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December 2, 2019

Hon. Angela Licata, Deputy Commissioner and
Hon. Pinar Balci, Assistant Commissioner
New York City Department of Environmental Protection

By email to: ltcp@dep.nyc.gov

Re: Comments on the 2019 Citywide LTCP

Dear Commissioners Licata and Pinar,

These are comments on the New York City Department of Environmental Protection (DEP)'s Fall update to the Citywide/Open Waters Long Term Control Plan (Citywide LTCP). (DEC Case #CO2-20110512- 25 modifying #CO2-20000107-80).

We want to enthusiastically Thank you, and all the DEP engineers who worked on this thoughtful and excellent presentation concerning the Daylighting of Tibbetts Brook and other projects to protect Harlem River and its Watershed. We appreciate your hard work, and are happy to be working with you.

As you know¹, our history of comments on the Open Waters plan is long and extensive. The Bronx Council for Environmental Quality (BCEQ) is getting ready to celebrate 50 years with the Clean Water Act for our work as a nonprofit all volunteer organization fighting for clean water, air and soil for Bronx County, NYC and NYS. We have had many successes over the years, but this is the longest fight by far is this one. (One of our board members had been on the Citywide CAC in the 1990's.) Moreover, we have advocated for the use of Green Infrastructure even before the EPA 2007 letter urging its use, as well as the Putnam Trail from Van Cortlandt Park to and along the Harlem River since 1999. We are proud to be standing with you in combining these two projects: Daylighting Tibbetts Brook Project as the biggest Green Infrastructure commitment in the overall Citywide LTCP.

We are glad that the Citywide Plan includes not only removing the baseflow of Tibbetts Brook from the Broadway sewer but also calls for an open channel with a natural stream bed. An open channel with natural stream bed is crucial to the local environment to allow this area to absorb additional runoff from the surrounding areas and in order for it provide habitat for our local wildlife. We also support the "Van Cortlandt Lake Improvements" that are included. We agree with the Van Cortlandt Park Alliance to include a Living Shoreline Design, such as the one created by Dr. Paul Mankiewicz of the Gaia Institute and the Bronx Council for Environmental Quality. The Living Shoreline would help reduce the amount of sedimentation and pollution entering Van Cortlandt Lake as a result of runoff from the Major Deegan Expressway.

In addition, we have identified several projects that the DEP could use to both use to solve the problems of CSO pollution in Bronx waterbodies. These projects and practices will enable the DEP to capture runoff in some of the highest catchment areas and outfalls of the city in the Harlem River and Westchester Creek.

¹ Past letters are on file or can be found on our web page at this little link: <https://bit.ly/2LdEOoD>



The list includes nine potential short-term Green Infrastructure (GI) projects:

1. Amalgamated Hilltop Project including the
2. Mosholu Parkway DEP (aka “Grove”) property as a model Rain Garden Open Space,
3. Riverdale Neighborhood House GI playground impervious surface replacement,
4. Living Shoreline proposals for Van Cortlandt Park Lake edge,
5. Living Shoreline proposal for Harlem River new parks at 144th Street,
6. Living Shoreline proposal for Harlem River new parks at Depot Place and
7. Living Shoreline proposal for Harlem River new parks at Fordham Landing No., and
8. Living Shoreline proposals for Harlem River new parks at Fordham Landing So.,
9. Living Shoreline proposals for Westchester Creek along the Hutchinson River Parkway and other nearby new construction.

Finally, we want to urge combining two important GI best practices, BMPs if you will: (1) mulching is one of the strongest supports for infiltration/porosity development; and (2) a full-time professional workforce program to ensure GI facilities work at peak performance standards.

We suggest the DEP make a greater commitment to projects such as these as it is essential to the effectiveness of the LTCP. GI provide quick and easily measured results indicating a movement toward zero discharge of stormwater pollution. Green Infrastructure is nature-based landscaping of soils to increase infiltration rainfall rates *in situ*, where it falls, as it meanders down to the base flow via tunnels created by ants and other creatures thereby contributing clean water to the nearest water body.

This beautiful and efficient method has successfully provided healthy ecological services for centuries. It is a proven superior alternative to the standard urban runoff method of water transport overland capturing sediments, pollutants and toxics with it as it speeds down the hill to the lowest polluted source. Green Infrastructure costs less, is more protective, and comes in many shapes and sizes. There are green roofs, bioswales, living shorelines, rain barrels, rain gardens, daylighting, methods to mold and cultivate your soil to make it more thirsty, trees, native plants, and a variety of creative designs for living shorelines with oyster reefs, castles, and other natural materials to protect and restore wetlands and the waterfront’s edge. It can also reduce flooding, which damages street infrastructure causing expensive repairs, and major accidents. Finally, less storm water pollution via green infrastructure also means less air pollution. A win- win: clean air and water!

Thank you for this opportunity to participate. Please respond with your comments. If you need any further information, contact Karen Argenti at 646-529-1990 or karen@bceq.org.

Sincerely,

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President, BCEQ

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c: Mikelle Adgate
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