

TOWN OF CLARKSTOWN  
DEPARTMENT OF PLANNING

JOSE C. SIMOES, PRINCIPAL PLANNER  
JAMES CREIGHTON, SENIOR PLANNER  
10 Maple Avenue  
New City, New York 10956-5099  
Tel: (845) 639-2070  
Fax: (845) 639-2071  
planning@clarkstown.org



TOWN OF CLARKSTOWN  
PLANNING BOARD

GILBERT J. HEIM, CHAIRMAN  
RUDOLPH J. YACYSHYN, VICE CHAIRMAN  
PETER E. STREITMAN, MEMBER  
EDWARD J. GUARDARO, JR., MEMBER  
PHILLIP J. DEGAETANO, MEMBER  
DOUGLAS B. KATZ, MEMBER  
EDWARD BERTOLINO, MEMBER

August 14, 2019

Michael B. Specht, Supervisor  
Town of Ramapo  
237 Route 59  
Suffern, NY 10901

'19 AUG 20 AM 10:17

**RE: Pascack Ridge Technical Addendum to the Final Environmental Impact Statement**

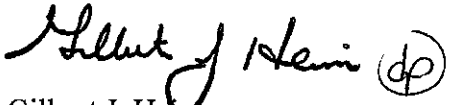
Dear Supervisor Specht:

The Planning Board discussed the above referenced matter at their August 7, 2019 meeting. On a Motion of Katz, Seconded by Streitman and carried 7:0 with Ayes of Heim, Yacyshyn, Guardaro, DeGaetano and Bertolino, the following recommendation was made:

We have reviewed the Technical Addendum to the Pascack Ridge Environmental Impact Statement, dated July 9, 2019. In previous correspondence from the Town of Clarkstown related to this project, the Town expressed concerns over the traffic implications of the connection of this development to Spring Brook Road, a local street. The Technical Addendum supports these concerns, as the included traffic study prepared by Harry Baker & Associates shows a degradation of traffic conditions on Spring Brook Road. We continue to have serious concerns over the impact of this development on the nature of the surrounding single-family residential neighborhood and maintain our view that the proposed rezoning is not in character with the area, nor does it meet the criteria for multi-family zoning set forth in the Ramapo's Comprehensive Plan.

The Planning Board is strongly opposed to the proposed rezoning and project, as we feel it will be detrimental to our residents and the area at large. At the very least, we again urge that this zone change not be considered until the Town of Ramapo's Comprehensive Plan is updated more thoroughly, which has already been commenced with the Northeast Ramapo Strategic Plan. Furthermore, we maintain that any development resulting from the proposed Comprehensive Plan amendment and zone change should also be given a thorough review under the provisions of SEQRA, as specific impacts to the environment, traffic, community resources and others related to increased development potential can only be fully understood and mitigated through a project level review.

Sincerely,

A handwritten signature in black ink that reads "Gilbert J. Henn" followed by a circled "dp" in the bottom right corner.

Gilbert J. Henn  
Chairman

GJH:dp

CC: Supervisor Hoehmann & the Town Board  
Rockland County Department of Planning

**Maureen Pehush**

---

**From:** Diane Papenmeyer <d.papenmeyer@clarkstown.org>  
**Sent:** Wednesday, August 14, 2019 5:14 PM  
**To:** Maureen Pehush; Susan Resnick  
**Subject:** Pascack Ridge Addendum FEIS  
**Attachments:** DOC081419-001.pdf

See attached letter from the Town of Clarkstown Planning Board and please make sure that Ramapo Supervisor Specht, Town Clerk and Town Planner receives a copy of it immediately. This letter was mailed to Supervisor Specht today, an email was sent to the Town Clerk at [sampsonc@ramapo.org](mailto:sampsonc@ramapo.org) today, however a return email indicated that he was not available until next week. Please confirm receipt of email. I appreciate your assistance in this matter.

Thank you so much,  
Diane

--  
Diane K. Papenmeyer  
Town of Clarkstown  
Planning Department  
10 Maple Avenue  
New City, NY 10956  
Phone: 845-639-2069  
Fax: 845-639-2071

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August 14, 2019

Michael B. Specht, Supervisor  
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237 Route 59  
Suffern, NY 10901

**RE: Pascack Ridge Technical Addendum to the Final Environmental Impact Statement**

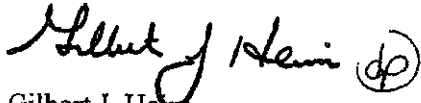
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The Planning Board is strongly opposed to the proposed rezoning and project, as we feel it will be detrimental to our residents and the area at large. At the very least, we again urge that this zone change not be considered until the Town of Ramapo's Comprehensive Plan is updated more thoroughly, which has already been commenced with the Northeast Ramapo Strategic Plan. Furthermore, we maintain that any development resulting from the proposed Comprehensive Plan amendment and zone change should also be given a thorough review under the provisions of SEQRA, as specific impacts to the environment, traffic, community resources and others related to increased development potential can only be fully understood and mitigated through a project level review.

Sincerely,

A handwritten signature in black ink that reads "Gilbert J. Helm" followed by a circled monogram "GH".

Gilbert J. Helm  
Chairman

GJH:dp

CC: Supervisor Hoehmann & the Town Board  
Rockland County Department of Planning

**From: Bruce M. Levine**  
9 Robin Hood Road  
Montebello, NY 10901

TOWN OF RAMAPO  
TOWN CLERK'S OFFICE

**To: The Town Board of the Town of Ramapo**

2019 AUG 15 A 10:01

**Date: August 15, 2019**

**RE: Testimony on the proposal for a master plan and zone change in the Pascack Ridge Development**

I will be unavailable during the public hearing on the Pascack Ridge hearing. The following should be considered my comments on this proposal for each issue to be potentially voted on by the Town of Ramapo Town Board. Please attach this document to the record of each proceeding.

For the Pascack Ridge proposal itself, please note that its argument for a change in the master plan is that the Town population is growing and there is a need for more housing to accommodate this need. However, the Town should note that there are currently one or two unfinished housing developments on Rte 59 between Remsen Avenue and Main Street Monsey and that these developments have not been built for many months and I believe many years. Similarly, there is the 50 year sold and over development approved for Highview Road. I believe there is yet another uncompleted development on Rte 17. This disproves this great need for additional housing in the Town unincorporated area.

Before the Town of Ramapo Town Board considers this proposal and specifically before any amendment to the Town of Ramapo Master Plan is voted upon for any proposed change in the Master Plan, the Town must conduct a thorough study of Housing Segregation in all of the Town's zoning areas and also in the Villages within the town.

All of the following measures should be required after a study of existing conditions town-wide including in Villages within the town and prior to any change in the master plan:

The town should impose mandating bedroom mixes in all proposed developments 1, 2, 3, 4 and 5, bedroom rental/condo or other forms of units or houses. The town needs to ascertain how many such units have been added in the last 20 years of each type.

The town must prohibit pre-selling of any units in the town of Ramapo and the town must be given a list of any units that will go for sale or rental so it shall immediately post them on the website and no sale or rental shall take place before the site has listed these after they have been posted for ten days. This also will require a study.

The Town must also study the need for affordable housing in the town – again what has happened in the last 20 years and what is the need. Note there were only a few affordable units

**put in Ramapo Commons despite promises that they all would be. There was also a promise at the time that the Town would build affordable housing specifically in Northeast Ramapo. The town needs to look at lands it has sold off and see if any of these have led to affordable housing. Affordable housing is housing bought or rented at below market rates and with a limit on resale or on price increases for at least 20 years and subsidized by the state to ensure that these units are auctioned off after a process that is open to all who qualify. Affordable Housing should be required in every multiple dwelling (over three units – including conversions or new buildings in R15-C).**

**No town sale of property that could be used for housing can be transferred without deed restrictions to the benefit of an affordable housing advocate or its successors and requiring the bedroom mix and other rules described above.**

**The town must study basement and attic conversions in single or multiple dwelling houses and must require inspections (not for criminal prosecution except if egregious safety violations are found).**

**No change to the master plan of any kind should be adopted without such a study.**

---

**Bruce M. Levine**

## Maureen Pehush

---

**From:** Bill Weber <williamweber69@gmail.com>  
**Sent:** Thursday, August 15, 2019 5:27 PM  
**To:** Maureen Pehush  
**Subject:** Fwd: Pascack Ridge Project

Bill Weber  
914-906-7540 cell

Begin forwarded message:

**From:** Bill Weber <williamweber69@gmail.com>  
**Date:** August 15, 2019 at 5:13:30 PM EDT  
**To:** Michael Specht <spechtm@ramapo-ny.gov>, Mona Montal <montalm@ramapo-ny.gov>, SampsonC@ramapo-ny.gov  
**Subject:** Pascack Ridge Project

For Immediate Release  
Date: August 15, 2019

To Supervisor Specht and the Ramapo Town Board:

I, like many residents of Ramapo, are currently on vacation and unable to attend this very important meeting in person tonight. Therefore, I will submit my comments in writing for the public record.

I am in opposition to the amendment of Town of Ramapo Comprehensive Plan, including the Housing and Future Land Use sections, with respect to the consideration and location of multifamily housing in the Town.

Two years ago, Supervisor Specht and your running mates (Wanounou and Ullman) released your campaign platform (photos enclosed) that you pledged to implement if elected. The other remaining members of the board (Logan and Rossman) also endorsed your plan.

The plan, among other things, called for a moratorium and an update of the Town's Comprehensive plan. What did we get instead in the two years since? A temporary moratorium of three months to catch up on the backlog in the planning and zoning process and then a continuation of business as usual.

Continued spot zoning on smaller projects is bad enough. But to amend the town's comprehensive plan to allow a development of this enormity is unconscionable.

You need to follow through on your campaign promise:

Pass a real moratorium.

Update the towns comprehensive plan that has input from all the communities in Ramapo.

Do the proper planning for roads, infrastructure, water, and sewer.



Do the proper planning to prepare for what Ramapo will be in the next 20 to 30 years, and not just platitudes that get you through the next election cycle.

Lastly, I think due to the bad summer timing of this meeting, you need to keep the public hearing OPEN until another date in September to give any residents who are away on vacation an opportunity to voice their concerns.

Respectfully,

William J Weber

- **Bureau of Planning & Zoning**, to be headed by a professional planner or civil engineer, to review all subdivision and site plan applications for subdivisions, site plan approvals and appeals to the Zoning Board, to be informed of all relevant factors and potential impacts of each application.
- **Office of the Building Inspector**, headed by the Building Inspector, to review all construction and to issue certificates of occupancy to complying projects
- **Bureau of Fire Safety and Enforcement**, headed by the Chief Fire Inspector, to conduct fire safety inspections, school safety inspections, and to take enforcement action against any persons who violate fire safety, zoning and property maintenance laws.

In the past, one employee held responsibility for all of these functions. By dividing these functions into three divisions, we will create a system of checks and balances, ensure accountability, and reduce the risk of error.

### 3. Improving Traffic and Pedestrian Safety

Ensuring the safety of people driving or walking through our neighborhoods is a top priority for the Town. As the population of our residents, the streets have become too congested and too dangerous. We will conduct a pedestrian study with public participation and community input, for the purpose of identifying areas for improvement and implementing solutions.

- Smart Crosswalks
- Additional police presence
- Crossing guards
- One way streets
- "Smart" signals, improved signage, and better lights
- Increased enforcement of our Town's regulations



## **Support for the Public Schools**

We continue to support the excellence and strength of the Suffern Central School almost 25 years. His wife Karen grew up in Tallman and is a graduate of Suffern of the Suffern public schools. He and his family have a vested interest in maintaining the independence and excellent reputation of the district.

The Town has no control over the zoning and land use of almost all of the land segments within unincorporated Ramapo, such as the Suffern Park neighborhood status. Any increase in population within the Suffern School District has occurred in Sloatsburg, Montebello, Hillburn and Airmont, which enact and enforce their own planning boards.

Under our administration, the Town will encourage and attempt to facilitate the adjoining quarry property by responsible private entities for use as ratable commercial order to increase the tax base for the school district. Likewise, we will reach out to long vacant and unsightly Grand Union on Route 59 and Airmont Road in the Valley to be used for taxing commercial use.

The Town will promote partnering with local not for profit groups to provide services for students within the Suffern and East Ramapo School Districts. We will make our Valley available to benefit students by hosting after school activities, tutoring and other programs. We will encourage the Ramapo district and its parents associations to seek solutions for the challenges that should be limited by his or her zip code.

We will ensure that our parks and programs remain available to all of our residents, offering discounted membership rates, for example, so that children from every neighborhood



This starts with our town leadership. We are committed to fighting for One Good

We will be proactive in giving our residents a Responsible Government that is

We will resist anyone who seeks to divide us or target any member of our commu-

Ramapo does not need leaders who embrace divisiveness at the county, state or  
immigrants, that stands with leaders who claim that there were two sides to WTC  
right here in our back yard.

### **Open Access to our Parks and Recreational Programs**

The Spook Rock Golf Course is a crown jewel in the Town's parks and recreat  
legally sell or transfer the property without approval of the NYS legislature. A  
property is either based in ignorance or an effort to spread misinformation for p

More importantly, the golf course will permanently remain a public golf course  
golf course loses approximately \$800,000.00 each year. We are going to take f  
the Town should continue to learn from and explore the route taken by other m  
soliciting proposals by private companies to operate the golf course upon paym  
eliminated a large annual operating deficit. The Town will not enter into such a  
favorable to the Town and preserve golf course access and discounted, affordal  
the golf course have deteriorated, and a proper agreement shall provide for upg  
will only enter into an agreement if the financial benefits to the taxpayers are e  
golfing public.

In doing so, we guarantee that the Spook Rock Golf Course remains a public



The Town will continue to improve its financial situation by reviewing the Town budget to ensure that we are not compromising essential services for the public or the quality of life of our residents.

### **A RAMAPO FOR THE FUTURE**

The Town of Ramapo remains a safe and desirable home for more than 130,000 residents. Our property tax increase, demonstrating the desirability of the Town as a place to live. We are proud of our schools, our police and fire departments, and our police department will continue to protect the public, improve our infrastructure, and maintain our quality of life.

Over half of the Town consists of parkland and open space, and the Town's parks and recreation department will continue to serve our residents.

By addressing the challenges we face in a rational and well thought out way we can ensure a bright future for our town, balancing the needs of our diverse community, and implementing our plan for the future. We invite you to join us and work together to keep our town a Safe, Clean, Open community for all of our residents.





# Breaking Barriers, Building A Future

## **BREAKING BARRIERS, BUILDING A FUTURE**

It is time to turn the page, and focus on creating a Ramapo that is Safer, Cleaner and Open to everyone. The Ramapo For You campaign is the only campaign to offer a slate of candidates with the experience and vision to address the challenges facing our community. This is not a time for hand-outs or platitudes. It is a time for real leadership that understands what needs to be fixed and knows how to get it done.

Our vision for Ramapo preserves and protects what makes this Town great, while addressing the challenges that we face together as one community. The "Breaking Barriers, Building a Future" platform is the most detailed and comprehensive reform agenda ever proposed for Ramapo.

Together, we are going to keep our community Safer, Cleaner and Open to Everyone. This includes our streets, our parks, and our recreational facilities.

## **CRACKING DOWN ON OVERDEVELOPMENT AND MAKING RAMAPO SAFER FOR ALL:**

### **1. Moratorium on New Development and Review of the Town's Comprehensive Plan**

The Town's Comprehensive Land Use Plan is now over 12 years old. It is time to conduct a full review of its provisions, and determine if changing conditions now require that the Town's plan be revised or amended to crack down on overdevelopment, promote responsible and sustainable growth, strengthen our infrastructure, and reduce the negative effects of development, including traffic congestion.

We will immediately undertake a full review of the Town's Comprehensive Land Use Plan and Zoning Law. This process will be open to public participation and we will seek the active input of all our residents in determining how to meet the future needs of the Town. During this time, we will implement a moratorium ("freeze") on certain types of new development.

Moreover, the largest growth in density in the unincorporated Town of Ramapo has been in the R-15C zoning district, which allows for up to three family housing with three accessory apartments, for a total of six residential units, or quarter acre lots, along with the R-15A zoning district, which permits up to two family houses with an accessory apartment. While this met a rapidly growing demand for housing, it also has led to complaints of overdevelopment and accompanying parking and traffic problems. A moratorium will be imposed on any such development on non-complying lots in these zones, while we study how to amend or revise the current R-15C and R-15A zoning laws and requirements.

No development of the Route 59 corridor will be considered without the strengthening of the existing infrastructure and only after the public is given the opportunity to participate.

### **2. Zoning, Planning, Fire Safety, Building and Code Enforcement**

The Department of Building, Planning and Zoning will be restructured to ensure that building permit applications will be properly reviewed; applications for site plans and subdivisions will be carefully evaluated before submission to the Planning Board; and that inspections for safety and code compliance are done on time and effectively. While we will seek compliance as our first goal, we will commence actions for injunctions against violators who pose a safety threat to the public and our first responders. The price of breaking the law must always be higher than the cost of obeying it. It is sad but true that many people believe it is easier to seek forgiveness instead of permission. It will be our responsibility to prove them wrong.

Three separate divisions will be created, each to be headed by a separate professional.



THE SENATE  
STATE OF NEW YORK



DAVID CARLUCCI  
SENATOR, 38TH DISTRICT

**Chairman:**  
Mental Health and Developmental Disabilities

**Committees:**  
Energy and Telecommunications  
Health  
Insurance  
Investigations and Government Operations  
Transportation

**Albany Office:**  
Capitol 514  
Albany, NY 12247  
(518) 455-2991  
Fax (518) 426-6737

**Rockland Office:**  
20 South Main Street  
New City, NY 10956  
(845) 623-3627  
Fax (845) 708-7701

**Westchester Office:**  
2 Church Street, Ste. 210  
Ossining, NY 10562  
(914) 941-2041  
Fax (914) 941-2054

**E-Mail Address:**  
Carlucci@nysenate.gov

August 15, 2019

Michael Specht  
Supervisor, Town of Ramapo  
237 NY-59  
Airmont, NY 10901

Dear Supervisor Specht and Town Board Members,

The Pascack Ridge Development is ill suited for its proposed location. This facility will have over 290 units. This will drastically alter the makeup of its neighborhood.

Overdevelopment in Rockland has been a major issue for years. If this project moves forward, this will be yet another example of egregious building in an area that is not equipped to handle such facilities. The Pascack Ridge development will alter our suburban landscape. This is unsustainable.

There are numerous environmental concerns due to this project. There is forestland that will be cut down and wetlands that will be impeded upon. We must protect our environment. This project endangers it. Additionally, concerns have been raised about the increased traffic congestion that will occur in this area should this project be approved. Increased congestion goes hand in hand with overdevelopment. Our county has seen a drastic increase in this pattern and it harms residents.

The Rockland County Planning Department has raised objections to this project. According to the department, this project raises many environmental concerns. Additionally, the department stated that a facility of this magnitude would be out of character for the neighborhood. The Town of Clarkstown has also expressed opposition to the project. This development would be on the border of Clarkstown, so that municipality would also be faced with direct issues should this development move forward.

Respectfully, I ask that the Town Board disapprove of this project. This blatant overdevelopment will harm our environment and our suburban way of life. Thank you for your attention to this matter. If you wish to discuss this further, please do not hesitate to contact me at (845) 623-3627.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Carlucci', written in a cursive style.

Senator David Carlucci  
38<sup>th</sup> Senate District



ELLEN C. JAFFEE  
Assemblywoman 97<sup>th</sup> District

THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

CHAIR  
Committee on Children and Families  
COMMITTEES  
Environmental Conservation  
Health  
Mental Health  
Steering Committee  
Education

August 15, 2019

The Honorable Michael Specht  
Supervisor, Town of Ramapo  
237 Route 59  
Suffern, NY 10901

Dear Supervisor Specht,

I am writing in reference to the public hearings scheduled for Thursday, August 15 and Monday, August 19 to urge you, the Town Council members and the Zoning Board Chair to adjourn the hearings until September or thereafter. For such critically important hearings to be held at this point in August when many people are away is not only exclusionary but also obstructive to engaging the residents and the community who will be impacted most in the public comment and decision-making process. Adjourning these "special meetings" will allow for more public participation, more robust public comment and more time for review of the proposals.

As you know from previous public comments I made on August 15, 2018, I have serious concerns regarding the justification and scope of the proposed Pascack Ridge Housing Development. While some might justify the need to provide housing for families with children, this project will not achieve that goal: rather, it will create segregated housing in Hillcrest, one of the most diverse communities in Rockland County. The proposed project will have an enormous impact on the entire community while benefitting only a small segment of the population. The proposed project is not, in fact, a response to the needs of the Hillcrest community: it is a rezoning plan that will benefit two developers at the expense of families with children while setting a dangerous precedent for the entire Town of Ramapo.

Additionally, I share the concerns of Hillcrest residents, my constituents and Rockland residents about the long-term environmental impact of unbridled overdevelopment on our communities, our infrastructure, our water resources and the health and well-being of residents. This rezoning proposal would convert the 27.6 acre environmentally constrained Pascack Ridge area, currently zoned R-15, to an MR-12 zone, potentially quadrupling the density of an area that includes wetlands, waterways, steep slopes and other environmental sensitivities.

More people and more buildings will lead to more passenger vehicles, commercial truck traffic and an increased carbon footprint, all at a time when climate change and its impact on our communities must be addressed in any forward looking comprehensive plan. We as elected

officials have a responsibility to this generation and generations to come to reduce our carbon footprint, protect the environment, and conserve our most precious natural resource: a safe, sustainable, water supply.

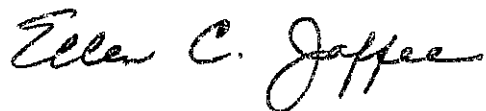
It is clear that the consequences of this proposal will negatively impact the entire community. There will undoubtedly be infrastructure consequences: more roads, sewers, water, and electricity required to sustain the new population. Additionally, there will be a need in the area for more hospitals, firehouses, first responders and private schools. Lastly, there will be new health and safety risks posed to pedestrians.

Once again I respectfully remind the Supervisor of his commitment to “undertake a full review of the Town’s Comprehensive Land Use Plan and Zoning Law” and to “implement a moratorium” on certain types of new development while a Comprehensive Plan that will include the diverse needs of all residents is drafted.

As a member of the NYS Assembly representing this area, I am committed to using any resources within my Assembly jurisdiction, and to work with state oversight agencies, including the Department of State, the DEC, the Division of Human Rights, as well as the Attorney General and Comptroller to stand up for what is right.

In closing, I call on you, the Town Council members and the Zoning Board Chair to adjourn the August 15<sup>th</sup> and 19<sup>th</sup> hearings until September or thereafter.

Sincerely,

A handwritten signature in cursive script that reads "Ellen C. Jaffee". The signature is written in black ink and is positioned above the typed name.

Ellen C. Jaffee  
97th Assembly District

Cc: Rossana Rosado  
Secretary of State of New York



MEMORANDUM

TO: TOWN BOARD, TOWN OF RAMAPO

FROM: JONATHAN LOCKMAN, AICP, PRINCIPAL ENVIRONMENTAL PLANNER  
ON BEHALF OF ROSA 4 ROCKLAND, INC. c/o DEBORAH MUNITZ

SUBJECT: COMMENTS REGARDING PUBLIC HEARING ON PASCACK RIDGE, AUGUST 15, 2019 AT 7PM AT  
RAMAPO TOWN HALL:

1. PROPOSED COMPREHENSIVE PLAN MENDMENTS;
2. LOCAL LAW AMENDING THE ZONING MAP;
3. TECHNICAL ADDENDUM TO THE FEIS FOR PASCACK RIDGE COMPREHENSIVE PLAN  
AMENDMENT AND ZONE CHANGE. LEAD AGENCY: TOWN BOARD OF THE TOWN OF  
RAMAPO

DATE: AUGUST 15, 2019

CC: MAX STACH, AICP, STUART TURNER FAICP, NELSON, POPE & VOORHIS

\*\*\*\*\*

We have reviewed the following materials submitted for the Town of Ramapo Town Board Public Hearing on August 15, 2019, for the preparation of this memorandum:

- Introductory Local Law No. \_ of 2019, A Local Law Amending Chapter 376, Zoning, to Change the Zoning Map of the Town of Ramapo to Rezone Certain Parcels of Land from the R-15 Zoning District Classification to the MR-12 Zoning District Classification; with Exhibit A, Proposed Zoning Map Amendments associated with Pascack Ridge Rezoning Petition, dated 7-1-19.
- Proposed Amendments to the Town of Ramapo Comprehensive Plan in Connection with Pascack Ridge, with Exhibit A, Proposed Land Use Plan Change (Map Change) from Medium Density Residential to Multi-family Residential, dated 7-18-19.
- Pascack Ridge Comprehensive Plan Amendment and Zone Change, Technical Addendum to the Final Environmental Impact Statement (FEIS), undated containing the following:
  - Conceptual Hydraulic and Hydrological Study, Water quality and quantity mitigation, by Atzl, Nasher & Zigler P.C., with latest revision date of July 1, 2019.
  - Conceptual Sewer and Wastewater Estimates by Atzl, Nasher & Zigler P.C., undated.
  - Willingness to Serve letter, from Suez to John Atzl, P.E., RE: Pascack Ridge, dated July 8, 2019.
  - Memorandum on Community Character impacts from proposed rezoning, by Atzl, Nasher & Zigler P.C., undated.
  - Traffic Study, 2020 Build Conditions with Connector (Brookdale Court Extension) to Spring Brook Road, addressed to Alex Goldberger from Harry Baker & Associates, dated July 5, 2019.
  - Wildlife Habitat Assessment for New York State or Federally Listed Threatened or Endangered Species and Species of Special Concert, Pascack Ridge, by Ecological Analysis, LLC, dated June 27, 2019.



- Letter to Donna Holmqvist, Atzl, Nasher & Zigler P.C., RE: Pascack Ridge, from Andrea Chaloux, New York Natural Heritage Program, NYS DEC, dated May 15, 2017.

We reviewed the following materials for the previous review memorandum on this subject, dated May 6, 2019:

- Final Environmental Impact Statement for Pascack Ridge Comprehensive Plan Amendment & Zone Change. Submitted April 4, 2019. Accepted April 8, 2019. Lead Agency: Town Board of the Town of Ramapo. Applicant: Pascack Ridge/Monsey Lumber
- DEIS of May 2018 as referenced in the FEIS, including Appendix G – Comprehensive Plan Amendment, from DEIS for Pascack Ridge, Comprehensive Plan Amendment & Zone Change, May 2018. Lead Agency: Town Board of the Town of Ramapo. Applicant: Pascack Ridge/Monsey Lumber

### **Project Summary**

The action which is the subject of this hearing includes amendments to the Comprehensive Plan, and the rezoning of 27.6 acre site (39 Parcels) in the Town of Ramapo from R-15 to MR-12, to allow the project sponsor to apply for approval of the Pascack Ridge 260 unit multifamily development, for which a concept plan has been proposed. The rezoning from R-15 to MR 12, would permit multifamily units at a density of 12 units per acre. The applicant has also submitted a technical addendum to supplement their Final Environmental Impact Statement for this action.

The site is located on the west side of Pascack Road at the southwest corner of Ewing Avenue and Pascack Road. Pascack Brook and a powerline easement run north-south through the eastern side of site. The west side or uphill side of the site abuts lands in the Village of Spring Valley that have frontage on Rose Avenue. The south side of the site abuts lands in the Towns of Ramapo and Clarkstown that have frontage on Spring Brook Road.

The concept plan for the site (dated 9-17-18) shows construction of 260 dwelling units and associated parking on the 27.6 acres, as well as playground space and a Community Building, all to be known as “Pascack Ridge.”

### **Comments**

1. In response to our comment #1 in our May 6, 2019 memorandum, the text of an actual Comprehensive Plan Amendment has been submitted to be included in the FEIS, along with a Map amending the Future Land Use Plan map of the Comprehensive Plan. We appreciate this responsive submission, but still note the following significant problems:
  - a. The Comprehensive Plan Amendment, both the proposed text and map changes, should be presented along with a local law for adoption, with notice and procedures of Town Law followed, so that it is entirely clear which text and maps are being amended, added or deleted. (We note that a local law has been drafted for the proposed zoning map change, but not for the proposed comprehensive plan changes.) The proposed comprehensive plan amendment document is dated 7-18-19, but there is no indication of authorship.
  - b. We do not find that the interested agencies have been given the opportunity to review the proposed changes to the comprehensive plan proposed in a proper format, particularly the adjacent municipalities and the Rockland County Planning Department. the Town Board should not move forward on the proposed action at this time, until the outside agencies have reviewed and commented on the proposed Comprehensive Plan amendments. These amendments were not prepared until July 18, 2019, and were not available during the DEIS process.
  - c. The proposed comprehensive plan amendments do not provide enough justification of the need for multifamily housing, and an updated housing study should be provided. We provide the following comments on the substance of this submittal:

- i. Section B cites a median monthly rent figure from the 2000 Census, which needs to be updated.
    - ii. Section B states that costs for single family homes are rising but cites no figures whatsoever.
    - iii. Under Planning recommendations and implementation strategies 1b, the existing, adopted recommendation that multifamily projects be located with access to and frontage on major roadways has been weakened, without any justification.
    - iv. Under Planning recommendations and implementation strategies 1c, the existing, adopted recommendation that multifamily projects be located along the Route 59 corridor in central Monsey has been weakened, without any justification.
    - v. The Pascack Ridge Area is proposed to be added to Land Use Plan as an area particularly suitable for multifamily development based upon the considerations outlined in the Housing Chapter. Once again, we find this addition to be lacking any justification.
  - d. The proposed comprehensive plan amendments may lead to unforeseen consequences, setting the stage and allowing for other multifamily projects to be proposed, and allowing petitions for inserting high density housing in a variety of locations outside of the Pascack Ridge setting. Of particular concern to ROSA are the changes to the criteria for creation of multi-family housing districts on pages 3 through 6 of the proposed amendments. The adopted Comprehensive Plan only envisioned multifamily housing at M-12 and M-18 densities along the Route 59 corridor in central Monsey.
2. In response to our comment #2 in our May 6, 2019 memorandum, the zoning map change has been presented in local law format, clearly stating and showing how the zoning map is proposed to be amended.
3. We note that no document has been created summarizing comments submitted on the FEIS (received from our organization or others, along with the applicant's responses to those comments. ROSA 4 Rockland prepared two documents submitted May 6, 2019. We appreciate the applicant's responses to several of our comments, but would appreciate acknowledgement of all comments submitted, with brief responses, as is required in the DFEIS.
4. No submission has been made correcting the Floodplain depiction that was the subject of our comment #3 in our May 6, 2019 memorandum. The FEMA Floodplain shown on the concept plan for the proposed Pascack Ridge development is a somewhat different shape and size than the depiction on the official FEMA Flood Insurance "Firmette" map, downloaded from FEMA's website (see figures below). The current, officially mapped floodplain on Flood Insurance Rate Maps was revised in 2014, and the extent shown on the current Concept Plan included in the FEIS may have used outdated information from previous applications at the site.



Current AE Zone extends along Christa Lynn Dr which differs from the location shown on Concept Plan

<b>PHI</b> Appropriate location based on user input and does not represent an authoritative property location <b>MAP PANELS</b> Selected FloodMap Boundary Digital Data Available No Digital Data Available Unmapped <b>NO DATA</b> Area of Minimal Flood Hazard 200 ft Effective CHANCE Area of Unimproved Flood Hazard Zone 0 Other Areas Other Areas Coastal Barrier Protection System Area	<b>SPECIAL FLOOD HAZARD AREAS</b> Vertical Datum Flood Elevation (DFE) 100 Year AEP or Greater Regulatory Frequency Zone 100, 50, 25, 10, 5, 2, 1 0.2% Annual Chance Flood Hazard, Areas of 1% Annual Chance Flood with average depth less than one foot or with average area of less than one square mile 200-Y Future Drought 1% Annual Chance Flood Hazard Zone 0 Area with Reduced Flood Risk due to Levee, Dam, Wall, etc. Area with Flood Risk due to Levee, Dam, etc.	<b>OTHER AREAS OF FLOOD HAZARD</b> Vertical Datum Flood Elevation (DFE) 100 Year AEP or Greater Regulatory Frequency Zone 100, 50, 25, 10, 5, 2, 1 0.2% Annual Chance Flood Hazard, Areas of 1% Annual Chance Flood with average depth less than one foot or with average area of less than one square mile 200-Y Future Drought 1% Annual Chance Flood Hazard Zone 0 Area with Reduced Flood Risk due to Levee, Dam, Wall, etc. Area with Flood Risk due to Levee, Dam, etc.	<b>OTHER FEATURES</b> Cross Sections with 1% Annual Chance Water Surface Elevation Coastal Transport Deep Flood Elevation Line (DFE) Limit of Study Jurisdiction Boundary Coastal Transport Section Profile Baseflow Hydrographic Feature <b>GENERAL STRUCTURES</b> Channel, Culvert, or Storm Sewer Levee, Dam, or Floodwall
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Current AE Zone shape differs from that shown on Concept Plan

<b>PHI</b> Appropriate location based on user input and does not represent an authoritative property location <b>MAP PANELS</b> Selected FloodMap Boundary Digital Data Available No Digital Data Available Unmapped <b>NO DATA</b> Area of Minimal Flood Hazard 200 ft Effective CHANCE Area of Unimproved Flood Hazard Zone 0 Other Areas Other Areas Coastal Barrier Protection System Area	<b>SPECIAL FLOOD HAZARD AREAS</b> Vertical Datum Flood Elevation (DFE) 100 Year AEP or Greater Regulatory Frequency Zone 100, 50, 25, 10, 5, 2, 1 0.2% Annual Chance Flood Hazard, Areas of 1% Annual Chance Flood with average depth less than one foot or with average area of less than one square mile 200-Y Future Drought 1% Annual Chance Flood Hazard Zone 0 Area with Reduced Flood Risk due to Levee, Dam, Wall, etc. Area with Flood Risk due to Levee, Dam, etc.	<b>OTHER AREAS OF FLOOD HAZARD</b> Vertical Datum Flood Elevation (DFE) 100 Year AEP or Greater Regulatory Frequency Zone 100, 50, 25, 10, 5, 2, 1 0.2% Annual Chance Flood Hazard, Areas of 1% Annual Chance Flood with average depth less than one foot or with average area of less than one square mile 200-Y Future Drought 1% Annual Chance Flood Hazard Zone 0 Area with Reduced Flood Risk due to Levee, Dam, Wall, etc. Area with Flood Risk due to Levee, Dam, etc.	<b>OTHER FEATURES</b> Cross Sections with 1% Annual Chance Water Surface Elevation Coastal Transport Deep Flood Elevation Line (DFE) Limit of Study Jurisdiction Boundary Coastal Transport Section Profile Baseflow Hydrographic Feature <b>GENERAL STRUCTURES</b> Channel, Culvert, or Storm Sewer Levee, Dam, or Floodwall
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- There has been no response to our comment #4 in our May 6, 2019 memorandum. There is not adequate space to squeeze the 56 units shown on the Concept Plan in the FEIS (Figure 4, following page 5), between the Pascack Brook and the edge of Pascack Road. We would recommend that the area proposed for rezoning east of the brook be developed according to the R-15 average density alternative shown in FEIS

figure 8 (following FEIS page 11). The proposed map changes for both the zoning map and comprehensive plan future land use map should be amended so the eastern boundary of the proposed M-12/multifamily district runs along the west side of the powerline easement. We see that M-12 is inappropriate east of the easement, because of possible flooding issues for proposed buildings on lots 57.07-1-5, 57.07-1-7 and 57.07-1-8. These three lots clearly are more suitable for single family development, as the rear portions are largely taken up by floodplain.

6. Regarding our comment #5 in our May 6, 2019 memorandum, we note that there still is only one applicant listed on the FEIS that was accepted on April 8, 2019 – Monsey Lumber. On the DEIS, dated May 2018 (as posted on the Town of Ramapo Building Department web page), the applicants are stated as: Monsey Lumber; Union Collins Realty; and 171 North Pascack Road Corporation. This discrepancy needs to be remedied. The applicants on the DEIS and FEIS should be the same.
7. A submission from Harry Baker and Associated was included in the Technical Addendum to the DEIS. However, this material was not responsive to our comment #6 in our May 6, 2019 memorandum. There is still a contradiction in the submissions regarding the ownership status of the proposed Brookdale Court extension. On the FEIS page 6, it is stated that Brookdale Court Extension “will be offered as a dedicated road,” and “will be constructed in accordance with the Town specifications.” However, on Drawing 5, “Changes to the Proposed Action,” an annotation pointing to Brookdale Court Extension indicates: “Brookdale Court Extension proposed as a dedicated road for emergency services, police and school bus.” This implies that the dedication would not be for a fully public road with general public access, but rather for only partial access, for emergency and school vehicles. This is not workable. Would a gate be employed?

In our previous comment #6 of May 6, 2019, we noted that an area is proposed to be dedicated for a new cul-de-sac at the end of Spring Brook Road. This design does not make sense, given that if the Spring Brook ROW were simply extended about 400 feet north, it would intersect with the extension of “Barnes Street” (also known as Rosehill Oval) that is now being extended into apartments under construction at the Homer Lee Corp. property in the Village of Spring Valley. A dedicated public extension of Spring Brook Road westward to Rose Avenue would disperse traffic by creating more street accesses for the new residential units, and would create a useful traffic connection through to Rose Avenue. It never makes sense to create a cul-de-sac just short of another major street. We note that in a recent presentation of the Northeast Ramapo Strategy, the Town’s consultant presented the plans for the development around the Town golf course and promoted the desirability of connected streets with no cul-de-sacs.

We would strongly recommend that Brookdale Court Extension be built to full Town standards and be dedicated as a completely public road from Ewing Avenue to Spring Brook Road, in order to build a public street network to support the planned growth of the Hillcrest area. The extension of Spring Brook Road westward to Rose Avenue should also be dedicated as a fully public street to create a “block” of public streets around this newly planned dense neighborhood. If this area of Hillcrest is to be developed as a dense extension of the Village of Spring Valley pattern of apartment uses of Rose Avenue, it should be provided with an extended public road network.

8. No changes to the site plan have been proposed in response to our comment #7 in our May 6, 2019 memorandum. The proposed design for MR 12 violates front yard restrictions. Along the frontage on the west side of Pascack Road, Town of Ramapo existing zoning code prohibits parking areas in the first 35 feet, the required front yard, according to the bulk standards for x.4 multifamily uses in MR 12. Furthermore, §376-51 does not make any exemption allowing parking in the front setback for MR 12

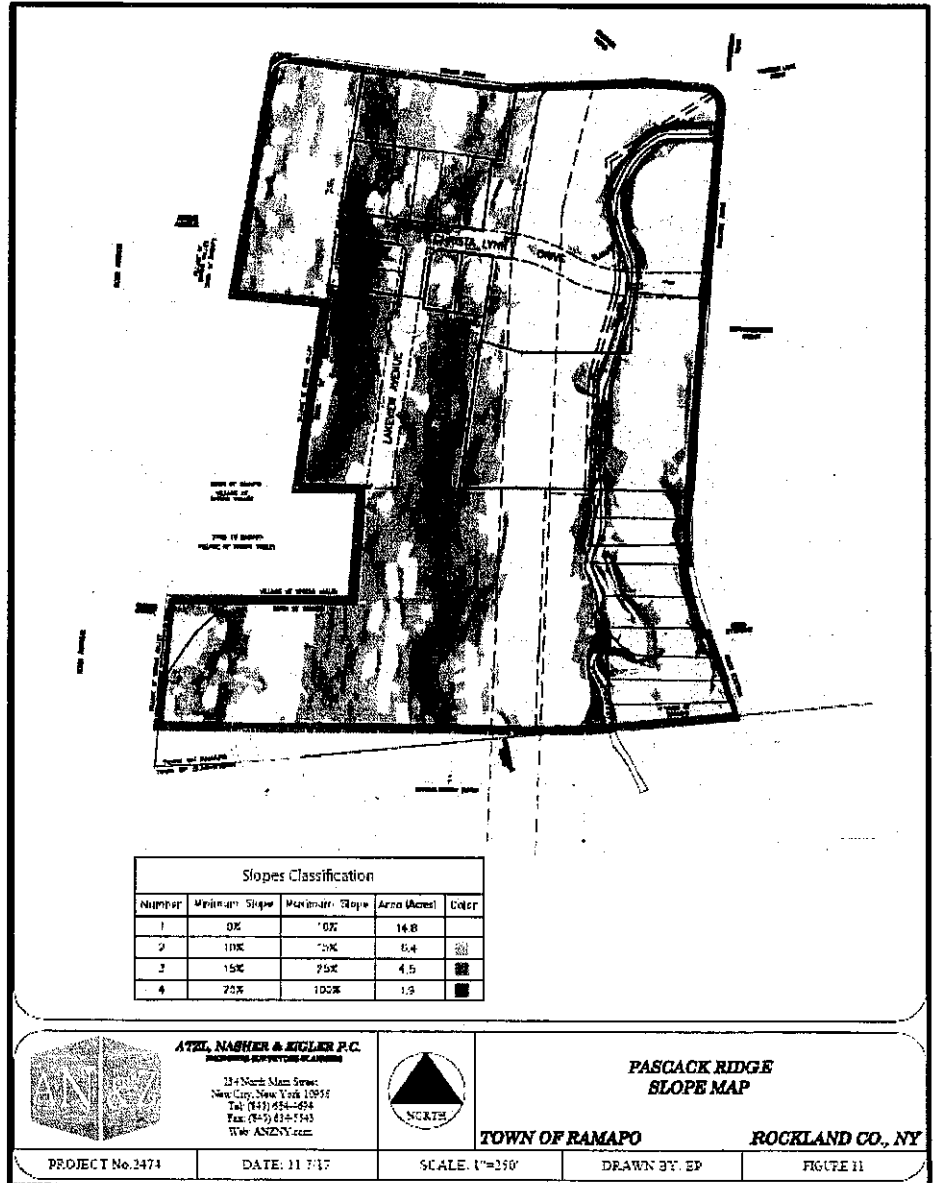
uses. Therefore, the parking shown all along the Pascack Road frontage is unworkable. The same issue also applies to the parking areas set up within the 35-foot front yards along the west side of Brookvale Court Extensions, which would also need to be moved further from the road. Furthermore, such front yard parking is even prohibited currently in the existing bulk standards for R-15, which applies to this site without the proposed action.

9. We do not find that the Memorandum on Community Character, submitted as part of the Technical Addendum to the FEIS, adequately responds to our comment #8 in our May 6, 2019 memorandum. New maps have been submitted showing the context of the proposed Pascack Ridge development, including the densities of the existing housing units of surrounding blocks. See figures 1 through 4 and figure 9.) Rezoning the subject area to MR 12, does not serve as a “transition” from the densities of existing and future apartment developments to the west in the Rose Avenue area in the Village of Spring Valley to the single-family neighborhoods on the east side of Pascack Road. Figure 3 shows that the density on the east side of Pascack Road is between 2.49 and 3.14 units per acre, which is a drastic contrast to the 12 units per acre proposed at Pascack Ridge. If this site in the Town of Ramapo were to be rezoned, it should be at a density which is a “step down” from the mostly two-story multifamily developments found in the nearby other jurisdictions, to provide a reasonable transition to R-15 districts to the east.

The concept plan has not been amended in response to our comment #8 in our May 6, 2019 memorandum. No response has been submitted regarding impacts from the extensive grading proposed on the steep slopes found west of the powerline easement, which clearly area not compatible with the density allowed by MR-12 zoning. See Figure 11 from the FEIS (following page 67) which is shown on the next page. Given the fact that 6.4 acres of the site are found with slopes of 15% or greater, and these steep areas are concentrated west of the powerline easement where most of the units are designed to be placed, the amount of grading will be excessive to create the parking lots, drives and building footprints at the density allowed by MR-12. Virtually all the steep slope hillside areas west of the powerline easement will need to be graded flat to fit the proposed development.

10. We reiterate our comment #9 from May 6, 2019. The east side of the site from the high voltage powerline easement and Pascack Brook to Pascack Road is relatively flat, and these lands relate visually and are oriented to the existing Witherspoon Drive and Danville Road single family development and the Pascack Road corridor. The rising land on the site, west of the powerline easement, relates more to the high-density development at the top of the hill along Rose Avenue, where multifamily development is expanding in the Village of Spring Valley under its PRD overlay zoning. From a land use planning perspective, it would make far more sense if only the western side of the site were rezoned, and the portions of land east of the powerline easement remained as R-15 (see comment 4 above). There is no compelling reason for the entire site to be zoned MR-12 which would create conflicts with the single family uses along Pascack Road, and crowd multiple units along the Pascack Brook floodplain. This use of the powerline easement and brook as the eastern rezoning boundary (rather than Pascack Road) truly would allow for a transition from the Spring Valley multifamily land uses to the single-family nature of Danville Road and Witherspoon Drive, and the homes along the east side of Pascack Road. The applicant should provide an alternative where only the west side of the parcel is proposed to be rezoned.

11. In response to our comment #10 of May 6, 2019, a conceptual hydraulic and hydrological drainage study, considering both water quality and quantity mitigation, has been submitted as part of the FEIS Technical Addendum. This submittal justifies and amplifies our previous concerns. Figure 11 shows the locations of four proposed infiltration basins that were not shown on the Concept Plan (sheet 4, dated September 17, 2018) that we reviewed in our previous memorandum. These four proposed infiltration basins are placed in the recreation areas that had been previously designated, eliminating most of the recreation space proposed for Pascack Ridge. Proposed Basin #1 eliminates the community recreational area that had been proposed south of



the ACOE wetland and north of the brook, at the southwest side of the site. Proposed Basin #2 eliminates about half of the recreation area north of the Christa Lynn Drive bridge. Proposed Basin #3 eliminates the road access to the Christa Lynn Drive bridge from Pascack Road. Proposed Basin #4 eliminates the playground areas behind proposed buildings M and N. It is apparent that the project as currently sized cannot provide enough area for both recreation and stormwater management, and therefore should be downsized.

12. Our comment #11 of May 6, 2019 has not been addressed. Regarding fiscal impacts and projected school-aged population, it cannot reasonably be relied upon that 75% of students will choose public education. See page 122 of FEIS. While certain religious or ethnic groups may be found in Rockland County with such high rates of privately educated students, it would not be prudent to plan for rezoning of this area of Hillcrest on the assumption that only religious families who use private education will move into these housing units. Estimates of projected impacts on school enrollment should be provided

with overall averages of the population, rather than relying on the assumption that only religious families will be occupying the project.

13. Our comment #12 in our memorandum of May 6, 2019 has not been addressed. Regarding unit size and parking requirements, we note that in FEIS response 5.2-11 on page 126, the applicant states that half of the units (or 110) would be 5-bedrooms, and half of the units (or 110) will be 2-bedrooms. Parking requirements in the Town of Ramapo for multifamily dwellings in all MR zones are 2 spaces per dwelling unit. We reviewed each of the parking lots on the concept plan and found that the densest part of the proposed concept plan development, rates of parking provided are all below 2 parking spaces per unit. For the duplexes and smallest buildings along Pascack Road, many are provided with more than 2 parking spaces per unit. See table below:

<b>Building Designation</b>	<b>Parking Spaces Provided per Unit</b>
Buildings 1 & 4	1.5
Buildings 2 & 3	1.6
Building 5	1.5
Buildings 6,7,8	1.35
Buildings 9 & 14	1.31
Buildings 10,11, 12, 13	1.31
Buildings 15, 16	1.7
Building J	2
Building K	1.3
Building L	2.5
Building M	2.5
Building N	2.5
Buildings O,P	1.6

In general, the pattern in the concept plan is that the dense areas west of the powerline easement are “underparked,” with too little parking provided. The areas east of the Pascack Brook appear to be “overparked.”

14. Our comment #13 in our memorandum of May 6, 2019 has not been addressed. Adequate sidewalk circulation is not shown in the Concept Plan. Everyone in the proposed Pascack Ridge development should be able to walk on a sidewalk system to other units in the complex, to the community center, and to all playgrounds.
15. Our comment #14 in our memorandum of May 6, 2019 has not been addressed. The amount of community recreation and play areas needs to be clarified, particularly since much of the recreation area proposed in the concept plan has been eliminated to provide room for proposed stormwater infiltration basins. See our comment 10 above. On page 35 of the FEIS, it is stated in response to comment 2.1-4 that 15 acres of total open space will be provided, which would leave 12.6 acres remaining for development. A chart should be provided indicating a breakout of the acreages of all undeveloped areas, which adds up to 15 acres. The comment further states that: “the concept plan indicates 2.8 acres for community recreation which is publicly accessible, and 8000 sq. ft. of playground area broken into smaller areas located near different building clusters.” The concept plan drawing shows a 1.1 acre “area for community facilities” near the “community center,” and a 28,200 sq. foot “community recreational area” between the river and the ACOE wetland on the south. The stormwater management figure 11 in the

Technical Addendum to the FEIS shows these areas shown on the Concept Plan as being taken up by infiltration basins. It is unclear how this adds up to 2.8 acres of publicly accessible recreation land. See also on page 5 where it is stated that "Apart from the landscaping and maintenance of open space in and around the Orange and Rockland easement area, 2.8 acres of publicly accessible open space has been provided for community recreation." The amounts of undeveloped land proposed, as well as a definition of publicly accessible (whether general public or residents) should be provided.

The Town's stated objective from Subdivision Regulations §44 states: "When recreation areas are required, the Planning Board shall determine the number of acres to be reserved from the following table, which has been prepared on the basis of providing three (3) acres of recreation area for every one hundred (100) families." Under this standard a development with 260 families would require 7.8 acres of recreation area. The regulation goes on to state: "*Minimum size of park and playground reservations. In general, land reserved for recreation purposes shall have an area of at least four (4) acres. When the percentages from the table above would create less than four (4) acres, the Board may require that the recreation area be located at a suitable place on the edge of the subdivision so that additional land may be added at such time as the adjacent land is subdivided. In no case shall an area of less than two (2) acres be reserved for recreation purposes if it will be impractical or impossible to secure additional lands in order to increase its area. Where recreation land in any subdivision is not reserved, or the land reserved is less than the percentage in § 44A(1), the provisions of § 44E shall be applicable.*" The Pascack Ridge proposed development does not meet these Town standards for the provision of recreation space in subdivisions.

16. Our comment #15 in our memorandum of May 6, 2019 has not been addressed. No dumpster/snow storage locations are shown in any of the proposed parking areas.
17. We reiterate our prior comment #16 of May 6, 2019. Several of the issues raised above cumulatively make the concept plan dated September 17, 2018 as unworkable. Submittals received after the May 2019 to supplement the FEIS have in some cases raised additional problems rather than assuaging our concerns. Total units will need to be reduced to accommodate the following:
  - a. Provision of 2 parking spaces per unit.
  - b. Set aside of adequate acreage to create a functional stormwater system for multiple large buildings and half-dozen parking lots on the hillside west of the powerline easement, as well as recreation space for residents meeting the Town's standards based on the number of proposed units in the development.
  - c. Provision of spaces for snow storage and solid waste dumpster locations.
  - d. Provision of safe distance from the Pascack Brook floodplain.
  - e. Provision of front yards without parking.
  - f. Provision of retaining walls at the uphill sides of building and parking areas.
18. We reiterate our prior comment #17 of May 6, 2019. We have reviewed the Rockland County GML review letter of August 27, 2018, commenting on the Pascack Ridge Comprehensive Plan and Zone Change Amendment DEIS. We concur with this review, and urge the Town of Ramapo not to override these recommendations and therefore to stop moving forward with this SEQR process. We see little mitigation of the County's concerns in the submittals since May 2019. Of particular concern are County Comments #10, 13, 15, 17, 18, 19, 20, 21 which we do not believe have been addressed in revisions of or supplements to the FEIS.



19. In response to our comment #18 of May 6, 2019, we note that notice to this upcoming hearing on August 15, 2019 has been posted to the DEC SEQR Environmental Notice Bulletin. However, the earlier FEIS hearing in May 2019 was not posted as required by SEQRA. The latest postings from the Town of Ramapo on the Environmental Notice Bulletin prior to the notice for the August 15, 2019 hearing, were announcing the August 2018 DEIS hearing.
20. Given the condition of the application, we do not believe that the lead agency can make findings meeting the SEQRA requirements of 6 CRR-NY 617.11, subpart (d), namely:
- “Findings must*
- (1) consider the relevant environmental impacts, facts and conclusions disclosed in the final EIS;*
- (2) weigh and balance relevant environmental impacts with social, economic and other considerations;*
- (3) provide a rationale for the agency's decision;*
- (4) certify that the requirements of this Part have been met; and*
- (5) certify that consistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigative measures that were identified as practicable.”*
21. Once the application reaches the findings stage, we recommend that the Village Board amend the proposed local law to include provisions that cap the size of the development and tie the rezoning to the concept plan design for Pascack Ridge that you have been reviewing. Once the local law is adopted, ROSA 4 Rockland would like to be assured that the future site plan and subdivision applications for Pascack Ridge adhere to the framework and parameters of the project design that is part of this GEIS. After all of the work that the Village Board has put into this review, we urge you to ensure that the future application to construct the project will follow the road layout, building placement, unit count, provision of open space, and other aspects of the concept plans submitted for this SEQRA review. The findings should contain provisions to make sure that this will happen during the next steps in the Pascack Ridge development process.
22. We continue to request that the Town ask the applicants to work with representatives of ROSA 4 for Rockland, as well as other stakeholders and members of the public, to develop a solution for rezoning the subject site that would meet the following goals:
- a. If the site is to be rezoned, provide a true “step down” and transition between the higher density residential development to the west and south of the site, and to the R-15 zoned areas east of Pascack Brook and the powerline easement. Rather than rezone the entire site as MR-12, keep the area east of the powerline easement within the existing R-15 zoning district.
  - b. Reduce the grading and impacts on steep slopes on the western side of the site, and provide adequate land area for both stormwater management and recreation, as required by Town codes. We urge the Town of Ramapo Town Board to press the applicant to provide both public and private recreational amenities, and not to sacrifice such amenities when providing required stormwater management facilities;
  - c. To mitigate the extensive grading of steep slopes on this hillside, reduce the number of units allowed by this rezoning by reducing the acreage rezoned to MR-12, or by rezoning the site to MR-8 instead.
  - d. Make a more extensive effort to amend the Comprehensive Plan by adding housing and demographic statistics to properly justify adding available areas for multifamily housing.

- e. Provide an adequate public street and sidewalk network to connect the proposed development to the community, on all sides of the site. Brookvale Court Extension should be a full public street with public sidewalks connecting to all surrounding neighborhoods; and
- f. Provides public recreational amenities, public sidewalk and street connections, and other public benefits to the surrounding neighborhoods, in exchange for the Town providing rezoning to allow higher residential densities. Room should be provided on site for all these public amenities, without sacrificing any to provide drainage features.

Please let us know if you have any comments and questions regarding this review.

Speakers  
3

**Remarks:** Jonathan Lockman, AICP, Principal Environmental Planner, Nelson, Pope & Voorhis, Representing ROSA 4 Rockland

**Hearing:** Town of Ramapo Town Board, August 15, 2019, 7 PM

**RE:** Pascack Ridge – Comp Plan Amendments, Zoning Changes, Technical Addendum to FEIS

We have prepared an 11-page memo with 22 points, which I would like to submit for the record, reviewing the Comprehensive Plan Amendments, Zoning Changes, Technical Addendum to the FEIS

Here is a summary of the major comments from our review memorandum.

### **Comp Plan Amendments**

1. We do not find that the interested agencies have been given the opportunity to review the proposed changes to the comprehensive plan proposed in a proper format, particularly the adjacent municipalities and the Rockland County Planning Department. These amendments were not prepared until July 18, 2019, and they were not available during the DEIS process. The Town Board should not move forward on the proposed action at this time, until the outside agencies have reviewed and commented on these proposed Comprehensive Plan amendments.
2. The proposed comprehensive plan amendments do not provide enough justification of the need for multifamily housing, and an updated housing study should be provided.
  - a. Statistics on housing costs are cited from the 2000 Census, which needs to be updated.
  - b. Comp Plan recommendations that multifamily projects be located with access to and frontage on major roadways has been weakened, without any justification.
  - c. These proposed comprehensive plan amendments may lead to unforeseen consequences, setting the stage and allowing for other multifamily projects to be proposed, and allowing petitions for inserting high density housing in a variety of locations outside of the Pascack Ridge setting. Of particular concern to ROSA are the changes to the criteria for creation of multi-family housing districts on pages 3 through 6 of the proposed amendments. The adopted Comprehensive Plan only envisioned multifamily housing at M-12 and M-18 densities along the Route 59 corridor in central Monsey.

### **Plans for Pascack Ridge Developments**

3. **-Brookdale Court Status.** On the FEIS page 6, it is stated that Brookdale Court Extension “will be offered as a dedicated road,” and “will be constructed in accordance with the Town specifications.” However, on Drawing 5, “Changes to the Proposed Action,” an annotation pointing to Brookdale Court Extension indicates: “Brookdale Court Extension proposed as a dedicated road for emergency services, police and school bus.” This implies that the dedication would not be for a fully public road with general public access, but rather for only partial access, for emergency and school vehicles. This is not workable.

4. **Spring Brook Road Cul-de-sac.** We noted that an area is proposed to be dedicated for a new cul-de-sac at the end of Spring Brook Road. This design does not make sense, given that if the Spring Brook ROW were simply extended about 400 feet north, it would intersect with the extension of " Barnes Street" (also known as Rosehill Oval) that is now being extended into apartments under construction at the Homer Lee Corp. property in the Village of Spring Valley. A dedicated public extension of Spring Brook Road westward to Rose Avenue would disperse traffic by creating more street accesses for the new residential units, and would create a useful traffic connection through to Rose Avenue. It never makes sense to create a cul-de-sac just short of another major street. We note that in a recent presentation of the Northeast Ramapo Strategy, the Town's consultant presented the plans for the development around the Town golf course and promoted the desirability of connected streets with no cul-de-sacs.
5. **Grading of Steep Slopes.** No response has been submitted regarding impacts from the extensive grading proposed on the steep slopes found west of the powerline easement, which clearly area not compatible with the density allowed by MR-12 zoning. Given the fact that 6.4 acres of the site are found with slopes of 15% or greater, and these steep areas are concentrated west of the powerline easement where most of the units are designed to be placed, the amount of grading will be excessive to create the parking lots, drives and building footprints at the density allowed by MR-12. Virtually all the steep slope hillside areas west of the powerline easement will need to be graded flat to fit the proposed development.
6. **Drainage Systems Instead of Recreation Areas.** Four proposed infiltration basins are shown in the technical addendum hydraulics submission that were not shown on the Concept Plan. These four proposed infiltration basins are placed in the recreation areas that had been previously designated, eliminating most of the recreation space proposed for Pascack Ridge. Proposed Basin #1 eliminates the community recreational area that had been proposed south of the ACOE wetland and north of the brook, at the southwest side of the site. Proposed Basin #2 eliminates about half of the recreation area north of the Christa Lynn Drive bridge. Proposed Basin #3 eliminates the road access to the Christa Lynn Drive bridge from Pascack Road. Proposed Basin #4 the playground areas behind proposed buildings M and N. It is apparent that the project as currently sized cannot provide enough area for both recreation and stormwater management, and therefore should be downsized.
7. **Sidewalks.** Adequate sidewalk circulation is not shown in the Concept Plan. Everyone in the proposed Pascack Ridge development should be able to walk on a sidewalk system to other units in the complex, to the community center, and to all playgrounds.
8. **Recreation Standards Not Met.** The amount of community recreation and play areas needs to be clarified, particularly since much of the recreation area proposed in the concept plan has been eliminated to provided room for proposed stormwater infiltration basins. The FEIS further states that: "the concept plan indicates 2.8 acres for community recreation which is publicly accessible, and 8000 sq. ft. of playground area broken into smaller areas located near different building clusters." The concept plan drawing shows a 1.1 acre "area for community

facilities” near the “community center,” and a 28,200 sq. foot “community recreational area” between the river and the ACOE wetland on the south.

The stormwater management figure 11 in the Technical Addendum to the FEIS shows these areas shown on the Concept Plan as being taken up by infiltration basins. It is unclear how this adds up to 2.8 acres of publicly accessible recreation land.

The Town’s stated objective from Subdivision Regulations §44 states: “When recreation areas are required, the Planning Board shall determine the number of acres to be reserved from the following table, which has been prepared on the basis of providing three (3) acres of recreation area for every one hundred families.” Under this standard a development with 260 families would require 7.8 acres of recreation area. The Pascack Ridge proposed development does not meet these Town standards for the provision of recreation space in subdivisions.

### **Proposed Zoning Change**

9. **Do Not Rezone Areas East of the Powerline Easement.** The east side of the site from the high voltage powerline easement and Pascack Brook to Pascack Road is relatively flat, and these lands relate visually and are oriented to the existing Witherspoon Drive and Danville Road single family development and the Pascack Road corridor. The rising land on the site, west of the powerline easement, relates more to the high-density development at the top of the hill along Rose Avenue, where multifamily development is expanding in the Village of Spring Valley under its PRD overlay zoning. From a land use planning perspective, it would make far more sense if only the western side of the site were rezoned, and the portions of land east of the powerline easement remained as R-15. There is no compelling reason for the entire site to be zoned MR-12 which would create conflicts with the single family uses along Pascack Road, and crowd multiple units along the Pascack Brook floodplain. This use of the powerline easement and brook as the eastern rezoning boundary (rather than Pascack Road) truly would allow for a transition from the Spring Valley multifamily land uses to the single-family nature of Danville Road and Witherspoon Drive, and the homes along the east side of Pascack Road. The applicant should provide an alternative where only the west side of the parcel is proposed to be rezoned.
10. **Make a True Step-down Zone.** Rezoning the subject area to MR 12, does not serve as a “transition” from the densities of existing and future apartment developments to the west in the Rose Avenue area in the Village of Spring Valley to the single-family neighborhoods on the east side of Pascack Road. Figure 3 shows that the density on the east side of Pascack Road is between 2.49 and 3.14 units per acre, which is a drastic contrast to the 12 units per acre proposed at Pascack Ridge. If this site in the Town of Ramapo were to be rezoned, it should be at a density which is a “step down” from the mostly two-story multifamily developments found in the nearby other jurisdictions, to provide a reasonable transition to R-15 districts to the east.

### **SEQRA Process**

11. **Not Ready for Findings Step.** Given the condition of the application, we do not believe that the lead agency can make findings at this time meeting the SEQRA requirements.
  
12. **Tie Concept Plan to Findings.** Once the application reaches the findings stage, we recommend that the Village Board amend the proposed local law to include provisions that cap the size of the development and tie the rezoning to the concept plan design for Pascack Ridge that you have been reviewing. Once the local law is adopted, ROSA 4 Rockland would like to be assured that the future site plan and subdivision applications for Pascack Ridge adhere to the framework and parameters of the project design that is part of this GEIS. After all of the work that the Village Board has put into this review, we urge you to ensure that the future application to construct the project will follow the road layout, building placement, unit count, provision of open space, and other aspects of the concept plans submitted for this SEQRA review. The findings should contain provisions to make sure that this will happen during the next steps in the Pascack Ridge development process.

### **Conclusions**

13. We continue to request that the Town ask the applicants to work with representatives of ROSA 4 for Rockland, as well as other stakeholders and members of the public, to develop a solution for rezoning the subject site that would meet the following goals:
  - a. If the site is to be rezoned, provide a true “step down” and transition between the higher density residential development to the west and south of the site, and to the R-15 zoned areas east of Pascack Brook and the powerline easement. Rather than rezone the entire site as MR-12, keep the area east of the powerline easement within the existing R-15 zoning district.
  - b. Reduce the grading and impacts on steep slopes on the western side of the site and provide adequate land area for both stormwater management and recreation, as required by Town codes. We urge the Town of Ramapo Town Board to press the applicant to provide both public and private recreational amenities, and not to sacrifice such amenities when providing required stormwater management facilities;
  - c. To mitigate the extensive grading of steep slopes on this hillside, reduce the number of units allowed by this rezoning by reducing the acreage rezoned to MR-12, or by rezoning the site to MR-8 instead.
  - d. Make a more extensive effort to amend the Comprehensive Plan by adding housing and demographic statistics to properly justify adding available areas for multifamily housing.
  - e. Provide an adequate public street and sidewalk network to connect the proposed development to the community, on all sides of the site. Brookvale Court Extension should be a full public street with public sidewalks connecting to all surrounding neighborhoods; and
  - f. Provides public recreational amenities, public sidewalk and street connections, and other public benefits to the surrounding neighborhoods, in exchange for the Town providing rezoning to allow higher residential densities. Room should be provided on site for all these public amenities, without sacrificing any to provide drainage features.

We are very concerned about the current re-zoning letter we received this week. I am mostly worried about what affects this restructuring is going to have on the value and quality of life, and of property. It's going to HAVE impacted on our neighborhood.

Pascack RIDGE ENVIRONMENTAL IMPACT:

The first impact I can see and other are as follows:

No more spaces for wildlife causing them to invade the living space of our community. (Deer, rabbits, squirrels, raccoons , & etc.)

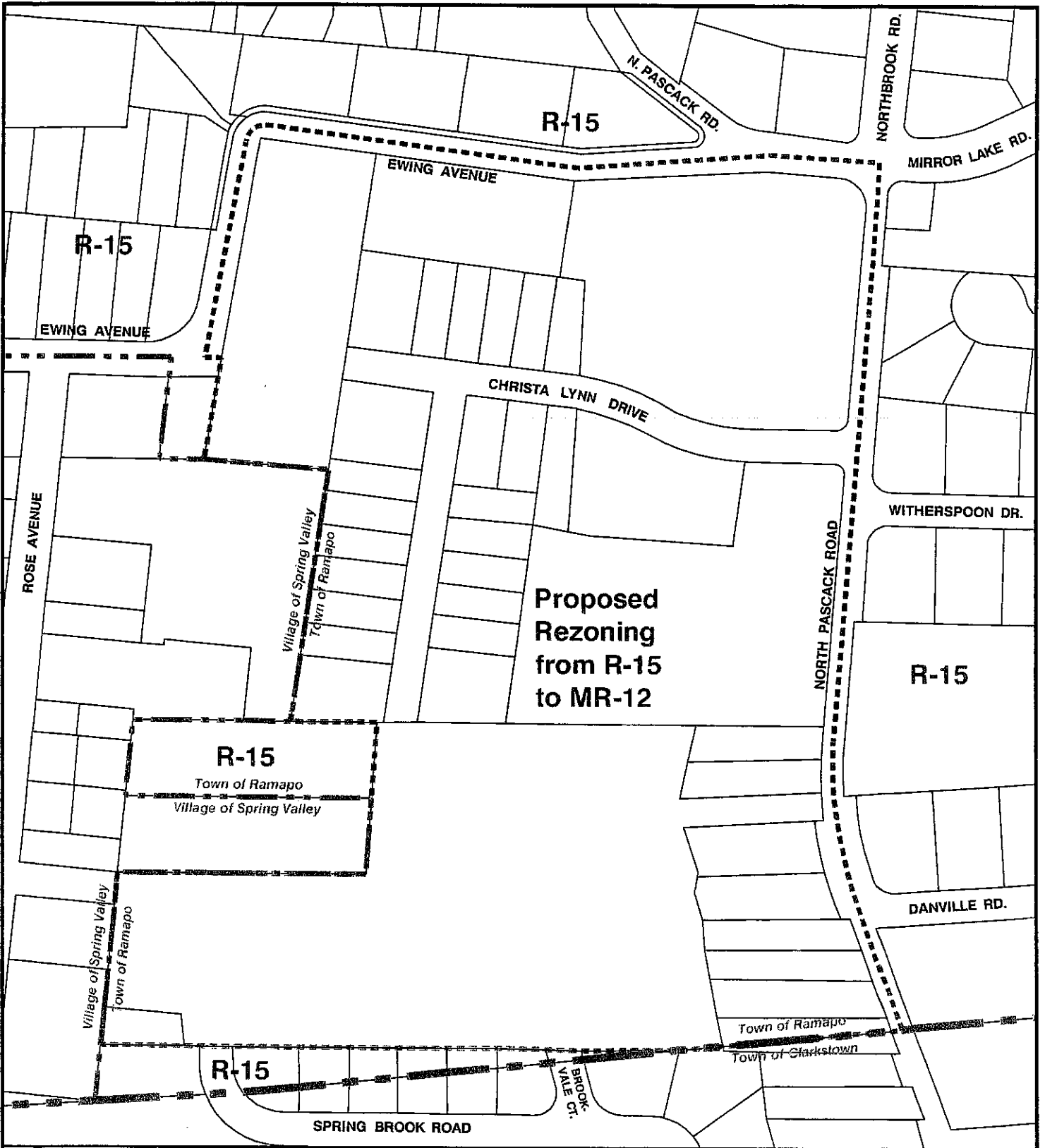
Natural vegetation disrupted and the ills that causes ,Insects where will they go???

Drainage , where will the rain water go that gets absorbed by the vegetation , we already have a runoff problem in this area every since we moved here over 30 years ago.

Traffic, if they restructure roads entering into the now dead-in space , the street will no longer be safe for kids or seniors living on street/s (?) regarding severity of this impact.

To the Town of RAMAPO- REGARDING RE-ZONING that will adversely impact our livelihood ,& land futures of Spring Brook .

Concerned residents: Mr. & Mrs. Avinger of Spring Brook Rd Nanuet,  
NY



**LEGEND:**

----- Proposed Zoning District Boundary

**PROPOSED ZONING MAP  
AMENDMENTS ASSOCIATED  
WITH PASCACK RIDGE  
REZONING PETITION  
Ramapo, New York**

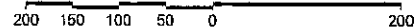


**FREDERICK P. CLARK ASSOCIATES  
A HARDESTY & HANOVER COMPANY**

Exhibit

Scale in Feet

**A**





**ROCKLAND COUNTY SEWER DISTRICT NO. 1**

4 Route 340  
Orangeburg, New York 10962  
Phone: (845) 365-6111 Fax: (845) 365-6686  
RCSD@co.rockland.ny.us

**George Hoehmann**  
*Chairman*

**Dianne T. Philipps, P.E.**  
*Executive Director*

August 26, 2019

Mr. Dennis Lynch  
Office of the Town Attorney  
Town of Ramapo  
237 Route 59  
Suffern, NY 10901

Re: Pascack Ridge Comprehensive Plan Amendment and Zone Change  
Technical Addendum to Final Environmental Impact Statement (FEIS)  
Tax Lots 89/50.19-1-44 through 53, 50.19-1-55 through 72, 57.07-1-2 through 5, and 57.07-1-7, 8, 8.1, 9, 10 & 19 (formerly 15./210, 215A7, 215A, 215A6, 215A5, 215A4, 215A3, 215A2, 215A1, 215B1, 215B2, 215B5, 215B7, 215B9, 215B11, 215B13, 215B15, 215B16, 215B17, 215B14, 215B12, 215B10, 215B8, 215B6, 215B3, 215B4, 215BB1, 215BB2, 215C, 220B, 220A, 221A, 221B, 224, 226, 228, 230, 234, 237, 240 & 266)

Dear Mr. Lynch:

The District has received and reviewed correspondence dated August 2, 2019 from your office and a Technical Addendum to the FEIS that Atzl, Nasher & Zigler prepared for the Pascack Ridge project. We thank you for the opportunity to comment on this application. Our comments are as follows:

1. Page 3 of Section I.II (Wastewater – Conceptual Sewer & Wastewater Estimates) of the Technical Addendum describes a Freedom of Information Law (FOIL) request to the District dated June 19, 2019 for flow information from the pump station at 30 Forest Brook Road, and includes a copy of the District's response dated July 1, 2019 stating, "The requested information is not maintained by the agency."
  - a. Please be advised that Rockland County Sewer District No. 1 does not own or maintain the pump station at 30 Forest Brook Road.
2. Page 4 of Section I.II of the addendum states, "Additionally, the installed 24" interceptor that replaced the original 21" interceptor can provide a flow of 3.5 Million gallons per day to a new RCSD pump station at Forest Brook Road."
  - a. Please be advised that the 24-inch interceptor did not replace the 21-inch interceptor. Both interceptors are active.

- b. The reference to “a new RCSD pump station at Forest Brook Road” is false. We do not own or maintain the pump station.
3. The sanitary sewers from this project would connect to the District’s sewer system.
    - a. Upon review of this application, the District has determined that an impact fee is required, in accordance with Sections 502A and 1317 of the Rockland County *Sewer Use Law* as last amended in 2010.
    - b. Approval of the Comprehensive Plan amendment and the proposed zone change from R-15 to MR-12 to construct two hundred thirty-two (232) housing units and a 3,500 square foot community building for local convenience commercial use [with one (1) sewer unit] on thirty-eight (38) lots [formerly forty-one (41) lots] with a combined area of 27.6 acres will result in one hundred twenty-eight (128) additional sewer units. **Therefore, the applicant must submit a check in the amount of two hundred thirty-six thousand eight hundred dollars (\$236,800.00) payable to Rockland County Sewer District No. 1 within thirty (30) days of Planning Board approval.**
    - c. If the use or occupancy of the site exceeds two hundred thirty-three (233) units [e.g., if a 5-bedroom unit is subdivided into two (2) units; if any unit has an accessory apartment, a house of worship, a school, a daycare center, or a home occupation; or if the local convenience commercial use exceeds one (1) unit], the District will require further review and the owner will have to pay an additional impact fee.
    - d. We request that payment of the impact fee be made to the District before the structures are connected to the sewerage system.
    - e. We request that the Town Board notify the District upon approval of the Comprehensive Plan amendment and zone change.
  4. The District requires that the engineer perform a flow and capacity analysis of the sewer system before the District approves the connections to the sewerage system. If the flow from this project requires improvements to the District’s infrastructure, the applicant may be required to pay for an equivalent value of sewer improvements that is greater than the minimum impact fee stipulated above.
    - a. Page 3 of Section I.II of the addendum states, “Visual assessments were conducted during field observations to study the flow in the RCSD#1 Sanitary Manhole (SMH) on Brookvale Court.”
    - b. The addendum lists four dates – June 17, 21, 24 and 26 (2019) – on which observations were made at 9:00 AM and 5:00 PM.

- c. The addendum continues, "The study revealed that during all of the above-mentioned observations, the flow in the manhole is 4" + below the shelf or at less than half the pipe. This shows that there is adequate capacity in the pipe."
  - d. Please advise the engineer that we do not accept the conclusion that "there is adequate capacity in the pipe" based on eight (8) random visual assessments. The District requires a written report with a comprehensive, quantitative capacity analysis of the sewer system for maximum build out of the project area and the upstream drainage area *at peak hourly flow*.
  - e. Please advise the engineer that the District's design criteria for new sewers is that they run eighty percent (80%) full *at peak hourly flow*.
5. The proposed Comprehensive Plan amendments, zone change and Pascack Ridge project include Tax Lots 50.19-1-71 (formerly 15./215BB2), 57.07-1-2 (formerly 15./220B & 15./220A), 57.07-1-3 (formerly 15./221A), 57.07-1-4 (formerly 15./221B), 57.07-1-5 (formerly 15./224 and a portion of 15./226), 57.07-1-7 (formerly 15./228 and a portion of 15./226), 57.07-1-8 (formerly 15./230) and 57.07-1-8.1 (formerly 15./234), which the United States Environmental Protection Agency (EPA) has designated as Environmentally Sensitive Areas (ESAs).
- a. Prior to connecting any building to sanitary sewers, the developer must obtain a waiver of the EPA's grant condition, which restricts sewer connections from ESA lots. Any sewer application for these parcels cannot be approved until the EPA and New York State Department of Environmental Conservation (DEC) approve the waiver.
  - b. An ESA waiver request must be submitted to this office **along with the correct number of plans and narratives** as indicated below. The District cannot forward an ESA waiver request to the EPA and DEC until **four (4)** copies of the information outlined below are submitted to this office:
    - i. **PROJECT PLANS:** Please provide a detailed site plan of the existing and proposed topography, drainage, soils, etc., and other features of the site.
    - ii. **ESA BOUNDARY DELINEATION:** Please provide a precise delineation of the ESA boundary on the same scale as the aforementioned site plan. Also, provide a brief written report that delineates the boundaries of both the wetland and the 100-year flood plain boundaries.
    - iii. **EROSION AND SEDIMENTATION CONTROL (E&SC) PLANS:** Please provide a complete erosion and sediment control plan for the entire site to protect the ESA wetland and floodplain both during and after construction (include standard notes and details).

- iv. **ESA CHARACTERIZATION AND EVALUATION:** Please describe the current wetland features of the ESA wetland areas on the site in terms of the following parameters: acreage, flora, fauna, wildlife habitat, soils, rock, flood control, and the surrounding setting. Please also evaluate the wetland values in accordance with the latest available U.S. Army Corps of Engineers Wetland Evaluation Manual. Also, please quantify the floodplain characteristics and evaluate the effects of your project on it.
  - v. **EFFECTS OF MODIFICATIONS:** Please explain how the proposed site disturbances would affect the site features and values discussed in response to Item 4 above.
  - vi. **ESA MITIGATION:** Please provide a detailed narrative discussion of your proposed mitigation plan in order to comply with the standards for waiver approval listed below. As necessary, the plan should include the creation of new wetland acreage of, at a minimum, equal size and value to that which would be lost.
  - vii. **STANDARDS FOR WAIVER APPROVAL:** The standards applied by the EPA and DEC for ESA Waiver Approval are similar to the DEC standards for a Freshwater Wetland Permit. There will be a sufficient demonstration of:
    - (1) no net loss of wetland acreage or wetland values;
    - (2) no reasonable non-wetland alternate locations existing on the site for this development;
    - (3) minimization of loss of wetland and wetland values;
    - (4) mitigation of any loss of wetland acreage or wetland values;
    - (5) no appreciable increase in turbidity or sedimentation in the wetland or any watercourses above background levels; and
    - (6) no net increase in downstream flooding during storm events.
- c. *The Procedural Rules for Working on Rockland County Sewer District No. 1 Sewers* impose a fee of three hundred fifty dollars (\$350.00) to process an application for an ESA waiver.
  - d. Once the above requirements have been met, our office will forward the required information to the EPA and DEC. It should be noted that three (3) of the four (4) sets as requested above are required for EPA and DEC purposes.
6. The District owns and maintains 21-inch and 24-inch interceptor (“trunk”) sewers in two (2) easements through Tax Lots 50.19-1-46, 50.19-1-71, 50.19-1-72 and 57.07-1-2.
    - a. The proposed MR-12 zoning will require widening of existing easements that are less than twenty feet (20’) wide for the District to maintain the sewers.
    - b. No permanent structures shall be built within our easements.

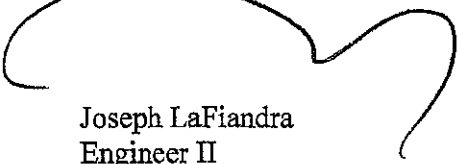
- c. For any structure on or near the easement boundary (e.g., the community building), the engineer will have to verify that the sewer main is not within the zone of influence of the proposed foundation. If it is, necessary design precautions must be done to protect the sewer.
  - d. If any foundation work or other types of major excavation work is to be done near to the easement boundary, we must be notified. Shoring or other types of precautions may be needed to protect the sewer main. A District permit will be required. The property owner must pay these expenses.
  - e. To prevent any damage from occurring to the existing mains, the District must be notified if any portion of the land within the easement is to be modified. This includes but is not limited to regrading and lowering or raising of manhole frames within the easement. Our office must approve any changes done within our easements, and any expenses must be borne by the property owner.
  - f. Contractors must obtain required insurance and sign a waiver to defend, indemnify, save and hold harmless both the **County of Rockland** and **Rockland County Sewer District No. 1** from any claims arising from work performed within our easements.
7. Details for sanitary sewer construction must comply with the District's construction standards and should be shown on the plans.
  8. All permits, fees and inspections associated with connections to the 21-inch and 24-inch interceptor sewers are the responsibility of the District. A permit must be obtained from the District prior to starting the sewerage portion of the job. This will require approval of the details for connecting to the existing sewers, submittal of the County Planning Information Certification, and all necessary insurance, bonds, indemnification and permit fees.
    - a. Please advise the applicant that all the District's requirements (e.g., payment of the impact fee, submittal and acceptance of the flow study, etc.) must be satisfied before we will approve the applications to connect to our sewers.
  9. Rockland County Sewer District No. 1 requires sanitary sewer construction to conform to District standards. This includes but is not limited to relative air, vacuum and deflection testing of mainline sewer and manhole construction. The District must receive and approve certification of test results from a licensed professional engineer before approving the sewers on this project.
  10. To reduce infiltration into the system, the District requires that the precast and doghouse sanitary manhole construction be in accordance with the District's standards. The District's standard details require the joints to have butyl rubber seals with *mortar in and out, and then to be coated with "Inft-shield" EPDM rubber seal wrap or approved equal.*

Mr. Dennis Lynch  
Page 6  
August 26, 2019

11. We request that submission to Rockland County Sewer District No. 1 of as-built drawings of the sanitary sewer extensions be made a condition of granting certificates of occupancy.
12. Rockland County Sewer District No. 1's "Commercial/Non-residential Wastewater Questionnaire" and the County Planning Information Certification must be submitted to and approved by this office for the local convenience commercial use. **The owner must sign the wastewater questionnaire.**
13. Details for the sanitary sewer extensions and the building connections are subject to approval by the Town of Ramapo.

Please inform us of all developments regarding this project and the proposed zone change. If you have any questions, please contact this office at 845-365-6111.

Very truly yours,



Joseph LaFiandra  
Engineer II

Attachments

cc: D. Philipps      M. Saber      M. Castro      D. Gregory      J. Roth  
Helen Kenny-Burrows – Rockland County Department of Planning  
Elizabeth Mello, P.E. – Rockland County Department of Health  
Christopher Kear – Rockland County Department of Fire & Emergency Services  
Shajan Thottakara, P.E. – Rockland County Drainage Agency  
Michael Sadowski, P.E. – Town of Ramapo DPW  
Christopher Wagner, P.E. – Town of Clarkstown Department of Engineering & Facilities Management  
Nikolaus Wirth – USEPA, 290 Broadway, 25<sup>th</sup> Floor, New York, NY 10007-1866  
Daniel Whitehead – NYSDEC, 21 South Putt Corners Road, New Paltz, NY 12561  
Charles Collishaw – 529 Route 303, Orangeburg, NY 10962  
Alex Goldberger – Monsey Lumber Co., 168 North Main Street, Spring Valley, NY 10977  
David M. Zigler, P.L.S.

File: TOR 50.19-1-44 et al. – Pascack Meadows  
TOR 50.19-1-72 – Collishaw  
Town of Ramapo – Zone Change  
ESA  
Impact Fees  
Reader



# Rockland County

Ed Day, Rockland County Executive

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## ROCKLAND COUNTY SEWER DISTRICT #1

4 Route 340

Orangeburg, New York 10962

Phone: (845) 365-6111 Fax: (845) 365-6686

RCSD@co.rockland.ny.us

**George Hoehmann**  
*Chairman*

**Dianne T. Philipps, P.E.**  
*Executive Director*

WASTEWATER DISCHARGE QUESTIONNAIRE FOR RESTAURANTS/CATERERS/BAKERIES/FOOD  
MANUFACTURERS/BARS/BANQUET HALLS/FOOD PACKAGERS/FOOD DISPENSERS FAST FOOD  
TAKE OUTS/CAFETERIAS AND ANYONE DISPENSING OR PREPARING FOOD ON LOCATION

Dear Sewer System User:

Federal and State regulations impose restrictions on the quality of wastewater being discharged into the Hudson River by Rockland County Sewer District No. 1.

In order to protect the environment and ensure that the receiving waters are protected from pollutants passing through the treatment facilities, the District administers a Pretreatment Program. This program is intended to protect the District's wastewater treatment facilities from damage and interference with its proper operation.

The Rockland County Health Department, municipal building, planning and environmental control departments may require comments from this office prior to action on your application. In accordance with the Pretreatment Program, you must complete the attached questionnaire (Form-CWO1) and return it to the Sewer District at the above address, along with the following:

1. A site plan showing the existing and/or proposed sewer line(s) in the street. The plan should also show the existing sewer connection or details for the proposed connection to the line in the street. The sewer elevations should also be clearly shown.
2. County Planning Information Certification form
3. A plumbing layout of the proposed facility, if available.
4. Details of any existing or proposed grease traps.
5. The Wastewater Questionnaire must be signed by a principle of the Corporation.

In all written correspondence please refer to the Tax Map Block and Lot number of the property, and the name and address of the project.

Your concern for the environment is greatly appreciated.

Should you have any questions or need additional information please call this office.

Very truly yours,

Joan Roth  
Compliance Administrator

ROCKLAND COUNTY SEWER DISTRICT NO. 1

(845) 365-6111

FAX (845) 365-6686

QUESTIONNAIRE TO BE FILED BY DISCHARGERS PREPARING/DISPENSING FOOD ON LOCATION (CW01)

Name of Project: \_\_\_\_\_

Address of Project: \_\_\_\_\_ Tax/Lot/Block No.: \_\_\_\_\_

Applicants' Name: \_\_\_\_\_ Telephone No.: \_\_\_\_\_

Owner of Property: \_\_\_\_\_ Telephone No.: \_\_\_\_\_

Name of Engineer/Architect: \_\_\_\_\_ Telephone No.: \_\_\_\_\_

Is this Facility:  An Addition  New  Existing  Change of Ownership

1. Will food be prepared at this location?  Yes  No

2. Will food be served at this location?  Yes  No On reusable plates  Yes  No

3. Is this a restaurant/cafeteria?  Yes  No

4. Is this a place of worship?  Yes  No If Yes, number of families \_\_\_\_\_

5. Does or will the facility have a fryer?  Yes  No

6. Does or will the facility have a grill?  Yes  No

7. Is there an existing grease trap at this location?  Yes  No

8. If yes to No. 7, then give details: \_\_\_\_\_

9. Does the facility have a 3-compartment sink?  Yes  No

10. The location of the sewer this facility is or will be discharging to: \_\_\_\_\_

11. The total seating capacity (excluding the bar): \_\_\_\_\_ Number of employees: Part time: \_\_\_\_\_ Full Time: \_\_\_\_\_

12. Does the facility have a bar?  Yes  No If yes, it's seating capacity: \_\_\_\_\_

13. Does the facility have a separate water meter?  Yes  No Gallons Per Day, Used or Expected: \_\_\_\_\_

14. Does the facility provide takeout food?  Yes  No If yes, % takeout: \_\_\_\_\_

15. Does this facility cater or provide to catering services?  Yes  No If yes, average meals per day: \_\_\_\_\_

16. Hours of operation for the kitchen: \_\_\_\_\_

17. For Banquet Halls, seating capacity: \_\_\_\_\_

Remarks, if any: \_\_\_\_\_

I certify under penalty of Law that I have personally examined and familiar with the information submitted herein and based on inquiry of those individuals immediately responsible for obtaining information, I believe the information above is true, accurate and complete. I am aware of the Rockland County Sewer Use Law as last amended in 2010 and that there are significant penalties for submitting false information.

Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Address: \_\_\_\_\_ Tel: \_\_\_\_\_



COUNTY PLANNING INFORMATION CERTIFICATION

Pursuant to Rockland County Executive Order No. 1 of 2017 applicants for County approvals for property development reviewed by the County's Commissioner of Planning, must make certain information and documents available to the County before the County will give its approval.

In the case of the present application before the Rockland County Sewer District No. 1 (RCSD No. 1) for [RCSD No. 1 Approval sought] \_\_\_\_\_

Property Owner(s) Address \_\_\_\_\_

Tax Map/Block/Lot \_\_\_\_\_

Check A, B, C, D or E. If B, C, D or E is selected, please ensure the proper documentation accompanies the Certification.

- A.  The matter was NOT the subject of review by the Rockland County Commissioner of Planning
- B.  The Rockland County Commissioner of Planning 'APPROVED' the proposal a copy of the Commissioner's report is attached to this Certification
- C.  The Rockland County Commissioner of Planning 'MODIFIED' or 'DISAPPROVED' the proposal and the Commissioner's report was NOT OVERRIDDEN by the local board
  - a. a copy of the Commissioner of Planning's report is attached to this Certification
  - b. a copy of the minutes of the local board adopting the Commissioner's report or failing to override the Commissioner's report are attached
- D.  The Rockland County Commissioner of Planning 'MODIFIED' or 'DISAPPROVED' the proposal and the Commissioner's report was OVERRIDDEN by the local board
  - a. a copy of the Commissioner of Planning's report is attached to this Certification
  - b. a certified copy of the minutes of the local board overriding the report of the County Commissioner of Planning, in whole or in part, are attached
  - c. a certified written copy of the local board's reasons for the override, as required by GML § 239-m and/or 239-n are attached to this certification.
- E.  I request that the requirement of this Certification be waived because:
  - a. The issues raised by the Commissioner of Planning are not relevant to the application sought. I have provided a copy of the Commissioner of Planning's review with this request; or
  - b. Other \_\_\_\_\_

[Dept use only: \_\_\_\_\_ granted; \_\_\_\_\_ denied]

*I, certify under the penalties for perjury, that I have reviewed this Certification, and that the information stated is true, correct and complete.*

Name of Applicant: \_\_\_\_\_  
(If applicant is a corporation please state the full corporate name)

Signature of Applicant: \_\_\_\_\_ Date: \_\_\_\_\_  
(Please note title of signatory if Applicant is a corporation)

Dear Mr. Lynch:

Attached please find an Acrobat file of the District's correspondence dated August 26, 2019 on the Pascack Ridge application and the Technical Addendum to Final Environmental Impact Statement.

Please confirm receipt. Thank you.

Yours truly,  
Joseph LaFiandra  
Engineer II  
Rockland County Sewer District No. 1

**Maureen Pehush**

---

**From:** Susan Shapiro <susan@hitoshapirolaw.com>  
**Sent:** Wednesday, August 28, 2019 1:57 PM  
**To:** Michael Specht; Michael Rossman; Yehuda Weissmandl; Brendel Logan; David Wanounou; Chris Sampson; Maureen Pehush  
**Cc:** Micheal Miller; ROSA 4 Rockland; Day, Ed; MillerA@co.rockland.ny.us; SchuetzD@co.rockland.ny.us; gordonwrenjr  
**Subject:** PASCACK RIDGE - ZONE CODE & COMP PLAN COMMENTS  
**Attachments:** PASCACK RIDGE -COMMENTS (8.28.19).pdf

Dear Supervisor and Town Board,

Please see attached letter regarding the above referenced matter.

Thank you,

—  
Susan H. Shapiro, Esq.  
75 North Middletown Road  
Nanuet, NY 10954  
Office: (845) 371-2100  
Cell: (845) 596-5403  
[susan@hitoshapirolaw.com](mailto:susan@hitoshapirolaw.com)

**Rockland Environmental Group LLC**  
75 North Middletown Road  
Nanuet, New York 10954  
(845) 371-2100  
[susan@hitoshapirolaw.com](mailto:susan@hitoshapirolaw.com)

August 26, 2019

Michael Specht, Supervisor Town of Ramapo  
Town Board  
237 Route 59  
Suffern, NY 10901  
via email:

RE: Pascack Ridge Zone Code Amendment and  
Comprehensive Plan Amendment

Dear Supervisor Specht and members of Town Board:

I am writing today on behalf of CUPON Hillcrest and ROSA for Rockland, Inc., to request an extension for written public comments. As of today the Town cannot provide the Rockland County GML or the list of exhibits and exhibits for the public hearing.

I am requesting that September 3, 2019 deadline for written public comments be extended until two weeks following receipt the GML and the list of exhibits to afford the public to obtain them under FOAI and incorporate them into their comments.

The Rockland County GML review of these actions is not due until September 4, 2019. Assuming the Town can provide the public with the list of exhibits by the September 4, 2019 we are requesting that written public comments be accepted until September 18, 2019.

At the public hearing on August 15, 2019 the land use attorney representing the Town Board, George Lithcow affirmed that there were 24 exhibits that are part of the public hearing. Mr. Lithcow said he would not read the exhibits into the record, (which was inappropriate as it denied the public knowledge of what the Town was even considering) but he committed to providing the public the exhibit list and the exhibits the next day.

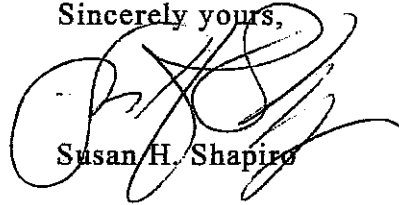
Now today, Tuesday August 26, 2019, six days after Deborah Munitz of ROSA submitted a FOIA to request for these documents, Alan Berman confirmed today that the Town still does not have a complete list of the

exhibits, nor does the Town know which exhibits were referenced by the Town's new attorney.

Clearly, it impossible for the public to submit comments without the necessary documentation, and it is blatantly inequitable to close public comments on September 3, 2019, prior to public access to the missing exhibits and the GML review.

Therefore, we are respectfully requesting that the deadline for public comments be extended until September 18, 2019.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Susan H. Shapiro', written over the typed name below.

Susan H. Shapiro


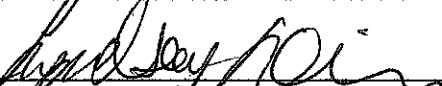
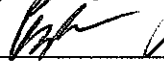

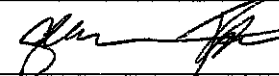



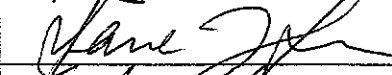




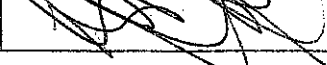
cc: Ed Day, County Executive  
Arlene Miller  
Doug Schutz

# Pascack Ridge Zone Change

We, the undersigned are **OPPOSED TO A ZONE CHANGE** for the Pascack Ridge developer. Building 200+ units on less than 30 acres is **NOT** appropriate for this site. Homes in the area are on lots less than one acre and zoned properly. We travel this area daily going to and from work. More traffic will cause even more concern. We must consider safety of the children and those walking. More cars, additional school busses, company/business vehicles and pedestrians walking are some of our concerns. Many of these streets have curves with short sight areas. We are also concerned about how changing weather conditions will affect this proposed development. Heavy snow, snow plows, heavy rain, drainage of water will have an impact on this community.

This proposed change would affect The Village of Spring Valley, Town of Ramapo and Town of Clarkstown.

Respectfully submitted on August 24, 2019.

Name (print)	Signature	Address
Ahmed mabarez		7 homer Lee Ave Spring valley Ny 10977
Lindsay DeMorin		34 Williams Ave Spring Valley NY 10994
Kyle Blair		16 north cole ave Spring Valley NY 10977
Kenny Blair		16 North Cole Ave SV
Senelia Henry		16 NORTH Cole Ave S
Sophia Dimpion		153 Lafayette ave Suffern NY 1090
Kesner ST		244 North main st 190
Louise ST		244 North Main St S
MARIE DEMORIN		34 Williams Ave Spring Valley
FRITENER DEMORIN		34 Williams Ave SV
Kordell Demorin		34 Williams Ave SV
Ryan Rodrigues		2 Stephen Pl. S.V. NY 10977
Karl Lopez		200 N. main street Spring Valley
Doris Lopez		200 N. main street Spring Valley

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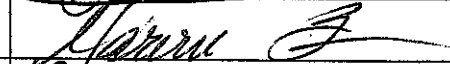
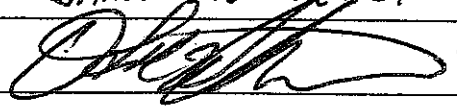
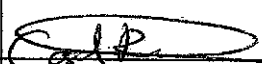

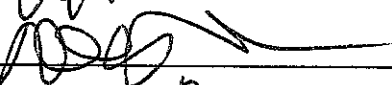
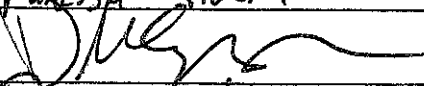
Name (print)	Signature	Address
ELSA ATKINS	Elsa Atkins	
Jacquelyn McMillion	Jacquelyn McMillion	48 Spring Valley Commons Rd
VINCENT SHER	Vincent Sher	21 Summit Ave, Spring Valley
Onar Thomas	Onar Thomas	
Don Danizi	Don Danizi	94 N main st
Jeremy Cury	Jeremy Cury	17 51st ave
Jan Aleks	Jan Aleks	
ARISE VANDORIK	ARISE VANDORIK	
Uendjessip R. Runko	Uendjessip R. Runko	32 Division
Flureco P. Lewis	Flureco P. Lewis	
Danielle Fields	Danielle Fields	39 Grandline
Steve Raymond	Steve Raymond	Summit Ave
Eduardo Guerrero	Eduardo Guerrero	
Tony Gonzalez	Tony G	

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This proposed change would affect The Village of Spring Valley, Town of Ramapo and Town of Clarkstown.

Respectfully submitted on August 26, 2019.

Name (print)	Signature	Address
Antoinette Thaxton		24 South Street, Haworth, NJ
Jenny Weaver		15 Park Ave apt C202
MARVIN JILES		9 Brevoort Dr.
JAMES NORFLEET	Jane Nguyen	<del>Carl Fene</del>
	ODEL Williams	
Carl Bamber		SVC
Cristen Price	Cristen Price	Belthure H.
Karelys Candelano		11 Drexel Ct. New Hope
Randy Toribio		11 DREXEL Court N.C. NJ
Vanessa Rivera	Vanessa Rivera	11 DREXEL Ct, N.C., NJ
Derek Mehu		6 Hempstead Rd.
Davone O'Neal	Davone O'Neal	18 Columbus Ave.
Keanna Deshields	Keanna Deshields	7 Laura Place.
Nika Vel Biondo	Nika Vel Biondo	7 Sherri Lane S.U.

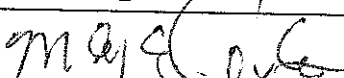


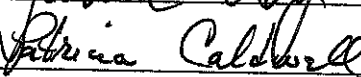

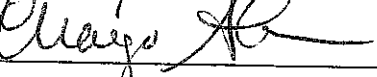


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This proposed change would affect The Village of Spring Valley, Town of Ramapo and Town of Clarkstown. **Please vote NO to this proposed zone change.**

Respectfully submitted on August 30, 2019.

Name (print)	Signature	Address
MARYEALston		252 NO HIGHWAY ST SPRING VALLEY NY
NICOLE R. ABRAHAM		126 Bethune Blvd Spring Valley NY 10977
JEROME CLAY		5119 BELLEVUE ST SPRING VALLEY NY
PATRICIA CALDWELL		248 N. MAIN ST. Spring Valley N.Y. 10977
Craig W Gathers		24 Twin Ave B-4 Spring Valley, N.Y. 10977
Margo Abraham		126 Bethune Blvd Spring Valley NY 10977



# Rockland County

HEALTH

**CENTER FOR ENVIRONMENTAL HEALTH**

Dr. Robert L. Yeager Health Center  
50 Sanatorium Road, Building D  
Pomona, New York 10970  
Phone: (845) 364-2608 Fax: (845) 364-2025



**Public Health**  
Prevent. Promote. Protect.

**EDWIN J. DAY**  
*County Executive*

**PATRICIA S. RUPPERT, DO, MPH, CPE, DABFM, FAAFP**  
*Commissioner of Health*

**SAMUEL RULLI, PE**  
*Director, Environmental Health*  
19 AUG 30 PM 1:19

August 27, 2019

Town of Ramapo Town Board  
237 Route 59  
Suffern, NY 10901

Re: Pascack Ridge Comprehensive Plan Amendment and Zone Change  
Technical Addendum to the Final Environmental Impact Statement  
Tax Lot 50.19-1-44 to 53, 50-49-1-55 to 72, 57.07-1-2 to 5, 57.07-1-7, 8, 8.1, 9, 10, 19

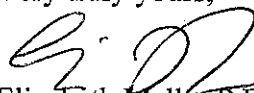
Dear Board Members,

Our office is in receipt of a Technical Addendum to the Final Environmental Impact Statement (FEIS) for the above reference project, with a cover letter dated July 9, 2019, prepared by Zarin & Steinmetz. Our comments are as follow:

1. Our office and the Rockland County Sewer District No. 1 have independently requested a sanitary sewer capacity analysis. This comment has not been adequately addressed in the Environmental Impact Statement. Note that at the time of submission of a Sewer Main Extension application, the requested sanitary sewer capacity analysis will be required.

If you have any questions regarding this matter, do not hesitate to call.

Very truly yours,



Elizabeth Mello, P.E.  
Senior Public Health Engineer  
(845) 364-2616

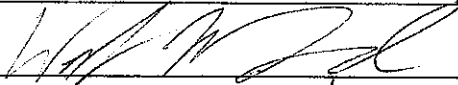
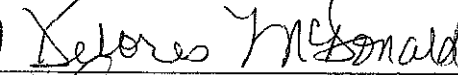
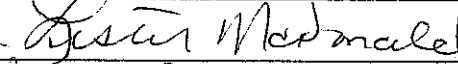
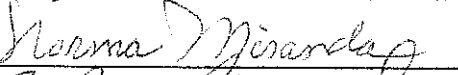
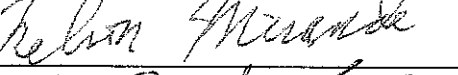


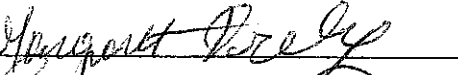

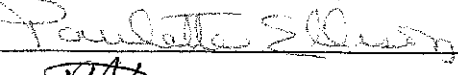
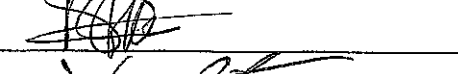

cc: Arlene Miller, RC Planning  
Joe LaFiandra, RCSD #1  
Mike Sadowski, P.E., Town of Ramapo  
Atzl, Nasher & Zigler, PC

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This proposed change would affect The Village of Spring Valley, Town of Ramapo and Town of Clarkstown. **Please vote NO to this proposed zone change.**

Respectfully submitted on August 20, 2019.

Name (print)	Signature	Address
Wesley McDonald		16 Andover rd, Spring Valley, NY 10977
Delores McDonald		16 Andover Rd Sp. Valley N.Y.
Lester McDonald		16 Andover Rd SV
NORMA MIRANDA		2 MERRICK LANE SPRING VALLEY NY 10977
Nelson MIRANDA		2 MERRICK LANE SPRING VALLEY NY 10977
Jordan Gaspard		18 Andover rd. Spring Valley, N.Y 10977
Pierre Gaspard		18 Andover Rd Spring Valley, N.Y 10977
M. D'Arcy		87 West Clarkstown Rd
Robert L. Ellison		17 Danville Rd. Spring Valley, N.Y. 10977
Paulette Ellison		17 Danville Rd Spring Valley 10977
Ronna Stokes		6 Andover Road Spring Valley, NY 10977
Kennard Stokes		6 Andover Road Spring Valley NY 10977