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**NOTICE OF COMPLETION OF THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
For the  
PROPOSED CEDAR GROVE BEACH REHABILITATION**

**DATE ISSUED:** November 3, 2011  
**CEQR No.** 11DPR004R  
**ULURP No.** n/a  
**SEQR Classification:** Type I  
**Lead Agency:** New York City Department of Parks and Recreation (NYCDPR)  
**Location:** Staten Island, New York  
Block 4105 p/o Lot 50 and Block 4108 p/o Lot 45;

The project site is located in Great Kills Park, a 307 acre park, which extends from Miller Field to Great Kills Gateway National Recreation Area, along Lower New York Bay, in Staten Island. Cedar Grove Beach is comprised of approximately 30 acres located south of Ebbitts Street

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Pursuant to City Environmental Quality Review, Mayoral Executive Order No. 91 of 1977, and the City Environmental Quality Review Rules of Procedure found at Title 62, Chapter 5 of the Rules of the City of New York (CEQR), and the State Environmental Quality Review Act, Article 8 of the New York State Environmental Conservation Law and its implementing regulations found in Part 617 of 6 NYCRR (SEQRA), a Draft Environmental Impact Statement (DEIS) has been prepared for the action described below and is available for review from the office listed on the last page of this notice and the DEIS can also be downloaded from the New York City Department of Parks and Recreation's (NYCDPR) website at: <http://www.nyc.gov/parks/cedargroveeis>.

An Environmental Assessment Statement (EAS) for the Proposed Action was completed and submitted to the public on February 10, 2011. Acting as the lead agency, NYCDPR determined that the proposed action would have the potential for significant adverse environmental impacts on the following areas of concern: Land Use, Zoning and Public Policy; Historic and Cultural Resources; Natural Resources; Hazardous Materials; Transportation; Neighborhood Character and Construction Impacts. Therefore, a detailed assessment of likely effects in these areas of concern was prepared and disclosed in this targeted DEIS. The Proposed Action will result in an impact to Open Space, but the impact will be a positive one. The rehabilitation of Cedar Grove Beach would revitalize the existing open space and formalize existing recreation areas within the park. Further, a beachfront recreational area would be created for the general public's use and enjoyment. Therefore, Open Space is addressed in this targeted DEIS but is not expected to result in a significant adverse impact.



The remaining CEQR impact categories underwent a screening analysis as part of an Environmental Assessment Statement (EAS) for the proposed action. Under guidelines specified in the *CEQR Technical Manual*, it has been determined that for these remaining categories, no significant adverse impacts are anticipated and a detailed analysis is not required. The remaining categories include: Socioeconomic Conditions; Community Facilities and Services; Shadows; Urban Design and Visual Resources; Water and Sewer Infrastructure; Solid Waste and Sanitation Services, Energy; Air Quality; Greenhouse Gas Emissions; Noise; and Public Health. Consequently, these environmental categories are not assessed in the DEIS. The EAS prepared for the proposed action is provided as Appendix E of the DEIS report.

A draft scoping document that set forth the analyses and methodologies proposed for a Draft Environmental Impact Statement (DEIS) was submitted to the public on February 10, 2011. The public, involved and interested agencies, Staten Island Community Board 2 and elected officials were invited to comment on the scope, either in writing or orally, at a public scoping meeting held on Wednesday, March 16, 2011, between the hours of 7:00 PM and 9:00 PM at Community Board 2, Lou Caravone Community Service Building, 460 Brielle Avenue, Staten Island, NY 10301. Comments received during the public meeting, and written comments received up to 10 days after the hearing, were considered and incorporated as appropriate into a final scope of work. The final scope of work was used as a framework for preparing this DEIS for the proposed action. The final scoping document was issued on August 19, 2011.

A public hearing on the Draft Environmental Impact Statement (DEIS) will be held on Thursday, November 17, 2011, between the hours of 7:00 p.m. and 9:00 p.m. at Community Board 2, Lou Caravone Community Service Building, 460 Brielle Avenue, Staten Island, New York, 10301. Written comments on this DEIS should be forwarded to the contact office listed on the last page of this notice, and will be accepted by the NYCDPR through Friday, December 2, 2011.

## **A. PROJECT IDENTIFICATION AND DESCRIPTION**

The proposed action involves the rehabilitation of a portion of Cedar Grove Beach, with the main goal being to provide improved access to this area for the general public. The project site currently contains a number of structures, which had been used for private seasonal summer occupancy by members of the Cedar Grove Beach Club. Pursuant to a written agreement between the Parks Department and the Cedar Grove Beach Club, the bungalows were vacated by September 30, 2010. Some of these structures are anticipated to be adaptively reused, while others are proposed for demolition. In addition to the opening of the beach area for public swimming, the existing pick-up sports play area would be opened for public use. New fencing would be installed along Ebbitts Street and the existing playground would be removed and replaced with new children's play equipment.

The New York State Office of Parks, Recreation and Historic Preservation (OPRHP) has determined that the Cedar Grove Beach Club at Cedar Grove Beach constitutes a State/National Register of Historic Places (S/NRHP)-eligible historic district. Known as the Cedar Grove Beach Club Historic District, it is eligible for listing as the last beach colony surviving on Staten Island with a collection of early-20<sup>th</sup> century bungalows/cottages that have retained their original design and construction detail. Although the New York City Landmarks Preservation Commission (NYCLPC) has determined that the historic district does not qualify as local historic district, the NYCLPC concurs with OPRHP that it is S/NRHP-eligible. As part of the Proposed Action, which was developed in consultation with the OPRHP, seven resources within the eligible Cedar Grove Beach Club Historic District would be retained, rehabilitated, and adaptively reused by NYCDPR for public and ancillary park uses, including five bungalows (Buildings 1, 4, 7, 9A and 71), the Club House (Building 78) and the Barn, with surrounding landscapes stabilized and enhanced for NYCDPR beach and recreation programs.

As a result of the proposed action, 43 structures on the project site would be demolished in order to restore the beach for optimal public use, and improve public access to the coastal area. The structures to be demolished include 37 bungalows, five garages, and the guard house. Construction of the project is divided into two phases<sup>1</sup>: Phase one includes demolition of a majority of the structures on site and

<sup>1</sup> Rehabilitation of building #4 was contemplated as part of a separate project undergoing separate review(11DPR011R) in consultation with NYSOPRHP and NYCDPR. Steiner Studios/HBO performed minor rehabilitation of the building for use in a television production.



adaptive reuse of some structures for park related purposes. This work will include the shutdown and capping of utilities and removal of in-ground and/or above ground oil tanks as necessary, as well as abatement of any hazardous materials found pursuant to all applicable local, state and federal regulations. NYCDPR will restore the demolition sites with beach grass and other native plantings. Phase one will include installation of a new bike path/greenway, installation of fencing and consolidation of parking on site into an overflow parking area near Ebbitts Street (parking would be limited to the overflow lawn parking area closest to the park entrance at Ebbitts Street). Phase two involves construction of a new playground, minor rehabilitation of the existing pick up sport play area, and adaptive reuse of other structures on site. Renovations on the project site are anticipated to be complete in the year 2014.

A portion of the beach was opened to the public in May 2011. Temporary mobi mats were placed along the beach to provide inclusive access to the water. Also on a temporary basis two trailers were placed along the beach. One trailer was used as a summer lifeguard headquarters and the other served as a seasonal comfort station for the 2011 beach season. As part of a separate review, foundation remains and debris on the beach off Ebbitts Street and Cedar Grove Court are being removed. The removal of the foundation remains, a project of independent utility to the adjacent New Dorp Beach, is scheduled to be completed by the fall of 2011, prior to the build year of the Cedar Grove Beach Rehabilitation project.

## **B. REQUIRED APPROVALS AND REVIEW PROCEDURES**

In order to implement the removal of existing structures and rehabilitation of the Cedar Grove Beach project site, the Proposed Action requires the following public approvals, consultation, and review procedures:

### New York City

- NYC Department of Buildings (DOB) approval for demolition plans.
- Coastal Zone consistency determination.

### New York State/Federal

- New York State Department of Environmental Conservation (NYSDEC) Freshwater and/or Tidal Wetlands Permit.
- NYS DEC Coastal Erosion Hazard Areas Approval.
- NYS DEC State Pollution Discharge Elimination System (SPDES) permit for stormwater discharges associated with construction activities.
- NYS DEC must consult with the New York State Office of Parks Recreation and Historic Preservation (OPRHP) pursuant to § 1409 of the Parks, Recreation and Historic Preservation Law.
- Letter of Resolution between NYSDEC, OPRHP, and NYCDPR to document the alternatives to retain the district, the process to minimize harm and mitigation measures to be included in the project

The proposed project does not require a US ACOE § 404 Clean Water Act Permit, as determined by the Army Corps of Engineers.

Under the State Environmental Quality Review Act (SEQRA), the NYCDPR must undertake a review of the possible environmental impacts of the proposed project. This DEIS has been prepared to assist and guide decision makers in reaching their conclusions and to ensure that they have a full understanding of the environmental consequences of the proposed action and its alternatives. The regulations are intended to permit the analysis of environmental factors and to clarify social and environmental issues in the early planning and decision-making stage of major projects. This assessment provides a way to systematically consider environmental effects with other aspects of project planning and design.

The proposed action is subject to SEQRA and its implementing regulations set forth in Title 6 of the New York Codes, Rules and Regulations (6 NYCRR) Part 617. Actions determined not to have a significant impact on the environment, or Type II actions as promulgated by 6 NYCRR Part 617.5, are not subject to environmental review. Actions that are subject to environmental review are Type I actions and Unlisted actions. Type I actions are those actions that are listed in 6 NYCRR Part 617.4. Unlisted actions are all other actions not listed as Type I or Type II. The project site is located in the State/National Register-



actions. Type I actions are those actions that are listed in 6 NYCRR Part 617.4. Unlisted actions are all other actions not listed as Type I or Type II. The project site is located in the State/National Register-eligible Cedar Grove Beach Club Historic District and within publicly owned parkland. For this reason, the proposed action is classified as a Type I action, pursuant to the New York State Environmental Quality Review Act (SEQRA), 6 NYCRR Part 617.4 (b) (9) and (b) (10).

### **C. POTENTIAL IMPACTS OF THE PROPOSED PROJECT**

#### **LAND USE, ZONING, AND PUBLIC POLICY**

The analysis in the DEIS concluded that no significant adverse land use or zoning impacts would occur as a result of the Proposed Action. Zoning is not applicable to lands under the jurisdiction of NYCDPR. Additionally, the type of land use is not changing, as the area is currently parkland and will remain parkland in the future. The project is located within the Waterfront Revitalization Program (WRP) boundaries and, therefore, was assessed for consistency with New York City's Waterfront Revitalization Program. As discussed in this DEIS the proposed action would not conflict with the WRP policies. In addition, the proposed action would not conflict with the policies of the PlaNYC and the Staten Island Growth Management Plan. Thus, no significant adverse impacts to public policy are expected as a result of the Proposed Action.

#### **HISTORIC AND CULTURAL RESOURCES**

The Historic and Cultural Resources analysis presented in the DEIS concluded that the Proposed Action would lead to a significant adverse effect on the S/NRHP-eligible Cedar Grove Beach Club Historic District. However, the Proposed Action calls for seven resources within the eligible historic district, including five bungalows (Buildings 1, 4, 7, 9A and 71), Club House (Building 78), and the Barn, to be adaptively reused and the surrounding landscape to be restored and upgraded for public beach and recreation uses. As the Proposed Action would lead to a significant adverse effect on the eligible Cedar Grove Beach Club Historic District, mitigation measures would need to be explored and implemented, in coordination with OPRHP.

With regard to archaeological resources, the DEIS concluded that if final designs for the Proposed Action involve ground disturbance in areas within the Cedar Grove Beach property noted as moderately or highly sensitive for archaeological resources in the *Phase IA Archaeological Documentary Study*, NYCDPR will coordinate with OPRHP and NYCLPC to determine if and how limited Phase IB field testing would be undertaken once the degree of disturbance to the ground surface in these locations is identified.

To mitigate the significant adverse effect of the Proposed Action on the eligible Cedar Grove Beach Club Historic District, NYCDPR and OPRHP will coordinate the selection of the appropriate mitigation measures. This agreement, documented in a Letter of Resolution (LOR) between NYCDPR, OPRHP, and New York State Department of Environmental Conservation (DEC) will describe the actions to be undertaken by NYCDPR. First, NYCDPR will record the eligible historic district and, second, protect the resources to remain while rehabilitating them according to OPRHP and NYC Department of Buildings standards. Potential mitigation measures are described below.

#### **Historic and Cultural Resources Mitigation**

##### *Documentation*

The eligible Cedar Grove Beach Club Historic District would be documented to Historic American Buildings Survey (HABS) standards prior to implementation of the proposed action. The scope and content of the HABS documentation was defined in coordination with OPRHP. HABS documentation typically includes a physical description of the overall historic district, including setting; brief physical descriptions of the interior and exterior of buildings and structures, including significant alterations; historic context illustrated by historic photographs and/or maps; and large-format black-and-white photographs of the historic district. OPRHP would also assist NYCDPR in identifying adequate repositories for copies of the documentation.



### *Construction Protection Plan*

The first phase of implementation of the Proposed Action requires removal of 43 buildings and structures from the eligible Cedar Grove Beach Club Historic District. Because seven buildings would be adaptively reused, a construction protection plan should be developed to protect them during the building demolition phase. As indicated in the *CEQR Technical Manual*, the plan would be developed in coordination with OPRHP and professional engineers appointed by NYCDPR. Elements of the plan may include the following:

- Existing foundation and structural condition information for the seven buildings to be reused.
- Protection from falling objects.
- Monitoring during construction using tell-tales, and horizontal and lateral movement scales

Several reference documents also provide useful information on the development of construction protection plans, including "Technical Policy and Procedures Notice No. 10/88, Procedures for the Avoidance of Damage to Historic Structures Resulting from Adjacent Construction" prepared by NYCDOB, and "Protecting a Historic Structure During Adjacent Construction" prepared by the National Park Service (NPS). NYCDPR could also prepare a means and methods plan for how the demolition and construction will proceed on site to ensure that elements to remain (e.g. buildings, structures, trees, landscaping paths) are protected during construction.

### *Mothballing*

It is anticipated that the seven buildings would be adaptively reused. In order to ensure that the seven buildings are adequately preserved prior to renovation, they would be mothballed in general accordance with *Preservation Brief 31: "Mothballing Historic Buildings,"* available through NPS. Key elements of mothballing are noted below:

- Document the architectural and historical significance of the building, including character-defining features.
- Prepare a condition assessment of the building.
- Structurally stabilize the building, based on the condition assessment.
- Exterminate or control pests.
- Protect the exterior from moisture penetration.
- Secure the building and its component features to reduce vandalism or break-ins.
- Provide adequate ventilation to the interior.
- Secure or modify utilities and mechanical systems.
- Develop and implement a maintenance and monitoring plan for protection (Park, 1993).

### *Context-Sensitive Design*

As planned, the seven buildings will be rehabilitated in coordination with OPRHP. It is anticipated that the adaptive reuse will be done in a manner that preserves their historic character-defining features.

## **NATURAL RESOURCES**

The Natural Resources assessment in the DEIS determined that no significant adverse natural resources impacts are expected as a result of the Proposed Action. The topography, geology and soils of the site would not undergo substantial modification, nor would habitats be modified or flora and fauna on the project site be significantly affected. The beach would continue to be utilized in the same manner as currently occurs.

The topography, geology, and soils of the project site would not undergo substantial modification. The removal of the bungalows and creation of sand dunes in their place would result in a rolling topography near the beach. This topography and soils would be similar to the historic materials that formed the coastline. The underlying geology of Staten Island and the site would not be altered by way of the proposed action.



Under the proposed action, there would be some modification of the existing habitats. Most of the habitats would remain unchanged; however, some areas of grass lawns and grass lawns with trees near the bungalows would be converted to parking spaces, a playground, and a footpath. Also, many of the existing bungalows would be removed and the areas replanted with native dune vegetation. These actions would result in a net positive increase of ecological value for the site. Grass lawns are habitats of limited ecological value. The loss of grass lawns would be offset by the creation of maritime dune vegetation, a much more limited resource. Moreover, the maritime dune vegetation would provide increased habitat areas for the state endangered species, beach sandbur, to exist.

Most of the fauna that utilize the site now are species common to urban and suburban environments. During construction, some of these species may be displaced; however, the large tracts of undeveloped land adjacent to the site could accommodate any displacement. Once construction is completed, the new habitats, especially the maritime dune communities, would provide attractive habitat to various fauna.

The proposed action would not have any impact on Bird Conservation Areas, Critical Environmental Areas, or Significant Coastal Fish and Wildlife Habitats, as these resources do not occur on and/or immediately adjacent to the site. It is anticipated the project would have a net positive impact on the Coastal Erosion Hazard Area (CEHA). The project would remove existing man-made structures within the CEHA and replace those areas with planted dune vegetation.

As the Proposed Action would involve work within New York State's freshwater and tidal wetlands and/or regulated adjacent areas, the Project Sponsors would coordinate with the NYSDEC pursuant to the state's Freshwater Wetlands Regulatory Program and Tidal Wetlands Permit Program. In addition, the NYSDEC likely would require authorization of a Section 401 Water Quality Certification to ensure that proposed work under the Proposed Action within state regulated waters and/or wetlands do not contravene state water quality standards. Best management practices for the control of sedimentation and erosion would be required to control potential silt and sediment releases to surface waters and wetlands. The United States Army Corps of Engineers (USACE) indicated that a USACE permit would not be required, as the rehabilitation of Cedar Grove Beach is not anticipated to involve dredging, placement of any dredged or fill material, or construction activities over any navigable waters or waterbodies of the United States. Based on the final construction plans prepared under the Proposed Action, the Project Sponsors will continue to coordinate with NYSDEC and USACOE and all applicable permits will be sought as needed.

It is anticipated that the Proposed Action would not adversely impact tidal wetland areas and/or regulated adjacent areas. Nor would it adversely impact freshwater wetland areas and/or regulated adjacent areas. The Proposed Action primarily involves removal of manmade structures and impervious surfaces within regulated areas and replacement of these impervious materials with native plantings and landscaping. Thus, the Proposed Action would not have a significant negative effect upon the ecological value of the tidal or freshwater wetlands.

### **Natural Resources Mitigation**

Based on the final construction plans prepared under the Proposed Action, the Project Sponsors will continue to coordinate with relevant agencies and all applicable permits will be sought as needed. It is anticipated that disturbance of regulated wetlands or adjacent areas would require a NYSDEC permit and could potentially require mitigation. In order to obtain a Freshwater Wetlands Act permit, a project must meet the permit standards in 6NYCRR Part 663 and be consistent with the public health, safety, and welfare. The project must also avoid impacts to wetlands, and if unavoidable, must minimize impacts. Project sponsors may use mitigation to offset residual impacts in wetlands in order to meet regulatory weighing standards (NYSDEC, 2005). A component of this proposed project is the potential removal of bungalows and impervious structures from the regulated adjacent areas. These structures would be replaced with native dune vegetation; thus, a net positive ecological benefit to the regulated adjacent area would occur through implementation of the Proposed Action.

### **HAZARDOUS MATERIALS**

The hazardous materials analysis presented in the DEIS concluded that, based on the findings of the Phase I Environmental Site Assessment (ESA) prepared for the project site, no known recognized environmental conditions (RECs) associated with the project site were identified. Further, based on field



observations made during the site reconnaissance and a review of available documents, no evidence of underground storage tanks were identified on the project site. There is potential, based on the age of the buildings on the project site, that lead-based paints and/or asbestos containing material (ACM) are present. As part of the overall rehabilitation of the project site, the New York City Department of Parks and Recreation is committed to the proper removal of lead-based paints and/or ACM on the project site, in accordance with all applicable federal, state and city standards. Therefore, no significant adverse hazardous materials impacts are expected as part of the proposed action.

## **TRANSPORTATION**

### **Traffic**

The result of the traffic analysis shows that the westbound approach to the signalized Mill Road and Ebbitts Street intersection is projected to experience potentially significant traffic impacts during both weekend peak hours under the future action condition. During the weekend midday peak hour, delays for motorists on the westbound approach (on Ebbitts Street) are projected to increase from 38.9 seconds per vehicle (LOS "D") under future without the proposed action conditions, to 81.2 seconds per vehicle (LOS "F") under future action conditions. During the weekend PM peak hour, delays for motorists on the westbound approach are projected to increase from 32.1 seconds per vehicle (LOS "C") under future without the proposed action conditions, to 90.4 seconds per vehicle (LOS "F") under future with the proposed action conditions. No significant traffic impacts are projected to occur at the stop-controlled intersection of Cedar Grove Avenue and Ebbitts Street during either analysis peak hour as a result of the proposed action.

#### *Traffic Mitigation*

To mitigate potential traffic impacts identified in the DEIS, a signal-phasing improvement is recommended. Specifically, at Mill Road and Ebbitts Street, it is recommended that three (3) seconds of green time from the north-south phase be re-allocated to the east-west phase during the weekend afternoon (midday and PM) peak period. This analysis and recommendation for traffic mitigation has been shared in full with the New York City Department of Transportation (NYCDOT).

This improvement is designed to accommodate the future traffic volumes projected to occur on the roadway network during critical periods of peak traffic activity under the future with the proposed action condition; specifically, during the peak 15-minute period of the weekend midday and PM peak hours. With this recommended improvement in place, the potential traffic impacts during the weekend midday and PM peak hours can be mitigated.

### **Parking**

The parking assessment of the DEIS concluded that future on-street parking demand on a typical weekend day is projected to continue to remain under-capacity under Future Action conditions, with parking utilization rates not exceeding approximately 69 percent. Furthermore, on-street parking demand increases of the magnitudes described above are less than the CEQR threshold for significant adverse parking impacts (i.e., the projected parking demand must exceed half of the available parking capacity in the study area for a significant adverse parking impact). Two off-street parking lots will provide sufficient parking for visitors during the operating hours of the beach, on both weekdays and weekends. Additional parking spaces are also available within the ¼-mile study area to accommodate any overflow parking demand. Therefore, no significant adverse parking impacts are projected to occur as a result of the proposed project.

### **Transit**

As concluded in the transit assessment of the DEIS, the number of transit trips generated by the Proposed Action would be minimal and would not exceed the 200-trip preliminary screening threshold for transit trips in the midday or PM weekend peak hours. Thus it is unlikely that significant adverse transit impacts would occur as a result of the Proposed Action.



## **Pedestrian**

As concluded in the pedestrian assessment of the DEIS, the number of pedestrian trips generated by the Proposed Action would be minimal and would not exceed the 200-trip preliminary screening threshold for pedestrian trips in the midday or PM weekend peak hours. Thus it is unlikely that significant adverse pedestrian impacts would occur as a result of the Proposed Action.

## **NEIGHBORHOOD CHARACTER**

As discussed in the DEIS, overall, the proposed action is not expected to result in a significant adverse neighborhood character impact. In the future with the action, the Cedar Grove Beach project site would be rehabilitated and public accessibility would be improved, including the preservation and adaptive reuse of select historic resources. The project site's natural features would be enhanced by the proposed action, including views of the beach and waterfront. Therefore, although the proposed action would alter the character of the neighborhood by removing some resources on site, the change would not constitute a significant adverse impact to the overall surrounding neighborhood character.

## **CONSTRUCTION IMPACTS**

As discussed in the DEIS, although some temporary construction-related impacts would occur during demolition of existing structures and the restoration of the Cedar Grove Beach project site, it is not expected that construction activities would result in any significantly adverse construction-related impacts. Construction protection plans would be developed to mitigate the adverse effects caused by construction, specifically for the historic structures that are proposed to remain on the project site, and to ensure the integrity of high and moderately sensitive archeological areas during construction activities. Further, significant adverse construction-related impacts are not expected on natural resources, hazardous materials, transportation, open space, socioeconomic conditions, community facilities, land use and public policy, neighborhood character or infrastructure. Any construction impacts related to air quality or noise would be of limited duration and measures would be followed to minimize fugitive dust or construction noise levels. Thus, no significant adverse construction impacts are expected as a result of the proposed action.

## **MITIGATION**

### **Historic and Cultural Resources**

To mitigate the significant adverse effect of the Proposed Action on the eligible Cedar Grove Beach Club Historic District, NYCDPR and OPRHP would coordinate to select the appropriate mitigation measures. This agreement, documented in a Letter of Resolution (LOR) between NYCDPR, OPRHP, and NYSDEC will describe the actions to be undertaken by NYCDPR. First, NYCDPR will record the eligible historic district and, second, protect the resources to remain while rehabilitating them according to OPRHP and NYC Department of Buildings standards.

#### *Documentation*

The eligible Cedar Grove Beach Club Historic District would be documented to Historic American Buildings Survey (HABS) standards prior to implementation of the proposed action. The scope and content of the HABS documentation was defined in coordination with OPRHP. HABS documentation typically includes a physical description of the overall historic district, including setting; brief physical descriptions of the interior and exterior of buildings and structures, including significant alterations; historic context illustrated by historic photographs and/or maps; and large-format black-and-white photographs of the historic district. OPRHP would also assist NYCDPR in identifying adequate repositories for copies of the documentation.

#### *Construction Protection Plan*

The first phase of implementation of the Proposed Action requires removal of 43 buildings and structures from the eligible Cedar Grove Beach Club Historic District. Because seven buildings would be adaptively reused, a construction protection plan should be developed to protect them during the building demolition



phase. As indicated in the *CEQR Technical Manual*, the plan should be developed in coordination with OPRHP and professional engineers appointed by NYCDPR. Elements of the plan may include the following:

- Existing foundation and structural condition information for the seven buildings to be reused.
- Protection from falling objects.
- Monitoring during construction using tell-tales, and horizontal and lateral movement scales

Several reference documents also provide useful information on the development of construction protection plans, including "Technical Policy and Procedures Notice No. 10/88, Procedures for the Avoidance of Damage to Historic Structures Resulting from Adjacent Construction" prepared by NYCDOB, and "Protecting a Historic Structure During Adjacent Construction" prepared by NPS. NYCDPR could also prepare a means and methods plan for how the demolition and construction will proceed on site to ensure that elements to remain (e.g. buildings, structures, trees, landscaping paths) are protected during construction.

#### *Mothballing*

It is anticipated that the seven buildings would be adaptively reused. In order to ensure that the seven buildings are adequately preserved prior to renovation, they should be mothballed in general accordance with *Preservation Brief 31: "Mothballing Historic Buildings,"* available through NPS. Key elements of mothballing are noted below:

- Document the architectural and historical significance of the building, including character-defining features.
- Prepare a condition assessment of the building.
- Structurally stabilize the building, based on the condition assessment.
- Exterminate or control pests.
- Protect the exterior from moisture penetration.
- Secure the building and its component features to reduce vandalism or break-ins.
- Provide adequate ventilation to the interior.
- Secure or modify utilities and mechanical systems.
- Develop and implement a maintenance and monitoring plan for protection (Park, 1993).

#### *Context-Sensitive Design*

The seven buildings will be rehabilitated as needed in coordination with OPRHP. It is anticipated that the adaptive reuse will be done in a manner that preserves their historic character-defining features.

#### **Natural Resources**

Based on the final construction plans prepared under the Proposed Action, the Project Sponsors will continue to coordinate with relevant agencies and all applicable permits will be sought as needed. It is anticipated that disturbance of regulated wetlands or adjacent areas would require a NYSDEC permit and could potentially require mitigation. In order to obtain a Freshwater Wetlands Act permit, a project must meet the permit standards in 6NYCRR Part 663 and be consistent with the public health, safety, and welfare. The project must also avoid impacts to wetlands, and if unavoidable, must minimize impacts. Project sponsors may use mitigation to offset residual impacts in wetlands in order to meet regulatory weighing standards (NYSDEC, 2005). A component of this proposed project is the potential removal of bungalows and impervious structures from the regulated adjacent areas. These structures would be replaced with native dune vegetation; thus, a net positive ecological benefit to the regulated adjacent area would occur through implementation of the Proposed Action.



## **Traffic and Parking**

To mitigate potential traffic impacts identified in the DEIS, a signal-phasing improvement is recommended. Specifically, at Mill Road and Ebbitts Street, it is recommended that three (3) seconds of green time from the north-south phase be re-allocated to the east-west phase during the weekend afternoon (midday and PM) peak period. Again, this analysis and recommendation for traffic mitigation has been shared in full with the New York City Department of Transportation (NYCDOT).

This improvement is designed to accommodate the future traffic volumes projected to occur on the roadway network during critical periods of peak traffic activity under the future with the proposed action condition; specifically, during the peak 15-minute period of the weekend midday and PM peak hours. With this recommended improvement in place, the potential traffic impacts during the weekend midday and PM peak hours can be mitigated.

## **ALTERNATIVES**

The DEIS considers three alternatives to the proposed action, to examine reasonable and practicable options that avoid or reduce action-related significant adverse impacts and may still allow for the achievement of the stated goals and objectives of the Proposed Action. The DEIS includes the analysis of a No-Action Alternative which examines future conditions within the project site assuming the absence of the Proposed Action. In addition to the No-Action Alternative, the DEIS assessed two alternatives to the Proposed Action and considered their ability to achieve the goals and objectives of the Proposed Action. The first alternative assessed is the Complete Demolition and Rebuild Alternative, under which all resources within the eligible Cedar Grove Beach Club Historic District would be demolished, landscapes would be restored and stabilized, and a new facility to support beach and recreation operations would be constructed. The second alternative assessed is the Full Restoration Alternative under which all resources within the eligible Cedar Grove Beach Club Historic District would be retained and rehabilitated, including the stabilization and restoration of surrounding landscapes for beach and recreation uses.

### **No-Action Alternative**

The DEIS determined that under the No-Action Alternative all resources that comprise the eligible S/NRHP-eligible Cedar Grove Beach Historic District would be retained, it is anticipated that the No-Action Alternative would likely have a negative effect on the S/NRHP-eligible Cedar Grove Beach Club Historic District because the resources within it would suffer severe deterioration from exposure to the elements. This would ultimately result in deterioration of resources within the eligible historic district, which in turn would have a negative effect on neighborhood character. In addition, the No-Action Alternative does not meet the purpose and need of the project, which is to rehabilitate Cedar Grove Beach through expansion of public access, improvement of recreational resources, and preservation of select resources within the S/NRHP-eligible Cedar Grove Beach Historic District. The No-Action Alternative would limit public access because it would become necessary to fence off the approximately 19 acres occupied by the resources for security and public safety purposes. The restoration of select bungalows would not occur under the No-Action Alternative. Thus, the resources needed by NYCDPR for maintenance and operations purposes and the public in the form of public amenities typically provided at public beaches, such as a food concession and comfort station, would not be provided and trailers would be brought in seasonally to serve as both lifeguard and comfort stations.

### **Complete Demolition and Rebuild Alternative**

The DEIS determined that while the Complete Demolition and Rebuild Alternative would serve the programmatic goals of the project, it would result in an adverse effect on the eligible Cedar Grove Beach Historic District, as all structures that comprise the district would be demolished. Historic landscape elements such as plantings, trees, paths and recreation features would be retained, but their presence alone would not contribute to the beach colony environment identified in the S/NRHP eligibility determination. Thus, the Complete Demolition and Rebuild Alternative would not meet the preservation goals as set forth in the project purpose and need for the Proposed Action.



## **Full Restoration Alternative**

The DEIS determined that while the Full Restoration Alternative would be beneficial to the eligible historic district it is not a feasible alternative to the Proposed Action due to the size, complexity and significant cost required to implement this alternative. NYCDPR does not have the financial capacity or appropriate park related program uses needed to sustain the resources within the historic district under this alternative, or to justify the expense of public funding. Furthermore, 11 of the resources are in a highly compromised area of the CEHA, south of the southern jetty (buildings 27, 28, 29, 30, 31, 32, 33, 33A, 34, 35, and 36) leaving them especially vulnerable to being damaged or destroyed by future storm events and sea-level rise. It would not be fiscally responsible or in the public's best interest to rehabilitate those structures. The site is exceedingly vulnerable to future storm damage, as witnessed by the degradation of the beach and the structures as a result of historic storms and, most recently, Tropical Storm/Hurricane Irene in August, 2011. Given the lack of appropriate park related programmatic needs, the vulnerability of the site to future storm damage and the high costs associated with this alternative, it was concluded that the Full Restoration Alternative would not meet the goals of the project.

## **UNAVOIDABLE ADVERSE IMPACTS**

As discussed in the DEIS, the demolition of the 43 resources on the project site constitutes a significant adverse impact. Recommended mitigation measures include HABS documentation, preparation of a construction protection plan, mothballing, and context-sensitive design. Although such actions would document the eligible historic district for posterity and guide the rehabilitation of the remaining seven buildings in a historically appropriate manner, the eligible historic district would cease to exist in its present form. Thus, despite the mitigation measures, the significant adverse impact to historic and cultural resources as a result of the Proposed Action would not be completely eliminated. Therefore, the Proposed Action would result in an unavoidable adverse impact to the eligible Cedar Grove Beach Club Historic District.

## **GROWTH INDUCING ASPECTS OF THE PROPOSED ACTION**

As discussed in the DEIS, the proposed action could also lead to nominal growth due to the employment and fiscal effects generated during the construction phase of the proposed project. Finally, the proposed action would not introduce or expand infrastructure capacity as most of the buildings on site would be removed, and the buildings that remain would be adaptively reused, including the reuse of the existing sewage and water supply systems.

## **IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES**

As discussed in the DEIS, the proposed action would require the irreversible and irretrievable commitment of energy, construction materials, human effort, and funding. The buildings and structures removed in the State/National Register-eligible Cedar Grove Beach Club Historic District may be considered a resource loss and potential impacts are disclosed in the DEIS. The rehabilitation of the Cedar Grove Beach under the proposed action constitutes a long-term commitment to the operation of the project site as a beach and open space resource, rendering land use for other purposes improbable. Further, funding committed to the design, construction, and operation of the Cedar Grove Beach project site as part of the proposed action would not be available for other projects.



**CEQR No.** 11DPR004R  
**ULURP No.** n/a  
**SEQR Classification:** Type I  
**Location:** Staten Island, New York

Block 4105 p/o Lot 50 and Block 4108 p/o Lot 45;

The project site is located in Great Kills Park, a 307 acre park, which extends from Miller Field to Great Kills Gateway National Recreation Area, along Lower New York Bay, in Staten Island. Cedar Grove Beach is comprised of approximately 30 acres located south of Ebbitts Street

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The DEIS can be downloaded from NYCDPR's website at: <http://www.nyc.gov/parks/cedargroveeis>



Joshua Laird, Assistant Commissioner for Planning & Parklands  
New York City Department of Parks & Recreation

11 / 3 / 11  
Date