ROCKLAND COUNTY COMPREHENSIVE PLAN Rockland County, New York



FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT







January 2011

FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT (FGEIS)

ROCKLAND COUNTY COMPREHENSIVE PLAN

Rockland County, New York

Lead Agency:

Rockland County Legislature Allison-Parris County Office Building 11 New Hempstead Road New City, NY 10956

Contact:

Hon. Harriet D. Cornell T. 845.638.5269

Prepared By:

BFJ Planning 115 Fifth Avenue New York, NY 10003 T. 212.353.7474 www.bfjplanning.com

Applicant:

Direct Action by Rockland County Legislature

DATE DGEIS ACCEPTED: November 16, 2010

DATE OF PUBLIC HEARING: December 20, 2010

CLOSING DATE OF COMMENT PERIOD: December 31, 2010

DATE FGEIS ACCEPTED: February 15, 2011

WEB ADDRESS FOR ELECTRONIC COPY OF THIS FGEIS: www.rccompplan.com

Environmental Consultants:

BFJ Planning

115 5th Avenue New York, NY 10003 Contact: Frank S. Fish, FAICP, Principal T. 212.353.7476

Urbanomics

115 5th Avenue New York, NY 10003 Contact: Regina Armstrong, Principal T. 212.353.7465

McLaren Engineering Group

100 Snake Hill Road West Nyack, NY 10994 Contact: Steven L. Grogg, P.E., Chief, Site-Civil Division T. 845.353.6400

List of Involved Agencies:

Rockland County Legislature

Allison-Parris County Office Building 11 New Hempstead Road New City, NY 10956 T. 845.638.5269

Office of the Rockland County Executive

Allison-Parris County Office Building 11 New Hempstead Road New City, NY 10956 T. 845.638.5122

List of Interested Agencies:

Town of Clarkstown

10 Maple Avenue New City, NY 10956 Justin Sweet, Town Clerk T. 845.639.2010

Village of Upper Nyack

328 North Broadway Upper Nyack, NY 10960 Carol G. Brotherhood, Village Clerk T. 845.358.0084

Town of Haverstraw

One Rosman Road Garnerville, NY 10923 Josephine E. Carella, Town Clerk T. 845.942.3727

Village of Pomona

100 Ladentown Road Pomona, NY 10970 Lisa Thorsen, Village Clerk T. 845.354.0545

Village of Haverstraw

40 New Main Street Haverstraw, NY 10927 Judith R. Curcio, Village Clerk T. 845.429.0300

Village of West Haverstraw

130 Samsondale Avenue West Haverstraw, NY 10993 O. Fred Miller, Village Clerk T. 845.947.2800

Town of Orangetown

26 Orangeburg Road Orangeburg, NY 10962 Charlotte Madigan, Town Clerk T. 845.359.5100 x2227

Village of Grand View-on-Hudson

118 River Road Nyack, NY 10960 Julie Pagliaroli, Village Clerk T. 845.358.2919

Village of Nyack

9 North Broadway Nyack, NY 10960 Mary White, Village Clerk T. 845.358.0548 x545

Village of Piermont

478 Piermont Avenue Piermont, NY 10968 Denise Ehrhart, Village Clerk T. 845.359.1258 x303

Village of South Nyack

282 South Broadway Nyack, NY 10960 Sara Seiler, Village Clerk T. 845.358.0287

Town of Ramapo

237 Route 59 Suffern, NY 10901 Christian G. Sampson, Town Clerk T. 845.357.5100 x263

Village of Airmont

251 Cherry Lane PO Box 578 Tallman, NY 10982 Irene Murphy, Village Clerk T. 845.357.8111

List of Interested Agencies (continued):

Village of Chestnut Ridge

277 Old Nyack Turnpike Chestnut Ridge, NY 10977 Florence A. Mandel, Village Clerk T. 845.425.2805

Village of Hillburn

31 Mountain Avenue Hillburn, NY 10931 Gladys DeFresse, Village Clerk T. 845.357.2036

Village of Kaser

15 Elyon Road Monsey, NY 10952-3021 Allie Pinkasovitz, Village Clerk T. 845.352.2932

Village of New Hempstead

108 Old Schoolhouse Road New City, NY 10956 Carole Vazquez, Village Clerk T. 845.354.8100

Village of New Square

766 North Main Street Spring Valley, NY 10977 David Breuer, Village Clerk T. 845.354.5778

Village of Montebello

One Montebello Road Suffern, NY 10901 Debra Mastroeni, Village Clerk T.845.368.2211

Village of Sloatsburg

96 Orange Turnpike Sloatsburg, NY 10974 Thomas Bollatto, Village Clerk T. 845.753.2727

Village of Spring Valley

200 North Main Street Spring Valley, NY 10977 Sherry Scott, Village Clerk T. 845.352.1100

Village of Suffern

61 Washington Avenue Suffern, NY 10901 Virginia Menschner, Village Clerk T. 845.357.2600

Village of Wesley Hills

432 Route 306 Wesley Hills, NY 10952 Barbara Cartaya, Village Clerk T. 845.354.0400

Town of Stony Point

74 East Main Street Stony Point, NY 10980 Joan Skinner, Town Clerk T. 845.786.2716 x108

TABLE OF CONTENTS

1.	INTRODUCTION 1
	A. GENERIC ENVIRONMENTAL IMPACT STATEMENT
	B. Project Location and Environmental Setting
2.	PUBLIC HEARING AND COMMENT PERIOD
	A. Public Hearing and Comment Period Process
	B. Public Comments and Responses
3.	EDITS TO THE PROPOSED ACTION

LIST OF FIGURES

Figure 1: Regional Location Map
Figure 2: Generalized Land Use Map

<u>APPENDICES</u>

Appendix 1: Written Comment Letter

1. INTRODUCTION

This Final Generic Environmental Impact Statement (FGEIS) has been prepared pursuant to the State Environmental Quality Review Act (SEQR) and its implementing regulations (6 NYCRR Part 617). Under those regulations, the FGEIS serves as the basis for the Lead Agency Findings; the Rockland County Legislature is the Lead Agency for this environmental review. This FGEIS, which has been prepared to respond to all significant environmental comments made on the Draft Generic Environmental Impact Statement (DGEIS), was accepted by the Rockland County Legislature for circulation on February 15, 2011. In accordance with Section 617.9(b)(7) of the SEQR regulations, this FGEIS incorporates by reference the DGEIS. The proposed action in the DGEIS is the adoption of the Rockland County Comprehensive Plan.

The FGEIS is organized into four sections: Section 1 describes the public review process, project location and environmental setting; Section 2 contains a summary of all written comments (no comments on the DGEIS were made at the public hearing) and provides responses to each of those comments (public comment letters and public hearing transcripts are located in Appendix 1); Section 3 describes the edits that have been made to the Comprehensive Plan in response to issues and concerns raised during the public comment period; and Section 4 concludes this FGEIS.

A. Generic Environmental Impact Statement

This environmental impact statement for the Rockland County Comprehensive Plan has been prepared as a Generic Environmental Impact Statement (GEIS). Under SEQR (§617.10), a "Generic" EIS, or GEIS, is prepared when a proposed action represents a comprehensive program having wide application and defining the range of future projects in the affected area. The Comprehensive Plan is an area-wide policy document, not a development application or development project. It includes the adoption of general policy initiatives to guide and facilitate the desired future development of Rockland County.

A Generic EIS, according to New York State Department of Environmental Conservation (NYSDEC) SEQR handbook, is "...A type of EIS that is more general than a site-specific EIS, and typically is used to consider broad-based actions or related groups of actions that agencies are likely to approve, fund, or directly undertake." As noted in the SEQR handbook, "... A Generic EIS differs from a site or project specific EIS by being more general or conceptual in nature." In addition, Section 617.10(c) of the SEQR regulations requires that a GEIS set forth the specific conditions under which future actions will be undertaken or approved.

B. Project Location and Environmental Setting

Rockland County, comprised of 176 square miles and containing approximately 300,000 inhabitants, is located in southern New York State, approximately 30 miles northwest of Manhattan (see Figure 1: Regional Location Map). The County is bordered to the northwest and west by Orange County; to the south by Bergen and Passaic counties, in New Jersey; and to the east by the Hudson River. Westchester and Putnam counties are located across the Hudson River to the east and northeast, respectively. The eastern boundary of Rockland County comprises nearly 40 miles of scenic river coastline. The County contains five towns and 19 incorporated villages, as well as eight school districts and numerous special districts that provide fire protection, water supply, and other services.

Considered the gateway to the Hudson Valley, Rockland County is linked to the greater region by the New York State Thruway (Interstate-87/287), the Palisades Interstate Parkway, Route 9W, and the Garden State Parkway Extension. In addition to its roadway network, the county is accessible by rail, bus, and ferry services.

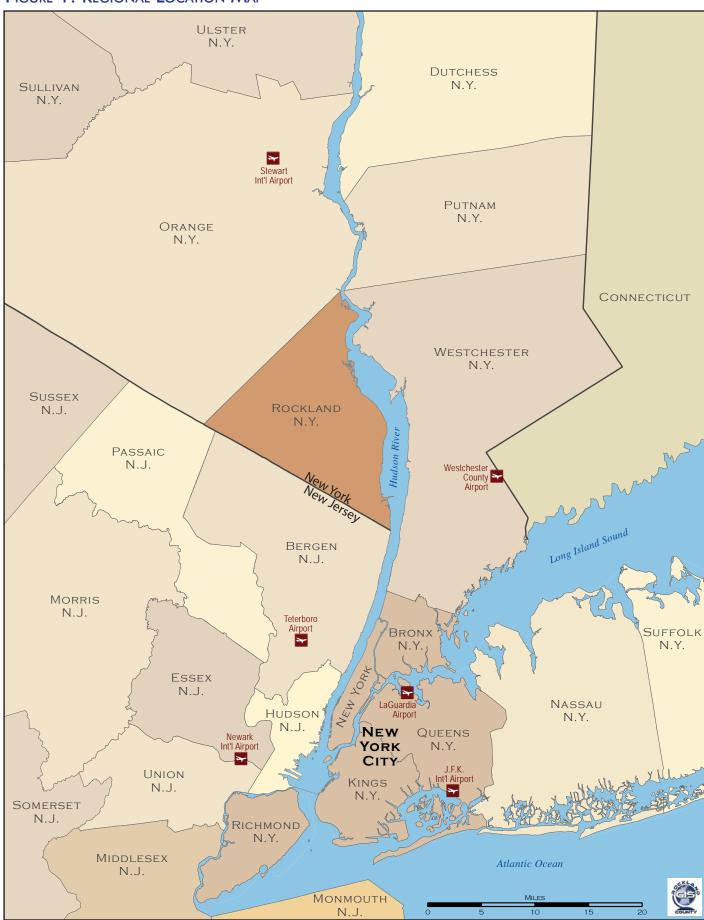
As in many areas located within a larger metropolitan area, Rockland County's early development was established by agriculture and localized industry, which gave rise to modest suburban expansion. From the early 20th century on, the County's population grew with expansion of its rail network, and later its road systems. Today, land uses in the county range from traditional mixed-use, relatively dense village and hamlet centers to lower-density suburban residential areas, and regional shopping centers to light industrial parks (see Figure 2: Generalized Land Use Map).

Parkland¹ represents the single largest land use, comprising just under one-third of the county's total land area, and other open space – local parks, open spaces, private recreation areas and water areas – totals another approximately 8% of land area. Single-family residences make up the largest category of developed land uses, representing more than 28% of the total land area in Rockland County.

_

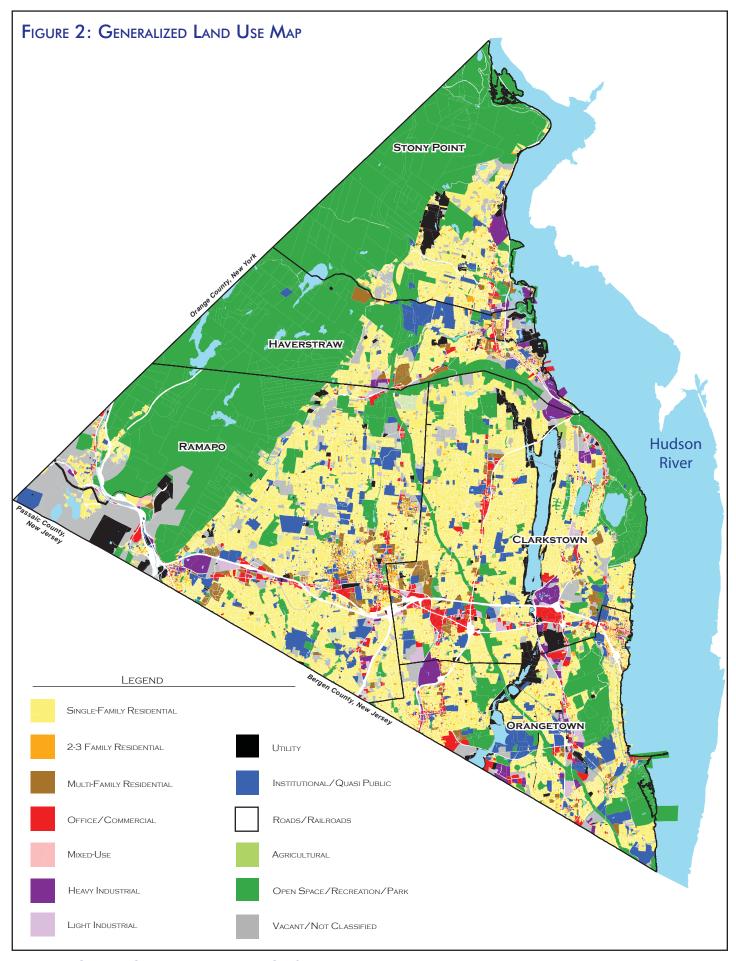
¹ Parkland and open space also include the Palisades Interstate Parkway, a Scenic Byway and a Natural National Landmark.

FIGURE 1: REGIONAL LOCATION MAP



ROCKLAND COUNTY COMPREHENSIVE PLAN FGEIS

Prepared By: Rockland County Planning, 2010 Source: Rockland County Planning



Rockland County is rich in natural features. In addition to the Hudson River, the county contains several other major rivers and water bodies, including the Mahwah, Ramapo, and Hackensack rivers, as well as Lakes Welch, Sebago, Tappan and DeForest, and Rockland Lake. Rockland County is distinctive in that its water supply comes almost entirely from within its borders, although not all of Rockland's water stays within the county. The county's water supply comes from two sources: aquifers (notably the Ramapo-Mahwah sole-source aquifer and the Newark Basin bedrock aquifer) and surface water resources.

2. PUBLIC HEARING AND COMMENT PERIOD

A. Public Hearing and Comment Period Process

The public comment period on the DGEIS (dated November 2010) opened on November 16, 2010 and extended through December 31, 2010. Written comments were received from the public during this time, and submitted to the Rockland County Legislature. During this period, a public hearing on the DGEIS was also held on December 20, 2010 at 7 pm at the Rockland County Legislative Chambers, located at the Allison-Parris County Office Building, 11 New Hempstead Road, New City, NY 10956. A public hearing on the Draft Comprehensive Plan was also held on the same day and at the same location at 5:45 pm. A copy of the written comment letter received on the DGEIS is provided in Appendix 1.

B. Public Comments and Responses

At the public hearing on the DGEIS, there were no verbal or written comments received from the public, involved or interested agencies, or Rockland County Legislature. During the public review period (between November 16, 2010 and December 31, 2010) one individual submitted written comments on the DGEIS. This individual is listed below:

Letter Author	Author Affiliation	Date of Letter
Patricia M. DuBow	Mayor of the Village of South Nyack	December 23, 2010

The mayor had three comments that pertain to the DGEIS (see page 6 of her letter, contained in Appendix 1). The comments are listed below:

Written Comments

1. Patricia M. DuBow

- 1-1 Comment: "The List of Interested Agencies should list South Nyack as the 'Village of South Nyack'".
- 1-1 *Response:* Agreed. The list of Interested Agencies, located on the title page of this FGEIS, has been updated to reflect this change.
- 1-2 *Comment*: "Throughout, update listed recommendations accordingly with those added to the Comprehensive Plan as suggested above" (pages 1 through 6 of her letter).
- 1-2 Response: Pages 1 through 6 of Mayor DuBow's letter are devoted to comments on the Draft Rockland County Comprehensive Plan and were not specific environmental concerns on the DGEIS. The comments on the Comprehensive Plan were reviewed separately by Rockland County in terms of minor revisions to the Plan. It is not necessary to duplicate them in a FGEIS.
- 1-3 *Comment*: "Add the proposal for the "lid park" over I-287 in South Nyack and the reclamation of land from the Exit 10 interchange redesign for local economic development. See the discussion, "Lid Park and Economic Development Initiative", above".
- 1-3 Response: This proposal is incorporated and supported in the Comprehensive Plan. The lid park recommendation is already contained in the DGEIS. As was stated in the DGEIS, this is a site-specific proposal that will require a thorough review by the New York State Department of Transportation (NYSDOT) in its ongoing EIS review of the Tappan Zee Bridge / I-87/287 Corridor Project.

3. EDITS TO THE PROPOSED ACTION

In response to the verbal and written comments received during the public comment period and public hearing on the Draft Rockland County Comprehensive Plan, Rockland County has performed a review and has clarified several sections and recommendations in the Comprehensive Plan. The edits made to the Comprehensive Plan tend to reduce the potential for significant adverse environmental impacts that could occur as a result of the adoption of the Comprehensive Plan. None of these edits rise to a level of SEQR environmental significance.

One of the adverse impacts identified in the DGEIS is the fiscal impact of several Comprehensive Plan recommendations upon the County taxpayer. These impacts have now been mitigated by the following changes:

- Summit Park Hospital and Nursing Care Center: It was previously recommended in the Draft Comprehensive Plan that funding should be provided for a new Summit Park Hospital and Nursing Care Center in Pomona. However, based on the current economic conditions, this recommendation has been dropped. Rockland County intends to provide for the continued mission and services of the Summit Park Hospital and Nursing Care Center, but alternative ownership structures of the hospital and nursing care center are being evaluated.
- Office of Sustainability: It was previously recommended in the Draft Comprehensive Plan that an Office of Sustainability be created in order to coordinate and oversee the County's efforts in addressing climate change and developing policies for energyefficient/green building and conservation measures. Due to the current economic conditions, the recommendation to create this office has been eliminated from the updated Comprehensive Plan. However, the Plan still supports these measures under the auspices of the appropriate existing Rockland County departments.
- Emissions Reduction Goals: Specific emissions reduction goals/targets were previously identified in the Draft Comprehensive Plan and have since been removed. For example, the Plan called for an emissions reduction goal of 20% from 1990 levels by 2020. Although these goals were proposed as possible reasonable targets, they were eliminated until further specific goals could be created with the implementation of a Countywide Climate Action Plan. The Climate Action Plan is currently proposed as another recommendation in the Draft Comprehensive Plan, along with additional climate change policies.

APPENDIX 1: WRITTEN COMMENT LETTER

Hillage of South Nyack Rockland County, N.Y.

Incorporated 1878

RECEIVED

DEC 2 8 2019

DEPT. OF PLANNING

PATRICIA M. DUBOW MAYOR 282 8. BROADWAY SOUTH NYACK, NY 10960 (845) 358-0287

December 23, 2010

Rockland County Legislature Comprehensive Plan Comments 11 New Hempstead Road New City, New York 10956

The following constitutes the Village of South Nyack's comments on the Public Hearing Draft of the Rockland County Comprehensive Plan dated November 1, 2010 and the Draft Generic Environmental Impact Statement (DGEIS) dated November 16, 2010.

Lid Park and Economic Development Initiative

The Village of South Nyack has been promoting an initiative that sees the current I287/TZB project as presenting a unique opportunity to provide a beneficial recreational and economic component to the river villages region. This initiative addresses many of the goals in draft Rockland County Comprehensive Plan, including to:

- Provide open space
- Promote economic opportunities
- Provide for cultural and economic sustainability
- Improve the regional environment

We propose that when the new Tappan Zee Bridge is built, a park be constructed on top of the I-287 roadway as it passes through South Nyack. In planning parlance this sort of structure is called a "lid park", as it provides a cover over the highway, which will provide recreational, environmental and beautification benefits to all the citizens of Rockland County.

While the proposal is mentioned in this draft as a "suggestion", the Village believes the proposal's benefits should be explained fully and the proposal should be explicitly recommended in this Comprehensive Plan.

South Nyack is the only municipality that the Thruway goes through that is eligible for historic designation. It has one of the largest percentages of historic homes in the region.

The original construction of the bridge in 1955 had a disproportionate, devastating effect on the Village of South Nyack. More than 100 homes were taken and the entire commercial district was eliminated.

The highway bisected South Nyack. The hillside half, including Nyack College, is detached from the riverside half. It is extraordinarily cumbersome to get back and forth between the two sections

One positive thing the Exit 10 redesign does do is it shrinks the interchange, significantly reducing its footprint. That freed-up land is rightly South Nyack's and it can be put to much better use.

South Nyack today is exclusively residential. This continues to make long-term sustainability of our Village a real challenge. Like so many other Villages, our residents are finding it harder and harder to afford to live here. The costs have made it less attractive for people to be able to move here.

We need to reconnect our Village and provide for cultural and economic sustainability.

The initiative to create a "lid" or deck covering I-287 from the river to the "cut" would provide tremendous benefits:

- Reconnects South Nyack's hillside and riverside neighborhoods
- Provides a unique recreational environment for the region
- Reclaims wasted land for economic development
- A green project that improves the environment

"Lid parks" are not a new concept. There are over 60 such projects already completed or currently under construction across the United States.

The unique topography of the highway corridor lends itself to this concept. The hillside neighborhood naturally flows down to the park, providing many points of access. The downhill side presents a sharp drop, which actually presents an opportunity to creatively incorporate structural elements into the park.

Buildings consistent with the parkland environment can provide:

- A revenue stream to sustain the project and the Village
- Transitions from the street level to the park level.
- Opportunities for light commercial uses, which would:
 - Provide services to the park users and local residents.
 - Provide commercial income opportunities for South Nyack.

This is a green project. Covering the highway provides environmental benefits:

- Visual improvement (both local and Hudson River viewshed)
- Air pollution reduction (capture and scrub)
- Noise and vibration reduction
- Incorporating the buildings under turf is ideal for employing energy-saving green technologies.

The current I287/TZB project proposes a mass-transit station at Exit 11, providing mass-transit access to the new Esplanade Park, including both pedestrians and cyclists. The park would link the transit station to the bike lanes on the bridge and cross-connect with the Espositio Trail and Long Path.

The Village believes this initiative is economically feasible by employing a public/private partnership, incorporating income-producing elements to sustain the project.

The Village has been promoting this project for several months and has consistently received overwhelming support. A survey of South Nyack residents had over 80% in favor. Every local

official we have discussed this with supports the concept, including our neighboring Villages, our State representatives, and representatives from the NY State Parks Department.

This initiative will benefit the entire county. To make it happen will require the cooperation of every level of government: Village, County, State and Federal. It is the position of the Village of South Nyack that the "Lid Park" proposal should be explicitly recommended in this Comprehensive Plan

Specific Comments

Section 2.1

In the paragraph on page 12 about the Tappan Zee Bridge, the second sentence should read "Connecting South Nyack to Tarrytown..." (not "Nyack").

The plan should state that the construction of Route I87/287 bisected South Nyack, eliminating over 100 homes and the entire business district. The Village of South Nyack is the only National Register Qualified municipality the Thruway passes through.

Section 2.3

The first paragraph on page 16 states that the proposed BRT service "...is an effective approach to addressing traffic congestion along I87/287..." and "...the transit option would help to decrease vehicle traffic congestion levels along the corridor." This not factual. The <u>Tappan Zee Bridge / I-287 Environmental Review - Alternatives Analysis Report, January 2006</u>, states, "...significant congestion reduction on the Thruway itself would not occur under any of the transit alternatives."

Section 6.6

Recommendation #1 states that, "...the transit option would help reduce private automobile trips." This is not factual. The <u>Tappan Zee Bridge / I-287 Environmental Review - Alternatives Analysis Report, January 2006</u>, demonstrates that the proposed added transit modes would have an insignificant effect on vehicle trips. In fact the report states that the proposed transit would primarily "...divert a large number of riders from transit services that currently exist in the corridor."

Recommendation #1 concludes that, "The impact of the Tappan Zee Corridor project on local and community character must be fully studied and addressed." The Village of South Nyack fully supports this statement. The proposed redesign of Exit 10 appears to have been limited exclusively to the ability to ease ingress and egress with the Thruway and without regard to the health, safety and welfare of South Nyack residents.

Recommendation #6 should state that Rockland County should *adopt* the principles of the Federal and New York State Safe Routes to School (SRTS) program county-wide. (See http://safety.fhwa.dot.gov/saferoutes/ and

https://www.nysdot.gov/divisions/operating/opdm/local-programs-bureau/srts.)

The County should coordinate State, County and local agencies to adopt and incorporate the principles into transportation projects. This would include the development of Safe Crossings over highways, especially I287. (See this example from Mercer Island, WA: <a href="http://maps.google.com/maps?f=q&source=s_q&hl=en&geocode=&q=Mercer+Island,+WA&sll=en&g

37.0625,-

95.677068&sspn=42.445866,71.103516&ie=UTF8&hq=&hnear=Mercer+Island,+King,+Washin gton&ll=47.58741,-122.230593&spn=0.002214,0.00434&t=k&z=18).

Recommendation #6 should include a recommendation that the new bicycle and pedestrian lanes on the proposed replacement Tappan Zee Bridge be tied into existing pedestrian and bicycle trail networks.

Chapter 7

This chapter should explicitly address the value of the viewshed of the Hudson River.

This chapter should explicitly address the inappropriate use of the Exit 10 interchange as a construction staging area for the Thruway. Such use is a visual eyesore and is likely to result in ground contamination.

Section 7.5

In the sub-section on Critical Environmental Areas, it should be stated that all of the Village of South Nyack lies within three designated Critical Environmental Areas. The Village CEA Declarations, dated September 8, 1998 have been sent under separate cover to the Rockland County Planning Department.

Section 7.6

This section should explicitly address the air, noise and vibration pollution from the Thruway.

The sub-section on Noise Pollution should mention that sound barrier walls reflect noise and actually worsen noise pollution in some locations, particularly along hillsides, such as the hillside neighborhoods of South Nyack.

Section 7.9

Recommendation #4 should include reference to protecting the viewshed of the Hudson River.

Recommendation #5 should include encouraging the use of sound absorbing materials on highway sound barriers to reduce noise reflection to uphill areas, such as the hillside neighborhoods of South Nyack.

Recommendation #5 should include encouraging studying of decking over highways to reduce noise and vibration pollution and to possibly capture and scrub vehicular emissions.

Recommendation #6 should include a statement that in the redesign of the Exit 10 interchange, title and control of any land not directly used for the new interchange be returned to the Village of South Nyack for beneficial use.

Section 8.4

Recommendation #2 should include a recommendation that the new bicycle and pedestrian lanes on the proposed replacement Tappan Zee Bridge be tied into existing pedestrian and bicycle trail networks. The proposed Lid Park in South Nyack would provide a "hub", linking the new TZB bicycle/pedestrian lanes with the Esposito Trail and Long Path.

In Recommendation #11, the concept of decking over I-287 is mentioned as merely a "suggestion." This recommendation should be strengthened and expanded as it supports many of this Comprehensive Plan's objectives. See the discussion, "Lid Park and Economic Development Initiative", above.

Section 9.1

This section should include a statement that the Village of South Nyack has been identified as "National Register Qualified." The Village of South Nyack is the only National Register Qualified municipality the Thruway passes through.

The Village of South Nyack is a municipality that has one of the largest proportions of older homes in the Hudson Valley. (25% pre-1900 vs. 10% in Sleepy Hollow.)

Section 11.1

It should be noted that the construction of the Thruway completely eliminated South Nyack's business district.

Section 11.3

It should be noted that the initiative to construct a deck over I-287 in South Nyack and reclaim land from the Exit 10 interchange redesign is proposed to include economic development elements as well as open space. The unique topography of the highway corridor lends itself to this concept. The hillside naturally flows down to the deck and the downhill side presents a sharp drop, which presents an opportunity to creatively incorporate structural elements that could be used for commercial development. See the discussion, "Lid Park and Economic Development Initiative", above.

Section 11.4

Recommendation #3 should explicitly recommend the proposal to construct a deck over I-287 in South Nyack and reclaim land from the Exit 10 interchange redesign to potentially include economic development elements. See the discussion, "Lid Park and Economic Development Initiative", above.

Recommendation #6 should explicitly recommend the proposal to reclaim land from the Exit 10 interchange redesign to reestablish a commercial center for South Nyack. See the discussion, "Lid Park and Economic Development Initiative", above.

Section 12.1

This section should discuss how water utilities are currently required to expand supply to meet projected demand growth and how this is difficult in Rockland County.

Section 12.8

Add a recommendation that the County should encourage the New York State legislature to change state laws that require water utilities to expand supply to meet projected demand growth. Regulations should allow for the limitation of development that would increase demand where increasing supply is difficult, such as in Rockland County.

Section 14.2

Include a specific recommendation for the "lid park" over I-287 in South Nyack and the reclamation of land from the Exit 10 interchange redesign to restore the integrity of South Nyack. See the discussion, "Lid Park and Economic Development Initiative", above.

Section 14.8

Strengthen the recommendation on the "lid park" with elements from the discussion, "Lid Park and Economic Development Initiative", above.

Section 14.2

Include a specific recommendation for the "lid park" over I-287 in South Nyack and the reclamation of land from the Exit 10 interchange redesign to restore the integrity of South Nyack. See the discussion, "Lid Park and Economic Development Initiative", above.

Section 14.8

Strengthen the recommendation on the "lid park" with elements from the discussion, "Lid Park and Economic Development Initiative", above.

Section 14.11

Include a specific recommendation for the "lid park" over I-287 in South Nyack and the reclamation of land from the Exit 10 interchange redesign for local economic development. See the discussion, "Lid Park and Economic Development Initiative", above.

Comments on the Draft Generic Environmental Impact Statement (DGEIS)

The List of Interested Agencies should list South Nyack as the "Village of South Nyack"

Throughout, update listed recommendations accordingly with those added to the Comprehensive Plan as suggested above.

Section 6.1

Add the proposal for the "lid park" over I-287 in South Nyack and the reclamation of land from the Exit 10 interchange redesign for local economic development. See the discussion, "Lid Park and Economic Development Initiative", above.

We hope that these comments will be given serious consideration.

Sincerely,

Patricia M. DuBow

Mayor