



COUNTY OF ROCKLAND
DEPARTMENT OF PLANNING

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County Executive

SALVATORE CORALLO
Commissioner

ARLENE R. MILLER
Deputy Commissioner

May 19, 2010

Michael Klein, Town Attorney
Town of Ramapo
237 Route 59
Suffern, New York 10901

Re: Project Grand Slam Baseball Field

Dear Mr. Klein:

We are in receipt of the Draft Environmental Impact Statement (DEIS) for the above referenced project. As an ongoing interested party for the New York State Environmental Quality Review Act (SEQRA) process, our department has reviewed the DEIS for the proposed Project Grand Slam Baseball Field. This project is also subject to our review under Section 239-n 3.(a)(i), (ii), (iv), and (v), and Section 239-n 3.(a)(i), (ii), (iii), and (iv) of the New York State General Municipal Law (GML). The proposed baseball field has frontage on two county roads (Pomona Road and Firemens' Memorial Drive) and is immediately adjacent to a county park (Samuel G. Fisher Mount Ivy Environmental Park) and a county facility (Fire Training Center). The site is also within 500 feet of the Palisades Interstate Parkway, Route 45 and the Village of New Hempstead. New York State and Federal wetlands are located on the property. The United States Army Corps of Engineers, the United States Environmental Protection Agency, New York State Department of Environmental Conservation, New York State Department of Transportation, Rockland County Sewer District No. 1, Rockland County Health Department and the Rockland County Highway Department are involved agencies, and should be so identified, because permits may be required from these departments. The site falls within the jurisdiction of this department under the New York State General Municipal Law. However, a permit is not required from this department. We should be listed as an Interested Agency. The Rockland County Division of Environmental Resources, Office of Fire and Emergency Services and Drainage Agency should also be listed as Interested Agencies, as should the Palisades Interstate Park Commission and the Village of New Hempstead.

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TOWN ATTORNEY
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Several Involved Agencies with permitting authority have submitted comments on the DEIS. In a letter dated May 7, 2010, the Rockland County Highway Department raised concerns about specific deficiencies of the April 21, 2010 set of drawings for this proposal, as well as the traffic impact study. We concur with their findings. The Town must satisfactorily address these issues. The Rockland County Office of Fire and Emergency Services is concerned about how traffic generated by the proposed stadium will impact the operation of their facility especially in the event of an emergency. KLD Engineering, P.C., a consultant for the Office of Fire and Emergency Services, also reviewed the traffic impact study and proposed parking for the stadium. They raise a number of issues regarding the impact of this proposal on access to, egress from and use of the Fire Training Center in emergency situations in their May 17, 2010 letter. KLD, Engineering, P.C., questions many of the traffic impact study assumptions on which the mitigation recommendations are based. The Town's traffic consultant must satisfactorily address the issues raised by KLD, Engineering, P.C.:

The Rockland County Office of Fire and Emergency Services has submitted comments on the DEIS related to parking and traffic, helicopter flights, disruptions during construction, natural gas main adjacent to the property, operational concerns and emergency response to the proposed stadium. The Town must work with the Office of Fire and Emergency Services to ensure that their concerns are satisfactorily addressed and that their emergency operations are not negatively impacted during the construction and operation of the stadium.

As noted above, the subject site is immediately adjacent to Samuel G. Fisher Mount Ivy Environmental Park, a county park. The Rockland County Division of Environmental Resources provided comments on the DEIS in a letter dated May 11, 2010. They encouraged the Town to consider constructing a LEED-certified stadium and recommended many green initiatives to protect the sensitive environmental features found on the site and the adjacent parkland. They raised concerns regarding the protection of sensitive resources including wetlands and the perennial stream, as well as on-site drainage, lighting and noise pollution. In their letter, the Division of Environmental Resources questioned some of the information provided in the Hydrology Report and on the Grading, Drainage and Utility Plan. These points must be clarified. The additional information requested in their letter regarding the detention facilities must be provided. The Town shall consider the recommendations outlined in the May 11, 2010 letter to ensure that the proposed stadium does not negatively impact the adjacent county parklands.

The Rockland County Sewer District No. 1 issued comments on the DEIS in a letter dated April 21, 2010 and another letter addressing the April 21, 2010 Layout Plan and related drawings on April 27, 2010. The Town must satisfactorily address the issues raised and comply with the conditions outlined in these letters.

In a letter dated April 27, 2010, the Rockland County Health Department indicated the approvals required from that department for the sanitary sewer system and the water main extension, as well as the information to be provided regarding the sanitary sewer system. The Town shall not grant final approvals for the proposed stadium until the Health Department has approved these items.

The Ramapo Town Board submitted a GML review request to this department for this proposal on April 22, 2010. We will issue GML comments regarding the impact of this project on our areas of concern prior to the May 26 public hearing. The specific GML criteria are noted above.

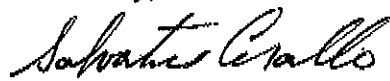
We offer the following comments on the DEIS.

- On page 7, it is stated that there is approximately 500 feet of vegetation between the proposed stadium and the closest residences in the Village of New Hempstead. The last sentence on page 13 reads, "No residential property line exists within a 400 foot distance from any boundary of this site." The rear property lines of the single-family lots on Lori Court are 370 feet south of the site. This discrepancy must be corrected.
- The map on page 16 should indicate the zoning classifications in the adjacent Village of New Hempstead.
- The proposed access road to the site from Firemens' Memorial Drive will cross an area of steep slopes of over 35 percent. Will these slopes have to be disturbed to accommodate the access road? An alternate access should be explored within the DEIS to mitigate the environmental impacts of the extensive grading that would be needed to provide this access.
- On page 19, it is indicated that the grading of the site will require walls to permit the design to meet the maximum slopes restrictions for parking areas and access roads. These walls should be tiered and not more than four feet high. They should be enhanced with landscaping to minimize their visual impact.
- Infrastructure is discussed in Section 8. The water section should indicate how the usage of 25,000 gallons per day during game events was determined. The anticipated number of spectators must be specified. The seating capacity figures quoted in this document range from 3500 to 5000. This potential 1500 person difference has implications for water usage, sewer capacity and solid waste generation. Under solid waste, 5000 potential patrons are specified. The Town must clarify the maximum number of patrons to be accommodated at this facility so that calculations for infrastructure can be figured correctly.
- The DEIS has recommended signalization and roadway configuration improvements to mitigate any negative impacts caused by traffic generated by the stadium. These improvements will require approval by state and county agencies. As noted above, the Rockland County Highway Department and KLD Engineering, P.C. have questioned the validity of some of the assumptions in the traffic impact study. The DEIS must address the possibility that some proposed improvements may not be approved.
- Night-time views of the facility are discussed on page 61. The lights of this facility will be evident from the Palisade Parklands to the northwest. It is stated that the impacts will not be significant because no one hikes the scenic vistas during these hours. Although it is unlikely that hikers will be using the trails at night, overnight camping is allowed in Harriman State Park so the ballfield lighting will be visible to campers and may have a negative visual impact. This visual impact must be noted in the DEIS.
- Fiscal Resources and Community Services are discussed in Section 14. Given the concerns raised by both the Rockland County Highway Department and KLD Engineering, P.C., we believe that additional police support personnel may be required to manage the flow of traffic to and from the facility

- Given that there is no local economy in immediate proximity to the proposed stadium, we question whether there will be any ripple effects as a result of this development. The nearest commercial district is on the Route 202 corridor, more than a mile north of the site.
- Previous submissions regarding this proposal referenced 80 days of game events. The DEIS specifies 50 games. The total number of games to be played per season must be clarified, as well as other events that will occur at this facility.
- In Section 15, two alternatives are considered – a no action alternative and the Ball Field alternative. This section should also include an alternate site location for the proposed facility.

Thank you for the opportunity to comment on the DEIS for this proposal. If you require additional information, please contact the Rockland County Department of Planning at (845) 364-3434.

Sincerely,



Salvatore Corallo
Commissioner

C: Supervisor Christopher St. Lawrence
New York State Department of Transportation
New York State Department of Environmental Conservation
United States Army Corps of Engineers
United States Environmental Protection Agency
Palisades Interstate Park Commission
Rockland County Department of Highways
Rockland County Department of Health
Rockland County Sewer District No. 1
Rockland County Office of Fire and Emergency Services
Rockland County Division of Environmental Resources
Rockland County Drainage Agency
Rockland County Planning Board
Leonard Jackson Associates
Village of New Hempstead