



December 2, 2021

Re: Comprehensive Plan Update 2022 - Comments from the Sparkill Creek Watershed Alliance

Dear Supervisor Kenny and Comprehensive Plan Committee,

The Sparkill Creek Watershed Alliance is a community action group committed to promoting environmental awareness, through partnerships and practices that restore and preserve the health of the Sparkill Creek.

The Sparkill Creek begins and ends in the town in Orangetown. Starting at the top of Clausland Mountain, it has an eight mile journey through Orangetown's parks, commercial districts, and the yards of residents of Orangetown's villages and hamlets.

The rigorous and on-going study of this watershed by our members has given the Sparkill Creek Watershed Alliance a deep familiarity with the physical waterbody and surrounding land use. We have enjoyed a good relationship with the Town over the years and have worked closely with several departments to the benefit of our community. It is with this local understanding and our determination to see the health of our watershed improved through environmentally – focused planning and zoning, that we submit to the Town of Orangetown our recommendations for a new Comprehensive Plan. Though we are most familiar with the Sparkill, many of the comments below apply equally well to all of the watersheds in Orangetown.

The Sparkill Creek Watershed Alliance recommends the following be included in Orangetown's 2022 Comprehensive Plan:

Watershed Planning

Our Watersheds need management – they must not be ignored. Watershed Planning should be a be a priority for the Sparkill. After an initial assessment including accurate mapping, such a Watershed Plan would establish goals for Water Quality, Flood Control, Riparian Protection, Recreation, etc.

Watershed Protection

Water Quality - The Town should prioritize pollution prevention in its watersheds. This includes everything from finding sources of pathogenic bacteria to prevention of siltation. For example, though the Sparkill Creek begins in pristine parkland on Clausland Mountain, after travelling through developed areas it becomes severely degraded. The Sparkill Creek is designated as an "Impaired Waterbody" by NYS DEC. The high levels of Enterococcus bacteria found in the Sparkill indicate an increased risk that pathogenic bacteria from sewage, septic or other sources are present. The creek also suffers from other contaminants including siltation. (<https://www.riverkeeper.org/water-quality/citizen-data/sparkill-creek/> - and - <https://www.dec.ny.gov/chemical/36730.html>)

Stormwater Controls and Runoff Reduction – Flooding continues to be a serious problem. It not only endangers our properties and infrastructure, it also damages the few natural riparian areas on the creek. We need local protection beyond what is in place now. This problem will only get worse - climate changes predict more rainfall in the future.

Local Protection Requirements - Because Orangetown is mostly built-out, many development and re-development projects disturb less than one acre so do not require a Stormwater Pollution Protection Plan thus increasing already severe stormwater problems. At a minimum Orangetown needs local laws to lower the area thresholds and require redevelopment projects to adhere to modern stormwater standards.

Impervious Surface Reduction - provision should be made to reduce creation of new impervious surface and to reduce when possible existing impervious surfaces.

Zero net Runoff - The goal at least in selected areas should be zero net runoff. At a minimum, no increase in velocity or quantity should be permitted.

Mitigation Projects - More projects like the Home for Heroes detention and infiltration basins are needed. The Town should actively pursue this goal in the Sparkill Watershed.

Natural resource protection - Unique natural features such as wetlands and marshes, within the riparian zone provide biodiversity to the watershed and adds to our quality of life. These areas need protection from development, misuse and invasive species.

Appreciation of the Sparkill Creek

Town policy and practice should promote appreciation of the Sparkill Creek as a resource for our community. This is our own watershed beginning and ending within Orangetown. It is an asset to be valued rather than used and treated as a drainage ditch.

Open Space

Open space provides significant benefits to the health of the watershed. The Sparkill Creek lies within one of two open space priority corridors proposed in Orangetown.

Trees

Trees are beneficial from many different environmental and quality of life viewpoints. Specifically, trees within the riparian zone stabilize banks, increase habitat and decrease water temperature and oxygen levels which are key to maintaining the current use status of the creek. We need to live up to our designation as a Tree City by including strong tree protection and tree planting goals into our new plan.


Zoning

Many of the issues related to the Sparkill Watershed can be addressed by updated zoning. Briefly, this may include buffer protection, watershed overlay zones, cluster zoning, better site design, impervious surface codes and stormwater controls.

Notes on Funding the Goals of the Plan

Orangetown cannot accomplish all of the above without outside help. State grants are used in many communities and could fund much of our work. But a successful application for state aid will be disadvantaged without clear future path to these goals that the Comprehensive Plan provides. Because the Sparkill Creek is designated an "Impaired Waterbody" by NYS DEC water quality projects, including wastewater infrastructure projects, that would benefit Sparkill Creek receive priority scoring in state funding applications. This may afford the Town of Orangetown an opportunity to obtain funding. We urge the Town to prioritize grant applications for projects related to any of our recommendations and to emphasize benefits to Sparkill Creek in its grant applications.

Respectfully Submitted,



Jim Elling, Chair

The Sparkill Creek Watershed Alliance

The Sparkill Creek Watershed Alliance is a community action group committed to promoting environmental awareness, partnerships and watershed practices that restore and preserve the health of the Sparkill Creek from its headwaters on Causland Mountain to its confluence with the Hudson River in the Piermont Marsh.

www.sparkillcreek.org