

March 9, 2015

Tim Miller Associates  
Attn: Tim Miller  
10 North Steet  
Cold Spring, NY 10516

“Kiryas Joel Draft Scope DGEIS Comments”

I question the application not being signed by the applicant & dated under Verification. It appears illegitimate without a signature.

Water is scarce in the area. Kiryas Joel Water Supply- Mountainville pump station—Application ID: 3-3399-00065/00001 proposes to pump up to 612,000 gallons/day adjacent to Woodbury Creek & transport it 13 miles to the Village. Village of Woodbury has 3 new... not on-line wells with potential for approximately 482,400 gallons/day on the Woodbury Creek Aquifer. Highland Sand & Gravel in 2014 stated before Village of Woodbury Planning Dept. they are allowed to withdraw 3.5 million gallons/month from the Woodbury Creek now. They are applying to withdraw 40,000 gallons/month more. The Woodbury Creek is a trout spawning water & I believe it's the only 1 in South Eastern NY. This will deplete Woodbury & Moodna Creeks water flow & impact wells, fishing, & wild life including endangered timber rattle snakes & cricket frogs. (See attached Moodna Creek Watershed Intermunicipal Council letter to R. Scott Ballard NYSDEC Region.)

According to U.S. Census data population doubled in 10 years. This should be considered in base line estimate. Estimated population growth is false. Average family size is 6; with 14 per family not uncommon. If annexation is allowed zoning will change to multifamily being primary. This is traditional zoning.

This is a regional issue. Medicaid usage of 93% of residents of Kiryas Joel is costly to Orange Co. tax payers. With current population growth rates costs are not sustainable. Last year County bond ratings were cut twice due in part to massive increase in Medicaid costs in Kiryas Joel.

Sewage: The Ramapo River cannot sustain an increase in waste water discharges. Nor can current sewer treatment plants in Harriman & Kiryas Joel. The Kiryas Joel plant discharges to an area in Monroe...The Friedman Homes that is prone to severe flooding. Kiryas Joel has many wells in that flood plain.

Coronet Lake I believe is water quality impaired. Lake had plentiful crappie, bass, perch years ago. It is no longer fishable due to vegetation.

Thank you,

Matt Higgins  
66 Highland Woods Blvd.  
Highland Mills, NY 10930

# Moodna Creek Watershed Intermunicipal Council

c/o Orange County Water Authority  
99 Main Street, Goshen, New York 10924  
(845) 615-3868

[http://waterauthority.orangecountygov.com/moodna\\_council.html](http://waterauthority.orangecountygov.com/moodna_council.html)



March 22, 2013

R. Scott Ballard  
NYSDEC Region 3 Headquarters  
21 South Putt Corners Rd  
New Paltz, NY 12561  
[r3dep@gw.dec.state.ny.us](mailto:r3dep@gw.dec.state.ny.us)

Re. Comments on Village of Kiryas Joel Water Supply Permit Application for Mountainville Pump Station -- Application ID: 3-3399-00065/00001

Dear Mr. Ballard,

We are writing today to relay concerns about the above-referenced project and to request that your Department hold an adjudicatory hearing on the application. We believe that substantial negative impacts could occur within the Moodna Creek Watershed as a result of the water withdrawals from the proposed project and that such impacts, some of which we outline below, were not adequately addressed during the SEQR review process.

Our primary concerns with the proposed project include its potential to reduce stream flows in both the Woodbury and Moodna Creeks and to diminish quantities of available groundwater in nearby areas of the Moodna Creek Watershed. The Village of Kiryas Joel (the Village) proposes to pump up to 612,000 gallons/day (gpd) from a sand and gravel well located adjacent to the Woodbury Creek and transport it over 13 miles to the Village, whose sewage treatment plant discharges into a tributary of the Ramapo River. This proposed scenario would result in an interbasin transfer of water from the Moodna Creek Watershed into New Jersey's Passaic River Watershed, of which the Ramapo River is a major tributary. Such a substantial net loss of water from the Moodna Creek Watershed would quite possibly diminish stream flows in the Woodbury and Moodna Creeks to the point of impacting ecological, recreational, and aesthetic values. The net loss could also negatively impact the yield from nearby wells.

Separate research projects completed by the Chazen Companies and by Cornell University professor Mark Bain indicate that the stream flow volumes in the Moodna Creek Watershed may already be at diminished levels. A report (attached) from Chazen Companies' Russell Urban-Meade for the Orange County Water Authority, a Council member, states that "The Moodna watershed appears to be an unusually dry watershed compared to other watersheds." Mark Bain (see report at [http://www.orangecountygov.com/filestorage/124/1362/4665/Environmental\\_Accounting\\_for\\_Sustainable\\_Water\\_Management.pdf](http://www.orangecountygov.com/filestorage/124/1362/4665/Environmental_Accounting_for_Sustainable_Water_Management.pdf)) concluded that "there is adequate, but not plentiful, water resources in the Moodna Creek watershed to meet current human and environmental needs." A further reduction in stream flow in the Moodna Creek

## Executive Committee

Town of Blooming Grove

Town of Chester

Village of Chester

Town of Cornwall

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Hampdenburgh

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Town of Warwick

Village of  
Washingtonville

Town of Woodbury

Village of Woodbury

Orange County Water  
Authority

Non-Municipal  
Members

Black Rock Fish &  
Game Club

Black Rock Forest

New York Natural  
History Council

NY/NJ Trail  
Conference

Orange County Land  
Trust

Orange County  
Federation of  
Sportsmen's Club

Palisades Interstate  
Park Commission

Preservation Collective

John Mickelson

Dick Manley

Kate Ahmadi

Ed Butler

Friends of Walton Lake

Watershed could have profound impacts on the Watershed's water resources, recreation and ecology.

The natural resource values of the Woodbury and Moodna Creeks are central to our Council's goals and were formally recognized in the 2009 Moodna Creek Watershed Conservation and Management Plan (Plan).<sup>1</sup> Such values for the Woodbury Creek include being an important trout fishery and spawning area, while the Moodna Creek was recognized as a Priority Aquatic System in Orange County's Open Space Plan (2004) and includes a tidal area near the Creek's confluence with the Hudson River that was designated as "Irreplaceable" by the NY State Department of State's Coastal Zone Management Program. Both streams are important for recreation and are widely used for fishing, canoeing, and kayaking.

As documented within the Plan, many streams within the Moodna Creek Watershed also suffer from degraded water quality. We are concerned that stream water quality could worsen if stream flows were reduced through the export of water from the Watershed. In particular, the impact of point sources, such as SPDES discharges, on stream water quality would be enhanced under decreased stream flow conditions.

To summarize, we are concerned that the Village's proposed project has the potential to reduce stream flows and groundwater availability in the Moodna Creek Watershed. Such a reduction in flow could negatively impact recreational activities such as fishing and paddling, could degrade significant ecological resources such as habitats found at the tidal area of the lower Moodna Creek and trout fisheries, and could decrease the yield from nearby wells. These impacts have not yet been adequately addressed through the SEQR process.

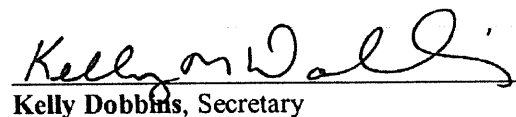
We hope that your Department will require additional analysis regarding the impact of the proposed water withdrawal and resulting interbasin transfer on the Moodna Creek Watershed before rendering a decision on this important matter.

Sincerely,

 <sup>(KD)</sup>

Neal Halloran, Chair

Town of Goshen Code Enforcement Officer: 294-6430 ext. 227 or NHalloran@townofGoshen.org



Kelly Dobbins, Secretary

Project Manager, OCWA: 615-3847 or kdobbins@orangecountygov.com

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<sup>1</sup> The Memorandum of Agreement that created the Council in October 2010 can be found on the website listed above in the letterhead, while the Plan and other relevant documents can be found on the webpage <http://waterauthority.orangecountygov.com/moodna.html>