



**ROSA 4 ROCKLAND INC.
RAMAPO ORGANIZED FOR SUSTAINABILITY AND A SAFE AQUIFER**

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September 13, 2023

Supervisor Specht and the Town Board of Ramapo
Town of Ramapo
237 Route 59
Suffern NY 10901

Delivered by email to: OsherovitzS@ramapo.org

Re: *"PUBLIC HEARING ON LOCAL FOR MILLERS POND*

Thank you for posted the Millers Pond SEQR documents on the website. We note that unlike past practice for zone changes and local laws there was no legal notice posted on the Ramapo website for this evening's public hearing. We ask that you consistent post all notices going forward on the website for such major Town Board Actions.

We managed to find the Journal News notice of August 30th so we know this meeting is to obtain public comments to consider the PUD application for Millers Pond and the proposed Local Law that was included in Appendix K of the SEQR documents. With the public notice on the website you should include Local Law being proposed.

**EXTENSION OF TIME FOR COMMENTS AND REQUEST TO KEEP
HEARING OPEN**

ROSA requests the Town Board to change the planned comment due date from Friday 9/22 to a date one week following the deadline for the Rockland County GML submission to afford ROSA and the public the opportunity to read their professional planners' comments before submitting our own.

ROSA opposed the Local Law in its current form and intends to submit professional review letters and again reiterates its position that the DGEIS failed to consider this application due to the lack of any proposed local laws for PUDS or the availability of the project plans at the time of scoping in August of 2019.

While ROSA has not opposed the Northeast Comprehensive Plan and the Local Law submitted much of that reasoning was due to the expectation based on how the Town Board responded to the DGEIS that project

specific DEIS's would be produced to incorporate the data and analysis done in the DGEIS for the northeast plan with project specific supplementation. Many impacts of this project were not evaluated in the DGEIS and not alternatives were considered in the DGEIS for this project.

The Town Board should be open to considering and evaluating alternatives to concerns raised by during this public hearing.

ROSA asks the Town Board to direct the Town Planner to write a review memo analyzing the local law and how it conforms to or departs from Ramapo's traditional zoning code.

ROSA notes that this proposed Local Law is a major departure from conformance with the Ramapo zoning code as there are no modification to the Use Table or Bulk Tables included and it supersedes a wide variety of other zoning regulations like building spacing, parking waivers, subdivision regulations, no special bulk deductions and so on. The public should not be expected to analyze these details and there should be a clear memo from the Town Planner that evaluates the differences and the potential impacts.

The development has produced a lot of information that will take time to digest and there should be a series of public hearings through September and October, to account for the extensive jewish holidays to enable questions and answers and additional studies to be considered.

I take the developer at this word that he wants to be transparent and professional and so far I have experienced that. The Town Board should not rush to approve this Local Law at this time without a process for evaluating public comments and the public should not be expect to comment on thousands of pages of Millers Pond and DGEIS materials.

This project is very large and will have environmental impacts and the easiest way for the Town Board and involved agencies to evaluate all the materials is in the form of a DGEIS that provides a cohesive structure for pulling the information together in one way.

Thank you for this opportunity to comment.

Sincerely yours,

A handwritten signature in blue ink that reads "Deborah Munitz". The signature is written in a cursive, flowing style.

Deborah Munitz
Board Member
ROSA4 Rockland Inc.