

GREENPLAN

Monday, April 20, 2020

Honorable Neil Dwyer, Mayor
Village of Monroe Board of Trustees
7 Stage Road
Monroe, New York 10950
Sent Electronically to mayor.dwyer@villageofmonroe.org

GREENPLAN INC.
Professional Planners
302 Pells Road
Rhinebeck, NY 12572-3354
845.876.5775
JTFink@greenplan.org

Re.: *Town of Monroe Proposed Conservation Cluster Residential Floating Zone Amendment
Review Comments on Town's Draft Generic Environmental Impact Statement*

Dear Mayor Dwyer and Village Board Members:

As requested by the Village Board, the Draft Generic Environmental Impact Statement (DGEIS) for the above captioned Town of Monroe sponsored Zoning Amendments (the action), prepared by Nelson, Pope & Voorhis, LLC as consultants to the Town Board, was reviewed by GREENPLAN during the public comment phase of the Town's State Environmental Quality Review (SEQR) process. The Town's Public Hearing on the DGEIS occurred on March 25, 2020 and the public comment period was extended until April 20, 2020. Public comment was originally set close on April 6, 2020.

All DGEIS review comments become the basis for the Town Board's Final Generic Environmental Impact Statement (FGEIS) on the action. The Town's FGEIS will also consist of the DGEIS (usually by reference), the substantive comments on the DGEIS together with appropriate responses to all of the substantive comments, and corrections and/or revisions to the DGEIS (if any) that are called for based upon the comments the Town receives.

This technical review letter will outline areas of the DGEIS where, in my professional opinion, clarification, revisions, and/or supplementation should be provided by the Town of Monroe in the FGEIS. In preparing these comments for the Village Board of Trustees (Village Board), I previously reviewed several other documents as part of the SEQR process by the Town Board of the Town of Monroe (Town Board). The documents are as follows:

1. The Town Board's proposed Zoning Amendments Local Law (Town Zoning).
2. Positive Declaration: Notice of Intent to Prepare a Draft EIS Determination of Significance dated September 23, 2019. According to the Positive Declaration, written comments on the Draft Scope will be accepted by the Town of Monroe until October 25, 2019.
3. "Town of Monroe Final Scope for Preparation of a Draft Generic Environmental Impact Statement for the Proposed Conservation Residential Cluster Floating Zone" (Final Scope).
4. I have also reviewed other relevant documents related to the preparation of the Draft Generic Environmental Impact Statement (DGEIS) and the proposed Town Zoning Amendments. These include the Village of Monroe Comprehensive Plan (online at <http://villageofmonroe.org/compplan.html>), Village of Monroe Zoning Law (online at <https://www.ecode360.com/7235050>), Town of Monroe Comprehensive Plan (online at <https://www.monroeny.org/index.php/doc-center/>)

[comprehensive-plan](https://www.ecode360.com/6417282)), and Town of Monroe Zoning Law (online at <https://www.ecode360.com/6417282>).

By education and experience, I am familiar with the State Environmental Quality Review Act, the Planning and Zoning enabling acts of New York State Village and Town laws, Municipal Home Rule Law, and many others. I have reviewed other pertinent documents that relate to the proposed zoning action as the basis for my review of the DGEIS. My qualifications for providing comments on the DGEIS are as follows. I am a certified professional planner who has worked at the Federal, State and local levels on community and environmental planning projects, including comprehensive plans and zoning laws, for four decades. I have worked on SEQR projects for as long, including training municipal legislative, planning and zoning boards on SEQR, and have personally prepared or reviewed thousands of SEQR environmental impact assessment documents. This has included the SEQR review of mega-projects like the Sterling Forest Development, where I was a SEQR consultant to the New York State Department of Environmental Conservation (DEC), Federal NEPA reviews like the Millennium Pipeline, SEQR reviews of hundreds of proposed real estate development projects, and SEQR reviews of scores of municipal planning and zoning actions. I also teach “Principles of Environmental Assessment” (ENSC 380) at Marist College’s School of Science.

In my professional opinion, the comments that follow identify environmental issues that merit inclusion in the FGEIS, which I understand is being prepared as of this writing:

General Comments on the DGEIS and the Action

The Village Board of Trustees should note in the DGEIS Description of the Proposed Action, that creation of a CCR Floating Zoning District in the Town: *“Will allow for a procedure whereby applicants may petition the Town Board for a map amendment to allow a residential cluster subdivision providing a variety of housing options at gross densities consistent with lowest densities permitted in the Town’s Village’s, so long as most (65%) of the property is preserved as open space.”* On its face, this appears to be a laudable goal of the Town’s Zoning Amendment process. However, introduction of village-scale higher density development in the more rural Town could come with consequences.

Further, while the 65% open space minimum requirement may sound as if it is reasonable and protective of the environment, whether it truly minimizes adverse impacts on the environment is debatable. For example, the Sterling Forest Development Master Plan, proposed in the 1980’s and 1990’s in the Town of Monroe, Warwick and Tuxedo called for a minimum 82 percent open space to be preserved even in a more rugged and environmentally sensitive location of the Town. Sterling Forest also called for 13,500 housing units and eight million square feet of commercial development with generous recreational amenities. In the Town of Rhinebeck in Dutchess County, the Town requires a minimum of 80 % open space in cluster developments within certain zoning districts. Clustering in Rhinebeck is also considered a permitted use with conventional subdivision a special use subject to additional special conditions if clustering is not chosen by a developer.

If planned properly, a development with 65% open space can help to preserve natural and cultural resources in the less densely settled Town. However, it may also direct growth away from existing settled areas when suitable conditions exist, and may also increase vehicle trips in both the Town and Village if walkable neighborhoods and public transit are not also nearby and included in the development applications to come. This action may increase greenhouse gas emissions if it is not also paired with proximity to sidewalks in the Village and other Town locations where they are available. The key point is whether the action is planned properly. While the DGEIS examined seven parcels in the Town that are

generally located along the south side of Rye Hill Road and adjoining the Village boundary that have been proposed for testing a “Reasonable Worst Case Development Scenario” (RWCDS) of the Conservation Cluster Residential Floating Zone (CCR) proposal, other locations in the Town may be subject to the CCR provisions in the future and could increase traffic congestion within the Village above any beyond what has been disclosed in the DGEIS.

On page 3-3 of the DGEIS, the Town acknowledges that development under the proposed CCR Zoning Amendments would almost double vehicle trips over the existing RR-1 Zoning in effect on the seven parcels. While traffic mitigation for this increase is discussed in the DGEIS and appears to be negligible, the Town has attempted to further minimize impacts on traffic by requiring that Zoning petitions be limited to sites located within one-half mile of either of the two villages in the Town. While this may reduce traffic congestion, unless it is paired with pedestrian and bicycle infrastructure between any CCR development and one of the two villages, new residents will have no other options to use alternatives to their own vehicles to travel to a village to shop, go to school, recreate, and work. In my opinion, the CCR proposal would be substantially improved by explicitly expanding the criteria stated on pages 1-19 and 5-1 of the DGEIS. The current proposal includes “Provision of sidewalks” as an advisory element in the Zoning decision-making process of the Town Board. In my opinion, the advisory element would only reduce the burden on local roads and intersections if it were strengthened in two ways. One, make the advisory element a requirement. The second would be to reword the criteria as follows:

- **Existing Advisory Element:** There are adequate public facilities to serve the proposed development
- **Proposed Mandatory Element:** There are adequate public facilities to serve the proposed development including existing or planned pedestrian and bicycle infrastructure to serve the proposed development

The DGEIS discloses that the proposed CCR, as applied to the seven parcels (i.e. the RWCDS) in the Town, could result in an additional 491 dwelling units with a floor area of 660,000 square feet. The 491 dwelling units could result in a projected 1,094 bedrooms with 1,271 new residents including 258 new school children. The DGEIS also notes that any future petitioner for a CCR Zoning Map amendment may seek an interconnection agreement to the Village water system and that such an arrangement would require an out-of-service agreement with the Village requiring Village Board approval. The DGEIS also addresses the potential for development of a proposed on-site sanitary sewer system that could connect with existing offsite infrastructure owned by the Town of Monroe. This arrangement would not require Village Board approval but would require Town approval. The possibility that the Village’s sewer system would interconnect with an onsite sewer system is left open and if it were proposed, would also require approval from the Village Board. Both water and sewer approvals require approvals from the Orange County Health Department.

In other respects, there are trade offs in the proposed CCR Amendments and the key environmental indicators used in the DGEIS all flow from a set of assumptions about the existing build-out of the site versus a projected build-out of the site under the CCR Zoning amendments. While the number of units that could be achieved under the existing Zoning versus the proposed Zoning is significant; 172 single family units under existing Zoning versus

	Test Case (CCR Floating Zone)	Alternative (RR-1 Zone)	Change
Number of units	491	172	+319
Number of bedrooms	1,094	860	+234
Total Gross Floor Area (SF)	660,000	774,000	-114,000
Impervious Coverage (Acres)	20.7	58.1	-37.4
Preserved Open Space (Acres)	159.8	30.9	+128.9
Population	1,271	777	+494
Schoolchildren	258	272	-14
Peak AM traffic (trip ends)	207	127	+80
Peak PM traffic (trip ends)	244	132	+112
Water usage by bedroom (gpd)	139,785	85,470	+54,315

491 units under the proposed CCR Zoning Amendments. However, the assumption used to calculate gross floor area of the projected 491 dwelling units may be less under the proposed CCR Amendments, impervious coverage may be greater under the existing Zoning and school-aged children under the existing Zoning may be greater even though a future CCR development may result in a greater number of units and the total population of the CCR development would be greater. Water use would be greater under the CCR Zoning than existing and traffic can be expected to be almost double what a single-family development would generate. The adverse impacts on municipal finances in the Town and for the School District are expected to be greater for the CCR Zoning than existing Zoning, but the effects on Village finances is an unknown, since the DGEIS does not address fiscal effects on the Village even though this was requested to be in the Final Scoping Document. A summary of anticipated characteristics of the CCR test case against the existing RR-1 Zoning can be seen in the table above.

The proposed Town Zoning discusses goals for protection of the natural environment on parcels deemed eligible for the CCR Floating District designation and such other matters as overall density, central water and sewer services, providing a mix of housing types, and preserving open space. What is missing from the proposed Local Law are other important planning issues, such as siting developments where access to walkable neighborhoods is available so that new residents are not required to drive into the villages for services. Related to availability of a pedestrian and bicycle network is any kind of requirement for the new development, that would be encouraged to locate in the CCR Floating District, to have sidewalks as both an internal and external feature of the development.

A general comment on the DGEIS is that a full SEQR impact thresholds document should be created by the Town Board in the FGEIS. The Village Board should strongly encourage the Town to provide in the FGEIS document a clear summary document (that can be used outside of the voluminous DGEIS and FGEIS documents) of all SEQR thresholds applicable to new site-specific developments proposed under the CCR Zoning. The DGEIS discusses thresholds on page 1-18 and provides a list of 10 thresholds on page 5-1. But a clear summary document that can be used as a reference for all applications and affected jurisdictions under the assumed new CCR Zoning would be a useful addition to the SEQR process.

The thresholds would be in a preferable tabular format and they would clearly identify when and how such applications would trigger the need for supplemental SEQR documentation to ensure that environmental impacts that remain undisclosed in the DGEIS and how they are properly addressed prior to consideration of the merits of new petitions. The tabular format would also allow for a comparison to be inserted with any application that is proposed so that an assessment of key impact thresholds can be visualized readily. For example, water supply from the Village may be requested in conjunction with a petition for a CCR Map Amendment in the future. Having in hand an explicit summary document that outlines the SEQR thresholds and compares them with the proposed development under the Zoning petition would create efficiencies in both the Town and Village of Monroe.

Establishment of clear thresholds permits a more efficient dialogue between involved agencies on projects as they evolve through the municipal and other government application and review processes and allows for adjustments to be made as conditions change. Timing and phasing of the new development as well as monitoring of the mitigation measures imposed on new development could also be achieved more efficiently with a clearly constructed CCR SEQR thresholds document. The following specific comments are identified by the page number (or section number) where the statement and/or impact assessment discussion first appears in the DGEIS.

Specific Comments on the DGEIS:

Page(s)	Comment
1-4 & 1-5	The DGEIS assumes that water supply to the RWCDs parcels adjoining the Village of Monroe, would be provided through a Town of Monroe Water District (High Ridge) or an extension to the Water District. If those assumptions prove to be unworkable, then under future development in the seven RWCDs parcels, water would be supplied through groundwater wells developed on the site. The DGEIS projects that groundwater available on the site is sufficient to support the required water withdrawals.
1-5 & 1-6	The DGEIS assesses impacts on ecology on the seven parcels, based upon information provided by the New York State Natural Heritage Program (NHP) and a site inspection performed in late December 2019. The NHP program provides its data based upon known records of species of concern in its database. Assuming the CCR Zoning Amendments are enacted, any future development applications filed with the Town in conjunction with a CCR petition should be accompanied by a timely habitat assessment on the site performed during the appropriate months by a qualified ecologist. For instance, on page 2-26 of the DGEIS, it states that: “No rare, threatened or endangered plants were observed on site” but this apparently was based upon a site inspection on December 27th, when plant species and most wildlife species would not have been apparent. Further, habitat assessments prepared for any future applicant for CCR approval needs to be properly verified by an ecologist for the Town of Monroe. This should be included in the criteria to be applied to all future applications. The impacts on ecology were also discussed in Section 2.3 starting on page 2-12 of the DGEIS.
1-23	The DGEIS discusses public need and benefits of the proposed CCR Zoning Amendments to the Town of Monroe, based primarily on the goals and objectives of the Town Comprehensive Plan and Orange County Plan. My comments on the Draft Scoping Document requested that the public need and benefits should also be discussed in relation to the Village of Monroe, since the Village may be called upon to provide water and sewer services. The Village is also likely to face traffic and a host of other potential impacts on its infrastructure. However, public need and benefits for the Village is absent from the DGEIS. I recommend that an assessment of the public need and benefits to the Village be included in the FGEIS.
1-28	The DGEIS acknowledges that future petitioners for a CCR Zoning Amendment may: “Seek interconnection to Village water and sewer systems, [and] this will require out-of-service agreements with those municipalities.” As a result, my previous comments on the Draft Scoping Document dated 10/23/2020 requested that the Village Comprehensive Plan be examined to determine whether there were any potential impacts on Village policies that could be affected by such a scenario. However, the DGEIS does not discuss policies of the Village Comprehensive Plan that would be affected by a proposed CCR development of the site if it were to rely on Village water and sewer systems. In my opinion, this should be provided in the FGEIS.

- 2-9 The DGEIS states that: “*The current proposed layout of the Test Case Site minimizes any impacts on wetland and wetland buffer areas and no significant impacts are anticipated.*” This statement assumes that only direct impacts on wetlands and wetland buffers may occur. All forms of development have the potential to also create indirect impacts to wetlands and these should be included in the thresholds established for future development. For example, changes in the hydrologic regime on a site are critical in determining the potential for wetland impacts. However, wetlands analysis is not always considered separately from other stormwater issues in a Stormwater Pollution Prevention Plan (SWPPP). Further, sedimentation from clearing and grading activities can affect surface water quality beyond wetland buffer areas as can application of pesticides, which are not normally removed through even the most rigorous SWPPP. The SEQR thresholds to be applied to future site-specific development should include hydrologic (water quantity) and chemical (water quality) analysis of stormwater specifically associated with wetland impacts.
- 2-10 The DGEIS assumes that water supply for future development on the site will be split between an “Eastern” parcel and a “Western” parcel. The Eastern parcel is located southwest of the Prestwick Drive area while the Western parcel is located southeast of the Rye Hill Road area. The Western parcel falls within a water district within the Town of Monroe and it is likely that potable water would be provided through this Town District. As stated in the DGEIS on page 1-10, it states that: “*The western parcel would be served by the existing domestic water system infrastructure owned and operated by the Village of Monroe.*” Water use required to support the Western parcel, according to the DGEIS, is not expected to impact the groundwater demand of the RWCDS. The Eastern parcel would require the installation of drinking wells unless it is able to successfully petition for extension of the water district to this parcel area. If this parcel is unable to connect to a public water supply district, then the Eastern parcel could be served by individual wells and central sewer, assuming that Town, County and State approvals for the action could be approved. The DGEIS does discuss a scenario where a Zoning petitioner for the CCR Floating District could apply for interconnection with Village water and sewer systems but it also acknowledges that this would require an out-of-service agreement with the Village.
- 2-30 The Village Comprehensive Plan was not subjected to an analysis of the potential impacts on the Village Zoning nor Comprehensive Plan, although this was requested in the comments on the Draft Scoping Document. Since both the Village’s land use and Zoning may be affected by the change in the Town’s Zoning, an analysis of this should be included in the FGEIS.
- Section 2.4 of the DGEIS discusses the potential impacts of the RWCDS on land use, zoning, and plans. The predominant land uses, that are assumed under the RWCDS, are residential in the form of townhouses, patio homes, apartments and senior apartments. The proposed CCR Zoning Amendments will also allow non-residential development in the form of hotels, spa and conference facilities, restaurants, personal service establishments and retail (integrated into recreation and other accessory non-residential structures). The CCR will also permit assisted living facilities and multi-family residences. It should be noted for the Village Board that none of the non-residential uses nor the high

density multi-family or assisted living facilities were included in the calculations of impacts in the form of traffic, water and sewer, nor fiscal effects.

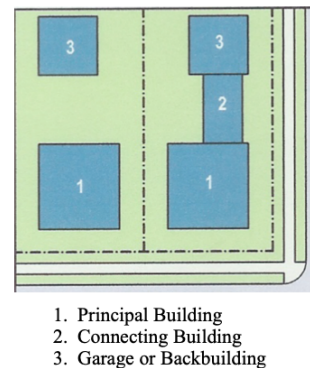
In terms of the Village's 2014 Comprehensive Plan, it states clearly that Village policy \ E.1.6.2 is for: "Reasonable additional residential density at densities of less than 12 units per acre (moderate density) and focused in areas of the Village with vehicular access and public water and sewer is likely the policy that will be least impactful of the environment and most consistent with existing Village character. Higher densities would not be consistent with the existing Village character and failing to allow future growth within the Village would encourage greenfield development in surrounding rural areas more appropriate for conservation use." The FGEIS should address any potential impacts of the CCR Amendments on the Village's water and sewer in light of the Village policy discouraging higher densities in rural areas outside of the Village boundaries and encouraging conservation uses. If any of the types of developments that are permitted in the CCR is proposed and such impacts were not included in the RWCDS, then a Supplemental EIS should be mandatory.

- 2-37 The CCR Zoning amendments include a requirement for minimum open space and parkland. However, the DGEIS is silent on whether any lands designated as "parkland" could be open to the public in the future or if it would be reserved solely for the new residents of any developments approved under the CCR. The FGEIS should discuss this potential. If development on the RWCDS site is pursued in the future under the CCR, protected open space on the site could provide a benefit to Village residents if such parkland was open generally to Village residents.
- 2-48 The DGEIS projects the municipal costs and revenues of the RWCDS scenario versus an as-of-right single family development of the seven parcel site. Annual impacts of the RWCDS are projected to be a **minus \$555,995**. Annual impacts of the as-of-right single family development are projected to be a **minus \$231,628**. Both types of development then would impact the budgets of the Town and School District, with the RWCDS resulting in an impact that is more than double the impacts of the existing Zoning for the Town site (i.e. RWCDS). In general, most forms of residential development result in a fiscal impact greater than non-residential development, so that is expected. Based upon the analysis provided, it remains unknown how any development of the site would affect Village taxpayers regardless of the development scenario. My previous comments on the Draft Scoping Document requested that: "*The fiscal impacts to both the Town and Village should be discussed in the DGEIS...*" [emphasis added]. However, the DGEIS did not attempt to assess such impacts. In my opinion, the FGEIS should assess fiscal impacts of the site development upon the Village.
- 2-62 The DGEIS states that: "*Future residents would be able to take advantage of both transportation systems and as a result use of these systems would reduce their daily greenhouse gas emissions.*" However, the DGEIS does not address the potential greenhouse gas emissions from traffic generated in the future by developments proposed for the CCR Zoning. This should be included in the FGEIS. The rationale includes a number of sources. One is New York State's Guide for Assessing Energy Use and Greenhouse Gas Emissions in an Environmental Impact Statement, which has been a recommended practice for more than 10 years now. It applies when, "*as a result of scoping*" [see Guide] should be included in an EIS. My comments on the Draft Scoping Document requested that it be included in the

DGEIS, but it was not. Further, in the 2019 New York Legislative Session, the New York State Climate Leadership and Community Protection Act was enacted and signed into law. According to the Act: *“Climate change is adversely affecting well-being, public health, natural resources, and the environment of New York...The severity of current climate change and the threat of additional and more severe change will be affected by the actions undertaken by New York and other jurisdictions to reduce greenhouse gas emissions...Action undertaken by New York to reduce greenhouse emissions will have an impact on global greenhouse gas emissions and the rate of climate change. In addition, such action will encourage other jurisdictions to implement complementary greenhouse gas reduction strategies and provide an example of how such strategies can be implemented. It will also advance the development of green technologies and sustainable practices within the private sector, which can have far-reaching impacts such as a reduction in the cost of renewable energy components, and the creation of jobs and tax revenues in New York. It shall therefore be a goal of the state of New York to reduce greenhouse gas emissions from all anthropogenic sources 100% over 1990 levels by the year 2050, with an incremental target of at least a 40 percent reduction in climate pollution by the year 2030.”* [emphasis added]. Every new development henceforward should be weighed on the basis of how it will comply with New York State’s goals. It is highly recommended that the FGEIS address, in a concerted manner, what steps the Town of Monroe will take to ensure that new development within its borders will not adversely affect well-being, public health, natural resources, and the environment by requiring an evaluation of a project’s greenhouse gas emissions in addition to other requirements.

2-70

The DGEIS presents the results of an assessment of the impacts on cultural resources including visual impacts and historic and archaeological resources. The CCR provisions emphasize a need to avoid traffic impacts and to generally encourage future development, subject to the terms of the CCR provisions, to be pedestrian friendly. In this vein, the CCR would require the Town Board to consider: *“Avoidance of front-loaded garages.”* It is suggested that the design standards to be imposed on new development not just “avoid” front-loaded garages but prohibit them entirely by adding a graphic criterion with an illustration and text such as the following: *“All garages shall be located on lots as illustrated in...”* for example, a figure similar to that provided here.



The DGEIS states that any application for CCR and site development would need to demonstrate that the plan meets design standards with details provided on a variety of elements like lighting, landscaping, architecture, site development, street design and layout, signage and so on. It is suggested that design standards work best when an applicant can visualize their proposed development in accord with illustrated standards and the Planning Board can judge the extent to which the design standards are followed by including specific graphic illustrations of desired design outcomes. Graphic-based design standards should be prepared as part of the CCR Zoning Amendments to serve as a guide for future construction so that Monroe’s unique character can be retained and enhanced. They can be used for construction of new buildings and alteration and expansion of existing ones to

ensure that new development fits into the neighborhood and adds to the Village and Town's community character.

The Town Board will also be responsible for considering an advisory element that states simply: "*Provision of sidewalks.*" It is suggested that the provision of sidewalks be mandatory and be extended to include provision of bicycle amenities to provide for alternatives to motor vehicle use as much as possible by the new inhabitants and to reduce traffic congestion within the Village and Town and greenhouse gas emissions in the atmosphere.

- 2-71 Proposed mitigation for potential impacts on visual character includes a number of specific bulk requirements. However, missing from the mitigation measures are buffers sufficient to provide an appropriate distance between existing single family development in the surrounding area including the Village and what could be higher density residential like townhouses, multi-family, assisted living and non-residential uses like hotels, restaurants, and spas in a CCR development. An additional bulk requirement in the form of minimum buffers to existing uses should be included in the final CCR requirements.
- 3-2 The comparison of impacts under the No-Action alternative with an alternative under the existing Zoning omits an important role that generic environmental impact statements are to achieve. That is to develop a realistic range of possible development scenarios. The DGEIS includes a number of assumptions that a single-family development of the site would adhere to. What is missing is a realistic examination of a more environmentally benign cluster development of the site that results in greater open space protection through, for instance, smaller dwelling units among other factors. The assumption for single-family housing development of the site assumes that all single-family construction would result in 4,000 to 5,000 square foot five bedroom homes. This is approximately double the average size of single family homes in the US, which have been on the decline.¹ In 2018, the median size of a completed single-family house was 2,386 square feet according to the US Census Bureau. In addition, imposition of maximum square footage on new single-family homes is an additional bulk requirement that could be imposed on the approval of a CCR project to reduce environmental impacts to the greatest extent practicable, as stated in the DGEIS, if it were to be added to the list of other requirements. The DGEIS in a number of places states that environmental impacts have been mitigated to the maximum extent practicable. However, in this case, the Town could further pursue development scenarios in line with more current trends even further.
- 4-3 The DGEIS states that energy use, specifically fossil fuel use, would increase as a result of the proposed CCR Amendments. It is also assumed that energy use would increase in the Town under the existing Zoning and it may be argued that such energy use may be greater with single family homes under the RR-1 Zoning than the CCR due to an expected larger gross floor area. Nevertheless, the Zoning Amendments, needed to establish the CCR, as well as the future Zoning petitions and approvals of such Zoning changes expected if the CCR is adopted, present an opportunity to require zero energy homes for the future dwelling units. There are numerous examples of zero energy homes in the Hudson Valley,

¹ "*The sprawling, suburban homes that Baby Boomers coveted will increasingly become a relic of the past in 2020 and into the next decade as the median square footage of newly built, single-family homes will fall for the fourth time in five years,*" according to Zillow.com.

New York State, and other Northeastern states so they are feasible to provide in the Town of Monroe.

Any new development of a green field site will be around for 100 years or more. As a result, supplying 491 dwelling units with gas heating as discussed in the DGEIS is a commitment toward continued use of finite fossil fuels, thereby creating additional global warming potential. The Federal government has projected a rise in temperatures, by 2100, of 6.27 °F over present average (global mean surface) temperatures if present trends continue.

According to the Federal government, present trends are also a commitment towards further global sea level rise over what has already occurred in the past 150 years. This has been projected by the Federal government as leading to a global mean sea level rise of up to 8.9 feet by 2100. Committing to use of gas heating under the Federal government's projections of increasing anthropogenic greenhouse gas emissions would increase the risks posed by greater warming and sea-level rise.² This should be further addressed in the FGEIS

- 5-1 The 10 thresholds provided in the concluding section of the DGEIS should be expanded to address the recommendations provided above.

The above comments are made in consideration of the Village of Monroe's need for information relevant to the growth and character of the Village. Any comments of the Mayor or Village Trustees on the DGEIS should also be transmitted to the Town of Monroe as part of the DGEIS review process with a request that the comments be included in a FGEIS to be published.

I note that the Village has now been included as an Interested Agency under SEQR with copies of all documents produced for the Town Zoning process to be transmitted to the Village Board in the future. The Village should carefully monitor for incoming correspondence from the Town on this action since SEQR deadlines and filing requirements can be short. For example, once the Town's FGEIS is released to the public, there is only a 10 day minimum time period for public consideration of the FGEIS document before the SEQR Process concludes with adoption of a Findings Statement by the Town Board.

In addition, Village Board members may not personally receive the documents as soon as they arrive due to delays with current Town and Village hall closures, the need for social distancing, and prevention of virus contamination from paper products. The Village Board may want to consider requesting that the Town Board provide more than the required minimum SEQR time frames for the FGEIS document, which is customary.

Very Truly Yours,

J.Theodore Fink, AICP
President

Cc: Alyse Terhune, Esq.

² All figures provided in the above paragraph are from The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Year 2021–2026 Passenger Cars and Light Trucks Draft Environmental Impact Statement dated July 2018, Docket No. NHTSA-2017-0069. US Department of Transportation and National Highway Traffic Safety Administration, with EPA and DOE.