

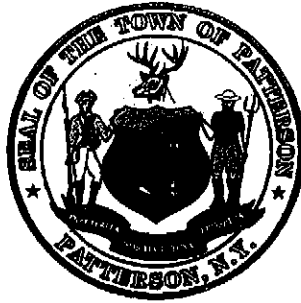
PLANNING DEPARTMENT

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**TOWN OF PATTERSON
PLANNING & ZONING OFFICE**

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July 29, 2010

Town of Patterson
Planning Board
P.O. Box 470
1142 Route 311
Patterson, NY 12563

Re: Watchtower Education Center
Route 22
Tax Map No.14.-1-53, 14.-1-54

DEIS REVIEW

Dear Chairman and Board Members:

I have reviewed the revised DEIS submitted by the Watchtower Education Center on June 1, 2010. At this time I believe all remaining issues have been adequately address and the document is complete and ready for circulation. This memo outlines the next steps that must be taken by the Board, and provides key time frames for each step once the DEIS is determined complete.

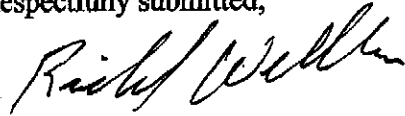
- Notice must be prepared, filed and published in the Environmental Notice Bulletin in accordance with 6NYCRR 617.12
- **Public hearing** - The date scheduled for the public hearing must be more than 15 days after the date of the notice of completion and more than 14 days after the date notice will appear in a newspaper of general circulation. In addition the date of the public hear can not be more than 60 days after publication of the notice of completion.
- **Written Comment Period** - The minimum comment period can not be less than 30 days from publication of the notice of completion and 10 days following any public hearing

I would recommend that at tonight's meeting the Board set a public hearing for September 2, 2010, with a written comment period ending on September 15, 2010. The Board should note that the public

hearing will be held on the the site plan application as well as the draft Environmental Impact Statement.

I trust the Board will find this information useful.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Richard Williams Sr.", written in black ink.

**Richard Williams Sr.
TOWN PLANNER**

cc: Maser Consulting PA
Ted Kozlowski, ECI
Building Department
Curtiss & Leibell, P.C.
Applicant

The ENB SEQRA Notice Publication Form - Please check all that apply

Reset Form

Deadline: Notices must be received by 6 p.m. Wednesday to appear in the following Wednesday's ENB

- Negative Declaration - Type I
- Draft EIS
 - with Public Hearing
 - Generic
 - Supplemental
- Conditioned Negative Declaration
- Draft Negative Declaration
- Final EIS
 - Generic
 - Supplemental
- Positive Declaration
 - with Public Scoping Session

DEC Region # 3 County: PUTNAM Lead Agency: PLANNING BOARD, TOWN OF PATTERSON

Project Title: WATCHTOWER EDUCATION CENTER AMENDED SITE PLAN

Brief Project Description: The action involves . . .

The Watchtower Bible and Tract Society of New York, Inc., (the "applicant") proposes to expand the Watchtower Educational Center (WEC) in the Town of Patterson by adding approximately 904,000 square feet of new interior building space with a footprint of approximately 186,000 square feet. In addition, 434 new parking spaces would be added to the project site, 351 of which would be located in parking garages.

Project Location (include street address/municipality): ROUTE 22, TOWN OF PATTERSON

Contact Person: RICHARD WILLIAMS SR.

Address: P.O. BOX 470, 1142 ROUTE 311 City: PATTERSON State: NY Zip: 12563

Phone: 845-878-6500 Fax: 845-878-2019 E-mail: PLANNING@PATTERSONNY.ORG

For Draft Negative Declaration / Draft EIS: Public Comment Period ends: 10 / 7 / 10

For Public Hearing or Scoping Session: Date: 9 / 2 / 10 Time: 7:30 ~~am~~ pm

Location: PATTERSON TOWN HALL, P.O. BOX 470, 1142 ROUTE 311, PATTERSON, NY 12563

A hard copy of the DEIS/FEIS is available at the following locations:
PATTERSON TOWN HALL

The online version of the DEIS/FEIS is available at the following publically accessible web site:
HTTP:WPATTERSONNY.ORG

For Conditioned Negative Declaration: In summary, conditions include:



Consulting, Municipal & Environmental Engineers
Planners • Surveyors • Landscape Architects

1607 Route 300, Suite 101
Newburgh, NY 12550
Tel: 845.564.4495 • Fax: 845.564.0278

MEMORANDUM

To: Town of Patterson Planning Board

Cc: Rich Williams, Sr.

From: Andrew Fetherston

Date: July 21, 2010

**Re: The Watchtower Bible and Tract Society Amended Site Plan
MC Project No. YPP021**

The following Items have been reviewed:

- Amended Draft Environmental Impact Statement chapters 1,2,3,5,6,9,10,12 & 19, dated June 1, 2010 and prepared by AKRF.
- Overall Construction Phasing Plan, latest revision dated May 12, 2010, sheet CD101.
- Erosion and Sediment Control Plan, latest revision dated May 12, 2009, sheets CE101 & CE106.
- Grading and Drainage Plan, latest revision dated May 12, 2010, sheets CG102 & CG104.
- Landscaping Section 7, latest revision dated May 17, 2010, sheets LD107.
- Site Lighting Plan, latest revision dated May 27, 2010, sheets ES101 & ES102.

We have reviewed the above mentioned application materials. The remaining comments for this application entail detail which shall be addressed during the site plan review process. This application is suitable for circulation.

For clarity, the original comments have been retained and our subsequent comments follow in italics.

COMMENTS TO RESPONSES FROM JUNE 1, 2010 SUBMISSION:

Sheet CE101

1. A level spreader near the temporary construction trailers appears to be proposed to discharge onto a paved area. *A level spreader has been indicated on the plans however the 10' contour topography does not clarify that the discharge will be sheet flow. This comment still requires clarity, applicant shall address during site plan review.*

Sheet CE106

6. The Alternate Excess Soil Area (North Pasture) is channelizing runoff by proposing silt perpendicular to the contours on the east side of the stockpile. Methods for slowing and controlling this concentrated flow should be proposed. *The Applicant needs to clarify the*



amount of land disturbed at any one time. CD101 calls out the disturbed areas for Phases 2, 4 and 6. Comment has been addressed by the applicant.

Sheet CG102

11. Label the proposed contours in the Bus and Visitors Parking Lots. *Add some additional spot elevations to describe the south end of the Visitors Parking Area where it appears the parking area is proposed to be installed in a local topographic depression. This comment has not been addressed, the applicant shall address during site plan review.*

Sheet CG104

13. Unpaved roads are not shown southeast of the Recycling Building, but the grading for the roads are. Show the unpaved roads on this drawing. *Comment has been addressed by the applicant. Please clarify what the two lines represent which bisect Stormwater Pond #2. The applicant has labeled the lines. Applicant should provide additional grading information for the berm. Applicant shall address during site plan review.*

Sheet CS101

18. I request the Building Inspector review the twenty (20) foot road width proposed on the west side of the proposed North Office Building and surrounding the proposed G and H residences. I believe the NYS building code requires a 26 foot wide road due to the height of the proposed building. *No attachment was received regarding correspondence on this matter from Mr. Nicholas Lamberti. Please provide for our review. The applicant has included a copy of Nick Lamberti's January 6, 2010 letter which states he finds the 20 foot wide roadway acceptable pending the remaining 6 foot width be constructed of geoblock grid rated to handle fire apparatus. Comment has been addressed by the applicant.*

CS103

19. A waiver is required for the undersized parking spaces proposed near the Patterson Inn. *Applicant is seeking this waiver. Applicant agrees and the waiver is noted on page 1-13 of the DEIS. Comment has been addressed by the applicant.*

LD101

28. The individual tree symbols for the plant material is easy to read however there is no schedule which quantifies the proposed plantings. Provide in a plant schedule; include botanical/common names, quantity, installation size, root condition, etc. (Typical for each landscape plan in the set). *Applicant proposes to address this comment during site plan review. To be discussed with the Planning Board as acceptable. The applicant has responded that Chapter 9 has been revised. Page 9-18 of Chapter 9 states that, "A more detailed planting schedule will be developed later in environmental review process." Applicant proposes to address this comment during site plan review.*

LD107

46. Provide note referencing the "Existing Vegetation Protection" detail on sheet CG502. *Applicant proposes to address this comment during site plan review. Comment has been addressed by the applicant.*



ES101-ES105

50. Illumination for proposed parking and walkways should meet Illuminating Engineering Society of North America (IESNA) recommended levels. *As mentioned in our response for comment #53, a more specific photometric boundary (study area) for the areas of concern is needed to fully assess this concern. It was mentioned that additional lights would be need installed to meet IESNA requirements, in turn consuming more energy. We do not believe this statement can fully be determined without providing additional study areas. The applicant has provided a 'typical' study area for the driveway, walkways adjacent to a roadway, walkways distant from a roadway and parking areas. The driveway and walkways adjacent to a roadway meet the average IES footcandle recommendations while the parking areas and walkways distant from a roadway fall below IES recommendations. The applicant states in Chapter 12 that the illumination levels as proposed, which are similar to those existing on site for the same areas, have not proven to be safety concern based on 17 years of on-site operational experience. Applicant proposes to further determine the desired target illumination levels with the Planning Board and address this comment during site plan review.*
51. Confirm that the proposed bollard light fixture has a covered/shielded top and not open to night sky. *The applicant has indicated that the bollard lights have a "Dome Top". We further request that the top be solid and not transparent. Comment can be addressed during site plan review. Comment has been addressed by the applicant.*
52. Pole mounted fixtures are proposed at a mounting height of 18 feet. Within a residential zoning district the maximum height allowable is 12 feet however schools, day care centers and churches are exempt. Planning Board to confirm the project is or is not exempt from this requirement. *The applicant has indicated the facility is an "Educational Center" with a primary site activity being an educational use, therefore allowing the exemption under a school designation. The Planning Board shall confirm the applicants response. Planning Board to confirm the facility is an "Educational Center" and the exemption is acceptable. Applicant proposes to address this comment during site plan review.*
53. Point-by-point illumination levels extend well beyond the proposed lighting areas and read at a level of 0.00 footcandles. Provide the photometric boundary utilized for the "Footcandle Calculation Summary" on each sheet. *The applicant has indicated the photometric boundary on the plans. This area represents an illumination study of the project site. The "Footcandle Calculation Summary" should emphasize this but also indicate the illumination levels for the roadways, parking areas and sidewalks so that confirmation of illumination in these areas can be reviewed. See comment #50 above.*

Comments on the Stormwater Management:

56. Information of a number of soil test pits has not been provided (pits 2-14, 21, 26). Provide the test pit logs for these soil test pits. *Comment has been addressed by the applicant, however final stormwater designs and mitigation device locations may require additional soil testing. As previously stated, the requirement of additional testing will be determined during site plan review.*
57. Table 7-4 on page 27 of the Preliminary SWPPP shows an increase (typographical error?) in the proposed condition peak flow for the 100-year storm event for DP 1A. Table 7-4 page 7-12 in Chapter 7, Stormwater Management conflicts with the information in the Preliminary SWPPP. *Minor increases in peak flow are noted in revised Table 7-4 for*



design points 2 and 5 for all storm events studied. This does not meet the requirements of GP-0-10-001. We agree with the applicant that this can be finalized as part of site plan review. We encourage the applicants engineer to show no increase in peak flow.

58. Reporting to the 1/100 cfs is not realistic given the accuracy of the input data. Table 7-4 page 7-12 in Chapter 7, Stormwater Management is showing negligible increases in peak flow. The engineer may wish to round to the nearest cfs. However, this may require additional mitigation as at Design Point 5, the 25 year storm event pre development peak is 4.44 cfs, rounding to 4 cfs and the post development peak 4.82 cfs rounds to 5 cfs. *Minor increases in peak flow are noted in revised Table 7-4 for design points 2 and 5 for all storm events studied. This does not meet the requirements of GP-0-10-001. See comment for #57 above.*
59. There does not seem to be a hydraulic summation of Design Points 1A, 1B and 1C and the upstream areas at the culvert under Route 22. This is a critical design point where the peak flows need to be studied. *Revised watershed maps were not submitted with this application. As such, we request this updated mapping prior to final resolution of this issue. We note that the peak flows for all design storms reported in table 7-4 show a reduction in peak flow to this design point. Response acceptable, applicant has agreed to revise the watershed maps for the FEIS.*
60. *The SWPPP needs to be prepared in accordance with GP-0-10-001, per the revised NYCDEP Final Regulations dated April 4, 2010, section 18-39. Comment has been addressed by the applicant. See comment for #57 above.*
61. *The revised stormwater management report mentions Better Site Design Practices. Runoff Reduction in the Draft Stormwater Management Design manual should be addressed in the stormwater management report. The Runoff Reduction requirement in the Stormwater Management Design Manual has been adopted. The applicant shall address this comment during site plan review.*

Traffic Report. Capacity Analysis Sheet

86. The applicant has analyzed the westbound approach for the signalized intersection of Route 22 & Route 68 as a two lane approach, with an 8.5' dedicated right turn lane, and an 8.5' shared left/thru lane. However, based on a review of the existing conditions, the approach is striped as one approach lane for all turning movements. The applicant should provide data to support the use of two lanes rather than one lane permitted all turning movements. *An explanation as to why the two-lanes were used instead of one could not be found in the updated Traffic Section of the DEIS. Comment has been addressed by the applicant.*



PREVIOUS SUBMISSION COMMENTS TO BE ADDRESSED DURING SITE PLAN REVIEW:

Sheet CE101

2. Temporary Sediment Basin SB-01 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed. *Applicant proposes to address this comment during site plan review.*
3. Show the actual dimension of Sediment Trap ST-01. *Applicant proposes to address this comment during site plan review.*

Sheet CE104

4. Temporary Sediment Basin SB-02 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed. *Applicant proposes to address this comment during site plan review.*

Sheet CE106

5. Temporary Sediment Basin SB-03 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed. *Applicant proposes to address this comment during site plan review.*

Sheet CE107

7. The Existing Excess Soil Area is allowing runoff to discharge from the east and west sides of the stockpile. Additional silt fence and/or other methods for slowing and controlling this runoff from the stockpile should be proposed. *Comment has been addressed by the applicant.*

Sheet CG101

8. Drainage on the uphill (East) side of the Audio-Video Building Addition proposes to pipe storm drainage under the proposed building. While this is strongly discouraged and alternate routes should be investigated, details of this proposal are required. *Comment has been addressed by the applicant.*
9. Show on the plans where roadway access is taken to the 15' wide maintenance road for Stormwater Pond #1. *Comment has been addressed by the applicant.*

Sheet CG102

10. Identify the seven (7) symbols in the Bus Parking Area island and the five (5) symbols in the porous pavement. *Comment has been addressed by the applicant.*

Sheet CG104

12. Outlet protection is required on the storm drain discharging from Storm water Pond #2. *Comment has been addressed by the applicant.*

Sheet CG501

14. On Detail 3, Temporary Sediment Basin, provide dimensions or a table of dimensions where a question mark (?) is presently shown. *Comment has been addressed by the applicant.*



15. On Detail 3, Temporary Sediment Basin, provide stabilized outlet dimensions, which are not presently shown on the plans as stated on the detail. ***Applicant proposes to address this comment during site plan review.***
16. Detail 4, Earth Dike identify each dike on the plans as A-1, B-5 etc. Clarify if a perimeter dike or earth dike is proposed based on constraints like contributing drainage area, etc. An earth dike may be required over a perimeter dike north of the Audio-Video Building Addition. ***Applicant proposes to address this comment during site plan review.***

Sheet CG503

17. Specify the filter fabric on the perforated riser proposed on Detail 1 – Pipe Outlet Sediment Trap. ***Applicant proposes to address this comment during site plan review.***

Sheets CS104 and CS105

20. Dimension the overflow parking (diagonal). ***Comment has been addressed by the applicant.***

Sheet CU101

21. The water and storm sewer does not appear to have 10 feet of horizontal separation. Clarify how the potable water system is being protected. ***Comment has been addressed by the applicant.***

Sheet LD101

22. General note #2, Provide a planting schedule (i.e. species, names, quantity, installation size, spacing, etc.) and planting design for the proposed roof top plantings. ***Applicant proposes to address this comment during site plan review.***
23. General note #3, detail the proposed seed mixture for the mowable strip along the roadway (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review.***
24. General note #4, provide the desired species or specify the supplier for the native wildflower mixture (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review.***
25. Relocate the Norway Spruce proposed to be planted with in the stormwater basin #1 maintenance road. ***Comment has been addressed by the applicant.***
26. Proposed plantings are to be installed on top of underground utilities in numerous locations. Revise planting layout as necessary (Typical for each landscape plan in the set). ***The applicant has addressed the majority of the utility conflicts however others still remain. Further review by the applicant will be required and can be addressed during site plan review.***
27. Provide a planting scheme and schedule for the proposed areas labeled “Various Shrubs to be Determined Later” (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review.***
29. Plant symbol for the White, Black & Colorado Spruce use the same tree symbol. Provide labels to differentiate. ***Comment has been addressed by the applicant.***
30. Identify the existing tree symbols to the legend (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review.***



31. Clarify planting hatches which are not listed in the legend (Typical for each landscape plan in the set). *Comment has been addressed by the applicant.*
32. This plan is proposing plantings on the maintenance road. Confirm that this will be a suitable, drivable surface. *Applicant proposes to address this comment during site plan review.*
33. Confirm that the plantings proposed for the stormwater basin berm are mowable lawns, where visible signs of seepage and other sources of failure would be detectable. *Applicant proposes to address this comment during site plan review.*
34. It appears ½ the road by the North Office Building is proposed to be planted. Please clarify the surface treatment in this area. *Comment has been addressed by the applicant.*

Sheet LD102

35. General note #2, does not provide a planting scheme or schedule for the proposed plant material to be installed for the converted woods areas. *Applicant proposes to address this comment during site plan review.*
36. Additional spacing for growth should be provided for the proposed Thundercloud Plum plantings at the access drive to the bus/visitor parking area. *Applicant proposes to address this comment during site plan review.*

Sheet LD103

37. Refer to the comments above for LD101 & LD102 regarding additional information on plant material. *Applicant proposes to address this comment during site plan review.*

Sheet LD104

38. Existing and proposed tree symbols are depicted in a similar boldness. Clarify the difference. *The existing plant material has been given a gray-tone while the proposed plant material is black. Comment has been addressed by the applicant.*
39. An alternate plant selection, preferably native, should be provided for the Crimson King Norway Maple which is considered an invasive species. *Comment has been addressed by the applicant.*
40. A partly graded serpentine road is shown west of the road adjacent to storm water basin #2. The purpose of this road needs to be clarified. *This has been removed from the plan. Comment has been addressed by the applicant.*
41. Similar to stormwater basin #1, this plan is proposing plantings on the maintenance road. Confirm that this will be a suitable, drivable surface. *Applicant proposes to address this comment during site plan review.*

Sheet LD105

42. Provide construction details for the proposed gates and fencing at the site entrance on Route 22. *Applicant proposes to address this comment during site plan review.*
43. Adjust location of the proposed Norway Spruce at intersection to improve site distance. *Applicant proposes to address this comment during site plan review.*
44. Additional spacing for growth should be provided for the proposed Thundercloud Plum plantings at the access drive to the bus/visitor parking area. *Applicant proposes to address this comment during site plan review.*



Sheet LD106

45. General note #3, detail the proposed pasture seed mixture. *Applicant proposes to address this comment during site plan review.*

Sheet LD107 - Sheet LD107 was not provided in the revised DEIS material.

47. Provide tree species and caliper to each of the trees to be removed. *Applicant proposes to address this comment during site plan review.*
48. Add the following "Tree Protection Notes:"
- Tree protection fencing to be installed along the proposed disturbance limit line and prior to any clearing or grubbing.
 - There shall be no storage of construction equipment or materials outside the clearing limit. No construction activity is permitted outside of the proposed clearing limits.
 - Fencing should remain in good condition for the duration of the construction period. Damaged fencing shall be repaired within one (1) day of occurrence.
- Applicant proposes to address this comment during site plan review.*

Sheet AS102

49. Although this plan shows a layout of buildings supposedly meeting the zoning height requirements, the feasibility of this layout is in question as no storm water facilities are proposed to mitigate for this increased impervious coverage. The West Office Building and K Residence are shown on AS102 in areas to be used for stormwater basins on the preferred site plan set. *Alternate locations for storm water facilities have been provided. Comment has been addressed by the applicant.*

Sheets ES101-ES105 – Sheet ES103 does not exist in the set.

54. Per the plan notes, lighting calculations only include the proposed lighting fixtures. In areas where proposed lighting is to be installed and existing lighting in the area will contribute to illumination levels, provide the levels of existing lighting as well. *Comment has been addressed by the applicant.*

Comments on the Stormwater Management:

55. Soil test locations have been shown on drawing C101, Site improvements have been shown on C102, and Soil types are noted on the pre and post drainage maps, drawings C1 and C2. In reviewing the soil test locations vs the proposed improvements vs the soil types, it is apparent additional testing is required. For example, in the vicinity of the proposed pervious parking near Existing Building C, The Patterson Inn, no soil testing has been done and the soil type (SbC) is noted to have moderate to slow permeability. Testing is required at all proposed areas of permeable pavement. *Applicant proposes to address this comment during site plan review.*

Appendix G

62. Page 1-2, 1st line. The report is a Condensed Report Format as stated, however this format is only acceptable for small acreage projects, e.g., cell towers and well pads. The consultant should have used the standard format. *Comment has been addressed by the applicant.*



63. The consultant did not develop an adequate site sensitivity model. The consultant correlated site sensitivity to prior disturbance, which is exactly what the SHPO says not to do. The discussion should be based on the site types likely to be identified that consider both ecological and cultural factors and their correlation to documented archaeological sites. Variables used to develop this model include: landform, soil type, depositional context, hydrology, geology, and floral and faunal communities. Values for these variables should be compared across the existing site record in order to formulate a sensitivity model that considers access to resources and transportation routes as well as the suitability of specific landforms for occupation. Based on the results of background research, the project area should be stratified into three probability rankings. ***Comment has been addressed by the applicant.***
64. Page 3-2, 5th paragraph. O'Conner's 1854 map of Putnam County is referenced, however it is not included in the report. ***Comment has been addressed by the applicant.***
65. Figure 2. The consultant's definition of the APE is inadequate. Segments 2, 3, and 4 are isolated and the means to access those areas should be considered, as well as any infrastructure improvements that may be extended to those areas. ***Comment has been addressed by the applicant.***
66. The report recommends archaeological testing, but lacks specifics. ***Comment has been addressed by the applicant.***

Chapter 12

67. See previous discussion regarding the APE. ***Comment has been addressed by the applicant.***
68. The methodology for the architectural survey is not clear. ***Comment has been addressed by the applicant.***
69. Page 12-8, *Potential Architectural Resources*. It doesn't appear that an intensive-evaluation of the structures was completed, therefore it is not possible to make determination of non-eligibility. ***Comment has been addressed by the applicant.***
70. See previous discussion regarding site sensitivity. The report refers to "potentially sensitive"; an adequate model should be developed to qualify sensitivity to low, medium, or high. ***Comment has been addressed by the applicant.***

Geotechnical

71. We reviewed the report and support documentation prepared by CHA dated 5/23/08. It is preliminary and relates to the buildings and is comprehensive and applicable. The report does not specifically address site improvements as roadwork, cut and fill slopes and pavement subgrades, and stormwater management to include percolation characteristics. The contents of the report, however, would be very useful for the site improvement preliminary design process. ***Comment noted by applicant, no response needed.***

Traffic Review

The following comments have been generated based on our review of the following documents:

Chapter 10: Traffic, Parking, and Public Transportation
Plan Sheets G-001, C-101, C-102, CS101, CS102, CS103, CS104, & CS105



Traffic Report

72. The traffic counts were conducted on Wednesday May 28th and Thursday May 29th 2008. For the year 2008, Memorial Day occurred on Monday May 26th. Generally, traffic conditions are less intense during holiday weeks due to commuters being absent from the roadway while on vacation. Therefore, the base conditions which were collected by the applicant may not represent the typical traffic conditions during non-holiday weeks. The applicant should provide evidence that the manual turning counts were not impacted by the holiday week, or the applicant should recount the study intersections during a non-holiday week and revise the traffic report accordingly. ***Comment has been addressed by the applicant.***
73. The applicant provides capacity analysis for the AM, PM, Later PM and Saturday Mid-Day peak hours. The applicant should provide data as to the typical operation of the facility on Sunday mornings. ***Comment has been addressed by the applicant.***
74. To establish the Background Growth portion of the No-Build traffic conditions, the applicant has increased the existing traffic volumes by an annual growth rate of 1.5%. The applicant should provide support for the use of a 1.5% annual growth rate. ***Comment has been addressed by the applicant.***
75. The applicant has generated or obtained the site generated trips for each of the development located adjacent to, or within the project study area, anticipated to be operational by the build year of 2014. The applicant should specify if the site generated trips for each development were generated as part of this report, or obtained from a traffic report previously conducted. For those site generated trips which were taken from an obtained traffic report, the applicant should include the volume figures from each referenced report within the appendix. Where the site generated trips have been generated by the applicant, a trip distribution figure should be prepared that depicts the distribution of each development. ***Comment has been addressed by the applicant.***
76. The applicant states that The Institute of Transportation Engineers (ITE) does not provide trip generation rates for the proposed improvements. If this were considered as one large development, this statement would be true; however, the applicant later states that only the residential portion of the development will create an increase in site generated trips. ITE does provide trip generation rates for residential uses. The applicant should utilize the trip generation rates contained within the ITE Trip Generation Manual to determine the site generated trips due to the increase in residential units. ***Comment has been addressed by the applicant.***
77. The applicant has estimated the increase of site generated trips for the proposed facility by creating trip generation rates based on the manual turning counts conducted at the site driveway during the AM, PM, Late PM, and Saturday Mid-Day peak hours. The trips rates determined by the applicant utilize the number of residents as the independent variable to determine the peak hour trips associated with the increase in residential units. The applicant states the other site improvements (Audio-Video Addition, Maintenance Building, North Office Building and other smaller buildings) will not create an increase in the site generated trips. The applicant should provide substantial evidence to support the claim that the additions (other than the increase in residential units) will not create an increase in site generated trips. It would appear, based on the parking proposed underneath the "North Office Building" and "Maintenance Building," that the applicant anticipates some sort of parking demand for these buildings. Therefore, one could logically anticipate an increase of trips generated by the development due to the



additional buildings, in addition to the increase from the residential units. *Comment has been addressed by the applicant.*

78. The applicant states the trip distribution of the site generated trips was determined from “information obtained from the applicant on its residents’ trip patterns.” The applicant should submit this information for review, and explain the methodology for collecting such information. *Comment has been addressed by the applicant.*

Circulation

79. The applicant should elaborate as to the anticipated rate of bus arrivals, and the ability of the site to accommodate large numbers of busses arriving coincidentally. *Comment has been addressed by the applicant.*
80. The applicant shall submit turning templates to depict a bus successfully navigating the proposed bus parking area. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*
81. The applicant should specify the anticipated design vehicle for the development, and provide vehicle turning diagrams depicting such vehicle navigating the site. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*
82. The applicant shall provide data explaining how and where vehicles will turn around after utilizing the over flow parking area depicted on Sheet CS104. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*
83. The application shall submit a circulation plan for the underground parking areas. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*

Parking

84. The applicant shall submit calculations showing that the proposed parking supply shall meet the anticipated parking demand for the development. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*

Capacity Analysis Sheet

85. The applicant has utilized a 30% Right Turn on Red (RTOR) reduction for each signalized intersection within the study area, where such movement exists. The Highway Capacity Manual (HCM), which sets the standard methodology for such reductions, recommends that field counts be conducted to establish the number of right turns which occur during the red phase for each movement at each signalized intersection. Where no such data exists, HCM specifically states that no RTORs should be utilized. The use of a RTOR reduction will have a large impact on the results of the capacity analysis. Therefore, the applicant should provide counts which justify the use of 30% RTOR reduction for each right turn movement at each signalized intersection. *Comment has been addressed by the applicant.*
87. The applicant should submit capacity analysis summary sheets that depict the Peak Hour Factor (PHF) utilized for the analysis of each signalized intersection. It is noted that the “Short Report” contained within the Highway Capacity Software Plus (The software utilized by the applicant for capacity analysis) provides such data, and could be included for each signalized intersection. *Comment has been addressed by the applicant.*



Plan Review

88. Our general review of the site plan is that safe pedestrian circulation is lacking between the proposed parking/bus area, and the main portion of the site. To address such, the applicant should revise or submit additional plans depicting the following per the Manual of Uniform Traffic Control Devices (MUTCD) and local requirements; crosswalks with appropriate signage, stop bars, sidewalks to/from the proposed overflow parking area, speed limit signs and stop signs. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*

Review of Economic Analysis

89. The economic analysis prepared for the Watchtower Education Center (WEC) is a thorough analysis that addresses the requirements of the DEIS scoping document. The analysis used the Regional Input-Output Modeling System (RIMS II) developed by the U.S. Department of Commerce to project regional economic impacts as well as a traditional analysis of tax payments to local jurisdictions in comparison to the services required from the Town, County and local school district. Of note is the fact that the WEC is exempt from federal, state and local taxes due to the applicant's status as a tax exempt organization. This is especially significant given the assessed value of Watchtower holdings was \$177,181,900 in 2008. *Comment has been addressed by the applicant.*
90. Despite the tax exempt status Watchtower does voluntarily pay taxes on the Patterson Inn which provides lodging for visitors and guests. The Patterson Inn had an assessed value of \$14,850,300 in 2008 (approximately 8% of total Watchtower holdings) and \$344,563 of tax payments were made to the various taxing jurisdictions (see table following). Another Watchtower holding, Valley Farms Corporation, also voluntarily pays taxes but those tax payments only amounted to a combined total of \$414.93 for all taxing jurisdictions in 2008.

Patterson Inn – 2008 Tax Payments

Taxing Jurisdiction	Taxes Paid
Putnam County	\$ 30,413
Town of Patterson	\$ 46,429
Patterson Library	\$ 4,180
Patterson Fire District No. 1	\$ 10,942
Park District	\$ 1,301
Carmel Central School District	\$251,298
Total	\$344,563
Sources: Applicant's Economic Analysis and Town of Patterson Tax Receiver's Office, 2008 County and Town Tax Bill, and 2008-2009 Carmel Central School District Tax Bill.	

Comment has been addressed by the applicant.

91. Although Watchtower contributed only a modest sum in tax payments given the size and assessed value of the holdings, this is tempered by the fact that very little is required in the way of services from the Town of Patterson, Putnam County and Carmel Central School District. WEC properties are provided with 24 hour private security. An on-site infirmary with two full-time physicians and 16 registered nurses and on-site ambulance is



provided and there are 14 emergency medical technicians (EMT's) on site. Recreational facilities are provided on site as are library facilities. There are no school-aged children residing at the WEC so there is no demand on the Carmel Central School District. Refuse is handled by a private contractor under contract to WEC. The only demands placed on local services are limited to medical services for WEC residents with more serious medical conditions who must be treated at area hospitals, and fire protection and police protection services. Fire protection services are provided by the Patterson Fire District and police protection is provided by the County Sheriff and New York State Police. ***Comment has been addressed by the applicant.***

92. The economic analysis includes the secondary or induced impacts flowing from the construction of the WEC project. This analysis is performed using the RIMS II regional input-output model. A primary input to the model is the number of construction jobs and the salaries associated with those jobs. It is projected that 166 new construction jobs would be created during the four year construction period (664 person years for the combined four years). This total number is apparently used as input to the model. However, it is stated in the economic analysis that it is anticipated the 75 percent of the construction labor demand would be met through volunteers. If this is the case then the regional economic impact is overstated since the volunteers would not be drawing the additional or new salary that was input to the model. ***Comment has been addressed by the applicant.***

Well Pump Test Data – Comments #22-#27 from Mr. Rich Williams, Town Planner

The Pumping Test Report dated December 2009 prepared by C.A. Rich Consultants included in Appendix C7 describing the installation and testing of two additional Sand and Gravel wells on the property was reviewed and appears to be a comprehensive and accurate evaluation of potential impacts to the local groundwater system and surrounding groundwater users if these wells are utilized in the future.


Bible and Tract Society of New York, Inc.
Design/Build Department
25 Columbia Heights, Brooklyn, NY 11201-2483, U.S.A.
Phone: (718) 560-5000 Fax: (718) 560-8827

May 31, 2010

Town of Patterson
Planning Board
P.O. Box 470
Patterson, New York 12563

Attn: Richard Williams, Sr., Town Planner

Re: Watchtower Educational Center Revised Application

Dear Mr. Williams:

Enclosed is a compact disc with the revisions to the preliminary Draft Environmental Impact Statement (pDEIS) based on the comments dated May 6, 2010, from you and the Town Engineer, Andrew Fetherston. The changes in the documents have been flagged for your attention.

As you requested, we met with Ron Taylor from the Historical Society to discuss his input on the pDEIS. As a result of that meeting, edits were made to Chapter 12 and Appendix G.

We appreciate your consideration of this information, and if you have any further questions, we would be glad to respond. If possible, we would be ready to support a public hearing as early as July 1, 2010. Please feel free to contact Joel Heier at (845) 306-1000.

Sincerely,



Enrique Ford, AIA, R.A.
Design/Build Department

Enclosure

c: Richard Eldred, P.E., P.L.S.
Joel Heier

RESPONSES TO COMMENTS OF TOWN PLANNER and TOWN ENGINEER

May 31, 2010

COMMENTS FROM TOWN PLANNER ON DEIS:

1. Chapter 1.B “Effects on the Use and Conservation of Energy Resources” (page 1-11). A discussion of the proposed upgrades to the NYSEG Haviland Hollow substation should be discussed. The DEIS acknowledges that “some additions to support the increased electric demand at the WEC” due to an increase in electric usage from 2.6 MW to 3.5 MW. NYSEG is also regulated under the Town’s Zoning Requirements, and any changes to the substation might require NYSEG to obtain site plan approval. More importantly, it appears that the substation is located in the 100’ regulated buffer of a State and Town-regulated wetland, and any expansion of the facility would require State and local wetland permits. Since the WEC expansion is dependent on expansion of the substation, the need to identify the proposed changes to the substation in the DEIS is necessary.

Response:

After further consultation with NYSEG, Chapters 1, 6, and 19 have been revised.

2. Chapter 2.B "Project Description and Site Definition" (Page 2-2). The project proposes 421 new parking spaces for the buildings associated with the WEC, and additional stalls for the Inn. The project proposes 229 one-bedroom units and 58 studio apartments, however with changes in other buildings, only 250 new residential units. Chapter 1, Project Description provides that there will be 500 new residences after the facility is expanded. The method to determine the parking demand should be provided i.e., 1 space for each residential unit, etc. In addition the DEIS should explain the difference between the number of one-bedroom and studio apartments that will be provided and the number of new residents that will be staying at the facility.

Response:

Chapters 1 and 2 have been revised.

3. Chapter 3.D "Probable Impacts of the Proposed Project, Zoning" (Page 3-7). A brief discussion of the height variances that are needed is provided in this section, but no discussion is provided concerning the “probable impacts” or mitigation. While there may be no visual impacts, I don’t agree with the assessment made by the Applicant that “These exceptions were allowed under a previous height variance from the Patterson ZBA. Therefore, no significant adverse impacts to zoning are expected.”

Response:

Chapter 3 has been revised.

4. Chapter 3. (Page 3-8) Patterson’s Zoning Code permits a building coverage of 15% for educational centers. I had initially commented on the existing and proposed building coverage for the site. Although a response has been provided, I have not had an opportunity to confirm the assessment provided by the Applicant concerning the existing, proposed or existing building coverage had a variance not been granted. Comments regarding building coverage will be incorporated into any comments on the DEIS.

Response:

The applicant looks forward to receiving this comment during the public review process.

5. Table 5-2 shows the area of disturbance as 57.1 acres. Chapter 1.B “Natural Resources” (Page 1-5) states that total site disturbance will be 49.1 acres. (Also “Construction” pg 1-8). If the difference between the area of disturbance shown on Table 5-2, and the area of disturbance provided in Chapter 1 are areas of overlap between the phases, this should be noted.

Response:

The existing note prior to Table 5-2 was changed to bold font.

6. Chapter 6.B, “Aquifer Recharge” states that the “The five contiguous WEC property parcels, totaling 709.3 acres.... The current impervious land surface on the Watchtower parcels is approximately 39.6 acres”. It appears that the impervious coverage provided was just for the development on the east side of Route 22, and does not include the impervious area on the west side of Route 22, which would bring the total site impervious coverage closer to 49.7 acres.

Response:

Chapter 6 has been revised.

7. Chapter 10.F, “Potential Traffic signal at the NYS Route 22/WEC Main driveway” suggests that the Town and NYS DOT consider conducting a warrant study. Any traffic analysis should be conducted at a sufficient level to determine the level of impacts and mitigation required. This includes any evaluation of whether signalization of WEC driveway intersections with NYS Route 22 is required.

Response:

The reference to the Town conducting the signal warrant study has been removed from Chapter 10 of the DEIS. The potential need for signalization (signal warrant study) of the NYS Route 22/WEC Main Driveway intersection will be based on the NYSDOT review of the DEIS traffic study and will be addressed between the DEIS and FEIS.

COMMENTS FROM TOWN ENGINEER ON AMENDED SITE PLAN:

Sheet CE101:

1. A level spreader near the temporary construction trailers appears to be proposed to discharge onto a paved area. *A level spreader has been indicated on the plans however the 10' contour topography does not clarify that the discharge will be sheet flow.*
2. Temporary Sediment Basin SB-01 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed. *Applicant proposes to address this comment during the site plan review.*
3. Show the actual dimension of Sediment Trap ST-01. *Applicant proposes to address this comment during the site plan review.*

Response:

1. Sheet CE101 has been revised; see revision dated May 12, 2010.
2. The applicant will address this comment during the site plan review.
3. The applicant will address this comment during the site plan review.

Sheet CE104

4. Temporary Sediment Basin SB-02 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed. *Applicant proposes to address this comment during the site plan review.*

Response:

The applicant will address this comment during the site plan review.

Sheet CE106

5. Temporary Sediment Basin SB-03 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed. *Applicant proposes to address this comment during the site plan review.*

Response:

The applicant will address this comment during the site plan review.

6. The Alternate Excess Soil Area (North Pasture) is channelizing runoff by proposing silt perpendicular to the contours on the east side of the stockpile. Methods for slowing and controlling this concentrated flow should be proposed. *The Applicant needs to clarify the amount of land disturbed at any one time.*

Response:

Sheets CD101 and CE106 have been revised; see revision dated May 12, 2010.

Sheet CE107

7. The Existing Excess Soil Area is allowing runoff to discharge from the east and west sides of the stockpile. Additional silt fence and/or other methods for slowing and controlling this runoff from the stockpile should be proposed. *Comment has been addressed by the applicant.*

Response:

The drawing was previously revised; see revision dated November 25, 2009.

Sheet CG101

8. Drainage on the uphill (East) side of the Audio-Video Building Addition proposes to pipe storm drainage under the proposed building. While this is strongly discouraged and alternate routes should be investigated, details of this proposal are required. *Comment has been addressed by the applicant.*
9. Show on the plans where roadway access is taken to the 15' wide maintenance road for Stormwater Pond #1. *Comment has been addressed by the applicant.*

Response:

8. The drawing was previously revised; see revision dated July 24, 2009.
9. The drawing was previously revised; see revision dated July 24, 2009.

Sheet CG102

10. Identify the seven (7) symbols in the Bus Parking Area island and the five (5) symbols in the porous pavement. *Comment has been addressed by the applicant.*
11. Label the proposed contours in the Bus and Visitors Parking Lots. *Add some additional spot elevations to describe the south end of the Visitors Parking Area where it appears the parking area is proposed to be installed in a local topographic depression.*

Response:

10. The drawing was previously revised. The latest revision also includes this information; see revision dated May 12, 2010.
11. Sheet CG102 has been revised; see revision dated May 12, 2010.

Sheet CG104

12. Outlet protection is required on the storm drain discharging from Storm water Pond #2. *Comment has been addressed by the applicant.*
13. Unpaved roads are not shown southeast of the Recycling Building, but the grading for the roads are. Show the unpaved roads on this drawing. *Comment has been addressed by the applicant. Please clarify what the two lines represent which bisect Stormwater Pond #2.*

Response:

12. The drawing was previously revised. The latest revision also includes this information; see revision dated May 12, 2010.
13. Sheet CG104 has been revised; see revision dated May 12, 2010.

Sheet CG501

14. On Detail 3, Temporary Sediment Basin, provide dimensions or a table of dimensions where a question mark (?) is presently shown. *Comment has been addressed by the applicant.*
15. On Detail 3, Temporary Sediment Basin, provide stabilized outlet dimensions, which are not presently shown on the plans as stated on the detail. *Applicant proposes to address this comment during site plan review.*
16. Detail 4, Earth Dike identify each dike on the plans as A-I, B-5 etc. Clarify if a perimeter dike or earth dike is proposed based on constraints like contributing drainage area, etc. An earth dike may be required over a perimeter dike north of the Audio-Video Building Addition. *Applicant proposes to address this comment during site plan review.*

Response:

14. The drawing was previously revised; see revision dated December 9, 2009.
15. The applicant will address this comment during the site plan review.
16. The applicant will address this comment during the site plan review.

Sheet CG503

17. Specify the filter fabric on the perforated riser proposed on Detail 1 - Pipe Outlet Sediment Trap. *Applicant proposes to address this comment during site plan review.*

Response:

The applicant will address this comment during the site plan review.

Sheet CSI01

18. I request the Building Inspector review the twenty (20) foot road width proposed on the west side of the proposed North Office Building and surrounding the proposed G and H residences. I believe the NYS building code requires a 26 foot wide road due to the height of the proposed building. *No attachment was received regarding correspondence on this matter from Mr. Nicholas Lamberti. Please provide for our review.*

Response:

A hardcopy was provided at the May 14, 2010, meeting. An additional copy is included on the enclosed compact disc provided to the Town Planner.

CS103

19. A waiver is required for the undersized parking spaces proposed near the Patterson Inn. *Applicant is seeking this waiver.*

Response:

The applicant agrees and has noted this need in the DEIS, Chapter 1.

CS104 and CS105

20. Dimension the overflow parking (diagonal). *Comment has been addressed by the applicant.*

Response:

The drawing was previously revised; see revision dated December 25, 2009.

CU101

21. The water and storm sewer does not appear to have 10 feet of horizontal separation. Clarify how the potable water system is being protected. *Comment has been addressed by the applicant.*

Response:

The drawing was previously revised; see revision dated December 2, 2009.

LD101

22. General note #2, Provide a planting schedule (i.e. species, names, quantity, installation size, spacing, etc.) and planting design for the proposed rooftop plantings.

23. General note #3, detail the proposed seed mixture for the mowable strip along the roadway (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review.***
24. General note #4, provide the desired species or specify the supplier for the native wildflower mixture (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review.***
25. Relocate the Norway Spruce proposed to be planted with in the stonnwater basin #1 maintenance road. ***Comment has been addressed by the applicant.***
26. Proposed plantings are to be installed on top of underground utilities in numerous locations. Revise planting layout as necessary (Typical for each landscape plan in the set). ***The applicant has addressed the majority of the utility conflicts however others still remain. Further review by the applicant will be required and can be addressed during site plan review.***
27. Provide a planting scheme and schedule for the proposed areas labeled "Various Shrubs to be Determined Later" (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review.***
28. The individual tree symbols for the plant material is easy to read however there is no schedule which quantifies the proposed plantings. Provide in a plant schedule; include botanical/common names, quantity, installation size, root condition, etc. (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review. To be discussed with the Planning Board as acceptable.***
29. Plant symbol for the White, Black & Colorado Spruce use the same tree symbol. Provide labels to differentiate. ***Comment has been addressed by the applicant.***
30. Identify the existing tree symbols to the legend (Typical for each landscape plan in the set). ***Applicant proposes to address this comment during site plan review.***
31. Clarify planting hatches which are not listed in the legend (Typical for each landscape plan in the set). ***Comment has been addressed by the applicant.***
32. This plan is proposing plantings on the maintenance road. Confirm that this will be a suitable, drivable surface. ***Applicant proposes to address this comment during site plan review.***
33. Confirm that the plantings proposed for the stormwater basin berm are mowable lawns, where visible signs of seepage and other sources of failure would be detectable. ***Applicant proposes to address this comment during site plan review.***
34. It appears ~ the road by the North Office Building is proposed to be planted. Please clarify the surface treatment in this area. ***Comment has been addressed by the applicant.***

Response:

22. The applicant will address this comment during the site plan review.
23. The applicant will address this comment during the site plan review.
24. The applicant will address this comment during the site plan review.
25. The drawing was previously revised; see revision dated April 15, 2009.
26. The applicant will address this comment during the site plan review.
27. The applicant will address this comment during the site plan review.
28. Chapter 9 has been revised.
29. The drawing was previously revised; see revision dated April 15, 2009.
30. The applicant will address this comment during the site plan review.
31. The drawing was previously revised; see revision dated April 15, 2009.
32. The applicant will address this comment during the site plan review.
33. The applicant will address this comment during the site plan review.
34. The drawing was previously revised; see revision dated April 15, 2009.

LD102

35. General note #2, does not provide a planting scheme or schedule for the proposed plant material to be installed for the converted woods areas. *Applicant proposes to address this comment during site plan review.*
36. Additional spacing for growth should be provided for the proposed Thundercloud Plum plantings at the access drive to the bus/visitor parking area. *Applicant proposes to address this comment during site plan review.*

Response:

35. The applicant will address this comment during the site plan review.
36. The applicant will address this comment during the site plan review.

LD103

37. Refer to the comments above for LD101 & LD102 regarding additional information on plant material. *Applicant proposes to address this comment during site plan review.*

Response:

The applicant will address this comment during the site plan review.

LD104

38. Existing and proposed tree symbols are depicted in a similar boldness. Clarify the difference. *The existing plant material has been given a gray-tone while the proposed plant material is black. Comment has been addressed by the applicant.*
39. An alternate plant selection, preferably native, should be provided for the Crimson King Norway Maple which is considered an invasive species. *Comment has been addressed by the applicant.*
40. A partly graded serpentine road is shown west of the road adjacent to storm water basin #2. The purpose of this road needs to be clarified. *This has been removed from the plan. Comment has been addressed by the applicant.*
41. Similar to stormwater basin # 1, this plan is proposing plantings on the maintenance road. Confirm that this will be a suitable, drivable surface. *Applicant proposes to address this comment during site plan review.*

Response:

38. The drawing was previously revised; see revision dated July 9, 2009.
39. The drawing was previously revised; see revision dated July 9, 2009.
40. The drawing was previously revised; see revision dated July 9, 2009.
41. The applicant will address this comment during the site plan review.

LD105

42. Provide construction details for the proposed gates and fencing at the site entrance on Route 22. *Applicant proposes to address this comment during site plan review.*
43. Adjust location of the proposed Norway Spruce at intersection to improve site distance. *Applicant proposes to address this comment during site plan review.*
44. Additional spacing for growth should be provided for the proposed Thundercloud Plum plantings at the access drive to the bus/visitor parking area. *Applicant proposes to address this comment during site plan review.*

Response:

42. The applicant will address this comment during the site plan review.
43. The applicant will address this comment during the site plan review.
44. The applicant will address this comment during the site plan review.

LD106

45. General note #3, detail the proposed pasture seed mixture. *Applicant proposes to address this comment during site plan review.*

Response:

The applicant will address this comment during the site plan review.

LD107 Sheet LD107 was not provided in the revised DEIS material.

46. Provide note referencing the "Existing Vegetation Protection" detail on sheet CG502. *Applicant proposes to address this comment during site plan review.*
47. Provide tree species and caliper to each of the trees to be removed. *Applicant proposes to address this comment during site plan review.*
48. Add the following "Tree Protection Notes:"
 - a. Tree protection fencing to be installed along the proposed disturbance limit line and prior to any clearing or grubbing.
 - b. There shall be no storage of construction equipment or materials outside the clearing limit. No construction activity is permitted outside of the proposed clearing limits.
 - c. Fencing should remain in good condition for the duration of the construction period. Damaged fencing shall be repaired within one (1) day of occurrence.*Applicant proposes to address this comment during site plan review.*

Response:

46. Sheet LD107 has been revised to add the requested note; see revision dated May 17, 2010.
47. The applicant will address this comment during the site plan review.
48. The applicant will address this comment during the site plan review.

AS102

49. Although this plan shows a layout of buildings supposedly meeting the zoning height requirements, the feasibility of this layout is in question as no storm water facilities are proposed to mitigate for this increased impervious coverage. The West Office Building and K Residence are shown on AS102 in areas to be used for stormwater basins on the preferred site plan set. *Alternate locations for storm water facilities have been provided. Comment has been addressed by the applicant.*

Response:

The drawing was previously revised; see revision dated February 24, 2010.

ES101-ES105

50. Illumination for proposed parking and walkways should meet Illuminating Engineering Society of North America (IESNA) recommended levels. *As mentioned in our response for comment #53, a more specific photometric boundary (study area) for the areas of concern is needed to fully assess this concern. It was mentioned that additional lights would be need installed to meet*

IESNA requirements, in turn consuming more energy. We do not believe this statement can fully be determined without providing additional study areas.

51. Confirm that the proposed bollard light fixture has a covered/shielded top and not open to night sky. *The applicant has indicated that the bollard lights have a "Dome Top." We further request that the top be solid and not transparent. Comment can be addressed during site plan review.*
52. Pole mounted fixtures are proposed at a mounting height of 18 feet. Within a residential zoning district the maximum height allowable is 12 feet however schools, day care centers and churches are exempt. Planning Board to confirm the project is or is not exempt from this requirement. *The applicant has indicated the facility is an "Educational Center" with a primary site activity being an educational use, therefore allowing the exemption under a school designation. The Planning Board shall confirm the applicant's response.*
53. Point-by-point illumination levels extend well beyond the proposed lighting areas and read at a level of 0.00 foot candles. Provide the photometric boundary utilized for the "Foot candle Calculation Summary" on each sheet. *The applicant has indicated the photometric boundary on the plans. This area represents an illumination study of the project site. The "Footcandle Calculation Summary" should emphasize this but also indicate the illumination levels for the roadways, parking areas and sidewalks so that confirmation of illumination in these areas can be reviewed.*
54. Per the plan notes, lighting calculations only include the proposed lighting fixtures. In areas where proposed lighting is to be installed and existing lighting in the area will contribute to illumination levels, provide the levels of existing lighting as well. *Comment has been addressed by the applicant.*

Response:

50. The applicant acknowledges that the IESNA recommendations are an industry standard that apply to public areas and could also be used as a basis for design for this private property if desired by the Planning Board. Average illuminance levels for the existing and proposed lighting have been calculated and noted in Chapter 12. The site lighting design can be reevaluated during the site plan review. Chapter 12 has been revised.
51. The proposed bollard top is solid, not transparent. The applicant will address this comment during the site plan review.
52. Text was added to Chapter 12 in the DEIS as part of the March 10, 2010, response. The applicant looks forward to further comments from the Planning Board.
53. There are no public roadways on the project site, only driveways. The typical illuminance levels have been calculated and noted in the DEIS. Chapter 12 has been revised. The applicant will further address this comment during the site plan review.
54. The drawing was previously revised; see revision dated January 7, 2010.

Comments on the Stormwater Management:

55. Soil test locations have been shown on drawing C101, Site improvements have been shown on C102, and Soil types are noted on the pre and post drainage maps, drawings C1 and C2. In reviewing the soil test locations vs the proposed improvements vs the soil types, it is apparent additional testing is required. For example, in the vicinity of the proposed pervious parking near Existing Building C, The Patterson Inn, no soil testing has been done and the soil type (SbC) is noted to have moderate to slow permeability. Testing is required at all proposed areas of permeable pavement. *Applicant proposes to address this comment during site plan review.*

Response:

The acceptable permeability range listed in the NYSSDM is 0.5 and 3 inches per hour. The listed permeability within the USDA NRCS Soil Survey is 0.6-2.0 inches per hour in the surface layer/upper subsoil layer. Additional soil testing will be done in the site plan approval process to confirm rates.

56. Information of a number of soil test pits has not been provided (pits 2-14, 21, 26). Provide the test pit logs for these soil test pits. *Comment has been addressed by the applicant, however final stormwater designs and mitigation device locations may require additional soil testing.*

Response:

It was agreed that sufficient testing has been provided for the DEIS and the SWPPP.

57. Table 7-4 on page 27 of the Preliminary SWPPP shows an increase (typographical error?) in the proposed condition peak flow for the 100-year storm event for DP 1A. Table 7-4 page 7-12 in Chapter 7, Stormwater Management conflicts with the information in the Preliminary SWPPP. *Minor increases in peak flow are noted in revised Table 7-4 for design points 2 and 5 for all storm events studied. This does not meet the requirements of GP-0-10-001.*

Response:

The increases are generally less than 0.1 cfs and no more than 0.5 cfs at these two design points where LID design techniques such as permeable pavers are proposed. The gravel reservoir can be modified to provide additional storage of the larger storm events. The design can be finalized as we develop the plan further in the Site Plan Application process. Typically, NYSDEC and NYCDEP have accepted these practices and minor increases in flows. There is general agreement that the minor changes do not warrant creation of an additional disturbance for the minor flow change.

58. Reporting to the 11100 cfs is not realistic given the accuracy of the input data. Table 7-4 page 7-12 in Chapter 7, Stormwater Management is showing negligible increases in peak flow. The engineer may wish to round to the nearest cfs. However, this may require additional mitigation as at Design Point 5, the 25 year storm event pre development peak is 4.44 cfs, rounding to 4 cfs and the post development peak 4.82 cfs rounds to 5 cfs. *Minor increases in peak flow are noted in revised Table 7-4 for design points 2 and 5 for all storm events studied. This does not meet the requirements of GP-0-10-001.*

Response:

Please see response No. 57.

59. There does not seem to be a hydraulic summation of Design Points 1A, 1B and 1C and the upstream areas at the culvert under Route 22. This is a critical design point where the peak flows need to be studied. *Revised watershed maps were not submitted with this application. As such, we request this updated mapping prior to final resolution of this issue. We note that the peak flows for all design storms reported in table 7-4 show a reduction in peak flow to this design point.*

Response:

The maps will be revised in the FEIS to show the connection. However, please note that the schematic diagram, which was provided to the Town on March 10, 2010, shows the connections.

60. *The SWPPP needs to be prepared in accordance with GP-0-10-001, per the revised NYCDEP Final Regulations dated April 4, 2010, section 18-39.*

Response:

The SWPPP has been prepared in conformance with the General Permit as well as the NYCDEP revised WRR.

61. *The revised stormwater management report mentions Better Site Design Practices. Runoff Reduction in the Draft Stormwater Management Design manual should be addressed in the stormwater management report.*

Response:

When the draft chapters have been finalized and adopted, the applicant will revise the SWPPP accordingly. However, please note that the current design is conservative as the ponds have been sized to treat the two-year storm. As the design advances in the FEIS and Site Plan Application process, these ponds can be modified to treat the one-year storm volume calculated using the approved RRf and RRv.

Appendix G

62. Page 1-2, 1" line. The report is a Condensed Report Format as stated, however this format is only acceptable for small acreage projects, e.g., cell towers and well pads. The consultant should have used the standard format. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

63. The consultant did not develop an adequate site sensitivity model. The consultant correlated site sensitivity to prior disturbance, which is exactly what the SHPO says not to do. The discussion should be based on the site types likely to be identified that consider both ecological and cultural factors and their correlation to documented archaeological sites. Variables used to develop this model include: landform, soil type, depositional context, hydrology, geology, and floral and faunal communities. Values for these variables should be compared across the existing site record in order to formulate a sensitivity model that considers access to resources and transportation routes as well as the suitability of specific landforms for occupation. Based on the results of background research, the project area should be stratified into three probability rankings. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

64. Page 3-2, 5th paragraph. O'Conner's 1854 map of Putnam County is referenced, however it is not included in the report. *Comment has been addressed by the applicant.*

Response:

The DEIS was previously revised.

65. Figure 2. The consultant's definition of the APE is inadequate. Segments 2, 3, and 4 are isolated and the means to access those areas should be considered, as well as any infrastructure improvements that may be extended to those areas. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

66. The report recommends archaeological testing, but lacks specifics. *Comment has been addressed by the applicant.*

Response:

The DEIS was previously revised.

Chapter 12

67. See previous discussion regarding the APE. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

68. The methodology for the architectural survey is not clear. *Comment has been addressed by the applicant.*

Response:

The DEIS was previously revised.

69. Page 12-8, *Potential Architectural Resources*. It doesn't appear that an intensive evaluation of the structures was completed, therefore it is not possible to make determination of non-eligibility. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

70. See previous discussion regarding site sensitivity. The report refers to "potentially sensitive"; an adequate model should be developed to qualify sensitivity to low, medium, or high. *Comment has been addressed by the applicant.*

Response:

The DEIS was previously revised.

Geotechnical

71. We reviewed the report and support documentation prepared by CRA dated 5/23/08. It is preliminary and relates to the buildings and is comprehensive and applicable. The report does not specifically address site improvements as roadwork, cut and fill slopes and pavement subgrades, and stormwater management to include percolation characteristics. The contents of the report, however, would be very useful for the site improvement preliminary design process. *Comment noted by applicant, no response needed.*

Response:

No response needed.

Traffic Review

The following comments have been generated based on our review of the following documents:

Chapter 10: Traffic, Parking, and Public Transportation

Plan Sheets G-001, C-101, C-102, CS101, CS102, CS103, CS104, & CS105

Traffic Report

72. The traffic counts were conducted on Wednesday May 28th and Thursday May 29th 2008. For the year 2008, Memorial Day occurred on Monday May 26th. Generally, traffic conditions are less intense during holiday weeks due to commuters being absent from the roadway while on vacation. Therefore, the base conditions which were collected by the applicant may not represent the typical traffic conditions during non-holiday weeks. The applicant should provide evidence that the manual turning counts were not impacted by the holiday week, or the applicant should recount the study intersections during a nonholiday week and revise the traffic report accordingly. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

73. The applicant provides capacity analysis for the AM, PM, Later PM and Saturday Mid-Day peak hours. The applicant should provide data as to the typical operation of the facility on Sunday mornings. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

74. To establish the Background Growth portion of the No-Build traffic conditions, the applicant has increased the existing traffic volumes by an annual growth rate of 1.5%. The applicant should provide support for the use of a 1.5% annual growth rate. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

75. The applicant has generated or obtained the site generated trips for each of the development located adjacent to, or within the project study area, anticipated to be operational by the build year of 2014. The applicant should specify if the site generated trips for each development were generated as part of this report, or obtained from a traffic report previously conducted. For those site generated trips which were taken from an obtained traffic report, the applicant should include the volume figures from each referenced report within the appendix. Where the site generated trips have been generated by the applicant, a trip distribution figure should be prepared that depicts the distribution of each development. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

76. The applicant states that The Institute of Transportation Engineers (ITE) does not provide trip generation rates for the proposed improvements. If this were considered as one large development, this statement would be true; however, the applicant later states that only the residential portion of the development will create an increase in site generated trips. ITE does provide trip generation rates for residential uses. The applicant should utilize the trip generation rates contained within the

ITE Trip Generation Manual to determine the site generated trips due to the increase in residential units. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

77. The applicant has estimated the increase of site generated trips for the proposed facility by creating trip generation rates based on the manual turning counts conducted at the site driveway during the AM, PM, Late PM, and Saturday Mid-Day peak hours. The trips rates determined by the applicant utilize the number of residents as the independent variable to determine the peak hour trips associated with the increase in residential units. The applicant states the other site improvements (Audio-Video Addition, Maintenance Building, North Office Building and other smaller buildings) will not create an increase in the site generated trips. The applicant should provide substantial evidence to support the claim that the additions (other than the increase in residential units) will not create an increase in site generated trips. It would appear, based on the parking proposed underneath the "North Office Building" and "Maintenance Building," that the applicant anticipates some sort of parking demand for these buildings. Therefore, one could logically anticipate an increase of trips generated by the development due to the additional buildings, in addition to the increase from the residential units. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

78. The applicant states the trip distribution of the site generated trips was determined from "information obtained from the applicant on its residents' trip patterns." The applicant should submit this information for review, and explain the methodology for collecting such information. *Comment has been addressed by the applicant.*

Response:

The DEIS was previously revised.

Circulation

79. The applicant should elaborate as to the anticipated rate of bus arrivals, and the ability of the site to accommodate large numbers of busses arriving coincidentally. *Comment has been addressed by the applicant.*

Response:

The DEIS was previously revised.

80. The applicant shall submit turning templates to depict a bus successfully navigating the proposed bus parking area. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*

Response:

The applicant will address this comment during the site plan review.

81. The applicant should specify the anticipated design vehicle for the development, and provide vehicle turning diagrams depicting such vehicle navigating the site. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*

Response:

The applicant will address this comment during the site plan review.

82. The applicant shall provide data explaining how and where vehicles will turn around after utilizing the over flow parking area depicted on Sheet CS104. ***Applicant shall provide this information during the Site Plan approval review with the Planning Board.***

Response:

The applicant will address this comment during the site plan review.

83. The application shall submit a circulation plan for the underground parking areas. ***Applicant shall provide this information during the Site Plan approval review with the Planning Board.***

Response:

The applicant will address this comment during the site plan review.

Parking

84. The applicant shall submit calculations showing that the proposed parking supply shall meet the anticipated parking demand for the development. ***Applicant shall provide this information during the Site Plan approval review with the Planning Board.***

Response:

The applicant will address this comment during the site plan review.

Capacity Analysis Sheet

85. The applicant has utilized a 30% Right Turn on Red (RTOR) reduction for each signalized intersection within the study area, where such movement exists. The Highway Capacity Manual (HCM), which sets the standard methodology for such reductions, recommends that field counts be conducted to establish the number of right turns which occur during the red phase for each movement at each signalized intersection. Where no such data exists, HCM specifically states that no RTORs should be utilized. The use of a RTOR reduction will have a large impact on the results of the capacity analysis. Therefore, the applicant should provide counts which justify the use of 30% RTOR reduction for each right turn movement at each signalized intersection. ***Comment has been addressed by the applicant.***

Response:

The response was provided on March 10, 2010.

86. The applicant has analyzed the westbound approach for the signalized intersection of Route 22 & Route 68 as a two lane approach, with an 8.5' dedicated right turn lane, and an 8.5' shared left/thru lane. However, based on a review of the existing conditions, the approach is striped as one approach lane for all turning movements. The applicant should provide data to support the use of two lanes rather than one lane permitted all turning movements. ***An explanation as to why the two-lanes were used instead of one could not be found in the updated Traffic Section of the DEIS.***

Response:

The westbound approach for the signalized intersection of Route 22 and Route 68 is striped as a one-lane approach with a 17-foot width and a 3-foot wide shoulder as shown in the attached field inventory drawing. However, field observations (see Figures 1-3) revealed that the approach operates as a two-lane approach with right-turning vehicles utilizing both the travel lane and the shoulder to create a separate right turn lane during peak hours. This in turn creates two 10-foot lanes (one through/left turn lane and one right turn lane).

In addition, the maximum individual lane width that can be analyzed by HCS for signalized intersections is 16 feet; which in this case, if analyzed as a single lane, does not fully take into account the actual width of the roadway (17 feet). Therefore, to accurately model actual operating conditions (two-lane operation) and to account for the limits imposed by the maximum lane width input in HCS, a conservative lane grouping of two 8.5-foot lanes was utilized in the analysis.

87. The applicant should submit capacity analysis summary sheets that depict the Peak Hour Factor (PHF) utilized for the analysis of each signalized intersection. It is noted that the "Short Report" contained within the Highway Capacity Software Plus (The software utilized by the applicant for capacity analysis) provides such data, and could be included for each signalized intersection. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

Plan Review

88. Our general review of the site plan is that safe pedestrian circulation is lacking between the proposed parking bus area, and the main portion of the site. To address such, the applicant should revise or submit additional plans depicting the following per the Manual of Uniform Traffic Control Devices (MUTCD) and local requirements; crosswalks with appropriate signage, stop bars, sidewalks to/from the proposed overflow parking area, speed limit signs and stop signs. *Applicant shall provide this information during the Site Plan approval review with the Planning Board.*

Response:

The applicant will address this comment during the site plan review.

Review of Economic Analysis

89. The economic analysis prepared for the Watchtower Education Center (WEC) IS a thorough analysis that addresses the requirements of the DEIS scoping document. The analysis used the Regional Input-Output Modeling System (RIMS II) developed by the U.S. Department of Commerce to project regional economic impacts as well as a traditional analysis of tax payments to local jurisdictions in comparison to the services required from the Town, County and local school district. Of note is the fact that the WEC is exempt from federal, state and local taxes due to the applicant's status as a tax exempt organization. This is especially significant given the assessed value of Watchtower holdings was \$177,181,900 in 2008. *Comment has been addressed by the applicant.*

Response:

The DEIS was previously revised.

90. Despite the tax exempt status Watchtower does voluntarily pay taxes on the Patterson Inn which provides lodging for visitors and guests. The Patterson Inn had an assessed value of \$14,850,300 in 2008 (approximately 8% of total Watchtower holdings) and \$344,563 of tax payments were made to the various taxing jurisdictions (see table following). Another Watchtower holding, Valley Farms Corporation, also voluntarily pays taxes but those tax payments only amounted to a combined total of \$414.93 for all taxing jurisdictions in 2008.

Patterson Inn — 2008 Tax Payments

Taxing Jurisdiction	Taxes Paid
Putnam County	\$ 30,413
Town of Patterson	\$ 46,429
Patterson Library	\$ 4,180
Patterson Fire District No.1	\$ 10,942
Park District	\$ 1,301
Carmel Central School District	\$251,298
Total	\$344,563
Sources: Applicant's Economic Analysis and Town of Patterson Tax Receiver's Office, 2008 County and Town Tax Bill, and 2008-2009 Carmel Central School District Tax Bill.	

Comment has been addressed by the applicant.

Response:

The response was provided on March 10, 2010.

91. Although Watchtower contributed only a modest sum in tax payments given the size and assessed value of the holdings, this is tempered by the fact that very little is required in the way of services from the Town of Patterson, Putnam County and Carmel Central School District. WEC properties are provided with 24 hour private security. An on-site infirmary with two full-time physicians and 16 registered nurses and on-site ambulance is provided and there are 14 emergency medical technicians (EMT's) on site. Recreational facilities are provided on site as are library facilities. There are no school-aged children residing at the WEC so there is no demand on the Carmel Central School District. Refuse is handled by a private contractor under contract to WEC. The only demands placed on local services are limited to medical services for WEC residents with more serious medical conditions who must be treated at area hospitals, and fire protection and police protection services. Fire protection services are provided by the Patterson Fire District and police protection is provided by the County Sheriff and New York State Police. *Comment has been addressed by the applicant.*

Response:

This comment was noted.

92. The economic analysis includes the secondary or induced impacts flowing from the construction of the WEC project. This analysis is performed using the RIMS II regional input-output model. A primary input to the model is the number of construction jobs and the salaries associated with those jobs. It is projected that 166 new construction jobs would be created during the four year construction period (664 person years for the combined four years). This total number is apparently used as input to the model. However, it is stated in the economic analysis that it is anticipated the 75 percent of the construction labor demand would be met through volunteers. If this is the case then the regional economic impact is overstated since the volunteers would not be drawing the additional or new salary that was input to the model. *Comment has been addressed by the applicant.*

Response:

The response was provided on March 10, 2010.

Well Pump Test Data – Comments #22-#27 from Mr. Rich Williams, Town Planner

The Pumping Test Report dated December 2009 prepared by C.A. Rich Consultants included in Appendix C7 describing the installation and testing of two additional Sand and Gravel wells on the property was reviewed and appears to be a comprehensive and accurate evaluation of potential impacts to the local groundwater system and surrounding groundwater users if these wells are utilized in the future.

Response:

This comment is noted.



RESTAURANT
DELI

40'

CP 68

Figure 1

SR22



40'

S22

S22

Figure 2



401

CR
65

Figure 3

SR22



March 10, 2010

Town of Patterson
Planning Board
P.O. Box 470
Patterson, New York 12563

Attn: Richard Williams Sr., Town Planner

Re: Watchtower Educational Center Application

Dear Mr. Williams:

We have revised the preliminary Draft Environmental Impact Statement (pDEIS) based on the comments from you and from the Town Engineer, Andrew Fetherston. After considering your assessment of these documents, we are pleased to provide responses to the comments as outlined in the attached document. Relevant documentation, which has been revised, is also included on the enclosed compact disc. The changes in the documents have been flagged for your attention.

Additionally, we have included other edits that were not specifically noted in the comments from the Town Planner and Engineer. These edits are listed according to the pDEIS chapter references:

- The pDEIS has been divided into two binders due to the increase in page count.
- Chapters 1, 2, and 16: The new fence and gate were added to the list of additional features.
- Chapters 1 and 16: The title of the "Reduced Height Alternative Site Plan Layout" was changed to the "As-of-Right Alternative," as this alternative demonstrates the proposed project developed under existing zoning regulations as-of-right.
- Chapters 3 and 4: The existing height reference was changed to 75 feet for the Auditorium.
- Chapter 3, page 8: The existing building coverage was reduced. While reanalyzing the building coverage in response to the comments received, we noted that the tennis and basketball courts had been erroneously included in the existing building coverage.

- Chapter 7: The sheet reference was corrected.
- Chapter 12, figure 12-20: The photosimulation was revised based on your verbal comments from the meeting on September 29, 2009. We were asked to check the scale. The figure has been slightly revised as a result.
- Chapter 12 and Appendix G: The listing of areas of archaeological sensitivity were clarified.

We understand that after you review the files, you will inform us if you feel that the comments from you and the Town Engineer have been adequately addressed for completeness. We will then need to transmit to the Town Planning Board a copy of the revised pDEIS without the underscoring of changes shown. We appreciate your consideration of this information, and if you have any further questions, we would be glad to respond. Please feel free to contact Joel Heier at (845) 306-1000.

Sincerely,

A handwritten signature in black ink, appearing to read "Enrique Ford". The signature is written in a cursive, flowing style.

Enrique Ford, AIA, R.A.
Design/Build Department

Enclosures

c: Richard Eldred, P.E, P.L.S.
Joel Heier

**RESPONSES TO COMMENTS OF
TOWN PLANNER and TOWN ENGINEER**

March 10, 2010

COMMENTS FROM TOWN PLANNER ON DEIS:

1. Preceding the Executive Summary should be a list of all the consultants that contributed to preparation of the DEIS, or supporting studies. The list should include names, addresses, FAX numbers and project responsibilities.

Response:

A new cover sheet is attached.

2. Chapter I.A "Project Description" (Page 1-2) the number of new residential units in "G Residence" and "H Residence" should be provided, along with the number of 1-bedroom units, 2- bedroom units, etc.

Response:

The DEIS has been revised to provide the information requested.

3. Chapter I.B "Construction" (page 1-8) notes that "up to 10 acres may be disturbed at one time...", The DEIS should discuss the requirements pursuant to the General Permit for exceeding the 5 acre limit (Part II.C.3).

Response:

The DEIS has been revised to provide the information requested.

4. Chapter I.B "Effects on the Use and Conservation of Energy Resources" (page 1-11) A discussion of the proposed upgrades to the NYSEG Haviland Hollow substation should be discussed.

Response:

The DEIS has been revised to provide the information requested. Please note the change in position from NYSEG compared to their response in 2007. Please see also the change in Chapters 6 and 19.

5. Table 1-1 The height variance for the fence should be added.

Response:

The DEIS has been revised to provide the information requested.

6. Table 1-1 a wetland/watercourse permit must be approved by the Patterson Planning Board for the encroachments within 100' of a watercourse.

Response:

The DEIS has been revised to provide the information requested.

7. Table 1-1 pursuant to §154-71 and their authority for approval of a site plan, the Planning Board must grant a waiver for the reduced parking dimensions.

Response:

The DEIS has been revised to provide the information requested.

8. Table 1-1 Patterson's Code requires that all driveways and parking areas must have an asphalt or concrete surface unless a waiver is granted from the Planning Board.

Response:

The DEIS has been revised to provide the information requested.

9. Chapter 2.A "Introduction" (Page 2-1, last paragraph) a variance for parking dimensions from the ZBA is not required. A waiver of the standards from the Planning Board will be required.

Response:

The DEIS has been revised to provide the information requested.

10. Chapter 2.B "Project Location and Site Definition" (Page 2-2) The project proposes 421 new parking spaces. The justification for the number of parking spaces should be provided, taking into consideration that there will be 500 new residents.

Response:

The DEIS has been revised to provide the information requested.

11. Chapter 3.B "Land Use" (Page 3-2) Hamlets are typically small areas of mixed residential and commercial use. There are several small commercial enterprises at, and around the intersection of Haviland Hollow Road and NYS Route 22. However, there is not associated with this intersection a residential component which would allow this area to be classified as a hamlet.

Response:

The DEIS has been revised to provide the information requested.

12. Figure 3-1 "Existing Land Use". It was noted there are several inconsistencies with the map presented. A few examples are:

- Tax Map No. 14.-1-2 should be shown as Open Space Recreation Area.
- Tax Map No. 13.-3-37 is owned by the Town of Patterson and is a former landfill. This should be shown as Institutional.
- Tax Map No. 35.-5-37 is vacant land, not agricultural
- Tax Map No. 36.-3-10 and Tax Map No. 24.-2-55.3 are both agricultural.
- Tax Map No. 14.-1-30 and 14.-1-31 are commercial, not transportation.
- Tax Map No. 24.-1-26 is institutional or commercial, not vacant land.

Response:

Figure 3.1 has been revised to provide the information requested.

13. Chapter 3.B "Existing Conditions, Surrounding, Adjacent and On-site Land Uses" (Page 33, 2nd paragraph) "Beach Hollow Center" should be "Birch Hollow Center". In addition, there is a party catering business that maintains a warehouse at the site. It is not a "party store".

Response:

The DEIS has been revised to provide the information requested.

14. Chapter 3.C "The future without the proposed project" (page 3-6) The last paragraph provides that the Town Zoning Code was recently amended on March 31, 2007. There have been a number of changes to the zoning code since that date. The most recent change was adopted by the Town Board on July 22, 2009.

Response:

The DEIS has been revised to provide the information requested.

15. Chapter 3.D "Probable Impacts of the Proposed Project, Zoning" (Page 3-7) a variance for parking dimensions from the ZBA is not required. A waiver of the standards from the Planning Board will be required.

Response:

The DEIS has been revised to provide the information requested.

16. Chapter 3.D "Probable Impacts of the Proposed Project, Zoning" (Page 3-7) A brief discussion of the height variances that are needed is provided in this section, but no discussion is provided concerning the "probable impacts". Also no justification is provided within this section to demonstrate a need for the area variances for height.

Response:

The DEIS has been revised to provide the information requested and examine probable impacts to zoning.

17. Chapter 3. The height variance for the fence is not discussed.

Response:

The DEIS has been revised to provide the information requested.

18. Chapter 3. (Page 3-8) Patterson's Zoning Code permits a building coverage of 15% for educational centers. The DEIS provides a table showing the existing and proposed building coverage. This section should also include a discussion of the original height variance, which was proposed to "reduce the footprint". This discussion should include the building coverage that would have occurred had the variance not been granted. In addition, this section should provide the building coverage that would occur if the presently requested variance for height is not granted.

Response:

The DEIS has been revised to provide the information requested. Please see also the change in Chapter 16.

19. Chapter 4.B "Existing Conditions, Putnam County Sheriffs Office" (Page 4-2) the number of E-911 calls that have been made from WEC should be provided.

Response:

The DEIS has been revised to provide the information requested. Please see also the change in Chapter 13.

20. Table 5-2 shows the area of disturbance as 57.1 acres. Chapter 1.B "Natural Resources" (Page 1-5) states that total site disturbance will be 49.1 acres. (Also "Construction" pg 1-8). If the difference between the area of disturbance shown on Table 5-2, and the area of disturbance provided in Chapter 1 are areas of overlap between the phases, this should be noted.

Response:

The difference in area is noted in the paragraph prior to Table 5-2. It states, "Some of the boundaries for the phases overlap and therefore the sum of the areas of disturbance for the individual phases is greater than the total actual area of disturbance for the project which is 49.1 acres."

21. Chapter 5.C "Surface Soils, Stormwater Pollution Prevention Plan" (Page 5-14). It should be noted that the Town of Patterson is a "regulated, traditional land use control MS4" and as such the SWPPP will be reviewed by the Town and a MS4 SWPPP Acceptance form issued. The Acceptance form must be submitted with the NOI (Part II.A.2).

Response:

The DEIS has been revised to provide the information requested.

22. Chapter 6.B "Existing Conditions" (Page 6-2) the results of the well tests should be included in the DEIS.

Response:

The DEIS has been revised to provide the information requested. See Appendix C.7, "Pumping Test Report," December 2009, by CA Rich Consultants detailing the results of the development of the two additional wells and the 72-hour testing of the seven-well system conducted in October 2009.

23. Chapter 6.D "Potable Water Supply" (Page 6-8) the discussion of water usage should focus on the peak water and wastewater demand, and not the average.

Response:

The DEIS has been revised to provide the information requested.

24. Chapter 6.D "Aquifer Recharge" Clearly there is adequate recharge from the WEC site for the surrounding region. However, groundwater flow in the area of WEC is generally towards the south, southwest, away from the wells. The DEIS should discuss the recharge to the sand and gravel wells from the area which contributes to their recharge.

Response:

The aquifer recharge study in Appendix C.4, "Hydrogeologic Analysis," Watchtower Educational Center, Town of Patterson, NY, December 2009, is now included in the DEIS. This information replaces the preliminary calculations and narrative that had been included in the previous version of the DEIS. The report examines the different recharge figures for the different portions of the site.

25. Chapter 6.D "Wastewater" (Page 6-10, footnote) the average annual rainfall appears to be overestimated. Other sources such as the Soil Survey of Putnam and Westchester County, or NYS Guidelines for Urban Erosion and Sediment Control place the average annual rainfall at 44 to 45 inches.

Response:

See Appendix C.4, "Hydrogeologic Analysis," Watchtower Educational Center, Town of Patterson, NY, December 2009, noted above. Section 4.1, "Water Resources" identifies the Watchtower sub-watershed calculation area to be 4.55-square miles. The hydrologic budget is based upon an annual precipitation rate of approximately 51 inches over a period of 30 years as measured by the National Oceanic and Atmospheric Administration (NOAA) at its climatologic measurement station in Yorktown Heights, New York."

- 26. Chapter 6.D "Wastewater" (Page 6-10, footnote) The amount of recharge appears to be overestimated. The majority of the site appears to be glacial till comprised of loam, silty loam soils. Wolcott & Snow (1995) found an annual recharge of 8.45" on till or silty/clay soils. Gerber (1982) found recharge rates on silty/clay soils or till deposits of 2.3" to 6.8". It appears that the recharge analysis has used an estimated annual recharge of 12". Justification for the use of 12" of annual recharge should be provided.

Response:

See Appendix C.4, "Hydrogeologic Analysis," Watchtower Educational Center, Town of Patterson, NY, December 2009. For a more detailed discussion, see Section 4.1 on page 11 of the derivation of the groundwater recharge value. Existing studies indicate that recharge within areas similar to the Watchtower subwatershed area [WSA] may range from 7 inches up to as much as 21 inches annually (Chazen 2004, Rich & Malansky 1984). CA Rich Consultants conservatively used a recharge value within the WSA of 8 inches based upon relatively steep slopes and relatively thin overburden in eastern upland areas of the subwatershed as well as relative thickness of the unconsolidated sediments and small topographic relief in the western river valley.

- 27. Chapter 7.C "Hydrology Model" Table 7-1 provides the rainfall values used in the model. These values do not reflect the most current rainfall values for the region which can be obtained from the Northeast Regional Climate Data Center (See NYS SMDM, Chapter 10, page 10-11).

RAINFALL VALUES ¹	
Return Period	Rainfall Value (inches)
1yr-24hr	3.1
2yr-24hr	3.5
10yr-24hr	5.5
25yr-24hr	6.0
100 yr-24 hr	9.5
¹ Source: northeast Regional Climate Center	

Response:

The DEIS has been revised to provide the information requested.

- 28. Chapter 7.D "Pre-Development Conditions" (Page 7-4) The discussion of Mountain Brook should include that the stream, as it crosses the WEC site is a 2nd Order stream with its source originating both on WEC's site and also on the State lands to the east.

Response:

The DEIS has been revised to provide the information requested.

29. Chapter 7.F "Post-construction Stormwater Management Practices" (Page 7-8) The section should include an evaluation of Better Site Design practices as required by Chapter 10 and the General Permit.

Response:

The DEIS has been revised to provide the information requested. We have incorporated discussion of at least 7 of the 15 BSD practices that were implemented in the design of the stormwater management system.

30. Chapter 7.F "Additional Stormwater Management Design Features" (Page 7-10) discusses the use of flow-impact development practices throughout the site "where feasible". Additional discussion should be included about the LID/BSD/distributed controls that will be used, or those that were considered and rejected. The discussion should include an evaluation of the percentage of impervious area, by each hydrologic soil, group to be directed to a LID/BSD or standard infiltration practice.

Response:

A discussion on each of the BSD practices that have been implemented in the design approach to the site layout, grading and stormwater management system design has been provided in both Chapter 7 and in the SPPP Appendix. However, the NYSDEC is in the process of revising several of the NYSSMDM chapters, including Chapter 10. This makes it difficult to quantify the BSD goals when they appear to be changing. Once the chapters have gone through public comment, we will update the chapter to reflect the approved NYSDEC and NYCDEP requirements.

31. Page 7-11, 2nd paragraph last, sentence "Because there is no net increase in ..."

Response:

The DEIS has been revised to provide the information requested.

32. Chapter 7.F "Pollutant Loading Analysis" (Page 7-13) The pollutant loading rates used in the analysis of Design Point 1 were based on the wet pond design, Design 6 in "Reducing the Impacts of Stormwater Runoff from New Development". The DEIS notes that the design requirements for this pond require that the permanent pool equal four times the runoff volume of 0.5inches. What has been omitted is to reach the higher pollutant removal achieved by Design 6 requires a permanent pool with a residence time of 2 weeks. The DEIS should confirm that a two week residence time will exist in order to take credit for the removal rates suggested.

Response:

The requirement is to design the pond so that the permanent pool is equal to four times the volume of runoff from the mean storm OR provided a permanent pool residence time of two weeks. This design requirement came from 'Controlling Urban Runoff: A Practical Manual for Planning and Designing Urban BMPs' prepared by Metropolitan Washington Council of Governments Water Resources Planning Board.

33. Chapter 7.F "Project Phasing" (Page 7-16) The DEIS should discuss the NYS DEC requirements for exceeding 10 acres of disturbance.

Response:

The DEIS has been revised to discuss the five-acre waiver and the NYSDEC requirements for inspections and stabilization for exceeding the five acres of disturbance.

34. Chapter 8.B "Wetlands" and "Streams" (Page 8-2) The DEIS twice references Patterson's wetland code as §158-18. The correct reference is §154-18.

Response:

The DEIS has been revised to provide the information requested.

35. Chapter 8.C "Wetland Delineation" (Page 8-6) The DEIS discusses that two locations are under consideration where excess soil will be deposited. The DEIS also states that after one of the two locations is chosen by the lead agency (or Town?), the chosen site would be examined ... to determine the presence or absence of regulated wetlands. Since the presence of any wetland would be a factor to be considered in the appropriateness of the use of either location for placement of excess soil, this evaluation should be made now, and included in the DEIS.

Response:

The applicant met with the Town's wetland consultant Ted Kozlowski at the project site on 12.4.09. Mr. Kozlowski determined that one of the two alternative locations for excess soil deposition is directly adjacent to a Town-regulated wetland. Mr. Kozlowski recommends that this wetland be delineated in the Spring of 2010. The DEIS has been revised to provide this information.

36. Chapter 9.D "Probable Impacts of Proposed Project" (Page 9-17) The DEIS notes that the site chosen for placing the excess soil will be evaluated for rare or endangered species once the site is chosen. Since the presence of rare or endangered species would be a factor to be considered in the appropriateness of the use of either location for placement of excess soil, this evaluation should be made now, and included in the DEIS.

Response:

Both areas of excess soil deposition have been examined for the presence of NYS-listed plant species and communication with the NYNHP has identified two species of animals that are known for this region of the Town of Patterson, neither of which would utilize the proposed areas of excess soil deposition due to lack of appropriate habitat. The DEIS has been revised to provide the information requested.

37. Chapter 10.A "Principal Conclusions" states that there will be no significant traffic impacts from the proposed project. The DEIS should either provide the underlying basis for this conclusion, or acknowledge the conclusion as the Applicant's opinion.

Response:

The DEIS on page 10-15 has been revised to provide the information requested.

38. Chapter 10.A "Principal Conclusions" Any traffic analysis should be conducted at a sufficient level to determine the level of impacts and mitigation required. This includes any evaluation of whether signalization of WEC driveway intersections with NYS Route 22 is required.

Response:

The DEIS has been revised to provide the information requested.

39. Chapter 10.D "The Future without the Proposed Project" (Page 10-8) under Other Development Projects the Burdick Farms Subdivision had received conditional approval. The conditions of the approval were not met within the allotted times and the approval has expired. The original Applicant has chosen not to proceed with the subdivision and has sold the property.

Response:

The DEIS on page 10-8 has been revised to provide the information requested.

40. Chapter 10, Table 10-5, See above concerning Burdick Farms.

Response:

The DEIS has been revised to provide the information requested.

41. Chapter 13.C Table 13-5 See above concerning Burdick Farms. Also, 17 Couch Road Subdivision has received conditional final approval and Tractor Supply plans to open in November of 2009.

Response:

The DEIS has been revised to provide the information requested.

42. Chapter 13.D "Summary of Construction Impacts" (Page 13-12) states "To the extent that local services in the Town of Patterson would be affected, actions would be taken to minimize the impact". Any mitigation must be discussed in the DEIS.

Response:

No negative impacts are anticipated; and therefore, no mitigation is required. The DEIS has been revised to reflect this.

43. Chapter 14.B "Schedule and Construction Stages and Phasing" (Page 14-3) states, "A waiver would be sought from the NYS DEC for the phase areas larger than 5 acres". This section should discuss the waiver requirements under the general permit (GP-0-08-001Part II.C.3) and acknowledge that the waiver, pursuant to the General Permit, comes from the Town of Patterson as a regulated MS4.

Response:

The DEIS has been revised to provide the information requested.

44. Chapter 16 "Alternative Site Plan Layout" SEQRA requires that "[t]he description and evaluation of each alternative should be at a level of detail sufficient to permit a comparative assessment of the alternatives discussed"[617.9(b)(5)(v)]. Discussion of alternatives presented do not meet this requirement. For example, under "Geography, soils and Topography" the DEIS acknowledges that this alternative will result in "substantially more blasting, grading and excavation, and disturbance of steep slopes" but does not quantify the amount of increase.

Response:

The DEIS has been revised to provide the information requested.

45. Chapter 16 "Reduced Project Size Alternative" no discussion on a reduced project size has been presented, and therefore no comparative assessment can be made of this alternative.

Response:

The DEIS has been revised to provide the information requested.

COMMENTS FROM TOWN ENGINEER ON AMENDED SITE PLAN:

Sheet CE101:

1. A level spreader near the temporary construction trailers appears to be proposed to discharge onto a paved area.
2. Temporary Sediment Basin SB-01 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed.
3. Show the actual dimension of Sediment Trap ST-01.

Response:

1. The drawings have been revised to provide the information requested.
2. Additional information will be provided in a later stage of the approval process.
3. Additional information will be provided in a later stage of the approval process.

Sheet CE104

4. Temporary Sediment Basin SB-02 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed.

Response:

Additional information will be provided in a later stage of the approval process.

Sheet CE106

5. Temporary Sediment Basin SB-03 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed.

Response:

Additional information will be provided in a later stage of the approval process.

6. The Alternate Excess Soil Area (North Pasture) is channelizing runoff by proposing silt perpendicular to the contours on the east side of the stockpile. Methods for slowing and controlling this concentrated flow should be proposed.

Response:

The drawings have been revised to provide the information requested.

Sheet CE107

7. The Existing Excess Soil Area is allowing runoff to discharge from the east and west sides of the stockpile. Additional silt fence and/or other methods for slowing and controlling this runoff from the stockpile should be proposed.

Response:

The drawings have been revised to provide the information requested.

Sheet CG101

8. Drainage on the uphill (East) side of the Audio-Video Building Addition proposes to pipe storm drainage under the proposed building. While this is strongly discouraged and alternate routes should be investigated, details of this proposal are required.
9. Show on the plans where roadway access is taken to the 15' wide maintenance road for Stormwater Pond #1.

Response:

8. The drawings have been revised to provide the information requested.
9. Additional information will be provided in a later stage of the approval process.

Sheet CG102

10. Identify the seven (7) symbols in the Bus Parking Area island and the five (5) symbols in the porous pavement.
11. Label the proposed contours in the Bus and Visitors Parking Lots.

Response:

10. The drawings have been revised to provide the information requested.
11. The drawings have been revised to provide the information requested.

Sheet CG104

12. Outlet protection is required on the storm drain discharging from Storm water Pond #2.
13. Unpaved roads are not shown southeast of the Recycling Building, but the grading for the roads are. Show the unpaved roads on this drawing.

Response:

12. The drawings have been revised to provide the information requested.
13. The drawings have been revised to provide the information requested.

Sheet CG501

14. On Detail 3, Temporary Sediment Basin, provide dimensions or a table of dimensions where a question mark (?) is presently shown.
15. On Detail 3, Temporary Sediment Basin, provide stabilized outlet dimensions, which are not presently shown on the plans as stated on the detail.
16. Detail 4, Earth Dike identify each dike on the plans as A-I, B-5 etc. Clarify if a perimeter dike or earth dike is proposed based on constraints like contributing drainage area, etc. An earth dike may be required over a perimeter dike north of the Audio-Video Building Addition.

Response:

14. The drawings have been revised to provide the information requested.
15. Additional information will be provided in a later stage of the approval process.
16. Additional information will be provided in a later stage of the approval process.

Sheet CG503

17. Specify the filter fabric on the perforated riser proposed on Detail 1 - Pipe Outlet Sediment Trap.

Response:

Additional information will be provided in a later stage of the approval process.

Sheet CSI01

18. I request the Building Inspector review the twenty (20) foot road width proposed on the west side of the proposed North Office Building and surrounding the proposed G and H residences. I believe the NYS building code requires a 26 foot wide road due to the height of the proposed building.

Response:

This question was reviewed with the Director of Code Enforcement, Nicholas Lamberti. His response is attached for your reference and will be added to the DEIS Appendix.

CS103

19. A waiver is required for the undersized parking spaces proposed near the Patterson Inn. CS104 and CS105

20. Dimension the overflow parking (diagonal).

Response:

19. We agree and have already noted this need in the DEIS, Chapter 1.

20. The drawings have been revised to provide the information requested.

CU101

21. The water and storm sewer does not appear to have 10 feet of horizontal separation. Clarify how the potable water system is being protected.

Response:

The drawings have been revised to provide the information requested.

LD101

22. General note #2, Provide a planting schedule (i.e., species, names, quantity, installation size, spacing, etc.) and planting design for the proposed rooftop plantings.

23. General note #3, detail the proposed seed mixture for the mowable strip along the roadway (Typical for each landscape plan in the set).

24. General note #4, provide the desired species or specify the supplier for the native wildflower mixture (Typical for each landscape plan in the set).

25. Relocate the Norway Spruce proposed to be planted with in the stormwater basin #1 maintenance road.

26. Proposed plantings are to be installed on top of underground utilities in numerous locations. Revise planting layout as necessary (Typical for each landscape plan in the set).

27. Provide a planting scheme and schedule for the proposed areas labeled "Various Shrubs to be Determined Later" (Typical for each landscape plan in the set).

28. The individual tree symbols for the plant material is easy to read however there is no schedule which quantifies the proposed plantings. Provide in a plant schedule; include botanical/common names, quantity, installation size, root condition, etc. (Typical for each landscape plan in the set).

29. Plant symbol for the White, Black & Colorado Spruce use the same tree symbol. Provide labels to differentiate.

30. Identify the existing tree symbols to the legend (Typical for each landscape plan in the set).

31. Clarify planting hatches which are not listed in the legend (Typical for each landscape plan in the set).

32. This plan is proposing plantings on the maintenance road. Confirm that this will be a suitable, drivable surface.
33. Confirm that the plantings proposed for the stormwater basin berm are mowable lawns, where visible signs of seepage and other sources of failure would be detectable.
34. It appears ½ the road by the North Office Building is proposed to be planted. Please clarify the surface treatment in this area.

Response:

22. Additional information will be provided in a later stage of the approval process.
23. Additional information will be provided in a later stage of the approval process.
24. Additional information will be provided in a later stage of the approval process.
25. The drawings have been revised to provide the information requested.
26. The drawings have been revised to provide the information requested.
27. Additional information will be provided in a later stage of the approval process.
28. Additional information will be provided in a later stage of the approval process.
29. The drawings have been revised to provide the information requested.
30. Additional information will be provided in a later stage of the approval process.
31. The drawings have been revised to provide the information requested.
32. Additional information will be provided in a later stage of the approval process.
33. Additional information will be provided in a later stage of the approval process.
34. The drawings have been revised to provide the information requested.

LD102

35. General note #2, does not provide a planting scheme or schedule for the proposed plant material to be installed for the converted woods areas.
36. Additional spacing for growth should be provided for the proposed Thundercloud Plum plantings at the access drive to the bus/visitor parking area.

Response:

35. Additional information will be provided in a later stage of the approval process.
36. Additional information will be provided in a later stage of the approval process.

LD103

37. Refer to the comments above for LD101 & LD102 regarding additional information on plant material.

Response:

- Additional information will be provided in a later stage of the approval process.

LD104

38. Existing and proposed tree symbols are depicted in a similar boldness. Clarify the difference.
39. An alternate plant selection, preferably native, should be provided for the Crimson King Norway Maple which is considered an invasive species.
40. A partly graded serpentine road is shown west of the road adjacent to storm water basin #2. The purpose of this road needs to be clarified.
41. Similar to stormwater basin # 1, this plan is proposing plantings on the maintenance road. Confirm that this will be a suitable, drivable surface.

Response:

38. The drawings have been revised to provide the information requested.
39. The drawings have been revised to provide the information requested.
40. The drawings have been revised to provide the information requested.
41. Additional information will be provided in a later stage of the approval process.

LDI05

42. Provide construction details for the proposed gates and fencing at the site entrance on Route 22.
43. Adjust location of the proposed Norway Spruce at intersection to improve site distance.
44. Additional spacing for growth should be provided for the proposed Thundercloud Plum plantings at the access drive to the bus/visitor parking area.

Response:

42. Additional information will be provided in a later stage of the approval process.
43. Additional information will be provided in a later stage of the approval process.
44. Additional information will be provided in a later stage of the approval process.

LDI06

45. General note #3, detail the proposed pasture seed mixture.

Response:

Additional information will be provided in a later stage of the approval process.

LDI07

46. Provide note referencing the "Existing Vegetation Protection" detail on sheet CG502.
47. Provide tree species and caliper to each of the trees to be removed.
48. Add the following "Tree Protection Notes:"
 - a. Tree protection fencing to be installed along the proposed disturbance limit line and prior to any clearing or grubbing.
 - b. There shall be no storage of construction equipment or materials outside the clearing limit. No construction activity is permitted outside of the proposed clearing limits.
 - c. Fencing should remain in good condition for the duration of the construction period. Damaged fencing shall be repaired within one (1) day of occurrence.

Response:

46. Additional information will be provided in a later stage of the approval process.
47. Additional information will be provided in a later stage of the approval process.
48. Additional information will be provided in a later stage of the approval process.

ASI02

49. Although this plan shows a layout of buildings supposedly meeting the zoning height requirements, the feasibility of this layout is in question as no storm water facilities are proposed to mitigate for this increased impervious coverage. The West Office Building and K Residence are shown on ASI02 in areas to be used for stormwater basins on the preferred site plan set.

Response:

The drawings have been revised to provide the information requested.

ES101-ES105

50. Illumination for proposed parking and walkways should meet Illuminating Engineering Society of North America (IESNA) recommended levels.
51. Confirm that the proposed bollard light fixture has a covered/shielded top and not open to night sky.
52. Pole mounted fixtures are proposed at a mounting height of 18 feet. Within a residential zoning district the maximum height allowable is 12 feet however schools, day care centers and churches are exempt. Planning Board to confirm the project is or is not exempt from this requirement.
53. Point-by-point illumination levels extend well beyond the proposed lighting areas and read at a level of 0.00 foot candles. Provide the photometric boundary utilized for the "Foot candle Calculation Summary" on each sheet.
54. Per the plan notes, lighting calculations only include the proposed lighting fixtures. In areas where proposed lighting is to be installed and existing lighting in the area will contribute to illumination levels, provide the levels of existing lighting as well.

Response:

50. The current *IESNA Lighting Handbook*, 9th Edition, 2000, recommends an average maintained illuminance level for sidewalks in residential areas of 0.2 footcandles (fc), 0.5 fc for walkways distant from roadways, and 0.2 fc for the maintained illuminance value for parking lots. A maximum-to-minimum uniformity ratio of 20:1 is also recommended. As shown on the ES101-ES105 drawings, there are areas in the existing and proposed work which provide lower lighting levels than these recommended values. However, our 17 years of operational experience with the site has shown that the existing light levels have been adequate for safety. The proposed new site lighting was designed to harmonize with and maintain the existing lighting levels on site. We feel that the light levels recommended by IESNA are more than what is necessary for this property, which is predominantly private. We are, therefore, reluctant to add the many pole light fixtures and bollards that would be required to meet these recommended light levels. Those additional fixtures would increase the visibility of the campus to the neighbors and use more energy. As a side point, regarding other IESNA recommendations, the Energy Code of New York State refers to ASHRAE/IESNA 90.1-2001. In section 9.2.6, it states that exterior luminaries greater than 100 W, need a minimum efficacy of 60 lm/W. Our proposed pole fixture is 107 lm/W and therefore exceeds this minimum energy efficiency requirement.
51. The drawings have been revised to provide the information requested.
52. Chapter 12 in the DEIS has been revised to provide the information requested.
53. A line has been added to graphically show the limits of the photometric boundary used for the calculation. The lighting levels shown demonstrate that there will be no change to lighting levels at the property lines.
54. The drawings have been revised to provide the information requested.

Comments on the Stormwater Management:

55. Soil test locations have been shown on drawing CIOI, Site improvements have been shown on C102, and Soil types are noted on the pre and post drainage maps, drawings C1 and C2. In reviewing the soil test locations vs the proposed improvements vs the soil types, it is apparent additional testing is required. For example, in the vicinity of the proposed pervious parking near Existing Building C, The Patterson Inn, no soil testing has been done and the soil type (SbC) is noted to have moderate to slow permeability. Testing is required at all proposed areas of permeable pavement.

Response:

Additional information will be provided in a later stage of the approval process.

56. Information of a number of soil test pits has not been provided (pits 2-14, 21, 26). Provide the test pit logs for these soil test pits.

Response:

The test pit numbers that do not have test pit logs were tentative test pit locations and were not completed. A preliminary plan for test pit locations had been created. However, based on the actual field conditions, the number of test pits completed was reduced.

57. Table 7-4 on page 27 of the Preliminary SWPPP shows an increase (typographical error?) in the proposed condition peak flow for the 100-year storm event for DP 1A. Table 7-4 page 7-12 in Chapter 7, Stormwater Management conflicts with the information in the Preliminary SWPPP.

Response:

The DEIS has been revised to provide the information requested.

58. Reporting to the 1/100 cfs is not realistic given the accuracy of the input data. Table 7-4 page 7-12 in Chapter 7, Stormwater Management is showing negligible increases in peak flow. The engineer may wish to round to the nearest cfs. However, this may require additional mitigation as at Design Point 5, the 25 year storm event pre development peak is 4.44 cfs, rounding to 4 cfs and the post development peak 4.82 cfs rounds to 5 cfs.

Response:

In the November 18, 2009, discussion with R. Williams and A. Fetherston, it was agreed that the numbers in the DEIS could be shown to the same precision as the output from the HydroCAD program. The DEIS demonstrates the effort to maintain the pre-condition flows. Areas that are routed through low impact development practices are difficult to model in HydroCAD. The permeable pavers will provide additional attenuation or peak flow reduction through infiltration, however, this could not be modeled in the HydroCAD program.

59. There does not seem to be a hydraulic summation of Design Points 1A, 1B and 1C and the upstream areas at the culvert under Route 22. This is a critical design point where the peak flows need to be studied.

Response:

The design points 1A, 1B, and 1C have been routed and the combined flow is now shown in the Tables. The post-development peak flows generally occur at the same time as the pre-development condition.

Appendix G

60. Page 1-2, 1st line. The report is a Condensed Report Format as stated, however this format is only acceptable for small acreage projects, e.g., cell towers and well pads. The consultant should have used the standard format.

Response:

The use of a Condensed Report format was at the specific request of Cynthia Blakemore at the New York State Historic Preservation Office (NYSHPO) because previous archaeological studies had been undertaken on this site (1988-1989); and therefore, much of the standard required documentation had previously been compiled and is already on file at the NYSHPO.

61. The consultant did not develop an adequate site sensitivity model. The consultant correlated site sensitivity to prior disturbance, which is exactly what the SHPO says not to do. The discussion should be based on the site types likely to be identified that consider both ecological and cultural factors and their correlation to documented archaeological sites. Variables used to develop this model include: landform, soil type, depositional context, hydrology, geology, and floral and faunal communities. Values for these variables should compare across the existing site record in order to formulate a sensitivity model that considers access to resources and transportation routes as well as the suitability of specific landforms for occupation. Based on the results of background research, the project area should stratified into three probability rankings.

Response:

Landform, soil type, hydrology, geology, and location of previously identified archaeological sites are discussed at length in Chapters 4 and 5 of Appendix G, as well as previous ground disturbance. The identification of precontact-period archaeological sites within the area of potential effect (APE) by archaeologists in 1988-1989 obviates the need for speculative analysis on the overall suitability of the site conditions for Native American use, since it is known that Native Americans used the site. However, these factors (topography, soils, hydrology, etc.) were included in the analysis of sensitivity by the APE segment (see Chapter 5), for segments that had not been previously excavated. Designations of low, moderate, and high sensitivity are provided for each APE segment in Chapter 5.

62. Page 3-2, 5th paragraph. O'Conner's 1854 map of Putnam County is referenced, however it is not included in the report.

Response:

The O'Conner map is now included.

63. Figure 2. The consultant's definition of the APE is inadequate. Segments 2, 3, and 4 are isolated and the means to access those areas should be considered, as well as any infrastructure improvements that may be extended to those areas.

Response:

The APE includes all areas where ground disturbance is planned as part of the proposed project, including access and infrastructure elements, as described in Chapter 1, Section C of Phase 1A (Appendix G of the DEIS).

64. The report recommends archaeological testing, but lacks specifics.

Response:

Excavation of shovel test pits and/or monitoring is recommended according to the APE segment in Chapter 5. The DEIS was revised to note shovel pit test intervals.

Chapter 12

65. See previous discussion regarding the APE.

Response:

The APE boundary justification is provided in Chapter 12.

66. The methodology for the architectural survey is not clear.

Response:

Architectural resources methodology is included in Chapter 12. The DEIS was revised to explain the State/National Register eligibility criteria.

67. Page 12-8, *Potential Architectural Resources*. It doesn't appear that an intensive evaluation of the structures was completed, therefore it is not possible to make determination of non-eligibility.

Response:

As noted in Chapter 12, a reconnaissance-level field survey was performed by an architectural historian in order to evaluate the potential State/National Register of Historic Places eligibility of properties in the study area. This level of cultural resources survey is standard for compliance with the State Environmental Quality Review Act and the New York State Historic Preservation Act. The NYSHPO will make determinations of eligibility based on the information and recommendations provided in the chapter.

68. See previous discussion regarding site sensitivity. The report refers to "potentially sensitive"; an adequate model should be developed to qualify sensitivity to low, medium, or high.

Response:

Designations of low, moderate, and high archaeological sensitivity areas are included in Appendix G (Phase 1A, Chapter 5). The DEIS was revised to reiterate these sensitivity levels in Chapter 12.

Geotechnical

69. We reviewed the report and support documentation prepared by CRA dated 5/23/08. It is preliminary and relates to the buildings and is comprehensive and applicable. The report does not specifically address site improvements as roadwork, cut and fill slopes and pavement subgrades, and stormwater management to include percolation characteristics. The contents of the report, however, would be very useful for the site improvement preliminary design process.

Response:

This comment is noted.

Traffic Review

The following comments have been generated based on our review of the following documents:

Chapter 10: Traffic, Parking, and Public Transportation

Plan Sheets G-001, C-101, C-102, CS101, CS102, CS103, CS104, & CS105

Traffic Report

70. The traffic counts were conducted on Wednesday May 28th and Thursday May 29th 2008. For the year 2008, Memorial Day occurred on Monday May 26th. Generally, traffic conditions are less intense during holiday weeks due to commuters being absent from the roadway while on vacation.

Therefore, the base conditions which were collected by the applicant may not represent the typical traffic conditions during non-holiday weeks. The applicant should provide evidence that the manual turning counts were not impacted by the holiday week, or the applicant should recount the study intersections during a nonholiday week and revise the traffic report accordingly.

Response:

The counts were conducted on valid traffic data collection days when school was in session and when there was no inclement weather. The New York City Environmental Quality Review (CEQR) Technical Manual dated October 2001 states that traffic counts should not be done on a holiday, including the day before and after a holiday (see attached, also included in Appendix H). The counts were conducted two to three days after Memorial Day.

Page 8

71. The applicant provides capacity analysis for the AM, PM, Later PM and Saturday MidDay peak hours. The applicant should provide data as to the typical operation of the facility on Sunday mornings.

Response:

No services are conducted on site during the week or on Sunday mornings.

72. To establish the Background Growth portion of the No-Build traffic conditions, the applicant has increased the existing traffic volumes by an annual growth rate of 1.5%. The applicant should provide support for the use of a 1.5% annual growth rate.

Response:

Recent Traffic Impact Studies performed in the area utilized the following background growth factors:

- Patterson Crossing Retail Center - 1.5% annual growth rate
- Stateline Retail Center - 1.3% annual growth rate

The use of 1.5% annual growth is appropriate given the rates that were utilized in these other studies.

73. The applicant has generated or obtained the site generated trips for each of the development located adjacent to, or within the project study area, anticipated to be operational by the build year of 2014. The applicant should specify if the site generated trips for each development were generated as part of this report, or obtained from a traffic report previously conducted. For those site generated trips which were taken from an obtained traffic report, the applicant should include the volume figures from each referenced report within the appendix. Where the site generated trips have been generated by the applicant, a trip distribution figure should be prepared that depicts the distribution of each development.

Response:

As indicated on Table 10-5 the trip generation estimates for the following No Build projects (see below) were obtained utilizing Institute of Transportation Engineers (ITE) trip generation rates. The following (see below) were obtained from the applicant's traffic studies (the trip distribution graphics from these studies are attached and are included in the appendix).

Obtained from ITE

Barjac Equestrian Center (based on AKRF survey conducted at the Old Brookville Equestrian Center in June 2005)

Burdick Farms Subdivision

Cipriano Site Plan

Frantell Site Plan

Genovese Site Plan

Ice Pond View Subdivision

Paddock View Estates

Pondview Subdivision

17 Couch Road Corp. Subdivision

Tractor Supply Site Plan

Obtained from Applicant's Traffic Impact Studies

Patterson Crossing Retail Center

Stateline Retail Center

Orchard Hill (Trip Generation obtained from Stateline Retail Center DEIS and given its location approximately 10 miles south of the Watchtower site, it was conservatively estimated that approximate 2% would utilize Route 22 driving past Watchtower, see Appendix H)

The Reserve

74. The applicant states that The Institute of Transportation Engineers (ITE) does not provide trip generation rates for the proposed improvements. If this were considered as one large development, this statement would be true; however, the applicant later states that only the residential portion of the development will create an increase in site generated trips. ITE does provide trip generation rates for residential uses. The applicant should utilize the trip generation rates contained within the ITE Trip Generation Manual to determine the site generated trips due to the increase in residential units.

Response:

The use of ITE residential land use rates would not be appropriate for the proposed amended site plan project. ITE residential rates are for standard communities which peak during the traditional commuter AM and PM peak hours as residents travel to and from work, school, and other activities. This is clearly not the case with residents of Watchtower, which conduct most of their activities on site and generally leave for meetings off-site during the non-traditional commuter peak hours.

75. The applicant has estimated the increase of site generated trips for the proposed facility by creating trip generation rates based on the manual turning counts conducted at the site driveway during the AM, PM, Late PM, and Saturday Mid-Day peak hours. The trips rates determined by the applicant utilize the number of residents as the independent variable to determine the peak hour trips associated with the increase in residential units. The applicant states the other site improvements (Audio-Video Addition, Maintenance Building, North Office Building and other smaller buildings) will not create an increase in the site generated trips. The applicant should provide substantial evidence to support the claim that the additions (other than the increase in residential units) will not create an increase in site generated trips. It would appear, based on the parking proposed underneath the "North Office Building" and "Maintenance Building," that the applicant anticipates some sort of parking demand for these buildings. Therefore, one could logically anticipate an increase of trips

generated by the development due to the additional buildings, in addition to the increase from the residential units.

Response:

The other non-residential building additions associated with the amended site plan would not generate traffic as they will be used by both existing and new residents of Watchtower. These additions are being constructed to provide for greater efficiency on-site for Watchtower residents not as a new destination for other Watchtower members or guests from outside locations.

76. The applicant states the trip distribution of the site generated trips was determined from "information obtained from the applicant on its residents' trip patterns." The applicant should submit this information for review, and explain the methodology for collecting such information.

Response:

The DEIS has been revised to provide the information requested. This information provided was based on records of congregation assignments for WEC occupants and administrators' collective knowledge of occupant travel habits such as shopping.

Circulation

77. The applicant should elaborate as to the anticipated rate of bus arrivals, and the ability of the site to accommodate large numbers of busses arriving coincidentally.

Response:

The DEIS has been revised to provide the information requested.

78. The applicant shall submit turning templates to depict a bus successfully navigating the proposed bus parking area.

Response:

Additional information will be provided in a later stage of the approval process.

79. The applicant should specify the anticipated design vehicle for the development, and provide vehicle turning diagrams depicting such vehicle navigating the site.

Response:

A four-door passenger vehicle was used as the design vehicle. However, the fire access way was also checked against the fire truck apparatus. Vehicle turning diagrams will be provided in a later stage of the SEQR.

80. The applicant shall provide data explaining how and where vehicles will turn around after utilizing the over flow parking area depicted on Sheet CS104.

Response:

Additional information will be provided in a later stage of the approval process.

81. The application shall submit a circulation plan for the underground parking areas.

Response:

Additional information will be provided in a later stage of the approval process.

Parking

82. The applicant shall submit calculations showing that the proposed parking supply shall meet the anticipated parking demand for the development.

Response:

Additional information will be provided in a later stage of the approval process.

Capacity Analysis Sheet

83. The applicant has utilized a 30% Right Turn on Red (RTOR) reduction for each signalized intersection within the study area, where such movement exists. The Highway Capacity Manual (HCM), which sets the standard methodology for such reductions, recommends that field counts be conducted to establish the number of right turns which occur during the red phase for each movement at each signalized intersection. Where no such data exists, HCM specifically states that no RTORs should be utilized. The use of a RTOR reduction will have a large impact on the results of the capacity analysis. Therefore, the applicant should provide counts which justify the use of 30% RTOR reduction for each right turn movement at each signalized intersection.

Response:

Additional observations and counts were conducted in January 2010 to confirm the use of a 30 percent RTOR utilized in the HCM analysis at the study area's two signalized intersections. The results of the counts are summarized below:

Intersection	Approach/Movement	RTOR Volume/Total Right-Turn Volume (Percentage of Right-Turn Volume Making RTOR)			
		Peak Hour			
		AM	Early PM	Late PM	Sat.
Route 22/Route 68	WB Right	48/90 (53.3%)	141/185 (76.2%)	75/166 (45.2%)	30/70 (42.9%)
	NB Right	21/45 (46.7%)	60/180 (33.3%)	85/178 (47.8%)	33/86 (38.4%)
Route 22/Route 311	SB Right	109/280 (38.9%)	40/140 (28.6%) ⁽¹⁾	41/103 (39.8%)	30/92 (32.6%)
	EB Right	31/106 (29.2%) ⁽¹⁾	32/86 (37.2%)	31/99 (31.3%)	30/79 (38.0%)

Note:
(1) The use of 28.6% or 29.2% as opposed to 30.0% would not materially change the results of the HCM analysis.

The use of a 30% RTOR is justified based on the latest counts and observations.

84. The applicant has analyzed the westbound approach for the signalized intersection of Route 22 & Route 68 as a two lane approach, with an 8.5' dedicated right turn lane, and an 8.5' shared left/thru lane. However, based on a review of the existing conditions, the approach is striped as one approach lane for all turning movements. The applicant should provide data to support the use of two lanes rather than one lane permitted all turning movements.

Response:

The DEIS has been revised to provide the information requested.

85. The applicant should submit capacity analysis summary sheets that depict the Peak Hour Factor (PHF) utilized for the analysis of each signalized intersection. It is noted that the "Short Report" contained within the Highway Capacity Software Plus (The software utilized by the applicant for capacity analysis) provides such data, and could be included for each signalized intersection.

Response:

The PHF used in the analysis for all study area intersections are in Appendix H, shown on the Turning Movement Count sheets and also on the Highway Capacity Software (HCS) output sheets.

Plan Review

86. Our general review of the site plan is that safe pedestrian circulation is lacking between the proposed parking bus area, and the main portion of the site. To address such, the applicant should revise or submit additional plans depicting the following per the Manual of Uniform Traffic Control Devices (MUTCD) and local requirements; crosswalks with appropriate signage, stop bars, sidewalks to/from the proposed overflow parking area, speed limit signs and stop signs.

Response:

Additional information will be provided in a later stage of the approval process.

Review of Economic Analysis

87. The economic analysis prepared for the Watchtower Education Center (WEC) IS a thorough analysis that addresses the requirements of the DEIS scoping document. The analysis used the Regional Input-Output Modeling System (RIMS II) developed by the U.S. Department of Commerce to project regional economic impacts as well as a traditional analysis of tax payments to local jurisdictions in comparison to the services required from the Town, County and local school district. Of note is the fact that the WEC is exempt from federal, state and local taxes due to the applicant's status as a tax exempt organization. This is especially significant given the assessed value of Watchtower holdings was \$177,181,900 in 2008.

Response:

This comment is noted.

88. Despite the tax exempt status Watchtower does voluntarily pay taxes on the Patterson Inn which provides lodging for visitors and guests. The Patterson Inn had an assessed value of \$14,850,300 in 2008 (approximately 8% of total Watchtower holdings) and \$344,563 of tax payments were made to the various taxing jurisdictions (see table following). Another Watchtower holding, Valley Farms Corporation, also voluntarily pays taxes but those tax payments only amounted to a combined total of \$414.93 for all taxing jurisdictions in 2008.

Patterson Inn — 2008 Tax Payments

Taxing Jurisdiction	Taxes Paid
Putnam County	\$ 30,413
Town of Patterson	\$ 46,429
Patterson Library	\$ 4,180
Patterson Fire District No.1	\$ 10,942
Park District	\$ 1,301
Carmel Central School District	\$251,298
Total	\$344,563

Sources: Applicant's Economic Analysis and Town of Patterson Tax Receiver's Office, 2008 County and Town Tax Bill, and 2008-2009 Carmel Central School District Tax Bill.

Response:

This comment is noted.

89. Although Watchtower contributed only a modest sum in tax payments given the size and assessed value of the holdings, this is tempered by the fact that very little is required in the way of services from the Town of Patterson, Putnam County and Carmel Central School District. WEC properties are provided with 24 hour private security. An on-site infirmary with two full-time physicians and 16 registered nurses and on-site ambulance is provided and there are 14 emergency medical technicians (EMT's) on site. Recreational facilities are provided on site as are library facilities. There are no school-aged children residing at the WEC so there is no demand on the Carmel Central School District. Refuse is handled by a private contractor under contract to WEC. The only demands placed on local services are limited to medical services for WEC residents with more serious medical conditions who must be treated at area hospitals, and fire protection and police protection services. Fire protection services are provided by the Patterson Fire District and police protection is provided by the County Sheriff and New York State Police.

Response:

This comment is noted.

90. The economic analysis includes the secondary or induced impacts flowing from the construction of the WEC project. This analysis is performed using the RIMS II regional input-output model. A primary input to the model is the number of construction jobs and the salaries associated with those jobs. It is projected that 166 new construction jobs would be created during the four year construction period (664 person years for the combined four years). This total number is apparently used as input to the model.

However, it is stated in the economic analysis that it is anticipated the 75 percent of the construction labor demand would be met through volunteers. If this is the case then the regional economic impact is overstated since the volunteers would not be drawing the additional or new salary that was input to the model.

Response:

The calculation of construction employment is an output of the RIMS II model and accurately reflects the amount of direct labor (paid or unpaid) that would be required to construct the project. However, the relationships in the model for employment, wages and salaries, and economic output are based on a \$120 million construction cost input that does not assume volunteer labor. Subsequent to the initial analysis, it was estimated that 75 percent of the construction labor demand would be met through volunteers, with the remaining 25 percent through contracted personnel. Both the text and Table 13-6 reflect that paid employment and wages and salaries would be reduced if volunteers were used. In addition to direct employment and wages and salaries, indirect and induced benefits would also be reduced, but at a rate far less than the proportionate reduction in direct wages and salaries, because purchases by the project would still generate indirect and induced impacts. The reduction in indirect and induced impacts would not alter the finding that the project would result in substantial economic benefits to the region.



TOWN OF PATTERSON
CODE ENFORCEMENT OFFICE
PUTNAM COUNTY
P.O. Box 470
Patterson, NY 12563

NICK LAMBERTI
Director of Codes Enforcement

Tel (845)878-6319
Fax (845)878-2019

January 6, 2010

Mr. Joel Heier
Watchtower Bible & Tract Society
100 Watchtower Drive
Patterson, New York 12563


RE: TM - 14.-1-53
FIRE ACCESS ROAD WIDTH REQUIREMENTS

Dear Mr. Heier,

As you may recall, in early December of last year and during an inspection of another project, we had a conversation regarding the proposed roadway for future projects at the Watchtower Complex. As I stated to you at that time, I would accept your proposal of a roadway that was at least 20 feet wide, paved with concrete or asphalt and the remaining 6 foot width to be completed with geoblock grid material on both sides of the driveway. A condition I would add is that the geoblock material be installed and rated to handle the weight of vehicles such as fire apparatus, etc.

If you have any questions or comments, please feel free to contact me.

Sincerely,



Nicholas Lamberti,
Director of Code Enforcement

NL/cs

cc: D. Raines


WATCHTOWER
Bible and Tract Society of New York, Inc.
100 Watchtower Drive, Patterson, NY 12563-9204, U.S.A.
Phone: (845) 306-1000

December 18, 2009

Nicholas Lamberti
Director of Code Enforcement
Town of Patterson
PO Box 470
Patterson, NY 12563

Re: Request for comments on road width requirements

Dear Mr. Lamberti:

We are writing to request your comments on road width requirements related to proposed construction at the Watchtower Educational Center. Specifically, we would like to know if you agree with our approach to meeting the road width required in Appendix D of the Fire Code of New York State (FD 105.2).

FD 105.2 states: "Fire apparatus access roads shall have a minimum unobstructed width of 26 feet (7925 mm) in the immediate vicinity of any building or portion of building more than 30 feet (9144 mm) in height." We propose to meet this '26-foot wide' requirement in some areas by using a geoblock-type grid system in conjunction with and parallel to the concrete surface.

Thank you for providing your comments on whether this is an acceptable approach to meet the requirements of the Fire Code. Please send your reply to Joel Heier at the address noted above.

Sincerely,


OF NEW YORK, INC.

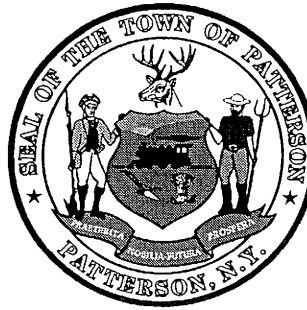
PLANNING DEPARTMENT

P.O. Box 470
1142 Route 311
Patterson, NY 12563

Michelle Russo
Sarah Wagar
Secretary

Richard Williams
Town Planner

Telephone (845) 878-6500
FAX (845) 878-2019



**TOWN OF PATTERSON
PLANNING & ZONING OFFICE**

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Lars Olenius
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David Pierro, Vice Chairman
Michael Montesano
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Charles Cook

MEMO

TO: Planning Board

FROM: Ted Kozlowski, ECI

RE: Watchtower Educational Center Waste Soil Deposition Site Assessments

DATE: December 8, 2009

On December 4, 2009 I met with representatives of Watchtower and Jim Nash of AKRF to review and discuss the two potential soil deposition sites on the Watchtower property as it relates to their Educational Center DEIS. I wish to recap and advise the Board on our site evaluation for your consideration of this project:

Site I – Existing Soil Deposition Area - This is a forested hill with many rocky outcroppings on the eastern side of the property, above the campus. Part of this site is an existing soil and debris deposition area and is surrounded by upland central hardwoods, dominated by mixed oaks with beech and maple associates. In order to use this site for the project a substantial portion of forest will need to be clearcut and the fill will be within 100 feet of a Town regulated wetland, which serves as the headwaters of an unnamed class "C" stream that flows west through the campus and eventually into the Great Swamp. At certain points the fill will pile upwards to 30 feet in elevation that may have impacts on the view shed, especially during the dormant season.

If this site is selected, I recommend that the applicant preserve as many trees within the fill zone as possible, especially at the extreme south limits of disturbance, to maintain a visual buffer and to protect slopes that drain into the stream. Additionally, the hundreds of trees that are to be removed will present a disposal challenge. Many of these trees are of sawtimber quality and should be utilized as such. Logging them prior to work will help clear the site, use the wood as a resource and possibly generate income to the applicant. The fill will need to have erosion controls and be stabilized with either meadow seed mix or planted up with tree seedlings to restore it to forest. A restoration plan for the clearcut and soil deposition should be incorporated within the final EIS. Finally, the applicant will need to protect the depressional area between the top of slope where the fill ends on the west side and the toe of slope of the eastern steep hillside that

defines the headwaters of the stream. Additionally, the southern end of the fill side will need to be engineered to protect the stream from runoff. While the fill will be within 100 feet of the regulated wetland and stream, the site can be protected with properly engineered erosion controls. I also agreed that the applicant can (and should) delineate this wetland in the Spring of 2010.

Site II – Alternate Excess Soil Deposition Area – This is an open pasture located within the northern section of the property. Currently it is used as pasture by the farm animals and is an aesthetic resource. This site does not have the challenges of wetlands, rock outcrop, steep slopes and forest clearcutting. However, the applicant will either need to use a portion of State Rout 22 to access the site with their heavy equipment and fill trucks, presenting a traffic challenge, or construct a bridge and roadway that will impact Mt. Brook, a class “C” stream.

If this site is selected I recommend that the fill be distributed in sections that can be managed in such a way as to reduce visual impacts by filling limited areas at a time and quickly stabilizing with pasture seed mix before filling in a new section. The fill will not be piled as high as proposed on Site I as it can be spread out further without any clearcutting. In addition, I feel the erosion controls and engineering costs will likely be less for this site than for Site I. Visual impacts will be temporary and the site will be quickly restored to pasture. As with Site I, a restoration plan for the pasture area (if selected) should be included within the final EIS.

While the applicant wishes to avoid the time consuming permit process to construct a bridge, it may benefit Watchtower in the long run as they will have a permanent access point to their property north of Mt. Brook without impacting Route 22. This has future planning possibilities that can be free of stream crossing impacts. Of the two sites I feel this site has the least environmental impacts and will be restored much quicker.

I am confident Watchtower will properly control erosion and restore whichever site is selected.

CC:

Town Planner

Maser Consulting

Jim Nash, AKRF

Mark Coles, Watchtower

Richard Eldred, PE, Watchtower

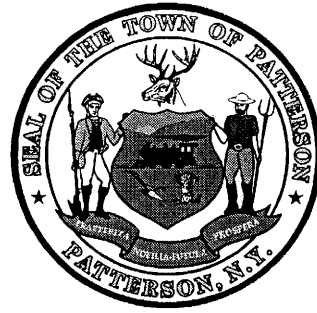
PLANNING DEPARTMENT

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**TOWN OF PATTERSON
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PLANNING BOARD

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David Pierro, Vice Chairman
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Charles Cook

November 5, 2009

Town of Patterson
Planning Board
P.O. Box 470
1142 Route 311
Patterson, NY 12563

Re: Watchtower Education Center
Route 22
Tax Map No.14.-1-53, 14.-1-54

PROJECT REVIEW

Dear Chairman and Board Members:

I have reviewed the Draft Environmental Impact Statement dated July 21, 2009 submitted for the Watchtower Education Center. The purpose of the review is to determine if the DEIS adequately addresses the issues identified in the Final Scope for the Project adopted by the Board as lead agency on July 2, 2002. The scoping document was subsequently amended by the Board on December 6, 2007.

Once the Draft Environmental Impact Statement is determined by the Board to have adequately addressed the issues raised in the Final Scope, a public hearing should be scheduled on the DEIS. The public hearing must be published not less than 14 days prior to the date of the scheduled date of the public hearing. In addition, notice must be prepared, filed and published in accordance with 6NYCRR 617.12(a) and (b). The date of the public hearing may not be more than 60 days after publication of the notice of completion. The Board should also hold the public hearing on the DEIS concurrently with the public hearing on the site plan. The Board should also determine an appropriate period of time subsequent to the public hearing for which written comments on the DEIS will be received, recognizing that the minimum comment period can not be less than 30 days from publication of the notice of completion and 10 days following any public hearing. Finally, effective on Feb. 26, 2006 the DEIS, FEIS and findings statement must be posted on the Town's website.

Based on a review of the draft Environmental Impact Statement I believe that the following issues should be addressed prior to the document being deemed complete by the Board.

1. Preceding the Executive Summary should be a list of all the consultants that contributed to preparation of the DEIS, or supporting studies. The list should include names, addresses, FAX numbers and project responsibilities.
2. Chapter 1.A "Project Description" (Page 1-2) the number of new residential units in "G Residence" and "H Residence" should be provided, along with the number of 1-bedroom units, 2- bedroom units, etc.
3. Chapter 1.B "Construction" (page 1-8) notes that "up to 10 acres may be disturbed at one time...". The DEIS should discuss the requirements pursuant to the General Permit for exceeding the 5 acre limit (Part II.C.3)
4. Chapter 1.B "Effects on the Use and Conservation of Energy Resources" (page 1-11) A discussion of the proposed upgrades to the NYSEG Haviland Hollow substation should be discussed.
5. Table 1-1 The height variance for the fence should be added.
6. Table 1-1 a wetland/watercourse permit must be approved by the Patterson Planning Board for the encroachments within 100' of a watercourse.
7. Table 1-1 pursuant to §154-71 and their authority for approval of a site plan, the Planning Board must grant a waiver for the reduced parking dimensions.
8. Table 1-1 Patterson's Code requires that all driveways and parking areas must have an asphalt or concrete surface unless a waiver is granted from the Planning Board.
9. Chapter 2.A "Introduction" (Page 2-1, last paragraph) a variance for parking dimensions from the ZBA is not required. A waiver of the standards from the Planning Board will be required.
10. Chapter 2.B "Project Location and Site Definition" (Page 2-2) The project proposes 421 new parking spaces. The justification for the number of parking spaces should be provided, taking into consideration that there will be 500 new residents.
11. Chapter 3.B "Land Use" (Page 3-2) Hamlets are typically small areas of mixed residential and commercial use. There are several small commercial enterprises at, and around the intersection of Haviland Hollow Road and NYS Route 22. However, there is not associated

with this intersection a residential component which would allow this area to be classified as a hamlet.

12. Figure 3-1 “Existing Land Use”. It was noted there are several inconsistencies with the map presented. A few examples are:
 - Tax Map No. 14.-1-2 should be shown as Open Space Recreation Area.
 - Tax Map No. 13.-3-37 is owned by the Town of Patterson and is a former landfill. This should be shown as Institutional.
 - Tax Map No. 35.-5-37 is vacant land, not agricultural
 - Tax Map No. 36.-3-10 and Tax Map No. 24.-2-55.3 are both agricultural.
 - Tax Map No. 14.-1-30 and 14.-1-31 are commercial, not transportation.
 - Tax Map No. 24.-1-26 is institutional or commercial, not vacant land.
13. Chapter 3.B “Existing Conditions, Surrounding , Adjacent and On-site Land Uses” (Page 3-3, 2nd paragraph) “Beach Hollow Center” should be “Birch Hollow Center”. In addition, there is a party catering business that maintains a warehouse at the site. It is not a “party store”.
14. Chapter 3.C “The future without the proposed project” (page 3-6) The last paragraph provides that the Town Zoning Code was recently amended on March 31, 2007. There have been a number of changes to the zoning code since that date. The most recent change was adopted by the Town Board on July 22, 2009.
15. Chapter 3.D “Probable Impacts of the Proposed Project, Zoning” (Page 3-7) a variance for parking dimensions from the ZBA is not required. A waiver of the standards from the Planning Board will be required.
16. Chapter 3.D “Probable Impacts of the Proposed Project, Zoning” (Page 3-7) A brief discussion of the height variances that are needed is provided in this section, but no discussion is provided concerning the “probable impacts”. Also no justification is provided within this section to demonstrate a need for the area variances for height.
17. Chapter 3. The height variance for the fence is not discussed.
18. Chapter 3. (Page 3-8) Patterson’s Zoning Code permits a building coverage of 15% for educational centers. The DEIS provides a table showing the existing and proposed building coverage. This section should also include a discussion of the original height variance, which was proposed to “reduce the footprint”. This discussion should include the building coverage that would have occurred had the variance not been granted. In addition, this section should provide the building coverage that would occur if the presently requested variance for height is not granted.

19. Chapter 4.B "Existing Conditions, Putnam County Sheriff's Office" (Page 4-2) the number of E-911 calls that have been made from WEC should be provided.
20. Table 5-2 shows the area of disturbance as 57.1 acres. Chapter 1.B "Natural Resources" (Page 1-5) states that total site disturbance will be 49.1 acres. (Also "Construction" pg 1-8). If the difference between the area of disturbance shown on Table 5-2, and the area of disturbance provided in Chapter 1 are areas of overlap between the phases, this should be noted.
21. Chapter 5.C "Surface Soils, Stormwater Pollution Prevention Plan" (Page 5-14). It should be noted that the Town of Patterson is a "regulated, traditional land use control MS4" and as such the SWPPP will be reviewed by the Town and a MS4 SWPPP Acceptance form issued. The Acceptance form must be submitted with the NOI (Part II.A.2).
22. Chapter 6.B "Existing Conditions" (Page 6-2) the results of the well tests should be included in the DEIS.
23. Chapter 6.D "Potable Water Supply" (Page 6-8) the discussion of water usage should focus on the peak water and wastewater demand, and not the average.
24. Chapter 6.D "Aquifer Recharge" Clearly there is adequate recharge from the WEC site for the surrounding region . However, groundwater flow in the area of WEC is generally towards the south, southwest, away from the wells. The DEIS should discuss the recharge to the sand and gravel wells from the area which contributes to their recharge.
25. Chapter 6.D "Wastewater" (Page 6-10, footnote) the average annual rainfall appears to be overestimated. Other sources such as the Soil Survey of Putnam and Westchester County, or NYS Guidelines for Urban Erosion and Sediment Control place the average annual rainfall at 44 to 45 inches.
26. Chapter 6.D "Wastewater" (Page 6-10, footnote) The amount of recharge appears to be overestimated. The majority of the site appears to be glacial till comprised of loam, silty-loam soils. Wolcott & Snow (1995) found an annual recharge of 8.45" on till or silty/clay soils. Gerber (1982) found recharge rates on silty/clay soils or till deposits of 2.3" to 6.8". It appears that the recharge analysis has used an estimated annual recharge of 12". Justification for the use of 12" of annual recharge should be provided.
27. Chapter 7.C "Hydrology Model" Table 7-1 provides the rainfall values used in the model. These values do not reflect the most current rainfall values for the region which can be obtained from the Northeast Regional Climate Data Center (See NYS SMDM, Chapter 10, page 10-11).

RAINFALL VALUES ¹	
Return Period	Rainfall Value (inches)
1yr-24hr	3.1
2yr-24hr	3.5
10yr-24hr	5.5
25yr-24hr	6.0
100 yr-24 hr	9.5
¹ Source: northeast Regional Climate Center	

28. Chapter 7.D “Pre-Development Conditions” (Page 7-4) The discussion of Mountain Brook should include that the stream, as it crosses the WEC site is a 2nd Order stream with its source originating both on WEC’s site and also on the State lands to the east.
29. Chapter 7.F “Post-construction Stormwater Management Practices” (Page 7-8)The section should include an evaluation of Better Site Design practices as required by Chapter 10 and the General Permit.
30. Chapter 7.F “Additional Stormwater Management Design Features” (Page 7-10) discusses the use of low-impact development practices throughout the site “where feasible”. Additional discussion should be included about the LID/BSD/distributed controls that will be used, or those that were considered and rejected. The discussion should include an evaluation of the percentage of impervious area, by each hydrologic soil, group to be directed to a LID/BSD or standard infiltration practice.
31. Page 7-11, 2nd paragraph last, sentence “Because there is no net increase in”
32. Chapter 7.F “Pollutant Loading Analysis” (Page 7-13) The pollutant loading rates used in the analysis of Design Point 1 were based on the wet pond design, Design 6 in “Reducing the Impacts of Stormwater Runoff from New Development”. The DEIS notes that the design requirements for this pond require that the permanent pool equal four times the runoff volume of 0.5inches. What has been omitted is to reach the higher pollutant removal achieved by Design 6 requires a permanent pool with a residence time of 2 weeks. The DEIS should confirm that a two week residence time will exist in order to take credit for the removal rates suggested.
33. Chapter 7.F “Project Phasing” (Page 7-16) The DEIS should discuss the NYS DEC requirements for exceeding 10 acres of disturbance.

34. Chapter 8.B “Wetlands” and “Streams” (Page 8-2) The DEIS twice references Patterson’s wetland code as §158-18. The correct reference is §154-18.
35. Chapter 8.C “Wetland Delineation” (Page 8-6) The DEIS discusses that two locations are under consideration where excess soil will be deposited. The DEIS also states that *after* one of the two locations is chosen by the lead agency (or Town?), the chosen site would be examined ... to determine the presence or absence of regulated wetlands. Since the presence of any wetland would be a factor to be considered in the appropriateness of the use of either location for placement of excess soil, this evaluation should be made now, and included in the DEIS.
36. Chapter 9.D “Probable Impacts of Proposed Project” (Page 9-17) The DEIS notes that the site chosen for placing the excess soil will be evaluated for rare or endangered species once the site is chosen. Since the presence of rare or endangered species would be a factor to be considered in the appropriateness of the use of either location for placement of excess soil, this evaluation should be made now, and included in the DEIS.
37. Chapter 10.A “Principal Conclusions” states that there will be no significant traffic impacts from the proposed project. The DEIS should either provide the underlying basis for this conclusion, or acknowledge the conclusion as the Applicant’s opinion.
38. Chapter 10.A “Principal Conclusions” Any traffic analysis should be conducted at a sufficient level to determine the level of impacts and mitigation required. This includes any evaluation of whether signalization of WEC driveway intersections with NYS Route 22 is required.
39. Chapter 10.D “The Future without the Proposed Project” (Page 10-8) under Other Development Projects the Burdick Farms Subdivision had received conditional approval. The conditions of the approval were not met within the allotted times and the approval has expired. The original Applicant has chosen not to proceed with the subdivision and has sold the property.
40. Chapter 10, Table 10-5, See above concerning Burdick Farms.
41. Chapter 13.C Table 13-5 See above concerning Burdick Farms. Also, 17 Couch Road Subdivision has received conditional final approval and Tractor Supply plans to open in November of 2009.
42. Chapter 13.D “Summary of Construction Impacts” (Page 13-12) states “To the extent that local services in the Town of Patterson would be affected, actions would be taken to minimize the impact”. Any mitigation must be discussed in the DEIS.

43. Chapter 14.B “Schedule and Construction Stages and Phasing” (Page 14-3) states, “A waiver would be sought from the NYS DEC for the phase areas larger than 5 acres”. This section should discuss the waiver requirements under the general permit (GP-0-08-001Part II.C.3) and acknowledge that the waiver, pursuant to the General Permit, comes from the Town of Patterson as a regulated MS4.
44. Chapter 16 “Alternative Site Plan Layout” SEQRA requires that “[t]he description and evaluation of each alternative should be at a level of detail sufficient to permit a comparative assessment of the alternatives discussed”[617.9(b)(5)(v)]. Discussion of alternatives presented do not meet this requirement. For example, under “Geography, soils and Topography” the DEIS acknowledges that this alternative will result in “substantially more blasting, grading and excavation, and disturbance of steep slopes” but does not quantify the amount of increase.
45. Chapter 16 “Reduced Project Size Alternative” no discussion on a reduced project size has been presented, and therefore no comparative assessment can be made of this alternative.

Respectfully submitted,

Richard Williams Sr.
TOWN PLANNER

cc: Maser Consulting PA
Ted Kozlowski, ECI
Building Department
Curtiss & Leibell, P.C.
Applicant



Consulting, Municipal & Environmental Engineers
Planners * Surveyors * Landscape Architects

1607 Route 300, Suite 101
Newburgh, NY 12550
Tel: 845.564.4495 * Fax: 845.564.0278

MEMORANDUM

To: Town of Patterson Planning Board

Cc: Rich Williams, Sr.

From: Andrew Fetherston

Date: 11/05/09

**Re: The Watchtower Bible and Tract Society Amended Site Plan
MC Project No. YPP021**

The following Items have been reviewed:

- Final Scoping Document adopted July 2, 2002; Amended December 6, 2007 and prepared by the Town of Patterson.
- Draft Environmental Impact Statement, dated July 2009 and prepared by AKRF.
- Cover Sheet, latest revision dated July 9, 2009, sheet G-001
- Existing Conditions Plan, latest revision dated July 9, 2009, sheet C-101
- Proposed Site Plan, latest revision dated July 9, 2009, sheet C-102
- Watercourse Delineation Plan – South, latest revision dated July 9, 2009, sheet C-105
- Watercourse Delineation Plan – North, latest revision dated July 9, 2009, sheet C-106
- Overall Construction Phasing Plan, latest revision dated July 9, 2009, sheet CD101
- Erosion and Sediment Control Plan, latest revision dated July 9, 2009, sheets CE101-108
- Grading and Drainage Plan, latest revision dated July 9, 2009, sheets CG101-107
- Erosion Control Details, latest revision dated July 9, 2009, sheets CG501-503
- Layout Plan, latest revision dated July 9, 2009, sheets CS101-105
- Landscaping Site Plan, latest revision dated July 9, 2009, sheet LD001
- Landscaping Sections, latest revision dated July 9, 2009, sheets LD101-107
- Residence Plans, latest revision dated July 9, 2009, sheet A-101
- Audio-Video Services – Plan, latest revision dated July 9, 2009, sheet A-102
- Maintenance/North Office Plans – Cellar 2-First Floor, latest revision dated July 9, 2009, sheet A-103
- Maintenance/North Office Plans – Second-Fifth Floor, latest revision dated July 9, 2009, sheet A-104
- Service Buildings, latest revision dated July 9, 2009, sheet A-105
- Exterior Elevations and Sections, latest revision dated July 9, 2009, sheet A-201
- Alternate Site Plan – Zoning Height Compliance, latest revision dated July 9, 2009, sheet AS102
- Site Lighting Plan, latest revision dated July 9, 2009, sheets ES101-102, 104-105
- Pre-Development Drainage Map, latest revision dated July 9, 2009, sheet C-1
- Post-Development Drainage Map, latest revision dated July 9, 2009, sheet C-2



We have reviewed the above mentioned application and offer the following comments:

Comments on the plans:

Sheet CE101:

1. A level spreader near the temporary construction trailers appears to be proposed to discharge onto a paved area.
2. Temporary Sediment Basin SB-01 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed.
3. Show the actual dimension of Sediment Trap ST-01.

Sheet CE104

4. Temporary Sediment Basin SB-02 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed.

Sheet CE106

5. Temporary Sediment Basin SB-03 appears to have insufficient sediment storage shown for the area contributing runoff (3,600 cf/acre). Clarify the sediment storage proposed.
6. The Alternate Excess Soil Area (North Pasture) is channelizing runoff by proposing silt perpendicular to the contours on the east side of the stockpile. Methods for slowing and controlling this concentrated flow should be proposed.

Sheet CE107

7. The Existing Excess Soil Area is allowing runoff to discharge from the east and west sides of the stockpile. Additional silt fence and/or other methods for slowing and controlling this runoff from the stockpile should be proposed.

Sheet CG101

8. Drainage on the uphill (East) side of the Audio-Video Building Addition proposes to pipe storm drainage under the proposed building. While this is strongly discouraged and alternate routes should be investigated, details of this proposal are required.
9. Show on the plans where roadway access is taken to the 15' wide maintenance road for Stormwater Pond #1.

Sheet CG102

10. Identify the seven (7) symbols in the Bus Parking Area island and the five (5) symbols in the porous pavement.
11. Label the proposed contours in the Bus and Visitors Parking Lots.

Sheet CG104

12. Outlet protection is required on the storm drain discharging from Storm water Pond #2.
13. Unpaved roads are not shown southeast of the Recycling Building, but the grading for the roads are. Show the unpaved roads on this drawing.



Sheet CG501

14. On Detail 3, Temporary Sediment Basin, provide dimensions or a table of dimensions where a question mark (?) is presently shown.
15. On Detail 3, Temporary Sediment Basin, provide stabilized outlet dimensions, which are not presently shown on the plans as stated on the detail.
16. Detail 4, Earth Dike identify each dike on the plans as A-1, B-5 etc. Clarify if a perimeter dike or earth dike is proposed based on constraints like contributing drainage area, etc. An earth dike may be required over a perimeter dike north of the Audio-Video Building Addition.

Sheet CG503

17. Specify the filter fabric on the perforated riser proposed on Detail 1 – Pipe Outlet Sediment Trap.

Sheet CS101

18. I request the Building Inspector review the twenty (20) foot road width proposed on the west side of the proposed North Office Building and surrounding the proposed G and H residences. I believe the NYS building code requires a 26 foot wide road due to the height of the proposed building.

CS103

19. A waiver is required for the undersized parking spaces proposed near the Patterson Inn.

CS104 and CS105

20. Dimension the overflow parking (diagonal).

CU101

21. The water and storm sewer does not appear to have 10 feet of horizontal separation. Clarify how the potable water system is being protected.

LD101

22. General note #2, Provide a planting schedule (i.e. species, names, quantity, installation size, spacing, etc.) and planting design for the proposed roof top plantings.
23. General note #3, detail the proposed seed mixture for the mowable strip along the roadway (Typical for each landscape plan in the set).
24. General note #4, provide the desired species or specify the supplier for the native wildflower mixture (Typical for each landscape plan in the set).
25. Relocate the Norway Spruce proposed to be planted with in the stormwater basin #1 maintenance road.
26. Proposed plantings are to be installed on top of underground utilities in numerous locations. Revise planting layout as necessary (Typical for each landscape plan in the set).



27. Provide a planting scheme and schedule for the proposed areas labeled "Various Shrubs to be Determined Later" (Typical for each landscape plan in the set).
28. The individual tree symbols for the plant material is easy to read however there is no schedule which quantifies the proposed plantings. Provide in a plant schedule; include botanical/common names, quantity, installation size, root condition, etc. (Typical for each landscape plan in the set).
29. Plant symbol for the White, Black & Colorado Spruce use the same tree symbol. Provide labels to differentiate.
30. Identify the existing tree symbols to the legend (Typical for each landscape plan in the set).
31. Clarify planting hatches which are not listed in the legend (Typical for each landscape plan in the set).
32. This plan is proposing plantings on the maintenance road. Confirm that this will be a suitable, drivable surface.
33. Confirm that the plantings proposed for the stormwater basin berm are mowable lawns, where visible signs of seepage and other sources of failure would be detectable.
34. It appears ½ the road by the North Office Building is proposed to be planted. Please clarify the surface treatment in this area.

LD102

35. General note #2, does not provide a planting scheme or schedule for the proposed plant material to be installed for the converted woods areas.
36. Additional spacing for growth should be provided for the proposed Thundercloud Plum plantings at the access drive to the bus/visitor parking area.

LD103

37. Refer to the comments above for LD101 & LD102 regarding additional information on plant material.

LD104

38. Existing and proposed tree symbols are depicted in a similar boldness. Clarify the difference.
39. An alternate plant selection, preferably native, should be provided for the Crimson King Norway Maple which is considered an invasive species.
40. A partly graded serpentine road is shown west of the road adjacent to storm water basin #2. The purpose of this road needs to be clarified.
41. Similar to stormwater basin #1, this plan is proposing plantings on the maintenance road. Confirm that this will be a suitable, drivable surface.



LD105

42. Provide construction details for the proposed gates and fencing at the site entrance on Route 22.
43. Adjust location of the proposed Norway Spruce at intersection to improve site distance.
44. Additional spacing for growth should be provided for the proposed Thundercloud Plum plantings at the access drive to the bus/visitor parking area.

LD106

45. General note #3, detail the proposed pasture seed mixture.

LD107

46. Provide note referencing the "Existing Vegetation Protection" detail on sheet CG502.
47. Provide tree species and caliper to each of the trees to be removed.
48. Add the following "Tree Protection Notes:"
 - a. Tree protection fencing to be installed along the proposed disturbance limit line and prior to any clearing or grubbing.
 - b. There shall be no storage of construction equipment or materials outside the clearing limit. No construction activity is permitted outside of the proposed clearing limits.
 - c. Fencing should remain in good condition for the duration of the construction period. Damaged fencing shall be repaired within one (1) day of occurrence.

AS102

49. Although this plan shows a layout of buildings supposedly meeting the zoning height requirements, the feasibility of this layout is in question as no storm water facilities are proposed to mitigate for this increased impervious coverage. The West Office Building and K Residence are shown on AS102 in areas to be used for stormwater basins on the preferred site plan set.

ES101-ES105

50. Illumination for proposed parking and walkways should meet Illuminating Engineering Society of North America (IESNA) recommended levels.
51. Confirm that the proposed bollard light fixture has a covered/shielded top and not open to night sky.
52. Pole mounted fixtures are proposed at a mounting height of 18 feet. Within a residential zoning district the maximum height allowable is 12 feet however schools, day care centers and churches are exempt. Planning Board to confirm the project is or is not exempt from this requirement.



53. Point-by-point illumination levels extend well beyond the proposed lighting areas and read at a level of 0.00 footcandles. Provide the photometric boundary utilized for the "Footcandle Calculation Summary" on each sheet.
54. Per the plan notes, lighting calculations only include the proposed lighting fixtures. In areas where proposed lighting is to be installed and existing lighting in the area will contribute to illumination levels, provide the levels of existing lighting as well.

Comments on the Stormwater Management:

55. Soil test locations have been shown on drawing C101, Site improvements have been shown on C102, and Soil types are noted on the pre and post drainage maps, drawings C1 and C2. In reviewing the soil test locations vs the proposed improvements vs the soil types, it is apparent additional testing is required. For example, in the vicinity of the proposed pervious parking near Existing Building C, The Patterson Inn, no soil testing has been done and the soil type (SbC) is noted to have moderate to slow permeability. Testing is required at all proposed areas of permeable pavement.
56. Information of a number of soil test pits has not been provided (pits 2-14, 21, 26). Provide the test pit logs for these soil test pits.
57. Table 7-4 on page 27 of the Preliminary SWPPP shows an increase (typographical error?) in the proposed condition peak flow for the 100-year storm event for DP 1A. Table 7-4 page 7-12 in Chapter 7, Stormwater Management conflicts with the information in the Preliminary SWPPP.
58. Reporting to the 1/100 cfs is not realistic given the accuracy of the input data. Table 7-4 page 7-12 in Chapter 7, Stormwater Management is showing negligible increases in peak flow. The engineer may wish to round to the nearest cfs. However, this may require additional mitigation as at Design Point 5, the 25 year storm event pre development peak is 4.44 cfs, rounding to 4 cfs and the post development peak 4.82 cfs rounds to 5 cfs.
59. There does not seem to be a hydraulic summation of Design Points 1A, 1B and 1C and the upstream areas at the culvert under Route 22. This is a critical design point where the peak flows need to be studied.

Appendix G

60. Page 1-2, 1st line. The report is a Condensed Report Format as stated, however this format is only acceptable for small acreage projects, e.g., cell towers and well pads. The consultant should have used the standard format.
61. The consultant did not develop an adequate site sensitivity model. The consultant correlated site sensitivity to prior disturbance, which is exactly what the SHPO says not to do. The discussion should be based on the site types likely to be identified that consider both ecological and cultural factors and their correlation to documented archaeological sites. Variables used to develop this model include: landform, soil type, depositional context, hydrology, geology, and floral and faunal communities. Values for these variables should be compared across the existing site record in order to formulate a



sensitivity model that considers access to resources and transportation routes as well as the suitability of specific landforms for occupation. Based on the results of background research, the project area should stratified into three probability rankings.

62. Page 3-2, 5th paragraph. O'Conner's 1854 map of Putnam County is referenced, however it is not included in the report.
63. Figure 2. The consultant's definition of the APE is inadequate. Segments 2, 3, and 4 are isolated and the means to access those areas should be considered, as well as any infrastructure improvements that may be extended to those areas.
64. The report recommends archaeological testing, but lacks specifics.

Chapter 12

65. See previous discussion regarding the APE.
66. The methodology for the architectural survey is not clear.
67. Page 12-8, *Potential Architectural Resources*. It doesn't appear that an intensive-evaluation of the structures was completed, therefore it is not possible to make determination of non-eligibility.
68. See previous discussion regarding site sensitivity. The report refers to "potentially sensitive"; an adequate model should be developed to qualify sensitivity to low, medium, or high.

Geotechnical

69. We reviewed the report and support documentation prepared by CHA dated 5/23/08. It is preliminary and relates to the buildings and is comprehensive and applicable. The report does not specifically address site improvements as roadwork, cut and fill slopes and pavement subgrades, and stormwater management to include percolation characteristics. The contents of the report, however, would be very useful for the site improvement preliminary design process.

Traffic Review

The following comments have been generated based on our review of the following documents:

Chapter 10: Traffic, Parking, and Public Transportation
Plan Sheets G-001, C-101, C-102, CS101, CS102, CS103, CS104, & CS105

Traffic Report

70. The traffic counts were conducted on Wednesday May 28th and Thursday May 29th 2008. For the year 2008, Memorial Day occurred on Monday May 26th. Generally, traffic conditions are less intense during holiday weeks due to commuters being absent from the roadway while on vacation. Therefore, the base conditions which were collected by the applicant may not represent the typical traffic conditions during non-holiday weeks. The applicant should provide evidence that the manual turning counts were not impacted by the holiday week, or the applicant should recount the study intersections during a non-holiday week and revise the traffic report accordingly.



71. The applicant provides capacity analysis for the AM, PM, Later PM and Saturday Mid-Day peak hours. The applicant should provide data as to the typical operation of the facility on Sunday mornings.
72. To establish the Background Growth portion of the No-Build traffic conditions, the applicant has increased the existing traffic volumes by an annual growth rate of 1.5%. The applicant should provide support for the use of a 1.5% annual growth rate.
73. The applicant has generated or obtained the site generated trips for each of the development located adjacent to, or within the project study area, anticipated to be operational by the build year of 2014. The applicant should specify if the site generated trips for each development were generated as part of this report, or obtained from a traffic report previously conducted. For those site generated trips which were taken from an obtained traffic report, the applicant should include the volume figures from each referenced report within the appendix. Where the site generated trips have been generated by the applicant, a trip distribution figure should be prepared that depicts the distribution of each development.
74. The applicant states that The Institute of Transportation Engineers (ITE) does not provide trip generation rates for the proposed improvements. If this were considered as one large development, this statement would be true; however, the applicant later states that only the residential portion of the development will create an increase in site generated trips. ITE does provide trip generation rates for residential uses. The applicant should utilize the trip generation rates contained within the ITE Trip Generation Manual to determine the site generated trips due to the increase in residential units.
75. The applicant has estimated the increase of site generated trips for the proposed facility by creating trip generation rates based on the manual turning counts conducted at the site driveway during the AM, PM, Late PM, and Saturday Mid-Day peak hours. The trips rates determined by the applicant utilize the number of residents as the independent variable to determine the peak hour trips associated with the increase in residential units. The applicant states the other site improvements (Audio-Video Addition, Maintenance Building, North Office Building and other smaller buildings) will not create an increase in the site generated trips. The applicant should provide substantial evidence to support the claim that the additions (other than the increase in residential units) will not create an increase in site generated trips. It would appear, based on the parking proposed underneath the "North Office Building" and "Maintenance Building," that the applicant anticipates some sort of parking demand for these buildings. Therefore, one could logically anticipate an increase of trips generated by the development due to the additional buildings, in addition to the increase from the residential units.
76. The applicant states the trip distribution of the site generated trips was determined from "information obtained from the applicant on its residents' trip patterns." The applicant should submit this information for review, and explain the methodology for collecting such information.

Circulation

77. The applicant should elaborate as to the anticipated rate of bus arrivals, and the ability of the site to accommodate large numbers of busses arriving coincidentally.
78. The applicant shall submit turning templates to depict a bus successfully navigating the proposed bus parking area.



79. The applicant should specify the anticipated design vehicle for the development, and provide vehicle turning diagrams depicting such vehicle navigating the site.
80. The applicant shall provide data explaining how and where vehicles will turn around after utilizing the over flow parking area depicted on Sheet CS104.
81. The application shall submit a circulation plan for the underground parking areas.

Parking

82. The applicant shall submit calculations showing that the proposed parking supply shall meet the anticipated parking demand for the development.

Capacity Analysis Sheet

83. The applicant has utilized a 30% Right Turn on Red (RTOR) reduction for each signalized intersection within the study area, where such movement exists. The Highway Capacity Manual (HCM), which sets the standard methodology for such reductions, recommends that field counts be conducted to establish the number of right turns which occur during the red phase for each movement at each signalized intersection. Where no such data exists, HCM specifically states that no RTORs should be utilized. The use of a RTOR reduction will have a large impact on the results of the capacity analysis. Therefore, the applicant should provide counts which justify the use of 30% RTOR reduction for each right turn movement at each signalized intersection.
84. The applicant has analyzed the westbound approach for the signalized intersection of Route 22 & Route 68 as a two lane approach, with an 8.5' dedicated right turn lane, and an 8.5' shared left/thru lane. However, based on a review of the existing conditions, the approach is striped as one approach lane for all turning movements. The applicant should provide data to support the use of two lanes rather than one lane permitted all turning movements.
85. The applicant should submit capacity analysis summary sheets that depict the Peak Hour Factor (PHF) utilized for the analysis of each signalized intersection. It is noted that the "Short Report" contained within the Highway Capacity Software Plus (The software utilized by the applicant for capacity analysis) provides such data, and could be included for each signalized intersection.

Plan Review

86. Our general review of the site plan is that safe pedestrian circulation is lacking between the proposed parking/bus area, and the main portion of the site. To address such, the applicant should revise or submit additional plans depicting the following per the Manual of Uniform Traffic Control Devices (MUTCD) and local requirements; crosswalks with appropriate signage, stop bars, sidewalks to/from the proposed overflow parking area, speed limit signs and stop signs.

Review of Economic Analysis

87. The economic analysis prepared for the Watchtower Education Center (WEC) is a thorough analysis that addresses the requirements of the DEIS scoping document. The



analysis used the Regional Input-Output Modeling System (RIMS II) developed by the U.S. Department of Commerce to project regional economic impacts as well as a traditional analysis of tax payments to local jurisdictions in comparison to the services required from the Town, County and local school district. Of note is the fact that the WEC is exempt from federal, state and local taxes due to the applicant's status as a tax exempt organization. This is especially significant given the assessed value of Watchtower holdings was \$177,181,900 in 2008.

88. Despite the tax exempt status Watchtower does voluntarily pay taxes on the Patterson Inn which provides lodging for visitors and guests. The Patterson Inn had an assessed value of \$14,850,300 in 2008 (approximately 8% of total Watchtower holdings) and \$344,563 of tax payments were made to the various taxing jurisdictions (see table following). Another Watchtower holding, Valley Farms Corporation, also voluntarily pays taxes but those tax payments only amounted to a combined total of \$414.93 for all taxing jurisdictions in 2008.

Patterson Inn – 2008 Tax Payments

Taxing Jurisdiction	Taxes Paid
Putnam County	\$ 30,413
Town of Patterson	\$ 46,429
Patterson Library	\$ 4,180
Patterson Fire District No. 1	\$ 10,942
Park District	\$ 1,301
Carmel Central School District	\$251,298
Total	\$344,563
Sources: Applicant's Economic Analysis and Town of Patterson Tax Receiver's Office, 2008 County and Town Tax Bill, and 2008-2009 Carmel Central School District Tax Bill.	

89. Although Watchtower contributed only a modest sum in tax payments given the size and assessed value of the holdings, this is tempered by the fact that very little is required in the way of services from the Town of Patterson, Putnam County and Carmel Central School District. WEC properties are provided with 24 hour private security. An on-site infirmary with two full-time physicians and 16 registered nurses and on-site ambulance is provided and there are 14 emergency medical technicians (EMT's) on site. Recreational facilities are provided on site as are library facilities. There are no school-aged children residing at the WEC so there is no demand on the Carmel Central School District. Refuse is handled by a private contractor under contract to WEC. The only demands placed on local services are limited to medical services for WEC residents with more serious medical conditions who must be treated at area hospitals, and fire protection and police protection services. Fire protection services are provided by the Patterson Fire District and police protection is provided by the County Sheriff and New York State Police.
90. The economic analysis includes the secondary or induced impacts flowing from the construction of the WEC project. This analysis is performed using the RIMS II regional input-output model. A primary input to the model is the number of construction jobs and the salaries associated with those jobs. It is projected that 166 new construction jobs would be created during the four year construction period (664 person years for the combined four years). This total number is apparently used as input to the model.



Re: Watchtower
MC Project YPP021

November 5, 2009
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However, it is stated in the economic analysis that it is anticipated the 75 percent of the construction labor demand would be met through volunteers. If this is the case then the regional economic impact is overstated since the volunteers would not be drawing the additional or new salary that was input to the model.



**PUTNAM COUNTY
OFFICE OF THE SHERIFF
AND
CORRECTIONAL FACILITY
THREE COUNTY CENTER
CARMEL, NEW YORK 10512**



DONALD B. SMITH
Brigadier General, U.S. Army (Ret.)
SHERIFF

TELEPHONE
(845) 225 - 4300

PETER H. CONVERY
UNDERSHERIFF

October 2, 2008

Mr. Steven Gates
AKRF
Environmental and Planning Consultants
34 South Broadway – Suite 314
White Plains, NY 10601

RE: PROPOSED WATCHTOWER SITE EXPANSION IN PATTERSON, NY

Dear Mr. Gates:

In response to your letter dated September 22, 2008, the Putnam County Sheriff's Department, along with the New York State Police, provides police services to the Town of Patterson including the Proposed Watchtower Expansion.

The Sheriff's Department has a minimum of one patrol assigned to a sector that includes the Town of Patterson 24 hours a day. The Sheriff's Department answers all 911 emergency calls within the Town of Patterson. Additional assistance, if required, is provided by the New York State Police.

The Putnam County Sheriff's Department has 83 full time law enforcement officers. The service ratio is one deputy to 1,200 persons for the County of Putnam, for the Sheriff's Department alone. Our headquarters is located at Three County Center, Carmel, New York.

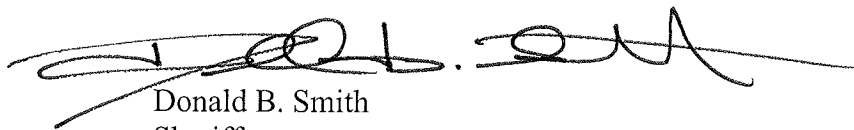
The approximate response time of responding units is anywhere from 5 minutes to 20 minutes depending on the location of the patrol unit in relation to the call for service. We do not anticipate a great impact to the Putnam County Sheriff's Department in providing police protection to the future residents of the Watchtower Site Expansion Project.

Ms. Denker
September 5, 2008
Page 2

However, with Putnam County being one of the fastest growing counties in New York State, the collective impact of many new developments on law enforcement would most certainly require more law enforcement resources in future years. If you need information pertaining to the New York State Police and your development's impact on their agency, please contact the Brewster Barracks via telephone at (845) 279-6161, or by mail at Route, 22, Brewster, NY 10509.

I hope the above information is helpful to your project. Should you need any additional information, please do not hesitate to contact me or Captain Gary T. Hosmer, who heads our Road Patrol Division, at (845) 225-4300, Ext. 226.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald B. Smith". The signature is stylized with a large, sweeping initial "D" and a long horizontal line extending to the right.

Donald B. Smith
Sheriff

DBS/chh


WATCHTOWER
Bible and Tract Society of New York, Inc.
25 Columbia Heights, Brooklyn, NY 11201-2483, U.S.A.
Phone: (718) 560-5000 Fax: (718) 560-7446

November 12, 2007

Shawn Rogan, Chairman and Board Members
Town Planning Board
c/o Richard Williams, Town Planner
Patterson Town Hall
1142 Route 311 / Box 470
Patterson, New York 12563
e-mail: planning@pattersonny.org

Re: Application for Offices, Support Space, and Residences for an Additional 500 Occupants

Dear Mr. Rogan and Members of the Board:

We met with your board last in 2002 in regard to proposed expansion of the Watchtower Educational Center. At that time, as part of the SEQRA process, the scoping outline was finalized for a Draft Environmental Impact Statement (DEIS). During the past year, Watchtower has reviewed its current needs for the Watchtower Educational Center. This has resulted in the determination that the expansion at Patterson by 500, as proposed in 2002, is still what is needed for this location.

We are now in position to move ahead with the environmental impact studies needed to complete the DEIS, which will include engaging consultants for several of the studies. Before moving ahead with this process, we would like to meet with the Planning Board to determine if there are any minor adjustments required for the scoping outline that is the basis for the DEIS.

In order to discuss these matters, we therefore make request to meet at your regular meeting of December 6, 2007. If there are any questions on these matters, please contact Richard Eldred or Kent Fischer at (845) 306-1000.

Sincerely,


OF NEW YORK, INC.



Max Larson, President

