APPENDIX A

NYC Waterfront Revitalization Program Policy Evaluation and Consistency Assessment Form

A. NEW YORK COASTAL ZONE MANAGEMENT PROGRAM

This appendix examines the compliance of the proposed amended drainage plans with New York State and City coastal zone management policies.

The *New York City Waterfront Revitalization Program* (WRP) is the City's principal coastal zone management tool. The WRP provides the city's policies for management of the coastal zone as well as a framework for evaluating discretionary actions in the Coastal Zone. These policies are examined below.

B. NEW YORK CITY WATERFRONT REVITALIZATION POLICIES

The New York City WRP is comprised of 10 policies aimed at maximizing the benefits derived from economic development, environmental conservation, and public use of the waterfront, while minimizing the conflicts. Each policy is presented below, followed by a discussion of the applicability of the policy to the proposed amended drainage plan and consistency of the plans with those policies.

Policy 1: Support and facilitate commercial and residential development in areas well-suited to such development.

> *Policy 1.1: Encourage commercial and residential redevelopment in appropriate coastal zone areas.*

The Mid-Island area of Staten Island is already largely developed with residential and commercial uses and city zoning allows these types of uses. The proposed amended drainage plans would provide storm water management that would serve the existing development as well as the limited additional development that may occur in the watershed (limited because there are not many remaining developable parcels in any of the watersheds). The proposed completion of the sanitary sewer system would provide infrastructure for the proper collection and treatment of sanitary wastewater, and the proposed storm water sewers and BMPs would reduce flooding and improve water quality. In addition, the proposed project would enhance and preserve the wetlands of the watershed. It is, therefore, concluded that the proposed amended drainage plans are consistent with this policy.

> *Policy 1.2: Encourage non-industrial development that enlivens the waterfront and attracts the public.*

This policy does not apply as the proposed project would not encourage non-industrial development along the waterfront.

> *Policy 1.3: Encourage redevelopment in the coastal area where public facilities and infrastructure are adequate or will be developed.*

The proposed project would provide public infrastructure in the Mid-Island area, but would not initiate any waterfront redevelopment projects. Therefore, this policy does not apply.

Policy 2: Support water-dependent and industrial uses in New York City coastal areas that are well-suited to their continued operation.

Policy 2.1: Promote water-dependent and industrial uses in Significant Maritime and Industrial Areas.

The proposed amended drainage plans would not serve a Significant Maritime and Industrial Area (SMIA) and therefore this policy does not apply.

Policy 2.2: Encourage working waterfront uses at appropriate sites outside the Significant Maritime and Industrial Areas.

Much of the waterfront along the Mid-Island area is zoned for residential development or occupied by parkland. In addition, the proposed amended drainage plans would not affect working waterfront uses. Therefore, this policy does not apply.

Policy 2.3: Provide infrastructure improvements necessary to support working waterfront uses.

As stated above, there are no working waterfront uses in the Mid-Island area and this policy does not apply.

Policy 3: Promote use of New York City’s waterways for commercial and recreational boating and water-dependent transportation centers.

Policy 3.1: Support and encourage recreational and commercial boating in New York City's maritime centers.

The proposed amended drainage plans would not affect recreational and commercial boating opportunities in New York City's maritime centers, and this policy is not directly applicable. However, to the extent that the proposed project improves water quality and aquatic habitats this, in turn, encourages recreational and commercial boating. Thus, the proposed project is consistent with this policy.

Policy 3.2: Minimize conflicts between recreational, commercial, and ocean-going freight vessels.

The proposed amended drainage plans would not affect recreational, commercial, or ocean-going freight vessels. Therefore, this policy does not apply.

Policy 3.3: Minimize impact of commercial and recreational boating activities on the aquatic environment and surrounding land and water uses.

The proposed amended drainage plans would not affect commercial or recreational boating activities. This policy does not apply.

Policy 4: Protect and restore the quality and function of ecological systems within the New York City coastal area.

Policy 4.1: Protect and restore the ecological quality and component habitats and resources within the Special Natural Waterfront Areas, Recognized Ecological Complexes and Significant Coastal Fish and Wildlife Habitats.

There are no special natural waterfront areas recognized ecological complexes, or significant coastal fish and wildlife habitats in the watersheds.

However, the proposed amended drainage plans would preserve and enhance aquatic habitats and resources within the three Mid-Island watersheds. For example, the proposed amended drainage plans would preserve, enhance and restore freshwater wetlands while reducing the adverse impacts of uncontrolled flooding, erosion, and sedimentation. Overall, these impacts are positive and support the ecological complexes that comprise the Mid-Island area. Thus, the proposed project is consistent with this policy.

Policy 4.2: Protect and restore tidal and freshwater wetlands.

The freshwater wetlands of the study area would be protected by the Bluebelt project and the proposed amended drainage plan and its associated BMPs. Freshwater wetlands would be supported by the provision of storm water inputs and expansion of open water and emergent wetland habitats. In addition to the hydrologic support, wetlands would be enhanced through the proposed planting and restoration programs within each of the proposed BMPs.

In addition, velocity reduction and streambank stabilization would reduce streambank scouring and erosion, which reduces sedimentation and protects the wetlands of the watershed. The proposed project would also include a restoration plan for any outfalls that may impact tidal wetlands. Thus, the proposed project would be consistent with this policy.

Policy 4.3: Protect vulnerable plant, fish, and wildlife species, and rare ecological communities. Design and develop land and water uses to maximize their integration or compatibility with the identified ecological community.

There are protected vegetation and wildlife species that may be present at particular BMP sites within the watersheds. To avoid impacts to these species, mitigation measures would be implemented (see Chapter 8.1, “Mitigation”). With respect to protected wildlife resources, while there are a number that may use portions of the Mid-Island area for foraging or flyover (e.g., peregrine falcon), no nesting was observed at any of the BMP sites. In accordance with the proposed mitigation measures, prior to construction, pre-construction site investigations would be performed to the required BMP locations to avoid impacts to any protected wildlife species. Therefore, the proposed project is consistent with this policy.

Policy 4.4: Maintain and protect living aquatic resources.

Consistent with this policy, the proposed amended drainage plans, would improve water quality in local streams and ponds, thereby improving habitat for aquatic organisms in the Mid-Island area. It would also provide an overall improvement in the quality of wetland habitats and the associated aquatic resources. Therefore, the proposed project is consistent with this policy.

Policy 5: Protect and improve water quality in the New York City coastal area.

Policy 5.1: Manage direct or indirect discharges to waterbodies.

A principal goal of the proposed amended drainage plans is to manage stormwater runoff and the indirect discharges to waterbodies for the purposes of protecting and improving water quality. Consistent with this policy, under the proposed amended drainage plans, sanitary sewer service would be completed throughout the watersheds and storm water runoff that is currently unmanaged would be collected and managed with a comprehensively designed drainage plan in each watershed. Thus, with the proposed project, storm water would be directed into BMPs sized for the flows and conveyed through natural streams. Where required, streams would also be stabilized and protected to handle the flows. Therefore, it is concluded that the proposed amended drainage plans are consistent with this policy.

Policy 5.2: Protect the quality of New York City's waters by managing activities that generate non-point source pollution.

The proposed project would reduce the water quality impacts from existing non-point source pollution runoff in the watersheds. Through the implementation of BMPs, it is a project objective to minimize the release of nutrients, organics, sedimentation and other pollutants into coastal waters. Plantings at the proposed BMPs would preserve and enhance vegetation and natural habitats and would provide nutrient uptake as a way of reducing downstream nutrient loading. Therefore, the proposed project is consistent with this policy.

Policy 5.3: Protect water quality when excavating or placing fill in navigable waters and in or near marshes, estuaries, tidal marshes or wetlands.

As described in Chapter 6.1, "Impacts During Construction," comprehensive measures are proposed to minimize erosion and sedimentation during construction activities, which is expected to include excavation in and near navigable waters, freshwater, and tidal wetlands. With these protection measures and consistent with this policy, local water bodies, including ponds and streams as well as freshwater and tidal marshes and wetlands, would be protected construction-period impacts. Therefore, the proposed project is consistent with this policy.

Policy 5.4: Protect the quality and quantity of groundwater, streams, and the sources of water for wetlands.

Consistent with this policy, the proposed project would not adversely impact the quality of quantity of groundwater, streams, or sources of water for wetlands.

Policy 6: Minimize the loss of life, structures, and natural resources caused by flooding and erosion.

Policy 6.1: Minimize losses from flooding and erosion by employing non-structural and structural management measures appropriate to the condition and use of the property to be protected and the surrounding area.

Consistent with this policy, a principal objective of the proposed amended drainage plans is to minimize and reduce local flooding. Under the proposed plan, unmanaged storm water would be controlled with a comprehensively planned drainage system. In addition, non-structural measures, such as the BMPs, would be used to control flow velocities and volumes. Therefore, the proposed project is consistent with this policy.

Policy 6.2: Direct public funding for flood prevention or erosion control measures to those locations where the investment will yield significant public benefit.

Consistent with this policy, the proposed amended drainage plans would provide flood prevention in conjunction with the natural resources and open space benefits of the Bluebelt program. The use of existing streams and BMPs to control storm water has been successfully used in the South Richmond watersheds to the west and other locations in the City. In addition, this approach has been found to provide the best storm water management at the least cost with the greatest public benefit. Therefore, the proposed project is consistent with this policy.

Policy 6.3: Protect and preserve non-renewable sources of sand for beach nourishment.

No non-renewable sources of sand would be affected by the proposed project and therefore this policy does not apply.

Policy 7: Minimize environmental degradation from solid waste and hazardous substances.

Policy 7.1: Manage solid waste material, hazardous wastes, toxic pollutants, and substances hazardous to the environment to protect public health, control pollution and prevent degradation of coastal ecosystems.

No hazardous wastes or toxic pollutants would be generated by this project. Minimal solid waste is generated and would be hauled to out-of-state landfills. As described in this DEIS, all the watersheds have been analyzed for the potential for hazardous materials impacts. In all cases, potentially impacted soils would be handled and disposed of properly and the appropriate protection measures for workers and residents would be used. To this end, removal of these soils is a positive impact of the proposed project in that it would remove potential sources of contamination within the watersheds. Therefore, the proposed project is consistent with this policy.

Policy 7.2: Prevent and remediate discharge of petroleum products.

The proposed amended drainage plans would not involve the installation of facilities or use of petroleum products. However, as described above, areas of potential impact from hazardous materials have been identified. As part of the project implementation, construction activities in these areas would be performed in accordance with all applicable laws, rules, and regulations, and potential sources of contamination would also be removed from the watershed. Therefore, the proposed project would be consistent with the goals of this policy.

Policy 7.3: Transport solid waste and hazardous substances and site solid and hazardous waste facilities in a manner that minimizes potential degradation of coastal resources.

As stated above, no solid waste or use of hazardous substances is involved with the proposed project. Solid waste generated during construction would be hauled by a licensed waste hauler in accordance with all applicable laws and regulations. This would include recycling all metal, paper and plastic products as well as composting biodegradeable materials. No hazardous substances are expected to be generated; however, it is possible that certain areas of excavated materials may contain potentially hazardous materials. As stated above, these areas of potential impact have been identified as part of this EIS. Therefore, the proposed project is consistent with this policy.

Policy 8: Provide public access to and along New York City's coastal waters.

Policy 8.1: Preserve, protect and maintain existing physical, visual, and recreational access to the waterfront.

Consistent with this policy, the proposed amended drainage plans would not prevent or preclude public access to coastal waters at any location where public access is currently available. In addition, coastal parklands and natural areas would be enhanced and public access including physical, visual, and recreational access to the waterfront would be preserved. In addition, the water quality improvements of the proposed project indirectly improve the waterfront access experience for the public. Therefore, the proposed project is consistent with this policy.

Policy 8.2: Incorporate public access into new public and private development where compatible with proposed land use and coastal location.

The proposed amended drainage plans are consistent with this policy. The Bluebelt project has been developed with multiple objectives, including storm water management and natural resources protection. In addition, consistent with this policy, where the proposed amended drainage plans require activities in City parkland or state open spaces, impacted areas would be

restored and enhanced as natural features. Any existing trails that may be within the footprint a BMP would also be restored and integrated into the BMP design. Therefore, the proposed project is consistent with this policy.

Policy 8.3: Provide visual access to coastal lands, waters, and open space where physically practical.

The installation of sewers and the construction of the BMPs would not block visual access to the coastal lands and waters. As stated above, consistent with this policy, Bluebelt properties provide a visual public access benefit and open views to coastal water bodies and natural features. Therefore, the proposed project is consistent with this policy.

Policy 8.4: Preserve and develop waterfront open space and recreation on publicly owned land at suitable locations.

Consistent with this policy, all publicly owned land would be preserved under the proposed amended drainage plans. The proposed amended drainage plans would also enhance the water quality and natural features of the coastal open spaces, thereby enhancing the waterfront open space and recreational experience. Therefore, the proposed project is consistent with this policy.

Policy 8.5: Preserve the public interest in and use of lands and waters held in public trust by the state and city.

Under the proposed project, consistent with this policy, all lands held by New York City and State would remain in public ownership. Therefore, the proposed project is consistent with this policy.

Policy 9: Protect scenic resources that contribute to the visual quality of the New York City coastal area.

Policy 9.1: Protect and improve visual quality associated with New York City's urban context and the historic and working waterfront.

The proposed amended drainage plans and BMPs are not located in areas associated with the City/historic working waterfront. Therefore, this policy does not apply.

Policy 9.2: Protect scenic values associated with natural resources.

As stated above, visual impact analyses were completed for each watershed. Overall, positive impacts are expected with the planting programs proposed at the BMPs. This would include greater habitat diversity and landscapes of open water and flowering emergent wetland plants. In addition, the proposed BMPs are expected to expand wildlife attractors at each of the sites, which would also positively contribute to the natural aesthetic of the sites. Therefore, it is concluded that the proposed project is consistent with this policy.

Policy 10: Protect, preserve, and enhance resources significant to the historical, archaeological, and cultural legacy of the New York City coastal area.

Policy 10.1: Retain and preserve designated historic resources and enhance resources significant to the coastal culture of New York City.

Consistent with this policy the proposed project would not adversely impact any historic resources significant to the coastal culture of New York City.

Policy 10.2: Protect and preserve archaeological resources and artifacts.

Consistent with this policy, a complete archaeological investigation was undertaken for each of the watersheds. In certain areas, potential impacts were identified based on the potential for presence of prehistoric archaeological resources for these impacts is presented. In these areas a Phase 1B investigation would be performed as part of project implementation in order to avoid any impacts on these resources.

For Internal Use Only:	WRP no._____
Date Received:_____	DOS no._____

NEW YORK CITY WATERFRONT REVITALIZATION PROGRAM
Consistency Assessment Form

Proposed action subject to CEQR, ULURP, or other Local, State or Federal Agency Discretionary Actions that are situated within New York City's designated Coastal Zone Boundary must be reviewed and assessed for their consistency with the *New York City Waterfront Revitalization Program (WRP)*. The WRP was adopted as a 197-a Plan by the Council of the City of New York on October 13, 1999, and approved in coordination with local, state and Federal laws and regulations, including the State's Coastal Management Program (Executive Law, Article 42) and the Federal Coastal Zone Management Act of 1972 (P.L. 92-583). As a result of these approvals, state and federal discretionary actions within the city's coastal zone must be consistent to the maximum extent practicable with the WRP policies and the city must be given the opportunity to comment on all state and federal projects within its coastal zone.

This form is intended to assist an applicant in certifying that the proposed activity is consistent with the WRP. It should be completed when the local, state, or federal application is prepared. The completed form and accompanying information will be used by the New York State Department of State, other State Agency or the New York City Department of City Planning in its review of the applicant's certification of consistency.

A. APPLICANT

1. Name: **James Garin**

Address: **59-17 Junction Blvd, Flushing, NY 11373**

3. Telephone: **(718) 595-5501** Fax:

E-mail Address:

4. Project site owner: **City of New York**

B. PROPOSED ACTIVITY

1. Brief description of activity: **The proposed project involves the installation of a completed sewer system, with Best Management Practices (BMPs) and new outfalls in the Mid-Island area of Staten Island.**

2. Purpose of activity: **The proposed storm sewer collection system, BMPs and the outfalls are necessary to improve drainage and to reduce flooding in the local watersheds.**

3. Location of activity: **The area of the proposed action is the Mid Island area of Staten Island**
Borough: **Staten Island**

Street Address or Site Description: **See above.**

Proposed Activity Cont'd

4. If a federal or state permit or license was issued or is required for the proposed activity, identify the permit type(s), the authorizing agency and provide the application or permit number(s), if known: **New York State Department of Environmental Conservation (NYSDEC) 401 Water Quality Certification, NYSDEC Freshwater Wetlands Permit, NYSDEC Tidal Wetlands Permit, NYSDEC State Pollution Discharge Elimination System (SPDES) permit for new outfalls, SPDES General Permit for activities during construction; USACE Section 404, and Section 10 permits**

5. Is federal or state funding being used to finance the project? If so, please identify the funding source(s). **No**

		Yes	No
6.	Will the proposed project result in any large physical change to a site within the coastal area that will require the preparation of an environmental impact statement?		
	If yes, identify Lead Agency:	✓	
	New York City Department of Environmental Protection		

7. Identify City discretionary actions, such as zoning amendment or adoption of an urban renewal plan, required for the proposed project.
The proposed capital project would be a discretionary action undertaken by the New York City Department of Environmental Protection.

C. COASTAL ASSESSMENT

The following questions represent, in a broad sense, the policy of the WRP. The number in the parentheses after each question indicated the policy or policies that are the focus of the question. A detailed explanation of the Waterfront Revitalization Program and its policies are contained in the publication the *New York City Waterfront Revitalization Program.*

Check either "Yes" or "No" for each of the following questions. Once the checklist is completed, assess how the proposed project affects the policy or standards indicated in "( )" after each question with a Yes response. Explain how the action is consistent with the goals of the policy or standard.

Location Questions:		Yes	No
1.	Is the project site on the waterfront or at the water's edge?	✓	
2.	Does the proposed project require a waterfront site?	✓	
3.	Would the action result in a physical alteration to a waterfront site, including land along the shoreline, land underwater, or coastal waters?	✓	

Policy Questions:		Yes	No
	The following questions represent, in a broad sense, the policies of the WRP. Numbers in parentheses after each questions indicate the policy or policies addressed by the question. The new Waterfront Revitalization Program offers detailed explanations of the policies, including criteria for consistency determinations.		
	Check either "Yes" or "No" for each of the following questions. For all "yes" responses, provide an attachment assessing the effects of the proposed activity on the relevant policies or standards. Explain how the action would be consistent with the goals of those policies and standards.		
4.	Will the proposed project result in revitalization or redevelopment of a deteriorated or under- used waterfront site? (1)		✓
5.	Is the project site appropriate for residential or commercial redevelopment? (1.1)		✓
6.	Will the action result in a change in scale or character of a neighborhood? (1.2)		✓
7.	Will the proposed activity require provision of new public services or infrastructure in undeveloped or sparsely populated sections of the coastal area? (1.3)		✓

Policy Questions cont'd:		Yes	No
8.	Is the action located in one of the designated Significant Maritime and Industrial Areas (SMIA): South Bronx, Newtown Creek, Brooklyn Navy Yard, Red Hook, Sunset Park, or Staten Island? (2)		✓
9.	Are there any waterfront structures, such as piers, docks, bulkheads or wharves, located on the project sites? (2)		✓
10.	Would the action involve the siting or construction of a facility essential to the generation or transmission of energy, or a natural gas facility, or would it develop new energy resources? (2.1)		✓
11.	Does the action involve the siting of a working waterfront use outside of a SMIA? (2.2)		✓
12.	Does the proposed project involve infrastructure improvement, such as construction or repair of piers, docks, or bulkheads? (2.3, 3.2)	✓	
13.	Would the action involve mining, dredging, or dredge disposal, or placement of dredged or fill materials in coastal waters? (2.3, 3.1, 4, 5.3, 6.3)	✓	
14.	Would the action be located in a commercial or recreational boating center, such as City Island, Sheepshead Bay or Great Kills or an area devoted to water-dependent transportation? (3)		✓
15.	Would the proposed project have an adverse effect upon the land or water uses within a commercial or recreation boating center or water-dependent transportation center? (3.1)		✓
16.	Would the proposed project create any conflicts between commercial and recreational boating? (3.2)		✓
17.	Does the proposed project involve any boating activity that would have an impact on the aquatic environment or surrounding land and water uses? (3.3)		✓
18.	Is the action located in one of the designated Special Natural Waterfront Areas (SNWA): Long Island Sound-East River, Jamaica Bay, or Northwest Staten Island? (4 and 9.2)		✓
19.	Is the project site in or adjacent to a Significant Coastal Fish and Wildlife Habitats? (4.1)		✓
20.	Is the site located within or adjacent to a Recognized Ecological Complex: South Shore of Staten Island or Riverdale Natural Area District? (4.1and 9.2)		✓
21.	Would the action involve any activity in or near a tidal or freshwater wetland? (4.2)	✓	
22.	Does the project site contain a rare ecological community or would the proposed project affect a vulnerable plant, fish, or wildlife species? (4.3)	✓	
23.	Would the action have any effects on commercial or recreational use of fish resources? (4.4)		✓
24.	Would the proposed project in any way affect the water quality classification of nearby waters or be unable to be consistent with that classification? (5)		✓
25.	Would the action result in any direct or indirect discharges, including toxins, hazardous substances, or other pollutants, effluent, or waste, into any waterbody? (5.1)		✓
26.	Would the action result in the draining of stormwater runoff or sewer overflows into coastal waters? (5.1)	✓	
27.	Will any activity associated with the project generate nonpoint source pollution? (5.2)	✓	

Policy Questions cont'd:		Yes	No
28.	Would the action cause violations of the National or State air quality standards? (5.2)		✓
29.	Would the action result in significant amounts of acid rain precursors (nitrates and sulfates)? (5.2C)		✓
30.	Will the project involve the excavation or placing of fill in or near navigable waters, marshes, estuaries, tidal marshes or other wetlands? (5.3)	✓	
31.	Would the proposed action have any effects on surface or ground water supplies? (5.4)		✓
32.	Would the action result in any activities within a Federally designated flood hazard area or State designated erosion hazards area? (6)	✓	
33.	Would the action result in any construction activities that would lead to erosion? (6)	✓	
34.	Would the action involve construction or reconstruction of flood or erosion control structure? (6.1)	✓	
35.	Would the action involve any new or increased activity on or near any beach, dune, barrier island, or bluff? (6.1)	✓	
36.	Does the proposed project involve use of public funds for flood prevention or erosion control? (6.2)	✓	
37.	Would the proposed project affect a non-renewable source of sand? (6.3)		✓
38.	Would the action result in shipping, handling, or storing of solid wastes; hazardous materials, or other pollutants? (7)		✓
39.	Would the action affect any sites that have been used as landfills? (7.1)		✓
40.	Would the action result in development of a site that may contain contamination or has a history of underground fuel tanks, oil spills, or other form or petroleum product use or storage? (7.2)		✓
41.	Will the proposed activity result in any transport, storage, treatment, or disposal of solid wastes or hazardous materials, or the siting of a solid or hazardous waste facility? (7.3)		✓
42.	Would the action result in a reduction of existing or required access to or along coastal waters, public access areas, or public parks or open spaces? (8)		✓
43.	Will the proposed project affect or be located in, on, or adjacent to any federal, state, or city park or other land in public ownership protected for open space preservation? (8)	✓	
44.	Would the action result in the provision of open space without the provision for its maintenance? (8.1)		✓
45.	Would the action result in any development along the shoreline but NOT include new water enhanced or water dependent recreational space? (8.2)	✓	
46.	Will the proposed project impede visual access to coastal lands, waters and open space? (8.3)		✓

Policy Questions cont'd:

		Yes	No
47.	Does the proposed project involve publically owned or acquired land that could accommodate waterfront open space or recreation? (8.4)	✓	
48.	Does the project site involve lands or waters held in public trust by the state or city? (8.5)	✓	
49.	Would the action affect natural or built resources that contribute to the scenic quality of a coastal area? (9)	✓	
50.	Does the site currently include elements that degrade the area's scenic quality or block views to the water? (9.1)		✓
51.	Would the proposed action have a significant adverse impact on historic, archeological, or cultural resources? (10)		✓
52.	Will the proposed activity affect or be located in, on, or adjacent to an historic resource listed on the National or State Register of Historic Places, or designated as a landmark by the City of New York? (10)		✓

D. CERTIFICATION

The applicant must certify that the proposed activity is consistent with New York City's Waterfront Revitalization Program, pursuant to the New York State Coastal Management Program. If this certification cannot be made, the proposed activity shall not be undertaken. If the certification can be made, complete this section.

"The proposed activity complies with New York State's Coastal Management Program as expressed in New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program, and will be conducted in a manner consistent with such program."

Applicant/Agent Name: Dana Gumb, Chief, Staten Island Bluebelt Unit

Address: 59-17 Junction Blvd, Flushing, NY 11373

Telephone (718) 595-5501

Applicant/Agent Signature: Dana Gumb Date: 9/26/11