

100 Gold Street Redevelopment Project

Draft Scope of Work for an Environmental Impact Statement

A. INTRODUCTION

This Draft Scope of Work (DSOW) outlines the technical areas to be analyzed in the preparation of an Environmental Impact Statement (EIS) for the proposed 100 Gold Street Redevelopment Project (the Proposed Project).

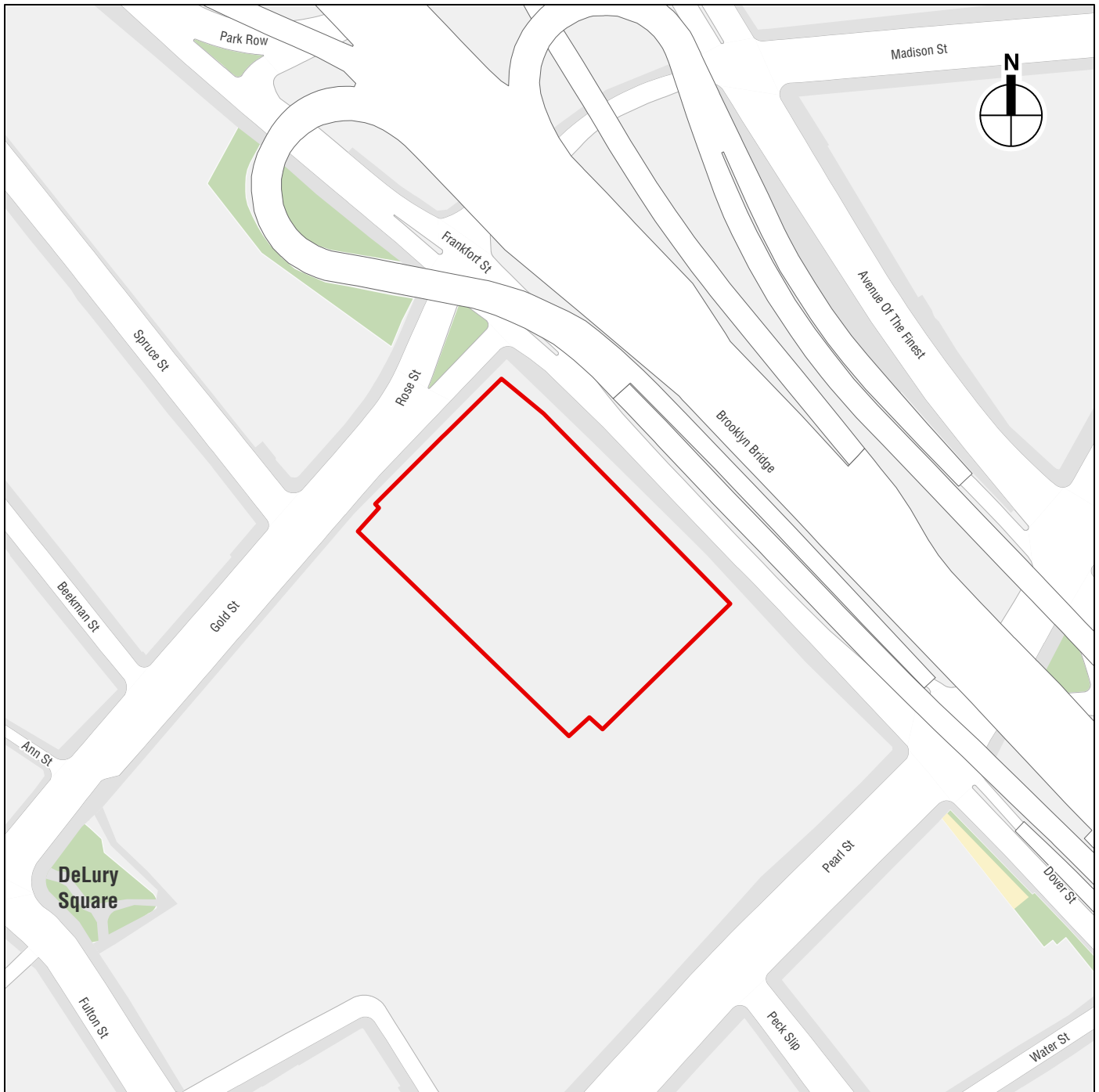
GFP Real Estate LLC (GFP), the developer, and the New York City Economic Development Corporation (NYCEDC), in conjunction with the New York City Department of Citywide Administrative Services (DCAS) and the New York City Department for the Aging (NYC Aging) (each a co-applicant, and collectively, the Applicant), propose the actions listed below in section D (the Proposed Actions) to facilitate the redevelopment of 100 Gold Street (Manhattan Block 94, part of [p/o] Lot 25, the Development Site).¹ The Development Site is an approximately 86,502-square-foot (sf) City-owned corner lot located at the intersection of Gold and Frankfort Streets in Lower Manhattan in Community District 1 (see **Figures 1 and 2**).

The Proposed Actions would facilitate a new mixed-use building (the Proposed Development) with up to approximately 3.4 million gross square feet (gsf). Under the conservative, reasonable worst case development scenario (RWCDs) that will be analyzed in the EIS, the building would have up to approximately 2.6 million zoning square feet of floor area (zsf), reflecting a built floor area ratio (FAR) of 30.0 (the maximum permitted under the Proposed Actions) and would contain: approximately 4,000 dwelling units (DUs),² of which at least 25 percent would be affordable pursuant to Mandatory Inclusionary Housing (MIH); approximately 66,000 gsf of non-residential area, including a new 18,000-gsf NYC Aging-funded Older Adult Center to replace the existing Older Adult Center on the Development Site; approximately 43,000 gsf of recreational facility (commercial gym available to the public); and approximately 5,000 gsf of local retail space. In addition, approximately 40,000 sf (0.9 acres) of new public realm improvements, of which approximately 22,000 sf (0.5 acres) would be publicly accessible open space and the 18,000-sf (0.4-acre) remainder would be sidewalk widenings and other open areas would be provided on the Development Site. The building would also have 250,125 gsf of dedicated mechanical space.

The Proposed Actions (described in detail below) are discretionary approvals subject to City Environmental Quality Review (CEQR) and the Uniform Land Use Review Procedure (ULURP) and have been determined to be a Type I action for the purpose of environmental

¹ The Development Site does not include the portions of Tax Lot 25 that are to the northeast of the Street Widening Line identified on the tax map, which are areas that are now included on the City Map as part of Frankfort Street (widened to its current width in 1966).

² The 4,000-DU residential program for the RWCDs represents a conservative scenario relative to other CEQR analyses. Whereas, under CEQR, RWCDs for new residential developments built pursuant to rezonings typically project the number of DUs by dividing the gross residential area by 850, if this was applied to the Proposed Actions, there would be a residential program of approximately 3,627 DUs based on up to approximately 3,083,000 gsf of residential space.

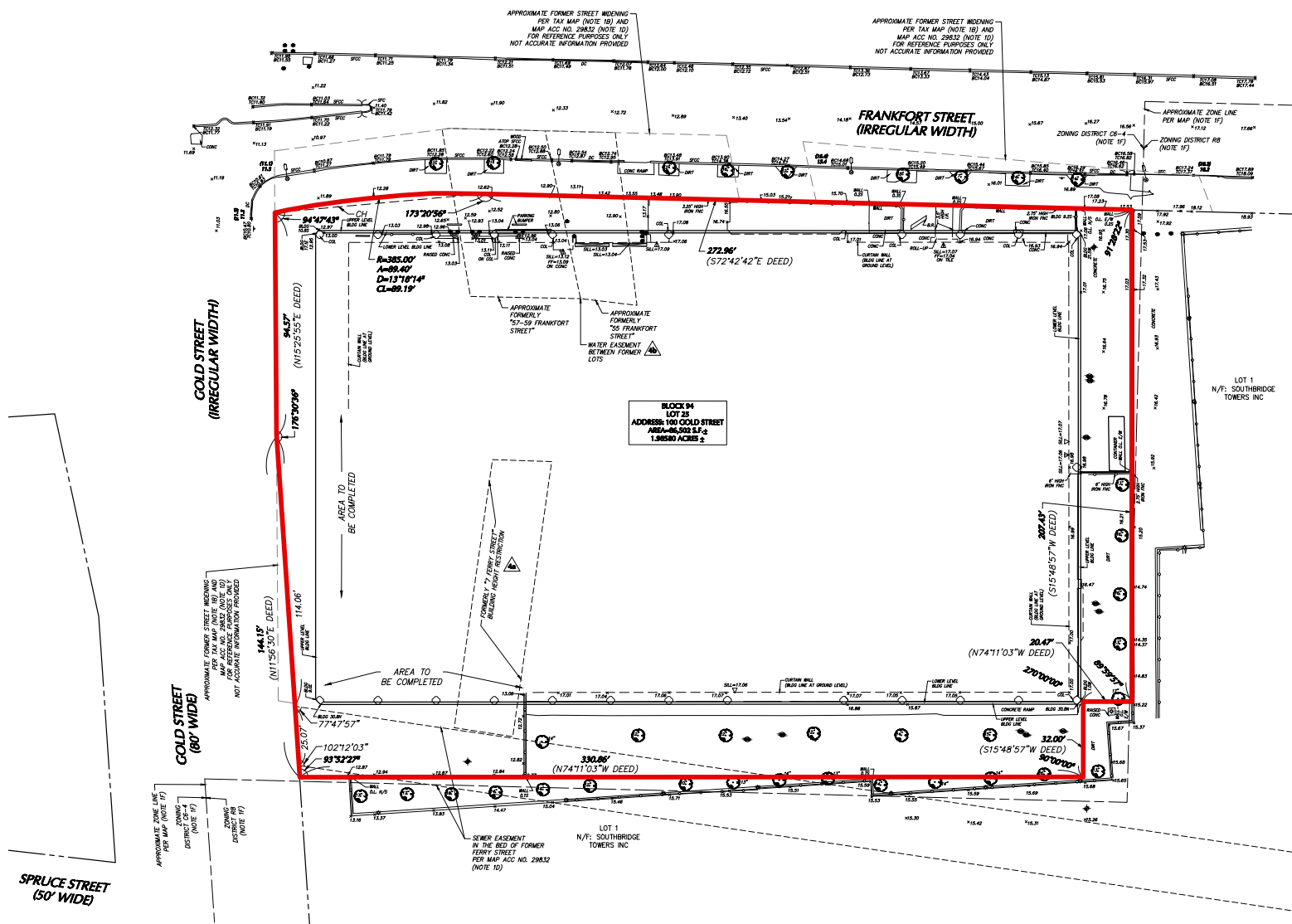


0 200 FEET

 *Development Site*



Project Location



 Development Site

Existing Site Plan
Figure 2

review, subject to Title 6 of New York Codes, Rules, and Regulations (NYCRR), Part 617.4, paragraph (b)(5)(v). The Office of the Mayor, by and through the Deputy Mayor for Housing and Planning, is serving as the lead agency for the environmental review and, as disclosed in the Environmental Assessment Statement (EAS), has determined that the Proposed Actions are likely to result in significant adverse impacts. Therefore, in coordination with this DSOW and pursuant to 6 NYCRR 617.7, the lead agency is also issuing a Positive Declaration.

The EIS is a two-step process consisting of the Draft EIS (DEIS) followed by the Final EIS (FEIS). This DSOW provides a description of the Proposed Actions, identifies the Proposed Development and its RWCDs, and provides a framework for analyzing the potential environmental impacts of the Proposed Actions.

B. PROJECT BACKGROUND

DEVELOPMENT SITE AND ZONING MAP AMENDMENT AREA

As described below, in addition to the Development Site, the limits of the area affected by the proposed zoning map amendment include a small portion of the adjoining site, but this would not materially affect the future built conditions of any other sites.

THE DEVELOPMENT SITE

Located in Lower Manhattan near the Civic Center and Seaport neighborhoods, the Development Site is an approximately rectangular corner lot with approximately 86,502 sf of lot area, having approximately 239 feet of frontage on Gold Street and approximately 385 feet of frontage on Frankfort Street, both of which are wide streets as defined by zoning. The Development Site's block is a superblock created through demapping actions in the 1960s and it is bound by open areas to the south and east that were formerly mapped streets (Ferry Street and Cliff Street) and which form part of the Southbridge Towers apartment complex campus (Block 94, Lot 1). The Brooklyn Bridge approach structure is immediately north of and follows the same course as Frankfort Street. Additionally, alongside the bridge approach structure and within the Frankfort Street right-of-way there are two elevated vehicular ramps that provide access to the Brooklyn-bound lanes of the Brooklyn Bridge for vehicles traveling from Pearl Street and the Franklin D. Roosevelt (FDR) Drive (these ramps merge as they cross above the eastern street line of Gold Street).

The Development Site is improved with a nine-story plus cellar building (the Existing Building), which contains approximately 655,775 gsf. This approximately 112-foot-tall building (roof height) occupies approximately 65,000 sf of the lot and rises to the roof without setback. As such, the building occupies approximately three-quarters of the Development Site's lot area. Built in 1969, this Brutalist style building was originally called the Tishman Downtown Center and later the Bache Building and has been City-owned since 1993. It contains City and non-profit office uses and the City Hall Older Adult Center (耆英會), currently operated by Hamilton Madison House with funding from NYC Aging.

Besides the building, the Development Site includes approximately 21 off-street surface accessory parking spaces located along the northern, eastern, and southern edges of the building, which include 10 designated electric vehicle (EV) charging parking spaces and five EV charging stations (each station is capable of charging two vehicles).

In terms of zoning, the Development Site lies almost entirely within a C6-4 zoning district, with less than 0.1 percent of its lot area lying within an R8 district. This C6-4 zoning has been in

place since the establishment of the 1961 Zoning Resolution while this R8 zoning was mapped as part of a land use application in 1968 to facilitate Southbridge Towers. The entirety of the Development Site is within the Special Lower Manhattan District (“LM Special District”).

Additional information on the existing conditions of the Development Site is provided below under “Purpose and Need for the Proposed Development.”

AREA SUBJECT TO THE PROPOSED ZONING MAP AMENDMENT

Under the Proposed Actions, the Development Site would be rezoned to R12 with a C2-5 commercial overlay while remaining in the LM Special District³. The proposed rezoning area is bounded by Frankfort Street on the north, a line perpendicular to Frankfort Street and starting at a point on Frankfort Street 250 feet west of Pearl Street on the east, a line perpendicular to the eastern boundary and 250 feet south of the Frankfort Street starting at a point 250 feet south of Frankfort Street where it meets the eastern boundary on the south, and Gold Street on the west. A small portion of the adjoining Southbridge Towers property, representing less than 1 percent of its total area, also lies within the rezoning area.

PROJECT BACKGROUND AND REQUEST FOR PROPOSALS

The Existing Building was conceptualized as a private office building in the mid-1960s, designed by Gruzen & Partners, and fully constructed by 1970. The City leased office space in the Existing Building for decades, and in 1993 the City purchased the building to consolidate its operations that were previously spread across the Financial District. DCAS estimates that the Existing Building faces over \$220 million in capital needs, simply to bring it to a state of good repair.

In August 2024, then-Mayor Adams issued Executive Order 43 (EO 43), requiring City agencies to review City-owned and controlled land for potential housing development sites, in support of the administration’s goal to build 500,000 new homes by 2032. The Development Site was identified as a site that offers a significant opportunity for large-scale residential redevelopment, in particular due to its large size (over 85,000 sf), proximity to a wide array of public transit options, and the age and condition of the Existing Building as described above. The 2025 State of the City address, which outlined the “Manhattan Plan,” announced that the Development Site would be advanced for a proposed major residential redevelopment, as one of the first sites identified under the EO 43 initiative.

In March 2025, EDC and the New York City Department of Housing Preservation and Development (HPD) jointly released a competitive request for proposals (the “RFP”) to identify a developer for the Development Site, and in December 2025, GFP was selected. Shortly thereafter, the Department of City Planning released *The Manhattan Plan* housing framework, which aimed to add 100,000 new homes in Manhattan over the next decade, and highlighted

³ The proposed rezoning area encompasses the portion of the Development Site within the existing C6-4 zoning district (as noted above, this area encompasses over 99 percent of the Development Site) but not the small portion of the Development Site within the R8 zoning district, so the Development Site would continue to be split between two zoning districts. Based on the zoning rules governing split lots (Article VII, Chapter 7 of the Zoning Resolution of City of New York), the small R8 portion would qualify to be treated the same as the rest of the site—as R12/C2-5 (LM Special District) under the proposed rezoning.

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the Proposed Development as a Featured Project in its discussion of strategy on City-owned sites.

On January 1, 2026, Mayor Mamdani issued Executive Order 4 (EO 4), establishing the Land Inventory Fast Track (LIFT) Task Force to review and identify sites owned and controlled by the City that are appropriate to support at least 25,000 new housing units over the next ten years. Subsequently, on May 26, 2026, Mayor Mamdani and Deputy Mayor for Housing and Planning Leila Bozorg released “Block by Block: The Housing Plan for a New Era,” a housing plan to add 200,000 new affordable homes and preserve another 200,000 existing affordable homes over the next decade. Section 4.2 of the Block by Block plan states the administration’s intent to spearhead “ambitious and equitable rezonings that allow more housing to be built by the City and private actors alike,” to “create new affordable homes without relying on the availability of public subsidy,” identifies the need to maximize the potential of City-owned land that can support new housing, and highlights the Proposed Development as “a perfect example of how the City can strategically leverage its real estate assets to avoid wasteful spending while advancing housing production,” thereby “delivering housing, modern civic infrastructure, and long-term fiscal value for New York taxpayers.”

URBAN RENEWAL PLAN

The Development Site is located within the former Brooklyn Bridge Southwest Urban Renewal Area (the URA) (the general area of which is bound by Nassau Street on the west, the Brooklyn Bridge/Frankfort Street, Pearl Street on the east, and Beekman and Fulton Streets on the south). The urban renewal plan for the URA (the URP) included the consolidation of the blocks east of Gold Street into a superblock bounded by Frankfort, Pearl, Fulton, and Gold Streets. This included the demapping of former Beekman, Ferry, Cliff, and Jacob Streets, the creation of an unmapped pedestrian street running from Fulton Street to Pearl Street through the southeast corner of the superblock, and the widening of Frankfort and Gold Streets through land acquired by the City. The superblock was then developed with residential and commercial uses including the Existing Building on the Development Site, which was designated in the URP for “general central commercial” uses (e.g., offices and retail) and the Southbridge Towers which were built in 1971 as a subsidized co-op under the Mitchell-Lama housing program. The URP also led to the development of the Pace University campus and New York-Presbyterian Lower Manhattan Hospital buildings located adjacent to the Development Site. The URP was initially adopted in 1964 (CP-18244) and last amended in 1997 (C 960181 HUM) in connection with a site selection action that updated the Development Site’s “general central commercial” designation to permit an Older Adult Center of not more than 20,000 sf at 100 Gold Street, which also was facilitated by a concurrent site selection approval (C 960180 PSM). The URP expired on April 9, 2004.

PRIOR LAND USE APPROVALS

The Development Site was affected by certain changes to the City Map in the 1950s and 1960s, including a 1957 mapping action that widened portions of Frankfort Street and a 1966 mapping action in connection with the URP that, among other things: (1) further widened Frankfort Street to its current street line location adjoining the Development Site; (2) demapped former Jacob Street (which was located within the current bounds of the Development Site), Cliff Street (to the east of the Development Site) and Ferry Street (to the south of the Development Site); and (3) established a sewer easement within former Ferry Street.

In 1993, the Development Site was subject to an action for city office space acquisition approval pursuant to Section 195 of the New York City Charter for use of the entire nine-story plus cellar Existing Building (N 930424 PXM).

In 1997, site selection approval and an amendment of the URP were obtained to permit the Older Adult Center to be located within the Existing Building on the Development Site (C 960180 PSM and C 960181 HUM). Prior to such URP amendment, the Development Site had been designated only for general central commercial use.

In 1998, the LM Special District was established, consolidating regulations for several former special district areas in Lower Manhattan into a comprehensive set of controls. As stated in the City Planning Commission report adopting the new text for the LM Special District (N 980314 ZRM), the objectives of the LM Special District included fostering the reuse of existing underused commercial buildings and allowing a wider range of commercial uses that better support an increasing residential population.

The Existing Building currently houses offices for the following city agencies: HPD, Department of Education (DOE), NYC Parks (DPR), DCAS, and Office of Collective Bargaining (OCB). The Existing Building also houses offices for the Mayor's Office, GrowNYC (an environmental non-profit organization),⁴ and an NYC Aging Older Adult Center, which is currently operated by Hamilton Madison House.

DESCRIPTION OF THE SURROUNDING AREA

The Development Site is located in downtown Manhattan, within Manhattan Community District 1, at the southeast intersection of Gold Street and Frankfort Street. The Development Site is situated at the intersection of multiple neighborhoods, with the Financial District to the south, Fulton/Seaport to the east, and the Two Bridges and Civic Center areas to the north of the Brooklyn Bridge. An elevated portion of the Brooklyn Bridge lies immediately to the north of the Development Site, with support structures for one of its access ramps located within the bed of Frankfort Street.

The Development Site is primarily within a C6-4 zoning district within the LM Special District, and within the City's designated Coastal Zone. Other zoning districts within a 600-foot radius of the Development Site are R8, C6-2A and R7-2 districts. The R8 district, C6-2A district and portions of the C6-4 district (generally south of Frankfort Street) are within the LM Special District, with the C6-2A district lying within the South Street Seaport Subdistrict.

The Southbridge Towers residential complex (Block 94, Lot 1) occupies the remainder of the superblock to the south and east of the Development Site (approximately coincident with the R8 district), consisting of four 27-story towers and five low-rise buildings of six stories or less. Other buildings in the immediately surrounding area include Pace University New York City Campus (Block 102, Lot 1) and New York Presbyterian Lower Manhattan Hospital (Block 100, Lot 1) to the west and southwest across Gold Street from the Development Site, and 8 Spruce

⁴ Council on the Environment Inc., doing business as GrowNYC, is a New York non-profit public benefit 501(c)(3) organization. It was established by mayoral executive order in 1970 as the Mayor's Council on the Environment and renamed the Council on the Environment of New York City (CENYC) in 1972. It receives funding from the City and, as noted in its Consolidated Financial Statements, June 30, 2025, "Office space is donated to the Organization by the City of New York for an indefinite time period."

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Street (Block 100, Lots 1201–1204), a 76-story, 860-foot-tall residential tower to the immediate west of New York Presbyterian. There is also a public school in the base of 8 Spruce Street, PS 397. 375 Pearl Street (the former Verizon Building) (Block 113, Lots 1001–1009), a 32-story, 540-foot-tall office tower sits north of the Development Site on the north side of the Brooklyn Bridge from the Development Site, and the Smith Houses (Block 111, Lot 100), a New York City Housing Authority (NYCHA) development consisting of twelve 17-story residential buildings are situated in the R7-2 zoning district to the northeast of the Development Site beyond the Brooklyn Bridge.

While the area immediately surrounding the Development Site is characterized by a mix of uses, the heart of the Financial District to the south of the Development Site is a short walk away; this area is predominantly commercial, consisting of buildings ranging in height from 15 to over 50 stories, many of which were constructed prior to the enactment of the ZR in 1961. Many of these existing pre-1961 buildings have much more floor area than would be permitted for new buildings under the ZR. For example, 40 Wall Street has a built FAR of approximately 31 while the highest maximum permitted FAR, including all bonuses, in the LM Special District is 21.6. This area is generally zoned C5-3, C5-5 and C6-9 within the LM Special District, which allows a maximum base floor FAR of 15.0 for non-residential uses, increasable to a maximum of 21.6 FAR through floor area bonuses and development rights transfers. These districts are limited to 10.0 FAR for standard residences/12.0 FAR with qualifying affordable housing. The residential FAR limitations and the obstacles to conversions of large commercial buildings (e.g., floorplates and mechanical systems that are not suitable for residential occupancy) are factors that perpetuate the predominantly commercial character of this area, although there has been a recent increase in residential conversions in Lower Manhattan pursuant to Article I, Chapter 5 of the ZR, growing out of the evolution of City policies to alleviate some of the attendant obstacles to such conversions, including 25 Water Street, 160 Water Street, 180 Water Street, 55 Broad Street, 20 Broad Street, and 111 Wall Street (currently underway).

The Development Site is well-served by ample public transit. The Fulton Street subway station entrance to the 2/3 subway lines and the A/C subway lines at Fulton and William Streets are located approximately four blocks to the southwest of the site, and also provide access to the J, Z, 4, and 5 lines within the Fulton Transit Center located at Fulton Street and Broadway. City Hall station accessing the R and W lines and Brooklyn Bridge-City Hall/Chambers Street hub accessing the 4, 5, 6, J, and Z are also within ¼ mile. Several bus lines run along Pearl Street on the east side of Block 94 (BM1, BM2, BM3, BM4, QM7, QM8, QM11, QM25, M15, SIM5, SIM15, SIM35), a half-block east of the Development Site. The Development Site is also served by other bus routes in the surrounding area, including the M9, M22, and M103 local bus routes, and numerous inter-borough express bus routes. Pier 11/Wall Street ferry landing, serving several Citywide Ferry Service routes by NYC Ferry and intercity routes by NY Waterway, is approximately a 15-minute walk from the Development Site. A Citi Bike docking station is located on the Gold Street sidewalk adjacent to the Development Site, and Frankfort Street contains a striped bike lane running along the Development Site's frontage.

C. PROJECT DESCRIPTION

Pursuant to the approval of the Proposed Actions (described below), based on preliminary designs, the Proposed Development would be a building with a single, 15-story podium base and two towers and would include an approximately 115-story, 1,290-foot-tall (top of roof screen) tower facing Gold Street and an approximately 78-story, 901-foot-tall (top of roof

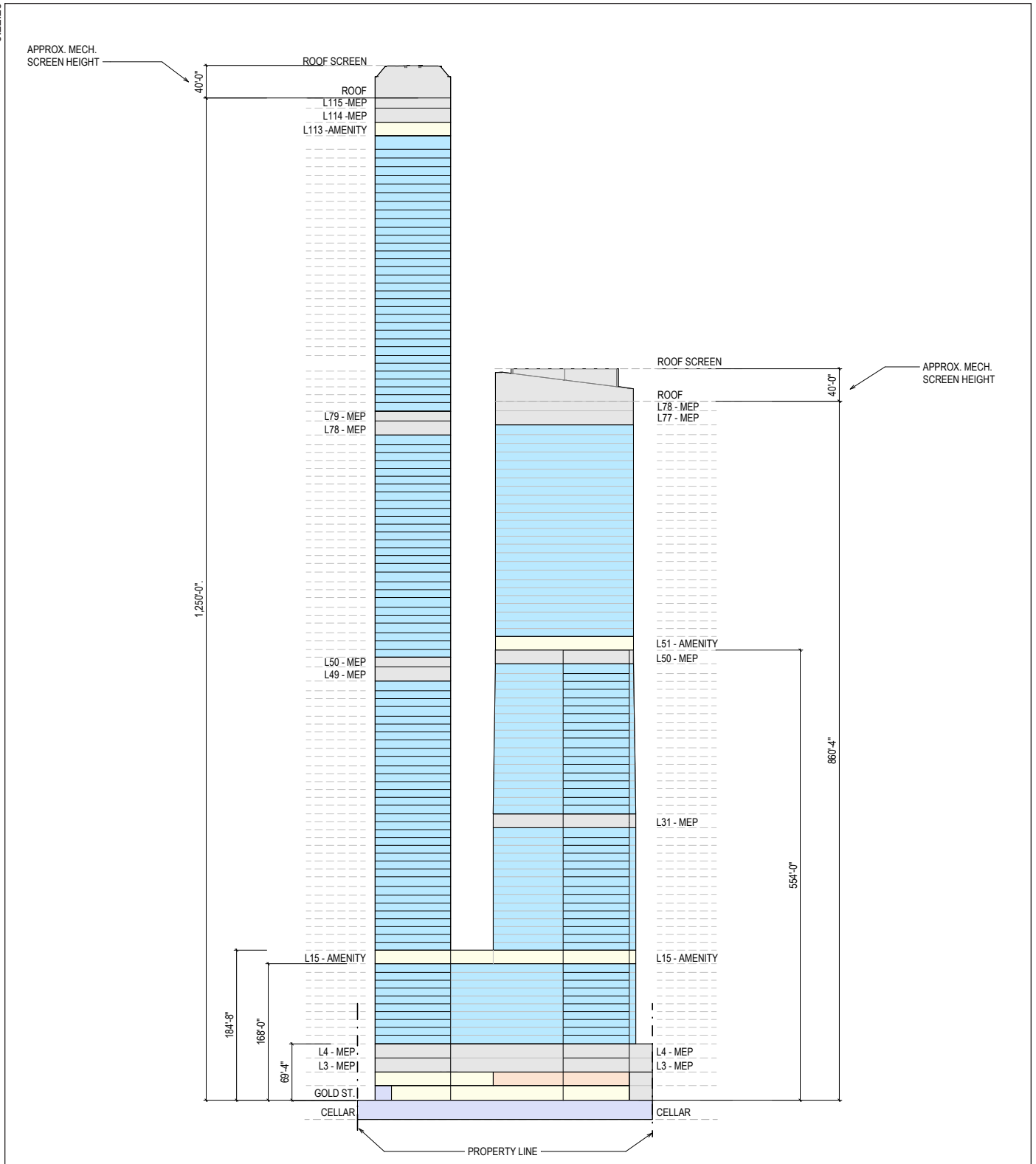
screen) tower facing Frankfort Street.⁵ The development program would include approximately 4,000 DUs, of which a minimum of 25 percent would be MIH affordable housing units for average household incomes of 60 percent of area median income (AMI). In addition, on the ground floor and in one cellar level the Proposed Development would include approximately 5,000 gsf of local retail, 43,000 gsf of recreational facility (commercial gym available to the public), an 18,000-gsf new facility for the existing Older Adult Center, and approximately 40,000 sf of public realm improvements, including an approximately 22,000-sf public open space. The building would also have 250,125 gsf of dedicated mechanical space. The Proposed Development would not include any public or accessory motor vehicle parking. In addition to serving the Proposed Development's residents and workers, the recreational facility, local retail, and public open space would also expand options in these respective areas available to the local community. Based on a preliminary schedule, the Proposed Development would be constructed in continuous stages over an approximately seven-year period from 2030 to 2037, with full occupancy occurring in 2038. Prior to the initiation of project construction, the Older Adult Center would be temporarily relocated to a facility in the vicinity to ensure continued operations. Offices at the existing building would be permanently relocated elsewhere. Under the RWCDs, the Proposed Development would have a built FAR of approximately 30 and the building would be subject to controls described in Section D below. In the absence of the Proposed Development, i.e., the No Action condition, in which the Development Site remains City-owned, the building would continue to house City agencies and the Older Adult Center. Refer to **Figures 3 and 4**.

D. PROPOSED ACTIONS

The Proposed Development would require approval of the following City discretionary actions: GFP and NYCEDC seek:

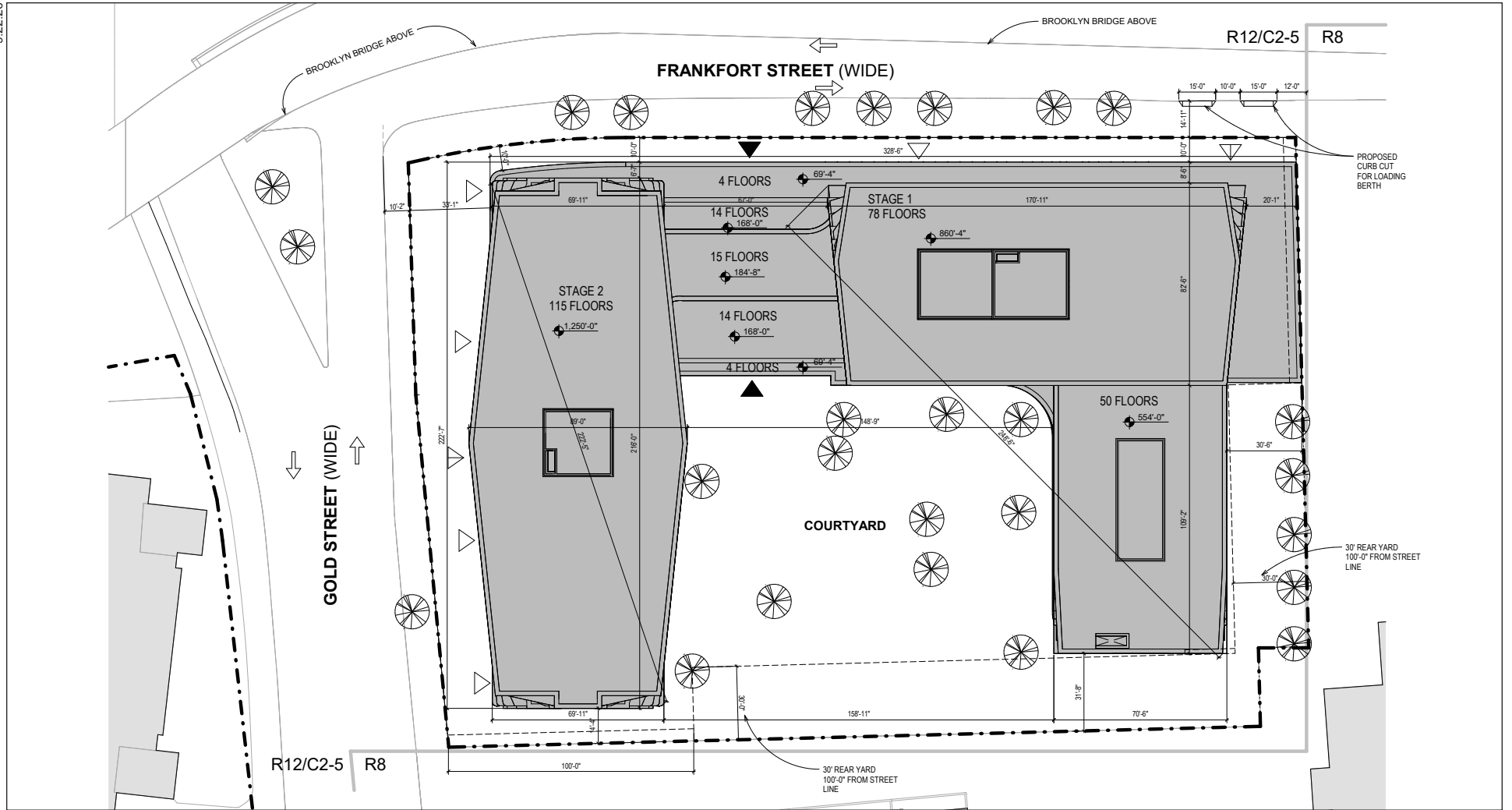
- A zoning map amendment to rezone the Development Site from a C6-4 district (the Rezoning Area) to an R12 district with a C2-5 overlay;
- Zoning text amendments to the Zoning Resolution of the City of New York (ZR) to:
 - Amend the LM Special District regulations (ZR 91-00 et seq.) to establish:
 - Applicable floor area regulations for the C2-5/R12 district, including a basic maximum residential FAR of 30 for sites in the R12 district that provide qualifying affordable housing;
 - Special bulk modifications for certain sites within the C2-5/R12 district allowing for a reduction of required setback distance and exemption from maximum horizontal tower dimension requirements;
 - A new category of pedestrian circulation space that may be counted toward meeting the minimum pedestrian circulation space requirement in the C2-5/R12 district; and
 - Special loading provisions allowing certain sites within the C2-5/R12 district to be exempt from the loading berth location restrictions of ZR 36-663.

⁵ Roof screens would extend vertically up to an additional approximately 40 feet above the roof lines.



- RESIDENTIAL
- COMMUNITY FACILITY, OLDER ADULT CENTER
- RESIDENTIAL AMENITY
- COMMERCIAL RETAIL, RECREATIONAL FACILITY
- MEP, BACK OF HOUSE

FOR ILLUSTRATIVE PURPOSES ONLY



LEGEND

- TAX LOT
- ZONING LOT LINE
- ZONING DISTRICT BOUNDARY
- ILLUSTRATIVE BUILDING LINE
- ROAD DIRECTION
- R12/C2-5 ZONING DISTRICT
- EXISTING BUILDING FOOTPRINT
- PROPOSED BUILDING FOOTPRINT
- ILLUSTRATIVE BUILDING HEIGHT TO TOP OF ROOF
- TREE
- COMMERCIAL ACCESS POINT
- RESIDENTIAL ACCESS POINT
- LOADING ACCESS POINT

RWCDs Site Plan
Figure 4

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- Amend Appendix F: Mandatory Inclusionary Housing Areas and Former Inclusionary Housing Designated Areas for Manhattan Community District 1 to establish the Rezoning Area as a MIH area;
- An authorization pursuant to ZR 36-72 for a reduction of required bicycle parking;

DCAS seeks:

- Disposition approval of the Development Site.

NYC Aging (with DCAS as co-applicant) seeks:

- Acquisition approval to acquire space to house the Older Adult Center within the Proposed Development in order to facilitate the Older Adult Center's return to the Development Site.
- Site selection approval in the event project stakeholders determine that the relocation of the Older Adult Center to its proposed temporary location would be preferred as its permanent site rather than returning to the Development Site.

In addition, to facilitate the Proposed Development, other City approvals such as from the Public Design Commission and for an easement delineation to eliminate an existing sewer easement shown on the City Map as traversing Block 94 would be necessary. The latter approval is being sought by the developer pursuant to a separate, concurrent land use application.

OLDER ADULT CENTER RELOCATION

The Developer would facilitate the relocation of the Older Adult Center to a temporary location, which is expected to be within a 10-block radius of the Development Site. The relocation would occur prior to the initiation of project construction. The Developer would be responsible for paying all costs associated with the relocation, rent, leasing fees, and fit-out of the new facility, which must be in turnkey condition acceptable to NYC Aging prior to relocation.

The Developer is seeking a site selection action in the event project stakeholders determine that a permanent relocation of the Older Adult Center would be preferred to the temporary relocation. Under this scenario, the space that is intended to be programmed for that use would instead be dedicated to accessory uses such as residential amenity space. The EIS will also assess the environmental effects of conditions on the Development Site under this alternate scenario.

PURPOSE AND NEED

The purpose of the Proposed Project is to replace an underutilized and outmoded City-owned asset with a new mixed-use development that addresses several major needs facing the City. The goals of the Proposed Project include addressing the City's housing crisis by providing a substantial number of new housing units of which at least 25 percent will be permanently affordable, redeveloping the Development Site with a density appropriate for its location in Lower Manhattan, creating a contemporary and resilient building, and enhancing street-level activity through a large recreational facility including a commercial gym available to the public and public new open space. The existing Older Adult Center will be replaced with a new and substantially improved facility as part of the Proposed Project.

The Development Site is located in an area very well-served by transit services with a range of modes including multiple subway routes and stations, local and express bus routes, ferry

routes, and bike share stations. It is also one of the few large, City-owned sites in Lower Manhattan suitable for high density redevelopment.

More specifically, the Proposed Project would:

- Create a substantial amount of new market-rate and income-restricted affordable housing without the use of publicly assisted financing, thereby substantially increasing the City's housing supply and allowing the City's limited financial resources to be used for other projects;
- Increase the supply of publicly accessible open space and related public realm improvements in the area that would complement the planned Gotham Park to the north, residents' plazas at Southbridge Towers to the south, and other nearby resources such as DeLury Square and City Hall Park;
- Replace an obsolete commercial building that would be expensive and inefficient to maintain, while facilitating the relocation of essential City offices to better and more contemporary office space funded with proceeds from the disposition of the Development Site;
- Advance sustainability as one of the largest buildings meeting new City and State standards adopted to meet energy efficiency and resiliency benchmarks as an important "proof of concept" model project at scale;
- Provide a new and substantially improved Older Adult Center, fulfilling the City's continuing commitment to serving its older adult population;
- Support community development through the provision of quality construction and building service jobs while adhering to Affordable Neighborhoods for New Yorkers (ANNY) Tax Incentive program (485x) wage standards and labor protections;
- Leverage recent major capital investments in transit infrastructure including Fulton Center, World Trade Center PATH terminal, NYC Ferry system, and expansion of Citi Bike, and capitalize on other public investments in the area, such as the East River Esplanade and the Brooklyn Bridge-Montgomery Coastal Resilience project; and
- Create residences in proximity to existing commercial districts in the Financial District, World Trade Center, Civic Center, and Downtown Brooklyn. This would be consistent with the City's priorities for promoting walk-to-work opportunities that reinforce the high density, mixed-use development character of these areas that are major economic engines.

E. ANALYSIS FRAMEWORK

The analysis framework lays out the conditions upon which the potential impacts of the Proposed Development will be measured. The EIS will account for existing conditions, the Future without the Proposed Development (No Action condition), and the Future with the Proposed Development (With Action condition). The incremental difference between the future No Action condition and future With Action condition serves as the basis for identifying potential environmental impacts, as described below. **Table 1** summarizes the RWCDs identified for analysis purposes in the EIS.

Table 1

Summary of RWCDs for the 100 Gold Street Redevelopment Project

Use	Existing	No Action	With Action	Increment
Office (City Agencies) (GSF)	627,275	627,275	0	-627,275
Office (non-profit) (GSF)	10,500	10,500	0	-10,500
Recreational facility (commercial gym available to the public) (GSF)	0	0	43,000	+43,000
Local Retail (GSF)	0	0	5,000	+5,000
<i>Commercial uses, total (GSF)</i>	<i>637,775</i>	<i>637,775</i>	<i>48,000</i>	<i>-589,755</i>
Older Adult Center (GSF)	18,000	18,000	18,000	0
Residential (GSF)	0	0	3,083,000	+3,083,000
Market Rate Residential DUs @ 75%	0	0	3,000	+3,000
MIH Affordable Residential DUs @ 25%	0	0	1,000	+1,000
<i>Residential DUs, total</i>	<i>0</i>	<i>0</i>	<i>4,000</i>	<i>+4,000</i>
Dedicated mechanical (GSF)	0	0	250,125	+250,125
Publicly Accessible Open Space (SF)	0	0	22,000	+22,000
<i>Publicly Accessible Open Space (Acres)</i>	<i>0</i>	<i>0</i>	<i>0.5</i>	<i>+0.5</i>
Parking (Spaces)	21 ^a	21	0	-21
Total GSF	655,775	655,775	3,399,125	+2,743,350
Workers ^b	2,459	2,459	279	-2,180
Residents ^b	0	0	8,080	+8,080

^a 10 of the 21 spaces are dedicated EV charging parking spaces, associated with the City's on-site EV chargers.

^b Refer to the EAS Form for information on how these numbers were identified.

THE FUTURE WITHOUT THE PROPOSED DEVELOPMENT (NO ACTION CONDITION)

Absent the Proposed Development, none of the Proposed Actions would be sought or approved, the Development Site would remain City-owned, and the existing building would continue to house offices and the Older Adult Center. Accordingly, the building and the Development Site's development program under No Action conditions would remain as under existing conditions, and would consist of 637,775 gsf of office space (including 627,275 gsf of City agencies office space and 10,500 gsf of non-profit office space), 18,000 gsf of older adult community facility, and approximately 21 on-site surface accessory parking spaces. The existing building has an estimated population of 2,459 workers (see **Table 1**).

THE FUTURE WITH THE PROPOSED DEVELOPMENT (WITH ACTION CONDITION)

In the With Action condition, the Proposed Development would be implemented and its RWCDs would be studied in the EIS. Under the RWCDs, the Proposed Development, based on preliminary plans, would be an approximately 3.4-million-gsf building with a single, 15-story podium base and two towers and one tower would include an approximately 115-story, 1,290-foot-tall (top of roof screen) tower facing Gold Street and the other tower would include an approximately 78-story, 901-foot-tall (top of roof screen) tower facing Frankfort Street. This building massing would represent a RWCDs for the With Action condition as it would fully utilize the maximum permitted 30 residential FAR and is a reasonably conservative arrangement of bulk under the special alternative bulk regulations permitted under the

proposed R12/C2-5 (LM Special District) zoning. Furthermore, it arranges bulk for both the podium and towers that would provide at-grade outdoor publicly accessible open space (thereby establishing the limits of the building footprint) and reflect efficient and functional building floorplates and floor heights. As such, this 1,290-foot-tall massing represents a conservative building massing for analysis purposes. The RWCDs development program would include approximately 4,000 DUs (in approximately 3.1 million gsf of residential space), of which a minimum of 25 percent of the DUs would be MIH affordable housing units for average household incomes of 60 percent of AMI). In addition, on the ground floor and in one cellar level the Proposed Development would include approximately 5,000 gsf of local retail, 43,000 gsf of recreational facility (commercial gym available to the public), an 18,000-gsf new facility for the existing Older Adult Center, and approximately 40,000 sf (0.9 acres) of public realm improvements. More specifically in terms of public realm improvements, this would include 22,000 sf (0.5 acres) of outdoor publicly accessible open space and 18,000 sf (0.4 acres) of other improvements consisting of widened sidewalks and new landscaping along the street frontages that are not considered “public open space” as defined in the *CEQR Technical Manual* for the purposes of quantitative open space analysis though they would be open areas available to the public (see **Table 1**). The Proposed Development would not include any public or accessory motor vehicle parking. Its projected population would include 8,080 residents and 279 workers. The Proposed Development would have a built FAR of approximately 30 and the building would be subject to controls described above in Section D.

PROJECT INCREMENT

As also shown in **Table 1**, the incremental (net) change in development resulting from the Proposed Actions would be: +4,000 DUs, of which approximately +3,000 DUs would be market rate and approximately +1,000 DUs would be MIH; +43,000 gsf of recreational facility (commercial gym available to the public); +5,000 gsf of local retail; +22,000 sf (+0.5 acres) of publicly accessible open space; -637,775 gsf of office space; -21 accessory parking spaces; and no change in Older Adult Center space. The incremental change in total building height would be: +1,178 feet. The incremental change in building population would be +8,080 residents and -2,180 workers.

BUILD YEAR

For the purposes of the environmental review, it is assumed that the Proposed Development would start construction in 2030. The Proposed Development has an expected construction duration of approximately seven years, with staged, continuous construction continuing until 2037. However, to reflect that full occupancy may not occur until 2038, an analysis year of 2038 is conservatively assumed for this environmental review.

Prior to the initiation of project construction, the Older Adult Center would be relocated temporarily to a facility in the vicinity to ensure continued operations. Likewise, offices at the building would be permanently relocated elsewhere. It is also anticipated that some of the proposed residential units would be occupied before the completion of construction.

F. ENVIRONMENTAL REVIEW PROCESS

CEQR 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 Mayor, by and through the Deputy Mayor for Housing and Planning is the CEQR Lead Agency for the Proposed Actions.

The Lead Agency, after reviewing the EAS, has determined that the Proposed Development 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 following the completion of the DEIS. That hearing record is held open for a minimum of 10 days following the open public session, at which time the public review of the DEIS ends. The Lead Agency then oversees preparation of a 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 Development.

SCOPING

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the proposed actions. 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 DSOW may do so and provide their comments in writing to the Lead Agency or orally at the public scoping meeting. The public scoping meeting will be held on Thursday, October 29, 2026, at Pace University, Student Center West, One Pace Plaza (entrance at the corner of Spruce Street and Park Row), New York, NY 10038, starting at 4:00 PM. The scoping meeting will include two opportunities for public comment: One at 4:00 PM with a presentation outlining the Proposed Project and Draft Scope of Work, followed by solicitation of public comments. The same presentation will be given again at 6:30 PM, followed by another opportunity to share comments.

Comments received during the public scoping meeting and written comments received up to ten days after the meeting (Monday, November 9, 2026, at 5:00 PM) will be considered and incorporated as appropriate into the Final Scope of Work (FSOW). The Lead Agency will oversee preparation of the FSOW, 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 FSOW.

G. . 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 2025 *City Environmental Quality Review Technical Manual (CEQR Technical Manual)*.

The EIS will contain:

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

The analyses for the Proposed Development will be performed for the year in which in the newly constructed building would be completed and occupied, 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 Development does not meet criteria warranting analysis of natural resources and no significant adverse impacts to natural resources would occur with the Proposed Development. However, for informational purposes, a natural resources chapter will be provided in the EIS. Below are descriptions of the environmental categories in the *CEQR Technical Manual* that will be analyzed in the EIS, with a description of the tasks to be undertaken.

TASK 1: PROJECT DESCRIPTION

The first chapter of the EIS, the Project Description, will identify and explain the proposed actions and the purpose and need for the proposed actions. It will also describe the Proposed Development. It will contain a brief discussion of current conditions on the Development Site and in the surrounding area; the No Action condition; the proposed development program for the Development Site; a description of the proposed site plan; and figures to depict the Proposed Development. The figures will present key project elements, such as a site/ground floor plan, elevations, and views of the project in its neighborhood context. It will also include a description of the approvals required and the approvals processes. The analytical framework including the No Action condition will also be included in this chapter.

The Project Description will include appropriate materials from the ULURP application. It will describe the role of the lead agency for CEQR as well as the environmental review and ULURP processes.

TASK 2: LAND USE, ZONING, AND PUBLIC POLICY

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

100 Gold Street Redevelopment Project

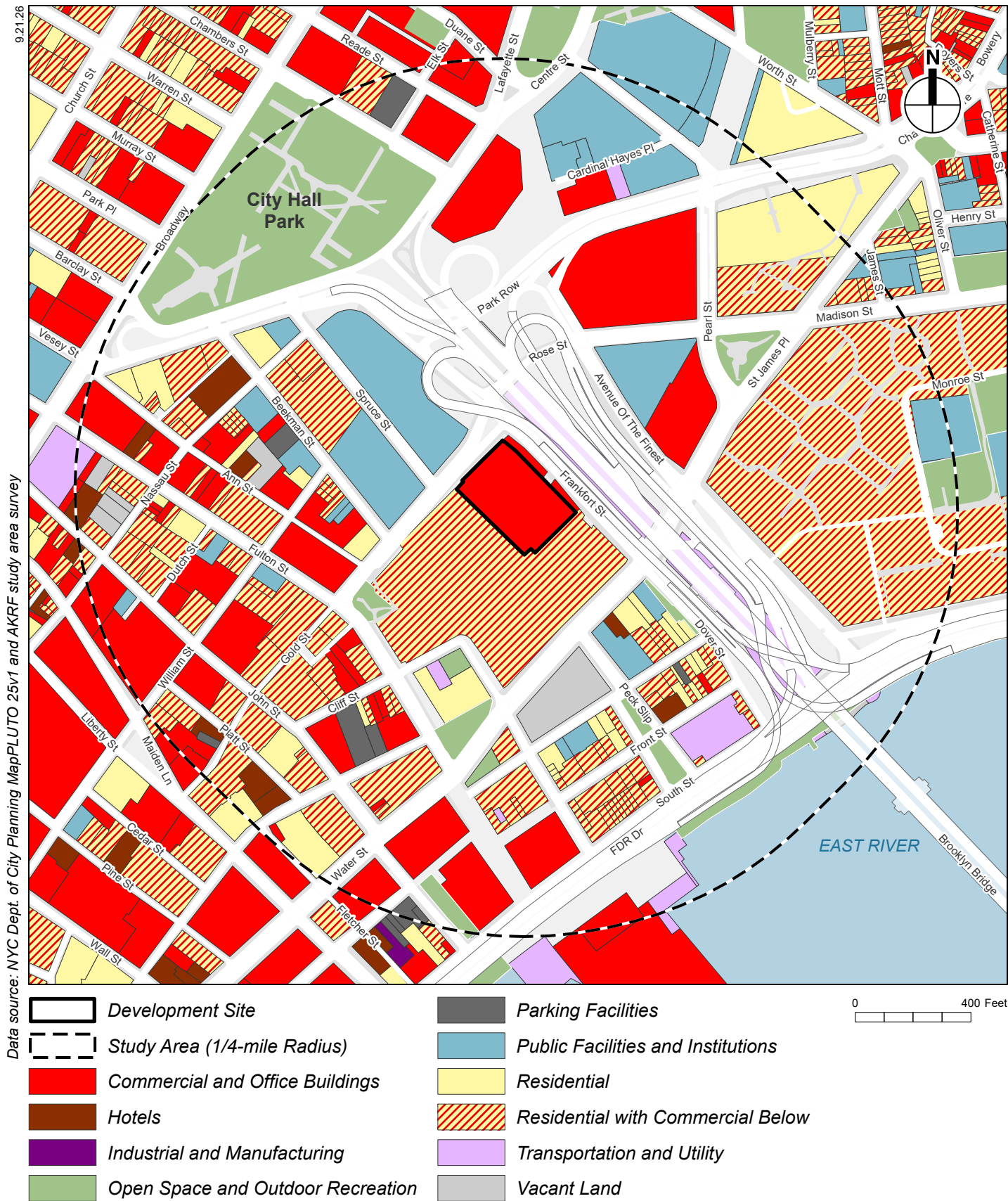
- Provide a brief development history of the Development Site and the study area. The study area will include the Development Site and the area within approximately ¼ mile.
- Describe predominant land use patterns in the study area, including recent development trends for the ¼-mile study area (see **Figure 5**).
- Provide a zoning map and discuss existing zoning and any recent zoning actions in the study area (see **Figure 6**).
- Summarize other public policies that may apply to the Development Site and study area, including specific development projects and plans for public improvement, as well as *Where We Live NYC*, *OneNYC 2050*, and *Block by Block: The Housing Plan for a New Era*. In addition, as the Development Site falls within the boundaries of the City's Coastal Zone, an assessment of the Proposed Actions' consistency with the City's Waterfront Revitalization Program (WRP) will be prepared.
- Describe conditions on the Development Site absent the Proposed Development (the No Action condition).
- Include a list of other projects expected to be built in the study area that would be completed before or concurrent with the Proposed Development, 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 actions and provide an assessment of the impacts of the proposed actions and project on land use and land use trends, zoning, and public policy. Consider the effects related to issues of compatibility with surrounding land use, consistency with zoning and other public policy initiatives, and the effect of the project on development trends and conditions in the area.

TASK 3: SOCIOECONOMIC CONDITIONS

The five principal 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 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.

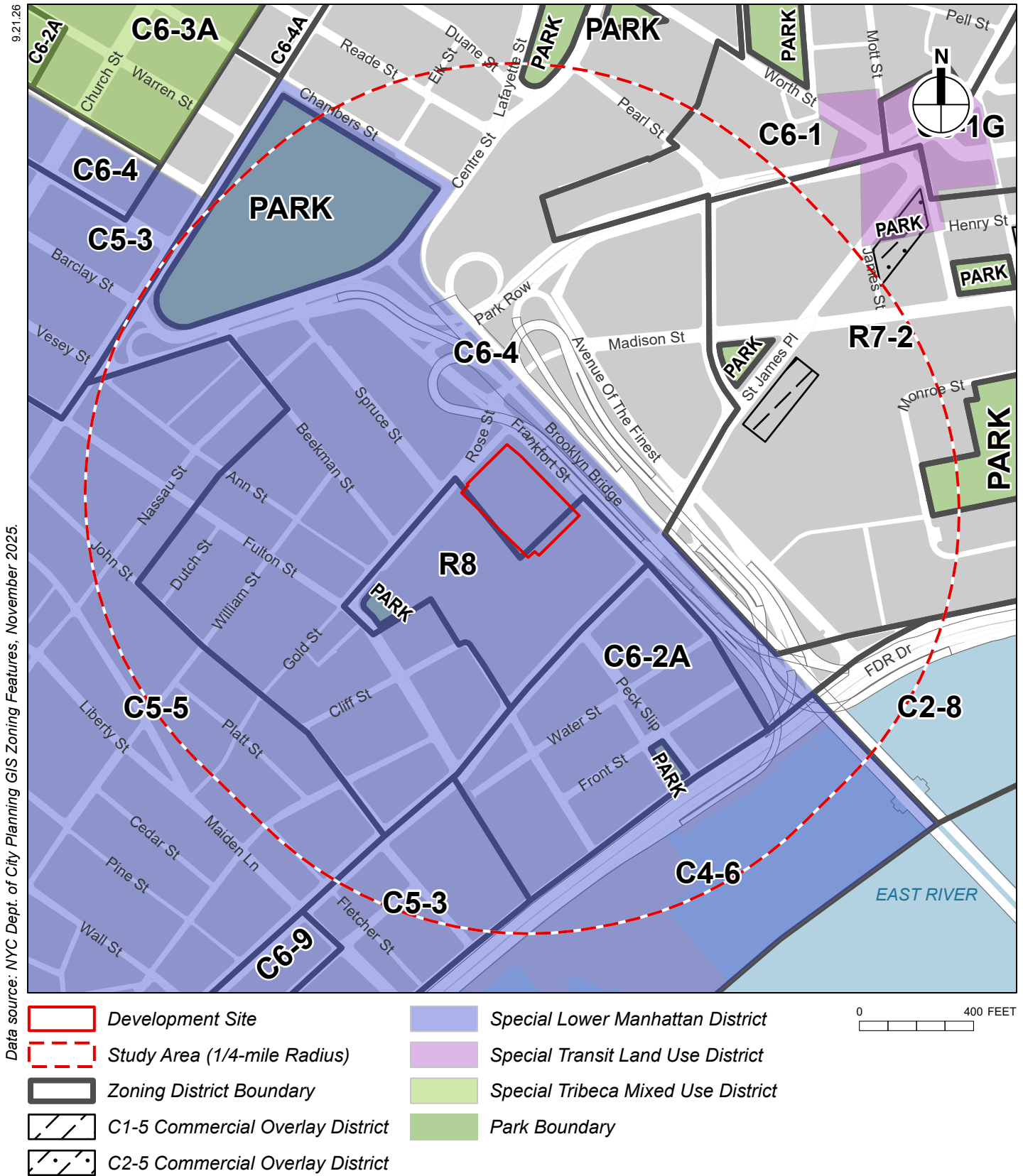
Direct Residential Displacement. The Development Site does not contain any residential uses. Therefore, the Proposed Development would not directly displace any residential uses, and an assessment of direct residential displacement is not warranted.

Direct Business Displacement. In order to facilitate the development of housing on this City-owned Development Site, the City released an RFP in March 2025. Under the Proposed Actions, the proceeds from the disposition of the site would be used to relocate the City Agencies currently occupying the Development Site. Additionally, the existing Older Adult Center would be temporarily relocated before returning to the Development Site after construction. As discussed above, there is a potential that the temporary relocation site for the Older Adult Center may become its new permanent location instead of returning to the Development Site in the Proposed Development; in either case the Older Adult Center would not be displaced. Given that the Proposed Actions were initiated by the City, the relocation of City agency and City-affiliated non-profit offices would not be considered "displacement" for analysis purpose as direct displacement is defined in the *CEQR Technical Manual* as being



Land Use Study Area

Figure 5



Zoning Study Area

Figure 6

“involuntary.” As such, consistent with *CEQR Technical Manual* guidance, this would not constitute direct displacement for analysis purposes and is not subject to analysis in the EIS.

Indirect Residential Displacement. Under the Proposed Development, approximately 4,000 DUs would be developed on the Development Site. Therefore, the 250-unit-threshold would be surpassed, and an indirect residential displacement assessment is warranted. The socioeconomic study area boundary will be dependent on the size of the area’s population in the future without the proposed actions, and the characteristics of the proposed development within the rezoning area, pursuant to Section 310 of Chapter 5 of the *CEQR Technical Manual*. A socioeconomic assessment seeks to assess the potential to change socioeconomic character relative to the study area population. The Proposed Development is expected to generate an increment of approximately 4,000 DUs on the Development Site. For projects or actions that result in an increase in population, the scale of the relative change is typically represented as a percent increase in population (i.e., a project that would result in a relatively large increase in population may be expected to affect a larger study area). The socioeconomic study area would increase the population within the ¼-mile radius by more than 5 percent compared to the expected No Action population; therefore, the larger ½-mile study area is appropriate. The study area is expected to comprise census tracts 7, 8, 13, 15.01, 15.02, 21, 25, 27, 29.01, 29.02, and 31.

The concern with respect to indirect residential displacement is whether a 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 Development 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 US 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 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 Development on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk.

Indirect Business Displacement. The Proposed Development would not introduce a substantial amount (i.e., in excess of 200,000 square feet) of new commercial uses as defined under CEQR. Therefore, a preliminary assessment of potential indirect business displacement is not warranted.

Adverse Effects on a Specific Industry. Based on the guidelines in the *CEQR Technical Manual*, a preliminary assessment of effects on specific industries is not warranted.

TASK 4: COMMUNITY FACILITIES AND SERVICES

The *CEQR Technical Manual* requires a detailed analysis of impacts on police and fire services and health care facilities if a proposed action would affect the physical operation of, or access to and from, a station house or health care facility, or where a proposed project would create a sizeable new neighborhood where none existed before. The Proposed Development would not meet any of these criteria as it would not directly affect those community facilities and would not create a sizeable new neighborhood. The Proposed

Actions would result in the relocation of the existing community facility on the Development Site, i.e., the NYC Aging-funded Older Adult Center, during project construction. The EIS will qualitatively describe community facility uses that are part of the Proposed Development.

It is possible that the project could trigger an analysis of potential indirect impacts to community facilities and services. According to the *CEQR Technical Manual*, an analysis is appropriate if there are:

- More than 2,392 DUs, requiring an analysis of public elementary/intermediate schools or 9,554 DUs for analysis of public high schools;
- More than 170 low- or low/moderate income residential units (for analysis of early childhood programs); or
- More than 1,033 residential units (for analysis of public libraries).

The Proposed Development is expected to result in approximately 4,000 DUs. Under MIH, 25 percent of these units, or 1,000 DUs, would be permanently affordable. Therefore, an analysis of public elementary/intermediate schools, early childhood programs, and public libraries will be undertaken following the guidance of the *CEQR Technical Manual*.

PUBLIC SCHOOLS

- In accordance with *CEQR Technical Manual* guidelines, the elementary and middle school analysis would be conducted at a sub-district level, and the high school analysis will be conducted at a borough-wide level. If an action introduces fewer than 100 elementary and middle school age children, or 150 high school students, an assessment of school facilities is not warranted. According to the *CEQR Technical Manual* guidelines, in New York City Community School District (CSD) 2, the 100-student threshold for analysis of elementary/middle school capacity is achieved if an action introduces approximately 2,392 DUs, respectively; the threshold for analysis of high school capacity is 9,554 DUs. As the project increment associated with the Proposed Development exceeds the CEQR analysis thresholds for elementary/middle school in CSD 2, a detailed analysis of schools is warranted.
- The primary study area for the analysis of elementary and intermediate schools should be the school districts' "sub-district" in which the project is located, pursuant to CEQR guidance. As the Development Site is located within CSD 2, Sub-district 1, the elementary and intermediate school analyses will be based on this sub-district.
- The analysis would be conducted pursuant to the guidelines in the *CEQR Technical Manual*. Existing public elementary and intermediate schools serving CSD 2, Sub-district 1 will be identified and located. Existing capacity, enrollment, and utilization data for all public elementary and intermediate schools within the affected sub-district will be provided for the current (or most recent) school year, noting any specific shortages of school capacity. 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 the sub-districts (for elementary and intermediate school analyses) 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 as per *CEQR Technical Manual* guidance. Plans to alter school capacity either through administrative actions on the part of the DOE, or as a result

of the construction of new school space prior to the 2038 analysis year, will also be identified and incorporated into the analyses. Planned new capacity projects from the DOE's 2025-2029 Five Year Capital Plan will not be included in the quantitative analysis unless the projects have commenced site preparation and/or construction. They may, however, be included in a qualitative discussion. The capacity of transportable classrooms, mini-schools, and annexes will not be included in the future conditions analysis.

- Future conditions with the Proposed Actions will be analyzed, adding students likely to be generated by the Proposed Development 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) for enrollment, capacity, and utilization in 2038.
- A determination of whether the Proposed Actions would result in significant adverse impacts to elementary and/or intermediate schools will be made. A significant adverse impact to elementary and intermediate schools may result, warranting consideration of mitigation, if the Proposed Actions would result in: (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) 100 or more new students generated from the Proposed Actions past the 100 percent utilization rate. If impacts are identified, mitigation will be developed in consultation with SCA and DOE. The number of school seats needed to mitigate any identified impacts, as well as the timing of the impacts, will be provided.

MEANS-TESTED EARLY CHILDHOOD PROGRAMS

- Existing publicly funded means-tested early childhood programs within approximately 1.5 miles of the Development Site will be identified. Each facility will be described in terms of its location, number of slots (capacity), enrollment, and utilization in consultation with DOE.
- For the No Action condition, information will be obtained for any changes planned for childcare 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 (see "Analysis Framework for Environmental Review"), 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 Proposed Actions will be assessed by comparing the estimated net demand over capacity to a net demand over capacity in the No Action condition. Although the Proposed Development is expected to add 1,000 income-restricted units pursuant to the City's MIH program compared to the No Action (based on 25 percent of incremental residential floor area), in accordance with CEQR guidance, the early childhood programs analysis will assume that 20 percent of the total housing units (approximately 800 units) would be targeted for households with incomes of 80 percent of AMI or below (which is used as a proxy for eligibility for early childhood programs).

- A determination of whether the Proposed Actions would result in significant adverse impacts to means-tested early childhood programs will be made. A significant adverse impact may result, warranting consideration of mitigation, if the Proposed Actions 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 5 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, in accordance with the *CEQR Technical Manual*.

LIBRARIES

- Local public library branches that serve the area within approximately $\frac{3}{4}$ mile of the Development Site, which is the distance that one might be expected to travel for such services, will be identified and presented on a map.
- Existing libraries within the study area and their respective information services and user populations will be described. Information regarding services provided by branches 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 New York 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 No Action conditions, projections of population change in the 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 Development 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 Development would increase a branch library's $\frac{3}{4}$ -mile study area population by 5 percent or more over No Action levels, and it is determined, in consultation with the New York Public Library, that this increase would impair the delivery of library services in the study area, a significant adverse impact may occur, warranting consideration of mitigation, in accordance with the *CEQR Technical Manual*.

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. As stated in **Table 1**, the Proposed Development would result in an increment of approximately 8,080 residents and approximately -2,180 workers. Therefore, a preliminary open space assessment will be prepared to determine the need for further analysis. 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 Development. For the indirect effects analysis, the new population generated by the Proposed Development is anticipated to exceed the 250 residential unit CEQR threshold 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 area.
- Create an inventory of publicly accessible open spaces within a ½ mile (residential study area) of the Development Site. This inventory will include examining these spaces for their facilities (active vs. passive use), condition (satisfactory or unsatisfactory), and utilization (crowded or not) (see **Figure 7**). Project conditions in the future without the Proposed Development, 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, if any are identified as part of the compilation of No Build projects under “Land Use, Zoning and Public Policy.”
- Assess impacts of the Proposed Development based on quantified ratios and qualitative factors. The assessment will account for any new public realm improvements expected to be created with the Proposed Development, including a quantitative assessment of the approximately 0.5-acre publicly accessible open space and a qualitative discussion of the approximately 18,000 sf of sidewalk widenings and other open areas that would be provided on the Development Site.

The analysis will include a preliminary assessment to determine the need for further analysis. If warranted, a detailed assessment will be conducted.

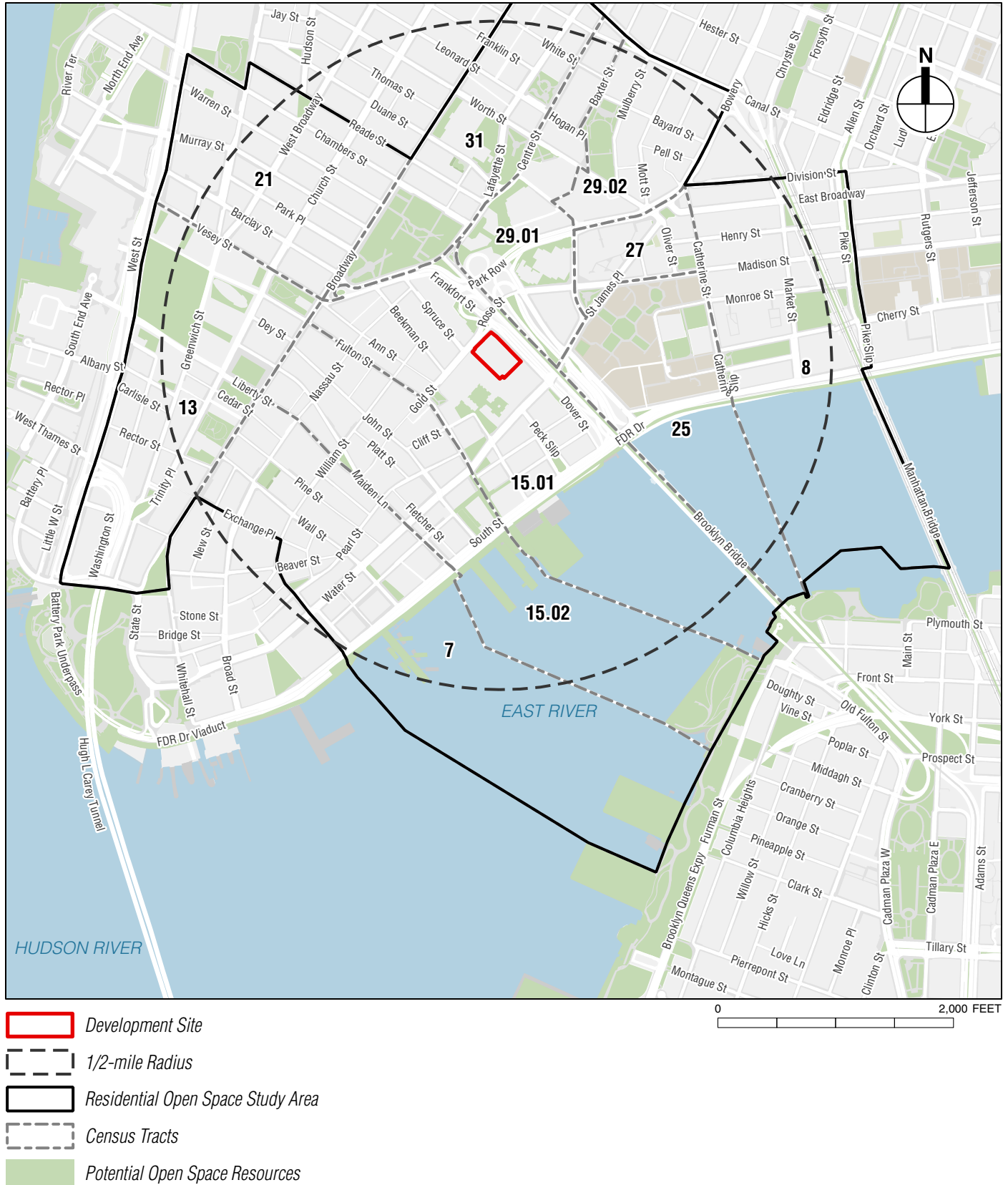
TASK 6: SHADOWS

The *CEQR Technical Manual* requires an analysis of potential shadow impacts for proposed actions that would result in new structures or additions that are 50 feet taller than in the No Action condition (or substantially different in bulk) and either 250 feet or more in maximum height, or adjacent to, or across the street from, a sunlight-sensitive resource, which includes publicly accessible parks and other open spaces, natural resources that depend on sunlight, and historic resources with sunlight-sensitive features. The Proposed Development would consist of two towers, the tallest of which would be approximately 1,290 feet tall (top of roof screen), and therefore a preliminary shadows screening will be conducted to assess whether project-generated shadows could potentially reach any sunlight-sensitive resources in the longest-shadow study area. The analysis would follow the tiered methodology described in the *CEQR Technical Manual*.

If the screening assessment shows that sunlight-sensitive resources could potentially be reached by project-generated shadows, a detailed shadows analysis will be conducted to assess the potential effects of the project-generated shadows. The analysis would follow the methodology for the detailed analysis described in the *CEQR Technical Manual*.

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



Open Space Study Area

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.

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if there is the potential to affect either archaeological or architectural resources. The analyses will consider the potential of the proposed action and associated RWCDs to affect historic and cultural resources as follows:

ARCHITECTURAL RESOURCES

The existing building on the Development Site will be reviewed in consultation with LPC to determine if it is eligible for NYCL designation or S/NR listing. The Brooklyn Bridge, which is S/NR listed and is a NYCL and National Historic Landmark, is directly adjacent to the north of the Development Site. In addition, the S/NR-eligible One Pace Plaza/Pace University is located across Gold Street from the Development Site. Other known historic architectural resources may be located within the project study area, and it is possible that previously unidentified historic architectural resources (i.e., potential architectural resources) may be located within the study area.

Consistent with the *CEQR Technical Manual*, the historic and cultural resources assessment will include the following tasks:

- Select the study area for architectural resources. This scope of work assumes that the study area for architectural resources will be approximately 400 feet beyond the Development Site's boundaries.
- Submit the proposed action and associated RWCDs to LPC for their review and determination regarding the existing building on the Development Site.
- Map and briefly describe known and potential architectural resources in the study area. To determine whether there are any potential architectural resources that could be affected by the proposed action, 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 and online sources.
- Assess the potential significant adverse impacts of the proposed action on architectural resources, including visual and contextual changes as well as any direct physical impacts, on any known and potential architectural resources. Potential effects will be evaluated through a comparison of the No Action condition and the future with the proposed action.
- If applicable, develop measures to avoid, minimize, or mitigate any significant adverse impacts on historic architectural resources, in consultation with LPC.
- This scope of work assumes there will be no state or federal actions that require review by the New York State Office of Parks, Recreation and Historic Preservation (OPRHP).

ARCHAEOLOGICAL RESOURCES

As the Development Site has previously been disturbed, there will be consultation with LPC to see if any further evaluation of archaeological resources is needed. If LPC identifies the Development Site as archaeologically sensitive, a Phase 1A Archaeological Documentary Report would be prepared for the Development Site. The Phase 1A would include an

evaluation of archaeological resources on the site, documentation of site history, its development and use, and the potential to host significant archaeological resources. The EIS would summarize the results of the Phase 1A report, if required.

If the Development Site is identified as having archaeological potential in the Phase 1A report and LPC concurs, the effect of the Proposed Development on those resources would be evaluated to determine if a significant adverse impact would result due to the Proposed Development. If it is found that a significant adverse impact to archaeological resources would occur, LPC would be consulted on what, if any, mitigation measures may be available to address those impacts.

TASK 8: URBAN DESIGN AND VISUAL RESOURCES

The *CEQR Technical Manual* requires a preliminary analysis of urban design and visual resources for proposed actions that would result in new structures greater than 250 feet in height or project sites larger than 1.5 acre. A detailed analysis is then prepared if warranted based on the preliminary assessment. The Proposed Development would consist of two towers, the tallest of which would be approximately 1,290 feet tall (top of roof screen) and the Development Site is approximately 2 acres. Therefore, a preliminary 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. Additionally, views of the site from the Brooklyn waterfront, the Brooklyn Bridge, and other publicly accessible locations beyond a ¼-mile radius where the Proposed Development would be visible will be included in the analysis. The preliminary assessment will include a concise narrative of the existing area, the No Action condition, and the With Action condition. The urban design assessment will conservatively assess maximum building envelopes. The analysis will draw on information from field visits to the study area and will present photographs, zoning, and floor area calculations, building heights, project drawings and site plans, and view corridor assessments.

A detailed urban design and visual resources analysis would be prepared if warranted based on the findings of the preliminary assessment. The detailed analysis would describe the Proposed Development and the urban design and visual resources of the Development Site and surrounding area. The analysis would 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.

TASK 9: NATURAL RESOURCES

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. As indicated in the EAS, the Development Site is not located on, adjacent to, or in close proximity to any natural resources. As noted above under "Task 6: Shadows," the EIS Shadows chapter will assess the effects of incremental project shadows on natural resources. This potentially could include effects on natural resources such as the East River. Therefore, the Proposed Actions would not have the potential to result in any significant adverse natural resources impacts.

apart from the potential shadows effects on natural resources. However, for informational purposes and to provide information that may support findings in other technical analyses, a natural resources chapter will be provided in the EIS, which will summarize the results of the shadows as it relates to natural resources.

TASK 10: HAZARDOUS MATERIALS

This chapter will analyze the potential for significant hazardous material impacts from the Proposed Development. The hazardous materials chapter of the EIS will include a detailed site history and discussion of current environmental conditions at the Development Site. The objective of the hazardous materials assessment is to determine whether the Development Site may have been adversely affected by current or historical uses at or adjacent to the site. As development facilitated by the Proposed Actions would require excavation and/or other in-ground disturbance, this chapter of the EIS will examine the potential for impacts related to subsurface contamination, including an evaluation of the existing soil and groundwater conditions in areas that would be affected by the Proposed Action.

Prior to the initiation of a consultation process with the New York City Department of Environmental Protection (DEP) under this environmental review, as part of its due diligence the developer engaged Langan Environmental Services to conduct a Phase I Environmental Site Assessment (ESA) and Phase II Site Investigation Report for the Development Site, which were completed in February 2026. The 2026 Phase I ESA identified recognized environmental conditions (RECs), including historical uses such as a newspaper printing facility with paint storage, a machine shop, and several buildings associated with the manufacturing, processing, storage, and/or sale of animal hides/leather and straw, and a garage with one 550-gallon gasoline underground storage tank (UST) at the Development Site. The 2026 Phase II Site Investigation Report at the Development Site also identified two volatile organic compounds (VOC) (acetone and methyl ethyl ketone [MEK/2-butanone]), semivolatile organic compounds (SVOC), polychlorinated biphenyls (PCB), pesticides, and/or metals in soil at concentrations exceeding the New York State Department of Environmental Conservation (NYSDEC) Title 6 of NYCRR Part 375 Unrestricted Use (UU), Protection of Groundwater (PGW), and/or Restricted Use Restricted-Residential (RURR) Soil Cleanup Objectives (SCO). SVOCs and total and dissolved metals were detected in groundwater at concentrations exceeding the NYSDEC Technical and Operational Guidance Series (TOGS) 1.1.1 Ambient Water Quality Standards and Guidance Values for Class GA Water (SGV). These known soil and groundwater impacts are considered RECs.

DEP reviewed these Phase I and Phase II reports and provided comments to the lead agency. Reflecting that the reports were prepared prior to the environmental review process consultation, DEP noted that Phase II was not subject to its approval and characterized it as limited. Furthermore, DEP, based on its review of the environmental assessment reports, has recommended that an (E) Designation for hazardous materials be placed on the subject property pursuant to Section 11-15 of the ZR. The (E) Designation will ensure that appropriate testing and analysis will occur prior to construction start and that any required remedial measures and/or engineering controls will be identified to inform building design and the construction process. The Mayor's Office of Environmental Remediation (OER) will provide oversight on hazardous materials for the Development Site under the (E) Designation.

TASK 11: WATER AND SEWER INFRASTRUCTURE

The *CEQR Technical Manual* requires a sewer infrastructure analysis for projects in Manhattan that are served by the combined sewer system that exceed 1,000 DUs or 250,000 sf of non-residential (commercial, public facility and institution, and/or community facility) space. As the Proposed Development is expected to exceed the residential development threshold, an analysis of the wastewater and stormwater conveyance and treatment system serving the Development Site is required. The analysis will focus on how sanitary sewage and stormwater flows are managed at the Development Site. In addition, existing stormwater drainage and surfaces (pervious or impervious) on the Development Site will be described. The existing sewer system in the vicinity of the Development Site will be described based on records obtained from DEP, such as sewer network maps and drainage plans. The analysis will also take into account the DEP Unified Stormwater Rule (USWR) in relation to potential improvements to the Development Site.

An analysis of potential impacts will be provided, incorporating any infrastructure improvements planned as part of the Proposed Development. Sanitary sewage generation for the Proposed Development 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 Development Site. 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 Development will be determined. Any wastewater and stormwater best management practices to be included as part of the Proposed Development will be described.

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 1 million gallons per day [gpd]). The incremental water demand of the Proposed Development is estimated to be 1,173,571 gpd. Therefore, as the incremental demand as compared to the No Action condition is expected to exceed 1 million gpd, an assessment of the water supply infrastructure serving the Development Site 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 Development Site and existing stormwater drainage system and surfaces. It will provide a description of any changes to the Development Site's stormwater drainage systems, the Development Site's surface area, and the area's water supply and sewer system that can be expected in the No Action condition; and an analysis of potential impacts on water supply and sewer infrastructure that will incorporate any infrastructure improvements that are planned for the Development Site as part of the Proposed Development. The analysis will describe any planned stormwater management measures, as well as any other measures required to ensure consistency with the City's water quality goals.

TASK 12: SOLID WASTE AND SANITATION SERVICES

According to the *CEQR Technical Manual*, a solid waste assessment determines whether a project 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 (SWMP) or with State policy related to the City's integrated solid waste management system. If a project's generation of solid waste would not exceed 50

tons per week based on standard waste generation rates, it may be assumed that there would be sufficient public or private carting and transfer station capacity in the metropolitan area to absorb increment, and further analysis would not be required. The Proposed Development would induce a new development that would require sanitation services. Based on an estimate using Table 14-1 in the *CEQR Technical Manual*, the Proposed Development is expected to result in a net, i.e., incremental, increase of approximately 137,870 pounds (68.94 tons) per week of solid waste compared to the No Action condition. Therefore, an assessment of solid waste and sanitation services is warranted for the With Action condition. To conduct a conservative analysis, this chapter will provide an estimate of the incremental solid waste expected to be generated by the Proposed Development and assesses 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 Development Sites for existing conditions, the No Action Condition, and the With Action Condition.
- Describe existing solid waste pickup and carting practices and how these may shift due to the implementation of Proposed Actions.
- Assess the impacts of the Proposed Actions solid waste generation on the City's collection needs and disposal capacity. The Proposed Actions' consistency with the City's SWMP will be assessed.
- Any project feature that may minimize waste or enhance recycling beyond what is required by law will be identified and discussed in the EIS.
- Any aspects of the Proposed Development that may make recycling difficult, impede waste collection, or result in the generation of high levels of solid waste will be identified and discussed in the EIS.

TASK 13: ENERGY

All new structures requiring heating and cooling are subject to the New York State Energy Conservation Code, which reflects State and City energy policy. According to the *CEQR Technical Manual*, most actions resulting in new construction would result in incremental demand and are not anticipated to create significant adverse energy impacts unless the project would affect the transmission or generation of energy. Consequently, the Proposed Development would not require a detailed energy assessment. For CEQR purposes, an energy impact analysis focuses on an action's consumption of energy. An energy assessment will be prepared, which will include an estimate of the Proposed Development's energy consumption (including an estimate of the demand load on electricity, gas, and other energy sources) and an assessment of the potential effects of the Proposed Development on the available energy supply.

TASK 14: TRANSPORTATION

The transportation studies for the Proposed Development encompass five distinct analysis topics: traffic, transit (subway, bus, and ferry), pedestrians, street user safety, and parking. The *CEQR Technical Manual* states that quantified transportation analyses may be warranted if a Proposed Project could result in 50 or more vehicle trips, 50 or more Citywide Ferry Service trips, 200 or more subway or bus trips, and/or 200 or more pedestrian trips during a given peak hour (a "Level 1" screening). If these thresholds are exceeded, a "Level 2" screening,

involving detailed assignment of projected trips would be undertaken to either conclude detailed analyses are not warranted or identify the study areas for which quantified analyses of potential impacts would be prepared. As previously stated, this DSOW is based on the Proposed Development's RWCDs (see **Table 1**).

Trip estimates will be prepared using information provided by the project team; established metrics from standard sources, including the *CEQR Technical Manual*; U.S. census data; New York City Department of Transportation (NYC DOT) inputs; and previously approved studies. These estimates will be prepared for one future analysis year and summarized by peak hour, mode of travel, and person vs. vehicle trips. The trip estimates will also identify the number of peak hour "person trips" made by transit and the number of pedestrian trips traversing the area's pedestrian facilities. Screening assessments will be prepared for the four typical analysis peak hours (weekday AM, midday [MD], and PM, and Saturday midday/afternoon). The results of these screening assessments will be summarized in a Travel Demand Factors (TDF) memo for review, comments, and concurrence on impact analysis study areas.

Described below is the proposed scope of work for traffic, transit, pedestrians, street user safety, and parking. All analyses will be prepared for the existing, No Action, and With Action conditions. The scope of work is intended to provide reasonable worst-case analyses specific to each study time period and to address the potential impacts associated with the Proposed Development.

Detailed traffic analyses will be prepared for the weekday MD and Saturday midday/afternoon analysis peak hours, as warranted by *CEQR Technical Manual* guidance and in consultation with NYC DOT. In addition, detailed pedestrian analyses will be prepared for the weekday AM, midday, and PM, and Saturday midday/afternoon analysis peak hours, as warranted by *CEQR Technical Manual* guidance and in consultation with NYC DOT. For transit, detailed subway station analyses of fare control areas and vertical circulation elements will be prepared for the weekday AM and PM peak hours at subway station(s) generating 200 or more subway trips and detailed subway line haul conditions at subway lines in the peak direction generating 200 or more subway trips, also as warranted by *CEQR Technical Manual* guidance and in consultation with the Metropolitan Transportation Authority (MTA)/New York City Transit (NYCT). The Proposed Development is not expected to generate sufficient incremental bus or ferry trips to require detailed bus or ferry analyses.

TRAFFIC

The detailed traffic analysis will evaluate roadway operations at critical intersections in the vicinity of the Development Site where substantial project trip generation is expected. The traffic study area will be determined based on the guidelines presented in the *CEQR Technical Manual*, in consultation with the lead agency and NYC DOT, and will include those intersections projected to receive the greatest concentration of project generated traffic. Where impacts are identified, measures to mitigate those impacts to the extent practicable will be determined for consideration by the lead agency and NYC DOT.

TRANSIT

Pursuant to *CEQR Technical Manual* guidance and consultation with the lead agency and NYCT, an assessment of transit elements, such as subway fare control areas and vertical circulation elements at subway station(s) and subway lines exceeding screening thresholds will be prepared for the weekday AM and/or PM peak hours. Where impacts are identified, feasible mitigation measures will be explored in consultation with NYCT.

PEDESTRIANS

The pedestrian impact assessment is expected to entail the analysis of key pedestrian elements (sidewalks, corner reservoirs, and crosswalks) surrounding the Development Site. The pedestrian study area will be determined based on the guidelines presented in the *CEQR Technical Manual*, in consultation with the lead agency and NYC DOT, and will include those pedestrian elements projected to receive the greatest concentration of project generated foot traffic. Where impacts are identified, measures to mitigate those impacts to the extent practicable will be determined in consultation with the lead agency and NYC DOT.

STREET USER SAFETY

Crash data for the study area intersections and other nearby sensitive locations from the most recent three-year period will be obtained from NYC DOT. An inventory of nearby Vision Zero corridors and other areas sensitive to street safety will be investigated to further define the study area. Data at these locations will be analyzed to determine if they may be classified (per *CEQR Technical Manual* criteria) as high pedestrian/bike crash locations and whether trips and changes resulting from the Proposed Development could adversely affect street user safety at these locations. If any high crash locations are identified, feasible improvement measures will be explored and recommended for NYC DOT approval and implementation to alleviate potential safety issues.

PARKING

A parking demand projection will be prepared for the Proposed Development. An inventory of off-site parking resources (on- and off-street) within ¼ mile of the Development Site will be conducted; in the event the analysis determines there will be a parking shortfall within the ¼-mile area, the area should be extended to a ½ mile. The parking analysis will determine existing parking utilization levels and project future levels with and without the Proposed Development. The parking analysis will determine existing parking utilization levels and project future levels with and without the Proposed Project. If a parking shortfall is anticipated to occur with the Proposed Development within ¼ mile of the Development Site, it will be disclosed as a shortfall in the EIS but would not constitute a significant adverse impact in consideration of the ample transit and pedestrian mode options available for travel to and from the Development Site.

TASK 15: AIR QUALITY

The number of project-generated vehicle trips is not expected to exceed the *CEQR Technical Manual* carbon monoxide (CO) analysis screening threshold of 170 vehicles in the peak hour at an intersection. However, the projected number of vehicles may exceed the applicable fine particulate matter (PM_{2.5}) screening threshold in the *CEQR Technical Manual*. In the event these screening thresholds would be exceeded by the Proposed Development, a microscale analysis of CO and/or PM mobile source emissions at critical intersections will be necessary. The Proposed Development would introduce sensitive uses within 200 feet of the Brooklyn Bridge, which is an “atypical” roadway; therefore, the effects of CO and PM_{2.5} emissions from this roadway on the proposed uses will be analyzed, as recommended in the *CEQR Technical Manual*. The Proposed Development would not include any public or accessory motor vehicle parking. Therefore, no parking facility analysis is required.

On December 15, 2021, the New York City Council passed a bill, Local Law 154, that effectively bans the installation of most new natural gas and other fossil fuel-fired systems in

new buildings in New York City. The ban is being phased in for new buildings based on the number of stories and use type, all of which will be in effect by the end of 2027, i.e., before building permits would be filed for the Proposed Development. In addition, the proposed design 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 Development's heating and hot water needs, and thus no analysis of stationary source heating and hot water emissions from the Proposed Development will be required.

MOBILE SOURCES (AS WARRANTED)

- *Gather existing air quality data.* Collect and summarize existing ambient air quality data for the study area. Specifically, ambient air quality monitoring data published by NYSDEC will be compiled for the analysis of existing and future conditions.
- *Determine receptor locations for the microscale analysis.* Select critical intersection locations in the study area, and outside the study area, representing locations with the highest potential total and incremental pollution impacts, based on data obtained from the Proposed Development's traffic analysis. At each intersection, multiple receptor locations will be analyzed in accordance with CEQR guidelines.
- *Select dispersion model.* The refined U.S. Environmental Protection Agency (EPA) AERMOD model is proposed to predict the maximum change in CO and PM_{2.5} concentrations, consistent with current EPA modeling guidance.
- *Emission calculation methodology and "worst case" meteorological conditions.* Vehicular cruise and idle emissions for the dispersion modeling will be computed using EPA's MOVES5 model. Compute re-suspended road dust emission factors 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, maximum 24-hour PM₁₀ concentrations and maximum 24-hour and annual average PM_{2.5} concentrations for No Action and With Action conditions. Concentrations will be determined for up to four peak periods for CO. No field monitoring will be included as part of these analyses.
- An analysis of potential air quality effects on the Proposed Project from the elevated Brooklyn Bridge entrance exit ramps will be performed. EPA-approved air quality models, including MOVES, and AERMOD, will be used to assess the CO and PM levels at the Development Site from the traffic along the elevated portion of the bridge near the Proposed Development. Information regarding the traffic will be based on current studies regarding traffic volumes along the bridge or from recent NYC DOT data, and projections of traffic growth for the project Build year. Five years of recent meteorological data from the LaGuardia Airport NWS will be used with concurrent upper air data from Brookhaven, New York. Modeled pollutants concentrations will be compared with the National Ambient Air Quality Standards (NAAQS) to determine the impacts on the Proposed Development.
- *Evaluate results.* Future pollutant levels with and without the Proposed Development will be compared with the CO NAAQS, and the City's CO and PM_{2.5} *de minimis* guidance criteria, to determine the impacts of the Proposed Development.
- *Mitigation.* For locations where significant adverse air quality and/or traffic impacts are predicted, identify appropriate mitigation measures.

STATIONARY SOURCES

- *Industrial Source Analysis.* A review will be performed to determine if there are any processing or manufacturing facilities within 400 feet of the Development Site. A copy of the air permits for any identified facilities will be requested from DEP's Bureau of Environmental Compliance. A review of NYSDEC permits and registrations will also be performed to identify any federal or state-permitted facilities. If manufacturing or processing facilities are identified within 400 feet of the Development Site, an industrial stationary source air quality analysis, as detailed in the *CEQR Technical Manual*, will be performed. EPA's AERMOD refined dispersion model will be used to estimate the short-term and annual concentrations of critical pollutants at sensitive receptor locations. Predicted values will be compared with the short-term guideline concentrations (SGC) and annual guideline concentrations (AGC) reported in NYSDEC's DAR-1 AGC/SGC Tables guidance document to determine the potential for significant impacts.
- *Large and Major Sources Analysis.* Potential large and major sources of emissions within 1,000 feet of the Development Site will be evaluated, as described in the *CEQR Technical Manual*. If any sources are identified that require an analysis, this work would be performed using the EPA AERMOD dispersion model to estimate the potential impacts on the Development Site from nearby existing or proposed stationary sources. For this analysis, five years of meteorological data, consisting of surface data from LaGuardia Airport, and concurrent upper air data from Brookhaven, New York, will be used for the simulation modeling. Concentrations of the air contaminants of concern (e.g., PM, nitrogen dioxide [NO₂]) will be determined at ground level receptors as well as elevated receptors. Predicted values will be compared with NAAQS, and the City's PM_{2.5} *de minimis* criteria.

TASK 16: GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

According to the *CEQR Technical Manual*, a project conducting an EIS that proposes development of 350,000 sf or greater may warrant assessment of greenhouse gas (GHG) emissions. The Proposed Development is anticipated to result in development of more than 350,000 sf. Therefore, GHG emissions generated by the Proposed Development will be quantified during both the construction and operational phases. 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 (CO₂) 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. An assessment of the Proposed Development will be performed to show consistency with the established GHG reduction goals of the City under PlaNYC, OneNYC 2050, and the State under the Climate Leadership and Community Protection Act (CLCPA). Features of the 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 Development 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 project to make it more resilient to the potential effects climate change will be disclosed.

Since the Development Site is located outside of the current 100- or 500-year flood zone (beyond 300 feet to the nearest flood zone) and would remain outside either flood zone through the end of the century (2100s) or within the useful life of the building, the Proposed Development is unlikely to be impacted by future climate conditions from sea level rise. Additionally, the Development Site is not projected to experience stormwater flooding due to increased precipitation through 2050 under moderate conditions. Therefore, an assessment of the potential impacts of climate change on the Proposed Development (e.g., sea level rise, flooding, etc.) is not warranted. (As part of the WRP Consistency Assessment discussed above under “Land Use, Zoning, and Public Policy,” a flood risk assessment will be provided as the Development Site is located within the City’s Coastal Zone.)

The analysis will consist of the following tasks:

- Greenhouse Gas Emissions Evaluation: The project’s operational GHG emissions during will be quantitatively evaluated and will include:
 - Direct Emissions—Estimated GHG emissions from on-site fossil fuel combustion, if any, will be quantified. Emissions will be based on available project-specific information regarding the project’s expected fuel use, carbon intensity factors specified in the *CEQR Technical Manual*, or carbon intensity limits specified under the Rules of the City of New York where data is not available.
 - Indirect Emissions: GHG emissions from purchased electricity and/or district steam generated off-site and consumed on-site during the project’s operation will be estimated.
 - Indirect Mobile Source Emissions: GHG emissions from vehicle trips to and from the Development Site will be quantified using trip distances and vehicle emission factors provided in the *CEQR Technical Manual*.
 - Construction Emissions: GHG emissions from project construction and emissions associated with the extraction or production of construction materials will be qualitatively discussed. Opportunities for reducing GHG emissions associated with construction will be considered. Should a quantified assessment of construction GHG emissions be required by the lead agency, an analysis will be performed.
- GHG Emission Reduction Measures: Opportunities and operational measures to reduce the Proposed Development’s energy use and GHG emissions design features will be discussed and quantified to the extent that information is available.
- Policy Assessment: Consistency with the City and State’s GHG reduction goal will be assessed. While the City’s overall goal is to achieve a carbon neutral status by 2050, individual project consistency 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 project’s carbon footprint. Furthermore, the project’s emissions will be assessed to demonstrate consistency with the State’s GHG emission reduction strategies to achieve the statewide emission limits through policy recommendations as described in the Climate Action Council’s Final Scoping Plan.

- Climate Change Adaptation: Since the Development Site is unlikely to be impacted by future climate conditions from sea level rise or increased precipitation, the evaluation will focus on potential future interactions with project infrastructure and uses with projected increased temperatures.

TASK 17: NOISE

The *CEQR Technical Manual* requires that the noise study addresses whether the Proposed Development would result in a significant increase in noise levels (particularly at sensitive land uses such as residences), what level of building attenuation is necessary to provide acceptable interior noise levels within the Development Site, and the level of noise exposure at newly introduced open space.

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 Development, the level of building attenuation necessary to meet CEQR interior noise level requirements, and the level of noise exposure at newly introduced open space. 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. Other noise descriptors will be examined when appropriate.
- Select receptor locations. The receptor locations will represent existing and newly introduced noise-sensitive uses and will be located on or adjacent to the Development Site.
- Submit a memorandum describing noise data collection and analysis methodology for lead agency and DEP review and comment.
- Conduct 20-minute noise level measurements at five locations on or adjacent to the Development Site during the typical AM (7:00 AM to 9:00 AM), MD (12:00 PM to 2:00 PM), and PM (4:00 PM to 6:00 PM) peak periods, at approximately 5 feet above grade, except at one location, which will be conducted on the rooftop of the existing building on the Development Site with a clear line of sight to the Brooklyn Bridge roadways. 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 Development. At each of the receptor locations identified above, determine noise levels without and with the Proposed Development using existing noise levels, acoustical fundamentals, traffic analysis results, and mathematical models.
- 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 Development, 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. With Action noise levels will be compared to appropriate standards and guideline levels for the Development Site.

- Evaluate noise exposure at newly introduced public open spaces. The predicted level of noise exposure at public open space introduced by the Proposed Development will be compared to appropriate standards and guideline levels as well as noise exposure at other comparable open spaces around the City.

TASK 18: PUBLIC HEALTH

Drawing on other EIS analyses (i.e., air quality, noise, hazardous materials, and construction), this chapter, if necessary, will assess and summarize the Proposed Development'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 Development's likely effects on neighborhood character using the analysis of impacts presented in other pertinent EIS analyses (i.e., urban design and visual resources, historic and cultural resources, transportation, and noise). Neighborhood character is established by a number of factors, such as land use, zoning, and public policy; socioeconomic conditions; community facilities; open space; 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 proposed 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 Development Site.
- 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 Actions.
- Assess and summarize the proposed actions' effects on neighborhood character using the analysis of impacts as presented in other pertinent EIS sections (particularly socioeconomic conditions, community facilities; open space, urban design and visual resources, shadows, traffic, and noise).

If required based on the preliminary assessment, a detailed assessment of the Proposed Development's effects on neighborhood character will be prepared.

TASK 20: CONSTRUCTION

The Proposed Development would be constructed in a single phase, with a total anticipated construction duration of approximately 82 months and would include partial occupancy of the building before the completion of 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 caused by construction activities, including construction-generated traffic, 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.

Technical areas to be analyzed include:

- Transportation Systems. This assessment will consider the Proposed Development's anticipated effects on the surrounding roadways, transit services, pedestrian facilities, and parking during construction. If notable closure or narrowing of roadway and/or sidewalk space is anticipated, their potential effects during non-construction peak periods may also need to be assessed, if determined to be warranted by NYC DOT.
 - Level 1 Transportation Screening Analysis. Based on construction worker and truck projections for the Proposed Development, the peak period construction person and vehicle trips (Level 1 [Trip Generation] screening assessment) will be estimated to determine if the *CEQR Technical Manual* thresholds of 50 or more vehicle-trips and/or 200 or more transit/pedestrian trips during a given peak hour are expected to be exceeded. If the Level 1 screening assessment determines that the above thresholds would be exceeded, a Level 2 (Trip Assignment) screening assessment would be prepared as part of the construction analysis. Based on the results of the screening assessment, detailed construction analysis will be prepared as warranted and potential mitigation measures will be recommended to mitigate transportation impacts to the extent practicable. Trips generated by partial occupancy of the Proposed Development would be reflected in the construction assignments/analysis (if warranted).
- 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 CO, PM, and NO₂. The potential for significant impacts will be determined by a comparison of the model predicted concentrations to the 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 an assessment of the magnitude and duration of noise from the Proposed Development's construction activities based on the preliminary construction schedule and equipment estimates for individual construction stages. The analysis will also review the projected construction activity and equipment to determine the expected intensity, duration, and location of noise emissions relative to nearby sensitive locations. While construction would be continuous, move-in to the building may be staged, with some residents moving in before construction is finished. Therefore, the impacts of construction noise on these residents would also be analyzed. Appropriate recommendations will be made to

comply with DEP Rules for Citywide Construction Noise Mitigation and the New York City Noise Control Code. In addition, this section will identify any project-specific control measures required to further reduce construction noise.

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 structures 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: land use and neighborhood character, socioeconomic conditions, community facilities, open space, historic and cultural resources, and hazardous materials.

TASK 21: EFFECTS ON DISADVANTAGED COMMUNITIES

This chapter will assess whether the actions may cause or increase a disproportionate pollution burden. The Development Site is not located within a Disadvantaged Community, which is defined as “communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high-concentrations of low- and moderate- income households.” However, the Development Site is located within ½ mile of a Disadvantaged Community. Therefore, an assessment will be prepared to identify any potential adverse impacts on Disadvantaged Communities that could result from the Proposed Actions. The assessment will establish the study area (generally ½ 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

The purpose of an analysis of alternatives in an EIS is to examine reasonable and feasible options that avoid or reduce project-related significant adverse impacts, while achieving the goals and objectives of the Proposed Development. The alternatives are usually defined once the full extent of the Proposed Development’s impacts have been identified. However, the alternatives analyzed must include a No Action Alternative, as required by SEQR regulations. The chapter may likely include an alternative that reduces any significant adverse impacts identified in the EIS. If the Proposed Development results in unmitigated significant adverse impacts, the EIS will also include a No Unmitigated Impact Alternative. The Alternatives analyses will be qualitative, except where significant adverse impacts of the Proposed Development have been identified.

TASK 23: MITIGATION

Where significant adverse impacts have been identified in the analyses discussed above, measures will be described to mitigate those impacts to the greatest extent practicable. This chapter will describe the practicable measures that could mitigate those impacts. These

measures will be developed and coordinated with the responsible City and/or State 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 Development:

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 Development, 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 Development, its environmental impacts, measures to mitigate those impacts, and alternatives to the Proposed Development. *