



September 30, 2020

Edward Hampston, P.E.  
New York City Municipal Compliance Section Chief  
New York State Department of Environmental Conservation  
625 Broadway, 4th Floor  
Albany, New York 12233-3500

**Vincent Sapienza**  
*Commissioner*

**Re: Order on Consent, DEC Case #CO2-20000107-8, as modified;  
Appendix A, XIV. City-Wide LTCP, A. Submit Approvable City-Wide LTCP  
incorporating the Open Waters and East River LTCPs**

**James G. Mueller, P.E.**  
*Agency Chief Engineer*

Dear Mr. Hampston:

57-19 Junction Blvd  
Corona, NY 11373

Tel. (718) 595-5973  
Fax (718) 595-3323

In accordance with Paragraph XIV.A. of the above referenced Order on Consent (CSO Order), the New York City Department of Environmental Protection (DEP) hereby submits to the New York State Department of Environmental Conservation (DEC) the Citywide Combined Sewer Overflow (CSO) Long Term Control Plan (LTCP) incorporating the Open Waters and East River LTCPs.

As has been discussed, DEP and the City of New York are in a period of fiscal uncertainty caused by the ongoing COVID-19 pandemic. Unemployment in New York City was 19.8% in July 2020 as compared to 3.9% in July 2019. Personal incomes and tax receipts have been correspondingly lower, due to job losses, wage reductions, and the loss of available work hours. As of June 30, 2020, the dollar amount of delinquent water and sewer charges outstanding was 16% higher than the year before, with 20,000 more accounts delinquent in June 2020 than in February 2020. These examples of our challenging economic realities require DEP to seek to balance mandated work with sound investment in existing water and wastewater infrastructure so that DEP can maintain affordable water rates for New Yorkers. Pending DEC's review and approval of this LTCP, DEP requests an opportunity to discuss the implementation schedule for this LTCP and certain other mandates to ensure critical and proper investment priorities for New York City.

DEP looks forward to DEC's review of the attached LTCP. Please feel free to contact me at (718) 595-5972 should you have any questions regarding this submittal.

Sincerely,

A handwritten signature in blue ink that reads 'Keith Mahoney'.

Keith Mahoney, P.E.  
Acting LTCP Program Manager

**Copy to:**

Ryan Waldron, P.E.  
Section Chief  
Bureau of Water Compliance  
Metropolitan Compliance Assurance Section  
New York State Department of  
Environmental Conservation  
625 Broadway, 4th Floor  
Albany, NY 12233-3500

Linda Allen, Ph.D., P.E.,  
NEIWPICC, CSO Project Director  
Bureau of Water Compliance  
Metropolitan Compliance Assurance Section  
625 Broadway, 4th Floor  
Albany, New York 12233-3500

Paul Buist  
Environmental Program Specialist 1  
Bureau of Water Compliance  
Metropolitan Compliance Assurance Section  
New York State Department of  
Environmental Conservation  
625 Broadway, 4th Floor  
Albany, NY 12233-3500

Joshua Lin  
Assistant Engineer  
Bureau of Water Compliance  
Metropolitan Compliance Assurance Section  
625 Broadway, 4th Floor  
Albany, New York 12233-3500

Steve Wood  
Assistant Engineer  
Bureau of Water Compliance  
Metropolitan Compliance Assurance Section  
625 Broadway, 4th Floor

Albany, New York 12233-3500

Daniel Flannery  
NEIWPCC Environmental Engineer  
NYC CSO Monitoring Program  
New York State DEC  
1 Hunter's Point Plaza, 47-40 21st Street,  
Long Island City, NY 11101-5407

Dena Putnick, Esq.  
Office of General Counsel  
General Enforcement Bureau  
New York State Department of  
Environmental Conservation  
625 Broadway, 4th Floor  
Albany, New York 12233-3500

Selvin Southwell, P.E.  
Regional Water Engineer Division of Water,  
Region 2  
New York State Department of  
Environmental Conservation  
47-40 21st Street  
Long Island City, New York 11101

Mark Klotz, P.E.  
New York State Department of  
Environmental Conservation  
625 Broadway, 4th Floor  
Albany, New York 12233-3500

Kaitlyn Penner, P.E.  
Environmental Facilities Corporation  
625 Broadway  
Albany, NY 12233-5500

**DEP Commissioner's Office:** J. Murin, M. O'Keefe  
**DEP OACE:** J. Mueller, K. Mahoney, G. Mayes, H. Chanilal  
**DEP BWT:** P. Elardo, D. Katehis  
**DEP BEDC:** A. Barrio, K. Moriarty  
**DEP BEPA:** A. Licata; P. Balci  
**DEP BPAC:** M. DeLoach, M. Adgate  
**DEP BLA:** E. Cushman, M. Eckels, E. Callahan, M. Ruderman, R. Koenig  
**NYC Law:** W. Plache, D. Goodrich  
**LTCP Team:** D. Walker, A. Boulet, P. Young