

SPACE

STONY POINT ACTION COMMITTEE FOR THE ENVIRONMENT

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May 22, 2009

Subject: UWNY Scoping
Re: Haverstraw Water Supply Project

Second Submission - revised

These scoping questions are in addition to the ones that we submitted and hand delivered at the Public Scoping Session at Haverstraw Town Hall on May 7, 2009.

Conservation and water management vs. need for additional water supply:

WATER CONSERVATION PROGRAMS

United Water is a private company and does not have the regulatory authority to mandate or enforce water conservation by consumers. The company is thereby limited in its ability to rely on conservation as a means to reduce demand or increase available supply. (Preliminary DEIS 18-6)

QUESTIONS:

- How would more energy and water efficient “smart growth” water management and preservation in Rockland County mitigate the need for the additional supply anticipated from this proposed desalination-filtration plant?
- Does New York State have regulations to require that United Water or another entity monitor the percentage of water loss in the system with fines for non-compliance?
- What regulatory changes in building codes and land use regulations could be implemented to mitigate the need for additional supply anticipated from this proposed desalination-filtration plant?
- How will you make use of the data from the yet to be complete, USGS Rockland County Groundwater Study, which is expected to be available in December 2009?
- What are the potential benefits and savings in terms of both water resources and capital expenditure if a more progressive and comprehensive water conservation program were implemented in Rockland County – including, but not limited to water-efficient appliances, rain water capture, cisterns and grey water retention and reuse for all new construction, as well as incentives to retrofit existing construction?
- What NY State regulations could be introduced to reduce water use and water peak demand?
- What is the potential of aquifer recharge as a mitigation measure to increase groundwater resources?

The Unavoidable Annual Real Losses (UARL) for United Water in 2007 was 777.45 million gallons per year, or 2.13 mgd. This is approximately half of the 1,521.4 million gallons (4.17 mgd) of real losses in the United Water system annually. (Preliminary DEIS 18-5)

QUESTIONS:

- United Water states that it loses approximately 2 million gallons a day due to leaks in the system. How many gallons per day could be realistically saved each day if United Water practiced better water management and invested in repairs or replacement of its failing infrastructure?
- How would improved management of United Water's infrastructure and distribution system mitigate the need for the additional supply anticipated from this proposed desalination-filtration plant?
- The DEC had fined United Water for exceeding their permit allocation for excess removal of water from the Lake Deforest Reservoir. What safeguards is the DEC going to institute to make sure that United Water is more accountable and does not continue to remove more than the allowable volumes of water from this reservoir system?
- United Water made infrastructure connections to the Letchworth Reservoirs and pipes leading into Harriman State Park. Where is that water going?

LAND USE POLICES – RESULT IN FLOODING AND WASTED WATER RESOURCES

In the early 1990's, the Town of Stony Point had approved new residential developments on steep slopes in the Route 210 corridor that have since caused flooding and drainage problems for homeowners and downgrade neighbors due to improper land use planning, drainage, construction and oversight. The erosion caused siltation in the Cedar Pond Brook, a certified trout stream and tributary to the Stony Point Reservoir on Reservoir Road. Constant clogging of the water filter and pumps at the reservoir, lead the water company to close the facility – removing a water source in North Rockland.

In the year 2008, the Town of Stony Point now suspects that the homeowners in these same developments, have since illegally connected their gutters, downspouts and sump pumps into the town sewer system in order to solve the flooding problems that town government never addressed during the planning of the subdivision – resulting in not only a tremendous waste of potential grey water reuse, but also in tremendous expense to the town taxpayers and the environment -- overwhelming the capacity of the Haverstraw Joint Regional Sewer Plant as it processes large volumes of stormwater mixed in with the sewage.

QUESTIONS:

The scenario above clearly illustrates that in order to address Rockland's water supply needs, residents and policymakers must take responsibility for a comprehensive approach to water management that treats water as a valuable resource and includes conservation and thoughtful land use planning to protect and control the resource, rather than allowing builders or corporate interests to drive land use and water policies.

- How can the new New York State MS4 regulations improve past practices by reducing stormwater and mitigate the need for additional supply anticipated from this proposed desalination-filtration plant?

POTENTIAL GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

In the future with or without the Proposed Project, the projected population growth in Rockland County will create an additional demand on infrastructure, including water supply.

The demand for water is increasing as the County's population increases, and the existing water supply system has limited ability to provide the additional water needed over the long-term to meet the projected demand. Projections for future water demand over the next two decades indicate that within that timeframe, the demand for water will outpace the available supply if no new water supply is developed. (Preliminary DEIS; 20-1)

Future projected demand: 15,540 new connections between 2008 and 2025 (Preliminary DEIS; 1-12)

QUESTIONS:

The statement “Potential Growth-Inducing Impacts” above presupposes that growth is inevitable and drives the need for more water without recognizing the inverse – that greater water supply generates more growth potential and lessens the need for conservation.

A new desalination plant will encourage more over building and increased population that is unsustainable and that the people of Rockland cannot afford – improved roads, utilities, schools and higher taxes.

- What are the direct and indirect projected costs to Rockland taxpayers and utility ratepayers for a predicted 15,540 new connections in Rockland County during the next 17 years?
- How much will the proposed desalination plant construction and operation cost the ratepayers of United Water, and the taxpayers of Haverstraw and Rockland County, considering all costs – direct and indirect for construction and operation. How much will the water rates increase?

HVERSTRAW JOINT REGIONAL SEWER PLANT

QUESTIONS:

- How old is the joint regional sewage treatment plant and how many times has it overflowed and exceeded its capacity? How many spills has it had?
- A study is necessary to determine if the Joint Regional Sewage Plant is actually capable of processing the waste from the proposed Desalination Plant, especially the waste created by the Indian Point Nuclear Power Plant?
- The Town of Haverstraw recently allocated \$1.8 million to make improvements to the joint regional plant. How much more is needed to directly or indirectly fund the plant to allow additional capacity necessary for processing waste from the proposed desalination plant?
- Is the “real cost” for construction of the proposed desalination plant being considered including all the direct and indirect costs needed for upgrading the joint regional sewer plant?

ENERGY USE

QUESTIONS:

- Where will the “power” for the proposed Desalination plant come from- who will be responsible for paying for the upgrades to ensure that there will be enough power in the area to serve the needs the plant and the residents of Rockland County?
- Is the infrastructure that O&R has in that area adequate (ie: the pipes and wires in the ground now) to power a desalination plant?
- What are the increased energy use and carbon emissions of the proposed plant? Are green alternative energy sources being considered? How do these carbon emissions compare with the alternatives?
- Is additional power necessary? Who is going to build the power plant?

POTENTIAL CONTAMINATES

QUESTION:

- What impact would the leaching of Mirant coal ash pile in Tomkins Cove, about one mile north, have on the quality of the water at the intake pipe of the proposed desalination plant?

30-DAY EXTENSION REQUEST FOR SCOPING SUBMISSIONS

In speaking with many Rockland residents and public officials about this proposed desalination – filtration plant over the past several weeks, I have realized that many were not aware of the scoping process and the details of the preliminary DEIS. In addition, many elected officials said they were not notified. In the interest of knowing that the public and elected officials have been given an opportunity to participate in this important scoping process, we respectfully ask that the Department of Environmental Conservation consider extending the scoping period by 30-days beyond the May 22 deadline.

We thank the Department of Environmental Conservation for holding the public scoping session and comment period -- and for your consideration of these questions.

Sincerely,



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File: UWNY_Scoping-SPACE-090522a