

March 8, 2007

Mr. Daniel Doctoroff
Deputy Mayor for Economic Development and Rebuilding
City Hall
New York, New York 10007

Re: PLANYC 2030

Dear Deputy Mayor Doctoroff:

On behalf of the Jamaica Bay Watershed Protection Plan Advisory Committee (“Advisory Committee” or “Committee”), we are writing regarding the “PLANYC 2030,” the Mayoral initiative for a sustainable New York City in 2030. As you may know, the Committee was created by Local Law 71 to advise the Department of Environmental Protection (“DEP”) in its preparation of a comprehensive Jamaica Bay Watershed Protection Plan (“Jamaica Bay Plan”). In addition to the two co-chairs, Brad Sewell, NRDC, and Doug Adamo, Gateway National Recreation Area, the Committee’s members are Manny Caughman, Community Activist; Len Houston, U.S. Army Corps of Engineers; Dan Mundy, Jamaica Bay Eco Watchers; Dr. R. Lawrence Swanson, Stony Brook University; and Christopher Zeppie, The Port Authority of New York and New Jersey.

It is the Committee’s understanding that the PLANYC 2030 will include initiatives aimed at protecting and restoring the City’s waterways. In the Committee’s view, there is no waterway in the City more important than Jamaica Bay – in other words, a plan to ensure a sustainable New York City in 2030 must include a plan to save Jamaica Bay. The Bay is part of the national park system and a national wildlife refuge. Its more than 25,000 acres of open water, marsh, meadowland, beaches, dunes and forests provide critical habitat for more than 80 fish species and many threatened and endangered species, such as the Atlantic Ridley sea turtle. Jamaica Bay is considered one of the best bird-watching locations in the western hemisphere; it is a key stopover along the Eastern Flyway migration route and is visited by nearly 20 percent of the continent’s species of birds every year. The Bay’s wetlands also serve as flood protection and shoreline erosion control for the surrounding homes and businesses in Brooklyn and Queens. More than five hundred thousand New Yorkers live in the Jamaica Bay watershed/sewershed, and the Bay is a popular fishing and boating area serving all parts of the city, as well as tourists seeking recreational opportunities.

Nevertheless, despite its exalted status and ecological importance, the Bay is plagued by poor water quality and algal blooms, as well as extensive degradation and alterations to its natural shoreline, tributaries, Bay bottom and related habitats. In particular, the Bay’s vital salt marshes are eroding at an alarming rate. Indeed, scientists estimate that if the current rate of loss continues unabated, the marshes will all be gone in two decades, or by PLANYC 2030’s target date.

Given the City's interest in protecting and restoring Jamaica Bay, the Committee would like to make two specific recommendations regarding the PLANYC 2030. First, it is the Committee's understanding that the PLANYC 2030 may include strategies to increase the City's use of so-called stormwater "best management practices" ("BMPs"), including through development of a comprehensive BMPs strategy to be implemented by all City agencies. The Committee is very supportive of such an initiative. Future progress in improving the City's water quality, including in Jamaica Bay, will require a solution to the City's massive combined sewer overflow problem and improved stormwater management in general will help address this problem. Such solutions will only be achieved through a long-term "remaking" of the City's infrastructure and building envelopes, and ultimately require the concerted participation of multiple City agencies, and not simply DEP. To best assure the success of this planning process, the Committee recommends that, when it is released this spring, the PLANYC 2030 itself set out specific deliverables for the comprehensive BMPs plan. Moreover, the PLANYC 2030 should include at least narrative performance standards concerning runoff reduction that would immediately apply to all new City projects, while the comprehensive BMPs plan is in development.

Second, the Committee strongly recommends that the PLANYC 2030 include a commitment to address the City's nitrogen pollution into Jamaica Bay. Nitrogen from the City's sewage treatment plants is of serious concern not only because it is the Bay's chief water pollutant, but also because it may be playing a prominent role in the marsh loss. The City has committed to a relatively high standard in stemming nitrogen pollution into western Long Island Sound – in the Committee's view, the City should make the same or a greater commitment to stopping the same pollution into Jamaica Bay, an irreplaceable wildlife refuge situated wholly within its own borders.

As we are sure the Mayor agrees, the City is extraordinarily fortunate to have Jamaica Bay within its boundaries. The Committee very much hopes that our common interest in preserving this tremendous natural resource is reflected in the PLANYC 2030. Thank you in advance for considering our views.

Respectfully yours,

A handwritten signature in dark ink, appearing to read "Brad Sewell", with a stylized flourish at the end.

Brad Sewell
Jamaica Bay Watershed Protection Plan Advisory Committee Co-Chair
Senior Attorney, NRDC

A handwritten signature in dark ink, appearing to read "Doug Adamo", with a stylized flourish at the end.

Doug Adamo
Jamaica Bay Watershed Protection Plan Advisory Committee Co-Chair
Chief of the Division of Natural Resources at Gateway National Recreation Area

cc: City Council Member James F. Gennaro
Rohit Aggarwala, Director of the Office of Long-term Planning and Sustainability,
Mayor's Office of Operations
Angela Licata, Deputy Commissioner for the Bureau of Environmental Planning and
Analysis, Department of Environmental Protection