



GOWANUS CANAL COMMUNITY ADVISORY GROUP (CAG)

your local voice for Superfund

For more information: www.GowanusCAG.org

TO:

Michael Sivak, Chief, Mega Projects Section, U.S. Environmental Protection Agency
Patrick Foster, Deputy Commissioner for Environmental Remediation and Materials Management, New York State Department of Environmental Conservation
Lisa F. Garcia, Commissioner, New York City Department of Environmental Protection

The Gowanus Protection Framework: Coordinating Protection Across Multiple Agencies, Sites, Contractors and One Neighborhood

The Gowanus Canal Community Advisory Group (CAG) proposes a collaborative Gowanus Protection Framework—built on transparent safety thresholds, clear monitoring protocols, single points of contact, and advance community notice—to ensure coordinated communication from the EPA, DEC, and DEP. We ask all three agencies to use our monthly General Meetings as the shared forum for regular updates on canal and upland remediation progress; in turn, the CAG will partner to spread this information and keep the community fully informed. To that end, ***the CAG asks the EPA, DEC, and DEP to adopt this framework.***

Why The Gowanus Protection Framework Is Needed

The Gowanus Canal and neighborhood is undergoing remediation overseen by multiple agencies:

- Dredging of canal contamination, overseen by the US Environmental Protection Agency (EPA) under the Superfund program.
- Remediation of upland brownfield and superfund sites under the New York State Department of Environmental Conservation (DEC) Superfund and Brownfield programs.
- Construction of two massive sewage retention tanks by the New York City Department of Environmental Protection (DEP), overseen by the EPA under the Superfund program.

These overlapping activities are addressing longstanding neighborhood contamination — but they are also causing significant ground disturbance, with real risks of contamination exposure and quality of life impacts in a densely populated urban neighborhood.

Gowanus neighbors have lived with the disruptive impacts of remediation for decades. The complexity increases significantly when multiple adjacent sites are active simultaneously. In recent years, several excavations were underway around the Fulton Manufactured Gas Plant (MGP) site, overseen by different agencies. Residents reported strong mothball odors and numerous complaints were documented.¹ It was difficult even for the agencies to pinpoint which site the odors were coming from, leaving community members without clear information about what they were smelling and whether it was unsafe. When neighbors reported noxious odors, they were often ignored and dismissed. Calls for coordination across agencies went unheeded, leaving residents without clear answers for months. What happened there remains a source of justified concern for people who live, work, learn, and play in the neighborhood.

¹ The eleven-month record of complaints can be found at:
https://drive.google.com/file/d/1Qm_I6WRBKvt-ZJtwcla7nvrYpaVG-A2/view?usp=drive_link



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More remediation is ahead: excavation is underway at the Owl's Head sewage retention tank; cleanup at the Citizens MGP site is imminent; and the second phase of canal dredging in RTA 2, between 3rd Street and Hamilton Avenue, is scheduled to begin 2028.

The CAG wholeheartedly supports these cleanup efforts. But residents, schools, businesses, and public spaces experience their impacts cumulatively — dust, odors, trucking, noise, and air quality concerns do not occur in isolation when multiple projects are active in the same neighborhood.

To that end, we are proposing a framework that acknowledges the agencies' work to remove neighborhood contamination while asking for more transparent and accessible communication and agency response. Specifically, we ask agencies to use the CAG's monthly General Meetings — an existing forum already in place — as the mechanism for coordinating community-facing information across projects, not only at the individual site level but at the neighborhood scale. The CAG commits to supporting the dissemination of this information to the broader community.

The Framework

Recent CAG discussions with EPA and DEP on the Owl's Head site clarified how air quality and odors are monitored, what data are collected, what thresholds trigger protective actions, and who residents should contact with complaints. DEP's contractor AECOM has also been reaching out proactively to nearby residents and businesses with postcards about the upcoming remediation activities.

Together — monitoring networks, action thresholds, single points of contact, and pre-work outreach — these elements model a protective framework that should apply not just to Owls Head, but for the remediation moving forward, including at the Citizen's site and RTA 2.

We know that DEP, DEC and the EPA each already implement some version of this oversight. We are asking all three agencies to commit to a regular, predictable rhythm of communication — using the CAG's monthly General Meetings as the shared forum — and to report against a common set of information: what is being monitored, what thresholds trigger protective actions, and what those actions are. This allows the broader neighborhood to understand what is happening across all sites, hold agencies to consistent expectations, and track progress and raise concerns month by month.

What We Ask of the Agencies

Communications & Coordination

Pre-Project Briefings: Before breaking ground, the CAG asks each agency to present remediation plans at a monthly CAG General Meeting that's open to the public, covering scope, timeline, how health and quality of life impacts will be monitored, what actions will be triggered if thresholds are exceeded, and the designated community contact for questions, issues and complaints.



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Community Outreach: The CAG asks each agency to adopt the proactive postcard and direct messaging model used by DEP/AECOM to reach residents, businesses, schools, and daycares with clear contact information for reporting issues.

Single Point of Contact: The CAG asks each agency to share the contact information and the name of the primary contact for complaints, with a named escalation contact and their contact information if a timely response is not received.

Monthly Progress Reports: The CAG asks DEC and DEP to join the EPA in presenting monthly remediation updates at CAG General Meetings, so the community can track milestones, ask questions, and raise concerns.

Interagency Coordination: The CAG asks each agency and their contractors to use the CAG's monthly General Meetings as the primary forum for sharing information across overlapping projects — including air monitoring results, odor events, trucking routes, schedules, and community complaints. Consistent participation by all three agencies is essential to reduce cumulative impacts, avoid conflicting public messaging, and ensure residents know who is responsible for responding to their concerns.

Monitoring & Reporting

Air Quality Monitoring: The CAG asks each agency to deploy monitoring not only at the site perimeter but at nearby sensitive receptor locations — schools, daycares, and playgrounds. If an agency determines this is unnecessary, it should provide a written public explanation.

Particulate Monitoring (PM10): The CAG asks each agency to publicly disclose the action levels that trigger dust suppression and work stoppage, whether monitors are placed at sensitive receptor locations as well as the site perimeter, and whether more protective thresholds apply at those sensitive locations.

Odor Monitoring: Odor monitoring is the protection most directly felt by residents, yet the least standardized across the three agencies. We ask each agency to publicly disclose: how odor monitoring is conducted; whether it extends to sensitive receptor locations beyond the site perimeter; what constitutes a confirmed off-site odor event and who makes that determination; and the specific response timeline and suppression measures pre-positioned for deployment.

Naphthalene Monitoring: Naphthalene is the compound most directly associated with the odor complaints. We ask each agency to publicly disclose in language and data that is understandable to the average resident how naphthalene is monitored, and whether naphthalene-specific action levels have been established.



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Escalation Thresholds: Each agency uses numerical thresholds for VOCs, PM10, odors and naphthalene that trigger increasingly protective responses — from work modification through work stoppage to tented containment. These thresholds vary across agencies, and are not always aligned with the community experience, particularly for noxious odors. We ask each agency to publicly disclose its full escalation framework, from first alert to work stoppage to full containment, and provide clarity about escalation protocol to address odors that impact quality of life.

Near Real-Time Data: The CAG asks that all three agencies commit to making contractor-reported monitoring data publicly available through daily or weekly publication of real-time monitoring data from the CAMP monitors, or other relevant real-time monitors, with immediate (within 24 hours) community notification of any validated threshold exceedances and the corrective actions taken. We additionally want validated data from SUMMA canisters made publicly available as soon as possible. This allows the community to verify conditions as they occur, build trust in agency procedures, reduce confusion across overlapping projects, and make informed decisions about health and daily activities.

A Note on DEC

We understand this framework could be a large undertaking for DEC, given the number of neighborhood sites in its Brownfield and Superfund programs. However, DEC's InfoLocator tool is a cumbersome tool that many community members find challenging to navigate. In order to address the need for more accessible information about these sites, we ask that DEC:

1. Hold bi-annual public meetings that include:
 - a. A forward-looking overview of all sites expected to start active remediation in the coming six months.
 - b. A review of work completed in the past six months with attention to any issues.
 - c. Breakout time for neighbors to speak with agency staff about specific sites.

These meetings should include technical and legal DEC staff as well as DOH personnel in order to ensure that all the community's questions are answered, held in the neighborhood at times accessible to working residents.

2. Send the CAG Outreach Committee an email before any site breaks ground, including:
 - a. The remediation start date.
 - b. The link to the cleanup plan.
 - c. The link to the monitoring plan.
 - d. Site contact information.The Outreach Committee will compile and publish this information on the CAG website.

3. Email the Outreach Committee of the CAG when there is an exceedance that requires corrective action, so that CAG can help get the word out to the surrounding community.



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What the CAG Commits To

By putting forth this framework and seeking the agreement of the EPA, DEC and DEP, the CAG commits to supporting the dissemination of this information to the broader community, through the following:

1. Host monthly CAG meetings that act as a central forum for the agencies to share information with the community on a regular basis about remediation plans and progress, while working to streamline and coordinate CAG agendas and discussion so that agencies can provide timely updates.
2. Play a productive role in the broader community to address issues, concerns, questions or complaints about the remediation impacts, including:
 - a. Host annual Town Hall meetings where agencies provide high level overview and progress of all remediation activities, so that all neighbors are able to learn about the ongoing work.
 - b. Manage an active website and social media presence that amplify agency updates.
 - c. Manage a live list of active remediation projects, that compiles the above information provided by agencies.
 - d. Develop and implement an outreach plan to reach community members throughout the neighborhood that may not be represented on the CAG.

We appreciate your consideration and look forward to working proactively with you to ensure that the Gowanus community is aware and engaged in understanding ongoing remediation activities. If you have questions or comments, please reach out to Jason Schwartzman/Moderator of the Outreach Committee (jischwartzman@gmail.com) or Steve Marcus/Moderator of the Land Use Committee (stevemarcus7@gmail.com).

CC:

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Elected Officials

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