

Town of Clarkstown

Comprehensive Plan Update

**FOCUSED
ON THE
FUTURE**



2021

**TOWN OF CLARKSTOWN
2021 COMPREHENSIVE PLAN UPDATE:
FOCUSED ON THE FUTURE
FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT
(FGEIS)**

Proposed Action: Adoption of the 2021 Comprehensive Plan Update

TOWN OF CLARKSTOWN, ROCKLAND COUNTY, NEW YORK



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Comprehensive Plan Update Adoption: September 14, 2021

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Clarkstown Town Board

INTERESTED AGENCIES

Clarkstown Architectural Historic Review Board
Clarkstown Building Department
Clarkstown Department of Engineering and Facilities Management
Clarkstown Highway Department
Clarkstown Planning Board
Clarkstown Police Department
Clarkstown Town Attorney
Clarkstown Town Clerk
Clarkstown Zoning Board of Appeals

Rockland Lake Fire District
Nanuet Fire District
Valley Cottage Fire District
Central Nyack Fire District
Congers Fire District
Hillcrest Fire District
New City Fire District
East Spring Valley Fire District
West Nyack Fire District
Nyack Joint Fire District

Congers/Valley Cottage Volunteer Ambulance Corps
Nanuet Community Ambulance Corps
New City Volunteer Ambulance Corps. and Rescue Squad
Nyack Community Ambulance Corps
Spring Hill Ambulance Corps

Clarkstown Central School District
East Ramapo Central School District
Nanuet Union Free School District
Nyack Union Free School District

Nanuet Public Library
New City Library
West Nyack Free Library
Valley Cottage Library

Town of Haverstraw Town Board
Town of Orangetown Town Board
Town of Ramapo Town Board
Village of Chestnut Ridge Village Board
Village of Haverstraw Village Board
Village of New Square Village Board
Village of Nyack Village Board
Village of South Nyack Village Board
Village of Spring Valley Village Board
Village of Upper Nyack Village Board

Rockland County Department of Economic Development and Tourism
Rockland County Department of General Services
Rockland County Department of Health
Rockland County Department of Highways
Rockland County Department of Planning
Rockland County Department of Public Transportation
Rockland County Department of Economic Development and Tourism
Rockland County Division of Environmental Resources
Rockland County Drainage Agency
Rockland County Executive
Rockland County Office of Fire and Emergency Services
Rockland County Legislature
Rockland County Planning Board
Rockland County Sewer District #1

New York State Department of Environmental Conservation, Region 3
New York State Department of Transportation, Region 8
New York State Thruway Authority

Palisades Interstate Park Commission
Federal Emergency Management Agency
U.S. Army Corps of Engineers
Orange & Rockland Utilities, Inc.
Suez Water



**In Memory of
Shirley J. Thormann
1932-2020**

This update to the Comprehensive Plan is dedicated in memory of Shirley J. Thormann who served the Town of Clarkstown as a member of the Planning Board from the early 1970's to 1983, and then again from 2004-2018. She was Chairwoman of the Planning Board from 2005-2016. Under her leadership, Clarkstown received the Pace University Land Use Law Center Founders Award in 2011 and the New York State Planning Federation Comprehensive Plan Award in 2012 for the 2009 Clarkstown Comprehensive Plan. Shirley also served as Chairwoman of the Town's Citizen's Advisory Board on Housing, as an ardent advocate for affordable housing for seniors as well as those with special needs.

Shirley started teaching at PS 59 in the Bronx followed by White Plains High School. From the late 1960's to 1987, she found her home teaching American History at Convent of the Sacred Heart Prep School, Greenwich, CT. Shirley advanced in her career to become the head of the Upper School, and subsequently served on the school's Board of Trustees from 2004-2005.

Not only did Shirley excel in the education field, she was a tireless public servant and civic minded individual. She held many titles, including Civic Association President, Cub Scout Den Mother, Altar and Rosary Society at St. Paul's Church, CCD Teacher, Ladies Auxiliary at Nyack Hospital, Meals on Wheels volunteer, Grace Episcopal Thrift Shop volunteer, Birchbrook Day Camp Director, Trustee of the Valley Cottage Library Board and as a Board member for the Hi-Tor Animal Shelter and Pipers Dream Animal Rescue.

This update builds upon the award winning Comprehensive Plan that Shirley helped to create for Clarkstown in 2009. We miss her and her spirited dedication to the Town.



**In Dedication to
Rudolph J. Yacyshyn**

This update to the Comprehensive Plan is dedicated to Rudolph J. Yacyshyn who served on the Clarkstown Planning Board from 1966 to 2021, including 25 years as Vice Chairman and 18 years as Chairman.

Mr. Yacyshyn holds a Bachelor of Science Degree from the New York University School of Business and a Master of Urban Planning Degree from the New York University Graduate School of Public Administration, where he was also a PhD candidate in Urban Planning.

From 1993 to 1996 he was appointed by the Rockland County Executive and Legislature to serve as Chairman and member of the Rockland County Planning Board, and under his leadership and because of his efforts the Town of Clarkstown Planning Board became the first Planning Board in New York State to receive authority over site plan approval.

He is the founder and First President Emeritus of the Rockland Municipal Planning Federation. Mr. Yacyshyn has moderated and lectured certification courses since 1993 and is a recipient of the 1993 Rockland Municipal Planning Federation Distinguished Service Award. He is also a member of and has served as the Mid-Lower Hudson Regional Director of the New York Planning Federation and in 2010 was the recipient of the Federation's Heissenbuttel Award for Planning Excellence. Mr. Yacyshyn is also a member of and has served as the Lower Hudson Regional Director of the American Planning Association's Metro New York Chapter.

Mr. Yacyshyn has played a key role in the composition of four Town Comprehensive Plans and numerous subsequent updates. As Chairman of the Town of Clarkstown Comprehensive Plan Special Board he oversaw the conception, creation and adoption of the Town's 2009 Comprehensive Plan, which received Pace University's Land Use Law Center Founders Award in 2011 and the New York State Planning Federation's Comprehensive Plan Award in 2012.

Mr. Yacyshyn's dedication to the field of Planning cannot be understated. His service on the Planning Board for 55 years has guided Clarkstown through its most transformative decades and serves as a lasting testament to his commitment and leadership.

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I - Executive Summary

INTRODUCTION

The 2009 Town of Clarkstown Comprehensive Plan was truly unique. Beyond simply updating the previous Comprehensive Plans of 1999 and 1966, the Comprehensive Plan examined the past, present and potential future conditions of the Town and worked to serve as a reference and guide for land use decisions. In addition to analyzing numerous studies, private consulting firms provided updated technical research and data. Additional data was collected from several surveys given to area high school juniors and seniors, as well as phone surveys of the general populace. An important component of the 2009 Plan was the collection of digital geographic information which was used to analyze land use and develop maps. In a truly grass-roots effort, subcommittees comprised of Town staff and citizens collaboratively developed the goals and objectives of the Plan.

This 2021 updated version of the Plan is similarly comprised of information gathered from a range of sources. Clarkstown's residents were invited to attend workshops to provide comments, and a new website was established to collect public input and to provide information on the Comprehensive Plan Update process.

Not only were comments collected by phone, mail and email, but also within a geographic context via the website's seven thematic maps, which allowed for more targeted and specific analysis of the comments received.



May 15, 2008 Public Meeting

VISION STATEMENT

Aptly titled "Focused on the Future," this updated Comprehensive Plan works to address the evolving needs of the Town which have arisen since the original Plan was published in 2009. In the twelve years that have passed since the adoption of the 2009 Comprehensive Plan the demands upon our Town's most precious commodity, its land, have shifted in dramatic fashion. Large state and regional projects, such as the Governor Mario M. Cuomo Bridge and the Lower Hudson Transit Link, have been completed, and increased emphasis has been placed on redevelopment, transit options, and compact growth. Environmental concerns continue to shape building and zoning policy, and new, innovative technologies are progressing and allowing for development which produces less of an impact on the natural environment. In working to protect the natural environment, the Town must also understand what future environmental challenges it may face, and adopt policies to ensure resiliency. Looking toward the future, it is clear that the Town will need to re-examine what has already been built when looking for areas to host new development. As behaviors and systems change, the existing pattern of land use must also adapt to accommodate these changes in the most responsible ways possible. It is the vision and intent of this updated Comprehensive Plan to guide Clarkstown into the future so that this community may continue to be one which promotes health, safety and opportunity for all residents, current and forthcoming.

GOALS & OBJECTIVES

The goals and objectives of the Comprehensive Plan are organized around eight interconnected central topics. The Comprehensive Plan Update re-examined and updated the goals and objectives of the 2009 Plan, and produced the following:

An overview of the changes to the 2009 Comprehensive Plan can be found in Section III of the Appendix of this Plan.

Economic Development

- Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses
- Construct a database of information about the Town's commercial sector
- Enhance communication between the Town and the business community
- Continue the Office of Intergovernmental Relations/Economic Development to attract new businesses and to assist business already established within the community
- Work to ensure that a variety of housing options exists within the Town
- Create connections between the commercial sector and educational institutions
- Implement new programs and continue those already in place that beautify the Town, making it an attractive place in which to live and conduct business
- Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces
- Work to ensure the Town's Zoning Code can accommodate new and upcoming commercial and industrial uses
- Consider the implementation of a transfer of development rights program

Environmental Resources

- Protect Clarkstown's ridgelines
- Continue the acquisition of open space lands to protect sensitive environmental areas, as well as farmland
- Continue enforcement of sediment and erosion control measures, both during and after construction
- Protect and conserve both the sources and supply of potable water and the natural features which add to water quality
- Continue to enact limits on total development coverage for all zoning districts
- Continue to require stormwater management to a higher extent than currently applicable where development is proposed in watersheds which experience flooding
- Establish stream protection corridors
- Enact a wetland protection ordinance (subject to the procedures required by State Law)
- Lobby for air quality monitoring in the Town and County



Shoreline of Lake DeForest

- Continue to coordinate with the New York State Department of Environmental Conservation regarding air emissions within the Town
- Continue to require more detailed flora and fauna surveys during reviews of development proposals on properties which might contain species of concern, both those at risk and invasive
- Continue the acquisition of open space to preserve natural habitats
- Protect wooded and natural areas from the removal of vegetation or other native materials which add to the character of the area
- Preserve the suburban and remaining semi-rural character of the Town
- Implement design standards for future construction
- Designate Critical Environmental Areas in Clarkstown
- Continue the investigation of and action against complaints of noise, dust, odor and light pollution
- Continue to assess the potential for noise, dust, odors and light pollution in projects under review; require the elimination or mitigation of these pollutants as a condition of approval
- Manage and remove invasive flora species, both terrestrial and aquatic

Health Safety & Welfare

- Ensure the efficient provision of emergency services
- Create a mechanism for providing tax relief to volunteer emergency service personnel
- Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced
- Continue to develop zoning and building regulations that reduce and eliminate potential drainage or flooding problems resulting from new construction
- Develop zoning and building regulations, and implement roadway changes that reduce or restrict odors, sounds, light pollution, commercial traffic and other negative environmental impacts on residential areas



Valley Cottage Engine Company No. 1

Historic & Cultural Resources

- Identify and maintain an up-to-date inventory of historic resources
- Expand upon legislation to ensure that historic roadways, and those historic properties in private hands are not destroyed, or so renovated by subsequent owners as to lose their historic status
- Establish a mechanism which notifies the Architectural Historic Review Board when development is proposed on historic properties and roadways
- Establish a plan to improve the maintenance of all publicly owned historic properties and abandoned cemeteries within the Town

- Communicate, promote and educate Clarkstown residents of the historic and cultural resources within the Town

Housing

- Permit apartments over businesses
- Create an inventory of existing residentially zoned institutional properties and consider obtaining the right of first refusal for any property that may become available for future residential development
- Adopt zoning that requires a set aside of new units for workforce and volunteer housing
- Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care
- Create zoning to encourage income adjusted housing for emergency service volunteers
- Expand initiatives to safeguard neighborhoods from inappropriately scaled development

Recreation, Parks & Open Space

- Replace the existing soccer field at Zukor Park
- Construct a comfort station at King's Park
- Construct a multi-use, domed sport and recreational facility
- Develop walking trails at Davenport Preserve
- Provide intra- and inter-Town trails
- Continue the acquisition of open space lands following the amended Town of Clarkstown Open Space guidelines
- Construct pickle ball courts at Town parks and recreational facilities
- Continue to upgrade the equipment and infrastructure at Town park and recreational facilities to maximize the safety and benefit of residents
- Continue the provision of a variety of senior citizen recreational facilities and senior citizen programs
- Construct a fixed performance area for Town concerts and events

Transportation

- Provide efficient travel between the Governor Mario M. Cuomo Bridge/I-287 corridor, Route 59 corridor, and other parts of Clarkstown
- Add to economic strength and quality of life in Clarkstown by encouraging, and coordinating with, regional transportation initiatives and studies
- Continue to implement a Complete Streets Program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes
- Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors
- Provide for commuter transit services that are accessible, efficient and safe
- Create a walking environment that is accessible, safe, and enjoyable
- Create a cycling environment that is accessible, safe, and enjoyable

- Improve residents' health by reducing air, noise and light pollution related to motorized travel
- Develop Hamlet Centers with transportation options and connections
- Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation

Sustainability and Resiliency

- Create a Town Committee on Sustainability and Resiliency
- Develop programs to reduce greenhouse gas (GHG) emissions
- Develop programs to educate Clarkstown residents on issues of sustainability and resiliency
- Develop Programs to increase the Town's resiliency to the effects of climate change

IMPLEMENTATION

The goals and objectives of the Comprehensive Plan will be implemented by a variety of methods, ranging from simply sharing information to developing entirely new zoning districts for specific areas of the Town.

Policy Changes will be made to implement many of the Comprehensive Plan goals and objectives by instituting new processes and procedures or changing existing ones already employed by various Departments of Town government.

Critical Environmental Area Designation of sensitive landscapes will provide these lands with greater environmental protections under New York State Law.

Infrastructure Improvements will be primarily needed to the Town's transportation network. The Comprehensive Transportation Plan identified over 100 discrete transportation projects in the areas of access management, signal coordination, accident reduction, public transit, sidewalks and bicycle paths.

Town Official Map Changes will illustrate necessary improvements to the Town's transportation and drainage systems along with the reservation of property for parkland. The official map will show areas that applicants for development will be required to set aside as open space or improve with transportation infrastructure such as sidewalks.

Inter-Municipal Agreements with County, regional, state and national government agencies will be needed to implement changes that affect geographic areas outside of the Town's municipal borders, require permits from multiple levels of government or are too costly to be borne by the Town alone.

Zoning Text Amendments will be needed to change the requirements or procedures for development in entire zoning districts or the Town as a whole. Protection of environmentally sensitive features which cross multiple properties and zoning districts will require zoning text amendments.

Land Use Changes are called for within the Towns Regional Shopping (RS) and Major Regional Shopping (MRS) zoning districts, as well as within the Town's Hamlet Centers. New zoning will be developed for these areas that integrates transportation improvements, commercial activity and residential development, as well as encourages growth that is environmentally, socially and culturally sustainable in the long term.

Records and Asset Management and Information System implementation will improve Clarkstown's ability to serve the public, lower long-term maintenance costs, and protect public safety by improving and expanding the Town's digital database and better linking its functionality to the Town's GIS systems. A mapping tool for viewing the data provided in the figures within this Plan, accessed through the Town's website, is also planned for development.

ENVIRONMENTAL IMPACT ANALYSIS

Like the 2009 Comprehensive Plan, this updated version follows the format of a Generic Environmental Impact Statement under the provisions of the New York State Environmental Quality Review Act, and analyzes the full range of potential adverse environmental impacts associated with its goals and objectives. Mitigating actions are proposed for the potential impacts of each goal and objective to lessen or eliminate these impacts. The Comprehensive Plan Update also examines the potential environmental impacts of not adopting the Update or, in the alternative, adopting the goals and objectives of the Comprehensive Plan independently of one another.



High Tor Mountain

CONCLUSION

This updated Comprehensive Plan, like the original, is the embodiment of the hard work and collaboration of a number of individuals. Extensive public participation, numerous studies and countless hours of deliberation resulted in a document which examines the Town through many different lenses. This multi-faceted approach to comprehensive planning ensures that this document is as representative of the Town as it possibly can be. The Comprehensive Plan strives to guide the Town of Clarkstown toward the brightest future possible, and the great efforts that have gone into the Plan are evidence of the commitment of Clarkstown to continue being a great place in which to live, work, and enjoy.

II – Background

a) History of Clarkstown’s Comprehensive (Master) Planning

In 1966 the Town of Clarkstown developed its first Master Plan which served the Town for three decades. It was financed through a Federal grant from the Urban Planning Assistance Program authorized by Section 701 of the Housing Act of 1954. It was also financed in part by the State of New York and the Town of Clarkstown. The Plan was authorized and supported by the Town Board, and its preparation was delegated to the Town Planning Board in 1964. The Planning Board engaged and utilized the services of the Rockland County Planning Board’s senior staff and its planning consultant, as well as Clarkstown’s own Town Planner. This endeavor on the part of Clarkstown was deemed unique at that time among the municipalities in Rockland County and set a pattern for other master plans to be developed.

After an intense effort for two and a half years by the Planning Board and its supporting staff, consultants, public agencies, the Town Board and a thoroughly involved citizenry, the studies entitled “Town Development Plan” were completed and adopted by the Planning Board and transmitted to the Town Board in August 1966. The Town Board deemed the Plan to be the basis for the amendment of the Town’s Zoning Ordinance and Map by the Planning Board and its staff. The Zoning Ordinance and Map were duly amended and submitted to the Town Board, where, after public input and review, it was adopted in June 1967. The Planning Board then proposed and participated in the initial Hamlet Center redevelopment design program that was undertaken for Valley Cottage. The Planning Board also proposed five year intervals for reviews and updates to the Development Plan, which only occurred in 1971. Thereafter, the Planning Board focused its efforts into ongoing master planning, recommending changes as needed.

With the enactment of legislation in the 1990’s that re-codified planning and along “comprehensive” lines throughout New York State, the Town Board authorized the preparation of an update to the 1966 Development Plan. This time, the Planning Board augmented its effort with the services of an Ad-Hoc Committee composed of knowledgeable and committed citizens. It also engaged a planning consultant for the technical aspects of a truly “Comprehensive Plan” that would utilize the elements mandated by state statute. This update called for zone changes of environmentally sensitive properties to the Conservation Zoning District known as R-160. It was, however, not entirely focused on zoning, but also recommended studying various issues facing the Town in the new century such as diminishing open space, increasing housing costs and decreasing affordable housing supply as well as protecting wetlands and revitalizing all hamlet centers. Upon completion and adoption of the plan by the Planning Board and Ad-Hoc Committee in June 1999 and the subsequent completion of the required State Environmental Quality Review Act (SEQRA) process, this Comprehensive Plan Update was submitted to the Town Board for its consideration. The Town Board, after due diligence and review, adopted the Plan in September 1999. Regrettably, some of the most significant goals and objectives were not implemented. However, ensuing studies were undertaken and selected actions accomplished in the succeeding years.

Over 40 years after the first Town of Clarkstown Master Plan was prepared, an entirely new Comprehensive Plan was adopted in 2009 to continue guiding land use within the Town. Titled “Partnerships and Connections,” this plan has served the Town for twelve years. During that time, the Special Board, which guided the development of this plan, was kept intact to oversee the plan’s implementation. By meeting regularly to review, revise and create amendments to the Town’s municipal and zoning code, a number of the goals and objectives of the plan have since been implemented. Now, as the new challenges and opportunities have arisen throughout the past twelve years, the Comprehensive Plan has undergone an extensive update. This updated Plan offers new insight and updated goals and objectives as it strives to continue to serve as the Town’s guide into the future.

b) Studies, research & analysis performed

A Comprehensive Plan was deemed necessary and appropriate in 2007 by the Town Board on the recommendation of the Planning Board. The Town Board passed a resolution in November 2007, as per Town Law Section 272-a, establishing the Comprehensive Plan Special Board which started its work in 2008. The Comprehensive Plan Special Board made use of the data from several studies that were commissioned, along with the research of numerous committees that were formed, to address the issues highlighted in the 1999 Comprehensive Plan. The Citizens Advisory Board for Housing in the Town of Clarkstown had been established in 2001 and had issued a report in September of 2002 calling for the development of affordable housing for seniors and young adults, as well as emergency service volunteers. In 2001, the Open Space Committee developed recommendations for acquiring open space throughout the Town. In 2003 Hamlet Revitalization Overlay Districts were established for Congers and Valley Cottage. The Drainage Task Force was formed to address flooding problems through improvements to the Town’s infrastructure, as well as legislation to prevent future drainage problems. Behan Planning Associates was hired at the beginning of 2006 to develop a Vision Plan for New City. The Town of Clarkstown Economic Development Committee was formed in 2006, and in 2007 retained the services of Saratoga Associates to prepare the Town of Clarkstown Economic Development Strategy, which was completed in 2008. In 2008, C.T. Male Associates was retained to develop the Recreation and Parks Master Plan which provided information and recommendations for the Town’s recreational facilities and parks systems. The Comprehensive Plan incorporates the findings of these studies and committees, as well as those commissioned principally for the Comprehensive Plan which include the Clarkstown Comprehensive Transportation Study prepared by Cambridge Systematics, Inc. with The RBA Group and Howard/Stein-Hudson Associates, and the Town of Clarkstown Environmental Resource Assessment prepared by John Mickelson, Ecological and Geospatial Consultant.

The Special Board also had at its disposal studies dating back to the original Town Master Plan, including but not limited to:

- a) Development Plan, Town of Clarkstown, August 1966
- b) Development Plan Update, Town of Clarkstown 1971
- c) Clarkstown Drainage Master Plan, 1972
- d) Route 304 Land Use & Zoning Study, July 1975

- e) Palisades Interstate Parkway Corridor Management Plan, December 1999
- f) Clarkstown Comprehensive Plan Update, 1999
- g) County of Rockland Open Space Guidelines, October 1999
- h) Mid-Hudson South Region Bicycle & Pedestrian Master Plan, June 2001
- i) Priority Recommendations of the Clarkstown Open Space Citizen's Advisory Committee, June 22, 2001
- j) New York-New Jersey Highlands Regional Study: 2002 Update
- k) Citizens Advisory Board for Housing in the Town of Clarkstown Final Report, September 2002
- l) Assessment of Existing Parkland, State Recommended Parkland Standards and Fee for Money in Lieu of Land, April 11, 2005
- m) Rockland County Signal Optimization Study, 2007
- n) New City Vision Plan, February 2007
- o) Davenport Preserve Master Plan update, January 2009

For the Comprehensive Plan Update a number of new studies and reports were available as resources, including but not limited to:

- a) Rockland Tomorrow: Rockland County Comprehensive Plan, 2011
- b) Partnerships & Connections: Town of Clarkstown Commercial Corridor Transportation & Land Use Study, 2015
- c) NY Rising Community Reconstruction Plan, 2014
- d) Complete Streets Committee Project Selection and Implementation Guide, 2017
- e) Hamlet of Nanuet Transit Oriented Development Plan – Final Report, 2017
- f) Clarkstown Geographic Information Systems Strategic Plan 2020-2025, 2020
- g) Clarkstown Business & Economic Development Advisory Committee Report, 2019
- h) Clarkstown Climate Action Plan, 2021
- i) Covid-19 and NYC Metro Region Residential Sales Trends, 2021
- j) EASI Professional Complete Report, Clarkstown, NY (Demographics Analysis), 2021

Despite the myriad of studies completed, it is the goal once again that this Comprehensive Plan Update not be simply a compilation of studies or a document that “sits on a shelf.” To this end, the Special Board worked to develop a Geographic Information System (GIS) that embodies and promotes the goals and objectives of the Plan. The County of Rockland Planning Department's GIS Division provided the Town with numerous data sources. The Town built upon this data and developed new layers of information. Additional data was available from various government agencies (NYS, USGS, US Army Corps of Engineers, NASA, etc.), as well as private companies and universities. These data layers were integrated and compiled by the Town's GIS Coordinator to provide the most up-to-date environmental, historic and cultural information on the properties located within the Town.

As development proposals come forward, this data will continue to be readily available to the Town's land development professionals to inform the environmental review and planning processes. Further development of Clarkstown's GIS will continue to help verify information on Environmental Assessment Forms (EAF) provided to the Town with land development

applications under SEQRA. The GIS will make clear when additional studies are necessary, which, in turn, can be used to update the Town's Geographic Information System. The GIS will continue to be used to run development scenarios to determine potential future impacts, thereby guiding long range planning of the Town. The geographical representations created by a GIS will continue to help engage and educate the public.

c) Subcommittees of the Special Board

To coherently organize the 2009 Comprehensive Plan and effectively process the vast amounts of information received from the public participation process and consultant studies, it was necessary to create subcommittees of the Comprehensive Plan Special Board. As such, the Comprehensive Plan was structured around the following seven themes:

- Economic Development
- Environmental Resources
- Health, Safety & Welfare
- Historic & Cultural Resources
- Housing
- Recreation, Parks & Open Space
- Transportation

The seven subcommittees of the Special Board each focused on one of these themes. Subcommittee size ranged from 4 to 15 members; each group had one or two members designated as the chairperson or co-chairpersons. Subcommittee members were selected based on their knowledge and experience and included Town staff and citizens.

The Comprehensive Plan subcommittee members were also responsible for serving as facilitators during the public meetings and recording and categorizing comments from the public. Each subcommittee was responsible for conducting its own research into the existing conditions in the Town related to its respective topics. Some subcommittees conducted all of their own research internally, while others commissioned consultant studies or surveys. The subcommittees developed and proposed recommendations for the Comprehensive Plan based on the comments received during public meetings and information in the consultant reports and surveys. Recommendations were placed into "matrices" and were compared and analyzed for potential environmental impacts and suggested mitigation. The completed matrices were then used to create each subcommittee's report of existing conditions and proposed recommendations to the Special Board. These reports were used by the Special Board to develop the final goals and objectives of the Comprehensive Plan.

The Special Board was also tasked with managing the development of the Comprehensive Plan update. The Special Board continued to meet following the adoption of the Comprehensive Plan in order to implement the Plan's goals and objectives and review land use changes for compatibility with the Plan. Creating a clear picture of what had been accomplished toward meeting each of the goals and objectives of the Comprehensive Plan was fundamental to developing the Comprehensive Plan Update. Following a thorough review of policies, programs, purchases and legislation enacted since the adoption of the Comprehensive Plan in 2009, the

Special Board developed a “Summary of Progress” (see Appendix Section I.) which clearly illustrated the work done thus far on each of the Plan’s Goals and Objectives. As the Comprehensive Plan Update was a revision of the existing Plan, subcommittees were not created, and instead the Board invited various Town department heads and officials to its meetings to review each existing chapter of the Plan. This collaboration, combined with the public participation process resulted in the proposed changes that would embody the Comprehensive Plan Update. The Special Board will remain constituted after the adoption of the Comprehensive Plan update to continue working on the implementation of the goals and objectives of the Plan.

d) Public participation process

Engaging and educating the public was an integral part of the Comprehensive Planning process. The Planning Department, in conjunction with the Special Board for the Comprehensive Plan, organized the public participation process of the 2009 Comprehensive Plan. Every household in



Comprehensive Plan Kick-Off Meeting

the Town received at least three invitations to participate in the process. Over six hundred residents from throughout the Town participated in two Town-Wide workshops and five Hamlet workshops identifying the issues they wanted addressed in the Comprehensive Plan. In addition, a special meeting was held to gather input from members of Clarkstown’s religious and cultural institutions. Comments were recorded, posted on the Town website and analyzed by each subcommittee. The Comprehensive Plan was presented to the public based on the seven themes upon which the subcommittees were

structured. Workshops focused on these themes were conducted at each hamlet center and with various stakeholder groups, with the aid of geographical representations and analyses. After the Draft Comprehensive Plan and DGEIS were deemed complete by the Town Board on August 25, 2009, a public hearing was held on September 22, 2009 to collect comments. Various media were used to inform the public of the process, such as the postcards, newspaper announcements, mailed questionnaires and web alerts.

Tax-payers, businesses and organized civic groups all have a stake in the Comprehensive Plan and were all called to the comprehensive planning process. The Special Board also engaged the public school districts that serve the Town to specifically include students in the development of this Comprehensive Plan. The Clarkstown Comprehensive Plan reached out to the community’s youth by conducting an extensive school survey. Over 1,300 surveys were completed by juniors and seniors from Clarkstown North and South High Schools, Nanuet High School, Nyack High School and The Rockland Country Day School. The survey collected information on a variety of issues, including housing, environmental issues, park use and volunteer emergency services. Six hundred residents also participated in a telephone survey on housing issues. In addition, as part of the Economic Development Strategy, Saratoga Associates mailed business surveys and conducted interviews of a mix of small businesses, microenterprises, mid-sized businesses, as

well as larger firms that were headquartered within or outside the Town. All of this information was tabulated, analyzed by each subcommittee and incorporated into the Comprehensive Plan.

Using various methods of outreach, an unprecedented number of individuals participated in the development of the Comprehensive Plan Update. The public participation process for the Comprehensive Plan Update began with a Town-wide mailing in May of 2020 to inform residents of upcoming meetings. Due to the ongoing Covid-19 pandemic, public meetings were held via a combined teleconference/webinar. Four of these sessions were held throughout June 2020, with an emphasis on each of one of the Town's four wards at each individual session.

Table 1
Public Outreach Meetings and Participation

Meeting Date	Teleconference Participants*	Facebook Views
June 4, 2020	543	1,996
June 11, 2020	561	2,704
June 15, 2020	1,203	2,650
June 22, 2020	391	2,304
December 9, 2020	1,998	1,919

*Participants are those who remained longer than one minute in the teleconference

Website Participation	
Total Visits	1,671
General Written Comments	53
Map Pinned Comments	107

Comments were collected from callers during these meetings as well as from residents who posted comments on the Town's Facebook page. Participants were also encouraged to submit comments through the Town's Comprehensive Plan Update website, which allowed for both standard written comments and geographically targeted comments pinned to six interactive digital maps (see Table 1). To aid in facilitating input, a "Summary of Progress" document (see Appendix Section I.) was prepared and posted on the website, which allowed the public to view the progress made on each goal and objective of the Comprehensive Plan since its adoption in 2009. In addition, residents also sent emails to the Town via compplan2020@clarkstown.org or planning@clarkstown.org, mailed letters or called the Planning Office. Over 100 emails, letters and calls were received. An additional Town-wide mailing was issued in November of 2020 to notify residents of a final teleconference/webinar in December, at which the initial draft changes to the goals and objectives of the Comprehensive Plan based on the comments received were presented in a PowerPoint presentation (see Appendix Section III.). Following this meeting,

public comments were accepted until the end of 2020. Ultimately, over 700 comments were collected throughout the process and categorized in an extensive database.

e) State Environmental Quality Review Act

The Comprehensive Plan provides specific policies for the growth and development of the Town that recognizes that we “are stewards of the air, water, land and living resources, and that [we] have an obligation to protect the environment for the use and enjoyment of this and all future generations” (6 NYCRR Part 617.1 (b)). This Comprehensive Plan is unique inasmuch as it follows the format of an Environmental Impact Statement (EIS) as specified by the State Environmental Quality Review Act. Under New York State Environmental Conservation Law, 6 NYCRR Part 617, an EIS is by definition a comprehensive study of proposed site specific individual land uses. An EIS “provides a means ... to systematically consider significant adverse environmental impacts, alternatives and mitigation” and “facilitates the weighing of social, economic and environmental factors” (617.2 (n)). The law specifically states that the “adoption of a municipality’s land use plan, the adoption by any agency of a comprehensive resource management plan or the initial adoption of a municipality’s comprehensive zoning regulations” is a Type 1 action which “carries with it the presumption that it is likely to have a significant adverse impact on the environment and may require an EIS” (617.4 (b)(1) & 617.4 (a)(1)).

As permitted by Town Law Section 272-a 8, the Town designed the Comprehensive Plan to serve as a Generic Environmental Impact Statement (GEIS). GEIS’s are broader and more general than site or project specific EIS’s. They are appropriate for assessing the environmental impacts of “an entire program or plan having wide application or restricting the range of future alternative policies or projects, including new or significant changes to existing land use plans, development plans, zoning regulations or agency comprehensive resource management plans” (617.10 (a)(4)). By structuring this Comprehensive Plan as a GEIS, the Town not only complied with State Law, but it saved time and ensured that the Plan was truly comprehensive.

In accordance with the requirements for a GEIS, goals and objectives of both the original 2009 Plan and this Update underwent extensive environmental review. First, goals and objectives for matters to be considered in the Plan were collected through an extensive scoping process. Input gathered during the public meetings and received via e-mails and letters was grouped and categorized. This input was processed and tabulated in the form of “actions” which were then carefully studied to determine any potential adverse impacts before any action was recommended for implementation within the Comprehensive Plan Update. Mitigation was proposed to eliminate or reduce the extent of each of the adverse impacts in general terms, realizing that as goals and objectives of this plan are implemented, site or project specific review will be required of additional potential adverse impacts.

This analysis allowed each recommendation to be fully weighed and considered, and helped to resolve potentially conflicting recommendations. With this information at hand, the Special Board was able to effectively produce the final goals and objectives of the Comprehensive Plan Update.

III – History of Land Use

Clarkstown became an official town on March 18, 1791, when it was separated from the Town of Haverstraw by an act of the New York State Legislature. Since Rockland County was not created until 1798, Clarkstown was first a Town in Orange County before it became a Town in Rockland County. The name Clarkstown is derived from that of the area's principal landowner at the time, Daniel De Clarke. Among the reasons given for the split from Haverstraw were the long travel times to the Town offices and difficulty in managing such a large area of land with a growing population. The first Supervisor of the Town of Clarkstown, David Pye Sr., would later become Rockland County's first Clerk.

Prior to European settlement, several Native American tribes populated the lower Hudson Valley. Among these were the Lenni Lenape (Delaware), Iroquois, Mohegan and Minsie.¹ The name for the hamlet of Nanuet was advanced by James De Clarke in 1856, in honor of a Kakiat Native American who resided in the area. Clarkstown existed as a predominately agrarian township for most of its early history. The county court house, one of Clarkstown's earliest prominent public structures, was built before the Town was separated from Haverstraw. It was constructed in 1774 after the original structure in Tappan was destroyed by a fire. New City was chosen as the new location due to its central location in the county. Soon after, two hotels were built, and in 1815 the Clarkstown post-office was established.²

At this time the Town was almost entirely devoted to agriculture, and goods were sailed down the Hudson to be brought to market in New York City. Grist and sawmills were also common throughout the area and quarries were located near New City as early as 1788 and in Upper Nyack in the early 1800's.³ One of Clarkstown's most important early exports was the ice cut from Rockland Lake by the Knickerbocker Ice Company, the largest ice company in New York.⁴

Clarkstown's early roads and railways, like later transportation infrastructure, played an important part in the Town's development. The Nyack Turnpike, which connected Suffern to the port in Nyack on the Hudson River, was completed in 1828.⁵ This important route spurred early development in the area now known as West Nyack. The many brooks in this area supplied power to grist and sawmills.⁶ Nanuet can attribute its growth to the advent of the Erie Railroad circa 1841.⁷ The hamlet of Congers was named after Abraham B. Conger who donated a tract of land to the West Shore Railroad. The entry of the railroad spurred speculation in this area and led to the purchase of 2,400 acres of land by agents of the Boston Improvement Company. These acres were subsequently sub-divided into 10,000 lots, some as small as 25 x 80 feet in size.⁸

¹ Cornelia F. Bedell, ed. Now and Then and Long ago in Rockland County (N.Y.: Arno Press Inc. 1968) 27

² Bedell, 416

³ Bedell, 253-254

⁴ Bedell, 239

⁵ SEARCH Foundation, Portrait of West Nyack (NY: Zingaro Printing Corporation 1973) 16

⁶ Frank Mertangue Green The History of Rockland County (Historical Society of Rockland County 1989) 417

⁷ Green, 422

⁸ Thom Olsen, "Centennial History of Congers, 1883 – 1983. Rockland County Century of History (Canada Historical Society of Rockland, 2002) 330

Likewise, the hamlet of Bardonia received its name from that of the Bardon family who farmed and operated an iron product shop in the area.⁹

During the twentieth century several transportation projects had enormous impacts on the development of Clarkstown. In 1947 construction began on the Palisades Interstate Parkway. The Parkway runs a total distance of 42 miles between Bergen County, New Jersey and Orange County, New York, cutting a north-south route across Rockland County; the project was completed in 1958.¹⁰ In 1945 a decision was made to build the New York State Thruway which would run from Buffalo to Albany and then south to the New York/New Jersey border.¹¹ The eventual path of the Thruway through Rockland County would influence a project of even greater significance in the region. In 1955, the construction of the Tappan Zee Bridge brought about immense changes to Clarkstown's landscape, and led to the development which shaped the Town into the place it is today. Proposals for a Hudson River crossing in this area had been made as early as 1930.¹² Construction of the bridge began in March 1952 after a long debate over where the structure should be placed; the bridge was opened on December 15, 1955. With the opening of the Tappan Zee Bridge, Clarkstown experienced a population boom doubling from 1950 to 1960, and almost doubling again from 1960 to 1970 (Chart 1). With this change, agricultural activity in the Town declined as land was sold and developed for housing. In an effort to guide future development, the Town adopted a Master Plan in 1966. During this time many Town and County roads were constructed and improved, and numerous infrastructure improvements were undertaken to keep pace with the Town's growing population.

With the rapid growth in population and subsequent infrastructure expansion, the Town experienced an influx of business and industry. Small retail stores and strip malls developed throughout the Town, and several large firms located their offices and industrial works in Clarkstown. The Nanuet Mall, which opened in 1969 and has since been redeveloped into the Shops at Nanuet, featured 101 stores in a fully enclosed two-level complex.¹³ In 1998, the Palisades Center Mall opened; this four-story, 1.85 million square feet shopping complex is one of the largest malls in the country and attracts shoppers from the entire region.

Today, Clarkstown has a varied land use pattern. Aside from its parks and water bodies, much of Clarkstown's 41 square miles has been developed according to the Town's zoning districts (Figure 1). Rockland Lake State Park and High Tor State Park, both owned by the Palisades Interstate Park Commission, along with parkland owned by the County of Rockland, generally ring the northern and eastern borders of the Town, while Town parkland is evenly distributed throughout the municipality. The Town's major water bodies include Rockland, Swartout and Congers Lakes and Lakes Lucille and DeForest, the most prominent being Lake DeForest which bisects the Town and is traversed by a causeway, County Route 80, the only major east-west roadway aside from Route 59 and the Thruway. The remaining major roadways, U.S. 9W, and State Routes 303 and 304 run north-south and were developed alongside or in place of rail lines.

⁹ John Scott, "Bardonia" *Rockland County Century of History* (Canada Historical Society of Rockland, 2002) 327

¹⁰ *The Roads of Metro New York*, 2009, Eastern Roads, June 4, 2009, <http://www.nycroads.com/roads/palisades>

¹¹ Linda Zimmerman, ed. *Rockland County Century of History* (Canada Historical Society of Rockland, 2002) 183

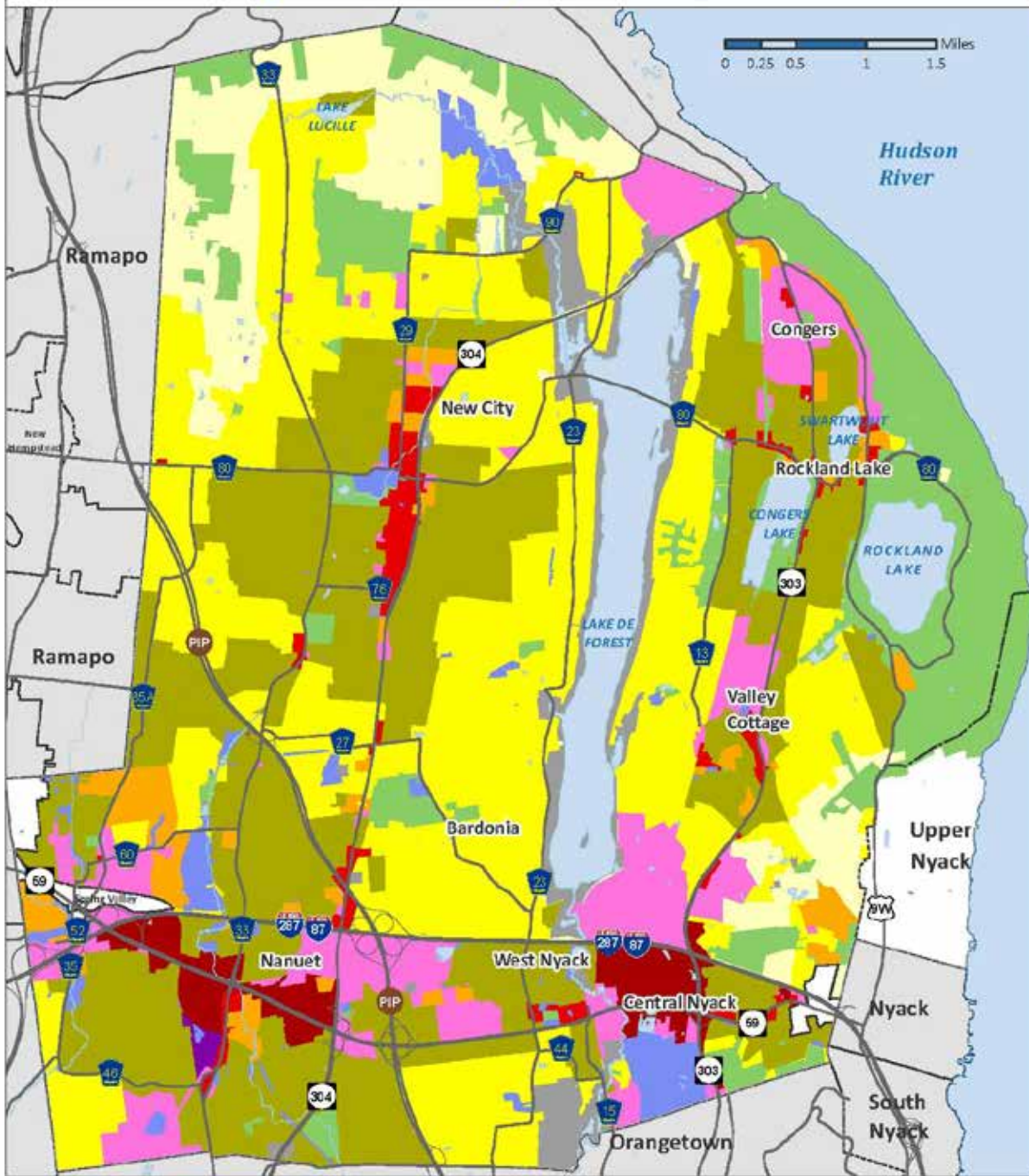
¹² Zimmerman, 179

¹³ Clarkstown Town Board, Town of Clarkstown, N.Y. (1991) 23

Town of Clarkstown, NY: 2021 Comprehensive Plan



Current Land Use & Generalized Zoning

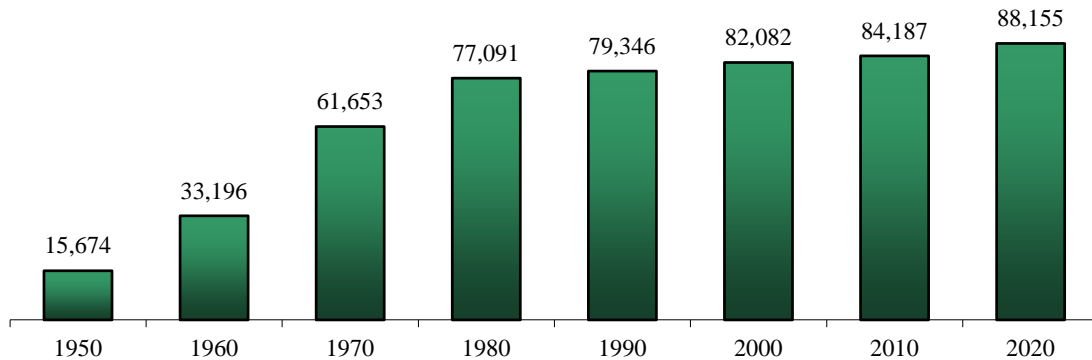


Prepared by: Clarkstown Planning Department, GIS.
 Source: Clarkstown Planning Department, GIS; Rockland County Planning Department, GIS.
 The Town of Clarkstown makes no warranties express or implied, as to the accuracy of the data on this map.
 This map is for general information purposes and must not be relied upon for engineering or site specific purposes.

Figure 1

Chart 1
Town of Clarkstown
Population: 1950-2020

(Source: U.S. Census Bureau, EASI Demographics 2021)



Clarkstown is composed of the hamlets of Bardonia, Central Nyack, Congers, Nanuet, New City, Rockland Lake, Valley Cottage, West Nyack, all of the Village of Upper Nyack, and portions of the Villages of Nyack and Spring Valley. New City is the seat of both Town and County governments. All of the Town's Hamlet Centers are situated in close proximity to State highways. Hamlet Centers typically have shopping that serves residents in the immediate vicinity. Major regional shopping is found primarily along Route 59, where both the Palisades Center and the Shops at Nanuet are located. Industrial and office parks are also situated along State highways generally between Hamlet Centers. Two rock quarries are located in Clarkstown, both in manufacturing zones in West Nyack and New City. The majority of the Town's land is developed as residential, generally following a concentric zoning pattern around the Hamlet Centers, with higher densities nearer the center and lesser densities farther away, the exception being clusters of multi-family development each totaling over 1,200 units in Nanuet and Valley Cottage.

Upon adoption of the 2009 Comprehensive Plan, the Town began the task of implementing the goals and objectives of the plan. A study of the zoning along all of the Town's state roadways followed and, as a result, significant rezoning was conducted along these important commercial corridors, including the creation of the Commercial Office (CO) and Commercial Office Support (COS) zoning districts. These districts allowed for more flexible commercial development options, and included provisions for new uses and bonuses for environmental sustainability. The Neighborhood Shopping (NS) zoning district was also created to allow for pedestrian accessible commercial development proximate to the Town's residential neighborhoods. Additionally, in response to concerns over out-of-scale development within the Town's single-family residential neighborhoods, the Town passed a sweeping package of zoning amendments to ensure the character of these areas remains intact. In order to facilitate the development of senior housing, the Town made multiple amendments to its zoning code, and now allows for the construction of

these units in Hamlet Centers, several other zoning districts, and in many residential areas along State and County roadways as a Special Permit use.

In 2018, all traffic lanes opened on the Governor Mario M. Cuomo Bridge, which replaced the aging Tappan Zee Bridge. This new bridge features more lanes, and is built with the capability to hold a commuter rail line. The bridge's bike and pedestrian path was opened on the north side of the bridge in 2019. Also in 2019, the Nanuet Transit Oriented Development zoning was adopted. This zoning created four new districts, and allows for mixed-use and higher density residential development around in the Nanuet Hamlet Center, surrounding the Nanuet train station. As the only commuter rail station in the Town, this area is uniquely poised to offer housing to commuters, younger persons and senior citizens, who rely less on the automobile for transportation and are more likely to take advantage of shopping and the transit services in the area.

Changing preferences in retail shopping have begun to impact the development of large-scale retail businesses, and the Town will need to plan for the redevelopment and use of currently underutilized retail spaces. The worldwide outbreak of the Covid-19 virus has even further bolstered preferences for mail-order and fast pick-up retail services. While the lasting impacts of the virus on land use are yet unknown, it is very likely that the work/home balance will be impacted indefinitely, creating the demand for new types of workspaces and shopping options. The current rapid development of online retail distribution centers is evidence of these changing behaviors, and the Town must be ready to adapt to these changes. In addition, emphasis continues to grow on the protection of the natural environment and the sustainability of the built environment, issues which can be uniquely addressed by the Comprehensive Plan. With change comes the opportunity for advancement and betterment, and, as the Town of Clarkstown has done in the past, it will meet the future with a vision and commitment to ensuring it is a community of unsurpassed quality.

IV – Vision Statement (Proposed Action)

A changing regional landscape and shifts in economic trends and demands call for preparedness in anticipation of future needs. The Town of Clarkstown has a strong history of land use planning, which has served the community well through decades of change. It is with an eye to the future that this updated Comprehensive Plan will serve as a path for the Town to follow over the next decade, as it has done with great success through the previous; for now, more than ever, the Town needs to look ahead...

Aptly titled “Focused on the Future,” this updated Comprehensive Plan works to address the evolving needs of the Town which have arisen since the original Plan was published in 2009. In the twelve years that have passed since the adoption of the 2009 Comprehensive Plan the demands upon our Town’s most precious commodity, its land, have shifted in dramatic fashion. Large state and regional projects, such as the Governor Mario M. Cuomo Bridge and the Lower Hudson Transit Link, have been completed, and increased emphasis has been placed on redevelopment, transit options, and compact growth. Environmental concerns continue to shape building and zoning policy, and new innovative technologies are progressing and allowing for development which produces less of an impact on the natural environment. In working to protect the natural environment, the Town must also understand what future environmental challenges it may face, and adopt policies to ensure resiliency. Looking toward the future, it is clear that the Town will need to re-examine what has already been built when looking for areas to host new development. As behaviors and systems change, the existing pattern of land use must also adapt to accommodate these changes in the most responsible ways possible. It is the vision and intent of this updated Comprehensive Plan to guide Clarkstown into the future so that this community may continue to be one which promotes health, safety and opportunity for all residents, current and forthcoming.

V - Comprehensive Plan Goals and Objectives

a) Economic Development

The Town of Clarkstown is home to a diverse range of businesses and is positioned as a desirable locale for many others. The Town offers businesses an attractive setting to anchor their enterprises, complete with service and financial institutions to provide necessary supportive functions, as well as a solid infrastructure to keep businesses running smoothly once they are established. Clarkstown is a business-friendly community in every sense of the term, and the Town is constantly renewing its efforts to ensure it remains as such; like the successful businesses which are sited and located in Clarkstown, the Town must evolve to meet the challenges posed by the shifting demands of the economy as they arise.

Clarkstown's largest business sector in 2005 was retail trade; it is now Health Care and Social Assistance, as was predicted by the 2008 Town of Clarkstown Economic Development Strategy prepared by Saratoga Associates. While retail employment decreased slightly between 2005 and 2020, the Health Care and Social Assistance, Accommodation and Food Services and Administrative Support sectors all made significant gains (Table 2).

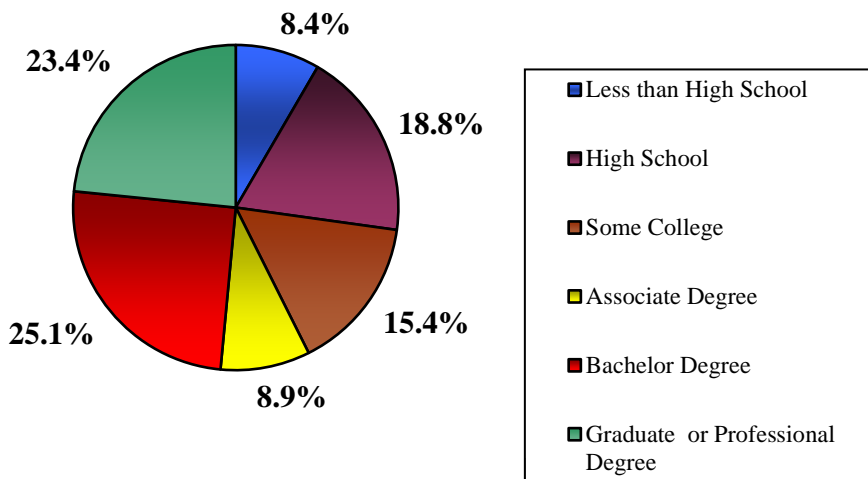
Table 2
Town of Clarkstown Leading Business Sectors
(Source: EASI Demographics 2021)

Business Sector	# of Persons Employed (2005)	# of Persons Employed (2020)
Health Care and Social Assistance	6,856	10,006
Retail Trade	7,884	7,592
Accommodation and Food Services	2,943	4,016
Administrative Support, Waste Management and Remediation Services	1,981	2,797
Professional, Scientific and Technical Services	2,687	2,425
Construction	2,336	2,216
Educational Services	<1,000	1,471
Wholesale Trade	1,482	1,440
Information	1,271	1,272
Other Services (except Public Administration)	1,706	1,268
Arts, Entertainment and Food Services	<1,000	1,166
Finance and Insurance	1,083	1,163
Manufacturing	1,408	1,149

The Town of Clarkstown has four large commercial parks totaling over 100 acres of land. These areas are well suited to accommodate the needs of the business sectors targeted for growth in the future. In addition to these commercial parks, construction of the Kohl Industrial Park was completed in 2009. This park, located on 15 acres of land in Congers, provides over 254,000 square feet of industrial and office space.

As of 2020, 57% of the Town of Clarkstown’s residents over the age of 25 had a college degree while 91.6% had a high school diploma (Chart 2). These numbers correspond with the composition of the Town’s workforce, a substantial portion of which is employed in management and professional occupations. Furthermore, this makeup is also the driving factor behind Clarkstown’s higher household and per capita income figures.

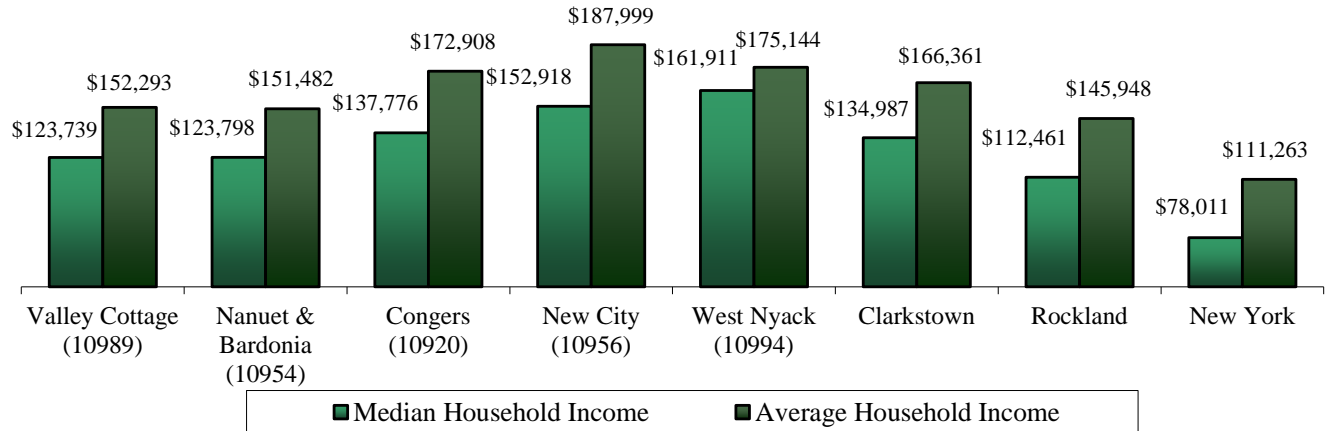
Chart 2
Town of Clarkstown
Educational Attainment, Population 25+ Years Old: 2020
 (Source: EASI Demographics 2021)



A comparison of median and average household incomes within Clarkstown illustrates the degree of economic diversity within the Town (Chart 3). While incomes in Clarkstown are overall higher than those of all of Rockland County, the large difference between median and average household incomes indicates the presence of substantial income gaps. This reinforces the need to support not only a wide range of job-types within the Town, but also emphasizes the importance of developing a diverse housing stock.

Chart 3
Household Income Characteristics,
Town and Hamlets of Clarkstown: 2020

(Source: EASI Demographics 2021)



The Clarkstown Economic Development Strategy prepared by Saratoga Associates identified the following as target industries for the Town of Clarkstown:

- Biotechnology
- Clean technology / alternative energy
- Educational services
- Financial services
- Information technology
- Medical devices
- Professional and technical services

The study also recommended that new commercial and industrial development be directed to existing business cores and designated growth areas. As prime land for commercial and industrial development, it was also recommended that Route 303 be considered for infrastructure improvements; this recommendation was also made by Cambridge Systematics in the Town of Clarkstown Comprehensive Transportation Plan. The Town has since considered designating this area “the Congers Corporate Corridor,” to increase recognition of the development opportunities offered within. The Town is coordinating with the State on regional transportation initiatives along Routes 303 & 304 which will add to the economic strength and quality of life within the Town (further information can be found in the Transportation section).

A subset of the 2008 Economic Development Strategy was a Mall Redevelopment Strategy, which particularly focused on the Nanuet Mall and Palisades Center. The Strategy provided recommendations for these major retail centers based on national trends in the reuse and revitalization of older malls including the emergence of lifestyle centers and mixed-use town centers. In 2013 the Nanuet Mall was redeveloped and opened as the Shops at Nanuet, a 750,000 square foot lifestyle center. In November 2020, Clarkstown voters passed a referendum removing a restrictive covenant of the Palisades Center Mall, which will allow the Mall to utilize

236,000 square feet of existing unused space within the mall, and develop 242,000 square feet outside of the current building. An environmental review under the provisions of SEQRA and Planning Board approval will be required before either of these areas can be utilized. The permission to utilize this space was also a recommendation of the Clarkstown Business and Economic Development Advisory Committee, which was established in 2019 to develop a strategic, pro-growth economic plan for the Town (see Appendix Section V.Q.).

Now, as consumer behavior continues to shift toward internet-based shopping and delivery services, retail stores face new challenges. As these trends have only been reinforced by the Covid-19 pandemic, vacancies are increasing in many larger, traditionally designed malls and retail centers. As such, the Town must begin focusing on flexible options for the use of these spaces. Coupled with the need for a more diverse range of housing options, examining zoning changes that would permit housing in certain traditionally commercial areas should be considered. Furthermore, as most of these commercial areas are located on State and County roadways, they are more likely to be able to handle the infrastructure needs of such development, particularly in regard to roadway capacity and transit options. Similarly, more streamlined zoning regulations, such as standardized commercial parking requirements, can be considered to increase site development flexibility and expediency.

Like most communities located on the outskirts of the New York Metropolitan Area, Clarkstown is experiencing pressures to build additional residential units. This outward movement to the suburbs has resulted in higher housing costs and has exacerbated the need for both affordable and workforce housing in Clarkstown. A diverse economy requires a workforce that includes a variety of job types and associated salaries. Younger persons entering the workforce are interested in housing options other than single-family homes, which most cannot yet afford. Housing prices and options must reflect this variety, as housing diversity is essential to sustaining a viable economy and an inclusive community. In addition, housing options must also take into account a range of other considerations. Not only must housing be provided across a range of prices, but options which account for the needs of the community's senior citizens, disabled, and those that require later life care must be provided for. Additionally, the 2008 Economic Development Strategy recommended the development of varied housing, and favors Clarkstown's hamlet centers as areas in which new housing types may be added in conjunction with office and retail development.

With a limited amount of vacant commercial and industrial space spread throughout the Town it is crucial to maintain a database of these areas to aid prospective businesses in their consideration of Clarkstown as a possible business location. Through the office of the Town's Intergovernmental Relations/Economic Development Coordinator such properties can be catalogued for swift reference when needed. The Town must also remain vigilant about innovative redevelopment and reclamation opportunities, which can potentially open up new or underutilized areas for new commercial and industrial development. The establishment of a dedicated Town office for economic development and the compilation and analysis of information on the Town's commercial sector was also recommended by the Clarkstown Business and Economic Development Advisory Committee in their 2019 report.

Clarkstown's local economy could be bolstered further by enhancing connections between local employers and Clarkstown's schools. After-school programs, internships, job shadowing, mentoring programs, and partnerships with local businesses and higher-educational institutions will be considered primary strategies to augment a skilled workforce originating from within the community. In addition, programs which cater to fledgling business, such as business incubators and microfinance, will be sought out and supported by the Town.

GOALS & OBJECTIVES

Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and will not conflict with existing residential uses. Both the 2008 Economic Development Strategy prepared by Saratoga Associates and the Comprehensive Transportation Plan prepared by Cambridge Systematics make specific recommendations pertaining to the development and expansion of Clarkstown's existing commercial and industrial sectors which are situated along its State Route corridors (Figure 2). To ensure the Town does not lose economically viable land zoned for commercial, industrial or office uses, fiscal analyses will continue to be conducted for proposed zone changes from non-residential to residential districts.

Construct a database of information about the Town's commercial sector. By maintaining a database of information on businesses and commercial real estate, Clarkstown can more readily assist businesses seeking to locate within the Town. This database will also provide a localized tool for monitoring municipal commercial trends. In order to establish this database a number of partnering organizations, such as the Rockland Business Association, Industrial Development Agency and Chambers of Commerce, can be contacted and individual businesses surveyed to make the process as comprehensive as possible. In addition, a software tool will be developed to allow businesses to query this database by location or category.

Enhance communication between the Town and the business community. To provide more information directly to the business community, the Town will consider adding an economic development page to its website. An economic development handbook will be produced for distribution to local businesses. This will provide businesses with commonly requested information on conducting business within the Town, information on funding sources, and contacts to municipal and regional commerce organizations. The Town's membership in economic development organizations such as "Patterns for Progress" will provide the Town with the latest information on conducting business in the Hudson Valley. The Town will continue its direct outreach to the commercial sector by organizing visits to local businesses.

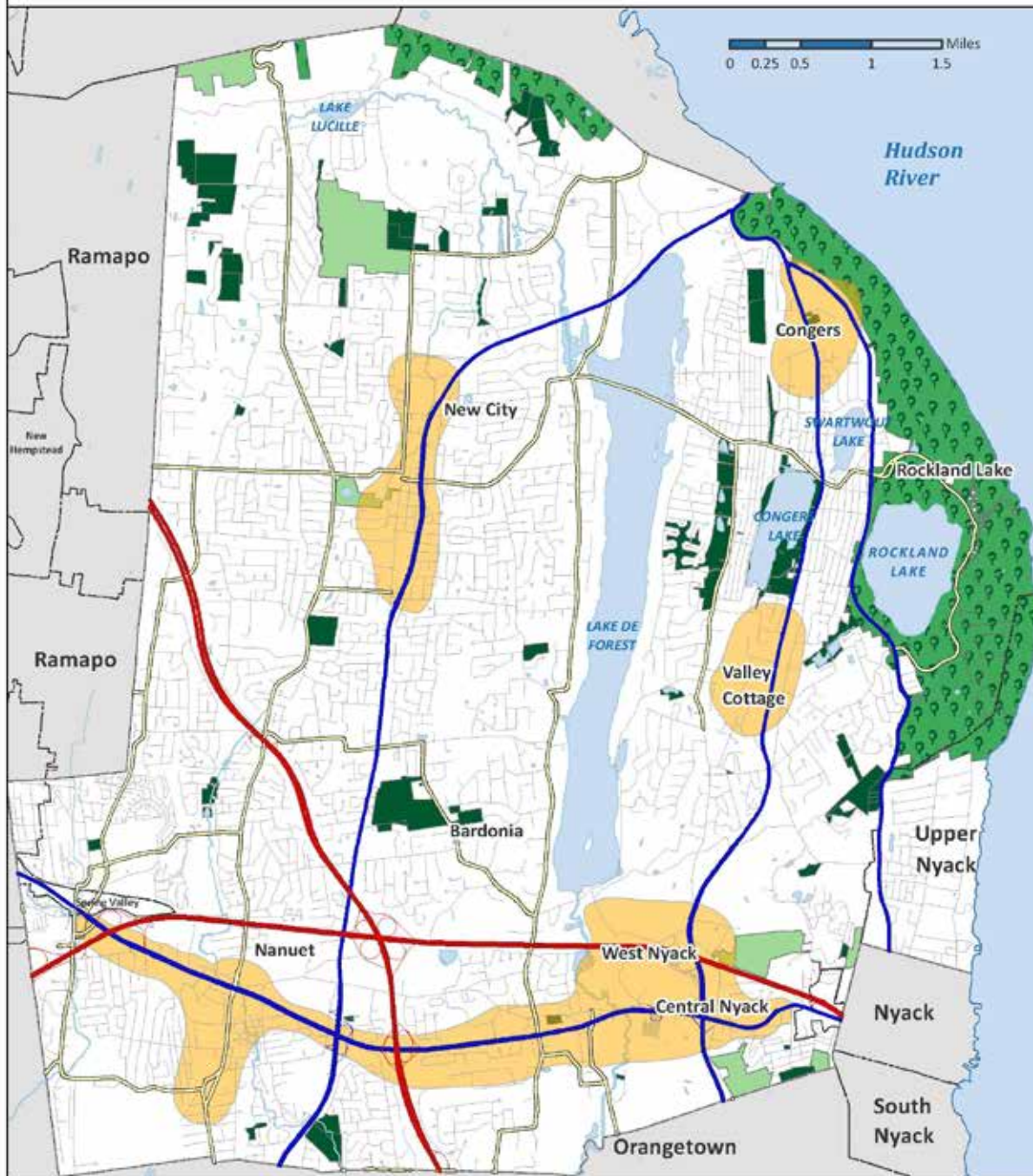
Continue the Office of Intergovernmental Relations/Economic Development to attract new businesses and assist business already established within the community. A Town office dedicated to economic development is a fundamental component for the vitality of the Town's business sector. Through this office, inquiries concerning economic development can be handled swiftly and information of this nature can be organized, stored and disseminated from a single location. Currently, Clarkstown is the only Town in Rockland County with such an office dedicated to working to promote, attract and retain businesses within the municipality.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Economic Development Areas

- | | | |
|----------------------------|--------------------|-------------------------------|
| Lakes and Streams | Interstate Highway | Clarkstown Parks & Open Space |
| Town & Village Boundaries | State Highway | Rockland County Parks |
| Economic Development Areas | County Highway | New York State Parks |
| | Local Road | |



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Figure 2

Work to ensure that a variety of housing options exist within the Town. The Town must examine ways in which to provide additional affordable housing units. This housing diversity is crucial to a successful local economy. Skilled workers will migrate to areas providing similar salaries and lower housing costs if more options are not made available. The goals and objectives put forward in the Housing section will be implemented.

Create connections between the commercial sector and educational institutions. The Town will work to establish links between schools, colleges and the business community to endorse curricula and programs that teach students the skills that are in demand in the local economy.

Implement new programs and continue those already in place that beautify the Town, making it an attractive place in which to live and conduct business. Maintaining and enhancing the aesthetic qualities of the Town are important to preserving the high quality of life enjoyed by Clarkstown's residents and businesses. Ensuring compliance with property maintenance regulations is also crucial in preserving such qualities. Programs and policies that preserve and enhance the aesthetic environment, such as façade and streetscape improvements, are also fundamental to attracting new businesses to the community.

Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces. Shifting consumer trends have led to vacancies in many malls and retail areas. In order to keep these areas viable, and satisfy the demand for increased housing options, the Town will explore zoning changes that would permit new uses in pre-existing commercial zones, if these areas have the infrastructure to carry such development. Unit caps, as were done for the Active Adult Residential (AAR) floating zone and Senior Housing Special Permit, will be considered for these developments in order to manage residential growth.

Work to ensure the Town's Zoning Code can accommodate new and upcoming commercial and industrial uses. As new technologies, consumer behaviors and workplace environments continue to undergo rapid transition, the Town's Zoning Code will be continually updated to accommodate these changes. Of particular note are distribution and delivery centers, hi-technology enterprises, filming and autonomous vehicles. Traditional enterprises that have recently expanded in the region, such as brewing and distilling, will also be integrated into the Town's Zoning Code. Additionally, the lasting impacts of the Covid-19 pandemic on the workplace and schooling are yet unknown, and could create a demand for more flexible home/work provisions.

Consider the implementation of a transfer of development rights program. A transfer of development rights program will allow the Town to increase development density in targeted areas, while decreasing density in areas selected for conservation. Increased development flexibility through the allowance of greater building density could help attract new businesses to the Town, and provide others with the opportunity to expand. The Town will explore whether the benefits of such a program are suitable for implementation, and by which means such a program could be instituted.

b) Environmental Resources

The environmental diversity of the Town of Clarkstown is one of the features that attract residents, as well as commercial and business development. This diversity will be protected and enhanced within the framework of the Comprehensive Plan so that the balanced development of the Town will continue.



Cranford Drive Drainage Project

Residents have raised a number of concerns for the future development of the Town; among these are adaptive re-use of existing buildings and sites, air quality, managing and controlling future development, energy and energy conservation, flooding and flood control, flora and fauna, capacity of existing infrastructure for both future development and stormwater run-off, noise, light and dust pollution, recycling, general resource conservation, visual resources, and water resources.

These general concerns and more specific considerations are the basis for this section and for goals and objectives to address the environmental issues of future land use within the Town.

Land Resources

Soils within the Town vary extensively, ranging from deep, well-drained loam soils to glacial tills (Figure 3). Overall, there are 43 different soil types present within the Town, with Wethersfield, Wethersfield-Urban Land Complex, Cheshire-Urban Land Complex and Holyoke-Rock Outcrop Complex being the most prevalent. However, much of the soils are Hydrologic Group C and D soils with lower permeability rates, which severely impacts infiltration capacity. Development on these types of soils has resulted in higher runoff rates due to the accompanying increases in impervious coverage. While the early development of Clarkstown was heavily agricultural, this use has declined and been replaced with predominantly residential uses. There are now only a handful of farm operations still active in the Town (Figure 4). Cropsey Farm in New City was acquired for open space through a partnership between the State, County and Town. Currently, 12 acres of the 24 acre property are farmed by the Rockland Farm Alliance under a lease agreement. The last large operating farm in the Town is Dr. Davies' 48 acre apple orchard located in Congers. The remainder of the Town has largely been developed with impervious surfaces.

Underlying bedrock geology is composed mainly of the Holyoke-Rock Outcrop Complex and Chatfield-Rock Outcrop Complex soils, totaling 2,969 acres which are found generally on the hillside areas on the east and north sides of the Town, along the Palisades Ridge and Hook Mountain (Figure 5). A small area (19 acres) of Chatfield soil is located on the east side of Lake DeForest.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Five Major Soil Types

- Lakes & Streams
- Town & Village Boundaries
- Major Roads

- CuB, Cheshire-Urban land complex, 2 to 8 percent slopes
- HoD, Holyoke-Rock outcrop complex, hilly
- WeB, Wethersfield gravelly silt loam, 3 to 8 percent slopes
- WeC, Wethersfield gravelly silt loam, 8 to 15 percent slopes
- WuB, Wethersfield-Urban land complex, 2 to 8 percent slopes



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Figure 3

Town of Clarkstown, NY: 2021 Comprehensive Plan



Agriculture

- Lakes & Streams
- Farms
- Town & Village Boundaries
- Major Roads



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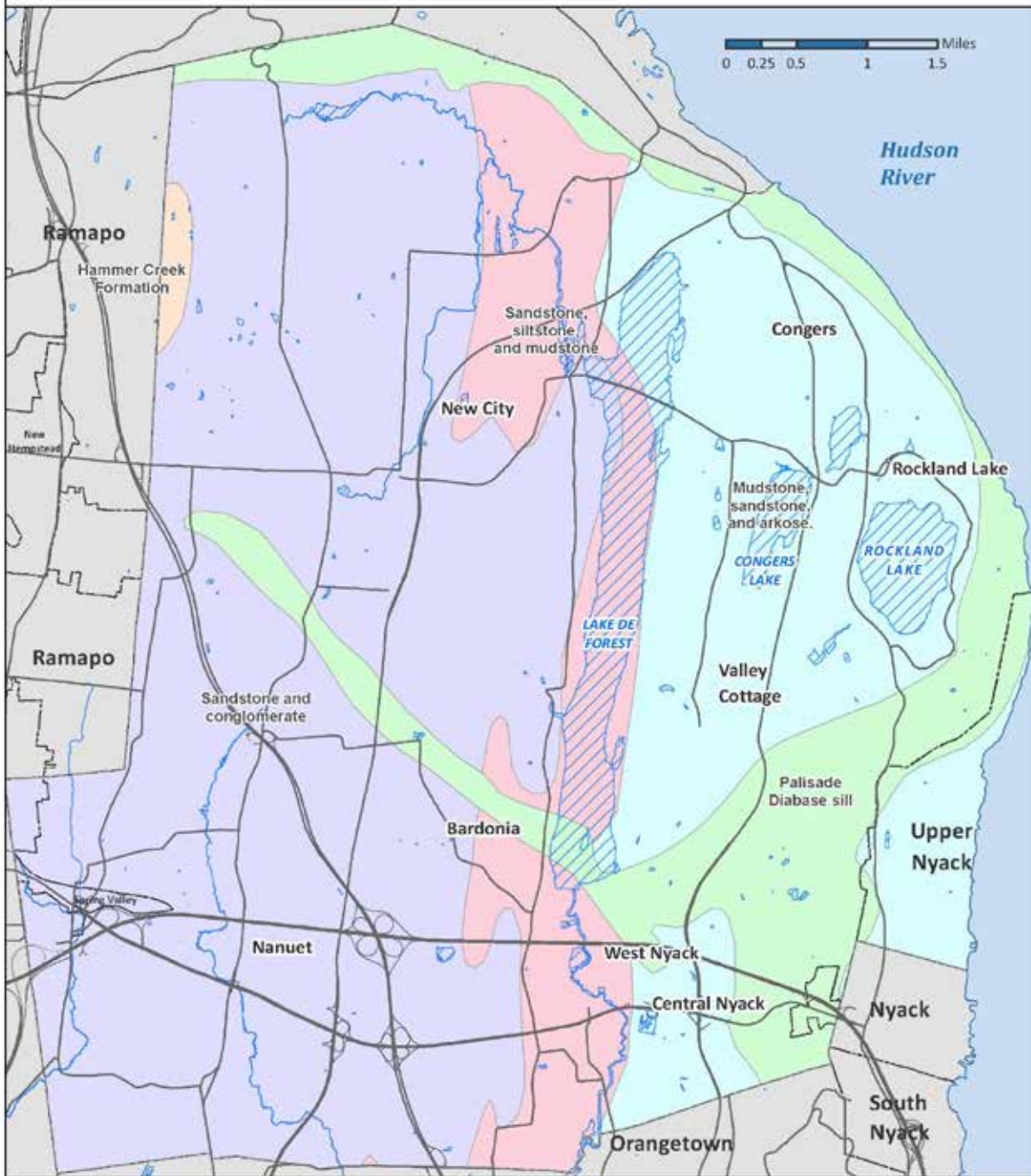
Figure 4

Town of Clarkstown, NY: 2021 Comprehensive Plan



Bedrock Geology

- | | | |
|---------------------------|--|------------------------------|
| Town & Village Boundaries | Trba, Mudstone, sandstone, and arkose | Trhc, Hammer Creek Formation |
| Lakes & Streams | Trbg, Sandstone and conglomerate | Trp, Palisade Diabase sill |
| Major Roads | Trbs, Sandstone, siltstone, and mudstone | |



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Figure 5

These soils are shallow soils over bedrock formations, with 15% to 30% rock outcrop depending on the slope of the formation. These soils are characterized by moderate to severe surface run-off and erosion potential.



Hook Mountain

Cliffs are generally not found within the unincorporated portions of the Town, but rather on the east side of Town, more within the boundaries of the Village of Upper Nyack. Unique landforms within the Town include the steep slopes and ridgeline of the eastern and northern parts of the Town (Figures 6 & 7). These have sensitive characteristics from the standpoint of soil erosion, rock outcrops and visual impacts from within and outside of the Town.

Ridgelines and steep slope areas are predominant around the east and north sides of the town, part of the Palisades Ridge formation. These areas are minimally developed, and in some locations the Town has already acquired several parcels under its open space initiative to preclude development on these lands. However, there are still several parcels capable of development, and with increasing development pressure these will be carefully analyzed to avoid severe impacts to both the view shed and soils.

Soil erosion and resultant sedimentation of receiving waterbodies has and continues to be a major concern for the Town of Clarkstown. While the major source of sediment has traditionally been from active construction sites, erosion of soils is a naturally occurring phenomenon and additional soils are eroded from stream banks due to increases in storm run-off. These factors all contribute to lessened water quality levels, reduced stream and wetlands functionality, and increased potential for flooding.

Water Resources

The Town is crisscrossed with a number of streams and rivers, which generally flow to the south and discharge into the Town of Orangetown or the Town of Ramapo (Figure 8). The major streams are the Hackensack River, the Naurashaun Brook and the Pascack Brook. These ultimately discharge into Newark Bay, demonstrating the large scale area both affecting and affected by drainage originating in the Town of Clarkstown. The Town is enrolled in the Federal Emergency Management Agency flood damage prevention program, and many of the Town's streams and rivers have been analyzed for flood plain mapping (Figure 9). Studies by the Center for Watershed Protection indicate that impervious coverage is directly related to impacts on streams and resultant stream degradation.

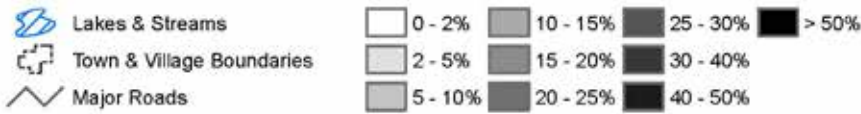


Lake DeForest

Town of Clarkstown, NY: 2021 Comprehensive Plan



Slope Steepness by Percent



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Figure 6

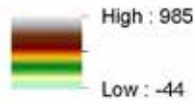
Town of Clarkstown, NY: 2021 Comprehensive Plan



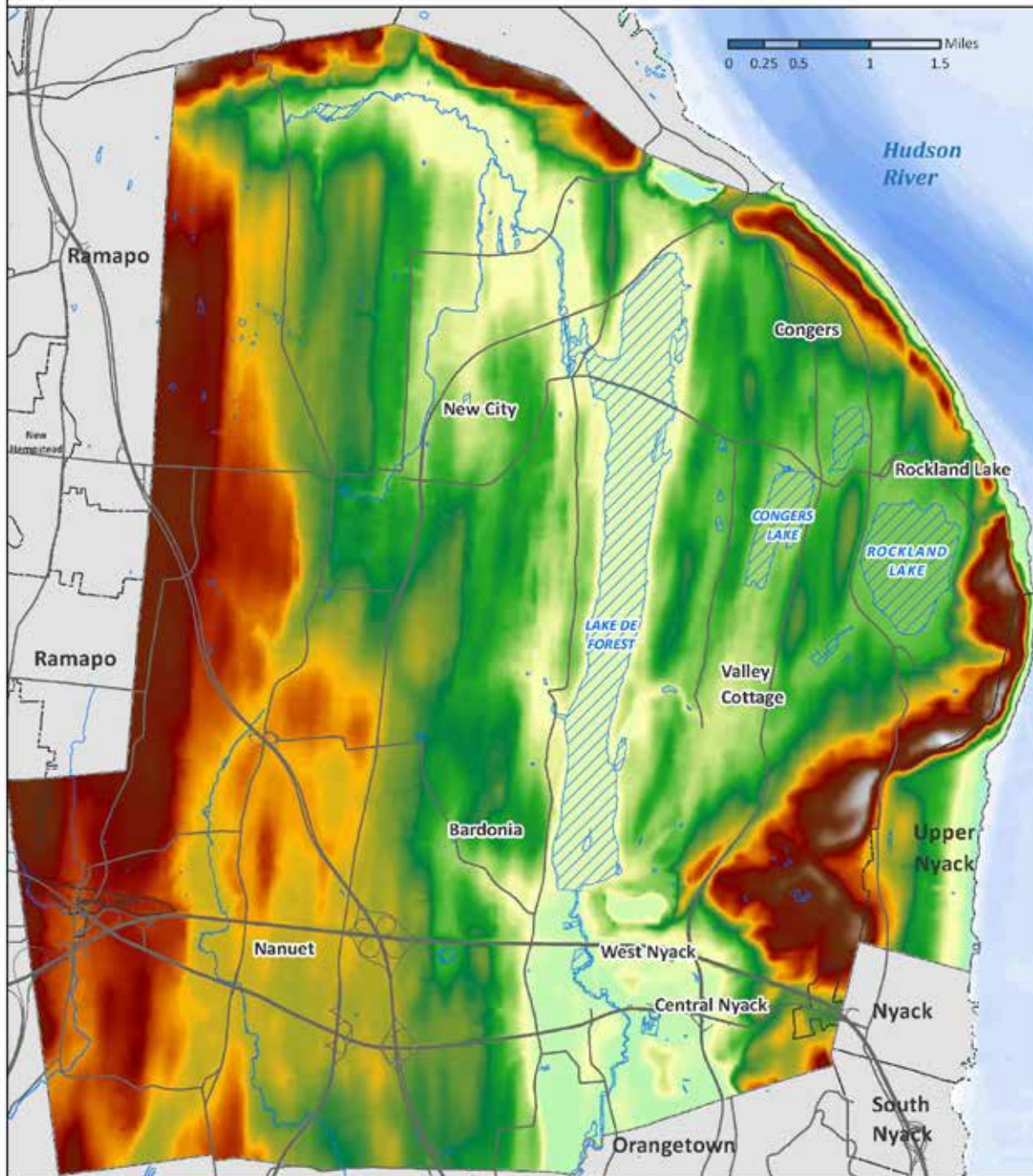
Elevation Zones

- Lakes & Streams
- Town & Village Boundaries
- Major Roads

Feet Above Mean Sea Level



Feet Below Mean Sea Level



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Figure 7

Town of Clarkstown, NY: 2021 Comprehensive Plan



Surface Water Bodies & Sub Watershed Zones

- Lakes & Streams
- Sub Watershed Zone
- Town & Village Boundaries
- Major Roads



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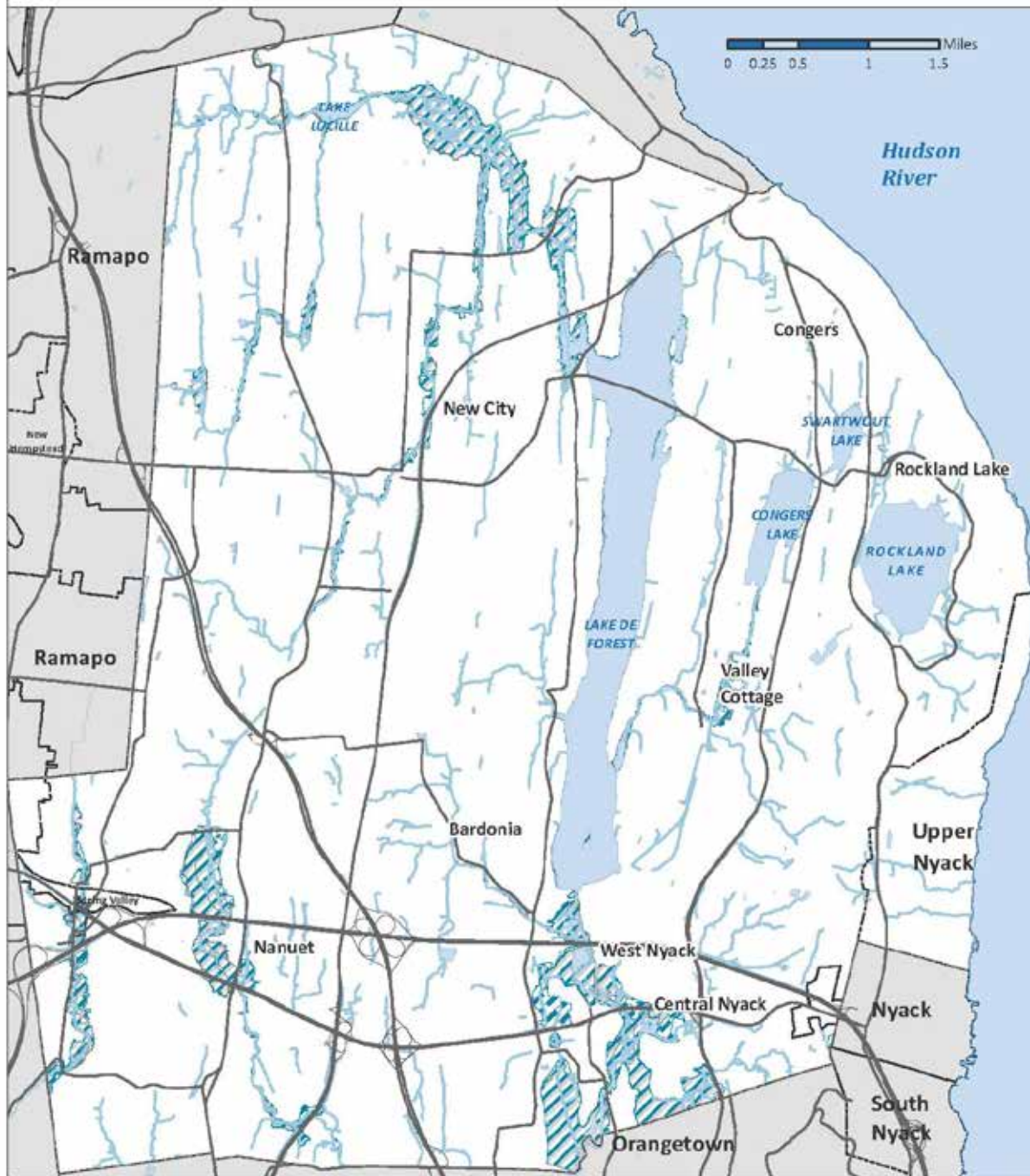
Figure 8

Town of Clarkstown, NY: 2021 Comprehensive Plan



FEMA Flood Zones

- Lakes & Streams
- Town & Village Boundaries
- Major Roads
- 100 Year Flood Zone
- 500 Year Flood Zone



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Figure 9

The Rockland County Health Department has performed some measurement of impervious coverage within the Towns based on aerial photography, and indicates that many streams in the County are impacted based on impervious cover percentages.

Several major lakes and ponds exist within the Town, including Rockland, Swartout and Congers Lakes and Lakes Lucille and DeForest. Of the five, Congers Lake and Lakes Lucille and DeForest are manmade impoundments, the latter being owned by Suez Water and representing a major water supply source for Rockland County. Wetlands are distributed throughout the Town of Clarkstown, and are regulated by the U.S. Army Corps of Engineers and the New York State Department of Environmental Conservation (Figure 10). Federal wetlands account for approximately 974 acres, with state wetlands accounting for approximately 447 acres. There is significant overlap of these two jurisdictions. In addition, the federal wetland areas were indicated on mappings from high altitude aerial photographs; the exact delineation of Federal wetlands must be performed in the field to establish final boundaries. Due to these issues, the total extent of wetlands is approximate as shown on the various mappings available. Stringency of wetland regulations varies between the State and the Army Corps, with the State being more rigorous. Army Corps rules include Nationwide Permit provisions which allow filling of wetlands to limited degrees based on information provided by the applicant. In some cases, it has been found that applicant(s) have exceeded the limits established under the Nationwide Permit provisions, and wetlands have been filled to the extent which would require individual permits and a much greater degree of review.

There are several areas within the Town that experience varying levels of flooding during severe storm events. The Town has taken aggressive steps to reduce both the occurrence and severity of flooding, including the completion of large-scale drainage improvement projects such as the Cranford Drive Flood Amelioration project and the construction of the Central Nyack dam and detention basin. Pending projects include the Klein Avenue Levee Improvements and replacement of the Western Highway bridge over the Hackensack River. In addition, the Town has passed new legislation which requires all land development projects to reduce post-development stormwater runoff to 10% below predevelopment levels. The Town's zoning code has been revised to include a maximum lot coverage requirement in several of the Town's zoning districts. This requirement limits the amount of impervious surface that can be constructed on a parcel before mitigation measures are required, thus limiting stormwater runoff from the site. The Town also partners with Rockland County agencies to mitigate environmental hazards through programs like the Rockland County All-Hazard Mitigation Plan, which addresses not only flooding, but drought, wildfire and other risks.

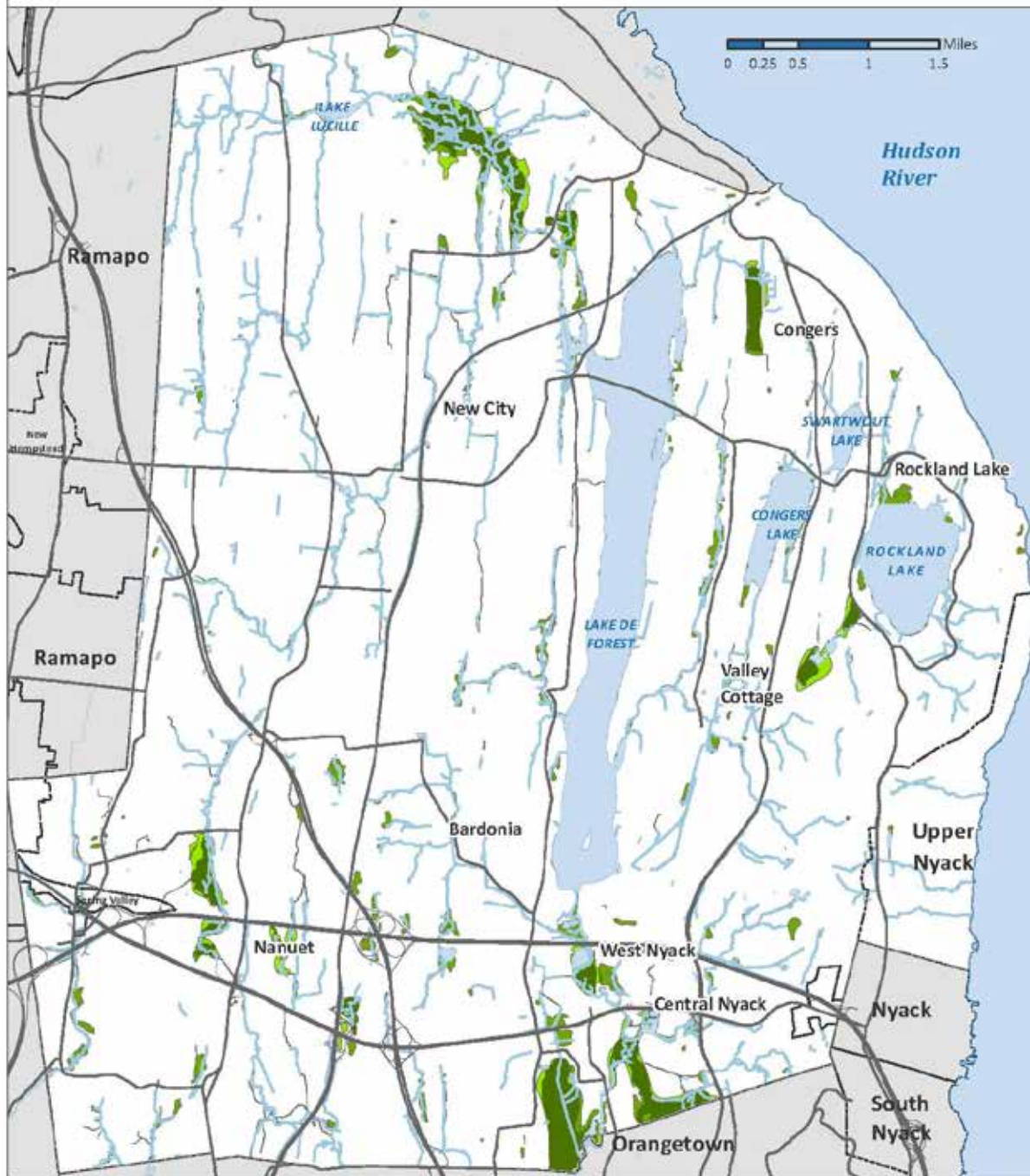
Groundwater issues have existed within the Town for some time, manifested in the form of bleed-out, saturated yards, and basement infiltration. During various months of the year, some of the soils in the Town are subject to a "perched" water table, high groundwater that does not infiltrate into the soil because of an impermeable layer of soil below it. Soils within the Town are generally of hydrologic class C or D, indicating lower permeability, which can exacerbate the types of problems experienced by residents. These issues are serious on a limited scale, and generally are the responsibility of the home or building owner. For the purposes of the Comprehensive Plan, groundwater resources will be preserved or enhanced. Much of the public drinking water supply comes from wells, and there are also many private water supply wells.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Wetlands

- Lakes & Streams
- Town & Village Boundaries
- Major Roads
- New York State & Federal Wetlands
- New York State Wetlands
- Federal Wetlands



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Figure 10

The responsible use of this crucial resource is vital to the community. In addition, preserving a more natural hydrologic cycle will serve to reduce run-off and drainage issues.

Water supply in the Town comes from a combination of surface waters from Lake DeForest and numerous wells throughout the Town. The lake is the most visible and publicly known supply source, and has been a point of contention for various citizen groups. The complaints center on two specific issues, first that water is released downstream, including during those periods of time when the reservoir is very low and the County Health Department has implemented water conservation measures. The second issue relates to the automatic lowering of the bascule gates of the dam, which is intended to prevent excessive loads on the dam structure in the event of large rainfall resulting in excess storage volume within the reservoir. In this case, there seems to be a direct correlation between the lowering of the gates and downstream flooding in the West Nyack area, particularly Klein Avenue and West Nyack Roads. The problem is compounded by the restriction of the Hackensack River by the CSX railroad bridge upstream of NYS Route 59, where the 100 year floodplain elevation increases by approximately 1.5 feet from the Hackensack downstream to upstream faces of that bridge.

In order to protect surface and groundwater resources, the Town joined with the four other Towns in Rockland County to create the Stormwater Consortium of Rockland County, a consortium comprised of Municipal Separate Storm Sewer Systems (MS4s) throughout Rockland County. The Consortium, in collaboration with Cornell Cooperative Extension and the Rockland County Soil & Water Conservation district, provides stormwater education and outreach as well as grant assistance to fund water quality initiatives. The Consortium has also been instrumental in establishing local stormwater laws dealing with illicit discharge detection & elimination as well as erosion and sediment control. Since its establishment by the five Towns, the Consortium has grown to include 24 different municipalities across Rockland County. Additionally, the Town will continue to work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan

Air Resources

Air quality within the Town has been impacted by a variety of land uses and its evaluation is somewhat dependent upon the individual perspective which is employed to evaluate it. The three major factors contributing to air quality are dust, vehicle emissions, and industrial processes. Dust can be attributed to construction site activities in many instances, and is also a complaint leveled against the Tilcon mining sites within the Town. Construction activities are governed by the preparation and implementation of erosion and sediment control plans, which include provisions for dust control. The heating and cooling of buildings by various means also contributes fine particulate matter and toxins to the air.

The Town, and in fact the entire county, is in a non-attainment zone with regard to air quality. The air quality of the County falls below the standards established by the US EPA. Rockland County is cited by the US EPA as a 'Currently Designated Nonattainment Area for All Criteria Pollutants' on the basis of having periods of time during which the air has excessive ozone levels and fine particulate matter of 2.5 micrometers or smaller. Health studies have shown a significant association between exposure to ozone and fine particles and heart or lung disease.

Plants and Animals

John Mickelson, Ecological and Geospatial Consultant, performed an extensive biodiversity study as a part of the composition of the 2009 Comprehensive Plan. Mr. Mickelson's study encompassed many elements, including hydrology, slopes, habitat potential, potential for animal and plant species, and recommendations for areas to be protected based on potential for existence of various plant or animal species.



Bloodroot Flower

Photo Courtesy of Joanna Galdone



Green Maple Leaf

Flora

The Mickelson study indicates that relatively small areas of undisturbed vegetative communities remain in the Town because of extensive development and conversion of natural woodland or grassland areas to residential uses (Figures 11 & 12). The study describes three general terrestrial groups, those being:

Forest, consisting of upland oak forest areas and forested wetlands comprised of a variety of deciduous varieties. The former are, as a result of development, limited to the outer fringe of the Town, while the latter are found in several large wetland areas which have remained more undisturbed or have been protected through the development review process. These areas currently contain high quality mature second growth hardwood with good size and age diversity observed. However, two concerns for the future of these areas are development and growth of invasive species and the uncontrolled deer population which will consume the lower successive plants necessary to the long term viability of these areas.

Grass and Shrub, composed of former farm, pasture and orchard areas formerly common to the rural and agricultural character of the Town. Intact grass and shrub areas are now limited to approximately 60 acres in five total parcels within the Town. The loss of these areas over time has undoubtedly reduced the populations of grassland birds and reptiles dependent on this habitat. Maintenance of these areas can serve to improve both the vegetative community and its habitat value.

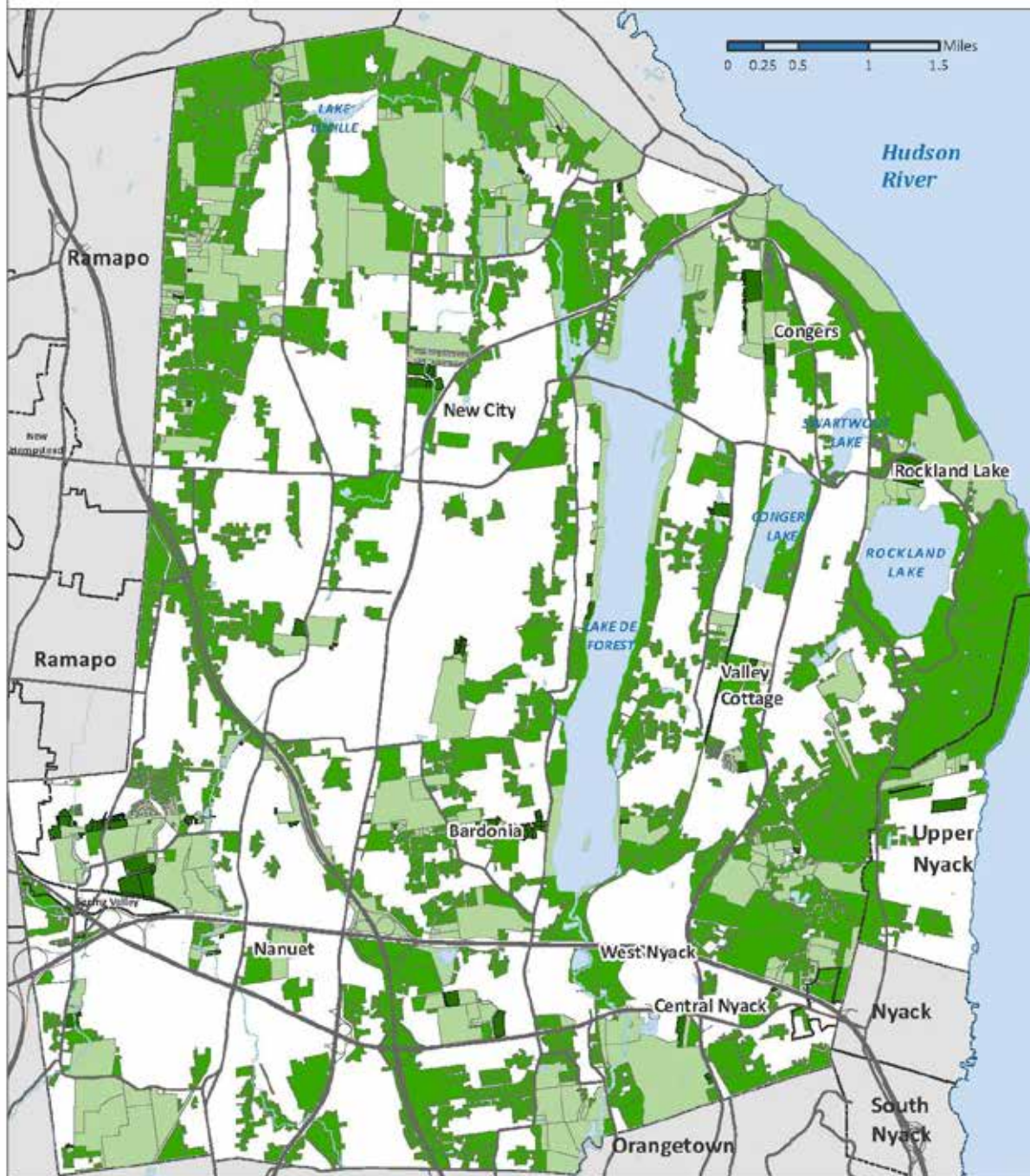
Crest, Ledge, Talus and Cliff areas, existing on the easterly and southerly perimeters of the Town along the Palisades Ridge formation. This area holds the highest potential for rare and endangered plant species, and has been designated as important by several agencies or organizations which are listed in the Mickelson report.

Town of Clarkstown, NY: 2021 Comprehensive Plan

Important Terrestrial Features - 2009 Clarkstown Biodiversity Study



- | | |
|---------------------------|---------------------------------------|
| Lakes & Streams | Agriculture, Grass, Shrub |
| Town & Village Boundaries | Forest, Agriculture, Grass, and Shrub |
| Major Roads | Forest |



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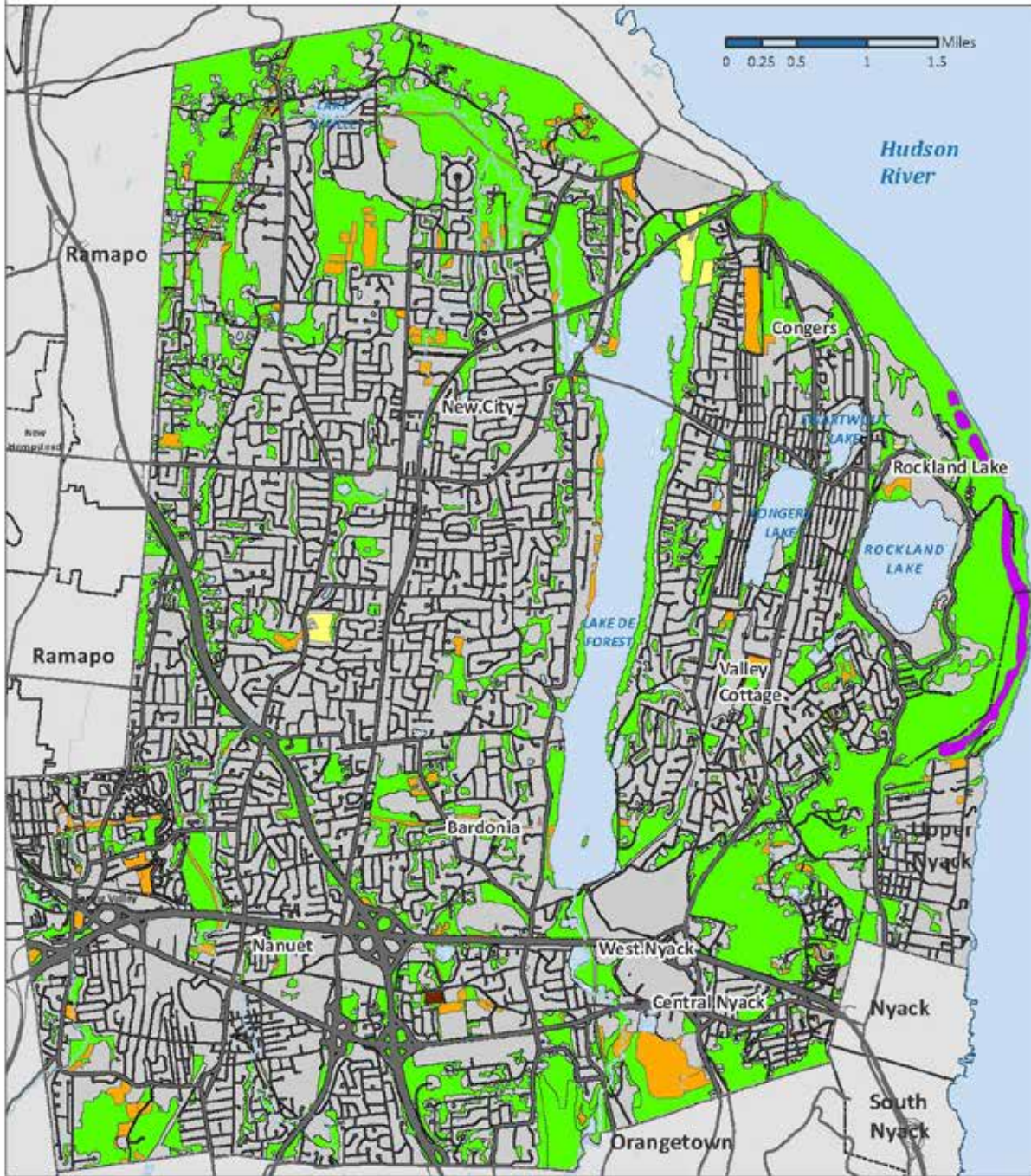
Figure 11

Town of Clarkstown, NY: 2021 Comprehensive Plan

Terrestrial Habitats - 2009 Clarkstown Biodiversity Study



- | | | |
|---------------------------|------------------------|-----------|
| Lakes & Streams | Agricultural | Barren |
| Town & Village Boundaries | Grass and Shrubland | Developed |
| Major Roads | Hardwood Forest | Roads |
| | Crest, Ledge, or Talus | |



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Figure 12

Mickelson also describes five aquatic habitat types (Figures 13 & 14), some of which are described above, and others that are particular more for habitat than vegetation:

Forested Swamp, described above as forested wetland, containing a variety of vegetation types, and being the predominant wetland type within the Town.

Scrub/Shrub Swamp, generally thought to be an early stage of forested swamp lacking woody canopy species of plants. Varied and numerous shrub species can be found, as well as herbs and ferns.

Emergent Marsh, characterized by low growing (1 to 3 meter heights) grass, herb and other plant species. These habitats can be found at the edges of forested or scrub/shrub wetlands, and can be found as independent areas such as the “Celery Farm” area in Congers.

Lakes and Ponds are a self-explanatory habitat area. Significant to those in Clarkstown is the high algae and aquatic vegetation growth found in many of the lakes due to nutrient enrichment. This is directly attributable to the run-off of excess fertilizers used in the suburban landscape.

Rivers, Streams and Riparian Zones. Streams and Rivers are also simple habitat areas, following the course of defined streams through the Town. Not as easy to envision are the riparian corridors as a whole, which include both the waterbody and the area adjacent to it. These riparian areas provide valuable functions for water quality and protection of the natural stream-side floral and faunal communities.

The complete description of the floral and vegetative communities of the Town can be found in the Environmental Resource Assessment prepared by Mr. Mickelson, attached hereto in the Appendix (Section V.B.). It is evident from that assessment that the development of the Town over the last 50 plus years has had a dramatic impact on the natural plant communities which once dominated the landscape.

In an effort to further preserve remaining natural forested areas within Clarkstown, the Town has updated its Tree Preservation Law originally enacted in 2007. Among other revisions, the update reduces the number of trees permitted to be removed without providing replacement trees and requires the planting of larger trees to replace mature trees taken down as part of residential or commercial development.

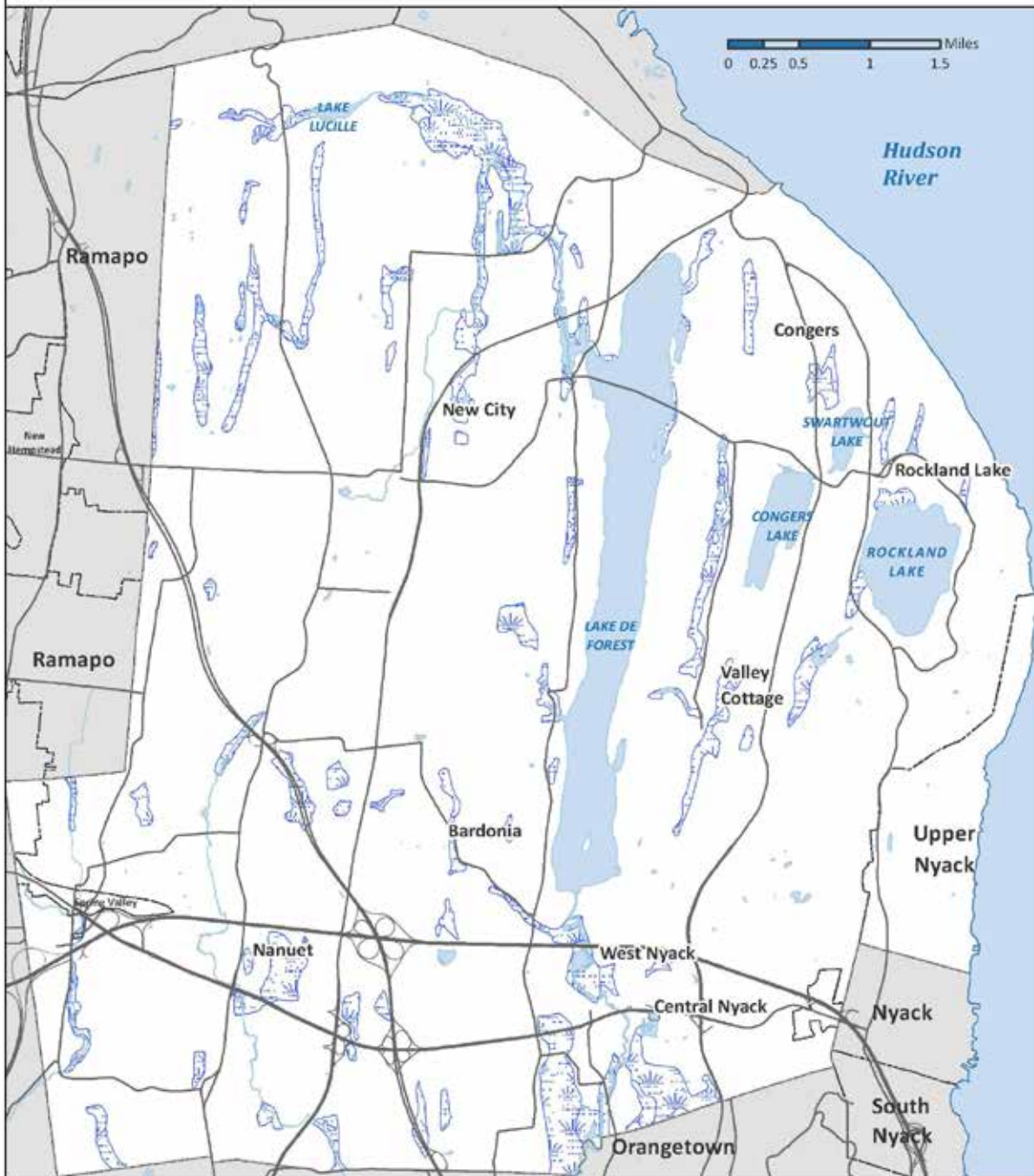
Management of invasive species will be implemented as part of the land development approval process undertaken by the Planning Board, as well as directly by Town personnel and equipment. The Planning Board and Technical Advisory Committee may require flora and fauna surveys for parcels which may be more likely to serve as habitat for invasive species. Removal of invasive species in accordance with NYSDEC guidelines will be incorporated into conditions required to be met by an applicant in order to receive site plan or subdivision approval from the Planning Board.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Hydric Soils

- Lakes & Streams
- Hydric Soils
- Town & Village Boundaries
- Major Roads



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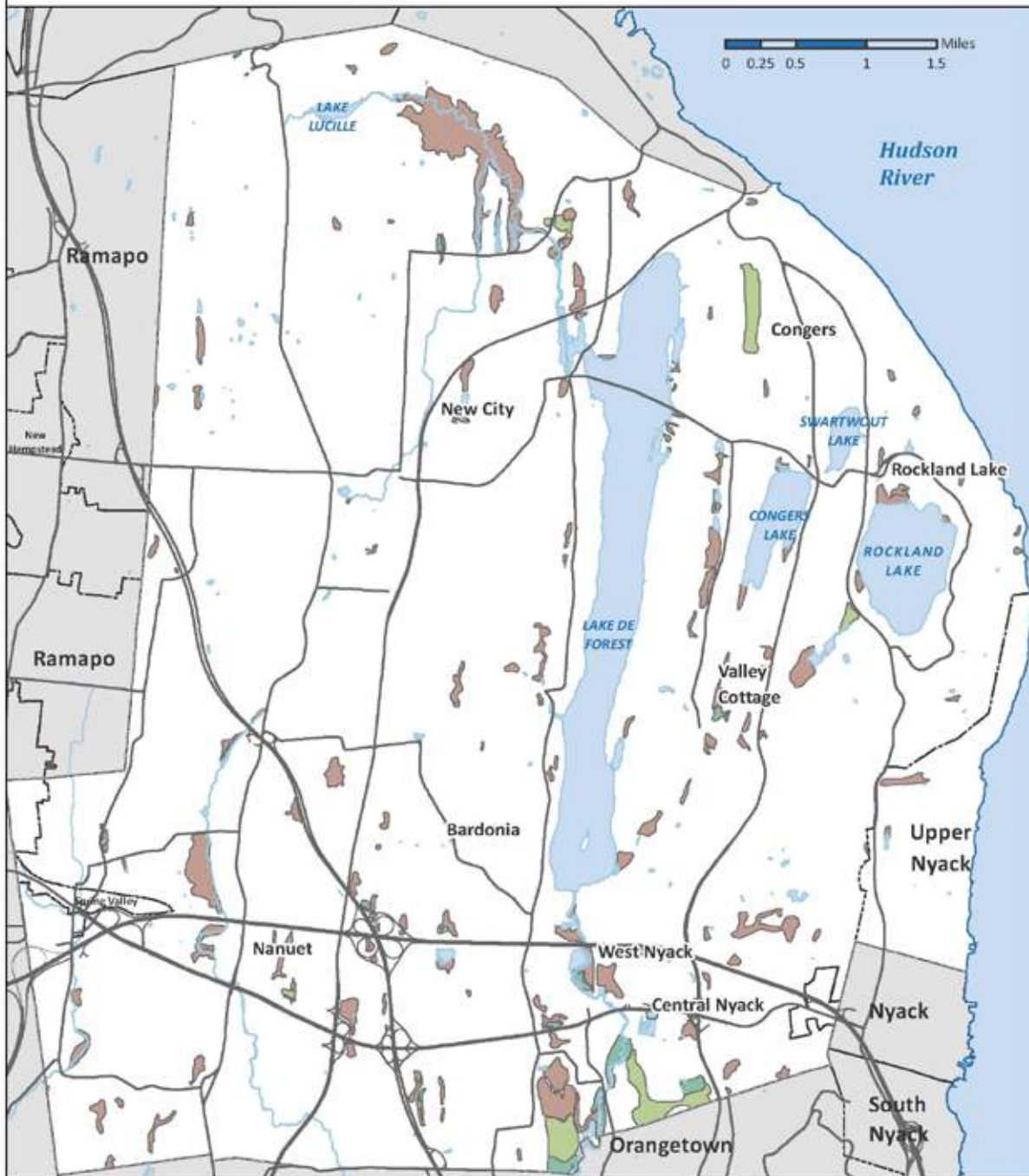
Figure 13

Town of Clarkstown, NY: 2021 Comprehensive Plan

Aquatic Habitats - 2009 Clarkstown Biodiversity Study



- | | |
|---------------------------|-------------------|
| Lakes & Streams | Emergent Marsh |
| Town & Village Boundaries | Forested Wetland |
| Major Roads | Scrub/Shrub Swamp |
| | Shrub Swamp |



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Figure 14

In addition to managing invasive species on parcels proposed for private development, the Town has initiated a program to remove several invasive aquatic plants from various Town-owned water bodies including Congers Lake, Twin Ponds and the Reginald Drive Pond, as well as several other stormwater ponds throughout the Town.

Fauna

Mammal populations within the Town are those that prefer access to a range of habitats and conditions, such as forest, forest edge and open fields. While there is little information on direct population counts, it is generally thought that these populations are relegated to the remaining undisturbed habitat areas around the perimeter of the Town. Some smaller or more adaptive species can be found within urban or edge habitats, such as squirrel, raccoons, and deer. While potential habitats for black bear and bobcat exist in the Town, it is not thought that breeding populations exist.

Data from several sources indicate that over 250 different bird species can be found in Rockland County. Based on Mickelson's assessment of habitat, he concludes that a majority could be present in Clarkstown. Of these, approximately 75 potential species are listed by the National and State Audubon Society as declining rapidly with small populations or limited range, or as declining or rare. Loss of habitat is one of the leading causes for the decline of these species.

Reptiles and amphibians are present in the Town, but the diversity of species is the lowest in the county. Habitats for most of these species are intact moist forest, field or wetland areas. These areas have been impacted by the development of the Town, by a combination of habitat loss, degradation of water quality by urban stormwater run-off, and changes in hydrologic patterns. Protection and improvement of available habitat would be essential to these species.

Surveys by NYSDEC indicate 20 different species of fish in lakes and ponds within the Town. Rare or endangered species have not been encountered over the past 30 years, and the potential for their existence in the Town is low. Threats to remaining fish populations include sedimentation of ponds and lakes, high "flash" storm flows, and nutrient enrichment of waterbodies which can lead to eutrophication, rapid growth of algae which deplete the water of oxygen.

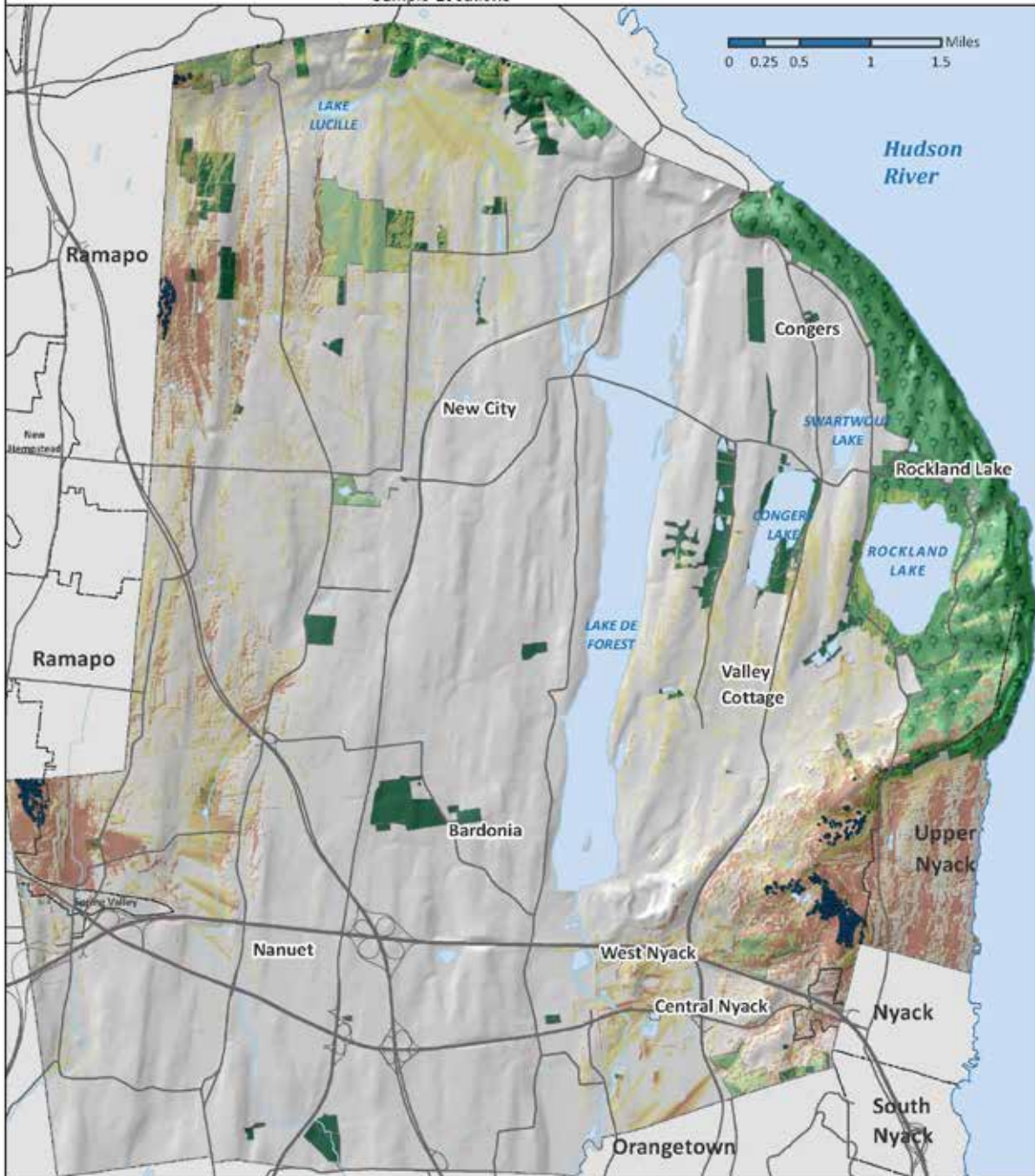
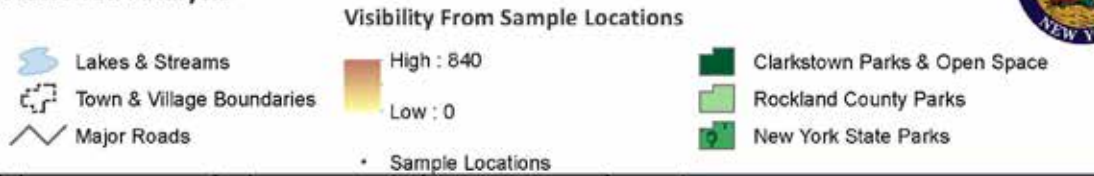
Aesthetic Resources

As the old saying goes, "beauty is in the eye of the beholder." For this reason it is difficult to determine what aesthetic characteristics of the Town might be most important to the diverse resident and business population which currently make up the Town overall. In addition, there are differing views on the aesthetic characteristics of the Town that are dependent on the length of time that the individual may have been living in Clarkstown. However, if the environmental elements are the yardstick for determination of aesthetic value, the task is simplified.

Views of the Town, from both within its borders and \ from surrounding areas are integral parts of the aesthetic value of Clarkstown (Figure 15). There are many areas of the Town which provide views of the surrounding Palisades Ridge.

Town of Clarkstown, NY: 2021 Comprehensive Plan

Viewshed Analysis



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Figure 15

Lake DeForest, Rockland Lake and Congers Lake are also major aesthetic elements adding to the attractiveness of the area. Several local roadways (e.g. the Central Highway overlook) provide wonderful views of the valley area of the Town, which from this vantage still appears to be a heavily natural wooded suburban area. In addition, there are scenic views from the several major roadways (PIP, NYS Thruway, Routes 59, 303 and 9W) which look toward the Ridge, across the Hackensack River, or provide a general view of the forested areas or fauna that make up the local landscape. The Long Path, a hiking trail extending from the George Washington Bridge to Albany, passes through the eastern part of Town, generally following the Palisades Ridge. This trail offers many views of the areas within Clarkstown, as well as spectacular views of the Hudson River.

However, the aesthetics of the Town of Clarkstown are not limited to the natural features or the views within or outside town boundaries. The Town developed from a rural farming community to a summer retreat from the proximate urban area, and finally to a suburban, residential and business community, each neighborhood having its character. There are many historic sites and structures in the Town, such as the Dutch House, Storms Tavern, the Davenport Property and many others. There are also many roadways which began as wagon paths, and still retain the fieldstone walls and stone culverts of the 1800's. Finally, the various hamlet centers, New City, Congers, Valley Cottage, West Nyack, Central Nyack, and Nanuet, all possess unique combinations of building styles and businesses which add to the diverse nature of the Town. Clarkstown has taken a lead position in protection of natural and aesthetic resources with its Open Space program, Tree Preservation Law, Hamlet revitalization projects, as well as zoning bulk reductions for wetlands, watercourse areas and steep slopes. The Town added the Hamlet Commercial District in 2011, which aims to reinforce and protect the existing historic character of the hamlets by encouraging renovation and new construction which is in keeping with the local historic scale and character. Historic design standards included in the code for this district ensure that any redevelopment or new construction will further enhance and complement the existing historic character of the hamlet. To further this objective, the Town will be looking at adding design standards for the MF zoning districts, which support multi-family housing development. As these developments are intended to be located in the dense portions of the Town's hamlets, the new design standards would piggy-back off of the design standards already in place for the HC districts.

Critical Environmental Areas

Critical Environmental Areas are specific areas having "exceptional or unique character" (6NYCRR Part 617.14(g)). Designation of Critical Environmental Areas must follow a detailed process of boundary identification, public notice, public hearing and notification to the NYSDEC and other review or regulatory agencies. To date the Town has not designated any CEAs. The benefit of designating a Critical Environmental Area is to strengthen the SEQRA review of projects, which requires that the potential impact of a proposed action on the particular characteristics of the CEA be thoroughly evaluated.

Quality of Life

Quality of life issues cause the greatest concern for residents in any area, but because of their very subjective nature are also the hardest to regulate or control. Generally, noise issues relate to residential uses abutting commercial or other business uses, where the commercial use noise level is affecting the residential use. The Town has a noise ordinance in place to limit both intensities and times of noise over certain limits. Redevelopment applications are reviewed for potential noise impacts, and in the past the Town has employed screening or buffers to prevent impact beyond the subject lot. Noise studies have been used in several instances during the site plan review process to ensure noise generated from new or expanded commercial uses will not adversely impact adjacent residential neighborhoods.

Dust complaints have also been addressed by the Town's enactment of soil and erosion control ordinances, which mirror the requirements set by the NYSDEC with regard to "fugitive" dust from construction sites. In addition, the Town Board has hired a consultant to evaluate dust generation from the mining and stone processing operations at the West Nyack quarry site. Again, it is difficult to measure direct contributions to dust generation, as it requires both upwind and downwind sampling to definitively isolate the source. For the most part, evaluations of dust issues are best handled on an inspection basis for fugitive dust from construction activities and on an individual complaint basis for other causes.

Odor again is a very subjective issue, and one for which it is difficult to establish parameters. The potential range of odors which might be encountered is far too wide to establish criteria, and odors do not make up a large number of complaints received by the Town. However, there are a number of land uses which do have the potential to generate significant odors, such as garbage transfer, composting, vehicle repair and several others. These uses impact different areas depending on climatic conditions such as wind direction.

While proper lighting is crucial for safety, excessive and unnecessary lighting can result in aesthetic issues and wastes energy. Additionally, improperly planned site lighting can result in impaired visibility for drivers as a result of glare. The Town requires lighting plans for all site plans which appear before the Planning Board to ensure the proper configuration of lighting on new developments. Issues of glare or excessive lighting are also investigated. Furthermore, the Town may consider additional legislation promoting lighting regulation as promoted by organizations such as the International Dark Sky Initiative to further protect against light pollution.

GOALS & OBJECTIVES

Land Resources

Protect Clarkstown's ridgelines. The various landforms in the Town add to its attractive semi-rural character. In particular, the Palisades Ridge is important to the viewshed both from within the Town and from the Hudson River and points east. A definition of ridgeline will be created and codified. Protections of the ridgeline will be implemented, including prohibition of the removal of wooded areas which would create an interruption in the appearance of the ridgeline,

and the construction of buildings or other structures which would change the appearance of the ridgeline. Mickelson's work has laid a firm foundation to define the ridgeline area, which can be seen on Figures 6 and 7. These exhibits also show that the ridgeline is defined by that point at which the steep slope of the embankment flattens to form the more level area at the top of the ridge. Using these two figures, it recommended that the ridgeline be defined as that area where the slope below the point is over 40% and the slope above the point is less than 15%, and including the area from that point to an elevation 20 feet lower. Using this formula the Town will enact legislation such as the Ridgeline Protection Model Ordinance developed by the Rockland Riverfront Communities Council.

Continue the acquisition of open space lands to protect sensitive environmental areas, as well as farmland. Open space acquisition will proceed according to the amended Town of Clarkstown Open Space guidelines as described in the Recreation, Parks and Open Space section. Open space will be used to protect high elevation areas (both hilltops and hillsides), steep slopes, wetlands, floodplains, riparian buffers, historic sites and scenic areas, as well as farmland. These areas will be surveyed to identify invasive species and a program will be developed for the removal of these species to ensure the long term viability of the habitats in these areas.

Continue enforcement of sediment and erosion control measures, both during and after construction. Protection of existing soils will also be a focus of the Town's efforts in the future. If needed, ordinances could be revised to lower thresholds for mandatory erosion controls, or to increase penalties for violations of those ordinances.

Water Resources

Protect and conserve both the sources and supply of potable water and the natural features which add to water quality. As the entire Town and County rely on surface and well water for water supply, and as the water cycle is wholly consumptive, it is imperative these sources be protected and utilized responsibly. Not only does this limited resource need to be protected at its source, but property owners must also work to avoid wasteful water usage.

Continue to enact limits on total development coverage for all zoning districts. The Town has enacted legislation regulating principal building and total lot development coverage in all of its residential zoning districts. Expanding this requirement will increase stormwater infiltration, increase well water supplies, and reduce total run-off to wetlands and watercourses.

Continue to require stormwater management to a higher extent than is currently applicable where development is proposed in watersheds which experience flooding. To protect both life and property, the Town now requires stormwater management to a higher extent than the currently applicable requirement that there be "no net increase" in stormwater flow from

the development and requires stormwater facilities that can handle 100-year storm events. The Town will continue to expand upon this legislation to protect against flooding and the impacts of unmitigated runoff.

Establish stream protection corridors. (Figure 16) These corridors will be protected from encroachment by adjacent development to maintain the natural buffers and shading of waters. This will serve to improve aquatic habitat by reducing the removal of shading vegetation and reducing stream warming detrimental to aquatic life. Stream buffer regulation will be established based on individual property conditions, recognized stream order, surrounding land uses, current best management practices and guidelines promulgated by recognized entities such as New York State Department of Environmental Conservation and the Center for Watershed Protection. Within these areas development will be limited, and natural areas will be maintained. Where existing watercourses have been impacted, re-development projects will be required to improve stream corridors by the installation of buffer areas or improvement of the stream area by plantings and other best management practices.

Enact a wetland protection ordinance (subject to the procedures required by State Law). It is crucial that the Town protect existing wetland areas from filling or other degradation which impacts the natural function of those wetlands in detaining run-off and providing water quality benefits.

Air Resources

Lobby for air quality monitoring in the Town and County. The predominant cause of reduced air quality in the Town of Clarkstown is vehicular traffic in and through the Town on major highways (NYS Thruway, NYS Routes 59, 9W, etc.) Through additional studies focusing on the sources and areas of concentration of this pollution, the Town can gain a better understanding of what steps can be taken to reduce the pollution.

Continue to coordinate with the New York State Department of Environmental Conservation regarding air emissions within the Town. These include general construction activities and the exposure of soils to wind erosion, and the mining and crushing operations of the Town's two mining sites. To address these causes, the Town will continue to enforce proper erosion control measures as required under Town Code Chapter 249A, and continue to monitor the Tilcon operations and work with that company to improve process methods to reduce generated dust.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Hydrological Corridors

- Lakes & Streams
- Hydric Zones
- Town & Village Boundaries
- Stream Corridor
- Major Roads



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Figure 16

Plants and Animals

Continue to require more detailed flora and fauna surveys during reviews of development proposals on properties which might contain species of concern. Protection of land and water resources as indicated above will provide some protections to natural habitat areas. The biodiversity study identified potential natural habitats that could support a diversity of animal and plant species. More detailed surveys are needed on properties as they are proposed for development to ensure both the protection of species of concern and the management of invasive species.

Continue the acquisition of open space to preserve natural habitats. (Figures 17 & 18) Preservation of habitat and potential habitat is critical to the continued viability of several plant and animal species within the Town, as well as the ability of those habitat areas to support transient migratory bird species. The Town will acquire properties that support biodiversity, habitat corridors and any Critical Environmental Areas established by the Town. The preservation of these areas not only benefits wildlife, but it also protects residents from potential hazards such as flooding. These lands will be surveyed to identify invasive species and a program for the removal of such species will be established to ensure the long term viability of the habitats in these areas.

Manage and remove invasive flora species, both terrestrial and aquatic. Invasive species can harm natural communities and systems by out-competing native species, reducing biological diversity, altering community structure and, in some cases, changing ecosystems. Through the purchase of several specialized pieces of equipment, the Town has initiated a program to remove invasive aquatic plants including Water Chestnut, Hydrilla, Milfoil, and pondweed from Congers Lake, Twin Ponds, Reginald Drive pond, and various other water bodies located throughout the Town. The Town will continue to require the removal of all invasive flora species on property proposed for development in accordance with the NYS DEC guidelines.

Aesthetic Resources

Protect wooded and natural areas from the removal of vegetation or other native materials which add to the character of the area. Clarkstown will not risk experiencing the replacement of hillside woodland areas with “McMansion” views like those visible from the Palisades Parkway Exit 13. The Town’s open space acquisition program has and can continue to be used to help in this effort, as can additional protections for sensitive areas, such as more stringent reductions in bulk area for slopes and wetlands and watercourses. The views from, and the Long Path itself, will also be carefully protected, to maintain the underlying purpose of that trail, celebrating the rich natural resource diversity which the area and particularly the Town has to offer. Where possible, the various Town land use Boards will be empowered to secure easements for the permanent location of the trail away from roadways and other less than ideal trail locations

Town of Clarkstown, NY: 2021 Comprehensive Plan

Primary Conservation Targets - 2009 Clarkstown Biodiversity Study



-  Lakes & Streams
-  Ecological Corridors
-  Town & Village Boundaries
-  Large, Intact Forest Blocks
-  Major Roads



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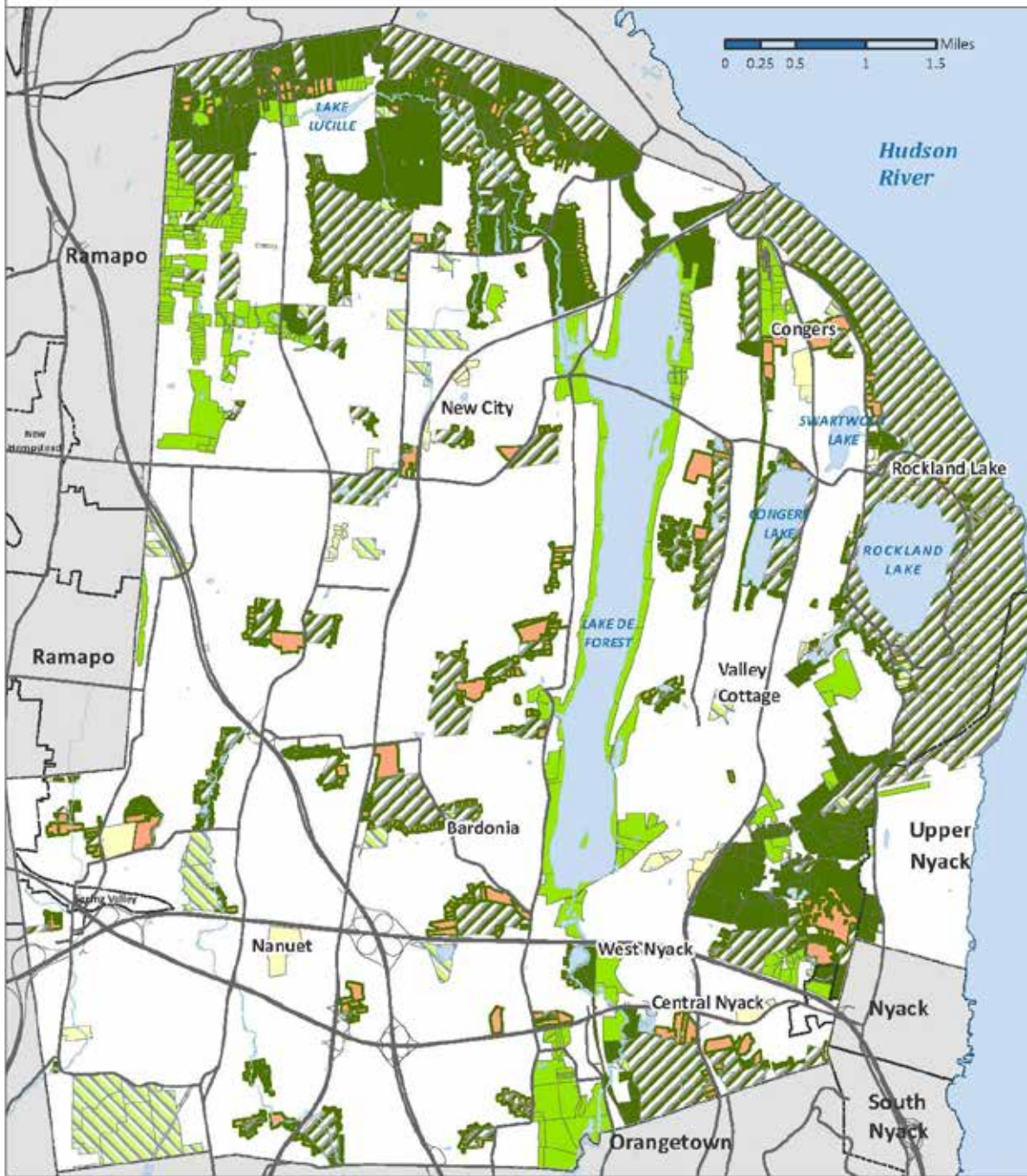
Figure 17

Town of Clarkstown, NY: 2021 Comprehensive Plan



Primary Conservation Parcels with Permanently Protected Lands

- | | | |
|---------------------------|--------------------------------|---|
| Lakes & Streams | Priority Conservation Parcels | Incidental Conservation Parcels |
| Town & Village Boundaries | Secondary Conservation Parcels | Edge/Adjacency Parcels |
| Major Roads | Valuable Conservation Parcels | Permanently Protected: Town, County, or State |



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Figure 18

Preserve the suburban and remaining semi-rural character of the Town. A sense of community has been an integral part of the development of the Town, enhancing the Town's attractiveness to potential new residents and businesses. This includes maintaining density of existing developed residential areas, or where increasing density is warranted (i.e. active adult or volunteer housing) enhancing the appearance of new development or screening the new development to lessen its impact on the surrounding area.

Implement design standards for future construction. Development does not have to detract from the aesthetic nature of the Town; the needs of businesses and industry can be served without destroying the character of the Town. As such, additional design standards, such as the use of earth-toned materials, will be considered for areas throughout the Town. Recently the Town has attracted several commercial projects which have utilized materials superior to typical commercial construction. These projects have even elevated the aesthetic level of major highways along which they are located.

Critical Environmental Areas

Designate Critical Environmental Areas in Clarkstown. This action may provide benefits beyond those achieved by zoning and land use regulations alone. While the latter apply directly to a particular parcel proposed for development, the former can establish a framework for more detailed review of the potential development impact on areas which are not closely proximate to the development. For example, the area of the Hackensack River in West Nyack is prone to chronic flooding due to high storm intensity. If the Hackensack River area were designated as a Critical Environmental Area, any development in the Hackensack River Basin would be subject to a more extensive review of potential impacts on stormwater contributions to that area under the provisions of SEQRA. This would assure that cumulative impacts of development over a wider area would be evaluated, and would allow the Town to implement additional regulations to avoid the exacerbation of existing conditions. Similarly, the designation of the Palisades Ridge would raise the level of review for any proposed project affecting the characteristics of the Ridge, adding a level of protection to the existing views, and to important vegetation and habitat areas which are detailed in the Environmental Resource Assessment. Major wetland areas might also benefit from the additional designation, allowing more detailed review of water quality and habitat impacts. Areas with the potential for high biodiversity, particularly the island at the southern end of Lake De Forest, which is home to a wide diversity of bird species, will also be designated. In conjunction with the identification and designation of Critical Environmental Areas, the Town will also consider the designation of Environmentally Sensitive Sites and Features, as was done in the Village of Piermont.

Quality of Life

Continue investigation of and action against complaints of noise, dust, odor and light pollution. Noise issues will be dealt with on an individual basis as they are now. For existing facilities, or those over which the Town does not exercise land use review, noise complaints can

be evaluated under the Town's noise ordinance. Consultants can be retained to perform necessary studies.

Dust concerns will continue to be addressed under the provisions of the Town's soil and erosion control ordinances. Penalties for failure to conform to the ordinance requirements will be strengthened to provide a greater incentive for compliance. Consultants may be retained by the Town as needed to evaluate individual situations.

Odors are generally too varied and transitional to establish hard parameters or standards for review. It is best to treat odor issues when they are raised via complaint. Further, the Rockland County Health Department currently addresses issues related to air quality including odors, and that agency will continue to investigate odor issues and determine whether the particular situation investigated rises to the level of nuisance which would mandate corrective actions.

Light emissions will continue to be reviewed during the site plan approval process, and complaints of light pollution will be investigated. The Town will also explore new regulations and organizational partnerships to enhance protection against the negative impacts of excessive and problematically designed lighting installations.

Continue to assess the potential for noise, dust, odors and light pollution in projects under review; require the elimination or mitigation of these pollutants as a condition of approval. Reviews by land use Boards of potential nuisance-generating uses will require studies to establish baseline conditions, with subsequent studies to determine actual impacts after the proposed facility is in full operation. Boards will also establish the range of additional mitigation measures prior to the final approval of such a project.

c) Health, Safety & Welfare

SUMMARY OF SERVICES

The Town of Clarkstown benefits from a robust and dedicated system of emergency services and facilities. Many of these services are provided by volunteers from the community. Figure 19 shows the locations of the Town's police, fire, and ambulance facilities.

Police

The Clarkstown Police Department provides protection throughout the Town of Clarkstown and portions of the Villages of Nyack and Spring Valley. The Police Department is currently comprised of 156 police officers and 70 civilian employees.



Clarkstown Police

Fire

Ten volunteer fire departments provide protection throughout their individual districts within the Town of Clarkstown. These departments often rely on one another for mutual aid.

Rockland Lake	Nanuet
Valley Cottage	Central Nyack
Congers	Hillcrest
New City	East Spring Valley
West Nyack	Nyack Joint

Ambulance

Five volunteer ambulance corps provide emergency service within the Town.

Congers/Valley Cottage Volunteer Ambulance Corps
New City Volunteer Ambulance Corps and Paramedic
Nanuet Community Ambulance Corps
Nyack Community Ambulance Corps
Spring Hill Ambulance Corps

In addition, several private ambulance services are in operation in the Town.

Rockland Paramedic Service
New Hempstead Ambulance
Village of New Square Emergency Service
Rockland Ambulette Service

Hospitals

There are no hospitals in the Town of Clarkstown. Two hospitals are located within Rockland County in close proximity to the Town.

Nyack Hospital – Nyack (~1.0 miles)

Good Samaritan Hospital – Suffern (~5.0 miles)

Other Services and Facilities

In addition to the Clarkstown Mini Trans, paratransit is provided by Rockland County via T.R.I.P.S. (Transportation Resources, Intra-county, for Physically disabled and Senior citizens). This bus service provides curbside pickup for physically and mentally challenged individuals throughout the County. Rockland County also offers an array of health services at locations throughout the County. These services include immunization, infectious disease, pediatric, mental and women's health clinics, as well as a number of other programs focusing on the health of Rockland County's residents. Their main facility and department offices are located at the Robert L. Yeager Health Center in Pomona.

STATE OF SERVICES

Consideration of emergency services must continue to play an important role in the site plan development review process. It is crucial that sites be developed in a manner that allows for proper access of emergency vehicles and personnel. Irregular site and subdivision layouts, such as flag lots, can impede emergency access and should be discouraged. Through the distribution and review of development plans and proposals, unsafe designs and obstructions to emergency access can be removed and potentially dangerous situations avoided.

With a large transportation network and several high volume county, state and federal highways, the Town of Clarkstown must constantly assess and address transportation safety issues. As part of the Comprehensive Plan, a detailed transportation study, the Town of Clarkstown Comprehensive Transportation Plan, was created. This study offered a series of recommendations to improve pedestrian, bicycle and automotive safety throughout the Town. Portions of this study and its recommendations on transportation safety issues are reflected in the Transportation section of this Comprehensive Plan. The full Comprehensive Transportation Plan is located in the Appendix (Section V. H.).

Volunteer emergency service participation in Clarkstown is at risk. As the demand for fire and ambulance service has increased, the number of active volunteers in these organizations has diminished. The high cost of housing has made the Town of Clarkstown unaffordable for volunteers. Specific goals and objectives for the creation of additional housing can be found in the Housing section of this Comprehensive Plan.

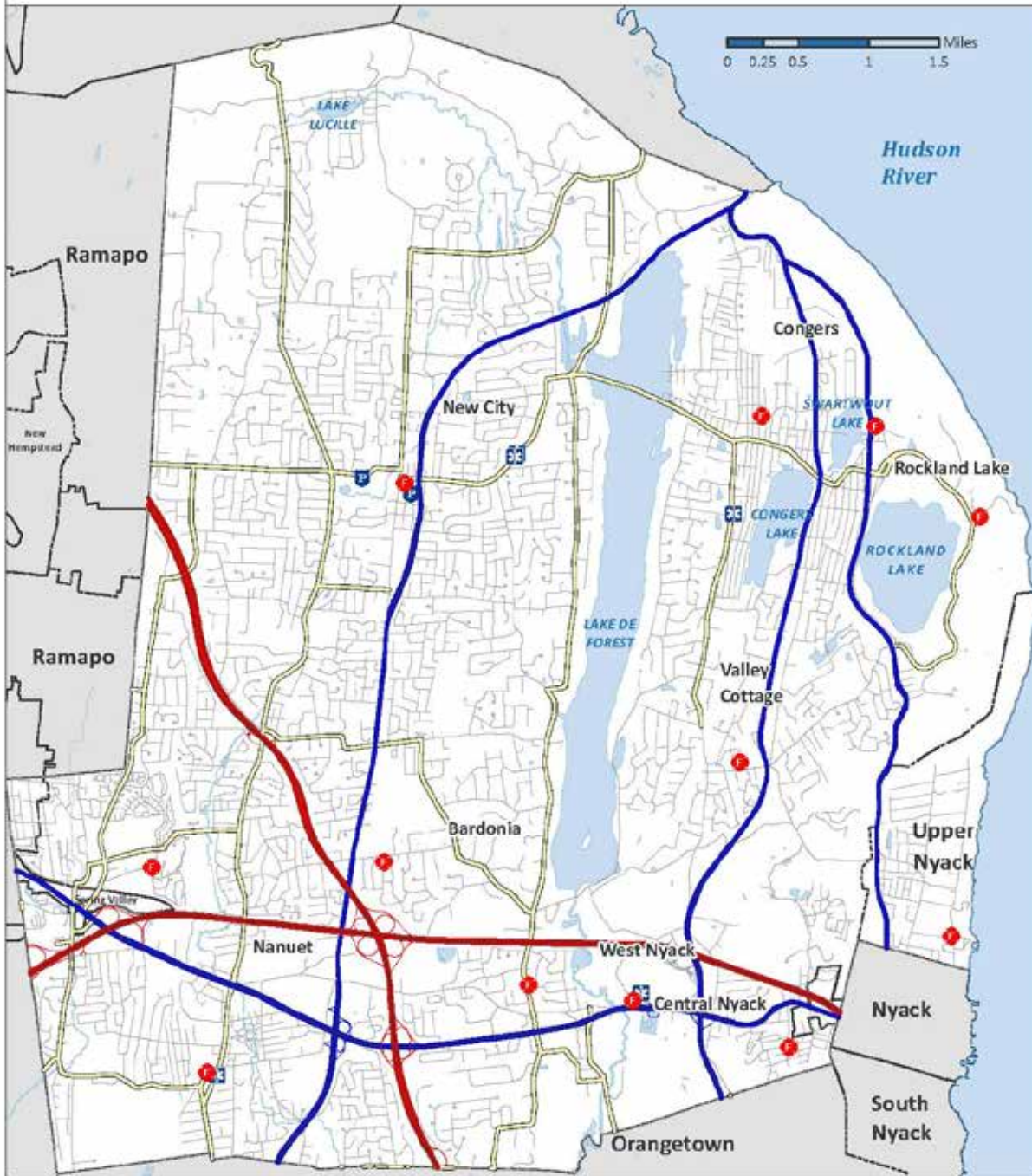
Clarkstown's population is not only growing, but aging, causing an increased demand for certain emergency services and healthcare infrastructure. It is crucial that the Town remain attentive to current demographic trends and projections to preemptively address the impacts of such change in the demand for these services.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Public Health

- | | | |
|---------------------------|--------------------|----------------------------|
| Lakes & Streams | Interstate Highway | Fire House |
| Town & Village Boundaries | State Highway | Emergency Medical Services |
| | County Highway | Police Station |
| | Local Road | |



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Figure 19

GOALS & OBJECTIVES

Emergency Services:

Ensure the efficient provision of emergency services. The commercial and residential growth and development in the Town has created specific situations where providing police, fire, ambulance and other emergency services may be hampered or delayed because of obstructions or inaccurate address information. The Town will remove obstructions, such as curbing or poles, by working with the responsible parties. The Town will work to improve address information sent to 911 through the use of its GIS system. The Town will also continue to participate in the Rockland County Radiological Emergency Preparedness Plan, which has a traffic management plan for the Indian Point Energy Center, and continue to use the Ready Clarkstown public notification system to notify residents as needed. Clarkstown will work to have its emergency services regularly coordinate evacuation and other security plans and policies with other town, county, regional, state and federal emergency agencies.

Create a mechanism for providing tax relief to volunteer emergency service personnel. Many members of Clarkstown's volunteer fire and emergency departments are having difficulty affording the high cost of housing in the town. Also, younger individuals, who make up a substantial portion of the active membership in these organizations, are moving out of the Town upon high school and college graduation to escape these costs. In the 2008 Student Community Survey housing incentives, including tax breaks, were shown to significantly boost interest in the town's volunteer emergency services.

Zoning/Building Code Development and Enforcement:

Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced. All site plans and subdivisions approved by the Planning Board are reviewed by the Fire Inspector for compliance with the building and fire codes before being endorsed by the Chairperson of the Planning Board. This practice will be continued; however, commercial and residential growth may outpace the current building and fire codes and may require increased enforcement efforts to protect resident safety. Town building and fire codes will need to be updated and regular enforcement increased.

Continue to develop zoning and building regulations that reduce and eliminate potential drainage or flooding problems resulting from new construction. New commercial and residential construction, by its very nature, will, if left unchecked, create conditions that either exacerbate existing drainage and flooding concerns or create new ones. The cost to the Town and the tax payer of addressing and resolving those concerns after construction to protect the property and safety of residents is far more than the cost of addressing those concerns through preventative measures at the time of construction. Zoning and building regulations will be

developed to ensure that site plan and subdivision designs reduce and eliminate potential drainage or flooding problems.

Develop zoning and building regulations, and implement roadway changes that reduce or restrict odors, sounds, light pollution, commercial traffic and other negative environmental impacts on residential areas. In order to maintain a high quality of life for the town's residents, land use regulations must be applied in a manner which considers the adverse impacts one use may have upon another. Zoning and building regulations will be developed, and roadway changes implemented, to ensure that incompatible uses are properly located to avoid any such conflicts.

d) Historic & Cultural Resources



Cropsey Farm

Preservation of Clarkstown's valuable historical resources and support for current cultural organizations and activities will be a shared responsibility between the public and private sectors of our community. A very modest investment on the part of the Town can yield a great return in civic pride and maintenance of the Town's historical importance as well as providing education to the community as a whole. Ensuring that proper protective measures are in place to preserve those areas which stand as totems in Clarkstown's rich historic timeline is essential to the preservation of the Town's unique identity. In addition, the Town is committed to partner with local and regional historic

organizations to assist with educational programing on the history of the Town, its historic assets and the history of the area's indigenous peoples.

There are currently thirty-three sites in Clarkstown that have been designated by the Clarkstown Town Board as historic (Figure 20 – numbers on map correspond to Table 3). The list of those sites appears below:

Table 3
Town of Clarkstown Historic Sites

#	Site Name
1	John William Hill House
2	Coe Homestead
3	Haramus Tallman House
4	Henry Varnum Poor House
5	Solon House
6	Cushner House
7	John Van Houten House
8	Melvin Knapp House
9	Blauvelt-Secor House
10	Smith-Gilchrest House
11	Mount Moor Cemetery
12	Bardon Farm
13	Jacob Blauvelt House
14	Blenker-Vanderbilt-Duffy Barn
15	Dutch Garden
16	Roberts Farmhouse
17	DePew House
18	James Blauvelt House
19	Martinus Hogencamp Cemetery

20	Germonds Rd Cemetery
21	John Storms House
22	J. Stephens House (Teaberryport House) <i>structure removed</i>
23	Joseph Turnure House and Barn
24	Schueler-Paul House
25	Ice House No. 3
26	Johannes Snedecker Farmhouse
27	Major John Smith Barn
28	Blenker-Vanderbilt-Duffy House
29	Demarest - Evans House
30	Tournier-Debaun Grist Mill and Mill Tender House
31	Talman-Budke and Vanderbilt-Budke-Traphagen Houses
32	Cropsey House and Barn
33	Onderdonk-Tallman-Budke House

In addition to the Town designated historic sites, the following sites in Clarkstown have been designated on the National and State registrars: First Methodist Episcopal Church of Nyack (a.k.a. Old Stone Church) in Upper Nyack; Hook Mountain and Nyack Beach State Parks; Upper Nyack (National Natural Landmark); Palisades Interstate Parkway; Palisades Interstate Park System (National Natural Landmark); Rockland County Courthouse in New City; The Cropsey House and Barn in West Nyack; Upper Nyack Firehouse (a.k.a. Empire Hook & Ladder Company, No. 1) in Upper Nyack; and Van Houten's Landing Historic District in Upper Nyack.

The Town has also designated a number of roadways in Clarkstown as historic (Table 4). A certificate of appropriateness is required before work can commence on any designated historic road or portion thereof. This certificate is granted by the Town Board based upon the advisory recommendation of the Clarkstown Superintendent of Highways and the Architectural Historic Review Board.

Table 4
Town of Clarkstown Historic Roads

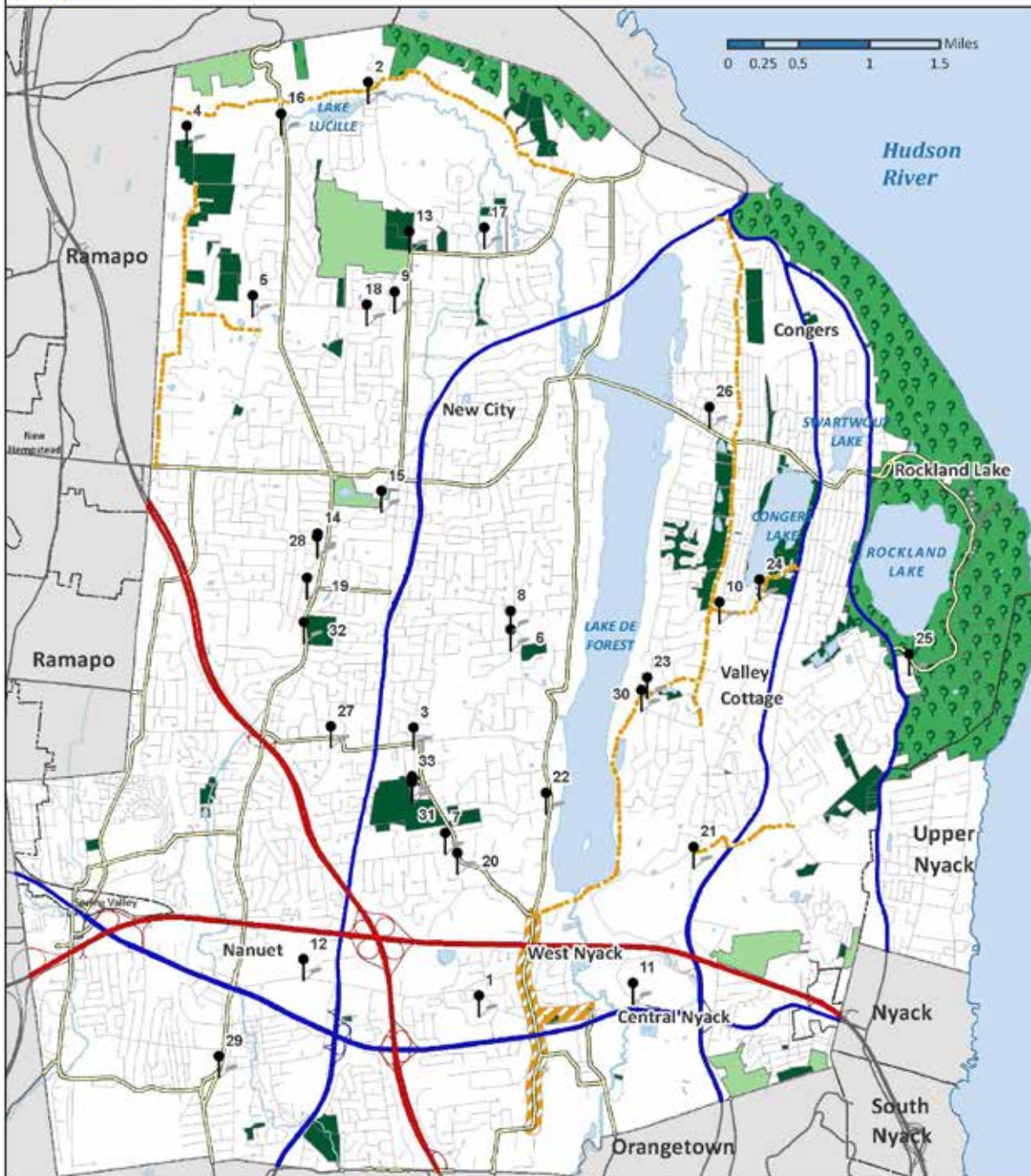
#	Road Name
1	Buena Vista Road
2	Old Mill Road
3	Kings Highway
4	Old Haverstraw Road
5	South Mountain Road
6	Storms Road
7	Old Phillips Hill Road
8	Gilchrest Road

Town of Clarkstown, NY: 2021 Comprehensive Plan



Historic Sites, Roads & Areas

- | | | |
|---------------------------|--------------------|-------------------------------|
| Lakes & Streams | Interstate Highway | Historic Roads |
| Town & Village Boundaries | State Highway | Clarkstown Parks & Open Space |
| Historic Sites | County Highway | Rockland County Parks |
| Historic Areas | Local Road | New York State Parks |



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Figure 20

The Clarkstown Town Board authorized the creation of the Historical Review Board when they approved Local Law #9 in 1967. This law went through slight modifications in 1967, 1974 and 1996. The purpose of this local law was to preserve the historical character of certain areas to be designated within the Town of Clarkstown and to prevent the impairment of or injury to their architectural and cultural value. The law allowed a reasonable degree of control over the architectural design, construction, alteration and repair of buildings, signs or other structures erected at designated historic areas. This was done so that these buildings and structures would remain in harmony with the style and spirit of the historical property presently situated there. The Historical Review Board has since been reorganized into the Architectural Historic Review Board.

Maintaining and updating information on the Town's list of historic and cultural resources is an important part of their upkeep and protection. While the Town's historic sites, areas and roadways are now catalogued in the Town's GIS system, an expanded database will be established to collect additional information on historic sites and cultural organizations and programs within the Town. Access to information on the historical background as well as ownership and condition of these sites is a key element to their upkeep. This database will be integrated with the Town's Geographic Information System (GIS) to alert Town personnel involved in building and development when a historic site may be affected by a project. Information on the Town's cultural institutions and organizations can be maintained in a similar manner.

During an analysis of potential historic sites within Rockland County, the Rockland County Historical Society identified 299 potential sites within the Town of Clarkstown. These sites will be further investigated by the Town to examine their actual historical significance for possible addition to the Town designated list. Furthermore, any site determined to hold historical significance will be documented and added to the aforementioned historic database.

Since the adoption of the 2009 Comprehensive Plan, the Town has designated 3 additional Town historic sites. In 2011, the Town purchased the property containing the Talman-Budke and Vanderbilt-Budke-Traphagen houses. Since then an extensive restoration projection has taken place to restore the Tallman-Budke house and the site now hosts the annual Heritage of West Nyack Fall Festival. The Cropsey House and Barn was designated a Town historic site in 2015, and added to the National Register of Historic Places in 2017. The historic barn on the property has since been fully restored. The Town has also worked to follow the commitment made in the 2009 Comprehensive Plan to care for its historic cemeteries. Upkeep is now carried out on several sites, and most recently the Town acquired the Nyack Rural Cemetery, which it now maintains.

To protect the Town's historic resources, proper legislation must be in place. New historic preservation laws have been introduced since the adoption of the 2009 Comprehensive Plan in response to the recent losses of some very important historic properties in Clarkstown and the near loss of the Storms Tavern in Valley Cottage. These new laws have provided the Town Board and the Architectural Historic Review Board with additional tools to ensure that the important historic sites that showcase Clarkstown's rich history will be here for future

generations to enjoy. The Town will remain vigilant in its dedication to historic preservation, and continue to pursue such legislation as necessary.

Education and promotion of Clarkstown's historic and cultural resources increases awareness and stresses the importance of these community assets. The comments received at the Religious and Cultural Outreach meeting emphasized the promotion of these resources. The Town may consider dedicating a location on its website for such uses. The Town will also encourage its local historical societies to make efforts to provide their knowledge to local school districts for incorporation into the school curricula.

GOALS & OBJECTIVES

Identification:

Identify and maintain an up-to-date inventory of historic resources. The current historic property list will be cross referenced with the County Historical Society's list of 299 potential historical sites in Clarkstown. The list will also be compared with State and Federal government information to ensure inclusion and accuracy. The Architectural Historic Review Board must develop a formal nomination process for officially designating historic sites.

Preservation, Protection and Partnerships:

Expand upon legislation to ensure that historic roadways, and those historic properties in private hands are not destroyed, or so renovated by subsequent owners as to lose their historic status. The new Historical Preservation Law will provide the Town Board and the Historic Review Board with the ability to protect and preserve the Town's most important historic sites and roadways.

Establish a mechanism which notifies the Architectural Historic Review Board when development is proposed on a historic property. The Town Geographic Information System (GIS) will be used to develop integrated work flow processes between and among departments in the Town that automatically notifies the Architectural Historic Review Board when a permit of any kind is requested for a designated historic site. Preservation planning will be integrated throughout all the other necessary departments within the Town to ensure that no significant site is destroyed through lack of information. Applications for permits that in any way alter the identified structures will require oversight by the Architectural Historic Review Board.

Restoration:

Establish a plan to improve the maintenance of all publicly owned historic properties and abandoned cemeteries within the Town. The newly formed Department of Engineering and Facilities Management has been given the responsibility for maintaining these properties. The

department will need to be provided an adequate annual budget to do so. The Town may also consider adopting a vacant and abandoned buildings ordinance where the Town can condemn property and resell it in an effort to have it restored. The Town will consider creating partner programs to help finance needed restorations and improvements such as matching grants or low interest loans for designated historic sites.

Education:

Communicate, promote and educate Clarkstown residents about the historic and cultural resources of the Town. Information on designated historic sites will be displayed on a plaque at the site, posted on the town web-site, maintained on the Town and County's Geographic Information System (GIS) and shown on the Town Zoning Map. The Town's website will provide detailed historical descriptions of designated sites throughout the Town. The Town will continue its partnership and support with local organizations, such as the Congers Civic Association, Heritage of West Nyack and the Rockland County Historic Society, to promote educational programming on the history of the Town, its historical sites and indigenous peoples. The Town will also work with school districts to encourage field trips to historic sites and to add a local history component to their syllabi. The Town's website will provide a listing of all the Town's cultural organizations.

The Town will consider legislation to create an "Arts in Public Places" program similar to that of the County whereby a certain percentage of all Town capital project expenditures, up to a to-be-determined reasonable limit, would be set aside to finance the creation and placement of public art. The Town will create an Arts Council responsive to the Town Board to advise it in supporting the arts.

e) Housing

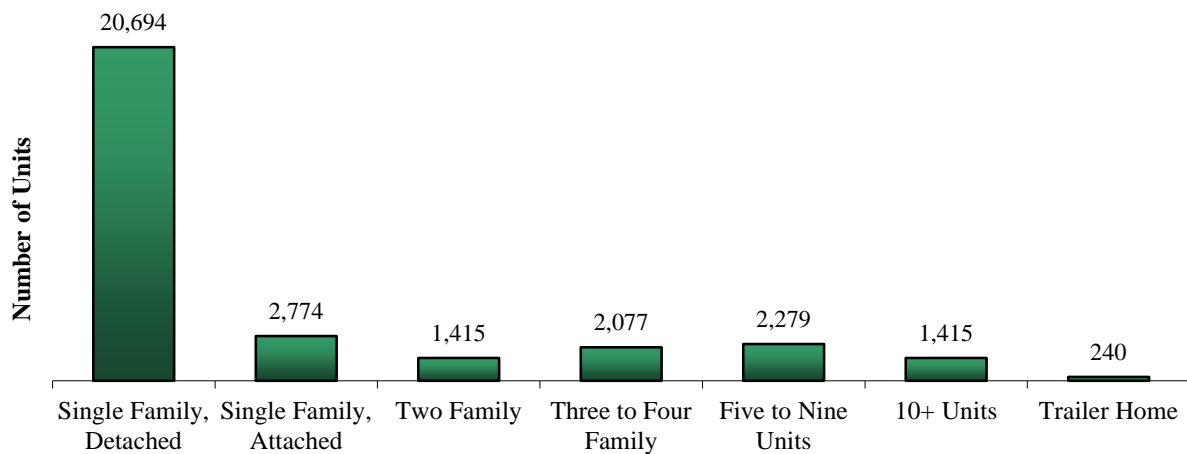
The 2020 U.S. Census Bureau American Community Survey (ACS) population estimate for the Town of Clarkstown is 88,155 persons. This population resides in approximately 31,000 households spread among a number of diverse housing types (Chart 4). About 24,000 housing units are owner occupied, while about 7,000 are renter occupied. Clarkstown's proximity and accessibility to New York's Metropolitan Area was a driving force in the large scale housing development of the 1970's and 1980's which formed the core residential component of the Town. Regional prosperity is evident in the income trends for the Town and County, and has led to housing prices which are difficult for all residents, both current and potential, to afford. As older residents consider new housing for retirement, and Clarkstown's youth begins seeking housing of



The Hamlets, Nanuet

its own, the Town's housing stock offers limited affordable housing options. Moreover, vacant land has become a scarce resource within the Town and solutions for dealing with current housing issues will need to focus more on areas already developed rather than unoccupied lands. Awareness of Clarkstown's distinctive neighborhoods and places must be applied as new housing initiatives are undertaken, as it is these spaces that make the Town unique. With care, the Town can provide for a wider range of housing alternatives integrated into its existing spaces in a manner that not only addresses a need, but creates a better community.

Chart 4
Town of Clarkstown
Housing Characteristics: 2020
(Source: EASI Demographics 2021)



Since 2010, the Town's population grew 4.71 percent from 84,187 in 2010 to 88,155 in 2020 and is forecasted to grow 2.46 percent by 2025. As the Town's population expands and ages (Chart 5), new housing types are needed. Older individuals may seek smaller residences, often within housing communities, and may find their options restricted as they rely on fixed incomes. On the other end of the spectrum, younger persons may find their housing options limited as they begin establishing careers. Between these groups are also a large number of workforce families contributing an extensive portion of their income to housing costs; if alternative housing types are not available, portions of the Town's population will be unable to remain. Clarkstown is a diverse community, comprised of persons from a range of races and ethnicities. Chart 6 illustrates this composition, and shows that, in general, the Town's breakdown of race and ethnicity is very similar to that of the nation. Ensuring that a wide range of housing options exist to suit the needs of current and future residents must be a high priority for the Town of Clarkstown as the state of housing is directly linked to the vitality of the Town.

Chart 5
Town of Clarkstown
Age Distribution: 2020
 (Source: EASI Demographics 2021)

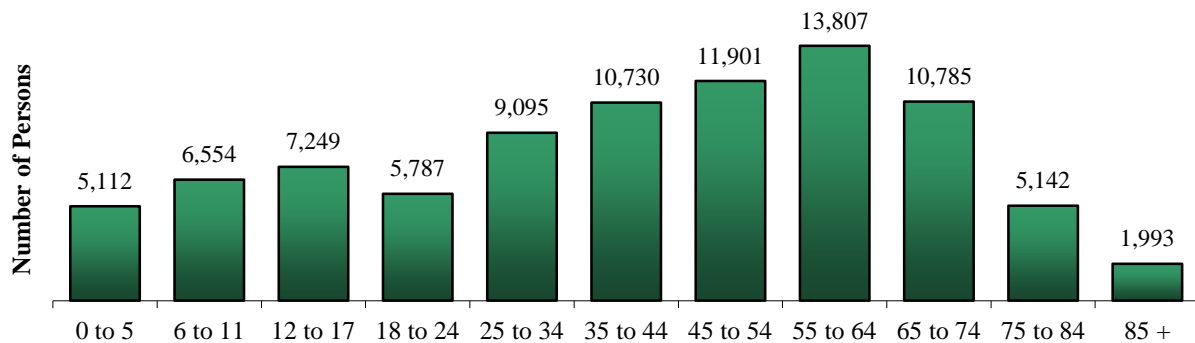
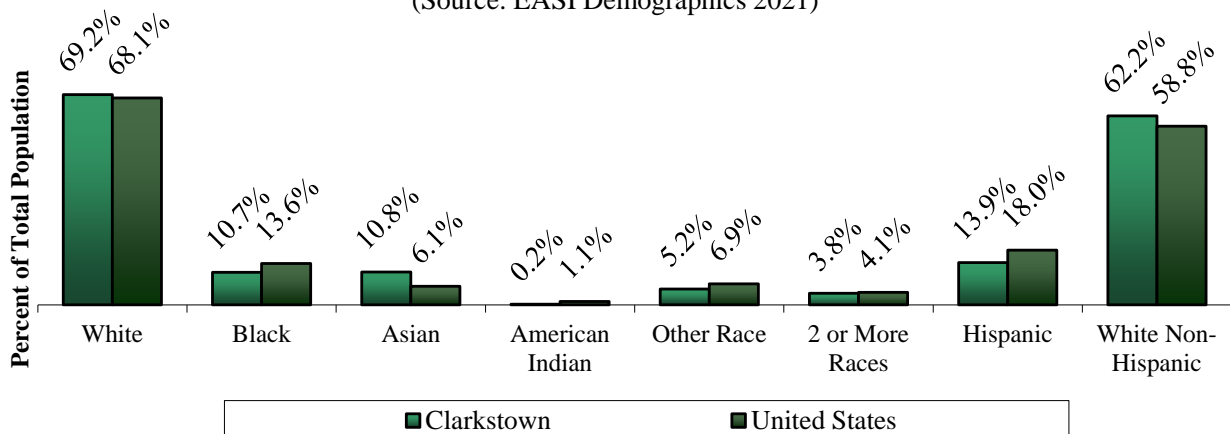


Chart 6
Town of Clarkstown
Racial and Ethnic Composition: 2020
 (Source: EASI Demographics 2021)

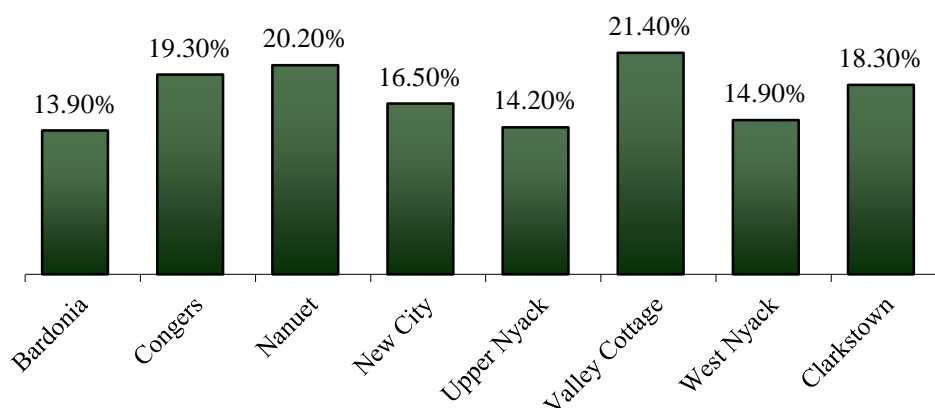


Affordable Housing

The Town of Clarkstown Economic Development Strategy prepared by Saratoga Associates in 2008 contains an analysis of middle income households in the Town of Clarkstown (Chart 7). The study examined those households earning between 80% and 120% of U.S. Housing and Urban Development - Area Median Family Income (HAMFI). Within Rockland County this range includes those households which earn between \$57,040 and \$85,560 per year. In the Town of Clarkstown there were found to be 5,300 households earning a yearly income within this range. The Saratoga Associates study further concluded that in no area of Clarkstown was the median home price low enough for a middle income household to reasonably afford, thus these households would theoretically need to rely on the limited rental housing market and spend more for housing than is fiscally prudent. The study found median rental prices compatible with middle income households in all but the hamlets of Bardonia, Nanuet and West Nyack. At the time of this study in 2007, Clarkstown's median household income was \$116,607 and the median home value was \$519,000. This was at the height of the housing market right before the 2008 recession. According to the ACS, in 2020 the Town of Clarkstown's median household income increased to \$134,987, while the median home value decreased to \$458,417. It would appear that the affordability gap is narrowing, but these numbers do not account for the effects of COVID, which has negatively impacted incomes, while simultaneously increasing demand for suburban housing, driving housing prices up. The NYC Planning Department recently analyzed Zillow provided housing data and determined that median list price for Rockland County houses was over \$500,000 (see Appendix Section V.S.).

Chart 7
Households earning between 80% and 120% of the HAMFI,
Town and Subsets of Clarkstown; 2007

(Source: 2007 HUD-Area Median Family Income; EASI Demographics - Saratoga Associates Town of Clarkstown Economic Development Strategy)



In September of 2002 the Citizens Advisory Board for Housing in the Town of Clarkstown completed its Final Report in which the state of the Town's housing situation was carefully analyzed (see Appendix Section V.C.). This report recommended the consideration of a series of

policies and actions to better prepare the Town to meet current and future housing needs. Among these recommendations was the contemplation of mixed-use development within hamlet centers, which has the potential to add affordable housing options within the Town. During the winter of 2008 over 1,300 11th and 12th grade high school students from Clarkstown schools completed the Town of Clarkstown Student Community Survey (see Appendix Section IV.A.), which provided a unique insight into their plans for the future and their opinions on issues ranging from volunteer emergency service participation to municipal park use and environmental concerns. The survey also provided crucial information on the students' plans for housing after high school and college graduation. Of the 97.3% of students who reported that they planned on attending college after high school graduation, 53.2% responded that they were planning on returning to Clarkstown after college. 76.4% of those students who planned on returning after college also stated that they would prefer to live on their own upon returning, preferably in mixed-use areas proximate to services, retail, restaurants and entertainment.

Mixed Use Hamlet Center Zoning

Furthering the goal of developing mixed use development, the Town passed legislation throughout the past 12 years to encourage residential development in its Hamlet Centers. Adding to the Congers and Valley Cottage Hamlet Center Overlays which were in existence when the 2009 Comprehensive Plan was adopted, Hamlet Center Zoning Districts were developed for the Hamlets of West Nyack, New City and Nanuet and the sub-hamlets of Rockland Lake (Congers) and Bardonia. More specifically, the Hamlet Commercial (HC) zoning district was developed for West Nyack with strict architectural regulations fitting of this historic area. Four different Hamlet zoning districts (H1, H2, H3 and H4) were adopted for New City. Then the Neighborhood Shopping (NS) district was developed for the area of 9W adjacent to Rockland Lake in Congers and the intersection of Route 304 and Germonds Road in Bardonia. Lastly, the area around the Nanuet Train Station was rezoned to four new zoning districts (TOD1, TOD2, TOD3 and HC-N) specifically designed to encourage Transit Oriented Development. With each successive hamlet zoning district, the Town increased density and streamlined the process to encourage development. More, however, needs to be done, as very little development has occurred in these areas. Further analysis will be conducted and the Zoning Code amended as needed to best promote and guide development in these areas. The Hamlet Center zoning districts should be modified to adapt to the current needs and desires of the community, and can be employed in new areas where appropriate, such as the retail areas mentioned in Economic Development. Through the application of proper planning policy, comprised of public outreach, the analysis of spatial data and the application of innovative planning principles, new areas can be developed and older areas re-adapted in a responsible manner.

Senior Housing

When the 2009 Comprehensive Plan was written, there were four nonprofit subsidized senior housing developments providing 424 total affordable rental units, namely Squadron Gardens, New City; Monterrey Gardens, Bardonia; and Middlewood Village and Seton Village, Nanuet. There was also just one assisted living complex, Sunrise of New City with 76 units. Around the same time, the Town Board adopted a floating zone, the Adult Active Residential (AAR) zone, which

encouraged the development of over 55 age restricted housing primarily in non-residential areas. The intent of the AAR zoning was to address the needs of the growing elderly population throughout the entire economic spectrum which exists in Clarkstown. It allowed for the development of up to 800 units across the town and provides a density bonus incentive for developing affordable units if the applicant so desires.

Since 2009, two additional subsidized senior housing complexes have been constructed, Hyenga Lake and Vincent's Village, both in Nanuet, with a total of 200 rental units. Two AAR developments were also constructed, Eden Park and Wolfe Landing in West Nyack, with a total of 77 units. Two additional areas of New City were zoned AAR, but have yet to be developed. The Town found that the AAR zoning district, while well-intentioned, allowed developers to sell almost all of the units at or above market rates. To provide more opportunities for affordable senior housing, in 2014 the Town restructured the original Senior Housing Special Permit requirements that allowed the development of aforementioned nonprofit subsidized housing at 21 units per acre and to allow for-profit senior housing at 16 units an acre, with a 10 percent affordable unit set aside. Senior housing was also introduced into all of the Hamlet Centers mentioned above. To safeguard residential neighborhoods, the Town restricted the placement of senior complexes in residential zones to State and County roads, required additional setbacks and buffers and capped the total number at 700 units in residential districts. Senior housing was also expanded to include assisted living. Since 2014, one assisted living complex has been constructed, Atria of New City with 80 units. Another assisted living complex and various independent living senior projects are currently under review, many of which are located in the New City Hamlet Center as well as Congers and West Nyack. The Town is also assessing the potential to develop additional affordable housing on properties it recently purchased in Congers and Nanuet.

Neighborhood Preservation

During the public meetings for the 2009 Comprehensive Plan and again for the Comprehensive Plan Update many residents expressed concern over out-of-scale development occurring within their neighborhoods. The cohesion of the Town's neighborhoods is vital to the well-being of the community. Land use regulations will establish maximums to limit development to meet the healthy carrying capacity of the land. When over-development occurs local infrastructure is overburdened, the aesthetic quality of neighborhoods is damaged and environmental harm can occur. While permitting residential units above businesses in hamlet centers and allowing for senior housing in the Town's neighborhoods will help meet the demand for affordable housing for both young and old, this process could potentially alter the character of Clarkstown's neighborhoods. Through proper architectural oversight the Town can accommodate new development, residential and otherwise, without jeopardizing the traditional composition of its neighborhoods.

GOALS & OBJECTIVES

Permit apartments over businesses. The elevated cost of housing in Clarkstown makes living in the Town difficult for younger persons and those with lower or fixed incomes. Permitting apartments over businesses, specifically in the town's hamlet centers, would also increase density in the areas of Town best equipped to handle such an influx. These housing units must be well regulated to ensure they do not violate their building permits or covenants. Additional enforcement

will be provided not only to ensure that proposed housing will be in compliance, but also to ensure that any existing illegal units will not become legitimized without meeting building codes. Unit caps, as were done for the Active Adult Residential (AAR) floating zone and Senior Housing Special Permit, will be considered for these developments in order to manage residential growth. The Town will consider permitting apartments over businesses in additional zoning districts.

Create an inventory of existing residentially zoned institutional properties and consider obtaining the right of first refusal for any property that may become available for future residential development. Given the limited number of remaining properties within the town suitable for the development of housing, it is crucial that a database of available land be created. Utilizing the Town's GIS capabilities, priority lands can be identified, and the Town can take appropriate measures to ensure it is notified when a property owner plans to sell.

Adopt zoning that requires a set aside of new units for workforce and volunteer housing. The Town may consider a policy requiring a minimum number of units be set aside on all new development, or an equivalent payment to an affordable housing fund, to enable the development of appropriately priced housing options for residents in the workforce and volunteer emergency service workers. Covenants will be used to ensure compliance with occupancy requirements. These housing units must be well regulated to ensure they do not violate their building permits or covenants. Additional enforcement will be provided not only to ensure that proposed housing will be in compliance, but also to ensure that any existing illegal units will not become legitimized.

Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care. The Town will continue its land use and policy initiatives to ensure a range of housing options exist for seniors. The Town will review and expand on zoning initiatives such as the Senior Housing Special Permit and the Active Adult Residential floating zone to incorporate a range of senior housing development into the community, as well offering incentives and requirements for the provision of affordable senior housing units. The Zoning Code and Map will also be reviewed and amended as necessary to provide independent, assisted-living and nursing home facilities that are appropriate in scale and location.

Create zoning to encourage income adjusted housing for emergency service volunteers. The high cost of market rate housing in Clarkstown adversely impacts volunteerism. The reduced number of eligible volunteers creates 'staff' shortages, which have the potential to affect the quality of services and could threaten the existence of volunteer services. The goals and objectives of the Housing section need to be implemented to address this problem.

Expand initiatives to safeguard neighborhoods from inappropriately scaled development. Development whose density or bulk far exceeds those of surrounding established residential neighborhoods will be discouraged. Through strict interpretation of zoning laws and outreach and education for officials and developers, the Town can protect its neighborhoods from the environmental and aesthetic damage out-of-scale development can cause. In addition the Town will require supplemental landscaping, increased buffers and the installation of fencing or other screening to protect neighborhood cohesiveness and mitigate nuisance.

f) Recreation, Parks & Open Space

Clarkstown enjoys a premier system of parks, recreational facilities and open space lands (Figure 21). The recreational programs that have been developed over the past 60 years reflect vision, sound planning and responsible funding. The Town has put together a plan for future projects and set policies that will meet the community's changing needs and desires. Clarkstown's quality of life is of paramount importance as the Town implements and improves programs and protects and preserves the land, all while being sensitive to the financial resources of the Town and its residents.

Recreation and Parks

Formally established in 1960, the Clarkstown Parks Board & Recreation Commission has grown and evolved the Town's parks and recreation facilities and programs into one of the best systems in Rockland County. The Recreation and Parks Commission is the administrative body of the Town of Clarkstown that is formally charged with the oversight, administrative and operational duties of the town's parks and recreation facilities. Currently, the Commission is comprised of a seven member Board and a Superintendent.

Initially run as a part time town department, the Recreation & Parks department has grown from a staff of two persons in 1960 into a full-fledged department of over 50 full time and approximately 400+ part time / seasonal employees. In early 2019, the maintenance and custodial staff were moved into the newly formed Department of Engineering and Facility Management. Currently the Department of Recreation & Parks operates with approximately 20 full time employees.



Rockland Lake State Park



Waterslide at Germonds Park

The seven member Parks Board and Recreation Commission sponsors and conducts a year round program of activities, events and services for the children and adults of the community under full time professional supervision. Recreation staff operates over 100 seasonal and year round instructional programs and events for youths, adults and senior citizens.

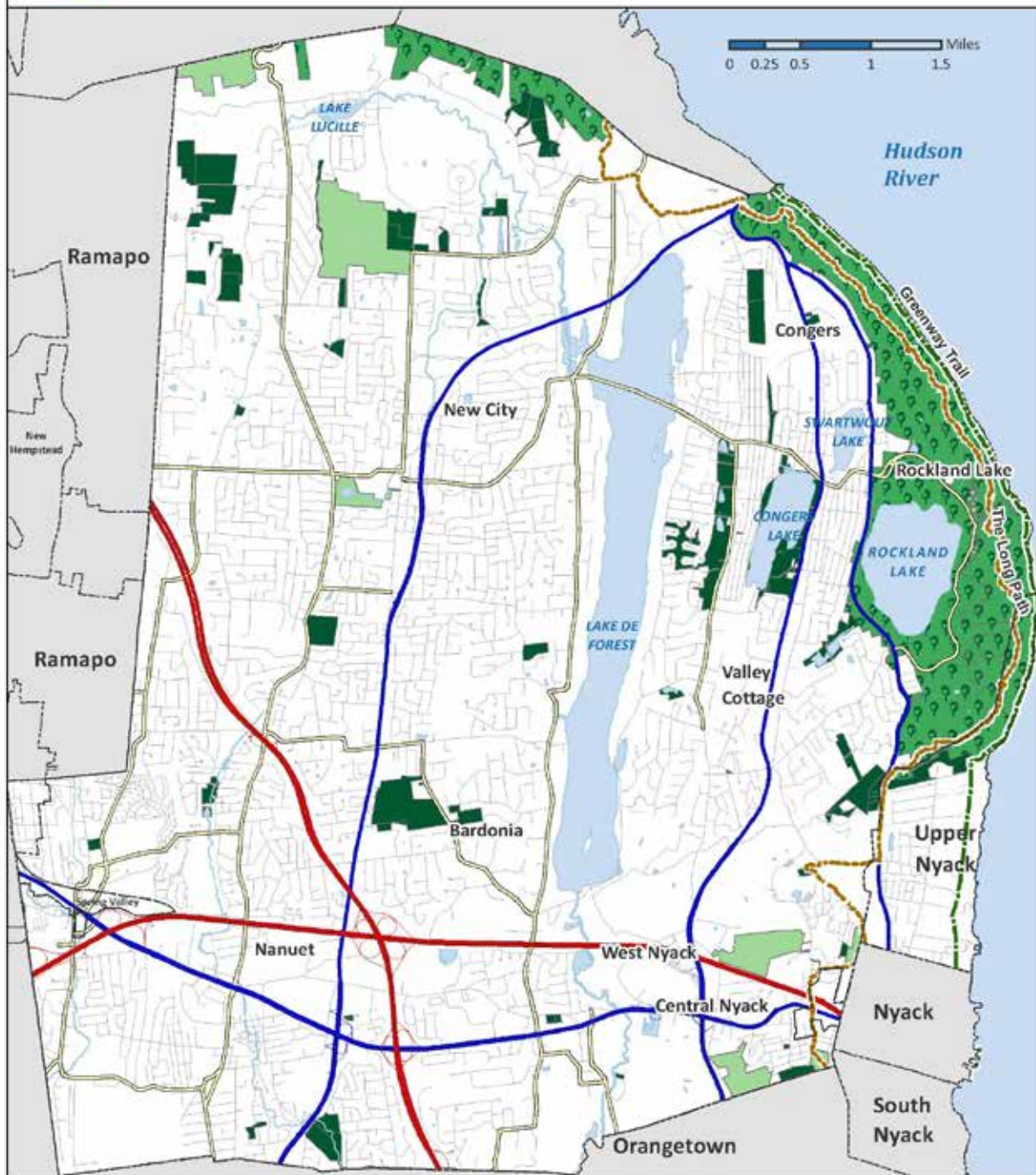
Town of Clarkstown, NY: 2021 Comprehensive Plan



Open Space & Recreation

- | | | |
|---------------------------|--------------------|-------------------------------|
| Lakes and Streams | Interstate Highway | Clarkstown Parks & Open Space |
| Town & Village Boundaries | State Highway | Rockland County Parks |
| Greenway Trail | County Highway | New York State Parks |
| Long Path | Local Road | |

**The Long Path, as shown here and in the Rockland County Official Map does not reflect recent changes to alignment.



Prepared by: Clarkstown Planning Department, GIS.
 Source: Clarkstown Planning Department, GIS; Rockland County Planning Department, GIS.
 The Town of Clarkstown makes no warranties express or implied, as to the accuracy of the data on this map.
 This map is for general information purposes and must not be relied upon for engineering or site specific purposes.

Figure 21

The programs cover a variety of offerings including but not limited to culture, sports, camps and instructional lessons. In addition, the Department oversees 12 senior citizen clubs consisting of approximately 1,500 senior citizens throughout the town. Each club meets weekly and has their own slate of officers.

The Recreation & Parks administrative offices are located at Zukor Park / Street Community Center complex on Zukor Road in New City and operate year round. Recreation & Parks has an operating budget of approximately \$5.4 million and oversees a 600 plus acre town-wide park system. This encompasses 20 parks/preserves, 4 community centers, 3 large outdoor swimming facilities, 17 ballfields, 8 playgrounds and a mini-golf course, as well as various basketball, tennis and pickleball courts and other recreational amenities and parks operations facilities. The Town offers a variety of facilities which can be reserved by permit. Showmobile permits are issued for a variety of civic/community events such as parades and street fairs. There are 5 picnic areas for Clarkstown residents or organizations to reserve by permit, each offering a large barbeque grill and picnic tables. The four community centers also have community rooms that are available and there many ballfields that can be reserved throughout the town.

Outdoor recreational facilities in Clarkstown are largely in line with identified priority needs. However, a few new recreational facilities, primarily athletic fields and courts, are needed. In addition, upgrades to certain aging facilities have been identified and will be targeted as priority projects. The Recreation and Parks Department is also committed to the expansion of the Towns walking paths and trails. Since the adoption of the 2009 Comprehensive Plan, a trail around Congers Lake has been completed, and new trails have been added at Germonds Park. The Town will also continue to explore options for the location of a new domed facility and the continued use, upgrade and expansion of the existing Community Centers. In addition, Clarkstown is seeking to construct a fixed outdoor performance area to host concerts and other events.

Open Space

In 2000, the Town of Clarkstown Planning Board adopted Open Space Guidelines for the acquisition of property to specifically protect environmentally sensitive resources, farms, historic and cultural places, rivers and streams and watersheds (see Appendix Section V.E.). Additionally, open space was seen as a way to connect existing parks and provide opportunities for passive recreational activities. In furtherance of these goals, the Clarkstown Open Space Citizen's Advisory Committee, comprised of members representing each hamlet of Clarkstown, developed a prioritized list of properties for acquisition. This report was published on June 22, 2001 (see Appendix Section V.F.). In 2002, the Town of Clarkstown was authorized by permissive referendum to bond \$22 million for open space purchases. In 2005, a Staff Advisory Committee on Clarkstown Open Space Acquisition was formed to guide the remainder of the acquisition process. This committee, comprised of Clarkstown staff from several Town departments, recommended additional guidelines for open



Cropsey Farm

space acquisition emphasizing the importance of protecting high elevation areas (both hilltops and hillsides), scenic areas, properties that support biodiversity, habitat corridors and Critical Environmental Areas (see Appendix Section V.G.). The Staff Advisory Committee also developed an evaluation formula for ranking parcels. The Planning Board's guidelines along with those recommended by the Staff Committee were formally adopted by the Town Board. Open space lands and resources throughout the Town continue to be proposed and evaluated for acquisition into Clarkstown's existing parks, recreation and open space system. Thus far, 320 acres have been protected (Table 5).

Table 5
Town of Clarkstown Open Space Acquisitions

Former Property Owner	Hamlet	Acreage	Funding
Conlon	West Nyack	2.72	Town
Kempton	New City	17.90	Town
Zacharakis	Valley Cottage	19.30	Town
Afarian & Kazanjian	Central Nyack	2.30	Town
Rockland County (Celery Farm)	Congers	14.60	Town
Rockland County (6 Route 304)	Bardonia	0.67	Town
Rockland County (38 Rose Rd)	West Nyack	0.47	Town
Rockland County (355 Germonds Rd)	West Nyack	0.06	Town
Estate of Zacharakis	Valley Cottage	4.90	Town
Blake	Central Nyack	9.36	Town
Alimanestianu	Valley Cottage	35.30	Town
Perrineau	Valley Cottage	4.27	Town
Goldman	New City	6.80	Town
Mazzuca*	Valley Cottage	25.03	Town
MacGuffie	New City	22.39	Town
Torsoe (South Highview Avenue)	Nanuet	3.81	Town
HighTor Vineyard	New City	52.95	PIPC**
Karen Bryant	New City	42.33	PIPC**
Cropsey Farm	New City	23.85	Town/County w/NYS Grant
Marydell	Upper Nyack	30.08	Town/Village of Upper Nyack w/NYS OPRHP Grant***
29 Pine View Road	West Nyack	1.01	NYS MVUFP****

* Conservation easement

** Palisades Interstate Parkway Commission

*** New York State Office of Parks, Recreation & Historic Preservation

**** New York State 2013 Mohawk Valley - Upstate Flooding Program

GOALS & OBJECTIVES

Updates to Existing Town Parks and Recreational Facilities:

Replace the existing soccer field at Zukor Park. The soccer field at Zukor Park is currently shut down from November thru March. By replacing the field with an alternate surface the field can remain open year round. In addition, portable goals will allow for the use of the field for sports other than soccer, such as lacrosse.

Construct a comfort station at King's Park. The King's Park baseball fields are currently used for girls' softball, adult softball and by Clarkstown schools. The playground at King's Park also sees heavy use. King's Park is the only park of its kind in Clarkstown that does not have restroom facilities, which are now required by code.

Continue the provision of a variety of senior citizen recreational facilities and programs. The Town's numerous senior citizen amenities are a vital asset to its senior population. As the Town continues to work to provide additional housing options for its senior citizens, the provision of these recreational assets will remain a priority.

Continue to upgrade the equipment and infrastructure at Town parks and recreational facilities to maximize the safety and benefit of residents. Continued maintenance and upgrading of park and recreational equipment and facilities is crucial to providing the best and safest experience to residents. For example, in recent years, the playground at Zukor Park and the pool at Germonds Park have been upgraded. The Recreation and Parks Department will continue to assess its infrastructure to ensure its facilities are in top order, and work to acquire the best equipment available for the benefit of all residents.

New Town Parks and Recreational Facilities:

Construct a multi-use, domed sport and recreational facility. Nearly all outdoor sports organizations, many of which rent space at commercial facilities throughout Rockland County, have requested an indoor practice and game field(s). The organizations indicate they would be willing to pay for use of indoor space in Clarkstown. A domed facility would provide year-round recreational space. The Town will attempt to locate this facility in an existing developed area or underutilized space, with the goal of minimizing impact to natural areas.

Construct additional pickle ball courts at Town parks and recreation facilities. The growing popularity of pickle ball was evident in the large number of requests made by residents during the public outreach process of the Comprehensive Plan Update. The Town currently has 6 pickle ball courts on the roller rink at Congers Lake Memorial Park, and also 1 standalone court and 4 marked out courts on the tennis courts at Congers Lake Memorial Park.

Additionally, there is 1 indoor court at the Street Community Center and 2 indoor courts at the Congers Community Center. The Town will continue to search for new spaces to add additional courts.

Construct a fixed performance area for Town concerts and events. The Town is in need of a permanent facility at which to hold outdoor performance events. A fixed performance area will allow a more convenient experience for attendees, and a greater variety of programming. The Town is considering placement of this facility at Germonds Park.

Town Trails:

Develop walking trails at Davenport Preserve. The Davenport Preserve Master Plan Update published in January 2009 recommends a series of trail and site improvements at Davenport Preserve. The addition of trails, along with other improvements to the property, will create a unique asset within the Town which will provide new recreational and educational opportunities for residents. Community participation will be sought regarding the future plans for the preserve.

Provide intra- and inter-Town trails. In addition to regional trails such as the Long Path and Greenway Trails, local trails are needed to connect the parks within the Town as well as the parks and trails of other adjacent municipalities. For example, a portion of the Palisades Interstate Parkway trail in the Town of Orangetown could be extended into and through the Town of Clarkstown. In order to connect Lake Nanuet Park to areas to the north, the Town will study the feasibility of developing a trail using the existing and former rights-of-way of the Erie Railroad Piermont Line, portions of which the Town owns, as well as other properties owned by the Town, County and State. Similarly, the Town will investigate the possibility of developing trails along rights-of-way, easements and lands of utilities, railroads, municipal entities and state agencies. The Town will continue to work with the New York/New Jersey Trail Conference in its efforts to improve existing trail networks, such as the Long Path, and explore opportunities for the development of new trails.

Open Space:

Continue the acquisition of open space lands following the amended Town of Clarkstown Open Space guidelines. Open space lands and resources throughout the Town will continue to be evaluated for acquisition into Clarkstown's existing parks, recreation and open space system, based on Clarkstown's Open Space Guidelines as amended by the Staff Advisory Committee. Open space acquisitions will provide linkages between existing conservation and recreational areas, protect sensitive natural features and scenic viewsheds and preserve cultural resources, particularly historic properties and the Town's last remaining farms.

g) Transportation

The Town of Clarkstown continues to work to improve its transportation infrastructure. Using the information derived from The Clarkstown Comprehensive Transportation Plan prepared by Cambridge Systematics in 2009, the Town has been better able to prioritize transportation projects to their greatest effect. As the Town continues to enhance its roadway, transit, bicycle and pedestrian infrastructure, it has embraced the principles of Complete Streets policy in order to ensure all users of these systems can utilize them as safe and efficiently as possible. Additionally, the Town continues to focus its denser development, both commercial and residential, in its Hamlet Centers and along roadways which have adequate capacity, as well as pedestrian and transit options to support such projects.



Governor Mario M. Cuomo Bridge
Source: NYS thruway Authority

Roadway Network

The roadway network in Clarkstown is straining to keep pace with growth in the region, including automobile, truck, bus, and non-motorized traffic (Figure 22). Clarkstown's 300 miles of roads are largely suburban in nature, where it is common to find winding residential streets, cul-de-sacs, and dead ends. Clarkstown has two Interstate Highways, including I-287, which traverses the Hudson River via the Governor Mario M. Cuomo Bridge, and the Palisades Interstate Parkway. Other highways in Clarkstown include U.S. Route 9W and State Routes 59, 303 and 304. Thirteen roads are

maintained by the Rockland County Highway Department, serving as collector routes from smaller local streets.



Nanuet Train Station

Public Transportation Services

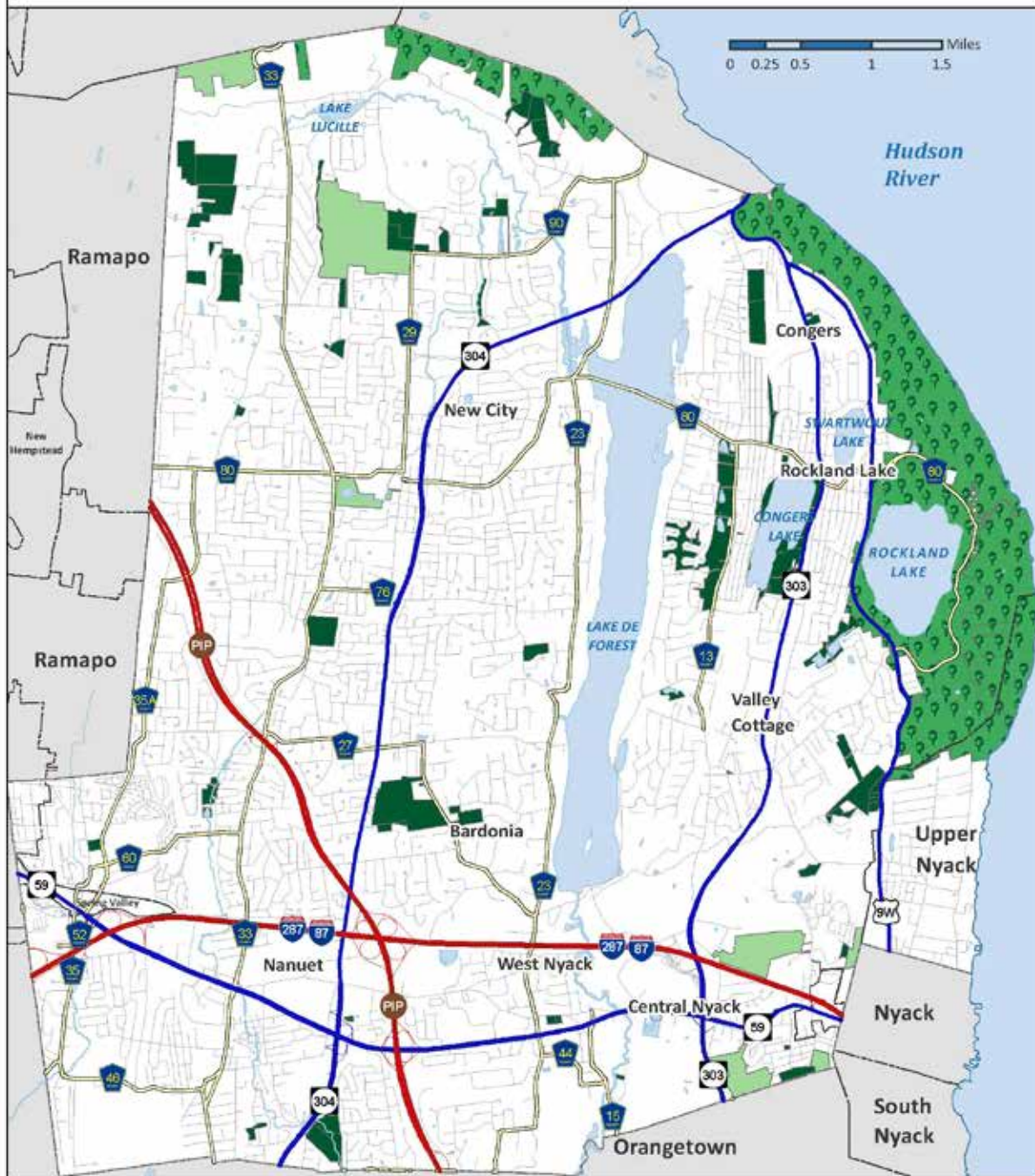
Public Transportation services operating within the Town of Clarkstown serve a vital function for local residents, workers and other travelers (Figure 23). Many Clarkstown residents depend on local transit services such as Transport of Rockland (TOR) and Clarkstown Mini-Trans for work, school, shopping, and entertainment trips. Line haul bus services such as COACH USA carry New York City-bound commuters to the Port Authority Bus Terminal or the George Washington Bridge Bus Terminal in Manhattan, or to employment locations in Northern New Jersey. The TAPPAN ZEEExpress bus system was replaced by the Lower Hudson Transit Link service in 2018, which carries commuters from Rockland County across the Hudson River to employment locations and to Metro-North Railroad

Town of Clarkstown, NY: 2021 Comprehensive Plan



Roadway Network

- | | | |
|---------------------------|--------------------|-------------------------------|
| Lakes & Streams | Interstate Highway | Clarkstown Parks & Open Space |
| Town & Village Boundaries | State Highway | Rockland County Parks |
| | County Highway | New York State Parks |
| | Local Road | |



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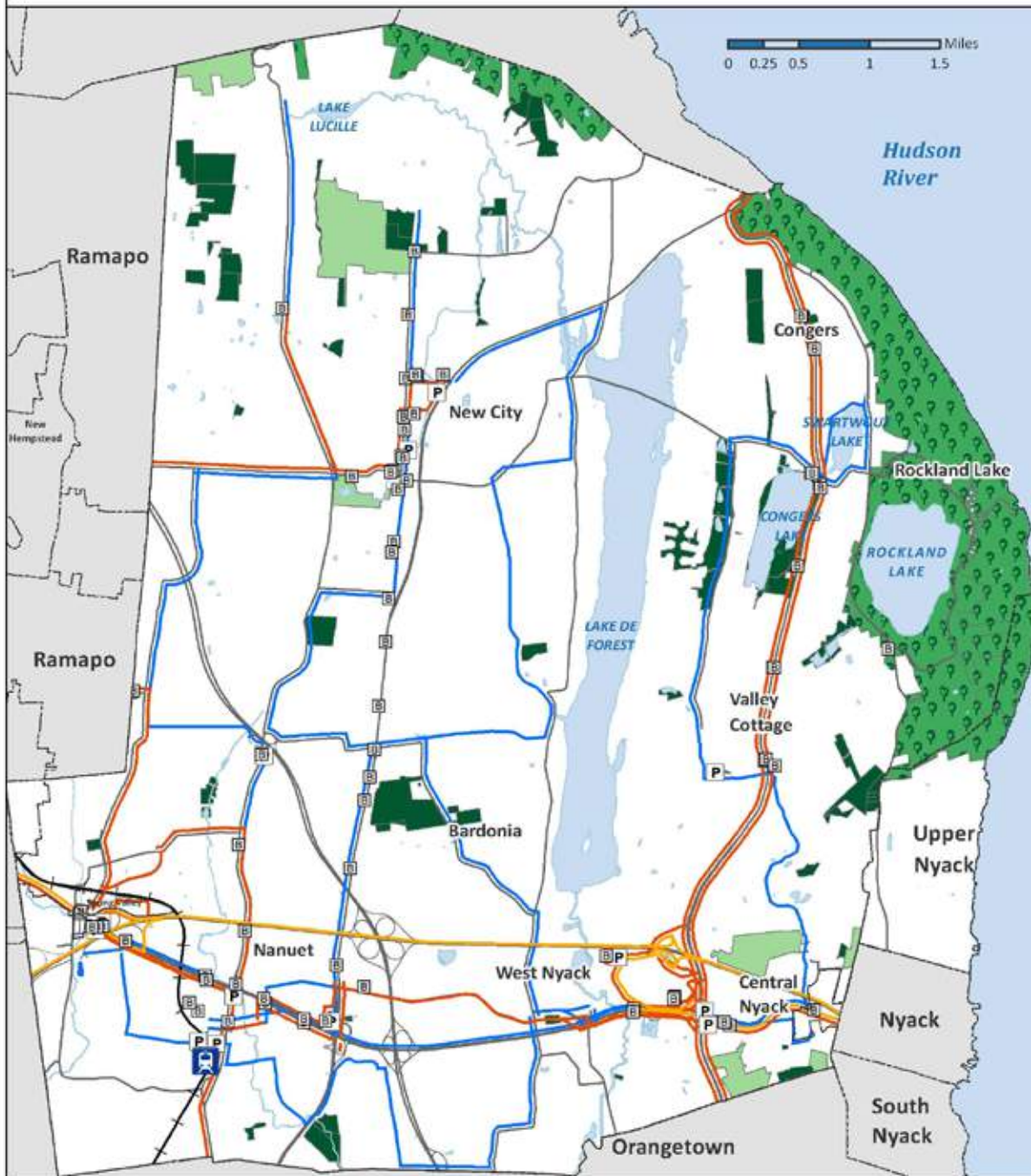
Figure 22

Town of Clarkstown, NY: 2021 Comprehensive Plan



Public Transportation Services

- | | | | |
|---------------------------|-----------------------------|---------------|-------------------------------|
| Lakes & Streams | Mini Trans | Bus Shelters | Clarkstown Parks & Open Space |
| Town & Village Boundaries | Transport of Rockland (TOR) | Rail Station | Rockland County Parks |
| Major Roads | Hudson Link | Commuter Lots | New York State Parks |
| Pascack Valley Line | | | |



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Figure 23

stations in Westchester County. New Jersey Transit and Metro-North operate commuter rail service from Nanuet to New Jersey and Manhattan.

Clarkstown continues to increase its numbers of residents and businesses, which in turn has increased travel demand. With fuel prices expected to rise, the population of older adults growing and commercial centers expected to be redeveloped along Route 59 and I-287, a strong public transportation network is essential to reducing congestion, minimizing pollution, and providing mobility to residents who need and want to be less dependent on their cars.

Sidewalk and Pedestrian Facilities

The Town's street network, diverse population, mix of land uses and transit system provide a foundation for a walkable town, especially in hamlet centers such as in New City, Nanuet and Congers. The sidewalk network generally provides a safe location for pedestrians to walk within a small geographical area, but robust connectivity between hamlets or residential areas and the denser commercial districts is lacking. Recently, resident requests for infrastructure and facilities related to walking and biking have surpassed requests for roadway intersection improvements.

Bicycle Facilities

Clarkstown's bicycle facilities are predominantly located on the eastern side of the Town, along with one recently designated bike lane along a portion of Little Tor Road (Figure 24). There are two recreational bicycle trails in the Town, the Hudson Valley Greenway, which connects Haverstraw to Upper Nyack, and the loop trail around Rockland Lake. Route 9W provides a north-south bike route which also connects to sections of the Hudson Valley Greenway. While useful for exercise and sight-seeing, recreational trails do not provide a viable means of transportation for would-be bicycle commuters. As a transportation system, there is no designated network of bicycle routes, on street or off, connecting hamlet centers or other travel generators throughout Clarkstown.

Complete Streets

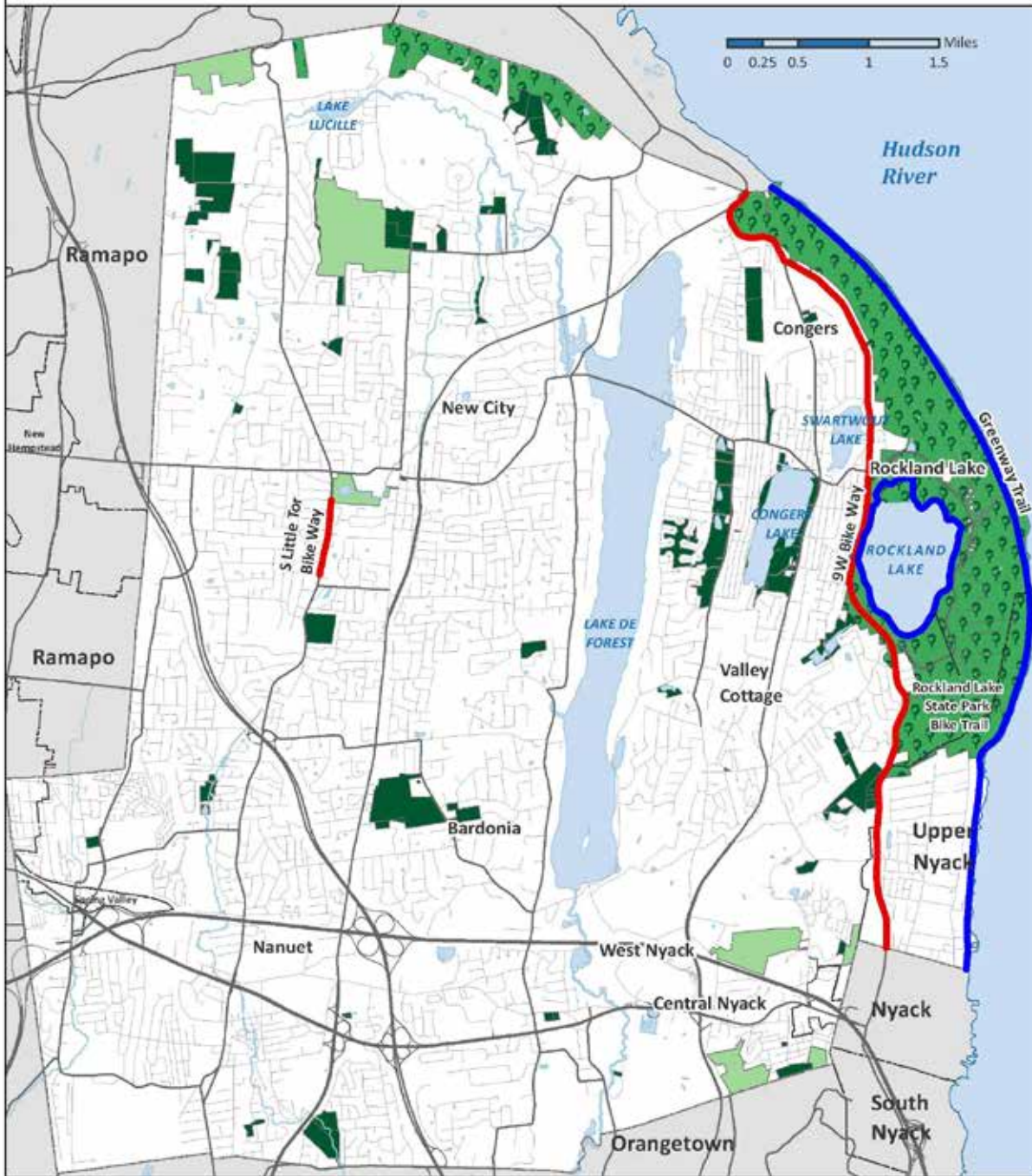
In 2017, the Clarkstown Town Board adopted a resolution committing the Town to following Complete Streets guidelines in the design and upgrade of its roadways. Complete Streets policies seek to promote an integrated system which considers the needs of all users of the Town's roadways including pedestrians, bicyclists, public transportation riders, motorists, and citizens of all ages and abilities, including children, the elderly and the disabled. Utilizing multiple grants awarded by the NYS Department of Health and issued by the Rockland County Department of Health, Clarkstown began to implement its Complete Streets Program. A Town Complete Streets Committee was formed and training sessions and walking surveys were held to educate members on the principles of Complete Streets. Several site studies were conducted on roadways throughout the Town in order to examine what improvements could be made to enhance pedestrian safety in these areas. Ultimately, the Committee created criteria for selected Complete Street projects and ranked over 700 road segments (see Appendix Section V.N.) within the Town to produce a prioritized project list for use when considering roadway upgrades (Figure 25 & 26).

Town of Clarkstown, NY: 2021 Comprehensive Plan



Bicycle Facilities

- | | | |
|---------------------------|----------------------------------|-------------------------------|
| Lakes & Streams | On Street: Bridge/Park/Separated | Clarkstown Parks & Open Space |
| Town & Village Boundaries | On Street: Striped | Rockland County Parks |
| Major Roads | | New York State Parks |
| Local Roads | | |



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Figure 24

Town of Clarkstown, NY: 2021 Comprehensive Plan

Complete Streets Project Selection by Road Segment



Lakes & Streams
 Town & Village Boundaries

State Road
 County Road
 Local Road

Road Segment Score

1 - 6 18 - 24
 7 - 11 25 - 34
 12 - 17



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Figure 25

Town of Clarkstown, NY: 2021 Comprehensive Plan

Complete Streets Project Selection by Road Length

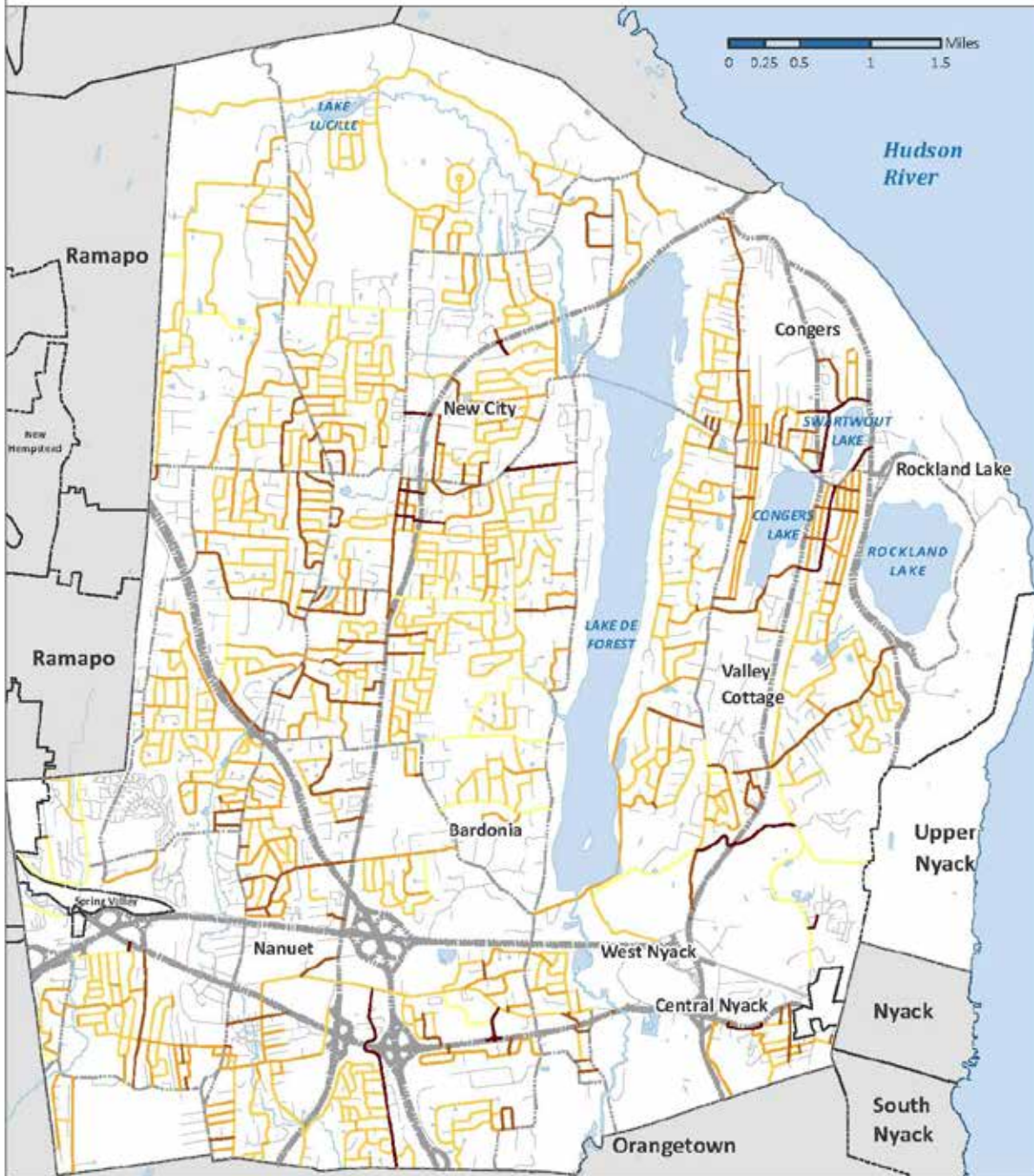


- Lakes & Streams
- Town & Village Boundaries

- State Roads
- County Roads
- Local Roads

Road Length Score

- 1 - 7
- 8 - 12
- 13 - 16
- 17 - 23
- 24 - 33



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Figure 26

Quality of Life

Clarkstown's suburban development encourages vehicular traffic. Approximately one-third of the air pollution in the region results from motorized travel. Other environmental effects of driving include excessive ambient noise, water runoff from roadways and parking lots, loss of nighttime darkness from street and parking lot lighting, and waste from automobile maintenance. Further development has the potential to exacerbate these environmental problems. The Town has identified several roadways which are in need of improvements to alleviate traffic issues. Engineering work has begun on several areas, such as Parrott Road, to begin implementing these improvements. Since the adoption of the 2009 Comprehensive Plan the New York State Department of Transportation (NYSDOT) has studied portions of a number of its roadways in Rockland County. The Town has since lobbied for similar studies along Routes 303 and 304, and it was announced in 2020 that New York Metropolitan Transportation Council (NYMTC) was including the Clarkstown Safety and Sustainability Study for Routes 303 & 304 in the Unified Work Program for state fiscal year 2021-2022. This \$800,000 study will examine ways in which to increase safety and efficiency for motorists and pedestrians along the entire length of both roadways and will be extensions of, and modeled from, the Orangetown Sustainable Development Study of Route 303, which was also funded by NYMTC. Similarly, the Town plans to continue lobbying for a study of its Route 59 corridor.

Land Use

Land use in Clarkstown is comprised largely of low-density housing. Small, winding suburban roadways, often ending in cul-de-sacs, provide access to homes surrounded by private yards. These areas are punctuated by centers of more dense suburban development, often anchored by moderate intensity retail and other commercial uses. There are a number of government properties in the area, as well as land designated for public utilities and industrial activities. The main areas of commercial use are located near I-287 and Route 59 near the southern side of the Town, and along Route 304 near the hamlet of New City. Informal analysis suggests that about a third of the commercial properties in each area are devoted to parking. While traditionally suburban or even semi-rural, Clarkstown has opportunities to create centers of development that provide convenience, local character, and sustainable design, while maintaining the quality of life residents expect (Figure 27).

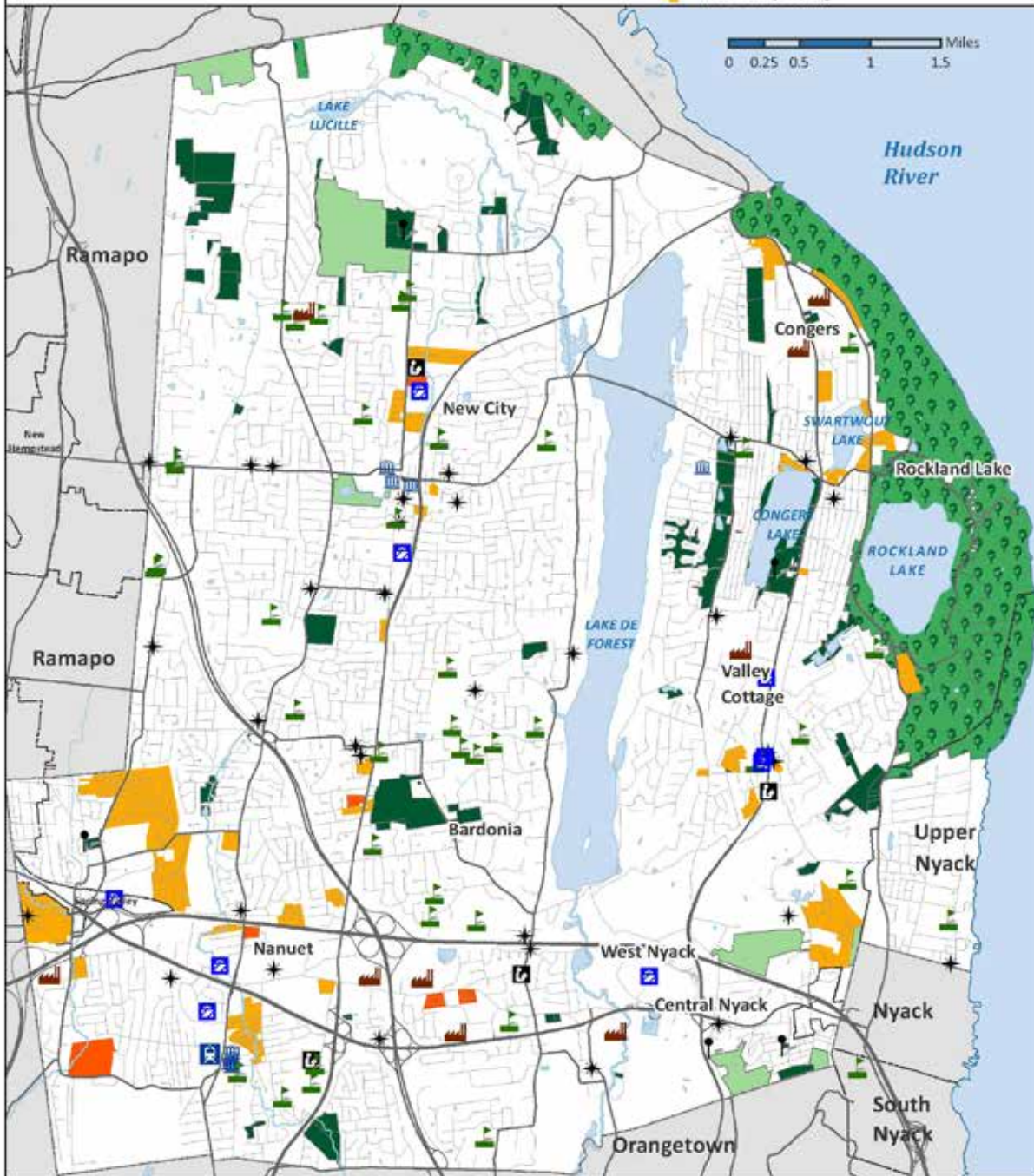
In 2017 the Hamlet of Nanuet Transit Oriented Development Plan was completed. This plan, which was developed by Cambridge Systematics Inc. in conjunction with the Town, proposed new zoning for the Nanuet Hamlet Center which focused on higher density multifamily and mixed-use development around the Nanuet rail stop. Through rezoning and capital improvements along Main Street, and around the rail stop, Nanuet will offer convenient access to mass transportation and a variety of housing and shopping choices, all within a pedestrian accessible environment. The Nanuet TOD Project was awarded a \$150,000 Cleaner Greener Communities Grant through NYSERDA to aid in its development. In June of 2019, the Clarkstown Town Board formally adopted the Nanuet TOD Plan, which involved amendments to the Town's Zoning Code, Zoning Map and Official Map. Four new zoning districts were created, including three TOD zones positioned near the rail stop, and a revamped Nanuet Hamlet Commercial zone, which was established along Main Street.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Pedestrian & Traffic Generators

- | | | | |
|---------------------------|---------------------|----------------------|-------------------------------|
| Lakes & Streams | Community Center | Retail Centers | Clarkstown Parks & Open Space |
| Town & Village Boundaries | Government Facility | School | Rockland County Parks |
| Major Roads | Library | Transit | New York State Parks |
| Local Roads | Religious | Warehouse/Industrial | Senior Housing |
| | | Multi Family Zoning | |



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Figure 27

GOALS & OBJECTIVES

Roadway Network

Provide efficient travel between the Governor Mario M. Cuomo Bridge/I-287 /I-287 corridor, Route 59 corridor, and other parts of Clarkstown. Congestion creates slower travel times for motorists to and from major destinations in Clarkstown, especially where traffic on major thoroughfares diverts onto local streets. Efficient travel throughout the Town's State and County roadways will be accomplished through access management and signal coordination (Figure 28). Consolidating access points along roadways reduces conflicting turning movements of vehicles entering and exiting the road. Coordinating signals allows a greater volume of vehicles to travel through corridors more efficiently. The Town will maintain a good level of service on local roadways while providing access to major routes by coordinating and cooperating with State and County transportation agencies.

Add to economic strength and quality of life in Clarkstown by encouraging, and coordinating with, regional transportation initiatives and studies. Clarkstown understands that transportation operates on a regional scale and the Town will be an active participant in all regional transportation projects. The Town will work with the NYSDOT, NYMTC and Rockland County on the upcoming studies of the Route 303 & 304 corridors, and continue to lobby for a study of Route 59 in Clarkstown. Further issues and concerns along State and County roadways will be addressed with the appropriate agencies as required.

Continue to implement a Complete Streets Program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes. Vehicle accidents pose a risk to life and property, interfere with traffic flow and require costly response from municipal services. As population and businesses continue to grow in the area, additional personal and freight vehicles will require access to the roadways. The town will improve points of conflict and designate appropriate uses of local roads. Roadway modifications, additional pedestrian amenities and street lighting will all be considered to improve the roadways within the Town. These projects will be coordinated with the NYSDOT and Rockland County.

Public Transportation Service

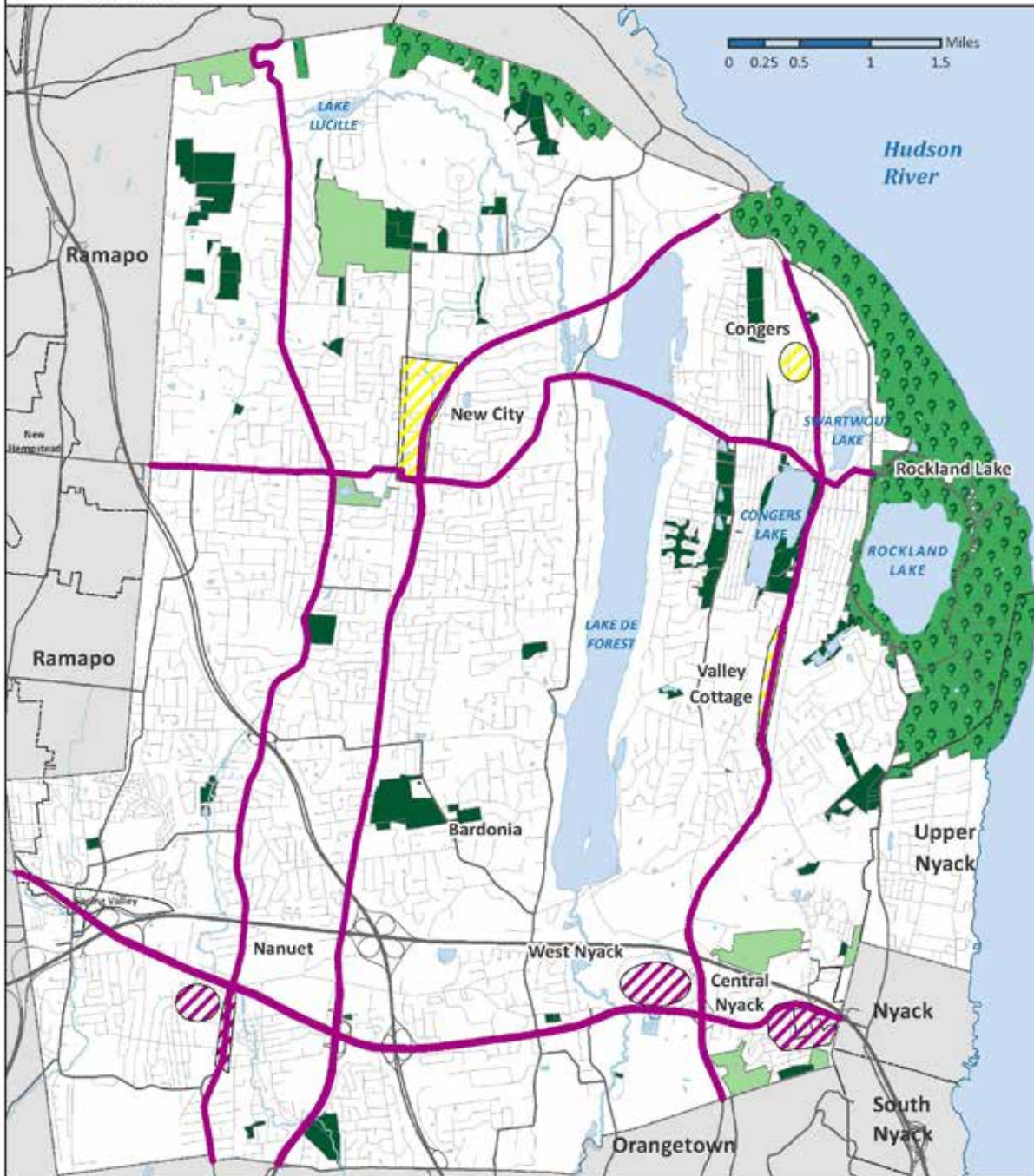
Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors. Over half of local work trips are to places in Rockland County and nearby towns. Trends in demographics will place pressure on public transportation to meet the local and regional mobility needs – for work, shopping, and recreation. The design elements of the Complete Streets Program will be utilized when planning for the interface between pedestrian and transit service connections.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Access Management Prioritization & Prioritized Signal Coordination Projects

- | | | |
|---------------------------|------------------------|-------------------------------|
| Lakes & Streams | High Access Priority | Clarkstown Parks & Open Space |
| Town & Village Boundaries | Medium Access Priority | Rockland County Parks |
| Major Roads | High Signal Priority | New York State Parks |
| Local Roads | | |



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Figure 28

Provide for commuter transit services that are accessible, efficient and safe. Clarkstown's proximity to major highways, the Governor Mario M. Cuomo Bridge and the Hudson River positions the Town to have excellent access, whether by rail or bus, to Westchester County, New York City and other major regional centers. Clarkstown will coordinate with other planning organizations and transit companies, and utilize the provisions of the Complete Streets Program to ensure its development aligns with existing and future service. With the adoption of the Nanuet Transit Oriented Development Zoning, the Town will also work with government and transit agencies to upgrade the Nanuet rail stop.

Sidewalk & Pedestrian Facilities

Create a walking environment that is accessible, safe, and enjoyable. Perhaps the simplest and most environmentally sustainable travel mode is walking. Creating a cohesive network of sidewalks and paths encourages the development of Hamlet Centers, the use of public transportation and access to parks. It also supports Clarkstown's changing demographics and economic structure. The Town will work to strengthen its pedestrian network, and encourage links between hamlet Centers, residential and commercial areas. As the town works to upgrade and develop its pedestrian infrastructure, design elements from the Complete Streets Program will be utilized.

Bicycle Facilities

Create a cycling environment that is accessible, safe, and enjoyable. (Figure 29) Cycling is already popular in Clarkstown, with access for local residents and visitors centered on Route 9W. The Town aims to make the cycling environment even better by providing regular road maintenance, linking key neighborhoods and open spaces, and coordinating connections with Route 9W and neighboring communities to create a more linked cycling network. The Town will work together with the New York State Department of Transportation and the Rockland County Department of highways, and utilize Complete Streets design principles, to coordinate and incorporate bicycle facilities into their road design and construction for highway projects and improvements.

Quality of Life

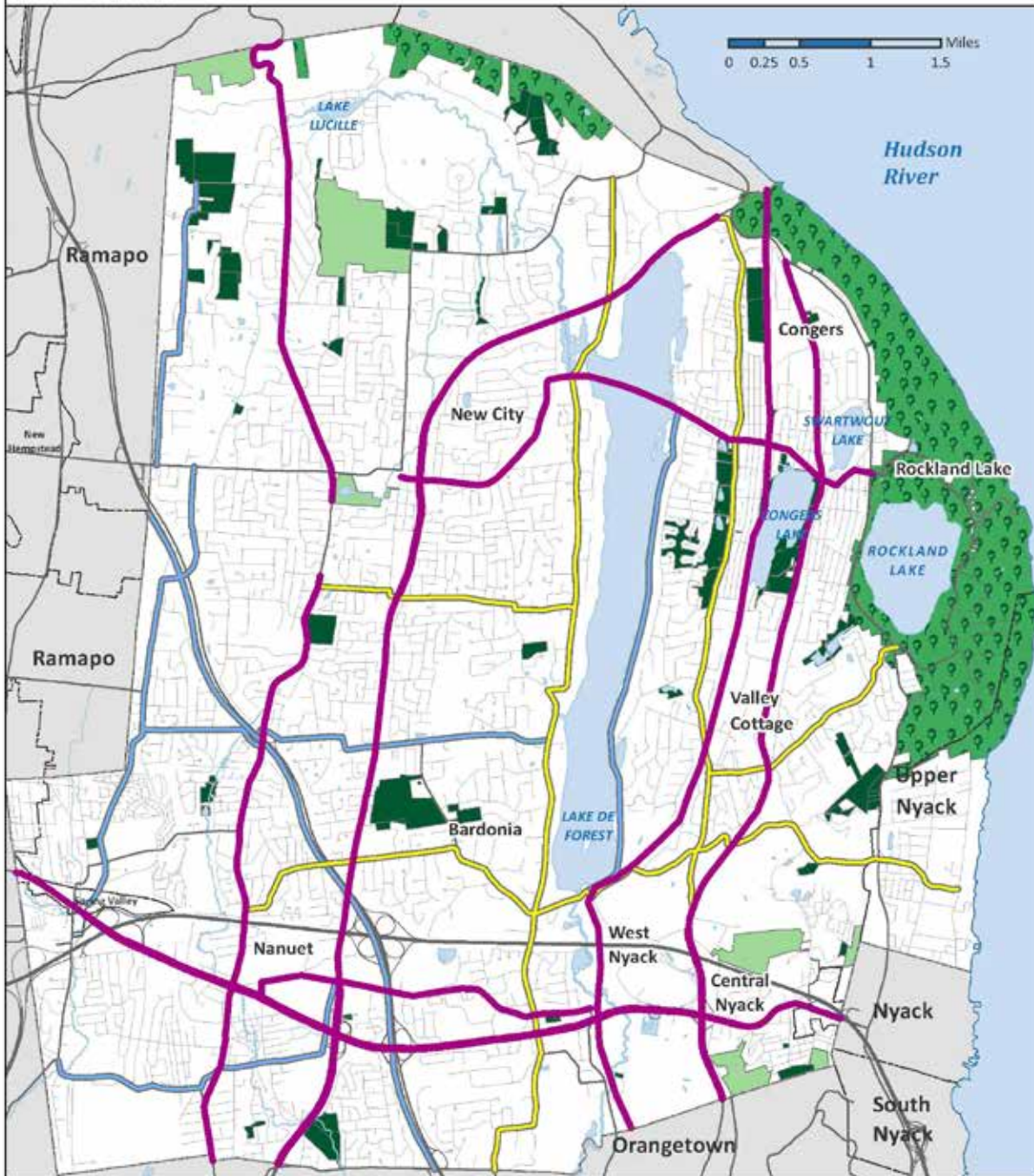
Improve residents' health by reducing air, noise and light pollution related to motorized travel. Clarkstown will improve air quality by reducing congestion, encouraging the use of public transportation, enhancing non-motorized travel and facilitating regular monitoring. Noise from vehicles can reach unhealthy levels in some areas, so Clarkstown will continually address sound levels on major roadways. While street and parking lot lighting is a necessity for safety, it nevertheless will be controlled to protect the Town's semi-rural ambience.

Town of Clarkstown, NY: 2021 Comprehensive Plan



Prioritized Bicycle Facility Projects

- | | | |
|---------------------------|-----------------|-------------------------------|
| Lakes & Streams | High Priority | Clarkstown Parks & Open Space |
| Town & Village Boundaries | Medium Priority | Rockland County Parks |
| Major Roads | Low Priority | New York State Parks |
| Local Roads | | |



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Figure 29

Land Use

Develop Hamlet Centers with transportation options and connections. Clarkstown has been innovative in enacting local land use and design regulations to create centers of more dense business and residential activity. These centers present the challenge of balancing spatial needs for walking, cycling, public transportation, on-street and lot parking, driving and deliveries. New zoning developed for the Town's Hamlet Centers will be updated to support pedestrian, cyclist and transit infrastructure. As was done for the Nanuet Transit Oriented Development Zoning, principles of the Complete Streets Program will be utilized in developing new and updating existing zoning regulations.

Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation. Clarkstown will align transportation with land use changes to create sustainable travel and development patterns, while minimizing congestion, and maximizing safety in accordance with Complete Streets guidelines. While much of Clarkstown's land is currently developed, new zoning encouraging redevelopment, as was done for the Nanuet TOD Project, will continue to create changes in and demand for the local transportation network. The Hamlet Center zoning districts should be modified to adapt to the current needs and desires of the community, and can be employed in new areas where appropriate.

h) Sustainability & Resiliency

Residents have raised a number of concerns regarding the future development of the Town; chief among these is the need to look toward more sustainable development patterns that utilize alternative modes of transportation, increase the efficiency of Town buildings and infrastructure, identify renewable energy supply sources and protect valuable environmental resources. Projects and policies which address these concerns by enhancing the sustainability of Town activities are key to a more vibrant and healthy community. Likewise, strengthening the resiliency of Town infrastructure and services is key to maintaining the health and safety of local residents in the face of increasingly common adverse environmental conditions. This is especially true when considering the potential social and economic impact of devastating storms, such as Superstorm Sandy and Hurricane Irene.

SUSTAINABILITY

Clarkstown recognizes the risk climate change poses to communities locally, regionally and globally and the importance of sustainable development. As such, in 2020 the Town commissioned a Climate Action Plan to identify local actions for reducing greenhouse gas (GHG) emissions (see Appendix Section V.R.). Well before this Plan was developed, however, Clarkstown engaged in developing projects and adopting policies that support the long-term sustainability of the Town. These projects and policies can be organized into four focus areas: built environment, transportation, power supply and environmental conservation. The following highlights just a few examples of the initiatives the Town has undertaken.

Built Environment

Zoning Initiatives that Encourage Environmentally Sound Building Design

Several of Clarkstown's zoning districts offer incentives to developers willing to build in a more sustainable fashion or mitigate impacts beyond minimum requirements. The Neighborhood Shopping, Commercial Office and Commercial Office Support zoning districts allow for an increase in buildable square footage if the developer agrees to mitigate stormwater runoff to an extent greater than currently required. The Neighborhood Shopping district also offers a development bonus to projects which obtain Leadership in Energy and Environmental Design (LEED) certification. Similarly, the Transit Oriented Development and Hamlet Commercial zoning districts recently adopted within the Nanuet Hamlet Center offer additional bonus residential unit capacity for LEED Certified developments. These measures work to support and attract new developments in the town by providing a means by which developers can increase business potential through valuable environmental incentives. The passive economic benefits of LEED certification are also felt by local developers, who will see a significant increase in energy efficiency, leading to a reduction in energy costs over the long-term.

Transit Oriented Development

As recommended in the 2009 Comprehensive Plan, Transit Oriented Development (TOD) zoning was passed to transform a tired, rundown 38-acre section of Nanuet that encircles the train station, into a multi-family residential hub with ground-level commerce and walkable streets. In line with the success of other regional TOD developments, project plans include: a new multimodal transit station on the existing line; mixed-use retail, office and workforce residential units; multi-use pedestrian paths; and walkable, pedestrian-friendly storefronts. Improved walkability in the neighborhood will provide new workforce housing on the commuter rail system, encourage public transit use with both the commuters and regional shoppers, create jobs and strengthen the economic base of both the downtown and the Shops at Nanuet. By encouraging walking and cycling, and promoting the use of public transit, TOD developments aim to reduce vehicle trips, thereby lowering the carbon emissions associated with automobile transport. Additionally, the mixed-use development found in TOD areas is more compact, and reduces the need for land clearing and impacts on natural areas.

Transportation

Complete Streets Initiatives

The development of the current Complete Streets initiative within the Town of Clarkstown emerged out of the 2010 Traffic Calming Program, which sought to redevelop streetscapes to be more bicycle and pedestrian friendly. The Complete Streets program also works to promote walking and cycling, which can reduce vehicle trips, and lower air emissions. To aid in the renewed design, engineering, and construction of public infrastructure that is simultaneously more resilient and sustainable, the program utilizes the following set of established tools:

- **Speed reduction/diversion of through-traffic:** travel lane narrowing, speed humps, turning traffic or through traffic prohibitions, pavement markings, curb extensions/neckdowns, curb installations, driver speed feedback sign, chicanes, roundabouts, neighborhood traffic circles, and the strategic use of trees/vegetation.
- **Walkability improvements:** sidewalks, curb ramps, crosswalks, shared use paths, side paths, and/or walkable shoulders. These are based on existing/projected future use and connections, and take into account user age and mobility requirements.
- **Bicycle improvements:** bike-able shoulders, shared lane markings/sharrows, shared use paths/side paths, or bike lanes.
- **Safety improvements:** curve warning improvements, road diets, turning lanes, striped shoulders, turn prohibitions to reduce vehicular or pedestrian conflicts, high crash location mitigation, etc. may be used in conjunction with walkability, bike improvement, and speed reduction tools such as intersection conversions to roundabouts.
- **Improved access to transit:** on-street bike racks, benches, shelters, way finding/signage.

Power Supply

Community Choice Aggregation

Community Choice Aggregation (CCA) enables municipalities to join together to aggregate the buying power of residents, giving them more options in how they purchase electricity. By pooling

local demand, municipalities can negotiate more favorable terms, designate preferred generation sources, and select a more preferable default energy service company for the community. This new service can often empower local municipalities to select 100% renewable electricity for their residents and small businesses, at a fixed and often lower price than they've historically paid for the same power. Currently the Town of Clarkstown, along with other towns in the county participate in a CCA program, known as "Rockland Community Power." This program, and others like it, seek to launch and implement CCA programs in order to secure clean, less expensive electricity for residents and small businesses across NY State.

Solar Permitting Law

The adoption of this legislation aims to promote the accommodation of solar energy systems and equipment throughout the Town of Clarkstown. It assigns a variety of regulations to the development of these systems, to ensure their smooth and efficient operation within the Town. This legislation also specifies a variety of design and engineering guidelines, to both support the development of future projects, while minimizing the potential negative impacts of these projects.

Solar energy is an essential renewable energy resource, whose consumption can offset GHG emissions. Most importantly, energy generated from solar energy systems has the potential to be sold back into the grid, providing its users with an added fiscal benefit. The use of solar energy generation equipment for the purpose of providing electricity and energy for heating and/or cooling is a priority within the Town's current and long-term sustainability goals.

Landfill Solar Field Project

The Landfill Solar Field project features a 2.3-megawatt system, which consists of roughly 4,300 solar panels on a 13-acre portion of the former landfill located in West Nyack. It was the first megawatt-scale municipal Photovoltaic (PV) Array system to be constructed in New York State. As of 2017, it generates approximately 3 million-kilowatt hours annually, which is enough power to supply about 200 homes, or about one-third of the energy required for the Town's municipal facilities.



Onforce Solar Array in West Nyack

LED Street Light Program

The Town of Clarkstown has completed a \$2.9 million project to retrofit the bulk of active high-pressure sodium streetlights with energy-efficient light-emitting diodes, or LEDs. Cost savings from the eco-friendly project are expected to reach over \$10 million throughout the next decade, by reducing energy consumption through a substantial increase in efficiency and active lifetime expectancy. The implementation of this new energy-efficient streetlight system will reduce the town's energy bill by an estimated \$500,000 annually. In addition to enormous



Utility worker retrofitting existing streetlamps with next-generation LEDs

cost-savings, this project will work to reduce the Town's overall greenhouse gas emissions by nearly 1,000 metric tons of CO₂ equivalent (MTCO₂e) per year.



EV charging stations at Town Hall

Electric Vehicle Charging Stations

The Town passed legislation encouraging the development of electric vehicle charging stations. Stations have been installed at the Palisades Center Mall and the Shops at Nanuet. These charging stations not only provide a benefit to electric vehicle owners, but provide a boost to local businesses. The average time required to fully charge an electric vehicle is around 30 minutes, and with these chargers located strategically near a key shopping and business center, those looking to recharge their car also have the opportunity to patronize local shops. The Town of Clarkstown recently installed electric charging stations at Town Hall.

Parking Lot Solar Canopies

Many of the Town's municipal facilities are equipped with expansive parking lots. The Town is seeking grant funding for the construction of solar canopies over such lots to fully utilize otherwise single-use open areas. These canopies will not only provide much needed shade for cars parked there during the day, but work to enhance renewable energy resources by providing additional solar energy generation capabilities to support the Town's growing energy needs. Funding for these projects is being sought through NYSERDA's Net Zero Energy for Economic Development Program, which awards funds for the development of energy resources that put local communities on the path toward Net Zero GHG emissions.

Environmental Conservation

Open Space Acquisition

In 2000, the Town of Clarkstown adopted Open Space Guidelines for acquisition of property aimed at protecting environmentally sensitive resources, farms, historic and cultural places, rivers and streams and watersheds. Since then, over 320 acres have been protected, with additional open space land and resources throughout the Town continuing to be proposed and evaluated for acquisition into Clarkstown's existing parks, recreation, and open space system. These acquisitions are mainly intended to increase recreational spaces, protect valuable natural resources, maintain the semi-rural character of the Town, and to maintain and improve a higher quality of life for local communities. This program also has the potential to offset some of the Town's GHG emissions. Large natural areas act as carbon sinks, absorbing atmospheric GHG and storing it in organic material. As a Town committed to reducing its impact on global climate change, maintaining a substantial and healthy stock of protected natural areas is essential. In addition to its effect on GHG emissions,

open space areas are permeable. This has the added benefit of making the Town more resilient to flooding and other extreme precipitation events, as pervious surfaces enable excess water to be absorbed safely.

Tree Preservation

In line with efforts to maintain healthy Open Spaces, a 2006 Local Law was enacted to prevent the clear-cutting and indiscriminate removal of trees within the Town. The clear-cutting of trees contributes to flooding problems and other negative environmental impacts, from erosion, to noise and light pollution, to air quality. Trees also work to offset existing GHG emissions, and their removal constitutes an overall increase in harmful GHG emissions town-wide. The law provides for the replanting of trees identical or similar in type to the ones cut, and requires a permit to remove more than five at a time.

The Town of Clarkstown has a vital interest in the planting and preservation of trees within its territorial boundaries. Trees stabilize the soil on slopes, thereby preventing erosion, siltation and flooding—all significant concerns to local property owners. They also control water pollution, purify the air by generating oxygen, mitigate noise disruption and reduce residential energy consumption by providing shade. In performing these functions, trees not only work to offset some of the town's GHG emissions, but also contribute to an overall increase in property values.

The destruction and removal of trees also have substantial municipal costs beyond the direct costs of removal. The wanton removal of trees directly affects drainage control remediation efforts, impairs the value of all property, and has a deleterious effect on the health and general welfare of the citizens of Clarkstown. This law establishes standards for the protection of these valuable natural resources and provides a workable method of determining under what circumstances a tree may reasonably be removed.

RESILIENCY

Since 1999, 10 serious flooding events have impacted the residents and businesses, roads, critical infrastructure systems, and natural resources throughout the Town. To address this and other natural disasters, the Town participated in the New York Rising Community Reconstruction (NYRCR) Program in 2014 (see Appendix Section V.M.). This program was established to provide rebuilding and revitalization assistance to communities damaged by Superstorm Sandy, Hurricane Irene, and Tropical Storm Lee. The goal of the program is to rebuild from these storms and to increase communities' physical, economic, and social resilience to future storm events. The NYRCR is a state-wide initiative that aids in the development of resilient and sustainable communities. Under this program, the Town worked to develop a resiliency plan that



Demarest Kill flooding in New City

identifies areas which are most vulnerable to storm damage, designs methods to mitigate these impacts, and identifies funding to support future development projects that enhance resiliency.

The strategies developed within the NYRCR Plan consider many of the emergency, disaster recovery, long-term resiliency, and economic development needs that either remain unmet or that can be further strengthened through future development projects. It also works to develop initiatives and financial assistance programs to better protect residents, businesses, and commercial centers from future storm damage and allow them to recover more quickly. In addition to the NYRCR Plan the Town also partners with Rockland County agencies to mitigate environmental hazards through programs like the Rockland County All-Hazard Mitigation Plan, which addresses not only flooding, but drought, wildfire and other risks.

Critical to withstanding the negative impacts of a storm event is ensuring access to, and improving the resiliency of critical health, transportation, and service infrastructure. This program has identified various methods to improve storm water infrastructure and drainage systems using green infrastructure practices where possible. This includes preserving open spaces and natural resources that support flood mitigation, through conscientious land-use planning, policy, and regulation.

Addressing these issues is an important step toward rebuilding a more resilient community. Through this plan, the Town of Clarkstown has moved toward identifying critical assets in the community, assessing the assets' exposure to risk, and identifying where recovery and resiliency needs exist. This has resulted in a series of comprehensive reconstruction and resiliency strategies, which identify specific projects and implementation actions to help fulfill those needs.

Enhancing the resiliency of the Town provides an opportunity for residents, business owners and community leaders to actively participate in planning for a stronger future. It empowers local residents to prepare locally driven recovery and resiliency plans, as well as to identify innovative reconstruction and resiliency projects and other actions to allow the community not only to survive, but also to thrive in an era when natural risks will become increasingly common. This move toward building adaptation reflects Clarkstown's vision and goals, honoring its unique qualities and assets for building a safer, more resilient future.

GOALS & OBJECTIVES

Create a Town Committee on sustainability and resiliency. To prioritize the development of programs and policies that internalize the sustainability and resiliency of the local community, the Town of Clarkstown will establish a working committee to oversee ongoing efforts. Throughout the public outreach process of the Comprehensive Plan Update, the Town received a number of valuable, specific comments and ideas from citizens, environmentalists, environmental organizations and officials on ways the Town can implement many of the Plan's environmental goals and objectives. A review of these comments and ideas will be undertaken by the Town's sustainability and resiliency committee upon its formation, and is intended serve as a framework of the committee's task of recommending new Town environmental policies. This committee, which will be advisory to the Supervisor and Town Board, will also assist in the review of policy and development proposals to ensure that such projects align with the Town's efforts to strengthen and

protect the local environment. The committee will also have the potential to research and propose future adaptation projects, as well as sustainable systems and policies, to ensure that future development supports the sustainability and resiliency of the Town.

Develop programs to reduce greenhouse gas emissions. Conducting a greenhouse gas (GHG) emissions inventory for the Town is the first critical step toward reduction. Assessing which areas or sectors are the largest contributors to overall emissions can then enable the development of programs and policies that reduce or regulate emissions. This includes projects that utilize sustainable technologies or energy sources to help reduce the carbon footprint of the Town and its residents. In addition to increased efficiency and sustainable sourcing, programs that work to reduce emissions through alternative transportation modes and development patterns are key. The program will build upon the Town's past success and focus on four key areas:

- **Built Environment:** relates to the efficiency standards required of local buildings and facilities within the Town, as a significant amount of local emissions are associated with energy use within residential, commercial, and industrial structures. Policy in this area works to reshape physical infrastructure in an effort to offset and reduce GHG emissions. This includes the implementation of advancements in the efficiency of lighting, HVAC, insulation, and other power consumption areas.
- **Transportation:** relates to the fuel efficiency of vehicular traffic associated with the Town, as the largest share of emissions in the town appears to be as a result of vehicular traffic. Policy proposals, such as the Complete Streets program and the installation of EV charging stations, promote fueling and transportation alternatives which enhance sustainability and increase the quality of life for local residents.
- **Power Supply:** relates to the development and incentivization of renewable energy sources through various projects and programs. As current consumption patterns rely heavily on fossil fuel sources, investments to sustainable energy is a key way to help reduce future GHG emissions.
- **Environmental Conservation:** relates to ongoing land management practices that seek to foster and preserve natural ecosystems, as the health of the local environment is directly tied to the sustainability of local communities. This includes the continued implementation of the Town's acquisition of lands for open space and the furtherance of tree preservation initiatives.

Develop programs to educate Clarkstown residents on issues of sustainability and resiliency. Educating local residents is key to the long-term success of programs and policies that directly impact the sustainability and resiliency of the Town. By raising awareness and understanding of the specific challenges and possibilities that confront the Town, future programs will receive the support of local constituents. Initiatives such as the EPA's WaterSense program offer educational opportunities for both homeowners and builders to increase awareness on the topic of water efficiency, and will be encouraged. Increased awareness not only has the potential to lead to positive outcomes for potential future programs—it will work to build a more resilient and sustainable community through knowledge. Having an informed understanding of the key strengths

and vulnerabilities of the Town will put residents in an advantageous position with regard to the potential negative impacts of climate change.

Develop programs to increase the Town's resiliency to the effects of climate change. As the negative environmental impacts of climate change become increasingly more apparent, it is imperative to build resiliency through the development of programs and policies that support the continued health of local communities. This includes projects which directly address shortfalls in critical infrastructure, such as the electricity grid, medical facilities, and storm water management systems. Building in adaptation to both existing and future systems will be vital to ensuring the continued health, safety, and vitality of local communities throughout the Town.

VI – Implementation

a) Policy Changes

Many of the goals and objectives of the Comprehensive Plan do not require changes to the zoning code or zoning map of the Town. For example, there are goals and objectives to develop programs to increase the Town's resiliency, educate Clarkstown residents on historic sites and enhance communication with the business community. Additionally, the Town received a large number of comments and suggestions for new and expanded environmental initiatives which could be implemented to enhance and protect the Town's natural areas and resources. As stated in the Sustainability & Resiliency chapter of the Plan, it is a goal of the Town to create a committee to review environmental policy within the Town, and the comments received during the public outreach concerning environmental protection implementation will serve as a framework of the committee's task of recommending new Town environmental policies. The implementation of these and other similar goals and objectives can occur by instituting new or changing existing processes and procedures employed by various Departments of Town government. In general, these goals and objectives do not have a direct effect on the development of the Town, but they are essential components to successfully implementing the overarching goals of the Comprehensive Plan and will not be overlooked.

b) Critical Environmental Area Designation

Clarkstown has the ability to designate portions of Town as Critical Environmental Areas (CEA). CEAs are specific geographic areas having exceptional or unique environmental characteristics that should be protected. According to SEQRA, any action within a CEA is considered a Type I action, requiring more extensive full environmental review (SEQRA 617.2 (i)). The Town Board will consider designating environmentally sensitive areas highlighted in the Environmental Resources section, such the Hackensack River, Palisades Ridge and areas of high biodiversity, particularly the island at the southern end of Lake De Forest, which is home to a wide diversity of bird species.

c) Infrastructure Improvements

The Comprehensive Transportation Plan developed by Cambridge Systematics identified over 100 discrete transportation projects in the categories of:

- Access Management
- Signal Coordination
- Accident Reduction
- Public Transit
- Sidewalks
- Bicycle Paths

Cambridge Systematics employed an analytical process to measure overall project benefits and developed suggested rankings of the projects organized by project type. While each of the projects will have some measure of positive benefit to the Town's transportation network, many issues and events factor into which projects are finally implemented, including location, cost, available funding and public input. In addition, the Complete Streets Committee ranked over 700 road segments within the Town to produce a prioritized project list for use when considering roadway upgrades. Aside from capital improvements, specific infrastructure development can be implemented through the use of the Town Official Map.

d) Town Official Map Changes

The Town Official Map provides another mechanism for embodying and implementing the goals of the Comprehensive Plan. The Town Board is empowered by New York State Law to establish an official map "to conserve and protect the public health, safety and general welfare" (New York State Town Law §270). Official Maps show the designated location and width of streets, highways, parks and drainage systems. The Town will determine designated street widths appropriate for the levels of traffic, neighborhood character and pedestrian activity of the roadway. The Town's Official Map needs to be updated with respect to existing conditions and will be used to establish proposed infrastructure improvements, such as new parks, drainage systems, roadways and sidewalks along streets. In addition to illustrating needed infrastructure improvements and proposed parkland for the Town, the official map will show areas where applicants for development will be required to set aside property for transportation improvements such as road widening and sidewalks. Since the adoption of the 2009 Comprehensive Plan, the Official Map has been fully digitized and is now available for the public to access on the Town's website. This digitization of the Official Map utilizing the Town's GIS has also made accessing features of the map much more efficient for Town staff, as well as having made updating the map an easier process.

e) Inter-Municipal Agreements

Many of the goals and objectives of the Comprehensive Plan affect geographic areas outside of the Town's municipal borders and are of county, regional, state and national importance. For example, the Comprehensive Plan recommends protecting the Palisades Ridge, which is a part of the Hudson Highlands geologic formation spanning four states, and installing sidewalks along portions of Route 304, a State highway. Similarly, the Town has experienced major flooding events that cross several municipal boundaries and affect multiple jurisdictions. Many of the projects recommended here require permits from multiple levels of government and can be too costly to be borne by just one municipality. Clarkstown will continue to participate in Inter-Municipal Agreements (IMAs), such as with the Rockland Riverfront Communities Council, and form new IMAs, when appropriate, to protect regional resources, promote public safety and reduce the Town's financial burden.

f) Zoning Text Amendments

Several of the goals and objectives of the Comprehensive Plan can only be implemented by changing the Town Code. Rather than affecting the zoning of specific property, text amendments change the requirements or procedures for development and can affect entire zoning districts or the Town as a whole. Many of the goals and objectives from Environmental Resources are not site specific. For example, stream corridors and wetlands, which cross properties and zoning districts, can be protected by requiring buffers of a particular dimension around these environmentally sensitive features.

g) Land Use Changes

There are two principle mechanisms by which land use can be changed in the Town: zoning map amendments and zoning text amendments. Implementing the land use goals and objectives of the Comprehensive Plan will require a critical analysis of the Town's land use chapters, especially Chapter 290 (Zoning) and accompanying bulk requirement tables, as well as the Town's Zoning Map. The Town will review these regulatory tools to identify and revise provisions that are outdated or incompatible with current land uses. The Town of Clarkstown has developed well-established single family residential land use patterns that will not and, in many areas, cannot be changed. Established neighborhoods will not be disrupted with zone changes that could adversely affect their stability, and in many areas of the Town realty subdivisions have made assemblage of properties for redevelopment difficult, if not impossible. In contrast, non-residential or underdeveloped high-density residential areas of the Town lend themselves more to change and have been the subject of multiple zone change requests in the past. These areas of the Town that are "subject to change" generally fall into one of the following two categories that require further analysis (Figure 30):

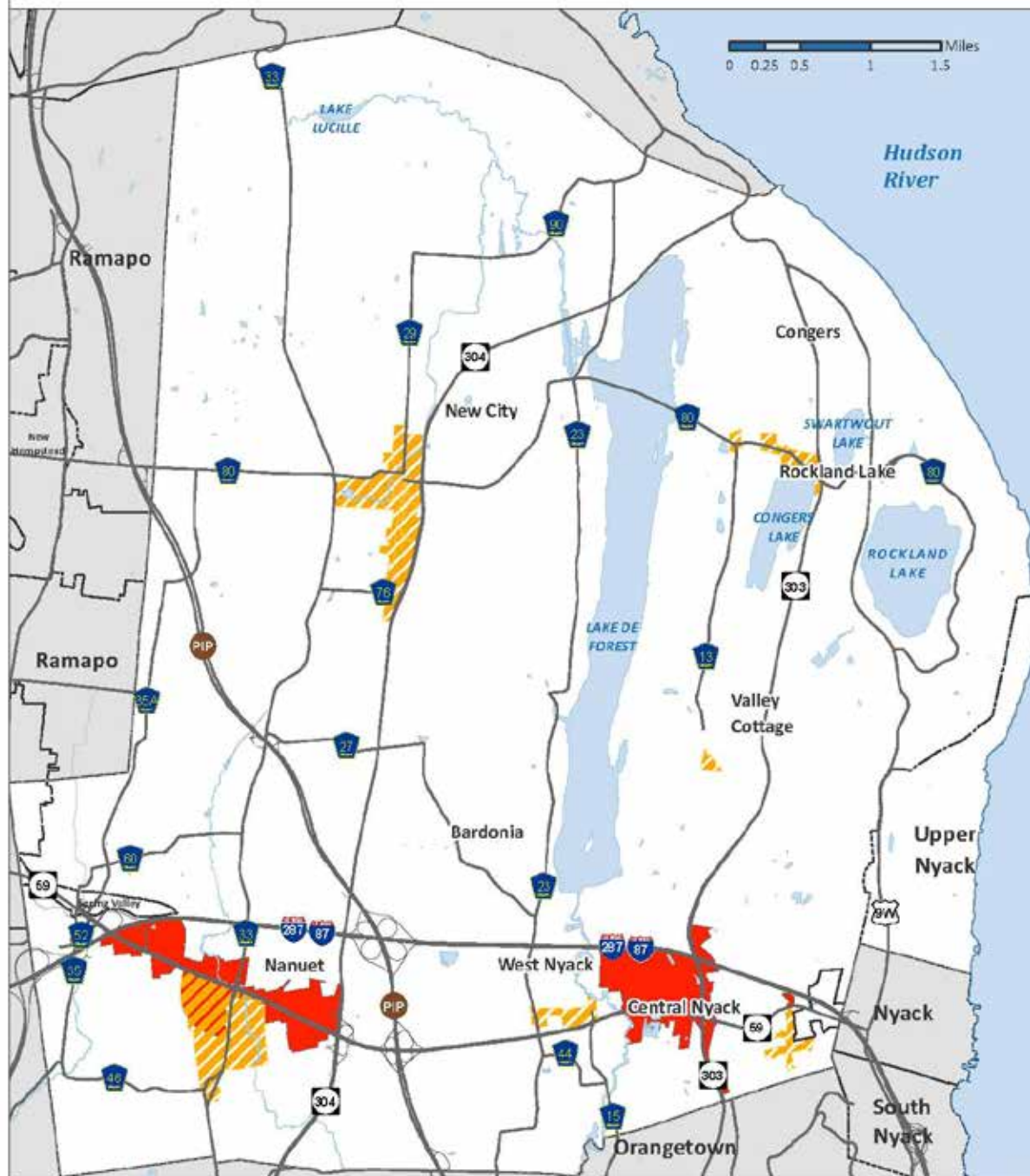
1) Regional Shopping and Major Regional Shopping Zoning District Amendments

In recognition of changes in retail trends and land use, and the need to provide a wide range of housing options within the Town, the Comprehensive Plan Update recommends that the land use within the Regional Shopping (RS) and Major Regional Shopping (MRS) zoning districts be analyzed and appropriate amendments be developed in line with the goals of the Plan. The Town will study specific business and residential needs in terms of land development and transportation infrastructure within these districts. Flexible new zoning will be developed that addresses the operations of modern businesses in terms of building usage and parking requirements, and provide for the development of housing where appropriate. It will encourage the reuse of existing buildings or the redevelopment of sites, and provide incentives for innovative development designs that reduce consumption of natural resources, via site layout, building construction or transportation alternatives.

Town of Clarkstown, NY: 2021 Comprehensive Plan

Primary Land Use Change Study Areas

-  Lakes & Streams
-  Major Regional & Regional Shopping
-  Town & Village Boundaries
-  Hamlet Centers
-  Major Roads



Prepared by: Clarkstown Planning Department, GIS.
 Source: Clarkstown Planning Department, GIS; Rockland County Planning Department, GIS.
 The Town of Clarkstown makes no warranties express or implied, as to the accuracy of the data on this map.
 This map is for general information purposes and must not be relied upon for engineering or site specific purposes.

Figure 30

2) Hamlet Center Zoning District Amendments

The Comprehensive Plan Update recommends diverse mixed-use development in all of the Town's Hamlet Centers that supports walking, biking and transit use. The Plan also promotes the construction of low-energy buildings, reducing automobile use and creating vibrant "downtowns" with a mix of residential, business and retail uses. Similar to the changes called for in other areas of the Town, Hamlet Centers should be zoned in a manner which permits a range of uses, and consideration of new commercial trends and uses must be taken. Likewise, the proximity of the Town's Hamlet Center's to State roadways with bus routes makes them prime candidates for transit oriented development (TOD) development approaches. The implementation of a more consistent hamlet center zoning will also help streamline development, and better organize the Zoning Code to make interpretation of regulations easier for both developers and Town officials.

The amendments to the Towns RS and MRS zoning districts and within the Town's Hamlet Centers will integrate transportation improvements and commercial and residential development. Figure 30 illustrates the land use changes recommended by the Comprehensive Plan Town-wide. These land use changes will be considered in light of local neighborhoods and site specific locations and will require further public participation. Environmental factors will need to be studied thoroughly and comprehensively as was done with the development of this Comprehensive Plan. Integrating environmental considerations into the land use decision making process will ensure that the Town will develop in a sustainable manner now and into the future.

h) Records and Asset Management Information System

The Town of Clarkstown's initial embrace of Geographic Information Systems (GIS) technology was ahead of its time for a town government when it was established in 2008. Since then, the Town has utilized GIS to accomplish a number of goals, including the implementation of a request and complaint management system; the implementation of a parts, fleet, and maintenance system; web-based mapping applications; and digital versions of the Town's Zoning and Official maps.

The GIS Strategic Plan Committee, consisting of members from Engineering and Facilities Management, Highway, Planning, and the Supervisor's Office began the process of creating a long-term work plan in September, 2017. Historically, Clarkstown has maintained records in a paper environment, but now technological advances have created opportunities to greatly increase the speed at which information can be made available and shared among departments; the potential for deeper analysis and precise decision making are all possible when information is put into an information system designed for such purposes.

Building on the results of the original Geographic Information System Needs Assessment and Implementation Plan (see Appendix Section V.P.) the GIS program looks to also support the development of the newly formed Department of Engineering and Facilities Management's need for data and application development. Further, this plan seeks to address two important functions—to protect public safety and to reduce risk from man-made and natural disasters. To better align GIS resources and program objectives with Town needs, this Plan recommends five (5) primary projects involving data creation and access that will culminate into a complete Records and Asset Management Information System. This system will improve Clarkstown's ability to serve the

public, lower long-term maintenance costs, and protect public safety. The commitment to provide necessary resources would allow the following objectives to be achievable within the next three to five years:

- Develop Asset Management Information System to support Department of Engineering and Facilities Management and Highway operations by creating location and maintenance information of Town maintained infrastructure.
- Develop Records Management Information System to support Assessor, Building, and Planning operations by creating a searchable, geographically referenced, digital database of land records within Clarkstown.
- Expand Executive, Public Safety, and Emergency Management awareness by providing access to the Records and Asset Management Information System via mobile technology.
- Provide analytical support for infrastructure capital improvement and maintenance plans.
- Provide ongoing support and maintenance for all existing and future GIS-based systems.
- Develop a mapping tool, accessed through the Town's website, for viewing the data provided in the figures within the Comprehensive Plan.

VII - Evaluation of Potential Impacts of Goals & Objectives

The defining characteristic of this document is its combined structure as both a Comprehensive Plan and Generic Environmental Impact Statement as specified by the State Environmental Quality Review Act. This format requires that all possible adverse environmental impacts be examined, and that the means to mitigate these adverse effects also be explored. Many of the impacts that are identified are conceptual or hypothetical; they may not occur. As such, proposed mitigation is discussed in general terms. Further SEQR compliance will be required as specific conditions and thresholds have not been established for these actions. As goal and objectives are implemented, New York State Environmental Conservation Law 6 NYCRR Part 617.10 (d) will require further site or action specific detailed review of any additional potential adverse impacts. Many environmental impacts share the same mitigating measures, and, as each recommendation has been examined separately, there is some repetition in the following table.

IMPACT ON LAND

Impact	Topic	Goal or Objective	Mitigation
Land disturbance due to regrading for buildings, parking, etc.	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and that would not conflict with existing residential uses.	Enact legislation to protect ridgelines, continue enforcement of sediment and erosion control measures, both during and after construction, and revise ordinances to lower thresholds for mandatory erosion controls, and to increase penalties for violations of those ordinances.
Land disturbance due to regrading for buildings, parking, etc.	Economic Development	Ensure that a variety of housing options exists within the Town	Enact legislation to protect ridgelines, continue enforcement of sediment and erosion control measures, both during and after construction, and revise ordinances to lower thresholds for mandatory erosion controls, and to increase penalties for violations of those ordinances.
Land disturbance due to regrading for buildings, parking, etc.	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Enact legislation to protect ridgelines, continue enforcement of sediment and erosion control measures, both during and after construction, and revise ordinances to lower thresholds for mandatory erosion controls, and to increase penalties for violations of those ordinances.

IMPACT ON LAND

Impact	Topic	Goal or Objective	Mitigation
Land disturbance due to regrading for buildings, parking, etc.	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Enact legislation to protect ridgelines, continue enforcement of sediment and erosion control measures, both during and after construction and revise ordinances to lower thresholds for mandatory erosion controls, or to increase penalties for violations of those ordinances.
Land disturbance due to regrading for buildings, parking, etc.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Enact legislation to protect ridgelines, continue enforcement of sediment and erosion control measures, both during and after construction and revise ordinances to lower thresholds for mandatory erosion controls, or to increase penalties for violations of those ordinances.
Land disturbance due to regrading for buildings, parking, etc.	Housing	Permit apartments over businesses	Enact legislation to protect ridgelines, continue enforcement of sediment and erosion control measures, both during and after construction, and revise ordinances to lower thresholds for mandatory erosion controls, and to increase penalties for violations of those ordinances.
Land disturbance due to regrading for buildings, parking, etc.	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Enact legislation to protect ridgelines, continue enforcement of sediment and erosion control measures, both during and after construction, and revise ordinances to lower thresholds for mandatory erosion controls, and to increase penalties for violations of those ordinances.
Litter and debris generated around trails.	Recreation, Parks & Open Space	Develop walking trails at Davenport Preserve.	Begin anti-litter campaign and institute an educational program. Promote volunteer clean-up activities.

IMPACT ON LAND

Impact	Topic	Goal or Objective	Mitigation
Land disturbance due to regrading for trails	Recreation, Parks & Open Space	Develop walking trails at Davenport Preserve.	Install and maintain sediment and erosion control measures, both during and after construction.
Litter and debris generated around facilities.	Recreation, Parks & Open Space	Construct a comfort station at King's Park.	Begin anti-litter campaign and institute an educational program. Promote volunteer clean-up activities.
Litter and debris generated around facilities.	Recreation, Parks & Open Space	Construct pickle ball courts at Town parks and recreational facilities.	Begin anti-litter campaign and institute an educational program. Promote volunteer clean-up activities.
Land disturbance due to regrading.	Recreation, Parks & Open Space	Construct a comfort station at King's Park.	Install and maintain sediment and erosion control measures, both during and after construction.
Land disturbance due to regrading.	Recreation, Parks & Open Space	Construct pickle ball courts at Town parks and recreational facilities.	Install and maintain sediment and erosion control measures, both during and after construction.
Land disturbance due to regrading for buildings, parking, etc.	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Install and maintain sediment and erosion control measures, both during and after construction.
Land disturbance due to regrading.	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Install and maintain sediment and erosion control measures, both during and after construction.
Land disturbance due to regrading for roads, trails, etc.	Transportation	Implement a Complete Streets program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes.	Install and maintain sediment and erosion control measures, both during and after construction.
Land disturbance due to regrading for roads, trails, etc.	Transportation	Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors.	Install and maintain sediment and erosion control measures, both during and after construction.

IMPACT ON LAND

Impact	Topic	Goal or Objective	Mitigation
Land disturbance due to regrading for roads, trails, etc.	Transportation	Provide for commuter transit services that are accessible, efficient and safe.	Install and maintain sediment and erosion control measures, both during and after construction.
Land disturbance due to regrading for roads, trails, etc.	Transportation	Create a walking environment that is accessible, safe, and enjoyable.	Install and maintain sediment and erosion control measures, both during and after construction.
Land disturbance due to regrading for roads, trails, etc.	Transportation	Create a cycling environment that is accessible, safe, and enjoyable.	Install and maintain sediment and erosion control measures, both during and after construction.
Land disturbance due to regrading for buildings, parking, etc.	Transportation / Sustainability & Resiliency	Create diverse mixed-use development areas that allow for walking, biking and are well-served by public transportation.	Install and maintain sediment and erosion control measures, both during and after construction.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Increased stormwater runoff from additional impervious surfaces as a result of buildings, parking, etc.	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and that would not conflict with existing residential uses.	Enact legislation that limits development coverage, establishes local wetland protection and requires stream corridor buffers. Require permeable pavement to reduce runoff, and water quality and quantity designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased stormwater system capacity	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and that would not conflict with existing residential uses.	Require stormwater basins and other designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands. Require maintenance agreements and cash posting to ensure upkeep of these systems.
Decreased stormwater system capacity	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Require stormwater basins and other designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands. Require maintenance agreements and cash posting to ensure upkeep of these systems.
Increased water consumption	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and that would not conflict with existing residential uses.	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Increased water consumption	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased water supply	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and that would not conflict with existing residential uses.	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Decreased water supply	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Decreased sewerage capacity	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and that would not conflict with existing residential uses.	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Decreased sewerage capacity	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Increased stormwater runoff from additional impervious surfaces as a result of buildings, parking, etc.	Economic Development	Ensure that a variety of housing options exists within the Town	Enact legislation that limits development coverage, establishes local wetland protection and requires stream corridor buffers. Require permeable pavement to reduce runoff, and water quality and quantity designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.
Decreased stormwater system capacity	Economic Development	Ensure that a variety of housing options exists within the Town	Require stormwater basins and other designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands. Require maintenance agreements and cash posting to ensure upkeep of these systems.
Increased water consumption	Economic Development	Ensure that a variety of housing options exists within the Town	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Decreased water supply	Economic Development	Ensure that a variety of housing options exists within the Town	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased sewerage capacity	Economic Development	Ensure that a variety of housing options exists within the Town	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Increased water consumption	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Decreased water supply	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Decreased sewerage capacity	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Increased stormwater runoff from additional impervious surfaces as a result of buildings, parking, etc.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Enact legislation that limits development coverage, establishes local wetland protection and requires stream corridor buffers. Require permeable pavement to reduce runoff, and water quality and quantity designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.
Decreased stormwater system capacity	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Require stormwater basins and other designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands. Require maintenance agreements and cash posting to ensure upkeep of these systems.
Increased water consumption	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Decreased water supply	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased sewerage capacity	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Increased water consumption	Housing	Permit apartments over businesses	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Decreased water supply	Housing	Permit apartments over businesses	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Decreased sewerage capacity	Housing	Permit apartments over businesses	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Increased stormwater runoff from additional impervious surfaces as a result of buildings, parking, etc.	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Require permeable pavement to reduce runoff and water quality and quantity designs to treat runoff in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased stormwater system capacity	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Require stormwater basins and other designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands. Require maintenance agreements and cash posting to ensure upkeep of these systems.
Increased water consumption	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Decreased water supply	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Decreased sewerage capacity	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Increased stormwater runoff from additional impervious surfaces as a result of trails etc.	Recreation, Parks & Open Space	Develop walking trails at Davenport Preserve.	Require permeable pavement to reduce runoff, and water quality and quantity designs to treat runoff in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Increased stormwater runoff from additional impervious surfaces as a result of buildings	Recreation, Parks & Open Space	Construct a comfort station at King's Park.	Require permeable pavement to reduce runoff and water quality and quantity designs to treat runoff in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.
Increased stormwater runoff from additional impervious surfaces.	Recreation, Parks & Open Space	Construct pickle ball courts at Town parks and recreational facilities.	Require permeable pavement to reduce runoff and water quality and quantity designs to treat runoff in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.
Increased stormwater runoff from additional impervious surfaces as a result of buildings, parking, etc.	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Require permeable pavement to reduce runoff, and water quality and quantity designs to treat runoff in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.
Increased stormwater runoff from additional impervious surfaces.	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Require permeable pavement to reduce runoff, and water quality and quantity designs to treat runoff in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.
Decreased stormwater system capacity	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Require permeable pavement to reduce runoff, and water quality and quantity designs to treat runoff in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased stormwater system capacity	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Require permeable pavement to reduce runoff, and water quality and quantity designs to treat runoff in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.
Increased water consumption	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Increased water consumption	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Decreased water supply	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Decreased water supply	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased sewerage capacity	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Decreased sewerage capacity	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.
Increased stormwater runoff from additional impervious surfaces as a result of roads, sidewalks, trails, etc.	Transportation	Implement a Complete Streets program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes.	Apply roadside and catchbasin designs which divert runoff in an environmentally sensitive manner. Apply water runoff treatments such as bioswales or permeable pavers that eliminate stormwater runoff.
Decreased stormwater system capacity	Transportation	Implement a Complete Streets program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes.	Apply roadside and catchbasin designs which divert runoff in an environmentally sensitive manner. Apply water runoff treatments such as bioswales or permeable pavers that eliminate stormwater runoff.
Increased stormwater runoff from additional impervious surfaces as a result of roads, sidewalks, trails, etc.	Transportation	Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors.	Apply roadside and catchbasin designs which divert runoff in an environmentally sensitive manner. Apply water runoff treatments such as bioswales or permeable pavers that eliminate stormwater runoff.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased stormwater system capacity	Transportation	Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors.	Apply roadside and catchbasin designs which divert runoff in an environmentally sensitive manner. Apply water runoff treatments such as bioswales or permeable pavers that eliminate stormwater runoff.
Increased stormwater runoff from additional impervious surfaces as a result of roads, sidewalks, trails, etc.	Transportation	Provide for commuter transit services that are accessible, efficient and safe.	Apply roadside and catchbasin designs which divert runoff in an environmentally sensitive manner. Apply water runoff treatments such as bioswales or permeable pavers that eliminate stormwater runoff.
Decreased stormwater system capacity	Transportation	Provide for commuter transit services that are accessible, efficient and safe.	Apply roadside and catchbasin designs which divert runoff in an environmentally sensitive manner. Apply water runoff treatments such as bioswales or permeable pavers that eliminate stormwater runoff.
Increased stormwater runoff from additional impervious surfaces as a result of roads, sidewalks, trails, etc.	Transportation	Create a walking environment that is accessible, safe, and enjoyable.	Apply roadside and catchbasin designs which divert runoff in an environmentally sensitive manner. Apply water runoff treatments such as bioswales or permeable pavers that eliminate stormwater runoff.
Increased stormwater runoff from additional impervious surfaces as a result of roads, trails, etc.	Transportation	Create a cycling environment that is accessible, safe, and enjoyable.	Apply roadside and catchbasin designs which divert runoff in an environmentally sensitive manner. Apply water runoff treatments such as bioswales or permeable pavers that eliminate stormwater runoff.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Increased stormwater runoff from additional impervious surfaces as a result of buildings, parking, etc.	Transportation / Sustainability & Resiliency	Create diverse mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Enact legislation that limits development coverage, establishes local wetland protection and requires stream corridor buffers. Require permeable pavement to reduce runoff and water quality and quantity designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands.
Decreased stormwater system capacity	Transportation / Sustainability & Resiliency	Create diverse mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Require stormwater basins and other designs to treat runoff in excess of "zero net increase" in a more environmentally friendly manner, such as rain gardens, bioswales, green roofs and artificial wetlands. Require maintenance agreements and cash posting to ensure upkeep of these systems.
Increased water consumption	Transportation / Sustainability & Resiliency	Create diverse mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Require water conservation measures such as low flow fixtures, grey water systems, drip irrigation, drought resistant native plantings, rain barrels, etc.
Decreased water supply	Transportation / Sustainability & Resiliency	Create diverse mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Continue to coordinate with the Rockland County Department of Health on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.

IMPACT ON WATER

Impact	Topic	Goal or Objective	Mitigation
Decreased sewerage capacity	Transportation / Sustainability & Resiliency	Create diverse mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Continue to coordinate with the Rockland County Sewer District #1 on site plan and subdivision review and work to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan to address this regional issue.

IMPACT ON AIR

Impact	Topic	Goal or Objective	Mitigation
Increased building emissions	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses.	Require energy efficient designs.
Increased building emissions	Economic Development	Work to ensure Zoning Code can accommodate new and upcoming commercial and industrial uses.	Require energy efficient designs.
Increased building emissions	Economic Development	Work to ensure that a variety of housing options exists within the Town	Require energy efficient designs.
Air pollution associated with vehicles	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses.	Increase public transportation options. Develop walking and bicycling options

IMPACT ON AIR

Impact	Topic	Goal or Objective	Mitigation
Air pollution associated with vehicles	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Increase public transportation options. Develop walking and bicycling options
Increased building emissions	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Require energy efficient designs.
Air pollution associated with vehicles	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Increase public transportation options. Develop walking and bicycling options
Air pollution associated with vehicles	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Increase public transportation options. Develop walking and bicycling options
Increased building emissions	Housing	Permit apartments over businesses	Require energy efficient designs.
Air pollution associated with vehicles	Housing	Permit apartments over businesses	Increase public transportation options. Develop walking and bicycling options
Increased building emissions	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Require energy efficient designs.
Air pollution associated with vehicles	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Increase public transportation options. Develop walking and bicycling options

IMPACT ON AIR

Impact	Topic	Goal or Objective	Mitigation
Increased building emissions	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Require energy efficient designs.
Air pollution associated with vehicles	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Increase public transportation options. Develop walking and bicycling options
Air pollution associated with vehicles	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Increase public transportation options. Develop walking and bicycling options
Air pollution associated with vehicles	Transportation	Implement a Complete Streets program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes.	Increase public transportation options. Develop walking and bicycling options
Air pollution associated with vehicles	Transportation	Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors.	Use hybrid-electric or other alternative-fuel engines that operate with less air pollution than standard combustion engines.
Air pollution associated with vehicles	Transportation	Provide for commuter transit services that are accessible, efficient and safe.	Use hybrid-electric or other alternative-fuel engines that operate with less air pollution than standard combustion engines.
Increased building emissions	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Require energy efficient designs.
Air pollution associated with vehicles	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Increase public transportation options. Develop walking and bicycling options

IMPACT ON PLANTS AND ANIMALS

Impact	Topic	Goal or Objective	Mitigation
Tree Removal	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses.	Tree replacement programs.
Tree Removal	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Tree replacement programs.
Overpopulation of wildlife, increased human/wildlife conflicts	Environmental Resources / Sustainability & Resiliency	Continue the acquisition of open space to preserve natural habitats	Implement a wildlife population control program.
Tree Removal	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers.	Tree replacement programs.
Tree Removal	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Tree replacement programs.
Tree Removal	Recreation, Parks & Open Space	Develop walking trails at Davenport Preserve.	Replant removed trees and vegetation. Re-route trail where possible.
Tree Removal	Recreation, Parks & Open Space	Construct a comfort station at King's Park.	Replant removed trees and vegetation.
Tree Removal	Recreation, Parks & Open Space	Construct pickle ball courts at Town parks and recreational facilities.	Replant removed trees and vegetation.
Tree Removal	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Replant removed trees and vegetation.
Tree Removal	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Replant removed trees and vegetation.
Tree Removal	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Tree replacement programs.

IMPACT ON AESTHETIC RESOURCES

Impact	Topic	Goal or Objective	Mitigation
Increased light pollution	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and that would not conflict with existing residential uses.	Use lighting design and policy that provides safe areas without excess glare.
Increased light pollution	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Use lighting design and policy that provides safe areas without excess glare.
Increased light pollution	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Use lighting design and policy that provides safe areas without excess glare.
Increased light pollution	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Use lighting design and policy that provides safe areas without excess glare.
Increased light pollution	Transportation	Create a walking environment that is accessible, safe, and enjoyable.	Use lighting design and policy that provides safe areas without excess glare.
Increased light pollution	Transportation	Create a cycling environment that is accessible, safe, and enjoyable.	Use lighting design and policy that provides safe areas without excess glare.
Increased light pollution	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Use lighting design and policy that provides safe areas without excess glare.

IMPACT ON OPEN SPACE AND RECREATION

Impact	Topic	Goal or Objective	Mitigation
Development of currently undeveloped land.	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses.	Require set aside for open space on site or acquisition of sensitive areas in the Town.
Development of currently undeveloped land.	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Require set aside for open space on site or acquisition of sensitive areas in the Town.
Development of currently undeveloped land.	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses.	Require cluster development and allow transferable development rights.
Development of currently undeveloped land.	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Require cluster development and allow transferable development rights.
Development of currently undeveloped land.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers.	Require set aside for open space on site or acquisition of sensitive areas in the Town.
Development of currently undeveloped land.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers.	Require cluster development and allow transferable development rights.
Development of currently undeveloped land.	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care..	Require set aside for open space on site or acquisition of sensitive areas in the Town.

IMPACT ON OPEN SPACE AND RECREATION

Impact	Topic	Goal or Objective	Mitigation
Development of currently undeveloped land.	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Require cluster development and allow transferable development rights.
Development of currently undeveloped land.	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Acquire additional open space.
Development of currently undeveloped land.	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Acquire additional open space.
Litter and debris generated around trails.	Recreation, Parks & Open Space	Develop walking trails at Davenport Preserve.	Begin anti-litter campaign and institute an educational program. Promote volunteer clean-up activities.
Litter and debris generated around facilities.	Recreation, Parks & Open Space	Construct a comfort station at King's Park.	Begin anti-litter campaign and institute an educational program. Promote volunteer clean-up activities.
Litter and debris generated around facilities.	Recreation, Parks & Open Space	Construct pickle ball courts at Town parks and recreational facilities.	Begin anti-litter campaign and institute an educational program. Promote volunteer clean-up activities.
Development of currently undeveloped land.	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Require set aside for open space on site or acquisition of sensitive areas in the Town.
Development of currently undeveloped land.	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Require cluster development and allow transferable development rights.

IMPACT ON TRANSPORTATION

Impact	Topic	Goal or Objective	Mitigation
Increased traffic congestion/decreased roadway capacity	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses.	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Economic Development	Work to ensure a variety of housing options exist within the Town	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Economic Development	Work to ensure a variety of housing options exist within the Town	Site developments in or near hamlet centers where pedestrian and transit infrastructure is strongest.

IMPACT ON TRANSPORTATION

Impact	Topic	Goal or Objective	Mitigation
Increased traffic congestion/decreased roadway capacity	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Site developments in or near hamlet centers where pedestrian and transit infrastructure is strongest.
Increased traffic congestion/decreased roadway capacity	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Site developments in or near hamlet centers where pedestrian and transit infrastructure is strongest.

IMPACT ON TRANSPORTATION

Impact	Topic	Goal or Objective	Mitigation
Increased traffic congestion/decreased roadway capacity	Housing	Permit apartments over businesses.	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Housing	Permit apartments over businesses.	Site developments in or near hamlet centers where pedestrian and transit infrastructure is strongest.
Increased traffic congestion/decreased roadway capacity	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Site developments in or near hamlet centers where pedestrian and transit infrastructure is strongest.

IMPACT ON TRANSPORTATION

Impact	Topic	Goal or Objective	Mitigation
Increased traffic congestion/decreased roadway capacity	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Promote public transit alternatives. Explore opportunities to expand roadway capacity (at the shoulder or median) to accommodate transit. Designate bus lanes. Create pull-offs for busses that minimize traffic conflicts at bus stops. Promote efficient travel through education and lane markings for cyclists and drivers.
Increased traffic congestion/decreased roadway capacity	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Site developments in or near hamlet centers where pedestrian and transit infrastructure is strongest.

IMPACT ON ENERGY

Impact	Topic	Goal or Objective	Mitigation
Increased energy consumption.	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses.	Require energy efficient designs.
Increased energy consumption.	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Require energy efficient designs.
Decreased gas and electricity capacity.	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and would not conflict with existing residential uses.	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid
Decreased gas and electricity capacity.	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid
Increased energy consumption.	Economic Development	Ensure that a variety of housing options exists within the Town	Require energy efficient designs.
Decreased gas and electricity capacity.	Economic Development	Ensure that a variety of housing options exists within the Town	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid
Increased energy consumption.	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Require energy efficient designs.

IMPACT ON ENERGY

Impact	Topic	Goal or Objective	Mitigation
Decreased gas and electricity capacity.	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid
Increased energy consumption.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Require energy efficient designs.
Decreased gas and electricity capacity.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid
Increased energy consumption.	Housing	Permit apartments over businesses.	Require energy efficient designs.
Decreased gas and electricity capacity.	Housing	Permit apartments over businesses.	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid
Increased energy consumption.	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Require energy efficient designs.
Decreased gas and electricity capacity.	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid
Increased energy consumption.	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Require energy efficient designs.
Increased energy consumption.	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Require energy efficient designs.
Decreased gas and electricity capacity.	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid

IMPACT ON ENERGY

Impact	Topic	Goal or Objective	Mitigation
Decreased gas and electricity capacity.	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid
Increased energy consumption.	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Require energy efficient designs.
Decreased gas and electricity capacity.	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Require energy efficient designs. Install solar panels on Town land to provide additional clean energy into the electric grid

NOISE AND ODOR IMPACT

Impact	Topic	Goal or Objective	Mitigation
Disturbances to adjacent property owners	Historic & Cultural Resources	Establish a plan to improve the maintenance of all publicly owned historic properties and abandoned cemeteries within the Town.	Direct public outreach to affected property owners.
Noise associated with additional vehicles	Transportation	Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors.	Use hybrid-electric or other alternative-fuel engines that operate with less noise pollution than standard combustion engines.
Noise associated with additional vehicles	Transportation	Provide for commuter transit services that are accessible, efficient and safe.	Use hybrid-electric or other alternative-fuel engines that operate with less noise pollution than standard combustion engines.

IMPACT ON PUBLIC HEALTH

Impact	Topic	Goal or Objective	Mitigation
Increased injury risk associated with higher travel speeds.	Transportation	Provide efficient travel between the Governor Mario M. Cuomo Bridge/I-287 corridor, Route 59 corridor, and other parts of Clarkstown.	Conduct enforcement and education programs (i.e. "Street Smarts" program). Implement Complete Street road designs that help calm traffic, such as "gateway" and "neck-down" treatments. Adjust traffic signal timing to moderate driving speeds.

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
Additional staff or municipal/community services.	Economic Development	Construct a database of information about the Town's commercial sector.	Explore sources for grants, government incentives, private funding and venture capital.
Additional staff or municipal/community services.	Economic Development	Enhance communication between the Town and the business community.	Explore sources for grants, government incentives, private funding and venture capital.
Additional staff or municipal/community services.	Economic Development	Continue the Office of Intergovernmental Relations/Economic Development to attract new businesses and assist business already established within the community.	Explore sources for grants, government incentives, private funding and venture capital.
Additional staff or municipal/community services.	Economic Development	Ensure that a variety of housing options exists within the Town.	Explore sources for grants, government incentives, private funding and venture capital.
Increased demand for school services	Economic Development	Ensure that a variety of housing options exists within the Town.	Continue to provide school districts with the opportunity to comment on large scale developments which increase residential density and require phased construction to allow school districts ample time to plan for increased enrollment

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
Additional staff or municipal/community services.	Economic Development	Create connections between the commercial sector and educational institutions.	Explore sources for grants, government incentives, private funding and venture capital.
Additional staff or municipal/community services.	Economic Development	Implement new programs, and continue those already in place, that beautify the Town, making it an attractive place in which to live and conduct business.	Explore sources for grants, government incentives, private funding and venture capital.
Change in neighborhood character.	Economic Development	Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and that would not conflict with existing residential uses.	Establish architectural guidelines and maximum height and bulk in proportion to surrounding areas.
Change in neighborhood character.	Economic Development	Work to ensure the Zoning Code can accommodate new and upcoming commercial and industrial uses.	Establish architectural guidelines and maximum height and bulk in proportion to surrounding areas.
Change in neighborhood character.	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Establish architectural guidelines and maximum height and bulk in proportion to surrounding areas.
Code violation.	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Create strict zoning requirements and establish regular enforcement efforts. Coordinate with justice court to ensure violators pay maximum penalty.
Increased demand for school services	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Continue to provide school districts with the opportunity to comment on large scale developments which increase residential density and require phased construction to allow school districts ample time to plan for increased enrollment

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
Additional staff or municipal/community services.	Economic Development	Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces.	Establish higher fees and fines to pay for additional personnel. Coordinate with justice court to ensure violators pay maximum penalty.
Reduced development potential.	Environmental Resources / Sustainability & Resiliency	Protect Clarkstown's ridgelines	Require cluster development and allow transferable development rights.
Increased cost of construction.	Environmental Resources / Sustainability & Resiliency	Protect and conserve both the sources and supply of potable water and the natural features which add to water quality.	Provide incentives for water re-use. Identify funding sources to offset costs. Educate developers and property owners regarding potential long term cost savings.
Reduced development potential.	Environmental Resources / Sustainability & Resiliency	Enact limits on total development coverage for all zoning districts.	Modify Floor Area Ratio or building height to compensate for reduced bulk area.
Reduced development potential.	Environmental Resources / Sustainability & Resiliency	Enact limits on total development coverage for all zoning districts.	Require cluster development and allow transferable development rights.
Reduced development potential.	Environmental Resources / Sustainability & Resiliency	Enact limits on total development coverage for all zoning districts.	Offer incentives to developers for a reduction in impervious areas.
Increased cost of new construction.	Environmental Resources / Sustainability & Resiliency	Continue to require stormwater management to a higher extent than currently applicable where development is proposed in watersheds which experience flooding.	Conduct a model study to compare the costs of additional stormwater management to the costs of property damage from flooding.
Reduced development potential.	Environmental Resources / Sustainability & Resiliency	Establish stream protection corridors	Modify Floor Area Ratio or building height to compensate for reduced bulk area.

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
Reduced development potential.	Environmental Resources / Sustainability & Resiliency	Establish stream protection corridors	Require cluster development and allow transferable development rights.
Reduced development potential.	Environmental Resources / Sustainability & Resiliency	Enact a wetland protection ordinance.	Modify Floor Area Ratio or building height to compensate for reduced bulk area.
Reduced development potential.	Environmental Resources / Sustainability & Resiliency	Enact a wetland protection ordinance.	Require cluster development and allow transferable development rights.
Change in neighborhood character.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers.	Establish architectural guidelines and maximum height and bulk in proportion to surrounding areas.
Increased demand for school services	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers.	Continue to provide school districts with the opportunity to comment on large scale developments which increase residential density and require phased construction to allow school districts ample time to plan for increased enrollment
Additional staff or municipal/community services.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers.	Establish higher fees and fines to pay for additional personnel. Coordinate with justice court to ensure violators pay maximum penalty.
Code violation.	Housing	Create zoning to encourage income adjusted housing for emergency service volunteers.	Create strict zoning eligibility requirements and regular enforcement efforts. Coordinate with justice court to ensure violators pay maximum penalty.
Additional staff or municipal/community services.	Health Safety & Welfare	Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are	Establish higher fees and fines to pay for additional personnel. Coordinate with justice court to ensure violators pay maximum penalty.

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
		enforced.	
Restricted use of property. Decreased property and resale values	Historic & Cultural Resources	Expand upon legislation to ensure that historic roadways, and those historic properties in private hands are not destroyed, or so renovated, by subsequent owners as to lose their historic status.	Create monetary incentives to offset the restrictions imposed on historic home owners by Town historic designation. Provide a real estate tax reduction by reducing the historical properties' assessed value by a to-be-determined percentage so that each owner receives the same relative financial consideration for accepting the imposition of historical property restrictions.
Tax increases associated with payments for maintenance and construction at historic sites.	Historic & Cultural Resources	Establish a plan to improve the maintenance of all publicly owned historic properties and abandoned cemeteries within the Town.	Seek grants. Institute incentive program such as "Adopt-a-Spot"
Change in neighborhood character.	Housing	Permit apartments over businesses.	Establish architectural guidelines and maximum height and bulk in proportion to surrounding areas.
Code violation.	Housing	Permit apartments over businesses.	Create strict zoning requirements and establish regular enforcement efforts. Coordinate with justice court to ensure violators pay maximum penalty.
Increased demand for school services	Housing	Permit apartments over businesses.	Continue to provide school districts with the opportunity to comment on large scale developments which increase residential density and require phased construction to allow school districts ample time to plan for increased enrollment

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
Additional staff or municipal/community services.	Housing	Permit apartments over businesses.	Establish higher fees and fines to pay for additional personnel. Coordinate with justice court to ensure violators pay maximum penalty.
Change in neighborhood character.	Housing	Adopt zoning that requires a set aside of new units for workforce and volunteer housing.	Establish architectural guidelines and maximum height and bulk in proportion to surrounding areas.
Code violation.	Housing	Adopt zoning that requires a set aside of new units for workforce and volunteer housing.	Create strict zoning eligibility requirements and regular enforcement efforts. Coordinate with justice court to ensure violators pay maximum penalty.
Increased demand for school services	Housing	Adopt zoning that requires a set aside of new units for workforce and volunteer housing.	Continue to provide school districts with the opportunity to comment on large scale developments which increase residential density and require phased construction to allow school districts ample time to plan for increased enrollment
Additional staff or municipal/community services.	Housing	Adopt zoning that requires a set aside of new units for workforce and volunteer housing.	Establish higher fees and fines to pay for additional personnel. Coordinate with justice court to ensure violators pay maximum penalty.
Change in neighborhood character.	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Establish architectural guidelines and maximum height and bulk in proportion to surrounding areas.

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
Additional staff or municipal/community services.	Housing	Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.	Establish higher fees and fines to pay for additional personnel.
Increased cost of new construction.	Sustainability & Resiliency	Implement programs which require and/or encourage environmentally sound construction methods, and building, subdivision and site design.	Prioritize building types/areas that would benefit the Town by using "green" designs. Identify funding sources to offset costs. Educate developers and property owners regarding potential long term cost savings.
Increased taxes associated with payments for maintenance and construction. Increase usage of park facility and infrastructure including parking and utilities.	Recreation, Parks & Open Space	Replace the existing soccer field at Zukor Park.	Charge leagues to use the fields.
Increased taxes associated with payments for maintenance and construction. Increase usage of park facility and infrastructure including parking and utilities.	Recreation, Parks & Open Space	Construct a comfort station at King's Park.	Apply for State and Federal grants. Consider the creation of a special recreation district to fund programs and facilities.
Increased taxes associated with payments for maintenance and construction. Increase usage of park facility and infrastructure including parking and utilities.	Recreation, Parks & Open Space	Continue to upgrade the equipment and infrastructure at Town park and recreational facilities to maximize the safety and benefit of residents.	Apply for State and Federal grants. Consider the creation of a special recreation district to fund programs and facilities.
Increased taxes associated with payments for maintenance and construction. Increase usage of park facility and infrastructure including parking and utilities.	Recreation, Parks & Open Space	Construct pickle ball courts at Town parks and recreational facilities.	Apply for State and Federal grants. Consider the creation of a special recreation district to fund programs and facilities.
Increased taxes associated with payments for acquisition, maintenance and construction.	Recreation, Parks & Open Space	Construct a multi-use, domed sport and recreational facility.	Charge leagues and participants to use facility.

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
Increased taxes associated with payments for acquisition, maintenance and construction.	Recreation, Parks & Open Space	Construct a fixed performance area for Town concerts and events.	Charge participants to use facility.
Increased taxes associated with payments for acquisition, maintenance and construction.	Recreation, Parks & Open Space	Develop walking trails at Davenport Preserve.	Apply for State and Federal grants. Consider the creation of a special recreation district to fund programs and facilities.
Relocation of residents or businesses due to acquisition of private property for new or widened roadways.	Transportation	Implement a Complete Streets program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes.	Work with residents and businesses to create an acceptable relocation plan.
Increased taxes associated with payments for acquisition, maintenance and construction.	Transportation	Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors.	Seek creative funding for bus infrastructure that is part of regional developments.
Increased taxes associated with payments for acquisition, maintenance and construction.	Transportation	Provide for commuter transit services that are accessible, efficient and safe.	Seek creative funding for bus infrastructure that is part of regional developments.
Change in neighborhood character associated with the addition of sidewalks.	Transportation	Create a walking environment that is accessible, safe, and enjoyable.	Build consensus through outreach and education programs.
Change in neighborhood character.	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Establish architectural guidelines and maximum height and bulk in proportion to surrounding areas.
Code violation.	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Create strict zoning requirements and establish regular enforcement efforts. Coordinate with justice court to ensure violators pay maximum penalty.

IMPACT ON GROWTH & CHARACTER OF COMMUNITY OR NEIGHBORHOOD

Impact	Topic	Goal or Objective	Mitigation
Increased demand for school services	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Continue to provide school districts with the opportunity to comment on large scale developments which increase residential density and require phased construction to allow school districts ample time to plan for increased enrollment
Additional staff or municipal/community services.	Transportation	Create mixed-use development areas that allow for walking, and biking and are well-served by public transportation.	Establish higher fees and fines to pay for additional personnel. Coordinate with justice court to ensure violators pay maximum penalty.

UNAVOIDABLE ADVERSE IMPACTS

Any particular adverse impacts not listed above would be associated with the specific development related to the land use policies of the Comprehensive Plan Update and would receive environmental review under the provisions of SEQRA by the applicable land use Board during the development review process. Unavoidable impacts associated with construction activities for municipal projects may include traffic, noise, dust and odor generation commonly associated with construction. These impacts would be temporary, and mitigated to the best extent possible.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Any particular irreversible and irretrievable commitment of resources associated with specific development related to the land use policies of the Comprehensive Plan Update would receive environmental review under the provisions of SEQRA by the applicable land use Board during the development review process. Town infrastructure projects including but not limited to roadways, sidewalks and Town facilities may include the use of building materials such as asphalt, steel, concrete, etc. These materials, along with the consumption of fossil fuels related to construction, would be irretrievable. While some land which is currently in a natural state may be utilized during these activities, the majority of this work would be repair and improvements of facilities and/roadways which have already been constructed and would not disturb existing natural areas.

VIII – Analysis of Alternatives

a) No Update to Comprehensive Plan

If the Town were to undertake no action with regard to updating the Comprehensive Plan, the 2009 Comprehensive Plan would continue to be the guiding document for land use development and zoning within the Town. Many of the goals of the 2009 Comprehensive Plan would potentially remain unfulfilled or only partially completed. The goals of steep slope protection and historic preservation, for example, can only be accomplished through specific implementable actions, as outlined in this document. Programs for the accommodation of new business and flexible zoning, as recommended in this updated Comprehensive Plan, are needed to accomplish the goals of economic development from the 2009 Plan. This updated Comprehensive Plan advances the earlier Plan, and without it, the 2009 Plan could not be successfully implemented.

Without the adoption of this updated Comprehensive Plan, the needs of the public as identified through outreach would be unmet and the recommended environmental protections would not be put into place. The Town could suffer from the impacts of unmitigated development: an increase in air and water pollution associated with unchecked energy and water consumption and automobile use; the lack of emergency service volunteers and young people due to unaffordable housing; a reduction in the quality of life from the loss of cultural and historic sites and open space; and a decrease in the Town's standard of living from reduced business opportunities. Likewise, there are also regional projects for which the Town needs to prepare. It is crucial that the Town assess the conditions of its State roadways and explore options for upgrades in safety and efficiency. Such programs require policy decisions that could be overlooked if not specifically called for in an updated Comprehensive Plan.

b) Adoption of Goals & Objectives and Plans Independently of Each Other

The Town of Clarkstown could simply carry out the plans it has developed since the adoption of the 2009 Comprehensive Plan, without updating and adopting a new Plan. The Town could take a piece-meal approach. However, the inter-relationships and potential conflicts between the goals and objectives of the Plan would not be addressed if they were acted upon independently. For example, increasing the Town's housing stock could put undue strain on the Town's existing transportation system causing traffic congestion. Without this Comprehensive Plan, the balancing of all of these elements would not be possible, which could result in ineffective or unintended outcomes and undue impact on the character of the Town's neighborhoods and environment, as well as an irresponsible and inefficient allocation of funds. Taking all of this into consideration, the most prudent action for the Town of Clarkstown would be to adopt this updated Comprehensive Plan.

IX – Conclusion

Properly planning for the future cannot be undertaken without an appreciation for the present. Through an extensive public outreach process, this Comprehensive Plan Update has catalogued what it is that makes Clarkstown a special place. By preserving the character of the Town's neighborhoods, ensuring the provision of first rate facilities for residents and protecting the natural environment, Clarkstown can move forward with a focus on the future, while protecting the established setting which defines our community.

This updated Comprehensive Plan took into account varying, divergent and sometimes even conflicting issues. A balanced response to these issues was required, and has been provided in the Plan. Several mechanisms helped achieve this balance; public outreach worked to ensure recommended policy was aligned with the voice of the people of Clarkstown. The Special Board worked to organize, analyze and respond to the input gathered during the public outreach phase of the Plan. This Comprehensive Plan addresses not only existing problems, but the problems that could arise through the accomplishment of the vision. Framing the Comprehensive Plan as a GEIS created an inseparable relationship between the Plan and the environment. All of these processes sought balance. This balance is reflected in the goals and objectives of the Comprehensive Plan, which strives to serve as a guide for the growth of the unique place that is the Town of Clarkstown.

X – Responses to Comments from the Correspondence on the Draft Comprehensive Plan Update/DGEIS

As per New York State Environmental Conservation Law 6 NYCRR Part 617.9 (b) (8), a Final GEIS must consist of the Draft GEIS, including any revisions or supplements to it; copies or a summary of substantive comments received and their source; and the Lead Agency's responses to all substantive comments. The following are the substantive comments on the Draft GEIS and Comprehensive Plan that were provided from Interested and Involved Agencies, as well as the public during the comment period that was established by the Town Board from April 20, 2021 through June 22, 2021. Comments were summarized from letters, e-mails and the transcript of the Town Board Public Hearing of June 1, 2021, the full extents of which are available in other sections of the Appendix. Recommendations were provided by the Clarkstown Planning Board, as well as the Rockland County Planning Department, who submitted their review pursuant to Section 239-m 3(a)(i) of the New York State General Municipal Law.

In many instances, comments resulted in revisions to the Plan and GEIS, which are noted in the responses below. In some cases, the responses provide further explanation or direct the commenter to sections of the Plan or Appendix which address the issue raised. The Draft Comprehensive Plan and GEIS offered the public "Recommendations" on the policies and practices the Town should undertake to guide it into the future. Based on the comments received, these Recommendations were revised and became the Goals and Objectives of the Final Comprehensive Plan and GEIS. As such, while the following comments may refer to the Recommendations of the Draft Comprehensive Plan and GEIS, responses refer to the corresponding Goals and Objectives found in this Final Comprehensive Plan and GEIS.

Comment 1.1 – (Thomas Reilly, April 23, 2021): I think the focus on developing mixed use is extremely important. There's a clear shortage of housing when values rise as high as they've gotten. The economic benefits of bringing in new residents, especially young professionals, who will spend a good portion of their money, is something that often goes unsung. I love hearing about building up local 'downtowns' with a focus on walkability and transport. One personal recommendation: don't sleep on the Congers downtown. I see a lot of potential there if we could just get some more residents!

Response 1.1: The Town recognizes the importance of the provision of a variety of housing types, including those in mixed-use environments, such as Hamlet Centers, and in accordance with the provisions the Comprehensive Plan and this proposed Update, will continue to explore new and innovate zoning and development options within these vital areas.

Comment 2.1 – (Mona Parker, April 29, 2021): As a tennis enthusiast, I am disappointed that there is no discussion of upgrading and ideally adding to the two town tennis courts that are currently available in Congers. There are really no public options for tennis players in the town. Further, the high school tennis courts are often not available to the public on weekends, even during the summer months. While pickle ball courts will certainly be a welcome addition, there

remains a large and vibrant tennis community in the town. We are often forced to travel outside the county to play.

Response 2.1: The Recreation & Open Space goal concerning the construction of additional pickle ball courts was drafted in response to the number of requests received for such facilities. However, while tennis courts are not specifically mentioned, the Town is constantly working to expanding its recreation facilities in line with the goal to “Continue to upgrade the equipment and infrastructure at Town park and recreational facilities to maximize the safety and benefit of residents.”

Comment 3.1 – (Nancy Hughes, May 8, 2021): Clarkstown seems to have subsidized senior housing, assisted living, and Atria. Where, oh where, is affordable unsubsidized senior housing - particularly in light of the fact that 31,727 people are over the age of 55, representing 36% of the Town population. Atria can be eliminated as affordable unsubsidized senior housing, since their rental rates are exorbitant: a 344-389 sq. ft. studio starts at \$6,095; a 536-689 sq. ft. 1 bedroom starts at \$6,695; and only one 762-927 sq. ft. two bedroom starts at \$8,795. Schimpf Farm's property has been proposed as senior housing and it seems to be taking years to get a shovel in the ground. Please consider the senior population when plans for Clarkstown are finalized.

Response 3.1: For the Updated Comprehensive Plan, the housing goal concerning senior housing was expanded to read “Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care.” The Town currently has several senior housing developments under review by the Planning Board permitted by the Active Adult Residence (AAR) floating zone and Senior Housing Special Permit. Additionally, the Nanuet Transit-Oriented development zoning was applied around the area of the Nanuet rail stop and is designed to attract market-rate multifamily development by limiting apartment sizes and bedroom counts.

Comment 4.1 – (Erwin Ryno, May 12, 2021): I like to suggest the recreation and parks office be moved to the Germonds pool area. It would be a central location for ALL Clarkstown residence. And since we have to renew our pool passes every year and drive a long way, it should be central for everyone. I come from the corner of West Nyack and it's a long way to travel. The office can also service the pool entrance at the same time and the Zukor office can become another class room facility for more senior activity.

Response 4.1: The Recreation & Parks offices were relocated to Zukor Park to take advantage of the existing buildings and facilities at that location. As these offices were also recently renovated and updated, there are currently no plans for their relocation.

Comment 5.1 – (Louis Lanicci, May 14, 2021): I would like for the town to consider zoning modifications on two parcels of land in Central Nyack. 65.7-3-73 also known as 70 route 59 to multi use and 65.7-3-75 to commercial shopping. These parcels would conform to present uses in the area.

Response 5.1: In keeping with the Economic Development goals “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or

underutilized commercial spaces” and “Work to ensure the Town’s Zoning Code and accommodate new and upcoming commercial and industrial uses,” the Town will continue updating and modifying the Zoning Code and Map to accommodate expanded and updated uses.

Comment 6.1 – (Sabrina Tenteromano, May 14, 2021): Can you perhaps share your thoughts on the viability of expanding current agricultural sites or reviving former sites (under the ownership of the Town or ones that can be purchased by the Town) and integrating this into the Comprehensive Town Plan? Do you see a connection between agriculture and community benefits in Clarkstown? Can this be expanded on in the Comprehensive Town Plan update to generate revenue, create agro tourism jobs, improve air quality (currently D rated), and food sovereignty?

Response 6.1: Several parts of the Comprehensive Plan discuss the importance of continuing our Open Space acquisition program. Farmland protection is part of the Open Space program. The Town contributed to the acquisition of Cropsey Farm in order to ensure that the farming operation there would continue. The Town also acquired the Traphagen property (which is surrounded by Germonds Park) and worked with the Farm Alliance to conduct farming there for one year. The Town is also working on restoring the structures at the property and working with Heritage of West Nyack on bringing farming to that location again.

Rockland Country Day School is another acquisition that came with an organic garden that was run by the former school. The Town is working to have the buildings rented and could potentially create a community garden in that location. All of these initiatives will help with agro-tourism, air quality and food sovereignty as you have mentioned, along with educating our residents about the Town's history.

Comment 7.1 – (Clarkstown Planning Board, May 14, 2021): The Planning Board expressed concern regarding the possibility for unrestricted residential development associated with the goal of permitting apartments over business in the hamlet centers and the expansion of residential uses in areas that are currently zoned for retail uses. The Planning Board recommends that any future legislation allowing this type of housing include a unit cap in an effort to avoid overburdening local resources and the local school districts.

Response 7.1: The Plan has been edited to include the consideration of unit caps for this type of residential development.

Comment 8.1 – (Rockland County Planning Department, May 20, 2021): Within the Background section of the Plan, it is noted that a Special Board was created to prepare the 2009 Plan (page 8). After its adoption, the Board was retained to implement the Plan's goals and objectives. The Special Board was also tasked with managing this update to the 2009 Comprehensive Plan. It should be stated in this section if the Board will continue to carry out the goals of the update after its adoption, or if the Board will be dissolved.

Response 8.1: Upon adoption of the updated Plan, it is anticipated that the Special Board will remain constituted and begin work on implement the updated goals and objectives. A reference regarding the future of the Special Board has been added to the Plan.

Comment 8.2 – (Rockland County Planning Department, May 20, 2021): On pages 8-9, different studies that were used by the Special Board during the creation of the 2009 Plan are listed. One of them is the un-adopted 2001 Comprehensive Plan for Rockland County titled "River to Ridge: A Plan for the 21st Century." In 2011, the County officially adopted a Plan titled "Rockland Tomorrow: Rockland County Comprehensive Plan." The list of studies and reports available for the Comprehensive Plan Update should be updated to include this Plan.

Response 8.2: A reference to the adopted Rockland County Comprehensive Plan has been added.

Comment 8.3 – (Rockland County Planning Department, May 20, 2021): Starting on page 11, and continuing throughout the document, when referring to something that is found in the Appendix, the Plan will state "See Appendix" in parenthesis. However, the Appendix is currently 2,335 pages, and is broken up into ten sections, three of which are reserved for future correspondence and public hearing minutes related to the adoption of the Plan. As this is a very long document, the references to the Appendix in the main body of the document should also refer to a specific section or page to help readers navigate to the correct page with ease. In addition, in the Table of Contents for the Appendix, it would be beneficial to state what page each section begins on. It may also be helpful to give the page number for each of the studies found in Section V, as many of these documents are very long and are what comprise a majority of the Appendix.

Response 8.3: The appendix is comprised of a number of scanned documents, and is in a digital format which is tabulated by section, searchable and posted online. The plan has been modified to reference the specific section numbers of the appendix, but not page numbers within, as references in the Plan to items in the appendix are almost entirely made in general terms and do not refer to the specific contents of documents in the appendix.

Comment 8.4 – (Rockland County Planning Department, May 20, 2021): The first full paragraph on page 21 should include a reference to Chart 2, as that is where the information being discussed originates.

Response 8.4: A reference to Chart 2 has been added.

Comment 8.5 – (Rockland County Planning Department, May 20, 2021): Section V covers the goals and objectives for the eight central topics of the Plan. Subsection a) details information on economic development within the Town (beginning on page 20). Of the ten goals listed at the end, only five are actually discussed in the body of the subsection. Each of the goals and/or objectives should be further explained within the subsection so that more information can be provided as to what they are and why they are important enough to the Town to be considered a goal of the Plan. For example, one of the goals not discussed is to "Implement new programs and continue those already in place to beautify the Town, making it an attractive place in which to live and conduct business." More information should be provided within the body of the Economic Development subsection that details programs that are already in place to preserve and

enhance the beauty of the Town. Examples of potential new programs should also be included to help guide the future of the beatification of the Town in relation to economic development. This comment is also true for the seven additional central topics covered in Section V. While we encourage the Town to continue to develop goals such as the establishment of stream protection corridors (found in the goals for the Water Resources portion of the Environmental Resources subsection), it is important to establish the meaning behind each one and detail their importance in the main body.

Response 8.5: In order to avoid repetition and redundancy in the text of the Comprehensive Plan, the first section of each main chapter is structured to provide an “existing conditions” overview and a synopsis of the needs and current efforts underway for each chapter category. The goals and objectives are listed and described at the end of each chapter, as they are the product of the needs discussed prior in each chapter. This is a stylistic decision intended to make the document as concise and accessible and possible and is in line with a standard structure of an Environmental Impact Statement.

Comment 8.6 – (Rockland County Planning Department, May 20, 2021): A major topic discussed within the body of the Economic Development subsection is Route 303, found on page 22. However, no goal/objective is established for this roadway. Two of the studies prepared for the Town recommended that Route 303 be considered for infrastructure improvements, as it is a prime area for commercial and industrial development. The Town has further considered designating the area as "the Congers Corporate Corridor," to increase recognition. Without listing these ideas as a goal, it signifies the Town is not serious in considering the Route 303 corridor as an area for economic development. By establishing a goal dedicated to the Route 303 area, it will ensure that future consideration and attention is given towards providing methods to improve the area and increase recognition of the development opportunities offered. The Town should consider implementing an overlay zone, similar to the Route 303 Overlay Zoning District established by the Town of Orangetown. This overlay zone was designed to promote safety and control traffic, protect and buffer the viewshed of the natural areas, preserve the nearby parks and open space, promote the economic viability and commercial development of the Route 303 corridor, and protect the surrounding residential areas. By creating something similar, the Town will help to establish the economic viability of the area while preserving the aesthetic resources of the corridor.

Response 8.6: The Town’s serious commitment has been demonstrated by the Town’s extensive efforts in lobbying County and State representatives to provide the funding for the New York Metropolitan Transportation Council (NYMTC) Studies. The upcoming studies of Routes 303 and 304 will be extensions of, and modeled from, the Orangetown Sustainable Development Study of Route 303 which was also funded by NYMTC; a reference to this has been added to the Plan.

Comment 8.7 – (Rockland County Planning Department, May 20, 2021): The last goal of the Economic Development subsection (found on page 26) is the potential implementation of a transfer of development rights program. Within this goal, it is mentioned that this program could increase development in targeted areas, while decreasing density in areas selected for

conservation. It should be clarified if this program will only be permitted in certain non-residential zoning districts, or if it will be allowed throughout the entire Town.

Response 8.7: The referenced goal, calls for the Town to “consider” a transfer of development rights program. At this time, the program is only a suggestion and no details have been developed.

Comment 8.8 – (Rockland County Planning Department, May 20, 2021): The Route 59 corridor is the major retail hub of the Town and County. Given that the establishments within this corridor have developed over time, there is no cohesive theme relating the stores or strip malls to each other; rather they have developed in a hodgepodge style. Since this corridor is highly visible to Clarkstown residents, other County residents, and non-County residents, a recommendation for facade and streetscape improvements should be included that could enhance the appearance of this corridor. The Town should also consider creating a Route 59 Overlay zone, similar to the one mentioned above for Route 303.

Response 8.8: The text following the Transportation goal “Add to the economic strength and quality of life in Clarkstown by coordinating with Mario M. Cuomo Bridge reconstruction and other regional transportation initiatives,” states the Town will “continue to lobby for a study of Route 59 in Clarkstown,” similar to those planned for Routes 303 & 304 and those that have been conducted elsewhere in the County along Route 59. The Environmental Resources goal, “Implement design standards for future construction,” would entail façade and streetscape improvements, as well as the Economic Development goal, “Implement new programs and continue those already in place that beautify the Town, making it an attractive place in which to live and conduct business.”

Comment 8.9 – (Rockland County Planning Department, May 20, 2021): On page 44, Figure 14 has a symbol for "Scrub/Shrub Swamp" that is very similar to the color used for lakes and streams. It is very difficult to distinguish between the two features on the map. A different color should be used to represent this swamp feature so it can be more easily seen.

Response 8.9: The color for the "Scrub/Shrub Swamp" symbol has been adjusted on Figure 14.

Comment 8.10 – (Rockland County Planning Department, May 20, 2021): The goal at the bottom of page 49 for Water Resources is to require stormwater management to a higher extent than is currently applicable. The paragraph detailing this goal states that the Town now requires this. Therefore, the heading for this goal should be updated to state that the Town will "Continue to require stormwater management to a higher extent than is currently applicable where development is proposed in watersheds that experience flooding."

Response 8.10: The title of the goal has been changed to "Continue to require stormwater management to a higher extent than is currently applicable where development is proposed in watersheds that experience flooding."

Comment 8.11 – (Rockland County Planning Department, May 20, 2021): One of the goals of the Aesthetic Resources portion of the Environmental Resources subsection (found on page

55) is to "Implement design standards for future construction." It is mentioned in the body of the subsection that the Town is looking to add design standards for the MF zoning district by adapting those already in place for the Hamlet Center districts. Additional design standards for other areas within the Town must also be considered. Protection for the aesthetics of the major lakes, which are mentioned throughout this subsection and the document, could be implemented. This could be achieved through the creation of an overlay district or the implementation of height and/or bulk restrictions. The Palisades Ridge is also a great aesthetic resource for the Town. The use of earth-toned building materials could be recommended so that residential structures blend in with the scenic backdrop of this area. A ridgeline protection ordinance should also be considered.

Response 8.11: The Plan has been modified to expand the goal text following "Implement design standards for future construction," to encompass more areas of the Town. The goal "Protect Clarkstown's ridgelines," is included in the Environmental Resources section of the Plan. Design standards for single-family homes on ridgelines have been implemented by the Planning Board through subdivision approval in the past. The use of earth tone-materials will be taken into considerations as the Town implements the goals of "Preserve the suburban and remaining semi-rural character of the Town," and "Implement design standards for future construction."

Comment 8.12 – (Rockland County Planning Department, May 20, 2021): On pages 47 and 55, the Environmental Resources subsection promotes the creation of Critical Environmental Areas to further protect certain locations within the Town. We support the Town's effort to create such areas, as this will require more stringent review of any development through the SEQRA process. The Town should consider taking this protection a step further, by establishing Environmentally Sensitive Sites or Features, similar to the provision of the same name, found in Article XIX of the Village of Piermont Zoning Code. This Village law establishes additional protection for water resources, wetlands, floodways, ridgelines, rock outcroppings, and steep slopes within the Village; the entirety of which is designated as a Critical Environmental Area. Methods to protect these features include buffers, lot area deductions, and additional bulk regulations.

Response 8.12: The description following the Environmental Resources goal, "Designate Critical Environmental Areas in Clarkstown," has been expanded to include the consideration of designating Environmentally Sensitive Sites and Features.

Comment 8.13 – (Rockland County Planning Department, May 20, 2021): On page 58, it is noted that a Comprehensive Transportation Plan was created as part of the 2009 Plan, with portions of the study reflected in the Transportation section of the Plan. As this was part of the Comprehensive Plan, it should be stated whether this document is also receiving an update at this time.

Response 8.13: The Clarkstown Comprehensive Transportation Plan was not updated as part of this Comprehensive Plan Update. Changes to the municipal and regional transportation network that have occurred since the completion of the Transportation Plan are covered in the updated Transportation section of the Comprehensive Plan.

Comment 8.14 – (Rockland County Planning Department, May 20, 2021): In the paragraph on Mixed Use Hamlet Center Zoning in the Housing subsection on page 70, it is noted that more needs to be done in the Hamlet Center, Neighborhood Shopping, and Transit Oriented Development (TOD) zones as little development has occurred since they were established. We encourage the Town to pursue methods to develop these areas, however little is said on how this will be achieved. Several goals for the Housing subsection could be applied to help with the advancement of these areas. By adopting zoning that requires a certain percentage of new units be set aside for people in the workforce or volunteers, this will encourage more people to buy or rent in the area who might not otherwise be able to afford to live in these zones. While apartments over businesses are already permitted in most areas mentioned above, expanding this concept, and potentially altering the code that regulates them, may make these types of units more desirable to construct and subsequently buy/rent. This section must be expanded upon to state how the Town will modify these zoning districts, or if additional studies are required to better understand the best methods to develop these areas.

Response 8.14: As zone changes are implemented additional analysis will be considered, if necessary. This information has been added to the Plan.

Comment 8.15 – (Rockland County Planning Department, May 20, 2021): Found at the bottom of page 71, the first goal of the Housing Subsection is to "Permit apartments over businesses." Allowing this mixed-use is beneficial for the Town as it can increase density to meet the housing needs of the Town in areas that are already able to handle a larger capacity of people. The Hamlet Centers are specifically called out for this type of development. However, apartments are already permitted over businesses in the Hamlet Centers, as well as the other zones mentioned in the subsection - Neighborhood Shopping and the Transit Oriented Development zones (except TOD 1). Therefore, this goal should be altered to specifically focus on the need for additional enforcement of the regulation of these units.

Response 8.15: The intent of the goal is to consider the expansion of permissions for residential units over businesses. Issues of enforcement are covered under the Health, Safety and Welfare goal, "Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced."

Comment 8.16 – (Rockland County Planning Department, May 20, 2021): Another goal of the Housing subsection on page 72 is to "Adopt zoning that requires a set aside of new units for workforce and volunteer housing." Within this goal, it specifies the development of appropriate housing for seniors and volunteer emergency service workers. As the following goal is directed specifically toward senior housing, it is likely the "housing for seniors" was an error and should be related to housing for people in the workforce. This must be clarified.

Response 8.16: The goal text has been updated to correct this typo.

Comment 8.17 – (Rockland County Planning Department, May 20, 2021): On page 75, it is stated that the Town is continuing to look for locations to construct a new multi-use, domed sports and recreational facility and a permanent area for concerts and events. It should be

clarified if the Town is looking to construct these at existing park or recreation areas or if other locations are also being considered. It is mentioned previously in the Plan that, in addition to the Town's commitment to acquiring and preserving open space, vacant land is becoming scarce. If the Town is considering locations beyond existing parkland/recreation facilities, it should place existing underutilized areas at the forefront for this development rather than the use of vacant land.

Response 8.17: In addition to placement at an existing Town facility, the Town will consider the placement of the domed sports facility in an underutilized developed area to the extent feasible. The Town is considering placement of a fixed performance area at Germonds Park. The Plan has been expanded to include this information.

Comment 8.18 – (Rockland County Planning Department, May 20, 2021): The discussion related to bicycle facilities on page 82 notes that there is currently no network of bicycle routes and that the bicycle facilities that do exist are primarily within the eastern portion of Town. The goal on page 90 states the Town will work with the State and County to incorporate bicycle facilities into their road design and construction. It should be clarified if the goal is to create a connected network, or if the inclusion of additional facilities will provide more, unconnected, locations for cyclists throughout the Town.

Response 8.18: The Transportation goal section text has been modified to clarify that the goal is to create a connected cycling network.

Comment 8.19 – (Rockland County Planning Department, May 20, 2021): Within the Transportation subsection on page 82, Complete Streets is mentioned. At the end of the paragraph, it is mentioned that the Complete Streets Committee created criteria for selected projects and ranked over 700 road segments to produce a prioritized list for use when considering roadway upgrades. The criteria used to select projects, as well as the prioritized list should be included as part of this section (or included in the Appendix if necessary).

Response 8.19: This information has been added to the Appendix.

Comment 8.20 – (Rockland County Planning Department, May 20, 2021): Figures 25 and 26 (pages 85 and 86) are referenced at the end of the Complete Streets paragraph, and illustrate the Complete Streets project selection by road segment and road length. The legends include a road segment score and road length score, respectively. It is never explained as to what these scores mean, or how they were calculated. An explanation should be provided in the context of the paragraph on Complete Streets.

Response 8.20: This information has been added to the Appendix.

Comment 8.21 – (Rockland County Planning Department, May 20, 2021): On page 88, a goal of the Transportation subsection is to implement a Complete Streets Program. It is noted in the body of the subsection that this Program has already been started. The goal needs to be updated to state that the Town wishes to further the implementation of the Program.

Response 8.21: The title of the goal has been changed to "Continue to Implement the Complete Streets Program which ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes."

Comment 8.22 – (Rockland County Planning Department, May 20, 2021): The Complete Streets Program is the basis for several other goals in this subsection. We encourage the Town to pursue this objective, as Complete Streets are designed to prioritize safety and access for all who use the roadway. They often include traffic calming methods, wider sidewalks, attractive streetscapes, and dedicated bike and/or bus lanes, where appropriate. Two figures (Figures 25 and 26) are provided that illustrate the 700 roadways that are targeted for potential road upgrades in line with the Program. As previously mentioned, it is unclear from the maps which roadways are higher priority, and where the Town actually wishes to make these upgrades. The Plan should include specific locations that are targeted for the Complete Streets Program.

Response 8.22: This information has been added to the Appendix.

Comment 8.23 – (Rockland County Planning Department, May 20, 2021): As noted above, the Complete Streets Program is a running theme among the goals of the Transportation subsection. The two goals related to public transportation services (pages 88 and 90) reference utilizing the Program for future transit planning. It should be further explained how the Program will be applied. Methods can include providing dedicated bus lanes on certain major roadways, adding additional transit stops, ensuring there are bus pullouts, or giving signal priority to transit.

Response 8.23: A summary of the “toolbox” of options for Complete Streets implementation may be found in the Appendix, on page 5 of the Clarkstown Complete Street Committee Guide – 2017 and are summarized in the Sustainability and Resiliency chapter of the Plan under “Transportation.”

Comment 8.24 – (Rockland County Planning Department, May 20, 2021): The goal to create a walking environment in the Transportation subsection (page 90) specifically mentions the Hamlet Centers. However, within the body of the subsection, it is mentioned that connectivity between hamlets or residential areas and denser commercial districts are lacking. The goal should be updated to incorporate providing this connection so people living in the residential and hamlet areas can more easily access the commercial centers by foot.

Response 8.24: The text following the goal: “Create a walking environment that is accessible, safe, and enjoyable,” has been expanded to include mention of the strengthening of pedestrian networks between Hamlet Centers, residential areas and commercial districts.

Comment 8.25 – (Rockland County Planning Department, May 20, 2021): On page 93, LEED is used for the first time. This should be spelled out and the terminology explained so that readers understand what LEED certification involves.

Response 8.25: This reference to LEED has been expanded to include the unabbreviated name of the program.

Comment 8.26 – (Rockland County Planning Department, May 20, 2021): The paragraph on Transit Oriented Development (TOD), found on pages 93-94, seems out of place within the Sustainability & Resiliency subsection. While TOD can encourage sustainable development, this paragraph only explains what the plans for the TOD zoning are, rather than how they can contribute to sustainability. The description provided seems like it would better fit into the Economic Development and/or Housing subsections. More information must be provided as to how the TOD zoning will help the sustainability and resiliency efforts of the Town.

Response 8.26: The TOD section of the Sustainability & Resiliency chapter has been expanded to include examples of the environmental benefits of this zoning. To avoid repetition and redundancy within the text of the Comprehensive Plan, this section will remain in the Sustainability & Resiliency chapter of the Plan.

Comment 8.27 – (Rockland County Planning Department, May 20, 2021): Similarly, the Complete Streets Initiative portion of the Sustainability & Resiliency subsection (page 94) does not go into detail on how it will aid in the sustainability efforts of the Town. The paragraph gives a good description of improvements that could be made as part of the Initiative, of which the Transportation subsection is currently lacking. The information provided should be included in the Transportation subsection, and more information provided as to how the stated methods actually contribute to a more resilient and sustainable Town.

Response 8.27: The Complete Streets section of the Sustainability & Resiliency chapter has been expanded to include examples of the environmental benefits of the program. To avoid repetition and redundancy within the text of the Comprehensive Plan, this information will remain in the Sustainability & Resiliency chapter of the Plan.

Comment 8.28 – (Rockland County Planning Department, May 20, 2021): On page 96, electric vehicle charging stations are briefly discussed, including the notation that charging stations were installed at the Palisades Center, the Shops at Nanuet, and Town Hall. In the Impact on Air portion of Section VII (pages 122-124), the mitigation method for the "air pollution associated with vehicles" includes the use of hybrid-electric or other alternative-fuel engines. As hybrid vehicles become more prevalent, and as the Town is promoting their use, a goal of the Sustainability & Resiliency subsection should be for the increase in charging station locations throughout the Town. Other Town-owned facilities should be considered for electric vehicle charging stations, such as community centers, libraries, schools, and municipal parking lots. In addition, charging stations could be a provision Planning Board members may wish to request during the site plan review of larger developments where people will spend longer times, such as new hotels and alterations to shopping centers/strip malls.

Response 8.28: The goal "Develop programs to reduce greenhouse gas emissions," within the Sustainability & Resiliency section makes multiple references to the promotion of programs, transportation options and development patterns which "reduce or regulate emission." The installation of additional EV charging stations falls under this intent. The Plan has been expanded to reference EV stations in the text following this goal.

Comment 8.29 – (Rockland County Planning Department, May 20, 2021): In 2018, the County created an All-Hazard Mitigation Plan (HMP), which was adopted by the Town. The HMP identified drought, flooding, severe storms, winter storms, and wildfire as high risks for Clarkstown. The Water Resources portion of the Environmental Resources subsection (pages 31-38) addresses flooding. Flooding is also discussed on pages 97-98 in terms of resiliency, as well as severe storms. Information on how the Town can/will mitigate drought, winter storms, and wildfire risks should also be included in the Sustainability & Resiliency subsection so that all high hazard risks established in the HMP are addressed.

Response 8.29: References to the All-Hazard Mitigation Plan (HMP) have been added to the Environmental Resources and Sustainability & Resiliency sections of the Plan.

Comment 8.30 – (Rockland County Planning Department, May 20, 2021): On page 102, the Land Use Changes portion of the Implementation section mentions amendments to the Town's RS and MRS zoning districts. This is not mentioned in the Goals and Objectives section. If the Town wishes to amend these two zones to accommodate new commercial and residential development, it should be discussed within the Economic Development and Housing subsections of the Plan.

Response 8.30: The proposed analysis of land uses within the RS and MRS zoning districts is envisioned as the first part of the implementation of the Economic Development goals to “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces” and “Work to ensure the Town’s Zoning Code and accommodate new and upcoming commercial and industrial uses.” The RS and MRS zones contain the Town’s largest commercial developments and the majority of the types of businesses currently experiencing changes in demand/utilization. As such the Town will begin its analysis with these zones, while other zoning districts may be considered for such analysis in the future as mentioned in the Implementation section of the Plan.

Comment 8.31 – (Rockland County Planning Department, May 20, 2021): In the Impact on Water portion of Section VII (pages 110-121), the mitigation proposed for several impacts involves participating in the development of the County Comprehensive Plan. While the County Plan was in development at the time the 2009 Town Plan was adopted, it was adopted in 2011. There is currently no endeavor to update or create a new County Plan at this time. The reference to the development of the County Comprehensive Plan must be removed or edited to allude to any future updates to the plan.

Response 8.31: The references to the County Comprehensive Plan within the Impact on Water portion of Section VII have been removed and replaced with references to the Rockland County Comprehensive Water Conservation and Implementation Plan.

Comment 8.32 – (Rockland County Planning Department, May 20, 2021): In the Impact on Air portion of Section VII (pages 122-124), the mitigation method for the "air pollution associated with vehicles" includes the use of hybrid-electric or other alternative-fuel engines. This idea should be presented in the Sustainability & Resiliency subsection, and possibly the Transportation subsection. It should be stated what vehicles the Town is referring to when

mentioning these types of engines. Will this be for public transportation, Town-owned vehicles, or will the Town encourage residents to purchase hybrid-electric vehicles?

Response 8.32: The referenced “hybrid-electric or other alternative-fuel engines” are part of suggested mitigation to a possible impact related to the Plan and not meant to implied as goals and objectives of the Plan. However, the Sustainability & Resiliency section makes multiple references to the promotion of programs, transportation options and development patterns which “reduce or regulate emission.” At this point, the Town does not have specific plans on what type of hybrid vehicles it may purchase nor how such vehicles would be utilized.

Comment 8.33 – (Rockland County Planning Department, May 20, 2021): A header or footer should be included on each page to notate the chapter/subsection of the Plan so it is easier to locate the different topics and issues that are discussed.

Response 8.33: An extensive Table of Contents is included in the Plan, and the chapters are generally brief. Headers and footers will not be added to the Plan.

Comment 8.34 – (Rockland County Planning Department, May 20, 2021): Listed below are typographical, punctuation, format, and update errors that we observed while reviewing the document:

Page 8, first paragraph, third full sentence- remove the word "have" between "since" and "implemented." Page 10, first paragraph in section c), last sentence- this should indicate it is the 2009 Comprehensive Plan.

Page 13, third paragraph, first sentence- remove the word "the" between "of" and "both."

Page 14, last paragraph, fifth sentence- add the word "in" between "Railroad" and "about."

Page 15, last paragraph, second sentence- "Rockland State Park" should be corrected to "Rockland Lake State Park."

Page 15, last paragraph, last sentence - Route 9W is a U.S. Route, not a State Route.

Page 22, last paragraph, third sentence- this states the Nanuet Mall was redeveloped in 2003. This should be corrected to 2013.

Page 22, last paragraph, fourth sentence- correct "Palisades Center more" to "Palisades Center Mall."

Page 27, first paragraph, first sentence- add an "s" to the end of the word "attract."

Two pages are listed as 67. The page that begins with subsection e) Housing should be page 68, with all subsequent pages corrected.

Page 69, first paragraph, penultimate sentence- "increased" should be changed to "increasing."

Page 71, first full paragraph, fifth sentence- add the word "and" between "21 units per acre" and "to allow."

Page 71, last paragraph, second sentence- remove the word "is" between "Clarkstown" and "makes."

Page 77, third paragraph, first sentence- the period after "programs" is colored red. This should be corrected to black to match the rest of the document.

Page 78, first full paragraph, third sentence- "allow more a more" should be corrected to remove the first "more."

Page 78, second full paragraph, first sentence- correct "trials" to "trails."

Page 82, last paragraph, last sentence- a period is missing at the end of the last sentence. Page 88, second paragraph, second sentence- remove "of" between "in" and "all."

The Transportation subsection includes a section on Land Use followed by one on Quality of Life. The Goals and Objectives portion orders it as Quality of Life followed by Land Use. The Goals and Objectives portion should reverse the ordering, so that the goals maintain the same order as the main body of the subsection, or vice versa.

Page 99, second full paragraph, second sentence- remove the first or last alternative/s from "alternative transportation alternatives."

Page 101, Inter-Municipal Agreements paragraph, last sentence- add the words "as with" between "such" and "the."

Starting with the first mitigation method on page 112- add the word "as" between "such" and "rain." This must be applied to several of the mitigation methods within the Impact on Water portion.

Page 145, first paragraph, last sentence- "2000 Plan" should be corrected to "2009 Plan."

Response 8.34: All corrections have been made.

Comment 9.1 – (Martha Snider, May 27, 2021): Thank you for listening to the long-term and newer residents of Clarkstown. In order for Clarkstown to continue to thrive we have to both retain our current residents, and find ways to entice people to want to move to our area. I am happy to see that you have incorporated my comments about MRS zoning for residential use into the updated draft plan. Hopefully we can move forward quickly from the past year as I am looking to move back to Clarkstown when more housing options become available.

Response 9.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 10.1 – (Palisades Center Tenants, May 28, 2021): We are collectively writing this letter to communicate our strong support for the Town of Clarkstown’s Comprehensive Plan. We invested in Clarkstown based on the benefits that the Palisades Center provides, including its location adjacent to the Interstate. It is promising to see the Town’s Comprehensive Plan specifically highlight the need to analyze and modify Major Regional Shopping zoning districts to permit residential living units. Major retail centers worldwide have already started implementing this new trend and businesses within those centers are experiencing greater prosperity. Giving the Palisades Center every necessary tool to revitalize following the pandemic is important to us and the people we employ.

Response 10.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 11.1 – (Roy Tschudy, May 28, 2021): I appreciate you considering my original comment on the Comprehensive Plan regarding the state of retail and giving retail venues the opportunity to full evolve. I believe this is the right direction for the future of Clarkstown and I look forward to following the progress.

Response 11.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 12.1 – (Barbara Pfingst, May 31, 2021): The Comprehensive Plan Update states that, economically, Clarkstown is “business friendly in every sense of the term.” I take offense to this for several reasons. Clearly, the Town is less friendly to the residents in “every sense of the word,” because tax paying residents are prioritized below businesses, as evidenced by the overdevelopment of our community. The local wildlife and open spaces are prioritized lower still, as evidenced by the destruction of green and open spaces in favor of business and housing development. I would like to see the value of open spaces prioritized. It will be the only thing that saves us from continuing and worsening climate change.

The Comprehensive Plan Update is quite detailed, and I appreciate being made aware of the multifaceted approaches to the future of Clarkstown. Green space needs to be our top priority, especially if we wish to preserve this beautiful county for our children and grandchildren. The Haudenosaunee people remind us to think ahead Seven Generations. We must consider the force of our human impact if we want to avoid a future full of 90-degree days.

We have lost much of our beautiful county to overdevelopment, seen a loss of wildlife and bird populations, brought more traffic and pollution to our area. We are promised jobs and lower taxes, in lieu of green spaces, but this is type of mentality not sustainable. We are at a critical juncture and face serious consequences if we do not change our priorities to focus on the environment. You have the Comprehensive Plan Update and are poised to recreate Clarkstown

in a new image. Put the needs of the environment above short-sighted profit margins and become a shining example of sustainability, not only for our lifetime but for the lifetimes of generations yet to come.

My family and I live in Congers, which is earmarked as an industrial/office space location. The Town has succeeded in making this area more commercialized since we moved here in 2002, and sadly we have experienced a loss in our quality of life. Lots of green spaces have been permanently altered and/or removed to make way for industrial parks. I cannot drive down Route 303 without encountering a great many 18-wheelers, construction vehicles, and *lots* of traffic. Air, noise, and light pollution has greatly increased. Although there is mention about quality of life in the Comprehensive Plan, I have great concerns since “in every sense of the word” you are prioritizing businesses over the residents, and the residents over the green spaces.

Response 12.1: The goals “Preserve the suburban and remaining semi-rural character of the Town,” and “Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town’s existing infrastructure and will not conflict with existing residential uses,” support the preservation of Clarkstown’s neighborhoods, while providing for commercial development opportunities in areas best suited for such uses. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, outlines several ways the Town is committed to mitigating the potential impacts of commercial development. In addition, in order to purchase lands for open space and support new environmental initiatives the Town relies upon its business sector to provide the necessary tax base.

Comment 12.2 – (Barbara Pfingst, May 31, 2021): The removal/reduction of so many green spaces in our area concerns me greatly. In our Town Code it says when a swath of land is cleared, there should be no fewer than 17 trees per acre, however a fully grown acre of forest may contain 5,500 trees! (See: https://www.fs.fed.us/ne/newtown_square/publications/resource_bulletins/pdfs/scanned/OCR/ne_rb124.pdf). Our Town Code and Master Plan leave tremendous room for deforestation and barely any for restoration efforts.

We need to update our Town Code to include a greater number of trees replanted when land is cleared; seventeen trees is an incredibly low number. There is nothing in the Code about the quality of the trees after two years, which means the trees may die without legislative oversight, leaving less vegetation overall. Additionally, the Town Code must include protection for low-lying vegetation, as it is often overlooked.

For example, several years ago when a large section of forest was removed overnight across the street from the Palisades Mall, residents like me were shocked. As I understand it, the company, Tilcon, was fined and they replanted a few trees, but the forest never grew back to its original condition. I miss the beauty that once stood there. They were not tasked in reforesting the area back to its original condition. This situation and numerous others leave us with fewer and fewer natural resources to enjoy in Rockland County. There are countless other examples of this happening all over Rockland County, such as West Hook Mountain in Valley Cottage (<https://www.rocklandtimes.com/2021/04/08/advocates-stumped-town-opens-criminal->

investigation/); and Congers (<https://dailyvoice.com/new-york/clarkstown/schools/tree-removal-at-school-upsets-congers-residents/594769/>) to name but a few.

The webpage of the Clarkstown Zoning Board Projects reveals a dizzying array of new buildings and rezoning projects. It is evident that Clarkstown is focused on increasing business but does not place the same focus on sustainable environmental solutions. For greed, we are overdeveloping the land for parking lots, businesses, and homes, leaving nothing for nature.

Once the trees and low-lying vegetation are gone, there is nothing helping them to grow back to their original condition without appropriate legislative measures. You can make a difference by updating the Town Code to reflect a higher priority for our vanishing green resources and create contiguous spaces for wildlife to roam throughout Clarkstown. You can make a difference in the Comprehensive Plan Update by prioritizing green and open spaces over businesses and housing.

In addition to prioritizing the remaining green spaces, mitigate the damage already done by planting more trees and shrubbery in parking lots, in and around buildings, and highways. While solar panel canopies over parking lots is a great idea, do not allow that to be where we stop. Continue to reestablish a new forest of trees and greenery in reimagined spaces. Require new construction to include plans with green spaces incorporated in and around the building and utilize green building codes already in existence. This would increase the desirability of those locations and lessen our environmental impact.

In Congers, two area restaurants, Restaurant X and Kennelly's have both been sold to developers. This will bring more traffic, noise, and pollution to our already crowded hamlet. At the former Restaurant X site, the Town has already preliminarily approved plans to build multifamily homes on the 5.3 acres of land. The Clarkstown Planning Board has also given the green light to build senior housing on the 1.3-acre site. Whatever surrounding greenery will be demolished with the buildings, yet you can make a difference. Require builders to create sustainable housing that includes plants and trees in and around its structure(s); mitigate waste and environmental damage by requiring the developers to incorporate green building designs; and replant more than just seventeen trees after the property is rebuilt. These elements will reduce some environmental damage as opposed to constructing traditional buildings with vegetatively sparse lots. (See: <https://newschoolarch.edu/blog/10-benefits-of-green-building/>).

Response 12.2: The Environmental Resources goal, "Continue to enact limits on total development coverage for all zoning districts," promotes the preservation of natural areas on developable land. Additionally, the town's Tree Preservation Law, which has been updated several times, encourages tree preservation and requires replanting. As part of the implementation of the updated Plan, additional amendments to the Tree Preservation Law may be considered. The Sustainability and Resiliency goal, "Develop programs to reduce greenhouse gas emissions," includes the sub-heading "Built Environment," which calls for the adoption of policies promoting environmentally sustainable building design.

Comment 12.3 – (Barbara Pfingst, May 31, 2021): I did not see in the Comprehensive Plan Update the hotter zones of our area. For example, cities radiate more heat than urban and farm areas. What about Clarkstown and Rockland County, as a whole? I suspect that we have many hotspots around shopping centers and in towns that need to be addressed in the Plan Update by

reestablishing a greater green presence to avoid hotspots and the negative consequences they bring to our animal populations and environment.

Response 12.3: The Environmental Resources goals, “Continue to enact limits on total development coverage for all zoning districts,” and “Protect wooded and natural areas from the removal of vegetation or other native materials which add to the character of the area,” both work to decrease the amount of impervious surfaces and unshaded areas, which contribute to the heat-island effect.

Comment 12.4 – (Barbara Pfingst, May 31, 2021): There may have been a traffic study conducted on Route 303, however nothing to date has changed and the traffic situation has deteriorated since. Will Route 303 be widened? If so, will more trees and plants have to go? If Route 303 is widened, it will mitigate the traffic, but not the pollution. How will you hold business owners accountable for the pollution they create? Will you require trucks to be hybrid or electric, as well? Our Plan must be more environmentally sustainable going forward and not shortsightedly accommodate developers and businesses.

Response 12.4: The upcoming studies of Routes 303 and 304 will be extensions of, and modeled from, the Orangetown Sustainable Development Study of Route 303 which was also funded by NYMTC. Specific improvements and environmental mitigation will be considered upon review of the studies’ recommendations. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, states that energy efficient designs will be used to mitigate building air emissions. While the Town cannot require the use of electric or hybrid vehicles, the Plan does encourage the installation of EV charging stations.

Comment 12.5 – (Barbara Pfingst, May 31, 2021): There are many empty buildings in Rockland County, yet we continue to build and overbuild. The Comprehensive Plan addressed empty buildings but lacked details. We have many empty stores in both the Palisades and Nanuet Mall, not to mention the nearby industrial parks. The Plan states these will be reconsidered for rezoning, however there is nothing about readapting the land and buildings to include more green spaces. Please make Clarkstown more friendly to native plants and animal species by reusing existing buildings and retrofitting them to be more environmentally sustainable, whatever their use. (Please see: <https://biofriendlyplanet.com/green-ideas/eco-friendly/design/why-green-building-may-be-a-key-to-affordable-housing/>).

Response 12.5: The Economic Development goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the redevelopment of underutilized buildings. The Sustainability and Resiliency goal, “Develop programs to reduce greenhouse gas emissions,” includes the sub-heading “Built Environment,” which calls for the adoption of policies promoting environmentally sustainable building design.

Comment 12.6 – (Barbara Pfingst, May 31, 2021): The Comprehensive Plan did not state where the Sport and Recreation Facility would be built, nor the building size. My suggestion is to use part of the land/buildings where the Palisades or Nanuet Mall resides, since there are empty buildings on the property. There are other options, as many empty stores on Route 59 are already situated close to highways and public transportation and parking structures already exist.

Building the Recreation Facility on already developed land would help preserve other green spaces in Rockland. The Master Plan must require this future building to incorporate green spaces and ecological building materials in its plan.

Response 12.6: In addition to placement at an existing Town facility, the Town will consider the placement of this facility in an underutilized developed area to the extent feasible. The Plan has been expanded to include this information. However, the Town is not currently in the process of site selection, nor have specific building details been considered.

Comment 12.7 – (Barbara Pfingst, May 31, 2021): Because of the greater number of homes and senior housing being built, we need more parks for people to enjoy. For example, Congers Lake is becoming more and more crowded as additional people move into the area. The Plan suggests that there will be more bicycling and walking paths, but it seems they will be built along highways. Will Clarkstown increase the number tree and green-lined walking paths to accommodate the greater number of residents in search of a forested area to walk?

Response 12.7: The Plan includes the goals, “Continue the acquisition of open space lands to protect sensitive environmental areas, as well as farmland; Provide intra- and inter-Town trails and Develop walking trails at Davenport Preserve,” all of which promote the expansion of trails within natural settings in the Town. Additionally, trails through natural areas have recently been added at Germond’s Park and expanded at Hook Mountain. Furthermore, the Town requires developers of residential subdivisions and multi-family housing projects, including senior housing, to set aside land for recreational use for all Town residents. If this land is not provided, money in lieu of land is collected for municipal recreational funding.

Comment 12.8 – (Barbara Pfingst, May 31, 2021): Where will the new Pickleball Courts be built? The Comprehensive Plan did not state the location, nor what kind of building would be required. Regardless, the courts can be placed inside one of the many the empty buildings that sit idle throughout Clarkstown or on adjacent developed property, as opposed to breaking new ground.

Response 12.8: Additional Pickle Ball courts will be constructed at Gilchrest Park in Congers. No other sites have currently been chosen for further additional pickle ball courts. As stated in the Plan, the majority of the Town’s existing pickle ball courts are located within or upon existing town tennis courts and facilities.

Comment 12.9 – (Barbara Pfingst, May 31, 2021): Lastly, the issue of recycling needs to be addressed. Recycling is not a sustainable option for the environment. (See: <https://www.npr.org/2020/09/11/897692090/how-big-oil-misled-the-public-into-believing-plastic-would-be-recycled>). Clarkstown therefore, must take responsible action in reducing our overall waste. Our Comprehensive Plan must include alternatives to recycling, such as reduction and elimination of non-biodegradable waste. For example, the elimination of plastic bags was a good start but does not go far enough. We must encourage our residents and business owners to move toward sustainable options. As a resident, I would welcome greater choices for purchasing and disposing products that are biodegradable. Businesses, likewise, need to create alternatives for single-use and non-recyclable items.

Response 12.9: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 13.1 – (Al Samuels, June 1, 2021): I am very happy to see that you are continuing your economic development department.

Response 13.1: The Economic Development goal, “Continue the Office of Intergovernmental Relations/Economic Development to attract new businesses and assist business already established within the community,” calls for the continued operation of the Town’s Office of Intergovernmental Relations, which serves to promote and assist economic development within the Town.

Comment 13.1 – (Al Samuels, June 1, 2021): We're very pleased to see that you're looking to provide for mixed use development in areas of Clarkstown. One of the things that came across in the Regional Council is that mixed use developments are a way forward. We think that it provides great opportunity at both [the] Palisades Center and Shops at Nanuet, as well as other properties...

Response 13.2: Implementation of the Economic Development goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” will entail an analysis of the Town RS and MRS zoning districts, which include the Palisades Center and Shops at Nanuet.

Comment 13.3 – (Al Samuels, June 1, 2021): ...probably the most difficult infrastructure issue that we have in Rockland is water. And development anywhere has to be considered in terms of where we get our water and to protect against running out of enough water to provide. I think the issue of water is very critical.

Response 13.3: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, outlines several ways the Town is committed to mitigating the potential impacts upon water quantity and quality.

Comment 13.4 – (Al Samuels, June 1, 2021): And then the other that I might mention is that we have seen that programs or processes where people can exchange properties. You have to make sure that they're rock solid in terms of preventing against unintended consequences of any developer, groups of developers, individual or other organizations can prostitute the process to create density.

Response 13.4: The referenced goal, calls for the Town to “consider” a transfer of development rights program. At this time, the program is only a suggestion and no details have been developed.

Comment 14.1 – (John Erico, June 1, 2021): ...my property bump[s] up against [Route] 59 on Foxwood Road in West Nyack. And my property is the first backyard that does not have a sound barrier... many of my residents and I are very tired of being woken up in the middle of the night because of truck noises that are so close, and can be minimized by extending the sound barrier.

Response 14.1: The Environmental Resources goals, “Continue investigation of and action against complaints of noise, dust, odor and light pollution,” and “Continue to assess the potential for noise, dust, odors and light pollution in projects under review; require the elimination or mitigation of these pollutants as a condition of approval” promote efforts to reduce noise pollution within the Town. Additionally, the Health, Safety and Welfare section goal, “Develop zoning and building regulations, and implement roadway changes that reduce or restrict odors, sounds, light pollution, commercial traffic and other negative environmental impacts on residential areas,” was expanded to include roadway changes to better manage the impacts of commercial traffic.

Comment 15.1 – (Emily King, June 1, 2021): Basically reaffirming Mr. Samuels in terms of water being probably the – going forward for all of Rockland County, all of Clarkstown for the next 20 years, that's going to be a pivotal issue. Not just how much, will we have enough, but the quality of water, what's in it and how it gets there.

Response 15.1: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources.

Comment 15.2 – (Emily King, June 1, 2021): We need to establish a reputation for a place where you cannot break the code. People go ahead and do it because they think they can get away with it. And we need to change that. Not pay for it afterwards like a naughty child who didn't ask Mom.

Response 15.2: The continued provision of code enforcement is covered under the Health, Safety and Welfare goal, “Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced.”

Comment 15.3 – (Emily King, June 1, 2021): In terms of open land use, I grew up right next to Davenport Preserve. Davenport Preserve is a nature preserve, not a park. The premises shall forever be held to the original agreement. The premises shall forever be held as a nature preserve for scientific, educational and esthetic purposes, including public recreational activities, which are compatible with a primary intent, and shall be kept entirely in its natural state for the benefit of the people of the United States, the state of New York, including all surrounding property owners. And it allows for trails. I think it would be really good if not just as a hearing, but if we would create, for example...friends of Davenport Preserve. There's five or six families, that we would like to be included in the process of where those trails are going to go. We don't

want them to be mountain bike trails. We don't want them to be ATV trails. You know, if people want to go and look and see where the birds are, and the deer, and the coyotes, and the foxes, great. But the land is there for the animals... And we'd like the formation of a committee to include the people around it who really know about that area... a neighborhood committee that is involved in the development of, of what should be public access.

Response 15.3: A reference to community participation in determining the future plans for the preserve has been added to the text following the goal, “Develop walking trails at Davenport Preserve.”

Comment 15.4 – (Emily King, June 1, 2021): There are a lot of scary invasive plants. It would be nice to be able to go through with people who know what the native plants are, and what the invasive species are. And say that patch, that scary thing called devil's walking stick, that's got to go.

Response 15.4: The Environmental Resources goal, “Manage and remove invasive flora species, both terrestrial and aquatic,” promotes the removal of invasive plants.

Comment 15.5 – (Emily King, June 1, 2021): In terms of water... in Ramapo's Comprehensive Plan. They...decided to divide Ramapo into wards. And the ward they started with was the one that is continuous with New City. Which has a lot of open land. And they would like to develop it in a large scale...that watershed is our watershed. That's where our water starts...You can't just decide that's Ramapo and has nothing to do with us. So we'd also like to see some sort of coordination, maybe through Rockland County. It's really important that we collaborate and influence Ramapo.

Response 15.5: The Implementation chapter of the Comprehensive Plan calls for the continuing use of Inter-Municipal Agreements (IMAs) as a method of achieving the goals and objectives of the Plan.

Comment 16.1 – (Zeeba Rasheed, June 1, 2021): TDR, transfer development rights. We would like to know a little bit more about them, and how do you intend to create the different transfers. Usually in New York City, it's the air rights. That's what we call TDRs. But here it's, I guess it's created for, because of the low density. But I'm interested to know more about it.

Response 16.1: The referenced goal, calls for the Town to “consider” a transfer of development rights program. At this time, the program is only a suggestion and no details have been developed.

Comment 17.1 – (Jacqui Drechsler, June 1, 2021): On Page 90 of your plan, and it might be on...transportation. It's all about air quality and cutting down on vehicular traffic so that there's not as much air pollution, not as much light pollution, not as much runoff coming from roads, roadways and parking lots. And yet, the potential for all of the development and all of the housing units, call it what you will, senior assisted, over 55, most of those people will be having cars. So you're talking, say, I don't even know the actual number of all the units that you're thinking of putting into this town. Is it 800, is it 1600?...About ten different projects... And I

don't see how that contributes to lowering the air pollution that's specifically from vehicles that you say that you address in this plan...And the DEC is changing their air quality emissions and standards. But I don't see how we're really doing enough on that here in this county.

Response 17.1: The Active Adult Residential floating zone is capped at 700 units and the Senior Housing Special Permit is capped at 800 units. Environmental review under the provisions of the State Environmental Quality Review Act (SEQRA) was conducted for the enactment of both the floating zone and special permit. Additionally, the Environmental Resources goals, “Lobby for air quality monitoring in the Town and County,” and “Continue to coordinate with the New York State Department of Environmental Conservation regarding air emissions within the Town,” both promote efforts to mitigate air pollution. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, states that energy efficient designs will be used to mitigate building air emissions.

Comment 17.2 – (Jacqui Drechsler, June 1, 2021): I'm concerned about this traffic study, that you got a grant for \$850,000 to study traffic on 303 and 304. And I hope to God it's not to allow more trucks, to widen the roads to allow more trucks...we really need to make sure that we have less trucks on our roads.

Response 17.2: The New York Metropolitan Transportation Council (NYMTC) is funding these roadway studies. The upcoming studies of Routes 303 and 304 will be extensions of, and modeled from, the Orangetown Sustainable Development Study of Route 303 which was also funded by NYMTC.

Comment 17.3 – (Jacqui Drechsler, June 1, 2021): I read an article by Rick Tannenbaum... And it was on the possibility of warehouses coming to a town near you. And warehouses are known for huge, huge amounts of emissions. And your comprehensive plan does not take this possibility into account... this is a very serious issue because this kind of pollution gets deep into the lungs.

Response 17.3: The environmental impacts of individual developments are considered by the Town's land use boards during the environmental review process. Warehousing is already a permitted use in several of the Town's zoning districts.

Comment 17.4 – (Jacqui Drechsler, June 1, 2021): I'm very concerned about the transportation issues in Rockland... I'm concerned about all of the quote, seniors, end quote, who, you know, these, these communities are not walking communities. They're not, you know, in like big repurposed buildings where there's shopping, and there's dining, and there's living, and there's green space...if they're not driving to the store, then they'll be using Mini-Trans to the store. So you know, it's going to be another hit on the resources of Clarkstown.

Response 17.4: The Transportation goals, “Provide local public transportation services that promote sustainable travel options for Clarkstown residents, businesses, and visitors,” and “Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation,” promote the provision of transit services and the creations of pedestrian and cyclist-friendly development within the Town. The Economic Development goal,

“Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” supports the re-use of existing structures and developed property for new development.

Comment 17.5 – (Jacqui Drechsler, June 1, 2021): ...water...is...one of the most important issues facing our future as a county...we are paying the highest water rates. We have water that we can't drink. And we have a lot of people who are going to be flushing, and showering, and dishwashing... It's a huge amount of resources that we...need to conserve.

Response 17.5: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, outlines several ways the Town is committed to mitigating the potential impacts upon water quantity and quality.

Comment 17.6 – (Jacqui Drechsler, June 1, 2021): ...there needs to be some equity, you know, parity on, on zoning and on who is allowed to do what. And you cut down a hundred trees and so what, big deal. It's a big deal.

Response 17.6: The continued provision of code enforcement is covered under the Health, Safety and Welfare goal, “Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced.” The Environmental Resources goal, “Protect wooded and natural areas from the removal of vegetation or other native materials which add to the character of the area,” supports continued efforts to preserve trees within the Town during development.

Comment 17.7 – (Jacqui Drechsler, June 1, 2021): I would love it if you would somehow be planning for housing for our volunteers. Our county survives because of our volunteers, our EMTs, our firemen, our mental health workers. Mental health workers don't get paid enough to be working here in this county.

Response 17.7: The Housing goal, “Create zoning to encourage income adjusted housing for emergency service volunteers,” and the Health, Safety and Welfare goal “Create a mechanism for providing tax relief to volunteer emergency service personnel,” promote programs to aid in housing for volunteer EMTs and firefighters.

Comment 17.8 – (Jacqui Drechsler, June 1, 2021): I'm a little concerned about the fact that we say that there's sustainable building, but I don't see it. I don't see permeable paving, and I don't see green roofs.

Response 17.8: The Sustainability and Resiliency section goal “Develop programs to reduce greenhouse gas emissions,” includes the sub-section “Built Environment,” which promotes green building initiatives. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, includes permeable paving and green roofs as forms of mitigation.

Comment 18.1 – (Dolores Baldasare, June 1, 2021): I would just want to urge that while I hear economic development and I do understand its value, we are at a point in our, in this climate

catastrophe where even as late as today... I wasn't expecting the temperature to increase, go by 1.5 degrees in even my lifetime, there is a 40 percent chance it's going to happen in the next five or ten years... And that has got to be the focus over economic development, over money. It's a big deal. And it sounds like that is very much being taken into consideration.

Response 18.1: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 19.1 – (Al Osterlitz, June 1, 2021): My comment is basically about recreation...the lack of recreation in Ward Four that I see in the plan coming up... West Clarkstown Road is not in Clarkstown School District proper. It's in East Ramapo School District. The facilities in East Ramapo School District as far as recreation are really... disgusting. There's one park on Pascack which needs to be upgraded to a facility, a modern facility that accommodates everybody...this plan...doesn't show enough for recreation in that area of Clarkstown.

Response 19.1: The Pascack Community center is in this area, which is the newest such facility in the Town. Upgrades will be considered in the future, as necessary. Additionally, Town residents may use any recreational facility within the Town.

Comment 20.1 – (Jocelyn DeCresenzo, June 1, 2021): ...I'd like to know what that \$850,000 is going to go for, and if that is actually being given to the Town of Clarkstown by the New York State DOT. I'd like to know where the funding is coming from for that and for what purpose.

Response 20.1: The New York Metropolitan Transportation Council (NYMTC) is funding roadway studies of Routes 303 and 304. These studies will be extensions of, and modeled from, the Orangetown Sustainable Development Study of Route 303 which was also funded by NYMTC.

Comment 20.2 – (Jocelyn DeCresenzo, June 1, 2021): ...water...is terribly important. Without clean potable water, we have nothing. Without our aquifers being safe, we have nothing. And so the cleanliness and quality of our water is probably one of the most important issues that we face. And we can't have it be sucked up.

Response 20.2: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, outlines several ways the Town is committed to mitigating the potential impacts upon water quantity and quality.

Comment 20.3 – (Jocelyn DeCresenzo, June 1, 2021): ... housing developments that are enormous, that are, you know, privately owned, basically... don't take into account people who

might need housing like our EMTs and people who help other people in times of need.

Response 20.3: The Housing goal, “Create zoning to encourage income adjusted housing for emergency service volunteers,” and the Health, Safety and Welfare goal, “Create zoning to encourage income adjusted housing for emergency service volunteers,” promote programs to aid in housing for volunteer EMTs and firefighters.

Comment 20.4– (Jocelyn DeCresenzo, June 1, 2021): ...our trees are what sequester carbon and help us with all the atmospheric pollution from our vehicles that is only getting worse and worse. Rockland County has the highest asthmatic rate, I think... we have a very bad problem in Rockland County with our air quality.

Response 20.4: The Environmental Resources goal, “Protect wooded and natural areas from the removal of vegetation or other native materials which add to the character of the area,” works to preserve existing trees within the Town. The Environmental Resources goals, “Lobby for air quality monitoring in the Town and County,” and “Continue to coordinate with the New York State Department of Environmental Conservation regarding air emissions within the Town,” both promote improved air quality within the Town.

Comment 20.5 – (Jocelyn DeCresenzo, June 1, 2021): [Rockland County is] just going to be one big strip mall with a lot of apartment buildings. And that's [a] really sad thing to think about.

Response 20.5: The goals “Preserve the suburban and remaining semi-rural character of the Town,” and “Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town’s existing infrastructure and will not conflict with existing residential uses,” support the preservation of Clarkstown’s neighborhoods, while providing for commercial development opportunities in areas best suited for such uses.

Comment 21.1 – (Roberto Johnson June 1, 2021): ...with regard to development limits on some areas, I would ask that we could look at...there just being a standard for the whole town... there are some areas that...have more water, have... more forest area. So I would just say that when we look at areas, that we look at those areas with the same understanding that no area is more... valuable than another area, or gets more consideration than another area...the area that I'm concerned about is the character of the community. And I think that what we should also be mindful of is that there's a certain sense that within a town, there's community equity, because it's the people who live in the town who actually make the town a vibrant place.

Response 21.1: The Town’s zoning districts are not unique to particular areas of the Town. Zoning Code standards which apply to these districts are applied identically throughout the Town, no matter where they may be located. The Environmental Resources goal, “Preserve the suburban and remaining semi-rural character of the Town,” is applicable throughout the entire Town, not any one specific area or zoning district.

Comment 21.2 – (Roberto Johnson June 1, 2021): I’m...very interested in the Traffic Study...I think that we need to have the Town really get some movement on taking care of West Clarkstown Road. Because it’s too small...the area is getting dense.

Response 21.2: The Transportation goal, “Implement a Complete Streets Program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes,” promotes Town efforts for transportation safety and efficiency.

Comment 21.3 – (Roberto Johnson June 1, 2021): ...right now in Clarkstown, we have an issue with illegal rentals. And that's one of the main issues in my particular neck of New City. And that gets me to the point of code enforcement...I found that the code enforcement office is very small. And you know, it takes a while for them to get around to your complaint.

Response 21.3: The continued provision of code enforcement is covered under the Health, Safety and Welfare goal, “Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced.”

Comment 21.4 – (Roberto Johnson, June 1, 2021): ...the idea of water testing...I was personally concerned...Suez came out. They took my water and tested it. And they send me the results. And I think...more residents should be aware of that.

Response 21.4: The Sustainability and Resiliency section goal, “Develop programs to educate Clarkstown residents on issues of sustainability and resiliency,” promotes educating residents about environmental issues, such as water quality.

Comment 22.1 – (Rockland County Sewer District NO. 1, June 1, 2021): Our office has received and reviewed the 2021 Comprehensive Plan Update DGEIS from your department. We thank you for the opportunity to comment on the DGEIS. Our comments are as follows:

1. The DGEIS states that implementation of the Comprehensive Plan will involve zoning text amendments and land use changes. The DGEIS acknowledges that the achievement of specific goals and objectives will result in decreased sewerage capacity, which would be mitigated by coordination with the District. Sections 502A and 1317 of the Rockland County Sewer Use Law as last amended in 2010 provide a mechanism by which reduced sewerage capacity resulting from zoning amendments and land use changes can be mitigated:
 - a. For zoning amendments and land use changes that would result in sewer units above that in which development by right under the original zoning regulations would result, an impact fee will be required in accordance with Sections 502A and 1317 of the Rockland County Sewer Use Law as last amended in 2010.
 - b. If a land use approval [i.e., by the Town Board, Planning Board, or Zoning Board of Appeals (ZBA)] or a building permit will result in additional sewer units because of zoning amendments and land use changes, the applicant will have to submit a check payable to Rockland County Sewer District No. 1 for the impact fee, which is currently one thousand eight hundred fifty dollars (\$1,850.00) per additional unit, within thirty (30) days of approval.

- c. If the use or occupancy of a property exceeds the number of units for which a project sponsor applied, or in which development by right under the original zoning regulations would result, the owner will have to pay an impact fee.
 - d. We request that payment of impact fees be made to the District before structures are connected to the sewerage system.
 - e. We request that the Town Board, Planning Board, ZBA or Building Department notify the District upon approval of applications that require payment of impact fees.
2. For the record, the United States Environmental Protection Agency (EPA) has designated certain lots in the Town of Clarkstown as Environmentally Sensitive Areas (ESAs). If a lot that is an ESA, was subdivided from an ESA lot, or merged with an ESA lot applies to connect to public sewers, the following requirements shall apply:
- a. Prior to connecting any building to sanitary sewers, the developer must obtain a waiver of the EPA's grant condition, which restricts sewer connections from ESA lots. Any sewer application for these parcels cannot be approved until the EPA and New York State Department of Environmental Conservation (DEC) approve the waiver.
 - b. An ESA waiver request must be submitted to this office along with the correct number of plans and narratives as indicated below. The District cannot forward an ESA waiver request to the EPA and DEC until four (4) copies of the information outlined below are submitted to this office:
 - i. **PROJECT PLANS:** Please provide a detailed site plan of the existing and proposed topography, drainage, soils, etc., and other features of the site.
 - ii. **ESA BOUNDARY DELINEATION:** Please provide a precise delineation of the ESA boundary on the same scale as the aforementioned site plan. Also, provide a brief written report that delineates the boundaries of both the wetland and the 100- year flood plain boundaries.
 - iii. **EROSION AND SEDIMENTATION CONTROL (E&SC) PLANS:** Please provide a complete erosion and sediment control plan for the entire site to protect the ESA wetland and floodplain both during and after construction (include standard notes and details).
 - iv. **ESA CHARACTERIZATION AND EVALUATION:** Please describe the current wetland features of the ESA wetland areas on the site in terms of the following parameters: acreage, flora, fauna, wildlife habitat, soils, rock, flood control, and the surrounding setting. Please also evaluate the wetland values in accordance with the latest available U.S. Army Corps of Engineers Wetland Evaluation Manual. Also, please quantify the floodplain characteristics and evaluate the effects of your project on it.
 - v. **EFFECTS OF MODIFICATIONS:** Please explain how the proposed site disturbances would affect the site features and values discussed in response to

Item 4 above.

- vi. **ESA MITIGATION:** Please provide a detailed narrative discussion of your proposed mitigation plan in order to comply with the standards for waiver approval listed below. As necessary, the plan should include the creation of new wetland acreage of, at a minimum, equal size and value to that which would be lost.
- vii. **STANDARDS FOR WAIVER APPROVAL:** The standards applied by the EPA and DEC for ESA Waiver Approval are similar to the DEC standards for a Freshwater Wetland Permit. There will be a sufficient demonstration of:
 - (1) no net loss of wetland acreage or wetland values;
 - (2) no reasonable non-wetland alternate locations existing on the site for this development;
 - (3) minimization of loss of wetland and wetland values;
 - (4) mitigation of any loss of wetland acreage or wetland values;
 - (5) no appreciable increase in turbidity or sedimentation in the wetland or any watercourses above background levels; and
 - (6) no net increase in downstream flooding during storm events.
- c. The Procedural Rules for Working on Rockland County Sewer District No. 1 Sewers impose a fee of three hundred fifty dollars (\$350.00) to process an application for an ESA waiver.
- d. Once the above requirements have been met, our office will forward the required information to the EPA and DEC. It should be noted that three (3) of the four (4) sets as requested above are required for EPA and DEC purposes.
- 3. The DGEIS states that the Comprehensive Plan Update recommends zoning amendments to the non-residential RS and MRS Districts, and to promote a mix of residential, business and retail uses in the Town's hamlet centers. For non-residential projects or the non-residential use of a property, Rockland County Sewer District No. 1's "Commercial/Non-residential Wastewater Questionnaire" and the County Planning Information Certification (attached) must be submitted to and approved by this office before any sewage is discharged into the District's sewerage system. The owner must sign the wastewater questionnaire.
- 4. We request that the Town notify the District upon adoption of the 2021 Comprehensive Plan Update and provide us with a hardcopy of the zoning map and Town Code when they are updated.

Response 22.1: The Town will comply with all of the requirements of Rockland Sewer District No. 1 upon implementing any zoning amendments or land use changes associated with the updated Comprehensive Plan.

Comment 23.1 – (Sabrina Tenteromano, June 2, 2021): Will the Town consider offering discounts in the bidding process to companies/builders/developers that propose sustainable building solutions and circular components for development projects? For instance, designing in organic gardens at the senior housing project at Shimpf's or net zero building design at the three story strip mall going up on Main St?

Response 23.1: The development of private property, such as Schimpf's or the strip mall, does not involve a bidding process on the part of the Town. The Town puts out bid requests for its own public projects. The Town can incentivize private development to be more sustainable by providing more density, for example, or can simply require a higher standard for development, such as requiring an additional 10% reduction in stormwater for all new development.

Comment 23.2 – (Sabrina Tenteromano, June 2, 2021): Does the plan add a goal to pass legislation that limits the use of gasoline leaf blowers during summer months?

My only follow up is re sidewalks and concrete: there are alternatives to high carbon concrete as I'm sure you know and just across the water, Hastings is the latest to adopt low embodied carbon concrete rules. Cutting away turf grass in favor of low embodied carbon sidewalks with pollinators seems like it would offer greater environmental benefits than impacts. Of course it requires formal analysis like anything else.

Response 23.2: The goal "Create a Town Committee on sustainability and resiliency," in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town's sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee's task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 23.3 – (Sabrina Tenteromano, June 2, 2021): When might we see the effects of Complete Streets? You mention problems, like environmental impacts, arising in the process of solving other problems or goals of the Plan. What about single solutions solving multiple problems? This saves money and time and often generates more resilient, sustainable solutions. For instance, Complete Streets represents the opportunity to solve speeding, recreation, safety and pollution and biodiversity issues with the addition of sidewalks that contain pollinators planted on the road side.

Response 23.3: While Complete Streets has the potential to solve a great deal of problems, it still involves committing resources and some disruption of the natural environment. The Comprehensive Plan recognizes that even a sidewalk can result in an impact and the Town must weigh the benefits versus the costs when it comes to Complete Streets. The Town has an extensive roadway network and must prioritize what should be worked on first to maximize the use of its resources.

Comment 23.4 – (Sabrina Tenteromano, June 2, 2021): What is the legality of zone changes?

Response 23.4: In general zone changes are legal if they are in conformance with the Comprehensive Plan.

Comment 24.1 – (Roxanne Watson, June 2, 2021): I appreciate you considering my original comment on the Comprehensive Plan regarding the state of retail and giving retail venues the opportunity to full evolve. I believe this is the right direction for the future of Clarkstown and I look forward to following the progress.

Response 24.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 25.1 – (Laura Bidon, June 14, 2021): It would be helpful for the public to know who served on the Special Board for the Comp Plan, as well as who served on the various subcommittees, to ensure a fair representation of community interests.

Response 25.1: The list of the members of the Special Board responsible for the Updated Comprehensive Plan is now included at the beginning of the Plan; no subcommittees were created for the Plan update.

Comment 25.2 – (Laura Bidon, June 14, 2021): Currently there are a number of non-residential uses that are “permitted by right” in our residential districts, even though the proposed use may not be in alignment with needs identified in the Comp Plan (e.g., the Plan doesn’t anticipate a need for new schools, yet schools are “permitted by right” in residential zones). Developing special use/permit conditions for non-residential uses in residential zones would give the Town more discretion in the review and approval process, and help to align non-residential development more closely with identified community needs.

Response 25.2: All school districts within the Town were sent copies of the Draft Comprehensive Plan Update and developments with the potential to impact schools are also referred to their respective school district for review. The Town is continuously reviewing and amending its Zoning Code to ensure uses are compatible with their zoning districts. Special permits are required for a number of uses within the Town, and new conditions and regulations for specific uses will be enacted as necessary.

Comment 25.3 – (Laura Bidon, June 14, 2021): I appreciate the intent of the current code which limits non-residential uses in residential zones to State and County Roads. However, it has had the negative effect of over-burdening our county roads—many of which are secondary/connector roads (e.g., West Clarkstown Road). What will be the Town-wide implications if these connector roads become further clogged with density and traffic?

Response 25.3: Uses are designated for location on State and County roadways because these roadways have capacity greater than the Town’s local roads. Uses should be provided where they are best accommodated by existing infrastructure. Traffic implications are considered by the Town’s land use boards during reviewing of specific project on a case by case basis during the environmental review process as mandated by the State Environmental Quality Review Act (SEQRA).

Comment 25.4 – (Laura Bidon, June 14, 2021): In some cases, prospective developers are purchasing adjacent residential properties and bundling them into one property for non-residential development purposes. This leads directly to over-scaled development, as the resulting lot is at least twice the size of surrounding lots and is developed as such; this practice of merging adjoining lots for non-residential development should be disallowed in residentially-zoned areas.

Response 25.4: Such regulations will be considered when revising the Zoning Code during the Implementation of the Comprehensive Plan.

Comment 25.5 – (Laura Bidon, June 14, 2021): What is the Town’s definition of “inappropriately scaled” development? Is a project considered to be appropriately scaled just because it meets code specifications? Many recently proposed developments seem to be out of scale to the surrounding neighborhood, even though they meet all code and bulk use requirements. “One size fits all” specifications do not adequately account for the context of the surrounding neighborhood. Appropriate scale should be defined for each project in the context of the specific neighborhood where it will be located. A building height of 35’, for example, might be within scale in one community, but not in another, based on the surrounding area. Guidelines that require proportionality to surrounding areas, rather than “one size fits all” specifications for height, density, building and lot coverage would offer better protection against inappropriately scaled development.

Response 25.5: Implications of specific developments are considered by the Town’s land use boards on a case by case basis during the review and approval process, and during the environmental review process as mandated by the State Environmental Quality Review Act (SEQRA).

Comment 25.6 – (Laura Bidon, June 14, 2021): There are several areas in our Town that appear ripe for development: 1) the West Clarkstown Road corridor; 2) North Main Street in New City; and 3) the Town-owned property at the former Rockland Country Day School in Congers. Will development in these areas occur in a piecemeal fashion, guided primarily by private interests, or can we envision cohesive plans for our neighborhoods--plans developed in partnership with residents and developers who are willing to engage in a collaborative and inclusive planning process? By the time projects reach the public hearing phase of the planning process, they appear to be “done deals.” I encourage the Town to foster public/private collaborations that seek a more broad-based input to the planning process. This will help the Town achieve a more cohesive community design, one that is geographically balanced and meets the diverse needs and desires of its residents.

Response 25.6: Projects are reviewed by the Technical Advisory Committee (TAC) for technical compliance prior to appearance before the Planning Board. These projects are not “done deals.” As mandated by law, projects appearing before the Planning Board involve public hearing during which citizens are given the opportunity to comment and developers are made to collaborate with the Town and the public in order to receive approval for their projects. The Planning Board is independent of TAC, and has the final vote on projects under its purview.

Comment 26.1 – (Gillermo Rosa, Deputy County Executive of Rockland County, June 18, 2021): On behalf of the County of Rockland, I am pleased to submit this letter of support for the Town of Clarkstown’s Comprehensive Plan. As the county seat and the second largest town in the county, the Town of Clarkstown is the most prominent business center in Rockland, and as such, the proposed updates to its Comprehensive Plan capitalize on this potential and responsibly consider expected future growth.

The first goal listed is economic development which demonstrates the overarching need to foster a healthy economy towards the maintenance and enhancement of the excellent quality of life in the town and county. The plan’s objectives align with the county’s economic development mission which is to serve as a catalyst for economic diversity, growth, and prosperity for the county through innovative planning and policy interventions.

The proposed goals of the Comprehensive Plan reflect the evolving nature of land use, transportation and business which help the town achieve its tremendous potential for sustainable economic development. Reimagining commercial districts, corridors and town and hamlet centers will make them more attractive to business, permit greater flexibility to be able to accommodate new and appropriate contextual uses and encourage employment opportunities and quality housing options. Implementing such progressive measures will result in an outcome that will deliver a broad range of equitable social and environmental benefits at both the municipal and county level.

The Town of Clarkstown has a well-documented history of planning for the future and has done an extremely thorough job creating and presenting this plan while allowing for ample public comment. I have no doubt that the Comprehensive Plan will help the Town remain vibrant in a rapidly changing landscape.

Response 26.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 27.1 – (Katherine Schwarz, June 18, 2021): From 2010-2018, the population of Clarkstown grew 2% and all indications are that it is continuing to grow. Population density is now 2461 people/square mile. (This is greater than, for instance, the city of Binghamton, NY). We know that in the county overall (some statistics are not gathered for Clarkstown alone) there are 217,439 licensed drivers and 202,196 registered vehicles, which would come to about 1 car for every licensed driver. From the Appendix of the 2021 Comprehensive Plan, a survey from 2006 showed that an overwhelming majority of people in Clarkstown own their own homes, over 50% of those homes have 4 bedrooms and most households have at least 1 car. If a more detailed survey had been done then or a new study were done today it would probably show that many of those people in their 4-bedroom homes have 1, 2, or maybe even 3 cars per household. We also know that data probably wasn’t yet available for Cambridge Systematics to consider the source of greenhouse gas emissions in the county, but this data was compiled by ICF International for NYSERDA in 2012 and the estimate was that 44.2% of Clarkstown’s CO² emissions are coming from the transportation sector, probably a large percentage of that was

coming from cars. (It was 52.6% for Rockland County as a whole.) This makes it more critical now, over 12 years after 2009, to have included some efforts to discourage people from driving and encourage people to walk, bike, and take public transportation. There is discussion in the new plan about the Complete Streets initiative, which does offer suggestions on how to make Clarkstown safer for those walking and biking, but there is no mention that the streets would be safer if we improved public transit and decreased the number of cars on the roads.

Response 27.1: The Transportation goal, “Implement a Complete Streets Program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes,” and “Provide for commuter transit services that are accessible, efficient and safe,” promote Town efforts for transportation safety and efficiency. A prioritized list of the roadways under consideration for Complete Streets improvements has been added to the Appendix.

Comment 27.2 – (Katherine Schwarz, June 18, 2021): The 2021 plan now uses the term “sustainable travel options” which is vague. Utilizing the term “sustainable” is the politically correct thing to do today, but without any specifics, it can be useless. Assuming it means encouraging cars to be electric, which would be an improvement and would certainly help with the air pollutants, electric cars will still not help with the congestion. The 2021 Comprehensive Plan draws attention to the charging stations that have been installed at the Palisades and the Nanuet malls, but says nothing about switching to electric buses for their Mini-Trans service. And, whenever there are more cars on the road, there is more congestion, slowing down the buses, which further discourages people from taking those buses, providing further justification for reduction in services. It is a vicious cycle.

Response 27.2: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 27.3 – (Katherine Schwarz, June 18, 2021): Regarding the CO² emissions, in June of 2019 New York State passed legislation, the Climate Leadership and Community Protection Act, which among other things, encourages the transition to electric vehicles. It encourages putting our monies into charging stations for electric cars, which makes sense, but only recognizing the need for electric cars and charging stations makes more for rural areas than for suburban areas like Clarkstown (or Rockland). We in densely populated, highly congested suburban areas should put the bulk of monies into building better public transit systems. If existing rebates lure higher income people into buying electric cars, they will be selling their gasoline-operated cars to lower income people who, despite the rebates, still could not afford the electric cars, and we would end up with *more* cars on the road and fewer people on the buses, which would justify cutting bus service even more – again the vicious circle.

Response 27.3: The Town does not have jurisdiction over legislation passed by the State. The Transportation goals, “Implement a Complete Streets Program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes,” and “Provide for commuter transit services that are accessible, efficient and safe,” promote Town efforts for transportation safety and efficiency.

Comment 27.4 – (Katherine Schwarz, June 18, 2021): The 2021 plan does mention the importance of lobbying for improved air quality and for the monitoring air quality. Good data on air quality would have been essential for the planning process itself. For this 2021 Plan, 2010 data was used for the county. This data has undoubtedly changed in the last 10 years. And, there also needs to be lobbying for *several* monitoring stations or, perhaps the moving of the current monitoring station. The current sole air quality monitoring device for the County is in the middle of Conklin Orchards, where it likely doesn’t pick up the pollution coming from where most of the traffic is, for instance in Nanuet or West Nyack, near Route 59 and the Thruway. The American Lung Association rated air quality in Rockland County (not specifically Clarkstown) with a grade of D. And this did not include particulates. The 2021 plan does estimate that “approximately 1/3 of air pollution comes from motorized travel.”

Response 27.4: The Environmental Resource goals, “Lobby for air quality monitoring in the Town and County,” and “Continue to coordinate with the New York State Department of Environmental Conservation regarding air emissions within the Town,” promote the analysis and improvement of air quality conditions within the Town.

Comment 27.5 – (Katherine Schwarz, June 18, 2021): Specifically addressing buses and other larger vehicles, on July 14, 2020, Governor Cuomo announced a Memorandum of Understanding that New York State would be working toward 100% of all new medium- and heavy-duty vehicle sales (buses and trucks) being zero emission vehicles by 2050 with an interim target of 30% by 2030, making money available through the VW settlement to accomplish these goals. Clarkstown could be taking advantage of this offer by upgrading their Mini-trans buses to electric and installing the charging infrastructure. Additional money would still be needed for improved routes, schedules, and signage and for marketing of all of the improvements, including perhaps incentives to encourage people to ride the buses (or disincentives for the driving of cars, which, perhaps, could help fund these improvements.) Without the commitment of the town to these additional improvements to the existing public transit system, it is certain it would fail. And we’d end up with more congestion, greater need for the widening of roadways, more paved over open spaces to make way for parking lots and causing more storm run-off, plus greater inequity, as poorer people would still be stuck on the ever-deteriorating bus system.

Response 27.5: The Transportation goals, “Implement a Complete Streets Program that ensures safe and efficient travel through and within Clarkstown, lowers the number of vehicle crashes that occur in the area and minimizes conflict between travel modes,” and “Provide for commuter transit services that are accessible, efficient and safe,” promote Town efforts for transportation safety and efficiency. Specific suggestions for lowering emissions within the Town will be considered by the future Town committee on sustainability and resilience, the formation of which is another goal of the updated Plan.

Comment 27.6 – (Katherine Schwarz, June 18, 2021): It would make better sense for there to be more discussion with Rockland County about *improving Transport of Rockland service in Clarkstown*, but this didn't appear in the Comprehensive Plan either. Perhaps, instead of Clarkstown Mini-trans service and TOR buses both going electric with separate charging stations and fleets, we could eliminate Mini-trans service altogether and just improve service and begin to build a new fleet of electric TOR buses. Along with that, there could be more offerings of alternatives to owning a car, such as car rental services, better taxi or Uber services, a service to allow for ride sharing or bringing Zip-Car into Clarkstown (or the County).

Overall, especially with transportation issues, closer cooperation with the county is necessary for that suggestion to “seek creative funding for bus infrastructure that is part of *regional* developments.” In other words, it makes sense for the different towns together with the County government to seek monies from the State through the Congestion Mitigation and Air Quality Improvement Program and/or the VW settlement money, for funding the building of infrastructure to convert the bus fleet to all electric and to actually consolidate TOR with Clarkstown's Mini-trans and together work on improving the routes, scheduling, signage *and marketing*. Just now, there is additional money available from NYSERDA for “Advancing Clean Transportation in Disadvantaged Communities.” All the more reason to work with the County Transportation Department to encourage them to apply for such money.

In the long-term, more and more cars on the road is *not* a sustainable transportation plan. And, the current public transit system is virtually a segregated system. Improving public transit and encouraging more people to use it could help to build a more equitable county altogether. Overall, especially with transportation issues, closer cooperation with the county is necessary for that suggestion to “seek creative funding for bus infrastructure that is part of *regional* developments.”

Response 27.6: The Implementation chapter of the Plan promotes working within regional governments and agencies to aid in the achieving the goals of the Plan. The Town has worked with Rockland County in the past on public transportation projects, as evidenced by the Lower Hudson Transit Link project, and will continue in the future on projects such as the upcoming Route 303 and 304 studies. The Transportation goals, “Provide for commuter transit services that are accessible, efficient and safe,” “Develop Hamlet Centers with transportation options and connections,” and “Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation,” all support the use and improvement of transit services within the Town.

Comment 27.7 – (Katherine Schwarz, June 18, 2021): Regarding school buses, there was not a word in the Comprehensive Plan on requiring a gradual conversion of the school bus fleet to electric buses.

Response 27.7: The Town does not have jurisdiction over the school bus fleet selection.

Comment 27.8 – (Katherine Schwarz, June 18, 2021): Almost all new construction mentioned in the 2021 plan would be for commercial or business use, and seems to be along the Route 303 or 304 corridors. And all new housing mentioned in the Plan would be above businesses and for “emergency service workers” with the exception of new housing for seniors. (It is unclear where the senior housing would be.) Throughout the plan there is mention that

nothing should “conflict with residential uses”. So that implies no further development in residential areas. Viewing this with an environmental lens, there *should be* consideration of changing zoning in those residential areas to allow single family homes be converted to dual family homes. More dense living is more environmentally sustainable and would help justify better public transit. And, wherever the senior housing would be located, public transit would be needed, too.

Response 27.8: The Economic Development goal “Preserve the suburban and remaining semi-rural character of the Town,” and the Transportation goal “Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation,” support the preservation of Clarkstown’s single-family neighborhoods where public transportation is not typically available, while providing for mixed-use and higher density residential development opportunities in the areas where public transportation is available.

Comment 27.9 – (Katherine Schwarz, June 18, 2021): The Plan calls for requiring solar panels on all new construction, just on “Town Land.” Why not require it on all new construction and encourage that it be installed on existing buildings and housing? This would ultimately increase the value of those buildings/houses. One or 2 people who live in 4-bedroom houses with their 1, 2 or 3+ cars in the driveway or in their garage have a much higher environmental impact than those living in apartments above businesses and using public transit.

Response 27.9: The Planning Board can currently recommend the installation of solar panels on a case by case basis as environmental mitigation during the Site Plan review process. Specific suggestions for requiring the installation of solar panels within the Town will be considered by the future Town committee on sustainability and resilience, the formation of which is another goal of the updated Plan.

Comment 27.10 – (Katherine Schwarz, June 18, 2021): The plan mentions the solar farm in West Nyack creating enough electricity to serve 1/3 of Clarkstown, but also mentions it serves 200 homes. This must be inaccurate because there are more than 600 homes in Clarkstown.

Response 27.10: The Plan has been edited to clarify that the solar farm creates enough energy to power 200 homes or 1/3 of the energy required for the Town’s municipal facilities.

Comment 27.11 – (Katherine Schwarz, June 18, 2021): Mention is made of putting solar canopies above parking areas. There are environmental benefits of this solution, but there might be bigger benefits if there could be smaller paved parking areas altogether. The Stormwater Commission acknowledged that there is a serious problem with stormwater runoff in Clarkstown and it also came up with suggestions about mitigating this problem. What was not mentioned by the Commission (or at least not in the Plan) was the possibility of fewer paved parking lots, or smaller paved parking lots (with or without solar panels above them) allowing more of that stormwater to be absorbed into the ground. Those smaller parking areas would require better public transit services to and from those areas.

Response 27.11: The Town currently utilizes various mechanisms to reduce the construction of unnecessary parking (i.e. banked parking spaces, shared parking, etc.). The Environmental

Resources goal, “Continue to enact limits on total development coverage for all zoning districts,” works to limit impervious surface coverage within the Town. Additionally, as included in the Sustainability and Resiliency chapter of the Plan, the Town is considering the installation of a solar parking canopy over existing parking areas in Germonds Park.

Comment 27.12 – (Katherine Schwarz, June 18, 2021): The plan includes 1 paragraph about increasing environmental education, which is greatly needed. The plan is rather vague about details. It does not specify for whom, where, on what topics, or how to go about doing this. And the separate Climate Report doesn’t mention environmental education at all. Clearly, the question of who needs environmental education should include students of all ages in all the schools, but also the general public and all town employees, too. It should include the urgency that there is an environmental crisis and that all have to step up to the plate and be involved. It could begin with a new survey of young people (the only survey of young people was in the Appendix and was done in 2008.) High School students could be trained to do the educating of the adults. But also, the plan had no suggestion as to how the town could partner with existing organizations for this – Cornell Cooperative Extension, Sierra Club, Rockland Water Coalition, Rockland Farm Alliance, Keep Rockland Beautiful, etc. who are already doing some environmental education. Nor did they explore what is already going on in New City Library – an environmental education program on Learning to Live More Sustainably called Pare Down/Cheer Up. There is urgent need for environmental education about the need for paring down on the driving, to encourage less traffic, less pollutants, less contribution to GHG emissions, and what about environmental education on paring down on the meat consumption, etc, etc.

Encourage Street Banking: <https://www.streetbank.com/splash?locale=en>

Encourage neighborhoods to share cars, tools, yard equipment, toys, gardens, a compost piles, etc.

Explore inviting an indoor farm (hydroponic or aquaponic) into some of the empty space in the Palisades Mall.

Response 27.12: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 27.13 – (Katherine Schwarz, June 18, 2021): How about some consideration of environmental justice? From the results of the Saratoga Associates study in the plan’s Appendix (2006): The study showed that 13% of the population of Clarkstown were “extremely low income.” Might that statistic have changed since 2006? One would think it would be important to incorporate an update of this information for the current plan and to work environmental justice into all aspects of the plan (including transportation).

Response 27.13: The Economic Development goal, “Work to ensure that a variety of housing options exists within the Town,” and the Housing goal, “Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care,” both

promote the development of housing to support a variety of income levels. Additionally, the Town of Clarkstown Mini-Trans system is the only such municipal public transport system in Rockland County. This system is heavily subsidized and is available to residents of all income levels.

Comment 28.1 – (Jennifer McPhee, June 19, 2021): While I agree with many of the suggestions, I feel that our town code allows for development that is inappropriate and out of scale for our single-family neighborhoods. Our codes need to be reviewed and changed to prevent further destruction of these areas.

The town needs to enforce and follow its own codes. What is the point of having codes when the boards just grant variances or override concerns? Who is going to be held responsible? I cannot get behind some of these new proposals, because I've already seen how they have been manipulated by developers at the expense of the community.

Response 28.1: The continued provision of code enforcement is covered under the Health, Safety and Welfare goal, "Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced," which has been expanded from the 2009 Comprehensive Plan.

Comment 28.2 – (Jennifer McPhee, June 19, 2021): Although it is thought that we need to grow to survive, the amount of growth you are allowing is not sustainable. Our roads are already overcrowded, and our resources (especially water) are already being threatened. I do not see the town taking this into account and looking at the big picture when approving/proposing these new high-density developments and commercial projects.

Response 28.2: Section VII of the Updated Comprehensive Plan details mitigation measures for potential impacts of the Plan, including increased traffic and water demand. The Economic Development goal "Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town's existing infrastructure and will not conflict with existing residential uses," and the Transportation goal, "Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation," support the preservation of Clarkstown's neighborhoods, while providing for commercial and residential development opportunities in areas best suited for such uses.

Comment 28.3 – (Jennifer McPhee, June 19, 2021): It is mentioned in the plan that there is a desire for a fixed performance area in the town of Clarkstown, thus somebody has proposed building an amphitheater at Germonds Park. I have been on all the comprehensive plan calls and have attended countless town meetings and workshops and I have never heard of a single request for this. Pickle Ball yes, Fixed performance space, no. We are trying to keep the towns expenses down, so that we can decrease taxes or at least remain stable, so that young families can afford to buy homes in our town. How does building this help in that regard? It is just another expense that the town will have to 1) Build and 2) Maintain. This is a definite NO in my opinion. You are also proposing to build it right next to two historical homes. I guess there is no preserving Historical Areas in Clarkstown anymore, as proven with the green light on Schimpfs Farm development.

Response 28.3: Requests for an amphitheater were made to the Recreation and Parks Department prior to the public outreach conducted for the Comprehensive Plan Update. The Town is obtaining state funding for the amphitheater at Germonds Park. The proposed amphitheater will be buffered and shielded from view of the adjacent historic properties and constructed from natural materials. This facility will also bring in visitors in who may be interested in visiting the Town historic sites.

Comment 28.4 – (Jennifer McPhee, June 19, 2021): You talk about making our town more walkable and new projects need to factor in sidewalks. Who is going to maintain these sidewalks? Mow or water the grass areas that are sometimes established between the curb and the sidewalk? The new sidewalks on 304 are great, yet half the areas are not being mowed and I see either a town or county truck coming out and watering the grass. Additionally, in the winter these sidewalks need to be plowed. Who is doing that? More expenses added to the town and passed on to the residents. Think about all the money that is now spent when Main Street in New City needs to be plowed after a snowstorm. Due to someone’s brilliant idea that we need cutouts for parking along Main Street, these cutouts now need to be shoveled out by hand because the plows cannot get in there. Whose pockets are we lining? Certainly not the residents of Clarkstown.

Response 28.4: The Town had no control over the construction of the sidewalks on Route 304 by the State DOT. The Town has generated a prioritized list of future sidewalks projects based upon the recommendations of the Clarkstown Comprehensive Transportation Plan and the work of a Town Sidewalk Committee. Prioritizing these projects helps insure that the construction of any additional Town sidewalks will result in improvements where most needed, and avoid the creation of infrastructure which is underutilized. Additionally, the Complete Streets Committee prioritized roadways which would benefit from improved sidewalks and pedestrian infrastructure, a process which also results in a more efficient expenditure of Town funds.

Comment 28.5 – (Jennifer McPhee, June 19, 2021): The town needs to review and adjust the procedures for approving new projects in Clarkstown. From experience, it appears that the Planning Board approves projects and only then hands it off to the AHRB for review and approval. However, some of the aspects that are approved at the Planning Board reviews really need to be reviewed and approved by the AHRB. For example, Schimpf Farm. The Planning Board approved 7 buildings, 3 stories high plus a club house. At the AHRB meeting, they were surprised to see such a project approved based on the density and height of the buildings and even though the code says that the AHRB has a say over the inappropriateness and mass bulking of a development, citizens were told that their “hands were tied” because the Planning Board approved the project. One member of the AHRB seemed to stand with the community, but then a vote was conveniently done while that member was not in attendance. There is a serious problem with how the boards approve projects and interact with each other and if you plan on all this future development to be reviewed and approved in this manner, I fear for Clarkstown.

All land use board members should be required to visit the sites that they are making decisions on. There should be multiple visits that should possibly involve the public as well so we can point out our concerns face to face. How can smart decisions be made based on a paper site plan

and mocked up computer generated designs? The AHRB members seems to follow this practice and I think it should be made mandatory.

These workshop and comprehensive plan committees need “real people” on them, not the developers and politicians who are basically making decisions that best meet their needs, not the publics. I find it funny that Clarkstown is now pushing and allowing a huge amount of senior housing. Strange that one of the largest and inappropriate developments, Schimpf Farm, is being proposed by a developer and architect who sat on the Housing Committee back and recommended that we need senior housing. Once again, lining their own pockets at the community’s expense.

All vacancies for board positions in the town should be published and made public. All committees’ positions should be published and made public. We need fresh ideas and new perspectives.

Response 28.5: The Comprehensive Plan is not intended to address the procedures of the Town’s land use boards, which are established by State Law, nor the composition of these Boards, which are determined by the Town Board. Board members often make site visits, and do so at their own discretion. The Housing Committee was established to implement the Comprehensive Plan goals calling for additional senior housing within the Town; these goals were created as a result of the comments and recommendations collected during the public outreach process for the 2009 Comprehensive Plan. Zoning for senior housing was crafted independently of the Housing Committee and passed by the Town Board. Applications are reviewed by the land use boards based upon their merits and not by the applicant proposing the development.

Comment 28.6 – (Jennifer McPhee, June 19, 2021): All the boards need to take a BIG Picture view of the projects they approve. On its own a residential complex on North Main Street with 50 units may be fine, however, then they approve another 5 projects just like that on the same road. Another example is West Clarkstown Road. It is a 2 lane “country road” but with all the planned and in some cases approved projects, this road needs to be the new Rt. 59.

Response 28.6: Cumulative impacts of multiple developments are considered by the Town’s land use boards during review.

Comment 28.7 – (Jennifer McPhee, June 19, 2021): This comment is straight from the comprehensive plan draft. Yet the Supervisor and all the land use boards have given the green light to the Schimpf Farm project, an inappropriately scaled, high density development in a residential neighborhood that is already saddled with huge traffic problems. What is the point of these comments and goals if the town does not follow through on them? If the issue is the town’s codes, then fix the town codes.

Expand initiatives to safeguard neighborhoods from inappropriately scaled development. Development whose density or bulk far exceeds those of surrounding established residential neighborhoods will be discouraged. Through strict interpretation of zoning laws and outreach and education for officials and

developers, the Town can protect its neighborhoods from the environmental and aesthetic damage out-of-scale development can cause. In addition, the Town will require supplemental landscaping, increased buffers and the installation of fencing or other screening to protect neighborhood cohesiveness and mitigate nuisance.

So what initiatives are you proposing? As stated previously, variances are given even when there is clear opposition and reasons for not granting. Comments from the county are overridden, even when the comments are valid. What guarantees do we have that the town will actually stand behind these initiatives?

Response 28.7: Several of the initiatives proposed to be expanded are listed in the goal description. “Supplemental landscaping, increased buffers and the installation of fencing or other screening,” are all methods currently employed by the Town during the development review process to protect residential areas from the impacts of adjacent development. Other methods will be considered, and, as stated, current measures may be expanded and/or increased. It should be noted, that as currently proposed, the Schimpf Farm senior housing project does not require any variances and it is up to the Planning Board to determine the appropriateness of the scale of this or any other proposal under their review.

Comment 28.8 – (Jennifer McPhee, June 19, 2021): I think the town should hold off and thoroughly investigate the concept of the transferring of development rights program. While it sounds like a win-win, we have found that if not properly vetted and implemented correctly, changes of this magnitude can be manipulated and misused.

Response 28.8: The referenced goal, calls for the Town to “consider” a transfer of development rights program. At this time, the program is only a suggestion and no details have been developed.

Comment 28.9 – (Jennifer McPhee, June 19, 2021): More time and work should be put into sustainability. Outside agencies should be used and their findings should be made public.

Response 28.9: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 29.1 – (Scott Milich, June 21, 2021): During the Clarkstown Comp Plan 2020 comment period, I left comments regarding the need for housing options for millennials, Gen Z and older adults coupled with the Major Regional Shopping Centers need to reinvent and reengineer themselves to keep up with the changing nature of retail. As seen throughout the country, incorporating market rate multifamily housing, hospitality and medical to large shopping centers such as the Palisades Center Mall and the Shops at Nanuet will help to revive

and stabilize the properties; positioning them for long term success.

As I read through the 2021 Comprehensive Plan Update, I was very pleased to see in several areas that my comments and those similar to mine were taken seriously and in one way or another mentioned in the plan update; thank you for that. As stated in section VI Implementation; g) Land Use Changes, “Flexible new zoning” for MRS is crucial, housing should be allowed; as well as, medical. I believe their ability to be a real mixed use property is the key to their success and the overall success of the Town and County.

Response 29.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 30.1 – (Thomas Hinzman, June 21, 2021): I wanted to submit a comment on the Economic Development section of your comprehensive plan. I believe that changing zoning so our larger retail centers can add housing will help fill the empty space and bring some vibrancy back to those locations. It will also draw young families and new businesses that will help in keeping our economy healthy.

Response 30.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 31.1 – (Carlos Martinez, June 21, 2021): I’m once again writing in support of both residential and/or hotel space at the Palisades Center. As the CEO of a business within Palisades Center, I have a first-hand account for the need. Residential space for the next generation and a hotel space for Palisades Center’s customers and travelers to our county, will grow our economy here in Rockland. The benefits - construction and permanent jobs, generating revenue for the Town, creating a true live/work/shop/play community – far outweigh any negatives (if any). I truly believe it’s time that we think about our retail spaces and help them evolve!

Response 31.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 32.1 – (Gale Pisha, June 21, 2021): While some of the goals of this Draft Generic Environmental Impact Statement are more general than I expected, I think the plan to form a Town Sustainability and Resiliency Committee to recommend specific actions should definitely be implemented.

The committee should review and consider specific recommendations made by residents during the development of the 2021 Update. For example, for the goal to “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality” (p. 2), Specific recommendations in addition to limiting impervious pavement, acquiring more open space, and requiring stormwater runoff management for new development could include

requiring water neutral building practices for new construction and discouraging the use of lawn fertilizers and lawn watering.

Response 32.1: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 32.2 – (Gale Pisha, June 21, 2021): The only goals of the 2021 Update that I strongly oppose are those of replacing the soccer field at Zukor Park with artificial turf and constructing a domed sports facility which will also use artificial turf. Last November, Rockland residents were informed by Suez Water New York that levels of PFOA, one of a family of PFAS chemicals, exceeded New York’s Maximum Contaminant Level of 10 parts per trillion in some of the wells which feed into our water supply. Since then, the public has learned a lot more about these “forever chemicals,” which have serious health impacts on humans, particularly pregnant women, infants and children. See <https://www.ewg.org/areas-focus/toxic-chemicals/pfas-chemicals>.

Studies have shown that PFAS chemicals are used in the manufacture of artificial turf. See <https://www.ewg.org/news-insights/news/new-studies-show-pfas-artificial-grass-blades-and-backing>. Since the soccer field at Zukor Park and presumably the sports facility would be used extensively by children, Clarkstown should strongly consider the health effects from exposure of children to this product through physical contact and breathing the toxic fumes.

A related concern with artificial turf is that it is not maintenance-free, as some people assume. Washing it utilizes herbicides and pesticides, which can run off into the water supply along with other toxic chemicals used in artificial turf’s production as the turf degrades over time. Because it heats up with exposure to sunlight, it must be wet down so people can walk on it during hot weather. Water for washing and cooling the turf could be better used to water a drought-resistant species of grass, which sequesters carbon dioxide and releases oxygen. See <https://sustainablerossmoor.org/artificial-grass/> for more details.

In fact, the goal cited above of protecting our potable water will be threatened by installing artificial turf. Therefore, I urge Clarkstown to reconsider the plan to install any artificial turf; we should be avoiding its use in general and avoiding exposure to it, especially by children.

Response 32.2: The goals, “Replace the existing soccer field at Zukor Park with artificial turf,” and “Construct a multi-use, domed sport and recreational facility,” have been modified to remove references to the use of artificial turf. The Town will evaluate alternative options for fields with the potential for year-round use.

Comment 32.3 – (Gale Pisha, June 22, 2021): I would like to submit an additional comment regarding water conservation. I would like to see Clarkstown take more aggressive action than is

currently specified in the Plan to promote water conservation through discouraging lawn watering, promoting indoor water conservation and requiring new construction to be water neutral in many ways, not just with water-saving fixtures, which are already required for new construction by New York State. Ideally, Clarkstown would even limit construction of new houses and businesses, especially in the vicinity of Lake Deforest.

We have a limited supply of water in Rockland, some of it coming from Lake DeForest Reservoir and the rest from wells. Clarkstown surrounds this reservoir, including upstream of the reservoir. Whatever the Town can do to protect the safe yield of the reservoir will help us avoid the need for an expensive new water supply source in the future.

Land in the town that slopes toward the reservoir provides runoff and recharge to the reservoir which, in turn, makes up the safe yield of the reservoir. Any wells that are located in this area will intercept ground water that otherwise would flow into the reservoir and thus reduce its safe yield. These wells provide water to the homes and businesses of Clarkstown, which is converted to wastewater and discharged to the Hudson River, taking it out of our watershed.

In the summer these wells also are used to irrigate the lawns of these homes and businesses. Irrigation is estimated to be 90% consumptive; only about 10% recharges the aquifer flowing into the reservoir. It would be in Clarkstown's best interest to implement an aggressive indoor and outdoor conservation program that is within its legal authority to protect the safe yield of the reservoir.

Response 32.3: The Environmental Resources goal, "Protect and conserve both the sources and supply of potable water and the natural features which add to water quality," promotes the protection and conservation of water resources.

Comment 33.1 – (Steven Yassky, June 21, 2021): I am writing this letter to support the inclusion of residential development in the Town of Clarkstown's revised MRS Zones. Under your guidance, Clarkstown has been progressive in many of their planning policies in recent years. I have seen the positive benefits of other zoning amendments created to accommodate changing uses by businesses, a new TOD Zone in Nanuet to attract commuters, and the development of downtown areas to retain young people in Rockland County.

It is time we look at how the retail market is changing throughout the country. This past year's pandemic has accelerated the need to diversify Clarkstown's major mall sites into lifestyle centers that include shopping, healthcare, dining, housing, hotels, and more. The inclusion of housing in our MRS Zones will help retain our youth, firm up our tax base, and stabilize these properties for years to come.

It is important to note, that the impact of traffic should be minimal, if at all, since the site and road improvements to handle these retail centers were designed to handle much greater volume. My partners and I strongly ask for Clarkstown to allow housing as part of their modifications to the MRS Zone.

Response 33.1: The Economic Development section goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the addition of housing in such retail areas.

Comment 34.1 – (Tilcon NY Inc., June 22, 2021): While we are aware that there are certain general statements in the Comprehensive Plan regarding alleged dust impacts from Tilcon’s mining operations, please note that Tilcon takes great efforts to utilize best management practices to control dust at its mining operations to satisfy the conditions in its DEC mining permit. Tilcon takes great pride in its environmental compliance record and in being a good neighbor. If there are alleged issues with respect to dust, or any operational issue, we ask that they be brought to our attention so that they can be reviewed and responded to.

Response 34.1: While we value the diverse base of industrial companies operating within the Town, a number of goals within the Comprehensive Plan involve the monitoring, mitigation and elimination of air pollutants. The Town will continue to investigate and take action upon any complaints received, and reach out to businesses as necessary to reduce air pollutants.

Comment 34.2 – (Tilcon NY Inc., June 22, 2021): The Comprehensive Plan does not recognize the importance of the geologic deposits found in the Town and the need to preserve these resources for future needs of governmental infrastructure projects, highway projects, and commercial and residential developments. The Comprehensive Plan should recognize that the Town contains important geologic sources that are available to meet the present and future demand for aggregate resources both locally and regionally.

The Town should allow for zoning that allows the extraction of aggregate resources in the Town to meet local and regional demand for aggregate resources. Construction aggregate is an essential raw material for any construction project. Aggregate is used to build, repair and maintain highways, bridges, dams, and bank abutments; in bituminous and ready mix concrete products; for flood control; ice control during winter driving conditions and in residential and commercial developments. There exists a continuing need for this resource that the Town should recognize in the Comprehensive Plan. Planning for future supplies is vital for the local economy.

Tilcon’s mining operations are an important contributor to the local economy. This economic contribution goes well beyond just direct employment of local residents. Companies supply goods and services to Tilcon’s operations use local stores, restaurants and other local amenities. Real estate, highway use tax, fuel tax and sales taxes from these operations are a major portion of local, county and state government income.

Location of aggregate resources is a function of geology, not political boundaries. Appropriate aggregate reserves are only found in locations determined by the geology. So, while other uses subject to zoning may be located in areas of the town using traditional planning tools, planning for the use of aggregate resources to meet the community’s future need for aggregate must take into account where the resource is located.

If other development is allowed in the areas where quality sand, gravel and stone resources are geologically located, the resources will be built over and made unavailable for future generations.

Importantly, distance from source to end use is a crucial factor in determining cost to the purchaser, including municipalities whose financial ability to meet increased costs is limited. It has been found that on average the price of the material will approximately double for each additional 20 miles construction aggregate has to be trucked. This is especially important for local governments and their highway departments who have strict budgetary constraints. This is another reason why the Comprehensive Plan should recognize and protect its sources of local aggregate.

Aggregate resources are non-renewable. Local supplies are being depleted. Municipal planning dictates that future reserves should be set aside to meet future needs of the municipal users and to promote regional development. This is consistent with sustainable and smart planning. The availability of reasonably priced aggregate products for towns, villages and Rockland County and its residents is directly dependent on local sources of aggregates.

We urge the Town to consider the above and to incorporate the planning for preserving future mineral reserves in the Town into the Town Comprehensive Plan, which can serve as the basis for future zoning decisions in the Town, which will be necessary to protect the Town and regions' aggregate resources and ensure that those resources continue to be available for use in future infrastructure projects, such as road, highway and bridge construction, and residential, commercial and industrial development projects.

Response 34.2: The Comprehensive Plan does not recommend any specific alterations to the Manufacturing (M) zoning districts, in which Tilcon's quarries are located. The State of New York is responsible for the regulation of mining operations.

Comment 35.1 – (Margie Turrin, June 20, 2021): Including that Clarkstown is a WaterSense partner and will incorporate WaterSense into regular communications and programming with the residents will strengthen the plan.

Zoning Initiatives that Encourage Environmentally Sound Building Design: this is a place where the water conservation items discussed at the top of the document (#12, #16, #18 and #20) should be included. The discussion here is around LEED certification, but WaterSense development is also a critical factor in sustainable design. Planning with water use at its heart in order to create new development that is self-sustaining in water use and reuse is important. Working with planners and builders who focus on incorporating WaterSense design in their work is critical for sustainability.

Response 35.1: A reference to the EPA's WaterSense program has been added to the Sustainability & Resiliency chapter of the Plan.

Comment 35.2 – (Margie Turrin, June 20, 2021): I note that the only mention of Water Conservation in the plan is on page 38 where it mentions it in relation to drought and stormwater

management. Drought and storms are two extreme situations that do not encompass the need for comprehensive water conservation! A Water Conservation Plan for Rockland County...has 20 key elements, all of which are important and have a role in Clarkstown's planning, with several that should be incorporated directly into your planning blueprint. All of the items highlighted here should be included in the Sustainability section of the Comprehensive Plan, but additionally I would encourage adding the County Water Task Force as a listed partner and Water Conservation highlighted as a partnership program.

Develop programs to educate Clarkstown residents on issues of sustainability and resilience: This is an important goal and one that will have long reaching effects. Partnering with groups already involved in doing this in the County will build a broader network of outreach. Again linking with the Water Conservation Plan is critically important.

...tie land use of subdivision code variances to measures documented in a water conservation plan prepared by the developer (pg. 58 of the plan).

...adopt a retrofit-on-resale ordinance that either requires the buyer or the seller of a property to replace inefficient plumbing fixtures upon sale (pg. 68 of the plan).

...establish requirements for new construction to include water efficiency standards for indoor and outdoor water use (pg. 72 of the plan).

...implement green building codes related to water conservation, efficiency and management (pg. 77 of the plan)

The following items [from A Water Conservation Plan for Rockland County] are directly related to education and can become part of a partnership program:

- Item #3: Sustainable Landscaping Education Program
- Item #4: Water Awareness Events
- Item #5: Water Conservation Education Program

Furthermore there are incentive programs that work both to build recognition for businesses and residents in the community.

Response 35.2: The goal "Create a Town Committee on sustainability and resiliency," in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town's sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee's task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, outlines several ways the Town is committed to mitigating the potential impacts upon water quantity and quality. The Town will work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan. A reference to this cooperation

has been added to the Environmental Resources section of the Plan and Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives.

Comment 35.3 – (Margie Turrin, June 20, 2021): It is indeed a high priority to establish a wetland protection ordinance. This is critical in protecting water quality and water function in the Town. This should be a high priority for action.

Response 35.3: The Environmental Resources section goal, “Enact a wetland protection ordinance (subject to the procedures required by State Law)” calls for the establishment of such an ordinance.

Comment 35.4 – (Margie Turrin, June 20, 2021): As noted, in the 2009 Comprehensive Plan John Mickelson completed an extensive biodiversity study. A summation of some of the findings is included, but it appears an update to the Tree Preservation Law and invasive species removal are the two outcomes of this work. These are both important steps but are baseline in the planning process. Consider habitat protection in relationship with the rich bird species noted in the study, with 75 of the 250 noted to be considered by the State Audubon Society to be on decline related to loss of habitat (pg. 45). Protecting existing habitat is critical for their continued presence.

Response 35.4: The Environmental Resources section goals, “Continue to require more detailed flora and fauna surveys during reviews of development proposals on properties which might contain species of concern” and “Continue the acquisition of open space to preserve natural habitats” both promote the protection of wildlife habitats.

Comment 35.5 – (Margie Turrin, June 20, 2021): Continued work in educating community members of the environmental resources that exist in our parks and opened areas should be prioritized for inclusion. This will help with ongoing support for both acquisition of open space to preserve natural habitats and establishing habitat corridors, as well as with work to designate critical environmental areas in Clarkstown.

Response 35.5: The Sustainability and Resiliency section includes the goal, “Develop programs to educate Clarkstown residents on issues of sustainability and resiliency.”

Comment 35.6 – (Margie Turrin, June 20, 2021): While I can see the goal of trying to build in additional use time for the field I am adamantly opposed to installing artificial turf [at Zukor Park] for several reasons.

- Artificial turf has been tied to an increase in sports injuries as it does not offer the same ‘give’ or response to the placement of a foot or body weight.
- Skin abrasions are much more of an issue with artificial turf as the material used is rough and abrasive, generating opened wounds when athletes fall on the material.
- There are other health related risks with artificial turf. The materials have been linked to health issues in the inhalation of small particles and materials and are associated with PFOA and PFAS chemicals.
- Heat is another consideration with artificial fields. Grasses actually cool the area and keep the field at a lower temperature for players, where artificial turf is associated with

heat stress in players, especially in the summer months. Instead of reducing heat it increases the temperature of the playing area.

The entire discussion above applies equally to the development of indoor playing fields with artificial turf.

Response 35.6: The goals, “Replace the existing soccer field at Zukor Park with artificial turf,” and “Construct a multi-use, domed sport and recreational facility,” have been modified to remove references to the use of artificial turf. The Town will evaluate alternative options for fields with the potential for year-round use.

Comment 36.1 – (Darwin Keung, June 22, 2021): As a lifelong Clarkstown resident who grew up here, I would love to see more bike lanes and signage for connecting our town with public transit options for kids and families to get around. A bike lane from Zukor Park to Main Street and Downtown New City would be great to see.

Response 36.1: The Transportation goal “Create a cycling environment that is accessible, safe, and enjoyable,” promotes the expansion of cycling infrastructure throughout the Town.

Comment 37.1 – (Deborah Munitz, June 22, 2021): First goal to change zoning to expand commercial and industrial development without conflicting with residential uses should be expanded to state that new zoning will not conflict with environmental goals such as protecting remaining forested areas, affecting water supply quantity and quality, and not substantially increasing water demand. For example, a data center is a commercial and industrial use that is environmentally impactful to water supply and does not generate a lot of local jobs; this type of commercial expansion may not be suitable in Rockland County where we are constrained to the water supply within the Rockland County borders.

Response 37.1: Section VII of the Updated Comprehensive Plan details mitigation measures for potential impacts of the Plan, including tree removal and water quantity, quality and demand. The Economic Development goal “Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town’s existing infrastructure and will not conflict with existing residential uses,” support the preservation of Clarkstown’s neighborhoods, while providing for commercial development opportunities in areas best suited for such uses. The environmental impacts of individual developments are considered by the Town’s land use boards during the environmental review process.

Comment 37.2 – (Deborah Munitz, June 22, 2021): The goal of reusing existing built retail space for residential can serve the purpose of decreasing the pressure to rezone residential areas where there are still trees. Perhaps that objective should be added to that goal.

Response 37.2: The Economic Development goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” inherently promotes the preservation of natural areas by allowing re-development of existing facilities.

Comment 37.3 – (Deborah Munitz, June 22, 2021): Under environmental resource goals, limits on total development coverage should be expanded to consider limits on land disturbance. Too many land use projects rely on substantial clear cutting of land and the replacement of mature trees with small saplings. This Rockland County wide problem should be addressed.

Response 37.3: The Environmental Resources goal, “Continue to enact limits on total development coverage for all zoning districts,” supports the ongoing efforts of the Town in limiting disturbance of natural areas and decreasing impermeable surfaces. Additionally, the Town currently requires Stormwater Pollution Prevention Plans for any land disturbance in excess of 10,000 square feet, which is far below the State requirement of 1 acre (43,560 square feet).

Comment 37.4 – (Deborah Munitz, June 22, 2021): Under environmental resource goals several goals from 2009 that had not been addressed were repeated. Is there a reason these objectives had not been addressed since 2009? For instance, enacting a wetland ordinance or stream protection ordinances? (Consider reviewing the Village of Montebello ordinances.)

Response 37.4: Many of the goals and objectives of this updated Comprehensive Plan have been carried over from the original 2009 Plan. Some of the goals and objectives have not yet been accomplished, while others are more general policies which the Town has worked toward though a number of actions.

Comment 37.5 – (Deborah Munitz, June 22, 2021): Add to environmental resource goals the objective of tracking water demand projections for all applications that are going through planning, zoning board and Town Board rezoning and special permit reviews. Rockland County needs a way to figure out where we are with respect to water supply and the annual reports submitted by Suez only account for current demand. The potential demand based on full development under existing zoning, approved projects that are not yet built and on any increases beyond that which can be built under existing zoning due to rezoning or zoning variances needs to be calculated to form a basis for future planning reviews. Clarkstown must do its part and should consider lobbying for this accounting function to be addressed by the Rockland County Department of Health across all Towns in Rockland. This water demand tracking should be tracked so that approved projects can be tallied separately from those in consideration. Included in the tracking should be a listing of projects submitted to Clarkstown from adjoining municipalities as well.

Response 37.5: The Town previously participated in a water demand tracking program managed by the Rockland County Department of Health. We encourage the County to continue this program, in which the Town would again participate. The Town will work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan. A reference to this cooperation has been added to the Environmental Resources section of the Plan and Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives.

Comment 37.6 – (Deborah Munitz, June 22, 2021): The DGEIS environmental objective should include reviewing existing zoning ordinances to make sure that there is built in variability that relates to areas in Clarkstown. Building heights that are taller affect community character

less when closer to commercial areas versus in the more rural areas of town. The planning board should consider better ways to build in adjustments to zoning to preserve community character. For example, the zoning for active senior housing creates larger disparities with existing zoning as you go north creating concerns like that for Buckley Farms. Requiring more substantial zoning buffers to maintain a buffer of trees would help to address disparate zoning and maintain community character.

Response 37.6: Varying height and buffer requirements exist for a number of uses in the Town Zoning Code. As part of the Plan goals concerning neighborhood preservation, additional and/or expanded buffers and height requirements will be considered.

Comment 37.7 – (Deborah Munitz, June 22, 2021): In the health and safety section, Clarkstown should consider setting a good planning precedent where it requires that all planning applications be reviewed by local fire companies and that the fire departments are given escrowed funds to help pay for professionals to support their review efforts. Fire department review is more than minimum fire code and often reveals a different level of concern and recommendations.

Response 37.7: Development applications within Clarkstown are currently reviewed by the Town Fire Inspector’s Office and also sent to local fire departments for review.

Comment 37.8 – (Deborah Munitz, June 22, 2021): Recreation: Should speak with Town of Ramapo concerning the disastrous waste of money that was its ice rink.

Response 37.8: The Parks, Recreation and Open Space goal concerning the construction of a Town ice rink has been removed from the updated Plan.

Comment 37.9 – (Deborah Munitz, June 22, 2021): No mention of light pollution. Need to establish standards for commercial development regarding leaving lights on after sunset. Create standards for turning off unused lights and standards for window shades to mitigate the introduction of commercial uses (including houses of worship and private schools) introducing new lighting styles into residential neighborhoods. Building mounted lighting should be regulated to ensure all lighting faces down and does not cause visual glare to roadways.

Response 37.9: The Environmental Resources section goals, “Continue investigation of and action against complaints of noise, dust, odor and light pollution,” and “Continue to assess the potential for noise, dust, odors and light pollution in projects under review; require the elimination or mitigation of these pollutants as a condition of approval,” both address the reduction of light pollution within the Town.

Comment 37.10 – (Deborah Munitz, June 22, 2021): Groundwater resource discussion should be expanded to include some analysis of how basements can affect groundwater flow in commercial and multifamily developments where the ground is significantly dug up and made into subterranean impervious surfaces. The Town should consider getting an opinion from a hydrogeologist regarding whether there are recommendations on ways to adjust zoning codes to ensure less impact on groundwater flow.

Response 37.10: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources. The Town Department of Engineering and Facilities Management reviews development plans for issues related to water and drainage. When necessary, external consultants are retained to review plans.

Comment 37.11 – (Deborah Munitz, June 22, 2021): No discussion anywhere regarding consideration of where vertical parking should be considered to ensure that commercial area remained more vegetated and include usable open space/patio areas for workers and visitors to use. We need to end the cycle of turning commercial areas into parking lots. This topic should be considered and thoughts as to how to incentivize the development of new developments with publicly accessible patios and parks where parking lots would generally be included.

Response 37.11: Ground-floor parking is currently permitted and encouraged within the Town’s Hamlet Centers and TOD zoning districts, which also require additional greenspace. The Town will consider the expansion of these requirements into other zoning districts in the future.

Comment 37.12 – (Deborah Munitz, June 22, 2021): The Town should consider a study of noise throughout the various rural areas of the Town near vacant lots to establish a baseline of natural bird song and levels of noise. The loss of mature trees leads to a loss of bird habitat that affects the community character in a way that residents can’t easily articulate before the planning board but is important and should be considered.

There is no discussion of battery storage trailer installations. The Town of Ramapo has already had two applications. This is something that is a new technology that has positive and negative impacts that should be considered in advance. This should be considered. The positive benefit is regional at the expense of people in the area or the environment. There should be standards for screening and locating such installations. One such installation was approved on top of the primary aquifer on Dieltz road, and a key concern was what would happen if the batteries leaked or there was a fire since you don’t want certain fire-fighting chemicals used in that area.

Response 37.12: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 37.13 – (Deborah Munitz, June 22, 2021): There was no reference that I could find to the need to include more car charging stations and incorporating this into new development. The high-speed charging stations in Nanuet are instrumental in the Town but it’s a large number in only 1 area. Requirements for requiring charging stations in large existing lots and in all new lots should be considered.

Response 37.13: The Sustainability and Resiliency goal, “Develop programs to reduce greenhouse gas emissions,” includes the sub-heading “Transportation.” The promotion of fueling alternatives, such as EV charging stations would fall under this goal. EV charging stations are also discussed earlier in this section of the Plan.

Comment 37.14 – (Deborah Munitz, June 22, 2021): There was no discussion of cell service towers or boxes on light poles. This is a common concern when introduced into residential areas and there should be a discussion as to how such applications will be considered.

Response 37.14: The Environmental Resources goal “Preserve the suburban and remaining semi-rural character of the Town,” promotes limitations on certain types of development within the Town’s residential neighborhoods. Regulation of the installation of such devices would fall under this goal.

Comment 37.15 – (Deborah Munitz, June 22, 2021): Has the Town reviewed all zoning codes for how they relate to fire codes and considered a guide to the zoning board when considering variances? This is a problem in Ramapo where setbacks get reduced in way that do not violate fire code but cause fire safety situations where insufficient clearance is left to even be able to put up rescue ladders or where 3 story buildings are considered on streets with electric utility poles that get in the way of aerial apparatus trucks. The recent Spring Valley fire revealed problems with fire flow that were not adequately planned for. How will the Town make sure similar problems don’t occur in the future?

Response 37.15: The continued provision of code enforcement is covered under the Health, Safety and Welfare goal, “Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced.” Development applications within Clarkstown are currently reviewed by the Town Fire Inspector’s Office and also sent to local fire departments for review.

Comment 38.1 – (Jacquelyn Dreschler and Jocelyn DeCrescenzo, June 22, 2021): Although it seems that Clarkstown has moved forward in some ways, we are concerned about moving backwards on water conservation and on over development of Clarkstown. Many of the 10-15 projects before the Town are very large complexes that will strain the natural resources of Clarkstown and even of Rockland County itself. Just because something can be done - does not mean it should be done. Water conservation is of utmost importance and we do not believe that Clarkstown is doing enough to educate and inform citizens as well as builders and landscapers of the need to conserve water. Furthermore, just because Suez must sign off on its willingness to serve letters, doesn't mean that we won't run out of water. And then what? Desalination? Clarkstown continues to Pave Paradise with impermeable parking lots instead of permeable paving in its eagerness to please developers and bring in "rateables."

Response 38.1: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources. Additionally, the Environmental Resources goal, “Continue to enact limits on total development coverage for all zoning districts,” encourages the use of permeable pavers in order to comply with coverage maximums. The

Town previously participated in a water demand tracking program managed by the Rockland County Department of Health. We encourage the County to continue this program, in which the Town would again participate. The Town will work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan. A reference to this cooperation has been added to the Environmental Resources section of the Plan and Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives.

Comment 38.2 – (Jacquelyn Dreschler and Jocelyn DeCrescenzo, June 22, 2021): Part of the problem is zoning. Changing zoning to accommodate developers. To not be strong against people and companies who flout the rules. To not enforce fines.

Response 38.2: All zone changes must be in conformance with the Comprehensive Plan. The continued provision of code enforcement is covered under the Health, Safety and Welfare goal, “Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced.”

Comment 38.3 – (Jacquelyn Dreschler and Jocelyn DeCrescenzo, June 22, 2021): When zoning is changed to accommodate more "housing" whether "senior", 55+ etc, it creates more pollution as well. Fine particulate matter, emissions from trucking during construction, emissions from concrete, emissions from all of the cars of all the people who will be living in this housing. Please refer to page 90 of your draft plan. This does not align with the concepts of conservation and sustainability.

Response 38.3: The goals, “Improve residents’ health by reducing air, noise and light pollution related to motorized travel; Continue investigation of and action against complaints of noise, dust, odor and light pollution; Continue to assess the potential for noise, dust, odors and light pollution in projects under review; require the elimination or mitigation of these pollutants as a condition of approval” promote efforts to reduce air pollution within the Town. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, states that energy efficient designs will be used to mitigate building air emissions.

Comment 38.4 – (Jacquelyn Dreschler and Jocelyn DeCrescenzo, June 22, 2021): This kind of over development (over scaled buildings) does not enhance the quality of life for residents, does not fit in with the character of neighborhoods and is gravely concerning that developers are not encouraged or mandated to build in a forward thinking manner to consider climate change, resiliency or sustainability.

Response 38.4: The Housing goal, “Expand initiatives to safeguard neighborhoods from inappropriately scaled development,” promotes the preservation of neighborhood character from out of scale development. The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes.

Comment 38.5 – (Jacquelyn Dreschler and Jocelyn DeCrescenzo, June 22, 2021): We must do more to protect our woods and watershed. Please ensure that there is a superior and strong water conservation plan for now and for future generations.

Response 38.5: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources.

Comment 38.6 – (Jacquelyn Dreschler and Jocelyn DeCrescenzo, June 22, 2021): We have a great concern regarding "Accommodating New Industrial/Commercial Ventures in your New Goals section. We know that developers want to create "storage companies" and we are also very concerned about big block warehouse with diesel fuel pollution. Please do not set a precedent.

Response 38.6: The Economic Development goal, “Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town’s existing infrastructure and will not conflict with existing residential uses,” promotes situating such uses where best suited. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, outlines several ways the Town is committed to mitigating the potential impacts of commercial development.

Comment 38.7 – (Jacquelyn Dreschler and Jocelyn DeCrescenzo, June 22, 2021): We also have a major concern about artificial turf and the PFA's and toxins associated with artificial turf. We suggest no artificial turf in Clarkstown as the tuft contains PFA's, PFOA's and other toxins that inevitably will make their way into our water system. These PFA's and PFOA's are "forever chemicals." Turf used in public places such as Clarkstown Parks expose children and pregnant women to toxic fumes. Furthermore, carbon sequestering and drought resistant grasses (ie, zoysa) is a much more sustainable alternative.

Response 38.7: The goal, “Replace the existing soccer field at Zukor Park with artificial turf,” has been modified to remove the reference to the use of artificial turf. The Town will evaluate alternative options for a field with the potential for year-round use.

Comment 38.8 – (Jacquelyn Dreschler and Jocelyn DeCrescenzo, June 22, 2021): We are also concerned about the lack of a real - put into action public transportation plan in the draft.

Response 38.8: The Town’s Mini-Trans service is also the only such service provided on the town level within Rockland County. Public transportation plans are typically conducted at the County level. The Implementation chapter of the Plan promotes working within regional governments and agencies to aid in the achieving the goals of the Plan. The Town has worked with Rockland County in the past on public transportation projects, as evidenced by the Lower Hudson Transit Link project, and will continue in the future on projects such as the upcoming Route 303 and 304 studies.

Comment 39.1 – (Charles Thomas, June 22, 2021): Is there a definition that defines senior housing as different from age restricted housing? We concur with Mr. Gillies comment to

encourage more market rate and rental age restricted (55+) multifamily dwellings at higher densities. 30 per acre. Age restricted (55+) should include rental properties not just condominiums. Age restricted (55+) are as indicated, empty nesters. With no school age children the municipalities have another ratable with multifamily rental properties. Bedroom counts should be market driven. Most empty nesters want 2 bedrooms for office/guest room. One bedrooms are not preferred. As seen in the last year telecommuting is on the rise. 2 bedrooms will be in greater demand. People work into their 60's. Additionally, the 2 Bedrooms should be larger than 1,200 sf (closer to 1,500 sf), most of the senior renters are coming from larger homes and want larger spaces.

Response 39.1: Clarkstown's Town Code defines "Senior Citizen Housing" as: *A building or a group of buildings which have the total number of dwelling units specifically designed for the needs of persons age 55 and older which may or may not be constructed with the assistance of mortgage financing or other financial assistance insured by or procured through or with the assistance of a municipal, state or federal governmental agency, and which is constructed and maintained by an organization or its wholly owned subsidiary incorporated pursuant to the provisions of the laws of the State of New York. Subject to federal housing regulations, at least one member residing or proposing to reside in a dwelling unit shall have attained the age of 55 years or more on the date that such household initially occupies the dwelling unit and no persons age 18 or younger shall occupy any dwelling unit, with the exception of a superintendent's unit. This includes assisted care living quarters and senior citizen congregate housing.* The Housing goal concerning senior housing was expanded to read, "Plan for and develop additional housing units to provide homes for seniors of all income levels, lifestyles and levels of care."

Comment 40.1 – (Terri Thal, June 21, 2021): Increased building in Clarkstown has affected its streams; over the years, runoff from construction has dumped large amounts of debris into them. We are especially concerned about Crum Creek and West Branch, the streams that run into Lake Lucille and become the headwaters of the Hackensack River. Stream buffers protect the land adjacent to the streams from flooding, the streams themselves from degradation, and the habitat that lives near the streams from extinction. Clarkstown residents have built too close to too many streams. We urge you to set buffers for new construction at 100 feet on both sides of the streams.

Response 40.1: The Environmental Resources goal, "Establish stream protection corridors," promotes the enactment of such protections.

Comment 40.2 – (Terri Thal, June 21, 2021): Clarkstown should take measures to avoid water shortages; we recommend that the new Comprehensive Plan include water conservation as a consideration in planning and in allowing new construction; and that it regulates certain water use and promotes water-saving measures.

- Lawn watering is a major factor in creating water shortages. Clarkstown should limit it to avoid them. Some steps that we recommend incorporating into the Comprehensive Plan are:
- Establish lawn watering schedules. Ways to implement this are described in "Water Conservation Measure 19" of Rockland County's "Comprehensive Water Conservation and Implementation Plan" of March 3, 2020. They include: allowing

private irrigation to be set by address on a limited schedule of once or twice a week; not allowing outdoor irrigation when it's raining; limiting the length of time any user can water a lawn.

- Prohibit runoff from properties during irrigation.
- Give temporary exemptions by application and permit to allow for newly-planted grass, sod, vegetable gardens.
- Promote reduced lawn area and use of native plants.
- Promote self-administered residential indoor water audits.
- Develop green building codes and ordinances related to water conservation, as described in "Water Conservation Measure 20" of the County's 2020 document. These should include modifying Clarkstown's building code to incorporate recommendations in the US EPA's Sustainable Design and Green Building Toolkit for Local Governments, which is a detailed guide that takes user through an assessment, then offers guidance on addressing water reduction, innovative plumbing systems, wastewater treatment, water-efficient landscaping and irrigation.
- Remove requirements for paved driveways and encourage use of pervious pavement in both residential and commercial development.

As weather becomes more unstable, power outages are anticipated to happen more frequently. Clarkstown's Comprehensive Plan should address this. Suggested measures include:

- Absorb flooding via plantings and other nature-based features.
- Encourage or require green infrastructure in all new construction beyond the minimum stormwater requirements.
- Upgrade the Town building code the NYStretch Energy Code 2020, which requires energy-efficient building design in new construction and substantive renovation.

Response 40.2: The goal "Create a Town Committee on sustainability and resiliency," in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town's sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee's task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes. The Town will work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan. A reference to this cooperation has been added to the Environmental Resources section of the Plan and Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives.

Comment 40.3 – (Terri Thal, June 21, 2021): Both the Ramapo/Mahwah watershed and the Hackensack watershed should be protected from development. Clarkstown should lead in creating and participating in a Watershed Council comprising the five towns and County government that makes recommendations and, as possible, establishes rules related to water resources, aquifer protection, and water quality.

Response 40.3: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources. Additionally, inter-municipal agreements (IMA’s) are specifically listed as a method of implementation in accomplishing the goals of the Comprehensive Plan.

Comment 40.4 – (Terri Thal, June 21, 2021): Clarkstown has been a leader in obtaining and maintaining open space. Recently, though, it appears to promulgate building senior housing on areas that should be parkland or open space. It should consider obtaining property on South Mountain Road and elsewhere that adjoins already-existing open space and will mitigate some of the damage that apparently will be done by extensive building in next-door Ramapo.

Response 40.4: Environmental Resource goal, “Continue the acquisition of open space lands to protect sensitive environmental areas, as well as farmland,” promotes the further acquisition of municipal open space. When possible, lands adjacent to natural and/or protected areas are prioritized for acquisition.

Comment 40.5 – (Terri Thal, June 21, 2021): Davenport Preserve is the only property in Clarkstown that comprises undeveloped land and has a restrictive covenant designed to allow it to remain that. The house that belonged to Zipporah "Zippy" Fleisher and her husband Walter and the house and studios that belonged to Millia Davenport have been neglected by Clarkstown and allowed to fall into disrepair. Although the 1976 gift of land to Clarkstown did not mandate upkeep of the buildings, several years ago, West Branch’s then-president Martus Granirer was told by a representative of the U.S. National Register of Historic Places that if Millia Davenport’s buildings were repaired properly and maintained, they would be eligible for a listing on that Register. They should be repaired and turned into a small museum. The Fleisher house could be rented for public events.

Response 40.5: A reference to community participation in determining the future plans for the preserve has been added to the text following the goal, “Develop walking trails at Davenport Preserve.”

Comment 40.6 – (Terri Thal, June 21, 2021): There are several property easements in Clarkstown. Some now are held by West Branch Conservation Association and some by Skyview Acres Land Trust (SALT); others are held by not-for-profit organizations such as the Trust for Public Land. Although the land held through the easements is neither owned nor managed by Clarkstown, it might be useful for Clarkstown to have a registry of these—consideration could be given to their existence when the Town is considering whether to

acquire open space; if the parcel is near or adjacent to land held as an easement, a larger piece of open space would be created.

Response 40.6: The Town will continue the mapping of easements, to the extent possible, as part of expansion of its Geographic Information Systems (GIS) database, as stated in the Implementation section of the Plan.

Comment 40.7 – (Terri Thal, June 21, 2021): Incorporate protection of aquifer recharge as one of the goals of Clarkstown’s open space protection program.

Response 40.7: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” covers the protection of water sources, including aquifer recharge. Open space procurements have been and will continue to be made based on the environmental sensitivity of the properties considered.

Comment 40.8 – (Terri Thal, June 21, 2021): New York State has limited the amount of PFAS chemicals found in drinking water to a Maximum Contaminant Level (MCL) of 10 parts per trillion. Those chemicals, found in larger amounts in Rockland’s water, have been linked to many adverse health outcomes, including kidney and testicular cancer, thyroid problems, liver disease, decreased fertility, and developmental problems. They are found in everyday products such as artificial turf, fabric protectors, waterproofed clothing and shoes, certain nonstick pans, sunscreen, mascaras, some dental floss, sneakers, swimwear, takeout food containers, and other consumer products.

The draft of Clarkstown’s 2021 Update of its Comprehensive Plan calls for using artificial turf on the soccer field at Zukor Park and at a proposed domed sports facility. This product should not be used; a drought-resistant species of grass could be used on the soccer field. The domed sports facility, which would bring heavy traffic and noise to its neighborhood, should not be built. If it is, then drought-resistant grass could be used there, too.

Response 40.8: The goals, “Replace the existing soccer field at Zukor Park with artificial turf,” and “Construct a multi-use, domed sport and recreational facility,” have been modified to remove references to the use of artificial turf. The Town will evaluate alternative options for fields with the potential for year-round use.

Comment 41.1 – (Peggy Kurtz, June 22, 2021): As I wrote in August, there are three environmental issues that will profoundly shape our future. **On all three issues, there are actions that must be taken at the town level.**

The Comprehensive Plan should be the first step to confronting all three:

- **The climate crisis.** According to a report by the UN International Panel on Climate Change, the next ten years or less are critical years to change course in order to avoid runaway irreversible climate change. The town has already done a lot in terms of renewable energy and planning for resilience. Given the scope of the challenge, much

more will be needed. This is the major challenge of our time and it will impact everything. **The plan should be much more forthright and more specific.**

- A very serious crisis of **biodiversity**. As with climate change, the impacts will be profound. We can't solve this crisis, but it is our responsibility to address it. The plan should be more specific.
- We must plan for **limited water resources in Rockland County**, which will be affected by possible extended drought and by rapid population growth and development in Rockland and in Orange County. My hope is that Clarkstown will lead on these issues and will model best practices. **The draft plan mentions both water conservation and water quality, but only in very general terms.**

Rockland faces water shortages in coming years, which could be exacerbated by extended droughts due to climate change and which will surely be exacerbated by residential and commercial development that pushes the limits of our resources.

In March of 2020, Rockland County adopted an official Water Conservation Plan. Due to home rule, many of the initiatives in the plan will depend on the municipalities for implementation. **I urge the Town to do more to incorporate the goals in the Conservation Plan into the town plan.**

With close to one fourth of the County's population, Clarkstown has an essential role to play in conserving our water resources. In fact, Suez's Conservation Plan cites a study that shows that peak summer water use increases more in Clarkstown (and in Orangetown) than in the other towns¹. Given the fact that peak summer use is a key driver of demand and of the potential for need for new water supply, **the town has a responsibility to set summer water conservation as a key goal.**

Even if the town does not feel it is appropriate to include the specifics of implementation, the goals could nonetheless be much more specific than those currently included.

Goal: Consider water conservation as a goal in all public decisions.

Water Conservation Regulations and Incentives

3. **Encourage less water intensive development.** We should not be approving, let alone encouraging, water intensive new projects or industries. Note that the draft plan mentions water efficient fixtures as an offset. Water efficient **indoor** fixtures (which meet WaterSense standards) are already required by the state building code for all new construction. However, more efficient processes, cooling systems, and outdoor irrigation systems could make a measurable difference in reducing demand. The plan could include more specifics.

¹ Water Conservation Plan, BLACK & VEATCH PROJECT NO. 190485, PREPARED FOR SUEZ Water New York Inc., [APRIL 29, 2016, page 20 and others.](#)

4. **Establish tax benefits for new construction that meets WaterSense *Home* standards.** (WaterSense Certified Homes go beyond installation of WaterSense fixtures.)
5. **Establish protection of critical aquifer recharge areas as one of the goals of an open space protection program.**
6. **Incentivize green building practices (for water and energy) in new construction, such as those encouraged or required in advanced building codes such as LEED standards.**
7. **Encourage recharge of aquifers and reduce stormwater runoff by discouraging impervious surfaces.** Consider revising requirements for impervious driveways to encourage pervious paving and consider reducing space requirements for commercial parking spaces.
8. **Pass a ‘water waste’ ordinance and use public education to promote it.** ‘Water waste’ ordinances typically include:
 - a. Outdoor irrigation is prohibited when it is raining.
 - b. Handheld hoses used for lawn and landscape irrigation, vehicle washing, and other tasks must be equipped with an automatic shutoff nozzle.
 - c. Prohibit runoff from properties during irrigation
 - d. Prohibit hose washing of driveways, sidewalks, and patios
9. **Encourage rainwater harvesting with tax incentives.**
10. **Help to distribute rain barrels from Cornell Cooperative Extension of Rockland.**
11. **Reduce lawn watering, which is one of the key drivers of peak water demand.**
 - a. Require moisture and rain sensors on any new irrigation systems.
 - b. Discourage in-ground automated irrigation systems in new construction. Consider banning automated lawn watering systems in new construction.
 - c. Require that all automated systems be checked annually for leaks and needed adjustments. Provide information on how to perform a do it yourself irrigation system audit.
 - d. Establish lawn watering schedules. Recommendations for lawn watering restrictions are recommended in the County’s new Water Conservation Plan.
 - e. Incentivize reduced lawn area and native plantings in new construction.
 - f. Use educational programming and resources to encourage reduction of lawn in favor of native flowers or food gardens.
12. **Encourage self-administered residential indoor water audits through educational programs.** Provide template online.

[Climate] Adaptation - In recent years our area has been struck by flooding, extreme wind, and severe storms in which power was knocked out for large parts of the community for hours, days and sometimes weeks.

1. Establish micro-grid renewable energy-powered centers, perhaps distributed in Clarkstown community centers, which could provide energy, heating, and cooling in emergencies.
2. Consider working with local partners, such as schools and houses of worship to obtain grants to establish other micro-grids and emergency centers.
3. Plan for future severe storms, with appropriate plantings and other nature-based features to help absorb flooding.

4. Encourage and incentivize green infrastructure beyond minimum stormwater requirements in all new construction.
5. Remove requirements for paved driveways and incentivize pervious pavement.
6. Reduce requirements for parking lots in commercial development.
7. Protect water resources in the face of projected extended drought (as well as projected extreme precipitation). See recommendations above.

[Climate] Mitigation

1. **Participate in New York State programs that guide and assist communities through the process of mitigating their carbon footprint and increasing climate resilience: Climate Smart Communities and Clean Energy Communities.**
2. **Develop a much more detailed Climate Action Plan, that lays out a roadmap for action.**
3. Encourage the transition to renewable energy, electric vehicles, and sustainable electric heating. The town can promote these strategies through educational programs and tax breaks for:
 - a. installation of renewable energy
 - b. residential electric vehicle charging stations,
 - c. sustainable electric heating and cooling, such as air source heat pumps and geothermal installations
4. Require air source heat pumps in all new construction instead of furnaces powered by natural gas plus air conditioning².
5. Promote sustainable building design - i.e., design that minimizes impact on environment. Consider tax breaks for sustainably designed new homes, such as Energy Star construction – and higher tax breaks for LEED certification or National Institute of Building Sciences Whole Building Design certification.
6. Require certification in one of the building performance codes listed above for new construction over a certain size.
7. **Upgrade the town building code to the NYStretch Energy Code 2020 in order to require more energy efficient building design in new construction and substantial renovation.**
8. Launch an energy and water initiative for town buildings, including community and pool centers. Apply for funding for energy and water audits. Audits plus energy efficiency retrofits will save taxpayers' money and could be a first step toward renewable energy installation.
9. Install renewable energy to power town buildings and community centers.
10. Encourage backyard composting of leaves and of food. Use educational programming to teach composting of food and leaves. Set up annual dates to distribute discounted and secure food composting units from CCE.
11. Encourage mulching of leaves in the fall in programs such as Bedford's Leave Leaves on the Lawn. This would also cut costs for leaf collection.
12. Discourage illegal idling. Very few people are aware that idling beyond three minutes is illegal in Rockland County. Use public education and reminders at key spots, such as

² <https://www.sfchronicle.com/business/article/SF-bans-natural-gas-in-new-city-buildings-may-14984899.php>

schools during pick up time, to make people aware of the law and of the harm that idling does to our air quality. Use spot enforcement to telegraph the message.

13. Use public education to encourage vegetable gardens.
14. Consider creating community gardens in areas that have less access to back yards.

Water Quality Protection

1. In order to protect the water quality of local streams and groundwater, ensure that the town is using less harmful alternatives to ‘road salt’, the minimum effective quantity of road salt or the least harmful effective type of road salt.
2. **Establish a program to actively discourage homeowners and landscapers from overuse of fertilizers and other lawn chemicals.**
3. **Focus on education about lawn chemicals for homes around the reservoir and its tributaries.** Consider creating a zone around Lake DeForest in which lawn chemicals would be banned. Establish a wide buffer zone for the reservoir, in which vegetation cannot be cleared unnecessarily.
4. Take a closer look at possible runoff from French Farms composting facility into the reservoir in order to avoid the growth of bacteria and algae.

Response 41.1: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes. The Town will work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan. A reference to this cooperation has been added to the Environmental Resources section of the Plan and Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives. A reference to the EPA’s WaterSense program has been added to the Sustainability & Resiliency chapter of the Plan.

Comment 41.2 – (Peggy Kurtz, June 22, 2021): Watershed Protection - Rockland will need watershed protection plans. This seems particularly urgent for the Ramapo/Mahwah watershed, where rampant development in Ramapo and Orange County threatens the adequacy and water quality of our shared watershed. We will also need a watershed protection for the Hackensack watershed.

1. Work with the County Water Task Force and with other municipalities to create a shared watershed protection plan and an ongoing Watershed Council to address development beyond our water resources, protection of aquifers, and water quality issues.

Response 41.2: The Environmental Resources goal, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” promotes the protection and conservation of water resources. Additionally, inter-municipal agreements

(IMA's) are specifically listed as a method of implementation in accomplishing the goals of the Comprehensive Plan. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes. The Town will work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan. A reference to this cooperation has been added to the Environmental Resources section of the Plan and Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives.

Comment 41.3 – (Peggy Kurtz, June 22, 2021):

2. **Work to establish tracking for projected water demand for all new construction proposals.** In a county which faces potential water shortages, it is essential to review water demand as new projects are reviewed. The town should work with the county to establish a coherent, continuously updated system that will inform decisions at the town level.
3. **Review projected water demand as one of the criteria in the review process for all new projects.** Rockland County has limited water supply. The County needs a water budget and a strict tracking system.

Response 41.3: The Town previously participated in a water demand tracking program managed by the Rockland County Department of Health. We encourage the County to continue this program, in which the Town would again participate. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes. The Town will work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan. A reference to this cooperation has been added to the Environmental Resources section of the Plan and Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives.

Comment 41.4 – (Peggy Kurtz, June 22, 2021): The Sustainability Committee could become an important forum to craft a policy on climate adaptation and mitigation. In order to get public input and secure public acceptance, I suggest that the Sustainability Committee include representatives from different sectors in the community. I hope that this committee will develop an actionable Climate Action Plan.

Response 41.4: It is the intent of the Town to include such a diverse group of members on the planned sustainability and resiliency committee.

Comment 41.5 – (Peggy Kurtz, June 22, 2021): Protection of Trees and Natural Habitat

1. Adopt a tighter tree preservation/landscape ordinance that more strictly *limits* disturbance to or clearing of existing trees and vegetation and requires replacement of trees with native and climate resistant trees.
2. Extend protection to younger trees. (If only mature trees are preserved, then we are losing younger trees that would have become mature trees.)
3. Extend protection to non-native trees and secondary growth.
4. Ensure effectiveness of the tree ordinance with higher financial penalties and with **stronger enforcement.**

5. Incentivize the planting of **new**, native and climate change-resistant (drought resistant and deeper rooted) trees during construction so that we can **restore** the canopy as much as possible.
6. Establish an online set of recommendations to residents in regard to native, climate resistant trees. Consider establishing a tree commission that could advise residents and better inform plantings by the town.
7. Street trees can be one measure to relieve extreme heat. Set targets to plant climate resilient street trees for shade and aesthetics and apply for funding to make this possible. Develop a street tree maintenance plan relying on local volunteers or Rockland Conservation & Service Corps.
8. Incentivize clustered development in new construction, in a way that maximizes retention of natural habitat, including trees and brush, instead of lawn.

Response 41.5: The Environmental Resources goals, “Continue to enact limits on total development coverage for all zoning districts,” and “Protect wooded and natural areas from the removal of vegetation or other native materials which add to the character of the area,” both work to decrease the amount of impervious surfaces and unshaded areas, which contribute to the heat-island effect. The Tree Preservation Law is continually updated, and future revisions will consider more restrictive tree sizing for preservation purposes. Landscape plans will continue to be reviewed by the Town’s landscape architect as part of the review process of the Architectural Historic Review Board. Native and deer resistant plants are often recommended during this process to ensure proper plants are selected for our area. The planting of street trees is required by the Zoning Code, and clustering is encouraged to preserve natural areas. The continued provision of code enforcement is covered under the Health, Safety and Welfare goal, “Ensure that zoning, building and fire codes are current and enforced, and ensure that the conditions of site, subdivision, landscape and tree preservation plans are enforced,” which has been expanded from the 2009 Comprehensive Plan.

Comment 41.6 – (Peggy Kurtz, June 22, 2021): Habitat Preservation

We are on the brink of a very serious crisis of declining biodiversity and species extinction. Up to 1 million species are facing extinction, many within just decades³. Other species are declining dramatically, too. Habitat destruction is among the leading causes. Among many other impacts, many scientists see climate change and species extinction as among the key drivers of the recent increase in pandemics and epidemics⁴.

As with the climate crisis, we cannot solve this problem in Clarkstown, but the only responsible course is to desist from practices that are driving species extinction. Clarkstown has been a leader on environmental issues of all kinds. Clarkstown can set the pace for Rockland by adopting cutting edge practices to preserve habitat.

³ UN Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), 2019

⁴ <https://www.caryinstitute.org/news-insights/feature/how-stop-next-pandemic>

I have suggested some solutions under other headings. I hope the Comprehensive Plan will address this in ways that draw on best practices from other communities that are in the forefront on environmental protection. Many of the land use decisions that further the decline in biodiversity are made at the town level.

We must establish guidelines such that Planning Board decisions and Zoning Board variances will be seen in the framework of the larger picture, of the **cumulative** impact of their decisions. It's not enough to include the right language in the comprehensive plan. It's got to be enforced and carried out by the Planning and Zoning Boards.

Response 41.6: The Environmental Resource goals, "Continue to require more detailed flora and fauna surveys during reviews of development proposals on properties which might contain species of concern." and "Continue the acquisition of open space to preserve natural habitats," both work to assess the locations of, and preserve, animal habitats within the Town. The Planning and Zoning Board's decisions are guided by the Comprehensive Plan.

Comment 41.7 – (Peggy Kurtz, June 22, 2021): Open Space Program

Part of the special draw of our area is the beauty of the remaining natural areas and historic buildings. Once gone, we have lost something that cannot be recovered. Preservation of natural areas (in addition to parks used for recreation) provides a multitude of benefits: critical preservation of habitat for wildlife, watershed protection, enhanced quality of life for residents, recreation, cleaner air, carbon storage, help in absorbing stormwater, and finally, enhancing property values.

1. Prioritize an **active** open space program to preserve habitat.
2. Rockland faces serious water issues. **Prioritize protection of critical areas for aquifer recharge.**

Response 41.7: The Environmental Resources goals, "Protect and conserve both the sources and supply of potable water and the natural features which add to water quality," and "Continue the acquisition of open space lands to protect sensitive environmental areas, as well as farmland," promote the protection and conservation of water resources and acquisition of additional open space lands.

Comment 41.8 – (Peggy Kurtz, June 22, 2021): Transportation - According to data compiled for the Regional Greenhouse Gas Emissions Inventory⁵, 44% of our carbon footprint in this region is from transportation.

Accordingly, it is important to address greenhouse gas emissions from transportation and promote better health by promoting public transportation, electric vehicles, walking and biking.

⁵ Mid-Hudson Regional Greenhouse Gas Emissions Inventory, Prepared for NYSDERDA by ICF International, 2012.

1. Proactively plan electric vehicle infrastructure and vigorously promote maps with information about electric vehicles and charging stations.
2. Increase the use of mini-vans or other smaller alternatives to large buses in order to establish a more useful network of public transit.
3. Consider consolidating and merging with County fleets.
4. Convert to an electric bus fleet, using funding currently available from the state.
5. Install bike racks at critical locations, such as shopping areas, parks and transit hubs. Request bike racks at state and county parks.
6. Establish more bike lanes on critical arteries.
7. Require complete streets strategies.
8. Require review of complete streets checklist with any new development over a certain size.
9. Plant street trees to make walking and biking more attractive.
10. Incentivize mixed use development with small businesses included in any major new development. The best way to get people out of their cars is to put more things they need and want within easy and attractive walking distance. No one wants to walk on Route 59, no matter how wide the sidewalk, but they will walk if stores are close enough and on side streets.

Response 41.8: The goals of the Transportation section of the Plan promote these policies. The Implementation chapter of the Plan promotes working within regional governments and agencies to aid in the achieving the goals of the Plan. The Town has worked with Rockland County in the past on public transportation projects, as evidenced by the Lower Hudson Transit Link project, and will continue in the future on projects such as the upcoming Route 303 and 304 Studies. The Transportation goals, “Provide for commuter transit services that are accessible, efficient and safe,” “Develop Hamlet Centers with transportation options and connections,” and “Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation,” all support the use and improvement of transit services within the Town. Additionally, the implementation of the Complete Streets Program, which is a component of several of the Transportation goals of the Comprehensive Plan Update, promotes the development of roadways which are safe and efficient for motorists, cyclists and pedestrians.

Comment 41.9 – (Peggy Kurtz, June 22, 2021): Recreation and Parks

I strongly oppose the construction of a domed stadium - and the use of artificial turf. I oppose both on the grounds of unnecessary expenditure, given all of the athletic fields already available at schools, and I also oppose both on environmental grounds. Artificial turf and its backing contain PFAS and other harmful chemicals, some of them carcinogenic⁶. Artificial turf would expose children to these chemicals, which apparently are more likely to off gas in hot weather. Chemicals from the turf would also leach into our groundwater. This makes no sense, to knowingly expose ourselves to a non-essential use of PFAS.

Response 41.9: The goals, “Replace the existing soccer field at Zukor Park with artificial turf,” and “Construct a multi-use, domed sport and recreational facility,” have been modified to remove references to the use of artificial turf. The Town will evaluate alternative options for

⁶ <https://www.ehhi.org/turf.php>

fields with the potential for year-round use. The goal “Construct a multi-use, domed sport and recreational facility,” is included in the 2008 Recreation & Parks Master Plan (included in Plan Appendix), and remains a goal of the Comprehensive Plan. A number of athletic organizations within the Town have requested such a facility.

Comment 41.10 – (Peggy Kurtz, June 22, 2021): Light Pollution

Light pollution leads to energy waste, disruption of sleep and disruption of animal ecology. Declining numbers of lightning bugs are partly ascribed to light pollution and amphibians are also affected by light pollution.

1. Consider reducing or turning off lights on streets where the residents do not welcome the light and it is not needed for public safety. This could also reduce municipal costs.
2. Use public education to discourage use of floodlights on private property, in favor of lower wattage or lights on motion sensors.
3. Require motion sensors on any floodlights in new construction.

Response 41.10: As part of the Comprehensive Plan Update, the Health, Safety and Welfare goal “Develop zoning and building regulations, and implement roadway changes that reduce or restrict odors, sounds, light pollution, commercial traffic and other negative environmental impacts on residential areas,” as well as the Environmental Resources goals, “Continue investigation of and action against complaints of noise, dust, odor and light pollution,” and “Continue to assess the potential for noise, dust, odors and light pollution in projects under review; require the elimination or mitigation of these pollutants as a condition of approval,” were expanded from the 2009 Comprehensive Plan to include light pollution.

Comment 41.11 – (Peggy Kurtz, June 22, 2021): Noise Pollution

1. Consider much stronger ordinances to limit noise pollution, including for leaf blowers and other landscaping equipment.
2. Consider a ban on **the least necessary** use of **gas-powered** leaf blowers, over the winter and summer months, as was recently passed in Upper Nyack. There are no leaves on the lawn in the summer and winter.

Response 41.11: The Health, Safety and Welfare goal “Develop zoning and building regulations, and implement roadway changes that reduce or restrict odors, sounds, light pollution, commercial traffic and other negative environmental impacts on residential areas,” as well as the Environmental Resources goals, “Continue investigation of and action against complaints of noise, dust, odor and light pollution,” and “Continue to assess the potential for noise, dust, odors and light pollution in projects under review; require the elimination or mitigation of these pollutants as a condition of approval,” all work to reduce noise pollution within the Town.

Comment 42.1 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021): Watershed protection, water conservation, and water quality issues should play major part in the updated Comprehensive Plan. WATER is a vital resource for the Town as well as the whole County and I request that greater consideration be given to the topic in the Comprehensive Plan.

Related to the R&R, or alternatively through inclusion in overlay zoning districts and/or ordinances, create **specific protective buffers around wetlands, rivers and streams** to protect drinking water resources from land uses that could disturb or contaminate them during or after construction. Further, create **protected groundwater recharge zones**. Meaningful goals and strategies for these steps must be set out to assure implementation success.

Response 42.1: The following Environmental Resource section goals are included in the Plan to promote water quality and conservation:

- Protect and conserve both the sources and supply of potable water and the natural features which add to water quality
- Continue to enact limits on total development coverage for all zoning districts
- Require stormwater management to a higher extent than is currently applicable where development is proposed in watersheds which experience flooding
- Establish stream protection corridors
- Enact a wetland protection ordinance (subject to the procedures required by State Law)

Comment 42.2 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021): I have linked below the **Comprehensive Water Conservation and Implementation Plan**⁷, adopted by the County of Rockland on March 3, 2020⁸ and urge Clarkstown planners to include it in your updated Comprehensive Plan. I suggest that the Town include a goal to collaborate with the County Task Force on Water Resources Management as an implementation partner for the Rockland County Comprehensive Water Conservation and Implementation Plan.

Work with the County Water Task Force and with other municipalities to create a shared watershed protection plan and an ongoing Watershed Council to address development beyond our water resources, protection of aquifers, and water quality issues.

Rockland Water Task Force as a partner in the implementation of the above-mentioned Rockland County Comprehensive Water Conservation and Implementation Plan.

- **Designate a Town representative** to join the County Task Force’s Water Conservation Committee.
- The conservation plan includes 20 water conservation measures/strategies to help conserve our limited drinking water resources and prevent or delay the need for new water supplies – work with the Task Force on identifying the best strategies to be employed by the Town.

⁷ Link to the County Website PDF file of the County Water Conservation Plan:

http://rocklandgov.com/files/2416/0331/9060/RocklandCo_CompWaterConsPlan-Final_v2.pdf

⁸ See Rockland County Resolution 97 of 2020 accepting the County Comprehensive Water Conservation and Implementation Plan.

Response 42.2: The Town will work with Rockland County to implement the goals of the Rockland County Comprehensive Water Conservation and Implementation Plan. A reference to this cooperation has been added to the Environmental Resources section of the Plan and Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives.

Comment 42.3 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021):

Include a goal of assessing and establishing Critical Environmental Areas (CEAs) as set out by the SEQRA process and recommended by the 2009 version of the Town’s Comprehensive Plan. Not one CEA has been designated in the town as of yet. Specific action steps for the implementation of this goal should be included, such as the designation of a board or commission that may take up the task of getting started and creating a list of criteria for the selection of priority choices. A specific target number of CEAs could be included as an aspirational goal to get the process started. Only 4 CEAs have been designated in all of Rockland County to date. The Town has an opportunity to distinguish itself and lead in an effort in which it should be joined by other municipalities.

Response 42.3: The Environmental Resources goal, “Designate Critical Environmental Areas in Clarkstown,” continues to remain an objective of the Plan. CEA’s will be considered for designation based upon the environmental merits of properties.

Comment 42.4 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021):

Include as one of the goals the participation in the State’s DOH and DEC’s **Drinking Water Source Protection Program (DWSP2)**⁹ and any associated assessments and protective actions. This initiative will most certainly be connected to grant funding in the future and would offer a vehicle to specific action for protection of Lake DeForest and its tributaries. Planning to conduct an assessment would be the first step toward grant funds for specific projects. The admirable effort demonstrated by the Town planning staff and community in developing the updated Comprehensive Plan demonstrates the full capability for the Source Water Protection effort in which the County Water Task Force would prove to be a willing and active partner. In order to protect the water quality of local streams and groundwater, ensure that the town is using the **minimum effective quantity of road salt** and the least harmful effective type of road salt.

Establish a program to actively discourage homeowners and landscapers from overuse of **fertilizers and other lawn chemicals**. Put special emphasis on education program for homes around the reservoir.

Include specific **demand-side water conservation goals that go beyond** the current requirements of national and state laws.

- For example, while WaterSense fixture standards are now required by the State Building Code for new construction, include the same requirements for all retrofits and conduct an audit program in municipal buildings to replace old fixtures with new water efficient ones. Pass a procurement resolution to only purchase WaterSense efficient fixtures for

⁹ A link to NYS DEC website with DWSP2 Program information: <https://www.dec.ny.gov/chemical/115250.html>

any replacements in municipal buildings. **Lead by example** and work with the Task Force to encourage other partners to do the same.

I encourage the Town to include specific goals and objectives that deal with the Climate Change issues to enhance adaptability and resiliency, Source Water Watershed Protection, specific water quality goals, and demand-side water conservation goals and strategies.

Response 42.4: The goal “Create a Town Committee on sustainability and resiliency,” in the Sustainability and Resiliency chapter of the Plan has been updated to specify that, when constituted, the Town’s sustainability and resiliency committee will review the environmental policy and program recommendations received during the public outreach and hearing processes of the Comprehensive Plan Update. This review is intended to serve as a framework for the committee’s task of recommending new Town environmental policies. A reference to this committee and this task is also made in Section 6(a), Implementation – Policy Changes. A reference to the EPA’s WaterSense program has been added to the Sustainability & Resiliency chapter of the Plan.

Comment 42.5 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021):

Enact source-water protection Rules and Regulations (R&R), in accordance with the provisions of chapter 45 of the Consolidated Laws (Public Health Law). The Rules and Regulations must protect the drinking water resources located in the town, including public drinking water wells as well as natural or artificial reservoirs and their tributaries inside and outside of the Town’s borders, from the currently known sources of contamination and pollution. The R&R should be regularly updated. These R&R should be duly included in the 10 CRR-NY 139 (Official Compilation of Codes, Rules and Regulations of the State of New York under Title 10/Department of Health)

Response 42.5: We agree that these County Department of Health regulations should be regularly updated as recommended. The Town is willing to participate in any such efforts.

Comment 42.6 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021):

Similarly, through R&R or other ordinance or zoning strategies, create and implement specific **guidelines and/or restrictions for construction on steep slopes**, particularly in flood-prone areas and/or areas adjacent to water sources.

Response 42.6: The Environmental Resources goal “Protect Clarkstown’s ridgelines,” promotes the protection of steeply sloped areas within the Town.

Comment 42.7 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021):

The Town is further encouraged to refer to the **County Comprehensive Plan - Rockland Tomorrow**, adopted March 1, 2011, in order to couch its decisions in a regional perspective.

Response 42.7: A reference to the adopted Rockland County Comprehensive Plan has been added.

Comment 42.8 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021): In the last few decades, the County has seen an increase in flooding and superstorms that result in great damage and cost in every respect, including cost to human health and life. Climate resiliency and adaptability are a necessary part of planning for the future. The Comprehensive Plan must include specific goals pertaining to enhancement resiliency, sustainable design and development, and preservation of areas at high risk of recurrent flooding events (even if not yet included on FEMA Maps) and thus unsuitable for development.

Response 42.8: The Environmental Resources goal, “Require stormwater management to a higher extent than is currently applicable where development is proposed in watersheds which experience flooding,” and the Sustainability and Resiliency goal “Develop programs to increase the Town’s resiliency to the effects of climate change,” both promote efforts to reduce flood impacts within the Town. References to the All-Hazard Mitigation Plan (HMP) have been added to the Environmental Resources and Sustainability & Resiliency sections of the Plan.

Comment 42.9 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021):
Re-prioritize the open space program to preserve and protect the existing ecological and cultural treasures of the Town

Response 42.9: In order to select the most suitable parcels for open space preservation the Open Space Citizen’s Advisory Committee created a Priority Recommendations list in 2001. Along with that report (which is located in the Plan Appendix), the Town now also has several layers of Geographic Information System (GIS) data generated during the Biodiversity Study conducted for the 2009 Comprehensive Plan. This information (which can be found in the Figures in the Environmental Resources section of the Plan) further highlights ecologically sensitive lands within the Town that are most suitable for preservation. In addition, the goals of the Historic and Cultural Resources section of the Plan collectively work to preserve cultural resources within the Town.

Comment 42.10 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021):
Collaborate with the County on the Open Space program

Response 42.10: The Town has, and will continue to, partner with the County on open space purchase and preservation. Both Cropsey Farm in New City and the Marydell property in Upper Nyack were joint acquisitions between the Town, County and other agencies.

Comment 42.11 – (Harriet D. Cornell, Rockland County Legislator, June 22, 2021):
Utilize the open space program to protect **aquifer recharge zones**

Response 42.11: The Environmental Resources goals, “Protect and conserve both the sources and supply of potable water and the natural features which add to water quality,” and “Continue the acquisition of open space lands to protect sensitive environmental areas, as well as farmland,” cover the protection of water sources. Open space procurements will be made based on the environmental merits of the properties considered.

Comment 43.1 – (Maryanne Brancatelli, June 22, 2021): The trend of developing warehouses in concerning. Warehouses bring trucks, which, in turn, bring traffic and pollution which could negatively affect residences.

Response 43.1: The goals “Preserve the suburban and remaining semi-rural character of the Town,” and “Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town’s existing infrastructure and will not conflict with existing residential uses,” support the preservation of Clarkstown’s neighborhoods, while providing for commercial development opportunities in areas best suited for such uses.

Comment 43.2 – (Maryanne Brancatelli, June 22, 2021): With additional redevelopment being proposed for the Palisades Center, more vehicle traffic will be generated which will create noise. A sound barrier should be constructed along Route 59 to mitigate this impact.

Response 43.2: The Environmental Resources goal, “Continue to assess the potential for noise, dust, odors and light pollution in projects under review; require the elimination or mitigation of these pollutants as a condition of approval,” was expanded to include noise for the Comprehensive Plan Update. The Health, Safety and Welfare goal, “Develop zoning and building regulations, and implement roadway changes that reduce or restrict odors, sounds, light pollution, commercial traffic and other negative environmental impacts on residential areas,” was expanded to include the “implementation of roadway changes” for the Comprehensive Plan Update. Section VII of the Plan, the Evaluation of Potential Impacts of Goals & Objectives, outlines several ways the Town is committed to mitigating the potential impacts of commercial development.

Comment 43.3 – (Maryanne Brancatelli, June 22, 2021): Truck traffic generated by commercial businesses on Western Highway and the industrial complex in West Nyack owned by Onyx needs to be directed to Route 303.

Response 43.3: The Health, Safety and Welfare goal, “Develop zoning and building regulations, and implement roadway changes that reduce or restrict odors, sounds, light pollution, commercial traffic and other negative environmental impacts on residential areas,” was expanded to include the “implementation of roadway changes” for the Comprehensive Plan Update.

Comment 43.4 – (Maryanne Brancatelli, June 22, 2021): Developments should be designed to include a mix of both senior citizens and young adults. Smaller starter homes should be built to accommodate seniors who are downsizing and young adults who are starting to work and cannot afford and do not need larger, more expensive homes designed for families.

Response 43.4: The Economic Development goal, “Work to ensure that a variety of housing options exists within the Town,” promotes the development of multiple housing types within the Town.

Comment 44.1 – (Roberto Johnson, June 22, 2021): As a town resident, I would like to see the town of Clarkstown preserve its quite suburban character. This can be done by placing a high priority on regulating DENSITY. Earlier town planners seemed to have understood that less

density was the reason for suburbs, and strict zoning codes were assuredly their method for maintaining land space. In my area, West Burda Place & West Clarkstown Road, most of the lots are designated R-22 which basically means that for 42 years since my home was built, every acre of land comprised a minimum of two wood framed houses. If you calculate the average family size, 3.15 people according to census numbers for 2020, one acre of land has been the standard accommodation for six to eight people. Yet recent commercial developers in my residential community have proposed apartment units that would push density rates to 16 persons per acre. This will cause an enormous amount of QUALITY OF LIFE issue if the town does not figure out a course of action to limit this type of building density.

Response 44.1: The goals “Preserve the suburban and remaining semi-rural character of the Town,” and “Expand initiatives to safeguard neighborhoods from inappropriately scaled development” support the preservation of Clarkstown’s neighborhoods, while providing for development opportunities in areas best suited for such uses. It is up to the Planning Board to determine the appropriateness of the scale and densities of proposals under their review.

Comment 45.1 – (Joanna Galdone, June 22, 2021): I would like the Town to actively continue open space acquisition. Whatever parcels are left that can be saved from development should be considered. They are all critical since their inventory has dwindled so drastically. Any parcel of open space has the important potential to provide vital habitat.

Response 45.1: The Environmental Resources goal, “Continue the acquisition of open space lands to protect sensitive environmental areas, as well as farmland,” promotes the continued acquisition of such lands.

Comment 45.2 – (Joanna Galdone, June 22, 2021): Stream protection corridors should be created. Crum Creek runs through my property as well as through properties up and down stream. Some of the properties are maintained with no buffer zone along the stream, adding to storm water run-off from lawn areas.

Response 45.2: The Environmental Resources goal, “Establish stream protection corridors,” promotes the enactment of such buffers.

Comment 45.3 – (Joanna Galdone, June 22, 2021): The Town should make the Hackensack Watershed a Critical Environmental Area. This vital water resource must be protected.

Response 45.3: The Environmental Resources goal, “Designate Critical Environmental Areas in Clarkstown,” promotes the designation of such areas.

Comment 45.4 – (Joanna Galdone, June 22, 2021): Senior Housing should not be created on parcels of open/undeveloped land. That the town seeks to preserve open space while at the same time endorses senior housing on untouched land is contradictory!

Response 45.4: The Economic Development goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized

commercial spaces,” promotes the allowance of housing in areas which are already developed, thereby reducing development in other undeveloped areas of the Town.

Comment 45.5 – (Joanna Galdone, June 22, 2021): I endorse the removal of invasive flora from as much land in the town as possible. However, as someone who is very involved with the removal of invasive plants from my own property, I can safely say that it is not an easy task. The best management practices for the land and habitat preservation should be employed.

Response 45.5: The Environmental Resources goal, “Manage and remove invasive flora species, both terrestrial and aquatic,” supports such action.

Comment 45.6 – (Joanna Galdone, June 22, 2021): The routes for the trails at Davenport Preserve should be carefully plotted to avoid having the routes interfere with sensitive land/flora.

Response 45.6: A reference to community participation in determining the future plans for the preserve has been added to the text following the goal, “Develop walking trails at Davenport Preserve.”

Comment 45.7 – (Joanna Galdone, June 22, 2021): Add Phillips Hill Road to the town’s list of Historic Roadways. This roadway is a pre-Revolutionary roadway which in part follows Crum Creek. There is the site of an old blacksmith shop on my property just above Crum Creek as well as the foundation of a barn. A nearby sandstone house is from the 1600’s. The sharp turn just north of my property was made for horse and buggies- not fast-moving cars, as numerous accidents have proved!

Response 45.7: Additional roadways may be considered for designation as “historic” by the Town Board. The Historic and Cultural Resources goal “Expand upon legislation to ensure that those historic properties in private hands are not destroyed, or so renovated by subsequent owners as to lose their historic status,” has been modified to include the preservation of historic roadways.

Comment 45.8 – (Joanna Galdone, June 22, 2021): If our tree preservation law protects only large trees, where will the successive suburban forests of the future come from?! We must enact management practices that include the protecting of seedlings and saplings- both from deer and from developers.

Response 45.8: The Tree Preservation Law is continually updated, and future revisions will consider more restrictive tree sizing for preservation purposes. Landscape plans will continue to be reviewed by the Town’s landscape architect as part of the review process of the Architectural Historic Review Board. Native and deer resistant plants are often recommended during this process to ensure proper plants are selected for our area.

Comment 45.9 – (Joanna Galdone, June 22, 2021): Identify on town open space maps those parcels of land that are protected by private land trust/s. For example, my 5.2 acre parcel as well as the +8 acre parcel across Phillips Hill Road comprise Crum Creek Preserve. Both parcels provide habitat protection for flora/fauna as well as flood plain and stream corridor protection.

There are a number of other protected parcels on the town.

Response 45.9: The Town will continue the expansion of its natural resource mapping, to the extent possible, as part of expansion of its Geographic Information Systems (GIS) database, as stated in the Implementation section of the Plan.

Comment 45.10 – (Joanna Galdone, June 22, 2021): Deer management in the town is critical for protection of our native landscape, as well homeowner’s plantings. I try to maintain the majority of my property in its natural state, nurturing many indigenous plants. I spend much time and effort in the way of fencing and sprayed deterrents to protect this small bit of our natural heritage.

Response 45.10: Landscape plans will continue to be reviewed by the Town’s landscape architect as part of the review process of the Architectural Historic Review Board. Native and deer resistant plants are often recommended during this process to ensure proper plants are selected for our area.

Comment 45.11 – (Joanna Galdone, June 22, 2021): Finally, I have witnessed so much loss here of our natural world. I would like to acknowledge some species that are no longer seen in my area: Yellow-bellied sapsucker, Veery, Nighthawk, Whippoorwill, Yellow/Black-billed cuckoos, Eastern box turtle, Black snake, Wood turtle, Eel, Sucker, Fringed gentian, Pink/yellow lady slipper, Wood Betony, leopard frog, several salamander species.

Response 45.11: The Environmental Resource goals, “Continue to require more detailed flora and fauna surveys during reviews of development proposals on properties which might contain species of concern.” and “Continue the acquisition of open space to preserve natural habitats,” both work to assess the locations of, and preserve, animal habitats within the Town.

Comment 46.1 – (David Ramirez, June 22, 2021): The Comp Plan lists a set of goals and objectives that require a little more clarity to detail as to when these will be accomplished. A general schedule detailing the process length for these goals, with expected target end-dates should be included to ensure that they are addressed in a timely manner. The schedule should encompass a period of time until the next Update or new Comp Plan is expected.

Response 46.1: It is not feasible to create a schedule for the accomplishment of the goals and objectives of the Comprehensive Plan. Many of the goals and objectives are ongoing efforts which require a variety of actions made toward their implementation.

Comment 46.2 – (David Ramirez, June 22, 2021): Under a) Economic Development Goals, The Comp Plan goal on page 55 states: “Preserve the suburban and remaining semi-rural character of the Town.” This requires additional detail as to how this will be accomplished. In addition, Zoning Laws need to be enacted to actually preserve existing residential areas and not allow increase of density of any type. Preventing over-development in single-family zones, will help preserve the “suburban and remaining semi-rural character of the Town” as a byproduct. I feel that the Town should modify its code to prohibit the adjoining of residential zoning lots. Developers are circumventing bulk table requirements by creating larger lots in order to build

large out of scale projects that destroy the “suburban and remaining semi-rural character of the Town.” Allowing this activity contradicts the Town’s goal of preservation. This prohibition is enforced by other municipalities NY State and would cost nothing to implement.

Response 46.2: The Economic Development goal “Apply zoning changes to create and expand commercial and industrial development in areas that are best served by the Town’s existing infrastructure and will not conflict with existing residential uses,” and the Transportation goal, “Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation,” support the preservation of Clarkstown’s neighborhoods, while providing for commercial and residential development opportunities in areas best suited for such uses. Changes to regulations concerning residential lot mergers will be considered when revising the Zoning Code during the Implementation of the Comprehensive Plan.

Comment 46.3 – (David Ramirez, June 22, 2021): Also, the Comp Plan states: “Where Increasing density is warranted (i.e. active adult or volunteer housing,) enhancing the appearance or screening of the new development to lessen the impact of the surrounding area.” This is not preserving the suburban and remaining semi- rural character of the Town. This is contributing to its disappearance. Increasing density in Single-family zones should not be warranted.

Goals and Objectives stated in the plan seem to be contrary to projects that have been presented, entertained and in some cases approved by the land use boards this past year. Specifically, projects that overdevelop single-family zoned areas with construction other than single-family buildings have been or may yet be approved that destroy the suburban and rural character of the Town. The Town should have a goal to include the need for Affordable and Senior housing in areas that are convenient to their “use,” such as hamlet centers and or zones outside of but adjacent to the Single family zones, closer to, or within hamlet centers that will service them.

Response 46.3: The Economic Development goal, “Explore new zoning to permit housing in underutilized retail areas and other ways to re-use and re-purpose vacant or underutilized commercial spaces,” promotes the allowance of housing in areas which are already developed, thereby reducing development in other areas of the Town. The Transportation goal, “Create diverse mixed-use development areas that allow for walking and biking and are well-served by public transportation,” support the preservation of Clarkstown’s neighborhoods, while providing for commercial and residential development opportunities in areas best suited for such uses, such as the Town’s hamlet centers. Additionally, the Economic Development section includes the goal, “Consider the implementation of a transfer of development rights program.” A transfer of development rights program would allow the Town to increase development density in targeted areas, while decreasing density in areas selected for conservation.

Comment 46.4 – (David Ramirez, June 22, 2021): Why wasn’t a limited moratorium for the benefit of the Town’s residents implemented this past year? A moratorium is in fact recommended by NY State whenever a Comprehensive Plan is considered for change or update. Especially a moratorium on permits and construction in Single-family zones to prevent what has happened in the case Schimpf Farm, or is currently being proposed on other properties around the town, which are destroying the suburban and semi-rural character of these neighborhoods.

I was told by the Town back in June of last year that a moratorium would take too long to approve (around 6 months), yet here we are a year later, and a flurry of over development type projects that are blatantly out of scale with the surrounding neighborhoods, are being proposed and heard at the T.A.C. and Planning Board with a Comprehensive Plan still in the Draft stages.

Response 46.4: A moratorium was not enacted for the Comprehensive Plan Update, as this was an “update” and not a full re-write of the existing Plan. Development currently in progress is in keeping with the 2009 Comprehensive Plan. Moratoriums are more appropriate for large-scale zoning changes, and have been implemented by the Town in the past.

Comment 46.5 – (David Ramirez, June 22, 2021): The Comp Plan should require the Town to enact an automatic moratorium prior to the next New Comprehensive Plan or update to the existing one. In addition, the review of every land-use project submitted should be reviewed and required to ensure that it conforms with The Goals and Objectives in the Comprehensive Plan as well.

Response 46.5: The enactment of a moratorium is a discretionary decision of the Town Board and not under the purview of the Comprehensive Plan.

Comment 46.6 – (David Ramirez, June 22, 2021): Under b) Environmental Resources. A goal is stated that the Town will: “Continue the acquisition of open space to preserve natural habitats.” This goal conflicts with the Town’s intention to explore the possibility of developing the Rockland Country Day School Property. The goal refers to figure 18 in the draft, which appears to indicate that the Rockland Country Day School Property is an “Edge/Adjacency Parcel.” If it’s important enough to indicate that it’s an “Edge/Adjacency Parcel,” in an environmentally sensitive area, then it’s important enough to be, and should be preserved, not developed.

Response 46.6: No decision has been made by the Town regarding future use(s) at the former Rockland County Day School property. It should be noted that significant portion of this property is built out with existing structures and cleared fields.

Comment 46.7 – (David Ramirez, June 22, 2021): I understand that the answers to public comments will be provided in the Final Plan Update to be approved by the Town Board. Why is the public not being given the courtesy of responses in the draft form of the Plan? This is not giving anyone an opportunity to have a discourse about responses the Town gives. I urge the Town to allow the public a chance to view the Town’s responses to their comments with a second chance to comment before the Town Board’s final vote on approving the Comprehensive Plan.

Response 46.7: The Town received over 750 comments during the public outreach process for the update of the Comprehensive Plan; each of these comments was addressed (see Appendix Section II). Upon drafting the update, the draft goals and objectives were then presented to the public, and the comment period left open for an additional period of time. In responding to each and every comment on the Draft Comprehensive Plan Update and DGEIS in this FGEIS, the Town is following the procedures mandated by law under the State Environmental Quality

Review Act (SEQRA). The Town Board will afford agencies and the public a time period not less than 10 calendar days in which to consider the FGEIS before issuing its written findings statement.

Appendix

Please note: Appendix Sections I-IX are bound separately and available for download at the Town's Comprehensive Plan Update website at compplan2020.clarkstown.org/public-participation or for viewing at Town Hall in the office of the Planning Department. Upon adoption of the Comprehensive Plan Update, the Appendix will also be available through the Planning Department page of the Town's website (town.clarkstown.ny.us/town_hall/planning).

I. Summary of Progress on Goals & Objectives of the 2009 Comprehensive Plan

II. Public Comments on Preparation of the Draft Comprehensive Plan Update/DGEIS

III. Presentation on Summary of Changes Proposed within the Draft Comprehensive Plan Update/DGEIS

IV. Surveys

A. Student Community Survey – Town of Clarkstown - 2008

B. Clarkstown Housing Needs Survey – GMRS – October, 2008

V. Studies

A. Town of Clarkstown Economic Development Strategy - Saratoga Associates - November, 2008

B. Environmental Resource Assessment – John Mickelson – November, 2008

- C. Final Report - Citizens Advisory Board for Housing in the Town of Clarkstown – September, 2002*
- D. Recreation & Parks Master Plan – C.T. Male Associates - October, 2008*
- E. Town of Clarkstown Open Space Guidelines - Minutes of the Planning Board Meeting of March 22, 2000*
- F. Priority Recommendations of the Clarkstown Open Space Citizen's Advisory Committee – June 22, 2001*
- G. Report: Staff Advisory Committee on Clarkstown Open Space Acquisition – January 12, 2006*
- H. Clarkstown Comprehensive Transportation Plan - Cambridge Systematics, Inc. with The RBA Group and Howard/Stein-Hudson Associates - July, 2009*
- I. New City Hamlet Center Vision Plan – Behan Planning Associates, LLC with Frederick P. Clark Associates, Inc. – February, 2007*
- J. Congers Lake Road Ad Hoc Committee Recommendations – June 20, 2007*
- K. Comments on Congers and Valley Cottage Overlay Districts Memo – Jay A. Greenwell, PLS – March 28, 2009*
- L. Partnerships & Connections: Town of Clarkstown Commercial Corridor Transportation & Land Use Study - Cambridge Systematics, Inc. – 2015*
- M. NY Rising Community Reconstruction Plan - 2014*
- N. Complete Streets Committee Project Selection and Implementation Guide & Street Ranking Documentation - AKRF Consultants - 2017*
- O. Hamlet of Nanuet Transit Oriented Development Plan - Cambridge Systematics, Inc. – Final Report - 2017*

P. Clarkstown Geographic Information Systems Strategic Plan 2020-2025 - William Withington, Clarkstown GIS Coordinator - 2020

Q. Clarkstown Business & Economic Development Advisory Committee Report - 2019

R. 2021 Clarkstown Climate Action Plan – Joshua D. Rotbert - 2021

S. Covid-19 and NYC Metro Region Residential Sales Trends – 2021

T. Professional Complete Report, Clarkstown, NY – EASI Demographics - 2021

VI. Town Board Resolutions

VII. Scoping Document

VIII. Public Hearing Minutes of Town Board Meeting on the Draft Comprehensive Plan Update/DGEIS

IX. Correspondence on the Draft Comprehensive Plan Update/DGEIS