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April 5, 2015  
Steve A. Watts, NYSDEC Region 2 Headquarters  
47-40 21st St, Long Island City, NY 11101



Dear Mr. Watts,

Thank you for the opportunity to comment on the revised Draft MS4 Permit for New York City, which DEC released in March 2015.

Friends of Brook Park is a leading community-based environmental organization in the South, South Bronx. We engage youth and adults in organic gardening, Community Supported Agriculture and arts and indigenous cultural events and activities that convey a deep respect for the Natural world. In addition we are strong advocates for environmental justice, waterfront access and green space development.

We lead shore clean-ups and offer canoe and kayak introductions to the Harlem River and Bronx Kill and conduct eco-education tours as far north as the Hudson River and to southern end of Randall's island and beyond. We work with numerous local organizations and schools and have helped launch the Harlem River Working Group, and art part of S.W.I.M. and the NYC Watertrail Association.

The Harlem River and Bronx Kill are severely impacted by permitted and UNPERMITTED outflows. Our Harlem River Watch program has consistently documented unpermitted outflows, often many days past from any rain activity on the Bronx and Manhattan sides as well as Randall's Island visible at low tide.

We understand that DEC and the NYC Department of Environmental Protection (DEP) have been negotiating for a year over revisions to the initial draft permit released last year. While we appreciate the effort DEC has put in to this permit, we continue to believe that it does not go far enough to protect New York City waters.

Specifically we urge the DEC to consider stronger requirements on:

- minimum size for construction sites, based on available studies and data from other metropolitan areas in the country;
- green infrastructure on redevelopment projects, right-of-way projects, and sewer and other flood management projects;
- water quality improvement with quantifiable pollutant reduction targets and timelines;
- coordination with other water quality improvement programs, including the CSO Long Term Control Plans, Open Industrial Use Study, Brownfields and others
- more meaningful public participation and involvement

We believe stronger requirements are necessary if we are truly committed to making our waters fishable and swimmable, as required by the Clean Water Act.

Thank you very much for your consideration of these comments.

Sincerely,

Harry Bubbins  
Director