

DEPARTMENT OF PLANNING
Dr. Robert L. Yeager Health Center
50 Sanatorium Road, Building T
Pomona, New York 10970
Phone: (845) 364-3434 Fax: (845) 364-3435

Douglas J. Schuetz
Acting Commissioner

Arlene R. Miller
Deputy Commissioner

October 14, 2020

Town Board
Town of Ramapo
237 Route 59
Suffern, NY 10901

Re: World Headquarters of Jehovah's Witnesses Audio/Video Production Center

Dear Town Board:

As an ongoing interested party for the New York State Environmental Quality Review Act (SEQRA) process, our department has reviewed the Scoping Document for the above referenced proposal. The purpose of the Scoping Document is to identify the issues to be addressed in the Draft Environmental Impact Statement (DEIS) for the proposed zoning text and map amendments to create a new mixed-use MU-3 zoning district, as well as for the site plan and lot consolidation applications. These actions are also subject to our review under Section 239-m.3.(a)(i), (ii) and (iv), Section 239-n.3(i) and (iii), and Section 239-nn.3.(b) and (c) of the New York State General Municipal Law (GML). The subject site is located on Sterling Mine Road, a County road, and is immediately adjacent to the Town of Tuxedo in Orange County. It is within 500 feet of the Nakoma Brook, a county stream, and Eagle Valley Road, a County road. The property is environmentally constrained in that it is steeply sloped and contains rock outcrops and wetland areas. Our review of the DEIS will focus on the impact of the proposed actions on these GML criteria, as well as community character, infrastructure capacity and other issues of countywide concern. It will also consider whether the proposed actions are consistent with the goals and objectives of the *Town of Ramapo's 2004 Comprehensive Plan* and the *2011 Rockland Tomorrow: Rockland County Comprehensive Plan*. We believe the Scoping Document presents a detailed framework for the DEIS ensuring that most areas of concern are considered. We offer the following comments on the Scoping Document and the related SEQRA materials.

The August 12, 2020 Positive Declaration was included with the materials submitted to this department. Number 9 of the "Reasons Supporting This Determination" must be revised to indicate that the proposed project is inconsistent with the Town's adopted comprehensive plan and/or the community character of the surrounding properties. An entirely new zoning district is proposed for the 242-acre site that was not envisioned in the *2004 Comprehensive Plan*. This paragraph also discusses an evaluation of the fiscal impacts on the Town, the local school system, emergency providers serving the property, and whether the project can create positive secondary economic impacts on the local economy. It is our understanding that no children will reside in the proposed mixed-use development.

The Existing Conditions, Environmental Impacts and Mitigation section begins on Page 11. Proposed Chapter 2 of the DEIS will address land use, zoning, and public policy. Public Policy considerations are outlined on Pages 12 and 13. Number 1 references *Envision Ramapo (2019)*. The *Envision Ramapo* document has not been officially submitted to this department or the public for review, nor has it been adopted. It is also our understanding that the initial focus of this comprehensive plan update is the northeast corridor area of the Town. As such, it has no relevance to the subject proposal. The other sections of the Town, including the area in which the subject parcels are located, have yet to be analyzed in *Envision Ramapo*. Reference to this document must not be cited in the proposed DEIS.

Regarding Number 3 in the same section on Page 13, we submit that it is applicable and appropriate to discuss potential amendments to the *2004 Comprehensive Plan* to accommodate the Proposed Action. As noted above, the proposed MU-3 zoning is a significant departure from the recommendations for this property contained in the *2004 Comprehensive Plan*. *Envision Ramapo* is a work in progress that does not address land use issues in Western Ramapo. Therefore, amendments to the current *2004 Ramapo Comprehensive Plan* must be simultaneously undertaken as part of the Proposed Action.

Proposed Chapter 7 will address visual and aesthetic resources, and community character. Table 3 on Page 21 contains a list of Vantage Point Locations. Two locations are noted that are within Harriman State Park. However, other trails in closer proximity to the site, have not been included in the proposed visual analysis. The Palisades Interstate Park Commission must be consulted to determine the appropriate locations for viewshed analyses of the property from hiking trails within the park system to ensure that this list is complete. In addition, the map in Figure 2 does not accurately depict the boundary for Harriman State Park, as it extends further south, abutting I-87. Locations within this section, which contains rock outcrops and peaks, must be included in the visual analysis.

Proposed Chapter 9 will evaluate historical, cultural, and archeological resources. The results of the Phase 1A/1B Archeological Study prepared for the previous "Sterling Mine Road Active Adult Community" is to be included in the DEIS. Since this document was prepared in 2005, we concur that updated studies are warranted.

Proposed Chapter 11 will analyze traffic impacts of the Proposed Action. On Page 26, the affect of the Coronavirus pandemic on traffic data collection is discussed. The impact of the pandemic on trip generation is mentioned on Page 29. The Town of Ramapo, the Rockland County Highway Department and the Town of Tuxedo must be satisfied that the proposed methodologies will provide an accurate assessment of traffic conditions related to this project.

Thank you for the opportunity to comment on the Scoping Document for the proposed zoning text and map amendments to create a new mixed-use MU-3 zoning district, as well as the site plan and lot consolidation applications required for the World Headquarters of Jehovah's Witnesses Audio/Video Production Center development proposal. If you need additional information or clarification, please contact Helen Kenny Burrows at 845-364-3453.

Sincerely,



Douglas J. Schuetz
Acting Commissioner

CC: Supervisor Michael B. Specht
United States Army Corps of Engineers
New York State Department of Environmental Conservation
Palisades Interstate Park Commission
Rockland County Highway Department
Rockland County Drainage Agency
Rockland County Health Department
Rockland County Sewer District #1
Rockland County Office of Fire and Emergency Services
Town of Tuxedo
Sloatsburg Fire District
Hillburn Fire District
Suffern Central School District
Orange & Rockland Utilities
Suez North America