

To: Tim Miller Associates
10 North Street
Cold Spring, NY 10516

From: Geoff Welch
The Ramapo River Committee
15 Liberty Rock Road
Sloatsburg, New York 10974

Date: June 22, 2015

Re: Public Comments on the Kiryas Joel Annexation Draft
Environmental Impact Statement

The Ramapo River Committee requests the following issues be addresses in a Supplemental Environmental Impact Study:

Kiryas Joel is located in the Northern Headwaters of the Ramapo River Watershed. The Watershed is also the designated area of the Federal Ramapo River Sole Source Aquifer listed in 1992.

“...the U.S. Environmental Protection Agency has determined that the Ramapo River Basin Aquifer Systems within the Ramapo River Basin satisfy all determination criteria as a Sole Source Aquifer pursuant to section 1424(e) of the Safe Drinking Water Act. Satisfying the designation criteria resulted in the following findings: The Ramapo River Basin Aquifer Systems are the sole source of drinking water for the Aquifer Service Area; there are no viable alternative drinking water sources of sufficient supply; and if contamination were to occur, it would pose a significant hazard to the public health...”

www.epa.gov/region02/water/aquifer/ramapo/fr_rampo.htm

Since undeveloped forested lands offer the highest level of surface and ground water quality and protection, we request that the supplemental DEIS address environmental impacts from the expected urban level of development in the proposed Kiryas Joel annexation areas, particularly in the onsite streamflow source areas, of the Ramapo River designated Sole Source Aquifer.

Please address downstream environmental impacts on surface and ground water and on the public water supply areas and the Ramapo River aquatic ecosystem in New York and New Jersey.

Special Consideration in the Supplemental DEIS should be given to potential negative impacts from non-point source pollution and point source point source pollution on the aquatic ecosystem and the recreation uses in the several mile segment of the Ramapo River in Harriman State Park downstream in Orange County and the New York State Recreational Ramapo River Corridor in Rockland County.

If Kiryas Joel Annexation was to occur what zoning exists to protect riparian buffers, wetlands, vernal ponds?

How would Kiryas Joel's watershed protection zoning compare with that in the New York City upstate watershed lands? How would Kiryas Joel's watershed protection zoning compare with that in the State of New Jersey's Highlands Preservation Zone?

Please address these other concerns in the Supplemental DEIS:

- The expansive commercial development, with large parking lots and heavy traffic, build in the Ramapo River Sole Source Aquifer in Orange County is already a concern for water quality. Losing more natural areas for urban development in Kiryas Joel will further impact water quality.
- Wastewater discharges upstream of the UWNY Ramapo Valley well field and Suffern well field are presently about 8 mgd. Wastewater discharges will increase with new development such as Kiryas Joel and Tuxedo Farms in Tuxedo. River flow at the Ramapo Valley Public Water Supply Well Field during drought is about 8 mgd. USGS studies show that most of the well fields' supply comes from the river during drought. Most of the well fields' supply is thus wastewater during drought. This is a concern for public health.
- Kiryas Joel Poultry Meat Processing Plant and the Kiryas Joel Meat Market Corporation severely violated the Clean Water Act

as cited by the EPA. How can we expect environment enforcement with Kiryas Joel Annexation of more land?

- “From at least 2008 until May 1, 2011, as dischargers of stormwater associated with industrial activity, Defendants failed to apply for an individual permit or to seek coverage under a stormwater general permit, as required by law.
- At various times from at least 2008 until May 1, 2011, Defendants took inadequate steps to prevent stormwater associated with their industrial activities from discharging into storm drains and storm sewers that ultimately discharged into waters of the United States.
-
- At various times between January 2008 and April 2011, Defendants discharged wastewater containing excess concentrations of pollutants into the sewage plant at levels that caused violations of the plant’s permit.”

Thank you for your consideration of these environmental concerns.

A new map of the Ramapo River Watershed is included below:

Ramapo River Watershed

