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Tim Miller Associates
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June 12, 2015

Mr. Miller

Re: Public Comment for DGEIS on Proposed Annexation in Monroe by Kiryas Joel

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.

The Long Path, 356 miles in length from the George Washington Bridge to Boyd Thacher Park, NY, connects significant cultural and environmental features of New York State. Over the past 30-years, work on the LP has continued as efforts to fully protect the trail corridor and eliminate road walks.

The Highlands Trail, a multi-state 150-mile-long route that connects scenic and historic attractions, extends from Storm King Mountain on the Hudson River in New York south to Riegelsville, New Jersey, on the Delaware River. It highlights the natural beauty of the Highlands region, and draws the public's attention to this endangered resource. It is a cooperative effort of the New York - New Jersey Trail Conference, conservation organizations, state and local governments, and local businesses. We are actively working to preserve lands on either side of the trail to establish green corridors to connect preserved spaces across states.

Environmental Concerns:

1. Visual

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.

2. Land Conservation

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.

Additionally, it is not true that dense development is more sustainable and has a lower impact on its surroundings, as claimed in the DGEIS, if it results in severely altering natural space. Dense development would be better suited to using vacant lots in urban areas than despoiling rural areas, and creating a heavy user impact on its water and waste treatment resources.

3. Natural impacts

Due to available resources, this area is currently zoned for "rural residential" living (homes on 1 - 1.5 acres) and if developed under its current zoning would have a moderate if not insignificant population increase in the coming years. If Kiryas Joel were to annex this land they would re-zone it to coincide with current village zoning codes to urban and build high-density high-rise housing. The impact to the natural surroundings necessary to accommodate this growth has not been addressed by this DEIS.

Assuming the annexed lands will be rezoned to coincide with the current Village of Kiryas Joel, the deforestation that would ensue would lead to the loss of habitat for many species, including the Indiana Bat and Dwarf Wedge mussel, both on the endangered species list. The clear-cutting of these trees will also completely alter the rural landscape and aesthetic of the greenway. Although the document mentions the area has been noted as habitat for potential rattlesnake dens and other protected species, we note that no official survey has been carried out. The lack of such surveying calls into question the thoroughness of this DEIS.

Cultural Concerns:

1. Social/ societal

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.

2. Traffic

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.

We trust that you will heed our concerns and consider preserving the land as a vital green link in the chain of important and valuable green areas and mountains we are privileged to have in our region.

Sincerely,



Edward Goodell
Executive Director
New York-New Jersey Trail Conference

