



NEW YORK CITY WATER TRAIL ASSOCIATION

December 2, 2019

To: Vincent Sapienza
Commissioner, NYC Department of Environmental Protection

Re: Comments on the Retained Alternatives Summary for the Citywide/Open Waters Combined Sewer Overflow
Long Term Control Plan

Dear Commissioner Sapienza:

The New York City Water Trail Association is an umbrella group that aims to represent the common interests of the harbor's human-powered boating community, which now includes more than two dozen organized paddling and rowing groups as well as many independent boaters. Our mission is to support the safe use of the New York City Water Trail, founded by the city's Department of Parks and Recreation in 2008, to expand access to the public waterways, and to promote the environmental stewardship of the harbor and the estuary.

Perhaps more than any other stakeholder group, our constituents will be directly affected by the provisions of the DEP's proposed East River and Openwaters LTCP. While we have many concerns about the plan, two stand out:

First, despite numerous previous requests, the proposed LTCP fails to address specific waterways and launch locations in the harbor where sewage and stormwater pollution make recreational boating and swimming problematic. Instead, it lumps them together as a part of one all-encompassing waterbody (the 'East River and Open Waters') whose overall, 'averaged' water quality is proclaimed to be acceptable.

The list of those waterways and launch sites would best be developed in consultation with waterfront stakeholders and community groups, but at a minimum should include:

Steinway Creek
Port Morris
Bronx Kill
Halletts Cove
Anable Basin
Bushwick Inlet
Stuyvesant Cove
Wallabout Channel
Brooklyn Bridge Beach (Manhattan)
Dumbo Cove
Pier 4 Beach (Brooklyn Bridge Park)
Pier 101 Embayment (Governors Island)
Erie Basin
Gowanus Bay
Bush Terminal Park
Brooklyn Army Terminal



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Given the current (and probable future) levels of on-water recreation in these places, we don't believe the LTCP should be finalized until all of these sites are individually assessed and site-specific plans developed to eliminate or reduce CSO pollution. The assessment should include a thorough, year-round regimen of pathogens testing at near-shore sampling sites, not the handful of tests that have been proffered.

Second, the proposed LTCP fails to outline a strategy for better and more detailed CSO monitoring and notification, so that all interested residents can be promptly informed of the precise locations, times and amounts of sewage and stormwater releases.

Currently, the DEP offers a vague, once-a-day 'advisory' when pathogen levels in selected large waterbodies are predicted to exceed water quality standards. The LTCP should instead mandate the development and installation of real-time flow monitors at all its major outfalls, and it should create a robust modeling program that can predict overflow times and amounts at every other outfall in the system. This is a straightforward technical and communications challenge that an agency with DEP's resources should be able to meet, especially if it works in partnership with community stakeholders. And the information provided would allow community boathouses, event organizers, and individual boaters and swimmers to make truly informed decisions about whether or not to get on or in the water.

Thank you for your consideration and looking forward to your response.

Rob Buchanan

Steering Committee, New York City Water Trail Association