



River North (Liberty Towers) FEIS
DEIS Comments Received

20 Silver Lake Road
Staten Island, New York 10301-3013
June 23, 2021

Olga Abinader, Director
Environmental Assessment and Review Division
New York City Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271

River North (formerly Liberty Towers) DEIS
Project Identification
CEQR No. 20DCP140R
ULURP Nos. 210289 ZMR, N210290 ZRR, 210291 ZSR
SEQRA Classification: Unlisted

Re: NYC Department of City Planning “Notice of Completion of the Draft Environmental Impact Statement”, May 3, 2021.

Dear Director Abinader,

Taking at face value the NYC DCP’s statement in the referenced notice that, “Written comments on the DEIS are requested and would be received and considered by the Lead Agency,” I respectfully submit the attached comments to the *River North* (formerly *Liberty Towers*) Draft Environmental Impact Statement.

The DCP letter states, “The lead agency has conducted a coordinated environmental review of the Proposed Actions including, DCP, the NYC Department of Transportation (NYCDOT), the New York City Department of Parks and Recreation (NYC Parks), the NYC Department of Environmental Protection (DEP), the NYC Landmarks Preservation Commission (LPC) and other interested agencies.”

Having read this, I understand that you may be able to already answer some of the concerns that I raise in my comments to the *River North* Draft Environmental Impact Statement.

One comment on the above referenced notice: the height of the buildings and the number of parking spaces differs from the DEIS figures.

Thank you for your work on behalf of all of the stakeholders in this review process,

Sincerely,

Helen Northmore

HN:hn

Enclosure: Comments on *River North* Draft Environmental Impact Statement
copy to: Marisa Lago, Chair, City Planning Commission, Certified Mail, Return Receipt.
James Oddo, Staten Island Borough President
John Carroll, District Manager, Community Board 1, Staten Island
Debbi Rose, NYC Council member 49th Council District

Joseph Borelli, NYC Council Member
Steven Matteo, NYC Council Member
Andrew Lanza, NYS Senator
Diane Savino, NYS Senator
Michael Cusick, NYS Assembly Member
Charles Fall, NYS Assembly Member
Michael O'Reilly, NYS Assembly Member

Comments on the River North DEIS 20DCP140R
Draft Environmental Impact Statement (DEIS)
CEQR Number 20DCP140R

River North (formerly Liberty Towers)
Proposed to be Built on

170 - 208 Richmond Terrace
&
8 - 26 Stuyvesant Place
Staten Island, NY 10301

The NYC Department of City Planning is New York City's lead review agency for *River North*. Its cover letter to this Draft Environmental Impact statement (DEIS) states, "Under SEQRA and CEQR, the lead agency is required to take a 'hard look' at the environmental impacts of proposed projects, . . ."

A reading of the entire Draft Environmental Impact Statement (DEIS), with Appendices immediately discloses that this DEIS does not fully address the impact of the multi-fold nature of the applicant's request that is specified within it. Firstly, the applicant is requesting a series of zoning text amendments to the *Special St. George District* of the *NYC Zoning Resolution*. The applicant's amendments will permit, among other variations, taller, denser buildings. Secondly, the applicant is requesting a zoning map amendment. This will detach the applicant's *River North* lots from its current R6 zoning and attach them to the now amended *Special St. George District*. Above and beyond these first two actions, the applicant is seeking a series of additional discretionary land use actions to permit the applicant's *River North* project to construct even taller and more dense buildings, covering more land, etc., than is even permitted under both the *NYC Zoning Resolution's Special St. George District* and its *Special Hillside Preservation District*.

These actions would allow the applicant's project to avoid complying with both the current provisions of both R6 zoning and Staten Island's 1987 *Special Hillside Preservation District*, and with the existing Staten Island's 2008 *Special St. George District zoning* to which it seeks attachment:

1. Staten Island's *Special Hillside Preservation District*, "protects a 1,900-acre area surrounding the Serpentine Ridge, a geologic feature formed by glacial shifts over 400 million years ago . . . The ridge provides unique scenic views of the surrounding area and is an important feature of the landscape and neighborhood character." NYC Planning.
<https://www1.nyc.gov/assets/planning/download/pdf/plans-studies/si-district-text-amendment/special-hillside-presentation.pdf>
2. Staten Island's *Special St. George District* "requires tall slender building form that reflects its hillside topography and maintains waterfront vistas." NYC Planning.
https://www1.nyc.gov/assets/planning/download/pdf/plans/st-george/st_george.pdf

Nowhere in the applicant's DEIS is there any discussion of the adverse impact of the permanent zoning changes on the *Special St. George District*.

Specifically, not addressed by the Draft Environmental Impact Statement (DEIS) submitted by the applicant, Richmond SI Owner LLC, are the ramifications of: “. . . a series of discretionary land use actions including a zoning map amendment, zoning text amendments, and a special permit (the “Proposed Actions”) from the City Planning Commission (CPC) to facilitate the development of a mixed-use project comprising residential and commercial uses, open space, and accessory parking (the “Proposed Development”) in the *St. George* neighborhood of Staten Island, Community District 1 (see Figure 1).” DEIS, p. E-1.

Two previous wholesale neighborhood re-zonings confirm the importance of accurate and reasoned Environment Impact studies. The research and the findings of a study on the rezoning two NYC neighborhoods were published in *A Tale of Two Rezoning; Taking a Harder Look at CEQR, The re-zoning of Long Island City and Downtown Brooklyn*. “The report demonstrates the failure of the City to predict the type and scale of new development that its zoning changes will stimulate, and studies the resulting impacts on open space, transit congestion, school seats, and other measures of livability” . . . The study includes the statement, “. . . when the City initiates a large-scale neighborhood rezoning plan, even one with laudable goals, New Yorkers deserve a reliable representation of expected development and a realistic evaluation of its impacts; too often, they receive neither.” [*A Tale of Two Rezoning; Taking a Harder Look at CEQR, The Municipal Arts Society, 2018, 75 pages, p. 4.*

<https://www.mas.org/news/a-tale-of-two-rezonings-ceqr/>

This DEIS is silent regarding the effect of its requested zoning changes to the *Special St. George District*. The DEIS only addresses the *River North* project which is not currently in the *Special St. George District*.

River North

The DCP's ‘hard look’ will disclose that NO mitigation is possible for many of the adverse effects of the *River North* construction project itself.

The applicant, Richmond SI Owner, LLC proposes the construction of three buildings:

Building 1 would be 293 feet high with 327 apartments.

Building 2 would be 265 feet high with 295 apartments.

Building 3 would be 152 feet with 128 apartments.

With 341 parking spaces. DEIS, pp. E-11 – E-12.

The Draft Environmental Impact Statement (DEIS) submitted by the applicant, Richmond SI Owner LLC, confirms that the applicant understands beforehand that buildings of such height and density are out of the question on the three lots that it owns. The DEIS states: “The Block 13 portion of the Project Area is in the *Special Hillside Preservation District*, and the Block 12 portion is outside any special purpose districts. An R6 district is mapped across the Project

Area with a C2-2 commercial overlay district within 100 feet of Richmond Terrace and Stuyvesant Place. Block 12, Lot 1 is also zoned R6 with a C2-2 overlay.” DEIS, p. E-1.

The applicant, Richmond SI Owner LLC, acknowledges that the *River North* project is at odds with a statement that it includes in the DEIS, “In the *Special Hillside Preservation District*, new developments on Tier II sites . . . are permitted up to a height of 36 feet (plus permitted obstructions). In R6 districts, building heights on Tier II (slope equal to or greater than 10%) sites are permitted up to 70 feet (plus permitted obstructions) . . .” DEIS, p. E-8.

Knowing this, the applicant still planned 3 overly tall buildings for the lots:

Building 1 would be 26 stories tall.

Building 2 would be 25 stories tall, and

Building 3 would be 11 stories plus a bulkhead tall.

Comments on the River North DEIS section Project Area

The applicant’s DEIS names the streets surrounding its project: “The Project Area is bound by Richmond Terrace to the north and east, Hamilton Avenue to the south, a distance of 185 feet west of Stuyvesant Place and Richmond Terrace to the south and west, and Nicholas Street to the west. The Project Area contains Block 12, Lot 1, Block 13 Lots 60, 68, 71, 73, 82, 92, and 100, and portions of Block 13 Lots 8, 116, and 119 . . .” DEIS, p. E-1

“Vehicular access and egress would be available to the accessory parking on the second and third floors via a curb cut to Hamilton Avenue. A second curb cut would be along Stuyvesant Place.” DEIS, p. 1-6.

The project area that the applicant describes consists of various contiguous lots, only 3 of which, according to NYC records, are owned by the applicant, Block 13, Lots 82, 92, and 100, which together contain 87,780 square feet. On this property proposed Buildings #1, 2, and 3 are projected to contain as many as 750 apartments. At 2.5 residents per dwelling, as many as 1,881 people might be added to the tax block, doubling its current population.

1. The applicant’s, Richmond SI Owner LLC’s, DEIS describes a project whose structures are over-sized, overly dense, out of context, and contrary to the *River North* project’s lots present zoning, which was purposely designed not to permit such height, etc., on Staten Island’s steep slopes.

The 3 *narrow streets*, as defined by the Zoning Resolution, that border *River North*, i.e., Stuyvesant Place, Hamilton Avenue, and Nicholas Street, are not equipt to handle the additional volume of vehicles that the *River North* project would generate:

a. Stuyvesant Place is a *narrow*, uphill, 4-block street that runs diagonally along a slope, from Richmond Terrace to Staten Island Borough Hall at Hyatt Street. It is a one-way street, with on-street parking on either side. It is lined with one-story retail and commercial establishments,

NYC government buildings, such as the Staten Island Borough Hall, NYC Department of Health office building, a college building and a pre-K among others. The slope of Stuyvesant Place, within the short block from Richmond Terrace to its intersection with Hamilton Avenue, is so great that it rises approximately one story above the building on Richmond Terrace, and as the applicant's DEIS states "The change in elevation allows a rooftop parking area to be accessed from Stuyvesant Place." DEIS, p. E-6, DEIS, Appendix A Architectural Drawings.

https://www.google.com/maps/place/Staten+Island+Buildings+Department/@40.6422402,-74.0765302,3a,75y,90t/data=!3m7!1e1!3m5!1sMgUtbzSmZzhxoUdxSVRiiw!2e0!6shttps:%2F%2Fstreetviewpixels-pa.googleapis.com%2Fv1%2Fthumbnail%3Fpanoid%3DMgUtbzSmZzhxoUdxSVRiiw%26cb_client%3Dmaps_sv.tactile.gps%26w%3D203%26h%3D100%26yaw%3D337.9214%26pitch%3D0%26thumbfov%3D100!7i16384!8i8192!4m5!3m4!1s0x89c24fd32663bdfb:0x42c69bee27eb94a!8m2!3d40.6422976!4d-74.0766212

At 45' wide, Stuyvesant Place is not as wide as many streets in Brooklyn's historic districts. For example, Willow Street, Pineapple Street, and Orange Streets in the *Brooklyn Heights Historic District* are 50' wide. <https://streets.planning.nyc.gov/?lat=-73.9954&layer-groups=%5B%22amendments%22%2C%22pierhead-bulkhead-lines%22%2C%22street-centerlines%22%5D&lng=40.6997&zoom=16.6>

b. Hamilton Avenue is an uphill street labelled in the applicant's DEIS as a "50' narrow street". Opposite 36 Hamilton Avenue, the projected *River North* Building #1 curb cut will be on Hamilton Avenue. It will serve the River North parking garage with a capacity of more than 300 vehicles. The building at 36 Hamilton Avenue has 120 apartments. Its parking garage beneath the building already has its entry and egress onto Hamilton Avenue nearly opposite River North DEIS Appendix A, Architectural Drawings. <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/appenda-deis.pdf>

Hamilton Avenue is a one-way street, with one lane of traffic for the 3 blocks between Richmond Terrace and St. Marks Place. There is on-street parking on both sides. On the *River North* project side, between the project site and St. Marks Place, there are five homes of 2.5 stories each, built between 1925 and 1930. Across from the project site, there are two larger, residential buildings, 36 Hamilton Avenue, a 6-story building finished in 1963, with 120 condominiums, and 60 Hamilton Avenue a 6-story building finished in 1965, with 109 apartments. Both buildings predate the *Special Hillside Preservation District* designation. <https://www.google.com/maps/@40.6452246,-74.0784271,3a,90y,264h,70.43t/data=!3m6!1e1!3m4!1sN-GFczENY3zW3PjeO8H60w!2e0!7i16384!8i8192>

Hamilton Avenue is the same width as many streets in Manhattan's historic districts, for example, McDougal Street, Sullivan Street, Jones Street and Thompson Street in *Greenwich Village Historic District*, and Mott Street and Elizabeth Street in the *Chinatown and Little Italy Historic District*. <https://streets.planning.nyc.gov/?lat=-73.9931&layer-groups=%5B%22amendments%22%2C%22pierhead-bulkhead-lines%22%2C%22street-centerlines%22%5D&lng=40.7245&zoom=16.6>

Which of these streets has a 26-story building bordering it?

c. The 50' narrow Nicholas Street is only 2 blocks long, intersecting St. Marks Place, Carroll Place, and Richmond Terrace. It runs downhill from the NYC landmarked Curtis High School.

St. Marks Place is as wide as Montague Street in *Brooklyn Heights*. Nicholas Street is wide enough for one lane of traffic and on-street parking on both sides of the street.

Based on audited registers on 10/31/2019, there were 2,476 students in Curtis High School. Across from Curtis High School, at the top of Nicholas Street, at its intersection with St. Marks Place, stands the edge of the *Castleton Park Apartments* property. This development was opened in 1976 with 454 apartments in two buildings and has a parking garage with an entrance and exit onto St. Marks Place.

On the other side of the intersection of Nicholas Street with St. Marks Place is 141 St. Marks Place, a six-story apartment building with 42 apartments, constructed in 1925. One block down the hill, at the intersection of Carrol Street with Nicholas Street is the 167 Carroll Place, completed in 1920, a two-story building with 14 apartments. At the bottom of Nicholas Street is a 40-apartment building with 3 retail spaces, the *View*, 224 Richmond Terrace, Block 13, Lot 60, completed in 2012. Once associated with Madison Realty Capital, it is a corner building with ground floor commercial space, and has a vehicular entrance and curb cut for entrance and egress onto Nicholas Street. Lastly, across from the *View* at the corner of Nicholas Street and Richmond Terrace is a 3-story mixed used building with 8 apartments. It was completed in 1920. https://www.google.com/maps/@40.6472978,-74.0806975,3a,75y,188.57h,107.24t/data=!3m7!1e1!3m5!1s6wnVaMMmxGNduFKwfme23Q!2e0!6shhttps:%2F%2Fstreetviewpixels-pa.googleapis.com%2Fv1%2Fthumbnail%3Fpanoid%3D6wnVaMMmxGNduFKwfme23Q%26cb_client%3Dmaps_sv.tactile.gps%26w%3D203%26h%3D100%26yaw%3D218.4316%26pitch%3D0%26thumbfov%3D100!7i13312!8i6656

Thousands of people already use the streets bordering the proposed *River North* project.

d. The main roadway in the area, Richmond Terrace, which fronts the *River North* project site in St. George, widens but only for a length of 7 blocks between Westervelt Avenue and the Staten Island Ferry Terminal, from one lane in each direction to two lanes in each direction with on-street parking. Currently, Richmond Terrace must accommodate fire trucks, police vehicles, ambulances, MTA S44, S94, S40, and S90 buses, school buses, bicycles, commuter automobile traffic to the Staten Island Ferry Terminal, commercial traffic, and the vehicles of the people who work in, or have business in, the public buildings, such as, schools, the NYC Health Department, Staten Island Borough Hall, Surrogate Court, Family Court, and the 120th Police Precinct. The planned Staten Island Rapid Bus Transit (BRT) will also travel along Richmond Terrace from Nicholas Street to the Staten Island Ferry Terminal bus ramps. Because of the essential vehicles gathered at the landmarked 120th Police Precinct station house, traffic towards the Staten Island Ferry frequently narrows to one lane in front of the precinct house.

[Kashiwagi, Sydney, “Debi Rose renews calls to move 120 Precinct to Stapleton to make way for Bus Rapid Transit, but NYPD has no plans to leave,” *Staten Island Advance*, December 12, 2019. <https://www.silive.com/news/2019/12/debi-rose-renews-calls-to-move-120-precinct-to-stapleton-to-make-way-for-bus-rapid-transit-but-nypd-has-no-plans-to-leave.html>]

At times of the day, the intersection of Westervelt Avenue and Richmond Terrace, among others, rates the lowest possible grade, an “F” level of service, on various traffic studies. DEIS 5-23.

A single traffic mishap along Richmond Terrace in the morning commute might cause mayhem.

e. The DEIS submitted by the applicant, Richmond SI Owner, LLC, describes the further problems that would be created for these surrounding roadways during the 4+ years construction project. It states:

“Staging, receiving, and other secondary construction activities would occur on Projected Development Site 1 and in the temporary sidewalk closures along Richmond Terrace, Stuyvesant Place, and Hamilton Avenue along the site’s frontage.

“Trucks would egress the site at the intersection of Richmond Terrace and Stuyvesant Place (Staging Area 2), where flaggers would assist truck traffic onto Richmond Terrace.

“Trucks and smaller vehicles may occasionally egress to Stuyvesant Place or Hamilton Avenue and use local streets to return to Richmond Terrace.

“Construction access would occur on all four sides of Buildings 1 and 2, and on three sides of Building 3. The construction access to multiple sides of the buildings would allow for more efficient construction than buildings of similar size with more limited construction access.

“Traffic lanes and sidewalks would be closed or protected during the construction period at varying lengths of time.

“Depending on the stage of construction, truck movements would generally occur between 6:00 AM and 3:00 PM . . .

“Due to construction activities, there would be temporary closing of on-street parking and sidewalks, but pedestrian circulation and access would be maintained through the use of a temporary sidewalk.

“During construction of Projected Development Site 1, the sidewalks and 8-foot-wide on-street parking lanes at the site’s frontage along Richmond Terrace, Stuyvesant Place and Hamilton Avenue would be closed to accommodate construction activities.” DEIS, pp. 11-9 - 11-10.

The entire *River North* project, with 750 apartments, 1,822 new residents and 95 employees, and approximately 19,000 square feet of commercial space in 3 hi-rise buildings with 341 parking spaces, is too large for the lots, and the current zoning, and too large to be absorbed by the surrounding area, including the roads that border it.

2. The *Special Hillside Preservation District* regulations state, “Notwithstanding the provisions of Section 78-06 (Ownership), a zoning lot having an average percent of slope of 10 percent or greater which is the subject of an application under this section may include adjacent properties in more than one ownership, provided that the application is filed jointly by the owners of all the properties included. Any subdivision of the tract before, during or after development shall be subject to the provisions of Section 78-51 (General Provisions)” 119-03.

<https://zr.planning.nyc.gov/article-xi/chapter-9>

According to a review of the latest NYC Department of Finance Records, the DEIS submitted by the applicant, Richmond SI Owner LLC, has included other owners' properties in this *River North* application. Specifically, current NYC Department of Finance records show that the following *River North*, formerly *Liberty Towers* lots in this River North DEIS are owned by others than the applicant:

Block 12, Lot 1 is owned by E&V Staten Island LLC., 140 Stuyvesant Pl. SI, NY 10301.

Block 13, Lot 8 is owned by Castleton Preservation Housing Company, Inc., 165 St. Marks Place, Staten Island, NY 10301.

Block 13, Lot 60 is owned (1/26/18) by AAB 224 Richmond Terrace LLC., 224 Richmond Terrace, Staten Island, NY 10301.

Block 13, Lot 68 is owned (11/24/20) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 71 is owned (1/20/21) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 73 is owned (11/24/2020) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 116 (12/12/2008) is owned by Borok Holding Company, LLC, 41 Hamilton Ave., SI, NY 10301.

Block 13, Lot 119, is owned by (individual person), 41 Hamilton Avenue, SI, NY 10301.

<https://a836-pts-access.nyc.gov/care/forms/htmlframe.aspx?mode=content/home.htm>

Is this a joint application by the multiple owners of all the other lots that are included in this *River North* DEIS?

3. Additionally, the plots that were previously associated with Madison Realty Capital, i.e., Lots 75, 78, 79, 80, 81, 103, and 104 of Block 13, and that are now owned by applicant, Richmond SI Owner, LLC, were merged into the Lots 82, 92, and 100 sometime during the 17 months between the August 29, 2018 *Environmental Assessment Report* of the *River North* site and the *NYC Department of Finance Tentative Assessment Role* dated January 5, 2020. The EAS identified the lots as being in a "hillside" district.

[https://www.dec.ny.gov/data/DecDocs/C243045/Application.BCP.C243045.2018-08-](https://www.dec.ny.gov/data/DecDocs/C243045/Application.BCP.C243045.2018-08-29.Phase%20I%20Environmental%20Site%20Assessment%20Report-Environmental%20Business%20Consultants.pdf)

[29.Phase%20I%20Environmental%20Site%20Assessment%20Report-Environmental%20Business%20Consultants.pdf](https://www.dec.ny.gov/data/DecDocs/C243045/Application.BCP.C243045.2018-08-29.Phase%20I%20Environmental%20Site%20Assessment%20Report-Environmental%20Business%20Consultants.pdf)

On the NYC Department of Finance website, these lots which when combined altogether are approximately 2 acres, are the only ones listed as owned by the applicant, Richmond SI Owner LLC, for whom this DEIS is submitted:

Block 13, Lot 82, 100'x151'.

The new Block 13, Lot 82 at 100'x151' is smaller than the 2018 size of 171'x164'.

Block 13, Lot 92, 144'x184'.

Block 13, Lot 100 251'x184'. <https://a836-pts-access.nyc.gov/care/forms/htmlframe.aspx?mode=content/home.htm>

The Draft Environmental Impact Statement (DEIS) submitted by the applicant, Richmond SI Owner LLC, acknowledges, "The Block 13 portion of the Project Area is in the *Special Hillside Preservation District*, and the Block 12 portion is outside any special purpose districts. An R6 district is mapped across the Project Area with a C2-2 commercial overlay district within 100

feet of Richmond Terrace and Stuyvesant Place. Block 12, Lot 1 is also zoned R6 with a C2-2 overlay.” DEIS, p. E-1.

The purpose of the current R6 zoning and *Special Hillside Preservation District (1987)* designation for Block 13, within which the *River North* project property is located, is to protect the character of the neighborhood and the topography of the hillside. To that end both the lot coverage and building height are restricted: “For any development or enlargement the maximum height of a building or other structure or portion thereof shall be than which is shown in Table II . . . Table II . . . Zoning District R6, Maximum Height 70 feet.” 119-212 *Special Hillside Preservation District*. 1987.

Despite that the fact that the applicant’s project is at odds with the land’s current zoning, the applicant has pursued the construction of the 3 buildings of the *River North* project for several years.

As NYC planners concluded almost thirty years ago in 1992, “North Shore Staten Island Redevelopment should respect the site’s topography and historic structures.” Department of City Planning NYC DCP 92-27.

http://www.deltacityofthefuture.nl/documents/NYC_comprehensive_waterfront_plan.pdf

Comments on the River North DEIS section Project Description

1. The DEIS submitted by the applicant, Richmond SI Owner LLC describes the 2008 request of the owner of the same land to the NYC Planning Commission for Projected Development Site #1 stating, “In 2008, applications for CPC (City Planning Commission) authorizations were filed by Richmond Mountainside Properties, LLC, . . . to permit on Projected Development Site 1: . . . a conditional negative declaration was issued in June 2008 (CEQR No. 08DCP049R). The conditional negative declaration imposed conditions requiring an archaeological investigation prior to any development . . . These applications were never advanced or approved, and the site has remained vacant with overgrowth vegetation, except for building foundation remnants on Lot 82.” DEIS, p. 1-4.

If the applicant’s request is to permit the construction of 3 buildings on the same site as proposed by Richmond Mountainside Properties LLC in 2008, is an archeological investigation required prior to development? Has the NYC DCP requested that Richmond SI Owner, LLC have an archeological investigation conducted?

2. In various sections of the applicant’s DEIS, the number of the parking spaces and the height of the *River North’s* buildings differ:

a. In the DEIS submitted by the applicant, Richmond SI Owner LLC, the number of parking spaces given in Table 1-1 on p. 1-5, is 331; the number given in the Executive Summary in Table 1 on p. E-11 is 341 parking spaces.

- b. In the DEIS submitted by the applicant, Richmond SI Owner LLC, the height of *River North* Building 1 is given as 291 feet on p. 1-6, but Building 1 height is listed as 293 feet in Table 1 on p. E-11 as well as in Table 1-1 on page 1-5. On page 1-9, the height of Building 1 is given as 298 feet.
- c. In the applicant's DEIS on page 1-9, the height of *River North* Building 2 is given as 270 feet, while on page E-11, Table 1, Building 2 is projected to be 265 feet high.
- d. In the DEIS submitted by the applicant, Richmond SI Owner LLC, *River North* (formerly *Liberty Towers*), the height of Building 3 is given as 152 feet in Table 1, page E-11, but it is given as 155 feet on page E-12, and 157 feet on page 1-9.

Should the figures within the DEIS be consistent?

Comments on the DEIS section Development Site

1. The future of the *Castleton Park Apartments* "Panhandle" area in the *River North* project area is unclear. The DEIS submitted by the applicant, Richmond SI Owner LLC states, "Block 13, Lot 8 (the "Castleton lot"), a 209,088-sf irregular lot with frontage along Stuyvesant Place, St. Marks Place, and Nicholas Street. The Castleton lot contains the *Castleton Park Apartments*, which comprise two multi-family residential height factor buildings, an accessory parking garage, and private recreation areas. The portion of the Castleton lot nearest Stuyvesant Place ("Tentative Lot 95") is a panhandle shape that separates the Site A and Site B portions of Projected Development Site 1. Independent of the Proposed Actions, the Applicant will acquire Tentative Lot 95 of the Castleton lot, the area within 185 feet of Stuyvesant Place (9,428 sf)." DEIS p. 1-4.

The applicant's DEIS also states, "The acquisition would also allow Projected Development Site 1 to be one zoning lot in the With-Action Condition (but not the No-Action Condition because the open space is required to meet the height factor requirements of R6 on the Castleton lot)." DEIS, p. E-6.

- a. Please clarify the status of Block 13, Lot 8. When the two buildings that comprise the *Castleton Park Apartments*, at 165 and 185 St. Marks Place, were constructed in 1976 on a 209,088 sq. ft. lot, as part of the approval for its construction, was a portion of land extending to Richmond Terrace between *River North* Site A and *River North* Site B specified to be kept as open land? <https://zola.planning.nyc.gov/lot/5/13/8?aerial-year=aerials-2016&layer-groups=%5B%22building-footprints%22%2C%22commercial-overlays%22%2C%22street-centerlines%22%2C%22subway%22%2C%22tax-lots%22%2C%22zoning-districts%22%5D&print=false&search=false&selectedOverlays=%5B%22C1-1%22%2C%22C1-2%22%2C%22C1-3%22%2C%22C1-4%22%2C%22C1-5%22%2C%22C2-1%22%2C%22C2-2%22%2C%22C2-3%22%2C%22C2-4%22%2C%22C2-5%22%5D&selectedZoning=%5B%22BP%22%2C%22C1%22%2C%22C2%22%2C%22C3%22%2C%22C4%22%2C%22C5%22%2C%22C6%22%2C%22C7%22%2C%22C8%22%2C%22M1%22%2C%22M2%22%2C%22M3%22%2C%22PA%22%2C%22R1%22%2C%22R10%22%2C%22R2%22%2C%22R3%22%2C%22R4%22%2C%22R5%22%2C%22R6%22%2C%22R7%22%2C%22R8%22%2C%22R9%22%5D&shouldRefresh=false#16.68/40.645833/-74.078228>

b. Additionally, please verify whether or not the following stipulation of the Zoning Resolution is applicable to Block 13, Lot 8 - “In any subdivision of a large-scale residential development for which such modifications were granted, covenants running with the land which shall permit of public or private enforcement, reflecting the terms, conditions and limitations of the large-scale residential development plan, as approved, shall be incorporated in the deed to each parcel conveyed.” 78-51. <https://zr.planning.nyc.gov/article-vii/chapter-8#78-51>

2. The DEIS submitted by the applicant, Richmond SI Owner LLC acknowledges, “The projected development sites generally slope up from lower elevations along Richmond Terrace frontage to higher elevations to the west. Almost the entirety of both projected development sites is in the *Special Hillside Preservation District* . . .” DEIS, p. E-6.

For decades, the NYC Department of City Planning has taken a position to safeguard the natural hillside terrain. When the *Special Hillside Preservation District* was created in 1987, one of the commissioners was publicly quoted as saying, “For the first time, zoning recognizes that the world is not flat.” Marilyn Mammano, NYC Planning Commissioner, 1987. *New York Times*, July 19, 1987, Section 8, p.1.

In 1987, in reaction to problems caused by residential construction, that did not account for the local hilly terrain, the New York City Planning Commission created a special Staten Island district to “protect, maintain and enhance the natural features” such as the slope of the hillside and “to protect the neighborhood character of the district.” At the time of its creation, 11% of the lots in the *Special Hillside Preservation District* were vacant and consisted of 55% with an average angle of slope of 10% to 35%, 9% with an average slope of 35% or more, and 36% with an average percent of slope of less than 10%.”

At that time the NYC Planning Commission stated, “As the most readily developable areas have been exhausted, the more steeply sloped hillsides which characterize much of the remaining vacant acreage have become prime development sites. [p. 2] . . . the Commission finds that this District will preserve the unique natural features on the North Shore – the hillsides – while guiding development in a way which is harmonious with the unique topography and in character with the established neighborhoods. [p.7] . . . No development, enlargement or site alteration is permitted on any portion of a zoning lot having a slope of 35% or more. Said portion of a zoning lot shall remain in its natural state, unless an authorization is granted by the City Planning Commission pursuant to Section 119-30 (Special Review Provisions) . . .” 119-02 *Special Hillside Preservation District*. <https://www1.nyc.gov/assets/planning/download/pdf/about/cpc/870002.pdf>

The DEIS submitted by the applicant, Richmond SI Owner LLC, does not specifically describe the percentage of steep slope of the *River North* lots in its narrative. The slopes may be marked on maps submitted in the DEIS Appendix A, but they are not clearly discernable when viewed digitally. In 1987 when the *Special Hillside Preservation District* was enacted, over half of the vacant lots had a slope between 10% and 35%. Examples of other slopes can be found in New York and be compared to the description of slopes in the *Special Hillside Preservation District*. For example, *Perkins Memorial Drive* in *Bear Mountain State Park* has a 6% grade. In the Adirondacks Mountains, Route NYS 86 to *Whiteface Mountain* has an 8% grade. *Hunter Mountain Ski Resort* has a variety of ski slopes. Beginner ski slopes generally have a slope

between 6% and 25% grade and the grade of Intermediate ski slopes is usually between 25% and 40%. So, the slopes of much of the vacant lots within the *Special Hillside Preservation District* were known to be similar to that of ski slopes when the *Special Hillside Preservation District* was established.

The New York Times (Sunday, July 19, 1987 Section 8, p.1 & 20) described the area of the *Special Hillside Preservation* district on Staten Island: “. . . (It) covers the bulk of the slopes on the north shore of Staten Island around Clove Lakes, Silver Lake and Sailors Snug Harbor . . . The major hills of Staten Island rise from the ferry terminal in St. George and run almost like a spine through the center of the island. . . The district covers 1,900 acres, of which about 300 acres are steeply sloped . . . The regulations effectively shape new buildings . . .”

<https://timesmachine.nytimes.com/timesmachine/1987/07/19/issue.html>.

The area of Staten Island’s *Special Hillside Preservation District* is outlined and designated “HS” on the NYC Planning Department Maps website at [21a](#), [21b](#), [21c](#), [21d](#).

In August, 2018, a report about the Block 13, Lots 82, 92, and 100, now identified as owned by the applicant, Richmond SI Owner LLC, described the property’s topography. “. . . This report was prepared in August 2018 by EBC at the request of Mr . . . representing Madison Realty Capital . . . (Lot Nos. 75, 78, 79, 80, and 81) and (Lot Nos. 82, 92, 100, 103, and 104) . . . The elevation of the subject property ranges from approximately 90 feet above mean sea level (amsl), along its western boundary to 45 feet amsl at the east-central portion along Richmond Terrace. The subject property is moderately sloped with the general topographic gradient sloping downward to the east-northeast.”

<https://www.dec.ny.gov/data/DecDocs/C243045/Application.BCP.C243045.2018-08-29.Phase%20I%20Environmental%20Site%20Assessment%20Report-Environmental%20Business%20Consultants.pdf>

This EIS would seem to imply that Madison Realty Capital was aware, as early as September, 2018 that the lots on Block 13 were in a “hillside” area subject to restrictions.

3. In the description of the *River North* ‘Development Site’, the DEIS submitted by the applicant, Richmond SI Owner LLC, includes Block 13, Lot 60, and states, “Lot 60 is developed with a 58,795 gsf multi-family residential building, “The *View*,” which has 40 dwelling units (DUs) and ground floor retail.” DEIS, p. E-6.

According a *Staten Island Advance* article of January 17, 2018, Madison Realty Capital purchased and completed the construction of a “luxury” building, the *View*, which is 11 stories tall and located at 224 Richmond Terrace, almost a decade ago: “Several years ago we were presented with a terrific opportunity to purchase the debt and complete construction on the *View* and we achieved great success.” [Porpora, Tracey, “St. George apartment building with a ‘view’ sells for \$20M.” *Staten Island Advance*, January 27, 2018. https://www.silive.com/news/2018/01/the_view_apartments_in_st_geor.html]

a. Was NYC Department of City Planning approval required for this 11-story building, the *View* at 224 Richmond Terrace? It was constructed within an R6, *Special Hillside Preservation District* which according to the applicant’s DEIS would have limited the height of the building to at most, seven stories.

b. Does inclusion of the *View* in this DEIS require that the NYC Department of City Planning verify that this building meets all applicable zoning regulations?

These questions are asked here, because although the NYC Department of Buildings is responsible for ensuring that the zoning regulations are followed, and other documents relating to the *View* are located on the NYC Department of Buildings website, zoning documents are not. NYC DOB website states: “Please note, once a document is approved, it may take up to 48 hours for the document to be processed, scanned, and available to view online. . . No Scanned Zoning Documents Found For This JOB.” <http://a810-bisweb.nyc.gov/bisweb/JobZoningDocumentsServlet?requestid=5&allisn=0001461598&passjobnumber=500773175&passdocnumber=01&allbin=5000107>

c. Does the building at 224 Richmond Terrace reflect the necessary compliance with the *Special HillSides Preservation District* zoning regulations, including among others:

“The maximum permitted percentage of lot coverage on a zoning lot shall be determined by Table I or Table II of this Section, as applicable.” - 119-212 *Special HillSides Preservation District*; and “For any development or enlargement the maximum height of a building or other structure or portion thereof shall be than which is shown in Table II . . . Zoning District R6, Maximum Height 70 feet.” 119-212 *Special HillSides Preservation District*. <https://zr.planning.nyc.gov/article-xi/chapter-9>

4. The DEIS states “. . . In the No-Action Condition, the Site A portion of Projected Development Site 1 would remain vacant because provisions of the *Special HillSides Preservation District* that protect steep slope and steep slope buffers make development of this site difficult to develop as-of-right.” DEIS, p. E-13.

The applicant purchased the property knowing the restrictions on its development and it is within the applicant’s rights to either build within the current zoning restrictions or leave it vacant.

The alternative to building is less reduction of passive open space. As the *North Shore 2030* plan states: “Open space is scarce compared to the rest of Staten Island, particularly in St. George. . .” https://www1.nyc.gov/assets/planning/download/pdf/plans-studies/north-shore/north_shore2030.pdf

The construction of the incomplete *NY Wheel* parking garage and reception center cemented over the landscaped, waterfront level, open air parking fields next to the *Richmond County Bank Ballpark*. As a result of the construction work, the landscaped, water-level Waterfront Esplanade was eliminated. The *Empire Outlets* mall was constructed over the open-air waterfront level Municipal Parking lot. Both the garage and the *Empire Outlets* mall have reduced pedestrian views from Richmond Terrace. Open Space is in shorter supply than ever. [Sammon, Alexander, “The Rise and Fall of the New York Wheel”, March 20, 2019 *The New Republic*. <https://newrepublic.com/article/153348/rise-fall-new-york-wheel>]

Comments on the River North DEIS section Neighborhood Context

1. The DEIS submitted by the applicant, Richmond SI Owner LLC states, “Several multi-family buildings exist in the Study Area’s R3A district, a district that permits only one- and two-family detached or zero lot line (semidetached) housing types and community facility uses.” DEIS, p. E-7.

Without knowing to which specific buildings the *River North* DEIS is referring, the general reply to this statement is: The R3A zoning, now in existence, postdates the construction of the buildings to which the DEIS submitted by the applicant, Richmond SI Owner LLC, alludes. These buildings were most likely constructed before the area was re-zoned to a lower density in response to over-building. Maps of the previous zoning for this neighborhood, as well as any exemptions made, are on file with the NYC Planning Department. For example, the 1961 NYC Planning Map for this neighborhood shows a larger R6 area than the present. The downzoning was made in reaction to the destruction of the naturally occurring topography. In effect, the NYC Planning Commission being asked to give permission to add more out of character structures to the area by amending the Zoning Resolution to permit out-of-size buildings on the *River North* project site. <https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-maps/historical-zoning-maps/maps21c.pdf?r=091820>.

2. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “To the north of the Project Area and across Richmond Terrace is the site of the dormant *NY Wheel* project. The site has an operating multi-level parking facility.” DEIS, p. E-7.

The *NY Wheel*, for which zoning changes to publicly-owned lands managed by the NYC Economic Development Corporation were approved by the NYC Planning Commission, is an incomplete, and failed project. <https://www1.nyc.gov/assets/planning/download/pdf/about/cpc/150447.pdf>

Preliminary construction for the *NY Wheel*, which was halted in 2017, obliterated an existing, landscaped and accessible publicly owned waterfront, the *Waterfront Esplanade* and the landscaped publicly owned parking fields to the west of the publicly owned *Richmond County Bank Ballpark*. The *NY Wheel*’s four unused, huge concrete and steel footings still futilely burst forth from the land. An illustration of the destroyed *Waterfront Esplanade* and *9/11 Memorial* situated on it, pre-Wheel construction, can be seen at: <https://www.nycgo.com/attractions/staten-island-september-11-memorial/>

The still unfinished \$60 million, 950-space multi-story concrete *NY Wheel* parking garage, which replaced the landscaped open-air, ground level ballpark and ferry parking, is a financial abyss and appears closed. The NYC Economic Development Corporation has re-taken management of the projected site. From the pedestrian level on Richmond Terrace, the view of Upper New York Bay is now obstructed along the length of the building. There is no grass covered, green roof as appears in the *River North Appendix A* cover sheet illustration. It is concrete. An extensive group of photographs of the site was published in 2018 in the *Staten Island Advance*. [Bascome, Eric, “City Working to Keep New York Wheel Parking Garage Open,” *Staten Island Advance*, October 24, 2018. <https://www.silive.com/news/2018/10/city-working-to-keep-new-york-wheel-parking-garage-open.html>.]

Should the *NY Wheel* or any iteration of it be resurrected, the traffic along Richmond Terrace would increase exponentially. The construction for the *NY Wheel*, and its parking garage, on Richmond Terrace contributed to increased congestion along Richmond Terrace from Jersey Street to the Staten Island Ferry Terminal/St. George. Bicycles, and automobile traffic from the West along Richmond Terrace headed to ferry parking were once diverted downwards at Jersey Street and towards the shorefront by way of Bank Street. Since the beginning of the construction Bank Street has been closed. Traffic to the terminal now converges onto Richmond Terrace and shares the road with fire trucks, police vehicles, ambulances, the MTA S44, S94, S40, and S90 buses, school buses, commercial traffic, and the vehicles of people who work in, or have business in St. George's public buildings, such as, schools, the NYC Health Department, Staten Island Borough Hall, Surrogate Court, Family Court, and the 120th Police Precinct. The Staten Island Rapid Bus Transit (BRT) will also travel along Richmond Terrace from Nicholas Street to the Staten Island Ferry Terminal bus ramps. Because of the essential vehicles located at the police precinct, Richmond Terrace frequently narrows to one lane of traffic traveling in the direction of the Staten Island Ferry Terminal/St. George. [Kashiwagi, Sydney, "Debi Rose renews calls to move 120 Precinct to Stapleton to make way for Bus Rapid Transit, but NYPD has no plans to leave," *Staten Island Advance*, December 12, 2019. <https://www.silive.com/news/2019/12/debi-rose-renews-calls-to-move-120-precinct-to-stapleton-to-make-way-for-bus-rapid-transit-but-nypd-has-no-plans-to-leave.html>]

At busy times of the day, the intersection of Wall Street and Richmond Terrace, among others, rates the lowest possible grade, an "F" level of service, in various traffic studies: DEIS 5-28. <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/05-deis.pdf>

The garage has yet to bear any resemblance to the developer's idyllic, verdant, sales-pitch vision touting, "a green roof used as a concert venue and picnic area, where at least 18 concerts per year were planned . . ."

The leftover concrete and steel remnants of the dead *NY Wheel* project and its empty concrete, pedestrian-view blocking parking garage and reception center currently function solely as a reminder of the *Law of Unintended Consequences*."

3. In this section of the DEIS submitted by the applicant, Richmond SI Owner LLC, states, "Just beyond the ballpark and outside the Study Area is the recently completed *Empire Outlets*, an outlet mall with several privately-owned publicly accessible open spaces, underground parking, and a hotel." DEIS, p. E-7.

The *Empire Outlets* was leased from the New York City Economic Development Corporation in 2014. It was opened in 2019. Most of its space is still vacant. The *Empire Outlets* mall was lagging before the pandemic shutdown. Of the 100 proposed shops, only about 30 had opened. There is no hotel. [Michel, Clifford, "Three Months In, City's First Outlet Mall is Barely One-Third Full", August 27, 2019, *The City* <https://www.thecity.nyc.gov/staten-island/2019/8/27/21212460/three-months-in-city-s-first-outlet-mall-is-barely-one-third-full>]

It "cost \$350 million to build. Nearly \$100 million of that came from state and city subsidies, according to [the project plan](#) approved by the state development authority. . . The aid included an \$11.5 million city-funded grant in 2016, EDC [reported](#) to the state Authorities Budget

Office. That ABO report also lists an \$8.5 million, 30 year loan at 3% interest to a similarly named firm that has received past EDC support . . .” [Michel, Clifford, “Staten Island Outlet Mall Struggles to Pay Back \$8.5 Million City Debt, September 1, 2020, *The City*. <https://www.thecity.nyc/staten-island/2020/8/31/21409583/empire-outlet-mall-staten-island-city-debt>.]

On the east side of the ferry terminal, there is another, separate project, *Lighthouse Point*, also part of the NYC Economic Development Corporation’s plans for St. George. It was to include a hotel, but not in its first phase. <https://edc.nyc/project/lighthouse-point>. In 2019 this project, too, suffered from bankruptcy. <https://www.silive.com/news/2019/12/exclusive-lighthouse-point-project-delayed-contractor-files-for-chapter-11-bankruptcy.html>. After 5 years, phase 1 of the *Lighthouse Point* project, a mixed-use, multi-story building is still incomplete, scaffolded and barricaded along Bay Street next to the ferry terminal. The developer’s website, Triangle Equities, is at: <https://www.triangleequities.com/lighthouse-point-phase-i/>

In short, all these examples, provided by the applicant, Richmond SI Owner LLC, which is seeking “a series of discretionary land use actions including a zoning map amendment, zoning text amendments, and a special permit (the “Proposed Actions”) from the City Planning Commission (CPC) to facilitate the development . . .”, should serve as a cautionary tale to both the NYC Planning Commission and to the NYC Economic Development Corporation about placing their full faith in developers’ presentations to NYC regulatory authorities and agreeing to re-zoning, that allows investment entities to take advantage of taxpayer dollars without any guaranteed return on, or repayment of, taxpayers’ dollars. The people of NYC and in these several cases, of Staten Island, have to literally live with the consequences for years.

Comments on the River North DEIS section Purpose and Need

In this section, the applicant is asked to describe the purpose and need of the application.

The DEIS submitted by the applicant, Richmond SI Owner LLC, describes the framework for its DEIS analyses and conclusions. It makes this statement, “Analysis Framework. The 2020 *CEQR Technical Manual* will serve as guidance on the methodologies and impact criteria to evaluate the potential environmental effects of the Proposed Actions. Consistent with the guidelines set forth in the *CEQR Technical Manual*, existing conditions will be described.” DEIS, p. 1-7.

1. In this purpose and need section, the DEIS submitted by the applicant, Richmond SI Owner LLC, states, “2. The hillside within the Project Area has been compromised by historical and surrounding development including the parking garage of the *Castleton Park Apartments*, and previous development that was demolished in the late 1970s; foundations still remain on Site B.” DEIS, p. E-10.

The *Castleton Park Apartments* two buildings contain 454 “affordable” units. It opened in 1976 on a lot size of 209,088 sq. ft. or 4.8 acres, and with a total gross floor area of 524,513 sq. ft. Its

construction pre-dated the *Special Hillside Preservation District* that was created in 1987. *River North's* projected Buildings 1, 2, and 3 on Block 13, Lots of 82, 92, and 100 will comprise 699,495 sq. ft. of residential and retail space on a combined lot size of 87,780 square feet or 2.02 acres. That is only 42% of the lot size of the *Castleton Park Apartments*. DEIS, E-11.

So, not only do the *Castleton Park Apartments* have more than twice the land area as the applicant's, as well as only 75% of the developed square footage as the applicant's *River North*, they have only 60% of the number of the apartments of the *River North* proposal. So, the two buildings of the *Castleton Park Apartments*, even though non-conforming, are less dense and have more open space than the *River North* proposal. Thus, the *Castleton Park Apartments* are significantly less non-conforming than the proposed *River North* project and using them as an example of purpose and need is not well-grounded.

<https://zola.planning.nyc.gov/l/lot/5/13/8?aerial-year=aerials-2016&layer-groups=%5B%22building-footprints%22%2C%22commercial-overlays%22%2C%22street-centerlines%22%2C%22subway%22%2C%22tax-lots%22%2C%22zoning-districts%22%5D&print=false&search=false&selectedOverlays=%5B%22C1-1%22%2C%22C1-2%22%2C%22C1-3%22%2C%22C1-4%22%2C%22C1-5%22%2C%22C2-1%22%2C%22C2-2%22%2C%22C2-3%22%2C%22C2-4%22%2C%22C2-5%22%5D&selectedZoning=%5B%22BP%22%2C%22C1%22%2C%22C2%22%2C%22C3%22%2C%22C4%22%2C%22C5%22%2C%22C6%22%2C%22C7%22%2C%22C8%22%2C%22M1%22%2C%22M2%22%2C%22M3%22%2C%22PA%22%2C%22R1%22%2C%22R10%22%2C%22R2%22%2C%22R3%22%2C%22R4%22%2C%22R5%22%2C%22R6%22%2C%22R7%22%2C%22R8%22%2C%22R9%22%5D&shouldRefresh=false#16.68/40.645924/-74.078703>

2. In this purpose and need section, the DEIS submitted by the applicant, Richmond SI Owner LLC, states, “3. The Project Area is at the very edge of the *Special Hillside Preservation District* . . .” DEIS, p. E-10.

Once again, the question is, “Is this a well-grounded justification of need or of purpose? The *River North* project area could equally be said to lie at the beginning of the *Special Hillside Preservation District* at its edge on Richmond Terrace. There is always an edge to every lot and to every planning zone. The location was taken into account by the NYC Planning Commission when it created the *Special Hillside Preservation District* in 1987.

The thirteen members of the NYC Planning Commission are being asked to accept the developer's preceding two arguments as statements of Purpose and Need, i.e., the presence of non-conforming *Castleton Park Apartments* on a lot size of 209,088 sq. ft., lying within the *Special Hillside Preservation District's* boundary, and the *River North* project lying at the edge of the *Special Hillside Preservation District*, as reasons to grant the applicant's request for a “series of discretionary land use actions including a zoning map amendment, zoning text amendments, and a special permit.”

If accepted, these arguments will be used as precedents. Henceforth, every time a developer applies to remove a parcel of land from the “*Special Hillside Preservation District*”, the same arguments will be used, biting off more and more pieces of it, until the entire district is eradicated.

Using this DEIS argument, pieces of the *Special Hillside Preservation District* will be removed to accommodate buildings which do not conform to its requirements, and the *Special Hillside Preservation District* will have newer and newer edges, and a smaller and smaller land area. In short, the arguments presented by the applicant's DEIS form a set of illogical logic that may be used as the thin edge of the wedge, systematically chopping off the topography's current zoning protections.

3. In this purpose and need section, the DEIS submitted by the applicant, Richmond SI Owner LLC states, "Development under the Proposed Actions would respond to the site's location as a gateway to *Downtown Staten Island* and St. George, and would capitalize on the Project Area's proximity to mass transportation. Similar to other recent development along Richmond Terrace and Bay Street - such as the *Empire Outlets* and *Lighthouse Point* - the Proposed Project would provide housing, including affordable options, active retail, and privately owned, publicly accessible open space. The proposed zoning map and text amendments - along with the special permit that would be created through the proposed text amendments - would allow the building location and massing to respond to the surrounding urban context and support a superior site plan and better urban design. DEIS, p. E-11.

a. The applicant is entitled to think of, and label the *River North* project as a "gateway". Meaning no disrespect to the project's designers, others might think of *River North's* proposed series of oversized looming buildings as a blockade. The landmarked 120th Police Precinct on Richmond Terrace could just as easily be labelled a "gateway" to the area. That building is the first of a chain of landmarked buildings in the direction *Staten Island Borough Hall*.

b. *Downtown Staten Island* referred to by the applicant remains a developer's or a realtor's aspiration; it is not a local's point of reference. Just as in Manhattan, locals go to the *Village* or to *Chinatown*, or to *Yorkville*, or to the *Heights* or to *Inwood*, on Staten Island, locals go to *St. George* or to *Stapleton*. [Somma-Hammel, Jan, "St. George: Then, Now, and What's Coming in the Future", April 11, 2017. *Staten Island Advance*. https://www.silive.com/seen/2017/04/st_george_then_now_and_whats_t.html]

c. The building location and massing would not be responding to any "surrounding urban context" as most people would envision it. The *River North* project would be establishing its own high-density, reduced open space enclave. Opposite the project site, on Hamilton Avenue there is a combination of two six story apartment buildings on one side and five 2.5 story homes on the other. Behind and above the *River North* site, the *Castleton Park Apartments* have more than twice the land area as the applicant's, as well as only 75% of the developed square footage as the applicant's *River North*, and the *Castleton Park Apartments* have only 60% of the number of the apartments of the *River North* proposal. On the other side of the intersection of Nicholas Street with St. Marks Place is 141 St. Marks Place, a six-story apartment building with 42 apartments, constructed in 1925. One block down the hill, at the intersection of Carrol Street with Nicholas Street is the 167 Carroll Place, completed in 1920, a two-story building with 14 apartments. At the bottom of Nicholas Street is a 40-apartment building with 3 retail spaces, the *View*, 224 Richmond Terrace, Block 13, Lot 60, completed in 2012. At the opposite the corner of Nicholas Street and Richmond Terrace is a 3-story mixed used building with 8 apartments. It

was completed in 1920. On Richmond Terrace, the applicant's lots are vacant. Opposite the River North site, there is a parking garage.

The Department of Environmental Conservation website posts a document which "Appendix A, Representative Site Photographs", provides many photographs of the area surrounding the River North construction site: <https://www.dec.ny.gov/data/DecDocs/C243045/Application.BCP.C243045.2018-08-29.Phase%20I%20Environmental%20Site%20Assessment%20Report-Environmental%20Business%20Consultants.pdf>

d. With no disrespect meant to the designers/architects, the applicant does not provide any evidence to support the statement that *River North's* is "a superior site plan and better urban design." There is no evidence to support the need to destroy the topography of the area, to build a large building which, according to current NYC Planning documents, is out of context.

e. The applicant's presentation, within the purpose and need section, of these other St. George projects, such as the *Empire Outlets* and *Lighthouse Point*, should give pause. None of them have fulfilled their developers' promises:

i. In the *Special St. George District*, the *Empire Outlets* mall was opened in 2019. Its space is still mostly vacant. The *Empire Outlets* mall was lagging before the pandemic shutdown. Of the 100 proposed shops, only about 30 had opened. <https://www.thecity.nyc/staten-island/2019/8/27/21212460/three-months-in-city-s-first-outlet-mall-is-barely-one-third-full> It "cost \$350 million to build. Nearly \$100 million of that came from state and city subsidies, according to the project plan approved by the state development authority. . . The aid included an \$11.5 million city-funded grant in 2016, EDC reported to the state Authorities Budget Office. That ABO report also lists an \$8.5 million, 30 year loan at 3% interest to a similarly named firm that has received past EDC support . . ." [Michel, Clifford, "Staten Island Outlet Mall Struggles to Pay Back \$8.5 Million City Debt, September 1, 2020, *The City*. <https://www.thecity.nyc/staten-island/2020/8/31/21409583/empire-outlet-mall-staten-island-city-debt.>]

ii. The *Lighthouse Point* project developer, selected for the site by the NYC Economic Development Corporation fifteen years ago, in 2006, has not completed any dwelling or retail construction. <https://edc.nyc/project/lighthouse-point>. Only one hi-rise at the *Lighthouse Point* was started six years ago. It has suffered from bankruptcy issues. The site is still scaffolded and barricaded at street level. [Popera, Tracy, "Exclusive: Lighthouse Point project delayed; contractor files for Chapter 11 bankruptcy", December 13, 2019, *Staten Island Advance*. <https://www.silive.com/news/2019/12/exclusive-lighthouse-point-project-delayed-contractor-files-for-chapter-11-bankruptcy.html>.]

4. According to the *CEQR Technical Manual*, November 2020 Edition, page 4-14, "A preliminary assessment of public policy should identify and describe any public policies, including formal plans or published reports that pertain to the study area. If the assessment concludes that the proposed project could alter or conflict with identified policies, a detailed assessment should be conducted." https://www1.nyc.gov/assets/oec/technical-manual/04_Land_Use_Zoning_and_Public_Policy_2020.pdf

The applicant's DEIS states, "Overall, the Proposed Actions are consistent with public policies such as *OneNYC*, *Housing New York*, and *North Shore 2030* and would accomplish multiple land use goals for the neighborhood, borough and the City." DEIS, p. E-11.

The applicant's DEIS does not specify which are the elements in *OneNYC, Housing New York, and North Shore 2030* that the River North project promotes. The DEIS states, "Overall, the Proposed Actions would provide additional residential units, including affordable options, in a manner consistent with public policies such as *OneNYC, Housing New York, and North Shore 2030*. DEIS, p. 1-7.

The applicant's proposed actions are not consistent with many public policies stated in plans cited within this purpose and need section:

a. The *OneNYC* plan, released 6 years ago in April, 2015, states, "Of the more than 14,000 respondents to our citywide survey, 57 percent selected transportation and infrastructure as a challenge facing the City." This *River North* project is not consistent with this goal. Transportation has not been improved on the North Shore of Staten Island. Neither the North Shore Light Rail to the Staten Island Ferry Terminal, nor the North Shore Bus Rapid Transit (BRT) to the Staten Island Ferry Terminal have come to fruition. Construction vehicles on Richmond Terrace during *River North's* 4+ years construction plan would increase congestion and interfere with plans for the MTA's North Shore Bus Rapid Transit pathway on Richmond Terrace. <http://onenyc.cityofnewyork.us/#main-content>

b. The *OneNYC* plan, cited in this section of the applicant's DEIS, points out, "Real estate speculation . . . has resulted in many New Yorkers questioning whether they can afford the neighborhoods they call home. . . the City is committed to a planning approach that gives communities a voice, values local knowledge, and ensures plans are guided by an equity imperative." <http://onenyc.cityofnewyork.us/initiatives/promote-place-based-community-planning-and-strategies/>

In June, 2021, the Staten Island Community Planning Board 1 voted to reject the *River North* project. Staten Island Borough President James Oddo's November 16, 2020 letter to the NYC Planning Commission in opposition to the project follows. The letter is co-signed by a bi-partisan group of the majority of elected Staten Island officials:

"Dear Chairperson Lago:

"We, the undersigned, collectively represent the 475,000 residents of the Borough of Staten Island, and we are writing to request that the Department of City Planning reject the Liberty Towers proposal in its entirety. Simply put, our constituency does not want this proposed out-of-character project, one that would so dramatically infringe upon their neighborhood's quality of life.

"For the last forty years, Islanders have been expressing concerns about mid- and high- density development projects that would trample the borough's unique residential character. City Planning has always assured Staten Island residents that the predominately low-density communities of the Borough would be protected and preserved. In 1985, to that end, City Planning began a series of downzoning applications to remove most R6 districts from Staten Island. The applications acknowledged the concerns of many communities and elected officials by removing higher-density districts from the Borough forever. The effort continued –

regardless of ongoing as-of-right proposals - until almost all the vacant R6 parcels in the Borough were rezoned.

“However, the latest iteration of the Borough Planning Office seems exceedingly more inclined to ignore the will of the people, and are now promoting the tallest structures ever considered for approval in the borough. The proposed R7-3 rezoning is unprecedented, and represents the first time in the history of our borough that a residential zone of this density has been considered. This particular portion of St. George is not the place for a maximum building height of 185’, which is more appropriate for Long Island City-type views and density. To add City Planning insult to Staten Island injury, the applicant is requesting an almost seventy percent increase in the permitted maximum building height.

“It appears that the density of the surviving R6 zoning designation, the outrageous maximum as-of-right height of the proposed R7-3 district, the *Special Hillside Preservation District*, and the assumed protections for those unique properties located in the St. George Special District, is not enough for City Planning to flinch. Additionally, we are once again presented with a voluminous environmental assessment whereby the study area is carefully manipulated so that the results so important to Staten Islanders simply do not matter.

“City agencies should be reviewing the merits of discretionary approvals based on their context within the existing community, as well as the overwhelming will of the stakeholders who live and work there. This should in no way be solely about the return on investment for the applicant. No, this is also about respecting the investments made over an extended period of time by the community, investments that have contributed to the quality of life at Staten Island’s front door. They have a right to preserve the character of their neighborhood and should not have to constantly be defending St. George from the latest agency proposals that go beyond the existing zoning standards. Their voices matter, too, do they not?

“We will respond in writing more specifically on the scope of work, but we take this opportunity to say universally and publicly: “Enough!”

“Enough of ignoring the wishes and opinions of people of Staten Island. Enough of enabling oversized proposals to navigate quickly through the process, while holding up smaller one-family applications for years. Enough of ignoring overcrowded schools in underserved communities with insufficient infrastructure. And finally, enough of disingenuously pretending that what Staten Islanders and their elected representatives say even matter, when the outcome is invariably predetermined.” Signed James Oddo, Staten Island Borough President and co-signed by New York State Senators Andrew Lanza and Diane Savino, City Council Minority Leader Steven Matteo, Councilmember Joseph Borelli, and New York State Assembly Members Michael Reilly, Michael Cusick, and Charles Fall. . .

<https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/river-north-final-scope-work.pdf>

The *OneNYC* plan, cited in the applicant’s DEIS, states as a goal to, “Promote place-based community planning and strategies . . . Reduce congestion and emissions.”

By continually “pushing the envelope”, the applicant disregards “placed-based” community planning and, as presented later in these comments, *River North* will produce adverse conditions in the site area and in the *Special St. George District*.

c. The proposed actions are not consistent with many public policies stated in *Housing New York, a Ten Year, Five Borough Plan* released 7 years ago, in May 2014 and cited within this purpose and need section. The plan states, “The City’s planning processes and land-use policies need to be revamped. . . Such a place-based approach must be guided by early and regular input from the communities themselves.” The *River North* plan does not enhance the St. George community’s “livability and character.” Community Planning Board #1 opposes the *River North* project, as do most of the elected officials on Staten Island.

The applicant’s DEIS refers to *Housing New York, a Ten Year, Five Borough Plan* (May, 2014) in this purpose and need section. This plan highlights the *Lighthouse Point* project for St. George: “Through site redevelopment and adaptive reuse, this project will transform the site to create a vibrant mixed-use and mixed-income waterfront community. . . The *Lighthouse Point* project will restore and repurpose the six historic structures on the site and will accommodate two new towers on the vacant parcels. This dynamic mixed-use project will ultimately create approximately 500,000 square feet of retail, residential, and hotel development. The redevelopment will also bring significant economic activity to the St. George area. The residential portion of the project will provide 109 units of new housing across a range of income levels, with at least 22 units (or 20 percent of the total) permanently affordable to individuals earning up to 60 percent of AMI.” <https://www1.nyc.gov/assets/hpd/downloads/pdfs/about/housing-new-york.pdf>

Years have passed. *Lighthouse Point* has yet to produce housing, whether ‘market rate’ or ‘affordable’. No retail and no hotel space have opened on this site. The site is scaffolded and barricaded at street level. No housing has appeared from any of the examples given in the DEIS submitted by the applicant, Richmond SI Owner LLC. There is a glut of commercial space at the *Empire Outlets*, and public open space has been diminished. The view of the harbor is obstructed at street level on Richmond Terrace along the wall of the incomplete *NY Wheel* parking garage. The construction obliterated the landscaped shoreline *Waterfront Esplanade* to the west of the *9/11 Memorial* which, itself, required hundreds of thousands of dollars to rehabilitate. [Ostapluk, Joseph, “Volunteers honor 9/11 memorial with Sunday cleanup”, *Staten Island Advance* , August 25, 2019 <https://www.silive.com/news/2019/08/volunteers-honor-911-memorial-with-Sunday-cleanup.html>]

The *Housing New York* plan, cited in the purpose and need section of applicant’s DEIS, states there will be a “New Vacant Land Tax: (to) disincentivize speculators from holding land off the market by taxing it at a higher rate until in-demand housing is built.” <https://www1.nyc.gov/assets/hpd/downloads/pdfs/about/housing-new-york-2-0.pdf>

How will re-zoning the applicant’s land ensure that the applicant, or any owner of vacant land will be required, not only to begin, but to complete any construction?

The applicant is a Limited Liability Company. The members of the Limited Liability Companies (LLC’s) that have invested in the developments in St. George have had certain financial protections. If their plans aren’t realized according to expectation, their personal assets are

shielded. The money that investors lose, i.e., capital losses on Staten Island, can be written off against taxes on their profits, i.e., capital gains made elsewhere. Investors in LLC's are safeguarded from the full economic impact of their erroneous ideas, such as construction projects that fail to thrive. They have "limited liability for the contractual obligations and other liabilities of the business." <https://dos.ny.gov/forming-limited-liability-company-new-york> But what about the people, taxpayers, who are left to pick up the pieces in the neighborhoods of broken promises?

Nagged by the many unfulfilled promises in St. George, a question arises that requires thought. Is it possible that, if the NYC Planning Commission approves the St. George zoning changes requested by the *River North* investors, investors can garner a substantial increase on investment in the re-sale value of the re-zoned land with its air rights, even if a single apartment building is never started, or if started, is left half completed to plague the neighborhood as an eyesore for years?

It is not as if there are no other buildable lots in St. George on which housing for people of any economic strata can be developed within the current zoning. For example, according to an April 23, 2021 article in the *Staten Island Advance*, a parcel of land is currently for sale in the *Special St. George District*: "Vacant property in St. George -- up for sale for \$12.5 million -- is being marketed with plans for a 20-story residential tower targeting middle-income families. The approximately 1-acre site is located in the *Special St. George District* in a commercial zone that allows buildings up to 20 stories high. While the site is an assemblage of several land parcels, the property is being marketed with the address of 124 Central Ave." [Popora, Tracey, "For sale: \$12.5M St. George site with plans for a 20-story residential building," *Staten Island Advance*, April 23, 2021. <https://www.silive.com/news/2021/04/for-sale-125m-st-george-site-with-plans-for-a-20-story-residential-building.html>]

And other developers in St. George have found it possible to envision residential buildings within the Zoning Resolution: ". . . according to the Realtor who just brokered a \$9.5 million sale of a 37,000-square-foot, L-shaped parking lot to international investors who plan to build a high-rise there. The parking lot at 315-325 St. Mark's Place, at the corner of Hyatt Street, . . . sold two weeks ago . . . It's going to be more than 15 stories high. This is going to be a residential high-end building. . .the high-rise could include between 140 to 180 residential units with lower-level commercial operations and parking. The property is located within the *Special St. George District* zoning area, and allows both commercial and residential development up to 20 stories." [Popora, Tracey, "One of Staten Island's tallest buildings to be built in St. George on \$9.5M lot, says real estate broker", January 23, 2015, *Staten Island Advance*. https://www.silive.com/northshore/2015/01/staten_islands_tallest_buildin.html]

But, has there been a single success story for large-scale residential development on Staten Island's North Shore? The *Housing New York* plan, cited in the applicant's DEIS, gives an example of possible housing and retail development in close-by Stapleton, "In neighborhoods such (as) . . . Stapleton in Staten Island. . . the City will work with local elected officials, residents, businesses, and community organizations, to make a series of targeted infrastructure investments to unlock the potential for thousands of new affordable housing units and accompanying retail, services, and community facilities." https://www1.nyc.gov/assets/housing/downloads/pdf/housing_plan.pdf

Despite the plans for Stapleton, the one large scale housing development that has been built, which includes “affordable” units, *URBY*, is behind in its targets. The infrastructure investments that have been made, have not unlocked the potential. Although all 20% of *URBY*’s “affordable” units allotted by the developer have been filled, it has been difficult to attract “market” rate renters.

Perhaps the true “market” rate rent for Staten Island’s new North Shore construction is the “affordable” rate.

The third building with an additional 321 apartments in the *URBY* project has yet to be constructed and the retail units have seen much turnover. “. . . the reason the high-end apartment complex didn’t attract as many off-Island renters is because of the borough’s long-standing lack of connectivity to the waterfront and Manhattan. . . Several businesses have upstarted and shuttered since *URBY* opened. . . The number of (retail) shutterings or concept changes is 11 [in four years] since the developments inception in 2016.” [Porpora, Tracey, “Urby developer: ‘It took longer to become economically stable.’” March 9, 2020 *Staten Island Advance*.
<https://www.silive.com/news/2020/03/urby-developer-it-took-longer-to-become-economically-stable.html>]

Perhaps the focus for development should be on the remediation of the decades long identified issue: transportation both around the island, and to and from the island. Lessening the commute time on the Island and to the other four boroughs, might attract people from elsewhere to all parts of the island.

Without transportation, the “If we build it, they will come” strategy has been anything but a resounding success.

d. The *North Shore 2030* plan released in 2011, cited in this purpose and need section of the applicant’s DEIS, states: “Open space is scarce compared to the rest of Staten Island, particularly in St. George . . . From this work and ongoing input from local stakeholders, elected officials, and partner City and State agencies, a series of priorities emerged, including: . . . The need for better transportation connections for all users . . . Protect and revitalize the North Shore’s historic mixed-use neighborhoods . . .

“St. George Recommendations: . . . Expanded retail and housing options on private sites, taking advantage of the existing *St. George Special District* zoning . . . Improved transportation connections to St. George through strengthened ferry and other transit connections.”

It is now 2021. Which of those recommendations of 10-year old *North Shore 2030* plan has been accomplished? Attempts in St. George at expanded retail and housing options were made, not on private land, but on public land administered by the NYC Economic Development Corporation, i.e., the *Empire Outlets* mall, *Lighthouse Point* and there have been no better transportation connections. And, the DEIS submitted by the applicant, Richmond SI Owner LLC, makes no mention of protecting the neighborhood. Rather, the applicant requests the amending the existing zoning that limits size and thus amending the *Special Hillside Preservation District* designation, that protects both the topography and the character of the neighborhood.

The *North Shore 2030* plan, cited in this purpose and need section of the applicant's DEIS, also states, "Through the public engagement process, community stakeholders focused on the four key assets that continue to define the study area. These assets . . . the area's distinctive neighborhoods and town centers, its historic streets, and the former North Shore Railroad right-of-way. The consensus was that building upon and leveraging these assets will help to unlock the North Shore's significant potential and will provide North Shore residents, businesses, and visitors with quality jobs, improved transportation connections, and needed services. . . North Shore residents face some of the worst commute times in the country. Forty-three percent spend over 45 minutes traveling to work, and a lack of sufficient options contributes to a low proportion (35 percent) of commuters using public transit west of St. George."

https://www1.nyc.gov/assets/planning/download/pdf/plans-studies/north-shore/north_shore2030.pdf

The *River North* project has been rejected by Staten Island Community Planning Board #1 and by most of Staten Island's elected officials, and its 4+ years construction will increase congestion and interfere with the route of the proposed North Shore Bus Rapid Transit along Richmond Terrace.

5. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, "4. The Project Area is across Richmond Terrace and Hamilton Avenue from the *Special St. George District*, a special district that encourages denser urban development and is largely within a C4-2 commercial zoning district (which has an R6 equivalent). DEIS, p. E-11.

a. This is a statement of neither purpose nor of need and the DEIS does not address the environmental effects of the zoning requests on the *Special St. George District*.

Currently, the *Special St. George District* zoning regulations, which restrict the maximum height of a building to 200 feet, are at odds with the applicant's project. *River North* projected Building 1 is 291 feet high according to some pages in the DEIS, and *River North* projected Building 2 is 265 feet high on some pages of the DEIS.

Not only are the 3 *River North* buildings taller than permitted in their current R6 zoning, two buildings are also taller than permitted by the current *Special St. George District* zoning. 128-35, Chapter 8 Special St. George District. <https://zr.planning.nyc.gov/article-xii/chapter-8>.

"The *Special St. George District* was adopted in 2008 and provided new zoning regulations that set forth the framework for private investment by allowing needed housing and commercial uses in tall, slender buildings, which maintain views to and from this unique hillside neighborhood."

https://www1.nyc.gov/assets/planning/download/pdf/plans-studies/north-shore/north_shore2030.pdf

For purposes of comparison, and to help visualize the allowable height in the *Special St. George District*, currently, the two tallest buildings in the area, and on all of Staten Island, are the two buildings of the *Castleton Park Apartments* at 165 and 185 St. Marks Place which are 20 stories each and on a lot size of 209,088 sq. ft., and were completed in 1976. The applicant is planning a 25 and a 26-story building on an area of land half the size.

The *River North* project area is currently zoned R6. The applicant's property was purchased in 2018 when its zoning designation, R6 and *Special Hillside Preservation District*, should have been known through due diligence.

The applicant's purpose is to construct buildings taller than is permissible on both the *River North* project land and to attach that land to a district which doesn't permit buildings as tall as those proposed by *River North*. To accomplish that goal, the applicant then wants to amend zoning of the *Special St. George District* to permit R7-3 zoning within it.

The applicant's proposed revisions to the Zoning Resolution for the *Special St. George District* can be read in the DEIS Appendix B, "Proposed Zoning Text Amendments" section 128-056, and others. <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/appendb-deis.pdf>

Both the *River North* project, and the zoning amendments that the applicant is seeking relative to the *Special St. George District*, run counter to the decades of work that has been done by NYC planning agencies to preserve the character of St. George and the quality of life of the residents of the neighborhood. [Somma-Hammel, Jan, "St. George: Then, Now, and What's Coming in the Future", April 11, 2017. *Staten Island Advance*. https://www.silive.com/seen/2017/04/st_george_then_now_and_whats_t.html]

The applicant's arguments in the DEIS section, Statement of Purpose and Need, do not present a substantial case to grant a zoning map change, zoning text amendments, and further permits, to build out of context buildings of 25 and 26 stories in height on property designated as *Special Hillside Preservation District* and R6 zoning. No pressing need to use this particularly unsuitable site for such buildings was demonstrated.

Comments on the River North DEIS section: Proposed Development

The DEIS submitted by the applicant, Richmond SI Owner LLC states, "Building 1 on Site A would be the largest of the proposed three buildings. . . The building would have 26 stories . . . Building 2 would be second largest building on Projected Development Site 1 and would be sited to the north of Building 1. . . The building would have 25 stories plus a bulkhead. . . Building 3 [11 stories] would be the smallest of the proposed buildings on Projected Development Site 1."

"The Applicant does not propose development on Projected Development Site 2, which the Applicant does not control."

1. In order to construct the buildings of a height and density not permitted by current zoning on Staten Island, the applicant seeks to circumvent the protections of the *Special Hillside Preservation District* designation and the R6 height restrictions that apply to the *River North* project, firstly, by applying to add the *River North* project site, which according to NYC Department of Finance records, includes the zoning lots of other owners, to the *Special St. George District*. Secondly, the applicant is seeking to change the height limitations and other restrictions that apply to the *River North* project by amending the zoning of the *Special St.*

George District to permit R7-3 zoning to which it seeks to attach the *River North's* lots. Thirdly, the applicant is seeking special permissions that circumvent even the applicant's requested rezoning of the *Special St. George District*. See DEIS Appendix B. "*Special St George District Text Amendment February 16, 2021 River North Special St. George District Text Amendment*".

2. The applicant's 3 lots are a tiny fraction of the area for which the applicant is pursuing these actions. Other than the obvious reason, i.e., the applicant wants to construct the most tall and dense buildings covering the most land area that can be envisioned for the project site, the applicant gives no plausible reason to permit R7-3 zoning in the entire *Special St. George District* and does not offer any evidence for the need to change the current zoning for the *Special St. George District* or to permit the attachment of the applicant's lots to the *Special St. George District*. The applicant is not even happy with the current zoning provisions of that district. See the zoning map at: <https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-maps/map21c.pdf>

An example of the zoning change wording that the applicant seeks to add to this section is, "In R7-3 Districts, the maximum base height [not building height] shall be 75 feet."

Currently, there is no R7-3 area in the *Special St. George District*, or on any part of the entire 59 square miles of Staten Island, and the current permissible height of a building base in the *Special St. George District* is just about half that, or 40 feet, and only if a tower, that is, a narrower structure is planned above it. 128-33 to 128-35 NYC Zoning Resolution, Chapter 8. <https://zr.planning.nyc.gov/article-xii/chapter-8>

No need has been demonstrated to change the *Special St. George District zoning*. The unmitigated adverse effects of the *River North* project are presented further in these comments.

3. There is a lack of clarity as to who is the actual developer of the *River North* land in question. The applicant, Richmond SI Owner LLC, registered with the NYS Department of State on August 6, 2018. For the lots that Richmond SI Owner LLC actually owns, the property's Transfer Tax document from Liberty Towers Realty to Richmond SI Owner, LLC, is dated 12/5/2018. <https://a836-acris.nyc.gov/CP/CoverPage/MainMenu> However, in the document *River North* "Final Scope of the Work", and in the news media some of the comments refer to another entity, Madison Realty Capital. <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/river-north-final-scope-work.pdf>

The following commenters, writing in support of the project, identify, not Richmond SI Owner LLC, but Madison Realty Capital as *River North's* developer: a representative of the New York Building Congress, the Executive Director of the *National Lighthouse Museum*, the secretary of the *Staten Island Downtown Alliance*, and the President and CEO of the *Staten Island Economic Development Corporation*. Madison Realty Capital's web address is: <https://www.madisonrealtycapital.com>

In 2018, the *River North* applicant, Richmond SI Owner LLC, listed in "c/o Madison Realty Capital" as its mailing address at 825 Third Avenue, 37th Floor, NY, NY 10022. The document is the NYC Department of Finance, NYC Real Property Transfer Tax. Date: December 5, 2018.

Document ID: 2019010900387001. https://a836-acris.nyc.gov/DS/DocumentSearch/DocumentDetail?doc_id=2019010900387001

A few months earlier in 2018, Madison Realty Capital was associated with the Richmond SI Owner LLC's lots. New York Department of Environmental Conservation website posts a document dated August 29, 2018 that associates some of the *River North's* property with Madison Realty Capital. The Environmental Site Assessment was "prepared for Madison Realty Capital . . . in conjunction with the sale or lease of the subject property."

<https://www.dec.ny.gov/data/DecDocs/C243045/Application.BCP.C243045.2018-08-29.Phase%20I%20Environmental%20Site%20Assessment%20Report-Environmental%20Business%20Consultants.pdf>

According to the August 29, 2018 Environmental Site Assessment Report prepared for Madison Realty Capital, it identified the lots as in "a hillside preservation area." One year later, according to Appendix C of this DEIS, the NYC Department of City Planning gave Madison Realty Capital confirmation of the limits of the land use. In *River North* DEIS [CEQR No. 20DCP140R] Appendix C Reasonable Worst Case Scenario, there is map labelled "Limited Right of Opportunity". The July 2019 map identifies most of Site A and Site B as either a "Steep Slope Area" or a "Steep Slope Buffer" or an "Area Not Suitable for Building".

The Map has the labels, "Limited as of Right Opportunity, 19 July 2019, Liberty Towers Madison Realty Capital DCP [Department of City Planning] Interdivisional [sic] Meeting". On the map is a box with the statement, "The provisions of the *Special Hillside Preservation District* considers [sic] Site A as a Tier II site and Site B as a Tier I site. Site A is not feasibly developable without authorizations and site B is not fully developable due to limited area for a building footprint."

<https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/appendc-deis.pdf>

Certainly, the outcome of the July 2019 meeting with NYC Department of City Planning, which is now reviewing this DEIS, would have made clear that a project the size of *River North* was not "feasible" on the property. <https://www1.nyc.gov/site/planning/applicants/applicant-portal/step2-begin-process.page>

The project was, however, pushed forward. It seems, that in order to overcome the negative findings of the NYC DCP interdivisional meeting, the zoning amendments, etc. that are in Appendix B of this DEIS, were filed a year and a half later. These are dated February 16, 2021.

Since 2018, Madison Realty Capital appears to have been invested in moving the *River North* project forward, despite being aware for several years that the project was not feasible as envisioned, and of being aware of community opposition to the project. The latest rejection, June 2021, is by Community Planning Board#1. The majority of elected officials on Staten Island had already gone on record opposing the project in November 2020. [Porpora, Tracey, "CB1 gives a thumbs down to 750-unit high-rise apartment complex in St. George", *Staten Island Advance*, June 10, 2021. <https://www.silive.com/news/2021/06/cb1-gives-a-thumbs-down-to-750-unit-high-rise-apartment-complex-in-st-george.html>]

a. The question arises: Why is the applicant so optimistic that the current NYC Planning Commission will eventually approve the *River North* project as described in its DEIS, with its "series of discretionary land use actions including a zoning map amendment, zoning text amendments, and a special permit (the "Proposed Actions") from the City Planning Commission

(CPC) to facilitate the development of a mixed-use project comprising residential and commercial uses, open space, and accessory parking (the “Proposed Development”) in the St. George neighborhood of Staten Island, Community District 1 (see Figure 1)” ? DEIS, p. E-1.

As prior members of the NYC Planning Commission concluded almost thirty years ago in 1992, “North Shore Staten Island Redevelopment should respect the site's topography and historic structures.” Department of City Planning NYC DCP 92-27.

http://www.deltacityofthefuture.nl/documents/NYC_comprehensive_waterfront_plan.pdf

b. `Would approving these actions, on Staten Island, create a precedent for re-zoning and development in the currently less dense neighborhoods in the boroughs of Manhattan, Brooklyn, and Queens? Perhaps along Willow Street in the *Brooklyn Heights Historic District* or perhaps on Elizabeth Street in the *Chinatown/Little Italy Historic District*?

4. The DEIS submitted by the applicant, Richmond SI Owner LLC does not explain why it is necessary to include other owners’ properties in its application for re-zoning. These include, but are not limited to, the *View*, 224 Richmond Terrace, property [Block 13, Lot 60], previously publicly associated with Madison Realty Capital, and Development Site #2 [Block 13, Lots 68, 71 and 73].

Further, the DEIS particularly states that the applicant has no control over another site, Development Site #2. The applicant would have no control over what is constructed on the property. It gives no reason to include Development Site #2 in the application. The DEIS does not present supporting evidence that the applicant speaks for the all the owners of the two project sites. DEIS, pp. E-12 – E-13.

Regarding applications which include more than one property owner, the *Special Hillside Preservation District* regulations state, “Notwithstanding the provisions of Section 78-06 (Ownership), a zoning lot having an average percent of slope of 10 percent or greater which is the subject of an application under this section may include adjacent properties in more than one ownership, provided that the application is filed jointly by the owners of all the properties included. Any subdivision of the tract before, during or after development shall be subject to the provisions of Section 78-51 (General Provisions)” 119-03. <https://zr.planning.nyc.gov/article-xi/chapter-9>

Regarding altering other lots in the *Special Hillside Preservation District*, would this stipulation of the *NYC Zoning Resolution* apply, “In the event that any zoning lot proposed for subdivision contains a development, enlargement or site alteration which has been undertaken contrary to the provisions of this chapter, the Commission shall not approve the subdivision until violations are removed from the zoning lot in accordance with the commission’s requirements under Section 119-40 (Compliance)? 119-04 Special Hillside Preservation District.

<https://zr.planning.nyc.gov/article-xi/chapter-9>

5. In this section of the DEIS submitted by the applicant, Richmond SI Owner LLC, states, “Each building would contain retail uses below the second floor.” DEIS, p. E-11.

Pre-pandemic, there was a glut of unused commercial space as exemplified by the pre-pandemic empty space in the *Empire Outlets* mall on Richmond Terrace at the Staten Island Ferry Terminal/St. George, and the pre-pandemic shrouded windows of the ground floor commercial space of the *View*, 224 Richmond Terrace.

Comments on the DEIS section: Analysis (Build) Year and Construction.

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “The analysis year established for this project is 2025, the year when new development generated by the Proposed Actions would be complete and fully occupied. The analysis year assumes the Proposed Actions would be adopted in 2021, and construction would commence soon after and last approximately three years.” DEIS, p. E-11.

“Phase 1, which includes the entirety of Development Site 1, would be fully constructed 30 months after construction commences. Phase 2, which would involve construction of Projected Development Site 2, would be constructed in 15 months; including a six-month period of no construction activities between Phases 1 and 2, the cumulative construction period would be 51 months.

Given the length of the construction project due to its oversized buildings, “Significant adverse construction traffic impacts would occur at seven intersection approaches/lane groups, and significant adverse construction noise impacts would occur at 20 locations.” DEIS, p. E-29.

The DEIS submitted by the applicant, Richmond SI Owner, LLC, further describes the neighborhood disruption caused by the 4+ years *River North* construction project:

“Staging, receiving, and other secondary construction activities would occur on Projected Development Site 1 and in the temporary sidewalk closures along Richmond Terrace, Stuyvesant Place, and Hamilton Avenue along the site’s frontage.

“Trucks would egress the site at the intersection of Richmond Terrace and Stuyvesant Place (Staging Area 2), where flaggers would assist truck traffic onto Richmond Terrace.

“Trucks and smaller vehicles may occasionally egress to Stuyvesant Place or Hamilton Avenue and use local streets to return to Richmond Terrace.

“Construction access would occur on all four sides of Buildings 1 and 2, and on three sides of Building 3. The construction access to multiple sides of the buildings would allow for more efficient construction than buildings of similar size with more limited construction access.

“Traffic lanes and sidewalks would be closed or protected during the construction period at varying lengths of time.

“Depending on the stage of construction, truck movements would generally occur between 6:00 AM and 3:00 PM . . . Due to construction activities, there would be temporary closing of on-street parking and sidewalks, but pedestrian circulation and access would be maintained through the use of a temporary sidewalk.

During construction of Projected Development Site 1, the sidewalks and 8-foot-wide on-street parking lanes at the site’s frontage along Richmond Terrace, Stuyvesant Place and Hamilton Avenue would be closed to accommodate construction activities.” DEIS, pp. 11-9 - 11-10.

1. The lengthy construction period is a result of constructing too much and too many buildings on the 2 acres of steeply sloped hillside, currently protected by the *Special Hillside Preservation District* designation. It could be avoided by building within the property’s current zoning regulations.

2. There is no guarantee for this optimistic 4+ year time-frame. Re-zoning was done for the *NY Wheel*, its parking garage, the *Empire Outlets* mall, *Lighthouse Point*, and *URBY*. However, all of these projects, which were to have been completed by now, and some of which were supported by the NYC Economic Development Corporation, have either stalled completely or are unfinished, more than five years after their start dates.

3. A building within the current application took over a decade to complete. The first developer of the *View*, 224 Richmond Terrace, which property is included in the applicant’s DEIS, and which is within the area for which the request is made for re-zoning and with it, removal of the *Special Hillside Preservation Designation*, went bankrupt. Madison Realty Capital purchased its debt in 2012. As described in the *Staten Island Advance*, “. . .it was slated for 40 luxury condominiums, the kind typically found on the other side of the Verrazano-Narrows and the Goethals bridges, but instead it sits empty, about 95 percent complete, marked by graffiti, broken windows and rust slowly settling in . . . [the original developer] was the face behind a number of high-profile projects across the Island, but rarely appeared in person when his ambitious proposals went before the community. ‘I’m not emotionally attached to Staten Island,’ he told the *Advance* in 2008, the only time he agreed to speak to the paper. ‘I just saw an opportunity to develop buildings here. It’s a business opportunity.’ . . . And loans were also purchased in July by a still unidentified buyer for *Liberty Towers*, where [the bankrupt owner] proposed a 16-story, 164-unit condominium on Stuyvesant Place in St George.” [Slepian, Stephanie, “‘Zombie’ properties on Staten Island get a life”, *Staten Island Advance*, February 2, 2012. https://www.silive.com/news/2012/02/zombie_properties_on_staten_is.html]

Comments on the DEIS section:
Reasonable Worst Case Development Scenario (RWCDs)

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “In addition to the Applicant’s site (Projected Development Site 1), there would be one projected development site that is not Applicant-controlled, Projected Development Site 2. Because the Proposed Actions would significantly increase the permissible FAR with the mandatory provision of affordable housing on these sites, and remove provisions of the *Special Hillside Preservation District*, the

Proposed Actions could facilitate new development on Projected Development Site 2. The RWCDs memorandum for this project assumed Projected Development Site 2 would be developed as a mixed use building with an FAR of 6.0 (the maximum FAR that would be permitted) in the With-Action Condition). Being a site not controlled by the Applicant, the With-Action Condition established in the RWCDs for Projected Development Site 2 does not reflect the Applicant's proposed plans." DEIS, pp. E-12 – E-13.

1. It is unclear why the DEIS submitted by the applicant, Richmond SI Owner LLC would refer to the developer of a site, of which it is not the owner and which is not controlled by the applicant, and is not zoned for an 18-story building which the applicant states is proposed for the site. Currently this site consists of two lots with a home on each on them and one vacant lot.

2. The applicant submits a reasonable worst case RWCDs scenario for it, "Projected Development Site 2 is not controlled by the Applicant . . . The RWCDs established that the building would have a 65-foot-tall podium along the entirety of the Richmond Terrace frontage. Above the podium, the tower component would be set back from the side lot lines and 15 feet from Richmond Terrace before rising to the 18th floor and to a roof height of 185 feet. The building would be 205 feet tall including a 20-foot-tall bulkhead." DEIS, p. 1-9.

"The *Special Hillside Preservation District* regulations state, "Notwithstanding the provisions of Section 78-06 (Ownership), a zoning lot having an average percent of slope of 10 percent or greater which is the subject of an application under this section may include adjacent properties in more than one ownership, provided that the application is filed jointly by the owners of all the properties included. Any subdivision of the tract before, during or after development shall be subject to the provisions of Section 78-51 (General Provisions)" 119-03.

<https://www1.nyc.gov/assets/planning/download/pdf/about/cpc/870002.pdf>

a. Is this a joint application? Will the applicant be asked to clarify his intentions for and relationship to Projected Development Site 2?

b. Does the RWCDs for Projected Development Site 2 reflect compliance with the *Special Hillside Preservation District* stipulations that limit the height of a building?

3. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, "In the No-Action Condition, the Site A portion of Projected Development Site 1 would remain vacant because provisions of the *Special Hillside Preservation District* that protect steep slope and steep slope buffers. . ." DEIS, p. E-13.

This is one of only three times in the entire document that the DEIS submitted by the applicant, acknowledges a "steep slope" which the "*Special Hillside Preservation District*" was created to protect. There may be elevation markings on a map in the DEIS Appendix A but the elevations are not clearly discernable when viewed online.

4. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, "The Site B portion of Projected Development Site 1 would be developed . . . the building would have a roof height of

136 feet. Including a 30-foot-tall bulkhead, the building would be 166 feet tall. DEIS p. E-13
<https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/river-north-final-scope-work.pdf>

In this Worst Case Scenario will the land continue to be zoned R6, *Special Hillside Preservation District*?

The regulations stipulate, “For any development or enlargement the maximum height of a building or other structure or portion thereof shall be than which is shown in Table II . . . Zoning District R6, Maximum Height 70 feet.” 119-212 Special Hillside Preservation District.

Wouldn't current lot coverage, floor area and height regulations apply?

Would the building, as described above, be in compliance with the zoning in the no-change scenario?

Would this NYC Zoning Resolution stipulation apply: “No permanent Certificate of Occupancy shall be granted unless an inspection report verifying that the requirements of Section 119-20 have been met is filed by a registered landscape architect, a registered architect, a licensed surveyor or professional engineer with the Department of Buildings. 119-23 Special Hillside Preservation District. <https://zr.planning.nyc.gov/article-xi/chapter-9>

4. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “Independent of the Proposed Actions, the Applicant would acquire Tentative Lot 95 (the area within 185 feet of Stuyvesant Place). This tentative lot would not be incorporated into Sites A and B because it is needed for the Castleton [Park Apartments] lot's required open space ratio, and a non-compliance would occur if subdivided from this zoning lot under existing zoning.” DEIS, p. E-13.

Tentative Lot 95, is currently part of Block 13, Lot 8.

When the two buildings that comprise the *Castleton Park Apartments* were constructed, was a portion of land extending to Richmond Terrace between River North Site A and River North Site B specified to be kept as open land?

Can a parcel of land be simultaneously claimed as open space by two different housing developments?

Would this stipulation of the Zoning Resolution apply: “In any subdivision of a large-scale residential development for which such modifications were granted, covenants running with the land which shall permit of public or private enforcement, reflecting the terms, conditions and limitations of the large-scale residential development plan, as approved, shall be incorporated in the deed to each parcel conveyed.” 78-51. <https://zr.planning.nyc.gov/article-vii/chapter-8#78-51>

Comments on the River North DEIS section: Probable Impacts of the Proposed Actions

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “The Proposed Actions would not result in significant adverse land use, zoning, or public policy impacts. The Proposed Actions would not adversely affect surrounding land uses, or generate new land uses that would be incompatible with existing land uses, zoning, or public policies in the Study Area. In addition, the Proposed Actions would create land uses or structures that would neither be incompatible with the underlying zoning, nor conflict with public policies applicable to the Study Area.” DEIS, p. E-16.

1. The DEIS submitted by the applicant, Richmond SI Owner LLC, includes required *CEQR* topics, such as the following, but only in so far as they pertain to the *River North* project, NOT to the *Special St. George District* for which zoning text amendments are requested:

Land Use, Zoning, Public Policy, Socioeconomic Conditions, Direct Residential Displacement, Business Displacement, Community Facilities and Services, Public Schools, Child Care Centers, Libraries, Open Space, Shadows, Historical and Cultural Resources, Archeological Resources, Architectural Resources, Urban and Visual Resources, Hazardous Materials, Water and Sewer Infrastructure, Traffic, Transit, Parking, Air Quality, Noise, Public Health, Neighborhood Character.

As the zoning map and zoning text amendments specifically impact the Special St. George District, is the applicant’s DEIS required include the area in its DEIS?

2. Contrary to the statement on DEIS, p. E-16, submitted by the applicant, the proposed actions would result in significant adverse land use, zoning, and public policy. Not only would they eat away at the *Special Hillside Preservation District*, they would ignore the authentic wishes of the community to reject the *River North* project, as voiced by the bi-partisan co-signed letter of their elected officials to the NYC Planning Commission in November, 2020 and by the rejection of the *River North* Project by Staten Island Community Planning Board #1 in June, 2021.

3. The proposed actions are in conflict with decades of R6 and *Special Hillside Preservation District* zoning. These zoning regulations were applied over the course of decades with the support of both the majority of the community population and of their elected and appointed leaders. The applicant has presented no pressing case for change.

4. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “The Proposed Actions also do not have the potential to conflict with public policies, and would support the goals of *OneNYC 2050*, *Housing New York 2.0*, *North Shore 2030*, *North Shore Bus Rapid Transit*, or *FRESH*.” DEIS, p. E-16.

As stated in previous comments, the applicant’s proposed actions DO conflict with some goals of *Housing New York* and *North Shore 2030*.

The proposed actions, with their 4+ years construction time frame and increased traffic on Richmond Terrace, also conflict with North Shore Bus Rapid Transit (BRT). Before the *Empire Outlets* mall was built and thus blocked the BRT's proposed ground level terminus, its entire route would have been along the old railway line right of way (under the control of the New York City Economic Development Corporation), ending at the ferry terminal, and thus, would have avoided using local streets. <https://new.mta.info/document/10486>

The new transit plan, re-designed because of the *Empire Outlets*' location, now requires the BRT vehicles to leave the shore level railway right-of-way and ascend onto Richmond Terrace at Nicholas Street where the *View* is located. The BRT vehicles will then travel with fire trucks, police vehicles, ambulances, school buses, bicycles, commuter automobile traffic to the Staten Island Ferry Terminal, commercial traffic, and the vehicles of the people who work in, or have business in, the public buildings, such as, schools, the NYC Health Department, Staten Island Borough Hall, Surrogate Court, Family Court, and the 120th Police Precinct, and share the ramps at the ferry terminal with the existing, more than 20 bus routes. [Bascome, Eric, "7 years later: MTA provides update on North Shore Bus Rapid Transit, potential light rail", *Staten Island Advance*, May 9, 2019. <https://www.silive.com/news/2019/05/mta-updates-study-on-north-shore-bus-rapid-transit-potential-light-rail.html>.]

To accommodate the BRT vehicles, approximately 200 street parking places will be eliminated, as will the NYC Department of Transportation's "recently installed dedicated bike lane," paid for by taxpayer dollars. [Shapiro, Rachel, "A plan to improve harrowing ride for cyclists on North Shore", *Staten Island Advance*, August 31, 2017. https://www.silive.com/news/2017/08/biking_in_st_george_can_be_har.html]

The DEIS submitted by the applicant, Richmond SI Owner, LLC, describes how the 4+ years of *River North* construction would impinge on Richmond Terrace and the surrounding roads:

"Staging, receiving, and other secondary construction activities would occur on Projected Development Site 1 and in the temporary sidewalk closures along Richmond Terrace, Stuyvesant Place, and Hamilton Avenue along the site's frontage.

"Staging Area 1 would be located at the corner of Stuyvesant Place and Hamilton Avenue.

"Staging Area 2 would be in the vicinity of the intersection of Stuyvesant Place and Richmond Terrace, between Buildings 1 and 2. Staging Area 3 would be between Buildings 2 and 3.

"Trucks would egress the site at the intersection of Richmond Terrace and Stuyvesant Place (Staging Area 2), where flaggers would assist truck traffic onto Richmond Terrace.

"Trucks and smaller vehicles may occasionally egress to Stuyvesant Place or Hamilton Avenue and use local streets to return to Richmond Terrace.

"Construction access would occur on all four sides of Buildings 1 and 2, and on three sides of Building 3. The construction access to multiple sides of the buildings would allow for more efficient construction than buildings of similar size with more limited construction access.

“Traffic lanes and sidewalks would be closed or protected during the construction period at varying lengths of time.

“Depending on the stage of construction, truck movements would generally occur between 6:00 AM and 3:00 PM . . . Due to construction activities, there would be temporary closing of on-street parking and sidewalks, but pedestrian circulation and access would be maintained through the use of a temporary sidewalk.

“During construction of Projected Development Site 1, the sidewalks and 8-foot-wide on-street parking lanes at the site’s frontage along Richmond Terrace, Stuyvesant Place and Hamilton Avenue would be closed to accommodate construction activities.” DEIS, pp. 11-9 - 11-10.

Is there an estimate of the increased number of cement trucks and steel girder transports that will be required for this over-sized construction project and that will travel along Richmond Terrace during the 4+ years of construction?

What will be the effect of numerous heavy construction vehicles on the local road surfaces?

Comments on River North DEIS section Indirect Residential Displacement

Should the population Study Area to determine the adverse effects of the *River North* project on the St. George area be taken with more than a grain of salt?

The shortcomings of the *River North* Study Area are stated in the applicant’s DEIS as: “Being on a peninsula near the northeastern edge of Staten Island, the area within 0.5-miles of the Project Area is approximately 50 percent waterbodies. The Study Area established by CEQR methodologies therefore reflects a population density and population less than other inland areas of the St. George neighborhood . . .” DEIS p. E-18 and DEIS p. 2-21.

1. Looking at any map of Staten Island, the Study Area doesn’t seem to meet a 5th grade Geography teacher’s definition of a readily identifiable peninsula, i.e., a body of land surrounded on three sides by water, like Florida, or Italy, or Baja. A curve or bend in the shoreline does not equate to the popularly acceptable image of a peninsula. Staten Island is fairly diamond shaped. Using this DEIS standard, many Staten Island shoreline areas could be called peninsulas.

What do the professionals at NYC DCP, think of this Study Area?

a. The *CEQR TECHNICAL MANUAL NOVEMBER 2020 EDITION* Glossary defines as the “Study area: The geographic area likely to be affected by the proposed action for a given technical area, or the area in which impacts of that type could occur. This is the area subject to assessment for that technical area.” <https://www1.nyc.gov/site/oec/environmental-quality-review/ceqr-glossary.page>

The Study Area does not address the *Special St. George District* for which zoning text amendments are requested.

b. The *CEQR* entry on *p. 4-2* seems to imply that “bodies of water” do not have to be included in the Study Area: “The study area does not have to be regular in shape. Such geographical and physical features as bodies of water, significant changes in topography, wide roads, and railroad easements often define neighborhood boundaries, and therefore, can be the appropriate delineation of the study area. Due to the specific characteristics of certain projects and the potential for geographically dispersed effects, even larger study areas may sometimes be appropriate.” https://www1.nyc.gov/assets/oec/technical-manual/04_Land_Use_Zoning_and_Public_Policy_2020.pdf

Has the applicant’s Study Area been appropriately defined?

2. The shortcomings of the River North study area with “its approximately 50% water bodies”, and thus decreased population density, casts doubt on the DEIS’s analyses and conclusions, “. . . The Proposed Actions would expand the Study Area’s permanently rent-protected housing supply by approximately 270 Dus, which is more than 10 percent of the Study Area’s existing protected housing supply.”

The applicant’s DEIS Study Area already includes 2,655 rent protected dwelling units. An *NYU Furman Center* report “Profile of Rent-Stabilized Units and Tenants in New York City”, listed the total number of Rent-Stabilized/Controlled Units on Staten Island as 8,461 in 2011, not including apartments in public housing.

https://furmancenter.org/files/FurmanCenter_FactBrief_RentStabilization_June2014.pdf

The applicant’s St. George Study Area with “50% waterbodies” already includes roughly 25% of all the rent stabilized apartments on the entire 59 square miles of Staten Island. Much of the rent-protected housing on Staten Island is already in St. George.

If a more appropriate Study Area had been used, would the conclusions of the DEIS been the same?

Comments on River North DEIS section Probable Impact of Proposed Project to Public Schools

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “With the Proposed Actions, the public schools’ utilization rate would operate at less than 100 percent, and the utilization rate would not increase by more than five percent for either elementary or intermediate public schools.” DEIS, pp. E-18 – E-19.

1. Other neighborhood re-zonings have produced effects on school overcrowding contrary to their Environmental Impact Statements:

“The (Long Island City rezoned in 2001) FEIS estimated that an additional 99 school seats would be needed by 2010; by 2010, the zoning changes had brought 240 new students to the

neighborhood, and just eight years later, more than 3,200 students have been added. Seven out of nine local elementary schools are now overcrowded, with one operating at more than 200 percent capacity.” <https://www.mas.org/news/a-tale-of-two-rezonings-ceqr/>

“The (Downtown Brooklyn rezoned in 2004) FEIS estimated that an additional 446 school seats would be needed by 2013; by 2013, the zoning changes had brought 1,560 new students to the neighborhood, and just five years later, nearly 4,400 students have been added. Seven out of thirteen local elementary schools are now overcrowded.” <https://www.mas.org/news/a-tale-of-two-rezonings-ceqr/>

2. Additionally, the DEIS submitted by the applicant, Richmond SI Owner LLC, does not address the current overcrowding in the local public high school.

Curtis High School, is up the hill from the proposed *River North* site on a plot of land where Hamilton Avenue, and St. Marks Place converge, and Nicholas Street ends. It is 28.6% over capacity. Based on audited registers on 10/31/2019, there were 2,476 students in Curtis High School, 550 students over its capacity of 1,926.

https://dnnhh5cc1.blob.core.windows.net/portals/0/Capital_Plan/Utilization_Reports/Blue%20Book%20City%20Council%20Staten%20Island2019-2020.pdf?sr=b&si=DNNFileManagerPolicy&sig=2Iri%2BINvbKgILNwEuwUyVB59Zn0suU%2BqQaTMOYyPzEw%3D

The local high school is already at 128.6% of capacity.

If the DEIS had included the *Special St. George District* impacted by the proposed zoning text amendments, would the conclusion regarding school capacity have been the same considering the several new high-rise buildings proposed within that district?

Comments on the River North DEIS section: Open Space

1. The population Study Area to determine the adverse effects of the *River North* project on the open space for the neighborhood’s people is questionable. The applicant’s DEIS Study Area used an area containing 47.5% water bodies which therefore reduces the population density, raising some question on the accuracy of the Open Space Ratio that it presents: “Census tracts with at least 50 percent of their areas within the 0.5-mile boundary were included in the open space study area. Due to the Project Area’s proximity to the Upper New York Bay and Kill Van Kull, 47.5 percent of the area within the 0.5-mile buffer around the Project Area is within these water bodies.” DEIS, pp. 3-3 – p. 3-4.

2. Even using a Study Area with 47.5% water bodies, thus reducing the population density of the Study Area and possibly understating its dearth of open space, the DEIS submitted by the applicant, Richmond SI Owner LLC, admits that *River North* project would adversely affect the people living in its Study Area:

a. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “In the No-Action condition, the Study Area’s OSR of 0.37 would be well below the City’s planning goal of 2.0 acres of active open space per 1,000 residents. Relative to the No-Action Condition, the With-Action Condition’s active OSR would be further reduced from 0.37 to 0.33 acres per 1,000 residents.” DEIS, p. 3-14.

“The Study Area currently has an overall OSR of 1.24 acres per 1,000 residents, which is below the citywide median community district OSR.” DEIS, pp. 3-1 – 3-2.

b. “The With-Action Condition would result in a Study Area decrease in the total OSR (Open Space Ratio of space to people) of over 10 percent, including active and passive OSRs. The active OSR would decrease by 12.1 percent and the passive OSR would decrease by 10.75 percent, resulting in a total OSR decrease of 11.15 percent in the Study Area compared to the No-Action Condition . . . The Proposed Actions would not introduce new publicly-accessible active open space to partially offset the reduction in active open space per 1,000 residents. Therefore, the Proposed Actions would result in a significant adverse open space impact due to indirect effects (increased user population).” DEIS, p. 3-2.

3. The applicant’s DEIS makes reference to *North Shore 2030* which states: “Open space is scarce compared to the rest of Staten Island, particularly in St. George. . . From this work and ongoing input from local stakeholders, elected officials, and partner City and State agencies, a series of priorities emerged, including: . . . Improved views, parks, and pedestrian paths along the waterfront . . . Protect and revitalize the North Shore’s historic mixed-use neighborhoods . . .” https://www1.nyc.gov/assets/planning/download/pdf/plans-studies/north-shore/north_shore2030.pdf

a. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “. . . opportunities to fully mitigate the significant adverse open space impact within the Study Area are very limited. As a consequence, the Proposed Actions’ significant adverse open space impact may not be completely eliminated and, as a result, an unavoidable significant adverse open space impact would occur.” DEIS, pp. E-32 - E-33.

b. The applicant seeks a zoning amendment that reduces the requirement for developers of projects such as *River North* to provide a certain amount of open space. The changes it seeks states, “and in R7-3 Districts, the underlying #open space ratio# provisions shall not apply. In lieu thereof, the maximum permitted #lot coverage# for a #residential building#, or portion thereof, shall be 70 percent for an #interior# or #through lot# and 100 percent for a #corner lot#.” DEIS, Appendix B, p. 5.

R7-3 . . . Districts may be mapped only as specified in this paragraph. Such districts may be mapped within the waterfront area and in the Special Mixed Use Districts. In addition, R7-3 Districts may be mapped in the Special Long Island City Mixed Use District. . .

<https://zr.planning.nyc.gov/article-ii/chapter-1#21-15>

Should the Study Area have included the *Special St. George District*?

4. There is less possibility to mitigate the dearth of open space in St. George since the start of the *NY Wheel* project. The *NY Wheel* and its garage site were situated over open air parking fields and have eliminated any alternative use as open space such as that of *Brooklyn Bridge Park*.

The applicant's DEIS Appendix D includes a "PHASE I. ENVIRONMENTAL SITE ASSESSMENT REPORT, August 29, 2018". It contains many photographs which illustrate both the surrounding neighborhood of the projected River North site, and the effects of the parking garage. <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/appendd-deis.pdf>.

5. The issue of open space on Staten Island's North Shore hillsides has been addressed in several alternative ways as well, without constructing buildings and covering the land with concrete. For example:

a. In the past the City has acquired privately held land on Staten Island to make open space. It acquired *Goodhue Woods*, and *Jones Woods*: ". . .the city may [has] now purchase the Children's Aid Society property, which has a price tag of about \$33 million. The "North Shore Greenbelt" begins on Cottages Hill and extends through Jones' Woods, Goodhue Woods, Alison's Pond Park and Snug Harbor." [Platt, Tevah, "Historic vote for City Council tops year's news," *Staten Island Advance*, December 31, 2009. https://www.silive.com/northshore/2009/12/historic_vote_for_city_council.html]

b. A non-governmental agency, a not-for-profit organization, was created to rescue an area at the bottom of Gryme's Hill, above Van Duzer Street. It acquired the hilly plot which is now known as the *Serpentine Art & Nature Commons*. "In the late 1960's several speculators bought the steepest part of the hill with a plan for development but concerned neighbors successfully sued to stop them. Unfortunately the owners leased the land to a contractor who scraped off the topsoil. Before a court order stopped him, he left three acres of the hillside looking like a lunar landscape. Ownership of 11 ½ acres of the hillside was assumed by the Trust for Public Land (TPL). They encouraged concerned neighbors to form SANC [*Serpentine Art & Nature Commons*] to maintain and improve the land as a nature preserve open to the community. SANC's first tasks were to clean up our wooded lands and begin the long process of rebuilding our denuded land. We removed trash, removed almost 100 abandoned cars, and installed fencing to prevent further dumping. . ." <http://www.preserve.org/serpentine/serpentine.htm>

North Shore 2030, states: "Open space is scarce compared to the rest of Staten Island, particularly in St. George."

The applicant's statement of purpose and need does not justify the elimination of even more open space with the approval by the NYC Planning Commission of the applicant's request for "a series of discretionary land use actions including a zoning map amendment, zoning text amendments, and a special permit (the "Proposed Actions") from the City Planning Commission (CPC)." DEIS, p. E-1.

The River North project's outcomes do not outweigh the negative impact of further reduced open space on the health of the people in the surrounding area.

Comments on the River North DEIS section: Historical and Cultural Resources

“Set on a cluster of steep hills, St. George is part of a wide swath of older homes on Staten Island's North Shore. There are 78 structures with landmark status in an officially designated St. George Historic District, and the mix of styles in the town as a whole is encyclopedic in its variety.” Wilson, Claire, “If You're Thinking of Living In/St. George, Staten Island; Hills and Harbor and a Variety of Housing, *The New York Times*, Oct. 13, 2002. <https://www.nytimes.com/2002/10/13/realestate/if-you-re-thinking-living-st-george-staten-island-hills-harbor-variety-housing.html?searchResultPosition=6>

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “The Proposed Actions would not result in a significant adverse historic and cultural resources impact.” DEIS, p. E-21.

Perhaps due to the configuration of the *River North* Study Area with almost 50% water bodies, the applicant's DEIS omits any mention in this section of the NYC landmarked *St. George Historic District*. The *River North* project is out of character to the surrounding neighborhood and to the *St. George Historic District* which includes a property at 178 Richmond Terrace across Nicholas Street from the lots that the applicant is requesting rezoning to R7 and variances to the *Special Hillside Preservation District* designation. [Walsh, Kevin *Forgotten New York*, “St. George/Fort Hill Staten Island”, February 8, 2009. <https://forgotten-ny.com/2009/02/st-georgefort-hill-staten-island/>]

“The architecture of the district reflecting several distinct eras of suburban development on Staten Island, the curving streetscapes, the distinctive topography, and the terraced landscape all work together to give the area its special character.” <http://s-media.nyc.gov/agencies/lpc/lp/1883.pdf>.

As the DEIS submitted by the applicant, Richmond SI Owner LLC, states, Richmond Terrace is lined with landmarked buildings, among them many building designed by Carrière & Hastings. These included: Staten Island Borough Hall, <http://s-media.nyc.gov/agencies/lpc/lp/1207.pdf>, the Richmond County Courthouse, <http://s-media.nyc.gov/agencies/lpc/lp/1206.pdf>, the 120th Police Precinct <http://s-media.nyc.gov/agencies/lpc/lp/2058.pdf> and the Staten Island Family Courthouse. <http://s-media.nyc.gov/agencies/lpc/lp/2057.pdf>.

“Among the major French-inspired works designed by Carrière & Hastings are the Henry T. Sloane residence (1894-1896) at 9 East 72nd Street, the Henry Hammond residence (1902-1903) at 9 East 91st Street, the arch-and colonnade approach to the Manhattan Bridge (1912-1915), and the Frick Collection (1913-1914) at 1 East 70th Street . . .” <http://s-media.nyc.gov/agencies/lpc/lp/1207.pdf>

Up a steep hill where Hamilton Avenue and Nicholas Street intersect St. Marks Place, the landmarked Curtis High School stands. <http://s-media.nyc.gov/agencies/lpc/lp/1214.pdf>.

Because it was not included in the applicant's Study Area, there is no mention of the impact of the *River North* project on the St. George Historic District in this DEIS.

As prior members of the NYC Planning Commission concluded almost thirty years ago in 1992, “North Shore Staten Island Redevelopment should respect the site's topography and historic

structures.” *New York City Comprehensive Waterfront Plan; Reclaiming the City’s edge*.
Department of City Planning NYC DCP 92-27.
http://www.deltacityofthefuture.nl/documents/NYC_comprehensive_waterfront_plan.pdf

Comments to the River North DEIS section: Transit

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “However, the maximum peak hour subway/rail and bus trip generation due to construction of the Proposed Project are below the CEQR threshold for conducting detailed analyses of transit conditions. Therefore, the Proposed Actions would not result in potentially significant adverse transit impacts during construction.” DEIS, p. E-30.

1. While the construction probably will not result in greater need for bus transportation in the *River North* project area, existing bus routes will be impacted. The S40, S90, S44, and S94 travel along Richmond Terrace past the proposed construction site. The S40 has a bus stop at the corner of Nicholas Street and Richmond Terrace. The S52 has a stop at Hamilton Avenue at St. Marks Place which serves Curtis High School which has approximately 2,500 students and. How will the construction period of 4+ years affect the buses that travel along roads near the construction site.

2. How will the North Shore Bus Rapid Transit system, now slated to exit onto Richmond Terrace at Nicholas Street past the proposed construction site be affected by the 4+ years construction plan?

Comments on the River North DEIS section: Traffic

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “In total, construction of the Proposed Project could result in eight potentially significant adverse traffic impacts during either construction peak hour at the seven intersection approaches/lane groups in the study area.” DEIS, p. E-30.

1. To the applicant’s study, shouldn’t now be added the traffic to and from the *NYC Ferry*, and the vehicular traffic of the *Northshore Bus Rapid Transit* system? Its vehicles will now exit onto Richmond Terrace, passing in front of the applicant’s lots and traveling past Wall Street where the *NYC Ferry* is now scheduled to dock beyond the *Richmond County Bank Ballpark*. [Kashiwagi, Sydney, “Staten Island fast ferry location chosen; service expected to start this year”, *Staten Island Advance*, January 27, 2020. <https://www.silive.com/news/2020/01/staten-island-fast-ferry-location-chosen-service-expected-to-start-this-year.html>]

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “The potentially significant adverse traffic impacts at ten (10) out of the twenty-four (24) impacted intersection approaches/lane groups (combined for all peak hours) could be mitigated with readily implementable traffic engineering measures, including the modification of traffic signal timings and the installation of All-Way STOP-Control (AWSC).”

2. Research has shown that the mitigation proposed by the applicant not effective.

There are already traffic lights at Richmond Terrace at Jersey Street, at Westervelt Avenue, and at Wall Street; and at Victory Boulevard at Bay Street. There is a four way stop at Hamilton Avenue and St. Mark's Place. Traffic timing signals cannot reduce the volume of traffic on streets with limited capacity.

a. As one study reports, "Recently, regional traffic signal synchronization has become one of the main research directions in the field of urban traffic signal control, and some regional traffic signal control systems have been developed, such as TRANSYT, SCATS, and SCOOT. Unfortunately, when applied in the saturated (high-density grid road network) HGRN, the performance of these systems has not been satisfactory. When the network is saturated, there is no extra time and space to optimize the traffic signals. Therefore, the regional signal control systems cannot optimize the signal control parameters at the intersections, and the control systems may operate as fixed-timed control systems. In this situation, the traffic system is more fragile and prone to traffic congestion." Xiaojian Hu, Jian Lu, Wei Wang, Ye Zhirui, "Traffic Signal Synchronization in the Saturated High-Density Grid Road Network", *Computational Intelligence and Neuroscience*, vol. 2015, Article ID 532960, 11 pages, 2015. <https://doi.org/10.1155/2015/532960>

b. All-Way Stop Control has been shown not to mitigate traffic. W. Martin Bretherton, Jr. P.E. "reviewed over seventy technical papers concerning all-way stops (or multi-way stops) and their successes and failures as traffic control devices in residential areas. This study is the most comprehensive found on multi-way stop signs. . . The Manual on Uniform Traffic Control Devices . . . does not describe the problems . . . These problems include . . . traffic noise, automobile pollution . . . Multi-way stop signs have high operating costs based on vehicle operating costs, vehicular travel times, fuel consumption and increased vehicle emissions. . . Bretherton, W.M., Jr., "Multi-way Stops: The Research Shows the MUTCD is Correct!" In *ITE Annual Meeting Compendium, 1999*, TRB, National Research Council, Washington, D.C., 1999." p. 2. <https://www.eastgr.org/DocumentCenter/View/2006/Multi-way-Stops-The-Research-Shows-the-MUTCD-is-Correct-W-Martin-Bretherton-Jr-PE>

3. In the *River North* immediate project area, existing bus routes will be impacted. The S40, S90, S44, and S94 travel along Richmond Terrace past the proposed construction site. The S40 has a bus stop at the corner of Nicholas Street and Richmond Terrace. The S52 has a stop at Hamilton Avenue at St. Marks Place.

Additionally, 20 MTA bus routes travel from their starting point at the Staten Island Ferry Terminal/St. George through one or more of the intersections that the DEIS describes as adversely impacted.

The DEIS states: "The . . . methodology also expresses the quality of traffic flow in terms of level of service (LOS), which is based on the delay that a driver typically experiences at an intersection. The LOS scale ranges from A, representing minimal delay (10 seconds or less per vehicle), to F, which represents long delays (greater than 80 seconds per vehicle) . . . At LOS D, the influence of congestion becomes noticeable. LOS E is considered to be the limit of acceptable delay, and LOS F is considered to be unacceptable to most drivers." DEIS, p. 5-16.

“Existing traffic volumes for the study area intersections were collected in May 2019. In addition, traffic volumes for two study area intersections were obtained from counts conducted in June 2016 as part of the Bay Street Rezoning and Related Actions FEIS.” DEIS, 5-23.

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “The Proposed Actions would result in a significant adverse transportation impact in the area of traffic.

“Five intersections (comprising ten intersection approaches/lane groups) in the study area would potentially experience significant adverse traffic impacts in at least one peak hour. There would be no significant adverse transportation impacts in the areas of transit, pedestrians, or vehicular safety.” DEIS, p. E-24.

“In summary, of the 51 total intersection approaches/lane groups in the study area, the following 16 would operate worse than mid-LOS D in at least one peak hour” - Richmond Terrace at Jersey Street, Richmond Terrace at Westervelt Avenue, Wall Street at Richmond Terrace, Victory Boulevard at Bay Street, St. Marks Place at Victory Boulevard, Hamilton Avenue at St. Marks Place. DEIS, pp. 5-31 - 5-35.

4. The DEIS submitted by the applicant, Richmond SI Owner, LLC, describes the interference with local vehicular and pedestrian traffic that will take place during the 4+ year River North construction period, “Staging, receiving, and other secondary construction activities would occur on Projected Development Site 1 and in the temporary sidewalk closures along Richmond Terrace, Stuyvesant Place, and Hamilton Avenue along the site’s frontage.

“Staging Area 1 would be located at the corner of Stuyvesant Place and Hamilton Avenue. Staging Area 2 would be in the vicinity of the intersection of Stuyvesant Place and Richmond Terrace, between Buildings 1 and 2. Staging Area 3 would be between Buildings 2 and 3.

“Trucks would egress the site at the intersection of Richmond Terrace and Stuyvesant Place (Staging Area 2), where flaggers would assist truck traffic onto Richmond Terrace.

“Trucks and smaller vehicles may occasionally egress to Stuyvesant Place or Hamilton Avenue and use local streets to return to Richmond Terrace.

“Construction access would occur on all four sides of Buildings 1 and 2, and on three sides of Building 3. The construction access to multiple sides of the buildings would allow for more efficient construction than buildings of similar size with more limited construction access.

“Traffic lanes and sidewalks would be closed or protected during the construction period at varying lengths of time.

“Depending on the stage of construction, truck movements would generally occur between 6:00 AM and 3:00 PM . . .

“Due to construction activities, there would be temporary closing of on-street parking and sidewalks, but pedestrian circulation and access would be maintained through the use of a temporary sidewalk. During construction of Projected Development Site 1, the sidewalks and 8-

foot-wide on-street parking lanes at the site's frontage along Richmond Terrace, Stuyvesant Place and Hamilton Avenue would be closed to accommodate construction activities." DEIS, pp. 11-9 - 11-10.

Comments on the River North DEIS section: Parking

The DEIS submitted by the applicant, Richmond SI Owner LLC, describes the adverse impact of the *River North* project on parking.

The DEIS states, "The parking analysis evaluates the off-street public parking supply and utilization at the five public parking facilities within a 1/4-mile radius of the Project Site. In the With-Action Condition, 409 parking spaces would be provided on the Project Site and the Proposed Actions would generate a peak parking demand during the overnight period of approximately 475 spaces for both the typical weekday and Saturday conditions.

This demand would result in a peak parking shortfall of approximately 66 spaces during the overnight period." DEIS, p. E. 25.

1. Added to that shortfall, the MTA's North Shore Bus Rapid Transit will now require the elimination of 200 more parking spaces along Richmond Terrace, in front of the applicant's property, from Nicholas Street to the Staten Island Ferry.

Before the *Empire Outlets* mall was made possible by zoning variances, and thus blocked the BRT's proposed ground level terminus, its entire route would have been along the old railway line right of way under the control of the New York City Economic Development Corporation, ending at the ferry terminal, and thus, would have avoided using local streets.

<https://new.mta.info/document/10486>

The new transit plan, re-designed because of the *Empire Outlets'* location, now requires the buses to leave the shore level railway right-of-way and ascend onto Richmond Terrace at Nicholas Street. The buses will then travel with cars and bicycles, along Richmond Terrace, past the public safety vehicles parked or double-parked in front of the 120th Police Precinct, and share the ramps at the ferry terminal with the existing multiple bus routes.

<https://www.silive.com/news/2019/05/mta-updates-study-on-north-shore-bus-rapid-transit-potential-light-rail.html>.

To accommodate the buses, approximately 200 street parking places will be eliminated, as will the NYC Department of Transportation's "recently installed dedicated bike lane," paid for by taxpayer dollars. [Shapiro, Rachel, "A plan to improve harrowing ride for cyclists on North Shore", *Staten Island Advance*, August 31, 2017. https://www.silive.com/news/2017/08/biking_in_st_george_can_be_har.html har.html]

2. Additionally, the DEIS submitted by the applicant, Richmond SI Owner LLC, states, "Construction of the Proposed Project (4 plus years) would generate a maximum parking demand of approximately 260 spaces during the weekday midday period. The operational parking analysis conducted for the Proposed Project indicates that in the No-Action Condition,

off-site public parking facilities within 1/4-mile of the Project Site would operate at approximately 82 percent utilization with approximately 468 available spaces during the weekday midday period.” DEIS, p. E-31.

The *NY Wheel*'s parking garage appears to be closed. How does this figure into the applicant's DEIS on the subject of parking spaces available in the vicinity?

Additionally, construction is planned to remove another current parking lot site in St. George on Hyatt Street. How does this figure into the DEIS on the subject of parking spaces?

How does implementation of the Staten Island Bus Rapid Transit and the removal of 200 on street parking spaces figure into the applicant's DEIS?

3. The applicant's DEIS underestimates the demand for automobile ownership, and thus for parking, in this area due to the dearth of open space and of convenient, affordable essential retail, such as supermarkets. Staten Island is the only borough without a *Bike Share* Program.

The nearest supermarket to the proposed site is $\frac{3}{4}$ of a mile away at the corner of Bay Street and Victory Blvd. The pedestrian route to and from is down and up hilly terrain, with or without a shopping cart in all types of weather.

The bus route from the *River North* site to the one local supermarket requires either taking 2 buses with a transfer at the ferry terminal, or walking to and from the ferry terminal and using a bus along Bay Street.

The rail route to the supermarket is either to walk to, or to wait for and to take the S40 bus, to the Staten Island Ferry Terminal/St. George and transfer to the Staten Island Rapid Transit for one stop to Tompkinsville.

The Staten Island Rapid Transit only travels along the eastern and southern shores of Staten Island and waiting times for buses in non-rush hours and on weekends can be upwards of 20 minutes in all types of weather. The S40 is the only current bus route which stops nearest the proposed River North site. It stops at Richmond Terrace and Nicholas Street.

Reliance on car service, Uber or Lyft to travel to purchase groceries, or on food deliveries, would substantially increase the cost of living for the “affordable” dwelling units. The car owners, among the occupiers of the “affordable” dwelling units, would also rely on “on-street” parking to avoid “off-site” garage costs.

Paying for off-street parking would across increase expenses for renters of the “affordable” units.

Would the parking within the *River North* complex be free to tenants?

During the several year construction period, on-street parking would be reduced, especially on Nicholas Street, Richmond Terrace and Hamilton Avenues which border the *River North* site.

This would increase expenses for the many households identified in this DEIS as having less than a median income.

Comments on the River North DEIS section: Air Quality

The quality of the air that the people living, working, and going to school around the *River North* project would be adversely affected by *River North*.

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “Dispersion modeling analysis of construction-related air emissions from the worst-case construction period confirmed that construction under the Proposed Actions and would not result in significant adverse air quality impacts with the following emission control measures:

“Ultra-low-sulfur diesel (ULSD) fuel would be used for all diesel engines;

“All equipment would use Best Available Technology (BAT) to minimize particulate emissions. The BAT includes diesel particulate filters on all nonroad equipment with a capacity of 50 horsepower (hp) or less;

“For construction on Building 3, diesel generators rated at less than 50 hp, would use diesel particulate filters (DPFs), either installed by the original equipment manufacturer (OEM) or retrofitted;

“All non-road construction equipment with a power rating of 50 hp or greater would meet at least the Tier 3 emissions standard to the extent practicable.

“Vehicle idle time would be restricted to three minutes for equipment and vehicles that do not require their engines to operate a function such as loading, unloading, or processing device (e.g., concrete mixing trucks), or as otherwise required for the proper operation of the engine.” DEIS, p. E-31.

1. There is no statement as to who will be the on-site responsible party or which agency which will enforce the emission controls included in the DEIS. Which agency will be ensuring that these mitigations are in effect?

Or, will enforcement consist of reacting to complaint to the NYC Buildings Department? How can members of the neighborhood enter a private construction site with a stop-watch, and verify which fuel is used in the vehicles and what is the hp rating of the construction equipment?

2. There is no statement as to how dust from the construction would or would not adversely affect air quality or how it would be contained. People in the St. George/Stapleton area suffer from higher rates of asthma hospitalization than the city as a whole and “in St. George and Stapleton levels of the most harmful air pollutant, fine particulate matter (PM_{2.5}) are 7.1

micrograms per cubic meter.” NYC Department of Health Environment & Health Data Portal.
https://a816-dohbesp.nyc.gov/IndicatorPublic/QuickView.aspx?report_id=78

Historically, the St. George area has had high levels of particulate-matter concentrations.
<https://cityroom.blogs.nytimes.com/2009/12/16/survey-finds-street-level-air-pollution-in-manhattan/>

3. The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “Absent mitigation, the Proposed Actions would result in a significant adverse air quality impact due to mobile source emissions from traffic. Emissions of PM_{2.5} over annual and 24-hour periods would exceed both National Ambient Air Quality Standards (NAAQS) and CEQR *de minimis* criteria due to a deteriorating traffic conditions [sic] at the intersection of St. Marks Place and Hamilton Avenue . . .” DEIS, p. 6-2.

a. This is an intersection with a high density of residents, and school students and school staff. Within .2 miles of this intersection are located two high schools with adolescent student bodies and faculty and staff. Curtis H.S. with 2587 students and 190 staff is at the intersection of Hamilton Avenue and St. Marks’ Place. McKee High School, with 820 students and 71 staff is at 290 St. Marks Place.

The MTA S52 bus has a stop at Hamilton Avenue and St. Marks Place. It is used by the students and staff of Curtis High School who wait there for a bus.

The DEIS states, “In the With-Action Condition, absent mitigation, there would be an increase in traffic volumes and extensive delays along Hamilton Avenue. The analysis indicates that concentrations of PM₁₀ would not exceed 24-hour NAAQS thresholds, however, PM_{2.5} 24-hour and annual concentrations would exceed both the NAAQS and *de minimis* thresholds if the emissions generated during the AM peak hour are assumed over a 24-hour period. Therefore, significant adverse air quality impacts cannot be ruled out, and the Proposed Actions would result in a significant adverse air quality impact from mobile emissions sources. This significant adverse impact would be fully mitigated with the installation of an all-way STOP-control, as described in Chapter 13, “Mitigation.” DEIS, p. 6-2.

b. There is a large residential population of over a 1,000 people alongside and adjacent to Hamilton Avenue: the *Castleton Park Apartments* on St. Marks Place between Hamilton Avenue and Nicholas Street, with 454 rent-protected apartments; The *Harbor View North Apartments*, 60 Hamilton Avenue with 109 rent-stabilized apartments, The *Alexander Hamilton Apartments*, 36 Hamilton Avenue with 120 apartments.

An all-way stop is a four-way stop and does not mitigate emissions. One is already in place at the intersection of St. Marks Place and Hamilton Avenue. It requires vehicles on all the approaches to the intersection to stop at the intersection before proceeding through it. However, studies have shown that stops signs do not mitigate air pollution. Noise pollution is increased due to braking and acceleration. Emissions increase as vehicles accelerate and decelerate.

W. Martin Bretherton, Jr. P.E. “reviewed over seventy technical papers concerning all-way stops (or multi-way stops) and their successes and failures as traffic control devices in residential areas. This study is the most comprehensive found on multi-way stop signs . . .The Manual on Uniform Traffic Control Devices . . .does not describe the problems . . .These problems include . . .traffic noise, automobile pollution . . .Multi-way stop signs have high operating costs based on vehicle operating costs, vehicular travel times, fuel consumption and increased vehicle emissions. . . Bretherton, W.M., Jr., “Multi-way Stops: The Research Shows the MUTCD is Correct!” In *ITE Annual Meeting Compendium, 1999*, TRB, National Research Council, Washington, D.C., 1999.” p. 2.
<https://www.eastgr.org/DocumentCenter/View/2006/Multi-way-Stops-The-Research-Shows-the-MUTCD-is-Correct-W-Martin-Bretherton-Jr-PE>

The *River North* project would have an adverse effect on Air Quality of the people living, working, and going to school in its vicinity, and the mitigating proposals of the applicant, such as using low sulfur diesel fuel and All-Way Stops, are either not reasonably verifiable, or have been demonstrated to be counter-productive.

Comments on the River North DEIS section: Neighborhood Character

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “The Proposed Actions would not result in significant adverse impacts to neighborhood character. The Proposed Actions would not result in significant adverse impacts in the any of the technical areas that contribute to a neighborhood’s character, including land use, zoning, and public policy, socioeconomic conditions, shadows, urban design and visual resources, historic and cultural resources, or noise.” DEIS, p. E-28.

On the contrary, the applicant’s proposed actions will have a significant adverse impact on the neighborhood’s character in the area of air quality, land use, zoning, public policy, noise, etc., as commented upon in the previous 47 pages.

The applicant is requesting permission to construct the two tallest buildings ever on Staten Island. The applicant is requesting a change in zoning to the *Special St. George District*, and removal of the restrictions of the *Special Hillside Preservation District* designation that designed to preserve the natural hillside character of the property and introduced by NYC DCP in 1987.

As prior members of the NYC Planning Commission concluded almost thirty years ago in 1992, “North Shore Staten Island Redevelopment should respect the site's topography and historic structures.” Department of City Planning NYC DCP 92-27.
http://www.deltacityofthefuture.nl/documents/NYC_comprehensive_waterfront_plan.pdf

Comment on the River North DEIS section: Public Health

The DEIS submitted by the applicant, Richmond SI Owner, LLC, states “The majority of development projects do not require a public health assessment. According to the *CEQR Technical Manual*, if there are no significant unmitigated adverse impacts identified in CEQR analysis areas such as air quality, water quality, hazardous materials, noise, or construction, a public health analysis is not warranted.” DEIS, p. 9-1.

1. The NYC Department of City Planning is New York City’s lead review agency for *River North*. Its cover letter to this Draft Environmental Impact statement (DEIS) states, “Under SEQRA and CEQR, the lead agency is required to take a ‘hard look’ at the environmental impacts of proposed projects . . .” <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/noc-deis.pdf>

A synonym for “hard” is “conscientious”. Based on the many unmitigated adverse impacts, including air quality, noise, open space, etc., the omission of any analyses of the effect of dust, and the questionable boundaries of the Study Area with almost 50% water bodies, should the topic of impact on public health be explored in the DEIS?

Comments on the River North DEIS section: Noise

Noise related to construction includes noise from: concrete mixers, pile drivers, bulldozers, cranes, jackhammers, backhoes, hammer drills, forklifts, haul trucks, etc. These will be used to construct buildings taller and more dense than current zoning for the land permits. The construction will take place over 4+ years. *River North* will have an adverse impact on thousands of people who live, work, and go to school in the area.

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “Construction resulting from the Proposed Actions have the potential to result in a temporary significant adverse noise impact. . . The increase in noise levels at nearby receptors would primarily be due to noise generated by on-site construction activities (rather than construction-related traffic).” DEIS, p. E-32.

Significant adverse construction traffic impacts would occur at seven intersection approaches/lane groups, and significant adverse construction noise impacts would occur at 20 locations.” DEIS, p. E-29.

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “The Proposed Actions have the potential to result in a temporary significant adverse construction-period noise impact because of the duration and magnitude of the projected construction-period noise levels. Significant adverse construction noise impacts were identified . . .

“The Applicant has committed to implementing certain controls that exceed the noise control measures required by the New York City Noise Control Code. These measures include using auger drills in lieu of impact pile drivers and ventilation fans that would not exceed a noise level of 91-dBA . . . However, even with these measures, elevated construction-period noise levels are predicted to occur at certain locations. . . If additional path control mitigation measures are not able to be implemented because they are not feasible and practicable mitigation, there would be significant adverse construction-period noise impacts that would remain unmitigated.” DEIS, p. E-35

The DEIS identifies that most of the adverse noise impact will be endured by people living in “affordable” housing surrounding the *River North* site.

“Due to site topography, it is possible that elevated construction-generated noise may cause additional significant adverse impacts to all floors of the Castleton (sic) Apartments.” DEIS, pp. 11-44 - 11-45.

The applicant’s DEIS states, “When accounting for multiple floors at receptors, the properties of concern where the CEQR noise criteria of 3 dBA or more would be exceeded for two or more years under worst-case conditions are”:

Castleton Park Apartments – South Tower (185 St. Marks Place) – All Floors;
Castleton Park Apartments – North Tower (165 St. Marks Place) – All Floors;
Castleton Park Apartments North Playground (sic);
Castleton Park Apartments South Playground (sic).
51 Stuyvesant Place – All Floors
1 Hamilton Avenue – All Floors;
36 Hamilton Avenue – All Floors;
41 Hamilton Avenue – All Floors;
47 Hamilton Avenue – All Floors;
53 Hamilton Avenue – All Floors;
59 Hamilton Avenue – Floors 2-3;
60 Hamilton Avenue – All Floors;
140 Richmond Terrace – All Floors;
100 Richmond Terrace – All Floors;
160 Richmond Terrace – All Floors;
198 Richmond Terrace – All Floors;
204 Richmond Terrace – All Floors;
224 Richmond Terrace – All Floors;
205 St. Marks Place – Level 3;
199 St. Marks Place – All Floors.

Because of the size and scope of the *River North* project, the first phase of construction is projected to take at least three years. Construction at the project site will affect the occupants of over 700 surrounding apartments and thousands of people.

Some of the immediately affected buildings are:

36 Hamilton Avenue, with 120 apartments,

60 Hamilton Avenue with 108 apartments.

Castleton Park Apartments at 165 and 185 St. Marks Place, 454 apartments

224 Richmond Terrace at Nicholas Street with 40 apartments.

The construction sites are also near three public schools:

Curtis High School (across St. Marks Place from the *Castleton Park Apartments*) with over 2,500 students,

McKee High School at 290 St. Marks Place, with almost 800 students,

Harbor View (PS 59) Elementary School with several hundred pupils at 300 Richmond Terrace.

a. Loud noise has an adverse effect on hearing: “With powerful machinery and heavy-duty tasks, construction sites are some of the noisiest places. . . any exposure to noise above 85 decibels is not recommended.” “Construction Site Noise: What’s the Risk?” *Industrial Safety and Hygiene News*. October 17, 2018. <https://www.ishn.com/articles/109569-construction-site-noise-whats-the-risk>.

b. Loud noise has an adverse effect on child development: “The reviewed studies document harmful effects of noise on children’s learning. Children are much more impaired than adults by noise in tasks involving speech perception and listening comprehension. Non-auditory tasks such as short-term memory, reading and writing are also impaired by noise.” Klatte, Maria; Bergstroem, Kirstin; and Lachmann, Thomas, “Does noise affect learning? A short review on noise effects on cognitive performance in children” *Frontiers in Psychology*, August 30, 2013. <https://www.frontiersin.org/articles/10.3389/fpsyg.2013.00578/full>

The active open space of playgrounds, already identified in the DEIS as not sufficient, will be off limits, for the multi-year construction phase of the project, to the children who live in the *Castleton Park Apartments*.

Who or what on-site agency is designated to pro-actively enforce the applicant’s noise mitigation proposal? Alternatively, will area residents be required to purchase their own decibel monitors and reactively report violations to the appropriate authority?

Comments on the River North DEIS section: No Action Alternative

The DEIS submitted by the applicant, Richmond SI Owner LLC, states, “In the No-Action Alternative, the Site B portion of Projected Development Site 1 would be developed with . . . 167 market rate DU [Dwelling Units] . . . 8,240 gsf of retail space, and 12,125 gsf of accessory parking (29 spaces). Of the 131 required parking spaces, 103 would be provided off-site and within 600 feet of Site B. The building would be developed pursuant to R6 height factor regulations . . . DEIS, p. E-35.

“Compared to the Proposed Actions, the No-Action Alternative would contain less development and generate fewer demands for community resources such as schools, open space, transportation, and sewers.

“However, the No-Action Alternative would not achieve the goals and objectives as described in the “Purpose and Need” section of the Project Description, specifically in regards to increasing housing supply in the area and the provision of affordable units.”

1. A review of the Purpose and Need comments to this DEIS will illustrate that the applicant had not made a substantive case for the *River North* project.
2. Is it worthy to use “affordable” units, and people on a budget, as an excuse to trample their local terrain and otherwise adversely affect the people currently living in the neighborhood’s “affordable” housing?

There are other available lots in St. George that do not have such a steep slope and on which affordable housing could be built, for example, according to an April 23, 2021 article in the *Staten Island Advance*, a one-acre parcel of land is currently for sale in the *Special St. George District*. [Porpora, Tracey, “For sale: \$12.5M St. George site with plans for a 20-story residential building,” *Staten Island Advance*, April 23, 2021 <https://www.silive.com/news/2021/04/for-sale-125m-st-george-site-with-plans-for-a-20-story-residential-building.html>]

3. The applicant has the right to build the largest building that is permissible on the Block 13 lots which are still governed not only by R6, but by *Special Hillside Preservation District* regulations as well.
4. Finally, should the DEIS consider whether the construction of the *River North* project would impact plans to develop the *Bay Street Corridor*, which begins at a distance of 6/10 mile from the Staten Island Ferry Terminal/St. George? It has many vacant lots for which there are plans to develop housing and retail units: “The Bay Street Corridor Neighborhood Plan will connect the existing mixed-use town centers of St. George, Tompkinsville and Stapleton by creating a new walkable neighborhood with opportunities for housing, businesses and jobs with access to existing public transportation. . . . The Plan is a part of *Housing New York*, the Mayor’s housing plan to build and preserve affordable housing through community development initiatives and to foster a more equitable and livable New York City.” <https://www1.nyc.gov/site/planning/plans/bay-street-corridor/bay-street-corridor.page>

Comment on the River North DEIS section: Unavoidable Adverse Impacts

The *River North* project has many deleterious outcomes.

The DEIS submitted by the applicant, Richmond SI Owner LLC, states: “The Proposed Actions would result in significant adverse impacts to open space and transportation. Mitigation is being considered to the extent practicable for these identified significant adverse impacts. However, in some instances no practicable mitigation would be able to fully mitigate significant adverse

impacts, and no reasonable alternatives would meet the purpose and need of the project, eliminate their impacts, or not cause other or similar significant adverse impacts.” DEIS, p. E-36.

These are only two of the many adverse impacts that were included earlier in this DEIS. Air quality and noise, among others, were also identified. If the site was developed within the current zoning stipulations, much of the harmful effects of construction would be reduced.

The applicant’s wish to build the tallest buildings on Staten Island, does not outweigh the long-term adverse effects of the *River North* project. The items the applicant put forward in the Purpose and Need section of this DEIS were not substantive.

Comments on the River North DEIS Appendix B Proposed Zoning Text Amendments

1. Is there anywhere in this DEIS, that the applicant is required to address the effects of the requested zoning map and text amendments on the *Special St. George District*?

Specifically, the Draft Environmental Impact Statement (DEIS) submitted by the applicant, Richmond SI Owner LLC, states, “Richmond SI Owner LLC, the project Applicant, seeks a series of discretionary land use actions including a zoning map amendment, zoning text amendments, and a special permit (the “Proposed Actions”) from the City Planning Commission (CPC) to facilitate the development of a mixed-use project comprising residential and commercial uses, open space, and accessory parking (the “Proposed Development”) in the *St. George* neighborhood of Staten Island, Community District 1 (see Figure 1).” DEIS, p. E-1.

The applicant’s requested zoning map amendment and zoning text amendments apply specifically to the *Special St. George District* that does not currently include the applicant’s land. The applicant wants to change that situation and to simultaneously re-design the *Special St. George District* to suit the plans for *River North*. The *Special St. George District* was not created by one developer alone, but by a community.

Despite this sweeping request, to add higher density and allowable height, etc., to the *Special St. George District*, the applicant’s entire Draft Environmental Impact Statement only addresses the *River North* Project Area which would if, approved, become a tiny area of the *Special St. George District*, but which has many adverse effects on the surrounding neighborhood.

2. As the applicant, Richmond SI Owner, LLC, is requesting amending the zoning of the *Special St. George District*, has the applicant’s Draft Environmental Impact Statement complied with the required Study Area as defined by the *CEQR Glossary*? The Study Area should be:

“The geographic area likely to be affected by the proposed action for a given technical area, or the area in which impacts of that type could occur. This is the area subject to assessment for that technical area.” <https://www1.nyc.gov/site/oec/environmental-quality-review/ceqr-glossary.page>

The *CEQR Manual* states, “Often, it is appropriate to use primary and secondary study areas: the primary study area is closest to the project site and, therefore, most likely to be directly affected; the secondary study area is farther away and receives less detailed scrutiny, but could experience indirect effects, such as changes to area trends.” https://www1.nyc.gov/assets/oec/technical-manual/02_Establishing_the_Analysis_Framework_2020.pdf

Conclusion

“Many are skeptical that citywide planning is feasible in a city as complex and dynamic as New York City. Yet, such an effort initiated by the commission would at least allow a public discussion of whether we are choosing the right neighborhoods for the strategy of rezoning, and what steps are necessary to truly confront the risks of gentrification and displacement.”

Savitch Lew, Abigail, “NYC’s Planning Commission: Rubber Stamp or Checks and Balances?”, citylimits.org, August 9, 2017.

<https://citylimits.org/2017/08/09/nycs-planning-commission-rubber-stamps-or-checks-and-balances/>

The NYC Department of City Planning is the lead agency for *River North*. The cover letter to this DEIS states, “Under SEQRA and CEQR, the lead agency is required to take a ‘hard look’ at the environmental impacts of proposed projects, . . .”

As described in the 53 previous pages of these comments, for many of the adverse effects of the *River North* project, there are no possible mitigations, and nowhere in this DEIS is there a discussion of any impact of the change to R7-3 zoning on future development of the *Special St. George District*.

The applicant’s DEIS misstates the location of the *River North* project, as being on “a peninsula”. And the shortcomings of the *River North* DEIS Study Area, derived from this designation, are stated in the applicant’s DEIS: “Being on a peninsula near the northeastern edge of Staten Island, the area within 0.5-miles of the Project Area is approximately 50 percent waterbodies. The Study Area established by *CEQR* methodologies therefore reflects a population density and population less than other inland areas of the St. George neighborhood . . .” DEIS, p. E-18 and DEIS, p. 2-21.

Despite the questionable boundaries of the applicant’s Study Area, the DEIS submitted Richmond SI Owner LLC, still has provided numerous examples in which mitigation of the adverse effects of the *River North* project is impossible in a neighborhood in which, “Compared to Staten Island and New York City, a larger portion of households in the Study Area earn less than \$25,000.” DEIS, p. 2-7.

The purpose and need of the project’s applicant, Richmond SI Owner, LLC, seems to be both to build the largest, most densely populated buildings covering the most land, currently zoned R6 and within the *Special Hillside Preservation District*, using the catch phrase ‘affordable housing’, and to make any and all changes to the *New York City Zoning Resolution* necessary to accomplish that goal.

The *River North* project contradicts both decades of NYC Planning Commission work for St. George and Staten Island, and long-standing NYC policy regarding the manner of Staten Island's North Shore development.

The applicant's DEIS has not demonstrated that any envisioned benefit outweighs the potential long-term adverse effects of the *River North* project on the health and quality of life of the thousands of residents of the immediate area, as well as on the workers in the many government and private buildings in St. George, and on the thousands of Staten Island children who attend the local public schools, and on the thousands of commuters whose lengthy travel times includes travel in the streets surrounding the applicant's project site.

Undoubtedly, the thirteen members of the NYC Planning Commission are frequently called upon to make difficult decisions about the merits of a project.

In the this case, reading beyond a catch phrase, and taking a deeper dive into the narrative of *River North's* Draft Environmental Impact Statement, the document demonstrates that whatever benefit espoused by the *River North* project clearly does not justify its adverse effects upon thousands of people for a very long time.

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Priority Mail to:
CITY PLANNING COMMISSION
Calendar Information Office
120 Broadway - 31st Floor,
New York, NY 10271

July 14, 2021

Calendar Nos. 47, 48, 49

Borough: Staten Island

ULURP Nos. N210281 LDR, C210289 ZMR, N210290 ZRR, C210291 ZSR

Project Identification CEQR No. 20DCP140R

CD No. 1

I, Helen Northmore, respectfully request each of the current members of the New York City Planning Commission to vote no on each of the applicant's (Richmond SI Owner, LLC) requests for a zoning map amendment relating to the *Special Hillside Preservation District*, R-6, and *Special St. George District* designations, zoning text amendments to the *Special St. George District*, and special permits.

Public Hearing Calendar No. 47: C 210289 ZMR

Comments on the applicant's (Richmond SI Owner, LLC) request for a Zoning Map change for 11 property lots.

The applicant proposes to move the 11 lots, on the map in the request, from their current R6 designation, *Special Hillside Preservation District* designation, and C2-2 zoning designation, and to merge them with the *Special St. George District*. In the next calendar item before the Commission today, No. 48, the applicant is then requesting to remove special provisions in the *Special St. George District*, that were approved by the NYC Planning Commission in 2008. Beyond that, in calendar item No. 49, the applicant is requesting permission to construct buildings of the *River North* design, which are vastly over-sized and out-of-context in, and out-of-compliance with the *Special Hillside Preservation District* and R-6 zoning. The proposed dense buildings are of 26, 25, and 11 stories (plus bulkhead) and will include 750 apartments on approximately 2.2 acres of land, in a neighborhood that is already acknowledged to be short on open space and for which zoned public elementary schools are over-capacity. Among other stipulations, property's current zoning restricts the height of buildings to 70 feet or approximately 7 stories.

On June 23, 2021, I submitted lengthy comments on the applicant's (Richmond SI Owner, LLC) River North Draft Environmental Impact Statement (DEIS) to the NYC Department of

City Planning. The *River North* project will produce numerous unmitigated adverse effects on thousands of men, women, and children who live, work, go to school, commute, and recreate in the neighborhood surrounding these lots.

These following comments are directed specifically at the zoning changes requested by the applicant.

On the Standing of the Zoning Map Change Request

Firstly, I ask the Commissioners to clarify whether this request for a zoning map change is valid under the current provisions of the *Special Hillside Preservation District* in which the applicant's property is located.

This application, as mapped, includes among others, lots that extend from Stuyvesant Place to Nicholas Street along Richmond Terrace. The applicant's property consists of only three of the eleven lots mapped in the application. The applicant's properties are Block 13, Lots 82, 92, and 100.

The *Special Hillside Preservation District* regulations state, "Notwithstanding the provisions of Section 78-06 (Ownership), a zoning lot having an average percent of slope of 10 percent or greater which is the subject of an application under this section may include adjacent properties in more than one ownership, provided that the application is filed jointly by the owners of all the properties included. Any subdivision of the tract before, during or after development shall be subject to the provisions of Section 78-51 (General Provisions)" 119-03. <https://zr.planning.nyc.gov/article-xi/chapter-9>

At least some of the zoning lots, included in the applicant's request for zoning changes, have a slope of 10 percent or greater as determined by the NYC Department of City Planning. <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/appendc-deis.pdf>

According to a review of the latest NYC Department of Finance Records, the request for a zoning map change submitted by the applicant, Richmond SI Owner LLC, has included other owners' properties as mapped in this application. Specifically, current NYC Department of Finance records show that the following lots in this request for a zoning map change are not owned by the applicant:

Block 12, Lot 1 is owned by E&V Staten Island LLC., 140 Stuyvesant Pl. SI, NY 10301.

Block 13, Lot 8 is owned by Castleton Preservation Housing Company, Inc., 165 St. Marks Place, Staten Island, NY 10301.

Block 13, Lot 60 is owned (1/26/18) by AAB 224 Richmond Terrace LLC., 224 Richmond Terrace, Staten Island, NY 10301.

Block 13, Lot 68 is owned (11/24/20) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 71 is owned (1/20/21) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 73 is owned (11/24/2020) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 116 (12/12/2008) is owned by Borok Holding Company, LLC, 41 Hamilton Ave., SI, NY 10301.

Block 13, Lot 119, is owned by (individual person), 41 Hamilton Avenue, SI, NY 10301.
<https://a836-pts-access.nyc.gov/care/forms/htmlframe.aspx?mode=content/home.htm>

If this is a joint application by the multiple owners of all the other lots that are included in this application, why is Richmond SI Owner, LLC, the only property owner listed in the application? If only one property owner is making this application, under existing *Special Hillside Preservation District* regulations, is it valid to include other owners' properties?

On the Substance of the Zoning Change Request

Secondly, as the Commissioners are aware, the purpose of the current R6 zoning and *Special Hillside Preservation District* (1987) designation for Block 13, within which the applicant's property is located, is to protect the character of the neighborhood and the topography of the hillside. To that end both the lot coverage and building height are restricted. The maximum allowable height of a building is 70 feet. 119-212 Special Hillside Preservation District. 1987.

In 1987, in reaction to problems caused by residential construction that did not account for the local hilly terrain, the New York City Planning Commission created a special Staten Island district to "protect, maintain and enhance the natural features" such as the slope of the hillside and "to protect the neighborhood character of the district." At the time of its creation, 11% of the lots in the *Special Hillside Preservation District* were vacant and

consisted of 55% with an average angle of slope of 10% to 35%, 9% with an average slope of 35% or more, and 36% with an average percent of slope of less than 10%.”

At that time the NYC Planning Commission stated, “As the most readily developable areas have been exhausted, the more steeply sloped hillsides which characterize much of the remaining vacant acreage have become prime development sites . . . the Commission finds that this District will preserve the unique natural features on the North Shore – the hillsides – while guiding development in a way which is harmonious with the unique topography and in character with the established neighborhoods. . . No development, enlargement or site alteration is permitted on any portion of a zoning lot having a slope of 35% or more. Said portion of a zoning lot shall remain in its natural state, unless an authorization is granted by the City Planning Commission pursuant to Section 119-30 (Special Review Provisions) . . .”

119-02 Special Hillsides Preservation District.

<https://www1.nyc.gov/assets/planning/download/pdf/about/cpc/870002.pdf>

When the *Special Hillsides Preservation District* was created in 1987, one of the commissioners was publicly quoted as saying, “For the first time, zoning recognizes that the world is not flat.” Marilyn Mammano, NYC Planning Commissioner, 1987. *New York Times*, July 19, 1987, Section 8, p.1. <https://www.nytimes.com/1987/07/19/realestate/forcing-buildings-to-respect-the-hills.html?searchResultPosition=1>

The applicant’s proposed changes to the property’s zoning dismantle decades of meaningful work by the New York City Planning Commission which seeks to encourage appropriate land use on Staten Island while safeguarding the topography of a naturally steep terrain, including inclines similar to ski slopes. *The City Record, Official Journal of the City of New York*, Volume CXLVIII, Number 124, Tuesday June 29, 2021 pp. 3988-3994 20DCP140R_DEIS_Hearing Notice_1.pdf <https://a856-cityrecord.nyc.gov/RequestDetail/20210624002>

“The *Special Hillsides Preservation District* (HS) guides development in the steep slope areas of Staten Island’s Serpentine Ridge, an area of approximately 1,900 acres in the northeastern part of the borough. . . .The primary means of regulating development in the district is to control the amount of the lot that can be covered by a building. As the development site becomes steeper, permitted lot coverage decreases (although the permissible floor area remains the same). This may result in a taller building but less impact on steep slopes and natural features. There are special regulations for the removal of trees, grading of land, and construction of driveways and private roads.” *New York City Department of City Planning. Effective Date: 6/30/87.* <https://www1.nyc.gov/site/planning/zoning/districts-tools/special-purpose-districts-staten-island.page>

The *River North* building project is proposed for the area, for which the applicant is requesting these zoning changes. Appendix C-2 of that River North DEIS [CEQR No. 20DCP140R] contains a map labelled “Limited Right of Opportunity”.

This July 2019 map labelled for a meeting between Madison Realty Capital and the NYC Department of City Planning identifies most of the property in this zoning request as a “Steep Slope Area” or a “Steep Slope Buffer” or an “Area Not Suitable for Building”.

On this July 2019 map, there is a text box with the statement, “The provisions of the *Special Hillside Preservation District* considers Site A as a Tier II site and Site B as a Tier I site. Site A is not feasibly developable without authorizations and site B is not fully developable due to limited area for a building footprint.”

<https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/appendc-deis.pdf>

The outcome of the July 2019 meeting with NYC Department of City Planning, would have made clear that a building project such as of the size of *River North* was not “feasible” on the property. <https://www1.nyc.gov/site/planning/applicants/applicant-portal/step2-begin-process.page>

It is reasonable to assume that these current requests to change the zoning of the property mapped in the application are a result of that determination two years ago.

However, as NYC planners concluded almost thirty years ago in 1992, “North Shore Staten Island Redevelopment should respect the site's topography and historic structures.” Department of City Planning NYC DCP 92-27.

http://www.deltacityofthefuture.nl/documents/NYC_comprehensive_waterfront_plan.pdf

Before continuing, a word of explanation about “Serpentine” as it appears in the *Special Hillside Preservation District* document. As the Commissioners may know, Serpentine does not refer to the shape of the *Special Hillside Preservation District*. It refers to the type of rock of which it is composed. According to the United States Geological Survey, the fibrous asbestos mineral chrysotile is found in the Serpentinite of the *Special Hillside Preservation District*. US Department of the Interior. USGS Occurrence of Asbestos in Richmond County, NY https://mrdata.usgs.gov/asbestos/show-asbestos.php?rec_id=615

“The Staten Island Serpentinite is a waxy, greenish-brown ultramafic crystalline rock . . . The elevations of the serpentinite surface detected by the well network range from about 30 feet below sea level to about 250 feet above sea level . . .” Rosenberg, Stephanie, “Hydrology of Staten Island, New York”, Stony Brook University, 2013. <https://www.geo.sunysb.edu/reports/rosenberg.pdf>

Not only does the applicant, Richmond SI Owner, LLC, not address the potential adverse effects of dust released by the proposed 4+ year *River North* construction project, the applicant does not address whether the site has been tested for asbestos that naturally occurs in Serpentinite and which is possibly beneath the 15 feet of fill that was tested for other hazardous materials.

Nothing addresses the possible adverse effects of asbestos dust released into the air during the 4+ years that would disrupt a 13,000 square feet area of the *Special Hillside Preservation District* to a depth of 30 feet. Thousands of men, women, and children live, work, go to school, commute, and recreate daily in the neighborhood surrounding the proposed construction site. River North DEIS, pp. 4-5- 4-6.

<https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/04-deis.pdf>

“Naturally occurring asbestos may be a health risk if disturbed and asbestos fibers are released into the air. When asbestos-containing rocks are crushed or broken through natural weathering processes or through human activities, asbestos-containing dust can be generated. Once asbestos fibers are released into the air, they may remain airborne or in the soil for a long time. Airborne asbestos fibers may pose a health hazard because of the potential risks associated with inhalation of the fibers.” “Naturally Occurring Asbestos”, United States Department of Agriculture, Forest Service, Pacific Southwest Region. October, 2008, R5-RG-147. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd551461.pdf

Should this potential adverse effect of an over-sized, out-of-context project in a *Special Hillside Preservation District* be ignored?

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New York, NY 10271

July 14, 2021

Calendar Nos. 47, 48, 49

Borough: Staten Island

ULURP Nos. N210281 LDR, C210289 ZMR, N210290 ZRR, C210291 ZSR

Project Identification CEQR No. 20DCP140R

CD No. 1

I, Helen Northmore, respectfully request each of the current members of the New York City Planning Commission to vote no on each of the applicant's (Richmond SI Owner, LLC) requests for: a zoning map amendment relating to the *Special Hillside Preservation District*, R-6, and *Special St. George District* designations, zoning text amendments to the *Special St. George District*, and special permits.

Public Hearing No. 48: N 210290 ZRR

Comments on Richmond SI Owner, LLC, the applicant's request to alter the text and the protections of the *Special St. George District*.

Richmond SI Owner, LLC., seeks to eviscerate the current *Special St. George District* regulations.

The applicant's request eliminates the *Special St. George District* combination of stipulations concerning: lot size, floor area ratio, lot coverage, open space, yards, height and setbacks. These determine the maximum size and placement of a building of a zoning lot.

The applicant's request increases the current *Special St. George District* maximum floor area ratio, FAR, to 6.0. The current maximum floor area ratio is 3.4.

The request eliminates the application of the underlying open space ratio, in an area already acknowledged to be short of open space.

The request eliminates the application of Street Wall location provisions.

The applicant's request eliminates the tower provisions of the *Special St. George District* that regulate the location, orientation, height, and height of the building base and establish tower exclusion areas. <https://zr.planning.nyc.gov/index.php/article-xii/chapter-8#128-35>

The applicant's request alters provisions regulating interior parking.

The applicant's request adds the area of the *Special St. George District*, including the waterfront area, to this provision of the Zoning Resolution: "R7-3 and R9-1 . . . Such districts may be mapped within the waterfront area and in the #Special Mixed Use District#. In addition, R7- 3 Districts may be mapped in the #Special Long Island City Mixed Use District#".

New York City zoning regulations already permit large-scale housing development in the St. George neighborhood and it can continue in the *Special St. George District*. Tall buildings can already rise without ever changing the current zoning regulations contained in the *Special St. George District*.

The applicant's proposed changes dismantle decades of meaningful work by the New York City Planning Commission which seeks to encourage appropriate land use on Staten Island while safeguarding the topography of a naturally steep terrain including inclines similar to intermediate-level ski slopes. *The City Record, Official Journal of the City of New York*, Volume CXLVIII, Number 124, Tuesday June 29, 2021 pp. 3988-3994 20DCP140R_DEIS_Hearing Notice_1.pdf. <https://a856-cityrecord.nyc.gov/RequestDetail/20210624002>

In 2008, nineteen years after the establishment of the *Special Hillside Preservation District*, the New York City Planning Commission tweaked the zoning within it, in a more densely developed, and older, 10-block area of the St. George neighborhood.

Recognizing concerns about the future of the already developed and underused space in part of the St. George neighborhood of Staten Island, the *Special St. George District* was established. In the following map link, SG denotes *Special St. George District*. HS denotes *Special Hillside Preservation District*.

<https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-maps/map21c.pdf>

"The *Special St. George District* (SG) was created to support a pedestrian-friendly business and residence district in a unique hillside waterfront community that is one of Staten Island's oldest commercial neighborhoods. . . Special rules enhance designated commercial streets by requiring continuous ground floor commercial uses, with large windows and wider sidewalks.

“The configuration of towers is regulated in order to preserve views from upland areas to the waterfront. Vacant office buildings can now be more easily converted to residential use. Special parking and landscaping provisions are intended to provide a pleasing pedestrian experience.”

“On April 10, 2008, the Department of City Planning (DCP) presented its proposal for a *St. George Special District* at the St. George Theater on Staten Island. DCP, working with a broad spectrum of community stakeholders, neighborhood residents and local elected officials has developed a comprehensive planning and rezoning strategy to foster and frame future development in St. George . . . civic center of Staten Island.” *New York City Planning*: https://www1.nyc.gov/assets/planning/download/pdf/plans/st-george/st_george.pdf

“The proposal has the following goals: to build upon St. George’s existing strengths as a civic center, neighborhood . . . by providing rules that will bolster a thriving, pedestrian-friendly, business and residence district; to establish zoning regulations that facilitate continuous ground floor retail and the critical mass needed to attract a broader mix of uses; to require a tall, slender, building form that reflects its hillside topography and maintains waterfront vistas; to encourage the reinvestment and reuse of vacant office buildings; to accommodate an appropriate level of off-street parking while reducing its visual impact. <https://www1.nyc.gov/assets/planning/download/pdf/about/cpc/080425.pdf>

“On September 10, 2008, the (New York) City Planning Commission approved the actions with the following modifications to the *Special St. George District*: additional landscaping requirements have been added to the proposal in order to ensure that there are not wide areas of hard surface between the sidewalk and a residential building that is set back from the street line. Specifically, the area of the zoning lot between the street wall and the street line (or sidewalk widening line) of a building will be required to be planted where the ground floor use is residential, except for entrances and exits. Commercial uses fronting on the street will be exempt from this requirement.

“Also, in order to ensure that the tops of point towers are articulated on all sides so they are read as “towers- in-the-round”, the text was modified to require setbacks on each side of a point tower, in a manner that maintains design flexibility. Under the current proposal, tower top articulation can be achieved by a single setback on only one side of the tower.

“The original proposal allowed a base height of 30-60 ft in most of the district. The text was modified to require a base height of 30-40 ft for developments that include a tower. The proposed Bay Street base heights will remain the same at 60-85 ft to reflect the context of that particular street. A taller base height will be permitted for those projects that do not include a tower. This modification will allow additional light, air and potential waterfront

views at the street level due to the unique topography in St. George.”

https://www1.nyc.gov/assets/planning/download/pdf/plans/st-george/st_george.pdf

“The rezoning plan, which was quickly approved by the City Council and the City Planning Commission, will allow developers to erect 20-story residential buildings and convert empty office buildings into apartments located within a 10-block area of St. George. . . .” Platt, Tevah, “Rezoning Plan for Staten Island’s St. George Section Celebrated”, *Staten Island Advance*, December 4, 2008. https://www.silive.com/northshore/2008/12/rezoning_plan_for_staten_islan.html?ampredir=true

The most important decision that the current members of the NYC Planning Commission have to make is whether or not the impact of the applicant’s zoning requests for the *Special St. George District*, which are part of the *River North* application, are correctly evaluated. The applicant’s Draft Environmental Impact Statement does not address any of the adverse effects of these zoning changes on the *Special St. George District* at all.

One of the adverse effects not addressed in the applicant’s Draft Environmental Impact Statement is public school overcrowding. Neither the required pre-school or elementary school information is provided.

The CEQR Technical Manual states, “The latest available data on enrollment, capacity, available seats, and utilization rates for all elementary and middle schools within the sub-district study area should be provided, including any, Mini- Schools, and Annexes that are part of these school organizations. Enrollment, but not capacity, of Transportable Classroom Units (TCUs) should also be provided.” CEQR Technical Manual p. 6-8.

https://www1.nyc.gov/assets/oec/technical-manual/2020_ceqr_technical_manual.pdf

Rather, the applicant’s River North DEIS states, “The Proposed Actions would not result in a significant adverse impact to community facilities and services. A preliminary analysis of publicly-funded child care, public schools, and health care and fire/police protection were not warranted for the Proposed Actions. With the Proposed Actions, the public schools utilization rate would operate at less than 100 percent, and the utilization rate would not increase by more than five percent for either elementary or intermediate public schools.” River North DEIS E-18. <https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-deis.pdf>

However, other information indicates that the public elementary schools that are zoned for the projected River North neighborhood are already over-capacity:

1. PS 10, the Fort Hill Collaborative School Tompkinsville is at 154 percent capacity.
2. PS 16 with an Enrollment 522 and a Target Capacity 515, is at 101 percent capacity.
4. PS 74 was at 138 percent capacity.

5. PS 18 in West Brighton was at 102 percent capacity. It had an enrollment of 573 and a Target Capacity of 563. Knudson, Annalise, School Capacity Report: Is Your Child's Elementary School Building Overcrowded? *Staten Island Advance*, April 22, 2019. <https://www.silive.com/news/g66l-2019/04/59bbf58eb7301/school-capacity-report-is-your-childs-elementary-building-overcrowded.html>

No information on existing publicly funded early childhood programs within the area, as required by the CEQR Technical Manual, was provided. CEQR Technical Manual pp. 6-11. https://www1.nyc.gov/assets/oec/technical-manual/2020_ceqr_technical_manual.pdf

Both the *River North* project, and the zoning amendments that the applicant is seeking relative to the *Special St. George District*, run counter to the decades of work that has been done by NYC planning agencies to preserve the character of St. George and the quality of life of the residents of the neighborhood. Somma-Hammel, Jan, "St. George: Then, Now, and What's Coming in the Future", April 11, 2017. *Staten Island Advance*. https://www.silive.com/seen/2017/04/st_george_then_now_and_whats_t.html

The *catch phrase*, or *brand*, "affordable housing", is currently bandied about. It can be misused to mentally mitigate the adverse effects of the proposed escalating allowable housing density in the *Special St. George District*.

The zoning changes that are requested in this instance have the potential adverse effect of inflating the price of North Shore Staten Island property, but without any guarantee that a single dwelling will be built to satisfy any particular housing demand, while at the same time increasing costs for renters, home buyers, and occupants of retail space, and in doing so, making St. George "unaffordable".

There is no substantial case for granting this zoning map change, these zoning text amendments, and these further permits, to build out of context buildings of 25 and 26 stories in height on property currently located in *Special Hillside Preservation District* and R6 zoning. There is no pressing need to use this particularly unsuitable site for such buildings, when the following reasonable alternatives exist.

REASONABLE ALTERNATIVES

I.

There are already at least three reasonable alternatives for NYC's housing goals in the North Shore neighborhoods of Staten Island, rather than removing the protections of the *Special Hillside Preservation District*, and the eviscerating the *Special St. George District* protections.

The first reasonable alternate for housing, is the 10-block area of the *Special St. George District*, as it now exists, that allows new 20-story mixed-use buildings and the re-purposing of vacant commercial buildings for residential use:

a. According to an April 23, 2021 article in the *Staten Island Advance*, a parcel of land is currently for sale in the *Special St. George District*: “Vacant property in St. George – up for sale for \$12.5 million – is being marketed with plans for a 20-story residential tower targeting middle-income families. The approximately 1-acre site is up to 20 stories high. While the site is an assemblage of several land parcels, the property is being marketed with the address of 124 Central Ave.” Porpora, Tracey, “For sale: \$12.5M St. George site with plans for a 20-story residential building,” *Staten Island Advance*, April 23, 2021. <https://www.silive.com/news/2021/04/for-sale-125m-st-george-site-with-plans-for-a-20-story-residential-building.html>

b. “One of Staten Island’s tallest buildings will soon be built in St. George, according to the Realtor who just brokered a \$9.5 million sale of a 37,000-square-foot, L-shaped parking lot to international investors who plan to build a high-rise there . . . Schneider estimated that the high-rise could include between 140 to 180 residential units with lower-level commercial operations and parking.” Porpora, Tracey “One of Staten Island’s Tallest Buildings to be Built in St. George on \$9.5M lot, says Real Estate Broker”, *Staten Island Advance*, January 23, 2015, https://www.silive.com/northshore/2015/01/staten_islands_tallest_buildin.html

II.

The second reasonable alternative to create housing opportunities is to utilize 14-block area of *The Bay Street Corridor* that was established two years ago in 2019. This zoning area is directly next door to the *Special St. George District*. It can be viewed at the New York City Department of City Planning Map at:

<https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-maps/map21c.pdf>

The *Special Bay Street Corridor District* (BSC) along Bay Street that is bounded by Victory Boulevard, Van Duzer Street, the Staten Island Rail tracks, and Sands Street, “was created to foster better connectivity between Staten Island’s civic core in St. George and the town center of Stapleton by promoting a more continuous, pedestrian friendly commercial streetscape and create the opportunity for additional housing on the North Shore.”

<https://www1.nyc.gov/site/planning/plans/bay-street-corridor/bay-street-corridor.page>

As Commission Lago was quoted as saying at the time, “Imagine the *Bay Street Corridor* that stretches from St. George to Stapleton as a walkable, vibrant live-work-play community that supports jobs and, for the first time, housing, including affordable housing,’ . . . ‘As we

begin the public review of the *Bay Street Corridor Neighborhood Plan*, we want to hear from Staten Islanders about their vision for an even better North Shore for themselves, their children and grandchildren.” Porpora, Tracey, Public Review of Bay Street Corridor Affordable Housing Plan Launched, *Staten Island Advance*, November 13, 2018. <https://www.silive.com/news/2018/11/public-review-launched-of-bay-street-corridor-affordable-housing-plan.html>

Would the applicant’s requested zoning changes to the *Special St. George District* be in direct competition with the *Bay Street Corridor*, which “is expected to bring 6,500 new residents to the North Shore in addition to 1,800 mixed income apartments”? Kashiwagi, Sydney, “City Council approves Bay Street Corridor Rezoning; Matteo, Borelli only city council members to oppose plan”, *Staten Island Advance*, June 26, 2019. <https://www.silive.com/news/2019/06/city-council-approves-bay-street-corridor-rezoning-matteo-borelli-only-2-councilmen-to-oppose-plan.html>

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“On April 22, 2019, the City Planning Commission voted to approve the application, with six Commissioners and the City Planning Chair and Vice Chair voting in favor. Three Commissioners, including Commissioner Cerullo appointed by the Staten Island Borough President, Commissioner Marin appointed by the Bronx Borough President, and Commissioner Rampershad appointed by the Queens Borough President, voted against it.

“The Commission’s view is that in facilitating the Neighborhood Plan, the proposed zoning actions are a unique opportunity to “spur new housing development, including permanently affordable housing and housing for seniors, promote economic development by providing opportunities for commercial and community facility uses, create a more vibrant Corridor by tailoring zoning regulations that include active ground floor uses, and promote opportunities for public (access) along the waterfront.” Gray, Viktoriya, “Major Staten Island Project OK’d by City Planning Despite Significant Opposition; City Council Up Next, CITYLAND, New York City Land Use News and Legal Research, May 14, 2019. <https://www.citylandnyc.org/major-staten-island-project-approved-by-city-planning-despite-significant-opposition-city-council-up-next/>

The Mayor's Office view was, that "The Bay Street Neighborhood Plan exemplifies our mission to be the 'Fairest Big City.'" Deputy Mayor Housing and Economic Development Vicki Been. <https://www1.nyc.gov/office-of-the-mayor/news/320-19/mayor-de-blasio-council-member-rose-celebrate-adoption-bay-street-neighborhood-rezoning>

III.

The third reasonable alternative to providing housing on Staten Island's North Shore is the re-zoned North Shore city-owned waterfront properties. The "*Special Stapleton Waterfront District* (NYC Department of City Planning 2006) consists of the 35-acre Homeport site and eighteen lots west of Front Street and east of the Staten Island Rapid Transit (SIRT) line. . . . The Staten Island Rail commuter train has three stations serving the area: Tompkinsville Station to the north, Stapleton Station at the heart of the site, and Clifton Station to the south. The St. George Ferry Terminal is a five-minute train ride away. <https://www1.nyc.gov/assets/planning/download/pdf/plans/stapleton/stapleton.pdf>

Seven months ago, on December 18, 2020, the New York City Department of Housing Preservation and Development (HPD) requested proposals to develop 100 percent affordable housing on a City-owned lot in the *Special Stapleton Waterfront District*. New York City Housing Preservation and Development. <https://www1.nyc.gov/site/hpd/services-and-information/stapleton-rfp.page>

Considering this information, can each member of the NYC Planning Commission vote to approve the applicant's request for zoning changes, which undo decades of NYC Planning, when the North Shore of Staten Island has already been re-zoned several times in the past 15 years to specifically facilitate housing and economic development?

As NYC planners concluded almost thirty years ago in 1992, "North Shore Staten Island Redevelopment should respect the site's topography and historic structures." Department of City Planning NYC DCP 92-27. http://www.deltacityofthefuture.nl/documents/NYC_comprehensive_waterfront_plan.pdf

Priority Mail to:
CITY PLANNING COMMISSION
Calendar Information Office
120 Broadway - 31st Floor,
New York, NY 10271

July 14, 2021

Calendar Nos. 47, 48, 49

Borough: Staten Island

ULURP Nos. N210281 LDR, C210289 ZMR, N210290 ZRR, C210291 ZSR

Project Identification CEQR No. 20DCP140R

CD No. 1

I, Helen Northmore, respectfully request each of the current members of the New York City Planning Commission to vote no on each of the applicant's (Richmond SI Owner, LLC) requests for a zoning map amendment relating to the *Special Hillside Preservation District*, R-6, and *Special St. George District* designations, zoning text amendments to the *Special St. George District*, and special permits.

Public Hearing Calendar No. 49 C 210291 ZSR

Comments on the applicant's request for a special permit to modify: rear yard requirements, obstruction requirements, height and setback requirements, and planting requirements on the lots mapped in the applicant's request, i.e., among others, lots that extend from Stuyvesant Place to Nicholas Street along Richmond Terrace.

Is this a valid application? According to a review of the latest NYC Department of Finance Records, the applicant, Richmond SI Owner LLC, has mapped other owners' properties in this application. The applicant's property consists only of three of the eleven lots included in the application. They are Block 13, Lots 82, 92, and 100.

The *Special Hillside Preservation District* regulations state, "Notwithstanding the provisions of Section 78-06 (Ownership), a zoning lot having an average percent of slope of 10 percent or greater which is the subject of an application under this section may include adjacent properties in more than one ownership, provided that the application is filed jointly by the owners of all the properties included. Any subdivision of the tract before, during or after development shall be subject to the provisions of Section 78-51 (General Provisions)" 119-03. <https://zr.planning.nyc.gov/article-xi/chapter-9>

Current NYC Department of Finance records show that the following lots as mapped in this application are not owned by the applicant:

Block 12, Lot 1 is owned by E&V Staten Island LLC., 140 Stuyvesant Pl. SI, NY 10301.

Block 13, Lot 8 is owned by Castleton Preservation Housing Company, Inc., 165 St. Marks Place, Staten Island, NY 10301.

Block 13, Lot 60 is owned (1/26/18) by AAB 224 Richmond Terrace LLC., 224 Richmond Terrace, Staten Island, NY 10301.

Block 13, Lot 68 is owned (11/24/20) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 71 is owned (1/20/21) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 73 is owned (11/24/2020) by Economic Development Opportunity Zone Fund I, LLC., 28 Village Road North, Suite 3R, Brooklyn, NY 11223-3838.

Block 13, Lot 116 (12/12/2008) is owned by Borok Holding Company, LLC, 41 Hamilton Ave., SI, NY 10301.

Block 13, Lot 119, is owned by (individual person), 41 Hamilton Avenue, SI, NY 10301.
<https://a836-pts-access.nyc.gov/care/forms/htmlframe.aspx?mode=content/home.htm>

If this a joint application by the multiple owners of all the other lots that are included in this request for zoning changes, why is Richmond SI Owner, LLC the only property owner listed in the application?

There is no substantial case for granting these further permits, to build out-of-context buildings of 25 and 26 stories in height on property designated as *Special Hillside Preservation District* and R6 zoning. There is no pressing need to use this particularly unsuitable site for such buildings when there are reasonable alternatives such as the following.

REASONABLE ALTERNATIVES

I.

There are already at least three reasonable alternatives for NYC's housing goals in the North Shore neighborhoods of Staten Island, rather than removing the protections of the

Special Hillside Preservation District, and the *Special St. George District* from these lots amounting to about 2.2 acres.

The first reasonable alternate for housing, is the 10-block area of the *Special St. George District*, as it now exists, that allows new 20-story mixed-use buildings and the re-purposing of vacant commercial buildings for residential use:

a. According to an April 23, 2021 article in the *Staten Island Advance*, a parcel of land is currently for sale in the *Special St. George District*: “Vacant property in St. George -- up for sale for \$12.5 million -- is being marketed with plans for a 20-story residential tower targeting middle-income families. The approximately 1-acre site is up to 20 stories high. While the site is an assemblage of several land parcels, the property is being marketed with the address of 124 Central Ave.” Porpora, Tracey, “For sale: \$12.5M St. George site with plans for a 20-story residential building,” *Staten Island Advance*, April 23, 2021. <https://www.silive.com/news/2021/04/for-sale-125m-st-george-site-with-plans-for-a-20-story-residential-building.html>

b. “One of Staten Island's tallest buildings will soon be built in St. George, according to the Realtor who just brokered a \$9.5 million sale of a 37,000-square-foot, L-shaped parking lot to international investors who plan to build a high-rise there . . . Schneider estimated that the high-rise could include between 140 to 180 residential units with lower-level commercial operations and parking.” Porpora, Tracey “One of Staten Island's Tallest Buildings to be Built in St. George on \$9.5M lot, says Real Estate Broker”, *Staten Island Advance*, January 23, 2015, <https://www.silive.com/northshore/2015/01/staten-islands-tallest-buildin.html>

II.

The second reasonable alternative for creating housing opportunities is to utilize 14-block area of *The Bay Street Corridor* that was established two years ago in 2019. This zoning area is directly next door to the *Special St. George District*. It can be viewed at the New York City Department of City Planning Map at:

<https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-maps/map21c.pdf>

The *Special Bay Street Corridor District* (BSC) along Bay Street that is bounded by Victory Boulevard, Van Duzer Street, the Staten Island Rail tracks, and Sands Street, “was created to foster better connectivity between Staten Island’s civic core in St. George and the town center of Stapleton by promoting a more continuous, pedestrian friendly commercial street scape and create the opportunity for additional housing on the North Shore.”

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As Commission Lago was quoted as saying at the time, “Imagine the *Bay Street Corridor* that stretches from St. George to Stapleton as a walkable, vibrant live-work-play community that supports jobs and, for the first time, housing, including affordable housing,’ . . . ‘As we begin the public review of the *Bay Street Corridor Neighborhood Plan*, we want to hear from Staten Islanders about their vision for an even better North Shore for themselves, their children and grandchildren.” Porpora, Tracey, Public Review of Bay Street Corridor Affordable Housing Plan Launched, *Staten Island Advance*, November 13, 2018. <https://www.silive.com/news/2018/11/public-review-launched-of-bay-street-corridor-affordable-housing-plan.html>

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As the Commissioners may remember, “On February 27, 2019, the City Planning Commission held a public hearing on the application, at which 13 speakers spoke in favor and 23 spoke in opposition. The speakers in opposition, which included not only area residents but representatives of City-wide civic groups and labor unions, expressed concerns over infrastructure, open space, school capacity, affordability of housing for existing area residents and resident displacement, and flood resiliency. Speakers in support, which largely included representatives of the City agencies that contributed to the Bay Street Neighborhood Plan, discussed ongoing efforts to prepare the area for future development, including planned infrastructure improvements, economic development programs, preservation and creation of affordable housing, transportation improvements, and open space commitments.

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“The Commission’s view is that in facilitating the Neighborhood Plan, the proposed zoning actions are a unique opportunity to “spur new housing development, including permanently affordable housing and housing for seniors, promote economic development by providing opportunities for commercial and community facility uses, create a more vibrant Corridor by tailoring zoning regulations that include active ground floor uses, and promote opportunities for public (access) along the waterfront.” Gray, Viktoriya, “Major Staten Island Project OK’d by City Planning Despite Significant Opposition; City Council Up Next, CITYLAND, New York City Land Use News

and Legal Research, May 14, 2019. <https://www.citylandnyc.org/major-staten-island-project-approved-by-city-planning-despite-significant-opposition-city-council-up-next/>

The Mayor’s Office view was, that “The Bay Street Neighborhood Plan exemplifies our mission to be the ‘Fairest Big City.’” Deputy Mayor Housing and Economic Development Vicki Been. <https://www1.nyc.gov/office-of-the-mayor/news/320-19/mayor-de-blasio-council-member-rose-celebrate-adoption-bay-street-neighborhood-rezoning>

III.

The third reasonable alternative to providing housing on Staten Island’s North Shore is the re-zoned North Shore city-owned waterfront properties. The “*Special Stapleton Waterfront District* (NYC Department of City Planning 2006) consists of the 35-acre Homeport site and eighteen lots west of Front Street and east of the Staten Island Rapid Transit (SIRT) line. . . The Staten Island Rail commuter train has three stations serving the area: Tompkinsville Station to the north, Stapleton Station at the heart of the site, and Clifton Station to the south. The St. George Ferry Terminal is a five-minute train ride away. <https://www1.nyc.gov/assets/planning/download/pdf/plans/stapleton/stapleton.pdf>

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The requested changes dismantle decades of NYC Planning work. The North Shore of Staten Island has already been re-zoned several times in the past 15 years to specifically facilitate housing and economic development. Considering this information, can each member of the NYC Planning Commission approve these requests for zoning changes relating to: the *Special Hillside Preservation District*, R-6, and *Special St. George District* designations; and in doing so, take responsibility for the adverse effects inflicted by these changes on the people in the neighborhoods of the North Shore of Staten island?

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Saturday, July 10, 2021 2:43:13 PM
Attachments: [pdf Comments July 14, 2021 NYC Planning Commission Hearing.pdf](#)

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Helen Northmore**
Zip: **10301**

I represent:
• **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **Yes**
If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:
Yes

Additional Comments:

Is there a question of whether or not the applicant has provided adequate information for the Commissioners to assess the full effects of the requested zoning changes? According to the CEQR Technical Manual 2020, "The purpose of the DEIS is to disclose and discuss potential significant adverse environmental impacts so that a decision-maker may understand them and their context." https://www1.nyc.gov/assets/oec/technical-manual/01_Procedures_and_Documentation_2020.pdf It further states, "A change in regulatory controls applying to a small area may allow a range of development scenarios to occur. Examples that fall within this category include: Rezoning of a block or several blocks;

or . . . Zoning text amendment(s) or changes to Special Districts affecting a limited number of geographic areas. “These types of projects affect an area larger than an individual project site and have different environmental implications from site-specific projects. If approved, the change in regulations would allow development of a new type, use, form, or density on sites other than the project site, and future development on those sites would likely be able to proceed without the need for further CEQR review. “Establishing the analysis framework for these types of projects involves developing a RWCDs that captures the upper range of development that would likely occur on both the project site and area affected by the project.”

[https://www1.nyc.gov/assets/oec/technical-](https://www1.nyc.gov/assets/oec/technical-manual/02_Establishing_the_Analysis_Framework_2020.pdf)

[manual/02_Establishing_the_Analysis_Framework_2020.pdf](https://www1.nyc.gov/assets/oec/technical-manual/02_Establishing_the_Analysis_Framework_2020.pdf) The River North Draft

Environmental Impact Statement does not mention the effects of all these requested zoning changes on the area of the Special St. George District. A change to a denser FAR of 6 in the 10-12 block area would mean the possibility of large-scale growth similar to the re-zonings of Long Island City and Downtown Brooklyn. See: A Tale of Two Rezoning; Taking a Harder Look at CEQR, The Municipal Arts Society, 2018, 75 pages, p. 4.

<https://www.mas.org/news/a-tale-of-two-rezonings-ceqr/> In fact, the River North DEIS states, “The Proposed Actions would increase the zoning capacity in the area of Block 13 within 185 feet of Richmond Terrace and Stuyvesant Place, and would not increase zoning capacity outside of this area.” River North DEIS p. E-37.

[https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-](https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-deis.pdf)

[deis.pdf](https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-deis.pdf) The River North DEIS states, “. . . the Proposed Actions would create land uses or structures that would neither be incompatible with the underlying zoning, nor conflict with public policies applicable to the Study Area.” River North DEIS p. E-16

[https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-](https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-deis.pdf)
[deis.pdf](https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-deis.pdf) Even, the applicant’s site specific study area is open to question. It is described as, “Being on a peninsula near the northeastern edge of Staten Island, the area within 0.5-miles of the Project Area is approximately 50 percent waterbodies. The Study Area established by CEQR methodologies therefore reflects a population density and population less than other inland areas of the St. George neighborhood, and inflates the socioeconomic effects of the Proposed Actions.” River North DEIS p, E-18.

[https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-](https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-deis.pdf)
[deis.pdf](https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/liberty-towers/00-deis.pdf) Attached are my comments to the Commissioners regarding this requested zoning for the July 14, 2021 Hearing. On June 23, 2021, I submitted my 55-page long commentary on the Richmond SI Owner LLC River North DEIS.

From: [Helen Northmore](#)
To: [Annabelle Meunier \(DCP\)](#)
Cc: [20DCP140R_DL](#); [James Oddo](#); [Carroll, Joseph \(CB\)](#); [Deborah Rose](#); [borelli-council](#); [Steven Matteo](#); [lanza@nysenate.gov](#); [Savino@nysenate.gov](#); [fallc@nyassembly.gov](#); [CusickM@nyassembly.gov](#); [reillym@nyassembly.gov](#)
Subject: Re: Please Acknowledge Receipt or Lack Thereof
Date: Tuesday, July 13, 2021 8:49:20 PM

Will they be shared with the NYC Planning Commissioners and Chair, before they possibly vote tomorrow on any zoning changes requested by Richmond SI Owners, LLC?

On Tue, Jul 13, 2021 at 9:08 AM Annabelle Meunier (DCP)
<AMEUNIER@planning.nyc.gov> wrote:

Good morning, M. Northmore,

Writing to acknowledge receipt of the comments emailed, as well as those mailed to our office. The comments have been shared with the applicant team and will be responded to in the Final Environmental Impact Statement.

Thank you,

ANNABELLE MEUNIER

TEAM LEADER • ENVIRONMENTAL ASSESSMENT & REVIEW DIVISION

NYC DEPT OF CITY PLANNING

120 BROADWAY, 31ST FLOOR • NEW YORK, NY 10271

ameunier@planning.nyc.gov

www.nyc.gov/planning

From: Helen Northmore <hbayernorthmore@fordham.edu>
Sent: Wednesday, June 30, 2021 2:46 PM
To: 20DCP140R_DL <20DCP140R_DL@planning.nyc.gov>
Cc: James Oddo <joddo@statenilandusa.com>; Carroll, Joseph (CB) <JCarroll@cb.nyc.gov>; Deborah Rose <drose@council.nyc.gov>; borelli-council

<borelli@council.nyc.gov>; Steven Matteo <smatteo@council.nyc.gov>;
lanza@nysenate.gov; Savino@nysenate.gov; fallc@nyassembly.gov;
CusickM@nyassembly.gov; reillym@nyassembly.gov
Subject: Please Acknowledge Receipt or Lack Thereof

June 30, 2021

Dear Ma'am or Sir:

On June 23, 2021 I submitted, to this email address as directed by the DCP website, my comments on

River North (formerly Liberty Towers) DEIS
Project Identification
CEQR No. 20DCP140R
ULURP Nos. 210289 ZMR, N210290 ZRR, 210291 ZSR SEQRA Classification: Unlisted

As of today, I have not received any electronic acknowledgment of the receipt of the June 23rd email with attached comments.

As it is the custom for a public agency to promptly acknowledge receipt of electronic communications, I am concerned that there is a glitch in the process. Therefore, I am again writing to you today and attaching the comments that I sent last week.

Please respond as to whether or not your agency has received that email and today's.

In the meantime last week I sent hard copies of my comments on the River North DEIS to both Director Lago, NYC DCP and Director Abinader,

DCP Environmental Assessment and Review Division

Thanking you in advance,

Sincerely,

Helen Northmore

hbayernorthmore@fordham.edu

From: [Helen Northmore](#)
To: [20DCP140R_DL](#)
Subject: River North DEIS
Date: Wednesday, June 23, 2021 1:31:10 PM
Attachments: [pdf 23621 DCP River North DEIS 20DCP140R.pdf](#)

June 23, 2021

Dear Ma'am or Sir,

Attached please find a pdf containing my comments on the River North DEIS.

Thank you,
Helen Northmore

Good afternoon, Commissioners. My name is Ben Donsky; I am an urban planner but I am here today as a Staten Island resident concerned with both long-term housing affordability and protecting our environment, I am strongly in favor of the River North proposal.

While some Staten Islanders like to think that our relative geographical isolation translates to being insulated from the city's larger economy, it's simply not the case. It is increasingly difficult for young families like mine to afford to live here. Families are priced out of apartments with multiple bedrooms because roommates with two incomes and no kids can afford to pay more. The problem on the North Shore is particularly acute because it's the part of the island most impacted by rising rents in Manhattan and Brooklyn. While this project wouldn't solve our housing shortage by itself, it is part of a much larger solution not only for the borough but for the entire city.

We also need to relieve pressure to develop wetlands and environmentally sensitive areas in Staten Island, and concentrating residential density near major public transit facilities, like River North does, will help begin to correct the unsustainable course we are on.

I'm the owner of a two-unit house in walking distance of a Staten Island Railroad stop. The second unit is a one-bedroom apartment. While increasing the number of transit-accessible one-bedroom apartments is contrary to my immediate personal financial interests, I'd like my kids to be able to afford to live nearby when they become adults, and recognize the importance of project like this for the greater community.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Thursday, July 15, 2021 8:27:55 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Susan Fowler**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

Staten Island isn't Manhattan and the City needs to respect our zoning rules--we don't need to build up, we have space for one- and two-family houses and small apartment blocks. Also, we don't need to kill more trees and pave over our green areas. Finally, look at the other high-density projects on SI--Urby, the hotel/condos at the ferry, the Cassandra apartments on Richmond Terrace. Demand is low and the buildings do not fill up quickly. The new apartments will be dead spots. The infrastructure isn't there--aside from poor storm sewers and school seats, there will be no shops, no playgrounds, no comfortable places to sit and talk.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 11:02:24 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **STEVEN COLANTONI**
Zip: **10314**

I represent:

- **Myself**

Details for "I Represent": **R-7 Zoning on Staten Island.**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

Staten Island and its residents enjoy the suburban atmosphere on Staten Island. That is why we chose to live here. Infrastructure on the island is already overloaded. To allow this would make things even worse.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 10:11:21 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Sarah Gowell**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

We on Staten Island north shore do not need. ANY 26 story buildings the 13 story building by the ferry is in limbo and the Empire Outlets and the wheel have been a disaster Please reconsider this is a mistake Who is supposed to live there? The people who take the fast ferry I don't think so this too is a mistake The developers have also not considered parking and infrastructure for such a large project **NO**

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 9:51:40 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Jake Knoll**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

Transit oriented development at a major commuting hub is an important step for Staten Island and our city. Creating more housing a 25 min trip from downtown Manhattan is crucial. If we create more housing in low density Staten Island it will lift displacement pressures on lower income NYC communities. It is also crucial for our climate goals that we build a lot more dense transit oriented development.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 9:29:44 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Richard Walters**
Zip: **10304**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

It is senseless to add another high density building to an already very congested area without addressing the issues with the poor existing infrastructure in that area.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 9:16:14 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Nina Long**
Zip: **10310**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

I am against this project as I feel it is not appropriate for our borough.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 8:23:01 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Ed Wiseman**
Zip: **10306**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

We have seen the results of higher density housing and commercial projects make our roads less safe, negatively affect the climate (with greater vehicular congestion), and reduce the quality of life rather than improve it. Projects look good on paper but the unintended consequences are often overlooked. In addition, a hidden truth is that combination of tolls, density, and poor infrastructure raises everyday prices and makes the Island less affordable for those who have fewer advantages. We provide affordable housing as we artificially force up the cost of living for the underserved communities we are trying to serve. This project specifically inflates costs and congestion in an area that needs breathing room and affordable quality to make life better. Overbuilding and shoehorning in a few affordable units does not

address the underserved or quality of life.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 1:04:37 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **shana oleary becherini**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

it's a very bad idea ...

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 12:49:49 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **aoife oleary**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

Sorry, but the idea is totally crazy ...

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 12:48:42 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **katie oleary becherini**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

Sorry, but the idea is totally crazy ...

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 12:47:32 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **karen oleary becherini**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project?
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

Additional Comments:

Sorry, but the idea is totally crazy ...

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Thursday, July 15, 2021 1:03:31 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **DAVID LONG**
Zip: **10314**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

26 story building is wrong for Staten Island.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenlandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 12:45:31 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **caoimhe oleary**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project?
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

Additional Comments:

Sorry, but the idea is totally crazy ...

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 12:43:58 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **lylyanna oleary**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project?

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

Additional Comments:

Sorry, but the idea is totally crazy ...

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 12:42:29 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **fabio becherini**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

Sorry, but the idea is totally crazy ...

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); [statenilandcomments_dl@planning.nyc.gov](#)
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 11:57:19 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **KIMBERLY BUTLER-GILKESON**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent": **I am a private citizen who resides directly next to the proposed building site.**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

Additional Comments:

This is a horrible idea. It will crush any light or view that the current homeowners on Hamilton Ave have. The apartment building across the street from it will suffer from the strain on neighborhood resources. The parking situation in the neighborhood is currently tight and will become non existent. The parking during construction of this monstrosity will likely erupt into fist fights. If this building could be a 1/3 of its current proposal it might get some traction but as it is written now, it is not sustainable for the St. George neighborhood.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 10:33:26 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Jarrett Macek**
Zip: **10011**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

This development will help alleviate housing costs by providing new units next to an accessible area.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 10:32:36 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Kathleen Harris**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent": **The applicant should build based on the current zoning**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

No skyscrapers on Staten Island. Once this is approved, all of the shores of SI will have skyscrapers and this will destroy SI.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 10:00:42 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Julie O'Brien**
Zip: **10310**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

Area is too congested already!!!

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 9:25:40 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Latasha Collo**
Zip: **10314**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

I don't believe that the zoning should be changed, especially across from single family homes. That doesn't make any sense.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 7:40:05 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Dan Miller**
Zip: **11216**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

I'm writing to support this project. New York is in a serious crisis of inadequate housing supply, and we need more construction to fill the gap. The city built fewer homes in the roaring economy of the 2010s than it did in the 1970s, when it was shedding jobs and population. This low level of construction leads directly to the soaring rents and overcrowding that are making New York a less welcoming place. NYC should be for anyone who wants to live here; but by building so little, we've ensured that it's only for the rich. This project would allow more people to access this amazing city, to live in its cultural richness and low environmental impact and prosperity. New York needs more housing; build this project and we'll be one step closer to getting it.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 6:46:32 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **robert barberesi**
Zip: **10306**

I represent:

- **Myself**

Details for "I Represent": **for the good of staten island**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **Yes**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

This zoning change will make getting around by the staten is. ferry impossible. Staten is. streets were not made for an enormous amount of traffic. You cannot configure the streets to accept this amount of traffic and people. the only people that will benefit are the housing contractors. There are only a few if any buildings on staten si. that are that tall. please understand that staten is. is not a high density borough. Not in my neighborhood, sound familiar but this time that saying is right

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Thursday, July 15, 2021 12:35:06 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Karen Gannon**
Zip: **10302**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

PLEASE, NO! So many poor choices have been made for Staten Island, especially on the North Shore, where I live. Please do not permit another mistake with this project!

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 5:44:11 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Peter Nacionales**
Zip: **10308**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

Staten Island does not need high rise buildings, our population is already straining the infrastructure as it sits today. What needs to be commissioned is a study for modern transportation facilities and reworking the roadways with proper signage and parking regulations so the traffic can freely flow and alleviate congestion that is an everyday occurrence.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 5:41:54 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Mohammed Ali**
Zip: **10461**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

The city desperately needs more housing so that market rates can come down. I specifically don't support "affordable housing" because despite it's branding affordable housing is nothing more than a special privilege (greater than homeownership) for a handful of lottery winners at the expense of everyone else, and has the effect of making market rate development more difficult.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 5:01:20 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Brian Crandall**
Zip: **12203**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

This project provides critically needed housing to Staten Island in a location with comparatively easy access to services and jobs. Liberty Towers provides respectful density with a lower carbon footprint than a comparable greenfield project further south on the island. I am in complete support of this proposal.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 4:57:25 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Trevor Levin**
Zip: **11211**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

We're in a housing emergency. According to the Where We Live report, published just before the pandemic, 25% of New Yorkers were then spending over 50% of their incomes on housing. Rents dipped due to covid-related vacancies, but they're coming back. We need more units of all kinds to keep people in this city, for our communities, our tax base, and the climate. This project in particular will enable hundreds of workers to commute car-free to Manhattan or within the North Shore. This is exactly the kind of project we need to meet our climate goals and keep the city livable both through the roaring rents of the 2020s and through the climate disasters to follow.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); [statenilandcomments_dl@planning.nyc.gov](#)
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 4:31:11 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Dylan Kennedy**
Zip: **10463**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

I am living with my parents despite graduating and getting a job. Rent in this city is so expensive and we have been driving rents higher by blocking so many housing developments. Ideally this building would be 100% affordable, but for every wealthy person who moves into one of the nice market rate apartments, that frees up spots for the rest of us elsewhere. I have been looking for apartments and it is brutal right now. Additionally development near transit like the ferry is good. Building near that means people don't need a car to go to work and is part of a safer, quieter, and more sustainable city. Additionally apartment buildings are more sustainable than smaller single family houses, even without considering commuting.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 4:22:33 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Joseph Rosinski**
Zip: **10552**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

River North will provide 750 new transit-oriented, environmentally-friendly residential units that are vital for the continued growth of Staten Island, and to increase the supply of housing. We have been in a citywide housing crisis for years, with extraordinarily high rent as a result demand far exceeding supply. Increasing the supply of housing is critical for meeting continually increasing demand, and for keeping housing costs manageable for all NYC residents. These are environmentally-friendly apartments that will provide much-needed housing to Staten Island, and will not result in roads being clogged with more cars since these apartments are transit-oriented.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 4:01:47 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Yann Kiraly**
Zip: **10036**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

I would like to voice my support for this (and similar) projects since they are the quickest way to reduce market rent in a sustainable manner.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 3:49:59 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **BILL WILKENS**
Zip: **10306**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:

Additional Comments:

Staten Island will be destroyed if this type of zoning is allowed

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 3:42:54 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Maureen Harmon**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent": **I do not think Staten Island especially the north shore has the infrastructure to support this type of development. I feel this would also deteriorate the quality of life on Staten Island. Our roads do not support this, public transportation does not support this, schools and overall resources for the community.**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

I do not think Staten Island especially the north shore has the infrastructure to support this type of development. I feel this would also deteriorate the quality of life on Staten Island. Our roads do not support this, public transportation does not support this, schools and overall resources for the community

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 3:32:07 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Michael Mattia**
Zip: **10312**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

Staten Island has long been overlooked for infrastructure improvements by the City of New York. The last project our borough needs are high rise apartment buildings. The position that the proximity to the ferry service to Manhattan just does not out weigh the fact that a project of this size and scope will increase traffic across the Island bridges and ultimately on our already antiquated streets and thoroughfares. Please do not approve this project. It will become another stressor on the already decreasing quality of life on our island. Thank you for your consideration.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 5:56:13 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Ryan Castellano**
Zip: **11216**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

This is so obvious, but anyone who cares about housing costs needs to take supply and demand seriously. This is a serious proposal that would marginally help the problem, and its proximity to the Staten Island ferry makes this a very economically productive location in which we should allow as many people to live as we reasonably can.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 3:28:09 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Gail Decker**
Zip: **10312**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

I am a lifelong Staten Islander and I have seen firsthand how over-development has made this borough overcrowded and extremely tough to get around. The thought of several high rise towers in St. George at the River North project is frustrating. The infrastructure can barely handle what is already there let alone take on several high rise towers. Please do not approve this project. Thank you!

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenlandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 3:25:33 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Angela Marie Medina**
Zip: **10301-2624**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

Yes

Additional Comments:

As a Nurse Practitioner and former visiting nurse the area is already cluttered. Between the high schools, police precinct, courts and already established buildings it is very difficult to be able to not only drive in the area during the day but to park. I also live not far from the area and do not wish to clutter the area any more than it already is. It is a beautiful water front area and needs to be preserved to allow for tourists visits not housing.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 3:16:18 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Timothy Burke**
Zip: **11355**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **in favor**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

Yes

Additional Comments:

I support this project as we need the housing in transit accessible locations in NYC. We are in a housing crisis that is affecting way too many NYers. It is good for the economy and the city.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 12:47:22 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Jennifer Mallen**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent": **Private citizen, homeowner, tax payer**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

The introduction of R7 zoning -plus special considerations - for Staten Island is ridiculous. Our current infrastructure cant even handle our current population. Doing this jeopardizes the entire Island and all of our residents in terms of safety and quality of life. It must be rejected.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenlandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 11:46:12 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Dee Vandenburg**
Zip: **10312**

I represent:

- **A local community group or organization**

Details for "I Represent": **Staten Island Taxpayers' Association, Inc.**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

This dangerous precedent setting application needs to be rejected. This Island Wide Opposition is for good reason, it's called infrastructure...or in this case severe lack of. We have 2 sewer treatment plants for the entire Island. Both built for a life span of 35-45 years. We are well past that now. The Port Richmond STP that will serve this development additionally has combination overflow sent to it. National Grid has issues keeping up with there work, & Con Ed capacity is still trying to catch up with increases to their grids. These are only some of the issues that came to light after Superstorm Sandy. I could go on, but won't. We cannot afford to have this zone changed and add to the drain on our infrastructure. Common sense & looking at the bigger picture is why we are against this project.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 10:32:42 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Joanna Santarpia**
Zip: **10308**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

I beg you to stop projects like this one when so many of you don't know what life is like here. We don't need to bring about these high density changes to an island that is already overwhelmed and in an area already underserved.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 10:25:13 AM
Attachments: [R7 Zoning Change Application C210289ZMR.pdf](#)

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Patricia Rondinelli**
Zip: **10301**

I represent:
• **Myself**

Details for "I Represent": **City Council Candidate District 49**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

Please see the attached statement. This statement was also made on June 2, 2021 at the Community Board 1 meeting. Thank you.

Hi, I'm Pat Rondinelli, North Shore City Council Candidate District 49. I am testifying to strongly urge the City Planning Commission to deny Application C210289ZMR River North (Liberty Towers) and to deny a change in the Zoning laws to allow R-7 zoning on the North Shore of Staten Island and to please take into consideration the views of the North Shore residents living in the area who will be directly affected by this change. Allowing this type of building will only worsen conditions in an already over-burdened neighborhood already struggling to provide adequate services to those residents who call St. George their home. The required affordable housing units that the Manhattan developer promises comes at a great benefit to the developer, with generous property tax abatements that they receive by setting aside a percentage of affordable housing units and they stand to profit handsomely from it. While the developer is trying to use the required affordable housing units as a selling point to make this deal look attractive and get rezoning approval, those units are not guaranteed to North Shore residents. The developer will make their money, but the North Shore will be left with the problems that come with a 26-story building that houses an additional 750 units in an already overcrowded area that include infrastructure, school seats, parking, and transportation—issues that this community is already struggling with. Not only does the North Shore not have the infrastructure to accommodate these high-rise buildings, 26-story buildings do not fit into the character of the community. This zoning change, and subsequent development, will totally change the atmosphere of the neighborhood and open the door for further development of high-rise buildings on the North Shore in the future, affecting our quality of life, and not for the better. As many projects go unfinished in the St. George area, we must also take into consideration that the builder might not complete the project if funds run out. The North Shore already has unfinished projects that, due to bankruptcy, the builders weren't able to complete. We have Lighthouse Point, a 16-story structure along Bay Street that is unfinished, and we have a wheel that is unfinished. In addition, we have an outlet that is not fully rented, and we have a vacant stadium! Let's focus on the projects that are already started and need completion or improvement without taking

on a potential disaster. We do not need another promise from a builder of renaissance and economic development who has no real interest in the North Shore, or any of Staten Island for that matter. Too many outsiders are making decisions that the community does not agree with. This must stop and we must have more input from local residents as to what is beneficial to our North Shore communities. Again, I urge the City Planning Commission to deny this zoning change. Thank you.

Patricia T. Rondinelli

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Tuesday, July 13, 2021 10:10:54 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Doreen Bavaro**
Zip: **10306**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

I stand with my representative, and I am opposed to this project! Staten Island's infrastructure does NOT support this project!

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 5:47:16 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Michele Moore**
Zip: **10312**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

This project is not in line with the needs or desires of the neighborhood. This area has not seen enough the already existing infrastructure needs addressed and adding a building of this size and magnitude will only further the decline in quality of life in this area. Staten Island is not Manhattan or Brooklyn and the island already is overcrowded, burdened by traffic and does not have the appropriate services for more residents (schools, supermarket in this area, parking etc) build something smaller !

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 3:27:34 PM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Denise Pianoforte**
Zip: **10304**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

The construction of a 25 floor building in Staten Island will not only cause traffic problems that already is a major problem it will change life here & not for the better. People moved to the island for a better quality of life, let's keep it that way.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 11:41:12 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Kathleen Tramontana**
Zip: **10312**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

I do not think this project is for Staten Island

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 11:28:58 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Luisa Collins**
Zip: **10306**

I represent:

- **Myself**

Details for "I Represent": **Long time resident**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

We are presently in need of more roads, parking, amenities for people living here. Where are the schools, hospitals, doctors, social services, etc. to accommodate these new people are going to come? We do not have them for the people living here now. Flooding in places in which houses should have never been built. Traffic is so bad. Look at Hylan Blvd. Starting at 1:30 - 2 pm there bumper to bumper traffic until past 6:30PM. Are those people that will move to this location going stay there and do not get into other areas of the Island? The so called "Boulevard Shopping Center" on Hylan and Ebbits there is so much traffic now and not even 3/4 of the place is occupied. We need to address the present problems we NOW have instead of adding one more. Look at what the Salvo Brothers want to do with the lot in which Mount

Marisa was - 250 houses? The traffic it will cause, where is the water run-off of that location go when it rains? To the lower houses that had been there for years! Stop the greed of the developers NOW, please. We cannot afford such a building in Staten Island.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Wednesday, July 14, 2021 11:20:31 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Frances Edwards**
Zip: **10308**

I represent:

- **A local community group or organization**

Details for "I Represent": **The Giffords Civic Association**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

project is totally out of step with Staten Island. Higher density, more traffic and congestion on a small Island that is already overflowing with poor planning is no plan at all. It was the dump that effected the health of Staten Islanders now it's becoming the dumping ground for planners who see Staten Island as a cash cow.

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Joseph Helferty \(DCP\)](#); [Stephanie Shellooe \(DCP\)](#); statenilandcomments_dl@planning.nyc.gov
Subject: Comments re: C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)
Date: Thursday, July 15, 2021 9:42:16 AM

Re. Project: **C 210289 ZMR - RIVER NORTH (LIBERTY TOWERS)**

- Application Number: **C 210289 ZMR**
- Project: **RIVER NORTH (LIBERTY TOWERS)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Doreen Santiago**
Zip: **10306**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

Additional Comments:

I oppose the River North Project. A structure of this kind will change the landscape of Staten Island forever. Let's do something that would benefit the people who live here and love Staten Island, not something that will benefit someone's pocket.

Max Stember-Young

From: Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>
Sent: Monday, July 26, 2021 3:49 PM
To: Max Stember-Young; Rachel Belsky; Annie Boggs
Subject: [External] FW: Comments re: C 210289 ZMR - River North (Liberty Towers)

From: Public Hearing Comments (Do not reply) <PublicComments_DL@planning.nyc.gov>
Sent: Monday, July 26, 2021 11:46 AM
To: Joseph Helferty (DCP) <JHELFFERTY@planning.nyc.gov>; Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>; RichmondComments_DL <RichmondComments_DL@planning.nyc.gov>
Subject: Comments re: C 210289 ZMR - River North (Liberty Towers)

Re. Project: **C 210289 ZMR - River North (Liberty Towers)**

- Application Number: **C 210289 ZMR**
- Project: **River North (Liberty Towers)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **John Kilcullen**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent": **Local resident for over 25 years**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

Upon review of the preliminary plans for the proposed development at the above location with regards to a corresponding zone change (R7 from R6) needed for it to move forward , I oppose both the zoning change including the

removal of site from the Special Hillside district, which DCP is revising to make them more protective of the Island's Special neighborhood character. My objections are as follows: The proposed development is too large for this hillside site and would overpower the surrounding neighbors and streets including the uphill Castleton Park Towers. The current R6 density zoning (with the Special Hillside District overlay, of which the neighborhood applauded and values for its afforded development oversight and guidance) still allows for an appropriate redevelopment. I opposed spot rezoning (most recently opposing a height waiver for 93 Monroe Ave). The proposed R7 rezoning would permit taller out of character buildings with greater density. Spot rezoning and waivers are harmful for the greater neighborhood character. Additionally the proposed rezoning classification would make it denser than the adjacent Special St. George District (ie high rise district) and the newly approved Special Bay Street Corridor and Stapleton Waterfront District). To date, the St. George District has not been fully maximized or redeveloped as envisioned which reinforces the lack of need for the Liberty Tower project rezoning. Also, the neighborhood infrastructure: roadway and parking cannot handle additional traffic loads. And this development would further exacerbate the glaring lack of basic amenities, for new and existing residents.

Max Stember-Young

From: Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>
Sent: Monday, July 26, 2021 2:50 PM
To: Max Stember-Young; Rachel Belsky; Annie Boggs
Subject: [External] FW: Comments re: C 210289 ZMR - River North (Liberty Towers)
Attachments: River North testimony.docx

From: Public Hearing Comments (Do not reply) <PublicComments_DL@planning.nyc.gov>

Sent: Monday, July 26, 2021 12:19 PM

To: Joseph Helferty (DCP) <JHELFFERTY@planning.nyc.gov>; Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>; RichmondComments_DL <RichmondComments_DL@planning.nyc.gov>

Subject: Comments re: C 210289 ZMR - River North (Liberty Towers)

Re. Project: **C 210289 ZMR - River North (Liberty Towers)**

- Application Number: **C 210289 ZMR**
- Project: **River North (Liberty Towers)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Michael Harwood**

Zip: **10301**

I represent:

- **Myself**
- **A local business**

Details for "I Represent": **I am a resident of St. George and also own two rental buildings with a total of 12 apartment units.**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

Attached are updated comments I submitted to CB1 in opposition. I would also like to respond to some comments and questions raised at the public hearing. Several speakers mentioned a need for more density to support businesses and services in the area. This ignores the facts: St. George currently has 19,000 people per sq.mi., compared to 7200 for the rest of the Island. Adding more than 2000 people in 950 apartments on one site will triple the rest of the Island's density. We don't need this - current zoning will be in scale and the services should grow to meet this demand. The applicant said existing R6 zoning would not provide affordable housing - I believe this is not true because such a project would need hillside and other variances that would lead to affordability requirements. Also, the proposed rents in this project are barely below current market rents - apartments.com shows the average rent on Staten Island is \$1,850. This project has rents in that same range. My 12 1BR apartments rent for less than that. The "affordability" claim is a Trojan Horse to hide the damage that such a huge out-of-scale project will do to our community. Commissioner Cerullo asked why so big: because this R7+ will maximize profits but the developer is not adding anything to the neighborhood; only a 7000 sqft. plaza that is merely an entrance to their building. Why not add a public park across the street on the waterfront that is in disrepair? Because this is not about improving the neighborhood. This project must be rejected as wrong for this area.

The River North project and R7 zoning is wrong for St. George, wrong for the North Shore, and wrong for Staten Island. It is also wrong for the cause of affordable housing, which it purports to promote. The only people it is right for are the developers and real estate interests. And I say that as a homeowner as well as a landlord of 12 units in the neighborhood. Current R6 zoning on these properties would allow 176 apartment units, which is in keeping with past zoning changes that this community has been facing for more than 10 years. This project seeks to explode prior zoning to include 900 units, more than typical R7, allowing an increase of 725 units above R6. Let's assume an average per unit value of these apartments at the current community value between \$300,000 and \$350,000 per unit. That means this upzoning would increase this developer's property value by between 200 million and a quarter billion dollars! And what public amenity are they offering in return? A 7000 square foot public plaza that will serve as a main entrance for their tenants. Meanwhile, they are creating more than triple that amount of greenspace for their tenants that will be in a gated area inaccessible to the public.

A gift of over \$200 million in value will of course be an open invitation to other developers to come in and seek to build more R7 projects here and all over the Island, so watch out other Community Boards! And at the Land Use hearing, they said this will increase our property values. What does that mean exactly (even if it is true)? That means existing and future tenants seeking affordable rents will be priced out by increased values. And middle income families seeking to buy homes near mass transit, whether existing or new construction, will be priced out of the neighborhood, as so many already are. Nearly 700 new market rate units will not serve affordable housing but will cause displacement of existing borderline groups.

St. George already has a population density of approximately 19,000 people per square mile, compared to about 7200 for the Island as a whole. Adding another 2000 plus residents to this one corner will make us triple the density of the rest of the Island, even before other projects are allowed under R6 or greater, without the necessary infrastructure that will be needed. We don't need massive density increases - we need open space consistent with the existing hillside topography and public amenities that will encourage future residents and businesses to locate here because of the neighborhood character rather than a wall of high-rise apartment structures blocking the waterfront environment. What we need is responsible planning that integrates the entire community's needs. I urge the Community Board to oppose this zoning application in its entirety.

Max Stember-Young

From: Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>
Sent: Monday, July 26, 2021 5:31 PM
To: Max Stember-Young; Rachel Belsky; Annie Boggs
Subject: [External] Fwd: Comments re: C 210289 ZMR - River North (Liberty Towers)

From: "Public Hearing Comments (Do not reply)" <PublicComments_DL@planning.nyc.gov>
Date: July 26, 2021 at 4:41:03 PM EDT
To: "Joseph Helferty (DCP)" <JHELFFERTY@planning.nyc.gov>, "Annabelle Meunier (DCP)" <AMEUNIER@planning.nyc.gov>, RichmondComments_DL <RichmondComments_DL@planning.nyc.gov>
Subject: Comments re: C 210289 ZMR - River North (Liberty Towers)

Re. Project: **C 210289 ZMR - River North (Liberty Towers)**

- Application Number: **C 210289 ZMR**
- Project: **River North (Liberty Towers)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Nancy Bonior**
Zip: **10301**

I represent:

- **Other**

Details for "I Represent": **Myself and my husband Stephen Foust who resides at the same address**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

We are opposed to R7 because we do not want this historic lovely neighborhood to look like Harlem and Brooklyn developments. High rise-tall building on a small parcel of land on streets densely populated now. We do not need more people living in the small spaces on the north shore and taxing the resources that are already here: parking, police, fire, parks, schools etc... It will change the character and quality of life and character of the neighborhood that is very unique and an asset to the North Shore of Staten Island. aesthetically it does not fit with the character of the area and seems more like the recent developments in the area that have never been completed and our struggling if they were completed. It feels like a BIG mistake to change the zoning to R7 on these blocks and in this neighborhood. I agree housing is needed but there is a lot of land on Staten Island that could be developed to meet the housing need in a way that would not over densify one location. It does appear that the change in the zoning could bring financial profit to developers, builders and others promoting this project while ignoring the insight and effect on current residents in this dense area. It is out of scale and character for the proposed area.

Max Stember-Young

From: Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>
Sent: Monday, July 26, 2021 4:26 PM
To: Max Stember-Young; Annie Boggs; Rachel Belsky
Subject: [External] FW: Comments re: C 210289 ZMR - River North (Liberty Towers)

From: Public Hearing Comments (Do not reply) <PublicComments_DL@planning.nyc.gov>
Sent: Monday, July 26, 2021 4:18 PM
To: Joseph Helferty (DCP) <JHELFFERTY@planning.nyc.gov>; Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>; RichmondComments_DL <RichmondComments_DL@planning.nyc.gov>
Subject: Comments re: C 210289 ZMR - River North (Liberty Towers)

Re. Project: **C 210289 ZMR - River North (Liberty Towers)**

- Application Number: **C 210289 ZMR**
- Project: **River North (Liberty Towers)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Theodore Dorian**
Zip: **10301**

I represent:

- **A local community group or organization**

Details for "I Represent": **President of St. George Civic Association**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **Yes**
If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project: **Yes**

Additional Comments:

The developers proposing River North towers have spent a lot of time explaining our own neighborhood to us in terms that show little appreciation for the concern shown by civic groups such as ours, and by Borough President Oddo in his

urgent testimony before you. The developers ask for a “one time variance” on what they call a “pivotal site.” But a pivot to what future? This property falls within the recently declared special hillside district. Now before you is a proposal to take this recently designated land, which allows the highest, densest development currently allowed on Staten Island, and upzone it to allow even larger, denser construction. In the years since the special district designation, there has been no development in it. On the block above this lot, on St. Mark’s Place, sit the two tallest, most populous buildings in the borough. This zoning variance to redraw the boundaries of an existing, recently declared zone amounts to gerrymandering the site currently, and appropriately, established as R6. By increasing the population of the borough’s most densely populated block many times over, this rezoning would allow an untenable impact on the infrastructure of the neighborhood. This proposal buries the hillside and Staten Island’s signature ridgeline, and in doing so would defeat the very purpose of the hillside protections passed recently. The plan proposes to increase- by a factor of six!- the number of units currently permitted in an R6 zone, seeking to add 700 units to the currently permitted 170. The only apparent support for this project in the community seems to be from several local religious leaders who are saying that this development, and its set-aside for a small percentage of “affordable housing” justifies the resultant challenges. But consider them: Enormous traffic, parking, shopping, water pressure, and other infrastructure problems of buildings of such immensity and height at the bottom of a hillside whose crest already holds the tallest, densest buildings in the borough, dependent on narrow overburdened streets in a school area teeming with students. The proposed towers would be tall enough to obstruct the views of even those towers, as cited by Judy Montanez of the Castleton Park Tenants’ Association. And the rents for these “affordable” units are significantly higher than what is currently available in the area, which has some of the very lowest rents in the five boroughs. More affordable housing in this or any area would be desirable, but there are available packages of land on other blocks near public transportation that do not place such a burden on their areas, and would, in fact, be enhanced by it. To date, no down- or mid-hill construction east of Hamilton Avenue has been taller than the neighboring houses. The scale and civic style of architecture is way out of scale from the residential one and two-family houses that have been the only constructions on this hillside block in its history. This stunning breach of a recently established special district would reverberate negatively through a borough already beleaguered by poor planning and development. This unique stretch is the only remaining open vista corridor in the City. This terribly misguided plan would begin its devastation. Our association, which represents residents and businesses in the unique community of St. George, applauds Borough President James Oddo for his opposition to this plan, and for his firmly stated opposition to establishing a new tier of density in the borough’s zoning. We urge you to consider that his and Commissioner Cerullo’s concerns accurately reflect the views and frustrations of St. Georgians. The existing zoning (the maximum allowed in the borough) serves the area well, and there is absolutely no need to upzone this property. There are parts of our neighborhood that can effectively hold taller, denser construction without harm to existing infrastructure, traffic, and views. But this is a singularly poor property on which to rescind recently arrived-at protections, as shown by the nearly-unanimous vote of Community Board 1, and universal opposition across party lines. We urge you to vote against it and to encourage the property’s owners to devise plans that respect the current R6 and special hillside district zoning. This current zoning allows for ample population growth on the block downhill from our tallest, densest buildings.

Max Stember-Young

From: Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>
Sent: Tuesday, July 27, 2021 4:18 PM
To: Max Stember-Young; Annie Boggs; Rachel Belsky
Subject: [External] FW: Comments re: C 210289 ZMR - River North (Liberty Towers)

From: Public Hearing Comments (Do not reply) <PublicComments_DL@planning.nyc.gov>
Sent: Tuesday, July 27, 2021 1:05 PM
To: Joseph Helferty (DCP) <JHELFERTY@planning.nyc.gov>; Annabelle Meunier (DCP) <AMEUNIER@planning.nyc.gov>; RichmondComments_DL <RichmondComments_DL@planning.nyc.gov>
Subject: Comments re: C 210289 ZMR - River North (Liberty Towers)

Re. Project: **C 210289 ZMR - River North (Liberty Towers)**

- Application Number: **C 210289 ZMR**
- Project: **River North (Liberty Towers)**
- Public Hearing Date: **07/14/2021**
- Borough: **Staten Island**
- Community District: **1**

Comments on the Draft Environmental Impact Statement received by the 10th calendar day following the close of the public hearing will be considered by the lead agency.

Submitted by:

Name: **Linda Cohen**
Zip: **10301**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project?
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project: **No**

Additional Comments:

I hope that you accept these comments on the DEIS for River North. The deadlines written in the SILIVE legal notice and the online CPC site led to confusion. Can you please acknowledge receipt ? I am writing to oppose the River North

project. Our current Port Richmond Sewage Treatment Plant is old, and has inadequate capacity. It currently discharges millions of gallons of stormwater mixed with raw sewage into the Kill Van Kull during rainstorms. Unlike other boroughs and locations, there are no upgrades scheduled for this facility. The DEIS states that there will be no significant impacts to water quality for this huge project. How many millions more gallons of raw sewage must be discharged into the Kill Van Kull before you see significant adverse impacts. How long must people kayak, and fish in increasingly polluted waters ? Will our children's children's children ever have swimmable waters ? The parking is already horrendous in this area and the River North project does not provide adequate parking at all for it's residents. The problem will be exacerbated greatly by this project. This project is too big. The builders should build within current zoning laws. Please respect the vision and work that went into the previous ULURP processes which provided us with R6 zoning, and Special Hillside zoning etc. If this project is approved, it will prove that the ULURP process is worthless. Thank you, Linda Cohen