



Responding to Development Projects: Guidance for Watershed Groups

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Introduction: Watershed Group Roles

This guide has been prepared to support watershed groups in understanding land use and proposed development, specifically related to risks to waterways and watersheds.

Municipalities in New York State have clearly defined roles related to land use and development proposals. Under the New York State Constitution, municipalities have "home rule" authority, which allows individual municipalities to have broad control over land use within their boundaries. This authority has benefits as well as challenges. Watershed boundaries do not match municipal boundaries, making regional and watershed-scale planning more difficult.

Community-based watershed groups are uniquely positioned to comment on development proposals, given their deep working knowledge of their local watershed and access to valuable relevant information. The watershed-scale approach taken by watershed groups allows for a holistic approach to identifying and addressing problems and allows for consideration of intersections of environmental and social dynamics as well as impacts on water quality, availability, and access. In a review process with many facets, watershed groups can provide important information and perspectives that might not otherwise be considered.

The goal of this guidance document is to help local watershed groups participate more directly in local land use processes. It walks through the development proposal process, with specific opportunities for watershed groups to engage. These opportunities include education, outreach, and direct public comment.

Pace University's Land Use Law Center has published a <u>Beginners Guide to Land Use Law</u>, which may provide helpful background. For more resources on the municipal land use process, see Appendix A.

Learning about Proposed Projects

Land development can take many forms. Residential development can include individual homes, new neighborhoods, and apartment or condominium complexes, along with their roads and utilities. Common types of commercial development include stores and service businesses with associated parking and other infrastructure. Other types of development include industrial (manufacturing, warehouses), institutional (educational or government facilities), energy (solar farms, energy distribution), and tourism (resorts, campgrounds). Development is most often proposed by a private entity but can also be initiated by government. All these types of development have the potential to affect water resources.

Development projects can often be unknown to community members until after formal applications are submitted, or even when the review process has advanced or ended. It is

beneficial for watershed groups and interested individuals to learn of proposals as early in the process as possible. Initial pre-application presentations and/or discussions often occur at municipal board/council meetings and/or planning board meetings. Community members concerned about developments should monitor the municipal, zoning, and planning board meeting notes and agendas for information about upcoming project proposals and applications. Building strong relationships with board members is also beneficial, as relationships could develop to a place where boards reach out to local watershed groups to get their feedback on proposals.

There is no need to wait for a public hearing before contributing comments, but part of monitoring efforts should include being on the lookout for public hearing notices. Such notices may be found in the following sources:

- Municipality's website
- Newspaper legal notices
- Direct mailings to homes near the development site
- Bulletin board at town hall

It is also helpful to subscribe to the <u>New York State Department of Environmental</u> <u>Conservation's weekly Environmental Notice Bulletin (ENB)</u>, which is DEC's official publication of proposals and actions, including SEQR and other notices, DEC hearings, and completed DEC applications. To subscribe to the ENB, visit <u>DEC's newsletter subscription page</u>, and under Announcements and Press Releases, select: Environmental Notice Bulletin.

To find out more about a particular development proposal, a good place to start is typically the municipality's planning or zoning office. They may require submittal of a Freedom of Information Law (FOIL) request to document your request. It can take some time to process FOIL requests, so it is good practice to leave plenty of time. More information on FOIL is available from the <u>Committee on Open Government</u>.

The Municipal Review Process

Agency Review

Development proposals generally require one or more approvals or permits. Review and decision-making are public processes, and you can provide input. Accompanying these reviews is an environmental review pursuant to the State Environmental Quality Review Act (SEQRA), which may also offer opportunities for public input.

Watershed groups can submit information and comments to the agencies making decisions. For most projects, the primary agency will be the municipal planning board, but there may be other boards or agencies involved. Some approvals that may be required include:

- Site plans and special use permits: Commercial, industrial and multifamily (apartment/condo) development projects typically require site plan review by the Planning Board, and they may also require a special use permit.
- Subdivisions: A request to subdivide land into smaller lots is reviewed by the Planning Board and requires a public hearing. For residential housing projects, subdivision review is typically the main review process. Individual homes often do not require site plans, so the locations of new homes and roads are considered in the subdivision process.
- Variance Requests: If a project, large or small, requires an exception to the zoning rules, it can request a variance from the Zoning Board of Appeals.
- Rezoning or changing local zoning laws: If the type of project is not currently allowed under the zoning, the municipality's legislative board could consider a zoning change. Zoning changes must be adopted by the legislative board the town board, city council, or village board of trustees.

Many municipalities have a Conservation Advisory Council, Conservation Board, or similar committee that is tasked with reviewing development proposals to flag environmental concerns. These committees can be helpful contacts for watershed groups.

Other non-municipal boards may have a role as well, and you can submit information or comments. The following are some common examples:

- NYS Department of Environmental Conservation wetlands disturbance, wastewater discharges, stormwater, endangered species
- County Health Department wells and septic systems
- County Planning Board some projects require review for county-wide or intermunicipal impact

Remember that you can always submit comments to government officials, so if you are unsure when there will be an official comment period, go ahead and submit your input.

To learn more about local development laws, Partnership for the Public Good's <u>Land Use and</u> <u>Zoning Law: A Citizen's Guide</u> is a helpful resource.

SEQR environmental review

The State Environmental Quality Review Act requires an environmental review of actions undertaken, funded or approved by a government agency in New York State. State regulations provide a list of "Type II" actions that are exempt from review, but most development projects are subject to SEQR. In cases where multiple agencies have approval authority for the same project, one agency will serve as "lead agency" for SEQR.

SEQR requires a lead agency to take a "hard look" at potential significant environmental impacts. The requirement is not limited to regulated resources Construction in or near wetlands

(whether or not regulated), construction that could cause erosion or increase runoff, and new uses that pose pollution risks are some of the many environmental impacts that could be relevant in a SEQR review.

The lead agency must evaluate relevant information to make a determination of significance. The determination can be a negative declaration (or "neg dec"), meaning there is no potential for a significant adverse environmental impact and SEQR is complete, or a positive declaration ("pos dec"), meaning that there is the potential for one or more significant adverse environmental impact. Larger projects may receive a pos dec, which leads to a more extensive process with opportunities for public input. There is no requirement to hold a hearing before making a determination of significance, so commenting early is advised.

State Environmental Quality Review Act (SEQR) Resources

- <u>Stepping Through the SEQR Process</u>
- <u>SEQR Handbook</u> (long-form guide)
- SEQR Cookbook (short-form guide)

Understanding Your Watershed's Conditions and Issues

In order to respond to development proposals, it's important to have an understanding of the watershed's current condition and any specific issues that may arise from development. This work can be proactive and may be done in advance of any specific development proposal. It can also be reactive and based on the details of a proposed project.

Depending on the size of the watershed and the project, it may be most valuable to identify the specific subwatershed that will be impacted most by the project. For example, the Tin Brook is a subwatershed of the larger Wallkill River watershed. A project in the Tin Brook watershed would likely cause more acute effects on the Tin Brook than the Wallkill River.

Mapping Tools

There are many publicly available interactive mapping tools that may provide valuable information. As a starting point, we recommend checking the Hudson Valley Natural Resource Mapper, the NYS DEC Environmental Resource Mapper, the DECinfo Locator, NYS DEC Division of Water Water Quality Portal, and USGS StreamStats. More information about each tool is below. Depending on the specific details of the project, you may also find additional information from other resources.

For an example of how each how the first three New York State web-based mapping tools can be used to better understand a specific watershed, see the "<u>Get to Know Your Watershed</u>"

presentation by Emily Vail, Executive Director, Hudson River Watershed Alliance, originally presented at the 2020 Wallkill River Summit.

NYS DEC Hudson River Estuary Program: Hudson Valley Natural Resource Mapper

The Hudson Valley Natural Resource Mapper is an online, interactive tool designed to help identify and understand important habitat and water resources, the connections between them, and their broader regional context. It was developed by the NYS DEC Hudson River Estuary Program, in partnership with Cornell University. This tool is intended for general information and planning purposes and does not indicate the extent of DEC regulatory authority.

- Access the Mapper: <u>https://gisservices.dec.ny.gov/gis/hvnrm/</u>
- More information (including webinars on how to use the mapper): <u>https://www.dec.ny.gov/lands/112137.html</u>
- Using the Hudson Valley Natural Resource Mapper PDF: <u>https://gisservices.dec.ny.gov/gis/hvnrm/help/hreHelp.pdf</u>

NYS DEC: Environmental Resource Mapper

The NYS DEC's Environmental Resource Mapper is an interactive mapping application that can be used to identify some of New York State's natural resources and environmental features that are state or federally protected, or of conservation concern. These maps are intended as one source of information for landowners, land managers, citizens, local officials, and project sponsors engaged in land use decision making, conservation, or environmental assessment. The Environmental Resources Mapper does not show all natural resources which are regulated by NYS DEC, and for which permits from NYS DEC are required.

- Access the Mapper: <u>https://gisservices.dec.ny.gov/gis/erm/</u>
- More information: <u>https://www.dec.ny.gov/animals/38801.html</u>
- Using the Environmental Resource Mapper PDF: https://gisservices.dec.ny.gov/gis/erm/help/ermHelp.pdf

NYS DEC: DECinfo Locator

The DECinfo Locator is an interactive map that provides access to DEC documents and public data about the environmental quality of specific sites in New York State, as well as outdoor recreation information. Among other datasets, this mapper includes information on water infrastructure and permits, Waterbody inventory and Priority Waterbody List (WI/PWL) fact sheets, potential environmental justice areas and disadvantaged communities, and environmentally sensitive areas. The data on this site are subject to change; they are provided as is, and believed to be accurate, but accuracy is not guaranteed.

- Access the DECinfo Locator: <u>https://gisservices.dec.ny.gov/gis/dil/</u>
- More information (including a Help Video and detailed Help PDFs): <u>https://www.dec.ny.gov/pubs/109457.html</u>
- Using the DECinfo Locator PDF: <u>https://www.dec.ny.gov/docs/administration_pdf/decinfolocatorhelp.pdf</u>

NYS DEC: Division of Water Monitoring Data Portal

The Division of Water Monitoring Data Portal provides access to current and historical stream and lake monitoring data in an easy-to-use map. The purpose of this portal is to provide access to historical monitoring data from the NYSDEC Division of Water Bureau of Water Assessment and Management.

- Access the Portal: <u>https://nysdec.maps.arcgis.com/apps/webappviewer/index.html?id=692b72ae03f14508</u> <u>a0de97488e142ae1</u>
- More information: <u>https://www.dec.ny.gov/chemical/23848.html#Water</u>
- Using the Portal: see the left sidebar menu within the Portal here: <u>https://nysdec.maps.arcgis.com/apps/webappviewer/index.html?id=692b72ae03f14508</u> <u>a0de97488e142ae1</u>

USGS: StreamStats

StreamStats is a web application developed by the U.S. Geological Survey (USGS) that provides access to an assortment of Geographic Information Systems (GIS) analytical tools that are useful for water-resources planning and management, and for engineering and design purposes. The tool allows users to delineate a watershed based on selecting a specific site, which can be useful to better understand sub-watersheds and more local drainage patterns. StreamStats also provides basic characteristics and flow estimates for the delineated watershed.

- Access StreamStats: <u>https://streamstats.usgs.gov/ss/</u>
- More information: <u>https://www.usgs.gov/streamstats</u>
- How to guides: <u>https://www.usgs.gov/streamstats/how-guides</u>

Local Watershed Information

As a watershed group, the organization may have unique access to information which otherwise may not be otherwise accessible to decision-makers, but could help better inform the review process. Consider if your group has information such as:

• Watershed characterizations, plans, or other watershed-scale studies.

- Municipal, county, or regional plans or studies that include areas within the watershed (more information below).
- Water quality or environmental monitoring data.
- Relevant research projects.
- On-the-ground observations from watershed group members or residents documenting waterways and the local area. This could include photos, videos, etc. documenting history and change over time. (For example, the <u>MyCoast NY</u> website and app compiles and maps photos of flooding, which could be especially valuable to show areas that are vulnerable to flooding but outside of mapped floodplains.)
- Information about the watershed and/or resources of concern from upstream or downstream municipalities.

Watershed groups often maintain files that include watershed-scale characterizations, plans, reports, or research. We recommend checking with the leaders and members of your local group to see what relevant information may be available.

The Hudson River Watershed Alliance maintains a list of watershed groups, contact information, and key planning documents here: <u>https://hudsonwatershed.org/watershed-groups/</u>

Municipal Plans

Municipal planning documents may also be helpful in understanding conditions, priorities, and issues. These are often accessible on a municipality's website.

Municipal review of projects focuses on compliance with zoning. Zoning laws are regulatory, and projects must comply with zoning to be approved. Zoning laws generally establish land use districts in a municipality and specify uses that are allowed in each area, along with dimensional regulations such as required lot sizes and building location on the lot. They may also provide design guidelines, parking requirements, environmental performance measures, as well as specifying the review process and approval criteria.

Comprehensive Plans provide a broad view of the municipality's plans and priorities for land use. Zoning laws must align with the comprehensive plan. Individual project decisions, however, are typically evaluated on the project's conformance with zoning, not the comprehensive plan.

<u>Local Waterfront Revitalization Plans</u> (LWRPs) establish a vision for a coastal waterfront area. An LWRP is a planning and regulatory tool allowing communities to refine statewide coastal policies to apply to their locale. Communities with an LWRP typically have a Waterfront Consistency Review Law that establishes which local actions are subject to review by a local committee or official for consistency with the LWRP.

Natural Resources Inventories and Open Space Plans provide valuable context on natural resources and recommendations, but are not regulatory documents. A Natural Resource Inventory compiles information on naturally occurring features within a given locality, such as geology, soils, streams, wetlands, forests, and wildlife, and may include cultural and recreational resources as well. Open Space Plans establish a municipality's land conservation priorities, justifications, and strategies. These plan are best used to conserve natural areas and wildlife across a community to allow for interconnection beyond property lines.⁵

There are many other different types of municipal plans that may be relevant, depending on the site. These may include Drinking Water Source Protection Plans (DWSP2), aquifer and groundwater plans, habitat maps, farmland protection plans, climate vulnerability assessments, hazard mitigation plans, road-stream crossing management plans, and more.

Commenting on Development Proposals

Writing to decision-makers can be done as a means of educating them about the risks or benefits of a proposal, or formally as a means of submitting official public comment like during the draft scoping phase of the SEQR process. Some letters will take on an informative tone, while others may be written persuasively, or to request inclusion of certain information or study questions into a review process.

Appendix B provides guidance on composing your letter, Appendix C shares several sample letters, and Appendix D includes a letter template.

Additional Community Engagement Methods and Approach

In addition to engaging with decision-makers such as boards and agencies, it's wise to educate the public about the proposal to build support for your group's position (if you have one). Engaging the public can be beneficial as a means to grow and demonstrate support for your position, which can be accomplished through letters of support/opposition, petitions, phone call campaigns to decision-makers, turning out large groups to public hearings/information sessions, etc.

It's important to ensure any public facing materials such as presentations, fact sheets, letters to the editor, social media posts, etc. are fact-based and explain the proposal and process as clearly as possible. With materials engaging the public, it's important to remember the average community member is not an expert on the project nor on approval processes. Information should be written clearly and concisely, and be stated simply, spelling out acronyms and explaining any unknown terms.

You may also consider organizing a few weekend or evening sessions to knock on doors in the affected community(ies) to educate the public and if there is a public hearing, ensure they are aware of the issue and have the information they need to participate in the hearing. Canvassing is also an effective tool to build a base of supporters, invite the community to an event, and generally expand the reach of your efforts, recruit new members to participate in your organization both in the short and long-term. In some cases, new groups form out of an issue-centered effort.

Some elements to consider including in a fact sheet, presentation, or other outreach materials include:

- General Considerations:
 - What are the values and interests of different types of stakeholders in your community?
 - These may include business owners, farmers, sportspeople, environmentalists, neighbors, streamside landowners, etc.
 - For example, if a proposal will potentially affect groundwater supplies, you may wish to reach out to local farmers about potential effects on irrigation as a result of the groundwater impacts.
 - What level of familiarity does each type of stakeholder have to the applicable decision-making process? Cater outreach materials to your audience, airing on the side of explaining more instead of less
- For zoning amendments:
 - What neighborhoods will be affected?
 - How will the proposed change impact different populations within the community?
 - Are there environmental or social impacts to these proposed changes?
 - Who will benefit from these changes?
- For development projects:
 - Project summary what is the proposal?
 - Size, Scale, and Location of impact where will the project be? How large will it be? What neighborhoods will be impacted? Include a map if possible
 - Does the project appear to comply with the comprehensive plan, LWRP, zoning?
 - Are there any environmentally or culturally sensitive areas nearby?
 - Who is proposing the project?
 - Where in the review process is the project?
 - What entity is the lead agency, and what other entities have to grant approvals for the project?

Appendix A: Other Land Use Resources

Recommended Planning Resources:

- Pace University Land Use Law Center: <u>Beginner's Guide to Land Use Law</u>
- Hudson Valley Regional Council & Pace Land Use Law Center: <u>Land Use Strategies for</u> <u>Protecting Drinking Source Water - Resource Guide</u> (2021)
- Partnership for the Public Good: <u>Land Use and Zoning Law: A Citizen's Guide (Buffalo & Erie County)</u> (2018)
- Hudson River Estuary Program: <u>Conserving Natural Areas and Wildlife in Your</u> <u>Community: Smart Growth Strategies for Protecting the Biological Diversity of New</u> <u>York's Hudson River Valley</u> (2008)
- Lower Hudson Coalition of Conservation Districts: <u>Reviewing Stormwater Management</u> in Site Design: A Guide for Planning Board Members (2015)
- NYS Department of State: <u>Creating the Community You Want: Municipal Options for</u> Land Use Control (2022)

County Resources:

Albany County:

<u>Albany County - Planning Department</u>

Columbia County:

- <u>Columbia County Planning Department</u>
- Columbia County GeoSpatial Data

Dutchess County:

- Dutchess County Planning Department
- Dutchess County Municipal Zoning Maps

Greene County:

- Greene County Planning Department
- Greene County Plans + Studies

Orange County:

- Orange County Municipal Resources, Zoning Maps
- Orange County Planning Department

Putnam County:

- Putnam County GIS Hub (Parcel Viewer, Open Space, Transportation, etc)
- <u>Putnam County Planning Department</u>

Rensselaer County:

• <u>Rensselaer County - Economic Development and Planning</u> Schoharie County:

Schoharie County - Planning + Zoning Information

Schenectady County:

• <u>Schenectady County - Economic Development + Planning</u>

Ulster County:

• <u>Ulster County - Local Law Directory</u>

• <u>Ulster County - Land Use Referrals</u>

Westchester County:

- <u>Westchester County Land Use Development</u>
- Westchester County Local Planning Law Resource Guide
- <u>Westchester County Publications</u>

Appendix B: How to Write a Letter

Writing the Letter: General Tips and Considerations

- Limit jargon wherever possible, and fully write out acronyms the first time, explaining any terms where necessary.
- Begin persuasive or informative paragraphs within the letter, include 1-2 sentences to introduce the watershed group and briefly summarize the risks to the watershed
- Maintain focus on highlighting environmental consideration and provide evidence and details for your concerns, instead of providing a laundry list of different areas of concern.
- Cite to specific provisions of local or state law where possible, and references to facts supporting your arguments should always be included.
- Include any information from the above listed mapping resources, comprehensive plan, zoning laws, or Local Waterfront Revitalization Plan, or the watershed group's own information.
- Contextualize your arguments within widely supported ideas and shared values such as clean water, and reference any supporting community visioning or planning documents such as a municipal comprehensive plan.
- Be thoughtful about when and how to ask questions. If commenting on a draft scope, questions may be appropriate. Whenever possible, stick to providing information and making statements, which will be more powerful and useful.

Note, if you are writing on a SEQR related proposal, review pages 7-9 in the <u>Land Use and</u> <u>Zoning Law: A Citizen's Guide, Partnership for the Public Good</u>, which provides a list of several components of successful advocacy.

Writing the Introductory Paragraph

A strong introduction that not only quickly tells the reader that the letter *is* important, but *why* this letter is important is critical. This may be done in three parts: (1) present your "ask" up front; (2) provide a clear, concise description of the problem or risk posed to the watershed by the opposed action; and (3) close strong.

The Ask: What and How

Including the ask up front accomplishes two objectives: (1) it tells the reader why you're writing them a letter in the first place, and (2) it tells them why they should keep reading. It should be concise and include the specific action that you are requesting the reader take: the actual ask. It should also inform the reader upon what power they can take that action: the authority. In short, the ask tells the reader what you want them to do, and why they're allowed to do it. An example would look like, "We are asking you to take action to disapprove the site plan based upon your authority under Zoning Code Section ___." The reader can then continue to the rest of your letter, knowing that this is its context and objective.

The Roadmap: Why

The second part of the paragraph is the roadmap. This portion of the paragraph succinctly tells the reader what the body of the paragraph will be demonstrating in full. The ask tells the reader what you want them to do, and how they're authorized to do it. The roadmap helps establish why they should do it. An effective way to do this is by linking together three items: (1) the opposed proposal or action, (2) a negative environmental impact, and (3) the removal of some ecosystem service (*see* Appendix A below). Do not get overly specific in this sentence. Remember this is a brief summary of the body of the letter, and the rest of the letter will fill out that substance. One example might look like, "The proposal for the Pine Creek Shopping Mall may negatively impact this regionally important drinking water supply by necessitating the filling in of wetlands that currently help filter out pollutants."

Wrapping up the first paragraph

The closing sentence should briefly restate why your recommendation should be followed. It is worth remembering that arguments based in public policy will be far more effective than those based on emotion, even when particular officials may be environmentally friendly. This is especially true when the public policy argument can reiterate to the reader that they have the authority to take that action. This authority can either come from state or local law. Thus, a good close might look like, "Prevention of further degradation of this water supply is necessary to protect public health and to ensure a satisfactory community environment".¹

Body of the Letter & Closing

The body of each letter will vary widely. These variations are caused by the differences in project proposals, geographic contexts, the goals of the groups writing the letters, and the audiences that they are written for. A common adage in writing is, "Tell the reader what you're going to tell them, tell them, and then tell them what you've told them." The introduction accomplishes the first point, the body the second, and the conclusion the third. The conclusion should succinctly reiterate the letter's main point, without parroting language already used earlier. This is your last opportunity to impart upon the reader what action you want them to take. Finally, it is generally good practice to thank the reader for their time and consideration.

You may also provide links to or copies of supporting information.

For samples of letters, see Appendix C. For a letter template, see Appendix D.

¹ N.Y. Gen. Mun Law sect. 239-1

Appendix C: Sample Letters to Decision-Makers

These letters were written by watershed groups and nonprofits in response to proposals posing risks to the local ecosystem and human communities. Though each letter ranges in tone, each letter centers science, laying out concerns clearly one at a time, citing outside resources and information, and concludes with a clear ask.

Sample Letters:

Sparkill Creek Watershed Alliance - Letter to the Town of Orangetown Planning Board <u>Re: South Corners Plaza Application PB#17-37 – Parcel 74.11/2/47</u> - 2021

Moodna Creek Watershed Intermunicipal Council - Letter to NYS DEC <u>Re: Comments of the Village of Kiryas Joel Water Supply Permit Application for Mountainville</u> <u>Pump Station – Application ID</u> - 2013

Catskill Mountainkeeper - Letter to the Village of Saugerties <u>Re: Water Supply</u> (2022)

Appendix D: Watershed Group Letter Template

Below is a template for a letter that can be adapted to suit your own needs. Keep in mind that many of the issues with specific proposals are context specific. This template aims to serve as a jumping off point and guide for your own letter drafting.

Date Address Line 1 Address Line 2 Address Line 3

RE: [project name] Parcel Number if available

Dear [title, last name]:

Thank you for the opportunity to submit a public comment on the pending [project proposal name]. On behalf of [organization name], I request you to [action: disapprove, approve, consider more information] the site plan for [project name] using your authority under [statute]. The proposal for [project name] may negatively impact this regionally important [natural resource] by [describe ecosystem service(s) to communities that would be lost]. Prevention of further degradation of this [natural resource] is necessary to protect public health and to ensure a 'satisfactory community environment.'

Our group [organization name] is dedicated to improving the appreciation for and stewardship of [watershed name]. Thus, [project name] directly impacts our goal by threatening the integrity of [watershed name]

1. [Brief sentence explaining the first major concern]

[Provide a more detailed accounting of this first major concern. It is recommended that you include specific provisions from state or local laws. Graphs and figures may be helpful as well. If the concern has engineering or hydrology components, specific references to this are recommended as well. Remember, officials and board members are usually not experts on these topics. Be thorough in your informing them on the topic without including a burdensome amount of detail. Concision is generally the best course.

2. [Brief sentence explaining the second major concern, if applicable]

[Provide a more detailed accounting of the second major concern, if applicable, in the same way as above. This can then be repeated as many major issues as are appropriate to raise.]

We appreciate [name of department/board]'s dedication to protecting and preserving water resources in [municipality name]. We request that you please use your authority to the maximum extent possible to continue to protect these water resources in this current case and future cases. We thank you for your time and your consideration of these comments and concerns.

Sincerely, [Your name, organization]