Brooklyn Marine Terminal
Maritime and Mixed-Use Redevelopment Project
Draft Scope of Work for an Environmental Impact Statement
(CEQR No. 25DME018K)

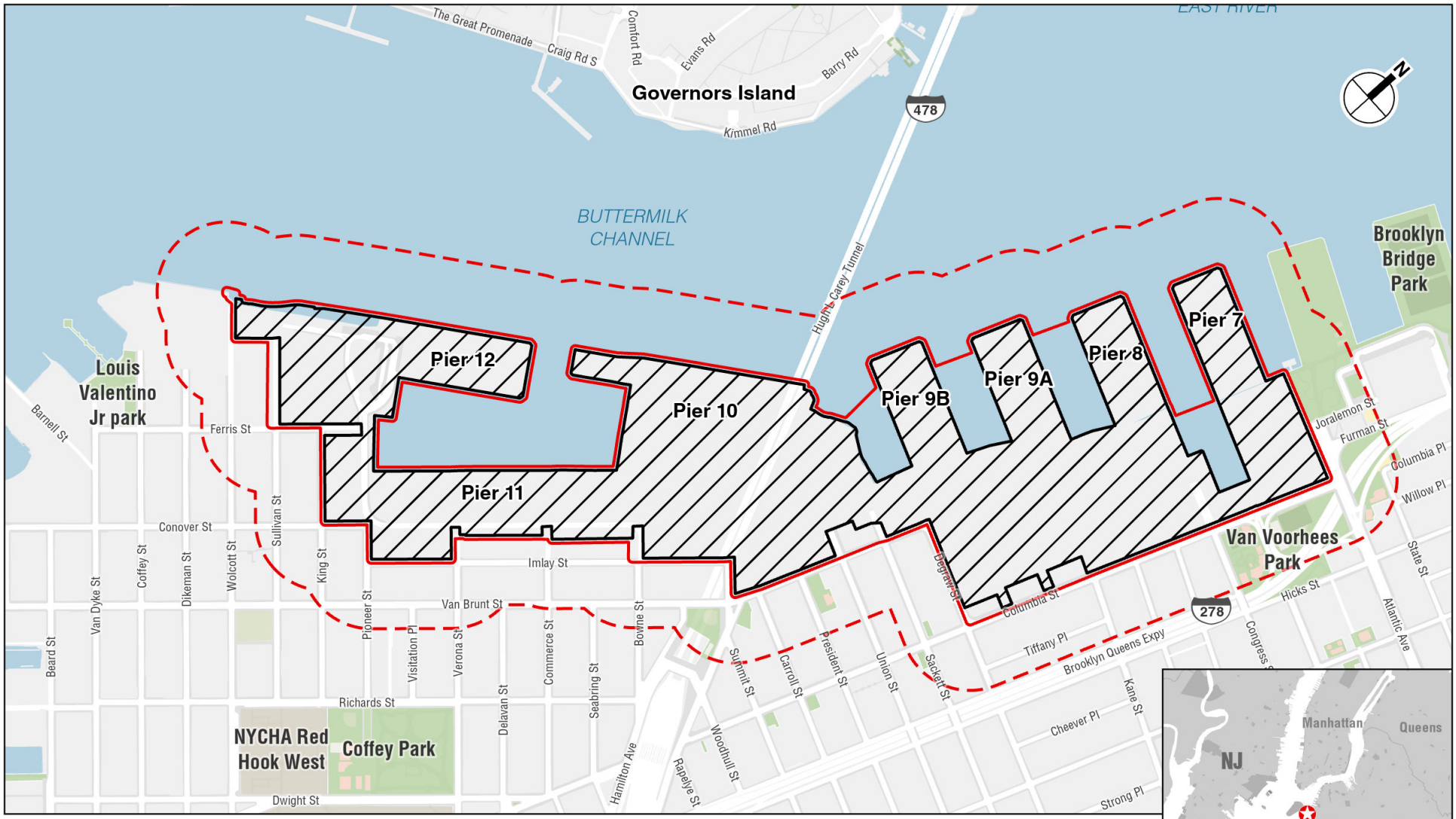
A. INTRODUCTION

This Draft Scope of Work (DSOW) describes the technical areas to be analyzed in the preparation of an Environmental Impact Statement (EIS) for the proposed Brooklyn Marine Terminal (BMT) Maritime and Mixed-Use Redevelopment Project (the "Proposed Project" or "BMT Redevelopment Project") located in Community District 6 in South Brooklyn, New York. The New York City Economic Development Corporation (NYCEDC) is leading a partnership among NYCEDC, the City of New York (City), the Port Authority of New York and New Jersey (Port Authority) (PANYNJ), and the New York State Urban Development Corporation d/b/a Empire State Development (ESD) to facilitate the following land transfers: (1) the transfer of land from the Port Authority and City, to ESD, and ultimately the ground lease of such land to the Brooklyn Marine Terminal Development Corporation, at the Brooklyn Marine Terminal (BMT) in the Columbia Street Waterfront and Red Hook neighborhoods, Brooklyn; and 2) the transfer of land from the City to ESD, and ESD's reconveyance of such land to the Port Authority at Howland Hook Marine Terminal (HHMT), in Howland Hook, Staten Island. NYCEDC, in partnership with ESD, is concurrently leading a planning process to transform the approximately 122-acre BMT site and approximately 2 acres of select adjacent parcels (collectively, the 124-acre "Project Area" shown in **Figure 1,** or the "Site") into a modern, financially viable port and vibrant mixed-use district.

Ownership of both BMT and HHMT is currently divided between the Port Authority and the City. The Proposed Project envisions that, in order to consolidate ownership of the BMT, the Port Authority would transfer its ownership of property within the BMT to facilitate the Proposed Project and in exchange, the City would transfer to the Port Authority its ownership of the HHMT, which the Port Authority currently leases from the City. The proposed property exchange would enable the BMT Redevelopment Project and ensure that the BMT and HHMT are owned and more efficiently managed by the public entities primarily responsible for their ongoing operations and redevelopment.[1]

[1] The Proposed Project will enable the Port Authority to continue to operate and maintain HHMT and continue to implement existing, ongoing projects that are aimed at maintaining a state of good repair at HHMT. The Proposed Project does not depend on these ongoing projects at HHMT, nor do these HHMT projects depend on approval of the BMT Proposed Approvals. Currently, the Port Authority has no specific plans for expansion projects at HHMT, and the Proposed Project does not include any plans for expansion projects at HHMT. Any future expansion project at HHMT will undergo applicable environmental review.

9.16.25



Project Location

EDC BROOKLYN MARINE TERMINAL

Figure 1

The Proposed Project requires a suite of discretionary City, State, and Federal actions and approvals (collectively the "Proposed Approvals") that warrant assessment for potential environmental impacts. The Proposed Approvals include ESD's Directors' adoption and affirmation of a General Project Plan (GPP) under the New York State Urban Development Corporation Act ("UDC Act") that would, among other things, authorize ESD to override certain provisions of the New York City Zoning Resolution and other local laws, as applicable, and would facilitate the proposed land transfers as well as the comprehensive reuse and redevelopment of the Project Area. The Project Area's redevelopment would also be facilitated by City and State funding and other City and State discretionary actions; together with the GPP, these actions are subject to review under the State Environmental Quality Review Act (SEQRA), in conformance with City Environmental Quality Review (CEQR) guidelines and procedures. The Office of the Deputy Mayor for Housing, Economic Development and Workforce (DMHEDW) is acting as the lead agency for the environmental review. In addition, it is anticipated that the Proposed Project would receive funding from the U.S. Department of Transportation's (USDOT) Maritime Administration (MARAD) for port improvements; the provision of these federal funds will require assessment pursuant to the National Environmental Policy Act (NEPA). The Proposed Approvals are described in full in Section D, "Required Approvals."

Through an extensive planning and community engagement process, NYCEDC, its partner agencies, and a group of key stakeholders (the "BMT Task Force") developed the *Vision for Brooklyn Marine Terminal (BMT Vision Plan)*, which includes modern maritime infrastructure; the delivery of jobs, new housing, and light industrial and commercial space; infrastructure improvements; new public open space; and waterfront access and resiliency measures that protect against climate change and sea-level rise for the Project Area that would be implemented through the GPP. This DSOW for the Draft Environmental Impact Statement (DEIS) provides a framework for analyzing the potential environmental impacts of the Proposed Approvals. As detailed below, the technical analyses in the DEIS will consider a reasonable worst-case development scenario (RWCDS) for review under SEQRA and CEQR.

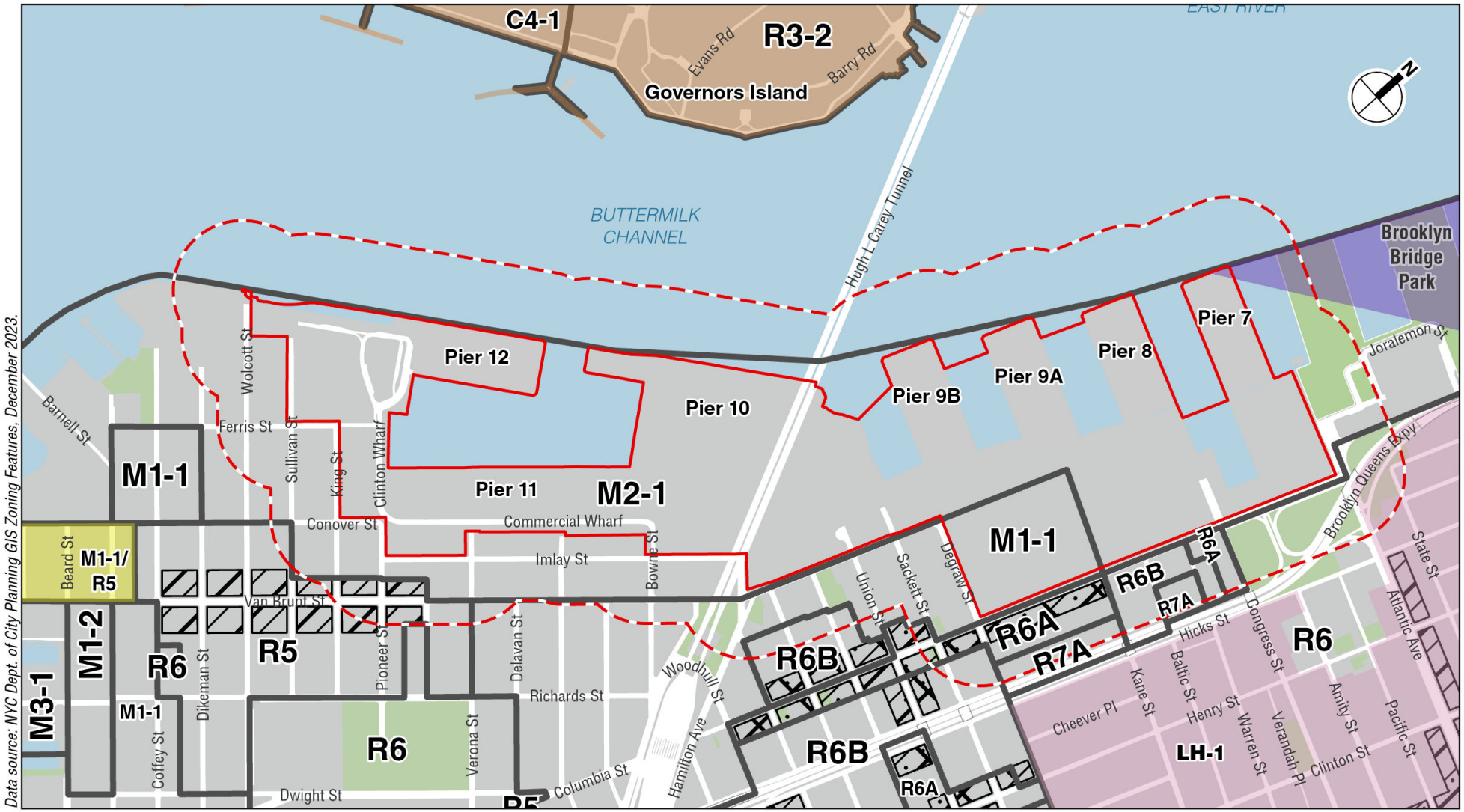
The RWCDS assumes the Project Area would be redeveloped to include a 60-acre modern and sustainable all-electric port; approximately 6,000 dwelling units (DU), of which approximately 2,400, or 40 percent, would be permanently affordable; approximately 275,000 square feet (sf) of light-industrial space; approximately 250,000 sf of community facility uses; approximately 275,000 sf of commercial uses; approximately 155,000 sf of hotel space; and approximately 28 acres of new destination and neighborhood open space, which reflect the 9/22/25 approved *BMT Vision Plan*. These square footage programmatic assumptions are the basis for the RWCDS gross square footage detailed in **Table 1**. Completion of the Proposed Project is anticipated by 2038. See Section F, "Analysis Framework," for more details on the RWCDS and analysis framework.

B. PROJECT BACKGROUND

PROJECT AREA EXISTING CONDITIONS

The Project Area is an approximately 124-acre area that includes the existing, approximately 122-acre BMT, and approximately 2 acres of select adjacent publicly and privately owned parcels. As shown in **Figures 1-6**, the Project Area is bounded by Atlantic Avenue and Brooklyn Bridge Park to the north; Columbia, Van Brunt, Imlay, Conover and Ferris streets to the east; Wolcott, Sullivan, King, Pioneer, Summit, and Degraw streets to the south; and Atlantic Basin and Buttermilk Channel to the west. It spans multiple neighborhoods within Brooklyn Community District 6, including the Columbia Street Waterfront and Red Hook.

9.19.25



Data source: NYC Dept. of City Planning GIS Zoning Features, December 2023.

Project Area
Study Area (400-foot perimeter)
Zoning District Boundary
Parks
C1-3
C2-3
C2-4
Special Governors Island District
Special Mixed Use District (MX-5)
Special Scenic View District (SV-1)
Limited Height Special District (LH-1)

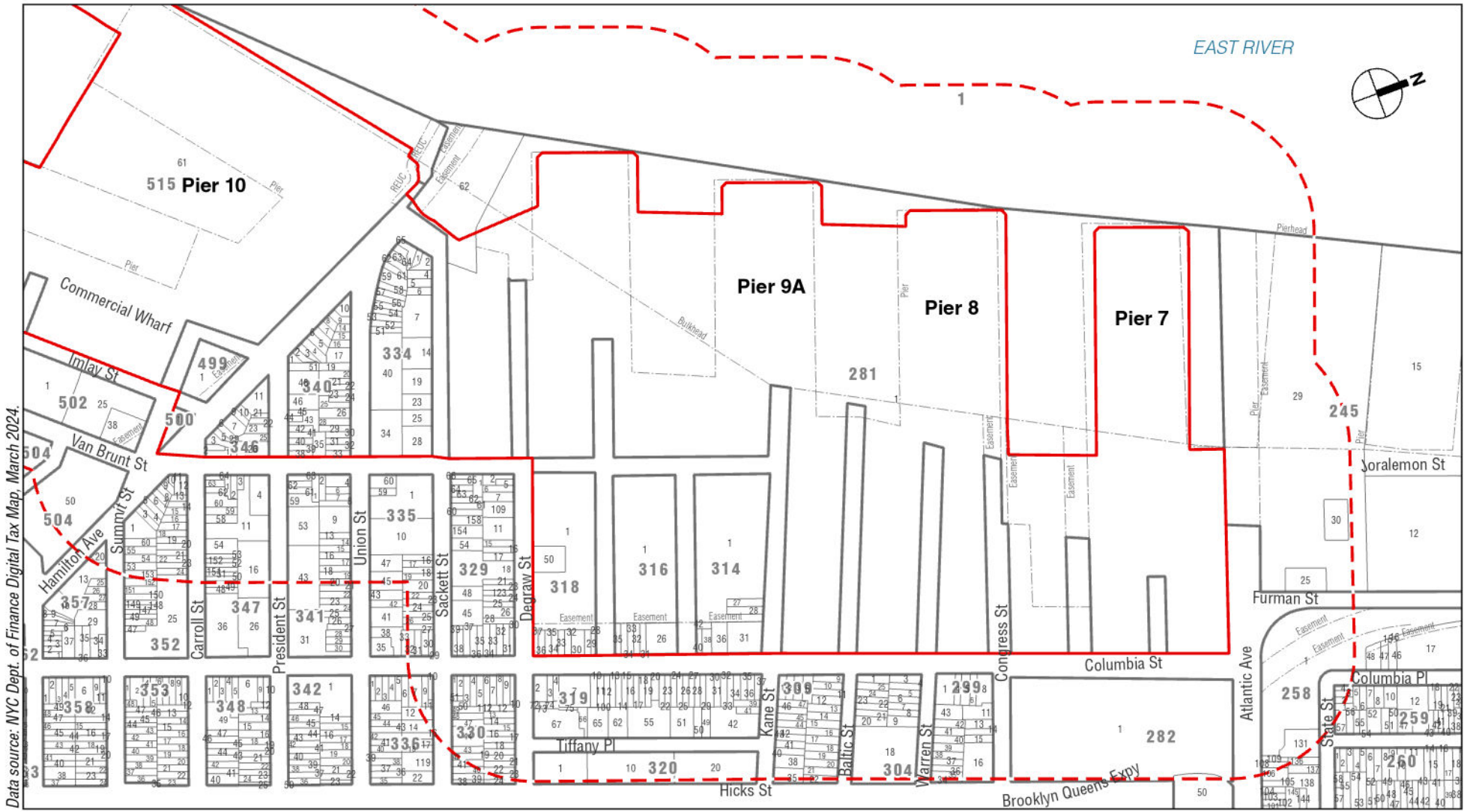
0 0.25 MILE

Existing Zoning

EDC BROOKLYN MARINE TERMINAL

Figure 2

7.14.25



Data source: NYC Dept. of Finance Digital Tax Map, March 2024.

Project Area

Study Area (400-foot perimeter)

Tax Lot Boundary

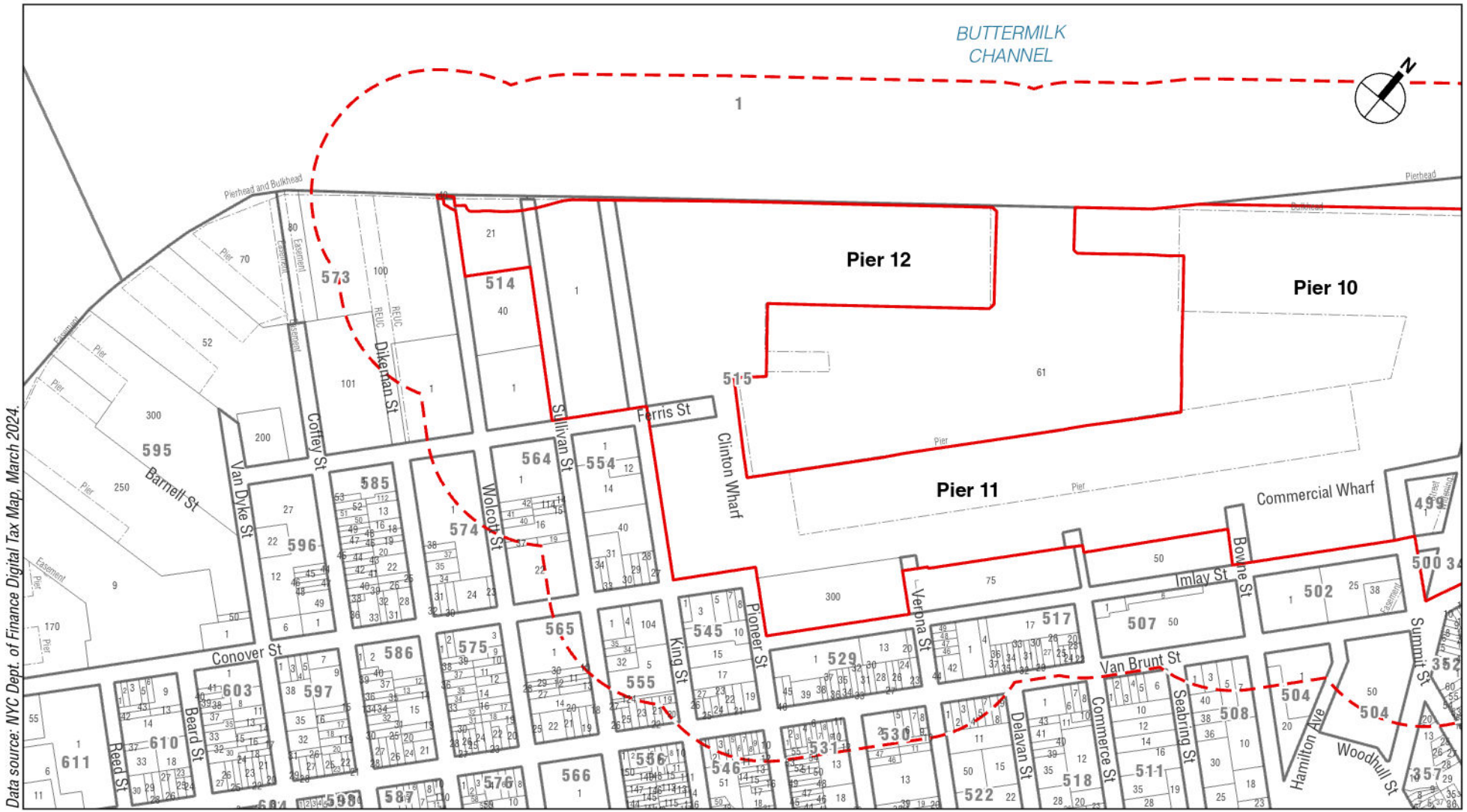
Tax Block Boundary

Tax Map

EDC BROOKLYN MARINE TERMINAL

Figure 3a

7.14.25



Data source: NYC Dept. of Finance Digital Tax Map, March 2024.

0 0.25 MILE

Project Area

Study Area (400-foot perimeter)

Tax Lot Boundary

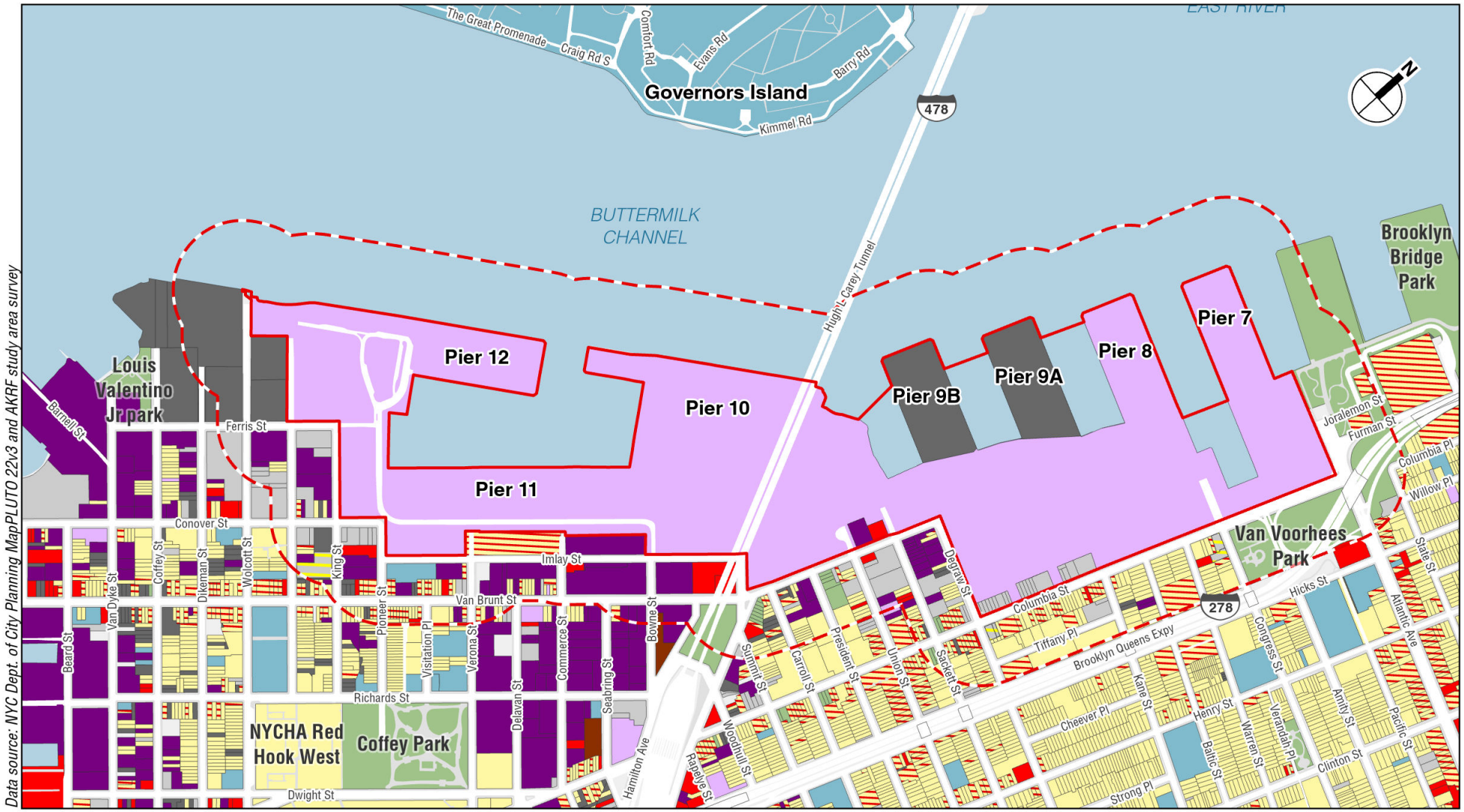
Tax Block Boundary

Tax Map

EDC BROOKLYN MARINE TERMINAL

Figure 3b

9.18.25



Data source: NYC Dept. of City Planning MapPLUTO 22v3 and AKRF study area survey

- Project Area
- Study Area (400-foot perimeter)
- Commercial and Office Buildings
- Hotels
- Industrial and Manufacturing
- Open Space and Outdoor Recreation
- Parking Facilities
- Public Facilities and Institutions
- Residential
- Residential with Commercial Below
- Transportation and Utility
- Under Construction
- Vacant

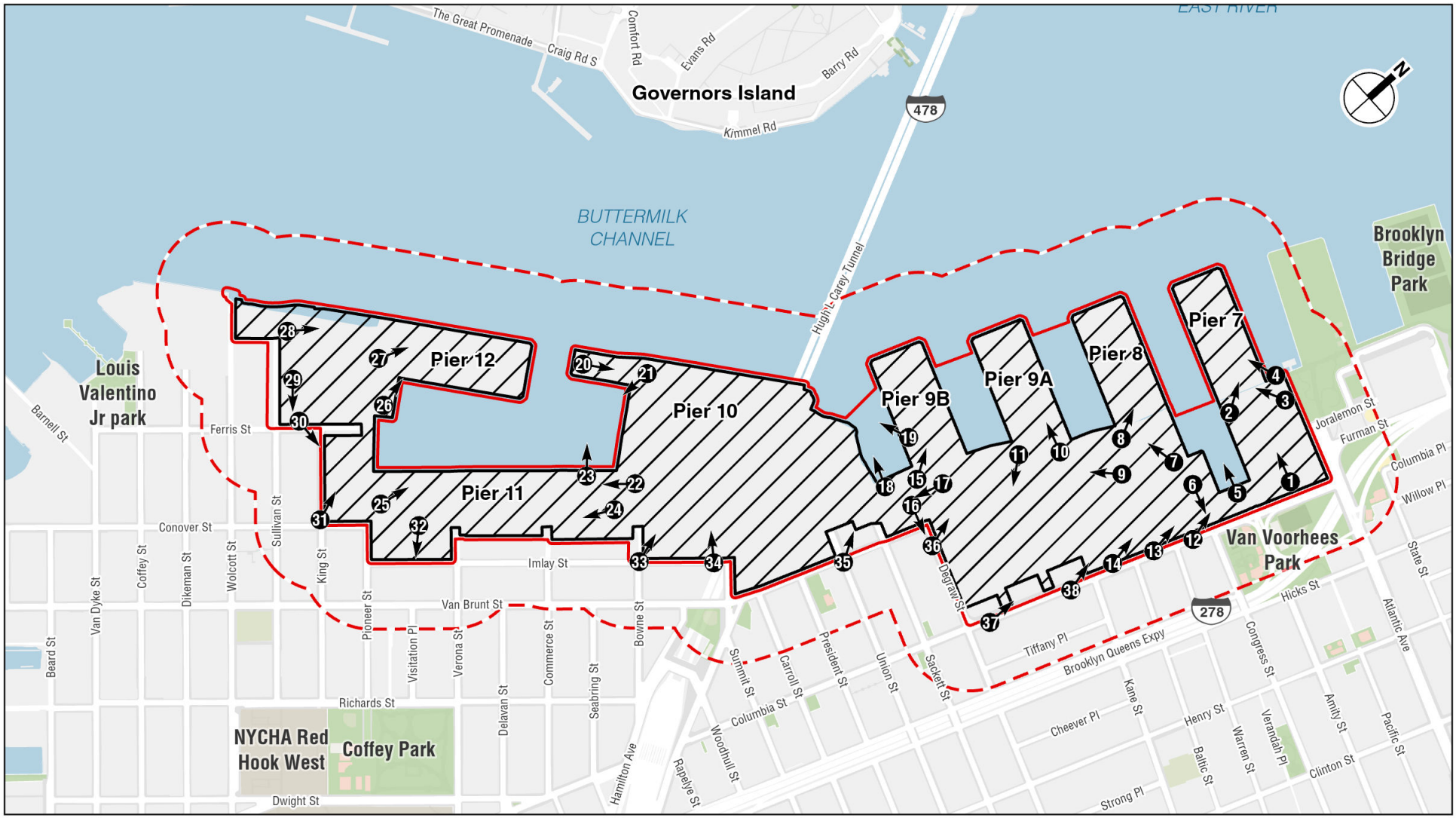
0 0.25 MILE

Existing Land Use

EDC BROOKLYN MARINE TERMINAL

Figure 4

9.24.25



Project Area

Study Area (400-foot perimeter)

Brooklyn Marine Terminal

Photograph View Direction and Reference Number

0 0.25 MILE

Photograph Locations

EDC BROOKLYN MARINE TERMINAL

Figure 5

1

2

Project Area Photographs

Figure 6a

7.3.25

3

4

Project Area Photographs

Figure 6b

7.3.25

5

6

Project Area Photographs

Figure 6c

EDC BROOKLYN MARINE TERMINAL

7.3.25

7

8

Project Area Photographs

Figure 6d

EDC BROOKLYN MARINE TERMINAL

9

10

Project Area Photographs

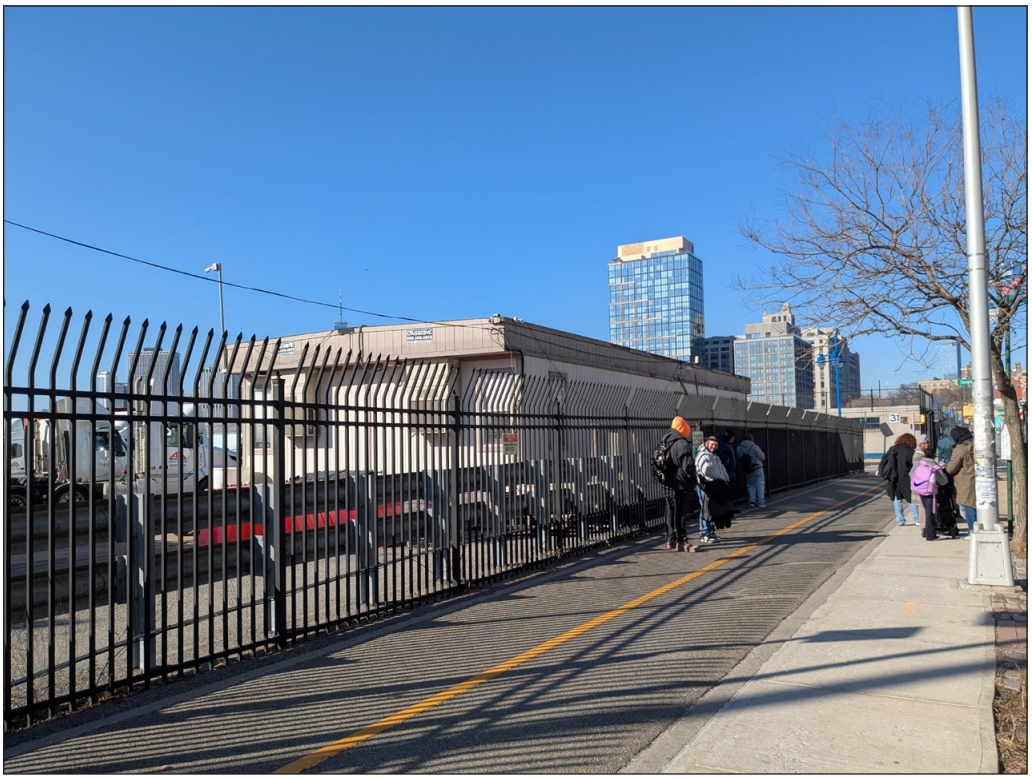
Figure 6e

11

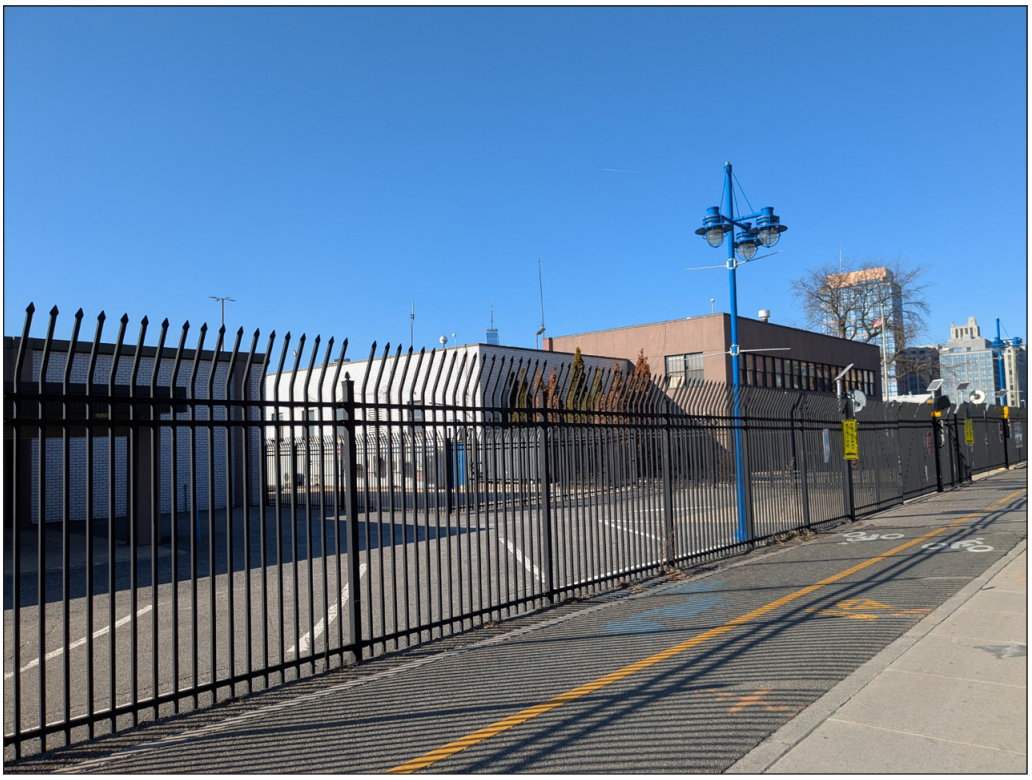
12

Project Area Photographs

Figure 6f



13



14

Project Area Photographs

Figure 6g

15

16

Project Area Photographs

Figure 6h

7.3.25

17

18

Project Area Photographs

Figure 6i

19

20

Project Area Photographs

Figure 6j

21

22

Project Area Photographs

Figure 6k

23

24

Project Area Photographs

Figure 6I

25

26

Project Area Photographs

Figure 6m

27

28

Project Area Photographs

Figure 6n

29

30

Project Area Photographs

Figure 6o

31

32

Project Area Photographs

Figure 6p

33

34

Project Area Photographs

Figure 6q

35

36

Project Area Photographs

Figure 6r

37

38

Project Area Photographs

Figure 6s

BROOKLYN MARINE TERMINAL

The BMT is comprised of real property owned by the Port Authority and the City that includes the following primary components:

Red Hook Container Terminal (RHCT):

- Pier 7 - Consists of an approximately 270,000 gross square foot (gsf) warehouse and distribution facility and approximately 200,000 sf of upland area used for loading/unloading, parking, and circulation. The piers also accommodate Van Line Bunkering for tie-up space for refueling of marine vessels.
- Pier 8 - Consists of an approximately 230,000 gsf warehouse facility with office space currently used by U.S. Customs and Border Patrol (U.S. Customs) serving the RHCT. [2]
- Piers 9a and 9b - Approximately 200,000 sf and 175,000 sf, respectively, which have been condemned because of structural failure and are out of service.
- Upland Pier 8 and 9 - Approximately 230,000 sf and 900,000 sf, respectively, and are generally utilized for a variety of activities including industrial, light-industrial, open-air storage and parking. Approximately 6,500 sf of upland Pier 9 is temporarily used for NYC Department of Transportation's (NYCDOT) concrete recycling operation. In July 2025, NYCDOT announced the plan to relocate this temporary use off-site by the end of 2025.[3]
- Pier 10 - RHCT at Pier 10 occupies an approximately one million square foot area within the BMT. The current container terminal operates on less than half the Site (approximately 60 acres) with generally low-density operations. The RHCT is positioned in Upper New York Harbor with direct access to major shipping and trucking routes serving the greater metropolitan region. Its location and proximity to major economic nodes, residential populations and connections to national highway networks make it a port of potential regional and international maritime importance. Portions of BMT upland from Pier 10 are utilized for various industrial, light-industrial, open-air storage and parking uses that are non-maritime related. Specifically, the existing split of operations on BMT today is 50.8% Maritime Uses, 49.2% Non-Maritime Uses as surveyed by NYCEDC in 2025.
- Pier 11 - Located at the Atlantic Basin, a protected, rectangular inlet. There is currently a one-story, approximately 190,000 gsf warehouse building, including the under-construction Homeport II, which upon completion will be a roughly 42,000-gsf facility that services the NYC Ferry fleet, accommodating nightly storage, refueling, cleaning, and repairs. Pier 11 also consists of a roughly 70,000-sf surface parking lot, with approximately 130 spaces, used in conjunction with the BCT and Homeport II operations.

Brooklyn Cruise Terminal (BCT):

- Pier 12 - BCT opened in 2006 and is a roughly 180,000 sf facility serving thousands of passengers a year, leveraging the BMT's deep-water access and its strategic positioning in Upper New York Harbor. Adjacent to and south of BCT along the shoreline is a planned NYCDOT-led project to install a wharf structure with supporting riprap for NYCDOT to

[2] Recent dive inspections by NYCEDC show that structural conditions of Piers 7 and 8 are deteriorating and need approximately $400 million of investment to be brought back into a state of good repair in their current alignment (an alignment that is no longer suitable for modern cargo operations).

[3] NYCDOT is directly responsible for any approvals or environmental review associated with the temporary concrete recycling operation relocation.

operate as an emergency ferry landing site in the event of a citywide emergency. The NYCDOT emergency wharf improvements are partially funded by a United States Federal Transit Authority grant. NYCDOT is currently seeking environmental and construction permits with planned project completion by 2027.[4]

ADJACENT SITES WITHIN THE PROJECT AREA

The Project Area includes three other sites located adjacent to the BMT and are described as follows:

- **Site 1** (Block 334, Lots 28 and 34): This approximately 23,000-sf site adjacent to Pier 10 at Van Brunt Street between Union and Sackett Streets contains two privately owned commercial-light-industrial warehouse buildings totaling approximately 30,600 gsf.
- **Site 2** (Block 314, Lots 31, 36, 38, 40, and 40; Block 316, Lots 26, 31-35; and Block 318, Lots 28-30, 32-37): This site consists of City-owned parcels (under NYCDOT management) located at Columbia Street between Degraw and Kane Streets totaling approximately 47,000 sf. These parcels contain a mix of surface parking for NYCDOT-vehicles, field office space for its Traffic Operations and Bridges division, and open-air storage.
- **Site 3** (Block 573, Lot 40): This approximately 2,660-sf site is an underwater parcel at the end of Wolcott Street.

While the privately owned Site 1 is included in the planning exercise that informed the *BMT Vision Plan*, the BMT Redevelopment Project has been designed to function effectively with or without its ultimate inclusion. The acquisition of private property would be by negotiated purchase with the property owners and/or through the exercise of eminent domain, pursuant to the Eminent Domain Procedure Law (EDPL).

APRIL 2024 MEMORANDUM OF UNDERSTANDING

In April 2024, the City, NYCEDC, the Port Authority, and the State entered into a Memorandum of Understanding (MOU) that contemplates the proposed land transfers, after which the Port Authority will have complete ownership of 225-acre HHMT and the City will have complete control of BMT, which will ultimately be leased to the Brooklyn Marine Terminal Development Corporation, described below. In June 2024, NYCEDC assumed control of current BMT operations pursuant to a Net Lease, Net Sublease, Assignment and Release between the Port Authority, as Landlord, and NYCEDC, as Tenant. At the same time, the City extended and modified the HHMT lease pursuant to an Amended Lease between the City, as Landlord, and the Port Authority, as Tenant. The MOU provides a cooperation framework for regulatory approvals, funding opportunities, and public engagement, with formal binding agreements necessary to implement the BMT Redevelopment Project to follow.

BMTDC, BMTAF, BMTOTF

The City/NYCEDC will be able to transform the BMT into a modern maritime port and vibrant mixed-use community hub at the direction of a to-be-established Brooklyn Marine Terminal Development Corporation (BMTDC), a not-for-profit local development corporation, that will have as its purpose carrying out the *BMT Vision Plan* and executing ground leases and development agreements on the BMT property. BMTDC's mission statement reads: "BMTDC

[4] The NYCDOT BCT emergency wharf improvement is held constant in the BMT redevelopment project and will not be relocated, modified, or restricted in anyway by the Proposed Project.

was created to manage the transformation of the Brooklyn Marine Terminal site into a modern maritime port and vibrant mixed-use community by upholding the *BMT Vision Plan*. BMTDC is committed to ensuring transparency, accountability, and enforceable delivery of community commitments, revitalizing this section of the Brooklyn waterfront through investing in a modern port and developing new industrial spaces, creating thriving mixed-use spaces that enhance the adjacent communities, responding to the housing crisis by including both market-rate and affordable housing, improving mobility and transit accessibility, and developing new open spaces and opportunities for community gatherings, while increasing neighborhood resilience." In addition to long-term BMTDC control, an Oversight Task Force (BMTOTF) will be created after GPP affirmation, and will host quarterly meetings so the public can hear directly from agencies on the project's status and maintain an online repository of info to track project commitments. The purpose of the BMTOTF will be to advise on ensuring consistency and follow-through on project commitments and to provide a forum for continued community input.

Since the execution of the MOU and related agreements, the City committed an initial $80 million investment to stabilize and repair Piers 7, 8, and 10, and to fund planning for the 124-acre waterfront's future, along with up to an additional $15 million to fund a new modern, electrified container crane for operations at the terminal. Governor Hochul also announced a $15 million commitment for a future cold storage facility on-site.[5]

VISION PLANNING AND COMMUNITY ENGAGEMENT

Following the execution of the MOU, in May 2024, NYCEDC launched an extensive vision planning and community engagement process resulting in the *BMT Vision Plan.* The *BMT Vision Plan* was led by the BMT Task Force, with input from Advisory Groups, and additional public engagement through both workshops and focus groups.

In May 2024, NYCEDC began to meet biweekly with BMT Task Force Leadership: Congressman Goldman, Council Member Avilés, and State Senator Gounardes. BMT Task Force Leadership appointed the BMT Task Force, a 28-member group with representation from elected officials and local and citywide organizations to provide feedback on the planning and engagement process as well as the options presented by the NYCEDC project team and project consultants. The BMT Task Force brought together a balance of perspectives that reflected interests and expertise in maritime and industrial business, labor and trade, environmental justice, sustainability, transportation, housing, planning, community development, and regional and local perspectives.

NYCEDC and the BMT Task Force Leadership worked together to form six Advisory Groups, each one organized by key themes and issues. The Advisory Groups played a key role throughout the process by reviewing and providing feedback on planning work.

The engagement encompassed hundreds of hours of meetings and workshops where community stakeholders, residents, workers, business owners, elected officials, and industry experts provided input on a range of topics including maritime and industrial growth, housing and community development, climate resiliency and sustainability, transportation and mobility, and public open space. This approach ensured a broad cross-section of community members could articulate their perspectives on the challenges and needs that BMT and adjacent communities face today and will face in the future. In summary, and as of the time of the *BMT Vision Plan* approval, the engagement resulted in:

[5] The 2025 *BMT Vision Plan* includes additional "commitments" that built on the original 2024 MOU financial and programmatic commitments noted here.

- 4,265 people engaged;
- 915 survey responses;
- 27 public workshops;
- 23 Advisory Group meetings;
- 16 information and feedback sessions;
- 34 BMT Task Force meetings, office hours, small group discussions;
- 13 additional stakeholder engagements;
- Nine New York City Housing Authority (NYCHA) Red Hook Houses East and West engagements;
- 11 site tours;
- Five canvassing efforts in Red Hook with Green City Force; and,
- Three town halls.

A set of project goals were established at the outset of the planning and engagement process and subsequently refined to reflect community engagement and BMT Task Force feedback. The project goals are:

1. Maintain, modernize, and electrify the port so that it responds to 21st century industry trends, is financially self-sustainable, and supports the nascent Blue Highways initiative,
2. Provide a range of public open space throughout the Site,
3. Improve resiliency to prepare the Site and adjoining neighborhoods for sea-level rise and climate change,
4. Ensure the Atlantic Basin area includes active uses such as hotel, retail, and light industrial that support and benefit the Red Hook community and the city as a whole,
5. Ensure that housing on the Site is at a range of affordability levels and densities, and that the affordable housing is permanently affordable,
6. Improve the Site's connectivity with a focus on pedestrian-first strategies and designs, and a transportation network to help address vehicle congestion not only adjacent to the Site but also throughout the adjoining neighborhoods and improve bus speeds to intended rider destinations,
7. Ensure the project is financially viable and the port is well capitalized and that risks are mitigated throughout project implementation.

The *BMT Vision Plan* was approved on September 22, 2025, by the BMT Task Force. The *BMT Vision Plan* was the output of the BMT Task Force and public engagement process and serves as the reasonable worst case development scenario (RWCDS) with regard to certain improvements and proposed land uses.[6] The RWCDS will continue to be supported through ongoing planning and community consultation, namely with the to-be-established BMT Advisory Task Force (BMTATF), and through analyses and public comment on the environmental review process. The development framework set forth in the *BMT Vision Plan,* as further developed and refined, will

[6] The *BMT Vision Plan* includes programmatic, policy and workforce development components that are exempt from environmental review under SEQRA or may be impossible to analyze without further definition, design and/or specifics of the program. Regardless, any discretionary action subject to SEQRA in connection with the BMT project will be analyzed as required by the appropriate State or City agencies.

be the basis for ESD's initial adoption of the GPP. Once the Proposed Approvals are obtained, ESD's affirmation of the final GPP will guide implementation of the BMT Redevelopment Project, including authorizing the land transfers between governmental entities and the acquisition of private property where desired, and controlling the use, density, bulk and other relevant, interconnected aspects of the Proposed Project.

As established in the *CEQR Technical Manual*, the RWCDS represents the potential development scenario with the worst environmental consequences from the range of outcomes that are considered reasonable and likely. This analytical approach ensures that, regardless of certain unknown design details, the environmental impacts would be no worse than those evaluated in this environmental review. The RWCDS provides a conservative analytical framework that enables decision-makers, agencies, and community stakeholders to assess the maximum potential environmental effects of the proposed action while accounting for the inherent uncertainties in the specific design details and programming elements that will be refined through continued planning processes (see Section F, "Analysis Framework" for more details).

C. PROJECT DESCRIPTION

The Proposed Project is a comprehensive redevelopment initiative to create a new, modern, all-electric maritime port and vibrant mixed-use community within the Project Area.

As detailed in the Background section above, the Proposed Project reflects the recommendations and commitments of the *BMT Vision Plan* and would be codified and implemented as part of ESD's affirmation of a final GPP for the Project Area and eventually undertaken by the BMTDC. The GPP would authorize ESD to effectuate the real property transfers between the City and the Port Authority, authorize the acquisition of private property where necessary, and control the use, density, bulk and other relevant, interconnected aspects of the Proposed Project. The Proposed Project's major components are detailed below.

Figure 7 presents the Proposed Project's illustrative RWCDS within the Project Area. See Section F, "Analysis Framework," for more details on the RWCDS and analysis framework.

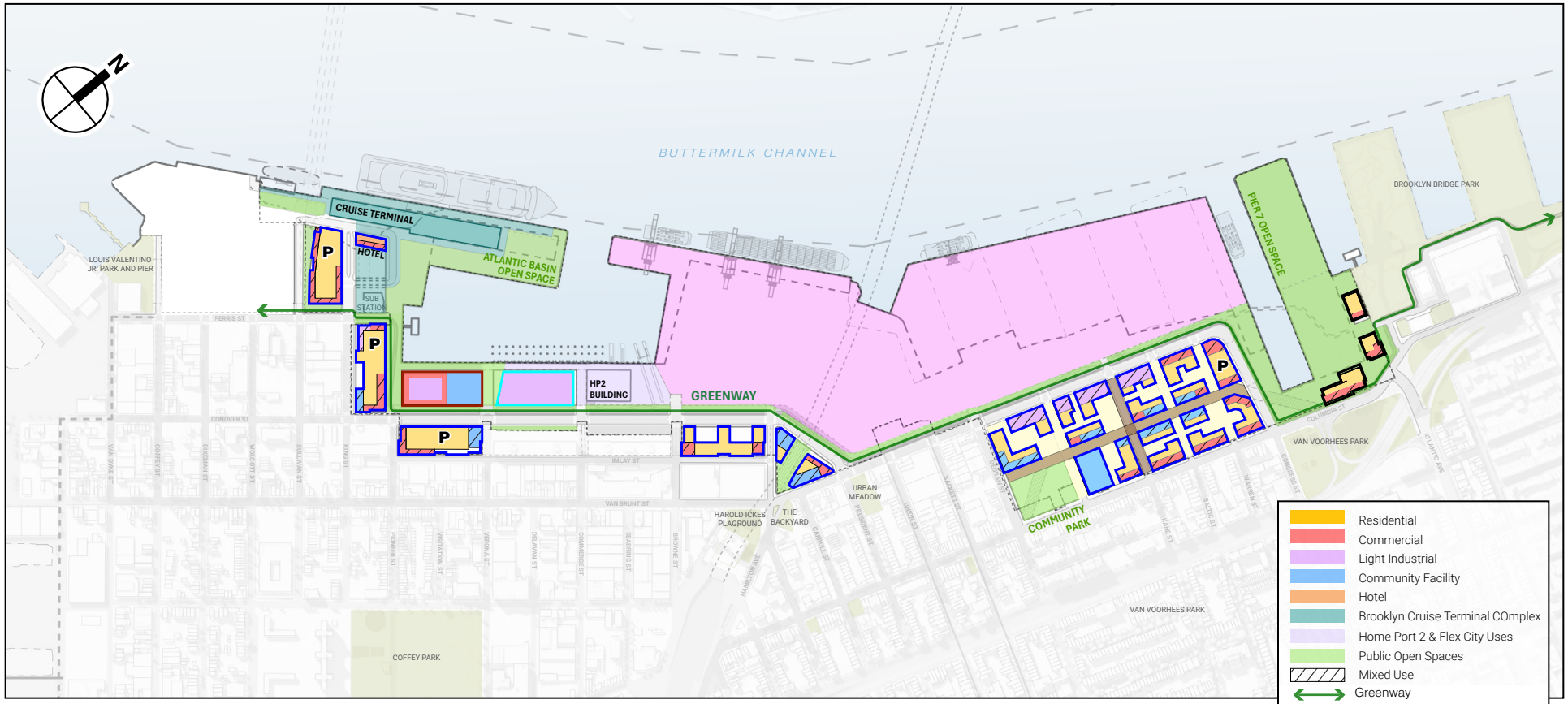
THE PORT

The Proposed Project would rehabilitate and redevelop critical City waterfront assets, resulting in the creation of a modern, all electric maritime port in New York's harbor. The future port will be fully electrified using clean energy through on-site renewable energy generation, electric cargo-handling equipment, and shore power; thereby reducing emission and noise levels in local communities. The Port shall include a container and flex terminal and a reimagined BCT as described below.

Container and Flex Terminal - Piers 10, 9A, 9B, and 8

As part of the *BMT Vision Plan*, port consultants Moffatt & Nichol (M&N) conducted analyses to understand the financial sustainability, operational efficiency, and infrastructure conditions of the Site with a goal of defining a financially and operationally sustainable model for the future port. The M&N analysis concluded that the ideal size of a modernized BMT port was 60 acres. A future operator at BMT will be able to increase the port's throughput and run a profitable container business once a series of investments have been made in port infrastructure, most importantly through the construction of a new marginal pier to serve as a flex terminal, providing room for growth in the container and bulk cargo business, while also supporting construction materials staging and other Blue Highways initiatives focused on zero-emission middle-to-last mile deliveries. With substantial public investment and a long-term lease, a new operator will be able

9.23.25



NOTE: The illustrative site plan shown here is a high-level overview of what is described in more detail in the DSOW, "Section C. Project Description." It should not be read in isolation from those specific, geography-based details, which were developed in conjunction with and to support the recommendations and commitments outlined in the BMT Vision Plan.

Vision for BMT Illustrative RWCDS Site Plan

EDC BROOKLYN MARINE TERMINAL

Figure 7

to privately finance further topside (i.e. surface and/or operational) improvements and all-electric equipment.

As discussed in the *BMT Vision Plan* and as a key step towards positioning the BMT port to attract significant private investment for its modernization, NYCEDC will seek expressions of interest (Request for Expression of Interest or RFEI) from port developers, port operators, and maritime industrial users with respect to the port and marine terminal facilities at the BMT. The responses are intended to gather information on additional proposed port configurations, gauge market interest in additional maritime industrial activities at the BMT port, and define a financially viable alternative to the Proposed Project. As determined by the RFEI responses, the BMTDC board may vote to define a program for a financially viable, larger port that reflects insights from the RFEI to be studied as an alternative during environmental review.

Pier 10 Rehabilitation

The Proposed Project would rehabilitate Pier 10 within its existing footprint, with critical structural work and preventative maintenance to bring the pier to a state of good repair and extend its useful life for at least 50 more years. Site 1 is integrated into the redesigned port and circulation plan.

New Marginal Pier at Piers 8 and 9

BMT's existing infrastructure is severely deteriorated, with significant investment needs. Piers 9a and 9b are condemned, while Pier 10 is operational but requires substantial investment to stabilize deteriorating piles and to bring an out-of-service crane back into operation. The finger pier configuration is obsolete for modern port operations, and the terminal has been disadvantaged by lack of public and private investments in pier infrastructure and handling equipment.

The Proposed Project would rebuild Piers 8, 9a, and 9b and restore a working waterfront facility by reconfiguring the three narrow "finger piers" into a single, expanded marginal pier that meets modern flex-maritime needs. The existing access channel and berth pockets are 40 feet in depth, which limits potential service, if the piers were active, to smaller vessels. Today's modern, larger vessels cannot effectively use the finger piers with their narrow horizontal shoreline and berth pockets.

The Proposed Project would reconfigure the finger piers into a new Pier 9, a marginal pier similar to Pier 10. The proposed new marginal pier has been designed for maximum flexibility to accommodate both international cargo ship operations (container and bulk) and cross-harbor barging of containerized freight and Blue Highways freight—an emergent regional maritime network for transporting bulk freight, microfreight, and other goods using New York Harbor. The new marginal pier will be raised to protect the port from 2100's sea-level rise and frequent storms, ensuring resiliency into the future and helping mitigate the impact of sea-level rise and storm surges on operations.

The Blue Highways initiative is a joint effort between the NYCDOT and NYCEDC to create a freight network using waterways and sustainable modes for zero-emission middle-to-last mile deliveries, reducing congestion on roadways and promoting more sustainable freight solutions. NYCEDC and NYCDOT are continuing to evaluate the feasibility of activating public and private sites for Blue Highways landings, freight patterns, network usage, and opportunities for public-

private partnerships to support capital investment and operations. BMT will be a key node in the citywide Blue Highways initiative using barges, fast ferries, and zero-emission vehicles.[7]

Pier 11

Pier 11 would continue to contain Homeport II, which would maintain its presence in a 42,000-gsf maintenance facility serving the Citywide Ferry Service. Pier 11 is also within the *Atlantic Basin District* and is proposed to include new industrial, commercial, community facility and open space, described in more detail below.

A Reimagined BCT - Pier 12

The Proposed Project would create a new purpose-built BCT at Pier 12 within the *Atlantic Basin District*, described in more detail below. An approximately 170,000-gsf cruise terminal would include enhanced areas for loading/unloading and pick-ups/drop-offs along with adjacent supportive and synergistic uses including waterfront open space, hotel, and commercial uses, and a structured parking garage (approximately 500 spaces equivalent to current BCT parking capacity). Pier 12 is also in need of significant investment to bring the facilities up to a state of good repair. The terminal infrastructure has deteriorated over time, with outdated passenger facilities, inadequate structural elements, and systems requiring modernization. At the same time, the global cruise market has rebounded from the pandemic and continues to grow, with forecasts projecting steady growth in the future.

Port-Related Traffic and Circulation Improvements at Two Key Intersections

The Proposed Project would improve two intersections that are critical points of ingress/egress and circulation to and from the BMT, supporting both BMT freight and ferry/cruise access. The specific intersections are outlined below. Pedestrian safety and wayfinding would be prioritized in the reconstruction of each intersection.

- Hamilton Avenue intersection – this improvement would consist of the redesign, realignment and reconstruction of the Summit Street, Hamilton Avenue, and Van Brunt Street intersection, which serves as the main entrance to the RHCT today but will become the primary ingress/egress point for all vehicles in the future. The improvements would support increased freight traffic; direct more freight and vehicular traffic to the Brooklyn Queens Expressway (BQE); integrate a greenway into Van Brunt Street; and support future integration of resiliency measures while maintaining an efficient main freight entrance to the Site.
- Ferris Street, King Street and Clinton Wharf intersection - this improvement would consist of a redesign to support multimodal traffic to and from the NYC Ferry stop and BCT to better accommodate queuing and reduce bottlenecks. The improvements would: alleviate the bottleneck created by the single-vehicle access gate; designate Bowne Street as a dedicated RHCT exit while redirecting cruise and ferry traffic to other access points; create new turning lanes and alignments to enable circulation enhancements; create added capacity to accommodate future growth in cruise terminal and NYC Ferry traffic; and add a greenway to support active transportation along Ferris Street.

Today, the entrances to the Port are set up in an inefficient manner with an entrance off Union Street and then another entrance and exit from Hamilton Avenue. A new port entrance and exit at

[7] As specific Blue Highway nodes are identified and developed by NYCDOT and NYCEDC, environmental review will be undertaken and coordinated between any known and active projects to analyze the potential for cumulative impacts.

the Hamilton Avenue and Bowne Street intersections will direct truck traffic toward Hamilton Avenue providing direct access to the BQE and aim to reduce neighborhood traffic at the intersection of Columbia Street and Atlantic Avenue.

FUTURE BMT PORT OPERATIONS WITH THE PROPOSED PROJECT

BMT is envisioned to benefit from a single port operator assuming full operational controls for the container, cruise, and flex maritime terminals together as a single commercial port area, allowing for increased efficiency, private investment in the port and financial sustainability. Following ESD's affirmation of the final GPP, and pending the outcome of the Port RFEI, it is anticipated that BMTDC[8] will release a Request For Proposals (RFP) for a port operator; the operator RFP will offer a long-term lease with the expectation of significant private investment in top-side equipment, structures, and land-rental payments to compensate for public investment in port infrastructure.

With substantial public investment and a long-term lease, a new operator will be able to privately finance further topside improvements. A new marginal pier, modernized infrastructure and equipment, paired with densified operations, better site circulation and a long-term operator will allow BMT to increase throughput to the point where it will operate without subsidy and provide payments through a new lease structure. Based on these improvements and operational changes, the port is projected to potentially achieve approximately 170,000 containers per year.

The future 60-acre BMT Port will support a range of maritime activities, including container, cruise, bulk cargo, construction staging, and project cargo. The redeveloped port will be positioned to support an increased share of the handling of the imported perishables and foodstuffs cargo volumes destined for New York City, including acting as a key node within the city's nascent Blue Highways network. Containers arriving on international container vessels will be directly transloaded onto an adjacent barge at BMT, avoiding the need for trucks to leave the gate. The 150-container barge expected to service BMT on a daily basis would eliminate approximately 300 one-way truck trips through Red Hook and allow BMT to operate in sync with future Blue Highways services at Hunts Point leveraging the Hunts Point Food Distribution Center, the city's largest food distribution center. Refrigerated containers will be shipped by electrified barge operations from BMT to Hunts Point where the cargo will enter the city food supply chain via water rather than via the road network as it does today. Last-mile deliveries by e-truck or e-cargo bikes moved by barge or fast ferry will take place along the city's waterfront. As noted above, the Blue Highways initiative is in its nascent and emerging stages; as specific Blue Highway nodes are identified and developed by NYCDOT and NYCEDC, environmental review will be undertaken and coordinated between any known and active projects to analyze the potential for cumulative impacts.

MIXED-USE RESIDENTIAL DEVELOPMENT

As shown in **Figure 7**, the Proposed Project includes mixed-use residential development upland from the Port. The mixed-use development would include market rate and affordable residential dwelling units, retail, hotel, community facility, light industrial/maker space, and district parking. The mixed-use districts include a substantial amount of new open space and infrastructure improvements to support the proposed new development.

[8] After ESD's affirmation of a final GPP, it is anticipated per the *BMT Vision Plan* that BMTDC will be responsible for issuing RFPs and making future developer selections.

The Proposed Project's mixed-use districts are divided into BMT North and the Atlantic Basin.

BMT North

BMT North is generally located north of Degraw Street, east of Van Brunt Street, west of Columbia Street and south of Atlantic Avenue. BMT North consists of Pier 7, underutilized uplands portions of Piers 8, 9A, and 9B and adjacent NYCDOT-owned parcels (Site 2).

BMT North is envisioned as a vibrant, mixed-use extension of the existing Columbia Street Waterfront neighborhood with new homes, public open space, active commercial and light industrial uses, a public school, and a range of open spaces. Utilizing various planning and design tools from building massing and active ground-floor uses, to new open spaces and street network, BMT North is proposed to be a pedestrian-forward community. Kane Street and Congress Street will be the main connections into BMT North from the Columbia Street Waterfront neighborhood, completing a green and walkable street grid that is pedestrian focused.

Columbia Street is envisioned to be lined with active ground-floor uses, such as retail and community facilities. Van Brunt, which today ends at Degraw Street and is directly across from the new, revitalized port, would be lined with ground-floor light industrial and commercial space, which could include creative/maker space, providing space for a range of businesses that generate jobs for the local community. Community facilities and public amenities would be focused on central pedestrian-oriented streets, including a new public school and a new neighborhood-scale public open space. The new neighborhood park would be located at the corner of Degraw Street and Columbia Street, becoming a welcoming gateway to BMT North. The proposed new school would be located just north and adjacent to the new park. Pier 7 would be rebuilt as a destination park, designed to be integrated into and complement the adjacent Brooklyn Bridge Park (BBP).

Overall, BMT North could include up to approximately 3,800 DUs, of which approximately 1,520 DUs would be permanently affordable to low- and moderate-income New Yorkers. Of the BMT North units, Pier 7 uplands could accommodate a maximum of 1,000 units. A minimum of 40 percent of all housing units will be permanently affordable at an average Area Median Income (AMI) at or below 60 percent overall, with at least 10 percent at 40 percent of AMI and no affordable units above 100 percent of AMI. BMT North also includes approximately 17 acres of new destination and neighborhood open space is proposed along with approximately 55,000 sf of light industrial space, 75,000 sf of commercial space and 130,000 sf of community facility space.[9]

As shown in **Figure 7,** most of the Proposed Project's mixed-use residential buildings within BMT North would be located west of Columbia Street between Degraw and Congress Streets; buildings in this area could rise to a height of up to approximately 325 feet. Development on the Pier 7 uplands could rise to a height of up to approximately 425 feet. There would be a variety of building types and sizes throughout BMT North. Buildings' heights would be sensitive to adjacent contexts, with building base heights and setbacks designed to ensure open space, light, and air. The bases of buildings along Columbia Street would be a maximum of 65 feet tall, which is approximately the height of the buildings within the neighborhood to the east. Taller buildings would be located farther away from Columbia Street, either in the middle of BMT North, or along the new extension of Van Brunt Street.

[9] All square footage listed is derived from the approved *BMT Vision Plan* (September 22, 2025) and is the basis of the RWCDS, which includes a conversion rate to account for the potential gross square footage of buildings. Specific building plans are not yet developed.

Atlantic Basin

The Atlantic Basin District is generally located around Pier 12, the Atlantic Basin and upland portions of Pier 11 to Imlay and Van Brunt Streets south of President Street.

The district is envisioned as a vibrant waterfront destination and mixed-use community with a mix of industrial uses, housing, hospitality, entertainment/commercial, and public open space. The vision for Atlantic Basin would transform what is currently an isolated area accessed by a semi-private road at Bowne Street into an integrated part of the broader Red Hook waterfront.

The district's programming varies, with Pier 12 anchored by a purpose-built Brooklyn Cruise Terminal featuring modern cruise ship facilities integrated with waterfront access areas and new destination public open spaces. An adjacent hotel is proposed and would contribute to Red Hook's economy while also helping to alleviate vehicle demand and traffic by reducing the overlap of embarking and debarking cruise passengers. The area around Pier 11 would be activated with a combination of NYC Ferry operations within Homeport II, new waterfront public open space and ground-floor commercial and industrial spaces. Pier 11 is proposed to include industrial and maritime industrial uses alongside the mixed-use community programming. An experiential learning center and workforce center would be located in community facility space at Pier 11. New housing in mixed-use buildings would be located upland of Piers 11 and 12 along Imlay, Van Brunt, Conover and Ferris Streets; ground-floors would be activated by commercial and community facility uses.

Overall, the Atlantic Basin district could include up to a maximum of 2,200 housing units, of which approximately 880 DUs would be permanently affordable to low- and moderate-income New Yorkers. A minimum of 40 percent of all housing units would be permanently affordable at an average AMI at or below 60 percent overall, with at least 10 percent at 40 percent of AMI and no affordable units above 100 percent of AMI. Atlantic Basin also includes approximately 11 acres of new public open space along with approximately 220,000 sf of industrial space (at discounted rents), 200,000 sf of commercial space, 120,000 sf of community facility space, and a hotel with up to 400-keys.[10] An experiential learning center and workforce center would be located in community facility space at Pier 11.

As shown in **Figure 7**, building heights would vary throughout the district. Along Pier 11, the non-residential buildings would be lower-rise structures of two to three stories with larger footprints, designed to accommodate industrial uses. Along Imlay Street, buildings would feature a stepped design with mid-rise portions of approximately 65 feet matching the existing Imlay Street building heights, while tower portions could reach maximum heights of 165 to 215 feet. The district's tallest structures, reaching up to 325 feet, would be located near the new Cruise Terminal.

PUBLICLY ACCESSIBLE OPEN SPACES

The Proposed Project proposes a comprehensive network of publicly accessible, resilient open spaces that would transform the currently fenced-off waterfront site into a cohesive public realm. The Proposed Project would establish nearly 30 acres of new destination and neighborhood open space, which includes a roughly mile-long greenway and over 5,000 linear feet of public waterfront access. This extensive open space system serves multiple critical functions, including

[10] All square footage listed is derived from the approved *BMT Vision Plan* (September 22, 2025) and is the basis of the RWCDS, which includes a conversion rate to account for the potential gross square footage of buildings.

as a social and mobile connective tissue, linking BBP to Atlantic Basin and serving both local residents and visitors from surrounding communities and beyond.

In BMT North, 17 acres of new open space would be provided including an 11-acre destination park located around Pier 7. The Pier 7 park would be designed to provide sufficient scale for diverse programming and activities while offering direct waterfront access. In the Atlantic Basin district, 11 acres of new waterfront park would be built around the new cruise terminal, wrapping around Piers 11 and 12. This strategic placement would help activate the southern portion of the Site, providing public amenities that complement and integrate with maritime uses. Outside of the larger, destination open spaces, smaller-scale neighborhood parks and public plazas would serve multiple functions in addition to recreation and passive open space, like helping to manage stormwater on-site and reduce the heat-island effect. Neighborhood parks would provide essential green infrastructure while creating gathering spaces at a more intimate scale, supporting daily life for residents and workers in the mixed-use districts.

The greenway would be a critical linear park element improving safety by separating pedestrians, bikes, and micromobility, all of which today are intermingled on the existing Brooklyn Greenway. Beyond its transportation function, the greenway will also provide an opportunity to serve as a buffer between the port and mixed-use residential development; directly integrate flood defense measures and stormwater management; and help mitigate the heat-island effect through landscaping and additional tree canopy.

Open space programming and design decisions, including the allocation of active versus passive recreation areas, would be developed by the BMTDC and BMT Advisory Task Force (BMTATF) through a community consultation process. BMTDC would be responsible for funding the construction, maintenance, and operations of public open spaces, or contracting with outside entities to undertake such operations, at BMT.

INFRASTRUCTURE AND RELATED COMPONENTS

The Proposed Project would be supported by upgrades and investments in neighborhood resiliency and infrastructure systems.

Circulation, Transit and Parking

The *BMT Vision Plan* presents a balanced mobility approach that fundamentally reimagines how people and goods move through the Site and surrounding neighborhoods. As noted above, the Proposed Project aims to create a new, modern, all-electric port alongside a vibrant, pedestrian-forward mixed-use residential and recreative community. The Proposed Project appropriately segregates the industrial, truck-intensive uses at the Port from the mixed-use residential uses and open spaces that are integrated with the commercial, industrial and cruise terminal uses around Piers 11 and 12.

Freight circulation would be strategically reconfigured to minimize effects on local communities while maintaining efficient port operations. A new entrance to the Port would be located at Hamilton Avenue with a new exit from the Port at Bowne Street, which together would direct Port truck traffic toward the BQE and away from neighborhood streets. The Proposed Project also incorporates sustainable freight practices, including utilizing flex-maritime terminal space for freight consolidation and micro-distribution hubs to help reduce the total number of delivery vehicles moving through the Site.

Pedestrian and bicycle infrastructure is critical to the Site's circulation strategy. Van Brunt Street, which today ends at Degraw Street, would extend north to Congress Street where it would wrap

around and meet Columbia Street. Running adjacent to the proposed extension of the redesigned Van Brunt Street would be a wider, safer, and greener greenway, one that is closer to the waterfront and provides adequate space for bikes and pedestrians.

The Proposed Project will result in new roadways and redesigned streets that will provide quality pedestrian experiences. Buildings will be lined with active uses, and the mixed-use districts will be knit together by a framework of pedestrian-oriented streets. Open spaces, waterfront parks, and plaza spaces will create a people-centered public realm. Per the *BMT Vision Plan*, some points of the BMT Project Area dedicate almost 70 percent of the street for pedestrians and cyclists. The streets will be designed for pedestrian and transit priority, and at a neighborhood scale. Beyond the BMT Project Area, the *BMT Vision Plan* includes commitments to enhancing pedestrian and bicycle connectivity at intersections and streets along the BQE corridor, improving conditions under the elevated highway, and capping portions of the highway to expand green spaces and connectivity. Additionally, NYCEDC will coordinate closely with NYCDOT to consider concepts that optimize street safety, traffic flow, and interaction with the Brooklyn Queens Expressway.

The *BMT Vision Plan* outlines key improvements and interventions to support the envisioned growth and address the Site's current isolation from the subway network. A series of bus priority treatments on Columbia Street and Van Brunt Street could improve the B61's frequency, speed, and reliability, making transit connections easier. For instance, improvements that could support bus frequency, speed and reliability may include dedicated bus lanes, traffic signal priority, and automated enforcement mechanisms. As described in the *BMT Vision Plan*, up to $50 million in total funding would be provided for an electric shuttle service across the Site that would provide a direct connection between the Site and subway stations. It is envisioned that this shuttle service would serve as a bridge solution while the City and community advocates for enhanced MTA bus service to meet future ridership demands.

Off-street parking would be provided on a district basis. No minimum amount of parking would be required to be provided for residential, commercial, light industrial, or community facility portions of the development. Instead of individual parking garages for each building, centralized shared parking facilities will serve multiple uses, maximizing efficiency while minimizing the footprint dedicated to automobile storage.

Resiliency and Climate Change

Hurricane Sandy illustrated how vulnerable the neighborhoods around BMT, particularly Red Hook, are to extreme storm events and future sea-level rise. Threats from heat and extreme rain events are also present and are only projected to get worse in the future. The *BMT Vision Plan's* proposed resiliency infrastructure represents a comprehensive, multi-layered approach to climate adaptation that addresses coastal flooding, stormwater management, and extreme heat. The Proposed Project presents a unique opportunity to design a comprehensive and integrated protection strategy, one that integrates flood and stormwater resiliency directly into new development, streets, and open spaces.

Within the mixed-use areas, the first floor of any new development will be several feet higher than the existing grade, and new developments may include on-site stormwater retention tanks. Any new street on the Site will be elevated as much as possible to protect against storms. Neighborhood open spaces will have flood defenses directly integrated into their design. These defenses will include a flood wall within an elevated greenway, appropriate landscapes and plantings, and green and hybrid stormwater infrastructure.

The coastal protection strategy builds upon the City's ongoing Red Hook Coastal Resiliency project (RHCR). RHCR is independent of the BMT Redevelopment Project and is fully funded. RHCR includes two main components—the Beard Street component and the Atlantic Basin component—the latter includes portions of the BMT Site. The RHCR project maintains a passive system at an elevation of eight feet and includes deployable features to reach an elevation of 10 feet. There will be a system of floodwalls, raised street grades, deployable flood gates, and supporting infrastructure that ties into existing topographic high points.

The Proposed Project supports the urgent need to protect against coastal flooding by elevating streets and development sites and building a flood-barrier system the length of the BMT Site. The flood-barrier system would run along the redesigned Conover and Van Brunt Streets and would have a design elevation based on a year 2100, 100-year storm. This forward-looking design would ensure that BMT remains viable despite projected sea-level rise of up to six feet by 2100.

BMT would also manage stormwater drainage on-site and could improve conditions upland by directly integrating stormwater management into the future port, new development, streets, and open spaces. The approach would use both green and gray infrastructure systems, with hybrid green infrastructure, gray stormwater retention systems, and stormwater catchment strategies directly integrated into building designs. New open spaces would manage stormwater through best practices for retention and detention. Any runoff would be discharged directly to the harbor, avoiding taxing the existing drainage system.

The Proposed Project addresses extreme heat through substantial investments in new open spaces and lining new streets with street trees. New neighborhood streets would be lined with new street trees that would help to minimize heat-island effect. This distributed approach to heat mitigation works in concert with the extensive open space network to create a more comfortable microclimate throughout the district.

Lastly, Port decarbonization represents another critical resiliency strategy, addressing both climate mitigation and local air quality. The port will be fully electric with expanded shore power and other electric equipment, which will reduce fossil fuel dependence. This transition to electric port operations will reduce emissions while creating a quieter operating environment for adjacent residential uses.

D. REQUIRED APPROVALS

The Proposed Project is expected to require the City, State, Federal and other approvals described below, which collectively comprise the Proposed Approvals. Approvals marked with an asterisk (*) are discretionary actions that require review under SEQRA and CEQR.

STATE APPROVALS

1. ESD adoption and affirmation of a GPP, including overrides of the New York City Zoning Resolution (ZR) pursuant to the New York State Urban Development Corporation (UDC) Act. The GPP would establish Design Guidelines for the Proposed Project that would address among other things, use, bulk and dimensional parameters that would be applied in lieu of zoning. Relevant components of the Proposed Project would be required to comply with the Design Guidelines.*
2. Approval by the Public Authorities Control Board (PACB) of ESD’s acquisitions of property from the City and the Port Authority, among other potential approvals.*
3. Disposition of property from the City to ESD and subsequent potential disposition of fee title and/or leases to such property.*

4. Disposition of property from PANYNJ to ESD and subsequent potential disposition of fee title and/or leases to such property. (Please note PANYNJ is public corporation formed by a bi-state compact between the states of New York and New Jersey.)*
5. Approval by New York State Department of Environmental Conservation (DEC) of certain permit applications and issuance of permits, potentially including a State Pollution Discharge Elimination System (SPDES) permit for discharges of groundwater during construction.*
6. Coastal Consistency Review with the New York State Coastal Management Program by New York State Department of State.
7. Acquisition of property interests by ESD requiring ESD approvals and the making of related statutory findings under the UDC Act, SEQRA, and for any property interests designated for acquisition by eminent domain, compliance with and the making of statutory findings pursuant to the Eminent Domain Procedure Law (EDPL).*
8. Potential State Legislation related to residential leasehold condominiums under the New York Condominium Act and Payments in Lieu of Taxes (PILOT).
9. Potential approvals relating to exemptions from real property taxes and the use of PILOT.
10. Potential PANYNJ Board authorizations in addition to the 2024 PANYNJ Board authorization.
11. Office of General Services Permit to occupy state-owned lands underwater.
12. Authorization of state funding for additional commitments.*

CITY APPROVALS

1. Approval by the NYC Mayor's Office of Contract Services (MOCS) for disposition of City-owned property, pursuant to a GPP.*
2. Approval by the NYC Department of Transportation (NYCDOT), NYC Department of Environmental Protection (NYCDEP) and NYC Department of Parks and Recreation (NYC Parks), NYC Department of City Planning (NYCDCP), and other city agencies for public improvements, as applicable.
3. Potential approval by the New York City Board of Standards and Appeals (BSA) for construction within the bed of a mapped street.*
4. Authorization of potential funding, financing, and/or financial assistance by the NYC Industrial Development Agency (IDA), NYC Office of Management and Budget (OMB), NYC Department of Housing Preservation and Development (HPD), NYC Housing Development Corporation (HDC), and/or other City agencies.*
5. Coordination with the New York City Department of Design and Construction (DDC) on the Red Hook Coastal Resiliency (RHCR) project and approval of easements related to the RHCR project, as necessary.*
6. Coastal Consistency Review with the New York City Waterfront Revitalization Program by City Planning Commission, in its capacity as the City Coastal Commission.
7. Authorization of potential funding, financing, and/or financial assistance, and/or capital improvement by the Metropolitan Transportation Authority (MTA), New York City Transit Authority (NYCTA), and/or other State agencies for additional commitments.*

FEDERAL APPROVALS

1. Federal grant disbursement by the U.S. Department of Transportation (USDOT) Maritime Administration (MARAD).[11]
2. Joint Permit Application (JPA) and related consultations and approvals from the U.S. Army Corps of Engineers (USACE).
3. Coordination and potential approvals from the U.S. Coast Guard (USCG) for construction in and over navigable waters.
4. Coordination and potential approvals from U.S. Customs and Secret Services to relocate uses on-site.
5. Coordination and potential approvals from U.S. Department of Housing and Urban Development (HUD) on Community Development Block Grant Disaster Recovery (CDBG-DR) funds for substations.
6. Coordination and potential approvals from U.S. Federal Emergency Management Agency regarding flood plain assessment and mapping certification.
7. Coastal Consistency Review with the Coastal Zone Management Act.

The Proposed Project would also include various consultations, reviews, disclosures, and/or ministerial actions required by City, State, and Federal agencies. For example, ESD will consult with the City as required by the UDC Act in connection with the GPP, including, among other things, with respect to certain design and program parameters in lieu of zoning, and construction of the public realm improvements within City-owned mapped streets, which would involve coordination with NYCDOT and consultation with DCP.

The *BMT Vision Plan* includes off-site commitments which will be analyzed and implemented in the future by separate parties. Such off-site commitments include but are not limited to affordable housing preservation and/or creation in Community Board 6, funding for NYCHA Red Hook Houses East and Red Hook Houses West, industrial development within the broader Red Hook neighborhood, off-site commitments to activating Blue Highways, off-site capital improvements to parks and schools, and preservation of nearby industrial sites. Any parties implementing such projects requiring discretionary approvals will be responsible for completing environmental analysis, as necessary, when details and specific designs of improvements are developed.

E. PROJECT PURPOSE AND NEED

The overarching purpose of the Proposed Project is to address substandard conditions within the Project Area and, subsequently, to contribute to and substantially support the economic, social, and recreational success of Brooklyn and the City of New York overall. The *BMT Vision Plan* establishes and details the Proposed Project. The Proposed Approvals are necessary because the fragmented ownership and existing land use patterns and zoning regulations do not permit for the implementation of the *BMT Vision Plan*. Current land use and development patterns have been shaped by historic land and pier configurations and the existing zoning that has been in place since 1961. Coupled with deteriorating, obsolete infrastructure and operational constraints, the current conditions prevent the BMT from realizing its full potential as a community and regional asset. Without the Proposed Approvals, the Brooklyn Marine Terminal would remain underutilized, with limited redevelopment potential and economic activity and no market-rate or income-restricted

[11] The provision of these federal funds will require assessment pursuant to the National Environmental Policy Act (NEPA) which will be conducted concurrently with MARAD as lead agency.

housing, community amenities, and waterfront public access and deliver only limited infrastructure improvements. The Proposed Project will transform this long underutilized and neglected site by unlocking both public and private investment.

The Proposed Approvals are needed to revitalize the working waterfront. New industrial and maritime development has generally been dis-incentivized by the fragmented ownership patterns and short-term lease structures coupled with the existing zoning's relatively low permitted densities and high parking, loading, and other requirements. The Proposed Approvals would allow for strategic planning and implementation of BMT's long-term future including facilitating the redevelopment of and reinvestment in maritime infrastructure to support both modern cargo operations and growing cruise operations, enabling the terminal to increase its throughput and meet the City's Blue Highways programmatic goals.

As New York City's economy and population continue to change, the City is additionally challenged with addressing a shortage of all types of housing, especially apartments affordable to low- and moderate-income New Yorkers. Currently, the Project Area is zoned for industrial and commercial uses, which do not allow residential uses as-of-right. Over the past century, industrial and manufacturing uses that historically defined the area have steadily declined, leaving vacant buildings/lots, storage, and parking facilities. Recent development consists mainly of large, truck-intensive last-mile facilities or movie/production studios. In areas proposed to allow new residential use, the Proposed Approvals would promote the development of housing and facilitate mixed-income communities by requiring permanently affordable housing units be included in any new residential development. This on-site strategy is complemented by the housing commitments made in the *BMT Vision Plan* regarding establishing a $75 million fund for capitally eligible projects that preserve or create affordable housing within CB6, reserving on-site units and providing rental subsidy, as needed, for nearby NYCHA residents, committing $200 million in funding for capitally eligible campus improvements at NYCHA Red Hook Houses East and West, and reserving 50 affordable units at BMT for NYCHA Wyckoff and Gowanus Houses residents.[12]

The Project Approvals also allow for a comprehensive approach to resiliency along a vulnerable, low-lying waterfront. The BMT's location along the Red Hook peninsula makes it highly vulnerable to climate change impacts, including sea level rise and increased storm events. The New York City Panel on Climate Change (NPCC) projects high-end (90th percentile[13]) estimates for sea level rise of 2.5 feet in the 2050s, 4.83 feet in the 2080s, and 6.2 feet in 2100, relative to 2000–2004 sea levels, which would dramatically increase the risk of similar or worse flooding events in the future. The Proposed Approvals would facilitate the implementation of resilient infrastructure and sustainable development practices to address these challenges, protecting vital waterfront assets, supporting the City's coastal defense strategy outlined in "One New York: the Plan for a Strong and Just City," and complementing other resilience measures underway in Red Hook.

[12] As the details of the housing commitments are developed by BMTDC, the responsible parties and agencies would undertake environmental review and seek approvals, as applicable.

[13] The 90th percentile accounts for the most conservative risk assumption; essentially the worst case of projections.

GOALS AND OBJECTIVES

The Proposed Approvals aim to achieve the following goals and objectives, which reflect the guiding principles[14] listed in the *BMT Vision Plan* and bolster the project's purpose and need:

1. **Maintain, modernize, and electrify the port so that it responds to 21st century industry trends, is financially self-sustainable, and supports the nascent Blue Highways initiative**
   - Design a modern flexible port to handle a range of maritime activities, respond to market demands, and promote food security by rebuilding deteriorated pier infrastructure and developing a state-of-the-art maritime port with modern container operations that increases capacity while using land more efficiently and provides flexibility to handle international cargo
   - Advance a Blue Highways barge service from BMT to Hunts Point to improve BMT's value proposition, and to reduce truck traffic, through infrastructure for micro-distribution strategies and intra-harbor barging services
   - Create an electrified port designed to be resilient into the future
   - Redesign circulation to mitigate port-traffic impacts on surrounding communities
   - Leverage planned investments and a new operator model to create a financially sustainable port and ensure access to good jobs
   - Leverage agreements with cruise lines to support community priorities
2. **Provide a range of open space throughout the Site**
   - Design BMT to have a range of public open space types, all of which will all be publicly accessible Improve connections between the waterfront and adjacent neighborhoods
   - Create a new destination park
   - Activate the Atlantic Basin with a waterfront park
   - Locate neighborhood parks throughout the sub-districts to provide a range of programming
   - Connect Brooklyn Bridge Park and Atlantic Basin with a new greenway
   - Incorporate resiliency into all open spaces at BMT
   - Create high quality and well-maintained open spaces
   - Facilitate brownfield remediation to address historical contamination and create safe, healthy environments for future development and public spaces
3. **Improve resiliency to prepare the Site and adjoining neighborhoods for sea-level rise and climate change**
   - Redevelop BMT with a comprehensive multi-layered flood-protection system by building resilient infrastructure to protect against impacts from sea level rise and climate change
   - Manage drainage on-site to meet best practices
   - Decarbonize the port at BMT
   - Design streets and open spaces to mitigate the heat-island effect

[14] The *BMT Vision Plan* includes comprehensive principles across all topic areas; principles listed are most relevant to the Purpose and Need rationale of the Proposed Project's environmental review.

- Integrate with and contribute to neighborhood-wide coastal resiliency systems, including coordination with the Red Hook Coastal Resiliency initiative
- Address environmental justice concerns through reduced truck traffic and improved environmental quality by shifting from truck-based freight to more sustainable water-based modes
- Support the City's Green Economy Action Plan through sustainable development practices
- Elevate the entire Site further helping with coastal defense
- Incorporate stormwater drainage infrastructure in public open space to help address impacts from rain and storm events

4. **Ensure the Atlantic Basin area includes uses such as hotel, retail, and light industrial that support and benefit the Red Hook community and the city as a whole**
   - Create a new activated waterfront district around Atlantic Basin with publicly accessible waterfront open space, housing, a hotel, entertainment/commercial spaces, and a new cruise terminal; this mix of uses are intended to support economic diversity and resilience
   - Extend neighborhood streets and activate street ends to connect the community
   - Integrate waterfront public open space and access in Atlantic Basin.
   - Integrate resiliency measures within the buildings, the public open space, and the new extension of Conover Street, protecting the Site and buildings from sea-level rise and future storm surge events
   - Create new jobs in maritime, transportation, and related industries
   - Support tourism and hospitality industries through cruise terminal improvements and new hotel development
5. **Ensure that housing on the Site is at a range of affordability levels and densities, and that the affordable housing is permanently affordable**
   - Develop housing and mixed-use areas on land freed up by more efficient maritime operations
   - Build housing in an amenity-rich, high-opportunity area
   - Ensure that future development reflects the *BMT Vision Plan's* commitments for the Proposed Project through the direction and leadership of BMTDC
   - Offer a range of different housing types and affordability levels
   - Deliver various building types to reflect existing neighborhood character
   - Integrate resilient design and materials in housing plans
6. **Improve the Site's connectivity with a focus on pedestrian-first strategies and designs, and a transportation network to help address vehicle congestion not only adjacent to the site but also throughout the adjoining neighborhoods and improve bus speeds to intended rider destinations**
   - Create a pedestrian-forward district
   - Improve cycling infrastructure on-site and connect to the existing neighborhoods
   - Design site circulation to minimize traffic effects on local community
   - Support alternatives to heavy freight traffic to move goods to and from BMT through a variety of techniques, including Blue Highways, micro-distribution hubs, and site design and management

- Improve transit access within the local community and to the subway
- Continue transportation agency coordination to ensure proper planning and implementation
- Use cutting-edge measures to help reduce the reliance on private automobiles and for hire vehicles:
- Support the expansion of Blue Highways intra-harbor barging services to reduce road congestion

7. Ensure the project is financially viable and the port is well capitalized and that risks are mitigated throughout project implementation

- Ensure adherence to the *BMT Vision Plan's* commitment to a financially viable and self-sustaining development through BMTDC leasing and contracting
- Create new jobs in maritime, transportation, and related industries to support economic vitality
- Address substandard, insanitary, blighted, deteriorated, or deteriorating conditions within the Project Area in accordance with the UDC Act

In summary, the Proposed Project balances maritime operations with community needs, addresses existing infrastructure deficiencies, improves transportation systems, creates new public amenities, and supports economic development, while contributing to the broader social, environmental and resiliency goals of New York City.

F. ANALYSIS FRAMEWORK

The December 2021 Edition of the *CEQR Technical Manual* will serve as a guide on the methodologies and impact criteria for evaluating the Proposed Project's potential environmental effects. In disclosing impacts, the EIS considers the Proposed Project's potential adverse impacts on the environmental setting in the future, when the Proposed Project is built and operational. Therefore, the technical analyses and consideration of alternatives include descriptions of existing conditions, conditions in the future without the Proposed Project (the No Action condition), and conditions in the future with the Proposed Project (the With Action condition). The incremental difference between the No Action and With Action conditions is therefore the subject of analysis for evaluating the potential environmental impacts of the Proposed Project.

BUILD YEAR

The BMT Project is complex, large-scale project. Similar projects in New York City are typically analyzed over a 10-15 year build period, accounting for their complexity. The conceptual construction schedule was developed to allow for an assessment of the potential for significant impacts under reasonable worst-case conditions, which would involve the concurrent construction of maritime infrastructure upgrades, mixed-use residential buildings, and public open spaces, as well as the continued operation of the maritime terminal during construction and the phased occupancy of completed buildings, as appropriate. Therefore, for the purposes of the environmental review, it is assumed that the Proposed Project would start construction in 2026 following key approvals, and would be substantially operational in 2038. This timeframe supports a conservative analysis by assuming all development comes online within the foreseeable future and within typical agency capital and operational budget planning timeframes, consistent with *BMT Vision Plan* projections and other similar precedents.

THE FUTURE WITHOUT THE PROPOSED PROJECT (NO ACTION CONDITION)

Absent the Proposed Project, none of the Proposed Approvals would be sought or approved, and the Project Area would remain largely unchanged from its current state. Without the Proposed Approvals, BMT would remain underutilized, with limited redevelopment potential and economic activity and no market-rate or income-restricted housing, community amenities, and waterfront public access and deliver only limited infrastructure improvements.

Piers 7 and 8 would continue to deteriorate through lack of significant investment and, by the 2038 build year, would join Piers 9a and 9b as condemned and vacant. The upland portions of Piers 8 and 9 would continue to be utilized for non-maritime, open-industrial uses such as private aggregate storage, equipment storage, and parking. The container terminal on Pier 10 would remain operational and function in a similar capacity as it does today, without the replacement of Piers 9a and 9b. The currently vacant portion of the Pier 11 shed would be re-tenanted from a warehouse-distribution use to an industrial use; Homeport II would remain the same as its existing condition. Pier 12 and the BCT would maintain their current operations and existing conditions.

No Action assumptions were made for the additional sites adjacent to the BMT that are proposed for inclusion within the Project Area. Sites 1 and 2, which are the commercial-light-industrial warehouse along Van Brunt Street and the NYCDOT-owned parcels along the BMT periphery upland of Piers 9a & 9b, would both continue in their current operations and conditions.

THE FUTURE WITH THE PROPOSED PROJECT (WITH ACTION CONDITION)

The *BMT Vision Plan* is the basis for the Proposed Project's With Action condition and would be codified as part of ESD's final affirmed GPP for the Project Area and implemented by BMTDC. The GPP would control the use and upper range of density, bulk and other relevant, interconnected aspects of the Proposed Project's mixed-use development districts.

To provide a conservative analysis of potential environmental effects, the DEIS technical analyses will utilize a Reasonable Worst Case Development Scenario (RWCDS). The RWCDS is informed by the *BMT Vision Plan's* levels and types of programming, like maximum and minimum amounts and envelopes of density, and scope of improvements (as described above). Various aspects of the proposal, like the preferred traffic calming measures or the design and programming of new park space, will continue to be developed and refined through ongoing community consultation and results from the environmental review. Where aspects of the proposal will remain open or where flexibility is critical through implementation, like the specific allocation and location of land uses or building massings, the environmental review will utilize standards and key assumptions to ensure decision makers, agencies, and community stakeholders are provided with a conservative analysis and comprehensive assessment of the benefits and potential impacts of approving the Proposed Project.

As detailed in **Table 1**, under the RWCDS the Proposed Project would, by 2038, introduce to the Project Area approximately 3 million sf of maritime-industrial, cruise terminal, and port-related space; 8 million gsf of mixed-use residential, commercial, hotel, community facility and light-industrial space; and nearly 30 acres of new open space. The modern, maritime port would consist of an approximately 1.1 million sf container terminal, 1.5-million-sf of flex-maritime space, 115,000 gsf of warehouse/distribution space, 42,000 gsf of light-industrial space, and a 172,000-gsf cruise terminal with a 150,000-gsf accessory parking garage. Under the RWCDS, the Proposed Project's mixed-use component would consist of approximately 6,000 dwelling units (DU), of which approximately 2,400 DUs would be permanently income-restricted to low- and moderate-

income New Yorkers, 300,000 gsf of commercial space, 265,000 gsf of community facility space, 155,000 gsf of hotel space, and 282,000 gsf of light-industrial space.

Table 1

BMT Redevelopment Project Reasonable Worst-Case Development Scenario (RWCDS)

Use	No Action Condition	With Action Condition	Increment
Residential GSF	0	6,738,975	6,738,975
Total Dwelling Units (DU)	0	6,000	6,000
Affordable DU (60% AMI)	0	2,400	2,400
Commercial GSF	80,988	299,423	218,435
Hotel GSF	0	156,875	156,875
Hotel Keys	0	400	400
Community Facility GSF	0	264,395	264,395
Light-Industrial & Industrial GSF	14,000	295,695	281,695
Mixed-use structured parking GSF	0	431,225	431,225
Open Space (acres)	0	29.27	29.27
Cruise Terminal GSF	182,000	172,000	(10,000)
Cruise Terminal Garage GSF	0	150,000	150,000
Non-Maritime Warehouse/Distribution GSF	159,337	115,000	(44,337)
Container/Flex Terminal SF	1,000,000	2,574,396	1,574,396
Open Yard / Parking / Storage SF	1,594,530	0	(1,594,530)
Homeport II GSF	42,000	42,000	0
Vacant Building/Land/Condemned Piers SF	1,038,470	0	(1,038,470)
Surface Parking SF	299,692	0	(299,692)
Total GSF	478,325	8,665,588	8,187,263
Total GSF + SF	4,411,017	11,239,984	6,828,967

Note:
Specific building plans are not yet developed. For conservative analysis purposes, the RWCDS projections include standard conversion rates from square footage to gross square footage to account for common area spaces (i.e., internal circulation, elevators, stairwells, HVAC, void spaces, etc.). This GSF conversation is necessary for modeling the worst-case scenario to accommodate the specific Vision Plan programmatic requirements.

G. ENVIRONMENTAL REVIEW PROCESS

CEQR AND SEQRA OVERVIEW

New York City has formulated an environmental review process (CEQR) pursuant to the State Environmental Quality Review Act (SEQRA) and its implementing regulations (Part 617 of 6 New York Codes, Rules and Regulations). The City's CEQR rules are found in Executive Order 91 of 1977 and subsequent rules and procedures adopted in 1991 (62 Rules of the City of New York, Chapter 5). CEQR's mandate is to strike a balance between social and economic goals and concerns about the environment. Agencies undertaking, funding, or approving actions interject environmental considerations into their discretionary decisions by taking a "hard look" at the environmental consequences of each of those actions so that all potential significant environmental impacts of each action are disclosed, alternatives that avoid or reduce such impacts are considered, and appropriate, practicable measures to reduce or eliminate such impacts are adopted.

The CEQR process begins with selection of a Lead Agency for the review. The Lead Agency is generally the governmental agency that is most responsible for the decisions to be made on a proposed action and is also capable of conducting the environmental review. As described above, the Office of the Deputy Mayor for Housing, Economic Development, and Workforce (DMHEDW) is the Lead Agency for the Proposed Project. The environmental review process will

inform the Lead Agency and involved agencies as they make decisions on the actions noted above, including ESD's affirmation of the final GPP.

The Lead Agency, after reviewing the Environmental Assessment Statement (EAS), has determined that the Proposed Project has the potential for significant adverse environmental impacts and that an EIS must be prepared. A public scoping of the content and technical analyses of the EIS is the first step in its preparation, as described below. Following completion of scoping, the Lead Agency oversees preparation of a DEIS for public review.

The Lead Agency will hold a public hearing for consideration of the application, including ESD's initially adopted GPP, following the completion of the DEIS. To accommodate a 30-day public comment period for proposed GPPs under the UDC Act, comments on both DEIS and ESD's initially adopted GPP will be accepted for a minimum of 30 days following the open public session, at which time the public review of the DEIS and GPP will end. The Lead Agency then oversees preparation of a Final EIS (FEIS), which incorporates all relevant comments made during public review of the DEIS. The FEIS is the document that forms the basis of CEQR Findings, which the Lead Agency and each involved agency must make before taking any action within its discretion on the Proposed Project. Separately, ESD's Directors, following their review of all comments received during the public hearing and subsequent public comment period, will be asked to affirm the GPP, together with any modifications that may be deemed appropriate.

This DSOW describes the analyses to be performed for the SEQRA and CEQR review. In addition, the federal actions will be subject to a standalone NEPA environmental review.

SCOPING

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Approvals. The process at the same time allows other agencies and the public a voice in framing the scope of the EIS. During the period for scoping, those interested in reviewing the Draft Scope of Work may do so and provide their comments in writing to the Lead Agency or at the public scoping meeting. The period for comments on the Draft Scope of Work will remain open for 10 days following the meeting, at which point the scope review process will be closed. The Lead Agency will then oversee the preparation of a Final Scope of Work, which incorporates all relevant comments made on the scope and revises the extent or methodologies of the studies, as appropriate, in response to comments made during scoping and to include any other necessary changes to the scope of the EIS. The DEIS will be prepared in accordance with the Final Scope of Work.

Public scoping meetings have been scheduled to provide a forum for public comments on this Draft Scope of Work. The Lead Agency will hold the scoping meetings at the following locations and times.

- An in-person scoping meeting will be held on **Tuesday, October 28, 2025, at 6:00 pm,** at the Joseph Miccio Cornerstone Community Center Gym at 110 West 9th Street, Brooklyn, NY 11231.
- A virtual scoping meeting will be held remotely on **Thursday, October 30, 2025, at 4:00pm,** via Zoom (register here: www.edc.nyc/bmt).

Written comments on the Draft Scope of Work will be accepted by the Lead Agency through the end of the day on **Monday, November 10, 2025.**

H. ENVIRONMENTAL IMPACT STATEMENT SCOPE OF WORK

The scope of the EIS will conform to all applicable laws and regulations and will follow the guidance of the *CEQR Technical Manual*.

The EIS will contain:

- A description of the Proposed Project and its environmental setting;
- A statement of the environmental impacts of the Proposed Project, including its short- and long-term effects;
- An identification of any adverse environmental effects that cannot be avoided if the Proposed Project is implemented;
- A discussion of alternatives to the Proposed Project;
- An identification of any irreversible and irretrievable commitments of resources that would be involved in the Proposed Project should it be implemented; and
- A description of mitigation measures proposed to minimize significant adverse environmental impacts.

The analyses for the Proposed Project will be performed for the first year in which the Proposed Project could be fully built and operational, which is 2038 (the "Build Year"). The incremental difference between the No Action and With Action conditions will form the basis for the EIS analyses. Based on the preliminary screening assessments outlined in the *CEQR Technical Manual* and as described in the EAS, the Proposed Project meets criteria warranting analysis of all environmental categories in the *CEQR Technical Manual*. Below are descriptions of the tasks to be undertaken for each of the environmental categories that will be analyzed in the EIS.

TASK 1: PROJECT DESCRIPTION AND ANALYSIS FRAMEWORK

The Project Description introduces the reader to the Proposed Project and provides the project data from which impacts are assessed. The chapter will contain a brief history of the Project Area; a description of the Proposed Project and its Purpose and Need; and a discussion of the approvals required. Tables and figures will present key project elements that reflect the RWCDS assumptions for the Proposed Project, such as a site/ground floor plan, elevations, and views of the project in its neighborhood context.

The chapter will also describe the role of the lead agency under CEQR and SEQRA as well as the environmental review process to aid in decision-making and its relationship to other approval procedures. This chapter is key to understanding the Proposed Project and provides the public and decision-makers a framework from which to evaluate the Proposed Project against the No Action condition.

TASK 2: LAND USE, ZONING, AND PUBLIC POLICY

This analysis will consider the effects of the Proposed Project in terms of land use compatibility and trends in local zoning and public policy. It will also provide a baseline for other analyses in the EIS. Specifically, the assessment will:

- Provide a brief development history of the Project Area and surrounding study area. The study area will include the Project Area and the area within approximately ¼-mile of the Project Area boundaries.

- Describe predominant land use patterns in the study area, including recent development trends for the ¼-mile study area (see **Figure 4**).
- Provide a zoning map and discuss existing zoning and any recent zoning actions in the study area.
- Describe conditions in the study area absent the Proposed Project (the No Action condition).
- Prepare a list of other projects expected to be built in the study area that would be completed before or concurrent with the Proposed Project, including plans for public improvements. Describe the effects of these projects on land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study area.
- Describe the Proposed Approvals, including ESD's initially adopted GPP and any related zoning overrides or land use or policy changes including the Industrial Business Zone (IBZ) designation and coordinating with the draft New York City Industrial Plan outlined in Local Law 172-2023 and released by the New York City Department of City Planning on September 16, 2025.
- Provide an assessment of the impacts of the Proposed Approvals and the Proposed Project on land use and land use trends, zoning, and public policy. Assess ESD's proposed GPP and related zoning overrides, and consider the effects related to issues of compatibility with surrounding land use, consistency with local zoning and other public policy initiatives, and the effects of the project on development trends and conditions in the area.
- Summarize public policies that may apply to the Project Area and study area and assess the Proposed Project's consistency with those policies, for instance the Blue Highways initiative. As the Project Area is within the coastal zone boundary, a Waterfront Revitalization Program (WRP) analysis will be provided.
- As noted above, the Blue Highways initiative is in its nascent and emerging stages; as specific Blue Highway nodes are identified and developed by NYCDOT and NYCEDC, environmental review will be undertaken and coordinated between any known and active projects to analyze the potential for cumulative impacts.

TASK 3: SOCIOECONOMIC CONDITIONS

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. 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. In some cases, these changes may be substantial but not adverse. In other cases, these changes may be good for some groups but bad for others. The objective of the CEQR analysis is to disclose whether any changes created by the project would have a significant impact compared to what would happen in the future without the project.[15]

The five CEQR issues of concern with respect to socioeconomic conditions are whether a Proposed Project could result in significant adverse impacts due to: (1) direct residential

[15] Additionally, the *BMT Vision Plan* commits to completing a Racial Equity Report on Housing and Opportunity prior to GPP approval. Any Racial Equity Report would be coordinated with the socioeconomic conditions analysis.

displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on a specific industry. The following describes the anticipated scope of work for each of these concerns.

DIRECT RESIDENTIAL DISPLACEMENT

The Project Area does not include any residential dwelling units. Therefore, the Proposed Project would not directly displace any residential uses, and an assessment of direct residential displacement is not warranted.

DIRECT BUSINESS DISPLACEMENT

Direct business displacement is the involuntary displacement of businesses from a site directly affected by a project. The Proposed Project would directly displace certain businesses currently operating within the Project Area, warranting CEQR assessment. Based on *CEQR Technical Manual* guidelines, the analysis will begin with a preliminary assessment that will:

- Identify any permanent or temporary relocation plans for existing uses within the Project Area in the future with the Proposed Project.
- Identify the number of employees and number and types of businesses in the Project Area that would likely be directly displaced by the Proposed Project, utilizing field surveys, online research, and information from property owners when available.
- Describe the operational characteristics of the businesses to be displaced, as well as their products, markets, and employment characteristics. This discussion would be based on available data from public sources such as the New York State Department of Labor (NYSDOL) and the U.S. Census Bureau, private companies such as Esri's ArcGIS Business Analyst and Dun & Bradstreet, and/or field investigation.
- Determine whether the businesses to be displaced provide essential products or services to the local economy that would no longer be available in its "trade area" to local residents or businesses due to the difficulty of either relocating the businesses or establishing new, comparable businesses.
- Determine whether a category of businesses to be displaced is the subject of regulations or publicly adopted plans to preserve, enhance, other otherwise protect it.
- Describe the type of relocation benefits that would be available to the displaced landlords, businesses, and employees.

If the preliminary assessment cannot rule out the potential for significant adverse impacts due to direct business displacement, then a more detailed analysis will be conducted. The detailed analysis, if determined to be warranted, would describe existing and anticipated future conditions to a level necessary to understand the operational characteristics of the displaced businesses, determine whether they can be relocated, and assess whether the potential loss of the businesses could result in changes that would be significant and adverse.

INDIRECT RESIDENTIAL DISPLACEMENT

The Proposed Project would introduce up to approximately 6,000 DUs in the Project Area. This surpasses the 200-unit-threshold warranting an indirect residential displacement assessment under CEQR. Pursuant to Section 310 of Chapter 5 of the *CEQR Technical Manual*, the socioeconomic study area boundary will include an approximately ½-mile study area surrounding the Project Area.

The concern with respect to indirect residential displacement is whether the Proposed Project could lead to increases in property values, and thus rents, making it difficult for some residents to afford their homes. The objective of the indirect residential displacement assessment is to determine whether the Proposed Project would either introduce or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. The assessment will use the most recent available U.S. Census data as well as current real estate market data to present demographic and residential market trends and conditions for the study area. The presentation of study area characteristics will include population, rent, and household income.

A preliminary assessment will carry out the following the step-by-step evaluation, pursuant to *CEQR Technical Manual* guidelines:

- Step 1: Determine if the Proposed Project would add substantial new population with different income as compared with the income of the study area population. If the expected average incomes of the new population would be similar to the average incomes of the study area populations, no further analysis is necessary. If the expected average incomes of the new population would exceed the average incomes of the study area populations, then Step 2 of the analysis will be conducted.
- Step 2: Determine if the Proposed Project's population is large enough to affect real estate market conditions in the study area. If the population increase may affect real estate market conditions, then Step 3 will be conducted.
- Step 3: Determine whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends and whether the study area potentially contains a population at risk of indirect displacement resulting from rent increases due to changes in the real estate market caused by the new population.

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

INDIRECT BUSINESS DISPLACEMENT

The Proposed Project would introduce a substantial amount of new uses as defined under CEQR (i.e., more than 200,000 square feet) warranting a preliminary assessment of potential indirect business displacement. The concern with respect to indirect business displacement is whether a project could lead to increases in property values, and thus rents, making it difficult for some businesses to afford their rent. The analysis will describe and characterize conditions and trends in employment and businesses within the study area using the most recent available data from U.S. Census Bureau, field survey, and online sources. This information will be used to consider the following as part of an assessment:

- Whether the Proposed Project would introduce enough of a new economic activity to alter existing economic patterns;
- Whether the Proposed Project would add to the concentration of a particular sector of the local economy enough to alter or accelerate existing economic patterns; and
- Whether the Proposed Project would directly or indirectly displace residents, workers, or visitors who form the customer base of existing businesses in the area.

ADVERSE EFFECTS ON A SPECIFIC INDUSTRY

Based on the guidelines in the *CEQR Technical Manual*, a preliminary assessment of effects on specific industries will be conducted to determine whether the Proposed Project could significantly affect business conditions in any industry or category of businesses within or outside the study area, or whether the Proposed Project could substantially reduce employment or impair viability in a specific industry or category of businesses.

TASK 4: COMMUNITY FACILITIES AND SERVICES

As defined for CEQR analysis, community facilities are public or publicly funded schools, libraries, childcare centers, health care facilities, and fire and police protection. The demand for community facilities and services is related to the type and size of the new population generated by the Proposed Project. The RWCDS associated with the Proposed Project would add approximately 6,000 new DUs to the Project Area. Under CEQR, this level of development warrants detailed analyses of elementary, intermediate, and high schools, libraries, and childcare centers. In addition, while the Proposed Project would not directly displace or alter police, fire, or health care facilities, it would introduce a sizeable new neighborhood, warranting assessment of the new demands placed on these service providers.

PUBLIC SCHOOLS

- The primary study area for the analysis of elementary and intermediate schools will be the school district's "sub-district" in which the Project Area is located. As the Project Area is located within Community School District (CSD) 15, Sub-district 3 (Carroll Gardens/Gowanus/Red Hook), the elementary and intermediate school analyses will be based on that sub-district. The Proposed Project's effects on high schools will be assessed on a borough-wide basis.
- Existing public elementary and intermediate schools serving CSD 15, Sub-district 3 will be identified and located. Existing capacity, enrollment, and utilization data for all public elementary and intermediate schools within Sub-district 3 will be provided for the current (or most recent) school year, noting any specific shortages of school capacity. Similar data will be provided for Brooklyn high schools. Utilization will be presented using the "Target Calculation Method," which is used by the New York City Department of Education (DOE) for capital planning purposes.
- Conditions that would exist in the No Action condition for Sub-district 3 (for elementary and intermediate school analyses) and the borough (for the high school analysis) will be identified, taking into consideration projected changes in future enrollments, including those associated with other developments in the affected sub-districts, using the New York City School Construction Authority's (SCA) Projected New Housing Starts. Plans to alter school capacity either through administrative actions on the part of the DOE, or as a result of the construction of a new school (as discussed in the *BMT Vision Plan* for the BMT North District) prior to the 2038 analysis year will also be identified and incorporated into the analysis. Planned new capacity projects from the New York City Department of Education's (DOE) 2025–2029 Five Year Capital Plan will be included in the analysis. The capacity of transportable classrooms, mini-schools, and annexes will not be included in the future conditions analysis.
- Future conditions with the Proposed Approvals will be analyzed, adding students likely to be generated by the Proposed Project to the projections for the future No Action condition. Impacts will be assessed based on the difference between the future With Action projections

and the future No Action projections (at the sub-district level for elementary and intermediate schools and at the borough level for high schools) for enrollment, capacity, and utilization in 2038.

- Consistent with *CEQR Technical Manual* guidelines, the potential for significant adverse impacts to elementary or intermediate schools would be identified if: (1) a utilization rate of the elementary and/or intermediate schools in the sub-district study area that is equal to or greater than 100 percent in the With- Action condition; and (2) the 100 percent utilization is threshold is exceeded by 100 or more new students. A significant adverse impact to high schools may result if the Proposed Approvals would result in: (1) a utilization rate of high schools in the borough-wide study area that is equal to or greater than 100 percent in the With Action condition; and (2) there is an increase of five percentage points or more in the utilization rate between the No Action and With Action conditions. If impacts are identified, mitigation will be developed in consultation with the New York City School Construction Authority (SCA) and the DOE. The number of school seats needed to mitigate any identified impacts, as well as the timing of the impacts, would be provided.

LIBRARIES

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

MEANS-TESTED EARLY CHILDHOOD PROGRAMS

- Existing publicly funded means-tested early childhood programs within approximately 1.5 miles of the Project Area will be identified. Each facility will be described in terms of its location, number of slots (capacity), enrollment, and utilization in consultation with the latest DOE dataset for enrollment and capacity.
- For the No Action condition, information will be obtained for any changes planned for child care programs or facilities in the area, including the closing or expansion of existing facilities and the establishment of new facilities. Any expected increase in the population of children

under age six within the eligibility income limitations, using the No Action condition, will be discussed as potential additional demand, and the potential effect of any population increases on demand of childcare services in the study area will be assessed. The available capacity of resulting deficiency in slots and the utilization rate for the study area will be calculated for the No Action condition.

- The potential effects of the additional eligible children resulting from the RWCDS for the Proposed Approvals will be assessed by comparing the estimated net demand over capacity to a net demand over capacity in the No Action condition.
- The analysis will determine whether the Proposed Approvals would result in significant adverse impacts to means-tested early childhood programs. A significant adverse impact may result, warranting consideration of mitigation, if the Proposed Approvals would result in both of the following: (1) a collective utilization rate of the means-tested early childhood programs in the study area that is greater than 100 percent in the With Action condition; and (2) an increase of five percent or more in the collective utilization rate of the means-tested early childhood programs in the study area between the No Action and With Action conditions.

HEATH CARE FACILITIES

- The assessment will identify and present on a map the locations of hospitals and public health clinics that could be affected by the Proposed Project, and document any physical changes planned for hospitals or public health clinics expected in the future No Action condition. The Health and Hospitals Corporation (for hospitals) or the Department of Health and Mental Hygiene (for public health clinics) will be contacted for information that may be useful in assessing the No Action condition.
- The Health and Hospitals Corporation and the Department of Health and Mental Hygiene (as appropriate) will be consulted to develop the appropriate assessment for determining the effects of a Proposed Project. The appropriate agency's assessment, which is expected to be provided in a letter or other official documentation, will then be used by the lead agency in making its own assessment of the Proposed Project's effects.

FIRE PROTECTION

- The assessment will identify, describe, and present on a map the locations of fire stations serving the Project Area, and will document any physical changes planned for station houses or equipment additions to the service area for the future No Action condition. The New York City Fire Department (FDNY) will be contacted for information that may be useful in assessing existing and No Action conditions. In addition, the assessment will summarize new projects and population that will be added to the service area in the No Action condition.
- The FDNY will be consulted to develop the appropriate assessment for determining the effects of the Proposed Project. The FDNY's assessment, which is expected to be provided in a letter or other official documentation, will then be used by the lead agency in making its own assessment of the Proposed Project's effects.

POLICE PROTECTION

- The assessment will identify, describe, and present on a map the locations and service areas of precinct houses serving the Project Area, and will document any physical changes planned for station houses expected in the future No Action condition. The New York Police Department (NYPD) will be contacted for information that may be useful in assessing existing

and No Action conditions. In addition, the assessment will summarize new projects and population that will be added to the service areas in the No Action condition.

- The NYPD will be consulted to develop the appropriate assessment for determining the effects of the Proposed Project. The NYPD's assessment, which is expected to be provided in a letter or other official documentation, will then be used by the lead agency in making its own assessment of the Proposed Project's effects.

TASK 5: 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 Proposed Project would not directly displace any publicly accessible open spaces, but the Proposed Project's buildings could cast new shadows on open space resources. Therefore, for direct effects, the EIS will identify and describe (in coordination with the shadows analysis described below) any study area open spaces that could be directly affected by the Proposed Project. The direct effects assessment will also describe the publicly accessible open spaces that would be introduced by the Proposed Project.

For the indirect effects analysis, the new population generated by the Proposed Project would exceed the 200 resident and 500 non-resident (e.g., employees, visitors, etc.) CEQR thresholds requiring an open space analysis. The indirect effects analysis will be consistent with the methodology set forth in the *CEQR Technical Manual* and will consist of the following:

- Establish the study areas for the analysis and calculate the total population in the study areas. Study areas will include the areas within a ¼-mile radius of the Project Area (the non-residential study area), and within a ½-mile radius of the Project Area (the residential study area).
- Create an inventory of publicly accessible open spaces within the study areas. This inventory will include examining these spaces for their facilities (active vs. passive use), condition (satisfactory or unsatisfactory), and utilization (crowded or not).
- Study area conditions in the future without the Proposed Project, including accounting for new non-residential and residential populations that would be introduced by background development projects and rezonings, and accounting for any new open space resources that could come online, as identified as part of the compilation of No Build projects under "Land Use, Zoning and Public Policy."
- Assess impacts of the Proposed Project based on quantified ratios and qualitative factors. The assessment will account for open spaces expected to be created with the Proposed Project.
- Identify potential mitigation measures for any identified potential significant adverse impacts on open space resources.

TASK 6: SHADOWS

The *CEQR Technical Manual* requires an analysis of potential shadow impacts for Proposed Approvals that would result in new structures or additions greater than 50 feet in incremental height, or of any height if the project site is adjacent to, or across the street from, a sunlight-sensitive resource. Sunlight-sensitive resources include publicly accessible parks, playgrounds, plazas, and other open spaces, sunlight-sensitive features of historic resources, and natural resources that are sensitive to sunlight.

The RWCDS for the shadows assessment assumes the outer envelope of development that could occur under the GPP and includes new buildings that would exceed the 50-foot incremental height threshold warranting CEQR assessment. The Project Area is adjacent to, or across the street from, several sunlight-sensitive resources, including Brooklyn Bridge Park, Adam Yauch Park, Van Voorhees Playground, Mother Cabrini Park, and the Buttermilk Channel, and therefore a shadows analysis will be conducted to determine whether and to what extent and duration new project-generated shadows would fall on these and other sunlight-sensitive resources in the longest-shadow study area.

The analysis will follow the tiered assessment methodology described in the *CEQR Technical Manual* and will include the following tasks:

- Develop a map and database of publicly accessible open spaces, historic resources with sunlight-dependent features, and natural resources located in the study area.
- Develop a three-dimensional computer model including a worst-case representation of the Proposed Project's development envelope, topography, streets, existing buildings, and the sunlight-sensitive resources developed in the preceding step.
- Using modeling software, determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the Proposed Project on four representative days of the year, accounting for intervening and surrounding buildings.
- Document the analysis with graphics comparing shadows resulting from the No Action Condition versus shadows resulting from the With Action Condition, to include incremental shadow highlighted in a contrasting color. Include a summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource.
- Assess the significance of any shadow impacts on sunlight-sensitive resources.

TASK 7: HISTORIC AND CULTURAL RESOURCES

The *CEQR Technical Manual* identifies historic and cultural resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. This includes designated NYC Landmarks (NYCLs); properties calendared for consideration as landmarks by the New York City Landmarks Preservation Commission (LPC); properties listed on the State/National Register of Historic Places (S/NR) or contained within a historic district listed on or formally determined eligible for S/NR listing (S/NR-eligible); properties recommended by the New York State Board for listing on the S/NR; National Historic Landmarks; and properties not identified by one of the programs listed above, but that meet their eligibility requirements.

There are three known historical architectural resources located within the Project Area—the S/NR-eligible former New York Dock building at 100 Imlay Street, the S/NR-listed Mary A Whalen that is moored at Pier 11, and the S/NR-eligible Hugh L. Carey Tunnel that runs below the Project Area. In addition, there are a number of known historic architectural resources in close proximity to the Project Area, including the S/NR-eligible former Wittemann Brothers Bottlers Supplies & Machinery Company at 43 Ferris Street, the S/NR-eligible row houses at 151-155 Sullivan Street, and the S/NR-eligible former cotton warehouse at 106 Ferris Street. The Governors Island NYCL and S/NR historic district is directly across Buttermilk Channel from the Project Area. Because the Proposed Project would result in above-ground construction resulting in ground disturbance, a historic and cultural resources analysis will be prepared.

Consultation with LPC will be undertaken as part of the historic and cultural resources analysis. Consultation with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) will also be required, because the Proposed Project is expected to require State permit approvals; this task will include an initial submission of the project to OPRHP via the agency's online Cultural Resources Information System (CRIS).

ARCHAEOLOGICAL RESOURCES

Portions of the project Site are included within buffer areas mapped around previously identified archaeological sites in CRIS. As the first step in the archaeological resources analysis, LPC and OPRHP will be consulted to request their preliminary determination of the potential archaeological sensitivity of the project Site. If LPC and/or OPRHP determine that the project Site is not potentially archaeologically sensitive, no further analysis of archaeological resources will be undertaken. If LPC and/or OPRHP determine that all or part of the project Site is potentially archaeologically sensitive and that additional archaeological analysis is warranted, a Phase 1A Archaeological Documentary Study ("Phase 1A Study") will be prepared. The Phase 1A Study will outline the precontact and historic contexts, environmental setting, development history, and past disturbance of the project Site to identify any potential resource types that may be present. The Phase 1A Study will also make a determination as to whether or not additional archaeological analysis (e.g., a Phase 1B Archaeological Investigation) is warranted. The conclusions of the Phase 1A Study will be summarized in the DEIS, and potential impacts on archaeological resources will be assessed in the No Action and With Action conditions.

ARCHITECTURAL RESOURCES

Impacts on architectural resources will be considered within the project Site and in a 400-foot radius area surrounding the Project Area. Longer contextual views available beyond the 400-foot study area from Governors Island will also be considered in coordination with the Urban Design and Visual Resources task. The architectural resources analysis will include the following tasks:

- Map and briefly describe known and potential historic architectural resources within the Project Area and in the surrounding 400-foot study area. To determine whether there are any potential architectural resources that could be affected by the Proposed Project, an architectural historian will conduct a field survey of the study area. Potential architectural resources comprise properties that appear to meet the eligibility criteria for NYCL designation and/or S/NR listing. The field survey will be supplemented, as necessary, with research at relevant repositories, online sources, and current sources prepared by LPC and OPRHP.
- Describe any potential direct or indirect effects to historic and cultural resources in the future without the Proposed Approvals.
- Assess the potential effects of the RWCDS on historic and cultural resources, including visual and contextual changes as well as any direct physical effects.
- If necessary, develop measures to avoid, minimize, or mitigate any adverse impacts on historic and cultural resources in consultation with LPC and OPRHP.

TASK 8: URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the *CEQR Technical Manual*, if a project requires actions that would result in physical changes to a project Site beyond those allowable by existing zoning and which could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared. A detailed analysis is then prepared if warranted based on the preliminary assessment. Given the scale of the Proposed Project, which would result

in the development of a number of large buildings on the Brooklyn waterfront, a detailed assessment of urban design and visual resources is warranted and will be prepared. This analysis will follow the methodologies of the *CEQR Technical Manual*.

The ¼-mile study area for the assessment of urban design and visual resources would be the same as that used for the land use analysis, and it would also consider longer views towards the Project Area, such as from any publicly accessible locations on the east side of Governors Island and from the Lower Manhattan waterfront. The detailed analysis will draw on information from field visits to the study area and visual materials prepared for the RWCDS and will present, as warranted, illustrative sketches or renderings of the future No Action and With Action conditions for existing views; context and conceptual site plans; floor area calculations; street wall and building heights; building setbacks; and birds-eye views of conceptual development under the RWCDS. The analysis will analyze ESD's proposed override of local zoning under the GPP as it relates to urban design and visual resources in the Project Area. The analysis will describe the potential changes that could occur to urban design and visual resources in the With Action condition, in comparison to the No Action condition, focusing on the changes that could negatively affect a pedestrian's experience of the area. The analysis will also describe measures intended to improve the pedestrian experience. If necessary, mitigation measures to avoid or reduce potential significant adverse effects will be identified.

TASK 9: NATURAL RESOURCES

An assessment of natural resources is conducted when a natural resource is present on or near a development Site and the project may involve the direct or indirect disturbance of that resource. The *CEQR Technical Manual* defines natural resources as water resources, including surface water bodies and groundwater; wetlands, including freshwater and tidal wetlands; terrestrial resources, such as grasslands and thickets; shoreline resources, such as beaches, dunes, and bluffs; gardens and other ornamental landscaping; and natural resources that may be associated with built resources, such as old piers and other waterfront structures. The Proposed Project is expected to include the rehabilitation or reconstruction of several of the existing piers in the Project Area. Due to the potential type and amount of in-water work associated with the Proposed Project, a detailed natural resources assessment is required.

The natural resources assessment will describe the existing terrestrial and aquatic natural resources, including threatened or endangered species, at a level of detail commensurate with the potential for the Proposed Project to adversely affect these resources. Existing terrestrial and aquatic natural resources in the Project Area will be characterized based on site reconnaissance, review of existing information, and consultation with responsible agencies, including NYSDEC, USFWS, and NOAA Fisheries. The evaluation of the potential for the Proposed Project to adversely affect these resources will consider short-term construction-related impacts and long-term impacts from any permanent impacts resulting from the Proposed Project. Potential construction-related impacts on ecological communities and wildlife include those due to removal of any limited existing vegetation and increases in human activity or construction noise, and construction-related impacts on aquatic resources include those from temporary sediment resuspension, shading from construction vessels, and increases in underwater noise. Potential long-term impacts include changes to the type and amount of vegetation or landscaping at the Project Area, changes in overwater coverage and shading of aquatic habitat, the placement or removal of fill or structure resulting in benthic habitat loss or conversion, and changes related to human activity or use of the shoreline or waterway resulting from the Proposed Project. The evaluation will include measures to avoid and minimize potential adverse effects from the

Proposed Project, and if warranted, will identify whether compensatory mitigation is required for any unavoidable adverse effects.

TASK 10: HAZARDOUS MATERIALS

This chapter will address the potential presence of hazardous materials, petroleum products, and/or other environmental concerns in the Project Area, as well as necessary measures that would be required, either prior to or during construction and/or operation of the Proposed Project, to avoid significant adverse effects.

A Phase I Environmental Site Assessment (ESA) will be prepared and will be used to summarize the potential for hazardous materials within the Project Area. The scope for the Phase I ESA will be consistent with current industry and regulatory standards, including ASTM E1527-21, and will be informed by review of a previous Phase I ESA prepared for the BMT campus.

It is anticipated that the lead agency and the New York City Department of Environmental Protection (NYCDEP) will require preparation of a Phase II Subsurface Investigation—including geophysical survey and laboratory analysis of soil, groundwater, and soil vapor samples—during the CEQR process. In advance of conducting the testing, a Work Plan for the investigation will need to be submitted to the agencies for approval. Finally, the chapter will identify the binding mechanisms to ensure that testing and other measures are performed, including, where necessary, the implementation of site-specific Remedial Action Plans and Construction Health and Safety Plans (RAPs and CHASPs, respectively).

TASK 11: WATER AND SEWER INFRASTRUCTURE

The *CEQR Technical Manual* requires a sewer infrastructure analysis for projects in Brooklyn served by the combined sewer system that exceed 400 DUs or 150,000 square feet of non-residential (commercial, public facility and institution, and/or community facility) space and/or would result in changes to surface area coverage on large sites. The *CEQR Technical Manual* also requires analysis of projects located in an area that is partially sewered or currently unsewered. As the Proposed Project includes development of properties that are not connected to the City's sewer system, and is expected to exceed both the residential and non-residential development threshold, an analysis of the wastewater and stormwater conveyance and treatment system serving the Project Area is required.

According to the *CEQR Technical Manual*, a water supply analysis is required for projects located in areas that experience low water pressure or projects that would result in an exceptionally large demand for water (over one million gallons per day [gpd]). As the water demand of the Proposed Project is expected to exceed one million gpd, an assessment of the water supply infrastructure serving the Project Area will be prepared and included in the infrastructure analysis.

The water and sewer infrastructure analysis will include a description of the existing water supply and sewer infrastructure serving the Project Area, based on records obtained from DEP, such as sewer network maps and drainage plans. Existing stormwater drainage system and surfaces (pervious or impervious) will be described. It will provide a description of any changes to the Project Area's stormwater drainage systems, the Project Area's surface area, and the area's water supply and sewer system that can be expected in the No Action condition.

An analysis of potential impacts will be provided, incorporating any infrastructure improvements planned as part of the Proposed Project. As notes in the *BMT Vision Plan*, DEP is leading an Amended Drainage Plan (ADP) for the Project Area and its surroundings, which will be coordinated with this DEIS analysis.

The sewer infrastructure analysis will focus on how sanitary sewage and stormwater flows are managed at the Project Area. Sanitary sewage generation for the Proposed Project will be estimated, and the effects of the incremental demand on the system will be assessed to determine the impact on operations of the wastewater resource recovery facility (WRRF) serving the Project Area. Based on the analyses of future stormwater and wastewater generation, the change in flows and volumes to the sewer system and waterbodies due to the Proposed Project will be determined. The analysis will also take into account the DEP Unified Stormwater Rule (USWR) in relation to new development with the Proposed Project. Any wastewater and stormwater best management practices to be included as part of the Proposed Project will be described.

TASK 12: SOLID WASTE AND SANITATION SERVICES

A solid waste assessment determines whether an action has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan or with state policy related to the City's integrated solid waste management system. The Proposed Project would induce new development that would require sanitation services. If a project's generation of solid waste in the With Action condition would not exceed 50 tons per week, it may be assumed that there would be sufficient public or private carting and transfer station capacity in the metropolitan area to absorb the increment, and further analysis generally would not be required. As the Proposed Project is expected to result in a net increase of more than 50 tons per week, compared with the No Action condition, an assessment of solid waste and sanitation services is warranted. This chapter will provide an estimate of the additional solid waste expected to be generated by the proposed developments assess its effects on the City's solid waste and sanitation services. This assessment will:

- Describe existing and future New York City solid waste disposal practices. Estimate solid waste generation by the Proposed Project for existing, No Action, and With Action conditions.
- Assess the impacts of the Proposed Project's solid waste generation (from the development Site) on the City's collection needs and disposal capacity.

The Proposed Project's consistency with the City's Solid Waste Management Plan will also be assessed. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

TASK 13: ENERGY

A project's energy consumption and the existing conditions of the energy grid are considered to determine whether an action has the potential to affect the generation and transmission of energy. According to the *CEQR Technical Manual*, because all new structures requiring heating and cooling are subject to the New York State Energy Conservation Code, which reflects State and City energy policy, actions resulting in new construction would not create significant energy impacts, and as such would not require a detailed energy assessment. Furthermore, the requirements under Local Law 154 of 2021 effectively ban the installation of most new natural gas and other fossil fuel-fired systems in buildings within New York City, and Local Law 97 of 2019 requires most building demonstrate consistency with the City's carbon intensity limits. Therefore, it is assumed that the Proposed Project will utilize electric-powered equipment would be utilized for its heating and hot water needs.

While the Proposed Project does not require a detailed energy assessment, the EIS will disclose the projected annual energy consumption during long-term operation for the buildings included in the Proposed Project. The Proposed Project's annual energy consumption will be compared to

energy demand and generation capacity for New York City to discuss the potential effects of the Proposed Project on the available energy supply.

TASK 14: 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 at least 50 peak hour vehicle trips, 50 or more bus trips in a single direction on a single route, 50 Citywide Ferry Service trips, and/or 200 subway/rail/pedestrian trips. An assessment and any required analysis will be provided in the Transportation chapter of the EIS and will be subject to review and approval by the lead agency and, potentially, involved expert agencies, such as NYCDOT or MTA.

As described in the *BMT Vision Plan*, the City has committed to studying at least two street-circulation options in close collaboration with the NYCDOT and other involved agencies, with a goal of reducing traffic and freight effects of the proposed development as well as improving circulation in the surrounding area, including with regard to access points, crossings, traffic management, and local streets, including but not limited to Columbia Street, related to the Brooklyn Queens Expressway (BQE).

Following the *BMT Vision Plan* release, NYCEDC and Task Force leadership prioritized the following geographies for the Lead Agency's consideration and inclusion in the Traffic Study Area:

- Entrances and exits to the BMT Site
- Key intersections along Columbia, Atlantic, Van Brunt, Hamilton and the existing BQE ramps
- Major east/west or north/south corridors
- Neighborhood streets accommodating traffic bypassing the BQE, including Hicks and Clinton

The areas identified above will be subjected to a screening assessment using the methodology discussed below and may not necessitate further study if not exceeding certain thresholds of volume or traffic. The specific transportation analysis tasks to be undertaken as part of this environmental review are outlined below.

TRAVEL DEMAND PROJECTIONS AND SCREENING ASSESSMENTS

The transportation analyses for the EIS will be included in the Transportation chapter of the EIS and will assess potential impacts associated with trip increments that could occur as a result of the Proposed Project. Travel demand projections will be prepared for the Proposed Project using standard sources, such as the *CEQR Technical Manual*, U.S. census data, approved studies, and other references. The estimates will be used to prepare the Level 1 (trip generation) and Level 2 (trip assignment) screening assessments prescribed in the *CEQR Technical Manual*. As part of this effort, an inventory of the area's existing parking supply and utilization (within ¼-mile from the Proposed Project) will be undertaken to determine likely locations where project-generated auto trips would be accommodated. The projected trips (by auto/taxi, subway, bus, ferry, or walk/bike, and deliveries, etc.) will be assigned to the area's transportation network to identify specific transportation elements that would be subject to further detailed analyses. Site access for pedestrians and vehicles will be described, and a site plan illustrating access points will be provided in the DEIS. The findings of these assessments, along with relevant documentation and graphics, will then be summarized in the Transportation chapter of the EIS for review and concurrence by the lead agency and, potentially, involved expert agencies, such as NYCDOT or MTA.

TRAFFIC

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

TRANSIT

As stated by the *CEQR Technical Manual*, further transit analyses may be warranted if a proposed action is anticipated to result in an incremental increase of 200 or more peak hour subway/rail trips or 50 or more bus trips in a single direction on a single route, or 50 or more Citywide Ferry Service trips. Further transit analyses will be conducted in the Transportation chapter of the EIS to identify the potential for any transit elements, i.e., subway station elements, subway lines, or bus/Citywide Ferry Service routes, to have significant adverse impacts resulting from the Proposed Project. The EIS will additionally review bus routes that had historically served the Columbia Street waterfront district (such as the B71) and analyze the benefits and drawbacks of a potentially restored B71 service to accommodate the Proposed Project. As discussed in the *BMT Vision Plan*, upon approval of the GPP, NYCEDC intends to increase NYC Ferry service frequency to approximately 30-minute headways during peak periods, explore ways to reconfigure ferry service that provides a one-seat ride to Midtown Manhattan, and consider consistent services hours throughout the system. The EIS will consider these *BMT Vision Plan* commitments of the Proposed Project in the analysis. If significant impacts are identified in the Transportation chapter, the Mitigation chapter of the EIS will identify transportation improvement measures to mitigate the significant impacts, if available.

PEDESTRIANS

Consistent with the *CEQR Technical Manual*, further pedestrian analyses may be warranted if a proposed action is anticipated to result in an incremental increase of 200 or more peak hour pedestrian trips. Further pedestrian analyses will be conducted in the Transportation chapter of the EIS to identify the potential for any pedestrian elements, i.e., sidewalks, corner reservoir areas, or crosswalks, to have significant adverse impacts resulting from the Proposed Project. If significant impacts are identified in the Transportation chapter, the Mitigation chapter of the EIS will identify transportation improvement measures to mitigate the significant impacts, if available.

STREET USER SAFETY ASSESSMENT

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

PARKING

Based on the *CEQR Technical Manual*, a parking study is warranted if detailed traffic analyses are conducted. The parking study will assess the parking demand of the Proposed Project, compare it to on-site and off-site parking resources within ¼-mile of the Proposed Project, and identify and quantify any expected parking shortfalls. The area of the Proposed Project north of Atlantic Basin/Hamilton Avenue is located in Downtown Brooklyn in an area called Parking Zone 2 and the remainder is in Parking Zone 3 according to the *CEQR Technical Manual.* In Parking Zone 2, the inability of the on-site and off-site parking resources in the surrounding area to accommodate the Proposed Project's future parking demands is considered a parking shortfall but is generally not considered a significant adverse parking impact due to the magnitude of available alternative modes of transportation. In Parking Zone 3, the Proposed Project may identify a significant parking impact if the on-site and off-site parking resources in the surrounding area would not accommodate the Proposed Project's future parking demands.

TASK 15: AIR QUALITY

An analysis will be prepared to consider the Proposed Project's air quality impacts from pollutant emissions—either direct or indirect sources. Direct impacts result from emissions generated by stationary sources at a project 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 project or other changes to future traffic conditions due to a project.

On December 15, 2021, the New York City Council passed a bill, Local Law 154, that will effectively ban the installation of most new natural gas and other fossil fuel-fired systems in buildings in New York City.[16] In addition, proposed building designs must meet the applicable provisions of the NYC Energy Conservation Code and demonstrate consistency with the City's carbon intensity limits established pursuant to Local Law 97 of 2019. Therefore, it is assumed that electric systems would be utilized for the Proposed Project's heating and hot water needs across the entire Project Area, and thus no analysis of stationary source heating and hot water emissions from the Proposed Project will be required.

The number of project-generated vehicle trips will likely exceed the *CEQR Technical Manual* carbon monoxide (CO) analysis screening threshold of 170 vehicles in the peak hour at a number of locations in the study area. In addition, the projected number of vehicles will likely exceed the applicable fine particulate matter ($PM_{2.5}$) screening threshold in the *CEQR Technical Manual*. Therefore, a microscale analysis of CO and/or PM mobile source emissions at affected intersections will likely be necessary. Using computerized dispersion modeling techniques, the effects of project-generated traffic on CO and $PM_{2.5}$ concentrations at critical intersection locations will be determined. In addition, the effect of the Proposed Project's parking facility on air quality will be analyzed, and the results from that analysis will be combined with the intersection analyses, where applicable.

In addition, the potential air quality impacts associated with marine vessels traveling to and from the Project Area will be evaluated as part of the EIS. This is expected to include marine vessels associated with freight operations, cruise ships and ferries. Reasonable worst-case pollutant

[16] The ban is being enforced by the New York City Department of Buildings (DOB) on the submission of construction documents for new buildings as of January 2024 and is being phased in for new buildings based on the number of stories and use type.

emissions will be estimated using information on vessels similar to those that would be used at the BMT in the future with the Proposed Project and the anticipated vessel schedules.

Since the Project Area is located adjacent to manufacturing zoned areas, an evaluation of emissions from industrial sources will be performed, as per the *CEQR Technical Manual* guidance. Large and major sources of emissions within 1,000 feet of the study area will also be examined, as described in the *CEQR Technical Manual*.

As part of the Air Quality task, a methodology memo will be prepared that outlines the procedures and assumptions to be used in carrying out the air quality analyses. The methodology memo will be submitted to the lead agency for review and comment. The tasks described below will be undertaken after addressing agency comments and receiving sign-off on the memo:

MOBILE SOURCE—INTERSECTION ANALYSIS

- Existing ambient air quality data for the study area will be summarized. Specifically, ambient air quality monitoring data published by the New York State Department of Environmental Conservation (NYSDEC) will be compiled for the analysis of existing and future conditions.
- Critical intersection locations in the study area will be selected, representing locations with the highest potential total and incremental pollution impacts, based on data obtained from the Proposed Project's traffic analysis. At each intersection, multiple receptor locations will be analyzed in accordance with CEQR guidelines.
- The refined U.S. Environmental Protection Agency (EPA) AERMOD model will be used to predict the maximum change in CO and $PM_{2.5}$ concentrations, consistent with current EPA modeling guidance.
- Vehicular cruise and idle emissions for the dispersion modeling will be computed using EPA's MOVES5 model. Re-suspended road dust emission factors will be calculated based on CEQR guidance and the EPA procedure defined in AP–42.
- At each microscale receptor site, calculate for each applicable peak period the maximum 1- and 8-hour average CO concentrations and maximum 24-hour and annual average $PM_{2.5}$ concentrations for No Action and With Action Conditions.
- An assessment of the potential CO and PM impacts associated with proposed parking facilities will be performed. The analysis will apply the procedures outlined in the *CEQR Technical Manual* for assessing potential impacts from proposed parking facilities. Cumulative impacts from on-street sources and emissions from parking will be calculated, where appropriate.
- Future pollutant levels with the Proposed Project will be compared with the CO NAAQS and the City's CO and $PM_{2.5}$ *de minimis* criteria, as appropriate, to determine the potential impacts of the Proposed Approvals.
- For locations where significant adverse air quality and/or traffic impacts are predicted, perform additional analysis using refined assumptions and/or model methodologies, or identify appropriate mitigation measures.

MOBILE SOURCE—MARINE VESSEL ANALYSIS

- Marine vessel cruise, maneuver, and idle emissions for NO_2 and $PM_{2.5}$ will be prepared for the dispersion modeling using information on vessels similar to vessels that are anticipated to be used with the Proposed Project and their anticipated operation schedules.
- Dispersion modeling will be performed using the EPA AERMOD model and five years of recent meteorological data—consistent with the intersection analysis.

- Pollutant concentrations from the marine vessel activity that would result from the proposed project will be analyzed at nearby sensitive receptors.
- Modeled $PM_{2.5}$ concentrations from the marine vessels will be compared directly to the City's *de minimis* criteria incremental thresholds. However, modeled NO_2 concentrations will be added to representative background concentrations and the summation will be directly compared with the National Ambient Air Quality Standards (NAAQS) to determine compliance with standards.

STATIONARY SOURCE ANALYSIS—PROJECT INDUSTRIAL SOURCES

- The Proposed Approvals would result in some developments containing a mix of residential, non-residential, and light industrial development. Therefore, the potential for impacts from pollutant emissions from light manufacturing uses on nearby sensitive receptors will be evaluated.
- An analysis of potential identified industrial sources of air emissions will be performed using the AERMOD model to project concentrations of air contaminants and will be compared to NYSDEC DAR-1 guideline values for short-term (SGC) and annual (AGC) averaging periods. In the event that violations of standards are predicted, measures to reduce pollutant levels to within standards will be examined.

STATIONARY SOURCE ANALYSIS—EXISTING SOURCES

- An assessment of emissions from industrial sources will be performed, as per the *CEQR Technical Manual*. A field survey will be performed to identify processing or manufacturing facilities within 400 feet of the Project Site. A copy of the air permits for each of these facilities will be requested from the NYCDEP Bureau of Environmental Compliance. A review of NYSDEC permits and registrations will also be performed to identify any federal or state-regulated facilities within the study area. If any sources are identified, an analysis would be performed as outlined in the *CEQR Technical Manual*.
- An analysis of existing large and major sources of emissions (such as sources having federal and state permits) identified within 1,000 feet of the proposed Rezoning Area will be performed to assess their potential effects on the proposed project. Predicted criteria pollutant concentrations will be predicted using the AERMOD model compared with NAAQS for NO_2, SO_2 (if fuel oil No. 2 is used), and PM_{10}, and *de minimis* criteria for $PM_{2.5}$.

TASK 16: GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

According to the *CEQR Technical Manual*, a greenhouse gas (GHG) emissions assessment is typically conducted for larger projects (350,000 sf or greater) subject to an EIS. Relevant GHG emissions standards include those set forth in Local Law 97 of 2019, which sets emission caps for buildings larger than 25,000 sf beginning in 2024, and the Climate Leadership and Community Protection Act (CLCPA), which requires New York to reduce economy-wide greenhouse gas emissions 40 percent by 2030 and no less than 85 percent by 2050 from 1990 levels. A detailed analysis of greenhouse gas emissions from the Proposed Project will be conducted to confirm that the Proposed Project would be consistent with guidelines provided in the *CEQR Technical Manual*, Local Law 97, and the CLCPA, as well as with New York City's GHG reduction goals established under *PlaNYC* and *OneNYC 2050*, which states a goal of eliminating 100 percent of greenhouse gas emissions by 2050. Features of the Proposed Project that demonstrate consistency with the GHG reduction goals will be described. Relevant measures to reduce energy consumption and GHG emissions that could be incorporated into the Proposed Project will be discussed, and

the potential for those measures to reduce GHG emissions will be assessed to the extent practicable, and measures that would be considered as part of the Proposed Project to make it more resilient to the potential effects climate change will be disclosed.

GHG emissions generated by the Proposed Project will be quantified during both the construction and operational phases. Operational phase emissions will be estimated for the analysis year and reported as carbon dioxide equivalent (CO_2e) metric tons per year. GHG emissions other than carbon dioxide (CO_2) will be included if they would account for a substantial portion of overall emissions, adjusted to account for the global warming potential. In addition, estimates of upstream emissions (associated with the extraction and transport of fuel and materials to the Site) will be included, where appropriate.

As the Proposed Project is located in a flood hazard zone, the potential effects of climate change on the Proposed Project will be evaluated. The discussion will focus on sea level rise, changes in storm frequency and intensity projected to result from global climate change, increased precipitation, and change in heat impacts and the potential future impact of those changes on the Proposed Project's infrastructure and uses.

GREENHOUSE GAS EMISSIONS EVALUATION

- It is assumed that the Proposed Project's heating and hot water systems would utilize primarily grid electricity. If any project component utilizes fossil fuels (such as natural gas used for cooking), the GHG emissions will be quantified, as appropriate. Emissions will be based on available project specific information regarding the Proposed Project's expected fuel use or carbon intensity factors specified in the *CEQR Technical Manual*.
- GHG emissions from purchased electricity generated off-site and consumed on-site during the Proposed Project's operation (including the assumed electric heating and hot water systems) will be estimated.
- GHG emissions from vehicle trips to and from the Project Site will be quantified using trip distances and vehicle emission factors provided in the *CEQR Technical Manual*.
- Due to the anticipated construction activities and duration, a quantified analysis of GHG emissions during the construction phase will also be provided. GHG emissions from on-site fuel usage and the extraction/production of materials or fuels needed to construct the Proposed Project will be included as part of the Proposed Project's total emissions. Features of the Proposed Project that demonstrate consistency with the City's GHG reduction goal will also be described.
- Design features and operational measures to reduce the Proposed Project's energy use and GHG emissions will be discussed and quantified to the extent that information is available. This may include design features to meet the NYC Energy Conservation Code or equipment electrification.
- The quantified emissions will be used to demonstrate the Proposed Project's ability to meet the immediate carbon intensity limits for buildings established under Local Law 97 of 2019 for the analysis year using emission factors for the existing electrical grid.
- Consistency with the City and State's GHG reduction goal will be assessed. While the City's overall goal is to reduce GHG emissions by 30 percent below 2005 levels by 2025 and net zero emissions by 2050, consistency for individual projects is evaluated based on building energy efficiency, proximity to transit, on-site renewable power and distributed generation, efforts to reduce on-road vehicle trips and/or to reduce the carbon fuel intensity or improve vehicle efficiency for project-generated vehicle trips, and other efforts to reduce the Proposed

Project's carbon footprint. Similarly, New York State's CLCPA has established additional GHG reduction goals that will be considered. The analysis will evaluate whether the Proposed Project would be inconsistent with or interfere with the attainment of the statewide greenhouse gas emissions limits established by the CLPCA.

CLIMATE CHANGE RESILIENCY ASSESSMENT

The potential effects of climate change on the Proposed Project will be evaluated based on the best available information. Since the Project Area is located within a flood hazard zone, the potential impacts of climate change on the Proposed Project will be evaluated. The discussion will focus on the current and potential impacts from sea level rise, changes in storm frequency projected to result from global climate change, the heat island effect and the interaction with project infrastructure and uses. The discussion will also focus on early integration of climate change considerations into the Proposed Project to allow for uncertainties regarding future environmental conditions resulting from climate change.

TASK 17: NOISE

The *CEQR Technical Manual* requires that the noise study address whether the Proposed Project would result in a significant increase in noise levels (particularly at sensitive land uses such as residences), evaluate noise exposure at newly introduced noise-sensitive uses (e.g., residential, school, public open space), and determine the necessary level of building attenuation to provide acceptable interior noise levels. It is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and that no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed. Consequently, the noise analysis will examine the potential noise level increases resulting from changes in vehicular traffic associated with the Proposed Project, as well as the level of building attenuation necessary to meet CEQR interior noise level requirements. The building attenuation study will be an assessment of noise levels in the surrounding area associated primarily with vehicular traffic. Specifically, the proposed work program will include the following tasks:

- Select appropriate noise descriptors. Appropriate noise descriptors to describe the existing noise environment will be selected. The L_{eq} and L_{10} levels will be the primary noise descriptors used for the noise analysis.
- Select receptor locations for building attenuation analysis purposes. The receptor locations will be located within or adjacent to the Project Area.
- Conduct noise level measurements during each of three (3) weekday peak periods and one Saturday peak period. L_{eq}, L_1, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} values will be recorded.
- Data analysis and reduction. The results of the noise measurement program will be analyzed and tabulated.
- Determine future noise levels without and with the Proposed Project. At each of the receptor locations identified above, determine noise levels without and with the Proposed Project using existing noise levels, acoustical fundamentals, traffic analysis results, and mathematical models.
- Qualitatively discuss potential noise effects of interior noise-generating uses included in the Proposed Project (e.g., maker and creative industrial uses) on surrounding community receptors as well as other noise-sensitive uses included in the Proposed Project, including a discussion of commitments to comply with restrictions in the New York City Noise Control Code.

- Compare noise levels with standards, guidelines, and other impact evaluation criteria. Compare existing noise levels and future noise levels, both with and without the Proposed Project, with various noise standards, guidelines, and other appropriate noise criteria.
- Determine amount of building attenuation required. The level of building attenuation necessary to satisfy CEQR requirements is a function of exterior noise levels and will be determined. Measured values will be compared to appropriate standards and guideline levels.
- Make recommendations regarding general noise attenuation measures needed for the Proposed Project to achieve compliance with standards and guideline levels.

TASK 18: PUBLIC HEALTH

Drawing on other EIS analyses (i.e., air quality, water quality, noise, hazardous materials, and construction), this chapter, if necessary, will assess and summarize the Proposed Project's potential for significant adverse impacts on 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 for that specific technical area.

TASK 19: NEIGHBORHOOD CHARACTER

This chapter will assess and summarize the Proposed Project's likely effects on neighborhood character using the analysis of impacts presented in other pertinent EIS analyses. Neighborhood character is established by a number of factors, such as land use, zoning, and public policy; socioeconomic conditions; community facilities; open space; historic and cultural resources, urban design and visual resources; shadows; transportation; and noise. 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.

Methodologies outlined in the *CEQR Technical Manual* will be used to provide an assessment of neighborhood character. Work items for this task are as follows:

- Based on other EIS sections, describe the predominant factors that contribute to defining the character of the neighborhood surrounding the Project Area.
- Based on planned development projects, public policy initiatives, and planned public improvements, summarize changes that can be expected in the character of the area in the future both with and without the Proposed Approvals.
- Assess and summarize the Proposed Approvals' effects on neighborhood character using the analysis of impacts as presented in other pertinent EIS sections (particularly socioeconomic conditions, community facilities; open space, historic and cultural resources, urban design and visual resources, shadows, traffic, and noise).

If required based on the preliminary assessment, a detailed assessment of the Proposed Project's effects on neighborhood character will be prepared following *CEQR Technical Manual* guidance.

TASK 20: CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. The construction impact

assessment will evaluate the duration and severity of the disruption and inconvenience to nearby areas. This assessment will describe the anticipated construction schedule and logistics, discuss on-site activities, and provide estimates of construction workers and truck deliveries for the construction work required for the Proposed Project.

Because the construction duration for the Proposed Project is anticipated to be long-term (i.e., greater than two years in accordance with the *CEQR Technical Manual*) and would occur in proximity to sensitive receptors, the Proposed project could have substantial and extended construction effects. Large-scale development near sensitive receptors locations with a long construction duration require a quantitative assessment of the potential impacts of construction activities on transportation, air quality, and noise. For each of the technical areas, appropriate construction analysis year(s) will be selected to represent reasonable worst-case conditions relevant to that technical area, which can occur at different times for different analyses.

TRANSPORTATION SYSTEMS

This assessment will consider losses in lanes, sidewalks, off-street parking, and effects on other transportation services (i.e., transit and pedestrian circulation) during the construction periods and other relevant peak hours, and identify the increase in vehicle trips from construction workers and trucks. Issues concerning construction worker parking, truck staging, and potential conflicts with trucks already circulating in the area will also be addressed. Based on the trip projections of activities associated with peak construction for the Proposed Project, an assessment of potential transportation impacts during construction will be provided. The steps identified in "Task 14: Transportation," will be followed to present this transportation screening assessment and detailed analyses. In addition to the steps in the screening assessment, a detailed analysis will be undertaken if the project's construction activities require closing, narrowing, or otherwise impeding moving lanes, roadways, key pedestrian facilities (e.g., sidewalks, crosswalks, corners/corner reservoirs), parking lanes and/or parking spaces in on-site or nearby parking lots and garages, bicycle routes and facilities, bus lanes or routes, or access points to the Citywide Ferry Service in such a manner that determines that detailed analyses are warranted. The findings of these assessments, along with relevant documentation and graphics, will then be summarized in the Construction chapter of the EIS. If detailed transportation analyses are conducted and significant impacts are identified in the Construction chapter, the Mitigation chapter of the EIS will identify construction period transportation improvement measures to mitigate the significant adverse impacts, consistent with the guidelines presented in the *CEQR Technical Manual.*

AIR QUALITY

A detailed dispersion analysis of construction sources will be performed to determine the potential for air quality impacts on sensitive receptor locations. Air pollutant sources would include combustion exhaust associated with non-road construction engines (e.g., cranes, excavators) and trucks operating on-site, construction-generated traffic on local roadways, as well as onsite activities (e.g., excavation, demolition) that generate dust. The pollutants of concern include carbon monoxide (CO), particulate matter (PM), and nitrogen dioxide (NO_2). The potential for significant impacts will be determined by a comparison of the model predicted concentrations to the National Ambient Air Quality Standards (NAAQS), or by comparison of the predicted increase in concentrations to applicable interim guidance thresholds. The air quality analysis will also include a discussion of the strategies to reduce project related air pollutant emissions associated with construction activities.

NOISE AND VIBRATION

This section will contain a quantitative (modeling) analysis of noise from the Proposed Project's construction activity. The analysis will estimate construction noise levels based on projected activity and equipment usage for various stages of construction within the Project Area. The projected construction noise levels will be compared to existing condition noise levels as determined based on measurements augmented by mathematical models and projections as necessary. The noise analysis will identify potential construction noise impacts based on the intensity, duration, and location of emissions relative to nearby sensitive locations. As necessary, feasible and practicable project-specific control measures to further reduce construction noise disruption to the surrounding community will be considered.

Construction activities have the potential to result in vibration levels that may result in structural or architectural damage, and/or annoyance or interference with vibration-sensitive activities. A construction vibration assessment will be performed. This assessment will determine critical distances at which various pieces of equipment may cause damage or annoyance to nearby buildings based on the type of equipment, the building construction, and applicable vibration level criteria.

Should it be necessary for certain construction equipment to be located closer to a building than its critical distance, vibration mitigation options will be proposed.

OTHER TECHNICAL AREAS

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

TASK 21: EFFECTS ON DISADVANTAGED COMMUNITIES

Section 8-0109(2)(k) of the New York State Environmental Conservation Law requires that an EIS includes a statement of the effects of the Proposed Approvals on disadvantaged communities, including whether the actions may cause or increase a disproportionate pollution burden. An assessment will be prepared to comply with Section 8-0109(2)(k) and any relevant regulations or guidance in effect at the time of DEIS preparation. The assessment will address any potential adverse impacts on Disadvantaged Communities[17] that could result from the RWCDS. The assessment will establish the study area (generally half a mile), identify potential adverse environmental impacts, and determine whether potential adverse environmental impacts are likely to result in a disproportionate pollution burden on a Disadvantaged Community, recognizing that impacts may be different than impacts to the general population. The existing environmental burden on any Disadvantaged Communities within the study area will be described and the potential for a disproportionate pollution burden will be evaluated.

TASK 22: ALTERNATIVES

An analysis of alternatives to the Proposed Project is required under SEQRA. The purpose of an Alternatives analysis in an EIS is to examine reasonable and feasible options that avoid or reduce project-related significant adverse impacts, or introduce alternative site plans, while achieving the

[17] ECL § 75-0101(5) defines Disadvantaged Communities as communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socio-economic criteria, or comprise high-concentrations of low- and moderate- income households.

goals and objectives of the Proposed Project. The alternatives are usually defined once the full extent of the Proposed Project's impacts have been identified and may include an alternative(s) that reduces any significant adverse impacts identified in the EIS analyses. However, the alternatives analyzed must include a No Action Alternative, as required by SEQRA. If the Proposed Project results in unmitigated significant adverse impacts, the EIS will also include a No Unmitigated Significant Adverse Impacts Alternative.

Additionally, the EIS may include a Port Alternative, in which the Proposed Project's port program could exceed the *BMT Vision Plan*'s assumption of port development, either in SF, acreage, or intensity of on-site port program, as determined by BMTDC. As previously discussed, the details of this alternative will be developed by NYCEDC and BMTDC, and informed by market/developer responses to a RFEI.

TASK 23: MITIGATION

Where significant adverse impacts have been identified in the analyses discussed above, measures will be described to mitigate those impacts. This chapter will describe the practicable measures that could mitigate those impacts. These measures will be developed and coordinated with the responsible agencies, as necessary. Where impacts cannot be fully mitigated, they will be disclosed as unavoidable adverse impacts.

TASK 24: EIS SUMMARY CHAPTERS

In accordance with the *CEQR Technical Manual*, the EIS would include the following summary chapters, where appropriate to the Proposed Project:

Unavoidable Adverse Impacts, which summarizes any significant adverse impacts that are unavoidable if a proposed action is implemented regardless of the mitigation employed (or if mitigation is impossible).

Growth-Inducing Aspects of the Proposed Project, which generally refer to "secondary" impacts of a proposed action that trigger further development.

Irreversible and Irretrievable Commitments of Resources, which summarizes a proposed action and its impacts in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.) both in the immediate future and long term.

TASK 25: EXECUTIVE SUMMARY

The EIS will include an Executive Summary, which will summarize relevant material from the body of the EIS to describe the Proposed Project, its environmental impacts, measures to mitigate those impacts, and alternatives to the Proposed Project. ✷