

Tonawanda Forge Site – Disadvantaged Community Assessment Report

Introduction

This Disadvantaged Community Report has been prepared to support evaluation of community context and environmental justice considerations associated with the Tonawanda Forge site in Tonawanda, Erie County, New York. The site is a New York State Superfund site, and DEC's remediation framework is intended to investigate, evaluate, and address contamination at sites that may pose a significant threat to public health or the environment. Under the Climate Leadership and Community Protection Act, New York established statewide criteria for identifying disadvantaged communities, and DEC developed the Disadvantaged Community Assessment Tool (DACAT) to help agencies screen whether a designated disadvantaged community may have an increased likelihood of experiencing a moderate to large impact based on existing burden and vulnerability conditions.

Site History

The site is the Tonawanda Forge site, located at 2390 Kenmore Avenue, Tonawanda, Erie County, New York, and identified by Site No. 915274 in New York's State Superfund Program.¹The property is approximately 33.2 acres and is bordered to the north, west, and south by the General Motors Tonawanda Engine Plant facility, and to the east by UAW-GM Boulevard. Historically, the property was part of the neighboring General Motors Tonawanda Engine Plant until 1994, but it is now vacant. Demolition of former on-site buildings began in 2008, and during that process two spill cases, Spill Nos. 0911809 and 1112690, were opened to address releases involving petroleum and polychlorinated biphenyls (PCBs).²The site is listed as a Class 2 inactive hazardous waste disposal site in the State Registry of Inactive Hazardous Waste Disposal Sites. Under the State Superfund Program, a Class 2 designation means the site represents a significant threat to public health or the environment and requires action.

From an environmental justice perspective, this site history is relevant because it reflects a legacy industrial property with documented contamination, a formal Superfund designation, and proximity to surrounding neighborhoods and community receptors. The site's history of industrial use, the presence of contaminated soil, sewer sediment, and surface water provide important context for evaluating existing environmental burdens in the surrounding community.

Regulatory Context

New York's disadvantaged community framework is grounded in the Climate Leadership and Community Protection Act (CLCPA), which directed the Climate Justice Working Group (CJWG)

¹ New York State Department of Environmental Conservation, Environmental Remediation Database, Tonawanda Forge site details

² New York State Department of Environmental Conservation, *Tonawanda Forge, 2390 Kenmore Avenue, Tonawanda, New York, Site No. 915274, State Superfund Program Fact Sheet* (Feb. 2020)

to develop criteria for identifying disadvantaged communities across the State.³ The Climate Act defines disadvantaged communities as communities that bear burdens of negative public health effects, environmental pollution, and climate change impacts, and that possess certain socioeconomic criteria, or comprise high concentrations of low- and moderate-income households. On March 27, 2023, the CJWG approved and adopted the final disadvantaged communities criteria, establishing the statewide framework now used to identify DAC census tracts and guide equitable implementation of New York's climate, clean energy, and emissions-reduction programs.⁴ The final criteria are intended to support climate justice by helping ensure that frontline and overburdened communities benefit from the State's transition to cleaner energy, reduced pollution, and related public investment. Consistent with the Climate Act, New York State is required to invest or direct resources in a manner designed to ensure that disadvantaged communities receive at least 35 percent, with a goal of 40 percent, of the overall benefits of certain clean energy and energy efficiency spending.⁵

Disadvantaged Community Assessment Tool (DACAT)

To support agency review of potential disproportionate effects in disadvantaged communities, the New York State Department of Environmental Conservation (DEC) developed the Disadvantaged Community Assessment Tool (DACAT) as a screening resource. DEC guidance explains that the tool is intended to help agencies assess disproportionality and consider whether a potentially affected disadvantaged community has an increased likelihood of experiencing a moderate to large impact based on its existing burden and vulnerability conditions relative to relevant non-DAC comparison areas.⁶ The DACAT provides a structured way to evaluate whether a project may occur in a setting where cumulative environmental and socioeconomic conditions warrant closer scrutiny.

At the same time, DEC explicitly states that DACAT is not a stand-alone impact determination tool. Rather, it is intended as an initial screening tool to identify DAC census tracts that may warrant further consideration, analysis, and community input based on existing cumulative scores of environmental burden and population vulnerabilities. Accordingly, where a project is located within or may affect a designated DAC, the tool is designed to inform a broader environmental justice review that considers project-specific conditions, exposure pathways, community context, and opportunities for meaningful public participation.

DACAT Methodology

The DACAT tool classifies census tracts using U.S. Census urban-rural designations, with suburban tracts treated as rural for purposes of the analysis.⁷ It then evaluates three score

³ *New York State Climate Justice Working Group Finalizes Disadvantaged Communities Criteria to Advance Climate Justice*, N.Y. State Department of Environmental Conservation (Mar. 27, 2023).

⁴ *New York State Climate Justice Working Group Finalizes Disadvantaged Communities Criteria to Advance Climate Justice*, N.Y. State Department of Environmental Conservation (Mar. 27, 2023).

⁵ New York State Department of Environmental Conservation, *Disadvantaged Community Assessment Tool Methodology*.

⁶ New York State Department of Environmental Conservation, *Disadvantaged Community Assessment Tool Methodology*.

⁷ New York State Department of Environmental Conservation, *Disadvantaged Community Assessment Tool Methodology*, 6 NYCRR 617 – RIS Appendix A, at 1, 4–7

categories from the Climate Justice Working Group DAC map: the Combined Score, Environmental Burden Component Score, and Population Vulnerability Component Score. These categories are intended to characterize whether a census tract experiences comparatively elevated cumulative conditions relative to applicable non-DAC comparison tracts. The Combined Component Score reflects the tract's overall cumulative condition by integrating both burden and vulnerability dimensions. The Environmental Burden Component Score represents the extent to which the tract is affected by existing environmental stressors, exposures, or related burden conditions. The Population Vulnerability Component Score reflects community characteristics associated with increased susceptibility to harm, reduced adaptive capacity, or greater difficulty responding to and recovering from adverse environmental conditions.

For each category, the tool identifies the lowest applicable non-DAC comparison value, referred to as the aggregate denominator, and calculates the percent difference between the DAC tract score and that denominator. DEC states that DACAT indicates an increased likelihood that a proposed action may have a moderate to large impact where the tract's Combined Score exceeds the aggregate denominator by more than 25 percent and either the Burden Score or Vulnerability Score exceeds the aggregate denominator by more than 35 percent, or where the tract is designated as Indigenous land. At the same time, DEC emphasizes that DACAT is not a stand-alone impact determination; rather, it is an initial screening tool used to identify DAC census tracts that may warrant further analysis, additional information, and community input.

DACAT Results

The DACAT identifies the subject census tract in Tonawanda Town, Erie County, within the Western New York region as "Designated as DAC." The tract is classified by the tool as rural and is not identified as Indigenous lands. Reflected in Figure 1, the tract's Combined Component Score is 109.07, compared with an aggregate denominator of 62.19, resulting in a 42.98 percent difference. The Environmental Burden Component Score is 53.30, compared with an aggregate denominator of 26.82, resulting in a 49.68 percent difference.

The Population Vulnerability Component Score is 55.77, compared with an aggregate denominator of 34.66, resulting in a 37.85 percent difference. These results indicate that the tract exceeds the relevant comparison denominators across all three DACAT scoring categories.

The results indicate that site exhibits both elevated existing environmental burden conditions and elevated population vulnerability conditions. The comparatively high burden differential suggests that existing environmental stressors or exposure-related conditions are materially above the comparison denominator, while the elevated vulnerability differential indicates that the population may have a reduced capacity to absorb, respond to, or recover from additional adverse effects. In combination, these score relationships support the site's DAC designation and indicate that the surrounding community should be treated as a location with heightened potential for disproportionate impacts if additional environmental, operational, or nuisance burdens are introduced (such as increased noise, truck traffic, dust, odors, vibration, or lighting).

Overall, the DACAT results support that the Tonawanda Forge site is located within a census tract already characterized by cumulative conditions. Accordingly, any environmental justice review for the site should consider not only the magnitude of project-related impacts in isolation, but also whether those impacts would occur in a setting where baseline burdens and vulnerabilities are already above the relevant comparison thresholds.

Site Wise Results

Below is a summary of the evaluated Remedies and the calculated SiteWise Output for original remedy to the proposed amended remedy:

Remedy	Total Energy (MMbtus)	GHGs (Metric Tons CO2)
Original Remedy	2.60×10^4	1,439.74
Proposed Amended Remedy	2.62×10^4	1,437.45

CLCPA Section 7(3) Disadvantaged Community Impact Analysis DAC Identification

DACs are defined by the CLCPA as communities that are 1) Burdened by environmental pollution or other environmental hazards which bear negative health effects, 2) Containing high concentrations of people with low socioeconomic status including but not limited to low income, high unemployment, low levels of educational attainment, and/or members of groups, ethnicities, and populations that have experienced historical discrimination based on race or ethnicity, and 3) Vulnerable to impacts of climate change including floods, storm surges, and/or urban heat island effects. The Disadvantaged Communities Criteria, created by the Climate Justice Working Group, identifies communities of focus for remediation and environmental cleanup efforts. The results for such are available as an interactive web-based mapping tool to identify census tracts identified as DACs and provide specific, quantitative data that justifies the identification.

There are two census tracts within 0.5 miles of the Tonawanda Forge Site that are identified as DAC (Figure 1). Property residents located within both tracts are within proximity to the site and have potential to be impacted by an increase in exposure of potential pollutants that may be produced during remediation operations.

Census Tract 36029008400

Census Tract 36029008400 consists of a portion of the Town of Tonawanda and contains the site. This tract encompasses a portion of the western side of the city, on the east side of the Niagara River (Figure 1). The tract has a population of approximately 2,581. This census tract has an Environmental Burden (EB) that is higher than 98% of census tracts statewide and has a Population Vulnerability (PV) that is higher than 69% of census tracts statewide. This census

tract is defined by percentage of the population below the Federal Poverty Line that is higher than 65% of tracts statewide. According to the CLCPA Section 7(3) Disproportionate Burden Analysis Worksheet for this tract lists DAC indicators that are potentially related to air-related health effects and land use. The primary factors that contribute to the higher EB in this tract include the following:

- Proximity to Active Landfills: Higher than 89% of tracts statewide.
- Housing Vacancy Rate: Higher than 78% of tracts statewide.
- Industrial/Manufacturing/Mining Land Use: Higher than 99% of tracts statewide.
- Proximity to Major Oil Storage Facilities: Higher than 79% of tracts statewide.
- Proximity to Remediation Sites: Higher than 100% of tracts statewide.
- Traffic (Diesel Trucks): Higher than 87% of tracts statewide.
- Traffic (Number of Vehicles): Higher than 70% of tracts statewide.
- Proximity to Regulated Management Plan (Chemical) Sites: Higher than 100% of tracts statewide.
- Proximity to Wastewater Discharge: Higher than 72% of tracts statewide.
- Particulate Matter (PM_{2.5}): Higher than 72% of tracts statewide.
- Proximity to Inland Flooding Risk Areas: Higher than 76% of tracts statewide.

The primary factors that contribute to the higher PV in this tract include the following:

- Asthma ED Visits: higher than 64% of tracts statewide.
- COPD ED Visits: higher than 96% of tracts statewide.
- Heart Attack (MI) Hospitalization: Higher than 97% of tracts statewide.
- Low Birthweight: Higher than 75% of tracts statewide.
- Homes Built Before 1960: Higher than 67% of tracts statewide.
- Housing Cost Burden (Rental Cost): Higher than 62% of tracts statewide.
- Pct w/o Internet (home or cellular): Higher than 69% of tracts statewide.
- Pct <80% of Area Median Income: Higher than 68% of tracts statewide.
- Pct w/o Bachelor's/Es Degree: Higher than 67% of tracts statewide.

Census Tract 36029005801

Census Tract 36029005801 consists of a portion of the City of Buffalo. This tract encompasses a portion of the western side of the city, on the east side of the Niagara River (Figure 1). The tract has a population of approximately 3,301. This census tract has an Environmental Burden (EB) that is higher than 43% of census tracts statewide and has a Population Vulnerability (PV) that is higher than 93% of census tracts statewide. This census tract is defined by percentage of the population below the Federal Poverty Line that is higher than 87% of tracts statewide. According to the CLCPA Section 7(3) Disproportionate Burden Analysis Worksheet for this tract lists DAC indicators that are potentially related to air-related health effects and land use. The primary factors that contribute to the higher EB in this tract include the following:

- Industrial/Manufacturing/Mining Land Use: higher than 70% of tracts statewide.
- Proximity to Major Oil Storage Facilities: Higher than 69% of tracts statewide.

- Particulate Matter (PM2.5): Higher than 70% of tracts statewide.
- Proximity to Regulated Management Plan (Chemical) Sites: Higher than 99% of tracts statewide.

The primary factors that contribute to the higher PV in this tract include the following:

- Asthma ED Visits: higher than 77% of tracts statewide.
- COPD ED Visits: higher than 88% of tracts statewide.
- Heart Attack (MI) Hospitalization: Higher than 83% of tracts statewide.
- Low Birthweight: Higher than 85% of tracts statewide.
- Pct w/ Disabilities: Higher than 86% of tracts statewide.
- Pct w/o Health Insurance: Higher than 68% of tracts statewide.
- Homes Built Before 1960: Higher than 87% of tracts statewide.
- Premature Deaths: Higher than 94% of tracts statewide.
- Energy Poverty/Cost Burden: Higher than 94% of tracts statewide.
- Housing Cost Burden (Rental Cost): Higher than 96% of tracts statewide.
- Pct Renter-Occupied Homes: Higher than 66% of tracts statewide.
- Pct w/o Internet (home or cellular): Higher than 89% of tracts statewide.
- Pct <80% of Area Median Income: Higher than 77% of tracts statewide.
- Pct Single Parent Households: Higher than 91% of tracts statewide.
- Pct w/o Bachelor's/Es Degree: Higher than 93% of tracts statewide.

Potential Local Contributors to Environmental Burden Within ½ Mile of Site

Based upon information from the DEC InfoLocator Interactive Tool, industrial and commercial enterprises in the area that may contribute to the EB factors listed above include 1 chemical bulk storage facility, 11 petroleum bulk storage facilities, 1 wastewater facility, a major oil storage facility, an inactive waste landfill, and a recyclables handling facility and transfer station. Additionally, two active and/or closed remediation project areas within half a mile of the Site.

Conclusion

The Tonawanda Forge Site represents an example of a legacy industrial property where historical contamination intersects with environmental justice considerations. Its classification as a Class 2 inactive hazardous waste disposal site confirms the presence of significant environmental risks that require ongoing regulatory oversight and corrective action.

Screening-level results from the DCAT demonstrate that the site experiences both elevated environmental burdens and elevated population vulnerability relative to non-DAC comparison areas. The identification of the area as a Potential Environmental Justice Area (PEJA) based on income further reinforces the need for careful evaluation and enhanced public engagement. When viewed in combination with the surrounding community's disadvantaged community designation under the Act, the site's history and current conditions raise important questions about cumulative impacts and equitable outcomes through the remediation process. Due to the site's

presence within a disadvantaged community, adjustments or considerations will be made during remedial activities to reduce environmental impacts to the surrounding area. Remediation of the site will have a positive impact on the community. The environmental footprint from the site will be tracked during the Remedial Action and compared to the estimated footprint after remediation is complete.

Citations

New York State Climate Justice Working Group. (2023, March 27). *New York State Climate Justice Working Group finalizes disadvantaged communities criteria to advance climate justice*. New York State Department of Environmental Conservation.

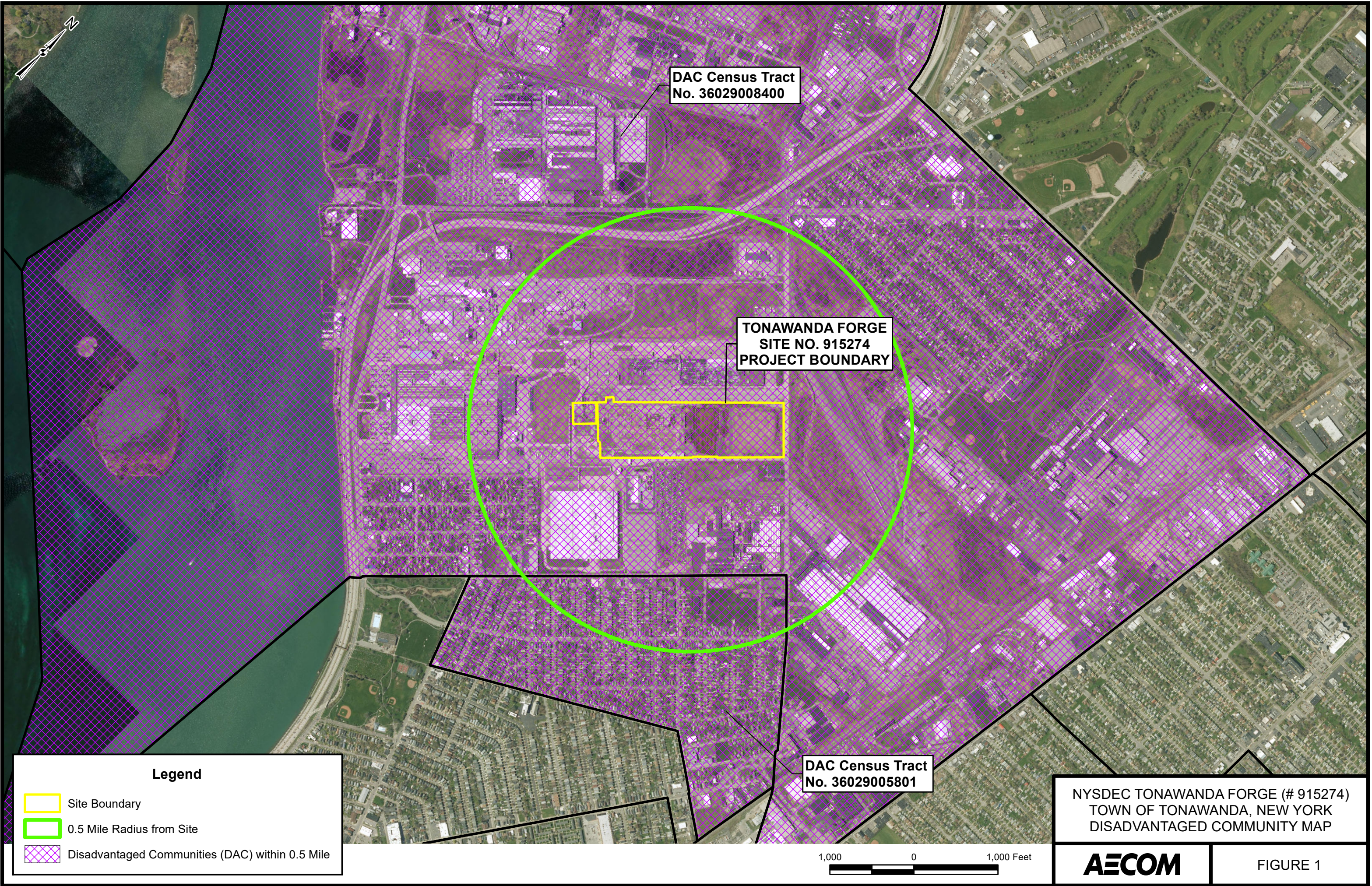
New York State Department of Environmental Conservation. (2020, February). *Tonawanda Forge, 2390 Kenmore Avenue, Tonawanda, New York, Site No. 915274, State Superfund Program fact sheet*.

New York State Department of Environmental Conservation. *Disadvantaged Community Assessment Tool Methodology: 6 NYCRR 617 – RIS Appendix A*.

New York State Department of Environmental Conservation. *Environmental Remediation Database: Tonawanda Forge site details*. Environmental Remediation Database.

FIGURES

C:\Users\maxwell.reis\OneDrive - AECOM\Documents\Tonawanda_Forge\MAPSIDAC_Figure.mxd 8/3/2026



Legend

-  Site Boundary
-  0.5 Mile Radius from Site
-  Disadvantaged Communities (DAC) within 0.5 Mile

**TONAWANDA FORGE
SITE NO. 915274
PROJECT BOUNDARY**

**DAC Census Tract
No. 36029008400**

**DAC Census Tract
No. 36029005801**

**NYSDEC TONAWANDA FORGE (# 915274)
TOWN OF TONAWANDA, NEW YORK
DISADVANTAGED COMMUNITY MAP**

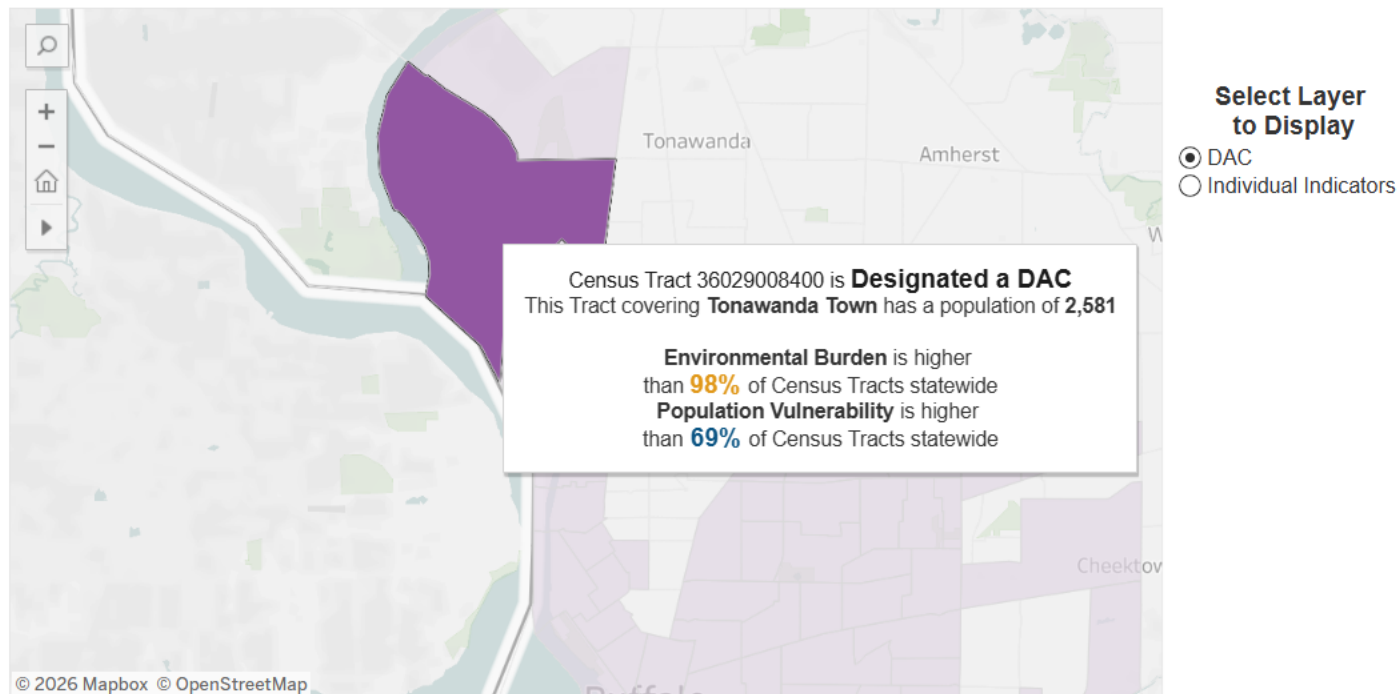
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FIGURE 1

1,000 0 1,000 Feet

APPENDIX A

DAC INDICATORS



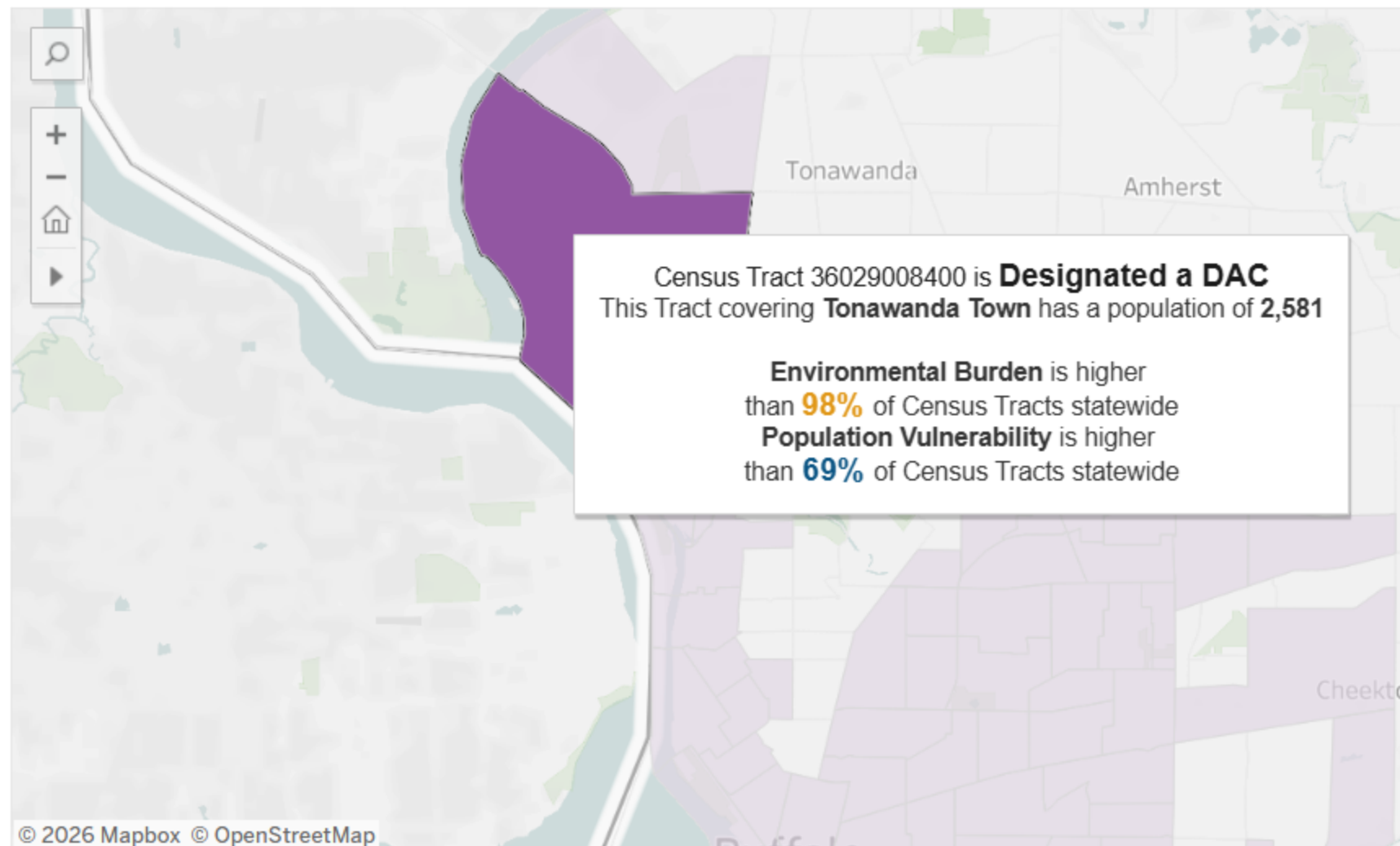
Click a Single Census Tract on the Map to View Indicator Details ⓘ

Population Characteristics & Vulnerability ...

Health Impacts & Burdens	Asthma ED visits	64%
	COPD ED visits	96%
	Heart attack (MI) Hospitalization	97%
	Low Birthweight	75%
	Pct Adults Age 65+	27%
	Pct w/ Disabilities	59%
	Pct w/o Health Insurance	58%
	Premature Deaths	59%
Housing, Mobility, Communications	Energy Poverty / Cost Burden	58%
	Homes Built Before 1960	67%
	Housing Cost Burden (Rental C..	62%
	Manufactured Homes	40%
	Pct Renter-Occupied Homes	28%
	Pct w/o Internet (home or cellul..	69%

Environmental Burden & Climate Change Risk ...

Land Use & Historic Discrimination	Active Landfills	89%
	Housing Vacancy Rate	78%
	Industrial/Manufacturing/Mining La..	99%
	Major Oil Storage Facilities	79%
	Municipal Waste Combustors	0%
	Power Generation Facilities	44%
	Regulated Management Plan (Ch..	100%
	Remediation Sites	100%
	Scrap Metal Processing	0%
Potential Climate Change Risk	Agricultural Land Use	42%
	Coastal Flooding and Storm Risk ..	0%
	Driving Time to Urgent/Critical Care	56%
	Extreme Heat Projections (>90° d..	17%
	Inland Flooding Risk Areas	76%



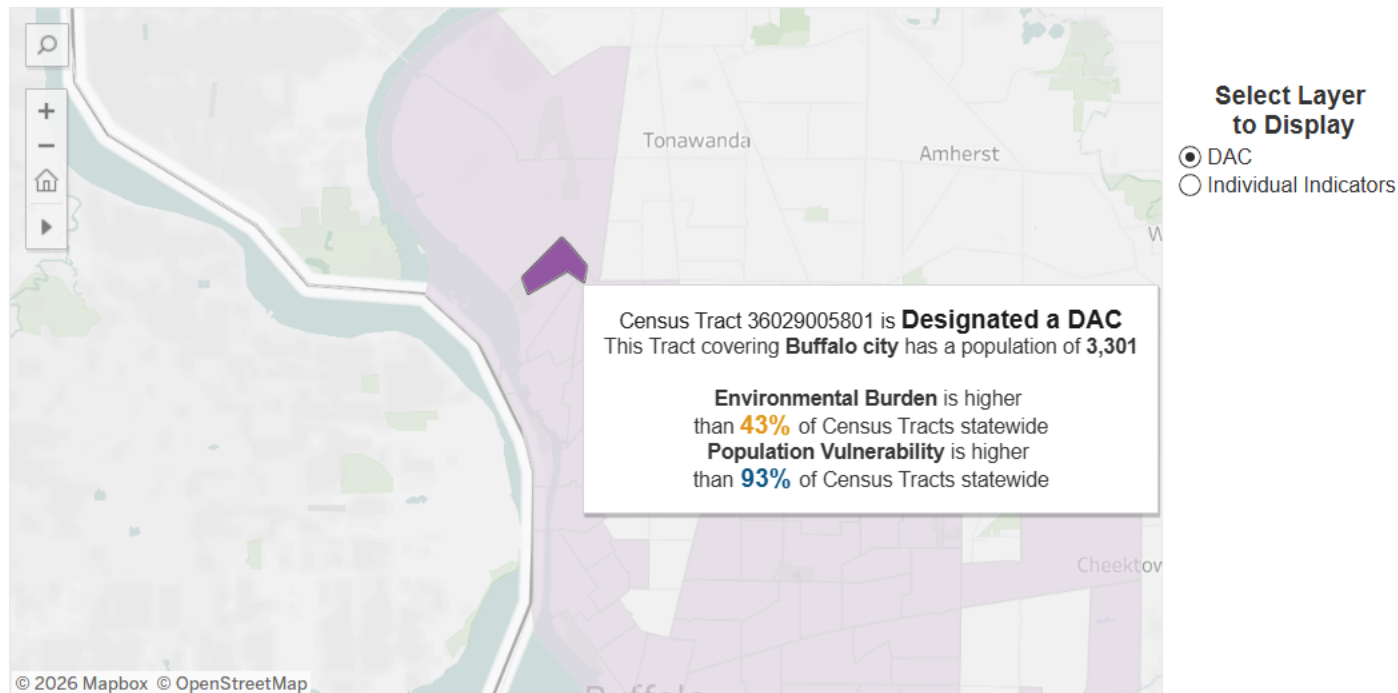
Click a Single Census Tract on the Map to View Indicator Details ⓘ

Population Characteristics & Vulnerability ...

	Manufactured Homes	40%
	Pct Renter-Occupied Homes	28%
	Pct w/o Internet (home or cellul..	69%
Income	Pct <100% of Federal Poverty ..	65%
	Pct <80% Area Median Income	68%
	Pct Single-Parent Households	43%
	Pct w/o Bachelor/Es Degree	67%
	Unemployment Rate	52%
Race/Ethnicity	Historical Redlining Score	21%
	Limited English Proficiency	18%
	Pct Asian	48%
	Pct Black or African American	65%
	Pct Latino/a or Hispanic	25%
	Pct Native American or Indigen..	61%

Environmental Burden & Climate Change Risk ...

	Regulated Management Plan (Ch..	100%
	Remediation Sites	100%
	Scrap Metal Processing	0%
Potential Climate Change Risk	Agricultural Land Use	42%
	Coastal Flooding and Storm Risk ..	0%
	Driving Time to Urgent/Critical Care	56%
	Extreme Heat Projections (>90? d..	17%
	Inland Flooding Risk Areas	76%
	Low Vegetative Land Cover	54%
Potential Pollution Exposure	Benzene Concentration (Modeled)	28%
	Particulate Matter (PM2.5)	72%
	Traffic: Diesel Trucks	87%
	Traffic: Number of Vehicles	70%
	Wastewater Discharge	72%



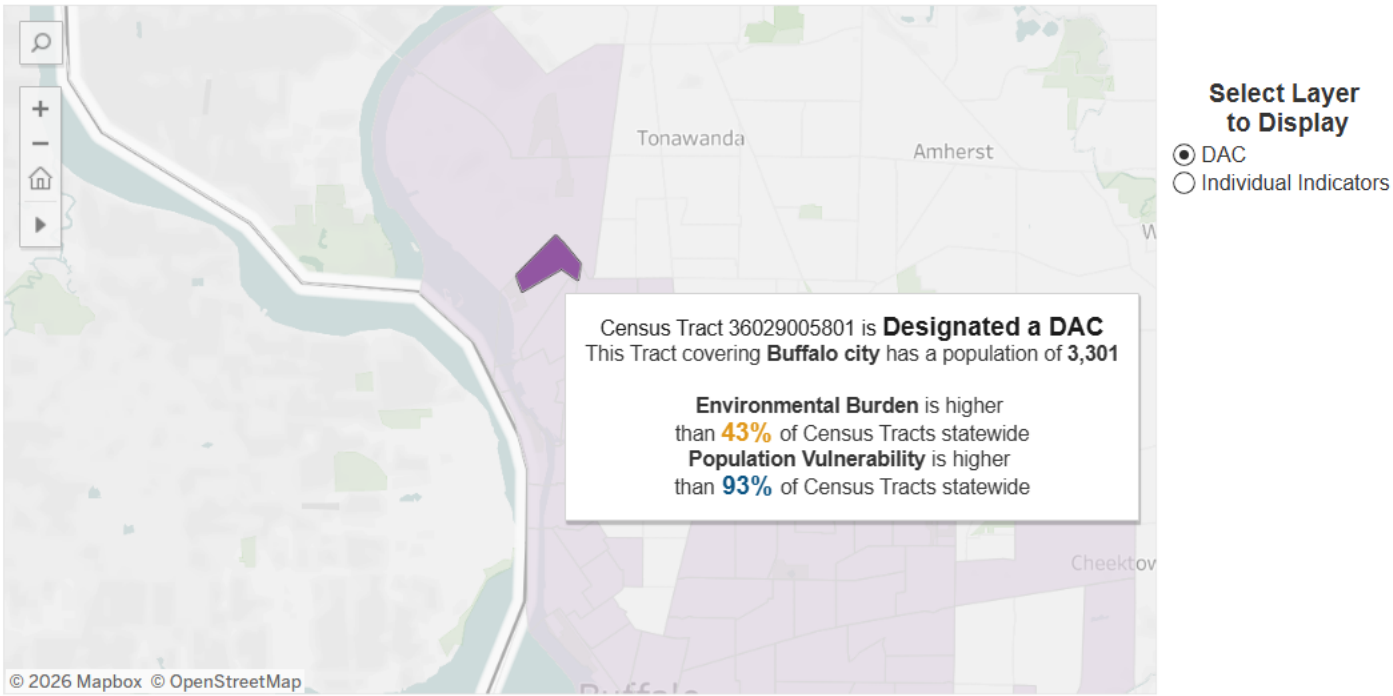
Click a Single Census Tract on the Map to View Indicator Details ⓘ

Population Characteristics & Vulnerability ...

Health Impacts & Burdens	Asthma ED visits	77%
	COPD ED visits	88%
	Heart attack (MI) Hospitalization	83%
	Low Birthweight	85%
	Pct Adults Age 65+	30%
	Pct w/ Disabilities	86%
	Pct w/o Health Insurance	68%
	Premature Deaths	94%
Housing, Mobility, Communications	Energy Poverty / Cost Burden	94%
	Homes Built Before 1960	87%
	Housing Cost Burden (Rental C..	96%
	Manufactured Homes	0%
	Pct Renter-Occupied Homes	66%
	Pct w/o Internet (home or cellul..	89%

Environmental Burden & Climate Change Risk ...

Land Use & Historic Discrimination	Active Landfills	0%
	Housing Vacancy Rate	49%
	Industrial/Manufacturing/Mining La..	70%
	Major Oil Storage Facilities	69%
	Municipal Waste Combustors	0%
	Power Generation Facilities	47%
	Regulated Management Plan (Ch..	99%
	Remediation Sites	57%
	Scrap Metal Processing	0%
Potential Climate Change Risk	Agricultural Land Use	0%
	Coastal Flooding and Storm Risk ..	0%
	Driving Time to Urgent/Critical Care	52%
	Extreme Heat Projections (>90? d..	17%
	Inland Flooding Risk Areas	0%



Click a Single Census Tract on the Map to View Indicator Details ⓘ

Population Characteristics & Vulnerability ...

	Manufactured Homes	0%
	Pct Renter-Occupied Homes	66%
	Pct w/o Internet (home or cellul..	89%
Income	Pct <100% of Federal Poverty ..	87%
	Pct <80% Area Median Income	77%
	Pct Single-Parent Households	91%
	Pct w/o Bachelor/Es Degree	93%
	Unemployment Rate	50%
Race/Ethnicity	Historical Redlining Score	14%
	Limited English Proficiency	64%
	Pct Asian	68%
	Pct Black or African American	71%
	Pct Latino/a or Hispanic	71%
	Pct Native American or Indigen..	64%

Environmental Burden & Climate Change Risk ...

	Regulated Management Plan (Ch..	99%
	Remediation Sites	57%
	Scrap Metal Processing	0%
Potential Climate Change Risk	Agricultural Land Use	0%
	Coastal Flooding and Storm Risk ..	0%
	Driving Time to Urgent/Critical Care	52%
	Extreme Heat Projections (>90? d..	17%
	Inland Flooding Risk Areas	0%
	Low Vegetative Land Cover	57%
Potential Pollution Exposure	Benzene Concentration (Modeled)	30%
	Particulate Matter (PM2.5)	70%
	Traffic: Diesel Trucks	18%
	Traffic: Number of Vehicles	24%
	Wastewater Discharge	49%