



Via email

Honorable Cynthia Curtis
Chairman
Town of North Salem Planning Board
270 Titicus Road
North Salem, NY 10560

April 4, 2012

Re: Environmental Assessment of Proposed Bridleside Subdivision

Dear Ms. Curtis:

Riverkeeper is a non-profit environmental organization dedicated to protecting the Hudson River, its tributaries and the New York City Drinking Water Supply Watershed. We previously submitted comments on the proposed Salem Hunt subdivision in July, 2008. We have now reviewed the EAF for the revised project, referred to as Bridleside, and have concluded that it will mitigate various environmental impacts associated with the earlier design of Salem Hunt. This is especially important as it relates to the reduction of phosphorus loading to the water quality-limited Muscoot Reservoir Basin, which will be achieved by the addition of an on-site, subsurface-discharging wastewater treatment plant (WWTP) incorporated in the re-designed project.

It should be noted, however, that all subsurface sewage treatment systems have a finite capacity over time to process and adsorb phosphorus from discharged effluent. Even WWTP-treated effluent containing a measurable concentration of phosphorus will eventually saturate the soil structure and cause a subsurface treatment system to fail. When drafting SPDES permits that will regulate subsurface discharges of wastewater effluent from this project, the involved regulatory agencies should consider requiring monitoring of phosphorus concentrations in the wetland that is sited downgrade from the proposed leach field. This subsurface treatment system may perform adequately for decades, but monitoring would alert the operator of increases in phosphorus transport and assist in averting future contamination of surface water resources in the New York City Watershed.

Thank you for the opportunity to comment on this issue.

Sincerely,

William Wegner
Cc: Involved agencies