



***Water Control Commission
&
Waterfront Advisory Committee***
Stanley H. Kellerhouse Municipal Building
One Van Wyck Street
Croton-on-Hudson, NY 10520-2501

Mayor Gregory Schmidt
Village of Croton on Hudson
1 Van Wyck St.
Croton on Hudson, N.Y.10520

January 5, 2017

Re: NYSDEC Hydrilla Treatment Proposal

Dear Mayor Schmidt:

The WCC and the WAC feel that our formal response to the most recent NYSDEC Hydrilla proposal is a critical one for our Village. It requires our proper balancing of the risk of contaminating the Village water supply by injection of the herbicides in the Croton River to eliminate or manage Hydrilla against the risk of damage to the Croton and Hudson River ecosystems caused by unchecked Hydrilla proliferation.

This is one of the most complex and consequential opinions regarding the issuance of permits for this project.

It is clear to both the WCC and the WAC that we do not have the highly technical expertise and experience required to enable us to properly consider and act upon this crucial matter.

We therefore recommend and request that the Village Board hire in accordance with Sections 178 and 115 of the Village Code, an environmental engineering firm of significant stature, with the required biological, chemical, toxicological, and hydrological knowledge and experience to evaluate the NYSDEC's proposal and report to, consult with, and advise the WCC, the WAC, the Village Engineer and the Village Board so we can all properly fulfill our respective responsibilities to the residents and the environment of the Village.

We believe the report and advice of this consulting firm should include the following matters, as well as any other issues deemed relevant by the consultant to enable us to balance the risks as above mentioned:

1.The level of risk to our water supply, and potential adverse health consequences, caused by fluridone treatment, versus the risk to the water supply and our health resulting from not treating Hydrilla over our aquifer (this should be evaluated without taking into account effects of untreated Hydrilla proliferation on the rest of the Croton and Hudson river ecosystems).

2.The rate of decomposition of fluridone in the underground environment of our aquifer, and how much of this chemical can reasonably be expected to contaminate our water supply (i.e. how much will we be ingesting and if so for how long, and what are potential health risks of all such ingestion).

3. The effect fluridone may have on our water supply when combined with all other water treatment chemicals we use.

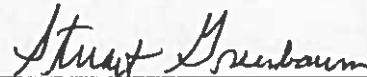
4. Whether, if NYC DEP does not use fluridone or otherwise drastically reduce if not eliminate Hydrilla in the reservoir, the proposed fluridone treatment by the NYSDEC over our aquifer would be ineffective, or would have to continue indefinitely.

5. To what extent does NYCDEP believe placement of benthic mats over the aquifer, while using fluridone and/or endothal only below the Black Rock dam, would be effective.

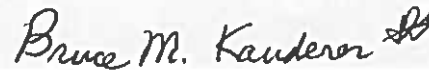
6. If endothal is used as mentioned in the NYSDEC bid proposal, how far below the Black Rock dam should it be injected to be certain it will not infiltrate our aquifer.

We thank you and the Village Board for your consideration of this recommendation.

Very truly yours,



Stuart Greenbaum
Chairman
Water Control Commission



Bruce M. Kauderer
Chairman
Waterfront Advisory Committee

cc: Daniel O'Connor-by hand
Janine King-by hand