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June 30, 2023

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Mayor Villafane and the Sea Cliff Village Board of Trustees  
300 Sea Cliff Avenue  
PO Box 340  
Sea Cliff, New York 11579

Dear Mayor Villafane and the Sea Cliff Village Board of Trustees:

Thank you for the opportunity to comment on the detailed work that has gone into the draft of the Sea Cliff Comprehensive Plan (Plan). The Coalition to Save Hempstead Harbor (CSHH) is supportive of both the measured process used to create the document and the shared vision of environmental responsibility the Plan articulates. The Plan's call for Sea Cliff to "become an environmental leader by promoting cutting-edge sustainability strategies Village-wide" in chapter 10 is particularly encouraging.

While we are generally supportive of the overall Plan, some chapters deal more directly with the nearly four decades of environmental stewardship the CSHH has provided to harborside communities like Sea Cliff. Our comments on the following pages highlight some areas of particular significance and in some cases request more in-depth recommendations than the current draft Plan considers.

Please note that there are many instances throughout the document where footnotes do not match up to the numbering in the text. Also, some figures lack a source and date, and others are difficult to read in both digital (with magnification) and printed format. It would be helpful if all figures were sized appropriately to maximize legibility.

Sincerely,

Michelle Lapinel McAllister  
Programs Director

Lisa Cashman  
Associate Director

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## **CHAPTER 4 TRANSPORTATION**

Should additional parking be required (such as for businesses along Glen Cove Avenue), green infrastructure requirements should be considered. For example, to the extent practicable, permeable surfaces, xeriscaping, bioswales, and other techniques that will allow absorption of stormwater should be included.

In addition to the “Safe Routes to School Program,” dedicated bicycle lanes should be considered in other areas of the Village along with bicycle racks.

## **CHAPTER 5 HOUSING**

### ***Conservation Subdivision***

We support the Plan’s recommendations regarding the North Shore Country Club, including protections of open space by upzoning this area to a minimum lot size of two acres and adopting New York State’s cluster subdivision guidelines for this property. Potential high-density development of this area is of particular concern due to its proximity to Hempstead Harbor and the risk of increased stormwater runoff and associated adverse water-quality impacts. Further, the contiguous acres of open space on this property allow recharge of the aquifer and provide wildlife corridors. Green open spaces have also been shown to have a significantly lower ambient temperature (see <https://www.epa.gov/heatislands/learn-about-heat-islands>), and preserving these spaces is increasingly important in the context of global warming mitigation efforts. We are supportive of all efforts to preserve and increase green open spaces.

## **CHAPTER 6 UTILITIES**

### **Sewage Disposal Systems**

At page 80, the first paragraph starts with: “The Village of Sea Cliff has been working for years to add sewage lines that allow households and businesses to connect to the county sewer and discontinue individual septic systems. While the ultimate goal of the Village is to connect every property in Sea Cliff to a sanitary sewer line....” Installing a sewer system for all of Sea Cliff would be extremely costly. In addition, widespread sewerage may reduce the amount of water available to recharge the aquifer. The impacts are not fully understood. Currently, one of the biggest contributors of nitrogen to Hempstead Harbor is failing septic systems. Because the Glen Cove sewage treatment plant has installed a nitrogen removal system, it is able to reduce the nitrogen pollution discharged into Hempstead Harbor. However, it is worth confirming the effectiveness of the system, particularly if higher volumes of sewage need to be treated.

Alternatively, advanced septic systems using innovative technology for nitrogen removal should be just as strongly considered as sewerage. Increased efforts should be made to inform homeowners of the grants that are available now to help them upgrade their septic and cesspool systems rather than waiting to expand sewer connections, which could be many years down the line.

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The Plan articulates many of the factors contributing to the fragility of the potable water supply. We strongly support efforts to protect our sole source aquifer by codifying low-impact development and strong water conservation strategies in the zoning codes.

A regional study is needed for aquifer protections to understand impacts and develop recommendations to balance sewerage with maintaining a fully charged water-supply system. The impacts of development on the aquifer should be included in this study. Efforts to advocate for recycling water for specific usages such as irrigation of parks and golf courses around Nassau County should be considered (see [https://www.dec.ny.gov/docs/water\\_pdf/linapwaterreuse.pdf](https://www.dec.ny.gov/docs/water_pdf/linapwaterreuse.pdf)).

At page 81, third paragraph in the blue box regarding “Allies and Resources to Improve Hempstead Harbor Water Quality,” the second to the last line should state “...encourages the public to participate in conservation efforts.”

### **Solid Waste**

We encourage stronger recommendations for recycling and solid waste and, in particular, an analysis of the efficacy of the current single-stream recycling processes. Efforts to increase community participation in recycling and composting should be implemented such as public education campaigns or incentives. We encourage providing more information to residents regarding the management of solid waste and recycling so they understand how their actions in this area affect the environment, water quality, and local expenses and taxes.

### **Electricity and Energy**

At page 82, first paragraph, the accuracy of the statement regarding PSEG’s authority to operate the natural gas infrastructure, rather than National Grid, should be checked. It is our understanding that National Grid currently operates the natural gas infrastructure.

It may be worth noting that the New York State Legislature passed the All-Electric Building Act in May 2023, which prohibits gas hookups in new buildings up to seven stories tall starting in 2026. It will apply to taller buildings in 2029.

## **CHAPTER 10 NATURAL RESOURCES AND THE ENVIRONMENT**

### **Water Resources**

#### ***Hempstead Harbor***

At page 132, second paragraph, line 7, note that the Hempstead Harbor Protection Committee (HHPC) is represented by *nine* municipalities, not seven.

Also note at page 132, second to last paragraph, there are some misstatements regarding the Coalition to Save Hempstead Harbor and confusion with the Hempstead Harbor Protection Committee. Though we are pleased to work closely in partnership with the Hempstead Harbor Protection Committee and our missions are closely aligned, the Coalition to Save Hempstead Harbor is a nonprofit environmental organization established prior

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to the Hempstead Harbor Protection Committee. CSHH is a technical advisor to and nonvoting member of the HHPC. We suggest that the last paragraph, which mentions the 2004 Management Plan for Hempstead Harbor be moved above to the discussion of the Hempstead Harbor Protection Committee and that the reference to the “1998 Water Quality Plan” be changed to the “1998 Water Quality **Improvement** Plan.”

With respect to the paragraph beginning with “The Coalition to Save Hempstead Harbor (CSHH)...,” the Plan misstates the launch of the CSHH water-monitoring program, which began in 1992. Also, while the Scudder’s Pond Improvement Plan was completed in 2006, the actual restoration occurred from 2013 to 2014. Please change the paragraph as follows to accurately depict CSHH’s work and relationship with HHPC:

“The Coalition to Save Hempstead Harbor (CSHH) is a nonprofit environmental organization (also mentioned in Chapter 6) that focuses on identifying and eliminating environmental threats in and around Hempstead Harbor. The CSHH developed a water-quality monitoring program in 1992, which it has continued to coordinate and expand. The data collected from the program has been used by the HHPC to address watershed-management issues and fulfill a recommendation under the HHPC’s 1998 Water Quality Improvement Plan to have continuous and consistent water-quality monitoring. In 2006, the HHPC assumed financial responsibility for the water-monitoring program, while CSHH continued as the contractor planning, coordinating, and implementing the program. The data collected from the water-quality program was integral to intermunicipal restoration initiatives, including the restoration of Scudder’s Pond in **2013-2014** (see next section).”

### ***Groundwater***

We were encouraged to see Sarah Meyland’s report “Water Supply Sustainability for Hempstead Harbor Communities” commissioned by CSHH referenced on pg. 133 of the Plan. However, an integral aspect of this report was omitted, i.e., **NYS DEC established a 15% reduction in water usage** to support the sustainable use of our sole source aquifer. We believe a final plan should address how the Village will work with the Sea Cliff Water District to achieve this reduction. Additionally, we encourage the Village to review the full list of recommendations for potable water sustainability in the above-mentioned report and consider including more of these recommendations in the final Plan.

Any future real estate development should be considered in light of whether the available water resources exist regionally to support the proposed development. We encourage the Village to consider potential limits to real estate development after a careful regional study of resource limitations. A moratorium on development could be considered in advance of this study.

### ***Inland Surface Water***

At page 133, under “Inland Surface Water,” second line, note that the title of the HHPC’s 1998 plan is the “Water Quality **Improvement** Plan for Hempstead Harbor.”

### ***Water Quality Issues and Opportunities***

Regarding references to fertilizer and native plants at page 134 (last two paragraphs), the CSHH strongly supports a shift towards prioritizing native plants for landscaping and efforts to reduce or eliminate the use of fertilizers. The many benefits of native plants are well articulated in the Plan. Fertilizer usage is among the top

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contributors of nitrogen pollution to Hempstead Harbor. We support all of the recommendations to reduce the use of fertilizers.

### **Sustainability Efforts**

The final plan would benefit from clearer recommendations about Sea Cliff DPW's use of yard waste. It is our hope that yard waste and kitchen vegetable waste become part of a village-wide composting effort.

With respect to recommendation 10.4, page 138, we would stress the necessity of obtaining engineering reports that address soil conditions, drainage, vegetation, and other conditions of the 325 Prospect Avenue property and other problematic areas in the village.

## **CHAPTER 11 CLIMATE CHANGE, SEA LEVEL RISE, AND STORMWATER MANAGEMENT**

Although we agree with the recommendations included in this section, we feel that post-storm conditions have not been addressed. Detailed plans are needed to handle severe post-storm conditions such as landslides and widespread flooding.

## **CHAPTER 12 FUTURE LAND USE PLAN AND IMPLEMENTATION**

Current and future land use issues are a quickly evolving area requiring vigilance and adaptability to innovations and best practices related to climate change, engineering advancements, and sustainability. It is our recommendation that the Village remain judicious about opportunities to be leaders in this area and forward-thinking about the risks associated with the current trends of overdevelopment on the peninsula and other factors unique to shoreline communities as articulated throughout the Plan.

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