GOWANUS CANAL SUPERFUND COMMUNITY ADVISORY GROUP

ARCHAEOLOGY COMMITTEE

March 4, 2020

Dear Christos,

The Gowanus Canal Superfund Community Advisory Group (CAG) has formally tasked us, the CAG's Archaeology Committee, with providing input in response to the memorandum from DEP's contractors regarding Gowanus Station bricks, which in turn was provided to EPA in light of the requirements of the February 2019 MOA between EPA and SHPO.

On behalf of the CAG, which previously called for retention of the historic Gowanus Station building in full on its current site, here is our response:

- 1. Thank you for thoughtful consideration and actions regarding the MOA solution, which will preserve key aspects of this historic edifice and maintain a rooted sense of place in our rapidly changing neighborhood. Please insist that the preservation/reconstruction of the required facade walls happens in a timely manner, as required in the signed MOA, and do not allow DEP to reconstruct anything less than the entirety of what is envisioned and required by the MOA (and illustrated in the attached DEP rendering).
- 2. If deconstruction of the building and subsequent reconstruction (the bare minimum under the MOA) is chosen as the way forward, salvaged bricks from Gowanus Station's exterior walls must be re-used in the reconstruction of the required facades to the maximum extent possible at a minimum, no less than the 16,900 brick figure quoted by DEP's contractors in the memo.
- 3. Salvaged bricks from Gowanus Station's interior should be re-used in the reconstruction of the facades where possible as suggested in the memo by DEP's contractors to the extent that any such bricks are fit for the purpose.
- 4. To the extent that any additional historic bricks are required to fill out the remainder of the facades, they should be sourced from the exterior stable wall running along Nevins Street south of Gowanus Station, as there are no current plans to save or salvage that venerable structure and, as the attached photos make very clear, that structure is comprised of bricks identical to those of Gowanus Station the ornamental scrollwork, bluestone sills, and brick work are all the same. This is so stunningly obvious, it's hard to understand why this was not previously suggested as a solution. (We are currently working to confirm the contemporaneous date of design/construction via documentary evidence at the DEP Archive).

- 5. In reconstructing the required facades, the CAG's preference is for the original window openings that are currently bricked in to be reopened and reglazed with transparent or translucent material to permit light to radiate out from the interior. This would give a sense of life and vibrancy to the building, better reflecting the nature of the surrounding community. An architectural firm with specific conservation expertise should be consulted to accomplish this goal. (See attached 1939-40 tax photo)
- 6. The CAG, in reviewing the time, costs, complexity, and risks involved in the deconstruction and reconstruction of the required walls encourages EPA, SHPO, and DEP to consider whether retaining and stabilizing the required facades in place during construction would be more effective than complete disassembly, cleaning, and reconstruction, which will surely increase risk to the salvage of the important architectural elements. It is not impossible for DEP to go beyond the baseline requirements of the MOA by retaining the facades in place. The skilled craftsmanship embedded at the time of the building's construction in fine brick work, very thin mortar application (not available today), and careful installation of sculptural terra cotta...each aspect is impossible to replace (loss of these elements would undoubtedly reduce the overall aesthetic and historic value of the reconstructed set of facades).
- 7. An independent architectural firm with conservation expertise should be immediately consulted to address the above items as well as review the proposed design of the reconstructed required facades. We feel the current plans lack a conservation perspective and that the design was created by a firm lacking in architectural conservation expertise. The omission of any consideration of the immediately adjacent stable wall along Nevins Street as a source for bricks, as well as the proposed dismantling and partial reconstruction approach, provide sufficient evidence of that deficiency. (We are currently speaking with the New York Landmarks Conservancy about bringing in an independent expert to review the memo and view the building irrespective of whether an independent expert will be provided by the PRPs, SHPO, or EPA).

Please also note that in the attached architect's sectional drawing, excavation does not extend under the foundation of 234 Butler itself. (*Drawing attached*)

Again, thank you for your consideration.

Respectfully,

Gowanus CAG Archaeology Committee for the Gowanus Canal Superfund CAG