

Preliminary Statement

The Columbia Street Waterfront Association (“CSWA”) is pleased to submit the enclosed comments on the Draft Scope of Work (“DSOW”) for the proposed Maritime and Mixed-Use Redevelopment Project (the “Project”) located on the site of the Brooklyn Marine Terminal (“BMT”) as described in the Vision Plan (“VP”). CSWA represents the residents of Columbia Street Waterfront (“CSW”) neighborhood, bounded by Atlantic Avenue to the north, the Brooklyn Queens Expressway (“BQE”) to the west, Hamilton Avenue to the south, and the boundary of the BMT to the west, and other stakeholders. Founded in 2025, the CSWA works to promote the health, vitality and character of the neighborhood, advocate for the interests of residents, businesses and others with a stake in the Columbia Street Waterfront community, and ensure the neighborhood’s seat at the table on decisions that affect our community.

CSW is the neighborhood most directly impacted by the Project, both during construction and after completion. The Project’s Container and Flex Terminal, BMT North, and a portion of the Atlantic Basin are immediately adjacent to CSW. These districts account for all of the port activities and the majority of the housing units in the Project. Further, because this project is located on one side by the water and another by Brooklyn Bridge Park, impacts of the Project like traffic and residential displacement patterns will be felt even more by CSW than they would if the project was surrounded by other neighborhoods that could absorb those impacts.

CSW’s comments are organized as follows. First, we provide a brief statement of the key neighborhood priorities, based on input gathered by CSW leadership from residents. Second, we comment on the DSOW’s general analytical framework, particularly its consideration of alternatives to the Project and the definition of the study area for each DSOW category. Third, we provide specific comments on elements of each relevant environmental category.

Neighborhood Priorities

General Principals: CSW requests that the FSOW (Final Statement of Work) and EIS process adopt and follow these principles.

- Disclose unavoidable adverse impacts clearly and describe required mitigation with specificity so that the community can hold the city and its partners accountable as the Project progresses.
- Practice full transparency with information about and plans for the project, so that impacted communities can meaningfully participate. This includes, but is not limited to the following:
 - Full public meetings in Red Hook, Carroll Gardens, CSW, and Cobble Hill on the EIS and other significant Project actions.

- o Allow public comments at least 120 days after these meetings.
- o Publish consolidated construction calendar identifying actions across agencies and overlapping projects (the Project, BQE activities, and the Red Hood Coastal Resiliency Project).
- o Provide plain-language summaries of technical findings and concepts, in the EIS and other Project documents and updates.

CSW Priority Issues: CSWA's community engagement has identified the following priority issues, which are addressed in more detail in the specific EIS categories below.

- **Evaluate Community Alternatives** to the Project, including port-only, phased construction, increased park, public space and resiliency infrastructure, affordable housing priority, and housing on covered BQE trench alternatives presented below.
- **Expand geographic study areas** in key categories such as Land Use, Zoning, and Public Policy; Socioeconomic Conditions; and Transportation. See Analysis Framework below.
- **Expand the time horizon** for relevant analyses to include Years 2050 and 2080 conditions using NYC Panel on Climate Change projections.
- **Require analysis to consider cumulative effects** of the Project's construction and as-completed in the context of current traffic congestion and related impacts of BQE diversion patterns, various future BQE scenarios, and the Red Hook Resiliency Project.
- **Require analysis of infrastructure (water, sewer, climate resiliency)** required to accommodate the Project's increase in residential and commercial activity and mitigation of these issues before the Project starts, and the potential of the site to meet environmental needs of the existing community.
- **Require detailed socioeconomic, land use, zoning, and public policy, and urban design analyses** given the scale of the project relative to CSW and other neighborhoods.
- **Require assessment of the variation in risk between residents in the affordable units vs. market-rate units included in the BMT Redevelopment Project Reasonable Worst-Case Development Scenario (RWCDS)** for the following study areas:

- 10. Hazardous Materials
- 11. Water and Sewer Infrastructure
- 12. Solid Waste and Sanitation Services
- 13. Energy
- 15. Air Quality
- 17. Noise

This assessment must take into account the following:

- o The diagram on page 7 of the DSOW which shows the location and maximum heights of the planned residential buildings;
- o The difference in population density between the smaller affordable units and the larger market rate units;

Note that EDC has never disclosed the total GSF (Gross Square Footage) for the

2,400 affordable units vs. the 3,600 market-rate units. Nor has EDC disclosed the average GSF for an affordable unit vs. a market rate unit. In order to properly study the environmental impact under multiple study areas, **this information must be disclosed and included in the assessment.**

- **Require a complete environmental impact comparison** between building the marginal pier set forth in the BMT Vision Plan with renovating the existing finger piers proposed by several of the Community Alternatives (see pp. 6-7). This effort should take into account any feedback on the marginal pier proposal from the New York State Department of Environmental Conservation (DEC), Army Corp of Engineers (USACE), U.S. Coast Guard (USCG) and other governmental agencies listed as approvers in the DSOW.
- **Require monitoring, public reporting, and mitigation of public health and environmental impacts** of Project construction and as-completed state.
- **Require opportunities for meaningful public engagement** in the remainder of the review process, including in person public meetings and adequate time for public comment.

1. Analysis Framework

Study Areas

Study Area	DSOW	CSWA Requested Change	Justification & Impact
2. Land Use, Zoning, and Public Policy	¼ mile radius from Project Area	To Tillary Street to the North, 3rd Avenue to the East, and 25th Street to the South.	Several major projects surround the BMT site, including the LICH redevelopment, Red Hook Coastal Resiliency, BQE reconstruction, Gowanus rezoning, and the Brooklyn Borough-Based Jail. This study area must be expanded to include the cross-impacts of these projects.

Study Area	DSOW	CSWA Requested Change	Justification & Impact
3. Socioeconomic Conditions	½ mile radius from Project Area	1-mile study area (east to Third Ave)	Impact of business and resident displacement as a result of rising rents needs to be studied across the impacted communities (CSWD, Cobble Hill, Boerum Hill, Carroll Gardens, Red Hook.
4. Community Facilities	½ mile radius from Project Area		
5. Open Space	½-mile radius from Project Area		
6. Shadows	Within shadow reach from proposed buildings		
7. Historic and Cultural Resources	400-foot radius for built resources; Site-specific for archaeological	To Hicks Street to the East	Need to assess buildings which housed cultural landmarks such as the Puerto Rican Waterfront Center (Northeast corner of Columbia and Union). Tiffany Place is the only Belgian block street north of Hamilton.
8. Urban Design and Visual Resources	Project Area and immediate surroundings (1/4-mile)		
9. Natural Resources	Project Area and adjacent water bodies	To 3rd Avenue to the East, and to the coast of Red Hook to the South	Limited resiliency build for BMT needs
10. Hazardous Materials	Project Area and any off-site areas of concern		

Study Area	DSOW	CSWA Requested Change	Justification & Impact
11. Water and Sewer Infrastructure	Project Area and connections to city systems	½ mile radius	Water and Sewer Infrastructure is under pressure throughout CSW and Red Hook today
12. Solid Waste and Sanitation Services	Project Area	½ mile radius	Same rationale as for 11.
13. Energy	Project Area	½ mile radius	Several buildings in the surrounding area suffered major power disruptions this past summer.
14. Transportation	½-mile radius for transit; broader for traffic modeling	To Tillary Street to the North, 3rd Avenue to the East, and 25th Street to the South.	The BMT project in combination with the BQE repair will impact traffic to a broad extent
15. Air Quality	¼-mile radius for localized impacts; broader modeling for mobile sources	½ mile radius	Dust from the concrete recycling facility on Columbia Street blew across the BQE to Henry St and beyond.
16. Greenhouse Gas Emissions	Project Area and broader modeling		
17. Noise	½-mile radius from Project Area		
18. Public Health	½-mile radius from Project Area and as warranted by other analyses		
19. Construction Impacts	Project Area and adjacent streets	At least East to BQE	Vibrations from concrete recycling facility trucking affected buildings beyond the adjacent streets.

Study Area	DSOW	CSWA Requested Change	Justification & Impact
21. Alternatives	Same as full Project Area	Alternatives should be assessed against the BMT Redevelopment Project Reasonable Worst-Case Development Scenario (RWCDS) for each Study Area and cover the same geographic areas as requested above.	A meaningful comparison of the environmental impact of the RWCDS to the Community Alternatives below requires the assessments be conducted for each study consistently.

Community Alternatives

The FSOW should develop and evaluate several alternatives that reflect community feedback provided throughout the BMT planning process (“Community Alternatives”). In particular, CSWA believes that the following alternatives should be added to the FSOW, full- developed, and fully-considered in the EIS process. The fact that CSWA lists these to be included in the EIS process as alternative plans does not mean that CSWA considers any of these plans as a plan the community prefers the City follow for the site’s redevelopment. During the BMT Task Force process, the Columbia Street Waterfront community did not have a representative on the Task Force and did not have the opportunity to consider and recommend other plans which would meet the most important needs of residents and local businesses. CSWA intends to foster robust community education and dialogue about alternatives and build community consensus on suitable plans. For the purposes of the EIS process, CSWA believes evaluating the Vision Plan against a “No Action” scenario is not useful. No one expects or wants to leave the Site as is. Comparing the Vision Plan’s impact against a variety of alternatives will yield much more useful environmental impact comparisons. These alternatives - and potentially others - should be considered No Unmitigated Impact Alternative under the CEQR Technical Manual (Ch. 24, Sec. 180).

A. Port-Only Alternative

CEQR Technical Manual, Ch. 24, Sec. 140 (Alternative Design or Configuration)

The Lead Agency has stated that it will evaluate a project that includes only port uses, focusing on developing the port as maritime and logistics hub. This use is consistent with the site’s history, the City’s Blue Highways plan, and the sentiment of some community stakeholders. There are several port-only plans publicly available which can be used for the EIS analysis:

- Tom Fox, of the City Club of New York, developed the [Creating a Blue Highway Hub at Brooklyn Marine Terminal](#) plan.
- Jim Tampakis, a member of the original BMT Task Force, has a [plan](#) detailed in a Red Hook Star-Review article.
- [BMT Community Energy Network Plan](#) released by Resilient Red Hook and the NYC 2030 District
- Social Life Project's [Creating The City Of The Future: How an Improved Brooklyn Waterfront Can Spearhead a Thriving New Era for NYC and the Region.](#)
- [PortSide's RFEI response outlines a variation on the port proposal of the Vision Plan.](#)
- [NYU Wagner's report](#) on revitalizing the South Brooklyn waterfront includes BMT Port reconfiguration proposals.
- [Pratt's Imaging Alternative Futures for the Brooklyn Marine Terminal](#) includes several port-first proposals.
- Prologis proposal from RFEI Response. Prologis was the only one of the six Port Operator respondents to propose a significantly different Port configuration. Prologis has voluntarily shared their complete response.
- Dave Lutz, former Executive Director, NYC Neighborhood Open Space Coalition, has drafted “A Port & Park Plan for the Red Hook Waterfront” which depicts “transformation of the waterfront to something that serves maritime uses, but is also a place for people to gather and celebrate city life”.

B. Phased Construction

CEQR Technical Manual, Ch. 24, Sec. 170 (Phasing Alternative)

The Lead Agency should also model a project that progresses in phases. This approach would achieve two important goals: (a) spreading out the impacts of the project over a longer time horizon; and (b) allowing the project to change in response to both market conditions and actual impact of the work completed to date. Early Project stages should include, among other activities, community-serving assets (e.g., greenspace, infrastructure upgrades, traffic mitigation) and the affordable portion of the housing development.

This phased construction analysis should include a comparison of the economic impact of (1) completing the renovation of the port before constructing housing, and (2) constructing housing at the same time as the port reconstruction. The latter scenario (which EDC includes in its Project Phasing section of the BMT Vision Plan) must take into account the loss of existing port operations now located where housing will be built which under (2) can't be relocated to the renovated piers or new marginal pier.

C. Affordable Housing Priority Alternative

CEQR Technical Manual, Ch. 24, Sec. 130 (Alternative Size or Lesser Density) & 140 (Alternative Design or Configuration)

The Lead Agency should evaluate a balanced plan that refocuses the project on affordable housing while right-sizing the development activity to match the reality on the ground in adjacent neighborhoods, particularly CSW. This plan would retain the project's mix of residential, commercial, hotel, and port uses. But the residential portion of the project would be scaled back to 2,400, all-affordable housing units. Doing so would allow for residential building height and massing more in context with the existing surrounding neighborhood and minimize the potential impacts of the VP's large increase in population.

D. Housing on Covered BQE Trench

CEQR Technical Manual, Ch. 24, Sec. 150 (Alternative Site)

The Lead Agency should evaluate a plan to build all or a portion of the housing proposed in the Project on decking to be constructed over the BQE trench from Congress to Rapelye Streets. The covered BQE could also include green space and ground floor retail and commercial space. This alternative would reduce the concentration of new residential units along the East River, thus reducing massing and related impacts. It would have the added benefit of improving the health of surrounding neighborhoods impacted by air and noise pollution from the BQE.

BQE Central Project

The FSOW should specifically require analysis of the Project in light of the NYC DOT's BQE Central Project ("BQE Central"). BQE Central will amplify impacts of the Project on CSW and other communities, particularly in categories like Transportation, Air Quality, Greenhouse Gas Emissions, Noise, and Public Health. To address the complexities of the BQE Central and BMT coinciding, the Lead Agency should evaluate an alternate plan where the BQE Central work is completed first.

Timing of Infrastructure Investments and Mitigation Actions

Required mitigation efforts discussed below and determined during the EIS process should be implemented as soon as possible, and wherever practical, before the Project construction begins.

2. Land Use, Zoning, and Public Policy

DSOW	CSWA Requested Change	Justification & Impact
<i>“Describe the Proposed Approvals . . .”</i>	Prior to each Public Approval: (a) be at least 120 days should be provided for public comment; and (b) in-person public meetings should be held in each affected neighborhood.	BMT represents a significant change to current land use and the public should have an adequate opportunity to comment.
<i>“Describe conditions in the study area absent . . .”</i>	Describe the conditions of the study area under the Community Alternatives described above.	For the EIS to meaningfully evaluate the Community Alternatives, they should receive the same analysis as the VP and No-Action
<i>“Provide an assessment of the impacts of the Proposed Approvals and the Proposed Project . . .”</i>	Describe impacts of the Project on public policies to prevent residential and commercial displacement.	Assessment must include impacts of several major projects surrounding the BMT site, including the LICH redevelopment, Red Hook Coastal Resiliency, BQE reconstruction, Gowanus rezoning, and the Brooklyn Borough-Based Jail. The EIS must account for all their combined impacts and additional people, including overlapping schedules and effects on traffic, transit, and emergency response.

3. Socioeconomic Conditions

DSOW	CSWA Requested Change	Justification & Impact
Direct & Indirect Business Displacement; Adverse Effects on a Specific Industry		
<p><i>“Describe the operational characteristics of the businesses to be displaced . . . “</i></p>	<p>Ensure inclusion of industrial businesses, small businesses, and maker businesses.</p>	<p>These business types are important to the character and economy of impacted neighborhoods.</p>
	<p>Study the impact of the BMT Vision Plan’s omission of PortSide New York and for their flagship, the historic ship Mary A. Whalen.</p>	<p>The plan’s omission of Portside amounts to “direct displacement” of a community-serving nonprofit that has been in Red Hook for 20 years. PortSide provides workforce pathways, CTE internships, and volunteer opportunities for local youth and unions. Loss of PortSide would reduce maritime career access for historically excluded groups.</p>
Indirect Residential Displacement		
<p><i>Preliminary Analysis</i></p>	<p>CSWA believes that a detailed analysis of this topic is warranted because the Project could cause a trend toward increasing rents and new market-rate development.</p>	<p>Housing in CSW has remained relatively stable in recent years relative to the rest of the city and Brooklyn. New development has been isolated and limited.</p>
<p><i>“Step 3: Determine whether the study area has already experienced a readily observable trend toward increasing rents . . .”</i></p>	<p>Include analysis of increases in <u>home sale</u> prices and values, in addition to rent.</p>	<p>The community has a mix of owned and rented units at present. Potential impacts of homeownership affordability should be studied.</p>
<p><i>“Additionally, the BMT Vision Plan commits to completing a Racial Equity Report on Housing and Opportunity prior to GPP approval. . . “</i></p>	<p>A Racial Equity Report should be required as part of the EIS – rather than proceed on a non-binding basis via the VP.</p>	

DSOW	CSWA Requested Change	Justification & Impact
Adverse Effects on a Specific Industry		
<i>“Based on the guidelines in the CEQR Technical Manual, a preliminary assessment of effects on specific industries will be conducted to determine whether the Proposed Project could significantly affect business conditions in any industry or category of businesses within or outside the study area...”</i>	The Lead Agency should study the differing effects on the existing maritime business located at the site today by proceeding with the proposed marginal pier, replacing finger piers 8, 9A, and 9B, and renovating those piers.	Several respondents to the RFEI raised questions about negative impacts from (1) the material reduction in usable waterfront footage through replacing the finger piers with a marginal pier, and (2) simultaneously constructing the marginal pier and BMT North residential buildings (as is proposed on page 60 of the BMT Vision Plan), leaving current operations in the northern portion of the site with no clear place to relocate.

Mitigation

Binding anti-displacement mitigation measures are required. Such measures should utilize the full suite of City tools – including but not limited to, funded tenant organizing and legal services, Certificate of No-Harassment requirements, funding for emergency rental assistance, and City capital subsidy for affordable housing preservation.

4. Community Facilities & Services

DSOW	CSWA Requested Change	Justification & Impact
<i>Public Schools – Mitigation</i>	Mitigation should include new school seats added before, or at the same time, that new housing units are brought on line. A thorough assessment of the need for new schools, not just new school seats, must be performed.	Local schools must be prepared to accommodate new residents at the time they move into the neighborhood.
<i>Public Schools</i>	Study heat exposure at schools.	
<i>Fire Protection; Police Protection</i>	Model emergency response times and evaluate emergency access delays from construction detours/congestion.	Ingres and egress for CSW is challenged under current conditions due to traffic from BQE spillover and street pattern.

5. Open Space

DSOW	CSWA Requested Change	Justification & Impact
<i>Mitigation</i>	Mitigation should include developing required new green space before, or at the same time, that new housing units are brought on line.	Open spaces should be available for new residents at the time they move into the neighborhood.
<i>Qualitative Impact</i>	Evaluation should consider the quality of existing neighborhood open spaces when impacted by noise and air pollution as a result of the decade-long construction of the Project. Evaluation should compare RWCDS with alternative plans in how each treats waterfront open space as public health infrastructure through tree canopy, green infrastructure, active recreation, community third places, and safe walking and cycling access.	Current open spaces located close to already heavily-traveled roads (Columbia St., BQE), which will receive more traffic during and after Project construction. The community is already underserved in terms of public green space. Public health benefits include physical activity opportunities from sports fields, greenways etc. and mental health benefits that flow from adjacency to greenspace and "natural" areas.
	Incorporate heat exposure mitigation as core infrastructure.	
	Evaluate public-health co-benefits of open-space design (heat mitigation, cooling). This could include a cost benefit analysis of not spending on infrastructure for housing vs the minimal cost and health benefits of leaving the space green.	

6. Shadows

DSOW	CSWA Requested Change	Justification & Impact
<i>“Assess the significance of any shadow impacts on sunlight-sensitive resources . . .”</i>	Analyze shadow impacts from 30–40 story buildings along seven-block stretch.	Shadows from buildings with heights unprecedented in CSW must be assessed in terms of impacts on green space, animals, plants and people.

8. Urban Design and Visual Resources

DSOW	CSWA Requested Change	Justification & Impact
<i>“The analysis will describe the potential changes that could occur to urban design and visual resources . . .”</i>	Pay particular attention to the change in a pedestrian’s experience of the area in the presence of high-rise development.	Proposed inclusion of buildings above 15 stories are inconsistent with current neighborhood and will eliminate sightlines to, e.g., lower Manhattan and Brooklyn Heights.

9. Natural Resources

DSOW	CSWA Requested Change	Justification & Impact
<i>“The evaluation of the potential for the Proposed Project to adversely affect these resources will consider . . .”</i>	Analyze impacts of elevation changes on surrounding neighborhoods.	

10. Hazardous Materials

DSOW	CSWA Requested Change	Justification & Impact
<i>“the chapter will identify the binding mechanisms . . . including, where necessary . . . Remedial Action Plans and Construction Health and Safety Plans”</i>	These plans should be required and implemented. Progress towards their completion and findings should be communicated to the community in a timely and transparent manner.	The BMT site likely has significant hazardous materials from its legacy of port and industrial uses, which could be disturbed by the magnitude of the proposed project. Further, CSW has a recent history of being exposed to such hazards, like the DOT concrete recycling facility.

11. Water and Sewer Infrastructure

DSOW	CSWA Requested Change	Justification & Impact
<i>“The water and sewer infrastructure analysis will include a description of the existing water supply and sewer infrastructure . . .”</i>	Analysis should pay particular attention to historical challenges to sewer infrastructure in CSW neighborhood.	CSW has history of building collapse due to sewer infrastructure work.
<i>“An analysis of potential impacts will be provided . . .”</i>	Evaluate combined sewer overflow in (a) future climate scenarios, such as 2050 and 2080 models, and (b) cloudburst-level storms.	Location of Project and CSW adjacent to the East River makes it particularly susceptible to the impacts of climate change and sea level rise.

Mitigation

The SOW and EIS should consider the implementation of green infrastructure improvements to support adequate drainage and sewage systems. That green infrastructure should be sized appropriately for the change in the physical plan of the land in the Project and the increased residential and business population.

12. Solid Waste and Sanitation Services

No comment

13. Energy

DSOW	CSWA Requested Change	Justification & Impact
<i>“[The EIS] will discuss the potential effects of the Proposed Project on the available energy supply.”</i>	Evaluate the potential periodic flooding and sea level rise to energy resilience on the Project site and surrounding neighborhoods. Evaluate the difference in environmental impact of electrification requirements for proposed marginal pier vs. renovated finger piers 8, 9A, and 9B.	Coastal location of the Project and adjacent neighborhoods places energy infrastructure at risk of interruption.

14. Transportation

DSOW	CSWA Requested Change	Justification & Impact
<i>“The areas identified above will be subjected to a screening assessment. . .”</i>	Evaluation should include a much larger selection of geographies - to Tillary Street to the North, 3rd Avenue to the East, and 25th Street to the South, including but not limited to: Hicks, Henry, and Clinton Streets (North/South); and Union, Sackett, Kane, and Congress Streets (East/West).	These streets are already subject to significant traffic as a result of cars and large trucks seeking to avoid the BQE.
<i>“[The EIS] will assess potential impacts associated with trip increments that could occur as a result of the Proposed Project.”</i>	Evaluate traffic under active BQE, paused BQE, and BQE construction scenarios that overlap with Project construction and as-completed scenarios. This evaluation should include, among others, lane closures and detours, emergency response times, transit speeds, freight routing and truck enforcement, and school safety plans. It should also include an evaluation of the potential impacts of the closure of the northbound onramp to the BQE at Atlantic Avenue, which is something the DOT has been analyzing.	The Project is proceeding on a parallel timeline to some sort of action with regards the BQE. The current state of the BQE is already impacting CSW and there will certainly be interactions between Project impacts and BQE activities.
<i>“The findings of these assessments, along with relevant documentation and graphics, will then be summarized in the Transportation chapter of the EIS for review and concurrence by the lead agency and, potentially, involved expert agencies, such as NYCDOT or MTA.”</i>	The Lead Agency should commission an independent, third-party traffic and safety study to validate its findings, with the results published publicly.	

Mitigation

- Implement strong limitations on freight and truck traffic in the Project area, CSW, and other adjacent neighborhoods. Examples include: Enforceable truck route restrictions,

geofencing enforcement, time-of-day limits near schools, and utilization of Blue Highways freight alternatives to divert truck traffic. CSW and adjacent neighborhoods are already beset with significant truck traffic on residential and neighborhood commercial streets not designed to handle that type of transportation.

- Add strong traffic control measures on Columbia Street, at Summit and President Streets, such as stop signs or traffic lights.
- Implement traffic mitigation measures in CSW prior to the start of Project site preparation and construction.
- Add additional public transit measures to CSW and Project site, including enhancements to B61 route to significantly increase speed, return of B72 bus, adding direct bus service from Red Hook and southern CSW to Manhattan via the Battery Tunnel, adding shuttle service to Bergen, Carroll, and Smith-9th Street F/G subway stations, among others. These improvements should be added prior to the start of the Project site preparation and construction.

15. Air Quality

DSOW	CSWA Requested Change	Justification & Impact
Mobile Source – Intersection Analysis	Evaluation should study air quality under active BQE, paused BQE, and BQE construction scenarios that overlap with Project construction and as-completed scenarios. As-completed scenarios should account for: shipping-related truck traffic, maritime traffic, and personal and commercial traffic serving proposed new residential and commercial buildings. The air quality impact of potential port tenants such as Atlantic Salt Co Inc. (which responded to the RFEI) needs to be studied. The community has suffered from deleterious effects of salt blowing off piles managed by a former tenant, as well as silica dust from the DOT’s SIMS Concrete Recycling Facility, which operated from February 2024 through August 2025. Hazardous dust blew across the BQE to PS 29. Air quality monitoring should include Hamilton and Van Brunt, which is also the location of a Brooklyn Battery exhaust tower.	The Project is proceeding on a parallel timeline to some sort of action with regards the BQE, which will have traffic impacts on streets in the Project, CSW, and other neighborhoods.

DSOW	CSWA Requested Change	Justification & Impact
	Assess RWCDs and alternative plans in terms of establishing biodiverse and climate resilient landscaped buffers between industrial and residential areas to improve air quality.	As noted below, at least half Columbia Street Waterfront is designated a Disadvantaged Community. A significant driver is poor air quality as a result of the BQE trench.

Mitigation

- Install air quality monitors at key intersections in CSW and other neighborhoods, prior to Project start, and publish findings on a public website so that residents may monitor current, construction, and as-completed Project air quality levels. Current air quality monitoring and public reports should begin during the EIS process. Air quality should be measured continuously after construction. Air pollution as a result of increased maritime traffic is expected. The public should have access to the results. Relevant intersections should include:
 - o Congress and Columbia
 - o Kane and Columbia
 - o Degraw and Columbia
 - o President and Columbia

16. Greenhouse Gas Emissions and Climate Change

DSOW	CSWA Requested Change	Justification & Impact
<i>“The potential effects of climate change on the Proposed Project will be evaluated based on the best available information.”</i>	<ul style="list-style-type: none"> ● Analyze flood risks beyond the 2038 Build Year to consider flooding scenarios in 2050 and 2080. ● Analysis should include modeling of storm surges, extreme rainfall/cloudbursts, and hurricane scenarios. ● Analyze heat stress and extreme heat effects. ● Evaluate the reduction of greenhouse gas emissions in freight movement from enhanced port capacity that comes with an all maritime plan for the site 	All of the analysis in the categories below should fully incorporate the cumulative effects of a changing climate. We direct the Lead Agency to NYC Panel on Climate Change projections through 2100.

Climate Resilience

All of the analysis in other categories should fully incorporate the cumulative effects of a changing climate. We direct the Lead Agency to the NYC Panel on Climate Change projections, as well as the US Army Corp of Engineers NY & NJ Harbor & Tributaries Focus Area Feasibility Study:

- Analyze flood risks beyond the 2038 Build Year to consider flooding scenarios in 2050 and 2080.
- Analysis should include modeling of storm surges, extreme rainfall/cloudbursts, and hurricane scenarios.
- Analyze heat stress and extreme heat effects.
- Analysis should consider impacts on and potential conflicts with the City's Red Hook Coastal Resiliency Project
- Mitigation should be required where impacts are significant in the context of the future projected climate conditions.

17. Noise

DSOW	CSWA Requested Change	Justification & Impact
<p><i>“the noise analysis will examine the potential noise level increases resulting from changes in vehicular traffic associated with the Proposed Project,”</i></p>	<p>Evaluation should include:</p> <ul style="list-style-type: none"> ● Construction phase: traffic from construction vehicles, personal/commercial vehicles traveling through study area due to Project-related detours ● As-completed phase: traffic from personal/commercial vehicles on impacted streets; maritime traffic and related port operations activities. Noise pollution from working cargo piers <p>This evaluation should consider the overlapping impacts of current BQE overflow traffic and potential increased traffic in CSW due to future BQE conditions (e.g., continued deterioration, construction, closure). This evaluation should also include assessing the noise impact of possible port tenants such as SkyPorts, which in its RFEI response includes operations such as “Drone-enabled Blue Highways logistics to Hunts Point and Downtown Skyport.”</p> <p>The assessment should consider the noise-reducing effect of a landscaped buffer, as suggested in the City Club Blue Highway Hub Plan.</p> <p>Noise monitoring should include Hamilton and Van Brunt, which is also the location of the noisy entrance to the port.</p>	<p>CSW residents already deal with noise pollution from activities in the current configuration of the port. Road traffic passing through the neighborhood, including to/from the port, avoiding the BQE, and traveling from warehouses, also generates noise pollution. Residents also experience excessive honking during rush hour due to drivers “blocking the box” at intersections. In addition, helicopter traffic passing over CSW has increased considerably over the past few years.</p>

18. Public Health

We expect the Lead Agency to conform with the guidelines of the *CEQR Technical Manual*, which state that 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. We also expect the establishment of a Community Health & Safety Plan for remediation and build-out. Public health protections must be enforceable—not advisory.

19. Neighborhood Character

No comments.

20. Construction Impacts

DSOW	CSWA Requested Change	Justification & Impact
<p><i>“NOISE AND VIBRATION: 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.”</i></p>	<p>Extend vibration studies to all nearby buildings in the expanded study area, not just historic ones, to protect neighbors from property damage.</p>	<p>Columbia Street has a history of buildings collapsing due to large scale construction, including sewer line work.</p>
<p><i>“TRANSPORTATION SYSTEMS: This assessment will consider losses in lanes, sidewalks, off-street parking, and effects on other transportation services (i.e., transit and pedestrian circulation) during the construction periods and other relevant peak hours”</i></p>	<p>Model overlapping schedules among:</p> <ul style="list-style-type: none"> ◦ BQE Central ◦ Red Hook Coastal Resiliency ◦ BMT redevelopment <p>This includes evaluations of staging areas and conflicts.</p>	<p>These large-scale projects will take place simultaneously and their construction will impact overlapping transportation routes and services.</p>

Mitigation

- EIS should include enforceable mitigation triggers, such work stoppages, if air quality exceeds specified safe levels.
- Between the three projects listed above, a Cumulative Construction & Detour Management Plan (enforceable) is needed.
- Continuous air and noise monitoring pre- and during construction. • Public dashboard with real-time reporting.
- Enforceable mitigation triggers (including work stoppage thresholds). • Study:
 - Cancer and respiratory risk
 - Heat exposure
 - Flood-related health impacts
 - Cumulative construction burden

21. Effects on Disadvantaged Communities

DSOW	CSWA Requested Change	Justification & Impact
<p><i>“Section 8-0109(2)(k) of the New York State Environmental Conservation Law requires that an EIS includes a statement of the effects of the Proposed Approvals on disadvantaged communities, including whether the actions may cause or increase a disproportionate pollution burden.”</i></p>	<p>Include this statement in the BMT EIS and conduct the assessment described in this section</p>	<p>More than half of the Columbia Street Waterfront District is designated as a disadvantaged community (Disadvantaged Communities NYSERDA). CSW residents have suffered for generations from pollution rising up from the BQE trench, as well as pollutants from salt to silica dust blowing out from BMT tenants.</p>