



January 10, 2014

Planning Board
Michael Ianniello, Chairman
123 Mamaroneck Ave.
Mamaroneck, NY 10543

Re: Revised Comments on MB&YC Application.

Dear Chairman Ianniello and Members of the Planning Board:

In light of information we learned at the January 8, 2014, public hearing, Save the Sound has amended its previous letter and is submitting this revised version.

We write in strong support of the replacement of the force main and sewage pump station owned by the Mamaroneck Beach and Yacht Club. However, this expression of support should not be read as an endorsement of the full application for club expansion currently before the Planning Board. In fact, our sole purpose in this comment is to ensure a permanent solution to the force main break that plagued Otter Creek and Long Island Sound with raw sewage.

We heard a report on January 8 that the portion of the forced main that received a temporary repair/replacement has been tested and is now operating without leaks to the Otter Creek environment. However, considering the age of the remainder of the unrepaired original force main and the pump station, this portion of unrepaired infrastructure is likely to also be in a degraded condition and could easily leak raw sewage into groundwater and Otter Creek if placed back in use when the club resumes full operations in summer. We therefore ask that the Board and Village require that the Club quickly determine if this unrepaired portion of infrastructure is in fact leaking sewage. If so, we request that the Planning Board and Village explore emergency authorization options to conduct this entire proposed infrastructure replacement before the Club resumes its seasonal operation. We also recognize that because the replacement force main is designed to handle more than 2,500 gallons a day, it is essential that this activity be reviewed and approved by the Westchester County Department of Health.

Working in New York and Connecticut, Save the Sound has a 40-year track record of restoring and protecting the waters and shorelines of the Sound through advocacy, education, and restoration. Long Island Sound is vital to the regional ecosystem and economy. Because a significant portion of the Western Sound's waters are impaired and its shoreline is vulnerable, Save the Sound is focusing substantial resources toward reducing pollution, opening swimming areas, and improving water quality. One clear point has surfaced in our last two years of research: continued and timely progress in upgrading Westchester's sewage plants and sewer infrastructure is essential if the region is to meet its legal obligations to improve the Sound's waters.

It has long been known that sewer pipes, pump stations and other sewer infrastructure throughout lower Westchester are in a seriously degraded condition, riddled by holes and cracks, made non-functional in some places where entire sections have collapsed. This degradation allows raw sewage to escape, polluting ground water and streams that lead to Long Island Sound. The situation is so bad that each time it rains more than a half inch in 24 hours, the Westchester County Department of Health pre-emptively closes 10 beaches, including the beach at Harbor Island Park and five others in Mamaroneck. The result is that Westchester residents have been prevented from swimming at their beaches for more than 100 beach-days in recent summers.

Bacteria entering into our waters through degraded sewer infrastructure poses a significant threat to human health and the environment, and the replacement of the force main and pump station is likely to lead to immediate improvements in Mamaroneck Harbor. However we recognize that Otter Creek is a critical environmental area with significant natural resources, including tidal mud flats; every precaution must be taken during the project's construction to ensure that the work is done carefully, that it is timed to do the least damage to wildlife in the area, and that disturbed areas are restored to their previous condition or improved upon.

Our position that the force main and pump station must be replaced is based on several factors:

- the severity of the leak in the force main that our water quality testing uncovered in August 2013;¹
- the reality that throughout Mamaroneck Village aging, decrepit sewer infrastructure is leaking raw sewage into groundwater and into tributaries of the Sound;
- the probability that the pump station and other sections of the force main are in similarly decrepit condition.

In July and August 2013, Save the Sound conducted a pilot water quality testing program in approximately two dozen locations in Mamaroneck Harbor and on its tributaries. This work was carried out in cooperation with the Village government and a team of volunteers.

¹ <http://greencitiesbluewaters.wordpress.com/2013/09/04/save-the-sounds-water-quality-testing-in-mamaroneck-leads-to-pollution-discoveries-and-solutions/>

Sampling on Otter Creek, we discovered the broken force main and sewage leak. E. coli readings from our sampling were 480,000 and 340,000 CFU/ml, well above the New York State standard of 200. Officials from the Village and from the Beach and Yacht Club moved quickly to carry out a temporary repair. That repair must be made permanent by replacing the entire force main and the pump station.

In the meantime, and considering the severity of the break that occurred under Otter Creek, it is essential that the Planning Board determine definitively if other sections of the existing force main have deteriorated to the point where they are leaking sewage into ground water; and if the existing pump station is allowing stormwater to infiltrate the sanitary sewer system. If those problems are substantiated, the replacement must be expedited to ensure that the new infrastructure is in use when the club reopens for the summer, to prevent additional bacterial pollution.

Replacing the club's force main and pump station is an important first step, but more must be done to eliminate the wider bacterial pollution problem facing the Mamaroneck area. Sewer repairs and replacement are essential in other areas of dilapidated infrastructure within the Village, and indeed throughout the five other municipalities upstream of Mamaroneck. The repairs proposed for the Mamaroneck Beach and Yacht Club's infrastructure are an essential and obvious component of these improvements. For all of these reasons, we strongly support the portions of this application focused on replacing the force main and pump station.

Thank you for the opportunity to comment. Please do not hesitate to contact me (203 787 0646) or Tom Andersen (914 409 6470) with any questions.

Sincerely,



Curt Johnson
Executive Director
Save the Sound

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c.c. Richard Slingerland, Village Manager