

Rohit Aggarwala
Director of Long Term Planning and Sustainability
Mayor's Office of Operations
253 Broadway, 20th Floor
New York, NY 10007



Dear Mr. Aggarwala,

Storm Water Infrastructure Matters (S.W.I.M.) would like to thank you for facilitating our meeting with Ariella Rosenberg Maron in March to discuss how the S.W.I.M. coalition might work with your office to achieve swimmability in NYC waterways through natural, sustainable storm water capture. We are pleased to see that the Mayor's PlaNYC 2030 addresses many of our issues of concern. It is the first time in a long time that any mayor has tried to envision what our city should look like in the coming decades and we think the plan, if fully implemented, should do a lot to give us a greener, less polluted, more sustainable city.

The S.W.I.M. coalition is pleased to see that much of the water quality action plan reflects priorities articulated in the S.W.I.M. platform, and includes many measures that will benefit water quality. However, parts of the plan are not expansive enough. We offer our expertise to your office to help make PlaNYC 2030 one that fully supports sustainable waterways.

The S.W.I.M. coalition is excited to offer our resources and energy to the Mayor's Office of Long Term Planning and Sustainability on the following initiatives included in PlaNYC:

- Interagency BMP Task Force: As active stakeholders in our neighborhoods, S.W.I.M. coalition members have a wealth of knowledge about planned projects, infrastructure problems, and opportunities for cooperation that we hope will be utilized. While we are pleased that PlaNYC has initiated an inter-agency BMP task force, we must emphasize that it is critical for agencies to work not only with each other, but also with citizens to effectively and efficiently use and maintain BMP technologies. The CSO stakeholder meeting your office hosted on June 12, 2007 was a good start. S.W.I.M. recommends that the BMP Task Force create more formal opportunities for the participating agencies to actively engage and partner with the public – both in the planning and implementation stages of this initiative – in order to most effectively incorporate the knowledge, experience, and capacities of all stakeholders.
- Pilot promising BMPs: S.W.I.M. looks forward to sharing our vision for prioritizing specific sites and CSO-sheds as demonstration areas for storm water capture through greening. In particular, many of our coalition partners have developed, and are eager to share, their expertise in using the Bronx River Watershed as a site for pilot projects and their experience with shellfish habitat restoration projects. S.W.I.M. advocates for the use of green infrastructure in CSO-sheds around the city, especially those affecting waterbodies with strong community involvement and partnership

such as, the Bronx River, the Gowanus Canal, Coney Island Creek and Newtown Creek.

- Capture the benefits of the public realm plan: Coalition partners currently work with various city agencies to design, plan and build storm water capture projects on public property. We have worked to build and improve community gardens, green streets, street trees and green roofs. Coalition partners offer to bring crucial on-the-ground experience to PlaNYC through a collaborative partnership, which would facilitate widespread adoption of sustainable, source control storm water capture strategies. The coalition can also assist in the development and implementation of monitoring and evaluation of the biophysical and social impacts of these green innovations.
- Greening parking lots and incentivizing green roofs: S.W.I.M. supports policy reform and code changes that require and/or financially encourage green infrastructure. S.W.I.M. offers to collaborate on adapting other cities' greening approaches to the NYC context, which will help expedite this process for the City of New York.
- Protecting wetlands: S.W.I.M. partners work to restore fragmented freshwater and saltwater habitats around the city.
- Completing the CSO Long Term Control Plan: Many S.W.I.M. members have been active participants on the Department of Environmental Protection's citizen advisory committees on CSOs. We look forward to similar, continuing opportunities for public participation as that formal planning process moves to its next stage. S.W.I.M. also urges the city to fully integrate all of the storm water efforts of PlaNYC into the Long Term Control Plan process.

While working together on the initiatives listed above, we hope to encourage some revision of PlaNYC to address existing gaps, including the following:

- Despite early mentions that the water "recreation" goal would include swimming (*i.e.*, in the Mayor's September 21, 2006 press release), PlaNYC 2030 does not mention achieving swimmability in any of the city's waterways. The improvements projected in some of the tributaries would move waterbodies from "no contact" to "boatable/fishable". The 90% boatable/fishable goal is not ambitious enough – by the year 2030, the city will have had nearly 60 years to achieve the Clean Water Act's goal of *swimmable* and fishable waters. Where is the swimming?
- PlaNYC does not adequately address how its greening initiatives will be coordinated with those of the Department of Environmental Protection's Long Term Control Plans for CSO abatement.
- In the short term, while the BMP Task Force is doing its work, many city-owned construction projects will be designed and/or built. PlaNYC should be strengthened to include a directive to all city agencies that they should immediately incorporate BMPs into the design of their projects, with the goal of maximizing the use of on-site retention, detention and infiltration techniques to reduce off-site discharge of stormwater. The lead agency on a project could be required to consult with DEP's

Bureau of Environmental Planning and Assessment for advice, and to describe its compliance with this directive in any CEQR/SEQRA documentation.

- Increased use of High Level Storm Sewers is not a sustainable solution to water quality problems. Piping storm water directly into surface waters perpetuates its characterization as a waste instead of encouraging use of storm water as a resource. Untreated storm water picks up contaminants and increases in temperature before being discharged, thus threatening wildlife habitat. Those flows would be better utilized for maintaining and expanding vegetated areas around the city, which would serve the additional goals of cooling, beautifying, improving air quality, and reducing energy costs.

We congratulate you on the completion of this plan and hope to work cooperatively toward making our city more sustainable.

Sincerely,

Majora Carter
Sustainable South Bronx

Dart Westphal
Bronx River Alliance

On behalf of the S.W.I.M. Coalition partners

Ashokan Services, Inc
Bronx Council for Environmental Quality
Bronx Initiative for Energy and the Environment
Bronx River Alliance
Cook + Fox Architects
The Downtown Boathouse
Eastern Queens Alliance
Full Spectrum
Friends of Brook Park
Friends of the High Line
The Gaia Institute
Gowanus Dredgers
Gowanus Oyster Garden Stewards
Green Apple Corps
Habana Labs
Long Island City Community Boathouse
Lower East Side Ecology Center
Manhattan Island Foundation
Metropolitan Waterfront Alliance
Mosholu Preservation Corporation
Mothers On the Move
Natural Resources Defense Council

Neighborhood Initiatives Development Corporation
New York City Soil and Water Conservation District
New York Harbor School
New York/New Jersey Baykeeper
New York Public Interest Research Group
New York Restoration Project
Newtown Creek Alliance
Nos Quedamos
The Point CDC
Pratt Center for Community Development
The Redhook Boaters
Regional Plan Association
Riverkeeper
Rocking the Boat
Sebago Canoe Club
Solar 1
South Bronx Economic Development Corporation
Sustainable South Bronx
The Urban Divers Estuary Conservancy
Trees NY
Water Resources Group
Youth Ministries for Peace and Justice