

Adelaide Camillo
Millbrook, New York 12545

September 3, 2024

Chairperson Susan Meaney
And Members of the TOW Planning Board
Town Hall on Reservoir Drive
Millbrook, NY 12545

RE: Clear Subdivision, Woodstock Road (Arch River Farm)

Dear Chairperson Meaney and Members of the Planning Board:

I quickly reviewed the voluminous Clear subdivision proposal submitted before the early August Planning Board (PB) meeting. I know time is short before your meeting tonight, so I will try to keep these initial questions brief. Please *take your time* to get this right as this complex subdivision of an historic grazing farm and a primarily wet land mass will set a precedent for the next subdivision, and the one after that.

I did a preliminary review of the AKRF memo dated August 5, 2024 and the habitat report and wetland report submitted by Edgewood Environmental Consulting. (*Located on the Planning Board page of the website under 2024 Applications*). I am not privy to what may have changed since your last PB meeting, but here are my questions and comments so far:

- 1) While the AKRF planning consultant memo is very helpful with good suggestions, it does not include any independent biological habitat review. The town needs a qualified independent habitat biologist to walk this property and to properly review the entire application for the benefit of your lay volunteer board. There is a lot of data with impressive charts and maps provided by the developer's consultants. But to the educated observer, there is much to question in their conclusions and too much to list here. A professional independent review by town-hired consultants is not only critical for your own decision making but is a benefit to this community and the environment, especially when species of concern are noted and have been present in this area for decades.
- 2) AKRF rightly suggests in their memo of August 5 (point #18, page 7) that the Town should hire a wetlands expert to review the wetlands report. There is a lot to untangle in the Wetlands Report submitted including the upcoming changes in the laws. Has an independent wetland consultant been hired? These wetlands are part of a vast web of wetlands and water sources as part of the Wappinger Creek Watershed. What flows into these waters matters very much.
- 3) I understand this application was wisely referred to the CAC for review and I believe the CAC has a letter in progress not yet available to the public as of this writing understandably. The CAC would also benefit from a biologist and wetland expert.

- 4) Until the PB itself or anyone walks this land with trained biologists, you cannot possibly know how truly ecologically rich and precious it is. Has the Planning Board walked this land? I know this area well as it is adjacent to the subdivision I challenged for the same issues in 2004. The US Fish and Wildlife Services visited this area at my request in 2004 as it is a known habitat for species of special concern such as the Indiana bat and bog turtle, and a variety of salamanders. I also hired leading wetland ecologists, Michael Klemens, PhD, who wrote the recovery plan for bog turtles for US Fish and Wildlife. Ecologist, Erik Kiviat, PhD, knows the TOW well as he studied it for Hudsonia's report, "Significant Habitats in the Town of Washington." In fact, this entire area on Woodstock Road to route 82 is considered part of a "high conservation priority" in the Hudsonia report, but the town has not formally designated this area and many others as recommended. (Tollefson and Stevens, Significant Habitats in TOW, 2004, p.68, www.hudsonia.org)
- 5) Because of the environmental sensitivity of this property many building restrictions will need to be put in place *in perpetuity* including extended setbacks; restriction from further development since this is a five-acre zone; and carefully placed building envelopes as the AKRF memo discusses also. I did not see any of this on the map submitted.

In closing, I would just like to address those on the Planning Board who questioned the many details of subdivision planning at the last August workshop. I respectfully say, none of these – SEQR, natural inventories, species of concern, building envelopes, setbacks, building restrictions, septic locations, soils, etc. – are out of the ordinary in professional planning circles. In fact, they are not only best practice, but they are also *common practices* in communities that prioritize protecting natural resources and residents from harm.

Your job is unquestionably a very difficult job for any volunteer, and I respect your time and commitment. That is why I urge the town continually to hire more professionals with planning credentials to support your volunteer committee, the ZBA, and the CAC. Applications can be streamlined with the right reviewing talents at the front end before it ever gets to your board saving enormous time and eliminating unnecessary tensions and frustrations.

Thanks so much for listening.

Sincerely,

Adelaide Camillo
Concerned Citizen and Arch River Farm Neighbor