



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

February 17, 2026

Emily Spokowski
Mayor's Office of Environmental Coordination
Via Email: espokowski@moec.nyc.gov

Re: Draft Scope of Work for Brooklyn Maritime Terminal

Dear Ms. Spokowski,

This letter is in response to comments for the Draft Scope of Work (DSOW) proposed for the Brooklyn Maritime Terminal project (BMT) and specifically the historic resources section of the EIS.

The Historic Districts Council is the citywide advocate for New York's historic neighborhoods. For more than 50 years, HDC has supported local communities to help preserve the places that matter to them. In 2025, HDC selected Red Hook as a Six to Celebrate priority neighborhood, working with the local community on efforts to identify, recognize and preserve the important sites within this unique place in New York City.

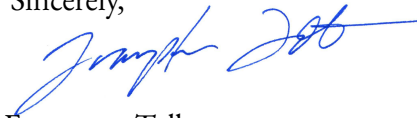
In regards to the DSOW feel that given the low rise mixed use character of Red Hook, historic resources outside the 400 foot rule as defined by SEQR will definitely be impacted by such a large scale project coming to the community and yet these resources will not be identified in the EIS under the current boundary.

Attached to this letter is a document of more than 70 possible historic resources (including one historic district) identified in numerous past surveys and documentation of the neighborhood. According to our analysis under the current SEQR guidelines fewer than 10% of these resources will fall within the 400 foot boundary, meaning they will be excluded from consideration for impacts from the BMT plan. Unlike undertakings in more dense areas such as the recent Midtown South Mixed Use Plan (in which HDC participated as a stakeholder), where the EIS identified close to 100 historic resources, here we do not believe the same boundary should apply given the lower density of the neighborhood and possibility for increased impacts over a larger area.

Further, acknowledging in the DSOW that the 400 foot boundary will be insufficient in relation to Governors Island, HDC believes that the same standard should apply to Red Hook. The scope and scale of the planned undertaking will be visible from far beyond the boundary within low scale Red Hook and so those sightlines should be considered and the boundary expanded. HDC would recommend at minimum that the historic resources boundary be expanded to $\frac{1}{4}$ of a mile, aligning it with the boundary for other SDSOW considerations and encompassing a much larger area of Red Hook.

Thank you for the opportunity to comment on the DSOW. I can be reached at framptont@hdc.org or 212-614-9107, x405 with any questions.

Sincerely,



Frampton Tolbert
Executive Director