



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

February 22, 2019

Dear Members of the Gowanus Canal Community Advisory Group:

I am writing to thank you for sharing your thoughts and comments regarding the Gowanus Station building located at 234 Butler Street, which is the future site of a Combined Sewer Overflow (CSO) retention tank to be built by New York City as part of the Superfund cleanup of the Gowanus Canal. Also, thank you for sending your recent Resolution regarding the future of that building should a tunnel replace the tank. I deeply appreciate the passionate commitment of the Gowanus Canal Community Advisory Group (CAG) members to both this important cleanup project and to your community's historical and architectural heritage.

In carrying out our work under the Superfund law, the U.S. Environmental Protection Agency (EPA) is sensitive to the need to balance the demands of our cleanup efforts with historic preservation. Where, as in the case of the Gowanus Canal, there are potentially historic structures that will be affected by the implementation of the cleanup plan, EPA hires experts to advise and consult with us about how to mitigate the impacts of the remediation project, and we work closely with the state historic preservation office.

We understand that the Superfund process is made better with thoughtful community input. We therefore took the additional step of providing an extensive opportunity for public comment on our proposed decision about the Gowanus Station building.

We have now finalized our decision, which is memorialized in a Memorandum of Agreement (MOA) with the New York State Historic Preservation Officer (SHPO), available at:
<https://semspub.epa.gov/src/collection/02/SC38323>.

This agreement is an important step in our efforts to clean up the Gowanus Canal. As you know, the Gowanus Station building is located on property recently acquired by the New York City Department of Environmental Protection (DEP) for the construction of a CSO storage tank, a critically-important element of the Superfund cleanup of the Canal.

The CSO storage tank will be built underground, but it requires a substantial aboveground "headhouse" structure. Engineering considerations require that the headhouse occupy much of the space where the Gowanus Station building now stands, so preservation of that building in its entirety is not possible. EPA has, therefore, focused on opportunities for mitigation.

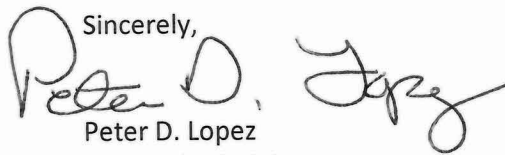
Under EPA's mitigation approach, DEP is being directed to carefully dismantle the Nevins Street façade and approximately 25-30 feet of the Butler Street façade of the Gowanus Station building. To the extent practicable, DEP would preserve materials of the building that can be salvaged, including the terra cotta sign panel, window pediments, stone sills, stone water table and bricks, for reuse in the reconstruction of the two facades. The reconstructed Nevins Street façade with the pediment and the reconstructed Butler Street façade will be incorporated into the future headhouse building. At the same time, we are also recommending that interpretive elements be provided along with the reconstructed portions of the 234 Butler Street building.

This agreement represents a good faith effort to balance the community's concern for its historic heritage and our obligations under the National Historic Preservation Act, with the Superfund goal of revitalizing one of the nation's most seriously-contaminated waterbodies. The agreement incorporates the Gowanus Station's historic features into the new CSO facility, enabling the cleanup of the Canal while respecting its long and rich history.

Please know that EPA deeply respects the history of the community and has taken its efforts to reach this decision very seriously. As you may know, the City's early conceptualization of the CSO retention tank buildout did not contemplate historic treatment of the 234 Butler Street structure, which could have resulted in the demolition of the building and the creation of a CSO tank headhouse structure that did not reflect the history of the area, including its architecture. We know that through the vetting process, the City has moved closer to the neighborhood's vision of preservation, with new design concepts and inclusion of community amenities.

At EPA we have worked to pay careful attention to, and have closely engaged with and listened to the public on this topic. EPA participated in a February 2018 CAG meeting that was also attended by SHPO and the City Landmarks Preservation Commission. EPA then sought public input on a draft MOA between EPA and SHPO in which EPA had proposed leaving the Nevins Street and a portion of the Butler Street façades intact in their present locations. After further consultation with DEP regarding building conditions and constructability, EPA modified its initial proposal, allowing DEP to dismantle and subsequently reconstruct and incorporate in the new building a similar length of the Nevins and Butler Street façades. The last step in finalizing the draft MOA between EPA and SHPO is a consultation with the Advisory Council on Historic Preservation in Washington, D.C., which is now underway.

Once again, I thank you for your dedication and commitment to the long-awaited cleanup of the Gowanus Canal, as well as the preservation of the historic heritage of this extraordinary community.

Sincerely,

Peter D. Lopez
Regional Administrator