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Council of the City of New York

Subcommittee on Zoning and Franchises

Testimony of Jamie Smarr, CEO NYC Housing Partnership

May 27, 2026

I am the President and CEO of the New York City Housing Partnership. I speak in support of Monitor Point on behalf of the NYC Housing Partnership. Our organization, founded by Mayor Edward Koch in 1983, has spent more than four decades working to expand access to middle class housing across New York City, representing over 100,000 affordable units created or preserved. I want to offer the Council members some perspective on what this project represents and why it deserves your unqualified approval.

The North Brooklyn waterfront has changed substantially over the past two decades. What was once an industrial corridor has become one of the most desirable stretches of real estate in the borough, and that transformation has come at a cost. The net rental vacancy rate in Brooklyn sits at about 1.27%, below the citywide average of 1.4%, and the families who built North Brooklyn to what it is today are increasingly unable to stay.

No one project can solve that problem on its own. But 460 permanently affordable homes, with units reaching as low as 40% AMI, is a meaningful contribution to true middle-class housing in an area that desperately needs it. What's more, the financing structure behind this project is the kind of creative, disciplined work that doesn't happen without genuine commitment from the development team and its public partners.

The cross-subsidy model — using market-rate units to finance deep affordability — is not new, but it is hard to execute well. It requires a developer with the relationships, the experience, and frankly, the willingness to structure a deal that prioritizes community benefit over maximum return. Gotham's record in East New

York, the Lower East Side, and elsewhere in this city demonstrates that they have done exactly that, repeatedly, in neighborhoods where it mattered.

Monitor Point represents the kind of project we should be supporting, not complicating. A waterfront site, transit-accessible, with deep affordability, environmental remediation, new public open space, and a long-term funding stream for the MTA — this is what thoughtful, public-minded development looks like.

I respectfully urge your support as this project moves through approval process.

Jamie A. Amare



Open New York Testimony before the New York City Council
Subcommittee on Zoning and Franchises RE Monitor Point and Dewitt Clinton
May 27, 2026

Good morning, I'm Jack Connors, City Legislative Manager at Open New York – a statewide, grassroots advocacy group that advocates for abundant homes and lower rents. Thank you Chair Louis and members of the committee for the opportunity to speak in support of land use items 67-77, Monitor Point and Dewitt Clinton. Combined, these projects would construct more than 2,100 new homes – 700 of them affordable.

In the seven years since talks around Monitor Point began our housing crisis has only worsened and New Yorkers have made it clear that they're tired of the financial stress our city's ever-increasing rents creates in their lives, tired of seeing friends, family, and neighbors displaced because of rising housing costs, and tired of being unable to see a future for themselves and their families in a city they love because it doesn't seem to love them back.

That's why this past November New Yorkers went to the polls in unprecedented numbers and said Yes to Affordable Housing. In a city where disagreement is a way of life, New Yorkers handed ballot questions two through five the highest yes vote of any odd year ballot proposition this millenium. The message is clear: voters want a lot more homes built, *quickly*.

Sites like Monitor Point and Dewitt Clinton are exactly the places we need to be building housing all across the city: close to transit, in a high-amenity area with good jobs, and on underutilized land that currently houses no housing and no greenspace. Further delay of Monitor Point will leave it walled off to the community, as it was for decades as a MTA Mobile Wash Unit depot, with no plan to move forward. In Chelsea, residents would have to wait for improvements to nearby green space.

I urge you to vote yes on these proposals: yes to housing, yes to greenspace, and yes to a city New Yorkers can afford. Thank you for the opportunity to testify today.

CONTACT: Jack Connors, City Legislative Manager | jack@opennewyork.org

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From: [Darren Lipman](#)
To: [Testimony](#)
Subject: [EXTERNAL] Monitor Point testimony - Hearing date 5/27/26
Date: Wednesday, May 27, 2026 4:03:01 PM

[REDACTED]

As a 27 year resident and North Brooklyn community boathouse member, I have witnessed the 2005 rezoning process from its begins to now

As a reminder, the rezoning was about increased height and population density in exchange for community benefits: waterfront access, affordable housing, and, most importantly, parks. Twenty-one years later, we still do not have the already developer-funded, city-promised Box Street Park. Lincoln, the community should not be held hostage by this project for an already agreed full park.

As much as I disagree with many aspects of this project, I am here to fight for what I believe community organizations truly needs: a boat ramp. One that is solely reserved for community organizations and volunteers who work on and support our waterways — from environmental remediation oversight, oyster repopulation, providing the public with human-powered boating opportunities, and arts performances. The closest usable motorboat ramp is around eight miles away. We cannot miss this opportunity, especially because this inlet is one of the few safe places to launch a boat.

Lincoln, the inlet belongs to the community. This luxury building will become an ugly wall against the community's park and, frankly, should not be built on public land. It will stand beside a park that exists only because of the incredible hard work of the community, and that park will be permanently blighted by this monstrosity.

I understand you are under intense pressure not to strike this project down, but the least you can do is secure a concession for a community organization boat ramp, a 1 million dollar donation to North Brooklyn Community Boat house, along with stiff penalties if the agreed-upon promises are not timely met.

NYC Council Hearing on Monitor Point Rezoning May 27, 2026

Good afternoon, my name is Kate Yourke

I have lived in Williamsburg for over 40 years, during which time I helped design and implement the process for Williamsburg and Greenpoint's 197a plans for the waterfront, fought garbage transfer stations to create a waterfront park, served on the steering committee for the coalition that stopped the power plant at Bushwick Inlet, and took on many battles for environmental justice, public education and affordable housing - working closely with many of the community organizations that support this Monitor Point project.

The 2005 rezoning's success in elevating Williamsburg real estate to an instrument of international investment has turbo-charged the luxurification of what was once a brownfield. The low-income community that remains was secured by our local non-profits years before developers were clamoring for property along the East River.

We worked to free this waterfront from the burden of noxious industry while disinvestment left us to serve the needs of our community with our own hard work.

Now that the area is swimming in investment dollars, we are expected to cheer this massive overdevelopment as the only route to affordable housing.

This leads me to the question;

How Many Luxury Towers will it take to Make Housing Affordable?

I am writing to express my profound disappointment that this unique and vulnerable parcel of publicly-owned waterfront could become 3 enormous luxury towers and a block of flashy retail. Gotham's presentation minimizes the scale of this development- it is massive, accelerating and exceeding the area's ongoing overdevelopment.

Bushwick Inlet is a shallow, partially dredged inlet on the East River in Brooklyn, where tides typically exceed 5 feet and currents normally reach 6 mph. The shoreline around the Inlet is a velocity zone, where wave action is subject to acceleration and attenuation during a storm. The intersection of these powerful, dynamic systems is where Gotham is proposing to build their massive development.

You have heard testimony to the many negative environmental, social and economic impacts of Gotham's design, so I will focus on this one piece, because I feel it is emblematic of the shallow and shortsighted solutions proposed to address problems with the Monitor Point proposal.

NYSDEC and The NYC Waterfront Revitalization Program directs shoreline design to promote ecological health and biodiversity through the use of natural, complex, sloped areas- avoiding vertical, hard surfaces like bulkheads and seawalls, because they are destructive to coastal ecosystems.

This vertical bulkhead will reflect and attenuate wave energy to increase erosion of neighboring shorelines~ like our long-sought, brand new, Bushwick Inlet Park.

The release of hazardous materials from the site and the impact to wildlife of this scale of construction will be devastating to this sensitive flood zone, as will the impacts resulting from 1,200 rental apartments and 30-50,000 square feet of retail and commercial space, including parking, deliveries, water runoff, garbage pickup, sewage treatment, etc. The Monitor Point development will destroy the character of this parcel of land and have a catastrophic impact on the surrounding environment, while further taxing the existing infrastructure of our neighborhood and putting its own residents at risk.

Supporters of this proposal cite the real need for affordable housing, but these tradeoffs are unacceptable. With public (MTA) ownership of a significant parcel, using the Monitor Museum's air rights, plus HPD subsidies, the destruction of Bushwick Inlet's fragile tidal habitat (and myriad other of its negative impacts) should be balanced by far more significant benefits.

Members of this community have planned for this parcel for decades, always with the intention that it would provide respite from first the noxious industrial use, then the obnoxious luxury use of our magnificent waterfront.

At a time when global warming is reaching a tipping point, it is absolutely unacceptable to maximize the scale of development on this fragile site in a known flood zone.

I implore you to reject this proposal.

Thank You

From: [Lauren Roper](#)
To: [Testimony](#)
Subject: [EXTERNAL] Monitor Point Testimony - Against
Date: Thursday, May 28, 2026 8:41:53 AM

Hello,

I was not able to meet during my testimony slot during the hearing yesterday. Please see below for my written testimony concerning the Monitor Point Rezoning.

Thank you.

Good morning,

My name is Lauren Roper and I am a resident of Greenpoint and I work as an Environmental Engineer in New York City. I am strongly against the Monitor Point construction project in Greenpoint.

When I first started working in NYC, many of my sites I was on were right here in Greenpoint along the East River waterfront. There were so many that we had to name them alphabetically to keep track, I parcel A, parcel B etc. Every one of those sites I worked on five years ago is now a high-rise luxury apartment building with just enough affordable housing percentage and the minimum environmental cleanup standards to give the private developer who built it a tax break. It is an open secret in the industry that these buildings go up as fast and cheaply as possible to leverage environmental remediation as a way to fund luxury housing projects. And now as a resident of Greenpoint, I see the massive impact these projects that I worked on have had to the neighborhood culture and the residents, many of whom have been forced to move out of the area due to cost of living.

Affordable housing is a huge issue in the city, and Greenpoint is sitting on top of the US's largest terrestrial oil spill, so the Brownfield Cleanup Program has operated effectively here for over ten years I think? But all we are seeing is the cost of living continuing to skyrocket. And its because these developers do not care about affordable housing, if they did they would choose one of the many sites in central greenpoint that are in need of remediation and many of which I have observed to be abandoned while biking around during the recent nice weather we have had.

They want this site because its prime waterfront real estate that they can change more rent for it.

I know this building does not have to be located right here, on the water, next to a unique and precious ecosystem this city does not normally have access to. It does not have to be in a flood zone that will only become increasingly more vulnerable due to climate change in the coming years. There are other locations that the museum could be. if not here.

I know this is state land. It should be used for the public good and for the community, and I don't believe in the concept that we have to sell out to private interests to support our neighbors. We have the opportunity here to provide a space that generations of New Yorkers can enjoy and which our children will be grateful to have preserved. The last thing they are going to need is a massive, rushed and poorly-built apartment complex that has water, heating and infrastructure issues like the other dozens we already have and hear about.

Are there any plans to crack down on these buildings which leave residents without basic needs for weeks at a time?

Are there any plans to increase public transit in this area if there are going to be thousands of more residents? This plan is irresponsible and by approving it you are putting private interest above public good.

Thank you
Lauren Roper

From: [Matt Meoni](#)
To: [Testimony](#)
Cc: [Save the Bushwick Inlet](#)
Subject: [EXTERNAL] Written Testimony for hearing on May 27, 2026 at 11:00am at the Subcommittee on Zoning and Franchises
Date: Tuesday, May 26, 2026 7:44:41 PM

WRITTEN TESTIMONY IN OPPOSITION

Monitor Point proposal

Submitted to: Subcommittee on Zoning and Franchises

Submitted by: Matthew Meoni - [REDACTED], Brooklyn, NY, 11211 -
[REDACTED]

I am a resident of North Williamsburg in Brooklyn, Community Board 1, I live about a 5 min walk from the proposed site and I submit this written testimony in strong opposition to the Monitor Point rezoning proposal at 40 Quay Street (the "Proposed Development" or "Monitor Point"). I urge you to vote NO on this application.

Gotham this whole time has bragged about their reputation and willingness to work with the community but every hearing I have been to they act the opposite. I was there during the Community Board hearings where Gotham was repeatedly condescending, misleading and gaslighting the community and community board members.

This testimony is organized around six independent grounds for denial, each of which standing alone would be sufficient to justify rejection. Together, they present an overwhelming case that Monitor Point is the wrong project, on the wrong land, at the wrong scale, developed through the wrong process.

The six grounds are:

- Violation of Borough President Reynoso's own 2025 Comprehensive Plan for Brooklyn across multiple policy pillars
- The unlawful or improper disposition of public land to a private developer without adequate public benefit

Failure to meet affordable housing standards appropriate to public land under City policy

- Gross open space deficits compounded by 20 years of broken promises to this community
- Serious and inadequately assessed climate, ecological, and flood risk impacts
- A fundamentally flawed, non-transparent public review process that has denied the community and decision-makers the visual information required for informed review

More than 5,300 residents have signed a petition demanding that this application be denied. This is not a fringe position. It represents the clear, documented will of the community this land was promised to serve.

II. Monitor Point Directly Contradicts Borough President Reynoso's 2025 Comprehensive Plan for Brooklyn

Borough President Reynoso released his 2025 Comprehensive Plan for Brooklyn — the largest borough-specific planning effort in the city's history — as an explicit guide for land use decisions. It is not merely aspirational. It is, by the Borough President's own description, a tool to inform his land use recommendations. Monitor Point fails this Plan on every major dimension.

A. Equitable Housing Distribution

The 2025 Comprehensive Plan is unambiguous: housing growth must be distributed equitably across Brooklyn's 59 community districts. The Plan identifies neighborhoods with low access to opportunity — Canarsie, Coney Island, Red Hook, and others — as the appropriate locations for density increases, because new housing in high-opportunity areas serves those least in need of mobility while doing nothing for those who need it most.

Community Board 1 — Greenpoint and Williamsburg — is among the highest-opportunity neighborhoods in all of Brooklyn. And it has already delivered. Between 2010 and 2020 alone, CB1 added 18,500 new housing units, more than any other community district in New York City. Over the last 14 years, more than 29,000 new units have been constructed here. The Borough President himself has noted this disparity publicly, stating that some districts contributed nothing while CB1 carried an enormous share of the city's housing burden.

The 2025 Comprehensive Plan explicitly calls for robust housing development to occur in

underperforming districts. Monitor Point does the opposite: it adds nearly 1,150 more units — the vast majority luxury — to the most overburdened district in the borough. This is not equitable growth. It is continued exploitation of a neighborhood that has already done its part, while neighborhoods that have contributed almost nothing continue to be shielded from growth.

Approving Monitor Point sends a clear and damaging policy signal: that the Comprehensive Plan's equity framework does not apply when a well-capitalized developer is standing in front of you.

B. Public Land Must Deliver 100% Affordable Housing

The 2025 Comprehensive Plan makes explicit that public land must serve the public good — and that when the City controls land, the standard for affordability must far exceed what the market provides voluntarily. This is not a radical position. It reflects a basic principle of public trust: land that belongs to the people should benefit the people.

The Monitor Point development site is public land. Lot 1, the primary development site, is owned by the New York City Transit Authority. Its disposition to Gotham Organization for private luxury development — even in exchange for a new MTA facility elsewhere — represents a transfer of public assets to private profit at a scale this community cannot absorb.

Furthermore, the affordability crisis in this neighborhood is not abstract. 79 Quay Street, directly across from the development site, is already listing apartments at \$13,500 per month. Monitor Point's luxury towers will accelerate this speculation, driving up Area Median Income calculations and making future "affordable" units in the neighborhood even less affordable to the people who need them. Ultra-luxury housing does not relieve housing pressure for the bottom 90% of earners. It concentrates wealth and displacement pressure at the same time.

Public land demands a public standard. On this site, that means 100% affordable housing — or no housing at all. Monitor Point delivers neither.

C. Open Space Equity and the Unfinished Promise of Bushwick Inlet Park

The 2025 Comprehensive Plan identifies open space equity as critical infrastructure — not a luxury — and flags Greenpoint-Williamsburg as severely deficient. The Borough President's own data shows CB1 has just 0.6 acres of open space per 1,000 residents. The citywide average is 1.8 acres. The standard required by the City's own City Environmental Quality Review (CEQR) process is 2.5 acres per 1,000 residents. This community sits at less than one quarter of what is required.

This deficiency exists precisely because of broken promises. Bushwick Inlet Park and Box

Street Park — 22 acres combined — were committed to this community over 20 years ago as part of the 2005 Greenpoint-Williamsburg Rezoning. Those commitments were made explicitly in exchange for the density increases the neighborhood absorbed in 2005. The community upheld its end of that bargain. The City has not.

Monitor Point would permanently foreclose the possibility of completing Bushwick Inlet Park on this site. The developer's claim that the project delivers 50,000 square feet of new open space is misleading on two levels. First, the Waterfront Public Access Area (WPAA) and Public Access Area (PAA) proposed are required by the local Waterfront Access Plan — they are zoning mandates, not voluntary contributions. Second, they consist primarily of hardscape: a street extension, an esplanade, a cul-de-sac turnaround. This is not a park. Parks have athletic fields, courts, lawns, gardens, and children's play areas. What Gotham is offering is a sidewalk with better landscaping.

By the City's own CEQR standards, Monitor Point's nearly 3,000 new residents would require approximately 300,000 square feet of new open space. The developer is providing roughly 50,000. That is a deficit of 250,000 square feet — created by this project, on this site, in the most park-starved community district in Brooklyn.

The 2025 Comprehensive Plan calls for open space investment as a matter of equity and public health. Approving Monitor Point is the antithesis of that commitment.

[D. Climate Resilience and Nature-Based Flood Defense](#)

The 2025 Comprehensive Plan places climate resilience at the center of Brooklyn's future planning framework. It explicitly calls for nature-based flood defenses, protection of soft shorelines, and investment in ecological infrastructure as essential tools for protecting neighborhoods from increasingly severe storm events. It cites Hunters Point Wetland, the Living Breakwaters project, and the Lower Manhattan Coastal Resilience Plan as models.

Bushwick Inlet is exactly the kind of irreplaceable ecological asset the Plan is designed to protect. It is one of the East River's last natural tidal estuaries — a rare embayment, a migratory bird corridor, and a living coastal buffer. More than 80% of marine life health depends on estuaries like Bushwick Inlet. The Inlet has been documented as a habitat for more than 80 species of birds. It represents one of the last undeveloped stretches of coastline in New York City and one of the last remaining marshlands in Brooklyn.

The 40 Quay Street property sits squarely inside both the 100-year and 500-year flood zones. Monitor Point's own Draft Environmental Impact Statement (DEIS) acknowledges this. Placing luxury residential towers — housing nearly 3,000 people — 50 feet from this shoreline does not demonstrate coastal resilience. It manufactures future disasters. It destroys the soft shoreline ecology that nature-based flood defenses depend on, and it places future residents directly in harm's way.

Protecting this public land in its natural state could provide flood protection for approximately 250 surrounding acres. Approving Monitor Point eliminates that possibility permanently and contradicts every principle the Borough President's own Comprehensive Plan stands for on climate.

III. The Public Review Process Has Been Fundamentally Compromised by Gotham's Deliberate Lack of Transparency

One of the most serious concerns with Monitor Point is not what is being proposed, but how the developer has conducted itself throughout the public review process. The pattern of behavior by Gotham Organization constitutes a fundamental failure of good-faith community engagement — and provides an independent basis for skepticism about every claim they have made.

A. The Community Board Was Denied Visual Information Required for Informed Review

At the Community Board 1 Land Use Committee meeting, the committee — which ultimately voted NO with conditions — specifically requested that Gotham provide architectural renderings of the proposed buildings in advance of the vote. This was not an unusual or unreasonable request. For a project of this scale — nearly 1.2 million gross square feet, towers rising 56 and 41 stories, on public land adjacent to a beloved park — clear visual representations of the finished buildings are the minimum required for any community member, committee member, or elected official to make an informed judgment.

Gotham was given weeks of advance notice to provide these materials. Their response was to submit thousands of pages of technical documentation — and claim that the community board could find renderings somewhere inside that document dump.

This is not compliance. This is obstruction dressed as compliance.

The Land Use Committee voted on one of the most consequential land use decisions in recent North Brooklyn history without ever having the actual appearance of these buildings clearly presented to them. That outcome corrupts the integrity of the advisory process and should weigh heavily on this body's assessment of Gotham's good faith.

B. The Renderings That Do Exist Were Designed to Minimize Visual Impact

Having reviewed Chapter 8 of Monitor Point's own Draft Environmental Impact Statement — the Urban Design and Visual Resources chapter — I can confirm that comparative view illustrations do exist. Figures 8-9, 8-10, and 8-11 show before-and-after views of the proposed towers from several vantage points in the neighborhood.

However, these illustrations tell their own story about transparency. Every single one is labeled "For illustrative purposes only." They are schematic massing and wire-frame diagrams — not photorealistic architectural renderings. They show the volumetric bulk of

the towers overlaid on photographs of existing streetscapes, but they are rendered as blank white forms, stripped of materiality, facade detail, shadow, and visual context. They are the minimum visualization required to satisfy a regulatory checklist, not the honest visual presentation of what these buildings will look like from the streets, the park, or the waterfront.

These are presented here as exhibits — directly from Gotham's own DEIS — because the community deserves to see them, even in this deliberately minimal form. What they show is already alarming: a 600-foot tower dominating the skyline from Franklin Street (Figure 8-10), dwarfing every existing structure in the neighborhood. A massive blank podium blocking the entire western end of Quay Street (Figure 8-9). Towers that, when viewed from Oak Street facing south (Figure 8-11), would fundamentally transform the character of one of Brooklyn's most cherished neighborhoods.

The DEIS itself acknowledges in its summary that "the taller of the two West Building towers would exceed the height of other buildings within a quarter mile of the Development Site by approximately 200 feet." Two hundred feet. That is the equivalent of a 20-story building stacked on top of the tallest existing structure in the neighborhood. And Gotham's response was to bury that fact deep in a technical document, render it as a blank white massing diagram, and decline to present it clearly to the community board reviewing the project.

If Monitor Point were a good project, Gotham would want the community to see it. The fact that they have gone to such lengths to avoid that visual reckoning speaks for itself.

C. The Borough President's Comprehensive Plan Requires Good-Faith Engagement

The 2025 Comprehensive Plan for Brooklyn calls for transparency and meaningful community engagement as prerequisites for sound land use decisions. Gotham's conduct throughout this process — the document dumps, the schematic-only visuals, the refusal to proactively present the building's actual appearance — represents a systematic failure of those standards. This body should take that pattern of conduct into account as it evaluates every other claim Gotham has made about community benefit, open space, and affordability.

IV. Monitor Point Poses Irreversible Harm to a Rare and Irreplaceable Ecological Resource

Bushwick Inlet is not simply a scenic amenity. It is a functioning tidal estuary — one of the last on the East River — and a critical piece of New York City's ecological infrastructure. The proposed development would place luxury towers 50 feet from its shoreline, with documented and inadequately mitigated impacts on wildlife, water quality, and coastal ecology.

A. Biodiversity and Migratory Birds

The Bushwick Inlet has been documented by Cornell University's eBird system as a designated birding hotspot. More than 80 species of birds have been recorded using the Inlet and its surrounding habitat, including numerous migratory species that rely on the area as a stopover during spring and fall migration along the Atlantic Flyway. The construction and long-term presence of two towers rising 600 and 450 feet directly adjacent to this habitat would create light pollution, glass strike hazards, and severe disruption to the ecological corridor that makes the Inlet viable as wildlife habitat.

The DEIS does not adequately address these impacts. A brief acknowledgment of bird presence is not a substitute for a serious analysis of mortality risk, habitat displacement, and the cumulative effect of adding two supertall towers to an already heavily developed waterfront.

B. Estuarine Ecology and Marine Life

More than 80% of marine life health in the region depends on functioning estuaries. Bushwick Inlet's tidal exchange supports a complex food web that extends far beyond its immediate shoreline. Construction disturbance, increased stormwater runoff from nearly 1.2 million square feet of new impervious surface, and the long-term alteration of the inlet's hydrological function all represent serious threats that the DEIS does not adequately quantify or mitigate.

The Inlet is currently in a rare state of ecological recovery — the first time in over 100 years that this shoreline is opening to the public and returning to something resembling its natural state. Monitor Point would arrest that recovery permanently.

C. Flood Risk and the Inadequacy of the DEIS Analysis

The 40 Quay Street site sits inside both the 100-year and 500-year flood zones. The DEIS acknowledges this but treats it as a design challenge to be engineered away — elevating the property to federal and city flood standards — rather than a fundamental reason to reconsider the appropriateness of high-density residential development at this location.

Knowingly placing thousands of residents in a 500-year flood zone, in an era of accelerating sea level rise and intensifying storm events, is reckless. It is also fiscally irresponsible: future flood damage, emergency response, and infrastructure costs will be borne by the public. The developer assumes the upside. The public assumes the risk.

The DEIS also does not adequately analyze the impact of relocating existing MTA infrastructure from one coastal flood zone to a site near sewage-inundated and Superfund-designated Newtown Creek. This is a compounding risk that deserves serious independent analysis, not a brief mention in a chapter focused on building aesthetics.

V. Legal and Policy Grounds for Denial

Beyond the substantive policy failures outlined above, there are specific legal and regulatory frameworks that this body should examine carefully in evaluating Monitor Point.

A. Consistency with the Greenpoint-Williamsburg Waterfront Access Plan

The 2005 Greenpoint-Williamsburg Rezoning created explicit commitments for parkland, including Bushwick Inlet Park. The Waterfront Access Plan attached to that rezoning established community expectations and legal entitlements that have not been fulfilled. The Monitor Point application, by proposing luxury development on land designated or expected to become part of Bushwick Inlet Park, directly conflicts with the intent and commitments of the 2005 rezoning framework. The City cannot extract density from a community in exchange for park commitments, fail to deliver those parks for 20 years, and then permit luxury development on the uncommitted land.

B. The Removal of Parkland Designation at 56 Quay Street

The Monitor Point application includes a proposal to remove the park designation from the adjoining property at 56 Quay Street in order to transfer air rights to the 40 Quay Street development site. This site was originally planned to be part of Bushwick Inlet Park. Removing its park designation to enable over 300,000 square feet of additional development rights for Gotham is an unconscionable diminishment of the public park system — and one that requires serious scrutiny under both state parkland alienation law and city policy governing the disposition of park-designated land.

The New York State Legislature has long held that parkland is held in public trust and cannot be alienated without specific legislative authorization. The legal question of whether this transfer requires such authorization — and whether it has been obtained — deserves a clear, public answer before this application proceeds any further.

C. CEQR Open Space Standards

The City's own CEQR Technical Manual requires 2.5 acres of open space per 1,000 residents. As documented in the DEIS and confirmed by the save the inlet community analysis, this neighborhood currently has 0.6 acres per 1,000 residents. Monitor Point would bring approximately 3,000 new residents while adding less than 50,000 square feet of open space — a fraction of the 300,000 square feet that CEQR standards would require to serve those residents. The DEIS acknowledges this gap but concludes it does not rise to a "significant adverse impact" under CEQR. That conclusion is legally and factually contestable and warrants independent review.

D. The Scale of the Proposed Rezoning

The current R6 zoning at 40 Quay Street was specifically assigned in 2005 to provide a sensitive transition between the high-density R8 waterfront corridor to the west and the

lower-density residential blocks to the east. The DEIS acknowledges that the West Tower would "exceed the height of other buildings within a quarter mile of the Development Site by approximately 200 feet." A rezoning that produces a 600-foot tower — 200 feet taller than anything else in the quarter-mile study area — in a zone specifically designed to protect neighborhood scale and park adjacency is not a modest adjustment. It is a fundamental transformation that requires a much higher standard of justification than Gotham has provided.

VI. The Community Has Spoken — Clearly and Consistently

This is not a close call in the eyes of the community this land belongs to. More than 5,300 residents have signed a petition demanding that Monitor Point be denied. The Community Board 1 Land Use Committee voted NO with conditions — the strongest available advisory rejection. Community members have shown up at every public hearing, submitted testimony, organized, and fought for this park for over 20 years.

The 2005 rezoning was a deal. The community accepted density in exchange for parks. The parks were never delivered. Now a developer wants to take the last remaining piece of that undelivered promise and build luxury towers on it, with the minimum legally required affordability, while burying its own visual impact studies in thousands of pages of technical documentation rather than showing the community what it will actually look like.

Borough President Reynoso, you have built your legacy on the principle that land use decisions must serve communities equitably — not just developers efficiently. Your 2025 Comprehensive Plan is a testament to that commitment. Monitor Point is a test of it.

We ask you to honor your own plan. Honor the community's 20-year wait. Honor the tidal estuary that is finally beginning to recover. And deny this application.

VII. Conclusion and Requested Action

For the reasons set forth in this testimony, I respectfully urge the Brooklyn Borough President and the New York City Planning Commission to:

- Vote NO on the Monitor Point rezoning application at 40 Quay Street
- Require the completion of Bushwick Inlet Park as promised under the 2005 Greenpoint-Williamsburg Rezoning
- Direct the City to explore 100% affordable development alternatives for public land in

this community

- Commission an independent review of the parkland alienation question at 56 Quay Street before any further approvals are granted
- Require Gotham Organization to produce full, photorealistic architectural renderings of the proposed development and present them publicly before any further approvals are granted
- Consider the deliberate lack of transparency in the public review process as a material factor weighing against approval

This community has waited long enough for its park. It has absorbed more than its share of new development. It has spoken clearly, loudly, and through every legitimate channel available. The answer to Monitor Point must be no.

Respectfully submitted,

Matt Meoni

Exhibits Referenced in This Testimony

- Exhibit A: Figure 8-9, Monitor Point DEIS Chapter 8 — Comparative View Facing West at Quay Street and Franklin Street ("For illustrative purposes only" — Gotham's own document)
- Exhibit B: Figure 8-10, Monitor Point DEIS Chapter 8 — Comparative View Facing Northwest on Franklin Street ("For illustrative purposes only" — Gotham's own document)
- Exhibit C: Figure 8-11, Monitor Point DEIS Chapter 8 — Comparative View Facing South on West Street ("For illustrative purposes only" — Gotham's own document)
- Exhibit D: Figure 8-7, Monitor Point DEIS Chapter 8 — Proposed Development Axon Diagram ("For illustrative purposes only" — Gotham's own document)
- Exhibit E: Save the Inlet Petition — 5,300+ signatures in opposition (savetheinlet.org)
- Exhibit F: Borough President Reynoso, 2025 Comprehensive Plan for Brooklyn — Housing, Climate, Open Space, and Public Realm policy frameworks

From: [sandravb](#)
To: [Testimony](#)
Subject: [EXTERNAL] May 27th 11:00am Subcommittee on Zoning & Franchises - Testimony
Date: Thursday, May 28, 2026 11:49:24 AM

To Whom It May Concern,

I attended this 5/27 meeting via Zoom to oppose the Monitor Point project at 40 Quay St, 11222 in Greenpoint, Brooklyn. The following is a transcript of my testimony:

Hi my name is Sandra Baptista, and I strongly oppose the Monitor Point project. I am a local resident in Williamsburg.

My ability to live in Williamsburg has not been an easy one. I lived in Williamsburg 2010 to 2013 and then got priced out. Interestingly enough, I moved to Greenpoint. I was only able to do that because of a personal connection to a Polish couple with a building that they then sold. So I moved out of the area for 7 years. I moved back to Williamsburg in 2022 because the love of my life invited me to move in with him. That was serendipitous and I truly appreciate how lucky I am - I never saw myself as a Williamsburg resident again. In those intermittent years away, I never left Williamsburg - I worked at restaurants from Metropolitan Ave to Berry St. I worked at Teddy's bar and Grill!

I do remember the New Kings Democrats of which Lincoln Restler is a proud founding member, using the back room of Teddy's for meetings. We, the workers never did engage in a discourse with the New Kings though, which I wish we had. I would have said to them as I say now that the argumentation back and forth about a baseline income of nearly \$80k and a baseline number of affordable units within a luxury building is bogus. These quantitative questions don't answer the questions of how to effectively pull at the root of the housing crisis. Gotham and other developers are the root of the housing crisis themselves! I want to see more social housing owned by the city akin to the programs in Vienna, Austria as well as Singapore. In Singapore, the public housing board turns renters into home owners, by the way. I can't go too much into it so I ask all workers to turn into working class heroes by reading up on successful social housing programs that provide a quality of life we do not see currently with the public housing program provided by New York City. It's not impossible for a government to truly take care of you and your housing and see housing as your human right. Let's not get used by private developers as they continue to displace the worker.

And I urge you, Lincoln Restler, to defend progressive housing practices exclusively! If not now, when? Let's stop prioritizing private developers!

I spoke over Zoom at the very end of the meeting to Lincoln Restler and maybe one other councilmember which felt different to the room full of people and a full panel of government representatives earlier in the day. I am submitting this now so that everyone initially at the meeting has access to my testimony.

Thank you and sincerely,

Sandra Baptista
Williamsburg resident
[REDACTED]
Brooklyn 11249

From: [REDACTED]
To: [Testimony](#)
Subject: [EXTERNAL] Monitor Point - CB1 testimony
Date: Thursday, May 28, 2026 8:22:19 PM

[REDACTED]

I urge you to vote NO on the Monitor Point rezoning in North Williamsburg.

North Brooklyn has already added nearly 24,500 housing units since 2010, yet rents still increased by 107% and affordability declined. The vast majority of new development has been market-rate luxury housing, while deeply affordable housing remains insufficient. This demonstrates that luxury towers alone are not solving the housing crisis for working New Yorkers.

Our community is already overcrowded and severely lacking in green space. Parks, sidewalks, transit, schools, and basic infrastructure are under enormous strain. Adding more luxury towers without meaningful public open space will worsen quality of life, heat vulnerability, congestion, and inequity in a neighborhood that already feels overbuilt.

The rezoning risks accelerating displacement and gentrification in North Williamsburg. Median income and property values have soared while lower-income residents continue to be priced out. Affordability was clearly a defining issue for New Yorkers in recent elections, and residents are demanding policies that prioritize livability and truly affordable housing, not more luxury development disconnected from local needs.

Please prioritize green space, infrastructure, and community over lobbying.

Sincerely,
Vanessa Rios

11249



Outlook

[EXTERNAL] Say NO to Monitor Point Rezoning

From

[REDACTED]

Date Tue 5/26/2026 10:03 AM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report suspected phishing emails with the Phish Alert Button or forward them to phish@oti.nyc.gov as an attachment.

Council members,

I'm writing to voice my opposition to the Monitor Point project. As a CB1 resident, I see every day that our neighborhood already needs more true public green space for residents and visitors, not thousands more luxury units with almost no parkland added. Domino park is already bursting through the seams with people trying to enjoy a bit of sunlight. The beach at Marsha P Johnson is packed every weekend to the point of being repellent. These are all symptoms of an underlying condition.

Not to mention that Greenpoint/Williamsburg is already overcrowded and under-supported. Adding massive towers in a flood zone, while temperatures and extreme weather worsen every year, is reckless and will make the waterfront an increasingly unlivable for residents and future generations.

I believe you will do the right thing,

Thank you!

Vanessa Rios

11249

VERONICA ZAPASNIK

Longtime Greenpoint Resident + Small Business Owner
Nearly 20 Years in Financial Research, Analysis & Public Policy

May 27, 2026

MBA, University of Chicago
BA, Political Science, University of Pennsylvania

11 years at the Federal Reserve Bank of NY – Policy & Markets Analysis
<https://www.linkedin.com/in/veronicazapasnik/>

Testimony to the New York City Council: Monitor Point, Brooklyn

Monitor Point / Bushwick Inlet Park — CEQR No. 25DCP068K &
Related ULURP Application Numbers: C 260105 ZMK, N 260106 ZRK, C 260107 ZSK, N 260108 ZCK, C 260109 ZSK, N 260110 LDK, and C 250326 MMK

I submit **this testimony (Page 1-18) together with an appendix (Page 19-92) containing my critique of the applicants' draft Environmental Impact Statement (DEIS)**, which provides the full technical record and reflects months of rigorous analysis underlying the points raised in this testimony. My comments focus on the applicant's most consequential analytical failures and the reasons this application should not be approved as proposed.

I respectfully ask Council Members to visit the newly opened Bushwick Inlet itself – the Motiva Parcel at 1 Franklin Street – before voting. Seeing Bushwick Inlet and the adjacent MTA brick one-story building matters here.

Since April 29, it is now possible to stand at the water's edge at Bushwick Inlet, understand the natural-resource significance of this location, and see what the applicants are asking the City to place directly beside it. That visit would also make clear the severe planning consequences of introducing a tower of roughly 600 feet at this edge: not just ecological consequences, but visual, neighborhood, sunlight, and public-realm consequences for the surrounding area.

Executive Summary

The Council should reject the application as proposed, as it fails to meet CEQR standards and sound planning principles. The applicant may instead proceed with an as-of-right development under existing zoning, which would achieve key project objectives without the significant adverse impacts identified. Importantly, the MTA's own 2021 staff summary indicates that Gotham agreed to relocate the MTA Mobile Wash Unit on Lot 1 even if the requested up-zoning were denied, undermining one of the applicants' central arguments for the full rezoning package.

The reasons are numerous:

1. **The applicants present a false choice.** They frame the decision as their preferred high-rise scheme or near-total inaction, rather than seriously testing the range of reasonable alternatives required for a publicly controlled site. A smaller or differently configured project remains possible, and the MTA facility relocation does not depend on approval of this full rezoning package.
2. **This is a public-land deal with extremely low financial returns to the MTA:** The MTA's confirmed expected revenue of \$50 million in net present value under a 99-year lease to Gotham is a very small return relative to the permanent neighborhood consequences of the full up-zoning. This 99-year return is **equivalent to ONE MONTH of congestion pricing revenue the MTA currently receives.** It is also the cost of making **just ONE subway station ADA accessible.** These figures were confirmed by the MTA and Gotham during the Brooklyn Borough President public hearing on 03/11/2026, and can be accessed in the publicly available video recording.
3. **The project worsens an already unacceptable open-space deficit.** The applicants acknowledge that the active open-space ratio would fall from **1.07 to 0.98 acres per 1,000 residents**, even though the City's planning goal is **2.0 acres per 1,000 residents** for active open space. That is not a minor shortfall; it is a worsening of an already severe deficiency.
4. **The applicants misrepresent the natural-resource significance of this site, clearly visible at the newly opened Bushwick Inlet park's Motiva parcel as of April 29, 2026.** They claim the Development Site does not contain natural resources of significant value, even though the project directly fronts Bushwick Inlet and the East River, and even though City Planning itself recognized in its **March 14, 2005 report** that Bushwick Inlet is the only sheltered body of water along this stretch of the East River waterfront and important for habitat and public access. The newly opened Motiva section of Bushwick Inlet Park makes that significance more visible than ever.
5. **The applicants misrepresent the project's public-space benefits, using private terraces and required WPAA to obscure the real deficit.** They repeatedly advertise approximately **50,000 square feet** of new open space, but their own materials show that only **43,000 square feet** would be publicly accessible, including **34,000 square feet of required WPAA** and **9,000 square feet of PAA**; they also rely on **approximately 18,000 square feet of private rooftop terrace space** and other non-equivalent spaces to soften the project's worsening open-space burden.
6. **The applicants' logic is especially flawed because it treats an existing deficiency as a reason to tolerate making that deficiency worse.** Nowhere is that clearer than in the open-space analysis, where an already-deficient active open-space system is used to excuse further deterioration.
7. **The applicants' affordability narrative is deeply misleading.** The large majority of the project's **1,150 units** would be market-rate. Based on broker estimates and comparable nearby luxury towers, 2–3 bedroom units appear likely to rent for roughly **\$9,000–\$16,000 per month**. This is one of the mechanisms by which Greenpoint/Williamsburg have become less affordable over the past decade: **luxury rents at the top of the market do not stay contained there, but instead establish new benchmarks** that filter through the neighborhood, raising asking rents and accelerating residential and commercial

displacement.

A recent study by researchers at several leading universities—UC Berkeley, the University of Toronto, Georgia Tech, and UCLA—also argues that **housing unaffordability** is not driven by simple supply shortage, but **driven more by income inequality and capital concentration**, undercutting the claim that adding more luxury supply on this public site will meaningfully improve affordability.

Research Study: *“Inequality, not regulation, drives America’s housing affordability crisis”*
Study URL: https://ideas.repec.org/p/osf/socarx/95trz_v1.html

8. **The project is out of scale with this specific waterfront and park-edge location.** The applicants acknowledge that the tallest tower would **exceed nearby buildings** within a quarter mile **by 200 feet**, yet still insist there would be no adverse urban design, visual, or neighborhood character effect. Council Members should visit the newly opened Motiva parcel before voting to see the inlet, the park edge, and the magnitude of what is proposed.
9. **The applicants have not presented the project honestly to the public in visual terms.** They have repeatedly relied on softened, conceptual imagery while **withholding clear, representative, true-to-scale depictions** of the buildings at the site. The only actual physical scale model that has surfaced publicly appears buried in Appendix D of the Environmental Impact Statement, the wind-study analysis conducted by Gradient Wind.
10. **The applicants repeatedly present advocacy as analysis.** Their materials assume the project “enhances” neighborhood character, “fulfills” earlier planning goals, and improves the public realm, while minimizing the real tradeoffs of bulk, height, waterfront siting, ecological harm, setting new luxury market rate rent benchmarks, and cumulative neighborhood burden.

Introductory Exhibits

EXHIBIT 1 below: The applicants misrepresent the natural-resource significance of this site, now clearly visible at the newly opened Bushwick Inlet Park Motiva Parcel as of **April 29, 2026**. City Planning itself recognized in 2005 that Bushwick Inlet is a unique sheltered body of water along the East River waterfront, valuable both as natural habitat and as a place for public access and enjoyment. This **image shows that ecological and public-resource context directly adjacent to Lot 1, owned by the MTA, where the existing one-story red brick building** appears on the right.

Source: Veronica Zapasnik personal photography, April 2026



EXHIBIT 2 below: The nearest existing high-rise is the **Calyer tower (400 feet high)** in the far distance behind the park – the proposed Gotham tower would be **1.5x its height (600 ft high)**.



EXHIBIT 3 below: Since the April 29 opening of Bushwick Inlet Park’s Motiva Parcel, the inlet’s habitat value is easier than ever for the public to observe directly. On any given day, dozens of birds can be seen in the water and along the surrounding shoreline, underscoring the ecological significance of this sheltered inlet environment. The decision to build the original MTA building at this edge (seen in Exhibits 1 and 2) at height of only one story reflects the area’s longstanding significance as a bird migration zone.

Source: Veronica Zapasnik personal photography, April 2026



EXHIBIT 4 below: The only public-facing true-to-scale representation of the project is buried in Appendix D – the Windy Study – of the Environmental Impact Statement. True-to-scale visuals have been omitted from all public marketing presentations by the applicants. The applicants refused to provide true-to-scale renderings when requested by the CB1 Land Use Committee.

Source: DEIS, Appendix D, Wind Study



This application presents a false choice on public land

One of the clearest flaws in the applicants' case is the way they define the choice before the Council. Across their environmental review and supporting materials, they repeatedly suggest that the public must choose between the preferred tower scheme and a No-Action scenario in which the site largely remains as it is. That is not a serious alternatives framework for a publicly controlled waterfront site. It is a false binary.

That framing matters because the MTA is not a passive bystander. It is a co-applicant and public landowner. This is exactly the kind of project where a broader alternatives analysis is necessary, not less necessary. A publicly controlled site should not be analyzed as though the applicants' preferred massing and density are the only realistic redevelopment option. The Council should be especially wary when the applicants define their own preferred scale as the baseline for what counts as feasible.

Just as important, rejecting this application would not mean rejecting all redevelopment. The applicants may still proceed with an as-of-right development under existing zoning. Importantly, **the MTA's own 2021 staff summary indicates that Gotham agreed to relocate**

the MTA Mobile Wash Unit on Lot 1 even if the requested up-zoning were denied, undermining one of the applicants' central arguments for the full rezoning package. The question before the Council is not whether something can happen here. The question is whether **this** scale and **this** configuration of development should happen here.

EXHIBIT 5 below: Conceptual ALTERNATIVE VISION, illustrating that the MTA's public land on Lot 1, together with the existing parkland on Lot 25, could support a substantially lower-scale outcome with expanded integrated park space, **rather than the false binary presented by the applicants between the proposed mega-project and no meaningful change.**
Source: Save the Inlet deck submitted to Community Board 1 and Councilmember Restler.



This is a public-land deal with extremely low returns: MTA revenue of \$50 million in NPV over a 99-year lease equals just ONE MONTH of congestion pricing revenue

This project is being advanced on public land, and the public return matters. The MTA and Gotham indicated that this **99-year lease** would generate approximately **\$50 million in net present value** for the MTA, with about **\$10 million at construction start** and roughly **\$2 million annually** thereafter. That is a remarkably small return relative to the scale and permanence of the project's neighborhood impacts. These figures were confirmed by the MTA and Gotham during the Brooklyn Borough President public hearing on 03/11/2026, and can be accessed in the publicly available video recording.

This is an extraordinarily low public return. For context, **\$50 million is what the MTA currently earns from ONE MONTH of congestion pricing revenue.** It is also approximately the cost of relocating the current Mobile Wash Unit facility at Lot 1. The same \$50 million is **also the cost of making just ONE subway station ADA accessible.**

These comparison figures are not rhetorical flourish. They were confirmed by the MTA and Gotham on 03/11/2026, and provide a clear reason to reject the requested up-zoning. **Ninety-nine years of leasing public land would yield the MTA only the equivalent of ONE MONTH of congestion pricing revenue.** In other words, the permanent neighborhood

consequences of this project — increased luxury-rent spillover, greater density, and a worsening open-space deficit — are being exchanged for a level of public value that is extraordinarily small by the MTA’s own operating and capital standards.

That weakness matters because the applicants repeatedly try to present this project as though the public had only one realistic way to unlock value here. That is not true. **Public land at Bushwick Inlet is not limited to a single oversized luxury development model. If the return is this low, the Council should ask much harder questions about whether this site would be better used for park expansion, open space, climate adaptation, or a substantially smaller project** that does less harm.

The project explicitly worsens an already unacceptable open-space deficit, one of the lowest in the city

This is one of the strongest and most straightforward issues in the record because the applicants admit the key numbers themselves. Their open-space analysis states that the project would add approximately **2,795 residents** and reduce the active open-space ratio from **1.07 acres per 1,000 residents** to **0.98 acres per 1,000 residents**. The City’s own planning goal is **2.0 acres per 1,000 residents** for active open space. In other words, the project does not merely operate in a deficient area; it pushes an already deficient area even further below a benchmark it is already failing to meet.

The applicants try to explain that away by pointing to the neighborhood’s existing shortage, the Walk-to-a-Park designation, new waterfront access space, private terraces, and annual funding for park operations. But that reasoning does not hold. **Private terraces are not public open space**. Maintenance funding is not acreage. A waterfront promenade is not the same thing as meaningful neighborhood-serving active recreation space. And proximity to a park does not answer the question of whether there is enough **active** open space for the people being added.

The applicants’ logic is especially flawed because it treats an existing deficiency as a reason to tolerate making that deficiency worse. That is exactly backward. A neighborhood that already lacks enough active open space is the very place where additional burdens should be scrutinized most carefully, not excused most easily.

This issue is inseparable from the long-delayed promise of Bushwick Inlet Park. For two decades, the community has been waiting for a park system that remains unfinished. Against that backdrop, it is especially troubling for the applicants to argue that a project which worsens the active open-space ratio should still be viewed as a public-space success.

The applicants misrepresent Bushwick Inlet’s natural-resource significance, clearly visible today at the newly opened park’s Motiva parcel (1 Franklin St., as of April 29)

In their Environmental Impact Statement, the **applicants state that the Development Site “does not possess any natural resource of significant value”**. That is one of the most

troubling statements in the record. It reduces a complex waterfront ecological setting to the narrowest possible description of the development parcel -- while ignoring the significance of what the site actually fronts: Bushwick Inlet, an ecologically meaningful resource that the City has already recognized as special.

The applicants' dismissal is hard to reconcile with the City Planning Commission's own prior recognition of Bushwick Inlet. In its March 14, 2005 report, the Commission described Bushwick Inlet as the only sheltered body of water along this stretch of the East River waterfront and **expressly noted its importance for habitat and public access.** I emphasize this important planning point: the MTA lot was part of the carefully crafted **R6 buffer logic** at this edge of the waterfront, while **Lot 25 was separately designated as parkland to be included in Bushwick Inlet Park.** This application asks the Council not only to overwhelm that buffer logic with towers, but also to remove the existing park identification from Lot 25.

I respectfully ask the Council Members to visit the newly opened Bushwick Inlet itself -- the Motiva Parcel at 1 Franklin Street -- before voting. Seeing Bushwick Inlet and the adjacent MTA brick one-story building matters here. As of April 29, it is now possible to stand at the water's edge, understand the natural-resource significance of this location, and see what the applicants are asking the City to place directly beside it. That visit would also make clear the severe planning consequences of introducing a tower of roughly 600 feet at this edge: not just ecological consequences, but visual, neighborhood, sunlight, and public-realm consequences for the surrounding area.

This is why the applicants' framing is so inadequate. The issue is not merely whether the site contains native upland vegetation or whether portions of the lot have been previously used for industrial purposes. The issue is that this project sits directly beside Bushwick Inlet itself, on a sheltered, ecologically meaningful waterfront edge that the City has already recognized as special, and on a site the City once treated as part of a deliberate transition from tower districts to the inlet and park.

In its **March 14, 2005 report**, the Commission said:

"The Commission notes the **particular importance of the Bushwick Inlet** in the geography of this waterfront. **The inlet is the only sheltered body of water along this stretch of the East River waterfront**, which is dominated by strong tidal currents. The inlet therefore would provide unique opportunities for the public to experience the waterfront, including the potential for recreational boating. The Commission also acknowledges the Community Board's **recommendation to establish and protect natural habitat along the waterfront, particularly in the area of the Bushwick Inlet.** While opportunities for ensuring areas of habitat and naturalistic conditions at the water's edge are limited on private development sites, the Commission believes that the proposed park would provide opportunities to promote various conditions at the inlet, including **areas of habitat as well as opportunities for public access to the sheltered waters of the inlet.**"

(Source: New York City Planning Commission, Calendar No. 6, N 50110(A) SRK at 85.)

The applicants also rely too heavily on future permits and best management practices to minimize concern. Regulatory permitting is not a substitute for environmental disclosure. A project that removes and replaces the existing shoreline revetment, constructs a new

bulkhead, and disturbs adjacent waters cannot be described as ecologically insignificant simply because later permits may impose conditions.

EXHIBIT 6 + 7 below: Bushwick Inlet Park – Motiva Parcel – and its unique natural resources. Lot 1, owned by MTA, contains the one-story red brick building adjacent to the park on the right. Bushwick Inlet is a wetland, and currently serves as a natural habitat for many species. *Source: Veronica Zapasnik personal photography, April 2026*



The applicants misrepresent the project’s public-space benefits, using private terraces and required WPAA to obscure the real deficit

The applicants’ public-benefit case is misleading in both quantity and quality. They repeatedly advertise **approximately 50,000 square feet** of new open space. But their own materials show that only **43,000 square feet** would be publicly accessible, including **34,000 square feet of required Waterfront Public Access Area (WPAA)** and **9,000 square feet of Public Access Area (PAA)**. The remaining **7,000 square feet** would consist of open space for museum visitors plus landscaping and planting areas. The same record also says that approximately **2,000 square feet** of the vehicle turnaround area would be counted as PAA, and that project residents would have access to **approximately 18,000 square feet of private outdoor terrace space**.

These are not equivalent categories. Required waterfront access areas, vehicular turnaround space, landscaped areas, museum-adjacent areas, and private terraces are not substitutes for true neighborhood-serving public active open space. **Yet the applicants repeatedly blend them together in a way that makes the project’s public-space contribution sound larger and more meaningful than it really is.** Much of what Gotham now touts as new public open space is already required under the waterfront rules that would govern an as-of-right project.

The same misrepresentation appears in the treatment of Box Street Park. The applicants repeatedly invoke the future realization of Box Street Park as a benefit associated with this project, while also acknowledging that they do not control what happens on that site or when. A contingent off-site possibility should not be presented as though it were a delivered project benefit. Public benefits should be described with the degree of certainty they actually possess.

The result is a recurring pattern: the applicants count every favorable element at full value, even when those elements are required by zoning, constrained in use, private rather than public, or speculative rather than committed. The Council should evaluate this project based on what it actually delivers, not on the broadest possible packaging of its claimed benefits.

Luxury market-rate housing is not an affordability solution here, and in the long-run makes the entire neighborhood less affordable

This is not a debate about whether New York City needs housing. The question is whether this project—on this public waterfront site, at this scale, with this mix of units—is a credible affordability strategy. The applicants’ own project description states that the development would include **up to approximately 1,150 units**, of which **25 percent would be affordable** under MIH, meaning that **the vast majority of the project would still be luxury market-rate**.

The large majority of the project’s **1,150 units** would be market-rate. Based on current listings on StreetEasy in nearby luxury towers on Greenpoint’s waterfront (eg., Blue Slip), comparable 2–3 bedroom units are expected to rent for roughly **\$9,000–\$16,000 per month**. Those kinds

of rents do not function as a neighborhood affordability strategy. They function as **a new price signal for the surrounding market.**

A recent study by researchers at several leading universities—UC Berkeley, the University of Toronto, Georgia Tech, and UCLA—cited in my in-person testimony on **March 18**, “***Inequality, not regulation, drives America’s housing affordability crisis***,” argues that housing **unaffordability is not driven by simple supply shortage, but more by widening income inequality and the concentration of high earners who push rents upward across the market.** Used carefully, that research does not mean housing production is irrelevant. It means the applicants cannot simply assume that adding a large luxury project on public land will meaningfully improve affordability.

Study Title: “*Inequality, not regulation, drives America’s housing affordability crisis*”
Study URL: https://ideas.repec.org/p/osf/socarx/95trz_v1.html

This Council therefore does not need to accept a simplistic equation between “more units” and “better affordability.” On this record, the project’s affordability claims are too weak—and its market-rate luxury component too dominant—to justify the scale of the public-land giveaway and the harm to Bushwick Inlet and the park edge.

The project is out of scale with this waterfront natural habitat, park edge, and the surrounding historic brick neighborhood

The applicants’ own urban design analysis acknowledges that **the tallest tower would exceed nearby buildings within a quarter mile by approximately 200 feet.** Yet they still conclude that there would be no significant adverse impact on urban design, visual resources, or neighborhood character. That conclusion is too sweeping. A project of this height and bulk at this exact location—on the Bushwick Inlet waterfront and immediately adjacent to the park edge—**cannot be dismissed simply by pointing to a general trend toward waterfront development elsewhere.**

The applicants also say the project would not negatively affect the pedestrian experience and would improve views and pedestrian navigation. But the DEIS itself identifies Franklin Street and **nearby western-facing streets as places where Bushwick Inlet Park, the East River, and the Manhattan skyline are visible. Those existing views, open sky exposures, and the afternoon and evening light that come with them are part of the pedestrian experience now.** A wall of towers at this scale would materially alter that experience for people walking on Franklin Street and in the surrounding residential neighborhood, even if the applicants choose not to acknowledge that plainly.

This site is not just another parcel in a broad trend line. It is part of a highly visible waterfront edge, beside a unique inlet, next to an incomplete park system that has carried enormous symbolic and practical importance for the neighborhood for decades. The City Planning Commission’s own 2005 planning logic treated these lots as part of a transition zone—a buffer between taller towers and the inlet. **To allow a building as high as 640 feet right at that**

edge is not simply another increment of growth. It is a reversal of the very buffer logic that made the 2005 compromise workable.

Again, I urge the Council to visit the newly opened Bushwick Inlet itself before voting. Standing there makes the issue concrete. It becomes much easier to see what a tower of this height would do to the spatial and visual character of the natural inlet and its waterfront setting.



EXHIBITS 8 (ABOVE) + EXHIBITS 9 and 10 (BELOW): These photographs show the existing pedestrian experience and visual character at Bushwick Inlet Park, Franklin Street, and the surrounding western-facing neighborhood edge: Open sky, sunset views, afternoon and evening light, and a human-scale relationship between the park, the inlet, the existing one-story MTA building, and the surrounding neighborhood.

The proposed 600-foot towers, and wall of towers where the one-story red brick building resides today, would materially diminish these conditions and fundamentally alter the experience of this waterfront and park-edge setting.

Source: *Veronica Zapasnik personal photography, April 2026*



The applicants have not presented the project honestly to the public in visual terms; the only true-to-scale representations are buried in technical appendices

The applicants have also failed to present this honestly to the public. **Gotham has repeatedly declined to provide clear neighborhood renderings**, minimized the difference between its roughly **600-foot tower** and the **closest nearby 400-foot Calyer tower**, and compared Monitor Point to distant Long Island City towers instead of its actual Greenpoint context. In addition, the DEIS's key urban-design figures are repeatedly labeled "illustrative," "conceptual," and "for illustrative purposes only."

The applicants have never shown the public or Brooklyn Community Board 1's Land Use Committee a clear, representative, true-to-scale model or renderings in their public presentations, even when such visuals were explicitly requested.

Meanwhile, the only actual physical scale model that has surfaced publicly appears in **Appendix D of the Environmental Impact Statement, the Gradient Wind study**. The wind consultant explains that it built a **1:400 scale model** of the development and surrounding context.

That matters because urban design and visual impact are inherently visual. **If the clearest physical depiction of the project's true scale is buried in a technical wind appendix rather than centered in the applicants' public-facing materials**, then the public process has not presented the project candidly.

This wind-study revelation also creates a striking contradiction in the applicants' presentation. In their marketing presentation deck, they emphasize that Monitor Point would be just another tower in an already high-rise waterfront area, citing existing and planned residential towers to the north and west.

Yet in the public-facing appendix image of the wind-study model, **the proposed Gotham towers appear against a context dominated by 1- to 3-story neighboring buildings**, without the surrounding high-rise context being clearly legible. In other words, the applicants invoke nearby towers when it helps normalize their project, but the clearest true-to-scale visual representation actually made public shows that this claim is deeply misleading.

GRADIENTWIND

ENGINEERS & SCIENTISTS

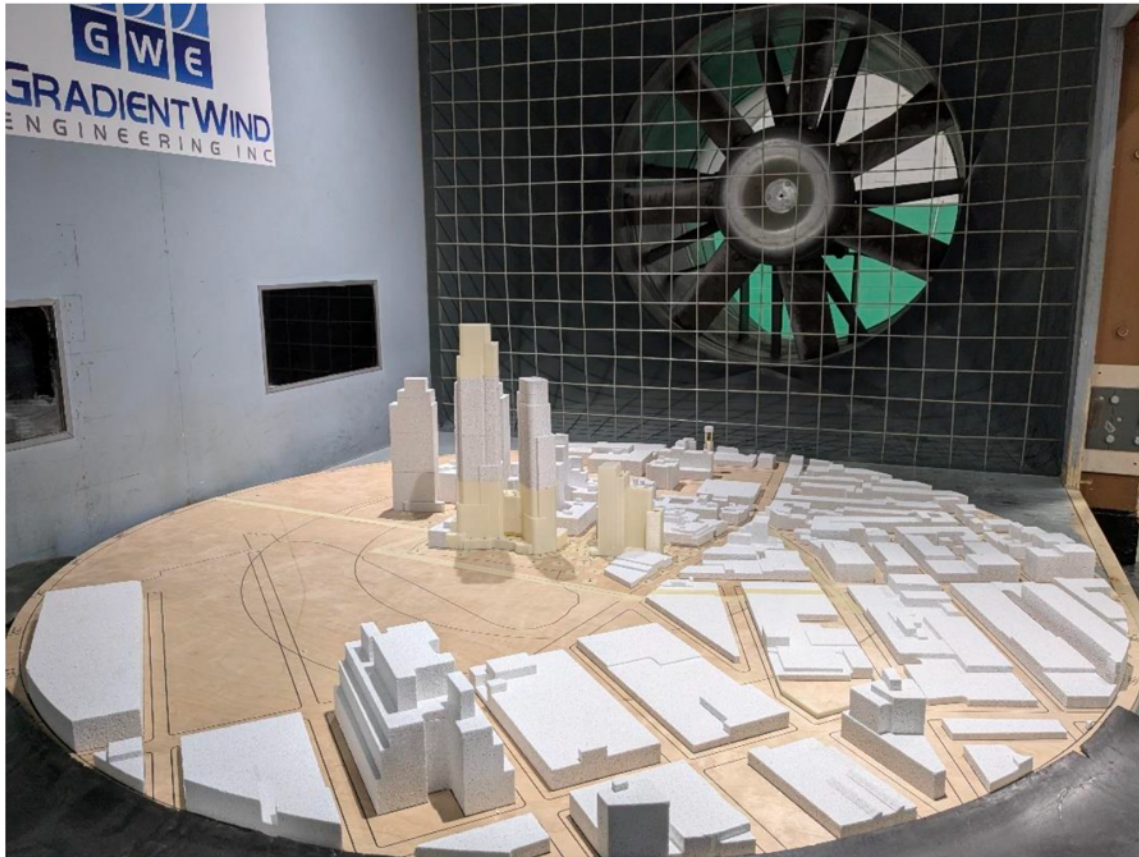
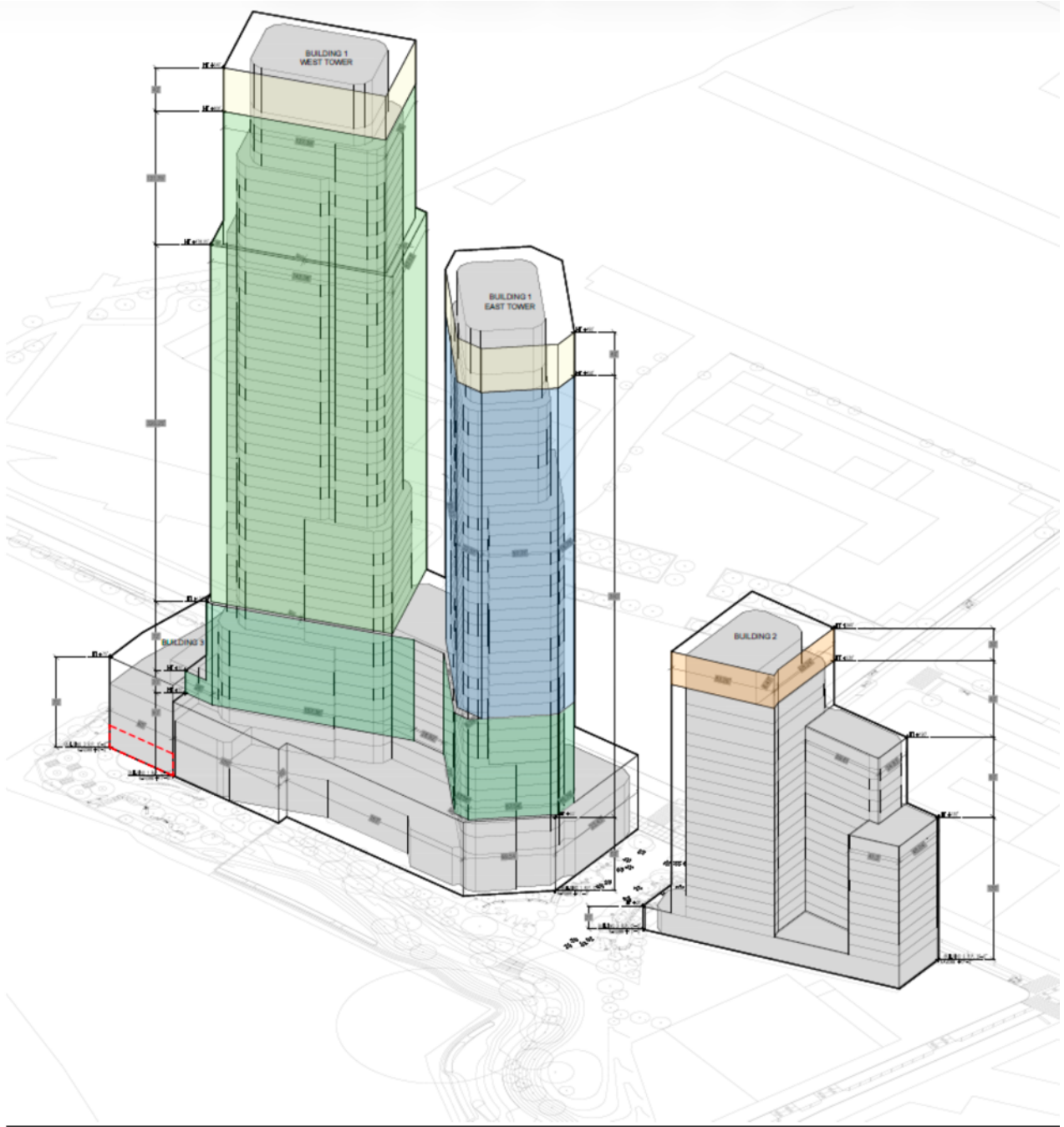


EXHIBIT 11 above This image from the DEIS Appendix D Gradient Wind study is the **only true-to-scale physical representation** of the project that has surfaced publicly. It was omitted from the applicants' public presentation materials, and the applicants did not provide true-to-scale renderings when such visuals were requested by the Brooklyn Community Board 1 Land Use Committee.

Source: DEIS, Appendix D, Wind Study



Drawing Z-027, Special Permit Drawing Set (Sept. 16, 2025) (filed with Gotham ULURP Application)..

EXHIBIT 12 above: This drawing, omitted from the applicants' public presentation materials, appears in the ULURP application and illustrates the extreme scale of the proposed towers at the Bushwick Inlet / park edge, immediately adjacent to the inlet's natural habitat and publicly accessible waterfront.

Source: Applicant's ULURP Application, Drawing Z-027, Special Permit Drawing Set (Sept. 16, 2025)

The applicants repeatedly present advocacy as analysis

A final concern cuts across the entire record. The applicants do not merely argue that the project has benefits. They repeatedly assume those benefits as if they resolve the central questions the Council is being asked to decide. Their materials treat the project as the fulfillment of prior City planning, say it enhances neighborhood character, insist that it improves the public realm, and describe its visual and urban design effects in overwhelmingly favorable terms. At the same time, the burdens are qualified, narrowed, or treated as inevitable.

That pattern appears again and again: the applicants use an existing open-space shortfall to excuse making that shortfall worse; they point to existing waterfront development to justify still more bulk at the park edge; they reduce Bushwick Inlet's significance to the condition of a development parcel rather than the reality of the inlet itself; and they package required public access areas, private terraces, and speculative off-site benefits as though all of them were comparable public gains.

That is not a hard look. It is a project narrative. The Council should be especially cautious when the applicants' central analytical move is to convert contested planning judgments into assumed truths. ULURP requires the Council to make its own judgment. It should not simply inherit the applicants' preferred framing of their own project.

Testimony Closing Statement

This application asks the City Council to accept too much at once: too much bulk at the Bushwick Inlet waterfront edge, too little public return for the use of public land, too much deterioration in an already unacceptable active open-space ratio, too much minimization of the natural-resource significance of Bushwick Inlet, too much reliance on misleading or speculative benefits, and too much confidence in an environmental review that too often reads as advocacy rather than neutral analysis. These are not obscure problems. They are visible in the applicants' own numbers, in their own framing, and in the City's own prior planning record.

The newly opened Bushwick Inlet Motiva Parcel itself (at 1 Franklin Street) underscores what is truly at stake here. It reveals the inlet more clearly, makes its waterfront ecology and public value more legible, and makes the scale of the proposed intrusion harder to ignore. I respectfully ask Council Members to visit the site before voting.

The Council should reject the application as proposed, as it fails to meet CEQR standards and sound planning principles. The applicant may still proceed with an as-of-right development under existing zoning, which would achieve key project objectives without the significant adverse impacts identified.

Importantly, the MTA's own 2021 staff summary indicates that Gotham agreed to relocate the MTA Mobile Wash Unit on Lot 1 even if the requested up-zoning were denied, undermining one of the applicants' central arguments for the full rezoning package.

For context, my DEIS submission to the City Planning Commission (**attached below**) provides the detailed technical and rigorous analysis supporting these conclusions.

APPENDIX: DOCUMENT 2 - BACKGROUND ANALYSIS:

WRITTEN TESTIMONY ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Monitor Point / Bushwick Inlet Park

CEQR No. 25DCP068K

40–56 Quay Street, Greenpoint, Brooklyn

Submitted to the New York City Planning Commission - March 30, 2026

- Submitted in solidarity with 5,500 petitioners opposed to the Monitor Point up-zoning and development, Friends of Bushwick Inlet Park, and Save the Inlet

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- **Comment 47: The chapter improperly dismisses significant traffic and pedestrian impacts by saying they are “similar” to conditions already found in the area**
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- **Comment 51: The chapter treats future permitting and BMPs as though they resolve significance, rather than independently demonstrating under CEQR why impacts are not significant**
 - **Page: 86**
 - DEIS Chapter / Section: Chapter 9, Principal Conclusions / Wetlands and Surface Waters / Essential Fish Habitat
- **Comment 52: The chapter glosses over the fact that the existing revetment is itself functioning habitat and assumes, without sufficient support, that the replacement bulkhead-and-revetment system will be ecologically equivalent or better**
 - **Page: 87**
 - DEIS Chapter / Section: Chapter 9, Existing Conditions / With-Action Condition / Wetlands and Surface Waters / Marine Habitat
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 - **Page: 90**
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Comments on DEIS Chapter 00 – Executive Summary

The Executive Summary deserves close scrutiny because, under SEQR/CEQR, a DEIS must include a “**precise summary**” that “**adequately and accurately summarizes the statement.**” Where the summary itself narrows the choice set, overstates benefits, or presents contested conclusions as settled, it can distort both public understanding and the administrative record before readers even reach the technical chapters.

Comment 1: The Executive Summary improperly frames the proposed project as the predetermined fulfillment of City policy

Chapter / Section: Executive Summary – Introduction / Development Site and Rezoning Area (ES-1 to ES-3; ES-7 to ES-8)

DEIS Claim / Statement:

“Lot 1 was rezoned to an R6 zoning district as part of the 2005 Greenpoint-Williamsburg Rezoning (CEQR #04DCP003K), establishing this site for future residential development. **The current proposal is the fulfillment of the City’s vision for this site as established by the 2005 rezoning.**”

Response:

This statement is too sweeping and too strategic for an Executive Summary. A prior rezoning that made residential development *possible* does not establish that this specific proposal—three buildings totaling approximately 1.215 million gsf, including towers of approximately **600 feet, 450 feet, and 230 feet**—is the singular or inevitable “**fulfillment**” of City policy. That

framing **collapses an important CEQR distinction between:** (1) a site’s permissible redevelopment potential, and (2) the specific discretionary proposal now being advanced by the applicants. CEQR requires the current proposal to be scrutinized as one option among reasonable alternatives, not treated as the presumptive realization of an already-settled public vision.

That concern is heightened here because the **MTA is not merely an adjacent stakeholder. It is a co-applicant and public landowner**, and the project is being advanced through discretionary public actions. **CEQR expressly contemplates a range of reasonable alternatives and makes clear that project size should not be treated as an untouchable objective that forecloses smaller-scale options.** By characterizing the current proposal as the “fulfillment” of an earlier rezoning, the Executive Summary risks prejudging the very question the DEIS is supposed to analyze: whether this particular redevelopment program, at this bulk and intensity, is justified when compared to other feasible public-land outcomes.

Why this matters:

The Executive Summary sets the frame for all later review. If it presents the preferred project as the natural or predetermined outcome of prior planning, it makes the later alternatives analysis appear narrower and more defensible than CEQR allows.

Requested correction / action:

City Planning should require the Executive Summary to be revised so that it states, more neutrally, that the 2005 rezoning enabled residential redevelopment on Lot 1, but did **not** dictate the current proposal’s bulk, program, or configuration. The summary should acknowledge that the present DEIS concerns one discretionary proposal among multiple potentially feasible alternatives.

Comment 2: The Executive Summary presents a false alternatives binary and overstates the infeasibility of lower-impact options.

Chapter / Section: Executive Summary – Alternatives / No Unmitigated Significant Adverse Impacts Alternative (ES-53 to ES-54)

DEIS Claim / Statement:

“The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the projected density increase and other components of the Proposed Actions are changed specifically to avoid the potential for any unmitigated significant adverse impacts associated with the Proposed Actions.”

“This analysis determined that under operational conditions, the addition of just three inbound project-generated vehicles ... would result in a traffic impact that could not be mitigated.”

“The Proposed Development would need to be reduced to just 45 residential DUs... or to 1,400 gsf of local retail space...”

“Therefore, to avoid any unmitigable transportation-related impact, the Proposed Development’s program would have to be substantially reduced below the thresholds described above **or the Development Site would have to remain in its existing condition.**”

“Without the density introduced by the Proposed Actions, it would not be feasible to deliver the intended community benefits...”

Response:

As presented in the Executive Summary, **this reads less like a neutral summary of alternatives analysis and more like an argument that the public must choose between the applicants’ preferred megaproject and something close to the status quo.** That is not how CEQR frames alternatives. **CEQR requires a range of reasonable alternatives** at a level sufficient for comparative assessment, always including No Action, but not limited to No Action. It also specifically states that a project’s size or scale should **not** be treated as an essential objective that automatically precludes a smaller-size or lesser-density alternative.

The problem here is not simply that the DEIS identifies transportation constraints. The problem is that the Executive Summary uses a highly specific transportation sensitivity exercise—“just three inbound project-generated vehicles”—to leap to a **sweeping policy conclusion that materially smaller development would not be feasible and that the site would effectively have to remain as-is.** That is a much broader claim than the quoted transportation finding supports. A CEQR-compliant alternatives framework should test whether lower-impact public-land options could still deliver some combination of housing, shoreline access, resiliency, museum space, and/or open-space benefits, even if not at the applicants’ preferred scale. The summary should not convert the applicants’ desired density into a prerequisite for any public benefit.

This issue is especially **important because the site is publicly controlled through the MTA’s ownership and co-application status. In that context, the universe of “reasonable” alternatives is potentially broader than in a purely private as-of-right redevelopment.** The Executive Summary should not frame the choice set so narrowly that the preferred scheme appears inevitable before readers have even reached the Alternatives chapter.

Why this matters:

A constrained alternatives frame can skew the entire environmental review by making the preferred project look like the only serious option. That undermines CEQR’s core function of testing whether other feasible approaches could reduce or avoid impacts.

Requested correction / action:

City Planning should require the Executive Summary to be revised so that it does not present a false binary between the preferred project and the site’s existing condition. The summary should clearly disclose that CEQR requires a broader range of reasonable alternatives—including smaller-scale, differently configured, phased, and other public-land options—and should avoid language suggesting that meaningful public benefits are impossible absent the applicants’ preferred density.

Comment 3: The Executive Summary overstates the open-space benefit and understates the significance of the project's open-space burden

Chapter / Section: Executive Summary – Introduction / Open Space / Open Space and Public Realm Improvements (ES-1 to ES-2; ES-17 to ES-18; ES-35)

DEIS Claim / Statement:

“The Proposed Development would also include substantial open space improvements. The development would include the creation of over an acre of waterfront open space (approximately 50,000 sf or 1.15 acres).”

“At the Development Site, the Proposed Development would include over an acre of new, waterfront open space (approximately 50,000 sf, or 1.15 acres), **43,000 sf of which would be publicly accessible including 34,000 sf of required WPAA and 9,000 sf of PAA...**”

“In the With-Action condition, **the active OSR would decrease by approximately 8.1 percent... The passive OSR would decrease by approximately 7.5 percent... The total OSR would decrease by approximately 7.7 percent...**”

“Although the active **OSR would remain below the City's planning goal...** the decrease in the active OSR would be offset by the provision of new public open space... long-term funding... and **private open space terraces for use by residents...**”

Response:

The Executive Summary markets the project's open-space program in a way that is materially more generous than the underlying numbers suggest. The summary repeatedly emphasizes “over an acre” of new waterfront open space, but it also acknowledges that a substantial portion of this area consists of **required waterfront public access components—including 34,000 sf of required WPAA—and that only 43,000 sf would be publicly accessible.** It also acknowledges that the **project would add approximately 2,795 residents** while **reducing the active, passive, and total open-space ratios, with the active ratio remaining below the City's planning goal even after the project.**

Under CEQR, open-space significance is not resolved by gross acreage alone. The Manual requires both quantitative and qualitative assessment, including attention to the type of open space provided, its usability, the balance of active and passive space, the capacity of existing resources, and the adequacy of new space for the affected population. CEQR also makes clear that percentage reductions above its guidance levels do not automatically end the inquiry; they typically lead to qualitative evaluation of whether open-space conditions and utilization would be adversely affected.

The Executive Summary's “offset” logic is especially weak. Private terraces for building residents are not a straightforward substitute for publicly accessible active open space serving the broader neighborhood. Nor does annual Parks funding erase the fact that the project would worsen active open-space ratios in an area where active open-space supply is already below the City's planning goal. The summary also blurs the distinction between a publicly accessible

waterfront passage and the type of active open space needed by a growing residential population. CEQR specifically instructs reviewers to consider the **balance of active and passive space** and whether the type of space provided is appropriate to the users added by the project.

Why this matters:

Open space is one of the core public-interest issues in this project. If the Executive Summary overstates the practical value of the new waterfront access areas while downplaying worsening active open-space conditions, it may materially mislead the public and the decision-makers about one of the project’s most important tradeoffs.

Requested correction / action:

City Planning should require the Executive Summary to:

1. clearly distinguish between required WPAA/PAA access areas and more flexible public open-space amenities;
2. disclose prominently that active, passive, and total open-space ratios all worsen, and that active open space remains below the City’s planning goal;
3. avoid relying on resident-only terraces as a substitute for neighborhood-serving public open space; and
4. summarize the open-space chapter in a way that reflects CEQR’s qualitative standards, not just acreage branding.

Comment 4: The Executive Summary improperly treats speculative off-site park benefits as though they are project benefits

Chapter / Section: Executive Summary – Introduction / NYCTA Relocation Site and ERU Site / Open Space and Public Realm Improvements (ES-3; ES-9; ES-17 to ES-18; ES-35)

DEIS Claim / Statement:

“The relocation of the ERU Facility ... would create a fully vacant site at Commercial Street, which would facilitate the full realization of the City’s planned Box Street Park by allowing for an additional approximately 25,000 sf of publicly accessible open space at the ERU Site in the future.”

“While the relocation of the ERU Facility would allow for the full realization of the City’s proposed Box Street Park... **the Applicants have no control over what will be developed at this location in the future or the timing of any future improvements.**”

“In addition to the on-site open space, the relocation of the NYCTA ERU Facility... would facilitate the full realization of the City’s planned Box Street Park, adding an additional approximate 25,000 sf of off-site open space to the park.”

Response:

These statements are internally inconsistent. On the one hand, the Executive Summary repeatedly touts the ERU relocation as helping deliver approximately 25,000 sf of additional

Box Street Park open space. On the other hand, it acknowledges that the applicants do **not** control what happens on that site or the timing of any future improvements. A benefit that is outside the applicants' control and not itself part of the land use actions cannot be treated as though it were a committed project-generated open-space outcome.

Under CEQR, future conditions and project effects must be described in a way that permits meaningful comparative assessment. A collateral benefit may be mentioned if it is reasonably foreseeable, but it should not be used to pad the project's public-benefit case or to offset impacts unless the relevant future action is sufficiently concrete and likely. Here, the Executive Summary uses Box Street Park as a recurring talking point while simultaneously disclaiming applicant control over the outcome. That is exactly the sort of ambiguity that should be clarified rather than marketed.

Why this matters:

The project's open-space case should stand or fall on actual project commitments, not on contingent off-site possibilities. Counting speculative future park expansion as though it were a delivered project benefit risks overstating the public upside of the proposal.

Requested correction / action:

City Planning should require the Executive Summary to distinguish clearly between:

- committed on-site improvements that are part of the Proposed Actions, and
- potential off-site future benefits that depend on separate public action outside the applicants' control.

If the Box Street Park outcome is not reasonably assured on a known schedule, it should not be presented as a delivered project benefit.

Comment 5: The Executive Summary minimizes waterfront ecological sensitivity and over-relies on future permitting and BMPs

Chapter / Section: Executive Summary – Natural Resources / Irreversible and Irretrievable Commitments of Resources / Effects on Disadvantaged Communities (ES-38; ES-59 to ES-60)

DEIS Claim / Statement:

“The Development Site is currently characterized by disturbed and developed conditions, **limited habitat value**, low plant and wildlife species diversity, and high levels of invasive plant species.”

“The Proposed Development would also result in the removal of the existing shoreline revetment and construction of a new sheet pile bulkhead and rock revetment within the same general footprint as the existing revetment, thereby avoiding permanent loss of tidal wetlands and associated impacts...”

“Temporary impacts to Bushwick Inlet and the East River... would occur during demolition and construction activities along the shoreline... both upland and in-water

construction activities would employ best management practices (BMPs) and would comply with all conditions... of the anticipated U.S. Army Corps of Engineers and New York State Department of Environmental Conservation permits... Accordingly, the overall impacts to wetlands and surface water are expected to be minimal and temporary in nature..."

"The Development Site **does not possess any natural resource of significant value...**"

Response:

The Executive Summary repeatedly uses the site's disturbed condition as a rhetorical shortcut to minimize ecological concern. That is not a sufficient CEQR analysis. For a waterfront site adjacent to Bushwick Inlet and the East River—and involving shoreline intervention, a new sheet-pile bulkhead, revetment work, construction noise and vibration, and stormwater-related claims—the relevant question is not whether the site is pristine. The relevant question is whether the project may directly or indirectly affect natural resources, habitat function, water quality, shoreline processes, or the ecological value of adjacent waters and shoreline.

CEQR's natural-resources framework is explicit on this point: Direct effects include marine structures, hydrologic changes, prolonged shadows on natural resources, increased lighting, altered water quality, sewer outfalls, and construction-related disturbance; where specifics are not known, conservative but reasonable assumptions are required; and construction-affected areas are counted even if restoration is planned later.

The DEIS **statement that the "Development Site does not possess any natural resource of significant value" is too categorical for a site that directly fronts the unique ecological resource that is Bushwick Inlet, and that proposes shoreline interventions along the inlet's edge.** At minimum, the Executive Summary should describe the ecological issue with more precision and modesty, rather than framing the site as environmentally negligible except insofar as the proposal claims to improve it.

In its March 14, **2005 report** accompanying the 2005 Greenpoint-Williamsburg re-zoning, this **City Planning Commission noted the uniqueness of Bushwick Inlet:**

"The Commission notes the particular importance of the Bushwick Inlet in the geography of this waterfront. The inlet is the only sheltered body of water along this stretch of the East River waterfront, which is dominated by strong tidal currents. The inlet therefore would provide unique opportunities for the public to experience the waterfront, including the potential for recreational boating. The Commission also acknowledges the Community Board's recommendation to establish and protect natural habitat along the waterfront, particularly in the area of the Bushwick Inlet. While opportunities for ensuring areas of habitat and naturalistic conditions at the water's edge are limited on private development sites, the Commission believes that the proposed park would provide opportunities to promote various conditions at the inlet, including areas of habitat as well as opportunities for public access to the sheltered waters of the inlet." (Source: New York City Planning Commission, Calendar No. 6, N 50110(A) SRK at 85)

Finally, the Gotham Organization’s DEIS Executive Summary also leans too heavily on the proposition that impacts will be “minimal and temporary” because BMPs will be used and permits will be obtained. Regulatory permitting is not a substitute for CEQR disclosure or significance analysis. A DEIS must independently assess and explain the nature of likely impacts; it cannot simply imply that future agency conditions will solve them. This is especially true where the summary itself acknowledges shoreline degradation, erosion, sedimentation, in-water work, and changes to shoreline structures.

Why this matters:

Bushwick Inlet is one of the most sensitive factual and public-interest dimensions of this project. If the Executive Summary reduces the natural-resources analysis to “the site is degraded, therefore impacts are minimal,” it risks understating one of the most consequential environmental issues in the case.

Requested correction / action:

City Planning should require the Executive Summary to:

1. acknowledge that ecological sensitivity can exist in a disturbed urban waterfront context;
2. summarize shoreline and adjacent-water impacts with more specificity;
3. avoid treating anticipated permits and BMPs as substitutes for CEQR significance analysis; and
4. revise conclusory language suggesting the site has no natural-resource significance.

Comment 6: The Executive Summary’s neighborhood character conclusion is too categorical and does not reflect CEQR’s combined-effects framework

Chapter / Section: Executive Summary – Neighborhood Character / Urban Design and Visual Resources / Construction (ES-38; ES-46 to ES-49)

DEIS Claim / Statement:

“The Proposed Actions would not result in a significant adverse impact to neighborhood character. **The Proposed Actions would enhance the neighborhood character** of the study area...”

“The Proposed Actions would not result in significant adverse impacts in the technical areas of land use, zoning, and public policy; socioeconomic conditions; open space; urban design and visual resources; historic and cultural resources; shadows; or operational noise.”

“The resulting traffic and pedestrian conditions would be similar to those already seen in the neighborhood... and construction impacts would be temporary in duration. As such, the significant adverse impacts related to transportation and construction would not result in a neighborhood character impact.”

Response:

This is too conclusory for an Executive Summary, particularly in a case involving towers of approximately 600 feet, 450 feet, and 230 feet; **worsening open-space ratios**; admitted significant adverse traffic, pedestrian, and construction-noise impacts; and a major change to a highly visible waterfront edge. **CEQR’s neighborhood character guidance does not allow the issue to be disposed of simply by listing several topic chapters as “no impact” and then asserting that neighborhood character is enhanced.** CEQR specifically states that neighborhood character may warrant analysis not only when a project has significant adverse impacts in contributing technical areas, but also when there is a combination of moderate effects across multiple contributing elements.

The **Executive Summary’s formulation appears to treat neighborhood character as little more than a derivative slogan:** because the project introduces housing, retail, and waterfront access, it is an “improvement.” That is not the CEQR standard. The CEQR inquiry is whether **defining features of the neighborhood may be affected, including through the combined effect of urban design, open space, shadows, traffic, noise, and related changes.** The summary should therefore be far more careful about presenting “enhancement” as a settled conclusion before the detailed synthesis is even read.

Why this matters:

Neighborhood character is one of the areas in which an Executive Summary can most easily oversimplify a complex record. The issue is not whether the applicants can identify some desirable project features; the issue is whether the project’s combined effects alter defining features of the area in a significant way.

Requested correction / action:

City Planning should require the Executive Summary to revise its neighborhood character discussion so that it:

1. reflects CEQR’s combined-effects framework;
2. avoids conclusory language that the project “enhances” neighborhood character unless that conclusion is rigorously supported; and
3. clearly discloses the extent to which the chapter depends on aggregating other technical findings rather than independently testing the combined effect of those changes.

Comment 7: The Executive Summary is not adequately balanced because it front-loads asserted benefits while downplaying admitted significant adverse impacts as routine or typical.

Chapter / Section: Executive Summary – Introduction / Construction / Public Health / Effects on Disadvantaged Communities (ES-3; ES-47 to ES-49; ES-46; ES-60)

DEIS Claim / Statement:

“The Proposed Actions would provide numerous benefits to the community...”

“Construction impacts would be temporary and are typical for a project of this size...”

“While significant adverse noise impacts could occur during construction, these would be temporary impacts resulting from conditions that are common during the construction of high-rise buildings in New York City.”

“As detailed below, construction at the Development Site would result in significant adverse transportation (traffic and pedestrian) and noise impacts...”

Response:

The Executive Summary is required to be precise and accurate. It is not enough for it to mention significant impacts somewhere near the end after repeatedly foregrounding the project’s purported benefits. Here, the summary opens and closes with extensive advocacy-like benefit language, while the admitted significant adverse impacts—particularly unmitigated or partially mitigated transportation and construction noise impacts—are either buried later or softened with language such as “typical,” “common,” or “temporary.” That is not a neutral way to summarize an EIS. A significant adverse impact remains significant even if it is common in New York City construction. **CEQR does not provide a “typical for a project of this size” exception to disclosure.**

This matters especially because the Executive Summary is often the only portion many members of the public, decision-makers, and even reviewing agencies read closely. If the summary is written in a way that sounds more like project promotion than balanced disclosure, it can skew the review process. The summary should plainly identify, near the front, the categories of significant adverse impacts the DEIS acknowledges and whether they are mitigated, partially mitigated, or unmitigated.

Why this matters:

A summary that is not balanced in tone and content can impair meaningful public review. CEQR requires the DEIS to disclose impacts clearly enough for informed comment, not merely to market the proposal’s upside.

Requested correction / action:

City Planning should require the Executive Summary to be revised so that:

1. the identified significant adverse impacts are disclosed clearly and prominently near the beginning of the summary;
2. the summary distinguishes between mitigated, partially mitigated, and unmitigated impacts; and
3. language suggesting that significant impacts are less consequential because they are “typical,” “common,” or “temporary” is removed or qualified.

Comments on DEIS Chapter 1 – Project Description

Because Chapter 1 establishes the project definition, stated purpose and need, affected area, build year, and No-Action framing that the rest of the DEIS relies on, weaknesses here are not

merely introductory. They can shape the entire environmental review by narrowing the comparison baseline, constraining the alternatives universe, and presenting disputed public-policy judgments as if they were settled facts.

Comment 8: The Project Description selectively defines the project area while still claiming off-site benefits outside the core action area.

Chapter / Section: Chapter 1, Introduction / Affected Area / NYCTA Relocation Site and ERU Site

DEIS Claim / Statement:

“The Rezoning Area, the remaining portion of Lot 1 that will not be rezoned, and the NYCTA Relocation Site are, collectively, the Affected Area...”

“The relocation of the ERU Facility ... would create a fully vacant site at Commercial Street, which would facilitate the full realization of the City’s planned Box Street Park by allowing for an additional approximately 25,000 sf of publicly accessible open space at the ERU Site in the future. No land use actions are associated with the departure of the ERU Facility from 65 Commercial Street...”

Response:

The Project Description **draws a selective boundary around what counts as the “Affected Area.”** It includes the Development Site, the unrezoned remainder of Lot 1, and the NYCTA Relocation Site, but not the ERU Site, even though the chapter repeatedly relies on the ERU Site’s future vacancy as a major public benefit of the Proposed Actions.

That is analytically problematic. If the applicants want to rely on the future availability of the ERU Site and the claimed advancement of Box Street Park as part of the project’s justification, they should explain much more clearly how that site is being treated in the environmental review: as part of the project’s causal chain, as part of the No-Action baseline, or merely as a speculative collateral effect. CEQR’s framework depends on an honest and coherent project definition. A project cannot be framed narrowly for purposes of limiting review, while at the same time framed broadly enough to capture public-benefit claims when that is advantageous.

This inconsistency is not just semantic. The chapter’s treatment of the ERU Site influences how readers understand project purpose, alternatives, public benefits, and future conditions without the action. If the ERU Site is outside the Affected Area and no land use actions apply there, then the chapter should not repeatedly present the future of that site as though it were a delivered element of the Proposed Actions. If, on the other hand, the applicants believe the ERU relocation is functionally part of the project’s environmental justification, that relationship should be explained more rigorously and reflected more transparently in the analytical framework.

Why this matters:

A selectively drawn project boundary can distort CEQR review by understating the project’s

scope for analytical purposes while overstating its public benefits for policy purposes. That weakens the integrity of the baseline and alternatives analysis.

Requested correction / action:

City Planning should require the applicants to clarify, in Chapter 1, how the ERU Site is being treated for CEQR purposes and to distinguish clearly between:

1. sites and actions that are part of the Proposed Actions and Affected Area;
2. off-site consequences of those actions; and
3. contingent future public benefits outside the applicants' control.

Comment 9: The Project Description improperly presents the current proposal as the predetermined fulfillment of prior City planning.

Chapter / Section: Chapter 1, Introduction / Existing Conditions / Neighborhood Context

DEIS Claim / Statement:

“Lot 1 was rezoned to an R6 zoning district as part of the 2005 Greenpoint-Williamsburg Rezoning ... establishing this site for future residential development. **The current proposal is the fulfillment of the City’s vision for this site as established by the 2005 rezoning.**”

Response:

This statement overreaches and prejudges the very issue the DEIS is supposed to evaluate. A prior rezoning that enabled residential redevelopment on Lot 1 did not dictate this particular project’s scale, configuration, density, or combination of discretionary actions. The present proposal includes a very large mixed-use development, major zoning changes, a City Map amendment, special permits, a long-term public land lease, and off-site relocation of NYCTA facilities. That is not simply the mechanical implementation of a preexisting City vision; it is a new discretionary proposal that must stand on its own record and be compared against reasonable alternatives under CEQR.

By characterizing the current proposal as the fulfillment of the 2005 rezoning, the chapter collapses the distinction between “residential redevelopment is permissible here” and “this particular megaproject is the proper realization of that policy.”

That framing biases the reader toward inevitability. **It also risks narrowing the alternatives inquiry by suggesting that the only relevant question is whether the applicants’ preferred project should proceed, rather than whether other feasible public-land and lower-impact development pathways exist. CEQR requires the project to be analyzed, not presupposed.**

Why this matters:

Foundational framing matters. If the Project Description treats the proposal as the natural culmination of prior City planning, it can make later alternatives, land-use, and neighborhood-impact analyses appear more settled than they are.

Requested correction / action:

City Planning should require the applicants to revise Chapter 1 so that it states more neutrally that the 2005 rezoning enabled future residential redevelopment on Lot 1, but did not determine the current proposal’s bulk, design, program, or public-land disposition choices.

Comment 10: The Project Purpose and Need is framed too narrowly and too strategically around the applicants’ preferred high-density outcome

Chapter / Section: Chapter 1, Project Purpose and Need / Description of Required Approvals / LSGD Special Permits

DEIS Claim / Statement:

“The Proposed Actions would enable the comprehensive redevelopment of a nonconforming industrial site, transforming it into a vibrant, mixed-use area...”

“Residential development under the existing R6 zoning would result in a lower density development than the Proposed Development, in which no affordable units and fewer market-rate housing units would be constructed.”

“The proposed site plan under the LSGD Special Permit would provide for the required public walkway and view corridors while simultaneously **maximizing housing production** on the Development Site.”

Response:

The chapter’s statement of purpose and need is written in a way that strongly privileges the applicants’ preferred density and development program. It repeatedly treats the current scale of residential production as part of the project’s defining objective, rather than as one option that must be tested against environmental constraints and reasonable alternatives. CEQR does not require project sponsors to abandon their objectives, but it does require that those objectives be framed in a way that still allows for meaningful alternatives review. CEQR’s alternatives guidance expressly states that project size should not itself be treated as an essential objective that forecloses consideration of a smaller-scale or lesser-density alternative.

That concern is reinforced by the special-permit language. Saying that the LSGD waivers and modifications are needed to achieve a “superior site plan” while “simultaneously maximizing housing production” suggests that maximizing yield is embedded in the project definition itself. That is precisely the kind of objective-framing problem that can distort the alternatives chapter later. A more neutral and CEQR-consistent formulation would identify legitimate goals—such as replacing the NYCTA facility, improving waterfront access, advancing affordability, and providing a permanent museum space—without embedding the applicants’ preferred bulk as a governing premise.

Why this matters:

If the purpose and need is defined around the desired density outcome, later alternatives

analysis can become a self-fulfilling exercise in which smaller-scale or differently configured options are dismissed for failing to achieve the very size the applicants chose at the outset.

Requested correction / action:

City Planning should require the applicants to revise the Project Purpose and Need section so that it does not define maximizing housing production or the current level of bulk as an essential project objective. The purpose statement should be reframed in a way that permits meaningful evaluation of smaller-scale, differently configured, phased, or other public-benefit alternatives.

Comment 11: The No-Action scenario is not “conservative” in the CEQR sense and is framed too narrowly

Chapter / Section: Chapter 1, Analysis Framework / Future No-Action Condition

DEIS Claim / Statement:

“Because Lot 25 is zoned M3-1 and shown as a park on the City Map, construction of the Greenpoint Monitor Museum and publicly accessible waterfront open space would not be feasible without the Proposed Actions. Therefore, no development would occur on Lot 25, and the lot would remain undeveloped.”

“As such, in the future without the Proposed Actions (No-Action condition), **it is conservatively assumed that existing conditions at the Development Site would remain.**”

Response:

The chapter labels this No-Action scenario “conservative,” but it does not explain why it is conservative in CEQR terms. CEQR’s framework requires a reasonable worst-case development scenario for both the No-Action and With-Action conditions, and it specifically instructs agencies to consider the reasonableness of site-specific No-Action scenarios. In some circumstances, where more than one distinct No-Action future is plausible, CEQR contemplates a range of No-Action possibilities rather than a single frozen baseline.

Here, the applicants effectively assume that absent the Proposed Actions, the Development Site would remain as it is through 2031. That may be one possible No-Action future, but the chapter does not show why it is the only reasonable one. **The applicants themselves acknowledge that Lot 1 is already zoned residential and that they have as-of-right plans for it under existing zoning**, yet the chapter still reduces the No-Action condition to a largely unchanged site because MTA Board approval would be needed for the relocation and lease structure embedded in the preferred proposal. That **does not, by itself, establish that no other No-Action or lower-intensity redevelopment pathway is reasonably foreseeable.** Nor does it explain why ongoing shoreline restoration work on Lot 25, interim public use, partial public access, separate museum-related actions, or other non-identical futures should be excluded from the baseline conversation.

In other words, the chapter appears to use the applicants' preferred deal structure—public lease, facility relocation, rezoning package—as the lens for defining what is “feasible” in No Action. CEQR requires a broader inquiry than that. **The No-Action baseline is not supposed to be a rhetorical foil that makes the preferred proposal look indispensable.** It is supposed to be a credible estimate of what could reasonably occur without the Proposed Actions.

Why this matters:

A narrow or overly static No-Action condition can artificially inflate the project's apparent benefits and minimize its incremental impacts. Because every technical chapter compares With-Action against No-Action, this flaw can propagate through the entire DEIS.

Requested correction / action:

City Planning should require the applicants to explain, with much greater rigor, why “existing conditions remain” is the appropriate No-Action scenario for the Development Site through 2031, and whether other plausible No-Action futures should also be disclosed or tested.

Comment 12: The Project Description improperly treats the future of Box Street Park as a project benefit even while disclaiming applicant control

Chapter / Section: Chapter 1, NYCTA Relocation Site and ERU Site / Open Space and Public Realm Improvements / Project Purpose and Need

DEIS Claim / Statement:

“While the relocation of the ERU Facility would allow for the full realization of the City's proposed Box Street Park... the Applicants have no control over what will be developed at this location in the future or the timing of any future improvements.”

“In addition to the on-site open space, the relocation of the NYCTA ERU Facility ... would facilitate the full realization of the City's planned Box Street Park, adding an additional approximate 25,000 sf of off-site open space to the park.”

“By facilitating the relocation ... the Proposed Actions would also allow for the full realization of Box Street Park by the City.”

Response:

These statements are materially inconsistent. The chapter repeatedly advertises the future realization of Box Street Park as a major public benefit of the Proposed Actions, while also acknowledging that the applicants do not control what will happen on that site or when it will happen. That kind of contingent future outcome should not be presented as though it were a delivered project component. At most, it is a possible collateral consequence of the ERU relocation. It may be relevant background, but it is not the same thing as a committed project-generated improvement.

This matters especially because the Box Street Park narrative is used not just as an incidental observation, but as part of the project's policy and public-benefit justification. CEQR requires

adequate and accurate project description. A project description that repeatedly credits the applicants with an off-site future park outcome, while disclaiming control over that same outcome, risks overstating benefits and understating uncertainty.

Why this matters:

Public benefits should be presented with the degree of certainty they actually possess. Treating contingent future park expansion as if it were a direct, committed project benefit can skew public understanding and agency balancing.

Requested correction / action:

City Planning should require the applicants to revise Chapter 1 so that Box Street Park is described as a contingent off-site future possibility unless and until the applicants can show that the relevant public actions are sufficiently committed and reasonably certain to occur on a known schedule.

Comment 13: The chapter does not adequately justify using removal of the park identification on Lot 25 to generate substantial additional development rights.

Chapter / Section: Chapter 1, Description of Required Approvals / City Map Amendment

DEIS Claim / Statement:

“The elimination of the park identification would allow for the construction of the publicly accessible landscaped open space and the long-planned Greenpoint Monitor Museum in place of vacant land. The proposed City Map amendment and related zoning map and text amendments would generate **367,228 zsf on Lot 25, allowing for the construction of roughly 120 additional affordable DUs in the Proposed Development.**”

Response:

This is one of the most consequential statements in Chapter 1, and it is presented too casually. The chapter describes the City Map amendment as if it were simply a technical step needed to facilitate landscaped public access and the long-planned museum. But it also acknowledges that the same action would generate 367,228 zoning square feet on Lot 25, enabling roughly 120 additional affordable dwelling units within the larger Proposed Development. That is not a minor administrative consequence. **It is a major land-use and development-rights consequence tied to the removal of a park identification from a waterfront parcel adjacent to Bushwick Inlet Park.**

At a minimum, the Project Description should describe this tradeoff more candidly. The issue is not only whether NYC Parks intends to acquire the property. The issue is whether removing the park identification from this parcel is being used, in part, as a mechanism to increase the development capacity of the overall project. That is a core public-policy and alternatives issue that should be disclosed plainly in Chapter 1 rather than obscured within approval mechanics. The chapter’s current wording understates the significance of the City Map amendment by

foregrounding museum and landscaped-access purposes while only secondarily disclosing the development-rights gain.

Why this matters:

This action goes directly to how the project’s bulk is assembled. If the City Map amendment on Lot 25 materially contributes to tower density elsewhere in the development, that should be transparent at the outset because it bears on alternatives, land use, open space, and the public’s understanding of what is being traded for what.

Requested correction / action:

City Planning should require the applicants to revise Chapter 1 to describe more explicitly:

1. how the removal of the park identification on Lot 25 contributes to the project’s overall development rights and unit yield;
2. where that added floor area is functionally being realized; and
3. why this public-policy tradeoff was selected over other possible configurations or public-land outcomes.

Comment 14: The relocation of NYCTA operations to the North Brooklyn IBZ is described as an uncomplicated benefit, without adequate acknowledgment of the off-site tradeoffs it creates

Chapter / Section: Chapter 1, Introduction / NYCTA Relocation Site / Project Purpose and Need

DEIS Claim / Statement:

“The NYCTA Relocation Site, located in the North Brooklyn Industrial Business Zone (IBZ) in East Williamsburg, would be redeveloped...”

“As part of the Proposed Development, the Project Developer has identified a relocation site in the North Brooklyn IBZ in East Williamsburg and would construct a new turnkey facility for the relocation of the NYCTA operations...”

“The Proposed Actions would provide numerous benefits to the community...”

Response:

The Project Description treats the NYCTA relocation largely as an enabling step and a benefit, but it does not squarely acknowledge that the proposal also shifts project burdens to a separate industrial area and raises its own land-use and policy questions there. CEQR does not forbid that outcome, but Chapter 1 should describe it more candidly. The fact that the relocation site is within the North Brooklyn IBZ may support industrial compatibility, but it does not eliminate the need to present the relocation as a real component of the project with real off-site consequences, rather than merely as a convenient solution to unlock waterfront redevelopment.

This matters because the relocation site is part of the Affected Area and is one of the core reasons the project can proceed at all. Yet the chapter's narrative is overwhelmingly written from the perspective of benefits at Quay Street. A more balanced Project Description would acknowledge that the project also depends on re-siting industrial transit operations within an IBZ and that the environmental review must therefore evaluate the relocation site as a meaningful part of the action, not a background implementation detail. CEQR's project description requirements are intended to ensure that decision-makers understand the full action being facilitated, including its off-site components.

Why this matters:

The relocation site is not incidental. It is a structural element of the project's feasibility, and it should be described in a way that makes clear that the project's impacts and tradeoffs are not confined to Quay Street.

Requested correction / action:

City Planning should require the applicants to revise Chapter 1 so that the NYCTA Relocation Site is described not only as a compatible industrial destination, but also as a material component of the overall action whose separate land-use, transportation, and neighborhood implications must be fully evaluated.

Comment 15: The Project Description front-loads asserted benefits and advocacy language in a way that weakens objective framing.

Chapter / Section: Chapter 1, Introduction / Project Purpose and Need

DEIS Claim / Statement:

"The Proposed Actions would provide numerous benefits to the community..."

"The Proposed Development seeks to transform an underutilized and industrial segment of the Greenpoint-Williamsburg waterfront into a mixed-use, vibrant community hub..."

Response:

Chapter 1 reads at points more like a project advocacy statement than a neutral project description. Words such as "vibrant," "enhance," "benefits," and "community hub" may be understandable from an applicant perspective, but they should be used carefully in a DEIS chapter whose purpose is to establish the factual and analytical frame for environmental review. The issue is not whether the applicants believe the project has benefits; the issue is that the Project Description should present the proposal in a sufficiently neutral manner that later technical chapters can be evaluated on their merits.

This is not a purely stylistic concern. When the introductory chapter is saturated with benefit language, it can subtly predetermine the reader's understanding of later disputes over open space, public policy, alternatives, neighborhood character, and environmental tradeoffs. A Project Description should identify the project, its approvals, its physical characteristics, and its stated objectives clearly. It should not repeatedly present disputed public-policy conclusions as though they were established facts before the substantive chapters are even reached.

Why this matters:

The Project Description is the gateway chapter. If it is written in advocacy-oriented terms, it risks framing the entire review in favor of the preferred project before the technical analyses are examined.

Requested correction / action:

City Planning should require the applicants to revise Chapter 1 so that it uses more neutral descriptive language and distinguishes more carefully between:

1. factual project attributes;
2. stated sponsor objectives; and
3. claimed public benefits that remain subject to environmental review and agency judgment.

Comments on DEIS Chapter 20 – Alternatives

Under CEQR and SEQRA, the alternatives chapter is not supposed to be a formality or a rhetorical defense of the sponsor's preferred scheme. It is supposed to test a **range of reasonable alternatives** at a level detailed enough for **comparative assessment**, including the No-Action Alternative and, where appropriate, alternatives involving different **scale, design, timing, use, or type of action**. CEQR also makes clear that the size of the proposed project should **not** itself be treated as an essential objective that precludes consideration of a smaller-scale or lesser-density alternative.

Comment 16: The Alternatives chapter defines the choice set too narrowly and fails to evaluate a meaningful range of reasonable alternatives.

Chapter / Section: Chapter 20, Introduction / Alternatives Considered

DEIS Claim / Statement:

“This chapter considers the following three alternatives to the Proposed Actions:
› A No-Action Alternative...
› An Existing Zoning Alternative...
› A No Unmitigated Significant Adverse Impacts Alternative...”

Response:

This is too narrow a choice set for a publicly controlled waterfront site with multiple discretionary actions, a co-applicant public landowner, a City Map amendment, and a project that itself relies heavily on claims of public purpose. The chapter offers only three alternatives: a static No-Action scenario, a stripped-down Existing Zoning Alternative, and a No Unmitigated Significant Adverse Impacts Alternative that is essentially a transportation sensitivity exercise.

It does not evaluate any smaller-scale but still mixed-income alternative, any alternative

design or configuration, any partial-development / partial-public-space scenario, any phasing alternative, or any other alternative use that could reduce impacts while still advancing some combination of housing, shoreline access, resiliency, museum, or public benefit goals.

That omission is especially important here because the MTA is not just a passive owner; it is a co-applicant and public landowner. The DEIS therefore cannot persuasively treat the applicants' preferred redevelopment concept as though it were the only serious option worth studying. CEQR does not require every imaginable alternative. But it does require a **range of reasonable alternatives**, and for a project of this nature the chapter should have examined more than one lower-density option and more than one way of configuring public-land outcomes.

Why this matters:

An alternatives chapter that begins with an artificially narrow universe of options risks turning CEQR review into a comparison between the sponsor's preferred scheme and a set of weak foils, rather than a genuine test of whether other feasible approaches could reduce or avoid impacts.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 20 with additional reasonable alternatives, including at minimum:

1. a smaller-scale or lesser-density alternative;
2. an alternative design / configuration alternative;
3. a phased alternative; and
4. an alternative public-land use or partial-development / partial-public-open-space alternative appropriate to a publicly controlled site.

Comment 17: The No-Action Alternative is framed as a static status quo and as the absence of all public benefits, rather than as a rigorous reasonably foreseeable baseline

Chapter / Section: Chapter 20, Principal Conclusions / No-Action Alternative / Description of the No-Action Alternative

DEIS Claim / Statement:

"Under the No Action Alternative, the relocation of the existing NYCTA Facility and ERU Site would not occur and existing conditions would remain on the Development Site."

"Under the No-Action Alternative, the goals and objectives of the Proposed Actions would not be met."

"The No-Action Alternative would not provide for any new housing, including much-needed affordable housing, nor would it provide any public realm benefits..."

“As such, in the No-Action Alternative, it is assumed that the existing conditions would remain on the Development Site, NYCTA Relocation Site, and ERU Site.”

Response:

This is not a sufficiently rigorous or neutral No-Action framing. CEQR requires the No-Action Alternative to evaluate the adverse or beneficial site changes likely to occur in the reasonably foreseeable future in the absence of the proposed action. **It is not supposed to function as a rhetorical foil that simply lists everything the sponsor says the project would provide and then declares that none of it would occur without the project.**

Here, the chapter repeatedly frames No Action as a frozen continuation of existing conditions across the Development Site, NYCTA Relocation Site, and ERU Site, while simultaneously using that static scenario to dramatize the loss of housing, affordability, waterfront access, shoreline work, museum space, Box Street Park progress, and NYCTA investment. But the chapter does not adequately explain why that is the only reasonable No-Action future for a site that is already partly residentially zoned, publicly controlled in part, and subject to multiple possible public and private pathways. Nor does it grapple with the difference between benefits that are actually tied to the Proposed Actions and benefits that are merely claimed by the applicants.

The No-Action discussion is especially problematic in its treatment of the ERU Site and Box Street Park. The chapter assumes that without the Proposed Actions the ERU relocation would not occur and “that site would not be available for the full development of the City’s planned Box Street Park.” That may be one possible future, but the DEIS does not demonstrate that it is the only reasonably foreseeable one. A CEQR baseline should not be narrowed by embedding the applicants’ preferred deal structure into the definition of what “No Action” means.

Why this matters:

Every technical chapter compares With-Action to No-Action. If No Action is framed too narrowly or too statically, the project’s benefits appear larger and its incremental burdens appear smaller. That can distort the entire environmental review.

Requested correction / action:

City Planning should require the applicants to revise the No-Action discussion so that it more rigorously analyzes reasonably foreseeable site changes absent the Proposed Actions, and distinguishes between:

1. truly likely No-Action site conditions;
2. contingent public benefits claimed by the applicants; and
3. other plausible future conditions that may reasonably occur without the full Proposed Actions.

Comment 18: The Existing Zoning Alternative is a straw-man alternative because it is defined to strip out nearly all public-benefit and Lot 25 components rather than testing a serious lower-impact redevelopment option.

DEIS Claim / Statement:

“The Existing Zoning Alternative assumes that the Applicants would seek MTA Board Approval ... and that subsequent development on the Development Site would be undertaken pursuant to the existing R6 and R6/C2-4 zoning district. **Lot 25 would remain in its existing condition.**”

“This alternative would include approximately 280 market-rate DUs and approximately 10,000 gsf of local retail space.”

“The Existing Zoning Alternative would not provide any affordable housing, and would not provide some of the public realm benefits of the Proposed Development, including a new Shore Public Walkway, long-term funding to the City/NYC Parks ... and development of the Greenpoint Monitor Museum...”

“Open Space and Resiliency ... Limited green space / No waterfront access / No shoreline restoration.”

Response:

This is not a meaningful test of a lower-impact alternative; it is a heavily stripped-down scenario designed to look inferior to the Proposed Development on virtually every public-interest dimension. The chapter assumes that under existing zoning, Lot 25 would remain untouched, there would be no affordable housing, no museum, no waterfront access, no shoreline restoration, no public-realm funding, and no significant public improvements beyond an upland connection and NYCTA replacement facility. That is not a neutral exercise in comparative assessment. It is a highly constrained conception of what a lower-density alternative is “allowed” to be.

The problem is not that the Existing Zoning Alternative provides fewer units. The problem is that the DEIS defines the alternative so narrowly that it excludes nearly every element that might make a smaller-scale public-land redevelopment more viable or publicly beneficial.

The chapter does not meaningfully test whether there could be a lesser-density project with some affordability, some form of shoreline stabilization or public access, some different use of Lot 25, or some alternative configuration that reduces impacts while still advancing several project objectives.

CEQR expressly contemplates alternatives involving different scale, design, timing, and use. An alternatives chapter should not be structured so that the only lower-density option is one with virtually all public benefits removed by assumption.

This is particularly important because the MTA’s role as public owner and co-applicant suggests a broader reasonable-alternatives universe than the chapter acknowledges.

The Existing Zoning Alternative is therefore not just smaller; it is artificially deprived of tools, uses, and public-purpose components that make it easier for the DEIS to dismiss.

Why this matters:

An alternative cannot meaningfully illuminate the tradeoffs of the Proposed Actions if it is built as a weak foil from the outset. CEQR requires comparative assessment, not a deliberately impoverished comparison case.

Requested correction / action:

City Planning should require the applicants to analyze a serious lesser-density alternative that does **not** simply freeze Lot 25 and eliminate virtually all public-benefit elements by assumption. At minimum, the DEIS should test whether a smaller-scale redevelopment could still include some combination of affordability, shoreline work, public access, museum/community-facility space, or other public uses.

Comment 19: The Existing Zoning Alternative analysis is internally inconsistent because it acknowledges major reductions in bulk and trip generation while still treating impacts as broadly similar without adequate explanation

Chapter / Section: Chapter 20, Existing Zoning Alternative / Transportation / Shadows / Construction / Neighborhood Character

DEIS Claim / Statement:

“The Existing Zoning Alternative would have a much smaller development program compared to the Proposed Development.”

“The Existing Zoning Alternative would generate between approximately 75 percent to 76 percent fewer person trips... 72 percent to 75 percent fewer pedestrian trips, and between 74 percent to 79 percent fewer vehicle trips.”

“Shadows from the Existing Zoning Alternative buildings would be smaller than under the Proposed Actions and incremental shadow durations and coverage ... would be less...”

“The Existing Zoning Alternative could result in significant adverse impacts similar to those of the Proposed Actions...”

“The construction of the Existing Zoning Alternative would result in a reduction in the duration of construction but not the level of activities (intensity)...”

Response:

The chapter repeatedly acknowledges that the Existing Zoning Alternative would be materially smaller: far fewer units, far less retail, shorter buildings, smaller shadows, fewer person trips, fewer pedestrian trips, and many fewer vehicle trips. Yet it still repeatedly suggests that this alternative could have impacts “similar” to the Proposed Actions or that many of the same concerns would still arise. That may be true in some respects, but the chapter does not

adequately explain where the impacts would truly remain similar, where they would be reduced, and by how much.

That is a problem because an alternatives chapter is supposed to permit a **comparative assessment**. If the alternative materially reduces height, bulk, trip generation, and population, then the chapter should be explicit about what that means for the magnitude, duration, and likelihood of impacts—not merely state that the alternative might still exceed screening thresholds or might still have “similar” impacts in some categories. The current presentation tends to collapse important gradations, which makes the preferred project appear less distinguishable from the smaller alternative than the underlying numbers suggest.

Why this matters:

A meaningful alternatives chapter should help decision-makers understand tradeoffs. If a materially smaller alternative is described in a way that obscures the degree to which it might reduce impacts, the chapter does not fully serve that function.

Requested correction / action:

City Planning should require the applicants to present a more transparent comparative analysis of the Existing Zoning Alternative, including where and how impact intensity, geographic extent, duration, or significance would be reduced relative to the Proposed Actions.

Comment 20: The “No Unmitigated Significant Adverse Impacts Alternative” is not a genuine land-use alternative; it is a one-intersection transportation sensitivity exercise presented as a dispositive policy conclusion

Chapter / Section: Chapter 20, No Unmitigated Significant Adverse Impacts Alternative / Transportation

DEIS Claim / Statement:

“A sensitivity analysis was conducted at key intersections within the study area to determine the minimum level of travel demand that would result in any unmitigable transportation-related significant adverse impacts.”

“This analysis determined that the addition of just three inbound project-generated vehicles ... at the intersection of Franklin Street and Quay Street during the weekday PM peak hour would result in a significant adverse traffic impact that could not be mitigated.”

“The Proposed Development would need to be reduced to just 45 residential DUs... or to 1,400 gsf of local retail space...”

“Therefore, to avoid any unmitigable transportation-related impact, the Proposed Development’s program would have to be substantially reduced below the thresholds described above or the Development Site would have to remain in its existing condition.”

Response:

This is not a genuine CEQR alternatives analysis. It is a sensitivity test centered on one transportation constraint, at one key location, translated into a sweeping conclusion that the project would have to shrink to 45 dwelling units or effectively remain as-is. That is analytically too narrow. A transportation sensitivity analysis may be useful, but it is not a substitute for a real alternative involving different scale, design, access, circulation, parking, phasing, or program.

CEQR's alternatives framework expressly contemplates alternatives involving **scale or magnitude, design, timing, use, and type of action**. The Technical Manual also explains that alternatives may include **changes in access and circulation** that reduce impacts without simply eliminating the project. Yet the chapter does not appear to test whether traffic and pedestrian impacts could be reduced through a different site plan, different parking/loading strategy, different trip distribution, altered access points, changed circulation patterns, or a differently phased program. Instead, it uses a one-intersection threshold finding to claim that almost any meaningful development would be environmentally unacceptable.

That is especially problematic because the chapter itself recognizes another alternative—the Existing Zoning Alternative—that would generate approximately 74 to 79 percent fewer vehicle trips than the Proposed Development. A serious alternatives analysis should not leap from “three inbound vehicles trigger an unmitigable traffic impact” to “therefore meaningful lower-density alternatives are not feasible” without testing a fuller set of design and circulation responses.

Why this matters:

This framing makes the transportation model, rather than CEQR's broader alternatives logic, dictate the public policy conclusion. That risks converting one narrow operational bottleneck into a rationale for foreclosing a wide range of potentially feasible lower-impact alternatives.

Requested correction / action:

City Planning should require the applicants to supplement the No Unmitigated Significant Adverse Impacts Alternative with genuine land-use and site-planning alternatives, including alternatives that test different access, circulation, parking/loading, phasing, and configuration assumptions rather than only gross program reduction.

Comment 21: The chapter improperly treats the applicants' preferred density as the prerequisite for public benefits, contrary to CEQR's alternatives logic

Chapter / Section: Chapter 20, No Unmitigated Significant Adverse Impacts Alternative / Principal Conclusions

DEIS Claim / Statement:

“Without the density introduced by the Proposed Actions, it would not be feasible to deliver the intended community benefits, including the development of affordable housing and 50,000 sf of proposed new open space, the development of the Monitor

Museum, and associated shoreline restoration and resiliency measures, or any long-term investment in Bushwick Inlet Park or NYCTA infrastructure.”

“Therefore, no practicable alternative could be developed to avoid this temporary construction noise impact without substantially compromising the Proposed Development’s purpose and need.”

Response:

This is one of the chapter’s most consequential analytical moves, and it is not adequately justified. The DEIS repeatedly treats the applicants’ preferred density as though it were the necessary price of obtaining any meaningful public benefits. That is exactly the sort of reasoning CEQR warns against. The Technical Manual states that while alternatives should consider the sponsor’s objectives and capabilities, “the size or scale of the project as defined by the proposed project should not be considered an essential objective ... precluding consideration of a smaller size or lesser density as a reasonable alternative.”

The chapter does not actually demonstrate that affordable housing, waterfront access, shoreline restoration, museum/community facility space, or some level of public investment are impossible below the preferred density. It simply asserts that they are not feasible without the proposed bulk. On a publicly controlled site with a co-applicant public owner, that assertion requires far more scrutiny than the chapter provides. It may be true that some specific package of benefits cannot be delivered at the exact same magnitude. But CEQR does not ask whether every sponsor-defined benefit can be maximized simultaneously. It asks whether reasonable alternatives could reduce or avoid impacts while still meeting **some or all** project goals and objectives.

Similarly, the statement that “no practicable alternative” could avoid temporary construction noise without substantially compromising purpose and need is too conclusory as written. CEQR alternatives can include changes in phasing, timing, design, or configuration. The chapter does not show that those possibilities were seriously tested before reaching such a broad conclusion.

Why this matters:

If the DEIS treats the proposed density as the prerequisite for any serious public benefit, the alternatives chapter becomes self-fulfilling. The result is not a genuine environmental comparison, but a defense of a predetermined development concept.

Requested correction / action:

City Planning should require the applicants to revise Chapter 20 so that it does not equate the applicants’ preferred density with the feasibility of all public benefits. The DEIS should instead test whether different scales, configurations, phasing approaches, and use mixes could still deliver meaningful housing, affordability, shoreline, cultural, and public-space benefits while reducing impacts.

Comment 22: The Alternatives chapter relies too heavily on claimed project benefits and not enough on comparative environmental analysis

Chapter / Section: Chapter 20, Principal Conclusions / No-Action Alternative / Existing Zoning Alternative

DEIS Claim / Statement:

“The No-Action Alternative would not provide for any new housing, including much-needed affordable housing, nor would it provide any public realm benefits...”

“The Existing Zoning Alternative could result in significant adverse impacts similar to those of the Proposed Actions; however, it would provide for significantly less housing and no affordable housing. Further, many of the intended public benefits of the Proposed Actions would not be realized...”

Response:

The chapter repeatedly measures alternatives primarily by the extent to which they fail to reproduce the applicants’ preferred package of benefits, rather than by the extent to which they might reduce or avoid environmental impacts. Of course CEQR allows the project sponsor’s objectives and claimed benefits to be considered. But the alternatives chapter should remain, above all, a comparative environmental analysis. Here, the narrative repeatedly emphasizes what alternatives do **not** provide—fewer units, no museum, less open space, less funding, fewer benefits—while often giving much less attention to what those alternatives might do better environmentally.

That imbalance is especially visible where the chapter describes the Existing Zoning Alternative and No-Action Alternative in terms of foregone benefits almost immediately, while the discussion of reduced bulk, reduced height, reduced trip generation, and reduced shadow conditions is less developed and more fragmented. A balanced alternatives chapter should not read as if the principal test is whether an alternative fully satisfies the applicants’ preferred redevelopment agenda. It should help decision-makers weigh environmental tradeoffs openly and honestly.

Why this matters:

An alternatives chapter that foregrounds sponsor benefits more than environmental comparison risks undermining the purpose of the EIS itself. The public and City Planning need a clear record of tradeoffs, not a repeated explanation of why the preferred project is best at delivering what the applicants already wanted to deliver.

Requested correction / action:

City Planning should require the applicants to rebalance Chapter 20 so that each alternative is evaluated more transparently in terms of comparative environmental outcomes—including reductions in bulk, trips, shadows, and construction intensity—rather than primarily through the lens of lost sponsor-defined benefits.

Comments on DEIS Chapter 2 – Land Use, Zoning, and Public Policy

Chapter 2 is important because it is where the DEIS makes one of its broadest threshold judgments: that this very large waterfront redevelopment, together with its public-land actions, special permits, City Map amendment, and off-site facility relocation, creates **no significant adverse land use, zoning, or public policy issues**. Where that chapter is framed too narrowly or too selectively, the DEIS can prematurely foreclose exactly the kinds of policy and compatibility questions City Planning is supposed to examine.

Comment 23: The chapter relies on an unduly narrow study area and excludes the ERU Site even while the applicants rely on that site to justify the project’s public-policy benefits

Chapter / Section: Chapter 2, Methodology / Study Area Definition / Introduction

DEIS Claim / Statement:

“For this assessment, two study areas are used: a study area of a quarter mile surrounding the Development Site and a separate study area of 400 feet surrounding the NYCTA Relocation Site. **Since the Proposed Actions would not directly affect land use or zoning on the ERU Site, it is not included in the assessment.**”

“The relocation of the ERU Facility ... would create a fully vacant site at Commercial Street, which would facilitate the full realization of the City’s planned Box Street Park by allowing for an additional 25,000 sf of publicly accessible open space at the ERU Site.”

Response:

This is too selective an analytical frame. The chapter excludes the ERU Site from the land use and public policy assessment on the ground that the Proposed Actions do not “directly affect” zoning or land use there, yet the DEIS repeatedly relies on the future vacancy of that site and the claimed advancement of Box Street Park as a major public benefit of the Proposed Actions. Those two positions are not analytically comfortable together. If the ERU Site is sufficiently connected to the project to be invoked as part of the project’s public-policy case, then its treatment should be more transparent and more rigorous in this chapter.

The same problem appears in the study area size. The chapter notes that CEQR study areas for land use, zoning, and public policy can range “from 200 feet for a small project to 0.5 mile for a very large project,” yet the Development Site analysis uses only a quarter-mile study area for a project that includes approximately 1.215 million gsf, towers up to approximately 600 feet and 450 feet, a waterfront public access system, a City Map amendment removing park identification, and relocation of critical public facilities. The chapter does not explain why the lower end of the range is appropriate for this particular waterfront and public-policy case.

Why this matters:

A narrow study area and selective exclusion of connected sites can make compatibility and policy questions appear simpler than they are. That is especially consequential where the applicants rely on off-site public-benefit claims to support the project.

Requested correction / action:

City Planning should require the applicants to:

1. explain why a quarter-mile land use/public policy study area is sufficient for this very large waterfront project;
2. clarify how the ERU Site is being treated for policy-analysis purposes; and
3. either expand the analysis to address the ERU Site's role more directly or stop relying on the future of that site as a major claimed policy benefit of the Proposed Actions.

Comment 24: The chapter's compatibility conclusion is overly broad and selectively framed, especially with respect to bulk, density, and adjacency to Bushwick Inlet Park

Chapter / Section: Chapter 2, Principal Conclusions / With-Action Condition / Land Use and Zoning

DEIS Claim / Statement:

"The increased bulk and density facilitated by the Proposed Actions would be compatible with the existing bulk and building densities along the waterfront in the study area."

"The Proposed Actions would not conflict with the surrounding zoning or existing uses. Rather, the Proposed Actions would facilitate development that would integrate well with the current built environment and the existing zoning framework within the study areas."

Response:

These conclusions are too categorical for the record described in the chapter. The site is not simply another generic stretch of waterfront. It sits immediately adjacent to Bushwick Inlet Park, includes Lot 25 and the former Quay Street area currently associated with future park/open-space logic, and introduces towers of approximately 600 feet, 450 feet, and 230 feet on a site that the chapter itself describes as part of a rapidly changing area where open space is concentrated along the waterfront and lower-scale residential neighborhoods remain nearby inland. A compatibility conclusion this broad needs more than a generalized reference to "ongoing trend."

The chapter's compatibility logic is also selective. It emphasizes recently completed or planned waterfront mixed-use projects, but does not meaningfully grapple with the project's immediate adjacency to future Bushwick Inlet Park, with the role that open-space edge conditions play in land use compatibility, or with the degree to which the requested actions are being used to produce a scale of development substantially beyond what current zoning would otherwise support. Simply pointing to other waterfront development does not resolve whether this particular concentration of bulk is appropriate at this park edge and public waterfront location.

Why this matters:

Land use compatibility is not just about whether housing exists somewhere else on the waterfront. It is about whether this project's scale, form, and location fit the specific

surrounding conditions and planning context of this site. A conclusory “compatible” finding can obscure that analysis.

Requested correction / action:

City Planning should require the applicants to revise Chapter 2 to more specifically analyze compatibility in relation to:

1. the project’s immediate adjacency to Bushwick Inlet Park and the future park edge;
2. the project’s exceptional waterfront bulk and height; and
3. the distinction between a general trend of waterfront redevelopment and the compatibility of this particular project at this particular location.

Comment 25: The zoning analysis is circular because it treats the need for major waivers and map/text changes as proof of compatibility rather than as evidence of a substantial policy tradeoff

Chapter / Section: Chapter 2, Zoning / Principal Conclusions / Public Policy

DEIS Claim / Statement:

“The proposed special permits for a large-scale general development pursuant to Section 74-743 would allow for waivers to height and setback, waterfront yard, and loading...”

“The proposed zoning map amendment, zoning text changes, and special permit are necessary to facilitate the Proposed Development and are consistent with the objectives of waterfront zoning and the MIH program. **The Proposed Actions would ensure the proposed site plan would maximize the residential development potential of the site**, allow for development of the Monitor Museum, and create significant public open space along the waterfront. Therefore, the Proposed Actions would not result in a significant adverse impact to zoning.”

Response:

This reasoning is circular. The chapter acknowledges that the project depends on major discretionary interventions: rezoning, text amendments, Large-Scale General Development waivers, waterfront-yard modifications, loading waivers, and related actions. It then treats the fact that those actions can be requested as proof that the resulting development is compatible with zoning and waterfront policy. That skips over the actual question. The need for extensive waivers and amendments does not itself establish compatibility; it underscores that the applicants are asking City Planning to make a substantial policy choice.

The quoted language is especially revealing because it states that the Proposed Actions would “maximize the residential development potential of the site.” That is not a neutral zoning compatibility criterion. It is an applicant objective. In a CEQR context, a chapter on zoning and public policy should candidly explain the tradeoffs created by using map changes, text changes, park-boundary revisions, and special-permit waivers to maximize residential yield on

this waterfront site. It should not collapse those tradeoffs into a conclusory “therefore no zoning impact” statement.

Why this matters:

The zoning chapter should help decision-makers understand what the applicants are asking the City to waive, modify, and re-map, and why those choices matter. If the chapter treats those actions as self-justifying, it weakens meaningful review of the policy choices embedded in the proposal.

Requested correction / action:

City Planning should require the applicants to revise the zoning analysis so that it:

1. distinguishes between what current zoning permits and what the Proposed Actions newly enable;
2. explains the policy tradeoffs created by the requested waivers and amendments; and
3. avoids treating “maximizing residential development potential” as itself proof of zoning compatibility.

Comment 26: The public-policy analysis is one-sided and cherry-picks supportive policies without meaningfully grappling with competing waterfront, park, and public-land policy considerations

Chapter / Section: Chapter 2, Principal Conclusions / Public Policy / Housing Our Neighbors / Where We Live NYC / OneNYC 2050 / WRP

DEIS Claim / Statement:

“The Proposed Actions would be in line with the goals of several local public policies...”

“The Proposed Actions would support Goal 3 of OneNYC 2050: Thriving Neighborhoods...”

“The Proposed Actions would be consistent with this policy, and there would be no significant adverse impacts.”

Response:

The policy discussion is too one-directional. It repeatedly identifies policies that can be read in support of more housing, affordability, industrial relocation, resiliency, and waterfront access, and then concludes that the project is therefore “consistent” with applicable public policies. But it does not meaningfully grapple with competing policy considerations that are also central to this site: the role of Bushwick Inlet Park and open-space needs, the implications of removing park identification from Lot 25 and the former Quay Street, the public-land nature of key site components, the balance between waterfront access requirements and true park/open-space function, and the tensions between maximizing residential yield and preserving public waterfront options.

A public-policy chapter should not function as a checklist in which every broadly pro-housing or pro-resiliency policy is treated as support for the project, while policies and planning principles that cut the other way are minimized or omitted. A project can advance some policies while creating tension with others. The chapter's current structure does not seriously engage those tensions. That is especially troubling here because the proposed actions include both a City Map amendment to remove park identification and special waterfront zoning actions whose public-policy implications are precisely what the chapter is supposed to examine.

Why this matters:

Land use and public policy review is supposed to illuminate tradeoffs, not flatten them. A one-sided policy analysis can make a contentious project appear consistent by definition, rather than showing where City Planning must actually weigh competing goals.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 2 so that it addresses not only policies the project advances, but also the policies and planning principles with which the project may be in tension, including open-space, park-edge, public-land, and waterfront tradeoffs.

Comment 27: The Greenpoint-Williamsburg Waterfront Access Plan consistency analysis overstates the project's public-space benefit and glosses over the role of required access areas and park-boundary changes

Chapter / Section: Chapter 2, Public Policy – Greenpoint-Williamsburg Waterfront Access Plan

DEIS Claim / Statement:

“The Proposed Development would include approximately 50,000 sf of open space including an approximately 34,000 sf WPAA, and approximately 9,000 sf of PAA...”

“The Proposed Development represents an opportunity to connect Bushwick Inlet Park ... creating a fully continuous public waterfront and **fulfilling the WAP**. Therefore, the Proposed Actions would be consistent with this policy, and there would be no significant adverse impacts.”

Response:

This conclusion is overstated. The chapter treats the project's approximately 50,000 sf of “open space” as a clear policy win under the Waterfront Access Plan, but that number includes substantial areas of required public access infrastructure, including WPAA and PAA space, rather than independently discretionary parkland. The chapter also does not squarely acknowledge that the project's WAP-based public access configuration is intertwined with requested actions that include removing the park identification from Lot 25 and the former Quay Street and obtaining special permits to modify waterfront controls. In that context, “fulfilling the WAP” is too strong and too simplified a conclusion.

The issue is not whether the project provides some new public access. It does. The issue is whether the chapter overstates that fact by conflating required waterfront access areas with broader public open-space or park benefits, and by failing to confront the policy tradeoff involved in reconfiguring a site that has long been closely tied to future park and waterfront-continuity expectations. A more rigorous chapter would distinguish between:

1. required public-access compliance elements;
2. truly additional public-space benefits; and
3. the policy costs of the accompanying map, zoning, and bulk actions.

Why this matters:

The WAP is one of the key public-policy frameworks for this site. If the chapter treats compliance-oriented waterfront access features as dispositive proof of policy consistency, it risks overstating the public-space benefit of the project and understating the associated land-use tradeoffs.

Requested correction / action:

City Planning should require the applicants to revise the WAP discussion so that it:

1. distinguishes required WPAA/PAA components from broader public open-space claims;
2. explains how the project’s WAP consistency is affected by the requested park-boundary and zoning changes; and
3. avoids conclusory language that the project “fulfills” the WAP without a fuller discussion of these tradeoffs.

Comment 28: The chapter treats the NYCTA relocation as straightforwardly policy-consistent while understating the fact that the project shifts burdens and dependencies to another site

Chapter / Section: Chapter 2, Public Policy – Industrial Business Zones / NYCTA Relocation Site

DEIS Claim / Statement:

“The Proposed Actions would not affect any properties located within the IBZ.”

“The new facility would be consistent with the goals and objectives of the North Brooklyn Industry and Innovation Plan...”

“Therefore, the Proposed Actions would be consistent with this policy and would not cause a significant adverse impact.”

Response:

This discussion is incomplete as written. It is certainly relevant that the NYCTA Relocation Site is within the North Brooklyn IBZ and that transportation/utility uses may be appropriate there. But the chapter presents that point as though it fully resolves the land use and public-policy question. It does not. The relocation site is not incidental; it is a structural enabling component

of the waterfront redevelopment. The project depends on shifting transit operations away from Quay Street and consolidating them elsewhere. That means the public-policy analysis should present the relocation as a real project tradeoff, not just as a policy-consistent background benefit.

The statement that the Proposed Actions “would not affect any properties located within the IBZ” is also too neat. The relocation site itself is within the North Brooklyn IBZ, and it is plainly being affected by the project through redevelopment into a 143,000-gsf turnkey NYCTA facility. The better point would be that the relocation use may be compatible with IBZ policy goals—not that the project does not affect IBZ properties. As written, the phrasing minimizes the extent to which the proposed waterfront redevelopment depends on off-site industrial siting decisions.

Why this matters:

A serious public-policy review should illuminate where the project’s benefits at one site depend on burdens, dependencies, or land-use shifts at another. That is especially important when a public agency is both co-applicant and operator of the relocated facility.

Requested correction / action:

City Planning should require the applicants to revise the IBZ discussion so that it:

1. acknowledges more clearly that the project does, in fact, rely on redevelopment of an IBZ site;
2. explains the policy tradeoffs of that relocation more candidly; and
3. analyzes the relocation site as a substantive component of the overall public-policy balance, not merely as a compatible destination.

Comment 29: The chapter’s conclusion that no further assessment is needed appears too cursory for a project of this scale and public-policy complexity

Chapter / Section: Chapter 2, Methodology / Principal Conclusions

DEIS Claim / Statement:

“If the Proposed Actions could conflict with the identified policies, a detailed assessment would be conducted; or
If the Proposed Actions are found to not conflict with the identified policies, no further assessment is needed.”

“Therefore, the Proposed Actions would be consistent with applicable public policies.”

Response:

The chapter’s methodology is formally consistent with the CEQR preliminary-assessment framework, but the way it is applied here appears too cursory. This is not a modest infill project. It is a very large waterfront redevelopment involving new towers, a City Map amendment removing park identification, special waterfront and LSGD actions, public access and shoreline claims, off-site relocation of NYCTA functions, and repeated reliance on broader

public-benefit narratives. In that context, the existence of genuine policy tensions is not hard to identify. Yet the chapter repeatedly resolves those tensions through broad conclusions of consistency and then stops there.

A preliminary assessment can be appropriate, but it still has to meaningfully test conflict, tension, and compatibility. Here, the chapter's repeated "therefore ... no significant adverse impacts" conclusions often read more like advocacy findings than like a transparent examination of whether the project is in tension with important policy frameworks or local conditions. Given the scale of the requested actions and the prominence of the site, the chapter should have done more to explain where policies align, where they compete, and why the applicants believe those conflicts should nonetheless be resolved in favor of the Proposed Actions.

Why this matters:

If Chapter 2 ends the inquiry too quickly, it deprives City Planning and the public of a fuller record on one of the most important questions in the case: whether this is the right land-use and public-policy outcome for this waterfront site.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 2 with a more robust public-policy analysis that does not simply catalog supportive policies, but instead addresses the principal policy tensions raised by the Proposed Actions and explains why those tensions do or do not warrant a more detailed assessment.

Comments on DEIS Chapter 5 – Open Space

Chapter 5 is one of the most important chapters in this DEIS because the project would introduce approximately **2,795 new residents** into a neighborhood that the DEIS itself acknowledges already has a low active open-space ratio, even under No-Action conditions. CEQR does not allow an applicant to dismiss worsening open-space conditions merely because a deficiency already exists. To the contrary, the CEQR Technical Manual states that a project may result in a significant adverse open-space impact where it reduces open-space ratios in a way that overburdens existing facilities or **further exacerbates an existing deficiency**, and it specifically requires attention to the balance of **active versus passive** open space.

Comment 30: The chapter understates the significance of worsening an already severe active open-space deficit

Chapter / Section: Chapter 5, Principal Conclusions / Impact Determination / Tables 5-9 and 5-10

DEIS Claim / Statement:

“In the With-Action condition, the active OSR would decrease by approximately 8.1 percent, from 1.07 acres per 1,000 residents in the No-Action condition to 0.98 acres per 1,000 residents in the With-Action condition.”

“Although the active OSR would remain below the City’s planning goal, as in the existing and No-Action conditions ... no significant adverse impact to open space resources would occur.”

“For passive open space, the 5 percent change threshold applies, and for active open space, the 3 percent change threshold applies...”

Response:

This conclusion is not persuasive under CEQR’s own logic. The DEIS’s numbers show the active open-space ratio falling from **1.07** to **0.98** acres per 1,000 residents—well below the City’s planning goal of **2.0 acres per 1,000 residents** for active open space, and in fact below half that benchmark. The DEIS then dismisses that worsening on the ground that the area was already below the planning goal. That is backwards. CEQR specifically warns that significance may arise where a project **further exacerbates an existing deficiency**. It does not allow an existing shortfall to become a reason for finding no impact when a project makes conditions worse.

The DEIS’s own threshold discussion also cuts against its conclusion. Chapter 5 states that for active open space, the relevant percentage-change guidance is **3 percent** in the OSR range at issue. Yet the DEIS reports an **8.1 percent** decrease in the active ratio. That should, at minimum, trigger a far more searching explanation of why this reduction is not significant, especially in a neighborhood adjoining an incomplete waterfront park and already lacking sufficient active open space. Instead, the chapter effectively treats the deficiency as normal and the worsening as acceptable. That is precisely the kind of logic CEQR is designed to guard against.

Why this matters:

If City Planning accepts this reasoning, then neighborhoods that are already underserved by active open space will be the easiest places to worsen further. That is not a defensible approach to environmental review or equitable planning.

Requested correction / action:

City Planning should require the applicants to revise Chapter 5 to acknowledge that the project materially worsens an existing active open-space deficiency and to evaluate whether that worsening constitutes a significant adverse impact under CEQR. At a minimum, the DEIS should directly explain why an **8.1 percent** decline in the active OSR—far exceeding the chapter’s own 3 percent guidance threshold—does not warrant a significance finding.

Comment 31: The chapter relies on improper qualitative offsets that do not actually substitute for public active open space

Chapter / Section: Chapter 5, Principal Conclusions / Qualitative Assessment / Impact Determination

DEIS Claim / Statement:

“Although the active OSR would remain below the City’s planning goal ... the decrease in the active OSR would be offset by the provision of new public open space as part of the Proposed Development, long-term funding from the Project Developer to the City/NYC Parks, and private open space terraces for use by residents of the Proposed Development, thereby alleviating demand on nearby public open space resources.”

“Residents of the Proposed Development would also have access to approximately 18,000 sf of private terrace space as a building amenity, which would alleviate demand on public open spaces in the study area.”

Response:

The chapter’s qualitative “offset” logic is weak and, in several respects, not comparable to the public active-open-space deficit it is trying to explain away. First, **private rooftop and terrace amenities are not the same thing as publicly accessible active open space** serving the broader neighborhood. CEQR does allow private space to be considered qualitatively where it genuinely serves project residents and offsets some demand. But that does not make private terraces an adequate substitute for the shortage of neighborhood-serving active open space in a study area already below the City’s planning goal.

Second, annual funding for park operations is not itself open space. It may improve maintenance, but it does not create new acreage, expand the amount of active recreation area, or cure overcrowding. Third, the chapter repeatedly characterizes the project’s new waterfront access areas as supporting “active recreation” because people may walk or jog there. But CEQR explicitly requires consideration of the balance of **active versus passive** space and recognizes that active uses generally require more physical space than passive uses. A waterfront promenade or access corridor may be valuable, but it is not equivalent to a meaningful increase in active recreation acreage for a growing residential population.

In short, the DEIS does not persuasively show that the things it calls “offsets” are truly comparable to the type of open-space shortfall the project worsens.

Why this matters:

If the DEIS can avoid a significant adverse open-space finding by combining private resident amenities, maintenance funding, and linear waterfront circulation space, then CEQR’s distinction between public active open space and other forms of amenity becomes largely meaningless.

Requested correction / action:

City Planning should require the applicants to revise the qualitative assessment so that it clearly distinguishes between:

1. publicly accessible active open space;
2. passive or circulation-oriented waterfront access space;
3. private resident-only amenities; and
4. maintenance funding.

The DEIS should not treat all of these as interchangeable offsets for a worsening public active-open-space deficit.

Comment 32: The chapter overstates the project's open-space benefit by conflating total open space, publicly accessible space, required waterfront access areas, and other non-equivalent spaces

Chapter / Section: Chapter 5, Introduction / With-Action Condition / Qualitative Assessment

DEIS Claim / Statement:

“The development would include the creation of over an acre of waterfront open space (approximately 50,000 sf or 1.15 acres).”

“In the With-Action condition, the Proposed Development would introduce approximately 50,000 sf of open space, including an approximately 0.99-acre publicly accessible landscaped WPAA (34,000 sf) and PAA (9,000 sf)...”

“The remaining 7,000-sf remainder of the new open space would consist of open space for museum visitors, as well as landscaping and planting areas...”

“The turnaround area would be considered PAA with a turnaround of approximately 2,000 sf.”

Response:

The chapter repeatedly markets “approximately 50,000 sf” of open space, but that headline number masks several important distinctions. The project description elsewhere clarifies that only **43,000 sf** of that amount would be publicly accessible, consisting of **34,000 sf of required WPAA** and **9,000 sf of PAA**, and that the remaining **7,000 sf** includes museum-related space and landscape areas. Another project chapter also states that approximately **2,000 sf** of the turnaround area would be counted as PAA.

That matters because not every square foot credited under the “open space” label serves the same public function. Required waterfront access areas are not the same thing as discretionary new parkland. Museum-related open space and planting areas are not necessarily equivalent to freely usable public recreation space. And a vehicular turnaround area counted as PAA raises obvious questions about whether all of the credited acreage is truly comparable in usability and recreation value. CEQR requires not just quantity, but attention to **usability and quality**. A serious open-space analysis should therefore be much more precise about what acreage is publicly accessible, what acreage is ground-level and genuinely usable for recreation, what acreage is required by waterfront rules, and what acreage is constrained by vehicular or circulation functions.

This concern is closely related to other public comments already raised on the project: if vehicular turnarounds, planting areas, or other constrained spaces are being counted as though they were equivalent to genuinely usable public open space, the ratios and qualitative conclusions may be overstated.

Why this matters:

The open-space chapter should help City Planning understand what kind of public open space the project truly creates—not just the largest number that can be presented in summary form.

Requested correction / action:

City Planning should require the applicants to provide a recalculation and clearer breakdown of the project's credited open space, distinguishing at minimum between:

1. total open space;
2. publicly accessible ground-level space;
3. required WPAA/PAA areas;
4. museum-related or landscaped areas; and
5. any spaces affected by turnaround, vehicular, or other functional constraints.

The DEIS should evaluate whether all credited areas are genuinely usable and comparable for public open-space purposes.

Comment 33: The chapter's reliance on the future 35.53-acre Bushwick Inlet Park figure requires more transparency about what is actually usable and available to residents

Chapter / Section: Chapter 5, Existing Conditions / No-Action Condition / Qualitative Assessment

DEIS Claim / Statement:

"When all parcels are fully built out, the future park will total 35.53-acres of public open space."

"In the No-Action condition, it is expected that the unimproved areas of Bushwick Inlet Park would be completed, providing a total of 35.53 acres of public open space."

"Future residents and members of the public would have access to the entire Bushwick Inlet Park..."

Response:

The DEIS relies heavily on the assumption that by 2031 residents will have access to the **entire 35.53-acre Bushwick Inlet Park**, and that this full acreage can be used in the quantitative and qualitative open-space analysis. That assumption may ultimately prove correct, but the chapter does not provide enough transparency about what exactly is included in that acreage and how much of it is truly usable for the kinds of active and passive recreation the OSR analysis is meant to reflect.

This is an area where other commenters have raised a serious concern that should be addressed directly in the DEIS: whether the 35.53-acre figure includes water areas, edge conditions, buffers, or other portions of the park that are not genuinely usable as publicly accessible recreational acreage. If that is the case, then the DEIS should disclose it and, if

necessary, adjust the open-space calculations accordingly. Even if the applicants ultimately conclude that the full figure is appropriate, the chapter should show its work. Right now it does not.

The problem is especially important because Bushwick Inlet Park is carrying a great deal of analytical weight in this chapter. It is the main reason the total and passive ratios improve in the No-Action condition and remain above planning goals in the With-Action condition. When a future park assumption plays that large a role in the numbers, the DEIS should be more explicit about what acreage is counted, how it is classified, and whether that acreage is fully usable.

Why this matters:

If the Bushwick Inlet Park acreage is overstated or insufficiently explained, then the chapter's ratio calculations and no-impact conclusion may be materially skewed.

Requested correction / action:

City Planning should require the applicants to disclose in detail how the **35.53-acre** figure for Bushwick Inlet Park was derived, including whether it includes water area, shoreline buffers, inaccessible or constrained portions, or other acreage that is not genuinely usable public open space. If necessary, the DEIS should recalculate ratios using only publicly accessible, usable park acreage.

Comment 34: The chapter improperly relies on speculative off-site Box Street Park benefits outside the study area as a qualitative factor supporting the no-impact conclusion

Chapter / Section: Chapter 5, Principal Conclusions / Study Area / Qualitative Assessment

DEIS Claim / Statement:

“Because the ERU Facility would move operations to the NYCTA Relocation Site in the With-Action condition, the 25,000-sf ERU Site would be vacant, which would allow for the full realization of the City’s long-anticipated plan for Box Street Park. Though located outside of the half-mile study area, the larger Greenpoint neighborhood would benefit from this additional open space resource that would not have an immediate path forward without the Proposed Actions.”

“However, the City’s future development on both the ERU Site and the Paratransit Site is not considered to be part of the Proposed Development, and is outside of the study area so is therefore not considered in the quantitative analysis. The existing and future conditions are shown for qualitative consideration.”

Response:

The chapter cannot have this both ways. It says Box Street Park is **outside the study area** and **not part of the Proposed Development**, so it is excluded from the quantitative analysis. Yet it still repeatedly invokes the future realization of Box Street Park as a qualitative reason to view the project more favorably. That is analytically inconsistent. A contingent off-site benefit that is not part of the study area and not part of the Proposed Development should not be used

to soften the impact conclusion unless the DEIS clearly explains the degree of certainty, timing, and relevance of that benefit to the actual CEQR open-space question.

This is particularly important because the chapter already depends on a number of qualitative offsets—private terraces, maintenance funding, out-of-study-area resources, and circulation-oriented waterfront access—to explain away a worsening active OSR. Adding Box Street Park to that list further blurs the line between actual project-generated open-space mitigation and broader neighborhood aspirations that depend on separate City action. CEQR requires comparative assessment of the project’s effects; it does not authorize speculative off-site benefits to substitute for rigorous on-site analysis.

Why this matters:

Using Box Street Park as a qualitative “plus” while disclaiming it from the formal study area and project definition risks overstating the project’s open-space benefits and understating its local burdens.

Requested correction / action:

City Planning should require the applicants either to:

1. remove Box Street Park from the chapter’s qualitative justification for a no-impact finding; or
2. provide a much more rigorous explanation of why that off-site, non-project, outside-study-area benefit should be considered in the open-space significance determination.

Comment 35: The chapter over-relies on Walk-to-a-Park service area status without adequately confronting the specific shortage of active open space

Chapter / Section: Chapter 5, Walk-to-a-Park Initiative / Principal Conclusions / Impact Determination

DEIS Claim / Statement:

“The Development Site is located in a Walk-to-a-Park Service Area and would continue to be well served by nearby open space resources.”

“Conversely, in areas that are within a Walk-to-a-Park Service Area, a marginally greater percentage of change may be acceptable.”

Response:

The DEIS appears to use the site’s Walk-to-a-Park status as a major reason to accept what would otherwise be a substantial deterioration in the open-space ratios. But being within walking distance of some parkland is not the same thing as being adequately served by the **type** of open space the neighborhood needs. CEQR’s open-space framework explicitly requires attention to the balance of active and passive space, and it states that active open space generally requires more physical space than passive uses. Here, the central deficiency is not simply access to any open space; it is the worsening of an already inadequate **active** open-space ratio.

A Walk-to-a-Park designation may be relevant context, but it should not be allowed to override the project's documented effect on the active OSR—especially where the DEIS's own numbers show that the active ratio drops to **0.98 acres per 1,000 residents**, far below the 2.0-acre planning goal. The chapter does not adequately explain why mere geographic access to parks is enough to overcome that shortfall.

Why this matters:

If Walk-to-a-Park status is treated as a broad excuse for worsening active-space deficits, then the analysis risks confusing geographic proximity with functional adequacy.

Requested correction / action:

City Planning should require the applicants to revise the chapter so that Walk-to-a-Park status is treated as one contextual factor only, not as a substitute for a rigorous analysis of whether the neighborhood has enough **active** open space to absorb the project's new residents.

Comment 36: The chapter should more fully address whether direct open-space effects include the loss of a wider public-space opportunity at Lot 25 and the waterfront edge, not only the absence of direct displacement of existing parkland

Chapter / Section: Chapter 5, Direct Effects Analysis

DEIS Claim / Statement:

“The Proposed Actions would not result in a physical loss of public open space, affect the use of an open space so that it no longer serves the same user population, or limit public access to an open space. As such, no direct open space impacts would occur.”

“NYC Parks has stated that it does not intend to acquire the property for use as a public park. Therefore, this land is not considered to be an existing open space or parkland.”

Response:

This direct-effects discussion is too narrow and too formalistic for this site. It is true that the applicants are not directly displacing an existing public park on the Development Site. But the chapter's analysis reduces direct effects to that question and largely ignores the more complicated public-space issue presented here: the site includes land identified as park on the City Map, sits at the edge of the future Bushwick Inlet Park system, and depends on a project design that includes required waterfront access areas, privately maintained space, and a museum/open-space arrangement on Lot 25.

Even if the chapter ultimately maintains that Lot 25 is not “existing open space” for CEQR inventory purposes, that does not mean the direct-effects discussion should end there. CEQR's own guidance recognizes that direct effects can include changes that alter open-space usefulness, accessibility, or comparable replacement value. Here, the public-space question is not simply whether an existing park is being taken away. It is also whether the project forecloses or narrows a potentially broader public-space outcome at this waterfront

edge and substitutes a more constrained configuration that the DEIS then credits as a benefit. That issue deserves a fuller explanation than the chapter provides.

Why this matters:

The public-space significance of this site cannot be captured solely by saying that no existing mapped playground or lawn is being demolished. The chapter should also reckon with the site’s broader park-edge and waterfront-open-space context.

Requested correction / action:

City Planning should require the applicants to expand the direct-effects discussion to explain more fully how the Proposed Actions affect the public-space opportunity at Lot 25 and the waterfront edge, beyond the narrow question of whether existing public parkland is physically displaced.

Comments on DEIS Chapter 8 – Urban Design and Visual Resources

Chapter 8 is important because CEQR does not treat urban design as an aesthetic afterthought. It asks whether a project changes the **arrangement, appearance, and functionality of the built environment** in a way that negatively affects the pedestrian experience of public space, and it specifically calls out issues such as changed building scale, obstructed view corridors, altered context for public parks and waterfront views, and the need for **objective and clear representation** of No-Action and With-Action conditions.

Comment 37: The chapter’s core compatibility conclusion is too conclusory for a project whose tallest tower exceeds nearby buildings by approximately 200 feet

Chapter / Section: Chapter 8, Principal Conclusions – Urban Design

DEIS Claim / Statement:

“The Proposed Actions are anticipated to have no significant adverse impacts on urban design within the study area.”

“Although the taller of the two West Building towers would exceed the height of other buildings within a quarter mile of the Development Site by approximately 200 feet, there would be no impact to urban design as a result of the Proposed Actions as the Proposed Development would not negatively affect a pedestrian’s experience of the area.”

“The proposed buildings would be in context with trending high-rise waterfront development that has resulted from the 2005 Greenpoint-Williamsburg Rezoning.”

Response:

This conclusion is too categorical and too lightly supported. The chapter acknowledges that the tallest tower would exceed other buildings within a quarter mile by approximately **200 feet**, yet it simply asserts that there would be “no impact” because pedestrian experience would not be negatively affected. That is not enough. CEQR’s urban-design framework does not allow a major change in scale to be dismissed with a conclusory statement. The CEQR Technical Manual specifically notes that a detailed analysis may be needed where a project may “**make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings**” and that **matching context is not necessarily the sole benchmark** for determining significance.

Here, the chapter leans heavily on “trending” waterfront development as though that trend resolves the compatibility issue. It does not. This site is not merely another anonymous waterfront parcel. It is adjacent to Bushwick Inlet Park, fronts Bushwick Inlet and the East River, and sits at a key break between large waterfront blocks and lower-scale inland fabric. The question is not simply whether there are other tall buildings somewhere nearby. The question is whether placing a roughly **600-foot / 640-foot with bulkhead** tower and a roughly **450-foot / 490-foot with bulkhead** companion tower at this specific waterfront and park edge changes the pedestrian experience and visual context in a materially adverse way. The chapter does not adequately show its reasoning on that point.

Why this matters:

A conclusory “compatible” finding can cause City Planning to underweight one of the project’s most visible and enduring consequences: the creation of a substantially taller, denser, more dominant waterfront wall than what exists today or what current zoning would otherwise support.

Requested correction / action:

City Planning should require the applicants to revise Chapter 8 to provide a more rigorous explanation of why a tower approximately 200 feet taller than other buildings within a quarter mile does not create an adverse urban-design effect, especially given the project’s adjacency to Bushwick Inlet Park, the waterfront, and the lower-scale inland neighborhood context.



PHOTOGRAPH 1: STUDY MODEL INSIDE THE GWE WIND TUNNEL LOOKING DOWNWIND
Source: DEIS, Appendix D, Wind Study

Comment 38: The chapter over-relies on “trend” and “activation” language and does not sufficiently test whether the project alters the context of Bushwick Inlet Park and the waterfront edge in a significant way

Chapter / Section: Chapter 8, Principal Conclusions – Urban Design / Existing and With-Action Conditions

DEIS Claim / Statement:

“The Proposed Development would connect to a network of existing neighborhood open spaces, transforming the currently underutilized area into an inviting public space.”

“The Proposed Development plays a critical role in establishing essential connections within this network of expanding neighborhood open spaces...”

“Pedestrians would benefit from an engaging and transparent ground plane, with active street frontage replacing the current blank wall and inactive block frontage.”

Response:

These statements foreground project benefits without sufficiently addressing the urban-design tradeoff the project creates at the Bushwick Inlet waterfront edge. CEQR’s urban-design analysis is not limited to whether a project “activates” a blank wall or introduces retail. It also asks whether the project changes the **context of visual resources**, including public parks and waterfronts, and whether those changes alter the pedestrian experience in a meaningful way. The CEQR Technical Manual specifically identifies as a potential concern circumstances where a project changes the scale of surrounding buildings or removes open areas that serve as the setting for a visual resource.

Here, the chapter repeatedly describes the site as underutilized and the proposal as a connective improvement, but it does not seriously examine the countervailing issue: the project would insert extremely large towers and a much heavier built program directly adjacent to Bushwick Inlet Park and the East River waterfront. That may indeed create some new public access and ground-floor activity, but those asserted benefits do not answer whether the project also changes the setting, scale, openness, and visual character of this waterfront edge in a materially adverse way. The chapter’s “activation” narrative reads more like project branding than a full CEQR balancing of gains and losses.

Why this matters:

Urban design is not only about enlivening streets. It is also about preserving or altering the spatial experience of public waterfronts, parks, and view corridors. A chapter that stresses activation while minimizing contextual loss can understate the real design consequences of the project.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 8 with a more explicit analysis of how the project changes the urban-design context of Bushwick Inlet Park and the waterfront edge, including whether the scale and siting of the towers alter the public experience of openness, visual relief, and park adjacency.

Comment 39: The visual-resources conclusion is too absolute and insufficiently supported, especially the claim that the proposal would allow “uninterrupted and improved views”

Chapter / Section: Chapter 8, Principal Conclusions – Visual Resources

DEIS Claim / Statement:

“The visual resources located within the study area include the East River, the Manhattan skyline, and Bushwick Inlet Park.”

“The proposed site plan would allow uninterrupted and improved views of the East River, the Manhattan skyline, and Bushwick Inlet Park. Therefore, no significant adverse impacts to these visual resources would occur because of the Proposed Actions.”

Response:

This conclusion is too sweeping for a project that would place towers of roughly **600 feet** and **450 feet** directly on the waterfront. CEQR’s visual-resources guidance does not stop at whether some views remain. It asks whether the project **obstructs important visual resources**, whether those effects are permanent, how many viewers are affected, whether the view is unique, and whether the project changes the context in which the resource is experienced.

The chapter’s formulation—“uninterrupted and improved views”—suggests near-total visual enhancement, which is difficult to reconcile with the scale and waterfront siting of the proposed buildings. The project may indeed create some new north-south visual openings and some improved access to the waterfront. But that is not the same thing as showing that the project creates no meaningful obstruction, framing effect, or contextual alteration for public views of the East River, the Manhattan skyline, and Bushwick Inlet Park. The chapter should be much more precise about **where** views improve, **where** they may narrow or change, and **how** the visual experience of these resources changes from actual public vantage points. As written, the conclusion sounds more promotional than analytical.

Why this matters:

Visual-resource conclusions can be especially misleading when they flatten a complex reality into “improved views.” For a waterfront project of this size, City Planning needs a more nuanced record of what views are opened, what views are altered, and what public vantage points are most affected.

Requested correction / action:

City Planning should require the applicants to revise the visual-resources analysis so that it clearly identifies where views are improved, where they are narrowed or reframed, and how the project changes the public experience of the East River, the Manhattan skyline, and Bushwick Inlet Park from specific pedestrian vantage points.

Comment 40: The study area is too limited for a project whose visual and skyline effects plainly extend beyond a quarter mile

Chapter / Section: Chapter 8, Study Area / Methodology

DEIS Claim / Statement:

“Consistent with Chapter 2, Land Use, Zoning, and Public Policy, the area within a quarter mile of the Development Site is defined as the study area for this analysis.”

“The Proposed Development is located adjacent to visual resources, and given its proposed height, would be visible among existing recognizable buildings in the skyline.”

Response:

The chapter's study area is too cramped for the type of visual-resource effects it claims to analyze. The project's own methodology section acknowledges that, given its height, the proposed development would be visible in the skyline among recognizable buildings. Yet the analysis is bounded by a **quarter-mile** study area. That may be sufficient for some street-level urban-design questions, but it is not obviously sufficient for a visual-resources analysis involving the Manhattan skyline, the East River waterfront, Bushwick Inlet Park, and towers that the DEIS itself says would stand out in the skyline.

CEQR's visual-resource guidance specifically asks how many viewers would be affected and whether the visual resource can be seen from many other locations. Those are not inherently quarter-mile questions. A more rigorous chapter would at least explain why the chosen study area is adequate for evaluating skyline and waterfront visual-resource effects, or supplement the study with a broader set of public vantage points. The current analysis does not do that.

Why this matters:

A study area that is too limited can make visual-resource impacts appear more local and less significant than they actually are, especially for very tall waterfront buildings visible from multiple public locations.

Requested correction / action:

City Planning should require the applicants to explain why a quarter-mile study area is sufficient for the visual-resources analysis, and to supplement the record with a broader set of public waterfront and neighborhood vantage points if needed.

Comment 41: The chapter's graphics are too qualified and too non-committal to satisfy CEQR's need for objective and clear representation of No-Action and With-Action conditions

Chapter / Section: Chapter 8, Methodology / Figures 8-3 through 8-10

DEIS Claim / Statement:

"future conditions without and with the Proposed Action also rely on computer imaging and graphic renderings."

"Figure 8-3 Proposed Illustrative Site Plan ... Site plan is conceptual and provided for illustrative purposes only."

"Figure 8-4 East and West Building Illustrative Elevation ... For illustrative purposes only."

"Figure 8-5 West Building – East and West Illustrative Elevations ... For illustrative purposes only."

"Figure 8-10 Comparative View Facing Northwest on Franklin Street ... For illustrative purposes only."

Response:

This is a serious weakness in a chapter that depends so heavily on visual persuasion. The Urban Design chapter says it relies on computer imaging and graphic renderings, yet the key figures are repeatedly labeled “**illustrative,**” “**conceptual,**” and “**for illustrative purposes only.**” CEQR’s Urban Design guidance calls for **objective and clear representation** of the likely effects of the proposed project on the pedestrian experience, including comparative drawings and three-dimensional representations of No-Action and With-Action conditions. The Manual specifically says that changes should be **clearly denoted** on comparative drawings.

Here, the DEIS offers drawings and renderings that are explicitly disclaimed as conceptual and illustrative, rather than clearly presented as accurate, representative depictions of what the project would actually look like at scale in relation to its surroundings. That problem is not merely academic. As a factual matter, the applicants have not shown the public or Brooklyn Community Board 1’s Land Use Committee an accurate, representative, true-to-scale model in their public presentations when such visuals were requested. The only actual to-scale physical model of the project that has surfaced in this record appears buried in the wind-study materials in Appendix D, as reflected in the attached image of the Gradient Wind wind-tunnel model.

That public-process fact matters because it underscores how much the chapter depends on softened or qualified imagery while avoiding a more candid, representative depiction of the project’s true scale. If the only actual scale model available to the public appears in a wind appendix rather than in the Urban Design chapter itself, then the chapter has not presented the project’s visual consequences with the clarity CEQR contemplates.

Why this matters:

Urban design and visual resources are inherently visual subjects. If the chapter relies on conceptual, illustrative graphics instead of clear, representative, to-scale depictions, then the public and decision-makers may not be seeing the project honestly.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 8 with objective, clearly scaled, representative visual materials showing the No-Action and With-Action conditions from key public vantage points, including Bushwick Inlet Park, West Street, Franklin Street, and other relevant waterfront approaches. The DEIS should not rely primarily on conceptual or illustrative graphics where CEQR calls for clear comparative representation.

Comment 42: The chapter improperly uses project benefits such as affordable housing and open-space maximization to justify height in an urban-design analysis

Chapter / Section: Chapter 8, Principal Conclusions – Urban Design

DEIS Claim / Statement:

“Further, the additional height contemplated under the Proposed Actions would allow for an increased number of affordable housing units and would help to maximize the publicly accessible open space on-site.”

Response:

This is not an adequate urban-design rationale. Whether height supports more affordable housing or allows the applicants to configure on-site open space in a particular way may be relevant to project objectives or policy arguments. But it does not answer the urban-design question CEQR asks: whether the resulting change in scale, arrangement, appearance, or functionality of the built environment negatively affects the pedestrian experience. CEQR does not allow a project to avoid an adverse urban-design finding simply because the applicant claims the added height pays for other benefits.

This sentence is especially problematic because it effectively treats project benefits as a substitute for impact analysis. The project may very well produce some public benefits. But the fact that greater height may support those benefits does not demonstrate that the height itself is urban-design neutral. Those are separate questions, and the chapter conflates them.

Why this matters:

If City Planning accepts benefit-justification as a substitute for urban-design analysis, then any increase in height can be defended simply by pointing to what it helps finance or fit on-site, rather than by assessing its actual design consequences.

Requested correction / action:

City Planning should require the applicants to revise Chapter 8 so that the urban-design significance discussion is based on CEQR's actual urban-design criteria, not on the asserted policy or programmatic benefits of added height.

Comment 43: The chapter's conclusion that no significant adverse visual-resource impact would occur is not sufficiently reconciled with the project's own wind-tunnel model, which reveals the true scale and massing more starkly than the illustrative chapter graphics

Chapter / Section: Chapter 8, Visual Resources / Wind / Appendix D relationship

DEIS Claim / Statement:

"The pedestrian wind study determined that the Proposed Development would adhere to the wind safety criteria and would conform to the respective pedestrian comfort standards."

"The wind analysis is based on the Pedestrian Level Wind Study conducted by Gradient Wind Engineering Inc. (Gradient Wind) for the Proposed Development, as provided in Appendix D."

Response:

The wind-study materials reveal something important beyond wind: they appear to contain one of the only true physical scale models of the project in the public record. The attached image of the Gradient Wind wind-tunnel model shows the massing of the proposed towers in their surrounding context in a way that is much more candid than the chapter's repeated "illustrative" site plans and elevations.

That matters because the DEIS's Urban Design chapter insists there would be no significant adverse impacts to urban design or visual resources, yet the clearest physical representation of the project's actual scale relative to its surroundings is effectively buried in a technical appendix devoted to wind. If a true-scale model exists for wind analysis, there is no good reason why similarly candid, to-scale visual materials should not have been centered in Chapter 8 and in public presentations. The difference between what is shown illustratively and what appears in the model raises a legitimate concern that the chapter does not present the project's bulk and skyline presence as plainly as it should.

Why this matters:

City Planning should not have to infer the real visual scale of a project from a wind appendix. For a waterfront project of this size, the core urban-design chapter should be the place where the project's true massing and public-realm consequences are shown most clearly.

Requested correction / action:

City Planning should require the applicants to place true-scale, context-rich visual depictions of the project front and center in Chapter 8, rather than relying on illustrative graphics while the clearest physical representation of the project appears only in Appendix D wind materials.



PHOTOGRAPH 1: STUDY MODEL INSIDE THE GWE WIND TUNNEL LOOKING DOWNWIND
Source: DEIS, Appendix D, Wind Study

Comments on DEIS Chapter 17 – Neighborhood Character

Chapter 17 is not a minor wrap-up chapter. Under CEQR, neighborhood character is the place where the DEIS is supposed to synthesize whether the project’s changes—individually or in combination—affect the defining features of the area. That is especially important here, where the Proposed Actions would introduce very large new towers at the Bushwick Inlet waterfront edge, worsen an already deficient active open-space ratio, alter the visual setting of Bushwick Inlet Park and the waterfront, and generate admitted significant adverse traffic, pedestrian, and construction-noise impacts. A neighborhood character chapter that simply restates prior “no impact” conclusions and then labels the project an “enhancement” does not satisfy that function.

Comment 44: The DEIS improperly limits Chapter 17 to a preliminary assessment even though the project presents both admitted significant adverse impacts and a combination of moderate effects that warrant deeper synthesis

Chapter / Section: Chapter 17, Introduction / Methodology / Principal Conclusions

DEIS Claim / Statement:

“This section includes a preliminary assessment of neighborhood character...”

“The Proposed Actions would result in significant adverse impacts to operational and construction traffic and pedestrian elements, and construction noise. Therefore, a preliminary assessment of neighborhood character impacts is provided below.”

“In the absence of an impact on any of the relevant technical areas, a combination of moderate effects to the neighborhood could result in an impact to neighborhood character.”

Response:

This is too thin a level of review for this project. The chapter acknowledges that the Proposed Actions would result in significant adverse operational and construction traffic impacts, significant adverse pedestrian impacts, and unavoidable significant adverse construction noise impacts. It also relies on prior chapters that describe a very large change in waterfront bulk and form, an admitted worsening of active open-space ratios, and substantial visual and park-edge changes. Yet despite that combination of admitted significant impacts and multiple moderate-to-strong contextual effects, the DEIS performs only a preliminary neighborhood character assessment and then reaches a categorical no-impact conclusion.

CEQR’s own guidance cuts the other way. The Technical Manual explains that neighborhood character may be affected either through the potential for a significant adverse impact in a contributing technical area **or** through a combination of moderate effects across several areas. It also states that if a project has the potential to affect defining features of a neighborhood, a **detailed assessment** may be appropriate, using field observations, photographs, and a fuller comparison of No-Action and With-Action conditions.

Here, the chapter does not really perform that kind of synthesis. Instead, it largely repeats the results of earlier chapters and then asserts that the project would “enhance” neighborhood character. For a project of this scale at this waterfront location, that is not enough.

Why this matters:

Neighborhood character is the chapter where City Planning should be able to see the full cumulative picture. If the chapter is kept at a cursory preliminary level despite admitted significant impacts and multiple moderate effects, the DEIS understates one of the most important planning judgments in the record.

Requested correction / action:

City Planning should require the applicants to prepare a more robust, detailed neighborhood

character assessment that goes beyond a preliminary restatement of prior chapters and directly evaluates the combined effect of the project's scale, open-space burden, waterfront siting, visual change, traffic, pedestrian, and construction impacts on the defining features of the area.

Comment 45: The chapter defines neighborhood character too generically and fails to identify the Bushwick Inlet waterfront, park edge, and public waterfront experience as central defining features

Chapter / Section: Chapter 17, Preliminary Assessment – Defining Features of the Neighborhood

DEIS Claim / Statement:

“The area within an approximate quarter-mile radius of the Development Site contains several distinct areas...”

“The Greenpoint neighborhood comprises much of the study area and encompasses the Development Site. This area presents a blend of residential, commercial, industrial, and institutional uses, all contributing to its dynamic urban landscape.”

“The waterfront is experiencing an increase in mixed-use high-rise buildings...”

“Adjacent to and south of the Development Site is Bushwick Inlet Park...”

Response:

The chapter's definition of neighborhood character is too broad and too trend-driven. It describes the area as a “dynamic urban landscape” and emphasizes the increase in mixed-use high-rise buildings along the waterfront, but it does not adequately identify the more site-specific defining features that make this location distinct: the Bushwick Inlet waterfront edge, adjacency to Bushwick Inlet Park, the unfinished/open evolving character of that park system, public views and openness at the waterfront, and the transition between large waterfront blocks and lower-scale inland streets.

That omission matters because CEQR's Technical Manual specifically notes that defining neighborhood features may include **waterfront areas, local or destination parks, natural open spaces, view sheds and corridors, and proximity to other natural features**. It also says that the neighborhood character discussion should focus on the area's **major characteristics** and should not merely repeat generic technical-area information.

Here, the chapter effectively treats “ongoing waterfront development” as the dominant defining feature and then uses that framing to normalize this project's scale. That is too convenient.

The question is not only whether there are other waterfront towers nearby. It is also whether this particular site's role as part of the Bushwick Inlet park and waterfront experience makes it more sensitive to changes in bulk, openness, traffic, and public-space configuration than the chapter acknowledges.

Why this matters:

If the defining features are framed too generically, then the rest of the neighborhood character analysis becomes tilted toward a finding that any additional waterfront development is simply part of the trend.

Requested correction / action:

City Planning should require the applicants to revise the defining-features discussion so that it squarely addresses the Bushwick Inlet waterfront, adjacency to Bushwick Inlet Park, public waterfront views and openness, and the site's park-edge condition as major determinants of neighborhood character.

Comment 46: The chapter's conclusion that the project would "enhance" neighborhood character is advocacy, not analysis, and it relies on contested assumptions from other DEIS chapters

Chapter / Section: Chapter 17, Principal Conclusions / Potential to Affect the Defining Features of the Neighborhood

DEIS Claim / Statement:

"The Proposed Actions would enhance the neighborhood character of the study area surrounding the Development Site."

"Overall, the Proposed Actions would not adversely affect the defining features of the neighborhood and instead, would enhance them..."

"Relocating this facility would allow for more appropriate development along the waterfront."

"By introducing a mix of new residential and commercial spaces, enhancing existing public amenities, and ensuring sustainable and accessible urban design, the Proposed Development not only preserves but actively contributes to the defining features of the Greenpoint neighborhood..."

Response:

This is not a neutral neighborhood character conclusion. It is a project-advocacy conclusion. The chapter repeatedly uses words like "enhance," "improvement," and "more appropriate development" while largely assuming away the very tradeoffs that neighborhood character is supposed to synthesize. It counts as benefits things that are actively disputed elsewhere in the DEIS record, including the claimed adequacy of the project's open-space package, the assertion that the project improves views and pedestrian experience, and the idea that the site's public waterfront role is better served by this tower-and-access configuration than by other public-land outcomes.

This is especially problematic because the chapter depends heavily on prior "no impact" conclusions that are themselves contestable. For example, the Open Space chapter reports an **8.1 percent** decline in the active open-space ratio, taking it down to **0.98 acres per 1,000**

residents, yet still finds no significant adverse open-space impact. The Urban Design chapter acknowledges that the tallest tower would exceed nearby buildings within a quarter mile by approximately **200 feet**, yet still finds no significant adverse urban-design impact. Chapter 17 simply imports those conclusions and then labels the overall neighborhood result an enhancement. That is not a real synthesis.

Why this matters:

Neighborhood character is one of the places where decision-makers most need an honest balancing of project gains and losses. A chapter written in benefit-forward, advocacy-style terms can make a contested project appear settled rather than debatable.

Requested correction / action:

City Planning should require the applicants to revise Chapter 17 so that it describes the project's effects in neutral, analytic terms and directly addresses the tradeoffs the project creates, rather than concluding in advance that the project "enhances" neighborhood character.

Comment 47: The chapter improperly dismisses significant traffic and pedestrian impacts by saying they are "similar" to conditions already found in the area

Chapter / Section: Chapter 17, Transportation – Traffic and Pedestrians

DEIS Claim / Statement:

"The resulting traffic and pedestrian conditions would be similar to those already seen in the neighborhood defining the study area, and would not be out of character with the surrounding neighborhood..."

"Although there would be an increase in traffic activity due to the Proposed Development, the resulting conditions would be like those typically found within the study area. Therefore, the traffic impacts of the Proposed Development are not anticipated to cause substantial changes to the character of the neighborhood."

"Although there would be an increase in pedestrian activity due to the Proposed Development, the resulting conditions would be like those typically found within the study area. Therefore, the pedestrian impacts of the Proposed Development are not anticipated to cause substantial changes to the character of the neighborhood."

Response:

This is one of the chapter's weakest analytical moves. The DEIS admits significant adverse operational and construction traffic impacts and unmitigated pedestrian impacts, yet it dismisses them on the ground that congestion and pedestrian activity are already common in the area. CEQR does not allow an existing burden to become a reason for finding that adding more burden has no neighborhood character consequence. To the contrary, the Technical Manual gives the example that increased traffic and pedestrian activity on local streets—even if not dramatic in any single category—can, in combination, alter neighborhood character.

That point has special force here because the admitted pedestrian impact occurs at **Franklin Street and Quay Street**, directly adjacent to the project site and the Bushwick Inlet Park edge, not at some abstract point far from the project. The issue is not only whether congestion exists elsewhere in Greenpoint-Williamsburg. The issue is whether this project adds enough traffic and pedestrian intensity at this specific waterfront and park-edge location to alter the area's functioning and feel. The chapter does not really engage that question. It simply normalizes the increase by reference to a broader neighborhood trend.

Why this matters:

If preexisting congestion and activity are allowed to excuse further project-generated congestion and crowding, then neighborhood character review becomes least protective exactly where neighborhoods are already under strain.

Requested correction / action:

City Planning should require the applicants to revise the traffic and pedestrian discussion so that it evaluates whether the project's admitted significant impacts at and near the Development Site affect the functioning and feel of this specific waterfront / park-edge location, rather than dismissing them as merely "typical" of broader neighborhood conditions.

Comment 48: The chapter improperly treats unavoidable construction noise and related construction impacts as too "temporary" to matter, without accounting for their duration, immediacy, and combination

Chapter / Section: Chapter 17, Construction – Traffic / Pedestrians / Noise

DEIS Claim / Statement:

"Although there would be an increase in traffic activity due to the construction of the Proposed Development, the resulting conditions would be like those typically found within the study area and would be temporary."

"It is possible that construction activities could result in significant adverse pedestrian impacts... the potential for significant pedestrian impacts during construction would be no worse than what has been identified for the operational condition..."

"There would be potential for construction of the Proposed Development to result in significant adverse construction noise impacts at one receptor, 3 West Street, which is located across the street from the Development Site."

"Although the construction noise impact would be unavoidable. It would be temporary in duration and would not be anticipated to cause substantial changes to the character of the neighborhood."

Response:

The chapter leans far too heavily on the word "temporary." Construction impacts may be temporary in the abstract, but that does not mean they are insignificant for neighborhood character—especially where the receptor experiencing unavoidable construction noise is

directly across the street from the Development Site, and where the project also generates significant construction traffic and potential construction pedestrian impacts. CEQR does not establish a simple rule that a significant impact stops mattering because it ends when construction ends. The question is whether the effect is substantial enough, and sufficiently related to the defining features of the neighborhood, to alter the area’s character during the period in which it occurs.

That question is especially important for a project of this scale. The Proposed Development would involve multi-year construction of very large waterfront buildings. The Executive Summary itself identifies the peak construction quarter as **Q4 2029**, with an average of **636 construction workers** and **45 trucks** per day during the peak quarter. Even if those conditions are not permanent, they are not trivial. The chapter should not reduce them to “temporary” and move on.

The problem is compounded because the chapter treats each construction effect in isolation and then minimizes it. CEQR specifically contemplates that a combination of moderate or significant effects across several contributing elements may, together, alter neighborhood character. Here, the chapter should have examined the combined effect of unavoidable construction noise at 3 West Street, construction traffic, construction pedestrians, and the intense scale of waterfront construction activity immediately adjacent to Bushwick Inlet Park and nearby residences. It does not do so.

Why this matters:

For nearby residents and park users, a multi-year period of unavoidable construction noise and circulation disruption is not a negligible experience. A neighborhood character chapter that writes off those effects as merely temporary understates the real lived consequence of the project.

Requested correction / action:

City Planning should require the applicants to revise the construction discussion so that it evaluates the **combined** effect of unavoidable construction noise, construction traffic, construction pedestrian impacts, and large-scale waterfront construction activity on neighborhood character, rather than dismissing those effects individually as temporary.

Comment 49: The chapter improperly substitutes repetition of prior chapter conclusions for the CEQR-required synthesis of combined effects

Chapter / Section: Chapter 17, Potential to Affect the Contributing Elements of Neighborhood Character

DEIS Claim / Statement:

“As described in Chapter 2...”

“As discussed in Chapter 3...”

“As described in Chapter 5...”

“As discussed in Chapter 8...”

“Therefore, defining features of the neighborhood would not be adversely affected...”

Response:

Much of Chapter 17 simply repeats the conclusions of earlier chapters and then states that neighborhood character is unaffected. But CEQR’s neighborhood character framework requires more than a chain of cross-references. The Technical Manual says the analysis should identify the major characteristics of the neighborhood, should not merely repeat information from the contributing technical areas, and should determine whether a project affects defining features either through significant impacts or a combination of moderate effects.

That is not what this chapter does. It does not meaningfully synthesize how worsening active open-space conditions, extremely large new waterfront bulk, altered visual context, admitted traffic and pedestrian impacts, and unavoidable construction noise interact at this particular site. Instead, it adopts earlier chapter conclusions and then announces that the project is consistent with neighborhood growth and would enhance neighborhood character. That is not a serious combined-effects analysis.

Why this matters:

Neighborhood character is supposed to be the place where the DEIS takes a step back and asks what the project means as a whole for the surrounding area. If it is reduced to a summary of earlier “no impact” findings, that function is lost.

Requested correction / action:

City Planning should require the applicants to revise Chapter 17 so that it performs an actual combined-effects synthesis, rather than largely repeating prior chapter conclusions. The revised chapter should directly evaluate how the project’s scale, open-space burden, park-edge condition, visual change, traffic, pedestrian, and construction impacts interact to affect the defining features of the Bushwick Inlet / Greenpoint waterfront area.

Comments on DEIS Chapter 9 – Natural Resources

Chapter 9 is one of the most important chapters in this DEIS because the Proposed Actions would directly alter the Bushwick Inlet shoreline, replace the existing revetment with a new sheet-pile bulkhead and rock revetment, introduce very large new waterfront buildings, and rely on a broad claim that ecological conditions would ultimately improve despite temporary in-water and shoreline disturbance. CEQR’s natural-resources framework does not allow the analysis to stop at whether the on-site uplands are degraded. It requires evaluation of both **direct and indirect effects** on the resources **on or near the site**, including the City’s water, wetland, upland, and built resources, and it requires attention to short-term, long-term, and cumulative effects.

Comment 50: The chapter minimizes ecological significance by focusing too narrowly on the degraded condition of the upland site while understating the ecological importance of Bushwick Inlet and the East River immediately adjacent to it

Chapter / Section: Chapter 9, Existing Conditions / Principal Conclusions / Habitats and Vegetation / Bushwick Inlet–East River

DEIS Claim / Statement:

“Based on these existing conditions, the Development Site does not represent a significant source of vegetated habitats or native plant diversity.”

“The Development Site is currently characterized by disturbed and developed conditions, limited habitat value, low plant and wildlife species diversity, and high levels of invasive plant species.”

“Despite these conditions, the intertidal and subtidal waters of Bushwick Inlet and the East River that adjoin the Development Site support a diverse community of benthic, planktonic, and pelagic species, including finfish, shellfish and other macroinvertebrates...”

“Bushwick Inlet and the adjoining East River provide Essential Fish Habitat for adult, juvenile, larvae, and/or egg life stages for Winter Flounder ... Atlantic Butterfish ... Little Skate ... and eight other species... As part of ongoing efforts to establish self-sustaining oyster reef populations ... the Billion Oyster Project currently maintains and monitors a research station within Bushwick Inlet...”

Response:

The chapter’s framing is too dismissive. It repeatedly emphasizes that the upland portions of the Development Site are disturbed, fragmented, invasive-dominated, and not a significant source of native plant diversity. But CEQR’s natural-resources methodology does **not** ask only whether the upland lot is pristine. It asks whether natural resources occur **on or near** the site and whether the project would disturb them, directly or indirectly. Here, the chapter itself acknowledges that the immediately adjacent waters of Bushwick Inlet and the East River support a diverse aquatic community, provide NOAA-designated Essential Fish Habitat, and include an active oyster research station.

That distinction matters. The project is not confined to removing invasive plants on a degraded vacant lot. It would also reconstruct the shoreline edge, alter the intertidal interface, affect aquatic habitat during construction, and place large new buildings and public-access infrastructure directly at the inlet’s edge. The chapter’s repeated reliance on the site’s degraded upland condition risks minimizing the ecological significance of the **actual resources most likely to be affected**—namely the intertidal shoreline, adjacent estuarine waters, and the ecological functions of Bushwick Inlet as a rare urban cove supporting aquatic life and bird use. CEQR specifically warns that if the area of analysis is defined too narrowly, the project’s impacts can be diluted and appear insignificant.

Why this matters:

If City Planning accepts the premise that this is ecologically unimportant simply because the upland site is degraded, the DEIS will understate the significance of shoreline, aquatic, and habitat-function impacts in exactly the place where this project is most environmentally sensitive.

Requested correction / action:

City Planning should require the applicants to revise Chapter 9 so that it more clearly distinguishes between:

1. degraded upland vegetation on the site; and
2. the ecological significance of the adjacent Bushwick Inlet and East River shoreline and waters.

The chapter should evaluate the project against the actual resources likely to be affected, not primarily against the weakest ecological features of the upland lot.

Comment 51: The chapter treats future permitting and BMPs as though they resolve significance, rather than independently demonstrating under CEQR why impacts are not significant

Chapter / Section: Chapter 9, Principal Conclusions / Wetlands and Surface Waters / Essential Fish Habitat

DEIS Claim / Statement:

“Temporary impacts to Bushwick Inlet and the East River adjacent to Development Site due to site redevelopment, including bulkhead/revetment construction, noise, and vibration, would occur during demolition and construction activities along the shoreline.”

“Both upland and in-water construction activities would employ BMPs and would comply with all conditions, restrictions, and avoidance/minimization measures of the anticipated United States Army Corps of Engineers and New York State Department of Environmental Conservation permits for the Proposed Development.”

“Accordingly, the overall impacts to wetlands and surface water are expected to be minimal and temporary in nature...”

“Accordingly, the overall adverse effects to Essential Fish Habitat and all life stages of affected species within Bushwick Inlet and the East River are expected to be minimal and temporary in nature.”

Response:

This is one of the chapter’s central analytical weaknesses. The DEIS repeatedly acknowledges that the project would create temporary impacts to Bushwick Inlet and the East River from shoreline construction, noise, vibration, and in-water work. It then moves quickly to the conclusion that these impacts will be minimal because BMPs will be used and future permit

conditions will apply. That is not enough. CEQR requires the DEIS itself to identify, characterize, and assess impacts. Regulatory permitting may be an important later layer of control, but it is not a substitute for CEQR significance analysis.

This problem is especially acute because the chapter does not merely mention permits as one factor; it leans on them as the main reason the impacts are considered minimal. The analysis should instead explain, with project-specific detail, the expected duration, extent, seasonal timing, and ecological consequences of shoreline and in-water disturbance. For example, the chapter should say far more clearly how much intertidal habitat would be disturbed at once, how long disturbance would last, what construction windows are assumed, how turbidity and vibration would be controlled in practice, and what uncertainties remain. CEQR allows reasonable and project-specific assumptions, but it does not permit impacts to be declared insignificant simply because later permit agencies may impose conditions.

Why this matters:

If permitting is allowed to stand in for CEQR analysis, then the DEIS will not give City Planning or the public a complete, independent understanding of what this project may do to Bushwick Inlet during construction and after completion.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 9 with a fuller CEQR-based analysis of shoreline and in-water impacts that does not rely primarily on anticipated BMPs and permit conditions. The chapter should describe the likely ecological effects in project-specific terms first, and only then discuss what avoidance or minimization measures may reduce them.

Comment 52: The chapter glosses over the fact that the existing revetment is itself functioning habitat and assumes, without sufficient support, that the replacement bulkhead-and-revetment system will be ecologically equivalent or better

Chapter / Section: Chapter 9, Existing Conditions / With-Action Condition / Wetlands and Surface Waters / Marine Habitat

DEIS Claim / Statement:

“The Development Site shoreline along Bushwick Inlet and the East River has been altered with a revetment consisting of riprap, broken concrete slabs, and construction/demolition debris...”

“Vegetation observed during the field surveys within the intertidal zone of the revetment includes several species of seaweeds affixed to rock surfaces of the structure...”

“With respect to the Development Site, due to its varied rock surfaces, gaps, crevices, accumulated sediments, and affixed seaweed populations, the existing revetment that occurs within the intertidal zone along the Development Site shoreline is a source of high habitat heterogeneity for local estuarine species, including juvenile finfish, crustaceans, mollusks, and other macroinvertebrates.”

“Implementation of the Proposed Development would result in the removal of the existing shoreline revetment and construction of a new sheet pile bulkhead and rock revetment within the same general footprint as the existing revetment, thereby avoiding permanent loss of tidal wetlands...”

“Following construction, similar intertidal habitat conditions to those of existing conditions would occur along the shoreline, and a similar species assemblage is expected to recolonize the intertidal and adjacent subtidal zones.”

Response:

The chapter’s treatment of the shoreline is too confident and too simplified. On the one hand, the DEIS acknowledges that the existing revetment is not just degraded debris; it currently provides **varied rock surfaces, gaps, crevices, accumulated sediments, affixed seaweed populations, and high habitat heterogeneity** for local estuarine species. On the other hand, it assumes that replacing this system with a sheet-pile bulkhead and toe revetment within the same general footprint will avoid permanent habitat loss and will lead to recolonization by a similar species assemblage. That may prove partly true, but the chapter does not sufficiently demonstrate it.

The concern is not simply that some new revetment will be installed. The concern is that the existing shoreline has developed ecological functions over time, and a new hard-edged bulkhead system may not be functionally equivalent in the short or long term even if a rock toe is added. The chapter should have provided a more careful comparison of habitat conditions **before, during, and after** construction—including how much habitat complexity will be lost during the construction period, how long recolonization is expected to take, what evidence supports the assumption of functional similarity, and whether the new shoreline design is optimized for ecological value or primarily for structural stabilization.

This gap is especially important because the chapter itself presents the shoreline as both a degraded failing structure and a currently functioning habitat. Once the DEIS acknowledges the latter, it cannot simply assume away the ecological significance of removing and replacing it.

Why this matters:

A shoreline can be degraded and still ecologically important. If the chapter assumes ecological equivalence without demonstrating it, City Planning will lack a sound basis for judging whether the project’s shoreline intervention truly avoids significant adverse natural-resources impacts.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 9 with a more rigorous comparative analysis of the existing revetment habitat and the proposed bulkhead/revetment system, including the expected duration and extent of habitat loss during construction, the basis for assuming recolonization, and whether the post-construction shoreline will be functionally equivalent or superior from an ecological perspective.

Comment 53: The chapter understates the significance of impacts to listed fish species and Essential Fish Habitat by framing them as merely temporary and by relying on the fact that the species were not “confirmed locally”

Chapter / Section: Chapter 9, Rare/Protected Species / Principal Conclusions / Essential Fish Habitat

DEIS Claim / Statement:

“Atlantic Sturgeon ... An NYNHP species record exists for the East River, in the Development Site vicinity.”

“Shortnose Sturgeon ... An NYNHP species record exists for the East River, in the Development Site vicinity.”

“Accordingly, both species have the potential to occur seasonally in the waters adjacent to the Development Site.”

“Construction of the Proposed Development would result in minor, temporary displacement effects ... including potential temporary effects to habitat for two listed fish species that are known to occur within the East River, but have not been confirmed locally.”

“Accordingly, the overall adverse effects to Essential Fish Habitat and all life stages of affected species within Bushwick Inlet and the East River are expected to be minimal and temporary in nature.”

Response:

The chapter downplays these effects too quickly. The DEIS itself acknowledges that Atlantic Sturgeon and Shortnose Sturgeon have NYNHP records in the East River in the Development Site vicinity and may occur seasonally in adjacent waters. It also acknowledges that Bushwick Inlet and the East River provide Essential Fish Habitat for multiple species and life stages. Once those facts are established, the analysis should do much more than say impacts are temporary and that the species have not been “confirmed locally.”

Seasonal occurrence in adjacent waters is precisely the point. For mobile aquatic species and life-stage habitat, the relevant question is not whether an animal was observed at a given spot on a given survey day, but whether project timing, turbidity, vibration, noise, and shoreline work may affect habitat or use during the seasons when these species are present.

The chapter should therefore have been more explicit about what in-water or shoreline work windows are assumed, whether work would be timed to avoid periods of greater ecological sensitivity, what consultation or coordination with marine-resource agencies is anticipated beyond permit compliance, and how “temporary” effects on listed-species habitat are being judged in relation to seasonal use. Instead, the analysis uses the absence of direct local confirmation as a softening device even while acknowledging nearby records and seasonal occurrence potential.

Why this matters:

Listed species and Essential Fish Habitat are among the most environmentally sensitive resources in the record. If the DEIS minimizes these concerns through cautious wording rather than rigorous timing and habitat analysis, the natural-resources review is incomplete.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 9 with a more detailed assessment of the project's effects on Atlantic Sturgeon, Shortnose Sturgeon, and Essential Fish Habitat, including seasonal timing assumptions, construction-window considerations, and a more explicit explanation of why temporary habitat effects do or do not rise to significance under CEQR.

Comment 54: The chapter recognizes substantial local and migratory bird use but does not appear to address operational bird-collision and lighting hazards from the proposed high-rise waterfront buildings

Chapter / Section: Chapter 9, Wildlife – Birds / Existing Conditions / Principal Conclusions

DEIS Claim / Statement:

“According to this local resource, observers noted **137 avian species** at Bushwick Inlet Park ... from September 2018 to December 2024...”

“Avian species diversity at the Development Site is likely greatest during the spring and early autumn periods, when warblers and other migratory species move through and temporarily inhabit the region.”

“Beyond the Development Site, Bushwick Inlet and the East River provide important habitat for waterfowl, shorebirds, and other migratory and non-migratory birds.”

“Following implementation of the Proposed Development, improvements to habitat quantity and quality, as well as wildlife species diversity are expected, and many local species, including birds and other terrestrial wildlife, would experience increases in individual population densities due to expanded habitat opportunities.”

Response:

This discussion is incomplete because it appears to focus almost entirely on habitat removal and replacement while omitting another obvious pathway of avian impact: the operational collision and nighttime-lighting hazards associated with very large new waterfront towers. The DEIS acknowledges high local bird diversity at Bushwick Inlet Park, migratory use in spring and autumn, and bird use of the inlet and East River. But the chapter does not appear to meaningfully analyze whether the proposed towers—with extensive façades and substantial nighttime lighting potential—could create collision or disorientation risks for migratory and waterfront-associated birds.

That omission is important under CEQR's natural-resources logic because the manual expressly contemplates both **direct and indirect effects** on natural resources and includes

built resources in the natural-resources context. For a waterfront high-rise project, the natural-resources analysis should not be limited to what grows in the soil or swims in the inlet. It should also address whether the built form itself may create new ecological stressors. Here, the chapter's optimistic prediction that bird populations may increase due to expanded habitat opportunities is not enough, because it does not grapple with whether the new buildings may also create a new source of avian mortality or disturbance.

Why this matters:

A natural-resources chapter that counts habitat gains but ignores building-related bird hazards risks overstating net ecological benefits and understating operational impacts.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 9 with an analysis of potential bird-collision and lighting impacts associated with the proposed waterfront towers, and, if warranted, identify design or operational measures that would reduce those risks.

Comment 55: The chapter does not adequately address cumulative and interconnected ecological conditions at Bushwick Inlet, including adjacent park restoration, open-space use, shadow, stormwater, and shoreline change

Chapter / Section: Chapter 9, Methodology / Existing Conditions / With-Action Condition / Cross-Chapter Reliance

DEIS Claim / Statement:

“This assessment ... follows the methods set forth in Chapter 11 of the CEQR Technical Manual for identifying and characterizing natural resources, evaluating the potential for a project to result in direct or indirect effects...”

“The proposed habitat zones include lowland and upland maritime shrub and grass habitats that would mimic the native plant associations and ecologies occurring in undisturbed shoreline habitats in local coastal areas, including those currently being installed by NYC Parks at Bushwick Inlet Park.”

“As compared to existing conditions and the No-Action condition, implementation of the Proposed Development would result in minor incremental shading to Bushwick Inlet...”

“Following construction, adverse impacts due to stormwater runoff are not expected.”

Response:

The chapter describes several overlapping ecological conditions at Bushwick Inlet—adjacent habitat restoration at the Motiva parcel, the project's own maritime planting zones, incremental shadow on Bushwick Inlet, shoreline reconstruction, contaminated-soil remediation, and reliance on other chapters for stormwater conclusions. Yet it does not fully synthesize these as a cumulative natural-resources picture. CEQR requires consideration of **short-term, long-**

term, and cumulative impacts, and the natural-resources chapter should not read as though each effect can be evaluated in isolation and then pronounced insignificant.

For example, the DEIS repeatedly compares the project favorably to adjacent park restoration work, but does not seriously analyze the cumulative ecological effect of overlapping or sequential shoreline disturbance in the same inlet. It relies on the Shadows chapter for the conclusion that incremental shading is not significant, and on the Water and Sewer chapter for the conclusion that post-construction stormwater effects are not expected, but it does not itself pull those conditions together in ecological terms. Likewise, it emphasizes future native planting and shoreline stabilization while downplaying the cumulative effect of replacing an existing heterogeneous shoreline, increasing the intensity of built form and public use at the water's edge, and adding shadow and lighting associated with much larger buildings.

A natural-resources chapter for this site should not only say that each separate effect is minimal. It should explain how those effects operate together in a recovering urban estuary and whether, taken together, they may alter ecological function or resilience.

Why this matters:

Bushwick Inlet is not a generic vacant lot. It is a shoreline system already under ecological pressure and active restoration. A chapter that does not fully synthesize overlapping effects can understate the project's real ecological significance.

Requested correction / action:

City Planning should require the applicants to supplement Chapter 9 with a more explicit cumulative ecological analysis that addresses the combined effect of shoreline reconstruction, temporary habitat loss, shadow, stormwater assumptions, adjacent habitat restoration, and increased built intensity at the inlet edge.

REBNY Testimony| May 27, 2026

The Real Estate Board of New York to The City Council Subcommittee on Zoning and Franchises on the Monitor Point Project

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY appreciate the opportunity to testify at today's hearing in support of the Monitor Point Project.

Monitor Point reflects the kind of ambitious, forward-looking development New York City should be advancing to address its ongoing housing crisis. According to the Mayor's recently released Housing Plan, the City has a goal of producing 200,000 affordable units over the next decade. Monitor Point would create approximately 460 permanently affordable homes for working families in a transit-rich, high-opportunity neighborhood, all without depending on limited public subsidy resources. Importantly, the site could otherwise be developed as-of-right without any affordability obligations, making this proposal a strong example of how the ULURP process can secure substantial public benefits through private investment.

In addition to expanding housing opportunities, the project is expected to generate meaningful economic activity throughout both the construction and operational phases. Development of the site will support hundreds of union construction jobs, alongside commitments to local hiring and participation by minority- and women-owned business enterprises.

The proposal also includes significant infrastructure and resiliency improvements that extend well beyond the project site itself. Through a public-private partnership, the applicant would deliver a new state-of-the-art MTA facility, fund more than \$100 million in infrastructure upgrades prior to construction, and provide a long-term revenue stream to support the City's transit network through 100 years of rent payments. The project would further create approximately 50,000 square feet of publicly accessible waterfront open space, improve pedestrian and street connectivity, stabilize the shoreline, and establish a permanent location for the Greenpoint Monitor Museum, converting an underutilized industrial property into a resilient community resource.

REBNY believes projects that integrate housing production with infrastructure investment and public realm improvements are essential to the City's long-term economic and environmental

sustainability. Developments like Monitor Point can help ease pressure on the existing housing market, support continued workforce growth, and contribute to vibrant mixed-use neighborhoods where residents and businesses can succeed.

REBNY encourages the City Council to approve the Monitor Point application. The proposal demonstrates how private investment can be leveraged to advance affordable housing, resiliency, transit infrastructure, open space, and broader economic benefits for both Greenpoint and New York City.

Thank you for considering these points.

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**Community
Preservation
Corporation**

New York City Council Subcommittee on Zoning and Franchises

May 27, 2026 Public Hearing

Testimony submitted on behalf Rafael E. Cestero, CEO of the Community Preservation Corporation

Thank you, Subcommittee on Zoning and Franchises Chair Louis and Subcommittee Members Farías, Carr, Encarnación, Sanchez, Schulman, Thomas-Henry, Felder, and Salaam for the opportunity to submit testimony for consideration alongside Land Use Application numbers LU 0067-2026, LU 0068-2026, LU 0069-2026, LU 0070-2026, and LU 0071-2026 in support of Monitor Point, the mixed use development at 40 and 56 Quay Street in Greenpoint. My name is Rafael E. Cestero, and I am the CEO of the Community Preservation Corporation, and a former Commissioner of New York City's Department of Housing Preservation and Development.

Community Preservation Corporation (CPC) is a nonprofit affordable housing and community revitalization company that was formed in the early 1970s to help New York City and State restore and rebuild communities which were devastated by disinvestment. Today, CPC uses its more than fifty years of expertise in housing finance and public policy to expand access to quality housing, drive down the costs of affordable housing production, advance diversity and equity within the affordable housing development industry, and finance the construction of energy efficient housing. Since our founding, CPC has invested over \$16 billion to finance the creation and preservation of more than 276,000 units of affordable and workforce housing through our lending and investing platforms.

At a time when New York City faces a historic housing shortage, the Monitor Point development proposes to address a unique mix of housing, environmental, and waterfront concerns with intention and ingenuity. The Monitor Point development will deliver much needed new mixed-income housing, innovative new open space with waterfront access, environmental protection and resiliency, and a deep investment in existing community informed by a public-private partnership led by Gotham Development and in partnership with the Metropolitan Transportation Agency (MTA), New York City Housing Preservation and Development (HPD), and the Greenpoint Monitor Museum. Monitor Point will bring 1,150 new homes to Greenpoint, 460 of which will be permanently affordable at or below an average of 65% of area median income, bringing much needed housing units online at



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rents that working families can afford. And since the current site currently contains no housing units, there is no risk of harm for existing housing.

On behalf of CPC, I applaud the development team at the Gotham Organization and their partners at the MTA, HPD, and the Greenpoint Monitor Museum, in addition to the hundreds of community members who have worked tirelessly to develop a new vision for Monitor Point. I urge this committee and members of the New York City Council to support this project, approve the above-mentioned Land Use Applications, and help deliver affordable housing, open space, and a resilient waterfront to North Brooklyn.

Again, thank you for the opportunity to testify today.

RIDERS ALLIANCE

May 27, 2026

Chair Farah N. Louis
NYC Council Subcommittee on Zoning and Franchises
City Hall
New York, NY 10007

Re: Monitor Point Project by Applicants: GO Quay, LLC and the Metropolitan Transportation Authority (Applications #2025K0287 and #2024K0358)

Dear Chair Louis and Committee Members:

I am writing in support of Monitor Point, developed by the Gotham Organization, in particular to highlight the financial benefits to the MTA and, by extension, millions of public transit riders. The net proceeds that MTA receives from Monitor Point will support the MTA Capital Program, which funds essential infrastructure investments across the transit system, including station improvements, track and signal upgrades, bus facilities, resiliency improvements, and accessibility projects.

Under the lease, Gotham will make pre-construction rent payments totaling \$10.5 million before base rent begins. Once construction is complete, base rent will commence at \$2,114,275 in the first lease year and will increase by 10 percent every five years. The lease also provides for revaluations every 25 years and MTA participation in any net profits on all future capital transactions. Over the full lease term, total payments to the MTA are projected to be approximately \$710.4 million, which equates to a present value of approximately \$51.4 million using a 6% discount rate.

MTA will use a portion of the cash flow from this transaction, totaling \$22.1 million in present value terms, to fund a separate 99-year ground lease for land at 213 Meadow Street in East Williamsburg, which is owned by a third party. Gotham will construct a turnkey facility for MTA on this property. Upon completion, MTA will own that facility, representing approximately \$60 million in value.

New York's public transit riders are the beneficiaries of the MTA Capital Program. Four and a half million daily subway riders stand to benefit from station improvements and track and signal upgrades supported by proceeds from this project. Bus riders, who suffer some of the nation's slowest and least reliable commutes, will benefit from better service owing to bus facility upgrades. As you well know, with stronger storms, extreme heat and sea level rise challenging our transit system in new ways, resiliency improvements to our transit system are increasingly important to the city's survival. And of course, every New Yorker will have difficulty climbing steps at some point in each of our lives, making accessibility projects the keystone of an inclusive transit system.

Sincerely,



Betsy Plum
Executive Director



[EXTERNAL] Opposition+to+Monitor+Point+Rezoning

From Akash mahajan [REDACTED]

Date Tue 5/26/2026 12:53 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council Member,

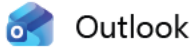
I am writing to formally express my strong opposition to the Monitor Point Rezoning proposal.

I believe that this development is not safe for our community, our environment, or future generations. Similar developments have already taken a significant toll on our local natural habitats, and it is imperative that we do better to protect our remaining green spaces. We must prioritize the long-term health of our neighborhood over these types of projects.

I urge you to consider the lasting impact this rezoning will have and to vote against the proposal. Thank you for your time and for your service to our community.

Sincerely,

Akash Mahajan



[EXTERNAL] Monitor Point Rezoning - We're tired of the overdevelopment

From [REDACTED]
Date Thu 5/28/2026 5:35 PM
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hi there,

I'm writing to express my frustration, anger and exhaustion for the overdevelopment along the Williamsburg/ Greenpoint waterfront. For over 15 years we've watched luxury high rises block views, prevent ALL people from accessing our waterfront and the areas become congested and overinflated.

Now we're dealing with an ecological disruption that could not only harm the existing and growing biosphere that has been brought back to life here, but truly risk real flooding to the area.

No one wants this development and museum. The developers haven't listened to the community. We're tired of being deceived and sold out by our elected officials. YOU can make a difference by voting NO on any further expansion. Could we just have ONE good and positive and healthy action happen for a change.

Please, vote with your heart and not your pockets.

Alexis



[EXTERNAL] Monitor Point

From Allison Maser [REDACTED]
Date Thu 5/28/2026 9:39 PM
To Land Use Testimony <landusetestimony@council.nyc.gov>

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Hello,

I am writing in strong support of the Monitor Point project and urge the City Council to vote in favor.

As someone who has chosen to make Brooklyn home, I want to see this borough continue to be a place where people from all walks of life can afford to live. Monitor Point is exactly the kind of project that makes that possible.

Monitor Point's affordability commitment significantly exceeds what is required. With approximately 40% of units permanently affordable, this project far surpasses the 25% threshold mandated by the City's Mandatory Inclusionary Housing program. Neighboring developments have not come close to that level of commitment. This is not a project that does the bare minimum — it is one that goes above and beyond for the community it will serve.

This development will not only boost the local economy and bring new storefronts to the area — it will give the essential workforce that keeps Brooklyn moving a genuine opportunity to stay in the neighborhoods they know and love.

The economic impact is significant. Monitor Point will generate nearly \$1 billion in construction-related economic activity alone, supporting hundreds of well-paying union construction jobs over the multi-year build. Once complete, the project will sustain approximately 70 permanent onsite jobs across retail, restaurants, property management, and the service sector.

The project's more than 1,100 homes — including approximately 460 permanently affordable units — will also strengthen Brooklyn's broader business ecosystem. More residents near storefronts means more daily customers for the local businesses that will fill the project's retail spaces. Units affordable to households earning 40–60% AMI will give the people who keep Brooklyn's businesses running a real opportunity to live near where they work. Our borough is losing long-term residents every year because we have failed to build enough housing for the people who serve our communities. Monitor Point begins to reverse that.

Multifamily vacancy rates sit at historic lows — just 1.4% citywide — because housing supply is not keeping up with demand. The number of units under construction has declined every year since the expiration of the 421-a abatement program, further deepening the crisis. Tight vacancy combined with insufficient supply continues to drive up rents and push residents out of the city and away from the neighborhoods they have called home for years.

As a Williamsburg resident, I am also excited about what this project means for our waterfront. Monitor Point adds 51,500 square feet of new publicly accessible open space along the water, finally connecting Greenpoint to Williamsburg by removing an outdated facility that has long walled off the waterfront from the people who live here. Alongside shoreline resiliency improvements and \$100 million in upfront private infrastructure investment — including a new MTA facility — this is one of the most comprehensive community benefit packages Brooklyn has seen in years.

This site has been zoned for residential use since 2005. The City of Yes made clear we need more housing in opportunity-rich neighborhoods, and Mayor Mamdani has committed to maximizing affordable housing production across the five boroughs. Monitor Point delivers on those promises. Replacing an industrial warehouse with mixed-income housing and public open space is exactly what this community needs.

A vote against Monitor Point is a vote to lose 1,100 housing units for New York individuals and families — including 460 permanently affordable homes. Saying no does not mean something better gets built in its place. It means this site sits idle, housing production is delayed indefinitely, and the housing crisis only deepens in the meantime.

I urge the City Council to approve Monitor Point. This is exactly the kind of project our borough needs.

Thank you,

Alli Maser

Williamsburg Resident

Hello,

I would like to submit testimony to support the Monitor Point project. I live in Greenpoint and the community impact is very important to me. The Monitor Point proposal is exceptional because not only will it boost the local economy and create new storefronts – it will give the workforce that keeps Brooklyn moving the opportunity to stay in the neighborhoods they know and love.

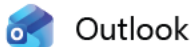
Monitor Point also brings over 1,100 homes, including approximately 460 permanently affordable, which strengthens the entire business ecosystem. The neighborhood desperately needs affordable housing, and this project will keep people in the neighborhoods they know and love.

Finally, the project adds 51,500 square feet of new public waterfront space, finally connecting Greenpoint to Williamsburg. It does so by removing an outdated facility that walls off the waterfront. I frequently run and walk my dog along the waterfront and the community has been desperately waiting for this connection.

Thank you,

Amy Stokes





[EXTERNAL] We are Opposed to Monitor Point Rezoning

From Andrea Odezynska [REDACTED] >

Date Tue 5/26/2026 4:36 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Councilman Restler,

Please "hear us" your constituents, when we say, "Enough is enough." As you know, Greenpoint has accepted 29,000 new residents in the last fifteen years. Adding three more towers on top of a fragile estuary will only serve the developer, not our community.

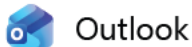
Since our fragile East River shoreline has become built up with luxury housing towers, rents are trending through the roof. Developer promises of "open spaces for all" boil down to hardscaped circular driveways. Where is the promised, normal, grassy park promised to the people of Greenpoint so many years ago? As a community, Greenpoint, keeps getting dumped on by New York City.

Why are we so unfairly burdened when no other borough or community is doing their fare share of adding housing? Greenpoint accepted thousands of new residents but municipal services are not keeping up here. Have you seen McCarren Park recently? Garbage cans overflow there most days of the week.

Please act in our defense. We are counting on you. No to Monitor Point! Thank you!

Best regards,

Andrea Odezynska
Peter Ihnat



[EXTERNAL] Opposition to Monitor Point Rezoning

From Angela Juliano [REDACTED]

Date Wed 5/27/2026 8:46 AM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hello,

I live on Freeman street in greenpoint for several years and I STRONGLY disagree with building houses on bushwick inlet. You state that we need more affordable housing due to the housing crisis, however, building luxury apartments on park land is not the way to solve it.

You know that these buildings will charge \$5,000 plus for one apartment, which most people cannot afford. What needs to be fixed is the monthly rental price of the apartments, that is the real issue causing the crisis, not the amount of apartments available. There are currently 10,000 empty apartments in NYC that landlords purposely keep empty to raise the cost of rent. We need to fix this issue and stop allowing them to cause the housing crisis- not get rid of wildlife and parks for the rest of us. Wildlife needs those parks to reduce climate change and people need these parks for mental health and to reduce climate change.

Continuing the build luxury apartments on parks and natural wildlife is ruining NYC and the authenticity it used to have. There are better ways to fix the housing problem. Just because it's easier to build doesn't mean it's the right thing to do. Saying no to building on bushwick inlet is the better long term solution, we can't just bandaid every issue, this is why we are where we are now.

Angela Juliano



[EXTERNAL] Opposition to Monitor Point Rezoning: Please listen to the Neighborhood!

From Annie Klebanoff [REDACTED]

Date Tue 5/26/2026 3:32 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council,

I'm a resident of North 7th street, in Williamsburg for over 15 years, and dear sir, we need more green space for every New Yorker to enjoy not more overpriced luxury apartments that most people can't afford.

(Hell, most developers don't even pay their fair share of taxes that they owe to the city, they just roll it over onto the next project so they always evade paying).

So enough is enough. Don't give into greed, tax evasion, and create something that will last many for many generations to enjoy.

Please do the right thing. You have the power to do what's right. Listen to your gut.

Annie Klebanoff

ARTHUR KIRMSS TESTIMONY AT CITY COUNCIL IN SUPPORT OF MONITOR POINT

My name is Arthur Kirmss, and I have been involved with the Greenpoint Monitor Museum for many years. I am submitting this letter to supplement my in-person testimony in support of Monitor Point and the Greenpoint Monitor Museum at the public hearing on May 27, 2026.

My entire formal education was in the arts and music. I graduated from the High School of Music and Art, went on to the Pratt Institute for my BFA, and studied performance of early music in the Collegium Musicum. I earned an MFA at the University of Arizona, Tucson, and at Colegio Cervantes in Guadalajara, Mexico. I have performed many concerts of Civil War music for the Museum.

I support the Monitor Point proposal because it will give the Museum a permanent home where it can continue and expand its mission. The Greenpoint Monitor Museum is an important institution in our community.

The USS Monitor was the successful defender of the Union fleet against the Confederate ironclad Merrimac during their epic battle of 1862. The Monitor was constructed and docked along the Bushwick Inlet in Greenpoint during the Civil War. The ship was designed by John Ericsson and constructed by Thomas Fitch Rowland of Greenpoint's Continental Iron Works. In 1865 Thomas Fitch Rowland helped fund the construction of the historic Church of the Ascension on Kent Street in thanks for peace at the close of the war.

The Greenpoint Monitor Museum, via its traveling roadshow, has been sharing the story of the Monitor with local schools since 2001, originally by school visits, followed by class visits to the Museum's classroom at PS110 the Monitor School, and more recently from the Museum's classroom at MS126 John Ericsson Middle School. The Museum's Roadshow school program has provided me an opportunity as a road show instructor to speak about my Civil War ancestor Ernest Wagner, who fought with the 13th New Jersey volunteer infantry in several major Civil War land battles, including Antietam and Gettysburg, and to introduce Civil War music to the students through my piccolo, recorder, and guitar, as well as Civil War songs.

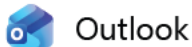
The roadshow, under the direction of Janice Lauletta Weinmann (Museum President), and George Weinmann (Museum Vice President), who are also road show instructors, has continued to present comprehensive and educational programs including live concerts and major public events, such as the 3-day festival celebrating the 150th anniversary of the Civil War, focused upon Greenpoint's pivotal role in the saving of the US Navy from destruction, by the design and construction of the pioneering ironclad battleship, USS Monitor. Our events have attracted interest and support from the local community and its leadership, as well as from state and national historic groups.

To continue and expand the Museum's educational, historic, school, and community programs, the Greenpoint Monitor Museum requires a building. Where best to found this Museum building but on the land donated to the museum by Motiva Enterprises in 2003, which is located at the Monitor's construction and launch site? The Museum has wanted to construct

this building for many years, and this proposal finally will allow us to do so. We don't want this important opportunity to pass us by.

We of the Greenpoint Monitor Museum will stand up to show New York, our nation, and visitors from every land just what our people can do, with the support we have gained. We ask that the City Council help us achieve this goal.

Thank you,
Arthur Kirmss



[EXTERNAL] OPPOSE Monitor Point Rezoning – A Giveaway of Public Land That Harms the Community

From Brigid O'Dea [REDACTED]

Date Mon 5/25/2026 4:55 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council Member Restler and Members of the Committee on Land Use,

I am writing in firm opposition to the proposed rezoning of Monitor Point at 40 Quay Street. This rezoning represents a fundamental betrayal of the public trust. **It is a giveaway of publicly owned land to a private luxury developer**, in direct violation of the community's needs and the city's own stated housing goals.

The proposed development would erect three luxury towers—21, 41, and 56 stories tall, a mere 50 feet from the shoreline of Bushwick Inlet, one of the East River's only remaining natural tidal estuaries. **Public land must serve the public good.** Any new construction on city owned land should be 100% affordable at <30% of AMI to address the severe affordability crisis we are experiencing, not the token 25% being offered here, which will likely be at an AMI that does not serve low and middle income New Yorkers.

North Brooklyn has built over 29,000 new units in the last 14 years, more than any other neighborhood in New York City. It has carried the brunt of new development. For over 20 years, 22 acres of promised parkland at Bushwick Inlet and Box Street Parks have not been delivered. Monitor Point is the last opportunity to fulfill that promise.

Adding 862 luxury units will not solve the affordability crisis; it will make it worse. This housing will not trickle down, or "filter," as the "pro-housing advocates" insist. We have seen it again and again in every neighborhood throughout the city, especially in Greenpoint and Williamsburg. Rising housing stock at the ultra-luxury end drives up Area Median Income calculations, which, in turn, raise the income thresholds used to set "affordable" rents, pricing out the very New Yorkers these programs are meant to serve.

One apartment at 79 Quay Street is currently listed at \$13,500/month. This is the trajectory that luxury development sets. Ultra-luxury housing is unattainable for 90% of New Yorkers and actively accelerates displacement and gentrification.

Bushwick Inlet is a rare natural embayment, a migratory bird stopover, a functioning estuary opening to the public for the first time in over 100 years, and a critical ecological asset in New York Harbor. More than 80% of our marine life health depends on estuaries like this one. Towers 50 feet from the water's edge would reduce this irreplaceable ecosystem to a decorative water feature.

40 Quay Street sits squarely within both the 100-year and 500-year flood zones. Building massive skyscrapers here eliminates the soft shorelines that are our best nature-based defense against rising sea levels. Protecting this land could instead provide approximately 250 acres of flood protection for surrounding neighborhoods. This is not the moment to sacrifice climate resilience for luxury profit.

I urge you to reject the Monitor Point rezoning outright. Brooklyn and NYC as a whole need parks, **deeply affordable housing for families**, ecological protection, and climate resilience—not more luxury towers for the rich.

Respectfully,

Brigid O'Dea



Brooklyn, NY 11215



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Cara White [REDACTED]**Date** Fri 5/22/2026 12:50 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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I am writing to OPOSE the Monitor Point development.

As a 20 year resident of greenpoint, the neighborhood does not need any more highrises, let alone one with such a massive height abutting one the very few parks we have. Leave us some breathing room!

The high rents in these spaces only serve to normalize and drive up rent costs in surrounding buildings both small and large, and while the minimal affordable units help those few who recieve, this creates problems for all residents in the area who face incredibly high and constantly rising rents.

This is irresponsible development and it should NOT be allowed to continue.

Respectfully,

Cara White
[REDACTED]

Statement of Carol Szumski in Support of the Monitor Point Application

To the New York City Council:

My name is Carol Szumski, and it has been my pleasure to participate in many of the Greenpoint Monitor Museum's events over the past 23 years. I am also active in many other Greenpoint community organizations. I am submitting this statement in support of the Monitor Point application because I believe in the Museum's mission and understand how Monitor Point will give the Museum a unique chance to tell the USS Monitor's story to the world.

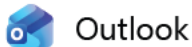
My family has lived in the Greenpoint community for five generations. I feel a strong connection to the USS Monitor's birthplace because several of my ancestors worked for the Continental Iron Works, where the Monitor was built and where it launched on January 30, 1862. I am immensely proud of my family's and community's ties to the ship that helped save the Union. The history of the USS Monitor is very important to me and to Greenpoint, and it needs to be preserved for future generations.

Our chance to preserve that history is now. Monitor Point is the best opportunity for the Greenpoint Monitor Museum to create a permanent home on its land, which it has owned since 2003. The Museum's land is not and has never been a park, but this proposal will create a significant amount of public open space on the Museum's land, which will benefit the community and provide the missing link on the waterfront between Greenpoint and Williamsburg. This waterfront open space will also connect Greenpointers and visitors alike to the Museum and the legacy of the USS Monitor at the place where the Monitor was born.

The Museum and its supporters have worked very hard to keep the history of the USS Monitor alive. For more than two decades, we have cared for the Museum and its land, with the goal of welcoming the public to this unique historical site. With Monitor Point, we can finally achieve that goal. Our community will get not only a building and funding for the Museum, but also a welcoming, educational, and resilient waterfront, and hundreds of units of affordable housing. We cannot afford to miss the opportunity that Monitor Point presents.

That's why I'm asking the Council to support this project. I am looking forward to the Greenpoint Monitor Museum having a permanent home on the Greenpoint waterfront. History needs to be shared!

Respectfully,
Carol Szumski



[EXTERNAL] Local Resident - Opposition to Monitor Point

From Caroline C [REDACTED]

Date Wed 5/27/2026 3:27 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear CM Lincoln Restler, Subcommittee Members and additional parties,

I moved to North Brooklyn in 2022 and have quickly come to appreciate the neighborhood's long history as a home for immigrant and working class communities who built and sustained the area across generations. That history also includes a strong tradition of civic advocacy, with residents consistently speaking up to protect the future of their community.

For these reasons, I am writing to express my strong opposition to the proposed 40 Quay / Monitor Point development and the associated rezoning.

Supporters of the project frame it as a **response to the housing crisis**. However, the scale, location, and housing model proposed here **fail to address the real needs of this community** and **instead risk repeating patterns that have already made Greenpoint and Williamsburg less affordable and less resilient**.

First, the location of this development raises serious concerns about both climate resilience and the responsible use of public waterfront land. The site sits extremely close to the Bushwick Inlet shoreline and lies within both the 100-year and 500-year flood zones. Sea level rise projections indicate that storm surge and chronic flooding risks will continue to increase in the coming decades, and our neighborhood has already experienced more frequent flash flooding events in recent years.

Constructing large, dense residential towers in this floodplain places future residents and surrounding infrastructure at risk while undermining long term resiliency planning. Climate experts increasingly recommend nature based shoreline strategies — including wetlands, open space, and habitat buffers — which absorb storm surge and reduce flood impacts. Hard waterfront development directly conflicts with these approaches.

Because this parcel is publicly owned land, it should be treated as a public asset and used to advance long-term public benefit. This includes prioritizing shoreline resilience, expanded open space, and community-serving uses rather than primarily facilitating private development. North Brooklyn already faces a significant open space deficit, with roughly 30 square feet of parkland per resident compared to the citywide average of about 70 square feet. The modest public access improvements proposed, such as a waterfront walkway, cannot substitute for meaningful parkland or climate infrastructure.

Second, the project relies primarily on market-rate luxury housing, a development model that has repeatedly failed to improve affordability in North Brooklyn.

Over the past decade, Greenpoint and Williamsburg have already experienced extensive luxury development. Yet affordability has worsened. According to the New York State Comptroller, median household income in Greenpoint and Williamsburg increased by 82.9 percent between 2011 and 2021, reaching \$101,400. This dramatic shift reflects how development has largely served higher income households while long time residents and small businesses have been priced out.

Luxury housing does not operate in isolation. It raises land values, increases nearby rents, and accelerates displacement pressures throughout surrounding neighborhoods. Continuing to build predominantly market-rate housing in one of the city's most rapidly gentrifying areas will only deepen these trends without meaningfully addressing the affordability crisis. While this project proposes 40% affordable housing, the majority of units would still be market-rate, reinforcing the same development pattern that has already reshaped the neighborhood's economic landscape.

Finally, the proposal does not adequately address the infrastructure and community resources required to sustainably support the significant population increase it would introduce. Adding more than 1,200 residents to this area raises important questions about the capacity of local transit, schools, and neighborhood services.

The G train, which already serves as the primary transit line for this part of Greenpoint, is limited in capacity and reliability compared to other subway lines and has long struggled to meet existing demand. Local schools, childcare facilities, and community amenities are also already operating under pressure. Large-scale residential development must be accompanied by meaningful investment in infrastructure and services, yet this proposal provides little evidence that these needs have been sufficiently planned for.

Taken together, this proposal fails to deliver on three critical priorities for our community: climate resilience, housing affordability, and the infrastructure necessary to sustainably support neighborhood growth.

I urge you to oppose the current rezoning and development proposal and instead pursue alternatives that prioritize shoreline resilience, expanded public open space, and housing that is genuinely affordable to the communities who live and work in North Brooklyn. Advocating for affordable housing should not come at the expense of the long-term sustainability and safety of the neighborhood.

Decisions about our remaining waterfront parcels will shape this community for generations. This site represents a rare opportunity to invest in long term resilience and public benefit rather than repeating development patterns that have already made the neighborhood less affordable and more vulnerable to climate risks.

Thank you for your time and consideration.

Sincerely,
Caroline Caglioni



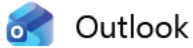
[EXTERNAL] Opposition to Proposed Monitor Point Development

From Cassandra Hughes [REDACTED]
Date Fri 5/29/2026 3:59 PM
To Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Members of the City Council,
I am a New York City resident writing in strong opposition to the proposed buildings at Monitor Point in Greenpoint. I am deeply concerned about the habitat loss and destruction of biodiversity that this development would cause in the wetland inlet area surrounding Bushwick Inlet Park.
The proposed buildings would infringe upon migratory birds' habitat, create barriers for flight paths, and increase the risk of deadly bird building collisions. This area serves as an important refuge for migratory birds, pollinators, and other wildlife in one of the most densely developed parts of New York City. We must protect the species and natural habitats we have left in New York City. I urge you to oppose this construction proposal and preserve this wetland area as protected public space for the benefit of both wildlife and the community.
Thank you for your time and consideration
Best,
Cassandra

Cassandra Hughes
BloombergNEF
[REDACTED]
[REDACTED]



[EXTERNAL] Opposition to Monitor Point Rezoning

From Catherine Fullerton [REDACTED]

Date Tue 5/26/2026 8:26 AM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hello,

I'm a constituent writing to voice my opposition to the 40 Quay "Monitor Point" proposed development that would negatively impact the neighborhood and ecosystem along the Bushwick Inlet.

This development is for luxury apartments on public land, which says enough. This district's constituents need 100% affordable housing in this development, especially given this is PUBLIC LAND. The current proposal represents a give away to rich developers, exacerbating inequality in the city.

I urge you to reject this proposal as stands. If you approve this proposal, not only have you lost a vote, I will actively support your opponent come your re-election, Lincoln.

Catherine Fullerton

[REDACTED], Brooklyn

Charles Lirio
City Council Public Hearing (May 27, 2026)
Statement in Support of the Greenpoint Monitor Museum and the Monitor Point Project

Dear Councilmembers,

I support the Monitor Point application because I am a longtime supporter of the Greenpoint Monitor Museum. I testified at the public hearing on May 27, 2026 and am sending you this written statement to complete my testimony. I am in favor of the Monitor Point project because I am excited for the Museum to finally have a permanent home on its land.

As a veteran of the United States Army Reserve and son of a World War II Navy veteran, I am passionate about US military history, particularly the history of the Civil War. I am an associate member of the Sons of Union Veterans of the Civil War and used to be a Civil War reenactor.

My love of history drew me to the Greenpoint Monitor Museum. Over the years, I have helped with the Museum's annual awards ceremony for students and assisted with special events on the Museum's land—often while wearing my Civil War reenactor's uniform.

I believe that New Yorkers deserve to understand New York's vital role in the Civil War. All of us—especially our young people—should have an opportunity to learn about how New York's people and industry saved the Union. We deserve to have a place that celebrates this part of our history, which is exemplified by the story of the USS Monitor. Monitor Point will finally make that dream a reality.

I'm also a former MTA employee. Before I retired, I put my body and safety on the line for New Yorkers as an MTA third rail supervisor. I appreciate how this application will move the MTA's mobile wash unit facility to a proper industrial area. Once that facility is moved, the MTA's land at Monitor Point can be transformed into homes for thousands of New Yorkers. These New Yorkers will be neighbors to the Museum. Their children will grow up in a place named for the USS Monitor. They will live and breathe its history.

This past Monday was Memorial Day, which began after the Civil War as Decoration Day, when people would decorate the graves of fallen soldiers. In 1873, New York became the first state to recognize it as an official holiday.

Councilmembers, I ask you to honor this year's Memorial Day by helping us create a place where the memory of the USS Monitor can forever be preserved.

Respectfully,
Charles Lirio

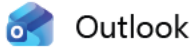
May 27th, 2026 - Subcommittee on Zoning and Franchises, 11 AM
Online Public Comment

Hello,

I am writing in opposition to the rezoning of the Monitor Point site. We need truly affordable housing, but not on wetlands in a proven flood area. Any mitigation measures like seawalls on the proposed structures would only push water to other nearby communities and businesses. We must invest in our green spaces rather than cover them in more gray. Protecting this area from large scale development is key to maintaining this area and neighborhood as a healthy place for people and the environment.

Chris St Lawrence





[EXTERNAL] Please Vote NO on Monitor Point Rezoning

From Cindy Hsiao [REDACTED]
Date Tue 5/26/2026 9:12 PM
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council Member Restler and Team,

I am writing as your constituent to strongly urge you to vote NO on the Monitor Point rezoning proposal at 40 Quay Street.

This project prioritizes oversized luxury development over public waterfront space, environmental protection, and the long-term needs of the community. It threatens Bushwick Inlet Park and one of the last remaining natural tidal inlets on the East River, while adding major density without adequate infrastructure, transit, or community investment.

The community was promised parkland and responsible waterfront planning — not massive towers that will further strain the neighborhood and accelerate displacement pressures.

I urge you to continue standing with constituents and reject the Monitor Point proposal.

Thank you for your leadership and consideration.

Sincerely,

Cindy Hsiao
Williamsburg, NY 11249

[REDACTED]
[REDACTED]



[EXTERNAL] Testimony against Monitor Point

From Cory Kantin [REDACTED]

Date Fri 5/29/2026 3:53 PM

To Land Use Testimony <landusetestimony@council.nyc.gov>; District33 <District33@council.nyc.gov>; district33@council.nyc <district33@council.nyc>

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Dear City Council,

I'm Cory Kantin, An 18 yr resident of Williamsburg, a former member of the CB1 & current member of the Land Use committee. I am a local real estate agent who specializes in selling and renting high rise towers, and I am against the Monitor Point Rezoning.

Since I moved to the community in 2008, we've built towers upon towers on the waters edge. Over 26,000 new units from 2010-2023* notably more than in any other district in the city. Since I've moved in rents have more than doubled, outpacing most areas of the city.

What hasn't been built? The centerpiece to the rezoning, Bushwick Inlet Park. The piece that relieves the density, the piece that was for the community to provide balance and green space.

NYC doesn't have a master land use plan. The city approached with piecemeal rezonings, and in this instance... **it's a rezoning on top of another rezoning. It goes back on what was previously agreed on and it's not the way to build a good city.**

It's true, we have a housing crisis, but we also have a climate crisis. **While Manhattan transforms their waterfront for resiliency, we are being asked to use our public site for housing towers**, when it could otherwise protect Greenpoint from flooding. It's hypocritical, short sighted and upsetting.

40% affordable is a majority luxury tower. It is not going to bring our rents down. It is not worthy of our public land.

We need to stop panicking; stop piecemeal rezonings that rely on for-profit developers to fix our housing crisis.

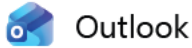
Instead, we must address the real drivers of cost: insurance, institutional landlords, utility expenses, and building codes and regulations.

40 Quay is asking for a rezoning on top of a rezoning, on top of a park, on top of a floodplain. By approving this rezoning, you're losing an opportunity to protect Greenpoint and keep the sanctity of our park.

This is not the Brooklyn that you/we want to build.

Thanks for reading,

Cory



[EXTERNAL] Vote NO on Monitor Point

From David M [REDACTED]
Date Mon 5/25/2026 11:00 PM
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Councilman Restler,

I am a longtime resident of North Williamsburg. I strongly urge you to vote against the Monitor Point development of our precious public land. Building luxury highrise apartment buildings on public land directly adjacent to the Bushwick Inlet would have many negative impacts on our community. Building expensive luxury apartments will increase the cost of living in this historic community and burden the infrastructure. Instead this public land should be converted to a greenspace that complements the Bushwick Inlet park. Our community has had so many luxury highrises built in the past couple decades. We do not need more of them, especially ones that occupy public land that should be used for public good, not corporate greed. This issue has been deceptively framed as an affordable housing issue by the developers. That could not be further from the truth.

The community is counting on you to vote NO on Monitor Point. Please protect the Inlet and protect our community from greedy outside developers exploiting our public land for their private gain. Leave a legacy by protecting our greenspace!

Sincerely,
David Marker, Esquire



[EXTERNAL] Vote NO on rezoning Monitor Point

From Debra Funkhouser [REDACTED]
Date Fri 5/29/2026 3:04 PM
To Land Use Testimony <landusetestimony@council.nyc.gov>

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May 29, 2026

Dear City Council,

I am a longtime resident of the Southside of Williamsburg, having lived here for over 30 years. I am also a volunteer gardener at the Pollinator Garden at 50 Kent at the Bushwick Inlet Park. I am very concerned about rezoning Monitor Point so that the Gotham Organization can build luxury towers on our waterfront. I think it is a terrible idea to lease our public land to a private developer so they can profit. The height of the buildings will threaten our promised park and letting go of this prime real estate will continue to drive up the cost of living in Greenpoint and Williamsburg.

Antonio Reynoso's team put together a comprehensive plan for Brooklyn, focusing on our borough's future. The plan states that "Brooklyn is ill-prepared to face sea level rises and extreme weather events." Extreme rainfall events are happening here with increased frequency. Our storm water system is built to handle 1.75 inches of rain per hour. We have been exceeding this since 1995. Hurricane Ida saw 3.5 inches of rain per hour. Basements are flooding and our subway stations and streets are compromised. John Surico and Nick Underwood's recent NYTimes pieces on The Future of NY offered 3 solutions. The first suggests that the city increases its ability to absorb water by leveraging the city's natural landscape. The Bushwick Inlet is already doing this. And though our zoning might distinguish the land on the northern edge as separate, nature knows no boundaries. Historically this land has been a waterway all the way through McCarren Park. Their third option is to retreat, which means that we relocate people out of hazardous areas. If the DCP map recognizes the threat of Greenpoint's shoreline in a flood zone, why at this moment would we choose to put our affordable housing in such a vulnerable place? It seems irresponsible.

This land is zoned as a buffer, "a sensitive transition to the adjoining neighborhood." It should stay that way. It was a part of our neighborhood's 2005 rezoning agreement which included our park as open space in exchange for the density that would come to the neighborhood with the rezoning and the towers. Adding high-rise towers to this parcel of land, land designated R6, violates this agreement. The density has come in over 29,000 new units, far exceeding projected targets and more than any neighborhood in NYC and the promised park is still lagging behind. We have waited 20

years for the Bushwick Inlet to be accessible to our community. It is a vital natural habitat. And now, just a month after its opening, we are being asked to remove park designation on lot 25 to allow for excessive height on its northern edge? It seems like a cruel joke to take away land before our promised park is realized. And should this project go through, our park will be inundated with the sound of pile driving, truck load after truck load of concrete and when it is built we will lose the view of the sky and lowrise Greenpoint forever.

The inlet is a rarity in our city. It has been fenced off for 100 years and because of its isolation from the currents of the East River, it supports a variety of life. I urge you to visit it before casting your vote. There are salamanders, flounder, egrets, horseshoe and blue crabs, oysters, clams, mussels, eels, menhaden, killfish and it's a vital destination for migratory birds. It's a place for nature to thrive. As I garden, I often see birders with binoculars. And we deserve nature in our neighborhood. Nature has a remarkable ability to heal us. The more we are connected to nature, the more chances our children will experience the awe of a ruby-throated hummingbird in its environment. Our environment. What is the price for that? The comprehensive plan states that it "can't just be buildings, we need open spaces." Per the City's environmental review standards (CEQR), neighborhoods should have 2.5 acres of open space per 1,000 people. The city average is 1.8 acres, and Greenpoint-Williamsburg is a measly 0.6 acres. The Gotham Organization has green washed their proposal with all the ecological benefits they are providing our community with their 3 buildings. It's insulting. Claims to be adding 45,000 sq. feet of open space are a street extension and an esplanade composed mostly of hardscape. This is the bare minimum, not actual parkland with athletic fields & courts, play areas, lawns and gardens. They are co-opting our existing park and claiming it as part of their contribution, using popular buzz words like native plants, but in reality they are taking away from our park and giving us wind tunnels, driveways and narrow landscaped walkways to doorman buildings that will add to our heat index and ultimately threaten the inlet.

I know there is a big push to add affordable housing units to our city. We elected our mayor for this reason, but Monitor Point is not the right land. We shouldn't be asked if we want to have affordable homes or open spaces. That is a false equivalency. I want both. I think it is possible to create affordable housing in this city without compromising our promised park. Don't let the Gotham Organization use affordable housing as a carrot. It's a Trojan horse. 25% affordable housing is what is required, and this new promise of adding an 15% is not officially in their ULURP and would be paid by the public. The majority of units will be at market rate. Zillow has a 3 bedroom apartment on the water going for \$15,750/month and a one bedroom at \$8,000/month. That is not affordable. It may seem that the more housing we create will tip the balance of supply and the rents will go down. But that hasn't happened here. I have been in this neighborhood for 30 years. The rents have gone up considerably since the zoning laws in this neighborhood changed and the towers were built. Real estate in this city is predatory. Our neighborhood has been on the forefront of development for NYC but we are on a world stage. The more luxury condos built on our waterfront with views of Manhattan, the more second and third time homeowners make smart investments. The more luxury rentals on our waterfront, the higher the threshold for what a one bedroom apartment will go for in Greenpoint and Williamsburg. If we are to build housing on this public property, it should be 100% affordable.

I want affordable housing. Put it in my back yard. There are buildings throughout the southside where investors hedged their bets and bought up buildings and used them to leverage other projects only to go bankrupt. I'm thinking of the building on Roebling and Hope that started to fall apart from neglect. Parapet bricks falling down onto the sidewalk. How long will that be unoccupied? How long will the

scaffolding stand? Can we ask Gotham to buy that land? It's on higher ground and closer to transit. Can we have a more nuanced approach than the old - take our open spaces and give them to developers, give them tax incentives in exchange for promises that are never realized because those developers go bankrupt and sell to other organizations that are free to build high without the same restrictions? Let's learn from our neighborhood's past mistakes. The comprehensive plan stated, "Currently, the City relies almost entirely on the private sector to build housing." I like their Public Land for Public Good, "prioritizing Community Land Trusts and nonprofit developers when disposing of City-owned property." The MTA has the right to transfer land to other public agencies.

The MTA is not looking after the neighborhood's best interest. In the transportation section of the FEIS, they neglect to study the L train. By studying only two stations on the G train and omitting the L train, they severely neglect to include the main way our community gets into Manhattan or travels deeper into Brooklyn. They underestimate how many will use the subway during peak hours. 456 people travelling out by subway during weekday AM peak hours seems low to me for a building with 1150 units. Habits have drastically changed and people are back in offices. In order to appreciate the density and the vitality that is already in our neighborhood, the MTA should use its own data showing Greenpoint Ave station saw a 23.5% increase in ridership in 2025. It should also use the data from the Permanent Citizen's Advisory Committee for the MTA which reported that "The Bedford Avenue L station had the largest overall increase in rides on weekends in 2025 with 555,760 new riders, a 23.7% increase, outpacing even tourist hubs like Times Square." This significant increase in overall ridership and lack of promised open space needs to inform this decision.

Also, missing in the FEIS are the compounded effects from all other new buildings north of Monitor Point together with this project on the vulnerable inlet, specifically the pollution from Combined Sewer Overflow outfalls. The mouth of Bushwick Inlet contains two of them. The dEIS recognized that "during large storm events, excess flow from the combined sewer system would bypass the regulator and flow into the East River." But the MTA needs to consider the USACE design plans that propose creating drainage for Newtown Creek when the storm surge gate is closed. How will this burden the inlet and the nearby East River shoreline with additional volume of contaminated wastewater? Are there plans for mitigation? Is Monitor Point treating its own wastewater? How will tall waves react to the hard surface of a bulkhead during storms? Further analysis should study the effects of installing a bulkhead on the Monitor Point side, but not on the inlet side and how that will impact the neighborhood inland of Monitor Point when flooding occurs from storm surges and sea level rises.

The FEIS repeatedly states that the Monitor Point project will add "needed vitality" to the neighborhood. Our neighborhood is not lacking in vitality. We are lacking in parks. Instead of comparing the existing Gotham Proposal against doing nothing, the MTA should provide the community with another realistic alternative within the original parameters of R6, which could involve building 14 stories of affordable housing, or possibly extending Bushwick Inlet Park onto these public grounds and allowing for a natural resilient coast. It may seem like an immediate win for affordable housing and for this administration hitting their projected goals to push forward with this development. And to those few people who win that lottery, it just might be a win. But I imagine those individuals will also have to compromise on the number of bedrooms that they can afford versus what they truly need. The parents will give their kids the one bedroom and sleep on the couch in the living room every night. They will go out into the park to escape those close quarters like I did with my kids in my tiny apartment. They will meet their neighbors in these open spaces and create long lasting friendships. Let's choose to be stewards of the land this time. Let's not put affordable housing units in

a flood zone. Let's not build one of the tallest buildings on the waterfront that will dwarf our park. Let's not compromise. Let's use our public land for public good. I trust it will pay off in the long term.

Sincerely Yours,

Deb Funkhouser

Dennis J. Duffy
Written Statement for the May 27, 2026 City Council Public Hearing
In Support of Monitor Point

Dear members of the City Council,

My name is Dennis J. Duffy and I strongly support the Monitor Point project at 40 & 56 Quay Street. I ask the Council to approve this project, which will create a permanent home for the Greenpoint Monitor Museum. I write this letter in honor of my great-grandfather William Singer (shot at the Civil War battle of Cold Harbor) and his father who never made it home.

I attended high school in Brooklyn in the 1950s and look forward to the day that Brooklyn students' patriotic field trips will bring them to the Greenpoint Monitor Museum, in addition to the Prison Ship Martyrs Monument (Fort Greene) and Greenwood Cemetery, where the Patriot stand permitted Washington to evacuate his troops to Manhattan, preventing the Revolution from being strangled in its cradle. The arrival of the Monitor at Hampton Roads was no less consequential for our nation. The creation of the Greenpoint Monitor Museum will ensure that the Monitor's legacy is remembered by the children of Brooklyn for generations to come.

This project is also important because it directly addresses the city's top priority: permanently affordable housing.

Other key community benefits include:

- 1,150 new homes with 40% permanently affordable (460 units for households at 40-60% AMI)
- Removes industrial truck traffic from residential streets
- 51,500 sf of waterfront open space connecting Bushwick Inlet Park to northern areas
- \$300,000 annual funding to NYC Parks for Bushwick Inlet Park maintenance
- Enables Box Street Park by relocating MTA's Emergency Response Unit

We need housing solutions and have an opportunity to open up the waterfront to new neighbors without displacing any residents. In fact, Monitor Point transforms an underutilized industrial site into community assets through \$700+ million in private investment.

I urge you to support this project, which will deliver the affordable housing, open space, and infrastructure improvements the city needs, all while honoring the Monitor and Brooklyn's contributions to the Civil War.

Sincerely,

Dennis J. Duffy

Elizabeth Ronchetti
Testimony in Favor of the Monitor Point Application
City Council Hearing, May 27, 2026

Dear Councilmembers,

My name is Elizabeth Ronchetti. I am a founding member of the Greenpoint Monitor Museum and I have been its Secretary since its creation in 1996. I write to express my strong support for the Monitor Point proposal, which will create a permanent home for the Greenpoint Monitor Museum.

Decades ago, I was a founding member of the Concerned Citizens of Greenpoint, along with Irene Klementowicz, Stella Harmatiuk, May Sheridan, and Alice Wilkowski. The Concerned Citizens of Greenpoint is a historic grassroots organization that fought against industrial pollution and toxic waste in our neighborhood. We successfully pushed for cleanup and community improvements, demanded a healthier environment and influenced policy against major polluters. In 1994, we were instrumental in shutting down the infamous Greenpoint Incinerator. I know how important environmental issues are to Greenpoint and I am committed to the health of our community and our planet.

The Greenpoint Monitor Museum is part of that history. The Museum's property on Bushwick Inlet was previously owned by the oil company Motiva Enterprises, which donated it to the Museum in 2003. The land has always been private property. For many years, it was industrial property, and it certainly has never been a park. The Museum has worked very hard to care for this land over the years, including its shoreline. In 2015, shortly after the Museum was informed that the City no longer intended to acquire the Museum's land, the Museum won a grant for nearly \$600,000 from the Greenpoint Community Environmental Fund, which it used for shoreline restoration work. However, the shoreline needs additional investment for more significant restoration.

Now, we have an opportunity to make this once-industrial shoreline resilient and to open it to the public. The renewed waterfront will provide seating and picnic space where Greenpointers and visitors can sit and enjoy Bushwick Inlet. It will have shade from native plantings, a waterside amphitheater where school and community groups can gather and learn, and historic markers to celebrate the U.S.S. Monitor and the history of the site. This public open space will connect Greenpoint's industrial past to its climate-resilient future.

This proposal is our best opportunity to bring this vision to life. Monitor Point will allow us to build a permanent home for the Museum, restore the shoreline and transform the public waterfront space.

I want to see the people of Greenpoint enjoy this waterfront and everything else that the Museum has to offer. That's why I ask you to support Monitor Point.

Thank you for your consideration,

Elizabeth Ronchetti



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From elizabeth thompson [REDACTED]**Date** Tue 5/26/2026 12:45 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Councilman Restler,

I strongly oppose the rezoning of Monitor Point.

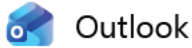
I have lived in Greenpoint for over 20 years and this neighborhood is unrecognizable now. I understand the city's need for more housing, but this plan does not contribute in a meaningful way to solving the housing crisis and the Greenpoint community has done enough to shoulder the city's increasing need for housing - affordable or otherwise. Between 2010 and 2020, Community Board 1 added 18,500 units of a housing. We've done our part. Leave this parcel alone. It abuts a (now) magical and rare kind of access to the water -- an inlet which enables visitors to connect with a tranquil estuary filled with wildlife. It is a break from the frenzied and dangerous torrents of the tides and currents of the East River. An oasis in the urban jungle.

Thank you for your consideration.

Your voter,
Elizabeth Thompson

--

Elizabeth Thompson
[REDACTED]



[EXTERNAL] Monitor Point Rezoning

From erez horovitz [REDACTED]

Date Wed 5/27/2026 3:00 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Representative Restler,

I have been a Greenpoint resident since 2011, and I write — somewhat uncharacteristically — to urge you to oppose the sale of this public land for private residential development.

Once the land is surrendered for development, it will likely never be undeveloped. If instead we turn it into a public green space, that would bring lasting value to a neighborhood already critically short on parks — while having no shortage of large waterfront apartment buildings.

One of government's most important responsibilities is to exercise vision beyond immediate financial gain. That we would voluntarily develop publicly owned land for the same reasons a private developer would is deeply disheartening. The longer term good of this community deserves to outweigh short term profit.

If we, as a government, cannot commit to creating green space for our residents, no one else will. I appeal to your sense of that responsibility.

Thank you for your time and consideration.

Sincerely,

Erez

--

Erez Horovitz
[REDACTED]



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Eric Lefcowitz [REDACTED]**Date** Tue 5/26/2026 7:31 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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I am strongly opposed to the Monitor Point, a mega-project in an environmentally-sensitive flooding zone. The project is "affordability-washing" at the expense of the neighborhood's livability. Where does this end? With Greenpoint becoming Miami Beach?

Eric Lefcowitz



Greenpoint



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Eric McAllister <[REDACTED]>**Date** Fri 5/22/2026 12:42 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Please, please, please maintain your opposition to the Monitor Point rezoning. Not enough affordable housing, massive, out of place skyscrapers and most importantly: WE NEED PUBLIC WATERFRONT. Keep up the fight Lincoln!!!!

Best,
Eric McAllister
Leonard St Greenpoint

Good morning, Chair Louis and members of the New York City Council Subcommittee on Zoning and Franchises.

My name is Erin Drinkwater. Having previously served in leadership roles at New York City's Department of Social Services (DSS), I have worked directly to address housing instability, homelessness, and the systemic failures that continue to push New Yorkers into crisis.

I am here today to support the Monitor Point applications. From my perspective, this project represents an urgent necessity for New York City: deeply affordable housing paired with meaningful public investment. This includes relocating the MTA Wash Station to a more suitable location and making significant improvements to our beloved waterfront.

The most critical fact before this body is that this project delivers approximately 460 permanently affordable homes—40% of the total project—including a substantial number of units targeted at 40% and 60% of the Area Median Income (AMI). We must absolutely press to increase the affordable units in the project, but given the nature of the project and dependencies, we cannot afford to delay approval.

With six years of service on the Community Board, I know that this distinction matters enormously. For too long, we have asked, "affordable for whom?" This project provides the very units we have consistently advocated for.

My experience at DSS and DHS taught me that there is a profound difference between housing labeled "affordable" and housing that is actually accessible to working-class New Yorkers, seniors on fixed incomes, and families at risk of entering the shelter system.

Greenpoint is a neighborhood of broken promises across multiple administrations. Much of the housing produced after the 2005 rezoning failed to meet the needs of existing residents in Greenpoint and Williamsburg. While we now have better tools to encourage deeply affordable development, communities were once promised affordability only to receive housing that was out of reach for those who built this neighborhood.

As a 20-year resident of Greenpoint, I have seen the long-term effects of the 2005 rezoning firsthand, including the heartbreaking delays in realizing Bushwick Inlet Park in a neighborhood starved for green space.

However, we cannot let the perfect be the enemy of progress. We must act with an urgency that matches the scale of this crisis. Last night, the shelter census reached nearly 83,000, with almost 100 families requesting shelter last evening¹. We will not solve this crisis overnight, but Monitor Point represents essential progress.

¹ <https://www.nyc.gov/assets/dhs/downloads/pdf/dailyreport.pdf>

As a city, we must collectively demand more. We must protect existing affordable units and levy significant penalties against landlords who fail to maintain properties or illegally convert units². We simply cannot afford to lose the housing we already have.

While I understand the desire for this project to go even further, we must utilize every existing and new tool available to address this crisis head-on. This proactive approach is reflected in the housing plan released yesterday by the Mayor and Deputy Mayor for Planning and Housing Lelia Bozorg.

Importantly, this project is not solely about housing density.

Beyond housing, Monitor Point delivers over 51,000 square feet of publicly accessible waterfront open space, resiliency infrastructure, and shoreline stabilization. It also provides funding for Bushwick Inlet Park, unlocks access to Box Street Park by relocating the ERU facility, ensures environmental remediation, and provides a permanent home for the Greenpoint Monitor Museum.

This project addresses multiple long-standing community issues simultaneously: housing affordability, waterfront access, environmental cleanup, and public infrastructure.

A "no" vote does not produce a more affordable proposal; it preserves the status quo and fails to deliver the park or the housing this site needs.

Conversely, a "yes" vote delivers deeply affordable housing, public waterfront access, environmental improvements, and meaningful long-term community benefits.

At a time when New Yorkers are struggling, neighbors are unsheltered, and families are being priced out of our city, we must move forward with projects that create real affordability at scale.

I respectfully urge the Council to support the Monitor Point applications before you today.

Thank you for your time and consideration.

² <https://hellgatenyc.com/sro-125-bowery-illegal-demolition-homeless-tenants/>



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Gabriel Williams [REDACTED]**Date** Wed 5/27/2026 7:17 AM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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I have lived in Greenpoint since 2004. I have been waiting for promised parks since then. We have gotten continuous large residential construction projects since then. The monitor point proposal maintains the status quo. No park, more rich transient neighbors, more construction looming over scraps of park along the river.

We have had the inlet park for months. Now we are looking at years of construction overhead in the tiny piece of green we have along the river.

Please vote against the rezoning. We have enough luxury glass skyscrapers along the river. Encourage the developers to build affordable housing on another site in greenpoint.

Thank you very much

Gabe



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From George Korin [REDACTED]**Date** Tue 5/26/2026 12:41 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hi

Jeanne, Darius, Adrian and I oppose the Monitor Pt project as it has been rendered. Rents in Greenpoint are too high.

That project should offer more affordable units than are being proffered by the developer. As it is situated on public land, we in the community should have a louder voice.

Also, BIP should be completed for the community before this project breaks ground.

George M Korin DVM

**Testimony of GEORGE J. WEINMANN in FAVOR of the MONITOR POINT PROJECT
(City Council Hearing, May 27, 2026)**

My name is George Weinmann and I am the Vice President of the Greenpoint Monitor Museum. I am a historian, a professional genealogist and expert witness for estate cases, and an officer and member of many historical, patriotic and genealogical organizations.

I was born and raised in Greenpoint where my family has lived since the 1840s. Many of my ancestors fought for the Union during the Civil War. I even had a relative who served on the USS Monitor, Assistant Surgeon Grenville Weeks. Yes, I am proud to say I am from Greenpoint Brooklyn and even prouder to help carry forward the legacy of the USS Monitor, the ship that saved the Union.

I have been working with the Greenpoint Monitor Museum for 30 years. The Museum is very personal to me as I met my wife Janice while working with the Museum. Over the years, we have worked very hard to care for the Museum's land on Bushwick Inlet and to share the Monitor's story with the community. I have maintained, supervised and organized museum events on the Museum's land on the Bushwick Inlet. We have collaborated with other organizations for these events, such as the Billion Oyster Project, City of Water Day, Friends of Bushwick Inlet Park and the Sons of Union Veterans of the Civil War. We have done our best to be good neighbors and to serve our community.

Since 2001, we have taught thousands of local school children who now have children and grandchildren that attend our classroom. These children and their families come from all walks of life including cab drivers, deli workers, firemen and policemen to name a few. They see me and Janice on the street and they remember us as the Monitor people, and they ask us "When will the museum be built?" We have told them that we are going to build a museum on our land that shares the launch site of the USS Monitor and we don't want to let them down.

If you do not vote yes to Monitor Point, there will be no Museum building or open space on the Museum's land. Under the current R6 zoning on the MTA site, a developer could build a luxury building with no or very little affordable housing but the Museum would get nothing and its land would remain closed off. A no vote does not create anything for the community. But a yes vote will create affordable housing, open space, and a home for the Museum.

After the Monitor sank, my ancestor Assistant Surgeon Grenville Weeks wrote: “so long as we remain a people, so long will the work of the Monitor be remembered, and her story told to our children’s children.” That’s what the Museum does. Please help us keep telling the Monitor’s story to the people of Greenpoint, New York and the world.

PLEASE VOTE YES for Monitor Point and the Greenpoint Monitor Museum.

Thank you,
George J. Weinmann



[EXTERNAL] Opposition to Monitor Point Rezoning

From Me [REDACTED]

Date Tue 5/26/2026 1:09 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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WHY THE 40 QUAY “MONITOR POINT” PROPOSAL IS BAD FOR THE INLET, THE PARK, AND THE NEIGHBORHOOD

This is a **giveaway of public land** to a private developer proposing three luxury towers **21, 41 and 56 stories tall** just 50 feet from the shoreline of **Bushwick Inlet**, one of the East River’s only natural tidal estuaries.

This land belongs to the public and must serve the **public good**, not private luxury development.

Additionally, between 2010 and 2020, Community Board 1 — which encompasses Greenpoint and Williamsburg — added 18,500 units of affordable housing .

I have lived in Greenpoint for 25 years and this increase in density is ecologically unsustainable.

Please vote ‘NO’ on this development.

Respectfully, Geraldine Erman



[EXTERNAL] Opposition to Proposed Monitor Point Development

From Hayley Slusser [REDACTED]
Date Fri 5/29/2026 3:35 PM
To Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Members of the City Council,

I am a Greenpoint resident writing in strong opposition to the proposed buildings at Monitor Point in Greenpoint.

I am deeply concerned about the habitat loss and destruction of biodiversity that this development would cause in the wetland inlet area surrounding Bushwick Inlet Park. Just the other day while visiting the park, I saw a red-tailed hawk there. It is upsetting to think about how these new buildings would infringe upon its habitat, create barriers for flight paths, and increase the risk of deadly bird-building collisions. This is the fate that many birds and wildlife species using Bushwick Inlet Park could face if this construction is approved.

This area serves as an important refuge for migratory birds, pollinators, and other wildlife in one of the most densely developed parts of New York City.

We must protect the species and natural habitats we have left in New York City. I urge you to oppose this construction proposal and preserve this wetland area as protected public space for the benefit of both wildlife and the community.

Thank you for your time and consideration.

Best,

Hayley Slusser
Greenpoint Resident



[EXTERNAL] Opposition to Monitor Point Rezoning

From Helen Chang [REDACTED]

Date Tue 5/26/2026 1:06 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Mr. Restler and City Council Members,

As a resident of Greenpoint/Williamsburg for over 20 years, I am writing in strong opposition to the Monitor Point Rezoning.

Our neighborhood has already completed the most new housing units in the city in the last 10 years - without any meaningful increase in public park space. This public space is critical to the long promised park land (most of which has not been completed) in exchange for the 2006 rezoning. We have been waiting for our parks to be completed for 20 YEARS now. Enough is enough. Even though we have added an extraordinary number of mostly market priced luxury units in Greenpoint/Williamsburg - our residents have way less open green space than average NYC residents. We simply cannot sustain another 1,200 units worth of residents stuffed into 3 towers 50 feet away from the shoreline. We need more natural open spaces, more athletic fields, more dog runs, and more playgrounds and park space - NOT MORE TOWERS. To take public land, that should be used for public good, and turn it into a giant real estate development site is UNACCEPTABLE.

Whether these units are affordable or not (which they should be), 1200 IS TOO MANY. **PLEASE PROTECT THE INLET AND FINISH BUILDING OUR PARKS!**

Wondering where are waterfront front parks are,
Helen Chang





[EXTERNAL] Opposition to Monitor Point Rezoning

From Helena Yang [REDACTED]

Date Tue 5/26/2026 8:56 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hi,

I'm Helena and I am a resident and property owner living in North Williamsburg. I live about a 5 min walk from the Monitor Point proposed site. I urge you to vote NO on the Monitor Point rezoning. Over 5,300 residents have signed a petition demanding this land be protected. That is the community speaking clearly.

Data shows Greenpoint-Williamsburg has just 0.6 acres of open space per 1,000 residents — less than a quarter of what city standards require. Bushwick Inlet Park was promised to this community over 20 years ago and remains unfinished. Monitor Point would not fulfill that promise. What the developer calls "open space" is just a street extension and a narrow esplanade. That is not an actual park space that people would enjoy, it's just a small sidewalk with better branding.

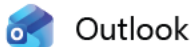
As a property owner in North Williamsburg, the Bushwick Inlet and surrounding park has been an essential part of connecting with nature and community close by. It provides a space for people to gather and actually take a breath. By obscuring the open space with another looming high rise, it takes away a space for the community and residents to be able to take their kids to play and for people to enjoy what little bit of nature we have in the city. It is home to diverse wildlife that we must preserve and protect.

Furthermore knowing fully well that the climate crisis is only accelerating, this plan is irresponsible. With inevitable rising water levels from the East River, and severe storms, building housing by the water is a waste of resources and money. It is NOT a sustainable or safe long term solution for anyone. This would put thousands of individuals in dangerous constable flood zones. Of course I am for affordable housing, but not in an area that is susceptible to flooding and is a unique nature haven that needs to be protected.

This entire process has been rushed and the community has still not seen a clear plan of what the building or park would even look like. The hearings are also when most of us are busy at work and can't attend the hearings!

Bushwick Inlet is one of the East River's last natural tidal estuaries — a migratory bird corridor, a rare marshland, and a living coastal buffer. This site sits in the 100-year flood zone. Your Plan calls for nature-based flood defenses and protection of soft shorelines. Building luxury towers 50 feet from this shoreline is not resilient. It is recklessness — and it directly contradicts the values your Plan champions. Vote NO on Monitor Point. Finish the park and keep the promise!

Thank you,
Helena Yang



[EXTERNAL] Opposition to Monitor Point Rezoning

From Ida Marx [REDACTED]
Date Tue 5/26/2026 9:47 PM
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Mr. Restler,

I strongly oppose the rezoning and massive development proposal at 40 Quay in Greenpoint. The waterfront in Greenpoint has already been massively overdeveloped with luxury high rise buildings. We have not yet even witnessed the impact this will have to our infrastructure and quality of life, as the huge number of new high rise towers are not yet even fully inhabited. The Monitor Point development will endanger the limited wildlife and ecosystem by the water, one of the East River's only natural tidal estuaries. There are countless other open areas in Greenpoint near McGuinness Blvd. that could be developed, and they would not create this environmental impact, and strip away the already limited greenspace available.

The Affordable Housing initiative is just an excuse to construct more luxury housing, and will not benefit the working people of Greenpoint who are not wealthy. I personally live in an "affordable unit" that was built in Greenpoint for middle to lower income people. The overall impact of the enormous and out-scale luxury high rise buildings in Greenpoint have caused all rents to soar over 60% since 2020. This project will continue to create an unaffordable neighborhood for our community which is pricing out those of us who are not wealthy! How does it help the community to add affordable housing if it also continues the trend of driving up the cost of living for everyone?

As a life-long New Yorker who has spent most of my life working for community programs, I know this is not the direction that benefits New Yorkers. The project at 40 Quay serves mainly wealthy people, many of whom do not even live in New York full-time, nor do they contribute to our community.

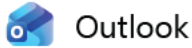
We need to preserved whatever limited greenspaces we have left, and begin serving the community that is already here by building a park space for the community! Please don't contribute to the further destruction of Greenpoint. I assure you my voting decisions are based on issues such as this.

Thank you,
Ida Marx

[REDACTED]

--

Ida Marx, MPS, LCAT, ATR-BC, ADHD-CCSP



[EXTERNAL] Opposition to Monitor Point Rezoning

From J Des [REDACTED]

Date Sat 5/23/2026 1:47 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Good Afternoon,

As a long term resident, I oppose the current plan to rezone Monitor Point. Our community needs to preserve wildlife, to expand parks and green spaces for recreation, to build quality dog parks, and to provide actual affordable housing for the working class and middle class communities of Greenpoint.

The current developments exclude many who have made this neighborhood their home for decades. Giving preference to developers who use public funds and land and make grand promises for parks and community spaces has not been delivered thus far. For example, the promise to build the community Box Street park has yet to begin... This demonstrates how developers exploit public spaces to their advantage and do not consider the actual communities they build around, nor the needs involved.

What those of us have seen from these luxury developments is a failure to provide adequate affordable housing for working class and middle class residents.

In addition, many of the people moving here are transient and do not invest in the neighborhood. We also have MANY dogs in this area without parks dedicated for dogs, and there has been harassment, dog waste garbage everywhere and growing contention since there are no dog parks here for the amount of dogs. BUILD ADEQUATE DOG PARKS!

Many people who live in those luxury towers now call this area "garbage luxury." Developers do not maintain those buildings properly, causing people to come and go.

While there certainly have been benefits such as the creation of access to the waterfront, for some, the problems being created are multiplying.

Testimony of James Olszewski in Support of the Monitor Point Project

Please consider this testimony in support of the Monitor Point development project.

I am from Greenpoint and I hear the concerns of those worried about another large development project taking shape on the Brooklyn waterfront, but this is not a typical project, as it will support our community in multiple ways. This includes the replacement of the antiquated MTA Mobile Wash Unit, providing substantial affordable housing and the closest to my heart, the fulfillment of a decades-old dream of providing a permanent home for the Greenpoint Monitor Museum.

As a high school Social Studies teacher, who has had the pleasure of escorting students to historic sites across Europe, I am humbled by the prospect of being able to educate students at a historic site in our own backyard. In the past, our city has not done a great job preserving its historic legacy like the major revolutionary centers of Boston and Philadelphia. To that end, it is important to be able to have a place to continue to tell the role that the Greenpoint neighborhood played in bringing about an end to slavery for generations to come.

James Olszewski



[EXTERNAL] Opposition to Monitor Point Rezoning

From Jane [REDACTED]

Date Mon 5/25/2026 5:21 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Ms Restler & the NY City Council,

The 40 Quay “Monitor Point” is bad for the Greenpoint/Williamsburg neighborhood, the Bushwick inlet & the park. Once again, a private developer has been “given” public land – 3 towers, 50 feet from the shoreline of the inlet. This land belongs to the public for public good, not for private luxury development.

Why? Here are a few reasons:

Ecology & Flood Risk: Bushwick Inlet is a rare ecological treasure & an important habitat in the harbor and home to diverse wildlife. This project will be built within a 100-year flood zone. A huge skyscraper will work against nature-based defenses that would protect the neighborhood. Think Hurricane Sandy. Moving an MTA infrastructure from a coastal flood zone to another near superfund Newtown Creek is irresponsible. That’s reckless.

Parks & Housing: In the last 14 years, this neighborhood has experienced more new units than any other neighborhood in NYC – 29,000 new units. We are no longer an “underperforming” home construction district. Greenpoint-Williamsburg is on steroids.

My neighborhood has not received adequate parks/open space – CEQR has determined neighborhoods should have 2.5 acres of open space per 1000 people. Greenpoint/Williamsburg has 0.6 acres per 1000 people and the city average is 1.8 acres. In other words, the 3000 new residents in this new complex would be creating 300,000 square feet of new open space.

The developer’s plan includes 25% “affordable housing” units. This is the minimum quantity required by the City’s zoning resolution. I quote: “New building on PUBLIC LAND should be 100% affordable. This neighborhood is saturated with luxury housing stock. Average median income which determines affordable housing rental rates has increased. In other words, at \$13,000/month rent for 79 Quay (across the street from 40 Quay), Monitor Point worsens the housing crisis for the 90% that cannot come close to affording that amount of rent.

40 Quay-Monitor Point is an outrageous oversized complex creating the tallest towers and apartments for the wealthiest minority in this neighborhood. We are overwhelmed by the number of new apartments that are not considered affordable. This is not neighborhood improvement.

We want more open space, nature-based resiliency solutions to protect the ecosystem and shore line protection. Think Lover Manhattan Coastal Resiliency Plan, Hunters Point Wetland and NY Harbor Living Breakwaters Project. We need true AFFORDABLE housing not more luxury housing that most people cannot afford. Private luxury development deals is no longer a creative solution.

Please listen to the people. I have lived in this neighborhood for 32 years and have seen a lot of change. I repeat: The 40 Quay "Monitor Point" is bad for the Greenpoint/Williamsburg neighborhood, the Bushwick inlet & the park.

Thank you,
Jane Bottner



Testimony of JANICE LAULETTA-WEINMANN in FAVOR of the MONITOR POINT PROJECT (City Council Hearing, May 27, 2026)

Dear Councilmembers,

I am Janice Lauletta-Weinmann, the President and co-founder of the Greenpoint Monitor Museum and a life-long Greenpoint resident. I retired from the US Army Corps of Engineers in 2023 after 35 years of service as a civil/structural engineer. While working for the USACE I worked on diverse projects including flood control seawalls/bulkheads, sustainability including solar energy, and building construction at military installations.

The Museum received its Provisional Charter from the State Education Department of the University of the State of New York on April 24, 1996. 2026 marks the Museum's 30th Anniversary. For the past 30 years, the Museum has educated Greenpointers about the USS Monitor and how the people of Greenpoint and Williamsburg helped save the Union during the Civil War by actually building the USS Monitor. We teach students history, engineering, and pride in their community through the story of the Monitor. I aim to awaken students' interest in engineering by incorporating both steam and solar energy into the program, since John Ericsson, the designer of the USS Monitor and its steam engine, also experimented and worked with the development of a solar engine.

I have a master's degree in education. Since 2001 I have served as an instructor for the Museum's Road Show School program, through which we visit local schools dressed in Civil War uniforms. The Museum previously had a classroom at PS110 the Monitor School and we now have our own classroom at MS126 John Ericsson Middle School.

The Museum has owned its land since 2003, when Motiva Enterprises donated the land to be the site of a future Greenpoint Monitor Museum Building at the launch site of the USS Monitor. Since then, we have been fighting to make that goal a reality.

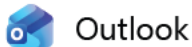
In 2005 we learned that the City planned to acquire the Museum's land by eminent domain. The Museum spent the next 12 years fighting the condemnation action. Today, the Parks Department has confirmed in *three separate letters* that the City has no intention of acquiring the Museum's property. We are tired of fighting off threats to the Museum's land. We want to focus on our educational mission.

The Museum's land is recognized as a historically significant site: in 2015 the National Oceanic and Atmospheric Administration's USS Monitor National Marine Sanctuary dedicated a USS Monitor trail marker on this land to link it to other historic sites related to the USS Monitor. As Motiva recognized when it donated the land, it is the right spot for the Museum to have its permanent home. We are asking for the Council's support to help us make the Museum's building possible by approving the Monitor Point project. Monitor Point will also create much needed affordable housing and a stabilized waterfront public access area.

This is a critical moment for the Museum's future. Please help us secure a permanent home for the Museum on its land.

PLEASE VOTE YES
for Monitor Point and the Greenpoint Monitor Museum.

Janice Lauletta-Weinmann



[EXTERNAL] Opposition to Monitor Point Rezoning

From Jens Rasmussen [REDACTED]
Date Tue 5/19/2026 1:00 PM
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Lincoln,

Like you, I oppose the turning of city land into another high-density luxury housing complex for developer's profits.

As you well know, Over 29,000 new units built in our district, the most of any neighborhood in NYC for the last 14 years. This development will not lower rents but it will likely remove the LAST opportunity we have to create more (desperately needed) open space on our waterfront for the community.

I don't need to go down the list of other problems this development exacerbates: from flooding, traffic and other infrastructure demands.

Please vote no on Monitor Point.

Jens Rasmussen.

he/they
[REDACTED]



[EXTERNAL] Written Testimony in Opposition to Monitor Point Development

From Jeremy [REDACTED]
Date Fri 5/29/2026 9:16 AM
To Land Use Testimony <landusetestimony@council.nyc.gov>

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Chair and Members of the Subcommittee:

I'm Jeremy Gottfried, a longtime resident of Williamsburg. I oppose the Monitor Point development for multiple related reasons.

First, how can we trust Gotham's promises in the name of rezoning when rezoning promises have already been broken for 20 years? As a condition of the 2005 Greenpoint-Williamsburg rezoning, this community was promised a 27.3-acre waterfront park called Bushwick Inlet Park. The MTA promised to move its facility to make way for that park. Today, only 8.7 acres of the park have been completed. Now, similar public hearings and developer assurances are being used to persuade residents to accept another major development on this site instead of the city fulfilling the original promises. This subcommittee should reject the Monitor Point proposal and fulfill the existing promises first.

Second, the "no cost to the city" claim is misleading. The city spent hundreds of millions of dollars to buy the land for Bushwick Inlet. This is prime real estate. Developers claim this project costs taxpayers nothing, and that the project is only providing benefits like new housing and development of the park and museum. The real costs are just hidden: a 99-year lease of publicly owned land (which will most likely be renewed) with freedom to develop and profit, property tax exemptions, depreciation and business expense write-offs. That is hundreds of millions of dollars in public value transferred to private hands. The value of this land will increase and the market-rate rents will grow along with the developer's profits. In addition to that, our community will pay the cost of hundreds of new market-rate residents using our infrastructure, and the loss of precious parkland, the remaining of which will be closed in by the new buildings. Before any vote, the subcommittee should demand a full accounting of the tax strategy being used to finance this deal and Gotham's own profit projection.

Housing built on public land should be 100% affordable. If public subsidy and use of public land are what makes this project viable, then the public should benefit as fully as possible.. And given the city's track record of enforcement on this very site, whatever future benefits are being promised mean little. I urge this subcommittee to reject market-rate housing on public land, demand a full accounting of the cost to

the city and the developer's potential profit, complete Bushwick Inlet Park as promised, and ensure we are protected from environmental and infrastructure impacts before any approvals. Thank you.

Respectfully,
Jeremy Gottfried

[REDACTED]



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Jerry Mraz [REDACTED]**Date** Sun 5/24/2026 8:02 AM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hello Lincoln,

I realize this Monitor Point situation has you in between a rock and a hard place. I'm chiming in to urge you to vote No on this project for the myriad of reasons we both know too well. Mainly that if this project is built on public land it should be 100% affordable and the neighborhood is already awash in lux/rich people types. Thats all, I dont want to waste your time. I appreciate you fighting the good fight. Thanks

Jerry Mraz

2.5 blocks away for the last 23 years



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Joe T [REDACTED]**Date** Tue 5/26/2026 7:53 AM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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I am writing to voice my **STRONG** opposition for Monitor Point. This is a terrible deal that will only benefit a handful of investor new yorkers, and not benefit the city at large. These wet lands are important and need **NOT** to be developed in this way! Definitely not by paving over the wetlands and creating these huge buildings with very expensive rents.

thank you for listening,

Joe Therrien
Brooklyn NYC

Statement of John R. Greene in Support of the Monitor Point Application

To whom it may concern:

My name is John R. Greene. I was the Motiva Enterprises Real Estate Manager who handled the Donation of a certain parcel of land at Bushwick Inlet, Brooklyn, NY to the Greenpoint Monitor Museum, a non-profit corporation (Museum).

I understand there is an opportunity for the Museum to participate in the further development of the land surrounding the donated parcel, called Monitor Point.

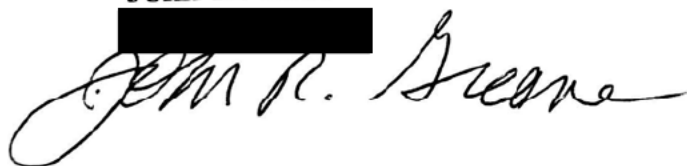
The use of the property was intended to be a Museum honoring the USS Monitor Civil War warship which was constructed and launched in the waters of Bushwick Inlet.

The Deed and Press Release, copies of which are attached to this statement, accurately contain the purpose of the Donation to the Museum. Any participation by the Museum in the proposed Monitor Point Development, including the sale by the Museum of any excess floor area, is considered to be within the letter and spirit of the Deed language and Press Release.

Should you have any questions or need additional information, please do not hesitate to contact me.

With kind regards,

John R. Greene

A handwritten signature in cursive script that reads "John R. Greene". The signature is written in black ink and is positioned below a black rectangular redaction box.

Attachments

John Gregor
Testimony in Support of Monitor Point
City Council Subcommittee on Zoning and Franchises Public Hearing
(May 27, 2026)

Dear Chair Louis, Councilmember Restler, and Members of the City Council Subcommittee on Zoning and Franchises,

I am writing to request your support for the Greenpoint Monitor Museum and the Monitor Point application. I have spent more than ten years working with the Museum, not only at meetings and events but also personally mowing and maintaining the historic site at 56 Quay Street.

My commitment to preserving the USS *Monitor* site is rooted in my great-great-grandfather's service in the Union Army. I have assisted with the Museum's programs, including its annual awards ceremony for students in its Road Show where I have seen how it helps young people understand and embrace the community's history.

This museum stands as a tribute to the ship that helped save the Union and advance the struggle to end slavery, preserving a history Greenpoint should be proud of and carry forward. It tells the story of Brooklynites of all backgrounds coming together for a common cause, a story that remains as vital today as ever.

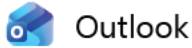
Today, we finally have the chance to give the Museum a permanent home on the very site where the *Monitor* was built. With the funding provided through the Monitor Point project, the Museum can construct its building, open its waterfront to the public, and restore the shoreline I have watched erode for years, allowing New Yorkers to experience the ground where the *Monitor* first entered the water.

That opportunity depends on the Monitor Point proposal. The Museum owns its land, but under current zoning it is located in an industrial district where museum use is not permitted, making rezoning essential. The residential portions of Monitor Point will fund the Museum's construction, its waterfront open space, and an endowment for future generations, while also delivering much needed, truly affordable housing for the city.

For America 250, this project offers a important connection to our shared history, honoring the past while helping build a more equitable future for all New Yorkers. I respectfully ask the Council to support the Museum by supporting Monitor Point.

Thank you for your time and consideration,

John Gregor



[EXTERNAL] Opposition to Monitor Point Rezoning

From joshua thompson [REDACTED]

Date Tue 5/26/2026 2:59 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council Member Restler,

I am very concerned that MTA is using the Monitor point project as a quick and easy way to get new facilities at the expense of Bushwick Inlet, a unique common natural resource. The construction process and the massive buildings proposed will damage this already battered inlet for centuries.

The maximum benefit of this exchange should be for the people of North Brooklyn, not the MTA or the developer. **Greenspace and affordable housing, which are our priorities, MUST BE the primary benefits of this project.**

The sight has value just as it is, which will be diminished by moving forward with the current proposal and with minimal gain for the community.

Opening up access to the waterfront could be done WITHOUT the massive development. MTA can move their facility WITHOUT a corporate handout.

Increase the benefits of greenspace and housing for this community and we can discuss another path forward.

Sincerely,
Joshua Thompson

[REDACTED] Brooklyn, NY 11222



[EXTERNAL] Opposition to Monitor Point Rezoning

From Justin Lucero [REDACTED]

Date Mon 5/25/2026 11:29 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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To: Council Member Lincoln Restler, Community Board #1 , Borough President Reynoso and the City Planning Commission

From: Justin Lucero, Brooklyn, NY 11222

Dear Council Member Restler,

I am writing to urge you, in the strongest yet most respectful terms, to vote **NO** on the proposed upzoning at Monitor Point in the upcoming City Council hearing on May 27.

My wife and I moved to Greenpoint in June 2022 after living next to the BQE. We didn't expect to fall in love with the neighborhood as deeply as we did, but almost immediately, we felt something rare: a genuine sense of community. As newcomers to New York City, finding a place that felt welcoming, human, and grounded was incredibly meaningful to us. Greenpoint became our home in every sense of the word.

After a year here, we adopted our dog, something we felt confident doing because of the neighborhood itself. The walkability, the access to small but cherished parks, such as Transmitter Park and McCarren Park, and the peacefulness of the waterfront made it possible to build a life that felt balanced and joyful. Evenings spent watching the sunset along the water, surrounded by neighbors doing the same, are some of our most valued memories in this city.

Because of that love for the neighborhood, we chose to renew our lease for another two years, but that decision has come with growing concern. In just four years, we have watched the waterfront, and the character of Greenpoint, change at an alarming pace. Large-scale developments have risen rapidly, and with them, many of the small businesses and local institutions that once defined the neighborhood have disappeared, often with little notice or consideration. During this time, we've seen the construction of The Greenpoint, West Wharf, The Riverie, and many other projects, alongside the devastating news that the historic Greenpoint Terminal, right next to Transmitter Park, has been sold to make way for yet another luxury development. Living right next to these changes has also had a direct impact on us: constant drilling, construction sites, and trucks passing by at 4 a.m., both during the week and on weekends, have significantly affected our quality of life and, at times, our mental health.

There is a growing feeling among residents that Greenpoint's waterfront is being reshaped into something unrecognizable: another waterfront defined by luxury buildings rather than by people, culture, and community (similar to what happened to the waterfront area in Long Island City). Friends who visit often say the same thing: they love Greenpoint, but they worry about what it is becoming and prefer to live elsewhere in neighborhoods in Brooklyn that still preserve their character.

And yet, there is still something here worth protecting.

Bushwick Inlet is one of those places. In the short time since it has reopened after decades of being closed off, it has become a truly special space, a place where nature and community meet. On any given day, you can see neighbors gathering, bird watchers observing wildlife, and families enjoying a rare stretch of open, natural shoreline in New York City. It feels alive, and it feels shared.

That is why it is so deeply troubling that, at this moment in history, we are being asked to accept a proposal that would once again prioritize private luxury development over a public, ecological, and community resource.

In just the past four years alone, over 2,200 residential units have already been built nearby, with thousands more planned. This is not a neighborhood that has resisted growth—it is a neighborhood that has absorbed it, rapidly and repeatedly. But growth without balance has consequences. Rents rise, long-time residents are pushed out, and a sense of place begins to erode.

The proposal to upzone 40 and 56 Quay Street raises serious concerns that go beyond any single building:

- It disregards the intent of the 2005 rezoning plan, which promised this area would serve as a transition zone, not a corridor of high-rise towers.
- It sets a troubling precedent by removing protections from land that should remain for public use.
- It risks undermining Bushwick Inlet at the very moment the surrounding park is finally being realized after decades of advocacy and delay.
- It prioritizes predominantly luxury housing, which has consistently failed to address affordability for communities like ours.
- It puts a rare and fragile ecological habitat at risk, one that cannot simply be recreated once lost.
- It adds significant density to an already overbuilt area without the infrastructure needed to support it.
- It places additional development in a coastal flood zone, raising serious concerns about long-term resilience in the face of climate change.

This is not just a planning decision, it is a defining choice about what kind of city we are building, and for whom.

Public land is a public trust. It should serve the needs of the broader community, not be converted into a private amenity for a small number of luxury residents. To move forward with this proposal would feel like a betrayal of both the commitments made in the past and the people who continue to invest their lives in this neighborhood.


There is a different path forward, one that reflects both vision and responsibility. Preserving Bushwick Inlet as a nature-based, resilient public space would protect the shoreline, support biodiversity, and provide lasting value to the entire community. Green space in a city like NY is much needed! It would honor the original intent of the area and demonstrate that development in New York can still be thoughtful, balanced, and rooted in the public good.

Greenpoint has given us something we never expected to find in a city this large: a sense of belonging. That is not something that can be easily rebuilt once lost.

I urge you to stand with your constituents, uphold the promises made to this community, and continue protecting one of our few remaining natural spaces. Luxury development cannot be the only path forward, this is an opportunity to pursue a nature-based, resilient solution for this site that truly serves the public good. In a city like New York, accessible green space is not a luxury; it is an essential part of a healthy, livable community.

Thank you for your leadership and for your consideration.

Sincerely,
Justin Lucero

 IMG_2870.HEIC

Statement of Karen Olszewski in Support of Monitor Point

ULURP Numbers: C260105ZMK, N260106ZRK, C260107ZSK, N260108ZCK, 260110LDK, C260109ZSK, and C250326MMK

New York City Council Public Hearing (May 27, 2026)

Dear Councilmembers,

My name is Karen Olszewski. I write to you as the treasurer of the Greenpoint Monitor Museum and a lifelong Greenpointer in support of Monitor Point. My husband and I have raised 3 children here and 2 are still living in Greenpoint. We attended the local schools as well as our children and now our granddaughters. My family has lived here for over 150 years.

As the Museum's treasurer, I would like to give the City Council some insight into the history of its finances. The Museum has operated on a very limited budget because for over two decades, since Motiva donated the Museum's land, the Museum has been focused on first defending and then rezoning that land. Monitor Point will be the culmination of over two decades of work and will provide the Museum with the resources that it needs to succeed.

The Museum received its land in December 2003. Just a few months later, in May 2004, the Museum learned that New York City was considering acquiring the Museum's land by eminent domain. This significantly hindered the Museum's ability to grow because much of its energy was directed towards the threat of having its land condemned. We could not effectively fundraise for a permanent home when we did not know if the Museum would have land to build that home on.

At the end of 2015, the city government announced that it had decided that it would not condemn the Museum's land. The Museum could finally start planning for a stable future. At the beginning of 2018, we engaged pro bono council and started having conversations with the Department of City Planning about rezoning the Museum's property to allow museum use. Then in the spring of 2019, everything changed again when the MTA issued its RFP for 40 Quay Street. The Museum recognized the incredible opportunity that this RFP represented, so it began conversations with potential developers, which led to extensive negotiations with Gotham and finally the Monitor Point proposal.

Therefore, since the Museum received its land in late 2003, it spent 2004-2015 fighting the possibility of eminent domain and 2018-2026 working on the rezoning (with 2019-2026 focused on the Monitor Point project). In the face of so much uncertainty, the Museum has needed to make sure that it can keep and use its land before it can seek the support of major donors.

If Monitor Point is approved, the Museum's deal with Gotham will transform its finances. This transaction will give the Museum the funds it needs to construct its building, to stabilize and open its shoreline, and to create an endowment for its operations. The Museum's leadership is working to responsibly steward the resources from this once-in-a-lifetime opportunity. For example, the Museum is currently working with FX Collaborative Architects to design a smaller

building (approximately 17,000 square feet) to ensure that it will have funding for a sufficient endowment after construction is complete.

On a more personal note, as treasurer it has been my pleasure to assist with the Road Show Awards ceremonies as well as concerts and other Museum celebrations. As the organist and soloist of a local Episcopal church I was able to connect the parish's history to the USS Monitor. The owner of the shipyard where the Monitor was built was the benefactor that built the church. These connections to the greater community only support the idea that the history of the USS Monitor must be preserved for future generations.

As a retired NYC teacher, I know that the creation of the museum will offer not only neighborhood students the experience of learning about the history of their community but also invite students from throughout the city to visit.

I believe that the community would benefit from this project in many ways. It would provide affordable housing, more open space, and a museum that highlights the important history of Greenpoint. There is no other museum in the area. Students would be able to walk to the site to enjoy the hands-on experiences that the Museum will provide. The open space area would offer opportunities for outdoor community events related to the Museum. I teach music part-time at a local public school. In my lessons, I incorporate some history about the musical selections they are learning. My students get very excited when I start the historical lessons. Most times they ask me to continue the discussions for the next few weeks. We owe it to them that we create a space where they can learn these lessons as they reflect the exciting history of Greenpoint.

Many of the families that I come in contact at the school are looking for more affordable housing and would embrace the idea of having more open space by the waterfront as part of the project. This project is a win-win for the Greenpoint community. All parties would benefit. Without this project nothing will change – no additional affordable housing, no museum and no added open space. No one is losing anything by approving this proposal.

I understand that certain people have raised concerns about whether the Museum can succeed. I ask the City Council to recognize that Monitor Point is the result of over 30 years of the Museum's hard work. If this proposal is approved, it will give the Museum what it needs to thrive.

Thank you,
Karen Olszewski

Katherine Conkling Thompson

Dear Councilmember Restler and Members of the City Council,

My name is Katherine Thompson, and I am a volunteer with Save the Inlet, a grassroots coalition working to protect Bushwick Inlet Park and ensure that public land serves the public good.

More than 5,000 residents have signed our petition opposing the Monitor Point proposal, and hundreds have submitted testimony throughout the three public hearings held during this ULURP process. That extraordinary level of engagement reflects how deeply this community cares about the future of Bushwick Inlet and the rare tidal embayment at its heart.

I have lived in Greenpoint since 1996, raised three children here, and spent decades volunteering in this community. In 1999, my husband, Dewey, and I founded the Greenpoint/Williamsburg Youth Soccer League, AYSO 1328, an all-volunteer organization built around a simple motto: "Everyone Plays." For twelve years, while working full-time jobs and raising our family, we signed up children and families from Greenpoint to the Southside of Williamsburg and grew the league from fewer than 100 players to more than 1,000. We did it because we believed in bringing people together and building community across neighborhoods, backgrounds, and income levels.

That is why I find it particularly painful that the Monitor Point proposal has divided neighbors and pitted members of the community against one another. Throughout this process, residents raising legitimate concerns about flood risk, climate resilience, environmental impacts, and the future of publicly owned land have too often been dismissed as NIMBYs or accused of opposing diversity and affordable housing. Nothing could be further from the truth. Over the last thirty years, I have watched Greenpoint welcome tremendous growth. Our neighborhood has added both market-rate and affordable housing and become more diverse in the process. I celebrate that change. What I oppose is placing dense residential development on publicly owned waterfront land in a FEMA-designated Special Flood Hazard Area and on historic wetlands at the edge of a waterfront park that generations of residents fought to create.

During this ULURP process, I have been astounded by the disregard shown for climate science and for the recommendations of city, state, and federal agencies. At a time when New York is grappling with sea-level rise, extreme weather, and the need for climate adaptation, this proposal moves in the opposite direction. That is particularly troubling because we are talking about publicly owned property, where the City has the opportunity—and responsibility—to lead by example.

I would like to focus my comments on Gotham Organization's claim that this proposal is consistent with the Waterfront Revitalization Program:

Under Policy 1, development should be appropriate to its setting and provide a clear public benefit. Yet the project dramatically increases density and building scale while citing public benefits—waterfront access, connections, and an esplanade—that are already required under existing zoning. At the same time, the proposal seeks to reduce the waterfront access area from 40 feet to 30 feet. What meaningful new public benefit is actually being provided? Under Policy 1.3, the Draft Environmental Impact Statement concludes there will be no significant open-space impacts. Yet approximately 3,000 new residents would be added without meaningful new parkland in a neighborhood that already falls below city open-space standards. This will place additional strain on Bushwick Inlet Park and further reduce open space per capita.

Under Policy 4, Bushwick Inlet is a recognized ecological resource. Yet the proposal relies primarily on a hardened steel bulkhead and extensive hardscape. These measures do little to restore ecological function, improve tidal habitat, or strengthen natural resilience. Nature-based alternatives, including wetland restoration, do not appear to have been fully evaluated.

Under Policies 4.5 and 4.7, the site's location adjacent to tidal wetlands, combined with its history as landfill and a brownfield, raises serious concerns. Excavation across 1.8 acres at the water table could disturb contaminated soils and affect the surrounding inlet ecosystem. These risks warrant far greater scrutiny.

Under Policy 5, concerns also remain regarding groundwater and historic hydrology. This site occupies former wetlands connected to the historic Bushwick Creek system, which continues to influence flooding patterns today. Constructing a large, hardened podium over much of the site appears inconsistent with goals of managing water naturally and protecting water quality.

Under Policy 6, the City calls for minimizing risks associated with flooding and sea-level rise. This proposal places thousands of residents in a flood-prone waterfront location. While portions of the project are elevated, the long-term implications of accelerating sea-level rise and increasingly severe storm events remain uncertain.

Under Policy 8, publicly owned waterfront land in a park-starved neighborhood should be prioritized for open space whenever possible. This site represents one of the last opportunities to expand Bushwick Inlet Park and fulfill the long-standing public commitment made to this community. Instead, the proposal increases building density while narrowing the public waterfront.

Under Policy 9, development should respect neighborhood context and visual character. Replacing a low-scale waterfront site with a massive podium and towers rising up to 56 stories will fundamentally alter the experience of the park, affecting light, air, views, and the human scale of the waterfront.

Finally, I wish to draw your attention to the DEIS Save the Inlet comments regarding the insufficient WIND analysis which is required:

Wind Impacts on Migratory Birds & Public Open Space

Save the Inlet doesn't think that the Pedestrian-Level Wind (PLW) Study included in Appendix D of the Monitor Point dEIS sufficiently evaluates wind impacts on both migratory birds and passive recreation conditions at Bushwick Inlet Park, a recognized ecological complex and critical public open space resource.

The report concludes that wind conditions are "acceptable" because they do not exceed a 56 mph gust threshold. According to The [National Weather Service](#), official Beaufort Wind Scale, 39-46 mph are "Gale" force winds. Winds at 56 mph are registered as level "Storm- trees uprooted; considerable structural damage occurs." This seems like an inappropriately high bar that ignores widely accepted thresholds for comfort, usability, and everyday safety in an urban environment.

In New York City, winds in the range of [40 to 50 mph are already considered dangerous](#), creating walking difficulties, increasing the risk of falling debris, and making streets and open spaces hazardous. The National Weather Service issues High Wind Warnings when sustained winds reach 40 mph, and pedestrian balance is known to be significantly affected at gusts around 55 mph. It is notable that the dEIS Wind Study itself predicts conditions approaching approximately 39 mph, with multiple locations reaching into the mid-40 mph range. These are not trivial conditions—they are borderline dangerous for pedestrians and widely recognized as uncomfortable and unsuitable for passive recreation.

This is especially concerning given the site's immediate adjacency to Bushwick Inlet Park, which is intended to serve as a place for sitting, relaxing, waterfront viewing, children's play, and informal gathering. CEQR requires evaluation of whether a project would diminish the usability of public open space. Winds in the 30 to 45 mph range on are well known to discourage sitting and lingering, create harsh and unpleasant conditions along waterfronts, and will reduce the overall accessibility and enjoyment of Bushwick Inlet Park. Save the Inlet believes that the dEIS does not meaningfully evaluate these comfort and usability thresholds and deserves more scrutiny.

The Wind Study does not include consideration of impacts on migratory and habitating birds in the inlet. Save the Inlet thinks this is a severe oversight and study of wind impacts on birds and ecology should be studied. Winds in the range of 25 to 30 mph are known to begin stressing birds and disrupting migration, while gusts of 35 to 40 mph or higher can force landings, displace birds from flight paths, and impair navigation ([NYC Bird Alliance](#)). The project, however, is predicted to generate wind conditions at approximately 39 mph sustained winds

with gusts in the mid-40 mph range—levels that exceed thresholds known to disrupt bird behavior.

The Bushwick Inlet is a recognized migratory corridor in Eastern Long Island and a designated ecological complex identified in the Waterfront Revitalization Program. Bushwick Inlet functions as a critical stopover and navigation point, where birds depend on relatively calm conditions to land, rest, and feed. The dEIS Wind Study should study the impact from the bird's point of view where the construction of three high-rise towers—21, 41, and 56 stories—directly adjacent to this habitat which could generate downwash, wind acceleration, and turbulent shear zones that can increase energy expenditure, cause disorientation, and lead to migration “fallout” events where birds are forced to land in suboptimal and hazardous urban environments. These impacts should be analyzed in the dEIS.

The wind study does not thoroughly look at cumulative neighborhood conditions because it does not include all anticipated as-of-right development along West Street extending north toward Greenpoint Avenue. The combined impact of the proposed Monitor Point towers, existing high-rise development, and likely future buildout could result in a continuous corridor of elevated wind conditions along West Street and into Bushwick Inlet Park. Without modeling this reasonably foreseeable full build-out scenario, Save the Inlet does not believe that the dEIS Wind Study meets CEQR requirements and should be expanded to include all of West St. Save the Inlet questions why the Wind Study only models conditions at approximately five feet above grade, which doesn't take into account bird flight behavior. The model explicitly excludes vegetation and landscape features which seems peculiar as we know is affected by wind. The study also excludes extreme weather events such as Hurricanes and Super Storms, despite increasing climate volatility, and does not integrate its findings with ecological or open space impact analyses. Last [July 2025, NYC experienced several very damaging “storms”](#) which brought gusty winds of 50-65 mph to the NYC area, resulting in downed trees and power line damage, and massive flooding. It seems at the very least, the wind study should include what are now fairly common weather events.

The study concludes that wind conditions are “safe,” yet it acknowledges wind speeds are in the official Gale force range of approximately 39 to 45 mph. These everyday conditions are near-dangerous for pedestrians, uncomfortable and disruptive for park use, and well above thresholds known to harm birds. And all of this is occurring within a public waterfront park that also functions as a recognized ecological complex supporting bird habitat and vegetation. Save the Inlet believes that the conclusion of no significant adverse impact should be questioned by the commission and to meet CEQR standards, a revised analysis should be required that includes pedestrian comfort criteria, full build-out of cumulative wind modeling, and multi-level wind analysis extending through the vertical range of bird flight. Given that the Bushwick Inlet is a Recognized Ecological Complex in the Waterfront Revitalization Plan, Save the Inlet wonders if the Wind Study model should include a formal ecological assessment of migratory pathways and habitat use at Bushwick Inlet, include vegetation and landscape features to reflect actual conditions, and evaluate extreme weather scenarios, including storm-driven and climate-adjusted wind patterns.

After nearly thirty years in this community, I know that Greenpoint and Williamsburg can grow, welcome new neighbors, and build affordable housing without sacrificing our environmental future or giving away precious public waterfront land. We should not be forced to choose between housing and resilience, between affordability and open space, or between today's needs and tomorrow's realities.

Councilmember Restler, I respectfully urge you to vote NO on the Monitor Point rezoning. This publicly owned site represents a once-in-a-generation opportunity to expand Bushwick Inlet Park, strengthen climate resilience, and honor the promises that were made to this community. Once these towers are built, that opportunity is gone forever.

Thank you for your consideration,

Katherine



[EXTERNAL] Opposition to Monitor Point Rezoning

From Kathy Uggen Merget [REDACTED]

Date Tue 5/26/2026 8:44 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Lincoln Restler, I would like to voice my opposition to the Monitor Point re-zoning that would allow for the towers to be build on designated park land. Many neighbors and activists have expressed their opinion, and I agree with their opposition. I have raised my children in Greenpoint, Brooklyn, and can affirm that there is not enough park space for the constantly increasing density of Greenpoint. The parks are already over crowded, over-used, and do not have adequate space for the rising population here. The quality of urban family life is tethered to access to local park space. To increase housing on top of designated park space just doesn't make any sense. Yes, we need more affordable housing, but it should not be placed on this site. I am certain there are multiple sites that could be used that do not have the unique environmental footprint of the Bushwick Inlet. Please support the families that live here and honor the agreement made in 2005. Stop the re-zoning of Monitor Point.

Thank you,
Kathryn Uggen-Merget
Greenpoint resident



[EXTERNAL] Monitor Point

From Kyle Woods [REDACTED]

Date Fri 5/29/2026 3:32 PM

To Land Use Testimony <landusetestimony@council.nyc.gov>; District33 <District33@council.nyc.gov>

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To whom it may concern,

The proposed rezoning of the Monitor Point parcel at 40 Quay Street represents a serious threat to the quality of life for existing Greenpoint and North Williamsburg residents as proposed, and should be rejected. Brooklyn Community District 1 already ranks near the bottom of all city districts in open space per capita, with just 0.6 acres per 1,000 residents — less than a third of the citywide average of 1.8 acres and far below the city's own goal of 2.5 acres. This project would add nearly 3,000 new residents while contributing only a narrow waterfront esplanade and a required street extension as public open space — amenities that don't begin to offset the density being added. Worse, the proposal requires removing park designations from adjoining public land to accommodate the towers, effectively shrinking the very parkland that a community starved of green space has waited two decades to see completed. Bushwick Inlet Park, finally nearing completion after 20 years of community advocacy, would be turned into a private amenity for luxury tower residents rather than the public resource it was always meant to be.

The infrastructure consequences of this rezoning are equally alarming. The Greenpoint waterfront has already absorbed thousands of new residents from development permitted under the 2005 rezoning, with nearly 5,800 new housing units added on the waterfront alone and thousands more planned. The combined sewer system serving this area already discharges an average of 164 million gallons of overflow per year into Bushwick Inlet before a single additional toilet is added. The neighborhood's sewer pipes, subway lines, and stormwater systems have not kept pace with growth that has already occurred — and this project offers no meaningful infrastructure upgrades to support the density it would create. The site sits in Evacuation Zone 1, on landfilled historic wetland, in an area where storm surge reached 12 feet during Hurricane Sandy. Adding 1,150 luxury apartments to this location, without a serious plan for the sewer, flooding, and stormwater consequences, is not responsible urban planning — it is reckless development that would leave the broader community to absorb the costs.

Finally, the process itself reveals where the developer's priorities truly lie. The Gotham Organization has invested heavily in lobbying, public relations, and a sustained promotional campaign for this project — resources that could instead have been directed toward meaningful community benefits like deeply affordable housing, infrastructure improvements, or genuine ecological restoration. The application proposes only 25% affordable units, while community members attending public meetings

were repeatedly led to believe the figure was 40% — a discrepancy that speaks to a pattern of misleading public engagement. The 2005 rezoning explicitly envisioned this land as a low-rise transition zone and buffer, not as the site for the tallest tower in North Brooklyn. Granting this upzoning would hand the developer an enormous increase in land value at public expense, in exchange for benefits the community has clearly said it does not want. Public land at the water's edge in a flood-vulnerable, park-starved neighborhood deserves a better future than luxury towers — one that prioritizes resilience, ecology, and the public good. A developer can already build housing on the site, just at a smaller scale that wouldn't squeeze additional profit out of the community at the expense of addition community value. As pointed out by Council member Restler, the inclusion of Box Street park, a separately promised park held hostage by the MTA for over a decade, is insulting to the residents of the neighborhood as it is unrelated and should not depend on investors profiting off of the community to be completed.

I urge you to reject the rezoning proposals at the Monitor Point site.

Best,
Kyle Woods
Greenpoint Resident



[EXTERNAL] Opposition to Monitor Point Rezoning

From Lauren Roth [REDACTED]

Date Tue 5/26/2026 1:08 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hi,

As a 4+ year resident of Greenpoint/Williamsburg, I am writing to share I oppose monitor point.

We as city dwellers need more green and recreational spaces open to the public and more buildings being built will reduce that for residents.

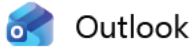
Please no more luxury high rises, keep the land to share with local residents.

Lauren

--

Lauren Roth

[Calendly](#)



[EXTERNAL] Opposition to Monitor Point Rezoning

From Lili Jackson [REDACTED]

Date Tue 5/26/2026 3:00 PM

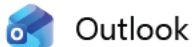
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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- 1) This is public land
- 2) The MTA will make \$0 from this, only developer benefits
- 3) The shadow this will cast will put Brooklyn in near perpetual shadow
- 4) Every time it rains that much more faeces (2,000 more lbs per rainy day) will end up in the creek and river
- 5) The environmental hazard to the fragile and special ecosystem of BIP
- 6) Luxury condo's drive up prices vs keeping rents low. Obvious statistic.
- 7) There are 7 figures of vacant housing. Fix that first!

Thank you,

LiLi Jackson



[EXTERNAL] Opposition to Monitor Point Rezoning

From Lisa Goren [REDACTED]

Date Wed 5/27/2026 11:17 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hello - I am a resident of Long Island City, and I wish to register my strong opposition to the Monitor Point rezoning plan in Greenpoint, for these reasons:

- New York City's public waterfront properties are a shared resource needed for the public good-- primarily as open parkland, recreational space, and expanded waterfront access. They do not belong to private developers.
- The public waterfront property at Monitor Point is situated in a vulnerable floodplain. There is simply NO good reason for placing housing there, given what we know about rising sea levels and more frequent and dangerous storms. And it will soon be uninsurable.
- Public waterfront properties in the floodplain, like those by Bushwick Inlet, are essential as open parkland that allows water to flow in and back out. They are needed to support multi-pronged, robust resiliency infrastructure that protects the neighborhoods stretching behind. An esplanade with patches of open space is not resilient.
- These particular public waterfront properties include rare habitat and were meant as an extension of Bushwick Inlet Park. They are a natural treasure that should be available to everyone -- not a handout to a private developer.
- Over 29,000 new housing units have been built in Greenpoint over the past decade and a half, and the neighborhood is now one of the lowest in per capita open space. It needs more parkland--not new housing.

Please do the right thing for Greenpoint and for the city, and use these properties as they were intended, as much needed acreage for Bushwick Inlet Park.

Thank you,
Lisa Goren

Fewer Players, Fewer Homes: Concentration and the New Dynamics of Housing Supply*

Luis Quintero

Carey Business School, Johns Hopkins University

August 30, 2023

Abstract

Local homebuilding markets have become highly concentrated in the past decade. We document this increase in concentration and use IV regressions to show that it has led to lower production volume, fewer units in the production pipeline, and greater unit price volatility. These results are consistent with a theoretical model in which oligopolistic firms strategically set the timing, volume, and price of their new construction. Our estimates imply that market concentration has decreased the annual value of housing production nationwide by \$106 billion. These findings provide further evidence that the secular decline in competitive intensity is altering macroeconomic dynamics

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1 Introduction

Local housing production markets have become highly concentrated. Because the supply of new housing is integral to the growth of cities as well as households' consumption and investment decisions, changes to the market structure in this industry have significant impacts on the broader economy. In this study we identify the decline in competitive intensity in local housing construction markets and demonstrate its impact on the price and supply of new housing.

We use a detailed novel dataset that connects highly disaggregated data on new housing supply with individual developers and joint ventures on 137 local housing markets. We construct an instrumental variable that exploits regional shocks that are exogenous to local markets. These shocks get transmitted locally through the local activity of large national firms. We use this variation to show that the secular decline in competitive intensity over the last decade has caused reduced construction volumes, a decline in the inventory of vacant unsold housing units, and greater price volatility. These findings align with theoretical models of competition and preemption in real estate ([Grenadier, 1996, 2000](#)) and are consistent with practitioners' understanding of industry dynamics. We present a theoretical model of housing construction under oligopoly that motivates our empirical investigation.

To understand the economic magnitude of these results, we use our parameter estimates to investigate a counterfactual scenario where housing market competition remains at its high pre-recession level across the United States. Under this counterfactual, market outcomes would be very different. The annual volume of new housing would be \$106 billion higher (equivalent to 3.4% of private fixed investment or 0.6% of gross domestic product). Approximately 150,000 additional housing units would be built each year. Housing price volatility would decline by over 50%.

Indeed, in recent years the supply of new housing has been limited even as the economy has recovered from the Great Recession ([JCH, 2022](#)). As of 2022, the number of new housing units is 60% lower than its monthly peak in 2006m and still lags even the 1990–2002 average by 20% despite years of strong economic growth and rising house prices ([US Census Bureau, 2022](#)). This limits the ability of workers to move to employment ([Hsieh and Moretti, 2015](#); [Ganong and Shoag, 2017](#); [Bunten, 2017](#)), strains the budget of low-income renters ([Albouy et al., 2016](#)), and creates unequal distributions of housing wealth ([Glaeser and Gyourko, 2018](#)). Accordingly, understanding the determinants of low supply of new housing is essential to ensuring the future health of cities. Other studies have explored potential supply restrictions including regulatory barriers (as reviewed in [Gyourko and Molloy \(2015\)](#)) and scarcity of buildable land ([Saiz, 2010](#)). Some homebuilders have also complained of a skilled

labour shortage (Goodman, 2018). Our study contributes to this literature by identifying an additional channel — specifically, the rising market concentration in homebuilding.

We contribute to the limited strand of literature that explores market power specifically in the housing sector. Somerville (1999) finds a positive cross-sectional correlation between concentration and market outcomes for large MSAs. In the absence of supply measures by builder, they document concentration by proxying development size with builder employment size. Our study contributes to the literature by documenting the confluence of circumstances in the past decade which have generated the high degree of concentration in local housing markets and by using a novel panel of detailed housing microdata to measure the causal effect of rising concentration. A recent important paper (Kroft et al., 2020) documents imperfect competition in housing by looking at both price markups and wage markdowns from operations of developers in all the markets they are present in.¹ Their analysis includes revenues from business operations, excluding non-business-operation revenues such as dividends and capital gains. We see this work as complementary to ours. We only focus on construction activity by looking at construction outcomes, and approach market power from a definition of local markets. In our variable measurement and identification of a causal effect we consider that developers may have market power in some local markets and not in others. Their analysis covers 12 percent of national sales, while we use nearly 100% of developments of in the markets we cover.

Additionally, our study contributes to an emerging literature on the decline in competitive intensity across a range of industries from 1980 through the present day² (Autor et al., 2017; De Loecker and Eeckhout, 2017; Galston and Hendrickson, 2018). Previous studies connected this secular decline in competition to higher markups (De Loecker and Eeckhout, 2017), increased wage-setting power in local labour markets (Azar et al., 2017; Benmelech et al., 2018), and lower aggregate investment (Gutiérrez and Philippon, 2017). Given the integral role of housing in household consumption and investment decisions, the decline in competitive intensity in the homebuilding sector has similarly profound consequences for the broader economy.

The impacts on the production of new housing we find have significant implications for the broader economy. Housing consumption accounts for 16% of total personal consumption

¹Identification uses participation in government procurement projects, an important business line for some large builders.

²Autor et al. (2017) attribute much of the increase in concentration to the dominance of “superstar” firms with high profits and a low labour share (Autor et al., 2017). This explanation seems less applicable in the context of the homebuilding industry which has experienced few productivity innovations (McKinsey Global Institute, 2017). Recent work shows that in a large number of industries, there is no evidence that growth in market power is accompanied by increases in operational efficiency (Grullon et al., 2019). We discuss circumstances that have contributed to the market concentration in homebuilding in Section 2.

expenditures and 11% of GDP ([Bureau of Economic Analysis, 2017b](#)) and primary residential mortgages account for two-thirds of all household debt ([Board of Governors of the Federal Reserve System, 2017](#)). Housing is central to households' consumption and investment decisions ([Hurst and Stafford, 2004](#)). Furthermore, the housing market cycle is an important component of macroeconomic cycles and in particular the transmission of financial shocks to the real economy ([Guerrieri and Uhlig, 2016](#)). [Leamer \(2007\)](#) finds that housing market cycles are typically driven by fluctuations in the *volume* of production rather than fluctuations in *prices* — that is, new construction is an important margin of adjustment for housing market dynamics³.

2 Market conditions

Housing production exhibits high concentration in local markets⁴. For instance, between 2005 and 2016, Baker Residential accounted for 37% of all new housing units in Bayonne, NJ, while Technical Olympic built 47% of all new housing units in Centreville, VA. Moreover, concentration has risen over the past decade. During the period of 2005-2007, The Craftmark Group accounted for 3% of new units in Annapolis, MD, whereas between 2014 and 2016, their share increased to 43%. Similarly, Baker Residential did not build any units in Middletown, NY from 2005 to 2007, but they built 37% of units between 2014 and 2016.

Figure 1 illustrates the high concentration in the local housing markets in our sample. During the period analyzed, the share of production by the largest firms in each market increased and the number of firms producing 90% of new units decreased. By 2016, the most concentrated quartile of markets saw two or fewer firms accounting for at least 90% of new housing production. The 100 largest home builders in the US now account for about half of all new single-family home sales, up from just over a third two decades ago ([Ahluwalia et al., 2022](#)), with most of these gains coming from increases in the shares of two homebuilders, D.R. Horton and Lennar.⁵

Figure 2 compares the distribution of Herfindahl indices across markets in the sample in 2006 and in 2015, our study period. The United States Department of Justice and the Federal Trade Commission deem any market with a Herfindahl index between 1500 and 2500 to be “moderately concentrated” and a Herfindahl index in excess of 2500 to be “highly concentrated” ([U.S. Department of Justice and Federal Trade Commission, 2010](#)). As shown,

³[Leamer \(2015\)](#) attributes the distinctive dynamics of the most recent housing market cycle to the specific confluence of monetary policy and mortgage securitization at the time.

⁴Our data set includes information on housing production and market concentration in the northeast United States between 2005 and 2016. We describe the data set in detail in Section 3.2.1. We define local housing markets in Section 3.1.

⁵these two currently build more than the rest of firms in the top ten

the entire distribution of Herfindahl indices has shifted towards higher concentration during this period. By 2015 60% of markets surpassed the “highly concentrated” threshold. [Martín and Whitlow \(2012\)](#) note that this rising concentration is a new phenomenon from the 2000s onwards.

Three changes to the national environment have contributed to the increase in market concentration over this period.

First, besides the failure of large corporations that managed properties or invested in real estate indirectly⁶, many homebuilding firms filed for bankruptcy in 2008 in the wake of the housing market downturn ([Thompson, 2009](#)). Highly active firms in our sample which filed for bankruptcy include Caruso Homes ([Merle, 2008](#)), Woodside Homes ([Beebe, 2012](#)), WCI Communities ([Kessler, 2008](#)), and Gemcraft ([Mirabella, 2009](#)). According to the Economic Census, the number of establishments in the larger residential construction sector, including contractors and renovations, fell by 25% between 2007 and 2012, while the number of residential developers fell by 55% in the same period (see [Figure 3](#)). Despite a strong price recovery since 2011, the number of builders has continued to fall, recording a decline of 65% from 2007. Since the Great Recession, the strong exit of firms seems to have implied a structural change in the market structure that did not simply bounce back with the cycle.

Second, several mergers have changed the outlook of the market structure in recent years, especially those between the largest national homebuilders. Pulte Homes and Centex merged in 2009 to create (at the time) the largest homebuilding firm in the country ([Clifford, 2009](#)), a title that was overtaken by Lennar and CalAtlantic when they merged in 2018. Other important mergers have been Tri Pointe and Weyerhaeuser in 2013 ([Sorkin, 2013](#)), and Standard Pacific and Ryland merged to form CalAtlantic in 2015 ([Hudson, 2015](#)). Large national firms have also purchased many regional firms ([Keene Advisors, 2016](#))⁷.

Third, a federal legislative stimulus measure late in 2009 increased the ability of homebuilders to use previous years’ losses to reduce their tax payments. The measure delivered \$2.4 billion in tax refunds in 2009 ([Corkery and Drucker, 2009](#)). Research has found a substantial effect on liquidity to a large homebuilder ([Graham and Kim, 2009](#)) and media reports indicated that the change was highly beneficial to the largest national firms ([Corkery and Drucker, 2009](#); [Barr, 2010](#)).

⁶49 real estate companies filed for bankruptcy in 2009 among those with \$50m or more in liabilities, the largest number ever recorded for the sector.

⁷Consolidation has continued after the end of our sample in 2016. Lennar purchased WCI Communities in 2017 ([Lane, 2017b](#)) and then merged with CalAtlantic ([Bray and Goldstein, 2017](#)) to form the largest homebuilding firm in the country ([Builder Magazine M&A, 2017](#); [Gara, 2017](#)), as mentioned. In the same year DR Horton purchased Forestar Group ([Lane, 2017a](#)). *Builder* magazine described 2017 as “a mergers and acquisitions juggernaut for home building” ([Bousquin, 2017](#)).

Together, these changes to the competitive environment have favoured the largest firms and contributed to the increase in concentration depicted in Figure 1. These changes have transformed the competitive environment in new housing production. For example, Elliott Building Group is active in several markets in Pennsylvania and New Jersey in 2005 and 2006 but following bankruptcy in 2007 (Crocker, 2007) it is no longer present in the sample. Conversely, Pulte Homes significantly increased its construction activity following the introduction of federal stimulus to assume a dominant market share in many Washington DC suburbs and other communities.

Homebuilding firms and other industry participants recognize the advantages of being dominant in a concentrated local market. In a Wall Street Journal article titled “Fewer Home Builders Means Happier Home Builders”, Lahart (2017) reports that builders reported being more optimistic about their future success following a reduction in local competitive intensity. When Lennar and CalAtlantic merged in early 2018, an analyst assessing the benefits of the merger noted that the combined firm would “dominate the housing market” in areas where both firms were active⁸ (Builder Magazine M&A, 2017).

In addition to these strategic considerations, larger homebuilding firms benefit from production advantages relative to smaller firms. O’Hollaren (2017) enumerates advantages including economies of scale, the ability to handle in-house design and development, the potential for joint ventures with government and industry, brand name recognition, and consumer financing packages. Large firms benefit from bulk purchases that lower the cost of materials, superior access to capital markets, and land inventories that allow for less costly production of new housing (Martín and Whitlow, 2012; Lahart, 2018). After mergers large national firms have reorganized their production to reflect these advantages (Khoury, 2015; Lane, 2017a). Porter (2003) suggests that larger firms’ access to more patient capital through corporate bond markets and greater staff capabilities makes them better equipped to navigate and influence local land use regulation (Ouasbaa et al., 2022). According to Metcalf (2018), the complexity of local land use regulations constitutes a substantial fixed cost to homebuilders as well as a barrier to entry.

Financial markets provide evidence for the success of large national firms in recent years. From 2010 through 2017, the largest exchange-traded fund based on homebuilder stocks (Google Finance API, 2018a) experienced a cumulative gain of 207%, outpacing even the 140% cumulative gain of the S&P 500 (Google Finance API, 2018b). Even during a historically long market expansion, large national homebuilding firms have outperformed the overall market of publicly traded firms.

⁸However, we are unable to find any evidence that the Department of Justice or the Federal Trade Commission engaged in any regulatory intervention regarding any of these mergers.

Unfortunately, considering the strategic and cost advantages enjoyed by the largest homebuilding firms, it seems likely that the current consolidation will persist and that many local markets will remain highly concentrated. [McGraw Hill Construction \(2006\)](#) predicts that “homebuilder profitability will favor large multi-regional players” while [O’Hollaren \(2017\)](#) notes that “revenue is increasingly concentrated among the largest businesses in the industry”. Accordingly, the role of high concentration in housing market cycle dynamics merits further investigation.

3 Empirical approach

We investigate the impact of market concentration on the volume, volatility, and pricing of new housing. Our choice of market outcome variables is disciplined by the theoretical model of housing construction in oligopoly presented in [Appendix A](#).

For each outcome variable y , we estimate the following specification across markets m and years t :

$$y_{mt} = \beta D_{mt} + \gamma X_{mt} + \lambda_m + \mu_t + \varepsilon_{mt} \quad (1)$$

In Equation 1, D_{mt} is a measure of competition intensity and X_{mt} is a vector of covariates. Our interest lies in determining the causal effect of competition on the outcome variables, which would be captured by β , in the absence of endogeneity issues. We use an instrumental variable to address the endogeneity of competitive intensity. Our analysis incorporates market and year fixed effects λ_m and μ_t and market weights by population in the 2005–2009 American Community Survey. Estimation is performed using heteroskedasticity-robust standard errors.

3.1 Market definition

We delineate markets for new housing following the Census definition of places. Places include incorporated cities (e.g. Poughkeepsie, NY), towns (e.g. Leesburg, VA), and boroughs (e.g. Norristown, PA) as well as Census-designated places in areas without municipal boundaries (e.g. Columbia, MD). To exclude small markets with limited construction activity, we only include places with a 2015 population of at least 25,000 ([U.S. Census Bureau, 2015a](#)).

Places determine a suitable definition of housing markets as they approximately match the spatial range over which consumers search for new housing. Previous literature has used the metropolitan statistical area (MSA) as a unit of analysis. However, an MSA appears to be too large and heterogeneous to behave as a single market. Each MSA is composed of collections of counties and therefore reflects a combination of historical political boundaries and

modern economic conditions [Rozenfeld et al. \(2011\)](#). MSAs contain many local government units — for example, the Washington, DC MSA is comprised of 24 counties or equivalents, several of which are further divided into cities and towns. Moreover, the communities within a MSA vary widely in terms of amenities and resident income — for example, in the Philadelphia MSA, the median household income in Camden, NJ is 36% of the median household income in Levittown, PA ([U.S. Census Bureau, 2016](#)). These differences are capitalized into the price of housing — for example, median home values in Ellicott City, MD are more than triple median home values in Baltimore [U.S. Census Bureau \(2016\)](#). This heterogeneity is highly salient to market delineation; price dynamics for expensive and inexpensive housing within the same county can differ sharply ([Landvoigt et al., 2015](#); [Liu et al., 2016](#)).

Empirical evidence on search behavior also suggests that prospective homebuyers' search areas are much smaller in scale than a MSA. [Piazzesi et al. \(2015\)](#) report that one-quarter of prospective buyers in the Bay Area search in only a single zipcode. The remaining three-quarters tend to search among a tight cluster of zipcodes; the median search has a mean geographic distance of 3.2 miles and a car travel time of 13.1 minutes between zipcode centroids. This is comparable in scale to the places in our sample.

Additionally, prices are expected to have high correlations within the relevant markets. We collect median housing price data at the zipcode, place, county, and MSA level from [U.S. Census Bureau \(2016\)](#). Zipcode level prices correlation is the highest within place. The place-level median price explains 65% of the variation in zipcode-level median price whereas the county-level median price explains only 50% of the variation and the MSA-level median price explains only 27% of the variation.

Finally, for all of our empirical results, we perform robustness tests that include the competitive intensity in rings of nearest-neighbour adjacent zipcodes as additional regressors to test if the market conditions outside of our defined markets are affecting market outcomes (see appendix [Appendix C.6](#)). Additional tests define markets using housing characteristics, demographics characteristics (income, family size, and racial composition) and shared commuting destinations. This approach uses k-means clustering to define markets that do not have to be necessarily adjacent in space.⁹ These tests provide further evidence that our definition of places are a reasonable definition for the salient market for homebuyers and that results are robust to changes in the definition.

Accordingly, the results presented below use places as the unit of analysis throughout. [Figure 4](#) shows the markets included in the sample. Under this definition, the majority of

⁹This is a standard method in data mining initially proposed in [MacQueen \(1967\)](#) as a method to group observations into clusters based on some similarity measurement criterion. Results give us similarly sized markets and are available upon request

our markets are suburban communities. Despite the highly visible construction in dense urban centres, new housing remains concentrated in the suburbs. In the second half of the twentieth century nearly all growth in urban population and land area occurred in the suburbs (Nechyba and Walsh, 2004). Between 2000 and 2010, the population grew faster in the suburbs than in the city centre in 98 of the hundred largest metropolitan areas (Couture and Handbury, 2017) and Census data suggests that this pattern has continued in large metropolitan areas since 2010 (Frey, 2018). Accordingly, our market definition reflects the real-world geography of new housing construction.

3.2 Measuring competition

We use a novel data set on residential construction to construct a measure of local competitive intensity. To account for potential endogeneity between housing market activity and market concentration we also use this data set to construct an instrumental variable.

3.2.1 Metrostudy data

To quantify market competition and understand how firms respond to their market power and the market power of their competitors, we use data from Metrostudy. Metrostudy monitors residential development and property transactions to identify the firms building and selling individual housing units at a fine level of spatial disaggregation (Metrostudy, 2018). This dataset also provides information on attributes of new units including their size and price as well as information on firms' characteristics including the overall scale of their operations. Although this dataset is widely used in private industry, to the best of our knowledge this is its first use in the academic literature.

Our sample consists of places in the metropolitan areas centered on Philadelphia, Washington DC, Baltimore, Allentown, PA, Atlantic City, NJ, Dover, DE Salisbury, MD, Trenton, NJ, Winchester, VA, and Vineland, NJ as well as large parts of the New York metropolitan area excluding New York City itself. As mentioned above we exclude places with less than 25,000 residents. This leaves 137 local housing markets with a total population of 9.26 million (U.S. Census Bureau, 2015a). We use data from 2005 through 2016 aggregated to the national level. Production volume in these markets has followed the national trajectory described in Section 1. The number of housing units produced fell 66% from 2006 through 2011 and then remained low even as the economy recovered — in fact, the number of units declined a further 20% from 2011 through 2016.

We measure competitive intensity by the minimum number of firms building 90% of new housing in a given market-year. This measure excludes small firms building a small number of highly customized luxury housing units and therefore effectively captures the number of

active market participants.¹⁰ Figures 1 and 4 show this measure for the markets in our sample.

3.2.2 Instrumenting for concentration

In Equation 1 it is possible that competition is endogenous to market outcomes — that is, that $\text{cov}(D_{mt}, \varepsilon_{mtj}) \neq 0$. This endogeneity could arise from local shocks that simultaneously impact competition and housing market outcomes. For example, a change to permit approval policy could affect both the number of active firms and the number of units produced. We construct an instrumental variable to address this concern.¹¹

Specifically, we construct an instrument from the predicted behaviour of national firms¹². We forecast the construction activity of a national firm j in market m using the activity of that firm j in all markets other than m . This instrument relies on the wide distribution of national firms' residential construction activity across the United States. National firms' production decisions are particularly influenced by the changes to the national environment, factors that are exogenous to local market conditions as described in section 2. This strategy is analogous to the shift-share instrument introduced to the economic literature by Bartik (1991) and Blanchard et al. (1992). Appendix Appendix B contains implementation details.

Since the instrument uses a measure of the average growth in activity of a national firms j in all markets other than the focal market m , the instrument is increasing in the activity of the corresponding national firm. As this activity grows, market shares in the focal market are expected to grow. Accordingly, one would expect a negative correlation between the instrument and $COMP_{mt}$. Indeed, the unconditional correlation between the instrument and $COMP_{mt}$ is negative (-0.094) and statistically significant. When reporting results in Section 4.1 we include the first-stage F -statistic throughout. Because our regression specification includes only one endogenous regressor, this is equivalent to the Cragg-Donald statistic described in Cragg and Donald (1993). In every regression reported in this study, we reject the possibility of a weak instrument according to the tests described in Stock and

¹⁰Our results are robust to the use of the Herfindahl index and other concentration measures.

¹¹With an endogenous treatment D , we have the following path analysis diagram (Cunningham, 2021)

$$\begin{array}{ccccc} Z & \rightarrow & D & \rightarrow & Y \\ & & \uparrow & \nearrow & \\ & & \pm & & \\ & & \epsilon & & \end{array}$$

The error ϵ includes the unobservable market characteristics, like unobserved policies, that we worry can simultaneously determine treatment and outcome, while the instrument Z has the property that its variation is associated with changes in D but do not lead to changes in the outcome Y (aside from the indirect route via D). The direction of the bias depends on the sign of the correlation of the unobserved components in ϵ that are correlated with the treatment D .

¹²The Metrostudy data set categorizes each firm as national, regional, local, or micro depending on their total production. The data set includes 87 nationally-active firms.

Yogo (2005). We also report the p -value of the coefficient on the instrument in the first stage of the regression.

The national firms whose activity we use to generate the instrument are present and highly active across the markets in our sample. Figure 5 shows the cumulative distribution of the share of production accounted for by national firms in the market-year pairs in our sample. As shown, national firms produce housing in 74% of market-year pairs in the sample. They account for at least 10% of production (and therefore impact the number of firms accounting for 90% of production) in 64% of market-year pairs and account for the majority of construction in 40% of market-year pairs.

The rationale for this instrument is similar to that followed in the instrument for competitive intensity in Atalay et al. (2017): from the point of view of a very large nationally active firm, individual cities are effectively negligible. This assures our exclusion restriction. As required, national firms are present in multiple markets beyond our sample. For example, Pulte Homes is active in 49 metro areas in 25 states, CalAtlantic in 49 metros in 21 states, and NVR in 31 metros in 14 states.¹³

Furthermore, each of the markets in our sample constitutes a small share of the overall national activity of the large national firms. For each national firm j , we compare Metros-tudy's measure of national sales volume by firm j to its activity in markets in our sample. We calculate the share of units produced by national firm j in market m in year t relative to its nationwide production in year t . The median of this measure across all (m, t, j) tuples is 0.25% and the mean is 2%. Only (m, t, j) tuples above the 95th percentile of the distribution include situations where a single market comprises 10% of a national firm's activity. The share of overall construction by a national firm in any one market has decreased over time. In 2005 the median share of total construction volume in a single market in our sample for a national firm was 0.32% and the mean was 2.4% whereas in 2016 the median was 0.18% and the mean was 1.1%. Although national firms' overall market share has increased, the growth in their activity has been sufficiently uniform across markets that no market in our sample has become an outsized share of a national firm's overall portfolio.

The solid line in Figure 6 shows the concentration value for each instrument value on the horizontal axis. This graph is a flexible representation of the first-stage equation estimated in our 2 stage least squares estimation of equation 1 with estimates from a local linear regression. Following Arni and Schiprowski (2019); Bhuller et al. (2020), we regress the instrumental variable on the treatment variables, both residualized to control for the covariates included

¹³Related recent work (Garcia Lembergman, 2020) shows that large national retail chains propagate regional and national shocks across local markets where they have a presence. This is also the true for developers, who change their activity in all the markets they are active in as a reaction to shocks in a specific market (Van Straelen, 2018).

in the estimated equation. The minimum number of firms building 90% of new housing in the local market is monotonically increasing with the value of the instrument defined in equation A3. The relationship is close to linear.

3.3 Measuring demand

To estimate Equation 1, we require a measure of demand for housing in market m at time t . We use the number of jobs accessible from market m as a measure of demand. Specifically, we calculate the number of jobs within fifty miles¹⁴ of housing market m (Bureau of Labor Statistics, 2017). To avoid potential endogeneity between economic activity in market m and housing construction in market m we follow papers including Bayer et al. (2007) by excluding county m — that is, we only consider jobs outside the county in which m is located. Excluding jobs in market m and all markets with which it shares a county produces a measure of demand which is exogenous to competitive intensity in market in m at t .

3.4 Measuring construction cost

We use data from RSMeans (2016) (as used by Gyourko and Saiz (2006) and others) to account for differences in the cost of construction across markets. The markets for the materials and labour needed for housing construction are larger than any individual place and the factors of housing production are largely mobile across firms and markets. Accordingly, we regard the construction cost as exogenous to local competitive intensity. We use the RSMeans overall index which measures the total cost of construction including both materials and labour. The data set includes a price index for each three-digit zipcode and a price index for each year. We map these three-digit zipcodes to the markets in our sample and multiply the market index by the year index to obtain a value for each market-year pair.

4 Results and discussion

We present empirical results that demonstrate the impact of market concentration in homebuilding on housing market outcomes. Then, we conduct a counterfactual exercise to quantify the impact of these changes on the scale of the macroeconomy.

¹⁴Fifty miles appear to be a salient radius for commuting in our sample. For instance, 5% of workers in Fredericksburg City, VA, 11% of workers in Orange County, NJ, and 12% of workers in Suffolk County, NY commute to a county more than fifty miles away. Long commutes within fifty miles are even more common; the majority of workers in Loudoun County, VA commute to a county at least 25 miles away (McKenzie, 2013).

4.1 Empirical results

We measure the effect of concentration on market outcomes by estimating regression models of the form specified by Equation 1. The measure of concentration is the logarithm of the number of firms accounting for 90% of production. Throughout, all outcome variables are expressed in logarithms. Accordingly, the coefficient on competitive intensity represents an estimated elasticity. We show OLS estimates as well as estimates with the instrument for competitive intensity discussed in Section 3.2.2. Additional results in Appendix Appendix C demonstrate the robustness of our results to changes in sample and specification.

For all regressions, the F-statistics range from 22 to 28, indicating that weak IV is not a concern.¹⁵

Table 1 shows summary statistics for the data set used in these regressions. Volatility is the absolute change of average price per square foot and number of units for sale. The supply in the pipeline is the total number of units either under construction, used as models for display, or vacant and unsold.

4.1.1 Production volume

Table 2 shows estimated coefficients where the dependent variables are the volume of housing produced as measured by the dollar value of new housing built, the square feet of housing built, and the number of new units sold. We find that concentration causes significantly less housing to be produced. In the IV specifications the volume of housing is positively although not significantly associated with nearby jobs. Unsurprisingly, the volume of new housing has a robust negative relationship with the cost of production.

Our estimates suggest that in the average market a decline from six firms producing 90% to housing to five firms producing 90% of housing (the change in median from 2006 to 2015) with all else equal would lead to a 15% reduction of the value of housing produced, a 16% reduction of the total square footage, and a 11% reduction of the number of housing units. This result is consistent with the theoretical prediction of production decisions in an oligopolistic market. However, it is difficult to reconcile with models that include a competitive sector of atomistic price-taking construction firms.

Overall, the estimated IV coefficients are at least five times larger than the OLS coefficient, suggesting endogeneity is causing a downward bias. We previously discussed the concern about endogeneity in the presence of unobserved local dynamics. If local policies reduce both the number of active firms, competition, and the number of units produced, OLS will overestimate the positive effect of competition on supply. In contrast, we empirically get

¹⁵Our result also passes a robust test for weak instrument developed in [Olea and Pflueger \(2013\)](#) with an effective F statistic at 27.886.

that OLS underestimates the effect of competition on supply. This is consistent with a situation in which opposing forces are at play: a positive causal effect of competition on supply and a negative correlation between supply and concentration. The latter could happen if large developers with better capacity to operate at scale sort into the suburbs, an area where most of the new construction is occurring in our period of study (Couture and Handbury, 2017).¹⁶ Larger developers could also have advantages in navigating complicated suburban local regulatory requirements. Both could explain this downward bias in OLS. Therefore, by removing the correlation driven by larger developers and projects sorting to the suburbs that show more new construction from the OLS estimation, our IV results indicate a much larger causal effect of competition on supply.¹⁷

4.1.2 Supply in pipeline

The presence of competitors affects the timing of homebuilders' production decisions. As noted by Mueller (1995) and formalized by Grenadier (1996), the real estate market cycle is driven by firms competing to build quickly to satisfy unmet demand and gain a first-mover advantage in a growing market. Interfirm competition generates a rush to build. As the number of market participants increases this can result in overbuilding.¹⁸ The theoretical framework of Mueller (1995) broadly informs market participants' understanding of real estate cycle dynamics. Media reports similarly emphasize the role of competition between builders in driving supply in the commercial (Schnurman, 2010), retail (Sandler, 2000), and residential (O'Connell, 2011; Gopal, 2016) construction sectors.

Table 3 shows regression coefficients where the dependent variables are measures of the housing supply under development. First we consider the effect of competition on the total

¹⁶Robustness tests in Appendix C.2 contains regression results that control for the differences in markets in which existing housing makes up a higher share of overall supply than new units built.

¹⁷More precisely, we can calculate the total derivative of the regression equation $Y = \beta D + \epsilon(D)$ (Cameron and Trivedi, 2005)

$$\frac{dY}{dD} = \beta + \frac{d\epsilon}{dD} \quad (2)$$

where $\frac{d\epsilon}{dD} \neq 0$ causes the OLS bias. The sign of this factor determines the bias direction. The IV coefficient identifies the true effect, which we find to be larger than the OLS estimate. This implies $\frac{d\epsilon}{dD} < 0$, and is consistent with markets with more concentration having more supply for other factors that are not part of the causal relationship.

¹⁸Mueller (1995) writes:

In a competitive capitalistic market, developers must speculate and start the process of planning development or building new products earlier than the actual demand materializes to edge out other developers who also want a share of the market. In the absence of collusion, this speculative behavior, along with the lumpy nature of real estate product, makes it easy to overshoot actual needs.

number of units in the production pipeline — specifically, the total number of units either under construction, used as models for display, or vacant and unsold. Then, we estimate the effect on the total number of units ready for sale, as well as the total number of subdivisions in which homebuilders are active. Access to pipeline data is a unique feature of our data that allows us to explore oversupply.

As shown, the theoretical prediction is borne out. A greater degree of competitive intensity is associated with more units in the pipeline, more finished units ready for sale, and more subdivisions in which homebuilders are active.

4.1.3 Price and production volatility

Classical models of noncooperative firm strategy under oligopoly (as reviewed in [Shapiro \(1989\)](#)) predict that a small set of firms will compete on price whereas a larger set of firms will instead compete on quantity. Accordingly, we expect demand uncertainty to be reflected through price volatility in more concentrated markets but through quantity volatility in more competitive markets. To test this, we investigate the absolute change in housing price per square foot and the absolute change in the number of housing units as dependent variables. [Table 3](#) shows the results of these regressions. Higher competitive intensity leads to greater supply volatility and lower price volatility.

4.2 Interpretation of results

The results in [Section 4.1](#) show that the decline in competitive intensity in local housing construction has altered the dynamics of the real estate cycle. More concentrated markets feature lower levels of production, less volatility in production, and greater volatility in prices. These effects are statistically significant and economically meaningful. As shown in [Appendix C](#) these effects are also robust to changes of sample or specification.

Throughout [Section 4.1](#) our results show larger magnitudes for the coefficient on competitive intensity in the IV specifications than in the OLS specifications. As discussed in [Section 3.2.2](#), our instrumental variable relies on the behaviour of large national firms. The growth of large national firms' market power over the sample period (as described in [Section 2](#)) motivates this choice of instrument. Accordingly, the identifying variation of the instrument is strongest in markets where large national firms are highly active and the local average treatment effect measured in our IV results ascribes a higher weight to these markets. Moreover, our instrument construction requires the presence of national firms. Therefore, our results in the main body of the paper exclude markets where national firms are not active¹⁹.

¹⁹[Appendix C](#) includes results that examine the impact of this restriction on our sample. As shown, OLS results are largely unchanged with the larger sample (with the exception of price volatility where

We acknowledge that our IV results may be most externally valid in markets where large national firms were highly active.

Our results reflect private industry understanding as reported in the media ([Lahart, 2017, 2018](#)), as well as real estate cycle model proposed by [Mueller \(1995\)](#) and widely used as a conceptual model in private industry. These results may also be rationalized by a simple theoretical model of oligopolistic firms choosing the timing of irreversible construction decisions in the context of uncertain future demand as outlined in [Appendix A](#). When many firms are competing to build, they build early to preempt their competitors. This increases total housing production, raises the volatility in the supply of housing, and creates a surplus of unfinished units. Conversely, in a more concentrated market, firms can time their housing production to maximize their profits without fear of pre-emption. This lowers production volumes but increases price volatility as firms with market power can opt to build when demand growth is strongest and charge prices higher above their marginal cost of production.

4.3 Counterfactual exercise

In order to understand the macroeconomic significance of our results, we consider a counterfactual scenario where the level of competition in the housing market in 2015 remained at its higher 2006 level. Suppose that, absent the developments discussed in [Section 2](#), the level of competition had held constant at pre-recession levels in markets throughout the United States. What would this imply for the state of the present housing construction market?

So far, we have used data on local competitive intensity and market outcomes for a set of markets in the northeastern United States using Metrostudy data. We extend our results to the remainder of the country using Zipcode Business Patterns data. [Appendix D](#) describes this process.

[Figure 7](#) compares the distribution of competitive intensity (as inferred from Zipcode Business Patterns data) for the markets in our sample with the distribution for the entire United States. As shown, the fit from Zipcode Business Patterns data suggests that the distribution of competitive intensity in our Metrostudy sample is similar to the distribution for the overall United States. This correlation is robust to the choice of assumptions used to map from Zipcode Business Patterns to market concentration described in [Appendix D](#).

Some caveats apply to the external validity of the counterfactual exercise. While the distribution of competitive intensity in our sample is similar to the distribution in the United States overall, the markets in our sample may differ from other markets in other ways. The markets in our study appear to be in the middle of the national distribution for housing

the coefficient on competitive intensity loses statistical significance).

supply elasticity in [Saiz \(2010\)](#).²⁰ Thus, these markets may not experience identical dynamics to highly constrained markets or very unconstrained markets. Moreover, our analysis focuses on markets with at least 25,000 residents and therefore excludes small towns and rural areas. As discussed in Section 4.2, our IV estimates derive their identifying variation from the behaviour of large national firms and therefore our estimates are most valid for markets where large national firms are highly active.

Under this set of assumptions, the median number of firms accounting for 90% of production across all markets in the United States from 2006 through 2015 fell from 6.18 to 4.78 — i.e., a decrease of 23%. Weighting the markets by pre-period population (as measured in the 2015 five-year American Community Survey estimates) does not appreciably alter this result. Table 5 shows how much the 2015 outcomes have changed relative to a baseline where competitive intensity remained at 2006 levels. We calculate 95% confidence intervals from the standard errors of the IV estimates. As shown, the impact is relatively uniform across the distribution of competitive intensity.

These estimates imply that the decrease in competition has impacted housing markets in economically meaningful ways. The total value of private residential construction in 2015 was \$423 billion ([U.S. Census Bureau, 2017b](#)). Estimates from Table 5 indicate that absent the decrease in competition, the total value of new housing would be approximately \$106 billion greater. The \$106 billion difference in construction value is equivalent to 3.4% of all private fixed investment in the United States economy in 2015 ([Bureau of Economic Analysis, 2017a](#)). Moreover, this is equivalent to 0.6% of 2015 GDP. This is comparable to the scale of the decline in residential investment [Leamer \(2007\)](#) identifies prior to previous recessions.

In 2015, 529,000 new single-family units and 398,000 new multi-family unit started construction for a total of 857,000 new units ([U.S. Census Bureau, 2017a](#)). Estimates from Table 5 suggest that if market concentration had remained at 2006 levels then an additional 150,000 units would have been built in 2015.

Finally, our results also suggest that price volatility would be much lower under the counterfactual 2006 levels of market concentration. Data from Zillow suggests that between 2013 and 2017 the average absolute annual change in house prices at the market level was 5.5%. According to our estimates, this would be reduced to approximately 2.4% under 2006 competitive intensity levels.

²⁰Seven of the metropolitan areas in [Saiz \(2010\)](#) have principal cities included in our Metrostudy sample. The supply elasticity rankings for these seven metropolitan areas range from the 27th percentile to the 60th percentile of the national distribution.

5 Conclusion

In this study we examine the impact of market concentration on the production of new housing. We document the high and rising market concentration at the level of local housing markets. Our empirical results indicate that a higher degree of concentration in local housing construction markets leads to less housing production, a decreased rush to build more units, and greater volatility in prices. These findings are compatible with stylized results in the literature on real estate cycles and the literature on oligopoly as well as private industry's understanding of real estate market dynamics. Our parameter estimates imply that the increasing concentration in the production in housing has led to a substantial reduction in the volume of housing produced as well as in the inventory of new vacant units.

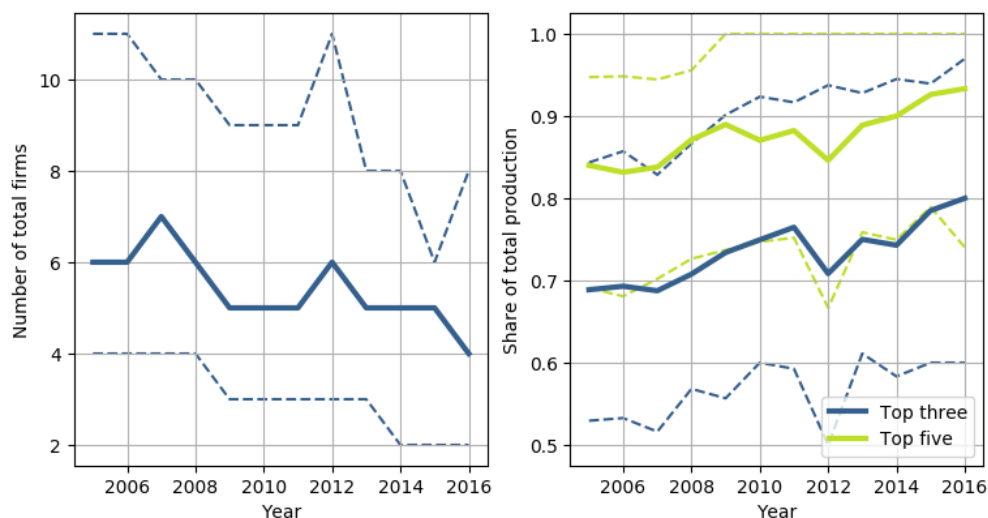
Our counterfactual exercise suggests that the increase in market concentration from 2006 through 2015 led to the production of \$106 billion less housing per year. This equivalent to 3.4% of the value of private fixed investment in 2015. The reduction in housing construction from the increase in local market concentration has meaningful effects on overall macroeconomic investment.

The empirical results of this study indicate potential future directions for macroprudential policy. For example, regulators in Hong Kong and Korea have attempted to stem housing speculation by setting loan-to-value limits that reflect the perceived degree of risk in residential mortgages (Lim et al., 2011); these rules appear to have had a meaningful impact on house price dynamics in Korea (Igan and Kang, 2011). The efficacy of these policy interventions is predicated upon policymakers' ability to identify the potential for price volatility in different markets. Our research indicates that this may be a particularly significant concern in markets with high levels of concentration.

The study also has implications for local policymakers. Municipal and regional governments have implemented a wide range of strategies to increase the supply or lower the cost of housing but to date these policies do not appear to take into account the role of competition between builders in providing new housing (Kingsley and Williams, 2007; Bellisario et al., 2016; Kalugina, 2016; MacDonald, 2016). Insofar as local governments could influence the level of competitive intensity through permit allocation, our results indicate a novel channel for influencing the supply of new housing.

The production of new housing is an integral component of the growth of cities as well as the macroeconomic cycle. In this study, we demonstrate empirically for the first time the impact of local housing market concentration on housing market dynamics. This research provides a direction for understanding the role of firm behaviour and the scope for policy intervention in the supply of new housing.

Figures and Tables

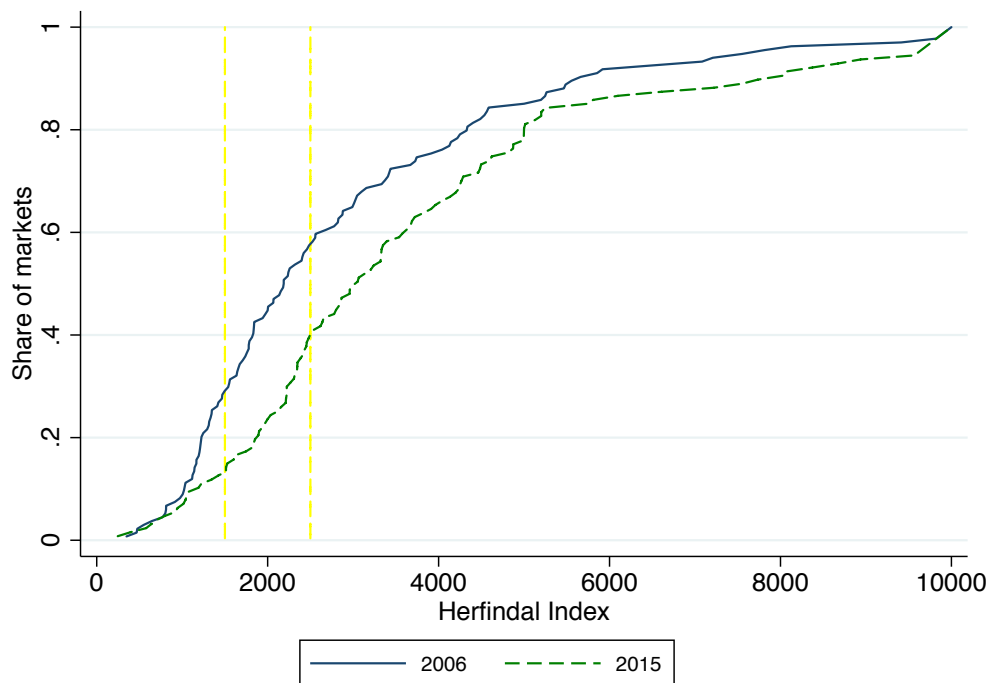
Figure 1: EVOLUTION OF CONCENTRATION IN LOCAL HOUSING MARKETS

Notes: Measures concentration in local housing markets. The left panel shows the number of firms accounting for 90% of housing construction and the right panel shows the share of production accounted for by largest three and largest five firms in each market. The solid line shows the median market and the dashed lines show the first and third quartiles.

Table 1: SUMMARY STATISTICS FOR THE DATA USED IN THE REGRESSION ANALYSIS.
THE UNIT OF OBSERVATION IN THIS TABLE IS A MARKET-YEAR TUPLE.

	N	Median	Mean	Std. Dev.	Min.	Max.
Number of firms producing 90%	1581	6	8.6	11.7	1	129
Jobs within 50 miles (millions)	1600	3.5	4.3	2.1	0.1	8.5
Construction cost index	1600	18.9	19.1	2.7	12.9	25.2
Total value (\$ million)	1580	29.2	76.2	134.2	0.1	1387.0
Total square footage (thousands)	1546	173.3	378.1	598.7	0.8	7863.3
Units sold	1581	67	158.8	266.9	1	2706
In pipeline	1600	737.5	2801.3	4628.9	0	26203
Ready for sale	1600	3	30.7	88.2	0	1405
Active subdivisions	1600	3.5	8.4	12.9	0	132
Price volatility	1392	15.2	30.8	65.4	0.1	1364.9
Production volatility	1455	3	16.9	50.1	0	878
Firms per market-year	1600	10	15.7	22.7	0	225
National firms per market-year	1581	2	2.4	2.6	0	17
Observations	1600					

Figure 2: EVOLUTION OF CONCENTRATION IN LOCAL HOUSING MARKETS - HERFINDAL INDEX



Notes: Cumulative distribution of Herfindahl indices for all markets in the sample in 2006 and in 2015. The dashed lines denotes the Federal Trade Commission standard for “moderately concentrated” and “highly concentrated” markets.

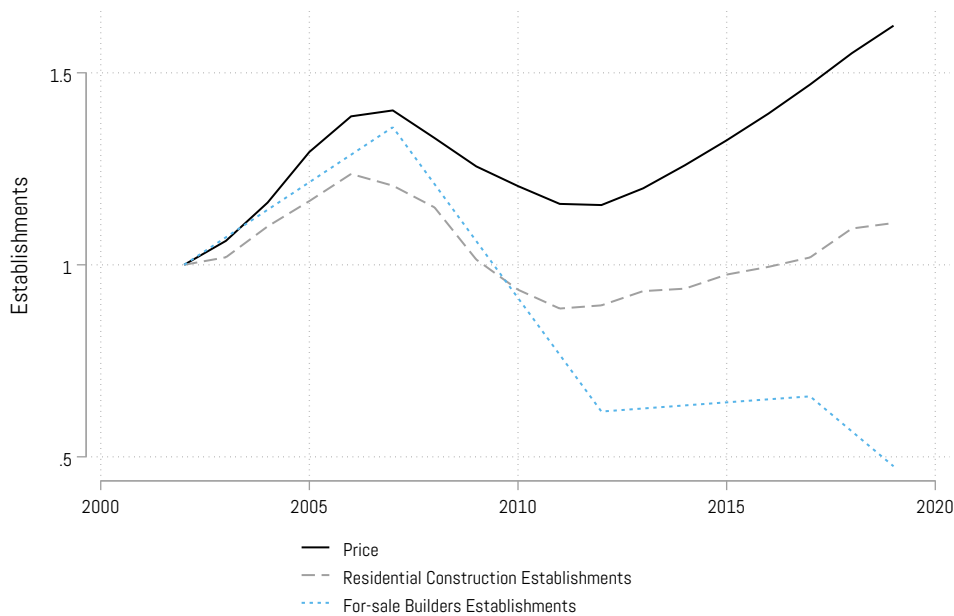
Table 2: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE VOLUME OF HOUSING SUPPLIED.

	Total value		Square footage		Units	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.17*** (0.040)	0.87*** (0.25)	0.17*** (0.039)	0.91*** (0.25)	0.082** (0.040)	0.62*** (0.24)
Jobs within 50 miles	-2.97** (1.41)	2.71 (2.58)	-2.58* (1.37)	3.38 (2.55)	-1.04 (1.43)	3.33 (2.46)
Construction cost	-0.44*** (0.089)	-0.43*** (0.10)	-0.33*** (0.086)	-0.32*** (0.10)	-0.32*** (0.090)	-0.32*** (0.098)
Observations	927	927	925	925	927	927
R ²	0.572		0.497		0.530	
1 st Stage F	27.483		27.390		27.483	
1 st Stage p-value	0.000		0.000		0.000	

Standard errors in parentheses.

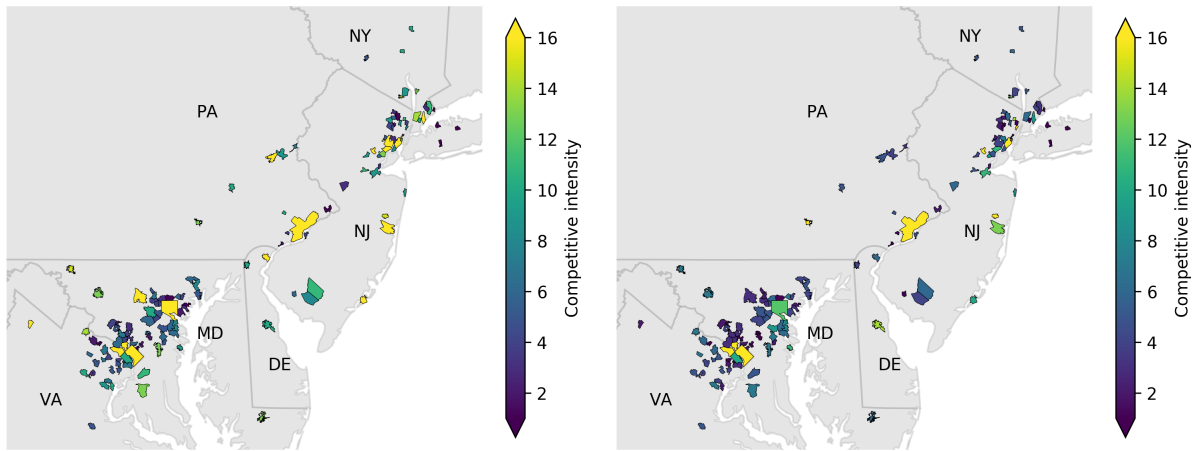
All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Figure 3: NUMBER OF ACTIVE BUILDERS OF RESIDENTIAL UNITS

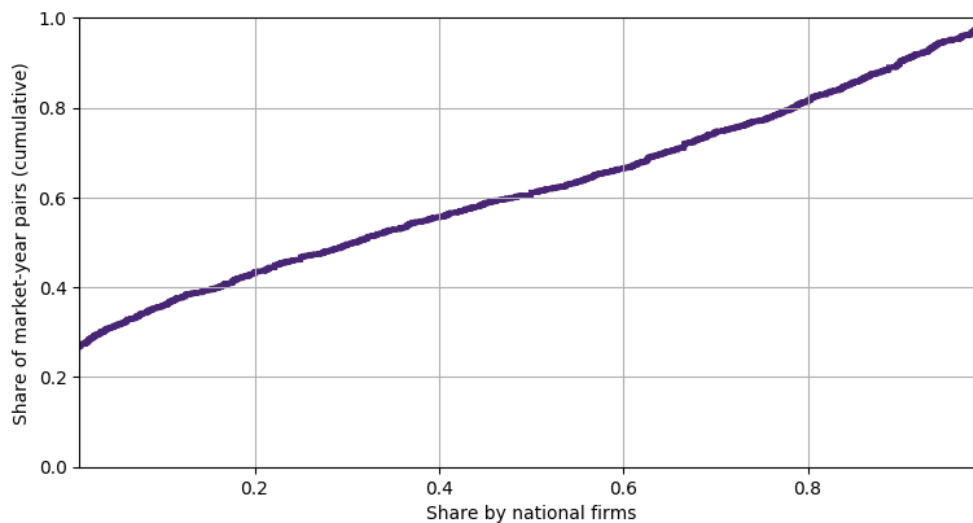
Notes: The series for Residential Construction refers to the number of establishments classified under the NAICS code 2361. This category includes single and multi-family builders, general contractors, design-build firms, and construction management firms. The series for For-sale Builders refers to the number of establishments classified under the NAICS code 236117. This category only includes firms engaged in building new homes on land that is owned or controlled by the builder, the bulk of large scale developers. Number of establishments come from the Census Bureau's Economic Census²¹. Price corresponded to the U.S. Federal Housing Finance Agency All-Transactions House Price Index. All series are normalized to their own value in 2002.

Figure 4: SPATIAL DISTRIBUTION OF CONSTRUCTION DATA AND EVOLUTION OF MARKET CONCENTRATION

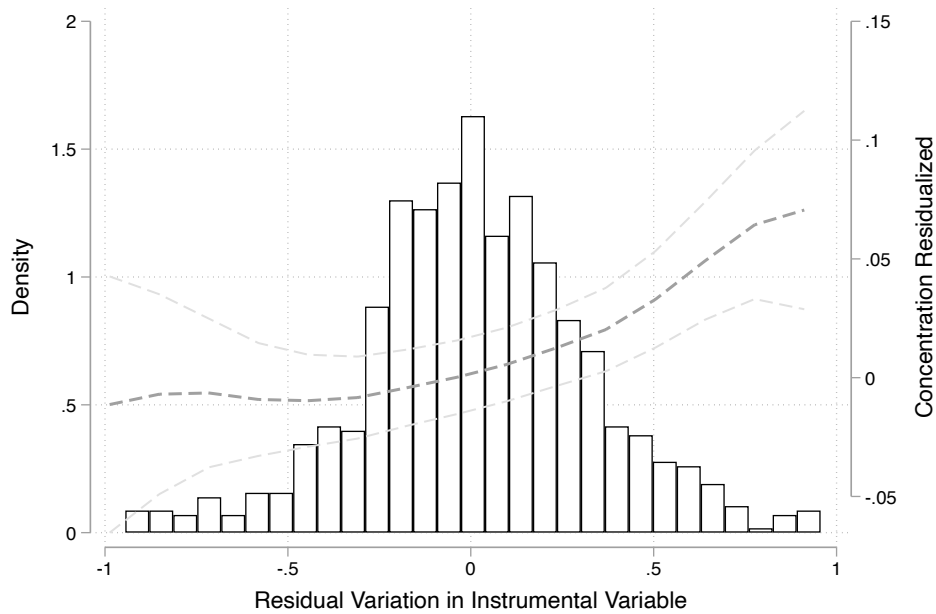


Notes: Markets included in the Metrostudy data. The degree of competition shown on this map is the number of firms accounting for 90% of construction. The left panel shows the values in 2006 and the right panel shows the values in 2015.

Figure 5: NATIONAL FIRMS ACTIVITY



Notes: Cumulative distribution of the share of units accounted for by national firms across all market-year pairs.

Figure 6: FIRST-STAGE GRAPH OF THE IV ON RENT STABILIZATION

Notes: Market concentration, the treatment, is plotted on the right vertical axis against the instrument, which is shown along the horizontal axis. The plotted values are residuals of regressions that include all controls from equation 1. The remaining variation of the residualized variables of the treatment and the instrument determine the concentration measures coefficient in the first stage of the 2-stage IV regression. The thicker line shows a local linear regression of our instrument on rent stabilization and the lighter lines show a 90% confidence interval. The histogram shows the density of the instrument along the left vertical axis. This graph follows [Arni and Schiprowski \(2019\)](#); [Bhuller et al. \(2020\)](#).

Table 3: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE PIPELINE OF HOUSING PRODUCTION.

	In pipeline		Ready for sale		Active subdivisions	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.19*** (0.020)	0.40*** (0.10)	0.49*** (0.093)	2.88*** (0.63)	0.42*** (0.033)	1.51*** (0.26)
Jobs within 50 miles	-7.24*** (1.15)	-6.33*** (1.32)	-13.5** (5.44)	-2.32 (8.23)	1.91 (1.96)	6.54** (3.31)
Construction cost	4.38*** (0.31)	4.68*** (0.36)	-0.12 (1.46)	3.76 (2.30)	3.54*** (0.51)	5.09*** (0.89)
Observations	690	690	651	651	688	688
R ²	0.642		0.161		0.376	
1 st Stage F	25.725		24.683		25.924	
1 st Stage p-value	0.000		0.000		0.000	

Standard errors in parentheses

Firms producing 90% and all dependent variables are introduced in logarithms.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

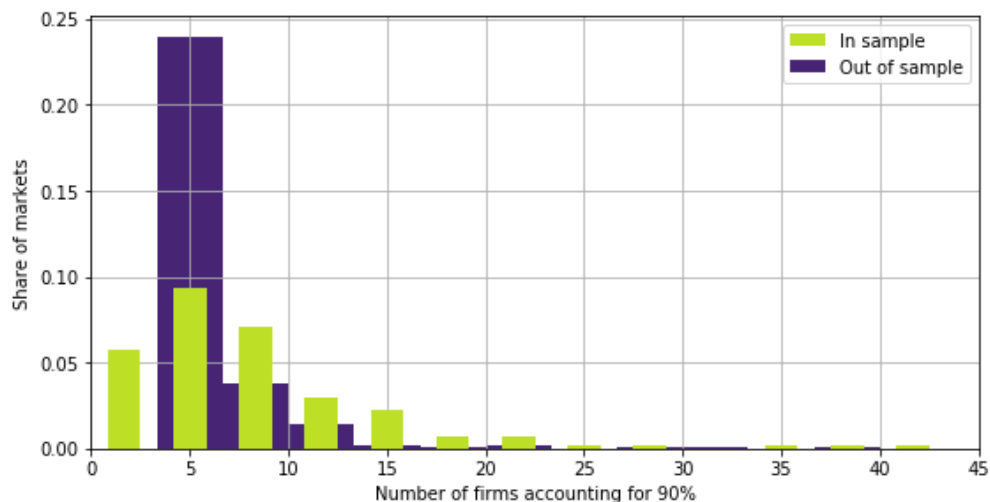
Table 4: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON PRICE AND PRODUCTION VOLATILITY. INCLUDES COMPARISON TO OLS RESULTS WITH ALL MARKETS.

	Price volatility		Production volatility	
	OLS	IV	OLS	IV
Firms producing 90%	-0.23** (0.10)	-3.24*** (0.78)	0.68*** (0.12)	3.84*** (0.86)
Jobs within 50 miles	-9.32*** (3.58)	-33.5*** (7.92)	4.37 (6.90)	18.4* (10.6)
Construction cost	-0.50** (0.23)	-0.54* (0.32)	-14.9*** (1.86)	-9.98*** (2.98)
Observations	924	924	658	658
R ²	0.093		0.298	
1 st Stage F	27.390		22.603	
1 st Stage p-value	0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Figure 7: OVERLAP OF MARKETS IN AND OUT OF SAMPLE IN THE COUNTERFACTUAL EXERCISE

Notes: Predicted number of firms accounting for 90% of housing construction in each market in the United States based on 2006. Predicted values obtained from fit to Zipcode Business Patterns data. Narrow green bars show Metrostudy markets and broad blue bars show the rest of the United States.

Table 5: COUNTERFACTUAL RESULTS

	25 th	Median	75 th
Number of firms producing 90% in 2006	6.13	6.18	6.39
Number of firms producing 90% in 2015	4.63	4.78	5.47
Δ Value of housing produced (%)	-22	-20	-13
	[-32, -10]	[-30, -9]	[-19, -6]
Δ Number of units produced (%)	-16	-15	-9
	[-26, -4]	[-25, -4]	[-16, -2]
Δ Price volatility (%)	67	130	146
	[30, 113]	[54, 243]	[60, 280]

Notes: Predicted competition levels and corresponding changes in value of housing supply and months of finished housing supply in all markets in the United States, evaluated at the 25th percentile, median, and 75th percentile of predicted levels of 2006 competition. 95% confidence intervals indicated.

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Fewer players, fewer homes: concentration and the new dynamics of housing supply (**Online Appendix**)

Appendix A A Theoretical model

This model illustrates the strategic behaviour of firms competing to provide housing in a market with an upward-sloping supply curve for land and a downward-sloping demand curve for housing. It provides a comparative static examination of how market outcomes vary with the number of active firms.

The model focuses on forward-looking firms' production decisions. Specifically, the environment consists of n symmetric firms producing housing over two periods. Firms make a single irreversible decision to build at either $t = 1$ or at $t = 2$. Firms use a Leontieff production technology to combine one unit of land and one unit of materials to produce one unit of housing. Each firm purchases land on a spot market subject to an upward-sloping supply curve at unit price ℓ , combine the land with materials at exogenous unit cost c to produce housing, and sell the housing at unit price p subject to a downward sloping demand curve. That is, conditional on choosing to build at t , the firm seeks to maximize $(p_t - c - \ell_t) h$ taking into account its own impact on p_t and ℓ_t .

Because housing is highly durable and land supply is fixed, both land and housing prices at $t = 2$ are affected by decisions at $t = 1$. Let H_t be the total volume of housing built by firms building at period t . Then, the land price ℓ_t and house price p_t are as follows for $t \in \{1, 2\}$:

$$\begin{aligned}\ell_1 &= \beta_0 + \beta_1 H_1 \\ p_1 &= \alpha_0 + \alpha_1 (Z - H_1)\end{aligned}\tag{A1}$$

$$\begin{aligned}\ell_2 &= \beta_0 + \beta_1 (H_1 + H_2) \\ p_2 &= \alpha_0 + \alpha_1 (2Z - H_1 - H_2)\end{aligned}\tag{A2}$$

In Equations A1 and A2, the price of housing includes an exogenous demand shifter. Its value grows over time from Z to $2Z$. Each firm takes into account its own impact on the supply curve for land and on the demand curve for housing. Accordingly, each firm faces a tradeoff between building at $t = 1$ and $t = 2$. At $t = 1$ land is more plentiful and housing stock which could compete with the firm's output has not yet been built. Conversely at $t = 2$ the demand for housing is higher.

While the model environment comprises only two periods, it captures the intuition of pre-emption and volume decisions by forward-looking homebuilding firms. At any point, firms are effectively in period $t = 1$ facing a given land supply and housing demand curve and deciding whether to build immediately or to wait for the realization of demand growth.

Before proceeding, it is helpful to introduce a normalization convention and some new notation that will clarify expressions later in the text. Specifically, we normalize $\alpha_1 Z \equiv$

1 and let $K = \alpha_0 + \beta_0 - c$. As well, the following parametric restriction will become necessary to ensure positive construction in equilibrium: The supply curve for land, the cost of construction, and the demand curve for housing satisfy $K > \frac{3}{2}$. Qualitatively, this assumption ensures that the construction cost c is not so high relative to the cost of land and the price of housing that firms are unable to generate positive profits.

The solution concept in this model is a symmetric mixed-strategy weak perfect Bayesian equilibrium. The focal firm has beliefs regarding whether the other firms will build at $t = 1$ or at $t = 2$. Specifically, the focal firm believes that a number $m \in [0, n - 1]$ of the other firms will build at $t = 1$ and the other $n - m - 1$ firms will build at $t = 2$ ²² In equilibrium, these beliefs will be consistent with the other firms' actions. We seek a mixed strategy equilibrium; the firm will have a nonzero probability of building at $t = 1$ and a nonzero probability of building at $t = 2$.

For a given focal firm, let \tilde{h}_1 and \tilde{h}_2 be the number of units built of each of the other firms conditional on building at $t = 1$ and $t = 2$. Then, let $h_1^*(m; \tilde{h}_1, \tilde{h}_2)$ and $h_2^*(m; \tilde{h}_1, \tilde{h}_2)$ be the best responses of the focal firm. Taking first-order conditions and rearranging yields the following best responses conditional on building at $t = 1$ and at $t = 2$:

$$\begin{aligned} h_1^*(m; \tilde{h}_1, \tilde{h}_2) &= \frac{1}{2(\alpha_1 + \beta_1)} \left(K + 1 - (\alpha_1 + \beta_1) m \tilde{h}_1 \right) \\ h_2^*(m; \tilde{h}_1, \tilde{h}_2) &= \frac{1}{2(\alpha_1 + \beta_1)} \left(K + 2 - (\alpha_1 + \beta_1) \left(m \tilde{h}_1 + (n - m - 1) \tilde{h}_2 \right) \right) \end{aligned} \quad (\text{A3})$$

As we are interested in a mixed-strategy equilibrium, we seek a situation where firms are indifferent between building at $t = 1$ and at $t = 2$. Imposing symmetry on the decisions of the focal firm and the other firms and rearranging yields the following expression for the difference in optimal profits $\pi_1^*(m)$ and $\pi_2^*(m)$ between construction at $t = 1$ and $t = 2$ as a function of m :

$$\begin{aligned} \pi_2^*(m) - \pi_1^*(m) &= \frac{-1}{4(n - m)^2 (n + 1)^2 (m + 1)} \left[m(-2 - n) + 3n + 1 - K - 3n^2 \right] \times \\ &\left[m^2 (K + 5n + 3) + m(-5Kn = 2K - 5n^2 + 3n + 2) + 2Kn^2 - Kn - K - 3n^2 + 2n + 1 \right] \end{aligned} \quad (\text{A4})$$

In a mixed-strategy equilibrium, the left-hand side of Equation A4 must be equal to zero. The term in square brackets on the first line of Equation A4 has no root with $m > 0$ under Assumption Appendix A. However, the term in square brackets on the second line of

²²Throughout, we consider only the $n > 1$ case. If $n = 1$, in equilibrium the monopolist firm will always wait until the second period to build.

Equation A4 has roots as follows:

$$m_{\pm}^* = \frac{1}{2(K+5n+3)} \left[5n^2 + (5K-3)n + 2(K-1) \pm \sqrt{(5n^2 + (5K-3)n + 2(K-1))^2 - 4(K+5n+3)(2Kn^2 - Kn - K - 3n^2 + 2n + 1)} \right] \quad (\text{A5})$$

It remains to show that Equation A5 describes a valid equilibrium belief — that is, a belief which is supported by a mixed-strategy equilibrium. The solution with the positive sign gives $m_+^* > n$ which is not a valid equilibrium belief. The following lemma will begin to establish that m_-^* does constitute a valid equilibrium belief.

Lemma 1. *The solution m_-^* to Equation A5 is positive.*

Proof. To show that the solution is positive, it is sufficient to show that $(K+5n+3)(2Kn^2 - Kn - K - 3n^2 - 2n + 1)$ is negative. Then, the term under the radical is less than the term outside the radical. Note that this term factors to $(K+5n+3)(n-1)(2Kn+K-3n-1)$. Under Assumption Under Assumption Appendix A and given that $n \geq 1$, this expression is strictly positive. \square

The following lemma establishes the large- n behaviour of m_-^* :

Lemma 2. *As n grows large, $\frac{m_-^*}{n}$ is bounded above by $\frac{1}{2}$.*

Proof. From Equation A5, it is clear that m_-^* is always bounded above by $\frac{5n^2 + (5K-3)n + 2(K-1)}{2(K+5n+3)}$. Dividing by n and taking the limit for arbitrarily large n yields the desired result. \square

In the large- n limit, half the firms are building at $t = 1$ and half are building at $t = 2$. This fraction arises from the growth in the demand shifter from Z to $2Z$. Uneven growth would give a different limit but the intuition would remain unchanged. The following proposition establishes that m_-^* is monotonically increasing in n :

Proposition 3. *The equilibrium beliefs about the number of firms building in the first period m_-^* increases with n sufficiently quickly that $\frac{m_-^*}{n}$ is increasing in n .*

Proof. Differentiate the term on the second line of Equation A4 that is used to define m_-^* in Equation A5 and rearrange:

$$\frac{\partial m_-^*}{\partial n} = 1 + \frac{7Kn - 3n + K + 7Km_-^* + 9m_-^*}{5n^2 - 5Kn + 3n + 2K + 2 - 10m_-^*n - 2m_-^*K - 6m_-^*} \quad (\text{A6})$$

From the chain rule, the sign of $\frac{\partial(m_-^*/n)}{\partial n}$ is the same as the sign of $\frac{\partial m_-^*}{\partial n} - \frac{m_-^*}{n}$. Accordingly, to show that the latter is positive, it remains only to show that the fraction in Equation A6 is positive. Under Assumption Appendix A, the numerator is positive. Rearranging the denominator yields the following condition on m_-^* for the denominator to be positive:

$$m_-^* < \frac{5n^2 + 5Kn + 3n - 2K + 2}{2(K+5n+3)} \quad (\text{A7})$$

This is exactly the condition implied by Lemma 1 for m_-^* . Under Assumption Appendix A, m^* as specified by Equation A5 satisfies this restriction. This completes the proof. \square

This proposition corresponds to a “rush” to build at $t = 1$. Although demand will be higher at $t = 2$ (and a monopolist would choose to build at $t = 2$), firms believe that their competitors will build at $t = 1$. If their competitors build at $t = 1$, the remaining land will be more expensive and the demand will be lower at $t = 2$. Accordingly, firms shift production to $t = 1$ with positive probability. In equilibrium, these beliefs are self-fulfilling. While the model represents a significant abstraction from reality, this result captures the real-world rush to purchase land, build housing, and capture market share.

From Proposition 3, the following existence result follows directly:

Proposition 4. *For any number of firms $n > 1$ a mixed-strategy equilibrium characterized by $m_-^* \in (0, n - 1)$ exists.*

Proof. From Lemma 1 and 2, $\frac{m_-^*}{n}$ ranges from zero to $\frac{1}{2}$ in the large n limit. From Proposition 3, $\frac{m_-^*}{n}$ is continuously increasing in n . Therefore, by the intermediate value theorem, at any n the value of $\frac{m_-^*}{n}$ lies between zero and $\frac{1}{2}$ — i.e., $m^* \in (0, n - 1)$. \square

For the remainder of the discussion we will consider the equilibrium generated by belief m_-^* . For legibility we suppress the superscript and subscript and denote this belief by m . Imposing symmetry on Equation A3 yields the following construction decisions for each firm:

$$\begin{aligned} h_1^* &= \frac{K + 1}{(m + 2)(\alpha_1 + \beta_1)} \\ h_2^* &= \frac{m + 2K - 4}{(m + 2)(\alpha_1 + \beta_1)(n - m + 1)} \end{aligned} \tag{A8}$$

This implies that the equilibrium aggregate production of housing in each period is as follows:

$$\begin{aligned} H_1^* &= \frac{mn}{n - 1} \frac{K + 1}{(m + 2)(\alpha_1 + \beta_1)} \\ H_2^* &= \frac{n^2 - mn - n}{n - 1} \frac{m + 2K - 4}{(m + 2)(\alpha_1 + \beta_1)(n - m + 1)} \end{aligned} \tag{A9}$$

From Equation A9 we can derive an additional theoretical result:

Proposition 5. *The total volume built at $t = 1$ is increasing in n .*

Proof. Differentiate H_1 as specified in Equation A9 using $m' = \frac{\partial m}{\partial n}$ for notational clarity:

$$\frac{\partial H_1}{\partial n} = \frac{K + 1}{\alpha_1 + \beta_1} \frac{2n^2 m' - 2nm' - m^2 - 2m}{(m + 2)^2 (n - 1)^2} \tag{A10}$$

It remains to show that $2n^2 m' - 2nm' - m^2 - 2m$ is positive. To see this, note that Lemma 1 shows that $m' > 1$ and Lemma 2 and Proposition 4 show that $m \leq \frac{n}{2}$. From this, it

follows that $2n^2m' - 2nm' - m^2 - 2m \geq 2n(n-1)$ for $n > 1$. Since this term is positive, the expression on the right-hand side of Equation A10 is also positive. \square

According to Equation A8, the volume of construction by each firm at $t = 1$ is decreasing in n . However, according to Proposition 5, the rush to build shown in Proposition 3 is sufficiently large that increasing the number of firms increases the total volume of construction at $t = 1$. This result may seem unsurprising in light of Proposition 3 but it is worth emphasizing that this result would not arise in a marketplace of atomistic price-taking firms.

This discussion has focused on *ex ante* price and construction decisions. However, insofar as each firm is playing its mixed strategy independently, the *ex post* outcome varies with the realization of the n firms' mixed strategies. The following proposition demonstrates that an increase in the number of firms leads to a lower dispersion in *ex post* outcomes:

Proposition 6. *Assume m satisfies the restriction $\frac{2}{n^2+3} > \frac{m}{n(n-1)} > \frac{1}{n(n+1)}$. Then, the *ex post* price volatility at $t = 1$ is decreasing in n .*

Proof. Let $\text{SD}(p_1)$ denote the *ex post* standard deviation in the realization of p_1 . Since n firms are each building the quantity h_1 specified by Equation A8 with probability $\frac{m}{n-1}$ and given the price at $t = 1$ as specified by Equation A1, $\text{SD}(p_1)$ may be written in terms of m as follows:

$$\text{SD}(p_1) = \frac{\alpha_1(K+1)nm(n-m-1)}{\alpha_1 + \beta_1(n-1)(m+2)} \quad (\text{A11})$$

Differentiating Equation A11 with respect to n and rearranging yields the following result:

$$\text{sign}\left(\frac{\partial}{\partial n}\text{SD}(p_1)\right) = \text{sign}(n(n-1)m'(2n-mn-3m-2) + m(m+2)(mn-n+m+1)) \quad (\text{A12})$$

The term $(2n-mn-3m-2)$ is positive when $m < \frac{2n(n-1)}{n^2+3}$ and the term $(mn-n+m+1)$ is positive when $m > \frac{n(n-1)}{n(n+1)}$. \square

It is worth noting that the interval described by the two bounds in Proposition 6 is not empty. To see this, note that $\frac{2}{n^2+3} - \frac{1}{n^2+n} = \frac{(n+3)(n-1)}{n(n+1)(n^2+3)}$ which is positive for $n > 1$. Qualitatively, this proposition shows that the dispersion of prices decrease as more firms enter the market. The conditions in the proposition are sufficient, but not necessary. The upper bound on n excludes situations where the number of firms is so large that the market is close to the competitive limit and the dominant effect of an additional firm is the reduction in production by each firm. The lower bound on n excludes situations where the probability of any firm building at $t = 1$ is sufficiently low that the effective price is very close to $1 + \alpha_0$ and the volatility is very close to zero; any marginal increase in competition would raise the volatility.

Appendix B Details on the Instrument

To explicitly define the instrument, let C_{mtj} be activity of firm j at period t in market m . Also, let J_{mt}^N be the set of national firms active at period t in market m (i.e., the set of national firms with nonzero closings in this market and this year). Then, define \hat{C}_{mtj} as the predicted activity by firm j at period t in market m where the prediction comes from the activities of firm j in all markets other than m :

$$\hat{C}_{mtj} = \frac{\sum_{m' \neq m} C_{m'tj}}{\sum_{m' \neq m} C_{m',t-1,j}} C_{m,t-1,j} \quad (\text{A1})$$

Next, for each market, define the market-weighted average over all national firms \bar{C}_{mt} :

$$\bar{C}_{mt} = \frac{\sum_{j \in J_{mt}^N} C_{mt,j-1} \hat{C}_{mtj}}{\sum_{j \in J_{mt}^N} C_{mt,j-1}} \quad (\text{A2})$$

Finally, to obtain an instrument for the number of firms accounting for 90% of production, normalize by the previous year's total construction by all national firms:

$$Z_{mt} = \frac{\bar{C}_{mt}}{\sum_{j \in J_{mt}^N} C_{mt,j-1}} \quad (\text{A3})$$

We use Z_{mt} as an instrument for competitive intensity.

Appendix C Robustness Tests

We conduct several tests of robustness to ensure the validity of these empirical results:

1. To address the possibility that concentration in each market year pair is capturing only the particular composition of firms that operate at different scales, we include controls for the share of production by national, regional, and micro-sized homebuilding firms in the market (local is the base category we leave out). Similarly, to take into account the specific unit type portfolio, we also include indicators for the share of residential units in the market that are single-family (attached/multi-family is the base category we leave out). Appendix [Appendix C.1](#) contains regression results with these additional controls.
2. To address the possibility that the dynamics of new housing development are different in markets where most new housing is produced through redevelopment and in markets where housing is built on previously undeveloped land, we include a measure of how *established* the market is. Specifically, we include an indicator variable for whether a market's resale share of total sales falls into the top tercile of all markets in that year. Appendix [Appendix C.2](#) contains regression results generated with this additional control.
3. To ensure that our results are not driven solely by concentration in markets which may be smaller than the geographic extent of a typical homebuyer's search, we repeat the analysis excluding any market with fewer than forty thousand residents ([U.S. Census Bureau, 2015a](#)). These excluded markets comprise 30.1% of all observations. Appendix [Appendix C.3](#) contains regression results generated with this restricted sample.
4. Similarly, to ensure that our results are not driven by apparent high concentration in markets with very low volume, we repeat the analysis excluding all market-year pairs with production in the lowest decile of nonzero housing production across all markets in each year. Appendix [Appendix C.4](#) contains regression results generated with this restricted sample.
5. As defined in Equation [A1](#), the instrumental variable uses the predicted activity of national firms in market m based on their activity in all markets $-m \neq m$. To account for the possibility that firms' activity is correlated across nearby markets, we also construct the instrument excluding not only the focal market m but also all other markets spatially adjacent to m . Appendix [Appendix C.5](#) contains regression results generated with this alternate instrument.
6. As described in Section [3.1](#) we use places as our definition of markets. To test whether this definition is reasonable we calculate the competitive intensity in the ring of zipcodes spatially adjacent to each market and we include this competitive intensity measure as an additional control (instrumented as described in Section [3.2.2](#)). Appendix [Appendix C.6](#) contains regression results generated with these additional controls.

Table C1: SUMMARY STATISTICS FOR THE TESTS OF ROBUSTNESS. THE UNIT OF OBSERVATION IN THIS TABLE IS A MARKET-YEAR TUPLE.

	N	Median	Mean	Std. Dev.	Min.	Max.
National firm share	1600	0.13	0.21	0.23	0	1
Regional firm share	1600	0.10	0.15	0.18	0	1
Micro firm share	1600	0.50	0.52	0.30	0	1
Share of single family units	1581	0.44	0.47	0.33	0	1
Established markets	1597	0.00	0.45	0.50	0	1
Share of resales	1597	0.91	0.88	0.09	0.47	1.00
Observations	1600					

Table C1 contains summary statistics for the additional variables in these robustness checks. Under each of these alternative specifications, the magnitude and significance of our empirical results remain unchanged.

As discussed in Section 4.2, we are able to construct our instrumental variable only in situations where large national firms are active. Therefore, our results exclude markets where large national firms are inactive. To demonstrate the impact of this change, Section Appendix C.7 compares OLS results including the set of markets with no national firms to our baseline OLS and IV results. As shown, with the exception of price volatility, all results remain largely unchanged in magnitude and statistical significance. In the price volatility regression our result is unchanged in sign but decreases in magnitude and statistical significance.

As an additional check on the power of our result in a context with many fixed effects, we randomly reassign the values of the instrument across observations one thousand times as a placebo test. Under this random shuffling, our results should no longer hold. Appendix Appendix C.8 contains the results for these placebo tests for the impact on the different dependent variables. As shown, this “placebo” instrument generates a significant effect of concentration (at $p < 0.05$) in 1.6% to 9.8% of all iterations across the various dependent variables with a significant effect in 4.54% of the random shuffling trials across all dependent variables. This provides additional confidence that our instrument has adequate power.

Appendix C.1 Results controlling for type of builders and type of units

Table C2: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE VOLUME OF HOUSING SUPPLIED.

	Total Value				Total Sq Feet				Units Sold			
	OLS	IV	OLS	IV	OLS	IV	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.17*** (0.043)	1.07*** (0.34)	0.21*** (0.041)	0.89*** (0.25)	0.16*** (0.042)	1.11*** (0.34)	0.20*** (0.039)	0.93*** (0.25)	0.087** (0.043)	0.80** (0.32)	0.17*** (0.040)	0.66*** (0.23)
Jobs within 50 miles	-3.02** (1.42)	2.15 (2.60)	-2.34* (1.40)	3.45 (2.63)	-2.54* (1.37)	2.87 (2.58)	-2.06 (1.36)	4.08 (2.61)	-1.09 (1.44)	2.96 (2.45)	0.28 (1.37)	4.39* (2.42)
Share national firms	0.22 (0.27)	0.22 (0.33)			0.14 (0.26)	0.14 (0.32)			0.037 (0.27)	0.042 (0.31)		
Share regional firms	0.20 (0.30)	0.37 (0.37)			-0.093 (0.30)	0.077 (0.38)			-0.077 (0.31)	0.061 (0.35)		
Share micro firms	0.16 (0.24)	-0.90* (0.49)			0.11 (0.23)	-1.00** (0.49)			-0.046 (0.24)	-0.88* (0.47)		
Share of single family			-0.47*** (0.11)	-0.90*** (0.20)			-0.39*** (0.10)	-0.85*** (0.20)			-0.98*** (0.11)	-1.28*** (0.18)
Construction cost	-0.43*** (0.089)	-0.47*** (0.11)	-0.46*** (0.088)	-0.48*** (0.10)	-0.32*** (0.087)	-0.36*** (0.11)	-0.35*** (0.085)	-0.37*** (0.100)	-0.32*** (0.091)	-0.35*** (0.10)	-0.37*** (0.086)	-0.38*** (0.093)
Observations	927	927	927	927	925	925	925	925	927	927	927	927
R ²	0.572		0.581		0.498		0.504		0.530		0.570	
1 st Stage F		18.694		28.213		18.666		28.114		18.694		28.213
1 st Stage p-value		0.000		0.000		0.000		0.000		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C3: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE PIPELINE OF HOUSING PRODUCTION.

	In pipeline				Ready for sale				Active subdivisions			
	OLS	IV	OLS	IV	OLS	IV	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.17*** (0.020)	0.39*** (0.11)	0.20*** (0.020)	0.40*** (0.099)	0.47*** (0.098)	3.17*** (0.75)	0.58*** (0.091)	2.77*** (0.58)	0.44*** (0.035)	1.69*** (0.31)	0.45*** (0.033)	1.49*** (0.24)
Jobs within 50 miles	-6.87*** (1.16)	-6.79*** (1.26)	-7.07*** (1.15)	-6.16*** (1.31)	-13.4** (5.55)	-10.9 (8.21)	-12.0** (5.28)	-1.22 (7.75)	0.99 (1.99)	1.45 (3.37)	2.35 (1.93)	7.16** (3.20)
Share national firms	0.35*** (0.11)	0.33*** (0.12)			0.96* (0.53)	0.38 (0.80)			0.37** (0.18)	0.24 (0.31)		
Share regional firms	0.33*** (0.13)	0.29** (0.14)			1.10* (0.62)	0.32 (0.93)			0.41* (0.22)	0.17 (0.37)		
Share micro firms	0.40*** (0.098)	0.18 (0.15)			0.91* (0.49)	-2.00* (1.07)			0.10 (0.17)	-1.14*** (0.42)		
Share of single family			-0.12*** (0.047)	-0.20*** (0.062)			-1.47*** (0.22)	-2.26*** (0.37)			-0.34*** (0.079)	-0.74*** (0.15)
Construction cost	4.28*** (0.31)	4.72*** (0.41)	4.37*** (0.31)	4.64*** (0.35)	-0.32 (1.49)	5.68** (2.74)	-0.25 (1.41)	3.16 (2.13)	3.67*** (0.52)	6.13*** (1.06)	3.51*** (0.50)	4.92*** (0.84)
Observations	690	690	690	690	651	651	651	651	688	688	688	688
R ²	0.651		0.646		0.166		0.214		0.383		0.393	
1 st Stage F		21.488		27.262		20.279		26.174		21.454		27.472
1 st Stage p-value		0.000		0.000		0.000		0.000		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C4: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON PRICE AND PRODUCTION VOLATILITY.

	Price volatility				Production volatility			
	OLS	IV	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	-0.27** (0.11)	-4.17*** (1.10)	-0.26** (0.10)	-3.30*** (0.78)	0.74*** (0.12)	4.43*** (1.03)	0.79*** (0.12)	3.70*** (0.79)
Jobs within 50 miles	-8.78** (3.57)	-31.0*** (8.33)	-9.69*** (3.60)	-35.4*** (8.17)	1.35 (6.99)	4.50 (10.8)	6.66 (6.75)	20.8** (10.1)
Share national firms	-0.48 (0.68)	-0.48 (1.05)			0.37 (0.65)	-0.36 (1.02)		
Share regional firms	1.83** (0.77)	1.13 (1.22)			1.68** (0.77)	0.67 (1.22)		
Share micro firms	0.75 (0.61)	5.35*** (1.60)			-0.14 (0.59)	-3.95*** (1.39)		
Share of single family			0.28 (0.28)	2.20*** (0.62)			-1.61*** (0.28)	-2.69*** (0.49)
Construction cost	-0.59*** (0.23)	-0.43 (0.35)	-0.49** (0.23)	-0.43 (0.31)	-15.0*** (1.89)	-7.18** (3.61)	-15.1*** (1.81)	-10.8*** (2.77)
Observations	924	924	924	924	658	658	658	658
R ²	0.110		0.094		0.309		0.332	
1 st Stage F		18.666		28.114		18.773		24.132
1 st Stage p-value		0.000		0.000		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Appendix C.2 Results controlling for established markets

Table C5: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE VOLUME OF HOUSING SUPPLIED.

	Total Value				Total Sq Feet				Units Sold			
	OLS	IV	OLS	IV	OLS	IV	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.19*** (0.039)	0.99*** (0.27)	0.18*** (0.041)	0.90*** (0.26)	0.20*** (0.037)	1.04*** (0.26)	0.18*** (0.039)	0.94*** (0.26)	0.12*** (0.038)	0.75*** (0.24)	0.095** (0.041)	0.63** (0.25)
Jobs within 50 miles	-5.91*** (1.40)	0.51 (2.69)	-2.70* (1.43)	3.40 (2.75)	-5.72*** (1.34)	1.03 (2.66)	-2.37* (1.39)	4.06 (2.72)	-4.84*** (1.36)	0.22 (2.47)	-0.76 (1.45)	3.84 (2.62)
Established Market	-0.41*** (0.042)	-0.44*** (0.052)			-0.43*** (0.040)	-0.47*** (0.052)			-0.54*** (0.041)	-0.57*** (0.048)		
Share of resales			0.054 (0.037)	0.087* (0.044)			0.049 (0.036)	0.084* (0.044)			0.018 (0.038)	0.043 (0.042)
Construction cost	-0.31*** (0.086)	-0.31*** (0.10)	-0.41*** (0.091)	-0.41*** (0.11)	-0.19** (0.082)	-0.19* (0.10)	-0.31*** (0.088)	-0.30*** (0.10)	-0.16* (0.083)	-0.16 (0.095)	-0.32*** (0.092)	-0.31*** (0.10)
Observations	916	916	916	916	914	914	914	914	916	916	916	916
R ²	0.612		0.573		0.551		0.497		0.606		0.531	
1 st Stage F		25.233		26.154		25.108		26.057		25.233		26.154
1 st Stage p-value		0.000		0.000		0.000		0.000		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C6: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE PIPELINE OF HOUSING PRODUCTION.

	In pipeline		Ready for sale		Active subdivisions							
	OLS	IV	OLS	IV	OLS	IV	OLS	IV				
Firms producing 90%	0.18*** (0.019)	0.39*** (0.10)	0.19*** (0.020)	0.41*** (0.10)	0.44*** (0.090)	2.77*** (0.62)	0.50*** (0.092)	2.86*** (0.63)	0.41*** (0.032)	1.49*** (0.26)	0.41*** (0.032)	1.51*** (0.26)
Jobs within 50 miles	-7.13*** (1.14)	-6.28*** (1.30)	-7.37*** (1.16)	-6.45*** (1.33)	-11.9** (5.24)	-1.51 (7.95)	-10.2* (5.43)	1.05 (8.23)	2.32 (1.90)	6.73** (3.25)		7.04** (3.32)
Established Market	-0.090*** (0.023)	-0.072*** (0.027)			-0.83*** (0.11)	-0.61*** (0.17)			-0.26*** (0.039)	-0.16** (0.067)	-0.25*** (0.039)	
Share of resales			0.018 (0.026)	0.022 (0.028)			-0.61*** (0.14)	-0.65*** (0.20)			-0.10** (0.043)	-0.12* (0.071)
Construction cost	4.36*** (0.31)	4.66*** (0.36)	4.44*** (0.31)	4.73*** (0.36)	-1.06 (1.42)	2.85 (2.27)	0.69 (1.47)	4.51* (2.30)	3.29*** (0.50)	4.89*** (0.89)	3.50*** (0.50)	5.21*** (0.89)
Observations	686	686	686	686	647	647	647	647	684	684	684	684
R ²	0.652		0.645		0.229		0.185		0.413		0.417	
1 st Stage F		24.699		25.351		23.643		24.408		24.887		25.557
1 st Stage p-value		0.000		0.000		0.000		0.000		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C7: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON PRICE AND PRODUCTION VOLATILITY.

	Price volatility				Production volatility			
	OLS	IV	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	-0.24** (0.10)	-3.47*** (0.84)	-0.24** (0.10)	-3.38*** (0.81)	0.65*** (0.12)	3.75*** (0.85)	0.69*** (0.12)	3.82*** (0.85)
Jobs within 50 miles	-8.53** (3.72)	-34.3*** (8.51)	-9.40*** (3.64)	-36.0*** (8.55)	5.67 (6.80)	19.1* (10.4)	5.60 (6.97)	19.9* (10.7)
Established Market	0.072 (0.11)	0.23 (0.17)			-0.68*** (0.14)	-0.44** (0.21)		
Share of resales			-0.098 (0.094)	-0.24* (0.14)			-0.22 (0.18)	-0.28 (0.26)
Construction cost	-0.53** (0.23)	-0.53 (0.33)	-0.56** (0.23)	-0.58* (0.33)	-15.6*** (1.85)	-10.7*** (2.97)	-14.6*** (1.89)	-9.79*** (3.00)
Observations	913	913	913	913	655	655	655	655
R ²	0.097		0.097		0.321		0.298	
1 st Stage F		25.108		26.057		22.001		22.572
1 st Stage p-value		0.000		0.000		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Appendix C.3 Results without low-population markets

Table C8: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE VOLUME OF HOUSING SUPPLIED. MARKETS WITH POPULATION OF AT LEAST 40,000.

	Total Value		Total Sq Feet		Units Sold	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.15*** (0.050)	0.75*** (0.28)	0.15*** (0.047)	0.82*** (0.28)	0.065 (0.050)	0.59** (0.28)
Jobs within 50 miles	-5.01*** (1.70)	0.58 (3.22)	-4.32*** (1.62)	1.87 (3.20)	-2.41 (1.70)	2.45 (3.14)
Construction cost	-0.48*** (0.10)	-0.44*** (0.12)	-0.36*** (0.099)	-0.32*** (0.12)	-0.33*** (0.10)	-0.29** (0.12)
Observations	927	927	925	925	927	927
R ²	0.634		0.567		0.612	
1 st Stage F	17.646		17.593		17.646	
1 st Stage p-value	0.000		0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C9: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE PIPELINE OF HOUSING PRODUCTION. MARKETS WITH POPULATION OF AT LEAST 40,000.

	In pipeline		Ready for sale		Active subdivisions	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.22*** (0.024)	0.44*** (0.11)	0.52*** (0.13)	2.76*** (0.71)	0.50*** (0.047)	1.54*** (0.30)
Jobs within 50 miles	-8.38*** (1.36)	-7.38*** (1.59)	-16.8** (7.21)	-5.98 (10.4)	2.02 (2.66)	6.76 (4.29)
Construction cost	4.21*** (0.36)	4.63*** (0.44)	-0.96 (1.87)	3.36 (2.88)	3.82*** (0.67)	5.79*** (1.16)
Observations	690	690	651	651	688	688
R ²	0.748		0.206		0.433	
1 st Stage F	18.005		18.388		17.977	
1 st Stage p-value	0.000		0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C10: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON PRICE AND PRODUCTION VOLATILITY. MARKETS WITH POPULATION OF AT LEAST 40,000.

	Price volatility		Production volatility	
	OLS	IV	OLS	IV
Firms producing 90%	-0.30** (0.14)	-3.87*** (1.06)	0.84*** (0.16)	4.12*** (1.03)
Jobs within 50 miles	-10.4** (4.73)	-43.4*** (12.0)	3.93 (9.28)	19.0 (14.3)
Construction cost	-0.76*** (0.29)	-1.00** (0.45)	-17.2*** (2.42)	-10.9*** (4.01)
Observations	924	924	658	658
R ²	0.139		0.374	
1 st Stage F	17.593		16.620	
1 st Stage p-value	0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Appendix C.4 Results without low-production markets

Table C11: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE VOLUME OF HOUSING SUPPLIED. MARKETS WITH VOLUME LARGER THAN THE LOWEST DECILE EACH YEAR.

	Total Value		Total Sq Feet		Units Sold	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.17*** (0.039)	0.90*** (0.26)	0.17*** (0.038)	0.95*** (0.26)	0.076* (0.039)	0.62** (0.25)
Jobs within 50 miles	-3.41** (1.38)	2.86 (2.74)	-3.04** (1.33)	3.65 (2.72)	-1.39 (1.38)	3.32 (2.57)
Construction cost	-0.42*** (0.085)	-0.44*** (0.10)	-0.31*** (0.083)	-0.33*** (0.10)	-0.31*** (0.085)	-0.32*** (0.094)
Observations	927	927	925	925	927	927
R ²	0.599		0.526		0.565	
1 st Stage F		25.027		24.936		25.027
1 st Stage p-value		0.000		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C12: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE PIPELINE OF HOUSING PRODUCTION. MARKETS WITH VOLUME LARGER THAN THE LOWEST DECILE EACH YEAR.

	In pipeline		Ready for sale		Active subdivisions	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.18*** (0.019)	0.38*** (0.10)	0.48*** (0.094)	2.88*** (0.65)	0.43*** (0.034)	1.54*** (0.26)
Jobs within 50 miles	-7.57*** (1.13)	-6.60*** (1.31)	-14.4*** (5.47)	-2.47 (8.39)	2.01 (1.97)	7.34** (3.41)
Construction cost	4.51*** (0.30)	4.78*** (0.35)	-0.030 (1.47)	3.74 (2.32)	3.58*** (0.51)	5.09*** (0.90)
Observations	690	690	651	651	688	688
R ²	0.657		0.167		0.382	
1 st Stage F	24.839		23.473		25.032	
1 st Stage p-value	0.000		0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C13: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON PRICE AND PRODUCTION VOLATILITY. IMPACT OF COMPETITION ON PRICE VOLATILITY. MARKETS WITH VOLUME LARGER THAN THE LOWEST DECILE EACH YEAR.

	Price volatility		Production volatility	
	OLS	IV	OLS	IV
Firms producing 90%	-0.23** (0.10)	-3.50*** (0.85)	0.70*** (0.12)	3.83*** (0.85)
Jobs within 50 miles	-8.54** (3.66)	-36.5*** (8.92)	4.84 (6.98)	20.1* (10.8)
Construction cost	-0.53** (0.23)	-0.45 (0.33)	-14.9*** (1.88)	-10.2*** (2.97)
Observations	924	924	658	658
R ²	0.097		0.300	
1 st Stage F	24.936		22.863	
1 st Stage p-value	0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Appendix C.5 Results with adjacent markets removed from the instrument

Table C14: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE VOLUME OF HOUSING SUPPLIED. INSTRUMENT CALCULATED WITHOUT ADJACENT MARKETS.

	Total Value		Total Sq Feet		Units Sold	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.18*** (0.041)	0.84*** (0.24)	0.17*** (0.040)	0.89*** (0.24)	0.091** (0.041)	0.59** (0.23)
Jobs within 50 miles	-2.88** (1.43)	2.67 (2.57)	-2.54* (1.38)	3.37 (2.54)	-0.81 (1.44)	3.32 (2.46)
Construction cost	-0.45*** (0.089)	-0.45*** (0.10)	-0.34*** (0.086)	-0.34*** (0.10)	-0.33*** (0.090)	-0.34*** (0.097)
Observations	913	913	911	911	913	913
R ²	0.570		0.494		0.530	
1 st Stage F	29.656		29.534		29.656	
1 st Stage p-value	0.000		0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C15: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE PIPELINE OF HOUSING PRODUCTION. INSTRUMENT CALCULATED WITHOUT ADJACENT MARKETS.

	In pipeline		Ready for sale		Active subdivisions	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.19*** (0.020)	0.35*** (0.099)	0.52*** (0.095)	2.24*** (0.55)	0.44*** (0.034)	1.46*** (0.25)
Jobs within 50 miles	-7.24*** (1.15)	-6.55*** (1.28)	-13.1** (5.47)	-4.60 (7.23)	2.07 (1.96)	6.64** (3.19)
Construction cost	4.49*** (0.31)	4.72*** (0.35)	-0.019 (1.48)	2.91 (2.04)	3.65*** (0.51)	5.16*** (0.86)
Observations	683	683	644	644	681	681
R ²	0.646		0.164		0.382	
1 st Stage F	25.580		24.916		25.693	
1 st Stage p-value	0.000		0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C16: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON PRICE AND PRODUCTION VOLATILITY. INSTRUMENT CALCULATED WITHOUT ADJACENT MARKETS.

	Price volatility		Production volatility	
	OLS	IV	OLS	IV
Firms producing 90%	-0.23** (0.10)	-2.37*** (0.66)	0.68*** (0.12)	3.28*** (0.79)
Jobs within 50 miles	-9.06** (3.63)	-26.9*** (6.94)	4.37 (6.93)	16.6* (9.79)
Construction cost	-0.50** (0.23)	-0.49* (0.27)	-15.0*** (1.88)	-10.8*** (2.76)
Observations	910	910	652	652
R ²	0.097		0.296	
1 st Stage F	29.534		22.570	
1 st Stage p-value	0.000		0.000	

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Appendix C.6 Results controlling for concentration in surrounding zipcodes

Table C17: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE VOLUME OF HOUSING SUPPLIED. INCLUDES CONCENTRATION IN SURROUNDING RING OF ZIPCODES.

	Total Value		Total Sq Feet		Units Sold	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.17*** (0.042)	0.89*** (0.32)	0.16*** (0.041)	0.93*** (0.32)	0.060 (0.043)	0.65** (0.31)
Firms producing 90% in ring	0.098* (0.051)	0.45 (1.30)	0.12** (0.049)	0.51 (1.29)	0.17*** (0.052)	0.59 (1.26)
Jobs within 50 miles	-2.61* (1.48)	5.39 (7.28)	-1.90 (1.42)	6.61 (7.22)	-0.028 (1.49)	7.35 (7.08)
Construction cost	-0.48*** (0.092)	-0.49*** (0.12)	-0.36*** (0.088)	-0.38*** (0.12)	-0.35*** (0.093)	-0.36*** (0.12)
Observations	927	927	925	925	927	927
R ²	0.580	0.381	0.509	0.223	0.541	0.371
1 st Stage F		14.554		14.498		14.554
1 st Stage p-value		0.000		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C18: IMPACT OF COMPETITION ON OVERSUPPLY. INCLUDES CONCENTRATION IN SURROUNDING RING OF ZIPCODES.

	In pipeline		Ready for sale		Active subdivisions	
	OLS	IV	OLS	IV	OLS	IV
Firms producing 90%	0.19*** (0.018)	0.50*** (0.14)	0.48*** (0.096)	3.15*** (0.86)	0.43*** (0.034)	1.66*** (0.33)
Firms producing 90% in ring	0.040* (0.023)	-0.54 (0.67)	0.17 (0.12)	-3.38 (5.10)	0.012 (0.044)	-1.26 (1.69)
Jobs within 50 miles	-7.94*** (1.06)	-10.8** (4.97)	-13.5** (5.59)	-27.2 (37.6)	1.66 (2.02)	-2.18 (12.5)
Construction cost	3.87*** (0.29)	3.93*** (0.63)	-0.53 (1.52)	1.09 (4.75)	3.59*** (0.53)	4.60*** (1.52)
Observations	690	690	651	651	688	688
R ²	0.688	0.310	0.167	-1.649	0.383	-1.300
1 st Stage F		12.442		12.098		12.519
1 st Stage p-value		0.000		0.000		0.000

Standard errors in parentheses

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C19: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON PRICE AND PRODUCTION VOLATILITY. INCLUDES CONCENTRATION IN SURROUNDING RING OF ZIP-CODES.

	Price volatility		Production volatility	
	OLS	IV	OLS	IV
Firms producing 90%	-0.23** (0.11)	-3.85*** (1.07)	0.72*** (0.12)	4.50*** (1.26)
Firms producing 90% in ring	-0.0060 (0.13)	2.76 (4.31)	-0.21 (0.15)	-5.48 (6.20)
Jobs within 50 miles	-9.46** (3.81)	-20.5 (24.2)	1.14 (7.01)	-20.4 (45.3)
Construction cost	-0.49** (0.24)	-0.55 (0.40)	-16.9*** (1.92)	-15.0** (6.01)
Observations	924	924	658	658
R ²	0.093	-1.242	0.320	-1.651
1 st Stage F		14.498		11.062
1 st Stage p-value		0.000		0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Appendix C.7 Comparing OLS and IV results

Table C20: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE VOLUME OF HOUSING SUPPLIED. INCLUDES COMPARISON TO OLS RESULTS WITH ALL MARKETS.

	Total Value			Total Sq Feet			Units Sold		
	OLS	OLS	IV	OLS	OLS	IV	OLS	OLS	IV
Firms producing 90%	0.34*** (0.036)	0.17*** (0.040)	0.87*** (0.25)	0.28*** (0.036)	0.17*** (0.039)	0.91*** (0.25)	0.23*** (0.037)	0.082** (0.040)	0.62*** (0.24)
Jobs within 50 miles	-6.29*** (1.35)	-2.97** (1.41)	2.71 (2.58)	-5.20*** (1.32)	-2.58* (1.37)	3.38 (2.55)	-4.66*** (1.36)	-1.04 (1.43)	3.33 (2.46)
Construction cost	-0.22*** (0.075)	-0.44*** (0.089)	-0.43*** (0.10)	-0.19*** (0.073)	-0.33*** (0.086)	-0.32*** (0.10)	-0.14* (0.075)	-0.32*** (0.090)	-0.32*** (0.098)
Observations	1580	927	927	1546	925	925	1581	927	927
R ²	0.487	0.572		0.410	0.497		0.441	0.530	
1 st Stage F			27.483			27.390			27.483
1 st Stage p-value			0.000			0.000			0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C21: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON THE PIPELINE OF HOUSING PRODUCTION. INCLUDES COMPARISON TO OLS RESULTS WITH ALL MARKETS.

	In pipeline			Ready for sale			Active subdivisions		
	OLS	OLS	IV	OLS	OLS	IV	OLS	OLS	IV
Firms producing 90%	0.16*** (0.026)	0.19*** (0.020)	0.40*** (0.10)	0.43*** (0.081)	0.49*** (0.093)	2.88*** (0.63)	0.32*** (0.029)	0.42*** (0.033)	1.51*** (0.26)
Jobs within 50 miles	-13.4*** (1.56)	-7.24*** (1.15)	-6.33*** (1.32)	-21.3*** (4.83)	-13.5** (5.44)	-2.32 (8.23)	-3.33* (1.77)	1.91 (1.96)	6.54** (3.31)
Construction cost	4.23*** (0.40)	4.38*** (0.31)	4.68*** (0.36)	0.82 (1.25)	-0.12 (1.46)	3.76 (2.30)	2.91*** (0.45)	3.54*** (0.51)	5.09*** (0.89)
Observations	1078	690	690	921	651	651	1038	688	688
R ²	0.481	0.642		0.181	0.161		0.258	0.376	
1 st Stage F			25.725			24.683			25.924
1 st Stage p-value			0.000			0.000			0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table C22: REGRESSION RESULTS FOR THE IMPACT OF COMPETITION ON PRICE AND PRODUCTION VOLATILITY.

	Price volatility			Production volatility		
	OLS	OLS	IV	OLS	OLS	IV
Firms producing 90%	-0.075 (0.074)	-0.23** (0.10)	-3.24*** (0.78)	0.43*** (0.096)	0.68*** (0.12)	3.84*** (0.86)
Jobs within 50 miles	-5.07* (2.78)	-9.32*** (3.58)	-33.5*** (7.92)	10.6* (5.87)	4.37 (6.90)	18.4* (10.6)
Construction cost	-0.28 (0.18)	-0.50** (0.23)	-0.54* (0.32)	-11.1*** (1.52)	-14.9*** (1.86)	-9.98*** (2.98)
Observations	1392	924	924	880	658	658
R ²	0.047	0.093		0.244	0.298	
1 st Stage F			27.390			22.603
1 st Stage p-value			0.000			0.000

Standard errors in parentheses.

All specifications include market and year fixed effects.

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Appendix C.8 Placebo tests

Table C23: PLACEBO TEST

Dependent variable	% iterations $p < 0.05$
Total value	3.0%
Square footage	2.3%
Units	1.6%
In pipeline	5.0%
Ready for sale	3.8%
Active subdivisions	9.8%
Price volatility	3.5%
Price volatility	7.3%

Notes: Results of placebo test for statistical significance of outcome variable under random reassignment of instrument values. Results generated from one thousand random reassignments of instrument across market-year pairs.

Appendix D Construction of counterfactual

We adopt the following process to infer competitive intensity for the rest of the country using the Zipcode Business Patterns data set ([U.S. Census Bureau, 2015b](#)) which provides information on zipcode-level employment in residential construction for 2012 through 2015:

1. We aggregate Zipcode Business Patterns data to the markets in our sample using GIS software.
2. We generate a measure of the implied concentration in the Zipcode Business Patterns data by assuming that production increases linearly with the number of employees.
3. For the subsample of years and markets for which we have Metrostudy data we estimate a mapping from the implied concentration from Zipcode Business Patterns to the measured concentration from Metrostudy using a flexible polynomial specification.
4. We use the mapping generated in Steps 2 and 3 to predict the level of competitive intensity in 2015 for all markets in the United States.
5. For the markets in the Metrostudy data, we estimate a mapping between 2006 and 2015 level of concentration using a flexible polynomial specification.
6. We use the result of Step 4 and mapping generated in Step 5 to predict the level of competitive intensity in 2006 for all markets in the United States.
7. For each outcome variable we use the coefficients in the second column of the tables presented above to estimate the impact of changes in competitive intensity under a counterfactual scenario market competitive intensity in 2015 held at 2006 levels.



Outlook

[EXTERNAL] Fwd: SAY NO - Monitor Point FAILS 32BJ SEIU MEMBERS and BROOKLYN WORKING CLASS FAMILIES LONGTERM

From Marissa Bohk <[REDACTED]>**Date** Fri 5/29/2026 2:06 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

1 attachment (1 MB)

HomeBuildingMonopolies 2023Study.pdf;

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Dear District 33 Councilmember Lincoln Restler and the Land Use Committee team,

I'm writing to express my overwhelming *rejection and abject horror* at this ULURP re zoning proposal.

To begin, I am a born and raised New Yorker, so is my mom, so is my dad, so were my granparents. The Monitor Point trojan horse is exactly why I will likely have to leave this state altogether, my home state, as it's impossible for ANYONE my age, Gen Z, even Millennials and Gen X, and especially subsequent generations still growing up to afford to raise our own families here. Why?? **Because of Home-building monopolies like Monitor Point** gentrifying communities, raising prices on not only rent but property taxes for our local homeowners, groceries, bankrupting more affordable options and local ownership altogether! **Bye bye local book shops, art supply stores, toy stores, cinemas and elderly community centers, hello designer coffee shops and niche luxury retail; say hello to designer doggy day care and bye bye FOREVER your local preschools and after school programs! ONCE LOCAL OWNERSHIP LEAVES COMMUNITIES, STATISTICALLY IT NEVER COMES BACK!!!!!!! The "investment" into Greenpoint as a result of the Monitor Point Monstrosity will NOT GO BACK INTO OUR COMMUNITY, IT WILL CREATE MORE MONEY FOR THE CEO'S OF WHOLE FOODS AND STARBUCKS.**

Yet, Gotham developers know this yet pay lip service to OUR Working Class interests. The 32BJ SEIU Union workers may get temporary job security, but how many more jobs will the new 3,000 multi millionaire neighbors bring to these working class families? I believe **Monitor Point will create just 13 permanenent jobs**. THIS is the truth Gotham won't tell us, the truth immigrant families working 50+ hours a week don't have time to educate themselves on. This manipulation by greedy Gotham

leads Union Workers and desperate members of our community to prioritize short-term jobs and development---as they are--and that's a grave, grave error.

Moreover, let's talk about **this "deep" affordability plan**. You mean a "lottery" that serves ONE PURPOSE - **TAX CUTS FOR GOTHAM! Plus, 40% Affordable is NOT ENOUGH!!** A lottery that statistically continues to push out the most desperately in need of housing for the most ideal candidates IS NOT deeply affordable for anyone but the top 1%. How many more skyscrapers will it take to solve the housing crisis? (You can see that fallacy here.) How many units in the luxury Domino 1 building sit vacant? Half? I have personally never seen more than 30% of the lights on at any given time, and that's true for almost every sky scraper on the Brooklyn shoreline. And what about the housing lottery for middle class folks? Once again, conveniently ignored by Gotham as they make juuuust too much to ever be considered for the affordable housing they also often need! Income thresholds are intentionally skewed and manipulated to punish all non-multi-millionaire applicants, so once again I am confused how this is even being pushed as affordable or permanent housing for working families long-term.... on a floodplane.

Members of this community are being manipulated, painted as "NIMBYs" by Rockefeller Foundation funded "non profits" who have 0 interest in our community, all because we don't want to see or pay for our historic working class neighborhood to be bankrolled by shady developers with a history of horrific violations to build segregated, unnecessary infrastructure that rejects climate science and will likely be underwater in 100 years or less. **ALSO, THE POOR BUILDING IS NOT FLOOD PROTECTED WHATSOEVER; no podium, just directly onto the floodzone!!** At what point does the community supersede the successful lobbying of Billionaire corporations? Why is this being sold as our only option?? **We CAN "unlock" more affordable housing AND the Bushwick Inlet Park, just NOT with Gotham!!!!** Anyone who can look long term sees how INNECESARY AND EXCESSIVE this plan is.

Councilmember Restler, a NO is a vote for the working class, for the environment, for the future, for our children-- whom deserve a voice and home too-- and most importantly sends a message to the billionaires trying to buy our city and resident, pushing out the generations of immigrants who built it. Your NO shows District 33 residents that our communities actually do have a voice in local politics.

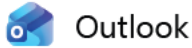
Furthermore, union workers need jobs that don't push them out of their own communities, and union leadership that doesn't sell them out. The high-skilled and essential labor of each and every 32BJ SEIU member deserve guaranteed work that aids their communities by building housing for workers like them, and creating MORE THAN 13 PERMAMENT JOBS!! It's a 1 in 1000000 chance to live in the poor people's building of the Monitor Point climate collapse ticking time-bomb. Not to mention the ripple effect of further community displacement and the further lack of unionized jobs, because union busting is ALWAYS done by multi-billion dollar conglomerates like Gotham, behind the scenes!
CALL THEM OUT! VOTE NO!

THANK YOU, Councilmember Lincoln Restler for your continued advocacy for our community's needs!

Concerned constituent of District 33's Community Board 1,

With love and deep concern,

Marissa Bohk



[EXTERNAL] Opposition to Monitor Point Rezoning

From ME [REDACTED] >

Date Wed 5/27/2026 12:20 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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I currently live at [REDACTED] (1 block from the proposed site) in Greenpoint and I am writing to you to express my opposition and major concerns about the proposed luxury high rise tower known as Monitor Point. I have been a resident of NYC for over 23 years and I have been a NYC public school elementary teacher for the same amount of time. I have lived in Williamsburg and Greenpoint along the waterfront for almost 13 years and I am concerned about the continued building of luxury towers that push out long term residents because they lack affordable options or reasonable housing options (for example, the number of studios being provided verse other housing options geared toward older residents and families who need more space- at an affordable price). I am also concerned that from what I understand, this developer plans to segregate affordable housing tenants into a separate building. Instead of a "poor door" they will be creating a "poor building". This tells me that their plans are not about helping the Greenpoint community but instead are about building more luxury housing. They only plan to earmark 25% of the units affordable- this is by no means enough and should be 100% affordable units. Greenpoint has seen the most units built in all of NYC in the last 14 years without much change to infrastructure and support for these new people. If these developers were really concerned about the housing crisis then there are plenty of other neighborhoods to build that could really use towers like this for the community. But that is not what is driving these developers- instead it is LUXURY for wealthy people at the expense of the neighborhood.

I am concerned about the egregious height of the towers, the impact on the inlet and wildlife, and the removal of parkland designation. These towers are not being built to improve housing options for Greenpoint residents or to provide more public space for residents. The proposal to build them is to make money- it is not about what the community needs. They are being proposed in the face of unfulfilled promises. I have lived and watched this development over the past 20 years and the infrastructure of Greenpoint can not keep up- and there are no plans by these developers to support public good or more infrastructure to help with the newly added 3,000 people.

Thank you for your consideration,

Mary Ellen Bizzarri
[REDACTED]



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Mike Burrill [REDACTED]

Date Tue 5/26/2026 12:39 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hi -

This is Mike Burrill, longtime resident of Greenpoint.

I'm writing to state my opposition to the Monitor Point plan - I understand the need for housing in our borough and in the city as a whole, but the large swaths of new housing in our immediate area have had many negative cultural and environmental implications. The establishment of the Monitor Point complex would no doubt further these deleterious changes.

thanks

mike burrill
[REDACTED]



[EXTERNAL] Monitor Point development at Bushwick Inlet

From Milena Blue Spruce [REDACTED]
Date Wed 5/27/2026 9:48 AM
To Land Use Testimony <landusetestimony@council.nyc.gov>

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Good morning,

I'm a Greenpoint resident, and I'm very concerned about the plans to rezone Monitor Point. I understand the desire to create more affordable housing—I live in an affordable housing unit myself—but the reality is that the proposed development is only going to contribute to pricing out even more people from this already overdeveloped neighborhood.

Bushwick Inlet Park hasn't even opened yet. Building luxury high rises practically on top of this new green space will be detrimental to everyone in the surrounding area. With towers soaring up all around the space already, I urge you to oppose the rezoning application. Let's keep Monitor Point as a transitional space between the park and other high rises.

A smaller building can still have affordable housing units without overwhelmingly raising the market value of the neighborhood even more. Please look at the bigger picture, and the future of this area, in terms of bringing the greatest good for members of the community who need it the most.

I urge you to listen to the voices of the people who currently reside in this neighborhood—the people who will be directly impacted. It worries me that some of the loudest voices are coming from people who do not live here, people who will simply benefit financially from the luxury tower construction. I want to reiterate that this project does not have the wellbeing of current residents in mind. This is exactly the type of luxury development that leads to everyone's rent increasing and more and more people getting priced out of the neighborhood.

Thank you,
Milena (Greenpoint resident and regular volunteer at Transmitter Park and Greenpoint Hunger Program)



[EXTERNAL] Opposition to Monitor Point Rezoning

From Natalie Friedman [REDACTED]

Date Tue 5/26/2026 10:22 AM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Mr. Restler,

I am a long time resident at 128 Wythe Ave in Williamsburg, just two blocks away from Monitor Point. I am STRONGLY opposed to the rezoning of this area.

This site was PROMISED to be a part of Bushwick Inlet Park to be enjoyed by ALL residents. The fact that the city is now GOING BACK ON ITS PROMISE to constituents is unacceptable. The city MUST keep its promise.

I was walking through Monitor Point the other day and saw beautiful families of birds thriving there (see videos below). I cannot stand to see this habitat destroyed in the name of a luxury building.

 [IMG 9337.mov](#)

 [IMG 9336.mov](#)

 [IMG 9338.mov](#)

 [IMG 9339.mov](#)



[EXTERNAL] Opposition to Monitor Point Rezoning

From nataliemoore [REDACTED]
Date Tue 5/26/2026 7:47 PM
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>
Cc savetheinletbk@gmail.com <savetheinletbk@gmail.com>

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Dear Lincoln and the City Council,

Greenpoint has had the most high rise high cost development in the city over the past 10 years, Over 29,000 new units built in our district, the most of any neighborhood in NYC for the last 14 years in fact. We have also had the least amount of green space, just .6 acres per 1,000 residents which is abysmal considering the recommended 2.5 acres per 1,000 residents.

With a changing climate and increased risk of flooding, what the waterfront needs is more resilient landscaping, imitating at least some of the marshy areas that kept the neighbourhood healthy before the oil companies started dredging in the 1800s. Residents of Greenpoint have been long denied access to the waterfront and green space and much of the ground and water has been polluted from neglect. The community has been fighting hard for remediation and green space for over 30 years. The proposed concrete pathways do nothing to address this fact while adding another high rent high rise apartment building pushing rental costs even further out of reach for long term residents and their families.

Public space is for the public good. Looking at other areas of the city where green space has been prioritised — Brooklyn bridge park including piers 1 6, The East River park in Manhattan, the entire west side of Manhattan along the Hudson River. Why are those areas allowed green space, playing fields, tennis courts, outdoor performance space, continuous bike paths, when we get are gleaming high rises and legacy toxic fields covered with concrete?

For the reasons stated above and many others, I urge you not to approve Monitor Point.

Thank you for your time in reading my note.

Best Regards,
Natalie Moore
[REDACTED]
Brooklyn NY 11222

Resident of Greenpoint since 1996.



[EXTERNAL] Opposition to the Monitor Point Rezoning

From [REDACTED]
Date Fri 5/29/2026 3:58 PM
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>; District33 <District33@council.nyc.gov>

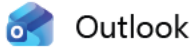
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Hello,

I'm writing today as a resident of Greenpoint to oppose the Monitor Point Rezoning. The Bushwick Inlet is a rare area along Greenpoint's edge where you can smell the fresh air of the water, see birds perched on the water's edge, and experience a moment of peace between traffic and commercial hubs. To rezone and develop this area would not only disrupt this remaining connection point to the environment for humans, but for animals as well. This development would steal public parkland that community members rely on, leave the neighborhood less safe against increasing heat and sea level rise threats, further erode neighborhood culture and affordability by advancing overbuilt, under-occupied luxury housing, and threaten a rare ecological safe harbor for many species. Not to mention, it violates a 2005 rezoning agreement promising the land to serve as the buffer and transition zone that is still desperately needed.

I urge you to stand up for the better present and future of Greenpoint and oppose the rezoning. Thank you for your consideration.

Best,
Nina Prescott



[EXTERNAL] Opposition to Monitor Point Rezoning

From Nora Hogan [REDACTED]

Date Tue 5/26/2026 2:09 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Councilmember Restler,

I am writing to you today to voice my opposition to the Monitor Point development.

Greenpoint's waterfront cannot afford another luxury skyscraper without serious infrastructure improvements in the neighborhood, including increased G train service, new park space, and additional funding for small business owners.

I also do not understand why we need more **luxury** housing in particular. There are more than enough overpriced units on the market, but nearly no affordable options, save for the affordable housing lottery. However, not everyone can win a lottery, and we desperately need options to retain middle and lower-income residents in Greenpoint.

Lastly, the developer's plan to build a building on an estuary within a flood zone is a serious mistake. It is inevitable that this proposed building would be seriously affected by a future, supercharged storm. As a result, more of my taxpayer dollars would go towards this **private** developer's FEMA bailout.

Thank you for considering my concerns and your continued work to help our community.

Best,
Nora Hogan



[EXTERNAL] Opposition to Monitor Point Rezoning

From Olivia Austin [REDACTED]

Date Tue 5/26/2026 11:44 AM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hi there,

I am a GP resident who has been living in the neighborhood for 10 years. This place is my home and I have seen it change significantly since I have been here. The cost of living crisis is out of control and has pushed many of my lower income neighbors out. We know that building more housing in NY unfortunately does not solve the cost of living crisis in this city and I STRONGLY OPPOSE the monitor point rezoning for this reason.

I also STRONGLY OPPOSE it because of the absolute environmental destruction it will cause.

NO TO GOTHAM!!!!!!

Thank you,
Olivia



[EXTERNAL] Opposition to Monitor Point Rezoning

From oona ratcliffe [REDACTED]

Date Tue 5/26/2026 7:53 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Lincoln and the Council:

I strongly oppose Monitor Point Rezoning.

This is a **giveaway of public land** to a private developer proposing three luxury towers **21, 41 and 56 stories tall** just 50 feet from the shoreline of **Bushwick Inlet**, one of the East River's only natural tidal estuaries.

This land belongs to the public and must serve the **public good**, not private luxury development.

Please vote no. We urge you to honor the neighborhood and preserve our estuary.

Oona

Statement of Paul Pullo in Support of the Monitor Point Application
May 27, 2026 City Council Public Hearing
Subcommittee on Zoning and Franchises

Dear Members of the City Council,

I am writing to express my strong support for the Monitor Point project at 40 & 56 Quay Street. I am a member of the Greenpoint Monitor Museum's board of directors and have a background in commercial real estate, including commercial real estate in Greenpoint. Monitor Point is an excellent project that will create a home for the Museum, new housing (including permanently affordable housing), and other key community benefits.

I urge you to approve this project in full, including the demapping application that would remove an outdated "park" designation from the Museum's property at 56 Quay Street. Although Brooklyn CB1 recommended approval of the rezoning and special permit application and denial of the demapping application, it would be irrational and arbitrary for the Council to adopt these inconsistent recommendations. There is no sense in rezoning the Museum's property as R8 to permit the museum use while leaving the "park" label in place. The city map should reflect the property's status as privately owned, developable land for a permanent home for the Museum.

The Museum's land is and has always been privately owned. Although it is currently shown as a "park" on the city map, it is not a park because the city never acquired it for park use. In 2004, the Museum learned that the city planned to condemn the Museum's land, but NYC Parks has now repeatedly confirmed in writing that it has no intention to exercise eminent domain. The "park" label should be removed.


If the "park" label is not removed, that outdated designation will unfairly single out the Museum for potential clouded title, delayed permitting, and legal challenges. This will, in turn, cause questions and delays from lenders and other funding sources. Therefore, the "park" label will impede the Museum's educational mission and directly harm the Museum, for no reason and for no benefit to the public whatsoever.

By contrast, the Monitor Point project is a clear win for Greenpoint and the city. It will not only create a home for the Museum, it will also create 1,150 homes for New Yorkers, of which 40% will be permanently affordable (460 units). It will create 51,500 sf of waterfront open space connecting Bushwick Inlet Park to northern areas, enable the long-awaited Box Street Park, provide annual funding to the NYC Parks for Bushwick Inlet Park, and remove industrial truck traffic from residential streets. All of these benefits will come from hundreds of millions of dollars in private investment, without the city and its taxpayers needing to spend a dime on condemnation.

It is remarkable that our community will gain such extensive benefits through a developer-led public-private partnership. Practically, however, these full benefits will only be possible if all aspects of the land use applications are approved in full.

I urge you to support this project, which will deliver a home for the Museum, plus the affordable housing, open space, and infrastructure improvements our neighborhood needs.

Thank you for your consideration.


Paul Pullo

Subcommittee on Zoning and Franchises

May 27, 2026

Monitor Point

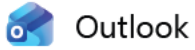
Testimony in Support of Rezoning

My name is Pedram Mahdavi and I am testifying in support of the Monitor Point project. I am a 15 year Brooklyn resident and work in the field of affordable housing development and policy.

The proposed Monitor Point rezoning is the best opportunity to turn this site into a true benefit for the city and surrounding communities. The city and community pushed the developer to provide significant benefits and take on the risk of delivering. The city gets over a thousand apartments, hundreds of which are affordable, new open space to add to the flourishing Williamsburg Greenpoint waterfront, funding for the transit system and a solution to relocate MTA uses that no longer belong in this area. This is a great deal for the public. Importantly, the community board's approval of the proposal demonstrates that they recognize the benefits and value, and the building scale necessary to bring those about.

If not approved, the site will remain a poorly utilized parking garage for years to come and the city will lose out on badly needed housing. The city needs housing and it needs it now. That is not a reason to approve bad projects but it is a reason to move swiftly on clear winning proposals like Monitor Point.

I respectfully urge the Council to approve this rezoning and help deliver thousands of apartments.



[EXTERNAL] Opposition+to+Monitor+Point+Rezoning

From Peter Guenther [REDACTED]

Date Fri 5/22/2026 2:27 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Capitalism is corruption, don't steal the commons from people, future and current generations of children, stealing the inlet will corrupt you and the social fabric, bastards



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Reid Skibell [REDACTED]**Date** Tue 5/19/2026 6:28 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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We were promised parkland in North Brooklyn in exchange for the original 2005 zoning changes, which didn't happen in a meaningful way. It would be a catastrophe for Williamsburg to have a giant tower at Monitor Point. I strongly oppose the rezoning.

Regards,

Reid Skibell



RESILIENT RED HOOK

Written Testimony on the Monitor Point ULURP Application

Monitor Point / Bushwick Inlet Park

CEQR No. 24DCP070K | ULURP Nos. C 260105 ZMK et al.

40–56 Quay Street, Greenpoint, Brooklyn

Submitted to the New York City Council

Committee on Land Use

May 27, 2026

I. Opening Statement

Resilient Red Hook (RRH) submits this testimony in opposition to the Monitor Point ULURP application and respectfully urges the City Council to **reject the proposed upzoning**. We endorse and incorporate by reference the detailed DEIS testimony of Veronica Zapasnik, whose 92-page technical analysis documents the applicants' analytical failures with exceptional rigor. We write to amplify the arguments most consequential to the Council's final vote.

Resilient Red Hook is a community-based organization in Red Hook, Brooklyn, working at the intersection of waterfront policy, climate resilience, environmental justice, and anti-displacement advocacy. The issues raised by Monitor Point—the treatment of public land, the adequacy of environmental review for waterfront development in a climate-vulnerable coastal zone, the displacement dynamics of large-scale upzoning, and the standard to which publicly owned sites must be held—are of direct relevance to Red Hook, which faces the same pressures at Brooklyn Marine Terminal.

This application has now been reviewed by Community Board 1, the Brooklyn Borough President, and the City Planning Commission. Every advisory body that has considered it has found the developer's proposed 25% affordability level inadequate. The developer has publicly stated that anything above 40% affordability could compromise the project's economic viability. When the developer's stated ceiling is below every advisory body's stated floor, the Council should ask whether the project itself—not just its affordability percentage—is the right approach for this publicly owned site.

II. The Applicants Present a False Choice on Public Land

As Zapasnik documents in detail, the DEIS frames the decision as the applicants' preferred tower scheme or a No-Action scenario in which the site remains as it is. That is not a serious alternatives framework for a publicly controlled waterfront site. It is a false binary.

This framing collapses when confronted with a critical fact: the MTA's own 2021 staff summary indicates that Gotham Organization agreed to relocate the MTA Mobile Wash Unit on Lot 1 even if the requested upzoning were denied. This finding, highlighted in the Save the Inlet submission to Community Board 1, directly undermines one of the applicants' central arguments—that the full rezoning package is necessary to unlock any redevelopment of the site. The MTA facility relocation does not depend on approval of three luxury towers.

The DEIS analyzes only three alternatives: No-Action (frozen status quo), Existing Zoning (a deliberately stripped-down 280-unit scenario with no affordable housing and no museum), and a No Unmitigated Significant Adverse Impacts Alternative that is not a genuine land-use alternative at all—it is a one-intersection transportation sensitivity exercise that the DEIS uses to claim the project would need to be reduced to just 45 units. Zapasnik correctly identifies this as a false binary designed to make the preferred scheme appear inevitable.

The DEIS fails to analyze any of the following reasonable alternatives:

1. Park Acquisition Alternative: MTA transfers 40 Quay Street to NYC Parks; the City acquires Lot 25 to complete Bushwick Inlet Park as promised in 2005.
2. 100% Affordable Alternative: Development at the proposed or reduced scale with 100% permanently affordable housing, consistent with the Borough President's public-land standard.
3. Reduced Density / Partial Park Alternative: A smaller-scale development with some combination of affordability, shoreline stabilization, and expanded integrated park space.
4. Phased Alternative: A staged development that tests whether public benefits can be delivered at lower density before committing to the full tower program.

III. This Is a Public-Land Deal with an Extraordinarily Low Public Return

The Council should understand the actual financial terms of this transaction. As confirmed by MTA and Gotham at the Borough President's public hearing on March 11, 2026, this 99-year lease would generate approximately **\$50 million in net present value** for the MTA—approximately \$10 million at construction start and roughly \$2 million annually thereafter.

As Zapasnik puts it: that \$50 million is what the MTA currently earns from one month of congestion pricing revenue. It is also the approximate cost of making a single subway station ADA accessible. The permanent neighborhood consequences of this project—increased luxury-rent spillover, greater density, a worsening open-space deficit, irreversible shadow and ecological impacts—are being exchanged for a level of public value that is extraordinarily small by the MTA's own operating and capital standards.

If the public return is this low, the Council should ask much harder questions about whether this publicly owned waterfront site would be better used for park expansion, open space, climate

adaptation, or a substantially smaller project that does less harm. Ninety-nine years is longer than the New York City subway system has existed. The Council is being asked to lease public waterfront land for essentially the entirety of the next century, primarily for market-rate luxury housing, for a return equivalent to one month of toll revenue.

IV. The Project Is a Departure from—Not a Fulfilment of—the 2005 Rezoning

DEIS: Lot 1 was rezoned to an R6 zoning district as part of the 2005 Greenpoint-Williamsburg Rezoning... establishing this site for future residential development. The current proposal is the fulfillment of the City's vision for this site as established by the 2005 rezoning.

RRH Response: The 2005 rezoning established R6 zoning—a medium-density district with a maximum FAR of 2.54 (3.05 with UAP)—as the appropriate scale for this site, precisely because of its location at the Bushwick Inlet waterfront edge. As Zapasnik documents, the R6 buffer was part of deliberately crafted transition logic: lower density at the park edge, higher density further inland. The current proposal seeks to nearly triple the FAR to 7.2 in an R8 district. Characterizing this radical upzoning as a “fulfilment” of the 2005 vision is inaccurate—it is a reversal of the buffer logic that made the 2005 compromise workable.

Community Board 1's 2005 response set clear expectations: an FAR of 3.4 with mandatory affordable housing, or 3.7 with amenity incentives. The approved resolution capped at 4.7 with incentives. Monitor Point seeks 7.2—nearly double the approved ceiling and more than double the community's recommendation. Meanwhile, the park that was the centerpiece commitment of the 2005 rezoning remains roughly 80% unfinished after twenty years and over \$350 million in land acquisition costs.

Both the Borough President and Community Board 1 conditioned their approvals on increasing affordability to at least 50% and fully funding Bushwick Inlet Park. The DEIS does not analyze a 50% affordable scenario, a 75% scenario (as CB1's Land Use Committee unanimously recommended before being overridden), or a 100% scenario consistent with the Borough President's own public-land standard. The environmental review evaluated a project every advisory body found inadequate on affordability—yet treated the developer's preferred 25% as the operative program.

V. The Demapping of Lot 25 Parkland Is a Consequential Land-Use Action Disguised as a Technicality

The City Map amendment to remove the park designation from Lot 25 would generate 367,228 zsf for the developer, enabling roughly 120 additional dwelling units. The DEIS presents this as a minor administrative step needed to facilitate the museum and landscaped open space. As Zapasnik documents, this understates what is actually happening: parkland at the Bushwick Inlet edge is being demapped to increase the development capacity of the overall project. This is a major land-use and development-rights consequence that should be disclosed plainly, not obscured within approval mechanics.

The DEIS relies on NYC Parks' stated non-interest in acquiring the property to justify the demapping. But this is a policy choice, not a settled fact. The 2005 rezoning explicitly contemplated this area as part of Bushwick Inlet Park. Twenty years later, the City proposes to demap the park boundary and hand the parcel to a private developer. The DEIS should have analyzed a park-acquisition alternative in which the City completes the park as originally promised.

VI. The Project Worsens an Already Critical Open-Space Deficit

The DEIS's own numbers are damning. The active open space ratio would fall from 1.07 to 0.98 acres per 1,000 residents—less than half the CEQR guideline of 2.0 acres. The DEIS then dismisses this by noting the deficit already existed. As Zapasnik states: "That is exactly backward. A neighborhood that already lacks enough active open space is the very place where additional burdens should be scrutinized most carefully, not excused most easily."

The DEIS's reported 8% decrease understates the actual impact. The DEIS states that Bushwick Inlet Park will encompass 35.53 acres upon completion. This figure includes approximately 8 acres of water areas and unusable buffer zones that cannot function as recreational open space. When the open space ratio is recalculated using accurate usable parkland acreage (27–28 acres rather than 35.53), the decrease is approximately 18%—more than double the reported figure and well above the threshold at which CEQR methodology requires a finding of significant adverse impact. The DEIS's conclusion of "no significant adverse impact" to open space is built on an inflated baseline.

The DEIS further inflates its open space claims by conflating categories that are not equivalent. The "50,000 square feet of new open space" headline includes 34,000 sf of required WPAA (which would be required under any waterfront development, including as-of-right), 9,000 sf of PAA (including approximately 2,000 sf of vehicular turnaround), 7,000 sf of museum-adjacent landscaping, and 18,000 sf of private rooftop terraces available only to building residents. Private terraces are not public open space. Vehicular turnarounds are not recreation areas. Required waterfront access is not a discretionary public benefit. The Council should evaluate what the project actually delivers, not the broadest possible packaging of claimed benefits.

VII. The Ecological Significance of Bushwick Inlet Is Visible and Cannot Be Dismissed

Since the April 29, 2026 opening of the Motiva Parcel at 1 Franklin Street, the ecological significance of Bushwick Inlet is more visible than ever. On any given day, dozens of bird species can be observed in the water and along the shoreline. The inlet supports Essential Fish Habitat for multiple species and life stages, an active Billion Oyster Project research station, and habitat for Atlantic Sturgeon and Shortnose Sturgeon (both listed species) known to occur in the adjacent East River.

DEIS: The Development Site does not possess any natural resource of significant value.

RRH Response: This is one of the most troubling statements in the record. It reduces a complex waterfront ecological setting to the narrowest description of the upland parcel while

ignoring what the site directly fronts. As Zapasnik documents, City Planning itself recognized in its March 14, 2005 report that Bushwick Inlet is “the only sheltered body of water along this stretch of the East River waterfront” and noted its importance for habitat and public access. The proposed steel sheet-pile bulkhead directly contradicts the Bushwick Inlet Park master plan’s soft-edge design standard. The DEIS does not analyze bird-collision and nighttime-lighting hazards from the proposed 600-foot waterfront towers—despite documenting 137 avian species at Bushwick Inlet Park including migratory warblers.

We respectfully urge Council Members to visit the newly opened Motiva Parcel before voting. Standing at the water’s edge makes the scale of what is proposed—and what would be lost—impossible to ignore.

VIII. The Socioeconomic and Displacement Analysis Is Designed to Produce a Predetermined Conclusion

The DEIS uses a half-mile study area where median household income is already \$141,735 and median rent is \$2,819—figures reflecting two decades of post-rezoning gentrification. It then finds that the new population (average income \$179,036–\$180,557) would be “similar” to the existing population. By measuring new residents against an already-gentrified baseline, the analysis mechanically produces a “no impact” finding regardless of actual displacement effects on remaining lower-income and rent-stabilized tenants.

As Zapasnik documents, the large majority of the project’s 1,150 units would be market-rate luxury housing. Based on broker estimates and comparable nearby towers, 2–3 bedroom units are expected to rent for roughly \$9,000–\$16,000 per month. These rents do not stay contained at the top of the market—they establish new benchmarks that filter through the neighborhood, raising asking rents and accelerating residential and commercial displacement. A recent study by researchers at UC Berkeley, the University of Toronto, Georgia Tech, and UCLA argues that housing unaffordability is driven more by income inequality and capital concentration than by simple supply shortage, undercutting the claim that adding luxury supply on this public site will meaningfully improve affordability.

Community District 1 has absorbed nearly 30,000 new apartments since 2010—more than any other district in the city—while losing more than 15,000 Latino residents. A project that introduces 850 market-rate luxury units into this context cannot credibly be assessed as having no socioeconomic impact.

IX. Shadows, Stormwater, and Climate Resilience

The proposed 56-story tower (600 feet, 640 with bulkhead) would cast shadows of extraordinary reach. The DEIS does not model cumulative shadow impacts when combined with the approved West Wharf towers, Calyer Place, and other pipeline projects. The combined shadow wall these developments create will fundamentally alter the usability of Bushwick Inlet Park—a park that is still under construction after twenty years of delay.

The DEIS's stormwater analysis relies on four standard DEP rainfall events from the Flow Volume Calculation Matrix. It does not model the extreme rainfall events that have defined New York City's climate reality since 2021—including the Ida remnants and the September 2023 storm. For a project sited 50 feet from the East River in a FEMA AE flood zone, this is an analytical failure, not a conservative assumption.

X. The Applicants Have Not Presented the Project Honestly to the Public

As Zapasnik documents extensively, Gotham has repeatedly declined to provide clear, representative, true-to-scale neighborhood renderings of the project despite direct requests from Community Board 1's Land Use Committee. The DEIS's key urban design figures are labeled "illustrative," "conceptual," and "for illustrative purposes only." The only actual physical scale model to surface in the public record appears buried in Appendix D of the DEIS—the Gradient Wind wind-tunnel study.

This creates a striking contradiction. In their marketing materials, the applicants emphasize that Monitor Point would be just another tower in an already high-rise waterfront area. But in the wind-study model—the only true-to-scale depiction—the proposed towers appear against a context dominated by 1- to 3-story neighboring buildings. The applicants invoke nearby towers when it normalizes their project, but the clearest visual evidence shows that framing is deeply misleading. The Council should not approve a project whose proponents have consistently avoided showing the public what it would actually look like.

XI. The DEIS Repeatedly Presents Advocacy as Analysis

Zapasnik's testimony documents a pattern that pervades the entire DEIS: the applicants assume their project's benefits as if they resolve the central questions the Commission is being asked to decide. They use an existing open-space shortfall to excuse making it worse. They point to existing waterfront development to justify still more bulk at the park edge. They reduce Bushwick Inlet's ecological significance to the condition of a degraded upland parcel. They package required public access areas, private terraces, and speculative off-site benefits as though all were comparable public gains. They characterize the project as "enhancing" neighborhood character—a conclusion that is advocacy, not analysis.

This is not the "hard look" that SEQRA and CEQR require. The Council should be especially cautious when the applicants' central analytical move is to convert contested planning judgments into assumed truths.

XII. Developer Track Record

Gotham Organization and its partners have paid over \$2 million in penalties for violating federal civil rights laws mandating disability access in housing developments built with federal funds. These violations were found across three large Gotham developments in New York City, and

Gotham remains under compliance monitoring. The Council should consider this record when evaluating the credibility of community-benefit promises.

XIII. The MTA Created the Conditions It Now Uses to Justify This Upzoning

The DEIS's central narrative is that the site has remained "underdeveloped" since the 2005 rezoning and that only the proposed upzoning can unlock its potential. But the MTA is not a passive bystander—it is a co-applicant and the public owner of Lot 1. The MTA chose to leave its Mobile Wash Unit on this residentially zoned site for twenty years after the 2005 rezoning made it a nonconforming use. It chose not to relocate the facility. It chose not to pursue as-of-right residential development. It chose not to make the site available for park expansion. The "undeveloped" condition the DEIS now cites as the problem requiring this 1.2-million-gsf solution is a condition the MTA itself created through two decades of inaction on a site it controls.

This is a pattern we have documented at Brooklyn Marine Terminal, where NYC EDC's own failures—years of deferred shore power installation, a manipulated RFEI process, a task force structured to produce a predetermined outcome—created the conditions EDC then used to justify its Vision Plan. At Monitor Point, the mechanism is simpler but the logic is identical: the public agency that controls the site allowed it to stagnate, and now frames a massive upzoning as the only way to "unlock" a site that was always within its power to develop, transfer, or repurpose. The Council should not reward this self-created vacancy with a tripling of the FAR and a 99-year lease to a private developer.

XIV. Required Compliance Is Being Packaged as Discretionary Benefits

The DEIS lists the project's benefits at length: waterfront public access, environmental remediation, shoreline stabilization, the MTA facility relocation, and "long-term funding" for Bushwick Inlet Park. The Council should understand what these claims actually represent:

The 34,000-sf Waterfront Public Access Area is required by waterfront zoning. It would be required under any development of this site, including as-of-right development under the existing R6 district. It is a legal obligation, not a gift.

Environmental remediation is required by E-Designation E-138, which has been on these lots since the 2005 rezoning. No development can proceed without it. The developer has also enrolled in the NYS Brownfield Cleanup Program, which provides substantial tax credits—including a cost-plus-5% incentive for sites involving affordable housing. The public will likely bear these costs directly or indirectly through foregone tax revenue. Remediation should not be credited as a developer contribution.

The shoreline bulkhead is required to develop the site at any scale. The existing revetment is failing and eroding. Any construction on Lot 1 would require shoreline stabilization as a structural prerequisite.

The MTA facility relocation was already agreed to by Gotham even without the rezoning, according to the MTA's own 2021 staff summary. It is not contingent on approval of the full upzoning package.

When legally mandated compliance, pre-existing commitments, and publicly subsidized cleanup are stripped from the benefits ledger, what remains is: approximately 300 affordable units (the MIH minimum), \$300,000 per year in park operations funding (\$25,000 per month for a 35-acre park system), and a museum. These are real but modest benefits. They do not justify a 99-year lease of public waterfront land, a tripling of FAR, the demapping of parkland, and the permanent transformation of the Bushwick Inlet edge.

XV. A 99-Year Lease with No Governance Framework

The Council is being asked to approve a project that would lease public waterfront land for 99 years. That is longer than the New York City subway system has existed. Yet neither the DEIS nor the ULURP application addresses the fundamental governance questions a commitment of this duration raises.

Who enforces the affordability commitments in year 50? MIH regulatory agreements have finite terms. What happens when they expire? What oversight body monitors the \$300,000 annual park contribution across administrations, recessions, and ownership changes? What recourse does the community have if Gotham sells the lease to a subsequent owner with no relationship to the original promises? How are climate-adaptation obligations maintained as sea levels rise and building codes change? What mechanism exists for the public to recapture value if the site appreciates dramatically—as every waterfront site in Brooklyn has over the past two decades?

At Brooklyn Marine Terminal, we have documented how projects like Atlantic Yards and Hudson Yards used long-term public-private frameworks that were amended repeatedly without meaningful public oversight, delivering only a fraction of promised community benefits decades later. The Council should not approve a 99-year disposition of public land without a governance framework that includes: enforceable affordability terms that survive lease transfers; periodic public review and value-recapture mechanisms; binding climate-adaptation and maintenance obligations; and community oversight structures with real authority—not advisory roles.

XVI. Conclusion

This application asks the Council to accept too much at once: **too much bulk at the Bushwick Inlet waterfront edge, too little public return for the use of public land, too much deterioration in an already critical open-space deficit, too much minimization of the ecological significance of Bushwick Inlet, too much reliance on misleading or speculative benefits, and too much confidence in an environmental review that too often reads as advocacy rather than neutral analysis.**

We ask the Council to:

1. Reject the proposed upzoning and direct the MTA to evaluate a direct transfer of the 40 Quay Street site to NYC Parks for completion of Bushwick Inlet Park.

2. If any housing is approved on this publicly owned site, require 100% permanently affordable housing consistent with the Borough President's Comprehensive Plan standard for public land(despite his conditional approval not demanding 100%) .
3. Require a Supplemental EIS correcting the analytical deficiencies documented in this testimony and in the Zapasnik DEIS submission—including a rezoning-specific displacement study, updated stormwater modeling with post-2021 extreme events, accurate open space calculations using actual usable BIP acreage, cumulative shadow analysis, a meaningful alternatives analysis, and an honest visual-impact assessment.
4. Require comprehensive Phase II environmental sampling at both lots before any land-use approval.
5. Require a binding, fully funded commitment to complete Bushwick Inlet Park before any additional upzoning is approved adjacent to the park.
6. Deny the WPAA waiver and require WEDG compliance.
7. Require that any affordable housing receive equivalent flood protection to market-rate towers—no differential flood risk by income.
8. Require the applicants to present the public with true-to-scale, context-accurate visual depictions of the project—not conceptual marketing materials.

We submit this testimony in solidarity with the 5,500 petitioners opposed to the Monitor Point upzoning, Friends of Bushwick Inlet Park, Save the Inlet, and the detailed DEIS comment record of Veronica Zapasnik.

Respectfully submitted,

Victoria Alexander

Chair, Resilient Red Hook

351 Van Brunt Street, Brooklyn, NY 11231

Greenpoint and Williamsburg have given enough. Finish the park. Make public land work for the public.

RICHARD T. KENNEY
Public Hearing on Monitor Point Project (5/27/26)

TO: The New York City Council

My name is Rick Kenney. I am a lifelong resident of Greenpoint and a U.S. Marine Corps Veteran. I am a Past Commander of the local St. Stanislaus Memorial Post #1771, American Legion, and Past Grand Knight of Lexington Council #293, Knights of Columbus, which was chartered in Greenpoint in 1897.

I am writing to the City Council to express my support for the Greenpoint Monitor Museum, as part of the Monitor Point Development. I have been involved with this project since its inception.

The Museum represents a unique and distinctive addition to the historical fabric of the Greenpoint/Williamsburg community, through all wars but in particular, the nation's Civil War. The story of the clash of the first ironclad warships is well known and need not be repeated here. However, the context of the USS MONITOR's construction and overwhelming victory in that battle bears repeating to put it in perspective.

The epic battle represented a decisive moment in the war. More importantly, it launched a new era of naval technology for the whole world. It is no understatement to say the power of New York's industry saved the Union. The significance of the innovation and ingenuity of the engineers and tradesmen of that era must be passed on to future generations. The Museum's new building, on the very waterfront where history was made, will provide a place for later generations of visionaries to honor that history and imagine what can be accomplished next. The Monitor Point's application is the Museum's most promising chance to make that building a reality.

This project will give the Museum the resources it needs to fund construction and operations. While the neighborhood must necessarily change with the times, it must never forget to commemorate the ethos and determination that established its place in history. I urge the Council, without any reservation, to approve the application for Monitor Point, and its namesake USS MONITOR Museum.

Thank you,

RICK KENNEY



[EXTERNAL] Opposition to Monitor Point Rezoning

From Richelle Cyrus [REDACTED]

Date Thu 5/21/2026 9:35 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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To whom it may concern,

I have been a resident of CB1 for 10+ years and have seen the drastic shifts that have taken place with the neighborhood in terms of new buildings and residents.

I am opposed to the monitor point rezoning because

- 1. CB1 has produced more housing in the past decade than any other CB. Point. Blank. Period.** This is felt everyday when trying to get on the train to commute to work and having to wait for 3 4 trains to pass before you can squish your way on. This is felt when you want a relaxing day in one of our FEW parks, and they're absolutely overcrowded with people (who refuse to pick up their dog poop). This is felt when you want to pop into a grocery store for eggs and have to wait on line for 20 minutes because there are probably 5,000 more people than the area can realistically support. ENOUGH IS ENOUGH. There are countless luxury buildings along the waterfront that remain empty we do not need more housing here.
- 2. We are DESPERATE for more open space.** We deserve at least one protected area on the waterfront free of thirsty developers waiting to sink their teeth into any swath of land available to build their newest tower which, by the way, will definitely need to be demolished in ~10 years when the sea levels rise and the waterfront continues to erode. This week's flash flooding is a prime example.
- 3. I am by no means an ecologist or environmentalist, but anyone who has lived here long enough can attest to the clear changes that have occurred to our already limited wildlife.** Dead birds litter the bike lanes on Kent in the springtime after flying into the tall glass buildings built directly in their flight path. It's disgusting, it's sad, and it's an often overlooked negative impact humans are causing as we continue to put profits before people.

I don't know if anyone will read this, but I hope someone does take this and the thoughts/prayers from all of the other CB1 neighbors and DO NOT approve the rezoning of Monitor Point.

If you would like to discuss this over the phone I can be reached at [REDACTED]

-Richelle



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Rob Buchanan [REDACTED]**Date** Tue 5/26/2026 8:30 AM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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To Councilmember Restler and the rest of the City Council:

I oppose the construction of high rise towers, including one of 60 stories, less than 100 feet from Bushwick Inlet. The existing zoning around the Inlet was put in place to protect a unique geographical, ecological and cultural asset. That planning vision should not be tossed aside, and the Inlet walled off from the community, just because the developer has promised a relatively high ratio of apartment rentals at somewhat less than market rate. Location and appropriate scale are factors that must also be considered, and in this case they should be paramount.

Rob Buchanan, Brooklyn



[EXTERNAL] Opposition to the Monitor Point Rezoning

From Robert Raphael [REDACTED]

Date Fri 5/29/2026 7:44 AM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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To whom it may concern,

I am writing to object to the rezoning and construction of the "Monitor Point" towers in Greenpoint. I have been a resident of Williamsburg for 20 years. I will keep this short and sweet.

The entire neighborhood was rezoned in 2005 so towers could be built along the entire Williamsburg waterfront. As part of this deal, the neighborhood would receive the 1.5-mile Bushwick Inlet Park along the waterfront. We have only received a very small portion of this promised park. Greenpoint and Williamsburg gained 26,232 new housing units between 2010 and 2024, the largest increase of any New York City neighborhood, yet in 2026, the park remains half realized and underfunded. Williamsburg has some of the lowest per capita green space in the entire city. A large stretch of our promised park is fenced-in wasteland. One section is the concrete foundation of the previous city storage facility, and another asphalt-covered section has become a dumping ground for the city parks department with old playground equipment and park benches piled up. Unfortunately, our promised park looks like a scene from the Planet of the Apes.

This spring, the new but very small section of the park opened on the inlet. I have to say it is by far the most beautiful section yet. For 20 years, I have walked up Kent Ave past the park while it was overgrown and fenced in. Now that it is completed, that area is breathtaking. My first day visiting, I saw a mother duck walking with all of her chicks. The ecological importance of the inlet is something not to be overlooked. The towers would sit on the banks of a rare and ecologically sensitive estuary that is only just beginning to recover from centuries of environmental exploitation. Monitor Point would also be located directly on top of the historic Bushwick Creek. Although the creek was filled in over a century ago, its underground flow still exacerbates flooding, all the way up to McCarren Park, during any significant rain event. This is Greenpoint's last undeveloped waterfront, and it deserves protection, not a 600-foot glass tower.

Our neighborhoods have built more housing than any other in the city. There is no reason it has to be built directly on top of this new and important park and flood zone. Monitor Point represents a betrayal: the land at 56 Quay Street was specifically set aside by the City as part of the 2005 rezoning for the future Bushwick Inlet Park. If the city allows this upzoning to go forward, it is nothing more

than a finger in the eye of the residents of this neighborhood who have been waiting for a completed park for 20 years. I implore those in a position to decide to say no to this development. It will only harm the neighborhood, raise rents for everyone who already lives here, do nothing for future flood resiliency, and destroy an ecological gem in a formerly industrial area.

I hope you make this decision with the residents of this neighborhood, not the developers, in mind.

Thank you

Robert Raphael

Robert Raphael

A large black rectangular redaction box covers the signature and any contact information that might have been present below the name.



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Ross Anti [REDACTED]**Date** Wed 5/27/2026 9:18 AM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear My Restler,

It is with great urgency that I express to you how much I oppose the development of Monitor Point into a residential tower and the like.

My wife and I have been [REDACTED] residents for over 10 years and have seen the waterfront towers developed at a rapid pace. We plan to stay here permanently and will do whatever it takes to keep our neighborhood from being pillaged by greedy developers. I can see the value of inviting more housing into the community, but at what point is it enough?

The Greenpoint waterfront is an NYC treasure and should be preserved for wildlife, parklands and in the name of keeping the skyline views viable for Greenpoint residents.

I know that I speak for thousands of Greenpoint residents. We have enough housing for now! Please help us keep Monitor point from being permanently altered and destroyed in the name of making someone who doesn't live here very rich.

Yours sincerely,
Ross Anti

--

Ross D. Anti
MSTOM: Acupuncture and Herbal Medicine
BS: Kinesiology, ACSM CPT



[EXTERNAL] Opposition to Monitor Point Rezoning

From Sabrina Stein [REDACTED]
Date Tue 5/26/2026 12:57 PM
To Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council Members,

I am writing to urge you to oppose the proposed Monitor Point development and rezoning at 40 Quay Street.

Bushwick Inlet is one of the last remaining natural tidal inlets on the East River and a rare ecological habitat that supports migratory birds, marine life, and climate resilience along the North Brooklyn waterfront. The proposed towers — reaching up to 56 stories — would dramatically alter the character and environmental function of this space just as Bushwick Inlet Park is finally nearing completion after decades of public promises and investment.

I am especially concerned that this proposal:

- Provides minimal public benefit while primarily creating luxury housing on public land.
- Adds nearly 3,000 new residents to a neighborhood already overwhelmed by development and lacking sufficient open space and infrastructure.
- Violates the spirit of the 2005 rezoning plan, which envisioned this site as a transition zone adjacent to parkland rather than massive luxury towers.
- Threatens a sensitive ecological area and places dense development directly within a flood prone zone.

This community has already delivered tens of thousands of new housing units over the last two decades. What North Brooklyn still lacks is adequate parkland, environmental protection, and resilient public space.

I respectfully ask that you stand with residents, environmental advocates, and park supporters by opposing this rezoning and advocating instead for preservation of Bushwick Inlet as a true public resource.

Thank you for your leadership and consideration.

[REDACTED]
Sincerely,

Sabrina

Sabrina Stein

[REDACTED]

[REDACTED]

To: Mr. Lincoln Restler, District 33 Council Member, Ms. Farrah Louis, Chair, Subcommittee on Zoning and Franchises, and Council members:

My name is Sarah Roberts, and I am Greenpoint resident where I've lived with my partner, a fifth-generation Greenpointer, for nearly the last five years. I am a licensed DEC wildlife rehabilitator, educator for [The Wild Bird Fund](#), and community advocate with Save the Inlet. I submit this written testimony to oppose the proposed rezoning and development. I have also included the testimony I've provided at each phase of the ULURP. The reader should note that this written testimony was shared with the City Planning Commission earlier in May 2026. The FEIS does not adequately address how supertall, illuminated waterfront buildings would intensify bird collision, disorientation, and habitat disruption at Bushwick Inlet within the [Atlantic Flyway](#).

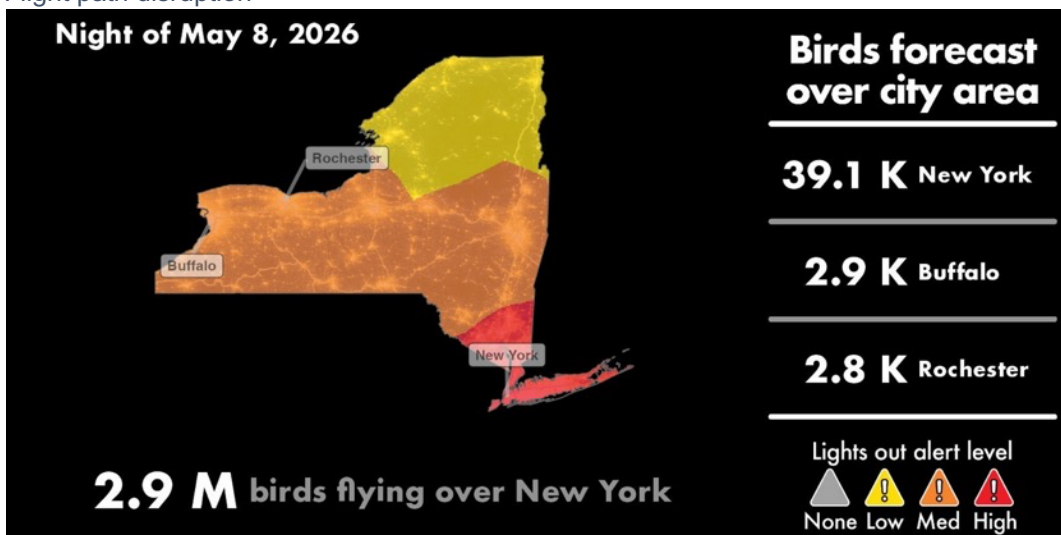
1. [Bushwick Inlet Is a Critical Urban Estuary](#) Within the Atlantic Flyway

Bushwick Inlet is not vacant land waiting to be "activated." It is a functioning ecological corridor and one of the few remaining open waterfront habitats in North Brooklyn. The inlet sits directly within the Atlantic Flyway, the primary migratory route used by hundreds of bird species moving between breeding and wintering grounds along the East Coast. Millions of birds pass through New York City annually, relying on fragmented urban green spaces, waterways, and shoreline habitats for rest, navigation, feeding, and shelter. The Bushwick Inlet Park, the estuary, and the nearby waterfront together offer:

2. The Proposed Building Heights Create Severe Bird Collision and Disorientation Risks

The proposed building heights and massing would substantially increase the risk of collision and disorientation for migratory birds moving along the inlet. Migratory birds frequently travel at elevations affected by high-rise structures—especially during coastal fog, storms, and other poor-visibility conditions, and during nocturnal migration. Placing large, illuminated towers directly along this shoreline risks:

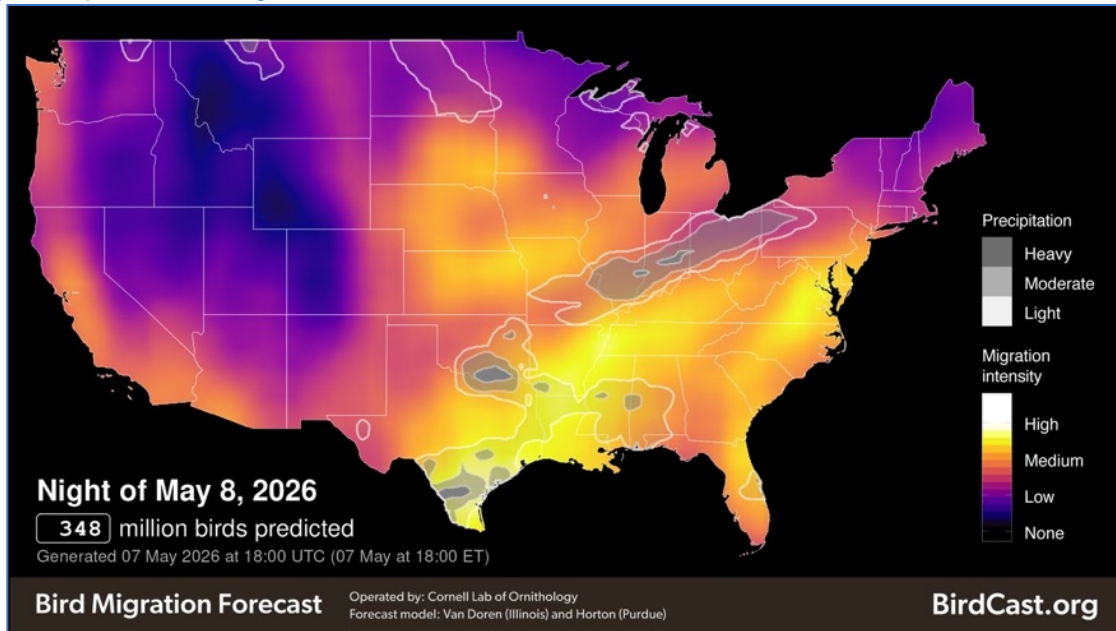
- Collision hazards based on the land's orientation in the flyway
- Light disorientation
- Flight path disruption
- Increased exhaustion during migration
- Mortality events during severe weather systems



Map 1- [New York: Migration forecast & seasonal timing \(Purdue Aero Eco Lab\)](#)

As a licensed wildlife rehabilitator and educator with the [Wild Bird Fund](#), I routinely see injuries linked to collisions with reflective and illuminated buildings. Even with bird-friendly elements, collision risk rises with building scale, lighting, glass surface area, and height. Additional examples of conflict unique to urban areas also arise, such as migrating birds nesting on residential apartment roofs. Given the nesting Canada Geese, Killdeer, and Mallards, it's a notable ground for overnight migrants, breeding and

seasonal residents, and other species alike—[over 151 species have been observed in the Inlet, more than any other park in our neighborhood.](#)



Map 2- Migration forecast for 8 May from [Birdcast.org](https://birdcast.org).¹

The FEIS relies heavily on bird-safe glass and [related mitigation measures](#), but these measures **cannot** eliminate the cumulative impacts of multiple waterfront towers of this height and massing. Bird-safe design is important, but it is not a substitute for responsible siting and scale. A 600+ foot illuminated tower adjacent to an estuary and migratory corridor remains a major ecological hazard, regardless of façade treatments or green roofs, which have been paraded as benefits *post-construction/post-avoidable consequences*.

3. Wind Impacts Have Not Been Adequately Considered in Ecological Terms

The project’s pedestrian wind analysis acknowledges significant changes in local wind conditions resulting from the tower’s height and bulk. *However, wind impacts are framed narrowly as a pedestrian comfort issue rather than an ecological one or acknowledging the rationale for the original building’s size/height.* Tall waterfront towers dramatically alter localized wind behavior through:

- Wind acceleration
- Downdrafts
- Turbulence
- Channeling effects
- Pressure differentials near open waterfronts

These conditions matter not only to people but also to birds navigating coastal air currents during migration. Migratory species—including warblers, swifts, swallows, shorebirds, gulls, terns, and raptors—depend on predictable wind and thermal conditions while traveling along the shoreline. *Introducing multiple supertall structures adjacent to the inlet risks creating hazardous aerodynamic conditions that may:*

- Increase collision risk
- Disrupt flight navigation
- Alter movement patterns
- Reduce habitat usability
- Increase energetic stress during migration

¹ Van Doren, B. M., and K. G. Horton. 2018. A continental system for forecasting bird migration. *Science* 361:1115-1118. doi: 10.1126/science.aat7526 . Van Doren, B. M., and Horton, K. G. Year/s of migration forecast map image. BirdCast, migration forecast map, May (from forecast image lower right corner). University of Illinois, Purdue University, and Cornell Lab of Ornithology. birdcast.org

The FEIS does not meaningfully analyze these ecological wind interactions, despite the project's unprecedented scale along this portion of the waterfront and additional planned development nearby.

4. Open Sky and Waterfront Visibility Are Ecological Resources

The remaining open waterfront around Bushwick Inlet provides more than recreation. Open sky visibility is itself an ecological resource. Migratory birds rely on celestial cues, horizon visibility, magnetic orientation, and open flight pathways during migration. Massive towers concentrated directly along the shoreline interrupt these conditions through:

- Artificial illumination
- Reflective façades
- Vertical obstruction
- Urban canyon effects
- Altered atmospheric conditions

A dense wall of high-rise development along this shoreline would remove open-sky conditions that function as habitat infrastructure for migration. Once built, these impacts are effectively permanent.

5. The Project Contradicts Climate Resilience Goals

Labeling this proposal as climate-conscious does not align with resilient waterfront planning, given the ecological and flood-risk concerns described below. The project would intensify residential density within a vulnerable floodplain while simultaneously degrading natural ecological systems that already provide climate resilience benefits. Without these towers, Bushwick Inlet offers an example of a healthy estuarine ecosystem and open waterfront landscape, which contributes to:

- Storm buffering
- Flood mitigation
- Heat reduction
- Carbon sequestration
- Biodiversity support
- Air quality improvement

Instead of expanding ecological resilience infrastructure, this proposal prioritizes luxury residential towers and waterfront privatization over climate, as outlined in the Brooklyn Comprehensive Plan for the Borough and contradicted by the BP itself. Climate adaptation cannot simply mean engineering taller buildings in flood zones. True resilience requires preserving and restoring functioning ecological systems.

6. Public Land Should Prioritize Ecological Restoration and Public Benefit

This publicly owned waterfront site should be used to expand ecological restoration and public open space—not to enable oversized private development that increases ecological stress and narrows the inlet's remaining habitat function. *This proposal instead advances:*

- Private development of luxury towers (with only secured 25% financial backing—the *legal mandatory*)
- Increased shoreline hardscaping increases ecological stressors
- Insufficient affordable housing commitments relative to the overall scale of market-rate units, especially given the public land disposition.

The public should not lose another waterfront parcel to oversized development that permanently compromises one of the city's remaining estuarine habitats

A more responsible vision would prioritize:

- Expanded public open space, not merely the requirements
- Soft shoreline restoration
- Climate-resilient waterfront ecology
- A well-established business plan and succession plan from the non-profit organization (e.g., The Monitor Museum), forfeiting their air rights for economic gain, in return for a museum the size of the Whitney directly on land that is saturated in toxins.
- Providing additional third spaces for the community, or additional social infrastructure necessary for our society's wellness.
- A responsible vision for this project would account for the designation as being in a FEMA floodplain and for occupying historically industrial waterfront land with documented contamination concerns



Image 1 - Photo of MTA Wash-truck facility garage location depth (shot at 120 mm on iPhone 15 Pro Max); credit, Sarah Roberts

Environmental records and site assessments identify exceedances involving:

- lead
- arsenic
- mercury
- polycyclic aromatic hydrocarbons (PAHs)
- volatile organic compounds (VOCs)
- PFAS compounds, including PFOA
- contaminated groundwater
- soil vapor intrusion concerns

These conditions are compounded by shallow groundwater and coastal flood vulnerability. At the same time, the \$9 million construction of the Inlet park place on Franklin St, created a two-fold approach to restoring and returning the land to the public (as a park). Bushwick Inlet's wetlands and shoreline habitats currently provide measurable climate resiliency functions through:

- storm surge attenuation
- sediment stabilization
- stormwater retention
- pollutant filtration
- carbon sequestration
- biodiversity support
- air quality improvement

Scientific literature and planning documents consistently recognize tidal wetlands as critical infrastructure for urban coastal adaptation. Wetland habitat loss to private development directly undermines long-term borough-wide resiliency objectives. The project proposal, therefore, presents a contradiction between stated climate-resiliency goals and the actual environmental consequences of large-scale waterfront intensification in a vulnerable estuarine floodplain.



IMAGE 2- 3 NEW PARK PARCEL (APRIL 2026) SPOTTED SANDPIPER AT MOTIVA PARCEL, 4/29/26, 10 AM

7. The Environmental Review Fails to Fully Address Cumulative Ecological Harm

The FEIS analyzes many impacts in isolation while minimizing cumulative ecological burden. The combined impacts of the following have not been adequately ***evaluated together*** as a ***unified threat*** to migratory species and estuarine function:

- Tower height
- Artificial nighttime illumination
- Reflective façades
- Wind alteration
- Increased density
- Habitat fragmentation
- Shoreline hardening
- Humans' activity intensity
- Construction disturbance, or the "unavoidable impacts."

This omission is especially concerning given the regional decline in migratory bird populations and increasing scientific recognition of urban waterfronts as critical biodiversity infrastructure.

REQUESTS OF CITY COUNCIL

Based on these concerns, I respectfully urge decision-makers to:

Vote against the Monitor Point rezoning and related land use changes. We need deeply affordable housing, but NOT on wetlands that are irreplaceable. Oppose the transfer of air rights for a museum acting as a façade for a developer to greenwash and take the community captive, creating significant harm to the ecological and atmospheric conditions along Bushwick Inlet.

Bushwick Inlet is more than a development site—it is a living estuary and a migratory corridor. Decisions made here will shape not only the skyline but also the long-term viability of urban wildlife and the ecological future of this shoreline. If this project is approved, it will create a precedent for where and what type of land we build on. Ultimately, it will acknowledge that New Yorkers-- **human life--** are negotiable at the sake of capital, as the MTA acknowledged at the May 27, 2026, hearing, where Council Member Restler queried the ultimate goal of the MTA (Sean stated that their ultimate end goal was to acquire the greatest amount of capital possible in this deal). This plan is a bad deal from two consistently misbehaving actors—Gotham Org and the MTA, who continue to create challenges for the people who live or work in our district.

As Council Member Restler says, "public land must be for the public good." We KNOW that these units may change the lives of a small sliver of the millions of people affected by the monopolies created by the housing developers like Gotham Org, who merely want to reap the fiscal benefit to line their own corporate interests.

Thank you for your time and consideration of the future of Greenpoint's waterfront and its community members.

Sincerely,

[Sarah Roberts, MS, Ed.](#)

Lorimer St, Brooklyn, NY 11222

BrooklynBirdLady@gmail.com

[The Wild Bird Fund](#) Educator and NYSDEC Class I Licensed Wildlife Rehabilitator (Birds), Community Organizer with Bushwick Inlet Park's [Save the Inlet Campaign](#)

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Brooklyn Borough President Antonio Reynoso

March 2026 ULURP Public Hearing

Agenda Item#3: Monitor Point

Oppositional Testimony of Sarah J Roberts of Lorimer St, Brooklyn, NY

March 13, 2026

Good afternoon, BBP Office Land Use Committee and Borough President Reynoso:

A note to the reader:

The following has been added to my testimony for the Brooklyn Borough President's ULURP testimony. References to materials, quotes, or sources are embedded as hyperlinks. Since my testimony to [Community Board 1](#) in February 2026, I have new concerns.

DEVELOPER'S CHARACTER AND ETHICS

Regarding the assertions regarding the [developer's character](#) within the [community](#), as well as their strategies of obfuscation—namely, their avoidance of community inquiries and reliance on selectively presented full renderings of the proposed building.

Regarding character concerns, over the past few weeks, a website has emerged impersonating Save the Inlet [dot] org and advocating for the "[restoration of Bushwick Inlet](#)." The Save the Inlet community group's failure to register multiple domains led to a misleading website intended to appear as a sabotaged action by Gotham. (When you type "SavetheInlet" to auto-complete in a browser, the default domain is "[dot] com." The hidden owner of [this](#) site (owners as of 2025) redirects "savetheinlet.com" to <https://www.restorebushwickinlet.com/home>; a PDF of the website is included in the Appendices.

GREENWASHING/DEIS DATA SETS

Claims related to native plant propagation and land maintenance at the soon-to-open Bushwick Inlet Park Motiva Parcel are factual due to the efforts of land management of North Brooklyn Parks Alliance and the Friends of Bushwick Inlet Park on opened parcels, and were part of the planned Capital project for the [Motiva Passive Seating](#). Additionally, the park's delay was due to the [project's focus on climate resilience](#).

Preservation of our marine habitat is essential for biodiversity and directly benefits the neighborhood: an inlet with thriving wetlands directly supports the protection of the many human communities facing challenges to coastal resiliency from rising sea levels. Action is needed now to defend this irreplaceable ecological resource, home to a diverse population of wildlife from the sky to the water. Bushwick Inlet is also a crucial habitat for bird species, whether resident, breeding, or migratory. NYC is under the Atlantic Flyway, meaning our open spaces are more important now than ever before, as populations are seeing impacts from climate change.

Post-2020 policy amendments now **require** compliance with Gotham's Bird Safe building standards; however, they fail to address the overall role of impact of birds on buildings, as well as the role of [nighttime illumination](#) from these structures, which will adversely affect species, as [light pollution](#) is well-documented to [disrupt nocturnal bird behavior](#) and impact marine life.

The absence of data on threatened and endangered species, well documented on Citizen Science platforms iNaturalist and [eBird.org](#) in Gotham, is deeply concerning, especially given the various populations documented near the Inlet. I am currently a staff member at NYC's only wild bird rehabilitation center, The Wild Bird Fund, where, in 2026, on our busiest day, we admitted 115 birds for care and saw over 13,000 patients. While the City Council created provisions for [bird-safe buildings](#) adopted for new construction, we're still seeing a decline in bird populations for myriad reasons, but human behavior is the key driver and occurring at an alarming rate, calling for "[urgent conservation action](#)."

Relevant to the Monitor Point, low-altitude dusk and dawn migrants such as the American Woodcock will inevitably suffer and die from neurological trauma from colliding with glass. The only digital record of this species (AWC) in the Inlet came from a well-known birder, who reported that the Woodcock was found dead, [likely from a collision](#). While many different causes afflict our patients, the primary cause is collision. Humans have context for glass; birds do not. 230+ birds pass through the Atlantic flyway and often stopover in NYC— **if** they successfully navigate our landscape of reflective glass. The Inlet is one of the spaces that offer them respite, and is one of the last remaining estuaries on the East River.

[Killdeer](#), which nests along the shore and on neighboring parcels (and just returned to nest this past week during the warm weather). These birds are impacted by not only stationary buildings (bird-safe materials are only required for 70'f high (where some [species migrate at heights as low as 500'f](#)), to construction and the "unavoidable" consequences (e.g., [pesticides](#), stationary and moving objects such as windows or vehicles, [contamination of food resources](#)) of [building near these seasonal nesting sites](#) are directly cited by scientists as the many reasons this species distribution is declining.

TOXICITY-BURDENED LAND

Gotham acknowledges ongoing land erosion and contamination issues, evidenced by their [Brownfield](#) Remediation Application [and hearing](#). The proposed residential development—particularly affordable housing units—may disproportionately impact populations already vulnerable to [environmental inequities](#) and systemic racism. The development's structural design further increases risk, as the affordable units are more susceptible to evacuation barriers

during extreme weather events. As early as [2013, Columbia University research](#) found that updated FEMA flood maps failed to incorporate scientifically [predicted sea-level rise levels](#). Additionally, drilling to install building foundations raises concerns about destabilizing adjacent land features on the Motiva parcel, including shoreline protections such as riprap, marshlands, and berms, particularly given the area's low-lying, saturated geography and the proximity of the construction activities.

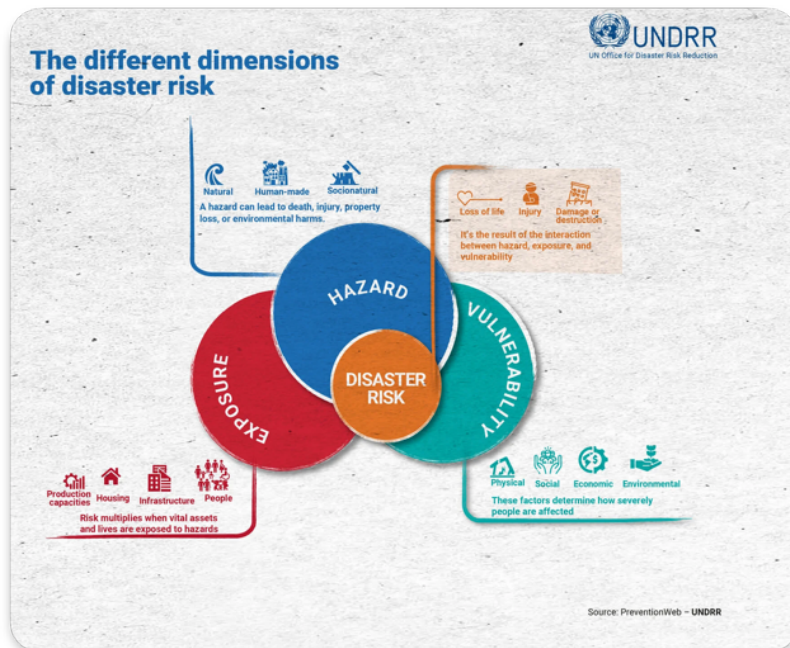


FIGURE 4 PREVENTION WEB- UNDRR (UN OFFICE FOR DISASTER RISK REDUCTION)

CB1 PHASE AND MONITOR MUSEUM BUSINESS PLAN

At the local level (CB1), over 5,000 community members have signed a detailed petition engaging in discourse about the project's negative impacts and green-washed claims. The Land Use Committee voted unanimously "No with Conditions"; however, CB1's full board approved the application with a "yes, without conditions," [thereby circumventing the commitment to providing deeply affordable housing as outlined in community proposals. Additionally, the CB1 failed to convey that over 5,300 residents had voiced their opposition \("no"\) to using this public land for inequitable housing and a museum, where no community input was offered before an RFP was issued.](#)

Notably, the 40% affordable housing figure publicly promoted by Gotham was not incorporated into their ULURP submission and remains contingent upon securing public financing, which has yet to be finalized per the Zoning Portal documentation. CB1's Land Use Committee confirmed with HPD that it had received only an application, a fact acknowledged during the January 20, 2026, hearing, when Gotham's president reluctantly conceded this point. Furthermore, Gotham's financial contributions to the North Brooklyn Park Alliance serve to further fragment community cohesion and undermine collective interests.

The Brooklyn Chamber of Commerce has expressed support; however, questions remain regarding the future of the Monitor Museum. As neighbors of the existing Monitor Point Museum, they lack the operational capacity to administer a facility of the proposed scale, equivalent to the Whitney Museum expansion's square footage. The current proposal appears to lack a viable business plan or a clear articulation of how the space will serve the greater community's interests, especially given the community's lack of support for Gotham/Monitor Museum in the petition, which garnered [only approximately 480 signatures](#). Moreover, this is the **third** institution to bear homage to the [USS Monitor](#)—the necessity and strategic planning for subsequent succession are unclear.

ASKS OF BOROUGH PRESIDENT

Based on the issues outlined herein, I respectfully request that the Brooklyn Borough President and the New York City Planning Commission:

- Vote **NO** on the Monitor Point upzoning of the rezoned land located at 40 Quay Street;
- Enforce the completion of Bushwick Inlet Park as mandated in the 2005 Greenpoint-Williamsburg Rezoning;
- Direct the City to evaluate alternative development plans that prioritize 100% affordable housing on publicly owned land within this community;
- Commission an independent assessment of land alienation concerns pertaining to 56 Quay Street prior to any further approvals;
- Require Gotham Organization to produce comprehensive, photorealistic architectural renderings of the proposed development for public review before proceeding with any additional approvals, explicitly acknowledging the opacity observed in the current public review process as a significant factor against approval. Please see "Drawings" in the DEIS, or refer to their provision of renderings [on Yimby.com](#).

Sincerely,

Sarah Roberts, *MS Ed., NYS DEC- Licensed Wildlife Rehabilitator*

Lorimer St, Brooklyn, NY | *Affiliations:* Save the Inlet, Wild Bird Fund

Appendix A: Juvenile and Adult Killdeer adjacent to Inlet; June 2025 (photographed by me)



Appendix B- Testimony Provided to CB1

Brooklyn Community District 1
435 Graham Avenue, Brooklyn, NY 11211

Dear Members of Brooklyn Community District 1

I am Sarah Roberts, and I attended the June 10th CB1 Board Meeting at capacity. Thank you for your service and dedication to our community. In the future, highly contested topics or projects (including meetings that have been rescheduled) should maintain their agenda to ensure community members of each side can participate fully. These meetings are open to the public and are not predictable regarding attendance. However, the attendance at the Monitor Point meeting bordered on danger due to the occupancy, creating risk for the board, meeting participants, and constituents; moreover, folks could not participate as we were limited by groups or individuals entirely.

As a proud queer individual navigating chronic illness, Autism, and ADHD, I recognize the unique challenges that people like me face, especially regarding climate change and access to safe green spaces—issues highlighted by respected organizations like the UN and the National Parks Conservation Association.

Birding is a passion of mine, and I've dedicated countless hours to this passion. I serve as a New York State Department of Environmental Conservation Class I Wildlife Rehabilitator and volunteer with the Wild Bird Fund, NYC's only wild bird rehabilitation center. This past year, we encountered our busiest day when we took in 110 birds, and last year alone, we provided care for over 11,000 birds.

Regarding the 40 Quay project, we must consider the dire consequences for low-altitude migratory birds like the American Woodcock. These birds will suffer tremendously and die from neurological trauma due to collisions with glass—a hazard they cannot comprehend. The only recorded instance of this species in the Inlet was documented by a well-known birder who found a Woodcock dead, likely from such a collision. In April 2025, the highest altitude recorded for migrating birds was 1,800 feet, according to Kings County BidCast data. Unfortunately, collisions remain the primary threat to these birds despite new building law legislation. While humans can grasp the dangers of glass, birds cannot navigate our reflective landscapes. Over 230 species of birds pass through the Atlantic flyway, often seeking refuge in NYC—if they can survive our urban environment. The Inlet provides critical respite, supporting nesting and fishing for threatened and vulnerable bird species. While the NYC Council seeks to advance state-wide legislation, the reality is that bird-friendly building practices have become necessary by legal default in new construction. The impact of collisions is often fatal— as documented by BBC Toronto's coverage of bird collisions and the urgent need to combat staggering bird losses. This is not a problem we can afford to ignore.

Having lived in Greenpoint with my partner, a fifth-generation resident, for two years, I have come to appreciate the unique value of the Inlet and the immense effort our community has invested in its preservation. In 2002, a resident participating in the Greenpoint Environmental History Project through the Brooklyn Public Library Center for Brooklyn History reached out to the City, asking how it planned to protect the 65+ migratory species studied in the Inlet from 1995 to 2001. The depth and detail of this data collection is striking, especially since it predates digital birding projects such as Cornell's eBird, which now records over 135 species.

Aquatic Habitats and Species of Bushwick Inlet

Bushwick Inlet is not just a body of water but a vital habitat for a diverse assemblage of aquatic life. It is a shallow, tidal embayment on the East River in Greenpoint/Williamsburg, Brooklyn. The Inlet includes intertidal flats and remnant salt marsh vegetation that once extended over the surrounding landscape. Today, these littoral habitats support a diverse assemblage of aquatic life. Local surveys and environmental reviews list numerous resident and transient marine species. For example, a New York City planning study notes that "*Fish with the potential to occur in Bushwick Inlet include winter flounder, scup, white perch (i.e., juveniles inhabit creeks and inshore areas until they are about one year old).*" Likewise, broad inventories of the East River strait document over 50 fish species, including saltwater and brackish-water forms. Common fishes captured in recent East River studies include *striped bass, bluefish, summer flounder, scup, tautog, oyster toadfish, and American eel*. These species use the Inlet and adjacent shoals for foraging, refuge, or spawning. Smaller forage fishes (Atlantic silversides, bay anchovy, menhaden, killifish) are also abundant and form the base of the food web.

Beyond fish, the Inlet hosts important invertebrates and shellfish. Blue crabs and other crustaceans forage on the mudflats and marsh edges, and juvenile lobsters and native clams likely use these nearshore habitats when water quality permits. Historically, the East River supported vast oyster reefs; colonial-era accounts note the harbor's oyster beds were among the world's largest. Today, restoration projects (e.g., the Billion Oyster Project) are re-establishing oysters in Bushwick Inlet. Recent monitoring found planted oyster clusters in Bushwick Inlet to be "healthy and doing well," with oysters growing beyond their cages.

Oysters and mussels create a three-dimensional reef habitat that shelters fish, crabs, and juvenile shellfish. The Inlet's mosaic of shallow water, submerged structure, and marsh vegetation forms a critical nursery and feeding habitat for many species in the river.

Migratory and diadromous species rely on the Inlet as a passage or staging area. The East River is an estuarine arm of the Hudson; it serves as a corridor for anadromous fishes moving between the ocean and upriver spawning grounds. For example, adult *striped bass, Atlantic herring, blueback herring, and American eel* transit these waters. Critically, both federally endangered sturgeon species use the East River as a migratory route: NOAA notes that Atlantic sturgeon (subadults and adults) "have been documented using [the East River] to move between the Hudson River and western Long Island Sound," and shortnose sturgeon are also presumed to forage here when food is available. **By extension, Bushwick Inlet's quiet coves likely provide refuge or staging for these migrants.** In addition, numerous waterbirds and wading birds use the inlet shoreline: conservation groups describe Bushwick Inlet as "a rare natural embayment, a migratory bird stops and ecological treasure" in New York City. In sum, the Inlet's biodiversity includes local nursery fishes (white perch, winter flounder, menhaden, silversides, etc.), predatory sportfish (striped bass, bluefish, tautog, etc.), shellfish (oysters, clams, blue crabs), and migratory species (herring, eel, sturgeon, shorebirds) – all of which depend on the Inlet's estuarine habitat.

Nursery and Migratory Functions

Estuarine wetlands and shallows like Bushwick Inlet are well-known nursery grounds for juvenile aquatic life. Studies confirm that the East River strait supports the juvenile stages of many species. In 2019, a community science survey found larval and juvenile fish of species such as Atlantic silverside, Atlantic menhaden, mummichog, and striped killifish in East River waters, suggesting local spawning or retention of young fish. The same study concluded that *"most documented East River fish species probably use the strait as a nursery."* In Bushwick Inlet specifically, the City's environmental impact statement notes that juveniles of winter flounder, scup, and white perch inhabit its sheltered shallows. These estuarine-born juveniles then grow in the Inlet's rich feeding grounds before moving into deeper waters. The Inlet helps sustain the broader New York Harbor ecosystem by fostering the high survival of juvenile fish and shellfish.

Likewise, the Inlet is a stopover or corridor for migratory aquatic species. The East River's tidal flow and high productivity mix attract anadromous migrants. In addition to sturgeon (above), diadromous fishes such as Atlantic herring and striped bass pass through these waters when migrating between Long Island Sound, Upper New York Bay, and spawning rivers. Seasonal runs of river herring (alewife and blueback herring), American shad, and river eels historically would enter this reach. Though less studied, adult horseshoe crabs may also wander into the back-bays. By preserving free exchange between the Inlet and East River, Bushwick Inlet serves a connectivity function for these migrations.

Ecosystem Services: Flood Control, Filtration, Carbon Sequestration

The Bushwick Inlet wetlands and shoreline also perform crucial ecosystem services: tidal marshes and mudflats around the inlet act as **natural buffers**. Salt marsh grasses (*Spartina* spp.) stabilize sediments and absorb wave energy. This helps attenuate storm surges and sequesters floodwaters; New York planning documents emphasize that wetlands *"control floods, capture stormwater runoff, and moderate storm surges."* Because Bushwick Inlet lies within the FEMA 100-year floodplain, any loss of its marshy shoreline would directly increase flood risk to the surrounding neighborhood. As Friends of Bushwick Inlet Park warns, building high-rises in this flood-prone area *"will work against nature-based flood defenses."* Protecting the Inlet's wetlands is thus a cheap, resilient way to mitigate flooding in North Brooklyn.

Wetland vegetation and shellfish reefs also **improve water quality**. Marsh plants filter sediments and nutrients from upland runoff, while oysters and clams are living water filters. NOAA notes that a single oyster can filter ~50 gallons of water daily, removing algae and clarifying water. The improved clarity then allows submerged plants to grow, enhancing habitat for juvenile crabs and fish. Tidal wetlands in the East River have been shown to remove pollutants; as a New York State Agency report states, *"tidal wetlands provide...pollutant filtration"* in addition to habitat. The intact Inlet system helps trap and process urban runoff before it harms downstream waters.

Finally, wetlands are significant **carbon sinks**. Salt marsh soils accumulate and store organic carbon from decaying plant matter. In official planning language, New York City acknowledges that wetlands *"improve water quality and sequester carbon dioxide."* Although small in area, the Bushwick Inlet marsh (and planned wetland restorations) contribute to this "blue carbon" storage. Preserving or restoring *Spartina* salt marsh here thus has climate benefits as well as biodiversity value.

Vulnerabilities to Urban Development

All of the above values hinge on preserving the Inlet's natural habitat. Urban waterfront development poses grave threats. Filling, bulkheading, or shading the Inlet will destroy its marsh and shallow habitats. Hard structures eliminate the "graded basins" and gently sloping shore needed for salt marsh. Juvenile fish lose nursery grounds without marsh vegetation or oyster reefs, and the floodplain loses its sponge-like protection. Moreover, increased impervious surfaces and sewage overflows from new construction would worsen pollution in this already-stressed waterbody. The development would also disrupt currents and water exchange in the Inlet, potentially creating stagnant zones or hypoxia.

The cumulative effect is already clear in much of the East River: a Columbia University study notes that extensive bulkheaded shoreline has "deficient...the shallow and structured habitat common to estuary shorelines," causing the fish community to shift toward open-water species like anchovies and herring. Bushwick Inlet and its remnant wetlands are a rare exception – and thus are disproportionately important. For example, a U.S. Army Corps restoration plan calls for creating 1.6 acres of new salt marsh and softening over 2,500 feet of shoreline along the East Riverfront, explicitly to help fish, crab, and crustation habitat. Conversely, removing or degrading the Inlet's natural edges would directly undermine these goals.

Finally, the loss of this habitat threatens protected species. As noted, both Atlantic and shortnose sturgeon use the East River; destroying the Inlet could block a key foraging refuge for these endangered fish. Likewise, millions of migratory birds use New York's estuaries each year—eliminating even a small stopover habitat like Bushwick Inlet would degrade the flyway.

Bushwick Inlet and its adjacent East River stretch harbor rich estuarine biodiversity – from juvenile white perch and flounder to gamefish, crabs, oysters, and migratory sturgeon – and provide vital ecosystem services (flood control, water purification, carbon storage). These functions will be **severely impaired** by large-scale development on the waterfront. Given the scientific evidence, I strongly urge that any proposed development preserve and enhance the Inlet's natural habitats. Protection of Bushwick Inlet is essential for local wildlife and fisheries, community safety (storm protection), and regional ecological health.

Protecting the Inlet transcends mere housing allocation; it's a matter of using public land for the greater good. The stakes are high—this isn't just about wildlife but our community's shared environment and future. Since the 2005 rezoning, we've seen skyrocketing rents while supply has increased steadily. The situation in Greenpoint/Williamsburg demonstrates that the so-called "trickle-down real estate" model fails to deliver proper affordable housing. Sacrificing this vital land for the bare minimum of affordable units in a flood zone is not just embarrassing;

it's a betrayal of our community's trust and a façade that masks yet another broken promise to the residents of Greenpoint. Let's stand together to advocate for a future where our community and its wildlife can thrive. We live in a precarious time where our ecosystem and needs for housing (and infrastructure) are combatting one another for prioritization-- the City must evaluate a long-term plan of open lots, contextual housing, and open spaces that are also needed in other neighborhoods.

Sincerely,

Sarah Roberts

Sincerely,

Sarah Roberts, MS, Edu. (She/Her/They) —why include this?

NYSDEC Class I Licensed Wildlife Rehabilitator - *Small Mammals and Birds*, Volunteer with [Wild Bird Fund](#)

Sources: Peer-reviewed and government studies of the East River and Bushwick Inlet (EIS documents, ecological surveys, USACE restoration plans, NOAA, and academic reports) and local conservation assessments.

Brooklyn CB1 Land Use Committee

RE: Monitor Point Development Proposal

April 1, 2025

Testimony from Sarah (Meyers) Roberts, Greenpoint resident

First, thank you, Committee members, for serving our community through your work here and on CB1. My name is Sarah; I use she/her/they pronouns. I'm queer, I have a chronic illness, and I have both Autism and ADHD. Organizations like the UN and the National Parks Conservation Association all comment on the additional disparities folks like me experience in relation to climate change and accessing green spaces that are safe.

Birding is one of my special interests, meaning much of my time is devoted to it in some capacity. I am currently a volunteer with NYC's only wild bird rehabilitation center, The Wild Bird Fund, where, in 2023, on our busiest day was 110 birds being taken in for care, last year we saw over 11,000 birds.

Relevant to the 40 Quay project, low-altitude dusk and dawn migrants such as the American Woodcock will inevitably suffer and die from neurological trauma from colliding with glass. The only digital record of this species in the Inlet was from a well-known birder, noting that the Woodcock was found dead, likely from a collision. Last night, from sunset to sunrise, the greatest altitude recorded for migrating birds was 1,800 ft, according to the Kings County Bird Cast data. While many different causes afflict our patients, the primary cause is collision. Humans have context for glass; birds do not. 230+ birds pass through the Atlantic flyway and often stopover in NYC— if they successfully navigate our landscape of reflective glass. The Inlet is one of the spaces that offer them respite.

I've only lived here for two years, and that's been long enough to learn how special the Inlet is and how much energy the community has put forth to protect it. As part of the Greenpoint Environmental History Project through the Brooklyn Public Library Center for Brooklyn History in 2002, a resident wrote to the city asking how they planned to protect the 65+ migratory species that they studied from 1995-2001 in the Inlet. Committee, please note that this data collection depth is rare, and its' detail is profound given that it's before any digital birding atlas projects like Cornell's eBird, which is used today where the number has also grown to over 135 species.

As a resident who depends on open space for overall well-being, not just for hobbies, it's a lifeline for both the birds and me. Preserving the Inlet is more than redirecting housing needed in other neighborhoods; it's about using public land for public good—and the birds.

Thank you.

Sarah Roberts

eBird Field Checklist

Bushwick Inlet Park (btwn Quay St.-N 9th St.)

Kings, New York, US

ebird.org/hotspot/L2987635

155 species (+18 other taxa) - Year-round,
All years

Date: _____

Start time: _____

Duration: _____

Distance: _____

Party size: _____

Notes:

This checklist is generated with data from eBird (ebird.org), a global database of bird sightings from birders like you. If you enjoy this checklist, please consider contributing your sightings to eBird. It is 100% free to take part, and your observations will help support birders, researchers, and conservationists worldwide.

Go to ebird.org to learn more!

Waterfowl

- ___ Brant *Branta bernicla*
- ___ Canada Goose *Branta canadensis*
- ___ Mute Swan *Cygnus olor*
- ___ Trumpeter Swan *Cygnus buccinator*
- ___ Wood Duck *Aix sponsa*
- ___ Mandarin Duck *Aix galericulata*
- ___ Blue-winged Teal *Spatula discors*
- ___ Northern Shoveler *Spatula clypeata*
- ___ Gadwall *Mareca strepera*
- ___ American Wigeon *Mareca americana*
- ___ Mallard *Anas platyrhynchos*
- ___ American Black Duck *Anas rubripes*
- ___ Mallard x American Black Duck (hybrid) *Anas platyrhynchos x rubripes*
- ___ Mallard/American Black Duck *Anas platyrhynchos/rubripes*
- ___ Greater Scaup *Aythya marila*
- ___ Lesser Scaup *Aythya affinis*
- ___ Greater/Lesser Scaup *Aythya marila/affinis*
- ___ Long-tailed Duck *Clangula hyemalis*
- ___ Bufflehead *Bucephala albeola*
- ___ Common Goldeneye *Bucephala clangula*
- ___ Hooded Merganser *Lophodytes cucullatus*
- ___ Red-breasted Merganser *Mergus serrator*
- ___ Common/Red-breasted Merganser *Mergus merganser/serrator*
- ___ Ruddy Duck *Oxyura jamaicensis*
- ___ duck sp. *Anatidae (duck sp.)*

Pigeons and Doves

- ___ Rock Pigeon *Columba livia*
- ___ Mourning Dove *Zenaidura macroura*

Cuckoos

- ___ Yellow-billed Cuckoo *Coccyzus americanus*

Swifts

- ___ Chimney Swift *Chaetura pelagica*

Hummingbirds

- ___ Ruby-throated Hummingbird *Archilochus colubris*

Rails, Gallinules, and Allies

- ___ American Coot *Fulica americana*

Shorebirds

- ___ Killdeer *Charadrius vociferus*
- ___ American Woodcock *Scolopax minor*
- ___ Spotted Sandpiper *Actitis macularius*
- ___ Solitary Sandpiper *Tringa solitaria*
- ___ Greater Yellowlegs *Tringa melanoleuca*
- ___ Purple Sandpiper *Calidris maritima*
- ___ Least Sandpiper *Calidris minutilla*
- ___ shorebird sp. *Charadriiformes sp. (shorebird sp.)*

Gulls, Terns, and Skimmers

- ___ Bonaparte's Gull *Chroicocephalus philadelphia*
- ___ Laughing Gull *Leucophaeus atricilla*
- ___ Ring-billed Gull *Larus delawarensis*
- ___ American Herring Gull *Larus smithsonianus*
- ___ Great Black-backed Gull *Larus marinus*
- ___ Larus sp. *Larus sp.*
- ___ gull sp. *Larinae sp.*
- ___ Forster's Tern *Sterna forsteri*
- ___ Common Tern *Sterna hirundo*

Grebes

- ___ Horned Grebe *Podiceps auritus*

Loons

- ___ Red-throated Loon *Gavia stellata*
- ___ Common Loon *Gavia immer*

Cormorants and Anhingas

- ___ Great Cormorant *Phalacrocorax carbo*
- ___ Double-crested Cormorant *Nannopterum auritum*

Hérons, Ibis, and Allies

- ___ Black-crowned Night Heron *Nycticorax nycticorax*
- ___ Green Heron *Butorides virescens*
- ___ Great Egret *Ardea alba*
- ___ Great Blue Heron *Ardea herodias*

Vultures, Hawks, and Allies

- ___ Osprey *Pandion haliaetus*
- ___ Cooper's Hawk *Astur cooperii*
- ___ Northern Harrier *Circus hudsonius*
- ___ Bald Eagle *Haliaeetus leucocephalus*
- ___ Red-shouldered Hawk *Buteo lineatus*
- ___ Red-tailed Hawk *Buteo jamaicensis*

Kingfishers

- ___ Belted Kingfisher *Megaceryle alcyon*

Woodpeckers

- ___ Yellow-bellied Sapsucker *Sphyrapicus varius*
- ___ Red-bellied Woodpecker *Melanerpes carolinus*
- ___ Downy Woodpecker *Dryobates pubescens*
- ___ Northern Flicker *Colaptes auratus*

Falcons and Caracaras

- ___ American Kestrel *Falco sparverius*
- ___ Peregrine Falcon *Falco peregrinus*
- ___ falcon sp. *Falco sp.*

Parrots, Parakeets, and Allies

- ___ Budgerigar *Melopsittacus undulatus*
- ___ Monk Parakeet *Myiopsitta monachus*

Tyrant Flycatchers: Pewees, Kingbirds, and Allies

- ___ Eastern Wood-Pewee *Contopus virens*
- ___ Willow Flycatcher *Empidonax traillii*
- ___ Alder/Willow Flycatcher (Traill's Flycatcher) *Empidonax alnorum/traillii*
- ___ Least Flycatcher *Empidonax minimus*
- ___ Empidonax sp. *Empidonax sp.*
- ___ Eastern Phoebe *Sayornis phoebe*
- ___ Ash-throated Flycatcher *Myiarchus cinerascens*
- ___ Eastern Kingbird *Tyrannus tyrannus*

Vireos

- ___ Blue-headed Vireo *Vireo solitarius*
- ___ Eastern Warbling Vireo *Vireo gilvus*
- ___ Red-eyed Vireo *Vireo olivaceus*

Jays, Magpies, Crows, and Ravens

- ___ Blue Jay *Cyanocitta cristata*
- ___ American Crow *Corvus brachyrhynchos*
- ___ Fish Crow *Corvus ossifragus*
- ___ crow sp. *Corvus sp. (crow sp.)*
- ___ Common Raven *Corvus corax*
- ___ crow/raven sp. *Corvus sp.*

Tits, Chickadees, and Titmice

- ___ Black-capped Chickadee *Poecile atricapillus*
- ___ Tufted Titmouse *Baeolophus bicolor*

Martins and Swallows

- ___ Tree Swallow *Tachycineta bicolor*
- ___ Barn Swallow *Hirundo rustica*

Kinglets

- ___ Ruby-crowned Kinglet *Corthylio calendula*
- ___ Golden-crowned Kinglet *Regulus satrapa*

Nuthatches

- ___ White-breasted Nuthatch *Sitta carolinensis*
- ___ Red-breasted Nuthatch *Sitta canadensis*

Treecreepers

- ___ Brown Creeper *Certhia americana*

Wrens

- ___ Northern House Wren *Troglodytes aedon*
- ___ Winter Wren *Troglodytes hiemalis*
- ___ Marsh Wren *Cistothorus palustris*
- ___ Carolina Wren *Thryothorus ludovicianus*
- ___ wren sp. *Troglodytidae sp.*

Starlings and Mynas

- ___ European Starling *Sturnus vulgaris*

Catbirds, Mockingbirds, and Thrashers

- ___ Gray Catbird *Dumetella carolinensis*
- ___ Brown Thrasher *Toxostoma rufum*
- ___ Northern Mockingbird *Mimus polyglottos*

Thrushes

- ___ Eastern Bluebird *Sialia sialis*
- ___ Veery *Catharus fuscescens*
- ___ Swainson's Thrush *Catharus ustulatus*
- ___ Hermit Thrush *Catharus guttatus*
- ___ American Robin *Turdus migratorius*

Waxwings

- ___ Cedar Waxwing *Bombycilla cedrorum*

Old World Sparrows

- ___ House Sparrow *Passer domesticus*

This field checklist was generated using eBird (ebird.org)

Wagtails and Pipits

___ American Pipit *Anthus rubescens*

Finches, Euphonias, and Allies

___ House Finch *Haemorhous mexicanus*

___ Purple Finch *Haemorhous purpureus*

___ Pine Siskin *Spinus pinus*

___ American Goldfinch *Spinus tristis*

___ finch sp. *Fringillidae* sp.

New World Sparrows

___ Chipping Sparrow *Spizella passerina*

___ Clay-colored Sparrow *Spizella pallida*

___ Field Sparrow *Spizella pusilla*

___ American Tree Sparrow *Spizelloides arborea*

___ Fox Sparrow *Passerella iliaca*

___ Dark-eyed Junco *Junco hyemalis*

___ White-crowned Sparrow *Zonotrichia leucophrys*

___ White-throated Sparrow *Zonotrichia albicollis*

___ Vesper Sparrow *Pooecetes gramineus*

___ Savannah Sparrow *Passerculus sandwichensis*

___ Song Sparrow *Melospiza melodia*

___ Lincoln's Sparrow *Melospiza lincolni*

___ Swamp Sparrow *Melospiza georgiana*

___ Eastern Towhee *Pipilo erythrophthalmus*

___ new world sparrow sp. *Passerellidae* sp.

Blackbirds

___ Bobolink *Dolichonyx oryzivorus*

___ Orchard Oriole *Icterus spurius*

___ Baltimore Oriole *Icterus galbula*

___ Red-winged Blackbird *Agelaius phoeniceus*

___ Brown-headed Cowbird *Molothrus ater*

___ Common Grackle *Quiscalus quiscula*

___ blackbird sp. *Icteridae* sp.

Wood-Warblers

___ Ovenbird *Seiurus aurocapilla*

___ Northern Waterthrush *Parkesia noveboracensis*

___ Black-and-white Warbler *Mniotilta varia*

___ Tennessee Warbler *Leiothlypis peregrina*

___ Orange-crowned Warbler *Leiothlypis celata*

___ Nashville Warbler *Leiothlypis ruficapilla*

___ Connecticut Warbler *Oporornis agilis*

___ Common Yellowthroat *Geothlypis trichas*

___ Hooded Warbler *Setophaga citrina*

___ American Redstart *Setophaga ruticilla*

___ Cape May Warbler *Setophaga tigrina*

___ Northern Parula *Setophaga americana*

___ Magnolia Warbler *Setophaga magnolia*

___ Bay-breasted Warbler *Setophaga castanea*

___ Northern Yellow Warbler *Setophaga aestiva*

___ Chestnut-sided Warbler *Setophaga pensylvanica*

___ Blackpoll Warbler *Setophaga striata*

___ Black-throated Blue Warbler *Setophaga caerulescens*

___ Palm Warbler *Setophaga palmarum*

___ Pine Warbler *Setophaga pinus*

___ Yellow-rumped Warbler *Setophaga coronata*

___ Prairie Warbler *Setophaga discolor*

___ Black-throated Green Warbler

Setophaga virens

___ Wilson's Warbler *Cardellina pusilla*

___ new world warbler sp. *Parulidae* sp.

Cardinals, Grosbeaks, and Allies

___ Scarlet Tanager *Piranga olivacea*

___ Northern Cardinal *Cardinalis cardinalis*

___ Rose-breasted Grosbeak *Pheucticus ludovicianus*

___ Indigo Bunting *Passerina cyanea*

___ Dickcissel *Spiza americana*

This field checklist was generated using eBird (ebird.org)

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Bushwick Inlet Park (btwn Quay St.-N 9th St.)

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Kings, New York, United States

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Bird List

Updated ~16 seconds ago

153
All Years **81**
This Year
2026 **47**
This Month
May 2026[Last Observed](#)[First Observed](#)[High Count](#)[Custom Time Period](#) [Sort by](#)

1. **Green Heron** *Butorides virescens*

1

27 May 2026

Steve Chesler

Bushwick Inlet Park (btwn Quay St.-N 9th St.)

2. **Killdeer** *Charadrius vociferus*

1

26 May 2026

Sara Baumberger

Bushwick Inlet Park (btwn Quay St.-N 9th St.)

3. **Spotted Sandpiper** *Actitis macularius*

1

26 May 2026

Sara Baumberger

Bushwick Inlet Park (btwn Quay St.-N 9th St.)

4. **Canada Goose** *Branta canadensis*

5

22 May 2026

Sarah Roberts

Bushwick Inlet Park (btwn Quay St.-N 9th St.)

5. **Mourning Dove** *Zenaida macroura*

6

22 May 2026

Sarah Roberts

Bushwick Inlet Park (btwn Quay St.-N 9th St.)

6. **Laughing Gull** *Leucophaeus atricilla*

3

22 May 2026

Sarah Roberts

Bushwick Inlet Park (btwn Quay St.-N 9th St.)



7. **Double-crested Cormorant** *Nannopterum auritum*

1 📅 22 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

8. **Osprey** *Pandion haliaetus*

1 📅 22 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

9. **Gray Catbird** *Dumetella carolinensis*

1 📅 22 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

10. **House Sparrow** *Passer domesticus* *

13 📅 22 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

11. **Song Sparrow** *Melospiza melodia*

1 📅 22 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

12. **Red-winged Blackbird** *Agelaius phoeniceus*

1 📅 22 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

13. **Common Grackle** *Quiscalus quiscula*

1 📅 22 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

14. **Rock Pigeon** *Columba livia* *

2 📅 19 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

15. **European Starling** *Sturnus vulgaris* *

15 📅 19 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

16. **Northern Mockingbird** *Mimus polyglottos*

1 📅 19 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

17. **American Robin** *Turdus migratorius* 🟢

8 📅 19 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

18. **Great Egret** *Ardea alba*

1 📅 19 May 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



19. **Mallard** *Anas platyrhynchos*
2 📅 18 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

20. **American Black Duck** *Anas rubripes*
2 📅 18 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

21. **Red-tailed Hawk** *Buteo jamaicensis* 🗨️
1 📅 18 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

22. **American Kestrel** *Falco sparverius* 🗨️
1 📅 18 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

23. **Chimney Swift** *Chaetura pelagica*
3 📅 17 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

24. **Brant** *Branta bernicla*
13 📅 13 May 2026 👤 Anonymous eBirder
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

25. **American Herring Gull** *Larus smithsonianus*
2 📅 13 May 2026 👤 Joe Schiavone
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

26. **American Crow** *Corvus brachyrhynchos* 🗨️
24 📅 11 May 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)


27. **House Finch** *Haemorhous mexicanus* *
1 📅 11 May 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

28. **White-throated Sparrow** *Zonotrichia albicollis*
1 📅 11 May 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

29. **Chipping Sparrow** *Spizella passerina*
1 📅 11 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

30. **White-crowned Sparrow** *Zonotrichia leucophrys*
1 📅 11 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



31. **Savannah Sparrow** *Passerculus sandwichensis*
1 📅 11 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
32. **Ovenbird** *Seiurus aurocapilla*
1 📅 11 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
33. **Common Yellowthroat** *Geothlypis trichas*
1 📅 11 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
34. **Black-and-white Warbler** *Mniotilta varia*
2 📅 10 May 2026 👤 Anonymous eBirder
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
35. **Hooded Warbler** *Setophaga citrina* 
2 📅 10 May 2026 👤 Anonymous eBirder
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
36. **American Redstart** *Setophaga ruticilla*
1 📅 10 May 2026 👤 Anonymous eBirder
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
37. **Northern Parula** *Setophaga americana*
2 📅 10 May 2026 👤 Anonymous eBirder
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
38. **Magnolia Warbler** *Setophaga magnolia*
1 📅 10 May 2026 👤 Anonymous eBirder
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
39. **Swamp Sparrow** *Melospiza georgiana*  
1 📅 10 May 2026 👤 Brian Tomsu
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
40. **Gadwall** *Mareca strepera*
1 📅 9 May 2026 👤 Pu C
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
41. **Purple Sandpiper** *Calidris maritima*
1 📅 9 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
42. **Common Tern** *Sterna hirundo*
2 📅 9 May 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



43. **Brown-headed Cowbird** *Molothrus ater*
1 📅 7 May 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
44. **Nashville Warbler** *Leiothlypis ruficapilla*  
1 📅 7 May 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
45. **Red-breasted Merganser** *Mergus serrator*
1 📅 6 May 2026 👤 Jacob Apkon
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
46. **Northern House Wren** *Troglodytes aedon*
1 📅 4 May 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
47. **Great Black-backed Gull** *Larus marinus*
1 📅 1 May 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
48. **Ring-billed Gull** *Larus delawarensis*
4 📅 30 Apr 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
49. **Eastern Towhee** *Pipilo erythrophthalmus*
1 📅 30 Apr 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
50. **Bufflehead** *Bucephala albeola*
2 📅 25 Apr 2026 👤 Michael Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
51. **Northern Flicker** *Colaptes auratus*
1 📅 25 Apr 2026 👤 Michael Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
52. **Blue Jay** *Cyanocitta cristata*
3 📅 25 Apr 2026 👤 Michael Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
53. **Field Sparrow** *Spizella pusilla*
1 📅 25 Apr 2026 👤 Michael Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
54. **Dark-eyed Junco** *Junco hyemalis*
3 📅 25 Apr 2026 👤 Michael Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



55. **Palm Warbler** *Setophaga palmarum*
1 📅 25 Apr 2026 👤 Michael Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
56. **Yellow-rumped Warbler** *Setophaga coronata*
1 📅 25 Apr 2026 👤 Michael Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
57. **Northern Cardinal** *Cardinalis cardinalis*
2 📅 25 Apr 2026 👤 Michael Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
58. **Hermit Thrush** *Catharus guttatus*
1 📅 19 Apr 2026 👤 Eliot Thompson
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
59. **Ruby-crowned Kinglet** *Corthylio calendula* 
1 📅 14 Apr 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
60. **Brown Creeper** *Certhia americana*
1 📅 12 Apr 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
61. **Northern Harrier** *Circus hudsonius*
1 📅 7 Apr 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
62. **Yellow-bellied Sapsucker** *Sphyrapicus varius*
1 📅 5 Apr 2026 👤 Anonymous eBirder
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
63. **Eastern Phoebe** *Sayornis phoebe*  
1 📅 4 Apr 2026 👤 Brian Tomsu
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
64. **Cooper's Hawk** *Astur cooperii*
1 📅 4 Apr 2026 👤 landry birds
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
65. **Downy Woodpecker** *Dryobates pubescens*
1 📅 4 Apr 2026 👤 landry birds
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
66. **Golden-crowned Kinglet** *Regulus satrapa*
1 📅 4 Apr 2026 👤 landry birds
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



67. **Fox Sparrow** *Passerella iliaca*
1 📅 3 Apr 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

68. **Mute Swan** *Cygnus olor* *
1 📅 22 Mar 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

69. **Trumpeter Swan** *Cygnus buccinator* 🗨️ 📷
1 📅 22 Mar 2026 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

70. **Bald Eagle** *Haliaeetus leucocephalus* 🗨️
2 📅 21 Mar 2026 👤 Austin Johnson
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

71. **Greater Scaup** *Aythya marila*
4 📅 16 Mar 2026 👤 Sara Baumberger
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

72. **Ruddy Duck** *Oxyura jamaicensis*
1 📅 13 Mar 2026 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

73. **Wood Duck** *Aix sponsa*
1 📅 10 Mar 2026 👤 Nate L-S
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

74. **Lesser Scaup** *Aythya affinis*
1 📅 8 Mar 2026 👤 Maddy P
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

75. **Hooded Merganser** *Lophodytes cucullatus*
2 📅 8 Mar 2026 👤 landry birds
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

76. **Northern Shoveler** *Spatula clypeata*
1 📅 6 Mar 2026 👤 Caroline Quinn
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

77. **Red-throated Loon** *Gavia stellata* 🗨️ 📷
1 📅 28 Feb 2026 👤 ddebied.
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

78. **Horned Grebe** *Podiceps auritus*
1 📅 26 Jan 2026 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)












































79. **Common Raven** *Corvus corax*
1 📅 22 Jan 2026 👤 Dave Spangenburg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
80. **Carolina Wren** *Thryothorus ludovicianus*
1 📅 22 Jan 2026 👤 Austin Johnson
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
81. **Common Loon** *Gavia immer*
1 📅 10 Jan 2026 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
82. **Peregrine Falcon** *Falco peregrinus*
1 📅 21 Dec 2025 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
83. **Orange-crowned Warbler** *Leiothlypis celata* 
1 📅 11 Dec 2025 👤 Austin Johnson
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
84. **American Goldfinch** *Spinus tristis*
2 📅 1 Dec 2025 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
85. **Great Blue Heron** *Ardea herodias*  
1 📅 20 Nov 2025 👤 ddebied.
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
86. **Belted Kingfisher** *Megasceryle alcyon*
1 📅 12 Nov 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
87. **Cedar Waxwing** *Bombycilla cedrorum*
2 📅 3 Nov 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
88. **Lincoln's Sparrow** *Melospiza lincolnii*
1 📅 1 Nov 2025 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
89. **Yellow-billed Cuckoo** *Coccyzus americanus*  
1 📅 28 Oct 2025 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
90. **Winter Wren** *Troglodytes hiemalis*
2 📅 23 Oct 2025 👤 landry birds
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)





91. **Black-crowned Night Heron** *Nycticorax nycticorax*
1 📅 22 Oct 2025 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
92. **Brown Thrasher** *Toxostoma rufum*
1 📅 16 Oct 2025 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
93. **Red-bellied Woodpecker** *Melanerpes carolinus* 🗨️
1 📅 11 Oct 2025 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
94. **Baltimore Oriole** *Icterus galbula*
1 📅 11 Oct 2025 👤 Bianca Bello
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
95. **Blackpoll Warbler** *Setophaga striata*
2 📅 11 Oct 2025 👤 Bianca Bello
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
96. **Black-throated Blue Warbler** *Setophaga caerulescens*
1 📅 7 Oct 2025 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
97. **Tennessee Warbler** *Leiothlypis peregrina*
1 📅 5 Oct 2025 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
98. **Scarlet Tanager** *Piranga olivacea*
1 📅 1 Oct 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
99. **Bay-breasted Warbler** *Setophaga castanea* 🗨️
1 📅 30 Sep 2025 👤 Sarah Roberts
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
100. **Clay-colored Sparrow** *Spizella pallida* 🗨️
1 📅 23 Sep 2025 👤 Paul Saraceni
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
101. **Northern Yellow Warbler** *Setophaga aestiva*
1 📅 18 Sep 2025 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
102. **Ruby-throated Hummingbird** *Archilochus colubris*
1 📅 11 Sep 2025 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)




















































103. **Wilson's Warbler** *Cardellina pusilla* 
1  11 Sep 2025  Al Duvall
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
104. **Red-eyed Vireo** *Vireo olivaceus*
1  2 Sep 2025  Greg Thornberg
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
105. **Northern Waterthrush** *Parkesia noveboracensis* 
1  1 Sep 2025  Christine Gu
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
106. **Forster's Tern** *Sterna forsteri*
1  27 Aug 2025  Jim Coogan
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
107. **Red-breasted Nuthatch** *Sitta canadensis*
1  27 Aug 2025  Greg Thornberg
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
108. **Solitary Sandpiper** *Tringa solitaria*
1  27 Aug 2025  Al Duvall
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
109. **Cape May Warbler** *Setophaga tigrina*
1  27 Aug 2025  Al Duvall
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
110. **Greater Yellowlegs** *Tringa melanoleuca*  
1  16 Aug 2025  Sarah Roberts
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
111. **Barn Swallow** *Hirundo rustica*
2  16 Aug 2025  Sarah Roberts
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
112. **Tree Swallow** *Tachycineta bicolor*
1  6 Aug 2025  Sarah Roberts
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
113. **Fish Crow** *Corvus ossifragus*
2  1 Jul 2025  Sarah Roberts
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
114. **Willow Flycatcher** *Empidonax traillii* 
1  11 Jun 2025  Nate L-S
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



115. **Eastern Wood-Pewee** *Contopus virens*
1 📅 2 Jun 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
116. **Least Sandpiper** *Calidris minutilla*
1 📅 24 May 2025 👤 landry birds
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
117. **Least Flycatcher** *Empidonax minimus*
1 📅 19 May 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
118. **Blue-headed Vireo** *Vireo solitarius*
1 📅 19 May 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
119. **Orchard Oriole** *Icterus spurius* 
1 📅 23 Apr 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
120. **Pine Warbler** *Setophaga pinus*  
1 📅 17 Apr 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
121. **Vesper Sparrow** *Pooecetes gramineus* 
1 📅 16 Apr 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
122. **American Coot** *Fulica americana*
1 📅 11 Apr 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
123. **Red-shouldered Hawk** *Buteo lineatus*
1 📅 25 Dec 2024 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
124. **American Wigeon** *Mareca americana*
2 📅 22 Dec 2024 👤 Paul Sweet
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
125. **Black-capped Chickadee** *Poecile atricapillus*
1 📅 8 Nov 2024 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
126. **Eastern Bluebird** *Sialia sialis*
5 📅 4 Nov 2024 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



127. **Indigo Bunting** *Passerina cyanea*  17 Oct 2024  Greg Thornberg
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
128. **Prairie Warbler** *Setophaga discolor*  9 Sep 2024  Al Duvall
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
129. **Black-throated Green Warbler** *Setophaga virens*  9 Sep 2024  Al Duvall
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
130. **Veery** *Catharus fuscescens*  13 May 2024  Greg Thornberg
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
131. **Eastern Kingbird** *Tyrannus tyrannus*  9 May 2024  Greg Thornberg  
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
132. **American Pipit** *Anthus rubescens*  25 Nov 2023  Al Duvall 
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
133. **Eastern Warbling Vireo** *Vireo gilvus*  5 Oct 2023  Alan V. Bacchiochi  
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
134. **Rose-breasted Grosbeak** *Pheucticus ludovicianus*  1 Oct 2023  Al Duvall  
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
135. **Swainson's Thrush** *Catharus ustulatus*  26 Sep 2023  mark alan iantosca
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
136. **Connecticut Warbler** *Oporornis agilis*  24 Sep 2023  Nate L-S  
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
137. **Dickcissel** *Spiza americana*  20 Sep 2023  Al Duvall  
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
138. **Bonaparte's Gull** *Chroicocephalus philadelphia*  29 Apr 2023  Alan V. Bacchiochi  
 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



139. **American Tree Sparrow** *Spizelloides arborea*
1 📅 28 Dec 2022 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
140. **Tufted Titmouse** *Baeolophus bicolor*
6 📅 19 Nov 2022 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
141. **Pine Siskin** *Spinus pinus*
1 📅 3 Nov 2022 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
142. **Purple Finch** *Haemorhous purpureus*
1 📅 23 Oct 2022 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
143. **White-breasted Nuthatch** *Sitta carolinensis*
1 📅 22 Oct 2022 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
144. **Bobolink** *Dolichonyx oryzivorus* 💬 📷
1 📅 14 Oct 2022 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
145. **Chestnut-sided Warbler** *Setophaga pensylvanica*
1 📅 10 Oct 2022 👤 Alan V. Bacchiochi
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
146. **Marsh Wren** *Cistothorus palustris* 💬 📷
1 📅 9 Oct 2022 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
147. **Great Cormorant** *Phalacrocorax carbo* 💬
1 📅 27 Mar 2021 👤 Ermilo Novelo
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
148. **Blue-winged Teal** *Spatula discors* 💬 📷
2 📅 26 Mar 2021 👤 Alan V. Bacchiochi
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
149. **Long-tailed Duck** *Clangula hyemalis*
1 📅 15 Apr 2020 👤 Christopher Chilton
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)
-
150. **American Woodcock** *Scolopax minor* 💬
1 📅 29 Feb 2020 👤 Caroline Craig
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



151. **Monk Parakeet** *Myiopsitta monachus*



1 📅 28 May 2019 👤 Alan V. Bacchiochi
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

152. **Common Goldeneye** *Bucephala clangula*



1 📅 18 Mar 2018 👤 Alan V. Bacchiochi
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

153. **Ash-throated Flycatcher** *Myiarchus cinerascens*



1 📅 19 Nov 2016 👤 Heydi Lopes
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

EXOTIC: ESCAPEE (2)

Budgerigar *Melopsittacus undulatus*



1 📅 20 Aug 2024 👤 Eric Stanton
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

Mandarin Duck *Aix galericulata*



1 📅 30 Jan 2019 👤 Alan V. Bacchiochi
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

HYBRIDS (1)

Mallard x American Black Duck (hybrid) *Anas platyrhynchos x rubripes*



1 📅 27 Jan 2025 👤 Greg Thornberg
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

ADDITIONAL TAXA (17)

Mallard/American Black Duck *Anas platyrhynchos/rubripes*

1 📅 19 May 2026 👤 Cailyn Hansen
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

blackbird sp. *Icteridae sp.*

1 📅 13 May 2026 👤 Joe Schiavone
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

gull sp. *Larinae sp.*

2 📅 21 Apr 2026 👤 Melissa Ainley
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

crow sp. *Corvus sp. (crow sp.)*

3 📅 9 Apr 2026 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



Larus sp. *Larus sp.*

10 📅 15 Mar 2026 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

Greater/Lesser Scaup *Aythya marila/affinis*

2 📅 28 Feb 2026 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

duck sp. *Anatidae (duck sp.)*

2 📅 4 Feb 2026 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

Alder/Willow Flycatcher (Traill's Flycatcher) *Empidonax alnorum/traillii*

1 📅 21 Aug 2024 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

Empidonax sp. *Empidonax sp.*

1 📅 21 Aug 2024 👤 Al Duvall
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

shorebird sp. *Charadriiformes sp. (shorebird sp.)*

1 📅 17 May 2024 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

falcon sp. *Falco sp.*

1 📅 9 Nov 2023 👤 Joe Weisbord
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

finch sp. *Fringillidae sp.*

2 📅 8 Oct 2023 👤 June Ap
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

wren sp. *Troglodytidae sp.*

1 📅 21 Sep 2023 👤 Nate L-S
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

new world sparrow sp. *Passerellidae sp.*

3 📅 6 May 2021 👤 Anne Rapaport
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

crow/raven sp. *Corvus sp.*

2 📅 29 Mar 2021 👤 Anne Rapaport
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)

Common/Red-breasted Merganser *Mergus merganser/serrator*

1 📅 5 Dec 2018 👤 Alan V. Bacchiochi
📍 Bushwick Inlet Park (btwn Quay St.-N 9th St.)



ORDER Charadriiformes

FAMILY Charadriidae

GENUS Charadrius



Killdeer

Charadrius vociferus ⓘ

NT Near Threatened | Names (56) | Subspecies (3)

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Introduction

The Killdeer is by far the most wide-spread and familiar of North American plovers because of the habitats it frequents, its tolerance of humans, its easily observed and often anthropomorphized parental care, and its *killdeer* vocalizations. Earlier common names, such as Chattering Plover ([Catesby 1731](#)) and Noisy Plover ([Latham 1785](#)), described the very vocal nature of this species. Once the target of market hunters and in serious decline, the Killdeer is probably more common today than at any time in its history as a result of habitat changes wrought by humans. At the same time, the species is vulnerable to twentieth-century problems such as pesticides, oil pollution, lawnmowers, and automobiles. Breeding Bird Surveys suggest that it is declining in some western states.

Although technically shorebirds, Killdeer are often found away from shores as well as near them, frequenting mudflats, gravel bars, short-grass meadows, and their twentieth-century counterparts, such as construction sites, road shoulders, gravel roads and driveways, graveled rooftops, lawns, pastures, and golf courses. They are most often found near water of some sort, even if it is a lawn sprinkler. Their long legs and running-stopping-bobbing gait are co-nspicuous, but not nearly so attention-getting as the broken-wing act and piteous cries they indulge in to draw potential predators away from nests and chicks.

Nesting begins in early spring—March in the Deep South, April in the middle states, May in the northern tier of states and southern Canada, and June in the far north. In the Caribbean, Killdeer will nest year-round. A disjunct breeding population of Killdeer in coastal Peru and northwestern Chile breeds at least in January and June.

Long, pointed wings allow rapid flight and quick maneuvers. Northern populations are migratory, southern ones resident. The Killdeer is active both day and night and can often be heard calling overhead in the darkness, especially in early spring and late summer. Mall parking lots and lighted ball fields seem to be attractive for nocturnal activities, which

assemblage also including Common Ringed, Semipalmated, Wilson's (*C. wilsonia*), Piping (*C. melodus*), Long-billed (*C. placidus*), and Little Ringed (*C. dubius*) plovers ([Joseph et al. 1999](#); also phylogenetic analysis of mitochondrial DNA [M. Peck unpubl.]). Close but peripheral relationship of Killdeer to ringed plovers was proposed earlier by Bock ([Bock 1958](#)), who based his conclusions chiefly on external morphology. Killdeer also formerly placed in a separate genus, *Oxyechus* ([American Ornithologists' Union 1931](#)).

Fossils

Known from the Blancan (late Pliocene-early Pleistocene; no radiometric date) of San Diego Co., CA ([Becker 1987a](#)); from late-Pleistocene asphalt pits at La Brea and McKittrick, CA ([Miller and DeMay 1942](#), [Wetmore 1956a](#)).

Distribution

Breeding Range

Breeds from e.-central and se. Alaska, s. Yukon Territory, w.-central and s. Mackenzie, n. Saskatchewan, n. Manitoba, n. Ontario, s.-central Quebec (to about 52°N; [Gauvreau and Alvo 1996a](#)), and n. Newfoundland south throughout Canada and U.S. (including Masset in Queen Charlotte Is., Vancouver I., Channel Is. [where rare], w. Anticosti I., and Magdalen Is.), and Mexico to s. Baja California, and to Jalisco, Puebla, and central Tamaulipas ([Godfrey 1986](#), [Campbell et al. 1990a](#), [Small 1994](#), [Howell and Webb 1995](#), [Gauvreau and Alvo 1996a](#), [American Ornithologists' Union 1998a](#)). In West Indies, breeds throughout Bahamas, Greater Antilles, and Virgin Is. ([Raffaele et al. 1998](#), [White 1998](#)). Also breeds disjunctly farther south in Costa Rica around Cartago and probably elsewhere in central highlands ([Stiles and Skutch 1989](#)); on Aruba ([Voous 1983b](#)), where occurrence is associated with development of sewage lagoons (R. De Kort pers. comm.); and in coastal Peru and extreme nw. Chile ([American Ornithologists' Union 1983](#)). Has

recently expanded northward from Peru to become resident in sw. Ecuador (to 800 m at Loja) and is possibly expanding in Chile (R. Ridgely pers. comm.). Within described range, breeds primarily in open habitats, more commonly in lowlands, but occasionally at higher altitudes (e.g., to 2,134 m in Nevada [[Linsdale 1951](#)]; to 2,438 m in New Mexico [[Bailey 1928b](#)]).

Winter Range

Winters from se. Alaska (rare), coastal (including Vancouver I.) and extreme s. interior of British Columbia, Washington, Oregon, s. Idaho, Utah, Colorado, s. Kansas, s. Missouri, s. Illinois, s. Indiana, s. Ohio, se. Pennsylvania, coastal se. New York, coastal Connecticut, and coastal Massachusetts south through remainder of breeding range. Absent from Appalachian Mtns. region from West Virginia south to ne. Tennessee, and from other areas of high elevation. Rare and local north to Nova Scotia and other southern portions of e. and central Canada, with larger numbers wintering in these areas during milder winters. Migratory individuals winter south throughout Central America, Colombia, and Venezuela, and along west coast of South America to Peru and Chile ([American Ornithologists' Union 1998a](#)). One record from Galápagos Is. ([Harris 1974a](#)), but rare from Panama south (R. Ridgely pers. comm.). Also winters on Bermuda ([Amos 1991](#)); throughout Bahamas ([Brudenell-Bruce 1975](#), [Miller 1978b](#), [Connor and Lofkin 1985](#), [Buden 1987a](#)), Greater and Lesser Antilles ([Raffaele et al. 1998](#)), and Cayman Is. ([Bradley 1985b](#)); and in Virgin Is. and n. Lesser Antilles south to St.-Barthélemy and San Andrés. Rare to very rare elsewhere in Lesser Antilles ([Raffaele et al. 1998](#)).

Extralimital Records

Casual on Clipperton I. (southwest of Mexico), in Pribilof Is. (Bering Sea; [American Ornithologists' Union 1998a](#)), and from breeding range north to n. and w. Alaska ([Johnson and Herter 1989](#), [Kessel 1989](#)), n. Yukon Territory, n. Mackenzie, s. Keewatin, and central Labrador ([American Ornithologists' Union 1998a](#)). On 20 Jul 1993, a single Killdeer was observed on Bylot I., Northwest Territories, the first record for the Canadian Arctic Archipelago ([Lepage et al. 1998b](#)).

Accidental vagrant to Hawaiian Is. (Kaua'i, O'ahu, Maui; [American Ornithologists' Union 1998a](#) and on Chukchi Peninsula of Russia ([Andreev et al. 1992](#)). Records from Greenland,

Iceland ([Skarphedinsson 1991](#)), Norway, Faeroe Is., British Isles, Switzerland, Hungary, Romania, Spain, and Azores ([Alström and Colston 1991](#)). Most British and European records are from winter and linked with strong storm winds; Killdeer differs from other Nearctic waders in its late autumn–winter arrival in Europe. The presence of 5 Killdeer on coast of France ([Paris 1972](#)) suggests displacement of a migratory flock.

Historical Changes to the Distribution

Within twentieth century, Killdeer breeding range expanded north and south in North America and from inland areas to coastal areas. Nesting in s. Florida and expansion of breeding range from n. and central Florida to throughout Florida Peninsula is well documented ([Stevenson and Anderson 1994b](#)). Rare in Quebec in 1906, but a common breeder by 1916 ([Brown 1916](#)); now relatively abundant breeder in s. Quebec ([Cyr and Larivee 1995a](#)); more recent invader as breeding bird in Nova Scotia ([Finch 1969](#)). Rare on both coasts of Canada at beginning of twentieth century ([Chamberlain 1887](#), [Macoun 1900](#)); by 1925, no longer considered rare in coastal British Columbia ([Brooks and Swarth 1925](#)). Recently expanded as breeding bird to Newfoundland and Magdalen Is., Quebec ([Strauch 1971](#)); also Aruba ([Voous 1983b](#)). Earlier, nonbreeding summer visitor in coastal S. Carolina ([Audubon and Chevalier 1840](#), [Wayne 1910](#)), and absent as breeder in coastal Alabama ([Stevenson 1939](#)); Killdeer now nest in both areas (JAJ). Apparent increase in breeding populations to the north in Illinois between 1909 and 1958 ([Graber and Graber 1963](#)) and Breeding Bird Survey (BBS) data ([Robbins et al. 1986a](#)) suggest population increases in e. and central U.S. Since 1987–1992, however, significant ($p < 0.001$) decline in Killdeer numbers on 43 N. Dakota BBS routes ([Reynolds et al. 1994a](#)).

Habitat

Habitat in Breeding Range

Frequents open areas, especially sandbars, mudflats, heavily grazed pastures, and such

human-modified habitats as cultivated fields, athletic fields, airports, golf courses, graveled or broken-asphalt parking lots, and graveled rooftops. For 29 prairie plots in sw. Missouri, vegetation on those used by Killdeer was generally <1 cm tall (67% covered with grass <1 cm tall, 5% with forbs <1 cm tall); principal components and cluster analyses of species by habitats used placed Killdeer closest to Northern Flicker (*Colaptes auratus*), Horned Lark (*Eremophila alpestris*), and Mourning Dove (*Zenaida macroura*; [Skinner et al. 1984](#)). In Arizona, nests usually associated with permanent water ([Brandt 1951](#)). See also [Breeding: nest site](#), below.

Habitat in Nonbreeding Range

Habitat in Migration

Mudflats left by receding floodwaters and human-made wetlands such as sewage lagoons and reservoirs are favored stopover and feeding areas, as are gravel bars in rivers, fallow agricultural fields, and broad expanses of open, closely mowed grassy areas such as sod farms and golf courses, particularly when wet. Such sites often attract hundreds of Killdeer. In general, uses open habitats similar to those used in breeding season. Uses both freshwater and saltwater habitats. Uses a greater variety of terrestrial habitats than most other shorebirds do ([Skagen and Knopf 1994a](#) [Kansas]; [Colwell and Oring 1988b](#) [Saskatchewan]).

Habitat in Overwintering Range

Uses open habitats similar to those used in breeding season; habitats similar throughout species' range.

Movements and Migration

Migration Overview

Medium-distance partial migrant. Movements complex and poorly understood. Banding

records suggest general southward fall migration in North American birds, with no strong directional orientation ([Lincoln 1936](#)). Birds from northern areas in e. North America winter in Gulf and s. Atlantic states (see [Figure 1](#)). Migrants passing through w. North America and Central America are more commonly seen in upland meadows ([Bailey 1928b](#), [Land 1970](#)). Some birds winter in coastal and wetland areas of California. In ne. California and central Nevada, Killdeer remain as long as there is water; when a heavy snow falls, they leave; most migrate by Aug (L. W. Oring pers. comm.). Reported increases of populations in Greater Antilles in winter ([Rodriguez and Garcia 1987](#)) could reflect concentration of birds dispersed within the region at other seasons or influx of North American migrants. We suspect that both are true, but data are not available to confirm either hypothesis.

No tendency for leapfrog migration among Killdeer populations ([Boland 1990](#)). In s. U.S. (Mississippi; [Schardien 1981](#)), some individuals are resident and maintain territories year-round; South American, Bahamian, and West Indian breeders probably also resident. In Mississippi, migrants and residents do not seem to mix (JAJ, BJSJ). Dividing line between typically migrant and typically resident populations is a broad transition zone at about the latitude of Tennessee and fluctuates from year to year, probably coincident with snow cover and frozen ground, which interfere with foraging.

Timing and Routes of Migration

Spring

Spring migration is early and prolonged across North America. Most migrants have departed Panama by late Mar, but occasionally they linger until mid-Apr ([Ridgely and Gwynne 1989](#)). Migration probably begins as early as mid-Feb in Florida ([Stevenson and Anderson 1994b](#)) and Bermuda ([Amos 1991](#)). Migration begins in Pennsylvania late Feb or early Mar, or by second or third week of Mar in colder years, and usually peaks in last 3 wk of Mar ([McWilliams and Brauning 2000](#)); migrants usually arrive last week of Mar in Quebec ([Gauvreau and Alvo 1996a](#)). Migration begins mid- to late Feb in s. Missouri, peaking in early Mar ([Robbins and Easterla 1992](#)), and in Wisconsin many arrive by early Mar, but there is a rapid buildup of populations between 15 and 25 Mar, and nonbreeding

birds have generally departed by 10 Apr ([Robbins 1991](#)). Migration is believed to occur primarily in Mar in Sonora, Mexico ([Russell and Monson 1998](#)), and begins mid-Feb in s. British Columbia, peaking mid-Mar through Apr, or through mid-May in the north ([Campbell et al. 1990a](#)). Arrives early to mid-Mar in s. Alberta and by mid-Apr in the north ([Semenchuk 1992](#)).

Fall

Postbreeding flocks begin to increase Jun–Aug in British Columbia; migration occurs late Jul through Nov along coast of British Columbia (ends in Oct in the interior; Campbell et al. ([Campbell et al. 1990a](#)). Migration is believed to occur primarily in Aug and Sep in Sonora, Mexico ([Russell and Monson 1998](#)). In Illinois, may begin as early as late Jun ([Bohlen 1989](#)). Premigratory flocks in s. Michigan by late Jul; some depart the area by mid-Aug ([Bunni 1959](#)). Flocks of 250–300 reported in Wisconsin during late Aug–early Sep, and most leave Wisconsin by 20 Nov ([Robbins 1991](#)). In Quebec, migration peaks in late Aug, and most have departed by late Sep, with small numbers remaining through late Nov ([Gauvreau and Alvo 1996a](#)). In Pennsylvania, migration peaks in Sep and Oct, with stragglers through mid- to late Nov ([McWilliams and Brauning 2000](#)). Fall migrants begin arriving in Florida during Jul and Aug ([Stevenson and Anderson 1994b](#)). Fall hurricanes may stall migration, concentrate flocks, move flocks inland, and disperse birds beyond their normal range ([Forbush 1912](#)). Some individuals remain at more northern sites (e.g., n. Illinois) until forced south as late as Jan by extreme weather ([Bohlen 1989](#)). Tower strikes in Florida have occurred in Dec, Jan, and Feb, suggesting that some movement occurs continuously in this area throughout winter ([Stevenson and Anderson 1994b](#)).

Northern migrants in Costa Rica by mid-Oct, in Peru (lowlands only) by late Oct ([Cooke 1912](#)). Most common in Panama from late Oct to late Mar; occasionally remains to mid-Apr ([Ridgely and Gwynne 1989](#)).

Routes

Winter recoveries of birds banded during breeding season include records for movements from Indiana and Wisconsin to both Louisiana and S. Carolina, New York to Georgia, Alberta to Kansas, and Pennsylvania to Florida ([Bell 1965b](#), [Robbins 1991](#)). A Killdeer chick banded in Michigan was captured the following Jan in Florida ([Berger](#)

[1953](#)). Return of banded birds to same breeding area in multiple years suggests strong breeding-area fidelity. Migration to South American wintering areas seems largely through Greater Antilles, Mexico, and Central America. Transient through Guatemala, where more common in highlands to 3,100 m ([Land 1970](#)). Uncommon migrant in Trinidad, Tobago, and Barbados ([French 1973](#)).

Flock Sizes And Winter Populations

In Florida, winter populations can reach 10–50 times as high as lowest numbers during breeding season ([Stevenson and Anderson 1994b](#)). In Mississippi, wintering birds tend to remain in small flocks and separate from residents that maintain territories year-round (JAJ, BJSJ). In Oregon, summer flocks in wet meadows can number several thousand ([Gabrielson and Jewett 1940](#)), and in early Sep “perhaps 2000” Killdeer were seen at Turnbull National Wildlife Refuge, Spokane Co., WA, although few remained after a freeze ([Rogers 1970a](#)). Along northern coast of Cuba, Killdeer were the most abundant species censused during Jan and Feb, but numbers dropped precipitously by early Mar, presumably signifying departure of migrants ([Rodriguez and Garcia 1987](#)).

Migratory Behavior

Migrates during day and at night. Migrants generally travel in flocks of 6–30 birds, which, during rests and foraging, aggressively maintain individual distances of 4–6 m. Flocks may be displaced long distances by bad weather ([Gould 1889](#)), probably accounting for most European records. In Feb 1951, after severe cold and snow in Alabama, Killdeer appeared in large numbers in n. Florida ([Weston 1965a](#)). In Mississippi, migrant flocks of 15–20 Killdeer loaf in mall parking lots at night in Sep, chasing occasional insects on the asphalt under lights, flying in circles around the lights while calling loudly, and interacting on the ground to defend individual distances of about 5 m (JAJ, BJSJ). Migrant Killdeer often join, but remain peripheral to, groups of other migrant shorebirds at feeding and loafing sites.

Control and Physiology of Migration

carolina), and Song Sparrows (*Melospiza melodia*; [Saunders 1926](#)). When Lesser Yellowlegs (*Tringa flavipes*) chased young Killdeer, adult Killdeer drove yellowlegs away ([Furniss 1933](#)). A Killdeer egg that was dumped in a Snowy Plover (*Charadrius nivosus*) nest was successfully hatched by the Snowy Plovers ([Agee 1997](#)); another Killdeer egg, laid in a Piping Plover nest in which incubation had already begun, caused nest abandonment ([Putnam 1948](#)). An Eastern Wood-Pewee (*Contopus virens*) attempted to feed insects to 2-d-old captive Killdeer chicks that were constantly giving distress calls; the chicks were not observed to take the food; 10-d-old chicks in same pen responded to the pewee by crouching and freezing ([Powell 1990](#)). Territorial American Kestrels (*Falco sparverius*; [Cade 1955a](#)), European Starlings (*Sturnus vulgaris*; [Weitzel 1988](#)), Eastern Kingbirds (*Tyrannus tyrannus*; [Saunders 1926](#)), and Northern Mockingbirds (*Mimus polyglottos*; JAJ, BJSJ) have been observed driving away Killdeer. In response to close approach of Northern Mockingbird, 1 Killdeer crouched with its back to mockingbird and fanned its tail, exposing its rusty back. A European Starling was observed stealing earthworm from Killdeer ([Jackson in press](#)).

May be vector for dispersal of gastropod mollusks (Malone [Malone 1965a](#), [Malone 1965b](#)) and spores of water fern (*Marsilea mucronata*; [Malone and Proctor 1965](#)).

Predation

Kinds Of Predators

Reptilian, mammalian, and avian predators that take adults, their eggs, and/or chicks include the following:

Eggs. Gray rat snake (*Elaphe obsoleta*; JAJ), opossum (*Didelphis virginiana*; JAJ, BJSJ); raccoon (*Procyon lotor*; [Brunton 1990](#)), mustelids ([Lambert and Nol 1978](#), [Nol 1980](#)), coyote (*Canis latrans*; [Powell and Cuthbert 1993](#), L. W. Oring pers. comm.), domestic dogs (*Canis familiaris*; [Powell and Cuthbert 1993](#)), gulls (*Larus* spp.; [Lambert and Nol 1978](#), [Nol 1980](#)), Great Horned Owl (*Bubo virginianus*; [Knight and Jackman 1984](#)), Black-billed Magpie (*Pica pica*; [Mundahl 1979](#)), American Crow (*Corvus brachyrhynchos*; [Miller 1949](#), [Brunton 1990](#)), and Common Raven (*Corvus corax*; L. W. Oring pers. comm.).

base of downspout, whereupon chicks would go to top of downspout and leap into it, sliding to ground level ([Schardien 1981](#)).

Growth

Supraorbital rims of skulls of immature Killdeer are less ossified than those of adult Killdeer, but similar in extent to those of adult Wilson's and Snowy plovers ([Bock 1958](#)). Bock links Killdeer skull morphology to lesser extent of nasal glands of primarily freshwater Killdeer compared to Ringed Plover, which lives in more saline environment and has less ossified supraorbital rims.

Ability To Get Around, Feed, And Care For Self

Ability to fly is attained by 20 ([Demaree 1975](#)) to 31 ([Lenington 1980](#)) d of age. Schardien ([Schardien 1981](#)) found that some chicks in Mississippi attained ability to fly by age 30 d, whereas others did not.

Behavior After Independence

Chicks remain in close association with parents and siblings until they can fly. Schardien ([Schardien 1981](#)) observed marked chicks with their parents regularly until age 39 d, and 1 instance of a chick foraging with its parents at age 81 d.

Demography and Populations

Measures of Breeding Activity

Age At First Breeding; Intervals Between Breeding

Both sexes will breed at 1 yr of age (JAJ, BJSJ). Shortest interval between loss of eggs or chicks and completion of new clutch was 8 d in Mississippi. One pair whose first 2 eggs were destroyed shifted to another scrape and laid 4 more eggs over next 4 d ([Schardien 1981](#)). In Michigan ([Bunni 1959](#)) and Minnesota ([Lenington 1980](#)), females began laying second clutch while male tended first brood. This behavior has not been observed in Mississippi (BJSJ and JAJ).

Clutch

Typically 4 eggs; reports of fewer may reflect lost eggs. Reports of 5 are rare and usually poorly documented ([Townsend 1929](#), [Miller 1933d](#), [Stone 1937](#), [Nickell 1943](#)). Kantrud and Higgins ([Kantrud and Higgins 1992](#)) found one 5-egg clutch among 157 nests from n.-central U.S. and s.-central Canada. Kohler ([Kohler 1932](#)) reported clutch of 6 eggs, all of which successfully hatched, in New Jersey. In Mississippi, 1 pair was found tending 5 chicks ([Jackson and Jackson 1989a](#)), and 1 pair had 8 eggs (JAJ). The clutch of 8 was laid at rate of 1 egg/d; incubation began after eighth egg; both adults tending nest were color-banded. Although other Killdeer were in the vicinity, none was seen at the nest. During incubation, an adult was never able to cover >6 (usually fewer) eggs. Thus, hatching of all eggs in such supernumerary clutches is unlikely, except during exceptionally warm weather when birds must cool eggs rather than warm them. At the nest of 8 eggs in Mississippi, only 1 egg hatched, and then only after being removed to an incubator after it had been pipped.

Annual And Lifetime Reproductive Success

Data on reproductive success (or lack thereof) have been collected or presented in several different ways and are often not directly comparable. Kantrud and Higgins ([Kantrud and Higgins 1992](#)) found that young were produced at 39% of nests ($n = 79$) in native grassland and 57% of nests ($n = 27$) in cropland in n.-central U.S. and s.-central Canada. In Ontario, Nol ([Nol 1980](#)), using Mayfield ([Mayfield 1975a](#)) method, found success rates of 28.9% for 17 nests on Long Point, 64% for 12 nests on adjacent mainland. Of 101 nests observed in Mississippi over 4 yr, 38 (37.6%) hatched at least 1 egg; of 374 eggs laid, 132 (35.5%) hatched, and 16 chicks (12.1%) are known to have survived to fledging ([Schardien 1981](#)); thus, at minimum, average of 0.16 fledged young produced per nesting attempt. In Minnesota, Lenington ([Lenington 1980](#)) reported overall annual success of 1.6 independent young, and Mace ([Mace 1971](#)) an average of 0.5 young per pair. No information available on lifetime reproductive success.

Killdeer are tolerant of disturbance and typically remain attentive to eggs and young despite disturbance and adverse weather conditions. The vast majority of reproductive failures are a result of avian, reptilian, and mammalian predation. Nests in certain

locations such as pastures, lawns, and roadsides are often lost to associated human activities such as mowing. Killdeer nesting on rooftops often lose young to starvation and dehydration when barriers prevent the young from leaving the rooftops, and to fatal falls when the young birds leap from the rooftops in response to encouragement from the adults (BJSJ and JAJ). Nol ([Nol 1980](#)) attributed all nest failures to mammalian and avian predation.

Number Of Broods Normally Reared Per Season

One or fewer ([Schardien 1981](#)).

Proportion Of Total Females That Rear At Least One Brood To Nest-Leaving Or Independence

No information.

Life Span and Survivorship

An individual banded as chick was trapped and released 10 yr 11 mo later at same general locality (Cheyenne Bottoms, KS; [Clapp et al. 1982b](#)). No other information.

Pathogens and Parasites

Diseases And Internal Parasites

At site of epidemic of chlamydiosis in domestic turkeys (*Meleagris gallopavo*) in Texas, 4 of 9 Killdeer were sero-positive for the disease ([Page 1976a](#)). Killdeer were among several shorebird species killed during a New Jersey botulism outbreak in Sep 1965 ([Manners 1965](#)). At least 12 species of internal parasites, including members of phyla Acanthocephala (spiny-headed worms), Platyhelminthes (including tapeworms and flukes), and Nematoda (roundworms), are known from Killdeer ([Eckman 1968](#)). Laboratory attempts failed to infect Killdeer with the trematodes *Cyclocoelum obscurum* ([Taft 1973](#)), *C. vanelli* ([Taft 1974](#)), and *C. brasilianum* ([Taft 1975](#)).

External Parasites

The mite *Sokoloviana kucheruki* (Acarina) was described from a Killdeer in Cuba ([Cerny 1976](#)).

Causes of Mortality

Exposure

Apparently uninjured but dead Killdeer were found during or immediately after severe cold in Florida ([Stevenson and Anderson 1994b](#)) and Louisiana ([McIlhenny 1940](#)). In Mississippi, Schardien and Jackson ([Schardien and Jackson 1984](#)) photographed Killdeer with ice-encrusted legs.

Predation

Ants (*Iridomyrmex pruinosus*) invaded pipped Killdeer eggs (at only 1 of 101 nests observed in Mississippi), resulting in nest abandonment ([Jackson and Jackson 1985a](#)). See also Behavior: predation, above.

Competition With Other Species

No information. See Behavior: social and interspecific behavior, above.

Pesticides

See Conservation and management: effects of human activity, below.

Hunting

See Conservation and management: effects of human activity, below.

Complications Associated With Rooftop Nesting

Eggs in some rooftop nests fail to hatch as result of extreme heat and possibly fumes from hot asphalt. Chicks of roof-nesting Killdeer often are trapped by high parapets and screened drainage openings, often dying because of combined effects of starvation, lack of water, and excess heat ([Giegling 1979](#)). Where air-conditioning units provide puddles of water and security lights attract nocturnal insects, some survival of trapped chicks is possible. Chicks have been observed to survive leaps from a 7-story building (BJSJ and JAJ), but many chicks die when hitting ground or concrete after leaps of lesser heights.

Population Spatial Metrics

Initial Dispersal From Natal Site

A few chicks in Mississippi were observed to remain in their general natal area to nest in subsequent years ([Schardien 1981](#)). Two of 48 birds banded as chicks returned to a Minnesota study site, where they were defeated in territorial encounters and not seen again ([Lenington and Mace 1975](#)).

Fidelity To Breeding Site And Winter Home Range

Distance from first nests to second nests within same year for 11 pairs in Minnesota averaged about 114 m (range 15–290); second nest of a twelfth pair was 1,097 m away from first ([Mace 1971](#)). In Mississippi, mean distance between successive nests of same pair was $88.7 \text{ m} \pm 71.6 \text{ SD}$ (range 0–276, $n = 22$; [Schardien 1981](#)). Schardien ([Schardien 1981](#)) found considerable site tenacity for marked birds from year to year in Mississippi: 5 pairs nested within 5 m of nest site they had used the previous year. Nesting Killdeer in Mississippi frequently remained on their breeding territory year-round ([Schardien 1981](#)).

Lenington and Mace ([Lenington and Mace 1975](#)) found that of 31 Killdeer banded in Minnesota, 1 male occupied same territory for 4 yr, 3 males and 1 female occupied same territory for 3 yr, and 6 males and 2 females occupied same territory for 2 yr, suggesting that males have greater tendency than females to return to breeding sites.

No information on site tenacity of wintering migrants.

Dispersal From Breeding Site Or Colony

No information.

Home Range

During nesting, average home range of 7 pairs in Minnesota was 0.23 ha (range 0.04–1.1; [Mace 1971](#)). Larger home ranges were characteristic of birds with nests farther from feeding areas. Breeding territories (defended areas) of 7 pairs of marked Killdeer in Mississippi averaged $0.68 \text{ ha} \pm 0.19 \text{ SD}$ (range 0.5–1.0; [Schardien 1981](#)). Phillips ([Phillips 1972](#)) and Schardien ([Schardien 1981](#)) noted, however, that a nonincubating adult will

often go considerable distance outside of its territory to feed; thus, home ranges are considerably larger than territories. Schardien also found that territory boundaries often shift with nesting attempt, that territory defense is often sporadic, and that after a brood hatches and is led away, another pair may occupy same nesting territory.

In ne. California, Plissner et al. ([Plissner et al. 2000b](#)) found that Killdeer home ranges averaged about 6 ha ($n = 10$), with smaller home ranges used during nesting, and greater used after nesting. Birds nesting farther from water tended to travel greater distances from nest to find food; nesting females tended to travel farther than nesting males.

During fall and winter, resident Mississippi Killdeer often maintain presence on breeding territory, but they can also be found with small groups of Killdeer at choice feeding areas. One such bird was once seen feeding with its mate 2.7 km from its breeding territory ([Schardien 1981](#)).

Spacing

Territoriality

Territorial defense encounters are most common during courtship and nest-building early in breeding season; some pairs remain territorial year-round in Mississippi ([Schardien 1981](#)). Mean distance to nearest neighboring nest at time of nest initiation was 244 m (range 13.7–579) in Minnesota ([Mace 1971](#)), $119.4 \text{ m} \pm 48.5 \text{ SD}$ (range 30–221, $n = 22$) in Mississippi ([Schardien 1981](#)).

Myers et al. ([Myers et al. 1979a](#)) observed territorial behavior in wintering Killdeer in tidal sloughs and marshes and inland wetlands in central California.

Individual Distance

Wintering migrant Killdeer in Mississippi tend to remain in flocks, but maintain individual distances of 4–6 m while foraging on wet lawns (JAJ, BJSJ).

Population Status

Numbers

Nol and Lambert ([Nol and Lambert 1984](#)) found 12.9–30 pairs/100 ha in s. Ontario; Ontario Breeding Bird Atlas results suggest densities of 11–100 pairs/100 ha ([Cadman et al. 1987](#)). In 7.1 ha of dry meadow on an island in Detroit River, MI, Miller and Miller ([Miller and Miller 1948](#)) found 5 pairs of Killdeer. Beecher ([Beecher 1942](#)) found 7 nests in primarily cultivated habitat in Illinois, averaging 7.03 ha of habitat/nest. Sod farms, golf courses, sewage disposal lagoons, and tidal mudflats often attract hundreds of Killdeer during late summer before migration, as well as during migration and on wintering areas. Annual counts at such sites in late summer, when habitat provided remains stable from year to year, could provide population indices of this otherwise dispersed species.

Trends

Morrison ([Morrison 1993](#)) estimated that 100,000 Killdeer occur in Canada and that populations are stable in Pacific region, possibly stable in central region, and possibly declining in eastern region. Bourget ([Bourget 1993](#)) censused 636 Killdeer during fall migration along St. Lawrence River system in Quebec.

Population Regulation

Predation and other destruction of eggs and young are the major known source of mortality for the species ([Nol 1980](#), BJSJ and JAJ). Population density apparently limited by territoriality. Foraging habitat (e.g., golf courses, agricultural fields) and nesting habitat (e.g., gravel roads, driveways) that appear to be optimum may function as ecological sinks because of negative impacts of pesticides or destruction of eggs and chicks.

Conservation and Management

Conservation Status NT Near Threatened

Effects of Human Activity

Shooting And Trapping

Audubon and Chevalier ([Audubon and Chevalier 1840](#)) noted that Killdeer could be found in the market at almost any time of year, but that their flesh was generally “indifferent” except for fat young birds in autumn. In the South, Killdeer were sometimes caught with hook and line baited with worm ([Wilson 1840](#)). Dawson ([Dawson 1923](#)) also suggested that Killdeer are not good eating, but that sportsmen hated them and shot them on sight because their loud calling often warned game species of hunter's approach (cf. [Latham 1785](#)). Other authors, however, suggest that Killdeer were widely eaten ([Hatch 1892](#)). Laws were passed by some states to protect Killdeer (Forbush [Forbush 1907a](#), [Forbush 1912](#)). Widespread protection finally came about for the species because of low numbers, the fact that it was not particularly good eating, and recognition of its beneficial food habits. Although Killdeer have not been legal game for nearly a century, they are still frequently killed by hunters who mistake them for Mourning Doves.

Pesticides And Other Contaminants/Toxics

Because of their association with humans (see below), Killdeer may be particularly susceptible to chemical pollutants, such as cyanide, associated with mining activities ([Henny et al. 1994b](#)); pesticides; and oil. Killdeer frequently forage on lawns and golf greens, and in association with other birds they can effect 80% control of sod webworms ([Kamm 1973](#)). Unfortunately, the chemicals used to control sod webworms, and other chemicals used to control insect or rodent pests in agricultural fields, can be lethal to the birds. Fisk ([Fisk 1976](#)) counted 175 dead Killdeer after application of Azodrin to a field where they were foraging. Carbaryl used to control grasshoppers ([Fair 1993b](#), [Fair et al. 1995](#)) may attract Killdeer as result of temporary abundance of dying insects, and then may require shift in prey and foraging over wider area as result of decreased prey abundance ([Fair 1993b](#)). Strychnine used to control rodents has been lethal to Killdeer ([Warnock and Schwarzbach 1995](#)). Killdeer collected in Nebraska ([Fair 1993b](#)) had detectable residues of several pesticides in fatty tissues, including mirex, a compound once aerially applied throughout the se. U.S., but not used in Nebraska. Physiological threats of organochlorine pesticides include their potential lethal mobilization from fatty tissues during periods of stress and toxic synergism as birds are exposed to different chemicals ([Fair 1993b](#)).

At a selenium-contaminated reservoir in California, 4% of eggs in successful nests ($n = 18$ nests containing 53 eggs) failed because of embryotoxicosis ([Ohlendorf et al. 1989a](#)).

Collisions With Stationary/Moving Structures Or Objects

Killdeer seem more prone than other shorebirds to strike television towers and tall buildings during nocturnal movements. Because the gravel aprons frequently present along roadsides are attractive to this species as potential nest sites, and the raised open beds of roads are attractive as display sites, Killdeer are particularly vulnerable to being struck by vehicles.

Modification Of Habitat

Historically in e. North America, Killdeer were almost certainly limited to coastal areas and beaches and sandbars of major rivers. As forests were cleared, numbers of this species probably increased, and its range became less linear and fragmented. Original natural habitats in the East were degraded or eliminated by human disturbances such as stream-channeling and dam construction, but simultaneously the species was expanding into new open habitats created by humans. For example, growth of a Connecticut Killdeer population was associated with golf course development ([Lacey 1923](#)). Net population change in e. North America as a result of habitat changes is likely very positive. However, hunting resulted in serious decline of Killdeer populations along Atlantic Coast in late 1890s and early 1900s ([Forbush 1912](#), [Bailey 1913](#); see above).

Direct Human/Research Impacts

Today Killdeer are among the most ubiquitous and successful of shorebirds, especially in human-modified environments. They are attracted to many human environments and commonly nest in close association with humans. Their preference for white gravel has been used experimentally to attract nesting Killdeer to a meadow where they had not nested previously ([Jackson 1924](#)). As a result of their close association with humans, Killdeer are particularly vulnerable to adverse impacts of human activities. Although they can habituate to human activity and noise near nests ([Lincoln 1942](#)), Killdeer often nest in harm's way: centers of gravel roads, areas that flood, etc. In such situations, it is often possible to move eggs a few centimeters at a time to a less threatened site. Dawson ([Dawson 1923](#)) built an elevated platform to raise a nest above floodwaters; the Kill-deer

accepted it, but only after a runway was built allowing the birds to walk up to the nest.

Management

Killdeer have been used as models for studies of endangered Piping Plovers ([Powell and Cuthbert 1993](#)). They have also been successfully reared from eggs or chicks obtained from the wild ([Powell and Cuthbert 1993](#)) and have been maintained in numbers in captivity for up to 2 yr ([Malone and Proctor 1966](#)). Killdeer eggs have been hatched and chicks reared by Spotted Sandpipers in cross-fostering experiments ([Powell and Cuthbert 1993](#)). Both cross-fostered and hand-reared Killdeer chicks have interacted normally with wild Killdeer, but problems of synchronization of nesting efforts, availability of host nests, natural predation, weather-caused mortality, and potential imprinting of chicks on foster parents make captive rearing a more desirable technique.

Lambert and Nol ([Lambert and Nol 1978](#)) found that wire enclosures placed over Killdeer nests were accepted by Killdeer and were effective in reducing predation by gulls, but ineffective against mammalian predators. Thus, proven techniques are available should the species require conservation assistance.

Priorities for Future Research

No detailed studies of Killdeer have been made in the Caribbean or in South America. Certainly good quantitative natural history studies in these areas are needed. Nocturnal behavior of the species has received scant attention. In particular, more information is needed on the extent of feeding at night, possible variation in nocturnal foraging with moon phase, the roles of the sexes in incubation and brooding at night, and the nature of social interactions at night. Long-term studies of marked populations are needed, as are more data on dispersal. Molts are only superficially understood and are in clear need of quantification. To what extent do molts overlap nesting and/or migration? Measurement data are sparse and poorly defined and as a result not necessarily comparable.

Geographic, seasonal, and diurnal variation in mass are unknown and would be worthy of study relative to migratory and reproductive status. Are older birds more likely than hatch-year young to remain in more northern areas? Is migration regular, with birds returning to the same wintering areas year after year, or is it influenced on an annual basis by weather and/or food availability? Are southern populations at all migratory? Where do wintering birds in the West Indies breed? Is ingestion of seeds deliberate or accidental?

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[+ Enlarge](#)



Distribution of the Killdeer



[All Illustrations \(6\)](#)

eBird and Macaulay Library

 **8,503,729**
Observations

 **281,455**
Photos

 **7,291**
Recordings

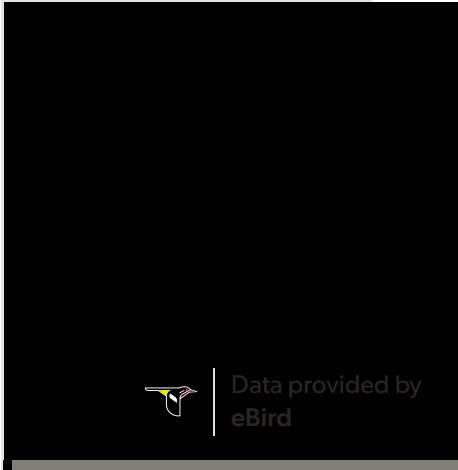
 **464**
Videos

eBird range map + [Enlarge](#)

for Killdeer

Generated from eBird observations (Year-Round, 1900-present)

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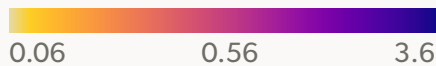
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Killdeer *Charadrius vociferus*

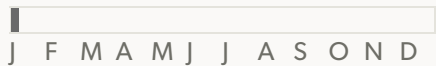
Abundance

Estimates of relative abundance for every week of the year animated to show movement patterns. Relative abundance is the estimated average count of individuals detected by an eBirder during a 1 hour, 1 kilometer traveling checklist at the optimal time of day for each species. [Learn more](#)

RELATIVE ABUNDANCE



WEEK OF THE YEAR January 4



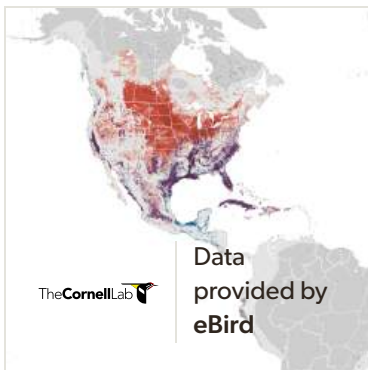
Modeled area

(0 abundance)
 No prediction [Learn more](#)

eBird data from 2009-2023.
 Estimated for 2023.

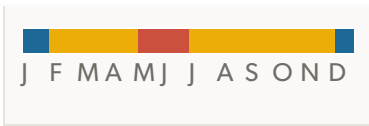
Fink, D., T. Auer, A. Johnston, M. Strimas-Mackey, S. Ligocki, O. Robinson, W. Hochachka, L. Jaromczyk, C. Crowley, K. Dunham, A. Stillman, C. Davis, M. Stokowski, P. Sharma, V. Pantoja, D. Burgin, P. Crowe, M. Bell, S. Ray, I. Davies, V. Ruiz-Gutierrez, C. Wood, A. Rodewald. 2024. eBird Status and Trends, Data Version: 2023; Released: 2025. Cornell Lab of Ornithology, Ithaca, New York.
<https://doi.org/10.2173/WZTW8903>

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Relative abundance is depicted for each season along a color gradient from a light color indicating lower relative abundance to a dark color indicating a higher relative abundance. Relative abundance is the estimated average count of individuals detected by an eBirder during a 1 hour, 1 kilometer traveling checklist at the optimal time of day for each species.

SEASONS TIMELINE



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Understanding multi-hazard risk for U.S. coastal cities

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ABSTRACT

Coastal cities are threatened by a wide range of hazards, including sea-level rise, erosion, storm surges, flooding, and extreme weather events. In this study, we focus on understanding multi-hazard risk across twenty coastal cities in the United States by accounting for a range of potential hazards, socioeconomic conditions, adaptive capabilities, and infrastructure vulnerability. We employ a Multi-Hazard Risk Index by analyzing in situ ground observations, remotely sensed information, and re-analyzed datasets. We explore the interplay between hazards, exposure, and vulnerability. Across the selected twenty cities, our results show substantial variation in risk levels, ranging from 40 to 80. We notice that Gulf Coast cities (New Orleans and Miami) experience higher sea-level risk trends, while West Coast cities (Los Angeles and San Francisco) show comparatively lower exposure. Northeastern Atlantic cities (New York and Jersey City) face higher vulnerability, while Southeastern Atlantic cities, such as Charleston, show lower vulnerability, reflecting differences in susceptibility and adaptive capacity. These relative risk scores provide city planners and policymakers with important insights and a framework to assess their city's risk levels and make informed decisions for targeted resilience strategies.

1. Introduction

Coastal cities worldwide represent critical nexuses of human activity, economic production, and infrastructure development [1,2]. These cities concentrate populations, economic assets, and critical infrastructure in areas that facilitate maritime trade, which accounts for over 80 % of global merchandise volumes, while generating trillions in economic value annually through port activities and coastal commerce [3]. Globally, over two billion people live in near-coastal zones, with almost 900 million residing in Low-Elevation Coastal Zones (LE CZ) [4]. The global increment of sea-level rise (SLR) rate has been dramatic. A noticeable three-fold increment is observed, from an average of 1.4 mm/yr in the 20th century to the current rate of 4.5 mm/yr, which has produced around 105 mm of rise since 1993 [5]. Future projections show that an additional 10–12 inches of rise 2050 for the United States (U.S.) coastline, with varying values for the West Coast (4–8 inches) and the Gulf Coast (14–18 inches) [5,6]. Coastal metropolitan areas face heightened vulnerability to multiple environmental hazards, including SLR, storm surges, coastal flooding, erosion, and intensifying extreme weather events [7,8]. Over 2.2 million of the U.S. population and \$106 billion in property are projected to be at risk of coastal hazards by 2050 because of their location on land below one meter above high tide [9]. Adaptive planning and resilience investments rely on multi-hazard risk assessment that can address the unique challenges of increasingly dynamic environmental extremes [10,11].

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Coastal hazards often interact and compound to create cascading effects that significantly amplify risks beyond simple additive relationships [12]. However, traditional single hazard approaches fundamentally underestimate actual risks [13]. Compound coastal flooding from combined storm surge and heavy precipitation is projected to increase significantly along U.S. coastline, with the frequency of joint flooding events having already doubled in major coastal cities since the 1950s [14]. These multi-hazard scenarios occur when different threats affect the same area simultaneously or consecutively, or when the same type of threat occurs in rapid succession [15]. For example, sequential tropical cyclones impacting the same location within 15 days can reduce return periods from 10 to 92 years to just 1–3 years along U.S. East and Gulf Coasts, creating unprecedented risk profiles that heavily challenge traditional assessment methodologies [16].

Hazard interactions with critical infrastructure can trigger chain reactions throughout urban systems, amplifying risks beyond simple additive relationships [12]. For example, coastal flooding can directly inundate critical infrastructure such as power plants and aerodromes located in the LECZ [15], that can disrupt their operations, leading to cascading failures across interconnected urban systems [17]. Similarly, dense road networks are crucial for emergency evacuations, and their concentration in flood-prone LECZ areas means they are highly susceptible to being compromised simultaneously, creating bottlenecks and hindering response efforts [18]. Disruptions to key infrastructures, like emergency shelters in the LECZ, can further compound these risks by making critical services inaccessible during flooding events.

Coastal vulnerability assessment has evolved over time. Early foundational work included the United States Geological Survey's (USGS's) Coastal Vulnerability Index, focusing exclusively on SLR impacts [19], and the Social Vulnerability Index (SVI), which became the predominant framework for assessing socioeconomic vulnerability to environmental hazards [20]. Federal agencies subsequently developed more extensive platforms such as National Oceanic and Atmospheric Administration (NOAA)'s Digital Coast Initiative and Federal Emergency Management Agency (FEMA)'s Hazus software [21,22]. Recent advances include comprehensive compound flooding risk analyses for major U.S. cities [14], multi-hazard risk models for European coastal cities [23], and nationwide assessments such as FEMA's National Risk Index (NRI) incorporating 18 hazards with historic loss estimates [24], among others. Our Multi-Hazard Risk Index (MHRI) builds upon decades of Multi-Criteria Decision-making (MCDM) approaches [25,26] and its integration with Geographic Information System (GIS) for spatial risk assessment [27,28]. The weighted overlay approach we employ has been validated in coastal vulnerability contexts [29–31].

Despite these advances, significant implementation barriers limit the practical application of multi-hazard frameworks in municipal planning contexts. A critical limitation is the geographic-scale mismatch between existing frameworks and municipal planning needs. For example, the NRI operates primarily at county and census tract levels rather than city boundaries, creating fundamental disconnects between assessment units and actual planning jurisdictions. Counties often encompass vast areas with highly heterogeneous risk profiles, for example, Miami-Dade County includes both highly vulnerable coastal areas and safer inland zones yet receives a single county-level risk score. This mismatch is particularly problematic given that the Disaster Mitigation Act of the year 2000 requires cities to develop FEMA-approved hazard mitigation plans [32], forcing city emergency managers to translate county-level risk data to fulfill municipal-level planning requirements.

Most existing approaches require technical expertise and computational resources beyond typical municipal capacity, demanding cities to independently collect extensive datasets and manually process information according to prescribed methodologies [33]. Additionally, many frameworks suffer from poor user interface design and lack intuitive, practitioner-friendly tools that municipal planners can readily adopt without extensive training. Validation concerns further compound these challenges, as uncertainty about model accuracy and reliability makes it difficult for practitioners to confidently apply results in high stakes planning decisions. To address this implementation barrier, our framework prioritizes transparency and reproducibility, utilizing exclusively publicly available datasets and providing open-source code to enable local adaptations and validations. The varying availability and quality of data across cities further hinders standardized multi-hazard assessments [23]. Fundamental challenges that limit multi-hazard implementation can stem from governance complexities, insufficient knowledge of multi-hazard interactions, existing single-hazard institutional approaches, difficulties in translating science to policy, and lack of integrated data [34]. This creates a persistent science-policy gap where sophisticated risk assessment frameworks are still inaccessible for practical municipal planning applications. Cities like New York, Miami and San Francisco, for example, have established dedicated resilience offices that require city-specific risk data to find the local context and drivers of social vulnerability [35], yet they must often rely on standardized, county-level assessments that obscure these critical intra-urban variations. This study employs the MHRI framework which integrates multiple dimensions of hazards, exposure, and vulnerability through a varied indicator approach. We conduct several sensitivity analyses, offering critical insights for adaptation planning and policy development.

2. Study area

The concentration of population and economic activity in U.S. coastal areas creates an unprecedented exposure to coastal hazards. Currently, 129 million Americans—representing 40 % of the total population—live in coastal counties that comprise less than 10 % of the nation's land area [36]. These coastal communities generate \$10 trillion annually in goods and services, are the workplace of 54.6 million people, and produce \$4 trillion in wages annually, emphasizing their critical economic importance [37]. This development pattern has intensified dramatically over recent decades, with coastal housing units increasing by 126 % between 1960 and 2008, as approximately 2000 homes per day have been constructed in coastal areas since 1970 [38]. The coastal concentration continues to intensify, accounting for 79.3 % of national population growth from 2000 to 2016 [39].

Fig. 1 provides a composite visualization of the twenty selected coastal metropolitan cities analyzed in this study, spanning the Pacific, Gulf, and Atlantic Coasts. Given the vast geographic distance between sites, the city boundaries are extracted and presented at

a uniform scale (refer 0–20 km scale bar) to facilitate high-resolution comparison of urban footprints and internal population density gradients. The top-left inset map provides the regional context, indexing each city group (1–7, 8–16, and 17–20) to its respective coastline.

The population density within this map provides rationale for the selection of these study areas. Geospatial boundary data for the

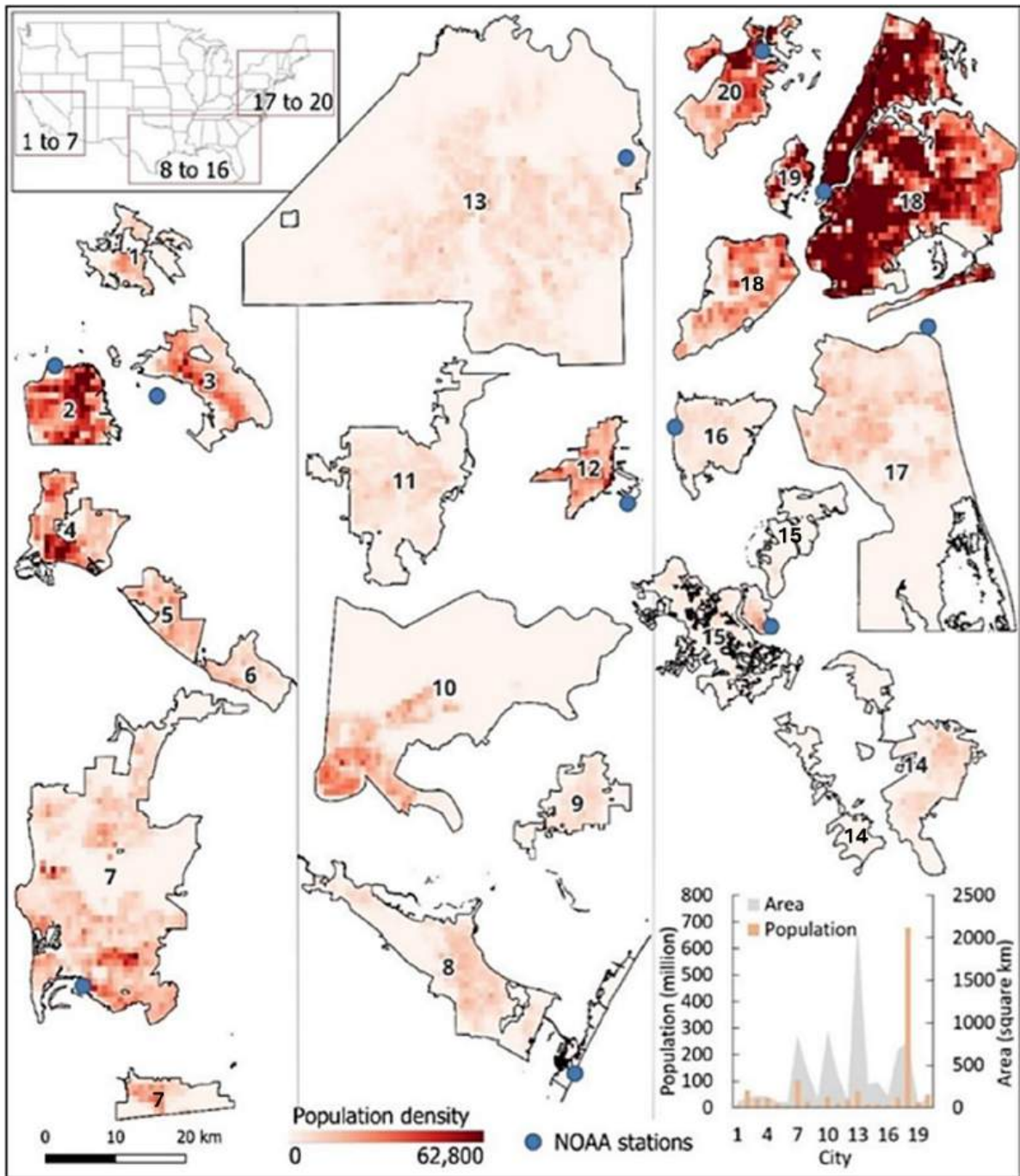


Fig. 1. Composite map of the twenty coastal-metro study areas showing population density and NOAA station locations. Individual city boundaries are arranged from the Pacific Coast to the Atlantic Coast at a uniform scale. The top-left inset map provides the regional context, indicating the geographic origin of each city group (1–7, 8–16, and 17–20) within the United States. Heatmaps represent population density, with NOAA tide gauge stations marked by blue circles. Multiple labels are provided for fragmented polygons to ensure clear identification of all city components. The bottom-right inset illustrates the relative land area and total population for each city. Pacific Coast (1: Richmond, 2: San Francisco, 3: Oakland, 4: Long Beach, 5: Huntington Beach, 6: Newport Beach, and 7: San Diego, CA). Gulf Coast (8: Corpus Christi, TX; 9: Lake Charles, 10: New Orleans, LA; 11: Mobile, AL). Atlantic Coast (12: Miami, and 13: Jacksonville, FL; 14: Savannah, GA; 15: Charleston, SC; 16: Wilmington, NC; 17: Virginia Beach, VA; 18: New York, NY; 19: Jersey City, NJ; and 20: Boston, MA).

study cities were obtained from the U.S. Census Bureau [32], and the relative proximity of NOAA tide gauge stations is indicated to show the data sources used for various coastal hazards analysis. Many of these regions are currently experiencing significant land subsidence, which further exacerbates the risks associated with relative sea level rise [5]. By 2050, sea levels are projected to rise by 0.2–0.3 m that can further amplify flooding, storm surge inundation, and coastal erosion [40]. Murray et al., [41] highlights how the combination of weather events, topography, and development patterns create complex vulnerabilities in coastal regions.

3. Materials and methods

3.1. Methodological framework

We follow a comprehensive indicator-based framework that integrates hazard, exposure, and vulnerability components following the International Panel on Climate Change Sixth Assessment Report risk conceptualization [42,43]. Our indicator-based approach follows established multi-criteria evaluation principles for risk assessment [27], employing weighted linear combination—the most widely applied MCDM technique in GIS contexts due to its transparency and computational efficiency [44]. This methodology aligns with proven coastal vulnerability index frameworks that aggregate multiple risk dimensions through normalization and weighted summation [45,46]. Fig. 2 shows various indicators taken in this study. Those indicators are divided into the four categories; which are hazard, exposure, susceptibility and adaptive capacity. The aggregated mean values of all parameters, also known as categorical score hereafter, within each category, are utilized to obtain the overall risk for a city. The multiplication of hazard score with that of exposure constitutes physical risk whereas the ratio of susceptibility to adaptive capacity denotes the vulnerability of the community to fight against the physical risk. These categorical scores are directly used in the MHRI formula to obtain the overall risk score for a city. For the list of parameters and their detailed quantification procedure, please refer to Supplementary Table S1–S4.

3.1.1. Hazard indicators

U.S. coasts are projected to experience 0.3 m of additional SLR by 2050 [40]. We categorize hazards into three distinct groups: (i)

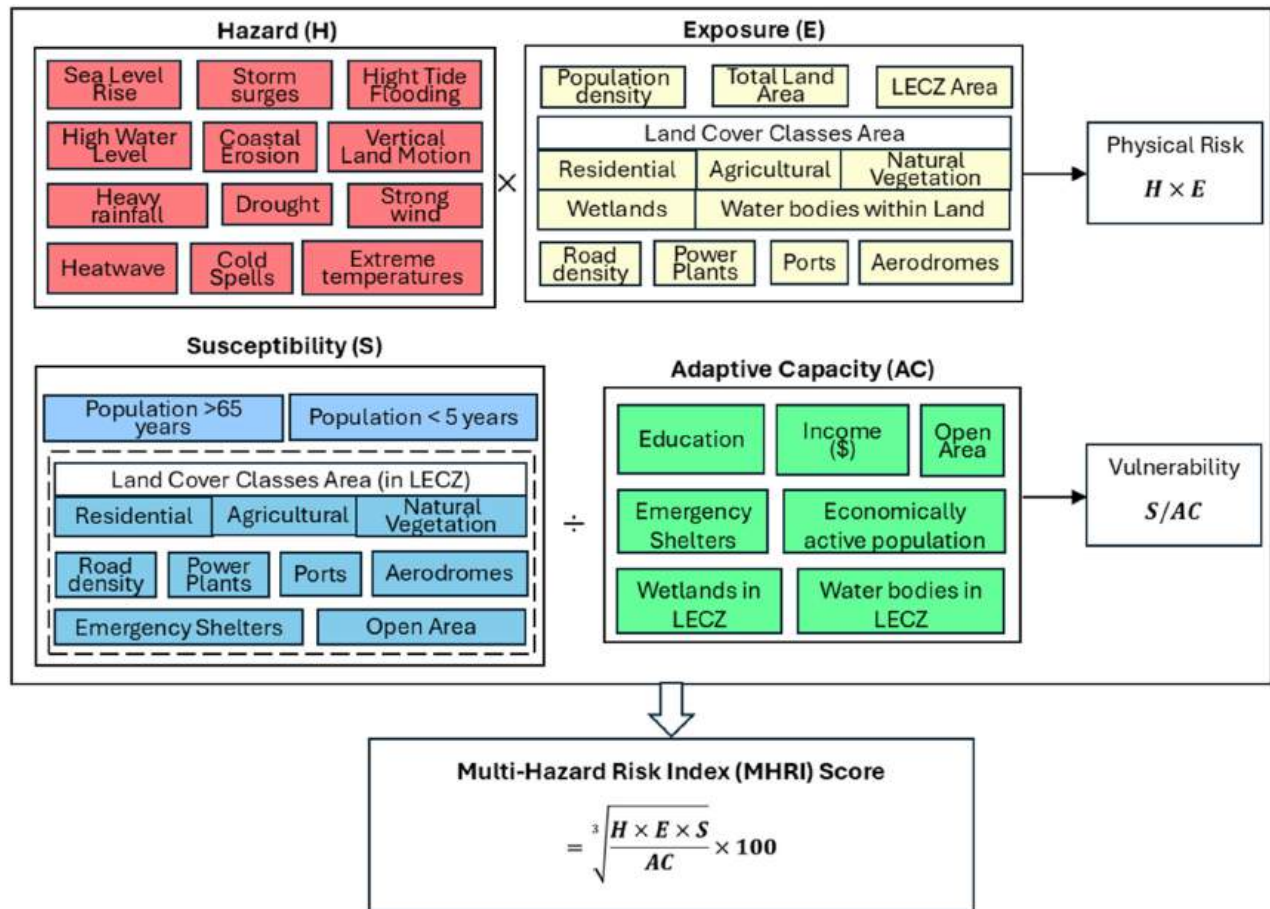


Fig. 2. Multi-Hazard Risk Index framework illustrates the parameters of four categories, viz. hazard (red), exposure (yellow), susceptibility (blue) and adaptive capacity (green). Parameters within dotted boxes are computed twice, once for the entire city and again specifically for the Low Elevation Coastal Zone (LECZ) to quantify spatial vulnerability weightage.

coastal (SLR, storm surge, flooding), (ii) geomorphological land-motion (erosion, subsidence), and (iii) hydrometeorological extremes (precipitation, drought, temperature, winds). We transform each hazard into standardized indicators derived from authoritative datasets.

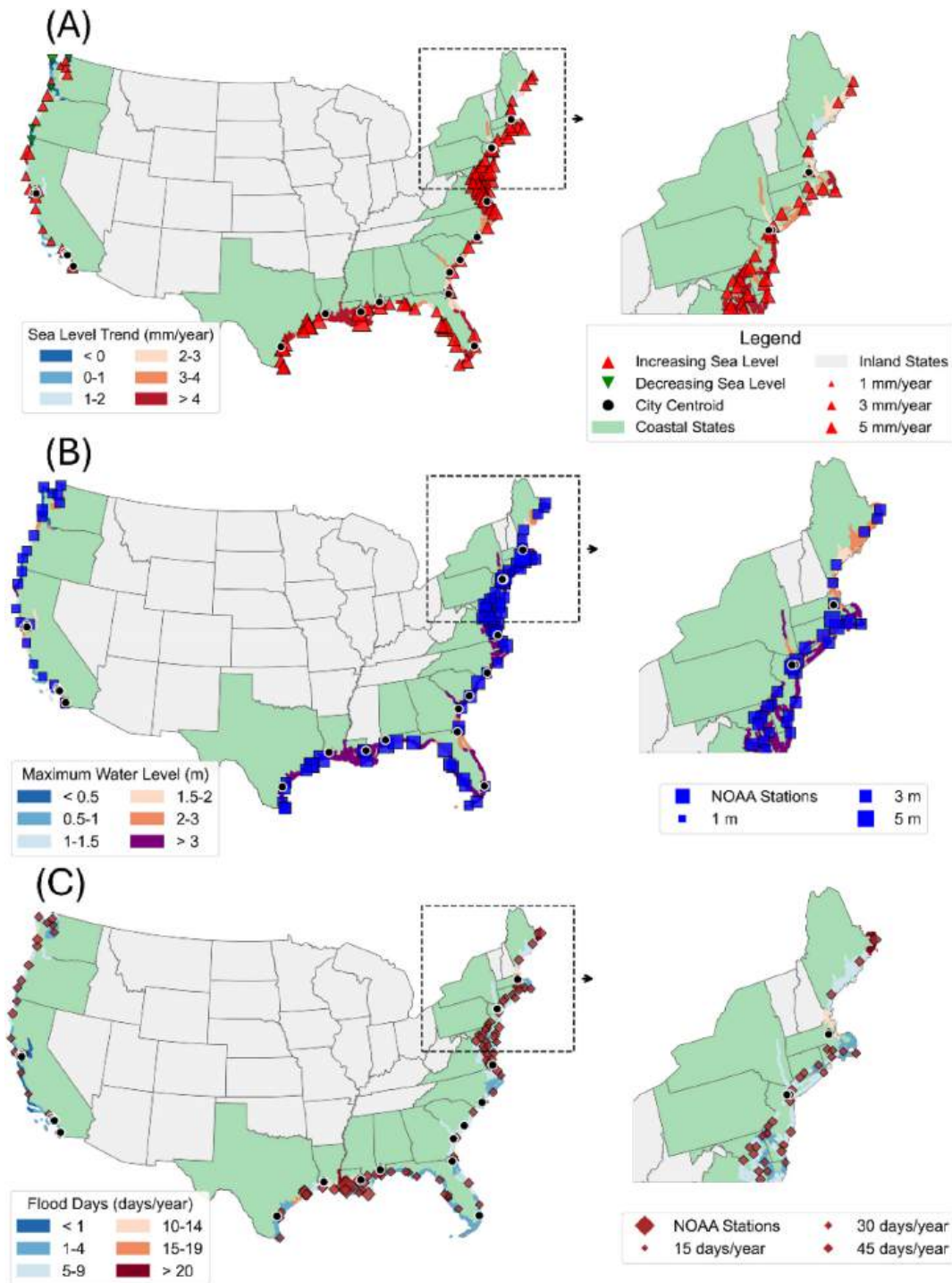


Fig. 3. Coastal hazard indicators along the U.S. coastline. (A) Mean Sea Level Trend (mm/year) observed along the Gulf Coast and Mid-Atlantic; highest rates (>4 mm/year) observed along the Gulf Coast and Mid-Atlantic. (B) Maximum water levels above Mean Higher High Water (MHHW) (m) with blue squares, indicating magnitudes (1–5 m); Gulf Coast and Atlantic seaboard showing highest levels (>3 m). (C) Annual High Tide Flood Days (HTFD) (days/year) with diamond markers showing increasing flood frequency (15–45 days/year); highest frequencies (>20 days/year) concentrated in the Mid-Atlantic and Gulf Coast. Coastal regions are highlighted in light green. The insets show detailed views of the Northeast region.

3.1.1.1. *Coastal hazards.* We analyze three indicators: (i) SLR trends (mm/year), (ii) high water levels above Mean Higher High Water (MHHW) (m), and (iii) annual high tide flooding frequency (days/year), refer Fig. 3. SLR is quantified using NOAA's established mean sea level trends derived from 117 long-term tide stations along U.S. coastlines [5,47]. An example of the long-term historical observation data, and current relative sea level rise trend in meters for a representative tidal station near Boston city is shown in Supplementary Fig. S1. These trends represent relative sea level change, incorporating both global eustatic SLR and local vertical land motion effects. For high water levels, we utilize NOAA's monthly highest water level data, which captures potential inundation depths during extreme events [48]. High tide flooding frequency is assessed using Annual High Tide Flood Outlook [49], where flooding occurs when water levels exceed locally established nuisance thresholds. These chronic inundation events can disrupt daily activities even without storms, serving as critical indicators of future vulnerability [50] (refer Fig. 4).

3.1.1.2. *Coastal hazard value assignment.* To address the limited spatial distribution of NOAA monitoring stations, we use a systematic approach to assign hazard values. We utilize NOAA's Continually Updated Shoreline Product for the Atlantic, Gulf, and Pacific Coasts as baseline; segmented continuous coastline into discrete linear features of approximately equal length (2 km at the equator). We then

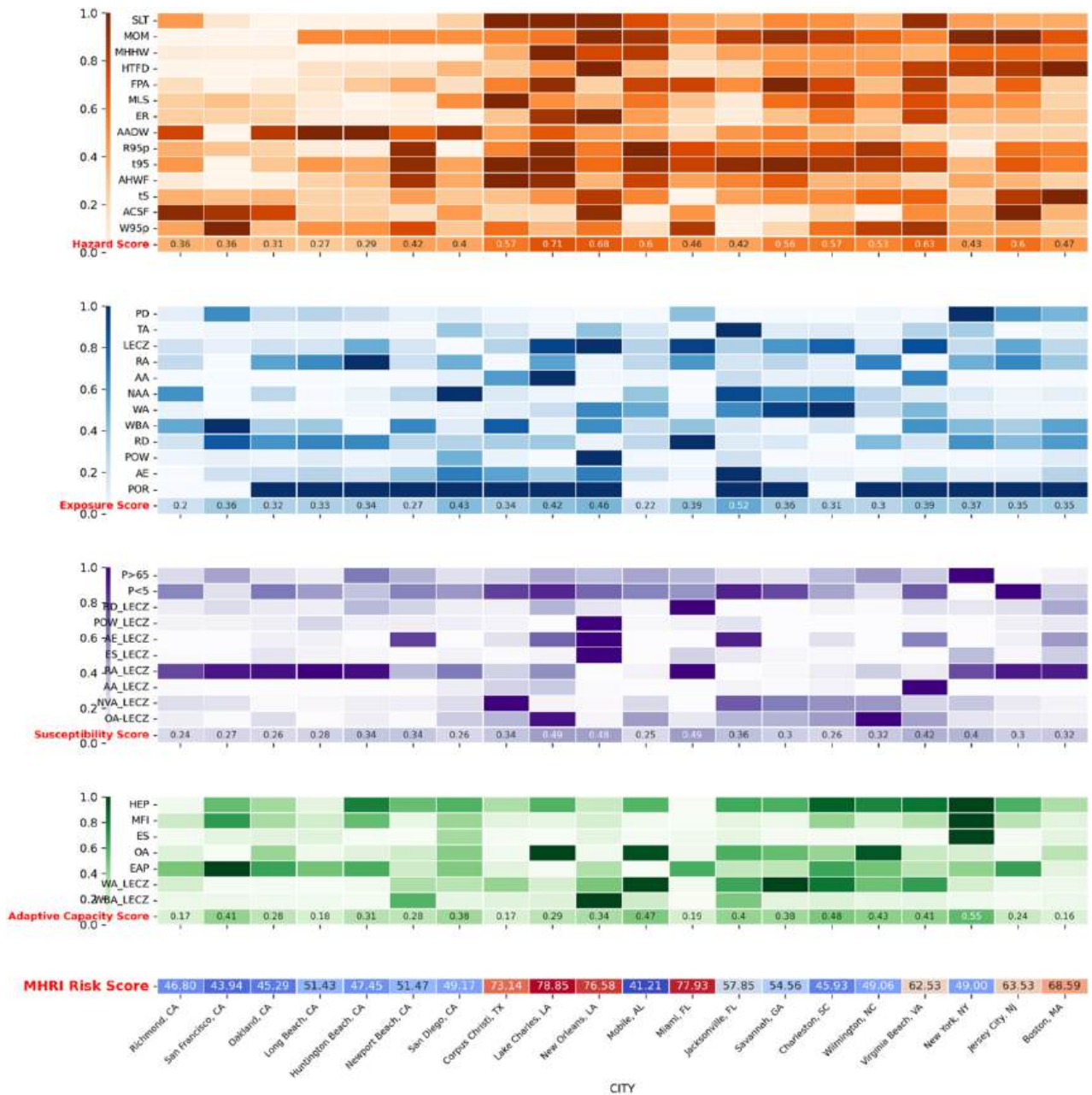


Fig. 4. Heat map summarizes the normalized values of parameters across various categories, along with their respective category scores and the final overall risk score.

establish spatial relationships by snapping NOAA tide gauge stations to nearest shoreline points using the nearest neighbor algorithm [51]. We then apply the nearest station approach where each coastal segment inherited values from the proximally closest NOAA station; leverage spatial autocorrelation inherent in coastal processes. We finally compute a length-weighted average of all shoreline segments intersecting each city's administrative boundary.

This approach sets up spatial relationships between measurement stations and coastal features, segments the coastline into discrete units, and assigns hazard values using the nearest station method. For city-level analysis, we then compute length-weighted averages of shoreline segments intersecting each city's administrative boundary, enabling robust cross-city comparison regardless of monitoring station proximity. We incorporate flooded areas through percentage of cities within FEMA's 100-year flood zones AE (base flood elevation calculated) and A (without detailed base flood elevation data) to quantify spatial flood risk [52]. Additionally, we use National Hurricane Center's Maximum of the Maximum storm surge grids derived from the Sea Lake and Overland Surges from Hurricanes (SLOSH) model to capture potential hurricane-driven coastal flooding, which accounts for nearly half of all hurricane-related fatalities since 1963 [53]. For each city, we extract the maximum inundation depth (m) from Category-1 HIGH grids, providing a physically modeled worst-case complement to empirical tide-gauge extremes.

Looking at the spatial distribution, SLR rates show strong regional variations, with the highest rates (>4 mm/year) concentrated along the Gulf Coast and Mid-Atlantic regions. Maximum water levels above MHHW show similar regional patterns, with the Gulf Coast and Atlantic seaboard experiencing the highest levels (>3 m). High tide flooding frequency is higher in the Mid-Atlantic region, where some areas experience more than 20 flood days annually. Please refer to [Supplementary Table S5](#) for the quantified values of these coastal parameters.

3.1.1.3. Vertical and horizontal ground motion (subsidence and coastal erosion). We assess geomorphological hazards, in particular horizontal shoreline movement (coastal erosion) and vertical land motion (subsidence). Coastal erosion rates are derived from the USGS National Assessment of Shoreline Change project [54], measured in meters per year at 50-m spaced transects. We treat shoreline erosion as a positive risk factor while setting accretion values to zero. Vertical land motion is quantified using Interferometric Synthetic Aperture Radar (InSAR) derived subsidence datasets [55,56], measured in mm/year and capturing both regional and localized vertical deformation. Subsidence directly exacerbates flooding risks and amplifies relative SLR impacts, while uplifting, though seemingly beneficial, can still create challenges through altered drainage patterns and infrastructure stress [57]. Thus, for each city, we compute spatially representative values using boundary-constrained averaging techniques. Erosion rates are extracted at 50-m interval transects along shoreline. For each city, the mean erosion rate was computed by averaging values across all transects within boundaries; ensured statistical significance by requiring a minimum of 10 measurement points per city. Similarly, InSAR-derived datasets are processed at native resolution (typically 30–100 m pixels), then persistent scatterer and small baseline methods were applied for temporal coherence, and finally city-level values are calculated using area-weighted averaging to account for spatial variability, and local subsidence hotspots are identified using cluster analysis. Finally, erosion and subsidence values are standardized to common scale (0–1) for integration into multi-hazard framework, spatial correlation analysis is performed to identify areas experiencing both horizontal and vertical land movement, and a combined metrics provide comprehensive evaluation of dynamic coastal processes contributing to overall vulnerability.

3.1.1.4. Hydrometeorological extremes. We incorporate key hydrometeorological extremes including heavy rainfall, drought conditions, temperature extremes (heatwaves and cold spells), and strong wind events which could affect urban infrastructure, public health, and ecosystem stability [58]. For extreme precipitation, we analyze daily precipitation datasets (1980–2024) using the 95th percentile threshold to capture local climate variability [59]. Drought conditions are assessed using the U.S. Drought Monitor data (2000–2024), with the Drought Severity and Coverage Index (DSCI) methodology [60] applied to quantify both intensity and spatial extent. $DSCI = (\% \text{ area in } D0 \times 1) + (\% \text{ area in } D1 \times 2) + (\% \text{ area in } D2 \times 3) + (\% \text{ area in } D3 \times 4) + (\% \text{ area in } D4 \times 5)$, where D0–4 are drought categories (refer [Supplementary Table S1](#) for details). This weighted sum accounts for both spatial coverage and intensity of drought conditions. A week is classified as a drought week if $DSCI > 100$ (equivalent to 50 % area in D2 or 33 % area in D3).

Temperature extremes are derived from the Daymet dataset [61], defining heatwaves and cold spells as three consecutive days exceeding the 95th and 5th percentile thresholds, respectively. City-specific thresholds were derived from 1980 to 2024 temperature records. Strong wind intensity was quantified using the fifth generation of European Centre for Medium-Range Weather Forecasts atmospheric reanalysis (specifically ERA5-Land) [62], with average wind speed calculated for days exceeding the 95th percentile of resultant wind speed. [Fig. S3](#) provides a synopsis of these hydrometeorological extremes for Boston.

3.1.2. Exposure indicators

We incorporate three exposure indicators: (i) spatial characteristics, (ii) land use distribution, and (iii) critical infrastructure presence. The spatial characteristics include total land area as a foundational metric, population density to assess human concentration and evacuation challenges during extreme events [4], and LECZ extent, defined as land having elevation below 5m [63], which serves as a critical exposure parameter for coastal areas. Land use distribution is assessed using the 30-m resolution National Land Cover Database (NLCD) 2021 dataset [64] to quantify residential, agricultural, natural vegetation, wetland, and water body coverage. The reclassifications to these categories from the official NLCD classes are described in [Supplementary Table S2](#). This analysis provides insights into the spatial distribution of different land types exposed to coastal hazards, with implications for both human settlements and ecosystem services.

Critical infrastructure exposure is quantified through the presence of three key infrastructure types: energy generation facilities

(power plants), transportation nodes (roads and aerodromes), and maritime commerce centers (principal ports). These infrastructure elements are significant economic assets with potential for disruption during hazard events. Detailed methodologies for exposure indicator calculation and classification, as well as dataset description, are provided in [Supplementary Table S3](#).

3.1.3. Vulnerability indicators

3.1.3.1. Susceptibility indicators. Susceptibility indicators capture inherent vulnerabilities within urban systems. Demographic susceptibility is represented by populations with limited mobility during disasters specifically, the elderly (over 65 years) and young children (under 5 years) who exhibit heightened vulnerability due to increased dependence on external support during hazard events [65]. The presence of critical facilities within the LECZ areas highlights the infrastructure's susceptibility. Power plants located in LECZ serve as primary vulnerability markers because electricity failures can trigger cascading disruptions across multiple systems [17]. Similarly, aerodromes, emergency shelters, and road networks within LECZ represent potentially compromised critical services during coastal flooding events. Land use vulnerability is quantified through the percentage of residential, agricultural, natural vegetation, and open areas, located within LECZ boundaries. These metrics inform human settlements and productive lands at heightened risk from SLR and coastal flooding.

3.1.3.2. Adaptive capacity indicators. Adaptive capacity reflects a city's ability to respond to and recover from hazardous events. Socioeconomic resilience is assessed through higher education attainment, median family income, and economically active population—metrics derived from the U.S. Census Bureau's American Community Survey that indicate financial resources available for protective measures and recovery efforts [66]. The normalization and aggregation methodology follows standard GIS based Multi-Criteria Decision Analysis procedures established in the literature [67,68]. Our min-max normalization approach is consistent with coastal vulnerability assessments by Sahoo & Bhaskaran (2018) which makes sure that all indicators contribute proportionally regardless of measurement units [69]. Emergency response capacity is computed through the number of emergency shelters, providing direct measurement of a city's ability to accommodate displaced populations during hazard events. Natural buffering capacity is assessed through wetlands and water bodies within LECZ areas, which provide critical ecosystem services including flood mitigation, wave attenuation, and storm surge reduction [70]. [Fig. S4](#) in the supplement section illustrates the maps showing various parameters.

3.2. Multi-Hazard Risk Index (MHRI)

The normalization value for each indicator (N_i) is obtained as follows:

$$N_i = \frac{I_i - I_{i,min}}{I_{i,max} - I_{i,min}} \quad [1]$$

where, I_i represents the raw value of the i -th indicator for each city, with $i = 1, 2, \dots, N$, where (N is the total number of indicators), $I_{i,min}$ and $I_{i,max}$ are the minimum and maximum values recorded for the i -th indicator across the benchmarking cities, and $I_{i,min}$ and $I_{i,max}$ are equal to 0 and 1, respectively.

The indicators are grouped into four key categories: hazard (H), exposure (E), susceptibility (S), and adaptive capacity (AC), following the multi-dimensional risk framework proposed by Birkmann et al. [71]. The normalized partial score is calculated for each category as:

$$A_{P_k} = \frac{\sum_{i \in P_k} N_i}{n_{P_k}} \quad [2]$$

where, P_k represents the parameter category ($P_k \in \{H, E, S, AC\}$), N_i is the normalized value of the i -th indicator within the parameter, and n_{P_k} denotes the total number of indicators (P_k) used. This method ensures that indicators within each category are equally weighted and aggregated, preserving consistency across parameter evaluations. The category-wise scores are then integrated into a unified Multi-Hazard Risk Index (MHRI) for each city:

$$MHRI = \sqrt[3]{\frac{H \times E \times S}{AC}} \times 100 \quad [3]$$

where, H quantifies the magnitude and frequency of natural hazards, E represents the level of population, infrastructure, or assets exposed, S measures the city's sensitivity or likelihood of adverse impacts, and AC encapsulates the capacity to adapt to mitigate or recover from hazards. Cube root transformation is applied to balance the multiplicative effects of the risk components while maintaining their mathematical relationship [72]. This approach aligns with established risk assessment methodologies [20,73] that employ transformations to normalize composite indices and prevent extreme values in individual parameters from disproportionately influencing the final risk score. Such transformations enhance the interpretability of risk indices when comparing different geographic contexts [74]. This aggregation structure reflects hierarchical MCDM principles [75], where sub-indices are computed before final integration, enabling component-specific validation and policy targeting as demonstrated in multi-scale coastal frameworks [30,76].

In addition, we document reports and literature published by key institutions such as the City Planning & Development Agency, the

City Environment Department, and the Office of Emergency Management to verify computed MHRI outcomes.

3.3. Sensitivity of the risk index

Robust risk assessment frameworks require systematic evaluation of how variations in key environmental parameters affect overall risk profiles [77]. To address this, we perform a scenario and sensitivity assessment, in line with established multi-hazard risk modeling principles [78,79]. It provides stakeholders with clarity on which parameters significantly impact the city's overall risk to guide effective prioritization of resources [80]. This specialized analysis focuses on three critical coastal hazard variables: (i) SLR, (ii) storm surge levels, and (iii) HTFD.

We run several scenarios with reference to a controlled baseline value. For Relative SLR, we incorporate NOAA projections under multiple emission pathways (low, medium, high) for the years 2030–2100, spanning increases of 0.3 m, 0.5 m, 1.0 m, 1.5 m, and 2.0 m relative to the 2000 baseline [5]. For Maximum Storm Surge Depth, we use the Maximum of Maximums dataset from NOAA's SLOSH model, which provides surge simulations across hurricane Categories 1–5. And, data from 37 operational SLOSH basins are referenced to the highest storm surge levels from model-simulated hurricanes [81]. Finally, for HTFD, projected values from NOAA tidal stations are processed using NOAA outlook classifications (Low, Intermediate-Low, Intermediate, Intermediate-High, and High) for 2030, 2040, and 2050. These projections incorporate spatial interpolation, mapping onto segmented shoreline lines, and integration into a comprehensive shoreline dataset for the U.S. [49]. We finally normalize all substituted values for each scenario, consistent with the procedure applied to baseline variables. Furthermore, to gain deeper insight into threshold effects and non-linear responses, we conduct a comprehensive sensitivity analysis by varying each parameter in 5 % intervals across a $\pm 20\%$ range, the result for a pilot city Boston is shown in [Supplementary Fig. S5](#).

4. Results

The MHRI framework reveals distinct regional patterns across the U.S. coastline, with the Gulf Coast region exhibiting the highest mean risk scores (MHRI = 67.45 ± 26.24 , N = 4), followed by the Atlantic Coast (MHRI = 58.77 ± 12.84 , N = 9), and the Pacific Coast showing the lowest vulnerability (MHRI = 47.94 ± 4 , N = 7). These regional differences reflect documented patterns of hazard exposure, with Gulf Coast cities experiencing the most rapid relative SLR rates in the nation [5] and significant subsidence that can account for 23–35 % of total projected inundation by 2050 [40]. Importantly, within these regional patterns, local geographic and environmental factors create significant variations in risk profiles. For instance, the Gulf Coast region holds both our highest-scoring city (Lake Charles, 78.75) and lowest-scoring city (Mobile, 41.21), despite their shared regional hazard exposure. Mobile's bay location and substantial wetland coverage represent the kind of local factors that can change regional risk patterns. Similarly, the Atlantic Coast shows notable geographic variability in risk scores, consistent with previous coastal vulnerability assessments [82]. The Pacific Coast's lower risk profile with reduced variability reflects enhanced adaptive capacity indicators and reduced exposure to extreme coastal dynamics [83].

4.1. Hazard assessment

4.1.1. Coastal hazards

SLR rates show pronounced spatial variability across the continental U.S. coastline, with the highest relative rates concentrated in the Gulf Coast region (4.89 ± 1.52 mm/yr) and mid-Atlantic corridor (3.68 ± 1.13 mm/yr), where local subsidence compounds global eustatic trends. Pacific Coast cities demonstrate significantly lower rates (1.59 ± 0.88 mm/yr), thanks to their unique geological and oceanographic processes [84]. Storm surge depths showed similar regional variability. Mid-Atlantic cities face the highest threats, while Gulf cities show moderate inundation depths, with New Orleans (4.42 m) being a notable outlier. Pacific Coast cities experience minimum depth (1.74 ± 1.63 m) due to different storm climatology and coastal geomorphology [85]. The high tide flooding frequency also varied across regions, with New Orleans (10.09 days/year) and Boston (10.08 days/year) experiencing the highest annual flood days. Mid-Atlantic cities average 6.77 ± 1.85 days/year, while the Pacific Coast cities experience fewer flooding events (1.53 ± 1.19 days/year). This chronic inundation due to high tide flooding of these cities aligns with their higher values in the SLR trends.

4.1.2. Hydrometeorological extremes

Extreme precipitation shows an east-west climate divide, with Gulf Coast cities experiencing substantially more intense rainfall events than Pacific regions [86,87]. Gulf communities receive nearly three times the rainfall volume during extreme events compared to drier Pacific areas. This pattern reflects warm Gulf waters and tropical moisture pathways that fuel convective storms along eastern coasts. Temperature extremes show regional clustering. Gulf Coast cities experience the most severe heat-related hazards, consistent with recent findings that the South Coast region exhibits the most pronounced heatwave duration and nighttime intensity compared to other coastal and inland areas [88]. Meanwhile, Pacific Coast cities show higher cold spell frequency, reflecting continental climate influences and marine moderation effects [89]. Drought frequency analysis shows Pacific Coast cities face the highest vulnerability (4.24 ± 1.94 months/year) compared to Gulf Coast (2.59 ± 0.91 months/year) and mid-Atlantic regions (1.85 ± 0.76 months/year), though with notable intra-regional variation [90].

4.2. Exposure assessment

The population exposure to hazards reveals significant vulnerability concentrations. Cities like New York, San Francisco, and Jersey City show high population densities, creating substantial disaster management challenges. Assuming spatially distributed population throughout each city's area, there lies a dramatic spatial exposure variation, with New Orleans (99.56 %), Miami (92.93 %), and Lake Charles (92.30 %) having most of their area within LECZ, far exceeding the study median of 34.45 %, with more population being in constant exposure to hazard-prone areas cause significant challenges for long-term adaptation planning and emergency management [91].

Transportation infrastructure density varies significantly across cities. The dense network represents both critical evacuation infrastructure and exposed assets vulnerable to coastal hazards. The concentration of road networks in high-density urban areas creates potential bottlenecks during emergency evacuations [92]. On the other hand, the presence of other critical infrastructure also causes variation in exposure levels. Power generation facilities range from zero in several cities to 79 in New Orleans. Aviation infrastructure and maritime facilities show similar variability, with fifteen of twenty cities maintaining principal ports. This spatial distribution creates differential vulnerability to cascading failures, as damage to energy and transportation nodes can trigger widespread disruptions [17]. The selected cities show diverse exposure profiles based on their land use patterns. Residential development areas vary dramatically across cities, while agricultural exposure remains minimal, as we have taken some of the most urban centers as our cities in this pilot study. Water bodies present a critical dual function, serving as natural stormwater management systems while simultaneously creating potential flood conveyance pathways during extreme events [93].

4.3. Vulnerability assessment

4.3.1. Susceptibility indicators

Demographic vulnerability analysis shows significant age-related susceptibility patterns across cities. Elderly populations, concentrated in cities like New York and Huntington Beach, show reduced evacuation mobility, higher medical dependencies, and limited disaster recovery capacity [20]. Conversely, cities with higher proportions of young children face different evacuation challenges requiring specialized transport and shelter provisions for families with dependents. These vulnerabilities will intensify as coastal migration trends continue, with retirement-age populations moving to coastal areas while working-age populations relocate inland [39].

Infrastructure within LECZ demonstrates heightened susceptibility to operational disruption and failure. Cities like New Orleans, with 26 power plants and 67 emergency shelters in flood-prone zones, face extreme vulnerability when these critical facilities become inaccessible during the events. Road networks in LECZ show similar susceptibility variations, Miami's dense concentration (22.02 km/km²) creates higher failure risks than Virginia Beach's sparse network (0.63 km/km²). The co-location of interdependent systems in vulnerable areas amplifies failure risks, as infrastructure designed for normal operating conditions may not withstand combined stresses of flooding, power disruptions, and access limitations during extreme events. Land use composition within LECZ affects community susceptibility to hazard impacts. Cities with high residential concentration in vulnerable zones face greater displacement risks and recovery challenges. More critically, natural vegetation coverage determines protective capacity—cities maintaining substantial vegetation buffers in LECZ benefit from wave attenuation and flood absorption services, while cities with minimal natural coverage lose these protective functions, increasing their susceptibility to storm impacts [70].

Susceptibility patterns vary significantly even within similar geographical locations. The heterogeneity in susceptibility patterns transcends simple geographic clustering. New Orleans and Mobile, both Gulf Coast cities with extensive LECZ coverage, demonstrate opposite infrastructure vulnerability profiles—New Orleans concentrates critical facilities in flood zones while Mobile maintains zero power plants, aerodromes, and emergency shelters in LECZ. This stark contrast within similar geographic contexts underscores that susceptibility emerges from decades of local planning decisions, development pressures, and infrastructure investment patterns rather than regional destiny. Cities can significantly change their susceptibility through strategic infrastructure placement and land use planning, independent of their underlying hazard exposure.

4.3.2. Adaptive capacity assessment

Adaptive capacity encompasses multiple dimensions of resilience, such as educational attainment, economic resources, emergency infrastructure, and natural protective features that collectively determine a city's ability to prepare for, respond to, and recover from coastal hazards. Educational attainment varies across cities, with New York achieving the highest proportion of residents with higher education (97.5 %), followed by Charleston (95.7 %) and Virginia Beach (94.5 %), while Miami (78.8 %) and Richmond (79.4 %) show lower levels. This educational gradient influences community capacity for risk comprehension, early warning response, and participation in adaptation planning processes [94].

Economic resilience reveals extreme disparities that shape differential recovery trajectories. Median family income ranges from \$204,236 in New York to \$59,015 in Miami, with the wealthiest cities having nearly three and a half times the financial resources of the poorest. This economic stratification extends beyond simple purchasing power, influencing insurance coverage rates, ability to invest in property-level flood protection, temporary relocation capacity during disasters, and speed of post-disaster recovery [95]. The economically active population, ranging from 61.81 % in San Francisco to 46.79 % in Mobile, provides another lens on economic resilience, indicating the proportion of residents engaged in wealth-generating activities that sustain recovery efforts.

Emergency preparedness infrastructure and natural protective features provide critical adaptive capacity independent of socio-economic factors. Cities show dramatic differences in emergency shelter capacity, with some maintaining hundreds of facilities while

others have only a few, creating significant disparities in evacuation accommodation. Open spaces serve multiple adaptive functions such as stormwater infiltration, temporary shelter sites, and emergency staging areas. Natural buffers within LECZ vary dramatically, with some coastal areas like Virginia Beach maintaining substantial wetland and water coverage while others such as Miami have minimal natural protection, representing fundamentally different ecosystem-based protection levels among cities. These natural features provide wave attenuation, surge reduction, and flood absorption services that engineered solutions struggle to replicate cost-effectively [70].

Composite adaptive capacity patterns reveal concerning misalignments between hazard exposure and resilience resources. Cities facing the most severe hazards often show limited adaptive capacity across multiple dimensions. New Orleans, despite confronting extreme coastal threats, shows moderate education levels (83.3 %), below-median income (\$86,984), and relatively few total emergency shelters (67) for its size, though it maintains exceptional natural buffers (75.48 % wetlands and water in LECZ). Conversely, high-capacity cities like San Francisco combine strong socioeconomic indicators—high education (88.8 %), substantial income (\$159,981), and robust workforce participation (61.81 %)—but lack natural protective features, instead relying on engineered solutions and economic resources. This inverse relationship between hazard intensity and adaptive capacity in several Gulf Coast cities creates a vulnerability multiplier effect, where communities most needing adaptive resources possess the least capacity to develop them [96].

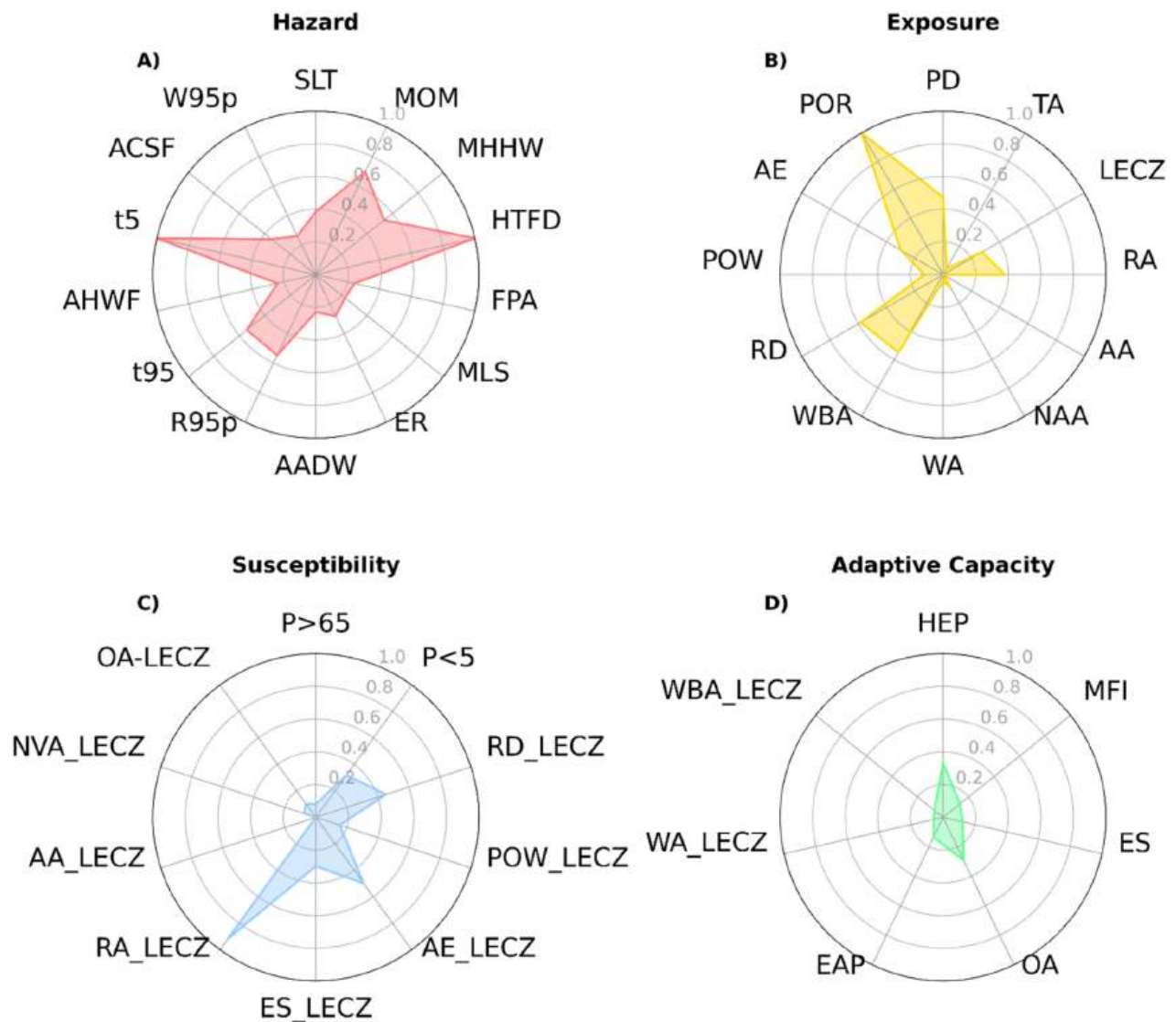


Fig. 5. Multi-dimensional risk assessment for Boston using normalized indicators (0–1 scale). A-D) Hazard, exposure, susceptibility, and adaptive capacity indicators, respectively. (refer Tables S1, S3 and S4 for details about the parameters and the abbreviations.).

4.4. Normalization of indicators and their respective scores of risks

Fig. 5 provides a synopsis of all indices for Boston. For the sake of brevity, other cities are not discussed in detail. In Boston, among hazard indicators, we could see higher scores for annual high tide flood days and heavy rainfall intensity, compared to the overall score. Similarly, in the exposure category, Boston's high scores for residential area and transportation infrastructure density are partially offset by its low LECZ, resulting in a moderate overall exposure score. Whereas, Boston's susceptibility indicators show considerable variation, with the highest score for percentage of population under five years old and presence of principal ports, but lower values for power plant presence, yielding a moderate-to-high susceptibility score. Boston shows strong adaptive capacity with high scores for median family income, economically active population, and higher education, contributing to a favorable adaptive capacity score. When compared to other coastal cities, Boston's profile is milder compared to other ends. A detailed description is provided in the supplement section featuring the salient features of Boston city.

4.5. Scenario and sensitivity analysis

The scenario analysis reveals differential sensitivity patterns across cities with varying baseline vulnerabilities. Cities were grouped into five subplots based on similar MHRI ranges to facilitate comparison. Fig. 6 demonstrates how identical sea level rise scenarios produce varying responses - for instance, while both San Francisco and Mobile show increasing risk with higher sea level rise, Mobile's MHRI increases by approximately 1.5 points compared to San Francisco's 2.5-point increase relative to their respective baseline scores (refer Fig. 7).

Fig. 6 demonstrates pronounced regional vulnerability patterns. Notably, Gulf Coast cities exhibit dramatic sensitivity to hurricane intensification—with several cities showing over 5 % MHRI increases—while Pacific Coast cities display exceptional stability with changes rarely exceeding 1 %. This disparity suggests that identical climate scenarios will create vastly different risk trajectories across U.S. coastal regions, with Gulf Coast communities facing disproportionate future vulnerabilities.

To further evaluate model stability, we paired the scenario analysis with a systematic sensitivity assessment, modulating individual parameters across a ±20% range at 5% intervals (see Fig. 7). It shows how the perturbations affect MHRI score for Boston. For example, a parameter abbreviated as AA_LECZ exhibits low sensitivity because Boston's baseline value is already at or near the minimum among all cities; consequently, even under the perturbations, its normalized value remain constant, causing no change in MHRI value across

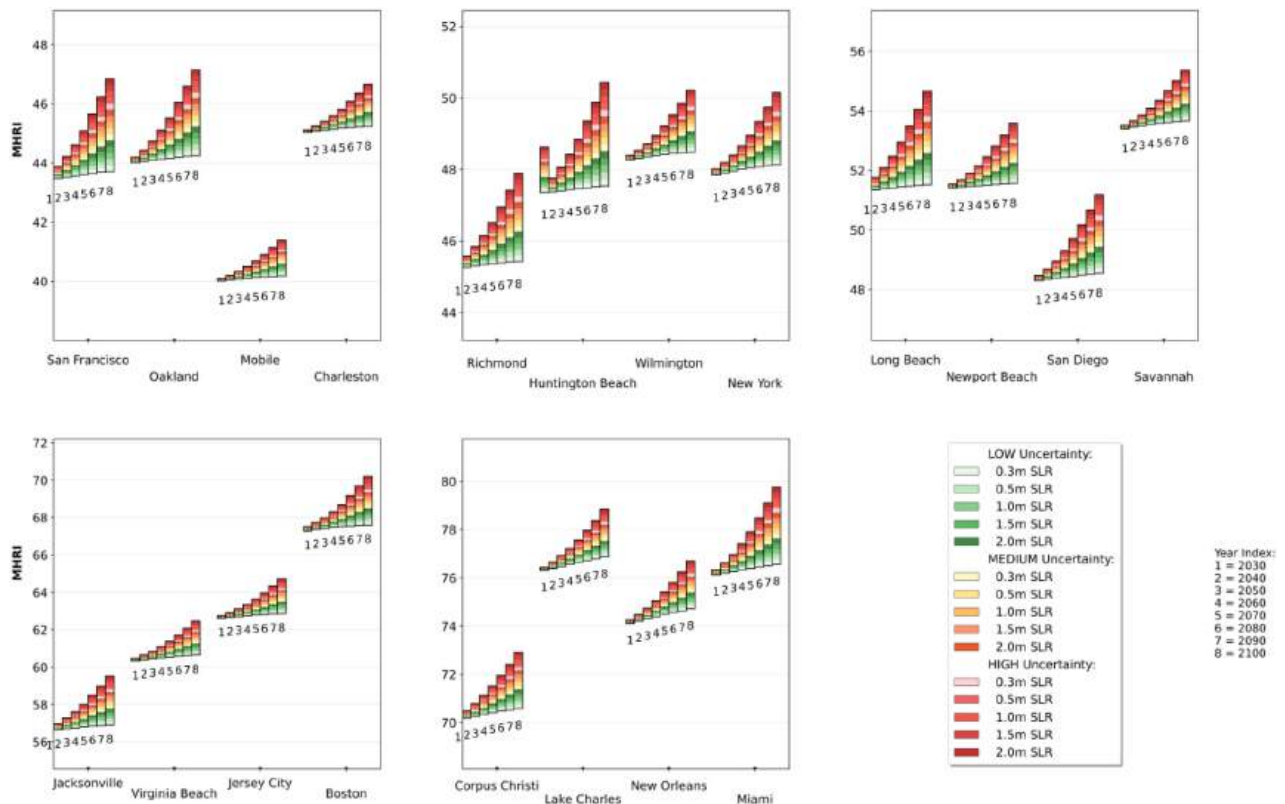


Fig. 6. MHRI Sensitivity to Sea Level Rise Scenarios (2030–2100) for 20 U.S. coastal Cities. The cities are grouped in 5 sub-plots based on the baseline risk levels, each subplot showing temporal projections under 15 SLR scenarios (0.3–2.0 m × LOW/MED/HIGH uncertainty from NOAA SLR projections). Three-band gradient bars represent uncertain families with color intensity indicating SLR magnitude. Labels 1–8 denote the decadal projections for 2030–2100.

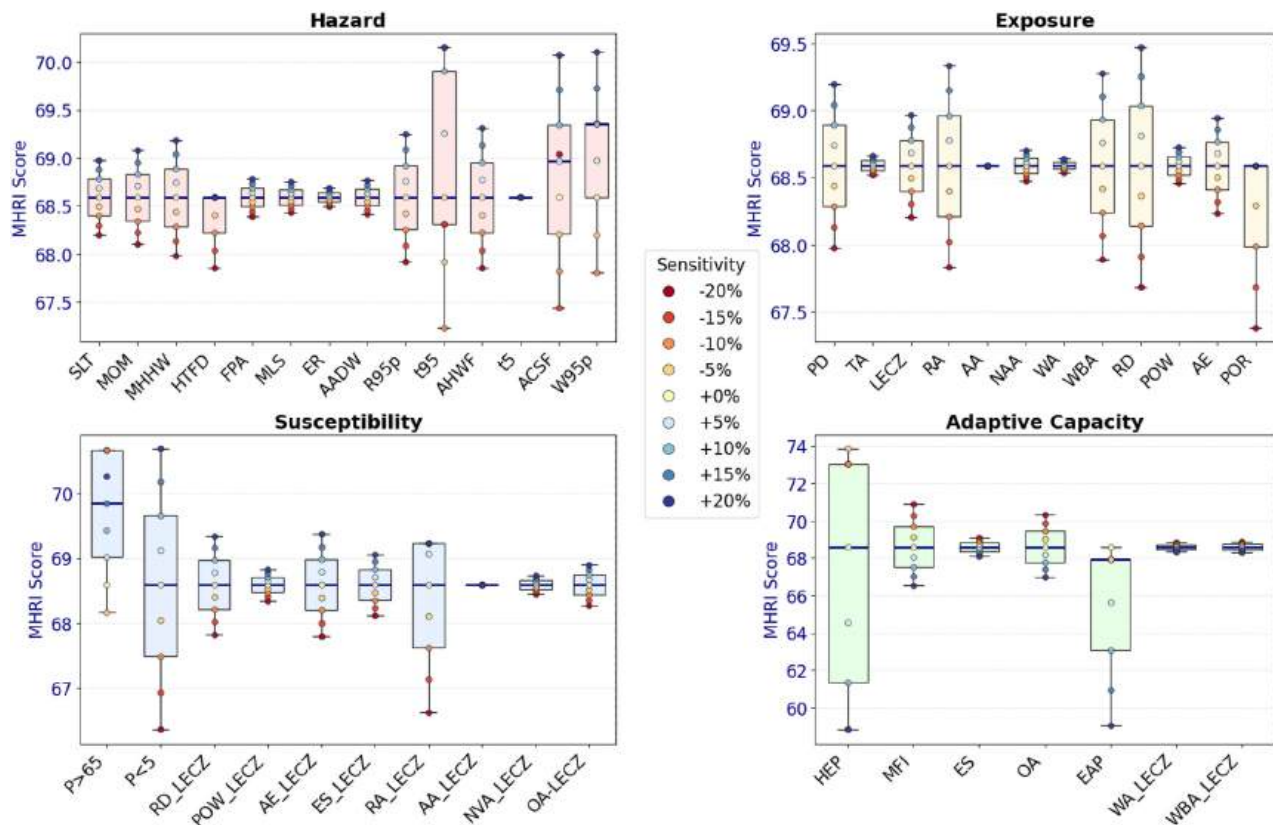


Fig. 7. Sensitivity of MHRI scores to parameter perturbations by $\pm 20\%$ with an interval of 5 % for Boston, MA. We can take away that there are several parameters in each category which are highly sensitive to changing the overall MHRI score for a city. For example, the Higher Education Population percentage if changed from 0.8 to 1.2 times its current value can alter the MHRI score as much as by 15 points. Please refer to [Supplementary Tables 1–5](#) to completely understand the abbreviations of the parameters in the figure.

all the 9 scenarios.

5. Discussion

Our analysis demonstrates that among the twenty U.S. coastal cities, Lake Charles, LA obtained the highest multi-hazard risk score (78.05) due to its higher values in the hydrometeorological and coastal hazard parameters (hazard score; 0.68, ranking: 1st), as well as the adaptive capacity score (AC score: 0.29, ranking: 9th) is not sufficient to counteract the higher ends of values in the exposure (E score: 0.42, ranking: 4th) and susceptibility scores (S score: 0.49, ranking: 3rd). These cities serve as a comprehensive pilot study domain to rigorously test our methodology's applicability, validate the analytical framework's robustness, and set up its transferability to other urban coastal areas. To enhance accessibility and practical implementation, we developed an interactive web-based application that enables researchers and practitioners to select any combination of coastal cities within the NOAA designated coastal counties of the U.S. for customized risk assessment. The framework's open-source implementation enables parameter customization. Users can adjust heatwaves thresholds from the current default of three consecutive days exceeding the 95th percentile to match local public health definitions or even modify flood prone areas definition to better suit the municipal engineering standards.

In this study, parameters of hazards, exposure, and vulnerability (susceptibility and adaptative capacity) are selected based on relevance, statistical significance, and uniqueness, avoiding redundancy [20]. For example, we include Median Family Income, and vertical land motion. We have not incorporated landslide data, though some cities in the northwest Pacific Coast are somewhat vulnerable due to steep terrains and high rainfall; however the majority of U.S. coastal cities face minimal landslide risk [97]. Overall, the framework used in this study is highly scalable and adaptable, and is applicable to other coastal cities across the U.S. and beyond. Based on requirements, indicators could be added and/or removed.

Among the cities analyzed, Lake Charles, LA recorded the highest MHRI, driven by extreme exposure levels, high population density, and recurrent flooding risks. Conversely, Charleston exhibits the lowest MHRI, due to lower exposure levels and higher adaptive capacity indicators. Cities along the Gulf Coast, such as New Orleans and Miami, show heightened vulnerability due to the confluence of natural coastal hazards coupled with recurrent meteorological extremes and socioeconomic disparities. These findings underscore the compounded risks posed by overlapping hazards, such as coastal flooding and extreme precipitation, which may further exacerbate by vertical land movement and ongoing urbanization pressures. The dramatic increase in coastal development, with structures increasing by 446 % between 1950 and 2000 [98] means that more assets and infrastructure are exposed to these

multi-hazard events. Furthermore, with coastal population growth continuing to outpace inland growth by significant margins [39], the exposure component of our risk framework would likely continue to increase, making proactive risk assessment and adaptation planning increasingly critical.

Variations in dataset resolution and projection models may introduce some uncertainties. Future research could explore ensemble modeling techniques to improve predictive accuracy and standardize spatial and temporal resolutions to minimize exposure

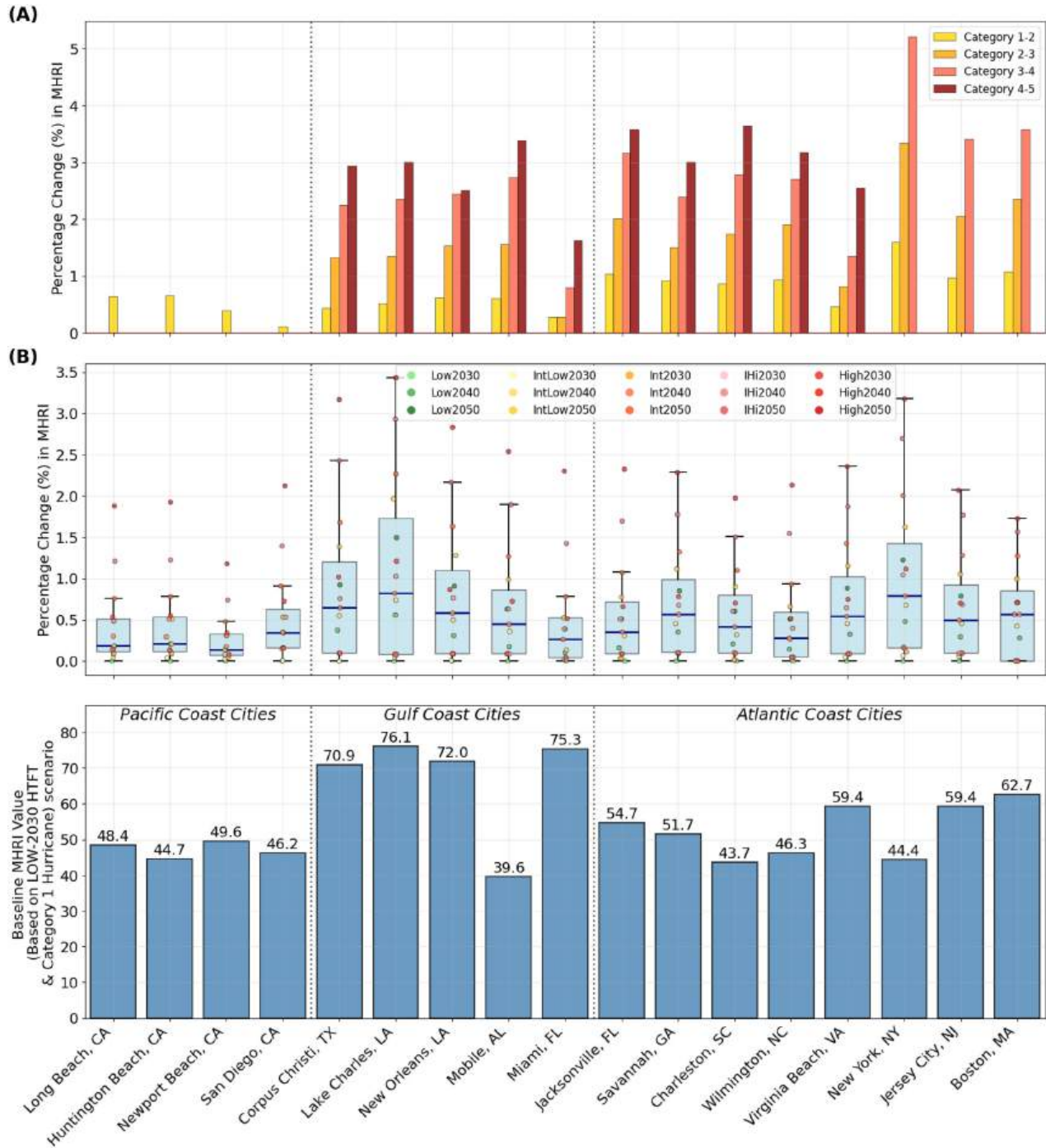


Fig. 8. Sensitivity of the Multi-Hazard Risk Index (MHRI) to storm surge and high-tide flooding scenarios; (A) The top panel shows the percentage change in MHRI resulting from increased hurricane storm surge depth intensity (Categories 2–5) relative to a Category 1 baseline. The analysis reveals significant sensitivity in Gulf and Atlantic Coast cities, while the number of bars per city reflects the availability of storm surge simulation data. (B) The middle panel displays the distribution of percentage changes in MHRI across 15 projected HTFD scenarios for 2030, 2040, and 2050, relative to a Low 2030 baseline. (C) The bottom panel shows the absolute baseline MHRI values for each city, which serves as the reference for the percentage changes in the panels above.

assessment biases. Additionally, real-time monitoring could enhance the framework's applicability for dynamic risk assessments. Our framework requires the user to download reanalyzed and updated datasets from time to time. Newer frameworks, such as the Geo-Climate Intelligence Platform, can facilitate this by offering streamlined access to additional environmental data from diverse sources, including both satellite-derived products and station-based observations [99]. The assessment of various indicators in this study aligns with earlier research [95,100], confirming known vulnerabilities while revealing new insights through its integrative approach. The reliance of some datasets like that for coastal erosion may not accurately reflect current conditions, because they are highly dynamic temporarily.

This study has not accounted for some other major threats, such as earthquakes, tsunamis, wildfires, as all the coastal cities are not equally affected by these extremes, but could be incorporated. Similarly, the presence of barrier islands and other coastal resilience structures could be accounted for in the adaptive capacity, while assessing the vulnerability of a city as these natural protection measures play a crucial role in reducing the overall risk of coastal hazards. Artificial coastal structures could also be incorporated, for example, by quantifying their lengths.

Climate change is expected to exacerbate all major coastal hazards in our framework. These changes will amplify storm surge heights, increase high-tide flooding frequency, accelerate coastal erosion rates, and intensify extreme precipitation events. Infrastructure vulnerability will also be altered, as rising sea levels will permanently inundate low-lying infrastructure in LECZ areas, while increased storm intensity will cause those structures to face forces beyond their design specifications [5]. Therefore, these compound effects are particularly concerning as our analysis shows that infrastructure concentration in flood-prone LECZ areas creates cascading failure risks when multiple systems can be compromised simultaneously during extreme events.

5.1. Uncertainty quantification and verification with National Risk Index (NRI)

To evaluate our MHRI outcomes, we conduct a comparative analysis with NRI (refer Fig. 8), though there exist methodological differences. NRI is an outcome of decades of federal investment in comprehensive risk assessment methodology [24]. We notice divergence between MHRI and NRI values, which reflect distinct methodological philosophies rather than deficiencies in either approach. The NRI's risk equation centers on Expected Annual Loss (EAL) calculations, where EAL is calculated as the product of Exposure, Annualized Frequency and Historic Loss Ratio, emphasizing monetary losses derived from historical disaster events (refer Fig. 9).

In contrast, our MHRI framework prioritizes forward-looking physical vulnerability indicators that may not yet manifest in historical loss databases. The importance of this approach is highlighted by the vulnerability profile of historically marginalized communities, where climate-driven hazards are projected to nearly double by the late 21st century [101]. Such shifts create disproportionate risk for the critical urban infrastructure, communities which may not have significant historical loss recorded but face extreme future susceptibility.

The framework incorporates 18 hazards ranging from coastal flooding to inland threats like tornadoes, drought, and wildfire, with

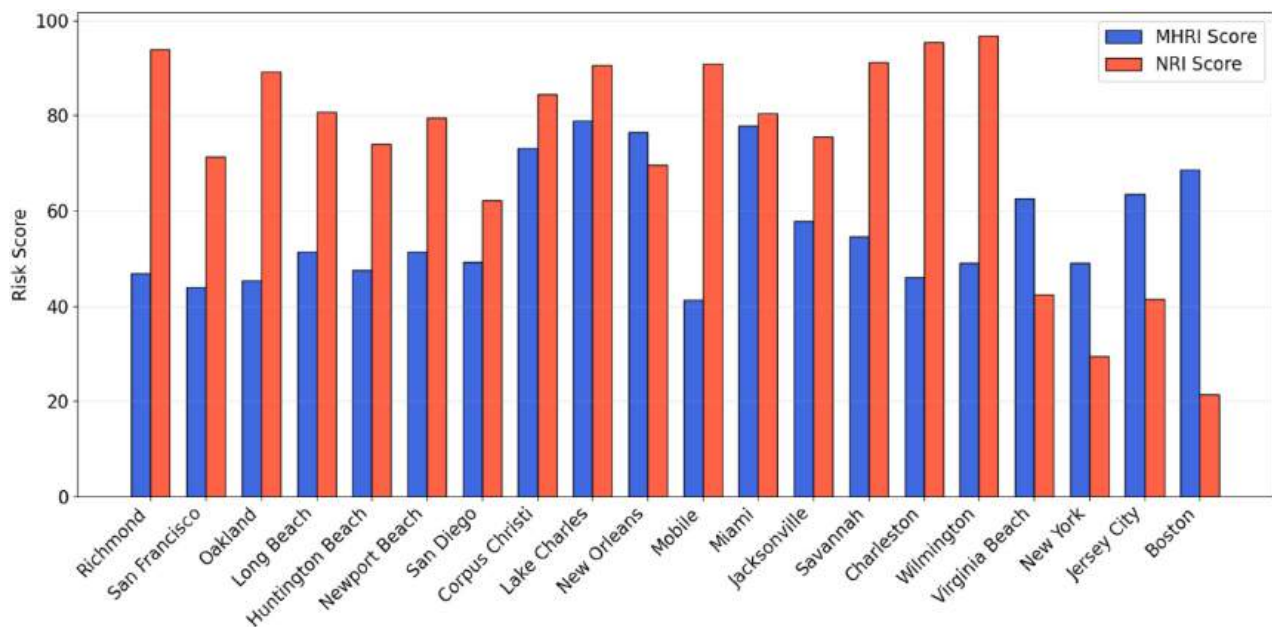


Fig. 9. Comparative analysis of Multi-Hazard Risk Index (MHRI) and National Risk Index (NRI) scores for 20 U.S. coastal cities. Blue bars represent MHRI scores developed in this study, while red bars indicate NRI scores from FEMA's National Risk Index. The variability between the scores is caused because MHRI emphasizes coastal-specific hazards and adaptive capacity, while NRI integrates historical loss data across all hazards. This divergence underscores the importance of specialized coastal risk assessment frameworks that capture marine-specific vulnerabilities not adequately represented in generalized all-hazards approaches like that of NRI.

equal methodological treatment but naturally varying weights based on local loss patterns. Since March 2023, NRI has utilized established Social Vulnerability Index incorporating 16 census variables across socioeconomic status, household characteristics, and housing/transportation themes, complemented by the University of South Carolina's Baseline Resilience Indicators for Communities (BRIC) framework with 49 resilience indicators across six capital domains.

In contrast, our MHRI framework—while comprehensive in addressing coastal dynamics, geomorphic processes (subsidence, erosion), and hydrometeorological extremes (precipitation, temperature, drought)—prioritizes forward-looking physical vulnerability indicators that may not yet manifest in historical loss databases [102]. Critically, cities experiencing accelerating threats like SLR and land subsidence may show limited historical losses but face extreme future risk that our framework captures through trend analysis.

Divergence becomes particularly evident in adaptive capacity assessment methodologies. The NRI incorporates sophisticated community resilience metrics through BRIC's 49 variables spanning social, economic, institutional, and environmental capital domains, alongside CDC SVI's socioeconomic indicators. However, our research reveals that even the NRI does not explicitly account for local cost of living variations or property value differences; it only captures housing cost burden relative to income. Our MHRI employs a streamlined approach using median family income, education levels, and economically active population as primary adaptive capacity indicators. We acknowledge this as a limitation, as true adaptive capacity depends on disposable income after accounting for local living costs rather than gross earnings alone. For instance, a city like San Francisco may show high median income in our framework but face constrained actual adaptive capacity due to extreme housing costs. Despite these limitations, our approach serves its intended purpose as a readily implementable, low-cost alternative that municipalities can deploy using publicly available datasets without the extensive data collection and processing infrastructure required for NRI's 49-variable BRIC assessment.

The 42.0 % normalized RMSE between frameworks underscores that this divergence is not a failure of either approach, but rather the multi-dimensional nature of coastal risk that benefits from multiple assessment perspectives. The NRI provides empirically grounded risk assessment based on demonstrated losses with comprehensive vulnerability metrics developed through extensive federal research investment. Our MHRI offers a complementary forward-looking tool emphasizing emerging coastal-specific threats, including detailed LECZ exposure analysis, high-tide flooding frequency, and infrastructure concentration in vulnerable zones—that can be rapidly deployed by resource-constrained municipalities. This methodological independence validates the necessity of multiple risk assessment tools, particularly for coastal cities where backward-looking loss data may poorly predict unprecedented climate-driven changes. Cities that have historically avoided major disasters through geographic fortune may nonetheless face extreme vulnerability to emerging threats not captured in loss databases, highlighting why prospective physical vulnerability assessment remains essential alongside historical loss-based approaches.

6. Conclusion

This study integrates diverse indicators of hazard, exposure, sensitivity, and adaptive capacity to provide a systematic framework for risk assessment in coastal cities. Analyzing twenty coastal cities across the U.S., we find substantial spatial variability in risk profiles, with scores ranging from 40.91 (Mobile, AL) to 78.05 (Lake Charles, LA). Gulf Coast cities exhibit the highest vulnerability due to extreme hazard exposure and limited adaptive capacity, while Pacific Coast cities demonstrate enhanced resilience through moderate hazard profiles and stronger socioeconomic resources. The severity of hazards varies spatially—Gulf Coast cities showed higher SLR trends, while northeastern Atlantic cities faced greater susceptibility due to infrastructure concentration in LECZ. The MHRI framework also identifies critical vulnerability hotspots where hazard exposure and socioeconomic challenges converge, creating compound risk profiles that traditional single-hazard approaches would underestimate.

We believe the MHRI can help city planners understand their city's relative risk position and identify which vulnerability components most significantly drive their city's risk profile. The reliability of this indicator-based approach is supported by the successful application of MCDM approach in the critical infrastructures to address management and operation gaps [103]. By prioritizing interventions based on technical performance and field-validated criteria, such framework offers a scientific basis for optimizing resilience strategies even when financial resources are limited. With projected increases in urbanization and environmental changes, this assessment enables coastal municipalities to prioritize targeted resilience investments based on their specific vulnerability drivers. Therefore, unlike traditional 'black box' national models, our framework functions as a 'glass box' tool that municipal planners can understand, modify, and validate using local knowledge which addresses the persistent science-policy gap that has currently limited the practical impact of sophisticated risk assessments [104]. The open-source, modular design bridges the gap between theoretical frameworks and practical planning applications, addressing a persistent implementation barrier in multi-hazard risk assessment.

CRedit authorship contribution statement

Subash Poudel: Writing – original draft, Visualization, Methodology, Formal analysis, Data curation, Conceptualization. **Sunil Bista:** Visualization, Methodology. **Saurav Bhattarai:** Visualization, Software, Data curation. **Sanjib Sharma:** Writing – review & editing, Supervision. **Rocky Talchabhadel:** Writing – review & editing, Supervision, Project administration, Funding acquisition, Conceptualization.

Code availability statement

The code is available on GitHub repo <https://www.github.com/subashpoudel19/multi-hazard>.

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Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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Appendix A. Supplementary data

Supplementary data to this article can be found online at <https://doi.org/10.1016/j.ijdr.2026.106023>.

Data availability

All data, models, or code that support the findings of this study are available from the corresponding author upon reasonable request.

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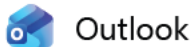
[EXTERNAL] Opposition to Monitor Point Rezoning

From sarah stansbury [REDACTED]**Date** Tue 5/19/2026 8:51 AM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Writing once again to voice my opposition to the Monitor Point upcoming. Since the inlet opened to the public recently many of our neighbors have seen just how negatively impactful these towers will be. The inlet is a really unique ecological treasure that acts as a safe haven for birds, turtles, horseshoe crabs, etc. The towers will loom over the space and change the character of what was promised to us so long ago. In 2005 Greenpoint was saddled with a massive rezoning. Currently that space is zoned R5 which, as I understand it, is a 5-6 story at tallest. While I'd rather the space just be park, this seems far more acceptable than what is currently being proposed and as a long time greenpoint resident I've had enough towers and construction and new, richer people in my neighborhood. These towers have provided far more luxury housing than affordable. My rent has only gone up more since they were built. Enough is enough. Greenpoint has taken on its fair share. We need schools, we need a better G train, we need a sewer system that can handle the tens of thousand of people that have been added to the neighborhood as well as the more frequent flooding as we are a waterfront community dealing with extreme climate change. The inlet, by the way, should it be made all park, will mitigate flooding. When they built the towers in LIC they added a huge salt water marsh to keep the luxury towers from flooding. Greenpoint should have been designed like that too. We need real solutions, not more luxury units and handouts to developers.

Thanks,
Sarah



[EXTERNAL] No to Monitor Point Without Conditions

From Sean C [REDACTED]

Date Thu 5/28/2026 10:47 AM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

Cc savetheinletbk@gmail.com <savetheinletbk@gmail.com>

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Good morning,

My name is Sean Cahill. I live in Greenpoint. I'm a small business owner and active community member, involved in artist curation at the McCarren Parkhouse stage, and a participant with the Brooklyn Community Kitchen at St. John's Lutheran Church.

Over the last six months, I have attended hearings to Monitor Point, listening carefully and observing both sides.

I'm here to clearly and unequivocally say no to Monitor Point without conditions. What is being proposed here is the wrong vision for Greenpoint.

Greenpoint historian Geoffrey Cobb wrote that after the 2005 rezoning, the question facing the neighborhood was whether it would preserve its working class waterfront character or become, quote, "Dubai on the East River."

Twenty years ago, the idea of buildings exceeding three or four stories on this waterfront was controversial. Now we are being asked to accept towers approaching 600 feet. It is absurd.

In 2005, Jane Jacobs, legendary urban scholar, warned mayor Bloomberg, quote, "successful city revitalization does not result from gigantic plans and show off projects. It builds up gradually and authentically from diverse human communities."

This waterfront carries real history. That history deserves to be honored in a way that is alive. Repurpose a ship. Create something with soul that families can experience together beside a beautiful park, not a massive museum in the belly of a sterile luxury tower.

What Monitor Point currently offers is not soul. It's a real estate project.

Luxury towers casting shadows over our streets and parks for generations will not honor the spirit of the community.

Councilmember Restler, I was relieved when you publicly said no to Monitor Point at a previous hearing, and I sincerely hope you still mean it, because once these towers are built, there's no undoing them.

Will we approve the transfer generational wealth from the community to Gotham?

No to Monitor Point without conditions. We deserve much better.

Thank you.

Best,

Sean Cahill
Paralegal | Prenuptial Agreement Specialist



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“Prompt, Professional and Thorough – As soon as I filled out the contact me sheet, a gentleman by the name Sean Cahill called me. He was very thorough. The attorney he linked me with was the same. We got it done in time for the wedding ...

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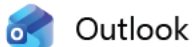


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[EXTERNAL] Opposition to Monitor Point Rezoning

From Sean C [REDACTED] >

Date Fri 5/22/2026 12:51 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Council Member Restler,

My name is Sean Cahill. I am a Greenpoint resident, a small business owner, a working musician, and an active member of this community, including with the Brooklyn Community Kitchen. I am writing to urge you to oppose the Monitor Point rezoning proposal.

I appreciated hearing that you stand in opposition to the project as currently proposed at the community meeting earlier this year. I hope you will continue to stand firmly against it as it moves before the City Council.

This proposal represents a major departure from the planning framework established during the 2005 Greenpoint-Williamsburg rezoning. At that time, Bushwick Inlet was envisioned as part of a sensitive transition between the neighborhood and the waterfront, anchored by mapped parkland and public open space. Monitor Point instead proposes towers reaching up to 600 feet tall directly adjacent to Bushwick Inlet Park.

As Jane Jacobs wrote in an April 15, 2005 letter to Mayor Bloomberg and the City Council during consideration of that rezoning, "successful city revitalization does not result from gigantic plans and show-off projects. It builds up gradually and authentically from diverse human communities." That warning feels especially relevant now.

I am also deeply concerned about the long-term precedent this sets. The proposal includes removing a park designation from adjacent land that had been mapped for park use as part of the Bushwick Inlet Park plan. After decades of advocacy to secure and complete that park, I feel this undermines long-standing public commitments and weakens trust in the planning process itself.

Bushwick Inlet is one of the few remaining inlet-edge open spaces on this section of the Brooklyn waterfront. It should remain a shared public resource—not a backdrop for luxury towers that will cast significant shadows over the surrounding neighborhood and place additional strain on an already vulnerable shoreline.

I respectfully urge you to oppose the Monitor Point rezoning and defend the long-term commitments

made to Greenpoint residents.

Thank you for your time and for your service to this community. I hope you stand in opposition to Gotham and advocate for the Greenpoint community. We need a park, not a luxury high-rise casting shadows across "garden spot of the world." - Pete mcguinness.

Best,

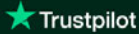
Sean Cahill
Paralegal | Prenuptial Agreement Specialist



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★★★★★ by Sarika

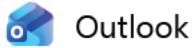
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[EXTERNAL] Opposition to Monitor Point Rezoning

From Shaun Dubreuil <[REDACTED]>
Date Tue 5/19/2026 9:04 AM
To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council Member Restler,

I'm writing as a longtime Greenpoint resident of 14 years, an active member of the neighborhood, and someone deeply involved in local stewardship efforts. I run both the 61 Franklin Street Community Garden and support the Greenpoint Hunger Program garden, and I care deeply about preserving the ecological health, livability, and character of our community.

I'm very concerned about the proposed Monitor Point development at 40 Quay Street.

Greenpoint and Williamsburg have already absorbed an enormous amount of new housing over the last decade, more than almost anywhere else in the city, while critical park infrastructure has lagged far behind. Our neighborhood remains severely underserved in open space, with only 0.6 acres per 1,000 residents, far below the city standard. Meanwhile, long promised public parks like Bushwick Inlet Park remain incomplete.

The developer's proposed "open space" is largely required waterfront access and hardscape, not meaningful green space that supports community health, recreation, biodiversity, or climate resilience. In practice, this project would bring thousands of additional residents into an area already overwhelmed by luxury development without delivering the level of true parkland and ecological investment the neighborhood desperately needs.

I'm also particularly alarmed by the ecological implications for Bushwick Inlet itself. The inlet is one of the few remaining natural embayments in New York Harbor and serves as an important habitat for migratory birds and marine life. Building massive towers directly adjacent to the water risks turning a rare ecological resource into little more than a backdrop for luxury real estate.

At a time when climate resilience should mean expanding green infrastructure and restoring waterfront ecology, this proposal appears to move in the opposite direction. Building dense luxury towers within a flood zone while reducing opportunities for meaningful parkland feels shortsighted and out of balance with the neighborhood's actual needs.

Greenpoint has contributed enormously to the city's housing growth already. What our community now urgently needs is investment in parks, ecology, public space, and infrastructure that improves

quality of life for existing residents.

I hope you will carefully consider these concerns as this proposal moves forward.

Thank you for your time and service to the community.

Best,
Shaun Dubreuil



[EXTERNAL] Opposition to Monitor Point Rezoning

From Stan Chaz [REDACTED]

Date Tue 5/26/2026 10:04 PM

To District33 <District33@council> [REDACTED]
[REDACTED]

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To the NYC City Council and City Councilman Lincoln Restler

The 40 QUAY “MONITOR POINT” Proposal is bad for the Bushwick Inlet estuary, bad for the adjoining Bushwick Inlet Park, and bad for the residents of the Greenpoint / Williamsburg community. Please vote NO on this proposal.

40 QUAY is a shameful giveaway of public MTA land to private developers that deprives future generations of our North Brooklyn community of the parkland that is so sorely need. Once lost this precious & unique piece of waterfront will be lost forever. Please save it. Please vote "NO" on thy Monitot Point proposal. Vote "NO" on any rezoning other than sprely needed parkland.

This land, just 50 feet from the shoreline of Bushwick Inlet, is one of the East River's only natural tidal estuaries. It belongs to the public and must serve the public good, not private luxury development & the sham of unaffordable "affordable" housing in the worst possible locations for our community.

As noted in detail below, the facts clearly speak for themselves. Please hear & heed those facts, as well as the voice of more than FIVE THOUSAND SIX HUNDRED members (and voters) of our community, who have signed a petition demanding a "NO" vote on the Monitor Point Proposal. Please respect their voice and vote NO on this misguided proposal.

Open Space

Developer Claim

The developer's plan will create 50,000 square feet of new open space.

Fact

These items, an upland connector and a waterfront public access area, are zoning requirements per the local Waterfront Access Plan, not sweeteners that the developer is adding in.

They essentially are a street extension and a esplanade comprised mostly of hardscape, not actual parkland with athletic fields & courts, play areas, lawns and gardens.

Per the City's environmental review standards (CEQR), neighborhoods should have 2.5 acres of open space per 1,000 people. The city average is 1.8 acres, and Greenpoint Williamsburg is a miserable 0.6 acres. Using this metric, the developer should be creating 300,000 square feet of new open space to accommodate the almost 3,000 new residents their proposed buildings will bring in.

Affordable Housing

Developer Claim

The developer's plan will include 25% affordable housing units in their buildings.

Fact

This item is the minimum quantity required by the City's zoning resolution. It's not being included voluntarily.

New building on PUBLIC LAND should be 100% affordable, not simply 25%.

Because so much luxury housing stock is being added (862 units planned from Monitor Point) to the local and citywide housing supply, Average Median Income, which determines affordable housing rental rates, has been steadily rising.

79 Quay Street across from 40 Quay, is listing an apartment for \$13,500/month. This market speculation is trending way up on the North Brooklyn waterfront.

Ultra-luxury housing, that Monitor Point plans to develop, will worsen the housing crisis for 90% of the population who cannot even come close to affording rent at that level.

Thus us NOT a NIMBY issue : **GREENPOINT-WILLIAMSBURG (BK01) ALREADY HAS HAD THE MOST NEW HOUSING UNITS IN NEW YORK CITY OVER THE LAST DECADE.**

“Some neighborhoods got away with contributing no new affordable housing,” said (Brooklyn Borough President) Reynoso. “Between 2010 and 2020, Community Board 1 — which encompasses Greenpoint and Williamsburg — added 18,500 units of a housing, while Community District 18 — which encompasses Canarsie, Bergen Beach, Mill Basin, Flatlands, Marine Park, Georgetown, and Mill Island — only added 500 units.”

Parks and Housing

Developer Claim

New York City and Brooklyn are facing an unprecedented housing crisis that requires creative solutions like Monitor Point.

Fact

Over 29,000 new units built in our district, the most of any neighborhood in NYC for the last 14 years. (see text and charts below)

Both City Hall and the Brooklyn Borough President have stated that robust housing development must happen in underperforming home construction districts and outside overwhelmed districts such as ours.

We have delivered enough housing and have been shortchanged on parks, which is critical infrastructure in itself serving the health and well being of New Yorkers and providing climate resiliency.

In North Brooklyn promised Bushwick Inlet and Box Street Parks have not been delivered after 20 years and counting, 22 acres worth.

Neighborhood Character

Developer Claim

Monitor Point was specifically designed to respect Greenpoint's unique character.

Fact

Greenpoint's charm lies in the abundance of low rise historic brick and limestone rowhouses constructed in the latter half of the 19th century, along with converted warehouses and light manufacturing buildings from the same era.

Monitor Point's building plan will result in almost 1.2 million square feet of steel, concrete and glass, towering well above the existing towers on the Greenpoint waterfront. This design will double down on the assault on the unique village character of Greenpoint, anything but respectful.

The current low density zoning from 2005 for the site (R6) was meant to protect the park and residential blocks nearby. Along the western waterfront on West Street high density (R8) was assigned to those properties and R6 was designated along the street containing building height limits, to provide a sensitive transition across West Street and Quay Street, which promotes good urban design.

Removal of Parkland

Developer Claim

Monitor Point will preserve local heritage through the Greenpoint Monitor Museum.

Fact

To pay for the museum the developer is planning to have the park designation from the adjoining property at 56 Quay Street removed to enable them to acquire air rights for use at 40 Quay Street. This site was originally planned to be a part of Bushwick Inlet Park.

This action and purchase will result in over 300,000 square feet of additional development rights for the Monitor Point building complex, creating tremendously out of scale towers and luxury apartments mostly for the wealthiest 10% of the population.

Effect on Ecology

Fact

Monitor Point threatens a rare ecological treasure—Bushwick Inlet is a vital natural habitat in NYC's harbor and home to diverse wildlife.

Bushwick Inlet is a rare natural embayment, a migratory bird stop, and an ecological treasure opening to the public for the first time in over 100 years.

So close to the water's edge, the towers pose a direct threat to wildlife and the natural sanctuary of the Inlet, reducing it to a mere water feature amenity within the huge development. More than 80% of our marine life health depend on estuaries like the Bushwick Inlet.

Built within a 100-year flood zone, a massive skyscraper will work against nature-based flood defenses that would best protect the neighborhood.

Flood Risk

Developer Claim

Coastal resilience is central to their design.

Fact

Being that the 40 Quay Street property is adjacent to Bushwick Inlet, it resides squarely inside 100-year and 500-year flood zones. Storm surges and flooding from increasingly severe storm events put potential residents who may live on this property in the middle of harm's way and an evacuation zone. (see map screen below)

Monitor Point is required to elevate the 40 Quay Street property up to federal and city levels. Still, the probability that this site will flood during extreme rain events is high. Knowingly locating thousands of residents there seems reckless.

Additionally, relocating existing MTA infrastructure from 2 sections of a coastal flood zone to another one near sewage-inundated and superfund-designated Newtown Creek, also seems reckless and defies common sense.

Neighborhood Improvement

Developer Claim

The plan with support a fairer, more affordable Greenpoint.

Fact

A plan for building a horribly oversized complex creating the tallest towers and apartments for the

wealthiest minority in a neighborhood already overwhelmed by towers and tens of thousands of new apartments mostly for that minority, which will degrade the character of our neighborhood further, will create anything but a fairer Greenpoint.

Transparency

Missing From the Developer

Full detailed renderings of the planned Monitor Point buildings are conspicuously absent from presentations and the project website.

Fact

To have a honest good faith discussion about the plan, the community should have access to complete visualizations of the towers.

This is the elephant in the room that must be discussed in conjunction with everything else. The size and scale of the project is critical to the conversation. Let us see it fully and talk about it.

To be fair is to be fully transparent with the development plans.

In conclusion, I urge the City Council to vote "NO" on the 40 QUAY "MONITOR POINT" Proposal. This site needs to be preserves as one of the last crucial &ubique plots of waterfront land in out community. It needs tobe preserved as parklard, not a give away of public MTA land to orivate deveopers while depriving future generations of ourcommunity of the parkland that they so sorely need. Once lost, it will be lost forever.....

Stan Chadziutko





[EXTERNAL] Monitor Point Rezoning Testimony - LU 0067-2026 thru LU 0071-2026

From Steve Chesler [REDACTED]

Date Fri 5/29/2026 2:59 PM

To Land Use Testimony <landusetestimony@council.nyc.gov>; District33 <District33@council.nyc.gov>; Speaker Menin <SpeakerMenin@council.nyc.gov>

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Ms. Farrah Louis
Chair, NYC Council Subcommittee on Zoning and Franchises

Mr. Lincoln Restler
NYC Council Member, District #33

Ms. Julie Menin
Speaker, NYC Council

Re: Monitor Point Rezoning Testimony - LU 0067-2026 thru LU 0071-2026

Dear Chair Louis, Council Member Restler, Speaker Menin,

I urge the subcommittee and full council to recommend No with strict conditions for the Monitor Point Rezoning application, for a site located at 40 Quay Street in the Greenpoint section of Brooklyn.

My name is Steve Chesler. I am a 24-year Greenpoint resident who lives 10 minutes from Bushwick Inlet Park and the 40 Quay site. I am Vice-president of the Friends of Bushwick Inlet Park and a member of Community Board #1. But, today I write to you as an individual who is a staunch Bushwick Inlet Park advocate and a neighborhood preservationist, and now working to Save the Inlet.

Housing is an essential need along with food, water and clothing. Pursuit of increasing the City's housing stock to help mitigate the housing and affordability crisis is a very noble and just cause. However, in the zeal to support this mitigation with an emerging so-called opportunity, like the one being presented at 40 Quay Street in Greenpoint, we must not turn a blind eye to a given project proposal's potential negative effect on local infrastructure. What is the point of having an affordable home if travelling to and from work becomes a huge burden, our public open spaces are overwhelmed and one's home incurring an increased risk of having to evacuate during a tropical cyclone, that in the future is predicted to flood waterfront zone areas more than Hurricane Sandy did, triggering an evacuation necessity?

Borough and City-wide Urban Planning

The last two versions of the Comprehensive Plan for Brooklyn cites the need for community districts that have developed almost no new housing in more than a decade versus Community District #1 (where Monitor Point is proposed) that has created the most new housing not only in Brooklyn, but the entire City. Mayor Eric Adams noted this disparity while urging most other districts to develop more housing. [More than 29,000 units](#) have been created from 2010-2024. And, over 3,000 new units in progress or planned just north of 40 Quay Street along West Street in Greenpoint. 20% of these units will be incentivized to be affordable to sync with almost all of the large tower developments along this corridor that have included income-restricted units.

Transportation

This local housing saturation, compounded with the estimated additional 3,000 residents that Monitor Point would bring into Greenpoint, will pile onto a devastating subway capacity problem for the G and L lines that is predicted with the onset of massive developments from the OneLIC in Queens, [River Ring](#) (page 12-24) and Domino Projects in North Brooklyn. The OneLIC [EIS chapter](#) (page 23-9) on Unavoidable Adverse Impacts estimates without the MTA adding 2 additional G trains during morning and evening rush hour, subway cars, platforms and entrances will exceed full capacity. The G train is the main public transit conduit through Greenpoint and Williamsburg. To the south it connects with the crosstown L train that moves commuters to and from Mahanattan and Brooklyn east. The chapter on Transportation from the River Ring large scale housing development estimates after the completion of this project, the Bedford Avenue station will push subway car haul beyond maximum capacity which will be compounded by the completion of the Domino housing development (over 2x the size of River Ring). All 3 projects along with Monitor Point and the future West Street developments will greatly worsen this problem on both subway lines.

Intersections in Greenpoint near the proposed Monitor Point project will incur unavoidable adverse impacts per the chapter of the same name in this [project's DEIS](#) (page 1&2). The Greenpoint Avenue intersections at Franklin and McGuinness Boulevard will experience vehicular traffic beyond acceptable and safe standards. Since the redesign of McGuinness Boulevard with its reduction of traffic lanes on both sides of the roadway, side streets are experiencing a major increase in car volume. Monitor Point will exacerbate this problem. Two corners at the intersection of Quay Street and Franklin Street will be pushed beyond capacity by the proposed project. The transportation chapter failed to mention that the Franklin St/Kent Ave bike lane is the 5th busiest in the City, which traverses directly in front of the 40 Quay Street site, potentially causing an existential safety threat to cyclists.

Urban Design/Neighborhood Character

Per the summary from the 2005 Greenpoint-Williamsburg Waterfront Rezoning (see attached), the R6 zoning was created to foster a smooth and sensitive transition from high density development along the East River waterfront to the lower density development on the east side of West Street and Bushwick Inlet Park to the south. This plan was methodically plotted out. It was concession to the local community whose community board posed a condition that public open space be created beyond Bushwick Inlet north to Oak Street, which included the 40 Quay property.

The City Council approved this rezoning with only the 27-acre Bushwick Inlet Park included as open space mitigation against the tsunami of housing development created in the 20 years since the resolution's passage. However, tragically only 8 of those acres are open to the public or soon to. The timeline for remaining sections is undetermined with complex remediation and budget challenges.

Therefore, the developing three large-scale towers, one which will be the tallest in Greenpoint and in Williamsburg north of N 3rd Street, adjacent to Bushwick Inlet Park will have a devastating effect on the park and the adjacent neighborhood. It will destroy the neighborhood character of the nearby low density Greenpoint Historic District. Being so incredibly large and close to the park it will impose itself in a degrading way, effectively privatizing the park as the front yard for elite residents who will be paying upwards of \$20,000/month for rent. The idea of the parks being the great equalizer will be destroyed.

With sought-after waivers to eliminate building setbacks for this out-of-scale towers will increase shadow imposition along Quay, West and Franklin Streets for hours, especially after the Wharf West towers across Quay Street to the north are built. Gotham's touted upland connector spanning from Quay Street to the park will be a cavernous dark tunnel traversing between the 21-story and 41-story towers. This will be a terrible experience for people on the street.

Gotham Organization is hyper-aware of this problem as demonstrated by the fact that they refused to present full detailed renderings to the Community Board (even after a specific request to do so from its Land Use Chair and at the Borough President's public hearing on this application on March 11th. This should be potentially disqualifying.

Open Space

The open space ration for this district is .6 acres per 1,000 people, one of the City's worst, well below the City's average of 1.8 acres and the CEQR stated goal of 2.5 acres. A completed Bushwick Inlet Park will not remedy this problem with the massive quantity of housing development in the district, especially along the western and northern waterfront. A built-out Monitor Point project will worsen this problem, especially in the study area, by almost a 20% reduction in open space eliminating the unusable watery sections of Bushwick Inlet Park's zoning lots (almost 10 acres overstated). This is and will be an unhealthy situation affecting the well being of district residents and workers.

Environment/Climate

The 40 Quay site will flood during future hurricane events from storm surges. It was inundated during Hurricane Sandy. With increasing sea levels, up from 1 foot more to 23" inches recently, storm surges and flooding will worsen. Residents will have to evacuate. Market rate residents will most likely have the luxury of additional homes out of the city to take refuge in. However, lower income residents will most likely *not* have this luxury and have to remain in harm's way. Knowingly and willingly locating a large-scale housing development on this site defies logic and common sense.

There are viable and superior alternatives to constructing the tallest residential buildings in Greenpoint abutting Bushwick Inlet and its namesake park that would overwhelm the park and the neighborhood and its infrastructure:

- A. At the very least there could be no action. A low-rise brick building framing the park would be very much a part of the historic architectural landscape of Greenpoint.

B. Also, building as-of-right at 40 Quay would be more reasonable, with adherence to the original thoughtful, lower density zoning designated for this site in 2005.

C. But, the best alternative would be for the MTA to dispose (legal and offered per the NYS Public Authorities Law) the 40 Quay property to a state or city agency for the purpose of transforming this site into resilient public open space that would expand Bushwick Inlet Park per the [Community Board's recommended condition](#) (page 8) in their response to the 2005 Waterfront Rezoning, rebalancing open space infrastructure to meet the incredible influx of new local residents while also mitigating future storm surges in a more meaningful way.

And, the good news along with this is the incredible amount of mixed-income housing units this district has created (for the last 15 years, #1 in the most in NYC), with thousands of mixed-income housing units in the pipeline on nearby West Street alone.

This rezoning is unnecessary. Public land for public use is the just alternative to the plan for an oppressive private for-profit development, on public land.

Therefore I urge a vote of NO by the subcommittee and the full council.

Conditions:

1. A capital payment of \$25,000,000 from Gotham Organization to New York City towards the development of Bushwick Inlet Park (remediation especially)
2. AND all conditions put forth by Brooklyn Community Board #1 in its recommendation.
3. With regard to the G subway line train improvements condition:
 - a. It must go further by demanding the MTA add 2 full length trains during AM and PM rush hours. Communications Based Train Control will not be enough to overcome the increase in ridership estimated by the EIS's noted above, especially that of the OneLIC project.

Omissions and misstatement from the May 29th public hearing by Gotham Organization:

- Gotham Org refused to present full detailed renderings of their buildings (as they have through all previous phases of this ULURP process) including closeups of vantage points from inside the park on the street from Quay, Franklin and West Street, which is the core aspect of their rezoning ask. Instead, they provided plenty of pretty pictures of the WPAA and the upland connector.
- Gotham Org will *not* be funding the additional 15% for affordable housing units that they are committing to include in the project. These additional units, *(if approved- and they have not yet been approved by HPD nor been budgeted, per HPD to CB1)*, will be funded by the taxpayers through HPD.
- Gotham and the MTA, when providing the estimated revenue the MTA would gain over 100 years, did not account for the rent the MTA will be paying for at their new facility in East Williamsburg. The net revenue amount will be about $\frac{1}{3}$ less over 100 years.

Sincerely,

Steve Chesler



[Hurricane Sandy Flood Map](#) (search for 40 Quay Street)

Steve Chesler



[EXTERNAL] Opposition to Monitor Point Rezoning

From salbpop@gmail.com [REDACTED]

Date Tue 5/26/2026 4:26 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Lincoln -

I wrote to you several months ago regarding this issue, and it now comes before you—as our representative on the City Council—for a decisive vote that will shape our community for generations. You know better than anyone, the history of our neighborhood and the compromises we made to allow for its significant redevelopment over the past 20 years. What we do not need are more oversized, market-rate towers. What we need is the park.

As you are aware, the proposed rezoning violates the 2005 zoning agreement, which clearly envisioned this site as a buffer and transition zone—not a location for high-rise towers. Our district already has one of the lowest ratios of open space per resident in New York City. Anyone visiting McCarren Park on a mild day sees the reality: thousands of people crowded into limited green space. Preserving natural space here is not a luxury—it is a necessity.

If this development moves forward, we will permanently lose an irreplaceable natural habitat, with no path to reclaim it in the future.

Some may argue that the inclusion of affordable housing justifies this project. But if that is truly the priority, the development should be 100% affordable—not a predominantly luxury tower with only a fraction of affordable units.

North Brooklyn does not need more luxury towers. Time and again, such developments have accelerated displacement, driven up rents, and failed to make communities like ours more affordable. This project would add 1,200 predominantly luxury units to an already overbuilt neighborhood, without the infrastructure improvements needed to support that density.

The sale of this MTA parcel is troubling in itself, given longstanding concerns about the agency's lack of transparency. We should not compound that concern by approving a rezoning that would permit a 60-story building so dramatically out of scale with the surrounding community.

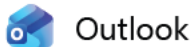
Monitor Point is not like other rezoning proposals. It is a **unique site, a neighborhood treasure**, and one of the last opportunities to meaningfully expand public open space along the waterfront.

For all of these reasons, I respectfully urge you once again to vote no on this rezoning and help preserve this vital natural area for current and future generations.

We're counting on you.

Respectfully yours,

Susan Albrecht



[EXTERNAL] Please Protect the Bushwick Inlet

From Teresa Lu [REDACTED]

Date Sat 5/23/2026 12:23 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council Members,

My name is Teresa Lu, and I've lived in East Williamsburg for over 10 years (city council district 34), and in NYC for 17 years. My address is 246 Withers Street, Apt 3d, Brooklyn.

I'm writing to express my concerns about the proposals for the Bushwick Inlet.

Firstly, thank you for your work and attention to this issue. I visit the waterfront every week; it is very important to my connection to the city and the community. Like a lot of my neighbors, I strongly feel that public spaces are crucial to all of us; they keep us connected and healthy, and they represent the culture of the city. I'm sure you'll agree that they need to be protected, not replaced.

Also like my neighbors, I strongly believe that affordable housing for all New Yorkers should be a top priority. However, I'm very concerned that the proposal to upzone the Bushwick Inlet area to build luxury apartments will in fact make our community even less affordable. The issue is *not* that there aren't enough existing homes. That much is clear to us. There is plenty of housing in Greenpoint and Williamsburg (and more planned) that could be made accessible to people that are currently not. We do not need to build more market-rate apartments on public land that is important to our community and local natural ecosystem.

The Monitor Point proposal is now saying that 40% of the units built would be affordable housing. I think a condition of 100% affordable housing *may* lead to a less detrimental outcome, but I still don't feel that this is the best decision to be made for this precious land.

I understand that you will be reviewing the rezoning application. I hope that you make your decision based on your knowledge and the best interests of the home we share, rather than false promises of the developers who are trying to strike the best bargain to make a profit.

Thank you again for all of your work!

Sincerely,
Teresa

--

Teresa Lu



Tony Olszewski
City Council Written Testimony (May 27, 2026)
In SUPPORT of MONITOR POINT

Dear City Council,

My name is Tony Olszewski, and I'm a lifelong Greenpointer: I raised my three children here, and now, my three grandchildren are growing up in the neighborhood and attending local schools. I am writing to express my strong support for the Monitor Point proposal.

I support this project because it is a win for our community.

Monitor Point is a win because it will finally create a home for the Greenpoint Monitor Museum. I've been involved with the Museum since the beginning and I've seen the impact that its road shows and other events have on students. The Museum's road show program gives students an opportunity to create models, compose reports about the Civil War, and receive recognition for their work at an annual awards ceremony, all while immersing themselves in a key part of Greenpoint's history. The people of Greenpoint deserve to have a place that showcases this part of our shared past, where families can have a hands-on experience that celebrates Greenpoint's contributions to saving the Union. The Museum will also be a local attraction that helps bring new visitors to our community, which means new customers at our local businesses. Monitor Point presents a transformative opportunity for the Museum, its land, and its finances. We don't want this opportunity to pass us by.

Monitor Point is a win because it will provide new housing for families in the area. This project will create over 1,100 new units, including 460 permanently affordable homes. We need this housing. People who today aren't sure if they'll be able to stay in Greenpoint or New York City will be given hundreds of new options of places to live. When we welcome new families to our communities at Monitor Point, those new families will bring increased school enrollment, which will mean additional funding for our schools.

Monitor Point is a win for our community because it's a win for our waterfront. The Monitor Point project will create over 50,000 square feet of public open space where none currently exists. On the Museum's land, there will be a one-of-a-kind space for school and community events at the spot where the USS Monitor first entered the water. This open space will help integrate the Museum into the waterfront, inviting the public into the story of the Monitor. Our community will not only get Bushwick Inlet Park, but also the Museum's

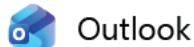
Tony Olszewski
City Council Written Testimony (May 27, 2026)
In SUPPORT of MONITOR POINT

waterfront space, where the Museum will get to share its unique historical perspective, and which will connect Bushwick Inlet Park to the Greenpoint waterfront to the north.

Greenpoint will not be losing anything from this project. We only stand to gain – a Museum, more housing, and unique public open space. I respectfully ask the Council to vote in favor of this proposal.

Thank you,

Tony Olszewski



[EXTERNAL] Opposition to Monitor Point Rezoning [LU 0071-2026]

From Trina McKeever [REDACTED]

Date Thu 5/28/2026 1:08 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Land Use Committee Chair Riley and Zoning and Franchise Subcommittee Chair Louis,
Dear Committee and Subcommittee members,
Dear Councilman Restler,

Monitor Point raises so many concerns: a rezoning of a rezoning in which the developer is asking for a building 4x the current R6 zoning on unstable, contaminated landfill, the intention to build the 3rd highest building in Brooklyn on the edge of a public park with no setback, 1,150 more housing units in overburdened Brooklyn CB1 in a red-hot FEMA flood zone. I am, however, writing to you about the Greenpoint Monitor Museum the pivotal piece that makes the development possible. I bring to this comment my 35 years of working in the art world, and 20+ years of activism for my home community of Greenpoint.

Repeatedly in public ULURP hearings before Brooklyn CB1, the Brooklyn Borough President, the CPC hearing and yesterday at the Council Hearing, Gotham Organization's President of Development, Brian Kelly boasted that Gotham's philanthropic collaboration with the Greenpoint Monitor is in keeping with previous successful relationships between the developer and local non-profits. He cited creating a home for the Chinese American Planning Council (\$69.9m revenue, \$160m assets per 2024 990 filing) at 45 Suffolk Street | [The Suffolk, Lower East Side, New York | Gotham Organization](#) and providing administrative offices for Covenant House (\$93.9m revenue, \$160m assets per 2024 990) at [550 Tenth Avenue, Hudson Yards, New York | Gotham Organization](#) Comparing CPC and Covenant House to the Greenpoint Monitor Museum is a false equivalency.

The Greenpoint Monitor Museum was established in 1996 to commemorate the USS Monitor warship built in Greenpoint in 1862. Today the museum collection exists in a closet of a public middle school in Greenpoint from which the two Museum Board members launch intermittent classroom visits to teach young students about the history of the USS Monitor. Greenpoint Monitor Museum's most recent tax filings from 2023 reveal that it has no paid staff, only \$14,407 of cash on hand, a debt of \$318,869 in the form of accumulated loans from the museum's president and no meaningful income. At the March 18 hearing before the Planning Commission, the museum's president was unable to identify any meaningful programming or partnership plans should the museum be constructed. The museum's only public presence is a website [The Greenpoint Monitor Museum](#) that has not been updated since January 2012.

The idea of commemorating this aspect of Union history is important, and it has already been done. The federally-recognized USS Monitor Center is located within the Mariner's Museum and Park in Newport News, Virginia and contains over 200 tons of artifacts recovered from the USS Monitor including its

revolving gun turret, steam engine and more as well as a Conservation Complex dedicated to ensuring the preservation of the artifacts. See [USS Monitor Center - The Mariners' Museum and Park](#)

While lacking funds, staffing, a collection and programming, the Greenpoint Monitor Museum does own an acre + of donated land, 56 Quay Street which has sat vacant since 2003 when the former owner, Motiva Enterprises deeded the property to the Greenpoint Monitor Museum as a site for commemoration of the USS Monitor and the neighborhood's industrial history and efforts to improve the local environment. Motiva's gift imposed significant deed restrictions on the Museum's use and on any resale of the land by the Museum, basically, that upon dissolution, the land could only be transferred to a not-for-profit or governmental organization having the purpose to benefit the public. In keeping with the deed restrictions, the land (directly adjacent to the MTA lot at 40 Quay) was mapped parkland in the 2005 Greenpoint Williamsburg Waterfront rezoning, with the expectation that the land could be incorporated into the planned park and also contain a site for the Monitor Museum's educational purposes

In 2015 the Greenpoint Monitor Museum sought and received a \$600k grant from the Greenpoint Community Environmental Fund (GCEF) to "develop an ecological design for a green living shoreline restoration and stabilization at the proposed site of the Greenpoint Monitor Museum building and incorporate that environmental design process into educational programs conducted at Greenpoint schools by the Museum." While the grant was limited to planning and permitting, Greenpoint Monitor Museum, working with the engineering firm AECOM devised a natural shoreline stabilization plan with built in flood control measures that tied into elevations of adjacent properties. [Greenpoint-Monitor-Museum-USS-Monitor-Park-Design-Plan.pdf](#) The plan was presented to DCP and NYC Parks as well as to the Greenpoint community in 2017 and in February 2019, AECOM on behalf of the GMM submitted permit applications to the NYC and NYS regulatory agencies for implementation.

Enter Gotham in 2021 and the plan to "collaborate" with the nonprofit Greenpoint Monitor Museum. The plan is to massively upzone the Museum's land to R8, both creating and transferring 340,000 square feet of new development rights from the rezoned lot to the largely luxury housing Monitor Point Development. With it, the proposal calls for, an abandonment of the environmentally sensitive shoreline plan for the construction of a 40' high and 787' long bulkhead along the shoreline to better protect the Monitor Point Development and the build out of remaining Museum land needed to fulfill development's open space requirements in exchange for a Gotham's contingent agreement to build a 34,000 sf Greenpoint Monitor Museum, Gotham would build only if the Museum can afford to build and maintain it as a going concern

Even a small museum requires capital reserves and a capacity to produce income for staffing, for programming, to build a collection, for repairs and maintenance, for conservation, for accounting, for advertising, for insurance etc. It is disingenuous to believe that the Greenpoint Monitor Museum even if it were to expand its mission beyond its narrow focus has the capacity to succeed. And then what happens?

I urge City Council to see Gotham's opportunistic embrace of the Greenpoint Monitor Museum for what it is, to acknowledge that the project rests on this lot of land and for this reason (and so many additional reasons) to vote no on the Monitor Point Project rezoning.

ULURP approvals especially on Public Land deserve better scrutiny.

Sincerely,

Trina McKeever

[REDACTED]
Brooklyn NY 11222



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Victoria Rich [REDACTED]**Date** Sat 5/23/2026 12:22 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Dear Council Member Restler,

I am writing in opposition to the Monitor Point Rezoning.

It is redundant to restate the reasons why this development is not beneficial to the Greenpoint community. More giant luxury towers are not the solution to the affordable housing crisis. The developers and the wealthy residents will be the only ones to benefit.

Please do what you can to help our community.

Thank you,
Victoria Rich



Outlook

[EXTERNAL] Opposition to Monitor Point Rezoning

From Wendi C (innerstellarmedium) [REDACTED]**Date** Wed 5/27/2026 4:19 PM**To** District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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We need more nature and 100% affordable housing. This is a rare nature habitat in our concrete jungle where migratory birds flock and can be enjoyed for generations to come. We don't need a museum we need maximum public green space to be human within. What is the point of living in a luxury area when there is no greenery left to enjoy. The concessions to big real estate are too much. This parkland was supposed to be public. I am sure the developer is designing on such a way where buildings predominate and not a comfortable space for all. Please preserve what nature we have left.

- Wendi Carlock

Sent from my iPhone



[EXTERNAL] Support for DeWitt Clinton Park North and Monitor Point

From William Meehan [REDACTED]
Date Tue 5/26/2026 8:53 AM
To Land Use Testimony <landusetestimony@council.nyc.gov>

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To the Land Use Committee:

I am writing as a NYC resident asking for you to please approve all of the rezonings on the agenda for May 27: DeWitt Clinton Park North (801 Eleventh Ave and 629 West 54th St) and Monitor Point. I think they would both be welcome additions to their respective neighborhoods.

The rezonings north DeWitt Clinton Park would both help bring housing to a neighborhood that desperately needs new housing options. Hell's Kitchen severely lacks new housing thanks to the Special Clinton District. I think it's important that we maximize the potential of formerly industrial land when it is so close to Midtown jobs.

I lived in North Williamsburg in 2020 and 2021, so I became very familiar with the waterfront during my many pandemic walks. I think that Monitor Point would be a great improvement to the waterfront. I appreciate that it would replace the physically imposing bus depot with mixed-income housing and connect the waterfront to the newly opened segment of Bushwick Inlet Park. I ask that you not try to increase the percentage of income-restricted units to a point that would make the project financially infeasible, because I think it's very important that it gets built.

Thank you,
William Meehan



[EXTERNAL] Opposition to Monitor Point Rezoning

From Zoe Raphael [REDACTED]

Date Thu 5/21/2026 12:59 PM

To District33 <District33@council.nyc.gov>; Land Use Testimony <landusetestimony@council.nyc.gov>

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Hello,

I'm Zoë. I live on West Street in Greenpoint, I am a member of the community garden at 61 Franklin St, and I can see Bushwick Inlet from my apartment. The proposed project, Monitor Point, is egregious. Its height will cast shadows all over Greenpoint, putting our community garden at MAJOR RISK of losing all of its sunlight. Greenpoint and North Brooklyn are already starved for community gardens and green space, and the space we need sits right there behind a fence waiting for the city to open it. This construction project would not only make living here incredibly uncomfortable but would also seriously impede the Inlet's new public space. The photos I saw show them building quite literally INTO the inlet, completely disturbing the natural life there and delaying (again) the completion of a park that North Brooklyn has awaited for 20 years. Not to mention it messes with the system and will cause more flooding. The people deserve a fast track to open the park, not another ten-year delay plus pollution. It is a complete slap in the face to everyone who's been fighting for this green space for 20 years. With 67 West and 90 West now sold, the whole waterfront will become unrecognizable if we don't act. Many small businesses are being pushed out, and the little architectural detail and history we have are in jeopardy of being washed away by people who do not care about this neighborhood or its residents. They claim we need more housing, but this project will only serve to raise rent prices for everyone, especially since prices have already increased exponentially. This would make living on the waterfront miserable for the next 10 years while they pollute our air and disturb us with noise and construction hazards. Their claim that the MTA will make money means nothing because Greenpoint won't benefit from it at all. I thought the MTA had already upgraded our G train stations? If the MTA really cared about working with the Monitor Museum, they'd simply rent the already standing building to them (and the rest of the community!) so they could build their museum there. As more towers are built, residents will have less green space. Let us have the inlet. Do not allow anyone to build multiple buildings under the guise of "more housing", it's simply ridiculous. They should build their complex somewhere that won't disturb the natural wildlife habitat, and also won't put our community in danger of flooding and cancer-causing pollution.

Signed, a resident who wants the best for everyone.

Thank you,

Zoë Raphael