

February 14, 2022

Dear Orangetown Comprehensive Plan Committee and AKRF representatives,

We have been following this Comprehensive Plan process and we thank you for your hard work.

We are representatives of *CUPON (Citizens United to Protect our Neighborhoods) Hamlets of Orangetown* which was organized to address concerns with land use and zoning issues.

We appreciate AKRF's and the CPC's consideration of resident input and continuing to hear community comments during the development of the Comprehensive Plan.

In reference to the January 26, 2022 meeting, we hope AKRF and the CPC will consider the following:

**Proposed Goal: Where appropriate, update zoning map and code to create transitional districts between hamlet centers and suburban neighborhoods.**

*CUPON Comments:*

*-Define: transitional district, hamlet center, and suburban neighborhood. What zoning do they fall under, and what uses would be permitted?*

*-Define affordability versus diversity of housing typologies.*

*- If the purpose is to provide affordable housing for young families and seniors, a zoning district that allows for density without price constraints defeats the purpose. The outcome is usually extremely expensive townhomes that don't benefit either group.*

*-Partnering with government agencies and appropriate developers to create truly affordable starter housing, without driving up overall density at market rate, should be considered.*

*-The assessment of water use, energy, and sewage generation should be a priority. Flooding is a problem throughout Orangetown and the addition of more impervious surfaces only makes it worse.*

*-The impact of increased density, new development and the addition of many data centers increases electrical usage. Renewable energy sources should be considered.*

**Proposed Goal: The existing Zoning Code is cumbersome in the way it is set up making it confusing to interpret and difficult to implement.**

- a. **Eliminate some of the commercial zoning districts. Several of the zoning districts have substantially similar allowable uses and dimensional regulations. Consider combining these districts into one district.**

**b. Restructure the use and bulk tables to improve readability and understanding of the specific district regulations**

*CUPON Comments:*

- Agreed, the set up of the existing code is cumbersome and confusing.*
- Change the way the code is presented. The myriad cross-references and setback calculations are too complex. Right now, the rules regarding adjacent zones are designed to protect residential zoning areas which are valuable and we don't want to lose that.*
- Combining zoning districts would have the negative effect of increasing the permitted bulk and widening the acceptable uses. For example, LI, LIO, LO all have subtle differences.*

**Proposed Goal: Update the Route 303 Overlay District for clarity, enforcement and to minimize variance requests.**

*CUPON Comments:*

- How will the overlay be updated/changed? It should conform to the community's vision/desire and NOT the wants of the existing businesses. Currently, existing and proposed new businesses continue to push the limits of the existing zoning.*
- Requirements for commercial development should be designed to protect residential neighborhoods.*
- The Sparkill Creek, wetlands and the watershed have been overbuilt resulting in flooding and environmental degradation. Protections for these waterways must be implemented.*

**Proposed Goal: Update nuisance regulations to improve resident quality of life. Increase minimum buffer requirements between commercial and residential uses. Review noise, light and odor regulations.**

*CUPON Comments:*

- Adopt the common definition of light industrial which is found at this site:  
[www.lawinsider.com/dictionary/light-industrial](http://www.lawinsider.com/dictionary/light-industrial)  
"Businesses are operated so that noise, odor, dust, emissions and glare of such operations are completely confined within an enclosed building and is not detectable outside or from the street."*

**Proposed Goal: Update the Tree Preservation Ordinance to regulate the removal of mature trees (e.g., 8 inches in diameter at breast height or greater), on private property.**

*CUPON Comments:*

- This should include reforestation and replanting regulations so that the same number of trees that are cut down are replanted.*

*-Impose strict requirements and enforcement on industrial/commercial properties which are totally clear cut. For every tree cut, two should be planted.*

*-Tree replacement for environmental benefit, flooding mitigation, screening and beautification is crucial.*

**Proposed Goal: Develop a Town wetlands protection ordinance.**

*CUPON Comments:*

*- Prioritize the protection of the Sparkill watershed and other waterways by adhering to federal guidelines that regulate pesticide, fertilizer use, and pollution from run-off.*

*-Require parking areas to be constructed using new permeable materials instead of solid pavement, and also remove pavement from vacant land.*

**Proposed Goal: Review Special Permit and Conditional Use permit standards and update as necessary to address current uses and concerns.**

*CUPON Comments:*

*-See comments above regarding zone combining.*

*-The frequency of special and conditional use permits speaks to the fact that incorrect uses are being requested and encouraged in these zones.*

**Proposed Goal: Establish performance standards within the Town's zoning code to mitigate traffic impacts.**

*CUPON Comments:*

*-The uncontrolled increase in trucks and traffic is unacceptable.*

*-Poor road conditions and the lack of sidewalks/crosswalks, bus stops, and pedestrian safety measures needs to be addressed.*

*-Zoning must consider that large warehouses, with dozens of truck bays, will exponentially increase truck traffic which seeps into and congests residential neighborhoods.*

*-The proposed increase of warehouses and commercial businesses is unsafe and creates air and noise pollution 24/7 in residential communities.*

**Proposed Goal: Update the allowable uses and definitions to recognize uses not previously contemplated and assign appropriate performance standards where applicable.**

*CUPON Comments: None, until details are presented.*

**Proposed Goal: Develop a steep slopes and ridgeline protection ordinance.**

*CUPON Comments: Agreed*

**Proposed Goal: Develop design guidelines for facade signage and streetscapes to preserve, protect and enhance the unique characteristics of each hamlet.**

*CUPON Comments: Agreed*

**Proposed Goal: Update zoning code to include design guidelines and protections for rural and scenic roadways.**

*CUPON Comments: Agreed*

**Proposed Goal: Review flexible/conservation subdivision requirements.**

*CUPON Comments: Agreed, if this means tightening this up.*

## **Additional Goals:**

- Create an Orangetown Economic Development Plan, hire qualified people and allocate resources to attract appropriate and desirable businesses. Duplicate the success that we see across the border in Closter, Norwood & Northvale, New Jersey. Survey Orangetown residents.*
- Create a Town inventory of existing properties, especially in the RT 303 corridor, organizing properties by type: banks, warehouses, strip malls, factories, commercial businesses, restaurants, hotels.*
- Create an inventory of properties that are currently for sale, needed for business development outreach.*
- Create safe, walkable communities with sidewalks, crosswalks, bus stops on RT 303 and throughout Orangetown.*
- Relocate commuter parking to existing developed areas with safe, sheltered bus stops to encourage public transportation.*
- Agendas and back up materials for all meetings and committees should be posted two days in advance.*
- All meetings made public and viewed virtually with a link on the webpage for public comment.*

*-The radius of neighbor notification of building department appearances should be increased.  
ESPECIALLY if it is a commercial project.*

### **What is the Vision of Orangetown and what drives it? RICH IN HISTORY**

Orangetown's motto: RICH IN HISTORY. The developmental decisions the Town makes should reflect the value of preserving our historic homes, places, and surroundings. This motto should be at the forefront of and reflected in every development decision.

RT 303 is the spine that runs through the Town of Orangetown. It is industrial, devoid of proper tree plantings, unsightly, and most businesses do not serve the community. At the time of the 2003 Comprehensive Plan, oversized, big box warehouses were not in existence.

There should be a moratorium on the approval of all warehouses until the Comprehensive Plan decides and outlines what the RT 303 corridor should look like. The Town should develop a plan to create attractive and useful public services, businesses, and cultural establishments. Perhaps create a new RT 303 task force with representatives from various groups to brainstorm and shape the vision.

Thank you for your consideration and the opportunity to share comments.

CUPON Hamlets of Orangetown