

**SECTION C
CORRESPONDENCE**



ULSTER COUNTY PLANNING BOARD
244 FAIR STREET BOX 1800
KINGSTON, NEW YORK 12401
TELEPHONE AREA CODE 914 331-9300

RECEIVED

AUG 22 1994

PLANNING BOARD
TOWN OF NEW PALTZ

August 18, 1994

Mr. Leon Dener, Chairman
Town of New Paltz Planning Board
Town Hall - P.O. Box 550
New Paltz, N.Y., 12561

Mr. Lenard Loza, Chairman
Village of New Paltz Planning Board
Village Hall - P.O. Box 877

Gentlemen:

Attached please find a copy of the Ulster County Planning Board's comments on the DGEIS for Putt Corners Road. The Board appreciates the opportunity to comment on the Study and stands ready to participate in discussions concerning alternative development plans for the area. We sincerely believe that the Putt Corners Road area along with the Ehrman Lands in the Village of New Paltz are important local and regional economic development assets. The combination of regional transportation access, the resources of the State University at New Paltz, and the recreational opportunities at Minnewaska State Park, coupled with a development and marketing plan for the corridor will result in businesses choosing to locate in the Community.

Very truly yours,

Dennis Doyle, Principal Planner
Ulster County Planning Board

DD/dms
Enc.



ULSTER COUNTY PLANNING BOARD
244 FAIR STREET BOX 1800
KINGSTON, NEW YORK 12401
TELEPHONE AREA CODE 914 331-9300

COMMENTS

DGEIS PUTT CORNERS ROAD

AUGUST 21, 1994

The Ulster County Planning Board has endorsed most of the zoning decisions that have resulted in the study area's current status allowing office and industrial uses. The Board wholeheartedly endorses the decision to prepare a Generic Impact Statement for the study area and the cooperation shown between Village and Town governments. We hope that the GEIS process leads to a development plan for the Putt Corners Road area that is firmly rooted in an understanding of the environmental and economic dynamics of the corridor. Toward that end we are disappointed in the failure of the DGEIS to address the challenges of the corridor's development in a forthright manner.

Our comments are directed at those areas where we feel the document should be strengthened before decisions on development alternatives are made.

OBJECTIVES

The objective statement "to assist the Town and Village of New Paltz in adopting a land use plan for the corridor that encourages growth within the parameters of existing zoning", should be amended. The existing zoning is the land use plan for the corridor and changes to this zoning are contemplated by the DGEIS. We believe that the primary objective should be the adoption of a development plan for the corridor that can be encouraged and implemented by community land use controls and infrastructure decisions. Such a development plan should have as its objectives:

- to protect and maintain the environment and character of the community
- to provide jobs to residents of the community and region
- to increase the tax base
- assure that adequate community services are available

WASTEWATER DISPOSAL

The wastewater section of the DGEIS speaks to an agreement between the Town and Village to reserve 50,000 gpd of excess capacity for future development on South Putt Corners Road. While we are unaware of the details of the agreement we have serious reservations concerning the availability of excess capacity. In addition, we are concerned that an agreement of this nature has occurred in the midst of the SEQR process without any apparent SEQR determinations. The Village has a responsibility to service in-district demand before allowing out-of-district hookups to occur. In-district service demand is based not only on existing hookups but also the potential needs of vacant parcels utilizing existing zoning. Build-out scenarios are usually done to forecast demand. We strongly suspect that given the vacant land within the Village entitled to service that no excess capacity exists within the plant. The Board urges a build-out study and completion of necessary SEQR documentation accompany the decisions surrounding this agreement.

APPENDIX F COSTS

Since under all scenarios additional sewage capacity will be needed even if the 50,000 gpd is available the analysis should reflect the cost of this capacity. Costs, we assume, are calculated in 1994 dollars yet many improvements will occur along roads that are not yet built. Inflation should be factored into these improvements.

Under Alternative No. 2 no additional costs for new water mains is assigned to South Putt Corners Road yet new water mains are scheduled for this area as shown on the Water Supply Map.

The amortized municipal-costs shown in Table IV reflect only capital cost requirements without any user fees. User fees should be added to the table and the annual costs then summed to accurately reflect total charges to businesses for water and sewer services. These could then be compared to on-site system costs to give a more accurate picture of the difference. It should be noted that the on-site costs if pressure sewers are utilized is approximately \$5,000 plus \$750 dollars for water supply (pg. 3-15). These additional charges plus the service fees may erode any advantage central water and sewer has from a cost perspective.

WATER SUPPLY

The discussion on water supply is far too simplistic an analysis of the potential impacts of office and industrial development on the Community's water supply system. The

background of the difficulties associated with the system and the district on South Putt Corners Road is known to all officials in the community and can be summarized as follows:

- per capita limitation and potential for surcharge or lack of availability of water
- inadequate backup supplies as required by New York City to meet periodic shutdowns
- lack of a valid contract with the City to supply water to the outlying town districts.

All of these issues should be addressed with hard numbers rather than glossed over in the report. The thrust should be to establish thresholds whereby development in the corridor does not exacerbate these problems.

TRAFFIC

The traffic study presents a forthright assessment of the problems associated with development in the corridor. The need to widen Putt Corners to four lanes is an important breakpoint for alternatives to be considered. Costs associated with this widening are likely to deter development rather than encourage it unless federal or state monies are found which seems unlikely at this point.

Costs associated with intersection improvements necessary for nearly all of the development scenarios should be included in the traffic analysis.

Perhaps the biggest omission in the traffic plan and the design schemes for water and sewer is the failure to locate, even generally, the University Connector. The Connector has been part of traffic planning in New Paltz for several decades. It is to us an imperative that this Connector be included in a substantive way as part of the traffic planning for the corridor.

WETLANDS

There appears to have been a great deal of work done regarding wetlands and the potential for hydric soils to be classified as COE designated wetlands. Maps showing these areas should be included in the DGEIS. It is especially important that the proposed internal road system on South Putt Corners Road avoid potential COE wetlands to insure its continuity between parcels.

The DGEIS is unclear as to whether hydric soils with potential for designation as COE wetlands were eliminated as developable land in determining potential buildout within the corridor. If they were included the extent of these areas and an estimate of the percentage likely to be designated should be added to address the magnitude of the problem.

STORMWATER

We concur with the DGEIS recommendation that the Town/Village should develop a stormwater master plan for the Corridor. This is critical if many small lots are developed over time as is envisioned by all of the alternatives. Stormwater control on small lots is often overlooked and difficult to provide, but the cumulative impact often creates drainage problems which impact wetlands and drainage structures.

PESTICIDES

The presence of pesticides in the corridor is a serious problem both in terms of costs for development and marketing problems. It would be helpful if the DGEIS put forth some costs analysis of development of a typical site with and without pesticide contamination to help overcome business reluctance to locate on these sites.

Contrary to the assertion that most old orchards are found within the Village. 1968 air photos show mature orchards over several areas of South Putt Corners Road. Interviews with farmers and residents should be conducted to confirm old orchard locations.

The DGEIS indicates that pesticide contamination is more difficult to remediate when associated with residential development than office or light industrial construction. If this is true, the presence of old orchards in the Village suggests that office and industrial uses are appropriate and alternatives that propose rezoning the area for residential use should be more carefully examined.

MARKET/FISCAL ANALYSIS

The mere presence of a plan and infrastructure does not mean that businesses will locate in the area. The decision to invest in infrastructure should be accompanied by a market analysis which looks at absorption rates and arrives at a timetable for buildout. We suspect that absorption rates for office space and light industrial structures in the region are low enough to seriously jeopardize infrastructure financing. Some indication regarding the need for this type of development can be deduced from the lack of activity in the corridor already. Yet we recognize that infrastructure availability is a deciding factor in the locational decisions of many businesses. In this regard it may be possible to purchase capacity in the sewage treatment plant placing the money in escrow for future expansion as buildout within the existing district requires it.

LAND USE CONTROLS

Throughout the DGEIS are references to site plan review changes and allowable land uses. The recommendations for site plan review should be consolidated into a matrix format for easy reference for incorporation into the zoning statute.

The use schedule for the I-1 District and the PB District should be reexamined. If sewers are provided, commercial parking lots, automobile storage or repair, car wash, equipment rental or sales yard, gas stations, and mining, should be eliminated. These uses offer little in terms of job generation and tax revenues, wasting valuable lands. In addition, some uses may detract from the corridor's marketing potential. It does however, seem appropriate to add hospitality uses especially hotels and conference centers to the schedule.

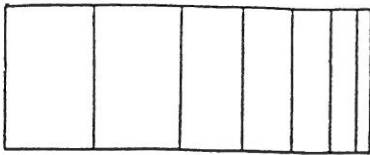
VISION

The Board offers the following scenario of a development plan for the area based in part on the material contained in the DGEIS and assumptions concerning some of the answers to questions we have raised. This section is provided to encourage discussion rather than as comments on the DGEIS and the Board recognizes the need for other alternatives and flexibility as additional information comes to light during the completion of the SEQOR process.

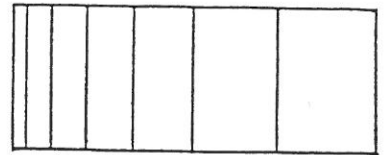
- rather than service the entire area with sewers only a portion of South Putt Corners Road is serviced. Service to areas on North Putt Corners Road outside the Village is dependent on the design of lines to service the Ehrman Lands. Large water users are precluded or alternative treatment methods required by a sewer budget enacted as part of the district formation or included in the zoning ordinance. Capacity for sewer service is purchased from the Village on a per gallon basis. This money is placed in escrow and used to help defer capital costs for plant expansion when it is needed. This insures that the Village can meet its responsibilities to provide for buildout of its in-district demand while at the same time allowing current excess capacity to be utilized.
- water service, although available on South Putt Corners Road, is restricted by zoning provisions similar to the sewage restrictions. The water budget is based on the ability to meet NYC Water Supply obligations for per capita limitations and backup supplies. The decision to service only part of the area with sewer helps to reduce water use outside the sewer area.

Ulster County Planning Board - Comments DGEIS Putt Corners Road

- the University Connector is sited. To encourage its construction a hospitality overlay district is adopted that extends between South Putt Corners and NYS Rt. 32. In addition to offices and light industrial uses, hotels and conference centers are permitted in exchange for site plans in accordance with the design of the Connector. Agreements are required to participate in a highway improvement district to complete the Connector.
- traffic impacts are controlled by the adoption of a traffic budget for individual parcels. Parcels within the sewer district are allowed more traffic than those outside the district. The budget is set so that South Putt Corners Road does not have to be widened to four lanes. Intersection improvements are funded by a state/county/private partnership.
- given the existing large parcel sizes on South Putt Corners Road stormwater control plans are required on a parcel basis before subdivision is allowed rather than an individual projects within a parcel. This provides a coordinated approach to stormwater that does not overlook the cumulative impacts of small lot development.
- the Village, recognizing the potential of the Ehrman lands allows mixed office and light industrial use of these properties requiring a residential component. The latter insures that water supply per capita limitations are not jeopardized.
- other zoning changes omit uses from the areas with sewer service that offer few job and tax base additions to the community. Buffer areas around the high school are adopted. Frontage requirements on South Putt Corners Road are increased to reduce curb cuts and encourage the construction of internal access roads.



AFFIRM



Association For Intelligent Rural Management
PO Box 626
New Paltz, N.Y. 12561

September 21, 1994

Joint Planning Board of the Town and
Village of New Paltz
New Paltz Town Hall
New Paltz, NY 12561

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SEP 21 1994

PLANNING BOARD

Dear Joint Planning Board:

The following comments on the Putt Corners Corridor Development Plan DEIS reiterate and expand upon those I presented verbally at the public hearing.

The traffic issue is vital, as the DEIS makes clear. Not only do the various potential scenarios have significant implications for the flow of traffic in that area of New Paltz, they also require various improvement mitigations--with significant price tags attached to each. It is therefore essential that the EIS contain as realistic a picture as possible so that the community can make intelligent choices.

The most glaring weakness of the traffic estimates in the DEIS is the absence of projections for the large Huguenot Plaza shopping center proposal currently being considered by the Town Planning Board. Surely, if SUNY fieldhouse traffic impacts are included, this project's impacts ought to be as well. In this regard, it is not adequate to simply take the traffic estimates already supplied by the developer for this project since these have been found inadequate by the Town Planning Board. This area is one of several required realms to be updated and expanded upon in the SEIS for Huguenot Plaza. We suggest that the new DSEIS estimates (with appropriate suggested comments by the Board and public, once these are available) be the basis for cumulative impact inclusion in the present GEIS for the Putt Corners Corridor.

Concerning the pesticide issue, several points. It is not adequate to rely solely on DEC and/or the Dept. of Health to supervise testing and mitigation in this realm. Both agencies have been slower than local jurisdictions, in many cases, to develop adequate measures. And both suffer from continued budgetary and staffing restraints. The New Paltz planning boards should be proactive here, as the Village Planning Board was with regard to the Hamlet subdivision development several years ago.

The potential negative impact of newer pesticides should not be written off simply because the potential toxicity of DDT (and related compounds), lead and arsenic are more obvious. This should remain a potential area of review, especially since new research and new standards are constantly emerging over time.

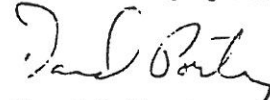
The potential effect of pesticide residues on groundwater should not be ignored. While the effect on surface soils is more obvious, clearly it is possible for toxic particles to find their way down into subsurface groundwater over time. Certain soils allow greater filtration than others. Attention should be given to this potential factor as each project site is reviewed.

Site grading, not just excavation, can be a potential source of toxic soil dangers, especially since the worst toxicity is found near the surface. The effects of toxic windblown soil dust and soil erosion into wetlands or streams could be dangerous--beyond the cited dangers involved in excavation activities.

The community needs accurate fiscal data to help make its decisions. Therefore, each scenario ought to be accompanied in the GEIS with as accurate a price tag as possible. This means accurate estimates of infrastructure improvement costs and the effect of likely tax abatements on tax revenues for the community.

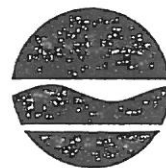
Finally, the GEIS is a very welcome tool in community planning. AFFIRM has been urging its use for nearly a decade. However, it does need to be reiterated that having an accepted FGEIS in place does not preclude the potential necessity for site- or project-specific EIS's if the factors involved in a particular development scenario are not already accounted for and sufficiently reviewed.

Sincerely yours,



David Porter
Co-Chairperson

New York State Department of Environmental Conservation
21 South Putt Corners Road, New Paltz, NY 12561-1696
(914) 256-3000 - Division of Regulatory Affairs



Langdon Marsh
Commissioner

September 21, 1994

MR LEON DENER
TOWN OF NEW PALTZ PLANNING BOARD
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PO BOX 550
NEW PALTZ NY 12561

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SEP 22 1994
PLANNING BOARD
TOWN OF NEW PALTZ

MR LEONARD LOZA
VILLAGE OF NEW PALTZ PLANNING BOARD
25 PLATTEKILL AVE
PO BOX 877
NEW PALTZ NY 12561

Re: Draft Generic Environmental Impact Statement
Putt Corners Road Corridor Development Plan
DEC #5138-0085

Dear Messrs:

Our Department has conducted a preliminary review of the above referenced Draft Generic Environmental Impact Statement (DGEIS). The DGEIS examines the potential environmental impacts of three corridor development options that encompass approximately 390 acres along North and South Putt Corners Road - no growth; growth with current infrastructure; and growth associated with creating new water districts and extending sewer lines into the development corridor. The current zoning of the site area, which is situated in both the Village and Town of New Paltz, is light industrial (I-1) and Professional Business (P-B).

The DEC has no permit jurisdiction over this action since the DGEIS pertains to a planning document versus a specific development action. However, in the event that the Corridor Plan moves forward and specific development plans are proposed, our Department may then have possible permit jurisdiction.

I have noted the following areas that may be subject to DEC permit jurisdiction depending upon which development option is chosen:

Freshwater Wetlands

State regulated wetlands #CD-39, CD-42, and CD-49 are situated within the proposed development area. If any proposed development either directly affects one of these wetlands or encroaches on the 100 foot buffer area around any wetland, a permit under Article 24 will

be required. It is also possible that Federal wetlands may be involved. This should be ascertained with the Army Corps of Engineers' office in New York City (address attached). Filling of greater than one acre of Federally regulated wetlands also needs an approval by this Department under the 401 Water Quality Certification process.

Stream Disturbance

There are two streams situated in the proposed development corridor. The stream located to the north of the Putt Corners intersection (H-139-13-13b) is classified "D" and does not require a Department permit if it is affected by any future development.

The stream located at the southern end of the development corridor to the east of South Putt Corners Road (H-139-13-16-3-3) is a tributary of the Wallkill River and is classified "B"(t). As a result of this stream's protected status (it can be used for swimming and fishing, and is a trout spawning area), any proposed development that is within 50 feet of its banks will require a Protection of Waters Permit from this Department under Article 15.

Water Supply

A DEC Water Supply Permit will be required if a new water supply district is created or an existing water district is expanded. If new sources of water are developed elsewhere in the interconnected municipal water system, a Water Supply Permit would also be needed. In addition, a private water supply system that serves at least 5 service connections on all or part of this planning area also would require a Water Supply Permit.

Wastewater Treatment

In regard to on-site treatment systems, a SPDES Permit will be required to treat

1. more than 1,000 gallons per day (gpd) of sanitary waste only, or
2. industrial wastes of any volume

Please note that while surface discharges may be permitted subsurface discharges of treated industrial wastes are strongly discouraged.

Concerning extending existing sewer lines in the Village of New Paltz to accommodate new development proposed, the DEC does not require a permit if the Village STP has sufficient excess of unreserved capacity. However, the extension of sewer lines does require approval

Town of New Paltz Planning Board
Village of New Paltz Planning Board
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September 21, 1994

of plans by the Regional Water Engineer in our Tarrytown office (telephone number (914)-332-1835 Ext. 3501). If the particular development option chosen necessitates expanding the Village's STP then a SPDES permit modification will be involved.

It is our understanding, according to the DGEIS, that after a particular development option is selected, and planning and design work proceeds with individual development proposals, that more detailed information will be provided to us concerning potential specific environmental impacts. Once our Department is provided with specific development plans, we will be able to inform you of exactly what our permit jurisdiction is.

Please continue to keep our Department informed of all SEQR related aspects associated with the Putt Corners Road Corridor Development Plan. You may call me directly at (914) 256-3057 if you have any questions.

Sincerely,



James Bogner
Regulatory Affairs
Region 3

JEB/adm
Attachment

cc: Jean-Ann McGrane, Regional Director
Daniel C. Sitler, Principal
The Saratoga Associates



STATE OF NEW YORK
DEPARTMENT OF TRANSPORTATION
4 BURNETT BOULEVARD
POUGHKEEPSIE, N.Y. 12603

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OCT 19 1994
PLANNING

ALBERT J. BAUMAN
REGIONAL DIRECTOR

JOHN C. EGAN
COMMISSIONER

September 29, 1994

Mr. Leon Dener
Town of New Paltz
1 Veterans Drive
P.O. Box 550
New Paltz, New York 12561

RE: STATE ENVIRONMENTAL QUALITY REVIEW
DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT
PUTT CORNERS ROAD CORRIDOR DEVELOPMENT PLAN
TOWN/VILLAGE OF NEW PALTZ, ULSTER COUNTY

Dear Mr. Dener:

We have completed our review of the above-referenced document with respect to the potential impacts the Putt Corners Road Corridor Development Plan will have on the surrounding transportation network. We would like to apologize for the delay in our response and request that the following comments be included in the DGEIS comments.

1. Our review of the document has concentrated in part on the Traffic Impact Analysis. The methodology used appears to reasonably estimate and depict future traffic levels, however, we will need to conduct a more detailed review at the time one of the twelve development alternatives is chosen and subjected to a more site specific analysis.
2. Without question, all of the alternatives considered will generate significant levels of traffic that will impact many of the surrounding intersections. In particular, an increase in traffic along Route 299/Main Street through the Village will deteriorate levels-of-service to unfavorable conditions.

At this time, it is our recommendation that serious consideration be given to east-west "by-pass" alternatives to help alleviate the peak hour congestion along Route 299/Main Street in the Village.

The Department supports the conclusion that "construction of an east-west parallel road south of Main Street would significantly reduce travel demand on Main Street." We assume this is in reference to the connection between South Putt Corners Road and Route 32. Consideration should also be given to a "by-pass" road *north* of Main Street.

3. Although a reasonable background growth rate of four percent (4%) per year was used to establish the Year 2000 Background Traffic Volumes, other known developments such as Huguenot Plaza should be included in the projections. At the point more detailed analyses are conducted, this methodology should be adopted.

4. Appropriate pedestrian and bicycle facilities and possible transit alternatives need to be considered early in the conceptual access/roadway design phase.

If you have any questions, or if we can be of further assistance, please contact this office at (914)431-5793.

Very truly yours,

Wai K. Cheung
Civil Engineer II

By:



Kevin J. Novak
Civil Engineer I

cc: L. Loza, Village of New Paltz

State University of New York



College at New Paltz
New Paltz, New York 12561 - 2499

Office of the President

October 3, 1994

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OCT 07 1994

PLANNING

Mr. Leon Dener
Mr. Leonard Loza
Co-chairs
Town and Village of New Paltz Consolidated Planning Board
1 Veterans Drive
P.O. Box 550
New Paltz, NY 12561

Gentlemen:

The State University of New York at New Paltz congratulates the New Paltz Town Planning Board on the successful completion of the environmental impact study and resulting Generic Environmental Impact Statement for the Putt Corners Road Corridor. We appreciate your effort to bring needed industry into the community in a manner that respects the environment and serves the community's interest in additional employment opportunities and tax rateables.

There are several areas of mutual interest between the options proposed in the GEIS and programs or projects at the campus. Efforts to attract light industry, business services and/or computer related firms to the corridor could be strengthened by the presence of our electrical engineering program, Summer Software Institute and our technology incubator (Project IDEA). I would encourage you to work with Peter Fairweather, Director of ID-PLUS to pursue these opportunities.

As you know, the College's recently completed master plan indicated the desirability of eventually constructing an east-west road in the southern portion of the campus. We would be interested in working with the town and village to ensure that, should that internal road be constructed, it aligns with the surrounding road system to ensure maximum benefit to both New Paltz and the campus community.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alice Chandler".

Alice Chandler
President

AC/WWV:ma