

Plaintiff Comparison of July 14, 2009 to October 15, 2009

MEMORANDUM

To: Michael Klein -Town Attorney

Date: ~~July 14~~October 15, 2009

Subject: Patrick Farms DEIS Review -~~Draft~~Final Review Comments ~~for Review~~:

~~Site Plan~~General Review Comments:

It is acknowledged that the proposed layout is a conceptual plan for a zone change and is not intended for site plan review. It will be subject to full subdivision and site plan review by the planning board ~~at which time alternative layouts should be provided.~~

~~The site plan calculates deductions on a lot by lot basis instead of on an overall basis. This makes it more difficult to judge the true density of development and impacts of development.~~

- ~~• There is no overall calculation of deductions. The applicant should define deductions on a site wide basis and by zoning district acreage including:-~~
 - ~~○ Wetlands and wetland buffers~~
 - ~~○ Water bodies—streams, ponds, lakes, and required buffers~~
 - ~~○ Steep slopes~~
 - ~~○ Floodplains and floodplain buffers~~
 - ~~○ Overhead Utility Rights of Way~~
 - ~~○ Underground Utility Rights of Way and development restrictions~~
 - ~~○ Total Acreage of land parcels~~
 - ~~○ Total Acreage of developable land by zoning category~~

~~Under the requirements to identify deductions, the original 206 acres figure will be reduced, thus increasing the overall density of development. The goal is to calculate the usable acreage overall as the standard to measure the impacts of the rezoning.~~

~~The calculation of the developable land area should be based upon the requirements of Section 376-42—Special Bulk Requirements.~~

~~A. As part of any minimum lot area requirement of this chapter for all uses, not more than fifty percent of any land underwater, subject to or within the one hundred year frequency floodplain, wetlands, within easements or rights of way for overhead utilities, with slopes (unexcavated) of over twenty five percent or within a designated street line of any road shall be counted towards meeting the minimum lot area. In addition, at least fifty percent of the minimum lot area requirement shall consist of land without the above listed impediments. The application of this section to any particular lot shall be the responsibility of the Town Planning Board at the time of subdivision or site development plan approval. The significance of this is that the density proposed must be measured against the net land total to determine actual density.~~

~~It is noted that the area west of Route 202 is used to add to the land area for the density calculation even though it is not contiguous to the property on the east side of Route 202. In addition, the entire Pond area is included within the multi-family zone to add additional land area for the calculation of the overall density of the multifamily zone.~~

~~Discussions with LJA personnel indicated that the deductions were completed on a lot by lot basis and most of the deductions were found on the site plans for the alternatives. Deductions serve two purposes. First, the deductions are used to calculate the useable area of the entire parcel which is then used to determine an appropriate number of units based upon the zoning or proposed zoning. Since the proposal seeks to create several "new" zones, the overall deduction calculation may have to be recalculated for the individual zones. However, since the property is currently wholly contained within two residential districts, the developable area should be based upon the usable area left after deductions. This provides the basis to assess the environmental impacts of the change to the new zone(s).~~

~~The full size drawings do not show the required bulk table for the proposal.~~

~~The following comments are offered:-~~

General

~~Why not~~ The Patrick Farm development (the proposed action), would consist of 497 residential units including 87 single family homes, and 410 multifamily homes composed of 314 market rate townhouse units, 72 workforce condominium flats and 24 rental apartments which would be set aside for community service workers. The project sponsor's intention is to address a need for an increase in the diversity of the housing options in the Town and in the metropolitan region. The project sponsor believes this project addresses the need for multifamily dwellings in an area where the supply is limited.

The proposed action would include a map change to re-zone a portion of the site (approximately 61.3 acres) from R-40 to MR-8. The single family component would remain in the R-40 zone. The project was designed with the single family component set around the perimeter of the site to reflect the character of the existing nearby neighborhoods, while the multifamily housing would be located in the center portion of the site. The perimeter of the site would be landscaped with a mixture of deciduous and evergreen trees to screen the residential development from adjoining properties and roads. Native vegetation is proposed for landscaping plantings wherever practical. Existing vegetation is proposed to be retained around most of the perimeter and in areas of the interior of the site including wooded wetland and stream corridor areas.

The project site is located east of US Route 202 and west of NYS Route 306, in the Town of Ramapo. The project site has direct access to US Route 202 and NYS Route 306. US Route 202 is a major east/west route and provides direct access to the Palisades Interstate Parkway less than 2 miles from the project site. NYS Route 306 is a major north/south route from Route 202 to Route 59 in Monsey. Access to the major interstate Route 87/287 is via the Palisades Interstate Parkway.

This is a Town Board action. The action includes assessment of the potential impacts of this development for the sake of evaluating the request for rezoning of the property and the proposed zoning map amendments in addition to revision of the Town's 2004 Comprehensive Plan as it relates to the Patrick Farm property.

This review focuses on the environmental impacts of the project and comments on the site plan review will be limited to site plan issues that address environmental concerns.

General Comments:

- ~~1.—The Comprehensive Plan recommended clustering for this parcel. Is there a way to cluster to preserve some additional open space on the single family homes? ~~The Comprehensive Plan recommended clustering for this parcel).~~~~
- ~~2.1. A single map of all deductions should be prepared.~~
- ~~3.—Cut and fill figure 3.1-7 shows that most of the site is either cut or fill. It is noted that ~~a golf course proposal was turned down for this site, and that~~ the DEIS/DEIS notes the sensitive nature of the site with streams, ponds and wetlands. ~~With that background, it~~ It would appear that the design for the site should follow the contours — stepping up or down slopes as appropriate instead of such substantial grading. ~~There is little need to clear and grade as much land as is proposed.~~ This is a major impact that ~~could be avoided. Clear cutting of the multifamily zone is what results and the impacts are thus severe instead of mitigable.~~ can be mitigated. Please demonstrate why designs with less cut and fill could not be utilized.-~~
- ~~4.—There is no tree survey to demonstrate the impacts to the existing forested areas as required by the Town's subdivision and site plan regulations. The document identifies the types of vegetation by area, but it would not be possible to determine the impacts of the proposal by the number of mature trees to be removed or preserved. This is a standard measure of impact for new development proposals and the applicant should provide this.~~

Site Plan Comments:-

- ~~•—No clear deductions for ponds and streams-~~
- ~~•—Too many lots do not appear to meet requirements (-~~
- ~~•—Private roads are not acceptable-~~
- ~~•—Long lines of parking in front of residences are not acceptable in rural setting-~~
- ~~•—Straight roads are too repetitive and restrictive, lacking in design opportunities and limiting design alternatives. Roads should mimic the landscape.~~
- ~~•—Too many cul de sacs are requested; they do not meet Town cul de sac regulations.-~~
- ~~•—Multifamily units do not meet fire code requirements for maximum hose length.-~~
- ~~•2. Perpendicular parking on both sides of a street presents traffic hazards and focus on cars instead of the homes as the key element.~~

Land Use Comments:

The applicant indicates that the proposed use fits into the character of the neighborhood, ~~but does not provide backup.~~ Additional background information should be provided to support this contention.

Infrastructure:

1. Water ~~the applicant should show the Rockland County Department of Health of Health~~ water status. Does the website show sufficient water for this development in its allowable capacity?
2. Sewer ~~-~~please show map of required improvements for Pump Stations and force mains

Visual:-

- ~~1.~~ There are visual impacts associated with the design as proposed. The private roads and buildings are aligned with long double sided perpendicular parking spaces. This ~~is imposing a suburban~~proposed garden apartment style design ~~on an environmentally sensitive~~would be partially visible from the site's proposed single family neighborhood. ~~That design is old and tired and should not be used for a new development. Applicant should~~Route 202. Although this would mostly affect the interior site aesthetic, it may also be visible from outside the site. The applicant may wish to consider alternate layouts. The visuals shown depict revising parking areas where practicable. The visualizations show large trees surrounding the multifamily ~~units, while the text indicates dwellings where the site planning maps show that the multi-family area will be clear cut with~~no these trees ~~remaining.~~
- ~~2.1.~~ Clearing much of the center of the site opens new view sheds across the site from the east to west. These new view sheds are not aptly depictedhave been removed.
- ~~3.2.~~ Blasting as noted on top of high points should be avoided as should any destruction of the ridgeline. The ridgeline should be treated sensitively and avoided where possible. It is noted that the Applicant has included project modifications to preserve the top of the ridgeline and that the rest of the ridge in the southwest portion of the site remains undisturbed.
- ~~4.3.~~ The visual impacts ~~have not been adequately~~were assessed in terms of the Scenic Roads District restrictions as required, ~~and it is not likely that approvals.~~ Approvals for ~~the intensity of any~~ impacts to ~~these areas~~this area would be ~~approved without modifications and mitigations. Mitigation has been proposed by doubling the setbacks along Route 202. The 1000 foot subject to approval during the site review limit however was not evaluated as the setbacks are the primary tool available.~~process. Existing stone walls and fences ~~will be~~have been preserved where feasible, again subject to site plan review.
- ~~5.4.~~ The photographs shown of the site from the Scenic Overlooks in Palisades Park ~~do not~~should show more clearly the impact of removing 60 acres of trees. The image renderings of the views did not appear to show the large cleared areas that will result from the project. ~~The post development imagery requires a more realistic view determination.~~ Some simulation work was completed from the Scenic Overlooks, ~~but no visual impacts were identified.~~ Once the multifamily buildings are constructed and that portion of the site is cleared, ~~it is virtually impossible not to notice~~ a clearing of 60 acres as proposed may be visible.
- ~~6.~~ ~~There is no clear overall aerial photograph of the site within the document to assist in~~

~~determining visual and other impacts.~~

5. Internal visuals ~~not~~ were provided ~~nor~~ assessed; ~~Large and long parking~~ which do not appear to adequately assess the loss of mature trees as planned. Significant plantings including large and diverse trees will be required.

7.6. Although a number of cross sections are provided showing site lines from outside the site additional illustrations of internal views should be needed for this aspect of visual assessment. ~~Large and long parking~~ lots with residences behind are not in keeping with the character of the area. ~~Character of the area will be a significant impact both in terms of density and visual impacts. Again no trees will remain in the multifamily zoning area if the project is approved as proposed. The concept of sheltering the multifamily units in the center will not work if all of the trees have been removed~~The cross sections should show the view planes more clearly. Vertical differentiation will help to soften the geometry thus reducing the visual impact.

8. ~~Cross Sections don't seem to show the view planes properly; there is too little vertical differentiation.~~

9. ~~It is acknowledged that alternative designs were not part of the scope, but the sensitive nature of the site calls for discussion of alternative designs with lower impacts at the time of Planning Board Review. The visual impacts could be significantly reduced if the multifamily zone was not clear cut. Keeping trees around the buildings mitigate impacts to the views. The trees are generally 60 feet tall which would permit taller buildings that would significantly increase open space resources while minimizing the need to clear. Taller buildings would be especially useful where there are no garages as parking could also be clustered.~~

7. Applicant should consider alternate layouts for stepped building designs in an effort to preserve mature trees and minimize impacts to slopes.

Site Circulation:

The comprehensive plan addressed key circulation issues facing the Town of Ramapo including the unnecessary endings of streets with and without cul-de-sacs. Road connections should be completed and cul-de-sacs should be proposed only where no other solution was available. This plan has five cul-de-sacs, ~~four of which (if not five), are not necessary. The rationale for this policy recommendation is that Police and Emergency response teams need to respond in a timely manner, and to provide secondary means of access that cul-de-sacs do not offer. In addition, the subdivision regulations and site plan regulations limit cul-de-sacs to a length of 500 feet in R-40 zones. The cul-de-sacs proposed are generally 1200 feet in length. Hence the cul-de-sacs should be eliminated or reduced to the minimum required~~two of which are designed to avoid the on-site wetlands and two which are designed to preserve the ridgeline.

Drainage:

The drainage system has been designed in accordance with standard engineering practices. What is missing is a less structural design which would seek to provide a series of water amenities which reflect the sensitive nature of this site. These amenities could be fed with non-structural systems such as rain gardens and underground storage tanks to provide waters for other uses. The basins as proposed do not provide an amenity to enhance the site. They have been designed as a

standard add-on which provides a facility for detention instead of designing the detention into the site in a series of visually appealing amenities. It is not that the design is not correct, but that detention could be I used as a design feature to supplement the visual environment instead of simply providing an engineered basin for detention. This site offers the capacity for more sensitive treatment of stormwaters which would contribute to the more sensitive design of the overall proposal. Although noted later, there is an opportunity to recoup the energy of the streams to offset the energy consumption of the development. There is an opportunity to enhance the sustainability of the development.

Scenic Roads Local Law: The Scenic Roads district boundary should be shown on all site plans to identify impacts and to guide the site plan. ~~It is estimated that 60-70% of the site is subject to the provisions of the scenic roads ordinance, yet there is little more than mention of it in the text. Full compliance with the provisions could impact 70% of the site.~~ As mentioned earlier, the response to the Scenic Roads provision was limited to doubling of the setback requirements along Route 202, ~~but without any.~~ The applicant should provide additional internal impacts mitigating measures.

~~The full size drawings should depict the Scenic Roads Local Law boundary. The key map does not depict the Scenic Roads Local Law boundary.~~

Housing Diversity: In terms of diversity of housing, providing the isolated site for ~~affordable~~ workforce housing is not the preferred way to provide more affordable components. Providing ~~the affordable~~ lower cost units within a mix of townhouse units including 1, 2, 3 and 4 bedroom communities would be the most effective way to contribute to housing diversity. Inclusion of ~~affordable~~ workforce housing alternatives within the primary development area is the preferred method.

Sustainability: The ~~scope of work~~ scoping outline requires an assessment of the sustainability of the proposed development. The work required for this part should include the descriptions of the efforts made to reduce the energy demands of the proposed development. ~~The descriptions given were minimal references which need to be expanded significantly.~~ The provision of wind power, solar power or hydro generation efforts should be considered as well as solar hot water heating and geothermal alternatives. The pending SEQR draft recommendations discuss the need to consider these issues.

For example, the first way to reduce the energy footprint of the development is to minimize the size of the individual structures. ~~All of the structures in the proposal would be considered large with the possible exception of the affordable units. Hence the energy consumption of the proposal would be significantly larger than expected. With a larger than expected energy footprint, mitigating efforts would be required to provide a more balanced development. No mitigating efforts were mentioned.~~ According to the DEIS initial submission, the smallest townhouse is 3,348 square feet while the largest ~~is was~~ 3525 square feet. ~~These are considerably above the standard 2000 square foot four bedroom home or townhouse. Either the size of these units should be reduced, or effective mitigation for the additional energy costs should be considered.~~ Revisions to the DEIS indicate a reduction in the size of ~~most units to approximately 3000 square feet for~~ the market rate townhouses to approximately 3000 square feet and a reduction to 1800 square feet for ~~the "affordable"~~ other units.

The energy consumption /sustainable factors to be evaluated should include:

- Additional insulation and energy efficiency
- Smaller footprints and buildings
- Energy producing or reducing techniques (No wind power, solar power or /wind/hydro-generation efforts have been proposed or contemplated. No)
- Water re-use; Water saving devices; water heating efficiencies (solar or instant hot water heating was addressed; no systems

The applicant has proposed supplemental solar hot water in the multifamily units and consideration of geothermal alternatives were addressed. These are items that SEQR has required in the revised SEQR draft regulations heating and cooling in the 24 rental apartments.

The Town has set the tone for these efforts within its own buildings including solar electric for the Town Hall and geothermal heating and cooling of the new public works building. ~~The new SEQR standards proposed (but not yet adopted) include detailed sustainability reviews that this proposal would not meet.~~

Design Sensitivity:

The design of the project should be refined to the extent practicable to more closely reflect the sensitive nature of the land of Patrick Farms capitalizing on the ~~site's~~ natural assets and overcoming its liabilities. The assets of this site to focus the design on are:

- Water features including ponds, streams and wetlands
- Slope changes and elevation changes and ridgelines
- Significant forested areas
- Natural vistas
- Archaeological assets

The liabilities that must be overcome are:

- High pressure gas main
- Overhead utility lines
- Slopes in excess of 25%

~~The way to create a sensitive design is fairly straightforward. Respect the land and have the development reflect the land following Ian McHarg's "Design with Nature" concepts. These concepts are similar to a medical doctor's mandate, first do no harm!~~

~~A "sensitive design" would:-~~

- ~~Save as many trees as possible to minimize changes to the ecology of the site~~
- ~~Build "with" slopes not against them~~
- ~~Have roads follow contours instead of crossing them~~
- ~~Minimize cut and fill to the maximum possible~~
- ~~Incorporate a design featuring water features~~

- ~~Design for maximum solar implementation (passive and active)~~
- ~~Minimizing any slope changes~~
- ~~Avoiding all areas of 25% slope or more~~
- ~~Minimizing impacts to 15-25% slopes~~
- ~~Utilize natural drainage to the maximum extent feature water amenities throughout instead of creating detention facilities near low-lying areas~~
- ~~Use non-structural drainage solutions to minimize the need for extensive piping and drainage systems~~
- ~~Design to place wetlands and other natural resources under common homeowner association control~~
- ~~Incorporate accepted design practices to provide design closure of curved and looped streets for both aesthetics and safety. Curved streets automatically calm traffic and looped streets provide two means of ingress and egress for emergency vehicles~~
- ~~Provide maximum design articulation of buildings avoiding flat or sides without architectural treatments~~
- ~~Building entrances can be varied to include side entrances for end units which lead to more imaginative presentations~~
- ~~Vary the designs of facades for interesting architecture~~
- ~~Provide a multitude of building options to avoid overly repetitive building elevations~~
- ~~"Fit" the design of the buildings to the site taking advantage of the opportunities that changes in slope offer. Step-down hill buildings down the slopes with exposed basement entrances at the lower levels. Step buildings up the slopes providing garages on the ground level and raising the main floors to mimic the upslope~~
- ~~Reflect the needs of the local climate in the building designs keeping automobiles out of sight and in garages for cold weather access~~
- ~~Provide short driveways instead of parking lot implementations to facilitate effective design and non-structural stormwater solutions~~
- ~~Avoid large paved areas; break up expanses of pavement into manageable areas. Where parking areas are required, try not to put them in front of the residences~~

~~The design appropriateness for Patrick Fanus should be measured against these design standards and practices to provide a design that fits the site and reflects the site's beauty and natural environment~~

Growth Inducing Aspects: Pump station increased capacity and force main replacements ~~provide~~ have been sized to correct the under capacity of the existing pump station as well as to meet the needs of the Patrick Farm project. No additional growth capacity that was not quantified sufficiently included beyond the Patrick Farm requirements.

Miscellaneous Comments

Page 3.4-8 The Comprehensive Plan recommends clustering wherever possible to provide the maximum amount of usable open space. How does this plan respond to the comprehensive plan recommendation? How will open space be maximized by this approach? ~~For a development of this size, little is offered in terms of useable open space. A separate open space plan should be designed linking community facilities with the open space network. For a development of 200 acres, open spaces other than water bodies or wetlands are scarce.~~ The DEIS should describe the purpose of the proposed open spaces.

Page 3.4-9 States: ~~"The design concept applies the principles of new urbanism in providing a greater core density and lower density in the periphery. The project's proposed layout is not a clustered design per se but is designed to provide a balance between accommodating additional population growth and preserving the site's existing natural resources, specifically on site wetland and the underlying Ramapo River Aquifer."~~ The question is how this responds to the comprehensive plan Comprehensive Plan recommendations? Cluster and density provisions are defined in the Comprehensive Plan. This proposal does not provide a design based upon the new urbanism philosophy and it is misleading to state so. As At a minimum, the comments should be couched with the comment that these are "in the opinion of the applicant rather than a determination of fact." The development provides only two densities, multifamily homes and single family homes.

The DEIS indicates that development would be located in close proximity to local community shopping -~~It~~ it is noted that there is no shopping within reasonable walking distance which will necessitate using automobiles. This impacts sustainability as well.

The DEIS discusses a ~~"concentric design": In vague terms a concentric design can be envisioned.~~ However, there is no commercial development in the center -as concentric rings and theory would support; there is no significance to the concentric design in ~~tenn~~ terms of circulation, sustainability and mitigation of impacts. ~~A more salient concentric design would be to have all of the multi-family homes surround the pond and then be surrounded by the single-family homes. This however, has not been proposed or evaluated.~~

DEIS states that the design and scale of the proposed action are expected to be compatible with respect to the existing buildings, streets and amenities, and the project's surrounding area. This statement requires further support and explanation as this is certainly not compatible with neighborhoods of single family only homes.

~~The DEIS suggests "balance" in terms of type and affordability. There are questions regarding definition of balance: The original 61.3 acres which is now slated for the zone change to MR-8 would have at best provided 61 homes (without roads and deductions) for theoretical comparison. The new zoning would create 61 * 8 or 488 units -an increase of 427 units. If the applicant seeks to gain the additional number of units based upon the affordable units, then evidence needs to be provided demonstrating the reduced cost of the affordable units compared to the gain in the number of units. The numbers do not appear to be balanced at this point. More significantly, the affordability terms are not defined. As such it is not possible to comment accurately on the affordable units.~~

~~Where is the open space balance? What open space resources have actually been preserved except for a few small play areas? Developments of this size should have a comprehensive system of open spaces. The spaces provided are merely leftovers between buildings and not~~

~~"usable" open space.~~ The DEIS should describe how the proposed open space areas provide balance to the developed areas of the site. Effective open spaces provide paths, (other than roads) to link different areas, lead to scenic vistas, and recreation areas as well as vegetated areas to buffer residential developments.

~~A development of this size should contain~~ The applicant may wish to consider providing community recreation facilities. ~~None have been proposed. Amenities could include such as a club house, tennis courts, swimming pools, basketball courts, putting greens, and meeting rooms. Why are none offered?~~

The area west of Route 202 is zoned for 80,000 square foot lots and is better than 50% wetlands and wetlands buffer. ~~By definition, it is not developable and should not be used~~ The DEIS should provide the rationale for using this land area to compute additional density east of Route 202.

Affordability-

The term affordable is used, but is not defined as to how affordability was determined. Without the detailed descriptions of how affordable is calculated, there can be no effective analysis of the benefits or appropriateness of the affordable constructs. Please provide ~~a detailed affO);dability-~~ analysis defining the following:-

- ~~•—Affordability definitions—target income limitations;—~~ proposed parameters for the pricing limitations; other eligibility requirements;—
- ~~•—Cost or rent level of construction of each unit type used to determine affordability and project benefits—~~
- ~~•—Consolidated view of overall projected costs of market rate, affordable~~ the housing units, ~~and emergency service units to determine "economics" of proposal—~~
- ~~•—Full cost benefit analysis to guide review—~~
- ~~•~~ A market study should be provided to support all of the above and reference any pertinent local or regional standards or examples.

Evaluation of Alternatives:

The DEIS should provide the rationale for selecting the chosen alternative. The applicant should insure that the selected option has the least environmental impacts, or at least that the impacts have been mitigated to a sufficient degree.

~~The 25% reduction alternative has far less impacts. The connection to Route 306 would be required for all alternatives since any development of this size would require two means of ingress/egress. A one way in and out would not be an acceptable alternative as pruning the alternatives does not present a fair comparison.—~~

~~The alternatives presented for the housing choices are in retrospect only one choice — townhouses with 3 or more bedrooms. The opportunity to present a wider choice of homes has been missed. The singular focus of this development denies other housing needs and goes against~~

~~the concepts of sustainability which provides multiple housing alternatives for trade up and down as the needs dictate.~~

~~The evaluation of one type of house compared to another is only one small aspect of sustainability. The sustainability portion of the DEIS should discuss how to lower fixed and long-term energy and overall costs and how this development would accomplish it. Sustainability measures could significantly lower impacts if for instance vehicular travel is reduced. Sustainability developments encourage people to walk through the use of:~~

- ~~• Centrally located commercial and office uses~~
- ~~• Centrally located recreational facilities~~
- ~~• Sidewalks~~
- ~~• Pedestrian Paths and Bicycle Paths~~
- ~~• Mass transit~~

~~None of these are proposed in this submission, nor are they discussed;~~

~~The energy consumption/sustainability factors are not listed including discussion of:~~

- ~~• Additional insulation and energy efficiency~~
- ~~• Smaller footprints and buildings~~
- ~~• Energy producing or reducing techniques (Solar/wind/hydro etc)~~
- ~~• Water reuse; Water saving devices; water heating efficiencies (solar or instant HW Systems)~~

Summary Comments:

~~The proposal and DEIS need to provide additional evidence and rationale needed to support the change from a one acre single family development of 136 homes on 206 acres to a project of 497 homes on the same 206 acres. The impacts to the existing character of the neighborhood appear significant and the benefits have not been sufficiently explained to warrant the additional environmental impacts from the projected development. No clear cost benefit analysis exists to support the project. The primary areas lacking are sustainability, mitigating environmental impacts and diversity of housing options (particularly in terms of the size of the unit since there are no studio, one bedroom, two bedroom or three bedroom units discussed). Every community should provide a mix of unit to provide move up and down opportunities as people age and their circumstances change. Singles, newlyweds, active adults, and seniors are not accommodated by the housing options proposed for this development. If a development of this size does not address the need for the diversity of housing options other than large single family and large townhouses, then the appeal of this proposal is diminished.~~

~~Additionally, the conceptual design does not demonstrate the sensitivity to the natural environment. Rather than a design with nature, the straight streets and on street parking focus the design on the automobile and the creation of an urban environment superimposed on this rural setting. The lack of practical and usable open space and community facilities provided as well as the insensitive design of the multifamily units work against this project. Viewing the unnecessarily straight street design that features the public views of automobiles over a more~~

~~sensitive design, only serves to accent the impacts rather than the benefits of the proposal. These are items that can and should be addressed in the DEIS.~~

This office offers these comments while reserving the right to make additional comments as the design proceeds.

Should you have any questions regarding these comments, please feel free to contact this office.

Kind regards,-

John F. Lange

Senior Associate for Planning

Frederick P. Clark Associates, Inc.