

Bally's Bronx
Waterfront Revitalization Program Consistency Assessment

LANGAN

FOR INTERNAL USE ONLY	WRP No. _____
Date Received: _____	DOS No. _____

NEW YORK CITY WATERFRONT REVITALIZATION PROGRAM
Consistency Assessment Form

Proposed actions that are subject to CEQR, ULURP or other local, state or federal discretionary review procedures, and that are within New York City's Coastal Zone, must be reviewed and assessed for their consistency with the *New York City Waterfront Revitalization Program (WRP)* which has been approved as part of the State's Coastal Management Program.

This form is intended to assist an applicant in certifying that the proposed activity is consistent with the WRP. It should be completed when the local, state, or federal application is prepared. The completed form and accompanying information will be used by the New York State Department of State, the New York City Department of City Planning, or other city or state agencies in their review of the applicant's certification of consistency.

A. APPLICANT INFORMATION

Name of Applicant: Bally's New York Operating Company, LLC

Name of Applicant Representative: Max Stember-Young, Langan Engineering and Environmental Services

Address: 360 West 31st Street, 8th Floor

Telephone: 212-479-5594 Email: mstemberyoung@langan.com

Project site owner (if different than above): _____

B. PROPOSED ACTIVITY

If more space is needed, include as an attachment.

1. Brief description of activity

The Applicant, Bally's New York Operating Company, LLC, seeks a series of discretionary land use actions to facilitate the "Bally's Bronx" gaming and recreation facility (the "Proposed Facility") in the Throggs Neck neighborhood of Bronx Community 10. The Proposed Facility would contain gaming space with food and beverage services, a hotel, an event center, retail, and a parking garage located on an approximately 18-acre parcel (the "Development Site") within Bally's Golf Links at Ferry Point, a 222-acre public golf course in the Bronx (the "Golf Course"). An approximately 40,160-gross-square-foot (gsf) replacement Golf Course clubhouse (the "golf clubhouse") would also be constructed.

The Golf Course is a part of Ferry Point Park (the "Park"). The Applicant has operated the Golf Course since September 2023 pursuant to a license agreement with the New York City Department of Parks and Recreation (NYC Parks) and intends to construct the Proposed Facility within a portion of the Golf Course that is currently used for parking, the golf clubhouse, and a portion of the practice area.

In connection with the Proposed Facility, the uninterrupted circular roadway within the Park that connects the southbound and northbound Hutchinson River Expressway service roads (the "Ring Road") would be widened and improved as a City street. Collectively, the Development Site and the Ring Road comprise the" Affected Area." The Proposed Facility, replacement golf clubhouse, and improvements to Ring Road comprise the "Proposed Development."

2. Purpose of activity

The Proposed Actions would enable a destination gaming facility in an area of the Bronx that is well suited to accommodate it. The site is strategically located in proximity to interstate highways and regional airports, but its location within a park offers a degree of separation from the adjacent community for minimal neighborhood affect. The Development Site will be located on the existing golf course parking lot and clubhouse, allowing the majority of the golf course (over 200 acres) to remain intact and open to the public.

Importantly, the Proposed Development will generate meaningful economic activity for the Borough, City and State, including significant new tax revenue. The project is expected to create temporary construction jobs and 3,500 permanent jobs. When complete, the project would be one the largest Bronx employers and one of the largest privately funded projects in Bronx's history.

The project will further goals in the 2015 Hutchinson River Transportation Corridor Parkway Study by making privately-funded infrastructure and safety improvements to Ring Road and surrounding roadways. The study recommended mapping Ring Road as a City street, as well as improving connectivity to the Park. In partnership with New York City, these important transportation objectives will be implemented with the Proposed Development. Additionally, improvements to Park facilities which will complement the City's recent park upgrades, including the newly created waterfront access and ferry terminal, we be included as a part of the Proposed Development.

The Proposed Development would be an economic boon to the City of New York, significantly increase employment in the area both directly and indirectly, and create a vibrant destination in a largely underutilized area of the Bronx.

C. PROJECT LOCATION

Borough: Bronx Tax Block/Lot(s): 5622, p/o Lot 1

Street Address: 450 Hutchinson River Parkway

Name of water body (if located on the waterfront): East River and Westchester Creek

D. REQUIRED ACTIONS OR APPROVALS

Check all that apply.

City Actions/Approvals/Funding

City Planning Commission ☑ Yes ☐ No

- ☑ City Map Amendment
- ☑ Zoning Map Amendment
- ☐ Zoning Text Amendment
- ☐ Site Selection – Public Facility
- ☐ Housing Plan & Project
- ☐ Special Permit
  (if appropriate, specify type: ☐ Modification ☐ Renewal ☐ other) Expiration Date: _____
- ☐ Zoning Certification
- ☐ Zoning Authorizations
- ☑ Acquisition – Real Property
- ☑ Disposition – Real Property
- ☑ Other, explain: Public Design Commission approval
- ☐ Concession
- ☐ UDAAP
- ☐ Revocable Consent
- ☐ Franchise

Board of Standards and Appeals ☐ Yes ☑ No

- ☐ Variance (use)
- ☐ Variance (bulk)
- ☐ Special Permit
  (if appropriate, specify type: ☐ Modification ☐ Renewal ☐ other) Expiration Date: _____

Other City Approvals

- ☐ Legislation
- ☐ Rulemaking
- ☐ Construction of Public Facilities
- ☐ 384 (b) (4) Approval
- ☑ Other, explain: Amendment of existing Concession License between Applicant and NYC Parks
- ☐ Funding for Construction, specify: _____
- ☐ Policy or Plan, specify: _____
- ☐ Funding of Program, specify: _____
- ☐ Permits, specify: _____

State Actions/Approvals/Funding

- ☑ State permit or license, specify Agency: NYSDEC,Gaming Commission Permit type and number: parkland alienation, gaming license
- ☐ Funding for Construction, specify: _____
- ☐ Funding of a Program, specify: _____
- ☑ Other, explain: State legislation for parkland alienation

Federal Actions/Approvals/Funding

- ☐ Federal permit or license, specify Agency: _____ Permit type and number: _____
- ☐ Funding for Construction, specify: _____
- ☐ Funding of a Program, specify: _____
- ☐ Other, explain: _____

Is this being reviewed in conjunction with a Joint Application for Permits? ☐ Yes ☑ No

E. LOCATION QUESTIONS

1. Does the project require a waterfront site? ☑ Yes ☐ No
2. Would the action result in a physical alteration to a waterfront site, including land along the shoreline, land under water or coastal waters? ☑ Yes ☐ No
3. Is the project located on publicly owned land or receiving public assistance? ☑ Yes ☐ No
4. Is the project located within a FEMA 1% annual chance floodplain? *(6.2)* ☑ Yes ☐ No
5. Is the project located within a FEMA 0.2% annual chance floodplain? *(6.2)* ☑ Yes ☐ No
6. Is the project located adjacent to or within a special area designation? *See Maps – Part III of the NYC WRP. If so, check appropriate boxes below and evaluate policies noted in parentheses as part of WRP Policy Assessment (Section F).* ☑ Yes ☐ No

- ☐ Significant Maritime and Industrial Area (SMIA) (*2.1*)
- ☑ Special Natural Waterfront Area (SNWA) (*4.1*)
- ☐ Priority Maritime Activity Zone (PMAZ) (*3.5*)
- ☐ Recognized Ecological Complex (REC) (*4.4*)
- ☐ West Shore Ecologically Sensitive Maritime and Industrial Area (ESMIA) (*2.2, 4.2*)

F. WRP POLICY ASSESSMENT

Review the project or action for consistency with the WRP policies. For each policy, check Promote, Hinder *or* Not Applicable (N/A). *For more information about consistency review process and determination, see* ***Part I*** *of the NYC Waterfront Revitalization Program. When assessing each policy, review the full policy language, including all sub-policies, contained within* ***Part II*** *of the WRP. The relevance of each applicable policy may vary depending upon the project type and where it is located (i.e. if it is located within one of the special area designations).*

For those policies checked Promote *or* Hinder, *provide a written statement on a separate page that assesses the effects of the proposed activity on the relevant policies or standards. If the project or action promotes a policy, explain how the action would be consistent with the goals of the policy. If it hinders a policy, consideration should be given toward any practical means of altering or modifying the project to eliminate the hindrance. Policies that would be advanced by the project should be balanced against those that would be hindered by the project. If reasonable modifications to eliminate the hindrance are not possible, consideration should be given as to whether the hindrance is of such a degree as to be substantial, and if so, those adverse effects should be mitigated to the extent practicable.*

		Promote	Hinder	N/A
1	**Support and facilitate commercial and residential redevelopment in areas well-suited to such development.**	☑	☐	☐
1.1	Encourage commercial and residential redevelopment in appropriate Coastal Zone areas.	☑	☐	☐
1.2	Encourage non-industrial development with uses and design features that enliven the waterfront and attract the public.	☑	☐	☐
1.3	Encourage redevelopment in the Coastal Zone where public facilities and infrastructure are adequate or will be developed.	☑	☐	☐
1.4	In areas adjacent to SMIAs, ensure new residential development maximizes compatibility with existing adjacent maritime and industrial uses.	☐	☐	☑
1.5	Integrate consideration of climate change and sea level rise into the planning and design of waterfront residential and commercial development, pursuant to WRP Policy 6.2.	☑	☐	☐

		Promote	Hinder	N/A
2	**Support water-dependent and industrial uses in New York City coastal areas that are well-suited to their continued operation.**	☐	☐	☑
2.1	Promote water-dependent and industrial uses in Significant Maritime and Industrial Areas.	☐	☐	☑
2.2	Encourage a compatible relationship between working waterfront uses, upland development and natural resources within the Ecologically Sensitive Maritime and Industrial Area.	☐	☐	☑
2.3	Encourage working waterfront uses at appropriate sites outside the Significant Maritime and Industrial Areas or Ecologically Sensitive Maritime Industrial Area.	☐	☐	☑
2.4	Provide infrastructure improvements necessary to support working waterfront uses.	☐	☐	☑
2.5	Incorporate consideration of climate change and sea level rise into the planning and design of waterfront industrial development and infrastructure, pursuant to WRP Policy 6.2.	☐	☐	☑
3	**Promote use of New York City's waterways for commercial and recreational boating and water-dependent transportation.**	☐	☐	☑
3.1.	Support and encourage in-water recreational activities in suitable locations.	☐	☐	☑
3.2	Support and encourage recreational, educational and commercial boating in New York City's maritime centers.	☐	☐	☑
3.3	Minimize conflicts between recreational boating and commercial ship operations.	☐	☐	☑
3.4	Minimize impact of commercial and recreational boating activities on the aquatic environment and surrounding land and water uses.	☐	☐	☑
3.5	In Priority Marine Activity Zones, support the ongoing maintenance of maritime infrastructure for water-dependent uses.	☐	☐	☑
4	**Protect and restore the quality and function of ecological systems within the New York City coastal area.**	☑	☐	☐
4.1	Protect and restore the ecological quality and component habitats and resources within the Special Natural Waterfront Areas.	☑	☐	☐
4.2	Protect and restore the ecological quality and component habitats and resources within the Ecologically Sensitive Maritime and Industrial Area.	☐	☐	☑
4.3	Protect designated Significant Coastal Fish and Wildlife Habitats.	☐	☐	☑
4.4	Identify, remediate and restore ecological functions within Recognized Ecological Complexes.	☐	☐	☑
4.5	Protect and restore tidal and freshwater wetlands.	☑	☐	☐
4.6	In addition to wetlands, seek opportunities to create a mosaic of habitats with high ecological value and function that provide environmental and societal benefits. Restoration should strive to incorporate multiple habitat characteristics to achieve the greatest ecological benefit at a single location.	☐	☐	☑
4.7	Protect vulnerable plant, fish and wildlife species, and rare ecological communities. Design and develop land and water uses to maximize their integration or compatibility with the identified ecological community.	☐	☐	☑
4.8	Maintain and protect living aquatic resources.	☐	☐	☑

		Promote	Hinder	N/A
5	**Protect and improve water quality in the New York City coastal area.**	☑	☐	☐
5.1	Manage direct or indirect discharges to waterbodies.	☑	☐	☐
5.2	Protect the quality of New York City's waters by managing activities that generate nonpoint source pollution.	☐	☐	☑
5.3	Protect water quality when excavating or placing fill in navigable waters and in or near marshes, estuaries, tidal marshes, and wetlands.	☐	☐	☑
5.4	Protect the quality and quantity of groundwater, streams, and the sources of water for wetlands.	☑	☐	☐
5.5	Protect and improve water quality through cost-effective grey-infrastructure and in-water ecological strategies.	☑	☐	☐
6	**Minimize loss of life, structures, infrastructure, and natural resources caused by flooding and erosion, and increase resilience to future conditions created by climate change.**	☑	☐	☐
6.1	Minimize losses from flooding and erosion by employing non-structural and structural management measures appropriate to the site, the use of the property to be protected, and the surrounding area.	☑	☐	☐
6.2	Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in *New York City Panel on Climate Change 2015 Report, Chapter 2: Sea Level Rise and Coastal Storms*) into the planning and design of projects in the city's Coastal Zone.	☑	☐	☐
6.3	Direct public funding for flood prevention or erosion control measures to those locations where the investment will yield significant public benefit.	☐	☐	☑
6.4	Protect and preserve non-renewable sources of sand for beach nourishment.	☐	☐	☑
7	**Minimize environmental degradation and negative impacts on public health from solid waste, toxic pollutants, hazardous materials, and industrial materials that may pose risks to the environment and public health and safety.**	☑	☐	☐
7.1	Manage solid waste material, hazardous wastes, toxic pollutants, substances hazardous to the environment, and the unenclosed storage of industrial materials to protect public health, control pollution and prevent degradation of coastal ecosystems.	☑	☐	☐
7.2	Prevent and remediate discharge of petroleum products.	☑	☐	☐
7.3	Transport solid waste and hazardous materials and site solid and hazardous waste facilities in a manner that minimizes potential degradation of coastal resources.	☑	☐	☐
8	**Provide public access to, from, and along New York City's coastal waters.**	☑	☐	☐
8.1	Preserve, protect, maintain, and enhance physical, visual and recreational access to the waterfront.	☑	☐	☐
8.2	Incorporate public access into new public and private development where compatible with proposed land use and coastal location.	☑	☐	☐
8.3	Provide visual access to the waterfront where physically practical.	☑	☐	☐
8.4	Preserve and develop waterfront open space and recreation on publicly owned land at suitable locations.	☑	☐	☐

		Promote	Hinder	N/A
8.5	Preserve the public interest in and use of lands and waters held in public trust by the State and City.	☑	☐	☐
8.6	Design waterfront public spaces to encourage the waterfront's identity and encourage stewardship.	☐	☐	☑
9	**Protect scenic resources that contribute to the visual quality of the New York City coastal area.**	☑	☐	☐
9.1	Protect and improve visual quality associated with New York City's urban context and the historic and working waterfront.	☑	☐	☐
9.2	Protect and enhance scenic values associated with natural resources.	☑	☐	☐
10	**Protect, preserve, and enhance resources significant to the historical, archaeological, architectural, and cultural legacy of the New York City coastal area.**	☐	☐	☑
10.1	Retain and preserve historic resources, and enhance resources significant to the coastal culture of New York City.	☐	☐	☑
10.2	Protect and preserve archaeological resources and artifacts.	☐	☐	☑

G. CERTIFICATION

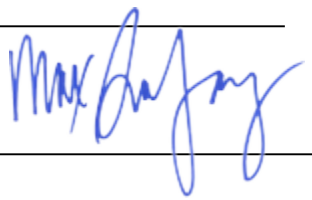
The applicant or agent must certify that the proposed activity is consistent with New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program. If this certification cannot be made, the proposed activity shall not be undertaken. If this certification can be made, complete this Section.

"The proposed activity complies with New York State's approved Coastal Management Program as expressed in New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program, and will be conducted in a manner consistent with such program."

Applicant/Agent's Name: Max Stember-Young

Address: 360 W 31st Street, 8th floor, New York, NY 10001

Telephone: 212-479-5594 Email: mstemberyoung@langan.com

Applicant/Agent's Signature: 

Date: 12/06/24

Submission Requirements

For all actions requiring City Planning Commission approval, materials should be submitted to the Department of City Planning.

For local actions not requiring City Planning Commission review, the applicant or agent shall submit materials to the Lead Agency responsible for environmental review. A copy should also be sent to the Department of City Planning.

For State actions or funding, the Lead Agency responsible for environmental review should transmit its WRP consistency assessment to the Department of City Planning.

For Federal direct actions, funding, or permits applications, including Joint Applicants for Permits, the applicant or agent shall also submit a copy of this completed form along with his/her application to the NYS Department of State Office of Planning and Development and other relevant state and federal agencies. A copy of the application should be provided to the NYC Department of City Planning.

The Department of City Planning is also available for consultation and advisement regarding WRP consistency procedural matters.

New York City Department of City Planning
Waterfront and Open Space Division
120 Broadway, 31st Floor
New York, New York 10271
212-720-3696
wrp@planning.nyc.gov
www.nyc.gov/wrp

New York State Department of State
Office of Planning and Development
Suite 1010
One Commerce Place, 99 Washington Avenue
Albany, New York 12231-0001
518-474-6000
www.dos.ny.gov/opd/programs/consistency

Applicant Checklist

- ☑ Copy of original signed NYC Consistency Assessment Form
- ☑ Attachment with consistency assessment statements for all relevant policies
- ☐ For Joint Applications for Permits, one (1) copy of the complete application package
- ☑ Environmental Review documents
- ☑ Drawings (plans, sections, elevations), surveys, photographs, maps, or other information or materials which would support the certification of consistency and are not included in other documents submitted. All drawings should be clearly labeled and at a scale that is legible.
- ☑ Policy 6.2 Flood Elevation worksheet, if applicable. For guidance on applicability, refer to the WRP Policy 6.2 Guidance document available at www.nyc.gov/wrp

WRP ASSESSMENT

The Applicant, Bally's New York Operating Company, LLC, seeks a series of discretionary land use actions, as described below, to facilitate the "Bally's Bronx" gaming and recreation facility (the "Proposed Facility") in the Throggs Neck neighborhood of Bronx Community District 10. The Proposed Facility would contain gaming space with food and beverage services, a hotel, an event center, retail, and a parking garage located on an approximately 18-acre parcel (the "Development Site") within Bally's Golf Links at Ferry Point, a 222-acre public golf course in the Bronx (the "Golf Course"). An approximately 40,160-gross-square-foot (gsf) replacement Golf Course clubhouse (the "golf clubhouse") would also be constructed. To allow the Proposed Facility, the Applicants propose to rezone the area generally around the Development Site (the "Proposed Rezoning Area").

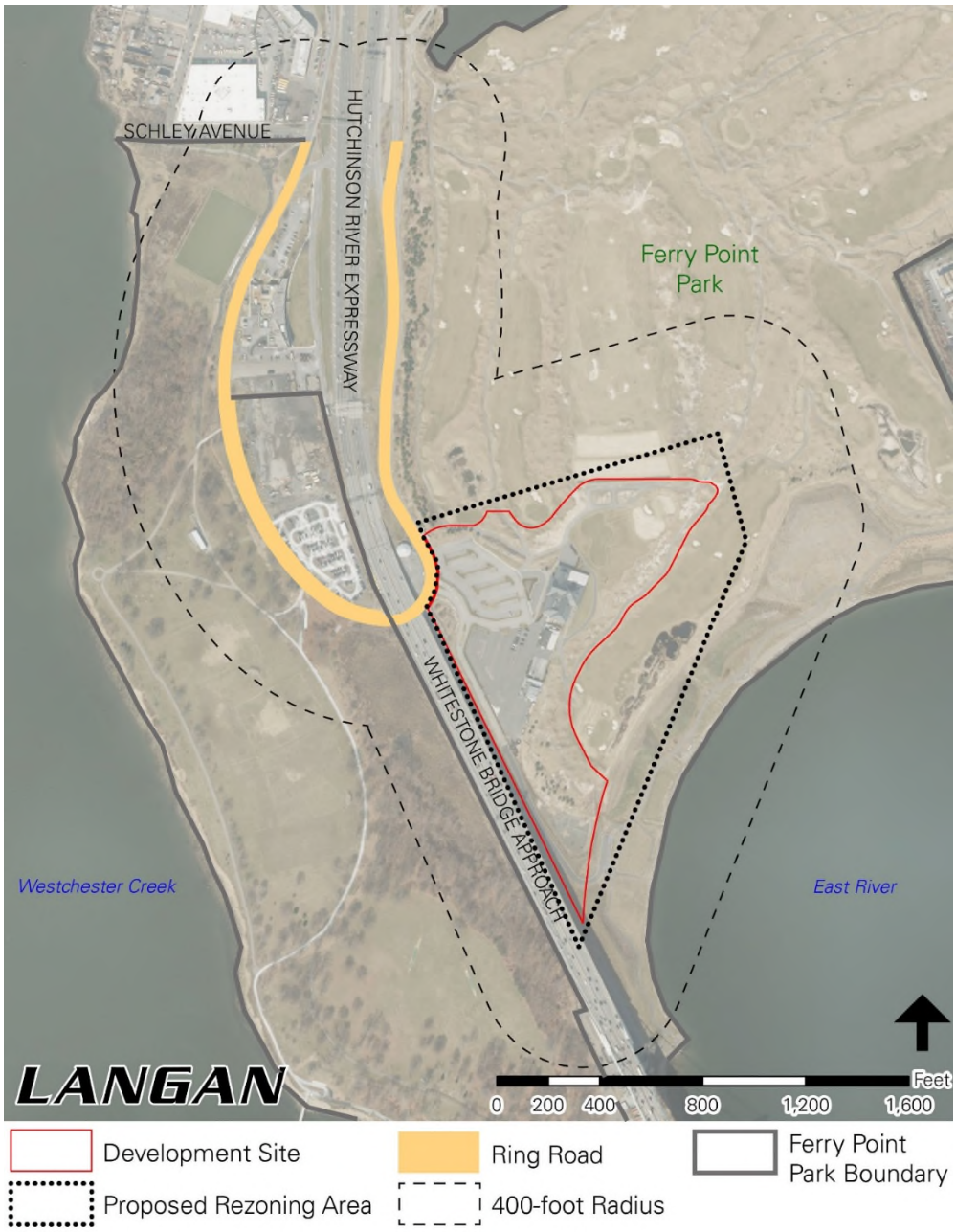
The Golf Course is a part of the larger approximately 413.8-acre Ferry Point Park (the "Park"). The Applicant has operated the Golf Course since September 2023 pursuant to a license agreement with the New York City Department of Parks and Recreation (NYC Parks) and intends to construct the Proposed Facility within a portion of the Golf Course that is currently used for parking, the existing golf clubhouse, landscaping, and a portion of the practice area.

In connection with the Proposed Facility, the uninterrupted circular roadway within the Park that connects the southbound and northbound Hutchinson River Expressway service roads ("Ring Road") would be widened and improved as a City street. Collectively, the Development Site and Ring Road comprise the "Affected Area." The Proposed Facility, replacement golf clubhouse, and improvements to Ring Road comprise the "Proposed Development." Figure 1 shows the Affect Area and a 400-foot radius surrounding the Affected Area.

Ring Road is a NYC Parks roadway and is used by pedestrians, cyclists, and motorists to access and egress the Park. As part of the project, Ring Road would be mapped as a City street and transferred to the New York City Department of Transportation (NYCDOT), as recommended in the *Hutchinson River Parkway Transportation Corridor Study*. Ring Road improvements are expected to include: 1) roadbed widening to accommodate two 11-foot-wide travel lanes and one parking lane, 2) a sidewalk 3) a landscape strip, 4) a two-way protected bike lane, 5) at least two new signalized crossings to assist pedestrians and calm traffic, and 6) new infrastructure to manage stormwater and reduce the potential for flooding. These improvements would create new and safer travel for pedestrians and cyclists by creating a sidewalk and bike lane where none currently exists, as well as new opportunities for connections to existing pedestrian and cycling facilities via the Park. Improvements to Ring Road would be designed and constructed in coordination with NYCDOT, NYC Parks, the NYC Department of Environmental Protection (NYCDEP), and the Metropolitan Transportation Authority (MTA).

Discretionary actions are required to effectuate the Proposed Development. The "Proposed Actions" include: 1) City Map Amendments, 2) Zoning Map Amendments, and 3) Modification of the Existing Concession License. Additionally, the New York State Legislature and gubernatorial approval is required to allow the alienation of parkland. Approval by the Gaming Facility Location Board and issuance of a gaming license from the New York State Gaming Commission is also required.

Figure 1: Aerial Map



The Development Site is located on the site of a former municipal solid waste landfill that closed in 1970 and is actively monitored by NYC Parks. In 2000, the New York State Department of Environmental Conservation (NYSDEC) issued Part 360 Permit No. 2-6006-00014 (the "Part 360 Permit") to allow the import and placement of nonhazardous, regulated fill that was necessary to construct the Golf Course. In 2013, NYC Parks prepared a Post Construction Custodial Care Plan (PCCCP) to comply with the requirements of the Part 360 Permit and to define the post-construction criteria applicable to operate, monitor, and maintain the environmental protection systems installed at the former landfill. In addition, a Declaration of Covenants and Restrictions was recorded against the former landfill property. Additionally, any roadway improvements outside the Park may require approval by New York State Department of Transportation (NYSDOT).

The Proposed Actions would allow the development of an approximately 3, 093,880- gsf gaming facility on the Development Site. The Proposed Facility would contain approximately 561,320 gsf of gaming and food and beverage space, a 500-key hotel with a spa and meeting space, a 2,000-person event center, approximately 6,100 gsf of retail space, and approximately 1,941,910 gsf of parking. The Applicant would also construct a replacement clubhouse and practice area for the Golf Course as part of the Proposed Development. The majority of the 18 holes that comprise the Golf Course would remain as existing conditions absent potential mitigation due to shadow impacts and would continue to be open to the public.

The Affected Area is within the City's Coastal Zone and is in a designated "Special Natural Waterfront Area," as shown in Figure 2. Accordingly, the Proposed Actions are subject to review for consistency with the policies of the 2017 New York City Waterfront Revitalization Program (WRP).

Figure 2: Special Natural Waterfront Areas of the WRP



Source: https://www.nyc.gov/site/planning/planning-level/waterfront/wrp/wrp-2.page

The WRP outlines policies designed to maximize the benefits derived from economic development, environmental preservation, and public use of the waterfront, while minimizing the conflicts among those objectives. The Proposed Development is not on the waterfront and will not disturb waterfront areas. The Proposed Development would be near the waterfront and would promote waterfront protection and use.

The WRP Consistency Assessment Form, above, lists the WRP policies and indicates in a checklist format whether the Proposed Actions would promote or hinder a WRP policy, or if a policy would not be applicable. This section provides additional information for the policies identified to "promote" or "hinder" in the WRP Consistency Assessment Form, and follows the guidance established in the NYC Waterfront Revitalization Program User

Manual[1] and the November 2018 update of New York City's WRP policies for climate change adaptation related to Policy 6.2.[2]

Policy 1: Support and facilitate commercial and residential redevelopment in areas well-suited to such development.

Policy 1.1: Encourage commercial and residential redevelopment in appropriate Coastal Zone areas.

The Proposed Development is in an area well-suited to attract tourists and residents. The area is easily accessible from regional destinations because of its location near the Hutchinson River Expressway and connections to other major highways, the Ferry Point Park Ferry Stop, and New York City's airports. The Proposed Development's unique location would be a regional draw and promote economic development, with the potential to generate significant New York State and local government tax revenue. According to the analysis provided in Chapter 3 "Socioeconomic Conditions" of the Environmental Impact Statement (EIS), the Proposed Development would generate increased local spending at nearby restaurants, gas stations, and convenience stores and retail establishments, which would benefit the Study Area population. New York State and New York City would also benefit from gaming taxes, corporate and employee income taxes, sales, hotel, and property taxes, and bridge/tunnel tolls. The Proposed Actions would beneficially alter economic patterns by attracting new economic activity to the Study Area and the Bronx. When complete, the Proposed Development would be one of the largest Bronx employers and one of the largest privately funded projects in Bronx's history.

The Development Site is upland from the waterfront and does not contain watercourses or wetlands. It is currently used for parking, the golf clubhouse, a portion of the course's practice area, and landscaped areas. The Development Site is improved with about 31,000 square feet (sf) of buildings, approximately 230,000 sf of parking lot or paved walkways, and approximately 423,000 sf of landscaped areas (which includes approximately 97,000 sf of practice area). Users of the Development Site typically include members of the public who are golfing or visiting the existing golf clubhouse. Outside of the practice area, the landscaped areas are primarily used by the golf clubhouse staff in connection with course maintenance but may occasionally be accessed by golfers or other park visitors. The Golf Course is typically open from late March to the beginning of December. During the winter season, the course and pathways are closed to the public.

The Proposed Development would result in the removal of the existing uses on the Development Site – including approximately six acres of surface parking or other paved areas – to allow the development of the Proposed Facility. The Proposed Development would introduce a commercial use – a destination gaming facility – near major arterial roadways that connect the site to other boroughs, Nassau and Westchester counties, and southern Connecticut and northern New Jersey. With the project, the clubhouse, parking, and portion of the practice area will be replaced. The majority of the 18 holes that

[1] https://www.nyc.gov/assets/planning/download/pdf/planning-level/waterfront/wrp/revisions-2017/wrp-user-manual.pdf
[2] https://www.nyc.gov/assets/planning/download/pdf/planning-level/waterfront/wrp/revisions-2017/policy-62-guidance-document-nov2018.pdf

comprise the Golf Course would remain unchanged absent potential mitigation due to shadow impacts and would continue to be open to the public.

The Proposed Facility was designed to create separation from the nearby residential uses by siting the Proposed Development more than 1,000 feet west of the residences in the Throggs Neck neighborhood. Additionally, the Proposed Facility would be sited north of the parking lot and walking paths that are within Ferry Point Park east of the Hutchinson River Expressway. This would allow separation between the East River waterfront and the Proposed Facility, while maintaining open space along the waterfront for public use. Publicly accessible areas in the Proposed Facility would provide new and enhanced views of the East River, Whitestone Bridge, and Manhattan and Queens skylines,

Improvements to Ring Road would enhance experience for users of the Park by creating new and safer connections under the Whitestone Bridge for pedestrians and cyclists. The improvements to Ring Road would create a sidewalk and bike lane where none currently exists. These Ring Road improvements will create an important connection, linking the west side of the Park to the waterfront area and walking paths on the east side of the Park.

As further described in Policy 4.5, below, wetlands would not be disturbed by the Proposed Development.

The Development Site currently has both water and sewer connections. As further discussed in Policy 1.3 below, the existing public infrastructure can support the Proposed Development with appropriate modifications. The Proposed Development would comply with the Uniform Stormwater Rule, and pretreatment and volume control of stormwater would be required before discharge into the City's stormwater system.

The Proposed Facility would be sited in an area with existing buildings and parking lots, thereby limiting development to previously disturbed areas. The Proposed Facility would be sited more than 1,000 feet from residential uses, and over 400 feet from the East River providing a buffer between the Proposed Facility and these sensitive uses. The Proposed Facility would be within a public park that is served by existing public infrastructure that will have the capacity to support the Proposed Development. The Development Site is strategically located to attract visitors while also minimizing the potential effects of the Proposed Actions on the Coastal Zone.

Thus, the Proposed Development would promote Policy 1.1.

Policy 1.2 Encourage non-industrial development with uses and design features that enliven the waterfront and attract the public.

The Proposed Development would be a non-industrial development that would have uses and design features that would enliven the waterfront and attract the public. The Proposed Facility is expected to draw additional users to the waterfront with new uses such as a gaming facility, hotel, and food and beverage establishments. The Proposed Facility would also be open 24 hours a day, creating opportunities for users to enliven the waterfront throughout the day.

The Proposed Facility incorporates design features that reflect its location in a waterfront park. Active recreational uses within the Park would be accessible from the Proposed Facility via pedestrian connections to the walking paths south of the Development Site and along Ring Road. The Proposed Facility is designed to maximize views of surrounding visual resources, such as the East River, Ferry Point Park, the Whitestone Bridge, and the

Queens and Manhattan skylines. The Proposed Facility also incorporates architectural features – such as rounded roof elements and a series of setbacks – that relate to the links-style Golf Course.

Improvements to Ring Road would create new pedestrian and cyclist connections underneath the Whitestone Bridge, creating a continuous connection between the eastern and western portions of the Park that are currently bisected by the Whitestone Bridge. These new connections would not exist in the existing and No-Action conditions.

Thus, the Proposed Development would promote Policy 1.2.

Policy 1.3: Encourage redevelopment in the Coastal Zone where public facilities and infrastructure are adequate or will be developed.

The Proposed Development would encourage development in an area where public facilities and infrastructure are adequate or will be developed. The Affected Area is part of the Park and is in an urbanized area of the Bronx. The Affected Area is currently served by essential public facilities and services such as public schools, libraries, early childhood programs, police, fire, and health services. The Affected Area is proximate to roadways such as the Hutchinson River Expressway and is accessed via an existing park roadway. Infrastructure such as water, sewer and roadways are located on or next to the Affected Area. The Affected Area is also accessible from the Ferry Point Park Ferry Stop and bus stops near the Park.

Public facilities on the Development Site include the Golf Course, golf clubhouse, parking, and landscaped areas. Public recreational facilities already developed in the Park include walking paths, soccer and cricket fields, basketball courts, football fields, playgrounds, barbequing areas, and a restroom.

With approval of the Proposed Actions, the Applicant would construct a destination gaming facility on the Development Site. The Applicant would also construct a replacement standalone clubhouse for the Golf Course, and parking would be available for Golf Course users. The majority of the 18 holes that comprise the Golf Course would remain as they currently exist absent potential mitigation due to shadow impacts and would continue to be open to the public. Similarly, the walking paths to the south of the Development Site and along the East River waterfront would continue to be open to the public. Ring Road would be improved, and the western portion of the Park – where the active recreation park facilities are located – would remain unchanged except for the improvements to Ring Road.

As described in Chapter 11, "Water and Sewer Infrastructure" of the EIS, the Hunts Point Wastewater Resource Recovery Facility (WRRF) treats sanitary wastewater generated at the Development Site. The WRRF could accommodate the flows from the Proposed Development without exceeding the WRRF's design capacity. The Proposed Development is projected to produce a net increase of approximately 382,053 gallons per day (gpd) of sanitary wastewater, which represents 0.57 percent of the WRRF's available capacity.

Certain infrastructure improvements would be made to accommodate the Proposed Development. The Development Site is within a Municipal Separate Sewer (MS4) area, requiring separate storm and sanitary sewer systems. The existing 3-inch-diameter sanitary force main connection to the City's combined sewer in Emerson Avenue may be upgraded and, if required, would be reviewed and approved as a part of the NYCDEP permitting process. A hydraulic analysis would be required as a part of the NYCDEP permitting process prior to the submittal of the Site Connection Proposal Application. In

addition, the existing drainage plan may be amended based on the hydraulic analysis calculations and would be reviewed and approved by NYCDEP. Existing and proposed site connections would also be provided to NYCDEP during the permitting process.

Impervious area would increase with the Proposed Development and thus would increase stormwater runoff. Stormwater generated at the Development Site would continue to be discharged to the stormwater sewer that runs to the east of the Whitestone Bridge in the Park and then ultimately to the East River. Ownership and capacity of existing outfalls are currently being investigated. The Applicant would connect to this existing stormwater sewer through the applicable review and approval process.

The Proposed Development would comply with NYCDEP's Unified Stormwater Rule (Chapters 19.1 and 31 of Title 15 of the Rules of the City of New York [RCNY]). In accordance with this rule, pretreatment and volume control of stormwater runoff prior to discharge would be required, thereby improving the quality of water being discharged into the sewer and the surrounding waterbodies. Further details of the site connection process to existing stormwater outfalls are discussed in Policy 5.1.

Ring Road is a park roadway and is known to flood during heavy rainstorms. With the Proposed Actions, Ring Road would be transferred from NYC Parks to NYCDOT. As part of NYCDOT requirements, stormwater catch basins, and conveyance pipes would be installed along Ring Road. Ring Road's stormwater infrastructure would comply with NYCDEP's stormwater regulations and design standards. With oversight from NYCDOT and NYCDEP, Ring Road would be designed and constructed to meet NYCDOT and NYCDEP's current standards. Additionally, Ring Road would be widened and would include a sidewalk, bike lane, parking spaces where practicable, and two moving lanes. Pedestrian safety features would also be incorporated.

Thus, the Proposed Development would promote Policy 1.3.

Policy 1.5 Integrate consideration of climate change and sea level rise into the planning and design of waterfront residential and commercial development, pursuant to WRP Policy 6.2.

The Proposed Development considers climate change and sea level rise pursuant to WRP Policy 6.2. Details are provided in the Policy 6.2 discussion below. The Proposed Facility would locate critical elements above the current and projected future one percent annual chance flood hazard elevation and would use waterproofing methods for spaces below the Design Flood Elevation in accordance with New York City Building Code (NYCBC) Appendix G.

Accordingly, the Proposed Actions would promote the integration of adaptive strategies into the planning and design of the Proposed Development to protect the Proposed Development from the potential effects of climate change and sea level rise.

Thus, the Proposed Development would promote Policy 1.5.

Policy 4: Protect and restore the quality and function of the ecological systems within the New York City coastal area.

Policy 4.1 Protect and restore the ecological quality and component habitats and resources within the Special Natural Waterfront Areas

As shown in Figure 2, the Affected Area is in the East River/Long Island Sound Special Natural Waterfront Area, which is defined in the WRP as "a large area with significant open spaces and concentrations of natural resources including wetlands, habitats, and buffer areas." The Proposed Facility would be developed on the Development Site, located within Ferry Point Park – a 413.8-acre open space that has about 9,000 feet of waterfront. The existing uses on the Development Site, including the Golf Course, were constructed within the footprint of the closed landfill, and vegetation on the Development Site is maintained in connection with the Golf Course. The Development Site does not contain wetlands or watercourses.

The Proposed Facility would be sited over 400 feet away from the waterfront and is largely developed within existing impervious surface areas (the golf clubhouse and parking lot) and areas of maintained landscaping. The southern portion of the Development Site is vegetated with scattered low trees and an area of gravel. The area around Ring Road is similarly characterized by impervious roadway, lawn, and gravel areas.

As discussed in Chapter 9 of the EIS, "Natural Resources," the Affected Area is not anticipated to serve as habitat for large populations of terrestrial wildlife. Further, no state- or federal-listed threatened or endangered bird species, or U.S. Fish and Wildlife Service (USFWS)-listed Birds of Conservation Concern, were observed during the May 2024 bird survey. NYSDEC maps rare dragonflies and damselflies, not listed as threatened or endangered by NYSDEC, and habitat for the state-listed endangered peregrine falcon (*Falco peregrinus*) within the Study Area but outside of the Affected Area. The Proposed Development is not anticipated to result in disturbance to these species' habitat.

The USFWS Information for Planning and Consultation (IPaC) Species List generated for the Affected Area identifies the federally listed threatened (state listed endangered) piping plover as a species to be considered for activities within the Affected Area. Because the Study Area is located outside of the known range of breeding populations of piping plover in New York City, the Proposed Development is not anticipated to have a significant effect on piping plover populations.

The IPaC system also identified the federally listed endangered (state listed endangered) northern long-eared bat, and the federally proposed endangered (state unlisted) tricolored bat as a species to be considered if wind turbine operations were developed within the Affected Area. Because the Proposed Development would not include wind turbines, the northern long-eared bat and tricolored bat do not need to be considered in an effects analysis of activities in the Affected Area (per the USFWS IPaC system). The IPaC report also confirmed the absence of designated, critical bat habitat onsite. However, out of an abundance of caution the Whitestone Bridge was surveyed by field scientists for potential active use by bats as roosting habitat in June 2024; the study concluded the bridge was unlikely to be an active roosting habitat.

As further discussed in Policy 4.5, a freshwater wetland was identified near the southern edge of Ring Road, to west of the Whitestone Bridge; Ring Road would be designed to avoid disturbance within this wetland.

The Proposed Development would not introduce new activities that would significantly change the ecological systems and their natural processes surrounding the Development Site and Ring Road. The Proposed Development would follow the Unified Stormwater Rule to manage stormwater volumes and follow Best Management Practices (BMPs) to avoid potential impacts to surrounding waterbodies. The Uniform Stormwater Rule also requires that a portion of stormwater runoff from a newly developed site be treated. Thus, the Proposed Actions would improve water quality over existing conditions and would avoid any impacts to nearby wetlands through treatment and volume control. These measures would protect the existing ecological systems surrounding the Development Site and Ring Road.

New plantings selected at the Development Site would be limited to native and non-invasive species. Maintenance of new plantings on the Development Site would also be the responsibility of the Applicant. These new plantings would provide potential habitat for wildlife.

Thus, the Proposed Development would promote Policy 4.1.

Policy 4.5: Protect and restore tidal and freshwater wetlands.

Tidal wetlands and surface waters are mapped in the East River and Westchester Creek proximate to the Development Site. However, no tidal or freshwater wetlands exist on the Development Site and existing adjacent wetlands would be undisturbed by the Proposed Development. The Proposed Development would connect to existing stormwater sewers that ultimately discharge to the East River and Westchester Creek. Connection to these systems would follow the applicable permitting process and discharges would conform to the requirements of the Unified Stormwater Rule. Stormwater would be conveyed through these existing storm sewers and discharged to either the East River or Westchester Creek through existing outfalls. No significant impacts to tidal wetlands are anticipated as a result of stormwater outfall use.

Field studies and desktop research completed as part of Chapter 9 of the EIS, "Natural Resources" confirmed the presence of freshwater and tidal wetlands within the Park. Tidal wetlands were found along the waterfront of the western portion of the Park. These tidal wetlands are under the jurisdiction of NYSDEC and are over 400 feet from the Proposed Facility, and more than 150 feet from the areas where Ring Road is proposed to be widened. The tidal wetlands along the western edge of the Park would be unaffected, except for potential temporary disturbance to improve outfalls or stormwater sewers.

As required by the Unified Stormwater Rule, new pretreatment measures would be installed, thereby improving the quality of water discharged from the stormwater outfalls into the East River or Westchester Creek.

A freshwater wetland under the jurisdiction of the United States Army Corps of Engineers (USACE) was also identified near the southern edge of Ring Road, to west of the Whitestone Bridge. Ring Road is designed to avoid disturbance to this wetland. The final design of Ring Road would be confirmed in consultation with NYCDOT, NYCDEP, and NYC Parks. During construction, common measures to protect the wetland could include the placement of a silt fence around the limit of disturbance, and inlet protection for both soil erosion and sediment control measures.

Independent of the Proposed Actions, NYCDOT is proposing to create new tidal wetlands to the south of the Development Site, along the edge of the East River and to the east of the Whitestone Bridge. NYCDOT's wetland improvement project would be completed

after the 2030 analysis year, but construction of the proposed tidal wetlands is likely to start before 2030; thus, this project is included as a No-Build project in Chapter 2 of the EIS, "Land Use, Zoning, and Public Policy." The Applicant would coordinate with NYC Parks and NYCDOT to ensure that general construction activity or potential outfall improvements would not preclude or substantively inhibit NYCDOT's proposed wetland mitigation project. Accordingly, the Proposed Actions would protect existing and future wetlands within the Park.

Thus, the Proposed Development would promote Policy 4.5.

Policy 5: Protect and improve water quality in the New York Coastal area.

Policy 5.1: Manage direct or indirect discharges to waterbodies.

The Proposed Development would generate new stormwater discharges to the East River and Westchester Creek. Stormwater runoff from the Development Site and Ring Road is currently directly discharged to the East River and Westchester Creek via existing outfalls. With the Proposed Actions, stormwater generated at the Development Site and Ring Road would continue to be discharged to the East River and Westchester Creek. Stormwater runoff from other portions of the Park and Golf Course that are outside the Proposed Development would not be affected by the Proposed Actions.

The stormwater management from the Proposed Development would be designed and permitted in accordance with the NYCDEP's Unified Stormwater Rule and other rules, as applicable. The Unified Stormwater Rule requires that stormwater quality and quantity be managed, and project-generated stormwater be treated prior to discharge. The stormwater management practices of the Unified Stormwater Rule are designed to protect, restore, or mimic the natural water cycle within built environments by detaining and treating stormwater runoff before allowing stormwater to be discharged from the site.

The Development Site will use stormwater BMPs such as a green roofs, hydrodynamic separators, or other NYCDEP-approved stormwater management practices to treat and reduce the volume of stormwater directed off-site to meet NYCDEP the requirements of the Unified Stormwater Rule. Detention tanks, detention ponds or other means of detaining stormwater may be used to meet NYCDEP requirements. Additional coordination with NYCDEP will be required during the site connection permitting process to determine the feasibility and applicability of specific stormwater management practices on the Development Site.

The Proposed Development would use existing stormwater sewers to convey stormwater. The Applicant would connect to the existing stormwater sewers through the applicable review and approval process.

A State Pollutant Discharge Elimination System (SPDES) general permit would be required for construction. As required by this permit, the Applicant would develop a Storm Water Pollution Prevention Plan (SWPPP) to address temporary (construction-related) stormwater management measures. The SWPPP would define the required temporary (construction) and permanent erosion control measures to minimize erosion and stabilize surfaces (i.e., vegetative covers, pavement, gravel, etc.). The goal of a SWPPP is to protect the quality of the City's waterways by preventing erosion and sedimentation during construction. The SWPPP would also require a monitoring program during construction to document the construction's consistency with the NYSDEC-approved SWPPP.

With these measures in place, the Proposed Development would manage discharges to and improve the water quality discharged to the East River and Westchester Creek.

Thus, the Proposed Development would promote Policy 5.1.

Policy 5.4: Protect the quality of groundwater, streams, and the sources of water for wetlands.

The Affected Area is not above a sole-source aquifer and the Proposed Actions would not introduce new processes that have the potential to affect groundwater. As a part of the *2023 Semi-Annual Post-Closure Certification Report*, a groundwater monitoring well is currently being sampled on a biennial basis. Groundwater monitoring will continue during construction and post-construction. Therefore, the Proposed Actions would not affect the quality or quantity of groundwater. Additionally, there are no streams present within the Affected Area, and the Proposed Actions are not anticipated to affect any nearby streams.

Further, as described in Policy 5.1, project-generated stormwater would be discharged directly to the East River and Westchester Creek via existing stormwater sewers and outfalls and in accordance with current regulations of the applicable agencies. The connection process would provide regulatory oversight to protect the quality of groundwater, streams, and sources of water for wetlands. With this oversight, the Proposed Development would protect water quality.

Ground-intrusive activities necessary to develop the Proposed Facility would be conducted pursuant to a change of use work plan approved by NYSDEC, and environmental oversight and monitoring would be conducted under the supervision of a licensed engineer. Per the change of use work plan, the licensed engineer would oversee the screening of excavated material, observe imported materials, and implement a stormwater pollution prevention plan. Additionally, project-generated solid waste would be removed per NYSDEC requirements, thereby minimizing the potential degradation of nearby groundwater, streams, or sources of water for wetlands.

Accordingly, the Proposed Development would promote Policy 5.4.

Policy 5.5: Protect and Improve water quality through cost-effective grey-infrastructure and in-water ecological strategies.

As discussed in Policy 5.3, the Development Site would comply with the Unified Stormwater Rule. The Unified Stormwater Rule sets requirements to manage stormwater volumes and requires that a portion of stormwater runoff from a newly developed site be treated before discharge to a City sewer. The Development Site will use stormwater best management practices such as a green roofs, hydrodynamic separators, or other NYCDEP-approved stormwater management practices to treat and reduce the volume of stormwater directed off-site, as required by the Unified Stormwater Rule. Detention tanks, detention ponds or other means of detaining stormwater (potential grey-infrastructure) may be used to meet these requirements. Additional coordination with NYCDEP will be required during the design phase to determine the feasibility and applicability of specific stormwater management practices on the Development Site.

The Development Site is not located along the waterfront and no in-water ecological strategies will be completed. Connection to existing stormwater sewers, which ultimately discharge to the East River and Westchester Creek, would be designed and constructed in coordination with the applicable regulatory agencies to avoid significant adverse impacts.

Accordingly, the Proposed Development would promote Policy 5.5.

Policy 6: Minimize loss of life, structures, infrastructure, and natural resources caused by flooding and erosion, and increase resilience to future conditions created by climate change.

Policy 6.1: Minimize losses from flooding and erosion by employing non-structural and structural management measures appropriate to the site, the use of the property to be protected, and the surrounding area.

The Proposed Development would be designed and constructed to minimize losses from flooding and erosion. As shown in Figure 3, the NYC Flood Hazard Mapper, which includes mapping data from the Preliminary Flood Insurance Rate Map (pFIRM) published by the Federal Emergency Management Agency (FEMA), also included as Figure 4, identifies portions of the Development Site in a one percent annual chance (1-in-100 year) floodplain with a Base Flood Elevation (BFE) of 13 feet, as measured in the North American Vertical Datum of 1988 (NAVD88).[3] Additional portions are shown in the 0.2-percent annual chance (1-in-500 year) floodplain, and the majority of the Development Site is an area of minimal flood hazard chance.

The design flood elevation (DFE) for the Proposed Development would be two feet above the current BFE, as required by Appendix G of the New York City Building Code; therefore, the DFE would be at least elevation 15 feet NAVD88 (BFE plus 2 feet of freeboard). Ring Road is mapped within the one percent (1-in-100-year) annual chance floodplain at elevations ranging from 13 to 14 feet (NAVD88).

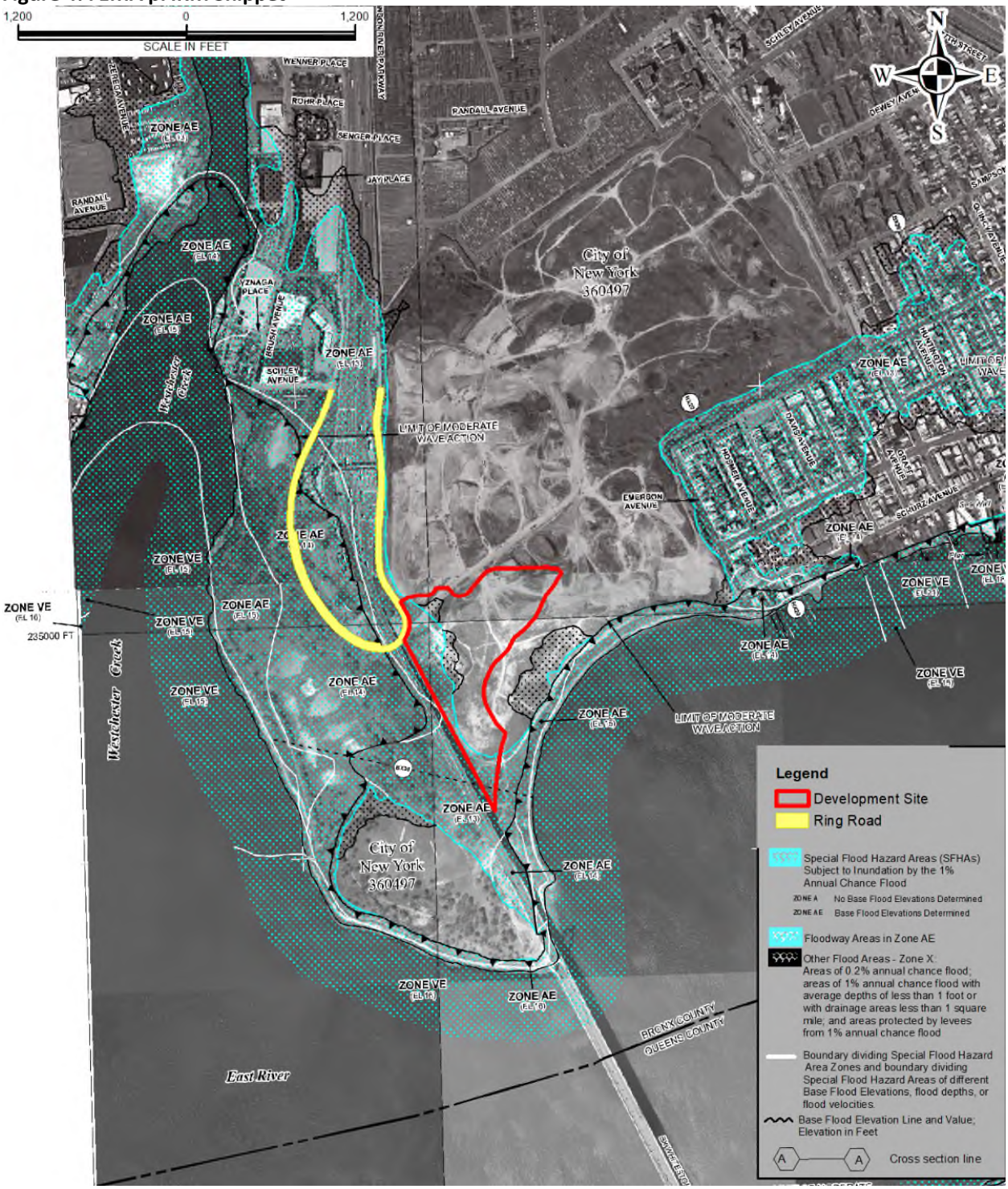
[3] The effective flood map for the Development Site is located on pFIRM Panel #3604970112F maintained by FEMA.

Figure 3: Preliminary Flood Hazard Areas



Source: NYC Flood Hazard Mapper (NYCDCP)

Figure 4: FEMA pFIRM Snippet



Source: FEMA Flood Map Service Center, pFIRM panels, #3604970104F, #3604970112F (containing the Development Site), #3604970103F, and #3604970111F

The NYC WRP relies on the New York City Panel on Climate Change (NPCC) projections (as published in a 2015 report) to evaluate the effects of climate change and sea level rise.

The NPCC projections predict sea level rise for a variety of probabilities (median and about one and two standard deviations above and below) over a number of years (2020s, 2050s, 2080s, and 2100).

The design of the Proposed Development considers the median (or "Mid scenario") sea level projection and year 2100 (i.e., a 70+ year design life for all structures) where a specific scenario is required, and year 2100 projections where evaluating all scenarios are required by the NYC WRP Policies. The year 2100 sea level rise projections vary from 15 inches (10th percentile) to 36 inches (50th percentile) to 75 inches (90th percentile).

The year 2100 adjusted one percent annual chance base flood elevation ("adjusted BFE") is projected to increase to elevation +16 feet NAVD88 under the Mid sea level rise scenario. The 90th percentile (High scenario) sea level rise adjusted BFE would be +19.25 feet NAVD88.

As discussed in more detail below under Policy 6.2, the lowest floor of the Proposed Development (the cellar of the Proposed Facility and the ground floor of the replacement golf clubhouse) would be designed at elevation 15 feet NAVD to meet the NYCBC Appendix G requirements and minimize losses during the FEMA defined one percent annual chance flood event. The DFE of 15 feet would be above the projected year 2100 Mid-low scenario, which projects a one percent annual chance flood elevation of 14.83 feet, but below the 90th percentile high scenario of +19.25 feet NAVDD88.

The design of the Proposed Development would not preclude the ability to floodproof the building to a higher elevation as flood conditions change with sea level rise. Specifically, the waterproofed foundation and flood barriers could be increased vertically to address changing future flood levels. The Proposed Actions also would not preclude the implementation of adaptive solutions in the future, including any technological advancements not yet developed.

The Proposed Development would be designed and constructed to meet the drainage requirements of the applicable regulatory agencies. The applicable regulatory agencies would also review and approve the SWPPP under the SPDES general permit for construction. The SWPPP would define the required temporary (construction) and permanent erosion control measures to minimize erosion and stabilize surfaces (i.e., vegetative covers, pavement, gravel, etc.) under any scenario.

Thus, the Proposed Development would promote Policy 6.1.

Policy 6.2: Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in New York City Panel on Climate Change 2015 Report, Chapter 2: Sea Level Rise and Coastal Storms) into the planning and design of projects in the City's Coastal Zone.

The Proposed Development is within the New York City Coastal Zone. As such, the Proposed Development must be reviewed for potential inconsistencies with the NYC WRP. As of 2016, when the most recent version of the WRP was adopted, residential and commercial developments (such as proposed for the Development Site) must include an evaluation of the effects of sea level rise on a proposed discretionary project. The evaluation considers both "chronic hazards" (i.e., daily tide cycle flooding) and "extreme events" (i.e., hurricanes, nor'easters, coastal storms). The vulnerability of the proposed development to chronic hazards and extreme events is dependent on the elevation of sea level and the rise in water height caused by extreme events (storms).

Coastal floodplains are influenced by astronomic tide and meteorological forces (storms) and are not influenced by fluvial flooding (river or stream flooding that occurs due to excessive rain or snowmelt). As such, costal floodplains are not affected by the placement of obstructions within the floodplain. Therefore, the Proposed Development would not exacerbate future projected flooding conditions.

Guidance documents[4] developed by DCP provide a method to determine a project's consistency with Policy 6.2.[5] The information discussed below incorporates the information obtained from the completed WRP Policy 6.2 worksheets which follows this assessment.

Existing Conditions

The Development Site is currently part of the Golf Course in the Park. Ground elevations vary from about elevation 12 feet NAVD88 in the southwest of the Development Site to as high as 42 feet NAVD88 in the northeast. As such, the vulnerability to flooding varies depending on the location in the Development Site.

As discussed under Policy 6.1, the FEMA 2015 pFIRM shows the Development Site has a Base Flood Elevation (BFE) of 13 feet NAVD88. Therefore, the majority of the site is currently above the current one percent annual chance BFE.

The existing sea level elevation is based on tide gauge measurements monitored and reported by the National Oceanographic and Atmospheric Administration (NOAA). NOAA maintains a series of tide gauges around the country's coastline. The nearest tide gauge is at the Throggs Neck Bridge. The NYC WRP considers the Mean Higher High Water (MHHW) elevation (the average of the daily higher high tide). For the Throggs Neck gage, the current MHHW elevation is +4.01 feet NAVD88.[6] Therefore, the entire Affected Area is currently above the MHHW elevation.

Projections

As discussed above under Policy 6.1, the NYC WRP relies on the NPCC projections of sea level rise to evaluate the effects of climate change and sea level rise. Within the Development Site, the year 2100 adjusted BFE is projected to increase to elevation +16 feet NAVD88 under the 50th percentile Mid scenario, and to elevation +19.25 feet NAVD88 under the 90th percentile High scenario (see Figure 5).

Likewise, MHHW could increase to elevation +7.01 feet NAVD88 by 2100 under the Mid scenario, and to elevation +10.26 feet NAVD88 under the High scenario (see Figure 6).

Project Features

The Proposed Facility would have project features that are categorized as "vulnerable" and "critical." Of the analyzed features, the lowest "vulnerable" feature contemplated is the cellar of the Proposed Facility and the replacement golf clubhouse. The lowest cellar level of the Proposed Facility would be designed with a top-of-slab elevation equal to at

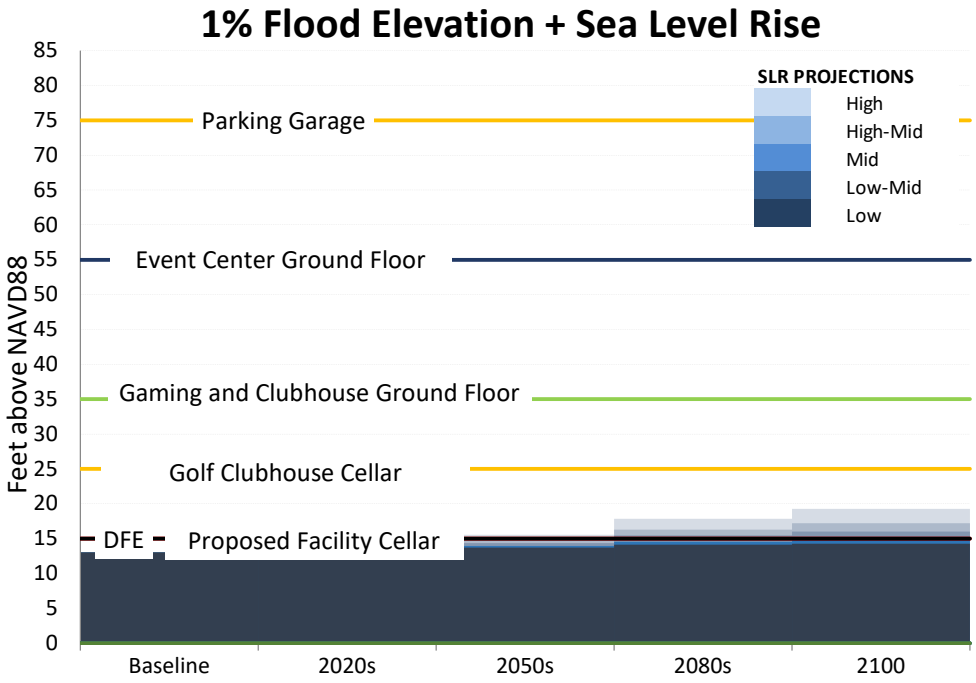
[4] New York City Department of City Planning (DCP) Climate Change Adaptation Guidance for Policy 6.2 (November 2018)

[5] "Detailed Methodology" is required because of "new vulnerable, critical or potentially hazardous features." The Proposed Development would contain both critical and vulnerable features.

[6] MHHW values include an addition 0.33 feet to account for changes in sea level since the 1983-2001 tidal epoch, per the NYC Waterfront Revitalization Program Policy 6.2 Flood Elevation Worksheet.

least the DFE of 15 feet NAVD88. At 15 feet, the DFE would be two feet above the current base flood elevation (BFE), as required by Appendix G of the New York City Building Code. If the floor or areas of the floor are modified to be at a lower elevation, the lower slab and cellar walls would be floodproofed to at least elevation 15 feet NAVD88 as required by the NYCBC Appendix G. Mechanical spaces are planned at or above elevation 15 feet; if modified to be below elevation 15 NAVD88 mechanical spaces would also be dry floodproofed up to at least the DFE. The proposed floodproofing would be achieved by a combination of waterproofed exterior walls and slabs, and, where applicable, flood gates at the building entrances.

Figure 5: One Percent Flood Elevation + Sea Level Rise



The mechanical and electrical spaces would be located in the cellar level at elevation 15 to conserve space on the ground floor; elevation 15 is above the adjusted BFE under the mid-low sea level rise scenario. Raising the basement above this elevation would introduce unacceptable grade changes and site access issue. Access for pedestrians and vehicles is of primary concern and the grades to access the ground floor and parking with a basement elevation of 15 are at the threshold of comfort; raising the building an additional 4.25 feet of elevation to meet the high SLR projection is impractical and undesirable for public access to the facility. The ground floor of the Proposed Facility is set at elevation 35, requiring moderately steep grading to achieve both pedestrian and vehicular access. Raising the building an additional 4.25 feet would create inaccessible and/or uncomfortable grading for pedestrians and vehicles.

To meet the adjusted BFE under the high SLR scenario, waterproofing the electrical and mechanical equipment rooms including waterproof walls and watertight doors would be further considered during detailed design development.

The lowest level of the replacement golf clubhouse would be at an elevation of 25 feet. The main floor of the Proposed Facility and replacement golf clubhouse has been designed at an elevation of 35 feet NAVD88. The gaming and retail uses within the ground floor of

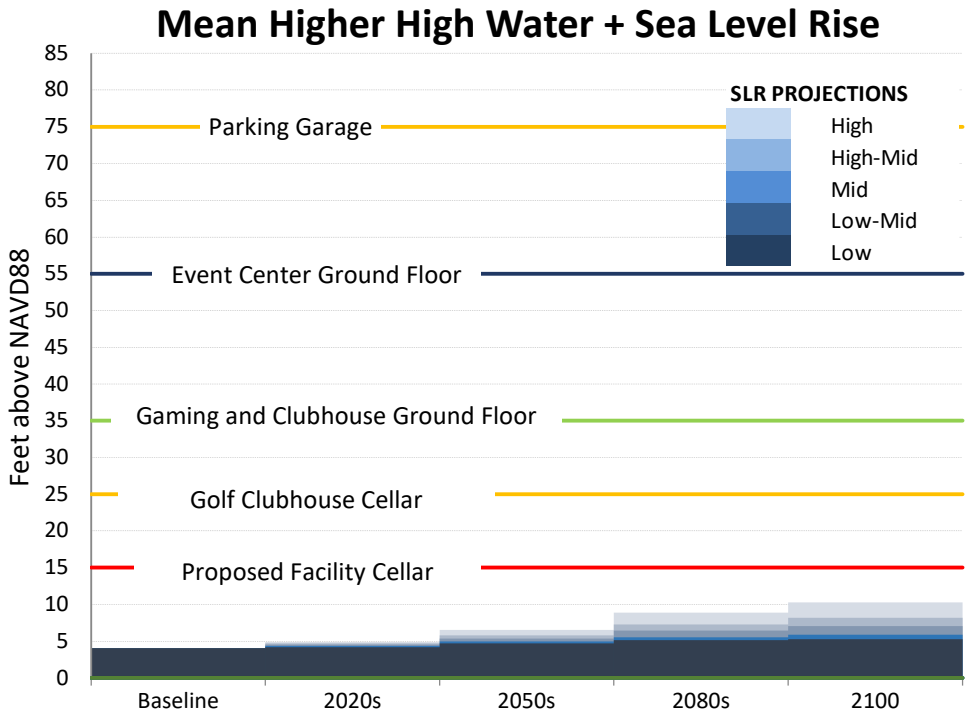
the Proposed Facility would be above the BFE through 2100 under all sea level rise scenarios.

Impact from One Percent Annual Chance Flood Hazard Area

The cellar of the Proposed Facility would be constructed at an elevation 2 feet above the current one percent annual flood hazard area to meet the requirements of the New York City Building Code. The cellar would remain above the one percent annual flood until about 2050 under high-SLR projections, until about 2080 under mid SLR projections, and through 2100 under the mid-low SLR scenario. Placing mechanical equipment within watertight spaces in the cellar would be considered during the detailed design phase to protect equipment under even the Year 2100 Adjusted BFE under the high-SLR scenario.

The main floor of the Proposed Facility, at elevation 35 feet, would be more than 15 feet above the one percent annual flood hazard through 2100 under all SLR projections. The replacement golf clubhouse, including the cellar at an elevation of 25 feet NAVD88, would be above the one percent annual flood hazard through 2100 under all SLR projections.

Figure 6: Mean Higher High Water + Sea Level Rise Projections



Impact from Mean Higher High Water (MHHW)

The Proposed Development's features are projected to be above the MHHW through 2100 under all SLR projections (see Figure 6).

Potential Future Adaptive Solutions

The Proposed Actions and subsequent design of the Proposed Development would not preclude the ability to floodproof the Proposed Facility and replacement golf clubhouse to a higher DFE as flood conditions change with sea level rise. Specifically, the waterproofed walls and flood barriers could be increased vertically to address changing

future flood levels. Flood gates could be placed at entrances that rise to an elevation of up to 20 feet. The Proposed Actions also would not preclude the implementation of adaptive solutions in the future, including any technological advancements not yet developed.

Policy Assessment Conclusion

Based on the above, the Applicant would integrate consideration of the latest New York City projections of climate change and sea level into the planning and design of the Proposed Development within the Coastal Zone.

Thus, the Proposed Development would promote Policy 6.2.

Policy 7: Minimize environmental degradation and negative impacts on public health from solid waste, toxic pollutant, hazardous materials, and industrial materials that may pose risks to the environment and public health and safety.

Policy 7.1: Manage solid waste material, hazardous wastes, toxic pollutants, substances hazardous to the environment, and the unenclosed storage of industrial materials to protect public health, control pollution and prevent degradation of coastal ecosystems.

The Development Site is within the footprint of a former municipal landfill that was the subject of extensive regulatory oversight by NYSDEC in its transformation to a golf course. Oversight is ongoing via a PCCCP, with NYC Parks responsible for inspection, monitoring, and reporting. A Declaration of Covenants and Restrictions recorded against the landfill property further requires written authorization from NYSDEC for a change of use other than the current use on the site (see Chapter 10 of the EIS, "Hazardous Materials").

The Proposed Development would be supported by deep foundations such as displacement piles anchored in bedrock, drilled piles, or steel/precast concrete piles. These foundation options would generate minimal spoil (excavated) material because in-ground materials are displaced laterally, compacting the surrounding material. Construction of the Proposed Development would not generate a significant amount of solid waste over a multiyear period and thus would not cause a disposal or processing facility to exceed capacity. Installation of the displacement piles or other foundation option would require breaching of the landfill cap and displacing material underlying the cap in targeted areas, which would be reviewed and approved by NYSDEC prior to construction.

During construction of the Proposed Development, material excavated in the footprint of the former landfill would be managed via a change of use workplan submitted to and approved by NYSDEC prior to construction. The change of use workplan would outline the measures required to handle and dispose of project-generated material, including solid waste, hazardous materials, toxic pollutants, and substances hazardous to the environment. The excavated material would be characterized and disposed of in accordance with City, State, and Federal regulations. Based on the change of use workplan, NYSDEC would maintain oversight of excavated materials and solid waste generated at the Development Site during construction. Post-construction, the PCCCP would be amended to reflect the new use on the Development Site and the Applicant's ongoing inspection, monitoring and reporting requirements.

During operation of the Proposed Facility, project-generated solid waste would be collected and transported by private commercial carters and would be subject to mandatory recycling requirements for paper, metals, construction waste, and aluminum as well as metal, glass, and plastic containers. Solid waste, hazardous materials, toxic pollutants, or substances hazardous to the environment would be characterized and disposed of in accordance with City, State, and Federal regulations. The Proposed Facility would not include unenclosed storage of industrial materials.

Thus, the Proposed Development would promote Policy 7.1.

Policy 7.2: Prevent and remediate discharge of petroleum products.

As discussed in Chapter 10 of the EIS, "Hazardous Materials," the Development Site operated as a municipal solid waste landfill on a portion of the Park to the east of the Whitestone Bridge from 1952 to the mid-1960s. Redevelopment of the landfill into the Park and Golf Course was accompanied by extensive soil and groundwater testing for petroleum products and the installation of engineering controls. In addition, periodic monitoring of groundwater and soil gas is conducted in accordance with the PCCCP. The *2023 Semi-Annual Post-Closure Certification Report* (Appendix F of the EIS) shows the absence of petroleum in soil or groundwater at the Development Site. Following development of the site, the PCCCP would be updated to define the future operation, maintenance, and monitoring requirements under the oversight of NYSDEC.

In addition to ongoing monitoring under the PCCCP, protocols will be put into place to prevent petroleum products from impacting the site and surrounding environment. If any underground storage tanks (USTs) or other sources of petroleum contamination be encountered during excavation, development activities would immediately cease, and the remedial engineer would be notified. USTs or other source material would be removed by a certified UST removal contractor under the supervision of the remedial engineer. Impacted soil would be excavated, properly stored, and sampled prior to off-site disposal. Soil samples would be collected from the excavation sidewalls and bottom to confirm the removal of petroleum impacts. If encountered, petroleum-impacted soil, groundwater, and tank contents would be properly disposed off-site at a licensed disposal facility.

Thus, the Proposed Development would promote Policy 7.2.

Policy 7.3: Transport solid waste and hazardous materials and site solid and hazardous waste facilities in a manner that minimizes potential degradation of coastal resources.

Project-generated solid waste would be collected and transported by private commercial carters and would be subject to mandatory recycling requirements for paper, metals, construction waste, and aluminum as well as metal, glass, and plastic containers. The Applicant's corporate waste and recycling program would apply to materials and refuse components at the Proposed Facility. This program emphasizes landfill avoidance, diversion, and recycling and reuse. The Applicant will supply the necessary source separation infrastructure at the Proposed Facility and work with suppliers and waste management vendors on program implementation.

Chapter 4, Part 364 of Title 6 of the Codes, Rules, and Regulations of the State of New York (6 CRR-NY) sets forth operating requirements to transport hazardous materials, and hazardous material identified on during construction would be transported in accordance with these guidelines and regulations. Per the NYSDEC-approved change of use work plan for the Proposed Development, a licensed engineer would oversee the screening of

excavated material, observe imported materials, and implement a SWPPP. Excavated material would be characterized prior to excavation and would be disposed in accordance with applicable City, State, and Federal regulations at an approved permitted disposal facility. Therefore, the NYSDEC-approved change of use workplan and the oversight of the workplan by a licensed engineer would minimize the potential for degradation of the surroundings, including coastal resources. Additionally, the agency approved SWPPP would outline BMPs to reduce potential pollutants via stormwater discharge into nearby coastal resources.

Thus, the Proposed Development would promote Policy 7.3.

Policy 8: Provide public access to, from, and along New York City's coastal waters

Policy 8.1: Preserve, protect, maintain, and enhance physical, visual and recreational access to the waterfront.

The Development Site is currently improved with the golf clubhouse, an approximately 178,930-sf surface parking lot, a portion of the golf practice area, and other landscaped areas. With the Proposed Actions, the Applicant would develop the Proposed Facility and replacement golf clubhouse on the Development Site. The Proposed Facility has been designed to allow pedestrian connections between the buildings, Golf Course, and the waterfront walking paths within the Park east of the Hutchinson River Expressway. A publicly accessible physical connection would be established to the East River's shoreline from the Golf Course that would not be present absent the Proposed Actions.

Through the proposed publicly accessible spaces within the Proposed Facility, the Proposed Actions would introduce new publicly accessible views to the Study Area's visual resources – particularly the East River, the Whitestone Bridge, the Manhattan skyline, and the Queens skyline across the East River – compared to the existing and No-Action conditions. The publicly accessible views would be at various levels, including at the ground floor and on the rooftop.

As a part of the Proposed Development, new pedestrian connections along Ring Road would allow connections between the eastern and western portions of Ferry Point Park under the Hutchinson River Expressway. With these new connections, the Proposed Development would enhance and extend existing physical and visual access along the East River waterfront within the Park.

Accordingly, the Proposed Development would improve physical, visual, and recreational access to the waterfront on the Development Site.

Thus, the Proposed Development would promote Policy 8.1.

Policy 8.2: Incorporate public access into new public and private development where compatible with proposed land use and coastal location.

The existing conditions on the Development Site provide limited physical public access to the East River waterfront. Visual access is available from select locations. The Proposed Actions would allow the Applicant to develop the Proposed Facility on the Development Site, which would introduce new publicly accessible views to the Study Area's visual resources compared to the existing condition as described in Policy 8.1. A new publicly accessible physical connection would also be established to the river's shoreline from the Golf Course. In coordination with NYC Parks, a pedestrian sidewalk from hole 18 would

link to the pathways near the East River shoreline within Ferry Point Park. This connection is still in the design phase, and any new connection to existing pedestrian infrastructure within Ferry Point Park would be reviewed and approved by NYC Parks. New pedestrian connections along Ring Road would also be developed and link the eastern and western portions of the Park, which would extend the physical and visual connections along the East River waterfront.

While commercial/residential waterfront sites typically require a waterfront public access area (WPAA) per NYC Zoning Resolution (ZR) 62-50, the Development Site would not require a WPAA per ZR 32-183(b): *Gaming Facility Text Amendment*. The recently adopted text amendment deems that sites for gaming facilities approved by the New York State Gaming Commission (at the time of their initial licensure) satisfy all applicable regulations of the NYC Zoning Regulations. Thus, with the gaming license from the New York Gaming Commission, the Proposed Facility would comply with zoning.

Accordingly, the Proposed Development allowed by the Proposed Actions would incorporate public waterfront access within an existing public open space by private developers.

Thus, the Proposed Development would promote Policy 8.2.

Policy 8.3: Provide visual access to the waterfront where physically practical.

The Applicant would develop the Proposed Facility on the Development Site, which would rise to a height of 280 feet. Through the proposed publicly accessible spaces within the Proposed Facility, the Proposed Actions would introduce new publicly accessible views of the East River, the Whitestone Bridge, and the Manhattan and Queens skylines compared to the existing and No-Action conditions. Additionally, views of the East River waterfront would remain unobstructed from key areas of the Park such as the walking paths south of the Development Site. Partial views of the East River in upland areas would continue to be available to visitors at the Development Site. Views of the waterfront from locations west of the Hutchinson River Expressway would remain unchanged. Therefore, the Proposed Development would provide new opportunities for unobstructed visual access to the East River waterfront from various levels within the Proposed Facility.

Accordingly, the Proposed Development allowed by the Proposed Actions would provide visual access to the waterfront.

Thus, the Proposed Development would promote Policy 8.3.

Policy 8.4: Preserve and develop waterfront open space and recreation on publicly owned land at suitable locations.

The Proposed Actions would allow the Applicant's Proposed Facility on the Development Site, which is parkland that was previously disturbed to develop the Golf Course, golf clubhouse, and paved surface parking and pathways. The Development Site is sited away from residences and local businesses and is within the Park to minimize land use conflicts between the Proposed Facility and these areas. The development of the Proposed Facility would eliminate approximately six acres (266,737-sf) of surface parking and other paved areas developed on mapped parkland – an accessory use to the Park. The existing vegetation on the Development Site includes manicured lawns and other vegetation to support the Golf Course, rather than naturally occurring vegetation. The Proposed Facility would provide gaming, hotel, and retail uses to the public on a portion of current parkland that would not otherwise provide significant open space or recreational uses to the public.

The Proposed Development would not affect the Park's core recreational uses provided to the public west of the Hutchinson River Expressway, including the soccer, football, and cricket fields and other active uses. Additionally, the Proposed Development would preserve the existing Golf Course and would provide the public with new publicly accessible commercial uses (gaming) that would not available absent the Proposed Actions. A physical connection would also be established to the river's shoreline from the Golf Course that would not be available absent the Proposed Actions.

Accordingly, the Proposed Development allowed by the Proposed Actions would be developed on publicly owned land at a suitable location to support open space and recreational uses.

Thus, the Proposed Development would promote Policy 8.4.

Policy 8.5: Preserve public interest in and use of lands and waters held in public trust by the State and City.

The Proposed Actions include the alienation of parkland, which currently contains the golf clubhouse, a surface parking lot, a portion of the practice area and other landscaped areas. The alienated parkland (see Appendix C of the EIS for the metes and bounds of the alienated parcels) would be the minimum land required to construct the Proposed Facility. The Proposed Actions would allow the development of the Proposed Facility, which would eliminate approximately 266,737-sf of surface parking and other paved areas developed on mapped parkland – uses that support the Golf Course. Other supportive uses to the Golf Course such as the practice area and golf clubhouse would be removed and reconstructed near the Proposed Facility. The core recreational uses of the Park would be preserved, and new commercial uses would be accessible to the public. The majority of the Golf Course's 18 holes absent potential mitigation due to shadow impacts would be preserved. As a part of the Proposed Development, a new publicly accessible physical connection would also be established to the river's shoreline from the Golf Course. A pedestrian sidewalk from hole 18 would link to the pathways near the East River shoreline within Ferry Point Park. This connection is still in the design phase, and any new connection to existing pedestrian infrastructure within Ferry Point Park would be reviewed and approved by NYC Parks.

With the Proposed Actions the public's use of waters held in public trust would not be affected. The Proposed Facility would be sited over 400 feet from the East River, and pretreatment and volume control of stormwater runoff prior to discharge would be required in accordance with NYCDEP's Unified Stormwater Rule, improving the quality of water discharged into surrounding waterbodies over existing conditions.

Thus, the Proposed Actions would promote Policy 8.5.

Policy 9: Protect scenic resources that contribute to the visual quality of the New York City coastal area.

Policy 9.1: Protect and improve visual quality associated with New York City's urban context and the historic and working waterfront.

The Park has expansive views of the East River, Westchester Creek, the Whitestone Bridge, and the Queens skyline. With the Proposed Development, views of these resources would not be altered along existing waterfront walking paths in Park areas

around the Proposed Development. Partial views of the East River from upland areas would continue to be available to visitors at the Development Site.

The Proposed Development would also provide new elevated waterfront views from the proposed publicly accessible areas of the rooftop, where views would be available to the East River, Westchester Creek, the Whitestone Bridge, and the Manhattan and Queens skylines. As discussed in Chapter 8 of the EIS, "Urban Design and Visual Resources," the Proposed Facility would not disrupt views of the East River from waterfront areas of the Park. The Proposed Facility also incorporates architectural features – such as rounded roof elements and a series of setbacks – that relate to the links-style Golf Course.

Accordingly, the Proposed Actions would maintain and enhance the site's visual connection to the waterfront.

Thus, the Proposed Development would promote Policy 9.1

Policy 9.2: Protect and enhance scenic values associated with natural resources.

The Proposed Development would not disturb the critical scenic values associated with the Park. The Development Site is physically and visually separate from the natural resources that comprise and contribute to the Special Natural Waterfront Area,[7] which are at a lower elevation than the Development Site and near the shoreline. The Development Site is more than 400 feet from the East River shoreline and contains the golf clubhouse, over six acres of surface parking or other paved areas above a former landfill.

The Proposed Facility has been designed to minimize its footprint within the park and preserve the majority of the 18 holes that comprise the Golf Course absent potential mitigation due to shadow impacts. The building was sited to maximize views of the East River, the waterfront, and the Manhattan and Queens skylines.

The Development Site is surrounded on three sides by the links-style Golf Course. The design of the building seeks to bring the undulating forms of the Golf Courses' dunes and the fluidity of the waterfront into the building form. These forms are pulled into and inform the design aesthetic, typified in architectural elements such as the curved forms at the roofline and the undulating wave element above the first floor on the south façade.

The mass of the building is kept low with a series of raised setbacks that reflect the elevation change of the links-style Golf Course. Back-of-house operations would be below the main floor, and truck loading areas have been designed to face the Whitestone Bridge to minimize the effects on views from the Park.

From the lobby on the main floor, views of hole 18 and beyond to the East River and the Queens skyline would be available. The building's façade has a high degree of transparency to reinforce waterfront views from within the Proposed Facility. The Park is unique for its open spaces and waterfront vistas, especially from the walking paths near the Park's waterfront. The Development Site is in an upland area that would not intrude into vistas of the waterfront from waterfront areas. Further, the Proposed Development would not change the continuity or configuration of the existing shoreline and associated waterfront vegetation.

[7] Defined by the NYC Waterfront Revitalization Program as "a large area with significant open spaces and concentrations of natural resources including wetlands, habitats, and buffer areas." These include the East River and Long Island Sound, Jamaica Bay, and Northwestern Staten Island Harbor Herons Area.

Accordingly, the Proposed Development would protect and enhance the scenic values associated with natural resources.

Thus, the Proposed Development would promote Policy 9.2.

NYC Waterfront Revitalization Program - Policy 6.2 Flood Elevation Workhsheet

COMPLETE INSTRUCTIONS ON HOW TO USE THIS WORKSHEET ARE PROVIDED IN THE "CLIMATE CHANGE ADAPTATION GUIDANCE" DOCUMENT AVAILABLE AT www.nyc.gov/wrp

Enter information about the project and site in highlighted cells in Tabs 1-3. Tab 4, "Summary Charts" contains primary results. Tab 5, "0.2%+SLR" produces charts to be used for critical infrastructure or facilities. Tab 6, "Calculations" contains background computations. Appendix A contains tide elevations for station across the city to be used for the elevation of MHHW if a site survey is not available. Non-highlighted cells have been locked.

Background Information	
Project Name	Bally's Bronx
Location	450 Hutchinson River Parkway, Bronx Block 5622, p/o Lot 1
Type(s)	☑ Residential, Commercial, Community Facility; ☑ Parkland, Open Space, and Natural Areas; ☐ Tidal Wetland Restoration; ☐ Critical Infrastructure or Facility; ☐ Industrial Uses; ☐ Over-water Structures; ☐ Shoreline Structures; ☐ Transportation; ☑ Wastewater Treatment/Drainage; ☑ Coastal Protection
Description	The Applicant, Bally's New York Operating Company, LLC, seeks a series of discretionary land use actions to facilitate the "Bally's Bronx" gaming and recreation facility (the "Proposed Facility") in the Throggs Neck neighborhood of Bronx Community District 10. The Proposed Facility would contain gaming space with food and beverage services, a hotel, an event center, retail, and a parking garage located on an approximately 18-acre parcel (the "Development Site") within Bally's Golf Links at Ferry Point, a 222-acre public golf course in the Bronx (the "Golf Course"). An approximately 40,160-gross-square-foot (gsf) replacement Golf Course clubhouse (the "golf clubhouse") would also be constructed.
Planned Completion Date	2030
Expected Project Lifespan	2100

The New York City Waterfront Revitalization Program Climate Change Adaptation Guidance document was developed by the NYC Department of City Planning. It is a guidance document only and is not intended to serve as a substitute for actual regulations. The City disclaims any liability for errors that may be contained herein and shall not be responsible for any damages, consequential or actual, arising out of or in connection with the use of this information. The City reserves the right to update or correct information in this guidance document at any time and without notice.

For technical assistance on using this worksheet, email wrp@planning.nyc.gov, using the message subject "Policy 6.2 Worksheet."

Last update: Sept. 7, 2018

Establish current tidal and flood heights.

	FT (NAVD88)	Feet	Datum	Source
MHHW	4.01	**4.01**	**NAVD88**	*Appendix A*
1% flood height	13.00	**13.00**	**NAVD88**	*Pfirm*
Design flood elevation	15.00	**15.00**	**NAVD88**	*Architectural Drawings*
As relevant:				
0.2% flood height	-->		**NAVD88**	

Data will be converted based on the following datums:

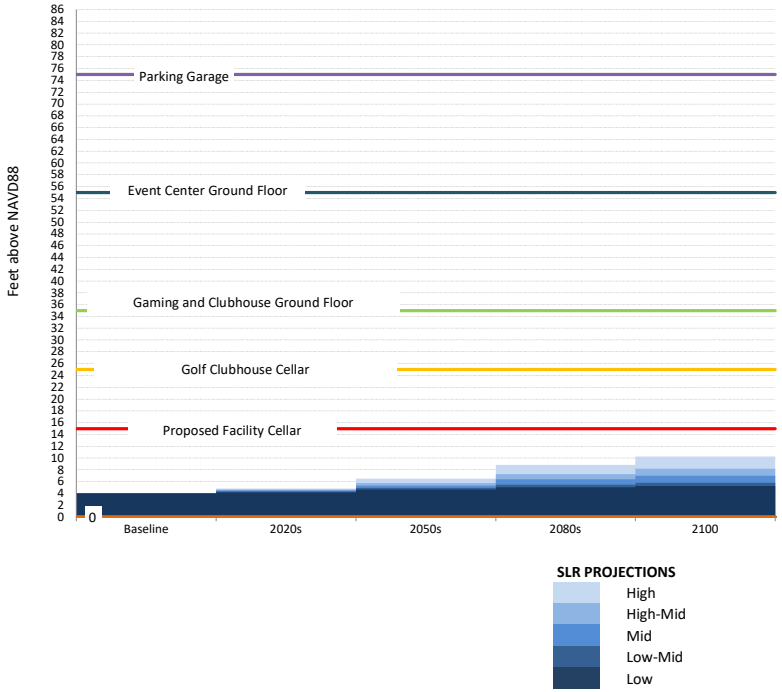
Datum	FT (NAVD88)
NAVD88	*0.00*
NGVD29	*-1.10*
Manhattan Datum	*1.65*
Bronx Datum	*1.51*
Brooklyn Datum (Sewer)	*0.61*
Brooklyn Datum (Highway)	*1.45*
Queens Datum	*1.63*
Richmond Datum	*2.09*

Describe key physical features of the project.

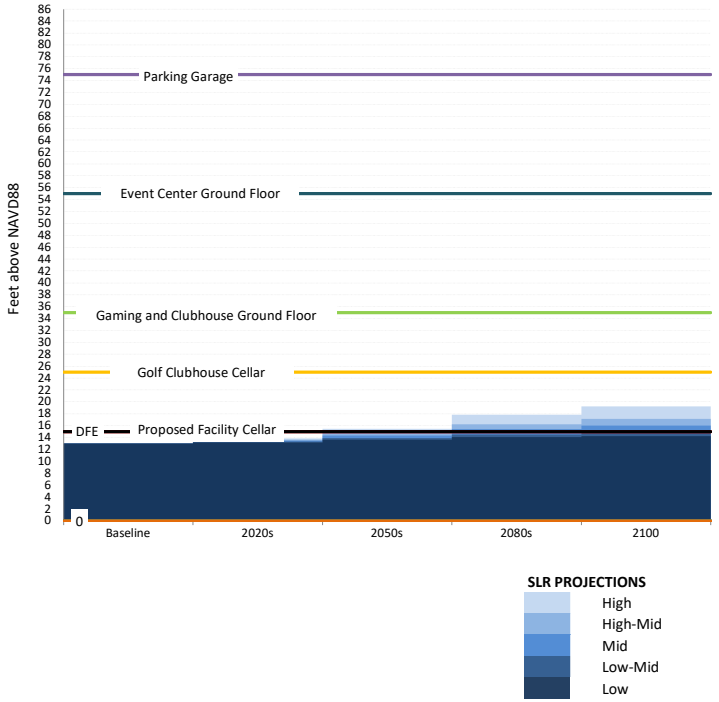
Feature *(enter name)*	Feature Category	Lifespan	Elevation	Units	Datum	Ft	Ft Above NAVD88	Ft Above MHHW	Ft Above 0.2% flood height
Proposed Facility Cellar	☑ Vulnerable ☑ Critical ☐ Potentially Hazardous ☐ Other	2100	15.0	Feet	NAVD88	*15.0*	*15.0*	*11.0*	*#VALUE!*
Back of House space, loading area, parking, and mechanical, electrical, and plumbing (MEP) space.									
Golf Clubhouse Cellar	☑ Vulnerable ☑ Critical ☐ Potentially Hazardous ☐ Other	2100	25.0	Feet	NAVD88	*25.0*	*25.0*	*21.0*	*#VALUE!*
Lockers, a lounge, and back-of-house space.									
Gaming and Clubhouse Ground Floor	☑ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other	2100	35.0	Feet	NAVD88	*35.0*	*35.0*	*31.0*	*#VALUE!*
Gaming floor, retail, and back of house space within the Proposed Facility. Office, pro-shop, and bar within the replacement golf clubhouse.									
Event Center Ground Floor	☑ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other	2100	55.0	Feet	NAVD88	*55.0*	*55.0*	*51.0*	*#VALUE!*
Event Center ground floor, gaming facility mezzanine, and hotel parking.									
Parking Garage	☑ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other	2100	75.0	Feet	NAVD88	*75.0*	*75.0*	*71.0*	*#VALUE!*
Garage parking space.									
	☐ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									
	☐ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									
	☐ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									

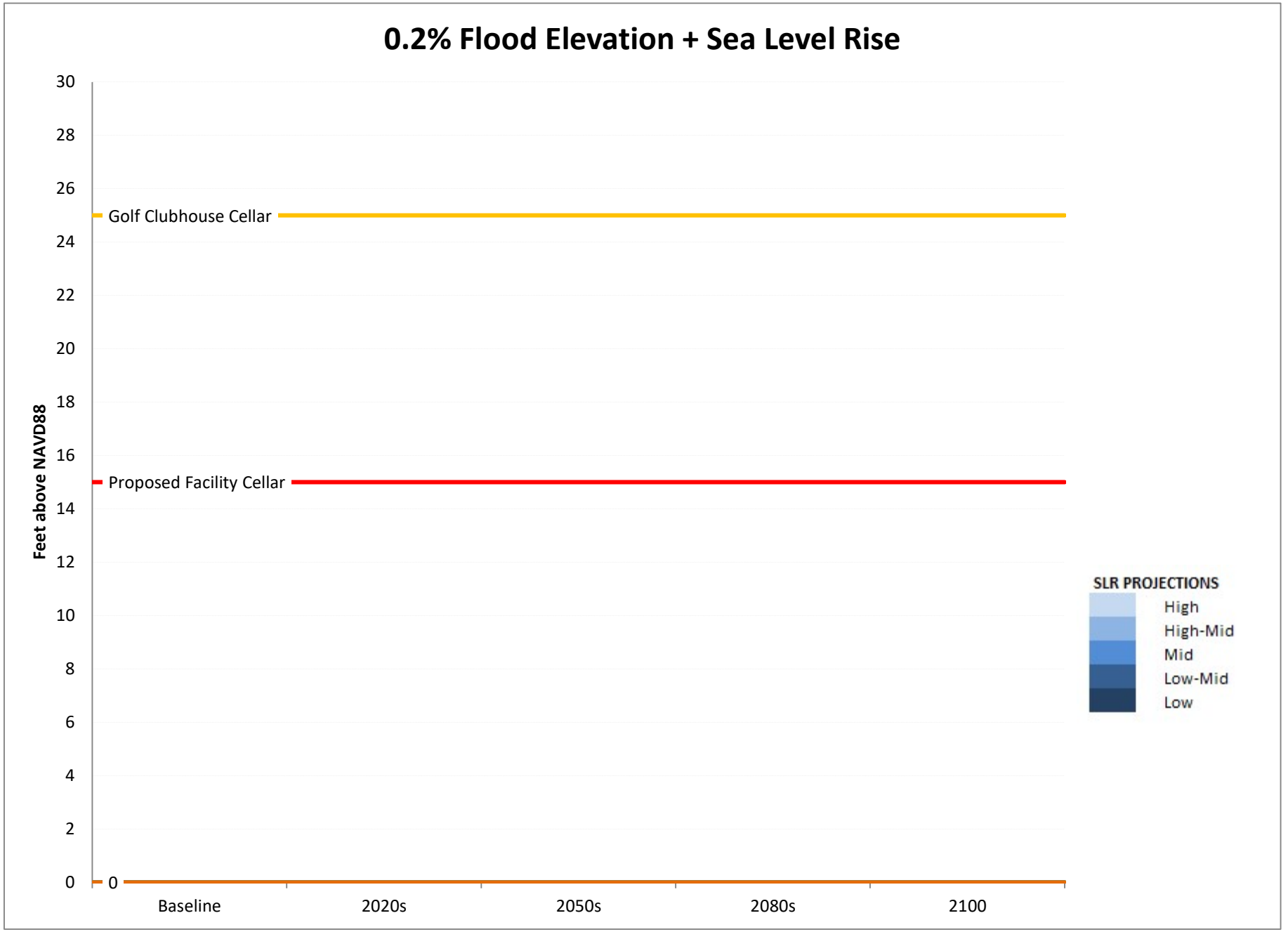
Assess project vulnerability over a range of sea level rise projections.

Mean Higher High Water + Sea Level Rise



1% Flood Elevation + Sea Level Rise




0.2% Flood Elevation + Sea Level Rise
Feet above NAVD88
30
28
26
24
22
20
18
16
14
12
10
8
6
4
2
0
Golf Clubhouse Cellar
Proposed Facility Cellar
0
Baseline
2020s
2050s
2080s
2100
SLR PROJECTIONS
High
High-Mid
Mid
Low-Mid
Low

	SLR (ft)					
	Low	**Low-Mid**	**Mid**	**High-Mid**	**High**	
Baseline	0.00	0.00	0.00	0.00	0.00	**2014**
2020s	0.17	0.33	0.50	0.67	0.83	**2020s**
2050s	0.67	0.92	1.33	1.75	2.50	**2050s**
2080s	1.08	1.50	2.42	3.25	4.83	**2080s**
2100	1.25	1.83	3.00	4.17	6.25	**2100**

	MHHW+SLR (ft above NAVD88)				
	Low	**Low-Mid**	**Mid**	**High-Mid**	**High**
Baseline	4.01	4.01	4.01	4.01	4.01
2020s	4.18	4.34	4.51	4.68	4.84
2050s	4.68	4.93	5.34	5.76	6.51
2080s	5.09	5.51	6.43	7.26	8.84
2100	5.26	5.84	7.01	8.18	10.26

	1%+SLR (ft above NAVD88)				
	Low	**Low-Mid**	**Mid**	**High-Mid**	**High**
Baseline	13.00	13.00	13.00	13.00	13.00
2020s	13.17	13.33	13.50	13.67	13.83
2050s	13.67	13.92	14.33	14.75	15.50
2080s	14.08	14.50	15.42	16.25	17.83
2100	14.25	14.83	16.00	17.17	19.25

	0.2%+SLR (ft above NAVD88)				
	Low	**Low-Mid**	**Mid**	**High-Mid**	**High**
Baseline	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2020s	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2050s	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2080s	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2100	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!

	0	1
Proposed Facility Cellar	15	15
Golf Clubhouse Cellar	25	25
Gaming and Clubhouse Groun	35	35
Event Center Ground Floor	55	55
Parking Garage	75	75
0	0	0
0	0	0
0	0	0
DFE	15.00	15.00

SLR (in)				
Low	**Low-Mid**	**Mid**	**High-Mid**	**High**
0	0	0	0	0
2	4	6	8	10
8	11	16	21	30
13	18	29	39	58
15	22	36	50	75

NOAA Tide Station Data

(to be used only when a site survey is unavailable)

Station ID	*Station Name*	*Source MHHW (Feet, NAVD88)**	*Adjusted MHHW (Feet, NAVD88)**
8518687	Queensboro Bridge	2.27	2.60
8530095	Alpine	2.11	2.44
8516614	Glen Cove	3.72	4.05
8516990	Willets Point	3.72	4.05
8518639	Port Morris	3.33	3.66
8518699	Williamsburg Bridge	2.14	2.47
8518750	The Battery	2.28	2.61
8531680	Sandy Hook	2.41	2.74
8518490	New Rochelle	3.71	4.04
8531545	Keyport	2.66	2.99
8516891	Norton Point	2.08	2.41
8517201	North Channel	2.72	3.05
8517137	Beach Channel	2.10	2.43
8517756	Kingsborough	2.13	2.46
8519436	Great Kills	2.22	2.55
8531142	Port Reading	2.82	3.15
8519483	Bergen Point	2.56	2.89
8519050	USCG	2.28	2.61
8518902	Dyckman St	2.01	2.34
8517251	Worlds Fair Marina	3.59	3.92
8518668	Horns Hook	2.54	2.87
8518643	Randalls Island	2.60	2.93
8518526	Throggs Neck	3.68	4.01

* MHHW values include an addition 0.33 feet to account for changes in sea level since the 1983-200

Source
NOAA Tides and Currents
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NOAA Tides and Currents
NOAA Tides and Currents
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)1 tidal epoch.




Alpine
8530095
New
Rochelle
8518490
Dyckman St
8518902
Glen Cove
8516614
Randalls
Island
8518643
Port
Morris
8518639
Throggs
Neck
8518526
Willets
Point
8516990
Worlds Fair
Marina
8517251
Queensboro
Bridge
8518687
Horns Hook
8518668
Williamsburg
Bridge
8518699
The Battery
8518750
North
Channel
8507201
Norton
Point
8516891
CG
9050
Beach
Channel
8517137
Kingsborough
8517756
Sandy Hook
8531680