

Gateway National Recreation Area  
New York, New Jersey

U.S. Department of the Interior  
National Park Service



# Replace Park Dispatch Center

*GATEWAY NATIONAL RECREATION AREA,  
STATEN ISLAND UNIT, NEW YORK*



ENVIRONMENTAL ASSESSMENT

May 2015



**United States Department of the Interior National Park Service  
Gateway National Recreation Area, Staten Island Unit, New York**

**Replace Park Dispatch Center  
Environmental Assessment**

**May 2015**

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The National Park Service (NPS) is proposing to build a new, permanent, state-of-the-art dispatch center at the park headquarters building (Building 210) at Fort Wadsworth, including a new 100-foot-above ground level (AGL) radio tower and backup generator. This dispatch center also would have the capacity to support the dispatch functions of the US Park Police and potentially the Statue of Liberty National Monument. Hurricane Sandy destroyed the Gateway National Recreation Area's (NRA) dispatch center in the park's Sandy Hook unit in New Jersey. The proposed relocation site is located above the floodplain at Fort Wadsworth in the park's Staten Island unit in New York. The radio tower would be a free-standing monopole and the backup generator would have a masonry enclosure around it. There would also be two heat pumps and a condenser unit enclosed by a chain link fence.

Action is needed at this time because Hurricane Sandy destroyed the Gateway Dispatch Center located at Sandy Hook. A temporary dispatch center was relocated to higher ground at Fort Wadsworth in Building 220, but it is inadequate for long-term use. A secured location with updated systems is needed. The US Park Police also need a resilient dispatch center because their current location at Floyd Bennett Field, while unharmed by Hurricane Sandy, may be vulnerable to future storms. A resilient location that consolidates park dispatch functions with the US Park Police and will create more efficient operations during emergency events is needed. The center also needs to allow for the potential future consolidation with dispatch services from the Statue of Liberty National Monument, as the Ellis Island communication center lacks full dispatch capabilities.

NPS prepared an environmental assessment (EA) to evaluate alternatives for replacing the dispatch center, describe the environment that would be affected by the alternatives, and assess the environmental consequences of implementing the alternatives. This EA examines two alternatives: a no-action alternative (alternative 1) and replacement of the dispatch center in Building 210 on Fort Wadsworth (alternative 2). Alternative 2 was identified as the NPS preferred alternative because it best meets the project's purpose of and need for action while protecting natural and cultural resources to the greatest extent practical. Implementation of the NPS preferred alternative could result in impacts on historic districts and cultural landscapes, as well as visitor use and experience.

This document has been prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA); regulations of the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations 1500–1508); and NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making* (DO-12) (NPS 2011) and accompanying DO-12 Handbook (2001).

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**Note to Reviewers and Respondents:**

If you wish to comment on this EA, you may mail comments within 30 days to the address below or you may post them electronically at <http://parkplanning.nps.gov/gate>. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly

available at any time. While you can ask in your comment to withhold your personal identifying information from public review, NPS cannot guarantee that it will be able to do so.

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## APPENDICES

Appendix A: Federal Consistency Determination

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# **CHAPTER 1: PURPOSE AND NEED**

## **INTRODUCTION**

The National Park Service (NPS) is proposing to build a new, permanent, state-of-the-art dispatch center at the park headquarters building (Building 210) at Fort Wadsworth, including a new 100-foot-above ground level (AGL) radio tower and backup generator. This dispatch center also would have the capacity to support the dispatch functions of the US Park Police and potentially the Statue of Liberty National Monument. Hurricane Sandy destroyed the Gateway National Recreation Area's (NRA) dispatch center in the park's Sandy Hook unit in New Jersey. The proposed relocation site is located above the floodplain at Fort Wadsworth in the park's Staten Island unit in New York. A vicinity map of the project area is provided in figures 1 and 2.

This environmental assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, and implementing regulations, 40 Code of Federal Regulations (CFR) Parts 1500–1508, Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making* (DO-12) and the handbook, *Conservation Planning, Environmental Impact Analysis, and Decision-making*. An EA analyzes the proposed action and alternatives and their impacts on the environment.

## **PURPOSE OF THE ACTION**

The purpose of the project is to replace the temporary dispatch center with a new, permanent dispatch center at Gateway NRA at a resilient location. The project will provide sufficient space for an Incident Command Center and future consolidation of the Gateway Dispatch Center with the dispatch functions of the US Park Police and the Statue of Liberty National Monument.

## **NEED FOR THE ACTION**

Hurricane Sandy destroyed the Gateway Dispatch Center located at Sandy Hook. A temporary dispatch center was relocated to higher ground at Fort Wadsworth, but is inadequate for long-term use. A secured location with updated systems is needed. The US Park Police also need a resilient dispatch center because their current location at Floyd Bennett Field, while unharmed by Hurricane Sandy, may be vulnerable to future storms. A resilient location that consolidates park dispatch functions with the US Park Police and will create more efficient operations during emergency events is needed. The center also needs to allow for the potential future consolidation with dispatch services from the Statue of Liberty National Monument, as the Ellis Island communication center lacks full dispatch capabilities.

## **OBJECTIVES IN TAKING ACTION**

“Objectives” are specific purpose statements that describe what must be achieved to a large degree for the action to be considered a success. All of the alternatives selected for detailed analysis must meet project objectives to a large degree and support the purpose of and need for action.

- Ensure that the proposed Gateway Dispatch Center is compatible with long-term plans to consolidate with the dispatch functions of the US Park Police and the Statue of Liberty.
- Build a dispatch center in a suitable location unlikely to be affected by future storm events or climate change.

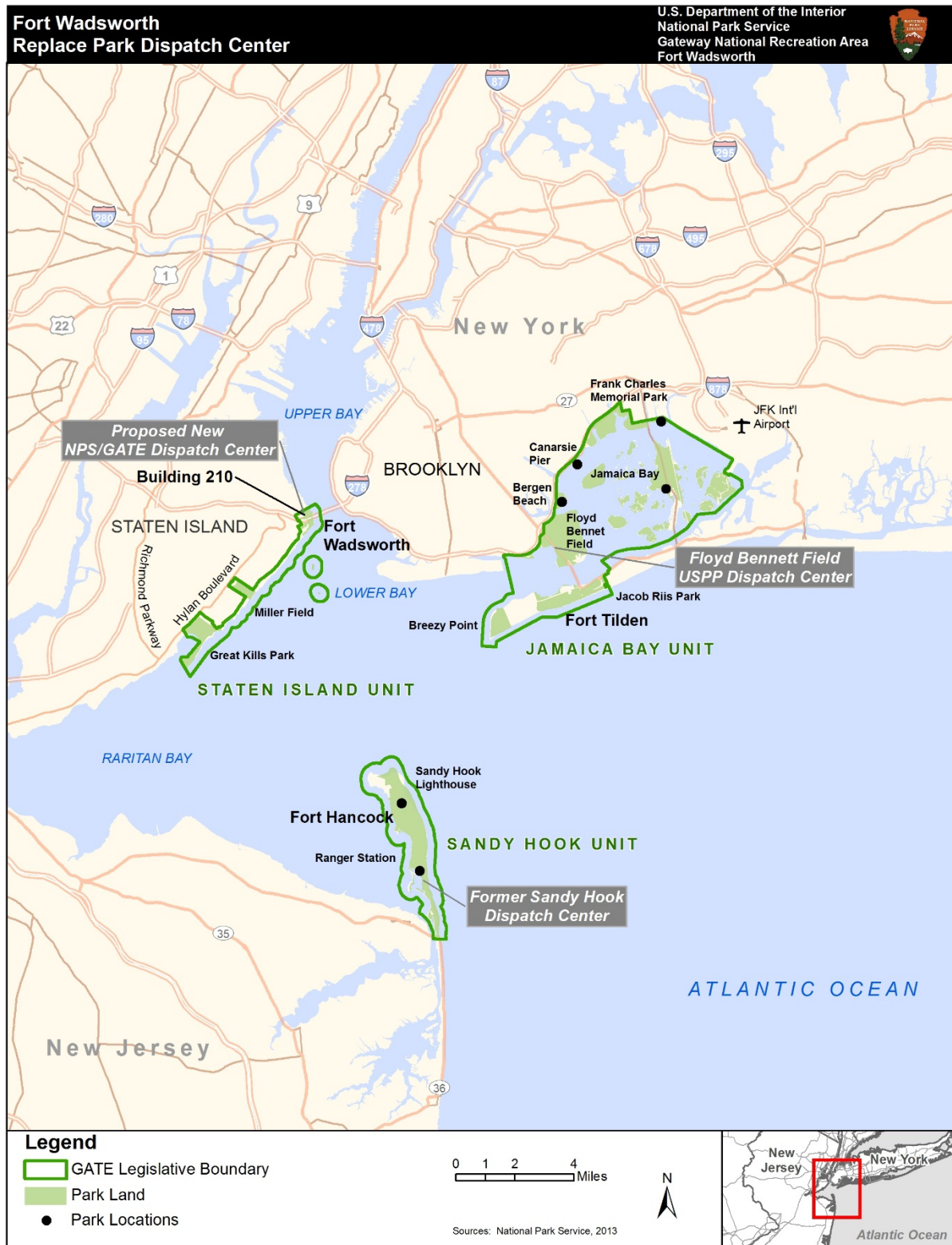


FIGURE 1. REGIONAL OVERVIEW

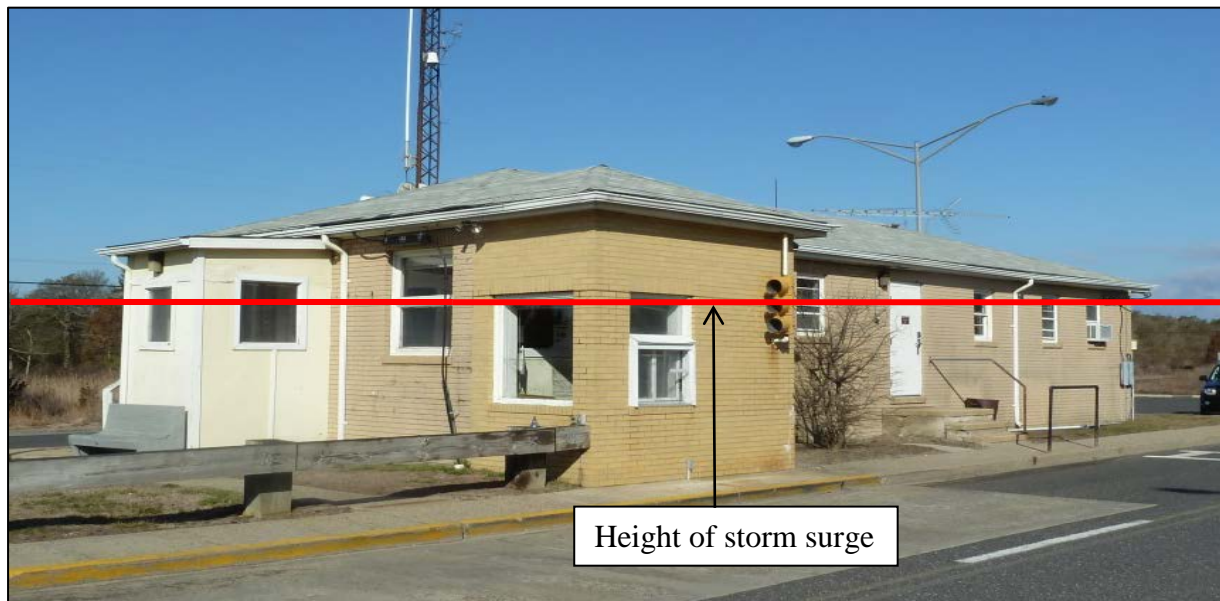


FIGURE 2. FORT WADSWORTH PROJECT AREA—BUILDING 210

- Provide a secure, modern, state-of-the-art dispatch center.
- Provide efficient and resilient emergency consolidation in future events affecting Gateway and New York Harbor Parks.
- Comply with Federal Emergency Management Agency flood-resistant design, the International Existing Building Code building code and wind loads, and the National Fire Protection Association 1221: Standard for the Installation, Maintenance, and Use of Emergency Services Communications Systems.
- Comply with NPS resiliency directives, such as Policy Memorandum 15-1 (Addressing Climate Change and Natural Hazards for Facilities).

## BACKGROUND

Hurricane Sandy, a Category 1 hurricane, made landfall on the New Jersey and New York coasts on October 29, 2012. The hurricane's 58-mile-per-hour winds and storm surge caused substantial damage throughout the area, and the New Jersey-New York coastal areas were declared federal disaster areas in the storm's aftermath. Storm surge from Hurricane Sandy inundated the Gateway NRA's dispatch center in the park's Sandy Hook unit (Building 470, the Ranger Station), New Jersey, and destroyed all of the communication equipment. See figure 3. Dispatch functions were subsequently moved to Building 220 at Fort Wadsworth (see figure 1), which had available space and is above the floodplain.



**FIGURE 3. BUILDING 470—SANDY HOOK DISPATCH CENTER FLOODED BY HURRICANE SANDY**

## **PURPOSE AND SIGNIFICANCE OF THE PARK**

Sparked by environmental and recreational movements of the 1960s, national recreation areas were designed and developed to provide space for a variety of recreational activities, while protecting natural and cultural resources. As specified in the park's enabling legislation from 1972, Gateway NRA was established to "preserve and protect for the use and enjoyment of present and future generations an area possessing outstanding natural and recreational features" (NPS 1972). Gateway NRA was one of the first urban national recreation areas established by NPS (along with Golden Gate NRA). Consisting of approximately 26,000 acres, Gateway NRA includes a mix of developed and undeveloped land and provides a variety of recreational and educational experiences to visitors. Gateway NRA offers urban dwellers opportunities for environmental, historical, educational, and recreational experiences that are not available in the city.

Fort Wadsworth is significant within the national context of coastal defense and specifically for the protection it provided the nation's most important harbor. Coastal defense, or more accurately the defense of vital harbors, has been one of the most persistent and powerful themes of American military history by any measure of effort, expenditure, and emphasis (NPS 1995).

The Fort Wadsworth site represents the evolution in philosophy and technology of coastal fortification systems in the United States from 1794 to 1945 (NPS 1995). Preliminary archeological investigations indicate that portions of Battery Turnbull date as early as the 1840s and possibly as far back as 1808–1810. The fort and site worked with other fortifications in the area, including Fort Hamilton, Castle Clinton, Fort Gibson, Castle Williams, Fort Wood, Fort Hancock, and Fort Tilden. Fort Tompkins and Battery Weed (on the Fort Wadsworth site) are particularly significant because they are remarkably well preserved. The other batteries and support structures at Fort Wadsworth are valuable to explain the interdependence and progression of various firearms and weaponry. Although not considered nationally significant for its association with the Cold War, Fort Wadsworth during this period (1945 to 1994) is important from an interpretive standpoint because it illustrates the changing uses and fate of former coastal defense facilities through the Cold War (NPS 1995).

## **RELATIONSHIP OF THE PROPOSAL TO OTHER PLANNING EFFORTS**

The plans and studies that have informed and led to the development of alternatives for a long-term solution for replacing the dispatch center include the Gateway NRA's general management plan (NPS 2014).

The Gateway NRA's general management plan (NPS 2014) designates management zones to help park staff make decisions about how to care for facilities and other resources. Most of Fort Wadsworth is designated as a Historic Zone. The general management plan provides guidance on managing cultural landscapes and historic settings to maintain the historic scene and to protect and preserve cultural resources and their associated values and characteristics. Views are a character-defining feature of many cultural landscapes and historic settings, and in the Historic Zone, a range of views would be protected to ensure that visitors find opportunities to experience the expansive New York Harbor views from Gateway's defensive and maritime structures. The selection of alternatives for the dispatch center took into account the cultural resources at Fort Wadsworth and in compliance with the general management plan tried to protect and preserve the cultural resources and their associated values and characteristics.

## **ISSUES AND IMPACT TOPICS**

Park staff identified potential impacts associated with the dispatch center replacement during internal scoping. The issues and concerns identified during scoping were grouped into impact topics that are

discussed in “Chapter 3: Affected Environment” and are analyzed in “Chapter 4: Environmental Consequences.”

## **IMPACT TOPICS ANALYZED IN THIS ENVIRONMENTAL ASSESSMENT**

### **Historic Structures and Cultural Landscapes**

Building 210 is located within the Fort Wadsworth Historic District and is a historic structure that is a contributing resource to the historic district. The proposed relocation of the dispatch center to Building 210 along with the construction of a radio tower monopole and placement of a backup generator, heat pumps, and a condenser unit on the outside of the building could impact Building 210, as well as the historic district and its cultural landscape. Therefore, these resources have been included for full analysis in this EA.

### **Visitor Use and Experience**

The proposed radio tower monopole, backup generator, heat pumps, and condenser unit would be located in an area that would be visible to visitors and in an area where views are important to the visitor experience. As a result, impacts on the viewshed and visitor experience have been analyzed in this EA.

## **IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS**

The following impact topics were eliminated from further analysis in this EA. A brief rationale for dismissal is provided for each topic.

### **Public Health and Safety**

The current temporary dispatch center in Building 220 is fully functional with no loss of public safety services or increase in response times, comparable to the Sandy Hook dispatch center prior to Hurricane Sandy. Relocating the dispatch center to Building 210 would not alter these services or response times. While relocation of the dispatch center would provide internal operational efficiencies by incorporating multiple dispatch centers into one location that is collocated with management staff at park headquarters, it would not impact public health or safety. Therefore, public health and safety was dismissed from further analysis.

### **Geology and Soils**

There would be minimal ground-disturbing activities during construction of the radio tower monopole, heat pumps, condenser unit, and the backup generator enclosure. All disturbed soils would be in locations that have previously been disturbed and bedrock is not expected to be encountered while excavating for the radio tower's concrete foundation. The proposed relocation would not impact any unique geological resources, and no geologic hazards have been identified in the project area. As a result, this impact topic was dismissed from further analysis.

### **Vegetation**

Actions directly related to the construction of the radio tower monopole, heat pumps, condenser unit, and the backup generator enclosure would not require clearing or trimming of vegetation or tree removal. No existing rare or unusual vegetation occurs in the project area. Minimal ground disturbance would result in

minor clearing of grass, resulting in negligible impacts. As a result, this resource topic was dismissed from further analysis.

### **Wildlife**

The project area is in an urban setting. As a result, wildlife in the project area is limited to adapted urban species, such as squirrels and songbirds. Construction-related activities may temporarily displace wildlife from the area, but the area already experiences regular vehicle and human disturbance. Design of the radio tower would be in accordance with US Fish and Wildlife (USFWS) guidelines. Guy wires, which can cause injury to birds and bats, would not be used. The radio tower also does not require lights that could impact birds because it would be less than 200 feet tall. Therefore, this resource topic was dismissed from further analysis.

### **Wetlands and Floodplain**

There are no floodplains or wetlands in the project area, therefore these topics were dismissed from further analysis.

### **Hydrology and Water Quality**

Construction of the proposed radio tower monopole, heat pumps, condenser unit, and the backup generator enclosure would not add a substantial amount of impervious surface or impact stormwater runoff patterns. Potential impacts on hydrology and water quality would be negligible. As a result, this impact topic was dismissed from further analysis.

### **Rare, Threatened, and Endangered Species**

No rare, threatened, or endangered species are located in the project area. Therefore, this impact topic was dismissed from further analysis.

### **Archeological Resources**

The Fort Wadsworth Historic District has been determined eligible under Criterion D for archeological sites dating from ca. 1810 – ca. 1875 that are associated with the first, second, third, and fourth systems of coastal defense at Fort Wadsworth. Also within the boundaries of the district is the Fountain-Mouquin site, significant for its data related to the settlement and change from a rural farmstead to a weekend country retreat for affluent urban residents. None of these archeological sites are located in proximity to Building 210 (Lowenthal and Bathurst 1997).

The construction of the concrete pads for the backup generator, heat pumps, and condenser unit, as well as the construction of the foundation for the radio tower monopole would involve some ground disturbance, and based on the most recent archeological report's finding (JMA 2011), the area may be of moderate sensitivity. However, the proximity of the generator pads and the foundation of the radio tower to Building 210 makes it unlikely that it will rest on undisturbed soil. Because this area has likely been disturbed as part of construction related to Building 210, the proposed action is unlikely to impact archeological resources and therefore, this impact topic was dismissed from further analysis.

### **Indian Trust Resources**

Secretarial Order 3175 requires that any anticipated impacts on Indian Trust resources from a proposed project or action by US Department of the Interior agencies be explicitly addressed in environmental

documents. The federal Indian Trust responsibility is a legally enforceable obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal laws with respect to Native American tribes. There are no known Indian Trust resources in the study area, and the lands comprising the park are not held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. Therefore, the impact topic of Indian Trust resources was dismissed from further analysis.

### **Ethnographic Resources and Sacred Sites**

NPS defines ethnographic resources as any “site, structure, object, landscape, or natural resource feature assigned traditional, legendary, religious, subsistence or other significance in the cultural system of a group traditionally associated with it” (NPS 1998). In this analysis, the NPS term “ethnographic resource” is equivalent to the term “Traditional Cultural Property” (TCP), which is more widely used in cultural resource management. Guidance for the identification of ethnographic resources is found in National Register Bulletin 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties* (NPS 1998). The key considerations in identifying TCPs are their association with cultural practices or beliefs of a living community that are rooted in the community’s history and are important in maintaining the continuing cultural identity of the community (NPS 1998). No properties in the project area meet the definition of a TCP; therefore, this impact topic was dismissed from further consideration. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during the implementation of the proposed action, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (25 United States Code 3001) would be followed.

### **Environmental Justice**

On February 11, 1994, President Clinton issued Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.” This order directs agencies to address environmental and human health conditions in minority and low-income communities to avoid the disproportionate placement of any adverse effects from federal policies and actions on these populations. Local residents include low-income populations, but these populations would not be particularly or disproportionately affected by activities associated with the dispatch relocation; therefore, this impact topic was dismissed from further analysis in this EA.

### **Sustainability and Energy Conservation Potential**

The relocation of the dispatch center to Building 210 would not affect sustainability or conservation measures. Therefore, this impact topic was dismissed from further analysis.

## **CHAPTER 2: ALTERNATIVES**

NEPA requires federal agencies to explore a range of reasonable alternatives aimed at addressing the purpose of and need for the proposed action. The alternatives under consideration must include a no-action alternative as prescribed by the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR Part 1502.14).

The alternatives analyzed in this document, in accordance with NEPA, are based on preliminary design and the result of internal scoping.

NPS explored and objectively evaluated two alternatives in this EA:

- Alternative 1: No Action
- Alternative 2: Replace Park Dispatch Center (Preferred Alternative)

### **ALTERNATIVE 1: NO ACTION**

Under alternative 1, the dispatch center would remain in its temporary location in Building 220. The dispatch center would remain fully functioning with no change to public safety or response times. Building 220 is outside of the park gate, which is not a secure location. Two dispatch stations would continue to use this location, and two park police dispatch stations would remain at the US Park Police dispatch center located at Floyd Bennett Field. Conditions inside Building 220 are cramped and separated from the management team located at park headquarters in Building 210. In case of emergency, an incident command station would likely be located in Building 120, which is separated from both dispatch centers and the management team.

### **ALTERNATIVE 2: REPLACE PARK DISPATCH CENTER (PREFERRED ALTERNATIVE)**

#### **Dispatch Center (Building)**

Under alternative 2, the temporary dispatch center at Building 220 would be permanently relocated to the south end of the first floor of the park headquarters building, Building 210. The dispatch center would require renovating approximately 5,000 square feet of interior space. Renovations would include removing and adding some non-load bearing walls and installing blast resistant glass supported by an independent rail system to the interiors of windows. In addition to the interior renovations, some small amount of tuck pointing to mortar joints on the exterior brick facing of Building 210 would occur as needed to eliminate moisture penetration.

In addition to the Gateway NRA dispatch center personnel, the space would also accommodate the relocation of US Park Police dispatch personnel from their current location at Floyd Bennett Field and provide space for the relocation of Statue of Liberty National Monument dispatch staff in the future if so desired. The location would also include space for an incident command center.

In addition to the interior renovations for the new dispatch center, approximately 2,600 square feet of vacant interior space at the north end of the first floor of Building 210 would also receive minor renovations. This space would accommodate the park rangers who currently occupy the area where the new dispatch center is proposed.

## Radio Tower and Ancillary Equipment

As part of the dispatch system, NPS would install a 100-foot-AGL radio tower monopole behind (on the west side) Building 210 with a chain link fence around it. The radio tower would be located close to the building, have a diameter of 36 inches at the base and 24 inches at the top, and would extend approximately 50 feet above the roofline of Building 210. Because the radio tower would be shorter than 200 feet AGL, it would not require lights. Seven antennas would be mounted on the radio tower at various heights and would accommodate the needs of both NPS and the US Park Police, including anticipated future needs (e.g., the potential relocation of Statue of Liberty National Monument dispatch functions to Building 210). The antennas would include:

- two Commscope VHP6-71 (6-foot diameter) or equivalent microwave antenna with outdoor microwave radio units attached at 60 and 80 feet AGL
- one Commscope VHP4-71 (4-foot diameter) or equivalent microwave antenna with outdoor microwave radio units attached at 80 feet AGL
- two 3-foot, side-arm, very high frequency base station antennas mounted at 40 and 90 feet AGL
- two global positioning system antennas, each with a diameter of 3.5 inches and a height of 4.0 inches (excluding mast adapter) mounted at 70 feet AGL

The concrete foundation for the radio tower monopole would be a 4-foot, 6-inch-diameter concrete base resting on a 16-foot-square by 1-foot, 6-inch-thick concrete foundation approximately 6 feet below grade. Bedrock is not expected to be encountered during the excavations for the foundation; therefore, no drilling would be required.

Additional infrastructure would include a 250-kilowatt natural gas powered backup generator located adjacent to Building 210. The generator would be located on a concrete pad with a masonry enclosure around it. The enclosure would be 24 feet by 18 feet with a height of 12 feet. There would also be one air condenser unit and two heat pumps that would be placed between the radio tower and Building 210 on a new concrete pad. The electrical connections between the new equipment and Building 210 would be underground and enter into the basement near the existing electrical room. No security lighting would be installed. A photosimulation showing the location of the radio tower and associated infrastructure is provided in figure 4. A photosimulation of the view of the radio tower from the front of Building 210 is provided in figure 5.

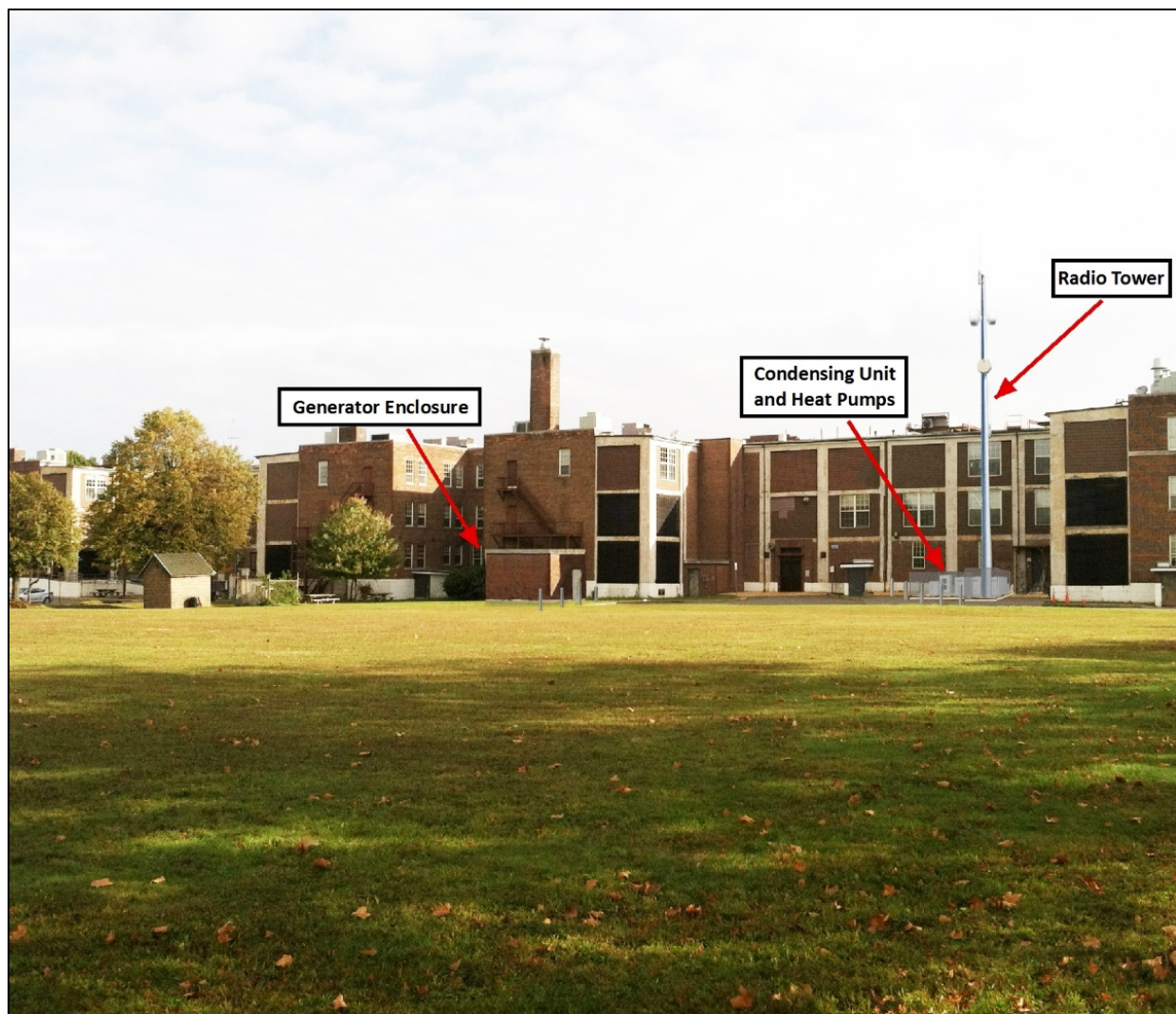
## MITIGATION MEASURES FOR THE PROPOSED ACTION

NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protection measures would be implemented as part of the proposed action.

### General Considerations

NPS would implement an appropriate level of monitoring and ensure that best management practices are employed throughout the construction process. This would help ensure that protection measures are being properly implemented and achieving their intended results of ensuring that no cultural resources are damaged and the public is protected.

Prior to construction, the park would conduct an archeological survey to ensure that significant archeological sites are not located in the areas to be disturbed by the project. In paved areas, monitoring would be completed during construction if deemed appropriate by the park archeologist.



**FIGURE 4. PHOTOSIMULATION OF PROPOSED RADIO TOWER AND GENERATOR ENCLOSURE**



FIGURE 5. PHOTOSIMULATION OF PROPOSED RADIO TOWER FROM THE FRONT OF BUILDING 210

## ALTERNATIVES CONSIDERED BUT DISMISSED

A number of design and construction options were identified during internal scoping and reviews of preliminary design plans for location of the dispatch center as well as the location of the radio tower monopole. During internal project development, these options were deemed not feasible or had several disadvantages and were not carried forward for analysis in this EA. They are described below.

### Replace Dispatch Center at another Location within the Park

Additional locations were considered for the location of the dispatch center. The following includes a list of all buildings under consideration and reasons for their dismissal from consideration.

- **Building 220** – Building 220 is the current temporary location for the dispatch center. The building is too small, is located outside the park gate, and is not secure enough to accommodate the program requirements for a long-term solution. It is also not large enough to be able to support the future consolidation of the dispatch functions of the US Park Police, and potentially the Statue of Liberty National Monument.
- **Building 120** – Building 120 (the park visitor center) is closer to Fort Tompkins and the radio tower monopole and generator enclosure would have been more visible within the Fort

Wadsworth Historic District, presenting a potential viewshed issue. Additionally, the topography of the area would impact the functionality of a dispatch system and require a taller radio tower.

- **Building 210 (north end)** – The north end of Building 210 presented unacceptable security issues. There is no safeguard between the street and the building so a vehicle could jump the curb and slam into the building.
- **Building 210 (third floor)** – The third floor of Building 210 presented unacceptable security issues. The windows of the third floor are at the same elevation as the Verrazano-Narrows Bridge, and therefore would be much more susceptible to terrorist attack and increased security threats.

### Use an Existing Structure in Place of a Radio Tower Monopole

NPS explored various options for using an existing tall structure instead of constructing a radio tower monopole.

- US Coast Guard communications tower – The US Coast Guard indicated that all space on its communications tower is currently being used or planned for future use; therefore, there was no room for NPS communication systems on the tower.
- Verrazano-Narrows Bridge – NPS considered placing equipment on the Verrazano-Narrows Bridge; however, due to legal, security, and access issues, it was not a viable option.
- Building 210 roof – NPS considered putting the antennas and microwave dishes on the roof of Building 210; however, that option was dismissed due to inadequate height for line-of-sight radio communications.

## SUMMARY OF ENVIRONMENTAL IMPACTS

Table 1 provides a summary of environmental consequences for each resource area analyzed in “Chapter 4: Environmental Consequences.” Alternatives are determined to have beneficial or adverse impacts for each area of analysis. Impacts are also assessed as to whether they are short term (duration of construction) or long term (greater than the duration of construction).

**TABLE 1. SUMMARY OF ENVIRONMENTAL CONSEQUENCES**

Resource Area	Alternative 1: No Action	Alternative 2: Replace Park Dispatch Center
<b>Historic structures and cultural landscapes</b>	There would be no new construction within the Fort Wadsworth Historic District or renovations in Building 210. Therefore, there would be no impacts.	<p><b>Dispatch Center (Building)</b></p> <ul style="list-style-type: none"> <li>• Renovations on the interior and tuck pointing of mortar on the exterior of the building would have no impact on the historic fabric, and no impact on the historic character of the building.</li> </ul> <p><b>Radio Tower and Ancillary Equipment</b></p> <ul style="list-style-type: none"> <li>• The installation of a backup generator, enclosure, and ancillary equipment would have minimal impacts on Building 210 because they would not diminish character-defining features of the building or prohibit the building from conveying its historic association as a contributing resource within the Fort Wadsworth Historic District.</li> </ul>

Resource Area	Alternative 1: No Action	Alternative 2: Replace Park Dispatch Center
		<ul style="list-style-type: none"> <li>Because of its location at the rear (west) elevation of the building, the generator, heat pumps, and condenser unit would not be visible from any important vantage points within the district or any other buildings that contribute to the Fort Wadsworth Historic District.</li> <li>Although the installation of the radio tower would introduce a new, visible structure within the historic district, it would not diminish the overall integrity of the historic district that makes it eligible for the National Register of Historic Places or Building 210 as a contributing resource. In addition it would not obstruct important views toward New York Harbor from the district. Therefore the tower would have a minimal impact on Building 210 and the Fort Wadsworth Historic District.</li> </ul>
<b>Visitor use and experience</b>	<p>There would be no new construction within the Fort Wadsworth Historic District or renovations in Building 210. Therefore, there would be no impacts.</p>	<p><b>Dispatch Center (Building)</b></p> <ul style="list-style-type: none"> <li>Visitors do not frequent Building 210 because it is the park headquarters; therefore, the interior renovations would not impact visitor use and experience.</li> </ul> <p><b>Radio Tower and Ancillary Equipment</b></p> <ul style="list-style-type: none"> <li>The installation of a backup generator, enclosure, and ancillary structures would have minimal to no adverse impacts on visitor use and experience because visitor use within Fort Wadsworth tends to be directed toward the eastern and southern portion of the property, in areas specifically designated for visitor use.</li> <li>Because of its location in the rear (west) of Building 210, the generator, heat pumps, and condenser unit would not be visible from any vantage points within Fort Wadsworth that are designated for visitor use.</li> <li>Although the installation of the radio tower monopole would introduce a new, visible structure, it would have minimal to no adverse impacts on visitor use and experience because the lower half would be concealed by Building 210 from most visitors entering the park along New York Avenue and from other areas that visitors use within Fort Wadsworth. Though the 100-foot-AGL radio tower monopole would be visible from recreation areas on Fort Wadsworth, it is not expected to alter the visitor experience.</li> </ul>

## THE ENVIRONMENTALLY PREFERABLE ALTERNATIVE

In accordance with the DO-12 Handbook, NPS identifies the environmentally preferable alternative in its NEPA documents for public review and comment [Sect. 4.5 E(9)]. The environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative (43 CFR 46.30).

After completing the environmental analysis, NPS identified alternative 1 as the environmentally preferable alternative. Alternative 1 would not provide for a new and more efficient dispatch center, but would best protect the existing cultural and natural resources in the study area because no new construction would occur. Based on the analysis of environmental consequences of each alternative, described in chapter 4, alternative 1 is the environmentally preferable alternative.

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## CHAPTER 3: AFFECTED ENVIRONMENT

This chapter of the EA describes existing environmental conditions in the areas potentially affected by the alternatives evaluated.

### HISTORIC STRUCTURES AND CULTURAL LANDSCAPES

#### Fort Wadsworth Historic District

Fort Wadsworth has been associated with the defense of New York Harbor since the 1700s (Lowenthal and Bathurst 1997). The site has served as the headquarters for the coastal defense system of New York Harbor. Individual sections of the fort have been listed on the National Register of Historic Places (National Register) over time, including the Fort Tompkins quadrangle (1974) and Battery Weed (1972).

In 1997, NPS prepared a National Register nomination for a Fort Wadsworth Historic District (Lowenthal and Bathurst 1997). The historic district comprises a much-enlarged area and an extended period of significance (1755–1945) that includes the Civil War batteries, Endicott period batteries, officer and enlisted housing, torpedo and mine storage facilities, and other ancillary support facilities. Its boundaries encompass the entire post (figure 6). The nomination was signed by the State Historic Preservation Officer Winthrop Aldrich and listed on the New York State Register of Historic Places. Although the nomination has not been formally listed, the historic district is eligible for listing in the National Register. The New York City Landmarks Preservation Commission has also designated Fort Tompkins and Battery Weed as City Landmarks, but no other section of Fort Wadsworth is so designated.

As described in the National Register Nomination for Fort Wadsworth:

Fort Wadsworth is significant under Criteria A, C, and D within the national context of coastal defense, and specifically for its central position within the defenses of New York Harbor, the most important port in the country. It was a component of the harbor defenses from the late 18th Century to the end of World War II, with its relative importance changing in relation to strategic considerations and advances in weaponry. Beginning with the 1746 signaling system developed by New York State militia, it represents much of the evolution in the philosophy and technology of American coastal defense from 1794 to 1945. Numerous resources remain to provide evidence of its long and prominent history (Lowenthal and Bathurst 1997).

Throughout its life as an active military installation, the garrison at Fort Wadsworth expanded and contracted in relation to perceived threats. After reaching a strength of 1,500 men during World War I, the garrison at Fort Wadsworth was reduced, and command of the post was shifted from the Coast Artillery Corps to the Infantry. Only a small detachment of Coast Artillery personnel was left to maintain the guns, some of which had already been dismantled (Lowenthal and Bathurst 1997).

Prior to 1926, infantry lived in the casemates of Fort Tompkins, which had been declared unfit as housing in 1903. To meet the increased housing demands of the enlarged garrison during World War I, temporary wood frame barracks were built on base (Lowenthal and Bathurst 1997).

After World War I, the post commander argued that Fort Wadsworth was obsolete for coastal defense and should be converted entirely to an infantry base, while the Chief of Coast Artillery contended that Fort Wadsworth and Fort Hamilton located across the harbor still had defensive value.



FIGURE 6. FORT WADSWORTH HISTORIC DISTRICT

At the same time, a housing program approved by Congress on May 4, 1926, appropriated \$285,000 for barracks at the fort and a systematic plan for permanent housing and support of troops at the fort had been developed (Lowenthal and Bathurst 1997).

In 1927, the Secretary of War ordered that Fort Wadsworth and Fort Hamilton should be maintained as a coastal defense installation. The result of this decision was that the infantry strength was increased, but the coastal defense function was emphasized. The infantry presence was greatly expanded, but the coastal defense function was held up as the post's most important function. However during the inter-war years, the coastal guns were mothballed. Nevertheless, any planned construction was not allowed to interfere with the artillery's line of fire (Lowenthal and Bathurst 1997). The initial building funded by the 1926 authorization was Building 210, a barracks for an infantry battalion, which was completed in 1929.

After use during World War II, the Korean War, and as a Nike missile air defense command post during the Cold War, the construction of the Verrazano-Narrows Bridge through the post dramatically reduced its military value and the post was declared surplus in 1972. A groundswell of support for the preservation of the buildings on the post led to individually placing Battery Weed and Fort Tompkins on the National Register (Lowenthal and Bathurst 1997).

In 1972, Fort Wadsworth was also identified as one of the areas to be managed by NPS as part of the proposed Gateway NRA, once military use ended. In 1983, however, the Navy announced plans to use the site for a new homeport. The change in function included the demolition of several buildings in 1990 as well as the construction of new housing, which altered the appearance and character of Fort Wadsworth. In 1994, the Base Closure and Realignment Commission recommended the closure of the homeport. On October 1, 1995, NPS assumed control of the base (Lowenthal and Bathurst 1997).

### ***Fort Wadsworth Cultural Landscape***

The 1997 National Register Nomination for the Fort Wadsworth identifies contributing features that are a part of the Fort Wadsworth cultural landscape. Identified character-defining features that contribute to the cultural landscape at Fort Wadsworth include:

- The boundary as it existed from 1901 to the present
- The circulation system
- The open, park-like feeling throughout the installation including older trees, both native and planted
- The varied, often dramatic topography
- The impressive views of New York Harbor
- The special alignment of the fortification to the terrain

Building 210 faces east on New York Avenue, a character-defining feature of the cultural landscape. New York Avenue has served as the main street of Fort Wadsworth since the mid-19th century. Historically the streetscape was defined by fairly dense one- to three-story buildings, including a hospital, barracks, and single-family residences. The hospital was later demolished and replaced with a modern building, partly used as the NPS Staten Island Visitors Center (Building 120) (Lowenthal and Bathurst 1997). While the streetscape along New York Avenue has changed with the addition of several non-historic buildings, New York Avenue continues to define the character of the district as the primary road and axis of Fort Wadsworth. Building 210 enforces its historic character with its orientation and prominence along the street.

Also within the Fort Wadsworth Historic District is the Battery Weed Cultural Landscape, a distinct landscape that encompasses the battery and its immediate vicinity that forms a headland extending into

the Narrows of New York Harbor. The boundaries extend from the overlook and stone wall along the top of the slope bordering Fort Tompkins, east to the seawall along the shore, and north and south encompassing portions of Batteries Bacon and Catlin. The cultural landscape includes several ancillary buildings and structures, most of which are related to a mine (torpedo) defense system that was deployed in the Narrows (Gleisner and Auwaerter 2008).

### ***Building 210***

The 1997 National Register Nomination for the Fort Wadsworth Historic District lists Building 210 as a contributing resource. The building was constructed in 1929 as an infantry battalion barracks to accommodate the increased infantry presence at the post. The three-story building has four major entrances and simple Art Deco detailing along the façade (facing east). It is a long, narrow building, approximately 400 feet long and 40 feet deep. Two pairs of pavilions project from the rear (west elevation), one pair at each end. Porches on the rear between the two pairs of ells were enclosed around 1941 to increase capacity. According to the nomination (Lowenthal and Bathurst 1997), sometime after 1960 and outside the period of significance of the district (1755–1945), the barracks was converted to office use, extensively altering the interiors and replacing the windows. It also appears that the entire rear elevation was covered with an addition, possibly during the conversion of the post to part of the Navy's homeport in the 1990s. In terms of its location within the historic district, Building 210 is bounded on all sides either by buildings that do not contribute to the historic district or by the Verrazano-Narrows Bridge overpass (figure 6). The building is currently used as the park headquarters.

## **VISITOR USE AND EXPERIENCE**

NPS *Management Policies 2006* (NPS 2006) state that enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks and that NPS is committed to providing appropriate, high-quality opportunities for visitors to enjoy. Fort Wadsworth, located within the Staten Island, New York City unit, is open year-round to visitors from sunrise to sunset. Nearly 135,000 individuals visited the park from February 2014 to February 2015 (NPS 2015a).

Fort Wadsworth not only offers a rich historic experience with impressive views of New York Harbor, it also offers a variety of visitor activities. The Visitor Use and Experience impact topic encompasses areas within Fort Wadsworth that are designated for visitor use, shown in figure 7 and further discussed below. Specific visitor use areas include the Visitor Center and a walking/biking tour in the northeast section of the park overlooking the New York Harbor to the east. A designated camping area is available within the southern portion of the park. Fishing is available along the southern shoreline, off the Lower New York Bay. Visitor use and experience also encompass what can be seen from these areas as well as what can be seen as visitors travel to these designated areas of the park. Visitors enter and exit the park through the northern gate on New York Avenue, which is the primary road for access to all visitor activities.

In the northeast section of the park, east of Building 210 and the project area, is a 1.5-mile-long walking/biking tour with nine points of interest. The tour starts at the visitor center and follows New York Avenue to the south where visitors can view the Training Mortar. The tour then continues east along Tompkins Avenue past two points of interest—Fort Tompkins and Battery Duane. Before turning south, visitors can stop at a scenic vista looking east toward Battery Weed and New York Harbor. Also located at this overlook is another point of interest, the Six Pounder. The tour continues south under the Verrazano-Narrows Bridge before abruptly turning north along Weed Road. Along this portion of the tour, visitors can view the South Cliff Battery to the east before continuing north and crossing under the bridge again. The tour then leads to two points of interest—Battery Weed to the east and Torpedo Shed/Wharf, just west of the tour route. As the tour continues north along Weed Road, visitors can observe the North Cliff Battery off to the east. Turning to the west, the tour follows Mont Sec Avenue where visitors can enjoy the last interest point, Mont Sec House. From here, the tour follows Mont Sec Avenue until it intersects with New York Avenue and visitors can return to the visitor center/parking lot



FIGURE 7. VISITOR USE AT FORT WADSWORTH

area. Visitors can stop and enjoy bird watching along bluffs and fields throughout the walking/biking tour as well as goat watching. Goats were originally integrated into the landscape of Fort Wadsworth to control invasive plants, but have since become a highlight for visitors on the tour.

Shore fishing, available along the southern edge of Fort Wadsworth bordering the Lower New York Bay, is south of Building 210 and the project area. Individuals can enjoy fishing from sunrise to sunset, or night fishing with the purchase of an annual pass. Visitors can also partake in ranger-led programs during the warmer seasons. These programs range from informative historic talks to hands-on activities such as beach cleanups.

Along with the multitude of daily activities, Fort Wadsworth offers urban camping. The camping ground is located south of Building 210 and the project area. Public camping is available at a cost for individuals who want a unique urban experience. Camp sites are primitive and accommodate up to six people per site. They have room for one large tent or two small tents and include amenities such as a picnic table, grill, and a fire ring (NPS 2015b). All other areas of Fort Wadsworth, including Buildings 210 and 220, are off limits to visitors.

## CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

### GENERAL METHODOLOGY FOR ESTABLISHING IMPACTS

In accordance with CEQ regulations, direct, indirect, and cumulative impacts are described (40 CFR 1502.16) and the impacts are assessed in terms of context and intensity (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are also described and incorporated into the evaluation of impacts.

#### Geographic Area Evaluated for Impacts (Area of Analysis)

The geographic study area (or area of analysis) for this assessment is Fort Wadsworth and the Fort Wadsworth Historic District. The specific area of analysis for each impact topic is defined at the beginning of each topic discussion.

#### Type of Impact

The potential impacts of both alternatives are described in terms of type, as follows:

**Direct:** Impacts that would occur as a result of the proposed action at the same time and place of implementation (40 CFR 1508.8).

**Indirect:** Impacts that would occur as a result of the proposed action but later in time or farther in distance from the action (40 CFR 1508.8).

**Beneficial:** A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.

**Adverse:** A change that declines, degrades, and/or moves the resource away from a desired condition or detracts from its appearance or condition.

#### Cumulative Impacts Analysis Method

Cumulative impacts are defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.7). Cumulative impacts were determined for each impact topic by combining the impacts of the alternative being analyzed and other past, present, and reasonably foreseeable actions that would also result in beneficial or adverse impacts. Because some of these actions are in the early planning stages, the evaluation of the cumulative impact is based on a general description of the projects. These actions were identified through the internal project scoping process and are summarized below. Figure 9 (in the “Visitor Use and Experience” section below) shows the locations of the projects.

**Bank Stabilization Project – Fort Wadsworth Slope:** Storm surge from Hurricane Sandy hit New York City on October 29, 2012. Along the eastern shoreline of Fort Wadsworth, the storm surge reach an elevation of approximately 9.3 feet above mean high water and caused the bluffs along the coastline to recede by as much as 20 feet in some places. The granular material contributed to the beaches by bank retreat resulted in an increase of 5 feet of elevation on the beach and advanced the mean low water mark channelward by almost 20 feet. Essentially, the storm built a beach profile that is higher and wider than the pre-Sandy beach face. The purpose of this project is to repair damage to the Fort Wadsworth landscape along the 1,500 feet of eastern shoreline impacted by Hurricane Sandy. Potential actions could involve some or all of the following:

- Remove large and/or damaged/leaning trees and perhaps some or all the exotic vegetation from the bank.
- Conduct minor bank grading/fill placement from the bottom of the slope to remove extreme slopes and introduce topsoil into the bank sediments.
- Eradicate exotic species that will reestablish after clearing and grading is complete.
- Revegetate with a variety of native shrubs and grasses.
- Add native cobble and gravel material to select areas of the existing beach to achieve sufficient height and breadth to provide protection during storm events.
- Add a stone revetment to the toe of the embankment and back fill the revetment area with cobble gravel material to mask the presence of the engineered structure.

**Expanded Camping Plan:** Within Fort Wadsworth an area south of the Verrazano-Narrows Bridge is designated as a Recreation Zone and a portion of the area contains camping facilities. As part of Gateway NRA's recently completed general management plan (NPS 2014), camping facilities would be expanded and include a variety of different types of camping closer to the coastline and for various skill levels.

**US Army Reserve Parking Lot with Solar Panels:** In 2014, the US Army Reserve constructed a new parking lot approximately 550 feet west of Building 210. The paved parking lot includes 10 light stanchions with small solar panels mounted on top of them (figure 8).



**FIGURE 8. U.S. ARMY RESERVE PARKING LOT WITH SOLAR POWERED LIGHT STANCHIONS**

## ASSESSING IMPACTS USING COUNCIL ON ENVIRONMENTAL QUALITY CRITERIA

The impacts of the alternatives are assessed using the CEQ definition of “significantly” (1508.27), which requires consideration of both context and intensity:

(a) **Context** – This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

(b) **Intensity** – This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:

- (1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect would be beneficial.
- (2) The degree to which the proposed action affects public health or safety.
- (3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.
- (4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.
- (5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.
- (6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
- (7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.
- (8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register or may cause loss or destruction of significant scientific, cultural, or historical resources.
- (9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
- (10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

For each impact topic analyzed, an assessment of the potential significance of the impacts according to context and intensity is provided in the “Conclusion” section that follows the discussion of the impacts under each alternative.

## HISTORIC STRUCTURES AND CULTURAL LANDSCAPES

### Methodology and Assumptions

The analyses of effects on cultural resources that are presented in this section respond to the requirements of NEPA. A separate assessment of effect under section 106 is being conducted separately, but concurrently with the NEPA effort.

NPS guidance for evaluating impacts (DO-12) requires that impact assessment be scientific, accurate, and quantified to the extent possible (NPS 2001). For cultural resources, it is seldom possible to measure impacts in quantifiable terms; therefore, impacts must rely heavily on the professional judgment of resource experts.

The purpose of this impact analysis is to assess the effects of the alternatives on historic structures at Fort Wadsworth in the Staten Island, New York unit of Gateway NRA. To determine impacts, current resources at the park and the potential effects of replacing the temporary dispatch center with a new, permanent dispatch center and the installation of a 100-foot-AGL radio tower monopole, heat pumps, a condenser unit, and a backup generator enclosure behind Building 210 were considered. This EA evaluates impacts on cultural resources according to *NPS Management Policies 2006*.

The proposed alternatives have the potential to impact the character-defining features of Building 210 as a contributing resource within the National Register-eligible Fort Wadsworth Historic District and to the historic district itself. The following analysis, therefore, provides a two-tiered approach to evaluating the impacts of the alternatives.

The significance of the proposed action on cultural resources will be analyzed within the context of the ability of the resource to convey its association with significant historic events and themes, such as military history and American coastal defense. Adverse impacts would result if the proposed action alters a character-defining feature that qualifies the resource for inclusion in the National Register in a manner that would diminish its integrity of location, design, setting, materials, workmanship, feeling or association.

### Study Area

The study area selected was the limits of the Fort Wadsworth Historic District as delineated in 1997 that contains contributing buildings, structures, and sites, including the cultural landscape. There are no other historic resources in the immediate vicinity of the historic district. The height of the radio tower monopole was taken into consideration when determining the study area.

### Impacts of Alternative 1: No Action

#### *Analysis*

Under alternative 1, the temporary dispatch center would not be permanently relocated to Building 210 and a 100-foot-AGL radio tower monopole and backup generator enclosure would not be installed. Building 210 would continue to be used as the park headquarters and the dispatch center would remain at Building 220. There would be no impacts on historic resources.

#### *Cumulative Impacts*

Because there would be no impacts to historic resources, there would be no cumulative impacts.

## Conclusion

Under alternative 1 the dispatch center would not be relocated and there would be no development within the study area. Buildings 210 and 220 would continue their current use. Therefore, historic resources would not be affected, and consequently there would be no cumulative impacts.

## Impacts of Alternative 2: Replace Park Dispatch Center

### Analysis

**Dispatch Center (Building).** Under alternative 2, Building 210 would be renovated for use as the dispatch center. The only exterior renovations to the building would include tuck pointing of the brick mortar joints, as needed, to eliminate moisture penetration. This process would follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and would not impact the exterior appearance or character of the building.

The proposed interior renovations to Building 210—the installation of blast resistant wall material on the west wall interior, the installation of blast resistant glass on the interiors of the windows, and the reconfiguration of the interior plan to accommodate a dispatch center at the south end of the building and the park rangers at north end of the building would have no impact on historic fabric. As noted previously, the interior of the building has been extensively altered at least twice outside the period of significance of the historic district, eliminating any sense of the original interior plan. The window system would be supported by an independent rail system. Consequently the undertakings on the interior of the building would have no impact on any historic fabric, and no impact on the historic character of the building.

**Radio Tower and Ancillary Equipment.** Alternative 2 would require the installation of a backup generator and enclosure, heat pumps, and condenser unit between the two southern pavilions on the rear (west) elevation of Building 210. This elevation of the building has been heavily altered with a modern addition and is not a primary façade. Therefore the installation of a backup generator, enclosure, and ancillary equipment would have minimal impacts on Building 210 because it would not diminish character-defining features of the building or prohibit the building from conveying its historic association as a contributing resource within the Fort Wadsworth Historic District.

Because of its location the rear (west) elevation of the building, the generator, heat pumps, and condenser units would not be visible from any important vantage points within the district or any other buildings that contribute to the Fort Wadsworth Historic District. Therefore it would have no direct or indirect impacts on the historic character of the district. In addition, it would not alter character-defining features of the Fort Wadsworth cultural landscape because it would not alter the open park-like space of the district nor would it obstruct views toward the harbor. It is unlikely that any noise produced by the generator during its infrequent operation would affect the character of the district, particularly in light of the building's proximity to the approaches to the Verrazano-Narrows Bridge.

The project calls for the construction of a 100-foot-AGL radio tower monopole adjacent to the rear (west) side of Building 210. The radio tower would rise approximately 50 feet above Building 210 and approximately 25 feet above an existing chimney at the rear of the building. Because the radio tower monopole would be freestanding and would be adjacent to the modern addition to Building 210, it would not impact the recognition of the building as a contributing element in the historic district. Based on the viewshed analysis prepared for the project, the tower would, however, be visible from listed or contributing structures to the historic district, including Fort Tompkins (see figure 9 in "Visitor Use and Experience" below). However, the approaches to the Verrazano-Narrows Bridge would be visible in the background from the same direction, which would diffuse any visual impacts that the radio tower may have on the historic district. The construction of the monopole would not directly or indirectly impact character-defining features of the cultural landscape because it would not alter the open park-like space of

the district nor would it impede views toward New York Harbor from contributing resources in the district. Although the installation of the radio tower would introduce a new, visible structure within the historic district, it would not diminish the overall integrity of the historic district that makes it eligible for the National Register or Building 210 as a contributing resource. Therefore the radio tower would have a minimal impact on Building 210 and the Fort Wadsworth Historic District.

### ***Cumulative Impacts***

Each of the planned projects for Fort Wadsworth is sufficiently separated and of a disparate nature from each other that there would be an imperceptible impact from the combination of the projects.

The Bank Stabilization Project – Fort Wadsworth Slope, Expanded Camping Plan, and US Army Reserve parking lot project contribute to the cumulative impacts on historic resources at Fort Wadsworth. The Bank Stabilization Project is located at some distance from Building 210 and would likely result in a beneficial impact on the historic district. The Expanded Camping Plan would be located well east of Building 210, and would be separated visually from Building 210 by the Verrazano-Narrows Bridge. The plan would likely have no impact on the historic district.

Although the historic district extends to the western edge of the property, the buildings near the US Army Reserve parking lot light stanchions are all non-contributing structures. The addition of the radio tower and backup generator and other ancillary equipment to the visual landscape would have no impact on historic resources on the western and southern side of the park because there are no contributing resources west or south of Building 210. It is also likely that due to the locations of Buildings 208 and 209 (both non-contributing buildings located to the west of Building 210) flanking the US Army Reserve project, the two projects would not be seen in tandem from sections of the park that are considered contributing structures (see figure 6).

### ***Conclusion***

The project would have minimal impacts on the historic resources of the Fort Wadsworth Historic District, including Building 210, because of the location of the backup generator and its enclosure, heat pumps, and condenser unit on the rear of the building and adjacent to an area of non-contributing buildings, the relatively low height of the radio tower, and the interior renovations occurring in an area of the building without historic integrity, and because the project would not obstruct significant views from the district towards New York Harbor. The proposed action would not alter character-defining features of Building 210 or the Fort Wadsworth Historic District in a manner that would diminish their integrity of location, design, setting, materials, workmanship, feeling or association. Therefore, alternative 2 would have minimal impacts on historic structures and cultural landscapes and would contribute imperceptible impacts on overall cumulative impacts. Therefore, there would be no significant impacts on historic structures and cultural landscapes.

## **VISITOR USE AND EXPERIENCE**

### **Methodology and Assumptions**

The purpose of this impact analysis is to assess the effects of the alternatives on visitor use and experience at Fort Wadsworth in the Staten Island, New York unit of Gateway NRA. To determine impacts, the current uses at the park and the potential effects of replacing the temporary dispatch center with a new, permanent dispatch center and the installation of a 100-foot-AGL radio tower monopole, a generator enclosure, two heat pumps and one condenser unit behind Building 210 were considered. The types of visitor use and experience that occur at Fort Wadsworth that might be affected by the proposed action were considered.

The significance of the proposed action on visitor use and experience was analyzed based on how it would affect the current view from visitor-designated areas and thus the experience of the visitor. To determine where the radio tower monopole would be visible, a viewshed analysis was performed from the perspective of the radio tower instead of from the perspective of explicit visitor use points within Fort Wadsworth. Using an advanced algorithm that accounted for the location and height of the radio tower, the topography of the surrounding area, and the general location of visitor use areas, a model created in ArcGIS was used to calculate the viewshed with the radio tower as the observer. Anywhere the radio tower can “see” is presumably “seen” back by a visitor. Buildings, tree cover, and other infrastructure were not considered in the model.

Adverse impacts would result if the proposed action alters these views. It should be noted, however, that viewshed impacts are not easy to quantify, because these impacts often fall within the eye of the beholder. A viewshed impact to one person may be of minor consequence to another.

## Study Area

For the purpose of the visitor use and experience impact analysis, the study area was considered to be Fort Wadsworth, specifically areas designated as visitor use and the associated views from each area.

## Impacts of Alternative 1: No Action

### *Analysis*

Under alternative 1, the temporary dispatch center would not be permanently relocated to Building 210 and a 100-foot AGL radio tower monopole, a generator enclosure, two heat pumps, and one condenser unit would not be installed. Building 210 would continue to be used as the park headquarters with park rangers continuing to occupy the south end of the building. The dispatch center would continue to operate out of Building 220. Because there would be no new construction under this alternative there would be no impacts on visitor use and experience.

### *Cumulative Impacts*

Because there would be no impacts on visitor use and experience, there would be no cumulative impacts.

### *Conclusion*

Under alternative 1, the dispatch center would not be relocated to Building 210 and there would be no development within the study area. Buildings 210 and 220 would continue their current use. Therefore, visitor use and experience would not be affected under alternative 1, and as such there would be no cumulative impacts.

## Impacts of Alternative 2: Replace Park Dispatch Center

### *Analysis*

**Dispatch Center (Building).** Under alternative 2, the temporary dispatch center would be permanently located on the first floor of Building 210, which is the park headquarters. The spaces being renovated as part of the project, including the space on the north side of the building for park rangers, are not frequented by visitors, so the relocation of the dispatch center to Building 210 would not impact visitors. Because the proposed renovations are interior, there would be no impact on the viewshed.

**Radio Tower and Ancillary Equipment.** Along with the relocation of the dispatch center, a 100-foot-AGL radio tower monopole, a backup generator enclosure, two heat pumps, and one condenser unit would be installed immediately adjacent to the west side of Building 210. Visitor use would not be

affected by alternative 2. Impacts associated with alternative 2 on visitor experience are expected to be minimal to none because the visual focus of Fort Wadsworth already tends to be directed to the east, looking out to the New York Harbor, and to the south along the Lower New York Bay.

A viewshed analysis was completed for Fort Wadsworth that considered the study area boundary, radio tower monopole location and height, and topography of the area, using the methodology described above. Figure 9 shows locations within the Fort Wadsworth area where the radio tower would potentially be visible, including four of the nine points of interest included along the walking/biking tour. The radio tower would, however, be located west of Building 210, so much of its lower half would be concealed from view. The radio tower would also potentially be visible from portions of the camping area in the southern portion of Fort Wadsworth and the fishing area along the beach bordering the Lower New York Bay; however, it is anticipated that fishermen would be facing the water and would not be adversely impacted by the change in viewshed. Visitors entering the park along New York Avenue for all recreational purposes would be able to see the radio tower, but again, Building 210 would conceal the lower portion of the radio tower from view. Additionally, the approaches to the Verrazano-Narrows Bridge would be visible in the background, which would diffuse any visual impacts that the top portion of the radio tower may have.

### ***Cumulative Impacts***

The Bank Stabilization Project – Fort Wadsworth Slope and Expanded Camping Plan contribute to the cumulative impacts on visitor use and experience at Fort Wadsworth. The Bank Stabilization Project – Fort Wadsworth Slope would visually and structurally improve the eastern shoreline of Fort Wadsworth, enhancing the view from the walking/biking tour for visitors. The Expanded Camping Plan would provide better and more camping opportunities for visitors. Neither of these projects would adversely impact the existing viewshed for visitors. The installation of solar panels in the US Army Reserve parking lot introduced a new visual element to the area along the suggested bike path route, resulting in a slight adverse impact to visitor experience. Alternative 2 would contribute to the cumulative impacts by adding a new, permanent dispatch center, including the installation of a 100-foot-AGL radio tower monopole, a generator enclosure, two heat pumps, and one condenser unit behind Building 210 on Fort Wadsworth. There would be an adverse impact because the radio tower monopole would potentially be visible to visitors, but the impact would be so small that it would not negate the beneficial impacts of other projects.

### ***Conclusion***

Overall, alternative 2 would have minimal adverse impacts on visitor use and experience. Although the radio tower monopole would potentially be viewable from recreation areas on Fort Wadsworth, it is not expected to alter the visitor experience because the visual focus of Fort Wadsworth tends to be directed toward the eastern and southern portions, overlooking the New York Harbor and Lower New York Bay, respectively. It is expected to have little to no impact on visitor use and would contribute imperceptible impacts on overall cumulative impacts. Therefore, there would be no significant impacts on visitor use and experience.



FIGURE 9. FORT WADSWORTH VIEWSHED ANALYSIS

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## **CHAPTER 5: CONSULTATION AND COORDINATION**

This “Consultation and Coordination” chapter describes the public involvement and agency consultation used during the preparation of the EA. A combination of activities, including internal scoping, has helped to guide NPS in developing this EA. This chapter provides a detailed list of the various consultations initiated during the development of the EA, as well as a list of recipients for this document.

### **PLANNING AND PUBLIC INVOLVEMENT**

#### **Internal Scoping**

The internal scoping process for the proposed project began on May 28–29, 2014, when representatives from Gateway NRA conducted a value analysis study to discuss potential alternatives for replacing the dispatch center and then using a choosing by advantages decision-making system to determine a preferred alternative. The internal scoping process continued on February 18, 2015, when representatives from Gateway NRA, NPS Denver Service Center, and their consultants met to discuss the purpose of and need for the project, potential alternatives that could meet these needs, and resource conditions and issues within the project area. The group also initiated plans for future agency and public involvement activities. Throughout the development of this EA, the group coordinated regularly to review relevant issues, discuss the development of alternatives and impact analysis, and further develop means of including agencies and the public in the planning process.

#### **Public Involvement**

The EA will be on formal public and agency review for 30 days. Interested individuals, agencies, and organizations will be notified of its availability. The EA will be available for public review on the NPS Planning, Environment, and Public Comment website <http://parkplanning.nps.gov/replacedispatch>, and hard copies will be available at the park headquarters.

### **AGENCY CONSULTATION**

NPS will initiate consultation with relevant agencies during the EA public review period. This consultation is discussed in more detail below. Copies of correspondence between NPS and the agencies, and responses from the agencies, if applicable, will be provided in the decision document.

#### **Section 7 of the Endangered Species Act**

Section 7 of the Endangered Species Act requires federal agencies to consult with USFWS regarding the potential for proposed actions to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. NPS has determined that there would be no effect on any listed species because no threatened or endangered species are located in the project area. NPS is sending a letter to USFWS notifying it of the availability of the EA during the public and agency 30-day review period.

#### **Section 106 of the National Historic Preservation Act**

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the impacts of their undertakings on historic properties. This EA evaluates impacts on cultural resources according to NPS *Management Policies 2006*. Compliance with section 106 of the NHPA is being carried out separately but concurrently with the NEPA process. A consultation letter for section 106 will be sent to

the New York State Office of Parks, Recreation and Historic Preservation during the public review period for the EA.

NPS has made a finding (of “no adverse effect”) for this undertaking. In compliance with section 106, NPS has provided the New York State Office of Parks, Recreation and Historic Preservation with an Assessment of Effect on historic properties and a request for concurrence with the NPS determination.

### **Coastal Zone Management Act**

A federal consistency determination is required for this project under the Coastal Zone Management Act, as amended. The coastal zone management program federal consistency review process is described in federal regulation 15 CFR 930: Federal Consistency with Approved Coastal Management Programs. The coastal zone management program leaves day-to-day management decisions at the state level in New York. The New York State Department of State, Division of Coastal Resources will review this project for federal consistency. The Federal Consistency Determination prepared for New York State Department of State, Division of Coastal Resources is attached to this EA as appendix A.

## **LIST OF PREPARERS**

### **US Department of the Interior, National Park Service**

#### **Hurricane Sandy Recovery Team**

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## CHAPTER 6: ACRONYMS

Above Ground Level	(AGL)
CMP	(Coastal Management Program)
Council on Environmental Quality	(CEQ)
Code of Federal Regulations	(CFR)
Director's Order 12	(DO-12)
Environmental Assessment	(EA)
National Environmental Policy Act	(NEPA)
National Historic Preservation Act	(NHPA)
National Park Service	(NPS)
National Recreation Area	(NRA)
National Register of Historic Places	(National Register)
Traditional Cultural Property	(TCP)
US Fish and Wildlife Service	(USFWS)

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## CHAPTER 7: REFERENCES

Gleisner, Jean B. and John Auwaerter

- 2008 Cultural Landscape Report for the Battery Weed Headland. Fort Wadsworth Gateway National Recreation Area Staten Island, New York. Prepared by the Olmsted Center for Landscape Preservation, National Park Service, Boston, Massachusetts.

JMA

- 2011 Archeological Overview and Assessment of the Gateway National Recreation Area. Report prepared for the National Park Service, Northeast Region Archeology Program.

Lowenthal, Larry, and Peter Bathurst

- 1997 Fort Wadsworth. National Register Nomination prepared by the National Park Service. Copy on file at the New York State Office of Parks, Recreation and Historic Preservation.

National Park Service

- 1972 Enabling Legislation for Gateway National Recreation Area. *Title 16, Chapter 1, Subchapter LXXXVII, 460cc of the United States Code*, ratified on October 27.
- 1995 Site Management Plan Environmental Assessment Fort Wadsworth Gateway National Recreation Area/New York—New Jersey. November 1995.
- 1998 Director's Order 28: *Cultural Resource Management*. Available at: <http://home.nps.gov/applications/npspolicy/DOrders.cfm>.
- 2001 Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making*.
- 2006 Management Policies 2006. Available at <http://www.nps.gov/policy/mp2006.pdf>.
- 2014 A New Vision for a Great Urban National Park. Gateway National Recreation Area Final General Management Plan Environmental Plan Environmental Impact Statement. April 2014.
- 2015a NPS Stats: National Park Service Visitor Use Statistics. Gateway NRA Report Date: Feb 2015. Available at <https://irma.nps.gov/Stats/SSRSReports/Park%20Specific%20Reports/Park%20YTD%20Version%201?Park=GATE>. Accessed April 15, 2015.
- 2015b Gateway National Recreation Area. U.S. Department of the Interior, 02 Apr. 2015. Available at <http://www.nps.gov/gate/index.htm>. Accessed April 15, 2015.

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## **APPENDIX A: FEDERAL CONSISTENCY DETERMINATION**

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# FEDERAL CONSISTENCY DETERMINATION

## PROJECT DESCRIPTION

The National Park Service (NPS) proposes to relocate the dispatch center from the Sandy Hook Unit of Gateway National Recreation Area (NRA) to a more resilient location within the park. Hurricane Sandy destroyed the Gateway NRA's dispatch center in the park's Sandy Hook unit, New Jersey. The proposed relocation site is located above the floodplain at Fort Wadsworth in the park's Staten Island unit in New York. Work includes relocating the center to an existing building (the park headquarters, Building 210) and installing a 100-foot-above ground level (AGL) radio tower monopole with seven antennas. The environmental assessment (EA) analyzes the no-action alternative and the proposed dispatch center relocation alternative and their impacts on the environment. NPS also considered several other alternatives that were not carried forward for analysis. Compliance with section 106 of the National Historic Preservation Act (NHPA) of 1966 is occurring separately, but concurrently with the National Environmental Policy Act (NEPA) process and the execution of a decision document for the identified action will be dependent on completion of the section 106 process.

The purpose of the project is to replace the temporary dispatch center at Gateway NRA with a new, permanent dispatch center at a resilient location. The project would provide sufficient space for an Incident Command Center and future consolidation of the Gateway Dispatch Center with the dispatch functions of the US Park Police and, potentially, the Statue of Liberty National Monument.

Hurricane Sandy destroyed the Gateway Dispatch Center located at Sandy Hook. A temporary dispatch center was relocated to higher ground in Building 220 at Fort Wadsworth, but is inadequate for long-term use. A secured location with updated systems is needed. The US Park Police also need a resilient dispatch center because their current location at Floyd Bennett Field, while unharmed by Hurricane Sandy, may be vulnerable to future storms. The new dispatch center would consolidate park dispatch functions with the US Park Police and create more efficient operations during emergency events. It also would allow for the potential future consolidation with dispatch services from the Statue of Liberty National Monument, because the Ellis Island communication center lacks full dispatch capabilities.

The dispatch center would be relocated to the existing Building 210 at Fort Wadsworth. The dispatch center would require renovation of interior spaces within the building. The dispatch center would require renovating approximately 5,000 square feet of interior space. Renovations would include removing and adding some non-load bearing walls and installing blast resistant glass supported by an independent rail system to the interiors of windows. In addition to the interior renovations, some small amount of tuck pointing to mortar joints on the exterior brick facing of Building 210 would occur as needed to eliminate moisture penetration. As part of the dispatch system, NPS would install a 100-foot-AGL radio tower monopole behind (to the west of) Building 210. The monopole would be located close to the building, have a diameter of 36 inches at the base and 24 inches at the top, and would extend approximately 50 feet above the roofline of Building 210. The proposed radio tower would have seven antennas mounted on it at various heights. The concrete foundation for the radio tower monopole would be a 4-foot, 6-inch-diameter concrete base resting on a 16-foot-square by 1-foot, 6-inch-thick concrete foundation approximately 6-feet below grade. Bedrock is not expected to be encountered during the excavations for the foundation; therefore, no drilling would be required.

Additional infrastructure would include a 250-kilowatt natural gas powered backup generator located adjacent to Building 210. The generator would be located on a concrete pad with a masonry enclosure around it. The enclosure would be 24 feet by 18 feet with a height of 12 feet. Furthermore, one air condenser unit and two heat pumps would be placed between the radio tower and Building 210 on a new concrete pad. The electrical connections between the new equipment and Building 210 would be

underground and enter into the basement near the existing electrical room. No security lighting would be installed. Figure A-1 shows the project area, while figures A-2 and A-3 provide photo simulations of the infrastructure.

The EA has been prepared in accordance with NEPA, as amended, and implementing regulations, 40 Code of Federal Regulations Parts 1500–1508, NPS Director’s Order 12 (DO-12) and the handbook, *Conservation Planning, Environmental Impact Analysis, and Decision-making*. An EA analyzes the proposed action and alternatives and their impacts on the environment. Compliance with section 106 of the NHPA of 1966 has occurred parallel with the NEPA process.

Gateway NRA is federal property and is therefore excluded from the state coastal zone as required by section 304 of the Federal Coastal Zone Management Act of 1972. However, federal actions on excluded federal lands that affect any land or water use, or natural resource of the coastal zone shall be consistent with the Coastal Zone Management rules to the maximum extent practicable. Therefore, the NPS is initiating this consultation in accordance with the Coastal Zone Management Act and New York State’s Waterfront Revitalization and Coastal Resource Act of 1981. NPS has completed a New York State Department of State Coastal Management Program Federal Consistency Assessment Form for the project and attached it as Enclosure B with supporting information addressing “Yes” responses to the Policy Questions attached as Enclosure C.

NPS has determined that the proposed project to relocate the dispatch center from the Sandy Hook Unit of Gateway NRA to Building 210 at Fort Wadsworth is consistent with the New York State Department of State coastal policies.



FIGURE A-1. FORT WADSWORTH PROJECT AREA—BUILDING 210



**FIGURE A-2. PHOTOSIMULATION OF PROPOSED RADIO TOWER AND GENERATOR ENCLOSURE**



**FIGURE A-3. PHOTOSIMULATION OF PROPOSED RADIO TOWER FROM THE FRONT OF BUILDING 210**

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## NEW YORK STATE DEPARTMENT OF STATE COASTAL MANAGEMENT PROGRAM

Federal Consistency Assessment Form

An applicant, seeking a permit, license, waiver, certification or similar type of approval from a federal agency which is subject to the New York State Coastal Management Program (CMP), shall complete this assessment form for any proposed activity that will occur within and/or directly affect the State's Coastal Area. This form is intended to assist an applicant in certifying that the proposed activity is consistent with New York State's CMP as required by U.S. Department of Commerce regulations (15 Code of Federal Regulations 930.57). It should be completed at the time when the federal application is prepared. The Department of State will use the completed form and accompanying information in its review of the applicant's certification of consistency.

A. APPLICANT (please print)

1. Name: Jennifer Nersesian, Superintendent Gateway National Recreation Area
2. Address: 210 New York Avenue Staten Island, New York 10305
3. Telephone: (718) 354-4661

B. PROPOSED ACTIVITY

1. Brief description of activity:

The National Park Service is proposing to build a new, permanent, state-of-the-art dispatch center at the park headquarters building (Building 210) at Fort Wadsworth, including a new 100-foot-AGL radio tower monopole and backup generator. This dispatch center also would have the capacity to support the dispatch functions of the US Park Police, and, potentially, the Statue of Liberty National Monument. The National Park Service proposes to relocate the dispatch center from the Sandy Hook Unit of Gateway National Recreation Area (NRA) to a more resilient location within the park. Hurricane Sandy destroyed the Gateway NRA's dispatch center in the park's Sandy Hook Unit in New Jersey. The proposed relocation site is located above the floodplain at Fort Wadsworth in the park's Staten Island Unit in New York. The work includes relocating the center to an existing building and installing a 100-foot-AGL radio tower monopole with seven antennas along with a backup generator, two heat pumps, and a condenser unit.

2. Purpose of activity: The purpose of the project is to replace the temporary dispatch center with a new, permanent dispatch center at Gateway NRA at a resilient location.

3. Location of activity

Richmond County, Staten Island

Fort Wadsworth

4. Type of federal permit/license required: N/A

5. Federal application number, if known: \_\_\_\_\_

6. If a state permit/license was issued or is required for the proposed activity, identify the state agency and provide the application or permit number, if known:

C. **COASTAL ASSESSMENT** Check either "YES" or "NO" for each of these questions. The numbers following each question refer to the policies described in the CMP document (see footnote on page 2) which may be affected by the proposed activity.

1. Will the proposed activity result in any of the following: YES / NO
- |  |                          |                                     |
|--|--------------------------|-------------------------------------|
| a. Large physical change to a site within the coastal area which will require the preparation of an environmental impact statement? (11, 22, 25, 32, 37, 38, 41, 43) . . . . . | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Physical alteration of more than two acres of land along the shoreline, land under water or coastal waters? (2, 11, 12, 20, 28, 35, 44) . . . . .                           | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Revitalization/redevelopment of a deteriorated or underutilized waterfront site? (1) . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Reduction of existing or potential public access to or along coastal waters? (19, 20) . . . . .   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Adverse effect upon the commercial or recreational use of coastal fish resources? (9,10) . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Siting of a facility essential to the exploration, development and production of energy resources in coastal waters or on the Outer Continental Shelf? (29) . . . . .       | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Siting of a facility essential to the generation or transmission of energy? (27) . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h. Mining, excavation, or dredging activities, or the placement of dredged or fill material in coastal waters? (15, 35) . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i. Discharge of toxics, hazardous substances or other pollutants into coastal waters? (8, 15, 35) . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| j. Draining of stormwater runoff or sewer overflows into coastal waters? (33) . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| k. Transport, storage, treatment, or disposal of solid wastes or hazardous materials? (36, 39) . . . . .   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| l. Adverse effect upon land or water uses within the State's small harbors? (4) . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
2. Will the proposed activity affect or be located in, on, or adjacent to any of the following: YES / NO
- |  |                                     |                                     |
|--|-------------------------------------|-------------------------------------|
| a. State designated freshwater or tidal wetland? (44) . . . . .                                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Federally designated flood and/or state designated erosion hazard area? (11, 12, 17,) . . . . . | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c. State designated significant fish and/or wildlife habitat? (7) . . . . .                        | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d. State designated significant scenic resource or area? (24) . . . . .                            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e. State designated important agricultural lands? (26) . . . . .                                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f. Beach, dune or barrier island? (12) . . . . .   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| g. Major ports of Albany, Buffalo, Ogdensburg, Oswego or New York? (3) . . . . .                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| h. State, county, or local park? (19, 20) . . . . .  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| i. Historic resource listed on the National or State Register of Historic Places? (23) . . . . .   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
3. Will the proposed activity require any of the following: YES / NO
- |  |                          |                                     |
|--|--------------------------|-------------------------------------|
| a. Waterfront site? (2, 21, 22) . . . . .  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Provision of new public services or infrastructure in undeveloped or sparsely populated sections of the coastal area? (5) . . . . . | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Construction or reconstruction of a flood or erosion control structure? (13, 14, 16) . . . . .                                      | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. State water quality permit or certification? (30, 38, 40) . . . . .   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. State air quality permit or certification? (41, 43) . . . . .   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
4. Will the proposed activity occur within and/or affect an area covered by a State approved local waterfront revitalization program? (see policies in local program document) . . . . .
- |  |                                     |                          |
|--|-------------------------------------|--------------------------|
|  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|

**D. ADDITIONAL STEPS**

1. If all of the questions in Section C are answered "NO", then the applicant or agency shall complete Section E and submit the documentation required by Section F.
2. If any of the questions in Section C are answered "YES", then the applicant or agent is advised to consult the CMP, or where appropriate, the local waterfront revitalization program document\*. The proposed activity must be analyzed in more detail with respect to the applicable state or local coastal policies. On a separate page(s), the applicant or agent shall: (a) identify, by their policy numbers, which coastal policies are affected by the activity, (b) briefly assess the effects of the activity upon the policy; and, (c) state how the activity is consistent with each policy. Following the completion of this written assessment, the applicant or agency shall complete Section E and submit the documentation required by Section F.

**E. CERTIFICATION**

The applicant or agent must certify that the proposed activity is consistent with the State's CMP or the approved local waterfront revitalization program, as appropriate. If this certification cannot be made, the proposed activity shall not be undertaken. If this certification can be made, complete this Section.

"The proposed activity complies with New York State's approved Coastal Management Program, or with the applicable approved local waterfront revitalization program, and will be conducted in a manner consistent with such program."

Applicant/Agent's Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: Area Code (     ) \_\_\_\_\_

Applicant/Agent's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**F. SUBMISSION REQUIREMENTS**

1. The applicant or agent shall submit the following documents to the **New York State Department of State, Office of Coastal, Local Government and Community Sustainability, Attn: Consistency Review Unit, 1 Commerce Plaza, 99 Washington Avenue - Suite 1010, Albany, New York 12231.**
  - a. Copy of original signed form.
  - b. Copy of the completed federal agency application.
  - c. Other available information which would support the certification of consistency.
2. The applicant or agent shall also submit a copy of this completed form along with his/her application to the federal agency.
3. If there are any questions regarding the submission of this form, contact the Department of State at (518) 474-6000.

## FEDERAL CONSISTENCY DETERMINATION DISCUSSION

Based on the nature and location of the project and the project itself, relevant coastal policies relate to historic resources (**policy #23**) and **local waterfront revitalization programs**. Because there would be very little additional impervious surface (approximately 450 square feet) needed for the radio tower monopole and masonry enclosure for the backup generator, stormwater issues would be negligible. The coastal policies of New York have been addressed in detail for the proposed action and are included in the enclosure. The Environmental Consequences section below provides a summary of the coastal consistency for the project based on the defined impact intensities for this resource.

Coastal policies for the state of New York have been established by the New York State Waterfront Revitalization of Coastal Areas and Inland Waterways Act, which establish direction for the appropriate use and protection of the nation's and the state's coasts and waterways. The New York State Coastal Policies are excerpted from the New York State Coastal Management Program. The policies reflect changes that were made in 1983 and 2001. The applicable policy, or a policy summary, is provided, followed by an explanation (in italicized text) of how the project is consistent with the policy. Policies not identified in this document were determined not applicable to this project.

**POLICY 44: PROTECT, ENHANCE AND RESTORE STRUCTURES, DISTRICTS, AREAS OR SITES THAT ARE OF SIGNIFICANCE IN THE HISTORY, ARCHITECTURE, ARCHAEOLOGY OR CULTURE OF THE STATE, ITS COMMUNITIES, OR THE NATION.**

This policy dictates that all practicable means be used to protect structures, districts, areas or sites that are of significance in the history, architecture, archaeology or culture of the State, its communities or the Nation shall be deemed to include the consideration and adoption of any techniques, measures, or controls to prevent a significant adverse change to such significant structures, districts, areas or sites. Per the policy, a significant adverse change includes:

- *Alteration of or addition to one or more of the architectural, structural, ornamental or functional features of a building, structure, or site that is a recognized historic, cultural, or archaeological resource, or component thereof.*
- *Alteration of or addition to one or more of the architectural, structural, ornamental or functional features of a building, structure, or site that is a recognized historic, cultural, or archaeological resource, or component thereof.*
- *Demolition or removal in full or part of a building, structure, or earthworks that is a recognized historic, cultural, or archaeological resource or component thereof, to include all those features described in (a) above plus any other appurtenant fixtures associated with a building, structure or earthwork.*
- *All proposed actions within 500 feet of the perimeter of the property boundary of the historic, architectural, cultural, or archaeological resource and all actions within an historic district that would be incompatible with the objective of preserving the quality and integrity of the resource.*

Consultation with the New York State Historic Preservation Office throughout the planning process would avoid the adverse effects on historic, cultural, or archeological resource resources.

Building 210 and the area around it was included in the nomination for a Fort Wadsworth historic district (Lowenthal and Bathurst 1997). The district is listed only on the New York State Register of Historic Places, but the New York State Office of Historic Preservation and the National Park Service have treated the historic district as eligible for the National Register of Historic Places. Building 210, the proposed location for the dispatch center, was recommended as a contributing building in the historic district. The building is surrounded by other structures that are non-contributing features to the district.

The work on the interior of the building to accommodate a dispatch center will not affect the historic fabric. The only exterior renovations to the building would include tuck pointing of the brick mortar joints, as needed, to eliminate moisture penetration. This process would follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and would not impact the exterior appearance or character of the building. Exterior work adjacent to the western elevation of the building, including the installation of a backup generator, heat pumps, and a condenser unit would not be visible from any buildings that contribute to the historic district and would have no direct effect on the historic character of the building or the district because it would not diminish character-defining features of the building or prohibit the building from conveying its historic association as a contributing resource within the Fort Wadsworth Historic District.. It is also unlikely that any noise produced by the generator during its infrequent operation would affect the character of the district, particularly in light of the building's proximity to the approaches to the Verrazano-Narrows Bridge.

The construction of a 100-foot-AGL radio tower monopole would occur adjacent to the west side of Building 210 and would not affect the historic fabric of the building. Visual studies indicate the monopole would not adversely affect views in the historic district. The result is that the proposed action would most likely not materially affect the character of the historic district, and is therefore consistent with policy 44. Consequently it is most likely that there would be a finding of no adverse effect for this part of the project, Building 210, or the historic district.

#### **LOCAL WATERFRONT REVITALIZATION PROGRAM POLICIES**

The project area is in a location covered under the New York City Waterfront Revitalization Policy (WRP). The New York City LWRP includes two applicable policies, policy 8 and policy 10. Policy 10 is parallel to policy 44 of the state program addressed above. Policy 8 and its applicable sub-policies, which speak to provision of public access to New York City's coastal waters are discussed below (see attached New York City WRP form and checklist).

Additional WRP policies address encouraging appropriate land use in coastal areas, commercial and recreational boating, protection of natural resources and ecological systems, water quality, groundwater and source water protection, minimization of harm from flooding or erosion, minimizing environmental degradation from solid wastes and hazardous substances, and pollution prevention. The proposed action would occur mostly inside or adjacent to an existing structure in an area that is away from public access areas and is not in a floodplain, sensitive area, or immediately adjacent to the shore or in the water, and the activity itself would not generate solid or hazardous waste, and would therefore be consistent with these policies.

#### **Policy 8: Provide Public Access to and along New York City's Coastal Waters**

##### **8.1 Preserve, protect and maintain existing physical, visual and recreational access to the waterfront**

##### **8.3 Provide visual access to coastal lands, waters and open space where physically practical**

##### **8.4 Preserve and develop waterfront open space and recreation on publicly owned land at suitable locations**

The proposed action would be located on publicly owned lands in areas already used for administrative purposes. The purpose of the project would indirectly support provision of public access to the city's coastal waters by aiding public safety. Because the dispatch center is a supporting activity, the proposed location is in an existing administrative structure, and the exterior features (backup generator, radio tower monopole, heat pumps, and condenser unit) would be placed in an area in which the public would not spend much time. As a result, they would not interfere with public enjoyment of the historic and coastal resources at Fort Wadsworth, or with waterfront open space or vistas.

**Policy 10: Protect, Preserve, and Enhance Resources Significant to the Historical, Archeological, and Cultural Legacy of the New York City Coastal Area****10.1 Retain and preserve designated historic resources and enhance resources significant to the coastal culture of New York City****10.2 Protect and preserve archeological resources and artifacts**

Policy 10 is parallel to the state policy 44; a discussion of policy 44 is included above. No archeological resources would be disturbed, so the proposed action would be consistent with Subpolicy 10.2.

For Internal Use Only:

WRP no. \_\_\_\_\_

Date Received: \_\_\_\_\_

DOS no. \_\_\_\_\_

### NEW YORK CITY WATERFRONT REVITALIZATION PROGRAM Consistency Assessment Form

Proposed actions that are subject to CEQR, ULURP or other local, state or federal discretionary review procedures, and that are within New York City's designated coastal zone, must be reviewed and assessed for their consistency with the *New York City Waterfront Revitalization Program (WRP)*. The WRP was adopted as a 197-a Plan by the Council of the City of New York on October 13, 1999, and subsequently approved by the New York State Department of State with the concurrence of the United States Department of Commerce pursuant to applicable state and federal law, including the Waterfront Revitalization of Coastal Areas and Inland Waterways Act. As a result of these approvals, state and federal discretionary actions within the city's coastal zone must be consistent to the maximum extent practicable with the WRP policies and the city must be given the opportunity to comment on all state and federal projects within its coastal zone.

This form is intended to assist an applicant in certifying that the proposed activity is consistent with the WRP. It should be completed when the local, state, or federal application is prepared. The completed form and accompanying information will be used by the New York State Department of State, other state agencies or the New York City Department of City Planning in their review of the applicant's certification of consistency.

#### A. APPLICANT

1. Name: Jennifer Nersesian, Superintendent Gateway National Recreation Area
2. Address: 210 New York Avenue Staten Island, New York 10305
3. Telephone: (718) 354-4661 Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_
4. Project site owner: National Park Service

#### B. PROPOSED ACTIVITY

1. Brief description of activity:

The National Park Service is proposing to build a new, permanent, state-of-the-art dispatch center at the park headquarters building (Building 210) at Fort Wadsworth, including a new 100-foot radio tower monopole and back-up generator. This dispatch center also would have the capacity to support the dispatch functions of the US Park Police, and, potentially, the Statue of Liberty National Monument. The National Park Service proposes to relocate the dispatch center from the Sandy Hook Unit of Gateway National Recreation Area to a more resilient location within the park. Hurricane Sandy destroyed the Gateway National Recreation Area's dispatch center in the park's Sandy Hook Unit, New Jersey. The proposed relocation site is located above the floodplain at Fort Wadsworth in the park's Staten Island Unit in New York. The work includes relocating the center to an existing building and installing a 100-foot-tall radio tower monopole with seven antennas.

2. Purpose of activity:

The purpose of the project is to replace the temporary dispatch center with a new, permanent dispatch center at Gateway National Recreation Area at a resilient location.

3. Location of activity: (street address/borough or site description):

Richmond County, Staten Island

Fort Wadsworth

**Proposed Activity Cont'd**

4. If a federal or state permit or license was issued or is required for the proposed activity, identify the permit type(s), the authorizing agency and provide the application or permit number(s), if known:  
none
5. Is federal or state funding being used to finance the project? If so, please identify the funding source(s).  
yes, federal funding
6. Will the proposed project require the preparation of an environmental impact statement?  
Yes \_\_\_\_\_ No ☒ If yes, identify Lead Agency:
7. Identify **city** discretionary actions, such as a zoning amendment or adoption of an urban renewal plan, required for the proposed project.  
none

**C. COASTAL ASSESSMENT****Location Questions:**

	Yes	No
1. Is the project site on the waterfront or at the water's edge?	_____	<input checked="" type="checkbox"/>
2. Does the proposed project require a waterfront site?	_____	<input checked="" type="checkbox"/>
3. Would the action result in a physical alteration to a waterfront site, including land along the shoreline, land underwater, or coastal waters?	_____	<input checked="" type="checkbox"/>

**Policy Questions**

Yes	No
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The following questions represent, in a broad sense, the policies of the WRP. Numbers in parentheses after each question indicate the policy or policies addressed by the question. The new Waterfront Revitalization Program offers detailed explanations of the policies, including criteria for consistency determinations.

Check either "Yes" or "No" for each of the following questions. For all "yes" responses, provide an attachment assessing the effects of the proposed activity on the relevant policies or standards. Explain how the action would be consistent with the goals of those policies and standards.

4. Will the proposed project result in revitalization or redevelopment of a deteriorated or under-used waterfront site? (1)	_____	<input checked="" type="checkbox"/>
5. Is the project site appropriate for residential or commercial redevelopment? (1.1)	_____	<input checked="" type="checkbox"/>
6. Will the action result in a change in scale or character of a neighborhood? (1.2)	_____	<input checked="" type="checkbox"/>

Policy Questions cont'd	Yes	No
7. Will the proposed activity require provision of new public services or infrastructure in undeveloped or sparsely populated sections of the coastal area? (1.3)	_____	✓
8. Is the action located in one of the designated Significant Maritime and Industrial Areas (SMIA): South Bronx, Newtown Creek, Brooklyn Navy Yard, Red Hook, Sunset Park, or Staten Island? (2)	_____	✓
9. Are there any waterfront structures, such as piers, docks, bulkheads or wharves, located on the project sites? (2)	_____	✓
10. Would the action involve the siting or construction of a facility essential to the generation or transmission of energy, or a natural gas facility, or would it develop new energy resources? (2.1)	_____	✓
11. Does the action involve the siting of a working waterfront use outside of a SMIA? (2.2)	_____	✓
12. Does the proposed project involve infrastructure improvement, such as construction or repair of piers, docks, or bulkheads? (2.3, 3.2)	_____	✓
13. Would the action involve mining, dredging, or dredge disposal, or placement of dredged or fill materials in coastal waters? (2.3, 3.1, 4, 5.3, 6.3)	_____	✓
14. Would the action be located in a commercial or recreational boating center, such as City Island, Sheepshead Bay or Great Kills or an area devoted to water-dependent transportation? (3)	_____	✓
15. Would the proposed project have an adverse effect upon the land or water uses within a commercial or recreation boating center or water-dependent transportation center? (3.1)	_____	✓
16. Would the proposed project create any conflicts between commercial and recreational boating? (3.2)	_____	✓
17. Does the proposed project involve any boating activity that would have an impact on the aquatic environment or surrounding land and water uses? (3.3)	_____	✓
18. Is the action located in one of the designated Special Natural Waterfront Areas (SNWA): Long Island Sound- East River, Jamaica Bay, or Northwest Staten Island? (4 and 9.2)	_____	✓
19. Is the project site in or adjacent to a Significant Coastal Fish and Wildlife Habitat? (4.1)	_____	✓
20. Is the site located within or adjacent to a Recognized Ecological Complex: South Shore of Staten Island or Riverdale Natural Area District? (4.1 and 9.2)	_____	✓
21. Would the action involve any activity in or near a tidal or freshwater wetland? (4.2)	_____	✓
22. Does the project site contain a rare ecological community or would the proposed project affect a vulnerable plant, fish, or wildlife species? (4.3)	_____	✓
23. Would the action have any effects on commercial or recreational use of fish resources? (4.4)	_____	✓
24. Would the proposed project in any way affect the water quality classification of nearby waters or be unable to be consistent with that classification? (5)	_____	✓
25. Would the action result in any direct or indirect discharges, including toxins, hazardous substances, or other pollutants, effluent, or waste, into any waterbody? (5.1)	_____	✓
26. Would the action result in the draining of stormwater runoff or sewer overflows into coastal waters? (5.1)	_____	✓
27. Will any activity associated with the project generate nonpoint source pollution? (5.2)	_____	✓
28. Would the action cause violations of the National or State air quality standards? (5.2)	_____	✓

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Policy Questions cont'd	Yes	No
29. Would the action result in significant amounts of acid rain precursors (nitrates and sulfates)? (5.2C)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
30. Will the project involve the excavation or placing of fill in or near navigable waters, marshes, estuaries, tidal marshes or other wetlands? (5.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
31. Would the proposed action have any effects on surface or ground water supplies? (5.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
32. Would the action result in any activities within a federally designated flood hazard area or state-designated erosion hazards area? (6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
33. Would the action result in any construction activities that would lead to erosion? (6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
34. Would the action involve construction or reconstruction of a flood or erosion control structure? (6.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
35. Would the action involve any new or increased activity on or near any beach, dune, barrier island, or bluff? (6.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
36. Does the proposed project involve use of public funds for flood prevention or erosion control? (6.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
37. Would the proposed project affect a non-renewable source of sand ? (6.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
38. Would the action result in shipping, handling, or storing of solid wastes, hazardous materials, or other pollutants? (7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
39. Would the action affect any sites that have been used as landfills? (7.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
40. Would the action result in development of a site that may contain contamination or that has a history of underground fuel tanks, oil spills, or other form or petroleum product use or storage? (7.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
41. Will the proposed activity result in any transport, storage, treatment, or disposal of solid wastes or hazardous materials, or the siting of a solid or hazardous waste facility? (7.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
42. Would the action result in a reduction of existing or required access to or along coastal waters, public access areas, or public parks or open spaces? (8)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
43. Will the proposed project affect or be located in, on, or adjacent to any federal, state, or city park or other land in public ownership protected for open space preservation? (8)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
44. Would the action result in the provision of open space without provision for its maintenance? (8.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
45. Would the action result in any development along the shoreline but NOT include new water-enhanced or water-dependent recreational space? (8.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
46. Will the proposed project impede visual access to coastal lands, waters and open space? (8.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
47. Does the proposed project involve publicly owned or acquired land that could accommodate waterfront open space or recreation? (8.4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
48. Does the project site involve lands or waters held in public trust by the state or city? (8.5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
49. Would the action affect natural or built resources that contribute to the scenic quality of a coastal area? (9)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
50. Does the site currently include elements that degrade the area's scenic quality or block views to the water? (9.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Policy Questions cont'd	Yes	No
51. Would the proposed action have a significant adverse impact on historic, archeological, or cultural resources? (10)	_____	✓ _____
52. Will the proposed activity affect or be located in, on, or adjacent to an historic resource listed on the National or State Register of Historic Places, or designated as a landmark by the City of New York? (10)	✓ _____	_____

**D. CERTIFICATION**

The applicant or agent must certify that the proposed activity is consistent with New York City's Waterfront Revitalization Program, pursuant to the New York State Coastal Management Program. If this certification cannot be made, the proposed activity shall not be undertaken. If the certification can be made, complete this section.

"The proposed activity complies with New York State's Coastal Management Program as expressed in New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program, and will be conducted in a manner consistent with such program."

Applicant/Agent Name: Jennifer Nersesian, Superintendent Gateway National Recreation Area

Address: 210 New York Avenue Staten Island, New York 10305

\_\_\_\_\_ Telephone (718) 354-4661

Applicant/Agent Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for the public lands and promoting citizen participation in their care. The department also has major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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United States Department of the Interior – National Park Service