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Owen Wells, Director of Environmental Review
New York City Department of Parks and Recreation
The Arsenal, Central Park
830 Fifth Avenue, Room 401
New York, New York 10065

June 19, 2017

Dear Mr. Wells,

NYC H2O is pleased to submit the attached comments on the NYC Department of Parks & Recreation's Critical Environmental Area proposal. Some main points include:

- The NWI Wetlands map should be updated to reflect the wetlands in Basin 3 that the application acknowledges to exist therein
- NYC H2O drafted and submitted the Historical Register nomination
- NYC H2O conducted a survey about the Reservoir with 341 respondents. The results show that a majority of people would like to see the gatehouses repurposed as an interpretive center.
- There were two pumping stations that serviced the Ridgewood Reservoir on Atlantic Avenue
- What is referred to as a "pumphouse" in Basin 2 is in fact a "gatehouse."

Additionally, the CEA should let the public better understand how Parks proposes to address some salient remaining issues, to wit:

- How will Parks ensure that all three basins are designated wetlands as indicated in the CEA application?
- How is Parks proposing to treat particular invasive species whose impact is documented: e.g., satellite photos are showing the encroachment of Phragmites in Basin 2?

Thank you in advance for your consideration of these comments, and looking forward to hearing back from you and in seeing their incorporation into the final CEA designation.

Sincerely,

Matt Malina
Director, NYC H2O



Worth noting in the Critical Environmental Area application

Please note that the page numbers refer to the page numbers of the PDF.

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The only other existing CEA within New York City is Jamaica Bay, designated in 1990.

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Designation as a CEA would supplement existing SEQRA requirements related to the consideration of historic features during the review of any development proposals and help shape management directions for the site. For example, adaptive reuse of the historic structures for park accessory uses, such as a comfort station or interpretive center, could be explored in an effort to support the expanded public use of the site, relay the story of the reservoir, and highlight the site's role in the growth and development of the City. Since the CEA designation would serve to highlight and preserve the unique historic and ecological features of the site, no significant adverse impacts on historic resources would be anticipated.

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Areas with wetland characteristics have been identified in the central and eastern basins, consistent with depictions on USFS National Wetland Inventory mapping. As indicated above, wetland areas were also found in the southern portion of the western basin by ecologists from Round Mountain Ecological LLC and NYC Parks Natural Resources Group (NRG). Field visits were performed by ecologists from NRG on May 15 and May 29, 2014 which confirmed that the previously identified wetland characteristics and native wetland species continue to persist in this portion of the western basin.

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The eastern basin consists primarily of native vegetation with a rim of invasive species. The central basin is open water surrounded by invasives, primarily Phragmites.

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Inaccessibility of Basin Interiors: There is currently no means to enter the basins other than scrambling down the basin walls, which severely hampers the ability of the City to monitor and maintain the site, perform invasive removal/restoration, or clear debris and garbage. This is particularly problematic, as the reservoir has been subject to unsanctioned human activities within the basins, including illegal dumping, paintball, and encampments. The establishment of controlled access points into the basin from the existing perimeter multi-use pathway above would allow for more effective management and stewardship of the unique developing vegetative communities within the basins and improved ability to address trespassing and related damage.



Corrections and Suggested Additions to Critical Environmental Area Application

Please note that the page numbers refer to the page numbers of the PDF.

Page 13

In recognition of its unique history, the Ridgewood reservoir has been nominated for inclusion on the National and State Registers of Historic Places.

Correction: The [Nomination for the Ridgewood Reservoir's](#) inclusion on the National and State Registers of Historic Places was submitted by the water education organization NYC H2O with support from the NYC Parks Department, neighborhood organizations and elected officials. In addition, it was determined to be eligible by the NY State Historic Preservation Office in an email from Preservation Analyst Jennifer Betsworth dated March 29, 2017. The paperwork required to complete the nomination is in process by NYC H2O.

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The Catskill Aqueduct was tied directly into the Ridgewood Reservoir in 1917 because the distribution network was already in place and the Reservoir remained in regular service until City Water Tunnel #2 was completed in 1936. It was not until the activation of the Delaware Water System in 1955 that the Reservoir became mostly obsolete.

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...The system collected water from Long Island streams, which was conveyed via the Ridgewood Aqueduct and pumped into the Reservoir by steam engines within the Ridgewood Pump Station located at the western terminus of the aqueduct.

CORRECTION: There were two pumping stations, one built in 1858 and another built in 1891. The text indicates one station rather than two. The first was situated on the north side of Atlantic Avenue off Logan Street and the second one was constructed on the south side of Atlantic Avenue, across from the older station. The second one was cleared in the 1940s for East New York Vocational High School. The older station was cleared about 1966.

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Areas with wetland characteristics have been identified in the central and eastern basins, consistent with depictions on USFS National Wetland Inventory mapping. As indicated above, wetland areas were also found in the southern portion of the western basin by ecologists from Round Mountain Ecological LLC and NYC Parks Natural Resources Group (NRG). Field visits were performed by ecologists from NRG on May 15 and May 29, 2014 which confirmed that the previously identified wetland characteristics and native wetland species continue to persist in this portion of the western basin.

...Wetland habitats and plant communities of special conservation concern were also found.

CORRECTION: The NWI Wetland Map on page 21 should be updated to reflect the wetlands in the western basin (Basin 3) as are acknowledged to exist in the paragraph above.

Questions: Since wetlands have been identified, why doesn't the Critical Environmental Area application accompany the wetland designation?

Will Parks ensure that all three basins are designated wetlands as indicated in the CEA application?

Page 15

The eastern basin consists primarily of native vegetation with a rim of invasive species. The central basin is open water surrounded by invasives, primarily Phragmites.

We submit the following satellite photos from 1995 and 2014 showing the phragmites "choking" the freshwater pond in basin 2 and ask that they be included in the report. Our hope that a plan to mitigate the Phragmites is enacted in short order.

Ridgewood Reservoir 1995, 2014

Encroachment of Phragmites ~50ft



1995



2014

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CORRECTION: The gatehouse is labelled as a "pumphouse." It should be labeled as a gatehouse.

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...wells, and the distribution system was enlarged, including the addition of the third basin in 1891.

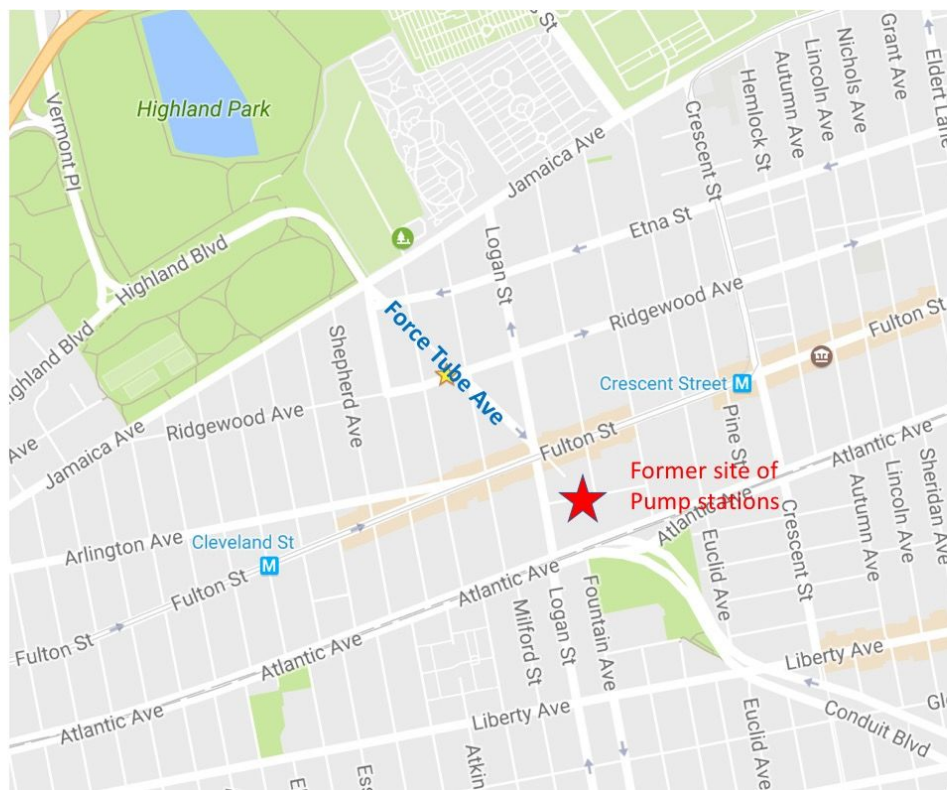
CORRECTION: A second pumping station was added in 1891 as well to pump the water to the third basin. The third basin was equal in volume (150 million gallons) to the first two basins combined (also 150 million gallons) and therefore necessitated a new pumping station.

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The original pump station has been removed, but historic structural elements remain, including the reservoir structure itself and a brick pump house and gate house along the northern edge of the west and central basins, providing a tangible physical connection to the Reservoir’s prior role as an important public works that was integral to the development and public health of the City.

Corrections:

1. There were two pumping stations located near Atlantic Ave & Logan Street where Force Tube Avenue begins. The approximate location of the pumping stations are marked with a star on the map below.



2. The two red buildings at the Reservoir are both gatehouses. One is referred to as a “pumphouse” in the application. This is not correct. The Gatehouse Study commissioned by the Parks Department from May 2017 confirms that it is a gatehouse. Also, from an engineering perspective, it is not necessary to pump water from the top of a hill.

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The Reservoir was the major source of water for the City of Brooklyn until 1898, at which time Brooklyn merged with the City of New York and gained access to the New York City water supply system. With the completion of the Catskill Aqueduct and City Tunnel No. 1 in 1917, a



high-quality water source from the Catskills became available and the Ridgewood System was placed on standby status.

CORRECTION: As noted above, the Catskill Aqueduct was tied directly into the Ridgewood Reservoir. The reservoir became less important with the completion of City Water Tunnel No. 2. With the introduction of the Delaware System water in 1955 the Ridgewood Reservoir became less important.

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The reservoir is a substantial open space between Ridgewood and East New York, two neighborhoods that are generally underserved by open space. As such, it is a special resource with significant educational and other programmatic opportunities to be developed by NYC Parks in coordination with the local community.

CORRECTIONS:

1. The neighborhood closest to the Reservoir to the south of it is Cypress Hills rather than East New York
2. NYC H2O currently has an active field trip program at the Reservoir and has brought over 2,000 students to the Reservoir since 2014. This spring alone we will bring 40 classes and

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Adaptive reuse of the historic structures for parks accessory uses, such as a comfort station, is another avenue that could be explored in an effort to support the expanded public use of the site, relay the story of the reservoir, and highlight the importance of the site's role in the growth and development of the City.

Correction: As a possibility for the adaptive reuse of the gatehouses please add an interpretive center (as is written on page 13 of the report) that highlights the ecological, cultural, historic and engineering treasures of the Reservoir. NYC H2O conducted a [survey about the reservoir](#) and [340 people responded](#). The majority of people would like to see the gatehouse(s) repurposed as an interpretive center.

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... Its bicycle and pedestrian pathway is used heavily and offers a critical connection along the Brooklyn-Queens Greenway, linking public parks, museums and other public facilities.

Addition: The water education organization NYC H2O brings over 2,000 students annually on field trips to the Reservoir to experience its unique ecological and cultural treasures.