

BRONX COUNCIL FOR ENVIRONMENTAL QUALITY SHORT FORM
LONG TERM CONTROL PLAN (LTCP) FOR THE HARLEM/HUDSON RIVER CSO AND MS4 FOR THE BRONX

1. GENERAL COMMENTS:

- 1.1. Use **100% Green Infrastructure as the “Preferred Alternative”** for the Harlem/Hudson River Watersheds on the Bronx side for both CSO and MS4. Compare other options with these plans to determine the most effective, efficient and economical method to achieve clean waterways. Combine like GI small construction projects together for a quicker and economical design build project.
- 1.2. Fund **maintenance for all GI projects maintenance** in each contract to build. Identify the responsible party and method to maintain. Bring something like the National Green Infrastructure Certification Program (<http://ngicp.org/>) to NYC to **train workers to design, build and maintain GI** in all public areas.
- 1.3. Provide a Bronx Harlem/Hudson River LTCP **timetable for completion in 2021** or within a five-year planning period. ***There should be no six month extension*** – DEP is already one year or ten years, or 50 years too late. Start now!
- 1.4. Concurrent with the LTCP, begin the processes of **Environmental Assessment Statement (EAS)** and **Environmental Justice CP-29** [Commissioner Policy 29 \(CP-29\) \(PDF\)](#). Provide public notification. As part of the EAS, kindly review and provide the data on the location and size of the discharge for the new sewer connections over the last 15 years (or since the latest CSO consent decree).
- 1.5. Hold **separate Bronx “Harlem/Hudson Rivers” area meetings** to discuss other alternatives and the method of comparing and evaluating each. Create a separate Bronx “Harlem /Hudson River” Watershed/Waterbody, then incorporate it with the other parts.
- 1.6. Adopt ***new Design Criteria*** based on **measurable goals to reduce runoff to zero discharge to the local pipe**.

2. SPECIFIC COMMENTS:

- 2.1. **Large GI projects.** Recognize both the **Tibbetts Brook Daylighting** and **Brook Park Wetland Projects** as two large GI projects and move them from CSO to MS4. This would include continuous maintenance even though both parkland projects would be under the jurisdiction of DPR. It would also include all of Van Cortlandt Park (including the Croton Plant, which although on the sewer, displaces a large quantity of stormwater separately to the street pipes) on an MS4 map.
 - 2.1.1. **The Tibbetts Brook Daylighting Project** is giant GI project, and should be DEP listed as such. Daylighting should move forward by immediately funding the purchase, reconstruction, daylighting and maintenance of the Tibbetts Brook Daylighting. This will lower the quantity of water into the Broadway pipe by 3 to 4 million gallons per day. This totally located in and impacts WI-056 which is the largest outfall and the third largest sub-catchment area.
 - 2.1.2. **Brook Park Wetland Daylighting Project** is another giant GI project, and should be DEP listed as such. This totally located in and impacts WI-066 which is the long and

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skinny outfall, which transects the middle of the west Bronx. As the stormwater is from the adjoining houses, credit should be developed and given to the homeowners for no stormwater discharge.

- 2.1.3. **Redesign NYCHA landscapes into sponges** by cultivating and replanting (some by community gardeners) where appropriate.
- 2.2. **Public Rain Gardens.** Increase **rain garden designs to capture the 100-year storm along the public street** right of way (ROW). At least one rain garden on each side of the block on any and all streets.
- 2.3. **Private GI.** Instead of deeding property to the DEP, redesign the private sector GI grant program so that the **private home owner can get a credit on storm water fees** if they build a green roof, green wall, or rain garden, and/or use a rain barrel to water its plants. If grant funding allocated in this section is not spent within the budgeted timeframe, the program should be reevaluated to make it more acceptable. This is a critical program which will save the City the expense of new streets and sewers.
- 2.4. **Waterfront GI.** Before it is too late, we have to increase the amount of natural areas along our shorelines by using Green Infrastructure (GI). Sustainable design guidelines for waterfront parks, wastewater systems and coastal infrastructure redevelopment (such as the Waterfront Alliance's WEDG certification) will achieve this goal, be aesthetically pleasing, and manage a natural waterfront with access for all. In the EIS, **Waterfront development along the Bronx side of the Harlem River** should be compared to adequately weight these goals in waterfront development. Both Mill Pond Park and the Fresh Direct warehouse are recent developments which we believe can be easily remedied by changes in policy that restore natural parkland, ie, a greenway.
 - 2.4.1. Work with **publicly and privately owned waterfront land owners, as well as large surface area landowners to protect** the water's edge from overland runoff, i.e., :
 - 2.4.2. Parkland should be developed for **waterfront parkland naturally with GI projects** along the shore, not managed recreation like baseball fields, tennis courts, or other non-porous hardscapes.
 - 2.4.3. NYS DOT, CSX/MN/Amtrak and other **large surface area landowners should be encouraged to develop waterfrontages naturally with GI.**
 - 2.4.4. Private waterfront property should be encouraged to use buffer land **within 200-300 feet from the edge to create a sponge-like GI greenway.**

ADOPTED BY THE BCEQ BOARD OF DIRECTORS AT A MEETING BY A MAJORITY PRESENT AND VOTING UNANIMOUSLY ON JANUARY 10, 2018. (2018 MOTION #1 LTCP OW), SECRETARY, KAREN ARGENTI