

Friends of Flushing Creek

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November 30, 2016

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Dr. James Cervino |
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Acting Commissioner Vincent Sapienza
New York City Department of Environmental Protection
96-05 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;

I am writing on behalf of Friends of Flushing a Creek, a nonprofit organization comprised of stakeholders, environmentalists and community representatives who are dedicated to ensuring the clean up of Flushing Creek.

Because Flushing Creek and Flushing Bay are essentially one waterbody and together have been the joint repository of more CSO and raw sewage releases than any other local waterway in New York City, we have also joined the efforts of Guardians of Flushing Bay to advocate for meaningful Long Term Control Plans to prevent the continued and unabated pollution from CSOs into both waterways.

Accordingly we submit the following recommendations and comments on the Flushing Bay LTCP:

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

Friends of Flushing Creek fundamentally disagrees with the decision to seasonally disinfect CSOs rather than address the need to reduce CSO volumes. The use of chlorine and it's residual release into the creek poses significant concerns. We share concerns of environmental experts regarding its reported health effects impacts, including breast and bladder cancer. Additionally, chlorine is toxic to shellfish and other beneficial organisms that are needed to restore the creek's oxygen level and to improve water quality.

The Flushing Creek LTCP should be re-opened and re-evaluated to determine the environmental impacts of chlorination in both Flushing Creek and Flushing Bay as well as the health impacts on the boaters who regularly recreate in these waters. Our concern is heightened given the pilot to determine chlorination levels is still underway in Spring Creek.

We believe CSO reduction, in Flushing Bay and Flushing Creek, is the only solution for making our waterways swimmable and fishable.

2. Approaches to CSO reduction in Flushing Bay

We believe green infrastructure combined with tank/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 urge that this becomes the preferred alternative for the LTCP submission to the State. However, we join the Guardians of the Bay in requesting that DEP provide an analysis and rationale for not considering an on-land CSO tank or an auxiliary wastewater treatment plant.

3. Interim Solutions

While long term solutions are sought floatables must be addressed now. DEP proposed alternatives will not be completed for at least a decade. We encourage DEP to implement one of the many inexpensive approaches articulated in the public participation process.

We look forward to continued efforts to address the unsustainable levels of CSO releases into the Flushing Creek and Bay. Please feel free to contact me for any additional information. I can be reached at arosasolutions@gmail.com.

Sincerely,

Alexandra Rosa

copy: Queens Borough President Melinda Katz
Councilmember Peter Koo
Guardians of Flushing Bay
Riverkeeper