

# **Draft Final Scope of Work to Prepare a Draft Environmental Impact Statement for the Gowanus Canal Combined Sewer Overflow (CSO) Facilities Project**

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## **A. INTRODUCTION**

This ~~Draft Final~~ Scope of Work (~~Draft Final~~ Scope) is for the purpose of providing the methodology and framework for analysis of a draft EIS. The New York City (City) Department of Environmental Protection (DEP) is producing the design and construction of two additional combined sewer overflow (CSO)<sup>1</sup> facilities to further reduce the volume of combined sewer overflows entering the Gowanus Canal (the Canal). This Project is mandated by the USEPA to satisfy remediation objectives under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund). The siting of two CSO storage tank facilities will be reviewed for their potential impacts on the surrounding environment, in accordance with the New York State Environmental Quality Review Act (SEQRA), City Environmental Quality Review (CEQR), and the Uniform Land Use Review Procedure (ULURP). Following the designation of the Canal as a Superfund site by the United States Environmental Protection Agency (USEPA) in 2010, USEPA issued a Record of Decision (USEPA ROD) in September 2013 that described the USEPA-selected remedy to meet preliminary remediation goals (PRGs) for the Canal.

The Canal is an approximately 1.8-mile-long, manmade waterway located in Brooklyn, Kings County, New York (see **Figure 1**). The first of the two CSO facilities, “the “Head End Facility,” would include an 8-million-gallon (MG) tank that would intercept overflow of CSO solids from the “head end,” or northernmost portion of the Canal. The second facility, or “the “Owls Head Facility,” would include a 4-MG tank that would intercept overflow of CSO solids from the middle of the Canal near the northern terminus of 2nd Avenue ~~and near~~ the 4th Street turning basin.<sup>2</sup> Construction of the Head End Facility would require the lease or acquisition of three privately owned parcels adjacent to the Canal.<sup>3</sup> Construction of the Owls Head Facility would require the use of one City-owned parcel and the lease or

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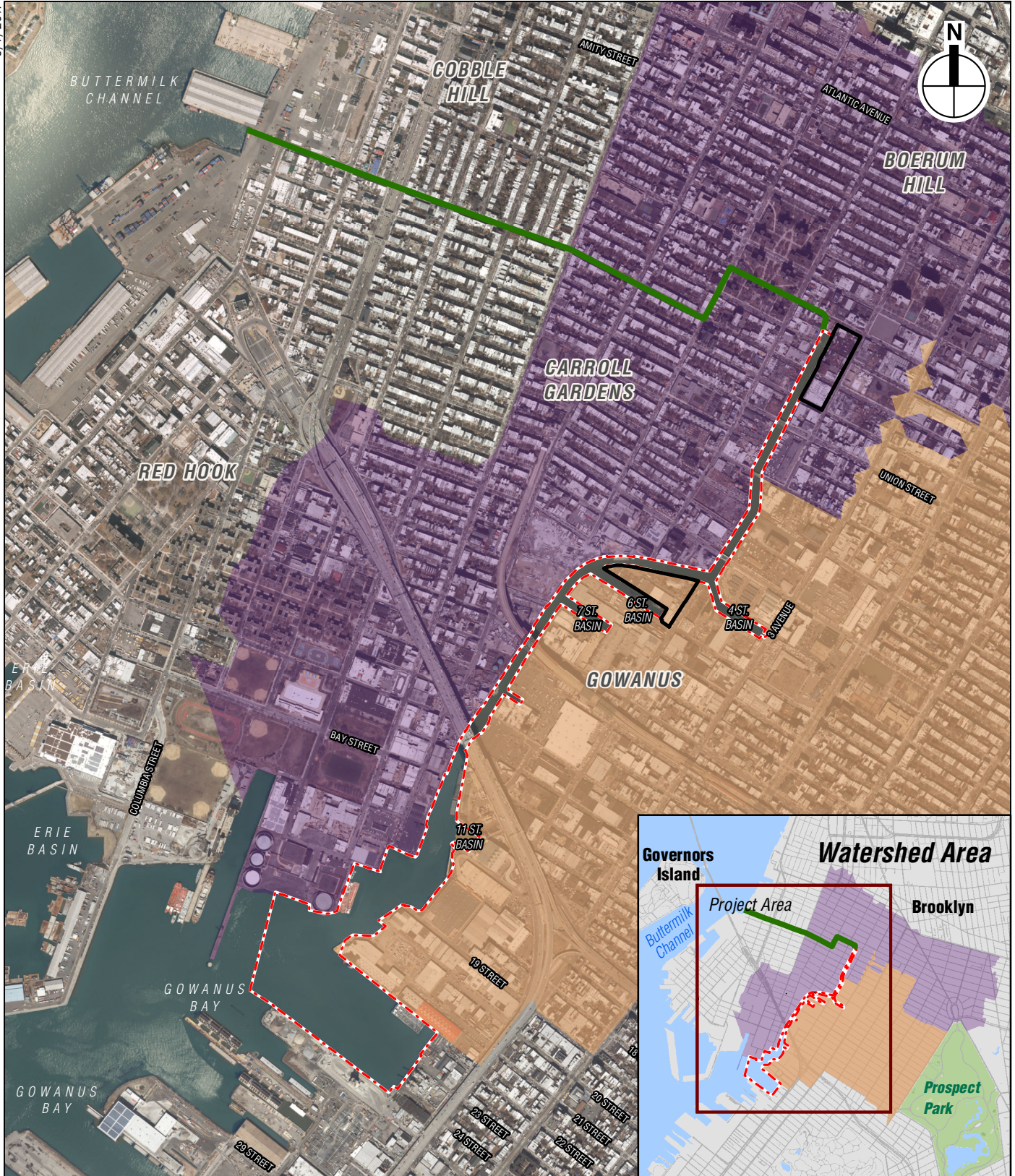
<sup>1</sup> CSO is the result of rainfall runoff entering the combined sewer system during wet weather when precipitation is intense enough to trigger overflows. In order to protect drainage areas and private property, and prevent street flooding, excess flow depending on rainfall intensity is directed to outfalls through regulators that act as relief valves.

<sup>2</sup> The Canal has four short turning basins that branch to the east of the main channel at 4th Street, 6th Street, 7th Street, and 11th Street; a fifth turning basin located at 1st Street, has been filled in and would be restored independent of this Project as part of the mandated Superfund remediation of the Canal. Turning basins allow vessels in the Canal to turn and/or reverse direction.

<sup>3</sup> ~~DEP is will~~ also ~~be considering pursuing~~ the demapping of the mapped portion of Douglass Street to correct the title and record for this portion of the Head End Facility—this portion of Douglass Street is mapped but unbuilt on portions of Block 418, Lot 1 and Block 411, Lot 24, located in the area to be developed with the Head End Facility. The demapping action is not necessary for the construction of the Head End Facility and will follow on a different schedule from the site selection and acquisition ULURP.



8/9/2017



- Project Sites
- Gowanus Canal
- Gowanus Canal Flushing Tunnel
- Red Hook Sewershed\*
- Owls Head Sewershed\*

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\* Sewershed areas indicate the portions of the Gowanus Canal Watershed served by each WWTP

**Gowanus Canal CSO Facilities**

Project Area  
 Gowanus Canal  
 Figure 1



acquisition of up to four privately owned parcels adjacent to the Canal.<sup>4</sup> Collectively, the Project includes the lease or acquisition of up to seven properties to support the facilities and construction staging areas.

The Head End Facility is proposed to be located at 242 Nevins Street (Block 418, Lot 1) and 234 Butler Street (Block 411, Lot 24), with an area for construction staging located at 270 Nevins Street (Block 425, Lot 1) and would intercept CSO solids primarily from CSO outfall RH-034. The Owls Head Facility would be located at the five parcels consisting of 2 2nd Avenue (Block 977, Lot 3), 110 5th Street (Block 990, Lot 21), 122 5th Street (Block 990, Lot 16), 22 2nd Avenue (Block 990, Lot 1), and 5th Street (Block 977, Lot 1), with portions of this area used for construction staging. The Owls Head Facility would intercept CSO solids primarily from CSO outfall OH-007 (see **Figure 2**).

As lead agency for the Project, DEP is preparing a Draft Environmental Impact Statement (DEIS) for the construction of both the Head End Facility and the Owls Head Facility (the Gowanus Canal CSO Facilities) and has determined that the Project may result in one or more significant adverse environmental impacts. Accordingly, DEP will prepare the DEIS for public review and comment, and for consideration by other involved and interested agencies.

In accordance with CEQR, the Draft Scope of Work was distributed for public review. A public meeting is scheduled to receive public comments on this the Draft Scope of Work was held on May 4<sup>th</sup>, 2017 at 7 PM and will be held at P.S. 32, 317 Hoyt Street in Brooklyn, NY. Written comments on the Draft Scope of Work will also be were accepted until May 14<sup>th</sup> June 16th, 2017 (in response to public request, the comment period was extended beyond the initial end date of May 14, 2017). This Final Scope of Work was then prepared, incorporating all relevant comments made on the scope and revising the extent or methodologies of the studies, as appropriate, in response to comments made during the public comment period. The DEIS was prepared in accordance with the Final Scope of Work.

## **B. BACKGROUND INFORMATION**

### **HISTORY OF THE GOWANUS CANAL**

In the early 19th century, the site where the Canal is now located was occupied by Gowanus Creek, local tributaries, and lowland marshes. In 1848, the State of New York authorized construction of the Canal in order to open the area to barge traffic, increase circulation and flushing, receive stormwater, and fill the adjacent lowlands for development. Construction of the Canal began in the 1860s by bulkheading and dredging the creek.

Following its construction, the Canal quickly became one of the nation's busiest industrial waterways, serving heavy industries in the area that included coal yards, cement manufacturing, tanneries, paint and ink factories, machine shops, chemical plants, oil refineries, and three manufactured gas plants (MGPs).


In 1911, the City began operating the Gowanus Canal Flushing Tunnel—a pumping system and mile-long tunnel—with the goal of improving the Canal's overall water quality. The Flushing Tunnel improved circulation and flushed stagnant water from the Canal by pumping from the head of Gowanus Canal to

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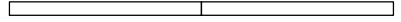
<sup>4</sup> Construction of the Owls Head Facility ~~may would~~ also require Site Selection pursuant to the City of New York Charter and demapping approvals. The site selection and acquisition actions and the demapping action will undergo separate review under ULURP. As described in more detail below, the demapping action is not necessary to facilitate the construction of the Owls Head Facility.

8/25/2017



-  Project Sites
-  Gowanus Canal
-  Construction Staging Areas
-  New Force Main
-  In-street Sewer Line Improvements
-  Outfall Locations

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**Gowanus Canal CSO Facilities**

Project Location  
**Figure 2**



Buttermilk Channel, a small tidal strait that separates Governors Island from Brooklyn. The Flushing Tunnel operated until the mid-1960s; ~~it~~ and was rehabilitated and reactivated in 1999. At ~~this~~ that time, the direction of flow was reversed to bring more highly oxygenated water from Buttermilk Channel to the head of the Canal.

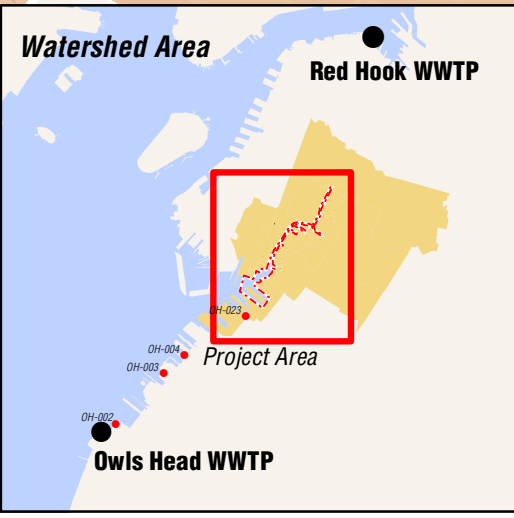
Currently, the Canal is surrounded by a mix of residential, commercial, and industrial uses. The residential areas include the neighborhoods of Gowanus, Park Slope, Cobble Hill, Carroll Gardens, and Red Hook, with an increasing residential presence currently near and along the waterway. Properties along the waterfront have historically been primarily commercial and industrial in nature; in recent years, new high-density residential developments have been constructed.

In October of 2016, the Department of City Planning along with other Ceity agencies launched the Gowanus PLACES Neighborhood Planning Study, which seeks to foster and create a thriving, working, and stronger-more resilient neighborhood by reinforcing and encouraging ~~the a strong~~ local economy anchored by a mix of uses and businesses, while creating opportunities for new housing with affordable housing in appropriate locations. In early 2017, as part of undertaking the Study, DCP began a community outreach process to gather feedback on a variety of topics before developing a planning and land use framework for the area. Following completion of the planning study and framework, which will include further community feedback and input, implementation could include portions of the study areas being rezoned to allow for residential use, among other uses and goals of the study, which is not presently permitted by the existing zoning in the area. However, the planning study is current in its preliminary stages and its outcome and where new residential uses could be permitted is not known at this time. Therefore, for the purposes of the EIS and relevant analysis chapters, the existing zoning regulations and associated current patterns and trends applicable to the Head End Site, the Owls Head Site, and the study areas are assumed to remain in place in the 2028 analysis year.

## COMBINED SEWER SYSTEM

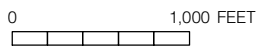
DEP operates 14 wastewater treatment plants (WWTPs) that receive wastewater flows from large geographic areas within the City: these areas, which typically include multiple neighborhoods, are referred to as WWTP service areas. The smaller geographic region within a WWTP service area in which all wastewater flows are conveyed to a single point, or outlet, before ultimately being conveyed to a WWTP, is typically referred to as a sewershed. The Gowanus Canal ~~water/sewershed~~ encompasses approximately 1,760 acres, of which approximately 1,600 acres are served by combined sewers that convey a combination of stormwater and sanitary sewage (combined sewer flow) dry weather flow and wet weather flow to two wastewater treatment plants (WWTPs): the Red Hook (RH) and Owls Head (OH) WWTPs. In periods of dry weather, the dry weather flow conveyed by the combined sewer system consists of ~~convey only~~ sanitary sewage. During and immediately after certain wet weather events, combined sewers can experience a much larger flow due to stormwater runoff collection. To control flooding at the WWTPs, as well as to protect drainage areas and private property, and prevent street flooding, structures known as regulators are built into the combined sewer system to serve as relief points. Regulators prevent excess flow from entering the interceptors, which are the larger sewers that convey wastewater to the WWTPs during wet weather events. The regulators allow two times the amount of a WWTP's design dry weather flow into the interceptors (the large sewers that bring the wastewater collected from the various smaller mains to the WWTPs for treatment); ~~However, when there is excess flow~~ flow exceeds two times the design dry weather flow, it is diverted by the regulator and ~~it runs~~ by gravity through an outfall, which constitutes a CSO. There are 12 combined sewer system outfalls that discharge to the Gowanus Canal (see **Figure 3**); these outfalls have permits from the New York State Department of Environmental Conservation (NYSDEC). The two largest CSO outfalls (by volume) are RH-034 and OH-007 in the RH and OH service areas, respectively.

7/20/2017



- Project Sites
- Gowanus Canal
- CSO Outfall
- Storm Outfall
- Red Hook Sewershed\*
- Owls Head Sewershed\*
- Pumping Station

\* Sewershed areas indicate the portions of the Gowanus Canal Watershed served by each WWTP



**Gowanus Canal CSO Facilities**

CSO and Stormwater Outfall Locations Along the Gowanus Canal  
**Figure 3**



### RED HOOK WWTP SERVICE AREA

The RH WWTP's service area is located in the northwest section of Brooklyn. As shown on **Figure 1**, the portion of the Canal's ~~water/sewershed~~ within the RH WWTP's service area is generally located to the north and west of the Canal; ~~along the northern end of the Canal~~, the service area also extends on to the east side of the Canal down to Carroll Street. Flow from this area is directed to the RH WWTP for treatment.

During certain wet weather events, combined flow from up to seven CSO outfalls is discharged to the Canal from the RH service area; Outfall with RH-034 being the largest discharges the greatest amount of CSO, as measured by activation frequency and overflow volume. RH-034 is located adjacent to the Gowanus Wastewater Pumping Station at the head of the Canal.

Wastewater flows are served by two pumping stations in the area: the Gowanus Wastewater Pumping Station and the Nevins Street Pumping Station (located on Nevins Street near the intersection of Degraw Street).

The Gowanus Wastewater Pumping Station and outfall RH-034 primarily receive flows from~~The neighborhoods north of the Canal are served by three major sewers serving neighborhoods north of the Canal. The capacity of the pumping station is 30 million gallons per day (MGD). that flow by gravity and converge at the pumping station and RH-034.~~ All dry weather and wet weather flow of up to 30 ~~mgd~~ MGD is directed to the RH WWTP through the pumping station. Flow from the pumping station is discharged directly to the ~~RH WWTP~~Columbia Street interceptor sewer via an existing force main. Peak wet weather flows that exceed the capacity of the pumping station are screened and discharged over a weir, which is a structure that regulates flow, to the Canal through outfall RH-034. Tide gates on the RH-034 outfall prevent water ~~from in~~ the Canal from backing up into the sewer system.

Four neighboring outfalls (RH-033, RH-036, RH-037, and RH-038) are located near RH-034 along the northeast bank of the Canal. These outfalls receive flows from a separate portion of the combined sewer system that is served by the Nevins Street Pumping Station. Local sewers connect to a sewer located along Nevins Street, which directs flows to the Nevins Street Pumping Station. The Nevins Street Pumping Station sends the collected flow to the interceptor upstream of the RH-034 regulator that leads to the Gowanus Pumping Station. Flows in excess of the Nevins Street Pumping Station's capacity (2 MGD) are directed by regulators along the Nevins Street sewer to the four outfalls, where they area discharged.

### OWLS HEAD WWTP SERVICE AREA

The OH WWTP's service area is located in the western section of Brooklyn. As shown on **Figure 1**, the portion of the Canal's ~~water/sewershed~~ within the OH WWTP's service area is located to the east of the Canal. Flow from this area is directed to the OH WWTP for treatment.

During certain ~~storm~~wet weather events, up to five CSO outfalls discharge to the Canal from the OH service area; Outfall with OH-007 being the largest discharges the greatest amount of combined sewer flow, as measured by typical year activation frequency and overflow volume. OH-007 is located ~~at the end of 2nd Avenue~~on the west side of the waterway and discharges ~~near just below~~ the 4th Street Turning Basin.

The OH-007 outfall receives flow from two major sewers, which run parallel to each other along 4th Avenue, between 7th Street and Carroll Street. The two sewer lines flow by gravity and combine at 7th Street into a combined sewer that extends southward to the North Interceptor. Two weirs are associated with OH-007. The first weir is located at the upstream (north) end of the combined sewer at 7th Street and 3rd Avenue. This weir diverts excess flow to a relief pipe and the OH-007 outfall. The second weir is located at the downstream end of the relief pipe at the OH-007 outfall. The 2nd Avenue Pumping Station

is also on the relief pipe. The pumping station pumps a small amount of flow back to the combined sewer, and excess flow discharges to the Canal via the second weir to a grit chamber (a structure that collects and removes materials such as silt, sand, and gravel) and then to the Canal. A tide gate on the OH-007 outfall prevents water ~~from in~~ the Canal from backing up into the sewer system.

There are eight additional outfalls that are connected to the same sewer network as OH-007 in the OH WWTP's service area. Four of these outfalls discharge to the Canal; three outfalls (OH-006, OH-024, and OH-026) are located downstream of OH-007; one outfall (OH-005) is located upstream of OH-007. The remaining four additional outfalls (OH-023, OH-002, OH-003, and OH-004) in the OH WWTP's service area discharge to the Gowanus Bay and Upper New York Bay.

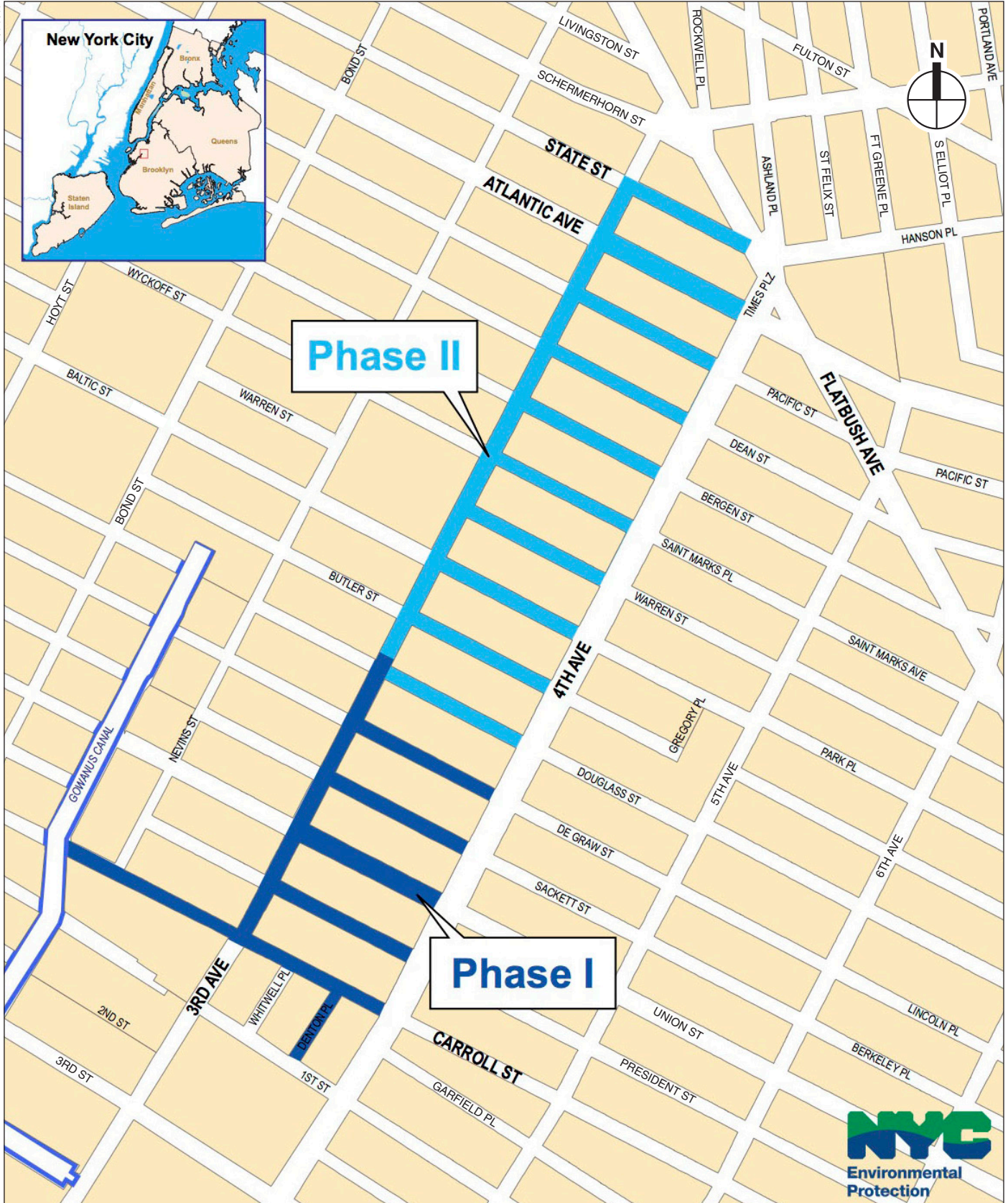
## RECENT DEP UPGRADES IN GOWANUS CANAL WATERSHED

~~Pursuant to a DEC CWA Consent Order (CSO Order)~~ As a result of the Gowanus Waterbody/Watershed Facility Plan (WWFP) discussed below, the City has upgraded the Gowanus Wastewater Pumping Station, which pumps wastewater to the RH WWTP, and has constructed a new mile-long force main from the pumping station to the Columbia Street/Red Hook Interceptor Sewer. Following these upgrades, the two largest CSO outfalls, by volume, are RH-034 and OH-007 in the RH and OH service areas, respectively. In addition, the City designed and completed additional improvements to the Flushing Tunnel in 2014 including ~~installing the installation of~~ new pumps that deliver an average flow of 215 million gallons per day (mgd/MGD) and new screens, and improving improvements to the hydraulic grade line ~~which that~~ results in more continuous pumping of fresh-oxygenated water to the Canal during low tide.

More recently, DEP has commenced construction and installation of High Level Storm Sewers (HLSS) in the Gowanus watershed area, which are generally located between Carroll Street and Bergen State Street near the northern end of the Canal, extending to 4th Avenue to the east (see Figure 4). ~~Once completed, the this HLSS project will create a separate stormwater discharge to the Canal through a stormwater outfall at Carroll Street and would reduce stormwater flows to the combined sewer system, which would reduce the frequency and volume of CSO into the Canal. The HLSS is a form of partial separation that separates stormwater from streets or other public rights-of-way from combined sewers. This Separation of sewers will would help reduce the amount of CSO solids that may be discharged to the Canal, and would alleviate-reduce street flooding. The first phase of the project (currently underway, with completion expected by the spring of 2018) includes improvements to the area south of Douglass Street; the second phase of construction (expected to begin in 2018 and completed in 2020) includes improvements to the area north of Douglass Street. As part of the project, 87 new catch basins will be installed to allow stormwater to drain from the streets into 14,000 linear feet of new high-level storm sewers. In addition, all existing catch basin drainage connections will be switched from the existing combined sewer to the new high-level storm sewers. ~~This will ensure that more wastewater gets routed to a wastewater treatment plant and reduces the frequency and volume of CSO into the Canal.~~~~

DEP has also invested in Green Infrastructure (GI) that has been constructed, is in construction, or is planned in the Gowanus watershed area, including bioswales in the right-of-way (ROWB) and stormwater greenstreets (SGSs) in the area north and east of the Canal (see Figure 5). GI uses vegetation, soils, and other elements and practices to capture, absorb, and filter stormwater. GI would also reduce the amount of CSO that may reach the Canal. ~~DEP anticipates that the GI Program will meet New York City requirements to manage the equivalent of one inch of rain on 10 percent of impervious surfaces in the combined sewer area throughout the City, and will continue to monitor and model GI penetration rates and make adjustments as needed for better efficiency.~~



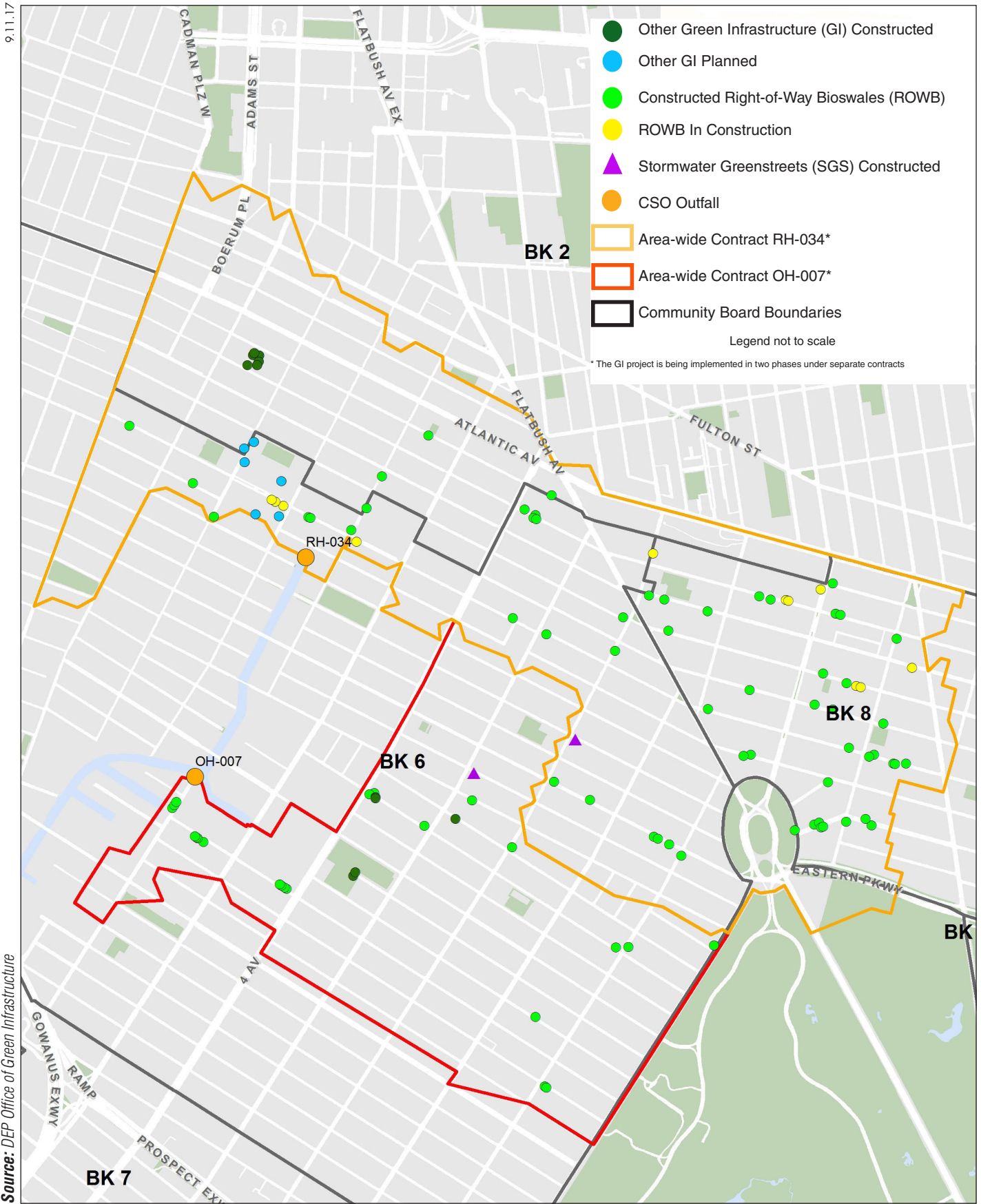


Source: Gowanus Canal LTCP



Gowanus Canal High Level Storm Sewers (HLSS)  
**Figure 4**





Source: DEP Office of Green Infrastructure

Green Infrastructure (GI) Projects in Gowanus Canal Watershed  
Figure 5



## GOWANUS CANAL WATERBODY/WATERSHED FACILITY PLAN AND LONG TERM CONTROL PLAN

In 2008, DEP prepared the ~~Gowanus Canal Waterbody/Watershed Facility Plan (WWFP)~~ Report to document baseline conditions and identify early action items for CSO abatement in advance of the development of a Long Term Control Plan (LTCP) to control CSOs ~~solids~~ being discharged into the waterbody. The WWFP assessed ~~the~~ compliance with existing water quality standards, and evaluated alternatives for meeting those standards. As a result of the WWFP, DEP committed to over \$250 million of capital upgrades: as noted above, improvements included upgrading the Gowanus Wastewater Pumping Station and modernizing the Flushing Tunnel. Concurrently with these upgrades, a Post Construction Compliance Monitoring (PCM) program was implemented to regularly collect samples from monitoring stations along the Canal and measure water quality. The PCM measures several markers of water quality, including levels of fecal coliform and enterococci (indicators of human waste and pathogenic bacteria), dissolved oxygen (DO; the oxygen in a waterbody available for aquatic life forms) and secchi disk transparency (the measure of clarity of surface waters, which affects the nutrient cycle by allowing in sunlight). For the period following the reactivation of the Flushing Tunnel (July 2014 to February 2015), the PCM data shows that these investments have resulted in substantial improvements in water quality in the Canal, with a reduction of fecal coliform and enterococci levels and improved DO concentrations.

In 2015, DEP prepared the LTCP for the Canal to identify the need for additional controls to achieve waterbody-specific water quality standards (WQS), consistent with Federal CSO Policy<sup>5</sup> and the water quality goals of the Clean Water Act (CWA). The LTCP includes alternatives that consider a wide range of reductions in CSO—up to 100 percent CSO control—including investments that would be made by DEP through green and grey infrastructure. Intermediate levels of CSO volume control—approximately 50 percent and 75 percent—were also evaluated. ~~The intermediate levels of CSO control—~~approximately 50 percent and 75 percent—were also evaluated. ~~analyzed in the LTCP were selected based on the CSO controls evaluated as part of the Superfund framework. The controls that were evaluated included construction of CSO storage tank facilities, a CSO control tunnel, and construction/installation of a fully separated stormwater sewer system in the Canal watershed/sewershed area.~~

The LTCP determined that the existing WQS are being met as a result of the significant improvements achieved by the WWFP recommended plan (i.e., operation of the reactivated Flushing Tunnel and upgraded Gowanus Wastewater Pumping Station). In particular, the LTCP determined that water quality in the Canal met the standards for its NYSDEC classification<sup>6</sup> and that fecal bacteria levels in the Canal met the WQS for primary recreational contact (recreational activities where the human body may come in direct contact with water, e.g., swimming or diving). ~~In addition, In consideration of the current attainment of WQS goals, the LTCP did not recommend the measures that feature higher costs and complexities of siting, construction, and operation (in particular, a CSO control tunnel or a fully separated stormwater sewer system) and therefore these measures were not considered viable on a cost performance~~

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<sup>5</sup> The 1994 USEPA CSO Control Policy provides guidance to permittees and permitting authorities on the development and implementation of a LTCP in accordance with the provisions of the CWA. The CSO policy was first established in 1994 and codified as part of the federal Clean Water Act in 2000.

<sup>6</sup> NYSDEC has designated the Gowanus Canal Class SD above Hamilton Avenue, and Class I below Hamilton Avenue. The best usage of Class SD waters is fishing; the best usage of Class I waters is secondary contact recreation (recreational activities where contact with the water is minimal and where ingestion of the water is not probable, e.g., boating) and fishing.

basis. ~~The LTCP also concluded that with the build-out of planned GI and HLSS in the area, water quality would further be improved.~~

Although existing WQS are being met, the USEPA ROD for the Gowanus Canal Superfund Site ~~instructs~~ directs the City to construct CSO controls that would serve to further improve water quality by reducing CSO ~~solids~~ from being discharged to the Canal.

### USEPA ROD AND CSO FACILITY SITING PROJECT

On March 2, 2010, the Canal was designated a federal Superfund site under CERCLA and placed on the ~~CERCLA~~ National Priorities List (NPL). The main goal of the CERCLA process is to remediate constituents of concern (certain hazardous substances) in the Canal sediments that were deposited over the Canal's long industrial history. On September 27, 2013, the USEPA issued a ROD identifying actions to be undertaken by various parties to remediate contamination in the Canal. Unlike the ~~CWAClean Water Act regulation of CSOs~~, which focuses on bacteria contamination and, DO, ~~and other parameters that affect human enjoyment and ecosystem well-being~~, ~~CERCLA the ROD~~ focuses on contamination caused by industrial pollutants. Accordingly, the USEPA ROD focuses on hazardous substances located in and beneath the Canal, primarily, ~~largely from the massive discharge of tarry wastes consisting of Non-Aqueous Phase Liquid ("NAPL") and associated polycyclic aromatic hydrocarbons ("PAHs"), which were primarily discharged to the Canal from National Grid's the three former MGPs, which that~~ operated for over a century along the bank of or near the Gowanus Canal. As part of the USEPA ROD, USEPA also mandated the construction of the Gowanus Canal CSO Facilities ~~and certain stormwater controls such as engineering controls at separated stormwater outfalls in order to manage solids to protect the remedy from urban stormwater runoff~~.

In February 2014, DEP released a siting and planning study for the two CSO facilities. This effort included: (1) identification and evaluation of CSO facility components and development of facility footprints to be used in the identification of viable sites on which to locate the facilities, including the CSO tanks, conveyance, and associated infrastructure; and (2) identification of potential sites suitable for locating the CSO facilities, development and evaluation of a shortlist of potential sites, and preparation of conceptual designs associated with those sites.

In May 2014, USEPA issued a unilateral Administrative Order for Remedial Design (RD Order) which established milestones for the City to design the two CSO facilities. DEP evaluated a range of tank sizes and alternatives and assessed their performance against the USEPA ROD goal of 58 to 74 percent solids load reduction. DEP submitted Site Recommendation Reports for the Head End and Owls Head Facilities to USEPA in June 2015, which evaluated potential sites for the two CSO facilities. The Site Recommendation Report for the Head End Facility evaluated two potential "shortlisted" sites for the Head End Facility—recommended a location, referred to as the Head End Canal-side Property, comprised of two privately owned parcels located at 242 Nevins Street and 234 Butler Street, and the Park Property, comprised of the City-owned Thomas Green Playground property—and recommended the Head End Canal-side Property as the location of the Facility. This recommendation also included use of the privately owned parcel at 270 Nevins Street for construction staging, referred to as the RH-034 Staging Area Property. The Site Recommendation Report for the Owls Head Facility recommended the use of a City-owned parcel of land located at 5th Street and 2nd Avenue, together with adjoining privately owned parcels along 5th Street, collectively referred to as the Owls Head Site.

On June 9, 2016, USEPA issued a memorandum to file that states that the size of the two storage tanks should be 8 MG at RH-034 and 4 MG at OH-007. Also on June 9, 2016, USEPA issued an Administrative Settlement Agreement and Order for Remedial Design, Removal Action and Cost Recovery (Settlement Agreement) directing DEP to construct the Head End Facility at the recommended



locations and requiring that DEP issue a DEIS for the Head End Facility by October 1, 2017. However, under the Settlement Agreement, under certain specified circumstances, USEPA retains the discretion to direct the City to construct the Head End Facility at an alternate site—the City-owned Thomas Greene Playground property, referred to as the Park Property (see **Figure 6**). In the Settlement Agreement, USEPA also agreed with DEP’s recommended site for the Owls Head Facility.

## INVESTIGATION AND REMEDIATION OF UPLAND SOURCES OF CONTAMINATION

According to the USEPA ROD, Contaminants from upland sources along the Canal—including the Fulton Municipal Works MGP site, Carroll Gardens/Public Place (formerly known as the Citizens Gas Works MGP site), and the Metropolitan MGP site (see **Figure 7**) have travelled to—are transported into the Canal primarily by the migration of nonaqueous phase liquid (NAPL) through subsurface soils and groundwater discharge of dissolved-phase contaminants. Although the MGP sites discontinued operations several decades ago, these contaminants continue to migrate into and impact the Canal. The investigation and remediation of these upland sources of contamination, including properties within National Grid’s Remedial Investigation Parcel Boundaries, are currently being to be addressed pursuant to administrative orders under the jurisdiction of NYSDEC in coordination with the remediation required under CERCLA. NYSDEC has issued a Record of Decision (NYSDEC ROD) that selected near- and long-term actions intended to prevent the migration of contamination from the former Fulton MGP site into the Canal, protect human health and the environment, and comply with New York State standards, criteria, and guidance.

The properties where the Head End Facility would be sited are located within National Grid’s NYSDEC-directed Remedial Investigation study area and—National Grid is responsible for the remediation of NAPL and other CERCLA hazardous substances at the Head End Facility properties. National Grid’s remediation is outside the scope of this Project, and at this time, there is not sufficient information available concerning National Grid’s independent of remediation required under CERCLA and the Project. Given that these investigation and remediation efforts to enable them to be considered in this environmental review are ongoing, any relevant information that becomes available will be used, as appropriate, to inform the Project.

## C. DESCRIPTION OF THE PROJECT

### HEAD END SITE AT RH-034

The Project would include construction of the Head End Facility at 242 Nevins Street and 234 Butler Street with a construction staging area at 270 Nevins Street (collectively, the Head End Site), bounded by the Gowanus Canal, Butler Street, Nevins Street, and Sackett Street. The design for the Facility is currently under way, and is expected to consist of an approximately 52,000-square-foot (sf) below-grade structure containing the 8-MG tank and tank system to capture 82 percent of solids, and an approximately 25,700 sf, two-story above-grade structure housing the screening equipment, electrical equipment, odor control system, emergency generator, and crew areas. The above-grade structure would be located at the northern end of the site, with the remainder of the surface area on the site expected to be paved and accessible for maintenance and operations with landscaping and public space provided where appropriate. The design would include a 50-foot setback from the bulkhead wall, and may would provide some form of waterfront public access. The surface layout of the Head End Site is currently being designed; the design of additional public access areas and/or public amenities provided on the site will be subject to review by New York City Parks and Recreation (NYC Parks), which includes consultation with the local

8/9/2017



- Gowanus Canal
  - Head End Facility Alternative Site
  - Park Property Alternative
  - Outfall Locations
- Gowanus Canal CSO Facilities**

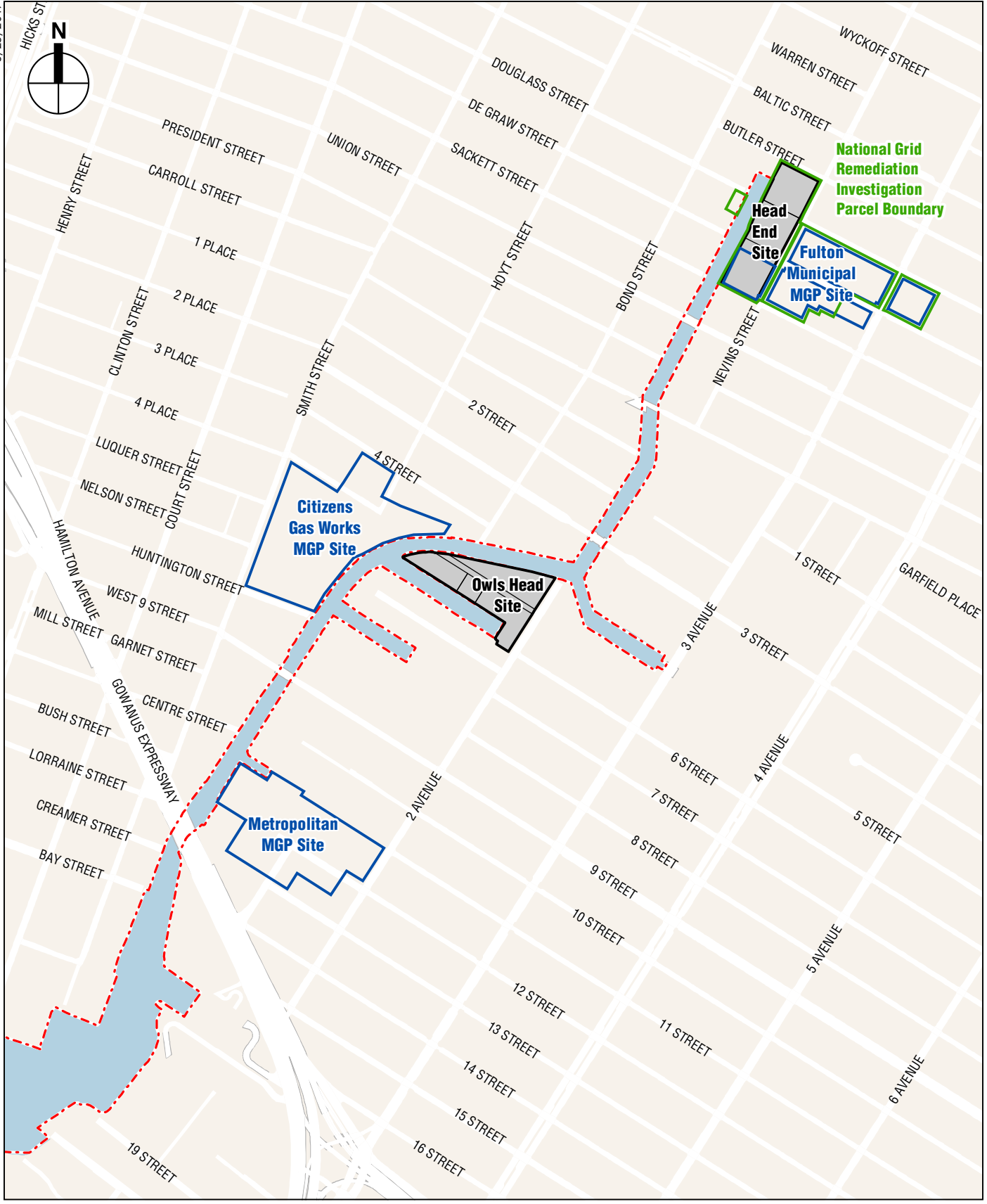
- In-street Sewer Line Improvements
- RH-034 Construction Staging Area\*

\*NOTE: RH-034 Construction Staging Area Property would be used for both the Project and the Park Property Alternative

0 500 FEET

Head End Facility Alternative Site  
**Figure 6**

8/25/2017



-  Project Sites
-  Former MGP Sites (Approximate)
-  Gowanus Canal
-  National Grid Remediation Investigation Parcel Boundary





community. Construction of the Head End Facility is expected to take approximately ~~five~~ seven years. Note this timeframe represents the cumulative total of DEP work at the Head End Site; there will be a period between the initial DEP site work and when the tank is constructed when National Grid is responsible for remediation of the site, so the overall work at the site would be of longer duration.

In order to divert the flow from the RH-034 outfall to the Head End Facility, modifications would be made to the existing RH-034 regulator structure, including the installation of new bending weirs and replacement of the tide gates. Routing of additional sewer system flows to the Head End Facility, including wet weather flows from adjacent outfalls (RH-033, RH-037, RH-038, and RH-036), would be accomplished by constructing a new sewer on Nevins Street from the intersection with Sackett Street to the intersection with Butler Street. In addition, the associated CSO regulators for these outfalls, located in Nevins Street, would be completely upgraded. Outfalls RH-037 and RH-036, together with outfall RH-034, would remain open and would be used as flood relief outfalls. Outfall RH-033, which is located on the Head End Site, would be closed. ~~would be determined during design, but may, in addition to flows from RH-034, include the elimination and diversion of flow from an outfall that runs through the Head End Site (RH-033) as well as potential diversion of flows from two other nearby outfalls (RH-038 and RH-037).~~ The Nevins Street Pumping Station and force main would be eliminated ~~may also be rehabilitated or relocated to the Head End Site~~ and the outfall pipe for the RH-038 outfall (on Degraw Street, between the intersection with Nevins Street and the Canal) would be replaced. During wet weather events, flow would be conveyed to the Head End Site by gravity, collected and retained in the storage tank, then pumped to the Gowanus Wastewater Pumping Station for delivery to the Red Hook WWTP once there is sufficient downstream capacity in the sewer system. As the tank is emptied, accumulated solids would be flushed out and removed.

The flow-through design capacity for the facility is 323 million gallons per day (MGD). During wet weather events, if flows to the facility are within the design capacity of the Facility (i.e., up to 323 MGD), after the 8 MG tank is full Excess flow (i.e., when flow exceeds the 8 MG capacity of the tank) flow would continue to be directed to the Facility. The excess flows would pass through the Facility and receive limited primary treatment via screening and settling before being and would discharge via effluent weirs to an effluent channel, which receives limited primary treatment via screening and settling. The excess flows would then be discharged to a new conduit in Degraw Street to the RH-038 regulator and outfall and through one of the nearby outfalls (RH-034 or RH-038) to the Canal. The flow stored in the 8-MG tank would continue to be discharged to the sewer system and to the Red Hook WWTP following the wet weather event. During wet weather events that result in flows exceeding the design capacity of 323 MGD, excess flows would be divert upstream of the facility and would discharge via bending weirs to an overflow channel and into the Canal through the existing RH-034 outfall. The Head End Facility would reduce the CSO volume discharged from outfall RH-034 during a typical year is expected to be reduced by approximately 76 percent, from 137 MG to 33 MG and solids by 82 percent.

#### **OWLS HEAD SITE AT OH-007**

The Project would include construction of the Owls Head Facility on five parcels: 2 2nd Avenue (Block 977, Lot 3), 110 5th Street (Block 990, Lot 21), 122 5th Street (Block 990, Lot 16), 22 2nd Avenue (Block 990, Lot 1), and 5th Street (Block 977, Lot 1), with portions of this area used for construction staging (collectively, the Owls Head Site). The site is bounded by the Gowanus Canal and 2nd Avenue near the 6th Street turning basin. As with the Head End Site, the Owls Head Site is currently in design, but is expected to consist of an approximately 31,000 sf below-grade structure containing the 4-MG tank and tank system, and an approximately 17,600 sf, two-story above-grade structure housing the screening equipment, electrical equipment, odor control system, emergency generator, and crew areas. A portion of the site (Block 977, Lot 3) contains a New York City Department of Sanitation (DSNY) facility that

would be incorporated at the Owls Head Facility; the property is also used periodically by a local non-profit environmental group, the Gowanus Canal Conservancy (GCC), for environmental education and stewardship events, including composting operations. The five parcels where the Project would be located would accommodate both the existing DSNY facility and the Owls Head Facility, and -is also expected to be accessible for GCC activities following construction of the Owls Head Facility. The remainder of the site is expected to be paved and accessible for maintenance and operations with landscaping where appropriate. DEP is also evaluating the potential for the site to include accessible waterfront open space where it does not interfere or conflict with the operation of the Owls Head Facility.

Construction at the Owls Head Site would include upgrades to existing sewer infrastructure in the area. In particular, an existing regulator (the 2nd Avenue Regulator, located just north of the 2nd Avenue and 5th Street intersection) would be replaced with a new 2nd Avenue regulator and the existing outfall (OH-007, located at the end of 2nd Avenue) would be demolished, and a new regulator and outfall would be constructed to handle the design flow rates of the Owls Head Facility. Other existing sewer infrastructure, including the existing grit chamber, outfall (OH-007, located at the end of 2nd Avenue), and In addition, the 2nd Avenue Pumping Station located adjacent to the site, would be demolished and a new, similar pumping station would be constructed adjacent to or within the Owls Head Site and removed. A new outfall and a new, similar pumping station with a 1 MGD capacity would be constructed within the Owls Head Facility. In addition, the existing bulkhead at the Owls Head Facility would be replaced. Construction of the Owls Head Facility is expected to take approximately ~~five~~ seven years.

Operation of the Owls Head Facility would be similar to that of the Head End Facility, with flow conveyed to the facility by gravity, collected and retained in the storage tank, and then pumped to the Owls Head Interceptor through an existing regulator located at the intersection of 3rd Avenue and 7th Street. A new force main would be constructed to connect the facility to the Owls Head Interceptor for delivery of flow to the Owls Head WWTP once there is sufficient downstream capacity in the sewer system. As the tank is emptied, accumulated solids would be ~~removed on site~~ flushed out and removed.

The flow-through design capacity for the Owls Head Facility is 146 MGD. During wet weather events, if flows to the Facility are within the design capacity of the facility (i.e., up to 146 MGD), after the 4-MG tank is full Exeess flow (i.e., when flow exceedsing the capacity of the 4-MG tank) flow would continue to be directed to the Facility. The excess flows would pass through the facility and would discharge via effluent weirs to an effluent channel, and-which receives limited primary treatment via screening and settling. The excess flows would then be before being discharged through thea new OH-007 outfall to the Canal. The flow stored in the 4-MG tank would continue to be discharged to the sewer system and to the Owls Head WWTP following the wet weather event. The existing outfall would remain in service during construction and would be closed off once the Owls Head Facility is operational. A tide-gate system would be installed to prevent the Canal from backing up into the tank or the new 2nd Avenue Pumping Station. As with the Head End Facility, during wet weather events that result in flows exceeding the Facility's design capacity of 146 MGD, excess flows would be diverted upstream of the Facility and would discharge via a bending weir located in the influent channel directly to the Canal through the new OH-007 outfall. The Owls Head Facility would reduce the CSO volume discharged from outfall OH-007 during a typical year by approximately 85 percent, from 58 MG to 9 MG ~~and solids by 87 percent.~~

Finally, both the Head End and Owls Head Facilities would be largely automated and would not require permanent staffing, although workers would access the facilities to perform regular maintenance. Both Facilities are expected to be in operation approximately 40 to 50 times per year, and overflow events (where excess flows would pass through the Facilities and receive some primary treatment before being discharged into the Canal) are expected to occur infrequently (approximately six times per year at RH-034 and five times per year at OH-007).

## D. PURPOSE AND NEED

The purpose and need of the Project is to ~~conform to comply with~~ the USEPA ROD requirement to construct the two CSO Facilities described herein ~~prevent recontamination of the Canal following the implementation of remedial actions.~~ Upland sources of hazardous substances, including discharges from three former MGPs, CSOs ~~solids from discharges,~~ and other specified contaminated upland areas and unpermitted pipes along the Canal, must be addressed prior to the commencement of, or in phased coordination with, the implementation of the selected remedy. ~~In accordance with the USEPA ROD, as stated above, DEP will design and construct two CSO facilities.~~

To support the construction of the Head End Facility, DEP must acquire two parcels located at 242 Nevins Street and 234 Butler Street (the Head End Canal-side Property) to accommodate the Head End Facility, and lease or acquire one parcel located at 270 Nevins Street to use as a construction staging area (RH-034 Staging Area Property). To support the construction of the Owls Head Facility, DEP must acquire up to four parcels located at 110 Fifth Street, 122 Fifth Street, 22 2nd Avenue, and 5th Street (Owls Head Staging Area Property) adjacent to the Canal.

~~Although DEP is seeking Both of the sites require NYC-ULURP approval for site selection and acquisition for both of the sites, DEP will undertake, but will undergo~~ ULURP at different times ~~due to having different~~ based on their independent design and construction schedules. For the Head End Facility, in addition to the ULURP approval for site selection and acquisition, the ULURP would include DEP will be pursuing a ULURP approval for an amendment to the City Map involving the elimination of Douglass Street between the Canal and Nevins Street. This ~~demapping~~ is not necessary for the project, but reflects that, but is a component of due diligence for the City of New York with the acquisition of the property and the construction of the Head End Facility, the street would not be built, and the ULURP for demapping will follow the ULURP for site selection and acquisition. Similarly, for the Owls Head Facility, ULURP would include an amendment to the City Map involving the elimination of 5th Street between 2nd Avenue and the Canal.

~~While the Head End Facility is not subject to Fair Share due to there being no Site Selection approval, there will be a discussion in the DEIS of the consideration of Fair Share criteria for acquisition of the site.~~

## E. PROJECT APPROVALS AND COORDINATION

Implementation of the Project would require federal, state and local permits/approvals, or their equivalents under CERCLA. DEP would closely coordinate with USEPA, NYSDEC, New York State Department of State (NYSDOS), New York State Parks, Recreation and Historic Preservation (OPRHP), and New York City agencies as necessary for the Project.

~~The Project would also require property acquisition.~~

**Table 1** includes the major permits, approvals, or their equivalents under CERCLA that may be required for the Project.

**Table 1**

**Potential Major Permits, Approvals or Equivalants, Consultation, and Coordination<sup>1</sup>—  
Gowanus Canal CSO Facilities**

Agency/Entity	Permit/Approval/Consultation/Coordination
<b>FEDERAL</b>	
U.S. Environmental Protection Agency (USEPA)	CERCLA coordination and consultation
Coastal Zone Management Act	Projects affecting New York’s coastal zone must be consistent with the Coastal Zone Management Act, through the New York State Department of State’s Coastal Management Program and approved Local Waterfront Revitalization Plans
U.S. Army Corps of Engineers (USACE)	Permits under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act
United States Fish and Wildlife Service (USFWS)	Consultation under Section 7 of the Endangered Species Act; Biological Assessment; Federal Fish and Wildlife Permit
Advisory Council on Historic Preservation	Consultation under Section 106 of the National Historic Preservation Act of 1966
<b>STATE</b>	
New York State Department of State (NYSDOS)	Coastal Zone Management Consistency
New York State Department of Environmental Conservation (NYSDEC)	State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity - GP-0-10-001: erosion and sediment control and post-construction stormwater management in accordance with the stormwater pollution prevention plan (SWPPP)
	Individual SPDES Permit or Application Form NY-2C for Industrial Facilities (Dewatering activities requiring discharge to surface water)
	Modification to a SPDES Permit (Individual Permit) for Discharge of Wastewater from Publicly Owned Treatment Works (NY-2A) to remove inactive outfalls
	Tidal Wetlands Permit
	Long Island Well Permit and Approval of Completed Works
	Protection of Waters Permit Navigable Waters (Excavation or Fill)
	Section 401 Water Quality Certification
New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP)	Natural Heritage Program Consultation—consultation to determine potential presence of threatened or endangered species listed in New York State
New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP)	Consultation to determine potential presence of archaeological and/or historic resources and determine project’s potential effects
<b>NEW YORK CITY</b>	
New York City Department of City Planning (DCP)	ULURP for <u>site selection</u> , property acquisition, <u>and an</u> amendment to the City Map (street demapping for due diligence— <del>not required to build the Project</del> ), and potential <del>site selection and zoning approvals.</del> <sup>2</sup> New York City Waterfront Revitalization Program—Consistency Assessment
<b>Note:</b>	
<sup>1</sup> Includes documentation of regulatory compliance under CERCLA through equivalent review by responsible agencies.	
<sup>2</sup> <del>ULURP for property acquisition and street demapping (Douglass Street) would be required for the Head End Facility. The Owls Head Facility would have a separate ULURP for property acquisition at a later time, and may potentially also require site selection and street demapping actions.</del>	

## F. SCOPE OF THE ENVIRONMENTAL IMPACT STATEMENT

### METHODOLOGY

The purpose of the DEIS is to provide a discussion of the potential significant adverse environmental impacts associated with implementation of the Project and to the maximum extent <sup>3</sup>practicable, avoid or mitigate such impacts, consistent with social, economic, and other essential considerations. The 2014 *City Environmental Quality Review (CEQR) Technical Manual* will be used to evaluate the Project’s impacts.



Each impact analysis will include an inventory of existing conditions establishing a baseline against which future conditions can be projected (Existing Condition). In addition, each impact analysis will include a determination of future conditions known to occur or expected to occur in the future regardless of the Project (Future Conditions in the Analysis Year or the Future without the Project). Clean-up activities required by USEPA or NYSDEC or other parties, such as the installation of the containment/cutoff wall, the excavation or stabilization of MGP-related contamination on shared parcels, the dredging of the Canal, the restoration of the 1st Street and 4th Street turning basins, and the installation of coal tar extraction wells, would be presented as part of the Future Conditions in the Analysis Year.

Finally, each impact analysis will include an analysis of the Project's likely effects on its environmental setting (Probable Impacts of the Project) in the expected year of completion (Analysis year). The Project's expected year of completion is 2028~~6~~.

The DEIS will contain:

- A description of the Project and the environmental setting;
- A description of the methodologies utilized for each technical area;
- A statement of the potential significant adverse environmental impacts of the Project;
- An identification of any potential significant adverse impacts that cannot be avoided if the Project is implemented;
- An identification of irreversible and irretrievable commitments of resources that would be involved if the Project is built; and
- A description of measures proposed to minimize or fully mitigate any potential significant adverse environmental impacts.

The first step in preparing the DEIS document is the public scoping process. Scoping, or creating the scope of work, is the process of focusing the environmental impact analysis on the key issues relevant to the Project. The DEIS will be based on the scope of work and will be subject to public review, including a public hearing and a period for public comment. After the public comment period on the DEIS closes, a Final EIS (FEIS) will be prepared, including a summary of the comments and responses on the DEIS and any revisions to the DEIS. DEP, as lead agency, will then prepare a Statement of Findings that describes the environmental impacts of the Project and any required mitigation.

The proposed scope of work for each of the technical areas to be analyzed in the DEIS is described below. Where applicable, a comparative analysis of feasible alternatives will be performed and presented in an Alternatives chapter of the DEIS. The methodologies utilized for each analysis will be presented in each respective chapter in the DEIS.

## **PROJECT DESCRIPTION**

The first chapter of the DEIS introduces the reader to the Project and sets the context in which to assess impacts. The chapter will contain a detailed description of the proposed CSO facilities; the background and history of the Project, including a summary of the legal framework; previous investigations and actions; and a statement of purpose and need and anticipated benefits of the Project. The chapter will also include a discussion of the approvals required for the Project, including other discretionary actions and equivalent review by responsible agencies under CERCLA, as well as procedures to be followed and the role of the DEIS in the process.

In addition, the Project description will include a discussion of key Project elements at both the Head End and Owls Head Sites, such as site plans and elevations, landscape plans, access and circulation, treatment techniques, and other Project components.

## LAND USE, ZONING, AND PUBLIC POLICY

A land use analysis characterizes the uses and development trends in the area that may be affected by a proposed project and determines whether a proposed project is either compatible with those conditions or whether it may affect them. Similarly, the analysis considers the project's compliance with, and effect on, the area's zoning and other applicable public policies. Following *CEQR Technical Manual* guidelines, the land use, zoning, and public policy analysis will be conducted within a study area extending 400-600 feet from each facility (see **Figure 8**): in response to public comments on the Draft Scope of Work, the study area boundary was extended from 400 feet to 600 feet to incorporate additional properties near the Head End Site and the Owls Head Site that may be affected by the Project. The boundaries have been chosen to include those communities and uses that could potentially be affected by the Project. Key issues include the compatibility of the proposed use with existing patterns of development, nearby residences and commercial facilities; the Project's consistency with underlying zoning, and officially approved or adopted future plans and programs, such as potential future zoning changes affecting the Project site and the study area; and the Project's potential effects on sensitive uses and neighborhood activity patterns.

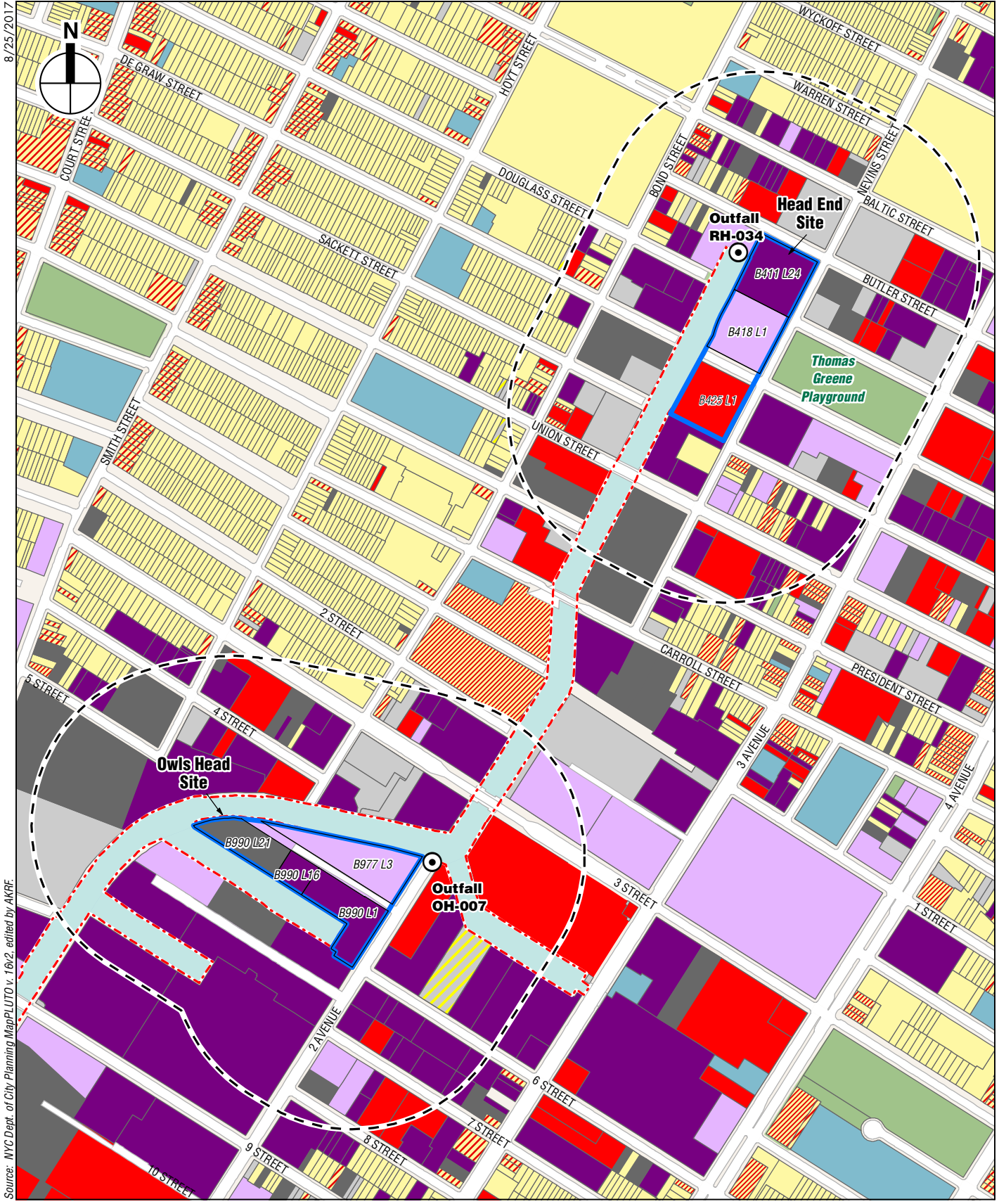
The land use analysis will characterize the uses and development trends in the area that may be affected by the Project, describe the public policies that guide development, and determine whether the Project is compatible with those conditions and policies or whether it may affect them. In addition to considering the Project's effects in terms of land use compatibility and trends in zoning and public policy, this chapter will also provide a baseline for other analyses. The land use chapter will provide the following:

- A brief development history of the sites and the study area. The study areas will include the CSO facility sites and staging areas and a radius of approximately 400-600 feet around these areas;
- Describe conditions in the study areas, including existing uses and the underlying zoning;
- Describe land use patterns in the study areas, including recent development trends;
- Describe existing zoning and recent zoning actions, if any, in the study areas;
- Describe other public policies that may apply to the study areas, including any formal neighborhood or community plans;
- Identify other future projects in the study areas that would be completed by the analysis year. Describe how these projects would affect land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study areas, including plans for public improvement; and
- Assess the impacts of the Project on land use and land use trends, zoning, and public policy. Project impacts related to issues of compatibility with surrounding land use, consistency with zoning and other public policies, and the effect of the Project on development trends and conditions in the area will be assessed.

The Project sites are located in the Coastal Zone; therefore, an assessment of the Project's consistency with the Waterfront Revitalization Program (WRP) will be prepared.

## SOCIOECONOMIC CONDITIONS

The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. According to the *CEQR Technical Manual*, the six principal issues of concern with respect to



Source: NYC Dept. of City Planning MapPLUTO v. 16/2, edited by AKRF.

- Project Sites
- Study Areas (600-foot boundaries)
- Gowanus Canal
- Commercial and Office Buildings
- Hotels
- Industrial and Manufacturing
- Open Space and Outdoor Recreation
- Parking Facilities
- Public Facilities and Institutions
- Residential
- Residential with Commercial Below
- Transportation and Utility
- Vacant Land
- Vacant Building
- Under Construction
- Outfall Locations

**Gowanus Canal CSO Facilities**

Existing Land Use  
**Figure 8**

socioeconomic conditions are whether a proposed project would result in significant impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement due to increased rents; (5) indirect business displacement due to retail market saturation; and (6) adverse effects on a specific industry. The DEIS will include a preliminary screening assessment of the Project's potential to affect any of these issues of concern. Based on the preliminary screening assessment, if it is determined that the Project would exceed any of the thresholds warranting a detailed analysis presented in the *CEQR Technical Manual*, a detailed analysis will be prepared. ~~The DEIS will also include an assessment of how the Project could affect water and sewer rates for DEP customers.~~

## COMMUNITY FACILITIES AND SERVICES

The demand for community facilities and services is directly related to the type and size of the new population generated by any proposed development. New workers tend to create limited demands for community facilities and services, while new residents create more substantial and permanent demands. The DEIS will include a preliminary screening assessment of the Project's potential to affect community facilities. As the Project would not introduce a new residential population, a detailed analysis of the Project's potential to affect community facilities—including schools, child care facilities, libraries, police/fire protection services, and health care facilities—is not expected to be warranted. This chapter will include an assessment of the Project's potential to adversely affect DSNY operations and GCC activities at the Owls Head Site, both during construction and operation of the Owls Head Facility.

## OPEN SPACE

The *CEQR Technical Manual* recommends performing an open space assessment if a project would have a direct or indirect effect on an area open space. The Project would not introduce a new residential or non-residential population warranting an analysis of indirect effects. An assessment of the Project's direct effects on area open spaces resulting from operation of the facilities will be provided (i.e., if relevant, potential increases in noise, air pollutants, or shadows from the Project on adjacent public open spaces will be assessed).

## SHADOWS

The *CEQR Technical Manual* requires a shadows assessment for proposed projects that would result in new structures (or additions to existing structures) greater than 50 feet in height or located adjacent to, or across the street from, a sunlight-sensitive resource. Such resources include publicly accessible open spaces, sunlight-sensitive natural features, or historic resources with sun-sensitive features.

The Project would result in new structures (the above-grade portion of the CSO facilities) adjacent to the Gowanus Canal, which is considered a sunlight-sensitive natural resource, since altering the shadows on the Canal may alter its condition or microclimate. The facility at the Head End Site would also be adjacent to a publicly accessible open space (the Thomas Greene Playground). A shadows assessment is therefore required to determine how the Project-generated shadows might affect these resources.

The shadows assessment will follow the methodology described in the *CEQR Technical Manual*, and will include the following tasks:

- Develop base maps illustrating the Project sites in relationship to natural features in the area, and any publicly accessible open spaces or historic resources with sunlight-dependent features;
- Determine the longest possible shadow that could result from the Project to determine whether it could reach any sunlight-sensitive resources at any time of year;



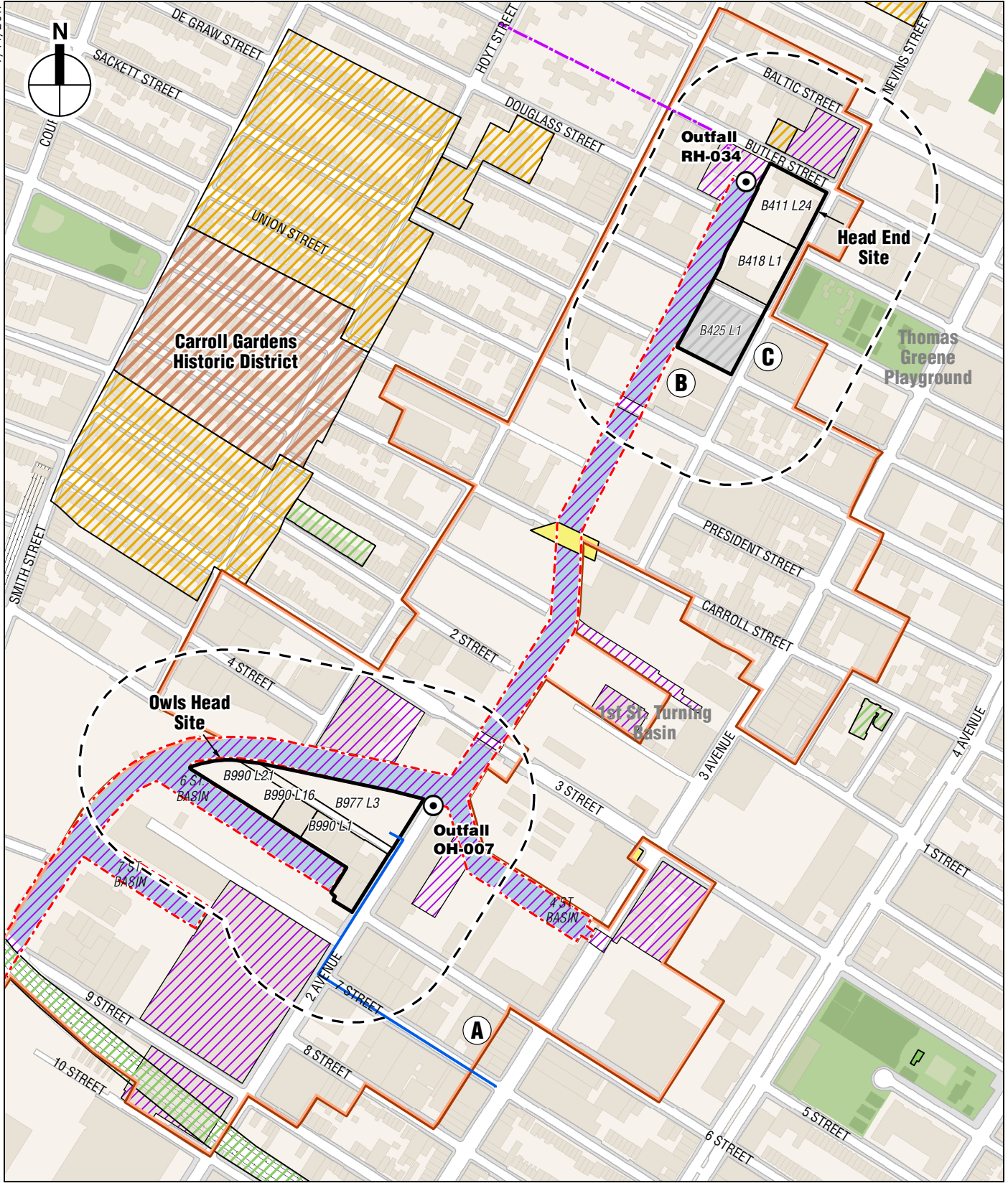
- Develop a three-dimensional computer model of the elements of the base maps developed in the preliminary assessment;
- Develop three-dimensional representations of the proposed facilities;
- Using three-dimensional computer modeling software, determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the Project on four representative days of the year;
- Document the analysis with graphics comparing shadows resulting from the Future Conditions in the Analysis Year with shadows resulting from the proposed facilities, with incremental shadow highlighted in a contrasting color. Include a summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource; and
- Assess the significance of any shadow impacts on sunlight-sensitive resources. If any significant adverse shadow impacts are identified, identify and assess potential mitigation strategies.

## **HISTORIC AND CULTURAL RESOURCES**

The *CEQR Technical Manual* identifies historic and cultural resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic and cultural resources include designated New York City Landmarks (NYCLs) and Historic Districts; properties calendared for consideration as NYCLs by the New York City Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation (NYCL-eligible); properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing (S/NR-eligible), or properties contained within a S/NR listed or eligible district; properties recommended by the New York State Board for listing on the S/NR; National Historic Landmarks (NHLs); and potential historic resources (i.e., properties not identified by one of the programs listed above, but that appear to meet their eligibility requirements).

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if there is the potential to affect either archaeological or architectural resources. The proposed CSO facility sites are located within the formerly proposed Gowanus Canal Historic District (S/NR-eligible) and are adjacent to contributing architectural resources within the 2004 eligible Historic District (see **Figure 9**). Additional historic resources in the area of the Project sites include the American Society for the Prevention of Cruelty to Animals (ASPCA) building at 233 Butler Street and the Gowanus Canal bulkhead (both S/NR eligible). The CSO facility sites may also be sensitive for archaeological resources, subject to further consultation with LPC and OPRHP. A historic and cultural resources analysis will be prepared consistent with the *CEQR Technical Manual*, which will include the following:

- Assess for the potential for archaeological resources on the CSO facility sites in consultation with LPC and OPRHP. If necessary, a Phase 1a Archaeological survey of the sites will be prepared and, based on a review by LPC and OPRHP, conclusions and recommendations will be summarized. If any additional archaeological investigations are required (e.g., Phase 2 testing and Phase 3 Data Recovery) and completed during the environmental review, the conclusions and recommendations of these investigations will be summarized in the DEIS; if work cannot be completed until after environmental review, the commitments to undertake necessary steps with appropriate consultation will be summarized. All archaeological reports and protocols will be submitted to OPRHP and LPC for review and comment and all agency comment letters will be included as an appendix;
- Coordinate as necessary with National Grid regarding existing and planned investigations in the vicinity of the Project sites;



**Legend**

- Project Sites
- Gowanus Canal
- Study Area (400-foot boundary)
- Construction Staging Areas
- New Force Main
- Contributing Feature to the Gowanus Canal HD, per ACOE Assessment of Eligibility
- New York City Landmark and S/NR-Eligible
- Contributing Feature to the 2004 Gowanus Canal Historic District (S/NR-Eligible)\*
- New York City Landmark and S/NR-Listed
- S/NR-Eligible
- S/NR-Eligible and NYCL-Eligible
- S/NR-Listed
- 2014 Proposed S/NR Gowanus Canal Historic District (The NYS Board for Historic Preservation review has been postponed.)

**Archeological Sites**

- (A)** Possible Revolutionary War Burial Ground Site
- (B)** Dentons Mill Site
- (C)** Freekes Mill Site

\* Includes the Gowanus Canal, a contributing feature to the Historic District

**Gowanus Canal CSO Facilities**

Historic Resources  
**Figure 9**

- Based on other planned development projects, qualitatively discuss any impacts on architectural and archaeological resources that are expected in the Future Conditions in the Analysis Year;
- Initiate project consultation with OPRHP via the Agency’s Cultural Resource Information System. Information to be provided will include a description of the Project, maps and photographs of the Project sites and surrounding area, and a description of any adjacent properties that are more than 50 years old;
- Map and briefly describe designated architectural resources within the 400-foot study areas surrounding each site;
- Consistent with the *CEQR Technical Manual*, conduct a field survey of the study areas to identify any potential architectural resources that could be affected by the Project. The field survey will be supplemented with research at relevant repositories, online sources, and current sources prepared by OPRHP and LPC;
- Seek determinations of eligibility from LPC and OPRHP for any potential architectural resources. Map and describe any identified architectural resources.
- Assess the potential for the Project to have direct, physical impacts on architectural and archaeological resources. Assess the Project’s potential to result in any visual and contextual impacts on architectural resources. Potential impacts will be evaluated through a comparison of the Future Conditions in the Analysis Year and the Probable Impacts of the Project. The analysis will include a description of the consultation undertaken with OPRHP and LPC; and
- Identify any measures that would be necessary to mitigate and/or reduce any potential significant adverse impacts on historic or cultural resources, in consultation with LPC and OPRHP.

## **URBAN DESIGN AND VISUAL RESOURCES**

According to the methodologies of the *CEQR Technical Manual*, if a project would result in physical changes which could be observed by a pedestrian from street level and could potentially change or restrict significant views of visual resources, a preliminary assessment of urban design and visual resources should be prepared. Only projects that result in physical alterations beyond that allowed by zoning (i.e., projects that include modifications to zoning requirements relating to yard, height and setback, or built floor area) require an assessment. The DEIS will include a preliminary screening assessment of the Project’s potential to affect the urban design and visual resources of the study area. A detailed analysis will be prepared if warranted based on the preliminary assessment.

## **NATURAL RESOURCES**

An assessment of natural resources is conducted when a natural resource is present on or near a development site and the project may involve the direct or indirect disturbance of that resource. The *CEQR Technical Manual* defines natural resources as water resources, including surface water bodies and groundwater; wetlands, including freshwater and tidal wetlands; terrestrial resources, such as grasslands and thickets; shoreline resources, such as beaches, dunes, and bluffs; gardens and other ornamental landscaping; and natural resources that may be associated with built resources, such as old piers and other waterfront structures. The Project would result in the demolition of existing structures and clearing of the Head End and Owls Head Sites, which feature limited natural resources. A screening evaluation will be performed to characterize existing natural resources on the sites based on site reconnaissance, review of existing information, and consultation with responsible agencies, including NYSDEC, USFWS, and the National Marine Fisheries Service (NMFS). Potential impacts, including those to ecological communities and wildlife due to removal of existing vegetation, and potential impacts to aquatic resources due to construction and operation of a proposed new DEP outfall, including beneficial effects to water quality of



the Gowanus Canal, will be assessed, and any requirements for replacement of resources will be described. If warranted based on further design of the facilities and in consultation with the responsible agencies, a detailed analysis of the Project's impacts on natural resources will be prepared, and measures that would be developed, as necessary, to mitigate and/or reduce any of the Project's potential significant adverse impacts on natural resources will be described.

## **HAZARDOUS MATERIALS**

According to the *CEQR Technical Manual*, a hazardous materials assessment should be conducted when elevated levels of hazardous materials exist on a site, when a Project would increase pathways to their exposures, either human or environmental, or when an action would introduce new activities or processes using hazardous materials, thereby increasing the risk of human or environmental exposure.

The Head End Site is located within National Grid's Remedial Investigation Parcel Boundaries for the former Fulton MGP site; the construction staging area at the Head End Site is also located on the former Fulton MGP site (see **Figure 7**). This plant operated from approximately 1879 until 1929 making town gas, a predecessor to natural gas. The MGP processes frequently lead to extensive contamination of soil and groundwater by coal tar and other contaminants. National Grid is the successor company to the owners/operators of the Fulton MGP and entered into agreements with NYSDEC to investigate and address the contamination. In 2015, NYSDEC issued a ROD requiring National Grid, independent of the Project, to construct containment walls, install coal tar extraction wells, and excavate or stabilize MGP-related contamination when parcels are accessible. National Grid has proposed to NYSDEC its approach related to their proposed remediation at the Head End Site parcels, including the parcels to be acquired for the Project.

The Owls Head Site is not located within a former MGP area, but has an industrial history (as do most of the properties along the Canal). The analysis will use existing data (both historical land uses and results of subsurface testing) on the Owls Head Site from the Superfund process and other readily available sources to determine the contamination that could be encountered during subsurface disturbance for the proposed CSO facility and other Project construction and identify the need for any additional site investigation.

The hazardous materials chapter of the DEIS will summarize the findings of existing historical land use studies and subsurface investigations already undertaken for the study area (i.e. the Head End Site and Owls Head Site, including staging areas) and will describe the procedures by which the soil and groundwater disturbance for the Project would be undertaken. The analysis will identify the need for additional site investigation (e.g., collection and laboratory analysis of soil, groundwater, or soil vapor samples) and procedures required to reduce the potential for significant adverse impacts due to hazardous materials, including procedures during construction to manage and dispose of excavated material and procedures to protect the health of local residents, Project construction workers, and future users of the Project sites.

## **WATER AND SEWER INFRASTRUCTURE**

A water and sewer infrastructure assessment analyzes whether a project may adversely affect the City's water distribution or sewer system and, if so, assesses the effects of such projects to determine whether their impact is significant and presents potential mitigation strategies and alternatives. According to the *CEQR Technical Manual*, only projects that increase density or change drainage conditions on a large site (generally five acres or larger) require a water and sewer infrastructure analysis. The Project would not result in development exceeding the *CEQR Technical Manual* thresholds requiring a detailed analysis, but would introduce two new CSO facilities that are intended to reduce the frequency of CSOs. Therefore, a description of the facilities and the potential effects to stormwater management, discharges of CSO solids,

and treatment capacity at the RH and OH WWTPs will be provided. The chapter will include a description of any infrastructure upgrades or system rerouting that is required as part of the Project, including upgrades to redirect flow to the facilities from nearby CSOs or construction of new regulators, outfalls, and/or pumping stations.

### **SOLID WASTE AND SANITATION SERVICES**

A solid waste assessment determines whether a project has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan or with state policy related to the City's integrated solid waste management system. According to the *CEQR Technical Manual*, a solid waste assessment is appropriate if a project generates 50 tons per week or more. The DEIS will include a preliminary screening assessment of the Project's potential to affect solid waste and sanitation services. If the Project would introduce facilities generating a large amount of solid waste a detailed assessment of solid waste and sanitation services will be provided.

### **ENERGY**

Analysis of energy focuses on a project's consumption of energy and, where relevant, potential effects on the transmission of energy that may result from the Project. According to the *CEQR Technical Manual*, a detailed assessment of energy impacts would be limited to actions that could significantly affect the transmission or generation of energy or that generate substantial indirect consumption of energy (such as a new roadway). Based on a preliminary assessment, the Project is expected to require an estimated 10.5 million British thermal units (BTUs) of energy annually. The DEIS will include a preliminary screening assessment of the Project's potential energy effects, including consultation with Con Edison, the local service provider, to confirm that the additional load and service connections can be accommodated.

### **TRANSPORTATION**

In accordance with criteria established in the *CEQR Technical Manual*, a quantified traffic and parking analysis is warranted if the Project would result in more than 50 vehicle-trips through any one intersection during a given peak hour. A quantified transit and pedestrians analysis is warranted if the Project would result in more than 200 transit or pedestrian trips during a given peak hour. Operation of the Project is not expected to exceed the 50 peak hour vehicle trips or 200 peak hour transit/pedestrian trip thresholds in the *CEQR Technical Manual*; therefore, a quantified assessment is not warranted. However, if permanent street closures are anticipated as part of the Project, an assessment of potential transportation impacts will be provided.

An assessment of potential transportation impacts related to the Project's construction will be provided in the construction analysis, described below.

### **AIR QUALITY**

Under CEQR, an air quality analysis determines whether a Project would result in stationary or mobile sources of pollutant emissions that could have a significant adverse impact on ambient air quality. The Project, once completed, would generate a negligible amount of emissions from mobile sources, such as cars and trucks; therefore, a mobile source analysis is not warranted. The air quality analysis will focus on emissions from stationary sources, including the ventilation of odors from the proposed facilities, exhaust emissions from the emergency generators, and any proposed heating, ventilating, and air conditioning (HVAC) equipment. The primary pollutant of concern for odors is hydrogen sulfide (H<sub>2</sub>S). The primary pollutants of concern for air quality from the emergency generators are carbon monoxide (CO), nitrogen

dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and from the HVAC systems are NO<sub>2</sub>, PM<sub>2.5</sub> and SO<sub>2</sub> depending on the type of fuel being utilized.

USEPA models and screening procedures outlined in the *CEQR Technical Manual* will be used to evaluate potential impacts associated with each facility's sources.

The analysis will include the following tasks:

- Existing ambient air quality data from representative NYSDEC monitoring stations will be summarized for the study areas;
- A stationary source screening level analysis for the HVAC systems will be performed to determine the potential for significant pollutant concentrations from on-site fossil fuel combustion. The screening analysis will use the procedures outlined in the *CEQR Technical Manual*, which involves determining the distance (from the exhaust point) within which potential significant impacts may occur, on ground level receptors (such as sidewalks) and elevated receptors (such as open windows, air intake vents, etc.) that are of an equal or greater height when compared with the height of each proposed facility's HVAC exhaust. The distance from which a significant impact may occur is dependent on a number of factors, including the height of the discharge type(s), fuel burned, and development size. If potential impacts are predicted by the screening level analysis, further analyses would be conducted using either the USEPA-approved AERSCREEN or AERMOD dispersion models;
- A dispersion modeling analysis of odors from both facilities will be performed. Receptor sites (i.e., places of public access where air quality exposure concentrations will be computed) will be selected based on locations where highest concentrations would be expected, receptors at the property periphery, and at selected receptors in the surrounding neighborhood. Odors will be assessed in terms of H<sub>2</sub>S since it is the most prevalent malodorous gas associated with domestic wastewater collection. H<sub>2</sub>S emissions will be calculated and determined using data from a representative WWTP. Potential H<sub>2</sub>S concentrations from each facility's odor control system will be compared to the City's *CEQR Technical Manual* screening level odor threshold of 1 parts per billion (ppb) for H<sub>2</sub>S at sensitive receptors. Modeled H<sub>2</sub>S concentrations will also be added to nearby sources and ambient background concentrations and compared to the New York State Ambient Air Quality Standard (NYSAAQS) of 10 ppb H<sub>2</sub>S in ambient air (i.e., at all off-site locations);
- Criteria pollutant emissions from the exercise and maintenance testing of each facility's emergency generator will be estimated and dispersion modeling analyses will be performed. Emissions of CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from the emergency generators will be modeled. Maximum pollutant concentrations at off-site receptor locations, including any appropriate ground-level and elevated receptors, would be estimated and compared with National Ambient Air Quality Standards (NAAQS) and other relevant criteria; and
- As necessary, measures to minimize any predicted significant adverse impacts from each facility's stationary source airborne emissions will be described and modeled.

An assessment of potential air quality impacts related to project construction will be provided in the construction analysis, described below.

## **CLIMATE CHANGE RESILIENCY AND GHG EMISSIONS**

In accordance with the *CEQR Technical Manual*, a greenhouse gas (GHG) emissions analysis discloses the GHG emissions that could result from a large-scale Project, and assesses the consistency of the Project with the City's goals to reduce GHG emissions. Therefore, this chapter of the DEIS will quantify Project-generated GHG emissions and assess the consistency of the Project with the City's established

GHG reduction goal. Emissions will be estimated for the analysis year and reported as carbon dioxide equivalent (CO<sub>2</sub>e) metric tons per year. GHG emissions other than carbon dioxide (CO<sub>2</sub>) will be included if they would account for a substantial portion of overall emissions, adjusted to account for the global warming potential. The construction phase or the extraction or production of materials or fuels needed to construct the Project is not likely to be a significant part of total Project emissions. Therefore, emissions resulting from construction activity and construction materials will be assessed qualitatively. Features of the Project that demonstrate consistency with the City's GHG reduction goal will be described.

As the Project sites are located in a flood hazard zone, the potential impacts of climate change on the Project will be evaluated. The discussion will focus on sea level rise and changes in storm frequency projected to result from global climate change and the potential future impact of those changes on Project infrastructure and uses.

## NOISE

The *CEQR Technical Manual* requires that the noise analysis address whether the Project would result in a significant increase in noise levels (particularly at sensitive land uses such as residences and open spaces).

~~As~~ If the Project ~~may potentially include~~ the use of noise-producing equipment located outdoors, ~~the~~ a noise analysis ~~will~~ would be performed focusing on the addition of unenclosed equipment. Specifically, the noise impact assessment for outdoor noise-producing equipment ~~will~~ would consist of the following subtasks:

- Select appropriate noise descriptors. Appropriate noise descriptors to describe the existing noise environment ~~will~~ would be selected. The Leq and L10 levels ~~will~~ would be the primary noise descriptors used for the analysis. Other noise descriptors including the L1, L10, L50, L90, Lmin, and Lmax levels ~~will~~ would be examined as appropriate;
- Select noise receptor locations. The receptor locations (i.e., residences, open spaces, churches, schools, etc.) ~~will~~ would be adjacent to proposed new equipment associated with the Project sites;
- Determine existing noise levels. Existing noise levels ~~will~~ would be measured adjacent to the Project site. These measurements ~~will~~ would include both 24-hour continuous noise level measurements and simultaneous 60-minute spot measurements and ~~will~~ would be conducted using Type I instrumentation. Recorded metrics ~~will~~ would include Leq, L1, L10, and L90;
- Based upon projected outdoor equipment specifications and the future site layouts, noise levels at locations on the Project site boundaries and at other nearby sensitive receptor locations ~~will~~ would be determined using computerized models and spreadsheets;
- An analysis ~~will~~ would be performed to determine whether the predicted noise levels for outdoor noise-producing equipment would comply with requirements of the New York City Noise Code, New York City Zoning Resolution Performance Standards for Manufacturing zones, DOB Mechanical Code and CEQR noise impact criteria; and
- If predicted noise levels are not in compliance with the above-mentioned criteria, measures that could be implemented to reduce noise levels and achieve compliance—e.g., shielding options (such as the use of sound barriers or berms), use of silencers or mufflers, use of quieter equipment, and placement of equipment—would be examined.

Noise associated with construction of the Project will be provided in the construction analysis below.



## **PUBLIC HEALTH**

According to the guidelines of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified in any one of these technical areas and the lead agency determines that a public health assessment is warranted, an analysis will be provided for that specific technical area.

## **NEIGHBORHOOD CHARACTER**

Neighborhood character is determined by a number of factors, including land use, socioeconomic conditions, open space, historic and cultural resources, urban design, visual resources, shadows, transportation, and noise. According to the guidelines of the *CEQR Technical Manual*, an assessment of neighborhood character is generally needed when a proposed project has the potential to result in significant adverse impacts in one of the technical areas presented above, or when a project may have moderate effects on several of the elements that define a neighborhood's character. Therefore, if warranted based on an evaluation of the Project's impacts, an assessment of neighborhood character would be prepared following the methodologies outlined in the *CEQR Technical Manual*. The analysis would begin with a preliminary assessment, which would involve identifying the defining features of the area that contribute to its character. If the preliminary assessment establishes that the Project would affect a contributing element of neighborhood character, a detailed assessment will be prepared to examine the potential neighborhood character-related effects of the Project through a comparison of future conditions both with and without the Project.

## **CONSTRUCTION IMPACTS**

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. The Project, because of its anticipated construction activities and duration as well as its proximity to sensitive receptor locations such as residences, may have the potential for construction impacts. Therefore, a construction assessment will be performed for potential construction-related impacts. This assessment will describe the construction schedule and logistics, discuss anticipated on-site activities, and provide estimates of construction workers and truck deliveries for the Project. In addition, the potential cumulative effects of project construction with the construction activities associated with other planned projects near the Project area will be discussed.

Technical areas to be assessed include the following:

- **Transportation Systems.** This assessment will consider construction logistics and construction vehicle trips from workers and deliveries in determining potential transportation-related impacts. A detailed construction traffic analysis will be conducted where potential detouring of existing traffic may be required. In accordance with the *CEQR Technical Manual*, a detailed traffic analysis will be performed for intersections expected to incur 50 or more incremental construction trips in passenger car equivalents (PCEs) to identify the potential for significant adverse traffic impacts. Data will be collected to establish the baseline traffic service levels for the early morning and late afternoon hours to capture the peak arrival and departure of construction worker and truck trips. The estimated peak-hour trips associated with the construction of the Project during peak construction will then be overlaid onto the traffic network in the Future Conditions in the Analysis Year and compared to the impact criteria outlined in the *CEQR Technical Manual* to determine the potential for significant adverse traffic impacts. Where potential impacts are identified, improvements would be explored to mitigate those impacts to the extent practicable.

The construction transportation section will also identify the number of parking spaces that may be needed during peak construction and discuss the potential Maintenance and Protection of Traffic (MPT) strategies that may be employed to reduce the effects of the construction of the Project on nearby transportation systems.

- **Air Quality.** Emissions from on-site construction equipment and on-road construction-related vehicles, as well as dust generating construction activities, have the potential to affect air quality. This assessment will include a quantitative air quality analysis of onsite construction activities using the USEPA NONROAD Emission Model and USEPA/American Meteorological Society (AMS) AERMOD dispersion model to determine the potential for air quality impacts on nearby sensitive receptor locations. Because the level of construction activities would vary from phase to phase, the approach to formulate the reasonable worst-case scenarios for analysis will be based on an estimated monthly construction work schedule, equipment employed, equipment emission rate, and usage factors. The periods of highest emissions nearest to sensitive receptor locations will be identified for modeling since they are expected to be the periods of greatest impacts. Other less intensive construction periods will either be modeled or presented as a qualitative discussion, based on the reasonable worst-case period results. In addition, if required, a mobile source analysis at representative intersection(s) will be conducted using the USEPA mobile source emissions model, MOVES, and dispersion model CAL3QHC/CAL3QHCR.
- **Noise and Vibration.** The construction noise impact section will include a detailed analysis of noise from construction of the Project. As part of the detailed construction noise analysis, noise receptors will be located at sensitive receptors (i.e., residences, open spaces, churches, schools, etc.) near the Project sites, including Project construction work areas and potential staging sites. Existing noise levels for both weekdays and weekend days at the selected receptors will be determined by noise measurements, including either 24-hour continuous noise level measurements or 60-minute spot measurements. The measurements will be conducted using Type I instrumentation. Recorded metrics will include Leq, L1, L10, and L90. The analysis will select representative worst-case time periods, and for each selected analysis period. Noise levels due to construction will be predicted at each sensitive receptor. If necessary based on the results of the construction noise analysis, the feasibility, practicability, and effectiveness of implementing measures to mitigate any significant construction noise impacts will be examined.

Construction activities have the potential to result in vibration levels that may result in structural or architectural damage, and/or annoyance or interference with vibration-sensitive activities. A construction vibration assessment will be performed. This assessment will determine critical distances at which various pieces of equipment may cause damage or annoyance to nearby buildings based on the type of equipment, the building construction, and applicable vibration level criteria. Should it be necessary for certain construction equipment to be located closer to a building than its critical distance, vibration mitigation options will be proposed.

- **Open Space.** Construction of the Project would have potential temporary effects on open space, particularly on the Canal and on Thomas Greene Playground. An assessment of the Project's temporary effects on or adjacent to any publically accessible open spaces, due to the construction of the Head End and Owls Head Sites will be provided.
- **Other Technical Areas.** As appropriate, other areas of environmental assessment for potential construction-related impacts will be discussed, including but not limited to historic and cultural resources, hazardous materials, natural resources, open space, socioeconomic conditions, community facilities, and land use and neighborhood character.

## **ENVIRONMENTAL JUSTICE**

The area near the Head End Site and the Owls Head Site is a potential Environmental Justice (EJ) area (i.e., an area that includes minority or low-income communities); therefore, the DEIS will include an Environmental Justice analysis that will address any potential adverse impacts on minority or low-income populations that could result from the Project. The analysis will be consistent with NYSDEC's Commissioner's Policy (CP)-29 Environmental Justice and Permitting and the intent of the New York City Council's recent EJ legislation (INT. 359 and INT. 886). The EJ analysis will establish the study area, identify potential adverse environmental impacts, and will determine whether potential adverse environmental impacts (as identified in the other chapters of the DEIS) are likely to affect a potential EJ area (i.e., a minority or low-income community). The chapter will also describe any measures to avoid or minimize potential significant adverse impacts, and will describe the Project's public participation program.

## **MITIGATION**

Where significant adverse project impacts have been identified for the Project, measures to mitigate those impacts will be identified and described. The mitigation chapter will address the anticipated impacts requiring mitigation, likely mitigation measures, and the timing of the mitigation measures. Where impacts cannot be practicably mitigated, they will be disclosed as unavoidable adverse impacts.

## **ALTERNATIVES**

The purpose of an alternatives analysis is to examine reasonable and feasible options that avoid or reduce project-related significant adverse impacts while still achieving the stated goals and objectives of the Project.

In most cases, a No Action Alternative (i.e., examining the impacts of not undertaking the action being reviewed) must be included in a DEIS. However, since the USEPA ROD requires the City to ~~reduce the volume of CSOs entering the Canal~~ construct two CSO Facilities, a No Action Alternative ~~(i.e., any alternative that does not reduce the volume of discharged CSOs) cannot be selected by the City. As such, the~~ No Action Alternative (i.e., not meeting the required CSO reductions) will not be evaluated as part of the DEIS.

The DEIS, though not considering a No Action Alternative, will include other alternatives analyses.

As discussed above, if the land at the Head End Property cannot be acquired within the allotted timeframe (per the Settlement Agreement), USEPA may direct that the Head End Facility be constructed at the Thomas Greene Playground, located to the east of the Head End Site across Nevins Street (Block 419, Lot 1). Therefore, the alternatives analysis for the Head End Site will include locating the facility on a portion of the Thomas Greene Playground. The analysis will include sufficient detail to allow comparison of environmental impacts and attainment of project goals and objectives with those of the Project.

As USEPA has not directed the City to site the Owls Head Facility at a particular location, the analysis will include a discussion of alternatives to the City's preferred location. In particular, this section would consider the alternative location to the east of the Owls Head Site along 6th Street (Block 979, Lots 18 and 23). This site was identified in a Siting and Planning Study performed by the City.

## **DEIS SUMMARY CHAPTERS**

In accordance with *CEQR Technical Manual* guidelines, the DEIS will include the following summary chapters, where appropriate to the Project:

- Executive Summary—will describe the Project and summarize its significant and adverse environmental impacts, measures to mitigate those impacts, and feasible alternatives to the Project;
- Unavoidable Adverse Impacts—will summarize any significant adverse impacts that are unavoidable if the Project is implemented regardless of the mitigation employed (or if mitigation is impossible);
- Growth-Inducing Aspects of the Project—will discuss the “secondary” impacts of a Project that trigger further development; and
- Irreversible and Irretrievable Commitments of Resources—will summarize the Project’s impacts in terms of the loss of environmental resources (i.e., use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long term. \*



## **Appendix A: Response to Comments on the Draft Scope of Work**

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### **A. INTRODUCTION**

This document summarizes and responds to all comments received during the public comment period for the Draft Scope of Work for the Gowanus Canal Combined Sewer Overflow (CSO) Facilities Project. The public hearing on the Draft Scope of Work was held on May 4, 2017, at P.S. 32, 317 Hoyt Street, Brooklyn, NY 11231. The comment period remained open until June 16, 2017.

Section B lists the organizations and individuals that provided comments relevant to the Draft Scope. Section C contains a summary of the comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the heading structure of the Draft Scope of Work. When more than one commenter expressed similar views, those comments have been grouped and addressed together. All written comments are included in Appendix B, “Written Comments Received on the Draft Scope of Work.”

### **B. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT SCOPE OF WORK**

#### **ELECTED OFFICIALS<sup>1</sup>**

1. Nydia Velasquez, Congresswoman, Congress of the United States House of Representatives, oral comments delivered May 4, 2017 (Velasquez\_N\_019)

#### **AGENCIES**

2. New York City Landmarks Preservation Commission, letter dated April 21, 2017 (LPC\_001)
3. Naim Rasheed, Senior Director, Traffic Engineering & Planning New York City Department of Transportation, email dated May 3, 2017 (DOT\_002)

#### **ORGANIZATIONS AND BUSINESSES**

4. Brooklyn Heights Association—Peter L. Bray, Executive Director, petition submitted on May 10, 2017 (Bray\_009)
5. Friends of Thomas Greene Park—Sue Wolfe, President, letters dated June 15, 2017 (FOTGP\_Wolfe\_031) and June 16, 2017 (Group\_034)
6. Gowanus Canal Conservancy—Andrea Parker, Executive Director, oral comments delivered May 4, 2017 (GCC\_Parker\_018), and letter dated June 16, 2017 (GCC\_032) (Group\_034)
7. Gowanus Dredgers Canoe Club—letter dated June 16, 2017 (GDCC\_033)
8. New York Lawyers for the Public Interest—Rachel Spector, Director of Environmental Justice, letter dated June 16, 2017 (Group\_034)

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<sup>1</sup> Citations in parentheses refer to internal comment tracking annotations.

## **Gowanus Canal CSO Facilities**

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9. Southwest Brooklyn Industrial Development Corporation—Mark Foggin, Interim Executive Director, letter dated June 16, 2017 (Group\_034)

### **GENERAL PUBLIC**

10. Sabine Aronowsky, oral comments delivered May 4, 2017 (Aronowsky\_013)
11. Karen Blondel, oral comments delivered May 4, 2017 (Blondel\_017)
12. Diane Buxbaum, oral comments delivered May 4, 2017 (Buxbaum\_016)
13. Jaclyn Calcagno, Esq., oral comments delivered May 4, 2017 (Calcagno\_015)
14. Paul Lozito, email dated May 16, 2017 (Lozito\_026)
15. Peter Reich, oral comments delivered May 4, 2017 (Reich\_020)
16. Brad Vogel, written comments (Vogel\_003) and oral comments (Vogel\_014) submitted May 4, 2017
17. Michael Higgins, Jr., Organizer, Families United for Racial and Economic Equality (FUREE), letter dated June 16, 2017 (Group\_034)
18. Michelle de la Uz, Executive Director, Fifth Avenue Committee, letter dated June 16, 2017 (Group\_034)
19. Linda Mariano, Co-Founder, Friends and Residents of Greater Gowanus, letter dated May 19, 2017 (FROGG\_Mariano\_028)

### **PETITIONS AND FORM LETTERS**

#### *ORGANIZATIONS*

20. Friends of Thomas Greene Park—petitions submitted on June 14, 2017 (FOTGP\_ChangeOrgPetition\_029) [98 signatories] and June 16, 2017 (FOTGP\_Petition\_030) [140 signatories]
21. Historic Districts Council—Kelly Carroll, Director of Advocacy & Community Outreach, petition submitted on May 9, 2017 (HDC\_Carroll\_004)

#### *GENERAL PUBLIC*

22. Lisa Ackerman, petition submitted on Sunday, May 14, 2017 (Ackerman\_023)
23. Matt Cline, petition submitted on May 9, 2017 (Cline\_005)
24. Matthew Coody, petition submitted May 15, 2017 (Coody\_024)
25. Sarah C. Davidson, petition submitted on May 12, 2017 (Davidson\_022)
26. Marlene Donnelly, petition submitted on May 9, 2017 (Donnelly\_008)
27. Katia Kelly, petition submitted on May 10, 2017 (Kelly\_006)
28. Jinny Khanduja, petition submitted on May 12, 2017 (Khanduja\_021)
29. Elizabeth Kurtulik, petition submitted on May 16, 2017 (Kurtulik\_025)
30. Linda Mariano, petition submitted on May 9, 2017 (Mariano\_007)
31. Deborah Newburg, petition submitted on May 11, 2017 (Newburg\_010)
32. Maggie Poxon, petition submitted on May 11, 2017 (Poxon\_011)
33. Peter Reich, petition submitted on May 11, 2017 (Reich\_012)

## **C. COMMENTS AND RESPONSES**

### **CEQR PROCESS**

- Comment 1:** Within one week before the Community Board public hearing, the project should float 20 balloons, at each location, at a height representing the approximate top of the bulkhead or other highest structure anticipated level for the project. The event should be announced,

should last for a minimum of four hours, and should have a scheduled “rain date” in the event of inclement weather. (GDCC\_033)

**Response:** As stated in the Draft Scope of Work, the Project will be reviewed in accordance with the New York State Environmental Quality Review Act (SEQRA), City Environmental Quality Review (CEQR), and the Uniform Land Use Review Procedure (ULURP). Both the CEQR and ULURP procedures provide for hearings at which the public may provide comments. Live demonstrations of the Project’s design or operation are not part of the CEQR or ULURP processes; however, in conformance with CEQR and ULURP requirements, public hearings on the Project will be held, and written comments on the Project will also be accepted during the specified comment periods. As noted in the Draft Scope of Work, the Environmental Impact Statement (EIS) will include a discussion of key Project elements at both the Head End and Owls Head Sites, including the above-grade structures to be constructed for each CSO facility, and other Project components, which will provide information on the Project’s built form.

**Comment 2:** The public comment period needs to be extended beyond ten days. (Velasquez\_N\_019)

**Response:** In response to public request and to allow for additional interested members of the public to comment on the Draft Scope of Work, the comment period for the Draft Scope of Work was extended beyond the initial end date of May 14, 2017, to June 16, 2017. The extended comment period has been noted in the Final Scope of Work.

**Comment 3:** There must be sufficient notice for when the Draft Environmental Impact Statement (DEIS) is prepared, including information regarding the public meeting. There needs to be much more extensive notification of various groups and a lot of headway in giving the public plenty of time to review the DEIS. In addition, the comment period should be extended, as we feel we must work within the confines of the community advisory group for the Gowanus Superfund site. (Buxbaum\_016)

**Response:** The DEIS will be made available for public review once it is completed; the public will be notified of availability of the DEIS in conformance with CEQR requirements; this will include publication of a notice of availability online and in a newspaper of record. The DEIS will be made available online and will also be distributed to key public stakeholders. As noted above, the comment period for the Draft Scope of Work was extended to June 16, 2017.

## **ANALYSIS FRAMEWORK**

**Comment 4:** I believe the proposed demolition of the two privately owned sites for the combined sewer overflow (CSO) retention tanks would have an adverse significant environmental impact on the Gowanus corridor. (FROGG\_Mariano\_028)

**Response:** As stated in the Draft Scope of Work, the EIS will evaluate the Project and identify the potential for the Project to result in significant adverse environmental impacts following the methodologies of the *City Environmental Quality Review (CEQR) Technical Manual*. DEP will, to the maximum extent practicable, avoid or mitigate potential significant

adverse environmental impacts, consistent with social, economic, and other essential considerations.

**Comment 5:** The project should include and forecast environmental impacts anticipated as a result of the planning actions expected to follow the Gowanus PLACES study. (GDCC\_033)

**Response:** As stated in the Draft Scope of Work, the EIS will assess the potential significant adverse impacts of the Project, which consists of the design and construction of the two CSO facilities, as mandated by the U.S. Environmental Protection Agency (USEPA) to satisfy USEPA-established remediation objectives under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund). The Gowanus PLACES study is a neighborhood planning study being conducted by the New York City Department of City Planning (DCP) and is independent of the Project and, as such, the study and any subsequent actions (such as a rezoning action) will be subject to independent environmental review. At this time, the Gowanus PLACES study has not generated sufficient information to determine whether there would be any potential cumulative significant adverse impacts in this DEIS. If such information becomes available in a timely manner, DEP will consider the potential for such impacts during the environmental review process.

**Comment 6:** One EIS should be prepared for analysis of both projects and should not be separated due to phasing. (GDCC\_033)

**Response:** As stated in the Draft Scope of Work, the EIS will evaluate both of the combined sewer overflow (CSO) facilities mandated by USEPA.

**Comment 7:** The population of these communities is extremely diverse in race, ethnicity, and income, and includes several New York City Housing Authority (NYCHA) developments (Gowanus Houses, Wyckoff Gardens, and Warren Street) as well as affordable housing. However, gentrification has steadily pushed out poor and non-white residents. Long-time residents already face pressure as the area becomes more lucrative to property developers, raising rents and threatening manufacturing and industry that has traditionally been an important source of employment for people that live here. The New York City Department of Environmental Protection (DEP) should analyze the project's impacts in this context and strive to raise, not diminish, the quality of life for residents in the area. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the EIS will assess the potential significant adverse impacts of the Project (see also responses to Comments 4 and 6). The EIS will include an analysis of the Project's potential effects on socioeconomic conditions, which will consider the potential for the Project to result in significant adverse impacts due to indirect residential or indirect business displacement (i.e., the potential for the Project to introduce a trend or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable residential population or introduce trends that make it difficult for certain businesses to remain in the area); see Socioeconomic Conditions in the Draft Scope of Work.



**Comment 8:** We urge DEP to coordinate closely with concurrent projects taking place around the Canal, particularly remediation of hazardous materials from former manufactured-gas plants, which we expect to be performed by National Grid, and rezoning of the area through the Gowanus Neighborhood Planning Study. Both projects have the potential to substantially change the neighborhood in which this project will take place, creating new land uses and construction challenges which should be incorporated in DEP's analysis. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the properties where the Head End Facility would be sited are located within National Grid's NYSDEC-directed Remedial Investigation study area. At this time, there is not sufficient information about National Grid's investigation and remedial action work to enable it to be considered in this review. In addition, see also the response to Comment 5 regarding the Gowanus PLACES study.

**Comment 9:** The EIS should also consider how noise, odor, and traffic impacts may compound existing or new impacts created by the rezoning and by other sewer-infrastructure projects already underway. (Group\_034)

**Response:** As stated in the Draft Scope of Work each impact analysis in the EIS (including the noise, air quality, and transportation analyses) will include a determination of the Future Conditions in the Analysis Year (or the Future without the Project) as the basis for assessing the Project's potential significant adverse impacts in the Future with the Project, following *CEQR Technical Manual* guidance. Any public policy actions or sewer infrastructure projects expected to be undertaken independently of the Project will be incorporated into the Future Conditions in the Analysis Year. See also response to Comment 5.

**Comment 10:** The analysis of environmental impacts in the EIS, particularly with respect to hazardous materials, traffic, air quality (including odors), noise, public health, and construction impacts, should also not be limited to some arbitrary radius but should consider all potential impacted populations and locations. DEP should pay particular attention to impacts on the entire Thomas Greene Park, the nearby NYCHA developments, the Whole Foods Market at 214 3rd Street, the parole office at 15 2nd Avenue, and local industrial businesses, as well as the impacts on workers at each of these sites.

DEP should perform a more stringent analysis for sensitive receptors in the area and provide extra mitigation measures as appropriate. For example, Thomas Greene Park is a particularly sensitive location because it is an open space that is frequented by young children, and the EIS should reflect that.

Analysis in the EIS should include impacts under normal operating conditions as well during any foreseeable maintenance actions and failure conditions. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the EIS analyses will follow the guidelines of the *CEQR Technical Manual*, which includes guidelines for determining the study area and analysis locations in each technical area. Specific to the air quality and noise analyses (both the operational and construction-related analyses), the EIS will consider the

Project's potential effects at sensitive land uses, which include residences and open spaces such as the nearby NYCHA properties, the Whole Foods Market open space, and the Thomas Greene Playground (see Air Quality, Noise, and Construction in the Draft Scope of Work). In addition, the study area for the Land Use, Zoning, and Public Policy analysis in the EIS has been extended from 400 feet to 600 feet to incorporate additional properties near the Head End Site and the Owls Head Site that may be affected by the Project, in particular the nearby NYCHA developments. If the analyses determine that the Project would result in any significant adverse impacts at these sensitive receptors, measures to mitigate those impacts will be identified and described in the EIS. The EIS will also include a discussion of the facilities' operation, including maintenance activities and operation during conditions when flows to the facilities exceed their capacity and a discussion of the measures that are expected to be incorporated into the design of the facilities to prevent potential impacts during maintenance activities or failure of mechanical systems.

**Comment 11:** To mitigate adverse impacts to the maximum extent practicable, DEP should coordinate its actions and construction timeline with National Grid's remediation efforts in the area. The community will lose its access to Thomas Greene Park in its current location during National Grid's removal of coal tar underneath the park. The construction phase of the Head End site will also unquestionably impact the community's ability to use and enjoy the park. Thus, DEP should coordinate with National Grid to minimize the time the community will be impacted by these actions. (Aronowsky\_013, Group\_034)

The EIS should consider the cumulative impacts of all the separate actions expected to occur in this area and their time frames to propose appropriate mitigation measures. (Group\_034)

It's difficult to make comments on just this EIS without understanding the National Grid remedy for the Manufactured Gas Plant (MGP) site. The clean-up efforts should be coordinated. (Aronowsky\_013)

**Response:** See response to Comment 8.

**Comment 12:** DEP should consider the area around Thomas Greene Park an environmental justice area and should be looked at pursuant to the new City local law regarding environmental justice. (Aronowsky\_013)

We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area. (FOTGP\_ChangeOrgPetition\_029)

**Response:** The Final Scope of Work has been revised to note that the area near the Head End Site and the Owls Head Site is a potential Environmental Justice (EJ) area; therefore, the EIS will include an Environmental Justice analysis that will address any potential adverse impacts on minority or low-income populations that could result from the Project. The EJ analysis will be consistent with NYSDEC's *Commissioner's Policy (CP)-29*

*Environmental Justice and Permitting* and the intent of the New York City Council's recent EJ legislation (INT. 359 and INT. 886).

## PROJECT DESCRIPTION

**Comment 13:** Please maintain canoe, kayak, and other watercraft access at the foot of 2nd Avenue. Please also account for any loss of watercraft docking space in 6th Street Turning Basin by calling for replacement access. (Vogel\_003, Vogel\_014)

Accommodations for temporary boat trailer parking evenings and weekends should be analyzed to be included in the lot or on 2nd Avenue. (GCC\_032)

The Project should analyze the impact of including a community dock, accessible at all times, and adequate lighting should be provided to illuminate the dock and not the water from dusk until dawn. The community dock should be Americans with Disabilities Act (ADA) complaint for access on and off the water. Due to space constraints, access on and off the dock (especially at low tide) should be analyzed to not comply with ADA via waiver approval but provide reasonable accommodations for the disabled.

The project's seawall should be analyzed to accommodate visiting vessel access, at low or no cost, when providing a community amenity such as the Waterfront Museum or Tugboat Pegasus. To achieve this, the handrails proposed along the bulkhead would be operable and have cleats / tie-up and utility connections among other needs. The North River Historic Ship Society should be consulted for details on specific accommodations. (GDCC\_033)

The Project should be analyzed to include low-cost or free community facility space for a community boathouse and educational center. (GDCC\_033)

**Response:** The Head End Site and Owls Head Site currently do not contain any public access to the Canal or docking areas. As noted by the commenter, a path through the deteriorated bulkhead at the end of 2nd Avenue adjacent to the Owls Head Site provides access to the water, although there is no formal dock or launch structure at this location. If construction of the Owls Head Facility would affect the use of this access point, it will be considered as part of the assessment of recreational use of the Canal in the in the Open Space chapter of the EIS. As stated in the Draft Scope of Work, the Project consists of the design and construction of the two CSO facilities, as mandated by the USEPA. The Project does not include public boating infrastructure such as docks or mooring facilities.

**Comment 14:** Should the City successfully build and locate the sewage holding tank at the Canal side site, there also exists the opportunity to expand Thomas Greene Park to the Canal's edge and address the need for more park space in Gowanus. (FOTGP\_ChangeOrgPetition\_029)

FOTGP is pleased to support the DEP recommended location for the Head End Facility that avoids placement of the DEP 8M gallon sewage and storm water retention tank facility within the current Thomas Greene Park boundaries and avoids taking an estimated one-third of the Park, which would constitute permanent alienation of park

space for the RH-034 sewage and storm water retention tank facility head house. FOTGP further supports this agreement because it also presents possible opportunities to increase our parkland in an already highly deficient area that serves low income populations and public housing residents that presently suffer disproportionately from the lack of access to open space. (FOTGP\_Wolfe\_031)

The DSOW indicates that the project will include redesign of the surface area of the sites and construction of two new above-grade structures (the head houses). Some of this area may be made available as public waterfront space.

We appreciate DEP incorporating open spaces and public waterfront access in the project design. The EIS should describe what this will include, and the EIS process should allow for community input on this design as well. (Group\_034)

It would be wonderful to see what's being planned for the open space above the tanks should they go between Nevins Street and the Canal; there needs to be community input on both the Canal access and how the open space is laid out. (Reich\_020)

The depth and impact of the northern tank location should be looked at so that the site can accommodate more green space and infrastructure. The design must consider the future use and the opportunity for additional green space. (Aronowsky\_013)

We ask that the agencies hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY. (FOTGP\_ChangeOrgPetition\_029)

**Response:** Comments noted. As stated in the Draft Scope of Work, with the construction of the above-grade structures of the two CSO facilities, the remainder of the Head End Site and the Owls Head Site are expected to be paved and accessible for maintenance with landscaping where appropriate. At the Head End Site, the Project would provide a 50-foot setback from the bulkhead wall along the Canal, and would provide some form of waterfront public access. Additional public space and/or public amenities on the Head End Site are also being considered, and will be determined through additional facility design in consultation with the local community and other City agencies. At the Owls Head Site, the site design will accommodate the existing DSNY facility on the site (as discussed in the Draft Scope of Work). The Owls Head Site is also expected to remain accessible for Gowanus Canal Conservancy (GCC); DEP is also evaluating the potential for the site to include accessible waterfront open space where it does not interfere or conflict with the operation of the Owls Head Facility. More information on GCC activities during operation of the Owls Head Facility and potential open space will be provided in the EIS.

**Comment 15:** We ask that all agencies involved coordinate their remediation efforts to guarantee continuity of Thomas Greene Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with

National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. (FOTGP\_ChangeOrgPetition\_029)

**Response:** As stated in the Draft Scope of Work, the Project would result in the construction of the Head End Facility at the Head End Site, adjacent to the Thomas Greene Playground, which is the location recommended in the Site Recommendation Report submitted by DEP to USEPA; USEPA accepted the recommendation and directed DEP to construct the facility there. Therefore, with the Project, the CSO facility would not be constructed in Thomas Greene Playground, although, under certain specified circumstances, USEPA retains the discretion to direct the City to construct the Head End Facility at the park as an alternate site. The EIS will analyze of the potential effects of the alternate location of the Head End Facility at the Thomas Greene Playground property, including potential park closures and park alienation, in the Alternatives analysis (see Alternatives in the Draft Scope of Work). With respect to the National Grid remediation activities in Thomas Greene Playground, see the response to Comment 8.

**Comment 16:** We also request the EIS scope to consider the full acquisition costs (vs leasing) for the Head End Site staging area to maximize the environmental and health opportunity to expand greenspace and to include in its scope the formation of a Community Environmental Justice Advisory Committee to aid in the participation and engagement of the public in regards to the facility siting and infrastructure. (FOTGP\_Wolfe\_031)

The staging area reverts back to private use after the lease is up, but it should instead be made into parkland. (Reich\_020)

**Response:** Reuse of the RH-034 Staging Area Property for public open space is not a part of the Project, which consists of the design and construction of the two CSO facilities, as mandated by the USEPA. As noted above in the response to Comment 14, at the Head End Site, the Project would provide a 50-foot setback from the bulkhead wall along the Canal, and would provide some form of waterfront public access. Additional public space and/or public amenities on the Head End Site are also being considered, and will be determined through additional facility design in consultation with the local community and other City agencies.

**Comment 17:** One of the Gowanus Canal Conservancy's (GCC's) core organizational objectives is to activate and empower community stewardship of the Gowanus Watershed to reduce CSO into the Canal. GCC annually engages over 2,000 volunteers, students and community members in open space stewardship, environmental education and design advocacy to advance this objective.

Since 2010, GCC has headquartered these stewardship and education activities at the Salt Lot, the selected site for the OH-007 CSO detention tank. As the lot is owned by the city, and adjacent to the OH-007 outfall, we fully support the siting of this critical infrastructure to reduce CSO into the Canal. However, we want to draw attention to



specific environmental impacts that this siting will have on these important stewardship and education activities, as well as the site improvements that have been made since 2010. We request that the EIS consider the following:

1. **Site Activity:** The site acts as a base for the activities below, which will be impacted by site investigation, construction and operation: organizing, materials and nursery hub for an annual 1,000 volunteers stewarding street trees, bioswales and gardens in the Gowanus Watershed, increasing permeability to decrease CSO; compost production site through a partnership with NYC Compost Project hosted by BIG Reuse, with an annual throughput of 400 tons of organic material. About 50 percent of the compost produced enriches tree pits and gardens in the Gowanus Watershed, increasing plant growth and water retention; education hub for an annual 1,000 local students and teachers to learn about environmental issues facing Gowanus and mitigation strategies; demonstration site for rainwater harvesting, engaging an annual 50 participants in rainwater harvesting workshops.
2. **Site Improvements:** Since 2010, GCC has cultivated the following ecosystem improvements on the site, which will be impacted and potentially destroyed by construction: the 2nd Avenue Street End Garden includes native plantings, retentive stone structures, seating and a boat launch, soaking up stormwater and providing a place for people to experience the Canal and the impacts of the OH-007 overflow; the Salt Lot Berm Garden includes native plantings, bird houses and a pedestrian path to experience the Canal; the Salt Lot Salt Marsh was planted in 2012, and is the only patch of *Spartina patens* and *alterniflora* on the Gowanus Canal, restoring the historic ecology of the Gowanus Creek and salt marsh.

The NYC Compost Project hosted by GCC and BIG Reuse includes \$500,000 of capital investment, including native plantings and stormwater retention across the site. (GCC\_032)

GCC currently uses the proposed Owls Head site for environmental education and stewardship. Development of the site will have a direct impact on this use, during construction and possibly afterward, depending on the extent of public space at the site. The EIS should discuss potential for mitigation by making alternative sites available for activities during construction and by including space of sufficient area for permanent environmental education and stewardship facilities, which can dovetail with interpretation of the CSO tank, at the Owls Head site. (Group\_034)

GCC has over the past ten years been building environmental education programs that are focused on the 007 CSO tank site. In addition to the compost facility, there are many community programs that go on there. This must be incorporated into the EIS and thought of in terms of future design. In addition to environmental education, there's a large native plant garden, a salt marsh, and some small design build projects that must also be incorporated into the EIS. Additionally, on the northern site there is a green street that NYC Parks put in about ten years ago, which GCC has been cleaning up (because NYC Park did not) and is about to replant it again. That must be considered and preserved as well. (GCC\_Parker\_018)

GCC has put plants near the Canal at 2nd Avenue, and those need to remain.  
(Vogel\_014)

**Response:** The educational activities and programming operated by GCC at the Owls Head Site have been noted in the Final Scope of Work and will be described in the EIS. As noted above in the response to Comment 14, the Owls Head Site is also expected to remain accessible for GCC; more information on GCC activities during operation of the Owls Head Facility will be provided in the EIS.

**Comment 18:** Evaluate options and costs for elimination of sewage discharge to the Gowanus Waterway.

Consider an option that would capture and treat or detain wastewater on both the Head End Site and the Owls Head site during storm events, therefore reducing the impact to Combined Sewer Overflows. If the Project needs to be modified to finance this option, the Project should be re-scoped. (GDCC\_033)

**Response:** As stated in the Draft Scope of Work, the Project includes the design and construction of two CSO facilities, as mandated by USEPA. The Head End Facility would reduce the CSO volume discharged from outfall RH-034 during a typical year by approximately 76 percent, and the Owls Head Facility would reduce the CSO volume discharged from outfall OH-007 during a typical year by approximately 85 percent. Improvements resulting from prior investments, including DEP's upgrade of the Flushing Tunnel and the Gowanus Wastewater Pumping Station, have resulted in significant improvements to water quality in the Canal, and existing Water Quality Standards are being met.

**Comment 19:** The scoping document should disclose LEED certification goals. Project goals should be LEED Platinum with a minimum acceptable LEED level for the Project to be LEED Gold. (GDCC\_033)

**Response:** The Project is being evaluated in relation to LEED energy efficiency goals as well as the Envision rating system (a voluntary system for benchmarking the performance and resiliency of infrastructure projects). The energy efficiency and sustainability measures that would be incorporated into the Project will be discussed in the EIS Greenhouse Gas Emissions chapter.

**Comment 20:** The Project should be evaluated to include alternative power generation capacity by using geothermal, wind, sun or canal current and water. (GDCC\_033)

**Response:** The Project consists of the construction of the two CSO facilities, which are expected to be in operation approximately 40 to 50 times of year and feature limited demand for energy (approximately 10.5 million British thermal units [BTUs] annually). Alternative power generation systems for the facilities, such as solar power, will be discussed in the EIS Greenhouse Gas Emissions chapter.

**Comment 21:** The scoping document does not disclose timeline for implementation of each site. (GDCC\_033)

**Response:** The Project's expected year of completion, as noted in the Draft Scope of Work, was 2026; based on additional Project planning, the expected year of completion has been updated to 2028 in the Final Scope of Work. Additional information on the Project's construction schedule and the implementation timeline for the Head End Facility and Owls Head Facility will be provided in the EIS (see Construction in the Draft Scope of Work).

**Comment 22:** The Project creates a nuisance and is a missed opportunity for enhancing the neighborhood. After hours, the Gowanus neighborhood streets currently serve as illegal dumping grounds and provide safe haven for prostitution, as well as drug use and sales. These problems will be exacerbated by walls of inactive evening and weekend uses at street level. (GDCC\_033)

**Response:** As noted above in the response to Comment 14, both the Head End Site and the Owls Head Site are expected to have paved areas with landscaping where appropriate in addition to the above-grade CSO facility structures. At the Head End Site, the Project would provide a 50-foot setback area from the bulkhead wall along the Canal and would provide some form of waterfront public access. Additional public space and/or public amenities at the Head End Site are also being considered, and will be determined through additional facility design in consultation with the local community and other City agencies. Furthermore, the EIS will address the potential environmental impacts of the Project, including potential significant adverse impacts related to operational nuisances such as air pollution and noise. DEP will, to the maximum extent practicable, avoid or mitigate potential significant adverse environmental impacts, consistent with social, economic, and other essential considerations.

**Comment 23:** The 50-foot esplanade amenity at the Head End Site should have active, programmed uses, protected from the weather to ensure a vibrant and active public space. A similar 50-foot amenity area should be provided along the shorelines of the Owls Head Site. (GDCC\_033)

**Response:** As noted in the Draft Scope of Work, at the Head End Site the Project would provide a 50-foot setback area from the bulkhead wall along the Canal and would provide some form of waterfront public access. Additional public space and/or public amenities on the Head End Site are also being considered, and will be determined through additional facility design in consultation with the local community and other City agencies. In addition, as noted above, the site design of the Owls Head Facility will accommodate the existing DSNY facility, and the site is expected to remain accessible for GCC; DEP is also evaluating the potential for the site to include accessible waterfront open space where it does not interfere or conflict with the operation of the Owls Head Facility. More information on GCC activities during operation of the Owls Head Facility and potential open space will be provided in the EIS.

**Comment 24:** The Project should consider increasing the number of parking spaces at the Owls Head Site to allow for public parking of private vehicles.

The Project should evaluate providing below-grade parking accommodations.  
(GDCC\_033)

**Response:** As stated in the Draft Scope of Work, the Project includes the construction of two CSO facilities, as mandated by USEPA. The Project does not include public parking at either the Head End Site or the Owls Head Site (the facilities are expected to be largely automated and would not require permanent staffing; any parking provided at the site would be limited to workers who would access the facilities to perform regular maintenance). In particular, below-grade parking structures would not be feasible, as the below grade space on each site is necessary to contain the CSO facilities' tanks.

**Comment 25:** The Project should restrict vehicle use to low or no emission vehicles and the analysis should include alternative fueling stations within any proposed parking on both sites.  
(GDCC\_033)

**Response:** The Project consists of the construction and operation of the CSO facilities, which will result in limited vehicle trips (as stated in the Draft Scope of Work, operation of the Project is not expected to exceed the 50 peak hour vehicle trips requiring a detailed traffic analysis; see "Transportation"). The use of alternative fuel vehicles on city streets is beyond the scope of this Project, as are the provision of parking and associated alternative fueling stations.

**Comment 26:** These new structures and layouts should employ imaginative, sustainable architectural and design strategies in line with the sustainability and livability goals of OneNYC, in particular Growth Goal 4 ("Thriving Neighborhoods"), Equity Goal 4 ("Healthy Neighborhoods, Active Living"), Sustainability Goal 6 ("Open Space & Natural Resources"), and Resiliency Goal 1 ("Neighborhoods" and its "Mitigate the Risks of Heat" initiative). The EIS should consider:

- Roof, outer-wall, and paving materials which could reduce urban heat island (UHI) effects, such as high-albedo coating;
- Maximization of vegetative cover through use of green roofing and vegetated walls in the head houses, and tree planting, grass, and planters in the remainder of the sites;
- Depth of cover for the CSO tanks at each site, and impact on surface-level uses (e.g., tree planting) within the tank footprint;
- Usability of any public space on either site, including availability of shade and rest points (e.g., benches); and
- Connection with other public spaces, including coordination with proposed public spaces created as part of the rezoning of the Canal area. (Group\_034)

**Response:** In addition to the ULURP process, the Project is being evaluated through a public design process, which includes review by the New York City Public Design Commission (PDC) as well as other City agencies and public stakeholders, which will guide the design and materials of the CSO facilities' above-grade structures. As noted above, both the Head End Site and the Owls Head Site are expected to have paved areas with landscaping where appropriate, in addition to the above-grade CSO facility structures. At the Head

End Site, the Project would provide a 50-foot setback area from the bulkhead wall along the Canal and would provide some form of waterfront public access. Additional public space and/or public amenities at the Head End Site are being considered, and will be determined through additional facility design in consultation with the local community and other City agencies. In addition, as noted above, the site design of the Owls Head Facility will accommodate the existing DSNY facility, and the site is expected to remain accessible for GCC; DEP is also evaluating the potential for the site to include accessible waterfront open space where it does not interfere or conflict with the operation of the Owls Head Facility.

**Comment 27:** In order to allow the community to better comment on the DEIS, it should include a detailed description of what the operation and maintenance of the site (including tank cleaning) requires, and any impacts particularly with regards to noise, odor, air quality, and traffic. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the EIS will include a detailed description of the proposed CSO facilities; this description will include a discussion of the facilities' operations. The EIS will include assessments of the Project's potential for significant adverse impacts from noise, odor, air quality, and traffic related to the facilities' construction and operation.

**Comment 28:** Superfund sites come with a training facility and training dollars. Residents must be offered an opportunity, especially since the build year is 2026, to be trained on the operational components (i.e., grit removal or analysis work). This will help local residents in this community so that they understand why this huge tank is there and understand the environmental issues facing the area.

If this project received U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) money, then Section 3 mandate must be met, which is a federal government mandate. (Blondel\_017)

**Response:** As noted in the Draft Scope of Work, the Project is part of the mandated Superfund remediation of the Canal; USEPA operates a Superfund Job Training Initiative (SuperJTI) that provides free training and employment opportunities for citizens living in communities affected by Superfund sites. The Superfund JTI program is operated by USEPA and is not part of the Project, which is being undertaken by DEP. In addition, the Project does not include any funding from the CDBG program; therefore, the requirement for training and employment opportunities under the Section 3 mandate (Section 3 of the Housing and Urban Development Act of 1968, as amended by the Housing and Community Development Act of 1992) is not applicable to the Project.

**Comment 29:** The Project should create a series of street-level and Canal-level perspectives so the community can better understand the scale of a new building at the water's edge and parking uses at street level. (GDCC\_033)



**Response:** The EIS will include a discussion of key Project elements at both the Head End and Owls Head Sites, including the above-grade structures to be constructed for each CSO facility, which will provide information on the Project's built form.

### **LAND USE, ZONING, AND PUBLIC POLICY**

**Comment 30:** A NYS or NYC Department of Probation Office has been proposed for the area; please include as a No-Action soft site. (DOT\_002)

**Response:** An office building that contains facilities for the New York State Department of Corrections (DOC) was recently constructed adjacent to the Owls Head Site across 2nd Avenue; this development will be described in the Land Use, Zoning, and Public Policy chapter of the EIS. As stated in the Draft Scope of Work, the Land Use, Zoning, and Public Policy chapter will also identify other future projects in the study areas that would be completed by the analysis year. This will include any known government facilities planned for the study area.

**Comment 31:** The Project proposes to evaluate a design to current flooding requirements but may have a capital life of 50 years. Design environmental analysis should reflect Base Flood Elevation projected for the capital life of the project to disclose potential impacts. (GDCC\_033)

**Response:** As stated in the Draft Scope of Work, an assessment of the Project's consistency with the Waterfront Revitalization Program (WRP) will be provided in the EIS. This will include an evaluation of the Project's consistency with WRP policies concerning flood resiliency and the effects of projected climate change and sea level rise on future flooding risk.

**Comment 32:** The EIS should take into account not just current conditions, but the expected new residential developments in the neighborhood, the associated population and density changes, and the interaction of the project's environmental impacts with those changes. In particular, the EIS should consider the expected rezoning of the Gowanus neighborhood, especially of the area immediately adjacent to the Canal. Because the current uses of the project sites are unlikely to be permitted to continue after rezoning, the appropriate baseline for analysis of the project's impact is the likely use after rezoning. This is especially true for the Head End site, which is outside the Gowanus Industrial Business Zone and therefore more likely to lose its M2 zoning status. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the Land Use, Zoning, and Public Policy chapter of the EIS will describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study areas. The analysis will account for any known zoning changes in the area near the Head End Site and the Owls Head Site in assessing the impacts of the Project on land use and land use trends, zoning, and public policy. See also the response to Comment 5.

**Comment 33:** DEP must carefully consider private property owners on both sides of Nevins Street near the Head End Site, and especially the deconstruction time that is allocated for this Project and how it will impact those owners. (Calcagno\_015)

**Response:** As stated in the Draft Scope of Work, the Land Use, Zoning, and Public Policy chapter of the EIS will consider existing uses in the study area, which includes existing uses on properties adjacent to the Head End Site and the Owls Head Site, and will assess the Project's compatibility with those surrounding land uses. In addition, the EIS will include an analysis of the Project's potential effects on surrounding properties during construction (see Construction in the Draft Scope of Work).

**Comment 34:** The study area for the land use, zoning, and public policy analysis should not be limited to a 400-foot radius. As the *CEQR Technical Manual* states, additional areas should be included if they will be impacted by the project or are clearly part of the neighborhood. There are several New York City Housing Authority (NYCHA) developments located near the project site, including the buildings on Bond Street between Douglass and Wyckoff Streets, the buildings on Nevins Street between Baltic and Wyckoff Streets, and the building at 572 Warren Street. There are also two affordable-housing properties owned by Fifth Avenue Committee which were impacted by Superstorm Sandy, at 190 Butler Street and 445 Baltic Street. The EIS should consider impacts on these buildings when appropriate. (Aronowsky\_013, Group\_034)

**Response:** The study area for the Land Use, Zoning, and Public Policy analysis in the EIS has been extended to 600 feet to incorporate additional properties near the Head End Site and the Owls Head Site that may be affected by the Project, in particular the nearby NYCHA developments. The 600-foot study area has been noted in the Final Scope of Work. Consistent with *CEQR Technical Manual* guidelines, the EIS will evaluate the potential of the Project to result in significant adverse impacts affecting nearby properties, including nearby residential buildings.

## **SOCIOECONOMIC CONDITIONS**

**Comment 35:** The analysis should consider that the project site is in a manufacturing zone (M2 district), and discuss the potential loss of jobs (and change in neighborhood character) from siting the tanks in these locations. (Group\_034)

**Response:** As noted in the Draft Scope of Work, the EIS Socioeconomic Conditions chapter will include a preliminary screening assessment that will identify the numbers and types of businesses, as well as employment associated with those businesses, that could be directly displaced by the Project. Based on *CEQR Technical Manual* guidelines, further analysis will be conducted if the potential displaced employment exceeds 100 workers, or if the Project would displace any business that is unusually important because its products or services are uniquely dependent on its location, it is subject to policies or plans aimed at its preservation, or because it serves a population uniquely dependent on its presence in its current location. Further analysis, if warranted, will consider the employment and business value characteristics of the potentially affected businesses to determine whether potentially displaced businesses provide products or services essential to the local economy that would no longer be available in their "trade areas" to local residents or businesses due to the difficulty of either relocating the businesses or establishing new, comparable businesses. The Socioeconomic Conditions chapter also

will consider the potential for indirect business displacement resulting from direct displacement of businesses and employees that might support other local businesses. The EIS will also include a Neighborhood Character analysis which will consider potential business displacement in assessing the Project's effects on neighborhood character.

**Comment 36:** Several potential impacts on local businesses are described throughout the Draft Scope of Work and these comments, including noise, odor, and traffic created by construction, operation, and maintenance. These impacts may be large enough to cause direct displacement of small businesses, and economic harm to large businesses and local industrial businesses, many of which employ a large number of neighborhood residents. Additionally, the presence of odor, noise, and traffic impacts may deter future industrial development in the area. The EIS should include the employment impacts of noise, odor, and traffic produced by construction, operation, and maintenance at the sites. (Group\_034)

**Response:** As discussed in the response to Comment 35, the EIS Socioeconomic Conditions chapter will consider the effects of potential direct and indirect business displacement resulting from the Project. As noted in the Draft Scope of Work, the EIS Construction chapter will assess the potential effects of construction noise, effects of construction on transportation systems, and the potential effects of construction activities on business conditions in the areas surrounding the Project Site.

#### *ENVIRONMENTAL JUSTICE COMMUNITIES*

**Comment 37:** DEP's mitigation measures should reflect that Gowanus is an environmental justice community and deserves special consideration. CEQR requires that DEP take all practicable steps to minimize the project's adverse environmental effects, consistent with social, economic, and other considerations. (Group\_034)

This should be considered an environmental justice area because of the proximity to public housing. (Aronowsky\_013)

**Response:** As noted above in the response to Comment 12, the EIS will include an Environmental Justice chapter that will address any potential adverse impacts on minority or low-income populations that could result from the Project. The addition of the Environmental Justice chapter has been noted in the Final Scope of Work.

#### **COMMUNITY FACILITIES AND SERVICES**

**Comment 38:** The Project should be analyzed to include community facility space at both locations. The Project should analyze and disclose the cost of providing accommodations for the growing youth population of the neighborhood should be considered, including day care as well as lower and middle school education. It is understood that to provide such amenity, the Project may need to be re-scoped at a higher density. (GDCC\_033)

**Response:** As noted above, the Project is limited the design and construction of two CSO facilities, as mandated by the USEPA; community facilities such as school or day care space are not being considered as part of the Project. As stated in the Draft Scope of Work, because

the Project would not introduce a new residential population, a detailed analysis of community facilities is not expected to be warranted, and an analysis of potential needs in the area for community facilities is beyond the scope of this CEQR analysis.

**OPEN SPACE**

**Comment 39:** Thomas Greene Park is the only green space, public park, and swimming pool that we currently have in Gowanus. (Aronowsky\_013, Blondel\_017)

The EIS should carefully consider how impacts from noise, odors, truck traffic, shadows, sightlines, etc. will impact people's ability to use and enjoy the only open space in the area. DEP should then propose mitigation measures to reduce adverse impacts to the greatest extent possible, which may require a temporary or permanent relocation of the park that will provide the same access to open, green space and pool. (Group\_034)

The EIS should include the effect of noise, air pollution, and increased traffic, particularly on 3rd Avenue, on sensitive receptors and on the availability of open space. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the EIS Open Space chapter will assess the Project's operational effects on nearby open spaces (e.g., potential increase in noise, air pollutants, and/or shadows). This will include an assessment of the Project's effects on Thomas Greene Playground, which is adjacent to the Head End Site. The Project's potential effects on Thomas Greene Playground and other nearby open spaces during construction will be assessed in the EIS Construction chapter. If the analyses identify any potential significant adverse impacts on adjacent open spaces, DEP will, to the maximum extent practicable, avoid or mitigate potential significant adverse environmental impacts, consistent with social, economic, and other essential considerations.

**Comment 40:** These comments together from our Friends of Thomas Greene Park group and the growing community of Park users and advocates, all ask for continued consideration for our communities needs for a healthy and safe public recreational environment and greenspace that minimize construction and operation impacts of the Head End CSO facility and provide for full interim and permanent park facilities and services. Seamless coordination between agencies must also be scoped to avoid worsening disproportionate availability of park space and/or permanent alienation of park space. (FOTGP\_Wolfe\_031)

**Response:** As noted above in the response to Comment 39, the EIS Open Space chapter will assess the Project's operational effects on nearby open spaces, including Thomas Greene Playground. As stated in the Draft Scope of Work, the Project's potential construction-related effects on nearby open space will be assessed in the EIS Construction chapter. As discussed in the response to Comment 15, the Head End Facility would not be constructed in Thomas Greene Playground, although, under certain specified circumstances, USEPA retains the discretion to direct the City to construct the Head End Facility at the park as an alternate site. As part of the Alternatives analysis, the EIS will evaluate the potential effects of the alternate location of the Head End Facility on the

Thomas Greene Playground, including potential park closures and alienation of parkland (see Alternatives in the Draft Scope of Work).

**Comment 41:** The open space analysis should include and evaluate improvements to the public launch site at the terminus of 2nd Avenue.

The Project should include analysis of the benefits of reconstruction of the existing launch site to accommodate launching and landing of powerboat vessels. (GDCC\_033, Vogel\_003, Vogel\_014)

**Response:** As noted above in the response to Comment 13, a path through the deteriorated bulkhead at the end of 2nd Avenue adjacent to the Owls Head Site provides access to the water, although there is no formal dock or launch structure at this location. Following *CEQR Technical Manual* guidance, the EIS Open Space chapter will assess the Project's direct effects on area open spaces resulting from operation of the facilities, and the EIS construction chapter will assess Project's potential construction-related effects on nearby open spaces. For the purposes of the analysis, the chapter will consider the Gowanus Canal as a recreational resource (i.e., a resource used by the surrounding community for recreational activities such as boating), and will assess the Project's potential effects on recreational use of the Canal, including any potential effects to access by recreational boaters; as noted above in the response to Comment 13, the assessment will consider the potential for construction of the Owls Head Facility to affect the use of the path at the end of 2nd Avenue as an access point. As stated in the Draft Scope of Work, the Project consists of the construction of the two CSO facilities as mandated by USEPA, and does not include any public boating infrastructure such as docks or mooring facilities

**Comment 42:** There should be an open space analysis of the study area looking at the potential impacts and the coordination efforts with National Grid. (Aronowsky\_013)

**Response:** See the response to Comment 8.

## HISTORIC AND CULTURAL RESOURCES

**Comment 43:** The Draft Scope of Work is acceptable for historic and cultural resources. (LPC\_001)

**Response:** Comment noted.

**Comment 44:** LPC review of archaeological sensitivity models and historic maps indicates that there is potential for the recovery of remains from 19th Century occupation including but not limited to bulkheads or land fill on the project site and industrial resources.

Accordingly, the Commission recommends that an archaeological documentary study be performed for this site to clarify these initial findings and provide the threshold for the next level of review, if such review is necessary (see the *2014 CEQR Technical Manual*). (LPC\_001)

**Response:** As stated in the Draft Scope of Work, the EIS will assess the archaeological sensitivity of the affected area, which includes the collection and analysis of documentary materials as



necessary. The archaeology analysis will be performed in consultation with the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) and the New York City Landmarks Preservation Commission (LPC), and will be provided to OPRHP and LPC for review and comment.

**Comment 45:** FROGG urges DEP to reconsider the use of eminent domain for these significant historical properties based on the negative cultural and historical impact this would create for the Gowanus Historic District. (FROGG\_Mariano\_028)

**Response:** As part of the planning and EIS process, DEP is considering alternatives to the demolition of historic properties on the Project site. This evaluation will be performed in consultation with OPRHP and LPC.

**Comment 46:** If the Draft Settlement is finalized by EPA after a public comment period, the City will need to perform an EIS. Although the Draft Settlement will allow the City to do demolition after acquiring the privately owned sites, prior to any demolition, the City, along with the State Office of Historic Preservation, must address, with proper protocol, the historic preservation impacts of their acquisition. The tank construction in these locations must be preceded by the protocol covered by Section 106 of the National Register of Historic Places, and the State Historic Preservation Act. aka Section 14.06, which includes an archaeology component. (FROGG\_Mariano\_028)

**Response:** Archaeological and historic resources assessments and analyses are being prepared pursuant to Section 106 of the NHPA and Section 14.09 of SHPA. The assessments and analyses will be prepared in consultation with OPRHP and LPC with the reports provided to OPRHP and LPC for review and comment.

**Comment 47:** Please ensure that Carroll Street Bridge CSO stays in place during High Capacity Sewer Main replacements on Carroll Street. This brick-faced, contributing historic element is located within the designated city landmark site, per the original landmark designation report. (Vogel\_003, Vogel\_014)

**Response:** The Project consists of the construction of the CSO facilities at the Head End Site and the Owls Head Site and does not include any improvements on Carroll Street or the Carroll Street Bridge. The project described by the commenter and the potential effects of that work on historic resources are outside the scope of this Project.

**Comment 48:** The EIS must look at whether there's any Belgium block under there, sort of the cobblestone streets that sometimes are hidden underneath the asphalt. (Vogel\_014)

**Response:** The historic resources assessment will evaluate whether there are any Belgian block pavers on the surface of city streets that would be affected during Project construction. If the assessment finds that the Project would result in the disturbance of Belgian block pavers, DEP, to the extent practicable and feasible, will salvage and reinstall usable pavers, or replace any unusable ones in kind.

*GOWANUS STATION BUILDING*

**Comment 49:** My chief concern is for the historic Gowanus Station building at the northeast corner of the “Head of Canal” CSO tank site. The structure, at the corner of Butler and Nevins, should be retained, as it contributes to the streetscape of the neighborhood and the ornamental sculptural work in the gable of the east façade, in particular, imparts an irreplaceable sense of place. The words “Gowanus Station” and their import convey an important aspect of Gowanus’ history. The outer walls of the structure, too, fit in with the neighborhood’s feel and should be retained as much as possible. Do not demolish the Gowanus Station structure as part of the CSO Tank work. (Vogel\_003, Vogel\_014)

The City of New York Water-Supply Distribution Gowanus Station building contributes physically to the historic character of the landmarked Gowanus neighborhood, and is a mile marker in the history of the New York City water supply.

Removal, modification, and/or demolition of the east-facing, facade would significantly and negatively impact the Gowanus community and the history of the wider community. (Lozito\_026)

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal. (Bray\_009, Cline\_005, Donnelly\_008, HDC\_Carroll\_004, Kelly\_006, Lozito\_026, Mariano\_007, Newburg\_010, Poxon\_011, Reich\_012)

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, should be saved in place as is, not demolished or taken down and possibly replaced on the site in some fashion later. (Ackerman\_023, Bray\_009, Cline\_005, Coody\_024, Davidson\_022, Donnelly\_008, HDC\_Carroll\_004, Kelly\_006, Kurtulik\_025, Mariano\_007, Khanduja\_021, Newburg\_010, Poxon\_011, Reich\_012)

**Response:** DEP, in consultation with OPRHP and LPC, will assess the feasibility of retaining all or portions of the Gowanus Station Building at 234 Butler Street. The results of the feasibility study and consultation with OPRHP and LPC will be included in the EIS.

**URBAN DESIGN AND VISUAL RESOURCES**

**Comment 50:** The EIS should consider the impact of the placement of the head houses at each site on urban design (especially sight lines to the Canal), walkability, and creation or maintenance of summer wind corridors that mitigate UHI effects. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the EIS will include a preliminary screening assessment of the Project’s potential to affect the urban design and visual resources of the study area, which includes publicly accessible views of the waterfront, following the guidelines of the *CEQR Technical Manual*. A detailed analysis will be prepared if warranted based on the preliminary assessment.

## NATURAL RESOURCES

**Comment 51:** The EAS indicates that the waterbody area will be determined. How will this information be presented in the EAS, including temporary/permanent disturbances and the volume of disturbance? When the information is available please have the consultant provide backup material for the determinations. (DOT\_002)

**Response:** The Project may include disturbance of waterbody area within the Canal (i.e., potential disturbance of the waterbody during improvements to bulkheads and/or outfalls). An assessment of the potential effects of this work will be provided in the EIS Natural Resources chapter as part of the analysis of the Project's effects on aquatic resources.

## WATER AND SEWER INFRASTRUCTURE

**Comment 52:** Because the proposed project will include construction of new structures and other redevelopment of the sites, the EIS should discuss the drainage implications of new structures and changes to permeability of the sites after development. (Group\_034)

**Response:** According to the *CEQR Technical Manual*, a detailed analysis of water and sewer infrastructure is warranted when a project would result in a change in drainage conditions on a large site (generally five acres or larger). As the Project would not result in a significant change in drainage conditions at the Head End Site or the Owls Head Site and construction of the CSO facilities would not result in a significant increase in impervious surface area on a large site, a detailed analysis is not warranted. However, as stated in the Draft Scope of Work, the EIS Water and Sewer Infrastructure chapter will include a description of the CSO facilities, including the facilities' potential effects to stormwater management.

## TRANSPORTATION

**Comment 53:** The Project should expand the Study area to include analysis of and potential need for restoration of the B71 MTA Bus and to ask the MTA to present to Community Board 6 after findings are published. (GDCC\_033)

**Response:** As per the *CEQR Technical Manual*, if the proposed project would result in fewer than 50 peak hour bus trips in one direction along a bus route, a detailed analysis of buses is not warranted and a project is not expected to result in any significant adverse bus line-haul impacts. The Project is anticipated to generate minimal peak hour bus trips during both the peak construction period and after the Project has been completed and therefore an analysis for the restoration of the B71 bus is not warranted.

**Comment 54:** Bike share and bicycle uses within 1/2 mile of each facility should be analyzed for relocation and better coordination with traffic needs of Gowanus. (GDCC\_033)

**Response:** The Project would have little or no effect on the area's bike share and bicycle uses. As part of the Project's construction, appropriate maintenance and protection of traffic plans would be prepared to address any temporary effects the construction may have on bike usage in the area.

## GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

**Comment 55:** The Project should be evaluated to have a net zero (or a net positive) energy footprint. (GDCC\_033)

**Response:** The EIS Greenhouse Gas Emissions chapter will evaluate the Project's anticipated energy consumption as well as the practicability of incorporating energy efficiency and renewable energy measures.

## NOISE

**Comment 56:** To the south of the proposed staging area for the primary head of the Canal tank location, there is a four-story building, which is full of artists-in-residence. It is exceedingly important that it go on the record that people live in that building, work in that building, and as the whole staging process is planned out in the next years, noise must be kept away from Sackett Street and that building. (Reich\_020)

**Response:** The operational noise analysis will consider the effect of noise generated by the Facilities on nearby sensitive receptors, including residential buildings such as the artist's residence building (282 Nevins Street), noted by the commenter.

The construction analysis will assess noise levels at several receptors in the vicinity of the proposed construction work areas, including the artists' residence (see Construction in the Draft Scope of Work). The analysis will determine the magnitude and duration of construction noise at this location resulting from Project construction based on an expected construction schedule, construction logistics diagrams, and a construction equipment list. If the noise level increases are determined to constitute a significant adverse impact, mitigation to the extent practicable and feasible will be described.

## CONSTRUCTION IMPACTS

**Comment 57:** Please ensure that the consultant provides a schedule for the 52-month construction schedule, identifying the highest quarter by year justifying the highest vehicles/workers/trucks as well as well as any occurring overlap supported by available background information. (DOT\_002)

**Response:** The EIS will provide the anticipated construction schedule and durations for the construction of the Project and identify the period(s) when the greatest number of truck trips and workers are anticipated. The background traffic volumes projected in the construction traffic analysis will include background growth and trips generated by discrete planned projects near the Project Sites

**Comment 58:** The Head End site (and its alternative) overlap with the Fulton Municipal MGP Site, where National Grid is expected to undertake remediation of hazardous materials. The EIS should therefore consider the effect of the remediation project on construction impacts and timeline under three alternative scenarios: remediation takes place prior to, after, or at the same time as tank construction. (Group\_034)

**Response:** See the response to Comment 8.

**Comment 59:** The EIS should consider the impact of construction at the Head End site on Thomas Greene Park, and at the Owls Head site on the nearby Whole Foods Market. The DSOW states that the EIS will consider the impacts of operation of the CSO tanks on open space, but not the impact of construction, which appears to be as large as or larger than that of operation. (Group\_034)

**Response:** The EIS Construction chapter will consider the effects of Project construction activities on nearby open spaces, including Thomas Greene Park, Whole Foods Market Open Space, and the Gowanus Canal.

**Comment 60:** People should not feel confined to their homes during the nine years of construction—this will lead to increases in obesity, diabetes, depression, mental illness. Quality of life in the community cannot be adversely affected by the construction. (Blondel\_017)

**Response:** The EIS will assess the Project’s construction-related activities and their potential temporary impacts on the adjacent community. As described in the Draft Scope of Work and consistent with *CEQR Technical Manual* methodology, if unmitigated significant adverse impacts are identified in technical areas such as air quality, water quality, hazardous materials, or noise, a public health analysis will be provided for that specific technical area.

## **MITIGATION**

**Comment 61:** When DEP weighs factors to choose appropriate mitigation measures, it should consider that federal, state, and city policies all promote the special consideration of environmental-justice communities. (Group\_034)

**Response:** As noted above in the response to Comment 12, the EIS will include an Environmental Justice chapter that will address any potential adverse impacts on minority or low-income populations that could result from the Project. Where significant adverse project impacts have been identified for the Project in the EIS, DEP will, to the maximum extent practicable, avoid or mitigate potentially significant adverse environmental impacts, consistent with social, economic, and other essential considerations.

**Comment 62:** Please make scholarships available for the residents to use indoor facilities while Thomas Greene Park is unavailable. (Blondel\_017)

**Response:** The EIS will include an assessment of the Project’s direct effects on open space, including direct effects on Thomas Greene Playground. If the analysis determines that the Project would result in a significant adverse impact on an open space resource, e.g., if the Project results in noise, air pollutant emissions, odors, or shadows on an open space that alter its usability, DEP will, to the maximum extent practicable, avoid or mitigate potentially significant adverse environmental impacts, consistent with social, economic, and other essential considerations.

## ALTERNATIVES

**Comment 63:** Friends of Thomas Greene Park (FOTGP) are concerned that the Federal order for the sewage tank siting still requires DEP to concurrently scope to alternatively site the northern sewage tank within Thomas Greene Park in the event that the City of NY is unable to acquire the land required for the sewage tank or meet the Federal prescribed timelines. In addition, the lower two-thirds of the Park closest to Nevins Street were also a part of a former MGP facility prior to becoming a capped Park, and as such publicly regulated gas utility company, National Grid, will also be required to excavate and capture an underground bed of coal tar waste that is slowly leeching into the Gowanus Canal. Currently there is no EPA order which lays out National Grid's remediation project scope and timeline, leaving Thomas Greene Park's future still unknown with limited understanding of the duration of disruption impacts and park closures. (FOTGP\_ChangeOrgPetition\_029)

The EIS should specify how much of the Park would be impacted or made permanently unavailable by the Head End facility if this alternative is selected. The EIS should also consider at least one alternative which maximizes post-project availability of the Park. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the Alternatives chapter will include analysis of the siting of the Head End Facility on the Thomas Greene Playground. With respect to National Grid, see the response to Comment 8. The Alternatives analysis will include consideration of the Park alternative's effects on open space, in particular potential closures of Thomas Greene Playground to allow for construction of the CSO facility, as well as in addition to potential closures that may occur independently of the Project due to the National Grid remediation work.

**Comment 64:** DEP should also consider the lack of open space when it conducts its analysis of the alternative siting of the Head End tank in the Park. Siting the tank in the Park will permanently diminish the community's scarce open space. Under this scenario, DEP's mitigation measures must include a permanent relocation or replacement of the Park. (Group\_034, Reich\_020)

**Response:** As noted above, the open space analysis of the siting of the Head End Facility on the Thomas Greene Playground will assess potential closures of the park. An analysis of the use of a portion of the park for a CSO facility will be described in the Alternatives chapter of the EIS.

**Comment 65:** The DSOW states that it will assess the effects on open space from operation of the facility, but does not discuss the impact of use of the Park site as an alternative. The EIS should specifically analyze the impact of use of the Park alternative on availability of open space, community character, and urban design. (Group\_034)

**Response:** As stated in the Draft Scope of Work, the analysis of the alternative location for the Head End Facility in the Thomas Greene Playground will be included in the EIS Alternatives chapters. Similar to the analysis of the Project, the alternative's analysis will include an



assessment of the potential effects on open space, urban design, and neighborhood character following the guidelines of the *CEQR Technical Manual*.

**Comment 66:** Siting the Head End facility in the Park will increase the distance between the CSO tanks and the RH-34 outfall, requiring additional subsurface infrastructure. This additional infrastructure could increase construction impacts, make O&M more difficult, and decrease the capacity and reliability of the CSO system. In considering use of the Park as an alternative site, the EIS should analyze the impact of the additional infrastructure. (Group\_034)

**Response:** As with the analysis of the Project, the Alternatives analysis will follow *CEQR Technical Manual* guidelines to evaluate potential significant adverse impacts. The evaluation of construction-related impacts resulting from additional activities that may be required to construct the conveyance system for the alternate CSO facility in the Thomas Greene Playground, as well as the impacts of the conveyance system to water and sewer infrastructure, will be included in the analysis.

**Comment 67:** Mitigation for use of the Park as an alternative site may include creation of a temporary park or pool elsewhere, potentially at the nearby Con Edison facility. The EIS should specify the location of the replacement park, its size, and the amenities which will be available, taking into consideration the effect of sharing the lot with other facilities, if relevant. To the extent that these differ from the Park, the EIS should identify any resulting impacts on, e.g., availability of open space, neighborhood character, and urban design. The EIS should analyze these impacts with reference to a timeline that includes extended unavailability of the Park due to remediation on former MGP sites performed by National Grid. (Group\_034)

**Response:** As noted above in the response to Comment 64, an analysis of the use of a portion of the Thomas Green Playground for a CSO facility will be described in the Alternatives chapter of the EIS. The alternatives analysis will identify any mitigation that is determined, to the extent practicable, to avoid or mitigate potential significant adverse environmental impacts, consistent with social, economic and other essential considerations. If available, the analysis will discuss any planned replacement park space that may be constructed as mitigation under this alternative.

**Comment 68:** In order to be sure that this important decision is as transparent as possible, the EIS should include an estimate of the cost to the City of each alternative. (Group\_034)

**Response:** The cost of alternative locations for the CSO facilities was evaluated as part of a siting and planning study, as discussed in the Draft Scope of Work, and is outside of the scope of the CEQR EIS.

**Comment 69:** If Thomas Greene Park is used as the tank location, it appears the entire park will be used as the tank facility. It would be really nasty to lose all those trees surrounding the park, which cannot be replaced. Consider instead putting the facility on the industrial wasteland by the Canal. (Reich\_020)

**Response:** As with the analysis of the Project, the Alternatives analysis will assess the potential effects on natural resources, include potential tree removal, following the guidance of the *CEQR Technical Manual*.

**Comment 70:** Alternative site selection options should be considered for each facility. Locating both facilities within the projected 100-year flood zone is poor planning and should be avoided. As condemnation is being considered, site selection should not be limited to City-Owned location and neighboring properties. (GDCC\_033)

**Response:** As stated in the Draft Scope of Work, a Siting and Planning Study was performed in order to identify the potential locations of the USEPA-mandated CSO facilities. The recommended locations for the Head End Facility and the Owls Head Facility were determined based on a variety of criteria. As the Siting and Planning study determined that the facility should be located near the Canal in close proximity to the affected CSO outfalls (RH-034 and OH-007) to limit the length of conveyance necessary to connect the facilities to the outfalls, it is necessary to site the Project within the 100-year flood zone. The Alternatives analysis will evaluate feasible alternative locations for both the Head End Facility and Owls Head Facility that were identified in the Siting and Planning Study.

**Comment 71:** The Project should analyze an alternative to any proposed reconstruction of bulkhead and seawalls to allow future use as a community dock. This area should be designed in concert with the Billion Oyster Project and the Gowanus Dredgers Canoe Club as continued water access and use of the public launch is essential for public health and safety—especially if an emergency landing is needed. (GDCC\_033)

**Response:** Following *CEQR Technical Manual* guidelines, the purpose of an Alternatives analysis is to examine reasonable and feasible options that avoid or reduce project-related significant adverse impacts while still achieving the stated goals and objectives of the Project. As noted above in the response to Comment 13, the Project does not include any public boating infrastructure such as docks or mooring facilities. Alternatives that would avoid or reduce any Project-related impacts will be evaluated in the EIS.

**Comment 72:** The Project should analyze an alternate development program with manufacturing retail, art gallery and community facility program as street level, specifically along the waterfront, 2nd Avenue, and Nevins and Douglass Streets frontage. These uses, occupied below the BFE, should encourage pedestrian patronage (not cars) and the maximum size of these spaces should be no less than 40,000 sf for each site and no use should exceed 15,000sf per development site. Unlike residential use, these uses are allowed within the flood level. (GDCC\_033)

**Response:** The Project consists of the design and construction of two CSO facilities, as mandated by the USEPA, and does not include any other uses. As noted above, alternatives that would avoid or reduce any Project-related impacts will be evaluated in the EIS following *CEQR Technical Manual* guidelines.

**Gowanus Canal CSO Facilities**

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**Comment 73:** The reduced square footage of open space should be considered if the Thomas Greene Park site is selected. (Aronowsky\_013)

**Response:** The analysis of the alternative location for the Head End Facility in the Thomas Greene Playground will include an assessment of the alternative’s direct effects on open space following *CEQR Technical Manual* guidance. This assessment will include the temporary or permanent loss of open space that may occur with the alternative.

**GENERAL COMMENTS IN SUPPORT OF THE PROJECT**

**Comment 74:** Good work is being done in getting these facilities built. (Velasquez\_N\_019)

**Response:** Comment noted.

**Comment 75:** We’ve come a long way in terms of trying to reduce the CSOs. (Velasquez\_N\_019)

**Response:** Comment noted.

**Comment 76:** We appreciate DEP incorporating open spaces and public waterfront access in the project design. (Group\_034)

**Response:** Comment noted.

**Comment 77:** As the lot is owned by the city, and adjacent to the OH-007 outfall, we fully support the siting of this critical infrastructure at the Owls Head Site to reduce CSO into the Canal. (GCC\_032)

**Response:** Comment noted.

\*

**APPENDIX B**  
**WRITTEN COMMENTS RECEIVED ON THE**  
**DRAFT SCOPE OF WORK**

To: Terrell Estes, Director  
Mitchell Wimbish, Project Manager  
NYC Department of Environmental Protection

From: Naim Rasheed, Senior Director  
Traffic Engineering & Planning

Re: Gowanus Combined Sewer Overflow (CSO) Facilities Project  
Draft Scope of Work, Draft Environmental Assessment Statement  
CEQR No.: 17DEP040K

Date May 3, 2017

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Please see DOT comments to the referenced materials below:  
DOT Draft comments to the DSOW and EAS

The EAS indicates that the waterbody area will be determined. How will this information be presented in the EAS, including temporary/permanent disturbances and the volume of disturbance? When the information is available please have the consultant provide backup material for the determinations.

A NYS or NYC Department of Probation Office has been proposed for the area, please include as a No-Action soft site.

Please ensure that the consultant provides a schedule for the 52-month construction schedule, identifying the highest quarter by year justifying the highest vehicles/workers/trucks as well as any occurring overlap supported by available background information.

Since this project is required and funded through the Federal Superfund, will this proposed action subscribe to an Estimated Time of Completion (ETC) for traffic analysis or will the proposed Build Year suffice?

If there are any questions I can be reached at 212-839-7710, or you may contact Marjorie Bryant at 212-839-7756.

## **ENVIRONMENTAL REVIEW**

**Project number:** DEPT. ENVIRONMENTAL PROTECTION / 17DEP040K  
**Project:** GOWANUS CANAL COMBINED SEWER OVERFLOW  
**Date received:** 4/7/2017

**Comments:** as indicated below. Properties that are individually LPC designated or in LPC historic districts require permits from the LPC Preservation department. Properties that are S/NR listed or S/NR eligible require consultation with SHPO if there are State or Federal permits or funding required as part of the action.

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The LPC is in receipt of the draft scope of work for EIS dated 3/31/17 and the EAS of 4/4/17. Both sites—Owl's Head and Head End—are within the S/NR eligible Gowanus Canal Historic District.

The DSOW is acceptable for historic and cultural resources.

Additionally, LPC review of archaeological sensitivity models and historic maps indicates that there is potential for the recovery of remains from 19th Century occupation including but not limited to bulkheads or land fill on the project site and industrial resources. See, Hunter Research, Inc. 2004 Draft Report, National Register of Historic Places Eligibility Evaluation and Cultural Resources Assessment for the Gowanus Canal, Brooklyn, NY; In Connection with the Proposed Ecosystem Restoration Study. Accordingly, the Commission recommends that an archaeological documentary study be performed for this site to clarify these initial findings and provide the threshold for the next level of review, if such review is necessary (see CEQR Technical Manual 2014).

**Cc: SHPO**  
**MOEC**



4/21/2017

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SIGNATURE  
Gina Santucci, Environmental Review Coordinator

DATE

**File Name:** 32292\_FSO\_DNP\_04122017.doc

**From:** Peter Bray [<mailto:pbray@thebha.org>]

**Sent:** Wednesday, May 10, 2017 9:56 AM

**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>

**Subject:** Gowanus Station

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, should be saved in place as is. Its facades should not be demolished or altered in any way. The building merits being designated as a NYC individual landmark.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Name: Peter L. Bray

Address: 237 Garfield Place, Brooklyn, NY 11215

--

Peter L. Bray, Executive Director

Brooklyn Heights Association

55 Pierrepont Street, 17D

Brooklyn, NY 11201

(718) 858-9193



**From:** Sabine Aronowsky [mailto:[sabine13@gmail.com](mailto:sabine13@gmail.com)]

**Sent:** Friday, June 16, 2017 9:28 AM

**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>

**Cc:** Sue Wolfe <[Sue.Wolfe@corcoran.com](mailto:Sue.Wolfe@corcoran.com)>

**Subject:** FOTGP Draft EIS Scoping Comments Letter and Petitions to DEP CEQR # 17DEPP040K

Rasheed Lucas, Project Manager

Bureau of Environmental Planning and Analysis, New York City Department of Environmental Protection 59-17 Junction Blvd, 11<sup>th</sup> Floor Flushing, NY 11373-5108

[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)

CEQR # 17DEPP040K

June 16, 2017

Dear Mr. Lucas,

Attached are the Friends of Thomas Greene Park (FOTGP) comments on the CSO Facilities Project Environmental Impact Statement for CEQR No. 17DEPP040K regarding the Head End facility to be constructed by DEP in regards to the EPA Superfund cleanup of the Gowanus Canal. Also included are petitions that concerned citizens of Brooklyn have signed to "Save Thomas Greene Park", and the signatures of students of P.S. 88 who made their sustainability presentations about Thomas Greene Park and the Gowanus Canal overflow for the EXPO Gowanus on May 20th in the park and at a recent C.A.G. Meeting.

Please note the community of Gowanus and the surrounding communities of Park Slope, Boerum Hill, Carroll Gardens, etc. care about this park as a green space and the DD Pool. Please confirm receipt of our attached comments and petition.

Sincerely,

Sue Wolfe, President

FOTGP



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CEQR # 17DEPP040K

June 15, 2017

Dear Mr. Lucas,

Friends of Thomas Greene Park (FOTGP) would like to thank the DEP for its efforts and dedication over the past few years to comply with the EPA Superfund Orders in regards to siting Gowanus Canal CSO Facilities in support of the cleanup of the Gowanus Canal. We thank DEP for considering and recognizing the important community resource that Thomas Greene Park and the Douglass and Degraw (Double D) public swimming pool represent, while also addressing the need to manage the Combined Sewer Overflow problems facing our neighborhood.

The Friends of Thomas Greene Park, Inc. (FOTGP) is a 501(c)(3) organization that works with community and business partners to enhance the quality of life in the Thomas Greene Park area through programming and special activities for all ages, and works with the NYC Parks Department to assure stewardship over and advocate for much needed green and public space in Gowanus, Brooklyn. FOTGP is an organizational member of the EPA Gowanus Canal Superfund Community Advisory Group (CAG) and we have limited the breadth of our comments on the Draft Scope for the Gowanus Canal CSO Facilities to the Head End Site addressing the RH-034 sewage tank draft scoping, with our aim to advocate for minimizing the impacts and maximizing the opportunities for the Thomas Greene Park and the community of users that rely on this public park space and the services provided.

FOTGP is pleased to support the DEP recommended location for the Head End Facility that avoids placement of the DEP 8M gallon sewage and storm water retention tank facility within the current Thomas Greene Park boundaries and avoids taking an estimated 1/3 of the Park which would constitute permanent alienation of park space for the RH-034 sewage and storm water retention tank facility head house. FOTGP further supports this agreement because it also presents possible opportunities to increase our parkland in an already highly deficient area that serves low income populations and public housing residents that presently suffer disproportionately from the lack of access to open space.

FOTGP remains concerned that the Federal order still requires DEP to concurrently scope to alternatively site the RH-034 CSO retention tank within Thomas Greene Park in the event that the City of NY is unable to acquire the land required for the tank or meet the Federal prescribed timelines. In addition, the lower two-thirds of the Park closest to Nevins Street were also a part of a former Manufactured Gas Plant (MGP) facility prior to becoming a capped Park, and as such publicly regulated gas utility company, National Grid, will also be required to excavate and capture an underground bed of coal tar that is slowly leeching into the Gowanus Canal. Currently there is no EPA order which lays out National Grid's remediation project scope and timeline, leaving Thomas Greene Park's future still unknown with limited understanding of the duration of disruption impacts and park closures. At this time the Park closure is roughly estimated to be anywhere from 4 to 12 years or more depending on the sequencing of remediation work and the site selection of the Head End sewage tank. The agencies involved have thus far only verbally committed to providing temporary and permanent replacement Park facilities and have said that



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ultimately the responsibility for financing the Park reconstruction and temporary park facilities will be National Grid's. Should the City of NY successfully build and locate the sewage holding tank at the Canal side Head End site there also exists the opportunity to expand Thomas Greene Park to the Canal's edge and address the need for more park space in Gowanus.

For all these concerns we ask that DEP and all agencies involved scope their Environmental Impact Statements (EIS) to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge DEP to include clear timelines in their EIS scope to calculate the length of disruption and closure of Thomas Greene Park based on each Head End Site location and we ask DEP to include acquisition and construction costs for a temporary park and park reconstruction for its concurrent scope to site the CSO holding tank and head house within Thomas Greene Park. We ask that the DEP analyze in its EIS the retention tank construction and operation in the context of relevant federal, state, and city orders, policies and legislation, which consider relevant environmental justice orders, policies and legislation in public decision-making such as Executive Order 12898 and NYSDEC's Commissioner Policy 29, and NYC Intro 0359A and Intro 0886A. We also request the EIS scope to consider the full acquisition costs (vs leasing) the Head End Site staging to maximize the environmental and health opportunity to expand greenspace and to include in its scope the formation of a Community Environmental Justice Advisory Committee to aid in the participation and engagement of the public in regards to the facility siting and infrastructure.

For all these reasons and more FOTGP continues to petition all the agencies involved in determining the future of our Park to ensure our communities concerns to provide for equity, environmental justice and public health that protect and grow Thomas Greene Park during the Superfund clean-up of the Gowanus Canal are registered.

As part of this scoping comment letter FOTGP is submitting close to 100 new online petition signatures (<https://www.change.org/p/protect-and-grow-thomas-greene-park-in-the-superfund-clean-up-of-the-gowanus-canal>) and over 140 paper petition signatures gathered in the last few weeks to support our comments. And we are also submitting via this letter our previous (now closed) online petition from over 3 years ago (<https://www.change.org/p/epa-make-the-polluters-pay-not-our-community-save-the-double-d-pool>) with 1,195 signatures requesting that the RH-034 CSO retention tank not be sited in Thomas Greene Park. These comments together from our FOTGP group and the growing community of Park users and advocates, all ask for continued consideration for our communities needs for a healthy and safe public recreational environment and greenspace that minimize construction and operation impacts of the Head End CSO facility and provide for full interim and permanent park facilities and services. Seamless coordination between agencies must also be scoped to avoid worsening disproportionate availability of park space and/or permanent alienation of park space.

Thank you for all your time and attention to these matters.

Sincerely,

Sue Wolfe,  
President, Friends of Thomas Greene Park

Sabine Aronowsky,  
Friends of Thomas Greene Park Board  
Member and Organizational  
Representative, Friends of Thomas Greene  
Park, EPA Region 2 Gowanus Canal  
Superfund Community Advisory Group



June 16, 2017

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Sent via e-mail to: Rasheed Lucas, [RLucas@dep.ny.gov](mailto:RLucas@dep.ny.gov)

**Comments on Draft Scope of Work for the Gowanus Canal CSO Facilities  
CEQR NO. 17DEP040K**

**from Fifth Avenue Committee, Friends of Thomas Greene Park, Families United for Racial and Economic Equality (FUREE), Gowanus Canal Conservancy, Southwest Brooklyn Industrial Development Corporation, and New York Lawyers for the Public Interest**

Dear Mr. Lucas:

We thank the New York City Department of Environmental Protection (“DEP”) for this opportunity to submit comments on the Draft Scope of Work for the Gowanus Canal CSO facilities project. We are a group of organizations representing and supporting the communities surrounding the Gowanus Canal who have concerns about the project’s impact on the area.

The population of these communities is extremely diverse in race, ethnicity, and income, and includes several New York City Housing Authority (“NYCHA”) developments (Gowanus Houses, Wyckoff Gardens, and Warren Street) as well as affordable housing. However, gentrification has steadily pushed out poor and non-white residents. Long-time residents already face pressure as the area becomes more lucrative to property developers, raising rents and threatening manufacturing and industry that has traditionally been an important source of employment for people that live here. DEP should analyze the project’s impacts in this context and strive to raise, not diminish, the quality of life for residents in the area.

In addition, we urge DEP to coordinate closely with concurrent projects taking place around the Canal, particularly remediation of hazardous materials from former manufactured-gas plants, which we expect to be performed by National Grid, and rezoning of the area through the

Gowanus Neighborhood Planning Study. Both projects have the potential to substantially change the neighborhood in which this project will take place, creating new land uses and construction challenges which should be incorporated in DEP's analysis.

## **I. Land Use, Zoning, and Public Policy**

### *a. Study Area*

The study area for the land use, zoning, and public policy analysis should not be limited to a 400-foot radius. As the CEQR Technical Manual states, additional areas should be included if they will be impacted by the project or are clearly part of the neighborhood. There are several NYCHA developments located near the project site, including the buildings on Bond St. between Douglass St. and Wyckoff St., the buildings on Nevins St. between Baltic St. and Wyckoff St., and the building at 572 Warren St. There are also two affordable-housing properties owned by Fifth Avenue Committee which were impacted by Superstorm Sandy, at 190 Butler St. and 445 Baltic St. The EIS should consider impacts on these buildings when appropriate.

### *b. Analysis in Context of Neighborhood Changes*

The analysis should consider that the project site is in a manufacturing zone (M2-district), and discuss the potential loss of jobs (and change in neighborhood character) from siting the tanks in these locations.

The EIS should take into account not just current conditions, but the expected new residential developments in the neighborhood, the associated population and density changes, and the interaction of the project's environmental impacts with those changes. In particular, the EIS should consider the expected rezoning of the Gowanus neighborhood, especially of the area immediately adjacent to the Canal. Because the current uses of the project sites are unlikely to be permitted to continue after rezoning, the appropriate baseline for analysis of the project's impact is the likely use after rezoning. This is especially true for the Head End site, which is outside the Gowanus Industrial Business Zone and therefore more likely to lose its M2 zoning status.

### *c. Compatibility with OneNYC*

The DSOW indicates that the project will include redesign of the surface area of the sites and construction of two new above-grade structures (the head houses). Some of this area may be made available as public waterfront space. These new structures and layouts should employ imaginative, sustainable architectural and design strategies in line with the sustainability and livability goals of OneNYC, in particular Growth Goal 4 ("Thriving Neighborhoods"), Equity Goal 4 ("Healthy Neighborhoods, Active Living"), Sustainability Goal 6 ("Open Space & Natural Resources"), and Resiliency Goal 1 ("Neighborhoods" and its "Mitigate the Risks of Heat" initiative). The EIS should consider:

- Roof, outer-wall, and paving materials which could reduce UHI effects, such as high-albedo coating;

- Maximization of vegetative cover through use of green roofing and vegetated walls in the head houses, and tree planting, grass, and planters in the remainder of the sites;
- Impact of the placement of the head houses at each site on urban design (especially sight lines to the Canal), walkability, and creation or maintenance of summer wind corridors that mitigate UHI effects;
- Depth of cover for the CSO tanks at each site, and impact on surface-level uses (e.g., tree planting) within the tank footprint;
- Usability of any public space on either site, including availability of shade and rest points (e.g., benches); and
- Connection with other public spaces, including coordination with proposed public spaces created as part of the rezoning of the Canal area.

*d. Current Use of Owls Head Site*

The Gowanus Canal Conservancy currently uses the proposed Owls Head site for environmental education and stewardship. Development of the site will have a direct impact on this use, during construction and possibly afterward, depending on the extent of public space at the site. The EIS should discuss potential for mitigation by making alternative sites available for activities during construction and by including space of sufficient area for permanent environmental education and stewardship facilities, that can dovetail with interpretation of the CSO tank, at the Owls Head site.

## **II. Socioeconomic Conditions**

Several potential impacts on local businesses are described throughout the DSOW and these comments, including noise, odor, and traffic created by construction, operation, and maintenance. These impacts may be large enough to cause direct displacement of small businesses, and economic harm to large businesses and local industrial businesses, many of which employ a large number of neighborhood residents. Additionally, the presence of odor, noise, and traffic impacts may deter future industrial development in the area. The EIS should include the employment impacts of noise, odor, and traffic produced by construction, operation, and maintenance at the sites. The EIS should also consider how these impacts may compound existing or new impacts created by rezoning and by other sewer-infrastructure projects already underway.

## **III. Water and Sewer Infrastructure**

The DSOW indicates that the EIS will discuss the effect on stormwater management of the proposed CSO tank installation, but does not state that the drainage from the sites will be included in this analysis. Because the proposed project will include construction of new structures and other redevelopment of the sites, the EIS should discuss the drainage implications of new structures and changes to permeability of the sites after development. This will allow for a full understanding of the net impact of the sites.

#### **IV. Sensitive Receptors and Locations**

The analysis of environmental impacts in the EIS, particularly with respect to hazardous materials, traffic, air quality (including odors), noise, public health, and construction impacts, should also not be limited to some arbitrary radius but should consider all potential impacted populations and locations. DEP should pay particular attention to impacts on the entire Thomas Greene Park (“the Park”), the nearby NYCHA developments, the Whole Foods Market at 214 3rd St., the parole office at 15 2nd Ave., and local industrial businesses, as well as the impacts on workers at each of these sites.

DEP should perform a more stringent analysis for sensitive receptors in the area and provide extra mitigation measures as appropriate. For example, Thomas Greene Park is a particularly sensitive location because it is an open space that is frequented by young children, and the EIS should reflect that.

The impact on sensitive receptors may vary depending on the condition of the CSO tanks and, when maintenance is performed, the type and extent of maintenance. Analysis in the EIS should include impacts under normal operating conditions as well during any foreseeable maintenance actions and failure conditions.

#### **V. Construction**

As noted in the DSOW, the Head End site (and its alternative) overlap with the Fulton Municipal MGP Site, where National Grid is expected to undertake remediation of hazardous materials. Unlike the proposed project, neither EPA nor DEC have required a timetable for the National Grid remediation. The EIS should therefore consider the effect of the remediation project on construction impacts and timeline under three alternative scenarios: remediation takes place prior to, after, or at the same time as tank construction.

The EIS should consider the impact of construction at the Head End site on Thomas Greene Park, and at the Owls Head site on the nearby Whole Foods Market. The DSOW states that the EIS will consider the impacts of operation of the CSO tanks on open space, but not the impact of construction, which appears to be as large or larger than that of operation. The EIS should include the effect of noise, air pollution, and increased traffic, particularly on 3rd Avenue, on sensitive receptors and on the availability of open space.

#### **VI. Mitigation**

##### *a. Consideration of Environmental Justice*

DEP’s mitigation measures should reflect that Gowanus is an environmental-justice community and deserves special consideration. CEQR requires that DEP take all practicable steps to minimize the project’s adverse environmental effects, consistent with social, economic, and other considerations. When DEP weighs these factors to choose appropriate mitigation measures, it should consider that federal, state, and city policies all promote the special consideration of environmental-justice communities.



This project is sited in and affects an area with significant minority and low-income populations. DEC has highlighted areas in and around this neighborhood as containing potential environmental justice areas.<sup>1</sup> In its coordination with EPA and DEC, DEP must abide by Executive Order 12898 and NYSDEC's Commissioner Policy 29, which govern these agencies' actions. Additionally, the city recently passed its own environmental justice bills, Intro 359A and Intro 886A, which promote the consideration of environmental justice issues in city agency decision-making. Thus, DEP must take greater measures to mitigate environmental impacts in this community than it would otherwise.

*b. Consideration of Historical Lack of Open Space in the Area*

When proposing mitigation measures, DEP must also recognize the historical scarcity of open space in this area relative to the city as a whole. The CEQR Technical Manual designates as "underserved areas" areas "where the amount of open space per 1000 residents is currently less than 2.5 acres."<sup>2</sup> Areas of Gowanus close to the project are considered an underserved area.<sup>3</sup> Residents rely on Thomas Greene Playground and the Douglas and DeGraw Pool as the only open, green space in the immediate area.

This should be considered in the analysis of impacts on the park from construction, operation, and maintenance of the tank. The EIS should carefully consider how impacts from noise, odors, truck traffic, shadows, sightlines, etc. will impact people's ability to use and enjoy the only open space in the area. DEP should then propose mitigation measures to reduce adverse impacts to the greatest extent possible, which may require a temporary or permanent relocation of the park that will provide the same access to open, green space and pool.

DEP should also consider the lack of open space when it conducts its analysis of the alternative siting of the Head End tank in the Park. Siting the tank in the Park will permanently diminish the community's scarce open space. Under this scenario, DEP's mitigation measures must include a permanent relocation or replacement of the Park.

Finally, we appreciate DEP incorporating open spaces and public waterfront access in the project design. The EIS should describe what this will include and the EIS process should allow for community input on this design as well.

*c. Coordination with Other Actions*

To mitigate adverse impacts to the maximum extent practicable, DEP should coordinate its actions and construction timeline with National Grid's remediation efforts in the area. The community will lose its access to Thomas Greene Park in its current location during National Grid's removal of coal tar underneath the park. The construction phase of the Head End site will

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<sup>1</sup> See DEC, MAP SHOWING POTENTIAL ENVIRONMENTAL JUSTICE AREAS IN KINGS COUNTY, New York, [http://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/kingsejdetail.pdf](http://www.dec.ny.gov/docs/permits_ej_operations_pdf/kingsejdetail.pdf).

<sup>2</sup> NYC Mayor's Office of Environmental Coordination, CEQR TECHNICAL MANUAL, 7-4 (2014).

<sup>3</sup> See NYC Mayor's Office of Environmental Coordination, Open Space Maps – Brooklyn, [http://www.nyc.gov/html/oec/html/ceqr/open\\_space\\_maps\\_brooklyn.shtml](http://www.nyc.gov/html/oec/html/ceqr/open_space_maps_brooklyn.shtml).

also unquestionably impact the community's ability to use and enjoy the park. Thus, DEP should coordinate with National Grid to minimize the time the community will be impacted by these actions.

The EIS should consider the cumulative impacts of all the separate actions expected to occur in this area and their time frames to propose appropriate mitigation measures.

*d. Operation and Maintenance*

In order to allow the community to better comment on the DEIS, the EIS should include a detailed description of what the operation and maintenance of the site (including tank cleaning) requires, and any impacts particularly with regards to noise, odor, air quality, and traffic.

## **VII. Alternatives**

The Park, designated as an alternative site for the Head End CSO tank and associated structures, provides important recreational, social, cultural, and environmental benefits. Siting the CSO tank here would be enormously disruptive, and the EIS should carefully consider all impacts. In particular:

*a. Extent of use of the property and retention of portion of Park*

Figure 6 of the DSOW indicates that DEP is considering the entire Park as an alternative site. However, prior comments by DEP indicate that only a portion of the Park would be used, and that effort would be made specifically to retain the tree cover on the southeastern end of the property. The EIS should specify how much of the Park would be impacted or made permanently unavailable by the Head End facility if this alternative is selected. The EIS should also consider at least one alternative which maximizes post-project availability of the Park.

*b. Impact on preexisting disparity in parkland availability*

The DSOW states that it will assess the effects on open space from operation of the facility, but does not discuss the impact of use of the Park site as an alternative. As discussed above, Gowanus residents have disproportionately meagre park resources available to them, compared to the number of residents those parks must serve. Eliminating most or all of the Park would compound this disparity. The EIS should specifically analyze the impact of use of the Park alternative on availability of open space, community character, and urban design.

*c. Additional maintenance*

Siting the Head End facility in the Park will increase the distance between the CSO tanks and the RH-34 outfall, requiring additional subsurface infrastructure. This additional infrastructure could increase construction impacts, make O&M more difficult, and decrease the capacity and reliability of the CSO system. In considering use of the Park as an alternative site, the EIS should analyze the impact of the additional infrastructure.

*d. Mitigation*

Mitigation for use of the Park as an alternative site may include creation of a temporary park or pool elsewhere, potentially at the nearby Con Edison facility. The EIS should specify the location of the replacement park, its size, and the amenities which will be available, taking into consideration the effect of sharing the lot with other facilities, if relevant. To the extent that these differ from the Park, the EIS should identify any resulting impacts on, e.g., availability of open space, neighborhood character, and urban design. The EIS should analyze these impacts with reference to a timeline that includes extended unavailability of the Park due to remediation on former MGP sites performed by National Grid.

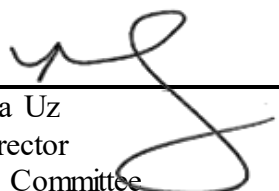
*e. Cost to the City*

We expect the City to base its decision between the various alternatives partially on cost. In order to be sure that this important decision is as transparent as possible, the EIS should include an estimate of the cost to the City of each alternative.

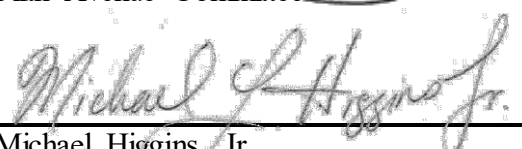
We thank you for your consideration of these comments.

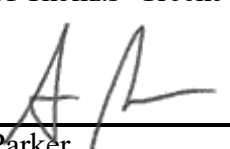
Sincerely,

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Michelle de la Uz  
Executive Director  
Fifth Avenue Committee


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Sue Wolfe  
President  
Friends of Thomas Greene Park

  
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Michael Higgins, Jr.  
Organizer  
Families United for Racial and Economic  
Equality (FUREE)

  
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Andrea Parker  
Executive Director  
Gowanus Canal Conservancy

/s

\_\_\_\_\_  
Mark Foggin  
Interim Executive Director  
Southwest Brooklyn Industrial Development  
Corporation

  
\_\_\_\_\_  
Rachel Spector  
Director of Environmental Justice  
New York Lawyers for the Public Interest



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Re: Comments on Draft Scope of Work for the Gowanus Canal CSO  
Facilities, CEQR NO. 17DEP040K for Owls Head CSO tank site

In addition to the comments submitted in partnership with Fifth Avenue Committee, Friends of Thomas Greene Park, Families United for Racial and Economic Equality, Southwest Brooklyn Industrial Development Corporation, and New York Lawyers for the Public Interest, we would like to make the following specific comments regarding the impacts the Owls Head CSO tank may have on environmental stewardship and education.

The Gowanus Canal Conservancy (GCC) is the community based environmental steward for the Gowanus Canal and Watershed. One of GCC's core organizational objectives is to activate and empower community stewardship of the Gowanus Watershed to reduce combined sewage overflow (CSO) into the Canal. GCC annually engages over 2,000 volunteers, students and community members in open space stewardship, environmental education and design advocacy to advance this objective.

Since 2010, GCC has headquartered these stewardship and education activities at the Salt Lot, the selected site for the OH-007 CSO detention tank. As the lot is owned by the city, and adjacent to the OH-007 outfall, we fully support the siting of this critical infrastructure to reduce CSO into the Canal. However, we want to draw attention to specific environmental impacts that this siting will have on these important stewardship and education activities, as well as the site improvements that have been made since 2010. We request that the environmental impact statement consider the following:

**Site Activity:** The site acts as a base for the activities below, which will be impacted by site investigation, construction and operation:

- Organizing, materials and nursery hub for an annual 1,000 volunteers stewarding street trees, bioswales and gardens in the Gowanus Watershed, increasing permeability to decrease CSO.
- Compost production site through a partnership with NYC Compost Project hosted by BIG Reuse, with an annual throughput of 400 tons of organic material. About 50% of

the compost produced enriches tree pits and gardens in the Gowanus Watershed, increasing plant growth and water retention.

- Education hub for an annual 1,000 local students and teachers to learn about environmental issues facing Gowanus and mitigation strategies.
- Demonstration site for rainwater harvesting, engaging an annual 50 participants in rainwater harvesting workshops.

**Site Improvements:** Since 2010, GCC has cultivated the following ecosystem improvements on the site, which will be impacted and potentially destroyed by construction. See attached plan for locations.

- The 2nd Avenue Street End Garden includes native plantings, retentive stone structures, seating and a boat launch, soaking up stormwater and providing a place for people to experience the Canal and the impacts of the OH-007 overflow
- The Salt Lot Berm Garden includes native plantings, bird houses and a pedestrian path to experience the Canal
- The Salt Lot Salt Marsh was planted in 2012, and is the only patch of *Spartina patens* and *alterniflora* on the Gowanus Canal, restoring the historic ecology of the Gowanus creek and salt marsh.
- The NYC Compost Project hosted by GCC and BIG Reuse includes \$500,000 of capital investment, including native plantings and stormwater retention across the site.

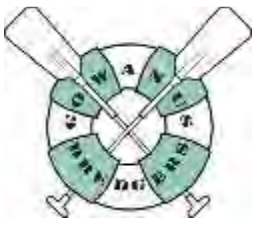
Thank you for your consideration of these comments,

A handwritten signature in black ink, appearing to be the initials 'AA' followed by a horizontal line.

Andrea Parker  
Executive Director  
Gowanus Canal Conservancy

# Site Improvements Plan





# Gowanus Dredgers CSO DSOW Comments

**Captain**

Bill Duke

**First Mate**

Lee Reiser

**Secretary**

Tim Gamble

**Treasurer**

Owen Foote

**Trustees**

Bart Chezar

Eymund Deigel

Katina Johnstone

Agnes Michalek

The following comments represent conversations with community participants in the PLACES effort, members of the Gowanus Dredgers Canoe Club, and participants in our 501c3 Organization's programs

Rasheed Lucas, Project Manager  
Wastewater and Special Projects  
Bureau of Environmental Planning and Analysis  
New York City Department of Environmental Protection  
59-17 Junction Boulevard, 11th Floor  
Flushing, NY 11373  
RLucas@dep.nyc.gov (submitted via mail and e-mail on 6/16/17)

Mr. Lucas,

The Gowanus Dredgers Canoe Club, a not-for-profit organization serving the shorelines of South Brooklyn as well as the greater New York / New Jersey estuary, respectfully submit comments Attached please find comments from the Gowanus Dredgers Canoe Club regarding DEP's Draft Scope of Work to prepare a Draft Environmental Impact Statement for the Gowanus Canal Combined Sewer Overflow (CSO) Facilities Project scoping document. Thank you for proceeding with this important project that when complete, will reduce sewage discharge to the Gowanus Waterway by up to 80%. However, we would like the scoping document expanded to include the following areas of concern:

**1. Wastewater:**

- a. Evaluate options and costs for elimination of sewage discharge to the Gowanus Waterway.
- b. Consider an option that would capture and treat or detain wastewater on both the Head End Site and the Owls Head site during storm events, therefore reducing the impact to Combined Sewer Overflows. If the Project needs to be modified to finance this option, the Project should be re-scoped.

**2. Environmental & LEED:**

- a. Alternative site selection options should be considered for each facility. Locating both facilities within the projected 100-year flood zone is poor planning and should be avoided. As condemnation is being considered, site selection should not be limited to City-Owned location and neighboring properties.
- b. The project should include and forecast environmental impacts anticipated as a result of the planning actions expected to follow the Gowanus PLACES study.
- c. The Project should analyze an alternative to any proposed reconstruction of bulkhead and seawalls to allow future use as a community dock. This area should be designed in concert with the Billion Oyster Project and the Gowanus Dredgers Canoe Club as continued water access and use of the public launch is essential for public health and safety – especially if an emergency landing is needed.
- d. The Project should analyze the impact of including a community dock, accessible 365 days / year, 24-hours/ day and adequate lighting should be provided to illuminate the dock and not the water from dusk until dawn. The community dock should be Americans with Disabilities Act (ADA) complaint for access on and off the water. Due to space constraints, access on and off the dock (especially at low tide) should be analyzed to not comply with ADA via waiver approval but provide reasonable accommodations for the disabled.
- e. The project's seawall should be analyzed to accommodate visiting vessel access, at low or no cost, when providing a community amenity such as the Waterfront Museum or Tugboat Pegasus. To achieve this, the handrails proposed along the bulkhead would be operable and have cleats / tie-up and utility connections among other needs. The North River Historic Ship Society should be consulted for details on specific accommodations.
- f. The scoping document should disclose LEED certification goals. Project goal should be LEED Platinum with a minimum acceptable LEED level for the Project to be LEED Gold.
- g. One Environmental Impact Statement should be prepared for analysis of both projects and should not be separated due to phasing.
- h. The Project should be evaluated to have a net zero (or a net positive) energy footprint.
- i. The project should be evaluated to include alternative power generation capacity by using geothermal, wind, sun or canal current & water.

PO Box 24403

Brooklyn, New York 11202

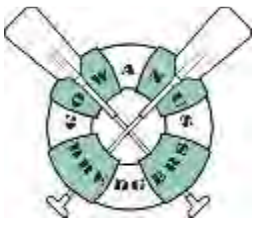
t: 718.243.0849

e: gdredgers@gmail.com

www.gowanuscanal.org

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**Captain**

Bill Duke

**First Mate**

Lee Reiser

**Secretary**

Tim Gamble

**Treasurer**

Owen Foote

**Trustees**

Bart Chezar

Eymund Deigel

Katina Johnstone

Agnes Michalek

3. **Flood mitigation:**
  - a. The Project proposes to evaluate a design to current flooding requirements but may have a capital life of 50 years. Design environmental analysis should reflect Base Flood Elevation projected for the capital life of the project to disclose potential impacts.
  - b. The scoping document does not disclose timeline for implementation of each site.
4. **Street life:**
  - a. The Project creates a nuisance and is a missed opportunity for enhancing the neighborhood. After hours, the Gowanus neighborhood streets currently serve as illegal dumping grounds and provide safe haven for prostitution, drug use and sales. These problems will be exacerbated by walls of inactive evening and weekend uses at street level.
  - b. The Project should analyze an alternate development program with manufacturing retail, art gallery and community facility program as street level, specifically along the waterfront, 2<sup>nd</sup> Avenue, Nevins and Douglas Street frontage. These uses, occupied below the BFE, should encourage pedestrian patronage (not cars) and the maximum size of these spaces should be no less than 40,000sf for each site and no use should exceed 15,000sf per development site. Unlike residential use, these uses are allowed within the flood level.
  - c. The Project should be analyzed to include low-cost or free community facility space for a community boathouse and educational center.
5. **Community Benefit:**
  - a. The 50ft esplanade amenity at the Head End Site should have active, programmed uses, protected from the weather to ensure a vibrant and active public space.
  - b. A similar 50ft amenity area should be provided along the shorelines of the Owls Head Site.
  - c. Open space analysis should include and evaluate improvements to the public launch site at the terminus of 2<sup>nd</sup> Avenue.
  - d. The Project should include analysis of the benefits of reconstruction of the existing launch site to accommodate launching and landing of powerboat vessels.
  - e. The Project should be analyzed to include community facility space at both locations. The Project should analyze and disclose the cost of providing accommodations for the growing youth population of the neighborhood should be considered, including day care as well as lower and middle school education. It is understood that to provide such amenity, the project may need to be re-scoped at a higher density.
6. **Public Transportation:**
  - a. The Project should expand the Study area to include analysis of and potential need for restoration of the B71 MTA Bus and to ask the MTA to present to Community Board Six after findings are published.
  - b. The Project should restrict vehicle use to low or no emission vehicles and the analysis should include alternative fueling stations within any proposed parking on both sites.
7. **Parking and Traffic:**
  - a. The Project should consider *increasing* the number of parking spaces at the Owls Head Site to allow for public parking of private vehicles. This lot should be subsidized by the City to maintain a 50% below market rate cost for parking and should be open 7 days a week supporting the existing uses of the area and the public boat launch adjacent to the Owls Head Site at the end of 2<sup>nd</sup> Avenue.
  - b. Accommodations for temporary boat trailer parking evenings and weekends should be analyzed to be included in the lot or on 2<sup>nd</sup> Avenue.
  - c. Bike share and bicycle uses within ½ mile of each facility should be analyzed for relocation and better coordination with traffic needs of Gowanus
8. **Scale, Height & Density:**
  - a. The Project should create a series of street-level and Canal-level perspectives so the community can better understand the scale of a new building at the water's edge and parking uses at street level.
  - b. The Project should evaluate providing below-grade parking accommodations.
  - c. Within one week before the Community Board public hearing, the Project should float 20 balloons, at each location, at a height representing the approximate top of the bulkhead or other highest structure anticipated level for the Project. The event should be announced, should last for a minimum of four hours, and should have a scheduled "rain date" in the event of inclement weather.

PO Box 24403

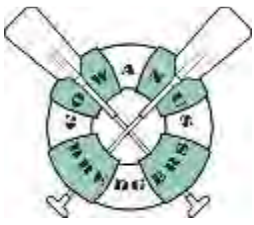
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6/15/17 Photo of Tugboat, Gowanus Bay



6/15/17 Photo of Culver Viaduct, Gowanus Canal

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The Gowanus Dredgers Canoe Club is a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code, contributions are tax deductible to the extent allowed by law.

**From:** Paul [<mailto:polozito@gmail.com>]  
**Sent:** Tuesday, May 16, 2017 7:14 AM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

This email constitutes my public comment to the *Draft Scope for the Gowanus Canal Combined Sewer Overflow Facilities Project Environmental Impact Statement*.

The City of New York Water-Supply Distribution Gowanus Station building contributes physically to the historic character of the landmarked Gowanus neighborhood, and is a mile marker in the history of the New York City water supply.

Removal, modification, and/or demolition of the east-facing, facade would significantly and negatively impact the Gowanus community and the history of the wider community.

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal. Further, I request that DEP acknowledge the building in the Final EIS.

Sincerely,

Paul Lozito  
Bronx NY



# GOWANUS CSO FACILITIES

MAY, 4 2017

PUBLIC SCOPING MEETING

## COMMENT SHEET

The New York City Department of Environmental Protection (DEP) appreciates your attendance at today's public scoping meeting on the Gowanus Canal Combined Sewer Overflow (CSO) Facilities Project. The Draft Scope of Work for the Environmental Impact Statement (EIS) was issued on April 4th, 2017, and distributed for public review and comment. DEP would like to hear your comments on the Draft Scope of Work. Please submit your comments today in the space below or via e-mail to [rlucas@dep.nyc.gov](mailto:rlucas@dep.nyc.gov) (please use the subject heading "GOWANUS CSO DSOW COMMENT").

NAME: Brad Vogel  
AFFILIATION: Resident of Gowanus  
ADDRESS: 365 Bond St. Gowanus  
E-MAIL: Brad.Vogel@gmail.com

My chief concern is for the historic Gowanus  
Station building at the northeast corner  
of ~~Butter~~ the "Head of Canal" CSO  
tank site. The structure, at the corner  
of Butter & Nevins, should be retained,  
as it contributes to the streetscape  
of the neighborhood and the ornamental.

Sculptural work in the gable of the east facade, in particular, imparts an irreplaceable sense of place. The words "Gowanus Station" and their import convey an important aspect of Gowanus' history — the interrelationship of humans and water, and the efforts to improve the water quality of the Gowanus Canal. The outer walls of the structure, too, fit in with the neighborhood's feel and should be retained as much as possible.

Please do not demoralize the Gowanus Station structure as part of the CSO Tank work. I know a good number of my neighbors feel the same way and would make the same request.





# GOWANUS CSO FACILITIES

MAY, 4 2017

PUBLIC SCOPING MEETING

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NAME: Brad Vogel  
AFFILIATION: Gowanus Dredgers  
ADDRESS: 365 Bond  
E-MAIL: Brad.Vogel@gmail.com

- Please maintain canoe, kayak and other watercraft access at the foot of 2nd Ave

- Please account for any loss of watercraft docking space in 6th St. Turning Basin by calling for replacement access

- Please ensure that Carroll Street Bridge CSO (historic, in stone bridge abutment) stays in place during High Capacity Sewer Main replacements on Carroll Street.

This brick-faced, contributing historic element is located within the designated city landmark site per the original landmark designation report.





**Environmental  
Protection**

59-17 Junction Blvd.  
Flushing, NY 11373

**TICKLER:**

**From the Commissioner's Office  
Correspondence Routing Slip**

**Log #:** 161394

**Date Routed** 5/24/2017

**Due Date** 6/7/2017

**Source Code:** CTU

**Priority Status** Normal

**Routing Information**

**Person Responsible:** ALEXANDRAESPINOSA

**cc:**

**Bureau Responsible:** BEPA

**Instructions:** N/A

**Notes:**

**Letter Information**

**Primary Correspondent Information**

**Name:** Linda Mariano **Organization:** FROGG

**Address:**

393 President Street

Brooklyn NY 11231

**Secondary Correspondent Information (On Behalf Of)**

**Name:** N/A **Organization:**

**Address:**

**Date of Letter:** 5/19/2017

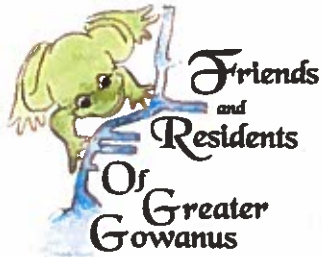
**Reference Code:** N/A

**Location of Problem/ Account Information:** N/A

**Subject of Letter:** Gowanus Canal Combined Sewer Overflow Facilities Project Environmental Impact Statement

Please respond to the attached correspondence as requested and return once closed out to Cynthia Dilan with Log Number indicated clearly. Please contact Cynthia at (718) 595-3478 or via e-mail if you have any questions.

161394



393 President Street  
Brooklyn, NY 11231

May 19, 2017

Vincent Sapienza Acting Commissioner  
Bureau of Environmental Planning and Analysis  
New York City Department of Environmental Protection  
59-17 Junction Blvd.  
11th Floor  
Flushing, NY 11373-5108

Greetings Mister Sapienza, regarding the comment period for the Draft Scope for the Gowanus Canal Combined Sewer Overflow Facilities Project Environmental Impact Statement.

I have been CAG member since the designation of the Gowanus Superfund. I am a Gowanus resident since 1976. I am a co-founder of a Gowanus based community organization, called FROGG - the Friends and Residents Of the Greater Gowanus.

Please read the following comments regarding the Draft Scope for the Gowanus Combined Sewer Overflow Facilities Project Environmental Statement.

My comments concern the sites proposed for the 2 retention tanks.

I believe the proposed demolition of the 2 privately owned sites, described below, for the CSO retention tanks, would have an adverse significant environmental impact on the Gowanus Corridor.

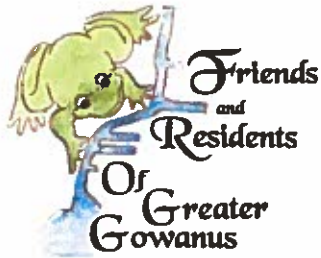
A brief description of these privately owned sites are as follows (for a more thorough description, please see the appended details).

1. BLOCK 411 LOT 24 Address 234 Butler Street.

History: This site was previously City owned, and was the Gowanus Pumping Station & Service Building, which included the adjacent bulkheads in the Gowanus Canal. This site included a one story structure along Nevins Street, which was originally constructed as a wagon shed for the borough's storage yard, circa 1888.

This site includes 2 separate back structures: a long narrow building along Nevins Street, constructed about 1988, and the more elaborate two story office building and storage building, which encloses the water departments storage yard. The two story office building has corbeled brick work quoins, corbeled cornice and a flat roof. Terra Cotta panels set in the classically styled stepped parapet read "City of New York Water Supply - Distribution, Gowanus Station." A medallion surrounded by a laurel wreath at the center and scrolls at the corners completed the composition. The State Office Of Historic Preservation deemed this site eligible for the State Register of Historic Preservation as inclusive and contributing to the cultural resources of the Gowanus Canal Corridor Historic District.

161394



2. BLOCK 418 LOT 1 Address 242-244 Nevins Street. Original construction in 1905. This site consists of 4 privately owned buildings, and includes the film company, Eastern Effects, which has produced the successful HBO series, The Americans. The State Office Of Historic Preservation has deemed this site inclusive and contributing to the cultural and historical resources of the Gowanus Canal Corridor Historic District. There is sufficient written material, which I am able to provide, which suggests that this was the site of Freek's Mill Pond and a Native American Burial Ground.

FROGG urges the City Of New York DEP reconsider the use of eminent domain for these significant historical properties based on the negative cultural and historical impact this would create for the Gowanus Historic District.

Further support for my comments can be found in the Louis Berger Group Inc. assessment in 2009. The survey is titled: Phase 1A Cultural Resource Assessment - Gowanus Canal Corridor Rezoning Project. The City of New York Water Supply Distribution, Gowanus Station. Block 41, Lot 24.

**FINDINGS OF THIS SURVEY:**

"Sites at the north terminus of the Gowanus Canal at Douglass Street, the pumping station and associated structures [which include the above 234 Butler St. site] were completed in 1911. By the end of the nineteenth century, the canal, which had been created by dredging the existing creek, was the dumping ground for household and industrial waste from the community that developed along its path and residents wanted the canal filled. To alleviate the problem, a flushing system, which included a pumping station between Douglass and Butler Streets and a flushing tunnel, was constructed (1905-1911). to pump water from the canal to the bay. "

If the Draft Settlement is finalized by EPA after a public comment period, the City will need to perform an EIS. Although the Draft Settlement will allow the City to do demolition after acquiring the privately owned sites, prior to any demolition, the City, along with the State Office Of Historic Preservation, must address, with proper protocol, the historic preservation impacts of their acquisition. The tank construction in these locations must be preceded by the protocol covered by Section 106 of the National Register of Historic Places, and the State Historic Preservation Act. aka Section 14.06, which includes an archaeology component.

Sincerely,

A handwritten signature in black ink that reads "Linda Mariano -".

Linda Mariano Officer and co - founder for Friends and Residents Of Greater Gowanus  
393 President Street  
Brooklyn, New York 11231

Draft Scope for the Gowanus Canal Combined Sewer Overflow Facilities Project Environmental Impact Statement

cc Rasheed Lucas Project Manager

**BLOCK** 411    **LOT** 24    **FIGURE** 31    **ADDRESS** 234  
**HISTORIC NAME** Pumping Station & Service Building  
**CONST. DATE(S)** 1926    **ALT. DATE(S)** c.1990  
**DATE SOURCE** NYC-DOB    **CONTRIBUTING?** Y

Butler Street



**CURRENT USE** Sanitation truck parking & repair

**DESCRIPTION**

4 buildings: 2-story industrial-office building (c.1925). Walls are clad in brick laid in American common bond under a side-gable roof with cast-stone coping; a terra cotta plaque bearing the building's name is located in the Nevins St. gable end; scrolled keystones over 2nd-floor windows with segmental arches, consisting of brick infill & 1/1 metal-sash replacement units; cast-stone stringcourse. 1- & 2-story buildings (c.1925) designed in a utilitarian style with corbelled brick walls laid in American common bond & scrolled keystones over window openings with segmental arches & brick infill. 1-story building designed in a utilitarian style clad in brick laid in running bond (c.1990) located within complex.

**HISTORY**

The Gowanus Station was part of the larger city-owned complex that included the adjacent pumping station & bulkheads. The 1-story structure along Nevins St. was originally constructed as a wagon shed for the borough's storage yard (SB 1888, 1908, 1933, 1951, 2008; BERH-WD 1926).

**BLOCK** 418    **LOT** 1    **FIGURE** 31    **ADDRESS** 242-244  
**HISTORIC NAME**  
**CONST. DATE(S)** c.1905, c.1920, c.1955    **ALT. DATE(S)** c.1940, c.1980  
**DATE SOURCE** SB, VE    **CONTRIBUTING?** Y

Nevins Street



**CURRENT USE** Construction services

**DESCRIPTION**

4 buildings designed in a utilitarian style: 2-story industrial-office building (c.1905) clad in brick laid in running bond under a parapet with cast-stone coping; 3 small loading bays & two garage openings with metal roll-down garage doors with sliders on the second floor; 1-story industrial-office building (c.1920; c.1940) in an L configuration clad in brick laid in running bond with pilasters under a parapet with cast-stone coping; 1 metal door under a shed-style-with-sign& awning & 4 metal roll-down garage doors along Nevins St.; a c.1980 storefront addition with aluminum-&-glass entry doors, transoms, & display windows & 1/1 fixed-light windows under aluminum batten seam mansard roof; large 1-story warehouse (c.1955) comprised of 3 gable-front sections; 1-story, flat-roofed industrial building (c.1940) covered in stucco with a corrugated metal roof with a metal roll-down garage door. Property includes a parking area that is enclosed by the 3 buildings, a brick wall, & a corrugated-metal gate.

2 Attached Images





Friends of Thomas/Greene Park

To: EPA Region 2 Superfund Director, Walter Mugdan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
Acting Commissioner Department of Environmental Protection, NYC

We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

	Name	Address	Email	Phone
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3	Diana Guinty		diana@ geniuscanal conservancy.org	
4	Carlos Yeps	217 57th St.	carlseyeps@ gmail.com	
5	Christine Petro	1144 Dean St	christine.petro@ gmail.com	
6	Laura Moran	182 West 4th St, NY, NY		
7	Michael Cunday	21 West End Ave NY, NY		
8	Denise Mitchell	2105 Foster Ave	denisemitchell416@ gmail.com	
9	Wylene Mitchell	104 Carlton	wylenemitchell@ gmail.com	
10	Monique Price	2105 Foster Ave	selinaprice69@ gmail.com	

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	Name	Address	Email	Phone
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3	Jack Donovan	546 40th St. APT 0 Brooklyn, NY 11232	jackbdonovan@yahoo.com	646-6887994
4	Georgina Washburn	378 Degraw	georgewashingfub@gmail.com	718-344-3712
5	Jennifer Mittelstaedt	378 Degraw	jen.mittelstaedt@gmail.com	814-441-9891
6	Matt Hall	343 4th Ave	matt.hall@gmail.com	646-789-5282
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8	Victoria Elliott	134 W 113th St	telliott8@gmail.com	303 887 4482
9	Gabriela Bhaskar	3333 Broadway, D3F New York, NY 10031	gabriela.bhaskar@gmail.com	530 391-3217
10	Sid V.	3260 E. 87th St Bronx, NY, 10463	SV2492@columbia.edu	269-522-5226



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	Name	Address	Email	Phone
1	DECCA MULDOON	197 Malcolm x Blvd. Apt 3B	dmm2235@ Columbia.edu	
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3	Mario Vanegas	" "	m.vanegas5@yahoo.com	
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*JB*

	Name	Address	Email	Phone
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3	William nek	244 Bond St		718-625-5646
4	Ameya Biradavolu	914 8th Ave	abiradavolu @ F. 5th ave. org	_____
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6	Sandra Garcia	J.A. Vice President 574 Warren St 66	S Garcia yahoo.com	(347) 666-2190
7	ARTIMIVA CIVITRON Aida	272 Wyckoff St		
8	Pomero	272 Wyckoff St.		718-237-1479
9	melissamays	442 Columbia St		
10	Cindy Mays	442 Columbia St	C.Mays0325@gmail.com	

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May 20 - 2017

	Name	Address	Email	Phone
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3	John Dalton	3411 Brown	"	
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8	London Tran	523 8th St		
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10	SALLI SLAVINSKI	711 CARROLL ST. APT 11 BROOKLYN NY 11215	SALLI/SLAVINSKI@HOTMAIL.COM	



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May 20 - 2017

	Name	Address	Email	Phone
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8	Ben Leer	308 7th Ave BK	benj.leer@gmail.com	
9	SHARI BAITCHER	424 4th Ave BK	shari.baitcher@gmail.com	
10	Jackie Capone		Jcapone@gmail.com	
	Michelle Gluck		michellegluck16900@gmail.com	

Friends of Thomas/Greene Park

To: EPA Region 2 Superfund Director, Walter Mugdan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
Acting Commissioner Department of Environmental Protection, NYC

We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

May 20 - 2017

	Name	Address	Email	Phone
1	Sapna Advani	339 Douglass St	sapnaadvani@gmail.com	
2	Kelly Haran	11 Schermerhorn St. 11201	beatles6523@yahoo.com	
3	Rachel Jacobs	250 4th Ave	racheljacobs@gmail.com	
4	Bn Fey zhey	1284 Ocean Ave.	bnfzhey@gmail.com	
5	Christina Kieley	5th St. Bklyn		
6	Autumn Hartley	202 29th St. Brooklyn	SlothHugger96@gmail.com	
7	Clara Rios	clara2socks@gmail.com		
8	Atrah Raisa	1406 35th St. 11218	ar653m@bhsec.bard.edu	
9	Wendy Woon	103 3rd St #1 Brooklyn 11231	wendywoon@mac.com	
10	SARA TORRES	601 W 115th St # 107	stornesvega@gmail.com	

Friends of Thomas/Greene Park

To: EPA Region 2 Superfund Director, Walter Mugdan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
Acting Commissioner Department of Environmental Protection, NYC

We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

May 20 - 2017

	Name	Address	Email	Phone
1	PK RAMANI	199 Bergen St Brooklyn, NY 11217	pkramani@gmail.com	
2	SASHA CHAVARRAZZE	199 BERGEN ST	sashachav@grid.com	
3	Freddy Poe	597 Central Ave 11207 Brooklyn	rddefpy@yahoo.com	
4	Michelle Ocampo	42 Woodhull 11231	michelle41220@yahoo.com	
5	Megan Finn	712 45th St 4D	finnmeg30@gmail.com	
6	Adam Wilson	674 Vanderbilt St. 11218	adamwilson.ej@gmail	
7	Joe Dolinsky	676 5th Ave Bk NY	joedolinsky23@gmail	
8	Vincent Aloï	156 Berkeley Pl.	vinnyaloi@hotmail	
9	Tessa Hersh	7 Greene Ave BK NY	tessahersh@gmail.com	
10	Maryam Zofa	498 Bergen St BK NY	maryam2@yahoo	



Friends of Thomas/Greene Park

To: EPA Region 2 Superfund Director, Walter Mugdan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
Acting Commissioner Department of Environmental Protection, NYC

We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

	Name	Address	Email	Phone
1	SANDRA CORCORAN	304 Hides ST Brooklyn, NY 11201	SCORCORAN@ CORCORAN.COM	9175923631
2	Joanna BROWN	586 7th Ave #212 Brooklyn, NY 11215	Joanna.Brown @CORCORAN.COM	917 916 5985
3	Lucy Perry	237 Union ST Brooklyn NY 11231	lucyperry@gmail.com	917-880-6840
4	PAUL OANSON	360 FURMAN ST Brooklyn NY 11201	POANSON16(AT)GMAIL.COM	718 701 5031
5	Juliette Garcia	400 E 57th ST 8F NY NY 10022	juliette.garcia @CORCORAN.COM	646 721 0113
6	Michael Pomer	830 18th ST Brooklyn, NY 11215	michroar@ hotmail.com	917-805-8585
7	Joh A Bataille	110 Warren ST Brooklyn, NY 11211	Joh.A.Bataille@ gmail.com	516-817-6754
8	Suzanne Wolf	1 Kensington Pl. Brooklyn 11201	SEW@CORCORAN .COM	718-923-8095
9		145 Henry ST Brooklyn, NY 11201	MAL@CORCORAN.COM	718-923-8002
10	James Crow	139 Bond ST Brooklyn 11217	James.Crow@ CORCORAN.COM	718-923-8061



Friends of Thomas/Greene Park

To: EPA Region 2 Superfund Director, Walter Muggan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
Acting Commissioner Department of Environmental Protection, NYC

We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

	Name	Address	Email	Phone
1	Azra Sahion			646-278-4620
2	Macie Rosaro			847-243-2555
3	Ronald Wright			914 648 2022
4	Nathanel Mogallon			917-818-6151
5	Rubayat Ruba			347-549-8342
6	KEYLA CUENCA			646-641-4079
7	Jinhao Zhen		ih.zhenunhao@ms28.org	646-705-9364
8	Mariana Bonola		<del>irene@ms28.org</del>	347-356-0598
9	Irene Rahman	82 Lassa St Hi!	ih.Rahman@ms28.org irene@ms28.org	347-935-0509 Hi! call me!
10	Kymoy Philip			

Friends of Thomas/Greene Park

To: EPA Region 2 Superfund Director, Walter Mugdan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
Acting Commissioner Department of Environmental Protection, NYC

We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

*JB*

	Name	Address	Email	Phone
1	Gladys Lorenzo	465 Columbus St	Gladys.Lorenzo69@yahoo.com	(347) 817-8433
2	Diana Felix	572 Warren St	DianaFelix@yahoo.com	646-804-9699
3	Zaira Rivas	135 Reda	'	718-669/412
4	Zaira Rivas	135 Reda	Zaira Rivas	718/669/412
5	Smith Paula	185 NEVINS ST		347-214-1020
6	Karen Blonde l	444 Columbus St	keblondel63@gmail.com	718 809 2070
7	Juliette Brava	142 Grattan St Brooklyn, NY 11237	julieebrava@gmail.com	347 622 1630
8	Sabine Aronowsky	41 St. Mark's Place #3 Brooklyn NY 11217	Sabine13@gmail.com	917 657 2972
9	Stee de Sere	41 St. Mark's Place #3 Brooklyn, NY 11217	stee desere@yahoo.com	917 330 6147
10	Genevieve Brunel	586 3rd ave #4 Brooklyn, NY 11215	bycoastale@gmail.com	702-235-4000



Friends of Thomas/Greene Park

To: EPA Region 2 Superfund Director, Walter Mugdan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
Acting Commissioner Department of Environmental Protection, NYC

We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

	Name	Address	Email	Phone
1	Kevin Torres	Brooklyn	18.TorresKevin@ms88.org	
2	Yin Chen		Yin.Chen@ms88.org	
3	Brian Rojas		18.RojasBrian@ms88.org	
4	Marylin Lopez		18.Lopezmarylin@ms88.org	
5	Kenny Espinoza		18.EspinozaKenny@ms88.org	646-581-5941
6	Theresa Cade		Theresa.Cade@ms88.org	
7	Liliana Alvarez		18.alvarezliliana@ms88.org	646-966-2313
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Friends of Thomas/Greene Park

**To: EPA Region 2 Superfund Director, Walter Muggan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
Acting Commissioner Department of Environmental Protection, NYC**

We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

	Name	Address	Email	Phone
1	Aishah Hoque		18.hoqueaishah@ms88.org	631-930-3724
2	Ashlihan Piedra		18.Piedraashlihan@ms88.org	347-283-1123
3	Odelis Corrales		18.corralesodelis@ms88.org	917-982-1005
4	Ellen Jiang		18.JiangEllen@MS88.org	347-977-5046
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Friends of Thomas/Greene Park

**To: EPA Region 2 Superfund Director, Walter Muggan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
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	Name	Address	Email	Phone
1	Zander			
2	Catie	Brooklyn	catieg04@gmail.com	718-687-7807
3	April	Brooklyn	18.000 300 300 18.000	917-643-4443
4	Shelcid	Brooklyn	shelcid29@outlook.com	929-233-2194
5	Cesar	Brooklyn	18.medinacesar@ms88.org	917-864-3593
6	Angie	Brooklyn	18.candangic@ms88.org	347-791-6425
7	Christion	Brooklyn	18.superfund@ms88.org	347-375-0308
8	Carlos Lopez		18.lopezcarlos@ms88.org	
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**To: EPA Region 2 Superfund Director, Walter Mugdan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
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We, the undersigned, ask that all agencies involved in the Superfund remediation efforts impacting Thomas Greene Park to guarantee continuity of the Park's amenities and services and use the remediation opportunity to increase park space in this already critically underserved area. We urge EPA to include clear requirements for a temporary park and park reconstruction, as well as community participation in those processes, in future orders and agreements with National Grid and all other responsible polluters. We ask DEP to include acquisition and construction costs for a temporary park and park reconstruction, for its concurrent scope to site the sewage holding tank and head house within Thomas Greene Park. We ask that the agencies analyze the Superfund remediation impacts in the context of relevant federal, state, and city orders, policies and legislation, which consider environmental justice and strive to raise and not diminish the quality of life for residents in the area and hold the responsible polluters accountable to provide for and grow Thomas Greene Park during the Gowanus Canal Superfund clean-up in Brooklyn, NY.

	Name	Address	Email	Phone
1	Kayla Delvalle	[Redacted]	18.delvallekayla@ms88.org	[Redacted]
2	Clare Ingram	[Redacted]	18.ingramclare@ms88.org	718-866-6124
3	Zaid Jommet	[Redacted]		
4	Emmanuel Bartolo	[Redacted]	18.bartoloemmanuel@ms88.org	[Redacted]
5	Angel Gustavo Des	[Redacted]	18.dgzAngel@ms88.org	846-416-7055
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Friends of Thomas/Greene Park

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	Name	Address	Email	Phone
1	Allen Newman	235 Bolter St. 11201	een@corcoran	917-868-6176
2	JJ	564 76th Street 11209	jjfuer@corcoran.com	646-385-5111
3	Paula	420 Washington 11238	BOEVENIS@YAHOO.COM	917-971-2750
4				
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Friends of Thomas/Greene Park

**To: EPA Region 2 Superfund Director, Walter Mugdan, NYC Mayor Bill de Blasio and Vincent Sapienza,  
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May 20 - 2017

	Name	Address	Email	Phone
1	Joe Ann Brown	572 Warren	Joeann1959Brown	347-282-3599
2	Imari Gayle	231 Hoyt St	imari.gayle@gohuwa	(718) 600-5848
3				
4				
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**From:** Kelly Carroll [<mailto:kcarroll@hdc.org>]  
**Sent:** Tuesday, May 09, 2017 2:05 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Cc:** Simeon Bankoff <[sbankoff@hdc.org](mailto:sbankoff@hdc.org)>; Brad V <[brad.vogel@gmail.com](mailto:brad.vogel@gmail.com)>  
**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

The Historic Districts Council requests that DEP **preserve the historic Gowanus Station building** at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, *should be saved in place as is*, not demolished or taken down and possibly replaced on the site in some fashion later.

This email constitutes our public comment on the Gowanus CSO scoping.

Sincerely,

Kelly Carroll

--

**Kelly Carroll**  
**Director of Advocacy & Community Outreach**  
**Historic Districts Council**  
**232 East 11th Street**  
**NY, NY 10003**

**212-614-9107 x. 11**

---

**From:** Lisa Ackerman [<mailto:lackerman@wmf.org>]  
**Sent:** Sunday, May 14, 2017 10:54 AM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Subject:** Help Save a Gowanus Landmark

Dear Mr. Lucas,

The historic Gowanus Station building at Butler and Nevins is an important reminder of the tremendous role the Gowanus neighborhood played in the formation of New York City from the colonial period through to the important contributions Gowanus made to the growth of industry in New York City in the 19<sup>th</sup> and 20<sup>th</sup> centuries. I hope the DEP will retain the historic Gowanus Station building at Butler and Nevins as plans for the CSO tank at the head of the Gowanus Canal take shape.

The east-facing facade of Gowanus Station, in particular, with its distinctive features to neighborhood *should be saved in place as is*, not demolished or taken down and possibly replaced on the site in some fashion later. Neighborhoods evolve but its identity, particularly in an area like Gowanus, is dependent on the ability to tell the story of its history through that powerful mix of historic buildings, new uses, and contemporary residents and businesses.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely, Lisa Ackerman 151-44 24<sup>th</sup> Road Whitestone, NY 11357

**From:** Matt Cline [<mailto:matt.cline@gmail.com>]  
**Sent:** Tuesday, May 09, 2017 2:11 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Cc:** Brad Vogel <[brad.vogel@gmail.com](mailto:brad.vogel@gmail.com)>  
**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, should be saved in place as is, not demolished or taken down and possibly replaced on the site in some fashion later.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Name: Matt Cline  
Address: 99 Bergen Street, 2R, Brooklyn, NY 11201

**From:** Matthew Coody [<mailto:matthew.coody@gmail.com>]  
**Sent:** Monday, May 15, 2017 12:15 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Subject:** Public Comment on the Gowanus CSO scoping

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, should be saved in place as is, not demolished or taken down and possibly replaced on the site in some fashion later.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Matthew Coody  
85 Java Street, F10  
Brooklyn, NY 11222

---

**From:** Sarah C Davidson [<mailto:davidson.sarah.85@gmail.com>]  
**Sent:** Friday, May 12, 2017 4:25 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Cc:** Brad V <[brad.vogel@gmail.com](mailto:brad.vogel@gmail.com)>  
**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, *should be saved in place as is*, not demolished or taken down and possibly replaced on the site in some fashion later.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Name: Sarah C. Davidson  
Address: 81 Fleet Place, Apt 9C, Brooklyn, NY 11201

--

Sarah Davidson

@sarahdavidson63  
(C): [847.431.6255](tel:847.431.6255)



---

**From:** Marlene Donnelly [<mailto:studio460@msn.com>]  
**Sent:** Tuesday, May 09, 2017 9:06 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Subject:** DEP Superfund Work for Red Hook CSO tank.

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as part of the work for the CSO tank at the head of the Gowanus Canal.

This building clearly contribution to neighborhood identity and history and should *be saved in place*, protected and maintained as a part of our cultural heritage.

Please accept this email as a public [comment on the Gowanus CSO scoping](#) currently underway.

Regards,  
Marlene Donnelly  
460 Sackett St  
Brooklyn, NY 11231

**From:** Katia Kelly [<mailto:pardonmeinbrooklyn@gmail.com>]

**Sent:** Wednesday, May 10, 2017 9:25 AM

**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>

**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, *should be saved in place as is*, not demolished or taken down and possibly replaced on the site in some fashion later.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Name: Katia Kelly

Address: 257 Carroll Street, Brooklyn, New York 11231

**From:** Jinny Khanduja [<mailto:jinnykk@gmail.com>]  
**Sent:** Friday, May 12, 2017 4:13 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, should be saved in place as is, not demolished or taken down and possibly replaced on the site in some fashion later.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Name: Jinny Khanduja  
Address: 941 Washington Ave, #2A, New York, NY 11225

Jinny Khanduja  
Director of Strategic Development  
Storefront for Art and Architecture  
Web: <http://storefrontnews.org/>  
Phone: [212.431.5795](tel:212.431.5795)

**Gallery:**  
97 Kenmare Street  
New York, NY 10012

**Office:**  
611 Broadway, Suite 634  
New York, NY 10012

**From:** Elizabeth Kurtulik Mercuri [<mailto:elizabeth.kurtulik@gmail.com>]

**Sent:** Tuesday, May 16, 2017 11:27 AM

**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>

**Cc:** Brad V <[brad.vogel@gmail.com](mailto:brad.vogel@gmail.com)>

**Subject:** Please save the Gowanus Station building

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, *should be saved in place as is*, not demolished or taken down and possibly replaced on the site in some fashion later.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Elizabeth Kurtulik  
564 1st Ave, Apt 19L  
New York, NY 10016

**From:** [joeandlinda393@aol.com](mailto:joeandlinda393@aol.com) [<mailto:joeandlinda393@aol.com>]

**Sent:** Tuesday, May 09, 2017 9:50 PM

**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>

**Subject:** Fwd: Help Save Gowanus Station

-----  
Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, *should be saved in place as is*, not demolished or taken down and possibly replaced on the site in some fashion later.

This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Name: Linda Mariano

Address:

393 President Street/[Gowanus](#)/Brooklyn 11231

**From:** Deborah Newburg [<mailto:deborah.newburg@gmail.com>]  
**Sent:** Thursday, May 11, 2017 10:21 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, *should be saved in place as is*, not demolished or taken down and possibly replaced on the site in some fashion later.

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This email constitutes my public comment on the Gowanus CSO scoping.

Sincerely,

Deborah Newburg  
318 Warren Street, #B2  
Brooklyn, NY 11201

Work address:  
316 Douglass Street, 2nd Fl  
Brooklyn, NY 11217

**From:** Maggie Poxon [<mailto:mpoxon@dunndev.com>]  
**Sent:** Thursday, May 11, 2017 10:49 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

I request that DEP retain the historic Gowanus Station building at Butler and Nevins as it makes plans for the CSO tank at the head of the Gowanus Canal.

The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, *should be saved in place as is*, not demolished or taken down and possibly replaced on the site in some fashion later.

---

This email constitutes my public comment on the Gowanus CSO scoping.

Thank you.

Sincerely,

Maggie Poxon  
6 Second Place  
Brooklyn, NY 11231  
718-388-9407, x13  
718-625-3183  
[mpoxon@ dunndev.com](mailto:mpoxon@dunndev.com)



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**From:** Peter Reich [<mailto:swiftfolders@gmail.com>]  
**Sent:** Thursday, May 11, 2017 2:31 PM  
**To:** Lucas, Rasheed <[RLucas@dep.nyc.gov](mailto:RLucas@dep.nyc.gov)>  
**Cc:** Brad V <[brad.vogel@gmail.com](mailto:brad.vogel@gmail.com)>  
**Subject:** Gowanus CSO Scoping - Public Comment

Dear Mr. Lucas,

I respectfully request that the DEP preserves our historic Gowanus Station building intact at the corner of Butler and Nevins as it finalizes planning of the CSO tanks to be buried at the head of the Gowanus Canal.



The east-facing facade of Gowanus Station, in particular, with its clear contribution to neighborhood identity and history, *must be saved in place as is*, not demolished or taken down to later be incorporated in some diminished fashion.

This email constitutes my public comment  
on the Gowanus CSO scoping,  
Thank you.

Peter Reich  
280 Nevins St.  
Brooklyn 11217