NEW YORK CITY ENVIRONMENTAL QUALITY REVIEW
FINAL SCOPE OF WORK

RIVER NORTH (FORMERLY LIBERTY TOWERS)

CEQR NUMBER: 20DCP140R

170-208 RICHMOND TERRACE & 8-26 STUYVESANT PLACE

BOROUGH OF STATEN ISLAND



Prepared For:
Richmond SI Owner LLC
117 Avenue of the Americas
Manhattan, New York, 10036

Lead Agency:
NYC Department of City Planning
120 Broadway, 31st Floor
Manhattan, New York, 10271

Prepared By:
Langan Engineering, Environmental, Surveying, Landscape Architecture, and Geology D.P.C.
21 Penn Plaza
360 West 31st Street, 8th Floor
New York, New York 10001

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FINAL SCOPE OF WORK

1. Introduction

This document is the Final Scope of Work ("FSOW" or "Final Scope") for the River North Draft Environmental Impact Statement (DEIS). This FSOW incorporates changes that were made subsequent to publication of the Draft Scope of Work (DSOW). Revisions of the DSOW have been incorporated into this FSOW and are indicated by double-underlining of new text and ~~strikethrough~~ of deleted text. This Final Scope outlines the technical areas to be analyzed in the preparation of a Targeted Environmental Impact Statement (EIS) for the series of discretionary land use actions including a zoning map amendment, zoning text amendments, and a special permit (the "Proposed Actions") from the City Planning Commission (CPC). Richmond SI Owner LLC, the project Applicant, seeks the Proposed Actions to facilitate the development of a mixed use project comprising residential and commercial uses, open space, and accessory parking (the "Proposed Development") in the St. George neighborhood of Staten Island, Community District 1 (see Figure 1). This Final Scope outlines the technical areas to be analyzed and methodologies to be employed in a Targeted Environmental Impact Statement (EIS) for the Proposed Actions.

The Proposed Actions would facilitate the development of 911,752 gross square feet (gsf) of floor area within four buildings across two development sites. The Applicant's site ("Projected Development Site 1") would be developed with three buildings totaling 793,904 gsf. The Applicant also would develop an approximately 7,790 square foot (sf) privately owned public space next to the intersection of Stuyvesant Place and Hamilton Avenue. An additional site that is not controlled or under ownership of the Applicant ("Projected Development Site 2," see Figure 2) is projected to be developed as a result of the Proposed Actions.

The Proposed Actions are subject to City Environmental Quality Review (CEQR). The New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), is the lead agency for the environmental review.

Based on the Environmental Assessment Statement (EAS) dated 16 October 2020, DCP has issued a Positive Declaration requiring further analysis for several CEQR technical areas including socioeconomic conditions, open space, transportation, air quality, greenhouse gas emissions, noise, public health, neighborhood character, and construction, thereby requiring the preparation of a Targeted EIS.

Figure 1: Regional Location Map



Figure 2: Project Area Map



2. Project Description and Proposed Actions

Proposed Actions

To facilitate the proposed three buildings on Projected Development Site 1 (the Applicant's site), the Applicant seeks a zoning map amendment, zoning text amendments, and a CPC special permit. Specially, the Applicant proposes the following discretionary land use actions (the "Proposed Actions"):

1. A zoning map amendment to:
   - change an area bounded by Nicholas Street, Richmond Terrace, Stuyvesant Place, Hamilton Avenue and a line 185 feet from and parallel to Richmond Terrace and Stuyvesant Place between Hamilton Avenue and Nicholas Street from an R6 district with a C2-2 commercial overlay at a depth 100 feet located within the Special Hillsides Preservation District to an R7-3 district with a C2-4 commercial overlay at a depth of 185 feet within the Special St. George District; and
   - change an area bounded by Richmond Terrace, Hamilton Avenue and Stuyvesant Place from an R6 district with a C2-2 commercial overlay to an R6 district with a C2-4 commercial overlay within the SSGD.
2. A series of zoning text amendments to the New York City Zoning Resolution (ZR), Article II including to:
   - ZR Section 21-15 to allow an R7-3 district to be mapped in the Special St. George District; and
   - ZR Section 23-011(c) to allow optional quality housing regulations to apply to the Special St. George District.
3. A series of zoning text amendments to ZR Article XII, Chapter 8 (Special St. George District) to:
   - ZR Section 128-00 (General Purposes) to include an additional goal to ~~promote housing including affordable housing with the Special St. George District~~ foster economic diversity by supporting a broad range of housing including affordable housing within the SSGD.
   - ~~ZR Section 128-02 (General Provisions) to clarify that the Quality Housing Program option is inapplicable in C4-2 districts to maintain current regulations within majority of the Special District. However, floor area exemptions associated with the Quality Housing Program would be permitted.~~
   - ZR Section 128-03 (District Plans and Maps) to include the Project Area within the Upland Subdistrict ~~and potentially designate the western side of the Block 12, Lot as a commercial street to complement the Proposed Project and open space directly to the west, and to limit curb cuts along Stuyvesant Place~~.
   - ZR Section 128-21 (Maximum Floor Area Ratio) to establish the maximum floor area ratio of 6.0 within R7-3 Districts under the MIH program.
   - ZR Section 128-22 (Maximum Lot Coverage) to establish lot coverage of 70 percent for interior lots and 100 percent for corner lots for residential buildings in R7-3 districts.

- ZR Section 128-30 (Height and Setback Regulations) to ~~make the Special St. George District height and setback regulations inapplicable to the R6 and R7-3 districts. R6 districts would be regulated by the underlying district. R7-3 districts would be regulated by proposed Section 128-36 (Height and Setback Regulations in R7-3 Districts)~~ clarify that R7-3 is subject to regulations under this Section.
- ZR Section 128-31 (Street Wall Location) to clarify that street wall location requirements are inapplicable in the R7-3 district.
- ZR Section 128-33 (Maximum Base Height) to establish a maximum street wall height of 75 feet in an R7-3 district.
- ZR Section 128-34 (Maximum Building Height) to establish a maximum building height of 185 feet or 18 stories within an R7-3 district.
- ~~Proposed ZR Section 128-36 (Height an Setback Regulations in R7-3 Districts) to establish requirement setbacks of a minimum of 10 feet from a wide street and 15 feet from a narrow street above a maximum base height and 75 feet, and a maximum building height of 185 feet or 18 stories for R7-3 districts. Rooftop regulations of ZR Section 128-31 would be applicable in R7-3 Districts.~~
- ZR Section 128-51 (Required Off-street Parking and Loading) to make the underlying R7-3 and R6 parking and loading regulations applicable to such districts within the Special St. George District. R7-3 regulations would be governed by R7-2 district regulations.
- ZR Section 128-60 (Special Approvals) to create a new special permit (ZR 128-62) to allow bulk and mandatory improvements modifications for R7-3 districts within the Upland Subdistrict.
- Proposed ZR Section 128-62 (Special Permit for ~~Developments~~ Buildings in R7-3 Districts within the Upland Subdistrict) to facilitate the Proposed Project and allow modification to bulk and mandatory improvements regulations.

4. A zoning text amendment to Appendix F (Inclusionary Housing Designated Areas and Mandatory Inclusionary Housing Areas) to establish the Project Area as a Mandatory Inclusionary Housing (MIH) area. At this time, the Applicant intends to propose MIH Option 1 – which would require a minimum of 25% of residential units be set aside for households earning a weighted average of 60% the area median income (AMI) – and Option 2, which would require a minimum of 30% of residential units be permanently affordable for households at a weighted average of 80% of the AMI;
5. A CPC Special Permit pursuant to proposed ZR 128-62, which would permit modification of bulk regulations (except FAR) and mandatory improvements in R7-3 districts within the Upland Subdistrict. The special permit is only proposed for Projected Development Site 1, the Applicant-owned development site.

The Proposed Actions are classified as Unlisted, as defined under 6 NYCRR 617.4 and NYC Executive Order 91 of 1977, as amended, and are subject to environmental review in accordance with City Environmental Quality Review (CEQR) guidelines.

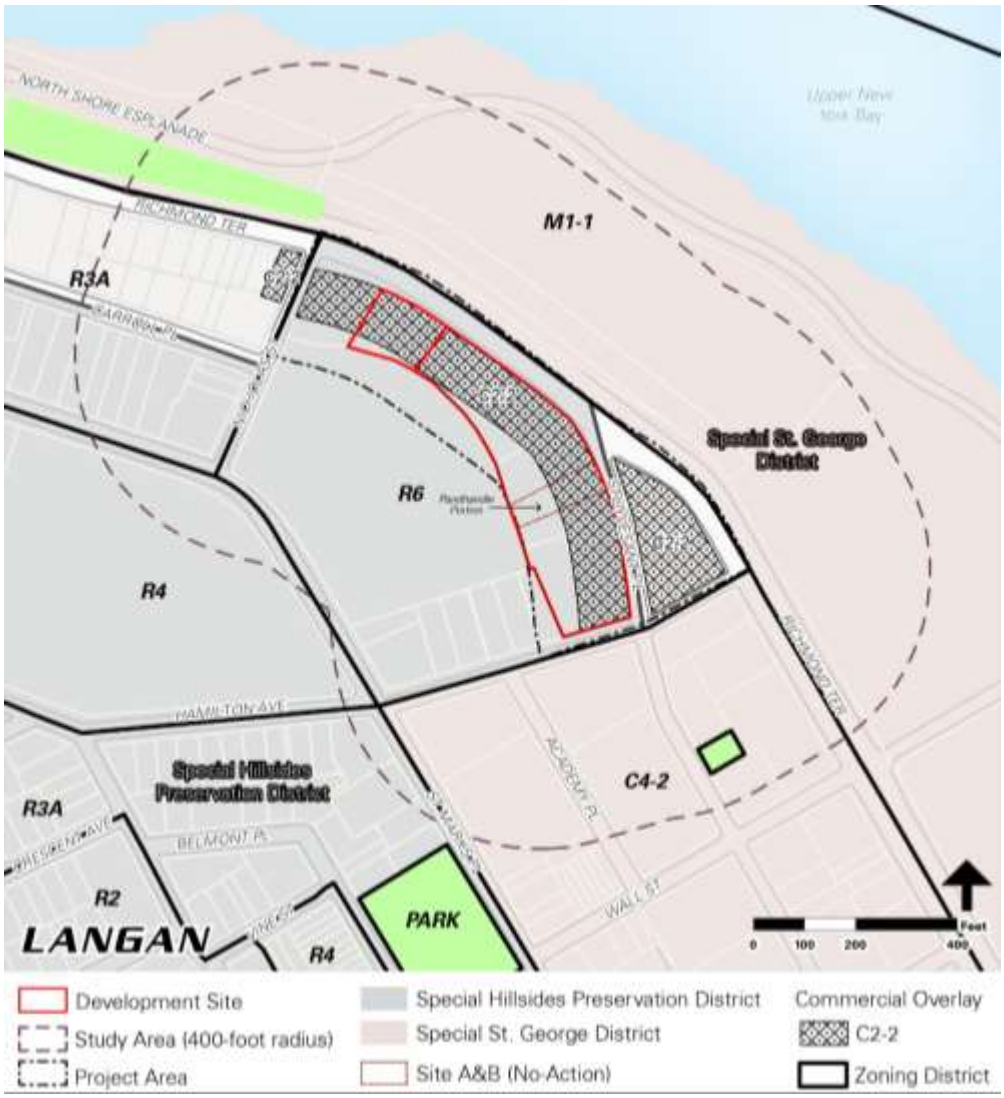
Project Area

The "Project Area" is bound by Richmond Terrace to the north and east, Hamilton Avenue to the south, a distance of 185 feet west of Stuyvesant Place and Richmond Terrace to the

south and west, and Nicholas Street to the west. The Project Area contains Block 12, Lot 1, Block 13 Lots 60, 68, 71, 73, 82, 92, and 100, and portions of Block 13 Lots 8, 116, and 119.

The Block 13 portion of the Project Area is in the Special Hillsides Preservation District, and the Block 12 portion is outside any special purpose districts. An R6 district is mapped across the Project Area with a C2-2 commercial overlay district within 100 feet of Richmond Terrace and Stuyvesant Place. Block 12, Lot 1 is also zoned R6 with a C2-2 overlay. The Special St. George District is mapped across Hamilton Avenue and Richmond Terrace from the Project Area. The Project Area includes two projected development sites. The existing zoning is shown in Figure 3.

Figure 3: Existing Zoning Map



Proposed Development

The Applicant proposes to develop three quality housing buildings (the "Proposed Development") across Projected Development Site 1 (Block 13, Lots 82, 92, 100, and the

portion of Lot 8 within 185 feet of Stuyvesant Place). The Proposed Development would have 750 residential units, at least 30 percent of which would be permanently affordable (225 affordable units). Each building would contain retail uses below the second floor. Floor area by use is shown in Table 1.

Table 1: Proposed Development - Floor Area by Use

	GSF by Use				Program		
Building	**Residential**	**Retail**	**Parking**	**Total**	**Bldg Height (ft)***	**DU**	**Parking Spaces**
Bldg 1	311,291	9,697	66,349	387,337	293	327	
Bldg 2	235,327	1,715	0	237,042	265	295	341
Bldg 3	133,997	7,468	35,750	177,215	152	128	
TOTAL	**680,615**	**18,880**	**102,099**	**801,594**	**Up to 291**	**750**	**341**

* The building height includes 20-foot bulkheads on each building.

Development Sites

The Reasonable Worst Case Development Scenario (RWCDS) for this project established that there would be two "projected development sites" as a result of the Proposed Actions. Projected Development Site 1 is owned by the Applicant and comprises two zoning lots under ownership of the Applicant: Site A and Site B. Site A comprises Block 13, Lot 100, and has 39,771 square feet (sf) of lot area. It is a vacant corner lot and has street frontage along Stuyvesant Place to the east and along Hamilton Avenue to the south. Site B comprises Block 13, Lots 82 and 92, and has 49,530 sf of lot area. It is an irregular interior lot with street frontage only along Richmond Terrace. Site B is vacant except for scattered vegetation and remnants of building foundations on Lot 82.

Sites A and B are bisected by Block 13, Lot 8 (the "Castleton lot"), a 209,088-sf irregular lot with frontage along Stuyvesant Place, St. Marks Place, and Nicholas Street. The Castleton lot contains the Castleton Park Apartments, which comprise two multi-family residential height factor buildings, an accessory parking garage, and private recreation areas. The portion of the Castleton lot nearest Stuyvesant Place is a panhandle shape that separates the Site A and Site B portions of Projected Development Site 1. Independent of the Proposed Actions, the Applicant will acquire the panhandle portion of the Castleton lot, the area within 185 feet of Stuyvesant Place (9,428 sf). The acquisition would also allow Projected Development Site 1 to be one zoning lot in the With-Action Condition (but not the No-Action Condition because the open space is required to meet the height factor requirements of R6 on the Castleton lot).

Street widening is mapped along the Stuyvesant Place frontage of Site A and the approximately 50-foot frontage of the Castleton Lot along Stuyvesant Place. The area mapped for street widening includes 185.2 sf of the Castleton Lot, 409.7 sf of Lot 100, 314.5 sf of Lot 103, and 750.25 sf of Lot 104.

Projected Development Site 2 is to the west of Site B and comprises Block 13, Lots 68, 71, 73. Lot 68 is vacant, and Lots 71 and 73 are each listed for sale and are each developed with one two-family house. Projected Development Site 2 is not under control of the Applicant.

The projected development sites generally slope up from lower elevations along Richmond Terrace frontage to higher elevations to the west. The entirety of both projected development sites are in the Special Hillsides Preservation District (see Figure 3).

Other Lots

Lot 60 is developed with a 58,795 gsf multi-family residential building, "The View," which has 40 dwelling units (DUs) and ground floor retail. Along Hamilton Avenue, Lots 116 and 119 are partially within the Project Area; Lot 116 is vacant and Lot 119 contains a two-family detached house.

Block 12 Lot 1 contains two commercial buildings totaling 17,500 gsf and accessory parking areas that are accessed from Richmond Terrace and Stuyvesant Place. The eastern building contains office space, while the western building is used as an eating and drinking establishment. The site slopes from its lower elevations along Richmond Terrace to its highest elevations along Stuyvesant Place. The change in elevation allows a rooftop parking area to be accessed from Stuyvesant Place.

3. Purpose and Need

The Project Area serves as the northern gateway to St. George along Richmond Terrace and has the potential to serve as a northern extension of Downtown Staten Island. Currently, Sites A and B are within the Special Hillsides Preservation District, which limits the development potential of these sites. As a result, Sites A and B have remained fallow for many years. At the same time, the natural slope – a significant feature in the Special Hillsides Preservation District – within the Project Area and on Block 13 has been compromised by development such as the Castleton Park Apartments to the west. Other previous developments that have been demolished within the Project Area have also modified the hillside. The Project Area within the Special Hillsides Preservation District is atypical:

- The Special Hillsides Preservations District is predominately comprised of lower density (R1-R4) residential districts, districts that permit one- and two-family residences. The Project Area is in an R6 district, a medium density district that permits taller multi-family residential buildings;
- The hillside within the Project Area has been compromised by historical and surrounding development including the parking garage of the Castleton Park Apartments, and previous development that was demolished in the late 1970s; foundations still remain on Site B;
- The Project Area is at the very edge of the Special Hillsides Preservation District; and
- The Project Area is across Richmond Terrace and Hamilton Avenue from the Special St. George District, a special district that encourages denser urban development and is largely within a C4-2 commercial zoning district (which has an R6 equivalent).

Development under the Proposed Actions would respond to the site's location as a gateway to Downtown Staten Island and St. George, and would capitalize on the Project Area's proximity to mass transportation. Similar to other recent development along Richmond Terrace and Bay Street - such as the Empire Outlets and Lighthouse Point – the Proposed Project would provide housing, including affordable options, active retail, and privately owned, publicly accessible open space. The proposed zoning map and text amendments – along with the special permit that would be created through the proposed text amendments – would allow the building location and massing to respond to the surrounding urban context and support a superior site plan and better urban design. Overall, the Proposed Actions are consistent with public policies such as OneNYC, Housing

New York, and North Shore 2030 and would accomplish multiple land use goals for the neighborhood, borough and the City.

4. Analysis Framework

The 2014 *CEQR Technical Manual* will serve as guidance on the methodologies and impact criteria to evaluate the potential environmental effects of the Proposed Actions.

Analysis (Build) Year

The analysis year established for this project is 2025, the year when new development generated by the Proposed Actions would be complete and fully occupied. The analysis year assumes the Proposed Actions would be adopted in 2021, and construction would commence soon after and last approximately three years.

Reasonable Worst Case Development Scenario (RWCDS)

Identification of Development Sites

In addition to the Applicant's site (Projected Development Site 1), there would be one projected development site that is not Applicant-controlled, Projected Development Site 2. Because the Proposed Actions would significantly increase the permissible FAR with the mandatory provision of affordable housing on these sites, and remove provisions of the Special Hillsides Preservation District, the Proposed Actions could facilitate new development on Projected Development Site 2. The RWCDS memorandum for this project assumed Projected Development Site 2 would be developed as a mixed use building with an FAR of 6.0 (the maximum FAR that would be permitted) in the With-Action Condition). Being a site not controlled by the Applicant, the With-Action Condition established in the RWCDS for Projected Development Site 2 does not reflect the Applicant's proposed plans.

No-Action Condition

In the No-Action Condition, the Site A portion of Projected Development Site 1 would remain vacant because of the provisions of the Special Hillsides Preservation District that protect steep slope and steep slope buffers make development of this site difficult to develop as-of-right. The street widening line is only on Site A. Because there would be no development on Site A in the No-Action Condition, no street widening would occur and Stuyvesant Place would remain as existing conditions.

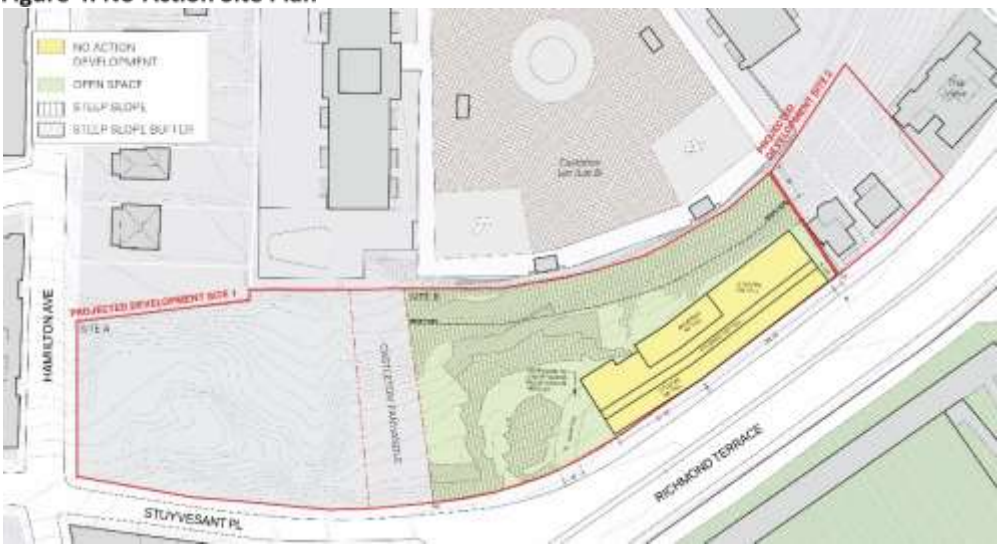
The Site B portion of Projected Development Site 1 would be developed with a 143,030 gsf building comprising 167 market rate DU (128,169 gsf), 8,240 gsf of retail space, and 12,125 gsf of accessory parking (29 spaces). Of the 131 required parking spaces, 103 would be provided off-site and within 600 feet of Site B. The building would be developed pursuant to R6 height factor regulations. The building base would rise five floors to a height of 60 feet along the Richmond Terrace frontage before a 15-foot setback. The building would then rise six stories before a second setback at the 12th floor. The building would have a roof height of 136 feet. Including a 30-foot-tall bulkhead, the building would be 166 feet tall.

Independent of the Proposed Actions, the Applicant would acquire the Castleton lot's panhandle portion (the area within 185 feet of Stuyvesant Place). This panhandle would not be incorporated into Sites A and B because it is needed for the Castleton lot's required

open space ratio, and a non-compliance would occur if subdivided from this zoning lot under existing zoning.

At Projected Development Site 2, the two existing two-family houses would remain as existing conditions. Lot 68 would remain vacant. The No-Action site plan is shown in Figure 4.

Figure 4: No-Action Site Plan



For illustrative purposes only.

Source: FXCollaborative

With-Action Condition

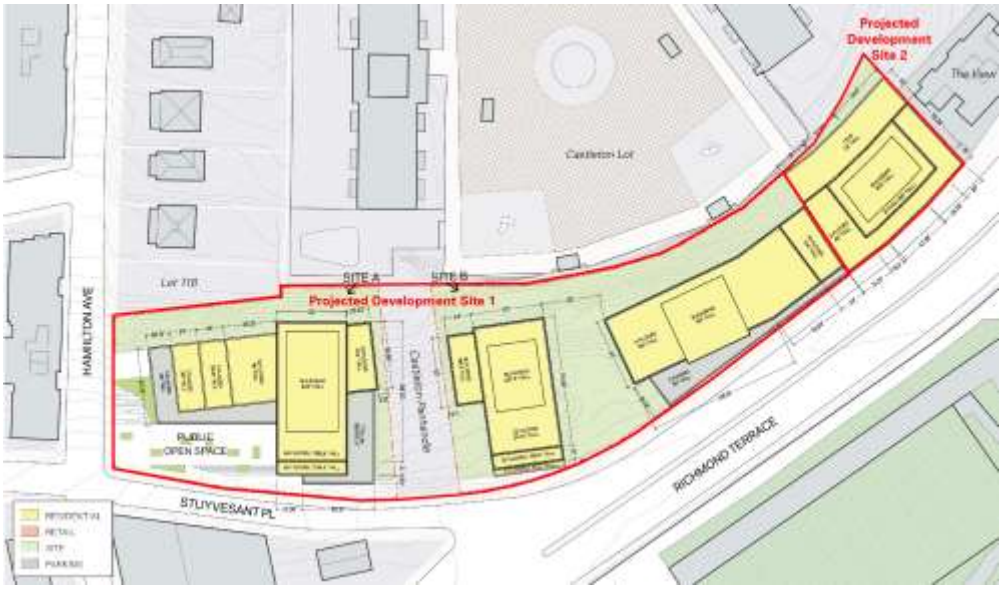
The RWCDS With-Action Condition differs from the Proposed Development. In the With-Action Condition, the Proposed Actions would be adopted, and the Applicant would acquire the panhandle portion of the Castleton Lot (like the No-Action Condition) and allow Projected Development Site 1 to be one zoning lot. The RWCDS for this project established that the Proposed Actions would facilitate development on two projected development sites.

The RWCDS differs from the Proposed Development because the RWCDS established that Projected Development Site 1 would be developed with 797 DUs (687,794 gsf, or a "DU factor" of 863 residential gsf per DU) and up to 23,145 gsf of retail, which is 47 DUs and 4,265 gsf of retail greater than the Proposed Development. The With-Action building envelope also differs from the Proposed Development. In the RWCDS, the roof height of each building would be the same as the Proposed Development, but the bulkhead of each building on Projected Development Site 1 would be 5 feet taller. The street widening line would not affect the floor area of the building, which would be determined by the property line, per Buildings Bulletin 2014-011 issued by the NYC Department of Buildings.[1] The buildings would be sited outside the street widening line, and the depth of the required setbacks would be measured from the mapped street line. The proposed special permit, which requests waivers to the underlying height and setback regulations, would address setback requirements based on the street widening line.

[1] http://www.nyc.gov/html/dob/downloads/bldgs_bulletins/bb_2014-001.pdf

At this time, the Applicant intends to propose MIH Option 2, which would require a minimum of 30% of residential units be permanently affordable at a weighted average of 80% of the AMI. The With-Action site plan is shown in Figure 5.

Figure 5: With-Action Site Plan



Projected Development Site 1

Building 1 would be a 26-story, 396,016 gsf building comprising 325,310 gsf of residential space (348 DU, or a DU factor of 935 residential sf per DU), 11,888 gsf of retail space, and 58,818 gsf of accessory parking (assuming 200 sf per parking space, up to 294 spaces). The building would have a three-story podium with a base height of 36 feet. The tower portion would rise to a roof height of 273 feet. Including a 25-foot bulkhead, Building 1 would rise to a height of 298 feet. The massing would incorporate a series of setbacks to "step down" to Hamilton Avenue from taller components further west along Stuyvesant Place. At the ground level, a 7,790 sf privately owned, publicly accessible open space would be developed adjacent to the intersection between Stuyvesant Place and Hamilton Avenue. Building 1 would contain 105 affordable units, of which 70 would be reserved for households earning up to 80% of the AMI.

Building 2 would be sited 60 feet to the north of Building 1, and would be a 25-story, 237,559 gsf building comprising 2,102 gsf of retail space and 235,457 gsf of residential space (313 DUs, or a DU factor of 759 residential gsf per DU). There would be no accessory parking within Building 2. The building would have a podium height of 75 feet before a 12.5-foot setback along the Richmond Terrace frontage. The building would then rise to a height of 200 feet to the 20th floor before a 7-foot setback from Richmond Terrace. Above this setback and at a height of 200 feet, the building would rise to a height of 245 feet. Including a 25-foot bulkhead, Building 2 would rise to a height of up to 270 feet. Of the 313 DU in Building 2, 94 would be affordable units, of which 63 would be reserved for households earning up to 80% of the AMI.

Building 3 would be sited on the northwestern portion of Projected Development Site 1. Building 3 would be an 11-story, 173,646 gsf building comprising 9,155 gsf of retail space, 127,027 gsf of residential space (136 DUs, or a DU factor of 935 residential gsf per DU),

and 37,464 gsf of accessory parking (assuming 200 sf per space, up to 187 spaces). At the Richmond Terrace frontage, the building would rise to a podium height of 75 feet before a 14-foot setback. The building would then rise to a roof height of 132 feet. Including a 25-foot bulkhead, Building 3 would rise to a height of 157 feet. Of the 136 DU in Building 3, 41 would be permanently affordable units, of which 27 would be reserved for households earning up to 80% of the AMI.

Projected Development Site 2

Projected Development Site 2 is not controlled by the Applicant. Lots 68 and 71 are listed for sale, and Lot 73 is owned by a known developer. The Proposed Actions have the potential to facilitate development on Projected Development Site 2 by introducing an additional 3.0 permissible floor area ratio (FAR) and removing the site from the Special Hillsides Preservation District. To present a conservative analysis, the With-Action Condition assumes Projected Development Site 2 would be developed with the maximum permissible FAR of 6.0, and to the maximum height permitted by the Proposed Actions.

The RWCDS established that the building would have a 65-foot-tall podium along the entirety of the Richmond Terrace frontage. Above the podium, the tower component would be set back from the side lot lines and 15 feet from Richmond Terrace before rising to the 18th floor and to a roof height of 185 feet. The building would be 205 feet tall including a 20-foot-tall bulkhead. The 117,848 gsf building would contain 4,929 gsf of retail, 100,019 gsf of residential space (100 DUs, or a DU factor of 1,000 residential gsf per DU), and 12,900 sf of accessory parking (43 spaces). Of the 100 DUs, 30 would be permanently affordable units, of which 20 would be reserved for households earning up to 80 percent the AMI.

Increment

Compared to the No-Action Condition, the With-Action Condition would result in larger building envelopes and an increment of 776,535 gsf. The increment established in the RWCDS is shown in Table 2.

Table 2: Project Increment by Use

Condition	DU	Parking Spaces	Residential gsf	Retail gsf	Parking gsf	Total gsf
No-Action	171	58	128,169	8,240	12,125	148,534
With-Action	897	409	787,813	28,074	109,182	925,069
Increment	**726**	**351**	**659,644**	**19,834**	**97,057**	**776,535**

City Environmental Quality Review

All City discretionary land use approvals require environmental review under State Environmental Quality Review Act (SEQRA) and CEQR procedures. DCP is the CEQR lead agency for the Proposed Actions.

The Proposed Actions are considered Unlisted. As detailed in "Part II, Technical Analysis" of the EAS form, the Proposed Actions would not have the potential to result in significant adverse environmental impacts in the following areas: land use, zoning, and public policy; community facilities and services; shadows; historic and cultural resources; urban design and visual resources; natural resources; hazardous materials; water and sewer infrastructure; solid waste and sanitation services; and energy.

As described below, through the incorporation of (E) Designations, the EAS concluded the Proposed Actions would not result in significant adverse impacts related to hazardous materials. The (E) Designation would require specific protocols to be undertaken prior to and during construction of the project. With the implementation of these measures, no significant adverse impacts related to hazardous materials would occur.

The EAS determined that the Proposed Actions may result in significant adverse impacts in the areas of socioeconomic conditions, open space, transportation, air quality, greenhouse gas emissions, noise, public health, neighborhood character, and construction. Therefore, a detailed assessment of likely effects in those areas will be prepared in a Targeted EIS (see Section 7, "Scope of Work for the EIS").

Scoping

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Actions. At the same time, the process allows other agencies and the public a voice in framing the scope of the EIS. This Final Scope sets forth the analyses and methodologies that will be used to prepare ~~proposed for~~ the EIS. During the scoping period, those interested in reviewing the Draft Scope ~~may~~ were able to do so and provide comments in writing to the lead agency or at a public scoping meeting ~~to be~~ that was held virtually~~. A public scoping meeting has been scheduled for~~ at 2 PM, on Thursday, November 19th, 2020. In support of the City's efforts to contain the spread of COVID-19, DCP ~~will hold~~ held the public scoping meeting remotely through video conferencing. The meeting ~~will be~~ was live streamed and accessible from New York City's online remote meeting portal—NYC Engage: https://www1.nyc.gov/site/nycengage/events.

Comments received during the Draft Scope's public hearing, and written comments received up ~~to 10 days after the hearing~~ November 30th, 2020 ~~will be~~ have been considered and incorporated as appropriate into ~~a~~ this Final Scope ~~of work~~. ~~The comment period will close at 6PM on November 30th, 2020.~~ A summary of comments received during the public comment period and responses to those comments are provided in Appendix A. The Final Scope ~~of work~~ will be used as a framework ~~for preparing~~ to prepare the Draft EIS (DEIS) for the Proposed Actions.

5. Proposed Scope of Work for the EIS

The Targeted EIS will be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (Article 8 of the New York State Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617.9, New York City Executive Order No. 91 of 1977, as amended, and the Rules of Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York. The EIS will follow the guidance of the 2014 *CEQR Technical Manual*.

The Targeted EIS will contain:

- A description of the Proposed Project and its environmental setting;
- A statement of the potential environmental impacts of the Proposed Actions, including its short- and long-term effects and typical associated environmental effects;
- An identification of any potential significant adverse impacts that cannot be avoided if the Proposed Actions are approved;

- A discussion of reasonable alternatives to the Proposed Project;
- A description of irreversible and irretrievable commitments of resources that would be involved in the Proposed Project should it be implemented; and
- A description of mitigation proposed to minimize any significant adverse impacts.

The specific CEQR technical areas and tasks to be included in the EIS are described below.

Task 1: Project Description

The first chapter of the EIS introduces the reader to the Proposed Actions and sets the context in which to assess impacts. The chapter will contain the background and purpose and need for the Proposed Project; the Proposed Actions; a detailed description of the Proposed Project and Proposed Actions; and a discussion of the roles of involved public agencies, procedures to be followed, and the role of the EIS in the CEQR process. This chapter is basic to understanding the Proposed Actions and its impacts, and gives the public and decision-makers a context from which to evaluate the Proposed Project. The Project Description will provide a brief history of zoning changes applicable to the Rezoning Area along with a qualitative description of the regulations applicable in the Special Hillsides Preservation District.

Task 2: Socioeconomic Conditions

As defined in the *CEQR Technical Manual,* the socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area, regardless of whether the changes result in other environmental impacts under CEQR. A socioeconomic assessment considers whether a proposed project could result in significant adverse impacts on the socioeconomic character of an area due to the direct displacement of the residential population on a project site, indirect displacement of the residential population within a study area, direct displacement of existing businesses on a project site, indirect displacement of existing businesses within a study area, or adverse effects on specific industries.

The Proposed Actions would not directly displace more than 500 residents or more than 100 employees, and therefore assessment is not anticipated in the areas of residential or business direct displacement. The Proposed Actions would not result in 200,000 square feet or more of commercial space, and therefore the Proposed Actions are not anticipated to warrant an assessment in indirect business displacement. Additionally, the Proposed Actions are not anticipated to adversely affect conditions in a specific industry. Because the Proposed Actions would introduce more than 200 residential units, a socioeconomics conditions assessment focusing on indirect residential displacement will be presented in the Targeted EIS.

Indirect Residential Displacement

Indirect displacement is defined in the *CEQR Technical Manual* as "the involuntary displacement of residents, businesses, or employees that results from a change in socioeconomic conditions in a particular study area as a result of the proposed project." The objective of indirect residential displacement assessment is to determine whether the Proposed Actions may either introduce or accelerate a trend of changing socioeconomic

conditions that may potentially displace a vulnerable population, most notably renters living in privately-held units unprotected by rent control, rent stabilization, or other government regulations. The Study Area will include all 2010 Census Tracts where 50 percent of more of the tract's area is within one half-mile of the Project Area, as shown in Figure 6.

Figure 6: Socioeconomics Conditions Study Area



The potential for indirect displacement depends not only on the characteristics of the imposed project but on the characteristics of a study area. These characteristics include:

- Total population by Census Tract, for a study area, the borough, and New York City. In addition, demographic data from the larger Public Use Microdata Area (PUMA) 3903, which encompasses the study area, will also be considered.
- Housing values and rent. This assessment will utilize data received from real estate brokers active in the study area, in addition to review of online market data for current and recent rental listings in the study area and surrounding environs. Real estate brokers will also be asked about local activity related to conversion of rental units to condominium or cooperative ownership units.

- Estimates of the number of housing units not subject to rent control. This assessment will utilize data from the U.S. Census related to the total number of rental units in the study area and data from the Bay Street Corridor Rezoning and Related Actions Final Environmental Impact Statement (FEIS) to identify existing and protected rental units. Based on real estate market data, this assessment will also project the number of total rental units and protected rental units in future No-Action and With-Action conditions.
- Household income. Median household income and percentage of population living below the poverty line will be identified based on data from the U.S. Census.

After identifying these characteristics, the socioeconomic analysis will comprise four general components:

1. Determine if the Proposed Actions would add new population with higher average incomes than existing and projected average incomes in the study area;
2. Determine if the increase in population due to the Proposed Actions is large enough, relative to the size of the population expected to live in the study area without the Proposed Actions, to affect the local residential real estate market for rental properties. If the population increase is five percent or greater, then further analysis is needed;
3. Consider whether the study area has experienced a readily observable trend toward increasing rents and the likely effect of the Proposed Actions on such trends; and
4. Determine whether the low-income renter population in the Study Area (for this assessment defined as households with incomes at 80 percent or less of the New York City Area Median Income (AMI)) exceeds the supply of protected rental units in the study area and, if so, quantify that population that is vulnerable to displacement due to increasing rents.

According to the *CEQR Technical Manual*, if the population that is vulnerable to displacement due to increasing rents exceeds five percent of a study area, a significant adverse impact may occur. If the project would result in significant adverse socioeconomic impacts, the EIS would identify measures to avoid, minimize, or mitigate such adverse impacts.

Task 3: Open Space

According to the *CEQR Technical Manual*, an assessment of potential effects on open space resources are typically required if a proposed project would have the potential to result in either direct or indirect effects on open spaces. Direct effects may occur when the proposed project would encroach on, or cause a loss of, open space. Indirect effects may occur when the population generated by the proposed project overtaxes the capacity of existing open spaces so that their service to the future population of the affected area would be substantially or noticeably diminished.

The Proposed Actions would introduce a new publicly accessible open space on Projected Development Site 1, the Applicant's site. Because the Proposed Actions would result in a decrease in residential open space ratio (OSR) beyond the five percent threshold described in the *CEQR Technical Manual*, an analysis of the effects of the Proposed Actions on open space will be included in the EIS.

This task involves the following and will be documented in the EIS chapter:

- Delineate a study area comprising the 2010 census tracts with 50 percent or more of their area within one half-mile of the Project Area. Figure 7 shows 2010 Census Tracts 3, 7, 9, and 11 have more than 50 percent of their area within one half-mile of the Rezoning Area. Because Lyons Pool is adjacent to Tract 3 and is a unique open space resource containing a pool that would be expected to draw users from the Rezoning Area and beyond, Lyons Pool would be included in the open space Study Area.

Figure 7: Open Space Resource Map



- Identify the open space resources in the study area. These include, but are not necessarily limited to NYC Department of Parks and Recreation (NYC Parks)-operated

parks, Privately Owned Public Spaces (POPS), and publicly accessible open areas on private properties.

- Determine the existing, No-Action, and With-Action populations in the open space study area.
- Calculate the OSR based on the acreage of open space resources and population anticipated in each condition.
- Describe the study area population by age group as reported in the 2013-2017 American Community Survey.
- Assess the availability and quality of open space programming of open space for age groups.

If the project would result in a significant adverse open space impact (i.e., would result in conflicts in open space use or result in a user group being underserved), the EIS would identify measures to avoid, minimize, or mitigate adverse impacts to open space.

Task 4: Hazardous Materials

The potential for significant impacts from hazardous materials occurs when hazardous materials exist on a site and an action would increase pathways to their exposure to humans and the environment, or an action would introduce new activities or processes using hazardous materials. Potential routes of exposure to hazardous materials can include direct contact, such as contact between contaminated soil and skin (dermal contact), breathing of VOCs or chemicals associated with suspended soil particles (inhalation), or swallowing soil or water (ingestion)

The hazardous materials section of the Targeted EIS will examine the potential for significant hazardous materials impacts from the Proposed Actions, as defined in the *CEQR Technical Manual*. The EIS will include a discussion of the development site's history and current environmental conditions. The EIS will also summarize the findings of the completed Phase I ESA(s) conducted for the Development Site and will include any necessary recommendations for additional testing or other activities that would be required either prior to or during construction and/or operation of the project. The appropriate remediation measures specific to the future uses of the site, including any New York City Department of Environmental Protection (DEP) recommendations, will be provided in the EIS. If necessary, measures to avoid or reduce potential significant adverse impacts will be identified and discussed in the EIS.

Projected Development Site 2

Projected Development Site 2 is not under control of the applicant. To preclude the potential for significant adverse impacts related to hazardous materials, an (E) Designation would be placed on the NYC Zoning Map as part of the Proposed Actions to ensure requirements pertaining to hazardous materials would be addressed during any future redevelopment involving soil disturbance of this site. An (E) Designation imposes pre- and post-construction requirements overseen by the New York City Office of Environmental Remediation (OER).

Task 5: Transportation

The objective of a transportation analysis is to determine whether a proposed action may have a potentially significant adverse impact on traffic operations and mobility, public transportation facilities and services; pedestrian elements and flow; safety of roadway users (pedestrians, bicyclists and vehicles); and parking. The *CEQR Technical Manual* describes a two-tier screening process to determine if quantified analyses of transportation conditions are warranted. The preliminary assessment begins with a trip generation analysis (Level 1) to estimate person and vehicle trips that would result from the Proposed Actions.

According to the *CEQR Technical Manual*, a project that is expected to result in fewer than 50 peak hour vehicle trips and fewer than 200 peak hour transit or pedestrian trips does not warrant further quantified analyses. When these thresholds are exceeded, detailed trip assignments (Level 2) are performed to estimate the incremental trips at specific transportation elements and to identify potential locations for further analyses. If the trip assignments show that the Proposed Actions could generate 50 or more peak hour vehicle trips at an intersection, 200 or more peak hour subway trips at a station, 50 or more peak hour bus trips in one direction along a bus route, or 200 or more peak hour pedestrian trips traversing a pedestrian element, then further quantified analyses of transportation conditions may be warranted to assess transportation conditions in the Study Area. Based on a preliminary travel demand assessment, the Proposed Project's residential and retail trip generation would exceed CEQR thresholds during the weekday AM, midday, PM, and Saturday midday peak hours for detailed transportation analyses. Therefore, quantified analyses will be required to assess the potential impacts of project-generated trips on key traffic intersections, pedestrian locations, nearby transit services, the area's parking resources, and vehicular and pedestrian safety. If the project would result in a significant adverse impact to transportation, the EIS would identify measures to avoid, minimize, or mitigate such adverse impacts.

Specific tasks to be undertaken as part of the Transportation assessment are as follows:

Travel Demand Screening Assessment

The transportation analysis will use the RWCDS to assess potential transportation impacts of the Proposed Actions. Travel demand estimates for the Proposed Actions will be prepared based on trip generation, modal split, and vehicle occupancy assumptions from standard sources such as the *CEQR Technical Manual*, U.S. Census data, approved studies, and other references. The trip estimates (Level-1 screening assessment) will be summarized by peak hour, mode of travel, and person versus vehicle trips. The trip estimates will also identify the number of peak hour person trips made by transit and the numbers of pedestrian trips traversing the area's sidewalks, corner reservoirs, and crosswalks. The results of these estimates will be summarized in a Travel Demand Factors (TDF) memorandum for review and concurrence by DCP and New York City Department of Transportation (DOT). In addition to trip estimates, detailed vehicle, pedestrian and transit trip assignments will be prepared to validate the intersections and pedestrian/transit elements selected for undertaking quantified analysis and will be summarized in the TDF Memorandum.

Traffic

A traffic study area will be selected for detailed analysis. The traffic study area will include intersections closest to the project site as well as key intersections at the portals which would experience major project-generated traffic volumes.

Data Collection

Given the current New York City Department of Transportation (DOT) moratorium on traffic data collection and COVID-19 restrictions, it is not possible to perform traffic and pedestrian counts at this time and it is unlikely counts can be obtained in the coming months. Existing data will be obtained from a variety of sources that may also include new data collection, in consultation with the Lead Agency and DOT. The data will be normalized to establish estimated current conditions. Information pertaining to street widths, traffic flow directions, lane markings, parking regulations, and bus stop locations at study area intersections will be inventoried and traffic control devices (including signal timings) in the study area will be recorded and verified with official signal timing data from DOT.

Existing Traffic Analysis

Balanced peak hour baseline traffic volume networks will be prepared to conduct capacity analysis of study area intersections. The capacity analysis will be conducted using the *2000 Highway Capacity Manual* (HCM) methodology with DOT's approved version of Highway Capacity Software (HCS).). The existing volume-to-capacity (v/c) ratios, delays, and levels of service (LOS) for the weekday AM, midday, and PM and Saturday midday peak hours will be calculated.

Future No-Action Condition Analysis

Future No-Action traffic volumes will be calculated in accordance with *CEQR Technical Manual* guidelines. This will be accomplished by incorporating the background growth to existing traffic volumes, and accounting for any incremental changes in traffic volumes resulting from future planned developments in the study area. Trip estimates for future projects will be determined using the approved set of travel demand factors and other appropriate references. In addition, geometric changes that could be implemented independent of the proposed project would be incorporated into the Future No-Action traffic analysis. The Future No-Action v/c ratios, delays, and LOS at the study area intersections will be calculated.

Future With-Action Condition Analysis

Traffic impact analysis for the Proposed Project will be conducted by adding project-generated trips onto the Future No-Action traffic network. Physical and operational changes resulting from the Proposed Project will also be incorporated into the analyses. The potential traffic impacts will be evaluated in accordance with *CEQR Technical Manual* criteria. If any significant adverse traffic impacts are identified, mitigation measures will be recommended to mitigate such impacts.

Parking

Parking surveys will be performed within a ¼-mile study area to record on-street and off-street parking supply and utilization. Parking accumulation estimates for the Proposed Actions will be developed to identify peak parking time periods and 24-hour in/out activities for any proposed on-site parking facilities. Project-generated parking demand

projections will be compared to the available supply in the study area to determine if project-generated demand could result in a potential for parking shortfall. The effects of on-street parking spaces displacement resulting from traffic mitigation measures will also be addressed.

Transit

The Project Area is served by three different transit modes at the nearby St. George Terminal: the NYCDOT Staten Island Ferry to Manhattan, the MTA Staten Island Railway to Tottenville, and numerous MTA NYCT local Staten Island bus routes. Based on the availability of several mass transit options in the study area, transit trip levels are not anticipated to exceed the CEQR thresholds for detailed subway, bus, railroad, or ferry analyses. However, a qualitative description of available transit options in the study area will be included in the transportation analyses and quantitative analyses will be prepared, if needed based on the guidance provided in the *CEQR Technical Manual*.

Pedestrians

Pedestrian analysis for the Proposed Project will be conducted pursuant to CEQR guidelines (including sidewalks, crosswalks and corner reservoirs), for the weekday AM, midday, and PM and Saturday midday peak periods. Project-generated pedestrian trips will be assigned to pedestrian facilities adjacent to the project site as well as along primary routes to and from the area's transit facilities (primarily the St. George Terminal). The pedestrian analysis will be conducted for the existing, Future No-Action and Future With-Action conditions. If needed, measures will be recommended to mitigate any potential significant adverse pedestrian impacts.

Vehicular and Pedestrian Safety

Accident data for the study area intersections and other nearby sensitive locations from the most recent three-year period will be obtained from the New York State Department of Transportation (NYSDOT). The data will be summarized by accident-type on a yearly basis to determine if any of the study area locations may be classified as a high pedestrian/bicycle accident location per *CEQR Technical Manual* criteria. If any high accident locations are identified, measures will be recommended to alleviate potential safety issues.

Task 6: Air Quality

According to *CEQR Technical Manual (2014)* guidelines, an air quality analysis is conducted to assess the effect of a proposed action on ambient air quality (i.e., the quality of the surrounding air), or effects on a proposed project because of ambient air quality. Air quality can be affected by mobile sources (such as pollutants produced by motor vehicles) and by stationary sources (such as pollutants produced by fixed facilities). If the project would result in significant adverse air quality impacts, the EIS would identify measures to avoid, minimize, or mitigate such adverse impacts.

Stationary Industrial and Large or Major Source Emissions

The Clean Air Tracking System (CATS) maintained by the NYC Department of Environmental Protection (DEP) will be reviewed to identify potential sources of emissions from manufacturing/industrial operations within 400 feet of the development sites. If any such sources are identified, the relevant air emissions permits will be obtained from the

NYCDEP and an industrial source air quality assessment will be conducted following the *CEQR Technical Manual* guidance. There are no large or major sources (as defined by the *CEQR Technical Manual*) within 1,000 feet of the development sites, and therefore the Targeted EIS is not expected to include modeling of emissions from large or major sources.

Stationary Source Emissions from HVAC Systems

Emissions from the HVAC systems of project-generated buildings may affect air quality levels at nearby existing or future land uses. The effects of these emissions would be a function of fuel type, boiler capacity and type, stack height and location, building dimension, and location relative to a nearby sensitive receptor sites. An HVAC screening would be completed for each building following the guidance provided in the *CEQR Technical Manual*, including for project-on-project effects and project-on-existing effects. If the screening cannot rule out the potential for significant adverse air quality impacts, detailed dispersion analysis of impacts of the HVAC emissions will be conducted using the EPA's AERSCREEN or AERMOD modeling software in accordance with CEQR guidance.

Mobile Source Emissions

The Proposed Actions are expected to generate traffic volumes that exceed the heavy duty vehicle-equivalent thresholds listed in Chapter 17, Section 210 of the *CEQR Technical Manual*, and a mobile source assessment will be conducted for particulate matter ($PM_{2.5}$ and PM_{10}) following the guidance established in the *CEQR Technical Manual*. Project-generated traffic is not expected to exceed the *CEQR Technical Manual* threshold of 170 incremental auto trips at any intersection that would warrant carbon monoxide (CO) assessment; therefore, the Targeted EIS is not expected to include an assessment of project-generated CO assessment from mobile sources. The Proposed Actions would facilitate two large enclosed parking facilities. The Targeted EIS will include a parking facility air quality assessment consistent with CEQR guidance.

Task 7: Greenhouse Gas (GHG) Emissions and Climate Change

As described in the *CEQR Technical Manual,* the GHG Emissions and Climate Change assessment consists of two steps, which include estimating the project's emissions and examining the project in terms of the qualitative goals for reducing GHG emissions**.** The operational and mobile source emissions generated by the Proposed Actions will be estimated using Table 15-1 of the *CEQR Technical Manual*. The EIS will then qualitatively assess the project in terms of the qualitative goals for reducing GHG emissions. Once the emissions are estimated, the project's consistency with the City's GHG reduction goal will be assessed following the guidance of the *CEQR Technical Manual*. If the project would result in a significant adverse GHG Emissions and Climate Change impact, the EIS would identify measures to avoid, minimize, or mitigate such adverse impact.

Task 8: Noise

The Noise assessment will analyze the potential noise effects associated with the Proposed Actions. The Proposed Actions would introduce new noise-sensitive receptors to the Project Area, consisting of residential, commercial, and accessory parking. According to the *CEQR Technical Manual*, the purpose of a CEQR noise assessment is to determine:

1. a proposed project's potential effects on sensitive noise receptors, including the effects on the level of noise inside residential, commercial, and institutional facilities (if applicable), and at open spaces; and
2. the effects of ambient noise levels on new sensitive uses introduced by a proposed project. If significant adverse impacts are identified, CEQR requires such impacts to be mitigated or avoided to the greatest extent practicable.

This noise analysis will establish the ambient noise levels and determine the level of building attenuation required to ensure that interior noise levels within the proposed project would satisfy applicable interior noise criteria. For this project, noise assessment is warranted in both the areas of stationary and mobile sources.

Stationary noise sources do not move in relation to a noise-sensitive receptor. Typical stationary noise sources of concern include machinery or mechanical equipment, such as those associated with a building's heating, ventilating, and air-conditioning (HVAC) system. The Proposed Actions would facilitate the development of new stationary sources due to mechanical equipment, and therefore a stationary source assessment will be provided. The Targeted EIS will assess project-generated stationary noise sources and noise generated by nearby stationary noise sources, including the playgrounds at the Castleton Park Apartments and noise generated by game day events at the Staten Island Yankees stadium.

Mobile noise sources move in relation to receptors. The mobile source screening assessment will address potential noise impacts associated with vehicular traffic generated by the Proposed Actions. Mobile noise assessment will be completed using proportional modeling of passenger-car-equivalents using traffic data analyzed in the Transportation assessment. This traffic data will be used to calculate the future No-Action and With-Action noise levels and determine if attenuation is warranted per the guidance set forth in the *CEQR Technical Manual*.

Noise survey locations were selected by examining the Projected Development Sites' location and the location of the dominant sources of ambient noise. Existing noise levels were determined at each location by performing field measurements. The measured noise levels will be used to determine minimum window/wall attenuation requirements to satisfy CEQR interior noise level criteria. If warranted, required window/wall sound attenuation would be defined and mandated through (E) designations placed on the Projected Development Sites. If the project would result in a significant adverse noise impact, the EIS would identify measures to avoid, minimize, or mitigate such adverse impacts.

Task 9: Public Health

As stated in the *CEQR Technical Manual*, Public Health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts on public health may occur as a result of a proposed project, and if so, to identify measures to mitigate such effects.

When no significant unmitigated adverse impact is found in other CEQR analysis areas -- such as air quality, water quality, hazardous materials, or noise -- a public health analysis

is not warranted. If unmitigated adverse impacts are found in any of these technical areas and the lead agency determines that a public health assessment is warranted, an analysis would be provided for the specific technical area or areas in accordance with CEQR guidelines. If the project would result in a significant adverse public health impacts, the EIS would identify measures to avoid, minimize, or mitigate such adverse impacts.

Task 10: Neighborhood Character

The character of a neighborhood is established by numerous factors, including land use patterns, the characteristics of its population and economic activities, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other physical features that include noise levels, traffic, and pedestrian patterns. Most of these elements will already be covered in other EIS sections but salient points from those analyses will be summarized. Tasks will include:

- Drawing on other Targeted EIS sections, the predominant factors that contribute to defining the character of the neighborhood will be described.
- Based on planned development projects, public policy initiatives, and planned public improvements, the changes that can be expected in the character of the neighborhood will be summarized.
- The Proposed Action's effects on neighborhood character relative to the No-Action Condition will be assessed and summarized.

If the preliminary assessment determines that the Proposed Actions would affect neighborhood character, a detailed analysis would be conducted in accordance with the *CEQR Technical Manual* guidelines. If the results of the assessment identify a potential for significant adverse impacts, potential practicable mitigation measures to avoid or reduce those significant adverse impacts will be identified

Task 11: Construction

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. The EIS will present the overall construction duration across the two projected development sites. Information will be provided on applicable oversight and regulations for various aspects of construction. Information on how New York City regulates construction hours will be described. The EIS will include a discussion of the construction period, equipment, and phasing. Because of the duration and location of construction, the potential for construction-period impacts in the areas of land use, transportation, air quality, noise, historic resources, and hazardous materials will be assessed per the guidance set forth in the *CEQR Technical Manual*. If the project would result in a significant adverse construction impacts, the EIS would identify measures to avoid, minimize, or mitigate such adverse impacts.

Task 12: Mitigation

Where significant impacts have been identified, measures to mitigate those impacts will be described. These measures will be developed and coordinated with the Lead Agency and other responsible City and State agencies as necessary. If identified impacts cannot

be mitigated, they will be described as unmitigated and unavoidable adverse impacts (see "EIS Summary Chapters" below).

Task 13: Alternatives

The purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce project-related significant adverse impacts while achieving the stated goals and objectives of the Proposed Project. Alternatives must be feasible, considering the objectives and capabilities of the project sponsor. Typically, alternatives to the Proposed Project are identified as project impacts are clarified during the preparation of the EIS.

The EIS will identify a No-Action Alternative, which assumes that the Proposed Actions would not be approved. In addition, if unmitigated significant adverse impacts are identified during the preparation of the EIS, a No-Unmitigated Adverse Impacts Alternative will be included to describe Proposed Project modifications needed to avoid any such impacts. Additional alternatives to the Proposed Actions will also be considered once the full extent of the impacts has been identified.

Task 14: EIS Summary Chapters

In accordance with *CEQR Technical Manual* guidelines, the Targeted EIS will include the following three summary chapters, where appropriate:

- Unavoidable Adverse Impacts—which summarizes any significant adverse impacts that are unavoidable if the Proposed Project is implemented regardless of the mitigation employed (or if mitigation is not feasible);
- Growth-Inducing Aspects of the Proposed Actions—which generally refers to "secondary" impacts of Proposed Actions that trigger further development; and
- Irreversible and Irretrievable Commitments of Environmental Resources—which summarizes the Proposed Actions and their impacts in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long-term.

Task 15: Executive Summary

The executive summary will utilize relevant material from the body of the Targeted EIS to describe the Proposed Actions, their significant and adverse environmental impacts, measures to mitigate those impacts, and alternatives to the Proposed Project.

RESPONSE TO COMMENTS ON THE DRAFT SCOPE OF WORK

1. Introduction

This document summarizes and responds to comments on the Draft Scope of Work (DSOW), issued on October 16, 2020 for the proposed River North (Liberty Towers) project (the "Proposed Actions"). Oral and written comments were received during the virtual public meeting held by the New York City Department of City Planning (DCP) on November 19, 2020. Written comments were accepted through the duration of the public comment period, which ended at 6 p.m. on Monday, November 30, 2020. The written and oral comments received on the Draft Scope of Work are provided in Appendix A. A Final Scope of Work was issued on May 3, 2021, incorporating comments received on the DSOW where relevant and appropriate.

Section 2 below lists the elected officials, organizations, and individuals that provided relevant comments on the DSOW. Section 3 contains a summary of and response to relevant comments. Comments are organized by subject matter and convey the substance of the issue but are not necessarily quoted verbatim. The comments and responses in Section 3 correspond to the commenters numbered in Section 2. A transcript of oral statements delivered at the virtual public meeting is provided in Appendix B. This Response to Comments on the Draft Scope of Work parallels the chapter structure of the DSOW.

2. List of Elected Officials, Organizations, and Individuals who Commented on the Draft Scope of Work

Elected Officials

1. Debi Rose, Councilmember 49th District, Staten Island; written submission dated November 30, 2020.

2. James Oddo, Staten Island Borough President; written submission dated November 16, 2020, co-signed by New York State Senators Andrew Lanza and Diane Savino, City Council Minority Leader Steven Matteo, Councilmember Joseph Borelli, and New York State Assembly Members Michael Reilly, Michael Cusick, and Charles Fall.

Organizations

3. Maria Free, New York Building Congress; oral statement delivered at public scoping meeting and written submission dated November 19, 2020.
4. Linda Dianto, National Lighthouse Museum; oral statement delivered at public scoping meeting and written submission dated November 13, 2020.
5. Leticia Remauro, Staten Island Downtown Alliance; oral statement delivered at public scoping meeting and an undated written submission.
6. Cesar J. Claro, President & CEO of the Staten Island Economic Development Corporation; oral statement delivered at public scoping meeting and written submission dated November 19, 2020.
7. Ralph Fortunato III, 36 Hamilton Avenue Tenants Corporation; written submission dated November 30, 2020.

Interested Public

8. Selvija Marovic; written submission dated November 17, 2020.
9. John O'Connor; written submission dated November 17, 2020.
10. Photini Kambos; written submission dated November 17, 2020.
11. Janet Mohlenhoff; written submission dated November 17, 2020.
12. John Grieme; written submission dated November 16, 2020.
13. Rosanne Farrell; written submission dated November 18, 2020.
14. Elizabeth Sergi Reha; written submission dated November 17, 2020.
15. Caoimhe Oleary; written submission dated November 20, 2020.
16. Jeff Conner; written submission dated November 19, 2020.
17. Stuart Donner; written submission dated November 17, 2020.
18. Pamela Minkoff; written submission dated November 18, 2020.
19. Michael Ciarlo; written submission dated November 15, 2020.
20. Gail Decker; written submission dated November 18, 2020.
21. Vincent Soriano; written submission dated November 15, 2020.
22. Robert McFeely; written submission dated November 15, 2020.
23. Barbara Wetmore; written submission dated November 17, 2020.
24. Tracy Schulman; written submission dated November 16, 2020.

25. Richard Ricco; written submission dated November 16, 2020.
26. James Ferreri; written submission dated November 16, 2020.
27. Lisa; written submission dated November 16, 2020.
28. Sean Caffrey; written submission dated November 15, 2020.
29. Susan Pulice; written submission dated November 15, 2020.
30. Anjail Ameen-Rice; written submission dated November 15, 2020.
31. Maria Zaharakis; written submission dated November 17, 2020.
32. Susan Roszak; written submission dated November 15, 2020.
33. Gary D'Amato; written submission dated November 17, 2020.
34. Dorothy McNamara; written submission dated November 18, 2020.
35. Michelle Ryan; written submission dated November 15, 2020.
36. John Taglialatela; written submission dated November 18, 2020.
37. Betula; written submission dated November 16, 2020.
38. Heather; written submission dated November 15, 2020.
39. Eddie Bernard; written submission dated November 16, 2020.
40. Philita Wondolowski; written submission dated November 15, 2020.
41. Peggy Abbaticchio; written submission dated November 17, 2020.
42. Carl Hilton; written submission dated November 16, 2020.
43. Mx. Joe-Anthony Sierra; written submission dated November 18, 2020.
44. Patrick Raftery; written submission dated November 17, 2020.
45. John Magnuski; written submission dated November 18, 2020.
46. John Molinari; written submission dated November 18, 2020.
47. Joanna Fredericks; written submission dated November 17, 2020.
48. Kathleen Baldassano; written submission dated November 17, 2020.
49. Debra Barone; written submission dated November 16, 2020.
50. Ranti Ogunleye; written submission dated November 30, 2020.
51. Mary Ward; written submission dated November 17, 2020.
52. John Grassadonio; written submission dated November 18, 2020.
53. Michael Butler; written submission dated November 15, 2020.
54. R.B.; written submission dated November 30, 2020.
55. Lee Anderson; written submission dated November 17, 2020.
56. Claudia Toback; written submission dated November 17, 2020.
57. Michael Morrell; written submission dated November 15, 2020.

58. Yan Lindvor; written submission dated November 17, 2020.
59. Elise Crumbley; written submission dated November 16, 2020.
60. Benjamin Donsky; written submission dated November 18, 2020.
61. Suzette Toal; written submission dated November 17, 2020.
62. Adriano Chinellato; written submission dated November 24, 2020.
63. Robert Stern; written submission dated November 17, 2020.
64. Karen Palmeri; written submission dated November 15, 2020.
65. Linda Cohen; written submission dated November 30, 2020.
66. Phil Marius; oral statement delivered at public scoping meeting.

3. Comments and Responses on the Draft Scope of Work

The numbers in the parentheses following comments in this section correspond with commenters as numbered in Section 2.

Project Description

Comment 1: **We need additional affordable housing (1). Having affordable homes, open space and attracting a population that can pay taxes and support being part of NYC should be the goal. (13) Out of the 750 potential units, only 225 of these units are marked affordable, about 30 percent. This is unacceptable in a borough, and city for that matter, that has seen months of jobs loss, stagnant or reduced wages, and rising costs of living for working families. (50) I am a Staten Island resident and concerned with the affordability of housing, so I would like this project to go forward. (60)**

Response 1: Comment noted.

Comment 2: **We request that the Department of City Planning reject the Liberty Towers proposal in its entirety. Our constituency does not want this proposed out-of-character project. (2) Do not allow high rise apartments or towers or R7 zoning (8, 9, 10, 11, 14, 15, 18, 19, 20, 23, 24, 25, 26, 27, 28, 29, 30, 32, 33, 34, 35, 38, 39, 41, 42, 43, 44, 46, 48, 49, 51, 52, 53, 55, 56, 57, 58, 59, 62, 63, 64) I oppose this project. (21, 22, 24, 31, 33, 34, 40, 44, 45, 50, 52)**

Response 2: Comment noted.

Comment 3: **River North advances the City's goals set forth in OneNYC, Housing New York and North Shore 2030. (3) I support the River North (Liberty Towers) Project because we need more residents, shoppers and life in St. George, particularly after 5:00 p.m. (6) The project will increase visitation and local spending for the small businesses and cultural institutions in the neighborhood. The site makes for prime visitation for a wide swath of patrons. (4) I support R7 zoning at this and similarly appropriate locations. (60)**

Response 3: Comment noted.

Comment 4: Mandatory Inclusionary Housing Option 1 is preferred because it's the units affordable for folks making much closer to the minimum wage and it allows room for the applicant to increase the stock of affordable units in this project. (65)

Response 4: Comment noted. To cover the range of the four affordability options (which require between 20 percent and 30 percent of new units be affordable housing depending on the option selected) available as part to the City's Mandatory Inclusionary Housing program, the Draft Environmental Impact Statement (DEIS) will assess the reasonable worst-case conditions of 30 percent of the proposed dwelling units being affordable units, with 20 percent of the total units reserved for households earning 80 percent or less the Area Median Income (AMI). The specific Mandatory Inclusionary Housing options will be affirmed by City Council.

Comment 5: The Castleton Park Apartments are unusual in this area, in height and bulk. Please provide history of zoning change initiations including R6 and Special Hillsides Preservation District for this area. (65)

Response 5: In response to this comment, the Project Description chapter of the DEIS will provide a history of zoning changes for the Rezoning Area.

Comment 6: DCP has recently published preliminary recommendations for changes for slopes and trees in Special Hillsides Preservation District. How does this project fit in? (65)

Response 6: Independent of the Proposed Actions, DCP is proposing changes to update zoning provisions of the Special Hillsides Preservation District. DCP's preliminary recommendations, published in June 2020, present goals to preserve steep slopes by modifying zoning provisions such as yards, building heights and lot coverage. Because these recommendations are preliminary and not yet adopted, they will not be considered in the DEIS. However, the Project Description chapter of the DEIS will provide a qualitative description of the regulations applicable in the Special Hillsides Preservation District.

Community Facilities

Comment 7: This project is estimated to bring 750 new residential units to the St. George neighborhood, which has faced significant infrastructure challenges related to school overcrowding. While the Environmental Assessment Statement (EAS) does not identify significant adverse impacts related to schools, the applicants and city agencies need to work together to include real solutions. (1) The schools are overcrowded already. (12, 35).

Response 7: As described in Attachment D, "Community Facilities" of the Environmental Assessment Statement (EAS), the Proposed Actions would not result in a significant impact to public schools. Per the guidelines set forth in the *CEQR Technical Manual*, a significant adverse impact would occur if a project would result in both of the following conditions:

- the utilization rate of the elementary or intermediate schools would be equal to or greater than 100 percent in the With-Action Condition; and
- the collective utilization rate between the No-Action and With-Action conditions would increase by five percent or more.

With the Proposed Actions, both elementary and intermediate schools in Subdistrict 4 would operate at a utilization rate well below 100 percent. Further, with up to 239 project-

generated public school students, the Proposed Actions would increase the school subdistrict's utilization rate by less than two percent.

Comment 8: **The Applicant and DCP should work together with: area hospitals, urgent care providers, and other non-profit organizations to identify the appropriate types and square-footage for health care needs in the area. The inclusion of a health care facility would be a meaningful improvement to the project. A daycare facility would also be a beneficial community facility use to include in the project. Currently there are very limited daycare options for families in the immediate vicinity of the proposed project. (1) Medical care is severely lacking. Mental health and drug addiction care is the poorest in the city. We are the only borough without a city hospital. (36, 46)**

Response 8: Per the *CEQR Technical Manual*, only actions that would introduce a sizable new neighborhood warrants an assessment of healthcare facilities under CEQR, and only actions that would result in 20 or more children under the age of 5 that would be eligible for publicly-funded childcare would warrant a daycare assessment. The Proposed Actions would not introduce a sizeable new neighborhood, and would generate fewer than 20 children under the age of 5 that would be eligible for publicly-funded daycare. Therefore, as described in Attachment D, "Community Facilities and Services" of the EAS, an analysis of healthcare facilities or publicly-funded daycare is not warranted. The Proposed Actions would allow a range of non-residential uses in the ground floor "commercial" spaces, including daycare, doctors' offices, urgent care facilities, not-for-profit institutions, retail, and commercial office space. The specific uses that would occupy the ground floor would be subject to market forces. However, to represent the reasonable worst-case effects of the Proposed Actions on traffic, noise, and air quality, the DEIS will examine the entirety of the proposed ground floor commercial uses as retail, which has a high vehicular and pedestrian generation rate and therefore represents reasonable worst case conditions. In the event the ground floor "commercial" spaces are occupied with other uses, the effects of these uses would be substantially similar to or less than the effects that would occur if these ground floor "commercial spaces" were occupied solely by retail.

Open Space

Comment 9: **Please provide analysis of current green open space acreage in the area and how the open space that this project will provide moves us towards (or away from) the open space goals of New Yorkers 4 Parks. (65)**

Response 9: The EIS will address issues related to Open Space consistent with the methodologies outlined in the *CEQR Technical Manual* and the Final Scope of Work. The *CEQR Technical Manual* uses New York City's open space planning goals as reference. The *CEQR Technical Manual* does not specifically address New Yorkers 4 Parks criteria, therefore, this will not specifically be included in the DEIS. Consistent with the *CEQR Technical Manual*, the DEIS will contain an open space assessment that will quantify the existing open space acreage and the residential open space ratio (acres per 1,000 residents) in the Open Space Study Area. The effects of the proposed privately-owned, publicly accessible passive open space on the Study Area's open space ratio will be analyzed in the open space chapter of the DEIS.

Shadows

Comment 10: **The apartments of 36 Hamilton Avenue Tenants Corporation enjoy natural sunlight all day and year long. The apartments facing Hamilton Avenue will lose the natural sunlight. Lack of natural light can have serious implications for those living in these apartments. The government's housing health rating system, which determines the standards demanded by housing officers, warns inadequate natural light poses a threat to physical and mental health. Sunlight is also known to boost vitamin D, which helps prevent bone loss and reduces the likelihood of various diseases. (6)**

Response 10: According to Attachment F, "Shadows" of the EAS, the Tier 3 shadows screening showed the Proposed Actions would not cast shadows on the apartment building at 36 Hamilton Avenue, which is located south of the Proposed Development. As shown in EAS Figure F-2 through Figure F-5 in Attachment F, 36 Hamilton Avenue is in an area that cannot be shaded by the Proposed Actions due to the siting of the proposed buildings and the path that the sun travels across the sky in New York City. Therefore, the Proposed Actions would not cast shadow on the apartment building at 36 Hamilton Avenue.

Comment 11: **Please provide analysis on sunlight and shadows on neighboring buildings and streets by the project. (65)**

Response 11: Per the CEQR, a shadows assessment is required for projects that would result in a net increase in building height of 50 feet or more. A shadows assessment analyzes whether new structures may cast shadows on sunlight sensitive publicly-accessible resources or other resources of concern - such as natural resources - and to assess the significance of their impact. According to the *CEQR Technical Manual*, however, city streets, sidewalks, and most buildings or structures are not sunlight-sensitive resources for CEQR purposes. Attachment F, "Shadows" of the EAS found that the Proposed Actions have the potential to cast shadow on historic, open space, and natural resources. Therefore, the shadows assessment presented in the EAS evaluated the worst-case shadowing effects of the Proposed Actions on the study area's historic resources (such as Curtis High School, Richmond Family Courthouse, and the St. George/ New Brighton Historic District), open space resources (such as North Shore Esplanade, and St. George Esplanade) and natural resources (Upper Bay). The EAS concluded that under worst case conditions (when the special permit is used, thereby allowing taller buildings), the Proposed Actions would not result in a significant adverse shadows impact.

Urban Design

Comment 12: **The apartments of 36 Hamilton Avenue Tenants Corporation enjoy the beautiful view of the Manhattan skyline as well as NYC Harbor. The view corridor will also be impacted by some units on the Hamilton Avenue side of the building according to the proposal. (6) Please, no multi storied buildings on Staten Island! We don't want our sight lines to the city blocked. (38)**

Response 12: According to the *CEQR Technical Manual*, "A visual resource is the connection from the public realm to significant natural or built features, including views of the waterfront, public parks, landmark structures or districts, otherwise distinct buildings or groups of buildings, or natural resources." Therefore, views from the private realm such as residences towards the city are not considered significant per CEQR. The EAS concluded

the Proposed Actions would not result in a significant adverse urban design and visual resources impact. As designed, Building 1, the proposed building nearest 36 Hamilton Avenue, would be set back approximately 30 feet from Hamilton Avenue, consistent with other front yards along the north side of Hamilton Avenue on the project block. View corridors from St. George towards the Manhattan and Downtown Brooklyn skylines generally run parallel to the alignment of Hamilton Avenue along the local streets. The proposed approximately 30-foot setback from Hamilton Avenue would retain the existing view corridors along Hamilton Avenue, including from private residences at 36 Hamilton Avenue, towards Manhattan and Downtown Brooklyn.

Comment 13: We need an updated skyline - a skyline of our own. I hope to see some beautiful buildings when I come in on the ferry or as I am driving on the Gowanus Expressway. (54)

Response 13: Comment noted.

Water and Sewer Infrastructure

Comment 14: The St. George neighborhood has aging sewer infrastructure. (1) There is inadequate infrastructure to serve this project. (20, 21, 22, 32, 44, 53, 57, 63)

Response 14: Overall, EAS Attachment J, "Water and Sewer Infrastructure" determined the Proposed Actions would not result in a significant adverse water and infrastructure impact. With respect to water demand, in a memorandum to the Department of City Planning dated December 11, 2019 (see Appendix H to the EAS), the NYC Department of Environmental Protection (DEP) concluded that "the existing water infrastructure should be capable to handle the estimated increase in water demand generated by a development of this magnitude." Therefore, the Proposed Actions would not result in a significant adverse water supply impact.

With respect to wastewater, EAS Attachment J, "Water and Sewer Infrastructure" describes how wastewater generated by the Proposed Actions would be treated at the Port Richmond Wastewater Treatment Plant (WWTP), which has an excess of approximately 35.27 millions of gallons per day (mgd). The Proposed Actions would generate up to 0.23 mgd of wastewater flows at the Port Richmond WWTP, and the WWTP can accommodate the incremental flows from the Proposed Actions without exceeding the WWTP's design capacity. Therefore, the Proposed Actions would not result in significant adverse wastewater treatment impacts. In its review of the EAS, DEP determined the Proposed Actions would result in an increase of sanitary flow to the adjacent sewers, and that "a hydraulic analysis will likely be required prior to the submittal of the Site Connection Proposal Application to determine whether the existing sewer system is capable of supporting higher density development and related increase in wastewater flow, or whether there will be a need to upgrade the existing sewer system." If a hydraulic analysis is required during the Site Connection Proposal Application process, and the hydraulic analysis indicates a need to upgrade the existing sewer system, the Applicant would explore the appropriate measures with DEP independent of CEQR.

Comment 15: Sewage – Please provide analysis on how this project will impact our waterways and outdated Port Richmond Treatment Plant which currently discharges millions of gallons of raw sewage into the Kill Van Kull. (65)

Response 15: See response to comment 14.

Comment 16: How will stormwater and sewage be affected/contained by this project? (37)

Response 16: As described in EAS Attachment J, "Water and Sewer Infrastructure" in the With-Action Condition, planned impervious cover would be increased compared to the No-Action Condition. In the With-Action Condition, the projected development sites would be fully developed. The weighted runoff coefficient for the combined sites would be 0.78, an 85 percent increase in the weighted runoff coefficient over the No Action Condition. Wastewater would continue to be directed the Port Richmond WWTP in the With-Action Condition. Depending on intensity and continuity during storm events with up to 2.5 inches of rainfall, direct discharge volumes to the combined sewer system (CSS) would range between 0.00 and 0.160 million gallons per day (mgd). Sanitary flow from the Projected Development Sites would contribute between 0.031 to 0.159 mgd to the Port Richmond WWTP. Stormwater flows in the With-Action Condition would represent an increase of 0.12 mgd over the No-Action Condition.

All new developments are required to comply with Chapter 31 of Title 15 (Rule Governing House/Site Connections to the Sewer System) of the Rules of the City of New York (RCNY), which sets forth the requirements for new developments to connect to the City's sewer system. The Stormwater Release Rate must be no more than the greater of 0.25 cubic feet per second (cfs) or 10 percent of the allowable flow or, if the allowable flow is less than 0.25 cfs, no more than the allowable flow. The required restricted flow rate for the project can be achieved through subsurface, roof, or tank detention systems on the development sites and these features will be incorporated into project design. Therefore, EAS concluded the Proposed Actions would not result in significant adverse stormwater impacts to New York City's stormwater infrastructure or treatment facilities.

Transportation

Traffic/Congestion

Comment 17: The St. George neighborhood has challenges related to traffic congestion. (1) Traffic is becoming a nightmare. Additional high rise apartments will only add to the congestion and could result in residents leaving the borough for less crowded areas of New Jersey. (8) The project will increase traffic and congestion. (13, 23, 24, 37, 44, 45, 46, 48, 56)

Response 17: As noted in the Draft Scope of Work, the EIS will include a detailed assessment of the proposed project's potential for impacts with respect to vehicular traffic, consistent with the methodologies outlined in the *CEQR Technical Manual*. The traffic impact analysis for the Proposed Actions will be conducted by adding project-generated trips onto the Future No-Action traffic network. Physical and operational changes resulting from the Proposed Actions will also be incorporated into the analyses. If significant adverse traffic impacts are identified, measures will be recommended to mitigate such impacts.

Transit

Comment 18: There is a lack of public transportation. (36, 44) St. George and the ferry area is very crowded already, and the busses and trains in the vicinity are pushed to capacity. (46)

Response 18: The Project Area is served by three different transit modes at the nearby St. George Terminal: the NYCDOT Staten Island Ferry to Manhattan, the MTA Staten Island Railway to Tottenville, and numerous MTA NYCT local Staten Island bus routes. Since the issuance of the Draft Scope of Work, the City announced an expansion to the fast ferry service to St. George. As stated in the Draft Scope of Work, a qualitative description of available transit options in the study area (including the proposed fast ferry expansion) will be included in the transportation analyses, and quantitative analyses will be prepared, if needed, based on the guidance provided in the *CEQR Technical Manual*.

Pedestrians

Comment 19: There is not enough sidewalk space available for that many people in the St. George neighborhood. (48)

Response 19: As stated in the Draft Scope of Work, a pedestrian assessment will be conducted in accordance with *CEQR Technical Manual* criteria. If significant adverse pedestrian impacts are identified, mitigation measures will be recommended to mitigate such impacts.

Parking

Comment 20: The project needs more parking. (45) There is not enough on-street parking. (6, 16, 48, 63)

Response 20: As stated in the Draft Scope of Work, parking surveys will be performed within a ¼-mile study area (per CEQR guidance) to record on-street and off-street parking supply and utilization. Parking accumulation estimates for the Proposed Actions will be developed to identify peak parking time periods and 24-hour in/out activities for the proposed on-site parking facilities. Project-generated parking demand projections will be compared to the available supply in the study area to determine if project-generated demand could result in a potential for parking shortfall. The effects of the displacement of on-street parking spaces as a result of traffic mitigation measures will also be addressed if warranted.

Safety

Comment 21: A project of this scale will also compromise the safety of everyone. (6) Roads and sidewalks are poorly maintained. (12)

Response 21: As stated in the Draft Scope of Work, a Vehicular and Pedestrian Safety assessment will be conducted in accordance with *CEQR Technical Manual* criteria to identify potential safety concerns and to recommend measures to alleviate such concerns.

Other Transportation

Comment 22: Connect Richmond Parkway. Extend Father Cappadanno past New Dorp Lane. (35) Build subway from St. George to Lower Manhattan. (39) The SI Railroad should be restored along the North Shore to Amazon (distribution facility on the West Shore) and

Mariner's Harbor. (43) More tolls are needed on the bridges between Staten Island and New Jersey. (36)

Response 22: These items are outside the scope of work for the Proposed Actions.

Air Quality

Comment 23: As a lifelong Staten Islander, I have seen how lack of planning has caused congestion and air quality issues to this borough. Having high-rise housing in the St. George area will just exacerbate these problems. (13)

Response 23: As stated in the Draft Scope of Work, an air quality assessment will be conducted in accordance with the *CEQR Technical Manual* to evaluate the potential for the Proposed Actions to result in significant adverse air quality impacts. The assessment will analyze both stationary and mobile air quality emissions sources.

Noise

Comment 24: A project of this scale will generate extreme noise pollution. (6)

Response 24: As stated in the Draft Scope of Work, a noise assessment will be conducted in accordance with the *CEQR Technical Manual* guidance to evaluate the potential for the Proposed Actions to result in significant adverse noise impacts. The assessment will analyze both stationary and mobile noise sources as well as the construction-period effects to noise conditions.

Neighborhood Character

Comment 25: St. George is a unique neighborhood consisting of historic single and two family homes and mixed use, multi-story rentals and condominiums. It is one of Staten Island's few walking neighborhoods. It is also the neighborhood most visited by tourists. Madison Realty Capital's project will enhance the draw that St. George has for Staten Islanders who prefer to live in an active, walkable neighborhood with access to shopping, theater, office buildings and more. The project includes an 8,000 square foot public plaza with iconic views of the harbor and city skyline. (5)

Response 25: Comment noted. As stated in the Draft Scope of Work, the DEIS will evaluate the potential for the Proposed Actions to result in significant adverse neighborhood character impacts in accordance with the *CEQR Technical Manual,* which, as noted in the Draft Scope of Work, include analyzing land use patterns, the scale of neighborhood development and building design, the presence of notable landmarks, and a variety of other physical features that include noise levels, traffic, and pedestrian patterns. The DEIS will describe the predominate factors that contribute to defining the neighborhood character and analyze the effects of the Proposed Actions on neighborhood character relative to the No-Action Condition.

Comment 26: Plans for construction of multi floor developments will not and does not fit into the warmth and neighborliness of this community. (17) We do not want R-7 zoning on Staten Island. Please do not destroy the Islands character. (33) A 26-story tower is totally out of character for the St. George neighborhood and Staten Island as a whole.

(47) The area is saturated already with large scale developments, changing the character of the St. George/New Brighton Historic District. (36)

Response 26: See response to Comment 25.

Alternatives

Comment 27: While the special permit itself will set certain height limits, the applicant may not elect to utilize the special permit. The EIS does not appear to include an analysis of what kind of impacts would be created if the applicant (or future property owners) were to build a new building under the proposed R7-3 zoning district without the special permit. (1)

Response 27: The DEIS will evaluate the reasonable worst case development scenario of the Proposed Actions, which includes the use of the special permit to waive certain underlying bulk requirements. In the event the Applicant (or future property owners) were to develop the site without using the special permit, the effects would be similar to or less than the effects analyzed in the DEIS, because development without the special permit would have the same maximum floor area ratio (FAR) of 6.0 as the Proposed Actions' reasonable worst case development scenario (the DEIS will conservatively analyze 6.03 FAR on Projected Development Site 1, which is 0.03 FAR beyond what would be permitted with the Proposed Actions). Thus, the reasonable worst case development scenario would have greater environmental effects than a development scenario where the special permit is not used (however, because of the streetwall requirements and reduced envelope, an R7-3 alternative without the use of the special permit would likely preclude the development of a publicly-accessible open space).

Comment 28: To ensure the local community is not blindsided by unexpected and unattractive tower construction, the applicants and DCP should modify the application to include the R7X zoning designation within the project area. The R7X includes the same amount of FAR as what is currently proposed, but would require "quality housing" construction, and also sets a 145-foot height limit on new construction. The applicant is proposing several waivers to bulk regulations in its special permit application, and similar modifications could be made for the R7X zoning district. (1)

Response 28: The proposed R7-3 zoning in the Special St. George District would allow buildings up to a roof height of 185 feet (plus bulkhead) as-of-right, which could be modified by the CPC with the proposed special permit pursuant to ZR 128-62. R7X districts allow buildings up to a roof height of 145 feet (plus bulkhead) as-of-right, 40-feet (four stories) less than the proposed underlying 185-foot height limit of R7-3 in the Special St. George District. Generally, it is against the City's zoning policy to map a contextual district and concurrently waive the contextual heights through an additional action (such as a zoning special permit). Because R7-3 and R7X would allow the same density (a floor area ratio of 6.0), the effects of an R7X alternative would be similar or less than those of the Proposed Actions (however, because of the reduced envelope and streetwall requirements, an R7X alternative without a special permit would likely preclude the development of a publicly-accessible open space).

APPENDIX A – COMMENTS RECEIVED ON THE DRAFT SCOPE OF WORK

Commenter 1: **Debi Rose, Councilmember 49th District, Staten Island; written submission dated November 30, 2020.**

Director Abinader:

I am writing to submit comments in response to the proposed Draft Scope of Work for an Environmental Impact Statement (EIS) for River North (formerly Liberty Towers). This project is estimated to bring 750 new residential units to the St. George neighborhood which has faced significant infrastructure challenges related to school overcrowding, aging sewer infrastructure, and traffic congestion. We cannot continue to approve additional density without ensuring that this community had adequate facilities for existing and new residents. While the Environmental Assessment Statement (EAS) does not identify significant adverse impacts related to schools and sewer infrastructure, the applicants and city agencies need to work together to include real solutions to these problems before I can support a project of this scale. We need additional affordable housing on the North Shore, but we cannot ignore the infrastructure challenges that continue to exist and degrade the quality of life for local residents.

If the applicants continue to pursue this rezoning, there are several issues that must be resolved before this project is certified into ULURP. These issues are identified below.

Community facility uses must be analyzed

The EIS must analyze a meaningful square footage of community facility uses in the applicant's special permit project. Although as presently proposed, there would be no community facility in the special permit project, community facility should be analyzed in the environmental review to accommodate changes as the project proceeds through ULURP. In light of the COVID-19 pandemic, a project of this scale has the potential to solve some of the inequities that were not so hidden before the pandemic.

The FEIS from the Bay Street Rezoning (CEQR#: 16DCP156R) identified how strained North Shore hospital and urgent care facilities were before the pandemic. Now, we need to be

hyper-vigilant in filling those gaps in delivering health care needs. The applicant and DCP should work together with: area hospitals, urgent care providers, and other non-profit organizations to identify the appropriate types and square-footage for health care needs in the area. The inclusion of a health care facility would be a meaningful improvement to the project.

A daycare facility would also be a beneficial community facility use to include in the project. Currently there are very limited daycare options for families in the immediate vicinity of the proposed project. A daycare service could serve the population being introduced to the area, but also the children of parents who commute past this project site for work.

R7X district should be analyzed as a lower height alternative

This community deserves predictable outcomes from future development. While the special permit itself will set certain height limits, the applicant may not elect to utilize the special permit. The EIS does not appear to include an analysis of what kind of impacts would be created if the applicant (or future property owners) were to build a new building under the proposed R7-3 zoning district without the special permit.

To ensure that the local community is not blindsided by unexpected and unattractive tower construction, the applicants and DCP should modify the application to include the R7X zoning designation as the underlying zoning designation within the project area. The R7X includes the same amount of FAR as what is currently proposed, but would require "quality housing" construction, and also sets a 145-foot height limit on new construction. The applicant is proposing several waivers to bulk regulations in its special permit application, and similar modifications could be made for the R7X zoning district.

Please feel free to contact my office if you have any questions. Thank you for your consideration.

Sincerely,

Councilmember Debi Rose

NYCC, 49th District

Commenter 2: **James Oddo, Staten Island Borough President, co-signed by New York State Senators Andrew Lanza and Diane Savino, City Council Minority Leader Steven Matteo, Councilmember Joseph Borelli, and New York State Assembly Members Michael Reilly, Michael Cusick, and Charles Fall; written submission dated November 16, 2020.**

Dear Chairperson Lago:

We, the undersigned, collectively represent the 475,000 residents of the Borough of Staten Island, and we are writing to request that the Department of City Planning reject the Liberty Towers proposal in its entirety. Simply put, our constituency does not want this proposed out-of-character project, one that would so dramatically infringe upon their neighborhood's quality of life.

For the last forty years, Islanders have been expressing concerns about mid- and high-density development projects that would trample the borough's unique residential character. City Planning has always assured Staten Island residents that the predominately low-density communities of the Borough would be protected and preserved. In 1985, to

that end, City Planning began a series of downzoning applications to remove most R6 districts from Staten Island. The applications acknowledged the concerns of many communities and elected officials by removing higher-density districts from the Borough forever. The effort continued – regardless of ongoing as-of-right proposals - until almost all the vacant R6 parcels in the Borough were rezoned.

However, the latest iteration of the Borough Planning Office seems exceedingly more inclined to ignore the will of the people, and are now promoting the tallest structures ever considered for approval in the borough. The proposed R7-3 rezoning is unprecedented, and represents the first time in the history of our borough that a residential zone of this density has been considered. This particular portion of St. George is not the place for a maximum building height of 185', which is more appropriate for Long Island City-type views and density. To add City Planning insult to Staten Island injury, the applicant is requesting an almost seventy percent increase in the permitted maximum building height.

It appears that the density of the surviving R6 zoning designation, the outrageous maximum as-of-right height of the proposed R7-3 district, the Special Hillsides Preservation District, and the assumed protections for those unique properties located in the St. George Special District, is not enough for City Planning to flinch. Additionally, we are once again presented with a voluminous environmental assessment whereby the study area is carefully manipulated so that the results so important to Staten Islanders simply do not matter.

City agencies should be reviewing the merits of discretionary approvals based on their context within the existing community, as well as the overwhelming will of the stakeholders who live and work there. This should in no way be solely about the return on investment for the applicant. No, this is also about respecting the investments made over an extended period of time by the community, investments that have contributed to the quality of life at Staten Island's front door. They have a right to preserve the character of their neighborhood and should not have to constantly be defending St. George from the latest agency proposals that go beyond the existing zoning standards. Their voices matter, too, do they not?

We will respond in writing more specifically on the scope of work, but we take this opportunity to say universally and publicly: "Enough!"

Enough of ignoring the wishes and opinions of people of Staten Island. Enough of enabling oversized proposals to navigate quickly through the process, while holding up smaller one-family applications for years. Enough of ignoring overcrowded schools in underserved communities with insufficient infrastructure. And finally, enough of disingenuously pretending that what Staten Islanders and their elected representatives say even matter, when the outcome is invariably predetermined.

Commenter 3: **Maria Free, New York Building Congress; oral statement delivered at public scoping meeting and written submission dated November 19, 2020.**

Good Afternoon,

My name is Maria Free, and I am the Urban Planning and Policy Analyst for the New York Building Congress. We are proud to support Madison Realty's proposal for River North and are excited to see the project move through environmental review.

The New York Building Congress has, for almost 100 years, advocated for investment in infrastructure, pursued job creation and promoted preservation and growth in the New York City area. Our association is made up of over 550 organizations comprised of more than 250,000 professionals. Through our members, events and various committees, we seek to address the critical issues of the building industry and promote the economic and social advancement of our city and its constituents.

In alignment with that mission, the Building Congress believes River North will support the economic renaissance that has been taking place in St. George. The site with the proposed zoning amendments will become a northern anchor for the commercial corridor of Stuyvesant Place, which includes the Staten Island Yankees Stadium, Empire Outlets and Lighthouse Point.

By adding affordable housing, retail and public open spaces near the St. George transit hub, River North advances the City's goals set forth in OneNYC, Housing New York and North Shore 2030. The project will have 225 affordable housing units, making it one of the borough's largest sources of affordable housing, as well as 50,000 square feet of landscaped and natural open space. The proposed site plan also retains views from upland areas and enhances access to the waterfront for both residents and visitors.

River North would transform an underused site into an important piece of St. George's vibrant urban fabric, and the Building Congress looks forward to the proposal becoming a reality.

Commenter 4: Linda Dianto, National Lighthouse Museum; oral statement delivered at public scoping meeting and written submission dated November 13, 2020.

To the Department of City Planning,

My name is Linda Dianto, and I am the Executive Director of the National Lighthouse Museum. Our organization is dedicated to the full development of the National Lighthouse Museum on the site of the US Light House Service General Depot on Staten Island from 1864 to 1939. Partnering with government agencies, non-profits, corporations, foundations, and other organizations, we will work to promote and support historical, educational, cultural, recreational, and other related activities at the site, while maintaining the navigational significance and maritime heritage of lighthouses throughout the world.

I am writing this letter to express my support for Madison Realty Capital's Liberty Towers proposal. This proposed development will increase visitation and local spending for the small businesses and cultural institutions in the neighborhood that have contributed to its charming and vibrant character for years. The Liberty Towers site is located steps away from several means of transportation to and around the borough, including the St. George Ferry Terminal, the Staten Island Railroad, and a dozen bus lines. This makes the site prime for visitation from a wide swath of potential patrons. The additional residential units, retail, and approximately 8,000 square foot public plaza in this proposal will add to the neighborhood's existing draw and create new means for street front activation.

It is for these reasons that I support Madison Realty Capital's Liberty Towers proposal. Thank you for your time and consideration.

Sincerely,

Linda Dianto, Executive Director

Commenter 5: Leticia Remauro, Staten Island Downtown Alliance; oral statement delivered at public scoping meeting and an undated written submission.

To the Department of City Planning,

The Staten Island Downtown Alliance supports Madison Realty Capital's River North/Liberty Towers project because it will provide an opportunity for Staten Island young married couples, seniors and young professionals who are increasingly seeking vertical, rental living in a suburban setting to remain a part of their community rather than leaving for New Jersey and communities south.

Similar to the Pier 21 Development project approved by CB 1, the Borough President, City Council and City Planning in 2017, River North/Liberty Towers offers rental units in close proximity to public transportation with stunning waterfront views. Similar to Battery Park City, Tribecca and Urby, River North/Liberty Towers offers majority market rate rentals with a percentage of workforce rate units suitable for Staten Island retirees and young people whose income is limited. It is the type of project that will provide much needed density in an area that Curbed NY has called one of the hot new neighborhoods in New York City.

The Staten Island Downtown Alliance has long advocated for comprehensive, well planned residential development along Staten Island's north shore because it is the one area of our borough that is served by every form of public transportation ie: bus, train and ferry. We recognize that residential buildings such as The View on Nicholas Street, The Rail on Bay Street, The Accolades at Bay Street Landing, The Pointe on Bay Street, Urby on Front Street and the soon to be completed, Lighthouse Point adjacent to the ferry have and will bring much needed economic stabilization and increased safety to the area. By increasing rental opportunities along the north shore transportation corridor, we should be able to avoid detrimental developments such as the homeless shelter proposed by WIN at the corner of Victory Boulevard and Bay Street which will undermine all the gains we have made in the Downtown area.

Attracting residents with disposable income into a neighborhood which has long been economically challenged is necessary to attract amenities. Empire Outlets, Key Food, Bay Dental at the Pointe and Downtown Plaza are examples of amenities that came to the north shore because of the planned increase in density. These amenities can only be sustained if developments such as River North/Liberty Towers is allowed to move forward. The more amenities a neighborhood has, the more desirable it becomes hence increasing property values for those residents who have invested in the community over the years.

St. George is a unique neighborhood consisting of historic single- and two-family homes and mixed use, multi-story rentals and condominiums. It is one of Staten Island's few walking neighborhoods. It is also the neighborhood most visited by tourists. Madison Realty Capital's project will enhance the draw that St. George has for Staten Islanders who prefer to live in an active, walkable neighborhood with access to shopping, theater, office buildings and more. The project includes an 8,000 square foot public plaza with iconic views of the harbor and city skyline. It also removes an eye sore of a vacant lot that has existed for far too long. Keeping Staten Islanders on Staten Island will be essential for the borough's recovery from the COVID-19 pandemic, and for the betterment of our economy for years to come.

As the Local Development Corporation serving the St. George, Tompkinsville, Stapleton, Clifton and Rosebank areas, the Staten Island Downtown Alliance supports the River North/Liberty Towers Project and urges City Planning, the City Council, the Borough President and Community Board 1 to support it as well.

Leticia Remauro, Secretary

Bayview Community Council, Inc. dba Staten Island Downtown Alliance

Commenter 6: **Cesar J. Claro, President & CEO of the Staten Island Economic Development Corporation; oral statement delivered at public scoping meeting and written submission dated November 19, 2020.**

I have been involved in economic development on Staten Island for over 25 years. I have listened to many elected officials, community leaders, developers and others tell me how St. George could be "the next Williamsburg," a "tourist mecca," a "great place for family fun" etc. I have watched as countless projects have come and gone. A failed Wheel, an under-performing Retail Outlet, a Ballpark about to go out of business and so on. I think it is time for all the stakeholders to admit the truth about St. George……..there simply are not enough people living there!

I am writing today to express my support for the River North (Liberty Towers) Project because we need more residents, shoppers and life in St. George, particularly after 5:00 p.m.

Since 1993, the Staten Island Economic Development Corporation (SIEDC) has served the business community of Staten Island and contributed to its fiscal growth. The organization's mission is to enhance a thriving Staten Island economy by promoting public and private investment, and encouraging the development of commercial and industrial property and projects in an environmentally friendly manner, all of which improve the quality of life and provide broad and diverse employment opportunities. SIEDC currently administers over 30 projects, programs, and services that assist businesses and entrepreneurs from a wide variety of industry sectors and at various levels of business development. Each year the organization provides services to more than 3,000 businesses and individuals.

SIEDC has been intimately involved in the development of St. George and the surrounding neighborhoods. In 2007, SIEDC originally proposed the repurposing of the parking lots at the ferry terminal adjacent to the Richmond County Bank Ballpark, which led to the development of the Empire Outlets; worked closely with Lighthouse Point to apply through the Consolidated Funding Application to secure significant tax benefits in 2016 and most recently secured a $10 million grant for the area from New York State through the Downtown Revitalization Initiative. In 2020, we completed a Brownfield Study of St. George, funded by NYC Office of Environmental Revitalization. SIEDC staff serve on the Bay Street Corridor Technical Advisory Committee assembled by the New York City Department of City Planning and the New York City Economic Development Corporation which worked to guide the recent Bay Street rezoning.

Staten Island is emerging and the Staten Island Economic Development Corporation is a major part of that emergence. Now more than ever it is critical that Staten Island continue to keep an ambitious pace in order to remain competitive and meet the needs of the community and the City. In the area dubbed "Downtown Staten Island," the historic

central business district and government hub for Staten Island, major projects have recently been launched (Empire Outlets), are near completion (Lighthouse Point) or are at a turning point in their existence (Richmond County Bank Ballpark). Bringing more people to St George can only help these fledgling projects.

Downtown Staten Island must engage in smart development to capitalize on this existing momentum and fully realize its vision to become a vibrant and thriving world-class destination.

With the River North project embarking on its first real opportunity for public comment, the SIEDC would like to share with the Department of City Planning its support for this project. The proposed development will continue the renaissance that has been taking place in St. George. This is a moment in time where the future of New York City lies in the balance. Madison Capital is completely prepared to fulfill its commitment to advance the project to fruition, bring positive change in the community, deliver good sustainable jobs in the long term, and stimulate the neighborhood's economic base while providing one of the largest number of affordable units in Staten Island.

The Proposed Actions would transform a long-standing vacant and underutilized site in Downtown St. George into a vibrant mixed-use development with housing, retail and open space. Approximately 750 housing units including approximately 225 affordable housings units (30 percent) critical to the Community District and Borough would be included. Over 50,000 square feet of landscaped and natural open space, including an approximately 8,000 square-foot publicly accessible plaza with amenities for the community including ground floor retail, and a lush public garden with public seating and an overlook to the waterfront and bay, would further enhance this project. This is a design that seeks to achieve the goal of providing much needed housing in this high-density area, while making a meaningful contribution to the neighborhood aesthetic in a way that serves the community beyond the residents and tenants that will ultimately fill the units.

The existing retail corridor of Stuyvesant Place would be improved by creating a northern anchor and will provide the connective tissue with ground floor retail, widened sidewalks and street trees, between the St. George waterfront and the upland residential neighborhoods. Consequently, the retail and pedestrian environments would be greatly improved as opportunities for local businesses to thrive outside of traditional business hours would be provided. Current visual corridors will be maintained and include the upland areas through the development to the waterfront and East River. The proposed design would contribute to the streetscape and skyline of Staten Island, reflecting the Borough's position as a destination and as a livable and sustainable neighborhood.

Of special note, the thoughtful design would also provide a unique and diverse living and commuting experience (SI Ferry, SIRR, North Shore, BRT, buses and private vehicles) for existing and future Staten Island residents. Limited transportation options have been a longstanding issue for local Staten Island residents, and have been a true deterrent to those seeking an affordable option within the five boroughs. The location of this project supports both populations.

On a final note, for the past two years, my staff and I have met with over two dozen Manhattan and Brooklyn-based housing developers in an attempt to secure their interest in Staten Island. Every firm we met with was not interested. Non-supportive political environment, high union labor, bad zoning and limited land have made Staten Island

unattractive to housing firms. We give Madison Realty Capital a great deal of credit in "taking a chance" on a borough shunned by everyone else.

Thank you for considering our support.

Commenter 7: **Ralph Fortunato III, 36 Hamilton Avenue Tenants Corporation; written submission dated November 30, 2020.**

To whom it may concern,

We at 36 Hamilton Avenue Tenants Corporation have been reviewing the proposed plans for Liberty Towers here in St. George Staten Island. There are concerns that residents have, and we feel it is necessary to have these addressed.

The apartments of 36 Hamilton Avenue Tenants Corporation enjoy natural sunlight all day and year long. The apartments facing Hamilton Avenue will lose the natural sunlight. Lack of natural light can have serious implications for those living in these apartments. The government's housing health rating system, which determines the standards demanded by housing officers, warns inadequate natural light poses a threat to physical and mental health. Sunlight is also known to boost vitamin D, which helps prevent bone loss and reduces the likelihood of various diseases.

The apartments of 36 Hamilton Avenue Tenants Corporation enjoy the beautiful view of the Manhattan skyline as well as NYC Harbor. The view corridor will also be impacted by some units on the Hamilton Avenue side of the building according to the proposal. This will have an impact on many residents.

There is a concern for congestion, parking and traffic issues within the area, primarily the adjacent roads. Parking is an issue in St. George and with the volume of people projected to live within this project will naturally contribute to congestion, parking and traffic issues. A project of this scale will also compromise the safety of everyone and generate extreme noise pollution.

We at 36 Hamilton Avenue Tenants Corporation welcomes open communication with the developers in hopes of rectifying these concerns. A project this size will most definitely impact the neighborhood but more importantly our adjacent property.

Respectfully,

Board of Directors

36 Hamilton Avenue Tenants Corporation

36 Hamilton Avenue

Staten Island, NY 10301

Commenter 8: **Selvija Marovic, written submission dated November 17, 2020.**

Hi, please do not allow the building of high rise apartments on Staten Island. The borough is getting overcrowded. Traffic is becoming a nightmare. Additional high rise apartments will only add to the congestion and could result in residents leaving the borough for less crowded areas in New Jersey.

Commenter 9: **John O'Connor, written submission dated November 17, 2020.**

Please stop the rezoning in St George. We lack adequate infrastructure. Ty

Commenter 10: Photini Kambos, written submission dated November 17, 2020.

Stop Rezoning in St. George, Staten Island! We, the residents of Staten Island DO NOT want to build two towers in St. George -- a 26-story tower and a 25-story tower. We already have enough infrastructure problems as it is with severe traffic issues, etc. Listen to our Borough President James Oddo! He accurately represents our needs and our wants for OUR borough!

Commenter 11: Janet Mohlenhoff, written submission dated November 17, 2020.

The St. George area in Staten Island should not be rezoned. There is enough congestion and little infrastructure for the area now. Rezoning that area will only bring additional congestion. It is bad enough that the Empire Outlets have contributed additional traffic with little benefit to Staten Islanders. We do not need additional apartment buildings or high rise buildings. The residents of that area do not want this nor to the residents that regularly travel to that area to get to work. DO NOT REZONE!

Thank you

Commenter 12: John Grieme, written submission dated November 16, 2020.

R7 zoning anywhere on Staten Island is not acceptable. Our schools are overcrowded already, our electrical grid is stressed, roads and sidewalks are poorly maintained, public transportation is practically non-existent, and on and on.

This should not have even been considered. To me, it feels like yet another swipe at Staten Island.

Commenter 13: Rosanne Farrell, written submission dated November 18, 2020.

As a life long Staten Islander, I have seen how lack of planning has caused congestion and air quality issues to this borough. Have high-rise housing in the St. George area will just exacerbate these problems. The future of Staten Island is to increase its safety and desirability which will not be done through having high rise buildings, Having affordable homes, open space and attracting a population that can pay taxes and support being part of NYC should be the goal. Vote against this measure.

Commenter 14: Elizabeth Sergi Reha, written submission dated November 17, 2020.

Stop the rezoning in St. George, Staten Island!

Commenter 15: Caoimhe Oleary, written submission dated November 20, 2020.

Please Stop Rezoning In St. George !!!

Commenter 16: Jeff Conner, written submission dated November 19, 2020.

In short , please stop resining and destroying Staten Island any more than it is. We don't have the infrastructure to handle large buildings . Please - enough is enough already. We can barely move as it is.

Commenter 17: Stuart Donner, written submission dated November 17, 2020.

I have been a resident of Staten Island for over 50 years and love the small town atmosphere of the St. George neighborhood. Plans for construction of multi floor developments will not and does not fit into the warmth and neighborliness of this community. Please do not let this project come to fruition

Commenter 18: **Pamela Minkoff, written submission dated November 18, 2020.**

I am writing today to ask you to stop ignoring what Staten Islanders want for Staten Island, and to stop trying to force feed us your ideas. I do not want to see 2 high rise buildings built in the St. George area on Staten Island!

Commenter 19: **Michael Ciarlo, written submission dated November 15, 2020.**

Do not change the zoning in Staten Island.

Commenter 20: **Gail Decker, written submission dated November 18, 2020.**

Dear Planning Committee,

I have lived on Staten Island for my entire life of 58 years and I am a second generation Staten Islander. I do not want St. George area to be rezoned to accommodate high rise buildings! There is no infrastructure in St. George to handle this. It is overcrowded enough. Please don't let this happen to us!

Sincerely,

Gail Decker, concerned Staten Islander

Commenter 21: **Vincent Soriano, written submission dated November 15, 2020.**

I am writing to strongly oppose and say NO to the proposed zone change to bring R-7 zoning to Staten Island. This is nothing more than a money grab and more greed by the developers. It is time our city officials weren't bought off by these developers but rather did the right thing for the citizens. The infrastructure will not be able to serve the project. A legitimate environmental impact statement would prove that. Tell the developers to keep their cash envelope and reject the zoning change

Commenter 22: **Robert McFeely, written submission dated November 15, 2020.**

I am against the high rise zoning change city planning is trying to implement in St George. We do not have the infrastructure to handle the traffic sewage and volume of a high rise

Commenter 23: **Barbara Wetmore, written submission dated November 17, 2020.**

PLEASE STOP REZONING IN ST GEORGE (Staten Island). We have had enough. The Island is overwhelmed with limited roads. Soon there will be more speed light cameras than cars!

Commenter 24: **Tracy Schulman, written submission dated November 16, 2020.**

As a Staten Island resident I want to voice my very strong opinion AGAINST the plan to bring R-7 zoning to Staten Island. We do not want these two towers in St. George. This is not a Boro of tall buildings. We do not have the road or infrastructure to support this. The planning commission needs to work with our Elected Officials and not support projects and zoning changes that are not in the best interest of Staten Islanders.

Thank you,

Tracy Schulman

Commenter 25: **Richard Ricco, written submission dated November 16, 2020.**

DO NOT bring R-7 zoning to Staten Island, DO NOT build two towers in St. George - a 26-story and one 25 stories. As a Staten Islander I don't want to see this.

Commenter 26: James Ferreri, written submission dated November 16, 2020.

The last thing that St. George, Staten Island needs are skyscraping towers in an area already burdened with a failure of a ball field, a failed giant 'Wheel' and outlet stores that draw no customers. How about we stop with the giant plans and think about hard-working, taxpaying Staten Islanders and build sensible stores and housing to reinvigorate this area once and for all. So far, the ideas have been disasters.

Commenter 27: Lisa, written submission dated November 16, 2020.

I live in Staten Island and am opposed to allowing apartment buildings being built in st George.

Commenter 28: Sean Caffrey, written submission dated November 15, 2020.

Please stop the building of high risers, condos, townhouses etc! Stop building housing and start giving Staten Island Transportation! It's ridiculous and insane! Please HELP STATEN ISLAND!

Commenter 29: Susan Pulice, written submission dated November 15, 2020.

Please do not build high rise buildings in St. George or anywhere in Staten Island!!

Comment 29: Anjail Ameen-Rice, written submission dated November 15, 2020.

Do not bring R-7 zoning to Staten Island. They want to build two towers in St. George, Staten Island - a 26-story and one 25 stories. "Enough" of ignoring what Staten Islanders want for Staten Island, and stop trying to force feed us their idea of what we should be.

Commenter 30: Maria Zaharakis, written submission dated November 17, 2020.

NO, NOT Staten Island AGAIN, NOT NOW, NOT EVER !!!!

Commenter 31: Susan Roszak, written submission dated November 15, 2020.

To city planning

NO stop. No R-7 zoning in Staten Island. We cant handle the infrastructure for two towers in St. George - a 26-story and one 25 stories. No more high rise apartment buildings

Commenter 32: Gary D'Amato, written submission dated November 17, 2020.

Do not allow the re-zoning of St George to allow for any high rise construction. There has been enough overbuilding here since the bridge went up. Please turn down the developer's plan for two 26 story towers.

Commenter 33: Dorothy McNamara, written submission dated November 18, 2020.

I am against rezoning in the St. George area. We do not need or want skyscrapers here. Any reinvestment in the area or other areas on Staten Island should have a broad base of community input.

Commenter 34: Michelle Ryan, written submission dated November 15, 2020.

Please do not build high rise on Staten Island. Our infrastructure and our schools cannot handle it. Use that money to connect the Richmond parkway, and extend fr cappadanno past new drop lane. Especially now that the bus lane was extended. It turns Hylan Blvd into a parking lot.

Commenter 35: John Taglialatela, written submission dated November 18, 2020.

I worked here for over 30 years. I moved here from Brooklyn 3 years ago. Staten Island is severely underserved by the City and State. Medical care is severely lacking. Mental health and drug addiction care is the poorest in the city. We are the only borough without a city hospital. More than half the hospitals on the island either closed or were sold. Mass transit on the island is disgusting. For years Jerseyites drove over the VZ bridge to Manhattan then left Manhattan through the tunnels for free while we pay the highest tolls in the country. There should be a toll on all roadways coming off the New Jersey bridges. It could be used to enhance buses into the city. Staten Island is the only borough that gives away land. It's given millions of dollars of the Seaview Farm Colony away. Staten Island has allowed building everywhere. Thousands of connected homes everywhere. The city is killing us with summonses. I haven't heard anyone demand it ! stops. The local politicians do little to stop it. There's no reason our politicians aren't in all the major papers. I sometimes feel our politicians approve of what's going on and the little they protest is just a smokescreen. We need to work harder to fight for what we deserve.

Commenter 36: Betula, written submission dated November 16, 2020.

We don't want out of zone high risers in our island. The traffic is already bad and we don't have connection to subways. More people more congestion.

Commenter 37: Heather, written submission dated November 15, 2020.

Please, no multi storied buildings on Staten Island! We don't want our sight lines to the city blocked, and we certainly don't need more traffic or crowding. This borough is unique with its beaches and green spaces, and the residents want to keep it this way - stop building!

Commenter 38: Eddie Bernard, written submission dated November 16, 2020.

To the Department of City Planning: We would like to inform you that we are opposed to bringing R-7 zoning to Staten Island. We opposed building two towers in St. George - a 26-story and one 25 stories. We already have a lot of problems commuting to NYC besides paying ridiculous tolls. You better build first a subway tunnel from St. George Ferry Terminal to lower Manhattan.

Commenter 39: Philita Wondolowski, written submission dated November 15, 2020.

City Planning, I say "No" and "Enough" of your agency ignoring what Staten Islanders want for Staten Island, and stop trying to force feed us your idea of what Staten Island should be.

We do NOT need two towers or anything else that makes us something we are not. STOP!!

Commenter 40: Peggy Abbaticchio, written submission dated November 17, 2020.

Please leave Staten Island along. We don't need nor want Hi-risers in this Boro.

Peggy Abbaticchio

Commenter 41: Carl Hilton, written submission dated November 16, 2020.

We do not want R-7 zoning on Staten Island.Please do not destroy the Islands character.

Commenter 42: Mx. Joe-Anthony Sierra, written submission dated November 18, 2020.

We/I oppose the ReZoning period without ULURP Community Board approval ETC I cote TwoBridges Manhattan NYCCouncil opposed the heights of REBNY proposed (mayoral?) rezoning sign off and after years of litigation they won and lost in appeals. Stop paying REBNY to build here I cite Hudson Yards Manhattan 6 billion total city investment 400 million tax incentives to build on a bridge. The reason I advocate NY legislators from accepting the Real Estate Board of NY campaign funds. It's enough with the Bay Street corridor I oppose them from removing Western Beef supermarket without relocating new build leaves the poor without grocery store. Want planning how about restoring taten Island railroad that already exist to get Amazon employees & Mariner's Harbor etc residents option of transit from overcrowded buses Thank you sincerely Mx. Joe-Anthony Sierra

Commenter 43: Patrick Raftery, written submission dated November 17, 2020.

Dear Madam or Sir,

I am writing to you to express my displeasure with the plan to bring R-7 zoning to Staten Island. No doubt you've heard the litany of concerns from my fellow islanders: how overdevelopment has choked our island's already over-taxed infrastructure and substantially hurt our quality of life, with too much traffic, too few public transportation options, and an overall sense that the City of New York cares little what the people who actually call the island home think or feel. So I implore you, as a proud native Staten Islander, to reconsider this proposal and to listen to the voices of the people it will impact, and say no to this plan.

Thank you for your time.

Patrick Raftery

Commenter 44: John Magnuski, written submission dated November 18, 2020.

I am opposed to the building of the Liberty Towers at 8 - 26 Stuyvesant Place & 110 - 208 Richmond Terrace. The building of these buildings will bring more congestion to an already congested area. The builders want to create 750 apartments with 366 parking spots. That is a spot for half of the apartments. If more then half the occupants have a car, where will they park? This area of is one of the most congested on Staten Island. The Special Hillsides Preservation District and the Special St. George District, were created to keep this kind of development from happening for a reason, overcrowding in this area. Why would the city create these districts and then not enforce them? Please reject this proposal, it is too large of a project for the St George area.

Commenter 45: John Molinari, written submission dated November 18, 2020.

We cannot allow City Planning to align with a developer to bring R-7 zoning to Staten Island. The city wants to build two towers in St. George -- a 26-story tower and a 25-story tower. St George and the ferry area is very crowded already, and the busses and trains in the vicinity are pushed to capacity. Building these towers would congest the surrounding area. Staten Island does not have a city hospital, thus, the city should not have the power to move forward with this project. GIVE US A HOSPITAL FIRST, LIKE EVERY OTHER BOROUGH!

Commenter 46: Joanna Fredericks, written submission dated November 17, 2020.

A 26-story tower is totally out of character for the St. George neighborhood and Staten Island as a whole. The area is already densely populated and the infrastructure to support such a tower is non-existent.

Commenter 47: Kathleen Baldassano, written submission dated November 17, 2020.

I wish to oppose R-7 zoning for St. George, Staten Island. That neighborhood is already overcrowded and no one can find any street parking (I know because I have searched for parking for hours when visiting my daughter who lives on St. Marks Place.) Between Curtis HS, ferry commuters, the various State Courts and jurors, the existing large apartment buildings, the large 120 NYPD Precinct and the many restaurants and shops -there are TOO MANY PEOPLE already filling St. George every day! Why would anyone think it's a good idea to build two towers in St. George (a 26-story tower and a 25-story tower)? There is not enough sidewalk space, sewer capacity, and available parking for the addition of that many people in the St. George neighborhood. Imagine the traffic gridlock on Richmond Terrace! Even if the proposed towers offer free off-street parking to tenants, that will not alleviate the traffic gridlock (and we know every tower tenant will own at least one car since you cannot live on Staten Island without a car due to the lack of sufficient public transportation.) PLEASE DO NOT REZONE ST. GEORGE FOR R-7 CONSTRUCTION. Thank you.

Commenter 48: Debra Barone, written submission dated November 16, 2020.

No towers. We the people of SI have a right to refuse these towers

Commenter 49: Ranti Ogunleye, written submission dated November 30, 2020.

I am opposed to the proposed project to build Liberty Towers in St. George under its current framework. We need equitable development in St. George and in our waterfront communities along the North Shore, and the proposed project does not come close to meeting that standard. Out of 750 potential units, only 225 of these units are marked affordable, about 30%. This is unacceptable in a borough, and city for that matter, that has seen months of job loss, stagnant or reduced wages, and rising costs of living for working families. When I talk to these families, affordable housing, or the lack thereof is one the issues that is most on their minds.

The current threshold enacted by the City Council of 20% of units in new developments being affordable does little to help the people who need housing to be truly just that: affordable. This threshold should be raised to at least 50%. Much of the conversation about this project has been about the size of the building, and the rezoning needs that would come with this project. Those concerns are valid and need to be examined further.

If this project is approved, it would demonstrate, yet again, that the needs of developers have been placed above the needs of working people in St. George. Affordable housing for those who need it most in our borough cannot continue to be done in back rooms and board rooms, with the interests of the community last of the priorities. This is why a comprehensive public review process must take place, and officials in public office must ensure that going forward, the interests of St. George residents are considered at the very beginning of this process.

Commenter 50: Mary Ward, written submission dated November 17, 2020.

I do not want anybody to build those monster buildings in st George or anywhere else on Staten Island. its getting too crowded now and they are ruining our island SO STOP THE BUILDING

Commenter 51: John Grassadonio, written submission dated November 18, 2020.

It is time for you to listen to the local elected leaders and people of Staten Island. We unequivocally do not want R-7 zoning here. Instead of trying to cram more people on the island, invest in the island's infrastructure. It's time the bureaucrats stop shoving their agendas down everyone's throats and listen to what the overwhelming majority of people want, instead of listening to the few. Why is it that you think the government can willfully choose to ignore the wants of the people? You will argue that this is for the sake of progress - what you do not see is that progress such as this will ultimately further lead to the boroughs demise. Staten Island is far too overdeveloped with one and two family homes, let alone adding 25 + story apartments. We don't want it, we don't need it!! I support Borough President Oddo, and urge you to work with him to stop tear downs, and end the bid for high density zoning here.

Commenter 52: Michael Butler, written submission dated November 15, 2020.

I am strongly opposed to the proposed R-7 zoning on Staten Island in the neighborhood of St. George. Local infrastructure cannot support any further population increase without serious declining the quality of life for current residents of the area.

Commenter 53: R.B., written submission dated November 30, 2020.

Although it seems there's a big push by our local officials here in Staten Island not to modify zoning requirements to build high-rises in St. George-

I am a lifelong resident of these neighborhoods and believe we need an updated skyline - a skyline of our own. Many local community members agree who I am in contact with, including my family. I hope to see some beautiful buildings when I come in on the ferry or as I am driving on the Gowanus Expressway.

Also, I truly believe that invested interest in our north shore is really the only way there will be further interest in developing and updating our public transportation systems - which is so desperately needed.

Commenter 54: Lee Anderson, written submission dated November 17, 2020.

We do not want R-7 Zoning in Staten Island. Do not allow this to happen.

Commenter 55: Claudia Toback, written submission dated November 17, 2020.

St. George resident speaks out against the proposed Liberty Towers!

Enough already with skyscraper style housing on Staten Island. Castleton Towers on St Marks Place dominate the Island's skyline and now two more are proposed just north of them on Richmond Terrace, Stuyvesant Place and Hamilton Avenue. The area is saturated already with large scale developments, changing the character of the St. George/New Brighton Historic District. And of course this development will add traffic to Richmond Terrace that really cannot support it.

The original owner of the site quickly placed foundations in the lot to protect the investment and then abandoned it. It became a neighborhood eyesore until Casandra Properties enclosed it in fencing. The original intent for this lot should be preserved.

WHY is NYC permitting a zoning change when the zoning map shows it is designated as R-6?

Commenter 56: Michael Morrell, written submission dated November 15, 2020.

I adamantly oppose the implementation of an R-7 zone in the St. George section of Staten Island. This type of development ignores the reality of the limitations of Staten Island's infrastructure.

Commenter 57: Yan Lindvor, written submission dated November 17, 2020.

do not bring R-7 zoning to Staten Island!

Commenter 58: Elise Crumbley, written submission dated November 16, 2020.

I oppose the proposed sky scraper addition on Bay Street, Staten Island NY.

Commenter 59: Benjamin Donsky, written submission dated November 18, 2020.

Hi,

I am writing in support of the proposed development application for high-rise residential towers in St George. I am in favor of introducing r7 zoning at this and similarly appropriate locations.

I am a Staten Island resident and concerned with the affordability of housing, so I would like this project to go forward.

Thank you.

Commenter 60: Suzette Toal, written submission dated November 17, 2020.

There is no logical thought process used to re-zoning pasts of SI.

We have empty apts , empty store fronts, now empty restaurants. We have much too much traffic here now. Please stop the re- zoning which is in favor of builders and corporations. Help the people.

Commenter 61: Adriano Chinellato, written submission dated November 24, 2020.

No R-7 zoning on Staten Island !!! This is an actual example of government willfully choosing to ignore what Staten Island wants ! It's time City Planning listen to us, Staten Island residents, and stop this ongoing conspiring with developers. We say no to high rise apartments buildings. We have chosen to live and raise our children in the " green borough " for a reason: quality of life. City Planning however wants to change that to accommodate demands from wealthy developers who can care less about us. All they want is profiting by taking away our waterfronts, lands, spaces and build, build, build...bigger , bigger, bigger...higher, higher higher . No, this has to stop, now!

This borough is already overpopulated.

Thanks

Commenter 62: Robert Stern, written submission dated November 17, 2020.

Olga, do not allow R7 zoning on Staten Island! Are you crazy 20 plus story buildings where the roads are 1 or 2 lanes! No parking, no infrastructure in place etc.

I've been a Staten Islander for 59 years and know our community better then 99% of government employees or elected officials.

Thank you,

Robert Stern

Commenter 63: Karen Palmeri, written submission dated November 15, 2020.

To N.Y.C. planning,

I'm writing to voice my strong opposition to building two 25 and 26 foot buildings on Staten Island. Staten Island does not have the infrastructure to accommodate these high rises! Enough is enough with the building.

Commenter 64: Linda Cohen, written submission dated November 30, 2020.

Regarding River North scoping, please include the following items:

1. Sewage - Please provide analysis on how this project will impact our waterways and outdated Port Richmond Treatment Plant which currently discharges millions of gallons of raw sewage into the Kill Van Kull. How will stormwater and sewage be affected/contained by this project?

   (https://ny.curbed.com/2020/2/20/21144943/new-york-water-combined-seweroverflow-dep-plan)

2. Open space - Please provide analysis of current green open space acreage in the area and how the open space that this project will provide moves us towards (or away from) the open space goals of New Yorkers 4 Parks.

(http://www.ny4p.org/news/release-open-space-in-three-borough-neighborhoods-falls-short-of-key-goalsin-new-reports)

3. Please provide analysis on sunlight and shadows on neighboring buildings and streets created by the project.

4. Neighborhood character - The Castleton Park apartments are unusual in this area, in height and bulk. Please provide history of zoning change initiations including R 6 and Special Hillsides Preservation District for this area. DCP has recently published preliminary recommendations for changes for slopes and trees in SHPD. How does this project fit in?

Thank you,

Linda Cohen

10301

Commenter 65: Phil Marius, oral statement delivered at public scoping meeting.

Thank you so much Olga. I am Phil Marius. My interest in this conversation as a resident of Stapleton, who like many others artists and musicians are struggling to find affordable housing within the immediate vicinity of the North Shore - close, to family, friends, our networks, our places of work. And as a candidate for city council - whose duty and

responsibilities to comment and take a position on projects like these - and I want to thank the officials representatives at City Planning and the applicant and their representatives for allowing us this opportunity to register our position and our suggested ways in which the proposal can improve. On my end I believe that the mandatory inclusionary housing option 2 that is being proposed for this project does not go far enough on two fronts. The first of which is not enough units are being proposed for affordability. And the second is of those units that are being proposed for affordability, those units are not going for folks who are making the least amount of money. Minimum wage in the community. $15 an hour, $28,000 a year. And I think an improvement would be - and I hope that the applicants would also see this as an improvement - would be to increase the number of units that would be leased for affordability and for those units to be affordable for folks making $28,000 a year. I'm closer to that as opposed to $63,000 a year, which is what is being proposed as part of Option 2. And in terms of ideal, I think the best solution would be bare minimum definition of fairness and justice - half and half. 50 percent market-rate, you take it. But give us our cut, 50 percent affordability. And I think towards that end, Mandatory Inclusionary Housing Option 1 would get us closer to that ideal because it it's the units affordable for folks making much closer to the minimum wage and it allows room for the applicant to increase the stock of affordable units in this project. So in conclusion, I write as a resident of Stapleton who’s trying to find affordable housing for his family and as a potential candidate for City Council, whose duties and full-time occupation would be to comment and take a position on such projects.

APPENDIX B – TRANSCRIPT OF ORAL COMMENTS ON DRAFT SCOPE OF WORK

Olga Abinader

All right, let's start with the participants who have registered online to join us to speak. Our first speaker is Linda Dionto followed by John Macbeth. Linda Dionto you're on. Please unmute yourself and we will be able to hear your testimony.

Linda Dionto

Hi.

Olga Abinader

Hello Linda Dionto, we are able to hear you and you are now live. Your three minutes are about to begin.

Linda Dionto

Okay, thank you so much for having me speak. My name is Linda Dionto, and I am the Executive Director of the National Lighthouse Museum. Our organization is dedicated to the full development of the National Lighthouse Museum on the site of the U.S. lighthouse service general depot, on Staten Island from 1864 to 1939. Partnering with government agencies, non-profits, corporations, foundations, and other organizations, we will work to promote and support historical, educational, cultural, recreational, and other related activities at this site while maintaining the navigational significance and maritime heritage of lighthouses throughout the world. Please note our site is called Lighthouse Point and it's about 5 minutes from the Staten Island Ferry, walking over. I am writing - and speaking, actually - I'm speaking today to express my support from Madison Realty Capital's Liberty Towers proposal. This proposed development will increase visitation and local spending for the small businesses and cultural institutions in the neighborhood that have contributed to its charming and vibrant character for years. Liberty Towers site is located steps away from several means of transportation to and around the borough, including the St. George Ferry Terminal, Staten Island Railroad, and a dozen bus lines. This makes

the site prime for visitation from a wide swath of potential patrons. The additional residential units, retail, and approximately 8,000-square-foot public plaza in this proposal will add to the neighborhood's existing draw, and create a new means for street front activation. It is for these reasons that I support Madison Realty Capital's Liberty Towers proposal, and thank you so much for your time and consideration.

Olga Abinader

Thank you so much for your comments. Our next speaker is John Macbeth. John Macbeth followed by Alex Malaccio. John Macbeth you are live and we hope that you can unmute yourself now.

John Macbeth

Yeah I did, I am not making comments at this time. Thank you.

Olga Abinader

Thank you so much for participating today. We will move on to our next speaker. Our next speaker is Alex Malaccio. Alex Malaccio followed by Phil Marius.

Alex Malaccio

Hi. Also not making comments. Thank you.

Olga Abinader

Ok, thank you Mr. Malaccio. Our next speaker is Phil Marius. Phil Marius.

Phil Marius

Yes, good afternoon.

Olga Abinader

Good afternoon.

Phil Marius

Thank you so much. So, I presume this is the proper meeting where one can make a comment about affordability since the socioeconomic conditions will be a part of the review.

Olga Abinader

Yes sir.

Phil Marius

Thank you so much Olga. I am Phil Marius. My interest in this conversation as a resident of Stapleton, who like many others artists and musicians are struggling to find affordable housing within the immediate vicinity of the North Shore - close, to family, friends, our networks, our places of work. And as a candidate for city council - whose duty and responsibilities to comment and take a position on projects like these - and I want to thank the officials representatives at City Planning and the applicant and their representatives for allowing us this opportunity to register our position and our suggested ways in which the proposal can improve. On my end I believe that the mandatory inclusionary housing

option 2 that is being proposed for this project does not go far enough on two fronts. The first of which is not enough units are being proposed for affordability. And the second is of those units that are being proposed for affordability, those units are not going for folks who are making the least amount of money. Minimum wage in the community. $15 an hour, $28,000 a year. And I think an improvement would be - and I hope that the applicants would also see this as an improvement - would be to increase the number of units that would be leased for affordability and for those units to be affordable for folks making $28,000 a year. I'm closer to that as opposed to $63,000 a year, which is what is being proposed as part of Option 2. And in terms of ideal, I think the best solution would be bare minimum definition of fairness and justice - half and half. 50% market-rate, you take it. But give us our cut, 50% affordability. And I think towards that end, Mandatory Inclusionary Housing Option 1 would get us closer to that ideal because it it's the units affordable for folks making much closer to the minimum wage and it allows room for the applicant to increase the stock of affordable units in this project. So in conclusion, I write as a resident of Stapleton who's trying to find affordable housing for his family and as a potential candidate for City Council, whose duties and full-time occupation would be to comment and take a position on such projects.

Olga Abinader

Thank you so much for your comments. We'll now move on to participant number 5. Cesar Claro, followed by number 6, Maria Free. Cesar Claro, we are ready for you. Please unmute yourself.

Cesar Claro

I am here, can you hear me?

Olga Abinader

Yes, we can hear you.

Cesar Claro

Okay so I'm being president and CEO of the Staten Island Economic Development Corporation. I want to thank you for the opportunity to speak on behalf and in support of Madison Capital for this project. I'm not going to speak directly from the testimony that I submitted in writing. I'll just give you some highlights. About two years ago, my staff and I started to meet with off-island affordable housing developers, trying to get their interest into Staten Island. We saw - when we visited Greenpoint, and Williamsburg, and greater Jamaica, and Hunts Point, and other areas - that when significant private investment was made in affordable housing in those neighborhoods, and it included - in some cases, public investment and infrastructure, then of course, open space - that it really transformed a lot of these neighborhoods, and we felt this is what we're looking for. Not just in St. George, but throughout the North Shore of Staten Island. We probably met with about 35 to 45 different affordable housing developers in Manhattan, Brooklyn, and Queens. And none of them were interested in coming to Staten Island. And they all had the same complaints: bad zoning; no real leadership on the affordable housing in the affordable housing arena; lack of community support and so on. But then we came across the team from Madison who not only is interested but had a piece of property and had a vision and a great project on the table. It presented to our board of directors who loved the project, and really that kind of leads to the other reasons why we're supporting it. I think everyone

needs to come to terms with the fact that there just aren't enough people living in St. George to keep that neighborhood economically viable. For those of us that live or work there or ask through, we know that after 5:00 p.m. the neighborhood does die down. There isn't much traffic or participation. We have a big hole in the ground that's supposed to be The Wheel. Empire Outlets, which is a retail complex - which is struggling, to say the least - to fill the space. A ballpark that's probably going to go out of business soon. And, you know, all those struggles relate back to the fact there just aren't enough people living and congregating and participating in things in St. George. We think this project start of that movement. And, you know, the last point I'll make, I went into more detail in my testimony is - we've tried everything else down there now. We've tried family recreation. We've tried retail. Industrial is is pretty much out of the question. I think it's worth it for us to really go back to the formula that worked in Williamsburg and Greenpoint and all those other neighborhoods that I mentioned earlier. Let's start with some good housing and some private investment. Thank you.

Olga Abinader

Thank you. Our next speaker - excuse me for one moment. Let me just double check to make sure I have the right information from our team. Our next speaker is Maria Lee. Excuse me, Maria Free. Followed by Leticia Remauro. Maria Free. Follow by Leticia Remauro. Maria, we are now live and awaiting your testimony.

Maria Free

Great. Good afternoon and thank you for letting me speak. My name is Maria Free and I am the urban planning and policy analyst for the New York Building Congress. The Building Congress is proud to support Madison Realty's proposal for River North, and we're excited to see the project move through environmental review. The New York Building Congress has - for almost 100 years - advocated for investment and infrastructure, for job creation, and promoted preservation and growth in the New York City area. Our association is made up of over 550 organizations comprised of more than 250,000 professionals. In alignment with our mission, the Building Congress believes River North will support the economic renaissance that has been taking place in St. George. The site with the proposed zoning amendments will become a northern anchor for the commercial corridor of Stuyvesant Place. And by adding affordable housing, retail, public open spaces near the St. George Transit hub, River North advances the City's goals set forth in OneNYC, Housing New York, and North Shore 2030. The project will have 225 affordable housing units, making it one of the borough's largest sources of affordable housing, as well as 50,000 square feet of landscape and natural open space. The proposed site plan also retains views from upland areas and enhances access to the waterfront for both residents and visitors. River North would transform an underused site into an important piece of St. George's vibrant urban fabric and the Building Congress looks forward to the proposal becoming a reality. Thank you.

Olga Abinader

Thank you for your comments. Our next speaker is speaker number 7, and that's Leticia Remauro. Leticia Remauro.

Leticia Remauro

How are you Olga? And to all thank you.

Olga Abinader

I'm doing well.

Leticia Romero

Good. Thank you for allowing me to testify. I'm Secretary for the Staten Island Downtown Alliance, which is the local LDC that covers Rosebank, Clifton, Stapleton, Tompkinsville, St. George. And the Staten Island Downtown Alliance supports Madison Realty Capital's River North Liberty Towers project because it will provide an opportunity for Staten Island young married couples, seniors, and young professionals who are increasingly seeking vertical rental living in a suburban setting to remain a part of their community, Staten Island, rather than leaving for New Jersey and communities south. Similar to the Pier 21 development project approved by Community Board 1, Borough President, City Council, and City Planning in 2017, River North Liberty Towers offers rent units in close proximity to public transportation, and stunning waterfront views. Similar to Battery Park City, Tribeca, and Urby, River North Liberty Towers offers majority market-rate rent rentals with the percentage of workforce-rate units suitable for Staten Island retirees and young people whose income is limited. It is the type of project that will provide much-needed density in an area that Curbed New York has called one of the hot new neighborhoods in New York City. In essence, Liberty, this project actually fits into the landscape of the North Shore. If you take a look at it, it is surrounded, or on the back end anyway, tall buildings because St. George is a walkable neighborhood. It is a neighborhood that young people and older people who want to rent instead of own like to gather in. It is close to everything. It's close to theaters. It's close to shopping. And thankfully once projects like this were coming on the drawing boards, such as the Lighthouse Point and also Urby and also a myriad of other - The Rail and The Accolades - once we started developing these types, or putting these plans on the table, amenities started to come to a neighborhood that had long not had amenities. And so now, in order to support these amenities, we have to move forward because this project is right for this area. The rest of Staten Island is single-family homes, but this project would be surrounded by other apartment buildings, other condos, other tall buildings. And, at the end of the day, what we want to do is we want to retain our Staten Island community here. We don't want to tell them that they can't live here if they don't want to own a home. So, it is very much in context with the neighborhood and it is much more beneficial to the community than the homeless shelter that's being planned right now from Victory Boulevard and Bay Street. And when we adopt, you know, projects like this that belong in the landscape, then we will have no need for homeless shelters because we'll be creating apartments for young people to live in. And that's what we want on Staten Island, especially in the North Shore, where we work so hard to create a comprehensive plan of very balanced, you know, economic income and a way of living that is very walkable. So we urge everyone to please approval this project from the City Planning on to the City Council, to the Borough President, and to the Community Board. It's just exactly what St. George needs at this time.

Olga Abinader

Thank you so much for your comments and your testimony today. We really appreciate it. All right, I'm looking at my queue and it appears that we don't have any additional speakers who have signed up to speak at this time. I will note that at this time it is 3:30

p.m., and we are going to take an approximately 5-minute pause until 3:35 p.m. to allow any members of the public who would like to join to speak to complete their online registration process before we close the meeting. So once again we're going to take a brief pause. We will return in 5 minutes at 3:35 p.m. to see if any additional members of the public would like to provide testimony at this scoping meeting. Thank you all and see you in five minutes.

Hello everyone. Welcome back you are tuning into the remote public scoping meeting for the River North project, formerly known as Liberty Towers. The CEQR number is 20DCP140R, my name is Olga Abinader and I am the Director of EARD. I'll note that we are in part 3 of the general scoping meeting, where members of the public are allowed to provide testimony for up to three minutes. Just give us a moment to see if anyone has joined us either online or otherwise. Okay does look like we have not received any additional participants at this time so therefore it appears that we will be closing our public scope and meeting very shortly. For those of you who may have experienced technical difficulties providing testimony today please recall that you are able to submit written testimony online by selecting this public meeting information on the NYC engage portal at www.nyc.gov/nycengage or also through the Department of City planning's website scoping meeting page or also by emailing or mailing your comments to the Department of City Planning. The contact information that is available if you'd like to mail your written comments is New York City Department of City Planning attention Olga Abinader 120 Broadway 31st floor New York, New York 10271 or if you'd like to send your comments over written email the email address is 20DCP140R_DL@planning.nyc.gov. I see that we have a minor typo on our screen there I will note also that the deadline for submitting written comments is Monday November 30th 2020 it is currently 3:38 p.m. and today's public scoping meeting is now closed thank you all for joining us.