

SPACE

STONY POINT ACTION COMMITTEE FOR THE ENVIRONMENT

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Michael Gurski, Chairman
Town of Haverstraw Planning Board
One Rosman Road
Garnerville, NY 10923

FINAL DRAFT

Subject: Public Hearing: United Water Pilot Desalination Plant

August 19, 2009

**Re: Preliminary and Final Site Plan Approval
United Water Intake and Pumping Station**

Dear Mr. Gurski,

I am here tonight as President of the Stony Point Action Committee for the Environment (SPACE) and as a member of the Rockland Coalition for Sustainable Water. I appreciate the opportunity to provide comments to the board concerning this proposal and submit the following for your consideration:

- 1. The SEQRA Type II designation, by the NYSDEC, indicates that this pilot plant will engage in a temporary activity that is time based. The DEC is allowing, in this case, a segmented SEQRA review of the pilot plant for the purpose of collecting data necessary for the Draft Environmental Impact Statement (DEIS).**
- 2. We believe that any resolution for approval of this pilot plant, issued by this Planning Board, should indicate such time limits in the resolution.**

“The pilot desalination plant is being proposed only to gather data in support of the design, regulatory applications and the draft EIS for the proposed LTWSP, and the pilot desalination plant is a temporary activity which is proposed to operate for no more than twelve to eighteen months.”

Source: NYSDEC letter from Ms. Betty Ann Hughes, DEC environmental permits (1/26/09)

A temporary pilot intake and desalination operation will be constructed and operated for a 12-18 month period to gather data in support of design and operation assessments and decisions.

Final Scoping Document, UWNH Haverstraw Water Supply Project- (1/29/09)

- 3. If the pilot plant goes forward, that does not mean the desalination plant will go forward.**

“..The Type II classification of the proposed pilot desalination plant, and the integration of the pilot desalination plant’s operational results and data into the draft EIS and SEQR public review process for the proposed LTWSP, does not commit the DEC to commence, engage in or approve the proposed LTWSP.”

Source: NYSDEC letter from Ms. Betty Ann Hughes, DEC environmental permits (1/26/09)

- 4. United Water’s site selection for the water intake pipe in such close proximity to a number**

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industrial and municipal wastewater discharges and the quality of the water it draws from the river are being questioned by the public and have been included in the final Scoping document by the DEC (6/29/09).

Therefore, United Water must address existing water quality of the Hudson River, and the effects on that water quality at the intake pipe from relevant industrial or municipal wastewater discharges and potential water contamination from other relevant activities within a 25-mile area including:

- a. The impact of groundwater flow from the closed Haverstraw landfill
- b. The ongoing operation and dredging at the USG plant
- c. Upstream dredging of PCBs
- d. Potential contamination from closed or operating power plants including Indian Point, Lovett and Bowline.
- e. Agricultural or landscaping operations adjoining the shoreline and storm drain discharges.

Source: Final Scoping Document, UWNY Haverstraw Water Supply Project- 6/29/09

- 5. Will the proposed desalination pilot plant operate under identical conditions to that of the proposed full scale desalination plant (LTWSP) and render data that is identical and representative of real life operational data?**
- 6. Request that all testing data, not just selected test data collected by United Water, be made available for public inspection.**

The data collected by United Water can yield important information concerning the health of the river. While the collection of certain data is required by the NYSDEC as part of the SEQRA review and completed DEIS, all data should be made available for public review.

- 7. As of this date, has United Water submitted a complete application to the NYSDEC for this proposed pilot plant?**

It is my understanding that as of 8/17/09, the NYSDEC has not received a complete application from United Water. An approval tonight would, therefore, be premature if the applicant has not received the necessary permits from state or federal agencies, based on scientific evidence from the scoping process. The town would not have access to the expertise that the state will have and, in this case, the environmental review and details have not been fully vetted.

- 8. Extension of the public hearing public comment period**

We request that the Town of Haverstraw Planning Board keep the public hearing comment period open until United Water has fulfilled its responsibility to submit required complete applications and that information is available to this board and to the public.

- 9. Rockland Coalition for Sustainable Water:**

Approximately 12 local and regional environmental and civic organizations have formed the Rockland Coalition for Sustainable Water and have submitted a total of 24 letters to the NYS Department of Environmental Conservation during the recent public scoping process that ran from May 7 – May 22, 2009. The coalition created a 129-page report, which contains a compilation of these letters – many comments from which were included in the final scoping document prepared by the DEC.

By enlarge, the coalition's report stresses the need for the County of Rockland to first examine its water use and policies, better manage and conserve its current water resources, improve its land use policies that lead to flooding problems and wasteful water practices. At the same time, United Water needs to be held more accountable for maintenance of its infrastructure, water lost in the system, lack of real water conservation policies and excessive transfers of water to NJ.

Let's evaluate the need before we consider paying excessively higher rates and energy costs for water that we may not need. Promises of increased rateables for Haverstraw and the North Rockland School system have to be accurately evaluated against the increased costs for processing water tied to ever higher energy costs and the resulting higher municipal and sewer costs that come with increased overdevelopment as well as the questionable health effects of drinking processed Hudson River Water. Let's get the facts straight before we make such an important decision that will affect all Rockland County residents and businesses.

For the record, I would like to submit a copy of our 129-page report for your review.

Source: Rockland Coalition for Sustainable Water Scoping Report (6/25/09)

Sincerely,

A handwritten signature in black ink that reads "George Potanovic, Jr." The signature is written in a cursive, flowing style.

George Potanovic, Jr.
President, SPACE