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Jeremy Rosenthal
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RE: Comments on the Haverstraw Water Supply Project Draft Environmental Imp act Statement

Dear Mr. Rosenthal,

I'd like to preface my comments with statements from the United States Environmental Protection watershed website home page:

"We all live in a watershed -- the area that drains to a common waterway, such as a stream, lake, estuary, wetland, aquifer, or even the ocean -- and our individual actions can directly affect it. Working together using a watershed approach will help protect our nation's water resources .

A watershed approach is the most effective framework to address today's water resource challenges. Watersheds supply drinking water, provide recreation and respite, and sustain life. More than $450 billion in food and fiber, manufactured goods, and tourism depends on clean water and healthy watersheds.

A watershed approach is: hydrologically defined, geographically focused, includes all stressors (air and water), involves all stakeholders, includes public (federal, state, local) and private sector, is community based, includes a coordinating framework,strategically addresses priority water resource goals (e.g. water quality, habitat) , integrates multiple programs (regulatory and voluntary) based on sound science, is aided by strategic watershed plans, and uses adaptive management."

Understanding that the United States Environmental Protection Agency and the New York State DEC both recognize the need to support the watershed approach to water supply management, I respectfully request that the public commentary period on the Haverstraw Wa ter Supply Draft Environmental Impact Statement be reconvened at a future date, and that the written commentary period be extended in order to:

(a) provide proper notification of all watershed municipalities throughout our regional watersheds which provide water not only to Rockland County but also to parts of Orange County, NY and parts of northern New Jersey.

Proper notification should also be given to the New Jersey Department of Env ironmental Protection, the US Department of the Interior (the federal agency administering the National Heritage Area program, of which the proposed desalination plant site and the Hudson River itself is a part), as well as all Hudson River Towns, the Hudson River Fishermen's Association and

other recreational, history-based and environmental, and watershed organizations such as the Ramapo River Watershed Intermunicipal Council, Ramapo River Committee, Sterling Forest Partnership, Hackensack Riverkeeper, Bergen Swan, West Branch Conservation Association, the Highlands Coalition, Hudson River Watershed Alliance, Hudson River Valley Institute,etc. …

and

(b) to provide time to hear from all municipalities, residents and stakeholder organizations as mentioned above.

Additionally, I respectfully request that the Haverstraw Water Supply Project Environmental Impact Statement address the following :

A. The EIS must show accurate measurement of regional groundwater and surface water availability from the perspective of each of the region's watersheds (not just Rockland County per se, as in the USGS Study)

B. In addition to other alternatives to a desalination plant, the EIS, must also take into account the availability of long term wate r supplies in the New Jersey portions of our shared watersheds that might alleviate the necessity of supplying New Jersey with water fr=2 0om Rockland water reserves, with a goal of balancing water use and management across our regional shared watersheds.

C. Using these studies and any others as necessary, the EIS should take a regional watershed management approach to offering the alternative of NOT building a desalination plant. The EIS must measure the need of a desalination plant against the backdrop of surface and groundwater availability across our shared regional watersheds.

Aspects to consider should include operating under best watershed management practices of conservation, storm water management, green-building practices, siting of development to avoid environmentally sensitive areas such as wetlands, water-rich recharge lands and wildlife habitats; and regional data-sharing and planning cooperation among watershed municipalities as exemplified in the goals and initiatives of the Ramapo Watershed Intermunicipal Council (www.ramapowatershed.com)

Water knows no boundaries and watershed planning and management must take every part of our watersheds into consideration. The desalination proposal, as presented, *does not measure the need of a desalination plant in Rockland against the backdrop of surface and groundwater availability across our shared regional watersheds.*

Rockland County partially contains three regional bi-state watersheds:The Ramapo-Mahwah, Saddle River, and the Hackensack. The Ramapo-Mahwah spans Orange County, drops through Rockland and extends to southern Bergen County and a small portion of Passaic County, NJ. The Saddle River and Hackensack rise in Rockland County and extend into the lower reaches of Bergen County.

Since our water supply is a shared regional resource, we all drink from the same water supply, here on the NY-NJ border – whether we live in Rockland, Bergen or the Ramapo Watershed portions of Orange County.

I therefore also respectfully request that the EIS also:

1. Examine NY-NJ state laws and water-release *regulations* that may need updating in order better to balance water delivery,

2. Create a plan that fairly balances *supply, development of new sources, and infrastructure improvements* at the watershed level, across all government jurisdictional boundaries, so that rate payers and stakeholders throughout our shared watersheds have a shared voice in our water-destiny and a shared voice with regard to rate-hikes and water supply proposals such as this desalination plant proposal, which will have an effect on water users in New Jersey and in Orange County New York, as well as Rockland residents:

As an example in New York:

The EIS should examine the potential effect of a new 7.5 MGD water supply in Rockland, facilitating devel opment of Tuxedo Reserve in Orange County -- the largest development ever proposed in Orange County history. The proposed Tuxedo Reserve anticipates over 1,000 units of housing and over 30,000 square feet of commercial development, along with enlarged school facilities.

Will extra water coming into the United Water delivery infrastructure system from a desalination plant in Haverstraw effectively "free-up" more water to be withdrawn from the USEPA-designated Ramapo River Watershed Sole Source Aquifer to facilitate the Tuxedo Reserve development?

Since this challenged, sole source aquifer already provides over 30% of the water delivered to Rockland County residents (and the Rockland County Health Department questions its future capacity to provide water for new users), perhaps the Tuxedo Reserve development would not be p ossible without a separate, new supply source for Rocklanders? This question must be examined in the EIS, as part of the regional watershed-based studies requested in items A, B, and C of these comments.

As another example, in New Jersey:

Currently the Ramapo River provides water to over 2 million New Jersey residents downstream from Rockland County.

If the desalination plant takes enough pressure off providing water to Rockland residents from the Ramapo watershed in order to supply the Orange County Tuxedo Reserve development -- what effect will the new withdrawals in Orange County have on New Jersey residents downstream? Again, this question must be answered as part of the regional watershed-based studies requested in items A, B, and C of these comments.
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3. Provide studies that show what our NY-NJ regional water supply *infrastructure carrying quantity* really is, and how water delivery may be better balanced among stakeholders and United Water ratepayers within our shared watersheds -- in conjunction with potential changes in NY-NJ state laws and water-release regulations as requested in item (1) of this document, and in conjunction with information requested i n item (2) of this document.

4. Show a determination of the total regional *sustainable supply of ground and surface water* within our shared watersheds that could be accessed -- over time -- for use, recovery and

recharge, taking into account all users within our shared watersheds -- not just UW ratepayers -- while maintaining healthy wildlife, wetlands and landscapes. *Knowledge of our total ground and surface water reserves would allow decision makers to create a water budget with a goal of regional sustainability.*

5. Show what regional effects the desalination plant water withdrawals from the Hudson River and the ensuing residual waste products will have on the Hudson River, and News Jersey residents, downstream -- with regard to recreation, fishing, etc.

To quote from the New York State DEC website page titled "Watershed Management": *"What you do at your house affects everyone downstream and around you. We all need to work together to preserve and protect our watersheds."*

I have a question: if the New York Department of Environmental Conservation experts are right in their published statement that --- *what I do at my own house affects everyone downstream and around me* --- how would a huge water-change like this proposed desalination plant and its attendant operations (energy and waste processes, etc) affect everyone downstream and around it?

Therefore, by the NYS DEC's own reckoning, with regard to watershed impacts "downstream and around", we must allow time to include New Jersey stakeholders, Hudson River towns in the estuarial region, as well as Orange County, NY in the review and discussion of the proposed Haverstraw Water Supply Project.

And in order to meet both NYS DEC and USA EPA criteria for best water supply management, we must engage in regional watershed management.

United Water's proposal to build a desalination plant must include an alternative long term water supply plan based on best management solutions from a *regional watershed perspective*, with participation and coordination among local, regional and state municipalities and agencies.

In the final analysis -- by balancing our regional water supply across state borders to include all the regional stewards and stakeholders as partners in best watershed management practices -- we may find an that the alternative of a *naturally sustainable water supply managed at the watershed level, is preferable to the expense, burden and potential negative impacts of a local desalination plant.*

Thank you for consideration of these points.

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www.ramapowatershed.com