



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: May 18, 2026

CC: Becky Bertorelli, Planning Board Clerk

We are in receipt of the following items:

- Subdivision sketch plan (5 Sheets), prepared by Praetorius and Conrad, P.C., dated May 5, 2026;
- NYS DOT Letter, signed Michael P. Tinnie, dated April 30, 2026;
- Updated Long EAF, prepared by Praetorius and Conrad, dated May 06, 2026;
- Draft Private Right of Way and Maintenance Declaration.

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.

A response letter was not included in the submission. We request that future submissions include a memo response letter.

Application Status

1. **Summary. This is the applicant’s fourth submission. No substantive site changes have been made since the last submission as far as we can tell, with updates including showing of disturbed area, a long EAF and additional submitted materials/communications. The application remains in the preliminary plat approval stage.**
2. **Procedural items. The project remains in public hearing. It was referred to the Ulster County Planning Board after the April 21st meeting and was considered at the County’s May 7th meeting. Their response was received on May 15th and is discussed below.**

3. **SEQR. A Notice of Intent was distributed after the November 18, 2025 meeting. No objections were received. The revisions to the plan mean that the disturbed area is now greater than 10 acres, making this a Type 1 action. We recommend that the project be recirculated.**
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. In particular we note that the limits of land disturbance should be shown on the plans.

5/19 – Comment remains, the applicant should request waivers in writing or address the requirements.

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.

5/19 – Comment addressed. The Board and applicant discussed conservation subdivisions at the April 21st meeting and determined that a standard subdivision was acceptable.

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.” **5/19 – Comment remains. The applicant has placed the entirety of the road on one parcel (lot 1). At the April 21st meeting, they noted that this had been acceptable on a prior plan (for Catskill Terraces, approved in 2022). The private roads in that project were short stub roads that did not pass beyond the properties to which they were assigned. In this case, the proposed road is approximately 1,700 feet long and goes far beyond Lot 1. The code is clear that property lines should come to the middle of the road, and we recommend that the plans be revised to comply with this standard. Fee ownership by adjacent owners makes more sense insofar as it gives each adjacent lot perceived responsibility for maintenance, rather than the potential perception that maintenance should fall to the fee owner in the event the maintenance provisions of the easement fail. See also Planning Comment 5 for an alternative strategy.**
 - 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. **5/19 – Comment remains, we do not know if this has occurred.**
 - 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.” **5/19 – An agreement has been provided with this submission. Once our comment above about lot boundaries has been addressed, we recommend that the agreement be referred to the Planning Board Attorney for review.**
 - d. Per §215-19A(8), “The subdivision plat shall show the road clearly labeled ‘private rural road’.” **5/19 – Comment addressed.**
 - e. Per §215-19B(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.” **5/19 – The road appears to be far longer than 1,200 feet. We note that the proposed private rural road seems to meet the Town’s local road standards with the exception of travel-way width, where 20’ is proposed instead of 26’. We recommend that this street be renamed a “proposed private local road” and the Planning Board waive the “minimum travelled-way” width of §215-211 to allow the 20’. This would relieve the application of the various standards and procedures relevant to private rural roads. We recommend fee ownership of each adjacent lot as discussed above.**

- f. **5/19 – A road profile of the full private road should be provided to confirm grading conformance with §215-19B(5) (or §215-21I if the Board approves the local road waiver as recommended in comment 3e).**
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.*
5/19 – At the April 21st meeting the applicant stated that they intend to pay the recreation fee.
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.* **5/19 – Comment remains, the project should be referred to the engineer when appropriate.**
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.* **5/19 – Comment remains, a note should be added to the plans.**
8. **5/19 – By definition contained in §215-8, the private driveways for lots 6 and 7 qualify as private rural roads and must also meet the requirements of §215-19 or receive a waiver of those provisions by the Planning Board.**

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.* **5/19 – The applicant has added the limits of disturbance to the plan. The rock wall on lot 9 passes over the septic expansion area, which would not be disturbed at this time. Disturbance of the wall appears to be limited to the roadway.**



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?* 5/19 – **Comment remains, applicant should address the preservation mechanism. We recommend a conservation easement be added to the plan and filed with the deeds of those lots.**
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?* 5/19 – **Comment remains, applicant should address in writing what is to be done with the existing wells.**
4. 4/26 – *The applicant states that a water testing report has been completed. This should be included in the next submission.* 5/19 – **The report was referred to the Town Engineer on April 22nd. We defer to the engineer.**
5. 5/19 – **While we recommend, as discussed above, that in the event that the road is controlled by easement and maintenance agreement each lot should share in fee ownership of the road, we do have some concern that it will be challenging for nine separate lot owners to successfully coordinate the maintenance of the proposed road and stormwater management facilities. If conflict arises and the facilities fall into disrepair, the Town could feel compelled to take over ownership or maintenance. As a more reliable way of assuring appropriate maintenance of the private road and stormwater management facilities on an on-going basis, the Board and applicant could consider placing the right-of-way and stormwater facilities on a separate lot, with the applicant filing a CPS-7**

(streamlined) Homeowners Agreement with the Department of State. Such an agreement will provide residents with a commonly utilized means of ensuring maintenance of the facilities and equitable sharing of costs without requiring the applicant to prepare a full custom (costly) HOA offering plan.

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. 5/19 – The applicant indicates 11.5 acres of disturbance and has shown the limits of disturbance on the plans. This is a Type 1 action. We recommend recirculation of the plans to involved and interested agencies.*
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. 5/19 – A full EAF was provided. We offer the following comments:*
 - a. **B.(d) on page 2 should say “Section 239 advisory opinion.”**
 - b. **NYSDEC should be removed from B.(g) as they have provided a negative JD and a permit is not required.**
 - c. **The Yes box for B.(h) should be checked.**
 - d. **C.2(c) on page 2 should be marked Yes. The area is cited as part of forest block G1 in the Town Open Space Plan (map 3).**
 - e. **C.3(b) on page 3 should be marked Yes, as the use is permitted.**
 - f. **D.2(a)(ii) and (v) through (ix) on page 4 should be completed.**
 - g. **D.2(c)(v) and (vi) on page 5 should be completed.**
 - h. **D.2(d) and D.2(d)(i) and (ii) on page 5 and D.2(d)(v) and (vi) on page 6 should be completed.**
 - i. **E.1(b) on page 9, the calculations for forested land should be corrected. Wetland areas should be included.**
 - j. **E.3(h) should be marked Yes. The project is within 5 miles of Catskill Park**
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.*

5/19 – Comment remains.

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.* **5/19 – Comment remains, we defer to the engineer.**
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.* **5/19 – A DOT letter has been provided. The plans should be referred to the engineer and highway superintendent when appropriate for review of the roadway and grading/erosion control.**
8. GML. Ulster County Planning Board review will be required once a complete preliminary plat is submitted. **5/19 – The project was referred to the Ulster County Planning Board after the April 21st meeting and was considered at the County’s May 7th meeting. The response was received on May 15th. It includes comments relevant to required permits and a condition recommending conservation easements and clearance limits for the proposed homes.**