



Mar. 15, 2026

Comments on Brooklyn Marine Terminal Draft Scope of Work for an Environmental Impact Statement (CEQR No. 25DME018K)

The proposed planning and evaluation of the BMT development DSOW regarding energy and climate change are thoroughly inadequate. The DSOW proposes mere compliance with state and city laws, and ‘discussion’ of clean energy and resilience options to deliver progress toward NYS and NYC climate and decarbonization goals (see notes.) This scope of this major project must include a plan for major advances toward securing a sustainable and resilient future for the project site and the surrounding community as specified in GOAL # 3. ‘Improve resiliency to prepare the Site and adjoining neighborhoods for sea-level rise and climate change’.

The Brooklyn Marine Terminal borders the vulnerable waterfront communities of Red Hook, Columbia St. Waterfront, Carroll Gardens and Cobble Hill. This area suffers from frequent flooding and storm sewer overflows as well as extreme vulnerability to coastal flooding. The proposed BMT development project will have a substantial negative impact on these neighborhoods with years of disruptive construction and traffic, and added burdens to local facilities and services. The BMT project can benefit from an integrated installation of renewable, resilient energy and connect to the adjacent neighborhoods to make a long-term investment in the area’s resilience, decarbonization and affordability. It can build upon the 2015-16 work to develop a Red Hook Community Microgrid (RH-CMG) which won a NY Prize Microgrid Stage 1 award and produced a Feasibility Study: <https://redhookcommunitymicrogrid.wordpress.com/>

The BMT project is a unique once-in-a-generation opportunity to develop a community scale network of renewable and resilient energy. The massive earthwork proposed to raise the port plateau and access roads, and to provide coastal flood protection can incorporate a low-cost path to build a thermal energy network (TEN,) the most energy efficient, affordable and resilient renewable energy infrastructure solution available.

A TEN installation can deliver long-term affordable heating, cooling and hot water to the BMT buildings and surrounding communities and is supportive of building electrification & decarbonization; community-scale clean and resilient energy; and is compatible with planned flood control, landfill, sewer improvements and green infrastructure. A fully developed RH-CMG project with community solar+battery storage can be integrated with the ‘all electric port’ as well as the proposed electric transportation network, to serve local emergency power and grid resilience functions. This critical public facility and mixed-use project can be a model of sustainability and resilience for NYC’s coastal neighborhoods.

The BMT DSOW must incorporate a plan to maximize the clean, resilient energy potential of the project. With proposed multiple buildings, 40+ acres of parking and open storage, and massive earthwork the BMT development presents a clear opportunity to construct an integrated renewable energy installation for the benefit of the planned facilities and the wider community. The NYCEDC plan identifies several of these opportunities. From the NYCEDC Brooklyn Marine Terminal Vision Plan 07-17-2025, 3.2., Resiliency and Climate Change:

"The port will be fully electric with expanded shore power and other electric equipment, which will reduce fossil fuel dependence. Other possible steps will include rooftop solar photovoltaics, microgrids to manage critical loads, and/or a thermal energy network."

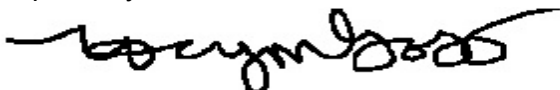
The BMT site's energy systems can interface with local community properties and systems for efficiency and resilience. Integration of solar photovoltaics on rooftops and parking/storage lots, ground-source thermal energy, batteries and thermal storage; EV charging stations and a proposed electric-powered local transportation network; smart grid and demand response programs; can provide clean energy and resilience to the site's facilities and the community.

The Build Public Renewables Act and NYPA set one clear path for this major project to build a 'clean electric port' and a vital community-scale clean energy network, https://nyassembly.gov/leg/default_fld=&leg_video=&bn=A01466&term=2021&Summary=Y&Text=Y This integration can provide energy efficiency, decarbonization and resilient emergency power to the wider vulnerable community. The BPRA directs NYPA to expand renewable energy to meet NY State's climate goals, serve disadvantaged communities' resilience and sustainability. Alternately, a community energy network can be developed and managed by a third party and/or a Public-Private Partnership.

The DSOW must investigate a comprehensive plan to:

1. Maximize the clean, resilient energy potential of the BMT.
2. Limit the proposed project's burden on the existing electric grid.
3. Utilize the BPRA and/or other available public and private resources to support development of a clean, resilient BMT which shares energy with its neighbors.
4. Study the community energy network opportunity and its integration with existing and proposed adjacent community energy networks such as the RH-CMG.
5. Underwrite the participation in the study of community representatives and experts dedicated to community-scale climate benefits.

Respectfully submitted,



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NOTES & LINKS:

Quotes from NYCEDC-BMT-Environmental-Review-DSOW:

“The Proposed Approvals would facilitate the implementation of resilient infrastructure and sustainable development practices...complementing other resilience measures underway in Red Hook.”

GOAL # 3. Improve resiliency to prepare the Site and adjoining neighborhoods for sea-level rise and climate change

TASK 13: ENERGY

“the Proposed Project does not require a detailed energy assessment” “The Proposed Project’s annual energy consumption will be compared to energy demand and generation capacity for New York City to discuss the potential effects of the Proposed Project on the available energy supply”

TASK 16: GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

“Relevant measures to reduce energy consumption and GHG emissions that could be incorporated into the Proposed Project will be discussed, and measures... to make it more resilient to the potential effects of climate change will be disclosed.”

RED HOOK COMMUNITY MICROGRID:

<https://redhookcommunitymicrogrid.wordpress.com/>

<https://www.microgridknowledge.com/editors-choice/article/11432935/ny-prize-stage-1-awards-who-why-and-what8217s-it-mean-for-community-microgrids>

NYSERDA TEN Program:

<https://www.nyserda.ny.gov/All-Programs/Large-Scale-Thermal/Large-Scale-Thermal-Program>

<https://www.nyserda.ny.gov/All-Programs/Large-Scale-Thermal/Winners>

TENS.NYC, a collaborative platform for the development of thermal energy networks:

<https://www.tens.nyc/whoweare>