



November 28, 2016

Acting Commissioner Vincent Sapienza
New York City Department of Environmental Protection
9605 Horace Harding Expressway
Corona, New York 11368

Sent via email: ltcp@dep.nyc.gov

Re: Flushing Bay CSO Long Term Control Plan

Dear Commissioner Sapienza;

The New York City Department of Environmental Protection (DEP) is working on the Flushing Bay CSO Long Term Control Plan (Flushing Bay LTCP). The Guardians of Flushing Bay (Guardians), a coalition of Dragon Boat teams and their members, other human-powered boaters, environmentalists, and area residents whose mission is to advocate for and promote a clean and healthy Flushing Bay, submit the comments below on the Flushing Bay Long Term Control Plan Meeting #2 Presentation.

First of all, we thank DEP for making noticeable improvements in the LTCP process. We appreciate that the meeting presentation was more accessible to non-experts, meeting advertisements were provided in multiple languages, and DEP staff graciously and patiently addressed all of the questions raised during the meeting. However, we urge you to continue making improvements in the process and consider the following recommendations for the Flushing Bay LTCP:

1. Re-open and re-evaluate the Flushing Creek LTCP

- We strongly oppose chlorination at the outfall. The Flushing Creek LTCP should be re-opened and re-evaluated to determine the environmental and human health impacts chlorination at the CSO tank will have for Flushing Creek and Flushing Bay.
- We believe CSO reduction, in Flushing Bay and Flushing Creek, is the only solution for making our waterways swimmable and fishable. As frequent boaters of the Bay in all weather conditions, we can attest that chlorination will not make a waterbody more swimmable, as it will not reduce floatables or toxins in the waterway.

2. Approaches to CSO reduction in Flushing Bay

- We believe green infrastructure or tanks/storage solutions is a more holistic approach that will reduce floatables and toxins in the waterways, not only address bacteria. We commend DEP for leaning towards a CSO storage tunnel solution and hope this indeed becomes the preferred alternative for the LTCP submission to the State.
- Though we appreciate the investment DEP is looking to make in Flushing Bay, there are other alternatives that were brought up in the public meeting that we believe should be considered. If they have already been considered, we would like to see the rationale why they were not retained as alternatives:
 1. CitiField seems like an ideal location for a CSO tank to reduce CSOs from BB-006. Instead of building an entirely new tunnel, the tank would only need a pump station and use the existing network of interceptors along the Bay.
 2. An auxiliary wastewater treatment plant, such as the Spring Creek facility in Jamaica Bay, seems like a great alternative. We suggest looking at Willets Point, which will be undergoing redevelopment, is located at a low elevation on the Bay and Creek, and could also expand on the existing network of interceptors along the Bay.

3. Interim solutions

- Floatables must be addressed in the meantime. These alternatives won't be completed for at least a decade, and there are many inexpensive approaches we encourage DEP to consider immediately. For example, Baltimore's Mr. Trash Wheel has become a fun-loving icon for the Baltimore Harbor. We believe this could be an immediate and relatively inexpensive solution to a constant issue in the Bay.

4. LTCP process

- Future meetings must be more easily accessible by car and public transit.
- We again thank DEP for providing advertisements in multiple languages; we just ask that in future meetings they are provided at least three weeks in advance so they can effectively be used for outreach. One week in advance was not enough time to inform the community.
- We are concerned about the lack of marine scientists on staff at DEP and encourage DEP to bring in scientists to speak to chlorine toxicity and marine ecosystems at public meetings.

We look forward to the submission of the LTCP and further participation in the planning process. We may be reached at GuardiansofFlushingBay@gmail.com.

Yours truly,



Korin Tangtrakul

for Guardians of Flushing Bay