



To: Mayor Rogers

From: David Gilmour, AICP, Municipal Planner

Date: August 22, 2016

RE: Suggestion to Achieve Coherent Environmental Review Documentation for Trans-Hudson Management Corp's Proposal at Northeast Corner of NYS Rte. 299 & North Putt Corners Road (SBL 86.12-4-5.1 - 5.68 Acre Site in Town B-2 & I-1 Zones)

This memo outlines certain Village interests with regards to development review planning underway outside the Village, presenting rationale for an inquiry and commentary to the Town of Planning Board (Lead Agency), as to whether it has sufficient information to proceed with SEQRA processing and an evaluation of the potential for impacts to arise from the development proposal referenced above. Generally, comments outline a request for clarifications, explaining why these are considered important. Commentary takes-off from an August 2015 joint letter between the Village Board and Historic Huguenot Street, Inc., which emphasized the interest in preserving and enhancing community character and aesthetics during development. A focus now is whether and how the applicant's proposal to urbanize this location will impact transportation, watershed resources and ultimately aesthetics. In generating comments, I scanned 20 documents on the Town's 'Current Projects Under Review' web page.

Development Intensity - The applicant proposes an on-site sanitary septic system versus requesting to join the adjacent sewer district and access sanitary sewers. The project appears headed towards 35% impervious surface coverage and extensive grading. Consistent with Putt Corners Road Corridor Development Plan (1995) and Mill Brook Preserve Management Plan (2014), hereafter MBPMP, it seems like there could be analysis to evaluate and compare development impacts, including under a scenario with sanitary sewer service.

Specifically, can there be evaluation into how a sewer connection could relate to:

- Alteration of topography and balance of fill;
- On-site Stormwater management; and
- Density, character and arrangement of development at this location?

Although there is no specific reference to MBPMP in the SWPPP posted for this project, page 37, paraphrased, of MBPMP identifies that prior to development, there should be:

- Exploration of the amount of impervious cover and where development of impervious cover takes place;
- Evaluation of land use management techniques;
- How to maintain the integrity of upland habitats (including as implied, within 1st order streams – see page 27); as well as,
- What clearing and grading should take place during development, as well as how to effect long-term maintenance and management after development.

Village of New Paltz Suggestions on Environmental Review of Trans-Hudson Management's Proposal at NYS Rte. 299 & North Putt Corners Road

MBPMP, #4, page 38, implies that the above types of assessments should occur during major development review process. Town Planning Board is encouraged to determine whether this is a 'major development' considering project location and total developable lands within the northern part of the corridor and whether types of analysis called for have been performed.

Town Planning Board is urged to have the applicants concisely distill and summarize alternative approaches, impacts contemplated, and mitigation proposed up to this point. This could help inform whether there should be a more comprehensive assessment of these factors through an enhanced SEQRA Long Form, or generation of a concise Environmental Impact Statement (EIS).

If carefully organized, an EIS could provide a coherent way to analyze and compare alternatives and associated impacts systematically. As currently presented, it is difficult to understand how water quality within Mill Brook Preserve and its tributaries could be impacted by this project, and whether resources could be susceptible to adverse impacts based on Trans Hudson's current program. Consistent with MBPMP and the 2006 Open Space Plan, analysis could evaluate feasibility to achieve natural design and cluster type development, Better Site Design, and higher density on part of the location so there can be greater open space and preservation of natural features.

It seems like retaining a higher portion of open space and natural features could contribute to sustained community character and resilience. Likewise, as discussed below, the Village questions whether the proponents have comprehensively evaluated impacts of a full-buildout of the site on multimodal transport, and whether a proposed easement adjacent to the street and building a sidewalk on a part of the frontage is sufficient in terms of retaining and enhancing character, quality designs, and addressing future needs in terms of drainage and multimodal transport? The 2011 Walkkill Valley Rail Trail and Hudson Valley Rail Trail Link Feasibility Study (Link Study), prepared for Southern Ulster Alliance, page 41, calls for an off-road 12 foot wide asphalt shared use path, with 2-foot landscaping on either side, plus guiderails, extending from the intersection of Henry W. Dubois Drive to NYS Route 299 (p 48). In comparison, it is not apparent why the applicant proposes a more limited easement. It is also questioned whether they presented engineering evaluation of potential to build this facility in frontage, the cost for that, and explanation why they are not building that now?

Transportation – The applicant analyzes motorized transport and there are comments on non-motorized transport needs; yet, it is unclear whether there is adequate assessment of impacts, and proposed mitigation, particularly with respect to lower Main Street, and the Henry W. Dubois and North Putt Road corridors, as well as whether the development helps achieve a sufficient blending of non-motorized and motorized transport. Again, the Village questions whether there is a need for a concise summary of impacts versus mitigation which the Town Planning Board can use to fully assess the merits of this application?

One request for analysis is the impact on the Main Street and Manheim Boulevard intersection. Since Main Street is key for pedestrian service, this could include analysis of how pedestrian level of service there may be impacted under a future build condition.

Village of New Paltz Suggestions on Environmental Review of Trans-Hudson Management's Proposal at NYS Rte. 299 & North Putt Corners Road

The Town is also requested to consider whether there is coherent analysis of alternative approaches to achieving non-motorized access and connectivity within the North Putt corridor and at the intersection with Henry W. Dubois Drive, including given the proposed access/egress arrangement from Trans Hudson's property, a proposal for implementing a major bikeway in this corridor, and the potential development of an enhanced Critical Facility at the northwest corner of the intersection just beyond Trans Hudson's property?

The Village and Town are actively coordinating under the Governor's Office of Storm Recovery's New York Rising Program to explore the probable cost and feasibility to establish enhanced emergency operations at the publicly-owned property at North Putt Corners Road and Henry W. Dubois Drive. The March 2014 Ulster Communities New York Rising Community Reconstruction Plan presents a project estimated at \$5 million. There is now a notion to consolidate west of Wallkill fire and/or emergency operations by moving fire apparatus from Plattekill Avenue to there, and possibly structure other public safety enhancements, such as by adding an emergency shelter and/or command center. Given this potential, should the applicant be requested to analyze how traffic specifically attributable to its project could impact the intersection and alternative access/ egress configurations for emergency vehicles along the frontage of the publicly owned property? Such analysis could consider possible needs for signalization and traffic control, including since a major bikeway is also planned there.

Moreover, since a bikeway is proposed to connect from Main Street to Henry W. Dubois, it would be beneficial to understand how multimodal operations would specifically be structured in this area, including based on traffic generated from full-buildout of Trans Hudson's property. A concise narrative and summary table can explore impacts to define how the applicant considered guidelines in the Link Study, and whether, how and why they depart from them.

It seems like the applicant does not consider how the mix of trips at this site and within this area could change given that a regional bikeway is planned for development in and by this location. The Town Planning Board should consider the potential need to assess detailed alternative specifications for building-out the bikeway (not just achieving a limited sidewalk within a portion of the North Putt frontage). As noted, the Village questions whether the Planning Board has enough information, and structured analysis, in order to assess the character and fit of this project with the North Putt Corridor transportation environment as it exists and is planned for development.

Conclusion – The Village of New Paltz stands ready to elaborate on these interests. The Town is urged to consider ordering a more thorough environmental review.