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

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

Dear Mr. Hampston:

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,

Keith Mahoney, P.E.
Acting LTCP Program Manager
Copy to:

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