



March  
2010

## Housatonic Valley Association

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Mr. David Wylock  
Co-Chairs, Dover Planning Board  
Dover Town Hall  
126 East Duncan Hill Road  
Dover, NY 12522

and Ms. Valerie LaRobardier

**RE: RASCO MATERIALS SITE PLAN-7061-00-585063 & 7061-00-580190**  
**Applicant: RASCO Materials, Property Owner Howland Lake Partners, LP**  
**Property located at Wingdale Industrial Park, 2241 NYS RT 22, Wingdale**  
**Application for Site Plan on 3.0 acres in *the M district***

Dear Mr. Wylock, Ms. LaRobardier and Planning Board Members:

The Housatonic Valley Association (HVA), founded in 1941 is the oldest non-profit watershed conservation organization in the nation, and is dedicated to preserving and protecting the natural character and environmental health of the Housatonic River and its 1,948 mile watershed, which includes the Swamp and Ten Mile River watersheds in New York. Our work in surface and groundwater protection issues is extensive.

We are most concerned about the proposed cold asphalt operation involving the storage and use of petroleum contaminated soil (PCS) at the Wingdale Industrial Park. The site is close to the Swamp River, a New York designated Critical Environmental Area (CEA) and within the corridor of important lands that HVA and local environmental organizations hope to see conserved in the future. Therefore this project is of primary interest to us.

We are particularly interested in seeing a full environmental review conducted for the project. For example:

1. What specific measures and plans does the applicant have to comply with Section 145-50 of the Dover Town Code? What are the plans for moving the PCS materials onto the site? Will the material be transported loose in open trucks or will it be in containers? Will the material ever be stored out in the open?
2. What specific measures will be taken to ensure that environmental and public safety procedures are in place to minimize risk of contaminants leaching from stored materials?
3. What low impact development techniques are proposed to minimize storm water impacts?
4. The underlying aquifer of the Swamp River may be tapped by the Dover Knolls development to supplement the reservoir and existing and proposed wells in times of drought. The Swamp River is a critically important resource that may need to provide drinking water to many hundreds of people.

There is simply no room for error. What are the potential groundwater contaminants that may be present on-site, and what are the safeguards to prevent potential contamination?

5. What measures will the applicant take to assess, quantify and clean up any contamination which may already be on the site?

6. Although not a Town matter, we believe that the Department of Environmental Conservation (DEC) permit was issued prematurely and that a more thorough review should have been undertaken by the agency to account for any remnant contamination that may be present on the site.

While HVA generally supports the re-use of brownfield site where appropriate cleanup has been successfully completed, it appears that this has not happened at this site. We urge the Planning Board to initiate a comprehensive public review of this project in order to understand the present and future environmental risks. We also request that the Board to extend the public hearing for this application to enable town residents to review and comment on this proposal.

In conclusion, we ask that this application be deferred until the applicant can answer the many questions about the environmental impact of this project and satisfy the Board and Dover residents that there will be no harm to the Swamp River and its environs.

We greatly appreciate the opportunity to comment on this important matter.

Sincerely,

Elaine E. LaBella  
Director of Land Protection

Tonia Shoumatoff  
New York Watershed Manager