

SUPREME COURT OF THE STATE OF NEW YORK  
NEW YORK COUNTY

----- X

In the Matter of NEIGHBORS UNITED BELOW CANAL,  
JAN LEE, DCTV, EDWARD J. CUCCIA, BETTY LEE,  
and AMERICAN INDIAN COMMUNITY HOUSE,

Petitioners,

For a Judgment Pursuant to Article 78 of the CPLR

*-against-*

**AFFIRMATION OF  
NATHAN TAYLOR IN  
SUPPORT OF THE  
VERIFIED ANSWER**

MAYOR BILL DEBLASIO, THE CITY OF NEW YORK,  
NEW YORK CITY PLANNING COMMISSION,  
MARISSA LAGO, NEW YORK CITY DEPARTMENT  
OF CITY PLANNING, NEW YORK CITY  
DEPARTMENT OF CORRECTION, CYNTHIA BRANN,  
NEW YORK CITY MAYOR’S OFFICE OF CRIMINAL  
JUSTICE, ELIZABETH GLAZER, NEW YORK CITY  
DEPARTMENT OF CITYWIDE ADMINISTRATIVE  
SERVICES, LISETTE CAMILO, and NEW YORK CITY  
COUNCIL,

Index No. 260402/2019

(Taylor, J.)

Respondents.

----- X

**NATHAN TAYLOR**, an attorney admitted to practice before the Courts of the  
State of New York, hereby affirms under penalty of perjury upon information and belief that the  
following is true and correct:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation  
Counsel of the City of New York, attorney for Respondents MAYOR BILL DEBLASIO  
("Mayor"), THE CITY OF NEW YORK, NEW YORK CITY PLANNING COMMISSION  
("CPC"), MARISSA LAGO ("Lago"), NEW YORK CITY DEPARTMENT OF CITY  
PLANNING ("DCP"), NEW YORK CITY DEPARTMENT OF CORRECTION ("DOC");  
CYNTHIA BRANN ("Brann"), NEW YORK CITY MAYOR’S OFFICE OF CRIMINAL  
JUSTICE NEW YORK ("MOCJ"), ELIZABETH GLAZER ("Glazer"), NEW YORK CITY

DEPARTMENT OF CITYWIDE ADMINISTRATIVE SERVICES (“DCAS”), LISETTE CAMILO (“Camilo”), and the NEW YORK CITY COUNSEL (collectively “Respondents” or “the City”), I submit this Affirmation in support of Respondents’ Verified Answer.

Respondents submit the following exhibits in support of their Verified Answer:

**A. Citywide Statement of Needs Documents**

1. Attached as Exhibit “1” is a true and correct copy of the Citywide Statement of Needs for City Facilities for FY 2020-2021, dated November 1, 2018.

2. Attached as Exhibit “2” is a true and correct copy of the Borough Presidents’ and Community Boards’ Responses to the FY 2020-2021 Citywide Statement of Needs, dated April 1, 2019.

**B. Uniform Land Use Review Procedure (“ULURP”) Applications**

3. Attached as Exhibit “3” is a true and correct copy of Land Use Review Application C 190116 MMK, concerning a Change in the City Map to demap a portion of State Street, dated March 21, 2019.

4. Attached as Exhibit “4” is a true and correct copy of Land Use Review Application C 190117 MMQ, concerning a Change in the City Map to demap a portion of 82nd Avenue, dated March 25, 2019.

5. Attached as Exhibit “5” is a true and correct copy of Land Use Review Application C 190252 MMM, concerning a Change in the City Map to demap a portion of White Street, dated January 29, 2019.

6. Attached as Exhibit “6” is a true and correct copy of Land Use Review Application C 190339 ZSK, concerning a Special Permit for the Brooklyn Borough-based Jail, dated March 14, 2019.

7. Attached as Exhibit “7” is a true and correct copy of ULURP application C 190342 ZSQ, concerning a Special Permit for the Queens Borough-based Jail, dated March 14, 2019.

8. Attached as Exhibit “8(A)” and “8(B)” is a true and correct copy of ULURP application C 190333 PSY, concerning Citywide Site Selection for the Borough-based Jail System, dated March 18, 2019, divided to meet NYSCEF size limits.

9. Attached as Exhibit “9” is a true and correct copy of Land Use Review Application C 190340 ZSM, concerning a Special Permit for the Manhattan Borough-based Jail, dated March 18, 2019.

10. Attached as Exhibit “10” is a true and correct copy of Land Use Review Application C 190335 ZSX, concerning a Special Permit for the Bronx Borough-based Jail, dated March 18, 2019.

### **C. ULURP Notices of Certification**

11. Attached as Exhibit “11” is a true and correct copy of a Notice of Certification of Land Use Application C 190341 PQM to Manhattan Community Board 1, dated March 25, 2019.

12. Attached as Exhibit “12” is a true and correct copy of a Notice of Certification of Land Use Application C 190333 PSY to Manhattan Community Board 1, dated March 25, 2019.

13. Attached as Exhibit “13” is a true and correct copy of a Notice of Certification of Land Use Application C 190333 PSY to Bronx Community District 1, dated March 25, 2019.

14. Attached as Exhibit “14” is a true and correct copy of a Notice of Certification of Land Use Application C 190341 PQM to Brooklyn Community Board 2, dated March 25, 2019.

15. Attached as Exhibit “15” is a true and correct copy of a Notice of Certification of Land Use Application C 190333 PSY to Queens Community Board 9, dated March 25, 2019.

**D. Documents Relating to Manhattan Community Board 1 and Community Board 3**

16. Attached as Exhibit “16” is a true and correct copy of the Minutes of a May 28, 2018 Meeting of Manhattan Community Board 1.

17. Attached as Exhibit “17” is a true and correct copy of an April 11, 2019 Presentation to the Manhattan Community Board 1 by the Mayor’s Office of Criminal Justice.

18. Attached as Exhibit “18” is a true and correct copy of the Minutes of an April 23, 2019 Meeting of Manhattan Community Board 3.

19. Attached as Exhibit “19” is a true and correct copy of the Minutes of a May 28, 2019 Meeting of Manhattan Community Board 1.

20. Attached as Exhibit “20” is a true and correct copy of the Recommendation of Manhattan Community Board 1 concerning multiple Land Use Applications, dated June 3, 2019

**E. Documents Relating to Consideration by the Manhattan Borough President**

21. Attached as Exhibit “21” is a true and correct copy of an E-mail from Manhattan Borough President Gale Brewer to Mayor de Blasio, dated August 27, 2018.

22. Attached as Exhibit “22” is a true and correct copy of a Letter from Manhattan Borough President Gale Brewer and Council Member Margaret Chin to Mayor Bill de Blasio, dated October 26, 2018.

23. Attached as Exhibit “23” is a true and correct copy of a Letter from Dana Kaplan to Manhattan Borough President Gale Brewer and Council Member Margaret Chin, dated November 30, 2018.

24. Attached as Exhibit “24” is a true and correct copy of a Letter from Manhattan Borough President Gale Brewer to Mayor Bill de Blasio, dated November 30, 2018.

25. Attached as Exhibit “25” is a true and correct copy of a Letter from Dana Kaplan to Manhattan Borough President Gale Brewer, dated January 7, 2019.

26. Attached as Exhibit “26” is a true and correct copy of the Recommendation of the Manhattan Borough President concerning Multiple Land Use Applications, dated July 5, 2019.

**F. Documents Relating to the Proceedings of the City Planning Commission (“CPC”)**

27. Attached as Exhibit “27” is a true and correct copy of Written Testimony Submitted to the City Planning Commission at the Public Hearing, dated July 10, 2019.

28. Attached as Exhibit “28” is a true and correct copy of a Transcript of the Public Hearing of the City Planning Commission, dated July 10, 2019.

29. Attached as Exhibit “29” is a true and correct copy of a July 29, 2019 Presentation to the City Planning Commission by the Department of City Planning.

30. Attached as Exhibit “30” is a true and correct copy of an August 12, 2019 Presentation to the City Planning Commission by the Department of City Planning.

31. Attached as Exhibit “31” is a true and correct copy of an August 26, 2019 Presentation to the City Planning Commission by the Department of City Planning.

**G. Correspondence between the City and the CPC**

32. Attached as Exhibit “32” is a true and correct copy of a Letter from Liz Glazer and Cynthia Braun to City Planning Commission Chair Marisa Lago concerning issues raised at the City Planning Commission Public Hearing, dated July 26, 2019.

33. Attached as Exhibit “33” is a true and correct copy of a Letter from Liz Glazer and Cynthia Braun to City Planning Commission Chair Marisa Lago concerning the siting of the Bronx Borough-based jail, dated August 9, 2019.

34. Attached as Exhibit “34” is a true and correct copy of a Letter from Liz Glazer and Cynthia Braun to City Planning Commission Chair Marisa Lago concerning community engagement and jail design, dated August 9, 2019.

35. Attached as Exhibit “35” is a true and correct copy of a Letter from Liz Glazer and Cynthia Braun to City Planning Commission Chair Marisa Lago concerning questions of the Commission, dated August 12, 2019.

36. Attached as Exhibit “36” is a true and correct copy of a Letter from Liz Glazer and Cynthia Braun to City Planning Commission Chair Marisa Lago concerning community engagement and jail design, dated August 23, 2019.

37. Attached as Exhibit “37” is a true and correct copy of a Letter from Liz Glazer and Cynthia Braun to City Planning Commission Chair Marisa Lago concerning women in detention, dated August 23, 2019.

38. Attached as Exhibit “38” is a true and correct copy of a Letter from Liz Glazer and Cynthia Braun to City Planning Commission Chair Marisa Lago concerning questions of the Commission, dated August 26, 2019.

39. Attached as Exhibit “39” is a true and correct copy of a Letter from Liz Glazer, Cynthia Braun, and Lorraine Grillo to City Planning Commission Chair Marisa Lago concerning post-ULURP design engagement, dated August 26, 2019.

#### **H. The Reports of the CPC**

40. Attached as Exhibit “40” is a true and correct copy of the CPC Calendar and Disposition Sheet, dated August 8, 2019.

41. Attached as Exhibit “41” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190333 PSY (“Lead CPC Report”), dated September 3, 2019.

42. Attached as Exhibit “42” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190342 ZSQ, dated September 3, 2019.

43. Attached as Exhibit “43” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190340 ZSM, dated September 3, 2019.

44. Attached as Exhibit “44” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190117 MMQ, dated September 3, 2019.

45. Attached as Exhibit “45” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190335 ZSX, dated September 3, 2019.

46. Attached as Exhibit “46” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190336 ZMX, dated September 3, 2019.

47. Attached as Exhibit “47” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190337 ZRX, dated September 3, 2019.

48. Attached as Exhibit “48” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190252 MMM, dated September 3, 2019.

49. Attached as Exhibit “49” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190334 ZRY, dated September 3, 2019.

50. Attached as Exhibit “50” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190338 HAX, dated September 3, 2019.

51. Attached as Exhibit “51” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190341 PQM, dated September 3, 2019.

52. Attached as Exhibit “52” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190339 ZSK, dated September 3, 2019.

53. Attached as Exhibit “53” is a true and correct copy of the Report of the City Planning Commission concerning Land Use Application C 190116 MMK, dated September 3, 2019.

#### **I. Documents Relating to Consideration by the City Council**

54. Attached as Exhibit “54” is a true and correct copy of the City Council Land Use Committee Calendar, dated September 2, 2019.

55. Attached as Exhibit “55” is a true and correct copy of a Transcript of the Hearing of the City Council Subcommittee on Landmarks, Public Siting and Maritime Uses, dated September 5, 2019.

56. Attached as Exhibit “56” is a true and correct copy of the City Council Stated Meeting Agenda with Hyperlinks, dated September 12, 2019.

57. Attached as Exhibit “57” is a true and correct copy of a Transcript of the Proceedings of the City Council for the Stated Meeting, dated September 12, 2019.

58. Attached as Exhibit “58” is a true and correct copy of the Land Use Calendar - Week of September 16, 2019 - September 20, 2019, dated September 16, 2019.



59. Attached as Exhibit “59” is a true and correct copy of a Transcript of the Proceedings of the City Council Subcommittee on Landmarks, Public Siting and Maritime Uses, dated September 18, 2019.

60. Attached as Exhibit “60” is a true and correct copy of the City Council Committee on Land Use Calendar, dated October 14, 2019.

61. Attached as Exhibit “61” is a true and correct copy of the City Council Committee on Land Use Agenda, dated October 16, 2019.

62. Attached as Exhibit “62” is a true and correct copy of a Transcript of the Proceedings of the City Council Committee on Land Use, dated October 16, 2019.

63. Attached as Exhibit “63” is a true and correct copy of a Transcript of the Proceedings of the City Council Subcommittee on Landmarks, Public Siting and Dispositions, dated October 16, 2019.

64. Attached as Exhibit “64” is a true and correct copy of the City Council Stated Meeting Agenda with Hyperlinks, dated October 17, 2019.

65. Attached as Exhibit “65” is a true and correct copy of the Joint Report of the Land Use Committee and The Subcommittee on Landmarks, Public Siting and Maritime Uses, dated October 17, 2019.

66. Attached as Exhibit “66” is a true and correct copy of a Letter from City Planning Commission Chair Marisa Lago to the City Council concerning the Council’s modifications, dated October 17, 2019.

67. Attached as Exhibit “67” is a true and correct copy of a Transcript of the Proceedings of the City Council for the Stated Meeting, dated October 17, 2019.

68. Attached as Exhibit “68” is a true and correct copy of the Minutes of an October 17, 2019 Proceedings of the City Council for the Stated Meeting.

69. Attached as Exhibit “69” is a true and correct copy of the Points of Agreement between the Mayor and Members of the City Council, dated October 18, 2019.

#### **J. The Resolutions of the City Council**

70. Attached as Exhibit “70” is a true and correct copy of NYC Council Resolution No 1118, dated October 17, 2019.

71. Attached as Exhibit “71” is a true and correct copy of NYC Council Resolution No 1119, dated October 17, 2019.

72. Attached as Exhibit “72” is a true and correct copy of NYC Council Resolution No 1120, dated October 17, 2019.

73. Attached as Exhibit “73” is a true and correct copy of NYC Council Resolution No 1121, dated October 17, 2019.

74. Attached as Exhibit “74” is a true and correct copy of NYC Council Resolution No 1122, dated October 17, 2019.

75. Attached as Exhibit “75” is a true and correct copy of NYC Council Resolution No 1123, dated October 17, 2019.

76. Attached as Exhibit “76” is a true and correct copy of NYC Council Resolution No 1124, dated October 17, 2019.

77. Attached as Exhibit “77” is a true and correct copy of NYC Council Resolution No 1125, dated October 17, 2019.

78. Attached as Exhibit “78” is a true and correct copy of NYC Council Resolution No 1126, dated October 17, 2019.

79. Attached as Exhibit “79” is a true and correct copy of NYC Council Resolution No 1127, dated October 17, 2019.

80. Attached as Exhibit “80” is a true and correct copy of NYC Council Resolution No 1128, dated October 17, 2019.

81. Attached as Exhibit “81” is a true and correct copy of NYC Council Resolution No 1129, dated October 17, 2019.

82. Attached as Exhibit “82” is a true and correct copy of NYC Council Resolution No 1130, dated October 17, 2019.

#### **K. Environmental Review Documents**

83. Attached as Exhibit “83” is a true and correct copy of a Letter designating the Department of Correction as Lead Agency for environmental review, dated August 14, 2018.

84. Attached as Exhibit “84” is a true and correct copy of a Positive Declaration, dated August 14, 2018.

85. Attached as Exhibit “85” is a true and correct copy of a Draft Scope of Work for preparation of a Draft Environmental Impact Statement (“EIS”), dated August 14, 2018.

86. Attached as Exhibit “86” is a true and correct copy of an Environmental Assessment Statement, dated August 15, 2018.

87. Attached as Exhibit “87(A)” through “87(C)” is a true and correct copy of a Final Scope of Work for preparation of a Draft EIS, dated March 22, 2019, divided to meet NYSCEF size limits.

88. Attached as Exhibit “88” is a true and correct copy of a Notice of Completion of a Draft EIS, dated March 22, 2019.

89. Attached as Exhibit “89(A)” through “89(F)” is a true and correct copy of a Draft EIS (Appendix E omitted for volume, but available from <https://a002->

ceqraccess.nyc.gov/ceqr/ProjectInformation/ProjectDetail/13546-18DOC001Y by selecting file “18DOC001Y\_DEIS\_03222019\_Part\_13”), dated March 27, 2019, divided to meet the NYSCEF file size limits.

90. Attached as Exhibit “90” is a true and correct copy of a PublicHearing Notice in The City Record, dated June 19, 2019.

91. Attached as Exhibit “91” is a true and correct copy of a Notice of Public Hearing, dated June 19, 2019.

92. Attached as Exhibit “92(A)” through “92(J)” is a true and correct copy of a Final EIS (Appendix E omitted for volume, but available from <https://a002-ceqraccess.nyc.gov/ceqr/ProjectInformation/ProjectDetail/13546-18DOC001Y> by selecting file “18DOC001Y\_FEIS\_08232019\_Part\_14”), dated August 23, 2019, divided to meet NYSCEF size limits.

93. Attached as Exhibit “93” is a true and correct copy of a Notice of Completion of a Final EIS, dated August 23, 2019.

94. Attached as Exhibit “94” is a true and correct copy of a Technical Memorandum considering modifications by the City Council, dated October 11, 2019.

95. Attached as Exhibit “95” is a true and correct copy of the Lead Agency Statement of Findings, dated March 11, 2020.

**L. Documents relating to the *Smaller, Safer, Fairer* Criminal Justice Reform Plan**

96. Attached as Exhibit “96” is a true and correct copy of “Smaller Safer Fairer,” a Report of the Mayor’s Office of Criminal Justice, dated June 22, 2017.

97. Attached as Exhibit “97” is a true and correct copy of the November, 2017 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

98. Attached as Exhibit “98” is a true and correct copy of the December, 2017 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

99. Attached as Exhibit “99” is a true and correct copy of the January, 2018 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

100. Attached as Exhibit “100” is a true and correct copy of the February, 2018 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

101. Attached as Exhibit “101” is a true and correct copy of the March, 2018 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

102. Attached as Exhibit “102” is a true and correct copy of the April, 2018 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

103. Attached as Exhibit “103” is a true and correct copy of the May, 2018 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

104. Attached as Exhibit “104” is a true and correct copy of the June to July, 2018 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

105. Attached as Exhibit “105” is a true and correct copy of the August, 2018 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

106. Attached as Exhibit “106” is a true and correct copy of the September to October, 2018 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

107. Attached as Exhibit “107” is a true and correct copy of “Smaller Safer Fairer Rikers Island Progress Report,” a Report of the Mayor’s Office of Criminal Justice, dated December, 2018.

108. Attached as Exhibit “108” is a true and correct copy of the May to June, 2019 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

109. Attached as Exhibit “109” is a true and correct copy of the July to August, 2019 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

110. Attached as Exhibit “110” is a true and correct copy of the September to October, 2019 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

111. Attached as Exhibit “111” is a true and correct copy of the November to December, 2019 Rikers Island Closure Progress Scorecard of the Mayor’s Office of Criminal Justice.

**M. Documents relating to the Justice Implementation Task Force (“JITF”)**

*a. Steering Committee*

112. Attached as Exhibit “112” is a true and correct copy of a September 13, 2017 Presentation to the the Justice Implementation Task Force Steering Committee.

113. Attached as Exhibit “113” is a true and correct copy of a January 11, 2018 Presentation to the the Justice Implementation Task Force Steering Committee.

114. Attached as Exhibit “114” is a true and correct copy of a January 31, 2018 Presentation to the the Justice Implementation Task Force Steering Committee.

115. Attached as Exhibit “115” is a true and correct copy of a May 22, 2018 Presentation to the the Justice Implementation Task Force Steering Committee.

*b. Population Reduction Working Group*

116. Attached as Exhibit “116” is a true and correct copy of a November 6, 2017 Presentation to the the Justice Implementation Task Force Jail Population Reduction Working Group.

117. Attached as Exhibit “117” is a true and correct copy of a November 29, 2017 Presentation to the the Justice Implementation Task Force Jail Population Reduction Working Group.

118. Attached as Exhibit “118” is a true and correct copy of a January 12, 2018 Presentation to the the Justice Implementation Task Force Jail Population Reduction Working Group.

119. Attached as Exhibit “119” is a true and correct copy of a February 9, 2018 Presentation to the the Justice Implementation Task Force Jail Population Reduction Working Group.

120. Attached as Exhibit “120” is a true and correct copy of a March 9, 2018 Presentation to the the Justice Implementation Task Force Jail Population Reduction Working Group.

121. Attached as Exhibit “121” is a true and correct copy of an April 6, 2018 Presentation to the the Justice Implementation Task Force Jail Population Reduction Working Group.

122. Attached as Exhibit “122” is a true and correct copy of a May 15, 2018 Presentation to the the Justice Implementation Task Force Jail Population Reduction Working Group.

123. Attached as Exhibit “123” is a true and correct copy of a July 17, 2018 Presentation to the the Justice Implementation Task Force Jail Population Reduction Working Group.

*c. Design and Culture Change Working Groups*

124. Attached as Exhibit “124” is a true and correct copy of a November 6, 2017 Presentation to the the Justice Implementation Task Force Design Working Group.

125. Attached as Exhibit “125” is a true and correct copy of a November 8, 2017 Presentation to the the Justice Implementation Task Force Culture Change Working Group.

126. Attached as Exhibit “126” is a true and correct copy of a November 30, 2017 Presentation to the the Justice Implementation Task Force Design Working Group.

127. Attached as Exhibit “127” is a true and correct copy of a December 14, 2017 Presentation to the the Justice Implementation Task Force Culture Change Working Group.

128. Attached as Exhibit “128” is a true and correct copy of a January 10, 2018 Presentation to the the Justice Implementation Task Force Design Working Group.

129. Attached as Exhibit “129” is a true and correct copy of a January 17, 2018 Presentation to the the Justice Implementation Task Force Culture Change Working Group.

130. Attached as Exhibit “130” is a true and correct copy of a February 21, 2018 Presentation to the the Justice Implementation Task Force Design Working Group.

131. Attached as Exhibit “131” is a true and correct copy of a March 15, 2018 Presentation to the the Justice Implementation Task Force Culture Change Working Group.

132. Attached as Exhibit “132” is a true and correct copy of a March 21, 2018 Presentation to the the Justice Implementation Task Force Design Working Group.

133. Attached as Exhibit “133” is a true and correct copy of an April 19, 2018 Presentation to the the Justice Implementation Task Force Design and Culture Change Working Group.

134. Attached as Exhibit “134” is a true and correct copy of a May 15, 2018 Presentation to the the Justice Implementation Task Force Design and Culture Change Working Group.

135. Attached as Exhibit “135” is a true and correct copy of a June 28, 2018 Presentation to the the Justice Implementation Task Force Design and Culture Change Working Group.



#### **N. General Correspondence of MOCJ**

136. Attached as Exhibit “136” is a true and correct copy of a letter from Amy Frietag, Kaplan Fund to Dana Kaplan, dated October 22, 2018.

137. Attached as Exhibit “137” is a true and correct copy of a letter from Council Member Margaret Chin to Mayor Bill de Blasio re: 80 Centre Street, dated September 24, 2018.

138. Attached as Exhibit “138” is a true and correct copy of a letter from elected representatives of lower Manhattan to Mayor Bill de Blasio, dated September 27, 2018.

139. Attached as Exhibit “139” is a true and correct copy of a letter from Dana Kaplan to Council Member Margaret Chin, dated September 27, 2018.

140. Attached as Exhibit “140” is a true and correct copy of a letter from Vaylateena Jones, Lower East Side Power Partnership, to Dana Kaplan, dated December 21, 2018.

141. Attached as Exhibit “141” is a true and correct copy of a letter from Dana Kaplan to elected representatives of lower Manhattan, dated January 7, 2019.

142. Attached as Exhibit “142” is a true and correct copy of a letter from Dana Kaplan to Vaylateena Jones, Lower East Side Power Partnership, dated February 8, 2019.

143. Attached as Exhibit “143” is a true and correct copy of a letter from Dana Kaplan to Amy Frietag, Kaplan Fund, dated March 19, 2019.

144. Attached as Exhibit “144” is a true and correct copy of a letter from Women’s Community Justice Association to Mayor Bill de Blasio, dated March 26, 2019.

145. Attached as Exhibit “145” is a true and correct copy of a letter from Vaylateena Jones, Lower East Side Power Partnership, to Community Boards Bronx 1, Brooklyn 2, Manhattan 1, and Queens 9, dated April 2, 2019.

146. Attached as Exhibit “146” is a true and correct copy of a letter from Dana Kaplan to Vaylateena Jones, Lower East Side Power Partnership, dated May 16, 2019.

147. Attached as Exhibit “147” is a true and correct copy of a letter from Dana Kaplan to Women’s Community Justice Association, dated May 16, 2019.

**O. Reports of the Neighborhood Advisory Councils**

148. Attached as Exhibit “148” is a true and correct copy of the Minutes of a January 16, 2019 Meeting of the Manhattan Neighborhood Advisory Committee.

149. Attached as Exhibit “149” is a true and correct copy of a January 16, 2019 Presentation to the Manhattan Neighborhood Advisory Committee.

150. Attached as Exhibit “150” is a true and correct copy of the Minutes of a January 30, 2019 Meeting of the Manhattan Neighborhood Advisory Committee.

151. Attached as Exhibit “151” is a true and correct copy of a January 30, 2019 Presentation to the Manhattan Neighborhood Advisory Committee.

152. Attached as Exhibit “152” is a true and correct copy of the Minutes of a February 27, 2019 Meeting of the Manhattan Neighborhood Advisory Committee.

153. Attached as Exhibit “153” is a true and correct copy of a February 27, 2019 Presentation to the Manhattan Neighborhood Advisory Committee.

154. Attached as Exhibit “154” is a true and correct copy of the Minutes of a March 6, 2019 Meeting of the Manhattan Neighborhood Advisory Committee.

155. Attached as Exhibit “155” is a true and correct copy of the Minutes of a March 18, 2019 Meeting of the Manhattan Neighborhood Advisory Committee.

156. Attached as Exhibit “156” is a true and correct copy of a March 18, 2019 Presentation to the Manhattan Neighborhood Advisory Committee.

157. Attached as Exhibit “157” is a true and correct copy of the Minutes of an April 2, 2019 Meeting of the Manhattan Neighborhood Advisory Committee.

158. Attached as Exhibit “158” is a true and correct copy of “Manhattan Neighborhood Advisory Committee Guidelines and Principles,” a Report of the Manhattan Neighborhood Advisory Committee.

159. Attached as Exhibit “159” is a true and correct copy of “Addendum Manhattan Neighborhood Advisory Committee Guidelines and Principles,” a Report of the Manhattan Neighborhood Advisory Committee.

**P. Miscellaneous Documents**

160. Attached as Exhibit “160” is a true and correct copy of Testimony of Matthew Driscoll, Comm’r NYS Dept. of Transportation to the New York Legislature Joint Legislative Fiscal Committees, dated February 15, 2017.

161. Attached as Exhibit “1” is a true and correct copy of a map of the properties acquired in Land Use action C 830988 PSR, the Staten Island open space acquisition, dated February 13, 2020.

162. Attached as Exhibit “162” is a true and correct copy of the National Register of Historic Places Nomination Form – Engine Company 31, dated January 18, 1966.

163. Attached as Exhibit “17” is a true and correct copy of a May 2019 Presentation to Bronx Community Board 1 by the Mayor’s Office of Criminal Justice.

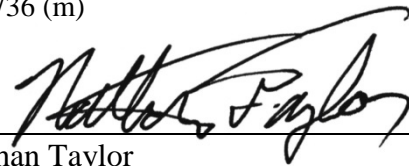
**CONCLUSION**

164. For the reasons explained in the accompanying papers submitted by Respondents, the Petition should be denied in its entirety.

Dated: New York, New York  
June 1, 2020

JAMES E. JOHNSON  
Corporation Counsel of the  
City of New York  
*Attorney for Respondents Mayor Bill DeBlasio; the City of New York; New York City Department of City Planning; Marissa Lago; New York City Planning Commission; New York City Department of Correction; Cynthia Brann; New York City Mayor's Office of Criminal Justice; Elizabeth Glazer; New York City Department of Citywide Administrative Services; Lisette Camilo; and New York City Council*  
100 Church Street, Room 6-144  
New York, New York 10007  
(646) 940-0736 (m)

By: \_\_\_\_\_



Nathan Taylor  
Assistant Corporation Counsel  
Environmental Law Division