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Village of Chestnut Ridge, New York (10977)  
Via: Hand Delivery  
Via email: fmandel@chestnutridgevillage.org

DR. Project No.: 11490-001  
November 12, 2020

**Re: PRELIMINARY ASSESSMENT MEMORANDUM  
DRAFT SCOPING DOCUMENT FOR PREPARATION OF A DGEIS  
VILLAGE OF CHESTNUT RIDGE DRAFT COMPREHENSIVE PLAN  
VILLAGE OF CHESTNUT RIDGE, ROCKLAND COUNTY, NEW YORK**

We are submitting this memorandum on behalf of Citizens United to Protect Our Neighborhoods of Chestnut Ridge (“CUPON CNR”), who recently retained our firm to review several ongoing planning actions in the Village of Chestnut Ridge (“Village”). The following memorandum provides a preliminary assessment and comment on the following relevant documents:

1. Village of Chestnut Ridge Draft Scope for a Preparation of a Generic Environmental Impact Statement (DGEIS) for the Draft Comprehensive Plan, dated October 14, 2020. (“DGEIS Scoping Document for the Comprehensive Plan”)
2. Village of Chestnut Ridge Comprehensive Plan (Draft) prepared for the Village of Chestnut Ridge, Rockland County, New York, prepared by Nelson, Pope & Voorhis, LLC., dated September 16, 2020. (“Comprehensive Plan”)

## **PRELIMINARY ASSESSMENT & COMMENTS**

### **1. The SEQR process should not start until the draft of the Comprehensive Plan is complete.**

The Comprehensive Plan draft still has several place holders for additional text. This includes Section 2.4 *Transportation*, which has a placeholder for text regarding the *Red Schoolhouse Road (“RSHR”) Area Traffic Study process and initial results*. Furthermore, Section 7 *Transportation Improvements and Joint Study* has a placeholder for text regarding the *joint traffic study with map of 5 projects in pipeline*. The RSHR Traffic Study is a crucial element of the Comprehensive Plan. The RSHR Traffic Study should be completed, the results should be included in the Comprehensive Plan, the Comprehensive Plan recommendations should be guided by the results, and then the DGEIS should be completed to analyze for any environmental impacts. In addition, Section 2.2.1 *Census* has a placeholder for text, there are several figures referenced in the Comprehensive Plan that are not provided, and Section 6.0 *Summary Matrix and Land Use Plan Recommendations* is blank.

### **2. Overall, the scope is vague, and the initial potential impacts identified should include more detail.**

The DGEIS Scoping Document for the Comprehensive Plan provides a brief list of potential areas of environmental impact that have been initially identified. This list includes *Zoning changes to eliminate nonconformities and promote new housing types; Land development for new multifamily and planned industry uses, impacting drainage, vegetation and wildlife; Traffic, and transportation and parking; Community character; Use of Energy*. This list represents broad issues and should be detailed further to include more specific potential environmental impacts.

Zoning changes to eliminate nonconformities and promote new housing types.

The proposed zoning changes, such as the reduction in the minimum required lot size, not only eliminate nonconformities but could also potentially allow for subdivisions creating more developable lots that may drive up the density in residential zones. This along with the other zoning recommendations to “*promote new housing types*” should be studied to determine what the overall potential density of the Village could be with a full build out permitted by the zoning changes.

Land development for new multifamily and planned industry uses, impacting drainage, vegetation and wildlife.

The *Water Protection* subsection in the *Natural Resources Inventory and Analysis* Section of the Comprehensive Plan references using a county drainage study from May of 1960, to guide needed improvements. This study, which is 60 years old, does not accurately portray the Village’s current drainage patterns as there has been significant development throughout the County over the past decades and should not be guiding future land development and/or zoning change recommendations. In addition, impacts of potential development on utilities such as water supply and sewer, along with impacts on natural resources such as surface water (aquatic life) and ground water should be studied.

Traffic, and transportation and parking.

As stated in Comment #1 of this memo, the Comprehensive Plan has a placeholder for the results of the forthcoming RSHR Traffic Study in Sections 2.4 and 7.0. The results of the RSHR Traffic Study could have a significant impact on any recommendations and subsequent environmental impacts. The Village should not be making recommendations regarding transportation and/or land development in the Comprehensive Plan that may be impacted by the results of the RSHR Traffic Study. The DGEIS also cannot fully analyze all environmental impacts until after the RSHR Traffic Study is completed.

Community character.

The Village should be studying potential impacts that the zoning recommendations to promote new housing types could have on public services such as schools, police, fire emergency services, library, recreation resources, senior resources, etc. In addition, the Village should be analyzing the tax impacts. Furthermore, visual impacts from height and building massing may negatively impact the existing small community and suburban feel.

**3. The DGEIS Scoping Document for the Comprehensive Plan mentions the adoption of a Local Waterfront Revitalization Program (“LWRP”) several times throughout the document.**

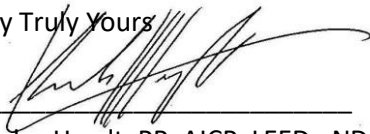
There is no mention of an LWRP in the Comprehensive Plan. Is the Village considering preparing a LWRP? The preparation of an LWRP is not included under the “*Current Village Board Actions*” page of the Village’s website. If the Village is not looking to prepare an LWRP at this time or in the near future, all references to preparing and/or adopting an LWRP should be removed from the DGEIS Scoping Document for the Comprehensive Plan. If the Village is considering potentially preparing an LWRP, this should first be included in the Comprehensive Plan.

**4. Section 3 Public Need, Benefits and Objectives of the proposed DGEIS should discuss the community's response to the SWOT analysis and survey questions presented in the Comprehensive Plan.**

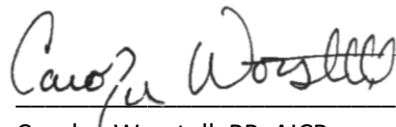
The public workshops during the preparation of the Comprehensive Plan including a SWOT analysis and survey presented to the community. The DGEIS Scoping Document for the Comprehensive Plan should include an analysis of the community's response and how that relates to the Village's Vision, Goals and Objectives, and Recommendations in the Comprehensive Plan.

We reserve the right to provide additional comments on the Draft Generic Environmental Impact Statement (DGEIS) and the Draft Comprehensive Plan at a later date.

Very Truly Yours



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Director of Planning



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cc: Steven N. Mogel, Esq.

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