

DRESDNER ROBIN

PLANNING AND ZONING REPORT

VILLAGE OF CHESTNUT RIDGE

COMPREHENSIVE PLAN ANALYSIS

CHESTNUT RIDGE, ROCKLAND COUNTY, NEW YORK

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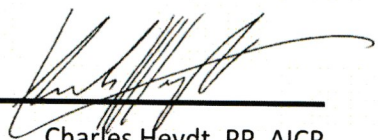
PREPARED FOR
Citizens United to Protect Our Neighborhoods
PO Box 394
Nanuet, NY 10954

PREPARED BY
Dresdner Robin
One Evertrust Plaza, Suite 901
Jersey City, NJ 07302

DATE
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Carolyn Worstell, PP, AICP
Senior Planner
NJ Lic. # 33LI00645000



Charles Heydt, PP, AICP
Professional Planner
NJ Lic. # 33LI00621100

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1.0 INTRODUCTION

This Planning and Zoning Report (“Report”) has been prepared to analyze the Village of Chestnut Ridge Draft Comprehensive Plan (“Draft Comprehensive Plan”) prepared by Nelson, Pope & Voorhis.

The following material has been reviewed in preparation of this Report:

1. Village of Chestnut Ridge Draft Comprehensive Plan, prepared for the Village of Chestnut Ridge, Rockland County, New York, prepared by Nelson, Pope & Voorhis, LLC., dated August 11, 2021.
2. Village of Chestnut Ridge Draft Comprehensive Plan, prepared for the Village of Chestnut Ridge, Rockland County, New York, prepared by Nelson, Pope & Voorhis, LLC., dated September 16, 2020.
3. New York State Zoning and the Comprehensive Plan, dated 2015.
4. PAS Report 578 Sustaining Places: Best Practices for Comprehensive Plans, prepared for American Planning Association, prepared by David R. Godschalk and David C. Rouse, dated January 2015.

Our Report reviews the Draft Comprehensive Plan against the recommended topics to be covered under the New York Village Law §7-772 and provides comments and recommendations based on our preliminary assessment of the Draft Comprehensive Plan and a review of the American Planning Association best practices for comprehensive plans (“APA Best Practices”).

2.0 BACKGROUND TO PRESENTLY PROPOSED COMPREHENSIVE PLAN

The Village of Chestnut Ridge (“Village”) has undertaken the process to develop the first Comprehensive Plan of the Village. The Comprehensive Plan states,

“[t]he overall goal of this project is to provide the first Comprehensive Plan for the Village of Chestnut Ridge, supporting the Village’s Zoning Code and Land Use Policies for the next ten years.”

During the comprehensive plan process the Village is also conducting the Red Schoolhouse Road Area Traffic Study (“RSHR Traffic Study”), and is also considering a zoning text and map amendment that would create a Planned Unit Development floating overlay zone (“PUD Zone”) for the proposed Equestrian Estates development. As part of the adoption process, the Village is also undertaking a State Environmental Quality Review Act (“SEQRA”) review, including the preparation of a Generic Environmental Impact Statement (“GEIS”), which will assess the environmental impacts of the proposed recommendations of the Comprehensive Plan.

2.1 Comprehensive Plan Process

The Comprehensive Planning process started back in 2019, with a land use reconnaissance and mapping of existing conditions (Task 1), various meetings with the Village Board of Trustees and other community agencies (Tasks 2 & 4), public involvement (Task 3), and development of

land use concepts, strategies and zoning amendments and the completion of the Red Schoolhouse Road Traffic Study (Task 5) which was completed in February of 2021.

The last and final task of the process (Task 6) is the completion of a Draft Comprehensive Plan and SEQR analysis. The Draft Comprehensive Plan indicates that this task was “completed in the fall of 2021”. However, to our knowledge no Draft Generic Environmental Impact Statement (DGEIS) for the Draft Comprehensive Plan has been prepared or made available to the public for review. This is a required step of the process that has statutory requirements for public notice, review and public hearing that must be completed before a comprehensive plan can be adopted by the Village.

The Draft Comprehensive Plan should be updated to include the anticipated timeframe for the completion of the DGEIS and the timeline for completion of the SEQR process.

Concurrent to the adoption of the first Village Comprehensive Plan is an effort to adopt a new PUD Floating Zone for the Equestrian Estates Development. Recommended best planning practices would be for the Village to first act on the Comprehensive Plan, which is intended to provide a broad plan for the future growth of the Village and serve as the foundation to any subsequent specific recommendations and zoning modifications. Any zoning text and map amendment, which may have site specific applications (i.e. the proposed Equestrian Estates PUD Zone), should come thereafter. A proposed development application utilizing the zoning text and map amendment should be the final step in the process.

3.0 NEW YORK ZONING AND THE COMPREHENSIVE PLAN

The New York Village Law §7-722 (“Village Law”) encourages but does not require the preparation and adoption of a comprehensive plan. The Village Law recognizes that village comprehensive planning can be used to regulate land use for the purpose of protecting the public health, safety, and general welfare. The Village Law does not have any requirements for what a comprehensive plan must include, instead it has a recommended list of topics that a village comprehensive plan may include at the level of detail adapted to the special requirements of the village.

The list of topics includes:

- (a) *General statements of goals, objectives, principles, policies, and standards upon which proposals for the immediate and long-range enhancement, growth and development of the village are based.*
- (b) *Consideration of regional needs and the official plans of other government units and agencies within the region.*
- (c) *The existing and proposed location and intensity of land uses.*

- (d) *Consideration of agricultural uses, historic and cultural resources, coastal and natural resources and sensitive environmental areas.*
- (e) *Consideration of population, demographic and socio-economic trends and future projections.*
- (f) *The location and types of transportation facilities.*
- (g) *Existing and proposed general location of public and private utilities and infrastructure.*
- (h) *Existing housing resources and future housing needs, including affordable housing.*
- (i) *The present and future general location of educational and cultural facilities, historic sites, health facilities and facilities for emergency services.*
- (j) *Existing and proposed recreation facilities and parkland.*
- (k) *The present and potential future general location of commercial and industrial facilities.*
- (l) *Specific policies and strategies for improving the local economy in coordination with other plan topics.*
- (m) *Proposed measures, programs, devices, and instruments to implement the goals and objectives of the various topics within the comprehensive plan.*
- (n) *All or part of the plan of another public agency.*
- (o) *Any and all other items which are consistent with the orderly growth and development of the village.*

There are several recommended topics that the Draft Comprehensive Plan either does not address thoroughly enough or does not address at all. These topics are related to housing, circulation, infrastructure, environment, etc. In addition, the Draft Comprehensive Plan does not address future projections or coordination with adjacent municipalities.

4.0 PRELIMINARY ASSESSMENT OF THE DRAFT COMPREHENSIVE PLAN

The following provides our comments and recommendations based on our preliminary assessment of the August 2021 Draft Village of Chestnut Ridge Comprehensive Plan ("Draft Comprehensive Plan").

- 1. The Existing Conditions Section of the Draft Comprehensive Plan includes a limited inventory on the existing conditions and almost non-existing analysis on the impacts of the existing conditions on the current issues and implications for future growth of the Village.**

As this is the first Comprehensive Plan of the Village, the Existing Conditions section should include a detailed and thorough inventory and analysis of the conditions and assets of the Village.

Demographics:

The Demographic section focuses on existing conditions but does not include any projections for future growth of the Village, which is recommended under Village Law. How the Village anticipates growing over the next 5 to 10 years is key to directing the future “vision” for the Village.

Housing:

The Draft Comprehensive Plan indicates that 42% of renters face a severe cost burden (more than 50% of income dedicated to housing), but also 20% of homeowners face a severe cost burden. The Draft Comprehensive Plan does not analyze the issues of housing affordability for homeowners and renters in the Village or future housing needs, which is recommended under Village Law.

Income and Poverty:

The Draft Comprehensive Plan indicates that household income has declined and the share of households receiving food assistance benefits has grown over the past decade. The Draft Comprehensive Plan does not analyze the issue of income or poverty for its residents, which is recommended under Village Law.

Land Use and Zoning

Analysis of Variances Granted:

The Draft Comprehensive Plan only identifies undersized lots as an issue with the current zoning code, indicating that 58% of all residential lots are undersized for the zoning district they are located within. The Draft Comprehensive Plan does not include any analysis of the types of other variances commonly granted by the Village Zoning Board of Appeals and whether they relate directly to the lot size issue or if there are other issues with the current zoning code and bulk standards of the Village.

House of Worship Amendments:

The Village recently adopted revisions to the zoning code to accommodate houses of worship throughout the Village. The intent of the amendments was to allow these uses within residential neighborhoods without the need for variances. Several applications have been recently approved or are under consideration which require several bulk variances from the recently amended zoning ordinance. The Draft Comprehensive Plan does not include an analysis of the recent projects and the effectiveness of the amendments to meet the goal of the Village for allowing these uses to be integrated throughout the Village while balancing the desires of the surrounding neighbors to minimize negative impacts.

Natural Resources:

The Draft Comprehensive Plan includes a brief inventory of the natural resources of the Village including topography and soils, geology, surface water, ground water, flood zones and wetlands, stormwater management, water supply, water protection, endangered wildlife and plants, critical environmental areas, and brownfields. The Draft Comprehensive Plan includes no analysis of the importance of any of these resources to the Village or the impacts of existing development on the resources, which is recommended under Village Law.

Historic Setting:

The Draft Comprehensive Plan references how the older homes, buildings and landscapes within the Village contribute to the “unique character and sense of place”. However, the “inventory” of the structures and landscapes that contribute to this “character” is limited to two local sites, a historical marker and a county study with unpublished maps. Further, the Draft Comprehensive Plan does not include an analysis of the status of these contributing “structures” or “landscapes” and whether the current ordinances and zoning protects the historic character of the Village.

Community Services and Facilities:

The Draft Comprehensive Plan includes only a bullet-pointed “inventory” of the assets of the Village and does not assess the adequacy of these services or facilities for the current or future needs, which is recommended under Village Law.

Transportation:

The Draft Comprehensive Plan limits its inventory and analysis of the transportation infrastructure of the Village to the Red School House Road Traffic Study. There is no inventory or analysis of the roads or other transportation infrastructure outside of this small corridor of the Village, which is recommended under Village Law. Only two sentences are dedicated to “pedestrian facilities outside the Red Schoolhouse Road Corridor” with no inventory of existing sidewalks or analysis of the need or siting of sidewalks.

Retail and Services Market Conditions:

The Draft Comprehensive Plan relies on a traditional retail market leakages and surplus study which does not address the ongoing changes to the retail marketplace where increasingly consumers are purchasing goods online for delivery to their homes. The existing conditions analysis within the Draft Comprehensive Plan only identifies one potential new use “restaurant/drinking establishment/entertainment venue” within the Red Schoolhouse Road study area and does not assess opportunities outside of this corridor.

2. The Comprehensive Plan provides no context to connect the “Vision Statement”, goals, objectives and recommendations of the plan to the results of the community outreach efforts or the inventory of existing conditions.

The Draft Comprehensive Plan includes a vision statement along with goals and objectives to serve as a framework for policy recommendations in the Comprehensive Plan. The vision statement sets the tone for the goals and objectives of the Draft Comprehensive Plan and the vision for all future development of the Village. The Chestnut Ridge Draft Comprehensive Plan vision statement can be broken down into several key components:

1. “Orderly and attractive community which provides economic development opportunities, a variety of housing options, and diversity in its population.”
2. “Collector roads will become more pedestrian and bicycle friendly considering the needs of citizens of all ages and abilities.”
3. “Architectural Standards will be enhanced to reflect the Village’s historic identity and a unique sense of place.”
4. “In established residential areas, lower densities of single-family residential uses will dominate.”
5. “Existing institutional uses will be allowed to develop housing for their staff and special needs clients.”
6. “The Village’s wooded character will be preserved and enhanced.”
7. “Significant future development will be focused on the Red Schoolhouse Road corridor, and along Chestnut Ridge Road and....South of the Garden State Parkway extension, options will be expanded to encourage high-quality development consistent with the range of uses permissible north of the Parkway extension and the types of uses developing in the adjacent Borough of Montvale.”

The vision statement, goals and objectives are meant to represent a consensus of the vision of the community that was developed from the visioning workshop strength, weaknesses, opportunities, threats (“SWOT”) exercise and written survey on potential Comprehensive Plan recommendations. Several of the proposed goals, objectives and recommendations included in the Plan directly contradict the results of community outreach efforts, with no context for how the Plan reached the final “vision” for the Village. Furthermore, there are several components of the “Vision Statement” which are insubstantially addressed in the goals and objectives of the Draft Comprehensive Plan; and several goals and objectives which do not have related recommendations for implementation.

3. The Draft Comprehensive Plan does not provide a complete inventory and assessment of key infrastructure assets including, but not limited to, roads, bridges, sewer, etc.

The Draft Comprehensive Plan did not provide an inventory and assessment on infrastructure within the Village. Infrastructure such as roads, bridges, sewer lines, etc. are major assets to the Village. The Comprehensive Plan should include a complete inventory of existing infrastructure. The Comprehensive Plan should further assess the conditions of the current infrastructure within the Village. Providing a full assessment would help the Village determine if improvements are required to existing infrastructure and/or if additional infrastructure is needed to support the development envisioned by the Draft Comprehensive Plan. Further, an inventory and assessment on infrastructure could help guide the goals, objectives and recommendations of the Comprehensive Plan.

4. The 1960 county drainage study should be supplemented and/or replaced altogether as it is over 60 years old and it does not account for substantial changes related to development, natural resources, etc.

The Water Protection (§2.4.8) of the Draft Comprehensive Plan states,

*“Chestnut Ridge, like other surrounding municipalities, regulates development in and around its wetlands and water courses. Village Subdivision Regulations requires the Village Engineering Consultant to study the effect of each subdivision on existing downstream drainage facilities outside the area of the subdivision. **The county drainage study of May 1960**, together with other studies as shall be appropriate, shall serve as a guide to needed improvements.” [Emphasis added]*

The above indicates that the Village is relying on a county drainage study from 1960, over 60 years ago, as a basis for analyzing the effect on drainage facilities from subdivisions and subsequent development. It is highly likely that the Village has seen substantial changes over the last 60 years related to development, natural resources, etc. that would considerably influence the results of a drainage study. Impacts from climate change over the last 60 years alone would considerably impact the outcomes from a drainage study. It is our recommendation that a new drainage study should be undertaken by the Village to supplement and/or replace altogether the 1960 drainage study. The results from an up-to-date drainage study would be a great tool for guiding goals, objectives, and recommendations of a comprehensive plan. In addition, a current drainage study could set the framework for a resiliency section that can and should be incorporated into the new Village Comprehensive Plan. Additional comments regarding our recommendation to add a resiliency section to the Comprehensive Plan can be found below.

5. The Village should strongly consider adding a resiliency section to the Comprehensive Plan to assess potential climate change related risks and guide policies to mitigate impacts.

It is our recommendation that the Village should add a resilience section to the Comprehensive Plan. A key component would be providing climate-related vulnerability hazard assessments. By assessing climate-related vulnerability hazard the Village can set goals and objectives that will reduce the susceptibility of the Village to climate threats. Climate change can have devastating impacts to public health, safety, and the general welfare of a community. Assessing potential risks of the Village to climate change can set a framework for guiding policies that can support resiliency. These policies can also help guide recommendations that are to be included in the Village Comprehensive Plan.

6. Specific recommendations to address the current impairment to the Pascack Brook and to promote goals and objectives related to the conservation of water resources should be included in the Comprehensive Plan.

The Pascack Brook is one of the two sub-watersheds within the two watersheds for which all of the land in the Village is located. The Pascack Brook is also one of the three streams within the Village. According to the Existing Conditions – Inventory and Assessment, the Pascack Brook and its tributaries and Pine Brook are impaired based on the latest Water Quality Assessment Reports for the years 2012 and 2014. The Pascack Brook is also identified as impaired on the 2018 Water Quality Assessment Report. It should also be noted that the Pascack Brook is the only county-regulated stream located within the boundary of the Village. The Surface Water (§2.4.3) of the Draft Comprehensive Plan states,

*“Water in the streams and wetlands occurring in the Village is derived from precipitation runoff and natural ground-water discharge (“base flow”). **As such, local land use can affect the quantity and quality of water in these resources.**” [Emphasis added]*

It is further stated within the Water Quality Sampling (§2.4.3) of the Draft Comprehensive Plan that,

“Overview Aquatic life and recreational uses in Pascack Brook are impaired by unspecified pollutants attributed to municipal/industrial inputs and urban/stormwater runoff.”

Given the current impairment to the Pascack Brook, which again is a county-regulated stream, it is further evident that 1960 county drainage study is not appropriate for assessing impacts from development. In addition, the Village should be considering specific recommendations to address the current impairment, while also closely analyzing land use recommendations that may have a further impact on the impairment of Pascack Brook.

The Water Supply (§2.4.7) of the Draft Comprehensive Plan states that Village is primarily served by wells and surface water resources. In addition, it is recognized that wells derive its supply from ground-water resources in the Village and as such can potentially be impacted by local changes in recharge and water quality. Furthermore, it is stated,

"As such, hydrologic and land use changes which affect recharge mechanisms available to these sources can impact the quantity of supply available. Given this relationship, the potential impacts of current zoning and future land use changes on ground-water recharge should be considered relative to Village land use ordinances. Specifically, ordinances geared towards maintaining and/or enhancing ground-water recharge (i.e., 0% loss of recharge) should be considered."

The Draft Comprehensive Plan does include in §5.2.1 Land Use as an objective to,

"Protect environmentally stream ecosystems and floodplains, including Hungry Hollow Brook, Pine Brook, and Pascack Brook, and maintain adequate buffers between these systems and adjoining development."

As stated in the Draft Comprehensive Plan, a goal is generally a broad aspiration, an objective is more narrowly defined and can be objectively measured, and goals and objectives will be basis for the policy recommendation of the Comprehensive Plan. The Comprehensive Plan does not have clear recommendations to address the specific impairment to the Pascack Brook, or to advance the goals and objectives related to the conservation of water resources.

- 7. The entire Village, beyond just the Red Schoolhouse Road and Chestnut Ridge Road corridors, should be assessed to analyze where high-density residential and/or mixed-use development would be appropriate.**

The Draft Comprehensive Plan focuses almost exclusively on the Red Schoolhouse Road corridor and Chestnut Ridge Road corridors. The Draft Comprehensive Plan includes *Map 7: Parcels with Development Potential for Multifamily Use Classified by Existing Land Use* ("Map 7"). Map 7 is not referenced in the Draft Comprehensive Plan text. Map 7 identifies parcels throughout the Village that have development potential for multi-family uses. The Village should further analyze the parcels outside the Red Schoolhouse Road and Chestnut Ridge Road corridors. Other parcels may be more appropriate for multi-family uses than the Red Schoolhouse Road and Chestnut Ridge Road corridors. The findings of a more thorough analysis of all of the parcels identified in Map 7 may support goals, objectives, and recommendations for the Comprehensive Plan.

8. The recommendation to create a PUD Floating Zone should be reassessed to determine if the identified location is the most appropriate for a higher-density, mixed-use development given the concerns of the community.

One of the recommendations of the Comprehensive Plan is to create the PUD Zone, within areas one-half mile of the Garden State Parkway (“GSP”) interchange. The PUD Zone would permit mixed-use developments with multifamily residential densities integrated with commercial and office projects. This rezoning recommendation is inconsistent with several of the responses from the community in the Comprehensive Plan survey including,

- *“Respondents did not support allowing for higher density housing types such as duplexes, townhomes, or apartments.”*
- *“Respondents did not support allowing multifamily apartments or townhomes in the Red Schoolhouse Road/GSP interchange area.”*
- *“Respondents generally did not support any of the photo images of multifamily dwellings.”*
- *“46% of respondents wished to discourage a mixed-use pattern anywhere in the village.”*

Engaging the community to participate in the development of a Comprehensive Plan is a crucial step in the Comprehensive Planning process. The vision, goals, objectives and recommendations should also be consistent with the vision of the community. Based on our assessment it appears there is disconnect between the vision of the community and the recommendation to create a PUD floating zone, with no context provided as how the two can be reconciled. As stated in comment number 7 above, the entire Village should be assessed for determining appropriate locations for higher-density, mixed-use development. There may be alternative locations in the Village where a high-density, mixed-use development is particularly suited to balance the vision of the Village with the concerns of the community.

9. The Draft Comprehensive Plan should provide an assessment to identify the root causes of identified issues, which can help determine appropriate recommendations, such as zoning text amendments, to address such issues.

The Comprehensive Plan does not provide further discussion or recommendations to address several weaknesses, opportunities, and threats identified in the community the SWOT analysis.

The weaknesses include:

- *“Lack of zoning enforcement, poor property maintenance, parking enforcement problems, illegal rentals and conversions.”*
- *“Outdated or inadequate zoning codes.”*

- *“Lack of Government transparency and communication, inadequate website and follow-through.”*

The opportunities include:

- *“Improve zoning ordinances, make realistic/fair.”*
- *“Curtail/regulate urbanization to specific areas.”*

Along with the recommendation to create a PUD Zone, the Draft Comprehensive Plan recommends several zoning map amendments that would rezone areas in the Village. The majority of the rezoning recommendations would address the issue of non-conforming lot sizes. Other rezoning recommendations would combine or create new zones (e.g. a new PILO District). The Comprehensive Plan does not include any detailed discussion of the impacts of these rezoning efforts or include recommendations for new bulk standards where new zones would be created.

Furthermore, while these recommendations may be effective in encouraging development; however, this would not likely address any issues with the existing zoning code. The Village should further assess and consider zoning text amendments that would improve any outdated or inadequate zoning standards and also look closely to see what issues are causing the lack of zoning enforcement, poor property maintenance, parking enforcement problems, illegal rentals and conversions. It is important to discover the root of these issues in order to determine if zoning text amendments can be made to address these issues.

10. The recently enacted standards for residential gathering and places of worship in residential neighborhoods should be more thoroughly discussed, specifically as to balancing the potential negative impacts to neighbors and the right of citizens to establish these uses.

The Village should be proactive in addressing any issues that may arise from religious use requirements. It is important the Village thoroughly assesses the balance of the potential impacts to neighbors in the residential district and the right of citizens to establish residential gathering and places of worship uses. The Comprehensive Plan does not recommend any changes to the house of worship standards, other than removing allowances for undersized lots. Based on our understanding there has been several houses of worship applications that required multiple variances. The Comprehensive Plan should thoroughly analyze the recently enacted standards to determine why there has been a need for multiple variances on the house of worship applications. Specific recommendations should then be included in the Comprehensive Plan to address the issues.

5.0 AMERICAN PLANNING ASSOCIATION BEST PRACTICES FOR COMPREHENSIVE PLANS

The APA also has recommended best practices that can be used to evaluate Comprehensive Plans. The APA Best Practices report established plan standards consisting of six principles, two processes, and two attributes.

Recommended Principles

1. *Livable Built Environment: Ensure that all elements of the built environment, including land use, transportation, housing, energy, and infrastructure, work together to provide sustainable, green places for living, working, and recreation, with a high quality of life."*
2. *Harmony with Nature: Ensure that the contributions of natural resources to human well-being are explicitly recognized and valued and that maintaining their health is a primary objective.*
3. *Resilient Economy: Ensure that the community is prepared to deal with both positive and negative changes in its economic health and to initiate sustainable urban development and redevelopment strategies that foster green business growth and build reliance on local assets.*
4. *Interwoven Equity: Ensure fairness and equity in providing for the housing, services, health, safety, and livelihood needs of all citizens and groups.*
5. *Healthy Community: Ensure that public health needs are recognized and addressed through provisions for healthy foods, physical activity, access to recreation, health care, environmental justice, and safe neighborhoods.*
6. *Responsible Regionalism: Ensure that all local proposals account for, connect with, and support the plans of adjacent jurisdictions and the surrounding region.*

Recommended Processes

7. *Authentic Participation: Ensure that the planning process actively involves all segments of the community in analyzing issues, generating visions, developing plans, and monitoring outcomes.*
8. *Accountable Implementation: Ensure that responsibilities for carrying out the plan are clearly stated, along with metrics for evaluating progress in achieving desired outcomes.*

Recommended Attributes

9. *Consistent Content: Ensure that the plan contains a consistent set of visions, goals, policies, objectives, and actions that are based on evidence about community conditions, major issues, and impacts.*
10. *Coordinated Characteristics: Ensure that the plan includes creative and innovative strategies and recommendations and coordinates them internally with each other, vertically with federal and state requirements, and horizontally with plans of adjacent jurisdictions.*

6.0 RECOMMENDATIONS FOR CONSISTENCY WITH APA BEST PRACTICES

As stated in Section 5.0 of this report, the APA has established best practices that can be used to evaluate comprehensive plans. Based on our review, the Draft Comprehensive Plan can be improved to include and/or further address several of the APA Best Practices.

Specifically, the Draft Comprehensive Plan can be improved to further address the *Authentic Participation* required process of the APA Best Practices. Section 4.0 of this report identifies several inconsistencies between the communities Strength, Weakness, Opportunity and Threat (“SWOT”) analysis and survey responses and the Vision, Goals and Objectives developed by the Village in the Draft Comprehensive Plan. The inconsistencies are likely due to a disconnect between the vision of the community and the vision of the Village. The community should also be involved in *generating visions, developing plans, and monitoring outcomes*. The community participation process needs to be expanded to close the gap between the responses of the community and the vision, goals and objectives, and recommendations provided in the Draft Comprehensive Plan. This would also promote the APA Best Practices of *Consistent Content* as a required attribute. The Draft Comprehensive Plan can also be improved to include the *Accountable Implementation* required process of the APA Best Practices. The Draft Comprehensive Plan should include *metrics for evaluating progress in achieving desired outcomes*.

The Draft Comprehensive Plan provides little to no consideration on how the proposed recommendations will impact the adjacent communities. The APA Best Practices include *Coordinated Characteristics* as a required attribute. The Draft Comprehensive Plan should identify the relationship with other plans in adjacent communities, the county, the state, etc. The recommended zoning map amendments would likely impact the adjacent communities. The recommended PUD Zone would be directly adjacent to or near the border of the Village and the Borough of Montville, New Jersey, and the Town of Orangetown, New York. These impacts should be identified in the Draft Comprehensive Plan along with mitigation strategies.

7.0 CONCLUSION STATEMENT

Based on our preliminary assessment of the Draft Comprehensive Plan there are several comments and suggestions that we recommend the Village consider. We provided comments and recommendations specific to the limited inventory and analysis on the existing conditions of the Village, the inconsistencies between the goals, objectives, recommendations, and vision statement. In addition, we provided comments on the use of significantly outdated county drainage study, exclusion of a resiliency section, and lack of recommendations to address impairment to the Pascack Brook and other water sources. Furthermore, we included recommendations to reassess the recommendation to create a PUD and encourage higher-density residential, address all identified

issues by the community, and more thoroughly discuss and analyze potential negative impacts from residential gathering and places of worship in residential neighborhoods.

We reserve the right to provide additional comments on the Draft Comprehensive Plan at a later date.

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