June 24, 2021

TO: Community Board 6

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 required by the EPA as part of the Gowanus Canal Superfund and 2) the construction and operation of the OH-007 Combined Sewage Overflow (CSO) detention tank. As the 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 minimize negative impacts to existing uses, provide support for relocation, and produce a final site design that integrates displaced site components and programs, as well as additional community benefits and ecosystem improvements. Displaced site components and programs include compost production, landscape maintenance, a native plant nursery, environmental education, and biodiverse restoration areas. The 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.

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.¹

¹ 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
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 in the event we need to relocate our operations and programs for any period of time.

- **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. 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.

2. EXISTING CONDITIONS

![Salt Lot: Existing Conditions (Gowanus Canal Conservancy)](image)

**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

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2 CSO-GC-SFS DES Facility Plan Report - OH-007, September 2017, Section 7.5
renovation, spurred by an initial $500,000 in funding from District 39 participatory budgeting. Some highlights 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**: 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**: 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**: 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**: 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: 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.⁴ Visitors have access to these ecosystems along a pedestrian path that includes viewing areas, water access, and interpretive signage.

Existing restoration areas and gardens 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.⁴ 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 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.⁵ 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

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⁴ Compilation Of Codes, Rules And Regulations Of The State Of New York, 6 CRR-NY 661.4(hh) https://govt.westlaw.com/nycrr/Document/14ec4d445cd1711dda432a117e6e0f345?viewType=FullText&originContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

⁵ Ibid
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.\(^6\) Impacts to this biodiversity must be mitigated in the future site plan.

\(6\) 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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7 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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8 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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10 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, and the dedication of Community Board 6 in advocating for a resilient and vibrant neighborhood for all.

Sincerely,

Andrea Parker
Executive Director
Gowanus Canal Conservancy

Salt Lot: Vision (Gowanus Canal Conservancy and SCAPE)