

Please accept these comments on the City's Wastewater Infrastructure on behalf of the Bronx Council for Environmental Quality (www.bceq.org). We are an all-volunteer membership 501c3 organization, founded in 1971 to protect the natural and historic environment. Since 2001, we have been focused on developing connections to and along the Harlem River and have created on-water access and activities in an effort to improve water quality. We formed a coalition of groups called the Harlem River Working Group. Our group received technical assistance from the National Park Service RTCA Program, were included in the Urban Waters Federal Partnership (UWFP); and raised more than a half a million dollars from two planning grants: the New York State Department of State's Harlem River Brownfield Opportunity Area (BOA) Steps 1 & 2; and Wildlife Conservation Society/NOAA Grant to capture stormwater from the elevated highway onto a pop-up wetland in an unimproved waterfront park. After completion, we asked NYS DOS about a Harlem River Watershed Plan and discovered that the Parks Department was able to apply for funding as a result of our BOA grant. For the past two years, we have been working on this with Parks – the DEP has been invited, as well.

We have waited for and are excited about the January 31, 2018 kickoff of the Long Term Control Plan for the Harlem River and the other Open Waters group for a long time. The Bronx side of the Harlem River waterfront has the distinction of having WI-056, the largest outfall in the city in terms of catchment area and volume discharged. We were told in 2006 that it discharged more than one billion gallons per year. It is the largest Tier 1 Outfall, constituting half the discharge contributed by CSOs along the Harlem River from parts of the Bronx and Manhattan. It has dry water discharges, as well. Since the 1990s, we have advocated for Daylighting Tibbetts Brook both inside and outside Van Cortlandt Park (including purchasing the CSX abandoned property outside the park) which would greatly reduce the occurrences of CSOs at WI-056. Can you tell us why the DEP's largest problem is being tackled last?

We believe that the DEP Plan has us slated to spend the next 15 to 25 years wasting ratepayer funds. Existing large concrete construction projects are very expensive and take long time to build. We see other LTCPs as a guide: Bronx neighbors are unhappy with the proposals for Westchester Creek, Hutchinson River and the Bronx River. Citywide plans fair no better. If the City Council wants to be effective, our sister cities, like Philadelphia and DC have good examples for us to follow.

Last month, I attended the NYC Soil and Water Green Infrastructure (GI) Tour of Philadelphia. All segments of the population are working together to capture every drop of water before it goes into the pipe. They have set and are reaching their goals. On the other hand, what is New York City's goal? Improving Water Quality? Removing existing discharges by 10% or 50%? Minimizing flooding? What is the schedule? The Budget? How does the budget impact the schedule?

Let's talk about the DEP GI public and right-of-way program. Every other city knows that GI is the quicker, less invasive and more economical option. The DEP GI plan manages 10% of impervious area. It is included in the LTCP as part of the "baseline", but the LTCP itself doesn't propose any new GI. While GI is better for the natural environment, the current design guideline only captures the small rain events. Given the increase rainfall intensity expected with climate change, they could do better by increasing the use of GI, extending the design to capture larger but more severe rain storms. (The Gaia Institute did this on Stratford Avenue in the Bronx.) If every block captured the 100-year storm, the area would be cooler, the river would be cleaner, and the treatment plant would not spend so much money on electricity cleaning clean water. I've even heard of a study comparing standard stormwater infrastructure with 18 rain gardens along a public right of way was enough to capture all the rain that fell on that catchment area.

Another GI program that is lacking is for the private sector. There has to be a better way to provide incentives for private stakeholders to build GI on their property. Discounting water fees based on what is built is a better idea than giving funding and asking private owners to sign away their rights for 20 years. If City Council wants this to work, everyone has to become partners and stakeholders together.

Lastly, something has to be done with the MS4 program. Same questions about the goals and plans apply. Most areas of the Bronx are surrounded by water and have direct discharges into those water bodies. In the Harlem River Watershed, we have Van Cortlandt Park -- most of that park and the CSX property mentioned above is not tied into a CSO pipe. To protect our waterways and stop flooding, we need for all of this to be recognized. Thank you.