


From: Deborah Munitz deb@welcomedriver.com 

Subject: Millers Pond Amended Findings

Date: August 9, 2023 at 4:34 PM

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The detailed agenda was posted some time on or after 9:55am including a resolution and attachment of 69 pages in total related to the Amended Findings for Millers Pond, this should have been posted to the public at least 24 hours in advance under Open Meeting Law.

The DGEIS could not, and therefore did not consider the environmental impacts related to the site plan and the bulk tables proposed here and these environmental impacts are deserving of a limited supplemental EIS that includes consideration of alternatives to mitigate impacts.

The neighbors who will be impacted by the rezoning were not ever notified of the DGEIS and have not yet been notified of the site plan and rezoning. To consider making a SEQRA finding in advance of even one public hearing from those who will be impacted is just wrong. This was never done in the past for large projects like the Patrick Farm, Pascack Ridge and the Watchtower and it should not be done now.

ROSA 4 Rockland paid for a professional planner to write a letter dated February 14, 2023 to the Town Board that recommended a limited EIS for the project to address the environmental concerns that could not be address in the DGEIS. I am enclosing this letter again today to remind the Town Board of these recommendations when considering the Amended Findings.

The Amended Findings make substantial reference to a document titled "EAF Supplement" document but I could not find it in the packet. Since it is to be relied upon for your resolution it should have been posted to the public at least 24 hours in advance under Open Meeting Law.

There are multiple component being considered here: the rezoning local law, the site plan, and the open space plan. I did not see a County Planning GML letter on the site plan or the local law so I am presuming that a GML referral has not yet occurred.

I found out through the proposed resolution that the project was on the June 6, 2023 meeting which I missed because the project name was misspelled and when I searched for Millers Pond it was not found. The packet is 935 pages and can not be reviewed today. I skimmed through the packet and did not see site plan maps that would sufficient for any involved agency to review for SEQR purposes.

—> I am recommend the Town Board hold off on approving the proposed Amended Findings until after it has at least held one public hearing on Town Board actions and additional submissions have been made to support a SEQR finding or SEQR study. Since you are basing the findings on the NRDP documents it is recommended that you post all Millers Pond documents to the NRDP SEQR page for public access prior to adopting any findings and prior to the public hearing.

I believe that Joseph Karnovsky is sincerely interested in doing what is necessary to complete a professional review of the project and to assure the public that his project has been subject to a hard look. After so many years of delay, and the need to hold additional public hearing before making any final decisions. Holding off on a SEQR determination until after those hearings makes all the sense in the world and I encourage the board to make motions to support transparency and to demonstrate concern for the public and first responders. And to give the

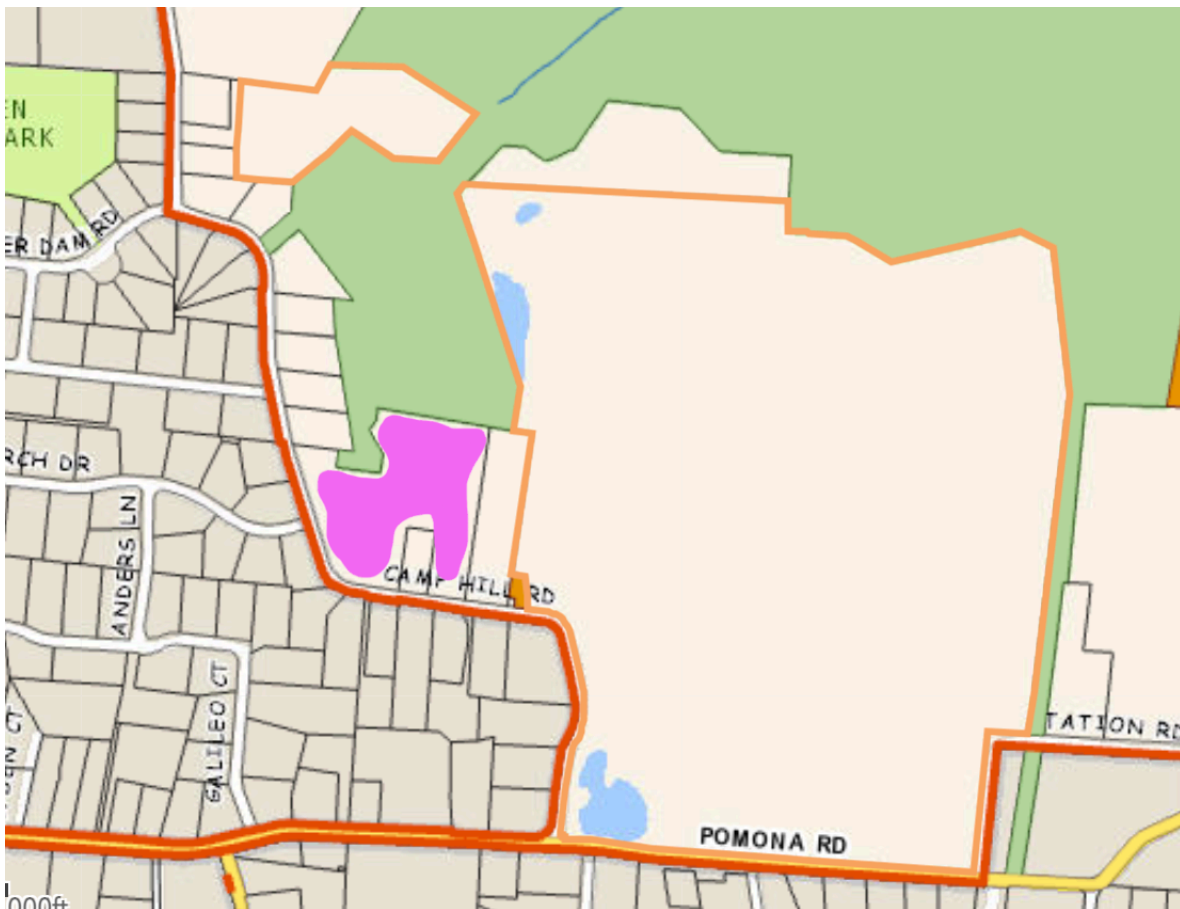
professionals in County Planning an opportunity to make their recommendations as well.

Best wishes
Deborah Munitz, Board Member
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COMMENTS

Off the top of my head based on an extremely cursory review, it is my finding that the Amended Findings do not address a number of major environmental concerns and obviously does not include any consideration of reasonable alternatives that the Town Board should be considering for a project of this magnitude on a highly environmental site.

1) WATER WELLS: The impact of the site plan on the Veolia well at 12 Camp Hill Road (33.13-2-11) was not accessed. I mentioned to Joseph Kazarnovsky that a limited EIS should consider the impacts of the extensive cut and fill on the wetland lade site and on the local wells and that an alternative to be considered should include the elimination of basements. 637 units with footprints of only 1,500 sf x 9' = 8,599,500 cubit feet plus of soil displacement. This is a huge impact on the groundwaters in this area that is wholly within a groundwater protection zone and this alternative which reduces the developers development costs should be considered.



2) VISUAL IMPACT - There can be no denying that a significant visual impact will occur on Pomona Road and Camp Hill Road. The visual renderings in the DGEIS did not analysis this at all. There was no consideration of alternatives and mitigation. I could not find the supporting

materials supporting this statement: "The Project Sponsor is providing enhanced landscaping to minimize the visual impacts of the Site.18 The proposed plan proposes the Site frontage on Pomona Road to remain substantially the same in terms of visual character, with the existing pond, parking and clubhouse on Pomona Road to remain as is, and the existing curb cut location to remain the same for the primary Site entrance/exit with an enhanced landscape feature at the entrance."

I suggested a consideration of changing the location of the large commercial building to north of the clubhouse instead of west of the clubhouse to enable the clubhouse to obscure the new tall apartment building. I can't see any consideration of any alternatives and no support for no impact.

3) TRAFFIC IMPACT - The DGEIS did not consider any of the New Hempstead rezoning in the immediate area on traffic and any analysis of the cumulative impact. Did any of the traffic impacts consider this? Based not he proposed findings it seems that this was not taken into consideration. Then there is the question on what new traffic will be generated by the public coming to visit the commercial portions of the new site.

Was there any consideration of "complete streets" standards? What about the narrowness of the local roads and suitability for fire fighting. The main road were evaluated by RAN but RAN makes no comments on the suitability of the rest of the roads.

4) WATER IMPACT - There isn't even a single mention of fire flow analysis despite the Town Board's awareness of how large an issue this is. I did find two mentioned of "water pressure" but could not research further because of the missing EAF Supplement. The findings recognize that the NRDP did not address certain key issues that must be evaluated at this time: "In relation to emergency services (police, fire, EMS), the NRDP GEIS Findings Statement finds that mitigation measures should evaluate response times, water pressure, and water supply. These aspects of the proposed Project, as well as emergency access, are being addressed with the Project design and agency coordination, as described in the EAF Supplement."

4) Population and school age children - this seems to be a crazy part of the proposed findings. The very idea that 637 units will only generate a total of 616 students seems laughable. The Amended Findings does not even include a total bedroom count. Appendix M of the DGEIS included an estimate of 2,460 bedrooms. How on earth can the Town Board consider a project that might result in 2,460 that included only 616 school age children and base findings on such an irrational number. This must be reconsidered.