

## Member Organizations

Brooklyn Legal Services, Inc.  
Brooklyn Lighthouse Comm. Church  
Choir Angelus  
Church of the Ascension  
Congregation Ahavas Israel  
Dupont Street Senior HDFC  
Friends of Newtown Creek Barge  
Terminal Playground  
GCU Lodge #1  
Green Oaks  
Greenpoint Ave/West St Block Assoc  
Greenpoint Civic Council  
Greenpoint Property Owners Assoc  
Greenpoint Reformed Church  
Greenpoint Renaissance Society  
Greenpoint Video Project  
Greenpoint/Williamsburg Youth  
Soccer League  
Huron Street Block Association  
Ind. Friends of McCarren Park, Inc.  
India Street Block Assoc.  
John Smolenski Memorial Dem Club  
Neighbors Against Garbage  
North Brooklyn Development Corp  
North Brooklyn Greens  
North Greenpoint Neighbors for  
Environmental Justice  
Oak Street Block Association  
Our Lady of Mt. Carmel Church  
Park Moms  
People's Firehouse  
Polish American Folk Dance Co.  
Polish National Home  
Polish Veterans Ladies Auxiliary  
Polonia Technica  
P.S.C. Community Services, Inc.  
River Charter School  
St. Anthony/St. Alphonsas Church  
St. John's Lutheran Church  
Stop the Barge  
Sybiracy  
Vincent DePaul Society/St. Anthony's  
of Padua  
Watchperson Project  
WaterWays and Green Views

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## COMMENTS TO THE COMPREHENSIVE SOLID WASTE MANAGEMENT PLAN SCOPE FOR THE PROPOSED GREENPOINT CONVERTED MARINE TRANSFER STATION AND BROOKLYN/QUEENS ALTERNATIVES

July 1, 2004

The Greenpoint Waterfront Association for Parks & Planning ("GWAPP"), a New York and IRS §501(c)(3) not-for-profit corporation, is a coalition of over 40 local religious institutions, community organizations and advocacy groups dedicated to improving the quality of life for all the residents of North Brooklyn by fostering the creation of open space and ensuring the sound environmental management of the area's industrial waterfront. Founded in 2000, GWAPP has effectively advocated on behalf of the waterfront and open space areas of Greenpoint and Williamsburg. Its work has included defeating major power generation projects, open space planning for the proposed rezoning of the community's East River waterfront and implementing and enforcing the New Waterfront Revitalization Plan ("NWRP") for Greenpoint/Williamsburg's multi-use waterfront area.

GWAPP submits the following comments in response to the Draft Scope of work proposed for the Comprehensive Solid Waste Management Plan ("SWMP") as it applies to the Greenpoint Marine Transfer Station ("MTS") and possible alternatives along the Newtown Creek Significant Maritime Industrial Area ("SMIA") under the NWRP (the "proposed action"). In submitting these comments, GWAPP believes that the SWMP will only be successful if it helps to significantly reduce the number of land-based transfer stations in Greenpoint/Williamsburg, permanently reduces the total amount of waste currently processed in Greenpoint/Williamsburg, moves the City's boroughs, especially Manhattan, towards self-sufficiency in disposing of its own residential and commercial waste, and recognizes that the Greenpoint MTS is poorly sited to meet the goals and objectives of the proposed SWMP.

### 1. The DEIS Must Re-Analyze Commercial Waste Because It Has An Adverse Environmental Impact On The Communities of Greenpoint/ Williamsburg

As a base-line issue, the DEIS must re-analyze the effects of commercial waste processing on Greenpoint/Williamsburg. The current commercial waste study is fundamentally flawed when it finds that transfer stations do not have an adverse environmental impact on local residential communities. Unless the draft scope includes a provision to re-study the adverse impacts of commercial waste transfer processing, and acknowledges the adverse impact as a base assumption of the SWMP, any further

work will not be acceptable. Moreover, GWAPP believes that incorporating the current commercial waste study in the work going forward will open the DEIS subject to legal challenge.

## **2. Analysis of Alternatives Must Include On/Off Ramps in Queens and Brooklyn for The Kosciusko Bridge Reconstruction**

As part of an EIS, the applicant must analyze the proposed action in the context of announced plans. The New York State Department of Transportation has announced plans to re-construct the Kosciusko Bridge by which the Brooklyn-Queens Expressway straddles the Newtown Creek. Alternatives for that project should include on-off ramps in Brooklyn and Queens to provide commercial traffic access to both sides of the Newtown Creek SMIA to enable direct access to transfer stations in the affected areas and, therefore, limit the impacts of trucks traversing into residential areas. These ramps will allow more efficient access to the Newtown Creek SMIA for commercial traffic without entering residential areas. The DEIS should include an analysis of the traffic impacts on Greenpoint and Williamsburg for the Greenpoint MTS and the proposed alternative sites with on/off ramps servicing both the Brooklyn and Queens sides of the Newtown Creek SMIA.

## **3. Traffic Impacts Must Analyze Best Alternatives For Eliminating Truck Traffic in Residential Areas and Keeping It Within the SMIA**

As part of the DEIS, the applicant will analyze the proposed action in terms of its consistency with the NWRP. The NWRP will permit the proposed action because the Greenpoint MTS and the proposed alternatives are all located in the Newtown Creek SMIA where such activities can occur as-of-right under the NWRP. In the event that on-off ramps are not included in the Kosciusko Bridge reconstruction, the DEIS analysis of the NWRP should determine whether the Greenpoint MTS or the other proposed alternative more effectively consolidates commercial truck traffic in the Newtown Creek SMIA and thereby avoid residential areas. The location that will best consolidate commercial truck traffic and eliminate it from residential areas should be recommended as the preferred location.

## **4. The DEIS Must Study Borough Self-sufficiency**

The key to a fair and equitable SWMP will only be achieved with each borough handling the waste that it generates. The DEIS must study how borough self-sufficiency can be achieved for both residential and commercial garbage. This must include studying the effects of 100% recycling for Manhattan commercial waste. In addition, the DEIS should also study an equity fund directly benefiting communities that handle commercial and residential waste that are processed from other boroughs.

## **5. The DEIS Must Study MTS Construction Offsetting and Eliminating Commercial Permitting and Processing**

GWAPP supports encouraging the creation of marine and rail transfer links to remove waste from New York City because it will reduce the amount of long-haul trucking and unacceptable land-based transfer stations. The DEIS must analyze effects of closing land-based transfer stations on a one-to-one offset ratio basis for any additional waste processing proposed to come through the Greenpoint MTS or any of the alternatives as a result of the proposed action.

In addition, the DEIS must assure that (1) the utilization amounts under the proposed action are reduced from the amount of waste processing occurring at currently permitted facilities in Greenpoint/Williamsburg, (2) that there is a permanent moratorium on permitting new transfer station facilities in Greenpoint/Williamsburg and (3) that the permitted levels of existing in Greenpoint/ Williamsburg waste transfer facilities are reduced to their current level of utilization and further reduced by the recommended offset from the utilization of the proposed action or any alternatives.

**6. The DEIS Must Study the Overall Traffic Impacts of the Proposed Action and the Proposed Comprehensive Rezoning of the Greenpoint/Williamsburg Waterfront and Inland Areas**

The DEIS must take into account all announced plans. The New York City Department of City Planning has proposed the comprehensive rezoning of the Greenpoint/Williamsburg waterfront.

DCP projects that the rezoning will create over eight thousand new units of housing and seventeen thousand new residents in the affected areas over the next ten years. The bulk of this housing is projected to occur in along the Greenpoint waterfront in close proximity to a major point of ingress and egress into the local area. The DEIS must analyze the impacts of the proposed converted MTS in Greenpoint in light of the projected increases of traffic resulting from the proposed rezoning and compare the cumulative impacts to the proposed action alternatives.

GWAPP wants to thank you for the opportunity to provide these comments to the draft scope of work. If you have any comments or question regarding this matter, please do not hesitate to contact us through Joseph Vance at (718) 383-1278.