Croton Watershed Clean Water Coalition

CWCWC

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OUR WATER OUR FUTURE

KENT MANOR HARMS THE CROTON WATERSHED

The latest effort at developing the Kent Manor project is 273 condominium units on 113 acres with its own independent water supply system and sewage management system. As of March 13, 2007, the freshwater wetland permit from NYS DEC has not been issued as the DSEIS application has been deemed incomplete for three reasons:

1. Wetland mitigation
2. Water supply issues with wells
3. SPDES of 70,000 gpd from the wastewater treatment plant

All require additional information.

NYCDEP is acting as lead agency and had a public hearing February 6 in Carmel during which testimony unanimously opposed this development. The most serious problem appears to be the sewage effluent going to Palmer Lake although many expressed concern with the impact of this development on traffic and individual water wells.

Our gratitude to George Rowe, Jr., President of the Ambrose Monell Foundation in NYC for an unrestricted grant of $15,000 received in December, 2006. This allows us to do important work in furthering our mission.

This newsletter is devoted primarily to describing testimony presented by many of the CWCWC board members and consultants:

Ivanka Beck Roberts Testimony

Traffic increase from new residents in 273 proposed townhouses on Rte 52: Fair Street and Gleneida Avenue - are already now categorized as “E” roads - the second-to-worst as far as traffic congestion is concerned. State DOT must review Kent Manor today - it cannot look at the project in isolation. The cumulative

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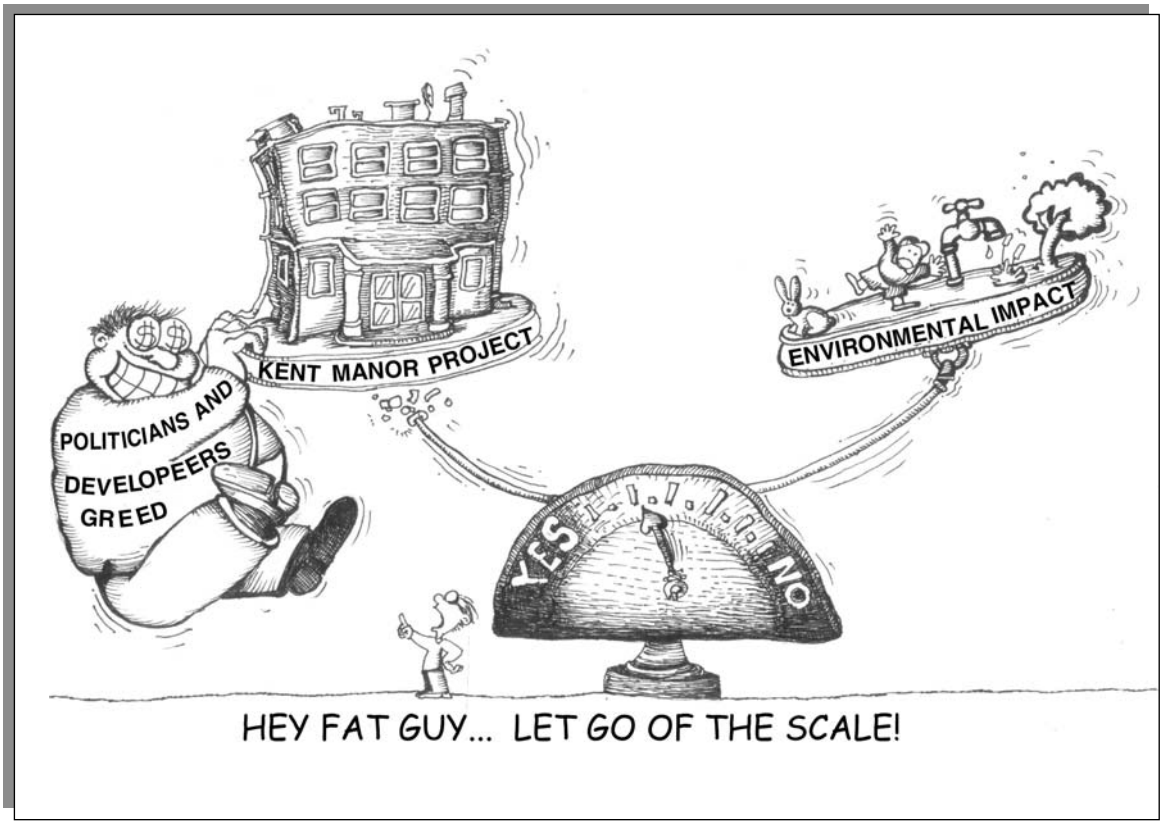

Illustration by Enrique Dura

Kent Manor, *(cont'd from page 1)*

impact of all the developments proposed will create problems. In addition, Kent-Carmel border is not the end of Rte 52 – this will impact both directions from Carmel. Increased heavy traffic congestion on that road puts the health and lives of the residents in Kent and Carmel at risk.

Fire stations will be impacted by this: Kent, Lake Carmel and Carmel, the latter two located directly on Rte 52. With the increase of traffic from Kent Manor - and the cumulative impact with the other proposed developments - there will be gridlock. Fire engines will not be able to get to fires and accidents, the police will not be able to move along it. The emergency medical helipad is located behind the Carmel Fire Station - and will be inaccessible. And ambulances trying to get to the hospital will not be able to get through. Permitting this size of development in this location poses a major danger for all residents and those passing through.

... [The] DEP's responsibility is to protect the drinking waters for over 9 million people...

Carmel schools are full already. The SEIS indicates that only 39 children are expected to live in 273 condos. Kings Grant condo complex in Carmel is much smaller - and yet at one time 120 children from it attended our schools. This development will require new buildings and classrooms, which will require increased school taxes. This affects everyone who pays for the Carmel schools, not just the residents of Kent, and is particularly costly for seniors.

Results of the hydrogeologic surveys showed that surrounding wells were impacted during testing the wells on the Kent Manor Property. Draw-down would exceed recharge during dry periods and drought periods will be compounded by the fact that the water is drawn from fractures in rock - it is not a homogenous aquifer. Yet a healthy groundwater supply is mandatory for the health of the environment and of the drinking water.

The DSEIS uses the formula for phosphorus export coefficients based on a study done in the Pacific Northwest. The forestation and soils there are very different than in this area - and its use in this case is obsolete. The determination of phosphorus export coefficients should be site-specific. The Pacific Northwest formula for pre-development is almost twice as high as in this area. It would become apparent that "post-development phosphorus coefficient will be the same or less than pre-development" is erroneous. It will, in fact, be twice as high if the correct formula were used. In regard to nitrogen, Palmer Lake was already considered to be nitrogen limited in 1987. Yet the nitrogen levels of the proposed development are several times higher post-development than pre-development.

Additional non-point runoff from paved surfaces and storm water to the detention basins will require provisions to limit phosphorus runoff to our reservoirs. Additional flows from the STP are potentially negatively affecting the wetlands. If the ponds are to be used as storm drainage control structures, then the release from them should be determined and controlled as well. The access road from the development to Route 52 will cause additional filling of the wetland. Damaged wetlands and wetland buffers will occur. Turbid storm flows traverse basins and are discharged into streams and ponds where they have potentially severe negative effects. Dissolved nutrients during heavy storm events do not settle out. Detention basins located within the wetland and/or wetland buffers should not be permitted.

Wetlands and water bodies along or in close proximity to these roads will endure increased contaminants - oils, gasoline, sand, salt - are deposited on the road and run off into those wetlands and water bodies. Small wetlands are more sensitive to insults - our wetlands cannot afford to be further degraded! Even minimal injury to them can have a potentially major negative impact as the outflow from these wetlands goes straight to Palmer Lake, to Michael Brook, and on to the Croton reservoir.

The DEP should not reverse its position now: its responsibility is to protect the drinking waters for over 9 million people in the City, Westchester County and Putnam County. DEP has the responsibility to protect public health - its authority to do so derive from Section 1100 of the

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Kent Manor, *(cont'd from page 2)*

New York State Public Health Law, which gives ultimate jurisdiction to DEP within its watersheds. This project should never be approved.

David Clouser, PE and licensed surveyor reported:

Our task was to go through the SEIS and try to determine the validity of data. Initially, the information was insufficient at the Public Hearing February 4th. I received the full documentation (DSEIS and Engineering Drawings) the next day to do our review. In summary, the report stated:

•"The project's stormwater design is severely flawed, showing a complete misrepresentation of the potential flooding impacts and very substantial pollutant impacts associated with the proposed development."

•"The project as presented, also does not meet the requirements set forth in the 'Pilot Process Offset Program,' due to the obvious miscalculation of stormwater pollution loading values and the nonconformance with the basic requirements of the DEP/EPA Program that is meant to safeguard the New York City water Supply."

•"With regard to wetlands, the proposed negative impacts to the wetlands and their buffers are substantial and warrant further reconsideration of the project's design."

•"Substantial modifications must be made to the project's design to create a stormwater management design that is accurate and meets current regulations. The current design utilizes incorrect parameters that skew the design towards smaller detention ponds and giving a false determination that the project will have no adverse impacts related to stormwater. The stormwater management system as designed cannot handle the quantity of flow that will be generated by the development, nor can the system remove the pollutants that are required by the NYCDEP/NYSDEC."

The study further outlined detail problems on

- using insufficient Stormwater Quantity,
- major damage from Stormwater Quality,
- using another Phosphorus Offset Pilot Program (POPP), and
- Substantial damage to Wetlands.

The quality issue specifically was with the drainage basin as a "Phosphorus Restricted Area" as identified in the Total Maximum Daily Load (TMDL) requirement per federal US EPA program conditions as administered by the NYSDEC. Using site specific phosphorus export coefficients for forests removed would require substantially more treatment to remove the pollutant generated by this proposed project.

Clouser's report concluded that substantial changes to the project design was necessary to bring the project in compliance with current stormwater regulations and commonly accepted engineering standards. Issues such as inaccurate stormwater parameters and revised pollutant loading rates would necessarily substantially change the layout, scope, scale and direction of the project. Conformance with DEP's POPP program directly affects the feasibility of the project, and wetlands impacts are substantial. It is questionable whether the site can handle such a high density development while following current regulations, using proper and acceptable engineering practices and avoiding significant adverse environmental impacts.

Jim Bacon, Esq., CWCWC's environmental attorney, who recently won a major victory stopping the Meadows at Deans Corners, gave the following remarks about Kent Manor:

REPORT CARD ON DEP and DEC EFFORTS TO REDUCE PHOSPHORUS IN THE CROTON: GRADE "F"

Why has DEP failed to achieve State Water Quality Standards for the use-impaired Croton reservoirs?

These comments review the role phosphorus plays in polluting the reservoirs and describes how DEP (and DEC) continue to violate the public trust by allowing the reservoirs' water quality to continue to degrade threatening the health and safety of 8 million New York City residents and 1 million residents of Westchester who drink Croton water.

Why is phosphorus a problem in drinking water reservoirs?

As explained by the NYS Attorney General's office:

"…water quality problems at the New Croton have

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Kent Manor *(cont'd from page 3)*

created an "operational nightmare" for DEP. As water quality degrades each summer (with a corresponding increase in customer complaints), DEP has to shut down the flow from the New Croton or blend New Croton waters with higher quality waters from the Catskills to dilute the pollutants. These reservoir shut-downs often occur for months at a time. Such actions by DEP support a finding that the New Croton water quality often does not meet its New York State classification and best use as a source of drinking water. This problem, if unaddressed, could significantly worsen under drought conditions, flooding scenarios, operational failures in other portions of the water supply system, or increased demand for water in the New York metropolitan area over time."

The New York State Department of Environmental Conservation (DEC) and New York City Department of Environmental Protection (DEP) along with the U.S. Environmental Protection Agency (EPA), have implemented a Total Maximum Daily Load (TMDL) program to reverse declining water quality in the Croton reservoirs. However, DEP's last "Watershed Water Quality Annual Report" indicates the phosphorus concentrations in the Croton Falls and Middle Branch reservoirs continue to significantly exceed State Water Quality Standards (SWQS) and have risen, rather than decreased since 1992.

Why are phosphorus levels rising?

The evidence clearly indicates that one significant factor may well be DEP's and DEC's acceptance of a generic phosphorus loading coefficient of 0.10 lbs/acre/yr. That export coefficient was published by DEC in its "Reducing the Impact of Stormwater Runoff from New Development" (1992). Developers continue to use the wrong factor in calculating predevelopment phosphorus loadings without objection from DEC or DEP, with the exception of the Belleayre project West of Hudson.

Has the Croton been tested to determine predevelopment phosphorus levels?

Since DEP's adoption of 0.0446 in 1996, every subsequent TMDL report on reducing phosphorus in the Croton watershed has relied upon that figure.

DEP has not published its own studies conducted in the Croton, although its "2006 Watershed Protection Program Summary and Assessment" states that "baseline monitoring commenced in May 2005" for a 163 acre site in the Middle Branch basin.

What is DEP's position on which export coefficient should be employed?

DEP's position has been inconsistent, especially in relation to whether the proposed project is within the Catskill watershed rather than the Croton.

In the Croton, DEP continues to grant Stormwater Pollution Prevention Plan (SPPP) permits based upon the 0.10 figure, e.g. Carmel Corporate Centre and has not challenged the use of that figure in other significant projects in the Croton undergoing or having completed the SEQRA process including Hillcrest Commons, Gateway/Fairways, Patterson Crossing or Kent Manor.

By contrast, West-of-Hudson, in DEP's comments on the Crossroads Ventures Belleayre ski resort/hotel project, DEP advised the applicant that reliance upon site-specific data was far superior than any other method of calculating the project's phosphorus impacts. DEP referred to 3 years of testing results for phosphorus in the Giggle forest near the project site, citing that as a better example of which export coefficient the developer should use in its SPPP.

Interestingly, the Giggle forest three year average between 2001-2003 was 0.046 lbs/acre/yr. DEP also cited studies by Shuyler and Hart determining forested export coefficients of 0.033 and 0.048, respectively. (Converting the figures from kilograms per hectare to lbs. per acre).

What phosphorus coefficient should be used in the Croton?

In the absence of site-specific data, DEP, DEC and lead agencies conducting SEQRA reviews should use 0.0446 lbs/acre/yr - the phosphorus export coefficient utilized by EPA, DEP and DEC in the investigation and establishment of the TMDLs.

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Are there projects where CWCWC and Putnam County Coalition to Preserve Open Space (PCCPOS) have raised this issue?
Yes. CWCWC/PCCPOS currently have two Article 78 Proceedings pending against the Town Planning Board of Carmel, each which involve this precise issue.

CWCWC/PCCPOS have also raised this issue in its SEQRA comments on many watershed projects including, Eagle River, Gateway/Fairways, Hillcrest Commons, Patterson Crossing and Kent Manor.

In Kent Manor the issue is particularly relevant since DEP is the lead agency.

We also challenged DEP's faulty wetlands review, endangered species review and inadequate examination of alternatives. We also challenged the project's acceptance into the Phosphorus Offset Pilot Program (POPP).

We also argued that NYC's Watershed Rules & Regulations would specifically prohibit this project from being considered as part of the POPP because the County and Town had not agreed to have the project participate in the POPP, no Croton Plan had been adopted by Kent, questioned DEP's unilateral extension of the POPP 5-year time frame and argued that the project did not show a 3:1 reduction ratio for the amount of new phosphorus the project would discharge.

We also argued that:
… the DSEIS does not demonstrate that the pilot program has been effective for the Brewster Highlands project. Indeed, records with DEC and DEP's own "2006 Watershed Protection Program Summary and Assessment" indicates Brewster Highlands has not complied with the POPP offset requirements. DEP should discuss why this was the case and why Kent Manor might succeed in the face of prior failure, i.e. "phosphorus load calculations from 2002 through 2005 will be recalculated using a consistent, DEP-approved method" citing two "compliance conferences" with Highlands in 2005.

Our comments concluded that:
"…the SDEIS is deficient and must be supplemented by an accurate and complete EIS."

One final note, CWCWC has learned that DEP has recently issued a report stating that it will not be extending the POPP to any other projects. We expect to report on this issue further upon receipt of that report.

Ann Fanizzi

I chair the Putnam County Coalition to Preserve Open Space and I am Secretary to the Croton Watershed Clean Water Coalition.

I want to reiterate that I demand that the DEP initiate a mandated assessment of the current Phosphorus Offset Pilot Program that you have in Brewster Highlands. This STP was installed seven years ago. We need to know if it is working to reduce phosphorus runoff. Why are you putting in another new POPP when you don't even know the efficacy of what is already installed for the same purpose? You have the opportunity to do it, and the responsibility to do it now. Get it assessed and report that it works before approving another one.

Secondly, I want to know who owns the property that is discussed as Kent Manor. I want to know who we are talking to. Have they been in bankruptcy? Are they in jail?

Finally, it seems inconceivable that we should be having this meeting when this property's future is still in the appellate courts. We have not heard a decision on this Kent Manor matter. Why are we doing all this work and even discussing the proposal when it may be stopped anyway? DEP should wait for that decision before any further action is taken.

Excerpted from Bill Wegner's comments of Riverkeeper:

We also share concerns of Ivanka and Jim Bacon of CWCWC about the phosphorous loading calculations. And we would like to see the applicant be required to recognize and employ DEP's Croton Falls basins specific predevelopment loading figure, and then design stormwater management practices that will avoid doubling the predevelopment phosphorous export to receiving waters, which, in this case, includes phosphorous-impaired Croton Falls Reservoir.

CWCWC and NYC Friends of Clearwater will share a table in Grand Central Station's Vanderbilt Hall on Saturday and Sunday, April 14 and 15 for Earth Day, 2007. Come visit us!

The general membership meeting of CWCWC - Thursday night, March 15th

Purchase Friends Meeting House was packed with a powerpoint presentation on the Croton Watershed, a visit by Assemblyman George Latimer with his remarks and an address by Paul Feiner, Supervisor of Greenburgh, discussing regional planning. The powerpoint presentation, very well received by the audience, describes our mission, member groups and displays many activities conducted by the Coalition. Although the Croton Watershed covers both Westchester and Putnam Counties, the majority of problems incurred by irresponsible development are occurring in Putnam County. The recent legal victory by our attorney Jim Bacon over the development Brewster Meadows at Deans Corners was emphasized in which lead agencies must require accurate and detailed information in reviewing a project's environmental impacts during the State Environmental Quality Review Act (SEQRA) process. Another highlight was using appropriate Phosphorus Export Coefficients for pre-development forested areas versus the inappropriate present use of northwest National Urban Runoff Program (NURP) criteria at more than twice the appropriate amount for the Croton. This exacerbates the phosphorus problem in our reservoirs.

Fay Muir, president, and David Ferguson, vice president, fielded a number of questions from the audience particularly about what citizens can do to assist CWCWC.

George Latimer spoke about the NYS budget negotiations in progress and the complication of the Albany body politic. He also offered counsel to CWCWC with other Westchester Assembly members Paulin, Galef, Bradley, particularly in identifying and acquiring sensitive open space in the Croton Watershed. Assemblyman Latimer described the importance of the bigger bottle bill. If it passes the legislature, it provides the funding to increase NYS Environmental Protection Fund from $250 million a year to $350 million a year.

The highlight of the evening was a presentation by Greenburgh Supervisor Paul Feiner on the secondary impacts of large-scale development in neighboring communities. Although serious topics, he displayed creative leadership in his ideas and enlivened the audience with adroit humor throughout. He cited litigation between Greenburgh and Yonkers which was settled by implementing various traffic control techniques on Austin and Jackson Avenues. A similar set of problems will occur with the 3 million square foot Ridge Hill development. Supervisor Feiner explained his offer to neighboring village or town council members to cooperate with Greenburgh council such as establishing Inter Municipal Agreements. He described deputizing specific activists as assistant supervisors on planning boards in order to provide citizen input and direction on council matters regarding new developments. Greenburgh was the first town in Westchester to pass an open space referendum with 65% approval and is also a member of Greenway Community. He concluded with mobilizing citizens effectively by letters to the editor every week, distributing flyers in front of supermarkets, emphasizing diminishment of quality of life issues, recruiting Not In My BackYard (NIMBY) residents who fight the hardest. In spite of a wintry mix falling outside, people stayed to the end enjoying a dynamic exchange of ideas.

Joe Montuori and a group of residents at Kirk Lake in Mahopac have started organizing the lake community with a new Kirk Lake Watershed Network at http://kirklake.blogspot.com/. Welcome and good luck!

Our Water Supply: The Next 170 Years

Elizabeth Royte's "On the Water Front" (New York Times Feb. 18), wrote about the perils facing New York City's drinking water and water supply system but leaves two important factors out of the equation.

First, the Bloomberg administration has demonstrated that it is less interested in protecting the water at its source than it is in appeasing the construction unions clamoring for jobs on an unnecessary chemical filtration plant in the Bronx — one that employs antiquated dissolved air floatation technology, with costs far higher than that of a comparable membrane filtration plant in San Diego County, and deprives an underserved area of its parkland.

Second, if New York City is serious about protecting the high quality of its precious drinking water, it will need to strongly challenge upstate real estate and development interests in the regulatory process to protect our water at its source.

Donald C. Pachner
Bedford, N.Y.

The writer is treasurer, Croton Watershed Clean Water Coalition.

Action Alert!

CWCWC discovered that lead agencies and regulators are using inappropriate calculations of predevelopment phosphorus runoff that allow more than twice the amount of phosphorus runoff to enter the reservoirs. This is a serious issue as most of the Croton reservoirs are already impaired by excess phosphorus. It is imperative that all CWCWC member groups sign on to our letter to all Croton regulator and lead agencies to use the appropriate calculations. Call (914) 234-6470 for more help or explanation.

NEW:
Donald C. Pachner
Treasurer
CWCWC
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Bedford, N.Y 10506-0484

Our next newsletter will discuss impacts and secondary economic additions from unsustainable development. Who is impacted and who pays?

March 27, 2007

Ms. Angela Licata, Assistant Commissioner
Department of Environmental Protection
59-17 Junction Boulevard
Flushing, NY 11373

Dear Ms. Licata:

Comments on Kent Manor Draft Supplemental
Environmental Impact Statement (DSEIS)

The Croton Watershed Clean Water Coalition is dedicated to preserve and protect the waters of the Croton as well as the lakes, streams, rivers, wetlands and forests which are an integral part of the watershed.

The Kent Manor DSEIS estimates for the Nichols Street area, 70,000 gallons per day of sewage treated effluent will enter the wetlands and then into Palmer Lake. Also, they will have to deal with the expected accompanying stormwater runoff from the project. Phosphorous loading will increase by a factor of 11, suspended solids by a factor of 10, nitrogen by a factor of 16 and biochemical oxygen demand by a factor of 3. This will undoubtedly have a devastating effect on Palmer Lake and the local groundwater supply. Phosphorous offset measures should first and foremost serve those most affected by this project. The phosphorus loading should be carefully measured and be site specific in order to ensure post-development estimates are adequate and accurately fulfill regulatory requirements.

Stormwater management systems should use the proper pre-development values in the project design and approval process. Using the proper design basis needed to lower phosphorus to the correct levels ought to be mandated. ***DEP data show that phosphorus levels in eight out of ten Croton reservoirs have been increasing***. At least, 85% of phosphorus entering the reservoirs originates from non-point sources. These non-point sources are storm water runoff from roads, parking lots, lawns and real estate development. Reservoirs are already phosphorus impaired.

In this case, the Kent Manor phosphorus data from the pre-developed land being used to evaluate the post-development phosphorus export is double the correct coefficient. The data used by DEC and DEP in determining the Total Maximum Daily Loads for phosphorus in the West-of-Hudson Watershed developments are site-specific. For the Croton reservoirs, East of the Hudson, the measure used is taken from the National Urban Runoff Program (NURP) standard which comes from the North-West data. The North-West has different weather conditions, soils and rock formations. Site-specific data in the Croton is not used probably because of the decision to chemically treat and filter this watershed. The watershed protection measures for Croton have been substandard ever since this decision was made. This end-of-the-line minimum protection does nothing to prevent groundwater pollution in the local lakes, streams and rivers. The East-of-the Hudson Croton Watershed deserves equal protection as the West-of-Hudson receives to ensure the viability of water supplies for drinking, household use, recreational use as well as wildlife and scenic habitat.

An excess of non-point stormwater runoff caused by overdevelopment and imperviousness can overwhelm septic systems, even if they are well maintained. The effluent from septics mixes with groundwater and can be a health risk. During rain and storm events, excessive infiltration into the pipes leading to a wastewater treatment plant can overwhelm the capacity of the plant resulting in untreated sewage accessing lakes, streams and reservoirs. A proposed development's stormwater plan that will decrease the phosphorus load to the Croton reservoirs is critical.

New lawns and landscaping use fertilizer, pesticides, fungicides, herbicides and insecticides. Pesticides and fertilizers contain chemicals which are endocrine disrupters. The endocrine system regulates hormones that govern reproduction and embryo development, growth and maturation. In addition, the stormwater runoff contains an extremely toxic mix called PAHs (polycyclic aromatic hydrocarbons) from asphalt, motor oil, tires, as well as fertilizers, etc. along with roadside debris.

This proposed development adds 273 housing units with their lawns, landscaping, parking, driveways and removes the forested areas that infiltrate stormwater. The stormwater controls plan should be carefully examined and the proper phosphorus measures instituted so that the proposed development's phosphorus offset program is adequate. The regulations call for a three to one phosphorus reduction; that is, for every one kilogram of phosphorus added by the new wastewater treatment plant and the accompanying non-point source runoff, there will be an offset that achieves at least three kilograms of reduction in phosphorus in the same drainage basin.

We must examine the records for the phosphorus offset provided to the Brewster Highlands to determine whether their offset program is effective. In addition to examining whether the correct phosphorus export coefficients were implemented, we need to know if the Brewster Highlands development is in compliance with the regulations. The public should be updated as to who is monitoring this program and how successful it has been.

This important information must be determined in order to see whether another offset should be allowed. There should be no further steps forward in the Kent Manor development plans without a definitive report on the success of the phosphorus offset program at Brewster Highlands.

The phosphorus offsets allowed under the 1997 Watershed Memorandum of Agreement (MOA) was slated to expire after five years. If an extension was assigned by DEP and other MOA signatories, the public records need to be updated in this regard. In addition, Kent Manor is a Town site plan with major changes, therefore the town and DEP are permitting agencies under SEQRA. Should DEP have assumed Lead Agency status for this development. The other concern of note is that under the MOA, Sewage Treatment Plants (STP)s can only be brought into the Phosphorus Offset Pilot Program (POPP) after the town has instituted the Croton Plan. The Town of Kent has not been approved by DEP for the Croton Plan and so is ineligible to be awarded a STP offset. Further, for Kent Manor, 70,000 gpd is an unrealistic underestimate which, together with the 12,000 gpd awarded Brewster Highlands and the 68,000 gpd for Campus at Fields Corners, would likely exceed the 150,000 gpd maximum of the MOA for STP effluent.

These points need to be seriously included in your evaluation of the validity of the proposed DSEIS for Kent Manor. Thank you for the opportunity to comment.

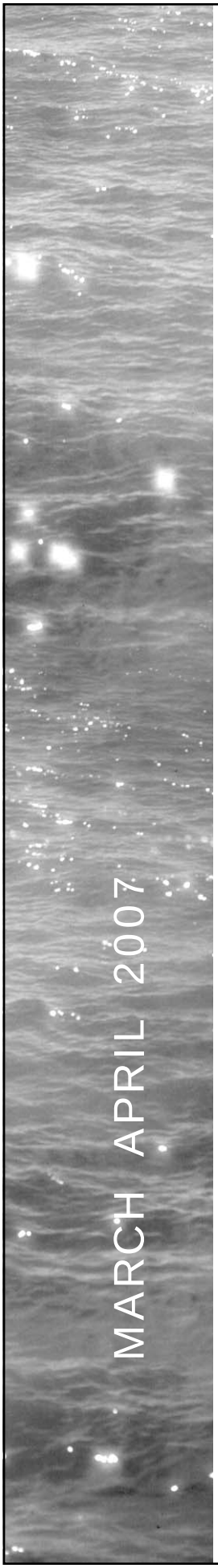
Very truly yours,

Fay C. Muir
President

cc: James Tierney, Watershed Inspector General
David Warne, Deputy Commissioner, NYC DEP, Bureau of Water Supply

Acronyms:

DEC	Department of Environmental Conservation of New York State
DEP	Department of Environmental Protection of New York City
DOT	Department of Transportation of New York State
DSEIS	Draft Supplemental Environmental Impact Statement
EPA	Environmental Protection Agency of US Federal Government
NURP	National Urban Runoff Program
PCCPOS	Putnam County Coalition to Preserve Open Space
POPP	Phosphorus Offset Pilot Program
SEQRA	State Environmental Quality Review Act
STP	Sewer Treatment Plant
TMDL	Total Maximum Daily Load



The Croton Watershed Clean Water Coalition strives to protect and improve the waters of New York City's Croton Watershed, a critical component of the water supply for over half the population of New York State. We are an alliance of individuals and groups who believe that safe, clean and affordable drinking water is a basic human right.

Send in your membership and receive membership mailings and a subscription to CWCWC newsletter "Our Water, Our Future." Most importantly, your membership will help you get involved with the preservation of one of our most precious resources, our water.

Croton Watershed Clean Water Coalition Membership Application

Name:_____

Address:_____

City:_____State:_____Zip:_____

Email:_____

☐ Group/Coalition Membership	$50/year	☐ Students/Seniors	$10/year
☐ Family Membership	$25/year	☐ Other	$_____
☐ Individual Membership	$20/year	☐ Additional Contribution	$_____

Is this a Renewal or a New Membership? (Circle one)

Make checks payable to Croton Watershed Clean Water Coalition, Inc. and mail along with your membership form to:

Don Pachner, Treasurer, CWCWC, INC., PO Box 484, Bedford NY 10506

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CWCWC member groups!
Don't forget to sign onto the phosphorus reduction program! This issue could radically improve the protection of the Croton Watershed!
See inside.