

# Friends of Flushing Creek, Inc.

136-20 38<sup>th</sup> Avenue, Flushing NY 11354

*Board of Directors*

Steve Chen  
Christopher A. Gioia  
Helen Lee

*Advisory Board*

Michael Butler  
Dr. James Cervino  
Christopher Kui  
Vincent Riso

October 20, 2015

Commissioner Emily Lloyd  
New York City Department of Environmental Protection  
9605 Horace Harding Expressway  
Corona, New York 11368

Dear Commissioner Lloyd,

Re: Friends of Flushing Creek Comments on Flushing Creek LTCP Final Recommendations

Friends of Flushing a Creek is a nonprofit organization comprised of stakeholders, environmentalists and community representatives who are dedicated to ensuring the clean up of Flushing Creek. Our goal is to ensure that the creek will be a healthy waterbody that can serve as a recreational community resource.

I write today to provide comments on the proposed final recommendations for the Flushing Creek Long Term Control Plan. Fundamentally, we object to the final recommendations as they fail to address the more than 1 billion gallons of untreated sewage and storm water that is dumped annually into the waterbody. Instead, DEP proposes to chlorinate the creek during the recreation season and to develop a yet to be defined project specific and funded green infrastructure plan for the area.

As you know, the Department of City Planning is working to create a new Flushing West community along Flushing Creek. An EIS will culminate in rezoning proposals to help spur the development of much-needed affordable housing-a central goal of the Mayor's administration. Plans include waterfront access with direct links to the waterfront from downtown Flushing with open space-all geared to providing residents and visitors a positive connection to Flushing Creek. Bluntly stated, no one wants to live next to an open sewer with foul odors every low tide. Therefore, a successful plan for a thriving residential community at Flushing West must include material plans to address the CSO volumes, remove existing sediments and ensure a healthy waterfront.

As a technical note, the LTCP future use maps for the Flushing Creek waterfront do not reflect the Department of City Planning's current studies. Planning for a new community, including new housing and commercial space, must be reflected in DEP's

LTCP and contain specific plans to address the added capacity needs that will be required at the College Point Water Pollution Control Plant.

As for planned disinfection, hydrology and microbiology experts note that DEP's computer program (East River Tributary Model) cannot accurately predict pollution concentrations because it does not include sufficient groundwater inflow nor does it consider microbes resuspension or persistence in sediment. Additionally, we share the concerns of environmental experts regarding reported links between chlorine and breast and bladder cancer. The negative impacts of chlorine are also significant to the waterbody itself as chlorine is toxic to shellfish and other beneficial organisms that are needed to restore the creek's oxygen level to water quality standards. DEP has noted that data from its chlorination pilot project at Spring Creek will not be available for several years-yet it proposes to implement this same approach to Flushing Creek. We believe this is premature at best.

While planned dredging and wetland restoration are positive steps, without CSO reduction, the potential of generating a productive ecosystem is greatly diminished and represent a short sighted plan that does not maximize the use of funding or the potential of such efforts.

DEP is now in the process of developing a LTCP for Flushing Bay-an extension of Flushing Creek. Flushing Bay has a vibrant boating community whose members regularly come into direct contact with the waters of the creek and the bay. Their health and the success of a Flushing Bay LTCP are directly dependent upon a successful LTCP for Flushing Creek. Therefore, we urge DEP to withdraw its final recommendations for Flushing Creek and to instead develop a meaningful and coordinated plan that will address the unacceptable volume of raw sewage that flows into Flushing Creek and subsequently into Flushing Bay.

Sincerely,

*ALEXANDRA ROSA*