



Town of Washington
Conservation Advisory Commission

DRAFT

Date: June 27, 2025

To: Town of Washington (TOW) Town Board; TOW Planning Board

Cc: Steve Marino, TOW Wetland Consultant

From: TOW Conservation Advisory Commission (CAC)

Re: Killearn Road Project and Wetlands Permit

The CAC is in the process of reviewing the documents that have been made available to it on the Killearn Road project, including the Planning Board Application submitted by the Town Board, dated March 14, 2025, and the Wetlands Permit Application, dated June 18, 2025, with a cover letter dated June 17, 2025. We encourage the Town Board and the Planning Board to make available all relevant documents to the public as soon as possible by posting them to the Town website. This transparency is especially appropriate in a high-profile project such as this one.

We understand that construction to improve the function of Killearn Road is necessary and that Killearn Road is adjacent to wetlands in several places. We have also noted statements in the SEQRA and Wetlands Permit applications to the effect that wetlands disturbances would be less than 100 sq ft or less than 125 cubic feet. However, we have not yet seen any maps or indication of where the disturbances would be. We think that mapping and more detail on the impact to changes in stormwater runoff would be appropriate as the most recent wetlands delineation report made available in connection with the project showed nearby wetlands in a number of places. Given that report, it would be helpful to have detailed plans or information indicating how the necessary construction activity and future runoff would minimize the impact on the wetlands, given how close the wetlands are to the road in several places, and how any impact would be remediated. We urge the Town Board and the Planning Board to make available to the public detailed information on the wetlands and runoff impact and the approved remediation steps. These steps might not be costly at all, and could save the Town money in the long run by mitigating erosion from storms. We urge you to work with the Town's Wetland Consultant or other construction experts to adopt best practices and avoid unnecessary wetlands disturbances.

We also note that the most recent wetlands delineation report made available to us so far is dated May 2, 2023. As you know, New York has adopted new wetlands regulations effective January 1, 2025, so it would appear that NYSDEC would need to be contacted for

a new jurisdictional determination and possibly a permit. It may be that the Town has already done that, but we have not been able to locate the two NYSDEC applications referenced in the June 17, 2025, cover letter to the Town's Wetlands application and the 6/25/2025 AKRF memo. We would like those applications to be made available to the public, along with any responses from the US Army Corps of Engineers (USACE) and/or NYSDEC. The 2023 wetlands delineation report concludes with a recommendation that construction activities be coordinated with the USACE and we have not yet seen any evidence of that; if the documentation is available, it could be included in the wetlands permit application.

We appreciate the opportunity to provide these preliminary comments, and we hope they have been helpful. We would consider more comments once more documents are made public.