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MEMORANDUM

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

FROM: Adriana Beltrani, AICP

RE: Solo Holidays LLC Subdivision- Part 2 EAF Discussion
Cottontail Lane and NYS Rt 212

DATE: October 16, 2026

CC: Becky Bertorelli, Planning Board Clerk
Khattar Elmassalemah, P.E., Applicant Engineer

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. The lots would be accessed from a Private Rural Road off of Route 212, and requiring approximately 10 acres of site disturbance and grading associated with the roadway, driveways and home lots. A deed restriction and wetland mitigations are proposed for remaining lands.

The applicant has not submitted any new material for the October 20, 2026 Planning Board meeting. This memorandum **only** offers a discussion of the attached draft Part 2 EAF. **All unresolved comments in our September 11, 2026 memo remain unresolved at this time.**

Part 2 Assessment

The proposed subdivision is a Type 1 action for which the Board is serving as Lead Agency. An NOI has been circulated to involved and interested agencies and a revised Part 1 EAF reflecting recent changes to the SEQR law has been submitted.

The Part 2 EAF, attached to this memo and discussed below, aids the Lead Agency in identifying whether supplemental information should be provided by the applicant to support a finding of no impact ("negative declaration") or whether an EIS is required to establish environmental impact findings ("positive declaration"). An impact identified as "moderate to large" on the Part 2 form does not necessitate the preparation of an EIS if impacts are appropriately addressed. The Board can request that the applicant prepare a response to the Part 2 EAF, also known as a Part 3. The Part 3 should be based on technical information and analysis that is part of the applicant's submission, and/or reference plans, policies and data sources as appropriate. We continue to advise the applicant that historic research and analysis performed relative to the Terramor project may be relevant to this SEQR review.

Below is our assessment, to be reviewed and confirmed or revised by the Planning Board as Lead Agency. Please refer to the Part 2 EAF. Our assessment for areas of moderate to large impacts are highlighted in that form.

1. Impact on Land
    a. *The proposed action may involve construction on slopes of 15% or greater.*
        i. The proposed roadway crosses several areas identified as steep slopes. The grading plan and erosion and sediment control measures should be detailed in a part 3, as well as the

amount of cut and fill required. Any Town of Saugerties steep slopes regulations should be addressed.

b. The proposed action may involve construction on land where bedrock is exposed.
   i. Average depth to bedrock on the project site is 2-3 feet. The applicant should identify where exposed bedrock is located on the site and discuss the implications for locating well and septic systems as well as placing basements and foundations. Discuss anticipated methods for handling bedrock during construction (ie, blasting, jackhammers etc.).

c. The proposed action may involve construction that continues for more than one year or in multiple phases.
   i. The proposed project anticipates a 24 month construction timeline. A general construction timeline should be provided, including anticipated traffic disruptions and construction related truck trips, extended use of heavy machinery, long term stockpile and materials staging and other potential disruptions to neighboring properties. Stockpiles and staging areas should be shown on site plans to ensure they do not require additional clearing areas or impact wetland or steep slope areas.

d. The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal.
   i. The EAF Part 1 indicates that 9.8 acres is proposed to be disturbed. Previous submissions have also suggested approximately 11.5 acres. These statements are not reflected by calculations on the Subdivision plans. Our September memo comment memo also identifies areas that should be included within the LOD line that are not. In addition, the potential impacts to neighboring properties from grading, per that memo, should be addressed.

   The SWPPP is currently being reviewed by the Town Engineer and a summary of the final SWPPP including stormwater management, stormwater quality, and erosion and sediment control techniques to be employed on the site should be provided to the Lead Agency.

2. Impact on Geological Features- *none identified*

3. Impacts on Surface Waters
   a. The proposed action may involve construction within or adjoining a freshwater or tidal wetland, or in the bed or banks of any other water body.
      i. We note that a 1.3 acre wetland mitigation is proposed for .5 acres of impact incurred to the ACOE wetland from the access road. The extent of construction impacts should be described, including the amount of fill and placement of culverts, and the mitigation measures described. In particular, mechanisms for the long term maintenance and management of the constructed wetland, located on two privately owned proposed lots, should be discussed.

   b. The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.

   c. The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.
      i. See 1.d.ii above and discuss measures directly intended to protect wetlands and receiving water bodies from siltation and other potentially degrading effects.

4. Impact on Groundwater
    a. *The proposed action may require new water supply wells, or create additional demand on supplies from existing water supply wells.*
        i. The Part 1 identifies a daily water demand of 3,960 gallons/ day. The results of well tests should be provided and the ability for the site to support the proposed drawdown should be assessed.
    b. *The proposed action may allow or result in residential uses in areas without water and sewer services.*
    c. *The proposed action may include or require wastewater discharged to groundwater.*
        i. The applicant should discuss the methods of water and septic employed for the proposed lots, including lots that require specialized septic systems due to low depth to bedrock, and lots where proposed septic areas are located distant from the proposed home location. Discuss the potential for groundwater contamination over the principal aquifer due to the added septics.
    d. *The proposed action may result in the construction of water supply wells in locations where groundwater is, or is suspected to be, contaminated.*
        i. Address concerns regarding PFAS and 1, 4 dioxane in the groundwater, including a discussion of applicable NYS DOH requirements and policies. We note that water testing was performed for the Terramor project.

5. Impact on Flooding- *none identified*
6. Impacts on Air and Climate- *none identified*

7. Impact on Plants and Animals
    a. *The proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site*
    b. *The proposed action requires the conversion of more than 10 acres of forest, grassland or any other regionally or locally important habitat.*
        i. While the Part 1 does not currently identify rare or endangered species on the site, the forest patch is identified in the Town of Saugerties Open Space Plan as a "globally important forest block" and by Ulster County as a "Habitat Core" area. Prior mapping and habitat assessments have been performed with this condition in mind. Discuss the species likely to utilize the site, drawing from previous habitat assessments conducted. In particular, discuss the potential for endangered bat species, songbirds, and amphibians to utilize the forest and wetlands on site, and the potential impacts on species and the health of the forest block due to site clearing and habitat fragmentation.

8. Impact on Agricultural Resources- *none identified*

9. Impact on Aesthetic Resources- While the Catskill Park is nearby, we do not believe that the proposed action will result in any moderate to large impacts to aesthetic resources. **We defer to the Planning Board to confirm this.**

10. Impact on Historic and Archeological Resources
    a. *The proposed action may occur wholly or partially within, or substantially contiguous to, an archaeological site not included on the NY SHPO inventory.*
        i. Public comment for the Terramor project previously included the potential for native artifacts to be present on the site. Correspondence from SHPO should be provided as well

as a discussion relative to the potential presence of artifacts on site and the process for reporting these if found.

11. Impact on Open Space and Recreation.
    a. *The proposed action may result in an impairment of natural functions, or "ecosystem services", provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat.*
        i. See comments related to stormwater, erosion and sediment control, water quality, and wildlife habitat.

12. Impact on Critical Environmental Areas- *None Identified*
13. Impact on Transportation- *None identified*
14. Impact on Energy- *None identified*

15. Impact on Noise, Odor and Light- We have selected "no or small impact may occur" for all items in this list based on the applicant's Part 1, however, we request additional detail related to construction, above, which may relate back to noise impacts.

16. Impact on Human Health
    a. *The proposed action is located within 1500 feet of a school, hospital, licensed day care center, group home, nursing home or retirement community.*
        i. Address potential impacts to the Woodstock Day School.
    b. *The proposed action may result in excavation or other disturbance within 2000 feet of a site used for the disposal of solid or hazardous waste.*
        i. While the site of the Saugerties landfill is over a mile away, we believe the plume of contamination reaches within 2,000 feet of the site. This, and the potential hazards to residential water sources, should be discussed.

17. Consistency with Community Plans- *No impacts identified*
18. Consistency with Community Character- *No impacts identified*
19. Impact on Disadvantaged Communities- *No impacts identified*
20. Future Physical Climate Risks- *No impacts identified*