



ACTION FOR TOMORROW'S ENVIRONMENT

Working to preserve a sustainable world

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February 4, 2004

The Honorable Andy Spano
County Executive

The Honorable Bill Ryan
Board of Legislators, Chair

The Honorable Marty Rogowsky
Board of Legislators, Chair Energy and Economic
Development and Legislation Committees

The Honorable Tom Abinanti
Board of Legislators, Chair Environment Committee

Re: Recommendations for Energy and Environmental Initiatives for 2004

Dear County Executive Spano and Legislators Ryan, Rogowsky and Abinanti:

We commend both the Westchester County executive and legislative branches on their proactive efforts to protect the environment over the last few years. County action has included many significant initiatives including the passage of the pesticide neighbor notification law and the sunset provisions for use of pesticides by the county, the Legacy program to protect open space, establishing a goal of purchasing 25% green power by 2010, a comprehensive public education campaign on water quality protection, the work on expanding and improving the trail systems in the county, the initiative to implement ISO 14001 at the airport, the expansion of recycling efforts and of the Household Chemical Clean-up Days, and legislation to reduce mercury in the environment. All of these very significant accomplishments form an essential part of creating a sustainable future, but more work must be done and much of that work must be done at the local level. "Think globally and act locally" has never been a more apt expression of the responsibility each level of government must accept.

To implement the needed changes the executive and the legislative branch must work hand in hand, each using its own expertise and scope of authority. Input from stakeholders and the general public should be an integral part of the process.

In order to advance towards sustainability in Westchester we propose that, (1) the county adopt a resolution establishing sustainability as a measuring stick against which decisions are made, (2) that a process be commenced for the development of a consensus as to the approach to be taken by the county to achieve a sustainable future; and (3) that certain specific executive and legislative actions discussed below be undertaken in the near term to protect our environment now.

1. Sustainability Resolution and Sustainability Plan

The far sighted Patterns for Westchester released by the County's Planning Department in 1996 set out a road map for the physical development of the county to provide a range of strategies that would nurture environmental health, economic growth and the quality of life in Westchester. Since that excellent document was released, much work has been done around the world and in many communities in the United States to address not only physical development but all of the other aspects of development that are essential to a sustainable future. That work must be done in Westchester.

Sustainability and sustainable development were widely discussed at the United Nations Conference on Environment and Development (the Earth Summit) in Rio in 1992. From this summit emerged Agenda 21, which is the global plan for achieving sustainable development. Recognizing that successful implementation rests on the acts of government and that many of the problems and solutions have their roots in local activities, Agenda 21 contains a call for local governments to undertake a consultative process with their population to achieve consensus on the approach to be taken to achieve sustainability.

“Sustainability” has been used as a catchall for a great many things. The most commonly used definition is that from the 1987 World Commission on Environment and Development: “development that meets the needs of the present without compromising the ability of future generations to meet their economic needs”.

The International Council on Local Environmental Communities (ICLEI) has a program called Communities 21, which is its local Agenda 21 program for the United States, through which it offers resources and technical support to communities embarking on Agenda 21 style initiatives. Over 50 governmental entities in the United States are members of ICLEI. See iclei.org Scores of governmental entities in the United States have adopted resolutions establishing their commitment to a sustainable future. Many have completed the deliberative process and have sustainability programs in place.

A wealth of information, guidance and funding sources on sustainability are available. The Department of Energy has published a simple “Ten Step Guide to Sustainability” to assist in developing a sustainability program . See, <http://www.sustainable.doe.gov/management/tensteps.shtml>

ICLEI has collected helpful sites on its TOOLS FOR A SUSTAINABLE COMMUNITY page at <http://www.iclei.org/LA21/ONESTOP.HTM> (this site includes links to sustainability policies adopted by other local governments in the United States.) The Sustainable Communities Network provides a great deal of helpful information in its “Placemaking: Tools for Community Action” at <http://www.sustainable.org/>

In assessing how to approach the task of organizing such a sustainability effort in Westchester, serious consideration should be given to becoming an active participant with an established organization that facilitates such work. ICLEI is the leader in this field but other groups such as the Natural Step are available for the task.

The ultimate goal is the development of a sustainability plan for the county as broad in its vision as Patterns. In order to commence the effort, Westchester should adopt a resolution now setting the groundwork for the development of the plan. While much input will go into the final language of the resolution, it is urged that Westchester’s affirmation of the basic principles of sustainability include language which provides that:

- The county is committed to meeting current needs without compromising the ability of future generations to meet their own needs.
- The long term impacts of choices will be considered by the county to ensure a sustainable legacy and the county will be guided in its decision making by a mandate to maximize environmental benefits and reduce or eliminate negative environmental impacts.
- The county is committed to promoting a sustainable future by accepting its responsibility to:
 - Support a stable, diverse and equitable economy
 - Protect the quality of the air, water, land and natural resources
 - Conserve, where possible, and enhance ecosystems
 - Reduce the production and disposal of materials which degrade the environment
 - Promote energy efficiency and resource conservation
 - Minimize adverse human impacts on local and regional ecosystems
 - Promote quality housing for all of its citizens (consistent with its infrastructure), sensitive to resource and energy efficiency
 - Promote the protection of open space and the development of environmentally beneficial transportation systems and opportunities for non- motorized travel.
- The county adopts the precautionary principle that requires a careful examination of environmental consequences and the selection of the alternative that presents the least potential threat to human health and natural systems.
- When evaluating potential alternatives, the county will utilize full cost accounting including all reasonably foreseeable costs, including raw materials, manufacturing, transportation, use, cleanup, disposal and health costs, even if such costs are not reflected in the initial price.
- The county will lead by example and will wherever and whenever possible operate its services and facilities in a sustainable manner.

- The county will evaluate its current practices and programs with respect to sustainability.
- The County will be a leader in educating others and will encourage individuals, businesses, municipal governments, schools and institutions to consider the potential impacts of their activities in the context of sustainability.
- The county recognizes that the health of the environment and the economy are interdependent. In achieving a healthy environment, the county will be sensitive to not placing inequitable burdens on any one geographic or socioeconomic sector of the population.
- The county recognizes that community participation is essential and will facilitate stakeholder and citizen participation in the development of a long term program for sustainability.
- The county will undertake to explore and develop incentive programs to support environmentally beneficial practices by businesses and individuals.
- Criteria for measuring progress on sustainability goals will be established.
- Sustainability goals will be reviewed after set periods of time to review the extent to which they have been attained and to modify them to reflect changes in societal circumstances.

The passage of such a statement of commitment by the county will launch the county into the kind of analysis in its decision making essential to preserving our environment and will commence the process that must be undertaken to plan intelligently for our future.

2. Specific Implementing Actions

With the assistance of others in the environmental community, we have developed some specific ideas for action that can be taken in the near term. These suggestions are intended to assist in identifying several initiatives that can be achieved relatively quickly to advance towards the broader goal while the consensus building effort on a sustainability program is ongoing.

A. Energy initiatives

In a green paper entitled “Towards a European Strategy for Energy Supply” the Commission of the European Communities (EU) concluded that *“in general ... programmes for the support and promotion of new technologies have not succeeded to bring about the application of new standards on energy efficiency in buildings.....Therefore more emphasis should now be placed on concrete measures such as the establishment of a clear legislative framework to reduce growth in demand.”*

It appears that the same conclusion can be reached here. While conservation education and incentive programs are absolutely essential ingredients in the drive to lowering energy consumption, legislation can do much to advance that goal. Two thirds of the energy consumed in this country is consumed in its buildings. The EU Commission concluded that the largest potential for energy saving was in residential and commercial

buildings. The United States Department Energy in its recent Strategic Plan similarly made the reduction of energy usage in buildings one of its highest priorities. Local legislation to foster change and using the county as a model and a leader are steps that can be taken here to reduce energy consumption and shift purchasing over to green energy sources.

a. Requiring Energy Audit Certificates

We propose that legislation be enacted which requires (a) that owners of existing commercial and industrial buildings of over 5,000 square feet and of multi-family residences of over 4 units certify every 5 years that an energy audit has been performed which identifies where energy efficiencies can be introduced, provides a cost and benefit analysis and provides reference values and that such audits be provided to tenants prior to any lease renewal and to purchasers prior to any sale, (b) that with respect to newly constructed buildings, an energy performance certificate be made available by the builder to the owner or by the owner to the prospective purchaser or tenant which includes an assessment of energy performance with reference values. The EU has already implemented a similar plan with Directive 2002/91/EC in December of 2002. The legislature can elicit testimony to flush out the precise contours of this proposal including the size of the buildings to be included, the requisite qualifications for the provider of the certificate, enforcement mechanisms, the timing of the requirement for a first audit, any exemptions from the certification for LEED buildings or the like, the reference values to be used, etc.

This energy certification requirement could jump start a significant reduction in energy usage in the county as building owners learn about the savings they can achieve and tenants learn what building owners could do to reduce utility costs. The first step in reducing energy consumption in a building is finding out what efficiencies can be introduced into the facility. Once building owners who pay for the utility charges learn about the savings available to them, many should be motivated to implement the recommendations. As for those building owners who rent out the space and do not pay the utility charges, as is the case in many commercial office buildings, this legislation should create an environment in which tenants start demanding these improvements and the economic equation can be influenced so that improvements are effected.

The cost of the audit and certificate, while certainly a factor to consider, should not be extraordinary and savings in electricity usage should help building owners recoup their costs. NYSERDA is currently running a program to support energy audits for industrial and commercial facilities, State and local governments, not-for-profit and private institutions, agribusinesses, colleges and universities, and K-12 schools which have less than \$100,000 in annual electric bills. The program enables such facilities to engage an energy audit for \$200-600 on a sliding scale depending on annual energy bills. See, <http://www.nyserdera.org/energyaudit.html>

b. Requiring homeowners to disclose utility costs upon sale

Parallel to the certification requirement for buildings, it is proposed that legislation be enacted requiring homeowners to disclose their utility costs for the prior year before the sale of their house. As that information becomes part of the purchase analysis, the energy efficiency of homes may start to influence house prices. If people begin to believe that they will be able to recoup investments in energy efficiency not only through savings in their utility bills, but also in the sale price of their home, many should be more willing to invest in more expensive measures with a longer payback period.

There is currently in place state legislation requiring certain disclosures upon the sale of a home in a form entitled “Property Condition Disclosure Statement”. NYS McKinney’s Real Property Law Sec. 462. The law permits the homeowner to pay \$500 in lieu of making the requisite disclosures. Research by the Law Department is required to determine whether this state legislation preempts the county in this arena and an analysis would have to be conducted as to why the \$500 buyout exists as it would be infinitely preferable to make the disclosure an absolute requirement. Assuming these issues can be satisfactorily resolved, over time this legislation could have a significant influence on homeowner behavior and promote measurable energy efficiency investments in homes.

c. Joining as an Energy Smart Community

We urge Westchester to become a Mid- Hudson Energy Smart Community. Energy Smart is a program developed and supported by NYSERDA. Participation as an Energy Smart Community would entitle the county to receive one on one attention from Pat Courtney, the regional coordinator for NYSERDA, and would enable Ms. Courtney, a very capable and knowledgeable individual, to spend considerably more time addressing Westchester’s needs. Her role would include facilitating technical and financial support from NYSERDA, providing marketing materials, preparing articles and other publicity materials, and providing leverage for additional assistance.

d. New County facilities over a certain size to be LEED certified

In order to set an example for the community, the county should resolve that it will design any significant new county facility to qualify for LEED certification. LEED stands for Leadership in Energy and Environmental Design, a consensus-based national design standard for developing highly efficient and sustainable buildings. LEED establishes criteria for qualification for three levels of LEED certification. LEED certified buildings are becoming increasingly popular as their environmental benefits and long term cost savings are recognized. In Westchester, Sarah Lawrence College is building its new arts center to meet LEED standards.

The majority of LEED buildings are government buildings. Corporations represent 35 percent of those using LEED standards, but local government accounts for 26 percent, state government for 12 percent and federal government for 10 percent. New

York City has already built several LEED buildings and is building several more. The LEED certified buildings built by New York City are expected to attain an average energy cost saving of 20% above those mandated by the current NYS Energy Conservation Code. The federal government has committed to build green to LEED standards in significant new facilities. See, <http://www.epa.gov/opptintr/epp/pilot/13101%20goals.htm> . Westchester should make a similar commitment to build any significant new county buildings to LEED standards.

e. Work with municipalities to reduce costs of green energy

We urge the county to continue its exploration of ways to purchase a segment of its electricity needs from green power. As the county moves towards that goal, synergistic purchasing with the municipalities in Westchester should be examined so that the cost of such purchases can be reduced for all. We understand that NYPA is currently considering arranging to draw more of its power from renewable sources. Please urge NYPA to pursue that goal and express your keen interest in that result.

f. Development of a Westchester conservation emergency plan

Westchester should develop a contingency emergency plan for peak demand which exceeds the capacity of the system. Having procedures in place and educating businesses and the general public of those procedures will enable the county to rapidly deploy steps to avert or ameliorate an energy crisis.

B. Water Conservation initiatives

As the drought of 2002 quickly recedes from the memory of the consuming public and ceases to influence consumption patterns, it is the responsibility of government to take action to continue to promote water conservation and reduce the impact of any future droughts. It is precisely during periods when no crisis is at hand that the kind of planning that needs to be done to effect change can be done in a reasoned and thoughtful fashion. Let's not wait for the next water crisis. Let's act now.

a. Rain Sensors Required on Sprinkler Systems

We recommend that legislation be enacted to require that all owners of automatic lawn sprinklers be required to equip them with an automatic rain sensor device or switch that will override the irrigation cycle of the automatic lawn sprinkler system when adequate rainfall has occurred. Similar legislation has been passed by many local governments including New Jersey, Connecticut, Florida and Great Neck. See e.g. New Jersey Statutes Ann. 52:27D-123.13; Florida Statutes Annotated Sec.373.62; http://www.waterauthorityofgreatnecknorth.com/water_conservation.html Rain sensors can easily and cheaply be added to new or existing sprinkler systems.

b. Water Conservation Resolution and Modeling Xeriscape Landscaping

A resolution on water conservation should be enacted now to promote water conservation education and encourage water conservation measures by the general public and local governments. The setting of rate structures that encourage conservation should also be encouraged. Other programs for saving water such as showerhead trade in programs should be explored.

We recommend that the water conservation resolution include provisions to establish the county as a leader in the application of Xeriscape landscaping techniques and provide that the county will use xeriscape techniques wherever feasible on county owned property as sites are being relandscaped. The only xeriscape garden in Westchester County was opened in 2002 by the Westchester Joint Water Works on Mamaroneck Avenue.

The general population and even most landscapers have no familiarity with xeriscape and think of it as being limited to cacti and rock gardens. Actually seeing what a xeriscape garden looks like should lead many to use the techniques in their own back yards. Xeriscape is the word for any permanent landscape that is able to withstand little water. Such a garden can be adapted to suit the individual conditions of the region. In Westchester a pleasant mix of perennials, flowering bushes and trees, lawn grasses and concentrated annuals can be arranged to create a pleasing landscape that does not require the level of water now typically used. Xeriscape is based not only on plant selection but also on other elements which the public needs to see. These elements include designing the garden to group plants with like water needs together, increased use of certain irrigation techniques including drip irrigation, more mulching, reducing grassy areas and using less thirsty varieties of grass.

With the county as a leader modeling such gardens, a much broader audience will be able to see them and the eye of many Westchester residents will become accustomed to all aspects of the look of low water gardens. As Westchester residents integrate the new look into their gardens, water usage in the yards throughout Westchester should be reduced.

C. Solid Waste reduction

a. Consumer electronics

One of the emerging areas of concern is the proliferation of consumer electronics and the solid waste issues generated by the disposal of those products as they become obsolete. The EPA reports that in the last 20 years the number of units of consumer electronics generated more than tripled reaching 510 million units in 2001. Virtually every home today has multiple televisions and computers. Computers are replaced on the average every 3-6 years. There are currently over 120 million cell phone subscribers in the United States and on average those subscribers use their phones for only 18 months

before replacing them. It is estimated that by 2005 there will be over 130 million cell phones retired annually. These consumer electronics contain many chemicals which are recognized as being injurious to health including lead (which is found in significant quantities in televisions and computer monitors) , cadmium, mercury, hexavalent chromium and brominated retardant materials. The disposal of these massive quantities of harmful chemicals in the environment is an issue that demands immediate attention.

As we wait for more long term and permanent solutions that shift to the manufacturers the responsibility for eliminating or recapturing these hazardous products from the waste stream, we need to work out methods for collecting discarded electronics and keeping them out of the municipal waste stream here in Westchester. The county recently added televisions and computer monitors to the materials that can be collected on chemical clean up days. That program should be expanded this year to include cell phones. Inform Inc., a not-for-profit which has existing relationships with corporations and not- for profits who reuse and recycle the phones, has offered to take all cell phone collected free of charge for reuse and recycling.

It is our understanding that the county currently not only collects these products on chemical cleanup days but has also arranged to pick up televisions and computer monitors from local municipal recycling centers on a monthly basis and that many if not all of the municipal recycling centers will take these products. Thus, as is the case in most of the electronics recycling programs around the country, collection is available not only on clean up days but is ongoing. Public education as to the availability of this service is essential. It is considerably more difficult for people to remember when the special cleanup days are and to get to the four designated locations than to get to their local recycling center. It is our impression that people are simply not aware of this local service.

We urge the county to add cell phones to the products that will be collected for recycling, work to assure that all with the municipal recycling centers accept televisions, computer monitors and cell phones and cooperate with the municipalities on a public campaign to educate people as to the hazardous chemicals in these products and the importance of recycling them and ensure that people in each municipality know about and take advantage of the recycling service.

b. Office Supplies and operations

Finding that both price and quality were comparable, the county has been a leader in switching to recycled paper for its office use. We urge that the county commence an examination of whether other product and/or practice changes could further reduce waste and still be cost effective. For example, substituting reliable recycled toner cartridges will not only reduce solid waste but will also save 40-60 % of the cost of toner. Inform Inc., a not-for-profit that focuses on waste reduction and environmentally preferable purchasing, is eager to work with the county to examine these alternatives. Inform Inc. currently advises many local governments on such issues, including Erie County, Montclair N.J., and the states of New York, New Jersey, Connecticut, Vermont

and many others. Businesses as well as individuals should be informed of the steps taken by the county to reduce waste.

c. Plastic Grocery Bag Levy

In 2001 the United States generated eleven million tons of plastics in the municipal solid waste (MSW) stream. Plastic is a rapidly growing source of tonnage in the MSW stream and has increased to 11 per cent of the tonnage in 2001 from only 1 percent of the tonnage in 1960. See, <http://www.epa.gov/epaoswer/non-hw/muncpl/plastic.htm>. Overall plastics recovery was only 5.5 percent of plastic generation in 2001 and most of that was from soft drink bottles. <http://www.epa.gov/epaoswer/non-hw/muncpl/msw99.htm> Plastic bags are a significant segment of that tonnage; use is high and virtually no one takes plastic bags for recycling. The average American uses one thousand plastic bags per year. Plastic bags and wrap make up 45% of plastic waste. Most of that is generated in grocery stores. <http://www.tetonwyo.org/recycling/nav/200123.shtm> (Note: We have not been able to verify this data on plastic bags from a reliable source).

In Europe something has been done about this problem. In 2002 Ireland imposed a plastic bag levy on bags distributed at supermarkets. The levy cut the use of plastic bags in supermarkets by over 90% in just 6 months and the measure generated about 3.5 million euros in tax dollars. In other European countries supermarkets have been charging for the plastic bags for a long time and most people have no need for them as they bring bags with them when they shop. A measure such as that in Ireland should be given strong consideration here after an analysis of our own MSW stream. Legislation will move behavior more quickly than voluntary action. Causing people to bring bags with them when they go shopping is a small thing to ask and may serve not only to reduce the plastics in the MSW stream but may also serve as a daily reminder to people of the need to be sensitive to the environmental impacts of their conduct.

D. Environmentally Preferable Purchasing

While the general sustainability resolution discussed above would cover environmentally preferable purchasing by the county, the adoption of a separate resolution setting forth the county's commitment to environmentally preferable purchasing would serve to highlight the importance of such actions to others and encourage others to follow suit.

Many governmental entities have already adopted such a policy and have begun to implement it. Pursuant to Executive Order 13101 issued in 1998 by President Clinton, the EPA has issued guidelines for federal strategies to implement environmentally preferable purchasing with respect to green buildings, janitorial and maintenance services, paper products and office supplies, green meetings, green electronics, green fleets, green landscaping, green power and recycling and waste prevention. See,

<http://www.epa.gov/opptintr/epp/pilot/index.htm> The city of Santa Monica embarked upon such a program in 1993 and has a wealth of experience in its implementation. See <http://www.ci.santa-monica.ca.us/environment/> Massachusetts, Washington and Minnesota and others have similar policies in place. Westchester should do the same.

One area in which immediate improvements can be achieved is in the purchase of products for janitorial services. Many of the cleaning solutions typically used are toxic and contribute significantly to the emission of volatile organic compounds (VOC's). Effective products at an equal cost are available on the market. The Department of Interior has already switched over to nontoxic alternatives. See <http://www.epa.gov/opptintr/epp/ppg/case/doicase.htm> The EPA has directed that all federal government janitorial contracts should specify products that meet the Green Seal Cleaning Products Standard. <http://www.epa.gov/opptintr/epp/pilot/13101%20goals.htm> In Westchester, the Briarcliff School District and the White Plains school districts, concerned about asthma and other student health issues, have switched to non-toxic janitorial products. Again, Inform Inc., which has a wealth of experience in janitorial products as part of its environmentally preferable purchasing program, would be happy to work with the county and advise it on alternatives.

E. Water Quality Measure

The inflow of stormwater into the sewer system, which is not permitted and lacks capacity for such water, is a major problem in this county and has caused overflows from sanitary sewers into rivers and streams that feed into Long Island Sound and the Hudson River with consequent beach closings and environmental damage. On occasion these inflows have created such a large inflow of water that they have caused sewer treatment centers to malfunction and release partially treated sewage into the Sound and the Hudson. Working with the municipalities, the county has made significant progress with major repairs to address the problem of inflow and infiltration into the sewer system.

A continuing problem, however, is the private inflow of stormwater from people's homes into the sewer system due to illegal hookups. While such hookups are against the law, there are many such hookups which place a burden on the sewer system that it cannot bear. It is urged that the possibility of having homeowners certify upon sale of a house that there is no illegal hookup directing stormwater into the sanitary sewer lines be pursued as a way to address this problem. The certification requirement could be an effective way to cause many to correct the problem before the sale of their home.

Some of the illegal hookups are simple to identify and are caused by the connection of a sump pump in the basement to the sanitary sewer line. Some illegal hookups are harder to detect as they are caused by the underground connection of down spouts or catch basins outside the house into the lateral pipe connecting to the sewer line and can only be detected by smoke testing the sewer line with municipal cooperation. The 10 municipalities in the New Rochelle, Mamaroneck, and Blind Brook Sewer Districts, where private inflow is a significant problem, are embarking upon a program to

accomplish this smoke testing to identify illegal hookups. It is suggested that the requirement for homeowners can be structured to phase in only following the smoke testing of the sewer lines by the local municipality and the identification by the municipality of those illegal hookups.

If this suggestion is pursued, formal input should be requested from not only the law department to confirm the county's authority to enact such a provision but also the Department of Environmental Facilities and the Department of Public Works, both of which have extensive expertise with these issues.

F. Air Quality Measure

There is major multi-unit residential and commercial construction ongoing in the county. These large construction sites are a significant source of air pollution. In New York City non-road vehicles, like backhoes, bull dozers, and cranes and other diesel construction machinery, put out more fine particulate pollution than cars, trucks and buses combined. The same is undoubtedly true here. Westchester is in a non-attainment zone by EPA standards under the Clean Air Act because of the level of air pollutants. Asthma is of epidemic proportions and growing among our youth.

Improving air quality is difficult. Where a solution is available, as it is for construction vehicle pollution, it should be implemented. Legislation should be enacted requiring that on large jobs construction machinery of over 50 horsepower must use ultra low sulfur diesel fuel and be retrofitted to control particulate emissions with the best technology then available for emission reduction. These measures can cut emissions from construction machinery by up to 90%.

These techniques have been tested and proven. The county is familiar with low sulfur diesel since it is used in the bus fleet. The techniques recommended have been utilized in Boston on the Big Dig, in new construction by Mr. Silverstein at the World Trade Center and have been enacted as a requirement under New York City local law with respect to all non-road vehicles used by or for the benefit of New York City at Ground Zero. The expansion of the requirement to other areas will be considered by New York City at the end of the year.

In testimony before the Committee on Environmental Protection of the New York City Council, Mr. Silverstein's representative reported on the field experience with these methodologies and stated that the cost of the ultra low sulfur diesel fuel was roughly equivalent to that of regular diesel fuel and that the retrofits cost about \$2,000 per installation. In the context of the cost of a major construction project in Westchester these costs are simply insignificant and are by far outweighed by the benefits of the legislation.

Suggestions for action steps have been solicited and received from many environmentalists and environmental groups in the preparation of this letter including Federated Conservationists of Westchester County Inc., Natural Resources Defense Council and Inform Inc. We have compiled considerable materials and expertise with respect to these matters and would like to share those with you.

We would appreciate an opportunity to meet with you to review these recommendations.

Respectfully submitted,

Edna R. Sussman
President