

3.7.5 Cultural Resources Comments and Responses

Comment 3.7-1: (Letter 1, John Furst, June 10, 2015): The higher density development proposed with the annexation will negatively impact the Town of Woodbury's community character and the public facilities that serve its residents. The Town's rural suburban disposition in the area adjacent to the lands to be annexed will now abut high density urban-like developments that will increase traffic and noise impacts and completely change the view shed of that portion of the Town of Woodbury. In addition, the expansion of the Village of Kiryas Joel will place a strain on the County's ability to properly treat the wastewater for those areas of the Town that share the same wastewater treatment facility as the Village of Kiryas Joel.

Response 3.7-1: The visual character of the local area (the "view shed") will change under either the annexation or no annexation scenarios. However, the lands that abut the Town/Village of Woodbury are currently zoned UR-M by the Town of Monroe and that district provides for multifamily development with a density of up to 8 or more units per acre. The difference in impact to the viewshed between the annexation alternative and the no annexation alternative is really a matter of degree.

The changes from growth cited by the commentor (traffic, noise, wastewater treatment) are not impacts of annexation itself but of the anticipated growth in the area that is projected to occur with or without annexation.

Comment 3.7-2: (Letter 3, James C Purcell, Village of Monroe Mayor, June 10, 2015):

Incredibly, the DGEIS concludes that there will be no direct impact on any visual or historic/cultural resources because "the proposed annexation action would not involve any physical disturbance of the ground...." (DGEIS at 3.7-2). The DGEIS sets forth this conclusion despite its acknowledgement that there will be significant development related to the large population growth of the annexation parcels, and that the State Parks database notes that potentially archaeological sensitive areas "cover the majority of the western annexation territory." (DGEIS at 3.7-2). Studies must be conducted to fully and effectively address the potential impacts to the visual and historical/cultural resources of the annexation area that will certainly result from its development to accommodate the estimated population surge if annexation occurs.

Response 3.7-2: The potential impact of development from the projected growth on the cultural environment is stated on DGEIS page 3.7-3: "Without or with annexation, future development could disturb virtually all of the developable land in some fashion, either resulting in temporary or permanent removal of vegetation and addition of new buildings and other facilities." Until such time as there is a site specific development plan, evaluation of the potential impact on cultural resources of a site specific action, and identification of necessary avoidance or other mitigation, is beyond the scope of the generic EIS.

The DGEIS further states: "Any site-specific action will need to comply with the applicable State and local requirements created for the protection of existing resources. Individual site plan or subdivision reviews will need to investigate the extent of project visibility from nearby roads and publicly-accessible locations, as well as investigate the potential for the presence of archaeological resources. Plan reviews will need to address possible mitigation measures such as avoidance of sensitive resources, replanting visual buffers, establishing green spaces bordering development, and constructing attractive building designs that are appropriate at each site to create a livable community. Such measures should be taken without or with annexation."

Comment 3.7-3: (Letter 7, Edward Goodell, Executive Director, New York-New Jersey Trail Conference, June 12, 2015): As custodian of two regional trails that traverse the proposed annexation, the New York-New Jersey Trail Conference is gravely concerned about both the environmental and cultural impacts that the proposed annexation will have on these historic trails. The trails in question are not small, inconsequential recreational footpaths, but popular multi-state greenways connecting a series of preserves and state parks. Over the past 30-years, work on the Long Path has continued as efforts to fully protect the trail corridor and eliminate road walks. We are actively working to preserve lands on either side of the trail to establish green corridors to connect preserved spaces across states. The two trails share a path leading out of Gonzaga Park along Seven Springs Road, onto lands owned by Orange and Rockland utilities. Currently the character of the road walk along Seven Springs Road is forested and rural. Although the DGEIS states that there will be tree screening so that no buildings are visible from the road, except in winter, there is no guarantee that the development will not follow the densely developed character of the rest of Kiryas Joel. Such development would alter the character not to a suburban, as claimed in the DGEIS, but an urban environment: out of character for an area adjacent to preserved parkland.

***Response 3.7-3:** The ultimate disposition of the land bordering Seven Springs Road along the trail route is unrelated to the annexation action. As Seven Springs Road is a public road, the annexation will not remove or hinder public access to the roadway and its right of way, as it now provides for users of the Highlands Trail/Long Path. However, the anticipated future development on Seven Springs Road and the concomitant modest increase in traffic on the local roads will change the character of this portion of the trail over time from a rural to a suburban landscape.*

DGEIS page 3.7-4 identifies an appropriate mitigation: “Individual site plan or subdivision reviews will need to investigate the extent of project visibility from nearby roads and publicly-accessible locations, as well as investigate the potential for the presence of archaeological resources. Plan reviews will need to address possible mitigation measures such as avoidance of sensitive resources, replanting visual buffers, establishing green spaces bordering development, and constructing attractive building designs that are appropriate at each site to create a livable community. Such measures should be taken without or with annexation.”

Given the location of the Gonzaga Park relative to the existing Village and the growth in population that is projected to occur with or without annexation, there is no reason to believe the annexation action will adversely affect the use of the park. The Village fully anticipates that the development of the annexation lands will honor and respect all public lands, including the County park and any existing trails and easements related thereto.

Likewise, as noted in the DGEIS, future applications for site development will be subject to SEQRA as well as all other applicable federal, State and local laws. Accordingly, while the DGEIS cannot identify site-specific development proposals that would be presented to the Town or Village in the future, it does provide the background to alert future decision-makers, including the Village Board, Planning Board and Zoning Board of Appeals, to consider the open space needs of its residents and to be carefully cognizant of important environmental assets of the annexation territory including the areas near the County’s Gonzaga Park.

Comment 3.7-4: (Letter 7, Edward Goodell, Executive Director, New York-New Jersey Trail Conference, June 12, 2015): We do not believe the claim that “future development of the land” is a foregone conclusion. We would in fact prefer to see it preserved, as part of an important green corridor that we have been actively working to preserve, connecting state parks such as Sterling Forest, Goose Pond Mountain State Park, Schunemunk Mountain State Park and the Black Rock Forest. Green corridors are not only important to public recreational use, but vital to wildlife migration, genetic flow, and ecological health of biotic communities. A dense development in the middle of this green corridor would disrupt the progress that has been made in the creation of a corridor, as well as being completely inappropriate to the area. We are especially concerned that the annexation and probably development will be right up to and surrounding the borders of Gonzaga Park, on both sides of Mountain and Seven Springs Roads. Such development would disrupt the character of, and create a negative visual impact to these preserved lands, and probably become a deterrent to recreational use of public space. In fact, we have no other suitable place to put the trails than this critical spot. Heavy development on this critical ‘neck’ of land would substantially affect accessibility of these two trails, and would deprive the public of their current enjoyment of these two high profile trails.

Response 3.7-4: Refer to response to comment 3.7-3.

Comment 3.7-5: (Letter 7, Edward Goodell, Executive Director, New York-New Jersey Trail Conference, June 12, 2015): Although the DGEIS states that ‘the annexation will not remove or hinder public access to the County parkland from Seven Springs Road or Mountain Road’, we think it is a reasonable concern that the extreme religious nature and dress code of the community occupying the current Village of Kiryas Joel could result in harassment of secular hikers walking on public roads along the trail in the proposed annexed areas.

Response 3.7-5: Access to the County parkland will remain uninhibited from the public road. There is no reasonable basis to support the comment that annexation will lead to harassment of hikers. The Village of Kiryas Joel recognizes that hikers using the public trails are likely to be dressed in recreational gear different from conservative “street attire.”

The Village is not a religious entity and has no dress code; it does not enforce any religious dress code. It is a government enforcing secular laws only as mandated by the US Constitution.

Comment 3.7-6: (Letter 7, Edward Goodell, Executive Director, New York-New Jersey Trail Conference, June 12, 2015): Dense development always results in higher traffic, creates both an unpleasant and unsafe experience for hikers. This is not the hiker experience we have been striving to create.

Response 3.7-6: Refer to response to comment 3.7-3.

As noted elsewhere, the annexation petition being considered here by the Town and Village governments was filed by a group of private property owners in the Town. Annexation will not affect current ownership or uses of publically owned property. The Village fully anticipates that development within the annexation territory will honor and respect all public lands, including the County Park and any existing trails and easements related thereto.

Comment 3.7-7: (Letter 39, Tracy Schuh, The Preserve Collective, Inc., June 22, 2015): In regards to cultural resources section (3.7), is there a map and photos in the DGEIS to illustrate and support its determinations? When looking at the big picture of Orange County, opportunities in connecting conservation corridors may present themselves following the paths of the hiking trails.

Response 3.7-7: The general pattern of development and open space can be seen in DGEIS Figure 3.6-2. Refer to responses to comments 3.7-3 and -4.

Comment 3.7-8: (Letter 39, Tracy Schuh, The Preserve Collective, Inc., June 22, 2015): High density development in mountain areas of the Village of Kiryas Joel is already seen from the famous Appalachian National Scenic Trail (see attached photo). This is an example of missed opportunities in past Planning Board review processes to mitigate impacts of development in higher elevations. Had they utilized the NYS DEC Program Policy known as “Assessing and Mitigating Visual Impacts” perhaps they could have reconsidered the location of high density development and extensive clearing by implementing mitigation measures to reduce visual impacts e.g. earth tone colors and tree preservation in this viewshed. If the annexation is approved, how will the Village of Kiryas Joel do this in the future? More specifically, under the DEC Program Policy (pages 3-4), the Appalachian Trail is an “aesthetic resource of statewide significance”, and if the proposed annexation will have visual impacts on it, these impacts were not specifically assessed or mitigated in the DGEIS.

Response 3.7-8: Comments noted. No site-specific project is proposed upon which a visual impact assessment could be conducted for the DGEIS. The generic assessment does, however, discuss appropriate mitigation on page 3.7-4: “Any site-specific action will need to comply with the applicable State and local requirements created for the protection of existing resources. Individual site plan or subdivision reviews will need to investigate the extent of project visibility from nearby roads and publicly-accessible locations, as well as investigate the potential for the presence of archaeological resources. Plan reviews will need to address possible mitigation measures such as avoidance of sensitive resources, replanting visual buffers, establishing green spaces bordering development, and constructing attractive building designs that are appropriate at each site to create a livable community. Such measures should be taken without or with annexation.”

Comment 3.7-9: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): With regard to community character, cultural and recreational resources, it is a state objective to preserve lands within the Highlands region. Schunnemunk Mountain and connections to trails and other open space lands are being targeted for open space. The lands on the west side of the VKJ boundaries, especially west of Seven Springs Road, are part of the Schunnemunk Mountain complex. This area must be conserved in open space, consistent with the state’s open space and recreation objectives.

Response 3.7-9: Parcels in the annexation territory west of Seven Springs Road are in private ownership and there are no known conservation easements or other legal restrictions that would preclude possible future development of these lands. Likewise, there also would appear to be no impediment to acquisition of particular parcels for conservation purposes by the state or other organizations.

Comment 3.7-10: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The DGEIS does not evaluate potential impacts on historic and archaeological

resources. At a minimum and given the magnitude of the annexation, a Phase IA cultural resource evaluation must be performed to assess potential impacts on these resources.

Response 3.7-10: Evaluation of impacts of site-specific development actions is not a function of a generic EIS. Also refer to response to Comment 3.7-2.

Comment 3.7-11: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): Please identify any cultural resource investigations that have been done for the large-scale housing developments that have been constructed within the existing VKJ, as support and an indication that these studies will be conducted after land is annexed into the Village.

Response 3.7-11: Conducting an investigation of past cultural resource investigations for projects not related to the annexation action is beyond the scope of the DGEIS. Refer to responses to comments 3.7-8 and -10.

Comment 3.7-12: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): This section begins with an arbitrary delineation of “study area” as it pertains to an evaluation of cultural resources, which includes visual resources. A viewshed map and analysis must be provided which documents locations from which the annexation area will be visible. There is no basis or substantiation that views are limited by local topography. Portions of the existing Village of Kiryas Joel are quite visible from NYS Route 17 and areas within the Village of Monroe. The DGEIS must document existing historic, scenic and cultural facilities within the project vicinity, including outside of the VKJ, document locations from which the annexed areas would be visible, and in particular, whether there are any significant historic or scenic resources which would be adversely impacted by development of the annexation lands.

Response 3.7-12: Without or with annexation, future development could disturb virtually all of the developable land in some fashion, either resulting in temporary or permanent removal of vegetation and addition of new buildings and other facilities. [DGEIS page 3.7-3.] Until such time as there is a site specific development plan, evaluation of the potential impact on cultural resources of a site specific action, and identification of necessary avoidance or other mitigation, is beyond the scope of the generic EIS.

Inspection of area topography indicates that portions of the annexation territory would potentially be visible from limited segments of the following roads outside the Village: Route 6/17, CR 44 (Mountain Road), CR 105, Acres Road and Bakertown Road. Development plan reviews will need to address possible mitigation measures such as avoidance of sensitive resources, replanting visual buffers, establishing green spaces bordering development, and constructing attractive building designs that are appropriate at each site to create a livable community. Such measures should be taken without or with annexation. [DGEIS page 3.7-4.]

Comment 3.7-13: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The DGEIS incorrectly states the following: “However, under either development scenario described in the Project Description (without or with annexation), disturbance of the land would result from development activities to much the same degree regardless of the action. Without or with annexation, future development could disturb virtually all of the developable land in some fashion, either resulting in temporary or permanent removal of vegetation and addition of new buildings and other facilities.” This is not true and an unsupported statement. The resulting residential and visual character of lands that are zoned

for a residential density of 1 acre per dwelling unit, or 3 acres per dwelling unit, would retain much more significant expanses of undeveloped woodland than under a scenario where the realistic buildout of the annexed lands, based on VKJ existing development, would be at a density of up to 20 dwelling units per acre. Existing aerial photos of the VKJ readily demonstrate this pattern. The DGEIS also does not realistically consider the additional density reduction that results by excluding environmentally constrained lands from the calculation of buildout under the “without annexation” alternative, thereby further reducing development and the visual impacts that would result. The DGEIS fails completely to discuss the significant adverse impact that would result to existing rural community character, in part reflected by the type of visual environment preserved by lower density development.

Response 3.7-13: *The development scenarios presented in the DGEIS for evaluation are intended to illustrate the greater extent of possible development. The scenarios therefore include the stated assumptions, such as with central sewer and water which is generally required for higher density development, and accessory apartments where they are allowed, but exclude known environmental constraints such as wetlands. Yield was calculated applying the calculated maximum density multiplier to the net lot area (after reducing the lot area by its constraints). As stated in the DGEIS, disturbance of all developable land would be expected to result from development activities regardless of the action.*

As further stated in the DGEIS, future applications for site development will be subject to SEQRA as well as all other applicable federal, State and local laws. Accordingly, while the DGEIS cannot identify site-specific development proposals that would be presented to the Town or Village in the future, it does provide the background to alert future decision-makers, including the Village Board, Planning Board and Zoning Board of Appeals, to consider the open space needs of its residents and to be carefully cognizant of important environmental assets of the annexation territory including environmentally sensitive areas.

Under the no-annexation scenario, the lands zoned for low density residential development (Monroe's rural residential zoning districts) are likely to experience less overall yield than the annexation scenario where, depending upon land constraints and future zoning decisions, a higher yield may occur. When comparing the no-annexation alternative to the annexation alternative, particularly for the aforementioned lands, the future landscape may be more “rural” in appearance than under the annexation scenario by virtue of building density.

Comment 3.7-14: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The DGEIS incorrectly states that the without annexation alternative would result in “suburban” development. Density which allows one dwelling unit per three acres is not suburban, but rural, consistent with the Town of Monroe Comprehensive Plan.

Response 3.7-14: *The terms suburban and rural are often subjective. The US Census Bureau distinguishes between urban and rural (greater than or less than 1,000 persons per square mile, respectively) and does not make finer distinctions.*

Development under the Town of Monroe RR-1.0 and RR-3 zoning would typically create conventional single-family, detached residential landscapes; development under the Village of Kiryas Joel PUD zoning would typically create multi-family, attached residential

landscapes. Both scenarios would not be considered rural but rather can be considered suburban.

Comment 3.7-15: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The DGEIS continues to state: “Development can be anticipated to include contemporary, multi-family housing and neighborhood commercial uses, local roads and various pedestrian amenities such as wide sidewalks, shelters at bus stops, and fencing around residential yards.” First, this is an indication that the DGEIS has not fully examined the real “with annexation” alternative – the DGEIS admits that a whole range of uses will occur on the annexation lands, but then only evaluates an arbitrary, solely residential, 2025 buildout scenario. This statement is also not true for the without annexation alternative, as commercial uses are not allowed in the existing Town of Monroe zoning districts within the annexation area. This is further evidence that the DGEIS’s conclusions that visual impacts would be the same under either alternative are incorrect, as the character of the development to be constructed under the alternatives will be vastly different.

Response 3.7-15: *The DGEIS states repeatedly that the anticipated development with annexation would include residential use with a component of supporting commercial and institutional uses, beginning on Project Description page 2-7: “There is continuing demand for new housing for new families in and around the Village, as well as demand for support facilities – neighborhood commercial uses, schools and other community service facilities – that are part of the fabric of this community.” The DGEIS focuses on projections of population growth and resulting residential development as this is the primary force behind any accompanying demand for other uses.*

The extent of non-residential development, in terms of its visible scale, would be relatively minor compared to the predominant residential development. Thus, notwithstanding that the projected development in the Town under no-annexation would not include commercial uses, there would be visual impacts of development under either scenario that would warrant review for the purpose of identifying appropriate mitigation based on site-specific development plans that are proposed in the future but are not known now.

As noted elsewhere, the annexation petition was not accompanied by a development project or plan for the annexation territory. Future applications for site development will be subject to SEQRA as well as all other applicable federal, State and local laws.

Comment 3.7-16: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The DGEIS states: “Development on higher topography, when planned, should be evaluated at the site plan review stage to identify opportunities for buffering of views that would otherwise be opened from nearby vantage points.” This analysis can and must be performed at this time – that is the purpose of the DGEIS analysis. Using standard viewshed analysis methodology, it can be readily determined which areas would be visible from surrounding sensitive historic and scenic resources.

Response 3.7-16: *Refer to response to Comment 3.7-12.*

Comment 3.7-17: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): A specific visual impact analysis should be conducted for the Highland Trail/Long Path. At various vantage points along the path, it can be determined, using standard visual impact methodology, whether views from the trail will be impacted by the introduction of

high density, urban development comparable to that which exists presently in the VKJ. Simply stating that the “path was walked” is inappropriate methodology and unsupported.

Response 3.7-17: *A determination was made for the DGEIS assessment by a seasoned researcher experienced in visual impact analysis from in-field reconnaissance on the trail, as described on page 3.7-3. The investigation determined that “there would be filtered visibility of buildings through the trees looking toward Kiryas Joel or the proposed annexation territory when leaves are not on the trees. Some development in the annexation territory would be somewhat visible through the trees from a portion of the trail only during the winter months. The extent of this change would not significantly change the character of the trail experience.” In-field reconnaissance is most certainly an appropriate methodology for a visual assessment.*

Comment 3.7-18: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): Standard multipliers exist for the appropriate amount of land which should be set aside to accommodate areas for active and passive recreation. The DGEIS fails to quantify how much recreational land would be required to meet the demands of the population at buildout. The DGEIS fails to quantify the need to set aside land for recreational pursuits.

Response 3.7-18: *The effect of setting aside land for recreation would reduce the projected density of development. There is therefore no need to quantify the need for open space/recreation land for the purposes of the DGEIS, which was designed to evaluate maximum build scenarios. For any development in the annexation territory, with or without annexation, the respective municipality will need to evaluate the needs of the community in determining the extent of open space and recreation that any specific development may need to contribute.*

Comment 3.7-19: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): What will the impact be to hikers and public users who want to travel on the trails within the annexation area, or use the County Park? A portion of Gonzaga Park is within the area to be annexed. It is common for hikers and recreationalists to be dressed in shorts, tank tops, and other types of recreational gear in summer months. If annexed, these recreational users will be entering a village where signage is posted which requires anyone, including visitors, within the Village to wear “long skirts or pants”, “covered necklines”, “sleeves past the elbow”, and “maintain gender separation in all public areas.”

Response 3.7-19: *Refer to response to Comment 3.7-5.*

Comment 3.7-20: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The DGEIS fails to compare the amount of recreational land, or fee in lieu of land, which would be generated under the with and without annexation alternatives. In the without annexation alternative, homeowners in the annexation lands have full use of the Town of Monroe recreational properties. The DGEIS does not mention any Town of Monroe recreational facilities, and the benefits they offer in this regard.

Response 3.7-20: *Refer to response to Comment 3.7-18. The DGEIS section 3.7.1 discusses the primary local recreation facilities that the population of the study area utilizes.*

Comment 3.7-21: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The VKJ practice of not preserving open space (except wetlands where they

cannot by state regulation) is an unsustainable development practice. The DGEIS argues that because the VKJ has sidewalks, it is sustainable. However, sustainable design encompasses many other facets of design, including open space set asides for passive recreation and health benefits that are immediately accessible to the population it serves.

Response 3.7-21: Refer to response to Comment 3.7-18.

[There is no Comment 3.7-22.]

Comment 3.7-23: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): The document suggests that the proposed annexation territory is visible from the Highlands Trail/Long Path located less than ½ mile north of the site. There is no estimate of the anticipated land clearing and loss of vegetation associated with annexation. There is no documentation of the potential visibility (i.e., photographs, zone of visibility analysis) provided to substantiate this claim or to understand the potential impacts.

Response 3.7-23: Potential visibility of a development project needs to be determined when there is a site-specific proposal upon which to conduct such an evaluation. Also refer to response to Comment 3.7-17.

Comment 3.7-24: (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015): The DGEIS notes that because Seven Springs Road is a public road, the annexation will not remove or hinder public access to the roadway as it currently provides for users of the Highlands Trail and Long Path, significant regional hiking trailways. However, people using those trails might be impacted should the Village post signs (as it currently does at other entrances to the Village) asking visitors to dress in a modest way, specifically by “wearing long skirts or pants; covered necklines; sleeves past the elbow; [and to]...maintain gender separation in all public areas.” Impacts to users of the trails should be addressed.

Response 3.7-24: Refer to response to Comment 3.7-5.

Comment 3.7-25: (Letter 69, Daniel Richmond, Zarin & Steinmetz, June 22, 2015): A discussion of visual impacts and community character is crucial to the analysis. This includes “the potential displacement of local residents and businesses,” regardless of whether the Proposed Annexation may effect these impacts primarily or secondarily or in the short term or in the long term. The DGEIS does not fully consider the impacts that the proposed Annexation, as well as each potential development scenario, would have on the character of the adjoining areas. (See DGEIS at 3.7-3 (concluding that “future development could disturb virtually all of the developable land in some fashion”).) This analysis should include potential impacts on existing patterns of population concentration, distribution, or growth.

Response 3.7-25: The proposed annexation action would not involve any physical development and thus, would not directly impact visual resources or patterns of population concentration and distribution. However, under either development scenario described in the Project Description (without or with annexation), disturbance of the land would result from development activities that can be anticipated in the annexation territory. As vacant land is cleared to make way for new development, the character of the local landscape will change (DGEIS page 3.7-3).

Without annexation, development can be anticipated to include contemporary, single family, large lot subdivisions in a neighborhood character of the style of development that is built in the Town of Monroe. With annexation, development can be anticipated to include contemporary, multi-family housing and neighborhood commercial uses in a neighborhood character of the style of development that is built in Kiryas Joel.

Projected patterns of population concentration and distribution under the studied alternatives are presented in DGEIS Tables E-1 and ALT E-1. It cannot be predicted whether future growth and resulting development will displace existing development or populations in other areas but there is very little development in and around the 507-acre annexation area now.

Development potential of the annexation lands and nearby lands in the neighboring municipalities based on the existing zoning will ultimately yield differences in residential densities. These relationships are not unlike what already exists, or is possible under existing zoning, around the boundaries of the Village as it exists right now. (DGEIS pages 3.1-17 and -18.)

Comment 3.7-26: (Letter 69, Daniel Richmond, Zarin & Steinmetz, June 22, 2015): Explain the consequences of converting rural land to high density development, such a conversion for consistency with all applicable planning documents, including the comprehensive plans of both the Town and the Village, the Orange County Comprehensive Plan, the Orange County Greenway Compact, the Orange County Open Space Plan, and the Ramapo River Watershed Management Plan. Discuss the potential displacement of Town residents, including displacement resulting from declining home values. Include a discussion of lighting impacts as a result of each proposed development scenario on surrounding communities. Include concrete mitigation measures to limit potential adverse impacts on these communities. Discuss landscaping, buffering and other tactics to avoid impacts to sensitive resources and to Village and Town residents.

Response 3.7-26: See discussions of conformance with land use plans in DGEIS section 3.1.2: Village of Kiryas Joel Comprehensive Plan, Town of Monroe Master Plan, Town/Village of Woodbury Land Use Plans, Village of South Blooming Grove Comprehensive Plan / planning policy, Orange County Comprehensive Plan and Open Space Plan, and various regional plans (DGEIS pages 3.1-4 through 3.1-12). Also refer to response to Comment 3.7-25.

Until such time as there is a site specific development plan, evaluation of the potential impacts resulting from development of a site specific action (such as related to lighting, concrete, or landscaping), and identification of necessary avoidance or other mitigation, is beyond the scope of the generic EIS. Refer to response to Comment 3.7-2.

Comment 3.7-27: (Letter 69, Daniel Richmond, Zarin & Steinmetz, June 22, 2015): Include a review of aesthetic and visual impacts to surrounding communities in both the Town and the Village. Specifically, the SGEIS should identify in text and photographs the visual characteristics and significant visual resources in the proposed Annexation area, as well as in proximate areas with affected viewsheds, including, but not limited to, viewsheds from scenic resources. The SGEIS should include a viewshed analysis based on the potential heights of buildings under each proposed development scenario, identifying the worst case viewsheds and conditions that could have a clear line of sight toward the developments. Mitigation measures should be proposed to limit any potential adverse impacts on visual resources, including scenic views.

Response 3.7-27: See response to comment 3.7-12 and -25.

Comment 3.7-28: (Letter 69, Daniel Richmond, Zarin & Steinmetz, June 22, 2015): In addition to the Highlands Trail/Long Path and Gonzaga Park, the SGEIS must also study potential impacts to the Heritage Trail, Crane Park, and the new Village private park on Larkin Drive.

Response 3.7-28: The proposed annexation action would not involve any physical development and thus, would not directly impact recreational resources. Potential visibility of a development project needs to be determined when there is a site-specific proposal upon which to conduct such an evaluation. The impact on existing local recreational resources is discussed on DGEIS pages 3.7-3 and -4. The Heritage Trail goes through Crane Park in the Village of Monroe, which is discussed on DGEIS pages 3.7-3.

Comment 3.7-29: (Letter 75, Richard Timm, June 22, 2015): Please account for the routing impact on the Highlands Trail and the Long Path. Please account for the impact on hikers themselves. Please account for the economic impact of creating an atmosphere that this is no longer a hiking friendly area. Please account for the impact on the 28 items listed on Amazon under Highlands Trail NY.

Response 3.7-29: See response to comment 3.7-3 and -5. The impact on the Highlands Trail was investigated, as discussed on DGEIS pages 3.7-3 and -4. See also response to comment 3.7-17. (The "28 items listed on Amazon" cannot be determined to provide a response.)

Comment 3.7-30: (Letter 76, Kate S. Ahmadi, Ph.D., Blooming Groove, June 16, 2015): Gonzaga Park is small. According to the County property website, it is 115.7 acres in size. Because of this relatively small size, losing 7 acres would have a significant impact. More specifically, it is unclear but seems that this decrease would take place at the entrance. Compromising accessibility is crucial, of course, and, in fact, might compromise the entire parcel; given the narrow steep terrain after the entrance gate, access might be impossible. In addition, parking for hikers outside the gate (during winter hours when the park has been closed during the last years) would probably be impossible. Maps do not reveal whether or not the small pond, the glory of the Park, the home of dragonflies, now home to a picnic table -- where several people have fished, as one elder had done with his family as a child, or its stream, would be part of the lost 7 acres.

Gonzaga has already had a complicated history. The State took it over in 1995. In 2004, the State turned Gonzaga over to the County for a public park. It opened in 2012.

This grant is made and accepted upon the condition that said Premises shall be improved and maintained for park, recreation and playground purposes. Regarding the parking and the trailhead, specifies:

Grantor reserves the right but not the obligation to construct a parking area and trailhead near the intersection of the aforementioned trail easement and the northerly line of Seven Springs Road, said parking area to be limited to a maximum of twenty (20) cars, the exact location of said trailhead and parking area to be determined by agreement between the Grantor (or the

Commissioner of the Office of Parks, Recreation and Historic Preservation on behalf of the Grantor) and Grantee.

Grantee covenants and agrees that the portion of the herein described Premises lying above contour elevation 1060 feet USGS Quadrangle (Monroe) shall not be improved or developed except for open space purposes or as required by the Office of Parks, Recreation and Historic Preservation for the management and maintenance of the aforementioned trail easement. Finally, during the several years it has been operating as an Orange County Park, it has developed into a small but lovely well-maintained community park. On or near borders between Kiryas Joel, Woodbury, South Blooming Grove, and Monroe, it welcomes all.

In conclusion, I speak and write against the annexation of any part of Gonzaga Park. Any annexation would have negative detrimental impact on the Park -- and thereby on Schunnemunk Mountain--- in these specific ways: size, access, parking, functionality, viewshed, access to trails, protection of ridge and pond/stream, wildlife, human relations, and fundamentally its legality.

Response 3.7-30: *The annexation will not remove any land from Gonzaga Park, nor will it hinder the existing access point to the park or trails, or user parking, at Seven Springs Road. National, State and County parks often straddle state, county, town and village municipal boundaries. The aforementioned seven acres of Gonzaga Park will continue to be County parkland and will remain part of Gonzaga Park. The annexation will not impact any rights or obligations with respect to the relationship between the County and Gonzaga Park.*