

New York State Department of Environmental Conservation**Division of Environmental Permits, Region 2**47-40 21ST Street, Long Island City, NY 11101-5407

Phone: (718) 482-4997 • FAX: (718) 482-4975

Website: www.dec.state.ny.us

Alexander B. Grannis
Commissioner

July 15, 2009

Jaclyn A. Brilling
Secretary
NYS Public Service Commission
3 Empire State Plaza
Albany, N.Y. 12223-1350

RE: Consolidated Edison Company of New York, Inc.
Hudson Avenue Replacement Project
Lead Agency Coordination

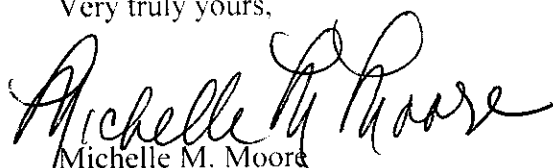
Dear Ms. Brilling:

Enclosed is a Long Environmental Assessment Form prepared by Consolidated Edison Company for the Hudson Avenue Replacement Project located at Marshall Street and Hudson Avenue, Brooklyn, NY 11201. The project involves the replacement of the existing steam generating facility. A new steam generating facility will be located on approximately 1.14 acres (49,860 square feet) of the station property, Tax Block 5 lot 1 in Kings County.

Consistent with the provisions of the State Environmental Review Act (SEQRA), the NYS Department of Environmental Conservation (DEC) has determined that the proposed action does not meet the definition of Type I or Type II action contained in 6NYCRR Part 617.4 and 617.5 and is therefore classified as Unlisted. The DEC proposes to designate itself as lead agency for the purposes of conducting a coordinated environmental review. Please review the enclosed project information and advise the DEC by close of business August 17, 2009 whether or not your agency has discretionary regulatory jurisdiction for the proposed action. A non response to this notice will be interpreted as your agency having no interest in or objections to the DEC serving as lead agency for the proposed action.

If you have any questions or wish to discuss the matter further, please call me at (718) 482-4997.

Very truly yours,


Michelle M. Moore
Environmental Analyst

Enclosure

Lead Agency Coordination Distribution:

Alan Bauder, NYS Office of General Services

Jaclyn Brillling, NYS Public Service Commission

Amanda M. Burden, AICP, NYC Department of City Planning

Robert Kulikowski, NYC Mayor's Office of Environmental Coordination

Steven Resler, NYS Department of State

cc: Floyd Barwag, NYS Public Service Commission, OEEE

Jeffery Riback, Consolidate Edison Company

JUN 01 2009

DIVISION OF
ENVIRONMENTAL PERMITS

**617.20
Appendix A
State Environmental Quality Review
FULL ENVIRONMENTAL ASSESSMENT FORM**

Purpose: The full EAF is designed to help applicants and agencies determine, in an orderly manner, whether a project or action may be significant. The question of whether an action may be significant is not always easy to answer. Frequently, there are aspects of a project that are subjective or unmeasurable. It is also understood that those who determine significance may have little or no formal knowledge of the environment or may not be technically expert in environmental analysis. In addition, many who have knowledge in one particular area may not be aware of the broader concerns affecting the question of significance.

The full EAF is intended to provide a method whereby applicants and agencies can be assured that the determination process has been orderly, comprehensive in nature, yet flexible enough to allow introduction of information to fit a project or action.

Full EAF Components: The full EAF is comprised of three parts:

- Part 1:** Provides objective data and information about a given project and its site. By identifying basic project data, it assists a reviewer in the analysis that takes place in Parts 2 and 3.
- Part 2:** Focuses on identifying the range of possible impacts that may occur from a project or action. It provides guidance as to whether an impact is likely to be considered small to moderate or whether it is a potentially-large impact. The form also identifies whether an impact can be mitigated or reduced.
- Part 3:** If any impact in Part 2 is identified as potentially-large, then Part 3 is used to evaluate whether or not the impact is actually important.

DETERMINATION OF SIGNIFICANCE – Type 1 and Unlisted Actions

Identify the Portions of EAF completed for this project:

☒ Part 1 ☐ Part 2 ☐ Part 3

Upon review of the information recorded on this EAF (Parts 1 and 2 and 3 if appropriate), and any other supporting information, and considering both the magnitude and importance of each impact, it is reasonably determined by the lead agency that:

- ☐ A. The project will not result in any large and important impact(s) and, therefore, is one which **will not** have a significant impact on the environment, therefore a **negative declaration will be prepared**.
- ☐ B. Although the project could have a significant effect on the environment, there will not be a significant effect for this Unlisted Action because the mitigation measures described in PART 3 have been required, therefore a **CONDITIONED negative declaration will be prepared.***
- ☐ C. The project may result in one or more large and important impacts that may have a significant impact on the environment, therefore a **positive declaration will be prepared**.

*A Conditioned Negative Declaration is only valid for Unlisted Actions

Hudson Avenue Replacement Project

Name of Action

New York State Department of Environmental Conservation

Name of Lead Agency

Print or Type Name of Responsible Officer in Lead Agency

Title of Responsible Officer

Signature of Responsible Officer in Lead Agency

Signature of Preparer (if different from responsible officer)

Date

PART 1--PROJECT INFORMATION

Prepared by Project Sponsor

NOTICE: This document is designed to assist in determining whether the action proposed may have a significant effect on the environment. Please complete the entire form, Parts A through E. Answers to these questions will be considered as part of the application for approval and may be subject to further verification and public review. Provide any additional information you believe will be needed to complete Parts 2 and 3.

It is expected that completion of the full EAF will be dependent on information currently available and will not involve new studies, research or investigation. If information requiring such additional work is unavailable, so indicate and specify each instance.

Name of Action Hudson Avenue Replacement Project		
Location of Action (include Street Address, Municipality and County) Consolidated Edison Company of New York, Inc.'s ("Con Edison") existing Hudson Avenue Generating Station, located at the intersection of Marshall Street and Hudson Avenue, Brooklyn, New York (see Figures 1 and 2)		
Name of Applicant/Sponsor Consolidated Edison Company of New York, Inc.	Business Telephone (212) 460-6677	
Address 4 Irving Place		
City/PO New York	State NY	Zip Code 10003
Name of Owner(if different) Same as Above Contact Person: Jeffrey L. Riback, Assistant General Counsel		Business Telephone (212) 460-6677
Address Same as above		
City/PO	State	Zip Code:
Description of Action <p>Consolidated Edison Company of New York, Inc. (Con Edison) is proposing to install a new steam generating facility to fully replace the existing steam facility at Con Edison's Hudson Avenue Generating Station in Brooklyn, NY. The Hudson Avenue Generating Station consists of three parcels of land encompassing approximately 13 acres and is identified in tax records as Block 5, Lot 1; Block 6, Lot 1; and Block 12, Lot 1. The new steam generating facility will be located on approximately 1.14 acres (49,860 square feet) of station property located within Block 5, Lot 1 (see preliminary Facility Plot Plan, preliminary Project Site Boundary Area Plan and preliminary Site Plan included as Figures 3a, 3b, and 3c, respectively).</p> <p>Con Edison's preliminary design concept for the project is to replicate the current steam generating capacity of the existing four low pressure (LP) boilers (Nos. 71, 72, 81 and 82) at the Hudson Avenue Generating Station with four new package boilers with a combined net steam send out of up to approximately 1,600,000 lb/hr. The existing LP boilers will be retired in place after the installation of the new boilers. There is no associated electric power generation under the proposed action.</p> <p>The Hudson Avenue Generating Station currently generates and provides up to approximately 1,600,000 lb/hr of steam to the Con Edison steam system from the four LP natural circulation, balanced draft, non-reheat boilers. Each of the four boilers has a net steam output of up to approximately 400,000 lb/hr at 360 psig pressure. The LP boilers are fired by 0.3% sulfur No. 6 fuel oil and No. 2 fuel oil for ignition.</p> <p>The four new shop-assembled packaged boilers will be dual-fuel type (natural gas as the main fuel with ultra-low sulfur distillate as the back-up fuel) and will be equipped with Selective Catalytic Reduction (SCR) and carbon monoxide and VOC catalyst systems for emission control. The new units will be installed in a new building to be located in the area currently occupied by the Maintenance and Storage Building and adjacent yard, which is located immediately west of Hudson Avenue approximately 160 feet north of the intersection of Hudson Avenue and John Street.</p>		

Path Name: N:\Projects\163230 - Hudson Avenue (Con Ed)\1110 - Phase I ESA\Figures\TRC Working Drawings\FIG01 SITE LOCATION MAP.dwg - Date/Time: Mon, 16 Mar 2009 - 12:29pm - User Name: hdpdgo - Layout: Title (A3) (JT)



SCALE 1:24,000

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

0 1 2 3 4 5 KILOMETER

CONTOUR INTERVAL 10 FEET

NATIONAL GEODETIC VERTICAL DATUM OF 1929

BROOKLYN, N. Y.

N4032 S. W7352.5/7.5


1967

PHOTOREVISED 1970

ANS 6251.10 NW-SERIES V401

QUADRANGLE LOCATION

MAP OBTAINED THROUGH USE OF MAPTECH TERRAIN NAVIGATOR PRO SOFTWARE

 <p>TRC 1430 BROADWAY, 10TH FLOOR NEW YORK, NEW YORK 10018 212-221-7822</p>	DESIGNED BY: HD	<p>CON EDISON HUDSON AVENUE REPLACEMENT PROJECT PHASE I ESA BROOKLYN, NEW YORK 11201</p> <p>DRAWING TITLE SITE LOCATION MAP</p>	<p>FIGURE 1</p>
	DRAWN BY: HD		
	CHECKED BY: AH		
	DATE: MARCH 2009		
	SCALE: AS SHOWN		
	PROJECT NUMBER: 163230.0000.0000		



**Consolidated Edison Company of New York, Inc.
Hudson Avenue Replacement Project
Brooklyn, New York**

**Figure 2: Hudson Avenue Generating Station –
Site Aerial Photograph**

Photo Source: Con Edison



RECEIVED
N.Y.S. D.E.C. - REGION 2

JUN 01 2009

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ENVIRONMENTAL PERMITS

NOTE:
PRELIMINARY ISSUE
LOCATIONS SHOWN ARE SUBJECT TO
SITE SURVEY AND GEOTECHNICAL
INVESTIGATION

GRAPHIC SCALE
0 20 50 100 150 200
1"=100'-0"

NOT FOR CONSTRUCTION

R:\CON EDISON\CONED HUDSON\REPLACEMENT PROJECT\GA_Mech\QA's and Site Plan\SK-M-0001_A.dwg
May 28, 2009 11:23:31pm

CONTRACTOR SHALL VERIFY ALL CONDITIONS
ON JOB SITE. ANY PROJECT ENGINEER
OF ANY FIRM SHALL BE RESPONSIBLE FOR
OR THESE DRAWINGS BEFORE PROCEEDING
WITH ANY CONSTRUCTION.

NOTICE
The data in this document represents proprietary rights of
SIGMA ENERGY SOLUTIONS.
Any party accepting this document does so in confidence and agrees
that it shall not be disclosed in whole or in part, nor distributed to others
without the consent of SIGMA ENERGY SOLUTIONS.

PROJECT ENGINEER

C. SAMPATHKUMAR

ENGINEER

F. GENCINA

DATE

5/07/09

SCALE

1"=100'-0"

DRAWN

J. RUNGON

CHECKED

F. GENCINA

APPROVED

R. MATTHEWS

APPROVED

T. SWEENEY



One Huntington Quadrangle Suite 4500
Manhasset, NY 11762

CON EDISON
HUDSON AVENUE GENERATING STATION
BRONX, NY

HUDSON AVE. REPLACEMENT PROJECT
FACILITY PLOT PLAN

SK-M-0001

1 OF 1

Please Complete Each Question--Indicate N.A. if not applicable

A. Site Description

Physical setting of overall project, both developed and undeveloped areas.

1. Present land use: ☐ Urban ☒ Industrial ☐ Commercial ☐ Residential (suburban) ☐ Rural(non-farm)
☐ Forest ☐ Agriculture ☐ Other

2. Total acreage of project area: Installation of the proposed steam generating facility would result in the disturbance of approximately 1.14 acres of the approximately 13-acre Hudson Avenue Generating Station. Disturbance within the 1.14-acre development area is defined below:

APPROXIMATE ACREAGE	PRESENTLY	AFTER COMPLETION
Meadow or Brushland (Non-agricultural)	<u>0</u> acres	<u>0</u> acres
Forested	<u>0</u> acres	<u>0</u> acres
Agricultural (Includes orchards, cropland, pasture, etc.)	<u>0</u> acres	<u>0</u> acres
Wetland(Freshwater or tidal as per Articles 24,25 of ECL)	<u>0</u> acres	<u>0</u> acres
Water Surface Area	<u>0</u> acres	<u>0</u> acres
Unvegetated (Rock, earth or fill)	<u>0</u> acres	<u>0</u> acres
Roads, buildings and other paved surfaces	<u>1.14</u> acres	<u>1.14</u> acres
Other (Indicate type)	<u>0</u> acres	<u>0</u> acres

(Note: an additional 2.9 acres of paved surfaces at the Hudson Avenue Generating Station will be used for staging, laydown, and storage during construction.)

3. What is predominant soil type(s) on project site? Urban land – uncontrolled fill materials generally consisting of varying combinations of sand, gravel, and debris (wood, brick, concrete, etc.)
- a. Soil drainage: ☒ Well drained 100 % of site ☐ Moderately well drained _____ % of site
☐ Poorly drained _____ % of site
- b. If any agricultural land is involved, how many acres of soil are classified within soil group 1 through 4 of the NYS Land Classification System? _____ acres (See 1 NYCRR 370). N.A.
4. Are there bedrock outcroppings on project site? ☐ Yes ☒ No
a. What is depth to bedrock? Approx. 75 to 115 feet below ground surface (in feet)
5. Approximate percentage of proposed project site with slopes: ☒ 0-10% 100 % ☐ 10-15% _____ %
☐ 15% or greater _____ %
6. Is project substantially contiguous to, or contain a building, site, or district, listed on the State or the National Registers of Historic Places? ☐ Yes ☒ No The proposed location of the new steam generating facility is not adjacent to any designated historic building, site, or district. The New York City "Vinegar Hill Historic District" and "Dumbo Historic District" is located approximately 0.1 miles south and 0.18 miles southwest of the project site, respectively.
7. Is project substantially contiguous to a site listed on the Register of National Natural Landmarks? ☐ Yes ☒ No
8. What is the depth of the water table? 2 to 10 feet across entire Hudson Avenue Generating Station property (in feet)
9. Is site located over a primary, principal, or sole source aquifer? ☒ Yes ☐ No The site is located over the Brooklyn - Queens Aquifer System
10. Do hunting, fishing or shell fishing opportunities presently exist in the project area? ☐ Yes ☒ No The Hudson Generating Station's East River waterfront has been dedicated to industrial and utility use for over 80 years.
11. Does project site contain any species of plant or animal life that is identified as threatened or endangered?
☐ Yes ☒ No According to site reconnaissance by TRC Environmental in Spring 2009. The 1.14-acre project site is currently developed and located within an existing 13-acre industrial site that has been used for the generation of steam and electricity for over 80 years.

Identify each species _____

12. Are there any unique or unusual land forms on the project site?(i.e., cliffs, dunes, other geological formations)
☐Yes ☒No Describe The 1.14-acre project site is currently developed and located within an existing 13-acre industrial site that has been used for the generation of steam and electricity for over 80 years.
13. Is the project site presently used by the community or neighborhood as an open space or recreation area?
☐Yes ☒No If yes, explain.
14. Does the present site include scenic views known to be important to the community?
☐Yes ☒No As an existing industrial waterfront property, the Hudson Avenue Generating Station is afforded views across the East River towards lower Manhattan.
15. Streams within or contiguous to project area: The site is located on the southern shoreline of the East River, near the Brooklyn Navy Yard.
a. Name of Stream and name of River to which it is tributary East River/New York Harbor.
16. Lakes, ponds, wetland areas within or contiguous to project area: NYSDEC Tidal Wetlands are designated along the Hudson Generating Station's East River waterfront
a. Name N.A. b. Size (In acres) N.A.
17. Is the site served by existing public utilities? ☒Yes ☐No Site is served by electric, gas, potable water, and sanitary sewer connections.
a) If Yes, does sufficient capacity exist to allow connection? ☐Yes ☒No Additional gas service will be required at the site to support operation of the replacement boilers.
b) If Yes, will improvements be necessary to allow connection? ☒Yes ☐No
18. Is the site located in an agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? ☐Yes ☒No
19. Is the site located in or substantially contiguous to a Critical Environmental Area designated pursuant to Article 8 of the ECL, and 6 NYCRR 617? ☐Yes ☒No
20. Has the site ever been used for the disposal of solid or hazardous wastes?☐Yes ☒No

B. Project Description

1. Physical dimensions and scale of project (fill in dimensions as appropriate)
- Total contiguous acreage owned or controlled by project sponsor approx. 13 acres.
 - Project acreage to be developed: 1.14* acres initially; 1.14 acres ultimately.
* An additional 2.9 acres will be utilized for staging, laydown, and storage during construction.
 - Project acreage to remain undeveloped N/A acres. The 13-acre Hudson Generating Station is currently built out.
 - Length of project, in miles: N.A. (if appropriate).
 - If the project is an expansion, indicate percent of expansion proposed N.A. %
 - Number of off-street parking spaces existing 0; proposed: 1 – truck unloading area. There are no designated off-street parking spaces currently located within the site development area. One new truck unloading area is proposed to support operation of the new steam generating facility. Existing Site parking that supports current station operations will support the new steam generating facility.
 - Maximum vehicular trips generated per hour: approx. 30 vehicle peak hour trips including operational employees and station deliveries (upon completion of project).
 - If residential, Number and type of housing units: N.A.
- | | One Family | Two Family | Multiple Family | Condominium |
|------------|------------|------------|-----------------|-------------|
| Initially | | | | |
| Ultimately | | | | |
- Dimensions (in feet) of largest proposed structure 80' height; 126' width; 191' length. Steam Generator Building. Height of the proposed steam generating facility's stack to be determined based upon the results of final air quality modeling and permitting.)
 - Linear feet of frontage along a public thoroughfare project will occupy is? N/A. The proposed steam generating facility will be located within the Hudson Avenue Generating Station site.

2. How much natural material (i.e., rock, earth, etc.) will be removed from the site? N/A tons/cubic yards. The project intends to have a balance of cut and fill. If excavated soil is determined not to be suitable for reuse, it will be disposed of by a licensed contractor at a facility licensed to accept such material in accordance with applicable laws.
3. Will disturbed areas be reclaimed? ☐ Yes ☒ No
- a. If yes, for what intended purpose is the site being reclaimed?
- b. Will topsoil be stockpiled for reclamation? ☐ Yes ☒ No
- c. Will upper subsoil be stockpiled for reclamation? ☐ Yes ☒ No
4. How many acres of vegetation (trees, shrubs, ground covers) will be removed from site? None. The 1.14-acre project site is currently developed and located within an existing 13-acre industrial site that has been used for the generation of steam and electricity for over 80 years
5. Will any mature forest (over 100 years old) or other locally-important vegetation be removed by this project?
☐ Yes ☒ No
6. If single phase project: Anticipated period of construction 36 months, (including demolition).
7. If multi-phased: N.A.
- a. Total number of phases anticipated _____ (number).
- b. Anticipated date of commencement phase 1 _____ month _____ year, (including demolition).
- c. Approximate completion date of final phase _____ month _____ year.
- d. Is phase 1 functionally dependent on subsequent phases? ☐ Yes ☐ No
8. Will blasting occur during construction? ☐ Yes ☒ No
9. Number of jobs generated: during construction? Approx. 250 during peak construction; after project is complete? 0.
10. Number of jobs eliminated by this project? 0.
11. Will project require relocation of any projects or facilities? ☐ Yes ☒ No If yes, explain No off-site utility relocations are anticipated to be required.
12. Is surface liquid waste disposal involved? ☒ Yes ☐ No
- a. If yes, indicate type of waste (sewage, industrial, etc.) and amount. The Hudson Avenue Generating Station discharges process wastewater to the East River in accordance with the terms and conditions of a State Pollutant Discharge Elimination System permit ("SPDES") issued by the NYSDEC. This permit would have to be modified to reflect wastewater to be generated from the proposed project, including but not necessarily limited to, site stormwater runoff, boiler blowdown, demineralization regeneration water, sample drains and treated effluent from on-site oil/water separators used for the proper management of building floor drains.
- b. Name of water body into which effluent will be discharged: East River
13. Is subsurface liquid waste disposal involved? ☐ Yes ☒ No Type _____
14. Will surface area of an existing water body increase or decrease by proposal? ☐ Yes ☒ No
Explain _____
15. Is project, or any portion of project, located in a 100 year flood plain? ☒ Yes ☐ No A small portion of the proposed project site is located within the FEMA-designated 100-year floodplain. The majority of the project site is located within the FEMA-designated 500-year floodplain.
16. Will the project generate solid waste? ☒ Yes ☐ No
- a. If yes, what is the amount per month? Less than 80 cubic yards per month of operational refuse tons.
- b. If yes, will an existing solid waste facility be used? ☒ Yes ☐ No
- c. If yes, give name: Private haulers would transport operational waste to a licensed facility; location TBD
- d. Will any wastes not go into a sewage disposal system or into a sanitary landfill? ☒ Yes ☐ No
- e. If Yes, explain Certain process wastes (e.g., periodic boiler washwaters, oil and grease from oil-water separator) would be disposed by a private contractor at an approved disposal facility.
17. Will the project involve the disposal of solid waste? ☐ Yes ☒ No
- a. If yes, what is the anticipated rate of disposal? _____ tons/month.
- b. If yes, what is the anticipated site life? _____ years.
18. Will project use herbicides or pesticides? ☐ Yes ☒ No
19. Will project routinely produce odors (more than one hour per day)? ☐ Yes ☒ No

Federal Agencies

☒ Yes ☐ No

Prevention of Significant Deterioration

Permit (USEPA)

US Army Corp - Section 10 of the

Rivers and Harbors Act (only if

waterfront improvements proposed)

FAA Determination of No Hazard to

Navigation for New Stack

C. ZONING and PLANNING INFORMATION

1. Does proposed action involve a planning or zoning decision? ☒ Yes ☐ No

If Yes, indicate decision required:

☐ zoning amendment

☐ zoning variance ☒ special use permit

☐ subdivision

☒ site plan

☐ new/revision of master plan

☐ resource management plan

☒ other Coastal Zone Consistency Determination

2. What is the zoning classification(s) of the site? M3-1, Heavy Manufacturing District per the 2001 NYC Zoning Resolution
3. What is the maximum potential development of the site if developed as permitted by the present zoning?
Based on the M3-1, Heavy Manufacturing District's maximum permitted Floor Area Ratio of 2.0 and 49,860 square foot project site, approximately 99,720 square feet of heavy industrial floor space could be developed within the project's site development area.
4. What is the proposed zoning of the site? Same as existing
5. What is the maximum potential development of the site if developed as permitted by the proposed zoning?
See # 3 above.
6. Is the proposed action consistent with the recommended uses in adopted local land use plans? ☒ Yes ☐ No The proposed steam generating facility is an "allowable use" within the M3-1 Heavy Manufacturing District.
7. What are the predominant land use(s) and zoning classifications within a 1/4 mile radius of proposed action?
Land Use: Heavy and Light Industrial and Residential
Zoning: M3-1, Heavy Manufacturing District; M1-2, M1-5 Manufacturing Districts; and R6A, R6B, and R8A General Residence Districts.
8. Is the proposed action compatible with adjoining/surrounding land uses within a 1/4 mile? ☒ Yes ☐ No The proposed steam generating facility would be constructed within the existing 13-acre Hudson Avenue Generating Station, a site which has been used for the generation of steam and electricity for over 80 years.
9. If the proposed action is the subdivision of land, how many lots are proposed? NA
- a. What is the minimum lot size proposed? N.A.
10. Will proposed action require any authorization(s) for the formation of sewer or water districts? ☐ Yes ☒ No
11. Will the proposed action create a demand for any community provided services (recreation, education, police, fire protection)? ☐ Yes ☒ No
- a. If yes, is existing capacity sufficient to handle projected demand? ☐ Yes ☐ No
12. Will the proposed action result in the generation of traffic significantly above present levels? ☐ Yes ☒ No Operational traffic will be similar to existing traffic volumes generated by station operation. Construction activities will result in a temporary increase in existing traffic volumes in the project area.
- If yes, is the existing road network adequate to handle the additional traffic? ☐ Yes ☐ No

D. Informational Details

Attach any additional information as may be needed to clarify your project. If there are, or may be, any adverse impacts associated with your proposal, please discuss such impacts and the measures which you propose to mitigate or avoid them.

E. Verification

I certify that the information provided above is true to the best of my knowledge.

Applicant/Sponsor Name Jeffrey L. Riback, Consolidated Edison Company of New York, Inc. Date May 29, 2009

Signature  Title Assistant General Counsel

If the action is in the Coastal Area, and you are a state agency, complete the Coastal Assessment Form before proceeding with this assessment

