



MEMORANDUM

TO: Howard Post, Planning Board Chair
Members, Saugerties Planning Board

FROM: Adriana Beltrani, AICP
Dylan Tuttle

RE: Solo Holidays LLC Subdivision
Cottontail Lane and NYS Rt 212

DATE: April 16, 2026

CC: Becky Bertorelli, Planning Board Clerk

We are in receipt of the following items:

- Subdivision sketch plan, prepared by Praetorius and Conrad, P.C. dated April 7, 2026.
- Cover letter by Praetorius and Conrad dated April 7, 2026
- NYSDEC Negative Jurisdictional Determinations dated September 12, 2025
- Long EAF by Praetorius and Conrad dated October 22, 2025

The applicant, Solo Holidays LLC is proposing a 9-lot subdivision on a 75.3 acre property off of Cottontail Lane and NYS Rt. 212, on SBL 27.2-8-28 & 32.110 in the Moderate Density Residential (MDR) Zoning District and partially within the Gateway Overlay District.

This site was previously approved for a 21-lot subdivision though these approvals are now expired. A “glamping” resort (“Terramor”) was proposed for the site between 2022-2023. It was reviewed by the Board but never approved.

New comments are in **bold**. Older comments that remain relevant are underlined.

The applicant’s cover letter addresses several issues raised in our prior memo, but leaves others unaddressed. We request that in future submissions, the applicant respond to each memo comment in order.

Application Status

1. **Summary. This is the applicant’s third submission. Since our first review, changes have been made to the access point and road layout. NYSDEC negative jurisdictional determinations have been received for both properties. The applicant states that water testing has been conducted and that they have corresponded with NYSDOT about the proposed access. The applicant has also officially purchased the property. The application remains in the preliminary plat approval stage.**
2. **Procedural items. A public hearing was opened at the November 18, 2025 meeting and adjourned to April. Referral to the Ulster County Planning Board will be required for the subdivision once a complete preliminary plat is submitted.**

3. **SEQR. A Notice of Intent was distributed after the November 18, 2025 meeting. No objections were received and the Board may assume Lead Agency status. A LEAF Part 2 is included with this memo for the Board's review and consideration.**
4. **Wetlands. The applicant has received negative JDs for both properties from NYSDEC. They state that they have initiated the wetland permitting process with US ACOE and are proposing enhancement/creation of wetlands elsewhere on the site as a mitigation. A sheet depicting wetland mitigations is included in the submission. We provide comments relative to wetlands below.**

Zoning/Subdivision Code Review

1. Subdivision Contents. Per §215-27, the following should be provided unless waived by the Planning Board:
 - a. Rock outcroppings occurring on the site within the area of disturbance should be shown;
 - b. The amount of land disturbance in acres planned for the tract must be provided;
 - c. Lot dimensions should be provided;
 - d. Proposed covenants, deed restrictions, easements, proposed by the applicant;
 - e. Statements from subdivider's engineer giving estimated cost of construction of roads and other improvements to meet the requirements of this chapter, together with quantities and unit costs used in making the estimate;
 - f. The location, width, grade names of all proposed streets with elevations shown at the beginning and the end of each street, at street intersections, at all points where there is a decided change in slope or direction shown on the plat.
 - g. The location of existing and proposed sewers, water mains, culverts, and storm drains, including pipe size and type, grades, direction of flow, ownership.
 - h. The area of the land included in the subdivision and the approximate location, dimensions, and area of all proposed or existing lots and land to be set aside for recreation and public purposes. The suggested location of buildings on lots will also be shown. All lots shall be numbered.
 - i. Proposed provision of water supply, fire protection, sanitary waste disposal, stormwater drainage, street trees, streetlighting, fixtures, signs, sidewalks, and easements.

4/26 – Comment remains, the applicant must address each of these or request waivers.

2. §245-23, Conservation Subdivisions. The applicant is not required to apply for a conservation subdivision as only eight lots are proposed, however, the applicant may benefit from the conservation subdivision process for the following reasons:
 - a. The applicant is entitled to the number of units that can be constructed on the site pursuant to B(1) density calculation;
 - b. These units can be constructed as one or two family homes, and no minimum lot size is required in a conservation subdivision;
 - c. Considering these two points, a subdivision yielding similar economic return may be possible with less impact to wetlands and steep slopes, and possibly a shorter roadway. We note that 6 NYCRR 663.5(e), Standards for Permit Issuance, emphasize the consideration of practical alternatives for meeting the applicant's objectives, for which a conservation subdivision may qualify. **4/26 – Comment remains. Applicant continues to propose a standard subdivision. The Board and applicant could discuss whether a conservation subdivision would be feasible and**

appropriate on this site.

3. **4/26 – The applicant is now proposing a Private Rural Road. PRRs are regulated in the Town under §215-19. The following standards are not met:**
 - a. Per §215-19A(1), “The boundary of each lot served by a private rural road shall extend to the center line of the road, with the right-of-way for ingress and egress over the road granted to each lot served by such road.”
 - b. Per §215-19A(3), “Written comment from the Town Highway Superintendent shall be secured before approval of any private rural road.” Per §215-19B(1), “All construction shall be in accordance with these regulations and shall be under the immediate inspection, supervision and approval of the Town Highway Superintendent or the Town Engineer.” We suggest the plans be forwarded to the Town Engineer or Highway Superintendent for review and approval.
 - c. The applicant proposed a road maintenance agreement for upkeep. Per §215-19A(5), “The Planning Board may waive the requirement of HOA ownership of a private rural road if it finds, after consulting with the Town Attorney, that a recorded maintenance agreement, executed by the applicant as a condition of subdivision approval, will provide sufficient protections to lot owners and the Town and that all of the requirements and HOA functions will be properly fulfilled by such maintenance agreement.
 - d. Per §215-19A(8), “The subdivision plat shall show the road clearly labeled ‘private rural road’.”
 - e. Per §195-19B(9), “The maximum length of the common portion of any private rural road shall be 1,200 feet from the access road unless there are two points of access.”
4. §215-23.A, Parks and Open Space. The Planning Board may charge a fee in lieu of land for recreational purposes, or may require a reservation of land for park and recreational purposes to be reserved on the Plat. In general, such reservations should have an area of at least two acres and have adequate street access. It may be appropriate to reserve land on Lot 1 (16.2 acres) for passive recreation/trails, given the proximity of the site to neighboring residences. Lot 4 may also offer recreational opportunity with pedestrian access between lots 2 and 3- though this may not be considered “adequate street access.” **4/26 – Comment remains, although the lot numbering identified in the original comment is no longer relevant. In deciding whether parks can be suitably located within the subdivision, the Planning Board may wish to ask the applicant’s preference to reserve parkland or pay the money-in-lieu of land. If the Planning Board feels that parkland may be appropriate in this area, the Planning Board may wish to consult with the Town Board as well, to verify that the Town will accept dedication of the parkland.**
5. NYS Fire Code (NY 511.2.3 Turnouts) requires driveways in excess of 500 feet in length and less than 20 feet in width to provide turnouts along the driveway. This appears to apply to Lots 4 and 7. **4/26 – Comment addressed, a turnout has been added to the lot 7 driveway. All others are less than 500 feet.**
6. §215-24, Drainage improvements, will apply. We defer to the Town Engineer to opine on drainage adequacy. **4/26 – Comment remains.**
7. While the site is within the Gateway Overlay, new homes will likely not be visible from the road. New lighting should be required to be International Dark Sky compliant. **4/26 – Comment remains.**

Planning

1. Rock Wall Preservation. The proposed roadway passes through a notable rock wall on the property (see image below). These walls are remnants of the historic use of the site, and highlight the history of quarrying and dry stone walling in Saugerties and should be preserved and enhanced as a cultural feature. Lot 6 shows septic and reserve areas disturbing these rock walls, and we encourage the Planning Board and Applicant to consider alternative locations for the septic if feasible, or ways to otherwise preserve the rock walls, potentially as a gateway feature on the site. **4/26 – Comment remains, now applies to Lot 9 instead of Lot 6.**



Figure 1: Image of the existing stone wall, taken on a site walk in 2022

2. Given the extent of steep slopes, core forest areas, and sensitive wetland habitat on the site, a deed restriction should be considered to limit future clearing in areas outside of the proposed limits of disturbances/proposed residential yard areas. In particular lots 1, 2, 3 and 4 represent an opportunity to conserve sensitive contiguous habitat in perpetuity. **4/26 – The applicant is proposing a “green belt” around each parcel that would prevent future development in that area. We suggest that additional lands on lots 5, 6, and 7 be included. What is the enforcement mechanism for this land? Is it proposed as deed restrictions?**
3. There are existing wells on the property- are these proposed to be utilized or abandoned? **4/26 – Comment remains. The existing conditions plan shows six wells on the property. On the subdivision plan two are proposed to be used by residences. Will the other four be abandoned?**

SEQR/Coordination

1. Classification. We suggest waiting to classify the action until the limits of disturbance are more clearly shown and calculated, following consultation with the Town Engineer. Disturbances shown on the EAF indicate approximately 9 acres while a Type 1 action constitutes the physical alteration of 10 acres or more. **4/6 – After discussion at the August meeting and resubmission, the action was classified as Unlisted at the November meeting and circulated to commence a coordinated review. We suggest**

- that the applicant add the limits of disturbance to the plat for verification purposes. We note that the disturbance area remained the same despite relocating site access. After conservatively estimating the limits of disturbance on the most recent subdivision plan, 13.19 acres was indicated. Disturbance of more than 10 acres is a Type 1 action requiring a Full EAF Part 1.**
2. EAF. We suggest that a Full EAF be provided given the extent of disturbances and known sensitivity of the site. **4/26 – A revised short EAF was submitted in October and circulated with the Notice of Intent. See comment above.**
 3. SEQR General. While the Terramor project never received a SEQR determination from the Planning Board, a number of studies were previously prepared, including a bat study, visual analysis, traffic study, geotechnical analysis and correspondences with NYS DEC and NYSHPO. These may prove valuable to the applicant and the Board as a point of comparison of impacts previously considered.
 4. Cottontail Lane Access. Previous applications for development on this site have proposed only emergency access from Cottontail Lane with primary access from Route 212. While the Cottontail Lane access involves less disturbance of sensitive environmental resources, construction impacts due to truck traffic should be considered. Construction truck trips should be provided in terms of vehicle type and trip counts over the construction timeline. **4/26 – Access from Cottontail Lane is no longer proposed. Construction trips as described above should be provided for the proposed Route 212 access.**
 5. Wetland Permitting. With the revised NYS DEC Wetland laws, the Planning Board will need a solid understanding of the disturbance impacts and potential mitigations required by the NYS DEC of the applicant, as mitigations will likely affect the subdivision plat. “Assumed” DEC buffer areas are provided on the plat, but it is not clear whether this is due to a Determination made by the DEC. The status of any requests from the DEC should be provided, and discussions with permitting officers should be relayed to the Planning Board. We note that this project appears to qualify as a major action, and the standards for permit issuance can be found in 6 NYCRR 663.5. **4/26 – As noted above, the applicant has received negative JDs for both properties from NYSDEC. They state that they have initiated the wetland permitting process with US ACOE and are proposing expansion of the existing wetlands on Lots 3 and 4 to mitigate impacts. Existing drainage issues have been raised by residents in this area, and the applicant should address any potential impacts to drainage as a result of the regrading for wetland expansion.**
 6. Stormwater. We defer to the Town Engineer on this matter, but note that a Full SWPPP will be required and development must therefore be phased so that no more than five (5) acres are disturbed at a time. **4/26 – Applicant states that a SWPPP is in progress.**
 7. Referrals. The sketch plan should be referred to the Town Engineer, Town Highway Department, and Centerville Fire Department as soon as possible to ensure the Cottontail Lane access is appropriate and the new Town roadway meets required specifications. **4/26 – Applicant is no longer proposing access from Cottontail Lane, and access is now proposed from State Route 212. Applicant states that coordination with the fire department has commenced. Plans should be submitted to the DOT as well as the Town Engineer and Highway Superintendent, if not already done.**
 8. GML. Ulster County Planning Board review will be required once a complete preliminary plat is submitted.

Materials Previously Reviewed

- General Subdivision Application, prepared Solo Holidays LLC, dated August 4, 2025
- Short EAF form, prepared Solo Holidays LLC, dated August 5, 2025
- Subdivision sketch plan, prepared by Praetorius and Conrad, P.C., dated August 5, 2025.
- Cover letter by Praetorius and Conrad dated October 7, 2025
- Revised subdivision sketch plan dated October 7, 2025