



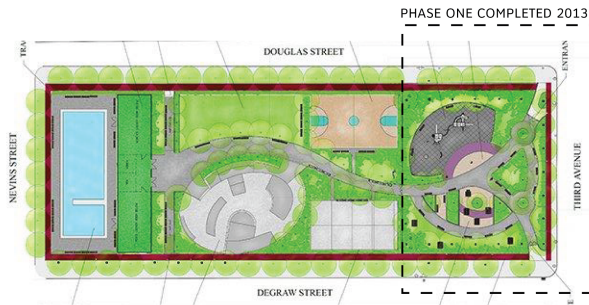
September 9, 2025

To: Michael Sivak, Environmental Protection Agency

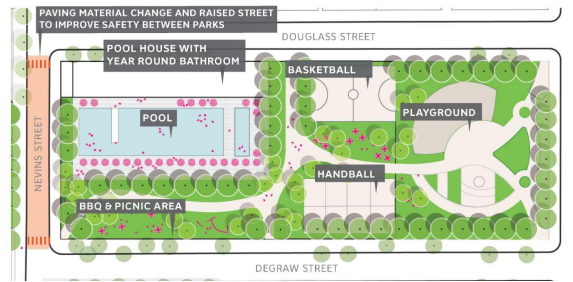
As the Friends of Thomas Greene Park (FoTGP), our mission is to work with the surrounding communities and organizations to revitalize Thomas Greene Park and to support ecological, recreational, educational and economic uses that increase the park's attractiveness as a destination while respecting the character of the surrounding areas. This work includes hosting events to bring neighbors to the park, stewardship activities to support the cleaning and greening of the park, and advocacy to ensure that the Park's value as the largest Gowanus neighborhood green space for cooling, recreation and community events is not only retained, but improved upon through the needed remediation.

Gowanus Canal Conservancy (GCC) works to build an equitable, thriving and resilient urban ecosystem in Gowanus — its waterway, urban forest, parks and open space — through education, stewardship, and advocacy that empower our community. Our work focuses on ensuring that existing and emerging neighborhood parks and public space are inclusive, thriving and well-maintained, including ensuring that Thomas Greene Park continues to support the growing community as a site of recreation, celebration, cooling and respite.

The park, though beloved by the community, has multiple challenges that require a comprehensive renovation. The "DD" swimming pool was built in 1970, and the facilities are sorely out of date. Key concerns in the park include regular flooding during rainstorms on the basketball courts, bathrooms that are only accessible to pool patrons when the pool is open during the summer recess, and a lack of connectivity and access between program areas. There were some cosmetic renovations in 1998 which included creating handball courts, but these remain underutilized because they are difficult to access. In 2008, FoTGP worked with Parks on a community based vision for the needed renovation, and Phase 1, on the eastern third of the park, was completed in 2013. However, as the Park site is part of the former Fulton Manufactured Gas Plant, the remaining renovation has been on hold in order to allow plans for remediation to commence, with the understanding that when the park is remediated, it would set the stage for needed renovations for the western two-thirds of the park, in accordance with EPA's [2017 Administrative Settlement](#).



2008 Renovation Diagram, NYC Parks



2019 Updated Vision with connection to Head End Open Space, GCC Lowlands Master Plan

The 2008 plans for the full renovation, pictured above left, included a new swimming pool, basketball courts, handball courts, an open green plaza, a year-round multi-purpose building containing bathrooms and community spaces with a green roof, as well as more trees and plantings throughout the renovated park.

In 2017, FoTGP and GCC took part in the [North Canal Visioning Process](#), with partner organizations Community Board 6, Fifth Ave Committee, Wyckoff Gardens Tenants Association, Gowanus By Design, Gowanus Canal Community Advisory Group, Gowanus Landmarking Coalition, and Wyckoff Gardens Tenants Association, and with partner elected officials Congresswoman Velazquez, Assemblymember Simon, and Councilmember Levin. This process reiterated the recognized needs from the 2008 public process, and identified the needed connection to the new public space on top of the CSO tank, by de-mapping or calming Nevins Street. This process led to an updated vision for the renovation, shown at right above, from GCC's 2019 [Gowanus Lowlands Master Plan](#).

New York City committed to renovating Thomas Greene Park in the 2021 [Gowanus Rezoning Points of Agreement](#), overseen by the Gowanus Oversight Task Force. As the neighborhood grows, with an estimated 20,000 new residents moving in by 2035, these planned park renovations are critical to serve the growing population.

We understand that EPA has recently requested that National Grid perform a pilot this fall utilizing In-Situ Geochemical Stabilization (ISGS) for remediation, and that that technique could “obviate the need to demolish and temporarily relocate the pool” ([July 9, 2025 letter](#) from Michael Sivak to CAG Land Use Committee). Given that we and other park users have been waiting for over 15 years for a full park renovation, we are eager to understand the efficacy of this method and the short and long term impacts on the Park, particularly how the use of ISGS will impact the ability to construct needed park renovations now and into the future.

In advance of the pilot and further planning for remediation, we request that EPA take the following key steps to ensure the approach chosen meets the needs of the community and that park stakeholders are consulted and informed:

1. A meeting with our organizations to better understand the current uses and future needs of Thomas Greene Park
2. A comprehensive presentation to the community, in a manner and venue that is accessible to park users, such as a community-wide town hall.
3. Close coordination with the Parks department to ensure that planned remediation activities do not impede future park renovation

Key subjects and questions that should be covered in these meetings include:

1. Overall layout and depth of contamination.
2. Why ISGS is being considered instead of the excavation.
3. Comparison of how each remedy is protective of human health.
4. Anticipated impacts on park operations from remediation by ISGS versus excavation or ISS.
5. Anticipated impacts on mature canopy trees from remediation by ISGS versus excavation or ISS.
6. The planned approach to needed park renovations for the western two-thirds of the park, including timeline and responsibility for costs.
7. How the use of ISGS will impact the ability to excavate and construct foundations for future park renovations, including construction of a new pool and building.
8. Your letter states *“if future pool renovations are planned after the cleanup has been completed, EPA anticipates that ISGS will not preclude such work, provided that standard post-cleanup site management plan provisions are followed”*. Who would be responsible for following these provisions and how would that work be funded? If that work remained National Grid’s liability, would there need to be another EPA administrative order in place to compel that work?
9. If funds would be saved by ISGS, and if those funds could support park renovation.

Sincerely,

Alexandra Dadourian-Nelson, Chair, Friends of Thomas Greene Park
Andrea Parker, Executive Director, Gowanus Canal Conservancy

CC:

Congress Member Dan Goldman (John Blasco, Deputy Chief of Staff/District Director)
NY State Senator Andrew Gounardes (Maia Yedin, Deputy Chief of Staff)
NY State Assembly Member Jo Anne Simon (Talia Hoch, Community Liaison)
NYC Council Member Shahana Hanif (Matthew Malloy, Chief of Staff)
Iris Rodriguez-Rosa, Commissioner, NYC Department of Parks & Recreation
Martin Mahar, Brooklyn Parks Commissioner, NYC Department of Parks & Recreation