Columbia Heights Rezoning
Environmental Assessment Statement

CEQR No. 26DCP094K

ULURP Nos. 260139ZMK, N260140ZRK

Lead Agency:
New York City Department of City Planning (DCP)
120 Broadway, 31st Floor
New York, NY 10271

Prepared by:
AKRF, Inc.
440 Park Avenue South, 7th floor
New York, NY 10016

February 10, 2026

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City Environmental Quality Review
ENVIRONMENTAL ASSESSMENT STATEMENT (EAS) FULL FORM

Please fill out and submit to the appropriate agency (see instructions)

Part I: GENERAL INFORMATION

PROJECT NAME Columbia Heights Rezoning

1. *Reference Numbers*

CEQR REFERENCE NUMBER (to be assigned by lead agency)	BSA REFERENCE NUMBER (if applicable)
26DCP094K	
ULURP REFERENCE NUMBER (if applicable)	OTHER REFERENCE NUMBER(S) (if applicable) (*e.g.*, legislative intro, CAPA)
260139ZMK, N260140ZRK	

2a. *Lead Agency Information*			**2b. *Applicant Information***		
NAME OF LEAD AGENCY			NAME OF APPLICANT		
Department of City Planning			25-30 Columbia Heights (Brooklyn), LLC		
NAME OF LEAD AGENCY CONTACT PERSON			NAME OF APPLICANT'S REPRESENTATIVE OR CONTACT PERSON		
Stephanie Shellooe			David Wellspring		
ADDRESS 120 Broadway			ADDRESS 540 Madison Avenue		
CITY New York	STATE NY	ZIP 10271	CITY New York	STATE NY	ZIP 10022
TELEPHONE 212-720-3328	EMAIL sshellooe@planning.nyc.gov		TELEPHONE 646-817-3492	EMAIL dwellspring@cimgroup.com	

3. *Action Classification and Type*

SEQRA Classification

☐ UNLISTED ☒ TYPE I: Specify Category (see 6 NYCRR 617.4 and NYC Executive Order 91 of 1977, as amended): 617.4(b)(6)(vi)

Action Type (refer to CEQR Technical Manual Chapter 2, "Establishing the Analysis Framework" for guidance)

☒ LOCALIZED ACTION, SITE SPECIFIC ☒ LOCALIZED ACTION, SMALL AREA ☐ GENERIC ACTION

4. *Project Description*

The Applicant, 25-30 Columbia Heights (Brooklyn), LLC, is seeking a zoning map amendment and a zoning text amendment to facilitate a mixed-use development including residential conversion and enlargement of two existing, underutilized commercial buildings (the "Proposed Development"). The zoning map amendment would rezone the existing M2-1 zoning district to a M1-5A/R10A and a M1-5A/R8A district and the zoning text amendment would establish a Special Mixed-Use District and amend Appendix F of the Zoning Resolution to establish the Project Area as a Mandatory Inclusionary Housing area (the "Proposed Actions"). The Project Area consists of Projected Development Site 1 (25 Columbia Heights; Block 204, Lot 1) and Projected Development Site 2 (30-58 Columbia Heights; Block 208, Lots 1, 2, and 12) and is generally bounded by Doughty, Furman, Columbia and Vine Streets in between the Brooklyn Heights and Dumbo neighborhoods of Community District 2 (the "Project Area").

The Proposed Development is comprised of a total of approximately 925,000 gross square feet (gsf) of development, with approximately 678,000 gsf dedicated to residential use (consisting of 661 total dwelling units, including approximately 133 to 199 affordable units depending on the MIH option selected), 186,000 gsf for commercial and/or community facility use, and 61,000 gsf for accessory residential parking (188 spaces).

A separate Reasoable Worst Case Development Scenario (RWCDS) was developed assuming full utilization of allowable FAR under the proposed zoning districts.

See the Draft Scope of Work for a full project description.

Project Location

BOROUGH Brooklyn	COMMUNITY DISTRICT(S) 2	STREET ADDRESS 25 and 30 Columbia Heights
TAX BLOCK(S) AND LOT(S) Block 204, Lot 1 and Block 208, Lots 1, 2 & 12		ZIP CODE 11201
DESCRIPTION OF PROPERTY BY BOUNDING OR CROSS STREETS Area generally bounded by Doughty, Furman, Columbia, and Vine Streets.		
EXISTING ZONING DISTRICT, INCLUDING SPECIAL ZONING DISTRICT DESIGNATION, IF ANY M2-1		ZONING SECTIONAL MAP NUMBER 12d

5. *Required Actions or Approvals* (check all that apply)

***City Planning Commission*:** ☒ YES ☐ NO ☒ UNIFORM LAND USE REVIEW PROCEDURE (ULURP)

☐ CITY MAP AMENDMENT ☐ ZONING CERTIFICATION ☐ CONCESSION
☒ ZONING MAP AMENDMENT ☐ ZONING AUTHORIZATION ☐ UDAAP
☒ ZONING TEXT AMENDMENT ☐ ACQUISITION—REAL PROPERTY ☐ REVOCABLE CONSENT
☐ SITE SELECTION—PUBLIC FACILITY ☐ DISPOSITION—REAL PROPERTY ☐ FRANCHISE
☐ HOUSING PLAN & PROJECT ☐ OTHER, explain:
☐ SPECIAL PERMIT (if appropriate, specify type: ☐ modification; ☐ renewal; ☐ other); EXPIRATION DATE:
SPECIFY AFFECTED SECTIONS OF THE ZONING RESOLUTION Appendix F & ZR Section 123-90

***Board of Standards and Appeals*:** ☐ YES ☒ NO

☐ VARIANCE (use)
☐ VARIANCE (bulk)
☐ SPECIAL PERMIT (if appropriate, specify type: ☐ modification; ☐ renewal; ☐ other); EXPIRATION DATE:
SPECIFY AFFECTED SECTIONS OF THE ZONING RESOLUTION

***Department of Environmental Protection*:** ☐ YES ☐ NO ☐ Cogeneration Facility ☐ Title V Permit

Other City Approvals Subject to CEQR (check all that apply)

☐ LEGISLATION ☐ FUNDING OF CONSTRUCTION, specify:
☐ RULEMAKING ☐ POLICY OR PLAN, specify:
☐ CONSTRUCTION OF PUBLIC FACILITIES ☐ FUNDING OF PROGRAMS, specify:
☐ 384(b)(4) APPROVAL ☐ PERMITS, specify:
☐ OTHER, explain:

Other City Approvals Not Subject to CEQR (check all that apply)

☐ PERMITS FROM DOT'S OFFICE OF CONSTRUCTION MITIGATION AND COORDINATION (OCMC) ☐ LANDMARKS PRESERVATION COMMISSION APPROVAL
☐ OTHER, explain:

***State or Federal Actions/Approvals/Funding*:** ☐ YES ☒ NO If "yes," specify:

6. *Site Description:* *The directly affected area consists of the project site and the area subject to any change in regulatory controls. Except where otherwise indicated, provide the following information with regard to the directly affected area.*

***Graphics*:** *The following graphics must be attached and each box must be checked off before the EAS is complete. Each map must clearly depict the boundaries of the directly affected area or areas and indicate a 400-foot radius drawn from the outer boundaries of the project site. Maps may not exceed 11 x 17 inches in size and, for paper filings, must be folded to 8.5 x 11 inches.*

☒ SITE LOCATION MAP ☒ ZONING MAP ☒ SANBORN OR OTHER LAND USE MAP
☒ TAX MAP ☐ FOR LARGE AREAS OR MULTIPLE SITES, A GIS SHAPE FILE THAT DEFINES THE PROJECT SITE(S)
☒ PHOTOGRAPHS OF THE PROJECT SITE TAKEN WITHIN 6 MONTHS OF EAS SUBMISSION AND KEYED TO THE SITE LOCATION MAP

Physical Setting (both developed and undeveloped areas)

Total directly affected area (sq. ft.): 101,720 Waterbody area (sq. ft.) and type:
Roads, buildings, and other paved surfaces (sq. ft.): 101,720 Other, describe (sq. ft.):

7. *Physical Dimensions and Scale of Project* (if the project affects multiple sites, provide the total development facilitated by the action)

SIZE OF PROJECT TO BE DEVELOPED (gross square feet): 1,005,480 gsf
NUMBER OF BUILDINGS: 5 GROSS FLOOR AREA OF EACH BUILDING (sq. ft.): 460,570 & 544,910
HEIGHT OF EACH BUILDING (ft.): 210 & 205 NUMBER OF STORIES OF EACH BUILDING: 17 & 19

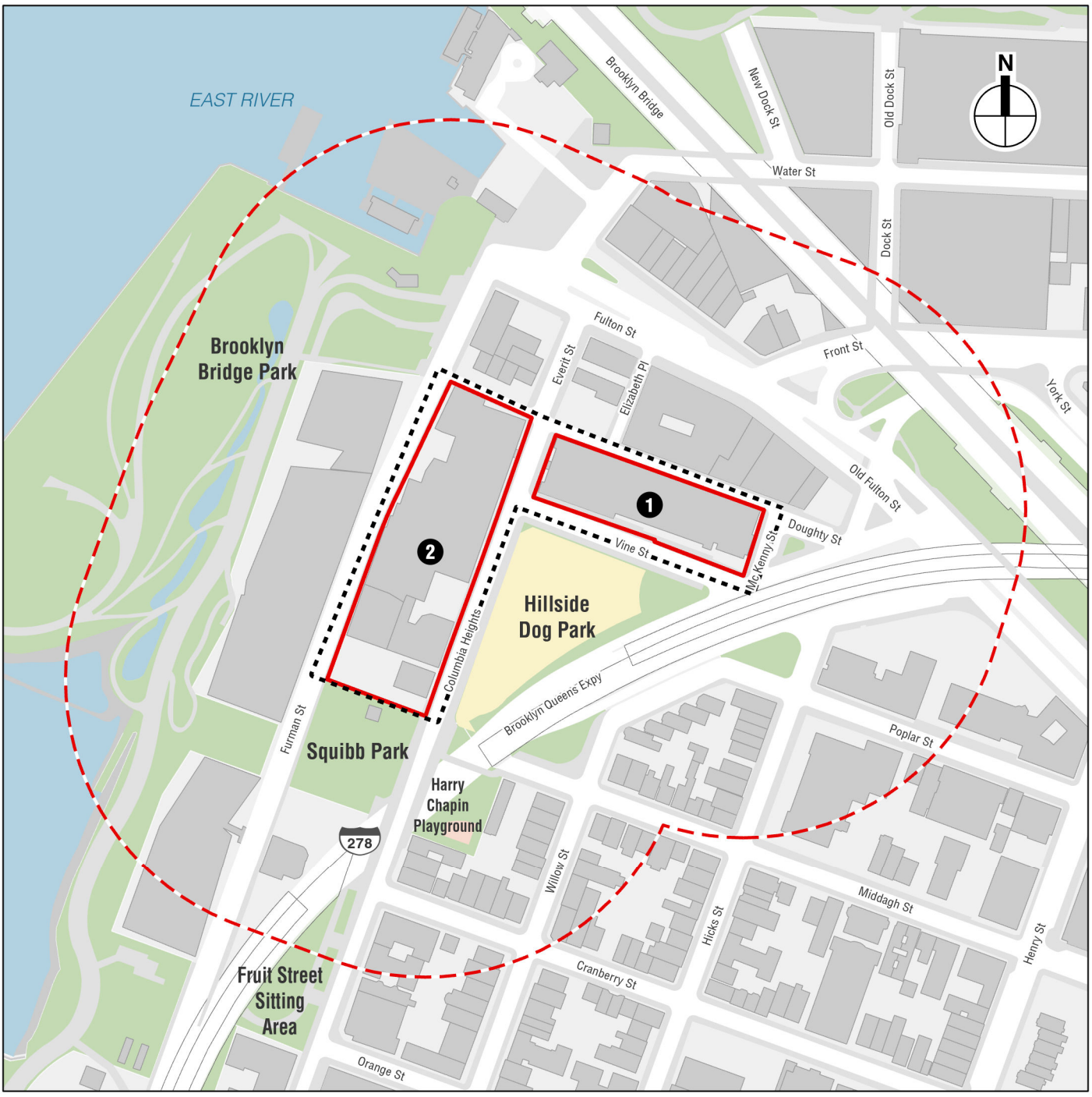
Does the proposed project involve changes in zoning on one or more sites? ☒ YES ☐ NO
If "yes," specify: The total square feet owned or controlled by the applicant: 101,720
The total square feet not owned or controlled by the applicant:

Does the proposed project involve in-ground excavation or subsurface disturbance, including, but not limited to foundation work, pilings, utility lines, or grading? ☒ YES ☐ NO
If "yes," indicate the estimated area and volume dimensions of subsurface disturbance (if known):
AREA OF TEMPORARY DISTURBANCE: TBD sq. ft. (width x length) VOLUME OF DISTURBANCE: TBD cubic ft. (width x length x depth)
AREA OF PERMANENT DISTURBANCE: TBD sq. ft. (width x length)

8. *Analysis Year* CEQR Technical Manual Chapter 2

ANTICIPATED BUILD YEAR (date the project would be completed and operational): 2029
ANTICIPATED PERIOD OF CONSTRUCTION IN MONTHS: 31
WOULD THE PROJECT BE IMPLEMENTED IN A SINGLE PHASE? ☒ YES ☐ NO IF MULTIPLE PHASES, HOW MANY?
BRIEFLY DESCRIBE PHASES AND CONSTRUCTION SCHEDULE: Estimated sequencing as follows: 25 Columbia Heights: 31-month construction

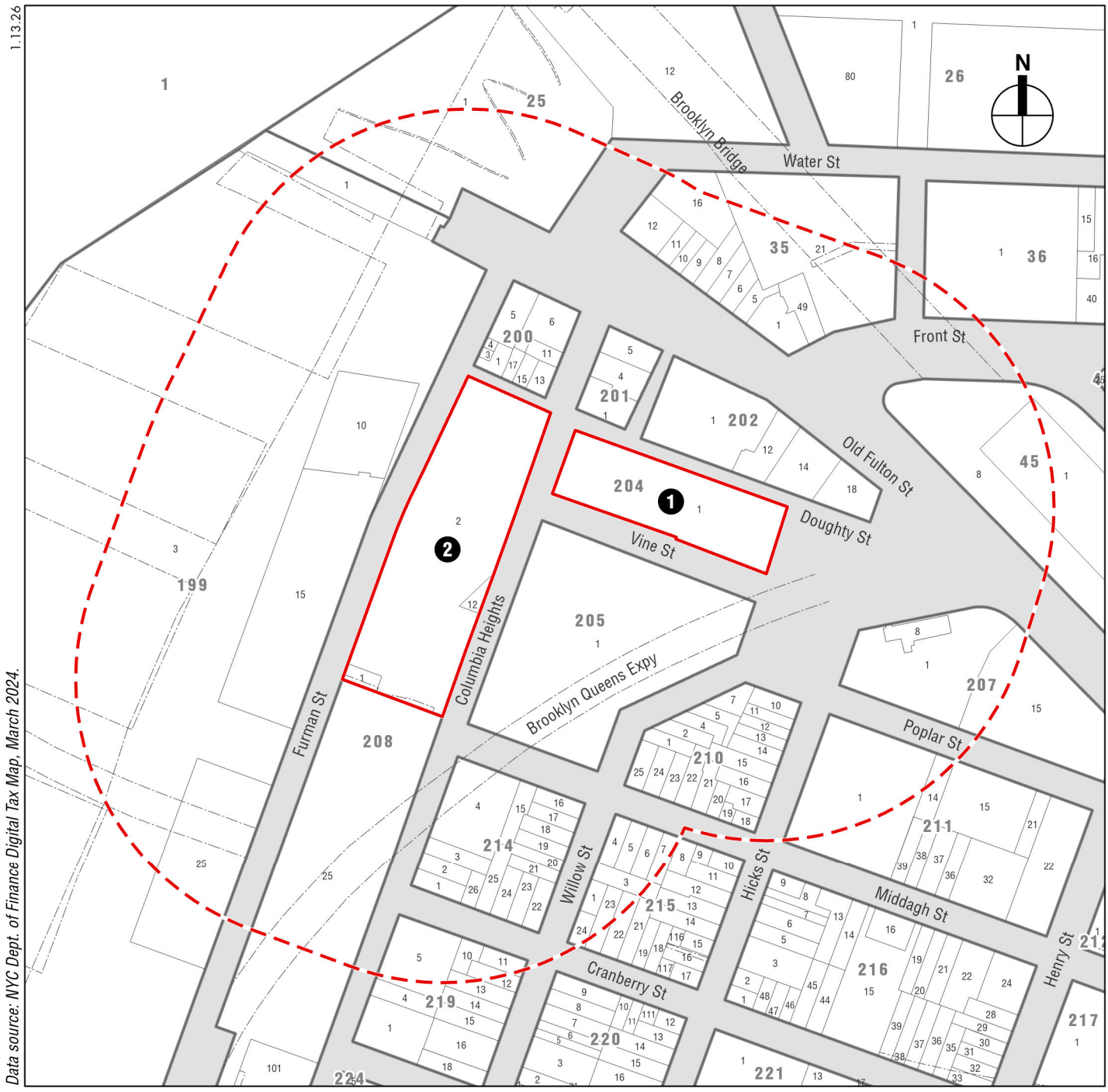
1.13.26



Project Location

COLUMBIA HEIGHTS REZONING

Figure 1



Project Area

1 *Projected Development Site*

Study Area (400-foot perimeter)

1 *Tax Lot Boundary*

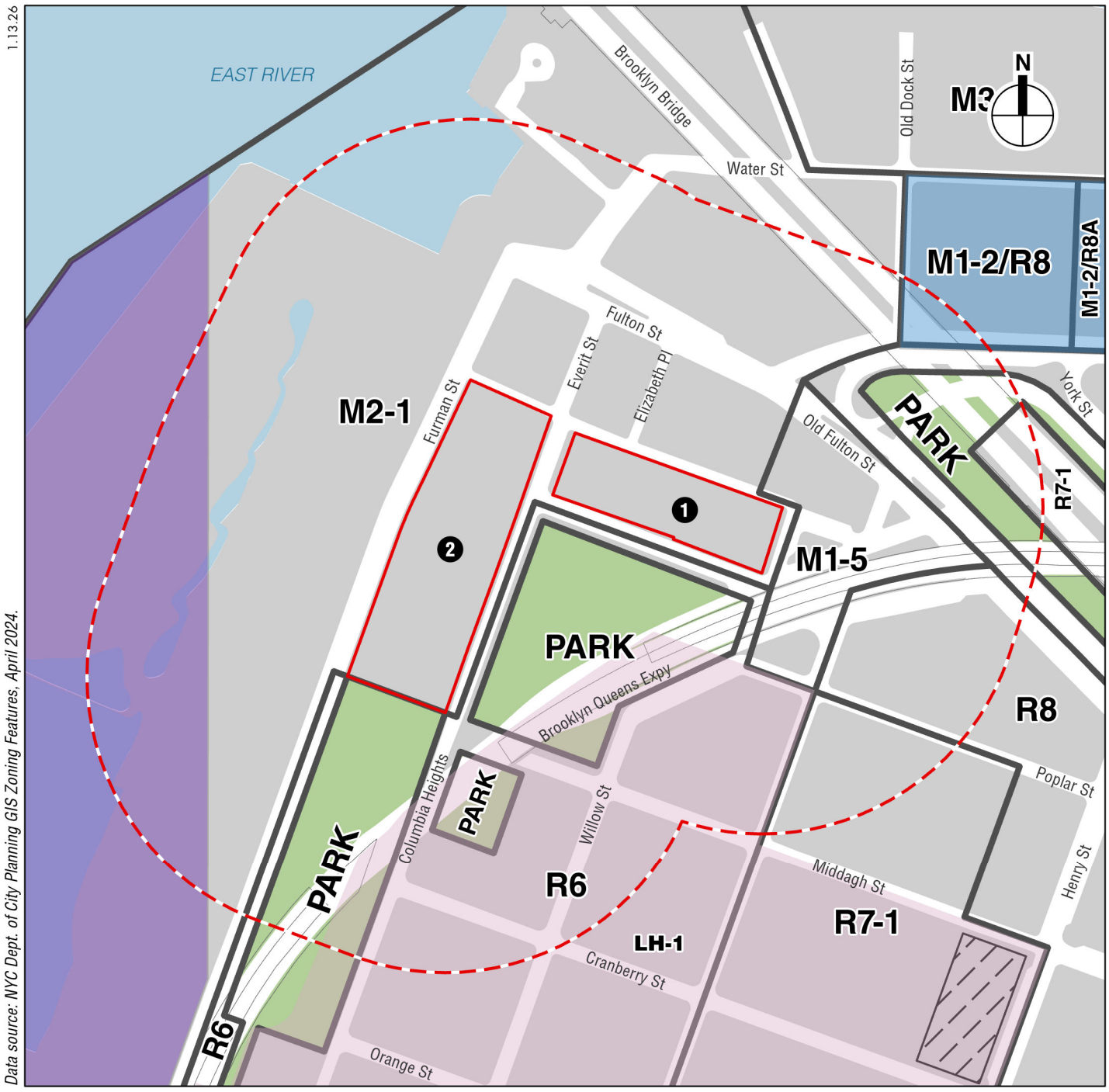
Tax Block Boundary

Other Boundary

Tax Map

COLUMBIA HEIGHTS REZONING

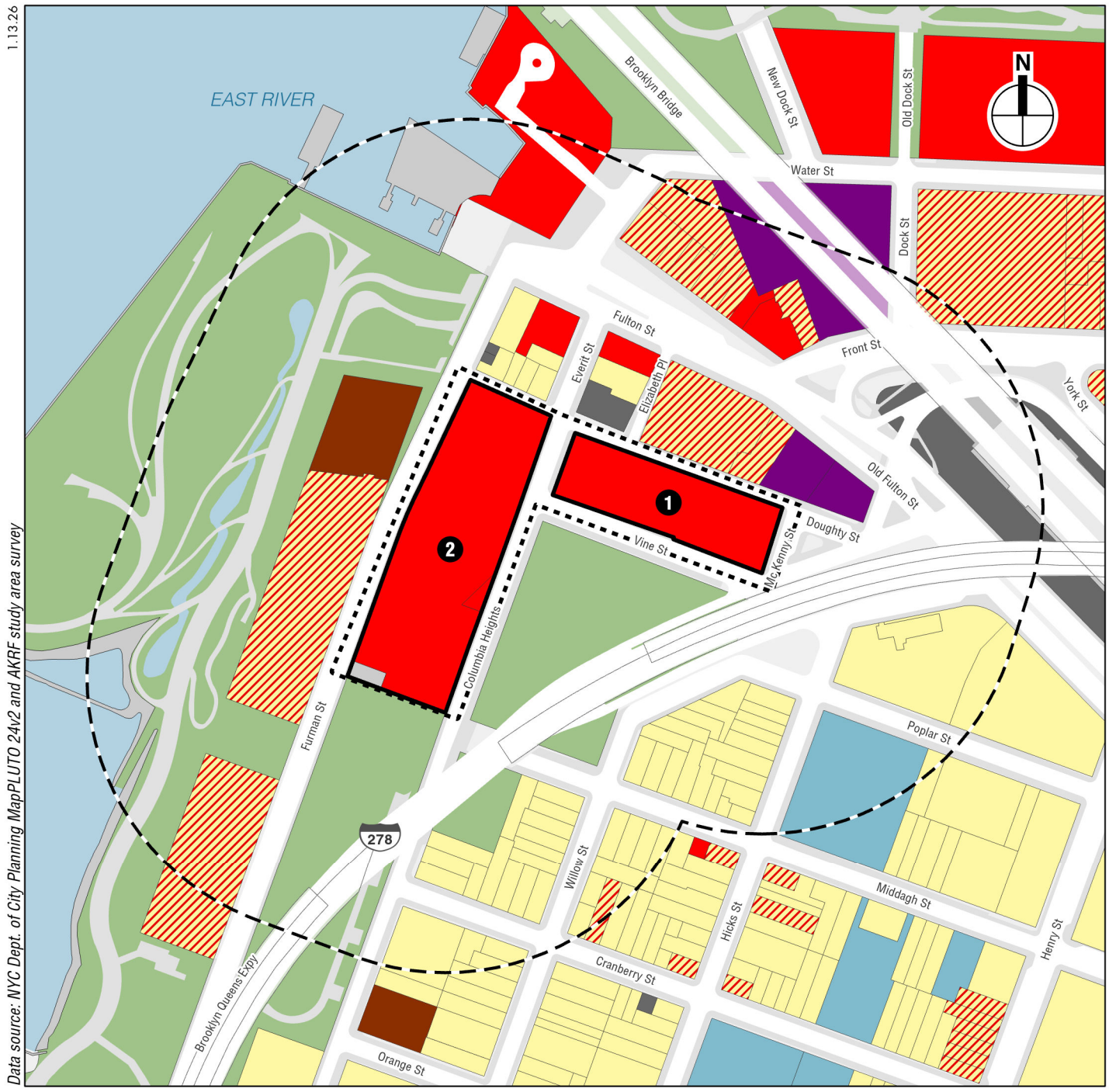
Figure 2



Existing Zoning

COLUMBIA HEIGHTS REZONING

Figure 3a



Existing Land Use

COLUMBIA HEIGHTS REZONING

Figure 3b

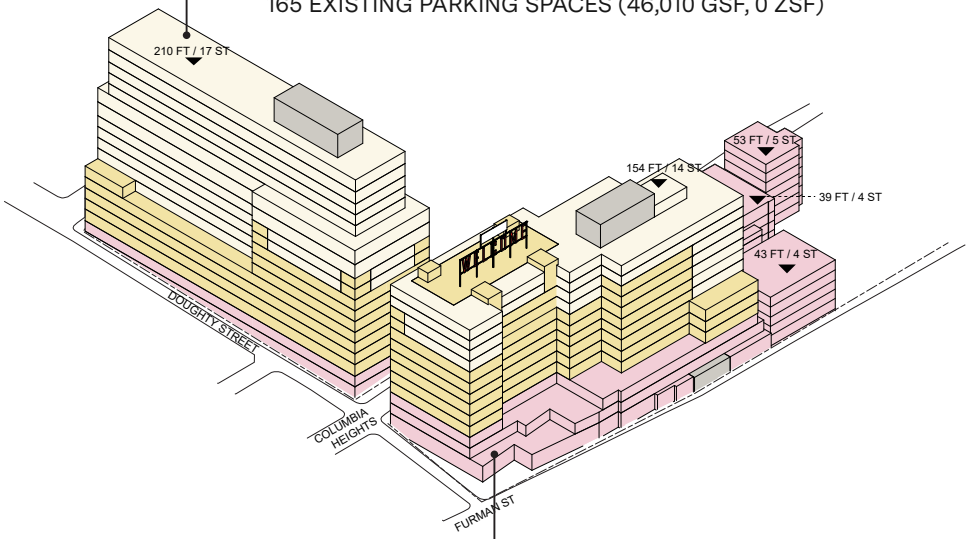
25 Columbia Heights

12.00 FAR - PROPOSED

460,570 GSF (379,510 ZSF)

14,850 GSF (12,240 ZSF) COMMERCIAL
399,710 GSF (367,270 ZSF) RESIDENTIAL

165 EXISTING PARKING SPACES (46,010 GSF, 0 ZSF)



Current Proposed
M1-5A/R10A (25 CH)
M1-5A/R8A (30 CH)

30 Columbia Heights

6.11 FAR - PROPOSED

464,710 GSF (428,060 ZSF)

171,320 GSF (167,570 ZSF) COMMERCIAL
278,390 GSF (260,490 ZSF) RESIDENTIAL

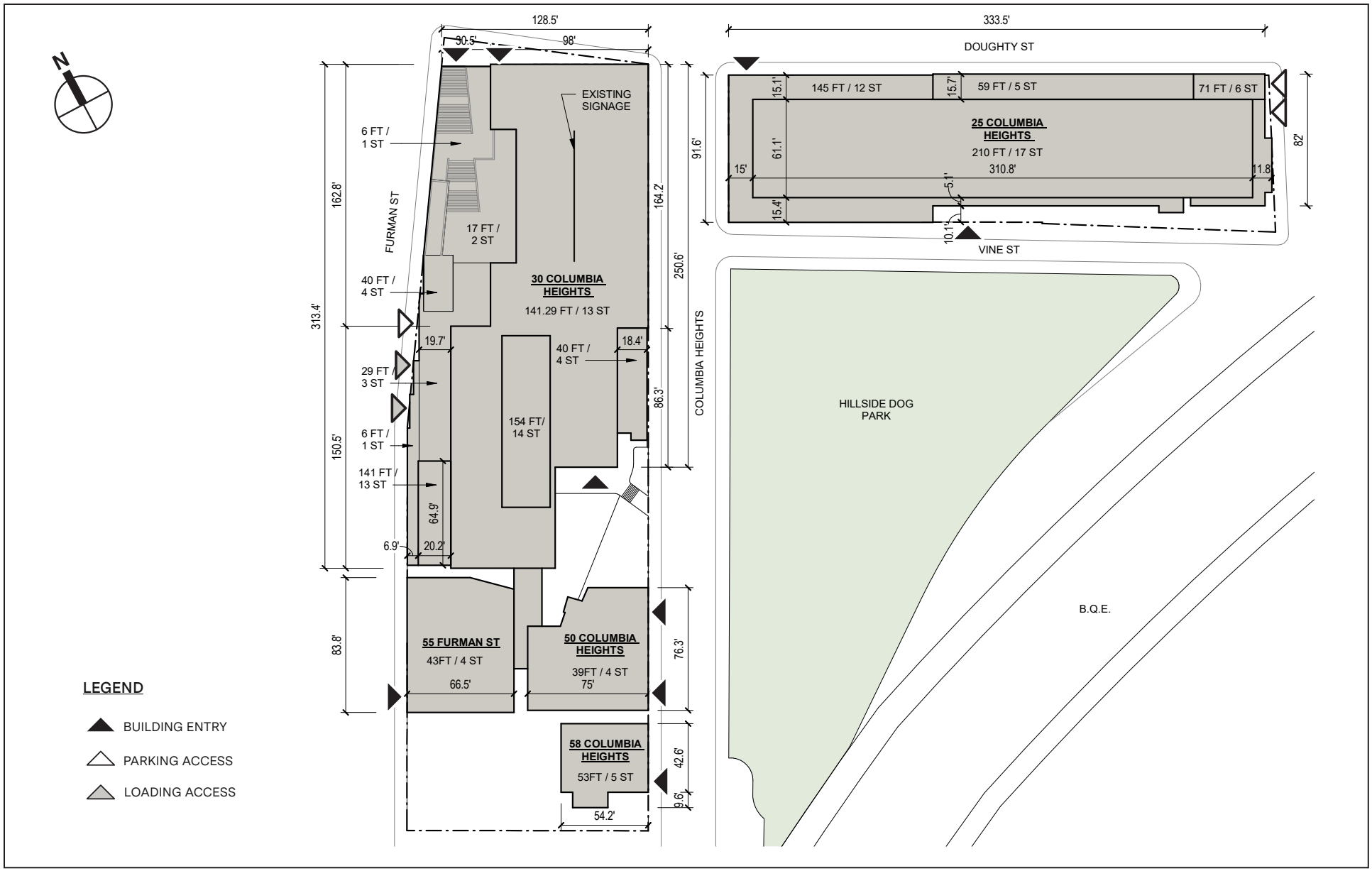
23 PARKING SPACES PROVIDED (15,000 GSF, 0 ZSF)

LEGEND

- RESIDENTIAL CONVERSION
- RESIDENTIAL ENLARGEMENT
- COMMERCIAL / COMMUNITY FACILITY
- MECH/BOH

Source: Morris Adjmi Architects

Proposed Massing

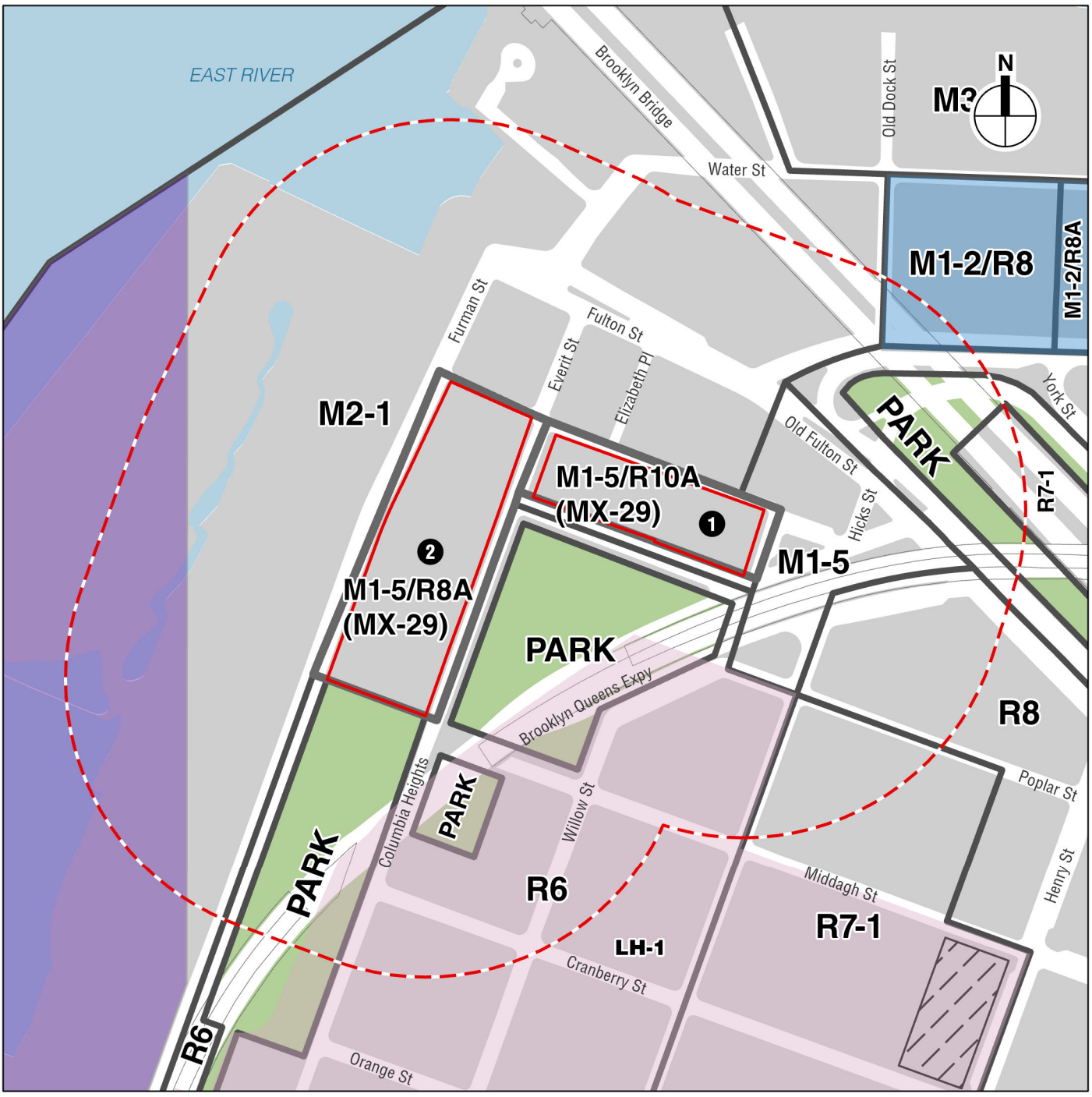


Source: Morris Adjmi Architects

Proposed Site Plan

Figure 4b

1.13.26



Project Area
Projected Development Site
Study Area (400-foot perimeter)
Zoning District Boundary
C1-5
Limited Height District
Special Mixed Use District (MX-2)
Special Scenic View District
Park Boundary

0 400 FEET

Proposed Zoning

COLUMBIA HEIGHTS REZONING

Figure 5

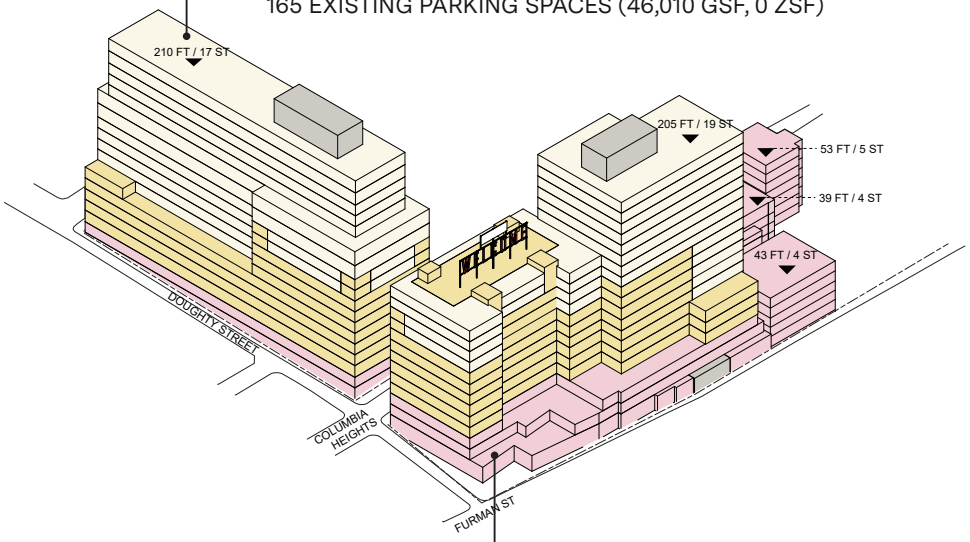
25 Columbia Heights

12.00 FAR - PROPOSED

460,570 GSF (379,510 ZSF)

14,850 GSF (12,240 ZSF) COMMERCIAL
399,710 GSF (367,270 ZSF) RESIDENTIAL

165 EXISTING PARKING SPACES (46,010 GSF, 0 ZSF)



Current Proposed
M1-5A/R10A (25 CH)
M1-5A/R8A (30 CH)

30 Columbia Heights

7.2 FAR - RWCDS

544,910 GSF (504,450 ZSF)

171,320 GSF (167,570 ZSF) COMMERCIAL
358,590 GSF (336,890 ZSF) RESIDENTIAL

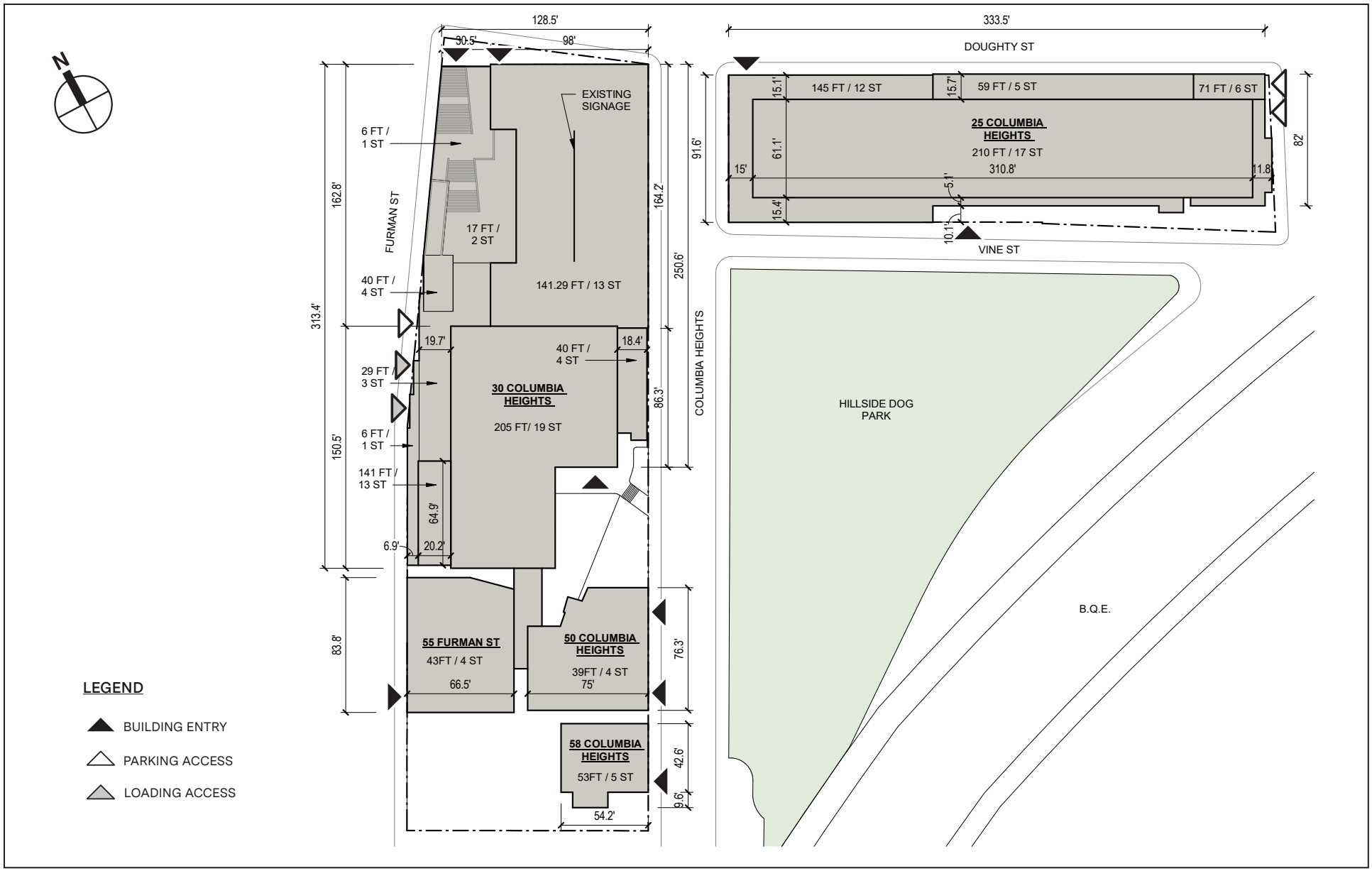
23 PARKING SPACES PROVIDED (15,000 GSF. 0 ZSF)

LEGEND

- RESIDENTIAL CONVERSION
- RESIDENTIAL ENLARGEMENT
- COMMERCIAL / COMMUNITY FACILITY
- MECH/BOH

Source: Morris Adjmi Architects

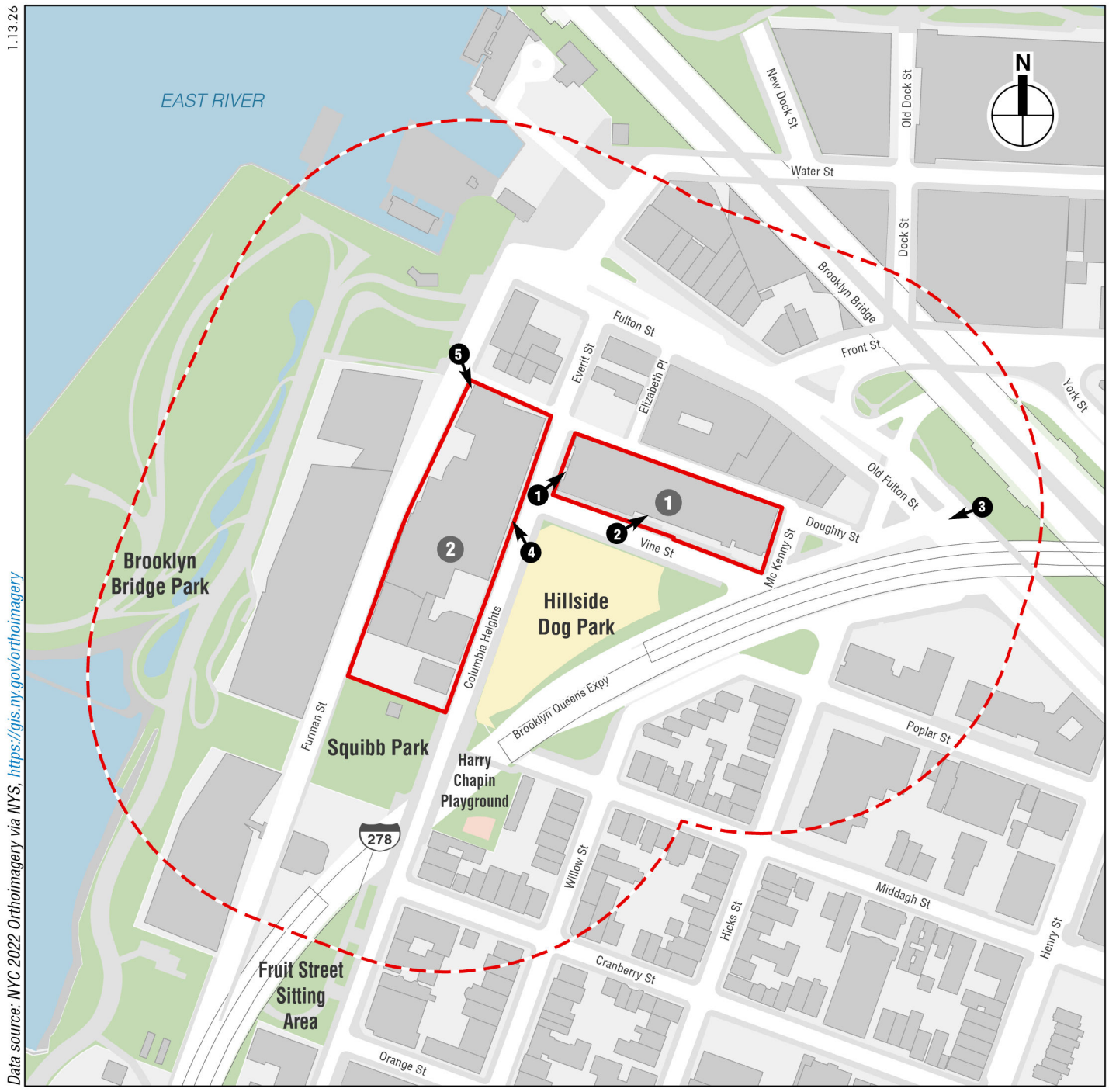
RWCDS Massing



Source: Morris Adjmi Architects

RWCDS Site Plan

Figure 6b



Key to Photographs

COLUMBIA HEIGHTS REZONING

Figure 7



25 Columbia Heights, view northeast from Columbia Heights at Vine Street **1**



25 Columbia Heights, eastern addition, view northeast from Vine Street **2**



25 Columbia Heights, eastern addition, view southwest from Old Fulton Street **3**

Development Site Photographs



30 Columbia Heights, view northwest from Columbia Heights and Vine Street **4**



30 Columbia Heights, view southeast from Doughty and Furman Streets **5**

Development Site Photographs

duration, including 6 months of selective demolition, 5 months of foundation work, 7 months of superstructure, and 22 months of interior fitout (there would be overlap of the duration of these activities). 30 Columbia Heights: 30-month construction duration, including 2 months of selective demolition, 4 months of foundation work, 4 months of superstructure, and 20 months of interior fitout (there would be overlap of the duration of these activities).

9. *Predominant Land Use in the Vicinity of the Project* (check all that apply)

☒ RESIDENTIAL ☐ MANUFACTURING ☒ COMMERCIAL ☒ PARK/FOREST/OPEN SPACE ☒ OTHER, specify: Automotive, light-industrial

DESCRIPTION OF EXISTING AND PROPOSED CONDITIONS

The information requested in this table applies to the directly affected area. The directly affected area consists of the project site and the area subject to any change in regulatory control. The increment is the difference between the No-Action and the With-Action conditions.

	EXISTING CONDITION	NO-ACTION CONDITION	WITH-ACTION CONDITION	INCREMENT
LAND USE				
Residential	☐ YES ☒ NO	☐ YES ☒ NO	☒ YES ☐ NO	
If "yes," specify the following:				
Describe type of residential structures			Multi-Family	
No. of dwelling units			716	+716
No. of low- to moderate-income units			144-216	+144-216
Gross floor area (sq. ft.)			758,300	+758,300
Commercial	☒ YES ☐ NO	☒ YES ☐ NO	☒ YES ☐ NO	
If "yes," specify the following:				
Describe type (retail, office, other)	Retail and Office	Retail and Office	Retail and Office	
Gross floor area (sq. ft.)	695,000	695,000	186,170	-508,830
Manufacturing/Industrial	☐ YES ☒ NO	☐ YES ☒ NO	☐ YES ☒ NO	
If "yes," specify the following:				
Type of use				
Gross floor area (sq. ft.)				
Open storage area (sq. ft.)				
If any unenclosed activities, specify:				
Community Facility	☐ YES ☒ NO	☐ YES ☒ NO	☐ YES ☒ NO	
If "yes," specify the following:				
Type				
Gross floor area (sq. ft.)				
Vacant Land	☐ YES ☒ NO	☐ YES ☒ NO	☐ YES ☐ NO	
If "yes," describe:				
Publicly Accessible Open Space	☐ YES ☒ NO	☐ YES ☒ NO	☐ YES ☒ NO	
If "yes," specify type (mapped City, State, or Federal parkland, wetland—mapped or otherwise known, other):				
Other Land Uses	☐ YES ☒ NO	☐ YES ☒ NO	☐ YES ☒ NO	
If "yes," describe:				
PARKING				
Garages	☒ YES ☐ NO	☒ YES ☐ NO	☒ YES ☐ NO	
If "yes," specify the following:				
No. of public spaces	125	125	0	-125 public
No. of accessory spaces	0	0	165+23=188	+188 accessory
Operating hours	24 hours	24 hours	24 hours	
Attended or non-attended	Attended	Attended	Attended	
Lots	☐ YES ☒ NO	☐ YES ☒ NO	☐ YES ☒ NO	
If "yes," specify the following:				
No. of public spaces				
No. of accessory spaces				
Operating hours				
Other (includes street parking)	☐ YES ☒ NO	☐ YES ☒ NO	☐ YES ☒ NO	
If "yes," describe:				
POPULATION				
Residents	☐ YES ☒ NO	☐ YES ☒ NO	☒ YES ☐ NO	
If "yes," specify number:			1,446	+1,446
Briefly explain how the number of residents was calculated:	Community District average household size (2020 Census) of 2.02 per DCP's Population FactFinder			

	EXISTING CONDITION	NO-ACTION CONDITION	WITH-ACTION CONDITION	INCREMENT
Businesses	☒ YES ☐ NO	☒ YES ☐ NO	☒ YES ☐ NO	
If "yes," specify the following:				
No. and type		Retail and Office	Retail	
No. and type of workers by business		2,596	745	-1,752
No. and type of non-residents who are not workers				
Briefly explain how the number of businesses was calculated:				
Other (students, visitors, concert-goers, *etc.*)	☐ YES ☒ NO	☐ YES ☒ NO	☐ YES ☒ NO	
If any, specify type and number:				
Briefly explain how the number was calculated:				
ZONING				
Zoning classification	M2-1	M2-1	M1-5A/R10A (MX), M1-5A/R8A (MX)	
Maximum amount of floor area that can be developed	203,440	203,440	874,408	+670,968
Predominant land use and zoning classifications within land use study area(s) or a 400 ft. radius of proposed project	Residential, Commerical, Open Space, Automotive, Light-Industrial, Transportation/Utility	Residential, Commercial, Open Space, Automotive, Light-Industrial, Transportation/Utility	Residential, Commerical, Open Space, Automotive, Light-Industrial, Transportation/Utility	
Attach any additional information that may be needed to describe the project. If your project involves changes that affect one or more sites not associated with a specific development, it is generally appropriate to include total development projections in the above table and attach separate tables outlining the reasonable development scenarios for each site.				

Part II: TECHNICAL ANALYSIS

INSTRUCTIONS: For each of the analysis categories listed in this section, assess the proposed project's impacts based on the thresholds and criteria presented in the CEQR Technical Manual. Check each box that applies.

- If the proposed project can be demonstrated not to meet or exceed the threshold, check the "no" box.
- If the proposed project will meet or exceed the threshold, or if this cannot be determined, check the "yes" box.
- For each "yes" response, provide additional analyses (and, if needed, attach supporting information) based on guidance in the CEQR Technical Manual to determine whether the potential for significant impacts exists. Please note that a "yes" answer does not mean that an EIS must be prepared—it means that more information may be required for the lead agency to make a determination of significance.
- The lead agency, upon reviewing Part II, may require an applicant to provide additional information to support the Full EAS Form. For example, if a question is answered "no," an agency may request a short explanation for this response.

	YES	NO
1. *LAND USE, ZONING, AND PUBLIC POLICY*: CEQR Technical Manual Chapter 4		
(a) Would the proposed project result in a change in land use and/or zoning different from the surrounding area?	☒	☐
(b) Is there the potential to affect an applicable public policy?	☐	☒
(c) If "yes," to (a) and/or, (b), complete a preliminary assessment and attach. See DSOW & EAS Att B		
(d) Is the project a large, publicly sponsored project?	☐	☒
○ If "yes," complete a OneNYC assessment and attach.		
(e) Is any part of the directly affected area within the City's Waterfront Revitalization Program boundaries?	☒	☐
○ If "yes," complete the Consistency Assessment Form. See DSOW & EAS Att B		
2. *SOCIOECONOMIC CONDITIONS*: CEQR Technical Manual Chapter 5		
(a) Would the proposed project:		
○ Generate a net increase of more than 250 residential units?	☒	☐
▪ If "yes," answer *both* questions 2(b)(ii) below.		
○ Generate a net increase of more than 200,000 square feet of commercial space?	☐	☒
▪ If "yes," answer question 2(b)(iv) below.		
○ Directly displace 500 or more existing residents?	☐	☒
▪ If "yes," answer questions 2(b)(i), 2(b)(ii), and 2(b)(iv) below.		
○ Directly displace more than 100 existing employees or an unusually important business as defined in the chapter?	☐	☒
▪ If "yes," answer questions under 2(b)(iii) and 2(b)(iv) below.		
○ Create a retail concentration?	☐	☒
▪ If "yes," answer question 2(b)(v) below.		
○ Affect conditions in a specific industry?	☐	☒
▪ If "yes," answer question 2(b)(vi) below.		
(b) If "yes" to any of the above, attach supporting information to answer the relevant questions below. If "no" was checked for each category above, the remaining questions in this technical area do not need to be answered.		
i. Direct Residential Displacement		
○ If more than 500 residents would be displaced, would these residents represent more than 5% of the primary study area population?	☐	☐
○ If "yes," is the average income of the directly displaced population markedly lower than the average income of the rest of the study area population?	☐	☐
ii. Indirect Residential Displacement		
○ Would the population of the primary study area increase by more than 10 percent or is there the potential to increase or accelerate trends toward increasing rents?	☐	☒
iii. Direct Business Displacement		
○ Do any of the displaced businesses provide goods or services essential to the local economy that otherwise would not be found within the trade area, either under existing conditions or in the future with the proposed project?	☐	☐
○ If "yes," is any category of business to be displaced the subject of other regulations or publicly adopted plans to preserve, enhance, or otherwise protect it?	☐	☐
iv. Indirect Business Displacement		

	YES	NO
○ Would the project potentially introduce trends that make it difficult for businesses that provide products or services essential to the local economy to remain in the area?	☐	☐
○ Would the project displace a use that either directly supports businesses in the area or brings a customer base to the area for local businesses?	☐	☐
v. Indirect Business Displacement due to Retail Market Saturation		
○ Would the project capture retail sales in a particular category of goods to the extent that the market for such goods would become saturated, potentially resulting in vacancies and disinvestment on neighborhood commercial streets?	☐	☐
vi. Adverse Effects on Specific Industries		
○ Would the project significantly affect business conditions in any industry or any category of businesses within or outside the study area?	☐	☐
○ Would the project indirectly substantially reduce employment or impair the economic viability in the industry or category of businesses?	☐	☐
3. *COMMUNITY FACILITIES*: CEQR Technical Manual Chapter 6		
(a) Direct Effects		
○ Would the project directly eliminate, displace, or alter public or publicly funded community facilities such as educational facilities, libraries, health care facilities, day care centers, police stations, or fire stations?	☐	☒
(b) Indirect Effects		
○ **Early Childhood Programs:** Would the project result in 20 or more eligible children under age 6, based on the number of low or low/moderate income residential units? (See Table 6-1 in Chapter 6)	☒	☐
○ **Public Schools:** Would the project result in 100 or more elementary or middle school students, or 150 or more high school students based on number of residential units? (See Table 6-1 in Chapter 6)	☐	☒
○ **Libraries:** Would the project result in a 5 percent or more increase in the ratio of residential units to library branches? (See Table 6-1 in Chapter 6)	☐	☒
○ **Healthcare Facilities and Fire/Police Protection**: Would the project result in the introduction of a sizeable new neighborhood?	☐	☒
4. *OPEN SPACE*: CEQR Technical Manual Chapter 7		
(a) Would the project change or eliminate existing open space?	☐	☒
(b) Would the project generate a net increase of more than 175 residential units in an existing R1-R4 district or 250 units in an existing R5 or above, C, or M district?	☒	☐
(c) Would the project generate more 500 additional employees?	☐	☒
5. *SHADOWS*: CEQR Technical Manual Chapter 8		
(a) Would the proposed project result in with-action structures of 250 feet or more?	☐	☒
(b) Would the proposed project result in with-action structures between 50-250 feet and be located adjacent to, within, or across the street from a sunlight-sensitive resource?	☒	☐
(c) Would the proposed project result in greater than 50 feet of incremental height change or substantial changes in bulk?	☒	☐
(d) If "yes" to any of the above questions, attach supporting information explaining whether the project's shadow would reach any sunlight-sensitive resource at any time of the year. See EAS Attachment F		
6. *HISTORIC AND CULTURAL RESOURCES*: CEQR Technical Manual Chapter 9		
(a) Does the proposed project site or an adjacent site contain any architectural and/or archaeological resource that is eligible for or has been designated (or is calendared for consideration) as a New York City Landmark, Interior Landmark or Scenic Landmark; that is listed or eligible for listing on the New York State or National Register of Historic Places; or that is within a designated or eligible New York City, New York State or National Register Historic District? (See the GIS System for Archaeology and National Register to confirm)	☒	☐
(b) Would the proposed project involve construction resulting in in-ground disturbance to an area not previously excavated?	☐	☒
(c) If "yes" to either of the above, list any identified architectural and/or archaeological resources and attach supporting information on whether the proposed project would potentially affect any architectural or archeological resources. See EAS Attachment G		
7. *URBAN DESIGN AND VISUAL RESOURCES*: CEQR Technical Manual Chapter 10		
(a) Would the proposed project result in a building over 250 feet tall, have a project area greater than 1.5 acres, or be classified as a general large-scale development?	☒	☐
(b) Does the project require a special permit to allow the modification of bulk and yard requirements or special uses?	☐	☒
(c) Does the proposed project introduce new, or change the location of, streets or public open spaces?	☐	☒
(d) Would the proposed project result in obstruction of publicly accessible views to visual resources not currently allowed by existing zoning?	☐	☒
(e) If "yes" to either of the above, please provide the information requested in Chapter 10. See EAS Attachment H		

	YES	NO
8. *NATURAL RESOURCES*: CEQR Technical Manual Chapter 11		
(a) Does the proposed project site or a site adjacent to the project contain natural resources as defined in Section 100 of Chapter 11?	☐	☒
○ If "yes," list the resources and attach supporting information on whether the project would affect any of these resources.		
(b) Is any part of the directly affected area within the Jamaica Bay Watershed?	☐	☒
○ If "yes," complete the Jamaica Bay Watershed Protection Plan Project Tracking Form and submit according to its instructions.		
9. *HAZARDOUS MATERIALS*: CEQR Technical Manual Chapter 12		
(a) Would the proposed project allow commercial or residential uses in an area that is currently, or was historically, a manufacturing area that involved hazardous materials?	☒	☐
(b) Would the proposed project introduce new activities or processes using hazardous materials and increase the risk of human or environmental exposure?	☐	☒
(c) Does the proposed project site have existing institutional controls (*e.g.*, (E) designation or Restrictive Declaration) relating to hazardous materials that preclude the potential for significant adverse impacts?	☐	☒
(d) Would the project require soil disturbance in a manufacturing area or any development on or near a manufacturing area or existing/historic facilities listed in the Hazardous Materials Appendix (including nonconforming uses)?	☒	☐
(e) Would the project result in the development of a site where there is reason to suspect the presence of hazardous materials, contamination, illegal dumping or fill, or fill material of unknown origin?	☐	☒
(f) Would the project result in development on or near a site that has or had underground and/or aboveground storage tanks (*e.g.*, gas stations, oil storage facilities, heating oil storage)?	☒	☐
(g) Would the project result in renovation of interior existing space on a site with the potential for compromised air quality; vapor intrusion from either on-site or off-site sources; or the presence of asbestos, PCBs, mercury or lead-based paint?	☒	☐
(h) Would the project result in development on or near a site with potential hazardous materials issues such as government-listed voluntary cleanup/brownfield site, current or former power generation/transmission facilities, coal gasification or gas storage sites, railroad tracks or rights-of-way, or municipal incinerators?	☐	☒
(i) Has a Phase I Environmental Site Assessment been performed for the site?	☒	☐
○ If "yes," were Recognized Environmental Conditions (RECs) identified? Briefly identify: See EAS Attachment I	☒	☐
(j) Based on the Phase I Assessment, is a Phase II Investigation needed? See EAS Attachment I	☒	☐
10. *WATER AND SEWER INFRASTRUCTURE*: CEQR Technical Manual Chapter 13		
(a) Would the project result in water demand of more than one million gallons per day?	☐	☒
(b) If the proposed project located in a combined sewer area, would it result in at least 1,000 residential units or 250,000 square feet or more of commercial space in Manhattan, or at least 400 residential units or 150,000 square feet or more of commercial space in the Bronx, Brooklyn, Staten Island, or Queens?	☒	☐
(c) If the proposed project located in a separately sewered area, would it result in the same or greater development than that listed in Table 13-1 in Chapter 13?	☐	☐
(d) Would the project involve development on a site that is 5 acres or larger where the amount of impervious surface would increase?	☐	☒
(e) If the project is located within the Jamaica Bay Watershed or in certain specific drainage areas, including Bronx River, Coney Island Creek, Flushing Bay and Creek, Gowanus Canal, Hutchinson River, Newtown Creek, or Westchester Creek, would it involve development on a site that is 1 acre or larger where the amount of impervious surface would increase?	☐	☐
(f) Would the proposed project be located in an area that is partially sewered or currently unsewered?	☐	☒
(g) Is the project proposing an industrial facility or activity that would contribute industrial discharges to a Wastewater Treatment Plant and/or contribute contaminated stormwater to a separate storm sewer system?	☐	☒
(h) Would the project involve construction of a new stormwater outfall that requires federal and/or state permits?	☐	☒
(i) If "yes" to any of the above, conduct the appropriate preliminary analyses and attach supporting documentation. See EAS Attachment J		
11. *SOLID WASTE AND SANITATION SERVICES*: CEQR Technical Manual Chapter 14		
(a) Using Table 14-1 in Chapter 14, the project's projected operational solid waste generation is estimated to be (pounds per week): 73,517		
○ Would the proposed project have the potential to generate 100,000 pounds (50 tons) or more of solid waste per week?	☐	☒
(b) Would the proposed project involve a reduction in capacity at a solid waste management facility used for refuse or recyclables generated within the City?	☐	☒
○ If "yes," would the proposed project comply with the City's Solid Waste Management Plan?	☐	☐
12. *ENERGY*: CEQR Technical Manual Chapter 15		
(a) Using energy modeling or Table 15-1 in Chapter 15, the project's projected energy use is estimated to be (annual BTUs): 136.3		
(b) Would the proposed project affect the transmission or generation of energy?	☐	☒

	YES	NO
13. *TRANSPORTATION*: CEQR Technical Manual Chapter 16		
(a) Would the proposed project exceed any threshold identified in Table 16-1 in Chapter 16?	☒	☐
(b) If "yes," conduct the appropriate screening analyses, attach back up data as needed for each stage, and answer the following questions:		
○ Would the proposed project result in 50 or more Passenger Car Equivalents (PCEs) per project peak hour?	☐	☒
If "yes," would the proposed project result in 50 or more vehicle trips per project peak hour at any given intersection? ***It should be noted that the lead agency may require further analysis of intersections of concern even when a project generates fewer than 50 vehicles in the peak hour. See Subsection 313 of Chapter 16 for more information.*	☐	☐
○ Would the proposed project result in more than 200 subway/rail, bus trips, or 50 Citywide Ferry Service ferry trips per project peak hour?	☐	☒
If "yes," would the proposed project result, per project peak hour, in 50 or more bus trips on a single line (in one direction), 200 subway/rail trips per station or line, or 25 or more Citywide Ferry Service ferry trips on a single route (in one direction), or 50 or more passengers at a Citywide Ferry Service landing?	☐	☐
○ Would the proposed project result in more than 200 pedestrian trips per project peak hour?	☒	☐
If "yes," would the proposed project result in more than 200 pedestrian trips per project peak hour to any given pedestrian or transit element, crosswalk, subway stair, bus stop, or Citywide Ferry Service landing?	☐	☒
14. *AIR QUALITY*: CEQR Technical Manual Chapter 17		
(a) *Mobile Sources*: Would the proposed project result in the conditions outlined in Section 210 in Chapter 17?	☒	☐
(b) *Stationary Sources*: Would the proposed project result in the conditions outlined in Section 220 in Chapter 17?	☒	☐
○ If "yes," would the proposed project exceed the thresholds in Figure 17-3, Stationary Source Screen Graph in Chapter 17? (Attach graph as needed) See DSOW	☐	☒
(c) Does the proposed project involve multiple buildings on the project site?	☒	☐
(d) Does the proposed project require federal approvals, support, licensing, or permits subject to conformity requirements?	☐	☒
(e) Does the proposed project site have existing institutional controls (*e.g.*, (E) designation or Restrictive Declaration) relating to air quality that preclude the potential for significant adverse impacts?	☐	☒
(f) If "yes" to any of the above, conduct the appropriate analyses and attach any supporting documentation. See DSOW		
15. *GREENHOUSE GAS EMISSIONS*: CEQR Technical Manual Chapter 18		
(a) Is the proposed project a city capital project or a power generation plant?	☐	☒
(b) Would the proposed project fundamentally change the City's solid waste management system?	☐	☒
(c) Would the proposed project result in the development of 350,000 square feet or more?	☒	☐
(d) If "yes" to any of the above, would the project require a GHG emissions assessment based on guidance in Chapter 18?	☒	☐
○ If "yes," would the project result in inconsistencies with the City's GHG reduction goal? (See Local Law 22 of 2008; § 24-803 of the Administrative Code of the City of New York). Please attach supporting documentation. See DSOW	☐	☐
16. *NOISE*: CEQR Technical Manual Chapter 19		
(a) Would the proposed project generate or reroute vehicular traffic?	☒	☐
(b) Would the proposed project introduce new or additional receptors (see Section 114 in Chapter 19) near heavily trafficked roadways, within one horizontal mile of an existing or proposed flight path, or within 1,500 feet of an existing or proposed rail line with a direct line of site to that rail line?	☒	☐
(c) Would the proposed project cause a stationary noise source to operate within 1,500 feet of a receptor with a direct line of sight to that receptor or introduce receptors into an area with high ambient stationary noise?	☒	☐
(d) Does the proposed project site have existing institutional controls (*e.g.*, (E) designation or Restrictive Declaration) relating to noise that preclude the potential for significant adverse impacts?	☐	☒
(e) If "yes" to any of the above, conduct the appropriate analyses and attach any supporting documentation. See DSOW		
17. *PUBLIC HEALTH*: CEQR Technical Manual Chapter 20		
(a) Based upon the analyses conducted, do any of the following technical areas require a detailed analysis: Air Quality; Hazardous Materials; Noise?	☒	☐
(b) If "yes," explain why an assessment of public health is or is not warranted based on the guidance in Chapter 20, "Public Health." Attach a preliminary analysis, if necessary. See DSOW		
18. *NEIGHBORHOOD CHARACTER*: CEQR Technical Manual Chapter 21		
(a) Based upon the analyses conducted, do any of the following technical areas require a detailed analysis: Land Use, Zoning, and Public Policy; Socioeconomic Conditions; Open Space; Historic and Cultural Resources; Urban Design and Visual Resources; Shadows; Transportation; Noise?	☒	☐
(b) If "yes," explain why an assessment of neighborhood character is or is not warranted based on the guidance in Chapter 21, "Neighborhood		

	YES	NO
Character." Attach a preliminary analysis, if necessary.		
19. *CONSTRUCTION*: CEQR Technical Manual Chapter 22		
(a) Would the project's construction activities involve:		
○ Construction activities lasting longer than two years?	☒	☐
○ Construction activities within a Central Business District or along an arterial highway or major thoroughfare?	☒	☐
○ Closing, narrowing, or otherwise impeding traffic, transit, or pedestrian elements (roadways, parking spaces, bicycle routes, sidewalks, crosswalks, corners, *etc.*)?	☒	☐
○ Construction of multiple buildings where there is a potential for on-site receptors on buildings completed before the final build-out?	☒	☐
○ The operation of several pieces of diesel equipment in a single location at peak construction?	☒	☐
○ Closure of a community facility or disruption in its services?	☐	☒
○ Activities within 400 feet of a historic or cultural resource?	☒	☐
○ Disturbance of a site containing or adjacent to a site containing natural resources?	☐	☒
○ Construction on multiple development sites in the same geographic area, such that there is the potential for several construction timelines to overlap or last for more than two years overall?	☒	☐

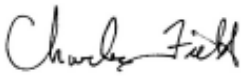
(b) If any boxes are checked "yes," explain why a preliminary construction assessment is or is not warranted based on the guidance in Chapter 22, "Construction." It should be noted that the nature and extent of any commitment to use the Best Available Technology for construction equipment or Best Management Practices for construction activities should be considered when making this determination.

Because the construction duration of the proposed project is anticipated to be greater than two years, would involve the construction activities at multiple buildings, and the construction activities would occur in proximity to sensitive receptors (i.e., residences), an assessment of construction will be prepared as part of the EIS (see DSOW).

20. *APPLICANT'S CERTIFICATION*

I swear or affirm under oath and subject to the penalties for perjury that the information provided in this Environmental Assessment Statement (EAS) is true and accurate to the best of my knowledge and belief, based upon my personal knowledge and familiarity with the information described herein and after examination of the pertinent books and records and/or after inquiry of persons who have personal knowledge of such information or who have examined pertinent books and records.

Still under oath, I further swear or affirm that I make this statement in my capacity as the applicant or representative of the entity that seeks the permits, approvals, funding, or other governmental action(s) described in this EAS.

APPLICANT/REPRESENTATIVE NAME	SIGNATURE	DATE
Charles Fields, AKRF		2/5/2026

PLEASE NOTE THAT APPLICANTS MAY BE REQUIRED TO SUBSTANTIATE RESPONSES IN THIS FORM AT THE DISCRETION OF THE LEAD AGENCY SO THAT IT MAY SUPPORT ITS DETERMINATION OF SIGNIFICANCE.

Part III: DETERMINATION OF SIGNIFICANCE (To Be Completed by Lead Agency)

INSTRUCTIONS: In completing Part III, the lead agency should consult 6 NYCRR 617.7 and 43 RCNY § 6-06 (Executive Order 91 or 1977, as amended), which contain the State and City criteria for determining significance.

1. For each of the impact categories listed below, consider whether the project may have a significant adverse effect on the environment, taking into account its (a) location; (b) probability of occurring; (c) duration; (d) irreversibility; (e) geographic scope; and (f) magnitude.

IMPACT CATEGORY	Potentially Significant Adverse Impact: YES	NO
Land Use, Zoning, and Public Policy	☒	☐
Socioeconomic Conditions	☐	☒
Community Facilities and Services	☐	☒
Open Space	☐	☒
Shadows	☐	☒
Historic and Cultural Resources	☐	☒
Urban Design/Visual Resources	☐	☒
Natural Resources	☐	☒
Hazardous Materials	☒	☐
Water and Sewer Infrastructure	☐	☒
Solid Waste and Sanitation Services	☐	☒
Energy	☐	☒
Transportation	☒	☐
Air Quality	☒	☐
Greenhouse Gas Emissions	☒	☐
Noise	☒	☐
Public Health	☒	☐
Neighborhood Character	☒	☐
Construction	☒	☐

2. Does the project have the potential to disproportionately affect disadvantaged communities, or cause or increase a disproportionate pollution burden on a disadvantaged community. ☒ YES ☐ NO

3. Are there any aspects of the project relevant to the determination of whether the project may have a significant impact on the environment, such as combined or cumulative impacts, that were not fully covered by other responses and supporting materials? ☒ YES ☐ NO

If there are such impacts, attach an explanation stating whether, as a result of them, the project may have a significant impact on the environment.

4. Check determination to be issued by the lead agency:

☒ **Positive Declaration**: If the lead agency has determined that the project may have a significant impact on the environment, and if a Conditional Negative Declaration is not appropriate, then the lead agency issues a *Positive Declaration* and prepares a draft Scope of Work for the Environmental Impact Statement (EIS).

☐ **Conditional Negative Declaration:** A *Conditional Negative Declaration* (CND) may be appropriate if there is a private applicant for an Unlisted action AND when conditions imposed by the lead agency will modify the proposed project so that no significant adverse environmental impacts would result. The CND is prepared as a separate document and is subject to the requirements of 6 NYCRR Part 617.

☐ **Negative Declaration:** If the lead agency has determined that the project would not result in potentially significant adverse environmental impacts, then the lead agency issues a *Negative Declaration*. The *Negative Declaration* may be prepared as a separate document (see template) or using the embedded Negative Declaration on the next page.

5. ***LEAD AGENCY'S CERTIFICATION***

TITLE Deputy Director, Environmental Assessment and Review Division	LEAD AGENCY Department of City Planning on behalf of City Planning Commission
NAME Evren Ulker-Kacar, AICP	DATE February 10. 2026
SIGNATURE Evren Ulker Kacar	

Attachment A: Project Description and Additional Information

This Environmental Assessment Statement (EAS) and the Draft Scope of Work for the Environmental Impact Statement (EIS) for the Proposed Actions needed to facilitate the Columbia Heights Rezoning project (the "Proposed Development") are being prepared in accordance with New York City Environmental Quality Review (CEQR). All analyses have been prepared in accordance with the methodologies presented in the 2025 *CEQR Technical Manual*. Tasks associated with each technical analysis are also described in the Draft Scope of Work. The Draft Scope of Work provides a detailed project description, including information regarding the Proposed Actions and Proposed Development.

A. PROJECT DESCRIPTION

The Applicant, 25-30 Columbia Heights (Brooklyn), LLC is seeking a zoning map amendment and an associated zoning text amendment to facilitate a mixed-use development consisting of a partial residential conversion and enlargement of two existing, underutilized commercial buildings (the "Proposed Development") located on two adjacent blocks (collectively, the "Development Site" or "Project Area") in Community District 2 of Brooklyn. As described in greater detail below, the reasonable worst case development scenario (RWCDS) assessed in this EAS includes approximately 1,005,480 gsf of total development, consisting of approximately 758,300 gsf of new residential space (approximately 716 total dwelling units, of which approximately 179 would be permanently affordable units in accordance with the Applicant's preferred Option 1 of the MIH Program[1]), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

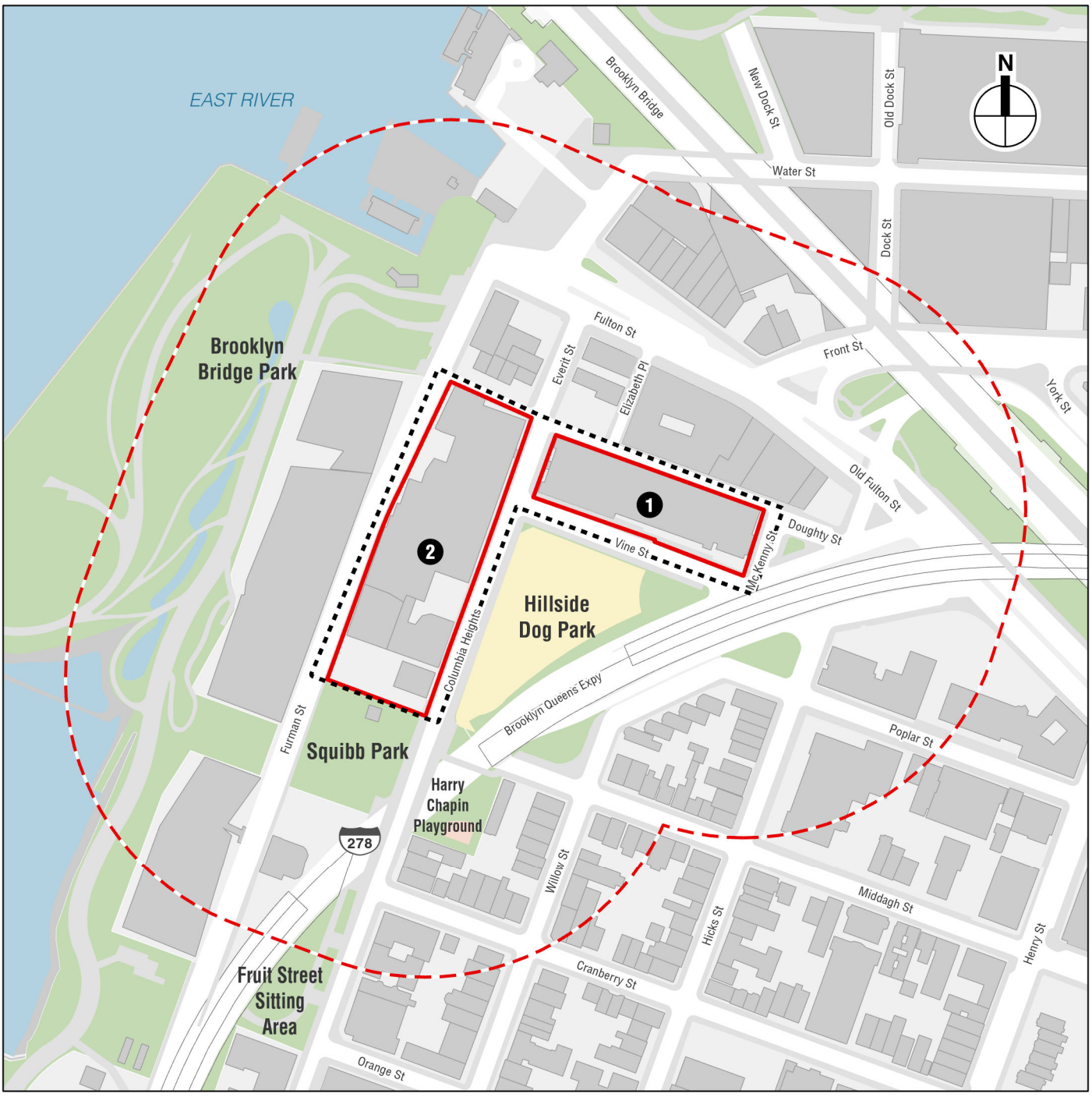
PROJECT AREA

The Project Area (see **Figure A-1**) consists of (i) Projected Development Site 1, a parcel located at 25 Columbia Heights (Block 204, Lot 1), comprising the block bounded by Columbia Heights, Vine Street, McKenny Street, and Doughty Street, and (ii) Projected Development Site 2, parcels located at 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12), comprising the block bounded by Columbia Heights, Doughty Street, Furman Street, and Squibb Park (see **Figure A-2**). The Project Area is adjacent to the Fulton Ferry Historic District and between the DUMBO and Brooklyn Heights neighborhoods in Community District 2 of Brooklyn.

The Project Area has an approximate total lot area of 101,720 square feet (sf). Projected Development Site 1 is improved with an existing 12-story (including basement), 131-foot, 295,980-gross-square-foot (gsf) commercial building with 125 parking spaces. Projected Development Site 2 is improved with four existing, abutting commercial buildings totaling 399,020

[1] Options 2, 3, and 4 of the MIH Program would result in 144 to 216 permanently affordable units depending on the MIH option selected.

2.3.26





Project Area

1 *Projected Development Site*

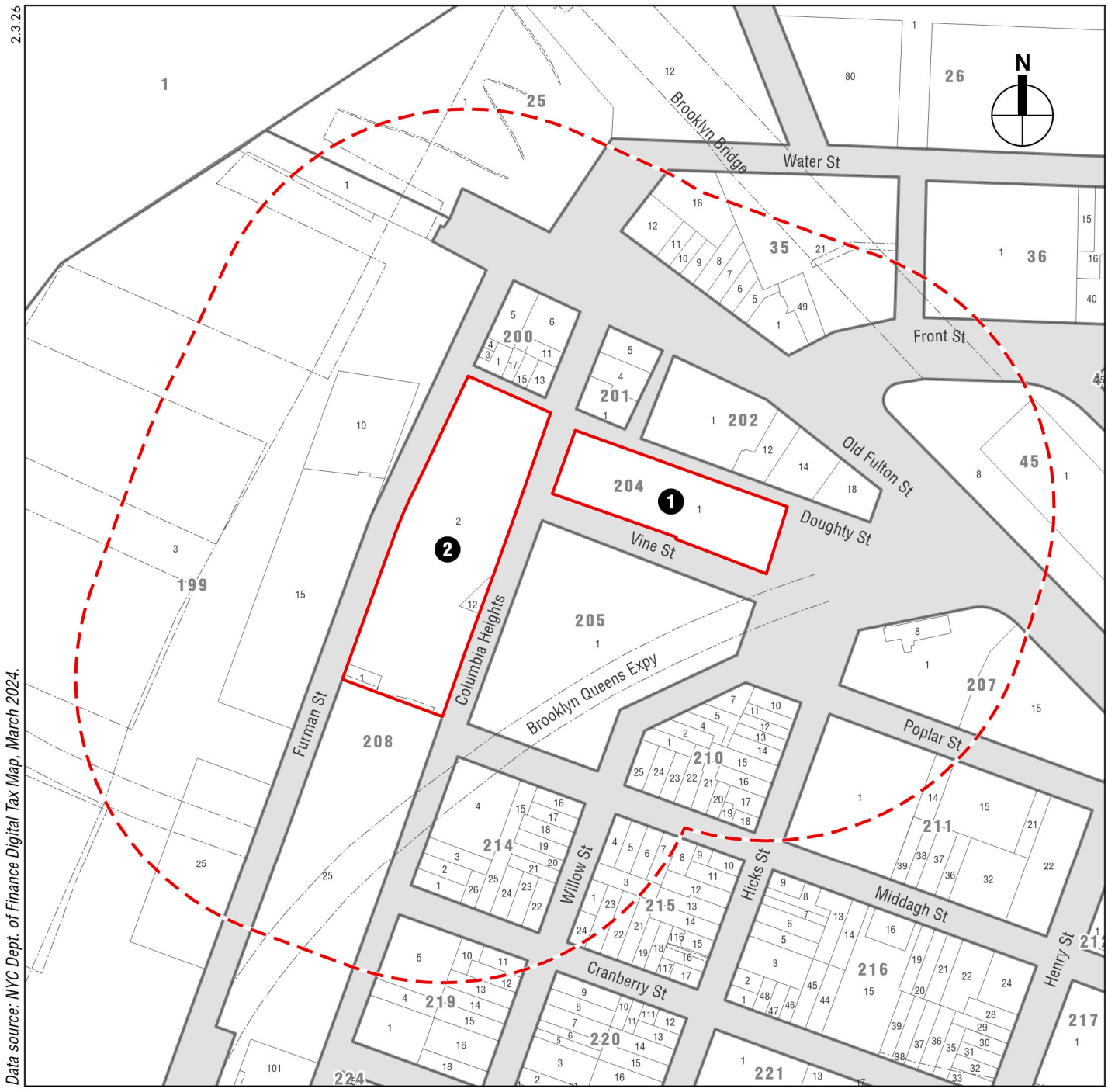
Rezoning Area

Study Area (400-foot perimeter)

Project Location

COLUMBIA HEIGHTS REZONING

Figure A-1



Project Area

Projected Development Site

Study Area (400-foot perimeter)

Tax Lot Boundary

Tax Block Boundary

Other Boundary

Tax Map

COLUMBIA HEIGHTS REZONING

Figure A-2

gsf, the largest of which is a 13-story (141-foot) building occupying the northern portion of the site.[2]

The Project Area is within an M2-1 zoning district. M2-1 districts allow manufacturing and commercial uses at a maximum FAR of 2.0, and do not allow community facility uses other than specified museums. M2-1 districts are subject to high parking requirements that vary based on the type and size of the use. Building heights are regulated by a sky exposure plane beginning at 60 feet (or four stories) above the street line (see **Figure A-3a**).

The Project Area is surrounded primarily by open spaces and transportation infrastructure with significant grade changes. Adjacent open spaces include Hillside Dog Park (1.37 acres) to the southeast, Squibb Park (0.63 acres) with a playground directly south of Projected Development Site 2, Harry Chapin Playground (0.30 acres) east of Squibb Park, and Brooklyn Bridge Park spanning 1.3 miles of waterfront to the west across Furman Street. Major transportation infrastructure includes the Brooklyn-Queens Expressway (BQE) running along the southern boundaries of Hillside Dog Park and Squibb Park before passing beneath the Brooklyn Heights Promenade, and the Brooklyn Bridge approximately 1-2 blocks northeast of the Project Area (see **Figure A-3b**).

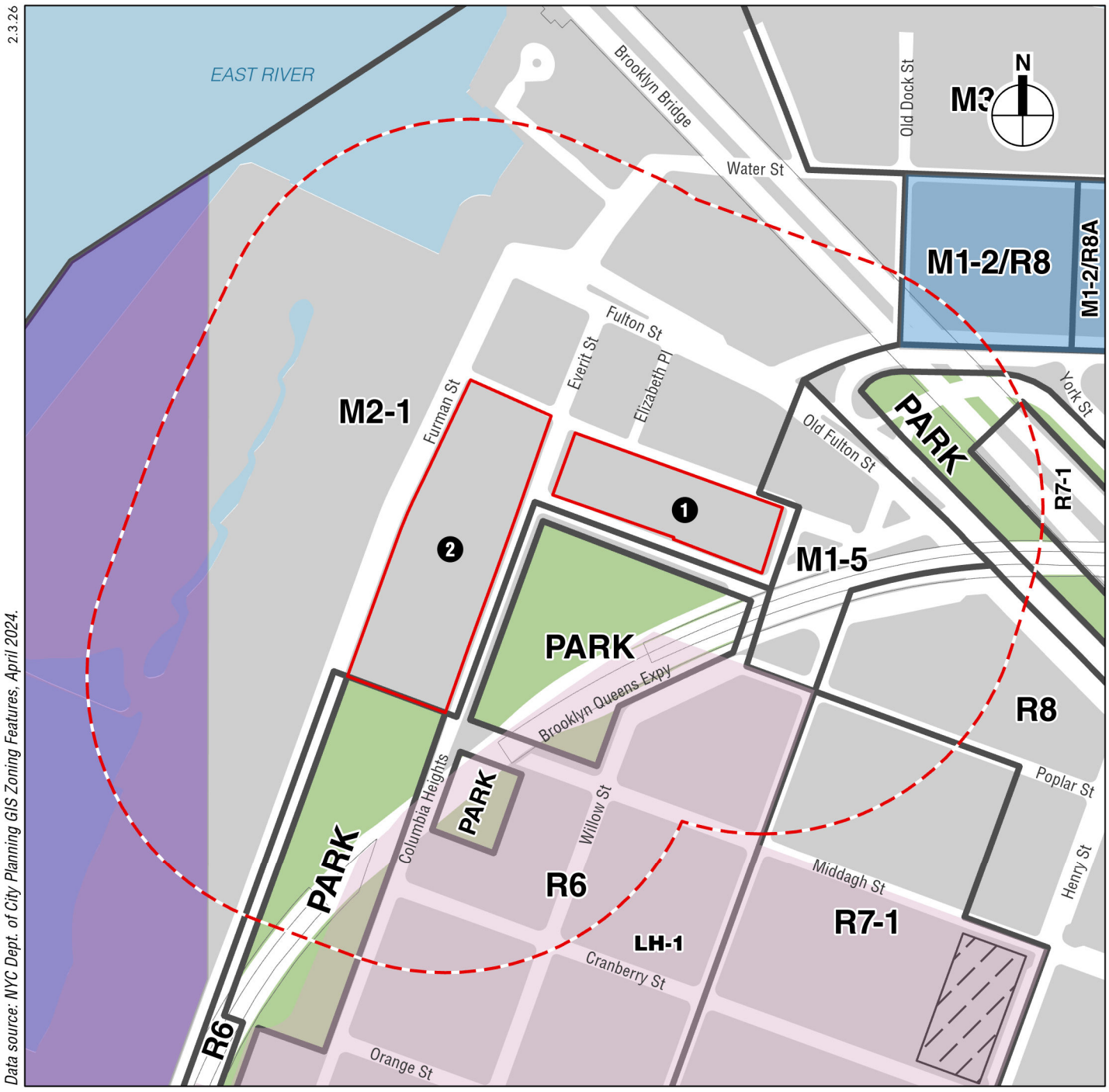
PROPOSED DEVELOPMENT

PROJECTED DEVELOPMENT SITE 1—25 COLUMBIA HEIGHTS

The Applicant intends for the 25 Columbia Heights Building to be partially converted to residential use and enlarged to a maximum height of approximately 17 stories (approximately 210 feet). The converted and enlarged building would contain approximately 460,570 gsf (12.0 FAR), of which approximately 399,710 gsf would be residential use (392 dwelling units), 14,850 gsf would be commercial and/or community facility use, and 46,010 gsf would be accessory residential parking (see **Figures A-4a and A-4b**). Based on potential layout, unit mix and configuration of the residential units, average size of the loft-style units would be approximately 1,020 gsf. The Proposed Development would include the 165 existing parking spaces, which would be designated as accessory to the proposed residential use.

It is the Applicant's intention that approximately 25 percent of the residential floor area in the building would comprise affordable units (approximately 98 dwelling units) at an average of 60 percent of Area Median Income (AMI) or lower, in accordance with the Applicant's preferred Option 1 of the Mandatory Inclusionary Housing (MIH) Program, which would apply to the Project Area pursuant to the Applicant's proposed text amendment to Appendix F. Other options under MIH include: Option 2 which would require 30 percent of the floor area (approximately 118 units) for affordable housing at an average of 80 percent of AMI or lower; Option 3 which would require 20 percent of the floor area (approximately 79 units) for affordable housing at an average of 40 percent of AMI or lower; and Option 4 which would require 30 percent of the floor area (approximately 118 units) for affordable housing at an average of 115 percent of AMI.

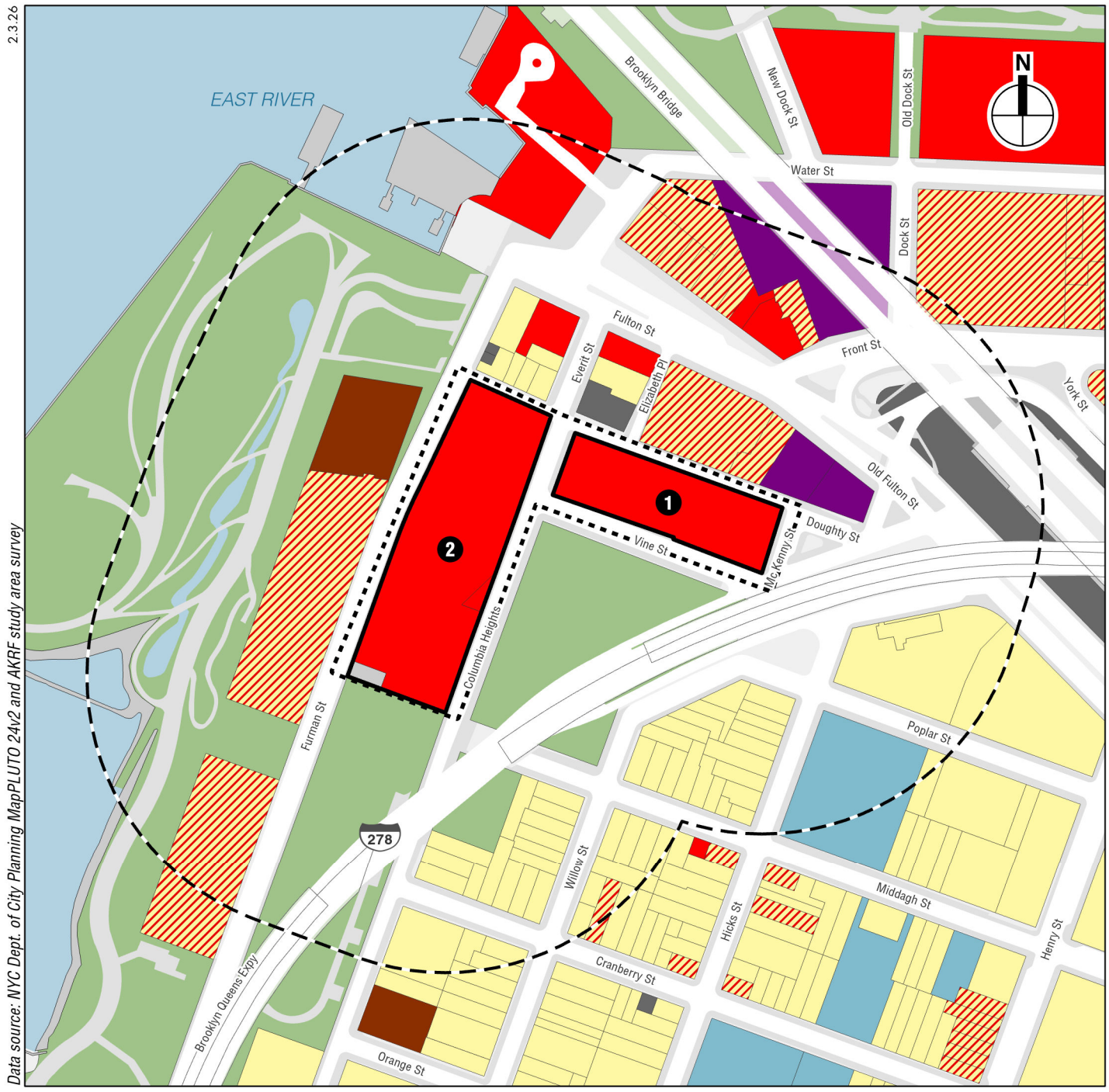
[2] To facilitate comparison between the existing and proposed conditions on the Development Site, all existing and proposed heights for the 25 Columbia Heights Building and the northern 30 Columbia Heights Building are based on the applicable base plane under the proposed district regulations.



Existing Zoning

COLUMBIA HEIGHTS REZONING

Figure A-3a



Existing Land Use

COLUMBIA HEIGHTS REZONING

Figure A-3b

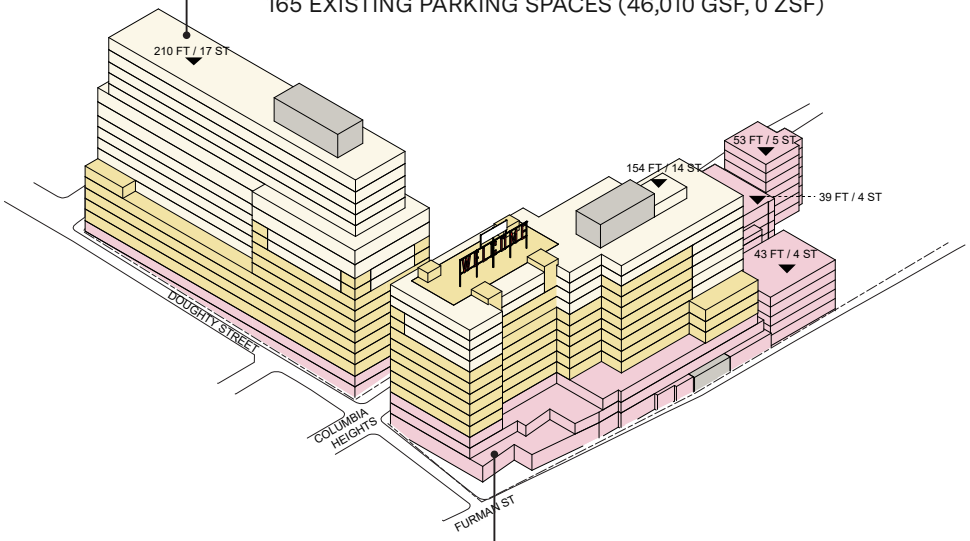
25 Columbia Heights

12.00 FAR - PROPOSED

460,570 GSF (379,510 ZSF)

14,850 GSF (12,240 ZSF) COMMERCIAL
399,710 GSF (367,270 ZSF) RESIDENTIAL

165 EXISTING PARKING SPACES (46,010 GSF, 0 ZSF)



Current Proposed
M1-5A/R10A (25 CH)
M1-5A/R8A (30 CH)

30 Columbia Heights

6.11 FAR - PROPOSED

464,710 GSF (428,060 ZSF)

171,320 GSF (167,570 ZSF) COMMERCIAL
278,390 GSF (260,490 ZSF) RESIDENTIAL

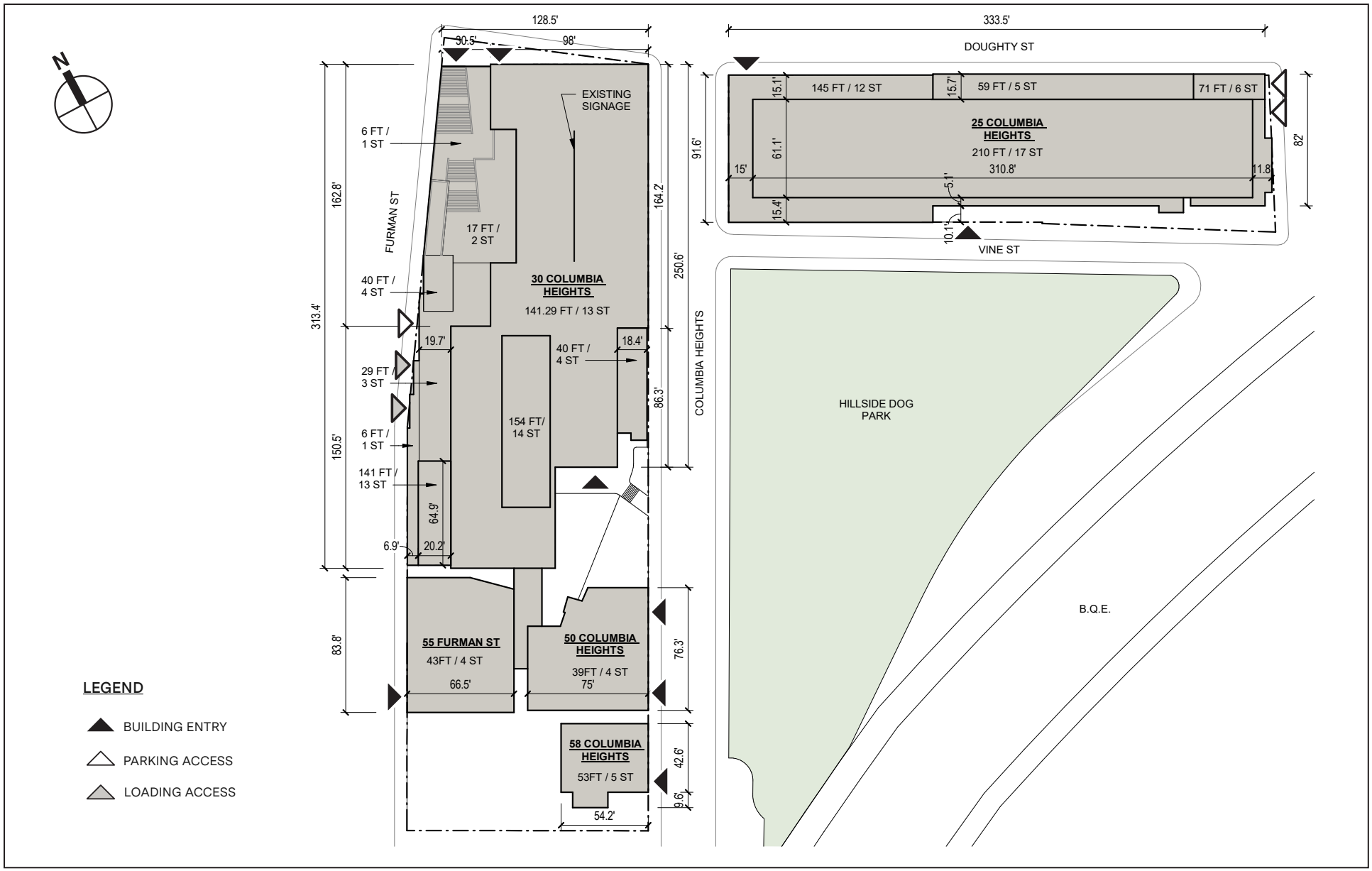
23 PARKING SPACES PROVIDED (15,000 GSF, 0 ZSF)

LEGEND

- RESIDENTIAL CONVERSION
- RESIDENTIAL ENLARGEMENT
- COMMERCIAL / COMMUNITY FACILITY
- MECH/BOH

Source: Morris Adjmi Architects

Proposed Massing
Figure A-4a



Source: Morris Adjmi Architects

Proposed Site Plan

Figure A-4b

PROJECTED DEVELOPMENT SITE 2—30 COLUMBIA HEIGHTS

The Applicant also intends that the northern 30 Columbia Heights Building be converted partially to residential use, with part of the building enlarged to a maximum height of approximately 14 stories (approximately 154 feet, which is the height of the 14th-story vestibule and support space that would be provided for common roof access) and other portions of the building enlarged to a maximum height of 13 stories (approximately 141 feet) (see **Figures A-4a and A-4b**). The three smaller buildings (commercial buildings of 4-5 stories and 39-53 feet) would not have any change in bulk or use. Following the proposed conversion and enlargement, the zoning lot would contain approximately 464,710 gsf (6.11 FAR), of which approximately 278,390 gsf would be residential use (269 dwelling units), 171,320 gsf would be commercial and/or community facility use, and 15,000 gsf would be accessory residential parking. Based on potential layout, unit mix and configuration of the residential units, average size of the loft-style units would be approximately 1,035 gsf. The Proposed Development would include 23 parking spaces, accessory to the residential use.

The Applicant intends for approximately 25 percent of the residential floor area in the building to be comprised of affordable units (approximately 67 dwelling units) at an average of 60 percent of AMI or lower, in accordance with the Applicant's preferred Option 1 of the MIH Program, which would apply to the Project Area pursuant to the Applicant's proposed text amendment to Appendix F. Other options under MIH include: Option 2 which would require 30 percent of the floor area (approximately 81 units) for affordable housing at an average of 80 percent of AMI or lower; Option 3 which would require 20 percent of the floor area (approximately 54 units) for affordable housing at an average of 40 percent of AMI or lower; and Option 4 which would require 30 percent of the floor area (approximately 81 units) for affordable housing at an average of 115 percent of AMI. The three smaller buildings (commercial buildings of 4 to 5 stories and 39 to 53 feet) would not have any change in bulk or use.

The Proposed Development would not utilize all floor area permitted under the proposed rezoning on Projected Development Site 2. Therefore, to ensure a conservative analysis of environmental effects, a Reasonable Worst Case Development Scenario (RWCDS) for the Proposed Actions was developed assuming full utilization of allowable FAR under the proposed zoning districts. The RWCDS detailed below is assessed as the With Action Condition for the purposes of environmental review.

The Proposed Actions would affect only the Applicant-controlled sites that comprise the Project Area, such that no development on other sites would be projected under the With Action scenario.

BUILD YEAR

The analysis year assumes construction of the Proposed Development would commence in early 2027. It is estimated that construction of the Proposed Development would last approximately 31 months and would be completed in 2029. Accordingly, the EIS uses a build year of 2029.

ACTIONS NECESSARY TO FACILITATE THE PROPOSED DEVELOPMENT

To facilitate the Proposed Development, a number of approvals are required, including discretionary actions that are subject to CEQR. The Proposed Development is also subject to the City's Uniform Land Use Review Procedure (ULURP). The lead agency for the environmental review is the New York City Department of City Planning (DCP). The Proposed Actions consist of the following:

- A zoning map amendment to change the existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts within a newly established Special Mixed Use (MX) District. The existing M2-1 zoning district is a manufacturing district which allows industrial and commercial use at a maximum FAR of 2.0 and does not allow residential use or most community facility uses. The proposed M1-5A/R10A and M1-5A/R8A districts would allow residential use and a range of appropriate light-industrial, commercial, and community facility uses, subject to total maximum FARs of 12.0 and 7.2, respectively. The areas affected by the zoning map amendment are controlled by the Applicant.
- A zoning text amendment to establish an MX District and to amend Appendix F of the Zoning Resolution (ZR) to establish the Project Area as an MIH area. MX Districts are mapped in conjunction with paired M/R districts (like the ones that would be established by the proposed zoning map amendment) and are intended to encourage investment in mixed-residential and industrial neighborhoods by permitting the expansion and new development of an array of complementary residential and non-residential uses while protecting the public's health, safety and general welfare. MIH areas require a portion of new residential development to be permanently income-restricted to low- and/or moderate-income New Yorkers. The specific apportionment is determined based on which MIH Option is proposed and ultimately selected; the Applicant is proposing MIH Option 1, which would require approximately 25 percent of the residential floor area be permanently affordable.

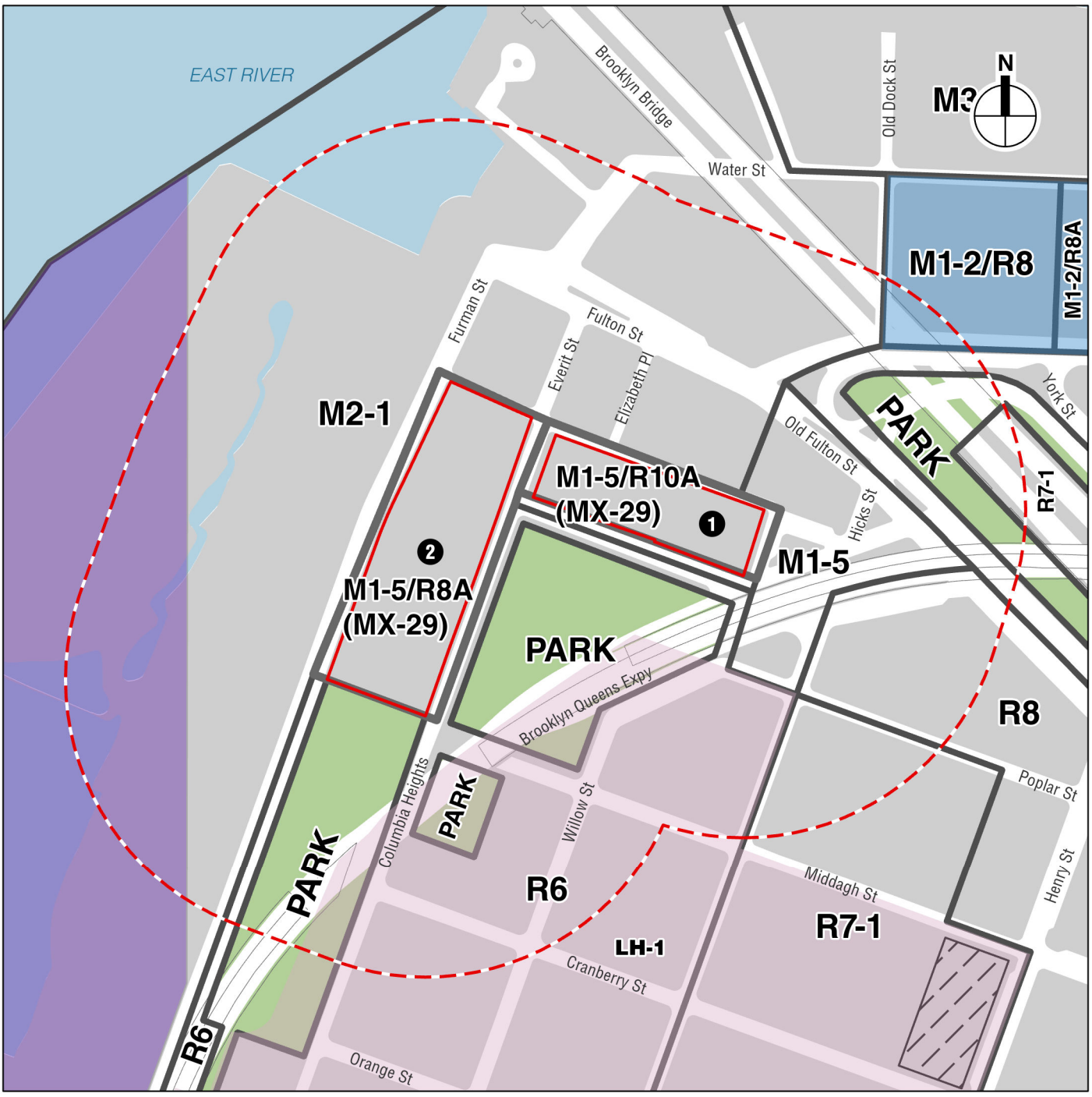
Under the Proposed Actions, Projected Development Site 1 would be rezoned from the existing M2-1 district to a paired M1-5A/R10A zoning district, and Projected Development Site 2 would be rezoned from the existing M2-1 district to a paired M1-5A/R8A zoning district. The entire Project Area would be mapped within an MX District (see **Figure A-5**).

In addition, pursuant to the proposed zoning text amendment, the Project Area would be designated as an MIH area and made subject to Option 1 of the MIH Program. Under Option 1, approximately 25 percent of the residential floor area in the Proposed Development would be affordable at a weighted average of 60 percent of area median income (AMI), as more particularly set forth in ZR Section 27-131(a)(3)(i).

PURPOSE AND NEED FOR THE PROPOSED ACTIONS

The Applicant is proposing to reactivate two vacant and underutilized former industrial buildings with a mix of new market rate and affordable housing and local retail and office space adjacent to amenity-rich neighborhoods and mass transit. The Project Area is improved with large, old, former industrial buildings that require substantial work and investment to bring them up to code and reactivate them. The Proposed Development would leverage market pressures for residential space to support these critical investments. However, it is not possible to develop the Proposed Development under current conditions given that the existing zoning precludes residential use.

The Proposed Actions would help facilitate critical investments that would support the reactivation of the Project Area. The Project Area buildings were first developed as a factory plant in the 1920s by E.R. Squibb & Sons Pharmaceutical before being adaptively reused by the Watchtower Bible and Tract Society as offices, storage, a trade school, and a transient hotel. Old industrial buildings, such as these, were built and renovated over the years under outdated or non-existent building codes. These buildings were originally designed for commercial or industrial use, meaning they often lack modern-day infrastructure such as updated plumbing, electrical systems, and insulation. Additionally, many of these structures feature outdated or non-compliant structural elements, such as inadequate fireproofing, limited accessibility, or insufficient ventilation.



Proposed Zoning

COLUMBIA HEIGHTS REZONING

Figure A-5

Compliance with current building codes for safety, energy efficiency, and accessibility can lead to substantial renovations at significant costs. The former Watchtower use vacated the Project Area in 2017, and between 2018 and 2020, the Applicant completed upgrades and repairs to elevators, façades, retail space, stairs, and mechanical systems that were designed and built to allow future tenants to customize their space and tie-in to the base building systems. Lease negotiations for office and retail space in the existing buildings were adversely affected by the COVID pandemic in 2020; in 2021, leasing activities on Projected Development Sites 1 and 2 were put on hold due to low demand and increasing availability at similar rates in more transit-friendly locations in Manhattan. The Applicant relaunched leasing efforts in early 2022, but as of 2024, the Brooklyn office market had not fully rebounded due to a large amount of low-priced, well-located space in Manhattan. Due to the expense of the 2018 to 2020 construction upgrades and carrying costs (e.g., interest and real estate taxes), the Applicant could not lease to many tenants at below market rates without adverse financial implications. A key success factor in the City's revitalization of former industrial buildings has been their conversion to residential use. However, the current zoning does not allow residential use.

The Project Area has been zoned in the existing M2-1 district since the adoption of the Zoning Resolution in 1961. M2-1 districts generally allow commercial uses in Use Groups IV and VI through IX and manufacturing uses in Use Group X at a maximum FAR of 2.0. The standard height and setback regulations establish a maximum front wall height of 60 feet or 4 stories, whichever is less, with an initial setback distance of 20 feet and sky exposure plane of 2.7 to 1 on narrow streets and an initial setback distance of 15 feet and sky exposure plane of 5.6 to 1 on wide streets. The existing M2-1 district regulations do not allow residential uses, including affordable housing, which would constitute the primary use in the Proposed Development. In addition, the applicable floor area and height and setback regulations preclude an enlargement of the existing non-complying buildings and the physical alterations that would be needed to accommodate the proposed residential density on the Projected Development Sites.

As New York City’s economy and population continue to change, the City is challenged with addressing a shortage of all types of housing, especially apartments affordable to low- and moderate-income New Yorkers. Reinforced by a low rate of residential construction city-wide, there is a critical lack of housing that is affordable for lower- and moderate-income households. In recent decades, surrounding neighborhoods, like Brooklyn Heights, Cobble Hill, the Columbia Street Waterfront District, Carroll Gardens, and Boerum Hill, were contextually rezoned to limit development in keeping with the existing prevailing built form. At the same time, these neighborhoods experienced an increase in the number and size of designated historic landmarks and districts, which has increased the neighborhoods’ desirability and value, while further curtailing redevelopment opportunities. This in turn placed mounting pressure for new residential development in the relatively small areas where residential space exists and is allowed.

The Proposed Actions would promote the development of new housing alongside appropriate non-residential uses and facilitate mixed-income communities by requiring permanently affordable housing units be included in any new residential development. The proposed M1-5A/R10A(MX) district for Projected Development Site 1 would allow maximum FARs of 12.0 for residential use and 6.5 for commercial use, with a maximum base height of 155 feet and a maximum building height of 293 feet (increased from the standard maximum building height of 235 feet, since the zoning lot has a lot area of more than 20,000 sf). The proposed M1-5A/R8A(MX) district for Projected Development Site 2 would allow maximum FARs of 7.2 for residential use and 6.5 for commercial use, with a maximum base height of 155 feet and a maximum building height of 256 feet (increased from the standard maximum building height of

205 feet, since the zoning lot has a lot area of more than 20,000 sf). The proposed MX District would allow an appropriate mix of light-industrial, commercial, and residential use, and the establishment of an MIH area conterminous with the Project Area would ensure development of permanently income-restricted units. The proposed zoning would allow sufficient density and an overall building envelope for the former industrial buildings to be partially converted and enlarged with new market rate and affordable residential space.

Overall, the Proposed Actions are needed to facilitate the Proposed Development, which would advance the City's planning policies by introducing a substantial amount of new housing, including affordable housing, and neighborhood-enhancing commercial uses to the Project Area. The Proposed Development would bring new residents and workers to the Project Area, which would create a more active, safe, and inviting streetscape while also increasing the City's tax base.

ANALYSIS FRAMEWORK

The analysis framework lays out the conditions upon which the potential impacts of the Proposed Actions will be measured.

REASONABLE WORST CASE DEVELOPMENT SCENARIO (RWCDS)

A RWCDS is used to identify the maximum development allowed under the Proposed Actions and to allow a comparison of that development to the future without the Proposed Actions (the "No Action" condition) in order to project potential significant adverse impacts. The Applicant's Proposed Development in the future with the Proposed Actions (the "With Action" condition) would not utilize all floor area permitted under the proposed rezoning on Projected Development Site 2. Therefore, to present a conservative analysis, a RWCDS was developed assuming full utilization of allowable FAR under the proposed zoning districts. The building bulk assumed for the RWCDS reflects the achievement of full FAR utilization with efficient and practicable floorplates that could reasonably be built.

NO ACTION CONDITION

Absent the Proposed Actions, the Project Area would be retenanted with complying commercial uses in the existing buildings. These uses are permitted under existing zoning and no discretionary actions would be required. Absent the opportunity for residential use that would be allowed by the Proposed Actions, the Applicant would lease space in the buildings for conforming commercial uses, consistent with market conditions. It is estimated that approximately 2,596 workers would support these retail and office uses. In comparison to the No-Action condition established for the RWCDS, the With-Action condition would result in fewer employees. This reduction reflects conservative CEQR analysis assumptions, under which the No Action condition assumes that the currently vacant commercial space would be occupied. Under the With Action condition, this commercial space would be reduced in order to construct the residential uses included in the Proposed Project and the No Action workers would not materialize. The No Action tenants would not represent direct displacement as they do not currently exist and a variety of commercial offerings throughout DUMBO and other neighborhoods adjacent to the Project Area could readily accommodate these uses.

WITH ACTION CONDITION

The Applicant's Proposed Development, as noted above, includes the partial conversion and enlargement of the former industrial buildings on Projected Development Sites 1 and 2. However,

the Proposed Development would not utilize all floor area permitted under the proposed rezoning on Projected Development Site 2. Therefore, to present a conservative analysis, a RWCDS was developed assuming full utilization of allowable FAR under the proposed zoning districts (see **Table A-1** for details). The RWCDS is assessed for the purposes of environmental review.

The RCWDS on Projected Development Site 1 is the same as the Applicant's Proposed Development described above: it consists of the existing 295,980 gsf, 12-story commercial building being enlarged by approximately 162,590 gsf (6 stories) to a 17-story (210 feet), approximately 460,570-gsf building. The building would be renovated to include approximately 399,710 gsf residential use (392 dwelling units, including 79 to 118 affordable units depending on the MIH option selected), approximately 14,850 square feet of commercial use and 46,010 gsf of parking (165 spaces), accessory to the residential use. Approximately 25 percent of the residential floor area in the building would comprise 98 affordable units, in accordance with the Applicant's preferred Option 1 of the MIH Program,[3] which would apply to the Project Area pursuant to the Applicant's proposed text amendment to Appendix F. The building would be built to the maximum 12.0 FAR allowed under the proposed zoning and to a height of 210 feet.

The RWCDS for Projected Development Site 2 consists of the existing 13-story commercial building being renovated and enlarged by approximately 145,890 gsf and from 13 stories (141 feet) to 19 stories (205 feet). The zoning lot would include approximately 544,910 gsf, with approximately 358,590 gsf of residential use (324 dwelling units, including 65 to 98 affordable units depending on the MIH option selected), approximately 171,320 sf of commercial use, and 15,000 gsf of parking (23 spaces) accessory to the residential use. The three smaller buildings would not have any change in bulk or use (commercial buildings of 4 to 5 stories and 39to 53 feet). Approximately 25 percent of the residential floor area in the building would comprise 81 affordable units, in accordance with the Applicant's preferred Option 1 of the MIH Program[4], which would apply to the Project Area pursuant to the Applicant's proposed text amendment to Appendix F. The zoning lot would be built to the maximum FAR of 7.2 allowed under the proposed zoning and to a building height of 205 feet. See **Figures A-6a and A-6b** for the RWCDS site plan and massing.

Overall, the RWCDS for the EAS includes approximately 1,005,480 gsf of total development, consisting of approximately 758,300 gsf of new residential space (approximately 716 total dwelling units, of which approximately 144 to 216 would be permanently affordable units depending on the MIH option selected), approximately 186,170 gsf of local retail and office space, and 188 parking spaces. Three smaller commercial buildings (4 to 5 stories) on Projected Development Site 2 would remain unchanged in both bulk and use. Based on potential layout and

[3] Other options under MIH include: Option 2 which would require 30 percent of the floor area (approximately 118 units) for affordable housing at an average of 80 percent of AMI or lower; Option 3 which would require 20 percent of the floor area (approximately 79 units) for affordable housing at an average of 40 percent of AMI or lower; and Option 4 which would require 30 percent of the floor area (approximately 118 units) for affordable housing at an average of 115 percent of AMI.

[4] Other options under MIH include: Option 2 which would require 30 percent of the floor area (approximately 81 98 units) for affordable housing at an average of 80 percent of AMI or lower; Option 3 which would require 20 percent of the floor area (approximately 54 65 units) for affordable housing at an average of 40 percent of AMI or lower; and Option 4 which would require 30 percent of the floor area (approximately 81 98 units) for affordable housing at an average of 115 percent of AMI.

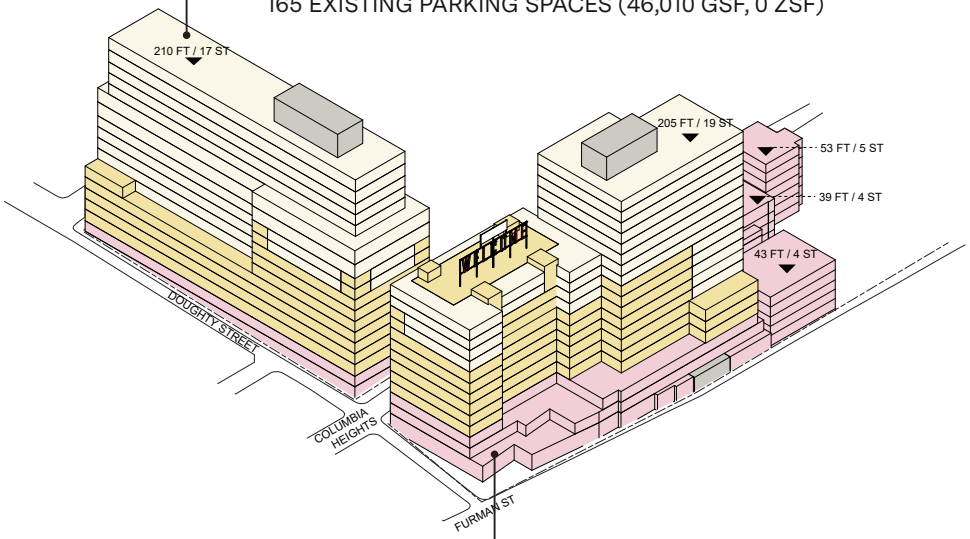
25 Columbia Heights

12.00 FAR - PROPOSED

460,570 GSF (379,510 ZSF)

14,850 GSF (12,240 ZSF) COMMERCIAL
399,710 GSF (367,270 ZSF) RESIDENTIAL

165 EXISTING PARKING SPACES (46,010 GSF, 0 ZSF)



Current Proposed
M1-5A/R10A (25 CH)
M1-5A/R8A (30 CH)

30 Columbia Heights

7.2 FAR - RWCDS

544,910 GSF (504,450 ZSF)

171,320 GSF (167,570 ZSF) COMMERCIAL
358,590 GSF (336,890 ZSF) RESIDENTIAL

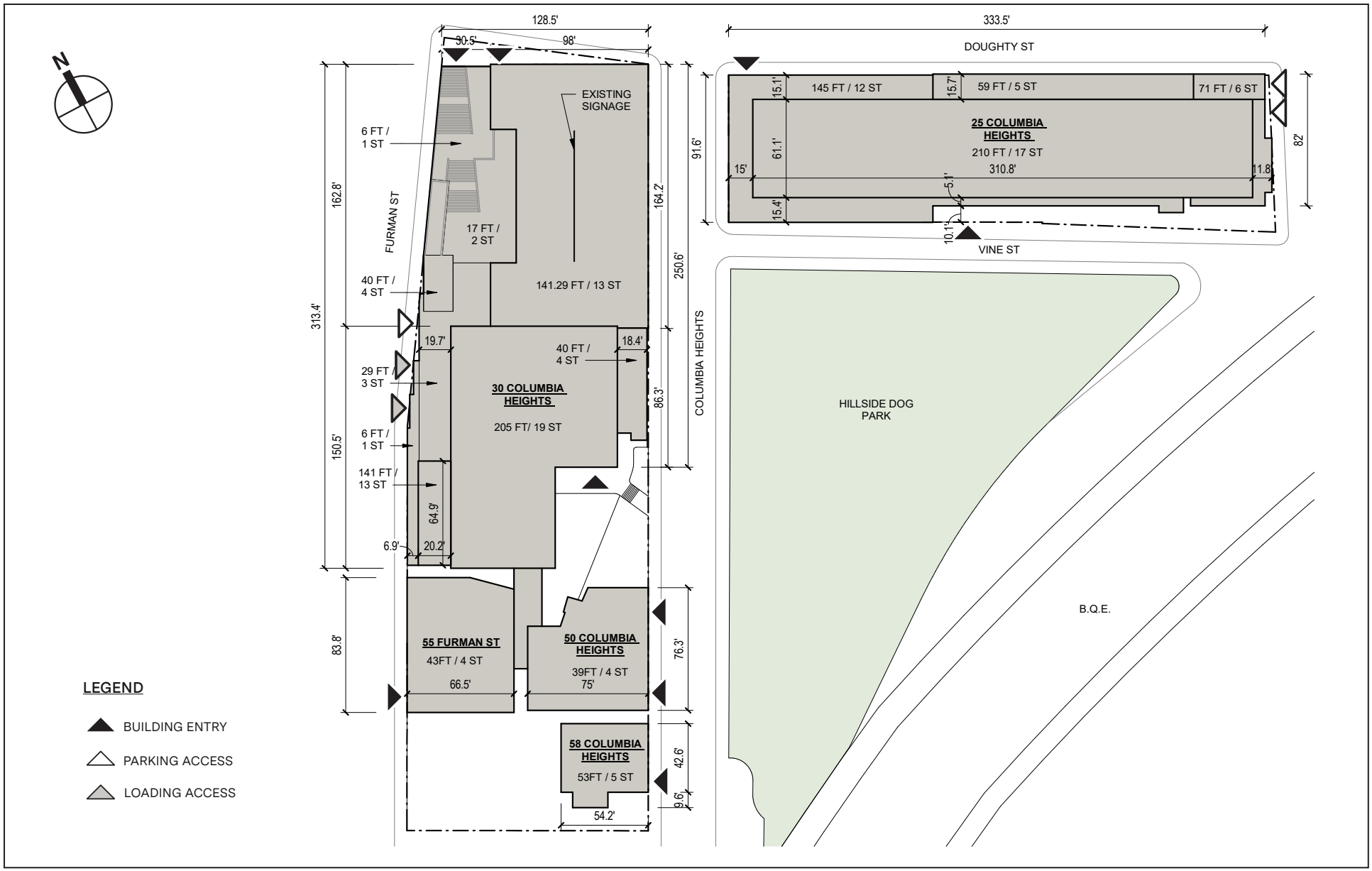
23 PARKING SPACES PROVIDED (15,000 GSF. 0 ZSF)

LEGEND

- RESIDENTIAL CONVERSION
- RESIDENTIAL ENLARGEMENT
- COMMERCIAL / COMMUNITY FACILITY
- MECH/BOH

Source: Morris Adjmi Architects

RWCDS Massing



Source: Morris Adjmi Architects

RWCDS Site Plan

Figure A-6b

unit mix, the average unit size would be approximately 1,020 gsf and 1,100 gsf for Projected Development Sites 1 and 2, respectively.

Table A-1
Reasonable Worst Case Development Scenario

	No Action Condition			With Action Condition			
Use	Projected Development Site 1 (25 Columbia Heights)	Projected Development Site 2 (30 Columbia Heights)	Total	Projected Development Site 1 (25 Columbia Heights)	Projected Development Site 2 (30 Columbia Heights)	Total	Increment
Residential gsf	-	-	0	399,710	358,590	758,300	758,300
Residential DUs	-	-	0	392	324	716*	716
Affordable DUs**	-	-	0	98 (Option 1) 79 to 118	81 (Option 1) 65 to 98	179 (Option 1) 144 to 216	179 (Option 1) 144 to 216
Commercial gsf	295,980	399,020	695,000	14,850	171,320	186,170	-508,830
Parking gsf	46,010	-	46,010	46,010	15,000	61,010	15,000
Parking Spaces	125	-	125	165	23	188	63
Total gsf	341,990	399,020	741,010	460,570	544,910	1,005,480	264,470
Population							
Residents			0			1,446	1,446
Workers			2,596			745	-1,752

Notes:
* Based on potential layout, unit mix, and configuration of the residential units, the average size of the loft-style units would be approximately 1,020 gsf on Projected Development Site 1 and 1,100 gsf on Projected Development Site 2.
** The Applicant's preferred Option 1 of the MIH program would result in 179 affordable units; other options would result in 144 to 216 affordable units, depending on the option selected.
gsf – Gross Square Feet
DU – Dwelling Units

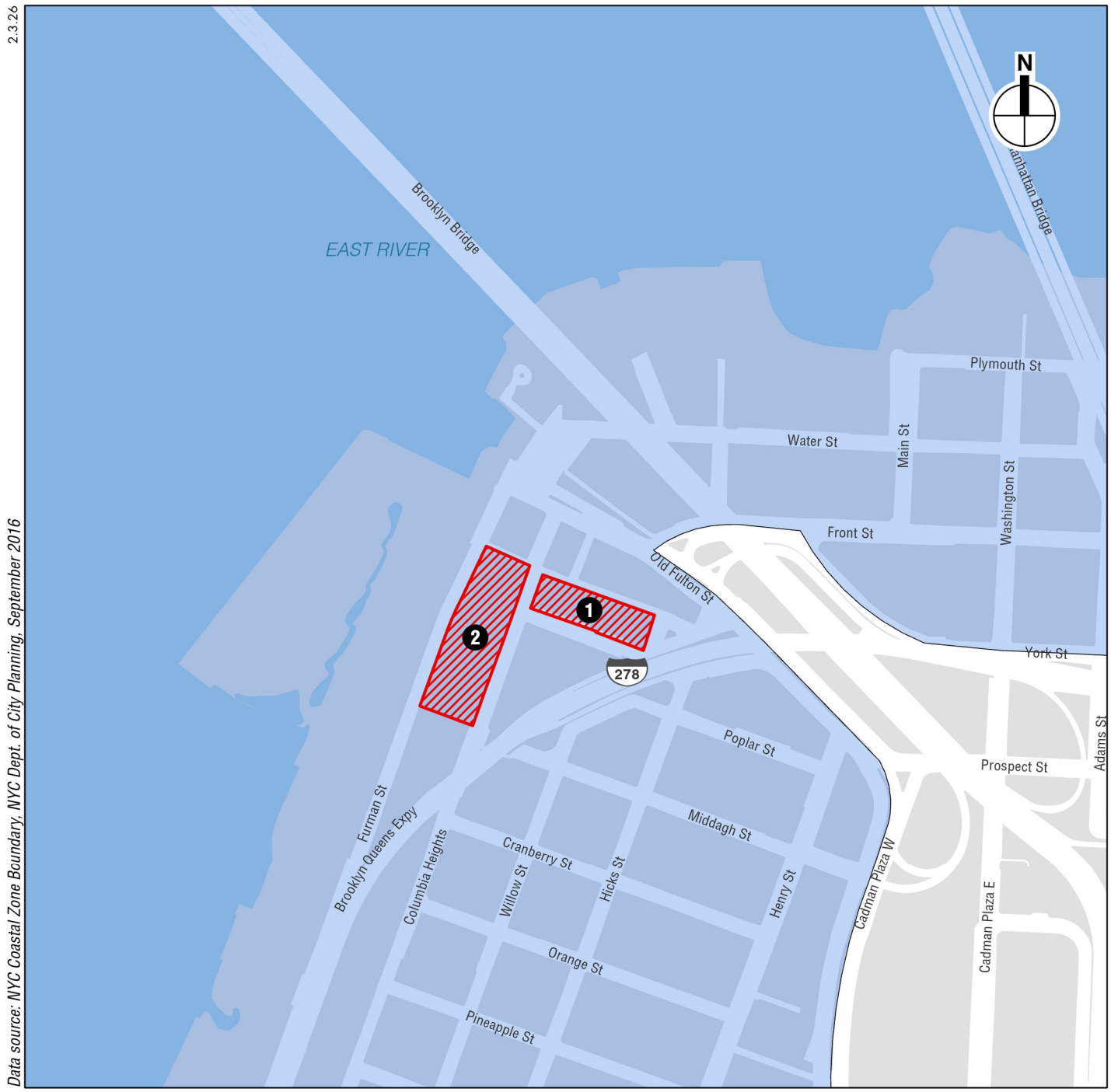
B. ADDITIONAL TECHNICAL INFORMATION FOR EAS PART II

LAND USE, ZONING, AND PUBLIC POLICY

According to the *CEQR Technical Manual*, a land use analysis characterizes the uses and development trends in the area that may be affected by a project, describes the public policies that guide development, and determines whether a project is compatible with those conditions and policies or whether it may affect them. The Proposed Actions include a zoning map amendment and a zoning text amendment as described on page 1 of the EAS Form, and the Project Area is located within the New York City Coastal Zone (see **Figure A-7**) and a portion of the Project Area is located in the flood zone (see **Figure A-8**). Therefore, the potential effects of the Proposed Actions on land use trends, zoning, and applicable public policies in the study area are assessed in EAS Attachment B, "Land Use, Zoning, and Public Policy," and additional analyses will be provided in the EIS, as described in the Draft Scope of Work.

SOCIOECONOMIC CONDITIONS

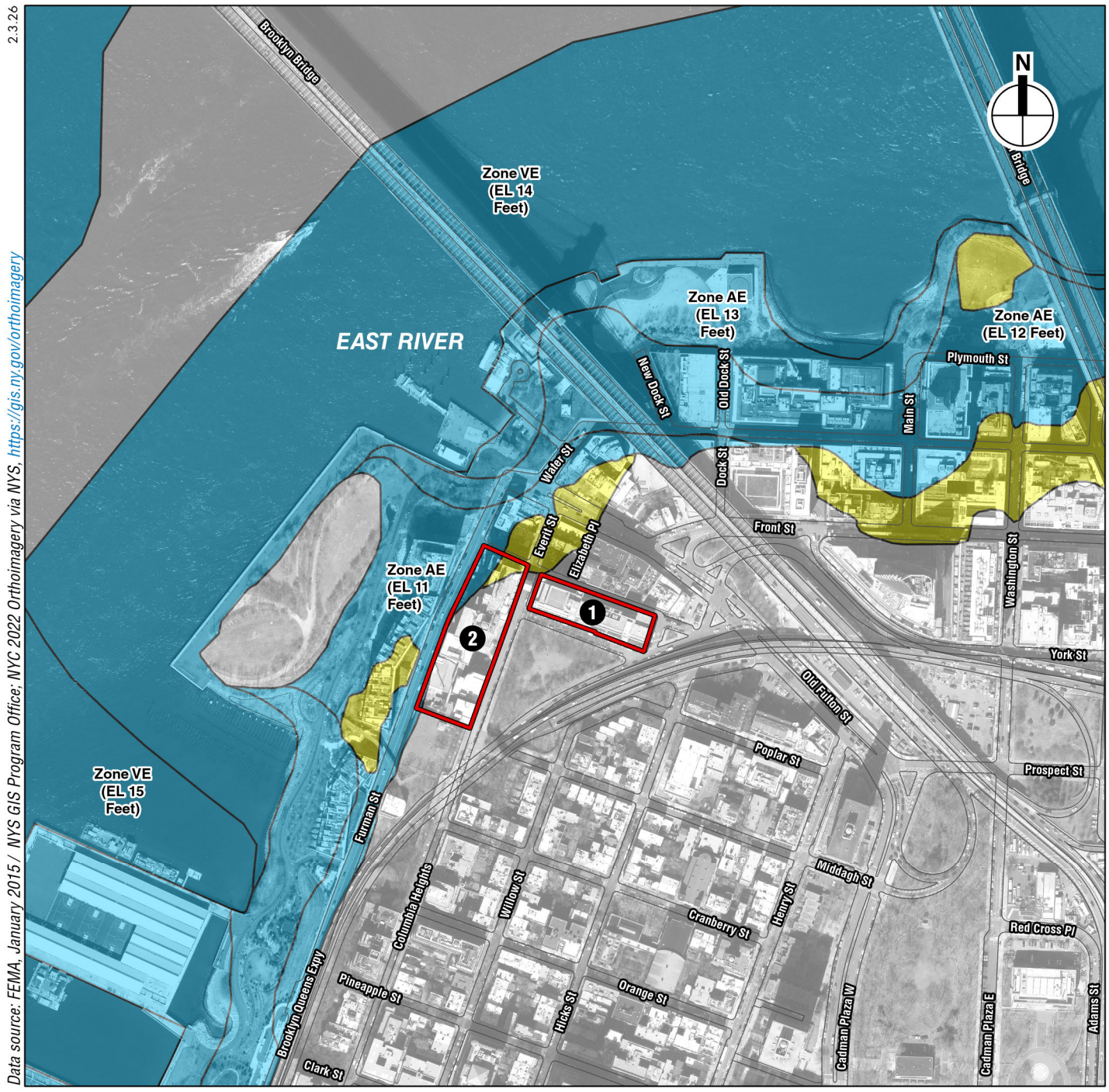
The socioeconomic character of an area includes its population, housing, and economic activity. According to the *CEQR Technical Manual*, the five principal issues of concern with respect to socioeconomic conditions are whether a proposed project would result in significant impacts due



NYC Coastal Zone Boundary

COLUMBIA HEIGHTS REZONING

Figure A-7



FEMA Preliminary FIRM 2015

COLUMBIA HEIGHTS REZONING

Figure A-8

to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on a specific industry. An assessment of the Proposed Actions' potential effects to socioeconomic conditions is presented in EAS Attachment C, "Socioeconomic Conditions."

COMMUNITY FACILITIES AND SERVICES

The Proposed Actions are expected to exceed CEQR thresholds requiring analyses of early childhood programs, but are not expected to exceed CEQR thresholds requiring analyses of elementary, middle, or high schools or libraries. The *CEQR Technical Manual* requires a detailed analysis of impacts on police and fire services, hospitals, and public health clinics if a proposed action would affect the physical operation of, or access to and from, a station house or healthcare facility, or where a proposed project would create a sizeable new neighborhood where none existed before. The Proposed Actions would not directly displace a station house or healthcare facility, and, therefore, would not adversely affect the physical operation of, or access to and from, a facility. In addition, the Proposed Actions would not create a sizeable new neighborhood. Therefore, detailed analyses of potential impacts on elementary, middle, and high schools, libraries, police and fire services, hospitals, and public health clinics are not warranted; EAS Attachment D, "Community Facilities and Services" describes the location of existing fire stations, police stations, hospitals, and public health clinics serving the Project Area for informational purposes.

PUBLIC SCHOOLS

A schools analysis is required under CEQR for Proposed Actions that would result in more than 100 elementary/middle school or 150 high school students. Based on preliminary projections, the RWCDS would be expected to introduce approximately 36 elementary school students, approximately 8 middle school students, and approximately 15 high school students. The number of students would not exceed CEQR thresholds requiring analysis, and no significant adverse impacts to elementary/middle or high schools would occur with the Proposed Actions.

EARLY CHILDHOOD CENTERS

The number of dwelling units affordable to families earning less than 80 percent AMI (and thus considered potentially eligible for publicly funded daycare) in the RWCDS would exceed the minimum number of dwelling units (110 affordable dwelling units) requiring detailed analyses of publicly funded child care. Therefore, the EAS Attachment D, Community Facilities and Services" includes an analysis of child care.

LIBRARIES

The Proposed Actions would not exceed the CEQR threshold requiring analysis of public libraries (834 dwelling units). Therefore, no additional analysis is required, and the Proposed Actions would not result in any significant adverse impacts to libraries.

OPEN SPACE

The *CEQR Technical Manual* recommends performing an open space assessment if a project would have a direct effect on an area open space or an indirect effect through increased population. The threshold for an assessment is whether a project would introduce more than 250 units (in an existing R5 or above, C, or M district) or 500 workers. The Proposed Actions would

result in a net increment of approximately 716 units in an M district and approximately -1,851 workers; therefore, a residential open space analysis is provided in EAS Attachment E, "Open Space."

SHADOWS

The *CEQR Technical Manual* requires a shadows assessment for proposed actions that would result in new structures that would be more than 50 feet taller than what would exist without the proposed actions, and either greater than 250 feet in maximum height, or between 50 and 250 feet and adjacent to, within, or across the street from a sunlight-sensitive resource. Such resources include publicly accessible open spaces, important sunlight-sensitive natural features, or historic resources with sun-sensitive features.

The Proposed Actions would result in structures more than 50 feet taller than what would exist or be developed on the site in the No Action condition and the Development Site is located is located adjacent to or across the street from multiple publicly accessible open spaces. Therefore, a shadows assessment is provided in EAS Attachment F, "Shadows," to determine when and how much project-generated shadow could potentially reach any sunlight-sensitive resources as a result of the Proposed Actions.

HISTORIC AND CULTURAL RESOURCES

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if there is the potential to affect either archaeological or architectural resources. Because the Proposed Actions would result in new development adjacent to the Fulton Ferry Historic District and close to the Brooklyn Heights Historic District, the analyses will consider the potential of the Proposed Actions to affect historic and cultural resources. For architectural resources, known architectural resources such as New York City Landmarks (NYCLs), Interior Landmarks, Scenic Landmarks, and New York City Historic Districts; resources calendared for consideration as one of the above by the New York City Landmarks Preservation Commission (LPC); resources listed on or formally determined eligible for inclusion on the State and National Registers of Historic Places (S/NR), or contained within a district listed on or formally determined eligible for listing on the S/NR; resources recommended by the New York State Board for listing on the S/NR; and National Historic Landmarks and potential architectural resources (those properties that appear to meet S/NR and NYCL criteria) will be identified within 400 feet of the Project Area. Potential project impacts have been assessed for all identified resources, as presented in Attachment G, "Historic and Cultural Resources."

URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the *CEQR Technical Manual*, if a project requires actions that would result in physical changes to a project site beyond those allowed by existing zoning and which could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared. The proposed rezoning would change the urban design and visual character of the Project Area; therefore, an assessment of urban design and visual resources has been prepared to determine whether the Proposed Actions, in comparison to the No Action condition, would create a change to the pedestrian experience that is sufficiently significant to require greater explanation and further study. See Attachment H, "Urban Design and Visual Resources."

NATURAL RESOURCES

A natural resources assessment is conducted when a natural resource is present on or near the project site and when a proposed action involves the disturbance of that resource. The *CEQR Technical Manual* defines natural resources as (1) water resources, including surface water bodies and groundwater; wetland resources, including freshwater and tidal wetlands; upland resources, including beaches, dunes, and bluffs; thickets, grasslands, meadows, and old fields; woodlands and forests; and gardens and other ornamental landscaping; and (2) built resources, including piers and other waterfront structures. The Project Area is occupied by existing buildings and is located in a fully developed area in Brooklyn. There are no significant natural resources on the site, the Proposed Actions would not result in any significant adverse impacts on natural resources, and therefore, no further analysis of natural resources is warranted.

HAZARDOUS MATERIALS

According to the *CEQR Technical Manual*, a hazardous materials assessment is conducted when elevated levels of hazardous materials exist on a site; when an action would increase pathways to their exposures, either human or environmental; or when an action would introduce new activities or processes using hazardous materials, thereby increasing the risk of human or environmental exposure. As described in the Draft Scope of Work, a Phase I Environmental Site Assessment (ESA) was prepared to evaluate the potential for hazardous materials in the Project Area. In a letter to DCP dated October 28, 2025, New York City Department of Environmental Protection (DEP) requested that a Subsurface (Phase II) Investigation be performed based on the Phase I ESA findings and in accordance with a DEP-approved sampling protocol, as detailed in EAS Attachment I, “Hazardous Materials.” The DEP letter is provided in EAS Appendix 1, “Agency Correspondence.” The sampling protocol will detail the proposed scope of work for any soil, groundwater, and/or soil gas evaluation on the Projected Development Sites. Once approved, a Phase II investigation may be conducted to investigate the potential presence of hazardous materials on the Development Site. Results of the Phase II investigation will be provided in a separate Phase II Report and summarized within the Hazardous Materials chapter of the EIS. Following submission of the Phase II Report to DEP, an E-Designation for hazardous materials would be placed on the tax lots to ensure that the applicant completes the remediation in accordance with the requirements of the New York City Mayor’s Office of Environmental Remediation (OER). If applicable, the EIS chapter will provide recommendations for next steps, including remediation or institutional measures that would be necessary to avoid impacts.

WATER AND SEWER INFRASTRUCTURE

According to the *CEQR Technical Manual*, an analysis of an action’s impact on the water supply system should be conducted only for actions that would have exceptionally large demand for water, such as power plants, very large cooling systems, or large developments. In addition, an analysis should be conducted if the project is located in an area that experiences low water pressure (e.g., areas at the end of the water supply distribution system such as the Rockaway Peninsula and Coney Island). As compared to the No Action condition, the Proposed Development is not expected to result in a water demand of more than one million gallons per day (gpd); therefore, a water supply analysis is not required, and no significant adverse impacts to water supply would result from the Proposed Actions.

According to the guidelines of the *CEQR Technical Manual*, a preliminary analysis of wastewater and stormwater conveyance and treatment is warranted if a project is located in a combined sewer

area and would have an incremental increase above the No Action condition of 400 dwelling units or 150,000 sf of commercial, public facility, and institution and/or community facility space in Brooklyn. Since the Proposed Actions would result in development exceeding these thresholds, an analysis of wastewater and stormwater conveyance and treatment is attached in EAS Attachment J, "Water and Sewer Infrastructure."

SOLID WASTE AND SANITATION SERVICES

The *CEQR Technical Manual* specifies that few projects generate substantial amounts of solid waste (50 tons a week or more) that would result in a significant adverse impact. *CEQR Technical Manual* Table 14-1, "Solid Waste Generation Rates," provides solid waste generation rates for various uses. Based on the rates presented in Table 14-1, it is estimated that compared with the No Action condition, the Proposed Actions would result in the generation of approximately 73,517 pounds (36.7 tons) of solid waste per week, as shown in **Table A-2**. The Proposed Actions are not expected to result in the production of more than 100,000 pounds (50 tons) of additional solid waste requiring further analysis, and therefore, the Proposed Actions would not result in any significant adverse impacts to solid waste and sanitation services.

Table A-2
With Action Solid Waste Generation

Use	Program	Solid Waste Generation Rate (lbs/wk)	Solid Waste Generation (lbs/week)	Solid Waste Generation (tons/wk)
Residential	716 du	41 per du	29,356	14.7
Retail	186,170 gsf (559 employees[1])	79 per employee	44,161	22.0
		Total Solid Waste Generation	**73,517**	**36.7**

Note:
[1] Based on 1 employee per 333 gsf
Source: *CEQR Technical Manual* Table 14-1

ENERGY

According to the *CEQR Technical Manual*, a detailed assessment of energy impacts would be limited to actions that could significantly affect the transmission or generation of energy or that generate substantial consumption of energy. The *CEQR Technical Manual* Table 15-1 provides guidance on calculating projected energy needs for various building types by square foot. Based on this guidance, the Proposed Development would result in the demand for 136,345,181 million British Thermal Units (Mbtus) per year, as shown in **Table A-3**. This would be 13,983,319 Mbtus fewer than the energy usage in the No Action condition. The Proposed Development would be served by available energy suppliers, and the Proposed Actions are not expected to generate a significant demand for energy as defined under CEQR. Therefore, no further analysis is required, and the Proposed Actions would not result in significant adverse impacts to the consumption or supply of energy.

Table A-3
With Action Annual Energy Consumption

Use	Program	Average Annual Energy Rate (Thousand btu (Mbtu)/sf/year)	Energy Consumption (btu/Year)
Residential	758,300 gsf	126.7	96,076,610
Retail	186,170 gsf	216.3	40,268,571
		Total Energy Consumption	**136,345,181**

Source: *CEQR Technical Manual*, Table 15-1, "Average Annual Whole-Building Energy Use in New York City."

TRANSPORTATION

Based on the *CEQR Technical Manual*, further transportation analyses may be warranted if a proposed action is anticipated to result in an incremental increase of 50 or more peak hour vehicle trips, 200 or more peak hour subway/rail trips, 50 or more bus trips on a single line in one direction, or 200 or more peak hour pedestrian trips. An analysis of Proposed Actions' potential impacts to transportation will be provided in the EIS, as described in the Draft Scope of Work.

AIR QUALITY

Air quality impacts can be either direct or indirect. Direct impacts result from emissions generated by stationary sources at a development site, such as emissions from on-site fuel combustion for heating and hot water systems. Indirect impacts are caused by off-site emissions associated with a project such as emissions from nearby existing stationary sources or by emissions from on-road vehicle trips generated by a proposed project or other changes to future traffic conditions due to a project. The analyses of the Proposed Actions' potential to result in significant adverse air quality impacts will be provided in the EIS, as described in the Draft Scope of Work.

GREENHOUSE GAS (GHG) EMISSIONS AND CLIMATE CHANGE

According to the *CEQR Technical Manual*, GHG assessments are appropriate for projects in New York City being reviewed in an EIS that would result in the development of 350,000 sf or more. Because the Proposed Development would exceed 350,000 gsf, an analysis of GHG emissions generated by the Proposed Actions will be undertaken, as described in the EIS Draft Scope of Work.

NOISE

The noise analysis will examine impacts of existing noise sources (e.g., vehicular traffic from adjacent roadways) on the proposed noise-sensitive uses and the impacts of project-generated traffic and stationary sources on noise-sensitive land uses nearby. The CEQR noise methodology addresses whether proposed projects would result in a significant increase in noise levels (particularly at sensitive land uses) and what level of building attenuation is necessary to provide acceptable interior noise levels. The focus of the noise analysis will be to identify the levels of building attenuation necessary to meet CEQR interior noise level requirements. A description of the noise analysis that will be undertaken in the EIS is included in the Draft Scope of Work.

PUBLIC HEALTH

According to the guidelines of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas,

such as air quality, water quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified in any one of these technical areas and the lead agency determines that a public health assessment is warranted, an analysis will be provided in the EIS, as described in the Draft Scope of Work.

NEIGHBORHOOD CHARACTER

Neighborhood character is determined by a number of factors, including land use, socioeconomic conditions, open space, historic and cultural resources, urban design, visual resources, shadows, transportation, and noise. According to the guidelines of the *CEQR Technical Manual*, an assessment of neighborhood character is generally needed when a project has the potential to result in significant adverse impacts in one of the technical areas presented above, or when a project may have moderate effects on several of the elements that define a neighborhood's character. Therefore, if warranted based on an evaluation of the Proposed Actions' impacts, an assessment of neighborhood character will be included in the EIS, following the methodologies outlined in the *CEQR Technical Manual*, as described in the Draft Scope of Work.

CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction activity could affect transportation conditions, community noise patterns, air quality conditions, and mitigation of hazardous materials. Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. In accordance with the *CEQR Technical Manual*, because the anticipated 31-month construction duration of the Proposed Development is greater than two years and the construction activities would occur in proximity to sensitive receptors (i.e., residences), the Proposed Development could have construction effects. Therefore, a construction analysis will be included in the EIS, as described in the Draft Scope of Work. ✷

Attachment B: Land Use, Zoning, and Public Policy

A. INTRODUCTION

This attachment assesses the potential impacts of the Proposed Actions on land use, zoning, and public policy. According to the 2025 *City Environmental Quality Review (CEQR) Technical Manual*, a land use analysis evaluates the uses and development trends in the area that may be affected by a proposed action and determines whether a proposed action is compatible with those conditions or may affect them. The analysis also considers a proposed action's compliance with, and effect on, the area's zoning and other applicable public policies.

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project") at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2") (together, the "Project Area"). As described in Attachment A, "Project Description and Additional Information," a Reasonable Worst-Case Development Scenario (RWCDS) was developed assuming full utilization of allowable floor area ratio (FAR) under the proposed zoning districts, even though the Proposed Development would not utilize all floor area permitted under the proposed rezoning on Projected Development Site 2. The building bulk assumed for the RWCDS reflects the achievement of full FAR utilization with efficient and practicable floorplates that conform with industry standards for residential use. The RWCDS for the EAS includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

PRINCIPAL CONCLUSIONS

As detailed below, the assessment concludes that the Proposed Actions would not result in significant adverse impacts to land use and zoning because the Proposed Actions would be compatible with existing land use and zoning in the surrounding area. An assessment of the Proposed Actions' with New York City's WRP will be prepared and discussed in the EIS.

B. METHODOLOGY

In accordance with the *CEQR Technical Manual*, if the Proposed Actions would introduce different zoning or land uses, are generic or areawide, or if they would directly or indirectly generate land use change across a neighborhood or larger area, then a detailed assessment is warranted. In accordance with *CEQR* guidance, this detailed analysis of land use, zoning, and public policy assesses the area within 400 feet of the Project Area, which is where the Proposed Actions could

reasonably be expected to cause potential effects. The land use study area is generally bounded by Water Street to the north, Cranberry Street to the south, Brooklyn Bridge Park / Furman Street to the east, and Henry Street to the west (see **Figures B-1 and B-2**).

The analysis characterizes existing conditions in the study area in terms of land use, zoning, and public policy and evaluates land use, zoning, and public policy in the future without the Proposed Actions (the "No Action" condition) as compared to the future with the Proposed Actions (the "With Action" condition).

Various sources were used to comprehensively analyze the land use, zoning, and public policy characteristics of the study area, including land use and zoning maps, and online sources from the New York City Department of City Planning (DCP) and the New York City Department of Buildings (DOB).

C. EXISTING CONDITIONS

LAND USE

PROJECT AREA

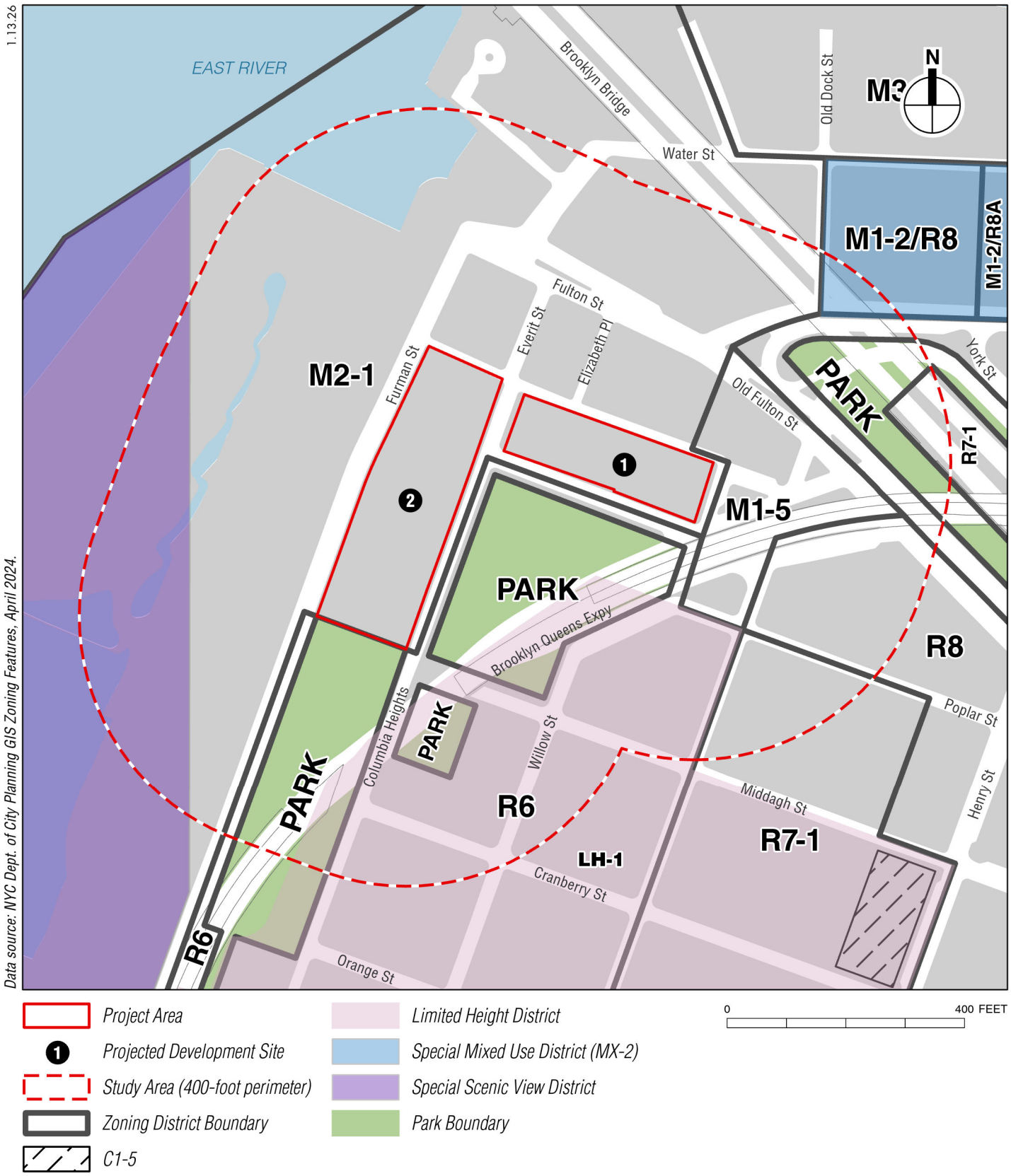
The Project Area consists of (i) Projected Development Site 1, a parcel located at 25 Columbia Heights (Block 204, Lot 1), comprising the block bounded by Columbia Heights, Vine Street, McKenny Street, and Doughty Street; and (ii) Projected Development Site 2, parcels located at 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12), comprising the block bounded by Columbia Heights, Doughty Street, Furman Street, and Squibb Park. The site encompasses a total lot area of approximately 101,720 square feet (sf). Projected Development Site 1 has approximately 341 feet of frontage on Vine Street, 336 feet of frontage on Doughty Street, 99 feet of frontage on McKenny Street, and 92 feet of frontage along Columbia Heights. Projected Development Site 2 has approximately 520 feet of frontage on Furman Street, 479 feet of frontage on Columbia Heights, and approximately 128 feet of frontage on Doughty Street. Overall, the Project Area consists of a total of five interconnected buildings historically used for manufacturing and commercial purposes.

The Project Area buildings were originally developed in the 1920s as a factory complex by E.R. Squibb & Sons Pharmaceutical Company. The buildings were sold in 1969 to the Watchtower Bible and Tract Society, which expanded and adapted the site in 1978, using it for various institutional functions including offices, storage, a trade school, and lodging. In 2016, the buildings were acquired by their current owner for commercial redevelopment but have since remained vacant. The buildings on Projected Development Sites 1 and 2 vary in height. Projected Development Site 1 is a 12-story commercial structure, and Projected Development Site 2 includes a 13-story building and three lower-scale buildings ranging from four to five stories in height.[1]

STUDY AREA

The 400-foot study area surrounding the Rezoning Area is located in the DUMBO neighborhood along Brooklyn's northern waterfront. It contains a diverse mix of land uses, including historic and

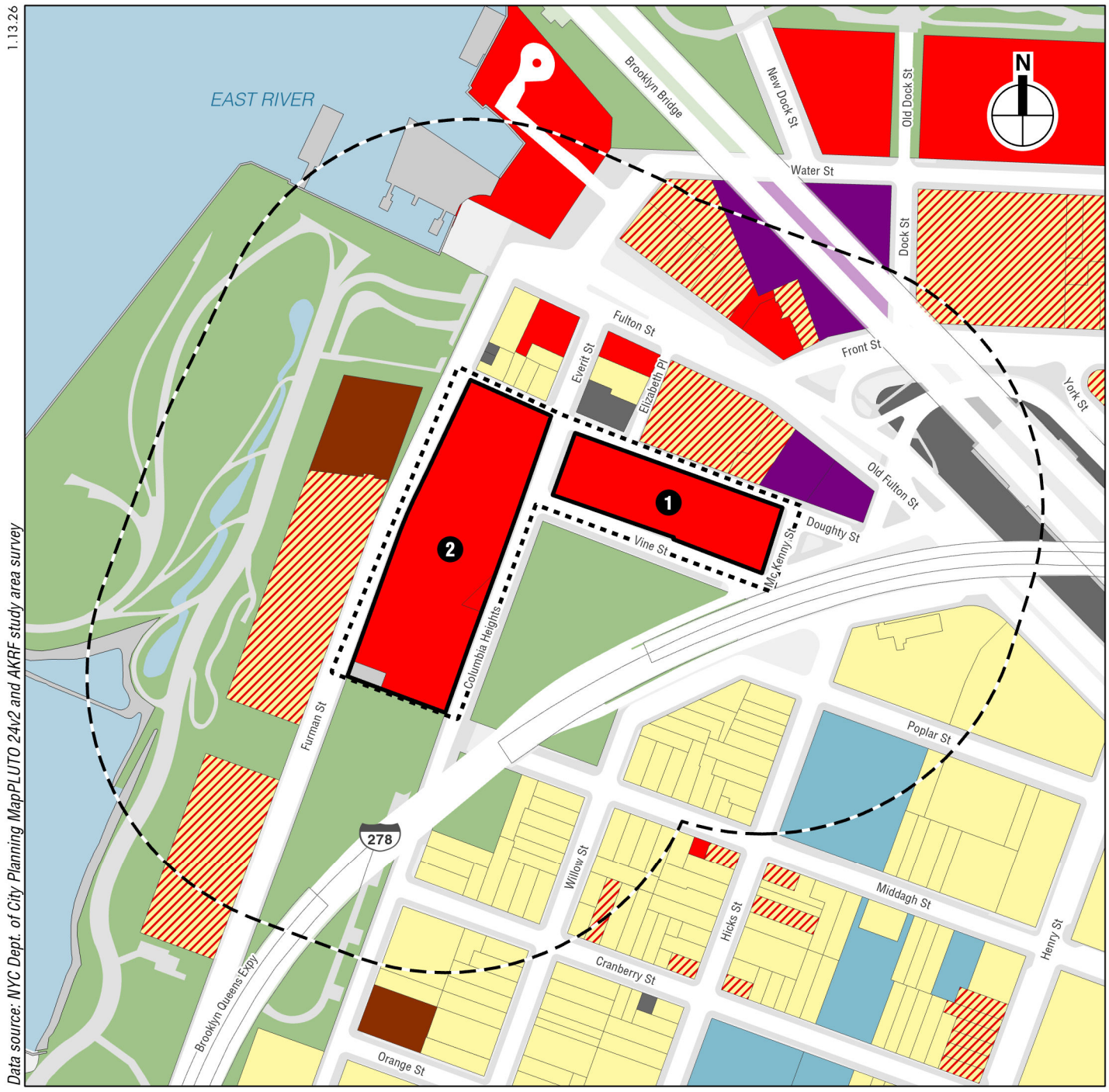
[1] To facilitate comparison between the existing and proposed conditions on the Development Site, all existing and proposed heights for the Projected Development Sites 1 and 2 are based on the applicable base plane under the proposed district regulations.



Existing Zoning

COLUMBIA HEIGHTS REZONING

Figure B-1



Existing Land Use

COLUMBIA HEIGHTS REZONING

Figure B-2

contemporary commercial, residential, and recreational uses. The study area includes portions of the Fulton Ferry Historic District. The study area includes key pieces of transportation infrastructure, such as the Brooklyn-Queens Expressway (BQE) and the East River Ferry terminal, as well as several major public open spaces, such as the Hillside Dog Park to the southeast of the Project Area, Squibb Park directly to the south, and Harry Chapin Playground and Brooklyn Bridge Park to the east and west, respectively (see **Figure B-2**). Brooklyn Bridge Park stretches along the East River waterfront and offers extensive public amenities. The study area features significant grade changes between Columbia Heights and Furman Street, bridged by Squibb Park Bridge, which connects the site to Brooklyn Bridge Park and the broader Brooklyn Heights Promenade network.

The broader study area includes a mix of low- to mid-rise commercial buildings, institutional uses, and residential structures ranging from 2 to 12 stories. Low-rise commercial buildings in the area typically feature ground-floor restaurants, boutique retail stores, cafés, and creative office space. North of Doughty Street, 28 Old Fulton Street is a three-story mixed-use building with retail space (currently a restaurant) on the ground floor and residential units above, reflecting the area's historic character and typical land use pattern. To the west of the study area, across from Furman Street, is a multi-building development known as Pierhouse. Pierhouse contains a mix of residential units and hotel uses, along with publicly accessible open space and ground-floor retail that activates the streetscape along Brooklyn Bridge Park and Furman Street.

The study area is well served by public transit, making the area highly accessible for residents and visitors. The East River Ferry terminal at Pier 1 provides regular service to Manhattan, Queens, and other Brooklyn neighborhoods. The High Street–Brooklyn Bridge subway station, served by the A and C trains, and the Clark Street subway station, served by the 2 and 3 trains, are located nearby to the southeast. The York Street subway station on the F train line is also located within walking distance to the east. Several bus routes, including the B25 (which operates between Broadway Junction and Fulton Ferry Landing), B67 (which operates between Kensington and Williamsburg), and B69 (which operates between Kensington and Downtown Brooklyn/DUMBO), run through or adjacent to the neighborhood, enhancing local connectivity.

ZONING

PROJECT AREA

As shown on **Figure B-1**, the Project Area is currently located in an existing M2-1 zoning district, which has been in place since the Zoning Resolution was adopted in 1961. M2-1 districts are considered medium-density manufacturing zones and allow for light industrial and limited commercial uses at a maximum FAR of 2.0. Residential uses are not permitted in M2-1 districts, and community facility uses are restricted to specific institutions such as museums. Parking requirements in these districts are generally high and vary based on use and size. Building heights are governed by a sky exposure plane, which begins at 60 feet (or four stories) above the street line, limiting the ability to construct taller or denser buildings. The existing buildings in the Project Area were originally developed in the 1920s, and are lawfully non-complying with respect to floor area and height and setback regulations.

STUDY AREA

The 400-foot study area includes a range of manufacturing, commercial, and residential zoning districts. These include the M2-1 district described above, an M1-5 manufacturing district which

permits a combination of light manufacturing and retail uses in formerly industrial areas (but still generally prohibits residential uses), and residential districts R6, R7-1, and R8 which allow medium- and high-density housing that can include new construction as well as existing multifamily buildings, rowhouses, and older tenements. With the addition of new qualifying affordable housing or qualifying senior housing, the permitted residential FAR may be higher, as indicated in **Table B-1**, below.

Southern portions of the study area are subject to the Limited Height District (LH-1), which restricts maximum building heights to 50 to 105 feet above curb level to preserve the established low-rise character of adjacent historic neighborhoods such as Brooklyn Heights.[2] Additionally, the western edge of the study area falls within the Brooklyn Heights Scenic View District (SV-1), a mapped scenic view district designated to protect views from the Brooklyn Heights Promenade across the East River to Lower Manhattan, Governors Island, the Statue of Liberty, and the Brooklyn Bridge. Within this overlay, no structure may penetrate the scenic view plane without a special permit from the City Planning Commission. The Project Area falls outside of both of these Special Districts.

The northeastern corner of the study area also includes a portion of the MX-2 Special Mixed-Use District at the intersection of Front Street and Dock Street, which combines an M1-2 manufacturing district with the medium-density residential district R8. MX Districts were established in 1997 to facilitate the transition of formerly industrial neighborhoods into mixed-use areas that can accommodate housing alongside commercial and light industrial activity that is compatible with residential areas. Residential uses are generally subject to the bulk controls of the governing residence district, in this case R8, while commercial, industrial, and community facilities are subject to M1 district bulk controls. The presence of this MX District within the study area sets a precedent for the adaptive reuse and partial enlargement of existing formerly industrial building stock to include both residential and commercial uses, as is proposed for the Rezoning Area.

Table B-1 summarizes the zoning districts in the study area.

Table B-1
Zoning Districts

Zoning District	Max. Base FAR/Building Height	Uses/Zone Type
M2-1	2.0	Manufacturing districts with restricted retail or residential conversions
M1-5	5.0	
MX-2 (M1-2/R8)	6.02 - 8.64* (residential)	Special Mixed-Use District
R6	2.2 - 3.9*	Built-up, medium-density residential districts with no parking requirements in the Inner Transit Zone
R7-1	3.44 - 5.01*	
R8	6.02 - 8.64*	
LH-1	Varies—maximum height may not exceed 50 to 105 feet above curb level	Limited Height District
SV-1	Varies—No structures are allowed to penetrate a scenic view plane except by special permit of the City Planning Commission	Brooklyn Heights Scenic View District

Note: * With qualifying affordable housing or qualifying senior housing
Source: *New York City Zoning Resolution*

[2] NYC Zoning Resolution, Article II: Residence District Regulations, Chapter 4: Bulk Regulations for Community Facilities in Residence Districts (ZR sec. 24-591)

PUBLIC POLICY

PLANYC: GETTING SUSTAINABILITY DONE/ONENYC 2050/PLANYC

PlaNYC: Getting Sustainability Done was released in 2023 and builds upon nearly two decades of strategic planning for a more sustainable, resilient, and equitable New York City. Prior to the 2023 report was OneNYC 2050, a long-term comprehensive strategic plan for New York City that addressed long-term challenges related to climate change, an evolving economy, and aging infrastructure. OneNYC 2050 was released in 2019 and built upon previous strategies and initiatives, such as One New York: The Plan for a Strong and Just City (OneNYC, 2017), which was the City's comprehensive strategy and policy directive aimed at sustainability, resiliency, and growth, PlaNYC: A Stronger, More Resilient New York (2013) and PlaNYC: A Greener, Greater New York (2007).

HOUSING OUR NEIGHBORS

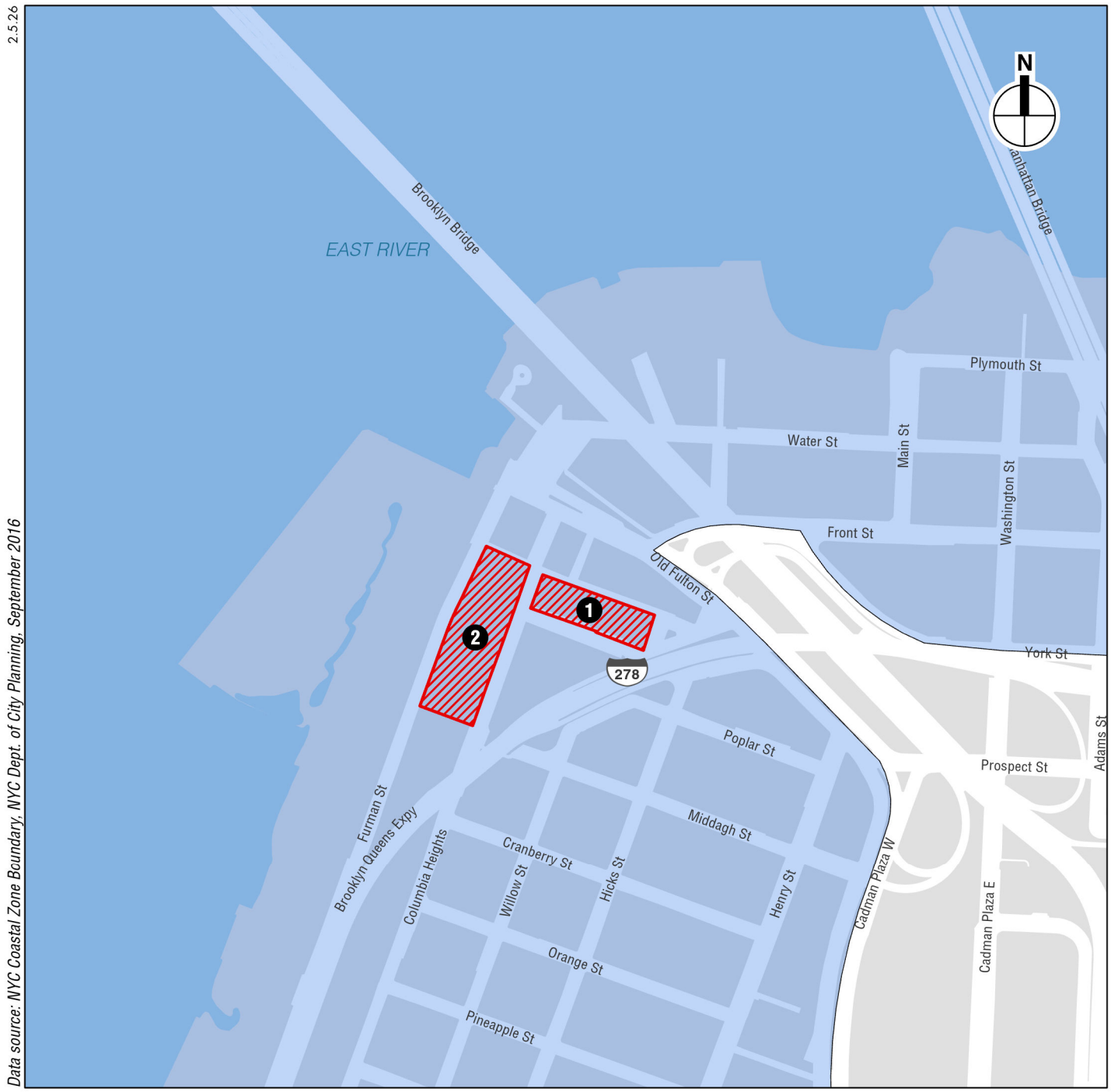
In June 2022, the Adams Administration released Housing Our Neighbors: A Blueprint for Housing and Homelessness, a citywide housing plan that focuses strategies and investment on the creation and preservation of high-quality, affordable housing for all New Yorkers, including seniors and households experiencing homelessness. Housing Our Neighbors encourages new housing supply throughout the City through critical investments in the City's affordable housing stock. It calls for the development of new affordable housing in neighborhoods with strong access to transit and jobs. The plan also calls for investments in infrastructure and services to support lower-income New York City households and help ensure that residents of all income levels have access to economic opportunity.

WHERE WE LIVE NYC PLAN

In 2020, the City released the first Where We Live NYC plan, which identified goals, strategies, and actions to expand housing opportunities for everyone. Where We Live NYC 2025 is NYC's second five-year plan to fight housing discrimination, confront segregation, and take action to advance opportunity for all. The six goals of Where We Live NYC 2025 include: fight housing discrimination and ensure equal access to housing; build more housing in all neighborhoods across New York City and the region; protect existing affordable housing and prevent displacement; ensure access to different types of neighborhoods for tenants using rental assistance; expand and improve housing options and accommodations for people with disabilities; and improve conditions, services and infrastructure in historically disinvested neighborhoods.

WATERFRONT REVITILIZATION PROGRAM (WRP)

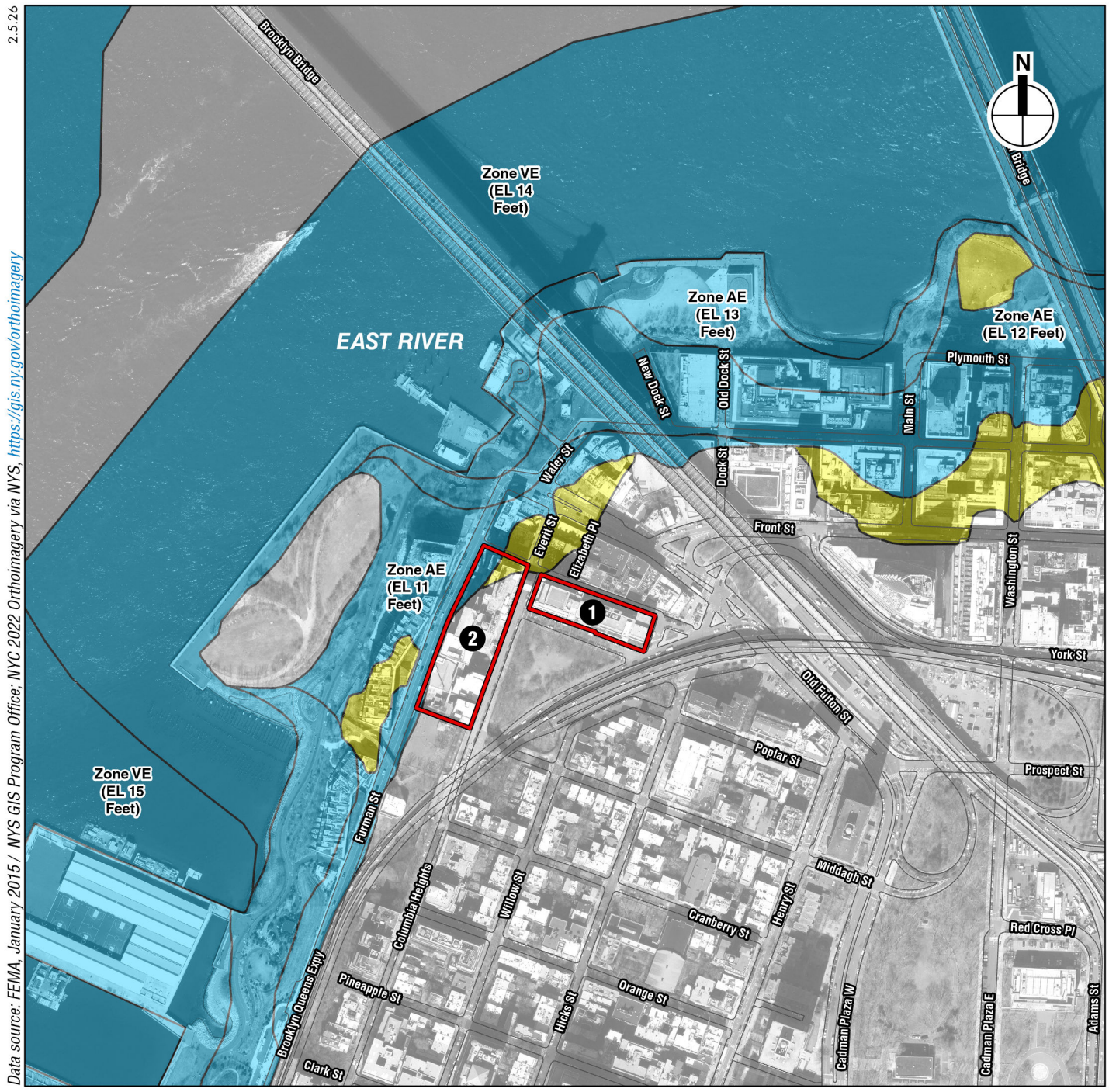
The Project Area is located within New York City's designated Coastal Zone and a portion of the site is located within a flood hazard zone (see **Figures B-4 and B-5**), and is subject to the policies of the City's WRP, adopted in 1982 and last updated in 2018. The WRP is the City's principal coastal management tool, aligning with state and federal coastal policies and promoting balanced waterfront development, public access, ecological protection, and climate resiliency. Relevant WRP policies include the redevelopment of underutilized sites, the provision of public amenities along the waterfront, and the mitigation of climate risks such as storm surge and flooding.



NYC Coastal Zone Boundary

COLUMBIA HEIGHTS REZONING

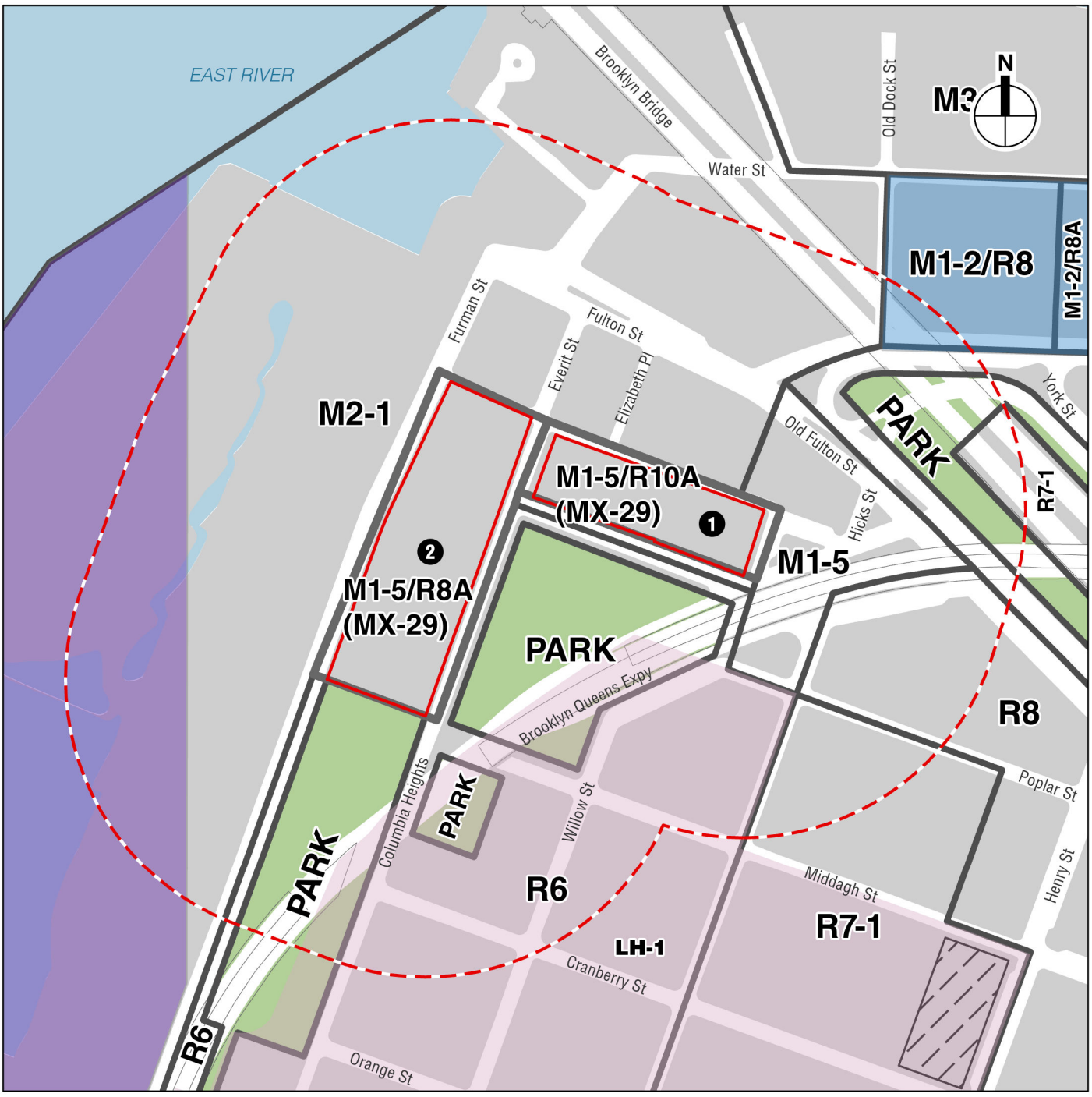
Figure B-3



FEMA Preliminary FIRM 2015

COLUMBIA HEIGHTS REZONING

Figure B-4



Proposed Zoning

COLUMBIA HEIGHTS REZONING

Figure B-5

NEW YORK CITY COMPREHENSIVE WATERFRONT PLAN

In 2021, the New York City Department of City Planning (DCP) released a 10-year vision for a more equitable, more resilient and healthier waterfront for all New Yorkers. The New York City Comprehensive Waterfront Plan (the "Plan") lays out goals to guide planning and policies for the New York City waterfront and waterways over the next decade and beyond. The Plan is organized by six interconnected and interdependent topic areas, each with its own vision for the next 10 years of the City's waterfront: Climate Resiliency and Adaptation; Waterfront Public Access: Economic Opportunity; Water Quality and Natural Resources; Ferries; and Governance. It builds upon earlier efforts like the 2011 update to the Comprehensive Waterfront Plan that was released as Vision 2020, prepared in partnership with State and federal agencies, including the New York State Department of Environmental Conservation (DEC), the Port Authority of New York and New Jersey (PANYNJ) and the U.S. Army Corps of Engineers (USACE). Specific strategies outlined in the Vision 2020 included improvements for each of the City's 22 waterfront reaches, including the rivers, inlets, and bays, active ports, residential neighborhoods, wetlands and public open spaces.

DUMBO BUSINESS IMPROVEMENT DISTRICT (BID)

Established in 2006, the DUMBO BID is a nonprofit organization dedicated to enhancing the neighborhood's public spaces, economic vitality, and cultural life. The BID manages sanitation services, public programming, streetscape improvements, and business support, while promoting DUMBO as a creative and tech-driven hub. Its initiatives include beautification efforts, pedestrian and cyclist enhancements, seasonal events, and partnerships with arts and community organizations. The organization has also been instrumental in advocating for and managing large-scale infrastructure projects in the area, such as the restoration of Belgian block streets and water/sewer upgrades. The BID supports over 1,350 ground-floor retail businesses, helping to transform the DUMBO neighborhood into a commercial hub.[3] The DUMBO BID boundary extends to the Manhattan Bridge to the north, York Street to the south, Bridge Street to the east, and the BQE to the west. The Project Area is not located within the DUMBO BID but is directly adjacent to the district, about one block to the west.

D. THE FUTURE WITHOUT THE PROPOSED ACTIONS

LAND USE

PROJECT AREA

As described in Attachment A, "Project Description and Additional Information," in the No Action condition, the approximately 296,000 sf of commercial space at Projected Development Site 1 and approximately 399,000 sf of commercial space at Projected Development Site 2 would be retenanted with complying commercial uses in the existing buildings. These uses are permitted under existing zoning and no discretionary actions would be required. The approximately 46,000 sf of parking space (125 parking spaces) at Projected Development Site 1 would remain. Absent the opportunity for residential use that would be allowed by the Proposed Actions, the Applicant

[3] https://www.nyc.gov/site/sbs/neighborhoods/bid-directory.page?bid=52

would lease space in the buildings for conforming commercial uses, consistent with market conditions.

STUDY AREA

Within the study area there are three permitted applications and one filed application for residential alterations. At 11 Cranberry Street and 12 Middagh Street, alteration applications have been permitted to convert two-family dwellings into single-family dwellings; at 24 Middagh Street, a three-family dwelling is being converted into a single-family dwelling. At 29 Willow Street, which is not yet permitted, the filed plans are for a single-family residence. The planned alterations within the study area would not add any additional dwelling units and would remove three existing dwelling units from the market.

ZONING

No changes in zoning are anticipated in the No Action condition. As noted above, the existing buildings in the Project Area were originally developed in the 1920s, and are lawfully non-complying with respect to floor area and height and setback regulations, and the Project Area would be retenanted under the existing zoning rules.

PUBLIC POLICY

No new public policies or modifications to current public policies applicable to the Project Area or the study area are expected in the No Action condition.

The expansion of current commercial use under the No Action condition would indirectly support the goals of the WRP and DUMBO BID by revitalizing an underused site and increasing pedestrian traffic near both policy areas.

E. THE FUTURE WITH THE PROPOSED ACTIONS

LAND USE

PROJECT AREA

The Proposed Actions would facilitate the redevelopment of the Project Area buildings through the designation of a new MX District to allow residential, commercial, and community facility uses. The Proposed Actions would result in the adaptive reuse and partial enlargement of the five existing buildings on the Project Area, most of which are currently vacant, formerly industrial structures. As described in Attachment A, “Project Description and Additional Information,” with the Applicant’s Proposed Development, Projected Development Site 1 would be enlarged from 12 stories (141 feet) to 17 stories (210 feet) with approximately 460,570 gsf, of which approximately 399,710 gsf would be residential use (392 units), with 79 to 118 affordable units depending on the MIH option selected, 14,850 gsf would be commercial and/or community facility use, and 46,010 gsf would be accessory residential parking. The proposed conversion and enlargement of Projected Development Site 2 would result in a partial enlargement of the northern building to a maximum height of approximately 14 stories (approximately 154 feet, which is the height of the 14th-story vestibule and support space that would be provided for common roof access), with other portions of the building enlarged to a maximum height of 13 stories (approximately 141 feet). The three smaller buildings (commercial buildings of 4-5 stories and

39-53 feet) would not have any change in bulk or use. Following the proposed conversion and enlargement, Projected Development Site 2 would contain approximately 464,710 gsf (6.11 FAR), of which approximately 278,390 gsf would be residential use (269 units), with 54 to 81 affordable units depending on the MIH option selected, 171,320 gsf would be commercial and/or community facility use, and 15,000 gsf would be accessory residential parking.

The Applicant's Proposed Development would not fully utilize available FAR under the proposed rezoning on Projected Development Site 2. However, as described in Attachment A, "Project Description and Additional Information," and above, in order to present a conservative analysis, a RWCDS is considered in the analyses that assumes full utilization of allowable FAR under the proposed zoning districts, with massing that reflects the achievement of full FAR utilization with efficient and practicable floorplates that conform with industry standards for residential use. Overall, the RWCDS for the EAS includes approximately 1,005,480 gsf of total development, consisting of approximately 758,300 gsf of new residential space and 716 total dwelling units, of which approximately 144 to 216 would be permanently affordable units depending on the MIH option selected, as well as approximately 186,170 gsf of local retail and office space and 61,010 sf of parking, containing 188 parking spaces.

In contrast to the No Action condition, which would retain current uses, the Proposed Actions would contribute to the adaptive reuse of architecturally significant structures into retail, community, and residential uses. The Applicant believes that these new housing opportunities would not only provide much needed affordable housing in the area, but would also facilitate street-level activity and strengthen the consumer base of existing businesses in the area. The Proposed Actions, which would facilitate residential, commercial, and possibly community facility development, would be compatible with the mixed-use character of the surrounding area that contains similar uses and consistent with evolving land use and development patterns observed in DUMBO and Brooklyn Heights. Therefore, no significant adverse land use impacts would result in the Project Area.

STUDY AREA

The Proposed Actions would only apply to the Rezoning Area and would not alter the zoning regulations applicable to other properties within the 400-foot study area. However, the proposed MX District would be compatible with existing zoning districts in the vicinity, including nearby MX-2 (M1-2/R8), R7, and R8 districts, which already support residential and mixed-use development. The Proposed Actions would be compatible with the character of the overall study area, and reflect broader land use trends in the neighborhood, where many formerly industrial and commercial uses have been redeveloped for residential and community-serving uses. Overall, the Proposed Actions would not result in significant adverse zoning impacts.

ZONING

PROJECT AREA

The existing zoning does not permit housing production or mixed-use development. Accordingly, the Proposed Actions include a zoning map amendment to change the site's designation to M1-5A/R10A and M1-5A/R8A within a new MX District, allowing residential and commercial uses at higher densities, including the implementation of the City's MIH program (see **Figure B-3**). The proposed M1-5A/R10A(MX) district for Projected Development Site 1 would allow maximum FARs of 12.0 for residential use and 6.5 for commercial use, with a maximum base height of 155 feet

and a maximum building height of 293 feet (increased from the standard maximum building height of 235 feet, since the zoning lot has a lot area of more than 20,000 sf). The proposed M1-5A/R8A(MX) district for Projected Development Site 2 would allow maximum FARs of 7.2 for residential use and 6.5 for commercial use, with a maximum base height of 155 feet and a maximum building height of 256 feet (increased from the standard maximum building height of 205 feet, since the zoning lot has a lot area of more than 20,000 sf).The Proposed Actions would remove constraints under the existing M2-1 zoning and introduce a regulatory framework that better reflects recent development trends in the study area. Therefore, the Proposed Actions would not result in any significant adverse impacts to zoning in the Rezoning Area.

STUDY AREA

The Proposed Actions would apply only to the Rezoning Area and would not affect the underlying zoning of adjacent properties in the 400-foot study area. The proposed zoning changes would be consistent with other zoning districts in the vicinity, including the presence of the MX-2 (M1-2/R8) district to the north, and existing R7 and R8 districts to the east, at a higher permitted density since maximum FARs of 7.2 and 12.0, respectively, would be permitted.

The Proposed Actions would not result in any significant adverse impacts to zoning within the surrounding study area. The introduction of an MX District in the Rezoning Area would align with the existing MX-2 district and would not conflict with the prevailing land use or development context in adjacent areas.

PUBLIC POLICY

The Proposed Actions would be consistent with, and supportive of, several key public policy frameworks applicable to the Project Area and the broader study area. Overall, the Proposed Actions would not result in any significant adverse impacts to public policy.

PLANYC: GETTING SUSTAINABILITY DONE/ONENYC 2050/PLANYC

The Proposed Actions support the goals of PlaNYC: Getting Sustainability Done. In particular, the Proposed Project would implement flood proofing and resiliency measures as required by NYC Building Code that would be designed to resist hydrostatic, hydrodynamic, and other flood-related loads, including the effects of buoyancy. All space below the Design Flood Elevation (DFE) would be floodproofed using flood-damage resistant materials and construction techniques. All critical mechanical equipment would be elevated to or above the DFE. Any occupiable residential space would be at or above the DFE throughout the life of the buildings. Additionally, flood barriers would be used to prevent the ingress of floodwaters. Therefore, the Proposed Actions would be in support of the PlaNYC: Getting Sustainability Done.

HOUSING OUR NEIGHBORS

The Proposed Actions support the goals and principles outlined in Housing Our Neighbors by developing permanently affordable housing in a neighborhood with strong access to transit and jobs. The Proposed Actions would result in 716 dwelling units (of which approximately 179 would be permanently affordable units). Therefore, the Proposed Project would be supportive of the Housing Our Neighbors plan.

WHERE WE LIVE NYC PLAN

The Proposed Actions support the goals of Where We Live NYC 20205 by building new housing and introducing new affordable units in New York City. Therefore, the Proposed Project would be in support of Where We Live NYC 2025.

WATERFRONT REVITALIZATION POLICIES (WRP)

The Project Area is within the boundaries of the New York City Coastal Zone; therefore, the Proposed Actions must be reviewed by the CPC, in its capacity as the City Coastal Commission, to determine whether the Proposed Actions are consistent with WRP policies. An assessment of the Proposed Actions' consistency with New York City's WRP will be prepared and discussed in the EIS.

NEW YORK CITY COMPREHENSIVE WATERFRONT PLAN

The Proposed Actions are supportive of the 2021 NYC Comprehensive Waterfront Plan. The Proposed Actions would support the goal to create an equitable waterfront by creating new market rate and affordable units in the Project Area. The Proposed Actions would provide housing opportunities to low-income households near a waterfront park, allowing greater access and use. The Proposed Project also would be consistent with the Plan's vision for resiliency by resulting in buildings developed with flood proofing and resiliency measures in accordance with the requirements of Appendix G.

DUMBO BUSINESS IMPROVEMENT DISTRICT (BID)

The Proposed Actions would support the economic development and neighborhood vitality goals of the adjacent DUMBO BID by bringing new residents and foot traffic into the area, which in turn would benefit local businesses. The Proposed Development's new dwelling units and commercial uses would help expand the district's consumer base, attract additional retail spending, and support activation of the surrounding streetscape. ✴

Attachment C: Socioeconomic Conditions

A. INTRODUCTION

This attachment describes the socioeconomic changes that could result from the Proposed Actions and assesses whether such changes could result in significant adverse impacts as compared to what would happen in the future without the project. As described in the 2025 *City Environmental Quality Review (CEQR) Technical Manual*, the socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements.

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project") at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2") (together, the "Project Area"). As described in Attachment A, "Project Description," a Reasonable Worst-Case Development Scenario (RWCDS) was developed assuming full utilization of allowable floor area ratio (FAR) and maximum building heights under the proposed zoning districts, even though the Proposed Development would not utilize all floor area permitted under the proposed rezoning on Projected Development Site 2. The RWCDS for the EAS includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

PRINCIPAL CONCLUSIONS

In accordance with guidance from the *CEQR Technical Manual*, this socioeconomic assessment considers five ways in which the Proposed Actions could alter socioeconomic conditions: (1) direct residential displacement; (2) direct business and institutional displacement; (3) indirect residential displacement; (4) indirect business and institutional displacement; and (5) adverse effects on specific industries. This assessment finds that the Proposed Actions would not result in significant adverse socioeconomic impacts.

B. METHODOLOGY

In accordance with the *CEQR Technical Manual*, the objective of a socioeconomic conditions analysis is to determine whether any changes resulting from a project would have a significant adverse impact when comparing the future without the Proposed Actions (the "No Action" condition) and the future with the Proposed Actions (the "With Action" condition). Even when socioeconomic changes would not result in impacts under CEQR, they are disclosed if they would

affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area.

Changes to an area's socioeconomic character may occur directly or indirectly because of a project. Direct (or primary) displacement is defined by CEQR as the involuntary displacement of residents or businesses from a site or sites directly affected by a Proposed Actions. Examples of direct displacement include the proposed redevelopment of a currently occupied parcel for a new use or structure, or a proposed easement or right-of-way that would take a portion of a parcel, rendering it unfit for its current use.

Indirect (or secondary) displacement is defined by CEQR as the involuntary displacement of residents, businesses, or employees that results from a change in socioeconomic conditions created by a proposed action. Examples of indirect displacement include lower-income residents forced out due to rising rents caused by a new concentration of higher-income housing introduced by a project, or a similar turnover of industrial uses being forced out in favor of higher-paying commercial tenants attracted to an area because of a successful office project.

If a project does not affect an area's socioeconomic characteristics directly or indirectly, it may still affect the operation of a major industry or commercial operation in the City. An example would be the implementation of new regulations that restrict a certain process that is vital to a particular industry. In these cases, the effect of a project on a particular industry is analyzed.

Following *CEQR Technical Manual* guidelines, this socioeconomic analysis begins with a screening assessment that determines the need for a preliminary assessment by evaluating the Proposed Actions' potential to lead to socioeconomic change in the study area. A preliminary assessment is conducted to learn enough about the potential effects of a proposed action to either rule out the possibility of significant adverse impacts or determine that a more detailed analysis is required to fully determine the extent of the impacts. For this analysis, a preliminary assessment was conducted for indirect residential displacement. When appropriate, a detailed analysis examines existing conditions and then evaluates the changes to those conditions in the No Action and With Action conditions. For this analysis, the results of screening and preliminary assessments were enough to rule out the possibility of significant adverse impacts.

DETERMINING WHETHER A SOCIOECONOMIC ASSESSMENT IS APPROPRIATE

This section presents the *CEQR Technical Manual* threshold circumstances that can lead to socioeconomic changes warranting further analysis and compares those circumstances (presented in bold italics below) to the Proposed Actions.

DIRECT RESIDENTIAL DISPLACEMENT

Would the project directly displace population to the extent that the socioeconomic character of the neighborhood would be substantially altered? Displacement of less than 500 existing residents would not typically be expected to alter the socioeconomic character of a neighborhood. For projects exceeding this threshold, assessments of direct residential displacement, indirect residential displacement, and indirect business displacement are appropriate.

The Project Area contains no residential dwelling units and therefore, the Proposed Actions would not exceed the *CEQR Technical Manual* analysis threshold of 500 displaced residents. The Proposed Actions are not expected to result in significant adverse impacts due to direct residential

displacement and further assessment of effects from direct residential displacement is not warranted.

DIRECT BUSINESS DISPLACEMENT

Would the project directly displace more than 100 existing employees, or would it displace any business that is unusually important because its products or services are uniquely dependent on its location, are the subject of policies or plans aimed at its preservation, or that serves a population uniquely dependent on its services in its present location? For projects exceeding these thresholds, assessment of direct business displacement and indirect business displacement are appropriate.

The Proposed Actions would result in a partial residential conversion of two commercial buildings with a total commercial square footage of approximately 695,000 gross square feet (gsf). The building located on Projected Development Site 2 (approximately 399,000 gsf) is entirely vacant, having no businesses operating on-site. The approximately 296,000-sf building located on Projected Development Site 1 is largely vacant with one potentially displaced business, a 125-space public parking garage, operating on-site.[1] It is estimated that three employees support the service offerings of this single business—well below the 100-employee threshold for preliminary assessment under CEQR. In addition, the services offered by the potentially displaced business do not represent an unusually important operation, nor does it serve a population uniquely dependent upon its services remaining in its present location, there are a variety of other parking services within a reasonable trade area. Therefore, the Proposed Actions would not result in significant adverse impacts due to direct business displacement and further assessment of the potential effects from direct business displacement is not warranted.

INDIRECT RESIDENTIAL DISPLACEMENT

Would the project result in substantial new residential development? Residential development of 250 units or less and displacement of less than 500 existing residents would not result in significant socioeconomic effects. For projects exceeding this threshold, an assessment of indirect residential displacement is appropriate.

By 2029, under the RWCDS, the Proposed Actions would result in the incremental development of 716 dwelling units, which exceeds the CEQR threshold of 250 dwelling units, warranting further analysis of indirect residential displacement (see Section C, “Preliminary Assessment”).

INDIRECT BUSINESS DISPLACEMENT DUE TO INCREASED RENTS

Would the project result in substantial new commercial development that is markedly different from existing uses, development, and activities within the neighborhood? Typically, commercial development of 200,000 sf or less would not have significant adverse socioeconomic effects. For projects exceeding this threshold, an assessment of indirect business displacement is appropriate.

The Proposed Actions would result in a loss of approximately 508,000 sf of commercial space and therefore would not exceed this threshold.

[1] Firm and employment estimates are based on AKRF field observations conducted in June 2025 and standard industry employment density ratios commonly used for CEQR analysis.

INDIRECT BUSINESS DISPLACEMENT DUE TO RETAIL MARKET SATURATION

Would the project add to or create a retail concentration that may draw a substantial number of sales from existing businesses within the study area to the extent that certain categories of business close and vacancies in the area increase, thus resulting in a potential for disinvestment on local retail streets? Projects resulting in less than 200,000 sf of retail on a single development site would not typically result in socioeconomic impacts. For projects exceeding these thresholds, an assessment of the indirect business displacement due to market saturation is appropriate.

The Proposed Actions would not result in an increase of 200,000 sf of retail; therefore, the Proposed Actions would not have the potential to result in disinvestment on local retail streets due to retail market saturation and associated competitive effects, and further analysis of indirect business displacement due to market saturation is not warranted.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

Is the project expected to affect conditions within a specific industry? An analysis is warranted if a substantial number of residents or workers depend on the goods or services provided by the affected businesses or if it would result in the loss or substantial diminishment of a particularly important product or service within the industry.

As noted above in the responses to direct and indirect business displacement screenings, the Proposed Actions would not result in indirect business displacement and the potentially displaced business, a parking services facility, is not considered unusually important, as detailed above. As such, an assessment of adverse effects on specific industries is not warranted.

Based on the above screening assessment, the Proposed Actions warrant further assessment of indirect residential displacement.

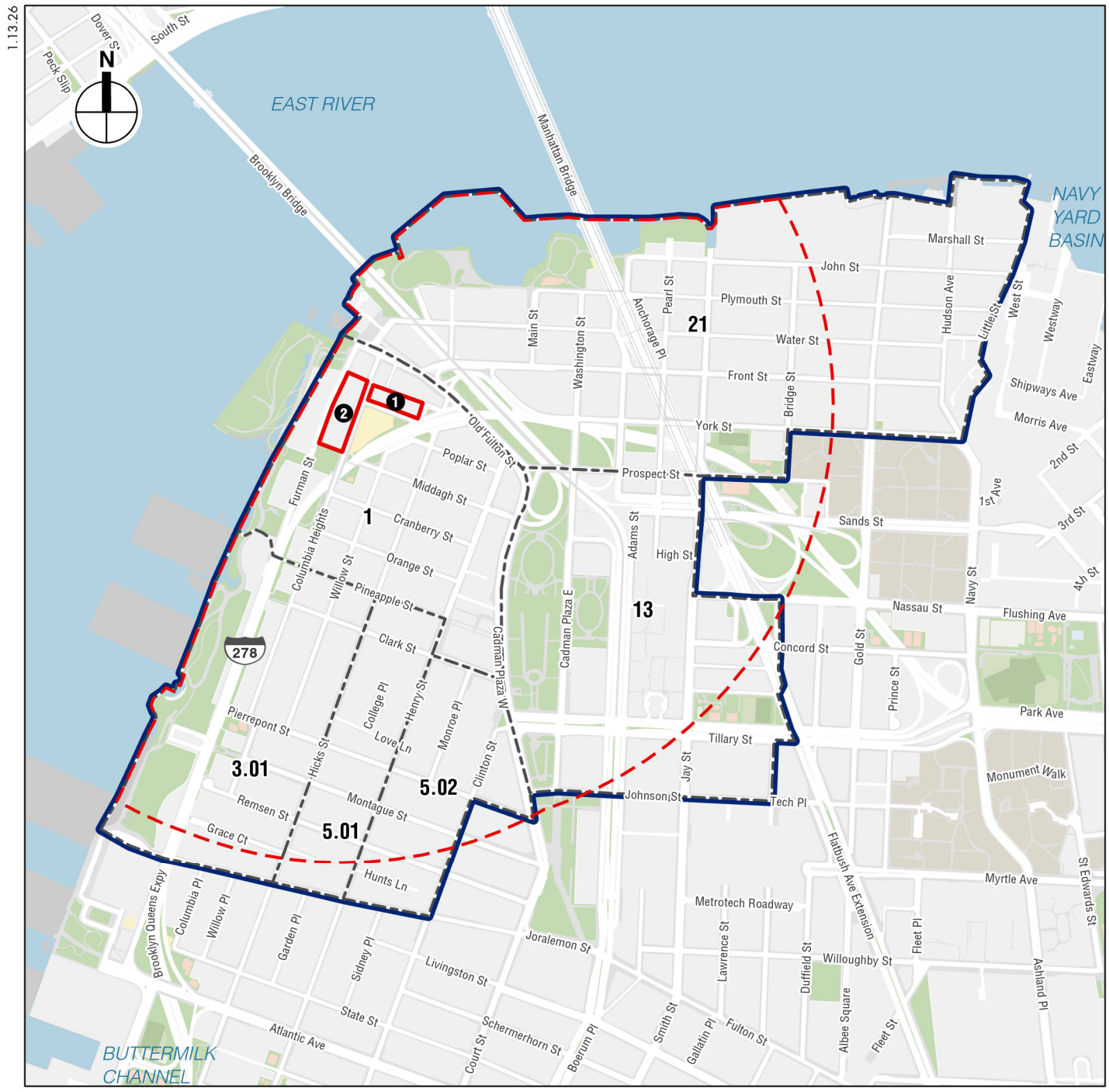
STUDY AREA DEFINITION

A socioeconomic study area is the area within which a project has the greatest potential to directly or indirectly affect population, housing, and economic activities. A study area typically encompasses a project area and adjacent areas within approximately 400 feet, ¼ mile, or ½ mile, depending on the project size and area characteristics. According to the *CEQR Technical Manual*, the larger ½-mile study area is appropriate for projects that would potentially increase the No Action condition population in the ¼-mile area by more than 5 percent. The Proposed Development would increase the ¼-mile No Action condition population by approximately 1,453 people, an approximate 30 percent increase; therefore, a ½-mile study area is appropriate.[2]

Because socioeconomic analyses depend on demographic data, it is appropriate to adjust the study area boundary to conform to the census tract delineation that most closely approximates the desired radius (in this case, a ½-mile radius surrounding the Project Area). For this analysis, there are six census tracts that comprise the "socioeconomic study area," or "study area," as shown on **Figure C-1**.[3] The socioeconomic study area is located within Brooklyn Community

[2] The estimated population increase in the RWCDS is estimated using the average household size for Brooklyn CD 2 (2.02 in Census 2020, the latest available data from the DCP Population FactFinder) and the number of incremental dwelling units introduced by the Proposed Action (716).

[3] The ½-mile study area comprises the following Brooklyn census tracts: 1, 3.01, 5.01, 5.02, 13, and 21.



Socioeconomic Study Area

COLUMBIA HEIGHTS REZONING

Figure C-1

District (CD) 2 and is generally bounded to the south by Joralemon Street and extends north to Marshall Street, between the Brooklyn Bridge Park Greenway to the west and Little Street to the east.

DATA SOURCES

Information used in the analyses of indirect residential displacement—including population, housing, rents, and incomes—was gathered from the U.S. Census Bureau's 2006–2010 and 2019–2023 American Community Survey (ACS) using the New York City Department of City Planning (DCP) Population FactFinder. The DCP Population FactFinder online mapping tool was used to provide comparative census data between geographies and to determine the margin of error (MOE) for single variable ACS estimates presented for the study area.[4] Social Explorer was used to collect comparative census data not offered through the DCP Population FactFinder for geographies within the study area. Social Explorer is a demographic data visualization and research website that agglomerates a variety of data including data from the U.S. census and ACS. Study area market rate asking rents were researched using online real estate listing sites, including StreetEasy. StreetEasy is a searchable online database that uses web data extraction to compile an aggregated list of residential property listings from most of New York City's largest brokerage firms and hundreds of small-scale brokers.

The above-described data were supplemented by field surveys conducted by AKRF staff during the summer of 2025. During the field surveys, AKRF staff characterized land uses and economic activities. Further, AKRF staff identified businesses that could be directly displaced by projected development. AKRF staff field surveys were supplemented by online information, including websites of businesses that would be directly displaced by projected development. Employment estimates are based on a combination of online research of individual businesses, AKRF field observations, and standard industry employment density ratios commonly used for CEQR analysis. Employment density ratio calculations are based partly on the size of the building in which a business is located.

C. PRELIMINARY ASSESSMENT

INDIRECT RESIDENTIAL DISPLACEMENT

Based on the screening assessment, the Proposed Actions warranted further assessment of indirect residential displacement. As described in the *CEQR Technical Manual*, indirect residential displacement usually occurs when a project results in a substantial new development that is markedly different from existing uses and activities within a neighborhood. This can contribute to increased property values and increased rents, which can make it difficult for some existing residents to remain in their homes. Generally, an indirect residential displacement analysis is conducted only in cases in which the potential impact may be experienced by renters living in privately held dwelling units unprotected by rent control, rent stabilization, or other government regulations restricting rents, and whose income or poverty status indicates that they may not

[4] MOEs describe the precision of an estimate within a 90-percent confidence interval and provide an idea of how much variability (i.e., sampling error) is associated with the estimate. The larger the MOE relative to the size of the estimate, the greater potential for variability within the data. The MOE is partially dependent on the sample size, because larger sample sizes result in a greater amount of information that more closely approximates the population.

withstand substantial rent increases. Residents who are homeowners, or who are renters living in rent-protected dwelling units, are not considered potentially vulnerable populations under CEQR.

This analysis follows the step-by-step assessment guidelines of the *CEQR Technical Manual*.

Step 1. Determine if the project would result in a population increase large enough relative to the size of the population expected to reside in the study area without the project to affect real estate market conditions in the study area.

According to *CEQR Technical Manual* analysis thresholds, if the population increase is 5 percent or greater within the study area, the incremental population may be large enough to affect real estate market conditions, and Step 2 of the preliminary assessment would be warranted. If the population increase is more than 10 percent in the study area, a detailed analysis is warranted.

According to the 2020 U.S. Decennial Census, as of April 1, 2020 the socioeconomic study area had a population of 23,950 residents. The DCP housing database identified 2,019 net units built since April 1, 2020. Assuming a 93.2 percent occupancy rate (from the CEQR Data Hub Housing and Population Projections dataset), these DUs can be expected to have added 3,822 residents to the study area, bringing the estimated 2026 study area population to 27,772 residents (see **Table C-1**).

By 2029, an additional approximately 263 DUs are anticipated to be added to the study area. As shown in **Table C-1**, the addition of these units to the study area is expected to bring the total population to 28,303 in 2029, a 1.9 percent increase over the 2026 estimated population.

Table C-1
Population Estimates and Projections
Existing Conditions and Future Without the Proposed Actions

	2020 Census Population Estimate	Population Derived from Housing Completions Since 2020 Census	2026 Study Area Population Estimate	2029 Population Projection No Action Condition	Change from 2026 to 2029 No Action Condition (in percent)
Study Area	23,950	3,822	27,772	28,303	1.9%

Note:
1. The 2029 projected population is based on the DCP Housing Database available through the CEQR Data Hub and on an average household size of 2.02 persons per DU (average for Brooklyn CD 2). This data was supplemented by Active Major Construction data.

Source: 2020 Decennial Census; DCP Housing Database. Accessed through the CEQR Data Hub: https://nycplanning.github.io/ceqr-data-hub/

In the With Action condition, under the RWCDS by 2029 the projected study area population is estimated to be 29,749, representing a 5.1 percent change from the 2029 study area population projections under the No Action condition (see **Table C-2**).

Table C-2
With Action Condition Population

	2029 Population Projections No Action Condition	Number of Incremental DUs	Projected Population Increase from With Action Dwelling Units	2029 Population Projections With Action Condition	Percent Change from 2029 With Action Condition
Study Area	28,303	716	1,446	29,749	5.11%

Note: The 2029 projected population and the With Action population are available through the CEQR Data Hub and are based on an average household size of 2.02 persons per DU (average for Brooklyn CD 2). An occupancy rate of 93.2 percent has been applied, per the CEQR Data Hub.
Source: 2020 Decennial Census; DCP Housing Database. Accessed through the CEQR Data Hub: https://nycplanning.github.io/ceqr-data-hub/

Based on *CEQR Technical Manual* guidance, the population introduced by the Proposed Actions may be large enough to affect real estate market conditions in the study area. As population growth in the study area in the With Action condition would exceed the No Action condition by more than 5 percent, Step 2 of the preliminary assessment is warranted.

Step 2. Determine if the project would add new population with higher average incomes compared to the average incomes of the existing populations and any new population expected to reside in the study area without the project.

EXISTING CONDITIONS AND TRENDS

Household income characteristics for the study area population are described using the average and median household incomes. The average household income is calculated by dividing the aggregate income by the total number of households in the study area. The presence of high-income households raises the average income, sometimes substantially higher than the median household incomes in the study area. Therefore, the median household income is also presented as it represents an estimate of the midpoint of all household incomes in the study area.

As shown in **Table C-3** based on the U.S. Census Bureau's 2019–2023 ACS 5-year estimate, the estimated average household income for the study area is $292,339, which is greater than that of Brooklyn ($210,397) and New York City ($127,894) overall. Average incomes in the study area have increased since 2010, although the magnitude of change cannot be confidently reported. The estimated median household income for the study area is greater than $200,000, although the exact value cannot be accurately estimated.

Table C-3
Household Income Characteristics (2006–2010, 2019–2023 ACS)

Area	Average Household Income[1]			Median Household Income[1]		
	2006–2010 ACS	2019–2023 ACS	Change or Direction of Change[2]	2006–2010 ACS	2019–2023 ACS	Change or Direction of Change[2]
Socioeconomic Study Area	$234,043	$292,339	Increase	$144,978	$200,000+[3]	N/A
Brooklyn	$156,608	$210,397	34.3%	$98,648	$145,094	47.1%
New York City	$109,437	$127,894	16.9%	$70,645	$79,713	12.8%

Notes:
[1] All dollar figures are represented in 2023 dollars.
[2] If the MOE of the difference between the 2006–2010 and 2019–2023 ACS data is greater than the difference, a change cannot be reported with confidence; if the MOE of the difference is greater than one third of the difference, a change cannot be estimated with confidence and only the direction of the change can be reported (i.e., Increase/Decrease).
[3] More than half of the population falls into the highest income category (>$200,000). Because the median is calculated using linear interpolation within a range, and this top category has no upper bound, the median cannot be reliably estimated.
Sources: U.S. Census Bureau, ACS 2006–2010 and 2019–2023 5-Year Estimates via DCP's NYC Population FactFinder.

Based on the U.S. Census Bureau's 2006–2010 and 2019–2023 ACS 5-year estimates, residential rents have increased throughout the study area since 2010, although the magnitude of change cannot be confidently reported (see **Table C-4**). The average and median gross rents in the study area are greater than those of Brooklyn and New York City overall.

Table C-4
Average and Median Gross Rents (2006–2010, 2019–2023 ACS)

Area	Average Gross Rent			Median Gross Rent		
	2006–2010 ACS[1]	2019–2023 ACS[1]	Change or Direction of Change[2]	2006–2010 ACS[1]	2019–2023 ACS[1]	Change or Direction of Change[2]
Socioeconomic Study Area	$2,460	$3,652	Increase	$2,292	$3,260	Increase
Brooklyn	$1,489	$1,946	30.7%	$1,434	$1,784	24.4%
New York City	$1,651	$1,996	20.9%	$1,505	$1,779	18.2%

Notes:
[1] All dollar figures are represented in 2023 dollars.
[2] If the MOE of the difference between the 2006–2010 and 2019–2023 ACS data is greater than the difference, a change cannot be reported with confidence; if the MOE of the difference is greater than one third of the difference, a change cannot be estimated with confidence and only the direction of the change can be reported (i.e., Increase/Decrease).
Sources:
U.S. Census Bureau, 2006–2010 and 2019–2023 ACS 5-Year Estimates DCP's NYC Population FactFinder.

U.S. census data do not provide specific rent information according to regulation status or unit size but instead can paint a general picture about the rate at which housing costs are changing in a neighborhood. Market comparables were therefore used to provide a fuller understanding of current market rate rents. **Table C-5** summarizes online listings for market rate apartments for the study area. The average, median, and third quartile rents presented in the table were calculated based on market rate rental units and are generally much higher than the data presented by the ACS.

Table C-5
Asking Rents in the Socioeconomic Study Area

	Studio	1BR	2BR	3BR or more
Average	$3,779	$4,705	$6,919	$9,744
Median	$3,675	$4,585	$6,825	$9,750
Third Quartile[1]	$4,113	$5,470	$7,569	$12,500

Note:
[1] The third quartile is the 75th percentile or the upper quartile where 75 percent of the data lies below this point.
Source: StreetEasy (http://streeteasy.com) accessed in June 2025, Zillow.

THE FUTURE WITHOUT THE PROPOSED ACTIONS

In the future without the Proposed Actions (the No Action condition), it is anticipated that existing trends of increasing rents and household incomes in the study area will continue. Within the socioeconomic ½-mile study area, an estimated 263 dwelling units are anticipated to be completed by the 2029 analysis year. These dwelling units, most of which are located in planned high-density developments at 131 Concord Street (73 new dwelling units) and 36 Chapel Street (180 new dwelling units), will introduce population growth and contribute to furthering existing trends in the study area.

THE FUTURE WITH THE PROPOSED ACTIONS

By 2029, the Proposed Actions under the RWCDS are projected to result in 716 dwelling units, subject to the MIH program established for the Project Area. The MIH program sets four primary options that are characterized by different affordability levels to promote a range of affordable development.

- **Option 1**: 25 percent of residential floor area would be set aside for households with incomes averaging 60 percent of the area median income (AMI) or lower. Under the RWCDS this equates to 179 permanently affordable DUs.
- **Option 2**: 30 percent of residential floor area would be set aside for households with incomes averaging 80 percent AMI or lower. Under the RWCDS this equates to 215 permanently affordable DUs.
- **Option 3 (Deep Affordability Option)**: 20 percent of residential floor area would be set aside for households with incomes averaging 40 percent AMI or lower. Under the RWCDS this equates to 143 permanently affordable DUs.
- **Option 4 (Workforce Option):** 30 percent of residential floor area would be set aside for households with incomes averaging 115 percent AMI or lower. Under the RWCDS this equates to 215 permanently affordable DUs.

It is the Applicant's intent that of the 716 DUs constructed, 179 units would be developed in accordance with the MIH program under Option 1 (25 percent of residential floor area would be set aside for households with incomes averaging 60 percent AMI or lower). However, in accordance with *CEQR Technical Manual* guidance, to present a conservative assessment, MIH Option 3 is presented here.[5] New York City area AMIs and affordable monthly rents by AMI are

[5] For the purposes of this analysis, the most conservative MIH Option is the one which generates a population with the highest average income.

shown in **Tables C-6 and C-7**. AMIs are calculated yearly by the U.S. Department of Housing and Urban Development (HUD).

Table C-6
2025 New York City Area AMI

Family Size	30% of AMI	40% of AMI	50% of AMI	60% of AMI	80% of AMI	100% of AMI	120% of AMI	130% of AMI	165% of AMI
1	$34,020	$45,360	$56,700	$68,040	$90,720	$113,400	$136,080	$147,420	$187,110
2	$38,880	$51,840	$64,800	$77,760	$103,680	$129,600	$155,520	$168,480	$213,840
3	$43,740	$58,320	$72,900	$87,480	$116,640	$145,800	$174,960	$189,540	$240,570
4	$48,600	$64,800	$81,000	$97,200	$129,600	$162,000	$194,400	$210,600	$267,300
5	$52,500	$70,000	$87,500	$105,000	$140,000	$175,000	$210,000	$227,500	$288,750

Source: HUD

Table C-7
2025 New York City Affordable Monthly Rents by AMI

Unit Size	30% of AMI	40% of AMI	50% of AMI	60% of AMI	80% of AMI	100% of AMI	120% of AMI	130% of AMI	165% of AMI
Studio	$850	$1,134	$1,417	$1,701	$2,268	$2,835	$3,402	$3,685	$4,678
1 BR	$911	$1,215	$1,518	$1,822	$2,430	$3,037	$3,644	$3,948	$5,011
2 BR	$1,093	$1,458	$1,822	$2,187	$2,916	$3,645	$4,374	$4,738	$6,014
3 BR	$1,263	$1,685	$2,106	$2,527	$3,370	$4,212	$4,633	$5,476	$6,950

Note: Assumes tenant pays electricity. Rents are approximate and have been calculated at 30 percent of annual gross income of the target AMI.
Source: HUD

Average Household Income of the With Action Population

Table C-8 shows the estimated distribution of the 573 incremental market rate units in the With Action condition by number of bedrooms. Assuming the existing mix of unit types in the study area, approximately 14.4 percent would be studios, 26.8 percent would be one-bedroom units, 41.9 percent would be two-bedroom units, and 16.9 percent would be three-or-more-bedroom units.

Table C-8
Market Rate Units by Number of Bedrooms

RWCDS Market Rate Units	Percent	Number
Studio	14.5%	83
One Bedroom	26.7%	153
Two Bedroom	41.9%	240
Three bedrooms or larger	16.9%	97
Total	**100%**	**573**

Source: Distribution of units by number of bedrooms is sourced from the U.S. Census Bureau's 2019–2023 ACS 5-year estimate for the study area.

Table C-9 shows the calculations used to estimate the average household income of the market rate units. Using the third quartile of study area monthly rents by bedrooms, household incomes are estimated using the standard assumption that households spend 30 percent of their gross monthly income on rent. Then, the estimated annual incomes are multiplied by the number of

units to determine the aggregate income for all the units. Finally, this aggregate is divided by the total number of market rate units to determine that the average household income of the market rate units of $293,704.

Table C-9
Weighted Average Income of With Action Market Rate Renters

Number of Bedrooms	Monthly Rent	Estimated Gross Monthly Income[1]	Estimated Gross Yearly income	Units	Aggregate Income by Number of Bedrooms (Yearly Income x Units)
Studio	$4,113	$13,708	$164,500	83	$13,653,500
One Bedroom	$5,470	$18,233	$218,800	153	$33,476,400
Two Bedroom	$7,569	$25,230	$302,760	240	$72,662,400
Three bedrooms	$12,500	$41,667	$500,000	97	$48,500,000
Total				573	$168,292,300
Weighted Average Income of Market Rate Units (Aggregate Income ÷ Total Units)					**$293,704**

Note:
[1] Monthly income was estimated using the assumption that renters spend 30 percent of their gross monthly income on rent.
Numbers may not sum to totals due to rounding.
Sources: Monthly rent from recent and active StreetEasy Listings, June 2025; percent of units by number of bedrooms from the U.S. Census Bureau's 2019–2023 ACS 5-year estimate for the study area.

In the With Action condition under MIH Option 3, 143 of the 716 planned dwelling units would be affordable at 40 percent AMI (household incomes averaging $52,034).[6] **Table C-10** shows the average household income of both the affordable and market rate units. The average income of market rate units was multiplied by the total number of market rate units, and the average income of affordable units was multiplied by affordable units, to derive the aggregate income in market rate and affordable units, respectively. These two numbers were added together to determine the aggregate income for all units. This aggregate income was then divided by the total number of units to determine the average income of $245,437 for all units.

Table C-10
Weighted Average Income of Total With Action Population

	Income	Units	Aggregate Income (Income x Units)
Market rate	$293,704	573	$168,292,300
Affordable MIH[1]	$52,034	143	$7,440,919
Total		716	$175,733,219
Weighted Average Income of the With Action Population (Aggregate Income ÷ Total Units)			**$245,437**

Note:
[1] Affordable income is based on the expected income at 40 percent AMI for a household size of 2.02 (the average household size throughout Brooklyn CD 2).
Numbers may not sum to totals due to rounding.
Sources: HUD

[6] Because AMI is defined by household size and the average household size for Brooklyn CD 2 falls between two whole numbers (2.02 persons per household), the appropriate CEQR methodology was used to estimate affordable unit income levels.

In the With Action condition, the average household income of the new population ($245,437) would fall below the average household income of the existing population in the study area ($292,339). Therefore, in accordance with *CEQR Technical Manual* guidelines, Step 3 of the preliminary indirect residential displacement assessment is not warranted.

Based on this preliminary assessment, the incremental population generated by the Proposed Actions' RWCDS would not have the potential to introduce or accelerate a trend of changing socioeconomic conditions that could result in the displacement of a vulnerable population and therefore would not result in significant adverse impacts due to indirect residential displacement.

Attachment D: Community Facilities and Services

A. INTRODUCTION

This attachment assesses the potential for impacts of the Proposed Actions on community facilities and services. The 2025 *City Environmental Quality Review (CEQR) Technical Manual* defines community facilities as public or publicly funded schools, child care centers, libraries, health care facilities, and fire and police protection services. CEQR methodology assesses direct effects on community facilities, such as when a facility is physically displaced or altered, and indirect effects, which could result from increased demand for community facilities and services generated by new users such as the new population that would result from the Proposed Actions.

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project") at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2") (together, the "Project Area"). As described in Attachment A, "Project Description," a Reasonable Worst-Case Development Scenario (RWCDS) was developed that includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

This analysis considers the RWCDS development of 716 total dwelling units, of which approximately 144 to 179 would be permanently affordable units; in accordance with City guidelines for the publicly funded child care programs analysis presented below, 144 affordable units are assessed. Based on the guidelines presented in the *CEQR Technical Manual*, the Proposed Actions require an analysis of publicly funded child care, which is presented below.

PRINCIPAL CONCLUSIONS

DIRECT EFFECTS

According to the *CEQR Technical Manual*, if a project would physically alter a community facility, whether by displacement of the facility or other physical change, this "direct" effect triggers the need to assess the service delivery of the facility and the potential effect that the physical change may have on that service delivery. The Proposed Actions would not directly affect any community facilities as there are no existing or planned community facilities on the Development Site; therefore, the Proposed Development would not result in significant adverse direct impacts to community facilities and services.

INDIRECT EFFECTS

The future with the Proposed Actions (the "With Action" condition) would result in a net increase in residential population compared with the future without the Proposed Actions (the "No Action" condition), but would not have a significant adverse impact on schools, libraries, health care facilities, or police and fire services. For publicly funded child care services, facilities in the study area would continue to operate under capacity and the Proposed Actions would not result in a significant adverse impact on child care facilities.

B. METHODOLOGY

This analysis of community facilities has been conducted in accordance with *CEQR Technical Manual* methodologies and the latest data and guidance from the New York City Department of City Planning (DCP).

PRELIMINARY SCREENING

The purpose of the preliminary screening is to determine whether a community facilities assessment is warranted. As recommended by the *CEQR Technical Manual*, a community facilities assessment is warranted if a project has the potential to result in either direct or indirect effects on community facilities. If a project would physically alter a community facility, whether by displacement of the facility or other physical change, this "direct" effect triggers the need to assess the service delivery of the facility and the potential effect that the physical change may have on that service delivery. In addition, new population added to an area as a result of a project would use existing services, which may result in potential "indirect" effects on service delivery. Depending on the size, income characteristics, and age distribution of the new population, there may be potential effects on public schools, libraries, or child care centers.

DIRECT EFFECTS

The Proposed Actions would not displace or otherwise directly affect any community facilities, including public schools, child care centers, libraries, or police and fire protection services. Therefore, an analysis of direct effects is not warranted.

INDIRECT EFFECTS

The *CEQR Technical Manual* provides thresholds for guidance in making an initial determination of whether a detailed analysis is necessary to determine the potential for impacts due to indirect effects on community facilities. **Table D-1** lists those *CEQR Technical Manual* analysis thresholds for each community facility type. If a project exceeds the threshold for a specific facility type, a more detailed analysis is warranted.

A preliminary screening analysis was conducted to determine if the Proposed Actions would result in the exceedance of any of the *CEQR Technical Manual* thresholds.

Table D-1
Preliminary Screening Analysis Criteria

Community Facility	Threshold For Detailed Analysis
Public schools	More than 100 elementary/intermediate school or 150 high school students
Libraries	Greater than 5 percent increase in ratio of DUs to libraries in borough
Health care facilities (outpatient)	Introduction of sizeable new neighborhood where none existed before[1]
Child care centers (publicly funded)	More than 20 eligible children based on number of low- and low/moderate-income DUs by borough (110 affordable units in Brooklyn)
Fire protection	Introduction of sizeable new neighborhood where none existed before[1]
Police protection	Introduction of sizeable new neighborhood where none existed before[1]

Notes:
DU = dwelling unit
[1] The *CEQR Technical Manual* cites the Hunter's Point South project in Long Island City, Queens, as an example of a project that would introduce a sizeable new neighborhood where none existed before. That project was expected to introduce approximately 6,650 new DUs to the Hunter's Point South waterfront.
Source: *CEQR Technical Manual*

Although 179 affordable units are projected, the Proposed Actions would result in 144 incremental affordable units to households at or below 80 percent of AMI for the purposes of publicly funded child care programs (20% affordable). The number of incremental affordable housing units at or below 80 percent of AMI warrants an analysis of publicly funded child care programs, based on the screening criteria in **Table D-1**, which includes a threshold of 110 affordable units in Brooklyn at or below 80 percent of AMI. Based on the screening criteria in **Table D-1**, the Proposed Actions would not have a significant adverse impact on schools, libraries, health care facilities, or police and fire services; therefore, detailed analyses of indirect effects on schools, libraries, health care facilities, and police and fire services are not warranted.

Public Schools

The *CEQR Technical Manual* recommends conducting a detailed analysis of public schools if a proposed action would generate more than 100 elementary/intermediate school students and/or more than 150 high school students. The 716 incremental dwelling units resulting from the Proposed Actions would not generate enough students to surpass these thresholds, based on the New York City School Construction Authority's (SCA's) 2024 Housing Multipliers for Brooklyn Community School District (CSD) 13 for elementary, intermediate, or high schools.[1] Therefore, a detailed analysis of the Proposed Actions' potential effect on elementary/intermediate/high schools is not warranted.

Libraries

Potential impacts on libraries can result from an increased user population. According to the *CEQR Technical Manual*, a proposed action that results in a 5 percent increase in the average number of dwelling units served per branch—which is 834 dwelling units per branch in Brooklyn—may cause the potential for a significant impact on library services and require further analysis. The Proposed Actions would result in 716 incremental dwelling units. Therefore, the Proposed Actions would not exceed the 834 dwelling unit threshold, and a detailed analysis of the Proposed Actions' potential effect on libraries is not warranted.

[1] Based on 716 total dwelling units, the Proposed Actions would introduce approximately 36 elementary school students, 8 middle school students, and 15 high school students.

Child Care Centers

According to the *CEQR Technical Manual*, if a proposed project would add more than 20 children eligible for publicly funded child care to the study area's child care facilities, a detailed analysis of its potential for impact on publicly funded child care facilities is warranted. This threshold is based on the number of low-income and low/moderate-income dwelling units introduced by a proposed project. Low-income and low/moderate-income affordability levels are intended to approximate the financial eligibility criteria for publicly funded child care facilities established by the New York City Department of Education's (DOE's) Division of Early Childhood Education, which generally corresponds to 200 percent of the Federal Poverty Level or 80 percent of AMI. In Brooklyn, projects introducing 110 or more low- to moderate-income dwelling units would meet the threshold for analysis of introducing 20 or more children eligible for child care services. As discussed above, the Proposed Actions would result in 144 affordable units for households earning up to 80 percent AMI for the purposes of publicly funded child care. The number of incremental affordable units generated by the Proposed Actions exceeds *CEQR Technical Manual* thresholds for analysis of publicly funded child care; therefore, an assessment was conducted to determine whether the Proposed Actions would result in any potential for significant adverse impacts to community facilities and services.

Health Care Facilities

Health care facilities include public, proprietary, and nonprofit facilities that accept government funds (usually in the form of Medicare and Medicaid reimbursements) and that are available to any member of the community. Examples of these types of facilities include hospitals, nursing homes, clinics, and other facilities providing outpatient health services.

According to the *CEQR Technical Manual*, if a proposed project would create a sizeable new neighborhood where none existed before, there may be increased demand on local public health care facilities, which may warrant further analysis of the potential for indirect impacts on outpatient health care facilities. The Project Area is located in the DUMBO neighborhood, which is an established neighborhood with a long-term trend toward increased residential development. The Proposed Actions would not result in the creation of a sizeable new neighborhood where none existed before and thus a detailed analysis of indirect effects on health care facilities is not warranted.

Police And Fire Services

The *CEQR Technical Manual* recommends detailed analyses of impacts on police and fire service in cases where a proposed action has the potential to affect the physical operations of, or direct access to and from, a precinct house or fire station, or where a proposed action would create a sizeable new neighborhood where none existed before. The Proposed Actions would not result in these direct effects on either police or fire services as it does not affect the physical operations of a precinct house or fire station, nor would it create a sizeable new neighborhood where none existed before. Therefore, no further analysis of the potential for impacts on police and fire service is warranted.

POTENTIAL INDIRECT EFFECTS ON PUBLICLY FUNDED CHILD CARE CENTERS

Consistent with the methodologies of the *CEQR Technical Manual*, this analysis of potential impacts to publicly financed early childhood programs focuses on services for eligible children aged 5 through 12 who are expected to be in school for most of the day. Publicly financed early childhood programs are under the auspices of DOE's Early Childhood Education Services

division. Publicly financed early childhood programs comprise EarlyLearn NYC (Child Care and Head Start programs), 3-K, and Pre-K for All. While 3-K and Pre-K programs are free for all three- and four-year-old children in New York City, there are eligibility requirements for children to enroll in EarlyLearn Child Care and Head Start programs. Publicly financed early childhood programs are available for eligible children 5 and younger (until the child is eligible to attend Kindergarten for a fall start date). According to the *CEQR Technical Manual*, an analysis of potential impacts to early childhood programs should be limited to EarlyLearn.

In order to receive subsidized seats, families must meet specific financial and social eligibility criteria as established by DOE. In general, children in families that have incomes at or below 200 percent of the Federal Poverty Level (FPL), depending on family size, are financially eligible for subsidized seats, although in some cases eligibility can go up to 275 percent of the FPL. To receive subsidized child care services, a family must also have an approved "reason for care," such as involvement in a child welfare case or participation in a "welfare-to-work" program. Eligibility for Head Start, a federally funded child care program that provides children with half-day or full-day early childhood education, is limited to families with incomes at 130 percent or less of the FPL.

As described in the *CEQR Technical Manual*, the City's affordable housing market is pegged to the AMI rather than FPL. Lower-income dwelling units must be affordable to households at or below 80 percent AMI. Since family incomes at or below 200 percent of the FPL fall under 80 percent AMI, for the purposes of CEQR analysis, the number of dwelling units expected to be subsidized and targeted for incomes of 80 percent AMI or below provides a conservative estimate of the number of dwelling units with children that are eligible for publicly financed early childhood programs.

Most children are served through enrollment in contracted EarlyLearn programs or by vouchers for private and non-profit organizations that operate early childhood care programs throughout the city. Registered or licensed providers can offer family-based early childhood care in their homes. Informal early childhood care can be provided by a relative or neighbor for no more than two children. Children aged 6 weeks through 13 years old can be cared for either in group early childhood care centers licensed by the New York City Department of Health and Mental Hygiene (DOHMH) or in homes of registered early childhood care providers. Space for one child in such child care centers is termed a "slot." Vouchers are also issued to eligible families, which may be used by parents to pay for early childhood care from any legal early childhood care provider in the City.

Since there are no locational requirements for enrollment in early childhood programs, and some parents or guardians choose an early childhood care center close to their employment rather than their residence, the service areas of these facilities can be quite large and are not subject to strict delineation to identify a study area. However, according to CEQR methodology for early childhood program analyses, the locations of publicly financed early childhood programs within approximately 1.5 miles of a project site should be shown, reflecting the fact that the programs closest to a project site are more likely to be subject to increased demand from new residents introduced by an action. Therefore, the study area for the analysis of publicly financed early childhood programs is the area within 1.5 miles of the Project Area, as shown on **Figure D-1**. Current enrollment data for the publicly financed early childhood programs closest to the Project Area were gathered from DOE's Division of Early Childhood Education.

Child care enrollment in the No Action condition was estimated by multiplying the number of new low- and low/moderate-income (i.e., affordable, non-senior) housing units expected in the 1.5-

1.9.26



Project Area

Study Area (1.5-mile perimeter)

1 Community Facility

0 2,500 FEET

Community Facilities

COLUMBIA HEIGHTS REZONING

Figure D-1

mile study area by the CEQR multipliers for estimating the number of children under age six eligible for publicly funded child care services. For Brooklyn, the multiplier estimates 0.178 public child care-eligible children under age six per low- and low/moderate-income housing unit. For Manhattan, the multiplier is 0.115. As noted above, the CEQR analysis focuses on services for children under age 6 because eligible children aged 6 to 12 are expected to be in school for most of the day.

The child care-eligible population introduced by the Proposed Actions was also estimated using the *CEQR Technical Manual* child care multipliers. The population of public child care-eligible children under age six was then added to the child care enrollment calculated in the No Action condition. According to the *CEQR Technical Manual*, the potential for a significant adverse impact on publicly funded child care may result if an action would result in a demand for slots greater than the remaining capacity of child care facilities (i.e., more than 100 percent utilization), and if that demand constitutes an increase of five percentage points or more of the collective capacity of the child care facilities serving the respective study area.

C. EXISTING CONDITIONS

There are 86 publicly funded child care facilities within the 1.5-mile study area (see **Figure D-1**). As shown in **Table D-2**, these child care centers have a total capacity of 3,578 slots and an enrollment of 2,104 children, with 1,474 available slots (58.80 percent utilization).

D. THE FUTURE WITHOUT THE PROPOSED ACTIONS

Planned development projects in the 1.5-mile study area will introduce approximately 822 new affordable housing units (a total of 147 children) by 2029, the Proposed Actions' build year.

Based on these projections, the number of available slots will decrease in the No Action condition. As shown in **Table D-2**, there are 1,474 available slots and a utilization of 58.80 percent under existing conditions. When the estimated 147 children under age six introduced by the planned development projects are added to this total, child care facilities in the study area will operate with a surplus of 1,327 slots (62.91 percent utilization).

Table D-2
Publicly Funded Child Care Facilities Serving the Study Area

Map No.*	Contractor Name	Address	Enrollment	Capacity	Available Slots	Utilization Rate**
1	Transfiguration School	10 Confucius Plaza	8	11	3	70.00%
2	**GSS 60 Essex Child and Family Center**	**60 Essex Street**	**17**	**30**	**13**	**56.67%**
3	**Hamilton-Madison House, Inc.**	**253 South Street**	**12**	**48**	**36**	**25.00%**
4	**Chinatown Day Care Center**	**35 Division Street**	**42**	**49**	**7**	**85.71%**
5	**Dewitt Reformed Church**	**280 Rivington Street**	**18**	**50**	**32**	**36.00%**
6	**Escuela Hispana Montessori Inc.**	**180 Suffolk Street**	**20**	**132**	**112**	**15.15%**
7	**GSS 294 Delancey Child and Family Center**	**294 Delancey Street**	**19**	**50**	**31**	**38.00%**
8	Manny Cantor Center	197 East Broadway	36	51	15	70.00%
9	**Early Childhood Center**	**184 Eldridge Street**	**32**	**114**	**82**	**28.07%**
10	**GSS 300 Delancey Child and Family Center**	**300 Delancey Street**	**4**	**46**	**42**	**8.70%**
11	**CPC Garment Industry Early Childhood Center**	**115 Chrystie Street, Third Floor**	**10**	**43**	**33**	**23.26%**
12	**77 Market Street**	**77 Market Street**	**13**	**31**	**18**	**41.94%**
13	**Henry Street Early Childhood Center**	**301 Henry Street, Bellevue Hospital Center**	**30**	**70**	**40**	**42.86%**

Table D-2
Publicly Funded Child Care Facilities Serving the Study Area

Map No.*	Contractor Name	Address	Enrollment	Capacity	Available Slots	Utilization Rate**
14	**Victoria Children's Center, Inc**	**323 Grand Street**	**27**	**45**	**18**	**60.00%**
15	**CPC Little Star of Broome Street Early Childhood Center**	**175 Delancey Street**	**22**	**39**	**17**	**56.41%**
16	**All My Children Day Care and Nursery School**	**110 Ridge Street**	**18**	**56**	**38**	**32.14%**
17	Elements Preschool	99 Suffolk Street	3	4	1	70.00%
18	Bright Horizons at Essex Crossing	151 Clinton Street	7	10	3	70.00%
19	Francisca Heredia	110 Forsyth Street	3	4	1	70.00%
20	Luz M. Serrano	250 Clinton Street	5	7	2	70.00%
21	Miriam Rodriguez	143 Essex Street	2	3	1	70.00%
22	District 2 Pre-K Center	2-26 Washington Street	297	424	127	70.00%
23	P.S. 020 Anna Silver	166 Essex Street	28	40	12	70.00%
24	P.S. 110 Florence Nightingale	285 Delancy Street	14	20	6	70.00%
25	P.S. 134 Henrietta Szold	293 East Broadway	16	23	7	70.00%
26	P.S. 140 Nathan Straus	123 Ridge Street	13	19	6	70.00%
27	P.S. 184M Shuang Wen	327 Cherry Street	36	51	15	70.00%
28	P.S. 188 The Island School	442 East Houston Street	23	33	10	70.00%
29	P.S. 002 Meyer London	122 Henry Street	17	24	7	70.00%
30	P.S. 042 Benjamin Altman	71 Hester Street	22	31	9	70.00%
31	Childcare Partners at New York West	28 Washington Street	35	50	15	70.00%
32	Bright Horizons	20 Pine Street	16	23	7	70.00%
33	The Peck Slip School	1 Peck Slip	36	51	15	70.00%
34	Borough of Manhattan Community College Early Childhood Center	199 Chambers Street	15	21	6	70.00%
35	5 Point Family, LLC. dba Kiddie Academy of Tribeca	72 Reade Street	15	21	6	70.00%
36	P.S. 124 Yung Wing	40 Division Street	39	56	17	70.00%
37	Chinese Community Concerns Corp.	180 Mott Street	6	9	3	70.00%
38	**CPC Chung Pak Early Childhood Center**	**125 Walker Street**	**25**	**35**	**10**	**71.43%**
39	**Victoria Children's Group Inc.**	**230 Grand Street, Second Floor**	**3**	**31**	**28**	**9.68%**
40	**CPC Tribeca Early Childhood Center**	**21 St. Johns Lane, Second Floor**	**5**	**34**	**29**	**14.71%**
41	PNW Enterprises, LLC dba NY Kids Club; Tribeca Nypreschool RFP	88 Leonard Street	13	19	6	70.00%
42	Bright Horizons at Tribeca	129 Hudson Street	13	19	6	70.00%
43	Tribeca KinderCare	311 Greenwich Street	7	10	3	70.00%
44	Bao Na Li	358 Broome Street	10	14	4	70.00%
45	P.S. 130 Hernando De Soto	143 Baxter Street	16	23	7	70.00%
46	Spruce Street School	12 Spruce Street	18	26	8	70.00%
47	KinderCare FiDi NYC	101 John Street	7	10	3	70.00%
48	Yan Zhu Liao	40 Madison Street	2	3	1	70.00%
49	P.S. 001 Alfred E. Smith	8 Henry Street	21	30	9	70.00%
50	P.S. 126 Jacob August Riis	80 Catherine Street	12	17	5	70.00%
51	P.S. 150	28-42 Trinity Place	18	26	8	70.00%
52	Imagine Early Learning Center @ FED Kids	26 Federal Plaza	7	10	3	70.00%
53	Battery Park City Day Nursery	215 South End Avenue	28	40	12	70.00%
54	Battery Park City School	55 Battery Place	18	26	8	70.00%
55	P.S. 89	201 Warren Street	30	43	13	70.00%
56	BCS Laurie A. Cumbo Children's Enrichment Center	180 Myrtle Avenue	22	31	9	70.00%
57	Brooklyn Children and Family Services	25 Chapel Street	6	9	3	70.00%
58	A. Fantis School	195 State Street	33	47	14	70.00%
59	**Warren Street Center for Children and Families**	**343 Warren Street**	**8**	**78**	**70**	**10.26%**

Table D-2
Publicly Funded Child Care Facilities Serving the Study Area

Map No.*	Contractor Name	Address	Enrollment	Capacity	Available Slots	Utilization Rate**
60	Our Children's Center-City Tech	55 Johnson Street	11	16	5	70.00%
61	Imagine Early Learning Centers @ Dumbo	85 Adams Street	7	10	3	70.00%
62	Imagine Early Learning Center @ Brooklyn Heights	50 Monroe Place	20	29	9	70.00%
63	NY Kids Club & NY Preschool	182-184 Henry Street	15	21	6	70.00%
64	Kiddie Korner Daycare & Preschool	117 Remsen Street	15	21	6	70.00%
65	Cobble Hill KinderCare	112 Atlantic Avenue	20	29	9	70.00%
66	Bright Horizons at Dumbo	60 Water Street	12	17	5	70.00%
67	Imagine Early Learning Center @ Brooklyn Bridge Development Center	101 Willoughby Street	9	13	4	70.00%
68	District 13 Pre-K Center	25 Dock Street	40	57	17	70.00%
69	P.S. 307 Daniel Hale Williams	209 York Street	28	40	12	70.00%
70	The Brooklyn New School, P.S. 146	610 Henry Street	54	77	23	70.00%
71	Compass Charter School	300 Adelphi Street	35	50	15	70.00%
72	Oliva Gaspar Group Day Care	60 Carlton Avenue	2	3	1	70.00%
73	P.S. 020 Clinton Hill	225 Adelphi Street	54	77	23	70.00%
74	P.S. 046 Edward C. Blum	100 Clermont Avenue	27	39	12	70.00%
75	P.S. 067 Charles A. Dorsey	51 Saint Edwards Street	12	17	5	70.00%
76	P.S. 142 Amalia Castro	100 Attorney Street	36	51	15	70.00%
77	Academy of Arts and Letters	344 Monroe Street	37	53	16	70.00%
78	**Strong Place for Hope Day Care (Atlantic Avenue Site)**	**460 Atlantic Avenue**	**26**	**93**	**67**	**27.96%**
79	Hanson Place Child Development Center Inc.	55 Hanson Place	6	9	3	70.00%
80	P.S. 287 Bailey K. Ashford	50 Navy Street	15	21	6	70.00%
81	P.S. 261 Zipporiah Mills	314 Pacific Street	36	51	15	70.00%
82	P.S. 038 The Pacific	450 Pacific Street	93	133	40	70.00%
83	P.S. 029 John M. Harrigan	425 Henry Street	36	51	15	70.00%
84	P.S. 032 Samuel Mills Sprole	317 Hoyt Street	64	91	27	70.00%
85	P.S. 058 The Carroll	330 Smith Street	54	77	23	70.00%
86	Y.M. & Y.W.H.A. of Williamsburg, Inc.	64 Division Avenue	42	60	18	70.00%
Total			**2,104**	**3,578**	**1,474**	**58.80%**

Notes:
***** See **Figure D-1**.
** Where capacity data was not provided (projects not in **Bold**), the average percentage of available capacity within the study area (approximately 70 percent) was used so that enrollment was assumed to equal 70 percent of capacity.
Source: DOE, December 2024

E. THE FUTURE WITH THE PROPOSED ACTIONS

As discussed above, the Proposed Actions would result in 144 units affordable to households at or below 80 percent of AMI for the purposes of publicly funded child care.

Based on the *CEQR Technical Manual* child care multipliers, this development would result in approximately 26 children under the age of six who would be eligible for publicly funded child care programs. With the addition of these children, enrollment at child care facilities in the study area would increase to 2,277 children, compared to a capacity of 3,578 slots, with a surplus of 1,301 slots (see **Table D-3**). Child care facilities would operate at 63.63 percent utilization, which represents an increase in the utilization rate of 0.72 percentage points over the No Action condition.

Table D-3
Estimated Child Care Facility Enrollment, Capacity, and Utilization

	Enrollment	Capacity	Available Slots	Utilization Rate	Change in Utilization
No Action Condition	2,251	3,578	1,327	62.91%	N/A
With Action Condition	2,277	3,578	1,301	63.63%	0.72%
Increment	+26	--	-26	+0.72%	--

Notes:
N/A – Not applicable
Sources: DOE, December 2024; AKRF, Inc.

As noted above, the *CEQR Technical Manual* guidelines indicate that the potential for a significant adverse impact to publicly funded child care services could result when both of the following criteria are met: (1) a demand for slots greater than the remaining capacity of child care facilities; and (2) an increase in demand of 5 percentage points of the study area capacity. In the With Action condition, child care facilities in the study area would continue to operate under capacity (63.63 percent utilization) and the utilization rate would increase by less than 5 percentage points (0.72 percentage points). Accordingly, under the *CEQR Technical Manual* criteria, the Proposed Actions would not result in a significant adverse impact on child care facilities.[1] ✷

[1] Conservatively estimating child care enrollment based on 179 affordable units, the incremental enrollment would be 32 slots (resulting in 1,295 available slots), which would not result in a significant adverse impact on child care facilities.

Attachment E: Open Space

A. INTRODUCTION

This attachment assesses the potential impacts of the Proposed Actions on open space resources. Open space is defined in the 2025 *City Environmental Quality Review (CEQR) Technical Manual* as publicly accessible, publicly or privately owned land that is available for leisure, play, or sport, or serves to protect and enhance the natural environment. An open space assessment may be necessary if a project would have a direct effect, such as eliminating or altering a publicly accessible open space, or an indirect effect, such as when an increase in population could overtax the capacity of an area's open spaces. Direct effects could also include a proposed action's effects on open spaces due to increased noise, air pollutant emissions, odor, or shadows.

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project") at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2") (together, the "Project Area"). As described in Attachment A, "Project Description," a Reasonable Worst-Case Development Scenario (RWCDS) was developed that includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

PRINCIPAL CONCLUSIONS

The Proposed Actions would result in the introduction of housing that would increase the residential population that utilizes the area's open spaces. Therefore, in accordance with *CEQR Technical Manual* guidelines, an open space assessment was conducted to determine whether the Proposed Actions would result in significant adverse open space impacts. This assessment concludes that the Proposed Actions would not result in significant adverse open space impacts.

DIRECT EFFECTS

The Proposed Actions would not result in any direct effects related to encroachments on or loss of open space, changes in open space such that it no longer serves the same user population, or impacts due to noise or odor emission that may affect its usability.

INDIRECT EFFECTS

With the Proposed Actions, the total open space ratio in the residential study area would decrease by approximately 4.9 percent (to 3.736acres per 1,000 residents). Given the high open space ratio

and the reduction below 5 percent, the Proposed Actions would not result in a significant adverse impact to open space in the residential study area.

B. METHODOLOGY

As defined by the *CEQR Technical Manual*, open space is accessible to the public on a constant and regular basis, including for designated daily periods. Public open space may be under government or private jurisdiction and typically includes City, State, and Federal parkland, esplanades, and plazas designated through regulatory approvals such as zoning. Private open space is not publicly accessible or is available only to limited users. It is not available to the public on a regular or constant basis. Examples of private open space are natural areas with no public access, front and rear yards, rooftop recreational facilities, and stoops or landscaped grounds used by community facilities, such as public and private educational institutions, where the open space is accessible only to the institution-related population.

Open spaces can be characterized as either active or passive depending on the activities the space allows. In many cases, open space may be used for both active and passive recreation. Open space that is used for sports, exercise, or active play is classified as "active open space," and consists primarily of recreational facilities. Passive open spaces are used for relaxation, such as sitting or strolling.

DIRECT EFFECTS

According to the *CEQR Technical Manual*, a proposed action would directly affect open space conditions if any of the following occurs: it causes the loss of public open space; it changes the use of an open space so that it no longer serves the same user population; it limits public access to an open space; or it results in increased noise or air pollutant emissions, odor, or shadows that would temporarily or permanently affect the usefulness of a public open space. As discussed elsewhere in the EAS, the Proposed Actions would not displace any open space, cause a change in open space use, or result in substantial new shadows or increased noise or air emissions on an open space. As a result, a direct effects analysis is not warranted.

INDIRECT EFFECTS

As described in the *CEQR Technical Manual*, open space can be indirectly affected by a proposed action if a project would add enough population, either residential or non-residential, to noticeably diminish the capacity of open space in the area to serve the future population. The preliminary screening threshold to determine if an assessment of indirect effects is warranted is if a project would introduce more than 250 units (in an existing R5 or above, C, or M district) or 500 nonresidents (or workers). The Proposed Actions would not introduce more than 500 workers, but would introduce more than 250 units; therefore, a preliminary assessment of indirect effects on open space is warranted. This consists of calculating total population, tallying the open space acreage within the area, and comparing the open space ratios for the future without the Proposed Actions (the "No Action" condition) and the future with the Proposed Actions (the "With Action" condition).

NYC PARKS WALK TO A PARK INITIATIVE

New York City, as part of OneNYC 2050, has put forth a goal that calls for 85 percent of New York City residents to live within walking distance of a park by 2030. To help the City reach this goal, the New York City Department of Parks and Recreation (NYC Parks) created the Walk to a

Park initiative that focuses on increasing access to parks and open space in areas of the City where residents live further than a walk to a park.

According to the *CEQR Technical Manual*, as part of the preliminary assessment for open space, a project should be reviewed to determine if it is located in an area of the City within a Walk to a Park Service Area. If a project site is located outside of a Walk to a Park Service Area (i.e., located in known walk gap areas), that suggests the need for a detailed analysis to determine if the project may further exacerbate a condition of residents living in areas of the City with inadequate park access, potentially leading to a significant impact.

The Development Site is located within a Walk to a Park Service Area (see **Figure E-1**), and therefore a detailed analysis of indirect effects is not required.

ANALYSIS FRAMEWORK

STUDY AREA

The *CEQR Technical Manual* recommends establishing a study area as the first step in an open space assessment. The study area is based on the distance that the respective users—in this case residents—are likely to walk to an open space. According to the *CEQR Technical Manual*, residents are assumed to walk approximately ½-mile, to an open space.

Because the Proposed Development would introduce a new residential population above the 250-unit threshold, the adequacy of open space resources was assessed for the ½-mile (residential) study area. This study area was adjusted to include all census tracts with at least 50 percent of their area within the ½-mile boundary. In this way, the study area allows for analysis of both the open spaces in the area and population data. The population of the open space study area was compiled from the 2020 U.S. Census Bureau Decennial Census.

As shown on **Figure E-2**, the ½-mile residential study area includes the area within Census Tracts 1, 13, 21, 3.01, 5.01, and 5.02.[1] The residential study area is generally bounded by the East River to the north and west, Little Street to the east, and Joralemon Street to the south.

Publicly accessible open spaces and recreational facilities were inventoried to determine their size, character, utilization, amenities, and condition. Open spaces that are not accessible to the general public or that do not offer usable recreational areas, such as spaces where seating is unavailable, were generally excluded from the survey. In accordance with the *CEQR Technical Manual*, publicly accessible open space is defined as a facility open to the public at designated hours on a regular basis and is assessed for impacts using both a quantitative and qualitative analysis, whereas private open space is not accessible to the general public on a regular basis and is considered qualitatively. Field surveys conducted in July 2025 and secondary sources, such as the NYC Parks, were used to determine the number, size, availability, and condition of publicly accessible open space resources in the residential study area.

With an inventory of available open space resources and potential users, the adequacy of open space in the study area can be assessed both quantitatively and qualitatively. The quantitative

[1] A small portion of Brooklyn Bridge Park - an open space resource that falls within the ½-mile study area Census Tracts – is located outside of the study area tracts. However, the entirety of the park's acreage, including this approximately nine-acre portion, is considered as part of the quantitative assessment since this additional park acreage is continuous.



Walk to a Park Service Area

COLUMBIA HEIGHTS REZONING

Figure E-1



Open Space Study Area

COLUMBIA HEIGHTS REZONING

Figure E-2

approach calculates the ratio of open space acreage to the population in the study area (i.e., acres of open space per 1,000 residents) and compares this ratio with certain guidelines. The qualitative assessment examines other factors that may affect conclusions about adequacy, including proximity to additional resources beyond the study area, the availability of private recreational facilities, and the demographic characteristics of the area's population. Specifically, the analysis in this attachment includes the following:

- The population of the open space study area, compiled from 2020 U.S. Census data and supplemented by data from the New York City Department of City Planning's (DCP's) Housing Database;
- An inventory of all publicly accessible recreational facilities in the residential open space study area;
- An assessment of the quantitative ratio of open space in the study area, calculated by computing the ratio of open space acreage to the residential population in the study area and comparing this open space ratio with certain guidelines. In New York City, local open space ratios vary widely, and the median ratio at the citywide community district level is 1.5 acres of open space per 1,000 residents. Typically, for the assessment of both direct and indirect effects, citywide guidelines have been calculated for comparison and analysis. As a planning goal, a ratio of 2.5 acres per 1,000 residents represents an area well-served by open spaces, and is consequently used as an optimal benchmark for residential populations. This goal is often not feasible for many areas of the City and does not constitute an impact threshold. Rather, it is a benchmark that represents how well an area is served by open space;
- An evaluation of qualitative factors affecting open space use;
- A determination of the adequacy of open space in the residential open space study area under existing conditions, the No Action condition, and the With Action condition; and
- An assessment of expected changes in future levels of open space supply and demand in the 2029 analysis year, based on other planned development projects within the open space study area. To estimate the population expected in the study area in the No Action condition, an average household size of 2.03 persons is applied to the number of new dwelling units expected in the study area. Any new open space or recreational facilities that are anticipated to be operational by the analysis year are also accounted for. Open space ratios are calculated for No Action and With Action conditions and compared to determine changes in future levels of adequacy.

PRELIMINARY ASSESSMENT

A preliminary assessment considers the total population relative to the total acreage of available open space in a given study area to determine an open space ratio for the existing, No Action, and With Action conditions. Impact determinations are based in part on how a project would change the open space ratios in the study area as well as other qualitative considerations. According to Table 7-1 of the *CEQR Technical Manual*, a decrease in the open space ratio of five percent or more compared to the No Action condition is generally considered to have the potential for a significant adverse impact for projects in study areas where the open space ratio is 2.01 to 2.50 acres or greater per 1,000 residents or less, and may warrant further analysis. In addition to the quantitative factors cited above, the *CEQR Technical Manual* also recommends consideration of qualitative factors in assessing the potential for open space impacts. These include the availability of nearby destination resources, the beneficial effects of new open space resources

provided by a project, and the comparison of projected open space ratios with established City guidelines.

C. EXISTING CONDITIONS

STUDY AREA POPULATION

As shown on **Figure E-2** and summarized in **Table E-1**, the study area for the Proposed Actions includes six census tracts with a total population of 27,772 residents, based on 2020 Decennial Census data and the New York City Department of City Planning (DCP) Housing Database[2].

Table E-1
Study Area Population

Census Tract	Population
1[1]	4,616
13	2,465
21	5,975
3.01	3,850
5.01	4,404
5.02	2,640
Census Tracts Total Population	**23,950**
DCP Housing Database Additional Residents [2]	**3,822**

Notes:
[1] See **Figure E-2** for census tract locations.
[2] DCP's Housing Database shows a net increase of 2,019 housing units in the study area since the Census data collection in April 2020, according to DCP Housing Database 2025 Q2 (the latest available data). Assuming a 93.2 percent occupancy rate and an average household size of 2.02 within Brooklyn CD 2, an additional 3,822 people are estimated over the 23,950 residents identified in the 2020 Census for an existing population estimate of 27,772 residents.
Source: 2020 U.S. Census Bureau Decennial Census

STUDY AREA OPEN SPACE RESOURCES

Within the residential ½-mile study area, there are 17 publicly accessible open space resources, as shown on **Figure E-2** and summarized in **Table E-2**, below. These resources contain approximately 111.17 acres of open space. Most resources are operated by NYC Parks, with two plazas and a promenade operated by the New York City Department of Transportation (NYCDOT) and two privately owned public spaces (POPS).

In addition to the resources included in the quantitative assessment, and consistent with *CEQR Technical Manual* guidance, there are several open space resources that have not been included. These resources, discussed further below, are expected to provide additional open space amenities to study area residents.

[2] The DCP Housing Database was consulted to assess potential population growth since the data collection in April 2020. Approximately 2,019 housing units have been constructed within the study area since the 2020 Census (with an average 93.2 percent occupancy rate), increasing the population by an estimated 3,822 residents from the 23,950 residents identified within the census tracts.

ADEQUACY OF OPEN SPACES

Quantitative Assessment

The study area has an existing open space ratio of 4.003 acres per 1,000 residents (see **Table E-3**, below). This far exceeds the City's planning guideline of 2.5 acres per 1,000 residents.

Table E-2
Existing Publicly Accessible Open Space Resource Inventory

Map ID*	Name	Owner or Agency	Features	Total Acres of Open Space	Condition/ Utilization
1	Cadman Plaza Park	NYC Parks	Trees, plantings, benches, statues, turf field, drinking fountains, restrooms, trash receptacles	10.38	Good/High
2	McLaughlin Park	NYC Parks	Baseball fields, handball courts, basketball courts, playgrounds, fitness equipment, restrooms, spray shower, trash receptacles	1.98	Good/Moderate
3	Brooklyn Bridge Park	NYC Parks/Brooklyn Bridge Park Corporation	Dog run, soccer fields, basketball courts, handball courts, kayak/canoe launch sites, volleyball courts, roller hockey, bocce courts, fishing, fitness equipment, barbecuing areas, restrooms, environmental center, bike racks, trash receptacles	85.00	Excellent/High
4	Korean War Veterans Plaza	NYC Parks	Trees, benches, plantings, lighting, trash receptacles, memorial, accessibility ramp	1.20	Good/Low
5	Walt Whitman Park	NYC Parks	Trees, plantings, benches, tables, splash fountain, lighting, drinking fountains	2.91	Excellent/Moderate
6	Squibb Park	NYC Parks	Playground, basketball court, benches, restrooms, plantings	0.63	Good/Low
7	Hillside Dog Park	NYC Parks	Dog run, benches, trees, drinking fountain, tables	1.37	Fair/Moderate
8	Fruit Street Sitting Area	NYC Parks	Benches, plantings, lighting, waterfront view, trees	0.92	Fair/Low
9	Harry Chapin Playground	NYC Parks	Playground, benches, spray showers, trash receptacles	0.30	Good/High
10a	Susan Smith McKinney Steward Park***	NYC Parks	Playground, benches, restrooms, turf field, fitness equipment, track, trash receptacles, trees	1.88	Good/Moderate
10b	Maritcha R Lyons Park**	NYC Parks	Benches, trees	0.23	Good/Moderate
11	Brooklyn Heights Promenade	NYCDOT	Benches, plantings, trees, waterfront view, trash receptacles	2.20	Good/Moderate
12	Fort Stirling Park	NYC Parks	Trees, plantings, lighting	0.21	Good/Low
13	Pierrepont Playground	NYC Parks	Playground, restrooms, benches, drinking fountains	0.5	Fair/High
14	90 Sands Street	90 Sands Street Housing Development Fund	Benches, plantings, trees, trash receptacles, drinking fountains	0.18	Good/Low
15	203 Jay Street	Jay Street Associates, LLC	Benches, plantings, trees, rocks for sitting, trash receptacles, drinking fountain	0.24	Excellent/Moderate
16	Old Fulton Street Pedestrian Plaza	NYCDOT	Tables and chairs, plantings, bike racks, retail, trees	0.21	Good/Moderate
17	Pearl Street Pedestrian Plaza	NYCDOT	Seating, plantings, tables and chairs, lighting, programming, trash receptacles, maps	0.83	Good/High
Totals				**111.17**	

Note: *See **Figure E-2** for location of each open space in the study area.
**Susan Smith McKinney Park and Maritcha R Lyons Park collectively form Bridge Park.
Sources: NYC Parks open space database; AKRF, Inc. field surveys, July 2025

Table E-3
Adequacy of Study Area Open Space Resources: Existing Conditions

Existing Residential Population	Open Space Acreage Total	Open Space Ratio Acres per 1,000 Residents Total	City Open Space Guideline Total
27,772	111.17	4.003	2.5

Qualitative Considerations

As shown in **Table E-2**, the study area open spaces include a wide variety of actively programmed spaces appropriate for all age groups. As indicated in the *CEQR Technical Manual*, adults tend to utilize active recreational amenities (such as handball and basketball courts) as well as open lawns and other passive recreational amenities, and open spaces within the study area include such facilities. Of the 17 open space resources in the study area, three are in fair condition, eleven are in good condition, and three are in excellent condition. Five resources were noted as experiencing low utilization, seven were noted as experiencing moderate utilization, and five were noted as experiencing high utilization.

In addition to the open space resources listed above, the study area contains open space resources that have not been included in the quantitative assessment. This includes several community gardens located in the study area, as listed in **Table E-4**, totaling 0.16 acres.

Table E-4
Community Gardens in the Study Area

Map ID	Name	Acres
A	Poplar Street Community Garden	0.10
B	Vinegar Hill Community Garden	0.06
Total		**0.16**

Note: See **Figure E-2** for location of each open space in the study area.
Sources: NYC Parks open space database; AKRF, Inc. field surveys, July 2025

D. THE FUTURE WITHOUT THE PROPOSED ACTIONS

As described in Attachment A, “Project Description,” in the No Action condition, the Project Area would be retenanted with complying commercial uses in the existing buildings. These uses are permitted under existing zoning; no discretionary actions would be required, and no residential development would occur.

STUDY AREA POPULATION

In the No Action condition, the study area would continue to experience residential development. There are 263 dwelling units anticipated to be constructed within the study area by 2031, and these dwelling units are estimated to introduce a new population of 531 residents. Absent the Proposed Development, the total population of the study area would be expected to rise to 28,803 by 2031.

STUDY AREA OPEN SPACE RESOURCES

In the No Action condition, the study area’s existing open space resources would continue to be open for public use.

ADEQUACY OF OPEN SPACES

Quantitative Assessment

As shown in **Table E-5**, in the No Action condition, the total open space ratio is projected to decrease from 4.003 acres per 1,000 residents to 3.928 acres per 1,000 residents. Similar to existing conditions, the ratio would far exceed City guidelines.

Table E-5
Adequacy of Study Area Open Space Resources: No Action Condition

No Action Residential Population	Open Space Acreage Total	Open Space Ratio Acres per 1,000 Residents Total	City Open Space Guideline Total
29,756	111.17	3.928	2.5

Qualitative Considerations

The study area contains a mix of recreational facilities, as stated above, and the open space ratio would continue to far exceed the guideline goal of 2.5 total acres per 1,000 residents. Similar to the existing condition, study area open spaces in the No Action condition would continue to include a wide variety of actively and passively programmed spaces appropriate for all age groups.

E. THE FUTURE WITH THE PROPOSED ACTIONS

STUDY AREA POPULATION

With the Proposed Actions, the Proposed Development would result in an incremental increase of 716 dwelling units. These units are anticipated to introduce 1,453 new residents to the Project Area, bringing the total study area population to 29,756.

STUDY AREA OPEN SPACE RESOURCES

Study area open space resources are expected to remain the same as in existing conditions and the No Action condition.

ADEQUACY OF OPEN SPACES

Quantitative Assessment

As shown in **Table E-6**, the total open space ratio is projected to fall from 3.928 acres per 1,000 residents in the No Action condition to 3.736 acres per 1,000 residents in the With Action condition. As in the No Action condition, the open space ratio in the With Action condition would far exceed the City guideline of 2.5 acres of total open space per 1,000 residents. Compared to the No Action condition, the open space ratio would decrease by 4.9 percent (see **Table E-7**).

Table E-6
Adequacy of Study Area Open Space Resources: With Action Condition

With Action Residential Population	Open Space Acreage Total	Open Space Ratio Acres per 1,000 Residents Total	City Open Space Guideline Total
29,756	111.17	3.736	2.5

Table E-7
Study Area Open Space Ratio Summary

Ratio	City Open Space Guideline	Open Space Ratio Acres per 1,000 Residents		Percent Change (Future No Action to Future With Action Condition)
		No Action	With Action	
Total—Residential	2.5	3.928	3.736	-4.90%

According to the *CEQR Technical Manual*, a decrease in the open space ratio of five percent or more compared to the No Action condition is generally considered to have the potential for a significant adverse impact for projects in study areas where the open space ratio (OSR) is 2.01 to 2.50 or greater[3] acres per 1,000 residents, and may warrant further analysis. The open space ratio in the study area far exceeds 2.5 acres per 1,000 residents, at 4.287 acres per 1,000 residents, and has a decrease in the open space ratio that is less than five percent. The Project Area is also just steps from Brooklyn Bridge Park, a significant regional and destination open space resource. Therefore, a detailed analysis is not warranted, and the Proposed Actions would not result in a significant adverse impact.

Qualitative Considerations

The Proposed Development's population is not expected to have any special or unique characteristics that would place added demands on open spaces that cater to a specific user group. Similar to the existing and No Action conditions, under the With Action condition, study area open spaces would include a wide variety of open space amenities appropriate for all age groups. All of the open space resources in the study area are in fair to excellent condition and mostly experience low to high utilization, allowing them to further absorb projected population increases.

Furthermore, as detailed in **Table E-4**, several community gardens are also located in the study area, which would provide additional open space to support the needs of area residents. As the Project Area is not located within a known walk gap area, it is more easily accessible to neighborhood open spaces.

IMPACT SIGNIFICANCE AND CONCLUSIONS

According to the *CEQR Technical Manual*, a decrease in the open space ratio of five percent or more compared to the No Action condition is generally considered to have the potential for a significant adverse impact for projects in study areas where the open space ratio is 2.01 to 2.50 acres or greater per 1,000 residents, and may warrant further analysis. These reductions may result in overburdening existing facilities or further exacerbating a deficiency in open space. In

[3] Per the *CEQR Technical Manual*, "2.5 OSR is the planning goal in NYC, with optimal distribution goal of 2.0 active OSR and 0.5 passive OSR."

accordance with *CEQR Technical Manual* impact criteria, the decrease in the open space ratio in the study area is less than 5 percent, and the total open space ratio in existing, No Action, and With Action conditions would far exceed City guidelines. Therefore, a detailed analysis of indirect effects on open space is not warranted.

As described above, Brooklyn Bridge Park is a substantial regional park that is located within the study area, just steps from the Project Area. Further, in addition to the open space resources listed in **Table E-2**, there are two community gardens that have not been included in the quantitative assessment, but are located near the study area and available for public use. Given these conditions, the projected decrease in the open space ratio in the With Action condition would not result in a significant adverse impact on open space resources. ✷

Attachment F: Shadows

A. INTRODUCTION

This attachment examines the potential for the Proposed Actions to result in new shadows on sunlight-sensitive resources, which include publicly accessible parks and other open spaces, sunlight-sensitive features of historic resources, and natural resources that depend on sunlight.

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project") at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2) (together, the "Project Area"). As described in Attachment A, "Project Description," a Reasonable Worst-Case Development Scenario (RWCDS) was developed assuming full utilization of allowable floor area ratio (FAR) under the proposed zoning districts, even though the Proposed Development would not utilize all floor area permitted under the proposed rezoning on Projected Development Site 2. The RWCDS for the EAS includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

Following the guidelines of the 2025 *City Environmental Quality Review (CEQR) Technical Manual*, a shadow study is required if proposed actions would result in new structures that would be more than 50 feet taller than what would exist without the proposed actions, and either greater than 250 feet in maximum height, or between 50 and 250 feet and adjacent to, within, or across the street from a sunlight-sensitive resource. The Proposed Development would enlarge portions of the existing buildings on Projected Development Sites 1 and 2 by more than 50 feet. Furthermore, the Development Site is located adjacent to or across the street from multiple publicly accessible open spaces. Consequently, a shadows assessment was conducted.

PRINCIPAL CONCLUSIONS

The detailed shadows analysis concluded that the RWCDS massing allowed by the Proposed Actions would result in new shadows on seven public open space resources and portions of the East River. The analysis further concluded that the new shadows would be transient and limited in extent and duration and would not cause significant adverse impacts to any of the sunlight-sensitive resources in terms of either recreational use or health and survival of plantings and other vegetation, or, in the case of the river, marine biota. Therefore, the Proposed Actions would not result in significant adverse shadow impacts.

B. METHODOLOGY

This analysis has been prepared in accordance with CEQR procedures and follows the guidelines of the *CEQR Technical Manual*.

The following terms are used throughout this appendix and, for the purpose of clarity, corresponding definitions are provided:

- **Incremental shadow** is the additional, or new, shadow that a structure resulting from a proposed project would cast on a sunlight-sensitive resource.
- **Sunlight-sensitive resources of concern** are those that depend on sunlight or for which direct sunlight is necessary to maintain the resource's usability or architectural integrity. Such resources generally include the following:
  - Public open space such as parks, beaches, playgrounds, plazas, schoolyards (if open to the public during non-school hours), greenways, and landscaped medians with seating. Planted areas within unused portions of roadbeds that are part of the Greenstreets program are also considered sunlight-sensitive resources;
  - Features of architectural resources that depend on sunlight for their enjoyment by the public. Only the sunlight-sensitive features need be considered, as opposed to the entire resource. Such sunlight-sensitive features might include: design elements that depend on the contrast between light and dark (e.g., recessed balconies, arcades, deep window reveals); elaborate, highly carved ornamentation; stained glass windows; historic landscapes and scenic landmarks; and features for which the effect of direct sunlight is described as playing a significant role in the structure's importance as a historic landmark; and
  - Natural resources where the introduction of shadows could alter the resource's condition or microclimate. Such resources could include community gardens, surface water bodies, wetlands, and designated resources such as coastal fish and wildlife habitats.
- **Resources not subject to shadows analyses** include the following, for the purposes of CEQR:
  - City streets and sidewalks (except Greenstreets);
  - Private open space (e.g., front and back yards, stoops, vacant lots, and any private, non-publicly accessible open space); and
  - Project-generated open space, which cannot experience a significant adverse shadow impact from the project, according to CEQR, because without the project the open space would not exist. However, a discussion of how shadows would affect the new space may be warranted.
- **A significant adverse shadow impact** occurs when the incremental shadow added by a proposed project falls on a sunlight-sensitive resource and substantially reduces or completely eliminates direct sunlight, thereby significantly altering the public's use of the resource or threatening the viability of vegetation or other resources. Each case must be considered on its own merits based on the extent and duration of new shadow and an analysis of the resource's sensitivity to reduced sunlight, and seasonal conditions.

Following the guidelines of the *CEQR Technical Manual*, a preliminary screening assessment must first be conducted to ascertain whether a project's shadow could reach any sunlight-sensitive resources at any time of year. The preliminary screening assessment consists of three tiers of analysis. The first tier determines a simple radius around the proposed building OR addition representing the longest shadow that could be cast. If there are sunlight-sensitive

resources within this radius, the analysis proceeds to the second tier, which reduces the area that could be affected by project shadow by accounting for the fact that shadows can never be cast between a certain range of angles south of the project site due to the path of the sun through the sky at the latitude of New York City.

If the second tier of analysis does not eliminate the possibility of new shadows on sunlight-sensitive resources, a third tier of screening analysis further refines the area that could be reached by project shadow by looking at specific representative days in each season and determining the maximum extent of project-generated shadow over the course of each representative day.

If the third tier of analysis does not eliminate the possibility of new shadows on sunlight-sensitive resources, a detailed shadow analysis is required to determine the extent and duration of the incremental shadow resulting from the project. Incremental shadows are determined by establishing a baseline condition in the future without a proposed action (the "No Action" condition) and comparing it to the future with a proposed action (the "With Action" condition), thus illustrating the baseline shadows cast by existing (or future No Action) buildings and distinguishing the additional (incremental) shadows cast by a proposed project. The detailed analysis provides the data needed to assess the shadow impacts. The effects of the new shadows on the sunlight-sensitive resources are described, and their degree of significance is considered. The results of the analysis and assessment are documented with graphics, a table of incremental shadow durations, and narrative text.

PRELIMINARY SCREENING ASSESSMENT

A base map was developed using Geographic Information Systems (GIS)[1] to show the location of the Development Site and the surrounding street layout and topography (see **Figure F-1**). Mapped databases of parks and other public open spaces; city, state, and national historic resources; and natural resources were added to the map.[2] In coordination with the open space, historic and cultural resources, and natural resources assessments presented in other sections of this EAS, potential sunlight-sensitive resources were identified.

TIER 1 SCREENING ASSESSMENT

For the Tier 1 assessment, the longest shadow that the proposed buildings could cast is calculated, and, using this length as the radius, a perimeter is drawn around the project site. Anything outside this perimeter representing the longest possible shadow could never be affected by project-generated shadow, while anything inside the perimeter needs additional assessment.

According to the *CEQR Technical Manual*, the longest shadow that a structure can cast at the latitude of New York City occurs on December 21, the winter solstice, at the start of the analysis day (90 minutes after sunrise[3]), and is equal to 4.3 times the height of the structure.

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[1] Software: Esri ArcGIS Pro 3.5.

[2] Data: City, State, and Federal agencies including New York City Department of Parks and Recreation (NYC Parks); New York City Office of Technology & Innovation (OTI), New York City Department of City Planning, New York City Landmarks Preservation Commission, New York City Department of Transportation, New York State Office of Parks, Recreation, and Historic Preservation, New York State Department of Environmental Conservation (NYSDEC), U.S. Fish and Wildlife Service, and others; supplemented by Nearmap hi-resolution imagery, and AKRF site visits.

[3] As explained in more detail below in the "Tier 3 Screening Assessment" section, shadows occurring within 90 minutes of sunrise or sunset are not considered significant under CEQR.

1.13.26



0 1,000 FEET

1 *Projected Development Site*

Tier 1 Shadow Study Area Perimeter

Tier 2: Area South of Site That Could Never Be Shaded by Proposed Development

Publicly Accessible Open Space

N# *Natural Resource*

Proposed maximum building elevation = +256 feet (referencing North American Vertical Datum of 1988 [NAVD 88]). The Tier 1 elevation-based longest shadow study area represents a conservative preliminary study area because it assumes the maximum elevation of the Proposed Development casting its longest shadow (occurring 90 minutes after sunrise on December 21) onto a surrounding flat surface at 0 feet NAVD 88, which is approximately mean sea level in the vicinity of New York City. Shadows falling on upland areas would be shorter. See Attachment F, "Shadows," Section C "Tier 1 Screening Assessment" for details.

Map Key	Open Space Resource
1	Hillside Dog Park
2	Squibb Park
3	Brooklyn Bridge Park
4	Old Fulton Plaza
5	Anchorage Plaza
6	Greenstreets triangle, Doughty and McKenny Streets
7	Poplar Street Community Garden
8	Clumber Corner
9	Cadman Plaza Park

Map Key	Natural Resource
N1	East River

As noted in Attachment A, "Project Description and Additional Information," the Applicant's Proposed Development would not utilize all floor area permitted under the proposed rezoning, and therefore, to present a conservative analysis, a RWCDS was developed assuming full utilization of allowable floor area. In the RWCDS, Projected Development Site 1 and Projected Development Site 2 would be enlarged up to approximately 79 feet and 64 feet, respectively.

With regard to building heights, it should be noted that the Development Site is located in an area characterized by substantial topographic variation, generally sloping from higher elevations southeast and south of the Development Site (i.e., from Brooklyn Heights) to lower elevations west and north of the Development Site (i.e., Brooklyn Bridge Park and the East River waterfront). Shadows cast from a location at a higher elevation toward a location at a lower elevation (i.e., downhill) are longer in horizontal distance than they would be on a flat plane, and vice versa. Therefore, to ensure a conservative catchment area for compiling the preliminary resource inventory on a two-dimensional map, an elevation-based Tier 1 longest shadow study area was calculated based on the RWCDS massing's maximum elevation of +256 feet NAVD 88[1] (relative to 0 feet NAVD 88, which is approximately mean sea level or mean tidal elevation of the nearby East River/Upper New York Bay). At +256 feet, the RWCDS massing's longest shadow would be approximately 1,101 feet in length (256 × 4.3). Using 1,101 feet as the radius, a perimeter was generated around the Development Site, as shown on **Figure F-1**, beyond which no shadows could reach irrespective of topography.

The Tier 1 assessment showed that a number of publicly accessible open spaces are located in the longest shadow study area, as well as one natural resource (a portion of the East River). Therefore, the next tier of screening assessment was required.

TIER 2 SCREENING ASSESSMENT

Because of the path that the sun travels across the sky in the northern hemisphere, no shadow can be cast in a triangular area south of any given project site. In New York City, this area lies between -108 and +108 degrees from true north. **Figure F-1** illustrates this triangular area south of the Project Area. The complementary area to the north within the longest shadow study area represents the remaining area that could potentially experience new project-generated shadow.

The Tier 2 assessment concluded that portions of nine publicly accessible open spaces are located in the remaining longest-shadow study area and require further assessment.

A portion of the East River, an important natural resource, is also in the remaining longest shadow study area and requires further assessment.

The nine publicly accessible open spaces and one natural resource requiring a Tier 3 assessment are listed in **Table F-1**, along with the Tier 3 assessment results.

TIER 3 SCREENING ASSESSMENT

The direction and length of shadows vary throughout the course of the day and also differ depending on the season. In order to determine whether project-generated shadow could fall on a sunlight-sensitive resource, three-dimensional (3D) computer modeling software[2] is used in the Tier 3 assessment to calculate and display a proposed project's shadows on individual representative days of the year. A computer model was developed containing 3D representations

[1] North American Vertical Datum of 1988

[2] Bentley MicroStation

of the elements in the base map used in the preceding assessments, the topographic information of the study area, and the RWCDS Massing.

It should be noted that, for a straightforward and conservative Tier 3 assessment, the RWCDS Massing included the existing portions of Projected Development Sites 1 and 2 as well as the additional floors of the RWCDS as described in Attachment A, "Project Description." However, the three smaller (4 to 5 story) commercial buildings on the Development Site that would remain the same in the No Action and With Action conditions were not included in the Tier 3 assessment.

Representative Days for Analysis

Following the guidance of the *CEQR Technical Manual*, shadows on the summer solstice (June 21), winter solstice (December 21), and spring and fall equinoxes (March 21 and September 21, which are approximately the same in terms of shadow patterns) are modeled to represent the range of shadows over the course of the year. An additional representative day during the growing season is also modeled, generally the day halfway between the summer solstice and the equinoxes (i.e., May 6 or August 6, which have approximately the same shadow patterns).

Timeframe Window of Analysis

The shadow assessment considers shadows occurring between one and a half hours after sunrise and one and a half hours before sunset. At times earlier or later than this timeframe window of analysis, the sun is down near the horizon and the sun's rays reach the Earth at very tangential angles, diminishing the amount of solar energy and producing shadows that are very long, move fast, and generally blend with other shadows. Consequently, shadows occurring outside the timeframe window of analysis are not considered significant under CEQR, and their assessment is not required.

Table F-1
Tier 3 Assessment

Map Reference	Name	Dec. 21	March 21 / Sept. 21	May 6 / August 6	June 21
Publicly Accessible Open Spaces					
1	Hillside Dog Park	No	Potential	Potential	Potential
2	Squibb Park	No	No	No	No
3	Brooklyn Bridge Park	Potential	Potential	Potential	Potential
4	Old Fulton Plaza	Potential	Potential	No	No
5	Anchorage Plaza	Potential	Potential	Potential	Potential
6	Greenstreets triangle, Doughty and McKenny Streets	No	Potential	Potential	Potential
7	Poplar Street Community Garden	No	No	Potential	Potential
8	Clumber Corner	No	No	No	No
9	Cadman Plaza Park	No	No	No	No
Natural Resources					
N1	East River	Potential	Potential	Potential	Potential

Notes:
See **Figures F-2 and F-3** for corresponding resource locations and shadow sweeps.
In the columns representing the representative analysis dates, "No" means that project-generated shadow could not reach the resource, even without accounting for intervening buildings. "Potential" means project-generated shadows could potentially reach the resource on this date and require further assessment.

Tier 3 Screening Assessment Results

Figures F-2 and F-3 illustrate the range of shadows that would occur, in the absence of intervening buildings, from the RWCDS Massing on the four representative days for analysis. As they move clockwise and generally west to east over the landscape, the shadows are shown occurring approximately every 60 minutes from the start of the analysis day (90 minutes after sunrise) to the end of the analysis day (90 minutes before sunset). **Table F-1** summarizes which analysis day or days each resource could potentially receive project-generated shadow.

The Tier 3 assessment concluded that six of the nine publicly accessible open spaces could potentially receive incremental shadow on two or more of the representative analysis days, and these resources (indicated in **Table F-1**) required a detailed analysis. The other three resources were too far away, could not receive project-generated shadow on any representative day, and do not require further assessment. Portions of the East River could also potentially receive incremental shadow and required additional assessment.

DETAILED ANALYSIS

A detailed analysis is warranted when the screening assessment does not rule out the possibility that project-generated shadows would reach sunlight-sensitive resources. The detailed analysis establishes a baseline condition (the No Action condition) to illustrate the shadows cast by existing buildings and other planned developments in the vicinity expected to be completed by a proposed project's build year. This baseline is then compared to the With Action condition to distinguish the additional (incremental) shadow cast by a proposed project. The purpose of the detailed analysis is to determine the extent and duration of new incremental shadows that would be cast on a sunlight-sensitive resource as a result of a proposed project. Because existing (or No Action condition) buildings may already cast shadows on a sunlight-sensitive resource, a proposed project may not result in additional, or incremental, shadows on that resource.

Following the analysis framework described in Attachment A, "Project Description," a detailed analysis was performed for the analysis year of 2029, comparing the With Action condition to the No Action condition. In the No Action condition, the 25 and 30 Columbia Heights buildings, as well as the three smaller buildings on the Projected Development Site 2, would remain as they are in existing conditions. To represent future baseline conditions, three-dimensional representations of existing buildings and future planned developments in the study area were added to the baseline 3D model using best-available spatial and imagery data from the City, Nearmap, and other sources, and information from publicly available filings with the New York City Department of Buildings.

In the With Action condition, as noted above, 25 and 30 Columbia Heights would be enlarged by up to approximately 79 feet and 64 feet respectively, while the three smaller buildings south of, and associated with, 30 Columbia Heights on Projected Development Site 2 would remain unchanged (see Figure 6a in Attachment A, "Project Description," for a graphic representation of the enlargement under the RWCDS). Only the shadows cast by the added floors represent incremental shadow.

Shadows are in constant movement. The utilized computer simulation software produces a minute-by-minute animation showing the movement of shadows over the course of each analysis period. The analysis determines the time when incremental shadow would enter each resource, and the time it would exit. Shadow analyses were performed for each of the representative days and analysis periods indicated in the Tier 3 assessment.

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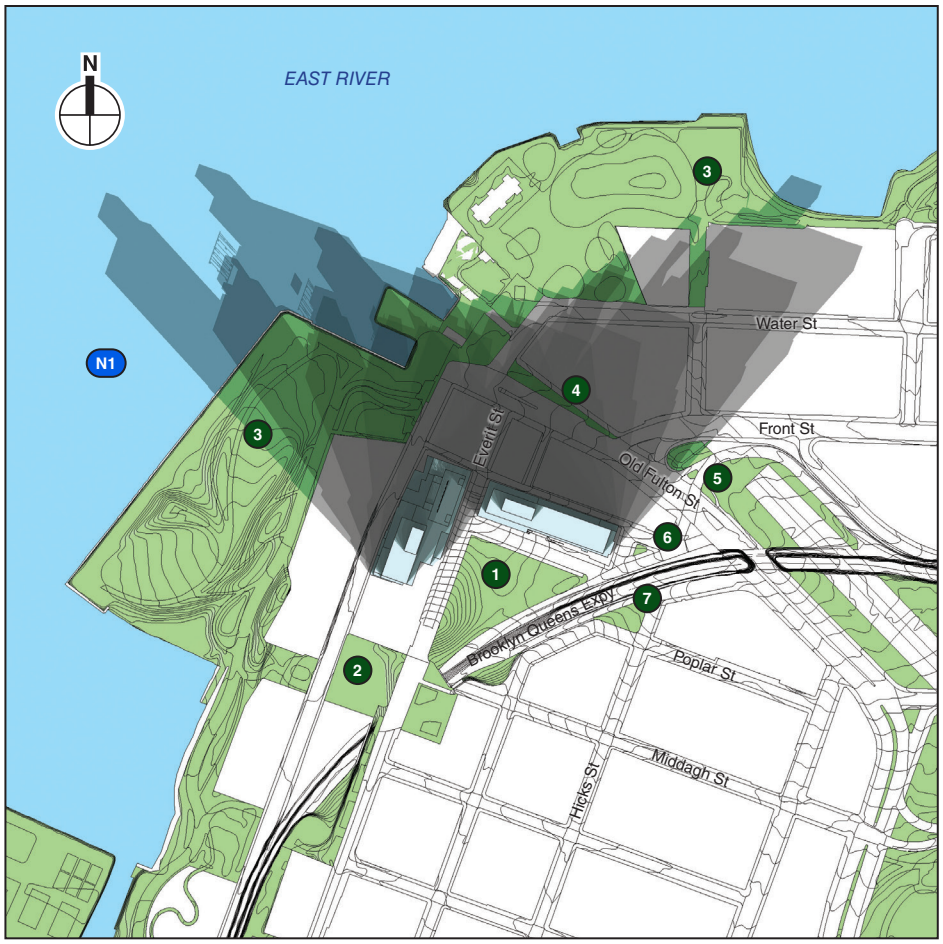
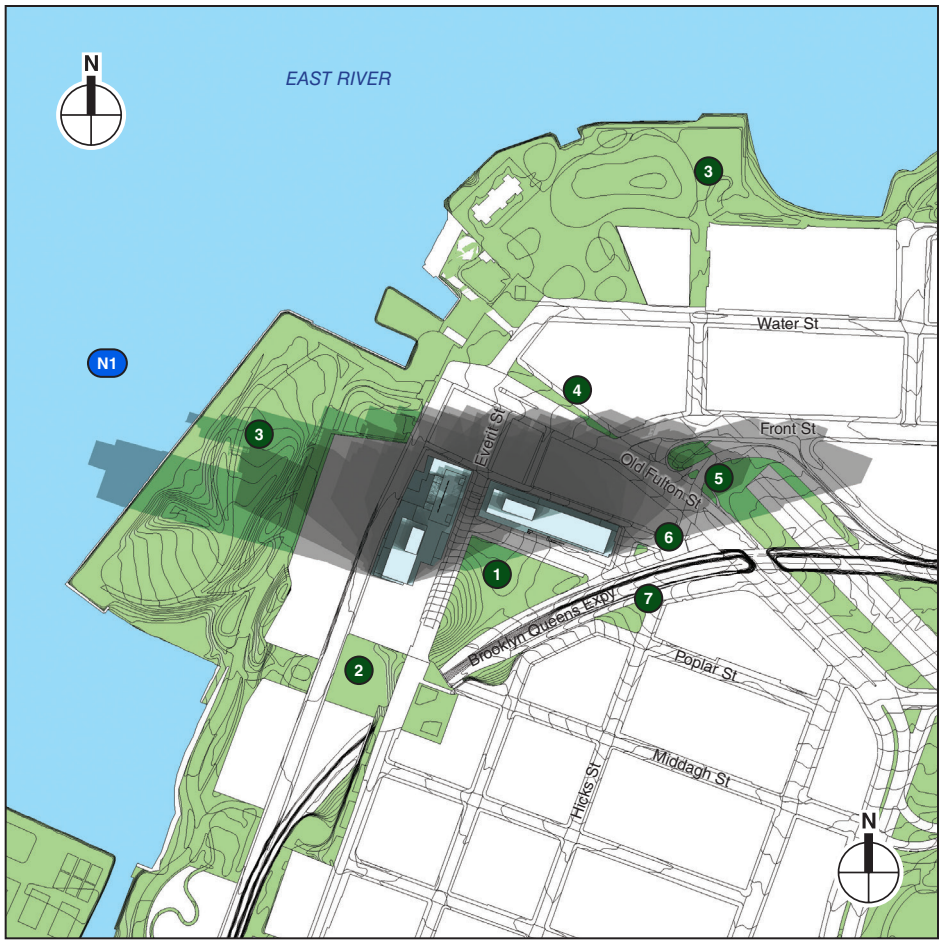


December 21



March 21 / September 21

RWCDS Massing

Publicly Accessible Open Space

Natural Resource

This figure illustrates the range of shadows that would occur from the proposed building on each of the four representative analysis days. The shadows are shown occurring approximately every 60 minutes from the start of the analysis day (90 minutes after sunrise) to the end of the analysis day (90 minutes before sunset). The Tier 3 assessment does not account for future No Action shadows, and the shadows shown in this figure do not represent incremental shadows. The Tier 3 assessment serves to illustrate the daily path or "sweep" of the proposed building's shadows across the landscape, indicating which resources could potentially be affected on that analysis day, absent intervening or surrounding buildings, by project-generated shadow. Daylight Saving Time was not used, per *CEQR Technical Manual* guidelines.

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

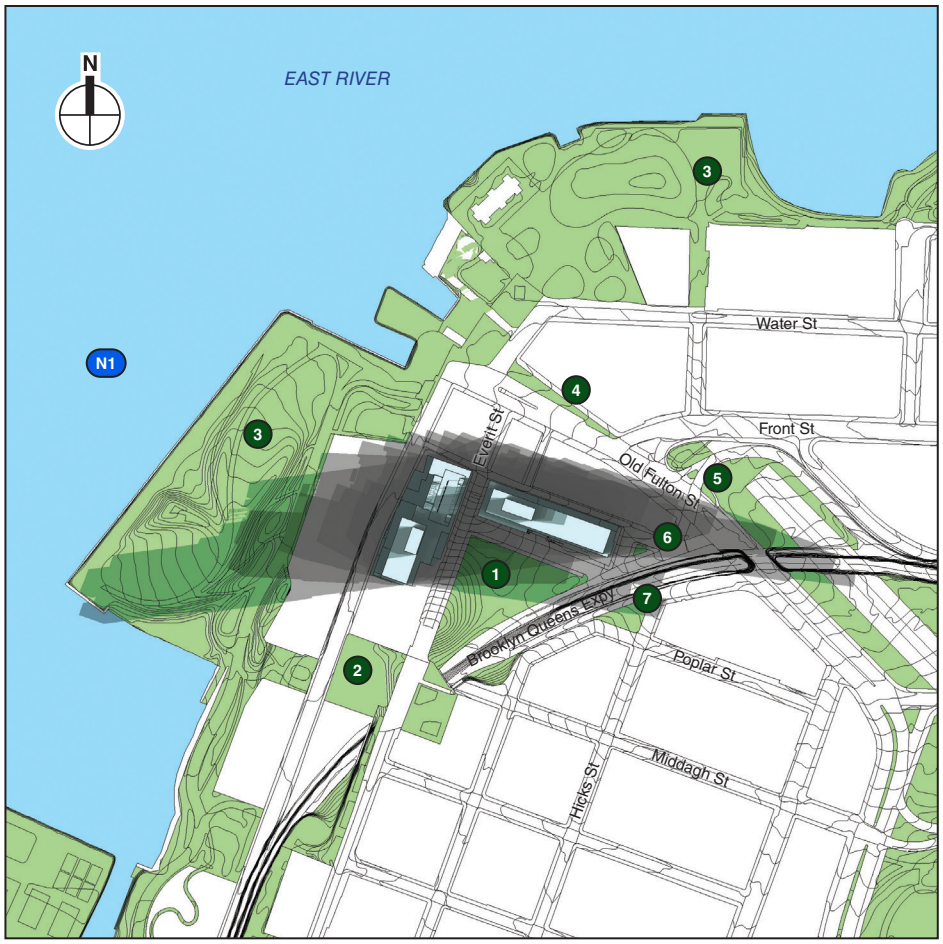
N1. East River

COLUMBIA HEIGHTS REZONING

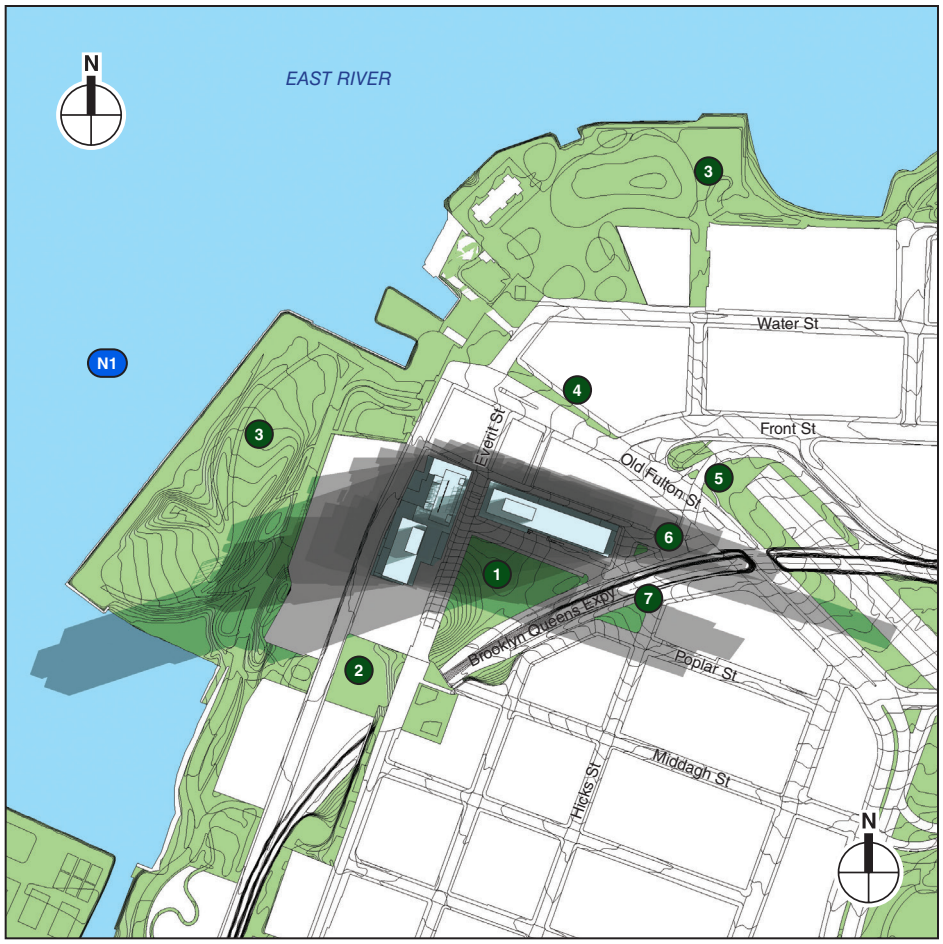
Tier 3 Assessment

Figure F-2

1.9.26



May 6 / August 6



June 21

RWCDS Massing

Publicly Accessible Open Space

Natural Resource

This figure illustrates the range of shadows that would occur from the proposed building on each of the four representative analysis days. The shadows are shown occurring approximately every 60 minutes from the start of the analysis day (90 minutes after sunrise) to the end of the analysis day (90 minutes before sunset). The Tier 3 assessment does not account for future No Action shadows, and the shadows shown in this figure do not represent incremental shadows. The Tier 3 assessment serves to illustrate the daily path or "sweep" of the proposed building's shadows across the landscape, indicating which resources could potentially be affected on that analysis day, absent intervening or surrounding buildings, by project-generated shadow. Daylight Saving Time was not used, per *CEQR Technical Manual* guidelines.

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

Tier 3 Assessment

Figure F-3

COLUMBIA HEIGHTS REZONING

DETERMINATION OF IMPACT SIGNIFICANCE

The determination of significance of shadow impacts on a sunlight-sensitive resource is based on (1) the information resulting from the detailed shadow analysis describing the extent and duration of incremental shadows; and (2) an analysis of the resource's sensitivity to reduced sunlight. The goal of the assessment is to determine whether the effects of incremental shadows on a sunlight-sensitive resource are significant under CEQR.

A shadow impact occurs when the incremental shadow from a proposed project falls on a sunlight-sensitive resource or feature and reduces its direct sunlight exposure. Determining whether this impact is significant or not depends on the extent and duration of the incremental shadow and the specific context in which the impact occurs.

Per CEQR, a significant shadow impact generally occurs when an incremental shadow of 10 minutes or longer falls on a sunlight-sensitive resource and results in one of the following:

- **Vegetation:**
  - A substantial reduction in sunlight available to a sunlight-sensitive feature of the resource to less than the minimum time necessary for its survival (when there was sufficient sunlight in the No Action condition). In the growing season, six to eight hours of direct sunlight is typically a minimum requirement for vegetation. Four to six hours a day of sunlight is a minimum requirement for vegetation that can tolerate partial sun, such as established tree canopies, shrubs, or perennials.
  - A reduction in direct sunlight exposure where the sensitive feature of the resource is already subject to substandard sunlight (i.e., less than the minimum time necessary for its survival).
- **Historic and Cultural Resources:**
  - A substantial reduction in sunlight available for the enjoyment or appreciation of the sunlight-sensitive features of a historic or cultural resource.
- **Open Space Utilization:**
  - A substantial reduction in the usability of open space as a result of increased shadows, accounting for anticipated new users and the open space's utilization rates throughout the affected time periods.
- **For Any Sunlight-Sensitive Feature of a Resource:**
  - Complete elimination of all direct sunlight on the sunlight-sensitive feature of the resource, when the complete elimination results in substantial effects on the survival, enjoyment, or, in the case of open space or natural resources, the use of the resource.

SUMMARY OF ANALYSIS RESULTS

Table F-2 summarizes the entry and exit times and total duration of incremental shadows on each affected sun-sensitive resource. **Figures F-4 to F-53** document the results of the analysis by providing graphic representations from the computer animation of times when incremental shadow would fall on a sun-sensitive resource. The figures illustrate the extent of additional, incremental shadow at that moment in time (highlighted in red), and also show existing shadow and remaining areas of sunlight.

Figures F-4 to F-16 show the December 21 analysis date, **Figures F-17 to F-29** show the March 21/September 21 analysis date, **Figures F-30 to F-40** show May 6/August 6 analysis date, and

2.5.26



8:51 AM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-4

2.5.26



9:15 AM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-5

2.5.26



9:45 AM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-6

2.5.26



10:15 AM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

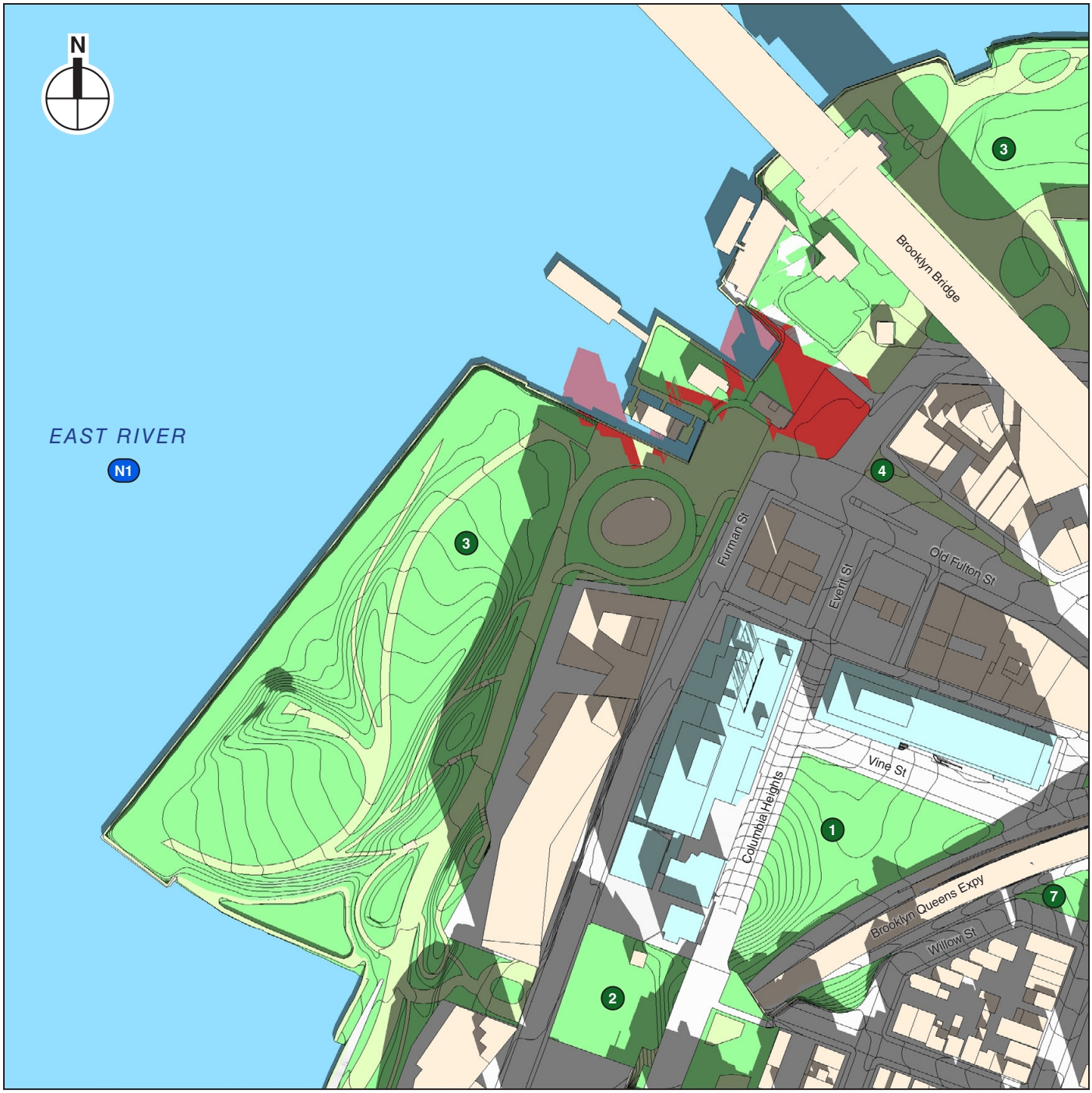
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-7

2.5.26



10:45 AM

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

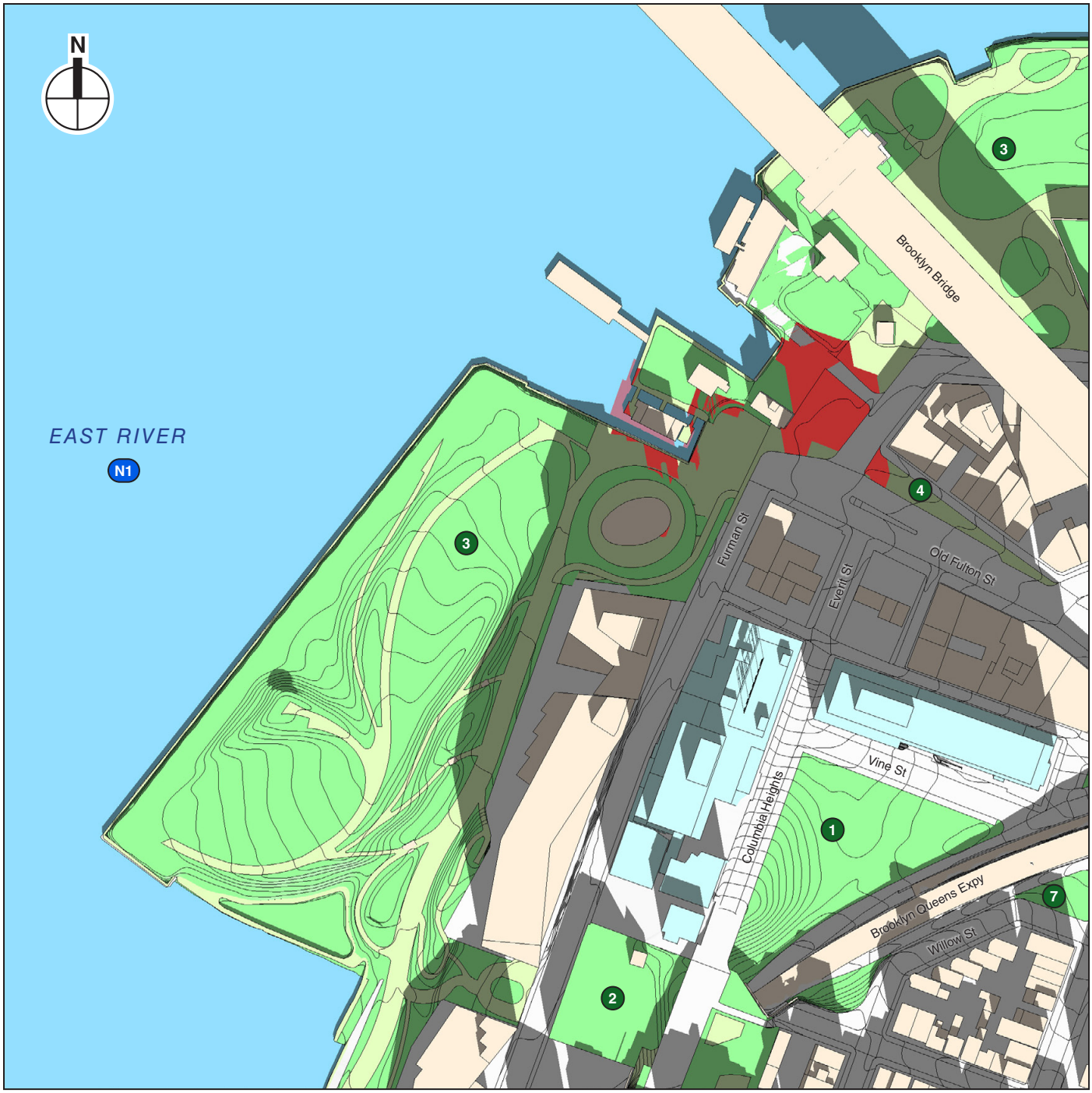
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-8

2.5.26



11:15 AM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-9

2.5.26



11:45 AM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-10

2.5.26



12:15 PM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

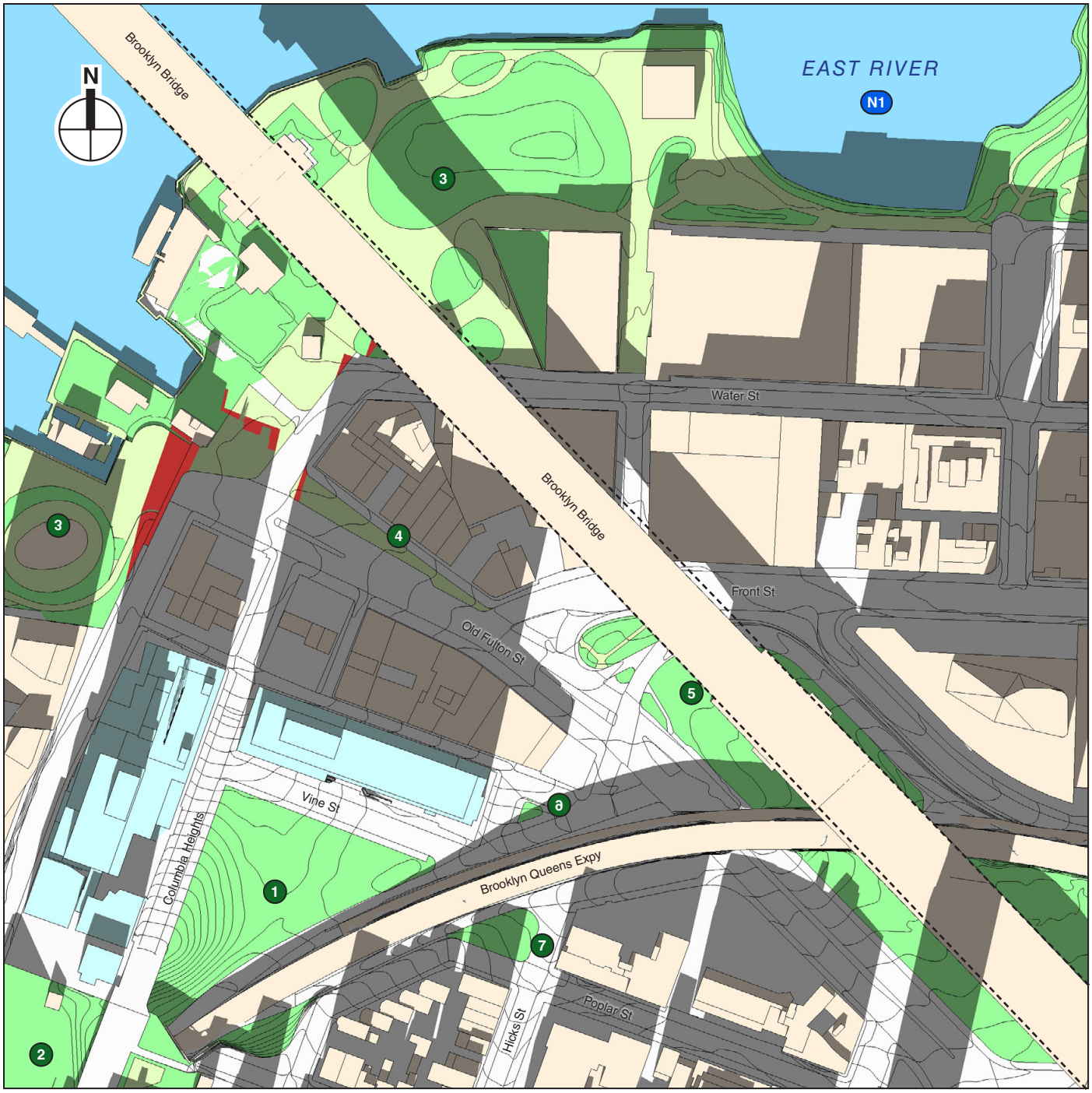
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-11

2.5.26



12:45 PM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

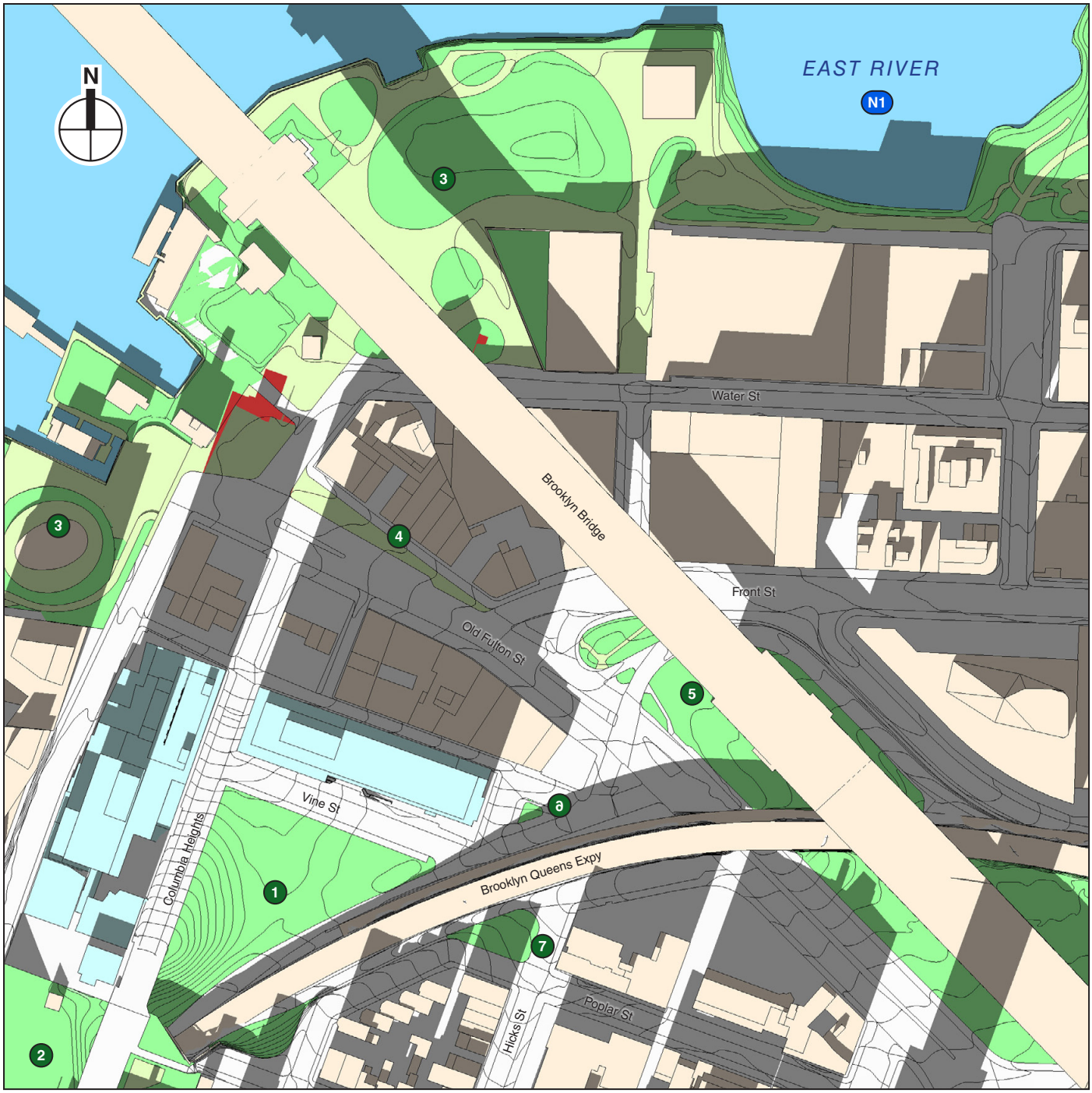
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-12

2.5.26



1:15 PM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

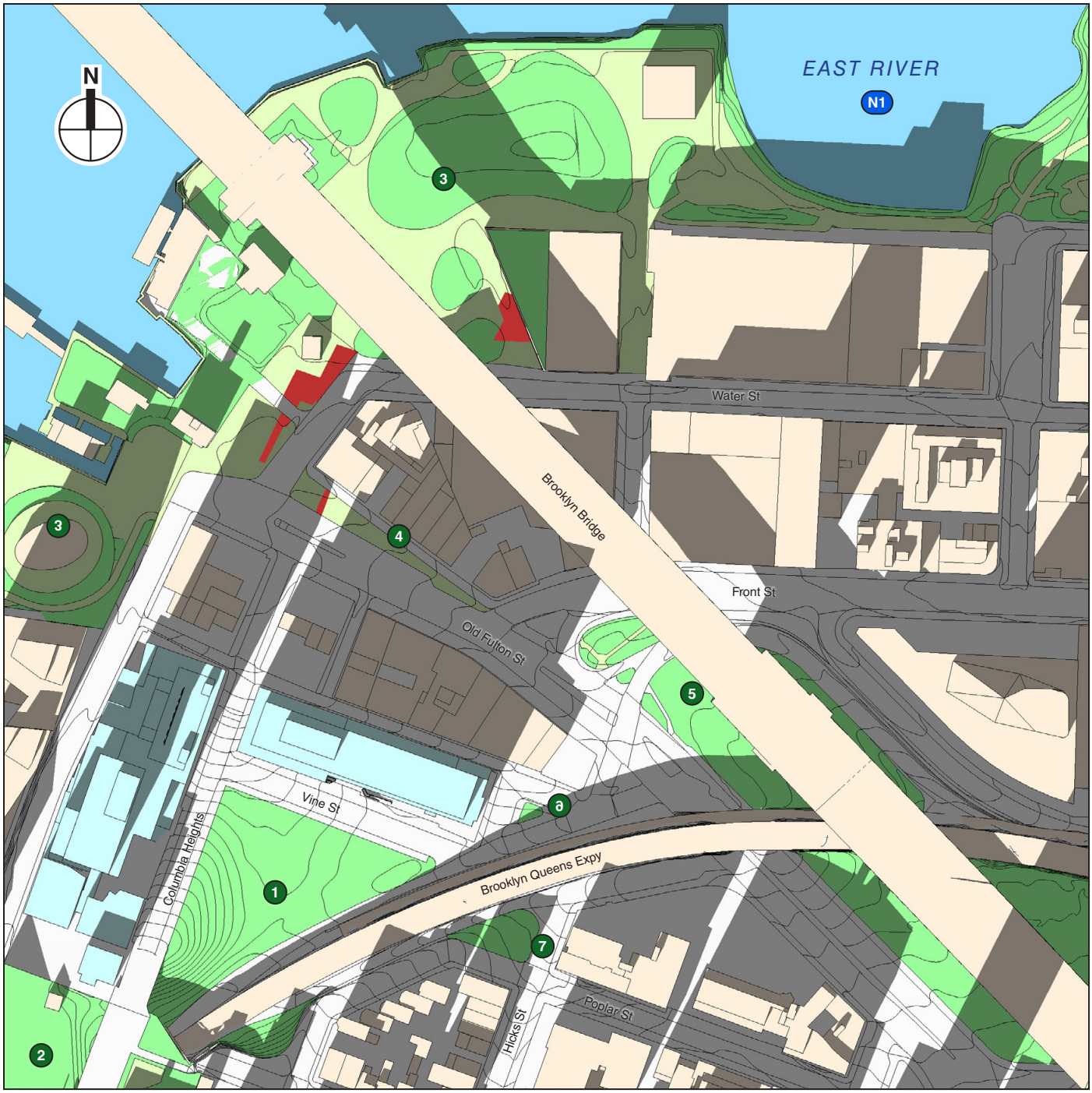
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-13

2.5.26



1:45 PM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

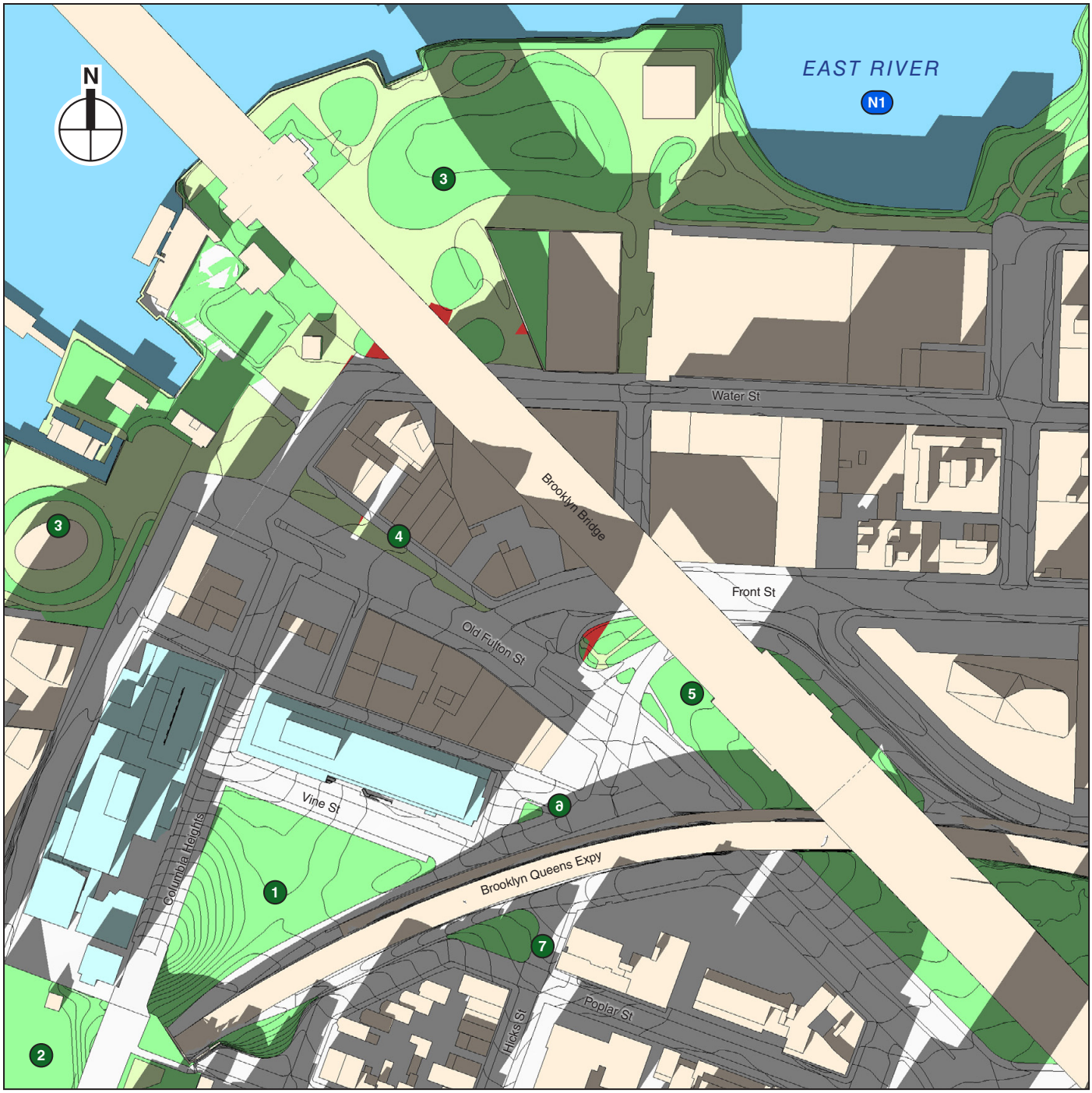
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-14

2.5.26



2:15 PM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

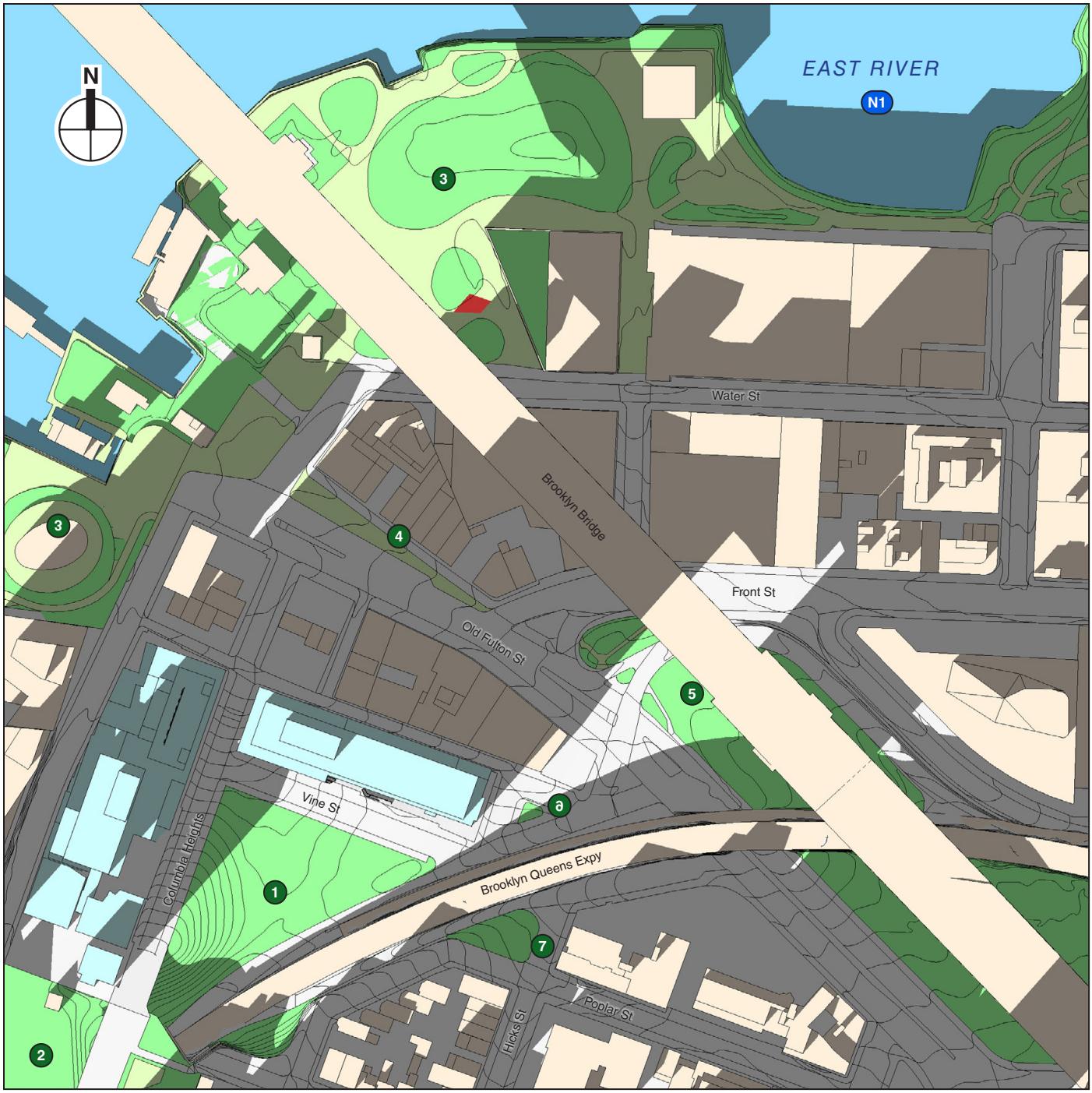
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-15

2.5.26



2:53 PM

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

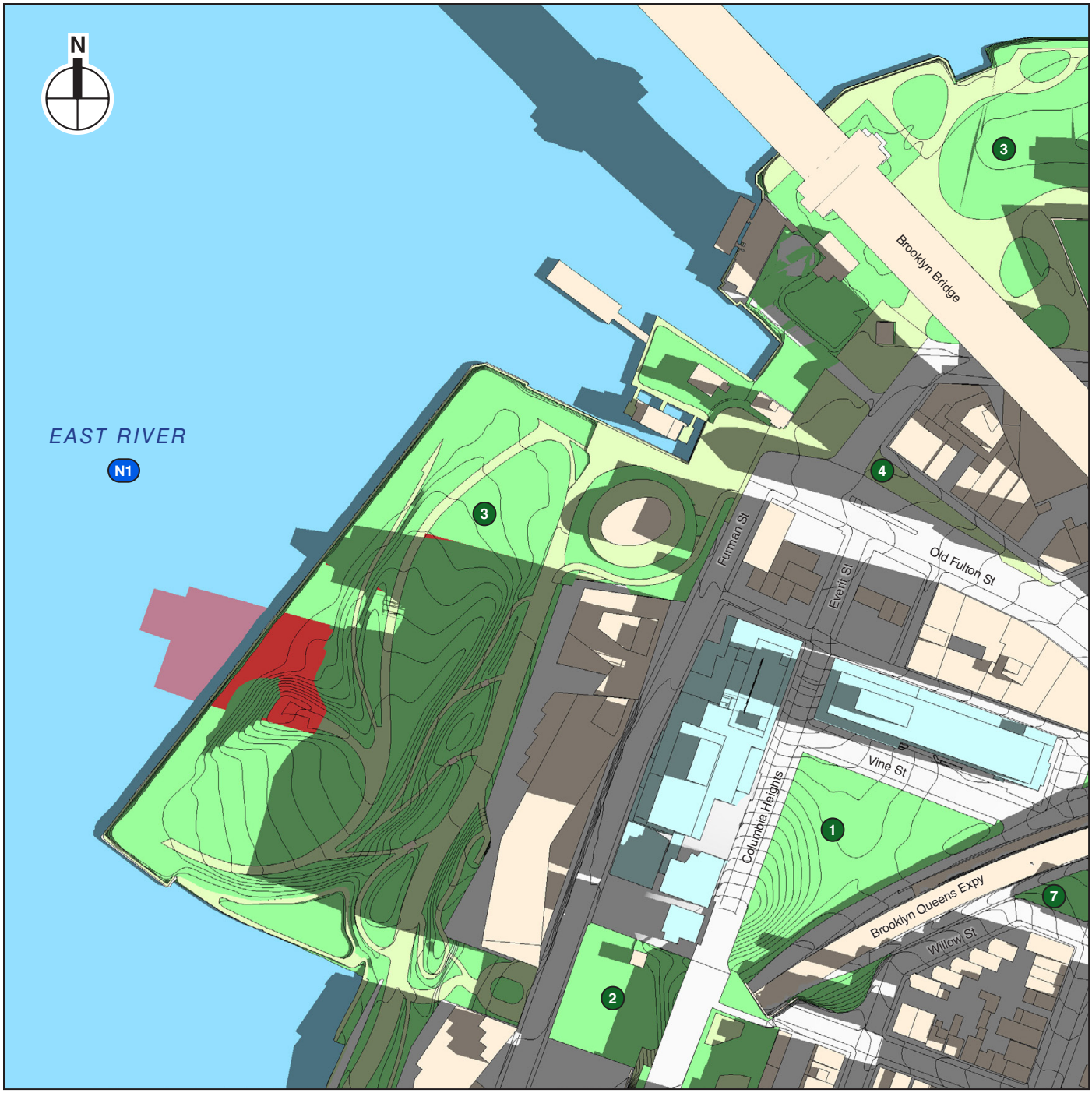
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.

Detailed Analysis
December 21

COLUMBIA HEIGHTS REZONING

Figure F-16

2.5.26



7:36 AM EST (8:36 AM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

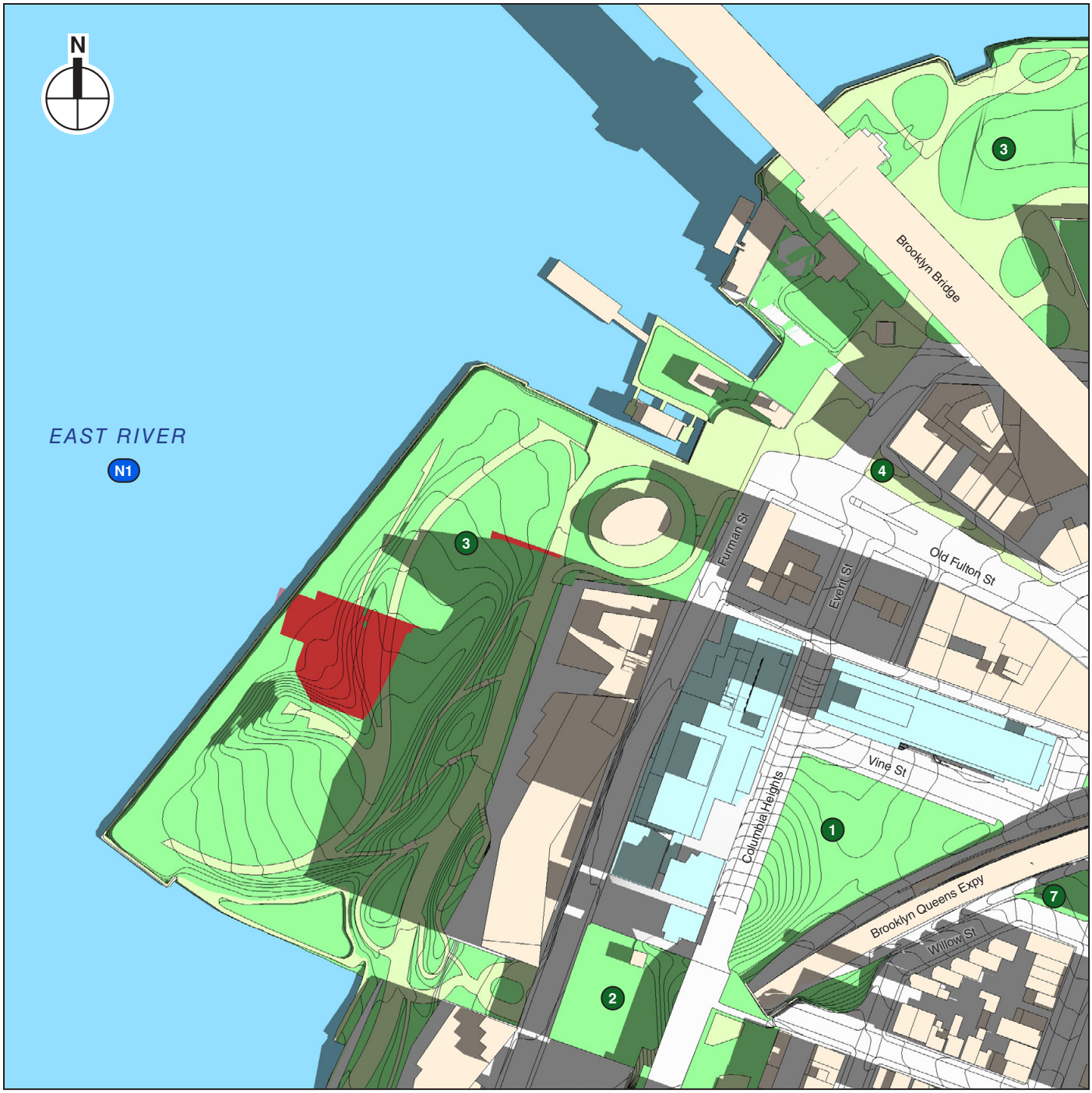
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-17

2.5.26



8:00 AM EST (9:00 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

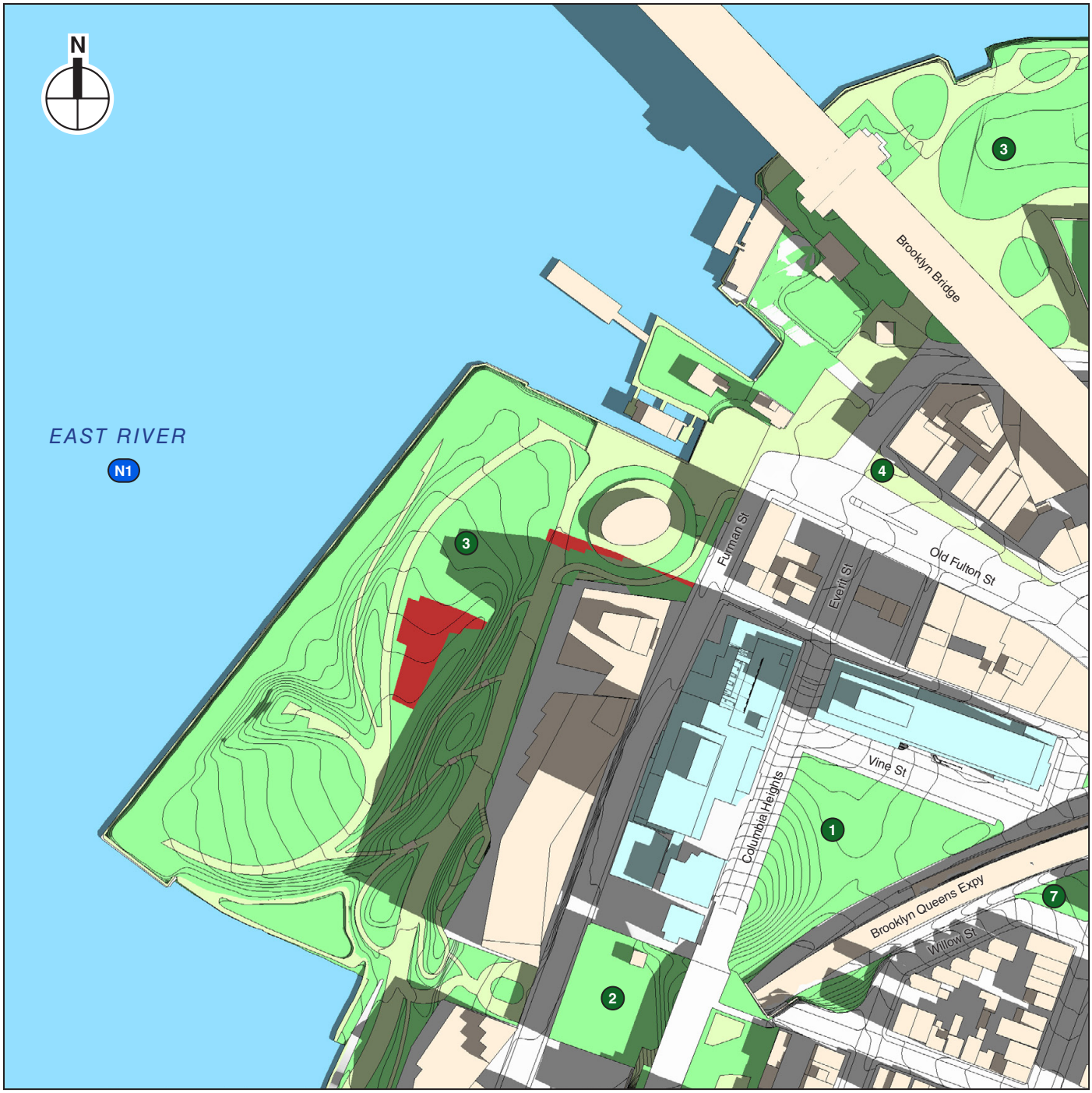
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-18

2.5.26



8:30 AM EST (9:30 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

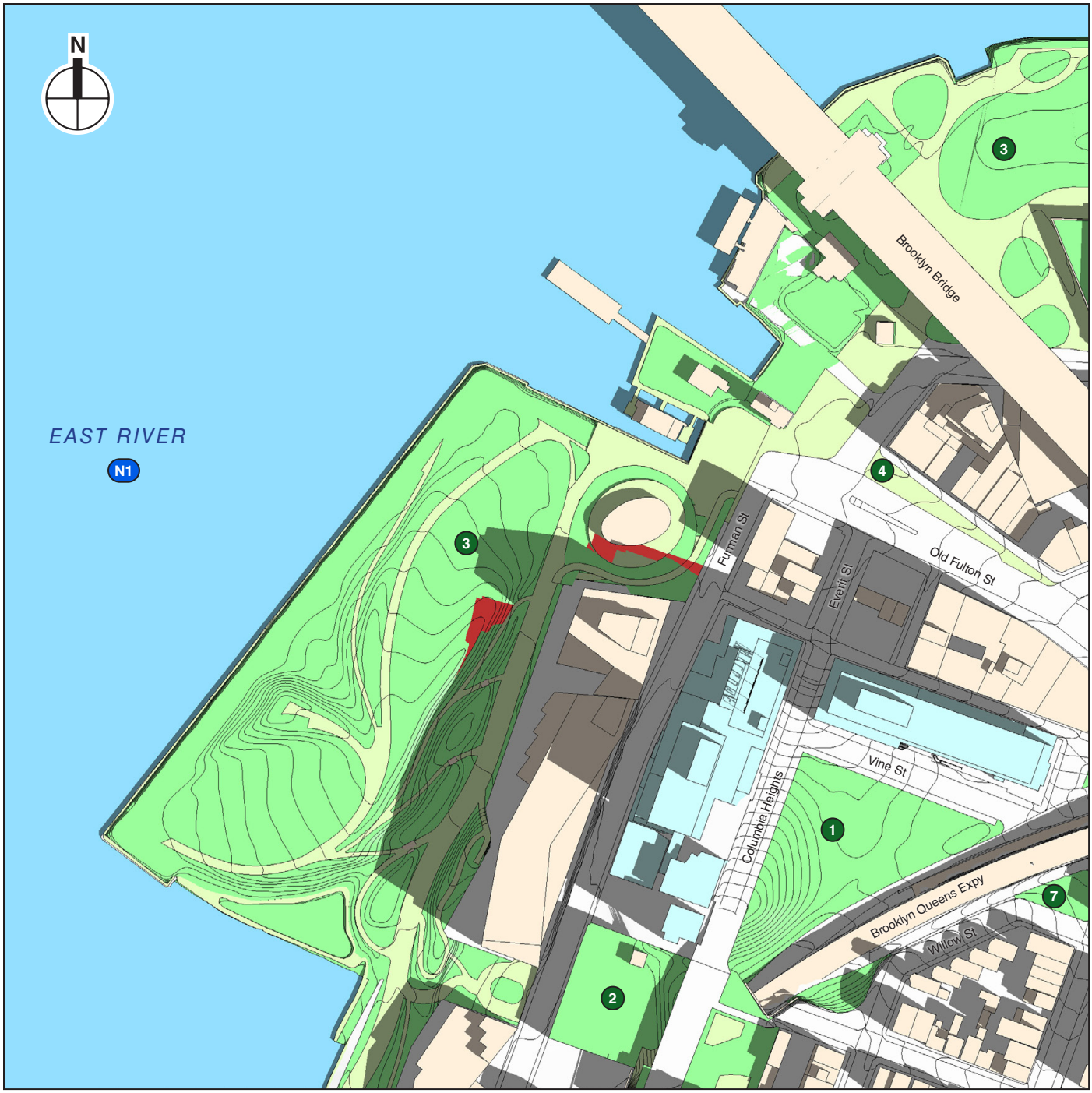
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-19

2.5.26



9:00 AM EST (10:00 AM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

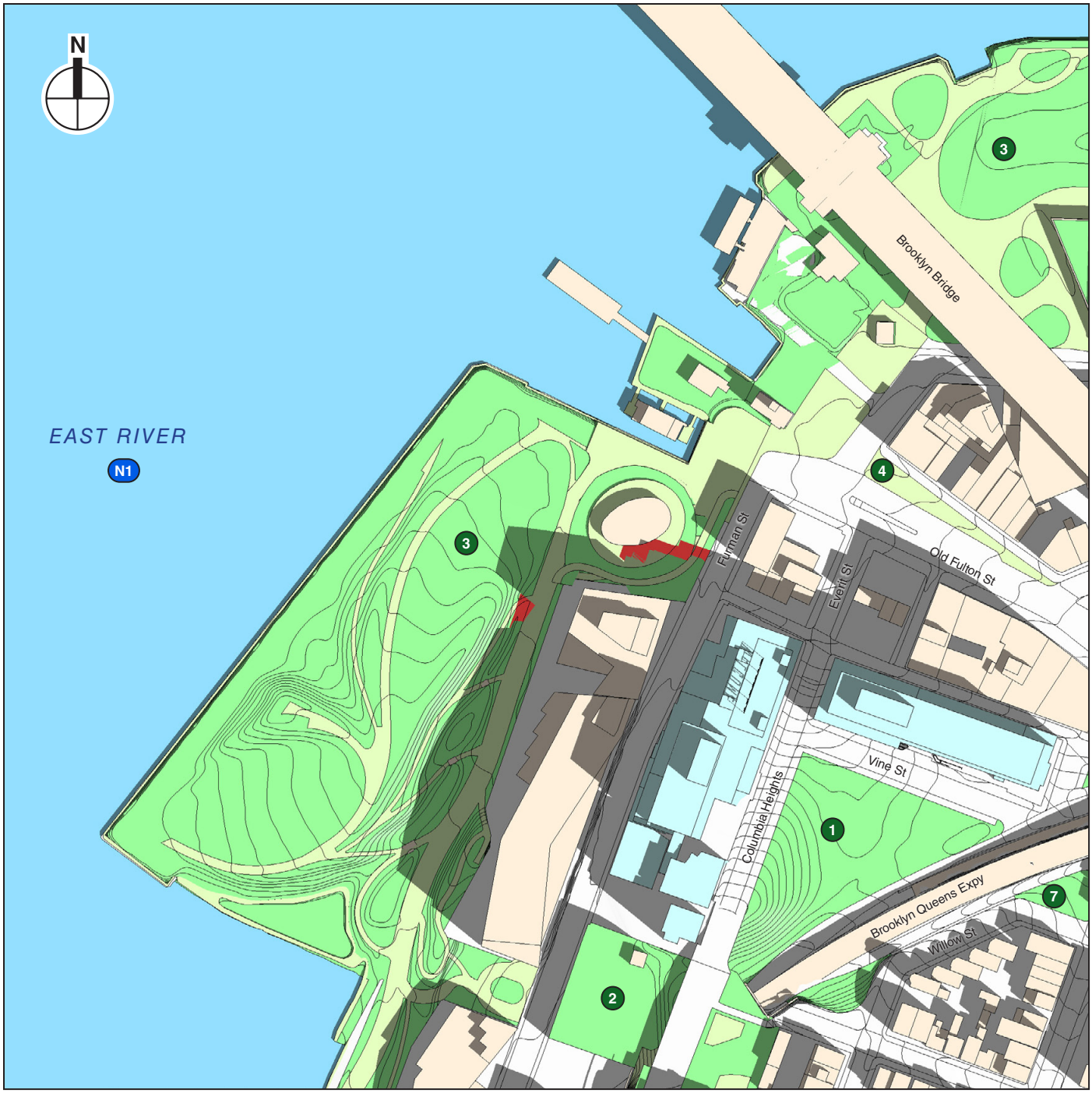
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-20

2.5.26



9:30 AM EST (10:30 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-21

2.5.26



10:00 AM EST (11:00 AM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-22

2.5.26



11:00 AM EST (12:00 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

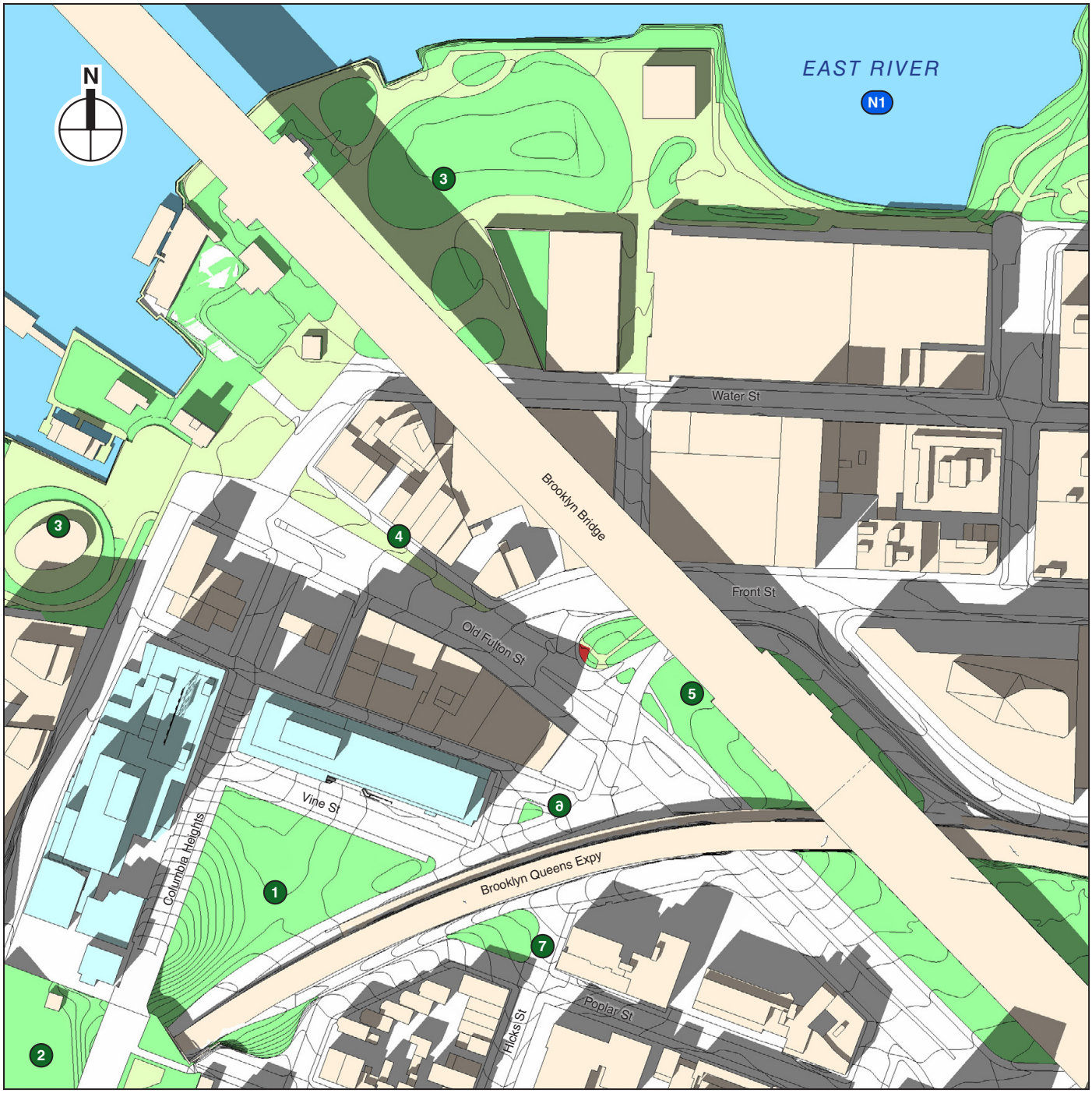
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-23

2.5.26



2:00 PM EST (3:00 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

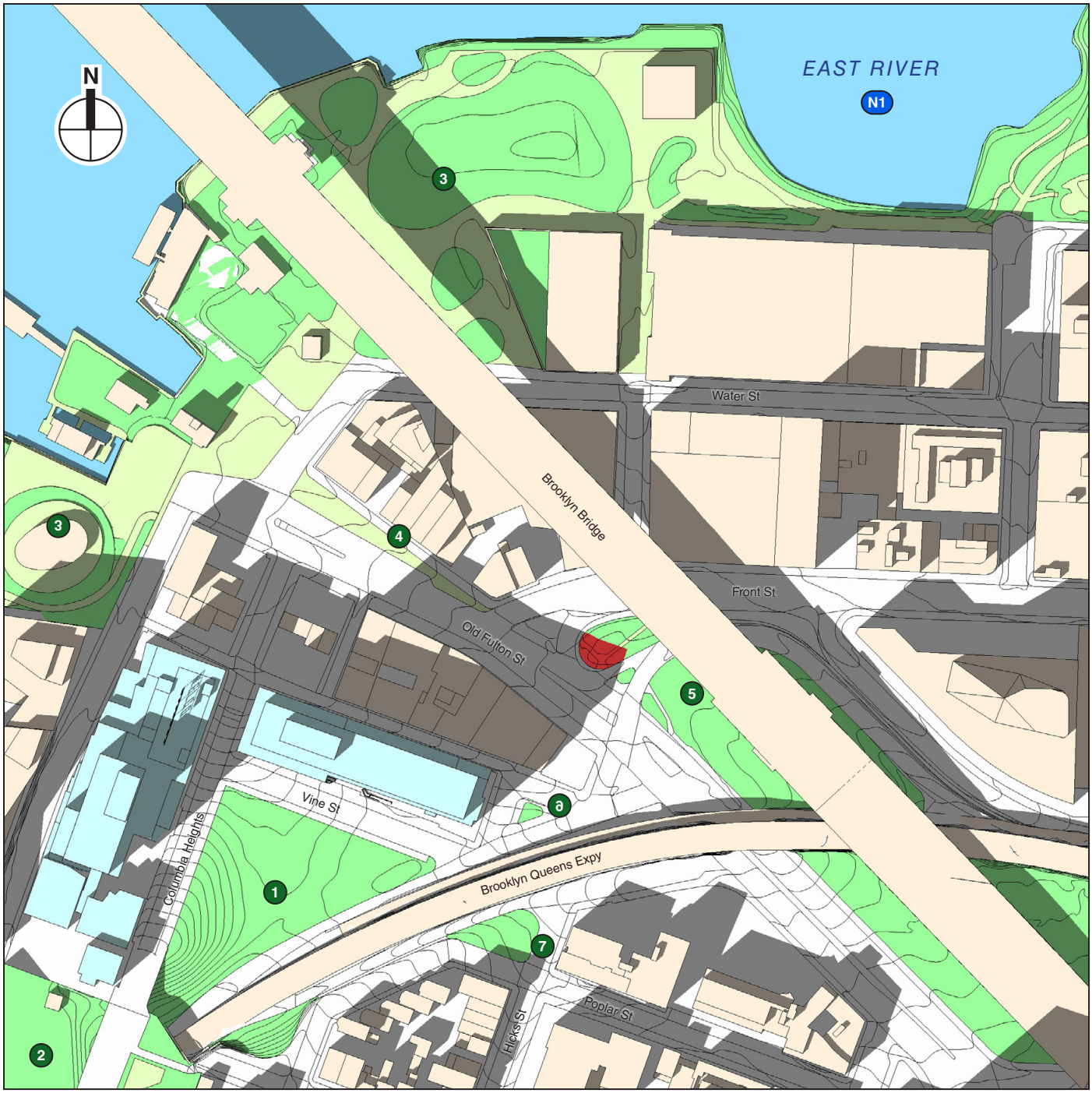
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-24

2.5.26



2:30 PM EST (3:30 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

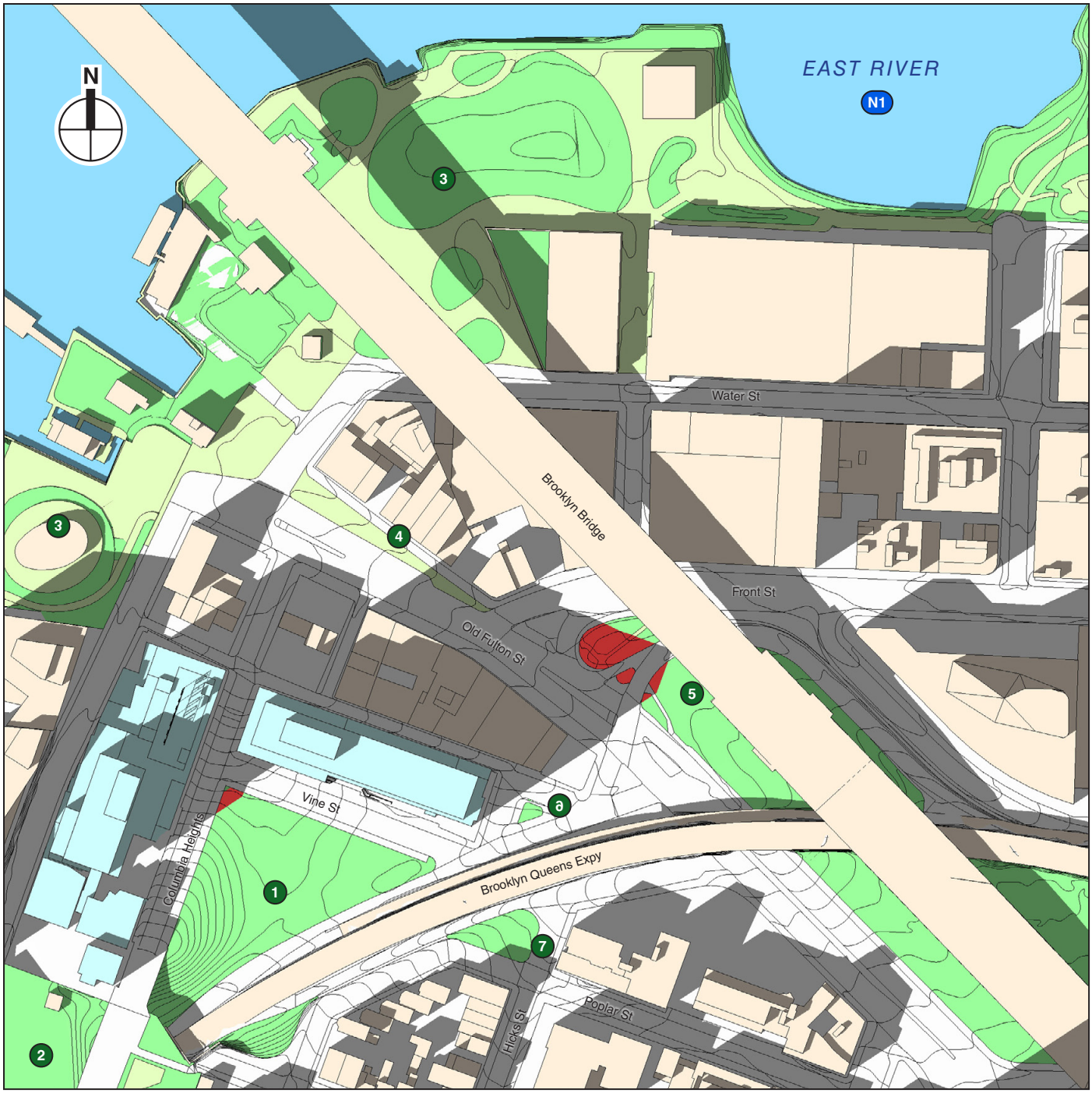
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-25

2.5.26



3:00 PM EST (4:00 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

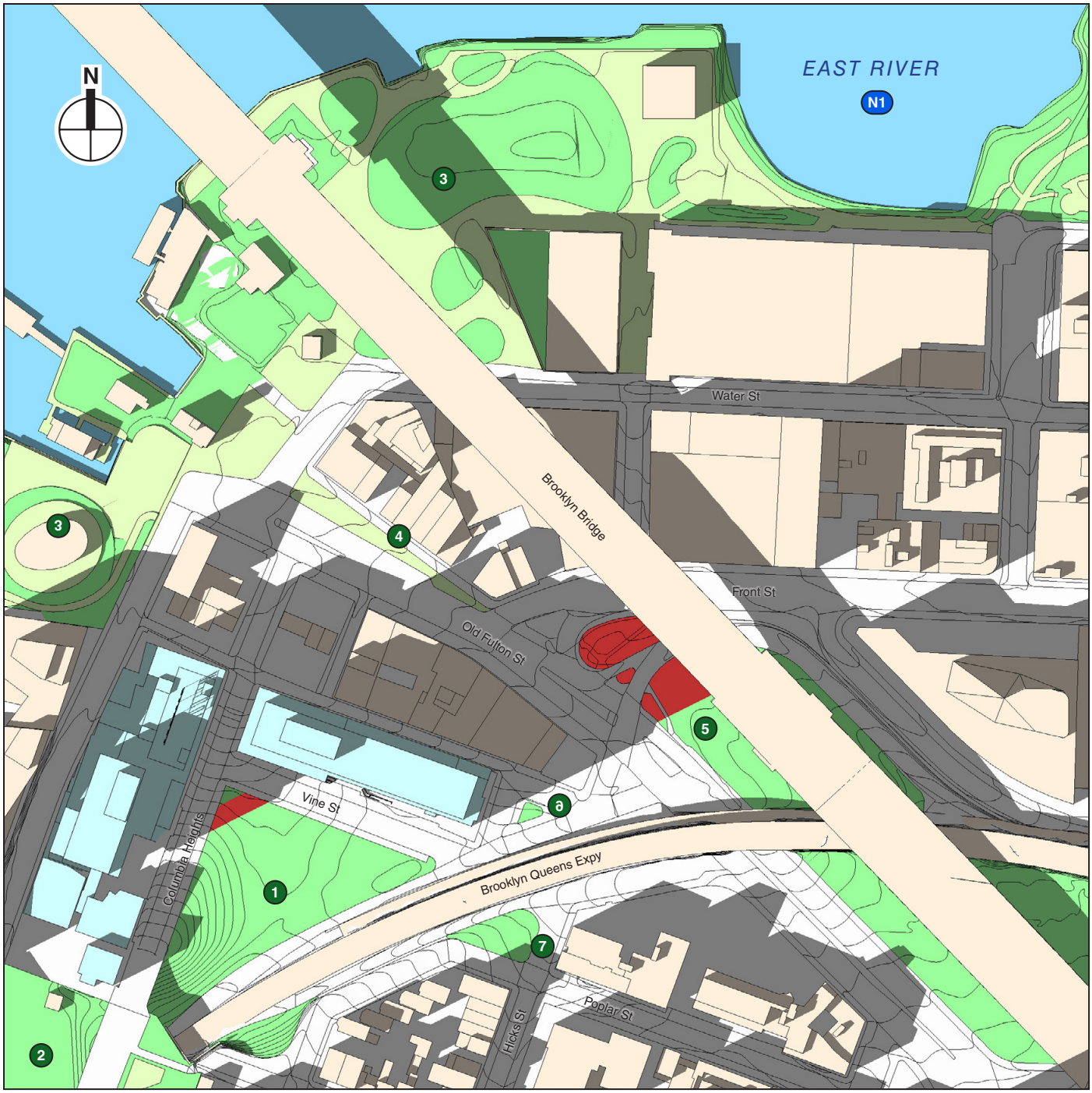
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-26

2.5.26



3:30 PM EST (4:30 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

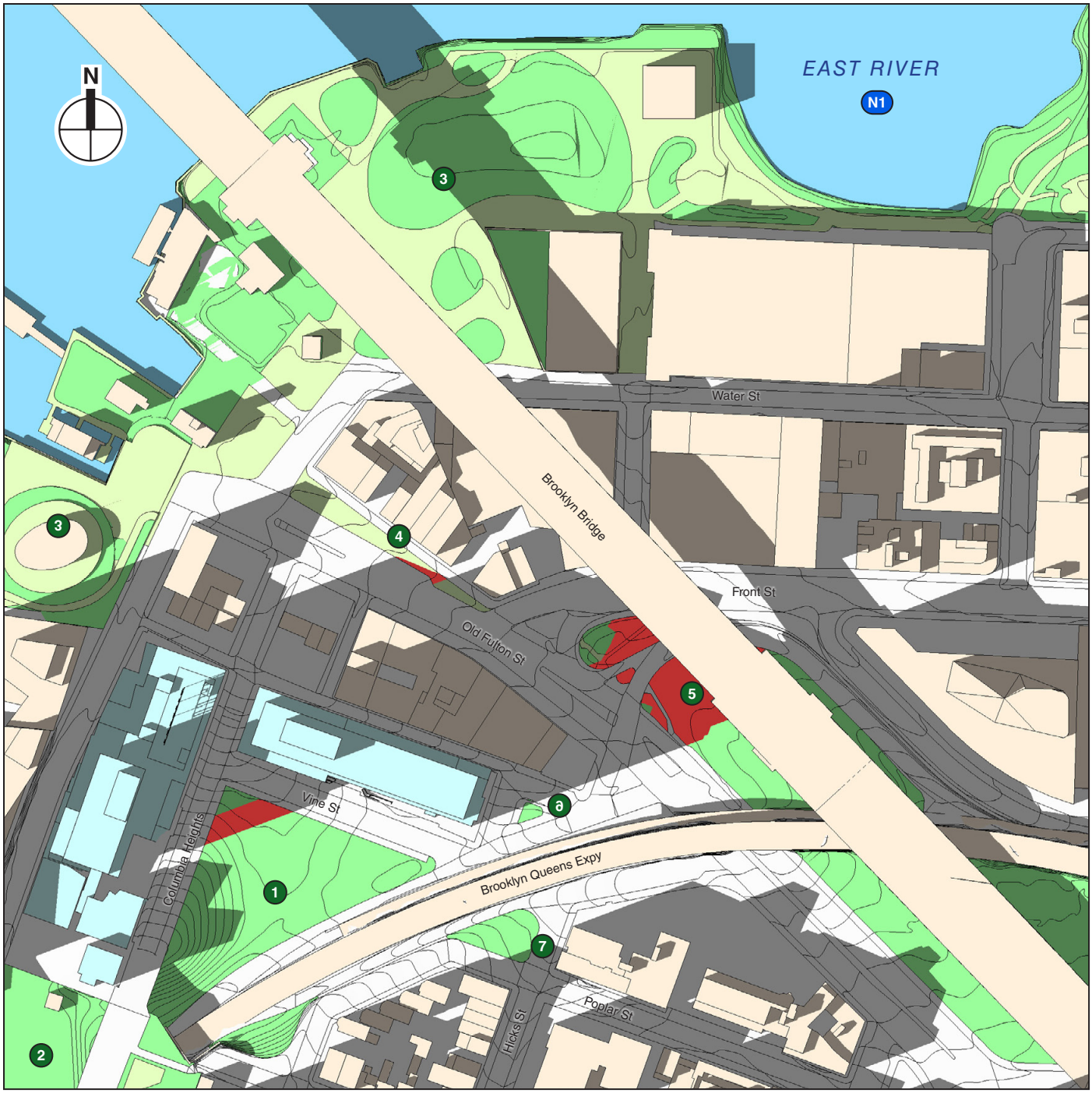
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-27

2.5.26



4:00 PM EST (5:00 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

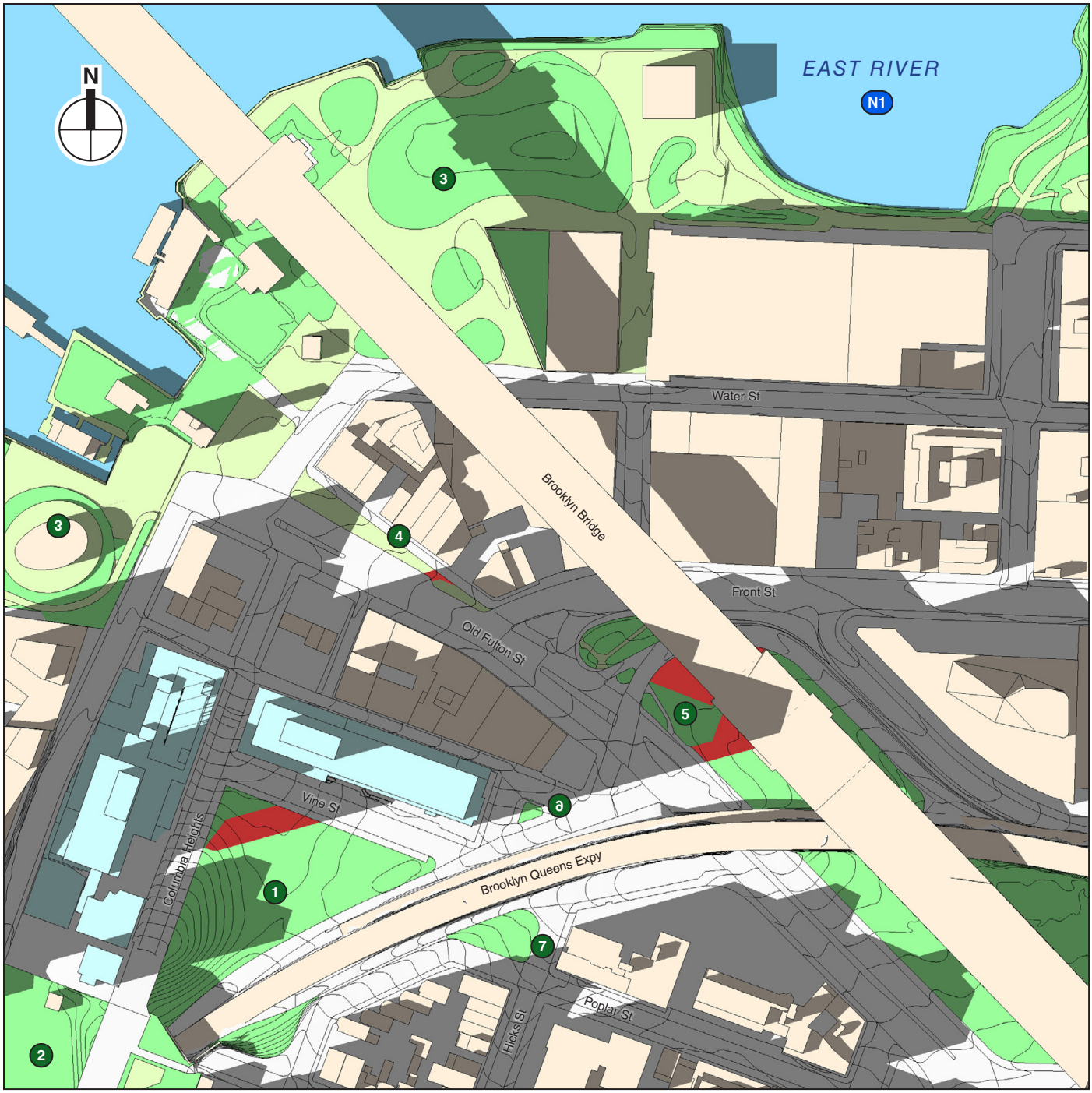
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-28

2.5.26



4:29 PM EST (5:29 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

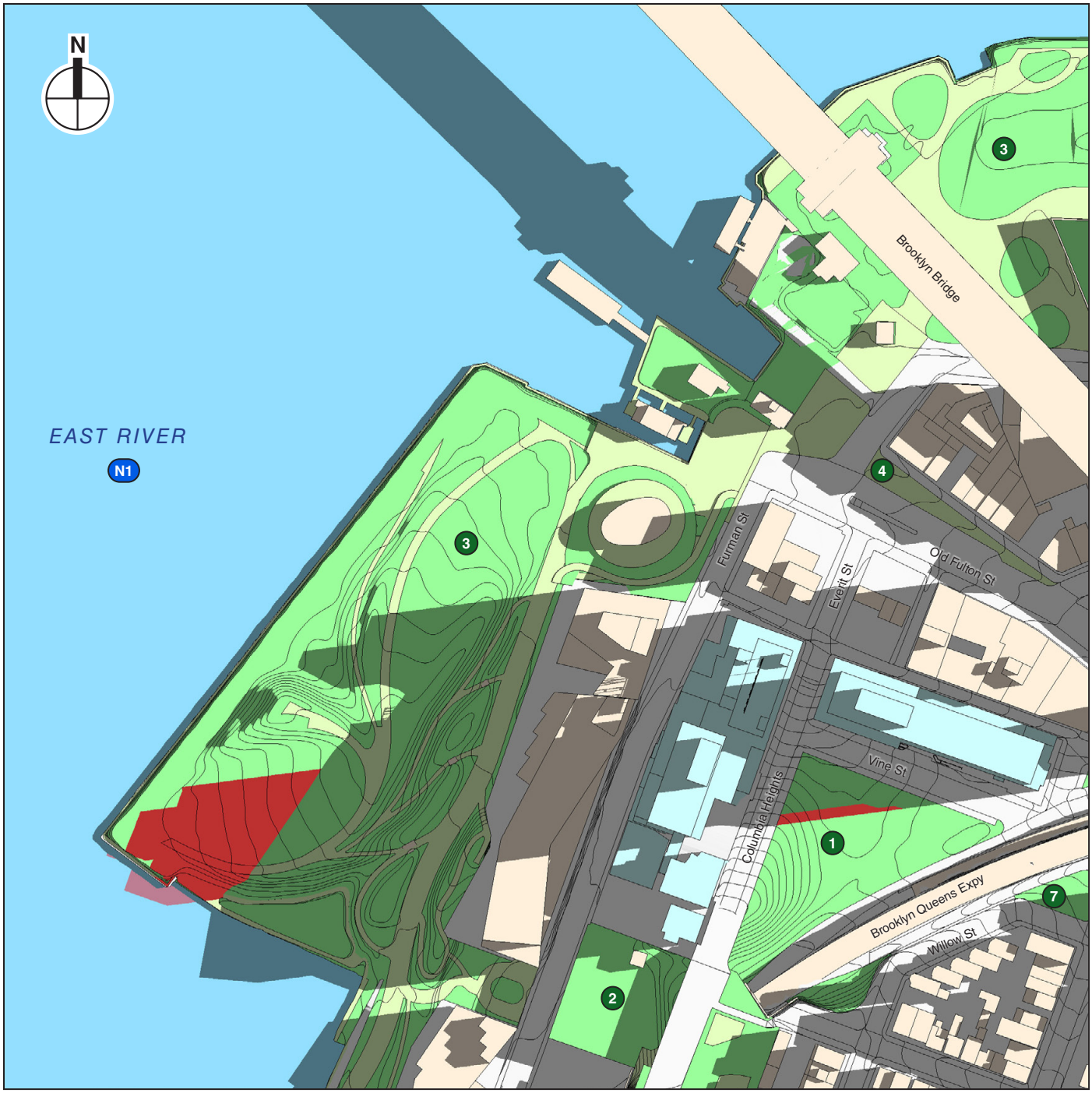
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
March 21 / September 21

COLUMBIA HEIGHTS REZONING

Figure F-29

2.5.26



6:27 AM EST (7:27 AM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

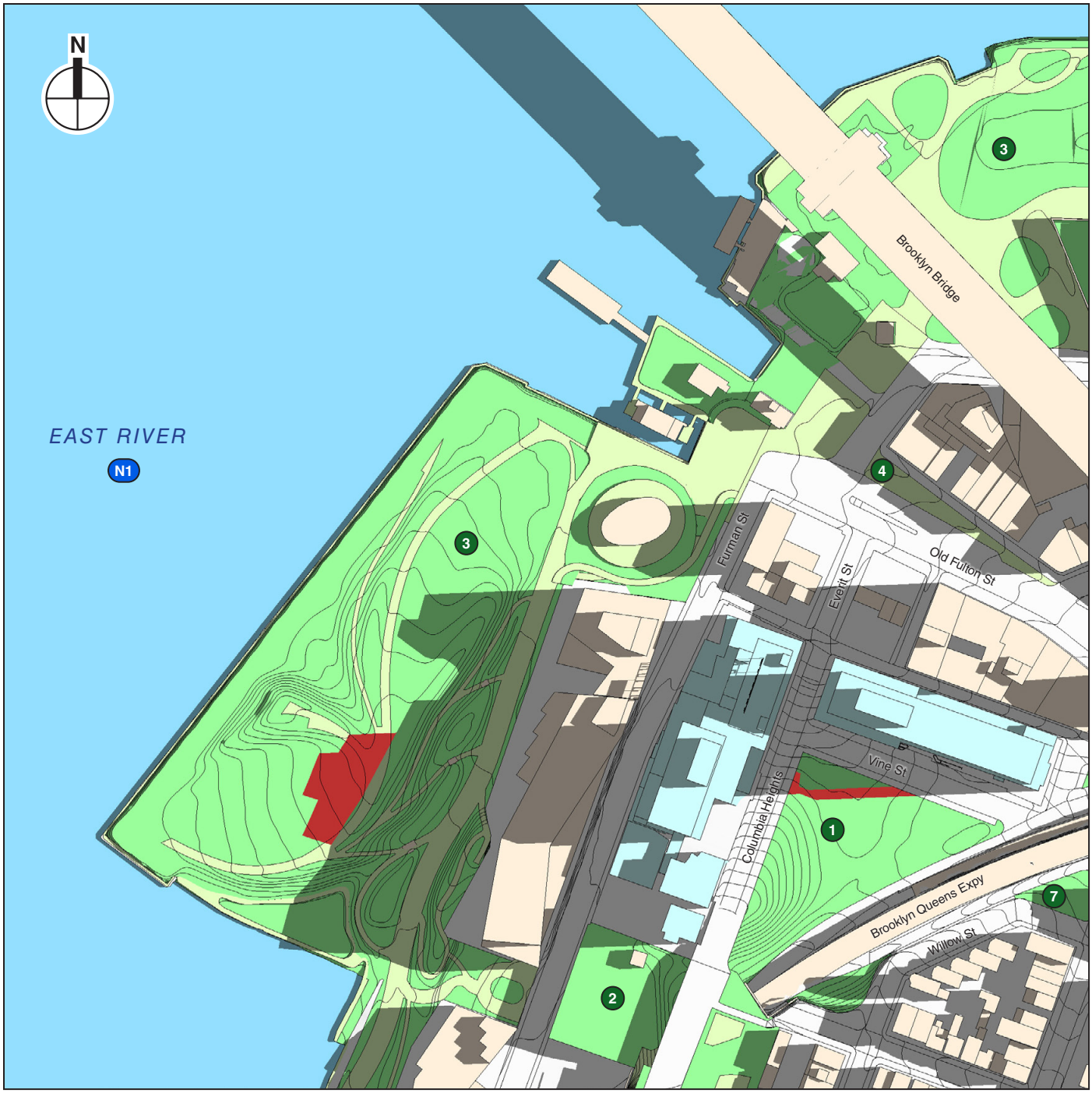
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-30

2.5.26



7:00 AM EST (8:00 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

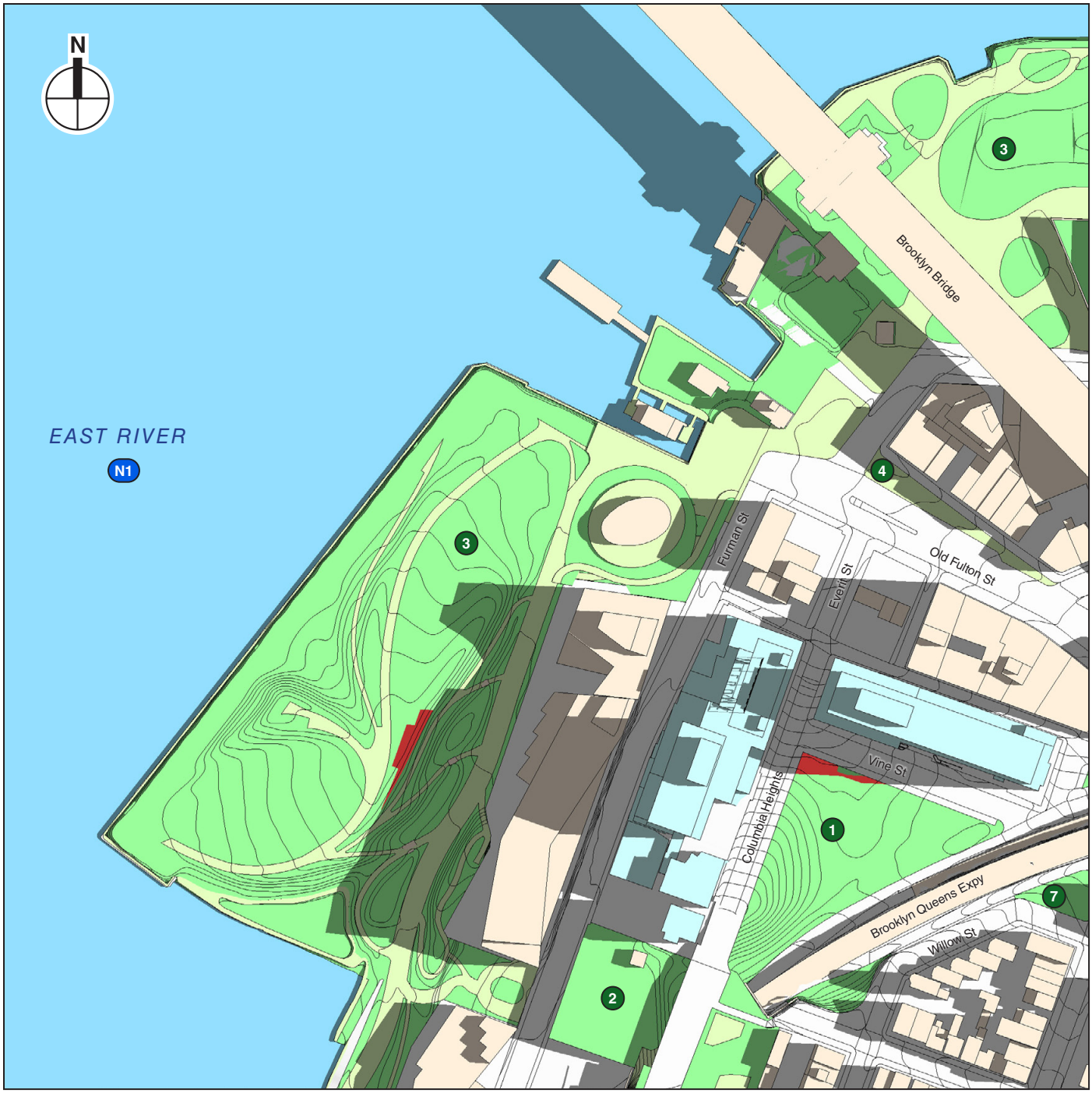
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-31

2.5.26



7:30 AM EST (8:30 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-32

2.5.26



10:00 AM EST (11:00 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

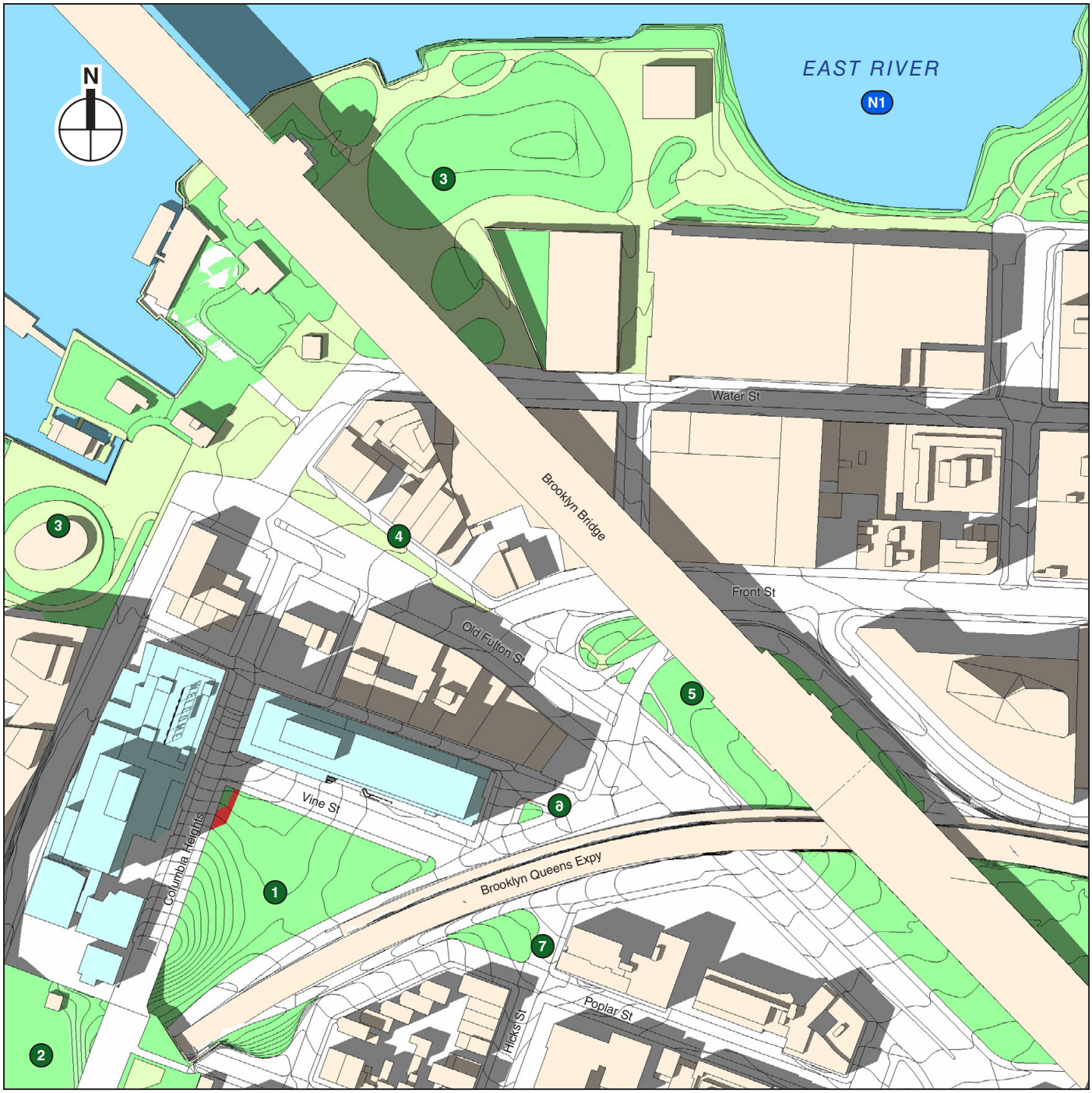
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-33

2.5.26



2:30 PM EST (3:30 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

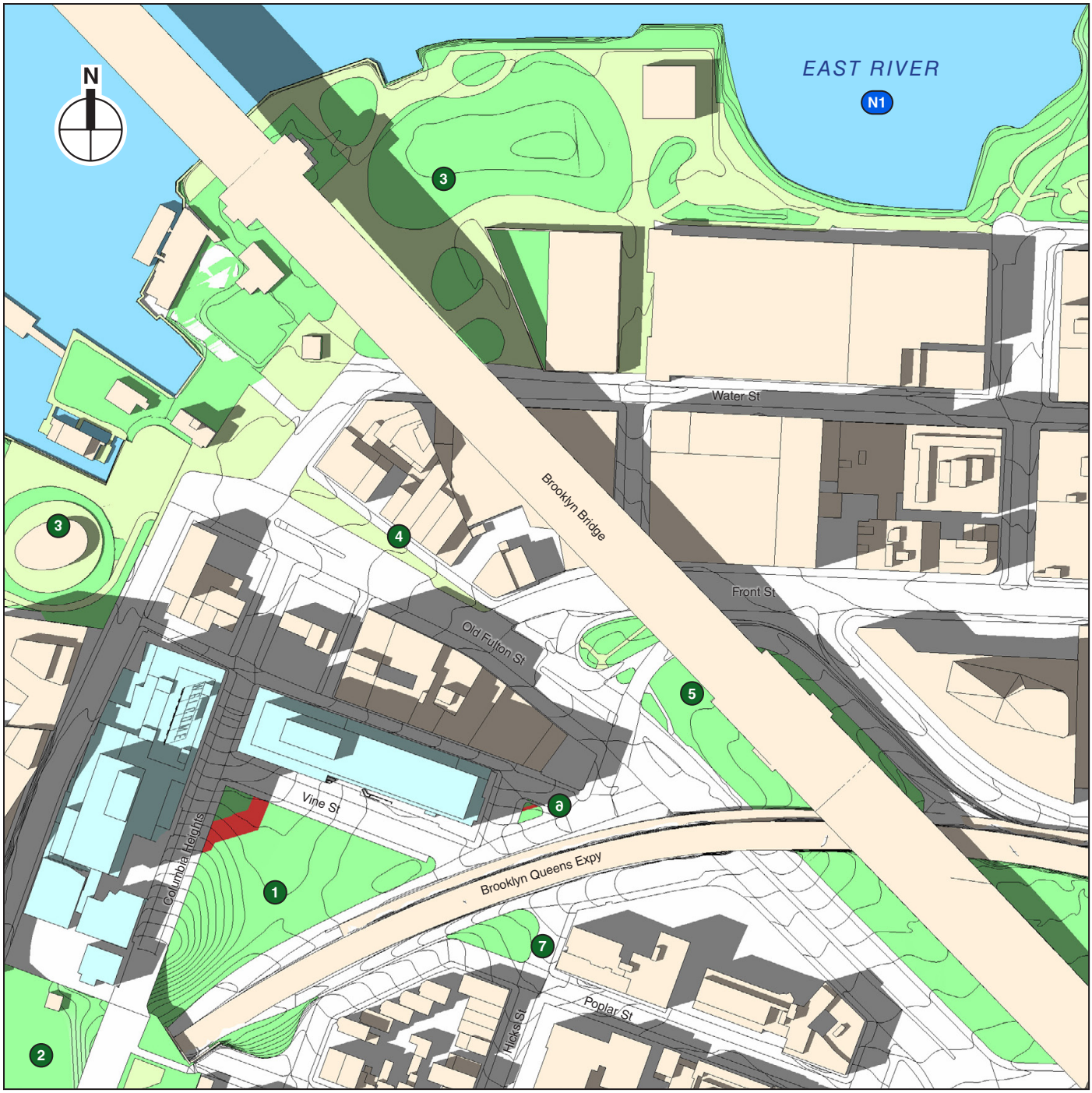
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-34

2.5.26



3:00 PM EST (4:00 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

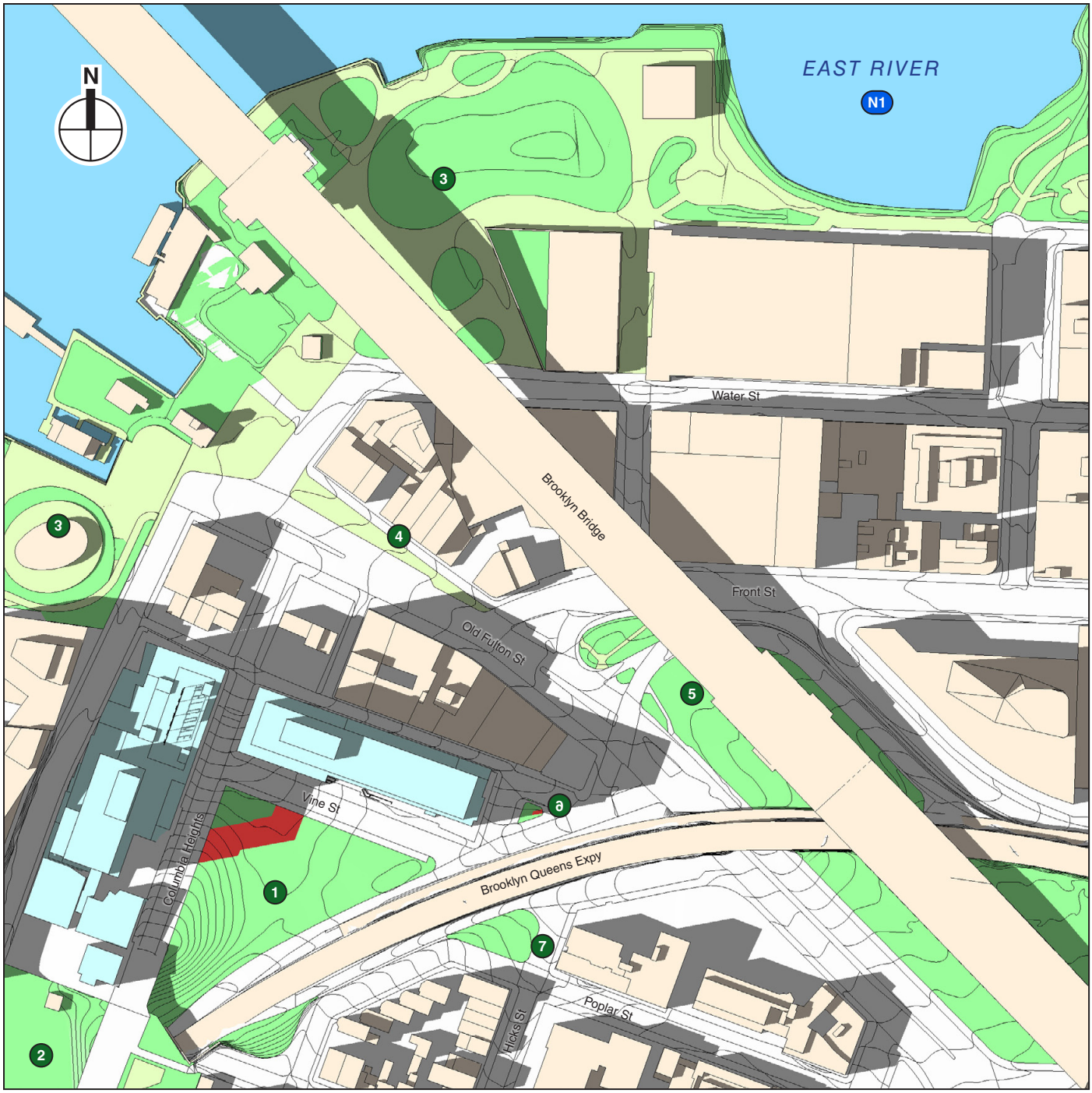
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-35

2.5.26



3:30 PM EST (4:30 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

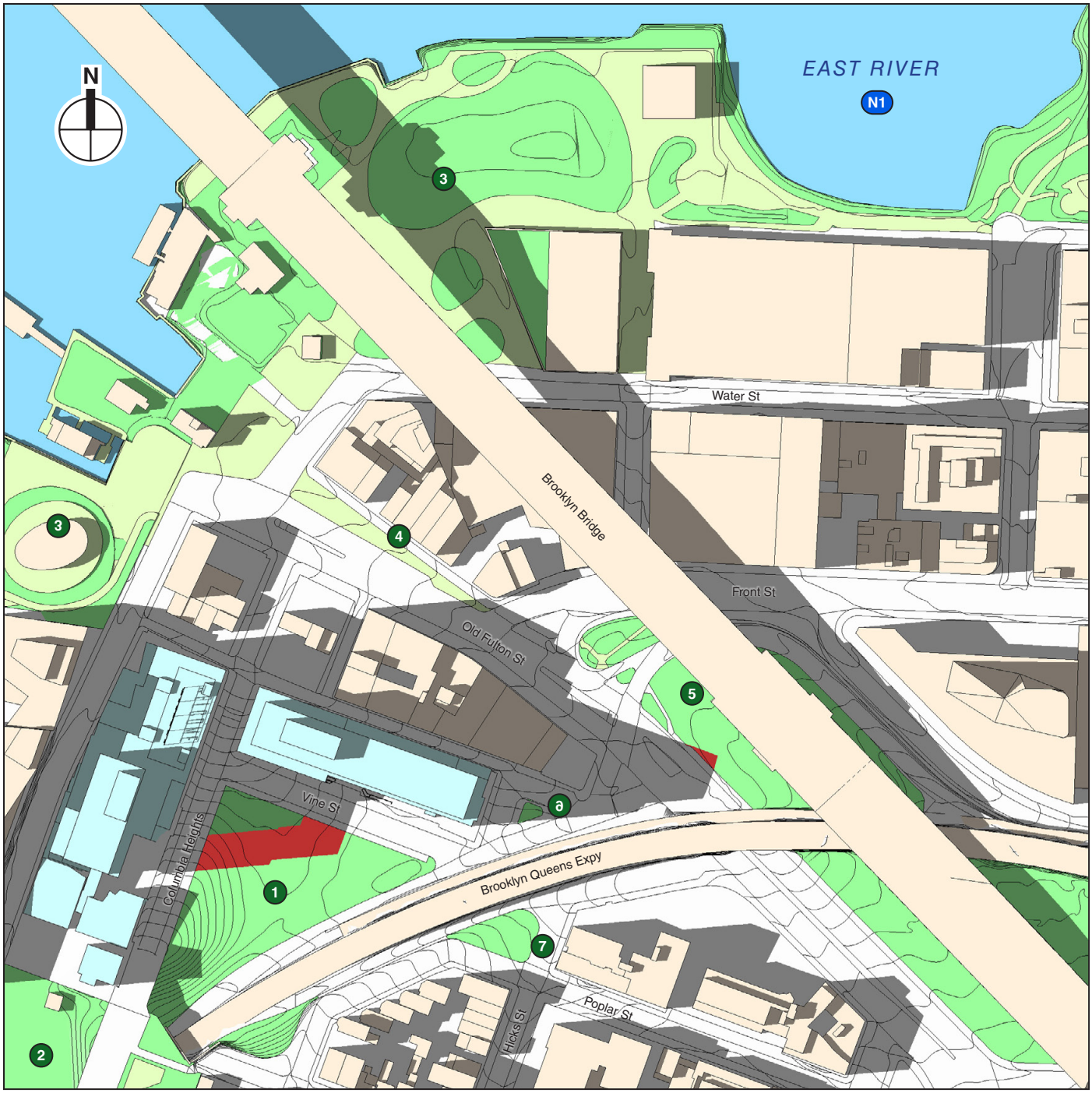
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-36

2.5.26



4:00 PM EST (5:00 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

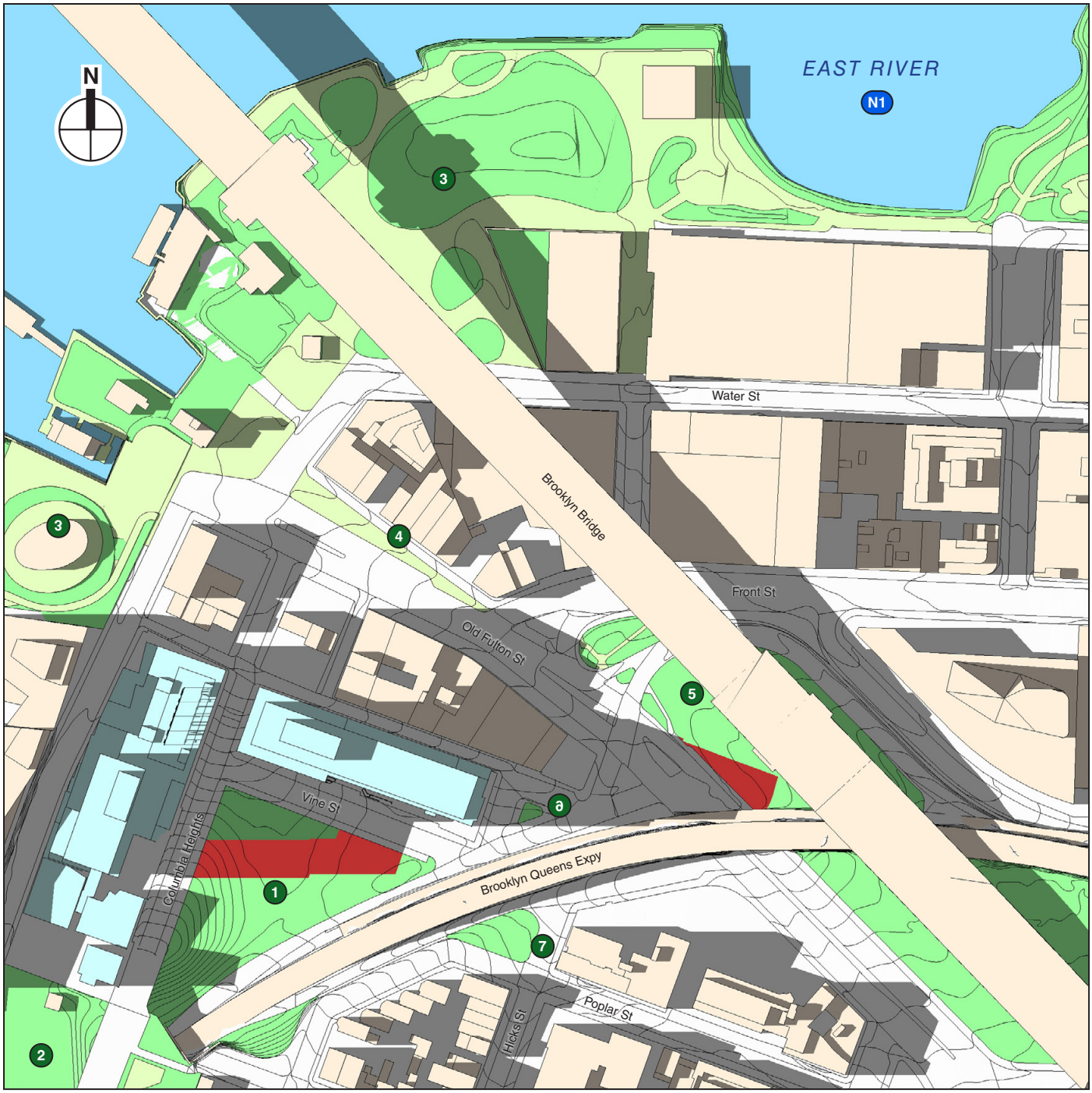
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-37

2.5.26



4:30 PM EST (5:30 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

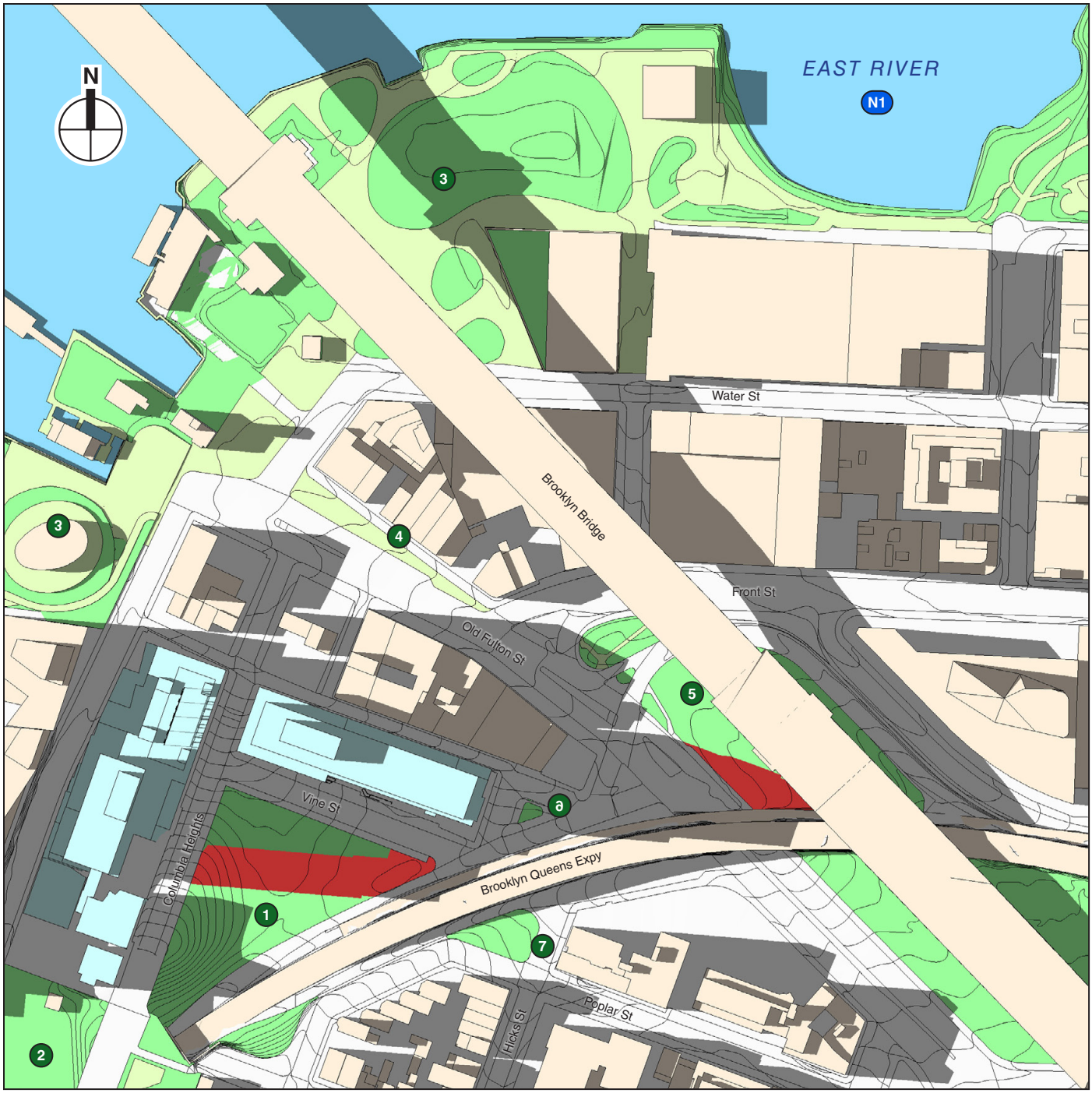
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-38

2.5.26



5:00 PM EST (6:00 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

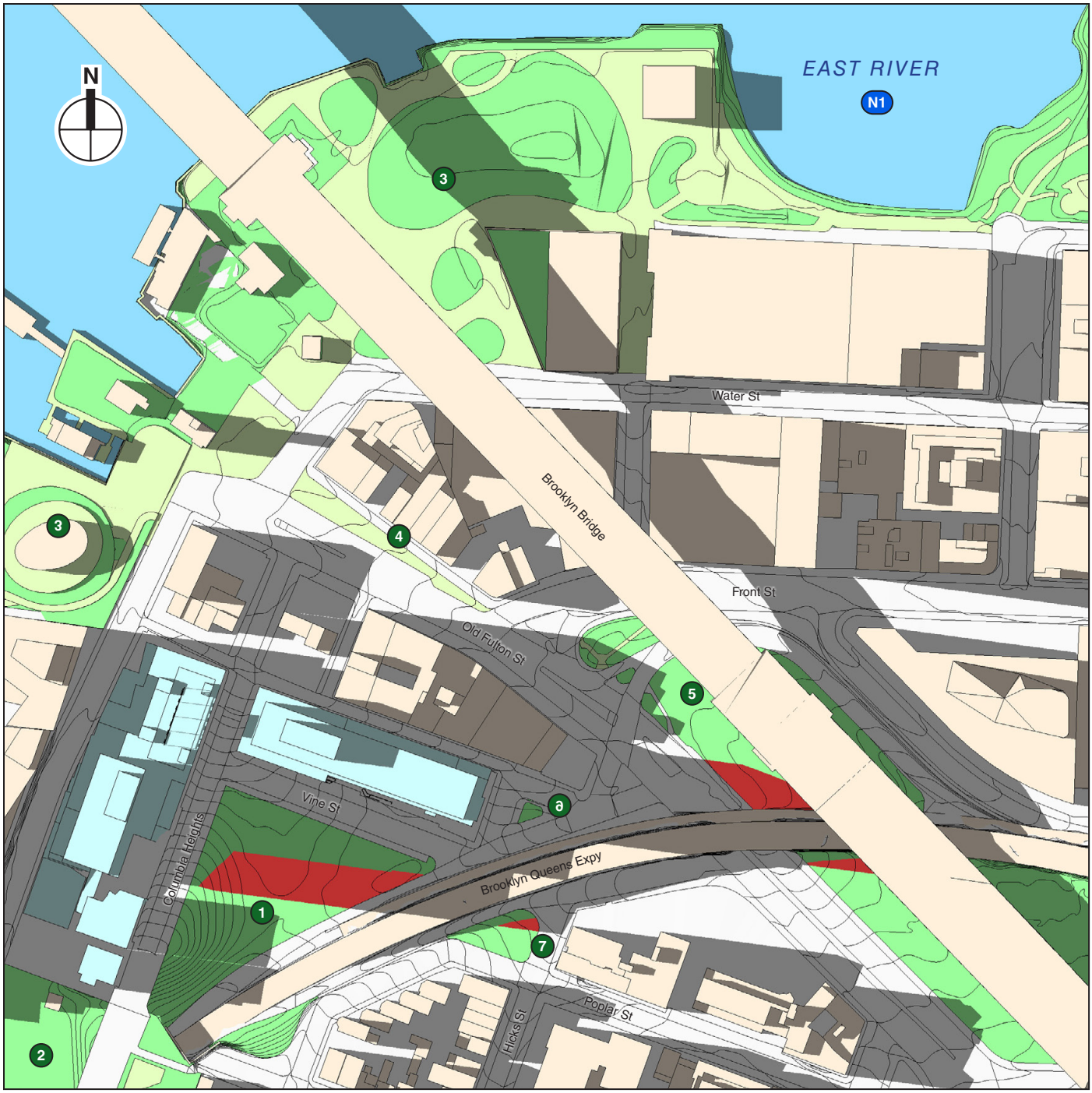
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-39

2.5.26



5:18 PM EST (6:18 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
May 6 / August 6

COLUMBIA HEIGHTS REZONING

Figure F-40

2.5.26



5:57 AM EST (6:57 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

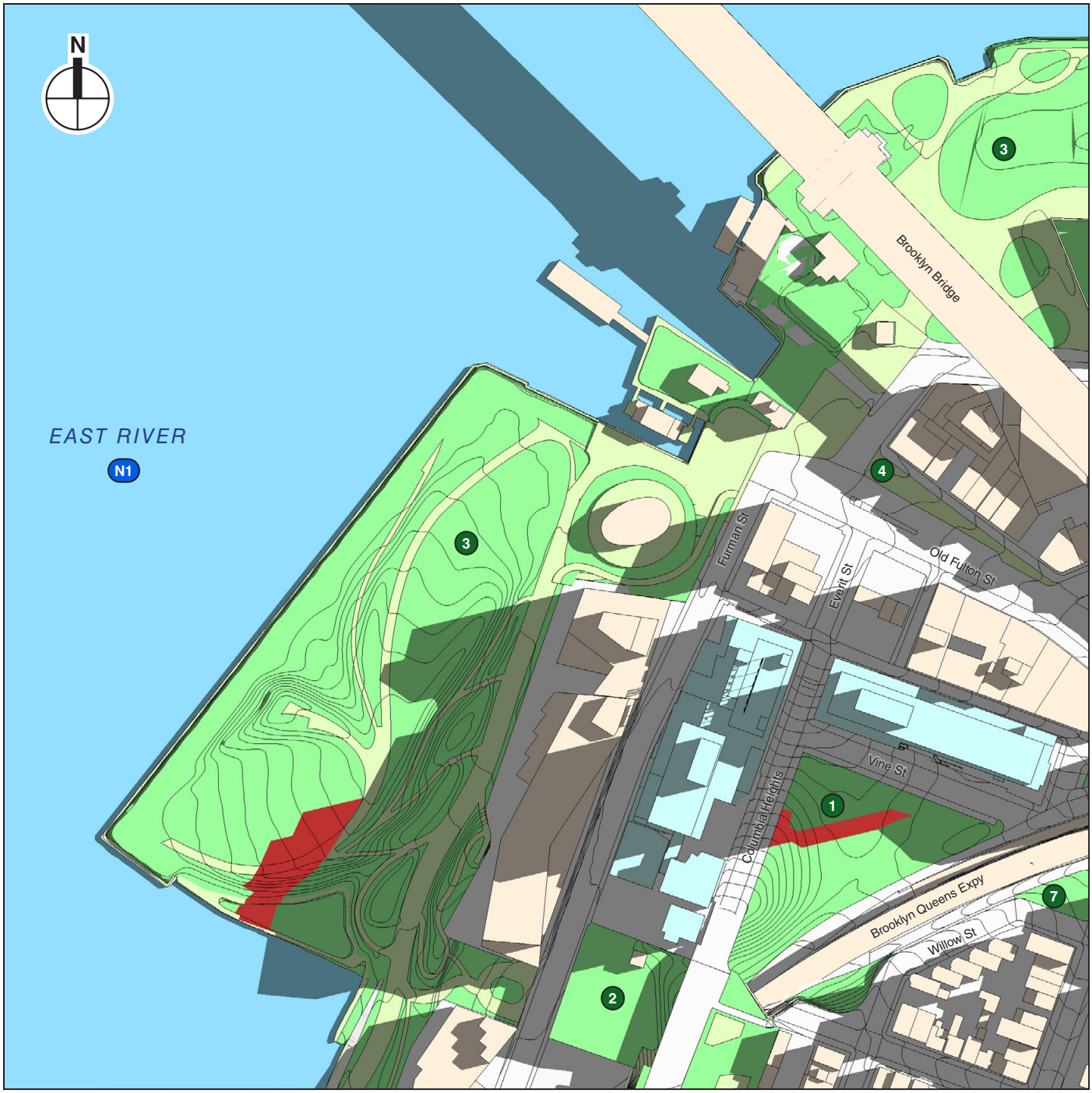
N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21
Figure F-41

COLUMBIA HEIGHTS REZONING

2.5.26



6:30 AM EST (7:30 AM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

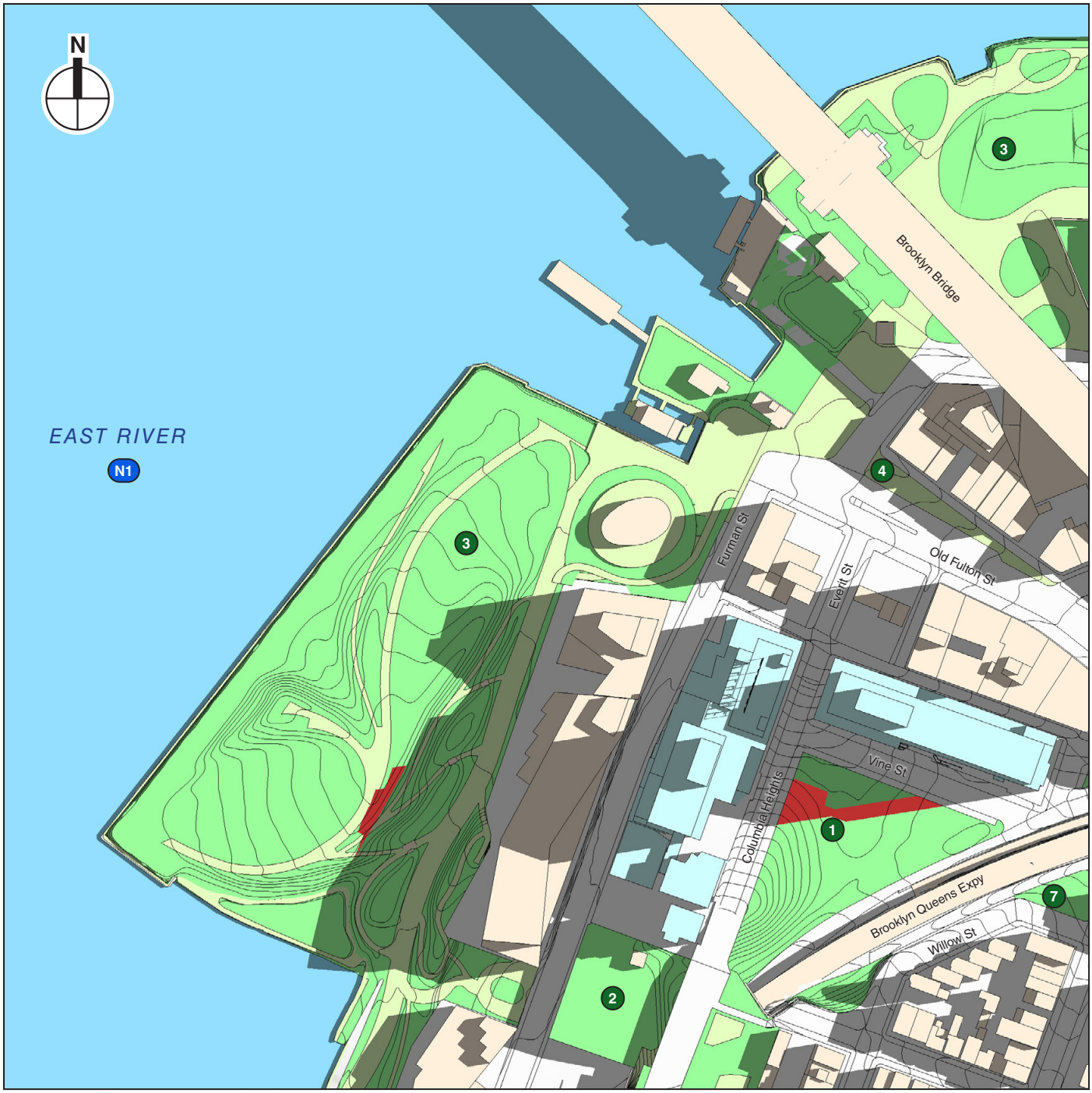
N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21
Figure F-42

COLUMBIA HEIGHTS REZONING

2.5.26



7:00 AM EST (8:00 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21
Figure F-43

COLUMBIA HEIGHTS REZONING

2.5.26



7:30 AM EST (8:30 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

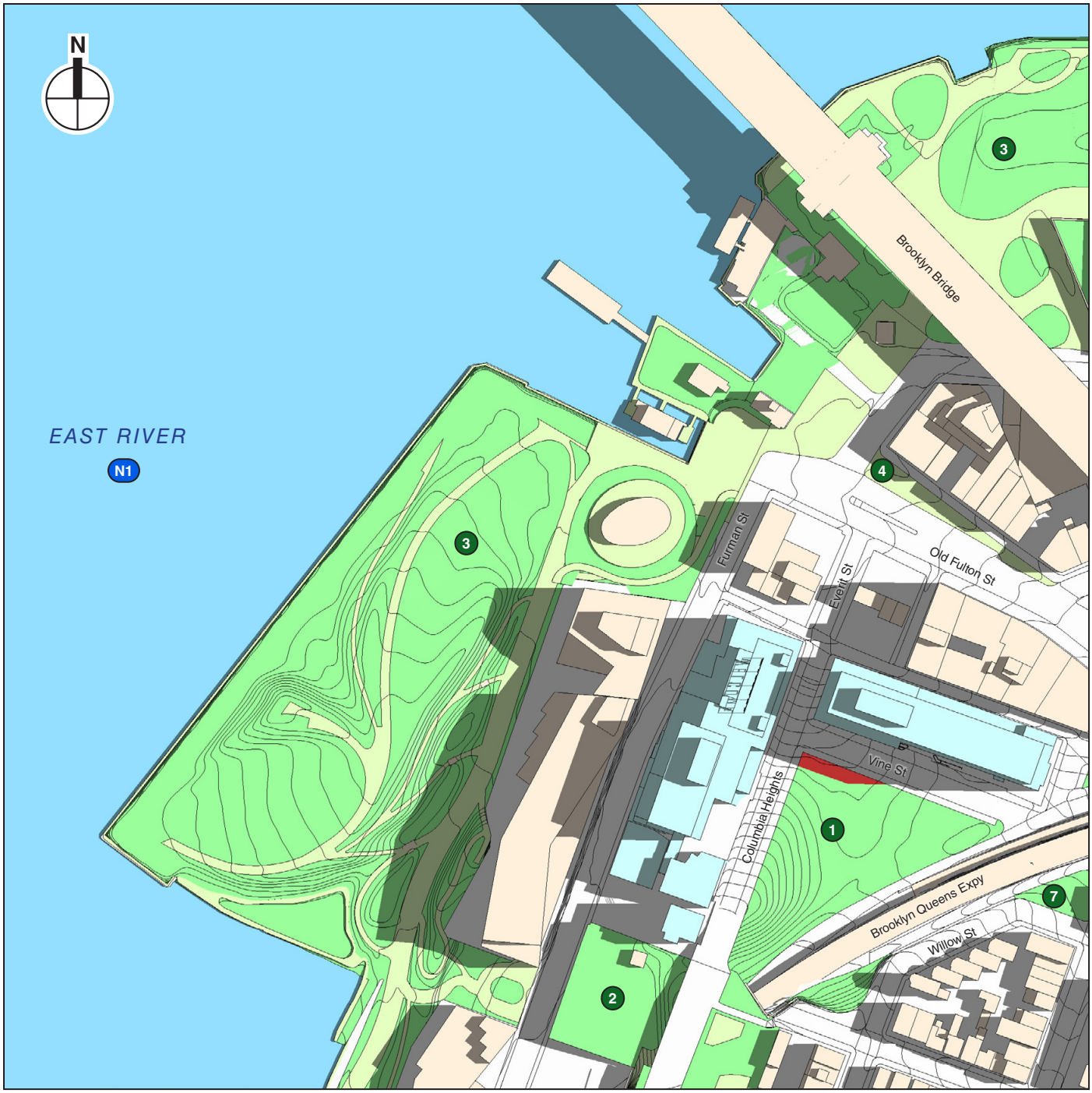
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21

COLUMBIA HEIGHTS REZONING

Figure F-44

2.5.26



8:00 AM EST (9:00 AM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

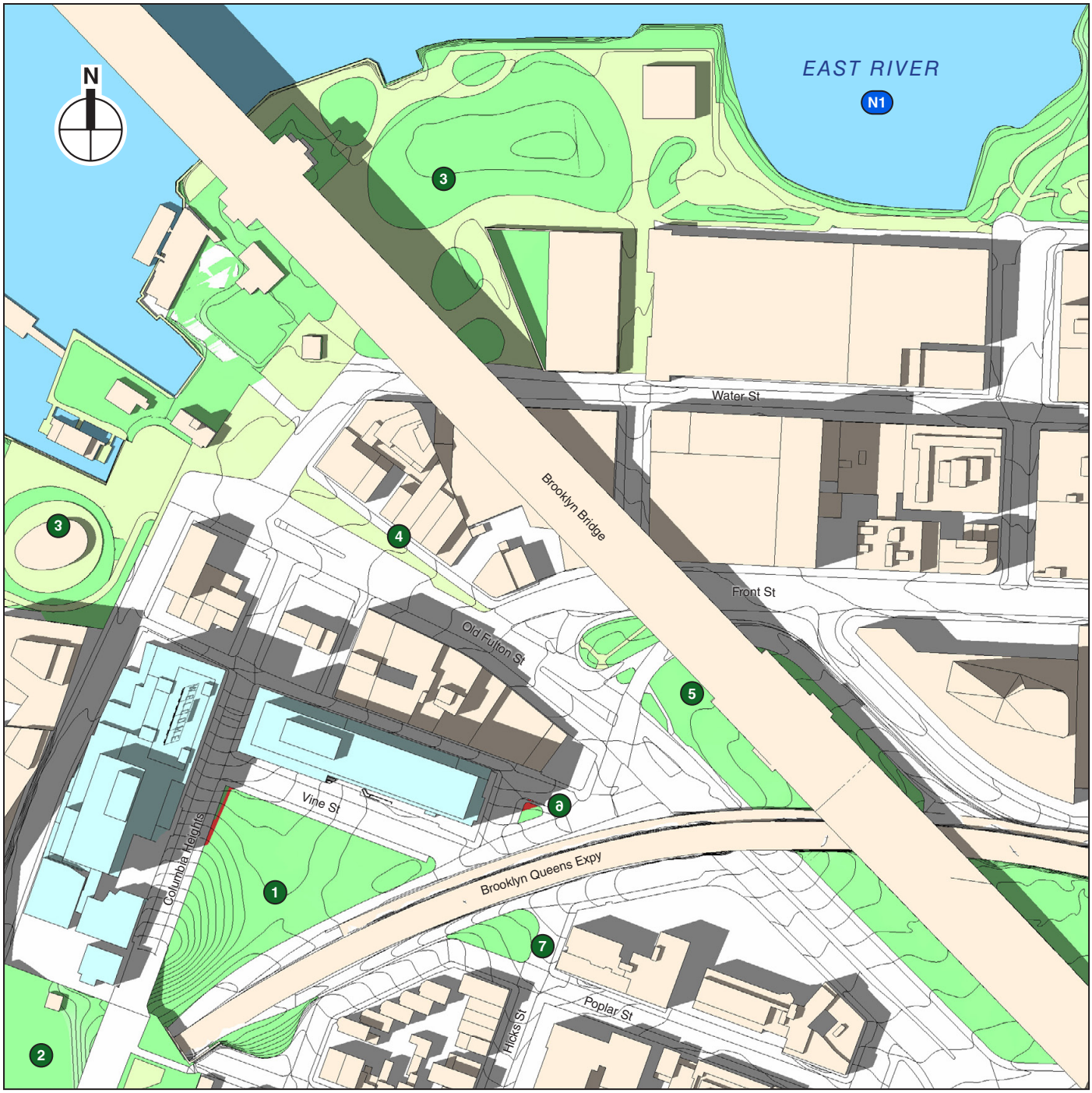
N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21
Figure F-45

COLUMBIA HEIGHTS REZONING

2.5.26



2:30 PM EST (3:30 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

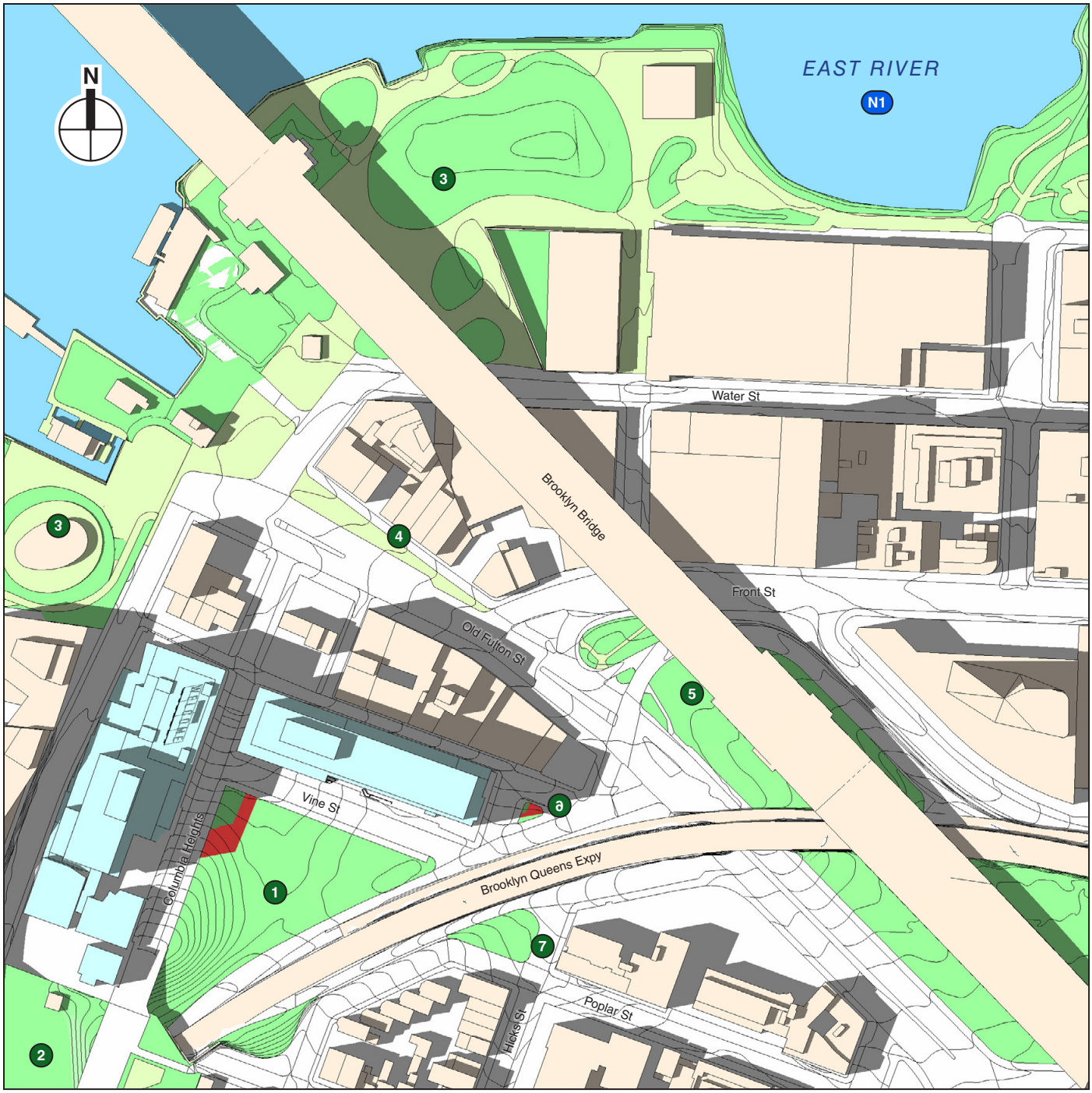
N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21
Figure F-46

COLUMBIA HEIGHTS REZONING

2.5.26



3:00 PM EST (4:00 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

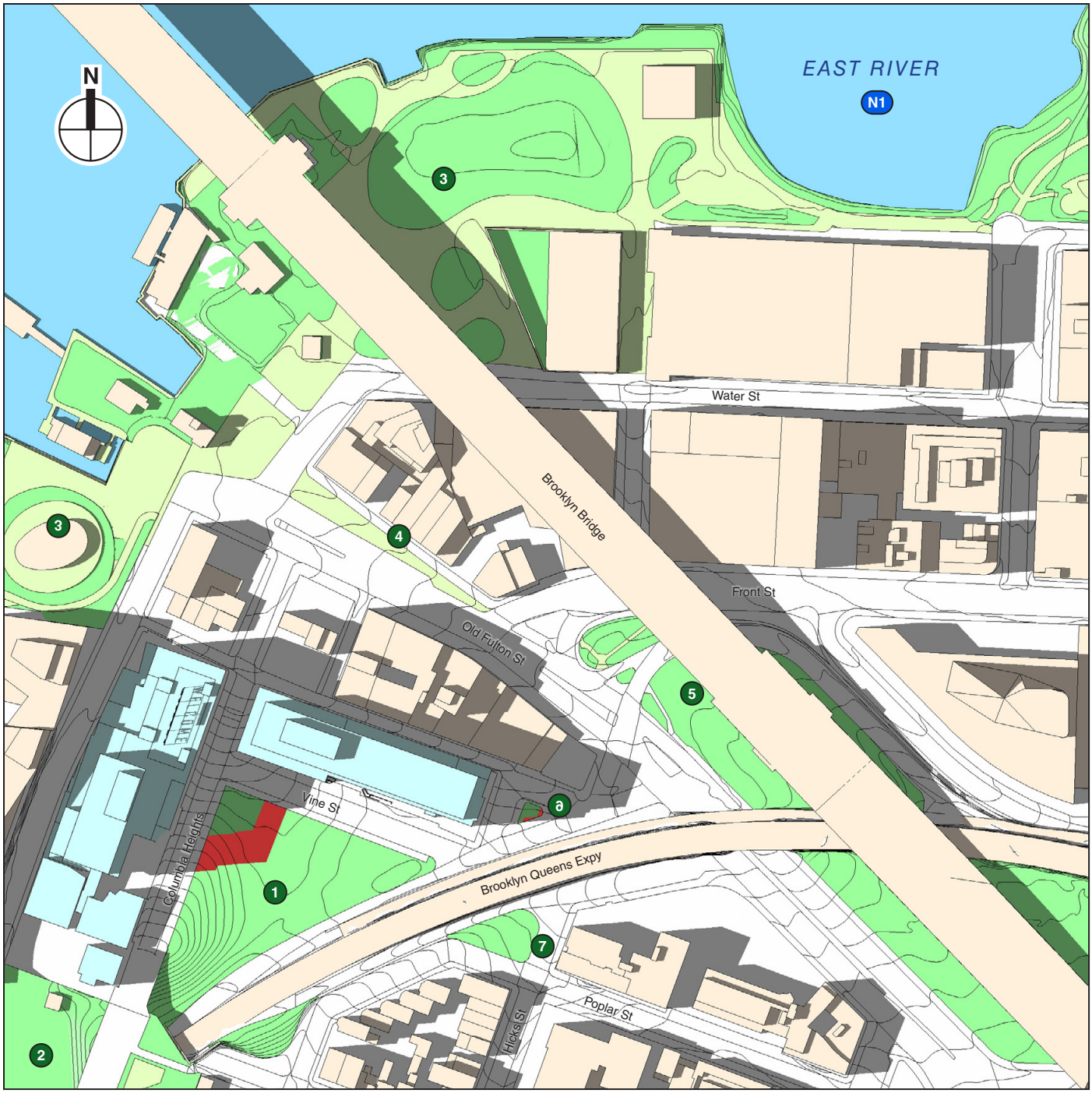
N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21
Figure F-47

COLUMBIA HEIGHTS REZONING

2.5.26



3:30 PM EST (4:30 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

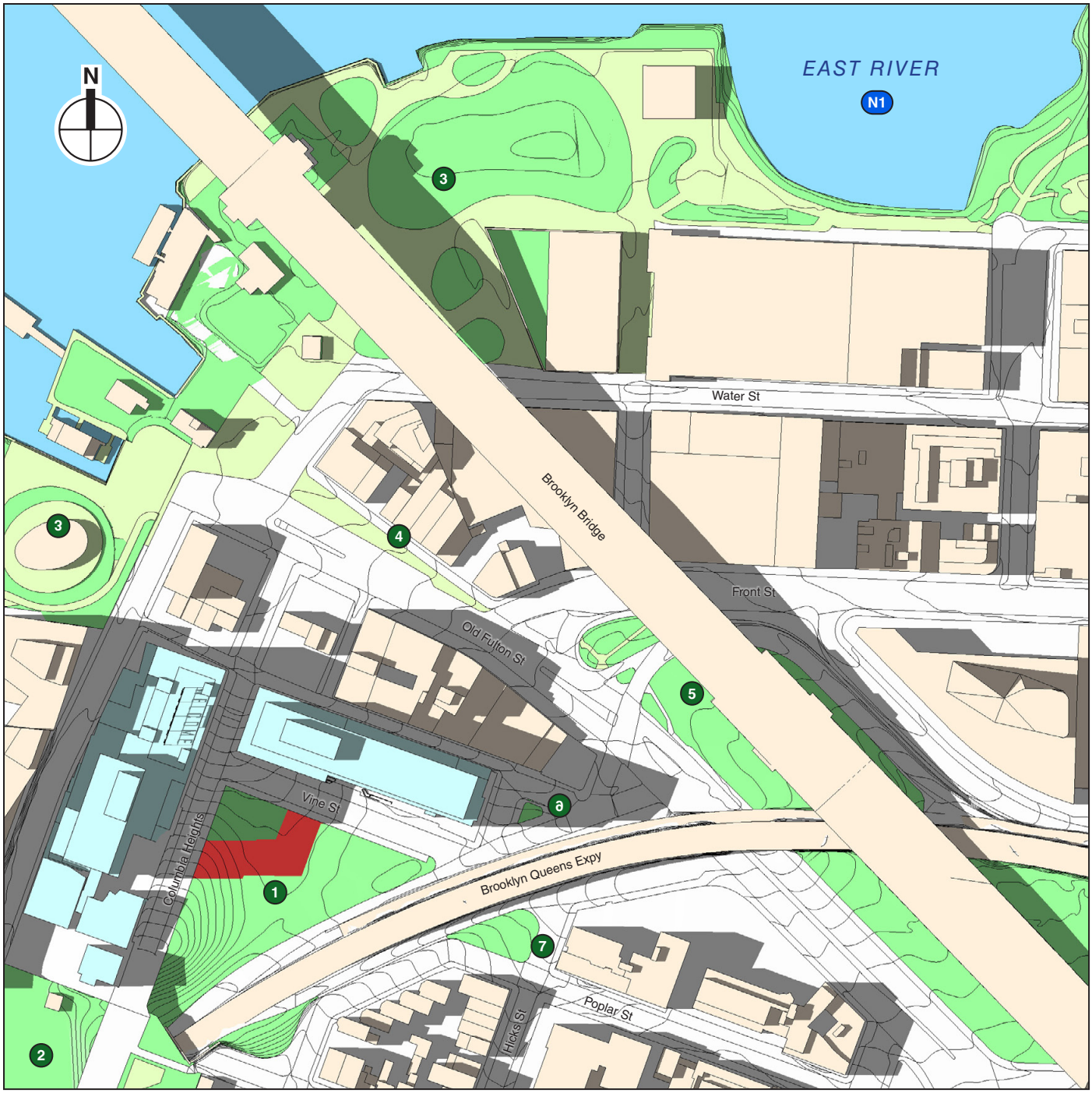
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21

COLUMBIA HEIGHTS REZONING

Figure F-48

2.5.26



4:00 PM EST (5:00 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

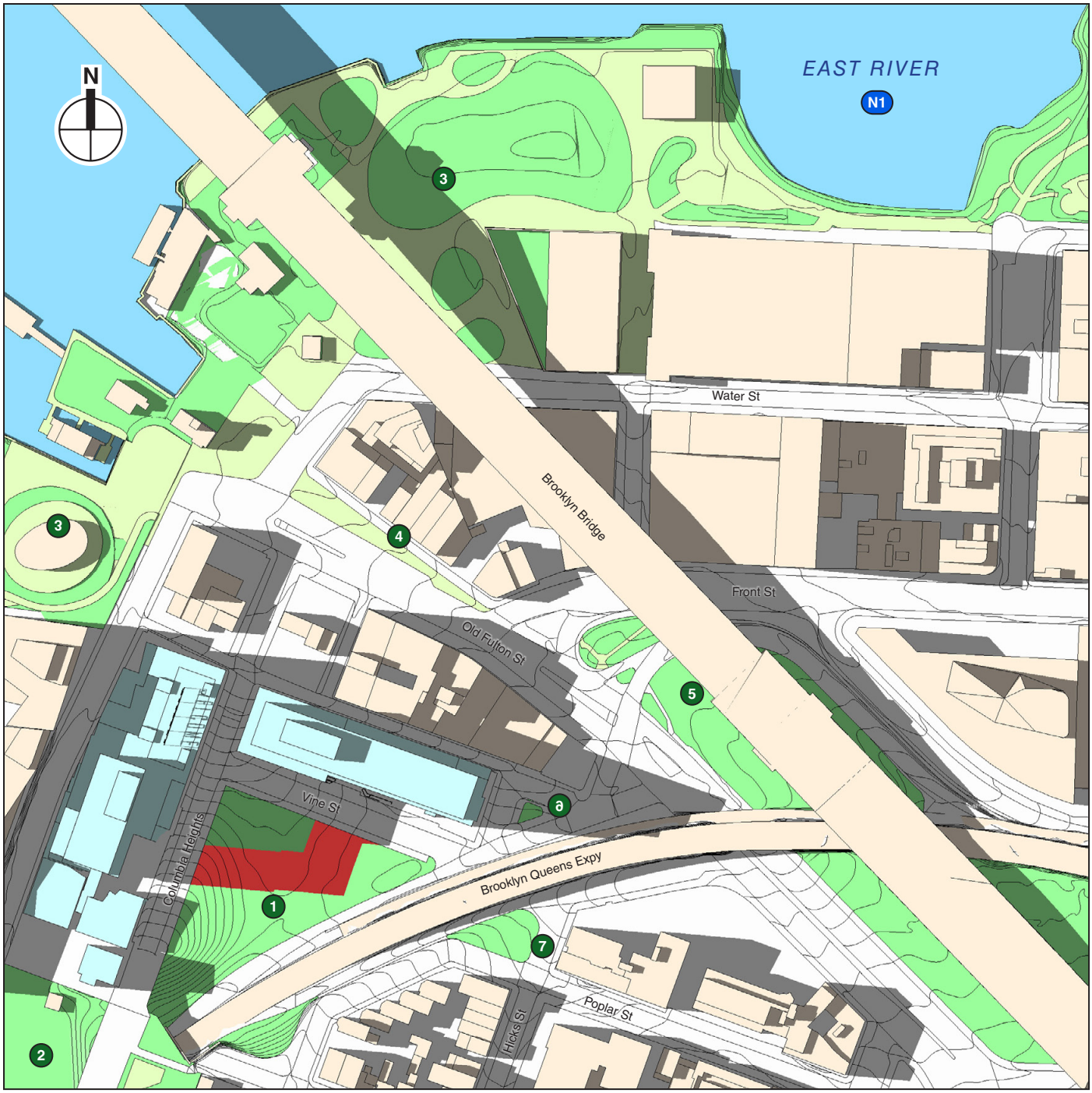
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21

COLUMBIA HEIGHTS REZONING

Figure F-49

2.5.26



4:30 PM EST (5:30 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

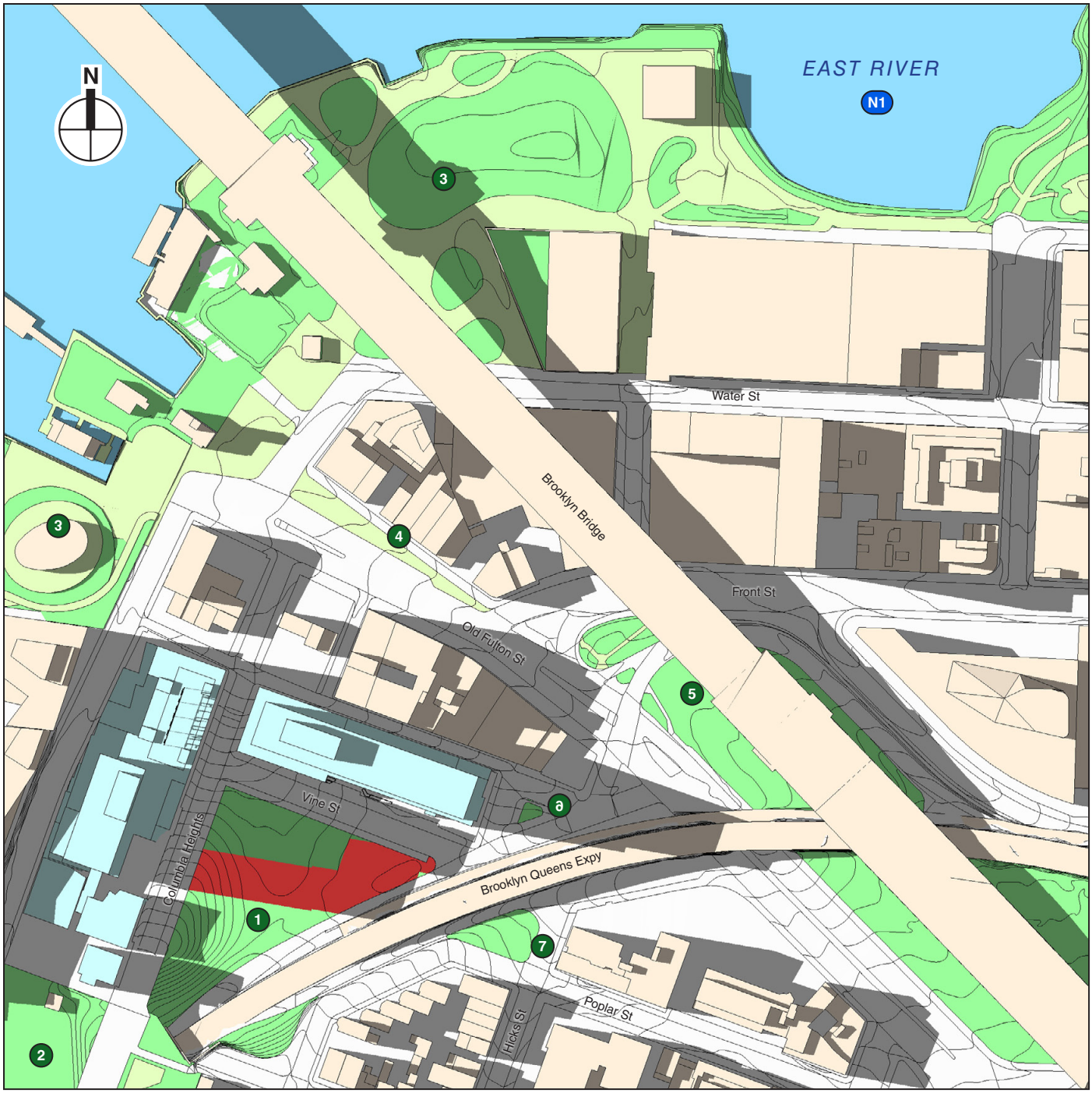
NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21

COLUMBIA HEIGHTS REZONING

Figure F-50

2.5.26



5:00 PM EST (6:00 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

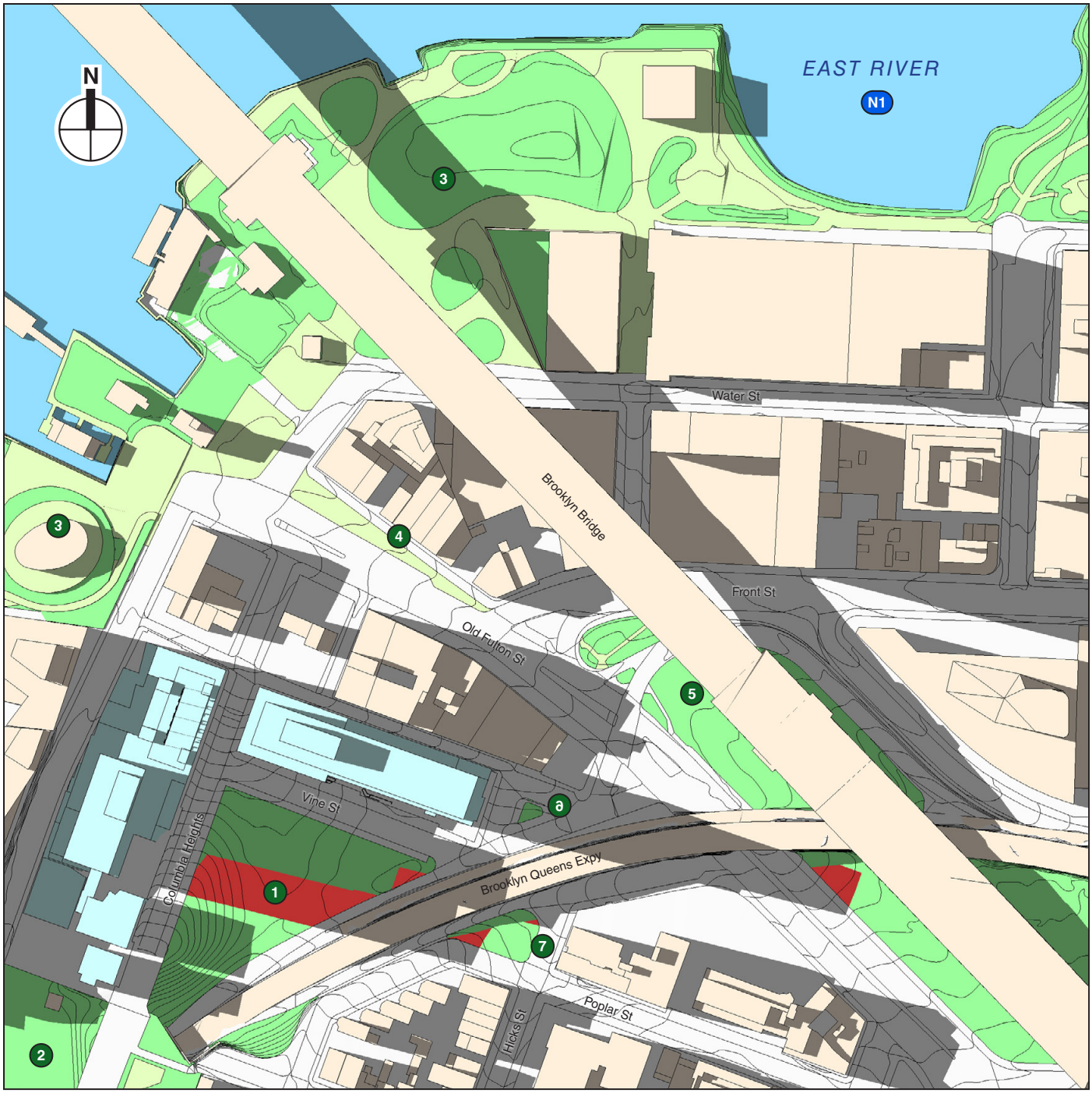
N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21
Figure F-51

COLUMBIA HEIGHTS REZONING

2.5.26



5:30 PM EST (6:30 PM EDT)

RWCDS Massing

Incremental Shadow

Publicly Accessible Open Space

Natural Resource

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21

COLUMBIA HEIGHTS REZONING

Figure F-52

2.5.26



6:01 PM EST (7:01 PM EDT)

RWCDS Massing

Incremental Shadow

\# *Publicly Accessible Open Space*

N# *Natural Resource*

Map Key Open Space Resource

1. Hillside Dog Park
2. Squibb Park
3. Brooklyn Bridge Park
4. Old Fulton Plaza
5. Anchorage Plaza
6. Greenstreets triangle, Doughty and McKenny Streets
7. Poplar Street Community Garden

Map Key Natural Resource

N1. East River

NOTES: Only the areas of shadow highlighted in red represent incremental shadow resulting from the RWCDS Massing. All other shadow is future No Action shadow, i.e. baseline shadow from existing and future No Action buildings.
EST = Eastern Standard Time. EDT = Eastern Daylight Time.

Detailed Analysis
June 21

COLUMBIA HEIGHTS REZONING

Figure F-53

Figures F-41 to F-53 show the June 21 analysis date. Figures are presented in chronological sequence.

Table F-2
Incremental Shadow Durations

Map Reference	Name	Dec. 21	Mar. 21 / Sept. 21	May 6 / Aug. 6	June 21
Publicly Accessible Open Spaces					
1	Hillside Dog Park	—	2:45pm to 4:29pm Total 1 hr 44 min	6:27am to 7:50am 2:20pm to 5:18pm Total 3 hr 21 min	5:57am to 8:10am 2:30pm to 6:01pm Total 5 hr 44 min
3	Brooklyn Bridge Park	8:51am to 2:53pm Total 6 hr 2 min	7:36am to 11:30am Total 3 hr 54 min	6:27am to 7:40am 9:00am to 10:30am Total 2 hr 43 min	5:57am to 7:10am Total 1 hr 13 min
4	Old Fulton Plaza	10:50am to 12:05pm 12:20pm to 12:55pm 1:20pm to 2:25pm Total 2 hr 55 min	3:50pm to 4:29pm Total 39 min	—	—
5	Anchorage Plaza	2:05pm to 2:53pm Total 45 min	1:55pm to 4:29pm Total 2 hr 34 min	3:50pm to 5:18pm Total 1 hr 28 min	5:15pm to 6:01pm Total 46 min
6	Greenstreets triangle, Doughty and McKenny Streets	—	—	2:40pm to 3:45pm Total 1 hr 5 min	2:15pm to 3:40pm Total 1 hr 25 min
7	Poplar Street Community Garden	—	—	5:10pm to 5:18pm Total 8 min	5:15pm to 6:01pm Total 46 min
Natural Resources					
N1	East River	8:51am to 12:15pm Total 3 hr 24 min	7:36am to 8:00am Total 24 min	6:27am to 6:30am Total 3 min	5:57am to 6:25am 28 min

Notes: Table indicates entry and exit times and total duration of incremental shadow for each sunlight-sensitive resource.
Daylight saving time is not used—times are Eastern Standard Time, per *CEQR Technical Manual* guidelines. However, as Eastern Daylight Time is in effect for the March/September, May/August, and June analysis periods, add one hour to the given times to determine actual clock time.

C. ASSESSMENT OF SHADOW IMPACTS BY RESOURCE

The following section briefly describes each affected resource that would receive more than 10 minutes of incremental shadow;[1] its sunlight sensitivity; and the extent, duration, and potential effects of incremental shadow. Descriptions of resource condition and utilization rates were taken from Attachment E, “Open Space.” Map reference numbers are included with the name, for convenience.

Times are given in Eastern Standard Time (EST) in all seasons, as mandated by the *CEQR Technical Manual*, but Eastern Daylight Time (EDT) is in effect for all representative analysis days except for December 21, and times are also provided parenthetically in EDT when relevant, for informational purposes.

[1] Per *CEQR Technical Manual* guidelines, incremental shadow is not considered significant when its duration is no more than 10 minutes and the resource otherwise continues to receive substantial sunlight. *CEQR Technical Manual*, 2025 edition, page 8-28.

OPEN SPACE RESOURCES

Hillside Dog Park (#1)

Hillside Dog Park is a large, triangular, sloping space bounded by Columbia Heights, Vine Street, and the Brooklyn-Queens Expressway (BQE). The park is fully fenced around the perimeter and comprises a large central open area of primarily dirt with some sparse grass or other herbaceous plants, and fallen leaves in certain seasons, surrounded by a mix of young and mature trees, giving the space a somewhat secluded feel despite the expressway and cityscape around it. A number of benches and picnic tables are scattered under the perimeter tree canopy for use by the dog owners, and there is a water fountain in operation in the warmer months. The park's condition and utilization were characterized as fair and moderate, respectively.

Incremental shadow would not fall on the park on the December 21 analysis date representing winter.

On the fall and early spring analysis dates represented by March 21/September 21, the park would be entirely in sun from 90 minutes after sunrise throughout the morning and early and mid-afternoon, until 3:00 PM (4:00 PM EDT) when incremental shadow from the Projected Development Site 2 RWCDS massing would move onto the northwestern corner of the triangular park, followed shortly thereafter by other existing shadows moving onto the park along western edges (see **Figure F-26**). The increment would move gradually eastward, along with the other existing shadows, over the remaining hour and a half of the analysis period (see **Figures F-27 to F-29**). The increment would remain small in size throughout, compared to the remaining sunlit area and the other shadows from existing buildings (including the buildings on the Development Site) and the higher elevations to the south above where the expressway passes under Columbia Heights.

Given the small size of the shadow increment throughout its limited duration, and the remaining available sunlit areas during the affected period and throughout the day prior, the increment would not cause a significant adverse impact to the use of the park on this representative date. With regard to the trees and vegetation, the analysis concluded that all areas of the park affected by the increment would receive seven or more hours of sun over the course of the day, ample for even full-sun-loving species, and therefore the increment would not cause a significant adverse impact to the park's vegetation.

On the May 6/August 6 analysis dates, representing an additional date during the growing season, a narrow band of incremental shadow from the eastern end of the Projected Development Site 1 RWCDS massing would join a larger, pre-existing area of shadow on the northwestern corner of the park early in the morning, with the increment lasting for about an hour and 20 minutes (see **Figures F-30 to F-32**). The increment would exit at 7:50 AM (8:50 AM EDT). Most of the park would remain in sun throughout this affected period, and the increment would be small even relative to the other existing shadows. The park would be entirely in sun for the next six and a half hours, 7:50 AM to 2:20 PM (8:50 AM to 3:20 PM EDT), after which incremental shadow from the Projected Development Site 2 RWCDS massing would enter the park's northwestern corner (see **Figure F-34**). The increment would gradually extend eastward and shift southward over the remaining three hours of the analysis period, remaining small relative to the overall size of the park and the other pre-existing shadows (see **Figures F-35 to F-40**). Substantial areas of the park would remain in sun until nearly the end of the analysis period at 5:18 PM (6:18 PM EDT), as shown in the figures. Even at 5:00 PM (6:00 PM EDT), nearly half the park would be in sun, with the increment covering only roughly a quarter of the space.

Given the limited size of the increment throughout the affected period (early morning and late afternoon) and the continued availability of substantial sunlit areas during these times, the increment would not cause a significant adverse impact to the use of the park on this representative date. With regard to the trees and vegetation, the analysis concluded that all areas of the park affected by the increment would receive six or more hours of sun over the course of the day (with most affected areas receiving eight hours or more), and therefore the increment would not cause a significant adverse impact to any of the park's vegetation.

On June 21, the summer solstice, shadows would follow a similar pattern to those on May 6 and August 6, with incremental and existing shadows falling on the northwestern portion of the park early in the morning, and then in the late afternoon entering from the west and moving across the park, gradually increasing in size until the end of the analysis period. In the early morning, the increment would remain small, no more than approximately 10 percent of the total park area, throughout its 2 hour and 13 minute duration, and large areas of the park would remain in sun throughout this period and especially after 6:30 AM (7:30 AM EDT), as shown on **Figures F-41 to F-45**. The park would be entirely in sun for approximately the next six hours, and then at 2:30 PM (3:30 PM EDT), incremental shadow from the Projected Development Site 2 RWCDS massing would enter the northwestern part of the park (see **Figure F-46**), followed closely by other existing shadows. The increment would gradually extend eastward and shift southward over the course of the remaining three and a half hours (see **Figures F-47 to F-53**). Substantial areas of the park would remain in sun until about 5:00 PM (6:00 PM EDT), and a smaller portion of the park would remain in sun for the final hour of the analysis period until 6:01 PM (7:01 PM EDT). At the moment of its greatest extent, around 5:00 PM (6:00 PM EDT), the increment would cover about 30 percent of the overall park, with about 20 percent in sun and 50 percent in pre-existing shadows.

Given the limited size of the increment throughout the affected period (early morning and late afternoon) and the continued availability of sunlit areas in the park during these times, the increment would not cause a significant adverse impact to the use of the park on this representative date. With regard to the trees and vegetation, the analysis concluded that all areas of the park affected by the increment would receive six or more hours of sun over the course of the day (with most affected areas receiving eight hours or more), and therefore the increment would not cause a significant adverse impact to any of the park's vegetation.

It should also be noted that while the RWCDS massing, representing a full utilization of allowed floor area and maximum height under the proposed zoning, was used to ensure a conservative analysis, the Proposed Development on Projected Development Site 2 would be smaller and thus would cast less incremental shadow than presented in this analysis.

Brooklyn Bridge Park (#3)

Brooklyn Bridge Park spans over 1.3 miles of Brooklyn's waterfront, from Atlantic Avenue in the south to Manhattan Bridge in DUMBO. Popular with tourists as well as New Yorkers, it provides numerous recreational amenities, both passive and active, and views of the Manhattan skyline and New York Harbor. The park's condition and utilization were characterized as excellent and high, respectively. West and northwest of the Development Site, the Pier 1 portion of the park contains large lawns, a playground at the northern edge, a waterfront promenade with scenic views, tree-lined pathways, the water gardens (along the main park promenade), and a salt marsh at the southern end. The Pier 1 Pavilion and Entryway, completed and opened in spring 2025, is located immediately northwest of the Development Site across Furman Street and contains a comfort station, concession kiosks, and a sitting area. North of the Development Site, the Fulton Ferry Landing pier provides views of the Harbor and Manhattan, and concessions. Farther east,

landscaping and a wide bench-lined walk (past the exclusive River Café restaurant and parking lot) connect the Landing to Emily Warren Roebling Plaza under the Brooklyn Bridge. East of Roebling Plaza, to the northeast of the Development Site, is the Empire Fulton Ferry portion of Brooklyn Bridge Park and St. Ann's Warehouse.

On the December 21 analysis date representing winter, incremental shadow would move west to east across portions of Brooklyn Bridge Park throughout the day, generally limited to small patches and slivers falling amongst pre-existing shadows.

During the morning hours (approximately 9:00 AM to noon), small areas of incremental shadow would fall between and adjacent to pre-existing shadows on the northern portion of Pier 1, falling on different areas at different times of the morning moving west to east (see **Figures F-5 to F-11)**. Large areas of sun would remain on Pier 1 and adjacent portions of Brooklyn Bridge Park south and east throughout this period.

Incremental shadow would also fall on portions of Fulton Ferry Landing in the morning and midday hours until around 1:00 PM (see **Figures F-4 to F-12**). During the first hour, until about 10:00 AM, the increment would add to substantial pre-existing shadows to eliminate the remaining areas of sun on the Landing. After 10:00 AM, larger and larger portions of the Landing would be in sun, and after noon it would be mostly or entirely in sun.

From approximately 9:45 AM to noon, a larger incremental shadow from the Projected Development Site 1 RWCDS massing would move across the portion of the park between Fulton Ferry Landing on the west, Emily Warren Roebling Plaza on the east, and Fulton and Water Streets on the south (see **Figures F-6 to F-11**). This area of the park contains a parking area, landscaping and paths associated with access to the River Café restaurant, and a wide walk alongside Fulton and Water Streets serving primarily as pedestrian circulation and a connection between Pier 1 and Fulton Ferry Landing to the west and Emily Warren Roebling Plaza and Empire Fulton Ferry to the east. Smaller patches of incremental shadow from the Projected Development Site 2 RWCDS massing would fall on portions of this area from approximately 12:45 PM to 2:00 PM.

In the afternoon, beginning at approximately 12:45 PM, small patches of incremental shadow would move intermittently (in and around pre-existing shadows) through Emily Warren Roebling Plaza and a portion of Empire Fulton Ferry between Roebling Plaza and St. Ann's Warehouse (see **Figures F-12 to F-16**). Sunlight would continue to reach large areas of these spaces during this period.

The analysis concluded that the incremental shadow would not cause significant adverse impacts to the recreational use of Brooklyn Bridge Park in winter because for the most part, the increment would be limited to patches and slivers mixed in with larger pre-existing shadows, while other portions of the park adjacent to and nearby the affected areas would continue to be in sun for users seeking it. Furthermore, usage of these waterfront spaces during the winter months is generally lighter than in other seasons due to the cold weather. With regard to Fulton Ferry Landing, during the first hour of the analysis period until about 10:00 AM, when the incremental shadow would eliminate the remaining sun, large sections of nearby waterfront locations in Pier 1 and Empire Fulton Ferry would be in sun for users seeking the same or similar views of Manhattan, the Bridges, and the Harbor. With regard to the larger incremental shadows on the portion of the park near the River Café during the late morning, as noted above, this area is primarily a pedestrian thoroughfare and connector, a parking area, and access to the River Café,

a private restaurant, and therefore minimally sensitive to shadows. Recreational users would have ample sunlit space to utilize in nearby areas of the park.

On the rest of the representative dates, incremental shadows would be limited to Pier 1.

On the March 21/September 21 analysis date representing the early spring and the fall, and the shoulders of the City's growing season, incremental shadow would move generally west to east through the middle of Pier 1 during the first two hours of the analysis period (7:36 AM to 9:30 AM [8:36 AM to 10:30 AM EDT]), as shown on **Figures F-17 to F-21**. This increment would be larger during the first hour, albeit still small relative to the overall expanse of Pier 1, and would become small during the second hour. Then, a small increment would continue to move through a portion of the Pier 1 Pavilion and Entryway area for the ensuing two hours, exiting at 11:30 AM (12:30 PM EDT), as shown on **Figures F-19 to F-23**. This increment would be very small throughout, with the vast majority of Pavilion and Entryway area and Fulton Ferry Landing in sun during this period. It should be noted that the increment would not fall far enough to the south to reach the salt marsh at the southern end of Pier 1 on the March 21 and September 21 representative date.

Given the limited extent and transient nature of the increment, falling on different locations as it moved, and more importantly, the continued availability of large sunlit areas all around and nearby the increment, particularly in the mid to late mornings when usage would likely be heavier, the analysis concluded that the incremental shadow would not cause a significant adverse impact to the recreational use of Brooklyn Bridge Park on this representative date. With regard to vegetation, all affected areas of Pier 1 would continue to receive direct sunlight for six or more hours due to the lack of structures to the south and west, except for a very small area in a portion of the Pier 1 Pavilion and Entryway area. This small area would receive four to five hours of sun (due mostly to pre-existing shadows from the 1 Hotel and other buildings rather than incremental shadow), sufficient for shade tolerant species but potentially not for full-sun-loving species, which generally need six or more hours. However, as noted below, this small area would receive six or more hours of direct sun during the heart of the City's growing season, May through August. Additionally, aside from this small patch of the park, the vast majority of Pier 1 and Brooklyn Bridge Park generally would continue to receive over six hours of direct sun. Therefore, the analysis concluded that the incremental shadow would not cause a significant adverse impact to Brooklyn Bridge Park's vegetation.

On the May 6/August 6 analysis date representing the growing season and late spring and summer, incremental shadow from the Projected Development Site 2 RWCDS massing would fall on the southwestern portion of Pier 1 at the start of the analysis period at 6:27 AM (7:27 AM EDT), covering a large area at first, but quickly decreasing in size at it moved east and north and then exiting completely a little over an hour later at 7:40 AM (8:40 AM EDT), as shown on **Figures F-30 to F-32**. The increment would not fall far enough to the south to reach the salt marsh at the southern end of Pier 1 on the May 6 and August 6 representative date. A very small increment would also pass across a portion of the Pier 1 Pavilion and Entryway area in the late morning, lasting for an hour and a half but remaining very small the entire time, while the vast majority of the Pavilion and Entryway area, and Pier 1 in general, would be in sun.

The incremental shadow would not cause a significant adverse impact to recreational use on this date because the increment would be large only briefly, very early in the morning when usage would be lighter than at other times, and would otherwise be very small, while adjacent portions of the park would be in sun. The analysis also concluded that all areas of the park affected by the increment would receive six or more hours of sun over the course of the day (with most affected

areas receiving eight hours or more), and therefore the increment would not cause a significant adverse impact to any of the park's vegetation.

On the June 21 date representing midsummer and the growing season, incremental shadow from the Projected Development Site 2 RWCDS massing would fall on the southwestern portion of Pier 1 at the start of the analysis period at 5:57 AM (6:57 AM EDT), move relatively briskly eastward and northward across the southern area of Pier 1, and exit a little over an hour later at 7:10 AM (8:10 AM EDT), as shown on **Figures F-41 to F-43**. This increment would not cause significant adverse impacts to the recreational use of the park, because it would occur very early, would be small relative to the overall size of the Pier throughout the hour and 31 minute duration, and plenty of sunlit areas would remain all around the affected area. Furthermore, all areas of the park affected by the increment would receive six or more hours of sun over the course of the day (with most affected areas receiving eight hours or more), and therefore the increment would not cause a significant adverse impact to any of the park's vegetation. The increment would pass across a portion of the salt marsh at the southern end of Pier 1 from 6:00 AM to 6:40 AM (7:00 AM to 7:40 AM EDT), as shown in the aforementioned **Figures F-41 to F-43**, but would not significantly affect it because the marsh would be entirely in sun from approximately 7:30 AM to 6:00 PM.

Old Fulton Plaza (#4)

Old Fulton Plaza is a public pedestrian space occupying the full block along the north side of Old Fulton Street between Water and Front Streets. It contains planter pots and boxes and may contain moveable benches or chairs and tables, typically in warmer weather months. The plaza's condition and utilization were characterized as good and moderate, respectively.

On the December 21 analysis date representing winter, small patches and slivers of incremental shadow in between larger areas of pre-existing shadows would fall intermittently on the plaza throughout the day, specifically for about an hour and 15 minutes in the late morning and an hour and 40 minutes in the afternoon (see **Figures F-9, F-10, F-12, and F-14**). Given the very small size of the increment, the likely limited or complete lack of seating or other amenities in cold weather months, and the likely lighter use, the increment would not cause a significant adverse impact to the use of the plaza on this date. Further, as it is outside the growing season, it would not cause a significant adverse impact to the vegetation.

On the March 21/September 21 analysis date representing the early spring and the fall, and the shoulders of the City's growing season, a small shadow increment would pass across a portion of the plaza, between the middle and eastern end, in the late afternoon, for the last 40 minutes of the analysis period (see **Figures F-28 and F-29**). The increment would fall generally where a Citi Bike stand is located, and perhaps on one or a few planter pots, depending on where they are located. Given the very small size, even in the context of the small plaza, the brief duration, and the continued availability of sunlit portions of the plaza and nearby Brooklyn Bridge Park during the affected period, this increment would not cause a significant adverse impact to the recreational use of the plaza. The affected area would receive approximately five or more hours of direct sun on this representative date, and over six hours of sun during the May to August heart of the growing season; therefore, the increment would not cause a significant adverse impact to any plantings briefly affected by the increment.

Incremental shadow would not reach the plaza on the late spring and summer representative dates.

Anchorage Plaza (#5)

Anchorage Plaza is an NYC Parks-operated space bisected north to south by the Brooklyn Bridge and also east to west by the BQE. North of the BQE, the plaza comprises a large landscaped traffic island with a path providing pedestrian circulation under the Brooklyn Bridge, a small traffic island just south of the large one, and a wide strip abutting the Brooklyn Bridge pier on its west side that contains grass and other vegetation and has been entirely or partially fenced off in recent years. South of the BQE, the wide strip abutting the Brooklyn Bridge pier on its west side and the larger space on the east side of the Brooklyn Bridge are slated to be improved, with passive recreational amenities on the west side and pickle ball courts on the east side.[1]

On the December 21 analysis date, a sliver of incremental shadow would fall on the large traffic island for about 50 minutes at the end of the analysis period (see **Figures F-15 and F-16**). The very small increment would not impact the vegetation, as December 21 is outside the growing season, nor would it impact pedestrian circulation. Further, sunlit areas would remain on the plaza during the affected period.

On the March 21/September 21 analysis date representing the early spring and the fall, and the shoulders of the City's growing season, incremental shadow would move across the large and small traffic islands beginning at approximately 2:00 PM (3:00 PM EDT) until nearly the end of the analysis day, and then the northern part of the vegetated strip on the west side of the Brooklyn Bridge pier from about 3:00 PM (4:00 PM EDT) until the end of the analysis period at 4:29 PM (5:29 PM EDT), as shown on **Figures F-24 to F-29**. Given that portions of Anchorage Plaza would remain in sun at all times during the affected period, and that the affected areas function only as pedestrian circulation space and visual amenity, the use of this plaza would not be significantly impacted by the shadow increment. All vegetated areas would continue to receive six or more hours of sunlight and therefore would not be significantly impacted by the incremental shadow on this date.

On the May 6/August 6 analysis date representing the growing season and late spring and summer, incremental shadow would enter and move across the southern part of the vegetated strip on the west side of the Brooklyn Bridge pier for the last hour and 28 minutes of the analysis period, 3:50 PM to 5:18 PM (4:50 PM to 6:18 PM EDT), as shown on **Figures F-37 to F-40**. During the final few minutes of the analysis period, the incremental shadow would also extend minimally into the part of the plaza south of the BQE. The increment would affect only the vegetated strip between the bridge pier and the sidewalk along Old Fulton Street, which has no amenities and only functions as a visual resource. The vegetation in the affected area would continue to receive over six hours of sun and therefore would not be significantly impacted by the incremental shadow.

On the June 21 analysis date, incremental shadow would enter and extend through the portion of the plaza south of the BQE and west of the bridge pier, which is anticipated to be programmed in the future with passive amenities such as seating areas and concessions, for the final 45 minutes of the analysis period, 5:15 PM to 6:01 PM (6:15 PM to 7:01 PM EDT). As shown on **Figures F-52 and F-53**, much of this area of the plaza would remain in sun during this time, and therefore, given the limited extent of the increment and the continued availability of sunlight, the increment would not cause a significant adverse impact to the recreational use of the plaza. All areas of the

[1] CityPickle To Revitalize Brooklyn Anchorage Plaza In Brooklyn Heights

plaza affected by incremental shadow would continue to receive over six hours of sun on this date and therefore any vegetation would not be significantly impacted.

Greenstreets Triangle, Doughty and McKenny Streets (#6)

This small triangular traffic island between Doughty Street, McKenny Street, and the on-ramp to the southbound BQE typically contains either plantings/landscaping or wild grasses. It does not contain any seating or other amenities and is therefore a visual rather than recreational resource.

The island would not receive incremental shadow on the winter or March 21/September 21 analysis dates.

On the May 6/August 6 and June 21 dates representing late spring and summer, it would receive a sliver of new shadow lasting between approximately an hour to an hour and a half (depending on the specific date). The traffic island would continue to get over eight hours of sun on these dates and therefore the new shadow would not cause a significant adverse impact.

Poplar Street Community Garden (#7)

This small triangular space between Poplar Street, Hicks Street, and the off-ramp from the northbound BQE is a lush community garden open April to October, Saturdays and Sundays from 9:00 AM to noon EDT and Tuesdays and Thursdays from 6:00 PM to 8:00 PM EDT, according to its website.

The garden would not receive any incremental shadow on the winter or March 21/September 21 analysis dates.

On the May 6/August 6 representative date, the garden would receive a sliver of new shadow during the last 8 minutes of the analysis period, 5:00 PM to 5:18 PM (6:00 PM to 6:18 PM EDT). Most of the garden would remain in sun during this time, and the negligible size and duration of incremental shadow would not significantly impact the use or plantings in the garden.

On the June 21 representative date, a sliver of incremental shadow would enter the garden at 5:25 PM (6:25 PM EDT) and extend across the garden, eliminating the sun for the final 21 minutes of the analysis period (5:40 PM to 6:01 PM [6:40 PM to 7:01 PM EDT]). The increment would cover half the space in the final minutes, with the other half in existing shadow (see **Figures F-52 and F-53**).

All areas within the garden would continue to receive 10 or more hours of direct sunlight on this date and the increment would therefore not cause a significant adverse impact to the garden.

NATURAL RESOURCES

East River (# N1)

The East River is a tidal strait and sunlight-sensitive natural resource that connects the Western Long Island Sound with the Upper New York Bay.

On the December 21 analysis date, incremental shadow would fall on portions of the East River throughout the morning into midday, from 8:51 AM to 12:15 PM (see **Figures F-4 to F-11**). The incremental shadow would fall northwest of Pier 1 and Fulton Ferry Landing at first before shifting eastward and decreasing in size over the course of the morning, and would be limited to small patches in between pre-existing shadows during the final hour before exiting completely at 12:15 PM.

On the spring, summer, and fall representative dates, the incremental shadow would be limited in duration to less than 30 minutes, first thing in the morning, falling west or southwest of Pier 1 (see **Figures F-17, F-18, F-30, and F-41**).

Exposure to shadows can cause a decrease in light intensity, which can affect primary productivity within the shaded waters. Primary productivity (the rate at which solar energy and simple chemicals are converted to organic biomass through photosynthesis or chemosynthesis) within the study area is generated mainly from phytoplankton. However, light requirements for phytoplankton are low, and the reduction in light within the shadow footprint would have a negligible impact on phytoplankton populations. In addition, the current speeds of the East River in the affected area are swift and would quickly carry any light-dependent phytoplankton through the newly shaded areas to areas outside the shadow exposure, limiting their exposure to shaded conditions to a relatively short period of time. Therefore, shadows resulting from the Proposed Development would not be expected to have a significant adverse impact on primary productivity in the East River.

Shading can also influence fish behavior and habitat use. Fish are generally less abundant in shaded areas under overwater structures compared to unshaded habitats. The avoidance of these shaded areas may be due to decreased visual performance, which can impair feeding and predator avoidance. Such avoidance has the potential to disrupt movement and migration of some species. However, these changes in behavior and habitat use are typically observed with significant shading associated with piers and other overwater structures. Transient shadows, such as those cast by structures along a shoreline, result in less reduction in light reaching the water surface than shading due to overwater structures, and affect different areas over the course of the day, further reducing the potential to affect aquatic biota. Fish would be expected to avoid areas where shadows temporarily resulted in low light, but they would have ample areas of the East River available for foraging and to maintain anadromous fish migration. The incremental shadows would therefore not have a significant effect on fish migration, movement, or spawning in the East River.

Therefore, the transient and generally small incremental shadows resulting from the Proposed Development would be limited in size and duration and would not significantly impact the East River biota. ✷

Attachment G: Historic and Cultural Resources

A. INTRODUCTION

This attachment considers the potential for the Proposed Actions to affect historic and cultural resources. According to the 2025 *City Environmental Quality Review (CEQR) Technical Manual,* historic and cultural resources include both architectural and archaeological resources. Architectural resources generally include historically important buildings, structures, objects, sites, and districts. Archaeological resources are physical remnants, usually buried, of past human activities on a site. The analysis characterizes existing conditions, evaluates changes to historic and cultural resources that are expected to occur in the future without the Proposed Actions (the "No Action" condition), and identifies and addresses any potential impacts to historic and cultural resources anticipated in the future with the Proposed Actions (the "With Action" condition).

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project) at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2) (together, the "Project Area") in Brooklyn Community District 2. As described in Attachment A, "Project Description," a Reasonable Worst-Case Development Scenario (RWCDS) was developed assuming full utilization of allowable floor area ratio (FAR) under the proposed zoning districts, even though the Proposed Development would not utilize all floor area permitted under the proposed rezoning on Projected Development Site 2. The building bulk assumed for the RWCDS reflects the achievement of full FAR utilization with efficient and practicable floorplates conform with industry standards for residential use. The RWCDS includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

PRINCIPAL CONCLUSIONS

As detailed below, the Proposed Actions would not result in a significant adverse impact on historic and cultural resources, with the preparation and implementation of a Construction Protection Plan (CPP) to protect resources within 90 feet of the Project Area during construction.

B. METHODOLOGY

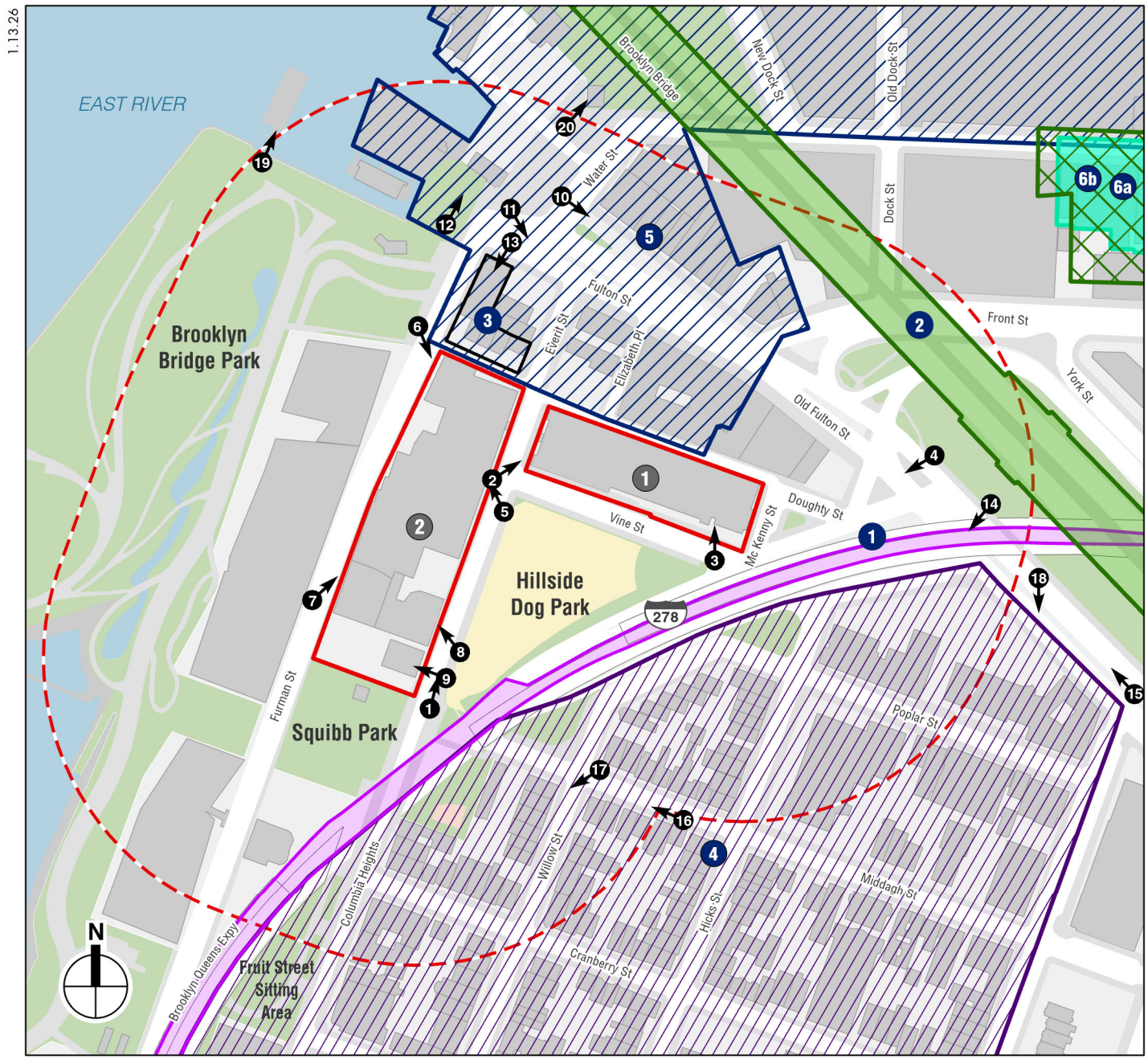
The study area for archaeological resources is defined as the area where subsurface disturbance would occur for the Proposed Project, which is a portion of the Projected Development Site 1 (25 Columbia Heights) parcel. In a comment letter dated October 9, 2025, the New York City Landmarks Preservation Commission (LPC) determined that it had no archaeological concerns for the Project Area (see Appendix 2). Therefore, this chapter focuses on architectural resources only.

Consistent with the guidance of the *CEQR Technical Manual*, in order to determine whether the Proposed Actions could potentially affect architectural resources, this attachment considers whether the Proposed Actions would result in a physical change to any resource or a physical change to the setting of any resource (such as context or visual prominence), and, if so, whether the change is likely to alter or eliminate the significant characteristics of the resource that make it important. More specifically, as set forth in the *CEQR Technical Manual*, potential impacts to architectural resources may include the following:

- Physical destruction, demolition, damage, alteration, or neglect of all or part of a historic property;
- Changes to an architectural resource that cause it to become a different visual entity;
- Isolation of the property from, or alteration of, its setting or visual relationships with the streetscape, including changes to the resource's visual prominence;
- Introduction of incompatible visual, audible, or atmospheric elements to a resource's setting;
- Replication of aspects of the resource so as to create a false historical appearance;
- Elimination or screening of publicly accessible views of the resource;
- Construction-related impacts, such as falling objects, vibration, dewatering, flooding, subsidence, or collapse; and
- Introduction of significant new shadows, or significant lengthening of the duration of existing shadows, over a historic landscape or on a historic structure (if the features that make the resource significant depend on sunlight) to the extent that the architectural details that distinguish that resource as significant are obscured.

To evaluate potential effects due to on-site construction activities, and to account for visual or contextual impacts, the study area for architectural resources is defined as extending 400 feet from the Project Area (see **Figure G-1**). As defined in the New York City Department of Building's (DOB) *Technical Policy and Procedure Notice (TPPN) #10/88,* adjacent construction is defined as any construction activity that would occur within 90 feet of an architectural resource.[1] Consistent with the guidance of the *CEQR Technical Manual*, designated architectural resources that were analyzed include: New York City Landmarks (NYCL); Interior Landmarks, Scenic Landmarks, and New York City Historic Districts (NYCHD); resources calendared for consideration as one of the above by LPC; resources listed on or formally determined eligible for inclusion on the State and National Registers of Historic Places (S/NR), or contained within a

[1] *TPPN #10/88* was issued by DOB on June 6, 1988, to supplement Building Code regulations with regard to historic structures. *TPPN #10/88* outlines procedures for the avoidance of damage to historic structures resulting from adjacent construction, defined as construction within a lateral distance of 90 feet from the historic resource.



Architectural Resources Reference Map

COLUMBIA HEIGHTS REZONING

Figure G-1

district listed on or formally determined eligible for listing on the Registers; resources recommended by the New York State Board for listing on the Registers; and National Historic Landmarks (NHL). In addition, a survey was conducted to identify any previously undesignated properties that appear to meet S/NR or NYCL eligibility criteria ("potential architectural resources").

C. EXISTING CONDITIONS

PROJECT AREA

As detailed above, the Project Area consists of one parcel located on Projected Development Site 1 (Block 204, Lot 1), and one parcel located on Projected Development Site 2 (Block 208, Lots 1, 2, and 12). Projected Development Site 1 comprises the block bounded by Columbia Heights, Vine Street, McKenny Street, and Doughty Street. Projected Development Site 2 is bounded by Columbia Heights, Doughty Street, Furman Street, and Squibb Park. See **Figures G-2 through G-4**.

The west side of Projected Development Site 1 is developed with a 12-story, 131-foot-tall concrete factory building, constructed in 1924.[2] It was developed by the E.R. Squibb & Sons Pharmaceutical Company and designed by Russell G. Cory and Walter M. Cory of Turner Construction Company. A 10-story,116-foot-tall concrete panel-clad addition, constructed in 1980, occupies the eastern half of the parcel. The addition was built by the Watchtower Bible and Tract Society, which acquired the Project Area in 1969. In total, the 25 Columbia Heights development is 341,990 gsf in size.

Lots 1 and 12 on Block 208 are not currently developed. Block 208, Lot 2 is developed with four buildings: 30 Columbia Heights, 50 Columbia Heights, 58 Columbia Heights, and 55 Furman Street. These four existing, abutting commercial buildings total 399,020 gsf, the largest of which is 30 Columbia Heights, a 13-story (141-foot) building occupying the northern portion of the site: the 13-story, 141-foot-tall concrete factory building is proposed for partial residential conversion and enlargement, while the three smaller buildings (4-5 stories and 39-53 feet) would retain their existing configuration and uses.[3] 30 Columbia Heights was built in 1928 by the E.R. Squibb & Sons Pharmaceutical Company, with a large addition at its southern end constructed in 1940. The building at 30 Columbia Heights is connected to 25 Columbia Heights by a two-story skybridge over Columbia Heights.

50 Columbia Heights is a four-story, red brick building located directly south of the 30 Columbia Heights building. It was built prior to 1887, based on historic maps from that date. From at least 1950 to 1969, it was in use by the perfume company Lentheric. It has been altered with the replacement of its original windows with single-pane windows. It is connected on its south façade to 58 Columbia Heights. 58 Columbia Heights is five-story, red brick building located directly south of 50 Columbia Heights. It was built between 1887 and 1904, and was in use in 1904 as a candy factory and later for painting, lithographic ink, and perfume manufacturing. As with 50 Columbia Heights, it has been altered with the replacement of its original windows with single-pane windows and to connect to the adjacent structure.

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[2] Height in stories includes a cellar level that is at grade on Doughty Street and partially below grade on Vine Street. Height in feet does not include rooftop mechanical bulkhead.

[3] Height in feet does not include rooftop mechanical bulkhead.



Development Site buildings, view north on Columbia Heights **1**



25 Columbia Heights, view northeast from Columbia Heights at Vine Street **2**



25 Columbia Heights, eastern addition, view northwest from Vine Street **3**



25 Columbia Heights, eastern addition, view southwest from Old Fulton Street **4**



30 Columbia Heights, view northwest from Columbia Heights and Vine Street **5**



30 Columbia Heights, view southeast from Doughty and Furman Streets **6**

Development Site



30 Columbia Heights and 55 Furman Street, view northeast from Furman Street **7**



50 Columbia Heights, view from Columbia Heights **8**



58 Columbia Heights, view from Columbia Heights **9**

Development Site

Figure G-4

55 Furman Street is a four-story, red brick former manufacturing building located directly west of 50 Columbia Heights. 55 Furman Street was built in 1880 by William C. and Fredrick R. Fowler as a factory and was designed by Isaac Gosling. It was later used by the De Haven Manufacturing Company for wire working and storage, and then for cod liver storage by the E.R. Squibb & Sons Pharmaceutical Company. It has been altered with the replacement of its original windows and door openings. There is a fire escape at the northern end of the building's Furman Street façade, and the upper story window openings on that façade are round arched. There are also star-shaped masonry wall ties on this façade.

The Project Area buildings were sold in 1969 to the Watchtower Bible and Tract Society, which expanded and adapted the site in 1978, using it for various institutional functions including offices, storage, a trade school, and lodging. As noted above, the 1980 addition to 25 Columbia Heights was constructed during Watchtower's ownership of the site; interior alterations to the buildings to convert them from manufacturing use are also assumed to have occurred. In 2016, the buildings were acquired by their current owner for commercial redevelopment but have since remained vacant, despite being renovated after their acquisition. Alterations made at that time included new interior finishes; structural upgrades on the roof and parapet; removal of the "Watchtower" rooftop illuminated sign and replacement with a "Welcome" rooftop illuminated sign at 30 Columbia Heights; enclosure of the uppermost level of the western building at 25 Columbia Heights with a glazed façade; creation of a 5-level basement parking garage at 25 Columbia Heights; removal of an interior floor within 55 Furman Street; addition of an exterior elevator shaft, enclosed in black metal panels, at the southern façade of 58 Columbia Heights; renovation of the elevator at 50 Columbia Heights; new elevator shaft construction at 25 and 30 Columbia Heights; redesign of the entry plaza and entry at 25 Columbia Heights (the eastern addition); addition of a terraced open space extending from the rear of 58 Columbia Heights; and creation of an external four-level staircase on the Furman Street side of 30 Columbia Heights with viewing platforms and terraces, replacing a former loading area with a cantilevered roof. Earlier changes to the buildings include enclosure of the uppermost level of the western building at 25 Columbia Heights with tinted windows; replacement of original multi-paned windows at all buildings; the removal of the tall, square tower above the 25 Columbia Heights 1924 building; and the removal of the original "Squibb" rooftop sign and replacement with the "Watchtower" illuminated rooftop sign.

As detailed above, the buildings in the Project Area have been altered over time and are not identified as potential architectural resources. In 2005, as part of the environmental review of the Brooklyn Bridge Park project, OPRHP determined that the 55 Furman Street building was not eligible for S/NR listing. LPC also determined at that time that the building was not NYCL-eligible. In its comment letter dated October 9, 2025, LPC determined that the buildings in the Project Area have no architectural significance (see Appendix 2).

STUDY AREA

There are five known architectural resources within the study area, and one known architectural resource (a historic district) located just outside of the study area boundaries. The architectural resources are listed below in **Table G-1** and shown in **Figure G-1**. Descriptions of these resources are also provided below with photos shown on **Figures G-5 through G-8**. No potential architectural resources were identified within the study area.

Directly north of the Rezoning Area is the **Fulton Ferry Historic District**, which is an NYCHD that is also listed on the S/NR. The Fulton Ferry Historic District is roughly bounded by the East River to the west and north, Main and Front Streets to the east, and Water and Doughty Streets



Fulton Ferry Historic District, view northeast from foot of Old Fulton Street **10**



Fulton Ferry Historic District, view southeast from Old Fulton Street **11**



Fulton Ferry Historic District, view north at Fulton Ferry Landing **12**

Architectural Resources in Study Area

Figure G-5



Brooklyn City Railroad Building, view south from Old Fulton Street **13**



Brooklyn-Queens Expressway, view south from Old Fulton Street near Development Site **14**



Brooklyn-Queens Expressway, view west from Old Fulton Street near Henry Street **15**

Architectural Resources in Study Area



Brooklyn Heights Historic District, view west on Middagh Street west of Hicks Street **16**



Brooklyn Heights Historic District, west side of Willow Street, view southwest from near Middagh Street **17**



South side of Old Fulton Street between Henry and Hicks Streets, view to southeast **18**

Architectural Resources in Study Area



Brooklyn Bridge, view northwest from Pier 1 of Brooklyn Bridge Park **19**



Brooklyn-side anchorage of the Brooklyn Bridge, view from Fulton Ferry Landing **20**

Architectural Resources in Study Area

Figure G-8

to the south. It includes an assortment of commercial and commercial/residential buildings built between 1830 and 1895, constructed primarily of brick and ranging in height from one to four stories, with one exception (the nine-story, massive Eagle Warehouse, a Romanesque Revival brick structure designed in 1893 by Frank Freeman). There are also a few 20th century structures within the district, including the clapboard former Fireboat House at the foot of Fulton Street (see views 10-12 of **Figure G-5**).

The historic district area was inhabited by the Marechkawiek until around 1637, when the land was conveyed to Dutch settlers who had arrived to the area a few years prior. This initial residential settlement evolved into an area that was home to a variety of commercial establishments, including taverns, hotels, banks, and law firms and, later, buildings related to shipbuilding and warehousing, such as the Empire Stores and Tobacco Inspection Warehouses located on the north side of Water Street. The development of the area was closely tied to the ferry service connecting Brooklyn and Manhattan, which was established as early as 1643. Railroad lines were installed at Fulton Ferry Landing in the 1850s. The construction and opening of the Brooklyn Bridge in 1883 led to the termination of ferry service to the area in 1924, and the area transitioned to warehouse, trucking, and light industrial uses. The area has since experienced a resurgence, with the development of Brooklyn Bridge Park and renovation of historic buildings including the Empire Stores warehouse (seven warehouses linked by a continuous brick façade with arched openings, constructed in 1870 and 1885). Ferry service returned to the area in 2006.

Within the boundaries of the Fulton Ferry Historic District is the **Brooklyn City Railroad Building** at 8 Old Fulton Street, which is an individual NYCL and S/NR-listed. The Brooklyn City Railroad Building is a five-story office building constructed in the Italianate style (see view 13 of **Figure G-6**). It was built in 1860-1861 for the Brooklyn City Railroad Company, which was incorporated in 1853 and operated horse-car lines that brought passengers to and from the Fulton Ferry terminal. The building was constructed on the former site of William Furman's house, which was at the water's edge, directly in front of the ferry stairs; the land was later extended by fill into the East River. The brick building has granite quoins and window enframements, and a cast iron storefront. It is now in residential use.

To the east of the Project Area is the **Brooklyn-Queens Expressway** (BQE), a 12-mile-long segment of Interstate 278 (I-278) located between the Hugh L. Carey Tunnel in Brooklyn and the Grand Central Parkway in Queens. From Atlantic Avenue north to beyond Nassau Street, the BQE is an elevated highway that passes above city streets, parkland, and transportation right-of-way. The BQE was determined S/NR-eligible under the Federal Highway Administration's Final List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System, published in the Federal Register on December 19, 2006. The eligibility determination encompasses the triple-cantilever and the BQE structure between mileposts 16 and 22 (Atlantic Avenue to the Thaddeus Kosciuszko Bridge). The Resource Evaluation prepared for the BQE by the New York State Historic Preservation Office (SHPO) on November 6, 2018, states that this section of the BQE has been determined eligible in areas C and A, Engineering and Social History. The evaluation quotes the Federal Highway Administration's (FHWA) statement of significance: "Running between Brooklyn Heights and the Thaddeus Kosciuszko Bridge, this corridor along the Brooklyn-Queens Expressway is significant for the design of its bridges, roadside features, and park development. The Brooklyn-Queens Expressway contains a unique collection of Art Deco-style, multi-flange beam and column capped bridges and stone or brick-lined retaining walls. Robert Moses mitigated the impact of the expressway by building small neighborhood parks in vacant spaces left by buildings demolished for roadway construction and using brick facing on

concrete abutments in an attempt to blend the expressway into the urban landscape" (OPRHP: 2018). Hillside Dog Park and Squibb Park, directly adjacent to the Project Area, were both developed on sites acquired as part of the construction of the BQE (see views 14 and 15 of **Figure G-6**).

The **Brooklyn Heights Historic District** (NHL, S/NR, NYCHD) is located south and east of the Project Area and the BQE, between Furman Street and Cadman Plaza West. The Brooklyn Heights Historic District was New York City's first designated historic district. After the establishment of the steam-powered Fulton Ferry in 1814, the Heights became the first area of Brooklyn to be urbanized. The area contains a collection of various building styles and types that together represent New York's urban residential development from the early 19th century. During the 1820s and early 1830s, elegant two-and-one-half story Federal houses were built, primarily in the northern section of the Heights (the portion of the historic district nearest the Project Area). By the 1830s and 1840s, large-scale speculative row house construction took place in the area, and many three-story brick Greek Revival houses were erected. Gothic Revival row houses were constructed in the 1840s, and by the 1860s, individual Italianate row houses were being constructed. A few Queen Anne and Romanesque Revival row houses and mansions were built in the 1880s and 1890s. Beginning in the 1880s, the first middle-class apartment buildings were erected in the area. During the early 20th century and continuing into the following decades, many apartment houses, apartment buildings, and apartment hotels were erected in the Heights in varying styles, including Beaux-Arts, English-Gothic, Romanesque, and Colonial Revival. Art Deco structures were built in the 1930s and 1940s and modern structures were erected in the area during the post-World War II era. Several important institutional buildings are also located in the district and include the Plymouth Congregational Church (1849-50), First Presbyterian Church (1846), First Unitarian Church of Brooklyn (1844), Church of the Savior (1842-44), Long Island Historical Society (1878-81), Holy Trinity Church (1844-47), Church of the Pilgrims (1844-46), Heights Casino and Casino Mansions Apartments (1905 & 1910), Grace Church (1847-49), Packer Collegiate Institute for Girls (1853-56), and Saint Ann's Church (1866-69) (see views 16-18 of **Figure G-7**).

The **Brooklyn Bridge** (NHL, S/NR, NYCL) spans the East River between Cadman Plaza, Brooklyn, and City Hall Park, Manhattan (see views 19 and 20 of **Figure G-8**). The bridge is an instantly recognizable symbol of New York City and has a strong visual impact on the surrounding neighborhoods, especially the Fulton Ferry Historic District. Construction of the steel suspension bridge was originally conceived in 1867 by John A. Roebling, a German immigrant engineer who invented wire cable and was an accomplished bridge builder. When John Roebling died in 1869 from an injury sustained during construction of the bridge, his son Washington took over construction. Although paralyzed by caisson disease in 1872, Washington continued—with the help of his wife Emily—to oversee construction of the bridge from the window of a house in Brooklyn Heights. The Brooklyn Bridge was the first physical link between Brooklyn and Manhattan. It opened in 1883 and was the longest suspension bridge at the time of its completion, spanning 1,595.5 feet between towers. The bridge was described as the "new eighth wonder of the world" and is considered one of the greatest engineering feats of the 19th century. It is characterized by two massive granite-clad towers with pointed Gothic arches and a network of steel cables and vertical wires.

North of the Brooklyn Bridge and east of the Fulton Ferry Historic District, just outside the study area, is the DUMBO historic district (S/NR, NYCHD). DUMBO, an acronym for Down Under the Manhattan Bridge Overpass, is one of New York City's most significant extant industrial waterfront neighborhoods. During much of the nineteenth and twentieth centuries, the area was home to

some of the largest and most important manufacturing businesses in Brooklyn or New York City. The historic district is roughly bounded by the East River to the north, Bridge Street to the east, Front and York Streets to the south, and the Fulton Ferry Historic District to the west. Most of the extant factories in the historic district were built between 1880 and the first decades of the 20th century. A few low-rise residential and commercial structures are also located in the district. The industrial buildings range in height from one to twelve stories and include foundry, manufacturing, storage and loft buildings. Most of the factories in the district were constructed by large companies and were designed by prominent Brooklyn architects, including William Tubby, the Parfitt Brothers and William Higginson, who was responsible for most of the major reinforced concrete buildings in the district. The Robert Gair Company, which manufactured folded paper boxes and did lithography, printing and engraving, changed the building material that was used in the area—brick—when it introduced reinforced concrete construction in 1900. Gair erected a series of concrete buildings that, along with concrete buildings erected by the Sweeney Company, the Arbuckle Company, and others, forms one of the earliest and densest concentrations of reinforced concrete buildings in the nation.

Table G-1
Known Architectural Resources

Ref. No	Block/Lot	Address	Name	NHL	S/NR-Listed	S/NR-Eligible	NYCL/ NYCHD
1	N/A	Roughly bounded by the East River and Doughty, Water, Front and Main Streets	Fulton Ferry Historic District		X		X
2	200/5	8 Old Fulton Street	Brooklyn City Railroad Company Building		X		X
3	N/A	Mileposts 16 to 22 (Atlantic Avenue to the Kosciuszko Bridge)	Brooklyn-Queens Expressway			X	
4	N/A	Roughly bounded by Old Fulton Street, Atlantic Avenue, and Furman, Henry, Clinton and Court Streets	Brooklyn Heights Historic District	X	X		X
5	N/A	Spans East River between Brooklyn and Manhattan	Brooklyn Bridge	X	X		X
6	N/A	Roughly bounded by John, Bridge, Front, York, and Main Streets	DUMBO Historic District		X		X

Notes:
N/A – Not applicable
NYCL – New York City Landmark
NYCHD – New York City Historic District
NYCL-eligible – determined by LPC to appear to meet NYCL eligibility criteria
S/NR – Listed on the State and National Registers of Historic Places
S/NR-eligible – Officially determined eligible for listing on the State and National Registers of Historic Places
S/NR-certified – Certified by the National Park Service as National Register eligible as a "certified local historic district."
NHL – Historic Landmark
Sources: Discover NYC Landmarks at https://www1.nyc.gov/site/lpc/index page accessed July 2025; New York State Historic Preservation Office Online Resources (CRIS) at https://cris.parks.ny.gov/ accessed July 2025.

D. THE FUTURE WITHOUT THE PROPOSED ACTIONS

PROJECT AREA

As described in Attachment A, "Project Description," in the No Action condition, the existing buildings in the Project Area (25 Columbia Heights, 30 Columbia Heights, 50 Columbia Heights, 58 Columbia Heights, and 55 Furman Street) would be retenanted with commercial uses compliant under the existing zoning. These uses are permitted under existing zoning; no discretionary actions would be required, and no residential development would occur.

STUDY AREA

Within the study area, there are four projects anticipated to be completed by the project's build year (2029), all located within the Brooklyn Heights Historic District southeast of the Project Area at 11 Cranberry Street, 12 Middagh Street, 24 Middagh Street, and 29 Willow Street. The projects at 11 Cranberry Street, 12 Middagh Street, and 24 Middagh Street will convert existing two- and three-family residences to single-family use, and the project at 29 Willow Street will convert an existing five-story, multi-family residential building to single-family use. Since the projects are located within the Brooklyn Heights Historic District, an NYCHD, they require review and approval by LPC. LPC has reviewed and approved the projects at 11 Cranberry Street, 12 Middagh Street, and 24 Middagh Street. At this time, LPC review of the project at 29 Willow Street appears ongoing.

Architectural resources that are located within 90 feet of construction for an as-of-right development are offered some protection through DOB controls governing the protection of adjacent properties from construction activities. Specifically, the provisions of the 2014 New York City Building Code provide protection measures for all properties against accidental damage from adjacent construction by requiring that all buildings, lots, and service facilities adjacent to foundation and earthwork areas be protected and supported. Further, Building Code Chapter 3309.4.4 requires that "historic structures that are contiguous to or within a lateral distance of 90 feet from the edge of the lot where an excavation is occurring" be monitored during the course of excavation work. ("Historic structures" in this context are defined as NYCLs, properties within NYCHDs, and S/NR-listed properties.) The DOB *TPPN #10/88* supplements the building protections afforded by the Building Code by requiring a monitoring program to reduce the likelihood of construction damage to adjacent NYCLs and S/NR-listed properties (within 90 feet) and to detect at an early stage the beginnings of damage so that construction procedures can be changed. Since all of the projects in the Study Area that will occur in the future independent of the Proposed Actions are located within the Brooklyn Heights Historic District, it is expected that *TPPN #10/88* will be implemented to avoid construction-related damage to historic buildings within 90 feet.

In the No Action condition, changes to the condition or setting of architectural resources within the study area could occur. It is possible that some architectural resources in the study area could deteriorate or experience direct impacts through alteration or demolition, while others could be restored. Architectural resources that are listed on the National Register or that have been found eligible for listing are given a measure of protection from the effects of federally sponsored or assisted projects under Section 106 of the National Historic Preservation Act. Although preservation is not mandated, federal agencies must attempt to avoid adverse impacts on such resources through a notice, review, and consultation process. Properties listed on the State Register are similarly protected against impacts resulting from state-sponsored or state-assisted

projects under the State Historic Preservation Act. Privately owned and City-owned sites that are NYCLs or within NYCHDs are protected under the New York City Landmarks Law, which requires LPC review and approval before any alteration or demolition can occur.

E. THE FUTURE WITH THE PROPOSED ACTIONS

The Proposed Actions would allow for residential, commercial, and community facility uses in the Project Area and would result in the adaptive reuse and enlargement of the existing 25 and 30 Columbia Heights buildings. As described in Attachment A, "Project Description," the RWCDS for this EAS assumes the full utilization of allowable floor area ratio (FAR) under the proposed zoning districts, with building heights that reflect the achievement of full FAR utilization with efficient and practicable floorplates that could reasonably be built.

Under the RWCDS, Projected Development Site 1 would be enlarged from 12 stories (131 feet) to 17 stories (210 feet), an increase of approximately 79 feet. The upper floors of the existing building would be removed and replaced as part of the enlargement. The enlarged building would contain approximately 460,570 gsf, an increase of approximately 118,580 gsf. The building would be occupied by residential, commercial and/or community facility, and accessory parking uses.

Under the RWCDS, the southern portion of the 30 Columbia Heights building on Projected Development Site 2 would be enlarged from 13 stories (141 feet) to 19 stories (205 feet), an increase of approximately 64 feet. The upper floors of this portion of the existing building would be removed and replaced as part of the enlargement. As detailed in Attachment A, "Project Description," Table A-1, the enlarged building would contain approximately 544,910, an increase of approximately 145,890 gsf. The building would be occupied by residential, commercial, and parking uses. The skybridge between 25 and 30 Columbia Heights would be removed as part of the Proposed Development.

50 Columbia Heights, 58 Columbia Heights, and 55 Furman Street would not be altered in terms of bulk, and would continue to be occupied with commercial uses, as in the No Action condition. See Figure 6a in Attachment A, "Project Description," for a graphic representation of the enlargement of 25 and 30 Columbia Heights under the RWCDS.

DIRECT (PHYSICAL) IMPACTS

As described above, there are no known or potential architectural resources within the Project Area. Using the *CEQR Technical Manual* direct impact criteria noted above, the Proposed Actions would not result in any changes to architectural resources that would cause them to be a different visual entity, such as a new location, design, materials, or architectural features; or cause a false historical appearance. As described in Attachment F, "Shadows," the Proposed Actions would not result in any significant adverse shadow-related impacts to historic resources with sunlight-sensitive features.

Portions of the Fulton Ferry Historic District (S/NR-listed, NYCHD), including the Brooklyn City Railroad Building (S/NR-listed, NHCL), and the BQE (S/NR-eligible) are located within 90 feet of the Rezoning Area. As the Fulton Ferry Historic District is a NYCHD and S/NR-listed, and the Brooklyn City Railroad Building is a NYCL and S/NR-listed; implementation of *TPPN #10/88* would be required for the Proposed Development. While the BQE is a S/NR-eligible resource, it is not S/NR-listed, a NYCL, or within a NYCHD; therefore, the special protections to avoid construction-related damage to historic structures under *TPPN #10/88* are not required.

The Proposed Development would retain the existing buildings in the Project Area and thus would require limited subsurface disturbance and would not require any blasting or dewatering. While construction-related vibrations associated with the Proposed Development would be limited, to avoid inadvertent demolition and/or construction-related damage from ground-borne construction period vibrations, falling debris, collapse, etc. associated with construction, the portions of the Fulton Ferry Historic District and the BQE that are located within 90 feet of the Project Area would be included in a CPP to be reviewed and approved by LPC. As detailed in Chapter 9, Section 522, of the *CEQR Technical Manual*, a CPP should be used to protect historic resources that may be affected by construction activities related to a proposed project. The CPP would be prepared as set forth in Section 523 of the *CEQR Technical Manual* and in compliance with the procedures included in the DOB's *TPPN #10/88* and LPC's *Guidelines for Construction Adjacent to a Historic Landmark* and *Protection Programs for Landmark Buildings*. The CPP would be prepared and implemented prior to and during construction activities for the Proposed Development. The applicant would coordinate with the New York State Department of Transportation (NYSDOT) regarding any procedures to be followed to prevent any damage to the BQE during construction of the Proposed Development.

The remaining architectural resources in the study area are located more than 90 feet from the Rezoning Area. Therefore, the Proposed Actions would not be expected to have the potential for adverse physical, construction-related impacts to these resources, and there would be no physical changes to the architectural resources in the study area identified above.

INDIRECT IMPACTS

The *CEQR Technical Manual* criteria for indirect, contextual impacts are as follows:

- Isolation of a property from, or alteration of, its setting or visual relationships with the streetscape, including changes to the resource's visual prominence;
- Introduction of incompatible visual, audible, or atmospheric elements to a resource's setting; and
- Elimination or screening of publicly accessible views of the resource.

As described above, in the With Action condition under the RWCDS, the two existing buildings at 25 and 30 Columbia Heights would be enlarged and their heights would increase by 79 and 64 feet (to 210 feet and 205 feet), respectively. While the study area comprises multiple historic districts, the context of the architectural resources within this area already includes a mix of older and newer, shorter and taller buildings. Newer and taller buildings within the study area include the 1 Hotel Brooklyn Bridge and Pierhouse developments directly west of the Project Area on the west side of Furman Street; these are 10 stories tall and modern in design and materials (glass and metal). On the north side of the Brooklyn Bridge is the recently constructed 60 Water Street development, which is 17 stories tall and clad in glass. Just outside of the study area are the Olympia DUMBO development at 30 Front Street, which is 26 stories (approximately 373 feet) in height and was constructed in 2023, and the 27-story apartment building at 140 Cadman Plaza West, built in 1967.

At the pedestrian level, the context of the architectural resources in the study area would change with the Proposed Actions and the enlargement of the 25 and 30 Columbia Heights buildings; however, the existing low-scale, red brick buildings at 50 and 58 Columbia Heights and 55 Furman Street would not be altered with the Proposed Actions, and the lower levels and oldest portions of the 25 and 30 Columbia Heights buildings would be generally consistent with their current

appearance, serving to moderate the change to the existing context. Furthermore, the context of architectural resources in the surrounding area has already changed with recent developments, including those described above.

The Proposed Actions would not result in the elimination or screening of significant publicly accessible views of any architectural resources in the study area. The removal of the skybridge between the 25 and 30 Columbia Heights buildings would make the Brooklyn Bridge span and the Manhattan Bridge Manhattan-side anchorage more visible in the Columbia Heights view corridor. Further, the Proposed Actions would not result in the isolation of any architectural resource from its setting or visual relationship with the streetscape, or significantly adversely alter a historic property's setting or visual prominence. The Proposed Actions would not introduce incompatible visual, audible, or atmospheric elements to the setting of any architectural resource.

In summary, the Proposed Actions would not result in a significant adverse impact on historic and cultural resources, with the preparation and implementation of the CPP detailed above. ✷

Attachment H: Urban Design and Visual Resources

A. INTRODUCTION

This attachment considers the potential of the Proposed Actions to affect urban design and visual resources. According to the 2025 *City Environmental Quality Review (CEQR) Technical Manual*, urban design is defined as the totality of components that may affect a pedestrian's experience of public space. These components include streets, buildings, visual resources, open spaces, natural resources, and wind conditions. Visual resources are defined as the connection from the public realm to significant natural or built features, including, but not limited to, views of the waterfront, public parks, public art, historic buildings or districts, otherwise distinct buildings, and natural resources. Using the methodology recommended in the *CEQR Technical Manual*, an urban design assessment considers whether and how a project may change the experience of a pedestrian in a project area. The *CEQR Technical Manual* guidelines recommend preparation of a preliminary assessment of urban design and visual resources, followed by a more detailed analysis (if warranted), based on the conclusions of the preliminary assessment. The analysis provided in this attachment follows the recommended CEQR methodology and evaluates urban design characteristics and visual resources for existing conditions, the future without the Proposed Actions (the "No Action" condition), and the future with the Proposed Actions (the "With Action" condition).

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project") at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2") (together, the "Project Area"). As described in Attachment A, "Project Description," a Reasonable Worst-Case Development Scenario (RWCDS) was developed assuming full utilization of allowable floor area ratio (FAR) under the proposed zoning districts, even though the Proposed Development would not utilize all floor area permitted under the proposed rezoning on Projected Development Site 2. The building bulk assumed for the RWCDS reflects the achievement of full FAR utilization with efficient and practicable floorplates that conform with industry standards for residential use. The RWCDS for the EAS includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

PRINCIPAL CONCLUSIONS

As detailed below, the preliminary assessment concludes that in comparison to the No Action condition, the Proposed Actions would not be expected to result in any significant adverse impacts to urban design and visual resources.

B. METHODOLOGY

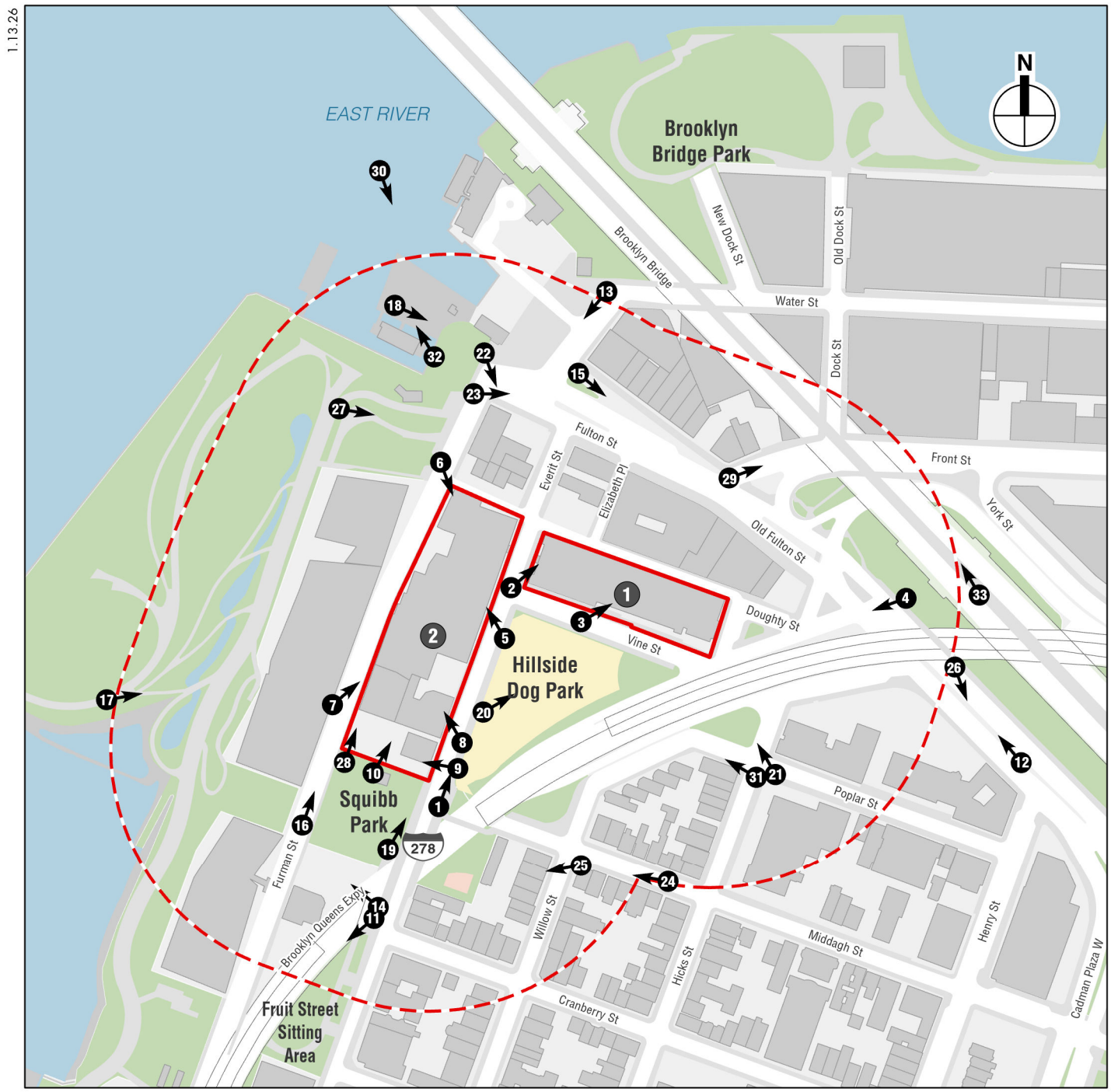
Based on the methodology presented in the *CEQR Technical Manual*, a preliminary assessment of urban design and visual resources is appropriate when a project may result in the potential for a pedestrian to observe, from the street level, a physical alteration beyond that allowed by existing zoning. Examples include projects that would permit the modification of yard, height, and setback requirements, and projects that would result in an increase in built floor area beyond what would be allowed "as-of-right" or in the No Action condition.

Since the Proposed Actions would result in an increase in allowable density at the Development Site, they would result in physical alterations observable by pedestrians in comparison to what is allowed by existing zoning. Therefore, the Proposed Actions meet the threshold for a preliminary assessment of potential impacts to urban design and visual resources.

According to the methodology presented in the *CEQR Technical Manual*, the study area for urban design is the area where a project may influence land use patterns and the built environment and is generally consistent with the information used for the land use, zoning, and public policy analysis. For consideration of visual resources, the study area consists of view corridors within the study area from which visual resources are publicly viewable. Consistent with *CEQR Technical Manual* methodologies, the study area for the urban design and visual resources analysis has been defined as a 400-foot radius around the Development Site, consistent with the analysis of land use, zoning, and public policy in Attachment B, "Land Use, Zoning, and Public Policy." The study area is roughly bounded by the Brooklyn Bridge to the north, Hicks and Henry Streets to the east, Cranberry Street to the south, and Brooklyn Bridge Park and the East River to the west (see **Figures H-1 and H-2**). For visual resources, views from the Brooklyn Bridge are also considered.

The *CEQR Technical Manual* guidelines state that if the preliminary assessment shows that changes to the pedestrian environment are sufficiently significant to require greater explanation and further study, then the lead agency may determine that a more detailed analysis is appropriate. The assessment presented in this attachment concludes that a more detailed analysis is not warranted for the Proposed Actions.

The *CEQR Technical Manual* recommends an analysis of pedestrian wind conditions for projects that would result in the construction of large buildings at locations that experience high wind conditions (such as along the waterfront, or other locations where winds from the waterfront are not attenuated by buildings or natural features), which may result in an exacerbation of wind conditions due to "channelization" or "downwash" effects that may affect pedestrian safety. The Proposed Actions are not along the waterfront and would not result in the construction of large buildings at locations that would experience high wind conditions, and thus a pedestrian wind analysis is not warranted.



Urban Design and Visual Resources Reference Map

COLUMBIA HEIGHTS REZONING

Figure H-1



1.13.26

Data source: NYC 2022 Orthoimagery via NYS, https://gis.ny.gov/orthoimagery

0 400 FEET

Project Area

1 Projected Development Site

Study Area (400-foot perimeter)

Aerial

COLUMBIA HEIGHTS REZONING

Figure H-2

C. EXISTING CONDITIONS

This analysis considers the urban design of the Development Site and surrounding study area, followed by an evaluation of views to visual resources in the Project Area and surrounding study area.

URBAN DESIGN

Figures H-3 and H-4 illustrate the urban design characteristics of the Development Site and the study area, including built floor area ratio (FAR) and lot coverage.

DEVELOPMENT SITE

The Development Site has an approximate total lot area of 101,720 square feet (sf) and has frontages on Columbia Heights and Furman, Doughty, Vine, and McKenny Streets. There are five buildings on the Development Site.

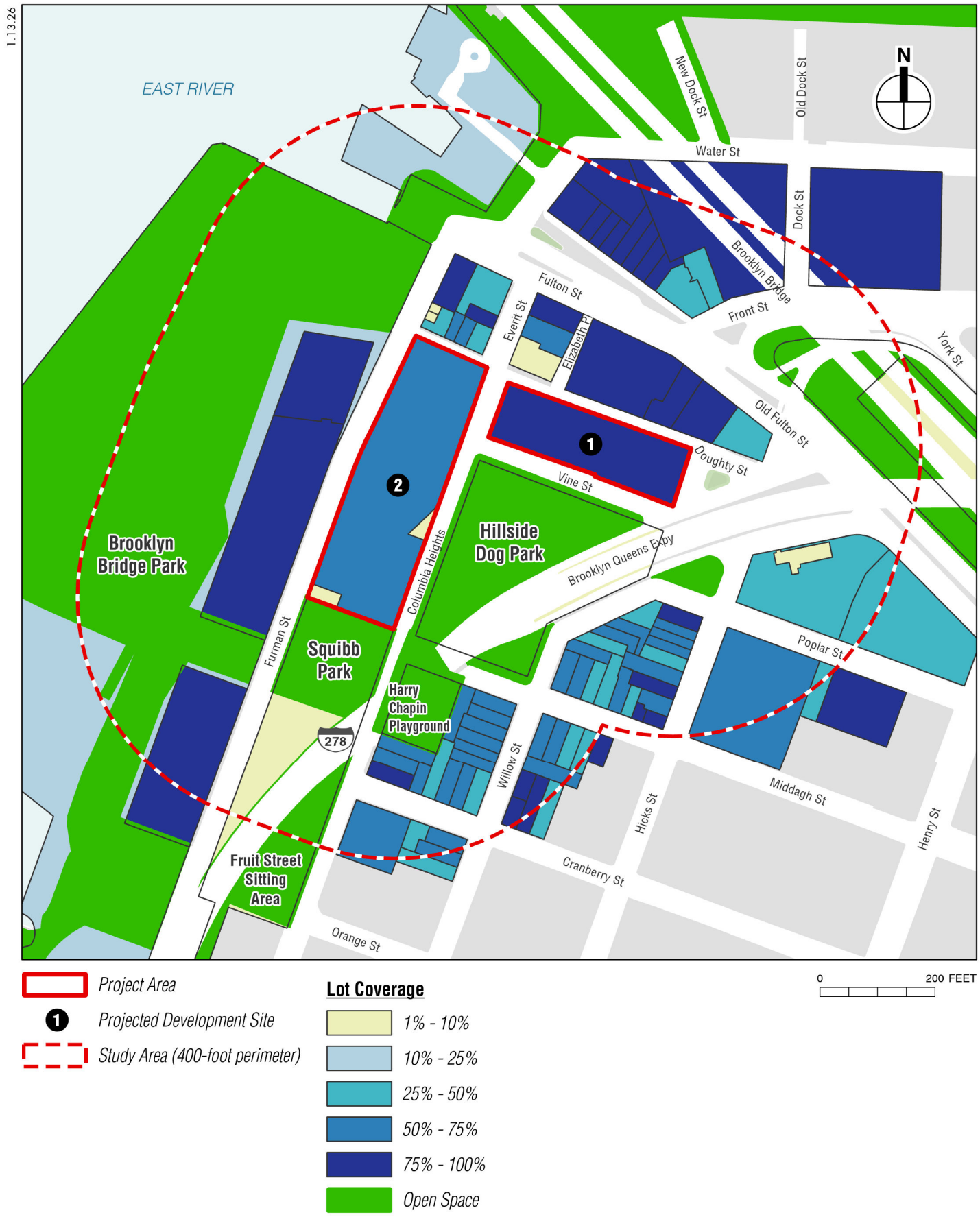
Projected Development Site 1 is bounded by Columbia Heights and Vine, McKenny, and Doughty Streets. It is developed with one building. The west side of the parcel comprises a 12-story, 131-foot-tall concrete building, originally constructed as a factory.[1] A 10-story,116.5-foot-tall concrete panel-clad addition occupies the eastern half of the parcel. The main entrance to the building is on the west side of the addition's Vine Street façade, set back behind a shallow set of stairs. There is a five-level basement parking facility within the addition, accessed via McKenny Street. The original uppermost level of the western portion of the building has been enclosed with a glazed facade, and a multi-story, abstract mural has been painted on the McKenny Street façade of the addition.

Projected Development Site 2 is bounded by Furman Street to the west, Doughty Street to the north, Columbia Heights to the east, and Squibb Park to the south. Lots 1 and 12 on Block 208 are not currently developed. Block 208, Lot 2 is developed with four buildings: 30 Columbia Heights, 50 Columbia Heights, 58 Columbia Heights, and 55 Furman Street. 30 Columbia Heights is a 13-story, 141-foot-tall concrete building originally constructed as a factory.[2] 30 Columbia Heights is connected to 25 Columbia Heights by a two-story skybridge over Columbia Heights. There is a "Welcome" rooftop illuminated sign above the 30 Columbia Heights building, which is visible from the Manhattan waterfront and from the Brooklyn Bridge. The northwestern corner of the building on Furman Street includes a recently constructed external four-level staircase with viewing platforms and terraces, replacing a former loading area with a cantilevered roof. Along the Columbia Heights frontage at the southern end of the building, there is an entry plaza with landscaping.

50 Columbia Heights is a 4-story (55-foot-tall) red brick building located directly south of the 30 Columbia Heights building. It is connected on its south façade to 58 Columbia Heights, a 5-story (55-foot-tall) red brick building. An elevator shaft addition, enclosed in black metal panels, extends from the southern façade of the building, and an abstract mural has been painted on the upper floors of the southern façade. A narrow rear extension from the 30

[1] Height in stories includes a cellar level that is at grade on Doughty Street and partially below grade on Vine Street. Height in feet does not include rooftop mechanical bulkhead.

[2] Height in feet does not include rooftop mechanical bulkhead.



Lot Coverage in Study Area



Built FAR in Study Area

Columbia Heights building connects it to 50 and 58 Columbia Heights and to 55 Furman Street.

55 Furman Street is a four-story red brick former manufacturing building located directly west of 50 Columbia Heights. At the southwestern corner of the 30-58 Columbia Heights parcel is an undeveloped area, enclosed with chain link fencing along Furman Street, with a terraced open space extending from the rear of 58 Columbia Heights. Due to the significant slope downward from Columbia Heights to Furman Street (see discussion below), the 55 Furman building, which is directly west of the 50 Columbia Heights building, appears several stories shorter than that building from Furman Street.

See **Figures H-5 through H-8** for views of the Development Site buildings.

STUDY AREA

Streets and Streetscape

The study area has a generally rectilinear street grid east of the Brooklyn-Queens Expressway (BQE), which curves through the study area on an arc from the southwest to the northeast. The Brooklyn Bridge approach and Old Fulton Street extend through the northern portion of the study area at a diagonal; together with the BQE, these transportation elements create irregularly shaped blocks as they intersect the grid. The area on the west side of Furman Street and the area on the east side of Furman Street south of Doughty Street are both continuous, not subdivided into blocks. The BQE, Brooklyn Bridge, and Old Fulton Street are the primary thoroughfares in the study area (see **Figures H-1 and H-2**).

The BQE is a 12-mile-long segment of Interstate 278 (I-278) located between the Hugh L. Carey Tunnel in Brooklyn and the Grand Central Parkway in Queens. Within the northern portion of the study area, the BQE is an elevated highway that passes above city streets, parkland, and transportation right-of-way; it starts coming to grade south of Old Fulton Street and extends under Columbia Heights at Middagh Street. It continues south as a triple cantilever below the Brooklyn Heights Promenade, parallel with the alignment of Furman Street, outside the study area (see View 11 of **Figure H-8**). The Brooklyn Bridge is a cable-stayed suspension bridge that extends over the East River, connecting Manhattan and Brooklyn and carrying pedestrian, bicycle, and vehicular traffic. The bridge approach within the study area is supported by stone arches, with metal bridges extending above surrounding streets. The arch openings are filled with stone and include small windows. The elevated BQE passes under the Brooklyn Bridge approach near Old Fulton Street. The Brooklyn Bridge and BQE are both historic resources, as detailed in Attachment G, “Historic and Cultural Resources.” Both are also defining built features in the study area, and both physically and visually divide the study area. The bridge and expressway also carry heavy vehicular traffic through the study area. In addition, the Brooklyn Bridge carries heavy pedestrian and bicycle traffic.

Old Fulton Street roughly parallels the alignment of the Brooklyn Bridge approach west of Henry Street and extends under the BQE near Hicks Street (see View 12 of **Figure H-8**). The other streets within the study area are generally narrow (50 feet wide) and carry one-way traffic, with the exception of Furman Street and Front Street, which carry two-way traffic. Most of the one-way streets also provide one lane of curbside parking. Some of the streets in the study area retain Belgian block paving, including Elizabeth Place between Old Fulton Street



Development Site buildings, view north on Columbia Heights **1**



25 Columbia Heights, view northeast from Columbia Heights at Vine Street **2**



25 Columbia Heights, eastern addition, view northeast from Vine Street **3**

Development Site Photographs

Figure H-5



25 Columbia Heights, eastern addition, view southwest from Old Fulton Street **4**



30 Columbia Heights, view northwest from Columbia Heights and Vine Street **5**



30 Columbia Heights, view southeast from Doughty and Furman Streets **6**

Development Site Photographs

Figure H-6



30 Columbia Heights and 55 Furman Street, view northeast from Furman Street **7**



50 Columbia Heights, view from Columbia Heights **8**



58 Columbia Heights, view from Columbia Heights **9**

Development Site Photographs

Figure H-7



View of Development Site, looking north from Squibb Park **10**



View south to BQE from Columbia Heights near Cranberry Street **11**



View west on Old Fulton Street from near Henry Street **12**

Development Site and Study Area Photographs

and Doughty Street, Water Street north of Old Fulton Street, and Dock Street between Water and Front Streets (see View 13 of **Figure H-9**).

There are no subway stations within the study area. There is one bus route through the area, the B25, which extends along Old Fulton Street and loops around Water and Front Streets. There is an NYC Ferry stop for the East River and South Brooklyn routes at the pier within Brooklyn Bridge Park, at the foot of Old Fulton Street (Fulton Ferry Landing). There are protected bicycle routes through Brooklyn Bridge Park and across the Brooklyn Bridge, and conventional bicycle lanes on Old Fulton, Henry, Front, and York Streets within the study area. There are also Citi Bike stations on Old Fulton Street near Brooklyn Bridge Park, just south of Squibb Park on Columbia Heights, and on Dock Street north of Front Street (see view 14 of **Figure H-9**).

Pedestrian activity is concentrated along the Old Fulton Street corridor, near the waterfront, and within Brooklyn Bridge Park. Street furniture in the study area includes standard cobra-head streetlamps, bus stop signs, fire hydrants, garbage cans, and mailboxes meters. There are metal bollards along the edge of Fulton Ferry Landing at the base of Old Fulton Street, and food carts at various locations in the study area, including along Columbia Heights and Old Fulton Street. The north side of the Old Fulton Street roadway between Front and Water Streets has also been closed off with large planters to provide roadway cafes (see view 15 of **Figure H-9**), and on the south side of Old Fulton Street at Everit Street (Columbia Heights) is an open seating area for an ice cream store housed in a one-story former auto repair building, set back from the street.

Natural Features and Open Space

The topography of the study area includes steep slopes, with the lowest elevations near the waterfront and the highest elevations in the Brooklyn Heights neighborhood east of the BQE. Columbia Heights rises in elevation from Old Fulton Street toward Squibb Park, where it meets the higher elevation of the Brooklyn Heights neighborhood. This creates an approximately two-story grade difference between the ground floors of the northern Development Site buildings and the southern end of the study area. This elevation change also creates a significant differential between Columbia Heights and Furman Street/Brooklyn Bridge Park, which pedestrians navigate via the Squibb Park Bridge that connects to the Brooklyn Bridge Park (see description below). Near Fulton Ferry Landing and the waterfront, the topography of the study area is generally flat. There is also varied, engineered topography within the Pier 1 area of Brooklyn Bridge Park (described below).

Natural features within the study area include the East River and a number of parks, most notably Brooklyn Bridge Park. Brooklyn Bridge Park is approximately 21.38 acres in size and extends over 1.3 miles along the Brooklyn waterfront, continuing north and south of the study area. Within the study area, the park includes a playground, a waterfront esplanade with bench seating, wetlands, a salt marsh, and lawns (the Harbor View Lawn and Bridge View Lawn) on Pier 1. This area can be reached via the Squibb Park Bridge extending over Furman Street (see view 16 of **Figure H-10**). Also located on Pier 1 is the Granite Prospect, a set of steps near the water built from granite stones salvaged from the Roosevelt Island Bridge reconstruction, and the recently opened Pier 1 Pavilion, which includes three rounded stone structures accessible by sloping paths and wide stairways. The Pier 1 Pavilion includes a café and public restrooms. There are long stretches of continuous benches and extensive vegetation along the pedestrian paths through the park, which serve to limit views from these areas (see view 17 of **Figure H-10**). Fulton Ferry Landing—the pier at the foot of Old Fulton



View south on Water Street, north of Old Fulton Street **13**



View northwest from Columbia Heights near Cranberry Street **14**



View east on Old Fulton Street near Water Street **15**

Study Area Photographs
Figure H-9



Squibb Park Bridge, view north on Furman Street **16**



Pier 1 in Brooklyn Bridge Park, view to inland development on Furman Street **17**



View east from Fulton Ferry Landing **18**

Study Area Photographs

Figure H-10

Street—is also part of Brooklyn Bridge Park and includes the former Fireboat House, a clapboard structure with a tower, which is now in use as an ice cream store (see view 18 of **Figure H-10**).

Squibb Park is located directly south of the Development Site between Furman Street and Columbia Heights. It is 0.63 acres in size and almost entirely comprised of paved surface, with a comfort station, edge plantings, and benches. It is reached via a switchback ramp from Columbia Heights (see view 19 of **Figure H-11**). As noted above, a metal bridge leads from the western edge of the park over Furman Street, connecting to Brooklyn Bridge Park. The park is raised above Furman Street by a stone retaining wall.

Directly east of the Projected Development Site 2 and south of the Projected Development Site 1 is the Hillside Dog Park, a 1.37-acre, sloping open space for dog activity (see view 20 of **Figure H-11**). The park also has picnic benches and mature trees.

Other parks and open spaces in the study area include the Harry Chapin Playground, the Poplar Street Community Garden, the Fruit Street Seating Area, and Anchorage Plaza. Harry Chapin Playground is located at the BQE and Middagh Street; it is a paved open space 0.30 acres in size that includes playground equipment and a spray shower. The Poplar Street Community Garden is a small community garden, part of the City's Green Thumb program, on a triangular site bounded by Poplar and Hicks Streets and the BQE (see view 21 of **Figure H-11**). The Fruit Street Seating Area connects Columbia Heights to the Brooklyn Heights Promenade, at the southern edge of the study area. It is 0.92 acres in size and includes benches, a cobblestone and paved walkway, and a fenced-off section of plants and trees. On the north side of the study area is Anchorage Plaza, a 2.2-acre open space extending along the south side of the Brooklyn Bridge approach between Prospect and Front Streets. This open space comprises grassy areas with mature trees.

There are extensive street trees within the Brooklyn Heights portion of the study area, east of the BQE, and more dispersed street trees within the remainder of the study area, outside of parks and open spaces.

Built Environment

Buildings in the study area are predominantly residential and commercial, with one institutional use (a school), one hotel, a police building (under the Brooklyn Bridge at Water and Dock Streets), and one auto body repair facility opposite the Projected Development Site 1 on Old Fulton Street. There are also two paved surface parking lots in the study area: one on the north side of Doughty Street opposite the Projected Development Site 1, and one on the north side of the block bounded by Old Fulton, Hicks, Henry, and Poplar Streets.

As detailed in Attachment G, "Historic and Cultural Resources," the majority of the study area is located within the Fulton Ferry Historic District (north of the Development Site) and the Brooklyn Heights Historic District (east of the BQE). The buildings within the Fulton Ferry Historic District generally include one- to four-story commercial and residential buildings built between 1830 and 1895, constructed primarily of brick; the nine-story, massive Romanesque Revival-style Eagle Warehouse just north of the 25 Columbia Heights building; and a few 20th century structures, including the clapboard former Fulton Ferry Fireboat House (described above) (see views 22 and 23 of **Figure H-12**). The buildings within the Brooklyn Heights Historic District generally include two- and three-story brick and wood frame rowhouses, converted carriage houses, and small apartment buildings (see views 24-26 of **Figures H-12 and H-13**). There are also taller buildings in the historic district just outside the



Squibb Park, ramp to Columbia Heights **19**



Hillside Dog Park, view northeast from Columbia Heights **20**



Poplar Street Community Garden, view northwest to the Development Site from Poplar **21**

Study Area Photographs

Figure H-11



View southeast from foot of Old Fulton Street **22**



View northeast from foot of Old Fulton Street, near Furman Street **23**



View west on Middagh Street west of Hicks Street **24**

Study Area Photographs

Figure H-12



West side of Willow Street, view southwest from near Middagh Street **25**



South side of Old Fulton Street between Henry and Hicks Streets, view to southeast **26**



View to 1 Hotel Brooklyn Bridge and Development Site from Pier 1 **27**

Study Area Photographs

Figure H-13

study area, including 11- and 12-story buildings at the northeast and southeast corners of Columbia Heights and Orange Street, respectively. Also within the historic district is Public School (P.S.) 8, the Emily Warren Roebling School, a four-story red brick school building on the east side of Hicks Street between Poplar and Middagh Streets. The school is roughly rectangular in plan and set back from the streetline behind landscaped beds with mature trees and a low metal fence. The lots within the Brooklyn Heights Historic District are small, and buildings typically cover the front of the lot, leaving the rear area (center of the block) open. Within the Fulton Ferry Historic District, lot sizes are more varied, and lot coverage is higher.

There are also new and taller buildings in the study area. These include the 1 Hotel Brooklyn Bridge and Pierhouse developments directly west of the Development Site on the west side of Furman Street. These are 10 stories tall, large in footprint and overall size (the Pierhouse development is approximately 346,796 sf), and modern in design and materials (glass and metal). They create a strong visual presence on Furman Street between Doughty Street and Orange Street (see views 27 and 28 of **Figures H-13 and H-14**). On the north side of the Brooklyn Bridge is the recently constructed 60 Water Street development, which is 17 stories tall and clad in glass (see view 29 of **Figure H-14**). Just outside of the study area are the Olympia DUMBO tower at 30 Front Street, which is 26 stories (approximately 373 feet) in height and was constructed in 2023, and the 27-story apartment building at 140 Cadman Plaza West, built in 1967 (see view 26 of **Figure H-13**, above).

VISUAL RESOURCES

DEVELOPMENT SITE

While the buildings on the Development Site have not been identified as visual resources, the rooftop sign on the 30 Columbia Heights building is notable in views from Fulton Ferry Landing and some portions of Pier 1 within Brooklyn Bridge Park; from the East River ferries; from the Brooklyn Bridge; and from the Lower Manhattan waterfront, particularly at night when illuminated (see view 30 of **Figure H-14**). The skybridge between 25 and 30 Columbia Heights is also notable in views north on Columbia Street from south of the Development Site (see view 1 of **Figure H-5**).

Views from the sidewalks adjacent to the Development Site include, on Furman Street, the Brooklyn-side anchorage of the Brooklyn Bridge, the clapboard former Fulton Ferry Fireboat House at Fulton Ferry Landing, and the One Manhattan Square tower in the distance in views north, and the Squibb Park Bridge in views south (see view 28 of **Figure H-14**). The recently-constructed 1 Hotel Brooklyn Bridge and Pierhouse developments are also visible on the west side of the street and limit views from Furman Street to Brooklyn Bridge Park on the west side of the buildings. On Columbia Heights, the Manhattan-side anchorage of the Manhattan Bridge and the span of the Brooklyn Bridge can be seen above the 25-30 Columbia Heights skybridge in views north. Doughty Street is a narrow street with constrained views in both directions; views east include the brick retaining wall of the BQE, with two levels of roadway above. Views west on Vine Street end at the 30 Columbia Heights building; views east on this street include the brick retaining wall of the BQE, with two levels of roadway above, and the upper floors of buildings in the Brooklyn Heights Historic District on the far side of the BQE (see Attachment G, “Historic and Cultural Resources”). Views on the short length of McKenny Street include the BQE retaining wall to the south, and the



View north on Furman Street to the Pierhouse and 1 Hotel Brooklyn Bridge **28**



View east on Front Street at Old Fulton Street, to 60 Water Street and Olympia DUMBO developments **29**



View southeast from East River ferry to Development Site **30**

Study Area Photographs

Figure H-14

Brooklyn Bridge approach and the Olympia DUMBO (30 Front Street) development to the north.

STUDY AREA

The most notable views and view corridors within the study area are from the waterfront, including the Fulton Ferry Landing area, Columbia Heights south of Squibb Park, and along Old Fulton Street. The view corridor of Old Fulton Street is wide and long. Views west along the street include the Brooklyn-side anchorage and approach of the Brooklyn Bridge; the BQE, which extends under the Brooklyn Bridge approach and above the street on a metal bridge; and the towers of Lower Manhattan in the background, as well as the Fulton Ferry Fireboat House in views west of the BQE (see view 12 of **Figure H-8**, above). Views east along the street include the Brooklyn Bridge span and approach; the 25 and 30 Columbia Heights and Eagle Warehouse buildings, which appear similar in scale from this perspective; and the Olympia DUMBO (30 Front Street) tower in the background.

On Columbia Heights south of Squibb Park, the street extends above the BQE and provides elevated, extensive views south of the tip of Lower Manhattan as well as Governors Island and the Statue of Liberty in the far distance. From Fulton Ferry Landing, long views are available in each direction. Views from this location include Lower Manhattan; almost the entire span of the Brooklyn Bridge; and the Manhattan Bridge and the One Manhattan Square tower in the distance, as well as the buildings of the Fulton Ferry Historic District in the foreground and the Development Site buildings, the Eagle Warehouse, and the 1 Hotel Brooklyn Bridge development all in close proximity to the southeast.

Views on Furman Street and other portions of Columbia Heights are as detailed above. The elevated vantage points of Squibb Park and the Squibb Park Bridge also provide long views along the Furman Street view corridor.

Some views within the study area are limited by the area's street pattern. Views east on Doughty and Vine Streets end with the BQE retaining wall and roadways, as described above. Views south on Elizabeth Place end with the 25 Columbia Heights building, and views north on the street end with the buildings on the north side of Old Fulton Street. Views west on Poplar Street also end with the BQE retaining wall; however, the upper floors of the Development Site buildings can be seen above the retaining wall in these views (see **Figure H-15**). Views north on Willow Street are of the Development Site buildings, and views north on Hicks Streets end with the BQE retaining wall. Middagh Street ends at the BQE, which is below the height of the street at this location; a pedestrian path extends west to Columbia Heights, along the northern edge of the Henry Chapin Playground (described above). Views south along these streets, as well as views east on Poplar, Middagh, and Cranberry Streets, are of the low-scale Brooklyn Heights Historic District, with extensive street tree canopy limiting the views.

Views west from Cranberry Street near Columbia Heights are above the BQE triple cantilever and include the Lower Manhattan skyline as well as the southern portion of the Pierhouse development, described above. Views east and west along Front Street include the Brooklyn Bridge span, which extends above the street. Views west also include the massive Eagle Warehouse, with a segment of the 25 Columbia Heights building visible behind it; views east also include the glass-clad 60 Water Street development and the Olympia DUMBO (30 Front Street) tower in the background (see **Figure H-14**, above).



View northwest on Poplar Street toward Development Site **31**



View west to Manhattan from Fulton Ferry Landing **32**



View west from Brooklyn Bridge approach **33**

Study Area Photographs

Figure H-15

As described above, the varied topography and extensive vegetation along the pedestrian paths through the Pier 1 portion of Brooklyn Bridge Park, as well as the 1 Hotel Brooklyn Bridge and Pierhouse developments on the west side of Furman Street, limit most views upland to the Development Site from the portion of the park that falls within the study area. However, there are extensive views of Manhattan and the Brooklyn and Manhattan Bridges from the waterfront esplanade on the pier, just outside the study area boundary (see **Figure H-15**). From the elevated perspective of the Brooklyn Bridge, views west from the Brooklyn Bridge approach also include the towers of Lower Manhattan and nearby buildings within the Brooklyn Heights Historic District, which appear similar in height to the Development Site buildings in these views (see **Figure H-21**).

D. THE FUTURE WITHOUT THE PROPOSED ACTIONS

DEVELOPMENT SITE

As described in Attachment A, "Project Description," in the No Action condition, the Project Area would be retenanted with complying commercial uses in the existing buildings. These uses are permitted under existing zoning; no discretionary actions would be required, and no residential development would occur. Therefore, no change to urban design or visual resources would occur.

STUDY AREA

As described in Attachment B, "Land Use, Zoning, and Public Policy," there are four projects within the study area anticipated to be completed by the project's build year (2029), all located within the Brooklyn Heights Historic District southeast of the Development Site at 11 Cranberry Street, 12 Middagh Street, 24 Middagh Street, and 29 Willow Street. The projects at 11 Cranberry Street, 12 Middagh Street, and 24 Middagh Street will convert existing two- and three-family residences to single-family use, and the project at 29 Willow Street will convert an existing five-story, multi-family residential building to single-family use.

Overall, in the No Action condition, given that the background projects would convert existing buildings but not change the residential use of the buildings or add new construction, the study area will retain its existing urban design character, including its streets and streetscape, natural features and open space, the built environment, and visual resources.

E. THE FUTURE WITH THE PROPOSED ACTIONS

URBAN DESIGN

PROJECT AREA

Under the Proposed Actions, Projected Development Site 1 would be rezoned from the existing M2-1 district—which allows industrial and commercial use at a maximum FAR of 2.0, and does not allow residential use or most community facility uses—to a paired M1-5A/R10A zoning district, and 30 Columbia Heights would be rezoned from the existing M2-1 district to a paired M1-5A/R8A zoning district. The proposed M1-5A/R10A(MX) district would allow maximum FARs of 12.0 for residential use and 6.5 for commercial use, with a maximum base height of 155 feet and a maximum building height of 293 feet (increased from the standard maximum building height of 235 feet, since the zoning lot has a lot area of more than 20,000



No Action



With Action

Permitted base height: 155'

Permitted building height: 235'/ 205'

Permitted building height: 293'/ 256' (25% increase for lots ≥ 20,000 sf)

No Action/With Action Comparison,
View Southeast from East River Ferry

2.3.26



No Action



With Action

Permitted base height: 155'

Permitted building height: 235'/ 205'

Permitted building height: 293'/ 256' (25% increase for lots ≥ 20,000 sf)

No Action/With Action Comparison,
View Southeast from Old Fulton Street



No Action



With Action

Permitted base height: 155'

Permitted building height: 235'

Permitted building height: 293' (25% increase for lots ≥ 20,000 sf)

No Action/With Action Comparison,
View West from Old Fulton Street near BQE



No Action



With Action

Permitted base height: 155'

Permitted building height: 235'

Permitted building height: 293' (25% increase for lots ≥ 20,000 sf)

No Action/With Action Comparison,
View North on Columbia Heights

2.3.26



No Action



With Action

Permitted base height: 155'

Permitted building height: 235'/ 205'

Permitted building height: 293'/ 256' (25% increase for lots ≥ 20,000 sf)

No Action/With Action Comparison,
View Northwest from Brooklyn Heights Promenade



No Action



With Action

Permitted base height: 155'

Permitted building height: 235'/ 205'

Permitted building height: 293'/ 256' (25% increase for lots ≥ 20,000 sf)

No Action/With Action Comparison,
View West from Brooklyn Bridge Approach

sf). The proposed M1-5A/R8A(MX) district for 30 Columbia Heights would allow maximum FARs of 7.2 for residential use and 6.5 for commercial use, with a maximum base height of 155 feet and a maximum building height of 256 feet (increased from the standard maximum building height of 205 feet, since the zoning lot has a lot area of more than 20,000 sf). The proposed MX District would allow an appropriate mix of light-industrial, commercial, and residential use at the Project Area.

The proposed zoning actions would allow for residential, commercial, and community facility uses at the Project Area and would result in the adaptive reuse and enlargement of the existing 25 and 30 Columbia Heights buildings on the Project Area. As described in Attachment A, "Project Description," since the Proposed Development would not utilize all the floor area permitted under the proposed rezoning on 30 Columbia Heights, to present a conservative analysis, a RWCDS was developed assuming full utilization of allowable FAR and building heights under the proposed zoning districts, with building heights that reflect the achievement of full FAR utilization with efficient and practicable floorplates that could reasonably be built.

Under the RWCDS, Projected Development Site 1 would be enlarged from 12 stories (131 feet) to a maximum height of approximately 17 stories (210 feet), an increase of approximately 79 feet. The upper floors of the existing building would be removed and replaced as part of the enlargement. The enlarged building would contain approximately 460,570 gsf. The building would be occupied by 392 dwelling units, approximately 14,850 gsf of commercial and/or community facility use, and accessory parking.

As described in Attachment A, "Project Description," the Proposed Development would not utilize all of the floor area permitted under the proposed rezoning for the 30 Columbia Heights parcel; in comparison, the RWCDS assumes full utilization of allowable FAR on this parcel. Under the RWCDS, the 30 Columbia Heights building would be enlarged from 13 stories (141 feet) to 19 stories (205 feet), an increase of approximately 64 feet. The upper floors of this portion of the existing building would be removed and replaced as part of the enlargement. The enlarged building would result in an increase of approximately 145,890 gsf. The building would be occupied by 324 dwelling units, approximately 171,320 gsf commercial use, and accessory parking.

The skybridge between 25 and 30 Columbia Heights would be removed as part of the Proposed Development. The footprints of the Project Area buildings and the lot coverage of the two parcels would not change with the Proposed Actions.

The existing envelope of 50 Columbia Heights, 58 Columbia Heights, and 55 Furman Street would not be altered and would continue to be occupied with commercial uses, as in the No Action condition.

Like the No Action condition, the Proposed Actions would bring active uses to the Project Area buildings, enhancing the visual character of the Project Area, and would introduce increased pedestrian activity that would enliven the adjacent sidewalks and improve the pedestrian experience. The Proposed Actions would allow for the development of residential use on the Project Area, which would be consistent with existing uses in the surrounding area.

See Attachment A, "Project Description" **Figures 4a and 4b** for the proposed massing and site plan, and Attachment A, "Project Description" **Figures 6a and 6b** for the RWCDS massing and site plan. **Figures H-16 through H-21** show comparative No Action and With Action illustrative views of the Project Area from various vantage points within the study area.

STUDY AREA

With the Proposed Actions, the building enlargements on the Project Area would be constructed on existing blocks and would not entail any changes to streets or street patterns, public open space, or natural features in the study area. No new buildings would be created on the Project Area, nor would the footprints of the Project Area buildings change; therefore, the With Action condition would be consistent with the urban design character of the existing/No Action conditions.

As described above, with the RWCDS, the two existing buildings at 25 and 30 Columbia Heights would be enlarged and their heights would increase by 79 and 64 feet (to 210 feet and 205 feet), respectively. However, the urban design and visual character of the study area already includes a mix of older and newer, shorter and taller buildings. While the study area includes multiple historic districts (see Attachment G, "Historic and Cultural Resources," it also includes a number of new and taller buildings. These include the 10-story-tall 1 Hotel Brooklyn Bridge and Pierhouse developments directly west of the Project Area on the west side of Furman Street and the recently constructed, 17-story, glass-clad 60 Water Street development on the north side of the Brooklyn Bridge. Just outside of the study area are the Olympia DUMBO tower at 30 Front Street, which is 26 stories (approximately 373 feet) in height and was constructed in 2023, and the 27-story apartment building at 140 Cadman Plaza West, built in 1967. The existing low-scale, red brick buildings at 50 and 58 Columbia Heights and 55 Furman Street would not be altered with the Proposed Actions, and the lower levels and oldest portions of the 25 and 30 Columbia Heights buildings would be generally consistent with their current appearance, serving to moderate the change to the existing visual context, particularly from the pedestrian perspective.

Like the No Action condition, the Proposed Actions would bring active uses to the Project Area buildings, enhancing the vitality, walkability, and visual character of the study area. These changes would add street-level visual interest and introduce increased pedestrian activity that would enliven the sidewalks in the study area and improve the pedestrian experience. The Proposed Actions would not change lot coverage on the Project Area or in the study area. Therefore, the Proposed Actions would not result in a significant adverse impact to urban design in the study area.

VISUAL RESOURCES

PROJECT AREA

As detailed above, the buildings on the Project Area have not been identified as visual resources. Therefore, the proposed enlargements to the 25 and 30 Columbia Heights buildings would not have a significant adverse impact to visual resources on the Project Area. The rooftop sign on the 30 Columbia Heights building would remain, and would remain visible in views from Fulton Ferry Landing, some portions of Pier 1 within Brooklyn Bridge Park, the East River ferry, the Brooklyn Bridge, and the Lower Manhattan waterfront, particularly at night when illuminated (see **Figure H-21**).

The skybridge between 25 and 30 Columbia Heights, which is notable in views north on Columbia Street from south of the Project Area, would be removed in the With Action condition; however, the proposed removal of the skybridge would make the Brooklyn Bridge span and the Manhattan Bridge Manhattan-side anchorage more visible in the Columbia Heights northern view corridor (see **Figure H-18**).

The building enlargements would occur at the upper floors of 25 and 30 Columbia Heights; therefore, existing views from the sidewalks adjacent to the Development Site would remain as described under the existing/No Action conditions.

STUDY AREA

Because the proposed building enlargements would occur on existing lots, they would not obstruct any view corridors. As detailed above, the most notable views and view corridors within the study area are from the waterfront, including the Fulton Ferry Landing area, Columbia Heights south of Squibb Park, and along Old Fulton Street. Along Old Fulton Street, the proposed enlargement on Projected Development Site 1 would be most notable in views west along Old Fulton Street just west of the BQE crossing, as the eastern side of the building is most visible from this perspective (see **Figure H-17**). Similarly, the proposed enlargement on Projected Development Site 1 would be prominent in views west from the Brooklyn Bridge approach (see **Figure H-20**). While the proposed enlargement would become part of the view west from these locations, the view would continue to include the Brooklyn-side anchorage and approach of the Brooklyn Bridge and the towers of Lower Manhattan in the background. Views east along the street would continue to include the Brooklyn Bridge span and approach; the 25 and 30 Columbia Heights and Eagle Warehouse buildings; and the Olympia DUMBO (30 Front Street) tower in the background, which would provide perspective on the additional height on the 25-30 Columbia Heights buildings.

Views south on Columbia Heights south of Squibb Park to Lower Manhattan, Governors Island, and the Statue of Liberty in the far distance would not be altered with the Proposed Actions. Similarly, views south along streets in the Brooklyn Heights Historic District would not be altered. Views from Fulton Ferry Landing and approaching ferries would continue to include Lower Manhattan, the Brooklyn Bridge span and anchorages, and the Manhattan Bridge and the One Manhattan Square tower in the distance, as well as the buildings of the Fulton Ferry Historic District in the foreground and the Project Area buildings, the Eagle Warehouse, and the 1 Hotel Brooklyn Bridge development all in close proximity to the southeast (see **Figure H-21**).

The elevated vantage points of Squibb Park and the Squibb Park Bridge, as well as more distant views from the north end of the Brooklyn Heights promenade, would continue to provide long views along the Furman Street view corridor, along with views of the new upper levels at the 25 and 30 Columbia Heights buildings (see **Figure H-19**). Views west on Poplar Street and north on Willow Street would continue to include the buildings on the Project Area and would now also include the enlargements visible above the existing lower floors.

Views west from Cranberry Street near Columbia Heights would continue to include the Lower Manhattan skyline as well as the southern portion of the Pierhouse development, as described above. The additional floors above 25 Columbia Heights would be somewhat visible behind the Eagle Warehouse in views west along Front Street.

Overall, the Proposed Actions would not be expected to result in any significant adverse impacts to urban design or visual resources on the Project Area or in the study area, and therefore, no further analysis is warranted. ✷

Attachment I: Hazardous Materials

A. INTRODUCTION

Following the guidelines of the 2025 *City Environmental Quality Review (CEQR) Technical Manual,* this attachment addresses the potential for the presence of hazardous materials resulting from previous and existing uses at 25-30 Columbia Heights in Brooklyn, NY, and in the surrounding area, and assesses potential risks related to any such hazardous materials with respect to the proposed rezoning and redevelopment.

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project") at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2") (together, the "Project Area"). As described in Attachment A, "Project Description," a Reasonable Worst-Case Development Scenario (RWCDS) was developed that includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

This assessment is based on a *Phase I Environmental Site Assessment* (ESA) prepared by AKRF, Inc. (AKRF) in September 2025 for the Project Area. The ESA included the findings of a reconnaissance of the Project Area and an evaluation of readily available historical information, selected environmental databases, and electronic records (for the Project Area and in the vicinity), in accordance with American Society for Testing and Materials (ASTM) Standard E1527-21.

PRINCIPAL CONCLUSIONS

In the future with the Proposed Actions (the "With Action" condition), two of the existing buildings in the Project Area would be partially converted to residential use and enlarged from 12 and 13 stories to 17 and 14 stories, respectively. Redevelopment would involve excavation of subsurface materials at select locations within both buildings to allow for construction of new foundation elements to support the proposed building enlargements. Although these activities could temporarily increase pathways for human exposure to any contaminated materials present in the existing structure or the subsurface by on-site workers, exposure to them and the surrounding community would be mitigated by incorporating the following into the Proposed Development:

- In a letter to DCP dated October 28, 2025, DEP requested that a Subsurface (Phase II) Investigation be performed based on the Phase I ESA findings and in accordance with a DEP-approved sampling protocol. The DEP letter is provided in EAS Appendix 1, "Agency Correspondence".

- Following completion of the Phase II investigation, an E-Designation for hazardous materials would be placed on the Project Area tax lots to ensure that the applicant completes the remediation in accordance with the requirements of the New York City Mayor's Office of Environmental Remediation (OER). The E-designation requirements for hazardous materials are as follows:
  - Task 1 - Sampling Protocol: The applicant submits to New York City Office of Environmental Remediation (OER), for review and approval, a Phase I ESA of the site along with a soil, groundwater, and soil vapor testing protocol, including a description of methods and a site map with all sampling locations clearly and precisely represented. If site sampling is necessary, no sampling should begin until written approval of a protocol is received from OER. The number and location of samples should be selected to adequately characterize the site, specific sources of suspected contamination (i.e., petroleum-based contamination and non-petroleum-based contamination), and the remainder of the site's condition. The characterization should be complete enough to determine what remediation strategy (if any) is necessary after the review of sampling data. Guidelines and criteria for selecting sampling locations and collecting samples are provided by OER upon request.
  - Task 2 - Remediation Determination and Protocol: A written report with findings and a summary of the data must be submitted to OER after completion of the testing phase and laboratory analysis for review and approval. After receiving such results, a determination is made by OER if the results indicate that remediation is necessary. If OER determines that no remediation is necessary, written notice shall be given by OER.
  - If remediation is indicated from test results, a proposed remediation plan must be submitted to OER for review and approval. The applicant must complete such remediation as determined necessary by OER. The applicant should then provide proper documentation that the work has been satisfactorily completed.
  - A CHASP should be submitted to OER and would be implemented during excavation and construction activities to protect workers and the community from potentially significant adverse impacts associated with contaminated soil, groundwater, and/or soil vapor. This plan would be submitted to OER prior to implementation.

B. EXISTING CONDITIONS

PROJECT AREA PHASE I ESA

The Project Area consists of the buildings located at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12, "Projected Development Site 2"), and is developed with multi-story commercial office buildings. The Project Area is located in a commercial and industrial area.

The ESA identified the following Recognized Environmental Conditions (RECs)[1] at the Project Area:

- A review of historical Sanborn maps and the New York City Department of Buildings (DOB) database identified that the Project Area was developed prior to 1887 for industrial, light-

[1] Per the ASTM Standard, RECs indicate *"the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property."*

industrial, and commercial uses, including pharmaceutical fabrication, various factory uses, foundry fabrication, coal storage, machine shops, carpenter shops, iron works and casting, coffee polishing, and printing. These historical uses may have affected the subsurface at the Project Area.

- The Project Area was listed in the federal Resource Conservation and Recovery Act (RCRA) generator/non-generator, Facility Index System (FINDS), Enforcement and Compliance History Online (ECHO), and Integrated Compliance Information System (ICIS) databases related to the generation and/or disposal of halogenated and non-halogenated solvents between at least 1999 and 2007. Generation and/or disposal of hazardous chemicals may have affected the subsurface at the Project Area.
- A review of historical Sanborn maps identified automotive, industrial, manufacturing, and commercial uses on adjacent and surrounding properties between at least 1887 and 2007, including, but not limited to, a cigar factory, shoe factory, plumbing supplies factory, lead pipe factory, brass foundry, cracker bakery, electrical appliance factory, milling company with engine room (1887); wire manufacturing (1915); National Cold Storage Facility with Internal Energy Plant, United States Trucking Corporation Garage (1938); and a filling station and automobile repair facility (1977). These historical uses may have affected the subsurface at the Project Area.

The ESA identified the following Business Environmental Risks (BER)[2] at the Project Area:

- A review of the New York State Department of Environmental Conservation (DEC) Petroleum Bulk Storage (PBS) database, along with a review of documents provided by the New York City Department of Environmental Protection (DEP), identified above-ground petroleum storage within 30 Columbia Heights. At the time of the Phase I ESA, petroleum storage at 30 Columbia Heights included three 20,000-gallon No. 2 fuel oil aboveground storage tanks (ASTs) within the cellar level, and one 300-gallon No. 2 fuel oil AST on the roof. The property reconnaissance indicated that the ASTs were in good condition, and no active leaks or spills were observed in the cellar or on the roof.
- Based on the age of the current and former Project Area buildings, asbestos containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs) are likely present within building components and may also be present in buried fill material at the site.

C. THE FUTURE WITHOUT THE PROPOSED ACTIONS

As described in Attachment A, “Project Description,” in the future without the Proposed Actions (the “No Action” condition), the Project Area would be retenanted with complying commercial uses in the existing buildings. These uses are permitted under existing zoning; no discretionary actions would be required, and no residential development would occur. Legal requirements, such as those relating to petroleum storage tank maintenance and handling and disposal of surplus chemicals, would continue to be applicable.

[2] Per the ASTM Standard, a BER indicates *“a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated by the Standard.”*

D. THE FUTURE WITH THE PROPOSED ACTIONS

In the With Action condition, excavation would likely be required for construction of new foundation elements to support the proposed building enlargements. Although these activities could temporarily increase pathways for human exposure to any contaminated materials present in the existing structures or the subsurface, impacts would be avoided by incorporating the following into the Proposed Development:

- In a letter to DCP dated October 28, 2025, DEP requested that a Subsurface (Phase II) Investigation be performed based on the Phase I ESA findings and in accordance with a DEP-approved sampling protocol. The DEP letter is provided in EAS Appendix 1, "Agency Correspondence".
- Following completion of the Phase II investigation, an E-Designation for hazardous materials would be placed on the Project Area tax lots to ensure that the applicant completes the remediation in accordance with the requirements of the New York City Mayor's Office of Environmental Remediation (OER). The E-designation requirements for hazardous materials are as follows:
  - Task 1 - Sampling Protocol: The applicant submits to New York City Office of Environmental Remediation (OER), for review and approval, a Phase I ESA of the site along with a soil, groundwater, and soil vapor testing protocol, including a description of methods and a site map with all sampling locations clearly and precisely represented. If site sampling is necessary, no sampling should begin until written approval of a protocol is received from OER. The number and location of samples should be selected to adequately characterize the site, specific sources of suspected contamination (i.e., petroleum-based contamination and non-petroleum-based contamination), and the remainder of the site's condition. The characterization should be complete enough to determine what remediation strategy (if any) is necessary after the review of sampling data. Guidelines and criteria for selecting sampling locations and collecting samples are provided by OER upon request.
  - Task 2 - Remediation Determination and Protocol: A written report with findings and a summary of the data must be submitted to OER after completion of the testing phase and laboratory analysis for review and approval. After receiving such results, a determination is made by OER if the results indicate that remediation is necessary. If OER determines that no remediation is necessary, written notice shall be given by OER.
  - If remediation is indicated from test results, a proposed remediation plan must be submitted to OER for review and approval. The applicant must complete such remediation as determined necessary by OER. The applicant should then provide proper documentation that the work has been satisfactorily completed.
  - A CHASP should be submitted to OER and would be implemented during excavation and construction activities to protect workers and the community from potentially significant adverse impacts associated with contaminated soil, groundwater, and/or soil vapor. This plan would be submitted to OER prior to implementation.
- During any redevelopment activities within the Project Area resulting in soil disturbance activities, any evidence of a petroleum spill would be reported to DEC and/or other regulatory agencies and addressed in accordance with applicable requirements. If any underground storage tanks (USTs) are encountered, they would be properly assessed, closed, and removed in accordance with state and local regulations. Transportation of material leaving the

site for off-site disposal would be in accordance with federal, state, and local requirements covering the licensing of haulers and trucks, placarding, truck routes, manifesting, etc.

- If dewatering is required during implementation of the Proposed Development, water should be discharged in accordance with DEP requirements.
- Following the completion of soil disturbance, submission of an RCR to OER for review and approval would be required prior to obtaining Certificates of Occupancy for the new uses. The RCR would document the proper performance of all procedures required by the RAP and CHASP.
- An asbestos survey would be conducted within the Project Area buildings and any ACM that would be disturbed would be removed and disposed of prior to demolition in accordance with local, state, and federal requirements.
- Any activities with the potential to disturb LBP within the Project Area would be performed in accordance with applicable requirements (including federal Occupational Safety and Health Administration [OSHA] regulation 29 CFR 1926.62—*Lead Exposure in Construction*).
- Unless there is labeling or test data indicating that suspect PCB-containing electrical equipment, hydraulic equipment, and fluorescent lighting fixtures do not contain PCBs, and that fluorescent lighting bulbs do not contain mercury, if disposal is required, it would be conducted in accordance with applicable federal, state and local requirements.
- Applicable regulatory requirements would be followed during implementation of the Proposed Actions (e.g., for properly disposing of any trash, excess chemicals and soil, and for following DEP sewer discharge requirements if dewatering is required).

With these measures included as part of the Proposed Development, no significant adverse impacts related to hazardous materials would occur during redevelopment of the Project Area. ✶

Attachment J: Water and Sewer Infrastructure

A. INTRODUCTION

This chapter assesses the potential for the Proposed Actions to result in significant adverse impacts on New York City's water supply and wastewater and stormwater conveyance, management, and treatment infrastructure in accordance with the guidance of the 2025 *City Environmental Quality Review (CEQR) Technical Manual*. New York City's water and sewer network is fundamental to the operation, health, safety, and quality of life of the City and its surrounding environment, and it must be sized to fit the City's users and surface conditions to function adequately. Ensuring these systems have adequate capacity to accommodate land use or density changes and new development is critical to avoiding environmental and health problems such as sewer back-ups, street flooding, or pressure reductions.

As described in the Environmental Assessment Statement (EAS) Full Form, 25-30 Columbia Heights (Brooklyn), LLC (the Applicant) is seeking a zoning map amendment to rezone an existing M2-1 district to M1-5A/R10A and M1-5A/R8A districts, and a zoning text amendment to establish a Special Mixed-Use (MX) District and amend Appendix F of the Zoning Resolution to establish a Mandatory Inclusionary Housing (MIH) area (the "Proposed Actions"). The Proposed Actions would facilitate a proposal by the Applicant to enlarge and partially convert existing buildings to residential use (the "Proposed Development" or the "Proposed Project") at 25 Columbia Heights (Block 204, Lot 1, "Projected Development Site 1") and 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12"Projected Development Site 2") (together, the "Project Area"). As described in Attachment A, "Project Description," a Reasonable Worst-Case Development Scenario (RWCDS) was developed that includes approximately 1,005,480 gross square feet (gsf) of total development, consisting of 758,300 gsf of new residential space, 716 dwelling units (including 179 affordable units with the Applicant's preferred Option 1 of the MIH program), approximately 186,170 gsf of local retail and office space, and 188 parking spaces.

PRINCIPAL CONCLUSIONS

As outlined below, the Proposed Actions would result in increased flows to the City's combined sewer system that may be discharged as combined sewer overflow (CSO) during rain events. However, because of the available capacity at the Red Hook Wastewater Resource Recovery Facility (WRRF) and the incorporation of best management practices (BMPs) to comply with the Unified Stormwater Rule, the Proposed Actions would not result in significant adverse impacts to local water supply or wastewater and stormwater conveyance and treatment infrastructure.

B. METHODOLOGY

According to the *CEQR Technical Manual*, an analysis of a project's impact on the water supply system should be conducted only if a project would have exceptionally large demand for water (generally over 1 million gallons per day [gpd]), or if it is located in an area that experiences low water pressure (e.g., areas at the end of the water supply distribution system such as the

Rockaway Peninsula and Coney Island). The Proposed Actions do not meet any of these criteria, and therefore, an analysis of water supply is not warranted.[1]

The *CEQR Technical Manual* indicates that for wastewater and stormwater conveyance and treatment analyses, a preliminary assessment is warranted in Brooklyn if a project is located in a combined sewer area and would have an incremental increase above the future without the Proposed Actions (the "No Action" condition) of 400 residential units or 150,000 square feet (sf) of commercial, public facility, and institution and/or community facility space. Since the Project Area is located in a combined sewer area in Brooklyn and the Proposed Actions would exceed these thresholds, an assessment of wastewater and stormwater infrastructure is provided.

To assess the potential impacts of the Proposed Actions on water and sewer infrastructure, this chapter provides:

- A description of the existing water and sewer infrastructure serving the Project Area;
- A preliminary analysis that estimates water demand and sewage generation in the Project Area under existing and No Action conditions based on the use generation rates provided in the *CEQR Technical Manual*. The preliminary analysis also calculates stormwater runoff and sanitary flows using the New York City Department of Environmental Protection (DEP) Volume Calculation Matrix. The preliminary analysis then forecasts water demand and sewage and stormwater generation by the Proposed Actions based on *CEQR Technical Manual* guidelines; and
- An assessment, based on the preliminary analyses, of the effects of water demand and sewage and stormwater generation on the City's water and sewer infrastructure in the future with the Proposed Actions (the "With Action" condition), pursuant to *CEQR Technical Manual* guidelines.

C. EXISTING CONDITIONS

SEWER SYSTEM AND WASTEWATER TREATMENT

The Project Area is located within an area of Brooklyn that is served by a combined sewer system that collects both sanitary sewage and stormwater. In periods of dry weather, the combined sewers in the streets adjacent to the Project Area, which are sized to convey an amount of sanitary sewage based on the density levels permitted by the zoning regulations of the area, convey only sanitary sewage. The Project Area is served by combined sewers located along Doughty, Vine, Columbia Heights, and Furman Streets. From there, flow is conveyed to the west and north, to Regulator R-17, which is located at Furman Street and Old Fulton Street. Regulators are the structures that control the flow of sewage to interceptors, or larger sewers that connect the combined sewer system to the City's sewage treatment system. Regulator R-17 controls flow to an interceptor that runs along Furman Street and conveys sanitary sewage to the Red Hook WRRF, located in Vinegar Hill, Brooklyn.

At the Red Hook WRRF, wastewater is fully treated by physical and biological processes before it is discharged into the Lower East River. The quality of the treated wastewater (effluent) is regulated by a New York State Pollution Discharge Elimination System (SPDES) permit issued

[1] As shown in **Table J-3**, the Proposed Actions would result in a total water demand of 349,841 gpd, below the 1 million gpd threshold.

by the New York State Department of Environmental Conservation (DEC). The SPDES permit establishes limits for effluent parameters (i.e., suspended solids, fecal coliform bacteria, and other pollutants). Since the volume of flow to a WRRF affects the level of treatment a plant can provide, the maximum permitted capacity for the Red Hook WRRF is 60 million gallons per day (mgd). The average monthly flow over the past 12 months for which data is available[2] is 30 mgd, well below the maximum permitted level.

Most of New York City's sewers are combined sewers that collect both sanitary sewage and stormwater. In periods of dry weather, the combined sewers (sized to convey an amount of sanitary sewage that is based on density levels according to zoning regulations) convey only sanitary sewage. During and immediately after wet weather, the combined sewers can experience a much larger flow due to stormwater runoff collection. To control flooding at the Red Hook WRRF, regulators built into the system serve as relief valves, allowing only approximately twice the amount of design dry weather flow into the interceptors (larger sewers that convey wastewater to the WRRFs). The interceptors then take the allowable flow to the WRRFs, while the excess flow is discharged untreated to the nearest waterbody as CSO. As noted above, the Project Area is located within the drainage area of Regulator R-17; the Regulator connects to outfall RH-012, located on the East River at the northern end of Brooklyn Bridge Park.

SANITARY FLOWS

The Project Area contains two underutilized commercial buildings. Therefore, in order to present a conservative analysis, this assessment assumes that the existing 295,980-gsf building located on Projected Development Site 1 and the existing 399,020-gsf building located on Projected Development Site 2 do not currently generate any sanitary sewage.

STORMWATER FLOWS

The Project Area is approximately 101,720 sf (2.34 acres) and contains two underutilized commercial buildings. **Table J-1** summarizes the surfaces and surface areas within the Project Area, as well as the weighted runoff coefficient (the fraction of precipitation that becomes surface runoff for each surface type).

Table J-1
Existing Surface Coverage

Affected CSO Outfall	Surface Type	Roof	Pavement and Walkways	Other	Grass and Soft Scape	Total
RH-012	Area (percent)	79%	21%	0%	0%	**100%**
	Surface Area (sf)	80,024	21,696	0	0	**101,720**
	Runoff Coefficient[1]	1.00	0.85	0.85	0.20	**0.97**

Notes:
[1] The Runoff Coefficient is a weighted average. The calculations are based on the DEP Volume Calculation Matrix provided in the *CEQR Technical Manual*, retrieved November 2023.
Numbers may not sum to totals due to rounding.

[2] Twelve-month period through August 2024.

UNIFIED STORMWATER RULE

In February 2022, DEP adopted the Unified Stormwater Rule, which imposes on-site stormwater management requirements for new and redevelopment projects in combined sewer areas. The Unified Stormwater Rule was an update to the previous regulations (2012 Stormwater Rule) that reduced peak discharges to the City's sewer system during rain events by requiring greater on-site storage of stormwater runoff and slower release to the sewer system. Specifically, DEP adopted amendments to Chapters 31 and 19.1 of Title 15 of the Rules of the City of New York (RCNY) as part of the Unified Stormwater Rule.

Under the Chapter 31 amendments, the Unified Stormwater Rule increases the amount of stormwater required to be managed on-site and further restricts the release rates for all new and redevelopment projects that require a DEP House or Site Connection Proposal (SCP) Application. Additionally, under the Chapter 19.1 amendments, sites that disturb 20,000 sf or more of soil or increase impervious surfaces by 5,000 sf or more will also be required to manage the Water Quality Volume (WQv), currently defined as 1.5 inches over the lot area, using stormwater management practices (SMPs) dictated by DEP SMP hierarchies. DEP has developed hierarchies for both combined and separate sewer areas. The SMP hierarchies prioritize vegetated retention SMPs for both drainage areas with stormwater volume control and stormwater treatment communicated as the underlying goals for combined and separate sewer areas, respectively. For sites that trigger the Chapter 19.1 component of the Unified Stormwater Rule, the hierarchy is mandatory, meaning that developers must start with the most preferred SMP and provide documentation of site constraints that prevent implementation in order to move to the next SMP.

The Unified Stormwater Rule is expected to result in substantial improvements to the way that new and redeveloped individual properties manage stormwater compared with the 2012 Stormwater Rule it replaced. In some cases, stormwater will be entirely prevented from entering the sewer system through retention and, in most cases, stormwater that does enter the system will be reduced and/or treated and released at a lesser rate, allowing the system to operate more efficiently during peak wet weather events. In combined sewersheds such as the portion of Brooklyn that contains the Project Area, the Unified Stormwater Rule is expected to lead to a reduction in CSO volume as lots redevelop over time. The analyses of stormwater flows presented in this assessment account for the recommendations of the Unified Stormwater Rule and design guidance included within.

D. THE FUTURE WITHOUT THE PROPOSED ACTIONS

In the future without the Proposed Actions (the "No Action" condition), the Project Area would be retenanted with complying commercial uses in the existing buildings. These uses are permitted under existing zoning and no discretionary actions would be required. As described in Attachment A, "Project Description," in the No Action condition, the approximately 296,000 sf of commercial space on Projected Development Site 1 and approximately 399,000 sf of commercial space on Projected Development Site 2 would be retenanted with complying commercial uses in the existing buildings. These uses are permitted under existing zoning and no discretionary actions would be required. The approximately 46,000 sf of parking space (125 parking spaces) on Projected Development Site 1 would remain. Absent the opportunity for residential use that would be allowed by the Proposed Actions, the Applicant would lease space in the buildings for conforming commercial uses, consistent with market conditions.

SANITARY FLOWS

For the purposes of analysis, the amount of sanitary sewage in the No Action condition is estimated as all water demand generated within the Project Area except water used by air conditioning, which is typically not discharged to the sewer system. **Table J-2** summarizes the water demand and sewage generation within the Project Area in the No Action condition. It is estimated that the No Action condition will generate 69,500 gpd of sanitary sewage.

Table J-2
No Action Condition Water Consumption and Wastewater Generation

Land Use	Water Consumption and Wastewater Generation Rates[1]	Area/ Units[2]	Domestic Water/Wastewater Generation (gpd)	Air Conditioning (gpd)
Commercial[3]	Domestic: 0.10 gpd/sf A/C: 0.17 gpd/sf	695,000 sf	69,500	118,150
Project Area—Total Water Demand				**187,650**
Project Area—Total Wastewater Generation				**69,500**

Notes:
gpd – gallons per day; sf – square foot
Totals may not sum due to rounding.
[1] Consumption rates from *CEQR Technical Manual* Table 13-2, "Water Usage and Sewage Generation Rates for Use in Impact Assessment," unless otherwise noted.
[2] The parking area will not generate wastewater and is not included in the table.
[3] The estimates conservatively assume office rates for commercial space.

STORMWATER FLOWS

As noted above, in the No Action condition, the Project Area would be retenanted with complying commercial uses in the existing buildings. Therefore, there would be no change in surface coverage as compared to the existing condition, and the surface coverage and stormwater runoff coefficient would remain as shown in **Table J-1** above.

E. THE FUTURE WITH THE PROPOSED ACTIONS

Under the RWCDS in the With Action condition, the existing, underutilized commercial buildings within the Project Area would be partially converted and enlarged. The RWCDS includes approximately 1,005,480 gsf of total development, consisting of 758,300 gsf of new residential space and 716 total dwelling units, of which approximately 179 would be permanently affordable units, as well as approximately 186,170 gsf of commercial and/or community facility space and 61,010 sf of parking, containing 188 parking spaces.

SANITARY FLOWS

As shown in **Table J-3**, in the With Action condition, wastewater generated within the Project Area would total 189,281 gpd, which represents an incremental increase of 119,781 gpd compared to the No Action condition. The incremental increase in sewage generation is the result of the residential conversion and enlargement of the existing buildings within the Project Area.

The incremental increase in sewage generation would be approximately 0.4 percent of the average daily flow at the Red Hook WRRF and would not result in an exceedance of the WRRF's permitted capacity of 60 mgd. In addition, in accordance with the New York City Plumbing Code

(Local Law 33 of 2007), all development in the Project Area would be required to utilize low-flow plumbing fixtures, which would help to further reduce sanitary flows to the WRRF.

Table J-3
With Action Condition Water Consumption and Wastewater Generation

Land Use	Water Consumption and Wastewater Generation Rates[1]	Area/ Units[3]	Domestic Water/Wastewater Generation (gpd)	Air Conditioning (gpd)
Residential	Domestic: 100 gpd/person[2] A/C: 0.17 gpd/sf	758,300 sf 716 DUs	144,600	128,911
Commercial[4]	Domestic: 0.24 gpd/sf A/C: 0.17 gpd/sf	186,170 sf	44,681	31,649
Project Area—Total Water Demand				**349,841**
Project Area—Total Wastewater Generation				**189,281**
Incremental Water Demand (No Action to With Action)				**162,191**
Incremental Wastewater Generation (No Action to With Action)				**119,781**

Notes:
gpd – gallons per day; DU – dwelling unit; sf – square feet
Totals may not sum due to rounding.
[1] Consumption rates from *CEQR Technical Manual* Table 13-2, "Water Usage and Sewage Generation Rates for Use in Impact Assessment," unless otherwise noted.
[2] Based on Brooklyn Community District 2 average household size (2020 Census) of 2.02 per DCP's Population FactFinder
[3] The parking area will not generate wastewater and is not included in the table.
[4] The estimates conservatively assume retail rates for the commercial space.

Connecting to the City's sewer system requires certification from DEP as part of the building permit process, which is not a discretionary approval. An applicant would be required to file an SCP Application for approval from DEP to tie into the sewer system. The converted and enlarged buildings in the Project Area would require an SCP Application. The Applicant would be required to demonstrate that the existing sanitary system could handle the site-specific sanitary flows from the Proposed Development, or, if the flows would exceed the capacity of the existing built sewer system, the Applicant would be required to prepare a site-specific hydraulic analysis to identify any required sewer upgrades, including upgrades to the existing regulators. In addition, there may be a need to amend the existing drainage plan based on the hydraulic analysis calculations.

As the RWCDS is not expected to result in a significant increase in dry weather flows to the combined sewer system and the Red Hook WRRF, there would be no significant adverse impacts to sanitary sewage conveyance and treatment infrastructure.

STORMWATER FLOWS

The With Action condition would not result in changes to surface coverage within the Project Area, as the existing buildings would be converted to residential uses and vertically enlarged, and there would be no increase in the building footprints. Therefore, in the With Action condition, the surface coverage and stormwater runoff coefficient would remain as shown in **Table J-1** above, and the Proposed Actions would not result in an increase in the weighted runoff coefficient as compared to the No Action condition.

Using these sanitary and stormwater flow calculations, the DEP Volume Calculation Matrix was utilized to determine flows for the With Action condition. The calculations from the Volume Calculation Matrix help to determine the change in wastewater volumes to the combined sewer system from existing conditions to the With Action condition and include four rainfall runoff volume scenarios with varying durations. The drainage analysis assumes that all stormwater runoff from the Project Area would flow via the existing combined sewer infrastructure serving the Project Area. The summary tables of the Volume Calculation Matrix are included in **Table J-4**.

Table J-4
DEP Volume Calculation Matrix:
Existing and With Action Condition Volume Comparison

Rainfall Volume (in)	Rainfall Duration (hr)	Runoff Volume to SS (MG)	Runoff Volume to CSS (MG)*	Sanitary Volume to CSS (MG)	Total Volume to CSS (MG)	Runoff Volume to SS (MG)	Runoff Volume to CSS (MG)*	Sanitary Volume to CSS (MG)	Total Volume to CSS (MG)	Increased Total Volume to CSS (MG)*
RH-012		Existing Condition				With Action Condition				RH-012 Increment
		101,720 sf (2.34 acres)				101,720 sf (2.34 acres)				
0.00	3.80	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.03	0.03
0.40	3.80	0.00	0.02	0.00	0.02	0.00	0.02	0.03	0.05	0.03
1.20	11.30	0.00	0.07	0.00	0.07	0.00	0.07	0.09	0.16	0.09
2.50	19.50	0.00	0.14	0.00	0.14	0.00	0.14	0.15	0.29	0.15

Notes:
Totals may not sum due to rounding.
* Assumes no on-site detention or Best Management Practices (BMPs) for purposes of calculations.
SS = Storm Sewer; CSS = Combined Sewer System; MG = Million Gallons

As shown in **Table J-4**, in all rainfall scenarios there would be an increase in volume for CSO at outfall RH-012 under the With Action condition as compared to the existing condition volumes, as there would be an increase in sanitary sewage generation; however, as there would be no change in surface coverage, stormwater runoff would remain the same between the existing and With Action conditions.

The volume matrix calculations presented above do not reflect the use of any sanitary and stormwater source control BMPs to reduce sanitary volume and stormwater runoff volumes to the combined sewer system. As noted above, the Proposed Development would incorporate low-flow plumbing fixtures to reduce sanitary flow as required by the New York City Plumbing Code. In addition, stormwater detention would be required as part of the DEP SCP Application process for buildings connecting to the City's sewer system. As part of the SCP permit approval process, developments must be in compliance with the required on-site stormwater volume requirements and stormwater release rate as detailed in the Unified Stormwater Rule. The performance standard is intended to reduce peak discharges to the City's sewer system during rain events by requiring greater on-site storage of stormwater runoff and slower release to the sewer system. The implementation of DEP's stormwater performance standard over time is expected to provide additional capacity to the existing sewer system, thereby improving its performance. The performance standard is a key element of the New York City Green Infrastructure Plan to promote green infrastructure and improve water quality in the City's surrounding waterbodies. Specific BMP measures for the Proposed Actions would be confirmed in the future in consultation with DEP when specific designs are advanced.

As noted above, because the City's sewers are sized and designed based on the designated zoning of an area and related population density and surface coverage characteristics, the Proposed Actions may result in development that is inconsistent with the design of the existing built sewer system. If necessary, subject to additional consultation with DEP, an Amended Drainage Plan (ADP) would be prepared. In addition, a hydraulic analysis of the existing sewer system may be required as part of the SCP permit approval process. The hydraulic analysis calculations would inform the ADP process as necessary. Sewer improvements and/or incorporation of BMPs may also be required of the Applicants at the time of the site connection proposal.

The Proposed Actions would result in the same peak stormwater runoff rates compared to existing conditions. Although the Proposed Actions would result in increased volume to the combined sewer system due to an increase in sanitary flows, because of the available capacity of the Red Hook WRRF, the projected increased volume to the combined sewer system would not have a significant adverse impact on water quality. In addition, with the incorporation of BMP measures to comply with the Unified Stormwater Rule, the Proposed Actions are not expected to appreciably increase the frequency or volume of CSO events. (See also EAS Appendix 1, "Agency Correspondence.") Therefore, the Proposed Actions would not result in significant adverse impacts to the local water supply or wastewater and stormwater conveyance and treatment infrastructure. ✷

EAS Appendix 1
Agency Correspondence

NYC Landmarks Preservation Commission

253 Broadway
11th Floor
New York, NY 10007

Voice (212) 669-7700
http://nyc.gov/landmarks

ENVIRONMENTAL REVIEW

Project number: DEPARTMENT OF CITY PLANNING / 78DCP163K
Project: COLUMBIA HEIGHTS REZONING
Date Received: 9/30/2025

Properties with no Architectural or Archaeological significance:

1) 29 COLUMBIA HEIGHTS, BBL: 3002040001
2) 67 FURMAN STREET, BBL: 3002080001
3) 51 FURMAN STREET, BBL: 3002080002
4) COLUMBIA HEIGHTS, BBL: 3002080012

Comments:

LPC DESIGNATED AND S/NR LISTED BROOKLYN BRIDGE; BROOKLYN HEIGHTS HISTORIC DISTRICT; FULTON FERRY HISTORIC DISTRICT; LPC DESIGNATED BROOKLYN CITY RAILROAD COMPANY BUILDING, 8-10 CADMAN PLAZA WEST; AND S/NR ELIGIBLE BROOKLYN QUEENS EXPRESSWAY AND (FORMER) NATIONAL COLD STORAGE COMPANY COMPLEX (INCLUDES JOHN T. MARTIN STORES), 44-88 FURMAN STREET WITIHIN RADIUS.

NO SUN-SENSATIVE PROPERTIES WITHIN SHADOW RADIUS.

Gina Santucci 10/9/2025

SIGNATURE DATE
Gina Santucci, Environmental Review Coordinator

File Name: 37754_FSO_KLW_10092025.docx

Environmental Protection

Rohit T. Aggarwala
Commissioner

Angela Licata
Deputy Commissioner
Sustainability

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alicata@dep.nyc.gov

October 28, 2025

Stacey Barron
Associate Project Manager
Environmental Assessment and Review Division
New York City Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

Re: Columbia Heights Rezoning
25 and 30 Columbia Heights
Block 204, Lot 1 and Block 208, Lots 1, 2, and 12
CEQR # 78DCP163K

Dear Ms. Barron:

The New York City Department of Environmental Protection, Bureau of Sustainability (DEP) has reviewed the September 2025 Environmental Assessment Statement (EAS) hazardous materials section and the September 2025 Phase I Environmental Site Assessment (Phase I), prepared by AKRF, Inc., on behalf of 25-30 Columbia Heights (Brooklyn), LLC (applicant), for the above referenced project. It is our understanding that the applicant is seeking a zoning map amendment and zoning text amendment from the New York City Department of City Planning (DCP) to facilitate a mixed-use development consisting of a partial residential conversion and enlargement of two existing, underutilized commercial buildings (Proposed Development) located on two adjacent blocks (Development Site or Project Area) in Brooklyn Community District 2. The Project Area consists of (i) a parcel located at 25 Columbia Heights (Block 204, Lot 1), comprising the block bounded by Columbia Heights, Vine Street, McKenny street, and Doughty Street (25 Columbia Heights), and (ii) parcels located at 30-58 Columbia Heights (Block 208, Lots 1, 2, and 12), comprising the block bounded by Columbia Heights, Doughty Street, Furman Street, and Squibb Park (collectively, 30 Columbia Heights). Under the Reasonable Worst Case Development Scenario (RWCDS), the Proposed Development on 25 Columbia Heights consists of the existing 295,980 gsf, 12-story commercial building being enlarged by approximately 162,590 gsf (6 stories) to a 17-story, approximately 460,570 gsf building. The building would be renovated to include approximately 399,710 gsf residential use (392 dwelling units), approximately 14,850 sf of commercial use and 46,010 gsf of parking (165 spaces), accessory to the residential use. Approximately 25 percent of the residential floor area in the building would comprise affordable units, in accordance with Option 1 of the Mandatory Inclusionary Housing (MIH) Program, which would apply to the Development Site pursuant to the applicant's proposed text amendment to Appendix F. The RWCDS for 30 Columbia Heights consists of the existing 13-story commercial building being renovated and enlarged by approximately 145,890 gsf and from

13 stories (141 feet) to 19 stories. The zoning lot would include approximately 544,910 gsf, with approximately 358,590 gsf of residential use (324 dwelling units), approximately 171,320 sf of commercial use, and 15,000 gsf of parking (23 spaces) accessory to the residential use. The three smaller buildings would not have any change in bulk or use (commercial buildings of 4-5 stories and 39-53 feet). Approximately 25 percent of the residential floor area in the building would comprise affordable units, in accordance with Option 1 of the MIH Program, which would apply to the Development Site pursuant to the applicant's proposed text amendment to Appendix F.

The September 2025 Phase I report revealed that historical on-site and surrounding area land uses consisted of a variety of residential, commercial, and industrial uses including a pharmaceutical factory, a flour mill, a watch case factory, coal storage, a foundry, a machine shop, carpenters, iron works, a tinware factory, coffee polishing, a cigar factory, a shoe factory, a plumbing supplies factory, a lead pipe factory, a brass foundry, a cracker bakery, an electrical appliance factory, a bakery, a cigar box factory, a milling company, drug grinding, a coal yard, printing, a coffee company, a candy factory, sheet metal works, a cold storage company, a filling station, auto repair, a water pollution control facility, etc. Regulatory databases identified 7 underground storage tank sites and 14 aboveground storage tank sites within 1/8 mile; 31 leaking storage tank sites, 7 voluntary cleanup program sites, 2 brownfields sites, and 276 spills within 1/2 mile; and 6 manufactured gas plant sites and 5 historical auto sites within 1 mile of the subject property.

Based upon our review of the submitted documentation, we have the following comments and recommendations to DCP:

- DCP should inform the applicant that based on the historical on-site and/or surrounding area land uses, a Phase II Environmental Site Assessment (Phase II) is necessary to adequately identify/characterize the surface and subsurface soils, groundwater, soil vapor/sub-slab soil vapor, indoor air, and outdoor air of the subject property, and to inform and disclose the measures necessary to avoid impacts from hazardous materials. A Phase II Investigation Work Plan summarizing the proposed drilling, soil, groundwater, soil vapor/sub-slab soil vapor, indoor air, and outdoor air sampling activities should be developed in accordance with the City Environmental Quality Review Technical Manual and submitted for DEP review and approval. The Phase II Investigation Work Plan should include blueprints and/or site plans displaying the current surface grade and sub-grade elevations and a site map depicting the proposed soil, groundwater, soil vapor/sub-slab soil vapor, indoor air, and outdoor air sampling locations. Soil and groundwater samples should be collected and analyzed by a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified laboratory for the presence of volatile organic compounds (VOCs) by United States Environmental Protection Agency (EPA) Method 8260, semi-volatile organic compounds by EPA Method 8270, pesticides by EPA Method 8081, polychlorinated biphenyls by EPA Method 8082, and Target Analyte List metals (filtered and unfiltered for groundwater samples). The soil vapor/sub-slab soil vapor, indoor air, and outdoor air sampling should be conducted in accordance with the NYSDOH October 2006 Guidance for Evaluating Soil Vapor Intrusion in the State of New York. The soil vapor/sub-slab soil vapor, indoor air, and outdoor air samples should be collected and analyzed by a NYSDOH ELAP

certified laboratory for the presence of VOCs by EPA Method TO-15. An Investigation Health and Safety Plan (HASP) should also be submitted to DEP for review and approval. The Phase II Work Plan should also describe and include site development plans indicating maximum soil excavation depths/elevations for building slabs, footings, subsurface utilities, elevator pits, etc., as well as any proposed grade-level yard, courtyard, parking, or grass/landscaped areas. Description of the proposed uses in sub-grade, first floor, and outdoor areas of the proposed development should also be included.

- DCP should also instruct the applicant that the Phase II Work Plan and HASP should be submitted for DEP review and approval prior to the start of any fieldwork.

- DCP should inform the applicant that the EAS should be revised/updated as appropriate as the hazardous materials assessment progresses.

Future correspondence and submittals related to this project should include the following CEQR # **78DCP163K**. If DCP has any questions, you may contact me at weiy@dep.nyc.gov.

Sincerely,

Wei Yu
Deputy Director, Hazardous Materials

c: R. Weissbard
T. Estesen
M. Wimbish
S. Shellooe – DCP
E. Ulker-Kacar – DCP

Environmental Protection

Rohit T. Aggarwala
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MEMORANDUM

To: Stacey Barron
DCP EARD

From: Mitchell Wimbish MW
DEP BEPA

Subject: Columbia Heights Rezoning
CEQR # 78DCP163K

Date: October 29, 2025

New York City Department of Environmental Protection (DEP) has reviewed the *Water and Sewer Infrastructure* chapter Environmental Assessment Statement and Draft Scope of Work for the above referenced project and has the following comments:

Water System

- Existing water mains should be capable to handle the estimated increase in water demand for the above subject project.

Sanitary Sewer

- The proposed actions would likely result in an increase of sanitary flow to the adjacent sewers. A hydraulic analysis of the existing sewer system will likely be required prior to the submittal of the Site Connection Proposal Application (SCP) to determine whether the existing sewer system is capable of supporting higher density development and related increase in wastewater flow, or whether there will be a need to upgrade the existing sewer system. In addition, there may be a need to amend the exiting drainage plan based on the hydraulic analysis.

Storm Sewer

- The site development would need to meet requirements of Chapter 31 of the Rules of the City of New York for site connections.

C: Steve Carrea, P.E. – BWSO
Andy Lu, P.E. – BWSO
Lillian Cheng, P.E. – BWSO
Epiphanie Sawadogo – BWSO
Terrell Estesen – BEPA
Stephanie Shellooe – NYCDCP
Evren Ulker-Kacar – NYCDCP