

JEROME PARK RESERVOIR, June 19, 2008
Blasting Above Ground vs. Raised Bore Drilling From Below
Violating the EIS here and elsewhere: what can we do?

The Final Supplemental Environmental Impact Statement (FSEIS) of June 2004 stated that there will be no blasting at Jerome Park Reservoir for related construction activities for the Croton Water Treatment Plant. The proposed work includes the excavation and construction of shafts, a valve chamber and meter chambers. The DEP originally proposed the Raised Bore Drilling as the preferred method, and did not study blasting. Therefore, blasting creates an impact not studied in the 2004 FSEIS -- truck traffic and congestion in addition to noise and air impacts. It will also increase the noise impact that was heretofore mitigated¹

The DEP presentation at the June 19, 2008 CFMC argued that the blasting for the shafts and vaults at the Jerome Park Reservoir would quicken the work and reduce the overall period of duration. This is different from the ongoing blasting that is occurring for the tunnels from the filtration plant to the reservoir, where all the debris is carted off through the Mosholu site. So far they have completed most of the underground blasting without much notice from the community and/or the public at large. But most of that blasting has been underground and in the tunnels. The proposal to blast at the shafts and vaults is quite different.

The assertion that blasting would minimize impacts by reducing the duration of the noisy activities is unfounded. The EIS analysis cited below shows that even with the use of the raised bore drilling there is an impact that needs to be mitigated; this new blasting proposal will certainly exacerbate that original noise impact. The impact of blasting above ground at Jerome Park Reservoir and the mitigation needed is not described in the EIS. At Mosholu, when that blasting was done a expensive concrete noise attenuating wall along Jerome Avenue was built.

Moreover, it will create a *new impact* not analyzed in the EIS. During daily activity, traffic congestion slows to a crawl. As various construction sites commence work around JPR, this will increase. The EIS states work hours at these JPR sites are from 7 am to 6 pm for approximately 21 workers and at the peak, *5 construction vehicles per day*. The Jerome Park Reservoir May 2006 EAS projected 3,000 cubic yards of rubble for the Demo Plant and Gate House 5 and 7, and another 3,000 cu yd of fill for a total of 600 truck trips.² Blasting adds to this number.

While the new plan focuses on the accelerated schedule, the real question is how those 9,000 cubic yards of debris will be removed. A typical dump truck operating on city streets might carry 20 cubic yards -- that's 450 trucks! If they use the smaller ten-yard trucks then they

1 The following links will bring you to the Sections that were presented in the 2004 FSEIS. Methods for the noise analysis can be located here: <http://www.nyc.gov/html/dep/pdf/croton/4-10noise.pdf>.

The actual noise impact analysis conducted for JPR and the surrounding area can be found on page 176 within this section: <http://www.nyc.gov/html/dep/pdf/croton/8-02jeromepark.pdf>

The mitigation plan, which suggests portable noise attenuating barriers, can be found on page 11 of this section: <http://www.nyc.gov/html/dep/pdf/croton/9-04offsite.pdf>

The Response to Comments is on page 66-70: <http://www.nyc.gov/html/dep/pdf/croton/dseiscomments.pdf>

are inducing 900 truck trips. For a 16-week session, we can assume that 10 of the 16 weeks are used for excavating -- that's could be 45-90 trucks a week on average. This increased of truck traffic is enough to warrant a review for a new and as of yet unstudied noise and traffic impacts. How are they going to control dust from loading these trucks, will they be idling, are they going to set up a scale? And how are they going to organize the traffic flow and mitigate its affects to the community. Also, what is the affect on parking on Goulden Avenue?

On the other hand, for years members of the community has asked that the DEP reconsider its process train for the CWTP – to add *Membrane Filtration*. Today, unlike five years ago, Membrane Filtration is considered state of the art. Since this is suggesting opening up avenues not previously explored in the 2004 FSEIS, let's be fair and make another change. Review Membrane Filtration which is proven to be a better, cheaper and smaller process train than the one chosen in 2004. Add the comparison of Membrane Filtration to the study of Blasting for the Shaft and Valves at JPR to the scope of the new EIS.

Finally, it seems that the valve chamber may be bigger than what is described in the SDEIS³. It appears that everything is now in one large concrete “box” below grade in Harris Park. Whether or not consolidating the facilities is a good idea is not the issue. The issue concerns public access to the area above the valve chamber, and whether or not parkland will have to be alienated. This could trigger multiple processes that would have to be completed before work can begin. Won't this further delay the project and add to the already growing costs? How will all of this affect public access to JPR and the lands and parkland surrounding it? It is time to publicly propose and discuss a *community MOU governing the rules for public access to the Jerome Park Reservoir*. Let us all comment on it.

Karen Argenti

³ The SDEIS described separate and small facilities around JPR, including the Harris Park Annex and on the street for each of several valve chambers and meter chambers. This can be found on pages 8-13 on <http://www.nyc.gov/html/dep/pdf/croton/8-02jeromepark.pdf>.