



# NEW JERSEY HIGHLANDS COALITION

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**YOUR WATER  
YOUR FUTURE**

Sharon M. Osherovitz  
Town Clerk, Town of Ramapo  
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237 State Route 59  
Suffern, NY 10901  
by email: [townoframapoclerk@ramapo-ny.gov](mailto:townoframapoclerk@ramapo-ny.gov)

July 7, 2021

**Re: Comments on the Draft Environmental Impact Statement  
Watchtower Audio/Visual Production Center**

Dear M. Osherovitz-

The New Jersey Highlands Coalitions represents its [116 member organizations](#) in our common interest of protecting the water and the other natural and cultural resources of the New Jersey Highlands region, which 6.2 million people in New Jersey depend upon for some or all of their drinking water.

We are deeply concerned about the potential impacts from this project on the water supply of the bi-state Ramapo River and the Ramapo Basin Aquifer, which is an EPA-designated Sole Source Aquifer (SSA), and which has been determined by the New Jersey state regional planning authority, the New Jersey Water Protection and Planning Council, to be in the highest tier of deficit for Net Water Availability, of up to 7.11 MGD.

Net Water Availability is the calculated maximum ground water supply for human use, of a HUC14 subwatershed, based on existing needs to protect ground and surface water for ecosystem integrity. We note that any discussion of the availability of groundwater, whether there is a surplus, or deficit, is not addressed in the draft EIS, other than stating that "operation of the Proposed Action would result in a total water usage of approximately 151,000 gallons per day. SUEZ has indicated that they have the capacity to service the Proposed Action." (p.159 draft EIS)

Any EIS should address the impacts of the additional .15 MGD presumed withdrawal of groundwater from the Ramapo Valley SSA and whether the location of the discharge of the treated wastewater amounts to a consumptive or depletive use. In the New Jersey Highlands, any major development proposal would be required to show how the proposed withdrawal of groundwater will impact a HUC14 subwatershed if the project is within a HUC14 that the Highlands Council has identified as in or anticipated to be in a deficit of New Water Availability and mitigation measures would be required to be implemented as a condition of approval for the extension sewer service and for an allocation of water supply.

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*In Memorium*

Because of the critical impacts on water quantity posed by new uses, Net Water Availability is the only provision of the Highlands Regional Master Plan that is currently applied equally in the conforming and non-conforming municipalities in the Highlands Planning Area. Approval of additional groundwater withdrawals in deficit HUC14s require very stringent mitigation measures.

Please refer to the attached maps that show:

a) the location of the proposed Watchtower Audio/Visual Production Center in relation to the Ramapo River Basin SSA (Sole-Source Aquifers, DEIS fig 5-6 p.167);

b) Net Water Availability (with legend) and the degree of deficit or surplus, for HUC14s in the northern portion of the NJ Highlands, from the Highlands Interactive Map, accessed July 6, 2021 (the technical basis for establishing New Water Availability can be found in the Highlands Council's Technical Report: Water Resources Vol. II, Water Use and Availability, at [https://www.nj.gov/njhighlands/master/tr\\_water\\_res\\_vol\\_2.pdf](https://www.nj.gov/njhighlands/master/tr_water_res_vol_2.pdf)

c) The above Net Water Availability Map scaled to map "a" and superimposed on map "a", to show the HUC14s in New Jersey that are in deficit within the Ramapo River Basin SSA (note that the surplus/deficit mapping is clipped to municipalities of the Highlands, the HUC14s on the lower right of the map are outside of the Highlands; water availability is not shown).

Today, approximately 10,000 people in Orange County NY, 270,000 people in Rockland County NY, and at least 65,000 people in northern New Jersey communities count on a clean ground water supply from the Ramapo Basin aquifer system, while more than two million additional people in New Jersey rely on the Ramapo River as a source of their surface water supply.

Because there is no institutional coordination between New York and New Jersey on shared water resources does not mean New Jersey does not have a legitimate stakeholder role to play in informing a responsive EIS. An EIS without such an analysis, and requirements for mitigation if warranted, would be irresponsible.

Because the Ramapo River and the Ramapo River Basin SSA are interstate water resources, which are subject to the goals, regulations and standards of the Clean Water Act, we are copying the Administrator of the US EPA Region 2, should they wish to intervene.

Thank you for your attention to this matter.

Respectfully,



Elliott Ruga, Policy & Communications Director

Cc: Matthew Shook, Palisades Interstate Park Commission  
Lisa Plevin, New Jersey Highlands Council  
Walter Mugdan, EPA Region 2