

# Brooklyn Community Board #1 Response to USACE NYNJHATS Storm Risk Management Draft Plan

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**Introduction**


Based on a United State Army Corps of Engineers (USACE) presentation to Brooklyn Community Board #1 Environmental Protection Committee on November 29, 2022 (isolated slides below), the ensuing discussion and input received from committee and board members and the general public attending a Environmental Protection Committee hearing about the plan on January 4th, 2023, this community board submits to the USACE a response to its NYNJHATS Storm Risk Management Draft Plan (SRMP).




**U.S. ARMY**

## TENTATIVELY SELECTED PLAN FEATURES IN DETAIL

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**Newtown Creek Area**



**Storm surge barrier with shoreline based tie-ins**

Newtown Creek Storm Surge Barrier

- 130 ft. wide Sector Gate
- 17 foot crest elevation (NAVD88) for currently selected design storm event

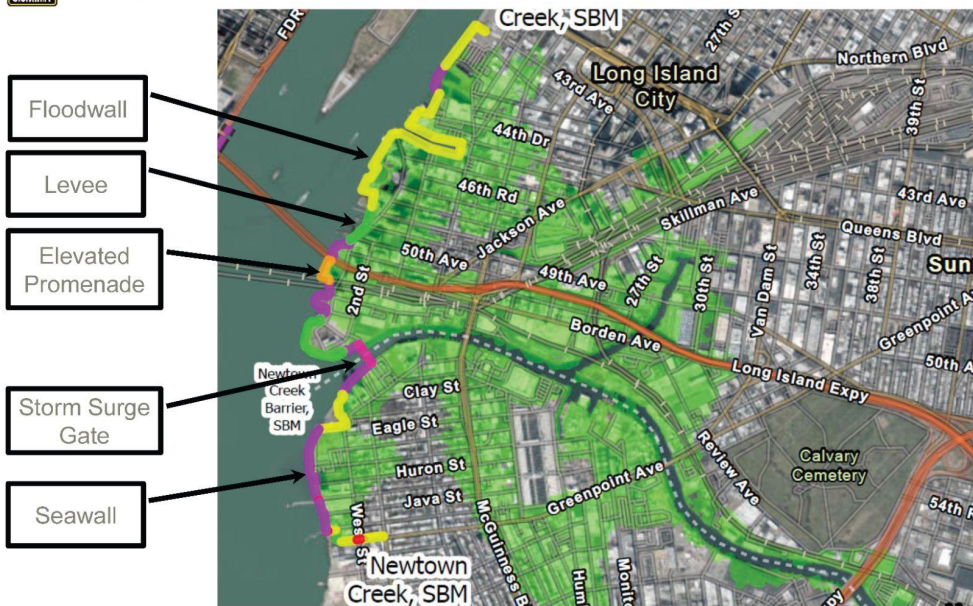
- Shoreline-based Tie-ins
- 15,000+ ft. of measures including floodwalls, levees, pedestrian & vehicle gates, elevated promenades, and seawalls

- Other considerations:
  - May need extension of NYCDEP Wastewater Treatment Plant discharge to outside Storm Surge Barrier
  - Known contamination issues



## NEWTOWN CREEK STORM SURGE BARRIER AND SHORELINE BASED TIE-IN DETAILS

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### Statement on Comment Deadline

*We must state upfront that the amount of time the USACE has provided to the public to respond to its planning around the critical issue of future increased storm surges is not adequate. The online documentation is massive and daunting. While the two-month extension was quite helpful, there still remains little time for volunteer community board members to pour through and absorb the incredible amount of data the USACE has published, do proper research on the subject, and fully reach out to community members to gather and submit comments. In true fairness the comment period should be extended for an additional 12 months.*

#### I. **Summary of USACE Plan, Generally and Specific to Newtown Creek and its Environs**

It is acknowledged that USACE, after years of researching the impacts of Hurricane Sandy on the New York and New Jersey Harbor and Tributaries Study (HATS) region, formulating worst case impact and damage scenarios for future 100-year storms taking into consideration accelerating predictions for sea level rise for the region, and creating an Environmental Impact Statement in the draft plan estimating environmental consequences for a matrix of environmental categories, and creating a cost-benefit-lifespan-construction analysis of 5 Alternatives (versus no action). USACE is favoring Alternative 3B as the preferred plan. Out of the 5 proposed alternatives, 3B falls roughly in the middle in terms of cost, benefit and lifespan. In contrast to alternatives

2 and 3A that include large infrastructure installations across the entrance to New York Harbor and little or no infrastructure installation north of the harbor entrance, 3B instead exclusively focuses on installation of flood protection infrastructure north of the harbor in multiple target areas. Furthermore, while alternatives 2 and 3A offer roughly 94% and 76% protection respectively, alternative 3B offers only roughly 63% protection. However, alternatives 2 and 3A are estimated to have total costs of \$150M and \$95M respectively while alternative 3B has a significantly smaller estimated cost of \$76M. Alternative 3B also is estimated to have a longer lifespan and shorter construction duration in comparison to the two other plans. Alternatives 4 and 5 are estimated to offer significantly less protection while being significantly less costly than the other 3 alternatives. The life span of alternative 3B infrastructure noted per USACE policy for the purposes of economic evaluation is 50 years, but has a planning horizon of 100 years. Alternatives 2 and 3A offer shorter life spans, 32 and 40 years respectively.

Though this Newtown Creek segment of Alternative 3B covers areas in both Queens Community District #2 and Brooklyn Community District #1, Brooklyn Community Board #1 will address only the areas that fall inside our district (Brooklyn Community District #1). It is acknowledged that the design of alternative 3B includes installation of a storm surge gate spanning 400 feet across the mouth of Newtown Creek with a 130' passage, aligned approximately with Box Street in Greenpoint. This gate will rise 20' in the water from the river bed to the water surface and 17' above the water surface, both at crest elevation. It will remain partially open during normal times and seal shut during storm surge events. The Newtown Creek segment will also include tie-in infrastructure along both shorelines of the creek spanning the East River northward in Long Island City, Queens and southward in Greenpoint, Brooklyn. Starting approximately from the western edge of 65 Commercial Street (currently an MTA vehicle lot and future Box Street Park) on the Greenpoint side of the creek, the tie-in structures will span west along the creek shoreline and subsequently south along the East River shoreline to Kent Street. This infrastructure will traverse inland through Newtown Barge Park and WNYC Transmitter Park and along portions of Dupont Street, Kent Street and Greenpoint Avenue. The tie-in infrastructure will utilize a combination of seawalls, floodwalls and levees with some sections extending as tall as 17'. USACE estimates that implementing Alternative 3B in this manner will offer almost complete flood protection from Newtown Creek during predicted future 100-year storm surges. *It is also noted that sections of Greenpoint and Williamsburg that suffered significant flooding during Hurricane Sandy, such as Bushwick Inlet, McCarren Park and Wallabout Channel, and which are predicted to experience increased severe flooding during future storms, are not protected under Alternative 3B.*

## II. Newtown Creek

### A. History and Characterization

For approximately 200 years [Newtown Creek](#) has served as a vital shipping canal supporting major manufacturing and commercial activity. Its banks were inundated with heavy industry that included oil refineries, manufactured gas plants, smelting operations, metal foundries, chemical plants, glue factories, and

animal rendering plants. Today the creek is surrounded by industries such as major oil storage facilities, metal recycling operations, natural gas operations, asphalt and concrete plants, and one of the largest wastewater treatment facilities in the United States (Newtown Creek Wastewater Treatment Plant). It has also dubiously served as a major recipient of raw sewage during olden days and to this day as the creek is the target of 13 Combined Sewer Overflow outfalls which during rainfall events dump 1.161 million gallons of sewage per year as noted in the NYC Department of Environmental Protection [CSO Long Term Control Plan 2017](#) (LTCP) into this waterway on an annual basis. As a result of these [historical uses and abuses](#), in 2010 Newtown Creek was [designated a Superfund project](#) by the Environmental Protection Agency. Additionally, due to the extensive legacy of chemical contamination as a result of these local heavy consequential uses, and the long duration of sewage outflow, New York City has yet to comply with the 1972 federal Clean Water Act. And to add insult to injury, along the creek in eastern Greenpoint exists the [Greenpoint Oil Spill](#) (the largest terrestrial spill in the U.S. 17-30M gallons) and the [Meeker Ave Plume](#) Superfund site (laden with chlorinated solvent contamination). These long-standing perpetual toxic circumstances have made the creek one of the most polluted waterways in the United States. During storm surge events, land adjacent to the creek, and connecting areas, flood extensively along its almost 4-mile extent, especially near its most polluted branches at the front.

**B. Plan Review and Analysis in Regard to Newtown Creek**

*As expressed by community board committee members and the general public, it is imperative that residents and businesses be protected from interacting with Newtown Creek floodwaters, who at face value embrace the estimation that the storm surge gate proposed for the creek through Alternative 3B will protect the neighborhood from flooding contaminated creek water during a 100-year storm event.*

**Concerns and Recommendations:**

**1. Inhibited Tidal Flow**

Tidal flow works to clean the creek water, especially during rain events when the 13 CSO outfalls are discharging over a billion gallons of sewage into the creek annually. We are deeply concerned that the gate, *both*, in its closed or (partially) open state will inhibit this process.

**2. Undermining the Long Term Control Plan**

New York City's Long Term Control Plan to reduce sewage pollution in the creek is deeply necessary for its compliance with the federal Clean Water Act (which it has failed to do since the Act's enactment in 1972). The City's plan, which was approved by the New York State Department of Environmental Conservation, will include constructing sewage retention tunnels to divert and hold sewage during rain events. In conjunction with other facets this plan is estimated to reduce sewage in the creek by

approximately 60%. We are concerned the gate in both positions could inhibit the functioning of these measures. Conversely, the *USACE could create additional infrastructure* to retain additional sewage during rain events to increase the sewage reduction percentage to well beyond 60%, a figure that the community finds grossly inadequate. Under the LTCP, over 464 millions gallons of sewage would still be discharged into the creek during rain events. Since the USACE has noted that adequate drainage must be designed into this plan, enhancing the LTCP remedy could serve dual purposes.

3. **Contradicting the Superfund Contamination Remediation & Recontamination Concerns.**

We are concerned about the gate interfering with the federal Superfund remediation process and its potential to cause recontamination. The superfund investigation process has already taken over 10 years, and the feasibility study, risk assessment, remedy design, Record of Decision and the remediation itself will take decades more. It would be catastrophic if this remediation project was damaged by the construction and operation of the proposed storm surge gate. The risk management plan must be designed in concert with the EPA and the community watchdog entity, the Newtown Creek Advisory Group to achieve the best and safest outcome for the remediation and storm risk management, *and* consider alternative designs for the latter.

4. **Negative Impact on Shipping Navigation**

The plan draft estimates there to be shipping delays due to surge barrier closures. Oil, garbage and sludge are just a few of the essential items that move in and out of the creek on a regular basis. The barrier would impact the vessels from shipping out sludge and other essential shipping, as well as HAZMAT emergency access that may affect the creek considering its highly contaminated state and industries existing along the creek working with noxious substances and products.

5. **Seek An Alternative To The Proposed Storm Surge Gate Design**

Sealing off two-thirds of the creek permanently will have severe negative consequences for the natural cleaning process the river and creek tidal action provide. This process is a key supporting element of the Long Term Control Plan. It would be much more preferable to deploy vertical lift gates instead of a narrow horizontal moving structure connected to sealed barriers, or measures with similar flexibility, that would allow much more profuse tidal flow. See rising sector gates used with [The Thames Barrier](#) which protects Central London in the United Kingdom from storm surges by utilizing raisable gates. In its open state, it will allow vessel navigation *and* promote almost complete uninhibited tidal flow. *Brooklyn Community Board #1 urges USACE to explore and consider alternatives to a structure that will not disrupt the tidal flow of Newtown Creek and prevent the potential negative consequences of utilizing a horizontal gate and solid*

barriers.

### III. The Greenpoint Waterfront

#### A. History and Analysis

In 2005 New York City [rezoned](#) almost 200 blocks in the Greenpoint and Williamsburg sections of Brooklyn along its waterfront. This massive land use action enabled properties previously zoned for heavy manufacturing to be developed into high density mixed-use residential buildings. This rezoning and subsequent ones passed as recently as 2021 have ushered in a dramatic growth in housing units and population to this area. A [NYC Department of City Planning report, Net Change in Housing Units, 2010-2020](#), showed Greenpoint-Williamsburg creating around 21,000 new housing units from 2010-2020, the most of any area in the city. This building boom has continued until the current day, with thousands of new units under construction or planned. Where the northwest Greenpoint shoreline aligns with the proposed Newtown Creek tie-in structures, 8,003 new housing units have been constructed or are being constructed which will result in approximately 18,500 new residents. In the Environmental Impact Statement created for this rezoning, the [Open Space section](#) (Chapter 5) details the incredible deficient amount of open space that existed prior to the rezoning and the very modest improvement of this amount as a result of the rezoning action. The City's open space ratio back then was 1.5 acres of open space per 1,000 people, far less than the 2.5 acre goal that it has set for its neighborhoods. In the Greenpoint-Williamsburg rezoning area, the ratio was a dismal .6 acres per 1,000 people. Realizing that the rezoning would greatly exacerbate this deficit, the City committed to creating approximately 40 acres of new open space to help mitigate the enormous impact of the rezoning in terms of a vast increase in population and building density. [Comprising the 40 acres](#) would be 2 new waterfront parks (Bushwick Inlet Park and Box Street Park), the renovation and expansion of another (Newtown Barge Park) and the creation of a connecting 2-mile waterfront esplanade which would be a requirement of waterfront property owners to develop along with creating new high density residential buildings. 1.6 acre WNYC Transmitter Park would be separately proposed and developed on the Greenpoint waterfront (opened in 2012) in concert with the rezoning commitments and be factored into the EIS. The open space action was the *only part of the rezoning proposal that was approved by Brooklyn Community Board #1. Safe and direct public access to the waterfront has been a long standing drive from the North Brooklyn community. Previously private industry, dilapidated piers and bulkheads and fences inhibited safe and direct access to the neighborhood's waterfront.* This was expressed by the community at our meetings and hearings in addressing the SRMP. It has been scientifically documented how access to open space provides physical and psychological benefits.

Therefore, as expressed strongly by board members and the general public, *it is*

*imperative that waterfront and open space access to the East River shoreline be preserved as we strive to protect the area from future severe storm events and flooding.*

**B. Plan Review and Analysis in Regard to the Greenpoint Waterfront**

As expressed by community board committee members and the general public, it is imperative that residents and businesses be protected from interacting with Newtown Creek floodwaters, who at face value embrace the estimation that the storm surge gate proposed for the creek will protect the neighborhood from flooding highly contaminated creek water during a future 100-year storm event. Furthermore, these same voices understand the devastation East River flooding inflicted on Greenpoint and Williamsburg during Hurricane Sandy, and that future 100-year storms are predicted to produce increased devastation, and managing this risk along this waterfront is paramount. A large sentiment expressed at our committee meetings was shock and awe in reaction to the tie-in infrastructure proposed in Alternative 3B that includes seawalls, floodwalls and levees. Some of this infrastructure will rise 17' above ground and wall off the entire existing, under construction and planned Waterfront Public Access Areas from Box Street to Kent Street and 11 waterfront street ends, cutting through two recently created public waterfront parks and traversing down 4 blocks of street.

**Concerns and Recommendations:**

**1. Infrastructure Design**

Shock and awe have been the dominant sentiments in reaction to the sea wall example rendering of a wall on the Huron Street end at the East River (see Appendix figure 1). As expressed in Greenpoint Waterfront History section above, obtaining public waterfront access has been a momentous and very just goal that was achieved through a long arduous land use process. *Consider measures to reduce wall height, reduce wall deployment and or eliminate this feature all together.* Utilizing hybrid infrastructure such as [Living Breakwaters](#) in the river the entire footprint span of the planned seawall to calm surges and offer a layer of protection. Consider allowing waterfront properties/parks/esplanades to flood. Seek inspiration from the new (see Appendix figure 8) [FiDi & Seaport Climate Resilience Plan!](#) If reduced-size seawalls and/or floodwalls are still deployed, consider design inspiration from BIG's East River [floodwall concept](#) (see Appendix figure 6) created for the [East Side Coastal Resiliency Project](#). Consider alternative wall locations. Community residents spoke strongly about nature-based solutions as well as managed retreat.

**2. Designs for Alternative 3B seems to contradict or be out of sync with current conditions on the ground within the tie-infrastructure target areas:**



a) **Privately-owned waterfront developments.**

Based on recent New York City waterfront resiliency zoning rules changes, all of the private waterfront developments from Bell Slip to Kent Street must raise their land between their waterfront public access areas and their buildings to an elevation of 12.5' above grade. All of the private development projects from 1 Bell Slip south to 1 Java Street have designed their properties with these specifications. The Greenpoint Landing waterfront development, which has constructed 6 residential buildings between Bell Slip and Newtown Barge Park and 2 buildings between Dupont Street and Eagle street (with 4 more planned for south of this block), elevates their waterfront space from the water's edge to around 17'. Waterfront properties south of Green Street have lower elevations at round 12.5'-13'. Therefore it seems quite unnecessary to construct a 17' high seawall along the shoreline spanning these properties. USACE should work with the local community and affected developers to *devise alternative adaptations* of these properties and street ends to achieve necessary but less severe protections at these locations, or even consider no tie-infrastructure *or much softer less severe elements*, either onland, in water and/or both. Utilizing a layered approach for protection could potentially work here such as including a concept like that of the [Living Breakwaters](#) project being constructed off the shore of Staten Island in the harbor, spanning a man-made reef(s) that will evolve into a full cover of marine life, from unprotected Bushwick Inlet (& Park) to Dupont Street. Or again, look at the [Fidi & Seaport Coastal Resiliency Plan](#).

b) **USACE Land Elevation Data Seems Dated and Out of Sync with Current Onsite Conditions.**

The USACE should confer with New York City agencies to ensure they are designing a plan with current accurate data, with respect to rezoning resilience rules for waterfront developments and parks, taking note of the waterfront elevations noted above in subsection 'a'. *The board strongly urges USACE to obtain this information from New York City agencies: City Planning, Environmental Protection, Parks and Recreation and Buildings, and any other relevant agency, as well as the owners and developers of properties within the target area.*

c) **Is USACE Using Newtown Barge Park's Current Design & Land Elevation Specs?**

Newtown Barge Park was specifically redesigned for storm surge resiliency and reopened in 2019. A 12.5' high berm was constructed between the turf field and the waterfront esplanade that serves as a flood mitigator. USACE should take into

consideration the current conditions in this park and modify and reduce the scope of the infrastructure planned in this location. Consider an element(s) that is much less severe and large than a floodwall. Our long sought-after park with waterfront access and views should have its essence preserved. Additionally, there is an emergency sludge loading dock at Newtown Barge Park that must be taken into consideration.

d) **Is USACE Using Accurate Land Elevation Data for WNYC Transmitter Park?**

(see the attached letter from Friends of Transmitter Park)  
WNYC Transmitter Park, another cherished open space oasis on the waterfront has existing conditions that USACE must consider in informing their plan design. The private property adjacent to the eastern border of the park built a 160' wide 8' high concrete separation wall (see Appendix figure 2) between their property and the park. Google Earth notes the elevation of the park along this span between 12' and 13" feet. USACE should consider the water's edge of the park has an elevation of 4' that gradually slopes up to 12'-13' feet in the eastern one-third of the park, and there exists a 8' high border wall at this peak elevation creating 20+' of flood protection.

e) **Planned Greenpoint Avenue Floodwall Will Block a Parking Ramp & Retail Businesses on the Blocks Affected, and Traverse a Hill**

(See Appendix figures 3-6) USACE Alternative 3B proposes constructing a floodwall along two blocks of the northern side of Greenpoint Avenue connecting from WNYC Transmitter Park at the street's terminus up to Franklin Street. Current on the ground conditions must be taken into consideration. The north side of the block of Greenpoint Ave from the park to West Street consists of an active driveway ramp to a 11-story apartment building (13 Greenpoint Avenue/30 Kent Street, see the attached letter from the owner of this property) and seven row house buildings with existing or planned retail on the street level. It seems completely untenable to place an above-10' floodwall in front of these elements. Second, there is a street intersection at the convergence of Greenpoint Ave and West Street. A floodwall traversing this intersection of streets and sidewalks seems incredibly problematic.

Lastly, the section of Greenpoint Ave between West Street and Franklin Street is an incline rising from 15' to 20' (west to east). Placing a floodwall in this location seems unnecessary.

Additionally the north side of the street contains a landmarked historic 10-story building, the Eberhard Faber Pencil Factory. Walling this structure off is untenable.

### **3. A Problem With Equity**

If the Waterfront Public Access Areas along the East River, and the corresponding street ends are walled off, the local community and general public will be denied access to the waterfront they have long sought after for decades. However, market rate apartment residents living in the upper floors of waterfront towers will still have that visual access to the river and beyond. This presents a severe equity issue. Public parks and waterfronts work as the “great equalizers.” Seawalls will remove this function from the public realm in our district.

### **4. Additional Challenges with local waterfront conditions**

There are **two very active waterfront piers** located along the East River in Greenpoint. At India Street this pier serves as a terminal for NYC Ferry. At Kent Street a pier extends out from WNYC Transmitter Park. It’s a very popular amenity. How will the seawalls be designed to not oppress access to these piers and well being enjoyed by commuters and park goers. These piers are prime city destinations for residents and tourists and lend themselves to the hard achieved goal of waterfront access for all people. From Newtown Bark Park south to WNYC Transmitter Park there are *5 active Combined Sewer Overflow outfalls*, and more that actively discharge along the river south of that park. How will the seawalls be adapted to prevent sewage backup during rain events, and during cloudburst events?

## **IV. Unprotected Areas**

### **A. South Greenpoint Shoreline, Bushwick Inlet & McCarren Park**

During Hurricane Sandy, the upland areas in Greenpoint (south of Kent Street) and Williamsburg connected to the East River and Bushwick Inlet experienced extensive flooding devastating homes and businesses. Subsequently, USACE maps and NYC flood hazard maps estimate increased flooding in these areas due to future 100-year and 500-year storm induced surges over the course of the 21st Century. *Alternative 3B leaves this area unprotected.* At our committee meeting and hearing residents of this area expressed a dire need for the USACE and its state and city partners to address the vulnerability here. Two-thirds of Bushwick Inlet Park, a waterfront public space promised to the North Brooklyn community bordering the East River and encompassing Bushwick Inlet, remains undeveloped. This could be an incredible opportunity to create a significant nature-based defense against future storm surges, one that could be less costly than man-made structures and serve the original core purpose of providing long-promised open space to city residents in a unique and engaging way.

Beyond storm surge mitigation the park could also be designed to mitigate cloudburst events and promote biodiversity. While the north and south shorelines of Bushwick Inlet can be and have been designed with land elevation as the park is developed, the thin strip of land between the eastern edge of the inlet and Franklin Street will rise only to 9' high. The USACE and its partners should consider hybrid migration measures at the East River's mouth of the inlet. Staten Island's Living Breakwaters project could be a concept to consider or to seed other ideas.

On its property located at 40 Quay Street in Greenpoint, which borders the northern bank of Bushwick Inlet, the Metropolitan Transit Authority (MTA) has hired a private developer to upzone their property to create a large-scale mixed use building on this spot. One of the prime challenges to devising a protective remedy for the Greenpoint shoreline is a deep lack of real estate to enable less severe mitigation measures. Private Greenpoint waterfront developers have developed massive hardscape structures less than 100' from the water's edge making protection measure design more complicated for those developers, the community, USACE and its partners. Rather than commit the same mistake on the 40 Quay Street property, the MTA and New York State should redevelop the property into a public green space where nature-based measures can be designed and deployed in force, and while also helping decrease the open space deficit for this neighborhood whose population density continues to increase immensely.

## **B. Greenpoint Historic District**

The HAT report and EIS states "This alternative has the potential for adverse effects to historic properties within the Gateway National Recreation Area, the Pelham Bay Park Historic District, **the Greenpoint Historic District** (emphasis added), the Gowanus Canal Historic District and other historic properties. Alternative 3B is likely to have aesthetic impacts associated with a changed viewscape and some coastal views may be impacted, diminished, or lost due to the construction of this alternative."

In 1982 New York City designated approximately 10 blocks in Greenpoint, Brooklyn (roughly bordered by Kent Street, Greenpoint Avenue, Calyer Street and Franklin Street) as the [Greenpoint Historic District](#). This designation recognizes and serves to protect rows of magnificent townhouses and mixed-use buildings constructed in the mid to late 1800's, many built with "brownstone" facades and existing as wonderful examples of Italianate architecture. It is an area rich with beauty and history, and is a part of Greenpoint's DNA. [New York City flood hazard maps](#) show future storm surge flooding threats ranging from encroachment of the district's edge to the area's full inundation.

Greenpoint's waterfront encompasses centuries of rich New York City and

American history as it was a prime ship building district for 150 years designing and creating famous vessels such as the USS Monitor and the Grand Republic. Many of the historic buildings that supported the shipping industry from the day still stand supporting a rich historical fabric. Walling off this history would be devastating to the local community and historians. Let's think outside of the box with alternative flood protection measures that can best preserve our local fabric as well.

**C. Wallabout Channel & Environmental Justice Areas within Brooklyn Community District #1**

Bordering Williamsburg's Southside waterfront from Broadway to Washington Avenue in the Brooklyn Navy yard, Wallabout Channel was a major flood source during Hurricane Sandy and is estimated to produce much more extensive flooding during future storms. This flooding will affect upland sections within [Environmental Justice Areas](#) (zip code 11211) saddling Flushing Avenue. Annual wastewater outfall from channel-located CSO's #NC-014 (*the largest in the entire city*) and NC-013 amounts to approximately 550 millions gallons annually. Therefore, residents of this area will be subjected to an existential threat of incredibly polluted floodwater. The USACE and its non-federal partners must address this area not currently covered under Alternative 3B.

**V. Additional Concerns**

**A. Induced Flooding Risk**

Both board committee members and attendees during a Environmental Protection Committee hearing on January 4, 2023 expressed deep concern about induced flooding from Newtown Creek during an event when the storm surge gate is closed and preventing creek outflow into the East River. Participants suggested reworking/redesigning Newtown Creek shorelines and bulkheads, and especially street ends that meet the creek. Newtown Creek Alliance has released a [vision plan](#) that reimagines these elements of the creek emphasizing nature based revisions and that support human interaction with the waterway and enhancing habits that would bolster the creek ecosystem. Participants often mentioned converting waterfront street ends into public open green spaces designed to calm and mitigate induced flooding and cloudburst events, expressing a desire to return towards naturalism to protect our shoreline and its communities. An additional concern strongly expressed in a worst case scenario with a severe seawall installation along the East River, is induced flooding along the East River shoreline south of Kent Street in Greenpoint. Furthermore, there is major concern of induced flooding behind seawalls during cloudburst events.

**B. Groundwater**

The NYNJHAT feasibility study does not discuss groundwater as it pertains to local Superfund sites and other contamination prevalent in the North Brooklyn waterfront community. As has been [reported lately](#), monitoring of groundwater

has been dormant for a long duration while flooding from this source has increased as documented and vocalized by locals at our meetings. In this respect planning for future storm events and flooding is way behind the curve. Therefore, there are concerns about how redirecting flood water will affect contaminated groundwater and underground toxic plume movement, and there is cause for concern about human exposure to those toxins. It is of particular concern in Greenpoint and Williamsburg where decades of industrial uses have given way to residential uses. Over the last two decades the Community Board has received (and continues to receive) almost a dozen brownfield cleanup program applications annually, most involving remediation of groundwater contaminated with volatile and semivolatile organic compounds, including a highly contaminated [state superfund site](#) located on a former plastics factory property in Greenpoint. As sea levels rise, so do groundwater levels.

### **C. Cloudburst event flooding**

There are concerns that cloudburst event flooding is being overlooked with Alternative 3B. [New York City's Stormwater Flood Model maps](#) detail what residents are reporting to the community board and beyond on a regular basis. During cloudburst events specific areas in the district are experiencing major flooding, especially in streets, sidewalks and basements. These are areas that also flood during storm surge events, therefore potentially incurring two major sources of water inundation, and an additional one from swelling groundwater. This includes sections of McGuinness Blvd between Newtown Creek and Greenpoint Avenue, Greenpoint Ave adjacent to the Newtown Creek Wastewater Treatment Plant, Humboldt Street north of Nassau Avenue, streets connecting northeast from Bushwick Inlet, Kent Avenue along Wallabout Channel, and Environmental Justice Areas along Flushing Ave east from Wallabout Channel and north of that street and Nostrand Ave. A major intervention is warranted here by USACE and its partners. More maintenance related issues such as developing a scheduled catch basin sweeping and cleaning should also be addressed to help in the prevention of street and basement flooding. Also, underground stormwater infrastructure and other green infrastructure should be included in this planning to address overall rain and/or surge events.

## **VI. Establishment of a Local Working Group to Work With the USACE on the Local Plan Design**

Given the incredibly small window of time provided to communities by the USACE to respond to this massive plan, with enormous permanent consequences for neighborhoods including North Brooklyn, the representatives of Brooklyn Community District #1 who are members of this community board, call for the creation of a Community Advisory Group (CAG) or a community-board based Task Force to work directly with the USACE to methodically collaborate on the planning, designing and construction details of Alternative 3B or another alternative that might be selected, for the duration of the project. In Manhattan New York City created a [CAG](#) with the local community to work through the design and construction of the East Side Coastal

Resiliency Project. To work on the Newtown Creek Superfund site, the [Newtown Creek CAG](#) was created to forge a collaboration and communication between the local Brooklyn-Queens community, the Environmental Protection Agency and other entities. Both of these CAG's have functioned well to serve the communities and projects they are working on. These are good examples of a just method for the public and the government to meet the big climate-related challenges before us in creating a protective remedy.

## **VII. Summary & Conclusion**

Brooklyn Community Board #1 welcomes the opportunity to robustly address the incredible challenges that climate change is and will continue to present to our district. The draft plan presented by the USACE can act as a catalyst in attempting to meet these challenges. The board is grateful that Newtown Creek and its connecting areas have been targeted with a future 100-year storm surge risk management plan, given its horrible contaminated state, and the long desire for the local community to be protected from flooding. However, considering the significant land use and environmental history laid out in previous sections, the board strongly requests major reconsiderations and redesigns to Alternative 3B, related to the design of the storm surge gate and selection, design and deployment of tie-in infrastructure. Conceptual plans for both as presented to the board and the community at large will potentially cause more problems than they will resolve. They are simple and blunt. The board requests a remedy design with much more nuance and thinking outside of the box, or that is much more flexible and multi-layered. The board is deeply concerned about the USACE's calculation and design data not being composed of accurate current land elevations and design, especially with respect to waterfront developments and parks. It also is deeply concerned about the USACE lacking accurate awareness of topography and conditions on the streets such as existing building access and street level business, and hills. We request the USACE embrace critical concerns about Combined Sewer Overflow outfalls, induced flooding behind proposed infrastructure and down river, and parallel existential flood threats to waterfront areas not protected or covered by Alternative 3B, rising groundwater levels, cloudburst events, some of which affect Environmental Justice Areas in our district and just outside it. It is urgent that the USACE and its non-federal partners address all of these concerns when Alternative 3B is (re)planned and (re)designed. Doing otherwise seems incredibly short sighted and creates the potential for failure and inadequate preparation and defense against future increasing flooding, and in North Brooklyn specifically, with highly polluted water from multiple sources. We feel that to achieve the best chances for an optimal design outcome, is to do so with community-based design and communication. Brooklyn Community Board #1 requests the USACE create a Community Advisory Group with the neighborhood of North Brooklyn to work collaboratively, robustly and thoroughly through the design, planning and construction of Alternative 3B or another selected storm risk management plan. Over the last 100 years our community has overcome a myriad of environmental challenges. We are wholeheartedly ready to face this current challenge of storm surge risk and other

flooding threats together with the US Army Corps of Engineers and its non-federal partners.



# APPENDIX



Figure 1



*Figure 2 - Existing 8' high concrete border wall on the eastern border of WNYC Transmitter Park (ground elevation is 13').*



*Figure 3 - 13 Greenpoint Avenue restaurant space & apartment building parking ramp entrance (at Greenpoint Avenue street end adjacent to WNYC Transmitter Park).*



*Figure 4 - Greenpoint Avenue looking east from the street end adjacent to WNYC Transmitter Park, with street level businesses lining both sides of the street. Note the rise in elevation.*



*Figure 5 - Street level businesses and residential buildings on the northside of Greenpoint Ave between WNYC Transmitter Park and West Street.*



*Figure 6 - Greenpoint Avenue looking east from the intersection of West Street, with the protected historic landmark, the Pencil Factory (Eberhard Faber) Company building, on the far left. Note the rise in elevation.*



*Figure 8 - Rendering of a floodwall created for the East Side Coastal Resiliency Project (along the East River in Manhattan).*



Figure 9 - FiDi & Seaport Coastal Resiliency Plan rendering.