

**ENVIRONMENTAL DESIGN
PARTNERSHIP, LLP.**

Shaping the physical environment

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March 11, 2024

Mr. James Martin
Zoning Administrator
Town of Moreau
351 Reynolds Road
Moreau, NY 12121

Regarding: Jacobie Farms PUDD
 TDE Response Letter

Dear Mr. Martin:

We have received the comment letter from Laberge Group dated February 16, 2024 for the above referenced project(s). In response to their comments, we offer the following:

Roadway Notes

1. *The project proposes to relocate a portion of an existing public roadway and establish park improvements in lieu of park and recreation fees. These proposed elements require close coordination with the Town Highway Department and the Town Board.*

Response: Comment Noted. The applicant has had ongoing conversations with the highway department. The highway department is not opposed to the relocations and reconstruction. Construction details and maintenance jurisdiction will continue to evolve throughout the planning process.

2. *Right-of-way abandonment and dedication actions will be needed for the project and may require special legislative actions.*

Response: Comment noted. The highway department and the Town Board are involved in the proposal.

3. *Access changes in the Town Park appear to be needed because of the proposed development plan and may require additional coordination with outside agencies.*

Response: The applicants are prepared to modify the park entrance as needed to accommodate the project design. Details for the park entrance modification will be worked through as part of the site plan review process.

4. *Town of Moreau subdivision regulation §124-23 requires at least two street connections with existing public streets for subdivisions containing 35 lots or more, with the ability to install a double-width entry. To meet this section's requirements, the entrance design from Ganesvoort Road may need to be modified.*

Response: The existing access road that traverses through the town park will be utilized as an emergency access road for the PUDD. It is understood that this road is plowed and maintained by the highway department.

5. *Town of Moreau subdivision regulation §124-23 also requires "streets in the subdivision shall provide for the continuation of principal streets of adjoining subdivisions, and for proper projection of principal streets into adjoining properties which are not yet subdivided". The Board should consider whether private roads and deeded rights of way should be established to provide "future connection links" to the north and south and needed.*

Response: The Town Board and Planning board shall make recommendations and decide the applicability of future connection links for this project.

6. *The community master plan shows a "future public road and trail connection" that extends to a parcel located to the south. It is unclear whether this right of way will be dedicated to the Town as required by §124-23, or whether this roadway will be constructed to meet Town requirements and subject to an agreement that allows it to be dedicated in the future. In either case, the stormwater infiltration basin and associated grading should be removed from the future public right-of-way. A culdesac will be required if a public roadway is proposed. Alternatively, the Town Attorney should determine whether it is possible for the Town to execute an agreement that would bind future landowners and allow for future dedication.*

Response: The current plans do not provide "future public road and trail connections." The north south access road will be privately owned and maintained, not offered for dedication to the town.

7. *The existing pavement structure of the roadway that connects the Town park to Gansevoort Road does not appear to be structurally adequate to support planned construction activities. Repair of roadway sections to be used during construction may be needed before construction starts.*

Response: The road conditions will be assessed pre and post construction. If repairs are necessary as the result of construction impacts the applicant will be responsible for those repairs.

8. *Plans for any public roadway should be prepared in full conformance with the Town of Moreau General Legislation, Chapter 124 Subdivision of Land, Part 2 Highway Design and Construction Standards, or as otherwise approved by the Town Highway Superintendent.*

Response: See response to comments 1-3.

9. *The Town Highway Superintendent should be consulted to determine whether the proposed roadway realignment into the park is compatible with snow removal operations. A culdesac may be required per subdivision regulations.*

Response: See response to comments 1-3.

10. *Responsibility for sidewalk and community pathway maintenance needs to be determined. This review assumes that the homeowner's association responsible for stormwater systems will also be responsible for sidewalk and pathway maintenance.*

Response: See response to comments 1-3.

11. *Future plan submittals should include a roadway construction phasing plan and details as required to maintain public access to the Town Park.*

Response: The requested details shall be provided as part of site plan review of the application.

Sanitary Sewer System Notes

12. *Direct discharge into the forcemain on Bluebird Road will not be possible until the sanitary sewer pump station at the Grove on Sisson Apartment project is completed per the Town's agreement with the apartment complex developer. Project phasing plans for the Jacobie Farms project should be coordinated closely with the Town to determine if timing for a direct connection is feasible.*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments.

13. *If needed because of project schedules, a low-pressure sewer connection point currently exists near 116 Bluebird Road. A connection at this location will allow the Jacobie PUD to temporarily discharge flow to the City of Glens Falls treatment plant, assuming sufficient treatment capacity is available. At this connection point, valves will enable the Town to easily redirect flow to the Saratoga County system after the Grove on Sisson pump station is operational.*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments.

14. *An engineering report, plans, and specifications for the proposed sewer system will need to be prepared and submitted for review by the Water Department during future Planning Board review phases. The report, plans, and specifications should fully conform with the NYSDOH and NYSDEC requirements and the Town of Moreau General Legislation requirements, including but not limited to Chapter 115 Sewer. Sanitary sewer system materials and design information shown on the conceptual plans submitted for PUDD review should not be considered as reviewed or subject to approval as part of proposed PUDD legislation.*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments. The necessary plans and reports will be provided to the Town and other pertinent agencies at the appropriate time.

15. *The conceptual sewer plan does not indicate which sections of the low-pressure sewer main will be privately owned and operated or dedicated to the Town. This review assumes that the system located on private property and private roadways will serve only the proposed development and, therefore, will not be dedicated to the Town. If future submissions establish that sections of the system have been designed and are located in a manner that can be extended or otherwise utilized to support the development of adjacent lands, the Town should consider accepting the dedication those specific sections.*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments. All individual laterals will be privately owned all mains collecting flow from more than one individual owner must be dedicated to the town. Please see revised figures showing only the infrastructure to be dedicated.

16. *The Town Board should consult with the Town's Special District Counsel to determine developer application requirements and the legislative action needed for the project to join District 1, Extension 5, as described in Town Code §115-75. The developer may be required to prepare a Map, Plan, and Report to support required legislative actions of the Town Board.*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments.

Drinking Water System Notes

17. *The conceptual water plan does not indicate whether the drinking water main located on private property or along private roadways will be privately owned and operated or dedicated to the Town. This review assumes that only the drinking water infrastructure located along the public roadway or in the Town Park will be dedicated to the Moreau Consolidated Water District. If the "future public road and trail connection" shown on the community master plan is dedicated as a public roadway, the water main should be dedicated to the Water District. The main should also be constructed with restrained joints, fittings, and an isolation valve to allow extension without requiring service interruption.*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments.

18. *Although multiple connections to the water main along the Town roadway are shown to provide service to multiple units and buildings, please note that the Water Department may require master meters and check valves to be installed at the property lines in accordance with §145-24(E).*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments.

19. *An engineering report, plans, and specifications for the water system should be prepared in full conformance with NYSDOH and Town of Moreau requirements for review as part of a future Planning Board application. Water system materials and design information shown on the conceptual plans should not be considered as reviewed or subject to approval as part of proposed PUDD legislation.*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments. The necessary plans and reports will be provided to the Town and other pertinent agencies at the appropriate time.

20. *The engineering report should evaluate system benefits that may be gained from an interconnection with the water system proposed to serve the subdivision of lands directly north of the Jacobie PUD.*

Response: Thank You. The applicant is working directly with the town sewer and water

department all sewer and water related comments.

21. *The existing Moreau Consolidated Water District does not encompass the entire property to be developed. The Town Board should consult with the Town's Special District Counsel to determine developer application requirements and the legislative action needed for the project to join the Moreau Consolidated Water District, as described in Town Code §146-16.*

Response: Thank You. The applicant is working directly with the town sewer and water department all sewer and water related comments. The necessary plans and reports will be provided to the Town and other pertinent agencies at the appropriate time.

Stormwater Notes

22. *The project will require establishing a new stormwater system along a relocated public roadway. Features to be owned and operated by the Town should be limited to those located within the public right of way, and their design should be coordinated closely with the Town Highway Superintendent. It is noted that relocation of the Town's roadway will require the addition of stormwater management areas that are not currently applicable and will require additional effort for the Town Highway Department to maintain. If plans rely on treatment of roadway stormwater within the private stormwater management system, the Town Attorney should determine whether the standard stormwater management agreement is applicable.*

Response: Comment noted. The plans do account for the road drainage be collected within both the proposed SMA areas. It is our understanding that the Town of Moreau does not own SMA and a HOA will be required to own and maintain these areas.

23. *As previously noted, the stormwater infiltration basin and associated grading should not extend across a planned Town right-of-way. A Stormwater Pollution Prevention Plan, plans, and specifications for the stormwater system should be prepared for review by the Stormwater Officer or Town Engineer. Stormwater documents should fully conform to NYSDEC and Town of Moreau General Legislation, Chapter 120. Stormwater system information shown on the conceptual plans submitted for PUDD review should not be considered as reviewed or subject to approval as part of proposed PUDD legislation.*

Response: Comment noted. A Full SWPPP will be prepared in accordance with NYSDEC guidelines currently with the site plan review process.

24. *Soil borings and infiltration testing will be needed in accordance with NYSDEC Stormwater Design requirements. Although past soil investigations identified in the stormwater narrative indicate fast infiltration rates, if buildings with basements are located near infiltration basins, a groundwater mounding evaluation may be needed.*

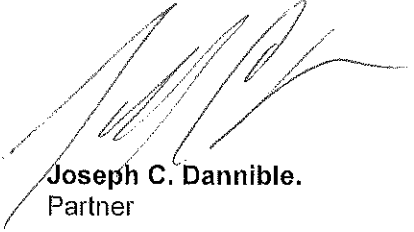
Response: Test pits and infiltrations test were completed during review of the previously proposed 49 lot subdivision plans. The result of that exploration concluded that adequate separation to ground water exists and that the conceptual design of the basins has adequate storage capacity for the anticipated design flows.

Mr. James Martin
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If you have any additional questions or comments, please feel free to contact our office at your convenience.

Sincerely,
Environmental Design Partnership



Joseph C. Dannible.
Partner