

FROGG comments at the Ratner Atlantic Yards' Hearing
8/23/06

I'm Marilyn Oliva, representing Friends and Residents of Greater Gowanus (FROGG)

We are concerned that at least the following conclusion of the DEIS is based on outdated and insufficient data:

- 1) that the frequency and volume of Combined Sewage Outfall discharges to the East River and from the Gowanus Pumping Station to the Gowanus Canal would not significantly increase with the proposed project, and that therefore there would be no significant adverse impacts on the quality of water in either the East River or the Gowanus Canal (p. 27 of exec summary; Chapt 11, p. 35 of the DEIS)

The model used to arrive at this conclusion, InfoWorks, uses the year 1988 as an average for both rainfall and storm intensity, both of which contribute to CSO's. As all local residents know, 1988 does not adequately represent either average rainfall or storm intensity, both of which have been much greater in the past 10 years, both of which are projected to be greater still as we enter a 30-year cycle of more rain and more severe storms. Any model using this average and the results it produces then is flawed and should be reconsidered with more accurate data.

Perhaps even more significant: the InfoWorks model indicates that under the best circumstances, 2 more CSO's would occur with between 15 and 18,000 more people flushing toilets into the Canal which "would not affect the quality of the water in the Canal." We would like to point out that... The currently permitted CSO's in the Gowanus Canal make it the single biggest contributor of high levels of pathogens to the New York Harbor; even two more of these events would then have a significant impact on the quality of water in the Canal, and in the Harbor. Permitting only two more of these events will thus have a significant affect on the waterways.

Finally, the DEIS addresses only permitted CSO's; the environmental impacts of unlicensed CSO's, which are common and on-going, go unaddressed. Residents from Ft Greene to Park Slope have to deal with sewage flooding their basements because the current sewage system and the Gowanus watershed cannot handle the rainfall and sewage we already produce. Antiquated sewer lines and an over-taxed watershed mean that rain and wastewater often never make it to the Red Hook or Owl's Head Water Treatment Plants; they spill out of the system causing unlicensed CSO's.

Vague promises of system upgrades do not sufficiently address the real health and safety issues that will arise with between 15 to 18,00 more residents flushing toilets into an already overtaxed system.