

Appendix E

Natural Resources

Appendix E.1

Species List

Reach 1 | Proposed Planting Palette



FEATHER REED GRASS
Calamagrostis 'Karl Foerster'



COMMON YARROW
Achillea millefolium



BLUE INDIGO
Baptisia australis



ORANGE CONEFLOWER
Rudbeckia fulgida



PURPLE PRAIRIE CLOVER
Dalea purpurea



GOLDEN FLEECE AUTUMN GOLDENROD
Solidago sphacelata



LITTLE BLUESTEM
Schizachyrium scoparium 'Standing Ovation'



BLUE GRAMA
Bouteloua gracilis

Reach 2 | Proposed Planting Palette

GATEWAY



EASTERN REDBUD
Cercis canadensis



TWOLEAF MITERWORT
Mitella diphylla



VIRGINIA BLUEBELLS
Mertensia virginica

BUILDING BUFFER



SWEETBAY MAGNOLIA
Magnolia virginiana



OAKLEAF HYDRANGEA
Hydrangea quercifolia



LADY FERN
Athyrium filix-femina

SHORELINE EDGE



BLACK TUPELO
Nyssa sylvatica



SUMMERSWEET
Clethra alnifolia 'Ruby Spice'



SWITCH GRASS
Panicum virgatum



EASTERN RED CEDAR
Juniperus virginiana



ENGLISH YEWE
Taxus baccata 'Repandens'

Reach 3 | Proposed Planting Palette

STREETSCAPE



WILLOW OAK
Quercus phellos



HAY SCENTED FERN
Dennstaedtia punctilobula



WILD PETUNIA
Ruellia humilis



ORANGE CONEFLOWER
Rudbeckia fulgida



BLUE GRAMA
Bouteloua gracilis



COMMON YARROW
Achillea millefolium

PLAYGROUND



RED OAK
Quercus rubra



WINTERBERRY
Ilex verticillata



VIRGINIA SWEETSPIRE
Itea virginica

BIOSWALE



SWAMP ROSE
Rose palustris



SILKY DOGWOOD
Cornus amomum

Reach 4 | Proposed Planting Palette

DUNE



PITCH PINE
Pinus rigida



EASTERN RED CEDAR
Juniperus virginiana



SWAMP WHITE OAK
Quercus bicolor



PUSSY WILLOW
Salix discolor



NORTHERN BAYBERRY
Myrica pensylvanica



CAROLINA ROSE
Rosa carolina



SHRUBBY ST. JOHN'S WORT
Hypericum prolificum



SMOOTH SUMAC
Rhus glabra



INDIAN GRASS
Sorghastrum nutans



SWITCHGRASS
Panicum virgatum



BLUE GRAMA
Bouteloua gracilis



PINK MUHLY GRASS
Muhlenbergia capillaris

ESPLANADE



RED OAK
Quercus rubra

Reach 5 | Proposed Planting Palette

FLOWERING ALLEY



APPLE SERVICEBERRY
Chionanthus retusus



SHRUBBY ST. JOHN'S WORT
Hypericum prolificum



STEEPLEBUSH
Spiraea tomentosa



SWAMP MILKWEED
Asclepias incarnata



EASTERN BEE BALM
Monarda bradburiana



SARGENT CHERRY
Prunus sargentii



WINTERBERRY
Ilex verticillata



ROSE MALLOW
Hibiscus moscheutos



CAPE BREEZE SWITCH GRASS
Panicum virgatum 'Cape Breeze'



LENTEN ROSE
Helleborus orientalis



RED OAK
Quercus rubra



NEW JERSEY TEA
Ceanothus americanus



SWEET FERN
Comptonia peregrina



NORTHERN SEA OATS
Chasmanthium latifolium



CREeping PHLOX
Phlox stolonifera

Reach 6 | Proposed Planting Palette

IMMERSIVE FOREST



SWAMP WHITE OAK
Quercus bicolor



BLACK GUM
Nyssa sylvatica



HACKBERRY
Celtis occidentalis



BALD CYPRESS
Taxodium distichum



SASSAFRAS
Sassafras albidum



WHITE FRINGETREE
Chionanthus virginicus



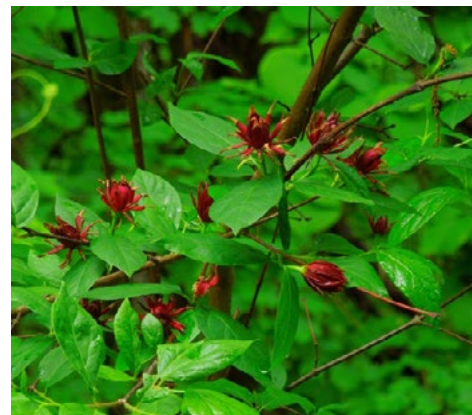
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AMERICAN HOLLY
Ilex opaca



EUROPEAN GRAY ALDER
Alnus incana ssp. rugosa



SWEETSCRUB
Calycanthus florida



EASTERN COLUMBINE
Aquilegia canadensis



MARSH FERN
Thelypteris palustris

WOODLAND EDGE



GOLDEN RAGWORT
Packera aurea



INLAND SEA OATS
Chasmanthium latifolium



BOTTLEBRUSH GRASS
Elymus hystrix



PURPLETOP
Tridens flavus



PRAIRIE IRONWEED
Vernonia fasciculata



SWITCHGRASS
Panicum virgatum 'Prairie Sky'

Reach 7 | Proposed Planting Palette

PRIMEVAL FOREST



RED MAPLE
Acer rubrum



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Magnolia virginiana



NORTHERN BAYBERRY
Myrica pensylvanica



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Panicum virgatum



WHITE HEATH ASTER
Aster ericoides



PALM SEDGE
Carex muskingumensis

PLANTED BUFFER



GOATSBEARD
Aruncus dioicus



INLAND SEA OATS
Chasmanthium latifolium



WILD GERANIUM
Geranium maculatum



OSTRICH FERN
Matteuccia struthiopteris



AUTUMN BRIDE HAIRY ALUMROOT
Heuchera villosa 'Autumn Bride'



JAPANESE SPURGE
Pachysandra terminalis

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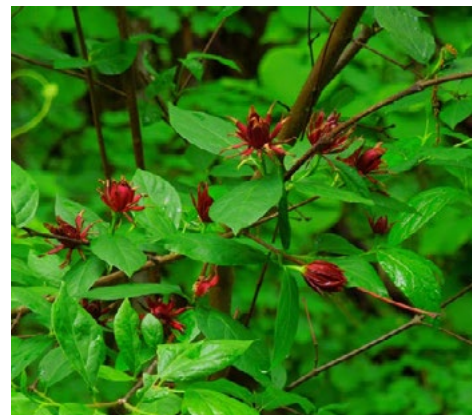
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Appendix E.2
Water Quality Memo

Memorandum

Date: 11/17/24
Re: NWBPC DEIS – Response to Water Quality comments
From: Arcadis

This memo responds to comments received on the North/West Battery Park City DEIS in regard to the project's potential for significant adverse impacts on the water quality of the Hudson River. Please find attached the full comment letters from those listed below (note these also include comments unrelated to water quality). Manhattan Community Board 1's comment letter raised similar concerns regarding discharge to CSO outfall NCM-073.

- Deborah Glick, New York State Assembly
- The Hudson River Park Advisory Council
- Hudson River Park Trust
- The City Club of New York
- Riverkeeper, Inc.

Water Quality

Consistent with SEQR and the analysis framework presented in the DEIS, the identification of potential significant adverse impacts should focus on the incremental changes to the affected environment that would occur under the Proposed Project as compared with the No Action condition. With respect to the analysis presented herein, the No Action condition comprises the water quality conditions that would occur within the southern portion of the Hudson River Park Estuarine Sanctuary (Sanctuary) south of Piers 25 and 26 specifically during the design storm conditions, with a more general characterization of water quality conditions that would occur within the remaining portion of the Sanctuary.

In 1998, the Hudson River Park Act (Act) designated the Hudson River Park's open water areas as the Sanctuary and charged the Hudson River Park Trust with developing an Estuarine Sanctuary Management Plan (ESMP) to guide Park development and operations in and along the Hudson River within the Park's boundaries. The ESMP serves as a management document that guides the Hudson River Park Trust and its partners in protecting and conserving critical aquatic habitat while also facilitating public access and fostering awareness and public education of the natural resources of the Hudson River. The section of the Sanctuary below Piers 25 and 26 is designated for small- to medium-sized vessels that normally operate under power including provision for

mooring. Examples include privately owned pleasure and commercial boats, historic, research, cultural or educational vessels, and water taxis or other similar small- to medium-sized transportation vessels.

The evaluation of the With Action condition evaluates the incremental impacts from the Proposed Project during the design storm compared to the No Action condition.

Design Storm Conditions without the Project

If the design storm conditions were to occur without the Proposed Project, approximately 5 feet of storm surge¹ would be anticipated within the Hudson River in the vicinity of Battery Park City and the southern portion of the Sanctuary. This large rise in water elevation would result in a substantial increase in the volume of water within the Hudson River and within the Sanctuary. Ultimately, the surge of water would raise the elevation of the water within the Sanctuary, overtop the riverfront and flood Route 9A (i.e. West Street) and the adjoining streets of Tribeca to the east approximately up to the higher elevation of Greenwich Street.² The surge would also send flood waters to the south along the Route 9A corridor, flooding surrounding areas to the west throughout BPCA property and to the east approximately to Greenwich Street.

The initial surge would also cause additional river water to move into these same upland areas through stormwater and combined sewer overflow outfalls because the normal flow of water would be reversed, and this would flood streets, basements, and potentially ground floors in residential and commercial buildings.

After the peak surge, based on the topography of the area, much of the surge waters in these streets would flow into Route 9A and recede into the southern portion of the Sanctuary. Such surge water returning back to the river would carry with it numerous contaminants such as:

- Sediment from the road surfaces, sidewalks, and planted areas
- Floating debris and trash
- Combined sewer effluent
- Debris and contamination from inundated residences and commercial structures

¹An abnormal rise of water generated by a storm, over and above the predicted astronomical tides.

² The overtopping of the riverfront caused by the surge would also be occurring along the full extent of the Sanctuary to the north of Tribeca, effectively dissolving for the duration of the surge the boundaries between different segments of the Sanctuary and between the Sanctuary and the river at large.

- Debris and chemical contaminants from submerged vehicles and vessels³



As noted by Riverkeeper following Superstorm Sandy:

The impact of Sandy's storm surge is enormous, causing widespread pollution of the Hudson River and New York Harbor by a variety of toxic chemicals, including petroleum and fluids from cars and boats; contaminants from flooded subways, roads, parking lots and tunnels; and contaminants washed from shoreline industrial sites, as well as commercial and residential buildings.

Oil sheens and debris have been observed—everything from 55-gallon drums and quart-sized containers of transmission fluid, to wrecked boats and swamped vehicles with leaking fuel tanks. Just about anything that can float is being observed.

Source <https://www.riverkeeper.org/news-events/news/stop-polluters/pollution-enforcement/sandy-pollution-statement/>

³ <https://pubs.usgs.gov/fs/2013/3091/>

After the initial surge has retreated to within the Hudson River, the water elevations in the Sanctuary would decrease allowing the flooded combined sewer system to begin draining. There are 29 existing NYC DEP regulators located within the entire Sanctuary, each of which would discharge into the Hudson River as soon as the surge subsided. Collectively, this volume of water discharged following the design event would be greater than rain-only-induced CSO events, as it would include rainfall from the storm and the surge water

These discharges from the CSO outfalls would contain untreated sewage, sediment, debris, and chemical products that have entered the collection system through car garages and incidental residential disposal.

As noted in the City's Report A Stronger, More Resilient New York,

"Sandy's surge led to the release of wastewater into New York's waterways. As DEP reported, approximately 560 million gallons of untreated combined sewage, stormwater, and seawater from sewers, and another approximately 800 million gallons of partially treated and disinfected wastewater, were released into waterways.

[A]s a precautionary measure, two days after Sandy, the City issued a recreational water body advisory for the Hudson and East Rivers, New York Harbor, Jamaica Bay, and the Kill Van Kull. The advisory remained in place for 30 days and was lifted after DEP testing confirmed that the waterways were safe.

(The City of New York, A Stronger, More Resilient New York (June 2013), p. 210-211, at https://www.nyc.gov/assets/sirr/downloads/pdf/Ch_12_WaterWaste_FINAL_singles.pdf.)

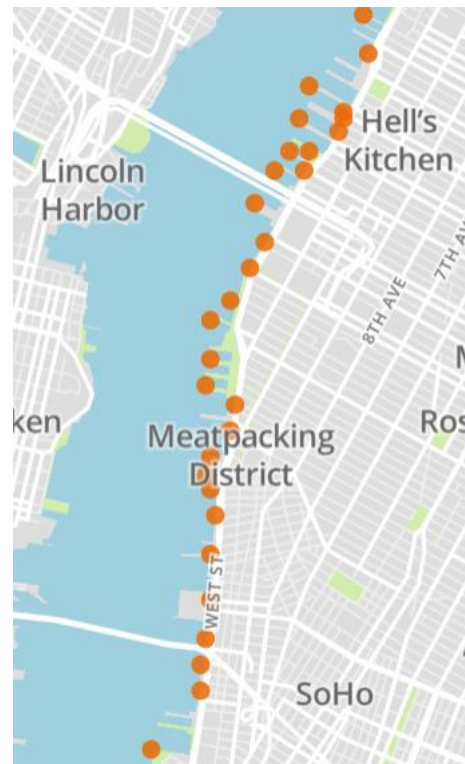


Figure 1 - CSOs Within Hudson River Park

Design Storm Conditions with the Project

Under the design storm conditions with the Proposed Project, a similar degradation of water quality would be experienced for any floodwaters that reached upland areas and subsequently flowed back into the river overland or through combined sewer overflows. However, with the changed conditions created by the Proposed Project, not only would there be no significant negative impact to the water quality within the southern portion of the Sanctuary, but it is likely that the effect of the Proposed Project on water quality in this area would be beneficial when compared to the No Action Storm Condition.

First, an appreciable portion of the area that would be inundated by the storm surge and later flow directly back into the southern section of the Sanctuary in the No Action Storm Condition would be protected by the Proposed Project and therefore, would not be inundated. This area includes the entire Route 9A corridor from North Moore St south to Battery Place and represents approximately 5 million square feet or 110 acres of city streets, blocks, residential structures, and commercial

buildings. Without the Proposed Project, the surge that would occur during the design storm would result in an estimated 5 feet of floodwater, resulting in an estimated water volume of more than 70 million gallons⁴. With the Proposed Project, this 110-acre area would not be inundated and would, therefore, not contribute more than 70 million gallons of overland floodwater contaminated with debris and contaminants back into the southern portion of the Sanctuary following the surge. This difference represents a decrease in pollutant loading in the Sanctuary that is directly attributable to the Proposed Project.

Second, the Proposed Project includes a pump station located at Stuyvesant Plaza. The underground pump station is comprised of pumps and a receiving “wet well.” When the existing combined sewer network flows into the wet well, the surface elevation in the wet well increases, and the pumps are triggered to turn on and the water is discharged through pipes to the downstream side of the tide gate before discharging through the existing CSO outfall NCM-073

During the design storm, this pump station would draw water from the existing combined sewer and pump it to the downstream side of the tide gate before discharging through the existing CSO outfall NCM-073. To manage flooding across a larger area, additional piping is proposed to connect regulators associated with outfalls NCM-073 and NCM-072. Additionally, as the sanitary connection to the interceptor would be closed during the storm, the existing sanitary connection along Vesey Street would be redirected to the existing combined sewer system and connected hydraulically to the pump station to prevent sanitary backups into the buildings and streets within the northern Project Area. The connection to NCM-072 and the redirection of the sanitary connection along Vesey Street would redirect approximately 2 million gallons of combined sanitary and stormwater flows to CSO outfall NCM-073 during these infrequent, extreme coastal storm events.

Table 1 shows the redirection of flow that would occur during the design storm event with the Proposed Project, shifting approximately 2 million gallons from outfall NCM-072 to NCM-073 over a 24 hour period, approximately 10 percent of which would be sanitary flows from buildings, and the remaining 90 percent would be redirected flows from the combined and separate stormwater systems.

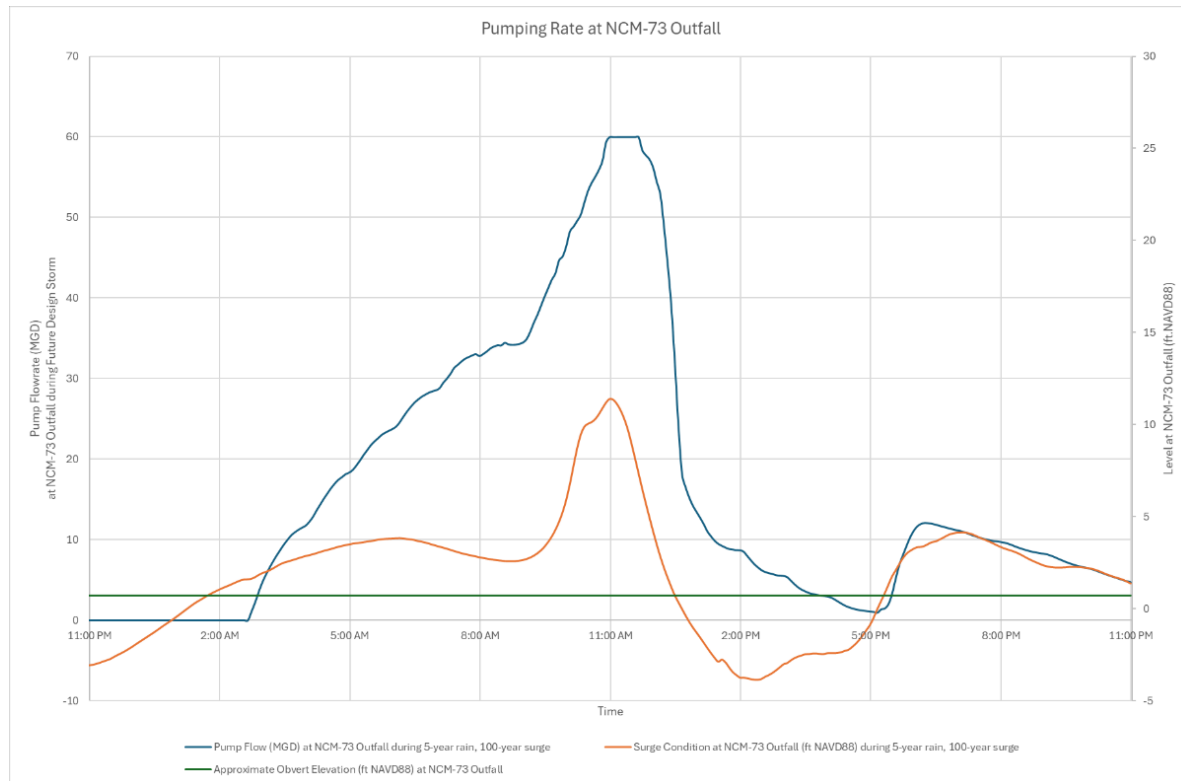
Table 1 – Flows to Combined Sewer Outfalls 073 and 072

Combined Sewer Outfall	Flow Without Project	Flow With Project
NCM-073	13.8 MG	15.9 MG
NCM-072	13.6 MG	11.8 MG
Total Flow	27.4 MG	27.7 MG

As noted above, the pump station would be operated during storm events that would otherwise prevent the discharge of flow through NCM-073 because the tidal elevation in the Hudson River would prevent flows through the outfalls. Thus, as depicted in the figure below, the discharge of the 15.9 MG from NCM-073 would occur during a storm surge that would result in higher volumes of water within the Hudson River and the southern portion of the Sanctuary. The increased volumes of water would result in high levels of mixing conditions in the Sanctuary. The benefit of this proposed

⁴ Estimated water volume of more than 70 million gallons without sea level rise, and more than 130 million gallons with sea level rise.

arrangement is that some or all of the same combined sewer flow that would have been discharged to the river *after* the surge event when the receiving volume of the river is lower is actually being discharged when the volume is higher and has a greater chance to mix.



The City has acknowledged that the additional water in the Harbor during a storm can help mitigate the impacts of the contamination that occurs as a result of the storm:

After Sandy, DEP collected samples of water quality throughout the harbor. Data from these samples showed that water quality in New York Harbor was not affected significantly by the storm.,,, Part of the reason that Sandy's impact on water quality was so limited was likely Sandy itself. The same high volume of seawater that affected some DEP assets also helped to dilute the discharge of untreated or partially-treated sewage.

(A Stronger, More Resilient New York, p. 211.)

Based on the overall pollution load reduction that would result from the Proposed Project, the addition of approximately 2 million gallons of combined sanitary and stormwater flow at NM-073 during extreme storm conditions would not result in a significant water quality impact.



DEBORAH J. GLICK
Assemblymember 66th District
New York County

The Assembly State of New York

CHAIR
Committee on
Environmental Conservation

COMMITTEES
Governmental Operations
Rules
Ways and Means

October 4, 2024

Battery Park City Authority
200 Liberty Street, 24th Floor
New York, NY 10281

Dear North/West Battery Park City Resiliency Team:

I am writing to convey my concerns about the North/West Battery Park City Resiliency Project's potential impact on the Hudson River Park Estuarine Sanctuary, as outlined in the Draft Environmental Impact Statement (DEIS) released on August 28, 2024. While I no longer represent Battery Park City, I did for many years, and I continue to hear from community members. I also understand that while the resiliency plan focuses on Battery Park City (BPC) it will impact part of my district, east of Route 9A/West Street and north to Harrison Street and beyond, as well as Hudson River Park (HRP), much of which falls in my district and which is regulated through State Legislation.

The DEIS's proposed new pump station includes plans for a sewer main to be installed below the Hudson River's surface under the Hudson River Park esplanade between BPC and Pier 25 and connected to an existing combined sewer outfall (CSO) in HRP's Estuarine Sanctuary – meaning any surface water collected by the BPC barrier system after a storm event would be pumped into this section of the Sanctuary. The area in question is a corner of bulkhead walls, which will make circulation difficult and any untreated surface water pumped into the area would not dissipate easily, potentially causing harm to the Sanctuary.

The Estuarine Sanctuary is a critical habitat to a vast array of wildlife including many species of fish and serves as a vital resource for migrating birds. Hudson River Park's careful stewardship of the Sanctuary over many years is a central part of their mission and contributes to the overall health of the river and of New Yorkers who rely on the river for recreation. Untreated surface water polluted with motor oil and other detritus being pumped into the Sanctuary and essentially getting stuck there would be counter to ongoing conservation efforts and could damage this delicate ecosystem.

I urge Battery Park City to modify the plan in order to prioritize the protection of the Sanctuary. It is my understanding that you are still coordinating with the New York City Department of Environmental Protection on the design of the new pump station and am hopeful that you will work together to find an alternative method of dispersing captured storm water, which will take that water further into the free flow of the river.

While I appreciate the complexity of designing appropriate resiliency measures, all climate change mitigation efforts should also strive to ensure the health of New York's waterways.

Sincerely,


Deborah J. Glick
Assemblymember



October 1, 2024

SUBMITTED TO:

BPCA, NW RESILIENCY TEAM @ nwbpcrinfo@bpca.ny.gov

Comments on the North/West Battery Park City Resiliency Project Draft Environmental Impact Statement (DEIS)

October 1, 2024

The following comments reflect the Public Concerns from the Hudson River Park Advisory Council (HRP AC). The HRP AC was established to provide advice and recommendations to the Board of the Hudson River Park Trust regarding all matters concerning the planning, design, construction, and operation of Hudson River Park.

The HRP AC is deeply concerned that the Draft Environmental Impact Statement (DEIS) for the North/West Battery Park City (BPC) Resiliency Plan fails to adequately address the project's impact on encroachment and water quality within the designated estuarine sanctuary in Hudson River Park.

On September 12, 2023, the North/West BPC Resiliency Plan team presented the proposed plan to the HRP AC. At the 30% design phase, the plan had significant above-ground and in-water impacts on Hudson River Park that lacked broad support. The Council appreciates the subsequent design changes, including moving the alignment north of Chambers Street to the east side of Route 9A, which addressed many of the concerns raised.

After these changes more information was released with the DEIS on August 28, 2024; while not all the information has been shared, the updated plan still involves discharging untreated rainwater and floodwater from street surfaces into the Hudson River Estuary. The HRP AC remains highly concerned about the negative impact this will have on water quality and habitat within the estuarine sanctuary, due to increased volume of the combined sewer overflow (CSO) discharges. The Estuary is an environmentally sensitive water body that must be protected.

After decades of work to protect the Hudson River Park Estuary, culminating in its designation as a sanctuary, it is unacceptable to increase untreated discharges into this area, especially to a corner with poor water circulation and extensive recreational use, such as sailing and kayaking.

The HRP AC urgently demands that the BPCA address the following concerns in the Final Environmental Impact Statement (FEIS) and the project:

1. ****Alternative Water Runoff Solutions****: Consider alternative means of managing runoff from Battery Park City, such as capturing and routing it to a wastewater treatment facility.
2. ****Rerouting CSO Discharges****: Explore the possibility of connecting to a CSO that discharges further west into the Hudson River, thereby avoiding the estuarine sanctuary.

3. ****Tertiary Study****: Conduct a thorough study to evaluate and incorporate the additional measures required to protect and mitigate impacts on the sanctuary.
4. ****Mooring Area Protection****: The proposed structure overlaps with the mooring area, which the HRP AC believes would reduce public access and benefit. Any reduction in mooring spaces is unacceptable.
5. ****Long-term Funding Commitment****: The HRP AC seeks a commitment from BPCA for long-term funding to be provided to the Hudson River Park Trust to ensure adequate maintenance of the new structures.

Given the potential impacts on the Estuary and southern Hudson River Park, it is imperative that the North/West Battery Park City Resiliency Project include substantial mitigation measures to protect and enhance the estuarine sanctuary.

Thank you for this opportunity to provide public comment.

Respectfully from the Chair, 1st Vice Chair, and 2nd Vice Chair of the Hudson River Park Advisory Council,

Tammy Meltzer, Chair



Jessica Chait, CB4, 1st Vice Chair



Susan Kent, CB2, 2nd Vice Chair



CC:

Noreen Doyle, President & CEO Hudson River Park Trust



Hudson River Park Trust
353 West Street
Pier 40, 2nd Floor
New York, NY 10014
P 212.627.2020
F 212.627.9224
hudsonriverpark.org

October 4, 2020

Battery Park City Authority
200 Liberty Street
24th Floor
New York, NY 10281
ATTN: North/West Battery Park City Resiliency Team
and Claudia Filomena, Senior Director of Capital Projects
Email: nwbpcrinfo@bpca.ny.gov

Re: Hudson River Park Trust Comments on the Draft Generic Environmental Impact Statement for the “North/West Battery Park City Resiliency Project”

Dear Ms. Filomena:

The Hudson River Park Trust (“HRPT” or “the Trust”) has reviewed the *North/West Battery Park City Resiliency Project: Draft Generic Environmental Impact Statement* (the “DEIS”) as released by Battery Park City Authority (“BPCA”) on August 28, 2024 and has the following comments on the Proposed Project. Overall, the DEIS addresses many of the comments previously raised by HRPT, beginning with BPCA’s early planning of the Proposed Project several years ago and continuing through current planning meetings with respect to construction that would occur within Hudson River Park and within the Park’s Estuarine Sanctuary.

HRPT is an involved agency and, as acknowledged in the DEIS, BPCA will need a construction permit from HRPT for the work that would occur in the southern portion of Hudson River Park – on both land and in the Estuarine Sanctuary. As currently contemplated, an Easement will also be required for BPCA’s permanent use of a portion of the Sanctuary area and for certain below-ground infrastructure in Hudson River Park and required for the Proposed Project. HRPT writes these comments to reiterate previously discussed commitments required of BPCA, including mitigation of impacts where feasible, that should be reflected in the final design of the Proposed Project as well as in the corresponding permits and approvals needed from various other involved agencies for construction and operation of the Proposed Project.

HRPT's Comments regarding Design and Construction Impacts on the Land Portion of Hudson River Park

First, pursuant to HRPT's early concerns about the Proposed Project's impacts to Hudson River Park ("HRP"), HRPT is pleased that BPCA's preferred alternative for its "Proposed Action" is to locate the flood protection measures on the eastern side of Route 9A and to cross Route 9A near Harrison Street as opposed to earlier plans that would have had the project extended further north into HRP while hugging the adjacent Route 9A bikeway that runs parallel to HRP. HRPT is also pleased that Chapter 1 of the DEIS (Project Description) acknowledges that HRPT will be involved in detailed inter-agency design coordination in the area where the two parks meet as it is important that the aesthetics and pedestrian experience for those entering HRP meets the design standards of HRPT and works logistically for both public benefit corporations and their patrons. Further, Chapter 3.11.1 on Construction also acknowledges that BPCA and its community liaisons will need to work closely with HRPT during construction, particularly related to utility replacement and other disturbances that will affect HRP's operations temporarily.

Nonetheless, BPCA has acknowledged to HRPT that HRP patrons will likely have to endure four to five years of construction in this area in order to construct the Proposed Project. In addition, the Proposed Project will result in permanent impacts to the southern portion of HRP that may affect HRPT's decisions regarding the future use and design of the southern portion of HRP. That said, HRPT also understands the difficult decisions required to balance the impacts to the Park's many users, as well as the residents, businesses and cultural and educational institutions located within and adjacent to Battery Park City with the important long-term goal of protecting lives and property from future storm surge events.

With regard to the specific impacts to HRP, the Figures of the Proposed Project included in the DEIS show that a 48-inch diameter sewer main will be installed below the surface of HRP to connect to an existing combined sewer outfall in HRP's Estuarine Sanctuary (the "CSO") as part of the proposed new pump station. HRPT understands that BPCA is still coordinating with the New York City Department of Environmental Protection ("DEP") regarding the new pump station and below-grade chambers and flood gates associated with the pump station such that the full extent of infrastructure to be built below-grade within HRP may change. HRPT expects that the southern portion of HRP that is currently landscaped with plants and trees will need to be redesigned based on typical DEP restrictions and that such DEP requirements are likely to include limits on planting trees or building permanent structures above and within a buffer zone around the new infrastructure. As previously noted, HRPT requests that BPCA keep HRPT informed so that HRPT can effectively engage with BPCA on the permanent design in this area where the two parks meet.

The Trust appreciates BPCA's efforts to engage the Park's statutorily required Advisory Council (the "AC") about this project. A representative from the AC recently attended the DEIS public hearing to share the group's concerns. Specifically, regarding the pump station infrastructure, the AC requested that BPCA address potential impacts to the Estuarine Sanctuary from the additional flow of stormwater through the CSO from the larger sewer main system. Reducing CSO discharge is an important environmental goal of the federal, state and city governments. If outflow volume is unable to be reduced, the AC has asked that alternatives be considered, such as having the flow be released at a different CSO that is not within the Sanctuary. The planned CSO is located at a point that is surrounded by two bulkhead walls which could result in less dispersion of the stormwater out into the River. HRPT supports the AC's comments and accordingly also requests that potential impacts from the increased outflow and possible mitigation be considered as part of the FEIS.

As HRPT had previously requested, the DEIS qualitatively addresses impacts to bicycle riders on the adjacent Route 9A bikeway and to pedestrians entering the southern end of HRP during construction. Based on the analysis, the DEIS has identified the impacts to pedestrian and bicyclists in the area where the two parks meet as significant and unmitigated during the construction of the Proposed Project (See Chapter 3.11.4 on Construction Impacts and Chapter 4 on Mitigation). As mitigation, BPCA states that bikeway and pedestrian detours will be established through permits issued by New York State Department of Transportation ("NYSDOT") and New York City Department of Transportation ("NYCDOT"). To the extent that detours are proposed on or touching HRP property, HRPT will also need to approve through its construction permit. HRPT requests that BPCA consult with HRPT early in the process and in coordination with the transportation agencies regarding the location, size and design of the proposed detours. It is important that HRPT be involved in decisions on how the public will have access to the southern portion of HRP. HRPT has historically worked well with NYSDOT and NYCDOT on such planning prior to mitigation measures being included in the required NYSDOT permits.

Further, HRPT reminds BPCA that the City of New York installed a commemorative plaque honoring the two Americans whose lives were lost in the terrorism attack that occurred on October 31, 2017 in the landscaped portion of the southeastern border of HRP right next to the Route 9A bikeway. HRPT, New York City, the Belgium and Argentinian Embassies along with members of the Department of Justice and FBI hold an annual memorial procession each October 31st to remember the victims of this horrific crime. The memorial procession along the Route 9A bikeway begins at Houston Street and ends adjacent to Stuyvesant High School with stops at each of the three locations where plaques have been installed to honor the Belgium, Argentinian and American victims. The DEIS does not directly address this important consideration, neither the construction activity on the site nor the operational impact to the annual procession. HRPT knows that BPCA is aware of the sensitivity of this site and that it has flagged this issue for the design teams. HRPT strongly suggest that BPCA reach out to the

families as well as to New York City and HRPT to address plans for this area both related to construction and permanent design.

HRPT's Comments regarding Design and Construction Impacts on the Water Portion of Hudson River Park

The Proposed Project also involves construction of permanent infrastructure within and over the Estuarine Sanctuary, increasing platform coverage into the Sanctuary and reducing HRPT's ability to use a portion of that water area for park purposes, such as boating. While HRPT agrees that the expansion would create a wider pedestrian area and would improve the connection between the two parks, the Proposed Project still results in a permanent impact to the water portion of HRP.

As requested by HRPT, the DEIS does address the multitude of uses at Piers 25 and 26 that may be impacted during construction in Reach 2. HRPT appreciates BPCA's recognition of the public and commercial uses in this area that include beach volleyball and minigolf, non-motorized boating, children's playgrounds, restaurants, marine uses and an upland basketball court and a skatepark. However, the DEIS is unclear on the potential economic impacts of these uses during the Proposed Project's construction. For example, the DEIS states that most of the moorings in the Pier 25 Marina would be temporarily inaccessible during construction of Reach 2 for an approximate 35 months (Chapter 3.11.1, Construction Overview). HRPT and the operators of various businesses will need more clarity on the extent and timing of this construction in order to make important business and operational decisions. For example, if construction is expected to begin in fourth quarter 2025, a key question is whether the moorings south of Pier 25 will be able to operate during the full 2025 season which ends in November. A second question is whether the construction work would impact the transportation vessel operated by Citigroup, or other vessels that use the town dock at Pier 25. Grand Banks, a historic vessel with a food concession, is also located on the southwest side of Pier 25 and may be impacted due to noise and visual impacts during construction. Accordingly, HRPT requests that BPCA commence consulting with us and potentially with all impacted HRP tenants so that the economic impact to the Pier 25 businesses and HRPT along with possible mitigation are considered during the permitting discussions between HRPT and BPCA.

Summary

In sum, HRPT appreciates the many meetings BPCA has scheduled to keep HRPT up to date on project planning and to hear the Trust's concerns. Overall, HRPT believes the DEIS addresses impacts to HRP during construction and operation of the Proposed Project and understands that certain details cannot yet be communicated until BPCA's design and construction plans are further progressed. Two areas that could be addressed however in the FEIS as recommended above includes the potential impacts to the area where two terrorism attack victims are

remembered inclusive of consideration of the October 31st annual memorial procession, and the additional rainwater and sewer flow into the CSO and Estuarine Sanctuary resulting from the new proposed pump station.

HRPT acknowledges that some of the concerns it has raised above and in earlier meetings are best addressed as part of the final design and permitting processes. First, as noted above, HRPT requests to be engaged in the detour plans for the adjacent bikeway and pedestrian accessways when BPCA seeks permits with NYSDOT; HRPT requests to be engaged when BPCA learns of the DEP requirements for the new proposed pump station, particularly as related to the infrastructure to be located in HRP; and HRPT requests to be engaged in the final designs related to the expanded walkway connecting the two parks. Second, plans for long term maintenance and compensation related to BPCA's encroachment into HRP must be addressed in the future easement to be issued by New York State and the construction permit to be issued by HRPT. As BPCA expects to begin construction in late 2025, it is important that the engagement and negotiations begin now so that the permits with planned mitigation that protect HRP are all in place in a timely manner.

HRPT appreciates BPCA's ongoing partnership and looks forward to continuing to work together on this project and others.

Sincerely,

A handwritten signature in brown ink, appearing to read 'Robert Atterbury', with a long horizontal flourish extending to the right.

Robert Atterbury
EVP Park Relationships and Programs

Cc: HRPT Board of Directors
Noreen Doyle
Christine Fazio
Kim Quinones
Rob Rodriguez
Kevin Quinn
Robert Nguyen



Board & Officers

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Tom Fox
Michael S. Gruen
Suzanne Johnson
Michael Kwartler
Juan Rivero
Frank Sanchis
John Shapiro
Bruce H. Simon
John West

North/West Battery Park City Resiliency Project Environmental Impact Statement (DEIS) October 4, 2024

The City Club of New York, founded in 1893, is one of the oldest civic organizations in New York City. From the beginning, its mission has been to promote sound urban policy and protect the city's essential character. The City Club serves as a member of the executive committee of the Hudson River Park Advisory Council. We are concerned that the DEIS for the North/West Resiliency Battery Park City (BPC) Resiliency Plan fails to adequately assess the project's impact on water quality in the New York State Department of Environmental Conservation's designated estuarine sanctuary within the Hudson River Park.

The North/West BPC Resiliency Project team presented the proposed plan at 30% design to the Hudson River Park Advisory Council on September 12, 2023. As then proposed, the plan had significant above-ground impacts on the Hudson River Park. The BPC team responded well to the concerns raised by the Advisory Council members and eliminated the proposed incursions into the park.

However, at the June 11th, 2024 Advisory Council presentation of the 60% completed plan North/West BPC Resiliency Project, team members noted that interior drainage modeling required the addition of a new pumping station because rainwater ponding in Battery Park City would exceed a 1-foot level set by the Federal Emergency Management Administration's (FEMA's) flood insurance rate maps (FIRM).

The BPC team stated that a subsurface pumping station would be constructed under the esplanade between Stuyvesant High School and Route 9A. Surface rainwater

from Battery Park City would be pumped to the existing Combined Sewer Outfall (CSO NMN—073) under the Hudson River Park Esplanade between Pier 25 and the northern bulkhead of Battery Park City.

Figure 3.7-3 in the DEIS indicates that this CSO NMN-073 is currently connected to the opposite side of Route 9A with minimal stormwater input from Battery Park City. Therefore, the proposed plan to pump untreated stormwater from Battery Park City to this CSO will result in an increase in water pollution in the estuarine sanctuary. These concerns were brought to the team's attention during their June 11 briefing with the Advisory Council, **yet the DEIS fails to acknowledge or address the potential impacts of this element of the revised resiliency plan.**

At the June 11th Advisory Committee meeting, the BPC team stated that the design of the pumping station was not complete and that the design of this element would lag other aspects of the resiliency plan and would be presented to the public later (see Attachment 1). **Have the impacts of this pumping station on the Hudson River Park Estuarine Sanctuary been studied as part of the DEIS for the overall project? If not, any separate assessment of the pumping station's impact outside the DEIS for this project would result in segmentation.**

The DEIS draft scope October 19, 2022, §3.2.3 states that the project will require federal approvals, including U.S. Army Corp of Engineers permits or authorization for activities in the waters of the United States (§404 of the Clean Water Act and §10 of the Rivers and Harbors Act) with coordination with the U.S. Fish and Wildlife Service and National Marine Fisheries (among others) to advise the agency regarding activities that affect wetlands, water quality, protected plant and wildlife species, and essential fish habitat.

State approvals require the New York State Department of Environmental Conservation permits related to activities in tidal wetlands and adjacent areas (Article 25) or protection of waters (Article 15), including underwater land adjacent to the North Esplanade, and permits related to the State Pollution Discharge Elimination System (SPEDS) program. The assessment of water and infrastructure impacts does not appear to include the impacts of increased water pollution in the Hudson River Park Estuarine Sanctuary.

During the September 18, 2024 public meeting, the North/West BPC Resiliency Project team described how the impact of new piles required for the project was reviewed and approved, but little was said about the

studies that were done to assess the impact of untreated surface stormwater being pumped directly into the Hudson River Park estuarine sanctuary.

The estuarine sanctuary was established in 1998 and comprises 70% of the park. The City Club objects to the disposal of untreated surface water into the Hudson River Park estuarine sanctuary. Several other options should be reviewed and assessed.

The project should seek to maximize the use of green infrastructure mentioned at the end of Section 3.7.6.2 "Additionally, green infrastructure measures are proposed The GI measures would include vegetated practices such as standard and high-performance rain gardens and non-vegetated practices such as hydrodynamic separators and porous pavers to reduce imperviousness, reduce peak flows, and provide some pretreatment of runoff."

It should also include "cloudburst" infrastructure that retains rainwater, such as sunken skate parks, basketball and tennis courts, to further reduce stormwater runoff before it is routed to a sewer system. The City has recently begun to implement these infrastructure improvements.

<https://www.nyc.gov/office-of-the-mayor/news/681-24/mayor-adams-next-generation-new-york-city-s-investments-flood-prevention-and#/0>.

All new roadway and sidewalk construction in Battery Park City should use porous surfaces, such as those currently being used by the City to further reduce stormwater ponding. Impervious roadway surfaces and sidewalks in Battery Park City should be replaced with porous surfaces as NYC Department of Transportation is now working on the City's roadways.

https://www.nytimes.com/2024/09/23/nyregion/street-wars-flooding-pavement-porous.html?te=1&nl=new-york-today&emc=edit_ur_20240929.

The impacts studied in Section 3.7 are focused on the impacts to the water and sewer system but fail to describe the impact on water quality in the Estuarine Sanctuary. To eliminate those impacts we believe that a stormwater holding system like the one installed at Paerdegat Basin in Brooklyn by the NYC Department of Environmental Protection should be added to the project scope.

A large pipe under the Battery Park City esplanade could store any excess stormwater not captured by cloudburst infrastructure or drained through

porous roadways and sidewalks during storm events. That stormwater could then be slowly released into the Interceptor Line to be treated at the Newtown Creek wastewater treatment plant when the rain event is over, and the plant is operating at its normal capacity.

If the stormwater can't be retained on Battery Park City property or stored in a holding facility for treatment later, alternative off-site disposal mechanisms should be used. There are four existing sewer lines that terminate in the western bulkhead of Battery Park City into the main flow of the Hudson River (Figure 3.7-3 in DEIS). MNM-583 is on Chambers Street, one block south of the proposed pumping station. It could be used to evacuate any residual rainwater that surface modifications within Battery Park City fail to capture.

The DEIS states a separate stormwater sewer system will be installed under the widened North Esplanade. That new stormwater sewage line will terminate at the western bulkhead of Battery Park City. It could route rainwater from the new pumping station directly into the main flow of the Hudson River rather than into Hudson River Park's estuarine sanctuary.

The current proposal is particularly troubling given that the embayment between Pier 25 and Battery Park City has little circulation and existing sailboat anchorages. In addition to impacts on the protected marine habitat, the untreated stormwater could present health hazards for sailors rowing out to their sailboat moorings. If the stormwater is pumped into the estuarine sanctuary on an incoming tide, it could impact kayakers using the Downtown Boathouse at adjacent Pier 26, and the oyster restoration project the Hudson River Park Trust (HRPT) and the Billion Oyster Project (BOP) have established and are actively monitoring between Piers 26 and 34.

Section 3.5.2.4 states that the implementation of green infrastructure would minimize the impact of stormwater runoff on water quality and aquatic resources. However, the analysis appears to exclude mention of stormwater runoff being pumped into the estuarine sanctuary. §3.5.2.5 of the DEIS states that the project, "would not have significant adverse impacts to aquatic biota, water quality, or sediment quality, it would not result in any significant adverse impacts to aquatic habitat, including those associated with the designated Essential Fish Habitat (EFH), or defining characteristics the lower Hudson reach Significant Coastal Fish and Wildlife Habitat (SFWH) or the Hudson River Park Estuarine Sanctuary."

The planned pumping station is rated at 60 million gallons/day. The SEQRA/CEQR Analysis that highlighted post-construction impacts presented at the public meeting on September 18th indicated that the effects of the proposed pumping station on water and sewer infrastructure had received a detailed analysis and there would be no significant impacts (see Attachment 2). Did that include the water quality impacts of pumping untreated surface water from BPC into the estuarine sanctuary? If so, the technical information that the North/West BPC Resiliency Project provided to the NYS Department of Environmental Conservation for their assessment and approval must be shared with the public.

What volume of water is expected to be pumped into the sanctuary, and for how long? How often is this activity expected to occur? During what times of the year will the pumping occur? How were the potential impacts on habitat and in-water recreational uses such as kayaking at Pier 26 or on the estuary restoration efforts the Hudson River Park Trust/Billion Oyster Project restoration program between Piers 26 and 34 studied?

Section 3.5.7.9 speaks to the impact of in-water construction of the seawall elements on the Hudson River. It does not appear to assess the long-term effects of untreated surface wastewater pumped directly into the Hudson River Park Estuarine Sanctuary.

The City Club, Hudson River Park Advisory Council, Community Boards 1 and 2, and all the elected officials on Manhattan's West side have requested that the US Army Corps of Engineers develop a more comprehensive approach to resiliency in Hudson River Park as an alternative to a 12-foot wall from Battery Park City to West 36th Street, which was included in their Harbor and Tributaries Study (HATS) proposals.

All resiliency projects on Manhattan's West Side, including the North/West Battery Park City Resiliency Project, should reduce stormwater runoff into the Hudson River Park Estuarine Sanctuary during storm events using surface retention, porous pavement or routing the water to storage facilities during the rain event. The water can then be slowly fed into an adjacent interceptor sewer to be treated at the appropriate wastewater treatment facility, after the rain event and before it is released into our city's waterways.

The impacts of the planned pumping station on the water, wildlife and users of the Hudson River Park Estuarine Sanctuary should be assessed, and mitigation proposed and assessed in the FEIS, before the North/West Battery Park City Resiliency Project receives final approval.

Sincerely,



Kent Barwick
Chairman



Layla Law-Gisiko
President

CC:
Billion Oyster Project
Congressman Dan Goldman
Councilmember Christopher Marte
Downtown Boathouse
Environmental Conservation Committee
Hudson River Park Trust NYC
Hudson River Park Trust Advisory Council
Manhattan Community Board 1
Manhattan Youth and Recreation
NYS Assemblymember Charles D. Fall
NYS Assemblymember Deborah Glick
NYS Assemblymember Grace Lee
NYS Senator Brian Kavanaugh
US Army Corp. of Engineers

Attachment 1

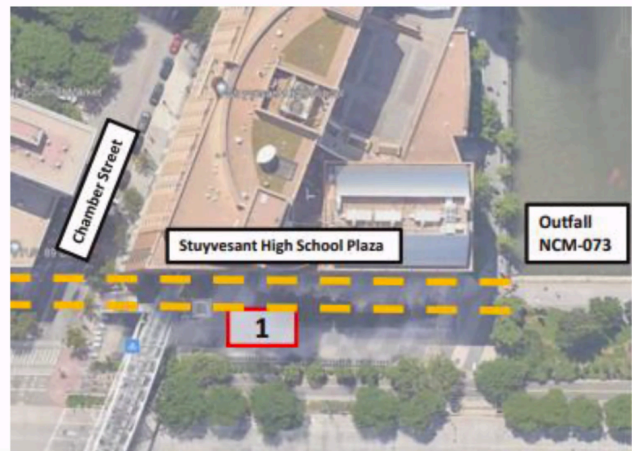
Pump Station (separate design timeline)

Two main drainage objectives:

- **1. Isolate the protected area** such that floodwater is prevented from entering through existing sewer connections during coastal storm surges.
- **2. Manage interior flooding** within the project's protected area associated with a coincident coastal storm surge and rainfall event to minimize interior flooding.

Most pump station infrastructure expected to be below-grade.

Separate design timeline to be provided.



Attachment 2

DEIS IMPACT ANALYSES SUMMARY

Post-Construction (Operational, Screened)

- ✓ Socioeconomics
- ✓ Community Facilities
- ✓ Shadows
- ✓ Solid Waste and Sanitation Services
- ✓ Energy
- ✓ Air Quality
- ✓ Noise and Vibration
- ✓ Public Health

Post-Construction (Operational, Detailed Analysis)

- ✓ Land Use and Public Policy
- ✓ Open Space
- ✓ Hazardous and Contaminated Materials
- ✓ Water and Sewer Infrastructure
- ✓ Transportation
- ✓ Greenhouse Gas Emissions (GHG) and Climate Change
- ✓ Historic and Archaeological Resources
- ✓ Urban Design and Visual Resources
- ✓ Natural Resources
- ✓ Neighborhood Character

During Construction

- ⓘ Open Space closures
- ⓘ Transportation (traffic and pedestrians)
- ✓ Air Quality emissions
- ⓘ Noise emissions
- ✓ Natural Resources
- ⓘ Neighborhood Character

- ✓ **No Significant Adverse Impact**
- ⓘ **Temporary Significant Adverse Impact**



October 29, 2024

Via E-Mail to nwbpcrinfo@bpca.ny.gov

Claudia Filomena
Battery Park City Authority
200 Liberty Street, 24th Floor
New York, NY 10281
att: North/West BPC Resiliency Project Team

**RE: Alternatives to Combined Sewer Discharges from
North/West Battery Park City Resiliency Project**

Dear Ms. Filomena:

Riverkeeper, Inc. (“Riverkeeper”) respectfully submits the following comments on the Battery Park City Authority’s (“BPCA”) Draft Environmental Impact Statement (“DEIS”) for the North/West Battery Park City Resiliency Project (“BPCRP”). Riverkeeper strongly supports onshore storm surge and flooding protections for New York City like the proposed BPCRP. However, we are concerned that the project as designed would pump collected stormwater drainage into the existing combined sewer system that discharges combined sewer overflows (“CSOs”) to the Hudson River Park Estuarine Sanctuary.¹

Riverkeeper is a member-supported watchdog organization dedicated to protecting and restoring the Hudson River from source to sea and safeguarding drinking water supplies through advocacy rooted in community partnerships, science, and law. For more than 50 years, Riverkeeper has defended the Hudson River Estuary, its fisheries, and the entire Hudson River ecosystem. We have stopped polluters, championed public access to the river, influenced land use decisions, and restored habitat, benefiting the natural and human communities of the Hudson River and its watershed. We have a seat on the Hudson River Park Technical Advisory Committee and helped develop the Estuarine Sanctuary Management Plan Action Agenda.

¹ NORTH/WEST BATTERY PARK CITY RESILIENCY PROJECT, DRAFT ENVIRONMENTAL IMPACT STATEMENT PROJECT DESCRIPTION 1-19 (Aug. 2024) [hereinafter PROJECT DESCRIPTION], https://media.bpca.ny.gov/wp-content/uploads/2024/08/28173645/1.0_Project-Description.pdf.

If the BPCRP moves forward, the BPCA is required to modify the existing drainage infrastructure in order to meet the Federal Emergency Management Agency flood protection certification requirements.² To accomplish this, BPCA proposes to construct a 60 million gallon per day pump station to pump drainage to Combined Sewer Outfall NC-073 during storm events.³

In the combined sewer system, sanitary wastewater from homes and businesses are collected in the same conveyance system as storm runoff from sidewalks, streets and private properties.⁴ When there is heavy rainfall, wastewater and stormwater exceed the capacity of the system, resulting in discharges of excess wastewater, known as CSOs, into the Hudson River.⁵ These CSOs impair water quality; they contain untreated human waste, ammonia, pesticides, petroleum products, toxins, and pathogenic microorganisms.⁶ The Hudson River Park Estuarine Sanctuary provides critical habitat to over eighty-five species of fish, and is also a vital migration corridor for birds and other wildlife.⁷ Ongoing CSOs put the health of this ecosystem in danger.

Currently, outfalls NC-072 and NC-073 discharge combined sewer overflow directly into the Hudson River.⁸ NC-072 discharges roughly 5 million gallons per year to North Cove Marina. Such discharges occur 19 times per year and are triggered by 0.57 inches of rainfall. Similarly, NC-073 discharges roughly 20 million gallons per year to the Hudson River Park Estuarine Sanctuary just north of Battery Park City at Harrison Street. These discharges occur 27 times per year and are triggered by 0.5 inches of rainfall.⁹

Although the DEIS concludes that there will be no overall volumetric increase in stormwater entering the city's sewer system,¹⁰ it is unclear whether the project will cause any change in discharges from either of these outfalls, and to what degree. We are concerned that the new pump station capacity could potentially discharge in a *single day* the equivalent three times the current *yearly* discharge from outfall NC-073. Therefore, we urge BPCA to identify in the final environmental impact statement what volumetric changes in discharges from each outfall might occur. Any increased CSO discharges could have significant impacts on local waters, especially where there is an embayment that is sheltered from tidal flushing, such as between the

² NORTH/WEST BATTERY PARK CITY RESILIENCY PROJECT, DRAFT ENVIRONMENTAL IMPACT STATEMENT, WATER AND SEWER INFRASTRUCTURE 3.7-5 (Aug. 2024) [hereinafter WATER AND SEWER INFRASTRUCTURE], https://media.bPCA.ny.gov/wp-content/uploads/2024/08/28162923/3.7_Water_and_Sewer_Infrastructure.pdf.

³ *Id.* at 3.7-7.

⁴ *Combined Sewage Overflows (CSOs)*, RIVERKEEPER, <https://www.riverkeeper.org/campaigns/stop-polluters/sewage-contamination/cso/#:~:text=More%20than%2027%20billion%20gallons,York%20Harbor%20alone%20each%20year> (last visited Oct. 17, 2024).

⁵ *Id.*

⁶ *Id.*

⁷ *River Sanctuary*, HUDSON RIVER PARK, <https://hudsonriverpark.org/the-park/river-sanctuary/> (last visited Oct. 17, 2024).

⁸ Open Sewer Atlas NYC, *New York City CSO - Combined Sewer Overflow*, TUMBLR, <https://openseweratlas.tumblr.com/wetweathermap> (last visited Oct. 28, 2024).

⁹ *Id.*

¹⁰ WATER AND SEWER INFRASTRUCTURE, *supra* note 2, at 3.7-8.

northern portion of Battery Park and Pier 25 or in the North Cove Marina. These embayments have low circulation, which compounds the effects of CSOs.

Riverkeeper also urges BPCA to consider alternative solutions instead of directing drainage to the Estuarine Sanctuary through the CSO system. One solution would be to connect the pump station to the separate sewer system to reduce or eliminate the CSO discharges to the area. While the polluted stormwater should still be treated to remove pollutants, such a modification to the plan would reduce the CSO discharges to the Estuarine Sanctuary.

In addition while we appreciate that the BPCRP will incorporate a significant amount of green infrastructure and impervious pavement,¹¹ we urge you to fully consider additional green and gray infrastructure proposed in the City Club's comment letter dated October 4, 2024.¹² The City Club's prudent requests include cloudburst infrastructure, such as sunken park amenities to capture and hold stormwater, porous surfaces to allow for infiltration, and detention tanks to prevent or slow runoff from entering the CSO system. These infrastructure improvements, taken together or separately, would improve water quality in the estuarine sanctuary in perpetuity.

Thank you for your consideration of our comments.

Sincerely,



Casey Hellman

Legal Fellow*

Riverkeeper, Inc.

*Bar admission pending

Cc (via email):

Noreen Doyle, President, Hudson River Park Trust

¹¹ PROJECT DESCRIPTION, *supra* note 1, at 1-14 to 1-18.

¹² Memorandum from Kent Barwick, Chairman, and Layla Law-Gisiko, President, The City Club of New York, North/West Battery Park City Resiliency Project Environmental Impact Statement (DEIS) (Oct. 4, 2024).