David Reagon
CAC Chair Town of Amenia, NY
23 Benson Rd.
Wassaic, NY 12592

August 21, 2014

Dear Town Board Members,

On August 13, 2014 at around 11:30 AM I received a call from Tonia Shoumatoff, the Ten Mile River Watershed Manager for the Housatonic Valley Association, concerning an increase in turbidity in the Amenia/Cascade Brook just downstream from the Silo Ridge project. The area was experiencing a heavy rain shower at the time.

I was concerned about storm runoff, so I went first to where the stream crosses under Lake Amenia Road which is immediately upstream from Silo Ridge. The water in the stream was slightly murky at that moment, but nothing unusual given the amount of rainfall that was still occurring. Figure 1 was taken at that time.

Fig. 1 View of Amenia/Cascade Brook from Lake Amenia road. 11:50 AM, August 13, 2014. Water is slightly turbid.

I then drove to Route 22, parked my car and walked south on the Harlem Valley Rail Trail until I came to the spot where the stream exits the Silo Ridge site and crosses under Route 22. The water in the stream was opaque and brown colored due to its sediment load. Figures 2 and 3 were taken at that time.

Fig. 2 Amenia Brook flowing under culvert by Harlem Valley Rail Trail.

Fig.3 Amenia Brook exiting Silo Ridge and crossing under Rt. 22.

Just north of the entrance to Silo Ridge, a stream of runoff was issuing from two breaks in the runoff containment barriers and pouring into a pond next to the road. Figure 4 illustrates this.

Fig. 4 Water flowing from breaks in containment barriers and into a pond near the Silo Ridge entrance on Rt. 22.

When I got home, I registered my concern with the NYSDEC and I was soon called by Conservation Officer Robert Hoder who said he would visit the site the next day.

Officer Hoder got in touch the next day and reported his findings. First of all, he said that Silo Ridge has a very impressive system for controlling runoff from the golf course construction, one of the best he has ever seen. However, there was a pipe in a retention pond that Silo Ridge workers were aware of but not cognizant of where it discharged. It turned out that the pipe went into a wetland bordering the stream and the wetland had overflowed into the stream, carrying with it a large amount of sediment, which made its way downstream to Wassaic and into Wassaic Creek. Officer Hoder said that Silo Ridge would be correcting the problem and they were not cited for it. The water flowing into the pond was not considered serious since the pond is isolated from the stream. Officer Hoder said to call if there were repeat occurrences.

In spite of Silo Ridge's preparations for stormwater control and in spite of having all required permits and a Stormwater Pollution Prevention Plan (SWPPP) which Officer Hoder had observed and all of which is supposed to be on file in the Town, critical parts of the plan failed and a considerable amount of sediment flowed into the stream. This demonstrates the need for effective, independent monitoring of environmental conditions on site.

Sediment filled runoff can be a damaging pollutant particularly when it flows into a trout stream which is how Amenia Brook is classified by DEC. It has the potential, among others, for smothering bottom dwelling invertebrates that are the basis of the food chain for trout and raising the temperature of the stream. Amenia Brook also passes through at least one area that is a known bog turtle habitat. Any increase in runoff has the potential for causing flooding downstream Wassaic.

At our CAC meeting last night, we discussed this situation including the fact that while this was relatively mild event (About 1.5 inches was recorded at the Carey Institute in Millbrook. Islip, on Long Island received 13 inches of rain from the same storm), the system that Silo Ridge had in place did not fully contain the runoff. We feel that the Town should question whether allowing so much excavation on a steep slope was wise. We also would advise the Town Board to work with Silo Ridge to ensure that the inevitable storms to come will be completely contained. It is everyone's best interest to address this problem now, rather than have to do clean up down the line.

Sincerely,

David Reagon, CAC Chair