

**Decision Memorandum and Environmental Review to Support Emergency Activities  
for Temporary Housing of Migrants**  
U. S. Department of the Interior National Park Service  
Gateway National Recreation Area

## **Introduction**

The National Park Service (NPS) is requesting alternative arrangements for National Environmental Policy Act (NEPA) compliance pursuant to 43 CFR 46.150(c) (emergency responses).<sup>1</sup> As described below, there is an urgent need to respond to a humanitarian crisis caused by tens of thousands of migrants entering New York City (City) and exceeding the City's capacity for temporary shelter. The Council on Environmental Quality (CEQ) has concurred that there is an emergency situation that can appropriately be addressed through the DOI NEPA emergency procedures at 43 CFR 46.150.

The NPS is proposing to enter into one or more agreements, leases, and other administrative arrangements in accordance with its authorities to allow the City to use NPS lands for the purposes of temporarily operating a migrant camp on Floyd Bennett Field (FBF) within Gateway National Recreation Area (GATE or park). The impacts of allowing such use are not expected to be significant, and therefore an environmental assessment would be the appropriate NEPA compliance pathway for this action. However, there is not time to complete an EA before action must be taken to address imminent threats to human health and safety. Consistent with guidance from the Council on Environmental Quality (Emergencies and the National Environmental Policy Act Guidance 2020), the information contained herein, and the efforts to be taken regarding the emergency action, the NPS proposes to comply with the regulatory requirements for EA content, interagency coordination, and public involvement to the extent practicable.

## **Background**

New York City has seen an influx of approximately 100,000 migrants in the past year and is currently housing more than 58,000 migrants in City shelters. The City has utilized areas such as soccer fields, recreation centers, and parking lots to house migrants, but lacks additional space and resources to meet current needs. The influx of migrants has led to overcrowding in existing facilities, instances of migrants being forced to sleep on sidewalks and other public areas, and in some cases unsanitary conditions. Taken together, the situation has resulted in threats to health and safety of migrants and others. The State of New York has declared a Disaster Emergency as a result of the large number of migrants, stating, "federal support is critical to support the City of New York and other local governments within the State that lack the infrastructure, facilities, and resources necessary to meet the immediate humanitarian demand to house and meet other basic needs of the large numbers of migrant arrivals related to the large influx of migrants" (see New York State Executive Order 28).

## **Purpose and Need**

The purposes of taking action are: 1) to allow New York City to operate a temporary shelter to provide housing and other services for a limited number of migrants; and 2) to make certain improvements to Floyd Bennett Field that ensure its preservation, repair and rehabilitation and will contribute to its long-term visitor use and enjoyment.

Action is needed to alleviate risks related to health and safety of migrants and others and to assist the City in meeting migrant needs. GATE has historic resources available for lease that can assist the City in meeting those needs, as well as its own need to make certain improvements to the historic property at Floyd Bennett Field.

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<sup>1</sup>"If the Responsible Official finds that the nature and scope of the subsequent actions related to the emergency require taking such proposed actions prior to completing an environmental assessment and a finding of no significant impact, the Responsible Official shall consult with the Office of Environmental Policy and Compliance about alternative arrangements for NEPA compliance. The Assistant Secretary, Policy Management and Budget or his/her designee may grant an alternative arrangement. Any alternative arrangement must be documented. Consultation with the Department must be coordinated through the appropriate bureau headquarters."

## Proposed Action

The 1,450-acre Floyd Bennett Field Historic District is the largest single publicly owned, managed, and accessible under-developed parcel of land in New York City (National Register Form 2010). Floyd Bennett Field opened in 1931 as the site of New York City's first municipal airport. In 1942, it was transferred to the Navy and became Naval Air Station – Brooklyn. The Navy decommissioned the airfield in 1971, and in 1972, most of the land was transferred to the National Park Service as a unit in Gateway National Recreation Area. The site was originally one of many marsh islands in Jamaica Bay. Extensive fill was placed on the site from the 1920s through 1940s to create the largely anthropogenic landform that exists today. The site was most densely developed during the World War II era. Many of the buildings and structures at the site today are unoccupied and in varying degrees of disrepair or ruin. It is an expansive landscape characterized by open fields, extensive areas of concrete and asphalt pavement, young second-growth thickets and woods, engineered and natural shorelines, and a variety of buildings clustered into what were historically flight-path clear zones.

The NPS will enter into a lease agreement with the City for a period of one year with an initial period of ninety days. The lease agreement will allow the City to take actions necessary to provide occupation and use of the areas specified in Figure 1 for the purpose of housing up to 2,000 migrants.



Figure 1. Floyd Bennett Field, Gateway National Recreation Area, Brooklyn, NY identifying runway 19, a portion of the Hanger B / Sea-Plane Parking Lot, and two (2) Campground areas.

The lease agreement will also include requirements for site improvements of certain areas within FBF as public benefits (see Figure 2). Some of the site improvements will be completed at the end of, or after, the up to 12-month emergency action period. For the purposes of this document, “emergency action” refers to actions related to controlling the immediate impacts of the emergency, which are fully covered by these NEPA emergency alternative arrangements. This generally includes construction, improvements to existing infrastructure, and placing new temporary infrastructure to allow occupancy of the site; operation and administration of the site; and associated actions related to health and safety of individuals within the project area. Planned future improvements (follow-on actions) are actions that will provide public benefits and that will not be immediately implemented. Although follow-on actions are included in this document, related impacts are assessed at a “programmatic” level. The NPS has time to complete site-specific NEPA compliance for follow-on actions and will do so as necessary before implementing any follow-on actions.

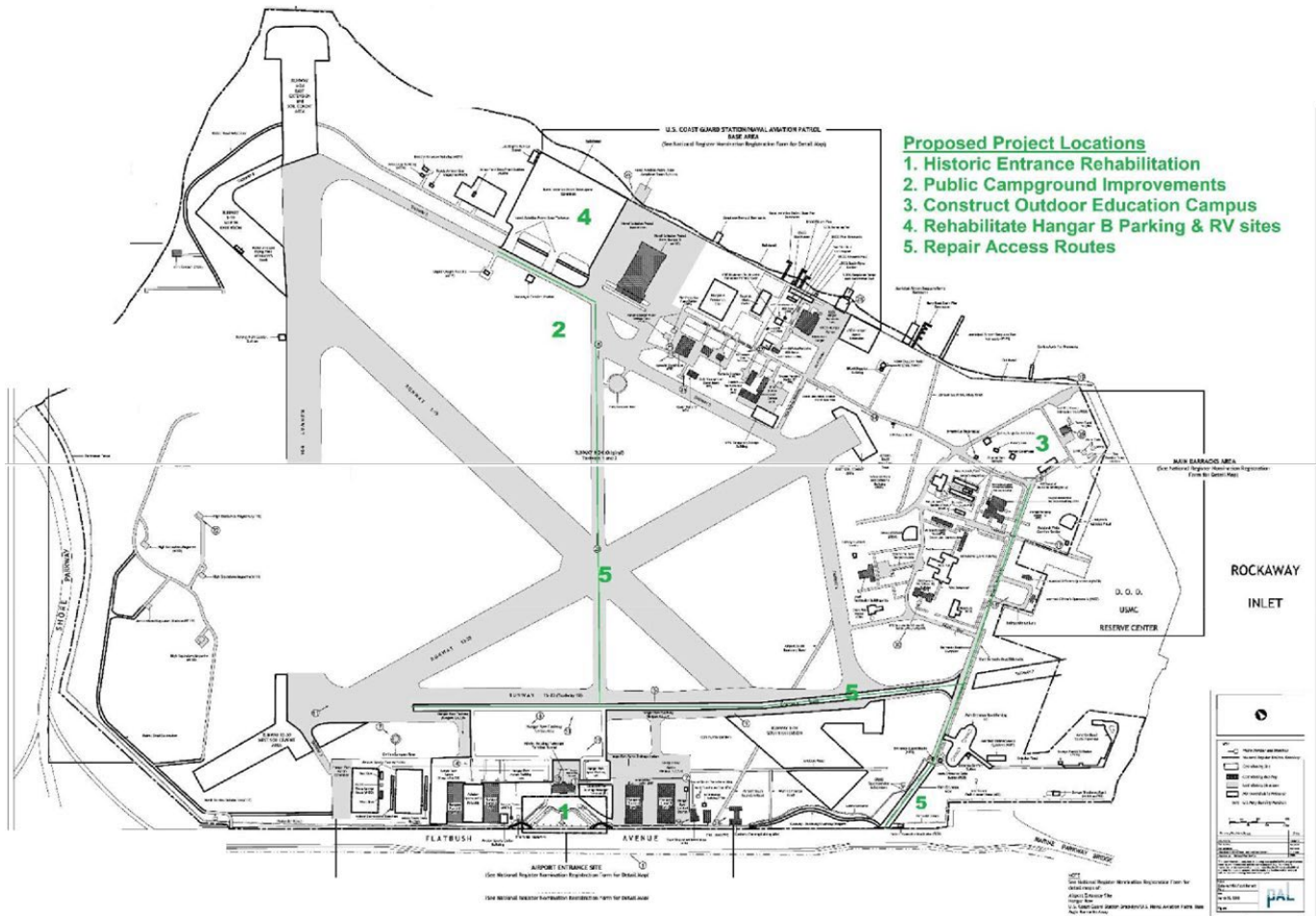


Figure 2. Location of emergency actions required to provide safe access for and administration of the migrant housing (projects 1, 4, 5 and some elements of project 2) and follow-on actions (projects 2 and 3) at Floyd Bennett Field, Gateway National Recreation Area, Brooklyn, NY.

Throughout the duration of the proposed action, the NPS will provide oversight of operations on FBF concerning the temporary housing of migrants. The NPS Director (or designee) will retain command oversight of the park’s facilities and operations, balancing the City’s requirements against impacts to the park’s mission. All modifications to real property will require pre-approval from the NPS and will be submitted to the GATE superintendent for approval. The City and its agents will be held accountable for the protection of park resources to include natural and cultural resources identified in various NPS management plans.

Temporary facilities will be constructed to support a maximum initial occupancy of 2,000 residents plus additional support personnel to provide shelter, food services, restrooms, showers, clothing, medical, security, laundry, and associated needs. Migrants will be housed in tent-based structures. All facilities will be constructed in a temporary and removable fashion. Facilities will be designed in a resilient manner or will be able to be quickly demobilized in

anticipation of major weather events. Based upon facilities constructed at other locations, NPS anticipates that 4-8 winterized tents similar in size to the airplane hangars at FBF will be installed to support the 2,000 residents. Facilities will be arranged and anchored in a manner that minimizes impacts to natural and cultural resources. To the greatest extent possible, tents will be secured using sandbags, water ballast or similar materials. Staking will be minimized and will avoid areas with sensitive resources. Throughout the duration of the proposed action, the City will be responsible for providing and managing utilities (including water, wastewater, and power), security, food, clothing, medical, security, custodial services, solid and hazardous waste, and grounds maintenance, as necessary. Medical staff will be under the direction of the designated Lessee's Chief Medical Officer or medical coordinator. The City may station an emergency medical service unit at the site as required. The disposal of all medical waste will be coordinated with appropriate NPS representatives and will meet all applicable regulatory requirements.

The City will provide 24-hour law enforcement (security services) scaled appropriately to accommodate the number of migrants and the size and complexity of the camp. The New York Police Department will be the primary entity responsible for law enforcement issues involving migrants. The City will provide enhanced 24-hour law enforcement and security at locations identified by the NPS Director sufficient to protect park visitors and park resources. During park closure hours this will include staffing the security gate at the entrance to FBF. The NPS will identify sites within the proximity of the project area that pose an elevated safety risk with a high density of people residing in the park 24-7, including unoccupied and deteriorating buildings as well as contaminated sites. The City will be required to mitigate those risks through fencing, security cameras, and other security measures. To the greatest extent possible, fencing will be secured using sandbags, water ballast or similar materials. Any ground disturbance related to fencing will be temporary in nature and will avoid areas with sensitive resources. Temporary lighting will be installed in locations throughout the area in order to ensure safety and deter crime. To the greatest extent possible, new lighting will be Night Sky compliant. In some locations, such as near the visitor center and other structures, lighting will remain on at all times after sundown.

The City will make arrangements for all required utilities, including gas, electricity, other power, water, cable, telephone, sewage, waste removal, and other communication services. The City will manage all water and wastewater facilities in a containerized manner as the City will not be permitted to connect to NPS utilities, which are not sized to accommodate additional capacity. The City will provide electrical services which may include on-site generators or other temporary installations. The City will manage all fuel in a containerized manner as the City will not be permitted to utilize NPS fuel services, which also are not sized to accommodate additional capacity. All fuel facilities will have secondary containment. In the event the City generates, processes, disposes of, or handles any hazardous substances and hazardous materials, the City will ensure removal, remediation, or other corrective action mandated by either the State or Federal regulatory authority and adhere to all relevant regulatory requirements related to hazardous substances and hazardous materials. The City is not authorized to operate the site for storage of hazardous materials.

The City will improve traffic circulation, parking, and access to the site by reestablishing the historic entrance to the FBF at the Ryan Visitor Center, improving the Hangar B/Sea-Plane Ramp Parking Lot, and performing repairs on approximately 12,000 linear feet of main access routes throughout the project area. As identified in the 2006 Jamaica Bay Transportation Studies and 2014 General Management Plan (GMP), the original entrance to the municipal airport from Flatbush Avenue will be re-opened at the Ryan Visitor Center. Re-opening the diagonal entrance drives requires a circulation plan, striping, security mechanisms for the gates, gate repair, hardscape repair or repaving of the surface, minor curb modifications, and landscaping. The park coordinated with The New York City Department of Transportation (NYCDOT) on their design and reconfiguration of Flatbush Avenue to accommodate this use. NYCDOT has already altered the pavement markings and signage on Flatbush Avenue to allow for reopening of the Ryan Visitor Center entrance drives. Re-opening of the diagonal entrance drives is identified in the Cultural Landscape Report for Floyd Bennett Field (Cody and Auwaerter 2009) as the most historically appropriate location for new entrances from Flatbush Avenue into the Historic District.

At the Hangar B/Sea-Plane Ramp Parking Lot, work will include removing a large debris pile adjacent to the site, removing invasive trees and vegetation, planting native species, replacing fencing, jack mudding sunken slab sections, and concrete patching. Consistent with the 2014 GMP, the twelve adjacent RV camping sites will be upgraded to include electrical hookups and striping. The parking lot area is a non-contributing structure within the Historic District.

Throughout FBF, approximately 12,000 linear feet of main access routes will be improved to facilitate traffic for equipment delivery, administration, and migrant housing. Immediate improvements will be needed to correct drainage

issues where water is ponding on Runway Road 15-33, parallel to Flatbush Avenue. Existing asphalt roadway will be milled and top coated. Existing concrete areas will be mud jacked and patched as necessary. The City will be responsible for not only addressing any impacts that result from their use but for general improvements to these access routes for the benefit of the public.

The NPS and the City will develop a full site plan for how the project area relates to other public areas and operations of FBF. The NPS may limit migrant, City personnel, and/or contractor access to some park areas and/or amenities as necessary to provide visitor safety and/or to protect park resources. Movement of City personnel, contractors, and visitors to the mission site will be restricted to direct movement between the main entrance to FBF (from Flatbush Avenue just north of the Marine Parkway Bridge) to the project area and return when exiting GATE. Any movement outside this direct travel route must be coordinated with the NPS. During hours the park is open, migrants will be permitted to use the park following the same rules as other visitors. During closure hours, migrants will not be permitted in areas of the park that are not part of the project area.

When use of the project area ends, the City will remove all temporary facilities, alterations and additions related to the operation and administration of temporary migrant housing and restore the area at a minimum, to as good of a condition that existed prior to the commencement of the emergency action. Alterations, betterments, additions and improvements that are made to reestablish the historic entrance to the FBF at the Ryan Visitor Center, to improve safety and use of the Hangar B/Sea-Plane Ramp Parking Lot, and to improve approximately 12,000 linear feet of main access routes will remain after the use of the project area ends. Additional compliance may be required for other improvements or requirements specified in the proposed by the City throughout the period of the lease. Any changes to the proposed action will be subject to NEPA compliance, as appropriate. Compliance for planned future improvements is addressed in the "Follow-on Actions" section of this memorandum.

## **Mitigation Measures**

Pursuant to the terms of the lease, the City will be responsible for developing a number of plans to address and incorporate the specific issues and mitigation measures listed below, as applicable. The lease agreement contains additional mitigation measures and plan requirements that, although not specifically listed below, are incorporated by reference into this memorandum.

1. All City personnel and contractor employees must utilize routes specifically designated by NPS. The City, in coordination with NPS Director, will develop a transportation plan to include ingress and egress to the project area, parking, pick-up and drop-off locations, and operational schedules.
2. Visitor access to the project area will be limited. A formal request for visitation to the project area will be made to and approved by NPS based on a City-provided "need to access assessment" after coordination with all appropriate NPS entities. All visitors to the project area will be escorted by a City representative. This includes, but is not limited to, Congressional staff, media, and non-governmental organizations.
3. NPS will limit migrant, City personnel, and/or contractor access to some park areas and/or amenities as necessary to provide visitor safety and/or to protect park resources.
4. The City will comply with all requirements derived from completion of federally required consultations and compliance, including National Historic Preservation Act Section 106, Endangered Species Act Section 7, Coastal Zone Management Act, and Floodplain Statement of Findings.
5. All vertical structures/facilities built or installed on NPS property will comply with applicable building code requirements to include wind loads.
6. The City will develop a trash and recycling plan. This will include actions to minimize single use plastics to protect park resources. Best management practices will be employed to manage and secure trash at all times.
7. The City will develop a food services plan to include food distribution, food storage, food security, cooking facilities, cold storage, etc. The City will be responsible for ensuring food is managed in a centralized facility and will be responsible for ensuring all food handling meets federal standards.
8. The City will develop a pest management plan for review and approval of the NPS Director prior to occupancy. The plan will conform to NPS laws, regulations, and policies for integrated pest management, and any chemicals

used must be approved by NPS.

9. The City will develop a detailed storm management plan for review and approval of the NPS Director. This plan will identify how the City will address how temporary facilities and other property will be removed from the project area within 48 hours of an evacuation notice.
10. The City will develop a detailed emergency evacuation plan for review and approval of the NPS Director. The plan will describe how the site will be evacuated in the event an emergency evacuation order is issued.
11. The City will develop a stormwater pollution protection plan to include erosion control associated with all construction and any potential overflow into Jamaica Bay related to the proposed action. Best management practices will be employed to prevent migration of construction materials, debris, and sediment from entering the waterways. Seed-free straw bales must be deployed for sediment/erosion control.
12. The City will develop an air quality management plan for review and approval of the NPS Director. The City will submit to the NPS all air quality monitoring reports that may be required by regulatory agencies in conjunction with activities associated with the Premises, such as the use of generators. Any generators utilized on the Premises must be Environmental Protection Agency (EPA) Tier IV (Tier 4) compliant and must be permitted by the appropriate regulatory agencies.
13. The City will monitor noise levels associated with generator operations to ensure that the noise levels identified in the GATE Superintendent's Compendium of 60 decibels, at 50 feet from the source, are not exceeded.
14. The City will develop a lighting management plan. The City will ensure sufficient lighting to deter crime both on the Premises and at secondary locations the NPS deems to be appropriate to protect resources. While safety will remain the first priority for the lighting plan, the City will make every effort to comply with NPS Management Policies 2006 (Section 4.10) best practices on lightscape management in national parks.
15. The City will develop a Spill Prevention, Control and Countermeasures Plan. The City will immediately notify the NPS and other applicable regulatory entities of any unauthorized releases or the deployment of any countermeasures.
16. All machinery containing fuels and oils shall have a spill kit available immediately in the event of a spill. In the event of a fuel or oil leak/spill, the work shall cease immediately, spill containment deployed, and NPS Dispatch (phone: 718-354-4700) and other jurisdictional authorities called immediately, as designated.
17. Excess drilling fluids, slurry, and spoils must be contained until disposed of in compliance with local ordinances, regulations, and environmentally sound practices in an approved disposal site.
18. Unless otherwise specified by the NPS, all removed material is to be disposed of outside the park at an approved landfill, recycled, or disposed of at other locations in accordance with federal, state, and local regulations.
19. All areas of soil disturbance resulting from the permitted activity must be stabilized immediately following project completion.
20. Intact native topsoil from the project area shall be retained whenever feasible. Should additional fill be needed, all fill must be of quality suitable for use in a National Park Unit. The City will submit material certificates for imported backfill and fill materials before delivery to document park approval of source and quality in accordance with applicable standards.
21. Any new soils/sediment brought on site must be tested and meet New York State Department of Environmental Conservation standards for general fill (6 CRR-NY 360.13). Any fill materials required for the project must be obtained from a park-approved source. Soils should not be amended.
22. The City will provide documentation that all imported soils and materials (such as straw bales, mulch, seed mixes, plantings) are clean of contaminants and free of exotic seeds and spores.
23. The City will submit certificate(s) of inspection for species and areas subject to quarantine rules (such as but not limited to 1 CRR-NY III C 142) to demonstrate compliance with applicable Federal, state, and local laws, requirements, and NPS policies.
24. Except for the project work described in this document and the lease agreement, the City may not cut any timber or

remove any other landscape features such as shrubs or bushes without prior written approval from the NPS. .

25. Site use controls (e.g., temporary fencing) and improved signage will be used to direct visitor use to authorized areas and authorized trails to limit impacts on vegetation and wildlife.
26. Any wheel ruts, holes or divots in lawn areas caused by the work will be repaired. Any bare soil areas created by the work will be seeded with annual ryegrass and a native grass seed mix designed for the Northeast US region, where needed to restore the area to pre-construction condition. Seed will be applied at a rate of ½ pound per 1,000 square feet *unless otherwise required for compliance with applicable standards*. The park's Resource Stewardship Division must approve all plant selections before they are purchased.
27. The City will use native plant species that are as closely related genetically and ecologically as possible to park populations. For GATE, the operational definition for closely related native species is plant material from seeds or cuttings that were collected from native plant species within 10 miles of the ocean anywhere along the coasts of New Jersey, Staten Island, and western Long Island. Substitution of plant material will be made only based on proof of unavailability. The NPS must approve all plant selections before they are purchased.
28. Care will be taken not to disturb any wildlife species (reptiles, migratory birds, raptors, or bats) found nesting, hibernating, estivating, or otherwise living in, or immediately nearby, worksites.
29. If exterior project work will be implemented during period of April 1 to September 1, NPS must be notified in advance and the City may be required to have a qualified biologist conduct an inspection of the work area prior to initiating work to determine if there is any nesting activity that could be impacted by the project. If nest building begins, birds must not be harassed in any manner to deter nesting activity. Park approval is required prior to placement of any structures to deter nesting.
30. Any park infrastructure impacted during construction, including but not limited to paved and unpaved roadways, walkways, turf, will be restored to pre-construction conditions upon completion of the project.
31. Best management practices for communication tower design, sighting, construction, operation, maintenance, and decommissioning will comply with United States Fish and Wildlife Service 2016 guidelines (see <https://us-fcc.app.box.com/s/sc1742pnyc7w14vzzhcz3hrkof1qn3l>).

## **Existing Condition of Resources and Potential Environmental Impacts**

In addition to the resources discussed below, the NPS used CEQ's Climate and Economic Justice Screening Tool to determine whether there are any disadvantaged communities that would be disproportionately affected by the proposed action. While some disadvantaged communities exist outside of the project area and outside of GATE, no disadvantaged communities would be disproportionately affected by the proposed action due to their distance from the project area.

The following discussion of impacts presumes application of the mitigation measures included above, as applicable.

### Air Quality

Floyd Bennett Field is in Kings County, New York, which is part of the New-Jersey-New York-Connecticut Interstate Air Quality Control Region (40 CFR § 81.13). The air basin is a shared resource and impacts on it come from regional sources. Current air quality conditions at FBF are poor for several indicators, including all three indicators evaluated by the NPS: ozone, wet deposition, and visibility. Kings County is designated by USEPA as serious nonattainment for the 2008 8-hour ozone (O<sub>3</sub>) National Ambient Air Quality Standard (NAAQS) and as moderate nonattainment for the 2015 8-hour O<sub>3</sub> NAAQS. Kings County is also designated as maintenance for carbon monoxide (CO) and particulate matter less than or equal to 2.5 microns in diameter (PM<sub>2.5</sub>) and unclassified/attainment for all other criteria pollutants (USEPA 2020).

Temporary operation of heavy equipment; workers commuting to and from the project area in personal vehicles; heavy duty diesel vehicles hauling materials, water, wastewater, and debris to and from the project area; operation of generators to power the temporary facilities; and the potential for bus services for migrants to travel to and from the project area would contribute to air quality impacts. Particulate matter air emission would be produced by the

combustion of fuels. Particulate matter emissions from fugitive dust would be minimized through minimal ground disturbance and use of hardscapes. Portable facilities and other sustainable design techniques would minimize the need for permanent construction and its related air quality impacts.

In its GMP, the park evaluated the impacts of creating a wetlands center at FBF. This included the use of heavy equipment for excavating, grading, and construction. The GMP concluded that the very intense construction related to the wetlands center, requiring 30 to 50 trips by heavy-duty trucks each day for a 6-month period would contribute between 0.25 and 0.5 ton of hydrocarbons, 1.3 and 2.3 tons of carbon monoxide, and 6 and 10 tons of nitrogen oxides. The GMP concluded that those levels of emissions would be small in the context of overall air quality at FBF. The air quality impacts expected from construction related to the wetlands center are far greater than the impacts that would occur from the temporary construction and operation activities under the proposed action.

Generators used under the proposed action would be permitted by appropriate regulatory agencies and would meet EPA Tier 4 emissions standards in order to minimize impacts to air quality. The City will be required to develop an Air Quality Management Plan and submit air quality monitoring reports, as appropriate, to the NPS.

The park would potentially diminish its contribution to greenhouse gases by restoring native vegetation as part of emergency and follow-on actions, including removal of non-native vegetation and planting of appropriate native vegetation (Figure 2 projects 2, 3 and 4), thereby offsetting the cumulative degradation of air quality from regional sources. Overall, air quality impacts would be minimal, temporary, and localized.

### Cultural Resources

Floyd Bennett Field Historic District was listed on the National Register of Historic Places in 1980 with 15 contributing resources and a period of significance from 1928 to 1931. In 2010, the district was expanded to include 94 contributing resources and a period of significance from 1928 to 1945. It is significant under Criterion A at the national level in the area of Transportation for its role in early aviation history. It is also significant at the national level under Criterion C in the areas of Architecture and Engineering for its collection of buildings and structures embodying the characteristics of both early-twentieth-century civil aviation facility design and World War II-era military construction. Today the site consists of Art Deco hangars, paved runways and taxiways, and the Ryan Center, a 42,000-square foot Georgian Revival administration building with an attached control tower. FBF also contains numerous structures from the WWII era such as barracks, utility buildings, warehouses, and maintenance facilities. The civil and military aviation history resources at FBF as well as pre-contact and historic archeological sites are identified as important park resources and values in the 2014 GMP.

The Historic District is a largely anthropogenic landform that was transformed during the 1920s and 1930s through extensive grading and landfilling to develop New York's first municipal airport. In 1941, FBF was transferred to the Navy and became the Naval Air Station – Brooklyn. In the early 1940s, the Navy expanded the airfield from 387 acres to more than 1,200 acres. Over 100 new buildings and structures were constructed including runways, taxiways, new hangars, offices, workshops, storage and maintenance facilities, barracks, mess halls, and other support structures. It was the busiest Naval Air Station in America during World War II and was in use until 1967. The Navy decommissioned the airfield in 1971, and in 1972, most of the land was transferred to the NPS as a unit in GATE.

Runway 6-24 (New) (built 1942, LCS #041264, NYSHPO #04701.014793, contributing structure) is located along the northern edge of the airfield. It was built by the Navy in asphalt in 1942 and initially measured 5,000 feet long and 300 feet wide. In 1960 it was lengthened to 5,800 feet with a concrete extension at its east end that required a small area of fill into Jamaica Bay. Runway 6 is the only runway that presently retains most of its historic circulation pattern. Runway 6 is identified as the location for the migrant housing (Figure 2).

Access routes required for equipment delivery and administration of the migrant housing include the Main Entrance Road, Barracks Road Complex, Runway 15-33 (Taxiway 10), Taxiways 1 and 2 (the original Runway 6-24), and Taxiway 6 (Figure 2). The Main Entrance Road (built ca. 1951, non-contributing structure) consists of the main public entrance to FBF from Flatbush Avenue to the Main Entrance Gate House and Entrance Guard Booth. The Barracks Road Complex (built ca. 1942, contributing structure) is a system of paved roads through the barracks area. The central road of the Barracks Road Complex, Floyd Bennett Boulevard, runs east-west through the center of the barracks area from the main entrance and continues north to connect with the Naval Aviation Patrol Base Access Road. Runway 15-



33 (Taxiway 10) (built 1930-1945, LCS #041264, NYSHPO #04701.014793, contributing structure) defines the western boundary of the airfield, extending north to south parallel to Flatbush Avenue and the Hangar Row Apron. One of the two runways original to the municipal airport, it presently serves as the main public entrance road to Hangar Row. The present asphalt road was built on top of the original runway, running roughly along the centerline, and taking up approximately one-quarter of the runway surface. The historic runway surface remains intact beneath and to either side of the road. Taxiways 1 and 2 (original Runway 6-24, built 1930-1935, contributing structure) extend perpendicularly from Runway 15-33 (Taxiway 10) just south of the Administration Building/Passenger Terminal (Ryan Visitor Center) to Taxiway 6. Taxiway 1 forms the eastern half and Taxiway 2 the western half of the original Runway 6-24. Taxiway 6 (built 1942, contributing structure) is part of the taxiway system developed during War II for circulation around the periphery of the airfield. Taxiway 6 is surfaced in asphalt and is now used as a road.

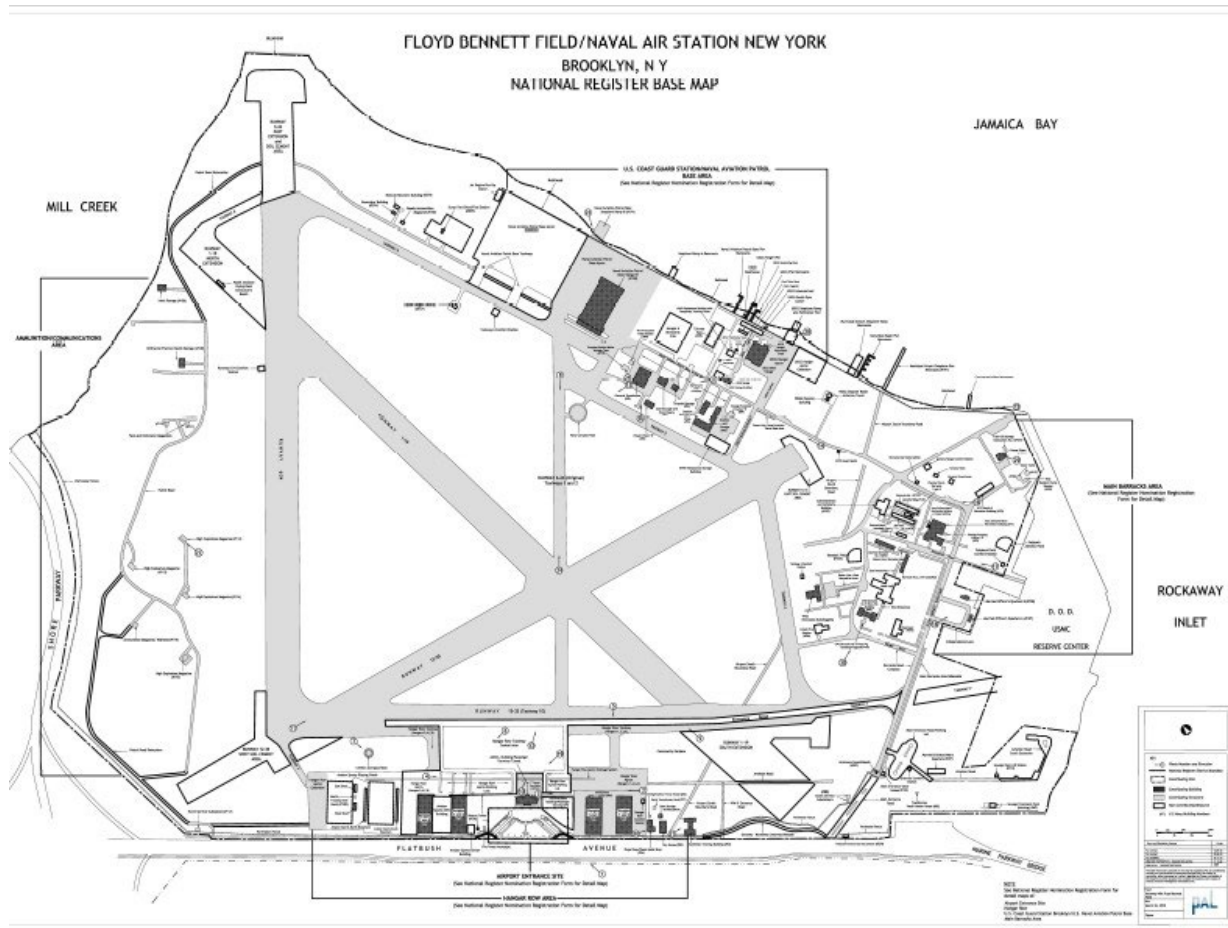


Figure 3. Floyd Bennett Field National Historic District National Register Base Map (from National Registration Form 2010).

Runway 1-19 (built 1935-1942, LCS #041265, NYSHPO #04701.014792, contributing structure) crosses the airfield diagonally from the southwest to the northeast corners (Figure 1 area B and Figure 3). Runway 19 was originally 3,500 feet long and 150 feet wide with a concrete surface. In 1942 it was widened to 300 feet with concrete extensions and lengthened to 5,000 feet, using asphalt at the north end where it intersects Runway 6.

The Airport Entrance Site (built 1932-2006) is a contributing site. The Airport Entrance Drives (built ca. 1932, LCS #041260, associated feature) consist of two diagonal drives from Flatbush Avenue that frame a central lawn area and converge in front of the Administration Building/Passenger Terminal (currently the Ryan Visitor Center) at the Airport Entrance Central Parking Lot (Figure 4). The drives are surfaced in asphalt and edged by concrete curb. The upper ends of the drives are currently closed off with black metal picket fencing.

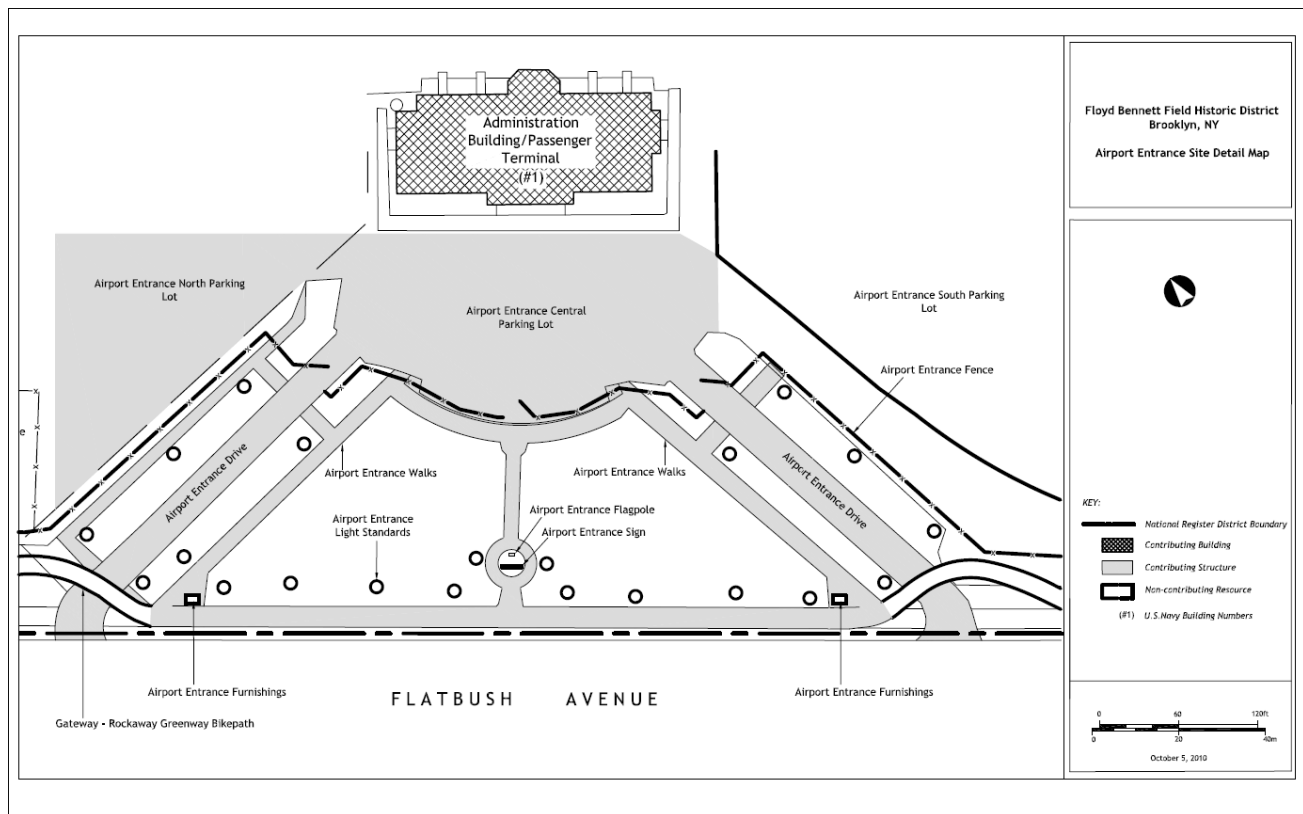


Figure 4. Floyd Bennett Field Airport Entrance Detail Map (from National Registration Form 2010).

The Naval Aviation Patrol Base Apron Extension (built ca. 1952, non-contributing structure) and Naval Aviation Patrol Base Apron Taxiways (built ca. 1952, non-contributing structure) (Figure 1 area C) are adjacent to the Naval Aviation Patrol Base Apron (built 1940-1942, contributing structure), Naval Aviation Patrol Base Seaplane Ramp (built ca. 1942, LCS #174, contributing structure), and Naval Aviation Patrol Base Hangar B (built ca. 1942, LCS #100, contributing building) (Figure 3). The Naval Aviation Patrol Base Apron Extension is currently used as a parking lot with the Naval Aviation Patrol Base Apron Taxiways used as access routes to the parking lot.

While there are no documented precontact or historic archeological sites in the area of potential effect, there is the potential for these resources to be encountered in marshy areas buried below the average 9 feet of fill that comprises the airfield. The southern portion of the current airfield boundaries, however, incorporates what were formerly the upland boundaries of Barren Island, a highly desirable settlement location during both the pre- and post-contact periods. Comprising well drained soils, an abundance of subsistence resources, proximity to fresh water, and high ground overlooking the Atlantic to the south and prime marshland hunting locations to the north, the island would have been a locus of settlement beginning with the stabilization of sea level during the latter half of the Early Archaic Period through the 19<sup>th</sup> and 20<sup>th</sup> century residential and industrial development.

The proposed action would not authorize any penetration or alteration of Runway 6 or 19 for construction and administration of the migrant housing. All structures would be free-standing or secured with water filled ballast or like materials. No penetration of the historic runway or any hardscape is authorized. Repair to approximately 12,000 linear feet of main access routes would correct drainage issues on historic runways and taxiways through mud jacking and patching of existing concrete areas and milling and top coating of existing asphalt. Rehabilitation of the historic entrance to the municipal airport, removal of invasive vegetation, and planting of appropriate native species will enhance the cultural landscape. Ground disturbance will be limited to staking to a depth of less than thirty inches and will be authorized only in NPS-approved areas. The lease does not authorize any digging or trenching. The lease requires that all existing cultural resources and landscape features must be protected from damage or injury and that no actions can be taken that are detrimental to the historical resources. The NPS-collected August 2023 photo points are included as an Appendix to the lease to document pre-project conditions. An August 2023 evaluation of List of

Classified Structures (LCS) within or adjacent to the proposed project area was also completed to document baseline conditions of park cultural resources. While the NPS does not anticipate that the proposed emergency action would have any adverse effects on cultural resources, in accordance with 36 CFR Part 800.12(b)(2), the NPS will notify the New York State Historic Preservation and Tribal Historic Preservation Offices of the Delaware Nation, Delaware Tribe, Stockbridge-Munsee Community, Shinnecock Nation and Shawnee Tribe, and the Advisory Council on Historic Preservation of the emergency situation and will initiate consultations as appropriate.

The NPS finds that the proposed action would not have adverse impacts on cultural resources. Temporary impacts on the viewshed would be expected. Reopening the Airport Entrance Site, repairs to the runways, removal of invasive species, and planting of appropriate native species would benefit the cultural landscape and improve the conditions of the historic district and could help to offset any of the project's temporary impacts. The effects of the project on cultural resources will be fully evaluated under emergency procedures of Section 106 and any as yet unidentified adverse effects would be mitigated.

### Wetlands, Floodplains, and Flooding

FBF is a mostly manmade conglomerate of dredged fills, fly ash, garbage, and other urban fill. Some of the North Forty (the western portion) is also underlain with rubble or other urban materials. The western portion of the North Forty includes one 0.70-acre of a freshwater pond and two freshwater forested/shrub wetlands (9.02 acres total), with the nearest located 185 feet from northern edge of Runway 6. Tidal wetlands are located along the shoreline of Jamaica Bay, including low salt marsh type located north of Hangar B parking lot that is critically imperiled statewide. No impacts to any site wetlands are anticipated from the proposed action, including proposed rehabilitation work for public benefit.

Site elevation is highest in the western portion of Floyd Bennett Field, near Flatbush Avenue at +14 feet NAVD88, and generally decreases to +9.5 feet NAVD in the eastern portion of the site near Taxiway 6. Portions of the project area are located within the 500-year floodplain, as determined by the Federal Emergency Management Agency (FEMA). The eastern portion of Hangar B parking lot and portions of the North Forty are located within the 500-year floodplain, where the elevation is below +9.5 feet NAVD88 and there is a 0.2% annual chance of flooding.

Overall, the potential flood risks associated with the proposed action include risks to human health and life, as well as minor flooding damage risk to temporary housing and associated facilities. Within the project area, flood potential is highest at Hangar B/Sea-Plane Ramp Parking Lot because it is located within approximately 500 feet of Jamaica Bay and along the segment of Flatbush Avenue located within 100 feet of Dead Horse Bay. It should be noted that the proposed temporary migrant housing will primarily be constructed on-top of already built out (hardened) lands formerly constructed as airfield runways. These park lands are situated outside of the 1% annual exceedance probability (AEP) flood within Zone X that constitutes a "moderate" floodplain hazard in FEMA terms (floods that fall between the 0.2 to 1% Annual Exceedance Probability). As such, the flooding risk to government investment is considered acceptable. The risk of inundation, erosion, wave attack, and overtopping potential at the project area is low.

FBF has previously been used by the US Government for emergency relief services stemming from Superstorm Sandy relief, which included housing for 2,000 troops ([US Army 2012](#)). The existing infrastructure and facilities needed to support emergency services can be found nowhere else within NPS lands at this location.

NPS has prepared a Floodplain Statement of Findings (FSOF) to document compliance with Executive Order 11998 (Floodplain Management), as amended by Executive Order 13690. Through the FSOF process, the NPS has determined that there are no practicable, non-floodplain locations for the proposed action. Potential impacts to human life and health would be mitigated through a combination of non-structural risk mitigation measures. Emergency preparedness planning, storm and flood warning, and coordinated evacuation plans and protocols would be protective of human life. The risk to federal capital investment is acceptable, and there is no risk to natural and beneficial floodplain values because the cumulative amount of new permanent infrastructure would be small, above ground, and in previously disturbed and developed areas. All improvements, including storm or flood damage, would be undertaken at the City's sole expense and only with the NPS's prior written approval. Therefore, the NPS finds that the proposed action would not have any additional adverse impacts on floodplains and their associated values.

## Native Vegetation

Natural areas at FBF are named as fundamental resources in the park's 2014 GMP. Most of the areas between the runways and taxiways are managed as natural areas and wildlife habitat.

FBF is a mostly manmade conglomerate of dredged fills, fly ash, garbage, and other urban fill. Some of the North Forty (the western portion) is also underlain with rubble or other urban materials. Nonetheless, a wide diversity of vegetation grows here, including successional maritime forest, northern beach heather dune shrubland, northern bayberry dune shrubland, and a host of human-modified associations such as early successional woodland, northeastern modified successional forest, and northeastern old field. Both successional maritime forest and northern bayberry dune shrubland are vulnerable or imperiled statewide. Within GATE, maritime forest is considered important at FBF because of its rarity at other park sites where it occurs. Hardened areas of the FBF coastline associated with development alternate with eroding mudflats or sandy beaches. Although the grassland growing in the center of FBF is human-modified little bluestem old field, it is important because it is one of the largest remaining grasslands in the New York City area and provides nesting for migratory birds as well as pollinator habitat.

The City selected FBF as suitable for temporary migrant housing in part because of existing hardscaped acreage to accommodate the proposed use. The proposed action would minimize new built facilities and would concentrate them on existing hardscaped areas to avoid any rare vegetation associations. The proposed action could increase park visitation. During hours that the park is open, site contractors, staff and migrants will have use of the park following the same rules as other visitors. Bringing more visitors to FBF would increase the potential for loss of vegetation from trampling, a localized adverse impact. Mitigation measures include site use controls (e.g., temporary fencing, as necessary) and improved signage that would encourage visitor use in authorized areas and authorized trails to limit new adverse impacts on native vegetation in natural areas such as the North Forty and grasslands. The NPS would also limit migrant, City personnel, and/or contractor access to some park areas as necessary to protect native vegetation. Overall impacts to native vegetation would be minimal, and impacted vegetation is expected to return to existing conditions once use of the site for the emergency action ends.



Figure 5. 2008 Floyd Bennett Field National Historic District existing conditions showing the location of woods, managed grasslands and marsh (from Cultural Landscape Report for Floyd Bennett Field (Cody and Auwaerter 2009))

## Nonnative Plants

Large areas of FBF are dominated by nonnative, invasive species such as porcelain berry (*Ampelopsis glandulosa*), Japanese honeysuckle (*Lonicera japonica*), tree of heaven (*Ailanthus altissima*), oriental bittersweet (*Celastrus orbiculatus*), mugwort (*Artemisia vulgaris*) and *Phragmites australis* (the nonnative genotype). Park management of invasive species is conducted as time and resources allow. This localized beneficial impact on native vegetation would continue during the timeframe of the proposed action. In addition, the proposed action would provide for some removal of invasive species and planting of appropriate native species (Figure 2 projects 2, 3 and 4). Efforts associated with the proposed action to control invasive species and revegetate with native species would have localized beneficial impacts.

## Wildlife

Maintenance of the grassland at FBF through mechanical means (primarily mowing) would continue during the timeframe of the proposed action, with localized benefits for grassland nesting birds, including horned lark, eastern meadowlark, upland sandpiper, savannah sparrow, northern harrier, American kestrel, and common barn owl. Many of these species also depend on FBF grasslands for overwintering, as do short-eared owls and rough-legged hawks. Historically, the Jamaica Bay and Long Island region was thought to contain some of the largest contiguous grassland habitats east of the Mississippi River (Drennan 1981, as cited in NYCDEP 2007). Although the 140-acre grassland at FBF is artificially maintained by mowing, it is extremely rare as a remaining large grassland habitat in the New York City area. Its unique character and ability to support wildlife that would otherwise not be present in the park in more than an incidental way provides substantial benefits for grassland species.

The proposed action would construct temporary migrant housing on existing hardscaped areas to avoid wildlife impacts. Increased occupancy and 24-hour use of Leased areas adjacent to grassland and forested habitat, in addition to increased visitor use of trails within these habitats, has the potential for adverse localized impacts on wildlife in the form of disturbance, which may cause wildlife to temporarily avoid certain areas. Mitigation measures including site use controls (e.g., temporary fencing) and improved signage would encourage visitor use in authorized areas and authorized trails to limit new adverse impacts on wildlife. NPS would also limit migrant, City personnel, and/or contractor access to some areas of FBF as necessary to protect wildlife. Impacts to wildlife would be temporary and limited to the duration of the proposed action. A qualified biologist would be onsite to conduct an inspection of the work area for any exterior construction occurring between April 1 and September 1. The biologist would determine if there were nesting activity that could be impacted by the project. If there is, construction activities would be modified or relocated to the greatest extent possible to avoid or minimize impacts. Overall, the proposed action would result in minimal, temporary impacts to wildlife. Impacts would cease and conditions would return to a state similar to existing conditions once use of the site for the emergency action ends.

## Special Status Species

The proposed action does not include in-water work or potential to impact aquatic federal or state listed species that may occur within Jamaica Bay. NPS is conducting informal consultation with US Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act (ESA) on four terrestrial ESA listed species that may occur within the proposed emergency action area.

Piping plover (*Charadrius melodus* - threatened) are not expected to occur within the project area except as occasional transients. Plovers may forage along the FBF shoreline of Jamaica Bay. There is no designated critical habitat for piping plover. The only report in eBird of a piping plover sighting at FBF was one bird in March 2016. The nearest location for annual piping plover nesting is on the oceanside beach on the Rockaway Peninsula at Fort Tilden near Beach 169th Street [located over 1.4 mile (2.3 km) south of the project site]. For these reasons, NPS concludes that the proposed action would have no effect on piping plover.

Roseate tern (*Sterna dougallii dougallii* - endangered) are not expected to occur within the project area except as occasional transients. The species may nest and forage on the Atlantic shoreline of the Rockaway Peninsula and may forage on along the shorelines of FBF and bay beaches within Jamaica Bay. No roseate tern sightings at FBF were identified in eBird. Nesting or loafing roseate terns have been observed occasionally during the past decade on the beach at Breezy Point, which is over 3 miles (4.8 km) from the project area. There is no critical habitat designated for

this species. For these reasons, NPS concludes that the proposed action would have no effect on roseate tern.

Red knots are not expected to occur within the project area except as occasional transients, in part because suitable breeding habitat does not occur within New York. This species breeds in the Canadian arctic region. From mid-March through late November, foraging red knots (*Calidris canutus rufa* - threatened) may occur along the FBF shoreline of Jamaica Bay. The first eBird reported sighting of two red knots at FBF occurred in August 2007. Since then, the greatest number of individuals reported at one time was 71 individuals at an unnamed FBF location in May 2017. The most recent eBird report was of a single individual in late October 2022. The proposed emergency action is located approximately 1 mile (1.6 km) from proposed critical habitat unit NY-4 in Jamaica Bay (88 FR 22530). The proposed action has no potential to temporarily or permanently alter the quality of critical habitat in the project vicinity or the proposed critical habitat unit NY-4. Most of the proposed project area is more than 984 feet (300 m) from the Jamaica Bay shoreline. For these reasons, NPS concludes that the proposed action would have no effect on red knot and that there would be no effect on designated critical habitat for this species.

Northern long-eared bat (*Myotis septentrionalis* - endangered) historically occurred in Kings County. No site-specific survey for bats has been conducted at FBF. The proposed action does not include forest conversion via trimming or removal of vegetation during the active season (April 1 through October 30). The project area is not located within 0.5-mile radius of any known northern long-eared bat hibernacula. For these reasons, NPS concludes that the proposed action would have no effect on the northern long-eared bat.

Monarch butterfly (*Danaus plexippus* - candidate) are known to feed on the nectar of flowering plants such as those in the approximately 140-acre grasslands at FBF in the immediate vicinity of the proposed action. There is no designated critical habitat for this species at FBF. Management of the grasslands will continue as usual and no use or alteration of the grassland area will be authorized as part of the proposed action. Increased activity on and use of runways adjacent to the FBF grasslands as well as increased park visitation related to the proposed action would result in minimal, temporary impacts to monarch butterfly. Impacts would cease and conditions would return to a state similar to existing conditions once use of the site for the emergency action ends. As a candidate species, ESA consultation is not applicable.

State listed and other special status species that may occur in the project action area include barn owl, red-banded hairstreak (butterfly; historic), white-m hairstreak (butterfly; historic), forest blue grass, red pigweed, reflexed flat sedge, and Schweinitz's flat sedge. Increased activity on and use of runways adjacent to forested and grassland habitats as well as increased park visitation related to the proposed action would result in minimal, temporary impacts to these species. Impacts would cease and conditions would return to a state similar to existing conditions once use of the site for the emergency action ends.

### Soundscapes

A 2015 resource brief for GATE provides the best available summary of the park's acoustic environment, using predictions from a geospatial sound model (see Wood 2015). The mean existing sound level at GATE is estimated to be 47.3 dBA (decibels), and the average existing sound level (with the influence of human-caused sounds) is predicted to be 9.9 dBA above natural conditions. The soundscape at FBF has a sound level typical of quiet rural residential areas with little to light automobile traffic (45-50 dBA) and some helicopter overflights associated with New York Police Department (87 dB at 500 ft and 79 dB at 1000 ft) (see *How Loud is a Helicopter? (Comparing Helicopter Noise Levels) | Executive Flyers*).

Noise from temporary construction activities would originate from mechanical equipment. To the extent practicable, construction work would occur during park operating hours. However, some construction related activities could occur outside of those hours. Generators used would be Tier 4 in order to minimize impacts to soundscapes. Generators would be located as far as possible from visitors, migrants, and wildlife. The City will monitor noise levels associated with generator operations to ensure that the noise levels identified in the GATE Superintendent's Compendium of 60 decibels, at 50 feet from the source, are not exceeded. Overall, construction noise impacts would be minimal and temporary.

## Visitor Use and Experience

The human need for recreation and renewal has resulted in an evolving history of traditional and innovative uses of the park's lands and waters to improve the quality of urban life. Intrinsicly connected to the diverse population of the New York metropolitan area, GATE's resources provide unique opportunities for outdoor recreation and rejuvenation in a densely populated and largely impacted metropolitan area. The park's open spaces and wide horizons offer opportunities for resource-based recreation as well as contemplation and reflection. The feelings associated with open space in the high-density metropolitan area and opportunities to recreate through nature observation, water-based activities, walking, hiking, biking, and visiting historic sites are fundamental resources and values.

The GATE 2014 GMP identifies FBF as a year-round destination for daily use and multiple day experiences that include outdoor recreation, community activities, environmental education, preservation and interpretation of the aviation and military history of this historic site, and the protection of grassland, forested and coastal ecosystems. FBF is managed to provide camping opportunities, a community garden, environmental education, access to shorelines and waters of Jamaica Bay for fishing, canoeing, and kayaking, an extensive system of trails for hiking, access to runways and roadways for biking, and the concession operated Aviator Sports Complex. Park management relies heavily upon partnerships to provide and develop recreational opportunities and for the management and reactivation of the structures and spaces at this site.

With annual visitation around 9 million, GATE typically ranks within the top five most visited National Park units. FBF, like many of the sites in GATE, is in the "backyard" of New York City. Going to FBF is routine for many park visitors. A 2015 visitor use survey identified that 22 % of visitors surveyed had visited FBF 21 or more times in the prior 12 months, 50% had visited 2-20 times and 28% had visited only once. Visitor use levels peak in the summer months, decrease in the fall, and are lowest in the winter and spring. In the Jamaica Bay Unit of GATE, 73% of visitors were white, 12% black or African American, and 10% were Asian.

The closure of any areas within FBF would be minimized to only those areas necessary for the proposed action and for the safety and security of park visitors. Certain portions of FBF will be closed to the public by the City for operation and administrative purposes in connection with the proposed action. Access to those areas of the park will be limited to the City, its contractors, migrant residents and others that have been approved by the NPS. Visitors will continue to have access to locations within FBF that provide opportunities for fishing, launching and landing kayaks, biking, walking, running, or parking a car to enjoy views of Jamaica Bay. At FBF, there are five primary hubs of visitor activity. The Hangar B parking lot is one of those hubs. The Hangar B parking lot is the only area of FBF that provides vehicle access to the shoreline and views of Jamaica Bay. Temporary impacts on visitor use of the Hangar B parking lot would occur due to a partial closure of the lot as a result of the proposed action. The NPS does not anticipate that any impacts related to the proposed action will disproportionately affect any particular user groups.

FBF has over 3 miles (5 km) of shoreline. Much of the shoreline is hardened or currently unavailable for visitor use due to access limitations related to adjacent upland forested habitat, land assignments to park partners (New York City Sanitation, New York City Police Department) or the shoreline is part of the US Marine Corps Reserve Center, an inholding within FBF. Public access is focused at approximately 2962 feet (903 m) of shoreline across 5 locations within FBF. The proposed action would restrict access to less than 900 feet (250 m) of shoreline (Figure 1 area C). The primary effect of this limited access would be on visitors that rely upon vehicle access to the shoreline. The impacted area is the only area in FBF in which park visitors can drive up to the shoreline. This is a popular area for fishing, landing and launching of kayaks, and for enjoyment of the Jamaica Bay viewshed.

FBF provides approximately 5.8 miles (9.3 km) of runways, taxiways and roads for biking or running. Vehicle traffic is authorized on 4.3 miles (6.8 km) of that 5.8 miles (9.3 km). There are no protected bike or pedestrian use lanes on any roadways. The proposed action would restrict pedestrian and bicycle access of up to 1.5 mile (2.5 km) on Runways 6 and 19 (Figure 1 areas A and B). There would be no impact to vehicle access since both areas are closed to vehicles.

There is system of trails within the North Forty area of FBF, northwest of Runway 6. Depending upon the season, the Belt Parkway is visible from some parts of the trail system. It is not anticipated that trails will be closed. Increased noise and activity associated with construction and operation of the temporary migrant camp as well as increased use of trails would impact visitor experience on some parts of the trail system.

Three varieties of camping experiences are offered at Floyd Bennett Field and include programmatic camping at Ecology Village, walk-in tent camping at Goldenrod and Tamarack Campground (30 sites), and recreational vehicle (RV) camping at an RV park (12 sites). The Goldenrod and Tamarack Campground and RV camp sites have not been open since 2019. These sites were closed in 2020 and 2021 due to COVID. The sites were not opened in 2022 and 2023 due to staff capacity. No bids were received in response to a 2022 Request for Proposal for use and occupancy to facilitate opening the campground to the public. The Ecology Village camping program is managed by the Appalachian Mountain Club for school and youth groups. The proposed emergency action is not expected to impact programmatic camping at Ecology Village.

The proposed action would increase park visitation. During hours that the park is open, the City's contractors, staff and residents will have use of the park following the same rules as other visitors. NPS would limit migrant, City personnel, and/or contractor access to some park areas and/or amenities as necessary to provide visitor safety. Overall, the proposed action would have minimal and temporary impacts on visitor use and experience, primarily in the form of increased use of specific sites within FBF during operating hours.

### Traffic and Site Circulation

Floyd Bennett Field is located south of Exit 11 on the Belt Parkway (Shore Parkway), a six-lane highway that runs west to northeast across the southern portion of Brooklyn, NY. Commercial traffic is not authorized on NY Parkways. As a major route of transportation in the metropolitan area, traffic is heavy on the Belt Parkway. The 2016 two-way annual average daily traffic (AADT) for Shore Parkway, starting at Rockaway Parkway (Exit 13) travelling southwest toward Flatbush Avenue (Exit 11), was 165,379 vehicles. Flatbush Avenue travels in a northwest to southeast along the western boundary of FBF. The AADT count for Flatbush Avenue, from Shore Parkway to the Marine Parkway Bridge, was 24,420 vehicles. Although less common, access is also available from the south via Beach Channel Drive, Rockaway Point Boulevard, and the Marine Parkway Bridge, which had 2016 AADT counts of 22,616, 6,753, and 21,100, respectively. The average travel time for people commuting in New York City is 36.2 minutes while the average commuter in Kings County drives approximately 42.6 minutes (NYSDOT 2016, USCB 2019). Impacts to area traffic will be mitigated through the City's transportation management plan and mobilization and demobilization plans. Impact to area traffic will be minor and temporary.

Flatbush Avenue is part of the Jamaica Bay Greenway, a 19-mile pedestrian and bicycle loop around Jamaica Bay in Brooklyn and Queens. A protected bicycle lane with access points is located along the eastern side of Flatbush Avenue. NPS allows pedestrians and cyclists to hike and bike the historic runways at FBF (NYCDOT 2019).

According to traffic data, approximately 1,600 vehicles on weekdays and 1,000 vehicles on weekend days access FBF via Aviation Road during non-summer months and up to 3,000 vehicles per day during the summer months, which is a rate of approximately 300 vehicles per hour during typical daytime recreation hours. Peak hour traffic using Aviation Drive is 150 vehicles (morning) to 200 vehicles per hour (evening). Saturday midday peak hour traffic is slightly more than 200 vehicles per day (NPS 2014).

Impacts on traffic and site circulation are expected to be minimal and temporary. Runways 6 and 19 are currently closed to vehicles; therefore, use of those areas under the proposed action would not impact vehicle circulation. While there is no prohibition on pedestrian or cyclist use of runways, taxiways, and roadways within FBF, there are very limited sidewalks and no bike lanes or designated multi-use paths within FBF. As a result, movement throughout FBF is primarily by vehicle. Site circulation would be improved through the rehabilitation and reopening of the historic airport entrance to FBF and repairs to approximately 12,000 linear feet of main access routes within FBF (Figure 2 projects 1 and 5).

### **Coordination with Affected Agencies and Public Outreach**

The NPS has coordinated with the State of New York and New York City officials regarding this emergency action. Throughout the duration of the proposed action, in coordination and collaboration with the NPS, the City will be primarily responsible for all external communications to include questions from media, local residents, businesses, other land users, and local, state, and federal elected officials. The NPS will make this memorandum available to the public.



In accordance with 36 CFR 800.12(b)(2), the NPS has notified the New York State Historic Preservation and Tribal Historic Preservation Offices of the Delaware Nation, Delaware Tribe, Stockbridge-Munsee Community, Shinnecock Nation and Shawnee Tribe, and the Advisory Council on Historic Preservation of the emergency situation and will initiate consultations as appropriate.

The NPS has prepared a FSOF to document compliance with NPS floodplain management procedures for the proposed action. Through the FSOF process the NPS has determined that there are no practicable, non-floodplain locations for the proposed action. Potential impacts to human life, health, and safety would be mitigated through a combination of non-structural risk mitigation measures. Emergency preparedness planning, storm and flood warning, and coordinated evacuation plans and protocols would protect human life, health, and safety. There is no risk to federal capital investment or natural and beneficial floodplain values. All improvements shall be undertaken at the City's sole expense and only with the NPS's prior written approval. Therefore, the NPS finds that the proposed action would not have any additional adverse impacts on floodplains and their associated values.

The NPS has determined the proposed action would have no effect on listed species and is conducting informal consultation with the USFWS under Section 7 of the ESA on four terrestrial ESA listed species that may occur within the proposed emergency action area.

The NPS has determined that the proposed emergency action constitutes an exigent circumstance under the Coastal Zone Management Act as provided in 15 CFR 930.32(b). Once the exigent circumstances have passed, the NPS shall comply with all applicable provisions of 15 CFR part 930, subpart C, to ensure that the activity is consistent to the maximum extent practicable with the enforceable policies of the New York State Department of State Coastal Management Program. The NPS will submit a Consistency Determination to provide a description of actions and supporting policy analysis.

### **Follow-on Actions**

The NPS will conduct some follow-on actions related to site improvements that may not occur until the end of, or after the up to 12-month emergency action period. The follow-on actions will include:

*Public Campground Improvements* – The FBF public campground sites (Goldenrod and Tamarack Campgrounds; Figure 2 project 2), which are across the street from Historic Hangar B, would be used for administrative purposes such as providing a location for office trailers and equipment staging. Minor improvements, such as vegetation maintenance (mowing and trimming) necessary for use to support the emergency action are included in the above analysis. Additional improvements would be required as follow-on actions under the Lease. Consistent with the park's 2014 GMP, camping opportunities would be improved at FBF. The City would be responsible for campground improvements so that the facilities follow current NPS Campground Design Guidelines. The existing 30 public camping sites would be upgraded and an additional 30 sites will be added. Improvements include adding signage, removing hazardous and invasive trees and vegetation, installing fire rings and picnic tables at each site, re-grading the access trail, and building a new permanent restroom facility. Temporary trailers would be required to house additional restroom and shower facilities as well as a camp store.

*Outdoor Education Campus* – The City would be required to develop portions of an outdoor education campus according to existing conceptual designs. This includes garden plots, an outdoor skills course, a gathering pavilion, and parking lot. Actions to accomplish this would include site clearance of invasive plant material, construction of permeable walking trails, rehabilitation of the existing greenhouse, installation of new parking, and visitor amenities. This would need to proceed in coordination with the two park partners involved in this project, Launch and the Jamaica Bay-Rockaway Parks Conservancy.

In general, these actions will be consistent with the park's holistic management approach for coastal resources to improve resiliency and will incorporate principles of energy conservation and sustainability, resulting in long-term beneficial impacts to park resources and values, and to visitor use and experience. Adverse impacts related to the follow-on projects may include short-term, localized, and low intensity impacts to air quality, soundscapes, vegetation, wildlife, and visitor use and experience related to construction activities and temporary closures. The NPS will complete site-specific NEPA compliance, as appropriate, before taking the following actions. Therefore, these actions are not fully covered by these NEPA alternative arrangements.

## Other Alternatives Considered but Dismissed

*Hangars 3 and 4* - Hangars 3 and 4 (49,020 square feet) at Floyd Bennett Field are existing vacant historic structures that were constructed in 1931. Hangars 3 and 4 are contributing resources in the Floyd Bennett Field Historic District which was listed on the National Register of Historic Places. They have not been restored or rehabilitated and are currently vacant and deteriorated. The building shell is showing signs of failure that left uncorrected will result in damage that is beyond reasonable repair. The interior is aged, and the utilities and systems are either inoperable, inadequate, or non-compliant with current codes and standards. The building is only suitable as semi-protected storage space in its current condition, and even that use is put at risk by continued neglect. Although the NPS is currently preparing plans to rehabilitate the structures, no work has yet begun.

Within the Jamaica Bay Unit, there are no other sites where emergency activities of a similar nature have previously been sited; have a lower potential for impact on park resources, operations, or public uses; or have available hardscaped areas of sufficient acreage with a low risk of flood potential to accommodate the emergency activities.

**Based on my review I have decided to proceed with the proposed action and mitigation commitments.**



**Date: September 11, 2023**

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Charles F. Sams III  
Director  
National Park Service

### **Approval of Decision Memorandum and Environmental Review:**

I have determined that an emergency situation exists such that agency actions must be taken prior to preparing NEPA analysis and documentation. I concur with the National Park Service's review and findings that the impacts of these actions are not anticipated to be significant. I hereby grant the National Park Service's request for alternative arrangements.

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Joan M. Mooney  
Principal Deputy Assistant Secretary  
Exercising the Delegated Authority of  
Assistant Secretary—Policy, Management and Budget  
Department of the Interior