



Environmental, Planning, and Engineering Consultants

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December 5, 2022

Teresa Kenny, Supervisor
Town Board, Town of Orangetown
26 W Orangeburg Rd,
Orangeburg, NY 10962

Re: Town of Orangetown 2022 Comprehensive Plan

Dear Supervisor Kenny and Members of the Town Board:

AKRF is in receipt of the following written and verbal public comments in relation to the Draft Comprehensive Plan update:

- Rockland County Comment Letter pursuant to General Municipal Law (GML) § § 239-1 and -m dated October 24, 2022
- Comprehensive Plan Comments by the Town of Orangetown Planning Board dated October 21, 2022
- Verbal comments from the October 25, 2022 Town Board meeting
- Written comments by Deborah Franzblau dated November 3, 2022
- Written comments by Seth Mandelbaum dated September 30, 2022
- Written comments by Whiteman Osterman & Hanna, LLP dated October 25, 2022

AKRF has revised the Draft Comprehensive Plan to address a number of the comments received. The substantive changes are summarized in **Table 1** below. In addition, Comments from the Rockland County Comment Letter have been addressed as noted in the response letter in **Attachment A**.

**Table 1
Draft Comprehensive Plan Revisions**

Description of Edit	Page(s)
Recommended a building height maximum in downtown of three stories areas.	77
Added overview and recommendation for Planned Adult Community (PAC) floating district.	47, 77
Recommend studying parking demand before improving parking supply.	116, 121, 122
Revised Objective 5 to consider allowing repurposing of existing industrial/commercial buildings for alternative uses.	17
Recommended adding new permitted uses in LI/LO districts already permitted in commercial districts.	68, 231

However, certain comments were not incorporated into the revised Draft Comprehensive Plan. These comments are summarized in **Table 2** below.

Table 2
Comments Considered but Not Incorporated

Overarching Comment	Response
The Comp Plan supports increased density in certain locations. We are concerned that this is inconsistent with community character.	As written, the Draft Comprehensive Plan aims to strike a balance between contextual infill development, the need for affordable and workforce housing, the preservation of community character and historic resources, and the protection of the environment.
Remove recommendations for merging certain zoning districts.	This recommendation is intended to correct pre-existing non-conforming conditions on single-family lots. This revision would make it easier for homeowners to make simple improvements to their homes (e.g. addition of decks, garages) by decreasing the need for variances.
Plan recommends working w/ the County re: transit improvements. This has been unsuccessful in the past.	Maintaining recommendations such as these in the Comprehensive Plan will assist the Town in future partnerships and the seeking of grant opportunities.
Implement a moratorium on Warehousing.	The Draft Comprehensive Plan recommends a number of changes to address the quality-of-life concerns raised by residents in regard to warehouses. However, a moratorium is not included in the recommendations.
Soften the language on regulating warehouses.	The Draft Comprehensive Plan aims to strike a balance between resident quality of life concerns and the need for commercial development within the Town to maintain its tax base. The recommended implementation measures speak to design guidelines, traffic control measures, and minimizing the impacts of trucks in residential areas.

We look forward to discussing the above with the Town Board on December 13, 2022.

Sincerely,
AKRF, Inc.



Ashley Ley, AICP
Vice President – Planning and Land Development