

Memorandum:

To: Town of Washington Planning Board
From: Steve Marino, PWS
Date: 10/31/25
Subject: Oak Summit Road Improvements

In response to a request from the Planning Board I reviewed the engineering plans for the proposed road improvements on Oak Summit Road at the intersection with Camby Road, prepared by Colliers Engineering. It has been determined that the proposed work exceeds the criteria established in the Town Code for a permit exemption, therefore a Town Wetland Permit is required. I have walked the site and observed the existing conditions.

I concur with the wetlands delineation as shown on the plans dated 10/21/25. Although the delineation pre-dates the new DEC regulations that went into effect on January 1, it is my opinion that none of the wetlands in this corridor would meet the new regulatory guidelines since none of the "special condition" criteria are met. Specifically, the whole of Oak Summit Road is not in an "urban area" or "significantly flooded" watershed as defined by the new regulations. New York State Natural Heritage mapping does not show any records of rare or threatened plants or animals. Therefore the wetlands in this part of the Town of Washington would not be subject to the new regulations. (While the inquiry to the Fish and Wildlife Service returned bog turtles as a potential species of concern, this did not show up on the State records, and I agree with the conclusions of the 2015 Chazen report that suitable habitat for this species is not available on or in the vicinity of the project site).

While the stream passing under the road is a Class C(T) NYS stream, the wetland itself is not regulated by the DEC. Being a Class C(T) stream, an Article 15 permit is required from the State for work within or adjacent to it. I did observe trout and minnows within the stream on the day of my site visit.

The plans envision a disturbance to wetlands of approximately 1,174 sf, all related to culvert replacement and outlet protection. In the strictest sense, this work would also require approval from the Army Corps of Engineers. In general, any application for disturbance to wetlands of less than 4,356 sf for the purpose of road maintenance is treated as a minor disturbance under Nationwide Permit #14 and would not require a pre-construction notification.

Following review of the plans, I have concerns not about the need for the bridge replacement or potential alternatives, but rather the construction methods and construction sequencing to be employed.

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1. The project plans are not specific about the sequence of activities associated with the bridge replacement, including the removal of the existing deck, the installation of coffer dams, installation of erosion controls, etc. This information is critical to the evaluation of potential impacts.
2. Will the stream be diverted during the demolition of the old bridge and installation of the new?
3. The plans reference a turbidity curtain, but do not show the location, timing or purpose of this practice.
4. What measures will be used to stabilize the embankments on either side of the new bridge after construction?

This information is required before a final analysis of the project can be completed.

That is the extent of my comments at this time. Please let me know if the Board has any additional questions.