



June 3, 2021

Mr. Michael McLaughlin, Chair
Town of Mount Pleasant Planning Board
One Town Hall Plaza
Valhalla, NY 10595

Dear Chairman McLaughlin and Members of the Planning Board,

I am writing to express concern regarding the proposal before the Town of Mount Pleasant to permit the clearing of forest by a private utility company to install an at-grade solar facility on a 42.7 acre undeveloped parcel adjacent to the Gate of Heaven Cemetery. We believe that a portion of the site comprises the headwaters of Davis Brook, tributary to the Bronx River, and that denuding the hillside of the forest buffer area will have a negative impact on the wetlands that feeds Davis Brook, and in turn, the Bronx River.

The current and future functioning of both the "known" wetland straddling the Taconic State Parkway lands and the newly identified vernal system in the interior of the site should be carefully studied and protective and mitigative measures identified.

Protection of the wetlands is not addressed sufficiently in the Stormwater Analysis or in the EIS document prepared by Whitman, the applicant's Engineering firm. Their conclusion that the runoff and recharge characteristics of the site will not be negatively impacted by the development is based on the incorrect assumption that there will be no impervious surface in the post-construction condition, despite the site being covered with impervious solar voltaic panels that will collect and concentrate stormwater over the entire site. Without an accurate assessment of the volume and intensity of stormwater generated from the panels, and the alterations to the runoff and recharge characteristics of the site due to the extreme tree canopy loss, the impact on the wetlands has yet to be determined.

In addition, the only protective measure identified for the wetlands is a 50 foot buffer. This dimension is a bare minimum. The buffer width should be based on the characteristics of the wetland, landscape type and topography of the surrounding area. Buffers on steeper slopes, like the ones surrounding the wetlands, should be wider to allow more time for overland flow and infiltration. Unfortunately, Whitman has not followed their 50 foot "standard," as buffer widths of 25 feet are shown on their site plans.

Finally, the note found throughout the site plans stating, "Environmentally sensitive area to be used for stormwater management," clearly states the intention of the applicant. Rather than protect and enhance the wetlands, preserving their ability to naturally respond to the impacts of climate change, they intend to use the wetlands as their stormwater control feature, like a convenient bit of low-cost infrastructure.

We are asking that the Planning Board require the applicant to revise their analysis to accurately address the post-construction stormwater characteristics of the site and to re-design the proposal to protect the Town of Mount Pleasant's wetlands, treating them as the environmentally sensitive resource they currently are and must continue to be to protect the Town from the impacts of climate change.

Finally, we also ask that the Planning Board consider modifying the Freshwater Wetlands ordinance to recognize vernal wetland systems, and that this wetland, inclusive of a carefully delineated recharge area acknowledging its position within a steep wooded area, be added to the Town Wetlands Map.

We thank you in advance for your attention to this matter that we see as critical to controlling additional stormwater and the resultant negative impacts in the Bronx River Watershed.

Best regards,

A handwritten signature in black ink, appearing to read "Robert L. DelTorto". The signature is fluid and cursive, with the first name "Robert" and last name "DelTorto" clearly distinguishable.

Robert L. DelTorto

President

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