2/6/23

**White Lake Mansion House Proposed Development**

Mr. Chairman and Planning Board Members:

Thank you for conducting this public hearing and thank you for considering my remarks. I am Sharon Silverman. My address is 53 Laura Avenue, Smallwood. I am a member of the Smallwood Civic Association, a member of the Association’s Lake Committee, and a Steering Committee member of the citizen's group SmART.

The Environmental Protection Agency (EPA) reports that stormwater runoff is one of the top causes of water pollution in the country. Eventually, all precipitation percolates into the groundwater supply or flows into our waterways. Stormwater can flood septic systems and drain fields, erode stream channels, and damage or destroy fish and wildlife habitats.

EPA studies show that certain fish species die within hours of exposure to stormwater runoff. Contaminants are generated from rain and snowmelt events that flow over land or impervious surfaces, building rooftops, and paved areas, and parking lots. The proposed building footprint for White Lake Mansion House is 16,500 square feet with 4.2 acres of impervious surface. The amount of stormwater runoff that will be generated from an area this large is tremendous. Streams, lakes, and tributaries within our watershed are at serious risk.

As indicated in the attached detail of a map of the local watershed, the blue line running vertically to the left of the development site marks the boundary of the **Swinging Bridge - Mongaup River HUC12 Watershed**.  All of White Lake, Smallwood, and Swinging Bridge Reservoir are part of that watershed. This means that any stormwater runoff, groundwater pollution, and flooding directly affects any land and waterway within that watershed. It is absolutely critical to note that the water used by the JD Water company to provide Smallwood with its seasonal water supply comes in part from the aquifer and water emanating from White Lake Brook and the many other streams that feed Mountain Lake. Also note: Bethel's Sewer Treatment Plant empties its effluent into White Lake Brook.

Nitrogen and phosphorus are the primary pollutants in stormwater runoff. These pollutants are the causes of algae blooms in streams and rivers that pose a potentially fatal risk to any unsuspecting swimmer or pet dog that drinks contaminated water.  Currently, Mountain Lake and White Lake are battling an increase in toxic algae, Ecoli, and elevated nutrients. High levels of Ecoli and toxic algae have resulted in lake closures to swimming throughout New York State including Mountain Lake in Smalwood, Lake Superior in Bethel, and Lake Welch in Rockland County. Even Lake George has not escaped this issue. If nutrient levels continue to increase these waterbodies will move to be categorized by the DEC as “Impaired Waterbodies.”

The questions surrounding this project’s potential stormwater runoff issues further highlight an ongoing problem that the Smallwood Civic Association is having with the health of Mountain Lake. It is critical to consider the proposed project’s use of Bethel’s sewer district, and in turn, the district's capacity is critical to understand and evaluate.  What effect will this project have on the Town’s sewer treatment facility and its function? The effluent from the sewer treatment plant flows through White Lake Brook and into Mountain Lake.  Mountain Lake and its ecosystem are already under great stress from the sewer treatment plant and unregulated discharge into the lake from Smallwood houses and the immediate surrounding area, which consists of single-family houses and bungalow colonies.  Mountain Lake is already experiencing problems related to the sewer district’s effluent. These are issues are related to high nutrient content, toxic cyanobacteria and E Coli. The lake is increasingly oxygen deprived. Water that runs through Mountain Lake makes its way through the Forest Reserve at Smallwood, into Swinging Bridge, and eventually into the Delaware River. Further downstream this water is used as drinking water for many millions of people in the South Jersey and Philadelphia area.

We have learned so much about the environment, runoff pollution, and the negative effects of climate change since 2012 when these plans for development were drafted. We know more about the pollutants, sediments, pathogens, fertilizers, hydrocarbons, and metals that ultimately contaminate and degrade surfaces and groundwater within watersheds. This development, as proposed, is an environmental disaster for our watershed, and thus, in the end, our health, our quality of life and the investment we have in our houses, property, and community.

Thank you.