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Martyn Ryan
Rockland County Sierra Club Water Resource Committee
153 Hudson terrace
Piermont
NY, 10968

Subject: UWNY Scoping
Re: Haverstraw Water Supply Project Submission

Dear Sir,

Please enter into the record the following scoping comments for the proposed United Water (Suez), Water Treatment/Desalination plant for Rockland County. The scoping comments are made on behalf of the Rockland County Sierra Club.

The scope of the DEIS should contain analysis of the root causes of alleged water deficiency in Rockland County and the ability of this proposed solution to remedy or potentially exacerbate those root causes. Root causes could include over-development, inadequate management, leaks, inadequate storm-water management, illegal discharges etc.

The scope of the DEIS should include analysis of the water demand projections of both Rockland County and United Water and outline the assumptions/basis included in the estimates.

The scope of the DEIS must include a thorough assessment of the following no action alternatives:

- What is the potential for water efficiency improvements in Rockland County compared to best practice?
- What is the potential for mandatory water management regulations to decrease peak and maximum day demand?
- What is the potential for reducing leaks in existing infrastructure?
- What water management regulations are currently in place in Rockland County to promote efficiency. What options are available to public authorities to mandate regulation of water usage to reduce the demand in Rockland County. Public authorities would include local governments, Rockland County and NY State Department of Health, NY State Public Service Commission. The analysis should

include review of best practice in Water Resource management and regulation (e.g. California, Austin (Texas)).

- What is the cost of water efficiency measures and improved water management versus new water supply?
- What are the positive impacts of water efficiency and improved management versus the negative impacts of this proposed new water supply?
- What is the potential impact of a multi-tiered water rate system discourage wasteful use of water particularly during high usage months?

The scope of the DEIS needs to include an analysis of other alternatives for new water supplies:

- The alternative option of providing reclaimed water from waste-water/storm water for use in agriculture and other grey water uses. How much water could be produced in this way?
- Treatment of wastewater as alternative source for recharging the aquifer as is proposed for Ramapo?
- The analysis of alternatives should include an analysis of costs between these alternatives and the proposed desalination plant.

The scope of the DEIS should include an analysis of Water Quality:

- Detailed and independent water quality survey over a sufficient period of time as specified in NYS regulations of the water quality in the Hudson River in this region. 10 years is suggested in NYS regulations subpart 5.
- The scope of the DEIS should include an analysis of all current discharges into the river, upstream and downstream of the intake site (based on tidal and freshwater flows) as is required in NYS regulation subpart 5 governing new water sources.
- Analysis of the impacts of accidental spill, discharge on water quality and the proposed facility should be included as specified in NYS regulation for new water sources.

The scope of the DEIS should include a detailed discussion of the impact of the new facility on the Haverstraw Joint Regional Sewage Treatment Plant (JRSTP). Assessment should include analysis of:

- Direct impact of the project on the existing capacity of the plant. Reduction in future expansion capability in the plant.
- Age and future life of the existing facility. What upgrades may be required by the time of full build out and what are the costs.
- Impact of increased costs of waste treatment.
- Ability of the plant to treat the waste streams. Are upgrades required and at what cost.
- Impact of waste streams on current composting practices at the plant.
- Impact of the project waste streams on the existing NPDES permit for the plant.
- Impact of brine integration into the outfall flow.
- What is the impact of the liability associated with potential non-compliance discharges resulting from the new waste streams being transferred from the

proposed Desalination Plant/Private Company to the Haverstraw JRSTP/Municipal facility? What are the potential costs associated with this and potential long term risks for long term impacts?

The scope of the DEIS should include an analysis of:

- What is the impact of Radionuclides in the river discharged from Indian Point. Is there any required involvement of the Nuclear Regulatory Commission in regulating the capture, concentration, disposal and possible presence of untreated/low levels of radioactive materials released from Indian Point in public drinking water supply?
- What is the impact of reclassifying Hudson River in this area as drinking water source? What impact does this have on existing EPA NPDES discharge permits within the re-classified area? Specifically how does this affect the discharge licensing of Indian Point power plant and its' current discharge license.

The scope of the DEIS should include analysis of the final report of the Rockland County Water-Resource Assessment by the United States Geological Society.

The scope of the DEIS should include analysis of Hazardous Materials:

-What is the potential impact of generation of hazardous wastes from the new facility? What will be the composition, quantities and disposal issues? How will solid hazardous wastes be disposed?

What is the combined costs of treating and disposing of this hazardous waste?

The scope of the DEIS should include a detailed analysis of the effect of Waste brines discharged from the proposed facility on the Hudson River marine estuary. This should include an analysis of endangered fish population species, flora and fauna etc.

The scope of the DEIS should include analysis of the impact of the cumulative effect of all discharge and intakes in this region on the Hudson River natural environment.

The scope of the DEIS should include analysis of the green house gas emissions of the proposed plant.

The scope of the DEIS should include the impact of Global Warming/Sea level rise on the operation of the plant.

The scope of the DEIS should include the following analysis of Environmental Justice issues:

- Analysis of the environmental justice of continued and cumulative environmental damage resulting from inefficient water use demand promoted by this project as against increase in efficiency no action alternative. Is it just to continue to exploit and further pollute the Hudson River while failing to implement efficiency measures in existing water supplies?
- Environmental justice of the increased water rate costs to all Rockland County residents of proposed water relative to alternatives.

- Environmental justice of depending on a highly complicated, inefficient, costly engineered solution for providing drinking water from a drinking water source which is being continuously polluted from current discharges.

The scope of the DEIS should include analysis of Future Development:

- Environmental effects of over development from developing the county beyond its natural resource limits.
- The impact of the land designated for the Ambrey pond reservoir becoming available for development.

The scope of the DEIS should include analysis of the impacts of this proposal under worst-case scenario conditions as is required by NYS regulations for engineered solutions. The DEIS must establish this worst-case scenario.

The scope of the DEIS must include an analysis of the capacity of this plant to deal with the wide range of contaminants and the wide variation in concentrations within the Hudson River estuary. This analysis should include tidal influences, seasonal influences, and concentration levels – how will this be monitored and controlled.

The scope of the DEIS should include analysis of all water releases – intentional, leaked, poor management from Rockland County reservoirs/water sources to New Jersey/out of watershed.

The scope of the DEIS should include analysis of the potential that this proposed facility would remain idle and be underutilized if potential water efficiency measures were implemented in parallel in Rockland County resulting in lower predicted demand.

Yours sincerely,

Martyn Ryan