

### **3.6 Community Services**

**Comment 3.6-1 (Mr. Levine, Public Hearing Transcript, June 4, 2009):** Columbia gas pipeline proposed to develop a new pipe in northern Ramapo, they had an existing pipeline that cut through further down. The final route took the pipeline up -- up 202 and then down on the railroad bed in the Mount Ivy Swamp. The existing pipeline that existed prior to that was abandoned. Look at how close you're putting houses to that pipeline.

***Response 3.6-1:*** Homes located nearby the Columbia Gas Line exist in many locations and are not unique to Patrick Farm. Appendix R of the DEIS includes Columbia Gas Construction Guidelines which the project will conform to.

*Some of the techniques that will be utilized to accommodate the existing gas line include:*

1. *Deed restrictions on future lots which limit disturbance in proximity to the gas line.*
2. *Perpendicular utility crossings.*
3. *2 feet of vertical separation when crossing below the main.*
4. *Construction of road crossings early in the construction process.*
5. *Each lot in proximity to the pipeline will contain a sign indicating location of the pipeline.*

**Comment 3.6-2 (Mr. Kunz, 51 Third Street, Public Hearing Transcript, June 4, 2009):** I'm a volunteer fireman with the New City Fire Department. We've taken a special interest in the Patrick Farm proposal because it includes plans for 24 rental apartments that would be reserved for members of local emergency service. Recruiting and retains volunteers have become more and more difficult over the past decade, partly because of the high cost of housing in Ramapo and Rockland County, which forces many young people to live elsewhere. This deprives the fire department and other volunteer corps of the new -- of the new members we need to replace older volunteers who retire and move on or pass away. Being able to offer affordable, high quality housing in exchange for being a volunteer will help address this problem.

***Response 3.6-2:*** Comment noted. The Applicant proposes to construct 24 emergency service worker apartments directly adjacent to the Hillcrest Fire Station. These apartments would provide an below market rate, high quality housing option for workers who volunteer within the Town of Ramapo.

**Comment 3.6-3 (Mr. Kuzniki, Laura Lane, Public Hearing Transcript, June 4, 2009):** Affordable housing is clearly needed in our Town, especially rentals for emergency volunteers, which Ramapo has an abundance of. And I believe that it will be very important for -- for the Board to approve this type of affordable housing for these type of volunteers that are very instrumental in keeping our Town safe.

***Response 3.6-3:*** Comment noted. Refer to Response 3.6-2.

**Comment 3.6-4 (Mr. Goldman, Public Hearing Transcript, June 4, 2009):** ..we're looking at all of these units. Did anybody do the simple math and say there's going to be three to 4,000 people that could be living on a small little piece of property?

***Response 3.6-4:*** As stated in Chapter 3.6 of the DEIS, the Patrick Farm development is expected to add a total of 1,932 persons, including school age children, to the Town of Ramapo's existing population. This figure is based on the demographic information for the "Single family attached and detached categories" of housing types for New York State and is based on the 2000 US Census Bureau data.

**Comment 3.6-5 (Mr. Goldman, Public Hearing Transcript, June 4, 2009):** What contributions is this development giving our Town back?

***Response 3.6-5:*** The Patrick Farm development is proposed to help meet the need for a diversity of housing in the Town of Ramapo, as identified in the Comprehensive Plan, and includes 314 market rate condominiums for sale, 72 workforce condominium flats for sale, and 24 workforce housing apartments for rent which directly adjoin the Hillcrest Fire Station. Refer to Response 3.6-2 in reference to the Town's need for workforce housing apartments. The project would also generate an additional \$5,114,056 in property tax revenues.

*In addition to providing a diversity of housing options within the Town, The Applicant will employ construction workers and purchase construction materials from local sources. In addition to stimulating the local economy, this practice will provide the added ecological benefit of reducing fuel consumption by reducing the distance workers and materials have to travel to the project site.*

*The Applicant has offered to make available the use of land, for future construction of a long term use ambulance building in the vicinity of the community service worker housing, in proximity to the Hillcrest Fire Station on NYS Route 306.*

**Comment 3.6-6 (Mr. Solomon, 28 Scenic Drive, Public Hearing Transcript, June 4, 2009):** Last month we had to do without water for almost two hours because of a water main break. A few months ago it was a power failure. But you can't deny that the frequency of such events are directly correlated to the density of the population.

***Response 3.6-6:*** Neither the Applicant nor his Consultants are familiar with Mr. Solomon's utility service interruption issues.

**Comment 3.6-7 (Mr. Stefanski, 28 Mariner Way, Public Hearing Transcript, June 4, 2009):** Look at the current development that was just finished on Route 306, how beautifully it enhanced Route 306. I currently live in a development that he built. I do have to say, I have children, my beautiful home, that thanks to Mr. Lebowitz I've lived in.

***Response 3.6-7:*** Comment noted. The Applicant has an established reputation for building projects that become an asset to their community.

**Comment 3.6-8 (Mr. DePaola, 67 Babcock Lane, Public Hearing Transcript, June 8, 2009):**

..if all these additional schools that they want to build in our area are put up, it's gonna put a tremendous strain upon us, the fire men of Rockland County, that you can't just take and put thousands more in a location and not expect some problems with trying to support the fire department in this respect.

***Response 3.6-8:** Based on the analysis provided in Chapter 3.6 of the DEIS, the population increase associated with the development of Patrick Farm is anticipated to generate a demand for 3.2 additional fire personnel. This number is based on planning standards contained in the Urban Land Institute's (ULI) 1994 Development Impact Handbook, which estimates 1.65 fire personnel per 1,000 population is required to serve a new population. The ULI multipliers assume no existing services, thus the actual demand for personnel is expected to be somewhat lower.*

*According to a November 7, 2008 letter from Hillcrest Fire Chief Chris Kear, because of the Patrick Farm project and other proposed developments within the area, the Department will have to conduct an evaluation of apparatus and response as well as contact Insurance Services Office (ISO) regarding their insurance rating and to inquire about whether or not these proposed projects would have an effect on their overall rating.*

*Patrick Farm is anticipated to generate property tax revenues to the Moleston Fire District, which serves the area of the project site, of approximately \$115,111 annually. This additional revenue can be used to augment the Hillcrest Fire Company's capabilities as necessary.*

**Comment 3.6-9 (Mr. Nguyen, 123 Camp Hill Road, Public Hearing Transcript, June 8, 2009):**

My wife and I moved to Pomona from the City about ten years ago. Love at first sight. I fell in love with our property because it's situated in a charming, spacious and rural environment, with law abiding and tax paying neighbors in one acre zone. And that was a major attraction and reason my wife and I choose Pomona as a place to call home, sweet, home. Suddenly we are confronted with no one, but three major organizations projects; the Tartikov Rabbinical College, the Congregation of Mesa Beth Sura School and Dormitory, and the Patrick Farm diversity of housing. Each has profound, negative impact to the environment, dilapidate or cripple the existing infrastructures, road, water sewage, exhaust available resource and services; fire, police, emergency, snow removal, which will lead to major tax increase and plummets in property value.

***Response 3.6-9:** It should be noted that the sponsor of the proposed Patrick Farm development is not involved with either of the other major projects referred to in the comment. Nevertheless, Patrick Farm has been designed to be environmentally sensitive. Alternative sustainable energy sources will be utilized to augment energy resources utilized on site and the proposed action would incorporate a number of green building practices, as identified in the 2008 National Green Building Standard, that would conserve energy and offset potential adverse impacts associated with energy consumption related to the construction and occupancy of the proposed project including utilizing water saving fixtures, high efficiency lighting fixtures, high efficiency insulation, and ecologically sensitive construction management practices.*

*As demonstrated by analysis in Chapter 3.6 of the DEIS, the proposed action is not anticipated to have significant impacts on existing community services, including fire, police, and emergency services. With the completion of the improvements to NYS Route 202, completion of the improvements underway at the Palisades Interstate Parkway/Thiells-Mt. Ivy Road intersections, and the installation of left turn lanes at the proposed site access, the traffic to and from Patrick Farm can be accommodated on area roadways. Traffic flow and public safety along the frontage of the site will be provided as a result of the proposed road improvements and project mitigation measures.*

**Comment 3.6-10 (Ms. Louie, Public Hearing Transcript, June 8, 2009):** I believe a couple of people spoke about it already, the Supervisor was quoted as saying that there was a small turn out because people might have accepted the project. Nothing could be further from the truth. There are several reasons why there's not a huge, huge turnout here. One is that even people who I know who are very well informed had no idea that these hearings were going on. People who read the papers, who keep up with issues that are going on in the Town and the County and the Village had no idea that these hearings were going on. I looked at the public hearing notice on the corners of the property. It only said June 4th on it. It doesn't have tonight's date on it. It was very sketchy. And the location of this venue is not an easy place to find if you don't know anything about it. Unless you have students who are athletes and you know where these fields are, nobody knows this building even exists in many parts of the Town. So that was a little disingenuous. There's a lot of reasons why people aren't showing up here to the St. Lawrence center for these hearings.

***Response 3.6-10:*** *The public hearing was noticed in accordance with all applicable SEQR and Town of Ramapo guidelines, including publication in the Town of Ramapo's designated newspaper.*

**Comment 3.6-11 (Deputy Mayor Yagel, Public Hearing Transcript, June 8, 2009):** These are environmentally sensitive lands. They feed the most heavily taxed well field in the entire state. What does United Water do? And I've seen the letter that was submitted in the proposal. We have enough water, United Water Says. Uhh. I've seen people get up here at the last Comprehensive Master Plan and say, you know, I've heard a lot of problems about water. And it was acknowledged because we were in a drought situation then. And the person said, why don't you just truck the water in. Fifty gallons a day at a class five drought emergency, multiply that by the 15,000 people that could be in this area. That's a hell of a lot of trucks on our roads.

***Response 3.6-11:*** *It should be noted that the Applicant has not proposed at any point to supply Patrick Farm with water trucked to the site. As stated in Chapter 3.6 of the DEIS and referred to by the commentor, United Water New York has indicated their willingness to serve the proposed project. United Water New York has adequate resources to serve the project. Water infrastructure upgrades may be required, and the applicant will fund and/or install these improvements as per any conditions required by United Water New York.*

**Comment 3.6-12 (Ms. Maniscalco, Resident of Village of Pomona, Public Hearing Transcript, June 8, 2009):** I work for the East Ramapo Central School District, and I already am witnessing deterioration of a once strong and competitive school district. We now have a majority of non-public school board members who are intent on cutting back taxes so much as to eventually eliminate all co-curricular music art and athletic programs, as well as decreasing the number of teachers, and increasing class sizes. As you can see by the closing of Colton School.

***Response 3.6-12:*** As noted in Chapter 3.6 of the DEIS, the total number of schoolage children to be generated by the project was calculated based on student multiplier data available from the Rutgers Center for Urban Policy Research, June 2006. This data was compared to the census block specific data for Monsey, Spring Valley and Pomona to insure that it would accurately project the population anticipated to live at Patrick Farm. Based upon this data approximately 609 students would be projected to live at Patrick Farm. The East Ramapo School District is unique in that approximately 67 percent of the school children that live in the district attend private school. Based upon this proportion, approximately 201 students may be introduced into the East Ramapo Central School District. The district has been suffering with declining enrollment and an influx of publicly-enrolled students to this district would be a beneficial impact. Patrick Farm would generate annual property tax revenues of \$3,190,268 to the East Ramapo Central School District.

*Per the analysis performed in Chapter 3.7 of the DEIS, Patrick Farm will generate a total of \$3,374,801 in annual property tax revenues to the school district, including the Library tax and the Schools Town Fee. The increase in assessed valuation will generate \$3,215,732 above current taxes. After meeting the projected combined costs of school district services to both public and private school students of up to \$2,621,574, the overall effect on the district's budget is projected to be positive.*

**Comment 3.6-13 (Mr. Drennen, Public Hearing Transcript, June 8, 2009):** Few children for the schools. No impact I think the gentleman said. Unless all these children area going to go to private schools, I submit that there will be an impact. You have 87 single family homes. Are you restricting them from having children? I don't think so.

***Response 3.6-13:*** Refer to Response 3.6-12 regarding the proposed action's impact on schools.

**Comment 3.6-14 (Letter #3, Lee Ross, July 1, 2009):** The "religious" designation sought by the developers will shift a substantial tax burden onto the rest of us to pay for the residents' garbage and sewage removal and snowplowing and all other municipal services.

***Response 3.6-14:*** The Patrick Farm project will be available to the general public and will not exclude anybody who wishes to live there. The project will not have any "religious designation" and will not be exclusively marketed to any demographic population, nor exclude anybody.

**Comment 3.6-15 (Letter #8 and Letter #9, Edward F. Devine, Rockland County Drainage Agency, June 4, 2009):** Based on the information provided and maps available to the RCDA, the site has been determined to be within the jurisdiction of the RCDA. Accordingly, a permit from the RCDA pursuant to the Rockland County Stream Control Act is required. Please have the applicant submit an application to the RCDA immediately. Enclosed is a copy of a permit application and Chapter 846: Rockland County Stream Control Act.

Any further decisions or determinations made by the Town of Ramapo land use boards in this matter should indicate that the site is within the jurisdiction of the RCDA and that a permit from the RCDA is required. The RCDA recommends that the Town of Ramapo ensure that the applicant has secured the necessary permits and approvals from all interested and involved agencies as a prerequisite to granting any final approvals.

***Response 3.6-15:** A comprehensive Stormwater Pollution Prevention Plan (SWPPP) was prepared for Patrick Farm and is included in the DEIS as Appendix D. The SWPPP is a fully engineered and detailed document that will merit a permit from the Rockland County Drainage Agency.*

*A Permit application has been filed with the Rockland County Drainage Agency (RCDA). The RCDA will issue a permit subject to their review and approval of detailed construction plans.*

**Comment 3.6-16 (Letter #11, Adam Peterson, Environmental Analyst, New York Department of Environmental Conservation, Division of Environmental Permits, Region 3, July 3, 2009):** Appendix B includes a "willingness to serve" letter from United Water New York pertaining to the supply of potable water to the subject development. However, this letter, issued on August 25, 2008 expired nine months from issuance and therefore is no longer valid. An updated willingness to server letter should be provided.

***Response 3.6-16:** An updated "Willingness to Serve" letter was provided by United Water NY on August 13, 2009.*

**Comment 3.6-17 (Letter #11, Adam Peterson, Environmental Analyst, New York Department of Environmental Conservation, Division of Environmental Permits, Region 3, July 3, 2009):** Section 3.6.6 page 7 indicates that sanitary wastewater will be discharged through the Rockland County Sewer District (RCSD) #1 waste water treatment plant (WWTP) located in Orangeburg, NY. The DEIS should demonstrate that RCSD #1 and the existing WWTP have sufficient capacity to accommodate the 198,800 gallons/day (GPD) to be discharged. If RCSD #1 does not have sufficient capacity under the existing SPDES sanitary wastewater permit, a modification to this permit will be required, assuming the WWTP has sufficient excess capacity to accommodate this additional discharge. The analysis demonstrating capacity should include an evaluation of existing capacity taking into account other development projects in the area proposing to discharge via RCSD #1.

***Response 3.6-17:** A January 20, 2009 letter from Rockland County Sewer District #1 (RCSD #1) has acknowledged their future acceptance of sewage from Patrick Farm without any issue relating to either plant or permit capacity at the receiving wastewater treatment plant. Nevertheless, we have requested a letter from RCSD #1 explicitly stating that both the treatment and permit capacity exist at the wastewater treatment plant. A response from the RCSD #1 is pending.*

**Comment 3.6-18 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** The sanitary sewers from this development would connect to the District's sewer system.

- a. Upon review of this proposal and requested zone changes, the District has determined that an impact fee will be required, in accordance with the Rockland County Sewer Use Law as last amended in 2006. Impact fees enable the District to invest in future sanitary sewer improvement projects.
- b. The proposed development of this site for 87 1-family residences, 314 townhouses, 72 condominiums and 24 apartments will result in three hundred ninety-one (391) additional sewer units. Therefore, the developer must submit a check in the amount of seven hundred twenty three thousand three hundred fifty dollars (\$723,350.00) payable to Rockland County Sewer District No. 1 within thirty (30) days of Planning Board approval.

***Response 3.6-18:*** Comment noted. The Applicant is prepared to pay all required fees.

**Comment 3.6-19 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** This project lies wholly or partly within Tax Lots 32.11-1-15 (formerly 3./12A1), 32.11-1-16 (formerly 3./12A1), 32.11-1-4 (formerly 3./13A2), 32.11-1-14 (formerly 3./13A2), and 32.14-2-3 (formerly 3./13A2), which the United States Environmental Protection Agency (EPA) has designated as Environmentally Sensitive Areas (ESAs).

- a. Prior to connecting any building to sanitary sewers, the developer must obtain a waiver of the EPA's grant condition, which restricts sewer connections from ESA lots. Any sewer application for these parcels cannot be approved 'until the EPA and New York State Department of Environmental Conservation (DEC) approve the waivers.

***Response 3.6-19:*** Comment noted.

**Comment 3.6-20 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** The District accepts the preliminary design proposal to replace the Route 202 Pump Station, construct a new force main, construct new gravity lines and upgrade the Wilder Road Pump Station in order to accommodate this project. The District will require the design engineer to coordinate and forward the details of the final design to this office for approval.

- a. Page 1-2 of the DEIS states, "The project proposes to upgrade and improve the existing sewer infrastructure which serves the project site. These conceptual plans have been approved by the Rockland County Sewer District #1." However, per Comment 3 above, the District accepts the proposal to upgrade the existing infrastructure but has not yet approved any such plans.

***Response 3.6-20:*** Comment noted. The applicant is working closely with the Rockland County Sewer District #1 (RCSD) staff to insure that the proposed upgrades meet the specification of the RCSD.

**Comment 3.6-21 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** Pages 1-24 and 3.6-7 of the DEIS refer to "chlorinated effluent" and "aerobically digested" sludge.

- a. Sodium hypochlorite is used to disinfect the wastewater, and sodium bisulfite is used to dechlorinate prior to discharging the effluent into the Hudson River.
- b. The sludge is not aerobically digested. The District uses anaerobic digesters.

***Response 3.6-21: Comment noted.***

**Comment 3.6-22 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** Page 3.6-7 of the DEIS states, "Attached in the Appendices of this document is a copy of the Executive Summary from the RCSD#1 Collection System Evaluation and Engineering Report for Order on Consent Compliance". However, the appendices do not contain the above-referenced executive summary.

***Response 3.6-22: Comment noted. The referenced Executive Summary is included as FEIS Appendix E.***

**Comment 3.6-23 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** Page 3.6-8 of the DEIS states, "Figure 3.6-1 shows the approximate path of the proposed force main, which runs through Prosperity Drive." However, the DEIS does not contain the above-referenced figure. Also, according to Drawing No. 4 [Utility Plan (1 of 2)] , the proposed force main will connect to the District's sewer main on Scenic Drive.

***Response 3.6-23: Comment noted. Appendix P of the DEIS includes the Sewer Report approved by RCSD #1 which includes a "Sanitary Sewer Concept & Phasing Plan" that shows the approximate path of the proposed force main.***

**Comment 3.6-24 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** The sewers within this project will connect directly to the District's sewer main on Scenic Drive.

- a. A permit must be obtained from the District, prior to starting the sewerage portion of this job. Details for connecting to the District's sewer must be approved prior to construction.
- b. The contractor must obtain required insurance and sign a waiver to defend, indemnify, save and hold harmless both the **County of Rockland** and **Rockland County Sewer District No. 1** from any claims arising from work performed on our facilities.

***Response 3.6-24: Comment noted. The applicant will secure all necessary approvals and provide all necessary insurance prior to final site plan approval.***



**Comment 3.6-25 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** Rockland County Sewer District No. 1 requires sanitary sewer construction to conform to District standards. This includes but is not limited to relative air, vacuum and deflection testing of mainline sewer and manhole construction. The District must receive and approve certification of test results from a licensed professional engineer before approving the sewers on this project.

*Response 3.6-25: Comment noted. The applicant will secure all necessary approvals prior to final site plan approval.*

**Comment 3.6-26 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** In order to reduce infiltration into the system, the District requires that the precast and doghouse sanitary manhole construction be in accordance with the District's standards. The District's standard details require the joints to have butyl rubber seals with mortar in and out, and then to be coated with "Infi-shield" EPDM rubber seal wrap or approved equal.

*Response 3.6-26: Comment noted. The applicant will ensure the approved site plan is in conformance with RCSD specifications.*

**Comment 3.6-27 (Letter #12, Joseph LaFiandra, Engineer II, County of Rockland Sewer District No. 1, July 7, 2009):** Details for the sanitary sewer house connections are subject to approval by the Town of Ramapo.

*Response 3.6-27: Comment noted. The applicant will secure all necessary approvals prior to final site plan approval.*

**Comment 3.6-28 (Letter #14, Adam Peterson, Environmental Analyst, New York State Department of Environmental Conservation, Division of Environmental Permits, Region 3, July 23, 2009):** Appendix B includes a "willingness to serve" letter from United Water New York (UWNY) pertaining to the supply of potable water to the subject development. However, this letter, issued on August 25, 2008 expired nine months from issuance and therefore is no longer valid. An updated willingness to serve letter should be provided.

*Response 3.6-28: An updated "Willingness to Serve" letter was provided by United Water NY on August 13, 2009.*

**Comment 3.6-29 (Letter #14, Adam Peterson, Environmental Analyst, New York State Department of Environmental Conservation, Division of Environmental Permits, Region 3, July 23, 2009):** Appendix S of the DEIS includes an "Assessment of United Water New York Water Supply Available for New Projects," ("assessment") apparently provided by the Rockland County Department of Health. However, no cover letter was provided indicating the preparer or date of issuance. All information relating to the development of this document should be included within Appendix S. The assessment indicates that projected peak demand for 2008 was 48.4 million gallons per day (MGD) and the United Water New York's available peak supply capacity, at the time of the report, was 50.5 MGD, indicating a surplus of 2.6 MGD available to serve additional development. However, page 25 (enclosed) of the "Order Approving Merger and Adopting Three-Year Rate Plan" ("order") issued by the New York State Public Service Commission (PSC), dated December 14, 2006, indicates the position of Rockland County is as follows:

- "United Water New York has an immediate problem in satisfying peak demand." and
- "United Water New York has not been able to reliably meet the county's peak demand since 1990".

The assessment provided in Appendix S of the DEIS that references the Rockland County Department of Health seems to be contradictory to the information presented within the order. The DEIS should include a written assessment with all supporting data which discusses the ability of United Water New York to deliver the required 198,800 gallons per day (GPD) to this development and how this project's additional demand may impact other water users, whom may already experience unreliable water service during peak usage times. The assessment should also include any pertinent information regarding steps take by UWNY since the drafting of the order in 2006 in an effort to alleviate water shortages during peak demand.

***Response 3.6-29:** As noted, an updated "Willingness to Serve" letter was provided by United Water NY on August 13, 2009. Neither the Applicant nor the Consultants are in a position to provide the written assessment requested. We must take United Water NY at their word if they say they can service this project that they actually can deliver.*

**Comment 3.6-30 (Letter #15, Salvatore Corallo, Commissioner, County of Rockland Department of Planning, July 24, 2009):** Table 3.6-1 illustrates demographic multipliers for population projections for this proposal. A total population of 1,932 is projected based on a multiplier of 3.13 for the townhouses and condominium flats, 4.52 for the single-family homes and 2.51 for the rental apartments. These multipliers seem low given that the number of bedrooms in the townhouses and condominium flats is four and in the single-family homes is five. Appendix B contains correspondence between the applicant's consultants and various emergency service and utility providers. A total potential population of up to 2,300 persons is referenced in these letters. The analysis of the potential impacts of this project on the water supply uses a worst-case scenario that translates into a population of 2,650 rather than the projected population of 1,932 residents. This 37 percent difference is significant and perhaps a more accurate population projection. This department used the 2,650 figure to calculate the applicable multipliers for each type of housing. By our calculation, the multiplier for townhouses and condominium flats would be 5.25 and 6.60 for single-family residences. A consistent population projection figure should be used throughout the DEIS.

***Response 3.6-30:** In order to determine the number of persons and school-age children that would be generated by Patrick Farm, multipliers published by various sources were reviewed to determine which multipliers would be appropriate for the type of housing product that is proposed. A review of the 2000 US Census data for the villages of Suffern, Monsey, Pomona and Spring Valley were reviewed, in addition to the population projections for the design volume of water and sewer utilization. The data were compared to the demographic multipliers in the Burchell and Listokin population research for the Rutgers University Center of Demographic Research published in June 2006, included as Appendix J. Since the Rutgers University data were specific to geographic region and broken down by bedroom count, these multipliers were relied upon to estimate the project's population, including school-age children. For purposes of the population analysis, the population projection for Patrick Farm is based on the demographic information for the "Single family attached and detached categories" of housing types for New York State and is based on the 2000 US Census Bureau data.*

*A summary of the demographic multipliers used in this analysis is provided in Table 3.6-1 of the DEIS.*

**Comment 3.6-31 (Letter #15, Salvatore Corallo, Commissioner, County of Rockland Department of Planning, July 24, 2009):** The DEIS inaccurately states that the RCSD #1 has adequate capacity to treat the Patrick Farm sewage. Since the Route 202 Pump Station is currently operating at capacity and does not have the capacity to convey sewer discharges generated by Patrick Farm, then the RCSD #1 can only treat the Patrick Farm sewage if required improvements are made to the Route 202 pump station and local sanitary sewer infrastructure "down-gradient" of the Pump Station.

*Response 3.6-31: Comment noted. The applicant is prepared to make the necessary improvements to the Route 202 pump station and related "down-gradient" infrastructure.*

**Comment 3.6-32 (Letter #16, Salvatore Corallo, Commissioner, County of Rockland Department of Planning, July 24, 2009):** The Rockland County Sewer District No. 1 (RCSD No. 1) does not have adequate capacity to treat the Patrick Farm sewage because the Route 202 Pump Station is currently operating at capacity. It does not have the capacity to convey sewer discharges generated by Patrick Farm. The RCSD No.1 can only treat the Patrick Farm sewage if required improvements are made to the Route 202 pump station and local sanitary sewer infrastructure "dawn-gradient of the Pump Station. The applicant must address these issues and all, other concerns raised in the RCSD No. 1's letter of July 7, 2009.

*Response 3.6-32: A January 20, 2009 letter from Rockland County Sewer District #1 (RCSD #1) has accepted the preliminary design proposal. No other issues or concerns have been raised by the RCSD #1.*

**Comment 3.6-33 (Letter #19, John F. Lange, Senior Associate for Planning, Frederick P. Clark Associates, Inc.):** Water — the applicant should show the Rockland County Department of Health water status. Does the website show sufficient water for this development in its allowable capacity?

*Response 3.6-33: The Rockland County DOH does not maintain a water status for the public. Their website does not maintain water status or show available capacity.*

**Comment 3.6-34 (Letter #19, John F. Lange, Senior Associate for Planning, Frederick P. Clark Associates, Inc.):** Sewer — please show map of required improvements for Pump Stations and force mains.

*Response 3.6-34: Appendix P of the DEIS is a "Sewer Report" and includes two drawings as follows: A drawing entitled "Sanitary Sewer Concept & Phasing Plan" shows the force main location. A drawing entitled "Existing Sanitary Sewer Map – RCSD #1" shows the locations of the Route 202 and Wilder Road Pump Stations.*

**Comment 3.6-35 (Letter #19, John F. Lange, Senior Associate for Planning, Frederick P. Clark Associates, Inc.):** The comprehensive plan addressed key circulation issues facing the Town of Ramapo including the unnecessary endings of streets with and without cul-de-sacs. Road connections should be completed and cul-de-sacs should be proposed only where no other solution was available. This plan has five cul-de-sacs, two of which are designed to avoid the on-site wetlands and two which are designed to preserve the ridgeline.

*Response 3.6-35: Site Circulation:*

1. *Cul-de-sacs are permitted by the Town of Ramapo Subdivision Regulations and are proposed at appropriate locations for Patrick Farm as follows:*

*Roads "A" & "B" (north end of Road "B"): Cul-de-sacs are utilized at Roads "A" and "B" for the same reasons. They allow the roads to "follow the contours" and to terminate before the road approaches steep terrain which is not suitable for a roadway. In addition they avoid connections to Route 202 which in both cases would not be situated at a favorable sight distance locations. Lastly the traffic circulation pattern has been designed to limit the points of access to State Route 202 which is appropriate for a State road.*

*Road "B" (south end of Road "B") and Road "E": These two cul-de-sacs could join and the DEIS provides two alternate layouts which join them (Figures 5-4 & 5-5) however the proposed plan does not propose to join them with a thru road as depicted on Figure 5-4. Cul-de-sacs "B" and "E" are appropriate because they avoid disturbance to "waters of the US", they avoid existing homes located on Scenic Drive, and they provide a traffic calming benefit by avoiding a long road. It should be noted that the proposed plan has zero disturbance to any waters of the US.*

*Road "D": This cul-de-sac is appropriate because a connection to Route 306 is not necessary and would be situated at a location relatively close to the Route 202 intersection which would not be an ideal traffic design. Bending the road to connect to Road "F" would not be a recommended design because it would likely involve disturbance to either a protected stream or protected wetland or both.*