



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

JUL 26 2016

Aaron Werner, AICP  
City of New York  
Department of Housing Preservation & Development  
Office of Development – Building and Land Development Services  
100 Gold Street, Rm 7-A4  
New York, NY 10038

Dear Mr. Werner:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the Lambert Houses Redevelopment Project (CEQ# 20160138). The Department of Housing Preservation & Development of the City of New York prepared this document as the responsible entity consistent with the U.S. Department of Housing and Urban Development (HUD) delegation authorities.

The proposed project involves the demolition of the Lambert Houses buildings in the West Farms area of the Bronx, New York and redevelopment of the property with a combination of affordable housing, retail, and a possible school. The project would require approval by HUD for the reassignment of project-based rental assistance, and may also request HOME funds or other funding from HUD. The project intends to improve the quality of life for current Lambert Houses residents while increasing the number of affordable housing units on the Development Site. The site is currently underdeveloped, with less floor area than the current zoning districts allow and less density than the surrounding neighborhood. Current retail space is poorly designed with little to no street frontage and inadequate storage for merchants. The proposed project would increase the available housing by 934 units, would increase the available retail space to 61,000 square feet (sf), and would provide 86,608 sf of space for a possible new 500-seat elementary school. There would be a reduction of 110 parking spaces as a result of the project, as well as a decrease in open space from .10 acre to .04 acre on Parcel 10 as a result of the project.

Given that the project would require approval by HUD, and may also apply for HUD funding, a general conformity applicability analysis is required. The analysis would focus on the direct emissions (i.e., construction) and would not include indirect emissions associated with the project. Additionally, regarding the air quality analysis that was conducted in Chapter 13, page 13-6, please note that on April 6, 2016, EPA did reclassify the NYC ozone nonattainment area to moderate. Regardless, EPA strongly encourages the use of techniques to reduce construction emissions, especially given the residential nature and density of the area and project duration. Following are just a few measures to be considered:

- Solicit bids that include use of energy and fuel-efficient fleets;
- Solicit preference construction bids that use Best Available Control Technology (BACT), particularly those seeking to deploy zero-emission technologies;
- Employ the use of alternative fueled vehicles;
- Utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators.

The DEIS notes that the project will result in a decrease of open space on Parcel 10 from .10 acres to .04 acres. To help offset the impact of this loss, the project will provide approximately 12,655 square feet of open rooftop space for residents on one of the buildings on Parcel 10. Given the increasing demand for open space that will result from the addition of over 900 new residential units, and that the residential study area has a total open space ratio of 0.571 acres per 1,000 residents (which is lower than the city's goal of 2.500 total acres of open space per 1,000 residents and below the citywide community district median of 1.5000 acres per 1,000 residents), EPA recommends that all of the new rooftops be made accessible to residents as open space, not just one building on Parcel 10. Further, to enhance the sustainability of the project and reduce impervious cover, green roof techniques should be integrated wherever feasible. Green roofs reduce stormwater runoff, enhance open spaces, and help reduce heat island effects in warmer months.

The DEIS states that the new building will meet Enterprise Green Communities criteria, which mandate energy efficiency and water conservation. EPA acknowledges this commitment and encourages that all aspects of the new construction be designed in the most sustainable way possible. We have also attached our Green Recommendation guidelines as a reference for ways that this and future projects can be enhanced to reduce their environmental footprint and increase sustainability.

Commonly, the focus on health and the environment is contaminant-based, assessing how exposure to a contaminant could result in a negative health outcome for a specified population. This approach can be seen on page 16-1; which states, "...the proposed project would not result in unmitigated significant adverse impacts in any of the technical areas related to public health (hazardous materials, water quality, air quality, or noise)...therefore, the proposed project would not have the potential for significant adverse impacts related to public health and no further analysis is warranted." However, this way of looking at health and health disparities does not recognize the many factors in people's lives that directly and indirectly affect their health, known as health determinants. Health determinants are the range of personal, social, economic, and environmental factors that affect people's health status.<sup>1</sup> Health Impact Assessment (HIA) and/or elements of HIA use(s) scientific data, health expertise, and public input to factor evidence-based public health considerations into the decision-making process. The National Research Council defines HIA as a "systematic process that uses an array of data sources and analytic methods and considers input from stakeholders to determine the potential effects of a proposed policy, plan, program, or project on the health of a population and the distribution of those effects within the

---

<sup>1</sup> Human Impact Partners. 2011. A Health Impact Assessment Toolkit: A Handbook to Conducting HIA, 3<sup>rd</sup> edition. Oakland, CA: Human Impact Partners.

population. HIA also provides recommendations on monitoring and managing those effects.”<sup>2</sup> Given the size and 13-year anticipated build out period of the proposed project, the health of the residents will be affected both directly and indirectly. While the long term outcome is expected to be beneficial, there may be adverse impacts during the construction phase, and even afterwards as the number of residences is increased, and open space decreases. These various factors should be considered and discussed with residents in advance in order to avoid, minimize or mitigate the impacts to the extent possible. EPA highly recommends that some level of HIA be incorporated into your NEPA process and documented in the final EIS. Please contact us if you would like additional information on the topic.

Demolition of the existing structures will occur over a span of 13 years and will comprise a significant portion of the project. The draft EIS did not provide significant details regarding final disposition of construction and demolition (C&D) material for the project. Recycling and/or reuse of C&D material can lessen the impacts of increasing disposal at solid waste facilities. The final EIS should evaluate recycling, reuse and disposal options for C&D waste associated with demolition. You may find more detailed information about recycling of C&D waste at: <https://www.epa.gov/smm/sustainable-management-construction-and-demolition-materials>. Additionally, our Green Recommendation guidelines referenced earlier includes resources to help increase the sustainability of the project.

Given the local impacts of recent storm events, including super storm Sandy, EPA recommends including a discussion of how climate change may alter flood risk over time. EPA also recommends that the FEIS discuss how future climate scenarios may impact the proposal. The Final EIS's alternatives analysis should, as appropriate, consider practicable changes to the proposal and building designs to make the project more resilient to anticipated climate change. Changing climate conditions can affect a proposed project, as well as the project's ability to meet the purpose and need presented in the EIS. In some cases, adaptation measures could avoid the potentially significant environmental impacts of failure to adequately address the threat of a changing climate on the proposal.

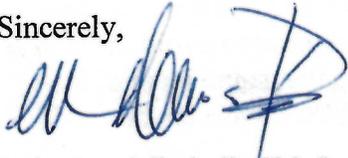
Thank you for the opportunity to comment on the DEIS for the Lambert Houses Redevelopment Project. EPA rates the DEIS as LO or "Lack of Objection" in accordance with EPA's national rating system. However, our comments on the DEIS contained in this letter are intended to help provide useful information that will ultimately inform local, state and federal decision-making

---

<sup>2</sup> National Research Council. 2011. Improving Health in the United States: The Role of Health Impact Assessment. Washington, DC: The National Academies Press.

and review, and reduce project impacts further. Should you have any questions regarding the comments and concerns detailed in this letter, please feel free to contact Stephanie Lamster of my staff at 212-637-3465 or lamster.stephanie@epa.gov.

Sincerely,



Judy-Ann Mitchell, Chief  
Sustainability and Multimedia Programs Branch

for

Enclosure