

## **Attachment A      Response to Comments on the Environmental Assessment**

### **A. INTRODUCTION**

This document summarizes and responds to comments on the *Brooklyn Bridge Park Section 6(f) Conversion Environmental Assessment* (EA) released for a 30 day public and agency comment period from June 5 to July 5, 2013.

Section B provides a summary of the comments received and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Where more than one commenter expressed similar views, those comments have been grouped and addressed together.

### **B. SUMMARY OF COMMENTS AND RESPONSES**

**Comment 1:** I support the plan for conversion of the Tobacco Warehouse and Empire Stores. The conversion, including the adaptive reuse and historic preservation of the Empire Stores and Tobacco Warehouse and the creation of new recreational opportunities on the replacement parcels, will enable Brooklyn Bridge Park to continue to transform the Brooklyn waterfront into a world-class facility.

**Response:** Comment noted.

**Comment 2:** We are opposed to the conversion of the Tobacco Warehouse and Empire Stores as proposed.

**Response:** Comment noted.

#### **CONVERSION OF TOBACCO WAREHOUSE**

**Comment 3:** The conversion of Tobacco Warehouse, with a flexible design for the indoor theater and with a multi-use community room and a garden in the Tobacco Warehouse triangle, will provide amenities to the public in the park.

**Response:** Comment noted.

**Comment 4:** The proposed conversion will allow St. Ann's Warehouse to create a performance space that will enliven the park at night and enhance the neighborhood and the city. Parks throughout the city are hosts to entertainment venues and are benefited by them.

## Brooklyn Bridge Park Section 6(f) Conversion EA

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**Response:** Comment noted.

**Comment 5:** The best way to preserve a building is to give it an economically viable use, and the St. Ann's Warehouse proposal will do that for the Tobacco Warehouse.

**Response:** Comment noted.

**Comment 6:** There is strong community opposition to removing public access to parkland by building a structure within the landmarked brick shell of the Tobacco Warehouse. This historic structure is an important asset to the Brooklyn Bridge Park and should not be privatized. The local community wants the Tobacco Warehouse to remain an open air structure that provides public access with unique views of the harbor.

**Response:** Comment noted. The purpose of converting the Tobacco Warehouse from Section 6(f)-protected land is to allow for its rehabilitation, preservation, and adaptive reuse, which will ensure its long-term preservation, as described on pages 1-4 and 1-5, and analyzed on pages 3-12 and 3-13, of the EA. Adaptive reuse of the Tobacco Warehouse as a year-round cultural facility would provide funding for the maintenance and preservation of this historic structure. Without the conversion, funding would not be available to stabilize, preserve, and maintain this structure. With the conversion, the Tobacco Warehouse would include a community space within the proposed enclosed portion of the building. The triangular portion of the Tobacco Warehouse structure would remain uncovered and generally open to the public and would continue to provide public access to Brooklyn Bridge Park and views to the harbor.

**Comment 7:** There are reasonable alternative sites to the use of the Tobacco Warehouse for a new St. Ann's Warehouse Theater in the vicinity of the proposed location. Empire Stores is a viable alternative site. The future developments at Piers 1 and 6 and John Street could also incorporate the St. Ann's Warehouse theater. The New York City Department of Environmental Protection (NYCDEP) building under the Manhattan Bridge that is proposed as a replacement space could have an adaptive reuse as a theater. The location that St. Ann's Warehouse is leasing for the next three years could provide a long-term home for the theater.

**Response:** The question of whether there are possible alternative sites for a new St. Ann's Warehouse is beyond the scope of the environmental review, which assesses the potential environmental impacts of the proposed Section 6(f) conversion. The EA appropriately considers whether there are any feasible alternatives to the conversion of the Section 6(f)-protected land, including the Tobacco Warehouse. The EA describes the evaluation of alternatives to the proposed conversion that was conducted in Chapter 1, "Background and Purpose and Need." As discussed there, the Brooklyn Bridge Park Corporation and the City of New York considered ways to ensure the long-term preservation of the

historic structures—i.e., Empire Stores and the Tobacco Warehouse—without the Section 6(f) conversion but determined that they were not feasible. The Tobacco Warehouse is structurally sound today, but will continue to require restoration and upkeep. Absent conversion, private lessees could not provide the funding necessary to stabilize, preserve and maintain these structures. Securing other sources of funding is not feasible given the constraints on public funding.

## CONVERSION OF EMPIRE STORES

**Comment 8:** The proposal would allow for the adaptive re-use of the Empire Stores for commercial development, creating a hub of activity in the northern part of the park and adding amenities such as office space, retail and restaurants. This would also provide a revenue source for Brooklyn Bridge Park, ensuring that the entire park continues to be well maintained. Re-use of Empire Stores also has great potential for job creation. This building has been dormant for too long.

**Response:** Comment noted.

**Comment 9:** The statements made in the conversion application regarding the Empire Stores are not truthful. The buildings are a treasure that needs to be carefully developed to preserve their character and be an asset to the community rather than a detriment. Changing the outward appearance of the buildings by adding space upward of including additional outside structures does not achieve these goals. The proposals for redevelopment of the Empire Stores all include limited public space and will lead to a deterioration in residential as well as park experiences. Since the buildings are being integrated into the park, I had hoped that they would have larger public spaces rather than restricting the space to private events, offices, and restaurants.

**Response:** The EA describes the existing condition of the Empire Stores, including the fact that the structure is an important historic resource, in Chapter 3, “Affected Environment and Environmental Impacts.” As discussed there, the Empire Stores is an important historic structure that also serves as a buffer between the park and the surrounding neighborhood. However, it is in a considerable state of disrepair, closed to the public, and marred by scaffolding and graffiti. As described in Chapter 2 of the EA, “Alternatives,” the New York State Office of General Services declined to issue a Certificate of Occupancy due to the building’s structural and safety issues. The proposed conversion would allow for the maintenance and ultimate long-term preservation of this important Brooklyn landmark. Any adaptive reuse would be undertaken pursuant to review by the State Historic Preservation Office (SHPO) of the New York State Office of Parks, Recreation and Historic Preservation (OPRHP), and in accordance with the Secretary of the Interior’s Standards for Rehabilitation. In a letter dated May 30, 2013 (including in Appendix B of the EA), the SHPO has found that the

## Brooklyn Bridge Park Section 6(f) Conversion EA

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proposed conversion would have No Adverse Effect on properties eligible or listed on the National Register of Historic Places. The design will also be presented to the New York City Landmarks Preservation Commission (LPC) for advisory review.

The EA also considers the effects of the proposed conversion on the remaining park. As discussed in Chapter 3 of the EA, the Empire Stores is currently closed to the public and the removal of Empire Stores from the Section 6(f)-protected land will not lead to a deterioration in park experiences. The future use of the Empire Stores after conversion of the Section 6(f)-protected land is beyond the scope of the environmental review. The National Park Service's guidance on environmental review of Section 6(f) conversions requires evaluation of the potential impacts on the remaining Section 6(f)-protected land of 1) the removal of the land that is proposed to be converted and 2) the addition of the replacement parcels to the Section 6(f)-protected land. It specifically excludes evaluation of the future use of the conversion parcels (e.g., the Empire Stores and Tobacco Warehouse) once this land is no longer Section 6(f) protected land.<sup>1</sup> The Brooklyn Bridge Park Corporation will actively work with the community, local city agencies, and the local Business Improvement District to address specific concerns regarding the adaptive reuse of the Empire Stores. Brooklyn Bridge Park has and will continue to engage the community through the Brooklyn Bridge Park Community Advisory Council.

### REPLACEMENT PARCELS

**Comment 10:** The conversion would allow for integration of new replacement parcels into Brooklyn Bridge Park, which expand and bring additional recreation and park amenities to the popular, northern end of the park. The replacement parcels will provide an expanded lawn, a new and expanded dog run, a bouldering wall, outdoor community space, and an outdoor park support facility. In addition, the adaptive reuse of the NYCDEP building will serve many needs of the park and the public, including providing a much-needed indoor educational space that can be used by local public school students and others, as well as much-needed restrooms for the park. With the new lawn, enhancements to the NYCDEP building, and demolition of the New York City Department of Transportation (NYCDOT) paint shed, the site design will open up vistas and views, create more green space, and better integrate the northern portion of Brooklyn Bridge Park into D.U.M.B.O. It will also activate an area that is now a bit industrial.

**Response:** Comment noted.

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<sup>1</sup> National Park Service, *Land and Water Conservation Fund State Assistance Program*, Federal Assistance Manual Volume 69, Effective Date: October 1, 2008, pgs. 4-5, 4-8, 4-9, 8-8.

**Comment 11:** The conversion proposal would remove valuable parkland in exchange for an acre of asphalt under the Manhattan Bridge. This land is undesirable because of traffic noise and is hardly comparable to Brooklyn waterfront open space. The conversion valuation should be independently reviewed and completed, because the two parcels of land are not equal in terms of value.

**Response:** The EA considers noise levels at the Section 6(f)-protected land and the replacement parcels and the recreational use of and views from the replacement parcels. As discussed in Chapter 3, “Affected Environment and Environmental Impacts,” although the noise levels would be higher than recommended for park uses, they are consistent with noise levels in other New York City parks near major roadways. Also as discussed in Chapter 3, the replacement parcels would allow for the creation of new recreational opportunities and support facilities close to the Section 6(f)-protected land and provide additional public access to waterfront views between the Brooklyn and Manhattan Bridges. The fair market valuation and the recreational equivalency of the proposed replacement parcels are beyond the scope of this environmental review, which assesses the potential environmental impacts of the proposed Section 6(f) conversion. In accordance with applicable Land and Water Conservation Fund Act regulations, those factors will be considered by the National Park Service as a prerequisite to approve the conversion application. 36 CFR § 59.3(b).

**Comment 12:** The replacement parcels do not serve as an equivalent replacement because proposed use is maintenance and operations, best served elsewhere in the park without blocking scenic view corridors. The proposed use on these parcels does not in any way enhance the purpose of dedicated parkland.

**Response:** As described above in the response to Comment 11, whether the replacement parcels are of reasonably equivalent usefulness as the converted parcels is beyond the scope of the EA but will be considered as part of the application for conversion.

The EA describes the proposed program and design for the replacement parcels in Chapter 2, “Alternatives,” and considers the effects on recreational users of the park of the proposed conversion in Chapter 3, “Affected Environment and Environmental Impacts.” As described and illustrated there, only a small portion of the replacement parcels would be used for maintenance and operations. The proposed new park entry plaza in the location of the existing parking in the Washington Street streetbed, demolition of the NYCDOT paint shed, and the creation of new landscaping and paths that connect to waterfront beach access points and promenade, would provide new views through the park and of the harbor. Other proposed educational and recreational elements, including an outdoor nature exhibit facility and a bouldering wall, would provide appropriate dedicated parkland amenities.

**PUBLIC INVOLVEMENT**

**Comment 13:** The Brooklyn Bridge Park Community Advisory Council passed a resolution in 2012 supporting the separate vision developed by the Park Expansion Design and Development Committee (PEDDC) for green, open parkland without buildings for the proposed replacement properties. The plan as proposed by Brooklyn Bridge Park does not represent the principles most important to the community, which include an educational platform related to sustainability, providing enriched public access to the waterfront, and responsible heritage tourism.

**Response:** Following the passing of the Brooklyn Bridge Park Community Advisory Council resolution, Brooklyn Bridge Park worked closely with the Park Expansion Development and Design Committee to incorporate their feedback and refine the design. The final design reflects much of the committee's ideas and suggestions. As described in Chapter 2 of the EA, the NYCDEP building would provide valuable indoor space for a year-round nature interpretive center for classes and school groups. This educational component would complement the proposed outdoor space, which is envisioned as an exhibit and education area to provide public information regarding the park's ecology and habitat, as well as providing a composting program. The removal of the parking within the Washington Street streetbed and replacement with a new park entry plaza, and the creation on the replacement parcels of new landscaping and paths that connect to waterfront beach access points and promenade, would provide improved public access to the waterfront.

**Comment 14:** Commenters noted that the conversion process has been the subject of much study, some controversy, and much community input. Comments and input from community members have helped shape the proposed plan. However, other commenters noted that many other people would have commented, but we only got notice on July 3rd, and many people are on vacation. With such short notice, people won't have time to comment

**Response:** Comment noted. The EA describes the extensive public participation that has occurred in Chapter 4, "Coordination and Consultation." A 30-day comment period was provided for the public's review of the EA in accordance with the requirements of NPS' NEPA guidelines. Notices were placed in *The Daily News*, the *City Record*, and on Brooklyn Bridge Park's website commencing June 5, 2013. The notice was also provided via email to numerous entities listed in Chapter 4 of the EA, including elected officials; city, state, and federal agencies; and community groups including Community Boards 2 and 6, the Brooklyn Bridge Park Community Advisory Council, and the Dumbo Neighborhood Alliance. The public notice included the date, time and location of the public hearing held at Polytechnic University of New York on June 20,

2013. The notice indicated where the EA may be accessed and reviewed, including on Brooklyn Bridge Park's website and at Brooklyn Bridge Park's offices.

## REDEVELOPMENT OF THE TOBACCO WAREHOUSE

**Comment 15:** I have concerns with the signage of St. Ann's Warehouse being placed on the south-facing wall of the Tobacco Warehouse. This space has been dedicated to public use and not for private advertising. It is inappropriate to have a large and illuminating sign on a structure that is filled with historic memories.

**Response:** The future use of the Tobacco Warehouse after conversion of the Section 6(f)-protected land is beyond the scope of the environmental review. See response to Comment 9. Additionally, in a letter dated May 30, 2013 (included in Appendix B of the EA), the SHPO has found that the proposed conversion would have No Adverse Effect on properties eligible or listed on the National Register of Historic Places. As described in the Brooklyn Bridge Park project's Letter of Resolution (LOR) executed pursuant to Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law, the adaptive reuse of the Tobacco Warehouse will be conducted in a manner that respects the architectural and historic significance of this historic resource. The design, including any signage, would be reviewed by the SHPO. The design has been reviewed by LPC on an advisory basis, and LPC issued a positive advisory report.

**Comment 16:** The conversion will provide a much-needed permanent home for St. Ann's Warehouse, one of Brooklyn's most important cultural institutions and one that has helped to establish D.U.M.B.O. as a cultural destination. St. Ann's Warehouse provides important support to other cultural institutions in Brooklyn, including technical and marketing expertise, and serves as an anchor that attracts audiences. A new theater for St. Ann's Warehouse in the Tobacco Warehouse will create a cultural hub in the park and enliven an underutilized space.

**Response:** Comment noted.

**Comment 17:** The proposed design for the Tobacco Warehouse is impressive and sensitive to the historic fabric of this important building. The Tobacco Warehouse is an iconic structure in a dramatic setting, and the new design will enhance those features.

**Response:** Comment noted.

## **Brooklyn Bridge Park Section 6(f) Conversion EA**

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**Comment 18:** It's important to entrust the preservation of a historic structure to an organization with the capabilities, and St. Ann's Warehouse has those capabilities, since it began as an organization that preserved and restored St. Ann's Church.

**Response:** Comment noted.

### **REDEVELOPMENT OF THE EMPIRE STORES**

**Comment 19:** The redevelopment of Empire Stores has the potential for neighborhood disruption, which is of concern to nearby residents. I know that Brooklyn Bridge Park has committed to meeting with the developer of the Empire Stores and the community to address community concerns. We look forward to those discussions, including plans for spaces with evening activities that are outdoors and will be visible to residents and community members.

**Response:** The future use of the Empire Stores after conversion of the Section 6(f)-protected land is beyond the scope of the environmental review. See response to Comment 9. As noted in the comment, the Brooklyn Bridge Park Corporation will actively work with the community, local city agencies, and the local Business Improvement District to address specific concerns regarding the adaptive reuse of the Empire Stores. Brooklyn Bridge Park has and will continue to engage the community through the Brooklyn Bridge Park Community Advisory Council.

**Comment 20:** Putting additional space on top of the Empire Stores is not in the best interest of the community and is above what is sustainable and reasonable. Downsizing the redevelopment by eliminating this addition would make the redevelopment more palatable to the neighborhood.

If the building must be expanded in size, why not extend the building on the south end, where it is already a story shorter than the Main Street end? Why not put the event spaces and restaurants at the end of the building closest to the Brooklyn Bridge, where they would be less intrusive to the current residential buildings on Main and Water Streets?

I am concerned about noise, smells from rooftop development, as well as a loss of privacy. The redevelopment proposals seem to be conceived in a vacuum addressing only the water and the bridges with no consideration of surrounding residential development and the resulting problems the redevelopment may bring.

When we moved to D.U.M.B.O., we were told that the Empire Stores were a landmark structure and could never be developed above their current size. The redevelopment proposals are not consistent with the landmark designation. Many of the proposed designs do not seem in keeping with the character of the

buildings by adding additions, outside stairways, etc., so that the historical significance of the current buildings is lost. While the rooftop addition is not supposed to be visible from anywhere on the street, none of the proposals achieve this.

**Response:** The future use of the Empire Stores after conversion of the Section 6(f)-protected land is beyond the scope of the environmental review. See response to Comment 9.

However, it should be noted that development of the Empire Stores will comply with Brooklyn Bridge Park's General Project Plan (GPP) and the program analyzed in the Brooklyn Bridge Park 2005 Final Environmental Impact Statement (EIS).

In a letter dated May 30, 2013 (included in Appendix B of the EA), the SHPO has found that the proposed conversion would have No Adverse Effect on properties eligible or listed on the National Register of Historic Places. Adaptive reuse designs for the Empire Stores, including any rooftop or other additions, will require design review and approval by SHPO and comply with the projects LOR as noted in the Response to Comment 15. The designs will also be presented to LPC for advisory review. These agencies will consider the visibility of any proposed additions in providing design approval.

As described in the response to Comment 19, the Brooklyn Bridge Park Corporation will continue to actively work with the community, local city agencies, and the local Business Improvement District to address specific concerns regarding the adaptive reuse of the Empire Stores.

**Comment 21:** The park has a lot of opportunity for event space, and I am not in favor of building new event space of the roof or in the building at Empire Stores.

The plans to have open event space on the rooftop of the Empire Stores will lead to intrusive and continuous increase in noise levels and light pollution for residential buildings on Main and Water Streets. This plan should be eliminated, or the space should be reduced in size and shifted away from residential buildings. The times of operation should be limited so that events end early in the evening and music should not be permitted.

**Response:** The future use of the Empire Stores after conversion of the Section 6(f)-protected land is beyond the scope of the environmental review. See response to Comment 9. As described in the response to Comment 19, the Brooklyn Bridge Park Corporation will continue to actively work with the community, local city agencies, and the local Business Improvement District to address specific concerns regarding the adaptive reuse of the Empire Stores.

**Comment 22:** The Environmental Assessment draws its analysis from the original Brooklyn Bridge Park Final EIS completed in 2005, and indicates that the environmental

## **Brooklyn Bridge Park Section 6(f) Conversion EA**

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effects of the Empire Stores and Tobacco Warehouse projects will be no different than what is noted in the 2005 EIS. Since then, the neighborhood has changed tremendously, with increases in traffic and noise. In particular, the neighborhood has seen great change over the past five years with rerouting of buses, commercial traffic, residential traffic, cycling traffic, and pedestrian traffic increasing rapidly, and the recent upzonings in D.U.M.B.O. have not yet been built. It's already very congested and difficult to navigate. Visitor traffic to the park already far exceeds what was predicted in the EIS, before completion of the park, Empire Stores, Tobacco Warehouse, John and Dock Street projects, and other projects. The area may not be able to sustain additional car, truck, and pedestrian traffic, or the additional parking demand. The redevelopment raises pedestrian safety concerns and concerns about air pollution and noise pollution. There should be an updated EIS before redevelopment of the Empire Stores is permitted, so that the effects of the new plans on the surroundings and the park itself are better understood.

The changed conditions since completion of the EIS in 2005 include updated information about flooding related to climate change. Parts of Brooklyn Bridge Park are below the Federal Emergency Management Agency's (FEMA) updated base flood elevations, even without accounting for climate change. Hurricane Sandy demonstrated that the entire D.U.M.B.O. waterfront is vulnerable to coastal flooding and this vulnerability is expected to increase. Any new development, including the Empire Stores and Tobacco Warehouse projects, should be built to withstand the impact of climate change and should be built according to the highest design and construction standards. The 2005 EIS is an inadequate basis for the current EA.

**Response:** The Environmental Assessment of the proposed conversion does not rely on the 2005 Final EIS, as stated in the comment. The 2005 Final EIS considered the effects of the planned development of Brooklyn Bridge Park as a whole, whereas the EA considers the effects only of the proposed conversion. As described in the EA in Chapter 3, the EA analysis incorporates information and technical analyses prepared for the Final EIS, where relevant. Existing conditions presented in the 2005 Final EIS were verified and updated, where needed in the analysis of the conversion, through Geographic Information Systems (GIS) and field verification.

As described in response to Comment 9, the future use of the Empire Stores after conversion of the Section 6(f)-protected land is beyond the scope of the environmental review.

It should be noted that development of the Empire Stores must comply with Brooklyn Bridge Park's GPP.

With respect to issues of flooding, Chapter 3 of the EA describes the fact that Brooklyn Bridge Park experienced extensive flooding during Superstorm Sandy, and that FEMA has issued updated maps (see page 3-3). In accordance with the

New York City Building Code, the proposed redevelopment of the Empire Stores will incorporate appropriate flood design measures.

**Comment 23:** I am concerned that the proposed redevelopment of the Empire Stores will adversely affect the unique character of the D.U.M.B.O. neighborhood. I'm also concerned about the traffic, pedestrian safety, parking, noise, and air quality impacts of the development on our neighborhood, including from a hectic loading dock in a small area.

**Response:** As described in response to Comment 9, future redevelopment of the Empire Stores is beyond the scope of the NEPA environmental review. As described in the response to Comment 19, the Brooklyn Bridge Park Corporation will continue to actively work with the community, local city agencies, and the local BID to address specific concerns regarding the adaptive reuse of the Empire Stores.

**Comment 24:** Deliveries, loading, and refuse pickup at Empire Stores and Tobacco Warehouse should be carefully thought through. I would like to see a limit on the size of trucks that can use Water Street. Any food-related businesses should have refrigerated refuse rooms.

We are concerned about the location of the loading docks for the Empire Stores redevelopment. The location of these docks will adversely affect the quality of life for residents of the area and also the safety and security of children in the area. As proposed, Main Street will become a congested loading and unloading dock. Main Street is already a major entrance to the park and often impassable due to buses, limos, weddings, and tourists. If activities are limited to nighttime, they would be in an area that has the highest concentration of residential housing in the area.

The park authorities' claims that trucks will load from Water Street and that truck size will be limited are not realistic. How would this be enforced?

The current plans do not have a realistic solution for sanitation needs. Since the development will be commercial, garbage removal will be by private carting companies. One company should be hired to handle all of the carting at a reasonable time of day so we don't get several trucks per night with back-up alarms and loud engines.

A mitigating solution would be to plan loading from the path between the Tobacco Warehouse and Empire Stores (south of the Empire Stores) or from the front (west) side.

**Response:** See the response to Comment 23.

## Brooklyn Bridge Park Section 6(f) Conversion EA

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**Comment 25:** In the past two years, residents of the neighborhood have been evacuated twice, due to Hurricanes Irene and Sandy. Adding development in the Zone A area will complicate any evacuation plans, endanger residents, and would make the ground-floor spaces difficult to occupy. To not adequately design the ground floor of this development to take this into account seems irresponsible and short-sighted.

**Response:** As described in response to Comment 9, the future use of the Empire Stores after conversion of the Section 6(f)-protected land is beyond the scope of the environmental review. As described in the response to Comment 22, the proposed redevelopment of the Empire Stores will incorporate appropriate flood design measures in accordance with the New York City Building Code.

**Comment 26:** When evaluating the proposals for redevelopment of Empire Stores, the park authorities should demonstrate a cost-benefit analysis showing how the new plan is essential to the park creation and how it is minimized to reduce negative effects on the park and surrounding area.

**Response:** As described in Chapter 2 of the EA, rehabilitation of the Empire Stores by a private developer is needed to fund not only the building's structural stabilization and long-term preservation, but is also an integral part of Brooklyn Bridge Park's funding plan. As described in Chapter 1 of the EA, the General Project Plan that establishes Brooklyn Bridge Park identifies the Empire Stores as a revenue-generating development parcel. Under the terms of the Memorandum of Understanding that was signed by Governor Pataki and Mayor Bloomberg in 2002, Brooklyn Bridge Park must be financially self-sustaining to cover the cost of maintenance and operations of the park. In terms of evaluation of specific proposals for the adaptive reuse of Empire Stores, as described in response to Comment 9, the future use of the Empire Stores after conversion of the Section 6(f)-protected land is beyond the scope of the environmental review.