New York City Industrial Development Agency
Board of Directors

Public Hearing Testimony Submissions
September 10, 2025

438-444 Eleventh Avenue Holdings, L.P

- In favor:
    1. Carl Wilson, Council Member, Manhattan 3rd District
    2. Brad Hoylman-Sigal, Manhattan Borough President
    3. Tony Simone, New York State Assemblyman, 75th Assembly District
    4. Robert J. Benfatto, President, Hudson Yards Hell's Kitchen Alliance
    5. David Meade, Executive Director, Building Skills NY
    6. Bishop Mitchell G. Taylor, Chief Executive Officer, Urban Upound
- In opposition:
    1. Layla Law-Gisiko, Democratic District Leader, 75th Assembly District
    2. Claire Park

THE COUNCIL
OF
THE CITY OF NEW YORK
CARL WILSON
COUNCIL MEMBER
3RD DISTRICT, MANHATTAN

DISTRICT OFFICE
224 WEST 30TH STREET, SUITE 1206
NEW YORK, NY 10001
TEL: 212-564-7757

LEGISLATIVE OFFICE
250 BROADWAY, SUITE 1776
NEW YORK, NY 10007
TEL: 212-788-6979

E-MAIL: district3@council.nyc.gov

August 26, 2026

Members of the Board
New York City Industrial Development Agency
c/o New York City Economic Development Corporation
One Liberty Plaza
165 Broadway
New York, NY 10006

Re: Support for Tishman Speyer's Application for 99 Hudson Boulevard

Dear Members of the Board:

As the Council Member for District 3, which includes Hell's Kitchen and Hudson Yards, I write in support of Tishman Speyer's application before the New York City Industrial Development Agency for 99 Hudson Boulevard.

The project would transform long-vacant lots into a 48-story, approximately 1.25 million-square-foot Class A office building with approximately 14,000 square feet of ground-floor retail. The all-electric building is also targeting LEED Gold certification.

My office has come to know Tishman Speyer as an active member of the community and a responsible steward. Through their work on The Spiral, its partnerships with community organizations, and its design and construction of a portion of Bella Abzug Park, the company has demonstrated a commitment to investing in Hudson Yards while strengthening the surrounding neighborhood and public realm.

99 Hudson Boulevard would build on that record by activating long-vacant sites, creating construction and building-service jobs, adding modern office space, and supporting nearby small businesses. Its ground-floor retail would bring additional activity to Hudson Boulevard, improve the pedestrian experience, and help better connect the Javits Center with Hell's Kitchen and the surrounding neighborhood.

I respectfully urge the Agency's Board to approve Tishman Speyer's application. Based on my experience working with the company, I believe Tishman Speyer has the local knowledge, community commitment, and long-term perspective to make 99 Hudson Boulevard a responsible addition to Hudson Yards and Manhattan's Far West Side.

Sincerely,

Carl Wilson
Council Member
3rd Council District, Manhattan

OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN
THE CITY OF NEW YORK

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Brad Hoylman-Sigal, Borough President

September 2, 2026

Members of the Board
New York City Industrial Development Agency
c/o New York City Economic Development Corporation
One Liberty Plaza
165 Broadway
New York, NY 10006

Re: Hudson Yards Commercial Construction Project straight-lease transaction application for 99 Hudson Boulevard (aka 438-444 Eleventh Avenue)

Dear Members of the Board:

I appreciate the opportunity to submit comments in support of the application by Tishman Speyer for financial assistance in connection with the 99 Hudson Boulevard development. The proposed development would transform long-vacant lots within the Hudson Yards Special District into a 48-story, approximately 1.25 million-square-foot Class-A office building, including approximately 14,000 square feet of retail to activate the ground floor.

This application is consistent with long-standing neighborhood economic development goals and land use regulations. As a commercial development in Hudson Yards, it is eligible for financial incentives that were established in NYCIDA's Uniform Tax Exemption Policy (UTEP) in 2006 and have been administered to numerous similar developments over the last 20 years.[1] Payments in lieu of taxes (PILOTs) resulting from these developments are essential for paying down the bonds used to finance the 7-train expansion and other public realm and infrastructure improvements that followed the 2005 approval of the Hudson Yards rezoning.

Moreover, this application is a positive sign for the future of Manhattan's commercial office market following the COVID-19 pandemic, and for the economic vitality of the city at large. The building would be all-electric, targets LEED Gold certification, and would provide Class-A office space for nearly 6,000 new jobs. The resulting influx of workers, supporting businesses, and visitors would help activate the Hudson

[1] 2006-Hudson-Yards-UTEP.pdf

Boulevard streetscape, strengthen connections to Bella Abzug Park and the Javits Center, and contribute to a bustling mixed-use neighborhood.

The applicant has demonstrated a commitment to the growth and success of Hudson Yards through their development of The Spiral at 60 Hudson Boulevard East and their contributions to the design and construction of Bella Abzug Park. I urge the IDA to support the 99 Hudson Boulevard application, which would build on those accomplishments and further establish Hudson Yards as a thriving mixed-use neighborhood on Manhattan's West Side.

Sincerely,

Brad Hoylman-Sigal

Brad Hoylman-Sigal
Manhattan Borough President

TONY SIMONE
75TH ASSEMBLY DISTRICT

NEW YORK STATE ASSEMBLY

214 WEST 29TH STREET, SUITE 1002, NEW YORK, NY 10001
212-807-7900
326 LEGISLATIVE OFFICE BUILDING, ALBANY, NY 12248
518-455-4941
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COMMITTEES
Labor
Economic Development, Job Creation, Commerce and Industry
Corporations, Authorities and Commissions
Environmental Conservation
Governmental Operations
Social Services
MEMBER
Black, Puerto Rican, Hispanic and Asian Legislative Caucus
Puerto Rican/Hispanic Task Force
Task Force on New Americans

August 24, 2026

Members of the Board
New York City Industrial Development Agency
c/o New York City Economic Development Corporation
One Liberty Plaza
165 Broadway
New York, NY 10006

Re: Support for Tishman Speyer's Application for 99 Hudson Boulevard

Dear Members of the Board:

As the Assemblymember for District 75, which includes Chelsea, Hell's Kitchen, and Midtown, I write in support of Tishman Speyer's application before the New York City Industrial Development Agency for 99 Hudson Boulevard. The project would transform long-vacant lots into a 48-story, approximately 1.25 million-square-foot Class A office building, including approximately 14,000 square feet of retail to activate the ground floor. The building is planned to be all-electric and is targeting LEED Gold certification.

The New York State Assembly considers legislation and state policy affecting economic development, labor, infrastructure, environmental protection, and the vitality of communities across New York. In representing this district, I work closely with residents, workers, small businesses, civic organizations, and major property owners on the issues shaping Manhattan's Far West Side. Through that work, I have come to know Tishman Speyer as an active member of the community and a responsible steward that takes local engagement seriously.

Tishman Speyer's record in Hudson Yards reflects that approach. The company delivered The Spiral, helped design and construct a portion of Bella Abzug Park, and has remained engaged with local stakeholders on public space, streets, construction coordination, and neighborhood quality of life. Those efforts demonstrate an understanding that a developer's responsibility extends beyond the boundaries of an individual building.

99 Hudson Boulevard offers an opportunity to transform long-vacant lots into a productive and welcoming part of Manhattan's Far West Side. The project can create good construction and permanent jobs, add modern office space, and support nearby small businesses. Its 14,000 square feet of ground-floor retail can activate Hudson Boulevard, improve the public realm, and help better connect the Javits Center to Hell's Kitchen and the surrounding neighborhood. The all-electric design and LEED Gold target are also consistent with the need for new development to support New York's climate goals.

I respectfully urge the Agency's Board to approve Tishman Speyer's application. As the project advances, I encourage continued attention to local hiring, worker safety, diverse contracting, construction mitigation, and open communication with neighborhood stakeholders. Based on my experience with Tishman Speyer, I believe the company has the community commitment and long-term perspective to deliver 99 Hudson Boulevard responsibly.

Sincerely,

Tony Simone
Assemblymember

Hudson Yards Hell's Kitchen Alliance
412 W 42nd Street, 3rd Floor
New York, NY 10036
212-239-1619

August 17, 2026

Members of the Board
New York City Industrial Development Agency
c/o New York City Economic Development Corporation
One Liberty Plaza
165 Broadway
New York, NY 10006

Re: Support for Tishman Speyer's Application for 99 Hudson Boulevard

Dear Members of the Board:

On behalf of the Hudson Yards Hell's Kitchen Alliance ("HYHK"), I write in support of Tishman Speyer's application before the New York City Industrial Development Agency for 99 Hudson Boulevard. The project would transform long-vacant lots into a 48-story, approximately 1.25 million-square-foot Class A office building, including approximately 14,000 square feet of retail to activate the ground floor. The building is planned to be all-electric and is targeting LEED Gold certification.

The Hudson Yards Hell's Kitchen Alliance is the not-for-profit business improvement district serving Hudson Yards and Hell's Kitchen. We provide supplemental sanitation, streetscape, horticultural, beautification, and small-business services, and we are NYC Parks' maintenance and operations partner for Bella Abzug Park. 99 Hudson Boulevard is located within our service area and will directly affect the streets, businesses, park users, residents, and workers we serve every day.

HYHK has a longstanding working relationship with Tishman Speyer as an active member of the district and a responsible steward. Tishman Speyer's work at Bella Abzug Park is especially significant to our organization. In connection with its Hudson Yards development at the Spiral, the company designed and constructed a portion of Block 4, helping advance the continuous public open-space system along Hudson Boulevard. HYHK helps care for and operate the park every day, we see firsthand how that investment supports neighborhood life and creates a welcoming setting for residents, workers, businesses, and visitors.

99 Hudson Boulevard is an important step in the future of Hudson Yards. Developing these long-vacant lots will fill a major gap along Hudson Boulevard, bring new employers and daily activity to the district, and support nearby restaurants and retailers. The project's 14,000 square feet of ground-floor retail can activate the sidewalk, improve the public realm, and help better connect the Javits Center to Hell's Kitchen and the broader neighborhood.

HYHK respectfully urges the Agency's Board to approve Tishman Speyer's application. Based on Tishman Speyer's work at The Spiral and Bella Abzug Park, and on its record as an active community member and responsible steward, we believe the company has the local relationships, operational capacity, and long-term orientation to make 99 Hudson Boulevard a defining and positive part of Hudson Yards' next chapter.

Sincerely,

Robert J. Benfatto, Jr.

Robert J. Benfatto
President
Hudson Yards Hell's Kitchen Alliance

BUILDING SKILLS NY

+

August 11, 2026

Members of the Board
New York City Industrial Development Agency
c/o New York City Economic Development Corporation
One Liberty Plaza
165 Broadway
New York, NY 10006

Re: Support for Tishman Speyer's Application for 99 Hudson Boulevard

Dear Members of the Board:

On behalf of Building Skills NY, I write in support of Tishman Speyer's application before the New York City Industrial Development Agency for 99 Hudson Boulevard. The project would transform long-vacant lots into a 48-story, approximately 1.25 million-square-foot Class A office building, including approximately 14,000 square feet of retail to activate the ground floor. The building is planned to be all-electric and is targeting LEED Gold certification.

Building Skills NY is a not-for-profit organization committed to helping New Yorkers enter and advance within the construction industry. We connect workers from underserved communities to advanced skills training and good-paying jobs and equip them with the tools they need to build thriving careers in the long term. We are dedicated to developing a skilled workforce in which local residents play an active role in shaping their communities.

Building Skills NY has a strong and productive relationship with Tishman Speyer, built through our important work together at 160 Van Cortlandt Park South ("160 VCPS") in the Bronx. At 160 VCPS, a fully affordable housing development, Building Skills NY is partnering with Tishman Speyer to support local hiring for construction jobs and connect Bronx residents to opportunities generated in their own community. Our work together is creating clearer pathways from local outreach and job readiness to employment for qualified residents. Tishman Speyer has treated workforce access as a meaningful part of the project's community impact and has worked collaboratively with us to translate that commitment into action.

Our direct experience at 160 VCPS informs our support for 99 Hudson Boulevard. By transforming long-vacant lots into an active office and retail development, the project can strengthen Manhattan's Far West Side, improve the public realm and connection between the Javits Center and the surrounding neighborhood, and create meaningful entry points into the trades and related construction careers.

Building Skills NY respectfully urges the Agency's Board to approve Tishman Speyer's application for the project. We know from our work together at 160 VCPS that Tishman Speyer values local partnerships and is committed to making development a source of tangible opportunity for the communities in which it builds.

Sincerely,

David Meade

David Meade
Executive Director
Building Skills NY

URBAN UPBOUND
tackling poverty, changing lives.

August 11, 2026

Members of the Board
New York City Industrial Development Agency
c/o New York City Economic Development Corporation
One Liberty Plaza
165 Broadway
New York, NY 10006

Re: Support for Tishman Speyer's Application for 99 Hudson Boulevard

Dear Members of the Board:

On behalf of Urban Upbound, I write in support of Tishman Speyer's application before the New York City Industrial Development Agency for 99 Hudson Boulevard. The project would transform long-vacant lots into a 48-story, approximately 1.25 million-square-foot Class A office building, including approximately 14,000 square feet of retail to activate the ground floor. The building is planned to be all-electric and is targeting LEED Gold certification.

Urban Upbound is a not-for-profit organization dedicated to breaking cycles of poverty in New York City public housing and other low-income neighborhoods. We provide integrated employment, financial empowerment, small-business, college-access, youth-development, and community services that help residents build economic security. Our relationship with Tishman Speyer reflects decades of shared commitment to connecting major investment with meaningful opportunity for local residents.

Our support is grounded in direct work with Tishman Speyer at Edgemere Commons in Far Rockaway, Queens. Urban Upbound is partnering with Tishman Speyer to support local hiring and connect Far Rockaway residents to construction opportunities created by this transformative, fully affordable mixed-use development. Together, we are working to ensure that neighborhood residents know about available jobs, are prepared to compete for them, and have pathways into employment and longer-term careers. Tishman Speyer's engagement with Urban Upbound and other local partners reflects a genuine commitment to community development and to ensuring that major investment creates opportunity for the people who live nearby.

We support 99 Hudson Boulevard because it can connect major investment to both economic mobility and neighborhood improvement on Manhattan's Far West Side. By putting long-vacant lots back into productive use, adding 14,000 square feet of ground-floor retail, and improving the public realm and the connection between the Javits Center and the surrounding neighborhood, the project can create value beyond the building itself. A project of this scale can also open pathways in construction, building operations, engineering, maintenance, security, administration, hospitality, and tenant services.

Urban Upbound respectfully urges the Agency's Board to approve Tishman Speyer's application. Our partnership at Edgemere Commons gives us confidence that Tishman Speyer understands the value of community-based partners and can make 99 Hudson Boulevard a source of opportunity well beyond the project site.

Sincerely,

Bishop Mitchell G. Taylor
Co-Founder and Chief Executive Officer
Urban Upbound

From: Layla Law-Gisiko
To: IDABuild_PublicHearings@edc.nyc
Subject: 438–444 Eleventh Avenue Holdings, L.P. / 99 Hudson Boulevard
Date: Thursday, September 10, 2026 10:16:08 AM

Written Comments on 438–444 Eleventh Avenue Holdings, L.P. / 99 Hudson Boulevard

Respectfully Submitted to the New York City Industrial Development Agency
Public Hearing — September 10, 2026

My name is Layla Law-Gisiko. I submit these comments regarding the proposed financial assistance for 438–444 Eleventh Avenue Holdings, L.P., an affiliate of Tishman Speyer, for the development of 99 Hudson Boulevard.

The materials before the public may require clarifying the relationship between this transaction and the financing of infrastructure at the Western Rail Yard.

The proposed NYCIDA resolution concerns a $2.686 billion, approximately 1.256-million-square-foot office project at 438–444 Eleventh Avenue and 550 West 37th Street. The resolution contemplates approximately $1.477 billion in financing and would grant the applicant real-property-tax abatements and mortgage-recording-tax exemptions. NYCIDA also proposes to make the formal finding that this financial assistance is “necessary to induce the Applicant to proceed with the Project.”

But Section 11 contains another provision that deserves particular scrutiny.

The proposed resolution states that NYCIDA “will assign to HYIC payments in lieu of real property taxes, and payments in lieu of mortgage recording taxes” generated by the project. Section 4 likewise authorizes PILOT mortgages and assignments securing those payments in favor of the Hudson Yards Infrastructure Corporation. The operative language appears plainly on page 20 of the agenda package.

That matters because HYIC is the same public financing entity that has been authorized to finance infrastructure for the Western Rail Yard.

In June 2025, the City Council adopted Resolution 960-2025, entitled “Approving the expenditure of payments in lieu of taxes to fund the development of infrastructure over the Western Rail Yards in support of the development of housing.”

The relationship between these transactions therefore requires disclosure.

99 Hudson Boulevard will generate PILOT and PILOMRT revenues that the proposed

NYCIDA resolution expressly assigns to HYIC. Separately, the City Council has authorized HYIC and its revenues to support borrowing for Western Rail Yard infrastructure, including the platform necessary for development over the rail yard.

Because last year, City Council Resolution 960 expressly authorized HYIC financing for the Western Rail Yard project, including the platform over the rail yard. It states that PILOTs from the Hudson Yards Financing District may be spent on Hudson Yards infrastructure projects, and the amended definition specifically includes "the building of a platform over the WRY."

Even more importantly, Resolution 960 states that HYIC "may determine that it is prudent to direct HYIC revenues to the WRY Project" and authorizes HYIC revenues to secure future borrowing for that project.

So before this Agency votes on September 15, the public deserves a very simple answer:

Will the PILOT or PILOMRT revenues generated by 99 Hudson Boulevard be available, pledged, projected, counted, or otherwise used in connection with financing the Western Rail Yard platform?

If the answer is no, please identify the legal or contractual restriction preventing their use.

If the answer is yes, or even potentially yes, then that relationship should be disclosed publicly before this transaction is approved.

This is a $2.686 billion private development receiving public financial assistance. The resulting payments are being assigned to a public financing corporation with authority to finance another multibillion-dollar development only blocks away.

The public deserves to know whether these two transactions are financially connected before either connection becomes irreversible.

This is especially important because the City Comptroller has reported that Related is seeking HYIC financing for a platform whose cost Related estimates at approximately $2 billion.

A public hearing cannot provide meaningful transparency if the public is shown the tax benefit on one side of the transaction but not told where the resulting PILOT revenue may ultimately go.

I respectfully ask the Agency to provide that answer, together with the relevant HYIC revenue projections, before the September 15 vote.

Thank you.

Layla Law-Gisiko

Democratic District Leader, AD 75 Part A

Good morning everyone. My name is Claire. I'm here today as a NYC taxpayer to urge you all to vote NO on these applications for "financial assistance," totaling almost $100 million in direct cash assistance by NYC taxpayers, to the multibillion-dollar companies of ArcLight Capital Partners and Tishman Speyer. NYC IDA's board of directors must vote NO on these projects because the companies do not demonstrate sufficient financial need for this amount of public money, nor will these projects recoup enough in money or other benefits for the public to waste flagrantly on million dollar tax exemptions like the ones requested.

Each project has received a new name under new LLCs to increase obscurity, so in an effort towards transparency, I will be referring to these projects, the battery storage facility at 18-01 20th Avenue in Astoria and the commercial office development at 438-44 Eleventh Avenue in Manhattan, an area commonly referred to as Hudson Yards, by the names of their corporate owners, ArcLight Capital Partners and Tishman Speyer, respectively.

The first application, for both a mortgage recording tax benefit of $2,095,812 and an additional sales tax exemption of $3,577,500, totaling $5,673,312 in direct cash from NYC taxpayers to ArcLight Capital Partners, must be rejected.

ArcLight Partners has significant investments in 97 energy infrastructure projects, the majority of which, to my count 79 of their projects, are fossil-fuel based projects - gas and petroleum. In other words, this company trades in direct opposition to NYC climate goals. As recently as five years ago, ArcLight Partners received significant pushback from local communities who successfully resisted the company's attempt to build a peaker power plant, which are some of the dirtiest, least efficient, and most expensive sources of energy, in Gowanus, an area of the city that still struggles with environmental contamination. An important and pertinent question to ask is, why is ArcLight Partners suddenly interested in building battery storage?

Because they stand to recoup 30 percent of ALL expenses related to this project. I'm not referring to the $5 million dollars in cash assistance they would receive from NYC taxpayers. ArcLight's project most likely qualifies for $45 million in subsidies per the Inflation Reduction Act, which has an investment tax credit for clean electricity projects, and specifically, battery storage. Battery storage was the only form of "renewable" or "green" energy infrastructure that made legislative cuts associated with the Big Beautiful Bill, which may explain why a company like ArcLight is now interested in getting two pieces of the public money pie to build this battery storage facility.

By receiving an additional subsidy from the city, ArcLight Capital Partners is double dipping into public money, and for what benefits to New Yorkers? For one full-time job, for one year, and they have no intention of hiring through state-approved labor programs. The company already reports otherwise employing contractors and vendors, whose labor practices and compensation cannot be guaranteed.

Finally, on this project, I would like to point out that Venetia Lannon has a conflict of interest and should not vote on this project. As per their application, the revenue from the battery storage will originate from a toll agreement through Con Edison. Voting is a potential violation of the City Charter and reportable to the city's Conflict of Interests Board.

Moving on to the application for $92,209,189 in financial assistance submitted by multi-billion dollar company Tishman Speyer. The issues with this application are numerous, from the company's rocky reputation as a landlord to their questionable record on paying wages, but I will try keep it brief and focus on their most outstanding claim: this building will bring 5,927 new jobs to the city, and therefore bring a whopping $582,903,105 to the city.

Unfortunately, this number is pure speculation. Tishman Speyer has no real ability to produce these jobs, because 5,900 of the 5,927 jobs they claim their building will create depends on whether or not they are able to rent office space. The vacancy rate on commercial office space in Manhattan hovers at 19%. The reality is that Tishman Speyer can only maximally guarantee that there will be some construction jobs related to the construction of this building, which, they further specify, will not be union jobs and therefore those workers are not guaranteed to receive healthcare, a living wage, least of all pension benefits, to doing the hard work of building a 48-story high building in Hudson Yards. Construction jobs additionally do not have longevity, by nature of the work.

So what jobs are we looking at that the company is actually planning on providing via this building? 27 FTEs, paid at $74.00 an hour. Back of the napkin math reveals that's $3,836,160 a year, not the $582 million they claim. And those 5,900 jobs? Many of the current tenants of Hudson Yards are not new to NYC. These companies -- KKR, L'Oreal, Warner Media, Wells Fargo, BlackRock - are fellow billion to trillion dollar companies with both employees and office space already in the city. In fact, it wasn't companies like Tishman Speyer who encouraged them to move to new Hudson Yards buildings when they were being built - it was the city, with additional tax exemptions on top of the ones they approved in building construction, spending more public money to achieve what? Most of these companies have also been laying off, not hiring, new employees. Also to note, Tishman Speyer cannot even rent out the offices until 2030, when they project the building will be completed, in which case NYC IDA, by approving this application, will have lost the city over $20 million before a single person steps foot in that building.

What does $100 million mean for the city? It is ten times the budget for services for unsheltered street homeless individuals. It is twice the yearly budget for recreation services throughout the city. It is almost the entire yearly budget for disease control for the whole city, and the yearly budget for the Brooklyn Public Library. It is hard earned money from our bus drivers, librarians, sanitation workers, our school crossing guards, who pay THEIR taxes paycheck by paycheck, just for NYC IDA to turn around and cut these companies that own their homes, that own more than twenty offices, that speculate and lobby to burn oil and gas in their neighborhoods, a nice fat check.

History shows that NYC IDA's board has always voted in favor of the rich. A report from the Independent Budget Office found that through the PILOT program, the program that Tishman Speyer is applying for, NYC IDA has lost 65% of potential revenue for the city. You all have an opportunity today to make a material change to the quality of life in this city, by rejecting these companies' requests for millions of dollars in money paid by honest taxpayers, who don't have the privilege of being wealthy enough to get tax exemptions of the magnitude that these companies are brazenly asking for.

Thank you.

New York City Industrial Development Agency
Board of Directors

Public Hearing Testimony Submissions
September 10, 2025

Lighthouse Luyster Creek I, LLC and Lighthouse Luyster Creek II, LLC

- In favor:
    1. Tiffany Cabán, Council Member, Queens 22nd District
    2. Donovan Richards Jr., Queens Borough President
- In opposition:
    1. Claire Park

DISTRICT OFFICE
30-83 31ST STREET
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THE COUNCIL
OF
THE CITY OF NEW YORK

TIFFANY CABÁN

COUNCIL MEMBER·22·DISTRICT·QUEENS

COMMITTEES

CRIMINAL JUSTICE
GENERAL WELFARE
MENTAL HEALTH, DISABILITIES, AND ADDICTIONS
PUBLIC SAFETY
WOMEN AND GENDER EQUITY

June 23rd, 2026

New York City Industrial Development Agency
Attention: Emily Marcus, Executive Director
One Liberty Plaza
New York, New York 10006

Re: Eastern Generation's New York City Industrial Development Agency Applications - Lighthouse Luyster Creek I, LLC and Lighthouse Luyster Creek II, LLC

Dear Ms. Marcus,

Eastern Generation, LLC, and Elevate Renewables F7, LLC, submitted Core Applications to the New York City Industrial Development Agency for two (2) co-located, utility scale battery energy storage projects named Lighthouse Luyster Creek to the I, LLC and Lighthouse Luyster Creek II, LLC (the "Projects").

The Projects will be developed at the Astoria Generating Station in Astoria, Queens. They are located in an M3 industrial zoned area, safely away from neighboring residential areas, and within NYISO "Zone J". This zone faces growing reliability shortfalls and generation deficiencies.

The Projects offer substantial environmental benefits consistent with the requirements of the NY Public Service Commission and Climate Leadership and the Community Protection Act. Located in a disadvantaged community, these "zero emitting" facilities will reduce reliance on fossil generation, directly lowering air pollutants. In addition to these environmental and energy benefits, the Projects will generate significant regional economic activity.

For these reasons, the Office of Council Member Tiffany Cabán supports the responsible advancement of battery energy storage infrastructure in New York City. We encourage continued consideration of projects that help improve reliability, lower costs, reduce pollution, and move the state toward its clean energy future.

Sincerely,

Council Member Tiffany Cabán
District 22, Queens

DONOVAN RICHARDS JR.
President

CITY OF NEW YORK
OFFICE OF THE
PRESIDENT OF THE BOROUGH OF QUEENS
120-55 QUEENS BOULEVARD
KEW GARDENS, NEW YORK 11424

718.286.3000
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info@queensbp.nyc.gov

March 24, 2026

New York City Industrial Development Agency
One Liberty Plaza,
165 Broadway
New York, NY 10006,

Re: Battery Energy Storage Projects at Astoria Generating Station

Dear Members of the Board of Directors of the New York City Industrial Development Agency

I understand that applications are being advanced for battery energy storage projects at the Astoria Generating Station site in Queens, proposed by Lighthouse Luyster Creek I, LLC and Lighthouse Luyster Creek II, LLC. I support the responsible development of projects like these, which provide substantial benefits for grid reliability, affordability, public health, and New York's clean-energy transition.

As New York continues to transition to a cleaner electric grid under the Climate Leadership and Community Protection Act (CLCPA), the responsible deployment of battery energy storage systems (BESS) will be essential to maintaining reliability while reducing pollution and controlling energy costs. Battery storage allows electricity produced at one time to be stored and used later, making it possible to deliver renewable energy when demand is highest, thus reducing reliance on older, more polluting power plants. Storage systems also help stabilize the grid and protect consumers from price volatility by charging when supply is abundant and electricity is cheaper, and discharging when demand is high. During extreme weather or periods of heavy demand, storage can provide localized backup power, keeping critical infrastructure online.

Projects located at existing power plant sites, like the Astoria Generating Station, are particularly important. Facilities in western Queens have historically operated as peaker plants, contributing to local air pollution and public health concerns, particularly in disadvantaged communities. Deploying battery storage at these sites reduces reliance on fossil-fuel generation, improves air quality, and advances the State's environmental justice goals while maintaining the reliability New York City requires.

In addition to reliability and environmental benefits, projects of this scale can generate meaningful economic activity. Large-scale energy storage construction can employ local firms and workers across engineering, construction, environmental consulting, transportation, and service sectors, while supporting prevailing-wage jobs, MWBE participation, and growth of New York's clean-energy workforce. Using programs like those offered by the New York City Industrial Development Agency can help finance these projects, modernize industrial sites, and accelerate deployment of zero-emission energy resources—all while bringing tangible benefits to local communities.

It’s also important to note that modern BESS facilities are designed and operated under some of the strictest safety codes in the nation. The New York State Fire Prevention and Building Codes Council recently issued updated safety guidelines for BESS deployment, reflecting the latest best practices in fire safety, system design, and emergency response. In support, six former FDNY leaders, including former Commissioner Thomas Von Essen, have affirmed that “battery energy storage can and should be safely integrated into our communities.” With new safety codes in place, BESS facilities can be responsibly and safely deployed, helping ensure a reliable, clean energy grid while minimizing environmental and public health impacts.

For these reasons, I support the responsible advancement of battery energy storage infrastructure in New York City and encourage continued consideration of projects like those being planned for the Astoria Generating Site in Queens that help improve reliability, lower costs, reduce pollution, and move the State toward its clean-energy future.

Thank you for your consideration and for your continued leadership on clean energy and sustainability issues affecting the residents of Queens and all New Yorkers.

Sincerely,

Donovan Richards Jr.
President
Borough of Queens

Good morning everyone. My name is Claire. I'm here today as a NYC taxpayer to urge you all to vote NO on these applications for "financial assistance," totaling almost $100 million in direct cash assistance by NYC taxpayers, to the multibillion-dollar companies of ArcLight Capital Partners and Tishman Speyer. NYC IDA's board of directors must vote NO on these projects because the companies do not demonstrate sufficient financial need for this amount of public money, nor will these projects recoup enough in money or other benefits for the public to waste flagrantly on million dollar tax exemptions like the ones requested.

Each project has received a new name under new LLCs to increase obscurity, so in an effort towards transparency, I will be referring to these projects, the battery storage facility at 18-01 20th Avenue in Astoria and the commercial office development at 438-44 Eleventh Avenue in Manhattan, an area commonly referred to as Hudson Yards, by the names of their corporate owners, ArcLight Capital Partners and Tishman Speyer, respectively.

The first application, for both a mortgage recording tax benefit of $2,095,812 and an additional sales tax exemption of $3,577,500, totaling $5,673,312 in direct cash from NYC taxpayers to ArcLight Capital Partners, must be rejected.

ArcLight Partners has significant investments in 97 energy infrastructure projects, the majority of which, to my count 79 of their projects, are fossil-fuel based projects - gas and petroleum. In other words, this company trades in direct opposition to NYC climate goals. As recently as five years ago, ArcLight Partners received significant pushback from local communities who successfully resisted the company's attempt to build a peaker power plant, which are some of the dirtiest, least efficient, and most expensive sources of energy, in Gowanus, an area of the city that still struggles with environmental contamination. An important and pertinent question to ask is, why is ArcLight Partners suddenly interested in building battery storage?

Because they stand to recoup 30 percent of ALL expenses related to this project. I'm not referring to the $5 million dollars in cash assistance they would receive from NYC taxpayers. ArcLight's project most likely qualifies for $45 million in subsidies per the Inflation Reduction Act, which has an investment tax credit for clean electricity projects, and specifically, battery storage. Battery storage was the only form of "renewable" or "green" energy infrastructure that made legislative cuts associated with the Big Beautiful Bill, which may explain why a company like ArcLight is now interested in getting two pieces of the public money pie to build this battery storage facility.

By receiving an additional subsidy from the city, ArcLight Capital Partners is double dipping into public money, and for what benefits to New Yorkers? For one full-time job, for one year, and they have no intention of hiring through state-approved labor programs. The company already reports otherwise employing contractors and vendors, whose labor practices and compensation cannot be guaranteed.

Finally, on this project, I would like to point out that Venetia Lannon has a conflict of interest and should not vote on this project. As per their application, the revenue from the battery storage will originate from a toll agreement through Con Edison. Voting is a potential violation of the City Charter and reportable to the city's Conflict of Interests Board.

Moving on to the application for $92,209,189 in financial assistance submitted by multi-billion dollar company Tishman Speyer. The issues with this application are numerous, from the company's rocky reputation as a landlord to their questionable record on paying wages, but I will try keep it brief and focus on their most outstanding claim: this building will bring 5,927 new jobs to the city, and therefore bring a whopping $582,903,105 to the city.

Unfortunately, this number is pure speculation. Tishman Speyer has no real ability to produce these jobs, because 5,900 of the 5,927 jobs they claim their building will create depends on whether or not they are able to rent office space. The vacancy rate on commercial office space in Manhattan hovers at 19%. The reality is that Tishman Speyer can only maximally guarantee that there will be some construction jobs related to the construction of this building, which, they further specify, will not be union jobs and therefore those workers are not guaranteed to receive healthcare, a living wage, least of all pension benefits, to doing the hard work of building a 48-story high building in Hudson Yards. Construction jobs additionally do not have longevity, by nature of the work.

So what jobs are we looking at that the company is actually planning on providing via this building? 27 FTEs, paid at $74.00 an hour. Back of the napkin math reveals that's $3,836,160 a year, not the $582 million they claim. And those 5,900 jobs? Many of the current tenants of Hudson Yards are not new to NYC. These companies -- KKR, L'Oreal, Warner Media, Wells Fargo, BlackRock - are fellow billion to trillion dollar companies with both employees and office space already in the city. In fact, it wasn't companies like Tishman Speyer who encouraged them to move to new Hudson Yards buildings when they were being built - it was the city, with additional tax exemptions on top of the ones they approved in building construction, spending more public money to achieve what? Most of these companies have also been laying off, not hiring, new employees. Also to note, Tishman Speyer cannot even rent out the offices until 2030, when they project the building will be completed, in which case NYC IDA, by approving this application, will have lost the city over $20 million before a single person steps foot in that building.

What does $100 million mean for the city? It is ten times the budget for services for unsheltered street homeless individuals. It is twice the yearly budget for recreation services throughout the city. It is almost the entire yearly budget for disease control for the whole city, and the yearly budget for the Brooklyn Public Library. It is hard earned money from our bus drivers, librarians, sanitation workers, our school crossing guards, who pay THEIR taxes paycheck by paycheck, just for NYC IDA to turn around and cut these companies that own their homes, that own more than twenty offices, that speculate and lobby to burn oil and gas in their neighborhoods, a nice fat check.

History shows that NYC IDA's board has always voted in favor of the rich. A report from the Independent Budget Office found that through the PILOT program, the program that Tishman Speyer is applying for, NYC IDA has lost 65% of potential revenue for the city. You all have an opportunity today to make a material change to the quality of life in this city, by rejecting these companies' requests for millions of dollars in money paid by honest taxpayers, who don't have the privilege of being wealthy enough to get tax exemptions of the magnitude that these companies are brazenly asking for.

Thank you.