September 17, 2021

TO: City Planning Commission

RE: Gowanus Canal CSO Facility - Owls Head (ULURP Numbers C200320MMK, C200321PSK, and C200319PCK)

Gowanus Canal Conservancy (GCC) advocates and cares for ecologically sustainable parks and public spaces in the Gowanus lowlands while empowering a community of stewards. GCC currently occupies the Salt Lot along with partner non-profit Big Reuse through an agreement with the Department of Sanitation (DSNY). As current occupants of the Salt Lot, the selected site for the OH-007 CSO Facility, we are writing today with recommendations for site planning in order to protect critical services and provide community and ecosystem benefits.

Since 2010, GCC has headquartered community stewardship and education programs, and a native plant nursery at the BK6 Salt Lot. We understand that DEP is currently planning for 1) the construction of the 2nd Avenue and Salt Lot bulkhead between 2022 and 2023, required by the EPA as part of the Gowanus Canal Superfund1 and 2) the construction, between 2023 and 2028, and subsequent operation of the OH-007 Combined Sewage Overflow (CSO) detention tank. As current occupants of the site, we support the construction of this critical infrastructure to reduce CSO into the Canal, and agree that the Salt Lot, which is owned by the City and adjacent to the OH-007 outfall, is the most appropriate site.

However, we request that as a condition of ULURP approval, the City commit to 1) communicate effectively and regularly with site occupants, 2) provide support for relocation, and 3) produce a final site design that keeps the Salt Lot the eco-industrial heart of Gowanus. Displaced site components and programs include compost production, landscape maintenance, a native plant nursery, environmental education, and biodiverse restoration areas. The long-term design should also incorporate additional community benefits and ecosystem improvements, including public access areas, environmental stewardship education, ecological resources management, green job training, and interpretation of the new CSO infrastructure.

Of immediate concern is the need for a temporary home for GCC’s 8,200 square foot nursery, outdoor classroom, and maintenance facility, which will be entirely displaced at the end of 2021 in order for the City to begin bulkhead construction. The City has verbally communicated that they intend to support our relocation, but we have not yet received a firm commitment in writing.

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1EPA CSO Administrative Order for Remedial Action to the City of New York, March, 29 2021, Appendix
for a suitable temporary space and relocation assistance. As of this writing, on September 17, we do not know where we will move at the end of the year. It is critical that as a condition of this ULURP the City commits to and follows through on providing a temporary home to GCC’s existing 8,200 square foot facility during both bulkhead and tank construction.

The following pages provide detailed comments on needed process, existing conditions and recommendations for final site design, and build on GCC’s previous comments on the Draft Scope of Work for the OH-007 CSO tank.2

1. PROCESS
We ask that the City:

- **Work closely with current occupants to mitigate impact on current operations** - Given the multiple facilities on site, it is critical that DEP work closely with current site occupants to plan for a site design and construction process that minimizes and mitigates impact on current operations. We request that DEP coordinate the construction timeline with GCC and Big Reuse, provide ample notice for construction activities that will impact site operations and public programs, and provide support and a temporary site for any period of time that we need to relocate our operations and programs.
  - Given GCC’s imminent displacement at the end of 2021 due to bulkhead work, we ask DEP to help us secure and pay for a lease on a private site or provide us with use of a public site, such as the MTA site at 9th Street and the Canal or the water tunnel site located at 4th Ave. and Sackett St. A suitable site will need to accommodate GCC’s 8,200 SF operations footprint for a period of 2 years, from January 2022 through the end of 2024.
  - We understand that the City is exploring establishing a temporary site for DSNY operations on a parcel south of 5th Street during the period of tank construction from 2024-2028. We request that the City commits to accommodating both GCC and Big Reuse operations on this site with a minimum allocation of 18,200 sf, in line with existing space allocations.

- **Engage current occupants and other local stakeholders in the design process** - Per the Facility Plan, public outreach should be used to inform planning and design decisions.3 This outreach should specifically elicit feedback about replacement of current operations, public space design and programming, water access, and educational interpretation of grey and green infrastructure. Outreach to current occupants should be frequent and transparent, to ensure that the final site design supports ongoing operations. Additionally, particular attention should be paid to gathering feedback from ecosystem restoration experts, local teachers who use the Gowanus as a classroom, industrial businesses in the IBZ, boaters, and other local neighbors.

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2 June 16, 2017 Letter from Gowanus Canal Conservancy to DEP, Re: Comments on Draft Scope of Work for the Gowanus Canal CSO Facilities. CEQR NO. 17DEP040K for Owls Head CSO tank site
3 CSO-GC-SFS DES Facility Plan Report - OH-007, September 2017, Section 7.5
2. EXISTING CONDITIONS

Salt Lot: Existing Conditions (Gowanus Canal Conservancy)

FACILITIES AND COMMUNITY PROGRAMMING
Over the past decade, GCC, Big Reuse, and DSNY have built and maintained a number of improvements on the site, which will be impacted, displaced and/or destroyed by site investigation, demolition, and construction. Between 2014 and 2017 the site saw a $2 million renovation, spurred by an initial $500,000 in funding from District 39 participatory budgeting. GCC and Big Reuse operations currently comprise a combined 18,200 square feet of space. Site components include:

- **Salt Storage and Snow Response Facility**: DSNY uses the site as a base for Community District 6 snow response operations. Facilities include a covered salt storage shed and plow blade storage racks.

- **Compost Facility** (10,000 sf) Big Reuse operates a compost processing facility and residential food scrap drop-off. The large scale multi-bay compost facility features solar-powered aerated static pile technology, with an estimated annual throughput of 150 tons of organic material. GCC and Big Reuse distribute compost for public greening projects through compost pick-ups and giveback events. About 50% of the compost produced enriches tree pits and gardens in the Gowanus Watershed, improving plant growth and water retention.

- **Landscape Maintenance Facility** (1,200 sf) With a base of operations at the Salt Lot, GCC deploys landscape maintenance personnel to care for on-site gardens as well as off-site street trees, bioswales, and gardens throughout the Gowanus Watershed, increasing permeability to decrease CSO. Personnel includes full time staff, youth green job trainees, and an annual average of 750 volunteers. Facilities include equipment and material storage.

- **Lowlands Nursery** (6,000 sf) GCC operates a native plant nursery, growing and distributing over 4,000 native plants each year, with over a third planted at the Salt Lot.
and in gardens and tree pits throughout the neighborhood. Facilities include outdoor growing areas, a shade structure, propagation tunnels, and storage.

- **Outdoor Classroom** (1,000 sf) GCC hosts over 500 local students and teachers annually at workshops and field trips to learn about environmental issues facing Gowanus and mitigation strategies. Facilities include seating and work stations for 30 students, water quality testing area, and equipment storage space.

- **Office**: A small office space supports up to two Big Reuse and GCC staff working on site in inclement weather.

- **Planted gardens and restoration areas** (17,000 sf) Described further below in “Ecosystem Improvements and Performance”

**ECOSYSTEM IMPROVEMENTS AND PERFORMANCE**

For over a decade, GCC has planted thousands of native plants in demonstration gardens and restoration areas at the Salt Lot. This restoration work has yielded one of the most high-performing and biodiverse sites along the Gowanus Canal. The planted areas improve
Gowanus Canal water quality through erosion control and increased stormwater capture and filtration, managing an estimated 32,300 gallons per storm event. Native ecosystems found on site include a number of areas categorized as tidal wetlands by the Department of Environmental Conservation. Visitors have access to these ecosystems along a pedestrian path that includes viewing areas, water access, and interpretive signage.

Existing restoration areas and gardens span 17,000 sf and include:

- **Intertidal Marsh** (200 sf): Intertidal marsh is a tidal wetland zone located between low and high tide elevations, as defined in state tidal wetlands regulations. In 2012, GCC installed an intertidal and high marsh restoration along the northeast shore of the Salt Lot. This is the only patch of *Spartina alterniflora* on the Gowanus Canal, and continues to thrive at the edge of the site. Intertidal marsh species restore the historic ecology of

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4 DEC Tidal Wetlands Categories, [https://www.dec.ny.gov/lands/5120.html](https://www.dec.ny.gov/lands/5120.html)
the Gowanus creek and salt marsh, and provide habitat for mussels, crabs, fish, and a variety of shorebirds.

- **High marsh, Maritime Meadow, and Shrubland** (12,100 sf) High marsh is the upper tidal wetland zone located just above high tide elevation, as defined in state tidal wetlands regulations. High marsh on the Salt Lot includes wetland species such as Spartina patens, Iva frutescens, and Baccharis halimifolia. A diversity of additional native maritime meadow and shrub species thrive in these areas, providing habitat for birds, pollinators and other wildlife. Notable species include *Rhus typhina, Prunus maritima, Panicum virgatum, Monarda fistulosa,* and *Schizachyrium littorale.*

- **Emergent Marsh Rain Gardens** (2,600 sf) Site stormwater is directed to and managed by two rain gardens planted with emergent marsh species that include *Juncus effusus, Asclepias incarnata, Iris versicolor, Cornus amomum,* and *Cephalanthus occidentalis.*

- **The 2nd Avenue Street End Garden** (2,100 sf) In 2012, GCC installed a garden where 2nd Avenue meets the Gowanus Canal, providing much needed public space for people to experience the Canal. The space features native plantings, retentive stone structures, seating, and an informal boat launch and get down.

GCC has worked with scientists, students, and volunteers to document the biodiversity of the site during annual biological surveys, or bioblitzes, using iNaturalist and paper data sheets, collectively recording over 1,000 observations of over 250 species of plants, birds, fish, invertebrates, and mammals. Impacts to this biodiversity must be mitigated in the future site plan.

**Species Observations (iNaturalist)**

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6 Ibid
7 iNaturalist observations, Gowanus Canal Conservancy Salt Lot

https://www.inaturalist.org/observations?place_id=152219
DISPLACED 5TH STREET BUSINESSES
Directly across the street from the current Salt Lot site are 6 industrial businesses along 5th Street, all of which will be displaced by the City to place the CSO Tank. As the City has done with prior business displacements (e.g., the Greenpoint Relocation Program provided displaced businesses with total eligible moving costs or $50,000 per business), relocation support of a comparable amount should be provided, with particular assistance given to relocating these businesses in the Gowanus IBZ where possible.

3. DESIGN RECOMMENDATIONS
As DEP consultants note in the CSO-GC-SFS DES Facility Plan Report - OH-007 (Facility Plan), the OH-007 CSO Facility can be a model of civic infrastructure, integrating critical sewer infrastructure with community benefits and ecosystem improvements. At a baseline, any new design must include the existing programs and facilities that the community relies on: a landscape maintenance facility and native plant nursery, a compost facility, a DSNY salt storage and snow response facility, an outdoor classroom, and biodiverse coastal habitats. Additional new programs - public space, salt marsh restoration, a stewardship and education center, and interpretation for the new CSO facility - would greatly enhance the public benefits of the project. Below are recommendations for site design, construction and operations.

Salt Lot: Proposed Site Plan (Gowanus Canal Conservancy and SCAPE)

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8 CSO-GC-SFS DES Facility Plan Report - OH-007, September 2017, Section 6.8.3.8
FACILITY AND SITE DESIGN

- **Design and construct a Low Bulkhead** to minimize ecological impact and support further ecological restoration. The first action DEP must take on the site, in 2021, is construction of a bulkhead to support the Superfund dredging. DEP consultants note that a cantilever system is the more practical bulkhead system for the site, and detail two options for the height of the bulkhead: 1) at elevation 8 with a level grade behind, or 2) at the low water line with a sloped embankment up to finished grade. We strongly recommend the second approach where possible, both to protect existing ecosystems and support future ecosystem restoration. This low bulkhead could be constructed while preserving the existing vegetation along the waterfront, particularly the existing areas of intertidal marsh which extend to just above the low water line and require regular tidal inundation. This low bulkhead would then enable additional restoration of intertidal ecosystems with the larger site design.

- **Examine opportunities to increase CSO volume capture** at the OH-007 facility in relation to the proposed increase in population density as projected in the City’s rezoning proposal for the Gowanus neighborhood. As noted in EPA's Sept. 2019 correspondence with DEP regarding DEP’s proposed tunnel alternative, EPA is amenable to discussing a potential expansion of the volume of the CSO retention tanks if additional capacity is required to meet the needs of a growing population. While tank expansion might result in further delays to the CSO facility planning, other measures, such as CSO outfall consolidation, should be considered on this site to minimize CSO discharges to the Gowanus Canal to the maximum extent practicable.

- **Incorporate Existing Facilities.** The site design should incorporate the existing facilities described above. Sufficient space should be allocated to accommodate current operations, including: Salt Storage and Snow Response Facility, Compost Facility, Landscape Maintenance Facility, Lowlands Nursery, Outdoor Classroom, and Office.

- **Include space for a new Stewardship and Education Center** that houses landscape maintenance operations and expands community opportunities for education and green job training. This facility should include indoor classrooms and weather protected outdoor classrooms to accommodate experiential, place-based science and design-based learning, allowing local students to explore and document the canal’s ecology.

- **Include space for a new Green Industry Incubator** - The Facility Plan calls for purchasing 2 lots which currently host six industrial businesses that support 85 full time jobs. In order to offset the loss of these jobs in the Industrial Business Zone, the City should invest in a green industry incubator, with a focus on supporting businesses and jobs in the emerging green building sector, including green infrastructure construction and maintenance.

- **Provide interpretation of the CSO facility** - The OH-007 CSO facility is a major public investment that will provide critical management of combined sewage overflow into the Gowanus Canal and improve water quality. There is an additional need to further engage community members and students to interpret how this infrastructure works, and how

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9 Ibid, Section 6.2.9
green and grey infrastructure are part of the solution. Specific elements could include signage, interactive urban watershed models, and areas demonstrating green infrastructure and integrated stormwater management techniques. DEP’s Newtown Creek Wastewater Treatment Plant provides an excellent example of similar interpretation by the agency.

- **Provide waterfront public space** - The Draft Environmental Impact Statement (DEIS) for the overall Gowanus rezoning shows a serious deficiency in open space per resident, particularly active space. This site offers a unique opportunity to improve this ratio by creating a substantial new public space. There should be an accessible public path along the waterfront of the entire peninsula that connects larger public spaces on the 2nd Avenue Street End, the top of the CSO tank, the western tip of the peninsula, and the end of the 6th Street Basin. Programming and site design should include educational interpretation, a boat launch, demonstration gardens and seating areas.

- **Provide water access** at the 2nd Avenue Street End and the 6th Street Turning Basin - When defending the low active space ratio, the overall DEIS refers to the Gowanus Canal as “an active open space resource for kayaking and other water-dependent activities” and states that this is “expected to increase as accessibility and water quality improves over the analysis period, further enhancing the quality and availability of open space resources in the study area.” The City cannot sit back and “expect” this increase - they must commit to building boat launches on publicly owned land. A get down at the 2nd Avenue Street End, and an ADA accessible boat launch in the 6th St Turning Basin can help ensure that the Canal is accessible to all.

- **Provide safe and intuitive circulation** for all site users - Particular attention should be paid to clear and safe access for the range of vehicles and pedestrians that need to access the site facilities, ranging from snow plows to pedestrians.

- **Install biodiverse plantings** to restore ecosystem function - As noted in the Facility Plan, the site design should pay particular attention to restoring coastal ecologies and maximizing stormwater management across the site. Ecosystem design should reference the years of experimentation and observation that GCC and community partners have done on site, to restore Intertidal marsh, High marsh, Maritime Meadow and Shrubland, and Emergent Marsh and to provide habitat for observed species.

- **Install large scale intertidal marsh** on the western tip of the peninsula - Under the Superfund, Potentially Responsible Parties, including DEP, will be responsible for Natural Resource Restoration projects to restore ecosystem services that have been damaged through the contamination or clean-up. A large scale restoration project integrated into this project could be credited to the future settlement.

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11 CSO-GC-SFS DES Facility Plan Report - OH-007, September 2017 - Section 6.8.3.3., Section 6.8.3.5
We appreciate the opportunity to share these recommendations.

Sincerely,

[Signature]

Andrea Parker
Executive Director
Gowanus Canal Conservancy

*Salt Lot: Vision (Gowanus Canal Conservancy and SCAPE)*

Attachments:
Appendix 1 - GCC Oral Testimony at City Planning Commission Hearing, August 18, 2021
Appendix 2 - Additional Letters of Support
Diana Gruberg  
*Landscape Director*  

I’m Diana Gruberg, Landscape Director of Gowanus Canal Conservancy. Since 2010 we have headquartered community stewardship, education for local students, and a native plant nursery at the BK6 Salt Lot, the proposed site for the Owls Head CSO tank. While we support this critical infrastructure to reduce CSO into the canal, the City must commit to our 3 asks: 1) communicate effectively and regularly with site occupants 2) provide support for relocation, and 3) produce a final site design that keeps the Salt Lot the eco-industrial heart of Gowanus.  

Over the last decade we have planted thousands of native plants in demonstration gardens and restoration areas at the Salt Lot and 2nd Avenue street end garden. This restoration work has yielded the most biodiverse site along the Gowanus Canal, where for the first time in over a century you can now find salt marsh grasses supporting a community of mussels and crabs, reasserting the 400 acres of salt marsh that once existed here.  

Today, the 17,000 square feet of native ecosystems and public spaces found at the Salt Lot collectively manage all site stormwater while providing habitat for marine life, shorebirds, invertebrates, and small mammals. During annual biological surveys, we have documented over 280 species on the site, including many considered Species of Greatest Conservation Need by the state because they are vulnerable or imperiled in New York¹, namely the Great blue heron, Laughing gull, Mummichog, Atlantic silverside and Five-angled dodder.  

The City will be required to provide restoration under a likely Natural Resource Damages settlement as part of the Superfund, but this investment could get directed offsite to places like Jamaica Bay if there are no local options. The City must commit to keep these dollars and habitat here, in Gowanus, by dedicating a portion of this site for restoration of the critical habitat we have lost and will lose again with this project. The City must commit to include in the long term site design biodiverse plantings, soft waterfront edges, and a large-scale intertidal marsh installation integrated into public space.  

The health of our ecosystem depends on it.

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Jordan Heiden  
*Engagement Manager*  

Good morning. My name is Jordan Heiden, and I’m the Engagement Manager at the Gowanus Canal Conservancy. While we do support the critical infrastructure to reduce CSO into the Canal, the City must commit to: 1) communicate effectively and regularly with site occupants 2)

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¹iNaturalist observations, Gowanus Canal Conservancy Salt Lot  
https://www.inaturalist.org/observations?place_id=152219
provide support for upcoming relocation, and 3) produce a final site design that keeps the Salt Lot the eco-industrial heart of Gowanus.

In the last 10 years GCC has hosted over 5,000 local K-12 students on the Salt Lot for field trips to learn about environmental issues and potential solutions in Gowanus. Students test the water quality to investigate the impacts of combined sewer overflow and learn about grey and green infrastructure. They also propagate native plants to explore local ecosystems and biodiversity. These education opportunities engage local students (and their families) in the critical environmental issues facing Gowanus, and help build the next generation of environmental advocates.

The future site design should include space and support for a new facility for experiential, science, and design-based learning for local students. Additionally, site design should include a comprehensive interpretation plan for the Owls Head CSO facility including signage, urban watershed models, and demonstration green infrastructure. It is essential that we connect place-based learning to better understanding our urban environment. The City has demonstrated in previous installations that this type of work is possible, and we hope to see it for our site as well.

Our next generation of environmental stewards depends on this. Thank you.

Joanne Zhao
Youth Stewardship Manager and Nursery Coordinator

Hello, my name is Joanne Zhao and I am the Youth Stewardship Manager and Nursery Coordinator at Gowanus Canal Conservancy. While we do support the critical infrastructure to reduce CSO into the Canal, the City must commit to: 1) communicate effectively and regularly with site occupants 2) provide support for upcoming relocation, and 3) produce a final site design that keeps the Salt Lot the eco-industrial heart of Gowanus.

I’m here to talk about the importance of the Salt Lot, which is where many of our operations such as the native plant nursery and composting take place. I manage paid youth apprentices who grew up in Gowanus and Brooklyn area and introduce and integrate them into our work at GCC. Our site is where local youth can come experience and see the cycle of life for plants, animals, insects, and the seasons. This site is important because it seeds passion and excitement for hands-on work with the land, soil, compost, plants, and so much more. I grew up in Brooklyn and never dreamed of working in horticulture and public green space because I rarely saw it, let alone experienced it. Some local youth I interviewed for the paid environmental stewardship apprenticeship, have never worked with plants and soil before. I remember vividly interviewing a high school sophomore one year, and she told me she’s never even owned a house plant before. This stuck with me because it resonated with my own upbringing in a
low-income community of color and now, I feel very grateful and honored to work in horticulture and see youth’s eyes shine with interest as they move through the apprenticeship.

Some of the youth who go through our program did not even know jobs like this existed and some walk away with a new profound passion and interest in environmental work. This is why a site like the Salt Lot is incredibly valuable and needed in communities like Gowanus. It’s an opportunity to create a long loving connection with our planet, which can get lost easily in a city like NYC. In terms of where we stand now, we will need the City to provide a temporary site by the end of this year when site work begins, or our youth program will not be able to continue. We need this site to foster current and future youth with budding green thumbs and a passion for a healthy living planet and environment.

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Madison Myers
Green Team Senior Apprentice

Good afternoon my name is Madison Myers and I'm a Green Team senior apprentice with Gowanus Canal Conservancy. I'm an upcoming high school senior and I'm from Brooklyn. I would like to testify about the importance of the environmental work that happens at the Salt Lot, which will be displaced by the proposed combined sewage overflow tank. My experience with Gowanus Canal Conservancy working at the Salt Lot has been incredible. I joined the GCC team in the Summer of 2020. It was my first job. As a sophomore in high school I just saw it as a way to get paid at first, but to my surprise I ended up loving it. I was able to meet new people and learn new things. This program is important because it can give other youth an opportunity to help their community and also learn about it. Green Team is an opportunity for youth to learn about ongoing environmental issues in the community and also how they can help solve the issues. Green Team also helps with maintenance at their native plant nursery, like potting up plants, weeding, watering, and more. GCC was able to help me have a different outlook on a lot of things. I never realized how important trees were, not only for us but for the streets, clean air and the ecosystem as well. I never knew that those rain gardens that you see on the sidewalk helped with combined sewage overflow, which pollutes the Gowanus Canal almost every time it rains. I would've never learned these things without GCC and I want other youth to experience that as well. Growing up in Brooklyn I was never exposed to green spaces that much, I never noticed how many different types of plants there were and what they do for us. If I would've never worked for GCC I would probably still be clueless. This program also allowed me to experience new things. About 3 weeks ago I got the chance to cut phragmites, a highly invasive species in the water at Prospect park. The reason we had to cut down the phragmites is because they're so invasive and they start to grow out of control. If they would have continued growing they would have eventually taken over and they would have taken nutrients and sunlight from other plants in the area. Never in a million years did I think I would have the opportunity to do that. I was also able to see 2 farms that I never knew existed in Brooklyn! I would love it if other kids got the chance to experience that too. Without GCC and our home
base at the Salt Lot, I wouldn't have learned all the things I've learned and experienced the things I've experienced. I also wouldn't have been connected to the environment before.

Anthony Pimentel  
Green Team Senior Apprentice

Hi my name is Anthony Pimentel and I am a Green Team Senior Apprentice here at Gowanus Canal Conservancy. I would like to testify about the importance of the environmental work that happens at the Salt Lot, which will be displaced by the proposed combined sewage overflow tank. The Gowanus Canal Conservancy and our home at the Salt Lot is a necessity to the place we call New York City. Work such as maintenance, taking care of the street trees, in addition to visiting different places within the city has taught me a lot. These skills I have learned--I will be taking with me in the future as I go on into college fighting for my future. The green work that we have done has taught me to love my surroundings and the environment. The people I worked with taught me to persevere and to always be myself no matter the struggle. The collaborative work that we have done with other organizations and people looking to help our Earth has taught me that there is a way to get people interested in green work. The Salt Lot was the first place I had received a job and I ended up coming back a second year because I loved my experience the first time around and I just wanted to help even more. Growing up in the city, there is trash almost everywhere you go. There are people littering and smoking and driving, messing up the entire ecosystem. The amount of buildings that are being built is leaving little to no room for green space and without green space there will be no healthy air for our children to breathe and for generations to breathe healthy smooth air. The city is rough and being able to help it spread its beauty within different green spaces allows for other people to stop and pay attention to what we are doing. GCC deserves to be a part of the city’s plans because of how much work we have put into selling plants, care of city trees, care for rain gardens, volunteer events, and trips to help other places that need the experience that you gain when working with GCC at the Salt Lot. Finally, I want to thank GCC for helping me through my time of Covid and helping me transition into the next step of my life. This job is something that will stay with me forever as I grow old and help others around me. Thank you for listening.

Andrea Parker  
Executive Director

I’m Andrea Parker, Executive Director of Gowanus Canal Conservancy. As my colleagues have noted, we support this critical infrastructure to reduce CSO into the canal, however as a condition of this approval, the City must commit to 1) communicating effectively and regularly with site occupants, 2) providing support for relocation, and 3) producing a final site design that keeps the Salt Lot the eco-industrial heart of Gowanus.
As I testified here just a few weeks ago, Gowanus is severely lacking in parks and open space. The City’s DEIS for the Gowanus Rezoning shows that even with new open space created by the rezoning, there will be an adverse impact on the open space ratio, currently a fraction of the ratio the City recommends. Though the project before you today is a separate ULURP application, I urge you to think of the larger picture, and ensure that your recommendations help address the overall concerns and needs of the neighborhood.

As part of the overall rezoning, GCC has submitted comments outlining 10 additional acres of City land that should become open space in order to mitigate the adverse impact. 3.5 acres of that is on the Salt Lot. We have seen that DEP can create excellent public space in the Newtown Creek Nature Walk as part of that Wastewater Treatment Plant. Similarly, the agency should take this opportunity to integrate beautiful, immersive, educational and ecologically productive public space into this critical infrastructure. This should include restoring the outdoor classrooms and demonstration gardens, as well as investing in a much larger salt marsh restoration, to continue fostering environmental awareness in our next generation. It should restore water access at 2nd Avenue, and create an ADA accessible boat launch in the 6th St Turning Basin to ensure that the Canal is accessible to all. And it should consider and create space for two potential pedestrian bridges across the Canal, to connect residents and students from the new development to the west and north to this incredible public amenity.

Continuing to foster this eco-industrial heart, which provides both critical civic services and transformative experiences to a community, is going to require deep outreach and partnership with current site occupants, and the larger community. We appreciate the efforts that the agencies have made to work with us over the last 10 years, and in planning for this coming transition, and look forward to collaborating with the City over the coming years to advocate for a process and site design that addresses community needs. We ask today that you ensure that future administrations and agency staff continue to take and deepen a collaborative approach, by requiring commitments to public space, restoration, access and community outreach as part of this ULURP approval.
Appendix 2 - Additional Letters of Support

June 24, 2021

TO: Community Board 6
RE: Gowanus Canal CSO Facility - Owls Head (ULURP Numbers C200320MMK, C200321PSK, and C200319PCK)

My name is Jessica Dalrymple and I am a Volunteer Coordinator for the Gowan’s Canal Conservancy since 2013 who has maintained an art studio and teaching practice in Gowan’s since 2013. Today I am advocating for the long-term investment and protection of the BK6 Salt Lot, a biodiverse oasis in Gowanus that provides an abundance of ecosystem and community benefits, including compost production, landscape maintenance, environmental education, youth workforce development, ecological restoration areas, and native plant nursery operations.

I fully support of the Superfund requirement for DEP to construct bulkheads along the Salt Lot and 2nd Avenue and to construct the OH-007 combined sewer overflow detention tank but I am firmly requesting that during this ULURP process, the City commits to 1) minimize negative impacts to existing uses, 2) provide needed support for relocation, and 3) produce a final site design that integrates displaced site components and programs, as well as additional community benefits and ecosystem improvements.

I’m writing today because I have a very personal experience with the Salt Lot, and I want to support this site in the same way it has supported me. Over the past 8 years, the Salt Lot has served as a unique urban green space (particularly unique in it’s juxtaposition to industry) in which I’ve derived much inspiration and brought other artists and students through art workshops and events designed to engage people with the evolving landscape and to learn about the importance of urban ecology.
as well as other environmentally pressing issues. It is one of the only public greens spaces (aside from Whole Food’s canal side waterfront & Valentino park in Red Hook) in the whole Gowanus and Red Hook area. I’ve also participated in a great deal of horticulture programming at the Salt Lot and seen the hundreds of volunteers and students that come to the site to learn about the local landscape and its environmental challenges and use it as launching point for stewardship of plants and trees and the surrounding vicinity.

It is critical that the City works closely with the current site occupants: Gowanus Canal Conservancy (GCC), Big Reuse, and DSNY, as well as the 6 industrial businesses across 5th Street, to ensure construction impacts are appropriately managed. DEP must develop and coordinate a reasonable timeline with all site occupants and provide support for relocation in the event that programming and site operations are disrupted.

The City must also allow for meaningful engagement on the long term site design with local stakeholders who have valuable insight and feedback regarding this process. In addition to GCC and Big Reuse, teachers, students, Green Team apprentices, volunteers, neighborhood stewards, and many others have personal experience with the Salt Lot site and deserve to have their voices heard.

The long term site design should incorporate the multiple improvements that GCC, Big Reuse, and DSNY have built and maintained on the Salt Lot, including a $2 million renovation, spurred by an initial $500,000 in funding from District 39 participatory budgeting. Some highlights include:

- 24/7 Residential food scrap drop-offs
• An estimated annual 150 tons of processed compost that enriches 50% of the tree pits and gardens throughout the Gowanus Watershed

• Landscape maintenance that provides green jobs and opportunities for 7 full time staff, 2 part-time staff, 7 youth staff, and an annual average of 750 volunteers

• A native plant nursery that grows and distributes over 4,000 native plants each year, with many planted in community gardens, public parks, tree beds, and schools throughout the Gowanus neighborhood

• An outdoor classroom that hosts over 500 local students annually in grades K-12 in community science and urban ecology programming

• Restoration areas including intertidal marsh, high marsh, maritime meadow, shrubland, emergent marsh rain gardens, and the 2nd Avenue street end garden, which cumulatively capture an estimated 32,300 gallons of stormwater per rain event

• Biodiversity documentation of over 1,000 observations including over 250 species of plants, birds, fish, invertebrates, and mammals

All of the above site benefits will likely be impacted, displaced, and/or destroyed due to the City’s plan, which is why effective collaboration and transparency is essential. With proper management, the relocation of displaced site components and programs, and investment in
additional community and ecosystem services, we believe the Salt Lot can continue to serve Gowanus for generations to come.

Thank you for your dedication to the CB6 community.

Sincerely,

Jessica Dalrymple
TO: City Planning Commission  
RE: Gowanus Canal CSO Facility - Owls Head (ULURP Numbers C200320MMK, C200321PSK, and C200319PCK)

My name is Katherine Thompson and I am Co-chair of the Friends of Bushwick Inlet Park located on the Greenpoint/Williamsburg waterfront. Today I am urgently advocating for the long-term investment and protection of the BK6 Salt Lot, home to GCC’s stewardship and education programs, the Lowlands Nursery, Big Reuse compost operations, over 250 species of plants and animals, six industrial businesses, and over 90 jobs.

While I am in full support this critical infrastructure for a cleaner Gowanus Canal, I am firmly requesting that during this ULURP process, the City commits to:

1. Effective and regular communication with site occupants  
2. Support for relocation for existing occupants  
3. A long-term design that keeps the Salt Lot the eco-industrial heart of Gowanus

With these three commitments in place, the Salt Lot has potential to serve both the community and the ecosystem for generations to come. Additional details can be found [here](#).

I’m sharing all of this with you today because I too have a very special relationship with the Salt Lot, and I want to support this site in the same way it has supported me: The Friends of Bushwick Inlet Park have worked with community volunteers to design, plant and refurbish the gardens at BIP. Since 2018 we have planted 4 new gardens with native species which support birds and pollinators. We hold regular weekly gardening events as well as multiple educational and stewardship programs throughout the year. Very importantly, we procure most of our native plants along with compost from the Lowlands Nursery. Our plants have been flourishing and we are proud to be supporting another organization which is actively working to replenish our open space with locally grown native plant that improve enhance the ecology and wildlife habitats in Brooklyn.

Thank you for your dedication to the Gowanus community and support for an eco-industrial future for the Salt Lot.

Sincerely,

Katherine Conkling Thompson  
Co-chair, Friends of Bushwick Inlet Park
June 24, 2021

TO: Community Board 6  
RE: Gowanus Canal CSO Facility - Owls Head (ULURP Numbers C200320MMK, C200321PSK, and C200319PCK)

My name is Bryan Simpson and I am volunteer with the Gowanus Canal Conservancy doing composting and community education at the 2nd Avenue DSNY BK6 Salt Lot. I am also a BK Community District 6 resident, living at 181 12th Street, Apt. 1F, Brooklyn, NY 11215 and other addresses for the past 7 years. Today I am advocating for the long-term investment and protection of the BK6 Salt Lot, a biodiverse oasis in Gowanus that provides an abundance of ecosystem and community benefits, including compost production, landscape maintenance, environmental education, youth workforce development, ecological restoration areas, and native plant nursery operations.

While I am in full support of the Superfund requirement for DEP to construct bulkheads along the Salt Lot and 2nd Avenue and to construct the OH-007 combined sewer overflow detention tank, I am firmly requesting that during this ULURP process, the City commits to 1) minimize negative impacts to existing uses, 2) provide needed support for relocation, and 3) produce a final site design that integrates displaced site components and programs, as well as additional community benefits and ecosystem improvements.

I’m writing you today because I too have a very personal experience with the Salt Lot, and I want to support this site in the same way it has supported me. The Salt Lot as it exists today has been a gathering place for the community, and the source of much needed community engagement and greenspace that is generally lacking in the district. I have found a sense of community connection, and greater purpose, through what the Salt Lot has offered me. It would be a terrible shame to not maintain the spirit of what the Salt Lot has been able to offer to me and the community.

It is critical that the City works closely with the current site occupants: The Gowanus Canal Conservancy (GCC), Big Reuse, and DSNY, as well as the 6 industrial businesses across 5th Street, to ensure construction impacts are appropriately managed. DEP must develop and coordinate a reasonable timeline with all site occupants and provide support for relocation in the event that programming, and site operations, are disrupted.

The City must also allow for meaningful engagement on the long-term site design with local stakeholders who have valuable insight and feedback regarding this process. In addition to GCC and Big Reuse, teachers, students, Green Team apprentices, volunteers, neighborhood stewards, and many others have personal experience with the Salt Lot site and deserve to have their voices heard. The ULURP process has historically not engaged the public enough in the decisions made by the community board, the Borough President’s office, the City Council, and the Mayor’s office. Continuing these practices will further disengage the community from the process, which strikes at the spirit of what ULURP, and community engagement, is meant to do
The long-term site design should incorporate the multiple improvements that GCC, Big Reuse, and DSNY have built and maintained on the Salt Lot, including a $2 million renovation, spurred by an initial $500,000 in funding from District 39 participatory budgeting. Some highlights include:

- 24/7 Residential food scrap drop-offs
- An estimated annual 150 tons of processed compost that enriches 50% of the tree pits and gardens throughout the Gowanus Watershed
- Landscape maintenance that provides green jobs and opportunities for 7 full time staff, 2 part-time staff, 7 youth staff, and an annual average of 750 volunteers
- A native plant nursery that grows and distributes over 4,000 native plants each year, with many planted in community gardens, public parks, tree beds, and schools throughout the Gowanus neighborhood
- An outdoor classroom that hosts over 500 local students annually in grades K-12 in community science and urban ecology programming
- Restoration areas including intertidal marsh, high marsh, maritime meadow, shrubland, emergent marsh rain gardens, and the 2nd Avenue street end garden, which cumulatively capture an estimated 32,300 gallons of stormwater per rain event
- Biodiversity documentation of over 1,000 observations including over 250 species of plants, birds, fish, invertebrates, and mammals

All of the above site benefits will likely be impacted, displaced, and/or destroyed due to the City’s plan, which is why effective collaboration and transparency is essential. With proper management, the relocation of displaced site components and programs, and investment in additional community and ecosystem services, we believe the Salt Lot can continue to serve Gowanus for generations to come.

Thank you for your dedication to the CB6 community.

Sincerely,
Bryan Simpson
181 12th Street, Apt. 1F, Brooklyn, NY 11215
To: New York City Planning Commission

I moved to the Carroll Gardens neighborhood in June of 2017 and volunteered with the Gowanus Canal Conservancy almost immediately, helping at their plant nursery. I am writing today in support of the GCC’s position on the proposed plans for the BK6 salt lot, located at 2 Second Avenue in Gowanus.

I fully support their request for clear communication with the current occupants of the salt lot, including Big Reuse, temporary relocation of all activities that take place there, and a permanent home for these activities on this site after the proposed improvements are completed.

I do not wish simply to reiterate the talking points that the GCC has submitted. Instead I would like to comment that I feel they have been too modest in their self-appraisal. They have gone far beyond their list of accomplishments; providing and maintaining numerous native plants and run-off mitigating infrastructure for a large swath of the surrounding neighborhoods, educating countless school children from all over the city and raising awareness of the natural world that exists closer than many of us realize in New York City.

When there is so much concern for ‘sustainability’ in planning, this seems to me to be low-hanging fruit. This site currently supports a thriving community that provides the kind of environmental services and infrastructure that we know we need to become a green, ‘sustainable’ city (waste reduction through composting, water and air purification through plant propagation and education through passive and active environmental programming).

Over more than a decade, the current occupants of the salt lot have created something of true value to the City of New York. I believe that it would be a huge loss if the City did not support and nurture it. It will be next to impossible to replace it, especially because the rezoning plan as it is currently written would leave the newly imagined Gowanus neighborhood very underserved for parkland. If allowed to continue its work, the GCC has much to contribute to improving the neighborhood’s environmental services, and even expanding them. I urge you to support the requests of the Gowanus Canal Conservancy wholeheartedly. Thank you,

Lisa Shufro  
20 2nd Street  
Brooklyn, NY
June 24, 2021

TO: Community Board 6

RE: Gowanus Canal CSO Facility - Owls Head (ULURP Numbers C200320MMK, C200321PSK, and C200319PCK)

My name is Peter Reich and I am a CAG member and long-time Gowanus Canal Conservancy supporter. Today I am advocating for continued investment and protection of the BK6 Salt Lot, a biodiverse oasis in Gowanus that provides an abundance of ecosystem and community benefits, including compost production, landscape maintenance, environmental education, youth workforce development, ecological restoration areas, and native plant nursery operations.

While I am in full support of the Superfund requirement for DEP to construct bulkheads along the Salt Lot and 2nd Avenue and to construct the OH-007 combined sewer overflow detention tank, I am firmly requesting that during this ULURP process, the City commits to

1) minimize negative impacts to existing uses,

2) provide needed support for relocation, and

3) produce a final site design that integrates displaced site components and programs, as well as additional community benefits and ecosystem improvements.

I’m writing today because I too have a very personal experience with the Salt Lot, and I want to support this site in the same way it has supported my volunteer work with the Gowanus Canal Conservancy on some truly memorable design projects over the years.

It is critical that the City works closely with the current site occupants: Gowanus Canal Conservancy (GCC), Big Reuse, and DSNY, as well as the 6 industrial businesses across 5th Street, to ensure construction impacts are appropriately managed. DEP must develop and coordinate a reasonable timeline with all site occupants and provide support for relocation in the event that programming and site operations are disrupted.

The City must also allow for meaningful engagement on the long term site design with local stakeholders who have valuable insight and feedback regarding this process. In addition to
GCC and Big Reuse, teachers, students, Green Team apprentices, volunteers, neighborhood stewards, and many others have personal experience with the Salt Lot site and deserve to have their voices heard.

The long term site design should incorporate the multiple improvements that GCC, Big Reuse, and DSNY have built and maintained on the Salt Lot, including a $2 million renovation, spurred by an initial $500,000 in funding from District 39 participatory budgeting. Some highlights include:

- 24/7 Residential food scrap drop-offs
- An estimated annual 150 tons of processed compost that enriches 50% of the tree pits and gardens throughout the Gowanus Watershed
- Landscape maintenance that provides green jobs and opportunities for 7 full time staff, 2 part-time staff, 7 youth staff, and an annual average of 750 volunteers
- A native plant nursery that grows and distributes over 4,000 native plants each year, with many planted in community gardens, public parks, tree beds, and schools throughout the Gowanus neighborhood
- An outdoor classroom that hosts over 500 local students annually in grades K-12 in community science and urban ecology programming
- Restoration areas including intertidal marsh, high marsh, maritime meadow, shrubland, emergent marsh rain gardens, and the 2nd Avenue street end garden, which cumulatively capture an estimated 32,300 gallons of stormwater per rain event
- Biodiversity documentation of over 1,000 observations including over 250 species of plants, birds, fish, invertebrates, and mammals

All of the above site benefits will likely be impacted, displaced, and/or destroyed due to the City’s plan, which is why effective collaboration and transparency is essential. With proper management, the relocation of displaced site components and programs, and investment in additional community and ecosystem services, we believe the Salt Lot can continue to serve Gowanus for generations to come.

Thank you for your dedication to the CB6 community.
Sincerely,

Peter Reich

280 Nevins St.

Brooklyn, NY 11217
June 24, 2021

TO: Community Board 6
RE: Gowanus Canal CSO Facility - Owls Head (ULURP Numbers C200320MMK, C200321PSK, and C200319PCK)

My name is Potter Palmer. I am a long-time resident of Brooklyn, a frequent visitor to the Gowanus Canal area, a canoer of the Canal, and a proud member of and contributor to the Gowanus Canal Conservancy. Today I am advocating for the long-term investment and protection of the BK6 Salt Lot, a biodiverse oasis in Gowanus that provides an abundance of ecosystem and community benefits, including compost production, landscape maintenance, environmental education, youth workforce development, ecological restoration areas, and native plant nursery operations.

While I am in full support of the Superfund requirement for DEP to construct bulkheads along the Salt Lot and 2nd Avenue and to construct the OH-007 combined sewer overflow detention tank, I am firmly requesting that during this ULURP process, the City commits to 1) minimize negative impacts to existing uses, 2) provide needed support for relocation, and 3) produce a final site design that integrates displaced site components and programs, as well as additional community benefits and ecosystem improvements.

I’m writing today because I too have a very personal experience with the Salt Lot, and I want to support this site in the same way it has supported me. That includes volunteering time and energy to the greening of the Canal and the education of myself and fellow neighbors about this extraordinary historical landscape and vibrant ecosystem. The Salt Lot, as conceived and implemented, has developed into an effective social portal allowing involvement in so much of what is important to create and grow in South Brooklyn. It draws people of all backgrounds and allows them to work together in various projects and modes, shoulder to shoulder, on things they commonly care about. And to experience together the beauty and wonder of the unique natural splendor of the Salt Lot. We need to preserve all of this.

It is critical that the City works closely with the current site occupants: Gowanus Canal Conservancy (GCC), Big Reuse, and DSNY, as well as the 6 industrial businesses across 5th Street, to ensure construction impacts are appropriately managed. DEP must develop and coordinate a reasonable timeline with all site occupants and provide support for relocation in the event that programming and site operations are disrupted.

The City must also allow for meaningful engagement on the long term site design with local stakeholders who have valuable insight and feedback regarding this process. In addition to GCC and Big Reuse, teachers, students, Green Team apprentices, volunteers, neighborhood stewards, and many others have personal experience with the Salt Lot site and deserve to have their voices heard.
The long term site design should incorporate the multiple improvements that GCC, Big Reuse, and DSNY have built and maintained on the Salt Lot, including a $2 million renovation, spurred by an initial $500,000 in funding from District 39 participatory budgeting. Some highlights include:

- 24/7 Residential food scrap drop-offs
- An estimated annual 150 tons of processed compost that enriches 50% of the tree pits and gardens throughout the Gowanus Watershed
- Landscape maintenance that provides green jobs and opportunities for 7 full time staff, 2 part-time staff, 7 youth staff, and an annual average of 750 volunteers
- A native plant nursery that grows and distributes over 4,000 native plants each year, with many planted in community gardens, public parks, tree beds, and schools throughout the Gowanus neighborhood
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- Restoration areas including intertidal marsh, high marsh, maritime meadow, shrubland, emergent marsh rain gardens, and the 2nd Avenue street end garden, which cumulatively capture an estimated 32,300 gallons of stormwater per rain event
- Biodiversity documentation of over 1,000 observations including over 250 species of plants, birds, fish, invertebrates, and mammals

All of the above site benefits will likely be impacted, displaced, and/or destroyed due to the City’s plan, which is why effective collaboration and transparency is essential. With proper management, the relocation of displaced site components and programs, and investment in additional community and ecosystem services, we believe the Salt Lot can continue to serve Gowanus for generations to come.

Thank you for your dedication to the CB6 community.

Sincerely,
Potter Palmer
428 16th St.
Brooklyn, NY 11215
June 24, 2021

TO: Community Board 6 Land Use Committee

RE: Gowanus Canal CSO Facility - Owls Head (ULURP #s C200320MMK, C200321PSK, and C200319PCK)

My name is Chris Heitmann and I am a CB6 resident and regular volunteer for both the Gowanus Canal Conservancy (GCC) and BIG Reuse at the Lowlands Nursery, Community Compost Facility, and on-site gardens at the BK6 Salt Lot. Today I am advocating for the long-term investment and protection of the Salt Lot site, a biodiverse oasis in Gowanus that provides an abundance of social and ecological benefits to both CB6 and to the city as a whole, including: environmental education and youth workforce development, compost production, landscape maintenance and ecological restoration areas, native plant nursery operations, and vibrant community gathering place.

While in full support of the Superfund requirement for DEP to construct bulkheads along the canal’s Salt Lot and 2nd Ave shoreline, and to construct the OH-007 combined sewer overflow (CSO) detention tank, I am firmly requesting that during this ULURP process, the City formally commit to:

1) Directly include GCC, Big Reuse, and DSNY, as long-term and future tenants, in the planning process;
2) Minimize negative impacts to all existing uses of the site throughout the construction process;
3) Provide needed support for relocation of all uses during construction; and
4) Produce a collaborative final site design that integrates all current site components, users, and programs, as well as additional community benefits and ecosystem improvements.

The Salt Lot site – and GCC’s and Big Reuse’s on-site staff and programs – function not just as an ecological oasis, but as a vibrant social nexus that links a deep level of care and commitment to the neighborhood with the (quite beautiful) nuts-and-bolts operations of a climate-responsible city. This is a truly unique place in NYC – much more than “BK6 Salt Lot” connotes – and the planning process for its future must reflect the same care and consideration it has for the CB6 community. Having just moved (back) to New York in June 2020, mid-pandemic, working outside at the Salt Lot site – amidst piles of my neighbors’ food scraps, with the magical compost that results, and in the dirt of past, present and future Brooklyn – this place has helped me deeply re-connect with the city in a tangible, even visceral way. My sense is it has done the same for many others and has the potential to do so for many more in the future.

It is thus critical that the City work closely with the current site occupants – GCC, Big Reuse, and DSNY – as well as the six (6) industrial businesses across 5th Street, to ensure construction impacts are appropriately managed. DEP must develop and coordinate a reasonable and agreed upon timeline with all site occupants and provide support for relocation in the event that programming and site operations are disrupted.

The City must also allow for meaningful engagement on the long-term site design with local stakeholders, all of whom have valuable insight and feedback regarding this process. In addition to GCC and Big Reuse, teachers, students, Green Team apprentices, volunteers, neighborhood stewards, and many others have personal experience with the Salt Lot site and deserve to have their voices heard and ideas taken into account. The long-term site design should incorporate the multiple improvements that GCC, Big Reuse, and DSNY have built and maintained on the Salt Lot, including a $2 million renovation, spurred by an initial $500,000 in funding from District 39 participatory budgeting. These improvements and benefits include:

- 24/7 residential food scrap drop-offs;
- An estimated annual 150 tons of processed compost that enriches 50% of the tree pits and gardens throughout the Gowanus Watershed;
- Landscape maintenance that provides green jobs and opportunities for 7 full time staff, 2 part-time staff, 7 youth staff, and an annual average of 750 volunteers;
- A native plant nursery that grows and distributes over 4,000 native plants each year, with many planted in community gardens, public parks, tree beds, and schools throughout the Gowanus neighborhood;
- An outdoor classroom that hosts over 500 local students annually in grades K-12 in community science and urban ecology programming;
- Restoration areas including intertidal marsh, high marsh, maritime meadow, shrubland, emergent marsh rain gardens, and the 2nd Ave. street-end garden, which cumulatively capture an estimated 32,300 gallons of stormwater per rain event;
- Biodiversity documentation of over 1,000 observations including over 250 species of plants, birds, fish, invertebrates, and mammals.

This place and all of the above benefits will be negatively impacted, displaced, and/or destroyed due to the City’s current plan, which is why effective collaboration and transparency is essential. With the right process, proper management, the relocation of displaced site components and programs, and dedicated investment in additional community and ecosystem services, we believe the Salt Lot site can continue to serve Gowanus and the City as a whole for generations to come.

Thank you for your tireless work on behalf of the CB6 community.

Sincerely,

Chris Heitmann
290 Garfield Pl, #2
Brooklyn, NY 11215
chris.heitmann77@gmail.com
917-902-5089