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25 March 2020

Mr. Lee S. Bergus, Planning Board Chairman
and Board Members
Town of Goshen Planning Board
P.O. Box 217
41 Webster Avenue
Goshen, NY 10924

RE: Clifford Ryan
2 Lot Small- Scale Subdivision – Well Testing
127-129 Cross Road, Town of Goshen, Orange County, NY
Section 19, Block 1, Lot 66.1

Dear Chairman Bergus:

Enclosed are plans of the Ryan 2-Lot Subdivision revised to reflect the comments of the planning board and the review letter received from Sean Hoffman, P.E. dated March 13, 2020. In response, we offer the following comments:

B) Review of Submitted Materials

1. Zoning:

d) Dimensional Requirements

- As requested the notation of “lot width” has been revised to “road Frontage” on the plan sheet.
- The amount of impervious coverage on each lot has been added to the plans. Lot No. 1 is at 10.2% and Lot No.2 is at 8% which is well below the 15% maximum allowed.

e) Environmental Control Formula

The environmental control calculation has been added to the plan. There are three soil types on site. The area of each soil type on the two lots has been shown together with the calculation of the portion of each that is supported. Based on the calculation, both lots are sub-sized because the supported portion of each lot does not total 1.0 or greater. Given the fact

that each lot is only one acre in size, only the most exceptionally good soils would permit a complying lot of one acre each. As you are aware, the houses are existing, and the applicant cannot make the lots larger or shift area from one lot to the other to make either of the two lots conforming to the Environmental Control Formula. The soil testing performed onsite clearly demonstrates that a septic system for each lot can be designed to support the house. Mr. Hoffman has indicated that his office would like to witness additional soil testing in the area of the septic system which our office would be pleased to accommodate. Regardless of the deficiency of the Environmental Control Formula calculations, septic systems are needed for the existing houses and the septic systems shown are designed according to New York State Department of Health (NYSDOH) requirements and will work.

3. Utilities

b) Sewage Disposal Systems

- As noted above this office will accommodate H2M with onsite witnessing of soil testing.
- Mr. Hoffman correctly notes that the design of the septic system utilizes the Department of Health rate of 110 gpd per bedroom. If the existing plumbing fixtures in the houses are not post-1994 fixtures, then as part of a Condition of Approval or Condition of a Building Permit for renovations, that the applicant be held to replacing the fixtures so they are complaint.
- The separation distance table shown on Sheet 2 has been updated to the most current version. The 100' minimum separation distance listed in the table for wetlands and leach fields is only required for New York State Department of Environmental of Conservation (NYSDEC) regulated wetlands. The wetlands onsite are ACOE wetlands and the 100' separation distance does not apply.
- The plan has been updated to show the location of the curtain drain around each of the two septic systems.
- The references to the Orange County Department of Health (OCDOH) shown on the septic system details of Sheet 2 have been removed.

4. Stormwater – The limits of disturbance have been shown on the plan. It should be noted that the disturbance will be only for the septic systems and the

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construction of the two new wells. The total disturbed area will be no greater than 17,035 square feet. This is well below the one-acre threshold for compliance under the SPDES general permit.

5. Miscellaneous -

- Wetlands - Mr. Hoffman correctly notes that no disturbance is proposed for the wetlands. No confirmation by the ACOE is needed.
- Street Trees – The houses on these proposed lots are existing. There is an existing tree hedge along the rear of the property as well as ornamental plantings in the front yards of both lots. Additional tree planting in conformance with [§83-19(B)] is not necessary.
- Existing Utility Abandonment – Mr. Hoffman correctly notes that the existing utilities will be abandoned in place. The existing lines will be capped off in accordance with standard practice at locations convenient for the owner and contractor.

If you have any questions, or need additional information , please contact the undersigned.

Very truly yours,
MJS Engineering & Land Surveying, PC

James C. Clearwater, PLS
Project Manager

JCC/mlp
Encl.

cc Mr. Clifford Ryan, Owner