

DEPARTMENT OF PLANNING

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July 14, 2026

Hon. Michael B. Specht
Supervisor
Town of Ramapo Town Board
237 Route 59
Suffern, NY 10901

RE: Carlton Road PUD - 109 College Road – Draft Scoping Document

To Supervisor Michael Specht and the Town of Ramapo Town Board members:

As an on-going interested party for the State Environmental Quality Review Act (SEQRA) process, our department has reviewed the Draft Scoping Document for the above referenced proposal, with a date of June 10, 2026. The purpose of the Scoping Document is to identify the issues to be addressed in the Draft Environmental Impact Statement (DEIS) to rezone two lots comprising a total of 43.65 acres in the RR-50 zoning district to establish the Carlton Road Planned Unit Development (CR-PUD). This proposal will involve site plan approvals for the construction of a mixed-use development, which will include a total of 562 dwelling units, with a range of one to four bedrooms; 105,600 square feet of commercial, retail, and office space within two commercial buildings; two clubhouses and a community center; 1,550 parking spaces; and three parks with amenities for active and passive recreation. The project will be constructed in two phases. An amendment to the Town's Comprehensive Plan will also be required. The project is to be developed in accordance with Local Law 3 of 2025, which was adopted to allow PUDs for flexible development on sites of at least 10 acres outside of the Northeast Area of the Town.

After a review of the document, we have the following comments:

1. The project requires an amendment to the Town's Comprehensive Plan, which would designate the site suitable for higher density, mixed-use development. The adopted Ramapo 2004 Comprehensive Plan, Future Land Use section, currently recommends

that properties within the RR-50 zoning district retain their existing zoning designation. In addition, this Chapter designates properties along the North side of Carlton Road and west of College Road to be used for cluster development, which creates a reduced development footprint. Chapter 17, Alternatives, Section D of the DEIS should consider an alternative layout that incorporates cluster-type development, which would help to satisfy the original intention of the Town's Comprehensive Plan to preserve open space.

2. The proposed Comprehensive Plan amendment will affect three chapters of the 2004 plan. However, the Town has also initiated the process of updating its Comprehensive Plan with an entirely new document. Chapter 2, Land Use, Zoning, and Public Policy should acknowledge that an update of the Comprehensive Plan is in the process of being developed. The Town shall incorporate these chapter amendments into the updated plan.
3. Chapter 2, Section D1 references the Rockland County Tomorrow: Rockland County Comprehensive Plan (2011). The County is currently in the process of finalizing an update of its comprehensive plan for adoption, which will supersede the 2011 plan. The Scoping Document should refer to the June 2026 Final Draft Envision Rockland Comprehensive Plan, which is made available to the public at <https://www.envisionrockland.com/>.
4. The base zoning district of the site is RR-50, which permits a residential density much lower than the needs of the developer. Environmental impacts, particularly those related to loss of trees, loss of green space and an increase in impervious surface, should be carefully assessed based on such significant density. Chapter 2, Section C should compare the bulk and parking standards not only to the base zoning district of the property, but also to the surrounding higher density zoning districts of R-35 and R-25. The proposed bulk standards should also be compared to those used for other PUDs that have been previously approved by the Town Board. A set of bulk standards similarly used for other PUDs should be considered as an alternative for this project to satisfy the goals of not only increasing density but also reducing the environmental impact of the development.
5. Chapter 3, Visual and Community Character, indicates potential impacts, including increased light and sound. Mitigation measures, such as the preservation of existing mature trees, should be considered to not only reduce the loss of natural vegetation but also diminish the impact of the development on the immediately adjoining properties.
6. In addition, Chapter 3, Section B describes prominent views into the project site from West Carlton Road and College Road. The proposal will comprise multiple buildings constructed at a maximum height of 65 feet, with an area of disturbance that occupies almost the entirety of the site. The visual analysis of this development should also

account for other properties in vicinity of this site. This analysis must include nearby public resources such as Warren E. Berbit Nature Preserve, Rockland Community College, and Pete Erickson County Park.

7. A Biological Inventory and Assessment should be part of the DEIS and include Identification, mapping and analysis of both plant and animal species and habitat types located on and immediately adjacent to the Project Site and the impacts to such resources should be done through field investigation and field verification. The inventory should include an assessment of habitat loss on wildlife particularly bird species.
8. While the applicant has pre-determined that no essential habitats for federally or state designated threatened or endangered species are on the Project Site; the site does contain compatible habitat for the box turtle, a New York State “species of special concern.” The types and populations of wildlife should be assessed through field studies and habitat loss, and loss of wildlife based on the proposed project should be documented. A field based and verified biological inventory of the site should include an assessment of habitat loss on wildlife particularly box turtle habitat. Mitigation measures to minimize habitat and loss of plant and animal life must be included in the scope of the DEIS. The scope should include an assessment of lighting impacts on wildlife, particularly bird species.
9. Construction will require the clearing of approximately 45 acres of forested and vegetated land from an almost entirely wooded site. A detailed tree inventory must be undertaken as part of the scope to measure and assess the loss of these forested areas. The analysis should include species type, age, trunk size and height. Mature trees and mature forested areas remove, absorb and store carbon in wood, leaves, and the soil. When trees and forests are cleared, that carbon is lost. New York’s recently adopted Scoping Plan, required as part of The Climate Leadership and Community Protection Act, calls for protecting the ability of forests to serve as carbon sinks and calls for promoting the most effective methods of increasing New York’s carbon sequestration, storage, and climate resilience. The scope should include a carbon analysis to determine the carbon and carbon sink lost from forest and tree removal. The impacts of this tree clearance must be further addressed in Chapter 6, Ecological Resources.
10. Chapter 6, Section E lists Mitigation Measures, potentially including landscaping, tree replacement, and recreational elements. This section must be expanded upon to include additional mitigation measures such as a tree preservation plan, demonstrating an attempt to preserve larger, healthy mature trees.
11. Protecting Rockland County’s water supply from contaminants is of tantamount importance. Proper lawn and turf management is important to eliminate the harmful effects of fertilizers and pesticides that can find their way into open water, streams

and the water supply. The DEIS must explore mitigation measures to reduce if not eliminate the use of harmful pesticides and fertilizers. Likewise, landscaping should be designed in a sustainable fashion that minimizes the use of water.

12. Chapter 6 and the November 6, 2024, letter from Ecological Analysis LLC state that there are no wetlands on or within 500 feet of the site. This is furthermore emphasized in Part F of the Draft Scoping Document, where it is stated that impacts to wetlands do not require further analysis in the DEIS since no wetlands were identified on or within 500 feet of the project site. However, the NYSDEC Environmental Resources Mapper (<https://giservices.dec.ny.gov/gis/erm/>) shows informational Freshwater Wetland Mapping encroaching into the site and on adjacent properties, on in the northeast section of Parcel 49.17-1-76, which is indicative of potential wetlands in proximity to the proposed development. The scope should include a review of wetlands and field verification that no freshwater wetlands will be impacted by the proposed project. Field verification should also be used to determine if any on-site regulated wetlands require a jurisdictional determination by the NYSDEC.
13. Solid waste and recycling is addressed as part of Chapter 8, Section F. The analysis should be broadened to address material optimization, waste reduction and minimization, not just the waste disposal part of the equation. It should include construction material optimization and waste minimization as well as recycling construction debris. The transportation and disposal of solid waste have broad and far-reaching environmental impacts. The overall assessment should take into account the broader impacts of solid waste disposal including transport and climate impacts.
14. Chapter 8, Community Facilities, Subsection G provides an analysis of the impact of the development on public schools. This analysis is limited to public school enrollment and does not address the fiscal impact of providing auxiliary services to private school students or the environmental impacts of providing transportation for them. The fiscal and environmental impacts that result from private school enrollment must also be analyzed.
15. Chapter 9, Water and Wastewater, Section E should review and identify water saving/water conservation and water efficiency measures, such as graywater recapturing systems, to reduce both the demand for water and wastewater to be consistent with County's Water Conservation Plan.
16. Chapter 12 concerns Traffic impacts from the proposal. This chapter must address the impacts that increased residential density will have on existing public transportation routes, school bus services, pedestrian safety, and response times for emergency services. Transportation of Rockland (TOR) has several bus routes that operate in proximity to the site, with TOR Routes 59 and 94 and Loop 3 running directly along College Road, where two driveways for this development are proposed.

17. This project will result in an increase in traffic. Chapter 13, Air Quality indicates that a Mobile Source Analysis will be conducted for impacts to Carbon Monoxide and Particulate Matter. All of Rockland County is a non-attainment area for 8-Hour Ozone (2015) demonstrated by frequent air quality alerts. Ground-level ozone, caused by the chemical reaction of oxides of nitrogen and volatile organic compounds, is harmful to human health and the environment. One of the sources of these pollutants is automobiles. A Mobile Source Analysis should include all criteria pollutants carbon dioxide, particulate matter (PM_{2.5} and PM₁₀), non-methane organic gases and oxides of nitrogen, particularly NO_x. It is recommended that this analysis also includes Mobile Source Air Toxics (MSATs) such as benzene, formaldehyde, and diesel particulate matter. Potential air quality impacts caused by an increase in traffic should be assessed and mitigated to make sure the increase in automobile use does not result in exacerbating existing air quality and ozone problems.
18. It is recommended that Chapter 17, Alternatives, also include an 'Alternate Design' that demonstrates reduced environmental impacts through a reduced building program. This should include a reduction in the number of dwelling units, a reduction in density, less impervious surface and a tree preservation program.
19. Despite recent changes, New York has one of the strongest climate laws that set a goal of reducing greenhouse gas emissions by 85% from 1990 levels by 2050. We recommend that the scope include an analysis of the loss of carbon due to the loss of trees and increased energy use and traffic, as well as providing a tabulation of the productions greenhouse gas (GHG) emissions and potential climate impacts. Mitigation measures to reduce the production of GHG emissions and minimize climate impacts should be identified.
20. Being there are other proposed development projects adjacent and near this site, the scope of the DEIS should encompass and include in its analysis of traffic, air quality and water resources the cumulative impacts of other proposed projects such as the development application for parcel no. 49.13-2-9.1.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Douglas J. Schuetz".

Douglas J. Schuetz
Commissioner of Planning

Rockland County Department of Health
Rockland County Drainage Agency
Rockland County Highway Department
Rockland County Public Transportation
Ramapo Community Design Review Committee (CDRC)