated March 18, 2026 (D. Thompson)
38. Dina Rabiner, North Brooklyn Chamber of Commerce, written testimony dated March 20, 2026 (D. Rabiner)
39. Dr. Ewa Smyk-Fidel, member of the public, written testimony dated March 27, 2026 (E. Fidel)
40. Edwin Auguste, Local 79, verbal testimony dated March 18, 2026 (E. Auguste)
41. Elizabeth Adams, Brent Bovenzi, Hunter Armstrong, Bronwyn Breitner, Kevin Lacherra, Sara Lind, and Solveig Entwistle, Transportation Alternatives, written testimony dated March 30, 2026 (E. Adams)
42. Elizabeth Braswell, member of the public, written testimony dated March 19, 2026 (E. Braswell)
43. Elizabeth Roncketti, member of the public, written testimony dated March 30, 2026 (E. Roncketti)
44. Emily Delora, member of the public, written testimony dated March 28, 2026 (E. Delora)
45. Eric Lefcowitz, member of the public, written testimony dated March 18, 2026 (E. Lefcowitz)
46. Erika Jakubassa, member of the public, written testimony dated March 17, 2026 (E. Jakubassa)
47. Erin Carroll, member of the public, written testimony dated March 20, 2026 (E. Carroll)
48. Fig Chilcott, member of the public, written testimony dated March 18, 2026 (F. Chilcott)
49. Francisco Zarate, Local 79, verbal testimony dated March 18, 2026 (F. Zarate)
50. Frank Clark, New York Building Congress, verbal testimony dated March 18, 2026 (F. Clark)
51. Frank Lang, St. Nick's Alliance, verbal testimony dated March 18, 2026 (F. Lange)
52. Gabe Williams, member of the public, written testimony dated March 18, 2026 (G. Williams)
53. Gabriel Dougherty, member of the public, verbal testimony dated March 18, 2026 (G. Dougherty)
54. Gabriel Williams, member of the public, verbal testimony dated March 18, 2026 (G. Williams)
55. Emily George, member of the public, written testimony dated March 18, 2026 (G. George)
56. George Weinmann, Greenpoint Modern Museum, verbal testimony dated March 18, 2026 (G. Weinmann)
57. Helen Chang, member of the public, written testimony dated March 18, 2026 (H. Chang)
58. Helena Yang, member of the public, written testimony dated March 18, 2026, verbal testimony dated March 18, 2026 (H. Yang)

59. Howard Slatkin, member of the public, written testimony dated March 18, 2026, verbal testimony dated March 18, 2026 (H. Slatkin)
60. Ida Marx, member of the public, written testimony dated March 20, 2026, verbal testimony dated March 18, 2026 (I. Marx)
61. Sourikhunh Konekeo, member of the public, written testimony dated March 20, 2026 (S. Konekeo)
62. Irak Cehonski, New York State Association for Affordable Housing, verbal testimony dated March 18, 2026 (I. Cehonski)
63. Isrrael Rodriguez, Local 79, verbal testimony dated March 18, 2026 (I. Rodriguez)
64. James Morrison Hevert, member of the public, verbal testimony dated March 18, 2026 (J. Hevert)
65. Janice Lauletta-Weinmann, Greenpoint Monitor Museum, verbal testimony dated March 18, 2026 (J. Lauletta-Weinmann)
66. Jason Beckwith, member of the public, written testimony dated March 20, 2026 (J. Beckwith)
67. Jeanne Boineau, member of the public, written testimony dated March 26, 2026 (J. Boineau)
68. Jenni Pietromonaco, member of the public, written testimony dated March 21, 2026 (J. Pietromonaco)
69. Jens Rasmussen, member of the public, written testimony dated March 20, 2026 (J. Rasmussen)
70. Jerry Mraz, member of the public, written testimony dated March 18, 2026, verbal testimony dated March 18, 2026 (J. Mraz)
71. Jessica Christy, Greenpoint Monitor Museum, verbal testimony dated March 18, 2026 (J. Christy)
72. Joan Dougherty, The Corcoran Group, written testimony dated March 17, 2026 (J. Dougherty)
73. Joanna Zdziaszek, member of the public, written testimony dated March 21, 2026 (J. Zdziaszek)
74. John Gregor, member of the public, written testimony dated March 30, 2026 (J. Gregor)
75. Jonathan Jackson, member of the public, verbal testimony dated March 18, 2026 (J. Jackson)
76. Jonathan Suarez, Community Board 1, verbal testimony dated March 18, 2026 (J. Suarez)
77. Julian Gilbert-davis, member of the public, written testimony dated March 18, 2026 (J. Gilbert-davis)
78. Karen Olszewski, member of the public, written testimony dated March 19, 2026 (K. Olszewski)
79. Kate Yourke, member of the public, written testimony dated March 27, 2026, verbal testimony dated March 18, 2026 (K. Yourke)
80. Katherine Thompson, Save the Inlet, written testimony dated March 30, 2026, verbal testimony dated March 18, 2026 (K. Thompson)
81. Kirsten Gottbrecht, member of the public, written testimony dated March 18, 2026 (K. Gottbrecht)
82. Kyron Banks, 32BJ, verbal testimony dated March 18, 2026 (K. Banks)
83. Laura Hofmann, member of the public, written testimony dated March 20, 2026, verbal testimony dated March 18, 2026 (L. Hofmann)
84. Laura Treciokas, member of the public, verbal testimony dated March 18, 2026 (L. Treciokas)
85. Lauren Roper, member of the public, written testimony dated March 20, 2026, verbal testimony dated March 18, 2026 (L. Roper)

86. Leigh Celentano, member of the public, written testimony dated March 18, 2026, verbal testimony dated March 18, 2026 (L. Celentano)
87. Lisa Goren, Long Island City Coalition/Hunters Point Community Coalition (LICC-HPCC), written testimony dated March 18, 2026, verbal testimony dated March 18, 2026 (L. Goren)
88. Lisa Jaeggi, member of the public, written testimony dated March 18, 2026 (L. Jaeggi)
89. Luke Eddins, Seaweed City, written testimony dated March 19, 2026 (L. Eddins)
90. Luke Lavanway, member of the public, verbal testimony dated March 18, 2026 (L. Lavanway)
91. Maisha Morales, Southside United HDFC-Los Sures, verbal testimony dated March 18, 2026 (M. Morales)
92. Margaret Flanagan, member of the public, written testimony dated March 30, 2026, verbal testimony dated March 18, 2026 (M. Flanagan)
93. Maria Kura, member of the public, written testimony dated March 18, 2026, verbal testimony dated March 18, 2026 (M. Kura)
94. Marissa Bohk, member of the public, written testimony dated March 17, 2026, verbal testimony dated March 18, 2026 (M. Bohk)
95. Marta Koziorzebska, member of the public, written testimony dated March 18, 2026 (M. Koziorzebska)
96. Martyna Szczęsna, member of the public, written testimony dated March 17, 2026, verbal testimony dated March 18, 2026 (M. Szczęsna)
97. Mary Ellen Bizzarri, member of the public, written testimony dated March 17, 2026 (M.e. Bizzarri)
98. Matt Meoni, member of the public, verbal testimony dated March 18, 2026 (M. Meoni)
99. Matteo Giavazzi, member of the public, verbal testimony dated March 18, 2026 (M. Giavazzi)
100. Michael Abramson, member of the public, written testimony dated March 18, 2026, verbal testimony dated March 18, 2026 (M. Abramson)
101. Michael Davis, member of the public, written testimony dated March 18, 2026 (M. Davis)
102. Mike Vitolo, Local 79, verbal testimony dated March 18, 2026 (M. Vitolo)
103. Milena Blue Spruce, member of the public, written testimony dated March 17, 2026 (M. Spruce)
104. Nadine Desfosses-hussami, member of the public, written testimony dated March 20, 2026 (N. Desfosses-hussami)
105. Natalia Correa, Greenpoint, written testimony dated March 17, 2026 (N. Correa)
106. Natalie Moore, member of the public, written testimony dated March 18, 2026 (N. Moore)
107. Natalie Soleil, Friends of Fort Greene Park, verbal testimony dated March 18, 2026 (N. Soleil)
108. Neil Sheehan, North Brooklyn Angels, verbal testimony dated March 18, 2026 (N. Sheehan)
109. Nick Shannon, member of the public, written testimony dated March 17, 2026, verbal testimony dated March 18, 2026 (N. Shannon)
110. Orlando Guzman, St. Nick's Alliance, verbal testimony dated March 18, 2026 (O. Guzman)
111. Pablo Morales-Serret, member of the public, written testimony dated March 18, 2026 (P. Morales-Serret)
112. Paul Pullo, member of the public, written testimony dated March 30, 2026 (P. Pullo)

113. Paul Samulski, North Brooklyn Chamber of Commerce, verbal testimony dated March 18, 2026 (P. Samulski)
114. Pedram Mahdavi, member of the public, verbal testimony dated March 18, 2026 (P. Mahdavi)
115. Rafael E. Cestero, Community Preservation Corporation, written testimony dated March 17, 2026 (R. E. Cestero)
116. Rafael Perez, member of the public, verbal testimony dated March 18, 2026 (R. Perez)
117. Rick Kenny, member of the public, written testimony dated March 30, 2026 (R. Kenny)
118. Rishi Chattoo, Local 79, verbal testimony dated March 18, 2026 (R. Chattoo)
119. Robert A Colucci, member of the public, written testimony dated March 25, 2026 (R A. Colucci)
120. Robert Brunotte, Local 79, verbal testimony dated March 18, 2026 (R. Brunotte)
121. Robert Buchanan, North Brooklyn community boathouse, verbal testimony dated March 18, 2026 (R. Buchanan)
122. Salvatore Franchino, member of the public, written testimony dated March 20, 2026 (S. Franchino)
123. Salvatore Franchino, member of the public, verbal testimony dated March 18, 2026 (S. Franchino)
124. Sarah Roberts, Wild Bird Fund, written testimony dated March 30, 2026, verbal testimony dated March 18, 2026 (S. Roberts)
125. Sarah Stansbury, member of the public, written testimony dated March 18, 2026 (S. Stansbury)
126. Scott Fraser, member of the public, written testimony dated March 31, 2026, verbal testimony dated March 18, 2026 (S. Fraser)
127. Scott Short, St. Nick's Alliance CDC, verbal testimony dated March 18, 2026 (S. Short)
128. Sean Cahill, member of the public, written testimony dated March 17, 2026 (S. Cahill)
129. Sean Marrow, NYCHA, verbal testimony dated March 18, 2026 (S. Marrow)
130. Stefania Tomczyk, member of the public, written testimony dated March 21, 2026 (S. Tomczyk)
131. Stephanie Andrews, member of the public, verbal testimony dated March 18, 2026 (S. Andrews)
132. Steve Chesler, Friends of Bushwick Inlet, written testimony dated March 30, 2026, verbal testimony dated March 18, 2026 (S. Chesler)
133. Susan Albrecht, member of the public, written testimony dated March 17, 2026 (S. Albrecht)
134. Sarah Oakes, member of the public, written testimony dated March 18, 2026 (S. Oakes)
135. T. Micalopulos, member of the public, written testimony dated March 18, 2026 (T. Micalopulos)
136. Tom Hameline, member of the public, verbal testimony dated March 18, 2026 (T. Hameline)
137. Tony Olszewski, member of the public, written testimony dated March 30, 2026 (T. Olszewski)
138. Trina McKeever, member of the public, verbal testimony dated March 18, 2026 (T. McKeever)
139. Save the Inlet, written testimony dated March 30, 2026 (Save the Inlet)
140. Veronica Zapasnik, member of the public, written testimony dated March 30, 2026, verbal testimony dated March 18, 2026 (V. Zapasnik)
141. Victoria Alexander, Resilient Red Hook, written testimony dated March 19, 2026 (V. Alexander)
142. Victoria Hagman, Resilient Red Hook, written testimony dated March 26, 2026 (V. Hagman)
143. Vincent Dipietra, Friends of Bushwick Inlet, written testimony dated March 18, 2026 (V. Dipietra)

144. William Meehan, member of the public, written testimony dated March 26, 2026 (W. Meehan)
145. Yee Chow, member of the public, written testimony dated March 20, 2026 (C. Yee)
146. Zoē Raphael, Cómo No, written testimony dated March 18, 2026 (Z. Raphael)
147. Zoe Skoric, member of the public, verbal testimony dated March 18, 2026 (Z. Skoric)

2. Comments and Responses on the DEIS

Comments on the Proposed Project

Process

C.1 The scale of the project has been misrepresented, and clear renderings have not been shared with the community. (M. Giavazzi, A. Odezynska, J. Mraz, B. Bello, S. Chesler)

*Response: The environmental review documents (Draft Scope of Work, Final Scope of Work, DEIS, and FEIS) all include figures that illustrate the overall massing of the proposed buildings, including a representation of the building heights in massing diagrams (see EIS **Chapter 1, Project Description** and **Chapter 8, Urban Design and Visual Resources**), and pedestrian-level views of the development from the surrounding neighborhood (see EIS **Chapter 8, Urban Design and Visual Resources**). All documents are publicly accessible on the Department of City Planning's Zoning Application Portal website.*

C.2 The design was not developed with the community. This site presents a genuinely rare opportunity — publicly owned land at the northern terminus of Bushwick Inlet Park, adjacent to a restored ecology, at a moment when the community is already grappling with the consequences of rapid overdevelopment. Any development that does occur should be developed transparently, in partnership with the community — not imposed upon it. If the museum proposed for this site is truly for the public good, then its site design should be done in public — with the community, not for it. The Community Board Committee that thoroughly reviewed all ULURP details voted against this project, yet the developer bypassed that decision by presenting glossy photos and making promises to special interests at the full Board level, ultimately securing approval. While conditions were attached to that approval, there is no clear accountability or oversight mechanism to ensure those conditions are actually implemented, constructed, or delivered. The process has allowed outside voices — those who stand to gain financially from luxury tower construction — to carry more weight than the residents who actually live in the neighborhood and will be directly affected by this development. (M. Flanagan, M. Spruce, N. Shannon)

Response: This application has followed the public engagement requirements of CEQR, including holding a public scoping meeting on the DSOW (held on April 22, 2025) and a public hearing on the DEIS (held on March 18, 2026). The public had the opportunity to comment on the application at both meetings. Written comments on the Draft Scope of Work (DSOW) were accepted by the lead agency through 5:00 pm on May 2, 2025. Written comments on the DEIS were accepted by the lead agency through 5:00 pm on March 30, 2026. The Applicant also attended a community board meeting on June 10, 2025 to voluntarily present the proposal.

C.3 I oppose the Monitor Point development and urge the Commission to either reject the project outright or require the developer to substantially revise and resubmit a far more

environmentally and community conscious plan, including a more rigorous environmental review before any approvals are granted. (C. Caglioni)

Response: The environmental review for this project was conducted in accordance with guidance in the 2025 CEQR Technical Manual and has been prepared in consultation with the NYC Department of Parks, NYC Department of Transportation (DOT), NYC Landmarks Preservation Commission (LPC), NYC Department of Environmental Protection (DEP), among others.

C.4 Will the board follow up to verify that the promised number of affordable apartments actually gets built after voting for this project? Decision-makers typically never look back to see what happened after voting in favor of a developer. (J. Zdziaszek)

Response: As described in EIS ***Chapter 1, Project Description,*** *it is the Project Developer's intent to pursue Mandatory Inclusionary Housing (MIH) Option 1, under which 25 percent (up to approximately 300) of the proposed units would be affordable at an average of 60 percent Area Median Income (AMI), pursuant to MIH requirements. However, the Project Developer intends to provide the affordable units at an average of 56 percent AMI.*

C.5 Vote no against a public process that actually works to minimize, and is sometimes purposefully manipulated to minimize, critical public interests. (M. Flanagan)

Response: Comment noted.

C.6 The public was given extremely short notice about the hearing, and many people who work during hearing times were unable to testify. The DEIS hearing notice took too long to appear on the City Planning website. Combining the DEIS hearing with the City Planning Commission land use hearing makes it very difficult for the public to understand and respond to, given the complexity of 9 ULURP land use items alongside 20 technical DEIS areas — material that the developer has had whole teams working on for months. (M. Flanagan)

Response: See response to ***C.2****. The DEIS was published on December 12, 2025. Consistent with the requirements of the New York State Environmental Quality Review Act (SEQRA) and CEQR, notice of the public hearing of the DEIS was published on March 2, 2026, and the public hearing was held on March 18, 2026.*[1] *The public hearing was accessible both in-person and remotely via the teleconferencing application Zoom. Following the public hearing, comments on the DEIS were accepted through 5:00 PM, Monday, March 30, 2026, via email and mail. It is the CPC's standard practice to hold the DEIS hearing in conjunction with the CPC's public hearing on the ULURP application.*

Purpose and Need

C.7 The proposed towers do not need to be located on this specific waterfront site, only 80 feet from a unique ecosystem, and in a flood zone that will become increasingly vulnerable due to climate change. This is not how this land was intended to be used. As publicly owned land, this waterfront parcel should prioritize public benefit rather than private development. North Brooklyn needs more open space, and the improvements proposed cannot substitute for meaningful parkland or climate infrastructure, failing to address long-term community needs. The project is an excuse to build luxury apartments under the guise of supporting a museum and affordable housing, and does not benefit New Yorkers or the Greenpoint community. A park was confirmed and promised to the community many years ago. This proposal should not have been on the table for discussion, and it is troubling that a developer persuaded the city

[1] Public notices of the DEIS public hearing were published in *The New York Daily News* on March 2, 2026, the *City Record* on March 3, 2026, and the NYSDEC *Environmental Notice Bulletin* on March 4, 2026.

to consider building on top of a park that was already promised. (C. Caglioni, D. Marker, S. Konekeo, L. Roper, H. Chang, R. Buchanan, M. Spruce, I. Marx, J. Mraz, K. Yourke, C. Kayel, M. Bizzarri, J. Zdziaszek, S. Chesler)

Response: Lot 1, owned by NYCTA, is currently zoned R6 and R6/C2-4, and is currently occupied by the NYCTA Facility, a 71,838-gsf, single-story, pre-existing industrial transit building, which is critical to the operation of the NYC subway system. In 2019, the Project Developer submitted a proposal in response to an RFP issued by the MTA for the redevelopment of Lot 1, which is owned by the NYCTA, an affiliate of the MTA. As discussed in EIS ***Chapter 1, Project Description****, Lot 25 within the Development Site is vacant and owned by the Greenpoint Monitor Museum. While Lot 25 is zoned M3-1 and was identified as a "Park" on a City map, NYC Parks has stated that it does not intend to acquire the property, and it has never been a park. Therefore, this land is not considered to be public land and would not be developed with open space in the future without the Proposed Actions.*

As stated in the "Purpose and Need" section of the EIS ***Chapter 1, Project Description****, the Proposed Actions have been designed to facilitate the comprehensive redevelopment of a nonconforming industrial site, transforming it into a vibrant, mixed-use area with new open space and waterfront access for the public, affordable residential units, new local retail opportunities, and a new community facility element.*

Without a relocation plan or replacement facility to house the NYCTA operations on Lot 1, the site has remained underdeveloped and inconsistent with the residential development trends in the surrounding area. As part of the Proposed Development, the Project Developer has identified a relocation site in the North Brooklyn IBZ in East Williamsburg and would construct a new turnkey facility for the relocation of the NYCTA operations, providing the opportunity for a new development to be constructed on the footprint of the existing NYCTA Facility that would be more aligned with surrounding uses. In its existing condition, the NYCTA Facility creates a barrier between the waterfront and upland neighborhoods, serving as an impediment to the fulfillment of the Greenpoint/Williamsburg Waterfront Access Plan (WAP). No residential development has been achieved on Lot 1 since it was rezoned to allow for residential use almost 20 years ago.

The Proposed Development would replace vacant land and the existing NYCTA Facility, an incompatible industrial use, with new publicly accessible open space, supporting the goals of the Greenpoint-Williamsburg Rezoning by improving waterfront access and connecting area open spaces.

C.8 The community opposes the proposed development and demands the preservation of promised parkland along the waterfront. High-rise buildings are unwanted, and the land should remain as park space as originally committed. The alienation of public parkland for private profit must be rejected, as long-term development leases disproportionately enrich private developers far beyond any benefit returned to the community. (N. Desfosses-Hussami, S. Tomczyk, M. Flanagan, R. Colucci)

Response: Comment noted. See response to ***C.7****.*

C.9 The developer has publicly stated that anything above 40 percent affordability could compromise the project's economic viability—a position that makes the Borough President's own 50 percent condition appear aspirational rather than achievable. When the developer's stated ceiling is below every advisory body's stated floor, the Commission should ask whether the project itself—not just its affordability percentage—is the right approach for this site. (Resilient Red Hook)

Response: Comment noted.

C.10 In relation to 56 Quay Street, the site was transferred from Motiva to the Greenpoint Monitor Museum through a restrictive deed that is directly incompatible with the zoning changes the Applicants seek. The land is meant for non-profit use, and the restrictions run with the land. Does the DCP action need to comply with the deed restrictions? If not, please explain. (Save The Inlet)

Response: 56 Quay Street is subject to a private deed restriction imposed when the land was donated from Motiva to the Greenpoint Monitor Museum, which limits the use of the land to "the establishment of a museum dedicated to preserving the memory of the civil war battleship U.S.S. Monitor and for any other lawful purpose consistent with its charter as a not-for-profit Internal Revenue Service Section 501-3(c) organization." Today, 56 Quay Street is zoned M3-1. This zoning designation is not compatible with the contemplated museum use under the deed restriction because this museum use is not permitted as-of-right in an M3-1 district. The proposed rezoning will allow museum use as-of-right on 56 Quay Street, allowing the Greenpoint Monitor Museum to satisfy the deed restriction and to fulfill the Museum's mission by constructing a museum preserving the memory of the U.S.S. Monitor.

Project Description

C.11 Public land should prioritize 100% affordable housing to address the city's affordability crisis. The site at 40 Quay Street is publicly owned MTA land, and public assets must serve the public good, not private profit. The current proposal, with its overwhelming majority of luxury residential units, betrays this principle. Luxury units do not serve the community, the project steals parkland from residents, and represents an ecological disaster to wildlife that depend on the inlet. Building luxury housing in a 100-year flood zone is irresponsible. As state land, it should be used for the public good and the community. Oppose the rezoning Monitor Point because it steals parkland by requesting the city to remove park designation from an adjoining property to allow high-rise towers. (A. Catchaturyan, R. Colucci, Y. Chow, L. Roper, Resilient Red Hook, L. Celentano, N. Shannon)

*Response: See response to **C.7**. Additionally, as concluded in EIS **Chapter 2, Land Use, Zoning, and Public Policy**, the Proposed Actions would be consistent with the New York City Waterfront Revitalization Plan (WRP).*

C.12 The development project is being misrepresented as affordable housing, when in reality it is for luxury apartments that primarily benefit the developer. The claim that affordable units "keep people in their neighborhood" is false, as housing lottery applicants are drawn from across the entire city with no choice of placement and the odds of selection are extremely slim. There are also serious concerns about whether the promised number of affordable apartments will actually be delivered, as developers have a history of walking back such commitments citing unforeseen circumstances. Sacrificing this important inlet for what amounts to a false sense of affordability is not worth it. (D. Marker, I. Marx, J. Zdziaszek, L. Hofmann)

*Response: As stated in the "Purpose and Need" section of the EIS **Chapter 1, Project Description**, the Proposed Actions have been designed to facilitate the comprehensive redevelopment of a nonconforming industrial site, transforming it into a vibrant, mixed-use area with new open space and waterfront access for the public, affordable residential units, new local retail opportunities, and a new community facility element. The proposed zoning changes would allow an increase in residential density on the Development Site, enabling the development of more housing, including approximately 230 to 345 affordable units, pursuant to MIH requirements (the Project Developer intends to provide approximately 300 affordable units). The Proposed Development would include a mix of market-rate*

housing and affordable units pursuant to MIH requirements. The process and operational practices of the city's affordable housing lottery are beyond the scope of CEQR.

C.13 The neighborhood is already overburdened with more than its fair share of luxury towers, with two more currently on the way. The ongoing construction at the end of Oak and Noble Streets has not even been adequately addressed, and the cumulative impact of all these towers coming in has not been discussed, let alone the Monitor proposal itself. (A. Odezynska)

*Response: As stated in EIS **Chapter 1, Project Description**, the analysis framework assumes a project build year of 2031, meaning it is assumed that the Proposed Development would be complete and operational by that year. The analyses throughout the EIS consider other planned development within the respective study areas that are projected to be completed by the 2031 build year, effectively accounting for the potential cumulative effect of the Proposed Development and these other planned developments. See **Appendix A: No-Build List.***

C.14 Waterfront buildings in Greenpoint are falling apart. There is no point in building new residential buildings if they will also fall apart. The developer cannot guarantee their buildings will not fall apart as well. Developers are only here to develop, and someone who does not live in a building has no reason to care about it. (S. Tomczyk)

Response: Comment noted. The quality of other waterfront developments are beyond the scope of CEQR.

C.15 The development generates only 20,000 square feet of new public open space on the MTA site — the bare minimum required by law, not a community benefit. Of the claimed 50,000 square feet of public open space, 30,000 square feet (60%) are located on the Monitor Museum parcel, land that was already deed-restricted for public use before this application was filed. That space was never Gotham's to give. Gotham is not creating public space — they are borrowing it to maximize building density. The MTA site presents a unique opportunity to develop publicly owned land at a scale that truly works for the people who will use it. (L. Celentano, N. Shannon)

*Response: See response to **C.10**. As set forth in EIS **Chapter 1, Project Description**, the Proposed Actions would add approximately 50,000 square feet (sf) of new open space within the community, 43,000 sf of which would be publicly accessible, including an approximate 34,000-sf Waterfront Public Access Area (WPAA) and 9,000 sf of Public Access Area (PAA) that would enhance connectivity for pedestrians along the waterfront and offer a new neighborhood amenity and provide a monetary contribution to the NYC Parks Department for the maintenance of Bushwick Inlet Park. On Lot 25, the Proposed Actions would facilitate the reconstruction of the deteriorated shoreline with new bulkheads and resiliency improvements. Fulfillment of the Greenpoint/Williamsburg Waterfront Access Plan (WAP) would be facilitated by the relocation of the NYCTA Facility that is currently on Lot 1, which creates a barrier between the waterfront and upland neighborhoods, to a new turnkey facility in the North Brooklyn Industrial Business Zone, delivered by the Project Developer.*

C.16 The DEIS analyzes a project proposing only 25 percent affordability under MIH Option 1, a level both the Borough President and the Community Board have signaled is unacceptable, and does not analyze a 50 percent affordable scenario, a 75 percent affordable scenario (as CB1's Land Use Committee unanimously recommended before being overridden by the full board), or a 100 percent affordable scenario consistent with the Borough President's own Comprehensive Plan standard for public land. As a result, the environmental review is evaluating a project that every advisory body to have considered it has found inadequate on affordability, yet the DEIS treats the developer's preferred 25 percent as the operative

program, even though the Borough President's Comprehensive Plan for Brooklyn establishes that housing on public land should be 100 percent permanently affordable. The DEIS confirms that only 25 percent of units would be affordable under MIH Option 1, and the developer's publicized "40 percent" figure depends on an unfunded HPD financing arrangement for the East Building that is not part of the formal ULURP application. This discrepancy means the DEIS is effectively assessing a project far less affordable than the Borough President's stated standard for public land. (Resilient Red Hook)

Response: The EIS studies the full range of affordability possible consistent with MIH requirements—20 percent to 30 percent. The Applicant's stated intent to consider providing affordability beyond the MIH requirement, at 40 percent, is in response to feedback received from the community and elected officials through the public review process. The ultimate level of affordability will be determined in consultation with the City Council.

C.17 What portion of the open space will be accessible to the public, and what portion will not be, and specify the particular uses of each space, indicating square footage and acreage. Please also specify what amount of the open space will be porous ground, and for the portions that are impermeable, identify their uses and level of impermeability. (Save The Inlet)

*Response: As detailed throughout the EIS, including in EIS **Chapter 1, Project Description,** the Proposed Development would include over an acre of new, waterfront open space (approximately 50,000 sf, or 1.15 acres), 43,000 sf of which would be publicly accessible including 34,000 sf of required WPAA, and approximately 9,000 sf of PAA, that would provide a pedestrian connection between the future Bushwick Inlet Park and the existing Shore Public Walkway to the north of the site and an upland connection between the future Bushwick Inlet Park and West Street. The WPAA would feature native plantings and trees to support biodiversity. The remaining 7,000 sf of open space would be made up of space for museum visitors as well as landscaping and planting areas that have been designed to visually blend and physically connect with the WPAA and PAA spaces. The public realm improvements associated with the Proposed Development are designed to enhance the pedestrian experience and provide the growing community population with a new open space resource. The proposed open space would be privately maintained by the Project Developer and the majority of the space would be publicly-accessible as described above.*

*As detailed in EIS **Chapter 11, Water and Sewer Infrastructure**, Development Site surface area in the With-Action condition would comprise approximately 64,359 sf of roof, 13,362 sf of pavement and walkways, and 12,896 sf of grass and soft scape.*

C.18 Regarding the financial contribution to NYC Parks, please specify if NYC Parks has agreed to make any changes to the existing Bushwick Inlet Park to accommodate the proposed Monitor Point project, and the cost of any such changes. Please identify in detail any portion of Bushwick Inlet Park that would be ripped up if the Monitor Point project is developed, the amount of time the land will be inaccessible to the public, and the rationale for allowing these actions. Please specify the net present value of any contributions the developer will make to NYC Parks, and of any costs to NYC Parks incurred by the proposed development. (Save The Inlet)

*Response: As stated in EIS **Chapter 1, Project Description**, the Project Developer would provide long-term funding, in the amount of $300,000 annually, to the City/NYC Parks for the operation of Bushwick Inlet Park.*

*As stated in EIS **Chapter 18, Construction**, construction of the Proposed Development would not affect public access or utilization of this open space resource. Measures would be implemented to control air*

emissions, dust, noise, and vibration on the construction site to avoid effects on users of the nearby portions of Bushwick Inlet Park. Additionally, overhead protection would be provided for the adjacent park. Therefore, no significant adverse construction impacts to open space are expected.

C.19 While all parties agree that NYC needs more affordable housing, this project fails to meet community needs. Since the 2005 Greenpoint-Williamsburg rezoning, nearly 5,800 housing units have been built on the Greenpoint waterfront (Commercial and West Streets), with 1,800 income-restricted units, and 3,300 more units planned. Community Board 1 has consistently supported growth but specifically requests deeply affordable housing – This project provides none. (Save The Inlet)

*Response: As stated in EIS **Chapter 1, Project Description**, the Project Developer intends to provide approximately 300 units at an average of 56 percent AMI to support low-income New Yorkers.*

C.20 Please explain how this project will be insured, particularly against climate risk. (Save The Inlet)

Response: Comment noted. This is beyond the scope of CEQR.

C.21 Please explain with what economic risks the MTA is taking by retaining ownership of the land. (Save The Inlet)

Response: Comment noted. This is beyond the scope of CEQR.

C.22 Please explain what role the public, and taxpayers, will play in building this project, ensuring this project, and absorbing risks related to any aspect of this project. (Save The Inlet)

Response: Comment noted. This is beyond the scope of CEQR.

C.23 Will tax-exempt financing be used for this project? If so, how much? (Save The Inlet)

Response: Comment noted. This is beyond the scope of CEQR.

C.24 Which programs within the federal, state, and city government will contribute to this project, in what way, and in what amounts? (Save The Inlet)

Response: Comment noted. This is beyond the scope of CEQR.

C.25 The public waterfront access area is narrowed from 40 feet to just 30 feet against a 600-foot-tall building (a height-to-width ratio exceeding 20:1, creating a building wall rather than a public park), and the claimed 45,000 square feet of "new open space" consists mostly of hardscape—street extensions, esplanades, driveways, and narrow landscaped walkways to doorman buildings—rather than actual parkland with athletic fields, play areas, lawns, and gardens. The hardscape pedestrian walkway and nominal patches of grass, which are only used as an informal dog run for high-rise residents, do not count as community amenities or meaningful open space. (M. Szczęsna, D. Thompson, Z. Skoric, H. Yang, A. Hillel-Tuch, M. Davis, D. Funkhouser, G. Williams, N. Shannon, E. Smyk-Fidel, K. Yourke)

Response: Comment noted.

Comments Relating to EIS Analyses

Land Use, Zoning, and Public Policy

C.26 **The site is located just feet from the Bushwick Inlet shoreline and falls within both the 100-year and 500-year flood zones, making it highly vulnerable to storm surge and chronic flooding. As sea levels rise and flash flooding increases in frequency, constructing dense residential towers here would place future residents and infrastructure at serious risk and undermine long-term resiliency planning. Climate experts recommend nature-based strategies — including wetlands, open space, and habitat buffers — to reduce flood impacts. Hard waterfront development directly conflicts with these approaches and diminishes the site's capacity to serve as a public resource.**

Superstorms have already hit North Brooklyn especially hard — during 2012, apartments at North 4th were evacuated, residents felt buildings shake against wind and water, and Greenpoint was thoroughly flooded. Rather than creating a porous, resilient shoreline to mitigate the increasing frequency and violence of climate-driven events, the Monitor Point project would erect a retaining wall and build on a rocky slab that would direct additional storm surge onto neighboring properties.

The water's edge is the ideal location to prioritize green and blue infrastructure for climate resilience, and a deeply unsuitable location for housing. Even accounting for the affordable housing shortage and site elevation, future residents would be surrounded by flooding and failed utilities and infrastructure. This site sits within the floodplain and was promised as a smooth transition from BIP to the surrounding neighborhood — this proposal represents the exact opposite of that commitment. The "Park Portal" from West Street to the waterfront ends at a large staircase suggested to be built outside of MTA property, tearing up a public park that was just recently built. The proposed steel bulkhead around the shoreline will lock it in place, sever the public's connection to the waterfront, amplify wave action, and increase erosion along the adjacent shoreline and newly built tidal marsh. The three massive towers will significantly impact water wave height during extreme storms, as waves will be pushed back by the reinforced buildings with greater force, causing flooding to flow into lower-lying streets and houses on a much larger scale than already predicted. (E. Smyk-Fidel, C. Caglioni, E. Braswell, M. Flanagan, N. Shannon)

*Response: As discussed in **Chapter 1, Project Description,** the Proposed Development would include substantial infrastructure upgrades and open space improvements along the waterfront. The development would include the creation of over an acre of waterfront open space (approximately 50,000 sf or 1.15 acres). This new open space would include a 34,000-sf Waterfront Public Access Area (WPAA), which would provide a pedestrian connection between the future Bushwick Inlet Park and the existing Shore Public Walkway to the north of the site and an upland connection between the future Bushwick Inlet Park and West Street, plus approximately 9,000 sf of Public Access Area (PAA). The remaining 7,000 sf of new open space would consist of open space for museum visitors as well as landscaping and planting areas that have been designed to visually blend and physically connect with the WPAA and PAA spaces. In addition to this new open space, as part of the Proposed Development, long-term funding, in the amount of $300,000 annually, would be provided to the City/New York City Department of Parks and Recreation (NYC Parks) for the operation of Bushwick Inlet Park.*

The Proposed Development and associated public space and waterfront improvements would comply with all applicable zoning regulations, including relevant waterfront zoning and WPAA and PAA guidelines. The Proposed Development would also be designed to comply with the flood-resistant

construction requirements of the NYC Building Code, including Appendix G. Such requirements include locating all mechanical systems and critical infrastructure above the design flood elevation (DFE). Cellar uses will be limited to parking, storage, and other similar uses as permitted by the NYC Building Code. Residential entry points at grade will be protected with flood shields or similar devices to protect against infiltration. The ***New York City Waterfront Revitalization Program Consistency Assessment Form*** *described that the Proposed Actions would not hinder any goals of the City's WRP; specifically, the Development site is suitable for mixed-use development, and the Proposed Development would not worsen flooding conditions on adjacent sites.*

The Proposed Development would comply with applicable NYSDEC and USACE standards, including standards related to waterfront edge design.

C.27 The NYC Waterfront Revitalization Program directs shoreline design to promote ecological health and biodiversity, with natural, complex, sloped areas instead of vertical, hard surfaces. The DEIS proposes an enormous bulkhead, but NYSDEC advises against vertical hard structures like bulkheads and seawalls because they are destructive to coastal ecosystems. Smooth, vertical walls are highly efficient at reflecting wave energy—they direct the energy downward, causing erosion and scour at the wall, and increase the erosion of neighboring shorelines like Bushwick Inlet Park. The FEIS must quantify and assess reflected-wave and scour effects on the Bushwick Inlet Park shoreline and points inland, and propose an alternative design using a living shoreline approach consistent with WRP guidance. (S. Albrecht, D. Funkhouser, L. Goren, K. Yourke, A. Odezynska, E. Jakubassa, M. Kura, E. Smyk-Fidel, H. Yang)

Response: The Proposed Development must satisfy all relevant NYSDEC standards relating to Tidal Wetlands and Protection of Waters permits, and all USACE standards relating to Section 10 and Section 404 permits in connection with shoreline restoration work on Lot 25.

The DCP reviewed the ***New York City Waterfront Revitalization Program Consistency Assessment Form*** *and concurred that the Proposed Actions would not substantially hinder the achievement of WRP policies (WRP# 24-097), including relevant policies related to flooding and erosion control and adjacent properties. Where a proposed action will not have an adverse effect on a WRP policy, the CEQR Technical Manual advises that no further assessment of the proposed action's potential effects on WRP policies is required or necessary. Therefore, an assessment of reflected-wave and scour effects on the Bushwick Inlet Park shoreline and inland points is not included in this environmental review. See also discussion in* **Chapter 9, Natural Resources** *of the EIS.*

C.28 The proposed development at 40 Quay Street/Monitor Point poses serious flood and climate resilience risks. The site sits within a FEMA coastal flood zone, in an area that was historically low-lying wetlands, and is already subject to increased flooding. Deep foundation drilling for a building of this scale, directly adjacent to the newly restored tidal marsh and stabilized shoreline on the Motiva parcel, poses serious risk of destabilizing the riprap, marsh edge, and earthen berm. A steel bulkhead is the opposite of the adaptive, nature-based approach that a site in the floodplain demands, particularly as sea level rise accelerates. Adding thousands of new residential units and increased density to this coastal flood zone, without broader neighborhood-scale resiliency planning, moves the city in the wrong direction and concentrates climate risk rather than reducing it. Bushwick Inlet represents the last opportunity for meaningful flood mitigation on North Brooklyn's overdeveloped waterfront, and this proposal squanders that opportunity by doing the opposite. Locating a large housing project approximately 50 feet from the water's edge within the Hurricane Sandy flood zone and 100-year/500-year flood zones—where storm surges are predicted to exceed those of Hurricane Sandy—raises significant concerns about safety and consistency with the city's

climate preparedness goals. (S. Chesler, M. Szczęsna, L. Treciokas, C. Kantin, Z. Skoric, F. Chilcott, H. Yang, L. Celentano, K. Yourke, B. Bello, A. Catchaturyan, S. Cahill, N. Shannon, S. Fraser)

*Response: The **New York City Waterfront Revitalization Program Consistency Assessment Form** includes an assessment of WRP Policy 6.2, "Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in New York City Panel on Climate Change 2015 Report, Chapter 2: Sea Level Rise and Coastal Storms) into the planning and design of projects in the city's Coastal Zone." The Policy 6.2 assessment found that the Proposed Actions would be consistent with this policy.*

*Several chapters of the EIS address the potential for the Proposed Actions to cause significant adverse impacts due to increased density: **Chapter 3: Socioeconomic Conditions**, **Chapter 4: Community Facilities and Services**, **Chapter 5: Open Space Resources**, and **Chapter 12: Water and Sewer Infrastructure** all found that increased population density from the Proposed Development would not result in significant adverse impacts to those technical areas.*

*As discussed in the response to **C.27**, the waterfront bulkhead design would be designed to satisfy all relevant NYSDEC standards relating to Tidal Wetlands and Protection of Waters permits, and all USACE standards relating to Section 10 and Section 404 permits in connection with shoreline restoration work on Lot 25.*

C.29 To safely build housing, the coastline must be utilized as a buffer zone of resilient parkland and open space that can withstand flooding and act as a protective barrier, developed with natural and engineered defenses that resist or absorb floodwaters to protect the waterfront and the communities behind it. Resiliency must be coordinated and cohesive, not implemented project by project as a patchwork. It is disingenuous to claim that individual buildings can be built to "resiliency standards," as a single elevated building or group of buildings will redirect floodwaters to the community behind it. The proposed steel bulkhead/seawall will lock the shoreline in place for the next century, amplify wave action, increase erosion along the adjacent shoreline, sever the natural relationship between the upland and tidal inlet, and force floodwaters further inland into the surrounding neighborhood. The site is within the 100-year and 500-year flood zones, just feet from the Bushwick Inlet shoreline, making it highly vulnerable to storm surge and flooding. Rather than creating a porous, resilient shoreline, the Monitor Point project would construct a retaining wall and build apartments on a rocky slab that would direct additional storm surge to neighboring properties. Even with elevation at the site, proposed future residents would be surrounded by flooding and flooded utilities and infrastructure. Building dense residential towers here would undermine long-term resiliency planning. (C. Caglioni, E. Braswell, M. Flanagan, N. Shannon, L. Goren)

*Response: See response to **C.28**. The resiliency of other projects is beyond the scope of this environmental review.*

C.30 WRP policy requires analysis over the project's usable life, and the FEIS must look past 2080 to analyze 2100 and 2150 conditions. (K. Yourke)

Response: The WRP appropriately analyzed the Proposed Development in accordance with CEQR Technical Manual guidance. Further analysis is not warranted under CEQR guidance.

C.31 The site is located within both the 100-year and 500-year flood zones, making it highly vulnerable to storm surges and extreme weather events. Building a large development in this

flood-prone area directly conflicts with the implementation of nature-based flood defenses that would provide better protection for the entire neighborhood. (R. Colucci)

*Response: Comment noted. See response to **C.28**.*

C.32 The Monitor Point project contradicts the rationale for creating the current R6 zoning on the Development Site. The 2005 rezoning established R6 zoning—a medium-density district with a maximum FAR of 2.54 (3.05 with UAP)—as the appropriate scale for this site, precisely because of its location 50 feet from the water's edge adjacent to Bushwick Inlet Park. The current proposal seeks to nearly triple the FAR to 7.2 in an R8 district. Characterizing a radical upzoning as a "fulfilment" of the 2005 vision is inaccurate—it is a fundamental departure from the scale, density, and community expectations established twenty years ago. (Resilient Red Hook, S. Chesler)

*Response: As described in **Chapter 2, Land Use, Zoning, and Public Policy**, the Applicants are seeking R8 zoning with MIH to increase the site's capacity for residential development, specifically affordable housing. The proposed zoning at the Development Site would make it feasible to develop residential uses including affordable housing, which would not occur in the No-Action condition under existing zoning. In conjunction with the other Proposed Actions, the proposed zoning text amendment for MIH would expand the potential for affordable housing on the Development Site. Affordable housing is voluntary through UAP in the existing R6 district, which is only mapped on Lot 1. By mapping MIH on both Lot 1 and Lot 25, additional and permanent affordability will be ensured on the Development Site, resulting in up to approximately 300 new affordable units.*

C.33 The DEIS states that the site is in the 1.0% annual chance floodplain and includes resiliency measures such as a new bulkhead, wet and dry floodproofing, and green infrastructure. However, the DEIS does not address a critical environmental justice concern: the affordable housing tower (East Building, 21 stories) is sited at grade while the market-rate luxury towers are elevated on a shared podium. This design choice effectively transfers flood risk to the residents who can least afford it. The Commission should require: 1. Stormwater modeling incorporating post-2021 extreme rainfall events and NPCC climate projections for the 2050s and 2080s. 2. Equivalent flood protection for the affordable tower as for the market-rate towers—no differential flood risk based on income. (Resilient Red Hook)

*Response: As stated in EIS **Appendix B: WRP**, both residential ground floors and lobbies would be located above the DFE. As described in the WRP documentation, the cellar level would not contain any critical equipment. The DFE for residential uses would be +17 feet (NAVD88). The residential ground floor and lobby for both buildings would be located at this elevation with non-critical residential back-of-house uses including storage and mail room. In the West Building, all critical MEP equipment would be located either on the ground floor or at the mezzanine level at an elevation of +27 feet (NAVD88). MEP equipment is considered a critical feature pursuant to Policy 6.2, and it would be protected via floodproofing measures described in further detail below. These measures would include elevating equipment, wet and dry floodproofing of spaces, and utilizing flood-damage resistant materials, in alignment with Appendix G (Flood-Resistant Construction) of the NYC Building Code. The main residential lobbies of both the Western and Eastern buildings (Building 1 and Building 2) are located at elevation +17 feet (NAVD88), which is above the DFE. These lobbies are accessed via lower lobbies at the Quay Street level (approximately +9 NAVD88). The lower lobbies shall be wet floodproofed per Appendix G 304.1.1. To comply with code requirements, building egress will be provided to a level that is above the DFE and/or complies with Appendix G floodproofing standards.*

C.34 Building 1,150 units of housing in NYC Evacuation Zone 1 should require an evacuation plan. (Save The Inlet)

Response: Comment noted. The CEQR Technical Manual does not require, nor contain guidance for, preparation of such a plan.

C.35 Which floors of each building in the proposed development, if any, are considered "subject to flooding" under New York City's Building Codes, and what restrictions on their use are planned? (Save The Inlet)

*Response: See response to **C.33**.*

C.36 Explain the rationale for placing underground parking on a Zone 1 floodplain, and the flood evacuation plan for that space. (Save The Inlet)

*Response: As stated in EIS **Appendix B: WRP**, the proposed parking garage entrance would be located at +9 feet (NAVD88), descending to a cellar level at an elevation of +0 feet (NAVD88). The cellar level would be considered a vulnerable feature and would not contain any critical equipment.*

C.37 Regarding the WRP: Please explain what work has been done to assess the impact of this proposed development on the resiliency and flood protection for the surrounding community. Please include within that not only possible future floods, but storm surges and changes in the water table. Please indicate the size of the surrounding community included in any such assessments – both the distance from the site covered and the number of people living within the area.

Please provide information on how any water blocked from Monitor Point's luxury tower by the bulkhead and podium is expected to flow. We are concerned that the bulkhead could amplify wave action, increase erosion along the adjacent shoreline, and sever the natural relationship between the upland and the tidal inlet. If you disagree with these ideas, please explain why.

Provide any assessment concerning the impact of this upzoning on water events within the half mile study zone, including Bushwick Inlet, the existing buildings and planned buildings that can be built as of right, the MTA tunnels through Greenpoint and Williamsburg, and the Greenpoint Avenue and Nassau Street subway stations.

If the answer to any of these questions is that such work has not been done, please explain the rationale. (Save the Inlet)

Response: The WRP assessment was conducted in accordance with CEQR Technical Manual guidance. The findings of the assessment indicate that the Proposed Actions are consistent with the WRP and, consistent with CEQR Technical Manual guidance, no further assessment of the Proposed Actions' potential effects on a WRP policy is required or necessary.

C.38 The Applicants have not adequately addressed the "well-suited" and "appropriate coastal zone" portion of the siting requirements. While the Applicants acknowledge the land they hope to build on is both adjacent to and partially within Community Board 1's only "recognized ecological complex" that should be protected, placing luxury towers on the land is not a solution that makes any sense. The Applicants plan to fortify this parcel without adequately internalizing the cost to the people and natural resources around it. (Save The Inlet)

Response: The WRP assessment was conducted in accordance with CEQR Technical Manual guidance. Moreover, as detailed in the WRP, the Development Site is located in close proximity to existing and

planned mixed-use development and open space uses, including at the adjoining property to the north. The Proposed Development would be facilitated by the relocation of the existing NYCTA Facility on the Development Site, which is a non-conforming industrial use that currently blocks public access to the waterfront. The Proposed Development would, therefore, open up public access to the waterfront. Additionally, as detailed in EIS ***Appendix B: WRP****, the Development Site is also well-served by transit, open space, and existing water and sewer infrastructure. Accordingly, the Proposed Development achieves conformance with NYC WRP Policy1.2: Encourage non-industrial development with uses and design features that enliven the waterfront and attract the public and Policy 1.3: Encourage redevelopment in the Coastal Zone where public facilities and infrastructure are adequate or will be developed.*

As described in ***Chapter 9, Natural Resources*** *regarding the Bushwick Inlet Recognized Environmental Complex (REC), the Applicant is undertaking extensive shoreline restoration as part of the proposed waterfront open space, including shoreline stabilization to address existing erosion and sedimentation impacts to Bushwick Inlet, as well as habitat restoration and establishment. In contrast to the current dominance and proliferation of non-native/invasive plant species at the Development Site under existing conditions, the planting plan for the Proposed Development includes the installation of native tree, shrub, and herbaceous plant species that occur in New York coastal habitats. The native plants would be installed within proposed habitat zones along the waterfront and in landward areas of the Development Site, including Lot 1, which is currently completely devoid of vegetation due to the presence of the existing MTA Facility. In accordance with key habitat restoration-based design features identified in relevant NYC waterfront plans, including the* Bronx River Intermunicipal Watershed Management Plan Update *(Bronx River Alliance, 2024) and the* Jamaica Bay Watershed Protection Plan, Volume II *(NYCDEP, 2007), the proposed habitat zones include lowland and upland maritime shrub and grass habitats that would mimic the native plant associations and ecologies that occur in undisturbed shoreline habitats in local coastal areas, including those currently being installed by NYC Parks as part of habitat restoration efforts at the Motiva Parcel of Bushwick Inlet Park, located to the south of the Development Site and within the Bushwick Inlet REC. The proposed waterfront habitats would provide a vegetative buffer between the proposed buildings and hardscape and the adjacent shoreline and tidal wetland habitats of Bushwick Inlet.*

C.39 We are concerned that the applicant's response to the policy guidelines to protect natural resources are not detailed enough in how the proposed project will impact the area. (Save The Inlet)

Response: The WRP and Natural Resources assessments conducted for the EIS were in accordance with CEQR Technical Manual guidance.

C.40 How can the Applicants reconcile the plan to place an enormous podium that spans over 60% of the Monitor Point footprint, creating a hardened landscape abutting the narrow 50' wide Bushwick Inlet Park with this obligation to protect the groundwater? Save the Inlet contends the abundant hardscape in the design is counter to goals of the Waterfront Revitalization Plan which emphasizes nature-based designs. (Save The Inlet)

Response: As described in ***Chapter 9, Natural Resources****, implementation of the Proposed Development would not result in a change in impervious surface coverage at the Development Site and the removal of existing habitats and vegetation at the Development Site is not expected to result in significant adverse effects to local vegetated habitat abundance, native plant diversity, or individual plant species populations.*

Moreover, the Proposed Development would facilitate the removal of the non-native/invasive tree, shrub, woody vine, and herbaceous plants that currently dominate the existing Development Site flora and serve as a seed source for the spread of these species to other adjoining and nearby properties surrounding Bushwick Inlet, including the Motiva Parcels of Bushwick Inlet Park, where habitat restoration efforts to establish new native plant communities are currently underway. Significantly, the planting plan for the Proposed Development includes installations of native tree, shrub, and herbaceous plant species that occur in New York coastal habitats within proposed habitat zones along the waterfront and in landward areas of the Development Site, including Lot 1, which is currently completely devoid of vegetation due to the presence of the existing NYCTA Facility. The proposed nature-based design of the habitat zones include lowland and upland maritime shrub and grass habitats that would mimic the native plant associations and ecologies occurring in undisturbed shoreline habitats in local coastal areas, including those currently being installed at the Motiva Parcel.

*With respect to protection of groundwater, as described in **Chapter 10, Hazardous Materials**, implementation of the Proposed Actions would facilitate groundwater protection, as it includes the remediation of existing soil and groundwater contamination beneath the Development Site, thereby helping to prevent future contamination of tidal habitats within Bushwick Inlet. The Proposed Actions would adhere to requirements of the existing (E)-Designation for hazardous materials (E-138), which was applied to Brooklyn Block 2590, Lots 1 and 25 as part of the 2005 Greenpoint-Williamsburg Rezoning. Additionally, the Project Developer has submitted an application to enroll the Lot 1 portion of the Development Site into the NYSDEC BCP. The implementation of remedial measures required under the (E)-Designation or the NYSDEC BCP would preclude the potential for significant adverse hazardous materials impacts due to the Proposed Actions.*

C.41 Building Monitor Point in a flood zone goes against New York State's and City's own recommended policies. New York State issued revised FEMA assessment in 2025 (found here: NYSClimateimpacts.org). The new assessment predicts the sea-level in the Bushwick Inlet will be 23" higher by 2050, less than 20 years from the proposed build date of this project. The assessment strongly recommends that publicly owned properties on climate risk waterfront should not be developed into residential housing. (Save The Inlet)

*Response: See response to **C.28**. The proposed development at 40 Quay Street/Monitor Point poses serious flood and climate resilience risks. The site sits within a FEMA coastal flood zone, in an area that was historically low-lying wetlands, and is already subject to increased flooding. Deep foundation drilling for a building of this scale, directly adjacent to the newly restored tidal marsh and stabilized shoreline on the Motiva parcel, poses serious risk of destabilizing the riprap, marsh edge, and earthen berm. A steel bulkhead is the opposite of the adaptive, nature-based approach that a site in the floodplain demands, particularly as sea level rise accelerates. Adding thousands of new residential units and increased density to this coastal flood zone, without broader neighborhood-scale resiliency planning, moves the city in the wrong direction and concentrates climate risk rather than reducing it. Bushwick Inlet represents the last opportunity for meaningful flood mitigation on North Brooklyn's overdeveloped waterfront, and this proposal squanders that opportunity by doing the opposite. Locating a large housing project approximately 50 feet from the water's edge within the Hurricane Sandy flood zone and 100-year/500-year flood zones—where storm surges are predicted to exceed those of Hurricane Sandy—raises significant concerns about safety and consistency with the city's climate preparedness goals. (S. Chesler, M. Szczęsna, L. Treciokas, C. Kantin, Z. Skoric, F. Chilcott, H. Yang, L. Celentano, K. Yourke, B. Bello, A. Catchaturyan, S. Cahill, N. Shannon, S. Fraser).*

Socioeconomic Conditions

C.42 The Monitor Point project will accelerate displacement and contribute to rising rents throughout Greenpoint and Williamsburg, which already has some of the highest rents in the city. Nearly 1,200 units, most of which will be luxury apartments, will be added with no infrastructure upgrades to support the increased density, and may lead to many more towers being planned in the area. (V. Dipietra)

*Response: The potential for the Proposed Development to result in indirect residential displacement as a result of changes in socioeconomic conditions, such as an increase in rents, was assessed in **Chapter 3, Socioeconomic Conditions**. Following the methodology outlined in the CEQR Technical Manual, the preliminary assessment of indirect residential displacement concluded that the Proposed Actions would introduce a population with similar or lower incomes than the average incomes of the study area, and the increase in population did not meet the threshold for requiring a detailed analysis. Therefore, the Proposed Actions are not expected to significantly alter socioeconomic conditions in the study area.*

*Regarding infrastructure upgrades, the Proposed Development would include substantial infrastructure upgrades and open space improvements along the waterfront as discussed in **Chapter 1, Project Description**.*

C.43 Displacement has happened, and the community has engaged in years of planning that should not be destroyed by a massive 65-story residential tower. (L. Hofmann)

Response: Comment noted. The CEQR Technical Manual requires an examination of the socioeconomic changes a proposed action might cause when compared to the future without the proposed action. The analyses of anticipated socioeconomic impacts resulting from the Proposed Actions were prepared in accordance with the guidance of the 2025 CEQR Technical Manual.

C.44 Building luxury high rises will overwhelmingly raise the market value of the neighborhood even more. A smaller building can still have affordable housing units without having this negative socioeconomic impact on the surrounding area. (M. Spruce)

*Response: See response to **C.42** and **C.43**. As stated in **Chapter 3, Socioeconomic Conditions**, the Proposed Actions would introduce a population with similar or lower incomes compared to the average incomes of the existing population in the study area and, therefore, would not be expected to significantly alter socioeconomic conditions in the study area.*

C.45 Adding nearly 3,000 new residents from mostly the highest economic strata will only increase downward economic pressure on working people. 10,000 new apartments added to the local housing supply along the Williamsburg and Greenpoint waterfronts, mostly luxury market rate, has not lowered rents. (S. Chesler)

*Response: See response to **C.43** and **C.44**. The analysis of socioeconomic conditions has been conducted in accordance with CEQR Technical Manual guidance. In January 2023, Governor Hochul announced the New York Housing Compact, a comprehensive, multi-pronged strategy to address New York's housing crisis. The plan seeks to build 800,000 new homes over the next decade and enhance support for renters and homeowners. It establishes incentives for local governments, including New York City, to produce more housing in every community, and promotes additional residential development in areas with existing transit access. Governor Hochul's initiative recognizes that the construction of new housing is a State priority that will reduce the pressure on rents, as regional supply of housing increases to meet the regional demand for housing. New York State Executive Order 30, dated July 18, 2023, directs State agencies, authorities, and entities, such as MTA, to review or collaborate in the review of*

any parcels of developed and undeveloped land under their ownership and control to identify potential sites for housing development and to determine if any such parcels could be used to aid housing development on adjacent or nearby parcels. The Executive Order states that such review shall include parcels owned and controlled by the Metropolitan Transportation Authority or any of its subsidiaries.

C.46 The proposal would introduce roughly 1,200 predominantly luxury units (approximately 700 market-rate units) into an already overbuilt neighborhood where rents have soared over 60% since 2020 and average one-bedroom rents rose nearly 40%—double the citywide average—in the district with the most new housing built. The 700 luxury units set the rent precedent for the entire neighborhood, with current listings of neighboring luxury towers showing two- to three-bedroom units renting for $9,000 to $16,000 per month, and when the bulk of new housing is luxury and higher in rent than the existing median rent, the median rent goes up, particularly for families who cannot fit into an "affordable" studio. The project's scale would raise the neighborhood's Area Median Income (AMI), ultimately making housing less affordable for existing residents and accelerating displacement, while development like this gentrifies communities by raising prices on rent, property taxes for local homeowners, and groceries, bankrupting more affordable options and local ownership as local bookshops, art supply stores, toy stores, cinemas, elderly community centers, preschools, and after-school programs disappear, replaced by designer coffee shops, niche luxury retail, and designer doggy daycare—once local ownership leaves communities, statistically it never comes back. Using "affordable housing" units as an excuse for building additional luxury units is deceptive because as the cost of living continues to rise, affordable housing residents cannot afford to live, shop, and exist amid these other rising costs, and the investment into the neighborhood will not go back into the community but will create more money for the CEOs of large corporations while most of this housing serves wealthy people, many of whom do not even live in New York full-time or contribute to the community. (J. Beckwith, M. Spruce, M. Giavazzi, J. Gilbert-Davis, M. Bohk, K. Gottbrecht, A. Catchaturyan, I. Marx, J. Pietromonaco, N. Correa, S. Stansbury, Z. Skoric, Z. Raphael, B. O'dea, V. Zapasnik)

*Response: See response to **C.43** and **C.44**. The analysis of socioeconomic conditions has been conducted in accordance with CEQR Technical Manual guidance.*

C.47 The continued construction of luxury towers is pushing out long-term residents by failing to provide affordable and reasonably sized housing options, particularly units suited to older residents and families who need more space at affordable prices. These towers are a blight on the neighborhood, driving up the cost of living and making the area unaffordable for middle-income residents who already call Greenpoint home. While supporters frame such projects as solutions to the housing crisis, their scale, location, and housing model risk repeating the same patterns that have already made Greenpoint and Williamsburg less affordable and less resilient. (M. Bizzarri, J. Beckwith, C. Caglioni)

*Response: See response to **C.43** and **C.44**. The analysis of socioeconomic conditions has been conducted in accordance with CEQR Technical Manual guidance.*

C.48 Rents in Greenpoint have soared over 60% since 2020 due to enormous, out-of-scale luxury high-rise buildings. Using "affordable housing" units as justification for building additional luxury units is deceptive, as rising costs of living make it impossible for affordable housing residents to afford to live, shop, and exist in the neighborhood. Rent is already so insanely expensive, and this development will only increase it further, contributing to pricing out even more people from this already overdeveloped neighborhood. (I. Marx, M. Spruce, S. Konekeo)

*Response: See response to **C.43** and **C.44**. The analysis of socioeconomic conditions has been conducted in accordance with CEQR Technical Manual guidance.*

C.49 The project relies primarily on market-rate luxury housing, a model that has repeatedly failed to improve affordability in the neighborhood. While the proposal includes 40% affordable units, the majority would remain market-rate, continuing a development pattern that prioritizes high-income households over existing residents. (C. Caglioni)

*Response: See response to **C.43** and **C.44**. The analysis of socioeconomic conditions has been conducted in accordance with CEQR Technical Manual guidance.*

C.50 The DEIS does not analyze the three-phase displacement dynamics that documented research shows are predictable consequences of waterfront upzoning: pre-rezoning gentrification, a speculation/announcement phase, and a post-development maturity phase. In Williamsburg, median rents jumped approximately 222% in the four years after the 2005 rezoning. In Gowanus, they rose approximately 40% in four years after the 2021 rezoning. The CEQR methodology's reliance on average income comparison fails to capture these dynamics—and the DEIS makes no effort to supplement the standard methodology with a rezoning-specific rent and displacement analysis. (Resilient Red Hook)

*Response: Comment noted. See responses to **C.43** and **C.44**.*

C.51 The DEIS fails to analyze the cumulative displacement burden on Community District 1, which has absorbed nearly 30,000 new apartments since 2010—more than any other district in the city—while losing more than 15,000 Latino residents. A project that introduces 850 market-rate luxury units into this context cannot credibly be assessed as having no socioeconomic impact. The Commission should require: 1. A rezoning-specific rent and displacement analysis using the three-phase waterfront framework and historical comparables from Williamsburg, Gowanus, and Long Island City. 2. An environmental justice analysis evaluating cumulative displacement burdens on CB1 since 2005, including demographic change, rent escalation, and small business turnover. (Resilient Red Hook)

*Response: See response to **C.43** and **C.44**. The analysis of socioeconomic conditions has been conducted in accordance with CEQR Technical Manual guidance. Additionally, Section 4 of this project's **Racial Equity Report** explains how the Proposed Development would further fair housing and promote equitable access to opportunity, consistent with specific goals of the Where We Live NYC fair housing plan.*

C.52 This analysis is designed to produce a predetermined conclusion. The DEIS uses a half-mile study area where median household income is $141,735 and median rent is $2,819—figures that reflect two decades of post-rezoning gentrification. By measuring the new population against an already-gentrified baseline, the analysis mechanically concludes "no impact," regardless of the project's actual displacement effects on remaining lower-income and rent-stabilized tenants. (Resilient Red Hook)

*Response: See response to **C.43** and **C.44**. The analysis of socioeconomic conditions has been conducted in accordance with CEQR Technical Manual guidance.*

Community Facilities and Services

C.53 The proposed development fails to adequately account for the strain it will place on local schools and community facilities. Classrooms now have caps on student enrollment, meaning schools cannot simply absorb an unlimited number of new students. The planned Dupont

Street school, with a capacity of only 400+ students, is intended to serve children already living in the neighborhood, not the future influx of new residents. If people moving into these proposed buildings have children, there are no schools with sufficient capacity to accommodate them. The proposal does not adequately address infrastructure and community capacity, as local schools and community services are already operating at or near capacity. The addition of more than 1,200 to nearly 2,800 new residents would overwhelm public schools, healthcare facilities, childcare services, and neighborhood amenities, none of which can absorb this level of growth without major investment. Little to no evidence has been provided that these challenges have been sufficiently considered or mitigated. (J. Zdziaszek, C. Caglioni, J. Pietromonaco)

Response: The EIS's community facility analysis, prepared in accordance with the 2025 CEQR Technical Manual, evaluates how the Proposed Actions may affect the services delivered by a community facility, as might happen if a facility is already overutilized, or if a project is large enough to create a demand that could not be met by the existing facility. 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.

*As described in the **Final Scope of Work (FSOW)**, the Proposed Actions would not displace any existing community facilities and services, nor would they affect the physical operations of or access to and from any police or fire stations or health care facilities. As such, in accordance with CEQR Technical Manual Guidance, the Proposed Actions would not result in any direct effects on community facilities. Additionally, per CEQR Technical Manual guidance, an assessment of impacts on police/fire services and health care facilities is not warranted as the Proposed Development would not result in the introduction of a sizeable new neighborhood.*

*As shown in **Chapter 4, Community Facilities and Services**, the EIS includes an indirect community facilities assessment for public schools, libraries, and early childhood programs, which are density-related analyses focused on the development anticipated at the Development Site.*

Public Schools

*As shown in **Table 4-3** (Projected Public School Enrollment, Capacity, and Utilization for With-Action Condition, School District 14, Subdistrict 3) of **Chapter 4, Community Facilities and Services** of the EIS, the collective utilization rate for public elementary and intermediate schools would be below 100 percent. Therefore, in accordance with CEQR Technical Manual guidance, the Proposed Actions would not result in a significant adverse impact to elementary or intermediate schools.*

*Additionally, as described in **Chapter 4, Community Facilities and Services**, the introduction of 1,150 DUs in Brooklyn School District 14, Subdistrict 3, where the Development Site is located, would introduce approximately 58 high school students, which falls below the CEQR Technical Manual threshold of 150 students for a public high schools analysis.*

Early Childhood Programs

*As shown in **Table 4-8** (With-Action Condition Estimated Publicly Funded Child Care Center Enrollment, Capacity and Utilization) of **Chapter 4, Community Facilities and Services** of the EIS, the collective utilization rate for early childhood program facilities would be below 100 percent and the change in utilization between the No-Action and With-Action conditions would be below 5 percent. Therefore, in accordance with CEQR Technical Manual guidance, the Proposed Actions would not result in a significant adverse impact to early childhood programs.*

Libraries

*As shown in **Table 4-14** (With-Action Condition Public Library Catchment Area Population and Holdings) of **Chapter 4, Community Facilities and Services** of the EIS, between the No-Action and With-Action conditions the library catchment area population would increase by 3.19 percent, which falls below the CEQR Technical Manual impact threshold of 5% for a libraries impact. Therefore, in accordance with CEQR Technical Manual guidance, the Proposed Actions would not result in a significant adverse impact to libraries.*

*Based on the foregoing, and as stated in **Chapter 4, Community Facilities and Services**, the Proposed Actions would not result in significant adverse impacts to community facilities and further analysis is not required.*

C.54 The public benefits offered are limited and disproportionate. While the project includes open space and a waterfront connection, it would also introduce roughly 1,100 new housing units—bringing thousands of new residents—without major commitments to expand transit capacity, schools, or healthcare infrastructure. This is density without corresponding support. (F. Chilcott)

*Response: Refer to Response to **C.53** above. **Chapter 12, Transportation**, of the EIS describes the transit findings. As described therein, the Proposed Actions would not result in impacts to transit (subway and bus).*

*Further, **Chapter 4, Community Facilities** describes that the new student population would not result in a significant adverse impact pursuant to CEQR. Additionally, the CEQR Technical Manual guidance related to healthcare facilities indicates that "Health care facilities include public, proprietary, and non-profit facilities that accept public funds (usually in the form of Medicare and Medicaid reimbursements) and that are available to any member of the community. Generally, a detailed assessment of service delivery is conducted only if a proposed project would affect the physical operations of, or access to and from, a hospital or a public health clinic (see Section 210 of the CEQR Technical Manual) or where a proposed project would create a sizeable new neighborhood where none existed before." As the Proposed Development does not meet these criteria, an analysis was not required under CEQR guidance.*

C.55 The neighborhood lacks the necessary infrastructure to support the influx of new residents that a large residential building would bring. There are insufficient transportation options, grocery stores, and schools to accommodate the growth. Overcrowding in Greenpoint would result, ultimately making it an undesirable place to live. (E. Delora)

*Response: Refer to Response to **C.53** above.*

Open Space

C.56 The community has already absorbed more than its fair share of development burden, and is being asked to accept yet another 3,000 units impacting the park. Residents must continually endure environmental hazards from nonstop construction that affects the air they breathe. This is not simply about construction inconveniences, and the community is not opposed to new neighbors, but the cumulative impact on open space and the environment has exceeded what is fair to bear. (A. Odezynska)

Response: According to CEQR Technical Manual guidance, the adequacy of open space in the residential open space study area is based on ratio of usable open space acreage to the study area

*population (the open space ratio [OSR]). As described in the **Methodology** section of **Chapter 5, Open Space** of the EIS, the residential study area population for the With-Action condition was determined by adding the incremental number of residents from the Proposed Development to the residential population in the No-Action condition, which includes the existing population and the expected new population introduced from development within the study area that would be completed by the analysis year of 2031. As such, the impacts of nearby development on the study area's OSR have been disclosed in the EIS open space analysis.*

As *described* in *EIS **Chapter 18, Construction**, the results of the on-site construction air quality assessment indicate that the Proposed Development would not exceed the applicable air quality standards and de minimis criteria. The off-site dispersion modeling analysis determined that particulate matter ($PM_{2.5}$), and carbon monoxide (CO) concentrations would be below their corresponding de minimis thresholds or National Air Quality Ambient Standards (NAAQS), respectively.*

C.57 Greenpoint-Williamsburg has just 0.6 acres of open space per 1,000 residents—less than a quarter of the city's 2.5 acres/1,000 standard, making it one of the worst-served neighborhoods in the city, with less than 15% tree canopy and existing parks already overcrowded. The project will add approximately 2,795 residents and reduce the active open-space ratio by 8.1% (from 1.07 to 0.98 acres per 1,000 residents), yet the DEIS claims no significant adverse impact while the EAS downplays this decline from an already unacceptably low level that exceeds CEQR's 5% threshold for significant adverse impacts. (D. Thompson, Z. Skoric, H. Yang, A. Hillel-Tuch, M. Davis, D. Funkhouser, G. Williams, N. Shannon, E. Smyk-Fidel, K. Yourke, J. Rasmussen, C. Kayel, E. Carroll, Save The Inlet)

Response: The EIS's *open space analysis, prepared in accordance with the CEQR Technical Manual, evaluates both the quantitative change in OSR and the qualitative adequacy and usability of open space within the study area. The ratio of 2.5 acres of public open space per 1,000 residents is the City's planning goal; it does not define the residential capacity or set a residential limit to a study area or a public open space. As shown in **Table 5-10** (Open Space Ratios Summary) of **Chapter 5, Open Space** of the* EIS*, between the No Action and With-Action conditions the total OSR would decrease by 7.7 percent from 2.88 acres per 1,000 residents to 2.66 acres per 1,000 residents. In accordance with CEQR Technical Manual guidance, where the total OSR is 2.01 or greater, a reduction of more than 5 percent indicates the possibility for open space impact and,* therefore, serves as a threshold requiring further qualitative assessment of open space adequacy. *A*s indicated *on* page 7-18 of the CEQR Technical Manual:

*"The City's optimal open space ratios and percentage reduction, as shown in CEQR Technical Manual 7-5, **do not constitute an absolute impact threshold**. Projects that may result in significant quantitative impacts on open space are typically further assessed in the qualitative assessment approach to determine the overall significance of the impact."*

Accordingly, the qualitative assessment was conducted in accordance with the CEQR Technical Manual. The Development Site is in a Walk-to-a Park Service Area, meaning the current and future residents are within walking distance of a public park. While the residential study area's passive and total OSRs would decrease by more than 5 percent, passive and total OSRs would remain well above the City's planning goals of 0.50 and 2.50 acres per 1,000 residents, respectively. The active OSR would remain below the City's planning goal, as in the existing and No-Action condition. However, the Proposed Actions would introduce new open space that would contribute to a larger connected open space network that would support active recreation within the study area. The new open space created by the Proposed Development would provide opportunities for active recreation such as walking and jogging

from points north and south along the waterfront. Study area residents would also have access to active open space resources that are outside of the study area but within walking distance, including Ericsson Playground and walking/jogging paths at North 5th Street Pier and Park.

Additionally, the CEQR Technical Manual recognizes that private onsite open space and indoor amenities typically satisfy some of the open space and recreational demand generated by a project. The Proposed Actions would introduce approximately 43,000 square feet of new publicly accessible open space at the Development Site and 18,000 sf of private terrace space. Therefore, considering both the quantitative and qualitative assessment, the Proposed Actions would not result in significant adverse impact to open space.

C.58 The EAS counts a 25,000 sf off-site addition as "mitigation" while glossing over the net loss of open space compared to a no-rezoning scenario, and suggesting that payments to NYC Parks satisfy open space needs is unacceptable since maintenance funding does not create new public park space—the FEIS must evaluate adequacy based on real publicly accessible space, not financial contributions or private amenities for tenants. (D. Thompson, Z. Skoric, A. Hillel-Tuch, M. Davis, H. Yang, D. Funkhouser, G. Williams, N. Shannon, E. Smyk-Fidel, K. Yourke)

*Response: See response to **C.57**. As stated in page 7-19 of the CEQR Technical Manual, measures to mitigate any potential impacts are identified if the proposed project results in a significant adverse open space impact. EIS **Chapter 5, Open Space** determined that the Proposed Actions would not result in a significant adverse significant open space impact, following the guidance in the quantitative and qualitative assessment approaches for open space provided in the CEQR Technical Manual. As there are no significant adverse impacts identified relating to open space, including from project-generated shadows, mitigation measures are not warranted.*

C.59 Greenpoint-Williamsburg already suffers from a severe deficit of open space, with only 0.6 acres per 1,000 residents—significantly below the city average of 1.8 acres and the recommended 2.5 acres—and the Monitor Point project will further intensify this shortage by introducing nearly 3,000 new residents while providing only zoning-mandated upland connectors and hardscaped waterfront access areas rather than genuine parkland with recreational facilities. The plan will take away existing parkland, narrow the public waterfront, and place massive towers directly alongside what would otherwise remain open, shared space, doing harm to the park the community has waited for, fought for, and been lied to about for over 20 years. Waterfronts are rare places in a dense city where people can experience openness, light, air, and meaningful connection to nature—spaces that carry critical importance for human well-being by offering room to breathe, reflect, and feel grounded—and narrowing the esplanade and building so close to it changes how people experience the waterfront, making something that should feel open begin to feel constrained. Natural waterfront spaces support environmental balance, create habitat, and help cities remain livable as they grow, but once they are reduced or built over, that loss cannot be reversed—this is about asking for balance and recognizing the long-term value of preserving open, natural space along the water, because once this opportunity is gone, it is gone for good. (E. Braswell, R. Colucci, J. Mraz, J. Boineau, H. Chang, E. Delora, C. Love, Save The Inlet)

*Response: See response to **C.57**.*

C.60 The project will directly degrade the design and user experience of Bushwick Inlet Park. Erecting 640', 490', and 260' towers abutting the inlet section of the park will negate the 'open' aspect of open space here. (S. Chesler)

*Response: See responses to **C.57** and **C.58**. As detailed in EIS **Chapter 5, Open Space**, the Proposed*

Actions would not result in a physical loss of public open space, affect the use of an open space so that it no longer serves the same user population, or limit public access to an open space. As such, no direct open space impacts would occur.

C.61 The study area is not a just measure for this DEIS category. Consideration must be given to all of the new waterfront and upland development in Greenpoint and North Williamsburg over the last 20 years, which continues to grow. Tens of thousands of new residents have moved into these areas, especially on the East River waterfront near the 40 Quay site. (S. Chesler)

Response: The half-mile residential study area used for the open space analysis is consistent with guidance in the CEQR Technical Manual.

C.62 The DEIS shows the active open space ratio falling to 0.98—less than half the CEQR guideline of 2.0 acres per 1,000 residents. The DEIS then dismisses this critical deficit by noting it already existed before the project. This is the logic that environmental review is supposed to prevent: using an existing deficiency to justify making it worse. A project that drives the active open space ratio further below half the CEQR standard, adjacent to an incomplete park, should be found to have a significant adverse impact. (Resilient Red Hook)

*Response: See response to **C.57**. CEQR Technical Manual guidance for conducting an analysis of the indirect effects of a proposed action on open space considers both quantitative and qualitative assessments. While impact thresholds are exceeded in the quantitative assessment, there are several qualitative factors that, together, support the conclusion of no significant adverse impact. These qualitative factors, as detailed in EIS **Chapter 5, Open Space**, are summarized below.*

Future residents and members of the public would have access to the entire Bushwick Inlet Park[2], as well as the 0.99-acre WPAA and PAA that would be constructed as part of the Proposed Development.

The Project Developer would maintain the open space proposed as part of the Proposed Development.

The Project Developer would provide funding to the City/NYC Parks for the maintenance and operation of Bushwick Inlet Park for the duration of the 99 year ground lease, which will help to provide the appropriate upkeep and staffing for the community's maximum utilization and enjoyment of the space.

Residents of the Proposed Development would have access to approximately 18,000 sf of outdoor terrace space as a private building amenity, which would further alleviate demand on nearby public open space resources.

There are additional open space resources, outside of the study area, that are available for residents of the Proposed Development and surrounding community to enjoy. For example, the 1.06-acre Ericsson Playground, located directly across the street from the eastern edge of McCarren Park, features basketball courts and handball courts for active recreation. The 3.08-acre North 5th Street Pier and Park is within the half-mile radius but is not included in the quantitative analysis because it is located in a census tract with less than half of its area within the half-mile radius.

Because the ERU Facility would move operations to the NYCTA Relocation Site in the With-Action condition, the ERU Site would be vacant, which would allow for the full realization of the City's long-anticipated plan for Box Street Park, an additional approximate 25,000 sf of public open space. Though

[2] CEQR guidance under Section 330, "Preliminary Assessment," indicates that an analysis must calculate any changes in the acreage of open space to occur in the study area by the proposed project's build year to establish the baseline open space acreage assumed under the future No-Action condition. As Bushwick Inlet Park is anticipated to be completed by the project's analysis year, it is assumed that the new open space would be available for public use in the quantitative analysis.

located outside of the half-mile study area, the larger Greenpoint neighborhood would benefit from this additional open space resource that would not have an immediate path forward without the Proposed Actions.

C.63 The DEIS states that upon completion, Bushwick Inlet Park will encompass 35.53 acres. The 35.53-acre total includes approximately 8 acres of water areas within Bushwick Inlet and unusable buffer zones that cannot function as recreational open space. When these are excluded, the actual usable parkland is closer to 27–28 acres. This discrepancy has a direct, quantifiable effect on the DEIS's impact finding. The DEIS reports that the study area's open space ratio would decrease by approximately 8% from the No-Action to the With-Action condition. However, when the open space ratio is recalculated using the accurate usable acreage of Bushwick Inlet Park (27–28 acres rather than 35.53 acres), the decrease is approximately 18%—more than double what the DEIS reports and well above the threshold at which CEQR methodology requires a finding of significant adverse impact. The Commission should require the open space analysis to be rerun using only genuinely usable, publicly accessible parkland acreage—and should treat the corrected 18% decrease as the operative figure for its impact determination. (Resilient Red Hook)

Response: The acreage utilized in the EIS open space analysis for the completed Bushwick Inet Park was identified consistent with the methodology set forth in the CEQR Technical Manual and in consultation with the NYC Department of Parks and Recreation (NYC Parks).

C.64 Brooklyn Community District 1 lacks open space. This project will worsen this problem, especially in the study area, by almost 18% reduction in open space, with elimination of the unusable watery sections of Bushwick Inlet Park's zoning lots (almost 10 acres overstated) from the padded calculation. The project will lower the ratio even further, combined with a very marginal increase in new open space. (S. Chesler)

Response: See response to **C.57***and* **C.58***.*

C.65 The developer seeks a waiver to narrow the Waterfront Public Access Area to 30 feet—10 feet below the required 40-foot minimum. The DEIS counts approximately 9,000 sf of vehicular turnaround and planted areas as "public access area." Private rooftop terraces (approximately 18,000 sf) are cited as offsetting demand on public open space—but these are exclusively for building residents and should not be credited against a public open space deficit. The Commission should require: 1. Recalculation of open space ratios using only publicly accessible, ground-level, usable open space—excluding water areas, vehicular turnarounds, and private rooftop amenities. 2. Denial of the WPAA waiver, or a finding that the reduced WPAA constitutes a significant adverse impact. 3. A finding that driving the active OSR further below half the CEQR standard constitutes a significant adverse impact requiring mitigation. (Resilient Red Hook)

Response: See responses to ***C.57*** *and* ***C.58****.*

C.66 STI urges the Department of City Planning to expand the scope of its open space review to capture the reality of a fast-growing residential neighborhood. Consideration must be given to the tsunami of new waterfront and upland development in Greenpoint and North Williamsburg over the last 20 years, which has shown no signs of slowing down. Tens of thousands of new residents have moved into these areas, especially on the East River waterfront near the 40 Quay site. Current nearby public open spaces are inundated to full capacity during peak periods. (Save The Inlet)

Response: Comment noted. The open space analysis in the EIS was conducted under guidance in the CEQR Technical Manual and in coordination with NYC Parks.

Shadows

C.67 The proposed 600-foot building, the tallest in the area, will cast shadows that will change living creature habitats and block access and views of the waterfront, denying residents access to sunlight they would otherwise have. (L. Celentano)

*Response: As described in **Chapter 6, Shadows** detailed shadows analysis was prepared in accordance with the 2025 CEQR Technical Manual to evaluate whether the Proposed Development would result in incremental shadows on sunlight-sensitive resources. The EIS concludes that incremental shadows would not result in significant adverse impacts to natural resources, public open space, or architectural resources.*

C.68 The 600-foot tower will cast extensive shadows across the park, surrounding streets, and community garden, with modeling showing that during winter months (roughly November 15 through March 15) nearby streets such as Noble Street would lose direct sunlight after approximately 2:00 PM. The development will deprive many streets and dwellers of direct sunlight, cast significant shade over the community garden's already small growing footprint (limiting the ability to grow food and maintain plantings), and leave open public space that should be protected by law as sunlight-sensitive in shadow for most of the day—impacts that affect mental health, street safety, and quality of life in a dense urban environment where access to light is not trivial. (M. Szczęsna, S. Cahill, A. A. Smolarski, E. Smyk-Fidel, Z. Raphael)

Response: A detailed shadows analysis was conducted pursuant to the 2025 CEQR Technical Manual to evaluate whether the Proposed Development would result in incremental shadows on sunlight-sensitive resources such as publicly accessible open spaces and community gardens. Under CEQR guidance, public streets (including Noble Street) are not considered sunlight-sensitive resources; therefore, potential shadow conditions on Noble Street were not analyzed as part of the EIS shadows assessment. The EIS concludes that the incremental shadows would not inhibit vegetation growth or significantly affect public use of any sunlight-sensitive resource, and would not result in a significant adverse shadows impact.

C.69 I oppose the rezoning of Bushwick Inlet known as "Monitor Point" because it steals parkland by requesting the city to remove park designation from an adjoining property to allow high-rise towers. The towers will block out the sun on Noble St for some hours during Winter; gas prices went up for the same period compared to last year, and losing any sunlight/being in shadow for longer periods increases heating costs. (A. Catchaturyan)

*Response: The shadows analysis provided in EIS **Chapter 6, Shadows**, was performed in accordance with the 2025 CEQR Technical Manual and focuses on the potential for incremental shadows on sunlight-sensitive resources. Public streets such as Noble Street are not considered sunlight-sensitive resources under the CEQR Technical Manual's guidance; therefore, potential shadow conditions on Noble Street were not analyzed as part of the EIS shadows assessment. The EIS does not quantify potential effects on heating costs, and the CEQR Technical Manual does not treat potential shadow-related heating cost changes as the basis for a finding of significant adverse shadows impacts. The EIS concludes that the Proposed Actions would not result in significant adverse shadows impacts to sunlight-sensitive resources, as detailed in the above response to **C.67**.*

C.70 The proposed three buildings will cast a shadow of at least 2,600 feet in length over the proposed green open space located on the west side of the west tower, as well as over the surrounding area, due to the size and height of the buildings. (E. Smyk-Fidel)

*Response: The EIS shadows assessment followed the 2025 CEQR Technical Manual methodology, as described in **Chapter 6, Shadows**. The EIS detailed analysis found that incremental shadows on nearby sunlight-sensitive resources would be limited in duration and would not substantially reduce direct sunlight in a manner that would significantly alter public use or threaten vegetation viability. Accordingly, the EIS concludes that the Proposed Actions would not result in significant adverse shadows impacts.*

Regarding potential shadows on the proposed new open space that is part of the Proposed Development, shadows on project-generated open space are not considered significant under the CEQR Technical Manual's guidance.

C.71 There are already 10 new luxury towers on the Greenpoint waterfront casting enormous shadows on the properties of long time residents. (N. Moore)

*Response: The EIS shadows assessment was prepared in accordance with the 2025 CEQR Technical Manual, as described in **Chapter 6, Shadows**, which evaluates incremental shadows on defined sunlight-sensitive resources. Shadow effects on streets and private residences (including Quay Street and West Street) are outside the scope of a shadows analysis because they are not considered sunlight-sensitive resources under the CEQR Technical Manual. The detailed shadows analysis modeled the future No-Action condition and compared it to the future With-Action condition to identify incremental shadow effects attributable to the Proposed Development on sunlight-sensitive resources. The EIS concludes that incremental shadows attributable to the Proposed Development would not result in significant adverse impacts on the sunlight-sensitive resources evaluated.*

C.72 The proposed development will cast long shadows over Bushwick Inlet Park and the waterfront, diminishing the public's enjoyment of these vital open spaces. Bushwick Inlet is one of the few remaining inlet-edge open spaces along this part of the Brooklyn waterfront, and a project of this scale would cast significant shadows over the park and surrounding streets and increase pressure on an already vulnerable shoreline. (J. Rasmussen, F. Chilcott, R. Colucci)

Response: A detailed shadows analysis was conducted in accordance with the 2025 CEQR Technical Manual to evaluate incremental shadows on sunlight-sensitive resources, including Bushwick Inlet Park and other nearby publicly accessible open spaces, as well as nearby natural resources, including Bushwick Inlet and the East River.

*As described in **Chapter 6, Shadows**, incremental shadows would not significantly diminish public enjoyment of Bushwick Inlet Park because the affected areas would continue to receive substantial sunlight over the course of the day, and vegetation would continue to receive sufficient direct sunlight.*

*As described EIS **Chapter 6, Shadows** and **Chapter 9, Natural Resources**, a detailed shadows analysis performed for the Proposed Development indicates that no significant adverse shadow impacts would occur to Bushwick Inlet as a result of the Proposed Development. At no point would incremental project-generated shadows result in the complete elimination of sunlight from Bushwick Inlet, and any effects on Bushwick Inlet or nearby surface waters would be temporary and of limited duration. Therefore, the Proposed Actions would not result in a significant adverse shadows impact on Bushwick Inlet Park, Bushwick Inlet, or other sunlight-sensitive resources evaluated in the EIS.*

C.73 Bushwick Inlet Park is blessed to have within its midst an incredibly unique tidal embayment estuary, Bushwick Inlet. Shadows from the out of scale plan that will lie adjacent to Bushwick Inlet and Bushwick Inlet Park, must be studied to analyze the potential adverse effects on marine life and vegetation. (S. Chesler)

*Response: See response to **C.72**.*

C.74 The Greenpoint historic district will be enveloped by the project's immense, and far reaching shadows for long durations, creating a bleak sunlight deprived experience for affected residents, especially on Quay Street and West Street with the 3-tower West Wharf project built across the street from 40 Quay. (S. Chesler)

*Response: See response to **C.68**. Shadow effects on streets and private residences (including Quay Street and West Street) are outside the scope of a shadows analysis because they are not considered sunlight-sensitive resources under the 2025 CEQR Technical Manual.*

C.75 The DEIS conclusion that 56-story tower shadows on Bushwick Inlet Park are of "limited duration" and would not "adversely affect public enjoyment" does not withstand scrutiny. At 3:00 PM on a winter solstice day, the shadow extends approximately 2,970 feet—over half a mile. By 4:00 PM, the shadow extends nearly 7,900 feet—1.5 miles—covering approximately 30 city blocks. The DEIS does not model cumulative shadow impacts when combined with the approved West Wharf towers, Calyer Place, and other pipeline projects. The combined shadow wall these developments create will fundamentally alter the usability of the park and the character of the neighborhood. The Commission should find that permanent, unavoidable shadow impacts to a public open space serving an underserved neighborhood—particularly one that is still under construction after twenty years of delay—constitute a significant adverse impact that cannot be mitigated. (Resilient Red Hook)

*Response: See response to **C.72**. As described in EIS **Chapter 6, Shadows**, a detailed shadows analysis was prepared for the Proposed Development in accordance with the 2025 CEQR Technical Manual. Under the CEQR Technical Manual's guidance, shadow significance is determined by evaluating incremental shadows on sunlight-sensitive resources through a comparison of the future No-Action condition and the future With-Action condition on CEQR's four representative analysis days.*

The future No-Action condition includes existing buildings and other known development projects that are expected to be completed by the EIS analysis year. The shadow model is geo-located and incorporates local topography and terrain and surrounding built conditions so that shadow projections reflect real-world screening and blocking effects. Based on the resulting incremental shadow conditions, the EIS concludes that the Proposed Actions would not result in significant adverse shadow impacts on sunlight-sensitive resources.

C.76 The towers will cast shadows on Noble St for some hours during winter. (A. Catchaturyan)

*Response: See response to **C.68**.*

C.77 The shadow cast by a 60-story building is significant throughout the year but will be especially notable in Greenpoint during the low winter sun. Similarly, during spring (e.g., May 15th), once a 600-foot tower is built, Transmitter Park will be shaded for about 20 minutes during the afternoon from 12:10 to 12:30 PM. Please explain how these shadows are justified. (Save The Inlet)

*Response: EIS **Chapter 6, Shadows**, addresses the potential for the Proposed Actions to create significant adverse shadows impacts on Transmitter Park. The EIS concludes that project-generated*

shadows would not result in significant adverse impacts to Transmitter Park because the shadows are of limited duration.

Historic and Cultural Resources

C.78 Many of the houses in Greenpoint are old wood frame houses, and many of them have historical value. (E. Smyk-Fidel)

*Response: Comment noted. As detailed in EIS **Chapter 7, Historic and Cultural Resources**, the Proposed Development would not result in significant adverse impacts to historic and cultural resources. Four architectural resources were identified within the quarter-mile study area relative to the Development Site. The analysis finds that the Proposed Development would not significantly alter or affect the setting, visual relationship, or publicly accessible views of the identified historic resources within the study area.*

Urban Design and Visual Resources

C.79 Building heights in the area have been progressively increasing, setting a precedent where every subsequent developer will request the same 60-story height, claiming necessity. This escalation creates a harder, less permeable edge along the waterfront. (C. Romano, D. Thompson, B. Bello, J. Mraz, S. Albrecht, P. Morales-Serret, J. Pietromonaco, M. Giavazzi, A. Odezynska)

*Response: According to the analysis provided in EIS **Chapter 8, Urban Design and Visual Resources**, the Proposed Actions would facilitate the development of built forms and building types that are compatible with the height and density of the existing high-density mixed-use buildings in the vicinity, specifically along the Greenpoint and Williamsburg waterfront. While taller, the proposed buildings on the Development Site would be compatible with the scale and use of surrounding buildings. The proposed buildings would be in context with trending high-rise waterfront development that has resulted from the 2005 Greenpoint-Williamsburg Rezoning. Further, the additional height contemplated under the Proposed Actions would allow for an increased number of affordable housing units and would help to maximize the publicly accessible open space on-site. Additionally, the inclusion of street-front retail, active ground-floor uses, improved streetscapes, and public realm features, along with new publicly accessible waterfront open space, would enliven the edges of the Development Site. As such, the Proposed Actions would not result in significant adverse impacts.*

C.80 The proposed towers would create a barrier between the surrounding low-rise neighborhood and the waterfront, positioned directly on the edge of a public park with no setback. The proposed design is antisocial and destructive to the urban environment. (M. Szczęsna, J. Gilbert-Davis, T. McKeever)

*Response: As described in **Chapter 8, Urban Design and Visual Resources**, the Proposed Development has been massed and sited with the intent to improve, rather than diminish, physical and visual connectivity between the upland neighborhood and the waterfront. The existing NYCTA facility and fencing currently block access to and views of the shoreline and Bushwick Inlet Park, and the Development Site is not publicly accessible under existing or future No-Action conditions. The Proposed Development would introduce approximately 50,000 square feet of open space, including an approximately 34,000-square-foot WPAA and approximately 9,000 sf of PAA, creating new public waterfront open space that connects Bushwick Inlet Park to the south with the existing Shore Public Walkway to the north, and provides a new upland connection between West Street and Bushwick Inlet*

Park where none exists today. The buildings are sculpted with setbacks and tiered massing, with taller elements concentrated toward the west and stepping down toward the east, and with generous spacing between buildings intended to maintain openness, light, air, and view corridors to the East River, Manhattan skyline, and Bushwick Inlet Park. At the ground level, active street-front retail, building lobbies, and transparent façades would replace the existing blank walls and fenced industrial frontage, thereby enlivening the streetscape on Quay Street and West Street and enhancing the pedestrian environment relative to existing and No-Action conditions. Based on this analysis, ***Chapter 8, Urban Design and Visual Resources,*** *concludes that while the buildings would be taller than existing structures on the Development Site, they would not create an impermeable barrier, would enhance connectivity and the public realm, and would not result in significant adverse impacts.*

C.81 The public access area has been narrowed from the previously required 40 feet to just 30 feet. When measured against a building approximately 600 feet tall, the resulting height-to-width ratio exceeds 20:1, creating a building wall rather than a public park. Even if the variance is not requested and the space is expanded back to the legally required 40 feet, it remains severely out of scale. (M. Szczęsna, N. Shannon, T. Hameline, S. Chesler)

Response: The Proposed Development would comply with all applicable PAA and WPAA regulations under the proposed zoning.

C.82 The proposed tower's height poses serious safety hazards adjacent to the park. During snowstorms, existing 40-foot towers already accumulate heavy snow loads, and because this is a high-wind corridor along West Street, large chunks of ice are blown off and cascade down into the park area. The new trophy tower, which would be significantly taller, would make this dangerous condition considerably worse in this same location. (M. Szczęsna)

Response: The EIS, ***Chapter 8, Urban Design and Visual Resources,*** *contains an assessment of the Proposed Development's potential effects on pedestrian wind conditions, which found that typical weather patterns would not lead to future wind conditions surpassing safety criteria for pedestrian spaces within and around the Development Site. Pedestrian areas such as sidewalks, parking lots, walkways, landscaped spaces, and building access points are expected to maintain safe wind conditions. Falling ice conditions are outside the scope of the analysis recommended by the CEQR Technical Manual; the Proposed Development will comply with applicable building code requirements subject to DOB oversight.*

C.83 The existing NYCTA facility has existed for decades as a single-story industrial building much like the surrounding buildings along Franklin and upland Greenpoint. It is not out of character. However, the proposed towers will dramatically change the character of Quay Street from historic industrial Greenpoint waterfront with light and air into a massive wall along the sidewalk at 21 stories, a multi-story podium with 2 high rise towers at 41 and 56 stories. This will shut out light from the South casting Quay Street and upland Greenpoint into shadow. Contrary to DEIS, the views will be gone. The connector street, which the Applicants claim credit for, is required by the zoning restriction. (Save The Inlet)

Response: See responses to ***C.79*** *and* ***C.80****. In accordance with CEQR Technical Manual guidance, an assessment of the Proposed Actions effect on visual resources was included in the EIS. As described in* ***Chapter 8, Urban Design and Visual Resources****, in the future with the Proposed Actions, the buildings on the Development Site would create view corridors that do not existing under current conditions. Further, the new buildings would not obstruct existing views of the East River and the Manhattan skyline. Furthermore, the Proposed Development would introduce publicly accessible waterfront open space, establishing a seamless connection to Bushwick Inlet Park. Additionally, as*

*described in **Chapter 6, Shadows**, no significant adverse impacts to sunlight sensitive resources would occur due to shadows from future development under the Proposed Actions.*

C.84 A large-scale development with a rezone from height-restricted R6 to R8, 10 times taller than the as-of-right limit (and up to 240' taller than any waterfront building north of Domino Park), would create an oppressive user experience in Bushwick Inlet Park and on the streets near 40 Quay Street. It would significantly and adversely effect the human experience on the ground. (Save The Inlet)

*Response: See response to **C.79** and **C.80.***

C.85 Save the Inlet doesn't think that the Pedestrian-Level Wind (PLW) Study included in Appendix D of the Monitor Point DEIS sufficiently evaluates wind impacts on both migratory birds and passive recreation conditions at Bushwick Inlet Park, a recognized ecological complex and critical public open space resource. (Save The Inlet)

Response: The pedestrian wind assessment was conducted in accordance with CEQR Technical Manual guidance. As stated in the CEQR Technical Manual, a pedestrian wind assessment should focus on the extent to which the massing and orientation of buildings and other features of the proposed development contribute to an exacerbation of pedestrian wind conditions. Per CEQR guidance, this analysis does not include the effects of wind on wildlife.

The pedestrian wind study prepared for the EIS determined that the Proposed Development would adhere to the wind safety criteria and would conform to the respective pedestrian comfort standards. Therefore, outdoor areas around the Proposed Development are deemed safe and suitable for the intended pedestrian uses, and no significant adverse impacts related to pedestrian comfort would occur because of the Proposed Actions.

C.86 The only accessible route to the waterfront is a secondary 6-foot-wide ramp — wholly inadequate for over 2,000 new residents and the public, where strollers, cyclists, and mobility device users will be competing for this narrow corridor. Adding close to 3,000 new residents behind a 12-foot-wide path is not a solution. (L. Celentano, N. Shannon)

*Response: As described in EIS **Chapter 8, Urban Design and Visual Resources**, the Proposed Actions would introduce public waterfront access and open space connectivity where it currently does not exist. The Proposed Development would feature approximately 50,000 sf of open space including an approximately 34,000-sf WPAA, and approximately 9,000 sf of PAA, offering new public open space with enhanced public access to the East River and Bushwick Inlet, key natural resources in the study area. On Lot 25, a 30-foot-wide upland connection at the terminus of Quay Street would link to a Shore Public Walkway running parallel to the newly elevated and reinforced shoreline, varying from 21 to 40 feet wide, which would include a 12-foot-wide clear public path. On Lot 1, a 60-foot-wide upland connection flanked by PAAs is intended to create a consolidated open space that expands from 108-feet-wide at Quay Street to 176-feet-wide at its connection with Bushwick Inlet Park. Streetscape improvements along Quay Street would enhance the existing 15-foot-wide sidewalk with street trees and bike racks. This new open space would create a continuous waterfront corridor extending from Marsha P. Johnson State Park to the south, through Bushwick Inlet Park, to the Shore Public Walkway north of the Development Site.*

Natural Resources

C.87 Concerns exist about the effect this development could have on the waterfront environment. Wildlife has slowly returned to this shoreline, highlighting the ecological sensitivity of the

area. A project of this scale raises concerns about shadows, pressure on nearby parks, and broader impacts on an already vulnerable waterfront. Growth must be balanced and supported by the infrastructure and public resources a neighborhood needs in order to absorb it. (C. Dunn)

*Response: In accordance with CEQR requirements, a thorough evaluation of the potential impact of the Proposed Actions on natural resources, including the waterfront environment and its resident wildlife, was performed (see **Chapter 9, Natural Resources**). The assessment also included thorough analyses of all potential direct or indirect effects of the Proposed Actions on natural resources, including discussions of project design measures and adherence to regulatory agency requirements that would avoid or minimize any potential adverse impacts. Based on these analyses, the natural resources assessment concluded that significant adverse effects to the waterfront environments and wildlife would not occur as a result of the Proposed Actions.*

*The EIS recognizes community concern regarding potential effects of a development of this scale on the waterfront environment and nearby open spaces. A detailed shadows analysis was conducted, provided in EIS **Chapter 6, Shadows** and referenced in **Chapter 9, Natural Resources**, in accordance with the 2025 CEQR Technical Manual to determine whether the Proposed Development would result in incremental shadows on sunlight-sensitive resources, including nearby parks/open spaces and natural resources (the East River and Bushwick Inlet).*

*Regarding the potential for incremental shadows to affect natural resources, see response to **C.72**.*

*Regarding the potential for increased pressure on nearby parks, see response to **C.57**.*

C.88 Bushwick Inlet is a unique environmental feature and one of the city's few remaining natural shorelines, serving as habitat for vulnerable species including diamondback terrapin turtles, scaups, mergansers, and as a vital rest stop for migrating birds on the Atlantic Flyway such as warblers, scoters, and herons. Placing massive skyscrapers directly on the inlet's narrow shoreline threatens this delicate ecosystem through habitat displacement, reduced air quality, waterway pollution, shadow impacts, and bird-window collision risk (over 100,000 birds are killed annually in the city this way, many threatened or endangered), while the project's excessive height would obstruct flight paths for shorebirds and birds of prey that require additional maneuvering space, ultimately reducing the inlet to an aesthetic feature rather than preserving its ecological function as a natural sanctuary. (L. Celentano, C. Caglioni, B. Homer, E. Braswell, J. Boineau, M. Bizzarri, R. Colucci, V. Dipietra, S. Chesler)

*Response: As detailed in **Chapter 9, Natural Resources**, the existing terrestrial habitats at the Development Site are cultural (human influenced) habitats that have been created or significantly altered by historical and ongoing disturbance and development at the Development Site, including the unvegetated, impervious surfaces of the existing NYCTA Facility, which occupies 100 percent of Lot 1. Beyond the NYCTA Facility, the upland areas of Lot 25 consist of unvegetated areas of gravel and soil, patchy grasses and other herbaceous vegetation occurring over recently placed fill, and scattered brushy areas growing atop an otherwise largely unvegetated shoreline revetment consisting of riprap, broken concrete slabs, and other construction/demolition debris. Overall vegetated cover, including tree cover, is fragmented and spatially limited, and forests or other woodland habitats do not occur at the Development Site. The limited vegetated cover includes significant occurrences of non-native/invasive plant species populations that have degraded the overall ecological value of the property. Based on these conditions, as well as the desktop reviews and field surveys performed as part of the DEIS existing-conditions assessment, the Development Site does not represent a significant habitat area for local wildlife, and the observed and expected terrestrial wildlife fauna of the Development Site is*

composed of a limited assemblage of species that are adapted to degraded habitat conditions within urban settings with elevated levels of human activity. Therefore, implementation of the Proposed Actions would not result in significant removal of habitat used by local wildlife.

*The Proposed Actions would not result in significant adverse air quality impacts on surrounding sensitive receptors, including Bushwick Inlet (see **Chapter 12, Air Quality**). Projected sanitary and stormwater flows would not cause the Newtown Creek Water Resource Recovery Facility (WRRF) to exceed its operational capacity or cause an increase in combined sewer overflow events (see **Chapter 11, Water and Sewer**); as such, waterway pollution impacts to Bushwick Inlet are not anticipated. In addition, as further detailed in **Chapter 11**, stormwater best management practices (BMPs) would be required in accordance with the DEP Unified Stormwater Rule (USWR) guidelines, which include requirements for bringing the Development Site into compliance with the allowable stormwater release rate.*

*With respect to shadows impacts, as summarized in the response to **C.72** and described at length in **Chapter 6, Shadows**, the Proposed Actions would not result in a significant adverse shadows impacts to Bushwick Inlet, including the Bushwick Inlet REC.*

To avoid/minimize the potential for bird collisions, the Proposed Development would be designed and constructed in compliance with New York City Local Law 15. Based on adherence to Local Law 15, the potential for bird-building collisions would be avoided/minimized in accordance with New York City requirements. Accordingly, no significant adverse effects to local or regional bird populations are anticipated.

C.89 I request a very thoughtful and thorough environmental evaluation of the impact of the proposed development on 40 Quay Street on natural resources. (E. Smyk-Fidel)

*Response: In accordance with CEQR guidance, a thorough evaluation of existing natural resources and potential impact of the Proposed Actions on same was performed (see **Chapter 9, Natural Resources**). The natural resources assessment included desktop reviews of existing natural resources, as well as seasonal ecological field surveys conducted by a Certified Ecologist (Ecological Society of America) and Professional Wetland Scientist (Society of Wetlands Scientists). The field surveys included habitat assessments, plant and wildlife species inventories, and evaluations for the potential presence of federal and/or New York State-listed species and species habitats. Additionally, the regulatory setting for relevant federal, New York State, and New York City laws and implementing regulations pertaining to natural resources were established and described in the natural resources evaluation. Pursuant to CEQR guidance, the evaluation also included thorough analyses of all potential direct and indirect effects of the Proposed Actions on natural resources. Discussions of project design measures and adherence to regulatory agency requirements that would avoid or minimize any potential adverse impacts were also included in the natural resources evaluation.*

C.90 Bushwick Inlet is a rare tidal estuary and one of the last vestiges of natural habitat in North Brooklyn, supporting 101 documented bird species including vulnerable diamondback terrapins that nest on site, herons, geese, bufflehead birds, and other wildlife, and serving as an essential part of the East River's ecological network that provides climate resilience (more than 80% of marine life's health depends on estuaries like this). The proposed development threatens years of shoreline restoration work on the Motiva parcel through deep foundation drilling that risks destabilizing the newly built tidal marsh, rip rap, and earthen berm, while the proposed steel bulkhead will lock the waterfront edge in place for a century, amplify wave action, increase erosion, and sever the natural relationship between upland and tidal inlet—the opposite of the adaptive, nature-based approach needed in a floodplain facing accelerated

sea level rise that FEMA plans do not account for. The 600+ and 450-foot towers placed only 50 feet from the shoreline pose severe risks to migratory birds (90,000 to 230,000 birds die annually in NYC from building collisions) through reflective glass and lighting that will confuse birds using the East River corridor for navigation, while construction and operation will impact aquatic life through bulkheads, stormwater runoff, and water shading. Once this irreplaceable ecosystem is destroyed, no mitigation fees or token measures can restore it—the inlet will be permanently reduced from a thriving wetland habitat to a mere water feature amenity within a private development. (L. Hofmann, N. Shannon, S. Stansbury, S. Roberts, P. Morales-Serret, D. Marker, A. Hillel-Tuch, L. Eddins, A. Catchaturyan, L. Jaeggi, S. Cahill, A. Fischer, C. Kantin, S. Albrecht, D. Thompson, E. Smyk-Fidel, Save The Inlet)

*Response: As detailed in **Chapter 18, Construction**, activities involving vibration would only occur for limited periods of time at any particular location, and vibration monitoring of adjacent properties would be implemented, as required by code, thereby avoiding any potential destabilization effects to the new shoreline features at the Motiva Parcel.*

*Regarding the proposed shoreline revetment and bulkhead, as detailed in **Chapter 14, GHG and Climate Change**, the Development Site is located within a "Special Flood Hazard Area," also known as the 100-year flood zone (2015 PFIRMs), with 1.0 percent annual chance or greater of flooding. As such, the Proposed Development, inclusive of the proposed shoreline revetment and bulkhead, would be built to all applicable Appendix G Building Code standards, and the Proposed Actions would promote New York City WRP Policy 6.2 (Climate Change & Sea Level Rise Integration). Additionally, establishment of the revetment and bulkhead would enable the excavation necessary to perform the required remediation of contaminated soils and groundwater at the Development Site, thereby preventing future contamination of tidal habitats within Bushwick Inlet and the East River (see **Chapter 10, Hazardous Materials**). Moreover, the proposed shoreline revetment and bulkhead would substantially reduce erosion as compared to existing conditions, where significant erosion of upland areas and ongoing sedimentation impacts to Bushwick Inlet occur due to destabilized shorelines and failure of portions of the existing revetment. Based on the foregoing, the bulkhead and revetment would provide important and required flood protection and coastal resiliency benefits, protect Bushwick Inlet from soil and groundwater contamination, and address ongoing shoreline erosion and sedimentation impacts to Bushwick Inlet that currently occur at the Development Site.*

*With respect to potential risks to migratory birds, as summarized in the response to C.89 and described in detail in **Chapter 9, Natural Resources**, the Proposed Development would be designed and constructed in compliance with New York City Local Law 15, which requires that materials that reduce bird strike fatalities be installed on newly constructed or altered buildings. Based on adherence to Local Law 15, the potential for bird-building collisions would be avoided/minimized in accordance with New York City requirements. Accordingly, no significant adverse effects to migratory bird populations are anticipated.*

*As summarized in the responses to **C.87** and **C.88** and discussed at length in **Chapter 11, Water and Sewer** and **Chapter 6, Shadows**, based on thorough analyses performed in accordance with CEQR Technical Manual guidance, significant adverse effects to aquatic habitats and resident fauna from stormwater runoff and shadows are not expected.*

C.91 The development's ecological assessment is greenwashed, half-baked nonsense not based on any ecological science. Bushwick Inlet is one of the East River's last natural tidal estuaries — a migratory bird corridor, a rare marshland, and a living coastal buffer. This is a 100-year flood zone, and the plan would destroy that, which is reckless. The towers would waste an ecological

opportunity for natural flood resilience in a flood-prone neighborhood. (M. Bohk, M. Meoni, J. Gilbert-Davis)

*Response: As detailed in the response to **C.87**, a thorough evaluation of existing natural resources and potential impacts of the Proposed Actions on same was performed in accordance with the scientific, ecologically based methodologies set forth in Chapter 11 of the 2025 CEQR Technical Manual (see **Chapter 9, Natural Resources**).*

As described in the above-referenced natural resources assessment, Bushwick Inlet is located within a migratory bird corridor, contains newly-established marshland habitats at the Motiva Parcel of Bushwick Inlet Park, and provides coastal buffer benefits, as noted in the comment. As further described in the natural resources assessment, implementation of the Proposed Actions would not result in significant adverse effects to marshlands and migratory birds and would actually result in some positive effects on these resources. With respect to migratory birds in particular, due to the proposed removal of non-native/invasive plant species and increases in the spatial extent of tree and vegetated habitat zones at the Development Site, the resulting quantitative and qualitative habitat improvements are expected to result in increased habitat opportunities and individual species population densities for a number of avian species. The numerous native trees to be installed at the Development Site would significantly expand perching, foraging, and nesting habitat opportunities, as compared to existing conditions and the No-Action condition. It is further anticipated that the establishment of lowland and upland maritime shrub and grass habitats that currently do not occur onsite will provide nesting and foraging opportunities for migratory birds that currently do not utilize the Development Site, thereby increasing avian species diversity. Additionally, the proposed habitat connectivity between the maritime shrub and grass habitats at the Development Site and similar habitats that are currently being established at the Motiva Parcel of Bushwick Inlet Park would facilitate movement of birds and other wildlife between contiguous areas of the two properties.

*The Proposed Actions would promote and enhance flood protection benefits and coastal resiliency, both at the Development Site and within Bushwick Inlet. As described in detail in **Chapter 14, GHG and Climate Change**, the Proposed Development would be designed, constructed, and operated in accordance with all federal, New York State, and New Yok City Special Flood Hazard Area requirements and codes, and would promote New York City WRP Policy 6.2 (Climate Change & Sea Level Rise Integration).*

C.92 The proposed development threatens the area's natural flood defenses and ecological integrity. The site is ecologically unique and serves as a critical buffer and transition zone between the park and surrounding development, providing a natural barrier in an already vulnerable flood zone. The proposed sea wall would force flood waters further inland, further endangering flood resilience, while a massive skyscraper would work against nature-based flood defenses that would best protect the neighborhood. Building on this coastal flood zone, just 50 feet from the shore, with increased density and reduced natural land, goes directly against climate resilience priorities. The site sits in a hundred-year flood zone, and with the climate crisis worsening, adding this level of density to the shoreline without broader, neighborhood-scale resiliency planning moves the city in the wrong direction. Approving this project means approving a lifetime of flooding, displacement, and repair expenses, and concentrating climate risk rather than reducing it. Decisions made today will shape the city's vulnerability for generations. (M. Szczęsna, L. Treciokas, C. Kantin, Z. Skoric, F. Chilcott, H. Yang, L. Celentano, K. Yourke, B. Bello, A. Catchaturyan, S. Cahill)

*Response: See responses to **C.90** and **C.91**.*

C.93 The proposed development would negatively impact wildlife at Bushwick Inlet Park through noise and artificial light from three towers located just 50 feet from the park. The resulting pollution would compound existing infrastructure bottlenecks and harm a fragile ecosystem that serves as the best defense against flooding in a 30-to-50-year cycle — a function no manmade structure can replicate. Bushwick Inlet is one of the few remaining inlet-edge open spaces along this part of the Brooklyn waterfront, and a project of this scale would cast significant shadows over the park and surrounding streets while increasing pressure on an already vulnerable shoreline. (E. Smyk-Fidel, N. Soleil, F. Chilcott, V. Dipietra)

*Response: Potential noise impacts from the Proposed Actions in general are described in detail in **Chapter 15, Noise**, and potential noise impacts to wildlife in particular are addressed in **Chapter 9, Natural Resources**. As detailed in the latter chapter, the Development Site and the Motiva Parcel of Bushwick Inlet Park are situated within a densely developed and populated urban area characterized by high levels of human activity, with associated high ambient noise levels. As such, the resident fauna is comprised primarily of species adapted to these conditions. The primary impact to resident wildlife from noise would occur during construction, when it is expected that some resident birds, fish, and other resident organisms at the Motiva Parcel and within the Bushwick Inlet REC would be temporarily displaced to contiguous waters and benthic habitats. However, any temporarily displaced species are expected to return to the disturbed areas following construction. Moreover, pursuant to the federal Endangered Species Act and 6 NYCRR Part 182, and similar to the ongoing NYC Parks habitat restoration and coastal resiliency efforts at the Motiva Parcel of Bushwick Inlet Park, upland and in-water work for the Proposed Development would be conducted in accordance with all applicable USFWS, NOAA Marine Fisheries and NYSDEC requirements, including any applicable include species noise/vibration avoidance and minimization measures. Similarly, the Proposed Development will be constructed and operated in accordance with all applicable New York City light minimization measures and regulations, including New York City Energy Conservation Code requirements for automatic lighting controls, power limits on exterior lighting, and restrictions on lighting zones and lighting power density.*

*Regarding the potential for flooding, the Proposed Actions would promote and enhance flood protection benefits and coastal resiliency, both at the Development Site and within Bushwick Inlet. As described in detail in **Chapter 14, GHG and Climate Change**, the Proposed Development would be designed, constructed, and operated in accordance with all federal, New York State, and New Yok City Special Flood Hazard Area requirements and codes, and would promote New York City WRP Policy 6.2 (Climate Change & Sea Level Rise Integration).*

*With respect to shadows, as summarized in the response to **C.72**, a detailed shadows analysis performed for the Proposed Development indicates that no significant adverse shadows impacts would occur to Bushwick Inlet (inclusive of the Bushwick Inlet REC) as a result of the Proposed Development (see **Chapter 6, Shadows**).*

C.94 The stormwater analysis acknowledges that projected flows exceed the CEQR 5% threshold, which triggers the requirement for further coordination with NYC DEP, yet the analysis still concludes that no significant impact will occur despite that coordination remaining incomplete. These are not minor procedural gaps on an ordinary site — they are unresolved questions that directly bear on the health of one of Brooklyn's few remaining tidal ecosystems. (C. Caglioni)

*Response: The stormwater analysis provided in **Chapter 11, Water and Sewer Infrastructure**, indicates that based on the four rainfall events provided in the DEP Flow Volume Calculation Matrix,*

the increment of sanitary and stormwater flows to the combined sewer system (CSS) would be between 0.036 and 0.187 mgd, which would exceed the 5 percent threshold for which further analysis and coordination with DEP is warranted under CEQR Technical Manual guidance. As there would be an increase of 5 percent or more at the site over existing conditions, further review by and coordination with NYC DEP would be required to determine the site-specific stormwater management measures that would be implemented as part of the Proposed Development to ensure that sanitary and stormwater flows to the combined sewer system would not exceed operational capacity. However, these increments represent only a 0.011 to 0.064 percent increase of the Newtown Creek Water Resource Recovery Facility (WRRF) State Pollutant Discharge Elimination System (SPDES)-permitted capacity. The projected increase in sanitary and stormwater flows would not cause the Newtown Creek WRRF to exceed its operational capacity, and it is anticipated stormwater flows to the CSO would be lower in the With-Action condition. As such, no significant adverse impact would occur.

Additionally, the implementation of BMPs are required under NYC's USWR, which updated and aligned water quantity requirements in the city's combined sewer drainage areas with water quality requirements in separately sewered drainage areas, providing a comprehensive, citywide stormwater management policy for public and private development. Therefore, stormwater retention would be required onsite for small and frequent rainfall events to prevent an increase in CSO events. Accordingly, due to BMPS required under NYC's USWR, as well as compliance with NYCDEP site-specific stormwater management measures required for projects that exceed the five percent threshold for stormwater flows set forth in the CEQR Technical Manual, significant adverse impacts to the tidal ecosystems referenced in the comment would be avoided.

C.95 The 600-foot tall building will cast shadows that block access to the sun and change living creature habitats. (L. Celentano, N. Shannon)

*Response: As noted in the response to **C.88**, implementation of the Proposed Development would result in minor incremental shading to Bushwick Inlet. However, a detailed shadows analysis performed for the Proposed Development indicates that no significant adverse shadow impacts would occur to Bushwick Inlet (inclusive of the Bushwick Inlet REC) as a result of the Proposed Development (see EIS **Chapter 6, Shadows**).*

C.96 The project requires removal of the existing shoreline revetment, construction of a new bulkhead, and remediation of contaminated soils and groundwater — remediation that the report itself acknowledges is necessary to prevent future contamination of tidal habitats in the Inlet and the East River. Rather than treating this as a serious concern, the DEIS frames remediation as a project benefit. The safety of these activities is justified almost entirely by future regulatory compliance that has not yet occurred. No independent ecological assessment is cited, and permits from the Army Corps of Engineers and NYSDEC have not been issued. This is not due diligence — it is deferred accountability. (C. Caglioni)

*Response: As noted in the comment, the required remediation of existing soil and groundwater contamination beneath the Development Site would help to prevent future contamination of tidal habitats within Bushwick Inlet. Therefore, as detailed in **Chapter 9, Natural Resources**, the required remediation would provide ecological benefits, both to the Development Site and Bushwick Inlet. The subject of contamination is identified and discussed at length in **Chapter 10, Hazardous Materials**, which includes detailed summaries of the results of various Phase I and Phase II Environmental Site Assessments performed to date and a summary of the applicable government regulatory programs and requirements. Detailed plans to address and remediate soil and groundwater contamination in a safe*

manner have been developed in accordance with relevant industry BMPs and applicable regulatory standards, and will be submitted to OER for review if necessary

C.97 The building height and number of windows in the proposed project could be devastating to thousands of migrating birds, as they could fall victim to window collisions, despite the 2019 City legislation that protects new construction up to 70 feet. The documentation provided in the DEIS is not comprehensive in capturing the vulnerabilities posed by human interaction (e.g., habitat loss, lead poisoning, various types of pollution). "Artificial light at night (ALAN) is a rapidly expanding pollutant, raising concerns about its impact on species that rely on natural light cues for critical behaviors" (Winter, 2025).

Applicants state (in Appendix E, page 2) "The avian species listed below were observed (i.e., seen and/or heard) during field surveys conducted on January 8 and April 18, 2025 (*indicates species observed within Bushwick Inlet and/or Bushwick Inlet Park). This observed bird species list is not intended to be an all-inclusive inventory of the avian species present at the Development Site."

Indeed, the list fails to capture the avian species seen in the area, especially given the continuous nature of the waterfront shoreline conveyed in the Waterfront Plan, and the adjacent areas utilized for nesting, foraging, and rest (e.g., Bushwick Inlet Park's parcels at 86 or 50 Kent, WNY Transmitter Park, or even the immediate West Wharf's park). The provided list also fails to take into account the Near Threatened species, Killdeer (Charadrius vociferus), which have actively used the span of the waterfront as their nesting grounds "Killdeer are often found away from shores as well as near them, frequenting mudflats, gravel bars, short-grass meadows, and their twentieth-century counterparts, such as construction sites, road shoulders, gravel roads and driveways, graveled rooftops, lawns, pastures, and golf courses" with nesting beginning in "May in the northern tier of states and southern Canada." Already seen in March 2026, this returning nesting migrator was also seen on the Inlet's soft shore beach via a local Naturalist, July 6, 2025, where adults and juveniles were observed (https://ebird.org/species/killde/L2987635) directly in front of the 40 Quay site. This specific species of birds is active both day and night, creating immense challenges for concurrent construction projects in North Brooklyn and Long Island City, where citizen scientists have documented their sightings on Cornell's eBird platform (Jackson, B. J., & Jackson, J. A., 2020).

Continued research needs for these taxa of bird are needed, specifically, "Nocturnal behavior of the species has received scant attention. In particular, more information is needed on the extent of feeding at feeding, possible variation in nocturnal foraging with moon phase, the roles of the sexes in incubation and brooding at night, and the nature of social interactions at night"—while research may not be conducted at this site, the proposition of a highlighted need for the data suggests a vulnerability to the species based on the prioritized behaviors as noted by Jackson and Jackson (2020).

Additionally, this population of birds has been identified as particularly sensitive to collisions with stationary and moving objects, such as buildings—the MTA's single-story height poses minimal conflict with their migratory passage. Noted as "more" prone than other shorebirds to strike television towers and tall buildings during nocturnal movements. Because the gravel aprons frequently present along roadsides are attractive to this species as potential nest sites, and the raised open beds of roads are attractive as display sites, Killdeer are particularly vulnerable to being struck by vehicles" (Jackson, B. J., & Jackson, J. A., 2020). (Save The Inlet)

*Response: As detailed in **Chapter 9, Natural Resources**, to avoid/minimize the potential for bird collisions, the Proposed Development would be designed and constructed in compliance with New York*

City Local Law 15, which requires that materials that reduce bird strike fatalities be installed on newly constructed or altered buildings. Based on adherence to Local Law 15, the potential for bird-building collisions would be avoided/minimized in accordance with New York City requirements.

Regarding the potential for impacts due to artificial lighting, the Proposed Development will be constructed and operated in accordance with all applicable New York City light minimization measures and regulations, including New York City Energy Conservation Code requirements for automatic lighting controls, power limits on exterior lighting, and restrictions on lighting zones and lighting power density.

*In addition to the field surveys conducted during the existing conditions assessment, the following local and regional bird survey data was also reviewed and summarized: National Audubon Society Christmas Bird Count, Cornell Lab of Ornithology eBird (as referenced in the comment) and the New York State Breeding Bird Atlas. The EIS acknowledges that habitat for Killdeer occurs in the vicinity of the Development Site; however, the existing ecological conditions that occur at the Development Site (see **Chapter 9, Natural Resources**) do not represent optimal habitat for this species. Moreover, as noted above in response to **C.88**, by adherence to Local Law 15, the potential for bird-building collisions for Killdeer and other avian species would be avoided/minimized in accordance with New York City requirements.*

C.98 Further, while we have over 150 species recorded at Bushwick Inlet Park, it doesn't account for all 408 migratory bird species that utilize the Atlantic flyway, or the 280 birds known to pass through New York City during migration. Additionally, the Natural Resources section does not investigate the IUNC Red List categories of species (23, 6% globally threatened) that have been noted in the inlet and the subsequent protections to ensure their continued rebound, given the 2025 State of Birds (in appendices) deep concern about the accelerated decline and impact on humans and our environment (NABCI, 2025). What protections are in place for this animal life, which face multiple threats from this project? (Save The Inlet)

*Response: As detailed in **Chapter 9**, **Natural Resources**, multiple relevant bird survey data sources were reviewed as part of the existing ecological conditions assessment. To investigate migratory and non-migratory bird diversity at the regional and local levels, the following databases were reviewed:*

- *National Audubon Society Christmas Bird Count: At the regional level, data from this resource indicates that 136 bird species were identified by Brooklyn Bird Club members during 176.50 total survey hours throughout Brooklyn during the December 16, 2023, regional bird count (Appendix E).*
- *Cornell Lab of Ornithology eBird: According to this local resource, observers noted 137 avian species at Bushwick Inlet Park (between Quay Street and N. 9th Street) from September 2018 to December 2024, (Appendix E).*
- *New York State Breeding Bird Atlas (NYSBBA): According to this local resource, a total of 10 bird species were identified between 2000 and 2005 within the NYSBBA survey block that the Development Site occurs in (Block 5850A). Of these species, five are confirmed as breeding, four are listed as probable breeders, and one is listed as possibly breeding within the survey block (Appendix E).*

*A detailed description of existing site conditions identified through field surveys and the potential impacts of the Proposed Actions on avian species is set forth in **Chapter 9, Natural Resources**. Regarding protections for avian species, as detailed in **Chapter 9**, **Natural Resources** to avoid/minimize the potential for bird collisions, the Proposed Development would be designed and*

constructed in compliance with New York City Local Law 15, which requires that materials that reduce bird strike fatalities be installed on newly constructed or altered buildings. Based on adherence to Local Law 15, the potential for bird-building collisions would be avoided/minimized in accordance with New York City requirements. Additionally, the Proposed Development will be constructed and operated in accordance with all applicable New York City light minimization measures and regulations, including New York City Energy Conservation Code requirements for automatic lighting controls, power limits on exterior lighting, and restrictions on lighting zones and lighting power density.

C.99 While the design of the building is not a wall of glass, collisions still are possible above the 70-foot mark of protection, as well as the physical disruption of the airspace so close to the water's edge. Additionally, habitat loss, construction impacts, various types of pollution, and the threat of car strikes are not eliminated by the 70 feet of bird-friendly building materials required by City law. ALAN not only increases the likelihood of collisions but can also influence marine life (Winter, 2025). (Save The Inlet)

*Response: As detailed in the responses to **C.87**, **C.89**, **C.90**, **C.96**, **C.97**, and **C.98**, based on adherence to New York City Local Law 15, the potential for bird-building collisions would be avoided/minimized in accordance with New York City requirements.*

C.100 Less than 150 feet from the water, this proposed project would inherently impact estuary wildlife and the East River ecosystem, including other forms of life beyond reptiles and mammals. (Save The Inlet)

*Response: As detailed in **Chapter 9**, **Natural Resources**, no significant adverse effects to natural resources, including estuarine species, are expected. Construction of the Proposed Development would result in minor, temporary displacement impacts to some resident species within nearshore portions Bushwick Inlet and the adjoining East River. Such impacts would be avoided or minimized due to BMPs and adherence to regulatory agency permitting requirements during construction. Following implementation of the Proposed Development, improvements to habitat quality and wildlife species diversity are expected, and many local species would experience increases in individual population densities due to expanded habitat opportunities. Accordingly, no significant adverse effects to estuarine species are anticipated.*

C.101 Endangered Diamondback Terrapins (Malaclemys terrapin) have been observed nesting on land designated for development and in Bushwick Inlet Park areas that would be disrupted by the proposed project. The National Fish and Wildlife Service (2025) notes that shoreline properties with bright lighting may require darker window tints to prevent light that disorients protected species and other wildlife. Currently, New York State and City lack lighting standards to minimize light pollution during critical migratory and nesting seasons after 9 PM. While developer-driven interventions show promise, researchers recommend stronger protections, citing the difficulty of enforcing legislation around artificial light at night (ALAN) and building materials across broad geographic areas (Klem, 2025). (Save The Inlet)

Response: *As detailed in **Chapter 9**, **Natural Resources**, the U.S. Fish and Wildlife Service, NOAA Marine Fisheries, and New York State Department of Environmental Conservation records reviewed during the preparation of the DEIS and EIS do not include records for Diamondback Terrapins occurrences at the Development Site. The Proposed Development does not include clearing, grading, ground disturbance, or any other constructions activities at Bushwick Inlet Park, which is owned by New York City and is not controlled by the Applicant.*

*With respect to light minimization measures, please refer to the response to **C.98**.*

C.102 Both Diamondback Terrapins and Killdeer face multiple threats from human activity, including habitat loss, light pollution that disorients marine and terrestrial species, and vehicle strikes. (Save The Inlet)

*Response: Potential adverse effects to Killdeer and Diamondback Terrapin, including project avoidance and minimization measures for these species, are discussed in the responses to **C.97** and **C.101**, respectively, and an impact assessment and discussion of overall wildlife avoidance and minimization measures is provided in **Chapter 9, Natural Resources**. Based on these analyses, significant adverse effects to Killdeer and Diamondback Terrapin are not anticipated.*

C.103 The polluted land at 40 and 46 Quay Street requires remediation, but given the sensitive waterfront location with shallow underground waters and proximity to Bushwick Inlet, remediation must utilize bio-friendly methods such as bioremediation and phytoremediation, with sufficient time allowed for the soil to become non-toxic. If polluted soil is to be excavated, its disposal location must be considered, as dumping toxic soil elsewhere is unethical. Planting trees and vegetation to naturally decontaminate the soil would be preferable, allowing the space to become a true green open space. (E. Smyk-Fidel)

*Response: A thorough discussion of existing soil and groundwater pollution, required remediation, and proposed remediation methods is included in **Chapter 10, Hazardous Materials**. The Proposed Development includes installation of numerous new trees (see **Chapter 9**, **Natural Resources**).*

C.104 I am concerned about the impact this development could have on the waterfront environment. Wildlife has slowly returned to this shoreline, highlighting the ecological sensitivity of the area. A project of this scale raises concerns about shadows, pressure on nearby parks, and broader impacts on an already vulnerable waterfront. Brooklyn needs housing, and thoughtful development is supported. However, growth must be balanced and supported by the infrastructure and public resources a neighborhood needs in order to absorb it. In its current form, this proposal does not appear to meet that standard. (C. Dunn)

*Response: With respect to the potential for shadows impacts, see response to **C.87**.*

Energy

C.105 The development could put additional strain on the electrical grid and may result in increased bills for the rest of the community. (C. Kayel)

According to the CEQR Technical Manual, a detailed assessment of energy impacts is only required for projects that would significantly affect the transmission or generation of energy or that would result in substantial consumption of energy. As detailed in the EAS, and consistent with guidance in the CEQR Technical Manual, development facilitated by the Proposed Actions is expected to consume approximately 185,372,387 incremental British Thermal Units (BTUs) per year. Per the CEQR Technical Manual, the effect of the Proposed Actions on the transmission or generation of energy does not require further analysis, as the Proposed Actions would not have the potential to result in significant adverse impacts.

Hazardous Materials

C.106 The release of hazardous materials from the site will be devastating to this sensitive flood zone and to wildlife, given the scale of construction. (K. Yourke)

*Response: As detailed in EIS **Chapter 10, Hazardous Materials**, a Phase I Environmental Site Assessment (ESA) was performed for Lot 1 on September 20, 2023, and subsurface investigations were conducted in December 2017 (for Lot 25) and September 2023 (for Lot 1) to evaluate for the presence of contamination. The results of the subsurface investigations indicate the presence of contaminants in historic/urban fill materials that exceed applicable NYSDEC Part 375 cleanup criteria. Furthermore, chlorinated volatile organic compounds (VOCs) were detected in one soil vapor sample above New York State Department of Health (NYSDOH) regulatory criteria.*

To address these conditions at the Development Site during redevelopment, the Proposed Actions would adhere to the requirements of the existing (E)-Designation for hazardous materials (E-138), which was applied to Brooklyn Block 2590, Lots 1 and 25 as part of the 2005 Greenpoint-Williamsburg Rezoning. An environmental (E)-Designation is an institutional control that is placed on a site to establish a hazardous materials review and approval framework. It provides a mechanism to ensure that testing for and remediation of hazardous materials, if necessary, are completed prior to future development of an affected site, thereby removing the potential for a hazardous materials impact. (E)-Designated parcels are administered under the authority of the Mayor's Office of Environmental Remediation. The Project Developer has also submitted an application to enroll the Lot 1 portion of the Development Site into the NYSDEC BCP. The implementation of remedial measures required under the (E)-Designation or the NYSDEC BCP would reduce the potential for significant adverse hazardous materials impacts due to the Proposed Actions.

Additionally, a new (E)-Designation (E-870) would be applied to the NYCTA Relocation Site to preclude the potential for significant adverse impacts related to hazardous materials.

C.107 The site has documented environmental pollutants, including PFAS (Forever chemicals) and lead in the soil, and groundwater contamination that breaches New York City's environmental justice guidelines. The period of construction represents the greatest public health risk, and this work should not proceed with minimal scrutiny. (Z. Skoric, E. Fidel, K. Yourke)

*Response: See response to **C.106**.*

Compliance with either the (E)-Designation program under OER oversight or the BCP under NYSDEC oversight would provide for the protection of human health and the environment within the Development Site and NYCTA Relocation Site once a Certificate of Completion (COC) is issued by NYSDEC and a Notice of Satisfaction (NOS) is issued by OER, and any required long-term institutional and engineering controls (if required) are in place.

C.108 The community continues to suffer from toxic waste resulting from 100 years of industrial activity, including the largest underground oil spill in the area. (Z. Skoric, E. Fidel, K. Yourke)

*Response: See response to **C.106** and **C.107.***

C.109 The site has a history of use as an oil refinery, bulk petroleum storage facility, manufactured gas plant, and rail yard. All projected and potential development sites have past or present uses involving some form of hazardous materials. Contamination will be mobilized and spread through excavation, dewatering, shoreline work, storm surges, and floodwaters. (Z. Skoric, E. Fidel, K. Yourke)

*Response: See response to **C.106** and **C.107**.*

C.110 The FEIS should clearly state how these risks will be prevented, monitored, and verified. The FEIS should commit to environmental site assessments, soil and groundwater testing, and remediation measures that will prevent mobilization of hazardous materials into soil,

groundwater, surface water, air, and adjacent public spaces. Mitigation must include dust control during construction and ongoing community air monitoring, and OER approvals must be in place before any temporary or final certificate of occupancy is issued. (Z. Skoric, E. Smyk-Fidel, K. Yourke)

*Response: See response to **C.106** and **C.107.***

C.111 The DEIS confirms contamination exceeding cleanup standards on both lots, including chlorinated VOCs in soil vapor. The subsurface investigation for Lot 25 dates to December 2017 and was conducted before significant shoreline erosion events. No Phase II environmental sampling has been conducted on the 56 Quay Street property. The DEIS relies on E-Designations and future BCP enrollment to manage contamination, deferring actual characterization and remediation to after approval. The Commission should not approve residential construction on a confirmed contaminated site without comprehensive, current Phase II sampling. (Resilient Red Hook)

*Response: See response to **C.106** and **C.107**. The (E)-Designation requires that testing and remediation be conducted under the oversight of NYC OER.*

C.112 The polluted land at 40 and 46 Quay Street requires remediation, but given the sensitive waterfront location with shallow underground waters and proximity to Bushwick Inlet, remediation must utilize bio-friendly methods such as bioremediation and phytoremediation, with sufficient time allowed for the soil to become non-toxic. If polluted soil is to be excavated, its disposal location must be considered, as dumping toxic soil elsewhere is unethical. Planting trees and vegetation to naturally decontaminate the soil would be preferable, allowing the space to become a true green open space. The three massive towers will significantly impact water wave height during extreme storms, as waves will be pushed back by the reinforced massive buildings with greater force, causing flooding to flow into lower-lying streets and houses on a much larger scale than already predicted. (E. Smyk-Fidel)

*Response: See response to **C.106** and **C.107.***

C.113 This project would require a Brownfield remediation. What is the projected range of cost of such a remediation, and how much of that cost would be covered by the taxpayers either (1) directly or (2) indirectly through tax incentives, rebates, or other means? How much, for how long, and by what methods are toxic materials expected to be transported from the site in the remediation process? (Save The Inlet)

Response: Comment noted.

The specific issues raised—projected remediation costs, allocation of costs between private and public sources, and tax incentive structures—are financial considerations that do not constitute environmental impacts under CEQR.

Regarding the transportation of toxic materials during remediation, any hazardous materials will be remediated and transported from the site in accordance with applicable city, state, and federal regulations.

Water and Sewer Infrastructure

C.114 The project will overburden sewer capacity and infrastructure constraints. The project would add approximately 3,000 residents to a neighborhood where infrastructure is already overextended, with no planned upgrades to the sewer system or stormwater management. The stormwater system is designed for only 1.75 inches per hour (regularly exceeded since

1995, with Hurricane Ida reaching 3.5 inches per hour). The increased density will burden already overwhelmed sewer infrastructure and evacuation routes. Has the proposed development adequately planned for its massive overloading of a sewer overflow system already at overcapacity? (M. Szczęsna, L. Treciokas, C. Kantin, Z. Skoric, F. Chilcott, H. Yang, L. Celentano, K. Yourke, B. Bello, A. Catchaturyan, S. Cahill, N. Shannon, S. Fraser, J. Beckwith, M. Bizzarri, S. Albrecht, D. Funkhouser, L. Goren, A. Odezynska, E. Jakubassa, M. Kura, E. Smyk-Fidel, Save The Inlet)

*Response: As detailed in EIS **Chapter 11, Water and Sewer Infrastructure**, the Proposed Actions would not result in a significant adverse impact to water and sewer infrastructure. See response to **C.94**.*

C.115 The neighborhood's sewer system is already overwhelmed by moderate rains, and New York City, while investing billions in shoreline remediation in lower Manhattan, has made no significant flood remediation investments on Greenpoint-Williamsburg's overdeveloped waterfront. The proposed development's hard edge podium design will channel surging floodwater further inland, causing billions of dollars of damage to neighborhood homes, businesses, and infrastructure. Has the proposal contributed to or harmed climate change preparedness and investment in long term infrastructure solutions for Greenpoint? (Save The Inlet, S. Fraser)

*Response: See response to **C.114** regarding sewer infrastructure. See response to **C.26** regarding consistency with the city's Waterfront Revitalization Program.*

C.116 The stormwater analysis acknowledges that projected flows exceed the CEQR 5% threshold, which requires further coordination with NYC DEP, yet the document still concludes that no significant impact will occur despite that coordination remaining incomplete. These are not minor procedural gaps on an ordinary site — they are unresolved infrastructure questions that directly bear on the health of one of Brooklyn's few remaining tidal ecosystems. (C. Caglioni)

*Response: As stated in EIS **Chapter 11, Water and Sewer Infrastructure**, although the 5 percent threshold is exceeded, these increments represent only a 0.011 to 0.060 percent increase of the Newtown Creek WRRF capacity. As the Proposed Actions would not cause the Newtown Creek WRRF to exceed its operational capacity, and the implementation of stormwater BMPs would prevent an increase in CSO events, the Proposed Actions would not result in a significant adverse impact on the City's sanitary sewage conveyance and treatment system, and further analysis is not warranted.*

C.117 How do the developers consider their project significantly increasing the volume of raw sewage that will be released into the inlet and East River via one of the Bushwick Inlet CSO outfalls, as viable stormwater mitigation? (S. Chesler) Have the Applicants studied how the extra wastewater generated by their development could potentially adversely affect marine life in these bodies of water and park goers who inhale air during these periods of released wastewater? (Save the Inlet)

*Response: See response to **C.115**. As concluded in EIS **Chapter 11, Water and Sewer Infrastructure**, sanitary sewage generated by the Proposed Development would discharge to the Newtown Creek WRRF. The projected increase in sanitary and stormwater flows would not cause the Newtown Creek WRRF to exceed its operational capacity or cause an increase in CSO events.*

C.118 For a project sited 50 feet from the East River, in a FEMA AE flood zone, using pre-2021 design storms as the basis for stormwater analysis is not conservative—it is an analytical failure. The Commission should require an analysis of how the project's stormwater increment interacts with CSO outfalls along Bushwick Inlet during extreme events. (Resilient Red Hook)

*Response: As detailed in EIS **Chapter 11, Water and Sewer Infrastructure**, stormwater flow volumes at the Development Site would decrease in the future with the Proposed Actions compared to existing conditions. The water and sewer infrastructure analyses were conducted in accordance with guidance in the CEQR Technical Manual and in consultation with DEP.*

C.119 Has the proposal adequately explained the feasibility of connecting the MP development to existing sewer infrastructure? (Save The Inlet)

*Response: As stated in EIS **Chapter 11, Water and Sewer Infrastructure**, the project will undergo the required review and approvals process with DEP for utility connections.*

C.120 Given that the project exceeds 400 residential units and is located within the Newtown Creek combined sewer drainage area, can DCP clarify whether a full detailed hydraulic analysis (not just preliminary analysis) was conducted, as recommended in the *CEQR Technical Manual* for areas of concern? (Save The Inlet)

*Response: EIS **Chapter 11, Water and Sewer Infrastructure**, reflects analyses prepared in accordance with the guidance of the CEQR Technical Manual and in consultation with DEP..*

C.121 The CEQR Technical Manual identifies Newtown Creek as a sensitive drainage area requiring infrastructure assessment. How does the DEIS account for this designation beyond standard threshold analysis? (Save The Inlet)

Response: The water and sewer infrastructure analyses were conducted in accordance with guidance in the CEQR Technical Manual and in consultation with DEP.

C.122 Has the study area appropriately included all downstream infrastructure components, including regulators, interceptors, and CSO outfalls such as NCB-004 and NCB-005? (Save The Inlet)

*Response: See response to **C.121**.*

C.123 The proposal also raises concerns around Combined Sewer Overflow (CSO) Impacts. During rain events, the NCB-004 CSO's are discharged in the Bushwick Inlet. The average discharge is 164 million gallons per year for the Bayside (Southside of mouth of the Bushwick inlet park site) and 19 million gallons per year for the Quay Street / Monitor Park site BEFORE the addition of the thousands of the proposed project's toilets and showers. (Save The Inlet)

*Response: The EIS includes an analysis of stormwater flow in accordance with CEQR methodology in **Chapter 11, Water and Sewer Infrastructure**.*

C.124 The DEIS concludes that the project would not result in a significant adverse impact because flows represent a small percentage of WRRF capacity. How does this conclusion account for localized CSO conditions, where impacts are driven by peak flow and storm events, not plant capacity alone? (For context, Greenpoint- Bushwick Creek Watershed is within the 12 ft flood zone, which was reached during Hurricane Sandy). (Save The Inlet)

*Response: The water and sewer infrastructure analyses were conducted in accordance with guidance in the CEQR Technical Manual and in consultation with DEP. As discussed in **Chapter 11, Water and Sewer Infrastructure**, the implementation of BMPs are required under NYC's Unified Storm Water Rule, which updated and aligned water quantity requirements in the city's combined sewer drainage areas with water quality requirements in separately sewered drainage areas, providing a comprehensive, citywide stormwater management policy for public and private development. BMPs required under the Unified Storm Water Rule include green and blue roofs, subsurface detention tanks*

and infiltration, and permeable pavement, each of which retain or release stormwater with slowed discharge rates to control peak runoff rates. With the incorporation of the required stormwater detention measures at the Proposed Development, stormwater flows to the CSO would be lower in the With Action condition as compared to existing conditions. Further analysis is outside the scope of CEQR.

C.125 Existing data indicates significant annual CSO discharge volumes at Bushwick Inlet and along Quay Street. How does the DEIS evaluate the project's contribution to cumulative CSO volumes and frequency, particularly during wet weather events? (Save The Inlet)

*Response: See response to **C.124**.*

C.126 Was CSO modeling conducted, as recommended in the CEQR Technical Manual when increases may exacerbate overflow events such as the recent extreme weather events? If not, why not? (Save The Inlet)

*Response: See response to **C.124**.*

C.127 Did the DEIS model cloudburst and other storm surge flooding impacts upon upland areas? If not, why not? (Save The Inlet)

*Response: See response to **C.124**.*

C.128 How does the project align with the City's Long-Term Control Plan (LTCP) commitments for Newtown Creek, which are intended to reduce—not increase—CSO discharges? (Save The Inlet)

*Response: See response to **C.124**.*

C.129 We ask the DCP to require detailed analysis under Peak Flow and Real-World Usage Scenarios. (We also refer you to Exhibits A – D showing the local sewer maps including the CSOs). (Save The Inlet)

*Response: See response to **C.124**.*

C.130 The analysis references average daily flow increases. How does the DEIS account for peak discharge scenarios, such as simultaneous residential usage (e.g., large-event usage spikes), which can stress combined sewer systems? (Save The Inlet)

Response: *See response to **C.124**.*

C.131 What assumptions were used for per capita wastewater generation, and how do these translate to total flows for approximately 1,100+ residential units? Did the study include anticipated new population density? (Save The Inlet)

*Response: See response to **C.124**. Further, the EIS describes water consumption and wastewater generation rate, which are established in Table 13-2 of **Chapter 11, Water and Sewer Infrastructure** of the 2025 CEQR Technical Manual and other sources that were reviewed by DEP in consultation with NYCDCP.*

C.132 Can DCP provide the maximum instantaneous flow estimates, rather than only daily averages? (Save The Inlet)

*Response: See response to **C.124**. Further, CEQR Technical Manual guidance instructs users to apply the rates from Table 13-2 of **Chapter 11, Water and Sewer Infrastructure** to predict the project's daily water demand based on the uses expected in the future With-Action Scenario.*

C.133 How does the analysis take into account expected as of right development nearby? According to CB1 there are 4,600 new as-of-right housing units being planned for West Street from Quay to Greenpoint Ave. From what we can see, these are not included in the modeling for impacts on sewer capacity demands. In addition, properties on Greenpoint Ave are being prepared to be sold or re-developed. CB1 estimates 15,000 new residents within a two-block radius of Monitor Point. (Save The Inlet)

Response: The CEQR Technical Manual advises that, when preparing an analysis of a proposed action's potential impact to existing wastewater and stormwater conveyance systems, the lead agency should obtain from DEP's Bureau of Environmental Planning and Analysis (BEPA) the projected future flows in the build year.. The analysis of the Proposed Actions relied on data obtained from DEP BEPA in accordance with the guidance of the CEQR Technical Manual.

C.134 The project discharges to a 36-inch combined sewer leading to a 66-inch pipe and downstream interceptors. What is the existing utilization rate and available capacity of these pipes during dry and wet weather conditions? (Save The Inlet)

*Response: As detailed in **Chapter 11, Water and Sewer Infrastructure**, the Proposed Development would increase sanitary sewage by 0.232 mgd, or approximately 0.075 percent of the Newtown Creek WRRF's total capacity of 310 mgd. As described in response to C.116, the Proposed Development would not cause the Newtown Creek WRRF to exceed its operational capacity. As described in response to C.124, stormwater flows to the CSO would be lower in the With Action condition as compared to existing conditions.*

C.135 Has a hydraulic capacity analysis been performed for the Franklin Street interceptor system, including the 96" x 90" interceptor, to confirm it can accommodate additional flows? (Save The Inlet)

Response: The FEIS does not include a hydraulic capacity analysis for the Franklin Street interceptor.

C.136 Will any off-site sewer upgrades or enlargements be required to accommodate the project? If so, where are these disclosed? (Save The Inlet)

*Response: As detailed in **Chapter 11, Water and Sewer Infrastructure**, the Proposed Development cannot obtain a sewer connection permit until DEP is satisfied that the combined sewer system can accept the stormwater and sanitary discharge from the site. Prior to obtaining a sewer connection permit, the Project Developer would be required to demonstrate that the City's sewer infrastructure can accept the proposed stormwater and sanitary discharge. As noted in the CEQR Technical Manual, DEP's sewer connection permitting process is an independent regulatory review through which DEP evaluates site-specific drainage conditions and determines whether any infrastructure modifications are required as a condition of permit issuance. In accordance with CEQR guidance, the applicant has been coordinating with DEP as design of the Proposed Development has progressed, and the applicant will continue to do so as it pursues a sewer connection permit.*

C.137 How will the addition of 15,000 new residents impact the demands on the capacity of the Franklin St interceptor system? (Save The Inlet)

*Response: See response to **C.133** and **C.135**.*

C.138 Recently, the city announced the redesign of the long-term control plan at Newtown Creek, a small waterway that separates Brooklyn and Queens and connects to the East River, causing delays in the reduction of combined sewer overflow into the creek. Though the redesign would lead to a 67 percent reduction in overflow into the creek, rather than 62 percent,

community leaders want to see further reductions if the project is to be delayed to 2040. How would this project further strain that system? (Save The Inlet)

*Response: As detailed in **Chapter 11, Water and Sewer Infrastructure**, no overflow from the Proposed Development would discharge into Newtown Creek. The NYCTA Relocation Site would incorporate low flow plumbing fixtures to reduce sanitary flow and include required stormwater BMPs in accordance with the Unified Storm Water Rule guidelines. The existing buildings on the NYCTA Relocation Site were developed prior to the Unified Storm Water Rule. With the Proposed Actions, the NYCTA Relocation Site would be brought into compliance with Unified Storm Water Rule guidelines as part of the redevelopment of the NYCTA Relocation Site. With such measures in place, the Proposed Actions do not have the potential for significant adverse impacts.*

C.139 There are concerns regarding Elevation, Pumping, and Flood Risk (see DEIS Chapter 11, p. 9 figure 11-1) (Save The Inlet)

*Response: See response to **C.121**.*

C.140 Does the DEIS model scenarios for 2040 (less than 25 years) when NYS predictions of sea-level rise is 23"? (Save The Inlet)

*Response: As described in response to **C.94,** the EIS relies on DEP's Flow Volume Calculation Matrix, which allows applicants to determine the volume and peak discharge rates of stormwater expected from the site in the future With Action scenario for a range of rainfall events.*

C.141 How will the sewer pipes from the west end of Quay connect to Franklin given the grade? (Save The Inlet)

Response: This comment is beyond the scope of CEQR.

C.142 Given the project's location within a combined sewer system, a designated drainage area of concern, and a flood-prone waterfront, Save the Inlet's position is that a more robust, site-specific, and future-oriented analysis is warranted to fully assess potential impacts on wastewater and stormwater infrastructure. (Save The Inlet)

*Response: See response to **C.121**.*

C.143 Given the location within the Bushwick Inlet watershed, was the site evaluated as part of a broader flood mitigation or stormwater capture strategy, similar to NYC's Cloudburst initiatives? (Save The Inlet)

*Response: As described in the response to **C140**, the FEIS relied on DEP's Flow Volume Calculation Matrix.*

Solid Waste and Sanitation Services

C.144 Existing residential density increases in the neighborhood have already created severe strain on the public realm. Luxury towers recently built in Greenpoint, which are far smaller in scale than Monitor Point, are generating massive amounts of waste and congestion that overwhelms sidewalks. Mountains of trash bags placed at the curb reduce pedestrian space by more than half, compounded by delivery trucks. Adding close to 3,000 new residents behind a 12-foot-wide path is not a viable solution. (N. Shannon, L. Celentano)

Response: The CEQR Technical Manual states that an assessment of solid waste and sanitation services is warranted if an action would have the potential to result in a substantial increase in solid waste production that could overburden available waste management capacity or otherwise be inconsistent

with the City's Solid Waste Management Plan (SWMP) or with state policy related to the City's integrated solid waste management system. According to the CEQR Technical Manual, actions resulting in substantial waste generation, defined as 50 tons (100,000 pounds) per week or more, warrant additional analysis for effects on solid waste and sanitation services. The Proposed Actions would result in an increase in 25.77 tons, which would not exceed the 50 tons per week threshold for further analysis. As such, per CEQR Technical Manual Guidance, an assessment of solid waste and sanitation services is not warranted and was therefore not included in the EIS.

Transportation

C.145 The neighborhood lacks the transportation infrastructure needed to support the volume of new residents a large residential building would bring. The subways are already over capacity. (E. Delora, M. Giavazzi, C. Dunn, S. Chesler, J. Mraz)

Response: As detailed in EIS ***Chapter 12, Transportation****, the subway station analysis determined that the fare control areas and stairways analyzed at both the Greenpoint Ave and the Nassau Ave stations would operate at acceptable levels of service during both peak hours, therefore the Proposed Actions would not result in significant impacts to these subway stations. A line haul analysis was conducted for the G subway line and determined that subway line haul would be below the capacity at the maximum load-point. Therefore, the Proposed Actions would not result in significant impacts to subway line-haul conditions.*

C.146 The projected 1,200 residential units will bring approximately 3,000-4,000 residents with at least 1,000 cars and countless delivery trucks servicing the residents, resulting in increased traffic, noise, and pollution around the towers during both construction and exploitation of the development. (E. Smyk-Fidel)

Response: As described in EIS **Chapter 12, Transportation***, detailed traffic, and parking analyses were conducted in accordance with CEQR Technical Manual guidelines. Traffic analyses were conducted for 13 intersections. The Proposed Development would generate between 179 and 287 peak hour vehicle trips (inbound and outbound combined), including between 2 and 8 peak hour delivery trips. The Proposed Development would result in significant adverse traffic impacts to four intersections during the weekday AM peak hour, four intersections during the weekday midday peak hour, five intersections during the weekday PM peak hour, and five intersections) during the Saturday peak hour. Standard traffic capacity improvements typically implemented by the New York City Department of Transportation could mitigate traffic impacts at two intersections during the weekday AM peak hour, three intersections during the weekday midday peak hour, four intersections during the weekday PM peak hour, and two intersections during the Saturday peak hour. Significant traffic impacts to the intersections listed below would remain unmitigated:*

- *Franklin Street and Quay Street (weekday midday, weekday PM, and Saturday peak hours)*
- *Franklin Street and Greenpoint Avenue (weekday AM peak hour)*
- *McGuinness Boulevard and Greenpoint Avenue (Saturday peak hour)*
- *West Street and Oak Street (weekday AM peak hour)*
- *Franklin Street and Milton Street (Saturday peak hour)*

The Proposed Development would have a peak parking demand of up to 403 spaces (during overnight periods), and would include a 140 space below-grade parking garage. The available parking capacity (on-site plus off-site and on-street) would be sufficient to accommodate project demand.

*As described in EIS **Chapter 18, Construction**, during the peak construction period, construction activity would generate between 293 and 309 peak hour vehicle trips and 13 intersections were analyzed for potential significant traffic impacts during the construction traffic peak hours. Significant impacts were identified at three intersections during the weekday AM construction peak hour and four intersections during the weekday PM construction peak hour. Significant traffic impacts could be fully mitigated at the three significantly impacted intersections during the weekday AM construction peak hour and three of the four significantly impacted intersections during the PM construction peak hour (one intersection would remain unmitigated in the PM peak hour).*

*As described in EIS **Chapter 13, Air Quality**, and **Chapter 15, Noise**, the project would not result in operational noise or air quality impacts. Further, EIS **Chapter 18, Construction**, describes that there would be no air quality impacts; however, the EIS discloses a construction noise impact at an adjacent receptor.*

C.147 The DEIS transportation data is outdated, relying on 2015-2019 ACS Journey-to-Work data, and the DEIS itself admits the transportation data was collected prior to implementation of the Congestion Pricing program. As a result, the DEIS appears to underestimate subway usage during peak hours. Habits have drastically changed and people are back in offices. The MTA should confirm that all DEIS data will be current, post-Covid, and will reflect the recent surge in ridership due to congestion pricing, tourism, and continual growth. Subject to the MTA Open Data Act, the DEIS data should be accurate, up to date, and easily available to the public. (D. Funkhouser)

*Response: As described in EIS **Chapter 12, Transportation**, the travel demand factors used to calculate the projected number of trips for the Proposed Development were obtained primarily from the CEQR Technical Manual, 2015-2019 US Census American Community Survey (ACS) journey-to-work (JTW) data, survey data provided by the New York City Department of Transportation (NYC DOT), and environmental assessments prepared for projects with similar proposed uses. See **Chapter 12, Transportation** for the full analysis. All factors used in the travel demand analyses were reviewed and approved by NYC DOT in consultation with DCP, as Lead Agency. The use of the 2015-2019 5-year data set from the American Community Survey is consistent with NYC DOT travel demand forecasting guidance for environmental reviews as it is the latest set of available data that does not include the atypical years of 2020 and 2021 (COVID-19 years). The ACS data is updated annually; however, the latest 5-year data set reflects the period of 2020 to 2024. As stated in **Table 12-21**, the subway line-haul analyses reflect 2025 ridership and train throughput data from NYCT (NYC Transit).*

C.148 The transportation analysis confirms that the G train is already operating at over-capacity conditions in the peak direction during both AM and PM peak hours. Adding 1,150 new units to a transit system already operating above capacity, in a neighborhood the DEIS itself identifies as within the Inner Transit Zone, is inconsistent with transit-oriented development principles. (Resilient Red Hook)

*Response: As detailed in EIS **Chapter 12, Transportation**, the existing conditions subway line-haul analysis concludes that the G subway line operates below capacity at the maximum load point in both directions during the weekday AM and PM peak hours. In the future with the Proposed Actions, the analysis concludes that the G subway line would continue to operate below capacity during the weekday AM and PM peak hours in both directions. See **Chapter 12, Transportation** for the full*

analysis. Note, the subway line haul analysis was updated in the EIS to reflect the line-haul capacity guidelines rate for 60-foot-long subway cars consistent with Table 16-8 of the 2025 CEQR Technical Manual.

C.149 By studying only two stations on the G train and omitting the L train, the DEIS severely neglects to include the main way the community gets into Manhattan or travels deeper into Brooklyn. The MTA and Gotham should perform a Level 2 study on the burden this density would place on the L train, including the cumulative impact of all other new construction on the transit system. (I. Marx, A. Odezynska, D. Funkhouser, J. Zdziaszek, L. Roper, S. Konekeo)

*Response: According to the travel demand forecast detailed in EIS **Chapter 12, Transportation**, the Proposed Development would generate 594 and 596 subway person trips (inbound and outbound combined) during the weekday AM and PM commuter peak hours, respectively. The EIS subway analyses were conducted for the subway stations and the line nearest to the Development Site - Greenpoint Ave and Nassau Ave stations and the G subway line. The scope of the subway station and subway line-haul analyses were determined in consultation with NYCT and are consistent with CEQR Technical Manual guidelines.*

C.150 Approval of thousands of new residents at a site far from public transportation without investing in safe walking and biking access would repeat planning mistakes. The bike lane and sidewalks along Kent Avenue and Quay Street should be widened to meet greenway standards and accommodate high pedestrian activity, the bike connection along Quay to the street end should be completed with street parking on the southern curb removed so cyclists are not forced into gaps or vehicle conflicts, a capital commitment should be provided to build out a permanent portion of the Brooklyn Waterfront Greenway between Clymer and N. 14th Street as part of this project, and stronger pedestrianization should be created at the street ends leading to the waterfront with raised crosswalks, curb extensions, and other traffic-calming measures. Quay Street should not be connected to Wharf Drive for cut-through traffic as doing so would invite additional car traffic onto small waterfront street ends that should prioritize people, and the proposed parking garage capacity should be reduced since excessive parking encourages additional car trips and increased local traffic rather than prioritizing sustainable transportation. (M. Szczęsna, E. Adams, S. Chesler)

*Response: As detailed in EIS **Chapter 12, Transportation**, the south sidewalk along Quay Street west of Franklin Street and abutting the Development Site would operate within acceptable level of service and would not be significantly impacted by the Proposed Development. The traffic and pedestrian study areas were determined in accordance with the CEQR Technical Manual and in coordination with NYC DOT. Construction of the Proposed Development would not result in the removal of the existing bike lane along Quay Street. Design of Quay Street between Franklin Street and the west end of the future street segment would be coordinated with NYC DOT. Access to Wharf Drive from Quay Street will be maintained. The Proposed Development would provide bicycle storage for residents to support the use of bicycles. A 140 space below grade parking garage is proposed on the Development Site. The parking analysis conducted in the EIS shows that the project's parking demand would not be fully accommodated on-site. However, it was determined that there would be sufficient off-street and on-street parking availability within the quarter-mile study area to accommodate the additional demand not accommodated by the on-site garage.*

A capital commitment to fund construction of the Brooklyn Waterfront Greenway is beyond the scope of the analysis recommended by the CEQR Technical Manual.

C.151 The project will add to a subway capacity problem for the G and L lines that is predicted with the onset of massive developments from the OneLIC in Queens, River Ring, and Domino projects in North Brooklyn. (S. Chesler)

*Response: As detailed in EIS **Chapter 12, Transportation,** a detailed analysis of subway infrastructure during the commuter peak hours was conducted to determine the Proposed Action's potential to result in significant adverse impacts. Fare control areas and stairways were analyzed at the stations closest to the Development Site—the Greenpoint Avenue station and Nassau Avenue station (both served by the G subway line). A subway line haul analysis of the G subway line was also conducted. These analyses determined that the Proposed Actions would not result in significant impacts to the subway stations and subway line analyzed.*

C.152 Since the redesign of McGuinness Boulevard with its reduction of traffic lanes on both sides of the roadway, side streets are experiencing a major increase in car volume. Development of the Monitor Point project will exacerbate this problem. (S. Chesler)

*Response: As detailed in EIS **Chapter 12, Transportation**, traffic analyses were conducted for 13 intersections. The Proposed Development would result in significant adverse traffic impacts to four intersections (at six specific traffic movements) during the weekday AM peak hour, four intersections (at six specific traffic movements) during the weekday midday peak hour, five intersections (at nine specific traffic movements) during the weekday PM peak hour, and five intersections (at seven specific traffic movements) during the Saturday peak hour (see also response to **C.146**).*

*It was determined that significant impacts would occur at the intersection of McGuinness Boulevard and Greenpoint Avenue during all four peak hours analyzed. The eastbound approach would be impacted during all four peak hours analyzed. The westbound left-turn movement would be impacted during the weekday AM and weekday PM peak hours. The westbound shared through-right movement would be impacted during the weekday midday, weekday PM, and Saturday peak hours. Significant impacts during the weekday AM, weekday midday, and weekday PM peak hours could be mitigated via signal timing modifications. The impacts during the Saturday peak hour would remain unmitigated. Mitigation measures that could be implemented to mitigate these significant adverse traffic impacts are discussed in EIS **Chapter 19, Mitigation**.*

C.153 How will this project compound the negative traffic consequences of post-redesigned McGuinness Boulevard? (S. Chesler)

*Response: See response to **C.152**.*

C.154 Given that Lot 1 is owned by the MTA, we expect that the environmental assessment would include any impact on the MTA's existing infrastructure including the nearest two train stations. If that is not so, please state so clearly. (Save The Inlet)

*Response: See response to **C.151**.*

C.155 The DEIS projects the development will add approximately 4 passengers per subway car during peak hours—just below the 5-passenger threshold for "significant impact." However, the G line already operates at or over capacity during peak hours, making any additional crowding more burdensome than the threshold suggests. Given that the project site is MTA-owned property, why does the proposal include no mitigation measures to address the development's contribution to subway overcrowding? (Save The Inlet)

*Response: See response to **C.151**. Per CEQR Technical Manual guidance, mitigation measures are only required where significant adverse impacts are identified.*

Air Quality

C.156 The project will negatively impact air quality in the neighborhood and will contribute to continued pollution of the waterway. Open green space is the answer to reduce air pollution, not another high rise building. More trees are needed. (L. Celentano)

*Response: As detailed in **Chapter 13, Air Quality**, the analyses determined that the Proposed Actions would not result in significant adverse air quality impacts on the surrounding sensitive receptors, nor would nearby emission sources significantly impact the Proposed Development. Because the Applicant would commit to using electric HVAC and hot water systems for the Proposed Development, a stationary source analysis is not warranted, and no significant adverse impacts would occur. A Restrictive Declaration (RD) would be recorded against the Development Site to ensure this commitment.*

Regarding the NYCTA Relocation Site, a screening analysis determined that there would be no potential significant adverse air quality impacts from fossil fuel-fired heat and hot water systems at the NYCTA Relocation Site if the stack height is located at the highest tier and at least 55 feet above grade. An (E)-Designation (E-870) would be placed on the NYCTA Relocation Site to ensure that the assumptions used in the analysis to preclude the potential for significant adverse impacts are met.

Noise

C.157 The projected 1,200 residential units will bring increased noise around the towers during both construction and ongoing after completion of the development. (E. Smyk-Fidel)

*Response: **Chapter 15, Noise** provides an assessment of the potential for the Proposed Actions to significantly increase sound levels from mobile and stationary sources at noise receptors, and if the new noise receptors that would be introduced would be in an acceptable ambient sound level environment.*

The Proposed Development would not cause a significant adverse vehicular noise impact because it would not generate sufficient vehicular traffic in the vicinity of noise receptors to increase in the With-Action noise level above the 3-dBA threshold for significance per the CEQR Technical Manual.

The Proposed Development is not anticipated to include any substantial stationary source noise generators because the building's mechanical equipment would incorporate sufficient noise reduction devices that would comply with applicable noise regulations and standards, including the standards contained in the revised New York City Noise Control Code.

The Proposed Development would not create a significant adverse noise impact on new noise receptors because the Proposed Development will incorporate a minimum outdoor-to-indoor window/wall sound attenuation of 28 dBA for all façades of all three proposed buildings, maintaining acceptable interior noise conditions per the CEQR Technical Manual noise exposure guidelines for residential and community facility uses. To implement this attenuation requirement, a Restrictive Declaration would be recorded against the Development Site specifying the appropriate amount of window/wall attenuation and the need for alternate means of ventilation.

The noise levels in the proposed public open space would exceed the 55 dBA (L_{10}) CEQR guidelines, but would be comparable to noise levels at other parks throughout New York City. Therefore, the future projected noise levels would not constitute a significant adverse noise impact to the proposed public open space areas.

*As detailed in **Chapter 18, Construction**, construction noise from mobile sources would not increase by 3 A-weighted decibels (dBA) or more, and there would be no significant adverse noise impacts at the existing and future receptors due to construction mobile sources.*

Since construction noise levels would exceed the thresholds for exterior increase in noise as well as the thresholds for acceptable interior noise levels for residential uses, there would be potential for construction of the Proposed Development to result in significant adverse construction noise impacts at 3 West Street, which is located across the street from the Development Site. No construction noise impact would occur at other receptors analyzed.

Public Health

C.158 Chapter 16 (Public Health) of the Draft Environmental Impact Statement fails to meet the level of scrutiny demanded by a project of this scale on an ecologically sensitive waterfront parcel. The public health chapter exemplifies this problem through circular reasoning: it first claims no formal public health analysis is required because no significant unmitigated adverse impacts were found elsewhere in the DEIS, then conducts a public health analysis anyway — but only superficially. This self-referential compliance approach allows meaningful ecological and community harm to go unexamined. (C. Caglioni)

*Response: An assessment of public health was conducted in **Chapter 16, Public Health** of the EIS pursuant to CEQR Technical Manual guidance and in accordance with the Draft Scope of Work for the EIS, which was reviewed by the public, as well as the lead agency. Per CEQR guidance, when other CEQR analysis areas related to public health—such as air quality, noise, hazardous materials, or water quality—identify significant unmitigated adverse impacts, the lead agency may determine that a public health assessment is warranted for that specific technical area. For example, if a significant adverse unmitigated air quality impact was identified, a public health analysis of air quality would likely be appropriate. Per CEQR Technical Manual guidance, a public health assessment does not consider open space ratios.*

The assessments in the contributing chapters of the EIS concluded that the Proposed Actions would not result in any significant adverse public health impacts as defined by CEQR Technical Manual guidance. While significant adverse noise impacts could occur during construction, these would be temporary impacts resulting from conditions that are common during the construction of high-rise buildings in New York City, and would not be high enough to constitute a public health concern. Consequently, construction of the Proposed Development would not result in a significant adverse public health impact. As such, further assessment of public health impacts is not warranted.

C.159 The World Health Organization recommends a minimum of 9 square meters of open space per capita, with an ideal of 50 square meters per capita, for optimum public health, and those areas should be within .2 miles of any resident. While NYC as a whole was around the bare minimum in 2025 for square footage, North Brooklyn remains under 1 square meter per capita, also with access issues. Adding a significant number of people to North Brooklyn, which this development aims to do, will take the area further from the bare minimum 9 square meters per capita. The benefits of this amount of open space per capita are well documented and researched, including increased activity, reduced instances of cardiovascular, metabolic, and mental health conditions, and increased overall health. (L. Celentano)

Response: The analyses prepared are consistent with the guidance of the CEQR Technical Manual, which sets forth the accepted methodologies for analyzing the impacts of actions subject to CEQR.

Neighborhood Character

C.160 The proposed development is drastically out of scale with the surrounding neighborhood and the sensitive ecological context of Bushwick Inlet. The excessive density will strain existing infrastructure, exacerbate congestion, and fundamentally alter the character of Greenpoint. The project threatens to undermine the historic character and working class feel of what remains of Williamsburg and Greenpoint. (R. Colucci, D. Marker, S. Chesler)

*Response: An assessment of neighborhood character is provided in **Chapter 17, Neighborhood Character** of the EIS in accordance with the guidelines outlined in the CEQR Technical Manual. The assessment concludes that the impacts related to increased noise during the construction period, and increased traffic and pedestrians in the operational and construction periods, would not result in a significant adverse impact to the defining elements of neighborhood character, nor any of the defining features. Additionally, the analysis of neighborhood character concludes that there would be no potential for a significant adverse neighborhood character impact to occur as a result of a combination of the significant adverse impacts discussed above and the moderate (i.e., not significant) effects as to other issues of environmental concern assessed in this EIS.*

C.161 The scale of the proposed development would destroy the character of this parcel of land and have a catastrophic impact on the surrounding environment. Bringing so many more people into this area would introduce extraordinary density to a neighborhood already facing pressure on infrastructure, open space, and quality of life. Greenpoint is facing several other large development proposals, and the cumulative impact on overall livability is a serious concern — while projects may be reviewed individually, residents experience their impacts collectively. (K. Yourke, C. Dunn)

*Response: See response to **C.160**. As described in **Chapter 17, Neighborhood Character**, and as discussed in the contributing chapters (i.e., **Land Use, Zoning, and Public Policy**; **Socioeconomic Conditions**; **Community Facilities**; **Open Space**; **Historic and Cultural Resources**; **Urban Design and Visual Resources**; **Shadows**; **Transportation**; and **Noise**), there would be no potential for a significant adverse neighborhood character impact to occur as a result of a combination of the significant adverse impacts discussed above and the moderate (i.e., not significant) effects as to other issues of environmental concern assessed in this EIS.*

Construction

C.162 The report acknowledges a significant adverse construction noise impact on nearby residents but dismisses it as temporary. However, characterizing it as temporary is misleading and unjustified, given that the project will likely span over a year, encompassing demolition, pre-construction, and completion of the towers. (C. Caglioni)

*Response: The construction noise analysis, provided in **Chapter 18, Construction**, concludes that, because construction noise levels would exceed the CEQR Technical Manual thresholds for exterior increase in noise as well as the thresholds for acceptable interior noise levels for residential uses, there would be potential for construction of the Proposed Development to result in significant adverse construction noise impacts at 3 West Street, which is located across the street from the Development Site. The analysis followed guidance from the 2025 CEQR Technical Manual, which advises that the temporary and transient nature of construction impacts, the affected area, the magnitudes, and the duration of the impacts should be considered when reaching a final determination. Where construction noise impacts are disclosed by an EIS, CEQR guidance advises that an applicant incorporates noise reduction measures for construction activities. Consistent with this guidance and the requirements of*

the New York City Noise Control Code, the Proposed Development would include implementation of a Construction Noise Mitigation Plan.

No construction noise impact would occur at other receptors analyzed.

C.163 Construction of Monitor Point will negatively affect air quality for years to come. Greenpoint's heavy industrial past will be problematic during foundation preparation, stirring up pollutants that will pour directly into the river and the sensitive ecology of Bushwick Inlet. Living on the waterfront will be miserable for the next 10 years while the air is polluted and residents are disturbed with noise and construction hazards. (A. Odezynska, M. Szczęsna, E. Jakubassa, M. Abramson, Z. Raphael, S. Chesler)

*Response: The potential for construction-period air quality impacts was assessed in EIS **Chapter 18, Construction**. An analysis of on-site emissions (consisting of construction equipment, trucks, and fugitive dust) for the peak construction period was conducted. A detailed mobile source analysis was also conducted to evaluate the impacts from off-site construction traffic. The results of the on-site construction air quality assessment indicate that the Proposed Development would not exceed the applicable air quality standards and de minimis criteria. The off-site dispersion modeling analysis determined that particulate matter ($PM_{2.5}$), and carbon monoxide (CO) concentrations would be below their corresponding de minimis thresholds or National Air Quality Ambient Standards (NAAQS), respectively. Additionally, if contractors choose to use older diesel equipment, the use of diesel particulate filters (DPF) in Tier 3 emission standard for diesel engines (model years 2006-2011 for engine sizes between 50 and 600 hp) would be implemented. Tier 3 with DPF achieves the same $PM_{2.5}$ emission reductions as a newer Tier 4 emission standard for diesel engines. The Tier 3 engines with DPF would achieve diesel particulate matter (DPM) reductions of approximately 90 percent when compared to older uncontrolled engines. This construction air quality control measure would be implemented as a Project Component Related to the Environment (PCRE) to reduce air pollutant emissions and avoid the potential for significant adverse air quality impacts during construction. Therefore, construction of the Proposed Development would not result in significant adverse air quality impacts due to construction sources.*

Additionally, NYSDEC regulates disposal of hazardous materials, and construction, operation, and removal of bulk petroleum and chemical storage tanks. NYSDEC also regulates discharge of water into rivers and streams. Construction of the Proposed Development would comply with these regulations.

C.164 Bushwick Inlet is an ecological jewel — once a tidal marsh — and the restored shoreline with rip rap, native plantings, and tidal marsh represents years of hard-won progress that this proposal threatens to undo. Numerous species, flora and fauna, call Bushwick Inlet home and will be displaced by construction. (L. Celentano, N. Shannon)

*Response: As stated in **Chapter 18, Construction**, construction of the Proposed Development would result in minor, temporary displacement effects to resident terrestrial wildlife at the Development Site and aquatic fauna within Bushwick Inlet and the East River, including potential temporary effects to habitat for Atlantic Sturgeon and Shortnose Sturgeon that are known to occur within the East River, but have not been confirmed locally. Similar to the effects of the current waterfront construction and installation of vegetated wetland and upland habitats within and adjacent to Bushwick Inlet at the Motiva Parcel of Bushwick Inlet Park adjacent to the Development Site, such effects would be avoided or minimized with the implementation of BMPs and adherence to regulatory agency permitting requirements during construction. Following implementation of the Proposed Development, improvements to habitat quantity and quality, as well as wildlife species diversity are expected, and*

many local species, including birds and other terrestrial wildlife, may experience increases in individual population densities due to expanded habitat opportunities.

C.165 Drilling to install building foundations raises concerns about destabilizing adjacent land features on the Motiva parcel, including shoreline protections such as riprap, marshlands, and berms, particularly given the area's low-lying, saturated geography and the proximity of the construction activities. There are concerns about displacing water further inland, as well as issues with the foundations themselves. Hitting bedrock is dangerous and unpredictable given the number of high-rise stories involved. (S. Roberts, M. Szczesna, S. Chesler)

*Response: As stated in **Chapter 18, Construction**, the New York City Department of Buildings (DOB) has primary oversight of construction. DOB oversees compliance with the New York City Building Code to ensure that buildings are structurally, electrically, and mechanically safe. In addition, DOB enforces safety regulations to protect both workers and the general public during construction. Areas of oversight include installation and operation of equipment such as cranes and lifts, sidewalk sheds, safety netting, and scaffolding.*

Drilling of foundations is an approved and common method of foundation installation in New York City. Foundation installation techniques which include drilled methods as the means for advancing the installation often are chosen based on their reduced levels of vibration, thereby reducing the potential for adverse impacts on surrounding areas and neighboring structures. Drilled foundations can include the use of temporary or permanent casing which provides continuous excavation support during the foundation installation, combined with internal flush measures that remove drilled soils/rock within the cased portion of the installation, to minimize ground disturbance outside of the drilled hole. Bedrock will likely be encountered at least 50 to more than 100 ft below the existing ground surface, and it is likely that the new building foundations will need to derive their support in rock, as is the common practice for supporting many of the high-rise structures in NYC. The foundations and associated methods of installation will be suited to properly engage/excavate the subsurface rock as necessary to properly construct foundations that will satisfy the project design intent as well as NYC Building Code and New York City Department of Buildings requirements.

C.166 The grading and limits of disturbance will extend beyond the Monitor Point property line at multiple locations — at the upland connection pathway, the accessible ramp, and the western connection to the Motiva parcel — and it is unclear who will bear the cost of these off-site improvements. (N. Shannon)

Response: Comment noted. While this is beyond the scope of CEQR, agencies including NYC DOT, NYC Parks, and DOB will review the proposed construction documents.

C.167 During the remediation and construction phases of the project, how will exposure to construction-produced particulate matter and volatile organic compounds be addressed? How will the potential migration of contaminated groundwater and soil vapor into Bushwick Inlet Park and Bushwick Inlet be prevented, and how will humans, the inlet, and marine life be protected? (Save The Inlet)

*Response: See response to **C.106**.*

Similar to the effects of the current waterfront construction and installation of vegetated wetland and upland habitats within and adjacent to Bushwick Inlet at the Motiva Parcel of Bushwick Inlet Park adjacent to the Development Site, such effects would be avoided or minimized with the implementation of BMPs and adherence to regulatory agency permitting requirements during construction.

C.168 Please detail how many truckloads of concrete would be needed to build this development. (Save The Inlet)

*Response: The estimated number of average daily construction trucks per quarter throughout the construction period for the Proposed Development is provided in **Chapter 18, Construction**, consistent with CEQR guidance.*

C.169 During construction, how many trucks will be used on pour days, and how long will they idle in the construction area? How long will that aspect of the project last? What efforts will be made to protect the nearest school, PS 031, from the impact of these diesel trucks? (Save The Inlet)

Response: Consistent with CEQR guidance, the construction chapter of the EIS evaluates the potential for the construction of the Proposed Development to result in air quality impacts to adjacent sensitive receptors. Idling of vehicles will be regulated by applicable City regulations. No significant adverse air quality impacts related to construction have been identified in the EIS.

Mitigation

No comments were provided to this chapter.

Alternatives

C.170 The DEIS analyzes only three alternatives. This range is insufficient under SEQRA, which requires the EIS to evaluate a reasonable range of alternatives that could reduce or eliminate impacts while meeting the project's stated purpose. (Resilient Red Hook)

Response: The CEQR Technical Manual states that an EIS should consider a range of reasonable alternatives to the project that have the potential to reduce or eliminate a proposed project's impacts and that are feasible, considering the objectives and capabilities of the project sponsor. There is no prescribed number of alternatives that need to be examined. The only alternative required to be considered is the No-Action alternative and the lead agency exercises its discretion in selecting the remaining alternatives to be considered. The EIS considers the required No-Action alternative, as well as the Existing Zoning alternative and the No Unmitigated Significant Adverse Impact alternative.

C.171 A park should be built on this site instead of the proposal. The existing Greenpoint-Williamsburg Waterfront Open Space Master Plan, which has broad community support, should have been a required additional alternative in the DEIS. By limiting the DEIS to only two alternatives - the applicant's current proposal or no action - decades of community input on waterfront design alternatives for this space have been ignored. (D. Marker, J. Beckwith, M. Bizzarri, M. Flanagan)

Response: A park would not serve the project Purpose and Need, which is to enable the comprehensive redevelopment of a nonconforming industrial site, transforming it into a vibrant, mixed-use area with new open space and waterfront access for the public, market-rate and affordable residential units, new local retail opportunities, and a new museum.

C.172 Please specify what alternative uses of the site were considered that (1) do not involve variances to the existing zoning; or (2) would allow more open space on the site, or (3) would allow the MTA Lot 1 to become a park. If the answer to any of these options is none, please explain the rationale for not considering such an alternative. (Save the Inlet)

*Response: See response to **C.170**.*

C.173 The DEIS fails to analyze a Reduced Density Alternative where development occurs at R6 scale (or moderate upzoning to R7) with higher affordability, smaller towers, and no WPAA waiver—preserving the R6 buffer function. (Resilient Red Hook)

*Response: As detailed in EIS **Chapter 20, Alternatives**, an Existing Zoning Alternative is considered where the Applicants would seek MTA Board Approval (a discretionary action subject to SEQRA) to relocate the existing NYCTA Facility on Lot 1, facilitating a new development on the Development Site pursuant to the existing R6 and R6/C2-4 zoning district. The Existing Zoning Alternative could result in significant adverse impacts similar to those of the Proposed Actions; however, it would provide for significantly less housing and no affordable housing. Specifically, as described in the Transportation section of the Existing Zoning Alternative, an unmitigated significant adverse traffic impact would be generated by even a modest development program, i.e., 45 residential DUs or 1,150 gsf of local retail space. Further, many of the intended public benefits of the Proposed Actions would not be realized with the Existing Zoning Alternative.*

C.174 The current proposal would not fulfill the city's vision for this site established in the 2005 rezoning, as the Applicants seek a massive upzoning from the 2005 rezoning in place. Please provide an explanation of whether the Applicants considered using the site consistent with the current R6 zoning, and whether they considered a development without an upzoning feasible, and if not, why not. (Save The Inlet)

*Response: See response to **C.170** and **C.173**.*

C.175 The FEIS should be required to study a lower-bulk, park-forward alternative that restores and adapts the shoreline. (K. Yourke, N. Shannon, Save The Inlet)

*Response: See responses to **C.170** and **C.173**.*

C.176 The DEIS fails to analyze a 100% Affordable Alternative where development occurs at the proposed, or a reduced scale, with 100% permanently affordable housing, consistent with the Borough President's public-land standard. (Resilient Red Hook)

*Response: See response to **C.171**. Additionally, this alternative was not feasible considering the objectives and capabilities of the project sponsor.*

C.177 The DEIS fails to analyze a "Community Benefit Alternative" where development consists of a community-driven program incorporating park completion, deeply affordable housing, and public waterfront uses without luxury towers. (Resilient Red Hook)

*Response: See responses to **C.170** and **C.173**.*

C.178 The New York State Public Authorities Law allows the MTA to dispose the property to another government entity as an alternative to private real estate redevelopment-based revenue, lending itself to alternative uses for the site. Decision-makers should consider the potential for alternative uses on the 40 Quay site that the Public Authorities Law offers an opportunity for, which is supported by the nearly 5,000 signatures in the Save Inlet petition requesting this. (S. Chesler)

Response: Comment noted.

C.179 The DEIS fails to analyze a Park Acquisition Alternative where the MTA transfers 40 Quay Street to NYC Parks and the City acquires Lot 25 to complete Bushwick Inlet Park as promised in 2005. (Resilient Red Hook)

*Response: See response to **C.170**.*

C.180 Public land should provide shared open space that connects people to nature and offers storm resilience, rather than luxury development that increases overcrowding and financial pressure while diminishing the land's intrinsic public value. Save The Inlet urges the MTA to collaborate with government stakeholders to convert the 40 Quay site into public open space, which would address North Brooklyn's low open space ratio and provide nature-based storm protection. Funding sources such as the NYS Environmental Bond Act and federal, state, and city environmental grants could support creating resilient public open space, relocating MTA facilities, and assisting the Greenpoint Monitor Museum in stewarding their property consistent with their mission to educate the public about the Monitor ship's history and the neighborhood's industrial environmental legacy. (Save The Inlet)

Response: Comment noted.

Effects on Disadvantaged Communities

C.181 The proposed residential development—particularly affordable housing units—may disproportionately impact populations already vulnerable to environmental inequities and systemic racism. (S. Roberts)

Response: Section 8-0109(2)(k) of the New York State Environmental Conservation Law requires that Environmental Impact Statements (EISs) include a statement of the effects of the Proposed Actions on disadvantaged communities (DAC), including whether the action(s) may cause or increase a disproportionate pollution burden. As detailed in EIS ***Chapter 24, Effects on Disadvantaged Communities****, the Proposed Actions would not have significant adverse impacts related to their effects on disadvantaged communities. Based on the technical analyses presented in the EIS pursuant to CEQR Technical Manual guidance, the Proposed Actions would not have the potential to result in significant adverse impacts in any technical areas other than transportation (traffic and pedestrians) and construction (traffic, pedestrians, and noise). Construction impacts would be temporary and are typical for a project of this size, and operational traffic impacts would affect a limited number of intersections that would experience poor levels of service in the No-Action condition as well. Although not all transportation and construction impacts could be mitigated, none of these significant adverse impacts would cause or increase a disproportionate pollution burden on a DAC, either alone or in conjunction with other technical areas.*

Comments Received in Support of the Proposed Actions

The following organizations and members of the interested public submitted testimony in support of the Proposed Actions:

C.182 As a local business owner in Williamsburg for 25 years, I have seen firsthand how development has pushed people out due to pricing. The 40 percent permanent affordability is critical, as other developments lose their affordable status once tax abatements expire. These rents are significantly below market rate, and preserving over 1,000 units at these levels in this neighborhood is invaluable. The transformation of previously industrial sites, like the nearby Edge condominium development which replaced a trucking yard, shows how such projects can bring thousands of affordable and market rate homes to the community. (A. Barrocas)

C.183 As a union member, Local 79 will be on this project, supporting both housing development and workforce opportunities for our members. (A. Espinal)

C.184 The project will give the Greenpoint Monitor Museum a permanent home on the very land where the USS Monitor was constructed and launched, allowing it to continue and expand its

educational mission. As a roadshow instructor, I have seen firsthand how the Museum's programs bring Civil War history to life for local students. The Museum has been serving the community since 2001, and this proposal finally makes it possible to build the dedicated facility we have long needed. We don't want this important opportunity to pass us by. (A. Kirmss)

C.185 **As a resident of Brooklyn, housing is sorely needed as the city faces a housing crisis. The continual rise in housing costs makes it increasingly difficult to start and raise a family in the city. More supply is needed to address this, and while this project won't solve everything, it is a step in the right direction. (A. Mazza)**

C.186 **As a grassroots organization representing close to a thousand low-income tenants, we support Monitor Point because it will deliver approximately 460 units of deeply affordable housing desperately needed by low-income and fixed-income residents across North Brooklyn. This MTA site was promised for affordable housing nearly 20 years ago, and the community has been waiting long enough for that commitment to be fulfilled. Without safe and stable affordable housing, longtime community members will no longer be able to afford to live in the neighborhood, making open space and parks irrelevant to those who are displaced. (L. Rosero)**

C.187 **40% affordable housing is an incredible achievement and exactly the type of project the city needs more of. Demanding a higher percentage of affordability would waste public money better spent building housing in neighborhoods where market rate rents cannot cross-subsidize affordable units. If anything, the project should be even bigger. (B. Thypin)**

C.188 **I am in favor. (C. Hastick)**

C.189 **As a 50+ year-old nonprofit representing 250 private and public sector leaders, we strongly support Monitor Point as a model of public-private collaboration that delivers 1,150 mixed-income homes, with 40% permanently affordable, in a high-opportunity neighborhood. The project drives economic growth through construction jobs and long-term employment in operations, retail, and local businesses. It modernizes critical infrastructure by relocating MTA's industrial uses into a state-of-the-art facility, improving service for all New Yorkers. The creation of over 50,000 square feet of waterfront open space further strengthens the community and expands access to high-quality green space for residents and visitors alike. (C. Purkey)**

C.190 **As a Williamsburg native who was born and raised here, development is inevitable, so it's better to support a project that includes affordable housing. The rent increases have displaced me and my classmates, forcing us to leave the neighborhood we grew up in. Affordable housing would provide an opportunity to return to our community and reunite with the families and friends we left behind. (C. Queme)**

C.191 **As a five-generation Greenpoint resident with ancestral ties to the Continental Iron Works where the USS Monitor was built, preserving this history for future generations is deeply personal. Monitor Point offers the Greenpoint Monitor Museum its best opportunity to establish a permanent home on land it has owned since 2003. The project will create significant public waterfront open space, providing a missing link between Greenpoint and Williamsburg while connecting the community to the Monitor's legacy. We will also gain hundreds of units of affordable housing, making this an opportunity the community cannot afford to miss. (C. Szumski)**

C.192 **Monitor Point would add over 1,100 homes, including 460 permanently affordable apartments at 40–60% AMI, providing much-needed housing for working families, seniors, and long-term**

residents at risk of displacement. Displacement is happening because not enough housing is being built, and as a renter raising young children, the pressure of this housing market is felt personally. The project replaces a degraded industrial site generating diesel truck traffic, relocates the MTA facility to an appropriate industrial zone, and opens up long-inaccessible public waterfront space while making coastal resiliency investments. All of this is achieved through over $100 million in private investment without diverting resources from schools or community services. (C. Vaughan)

C.193 The project will create a permanent home for the Greenpoint Monitor Museum, honoring Brooklyn's Civil War legacy and ensuring it is remembered by future generations. The community will benefit from 1,150 new homes with 40% permanently affordable units for households at 40-60% AMI. The project transforms an underutilized industrial site into community assets, including 51,500 sf of waterfront open space connecting Bushwick Inlet Park to northern areas, without displacing any residents. Over $700 million in private investment will deliver affordable housing, open space, and infrastructure improvements the city needs. (D. Duffy)

C.194 As a nonprofit focused on advancing middle-class housing for 43 years, we are thrilled to support Monitor Point, which will create over 1,100 new homes including 460 permanently affordable units for working-class families being priced out of North Brooklyn. Not a single person will be displaced, as the site currently has no existing housing units. The project represents the largest investment in affordable housing on the North Brooklyn waterfront, bringing over 51,000 square feet of public waterfront open space and safer streets to the community. Families earning minimum wage will be able to afford apartments here, fostering economic diversity and helping address New York City's severe housing crisis. (D. McAllister)

C.195 As an affordable housing activist, the project's 400+ affordable units and 600 market-rate units address the city's desperate housing needs. The ongoing housing shortage has serious citywide consequences, including loss of political influence, foregone tax revenue, and displacement through gentrification. We need the City Planning Commission to look beyond parochial neighborhood interests and consider these broader impacts. Building this project is a necessary step toward solving a citywide problem. (D. Miller)

C.196 As a chamber of commerce representing Brooklyn's business community, we support Monitor Point because it will create hundreds of union construction jobs with local hiring commitments and minority/women-owned business participation. The 460 permanently affordable homes will allow teachers, healthcare workers, and service employees to live where they work, reducing turnover and supporting local consumer spending. The public-private partnership will deliver 50,000 square feet of waterfront parkland, safer streets, and a permanent Monitor Museum, transforming an underutilized industrial site into a productive mixed-use development. These investments will strengthen the economic ecosystem that Brooklyn businesses depend on. (D. Rabiner)

C.197 As the city's largest provider of affordable and supportive housing for formerly homeless individuals, we understand explicitly the challenges lower-income people face in finding housing, and how difficult it is to develop new affordable housing in New York City. Monitor Point will deliver over 1,100 desperately needed units across all income bands, including 460 permanent affordable units, giving families the ability to live the dream many of us take for granted. The developer has a proven track record of successfully combining affordability, thoughtful planning, and long-term public benefits. We are in a housing crisis, and projects like this need to move forward now. (D. Walsh)

C.198 **As organizations committed to open green space and safe streets in North Brooklyn, we support Monitor Point but urge the City to ensure it is accompanied by critical greenway and pedestrian and bike infrastructure. The Brooklyn Waterfront Greenway is already the fifth busiest bike lane in New York City, and thousands of new residents will depend on it for commuting, errands, and recreation. Waterfront access does not begin at the water's edge—it begins with the streets that bring people there, and approving this project without investing in safe walking and biking access would repeat the same planning mistakes that have left too many parts of the greenway incomplete and unsafe. We urge the Commission to require greenway-standard bike lanes, completed connections along Quay Street, reduced parking capacity, stronger pedestrianization at street ends, and a capital commitment to build out a permanent portion of the Brooklyn Waterfront Greenway as part of this project. (E. Adams)**

C.199 **As a lifelong Brooklyn and Greenpoint resident, the project will bring good-paying jobs to the community. Unlike other projects, Monitor Point gives back to the community. We should welcome new people to build their lives here, as change is part of life in New York, and everyone should be able to share in what makes Brooklyn special. (E. Auguste)**

C.200 **As a founding member of both the Greenpoint Monitor Museum and the Concerned Citizens of Greenpoint, this project represents a continuation of decades of environmental advocacy for the community. The proposal offers the best opportunity to restore the once-industrial shoreline, making it resilient and publicly accessible for the first time. The renewed waterfront will provide open space, native plantings, and an amphitheater where school and community groups can gather and learn. Monitor Point will also create a permanent home for the Museum, connecting Greenpoint's industrial past to its climate-resilient future. (E. Roncketti)**

C.201 **As a representative of over 500 organizations and 250,000 skilled tradespeople, the project's $700 million investment will generate hundreds of union construction jobs during construction and permanent positions once complete. Housing is sorely needed, and Monitor Point will deliver approximately 1,100 new apartments, with roughly 460 permanently affordable, helping address the city's housing crisis. The project will remediate contaminated land, strengthen the shoreline, and incorporate renewable energy, setting a high bar for sustainable, climate-ready development. By transforming an underutilized warehouse and opening the waterfront for public enjoyment, the community gains economic growth, affordable housing, and environmental stewardship in equal measure. (F. Clark)**

C.202 **As a community nonprofit with 51 years of experience developing affordable housing, we understand the complexities of creating this housing and recognize there is not enough subsidy to handle the vast amount of projects already in the city's pipeline. Low-income residents have voiced strong support for Monitor Point, as affordable housing is what has allowed them to stay in the community. The project's 40 percent real affordable low-income housing stands in contrast to waterfront developments permitted at 130 percent AMI under the city's rezoning, and is to be commended. (F. Lang)**

C.203 **As a lifelong Williamsburg resident, good job opportunities have historically been hard to come by, making it difficult to keep up with the cost of living. This project will bring housing and union jobs that can actually sustain families and help people stay in the neighborhood. Empty lots don't support families or fix the shoreline, but this project does. (F. Zarate)**

C.204 **As a market rate renter in North Brooklyn, I move every one to two years due to high rents. Adding apartments in Greenpoint, including 460 permanently affordable homes and 1,100 total units, takes pressure off existing housing stock and helps prevent neighbors from being forced to move further out. Even if I won't live in these apartments myself, new supply means someone will choose them instead of competing for existing units. While this project alone**

won't solve New York City's housing crisis, it makes an essential contribution to fixing it. (G. Dougherty)

C.205 As a lifelong Greenpoint resident with family roots dating to the 1850s, this site shares the historic launch location of the USS Monitor, the ship that saved the Union. The community has been promised a permanent museum home, and thousands of local children who have learned about this history are counting on us not to let them down. A no vote means no Monitor Museum. The MTA property is zoned R-6, meaning little to no affordable housing will be built there regardless, making approval of this project the clear path forward. (G. Weinmann)

C.206 As a former planner for the 2005 Greenpoint-Williamsburg waterfront rezoning, this proposal represents a rare opportunity to finally achieve the plan's long-delayed open space objectives. The project delivers multiple public benefits simultaneously — relocating MTA facilities, creating a Monitor Museum, completing waterfront open space, and adding over 400 affordable homes — with no viable alternative path to accomplish all of these goals. Calls to increase the affordable housing share ignore real fiscal trade-offs, as doing so would simply redirect limited city subsidies away from affordable housing in other communities. (H. Slatkin)

C.207 As a representative of over 400 organizations committed to affordable housing, we strongly support Monitor Point because it addresses multiple public goals in one unified plan, including MTA facility modernization, waterfront infrastructure, open space, and cultural preservation. The project's commitment to affordability is exceptional, with approximately 460 units at 40 percent of residential space for families at an average of 60 percent AMI, far exceeding mandatory inclusionary housing requirements. Projects like this are rare opportunities to tackle interconnected public needs in a coordinated way rather than through piecemeal efforts, making a substantial contribution to addressing New York's housing crisis. (I. Cehonski)

C.208 As a construction worker and union member, our members will have the opportunity to work on this project. The project will bring about 40 percent affordable housing, benefiting Brooklyn residents. The Bushwick Inlet area is currently overrun by trucks, and this development will allow the community to experience the beauty New York City has to offer. (I. Rodriguez)

C.209 As pro bono counsel for the Greenpoint Monitor Museum, the museum's land is privately owned and has never been designated as a park, with the city confirming in writing it is not seeking to acquire it. This application will provide the museum with sufficient funds to construct its building, transform its waterfront, and establish an endowment for ongoing operations. The shore public walkway will be redesigned to a minimum width of 40 feet in front of the museum, eliminating the need for any waivers. Community Board One voted with conditions to approve the application, reflecting the support of community members who are excited to see the museum come to life at the USS Monitor's birthplace. (J. Christy)

C.210 As a decade-long volunteer who has physically maintained the site at 56 Quay Street, the Greenpoint Monitor Museum deserves a permanent home on the very ground where the USS Monitor was built. The project will finally allow the Museum to construct its building, create publicly accessible waterfront open space with native plantings, and establish an endowment for future operations. The residential density is necessary to fund the Museum and will also deliver much-needed affordable housing for the city. Without this rezoning and the funding it enables, the Museum cannot be built, as current industrial zoning prohibits museum use on its own land. (J. Gregor)

C.211 **As a 25-year Greenpoint resident, I've watched friends and neighbors be priced out of the neighborhood. As a business owner employing around 50 people, only two or three of them can walk to work because they can't afford to live nearby. This project stands out from others by offering realistic affordability, with 460 units that would allow workers to live in the neighborhood where they work. (J. Hevert)**

C.212 **As a lifelong resident of Greenpoint and co-founder of the Greenpoint Monitor Museum, the Monitor Point Project represents an opportunity to finally fulfill the purpose of the 2003 land donation from Motiva Enterprises, which was intended for a museum dedicated to the USS Monitor. The museum has been actively serving the community for 30 years, bringing history to local schools and partnering with the National Oceanic and Atmospheric Administration. The project would allow us to grow from a classroom-based program into a full museum on the very waterfront site where the USS Monitor was built and launched. (J. Lauletta-Weinmann)**

C.213 **Housing is sorely needed, and the project will deliver deeply affordable units for low-income families at 30 to 50 percent AMI who currently have no voice in this process. As a resident of a 50 percent AMI waterfront unit, I can attest to the life-changing impact affordable housing has on families who have spent years underhoused and rent burdened. The nearly 300 permanently affordable units at Monitor Point represent hundreds of households who will benefit, and their future need outweighs the opposition. We should not let a petition of 5,300 signatures stand in the way of tens of thousands of applicants who will seek these homes through Housing Connect. (J. Suarez)**

C.214 **As a large property services union, we support responsible developers who invest in communities, and Gotham Organization has made a credible commitment to creating prevailing wage jobs for permanent building staff. This development aligns with the 2025 Brooklyn Borough President's Comprehensive Plan, which identifies the neighborhood as a priority area for new capacity. Community Board 1 ranked in the bottom half for affordable housing production across Brooklyn from 2014 to 2024, making this a critical opportunity for heavily affordable development and good jobs. (K. Banks)**

C.215 **As the treasurer of the Greenpoint Monitor Museum, Monitor Point represents the culmination of over two decades of work and will finally provide the Museum with the financial resources it needs to construct its building, stabilize its shoreline, and create an endowment for long-term operations. The community would benefit from affordable housing, expanded waterfront open space, and a museum that preserves the important history of Greenpoint for future generations. As a retired NYC teacher, I know the museum will offer students from across the city hands-on learning experiences connected to their local history. Without this project, nothing changes — no affordable housing, no museum, and no added open space. (K. Olszewski)**

C.216 **As a construction worker and union member, our members will have the opportunity to work on this project. The project will bring about 40 percent affordable housing, benefiting Brooklyn residents. The Bushwick Inlet area is currently overrun by trucks, and this project will allow the community to see the beauty that New York City has to offer. (L. Celentano)**

C.217 **The proposal would deliver more than 400 affordable homes and new public waterfront park space where today there is only a dilapidated industrial facility, with no credible alternative plan to achieve better outcomes. As a long-time New Yorker, I believe the city has an essential need to grow its housing supply, as skyrocketing rents are the direct result of decades of failing to build enough homes. While it is understandable that some existing residents oppose new housing, this reflects a broader flaw in the ULURP process, where local opposition has**

driven the housing crisis citywide. Greenpoint has shown leadership in welcoming new housing, and approving this proposal is clearly the right choice for the borough and the city. (L. Lavanway)

C.218 As a chairwoman representing lifelong residents from Greenpoint to Williamsburg, Monitor Point is the only waterfront project offering 40 percent affordable housing at real affordable rates for working-class New Yorkers who live here today. Affordable housing should not be held hostage because the City refuses to fulfill its responsibility to fully fund Bushwick Inlet Park — these are separate issues that must both be addressed. The community deserves both truly affordable housing and the park, and the government has a responsibility to deliver both. (M. Morales)

C.219 As a lifelong resident and proud union member, working families and longtime residents are being priced out of Greenpoint, and this project offers affordable housing that working New Yorkers can actually live in. The project will create good-paying union construction and permanent jobs with strong wages, benefits, and protections that support families and strengthen the local economy. Greenpoint's waterfront has long been cut off from the community, and this project expands safe, accessible public waterfront space for families, seniors, and everyday residents to enjoy. (M. Vitolo)

C.220 As a lifelong Greenpointer and community organizer, the housing crisis is displacing lower-income residents, middle-income volunteers, and young adults who can't afford to stay in the neighborhood where they were born. The Monitor project addresses all three of these groups and is the best project proposed since the rezoning. The 40 percent affordable housing commitment is real and credible, requiring the developer to work with HPD to secure funding. We need more and better affordable housing, and hope the council and mayor's office can work with the developer to achieve 50 percent affordability. (N. Sheehan)

C.221 As a deputy director working with low-income, mostly Latinx residents facing displacement in Greenpoint, I have witnessed decades of harassment, lack of repairs, and forced displacement that has prevented hardworking tenants from returning to their community. Monitor Point is the only waterfront development that has publicly committed to 40 percent affordable housing on-site, which our community desperately needs. The developer was proactive in engaging both community organizations and members throughout the process. Our community cannot wait any longer for low-income housing, and this project delivers that commitment. (O. Guzman)

C.222 As a Brooklyn resident working in affordable and supportive housing, the city is in dire need of more housing, affordable apartments, public space, and transit improvements. Monitor Point offers a rare opportunity to address all of these at once through an efficient public-private partnership that alleviates taxpayer burden. The financing structure and scale enables a mixed-income community with far more affordable housing than typical MIH requirements, alongside transit improvements and waterfront open space. The community board's 24-9 vote in support demonstrates that the public sector successfully pushed the developer to maximize benefits for the community. (P. Mahdavi)

C.223 Housing is sorely needed, and Monitor Point will deliver 1,150 new homes with 40% permanently affordable units for households at 40-60% AMI. The project transforms an underutilized industrial site into community assets, including 51,500 sf of waterfront open space connecting Bushwick Inlet Park to northern areas, without displacing any residents. As a community, we benefit from over $700 million in private investment that funds infrastructure improvements, park maintenance, and the long-awaited Box Street Park. This rare public-

private partnership delivers the affordable housing, open space, and neighborhood improvements we need. (P. Pullo)

C.224 **As a hyper-local business organization serving North Brooklyn, we strongly support Monitor Point for the lasting benefits it will bring to our business community and neighborhood. The project will deliver much-needed housing alongside considerable economic benefits through job creation and small business growth. The conversion of a dated, underutilized industrial site — one that currently blocks waterfront access and brings heavy truck traffic through residential streets — into a dynamic mixed-use development with affordable housing, environmental remediation, flood protection, and thoughtfully designed open space is a compelling model for revitalization. We ask that the full scope of its economic contributions be considered for the workers who will build it, the families who will call it home, and the businesses that will serve it. (P. Samulski)**

C.225 **The project meets the mayor's affordability agenda and the Brooklyn Borough President's Comprehensive Plan, building housing for all affordability levels without displacing existing residents. The project will remove polluting truck traffic, clean up the environment, and open up an accessible waterfront. As an organizer for Local 79, the construction workers who will build this project are community members who live here, and their voices deserve to be heard. We cannot be exclusionary and pull up the ladder behind us — we have to build this community for everyone. (R. Brunotte)**

C.226 **At a time when New York City faces a historic housing shortage, Monitor Point will deliver 1,150 much-needed new homes, 460 of which will be permanently affordable at or below 65% AMI — rents that working families can actually afford. As a nonprofit with over fifty years in affordable housing finance, we recognize the ingenuity of this development in addressing housing, environmental, and waterfront concerns together. The project brings innovative open space, waterfront access, and environmental resiliency to North Brooklyn, representing a deep investment in the existing community. Since the site currently contains no housing, there is no risk of displacement or harm to existing residents. (R. E. Cestero)**

C.227 **As a long-time observer of the area, this feels like the last piece of the puzzle in completing the waterfront. New York City lacks the funds to build a park, so having Gotham fund this project is a gift to the people of Brooklyn. As a member of Local 79, my members would get work here, and the community would gain affordable housing, a park, and a museum. Honoring the USS Monitor with a dedicated museum is an excellent way to recognize the site's Civil War history. (R. Chattoo)**

C.228 **As a lifelong Greenpoint resident and U.S. Marine Corps Veteran, the story of the U.S.S. Monitor holds deep personal and community significance, representing innovation, ingenuity, and Brooklyn's pivotal role in the Civil War. The project will give the Greenpoint Monitor Museum the resources it needs to construct a permanent home and fund its operations. This is the Museum's most promising chance to become a reality, ensuring the story of the Monitor and the Greenpointers who built it can be shared with generations to come. (R. Kenny)**

C.229 **As an indigenous native of Brooklyn who has been displaced multiple times, affordable housing is desperately needed for families who have been pushed out of their communities. We need to prioritize people over parks, as without affordable housing, even green spaces will eventually fill with homeless residents. There are many people in New York City who cannot afford $7,000 rent and need real housing solutions. We should build as much affordable housing as possible to help families raise the next generation with stability and dignity. (R. Perez)**

C.230 Monitor Point is delivering 460 permanently affordable homes at AMI levels that are truly within reach for many families. Unlike market-rate units that require an income of $190,000 and charge $4,700 monthly for a two-bedroom, these units serve households earning $87,000 at 60% AMI and $58,000 at 40% AMI. As a current Williamsburg resident, the resulting rents of $2,200 and $1,400 for two-bedrooms represent a significant advantage for families in this market. (S. Andrews)

C.231 As a rent-stabilized tenant in Williamsburg, new construction has directly provided housing security and stability, and Monitor Point would extend that same benefit to 460 lower-income families. The project's mix of market-rate and affordable units is a practical funding model, where wealthier tenants' rents will cross-subsidize affordable homes, shoreline resiliency, and a public park. More rent-stabilized housing for working-class families will help combat economic and racial segregation in the neighborhood. The 2005 rezoning was never meant to be permanent, and with housing affordability far worse today, the community needs to build as much as possible to bring rents down. (S. Franchino)

C.232 Housing is sorely needed, and this project will help address the documented shortage affecting New Yorkers of all income levels. Concerns about the project destroying a tidal ecosystem are speculative and lack factual backing. Without Monitor Point, there is no identified funding for environmental resiliency work, making it the only viable path to restoring our coastal ecosystem. Those who care about the environment should support the project and partner with the builders to achieve both ecological restoration and new housing simultaneously. (S. Franchino)

C.233 As a lifelong NYCHA resident of Community Board 1, working-class people are struggling to find affordable housing without cramming into overcrowded apartments. A waterfront home can positively improve residents' morale and sense of belonging, helping to blend cultures rather than create division. The project's 40 percent affordable housing at a waterfront location is unprecedented and sets a standard we should refuse to go below, giving friends, families, and neighbors a chance to return to the community. We need more apartments to house our fellow community members, and this project represents an opportunity we cannot afford to squander. (S. Marrow)

C.234 As a community development professional with 25 years of experience, Monitor Point represents the best example of generating substantial public benefit with limited public subsidy dollars. The project delivers an unprecedented level of affordability on the Greenpoint waterfront, with 460 deeply affordable apartments for families who desperately need them. There is no Plan B for the MTA warehouse, the Monitor Museum, waterfront connectivity, or those 460 families — without this project, these benefits simply will not materialize. Greenpoint will only become less affordable and residents will continue to be displaced. (S. Short)

C.235 As a lifelong Greenpointer, the Monitor Point project represents a transformative win for our community on multiple fronts. The project will finally provide a permanent home for the Greenpoint Monitor Museum, whose educational programs have long enriched students' understanding of our neighborhood's Civil War history, while also attracting new visitors who will support local businesses. The development will deliver over 1,100 new housing units, including 460 permanently affordable homes, giving families the opportunity to stay and grow in Greenpoint, with added school enrollment bringing increased funding to local schools. The project will also create over 50,000 square feet of new public waterfront open space, connecting Bushwick Inlet Park to the broader Greenpoint waterfront and giving the community a unique historical landmark to enjoy for generations. (T. Olszewski)

C.236 As a former North Williamsburg resident who frequently used the greenway, the Monitor Point project is ideal for the site. Public waterfront access would greatly improve Quay Street, and the new mixed-income housing would benefit the neighborhood greatly. (W. Meehan)