

Karen Argenti  
[kabx101@gmail.com](mailto:kabx101@gmail.com)  
November 27, 2019

Hon. Erik Kulleseid  
Commissioner, New York State Office of Parks, Recreation and Historical Preservation  
625 Broadway  
Albany NY 12207    via email to: [erik.kulleseid@parks.ny.gov](mailto:erik.kulleseid@parks.ny.gov)

Re:    Jerome Park Reservoir and Aqueduct Rehabilitation,  
NYC DEP, NYSOPRHP #15PR05283

Dear Erik:

Congratulations on your new role back in NYS Parks as Commissioner! You may remember we met years ago on a tour of the area around Yankee Stadium. I was wondering if you could help, once more.

The purpose of this letter is to bring your attention to a recent letter from the Division for Historic Preservation. The history of this project within the Department is first an October 9, 2015 letter, second a June 16, 2017 letter based on an alternative analysis report, and a third June 7, 2019 letter.

The concern is how can the Department issue a third letter based on changes described in the DEP prepared “Modified Negative Declaration” without a full Alternative Analysis as promised in the previous letters, especially as there is a new change?

Fact 1. In the October 29, 2019 Modified Negative Declaration, the DEP asserted that the East Wall of the North Basin would be “routinely exposed in the north basin instead of the original design intent to keep it below the water line.”

Fact 2. The *Alternatives Analysis for The Jerome Park Reservoir and Aqueduct Rehabilitation*, City of New York Department of Environmental Protection, Bureau of Engineering Design and Construction, NYSOPRHP #15PR05283, dated January 2017, pages 1-2:

“Beth Cumming, the Senior Historic Site Restoration Coordinator and NYSOPRHP reviewer, noted that the proposed rehabilitation project constitutes a significant modification to the Reservoir but approved the proposed work based on two conditions. The No Adverse Effect conditions, as noted in the NYSOPRHP letter of 10/9/15 (Appendix A), are:

(1) The cast-in-place concrete buttress wall proposed to be constructed against the existing east reservoir wall shall, under normal operations, be below the water line.

(2) For any of the proposed work where a “new capstone” is proposed; the new capstone shall match the historic.

If either of these conditions cannot be met, NYSOPRHP would anticipate submission of a full Alternatives Analysis (AA) of the proposed rehabilitation, as per the MOA and Section 106 of the National Historic Preservation Act of 1966 (Beth Cumming, personal communication to Cece Saunders, HPI, 3/28/16)." [underlining added]

Fact 3: Below is the way that the reservoir will look typically.



In summary, it would seem that an alternative analysis of this new change is required as per the DEP report referenced in #1 above and in the October 11, 2016 Letter from NYSOPRHP.

Thank you for your time and consideration. Let me know if you need the documents.

Sincerely,

Karen Argenti  
646-529-1990