

Rockland Coalition for Sustainable Water

www.sustainablerockland.org · RocklandWater@gmail.com

845-429-2020

Hon. Harriet Cornell, Chair
Rockland County Legislature
11 New Hempstead Road
New City, NY 10956

February 28, 2011

Subject: Rockland County Comprehensive Plan
Re: Planned vote by full legislature on March 1

Dear Legislator Cornell & Rockland Legislators,

We understand that the Rockland County Legislature is preparing to vote this Tuesday, March 1, on the final draft Rockland County Comprehensive Plan. The Rockland Coalition for Sustainable Water, which includes most of the environmental groups in this county, working together with major regional and national groups, calls on the Legislature to postpone its vote in order to reconsider two particularly critical environmental issues – water and open space.

While we recognize the improvements made to the plan, the current final draft fails to address one of the most critical issues facing this Rockland County – the need for a sustainable and comprehensive water management plan. Secondly, this document would, for the first time, place a higher priority on devoting open space to recreational and, even, to transportation uses rather than for protection of our environment and natural resources. Doing so will open up remaining natural areas, previously protected as open space, for environmentally destructive uses.

If the Legislature chooses to approve the current draft plan, we ask that you first pass a resolution to complete a comprehensive and sustainable water management plan by the end of November. We also ask the Legislature to revise the plan to unambiguously eliminate the threat to open space.

This document fails to provide a plan for water policy, one of the most critical issues facing the county. It is clear that this is not an oversight, but rather a carefully considered decision to defer difficult choices. This plan is missing a fundamental piece of the groundwork for planning, since land use policy should be based on water resources and not the other way around.

A plan requires commitment to a clear direction. An effective plan includes clear goals, and a road map to reach those goals: measurable objectives, and a schedule for their implementation. Instead, we see a determination throughout to keep this plan 'neutral', to avoid choices on water policy by listing all possible options without determining direction. We recognize that the Plan has come far from the first draft. Nonetheless, this document defers the planning process to United Water, with the implicit assumption that the desalination plant will be built, in the absence of adequate public policy.

The failure to include a water policy in the Comprehensive Plan is a lost opportunity at a critical time. Instead of shaping policy which could help Rockland residents avoid the costs of desalination, as well as the related environmental impacts, this plan sets us up to wait for completion of United Water's planned desalination process.

We call for a comprehensive, sustainable water management plan in this plan, which will include:

- Critical analysis of demand vs. need. We need a reevaluation of the assumption that all of the demand for water, including summer lawn watering and water-wasteful practices must be supplied in full, without any measures to restrain demand.
- A comprehensive water conservation and efficiency policy
- Close review of wastewater reuse measures, including redirection of wastewater discharged into the Hudson River, as discussed in the U.S. Geological Services (U.S.G.S.) Study commissioned by the county
- Rainwater harvesting and grey water reuse
- Green infrastructure to enhance recharge of aquifers
- Active measures to protect water quality of groundwater and surface water supply.
- Smart growth development policies to protect natural hydrology.
- Protection of water sources, watersheds, watercourses and their riparian surroundings.
- Active preservation of Rockland County's suburban forests.
- Recognition of the limits of reasonably available, environmentally sustainable water resources that can support new development.
- Vigorous county leadership, with a taskforce on water that will include municipalities, given that land use policies and building codes have a profound effect on water supply and quality

This plan should be based on:

- full information from the U.S.G.S. Study called for by the County and just completed at a cost of \$1.5 million after five years of work
- the results of a NY State Department of Environmental Conservation audit of releases from Lake DeForest, as recently requested by the county legislature
- a cost-benefit analysis of alternative approaches to Rockland's water needs.

A second crucial issue in this Comprehensive Plan is that it reverses the long established and well respected value of protecting passive open space and habitat before recreational use. The Plan proposes that the County acquire parkland along streams to establish trails connected to roadways. This trail-to-road network, which will be used by bicycles and ATVs, would fragment critical habitat. While outdoor recreation and alternative transportation such as biking should be encouraged, it must be done in a way that minimizes impact on other open space values such as habitat protection, biodiversity, and aquifer recharge. We see this as a water issue, given the connection between the health of our streams, the health of the Hudson River, and the quality of our water supply. We ask you to reaffirm in this plan the hierarchy of open space values long established for the county and to rethink the proposed network of trails along stream corridors.

During the course of this last eighteen months, the County Comprehensive Plan process has been a catalyst for new thinking about the issues facing the county. County staff, elected officials, state professionals, but also an impressive number of Rockland citizens, have come forward to grapple with the problems facing the county and to collectively think through solutions. Then, in the last few weeks, the U.S.G.S. five year Rockland County Groundwater Study was completed, giving us all much more of the key data needed to formulate policy. The water policy issues we are deliberating here in this county have engaged professional environmentalists all up and down the Hudson Valley.

We have a limited period of time to shape a sustainable water policy before the future of our water resources is decided for us irreversibly. But we are much more ready now as a County than we were eighteen months ago to work on a sustainable water plan. We urge you not to let this critical time pass. We call on the Legislature to defer the vote on March 1 in order to include a water policy in the Comprehensive Plan or to pass a resolution, committing the County to complete a sustainable, comprehensive water plan by next November.

The following members and organizations of the Rockland Water Coalition have endorsed this letter.

Sincerely,

Citizen's Campaign for the Environment

Dorice Arden Madronero

Food & Water Watch

Preserve Ramapo

Riverkeeper, Inc.

Rockland RAFT - Rockland Residents Against Flooding Tomorrow

Rockland Sierra Club

Shirley Lasker, Clarkstown Councilwoman

SPACE - Stony Point Action Committee for the Environment

Sparkill Watershed Alliance

Strawtown Studio

Torne Valley Preservation Association

West Branch Conservation Association

cc: Rockland County Legislators, via e-mail