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EXHIBIT "J"



PLANIT MAIN STREET, INC.  
P.O. BOX 824, ROCK HILL, NEW YORK 12775

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December 2, 2010

Hon. Sylvain Klein, Planning Board Chairman  
Town of Ramapo Town Hall  
237 Route 59  
Suffern, New York 10901

Dear Chairman Klein:

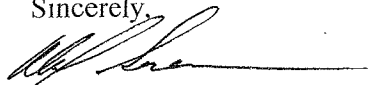
I would like to thank you and the other members of the Town of Ramapo Planning Board for affording me the opportunity to speak before you at the Public Hearing on November 29, 2010 concerning the proposed Patrick Farm Sketch Plan and Preliminary Subdivision review. I have enclosed a copy of my "Talking Point," which I read from that evening for reference and consideration. Please note the attached "Talking Points" include citations for each of the sections of the Patrick Farm SEQRA Findings Statement, which was adopted by the Town of Ramapo Town Board as Final on 1/25/10. It also includes references to the Patrick Farm Subdivision Grading & Drainage Plan drawing numbers, which provide the basis for our comments and conclusions.

I have reviewed the Sketch Plan for the Patrick Farm Subdivision and find it does not comply with the mitigation measures that were outlined in the SEQRA Findings Statement. This is particularly true as it relates to the *preservation of undisturbed vegetative areas along the project perimeter*, which is a critically important mitigation measure that is discussed throughout the Findings Statement.

- "This site layout would allow for the preservation of existing trees, landforms, and characteristic development patterns along the area roads and the screening of denser portions of the development in the center of the property" [Page 22 of 29 Site Design under Mitigation].
- "After construction, the view from the surrounding roadways would be effectively screened by the undisturbed vegetated areas of the project perimeter and by the location of single-family homes along the perimeter of the project site" [Findings page No. 22 of 29 paragraph No. 3].

The Sketch Plan and Preliminary Subdivision Plan drawings provided for your review clearly show the removal of existing trees and vegetation up to the "Right-of-Way" line to make room for a series of retention basins along NYS Route 202. Apparently, these stormwater management systems are necessary to control post-development stormwater as a result of the high density of development that is proposed on the subject site. We recommend the Planning Board instruct the applicant to revise their Sketch Plan and Preliminary Subdivision Plat to maintain the undisturbed vegetated areas of the project perimeter, consistent with the mitigation measures identified in the SEQRA Findings Statement.

Sincerely,



Alan J. Sorensen, AICP  
President Planit Main Street, Inc.



**Patrick Farm Subdivision, Condominiums and Volunteer Housing  
Talking Points for Planning Board Public Hearing  
Town of Ramapo, New York  
November 29, 2010**

**Introduction:**

My name is Alan Sorensen, AICP and I am here to represent a citizen's organization called ROSA (Ramapo Organized for Sustainability and a Safe Aquifer). I am a professional planner with a Master's in City and Regional Planning from Rutgers University and over 20 years of planning experience. I am a former Commissioner of Planning and Community Development for Sullivan County, NY. My firm is Planit Main Street, Inc. with offices in Rock Hill, New York.

**The Process:**

We understand the applicant is before the Planning Board for Sketch Plan Review of the proposed Patrick Farm Subdivision. Sketch Plan is the applicant's first opportunity to try and place as much development as they can on a project site. It's the starting point in the review process, not the end. The Planning Board has the right to request revisions to the Sketch and Preliminary Subdivision Plans, especially when the Sketch Plan does not comply with the SEQRA Finding Statement.

**Patrick Farm SEQRA Findings Statement [Final dated 1/25/10]:**

The SEQRA review covered the *Proposed Action* that was defined as a Zoning Map Change, Revisions to the Comprehensive Plan and Subdivision and Site Plan Approval of the Patrick Farms Property.

- The Town Board has subsequently adopted the Comprehensive Plan and Zoning Map revisions.
- The applicant is now before the Planning Board for Sketch Plan and Preliminary Subdivision Approval.

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Pursuant to Part 617.11 (d) (5) of the State Environmental Quality Review Act (SEQRA) a Findings Statement must "Certify that consistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the extent practicable by incorporating as conditions to the decision those mitigation measures that were identified as practicable.

## Patrick Farm

### Page 2

The Findings Statement for the Patrick Farm, Town of Ramapo – Rockland County, New York establishes a number of conditions and thresholds, which were intended to act as mitigation measures as follows:

- Density of Development – The Patrick Farm Development would consist of 497 residential units comprised of 410 multi-family units (i.e. 314 TH, 72 *workforce condominium* flats and 24 rental apartments) and 87 single-family homes [Findings page 12 of 29].
- Site Disturbance – Of the 208.5-acre site, 113.7-acres (55.3%) will be cleared for construction and the balance 94.8 acres or (44.7%) will be undisturbed [Findings page 4 of 29, Section 3.1].
  - Planit Main Street, Inc. comment: The applicant should graphically illustrate the “Limits of Disturbance” for each of the single-family lots and quantify the disturbance for the entire site in order to verify the proposed Subdivision, Condominiums and Volunteer Housing will not exceed the threshold of site disturbance as reflected in the Findings Statement.
- Groundwater Mitigation – “The groundwater recharge system is designed to capture rooftop runoff to infiltrate that runoff into the ground in a manner and quantity that mimics the natural water cycle. As a result of these measures there will be no anticipated post development loss in recharge capability of the site to the underlying aquifer” [Finding page 8 of 29, Section 3.2 Mitigation].
  - Planit Main Street, Inc. comment: We question whether the Patrick Farm Groundwater Recharge System adequately addresses groundwater “QUALITY” for the quantity of water, which is being infiltrated into the sole source aquifer.
  - Planit Main Street, Inc. comment: If infiltration mimics the natural water cycle, why are so many retention basins being proposed along NYS Route 202?
  - Planit Main Street, Inc. comment: Will proximity of retention basins to edge of NYS Route 202 affect the quality of water being infiltrated into the sole source aquifer?

- Project Layout – “The project layout has been designed around the natural site conditions to minimize impacts to sensitive environmental elements (wetlands and steep slope areas)” [Findings page No. 13 of 29, Paragraph No. 3].
  - Planit Main Street, Inc. comment: The project layout for the Condominium portion of the project is NOT designed around the natural conditions of the site, nor does it minimize impacts to sensitive environmental features. In fact, it instead contemplates significant cuts and fills which will simply remove these natural features from the landscape and replace it with an incredibly dense and highly impervious manmade environment that is in stark contrast with the existing character of the community.
- Aesthetic Resources – “After construction, the view from the surrounding roadways would be effectively screened by the undisturbed vegetated areas of the project perimeter and by the location of single-family homes along the perimeter of the project site” [Findings page No. 22 of 29 paragraph No. 3].
  - Planit Main Street, Inc. comment: The project layout calls for a series of retention basins to be installed along NYS Route 202, which will require the removal of existing vegetation up to the Right-of-Way Line. In total, 1,080 liner feet a vegetative buffer along the project perimeter will be removed to provide for these retention basins. This will open up views of proposed single-family homes and the entire multi-family condominium complex from NYS Route 202 [see Patrick Farm Subdivision Grading & Drainage Plan Drawing Nos. 14-16].
- Site Design – “The site design for the proposed development would locate single-family residences on the lots with frontage along NYS Route 202 and 306 and Scenic Drive, while townhouses would be clustered in the central portion of the property” [Page 22 of 29 Site Design under Mitigation].
  - Planit Main Street, Inc. comment: The proposed Condominium portion of the project is not clustered in the “Central Portion of the Site.” Instead it is situated with Condominiums as close as FORTY (40) FEET to Old Haverstraw Road [see Patrick Farm Subdivision Grading & Drainage Plan Drawing Nos. 14-16].

- Site Design “This site layout would allow for the preservation of existing trees, landforms, and characteristic development patterns along the area roads and the screening of denser portions of the development in the center of the property” [Page 22 of 29 Site Design under Mitigation].

Planit Main Street, Inc. comments:

- Again, the proposed Condominium portion of the project is not clustered in the “Central Portion of the Site.”
  - The substantial clearing of trees to make way for the retention basins along NYS Route 202 will provide unobstructed views of these Condominiums [see Patrick Farm Subdivision Grading & Drainage Plan Drawing Nos. 14-16].
  - The Condominiums are proposed to be terraced or stacked along a denuded hillside with the rooftops of the Condominium buildings reaching an elevation of over 500 feet msl, when the base elevation along NYS Route 202 at the site entrance is only 408 feet msl.
  - The proposed Condominiums will NOT be screened from public view, but instead will be in stark contrast to the existing rural character of the community.
- Scenic Road Considerations [Findings Statement].
    - “Substantially Preserve Scenic and Natural Features of the Site.”
    - “Preserve Existing Vegetation to Screen Structures from Public View within the Scenic Road District.”
- Findings Thresholds: [Findings page 24 of 29, 3<sup>rd</sup> bullet].
    - “The existing woods are proposed to be retained to a depth of 30-50 feet on Lots 79-82.”
      - Planit Main Street, Inc. comment: [Lot 79 will be cleared to Right-of-Way Line – see Drawing No. 15].
    - “The existing woods are proposed to be retained to a depth of 20 to 100 feet on lots 70-77.”
      - Planit Main Street, Inc. comment: [Lots 72 & 73, 75, 76 are cleared to Right-of-Way Line – see Drawing No. 16].

- Planit Main Street, Inc. comments: In total, 1,080 liner feet of the project site, or the equivalent of the length of three (3) football fields, will be cleared to the Right-of-Way Line along NYS Route 202 between Lot Nos. 72 and 79 [see Patrick Farm Subdivision Grading & Drainage Plan Drawing Nos. 14-16].
  - Due to the extent of clearing proposed along NYS Route 202, single-family houses on Lots No. 72, 73, 75 and 76 will be visible from NYS Route 202 across the new retention basins;
  - Of greater concern is the *unobstructed view* of the multi-family condominiums that will be provided through the 480-foot clearing, which will be created in order to establish the retention basins between NYS Route 202 and Old Haverstraw Road.
  - DEIS Figure 3.9-14: Key Map of Architect's Renderings for Patrick Farm clearly shows preservation of existing vegetation between Old Haverstraw Road and NYS Route 202 without retention basins. The proposed Sketch Plan for the Subdivision shows the existing trees in this vicinity removed, thereby eliminating an important mitigation measure (i.e. undisturbed vegetative areas around the perimeter of the site).
- Building Elevations: "The Project Sponsor is committed to selecting residential architectural styles that complement the most pleasing examples in the community. Colors and materials would be chosen to integrate the buildings with the natural landscape and the character of the locale. The multi-family dwellings will be subject to architectural review" [Findings page No. 22 of 29 last paragraph].
  - Planit Main Street, Inc. comments. While the Visual Assessment in the DEIS provided a few color illustrations of the proposed Condominiums, the applicant has not provided elevations draw to scale for the Planning Board's review and evaluation.
  - Planit Main Street, Inc. comments: We recommend that elevations draw to scale be provided for the Planning Board's review and recommendation so the potential visual impacts can be further evaluated.

**Comprehensive Plan:**

The Town of Ramapo Comprehensive Plan Community Resources and Character Section include policies for scenic road protection. One of the policies is as follows:

- “Require that new buildings be sited so as to minimize their visual impact (e.g. prevent the construction of buildings on the tops of ridgelines and hills where they would be highly visible).”
  - Planit Main Street, Inc. comments. The proposed condominiums will be highly visible from NYS Route 202 due to extensive clearing of the vegetative buffers along Route 202, coupled with the placement of buildings at the top of hill.

Again, Sketch Plan is the applicant’s first opportunity to try and place as much development as they can on a project site. It’s the starting point in the review process, not the end. The Planning Board has the right and responsibility to request revisions to the Sketch and Preliminary Subdivision Plans, especially when the Sketch Plan does not comply with the SEQRA Finding Statement.



**Exhibit A**  
**Patrick Farm Subdivision**  
**Grading & Drainage Plan (part 2 of 9)**  
**Drawing No. 14**

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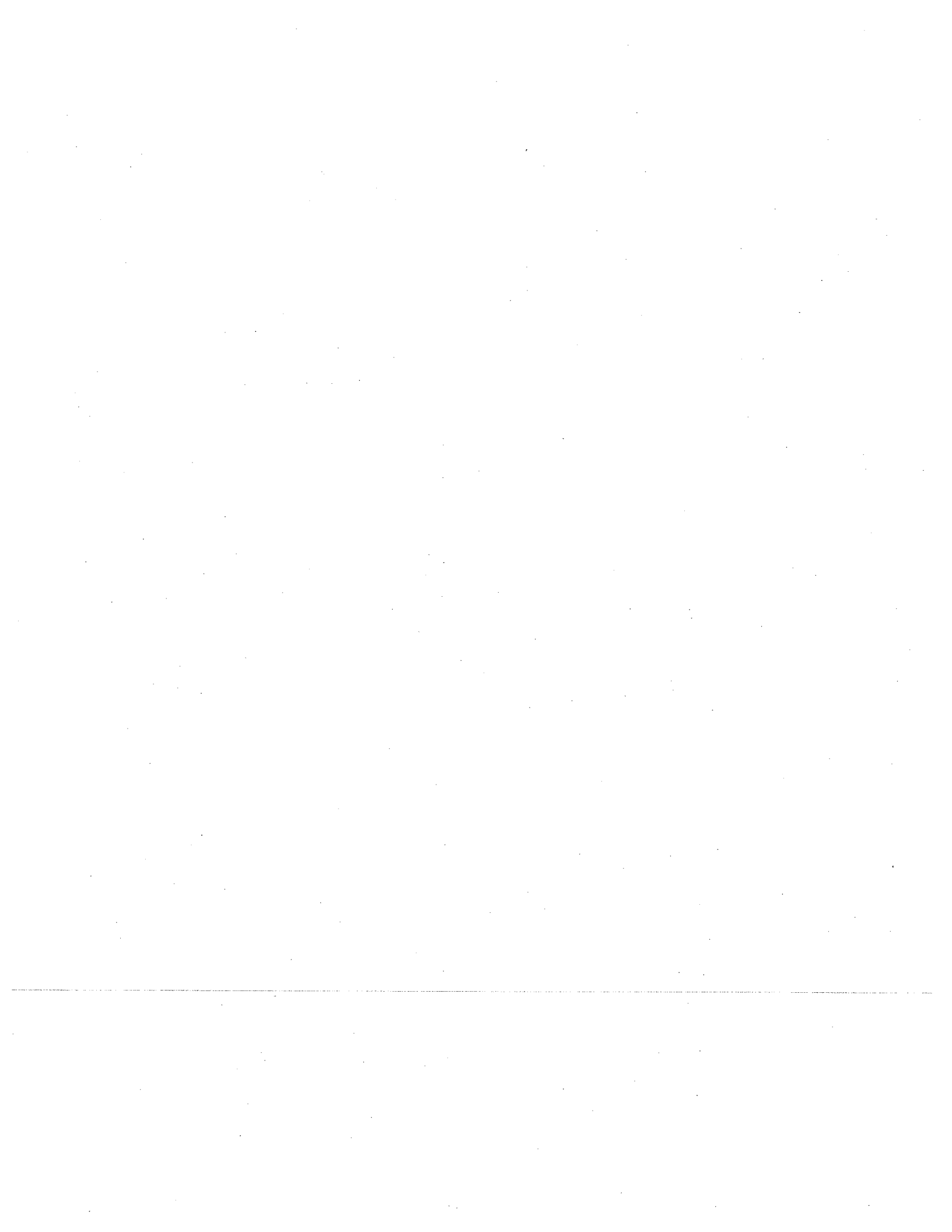
**Exhibit B**  
**Patrick Farm Subdivision**  
**Grading & Drainage Plan (part 3 of 9)**  
**Drawing No. 15**

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**Exhibit C**  
**Patrick Farm Subdivision**  
**Grading & Drainage Plan (part 4 of 9)**  
**Drawing No. 16**

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**Exhibit D**

**Patrick Farm Subdivision**

*Draft Environmental Impact Statement Figure 3.9-14  
Key Map of Architect's Renderings for Patrick Farm*

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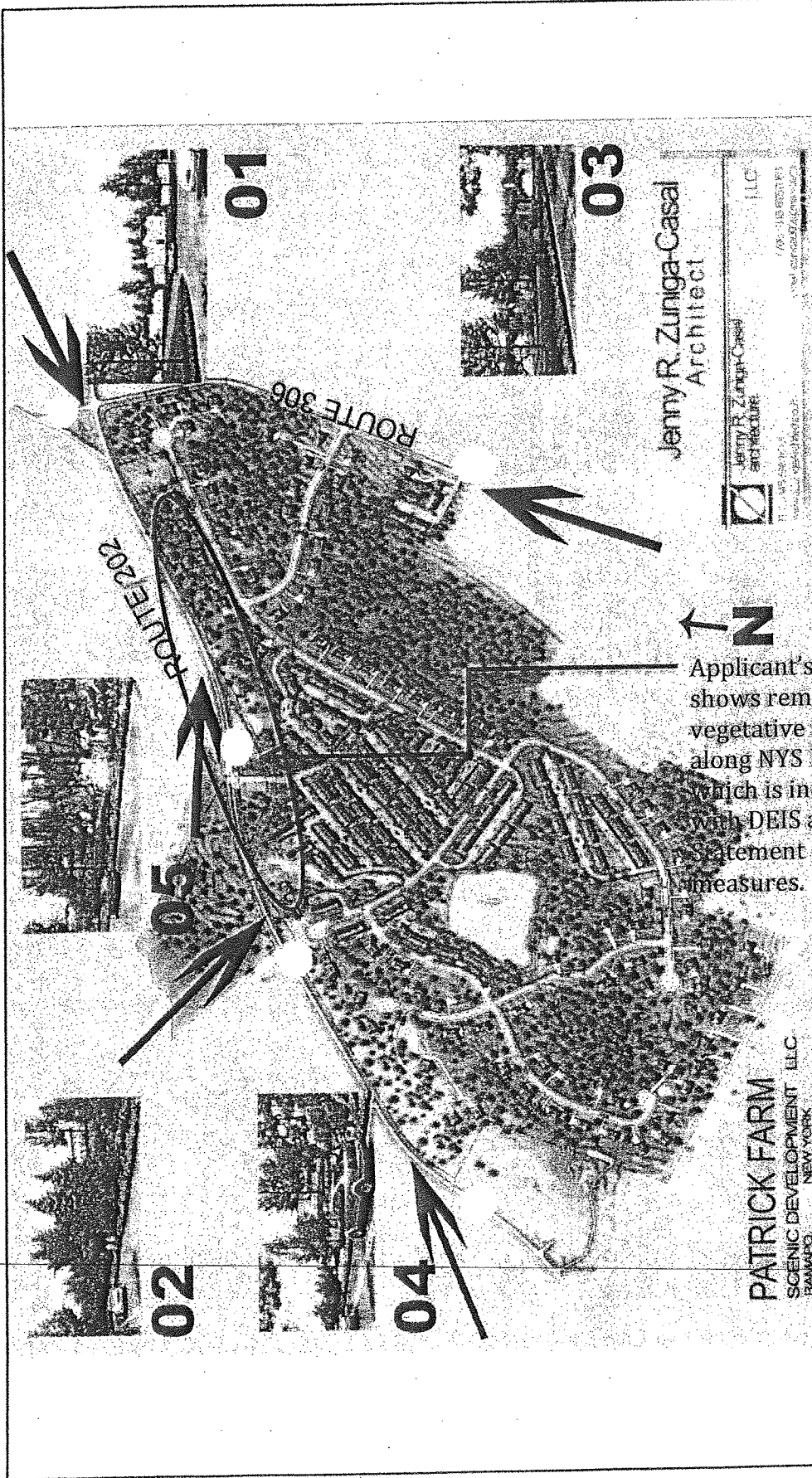


Figure 3.9-14: Key Map of Architect's Renderings  
 Patrick Farm  
 Town of Ramapo, Rockland County, NY  
 Source: Jenny R. Zuniga-Casal Architecture  
 Date: 3/16/09

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Patrick Farm  
 Sheet 1