17

Public Health

This chapter addresses the Proposed Project's effect on public health. As defined by the *2021 City Environmental Quality Review (CEQR) Technical Manual*, public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability, and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts on human health may occur as a result of a proposed project, and if so, to identify measures to mitigate such effects.

Introduction

The *2021 CEQR Technical Manual* states that a public health assessment is not necessary for most projects. Where no significant unmitigated adverse impact is found in other CEQR analysis areas related to public health—such as air quality, water quality, hazardous materials, or noise—no public health analysis is warranted. If, however, an unmitigated significant adverse impact is identified in any of these other CEQR analysis areas, the lead agency may determine that a public health assessment is warranted for that specific technical area.

As described in the relevant analyses of this EIS, upon completion of construction, the Proposed Actions would not result in significant adverse impacts in any of the technical areas related to public health. The relevant analyses for the consideration of public health impacts are summarized and reviewed in this chapter.

Principal Conclusions

As described in the relevant analyses of this EIS, the Proposed Actions 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.

Due to contamination on the Development Site, Block 4434, Lot 10 has already been entered into the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) and shall be remediated in accordance with the BCP requirements under NYSDEC regulatory oversight and pursuant to a Brownfield Cleanup Agreement (BCA) Index No. C224290-04-19 dated May 31, 2019. To address the conditions identified on Block 4434, Lot 1, a BCP application and Remedial Investigation Work Plan (RIWP) were submitted to the NYSDEC on January 13, 2022 and were issued for public comment on March 23, 2022. If the site is accepted into the BCP, hazardous materials remedial requirements associated with Block 4434, Lot 1 shall be completed under the NYSDEC BCP with regulatory oversight provided by NYSDEC and NYSDOH, similar to Block 4434, Lot 10. A comprehensive RI will be implemented and documented in a RIR, followed by the preparation of a RAWP and CHASP. Upon completion of the approved remedial action, a FER shall be completed and submitted to NYSDEC and NYSDOH for review and approval. Any potential ICs/ECs relating to site management would be followed in accordance with an NYSDEC-approved SMP. Further, the Proposed Actions would include the placement of an (E) Designation (E-679) for the entire Development Site (Brooklyn Block 4430, Lot 1; Block 4434, Lot 1 and 10). Therefore, the Proposed Actions would not result in any significant adverse impacts with respect to hazardous materials for the Development Site.

The analysis of operational air quality showed that the Proposed Actions would not result in significant adverse air quality impacts from stationary sources including the proposed garages' emissions. A refined analysis of emissions from the HVAC and hot water systems demonstrated that if the fuel is restricted to natural gas, low NO_x boilers are used, and requirements to the stack height for all proposed buildings are memorialized in the (E) Designation (E-679), significant adverse impacts are not anticipated. Additional horizontal restrictions would be imposed on Building 4 in order to avoid significant adverse air quality impacts. A microscale mobile source analysis was conducted for the intersection of Louisiana and Flatlands Avenues, the selected worst-case location. The highest predicted CO and PM concentrations were below respective National Ambient Air Quality Standards (NAAQS) and the City's *de minimis* value.

Mobile source noise levels would increase by up to 1.2 dBA for the With-Action condition compared to No-Action condition due to traffic generated by the Proposed Actions. Therefore, there would be no potential for significant adverse noise impacts due to mobile sources.

The residential property at 1 Vandalia Avenue, located southeast of the Development Site, includes a 10-story portion approximately 108 feet from the Development Site and the

proposed rooftop basketball court. With-Action noise levels at this receptor including stationary and mobile sources would range from 58.0 to 67.6 dBA (Leq). The Proposed Actions would result in an increase of up to 1.6 dBA (Leq) in noise from the No-Action noise levels. Since noise levels would not increase by 3 dBA or more at these receptors, there would be no significant adverse impacts due to mobile and stationary noise sources.

The residential building at 1180 Pennsylvania Avenue is approximately 80 feet from the Development Site and proposed daycare recreational area (to be located at Proposed Building 4). With-Action noise levels at this receptor including stationary and mobile sources would range from 59.4 to 67.7 dBA (Leq). The Proposed Actions would result in an increase of up to 6.5 dBA (Leq) in noise from No-Action noise levels. While the detailed noise analysis concluded that the Proposed Actions could result in noise levels exceeding noise impact criteria for greater than 5 dBA, as this residential building would not experience noise levels in exceedance of 85 dBA, the Proposed Actions are not anticipated to cause excessively high chronic noise exposure and therefore, are not expected to result in a significant adverse public health impact related to operational noise.

As described in **Chapter 9, Natural Resources** and **Chapter 11, Water and Sewer Infrastructure**, the Proposed Actions would not result in significant adverse impacts. Therefore, no water quality impacts are anticipated as a consequence of the Proposed Actions.

In regard to construction impacts from the Proposed Project, with the aforementioned regulatory oversight on the Development Site through the BCP, BCA, and the (E) designation (E-679), the Proposed Actions would not result in any significant adverse impacts with respect to hazardous materials for the Development Site during the construction period. Furthermore, the Proposed Project would not result in significant adverse impacts on air quality during construction. The results of the quantitative on-site construction analysis indicate that the Proposed Project would not exceed NO_2, PM_{10}, and CO NAAQS. In addition, the maximum predicted 8-hour CO concentration would be well below and incremental concentrations of $PM_{2.5}$ would not exceed the City's de minimis criteria. Finally, comparison of intersection traffic under construction conditions with operational conditions demonstrated no potential for significant adverse CO and PM impacts from construction-related traffic.

Construction activities would adhere to existing construction noise regulations and the implement a Construction Noise Mitigation Plan, as required by the New York City Noise Code, including an 8-foot construction noise barrier, and while construction noise would be reduced, the Proposed Actions would result in the potential for significant adverse construction noise impacts. In total, exterior construction noise levels would exceed the exterior increase thresholds at seven buildings throughout the Development Site, including three existing buildings and four buildings that would be introduced by the Proposed Actions during the phased development. None of the existing or Proposed Buildings in the vicinity of the Development Site would experience elevated noise levels in exceedance of 85 dBA. Additionally, as described in **Chapter 19 Construction,** the predicted noise levels due to construction are associated with specific pieces of equipment that operate intermittently during the construction period. The detailed noise analysis concluded that the Proposed Action could result in noise levels exceeding the noise impact criteria of greater than 15 dBA for 12 months or more or 20 dBA for 3 months or more. No analyzed noise receptors are

expected to experience exterior noise levels in exceedance of the 85 dBA public health threshold. Therefore, there would not be significant adverse public health impacts due to construction of the Proposed Action.

Finally, all project work would be performed under a NYSDEC-approved Stormwater Pollution Prevention Plan (SWPPP) to be prepared in with the terms and conditions of the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity (GP-0-20-001, January 2020). No project work or equipment and materials storage would occur within or adjacent to wetlands. Various project erosion and silt controls would be installed and maintained pursuant to the New York State Standards and Specifications for Erosion and Sediment Control (2016). Thus, significant adverse impacts to public health from construction activities are not anticipated.

Methodology

As noted above, the *CEQR Technical Manual* states that where no significant unmitigated adverse impact is found in other CEQR analysis areas related to public health—such as air quality, water quality, hazardous materials, or noise—no public health analysis is warranted. If, however, an unmitigated significant adverse impact is identified in any of these other CEQR analysis areas, the lead agency may determine that a public health assessment is warranted for that specific technical area. Where significant adverse construction-period noise impacts are identified, it is the New York City Department of City Planning's practice to examine the potential for these construction-period noise impacts to affect public health.

Assessment

Operational Period

Hazardous Materials

Potential health exposures from hazardous materials in soil and dust include metals, hazardous compounds, or dust conditions that the public can be exposed to through ingestion, inhalation, or dermal contact. Health effects of exposure can lead to poisonings, gastroenteric illnesses, chronic illnesses, asthma, or respiratory complaints. The potential for health impacts associated with hazardous materials can be evaluated in terms of potential concentrations from the analysis in **Chapter 10, Hazardous Materials.**

As detailed in **Chapter 10, Hazardous Materials**, subsurface investigations throughout the Development Site confirmed the presence of contamination associated with landfilling activities, a historic gasoline filling station, and auto wrecking on the site. In order to address this contamination, two approaches would be taken with the approval of the Proposed Actions. First, Block 4434, Lot 10 has already been entered into the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) and shall be remediated in accordance with the BCP requirements under NYSDEC regulatory oversight and pursuant to a Brownfield Cleanup Agreement (BCA) Index No. C224290-04-19 dated May 31, 2019. To address the conditions identified on Block 4434, Lot 1, a BCP application and Remedial Investigation Work Plan (RIWP) were submitted to the NYSDEC on January 13, 2022 and were issued for public comment on March 23, 2022. If the site is

accepted into the BCP, hazardous materials remedial requirements associated with Block 4434, Lot 1 shall be completed under the NYSDEC BCP with regulatory oversight provided by NYSDEC and NYSDOH, similar to Block 4434, Lot 10. A comprehensive RI will be implemented and documented in a RIR, followed by the preparation of a RAWP and CHASP. Upon completion of the approved remedial action, a FER shall be completed and submitted to NYSDEC and NYSDOH for review and approval. Any potential ICs/ECs relating to site management would be followed in accordance with an NYSDEC-approved SMP. Further, the Proposed Actions would include the placement of an (E) Designation (E-679) for the entire Development Site (Brooklyn Block 4430, Lot 1; Block 4434, Lot 1 and 10). The (E) Designation provides a mechanism for regulatory oversight for future remedial action as a pre-construction requirement to ensure the potential risks or exposures associated with the presence of hazardous substances shall be reduced or eliminated to the maximum extent possible as related to the hazardous materials present. Therefore, the Proposed Actions would not result in any significant adverse impacts with respect to hazardous materials for the Development Site.

With the absence of significant adverse impacts to hazardous materials, there is no potential for an adverse impact to public health as a result of exposure during the operational period.

Air Quality

Potential health exposures from inhalation of air pollutants such as fine particles, CO, NO_2 and ozone can lead to the exacerbation of asthma symptoms and can contribute to poor cardiovascular and respiratory health outcomes. Health effects may also occur from exposure to other pollutants from combustion and process emissions such as VOCs. The potential for health impacts associated with air quality conditions can be evaluated from the results of the analysis detailed in **Chapter 14, Air Quality**.

As detailed in **Chapter 14, Air Quality**, the air quality analysis of the Proposed Actions addressed mobile source, parking facilities, and HVAC and hot water system emissions. No industrial, large or major sources were identified in the close vicinity of the project site and therefore no impacts from such sources were considered.

Mobile source analysis results indicated that at traffic emissions at the worst intersection, the intersection of Louisiana and Flatlands Avenues, selected for analysis would not result in concentrations above the respective National Ambient Air Quality Standards (NAAQS) or the City's *de minimis* thresholds. No significant impacts from CO or PM traffic emissions are anticipated.

Several parking facilities are planned in the Proposed Actions, three subgrade garages under the proposed buildings and a seven-story naturally ventilated garage structure. The air quality analysis of emissions from these facilities indicated that no significant adverse air quality impacts are expected from the proposed garages.

A refined analysis of emissions from the HVAC and hot water systems of each individual proposed building as well as of all these buildings cumulatively demonstrated that with certain restrictions memorized in the (E) Designation (E-679), no significant adverse air quality impacts are anticipated from these sources. The (E) Designation restricts the fuel to natural gas, asks to use low NO_x boilers and sets requirement to the stack height for all

proposed buildings. Additional horizontal restrictions are imposed on Building 4 in order to avoid significant adverse air quality impacts.

As the results of the air quality analysis demonstrated that the Proposed Actions would not generate any significant adverse air quality impacts, the potential for public health impacts from the Proposed Actions emissions is also insignificant.

Noise

Prolonged exposure to high noise levels has the potential to decrease quality of life, raise blood pressure and myocardial infarctions. Chronic exposure to levels above 85 dBA will eventually harm hearing. Noise modeling results from **Chapter 16, Noise** assess whether there will be exceedances of allowable noise levels that may result in public health impacts.

As detailed in **Chapter 16, Noise**, mobile source noise levels would increase by up to 1.2 dBA for the With-Action condition compared to No-Action condition due to traffic generated by the Proposed Actions. Therefore, there would be no potential for significant adverse noise impacts due to mobile sources.

The residential property at 1 Vandalia Avenue, located southeast of the Development Site, includes a 10-story portion approximately 108 feet from the Development Site and the proposed rooftop basketball court. No-Action noise levels at this receptor would range from 56.5 dBA to 66.7 dBA (Leq). With-Action noise levels at this receptor including stationary and mobile sources would range from 58.0 to 67.6 dBA (Leq). The Proposed Actions would result in an increase up to 1.6 dBA (Leq) in noise. Since noise levels would not increase by 3 dBA or more at these receptors, there would be no significant adverse impacts due to mobile and stationary sources.

The residential building at 1180 Pennsylvania Avenue is approximately 80 feet from the Development Site and proposed daycare recreational area. No-Action noise levels at this receptor would range from 52.8 to 66.5 dBA (Leq). With-Action noise levels at this receptor including stationary and mobile sources would range from 59.4 to 67.7 dBA (Leq). The Proposed Actions would result in an increase up to 6.5 dBA (Leq) in noise from No-Action noise levels. While the detailed noise analysis concluded that the Proposed Actions could result in noise levels exceeding noise impact criteria for greater than 5 dBA, as this residential building would not experience noise levels in exceedance of 85 dBA, the Proposed Actions are not anticipated to cause excessively high chronic noise exposure and therefore, are not expected to result in a significant adverse public health impact related to operational noise.

Based on the noise modeling for new sensitive receptors, the With-Action noise conditions would require specific window/wall attenuation on certain facades of all of the proposed buildings (see **Chapter 16, Noise**). An (E) Designation (E-679) would be applied to the Development Site specifying the required window/wall attenuation and an alternate means of ventilation. While the detailed noise analysis concluded that the Proposed Actions could result in With-Action sound levels exceeding the noise exposure guidelines for new receptors, these new receptors would not experience noise levels in exceedance of 85 dBA. The Proposed Actions are, therefore, not anticipated to cause excessively high chronic noise exposure and are not expected to result in a significant adverse public health impact related to operational noise.

Water Quality

Potential exposures to contaminated water (potable, non-potable, and recreational) from ingestion or secondary contact can cause infectious disease, neurologic effects, and kidney or other organ system effects, or cancers. The potential effects of a project's impact of water quality can be assessed from its potential to impact surrounding natural resources or water systems as analyzed in **Chapter 9, Natural Resources** and **Chapter 11, Water and Sewer Infrastructure**.

The Fresh Creek Nature Preserve and Jamaica Bay are located within the vicinity of the Project Area. As detailed in **Chapter 9, Natural Resources**, the Fresh Creek Nature Preserve contains undeveloped upland and wetland habitats, including ecologically valuable surface water and tidal wetland communities. The tidal wetland communities of the Fresh Creek Nature Preserve provide a number of important ecological functions, including sequestration of nutrients and pollutants and therefore important public health benefits regarding water quality. Jamaica Bay is located approximately 1.25 miles to the south of the Project Area and includes extensive areas of terrestrial lands, underwater lands, and surface waters and drains a surrounding watershed of approximately 142 square miles that includes the Project Area. The chief issues facing Jamaica Bay is the degradation of water quality due to increasing human population and development within the surrounding watershed, resulting in increased impervious surfaces within the Jamaica Bay Watershed and increased sewage discharge, solid waste, and stormwater runoff to the bay, which impact water quality.

As detailed in **Chapter 11, Water and Sewer Infrastructure** the Proposed Project would ensure the appropriate management of project-generated solid waste and sanitary wastewater, and storm water. The Proposed Project would incorporate stormwater best management practices (BMPs) through the incorporation of detention and infiltration techniques such as green and blue roofs, subsurface detention and infiltration, and permeable pavement. One or a combination of these techniques could control peak runoff rates, and the implementation plan will be determined with further refinement of the building design and in consultation with NYC Department of Environmental Protection (DEP). Stormwater source control BMPs that would be required as part of the site connection approval process, with the review and approval of DEP, would reduce the overall volume of sanitary sewer discharge and stormwater runoff as well as the peak stormwater runoff rate from the Project Area. Therefore, there would be no significant adverse impacts on stormwater conveyance infrastructure.

As detailed in **Chapter 9, Natural Resources**, the implementation of BMPs as discussed above and in **Chapter 11, Water and Sewer Infrastructure** and conformance with NYC DEP, NYSDEC and other regulatory agency regulations and permitting requirements, the Proposed Actions are consistent with the applicable NYC DEP Water Quality and Stormwater Objectives for Jamaica Bay included in the Jamaica Bay Watershed Protection Plan Volume II. Therefore, no significant adverse impacts to natural resources are anticipated due to implementation of the Proposed Actions.

With the absence of significant adverse impacts to natural resources and water infrastructure, there is no potential for an adverse impact to public health as a result of water quality impacts in the operational period.

Construction Period

Hazardous Materials

As discussed above and detailed in **Chapter 10, Hazardous Materials**, to avoid the potential for significant adverse impacts relating to hazardous materials on the Development Site, Block 4434, Lot 10 will be enrolled in the NYSDEC BCP and shall be remediated in accordance with the BCP requirements under NYSDEC regulatory oversight and pursuant to a BCA Index No. C224290-04-19 dated May 31, 2019. To address the conditions identified on Block 4434, Lot 1, a BCP application and Remedial Investigation Work Plan (RIWP) were submitted to the NYSDEC on January 13, 2022 and were issued for public comment on March 23, 2022. If the site is accepted into the BCP, hazardous materials remedial requirements associated with Block 4434, Lot 1 shall be completed under the NYSDEC BCP with regulatory oversight provided by NYSDEC and NYSDOH, similar to Block 4434, Lot 10. A comprehensive RI will be implemented and documented in a RIR, followed by the preparation of a RAWP and CHASP. Upon completion of the approved remedial action, a FER shall be completed and submitted to NYSDEC and NYSDOH for review and approval. Any potential ICs/ECs relating to site management would be followed in accordance with an NYSDEC-approved SMP. An (E) Designation (E-679) would also be placed over the entire Project Area to provide a mechanism for regulatory oversight for future remedial action as a pre-construction requirement to ensure the potential risks or exposures associated with the presence of hazardous substances shall be reduced or eliminated to the maximum extent possible as related to the hazardous materials present. Therefore, the Proposed Actions would not result in any significant adverse impacts with respect to hazardous materials for the Development Site during the construction period.

With the absence of significant adverse impacts to hazardous materials, there is no potential for an adverse impact to public health as a result of exposure during the construction period.

Air Quality

As detailed in **Chapter 19, Construction**, Phase 1B was determined to be the peak period for construction air quality emissions. Based on the results of the emissions intensity and quantitative construction air quality analysis for on-site emissions (construction equipment, trucks and fugitive dust from construction of foundations for Buildings 3 and 4 (in Phase 1B) and truck idling and moving on paved and unpaved roads) and based on a comparison to the operational analysis for off-site construction traffic, the Proposed Project would not result in significant adverse impacts on air quality during construction. The results of the quantitative on-site construction analysis indicate that the Proposed Project would not exceed NO_2, PM_{10}, and CO NAAQS. In addition, the maximum predicted 8-hour CO concentration would be well below and incremental concentrations of $PM_{2.5}$ would not exceed the City's de minimis criteria. Finally, the emissions intensity analysis that compares conditions under construction conditions with operational conditions demonstrated no potential for significant adverse CO and $PM_{2.5}$ impacts from construction-related traffic.

Noise

As detailed in **Chapter 19, Construction**, construction of the Proposed Project would involve standard construction activities and practices for buildings in New York City.

Foundation installation and superstructure phases of construction are typically when the noisiest activities occur. The exterior and interior fit-out phases of construction typically involve minimal exterior equipment and substantially quieter noise conditions. The Development Site is near existing residential, community facility, and commercial land uses, and the introduction of new residences would occur throughout construction of the phased development. Based on the proximity of these noise-sensitive land uses, there is the potential for construction to cause significant adverse noise impacts.

Construction noise from mobile sources has been evaluated from 6:00 AM to 7:00 AM, when construction traffic would be greatest since this is the period that most worker vehicles and trucks arrive at the Development Site. This is a period prior to construction activities and noise from stationary construction equipment would occur. Construction noise from mobile sources would not increase by 3 dBA or more and there would be no significant adverse noise impact due to construction mobile sources.

Construction noise from stationary sources has been evaluated for 16 different phases of construction. For each phase of the Proposed Development (i.e., Phase 1A, Phase 1B, Phase 2A1, Phase 2A2, Phase 2B, and Phase 2C) there would be foundation, superstructure, elevators, exterior construction, and interior fit-out phases of construction of the proposed buildings (i.e., Buildings 1, 2, 3, 4, 5, 6, 7/8, 9/10 and the PAC). See **Chapter 19, Construction** for further details on the period and duration of the different phases of construction.

The potential for significant adverse construction noise impact depends on the intensity and duration of construction activities. As it relates to the Public Health, construction noise would be a significant adverse noise impact if noise levels exceed 85 dBA for a prolonged period of time. If construction noise levels would occur continuously for 24 months or more, a detailed construction noise analysis is warranted and there is a potential for significant adverse noise impact. Construction noise occurring for shorter durations would not typically result in significant adverse noise impact unless there is a higher intensity of noise. For example, construction may cause significant adverse impact if exterior noise levels would increase by 15 dBA or more for 12 months or more or 20 dBA or more for a period of 3 months or more. These criteria apply to residential, community facility, and commercial office spaces, but do not apply to retail spaces. The potential effect of construction noise is also evaluated according to interior noise criteria which are 45 dBA (L10) for residential spaces and 50 dBA (L10) for commercial office spaces.

In total, exterior construction noise levels would exceed the exterior increase thresholds at seven buildings throughout the Development Site, including three existing buildings and four buildings that would be introduced by the Proposed Actions during the phased development. The following summarizes the results of the construction noise assessment at the closest receptors surrounding the Proposed Project.

- There would be a total of six buildings where construction noise levels would increase by 20 dBA or more over existing conditions for three months or longer including:
  - Proposed Building 2
  - Proposed Building 3
  - Proposed Building 4
  - 1180 Pennsylvania Avenue

- 1170 Pennsylvania Avenue
- 1 Vandalia Avenue

› There would be a total of six buildings where construction noise levels would increase between 15-20 dBA over existing conditions for 12 months or longer including:

- Proposed Building 1
- Proposed Building 2
- Proposed Building 3
- Proposed Building 4
- 1180 Pennsylvania Avenue
- 1170 Pennsylvania Avenue

As presented in **Chapter 20 "Mitigation"**, potential measures to mitigate the significant adverse construction noise impacts were explored. The impacted existing residential buildings near the Projected Development have insulated glass windows and through-wall air-conditioning, which would be expected to provide 25 dBA window/wall attenuation. Buildings constructed as part of the Proposed Actions are expected to have insulated glass windows and central air-conditioning. Additionally, Facades of specified Proposed Buildings identified in **Chapter 16 "Noise"** are also required to have a minimum OITC rating up to 35 dBA window/wall attenuation. These provisions would reduce the expected interior noise levels at these residential buildings.

None of the existing or Proposed Buildings in the vicinity of the Projected Development Site would experience elevated noise levels in exceedance of 85 dBA. Additionally, as described in **Chapter 19 "Construction",** the predicted noise levels due to construction are associated with specific pieces of equipment that operate intermittently during the construction period. The detailed noise analysis concluded that the Proposed Action could result in noise levels exceeding the noise impact criteria of greater than 15 dBA for 12 months or more or 20 dBA for 3 months or more. No analyzed noise receptor is expected to experience exterior noise levels in exceedance of the 85 dBA public health threshold. Therefore, there would not be significant adverse public health impacts due to construction of the Proposed Action.

Water Quality

As detailed above, the protection of nearby natural resources is important to the maintenance of water quality, which is connected to public health. In order to protect nearby water resources during the construction period, as detailed in **Chapter 19, Construction**, all project work will be performed under a NYSDEC-approved Stormwater Pollution Prevention Plan (SWPPP) to be prepared in with the terms and conditions of the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity (GP-0-20-001, January 2020). No project work or equipment and materials storage will occur within or adjacent to wetlands. Various project erosion and silt controls will be installed and maintained pursuant to the New York State Standards and Specifications for Erosion and Sediment Control (2016).