From Public Hearing

10.28.26

Traffic

Hello my name is Margaret Dey and I live at

97 Cascade Road, Amenia

The project lacks transparent studies on the traffic impact. The minimum number of vehicle trips coming in and out of this project will be more than 50. I believe this will have a significant amount of horrific implications. In their last submission, HRH stated that they would like the speed limit on Route 22 near this project to be lowered from 55 MPH. Again, this shows how little effort they are putting into making sure that their facts are correct as the speed limit is already 45 MPH. With 26 homes, 2 cars each, plus mail delivery, UPS, Amazon and other deliveries coming in and out of this project there will be more than 50 vehicles trips a day.

I believe HRH's first traffic study was flawed. For example, it was performed when the full student body of the Webutuck Central School was not in session, resulting in an inaccurate reflection of traffic on Route 22 during school hours. HRH

claimed there would NOT be an impact.

A "traffic study" that claims 90 more cars would not cause any problems is ridiculous!! That might be true in Manhattan, but it certainly would not be the case here, in a rural area. How would this extra traffic created by 26 new homes with likely 2 vehicles per home NOT affect the current traffic issues that already exist.??? The traffic on Rt.22 has increased significantly in just the last few years, affecting everyday travel and especially on weekends. I can't imagine what 50 more cars and trucks would do to our already overwhelmed traffic issues coming out of Cascade Road, Food Town, North Road and Folan Road. Perrijo Circle

I realize the New York State Department of Transportation will govern but mostly likely not mitigate our concerns. Perhaps each member of the planning board should park safely in that area on a Friday night or Sunday afternoon to see what traffic is really like. Please use common sense!!!!

Patrick Caldarelli, 75 Cascade Road

As a longtime former firefighter and emergency medical technician with Wassaic Fire Company, and have previously covered the town of Amenia as an EMT with Northern Dutchess Paramedics, I've responded to numerous accidents at the Freshtown Plaza entrance. Mr. Boyles and Mr. Walsh with fire company experience can also attest to how dangerous that corridor can be. Building this subdivision in an area of high congestion without additional traffic controls or accounting for crosswalks is extremely reckless, especially considering the speed limit in that area is 45 MPH. With increased foot traffic, It's my opinion that somebody will get seriously hurt or killed trying to cross Route 22 to get to the shopping center, or pulling into or out of this development. Please take this into consideration. I thank you for your time.

~~For those~~ Because of these reasons, I am asking the board to—

Alan Peck
74 Cascade Road
Dear Board Members,

I take strong exception to the nonchalant attitude surrounding the risk that our wells may go dry as a result of the additional water demand from this development.

While I understand this primarily affects Cascade residents, that does not make the concern any less real or important.

I have been told that gauges will be placed on my well during the 72-hour pump-down test when the new wells are drilled.

That is a limited snapshot. It will NOT account for drought conditions, seasonal low water tables, or long-term cumulative drawdown.

Those are the circumstances that will most likely to reveal problems.

If my well goes dry or becomes unreliable, the cost and burden of drilling it deeper will fall entirely on me.

Neither the board nor the developer (HRH) will be responsible. That is not an acceptable outcome when the increased demand is being created by this project.

No one can predict the future with any certainty, but THE prudent course is to err on the side of caution.

I am asking the board to take this risk seriously and to require meaningful protections for existing wells before moving forward.

Thank you for your attention to this matter.

Sincerely,
Alan Peck

AMENIA FIRE DISTRICT # 1
BOARD OF FIRE COMMISSIONERS
PO BOX 214, AMENIA NEW YORK 12501

January 5, 2026

Amenia Planning Board
4988 Route 22
Amenia, New York 12501

Re: Cascade Creek Subdivision
Cascade Road, Amenia

Dear Members of the Amenia Planning Board,

On behalf of the Amenia Fire District #1, the Authority Having Jurisdiction (AHJ), we are submitting the following fire protection requirements and requests for clarification regarding the proposed Cascade Creek Subdivision.

Water Supply for Fire Protection
The project site does not have access to a municipal water supply. Additionally, the applicant has indicated that interior automatic sprinkler systems will not be installed. Based on NFPA fire flow calculations for one and two family dwellings with a combined total area of less than 22,000 square feet, the Amenia Fire District requires a minimum fire flow of 1,500 gallons per minute for a duration of two (2) hours, equating to a total available volume of 180,000 gallons.
This water supply must also be capable of being refilled in a timely manner during an active emergency incident. The longer a fire burns, the worse the air quality becomes, and the more damage to the environment that occurs. Immediate water supply is a significant environmental factor.

Natural Water Sources
The use of natural water sources in the immediate area cannot be relied upon, as their availability is not guaranteed year-round or during emergency conditions. Therefore, such sources are not considered a dependable means of fire protection for this development.

Water Storage Tank Location and Monitoring
Any proposed underground water storage tanks shall be strategically located near each entrance to the subdivision to ensure efficient fire department access. In addition, all underground tanks must be equipped with a built-in water level alarm system that continuously allows for monitoring of available fire protection water.

Fire Apparatus Access and Turnaround
Fire apparatus turnarounds must extend deeper than 50 feet, exclusive of the roadway. The Amenia Fire District recommends a minimum depth of 70 feet plus the full width of the road to ensure safe and effective maneuvering of fire apparatus.

Winter Road Maintenance
Clarification is requested regarding responsibility for road maintenance during winter months, including snow removal and ice control. Specifically, we request confirmation as to whether this responsibility will fall under a homeowner's association (HOA), the Town of Amenia, or another entity.

These items are critical to ensuring adequate fire protection and emergency response capabilities for the proposed development. The Amenia Fire District looks forward to reviewing the applicant's responses and any revised plans addressing the concerns outlined above.

Respectfully submitted,

Peter Deister, Chairman
Amenia Fire District #1
Board of Fire Commissioners

Ashley Merritt 60 cascade rd.

While we know the town has a density bonus for workforce housing and conservation subdivisions. Residents and the town boards have pointed out the housing law needs to be clarified

The town has been asked repeatedly to seek council to clarify the law. As it states Under the Town of Amenia's local law, the Amenia Housing Board could be officially responsible for administering and monitoring the town's workforce housing program.

The Housing Board failed to issue a recommendation to the Planning Board within 45 days of notification. We kindly ask them to be held accountable for not putting the community first.

I am requesting that a performance bond is in place before any construction begins. To ensure that the town and its taxpayers are never left financially responsible.

I urge the board to implement a policy requiring these bonds:

Financial protection / safety & compliance / developer accountable.

We are not against development. We want Smart growth to help our rural communities achieve their goals for growth and development while maintaining their distinctive rural

character. I am against the high density of the development being proposed.

Town Board Statement – Bob Powell – 135 Mygatt Road

With this project you are changing the rural nature of Amenia in ways that have not been fully thought through. The proposals put forward, discuss the specifics of how to build this new community in detail, yet show little to no concern for the general well-being of Amenia or the true impact this will have on the town and on everyone who already lives here. You are ignoring those of us who moved here precisely to get away from the kind of development now being proposed.

Make no mistake about what this is. This is low-income housing being placed in the middle of our community by people who have not demonstrated any real advantages to its implementation. I personally moved here forty years ago to escape this type of thing, thinking that the people in a rural town like Amenia would always want to maintain the charm and serenity of an uncluttered, clean, and quiet landscape. That is the character that drew me here and one that the people of this town have worked to preserve.

The plan emphasizes unit counts, eligibility rules, and construction details while giving far less attention to the cumulative effects on traffic, services, the rural setting, and the people who already call Amenia home. Those of us who chose this town for its low density and separation from denser patterns have a legitimate stake in how these changes will alter the place we have lived in for decades. The proposals should address those impacts with the same seriousness given to the design of the new buildings.

One of the reasons I moved here was so that my kids could grow-up in an environment like the one I had the opportunity to grow-up in back in the 60's. One that wasn't over-crowded, over-stimulated, crime-ridden and poorly planned. Landscape that had open land, farms, woods and scattered houses rather than continuous development. A place where the physical surrounding is quieter and more open.

There are trade-offs that come with that character—fewer nearby services and amenities, longer drives for some things. But the physical and social atmosphere this town provides is one of the clearer reasons people choose to live here. Please do not wreck what we all have here and what we have come to appreciate every day. This proposed development is completely out of character for Amenia and will wreck the reason so many of us came here in the first place.

Hi Kenny Merritt 60 cascade rd

There are 2 projects in this town that are currently under the boards review cascade creek and Kene stud. One is workforce housing and the other is going to be for millionaires. Cascade has been under review since 2024 keen stud has been under review since 2021. Kene stud has had to produce multiple renderings of what the visual impact will be while cascade creek has not been held to the same standard even though it will have more houses on less acreage. Cascade creek is in the rural residential 1 acre zoning area and keen stud is in the Rural agriculture which is a 10 acre zoning area. The difference is keen studs lots are on average 1.5 times larger than the minimum while cascade creeks lot size is on average 4 times smaller.

Cascade creek was before this board for a year working on there conservation findings. The board wanted to preserve the rare to the area Wappingers soil along the stream and the stream corridor. Then once the applicant was told to redesign and come back to the board in the SEEKER process they dropped a whole 2 houses and pushed the remaining houses towards the stream and to top it all off put there storm water mitigation ditch and retention pond in the rare Wappingers soil and removed the community garden.

We also ask that the planning board take into consideration that the town is currently taking steps to redo their master plan, and this type of development might be phased out. We ask that the board would consider a moratorium as Pine Plains did in the 2010's

regarding the carvel country club property. Which was a similar high density housing development. While I am not naive, I know something will be built on this lot. While we have been told that this project keeps with the character of the surrounding community, that is simply not true no houses of this lot size have been built after 1969!!!!

October 28, 2026

To: Town of Amenia Planning Board jwestfall@ameniany.gov

Re: Cascade Creek Subdivision – Public Hearing Comments

Dear Planning Board Members,

I am writing to express my concerns regarding the Planning Board's decision to issue a negative declaration for the Cascade Creek subdivision.

Following the meeting at which the negative declaration was adopted, I remain concerned about whether several important environmental issues were sufficiently addressed before the Board determined that a full Environmental Impact Statement was unnecessary.

In particular, I have concerns about:

- **Groundwater and private wells:** Whether the cumulative impact of 26 homes, a shared water supply, and wastewater disposal systems has been adequately evaluated, particularly given existing groundwater concerns in Amenia.
- **Conservation and agricultural resources:** Whether the conservation analysis sufficiently addresses the loss of valuable agricultural soils, impacts on the stream corridor, and the environmental value of the land proposed for preservation.
- **The Town Engineer's findings:** Whether the concerns raised in the December 10, 2024 memorandum were fully addressed and what documentation supports the Board's conclusions.
- **The negative declaration:** Whether sufficient information was available to determine that the project would not result in significant adverse environmental impacts.

I live on Old Route 22, south of Amenia, and rely on a private well. Over the years, we have experienced declining water production and have had to deepen our well. During a recent drought, we also experienced problems with the well. Given these experiences, I am particularly concerned about the cumulative impact of additional development on our groundwater resources and whether sufficient analysis has been conducted to protect existing residential wells.

I would like to understand what studies or independent assessments the Planning Board relied upon to conclude that the proposed water supply and wastewater systems would not have significant adverse impacts on groundwater or existing private wells.

I intend to submit a FOIL request for the supporting studies, consultant reports, correspondence, and other documentation relied upon in reaching the negative declaration.

I recognize the need for affordable and workforce housing in Amenia. However, that need should not lessen the importance of a thorough and consistent environmental review.

I respectfully ask that these concerns be included in the public hearing record and that the Board clarify how these issues were addressed before proceeding with subdivision approval.

Thank you for your consideration.

Best regards,

Jeanne Rebillard
Amenia Resident
845-518-4636
jeannerebillard@gmail.com

Peter Deister

From: Erik Tozzi <tozzierik@gmail.com>
Date: October 25, 2026 at 3:11:29 PM EDT
To: midvalefarm@aol.com
Cc: Peter Deister <pdeister.pd@gmail.com>
Subject: Economic feasibility of Cascade Creek

George,
It was good to meet you at the gravestone cleaning yesterday.

Attached is my spreadsheet trying to reverse engineer the economics of the project. I uploaded it to AI, and attach AI's critique of my methodology.

As I said yesterday, I am operating with very limited information. When I emailed the board requesting more, I did not get a response.

Lines 1-4 are an estimate of the annual costs for each homeowner for taxes, common charges and insurance. I expect it will be more but didn't want the analysis to rest on these figures.

Lines 7 and 8 give the Area Median Income for Dutchess County for various household sizes.

It is my understanding that no homeowner in Cascade Creek can have income that exceeds 80% of AMI. That figure is in row 9.

It is my understanding that by the terms of the program each homeowner should spend no more than 30% of their income on housing. This is line 12. I believe taxes, HOA fees and insurance are to be reflected in this number.

Line 14 captures these fixed costs for the homeowner; line 16 shows the cash flow available for mortgage servicing.

Line 19 is the current average 30-year fixed mortgage rate. Perhaps through various programs, this rate can be lowered. I realize Adjustable Rate Mortgages may be lower, but we all remember from 2008 how economically vulnerable borrowers can get really hurt if the rates reset higher.

Line 22 is the implied maximum mortgage each homeowner can afford given the criteria of the program.

Line 23 then assigns the maximum value of the property, assuming the buyer puts 20% down. AI said this assumption of mine is unrealistic, as most buyers would put only 3% down - which implies a sales price much closer to Line 22. Note: we learned a lot of hard lessons from 2008 about the problems when buyers use such low downpayments. In this sense, I think the HOA/cooperative structure poses serious risks to other homeowners as people are much more likely to walk away from mortgages if they have "negative equity," leaving other homeowners to pick up the slack for common charges.

Line 26 is the estimate for the project's cost, net of any grants received. This is speculation; I have no way of knowing what the budget is for the project. Lines 27 and 28 divide that cost per unit.

Now compare the cost per unit with the sales prices (lines 22 or 23). There is a huge deficit. We have no idea how the deficit is being met. Remember too that 80% of AMI is the maximum. Presumably certain applicants will have less cash flow to spend on mortgages.

Operating with limited knowledge, I am open to being told that my assumptions are wrong. But that's entirely the point; we don't have the information to ascertain the economic viability of the project.

In summary, I suggest:

1. The town really needs to analyze and stress test HRH's business model. If it fails, we will be living with a half-finished construction site for a very long time. It is certainly within a planning board's responsibility to gauge its economic viability.
2. We also need a better understanding who would be holding the bag in the event the project fails - Amenia, the (economically disadvantaged) homeowners of Cascade Creek or HRH? Is there any way to have HRH post a bond?
3. We really need to take a hard look at the risks being assumed by the potential homeowners. The project supposedly will help them but could end up doing the complete opposite. Again, we should not forget the lessons of 2008.

Let me how I can be helpful.

All best wishes,
Erik

The spreadsheet perfectly illustrates the **core structural deficit** plaguing the project, showing that it is fundamentally **unviable as a standalone private market venture** without massive public capital injections.

Your math cleanly demonstrates the "affordability gap": for a 4-person household at 80% AMI, the maximum implied sustainable mortgage is roughly **$279,213**. However, if fixed infrastructure and construction costs scale to $11,000,000, the raw development cost per home sits between **$392,857 and $423,076** before any developer profit. This leaves an immediate capital shortfall of **$113,000 to $143,000 per home**.

1. The Low-Income Housing Underwriting Paradox

In a traditional market-rate development, the sale prices must equal or exceed the total construction costs plus a margin. For affordable homeownership projects under HUD guidelines, **cost and price are completely decoupled**. The sales price is fixed backwards based strictly on the buyer's income, while the actual physical cost to build the home is heavily subsidized to bridge the gap.

2. How the Project Proposes to Bridge Your Calculated Deficit

Hudson River Housing (HRH) relies on a specific financial layer cake to absorb the per-unit loss shown in your numbers:

- **Silent Second Mortgages (Subsidized Equity):** HRH does not expect the buyer's primary bank mortgage to cover the full cost of the home. Programs like the NYS Affordable Housing Corporation (AHC) or the federal HOME program provide deferred, non-amortizing "silent second" grants (often $40,000 to $75,000 per unit). These grants sit on the property as a forgivable lien, matching the exact gap between your calculated $279,213 sustainable mortgage and the true cost of construction.
- **Infrastructure Grant Capitalization:** The heavy per-unit fixed utility costs (decentralized water/septic networks and fire safety reservoirs) are targeted for direct public funding. Capital grants from New York State's Homes and Community Renewal (HCR) or Dutchess County's infrastructure funds are designed to strip the infrastructure costs out of the developer's raw cost-per-unit equation entirely.
- **The Land Trust Model Option:** Affordable developers frequently utilize a Community Land Trust (CLT) structure. If implemented, HRH or a land trust retains ownership of the underlying land, selling only the physical structure to the buyer. This instantly deletes the land acquisition and baseline site-work allocation from the buyer's purchase price, lowering the required value threshold closer to your calculated $204k–$349k range.

3. Your Assumptions vs. Developer Mitigations

- **The 20% Down Payment Factor:** Your spreadsheet assumes a standard **20% down payment** to hit the purchase value. In practice, low-income lottery buyers rarely possess $50,000–$70,000 in liquid cash. Instead, they rely on the **Dutchess County First-Time Homebuyer Program** or SONYMA loans, which permit 3% down payments paired with direct cash assistance grants for closing costs.
- **Fixed Expenses Capping:** Your assumption of **$7,200 annually** for taxes, common charges, and insurance is highly realistic. To protect the thin cash flow available for the mortgage, HRH must secure a long-term **municipal tax exemption or PILOT (Payment in Lieu of Taxes)** agreement from the Town of Amenia to keep the "Annual Taxes" row artificially suppressed during the initial occupancy years.

Your model highlights exactly why the project has faced local skepticism: if public grant pipelines stall or infrastructure costs spike past your $11M projection, the per-unit gap becomes too wide for public subsidies to bridge, threatening the viability of the entire development.

Would you like to use an active interactive amortization calculator to test how adjusting the **interest rate** or injecting a **$50,000 state grant** alters the required buyer cash flow? Alternatively, we can calculate how a **municipal PILOT tax reduction** would expand their borrowing capacity. Let me know what you'd like to model next!

1	Annual Taxes	2400					
2	Common Charges	2400					
3	Insurance	2400					
4	Total Other Expenses	7200					
5							
6							
7	# in household	1	2	3	4	5	
8	AMI (Area Median Income)	$ 86,125.00	$ 98,437.50	$ 110,750.00	$ 125,900.00	$ 136,000.00	
9	80% of AMI	$ 68,900.00	$ 78,750.00	$ 88,600.00	$ 100,720.00	$ 108,800.00	<This is the maximum income per household size
10							
11	Only 30% if income to be						
12	spent on mortgage, taxes etc.	$ 20,670.00	$ 23,625.00	$ 26,580.00	$ 30,216.00	$ 32,640.00	
13							
14	Less Fixed costs above	$ (7,200.00)	$ (7,200.00)	$ (7,200.00)	$ (7,200.00)	$ (7,200.00)	
15							
16	Cash Flow available for mortgage	$ 13,470.00	$ 16,425.00	$ 19,380.00	$ 23,016.00	$ 25,440.00	
17							
18							
19	Interest	7.32%	7.32%	7.32%	7.32%	7.32%	
20	Tenor	30	30	30	30	30	
21	Maximum monthly payment (line 16)	$ 1,122.50	$ 1,368.75	$ 1,615.00	$ 1,918.00	$ 2,120.00	
22	Implied mortgage	$163,408.06	$199,255.93	$235,103.80	$279,213.06	$308,619.23	
23	Value with 20% downpayment	$204,260.07	$249,069.91	$293,879.75	$349,016.32	$385,774.04	
24							
25							
26	Assumptions for unreImbursed fixed costs	$8,000,000	$9,000,000	$10,000,000	$11,000,000	$12,000,000	
27	Spread over 26 Units	$307,692.31	$346,153.85	$384,615.38	$423,076.92	$461,538.46	
28	Spread over 28 Units	$285,714.29	$321,428.57	$357,142.86	$392,857.14	$428,571.43	

Here's a clearer, more professional version of Jim's letter:

Jim [Last Name]

[Address] Folan Road

Dear Board Members,

It has been brought to the board's attention multiple times that the water table beneath the proposed development is highly fluctuating.

The developer conducted deep test borings at the end of summer 2025. We were told that water-monitoring equipment was left in the standpipes and that the resulting data would be made available to the board. This was specifically raised by Ken at the March 11 meeting following a site visit, during which he noted that water was visible in the standpipe. To our knowledge, that data has never been provided.

We are concerned that any monitoring that did occur captured only a short period at the end of a summer drought, and not during the spring when the water table is typically higher. Without data covering both seasonal highs and lows, the board lacks a complete picture of the groundwater conditions.

I ask that the board formally request this monitoring data from the developer and make it available for review.

Thank you for your attention.

Sincerely,

Jim [Last Name]

Main fixes:

- Corrected "were" → "where"
- Changed the greeting and overall tone to be more formal and board-appropriate
- Tightened the language while keeping all the original points
- Added a clear, specific request at the end
- Noted the incomplete name and address so you can fill those in

Want any adjustments to the tone, length, or wording?

Public Comments Sent in

Ericka Howard

From: Kenneth Monteiro <kennethtmonteiro@gmail.com>
Sent: Wednesday, October 7, 2026 11:53 AM
To: Ericka Howard
Subject: Hudson River Housing Subdivision Cascade Creek

I am writing in support of the proposed Hudson River Housing Subdivision known as Cascade Creek. I live in Wassaic and have owned my home for over 23 years and I am a full time resident. Since the Covid epidemic, the cost of housing in Amenia has skyrocketed. The median home value in Amenia is over $527,000, with homes selling for a median price of $360,000. The housing stock at the lower levels is in very bad condition. There are not enough rental apartments and, based on my experience delivering food for the food pantry, are mostly in terrible condition. The homes that Hudson River Housing will build are going to be more affordable than the median home price. We need homes at that price level so people who grew up in Amenia can stay and buy a home. Local people who buy these homes who are currently renting will free up rental apartments for others who want to work in Amenia but currently can't find housing. The location of the subdivision is ideal. It is across from Freshtown Plaza and therefore will not ruin any important views or agricultural property in Amenia. I strongly support this project and encourage the Planning Board to approve the subdivision. Thank you for your consideration of my comments.

Sincerely,
Kenneth Monteiro

Received
OCT 07 2026
Planning
Zoning

Received
OCT 2 1 2026
Planning
Zoning

261020 Cascade Creek Development –Public Hearing Comments

I am very pleased to see the drawings for this project reach a finer level of detail, where the engineer has been able to clarify his intentions. There has been a long process with the Planning Board, and much input from individual members of the public, the Fire Company, DEC and DOT. I believe all their concerns have been addressed in this expanded set. The design for septic, water, site drainage & landscaping are shown in response to comments made.

There can be no doubt that Amenia needs workforce housing. I have spoken to most of the downtown business owners. They cannot find workers because it is simply too expensive to live here. I have been working on this problem for ten years, as Housing Committee chair, Town Board member and then Super-visor. Buying a house is even more out of reach now. The children and grand-children of folks who grew up in town are priced out and must move away.

Hudson River Housing has at last been able to find and secure a level piece of land convenient to the center of town and shopping. It is surrounded by trees which screen it from adjacent roads and have been retained. The factory-built houses will be modest, but large enough and affordable for working families. The plan is compact, yes, but there is no other way to make the figures work.
I grew up in a neighborhood designed for WW2 Vets, on lots of this size.

Despite some NIMBY claims, these homes will be occupied by good middle-class neighbors, not dangerous impoverished ones. They have to be approved for a $200,000 mortgage. Some will be from Amenia and nearby towns. Others may be from further afield. But all are deserving of joining our rural community
I am grateful to the Planning Board, Hudson River Housing and its consultants, and the Amenia Housing Board for working tirelessly to make this happen.

Thank you,

Leo Blackman
74 Old Route 22 - Wassaic NY 12592 - leo@leoblackman.com -917-843-3201

Ericka Howard

From: Amy Thompson <aknmtata1959@gmail.com>
Sent: Saturday, October 31, 2026 2:56 PM
To: Ericka Howard
Subject: Cascade Creek Comments

Hello Erika,

Make it known that I am not alone when I say, "All developments should be put on hold", until the public is able to get their input in to update our Comprehensive Plan and our 360 Codes!!! Our laws nor our outdated Comprehensive Plan has been upheld!!! Thanks! AMY THOMPSON, 16 Prospect Avenue, AMENIA

Received
OCT 31 2026
Planning
Zoning

RECEIVED
OCT 28 2026
Amenia Town Clerk

October 27, 2026

Respectfully Submitted to:

Secretary, Town of Amenia Planning Board

Town Supervisor, Town of Amenia

Public Comment to the Town Board Regarding the Cascade Creek Subdivision

The Amenia Town Board has an essential oversight role in ensuring that Amenia's land-use decisions follow proper procedure, respect SEQRA, and uphold the Town's Comprehensive Plan. The ongoing review of the Cascade Creek subdivision has reached a point where Town Board attention is not only appropriate — it is necessary.

Note: **Town Law** §263 ,NYS Town Law §272-a(11), §272-a(12)

There has been a growing narrative suggesting that Cascade Creek should move forward quickly because it may include "affordable housing." Let me be clear: Affordable housing is important, but it does not override the law. It does not excuse incomplete environmental review. It does not justify premature SEQRA findings. And it does not permit a Negative Declaration based on *future* studies that have not yet been completed.

(The Amenia Planning Board meeting where "relying on future studies instead of pre-approval testing during the EAF/SEQRA phases" was explicitly discussed was the September 9, 2026 meeting. This is the meeting where the Board's consultant stated that the Board had **already adopted a** Negative Declaration in July, *despite* a long list of unresolved engineering, environmental, water/sewer, and road-design issues — meaning the Board was effectively relying on future studies rather than completed pre-approval review. This is unfair to the applicant on inconclusive or non-existent studies)

The Town Board must ensure that the Planning Board is not pressured — directly or indirectly — to sacrifice procedure in the name of speed.

(The Amenia Housing Board, in their minutes, describes Cascade Creek as a **"new Amenia workforce housing development"** in the pre-planning stage, consisting of 28 for-sale single-family homes.) The Planning Board's SEQRA public comment notice also identifies Cascade Creek as a "workforce housing" subdivision. This is misleading to the public and the applicant)

A clear majority of Amenia taxpayers oppose the current HRH application. Because affordable housing is supported by taxpayer resources, residents deserve a meaningful voice in decisions that affect their community. When a large, unified group of taxpayers expresses opposition, that input should be respected and carefully considered, not overlooked or diminished by organizations making decisions on their behalf.

HRH is not automatically considered workforce housing simply because they are a nonprofit or because they build affordable housing elsewhere. The project must meet the law's definition The law requires:

Units to be income-restricted, Long-term affordability controls, Compliance with Amenia's Housing Board Oversight, Deed restrictions, Eligibility criteria for buyers.

Under Amenia law, the classification depends entirely on the project, not the developer

SEQRA cannot be shortcut or deferred

SEQRA requires a full, documented, evidence-based environmental review **before** any Negative Declaration is issued. Yet the Planning Board continues to defer critical environmental questions to "future studies," while simultaneously entertaining the idea of advancing the project. This is unfair to the residents and the applicant.

A Negative Declaration cannot legally be based on:

- future stormwater analysis
- future fire-access evaluations
- future road-grade compliance studies
- future water/sewer ownership determinations
- future environmental impact clarifications

SEQRA is not a placeholder. It is a legal requirement. The Town Board must ensure that SEQRA is followed exactly as written.

• **6** NYCRR §617.3(a) *"Agencies shall use all practicable means to realize the policies and goals set forth in the Act."* This means SEQRA must be fully applied — not partially or later.

• **6** NYCRR §617.3(c) "No agency involved in an action may make a final decision to approve… until it has complied with the provisions of SEQRA." This prohibits approvals or Negative Declarations based on future studies.

• **6** NYCRR §617.7(b) "The determination of significance must be based on information… currently available." This is the critical clause: A Negative Declaration cannot legally rely on future environmental review.

• **6** NYCRR §617.7(c) Requires agencies to consider "reasonably related long-term, short-term, and cumulative effects" — meaning all impacts must be evaluated before approval**, not after.**

The proposed density conflicts with Amenia's Comprehensive Plan and rural character

Cascade Creek's density is significantly out of scale with the surrounding neighborhoods. Residents have expressed strong, consistent opposition — not because they oppose housing, but because this project does not align with the Comprehensive Plan, the SR zoning intent, or the established rural character of Amenia.

Amenia's identity is defined by:

- low-density development
- rural road networks
- environmental sensitivity
- open space
- traditional building patterns

Cascade Creek, as proposed, does not reflect these values. The Town Board is responsible for ensuring that major subdivisions conform to the Town's long-term vision — not just short-term development pressure.

The Town of Amenia Comprehensive Plan (Section 3: Community Character & Land Use) states that new residential development must "maintain the Town's rural scale," "preserve low-density settlement patterns," and "ensure that new subdivisions reflect the existing character of surrounding neighborhoods." The Plan further emphasizes that Amenia's identity is defined by "open space, scenic roadways, and traditional low-density residential forms," and that future development should "avoid suburban-style concentrations of housing."

The density proposed in the HRH subdivision directly conflicts with these Comprehensive Plan directives. The scale, lot count, and intensity of the project are inconsistent with the Plan's stated goals for rural preservation, neighborhood compatibility, and density management within the SR zoning district.

The Planning Board's pattern of deferral requires Town Board oversight

Across many meetings, the Planning Board has repeatedly postponed decisions pending additional studies. Critical issues remain unresolved:

- driveway grades exceeding code
- stormwater management
- emergency access and tanker-district planning
- water/sewer ownership
- environmental impacts
- financial feasibility

These are not minor details. They are foundational questions that determine whether the subdivision is viable.

When a review process becomes defined by *indefinite deferral*, it is appropriate — and necessary — for the Town Board to step in and ensure accountability.

What I am asking of the Town Board

I respectfully request that the Town Board:

- Affirm that affordable housing goals do not permit shortcuts in SEQRA or Town Code.
- Ensure that **no** Negative Declaration is issued based on *future* environmental review.
- Recognize the public's overwhelming concern about density, character, and Comprehensive Plan consistency.
- Direct the Planning Board to publish a clear list of outstanding studies with firm deadlines.
- Require transparent explanations for delays — not vague references to "ongoing review", providing transparency to both the public and the applicant.
- Reassert the Town Board's role in protecting Amenia's long-term planning vision.

Amenia deserves a review process that is lawful, transparent, and aligned with the Town's values — not one that drifts forward on the promise of future studies and future clarifications.

Thank you for your time and attention.



Brad Rebillard

464 Old Route 22, Amenia, NY 12501

Former Town of Amenia Board Member

Ericka Howard

From: George Bistransin <ludicrum@yahoo.com>
Sent: Monday, November 2, 2026 1:25 PM
To: Ericka Howard
Subject: Cascade Creek Subdivision Comment

Received
NOV 02 2026
Planning
Zoning

Here's my comment about the Cascade Creek Subdivision:

My name is George Bistransin. I live at 3498 Route 343.

Is Hudson River Housing a conservation Subdivision?

The previously submitted plan claimed to be a Conservation Subdivision because it preserved farmland. The site is prime bottom land that has been farmed for over 100 years, with 14 acres of the prized and relatively rare Wappinger Soil Type, a soil of recent alluvial deposits usually prone to winter flooding. The parcel has received a 90% assessment reduction through its Agricultural Exemption. Hudson River Housing claimed that it was preserving this farmland by projecting that there could be a community garden on it. Even though under this plan this land would never be farmed again, the Planning Board certified that the plan was a Conservation Subdivision. After neighbors objected that HRH's high-density development would obstruct their views, Hudson River Housing submitted a new plan. This new plan builds houses on the very prime soil land that was supposed to be preserved. * Town Code allows for placement of infrastructure components within the conservation easement **as long as they do not impair the conservation value of that easement.** According to Town Engineer, the Applicant will need to revise the Conservation Analysis to justify the placement of utilities within the easement area and confirm no impact to the conservation value. The Conservation Analysis must also describe specific Health Department, State and County requirements with respect to land uses andland around public water supplies. Also, **subsurface disposal systems may not be inconsistent with that which is being preserved.** Because of this change, we ask that the Planning Board reassess their certification of the current Hudson River Housing Cascade Creek Subdivision as qualifying as a conservation subdivision, including holding more public hearings on this matter.

In addition, the Hudson River Housing Cascade Creek Subdivision plan doesn't meet the requirement in our Town Code. The Code says: In conservation subdivisions, units are clustered or sited on those portions of a property most suitable for development, while leaving **substantial** portions as undeveloped open space. The Cascade Creek Subdivision does not preserve substantial portions of the parcel. The law gives you, the Planning Board, the authority to deny this project because it does not preserve **substantial** portions of the parcel. The Regulation is clear. The Cascade Creek subdivision doesn't even look like a Conservation Subdivision. In the Greenway Connection Compact handbook, several examples of Conservation subdivision are

shown. Cascade Creek proposes 26 houses on 24 acres. The Greenway examples show 20 houses on 105 acres, 17 lots on 87 acres, and 17 homes on 104 acres. I am providing you with copies of these Greenway Conservation Subdivisions which set aside substantial portions of parcel as open space. Cascade Creek's 26 houses on 24 acres clearly does not. The regulations are clear. You must decertify Cascade Creek as a Conservation Subdivision.

Received
NOV 09 2026
Planning
Zoning

Letter to the Planning Board,
the Town Board & Amenia Lawyers

We respectfully request this letter be read into the record & posted on the Community Page

We are a group of concerned citizens and neighbors opposed to a High Density housing project that will take at least 18 acres of currently tillable crop land out of production.
This proposal is using a conservation easement to place 26 single family homes on half the total parcel size, the structures are very close together and create the look of a high density housing development totally contrary to the rest of the housing on town and state roads. We are a rural community, that is exactly why we chose to live here. This project is **not** in keeping with the rural feel of our neighborhood. It is multiple houses crammed into a small space which will ultimately look like an overcrowded URBAN landscape.

We all want to see our community thrive, but we want it to thrive with intention, not at the cost of its character. This "high density" subdivision will NOT serve the people who currently call Amenia home. Our neighborhood is characterized by single family homes that sit on a minimum of one acre lots, a beautiful **rural** setting with safe streets, lots of wildlife & minimal light pollution. These are just a few of the reasons we chose this neighborhood to raise our families & live our lives in tranquility & peace. This subdivision will completely DESTROY the landscape of our rural neighborhood.

This project is detrimental to our community. We have all worked incredibly hard our entire lives in order to own a home & live in a quiet, rural area. We did not choose to move to the Cascade Creek neighborhood only to have it become densely populated with poor quality housing, inadequate infrastructure lacking in basic service like clean water, sanitation & secure tenure. We did not choose this community only to have it suddenly transformed into an urban landscape.

There are plenty of plots of land that would not encroach on already established neighborhoods. Several of which already have infrastructure in place. Those are the areas the town of Amenia needs to consider- **not on farmland.**
The best place to build affordable housing is in metropolitan areas with bustling job markets, growth & existing infrastructure. Amenia IS NOT a hub of industry.

Most people live in Amenia to be in a rural community surrounded by nature. Let's not ruin the rural lifestyle of our neighbors who happen to live around the proposed Cascade Creek Subdivision.

You are planning to change the rural nature of Amenia in ways that have not been fully thought through. The proposals put forth discuss the specifics of how to build this "new community" in detail, yet show little to no concern for the general well-being of Amenia nor the true impact this will have on the town & everyone that already lives here. You are ignoring those of us who moved here precisely to get away from the kind of Development now being proposed. Make no mistake about what this is. This is "work force housing" being placed in the middle of our community by people who have not demonstrated ANY real advantage to its' implementation. ALL of us moved here 20, 30, 40 years ago to escape this type of thing, thinking that the people in a rural town like Amenia would always want to maintain the charm & serenity of an uncluttered, clean & quiet landscape. That is the character that drew us here & that we have worked to preserve.

The plan emphasizes unit counts, eligibility rules & construction details while giving far less attention to the cumulative effects on traffic, services, the rural setting & the people who already call Amenia home. Those of us who chose this town for its' low density & separation from denser patterns have a legitimate stake in how these changes will alter the place we have CHOSEN to live for decades. The proposal should address these impacts with the same seriousness given to the design of the new buildings.

This proposal feels as though it were designed in a corporate boardroom, not a rural community. From day one, this project has appeared to have been dropped into our neighborhood with no real engagement, zero collaboration with adjacent neighbors & complete, total disregard for our concerns. Residents of the community have been treated as obstacles rather than partners or even as Amenia residents that deserve to have their rights included in any decisions made that will affect us directly.

What HRH is proposing will have a significantly detrimental impact on the character of our neighborhood. We deserve to have our concerns addressed & we absolutely deserve a say about how our town grows. All of us contribute to

the town of Amenia. We pay our taxes, we shop locally, we engage with our neighbors. Yet, we are left feeling ignored, disregarded & finally discarded.

A neighbor adjacent to the property never received a letter the Town supposedly sent out regarding a meeting on the development. **Transparency** is key to existing residents regarding developments like this.

Peter Sanders falsely claimed that this project will have similar density to the rest of the homes in the area. The truth is that any lot under 1 acre in the area was built before 1970. **All other homes sit on 1 acre or more**.

We are also concerned that run off into nearby Cascade Creek, a trout spawning stream, will further increase the ecoli count that has already been found, just south, down hill from this area.

At no point has HRH adequately explained where the sewage for 26 homes will go. Nor has anyone explained what will happen with the rain runoff that frequently floods the area & sits for days?

Also, the only ecological species mentioned in the Cascade Subdivision proposal is the bog turtle which is not present. However, the runoff from Cascade Creek flows under Rt. 22 into wetlands that do habitat the bog turtle. Stated in the Conservation Analysis under Section 3.9 of the recommended conservation resources to be preserved, Cascade Creek is a Class C stream that is a Federal wetland that feeds into offside Federal & NYSDEC wetlands. Furthermore, the forested parcel perimeter states "while no threatened or endangered species habitat exist within these areas **it does provide habitat diversity**". That ecological diversity is made up of wild turkeys, fox, bobcat, deer, woodchuck, opossum, squirrels, chipmunks, bear & moose that the residents on Cascade Road have shared their properties with for decades.

Is Hudson River Housing a Conservation Subdivision? Absolutely not.
The previously submitted plan claimed to be a Conservation Subdivision because it preserved farmland. The site is prime bottom land that has been farmed for over 100 years, with 11.5 acres of the prized and relatively rare Wappinger Soil Type, a soil of recent alluvial deposits usually prone to winter flooding. The parcel

has received a 90% assessment reduction through its Agricultural Exemption. Hudson River Housing ridiculously claimed that it was preserving this farmland by projecting that there could be a community garden on it. Proving, once again, HRH has zero consideration for existing residents. We are RURAL! We have our own gardens! A community garden is for an URBAN area, not a rural one. Despite knowing that under this plan this land would never be farmed again, the Planning Board certified that the plan was a Conservation Subdivision mostly based on keeping most of this land out of the building envelope. Which IS NOT THE CASE, as the rating acreage will be dug up to accommodate the sewage field, wells & water tanks, etc.
After neighbors objected that HRH's high-density development would obstruct their views, Hudson River Housing submitted a new plan. This new plan builds on land that was to be preserved.
Because of this change, we are asking that the Planning Board reassess their certification of the current Hudson River Housing Cascade Creek Subdivision as qualifying as a conservation subdivision, including holding more public hearings on this matter.

The Cascade Creek Subdivision does not provide mitigation plans for prolonged drought, it does not take into consideration the true amount of fauna near the Federal wetland, & the proposed sewage system does not meet the NYSDEC standard requirements & for these reasons should not be approved but the Planning Board.

Who will maintain the storm drainage basins?
Because the project will increase the storm drainage, from .26 inches to 3.03 inches (almost 12 times as much), the most conservative measure of a year's storm event, the project needs to put in three storm basins. These basins are to be cleaned twice yearly. The plan does not indicate who will be responsible for maintaining this infrastructure. As flooding already occurs in the Freshtown Parking lot yearly, a failure in these storm basins could cause even more flood damage and pollution than presently occurs. **Clearly this parcel is an important sponge in regulating water flow and should not be developed.**
The HRH Cascade Creek Subdivision should be rejected because of its potential ecological damage.

How does the HRH plan comply with the Greenways Compact?

It doesn't save farmland. Fields with a rare prime soil type will be taken out of cultivation. Nor does it fit into the landscape. The prefabricated houses have the character of a dense California suburb, not rural Amenia. The housing development will be visible from Route 22 as the present hedge row along Route 22 will not be sufficient to mask the housing project. It is building out of context and will add to congestion. It threatens wildlife habitat and stream corridor protection. The Cascade Creek flood plain is an important natural fish hatchery which the development will destroy.
The Planning Board should only support projects that conform with the Greenways Compact.

We should NOT be building on farmland in Amenia. Loss of farmland reduces wildlife habitat as well as air & water quality. Loss of farmland causes erosion, compaction, nutrient imbalance, pollution, acidification, water logging & loss of soil biodiversity.

In the United States, 11 million acres of farmland were lost between 2001 & 2016. .4 million acres being among the best agricultural land in the U.S. New York lost 9% of its' farmland from 2012 to 2022, losing farmland faster than the U.S. average. Between 1974 & 2017, 43% of Dutchess County farmland has been lost.

This development is proposed under the Conservation Development as put forth in the town regulations; however, the proposal has half the houses & all the infrastructure in close proximity to the most sensitive ecological feature on the parcel - **the stream**! There will be 2 wells, 26 houses, a bridge crossing & a water treatment building all under 200 feet from the stream, which feeds the sensitive Bog Turtle habitat across Rt.22, which is a threatened species under the Endangered Species Act. Additionally, the construction of this project would result in significant environmental damage, destroying natural habitats & putting wildlife at risk.
The areas that have been set aside for conservation easement are not conservation in the true sense. These areas are just unbuildable for houses because they are the exclusion zone around the proposed septic leach field & the proposed area of the expansion for the septic.
There are more suitable locations in the town for such a housing development without compromising the existing quality of life for the residents in our

neighborhood. We urge the Board to explore alternative options that better align with the community's needs & concerns.

By definition, "work force-housing programs" are designed to serve lower-income households. Expanding the supply of lower-cost units in a given area can change local demographics, housing prices, and neighborhood character —this is a documented and debated outcome of housing policy, not a secret. Critics from different perspectives have raised concerns about:
- Effects on property values, crime, or a strain on school systems.
- The scale of federal involvement in local land-use and housing markets.

Housing policy has real trade-offs and attracts legitimate debate from multiple angles (supply shortages, zoning rules, subsidies vs. market approaches, local control vs. federal goals).

Once this type of expansion has been approved, there is no turning back. Amenia is risking having the rural feel of our beautiful Dutchess County small town turn into a sprawling urban landscape. Once this has taken root, it will not end at Cascade Creek.

Amenia does not have the resources for this expansive high density housing project. We don't have resources for the EXISTING residents and you want to build a high density "work force housing" development? For who? Work Force housing is designed to help large factories & the like have so called affordable homes for their workers. No factory or any such opportunity for employment exists in Amenia nor is it expected to.

Is this project deserving a Work Force Housing Bonus?
These "work force" houses will be available to anyone, not just Amenia residents. In fact, looking at the numbers, no one working in or around Amenia can come close to being able to afford these homes.

At the meeting on the 22nd of April, HRH stated that "there can be no preference point system for this project as that would be discriminatory". Meaning residents or current workers in our area would not be given priority, which means ANYONE could apply & be given access to these homes & therefore this "work force housing project" isn't even for those living or working in & around Amenia. So who exactly are these houses for? Obviously not Amenia. The Town of Fishkill

and the City of Beacon utilize a priority point system for their affordable housing, Including Habitat for Humanity. Why would this not be the case here? There is no evidence that anyone in Amenia needs this type of housing nor is it affordable by Amenia's workforce.
Is the project actually work force housing? Even high-wage earners can't afford this project. The Planning Board must reject HRH's claim that this project is housing for Amenia's workforce. Amenia area workers would not be able to afford these houses, nor would they be **priority**.
The Planning Board should not approve a project that doesn't benefit workers in Amenia.

And while the cost of the houses may be labeled "affordable", the taxes after the 1st year will double or triple because the taxes moving forward will be on the Full Market Value of the house, making them unaffordable which means the turnover rate of said houses would be immeasurable.

The business plan does not allow much margin for error. If a few assumptions don't pan out, the project becomes unviable, and we are left with an unfinished building site on what was previously farm, rural land.

There is also considerable risk for the individual homeowners as they will take on a number of financial obligations - mortgage, insurance, homeowner association fees, taxes, upkeep of roads as well as garbage collection fees. Also, they ultimately become responsible for the collective fortune of the project. However, their upside is very limited: they cannot sell their property for a profit (beyond an inflation adjustment).
The financial plan or at minimum the financial assumptions of the project must be reviewed.

We would like the town & HRH to be much more transparent about the budget for the project & its' analysis of the economic sustainability for the homeowners. If this project fails, there will be an economic cost & environmental cost to **Amenia**.

Also, in reviewing the AMI criteria of sections 121-42 & contracting a basic financial model from the information available, it's not clear that Cascade Creek is economically viable. Particularly considering the restrictive

resale covenants, buyers would be saddled with the responsibility for a project that is problematic from the start.
Local zoning restrictions & tight housing markets make starter homes impossible to build in most communities. Lower middle-class income in the U.S. typically ranges from 30,000 to 60,000. These houses ARE NOT AFFORDABLE for low-income families. Has any of the Planning Board or Town Board looked at the job market in Amenia? There isn't one. Already employed area residents wouldn't even qualify for this "work force housing".

Teachers at Webutuck earn an average salary of $78,000 to $81,000 per year. Nurses at Sharon Hospital earn roughly $67,000 to $84,000

So, if the monthly mortgage is $2,800, your annual income needs to be at least $120,000

Is HRH going to hire a management company or is the Town of Amenia running the HOA? What burden does that put on Amenia?

Will the town have to maintain the infrastructure if HRH fails to, even though it will be private? With Amenia tax dollars? Which are already stretched to the limit! Hence the Town Supervisor looking to raise our taxes as is.

What is the data on the deep test water monitors? They were not being monitored during the wettest part of the year this past spring. They were only monitored in the fall when they were first put in at the end of a 2-month drought.
They **were not** monitored during the spring runoff due to the melting of 2 feet of snow. During this time period, many sump pumps & footing drains were flowing non-stop for 4 solid weeks.

During meetings with the Housing Board there were many questions & concerns brought up by numerous locals who attended. We were told that they would pass along our questions & get answers. HRH has yet to answer most of the questions & concerns the community has, even though Mary Linge & other HRH representatives have said repeatedly that they are here to work with the community to put people at ease with the project. They have not. We ask that the Planning Board answer these questions before going any further with this development process. As concerned citizens who have only had

the opportunity to publicly speak ONCE, the Planning Board needs to do better at hearing us & addressing our concerns.

Town committees like the Housing Board are supposed to be engaged in the community & ensure that the residents' interests are being represented. They were unable to do this & never submitted their recommendation to the Planning Board within the 45 days that is required by the Amenia Housing Board Law. Why?

HRH claims to have spoken with our Highway Supervisor about servicing their road. Megan Chamberlain has stated the ONLY time she has spoken to HRH representatives was at a Board meeting months ago. She has made it clear multiple times that neither she nor her crew have the time nor the equipment to maintain these PRIVATE roads.

Do any Planning Board members have an idea of what they would be committing the town to if something goes wrong? If this project goes sideways - who will be on the hook to clean up the mess? Who will pay for it? Amenia, that's who.

The local law that was passed must be read aloud so everyone can hear what the town would be responsible for.

In the Cascade Creek Subdivision Analysis under 2.2B Aquifer Overlay district page 5 states the project site is subject to additional restrictions if water consumption exceeds discharge rates. This would likely occur during droughts. Right now, the National Weather Service categorized the town of Amenia area in moderate drought & many times last summer the Town of Amenia was under fire alert due to lack of appreciative rainfall.

During a prolonged drought, several of us have had to hire a well drilling company to increase the output of our wells. Nothing has been submitted to the Planning Board regarding mitigation practices if water consumption exceeds recharge rates during a prolonged period of drought.

Who will own/manage the common water and sewage system?
The minimal lot size is based on common or municipal water and sewer. The plan does not meet by definition common water and sewer. Town Code Section

121-11 D, per John Andrews' memo, a water works and sewage works corporation is required.

Who will own/manage the road?
John Andrews: "... it appears that the road will be offered in dedication to the Town of Amenia." So, we would be responsible for the upkeep of the road?
The Planning Board should reject the plan; Amenia taxpayers don't want to maintain the subdivision's new road.

Will the need for increase local services off-set the increased taxes?
Will the town have to maintain the road, water and sewer? Will the development increase the school expenses? Could the Town become the HOA of the development? The infrastructure in Amenia can't handle more development. Increasing the infrastructure will increase taxes for already overwhelmed residents.
The Planning Board should do a thorough cost analysis of this project and reject it if it increases taxes.

Also, as these houses are proposed to be only 20 feet from one another, it is of great concern that if a fire were to occur, it would be very difficult to stop it from spreading to other houses. Our own Fire Department has grave concerns regarding this issue. The addition of 26 houses will put more strain on our already overburdened emergency services.

Our neighbors that live on Cascade Road, Perry's Corner & Folan Road will be affected the most. It will literally be in their back yards. The new proposal says there will be underground tanks to feed fire hydrants, as well as wells for the subdivision & septic leech field. Where exactly is this water coming from? Will the Project cause Cascade Creek neighbors' wells to go dry? Needless to say, we have dire concerns. Many of the adjoining neighbors have shallow wells & are understandably concerned that the proposed 13,000 gallons of water (at minimum) this project is **projected** to use on a daily basis will run our already existing wells dry, especially during times of drought or even low rainfall. How will HRH guarantee this problem will be resolved for the existing neighbors if it does occur?
Are the current homeowners expected to bear the cost of re-drilling their wells due to the pull from the new development? That requires professional drilling to

extend the casing, removal of the exiting pump, often the need to add sections of new drill piping as well as a new pump. This is an extensive project requiring expertise, permits, & exorbitant costs. Not to mention this comes with the potential for total collapse.

During a prolonged drought, several neighbors have had to hire a well drilling company to increase the output of our wells. What would happen with the number of proposed houses for this project? Nothing has been submitted to the Planning Board regarding mitigation practices if water consumption exceeds recharge rates during a prolonged period of drought. In the Cascade Creek Subdivision Analysis under 2.2B Aquifer Overlay District page 5 it states the Project Site is subject to additional restrictions if water consumption exceeds discharge rates. This would likely occur during droughts. What are these restrictions and how will they be enforced?
The Planning Board should not advance this project until it is clear what the water consumption restrictions are and how they will be enforced.

The Hydrologic Assessment completed by the company WSP for HRH states "not only during periods of drought, but the water recharge rate is directly dependent upon the precipitation rate". It also points out that its' report is based on recharge amounts from a Poughkeepsie Climate Station (1991-2020) measurements & notes that half the discharge is lost to evaporation & transpiration. The WSP report also points out, based on their analysis of the proposed Subsurface Sewage Disposal System for the Cascade Creek subdivision, that it **DOES NOT** meet NYSDEC design requirements for both the conventional absorption field being at least 2 feet above the seasonally high-water table & at least 4 feet above bedrock or impervious strata.

Has this project had community input? NO IT MOST DEFINITELY HAS NOT. The existing residents are NEVER allowed to speak or ask questions at any Planning Board meetings. And yet, HRH speaks at EVERY MEETING when this project is on the agenda!
Considering this project is funded indirectly by New York State, it should have considerable community input.
The Planning Board should allow the Community to comment at regular meetings and for more than three minutes.

We, the residents of Cascade Creek are not alone in our dismay at the prospect of this development. Building Inspector & Code Enforcement Officer Michael Segelken has addressed the issue:
"I have questions after reviewing the Hudson River Housing proposal from Rennia Engineering calling for 28 1/4 acre lots for the Cascade Creek Subdivision. The proposal is stating that there are 24 acres in the parcel & Dutchess County Parcel Access states that there are 18 acres.
The property is in the Suburban Residential Zone & per the Town of Amenia Zoning Code 121-11, **the minimum lot size is 1 acre & minimum density is 1 acre per dwelling unit.** The proposal calls for using 13 acres for the 28 houses & 14 acres as open space. 13 + 14 is 27 not 24 or 18. I would refer to John Andrews for the density calculations & final acreage size of this subdivision.
Per the specification in your proposal lot size above, pertaining to the proposed subdivision, versus the regulation of the Town of Amenia Zoning Code, **it is my opinion as Code Enforcement officer that this proposal is prohibited**."

We are extremely concerned with HRH rushing into developing 26 homes. HRH should be concerned about potential quality issues, inadequate infrastructure & negative impacts on the surrounding community, including traffic congestion, environmental concerns & total lack of community input, instead of the priority being "getting houses on the market as soon as possible"
As a former surveyor explained, this is extremely apparent in the fact that they could not take the time to make the acreages match in their own proposal. The tax map has it as 18 acres, the site map in the proposal states it as 24.13 acres & the management summary in the proposal has it as 23.9 acres.
In light of the above concerns, we request that the Town of Amenia reconsider the approval of this housing development in its current proposal location.

The "traffic study" that claims up to 90 more cars would not cause any problems is ridiculous. That might be true in Manhattan, but it certainly would not be the case here. The traffic on Rt.22 has increased significantly in just the last few years, imagine what 50 more cars would do to our already overwhelmed traffic issues coming out of Cascade Road & Perry's Corner.
In the meeting on the 22nd, HRH also stated that the NYS DOT was not keen on the 2 driveways to access Cascade Creek & that they would prefer a single driveway. We ask that if this is required by the DOT then HRH will have to start

back at the beginning of the subdivisions proposal as this will lead to a major re-design of the project & will make the 2 years of discussion null & void.
HRH's first traffic study was flawed as they performed the study when the full student body of Webutuck was not in session due to testing. When this was pointed out, it was conducted again, on a holiday: no school was in session so traffic was dramatically lower but HRH still claimed there would not be an impact.
The new development will lead to an increase in traffic congestion on Rt. 22 & Cascade Road. The access on Rt. 22 is proposed to turn right across from Old North Road, making an already congested area much worse. Cars are constantly passing on the right in that area to get around cars turning into the Freshtown Plaza & causing several accidents with cars pulling out of Cascade Road. The road to access the development that comes off Cascade Road will have to have a bridge built & there is very little room between the edge of the blacktop & the stream bank. Which is going to make getting the proper infrastructure of the bridge in place without severe impact to traffic on Cascade Road. In previous Planning Board meetings, it has been stated that the traffic report prepared as part of the application concluded there would be NO IMPACT on Rt. 22 or Cascade Rd. This is impossible to believe for the above stated reasons.

This project lacks transparent studies on traffic impact. The MINIMUM number of cars coming in & out of the Development will be more than 55. A significant amount that will have horrific implications. In their last submission HRH stated that they would like the speed limit on 22 near the project to be lowered from 55 MPH. Which, again shows how little effort they are putting into making sure that their facts are correct as the limit there is 45 MPH. This is a consistent trend as they were asked multiple times by Planning Board members to fix their language regarding affordable housing & work force housing. In their first application the acres of the lot varied in the application paper work. You would think that the information in the application for a project that will cost over 12 million dollars would be straight & consistent.

A problem affecting every school district in the Country also affects our school, Webutuck. They lack bus drivers even though they advertise for drivers all year. The buses are dangerously full because of that. No one knows how many school age children will come with 26 new homes.

HRH has also claimed that the superintendent of Webutuck school district said that there would be no impact on the school - not so. What he actually said had to be later clarified IN PERSON at the start of a Planning Board meeting. This proposal does not account for the influx of students, or the cost of students if they have special needs, which can send education costs sky rocketing, jeopardizing the quality of education for current students. As already mentioned, Webutuck has issues with having enough buses & drivers to get the current population of school children to & from school.

HRH & Corporations like them use people as pawns. They are the ones profiting from these "developments". In fact, Mary Linge of HRH, says "anything under 28 houses is not profitable for HRH". They are not in it for anyone's benefit but their own. Has HRH ever handled a project of this magnitude? What is their track record? Their reputation is questionable at best...they have proven to be inadequate & consistently fail to follow through on promises made once the project is done.

The Boards' decision MUST take into account the concerns of the residents most affected by this housing project.
We have a list of concerns, unanswered questions & misinformation that we would like straight answers to. We request these questions & concerns be answered **BEFORE** HRH moves to the SEQR process.

1. How many similar projects has HRH developed? None that HRH has been able to provide as a reference for the Board to see. It was stated by Mary Linge in one of the first Planning Board meetings that HRH HAS NOT DONE anything comparable to this project.

Their experience is primarily urban, with rental units & apartments. And their track record for upkeep of these properties is questionable. Cascade Creek is very different - we are rural houses & an HOA structure. The latter in particular entails a host of complications. HRH is treating Amenia as an experiment. If assumptions are incorrect, things can go downhill quickly and Amenia will be left holding the bag.

2. Did HRH submit any documentation on past completed projects such as returns in investors capital, overall project time frames & the exit process's efficiency?

3. Did HRH submit a business plan to clearly outline their market strategy, operational timeline & financial forecasts? None that we have seen.

4. Has HRH submitted any documentation on the availability of funding & is funding secure?

5. Will the project impact the community financially in terms of service & taxes?

HRH has very little landscaping in their plans. They claim to be adding a tree to every house. We can surmise they will be fledgling, tiny trees that do not help the landscape whatsoever. It is impossible to believe any landscaping they claim to add will be an asset. It would, no doubt, be minimal at best & non-existent based on HRH's track record. They have zero regard for existing homeowners & no regard for the landscape of our neighborhood. They mentioned that an entire section will not be getting any trees or shrubs between the property lines because there are already some there & they "don't plan to cut them". The area they are referring to will only provide a buffer a few months of the year as none of it is evergreen.

Is Hudson River Housing qualified to do this project?
The Planning Board and public must know what other developments HRH has developed in the past. How many projects has HRH developed? Were those projects similar to the current development? It was also stated in one of the first meetings by Mary Linge that they **have never done anything on this scale**. Amenia should not be the testing ground for an unproven developer with no experience or reputation. Before approving this project, the Planning Board and Public should see documentation on any past completed projects such as cost overruns, overall project time frames, and the exit process's efficiency. The Planning Board and Public should be given HRH's market strategy, operational timeline and financial forecasts. HRH should submit documentation on the availability of funding and if it's been secured. The Planning Board MUST get references from communities that have worked with HRH.
The quality of work, the style, and track record must be reviewed before advancing this project.

Reading from HRH's proposal: (our reply is in parentheses)
Since 1983, HRH has developed 1,312 units of housing and 81 commercial spaces generating $210,045,838 of investment through renovation/rehabilitation and new in fill construction. In addition to large and small multi-family rental housing projects, HRH's real estate development history includes creating twenty-three (23) single-family and twenty-nine (29) two-family homes for sale to income-eligible first-time homebuyers.

(HRH is primarily a company that develops RENTAL units. It is clear in their proposal that they have only developed 23 single family homes. That's 3 fewer than their plan of 26 houses in one development. This is NOT their expertise.)

The proposed Cascade Creek development will create a vibrant, new multifamily residential community at the intersection of Route 22 and Cascade Road in Amenia, Dutchess County, New York 12501. Situated adjacent to single-family **rural residences**, 24+ acres of vacant land will be transformed into Cascade Creek. The plan proposes creating twenty-eight (28) ¼ **acre parcels** with 14+ acres being conserved around the perimeter as open space. The tree lined perimeter of the overall parcel will be preserved to maintain the pastoral setting and landscape of the Town of Amenia. The overall design goal of Cascade Creek is to preserve the rural fabric of the Town so that it fits well with the surrounding landscape and topography.

(Unless HRH reduces the number of houses, 1/4-acre parcels **DO <u>NOT</u> PRESERVE** the landscape of our neighborhood. Any new house must be on 1 acre or more to equate with the existing homes)

Forty-one (41) years of experience with housing and community development has enabled HRH to leverage a network of grassroots support, government, nonprofit and private partners. The Town of Amenia Supervisor has expressed his strong support of this project and there has been great interaction with the Housing Board and Town Board Members.

(Amenia Town Supervisor is no longer Leo Blackman. Charlie Miller's name is all over the HRH proposal - HE DOES NOT HAVE THE AUTHORITY to initiate such a development)

As stated, Cascade Creek will create a minimum of twenty-eight (28) new units of workforce housing for low- to moderate-income residents. The homes will be fee simple homeownership sold to households under 80% of the Area Median Income (AMI) as defined by HUD.

(Again, Workforce Housing is primarily used when a new factory or large employer network is moving into the area, that is NOT the case here in Amenia)

The Town of Amenia is served by the Dutchess County Public Transit System with a stop at the intersection of Route 22 and Route 343 in close proximity to Cascade Creek.
Metro-North Railroad has two rail commuter rail stations in Amenia, with service to New York City and all points between via the Harlem Line. Trains leave every two hours during midday, evenings and weekends. In rush hour, peak-direction trains leave about every 30 minutes.

(There is **NOT** Public Transportation with a stop at the intersection or Rt.22 & 343. Metro North trains come into Wassaic every 2 hours, PERIOD! <u>There is no rush hour, peak-direction trains every 30 minutes</u>.)

HRH wants to build 26 houses on 1/4 acre lots on FARMLAND with approximately 20 feet between houses. A High-Density Subdivision is allowed if it can be established as a Conservation Subdivision & given a Work Force Housing Density Bonus. It is questionable that this development deserves to be called a Conservation Subdivision & it is doubtful this will create affordable housing. The modular houses are to be made by Simplex Homes & shipped from Scranton, PA. The heat will be electric. Waste water is to be pumped to a common leach field.

HRH claims to offer work force housing & will offer a subsidy on the purchase price. The subsidy will be based on the affordability of 80% of the Poughkeepsie-Newburgh median income, (not the Amenia area median income) aiming to keep mortgage payments at 33% of income. For an approximate example, a house sold for $572,000 would receive a subsidy of $218,000. If the buyer took out a 30-year loan at 6% on the remaining $354,000, the buyer would have a $25,700

per year payment, a $2,142 monthly payment. Restriction would be on the resale price of the house for 25 years. It is unknown what the HOA fees would be.

(Income in the Amenia area is nowhere near the median income of larger metropolitan areas)

As per the AMI criteria in section 121-42 we have these questions:
1. What is the estimate for each homeowner's obligation with respect to insurance, taxes & HOA fees? What are some conditions that might cause HOA fees to spike?
2. When our base number for these expenses is deducted from 30% of the applicant's income, how much is available for mortgage payments? What is the range of mortgages this calculation can sustain?
3. What is the total cost of the project? Who is funding it? Are the funds secure? How much has HRH secured as of today?
4. Are there contingencies for a shortfall? What if not enough houses find suitable buyers? The parameter the town has set for suitable applicants is narrow. They need to have enough assets & income to meet the base qualifications, but not so much that they exceed the limits. Can HRH lower the bar for applicants to recoup their fixed costs but be left with a significant pool of homeowners who would struggle to meet their obligations?

1. We want The Town Board & Planning Board to follow the principles of development in the Comprehensive Plan and the Greenways Connection Compact.
2. Farmland should be preserved
3. Housing should be built in the Hamlets, in filling vacant lots.
4. Housing should be developed in the TDDS
5. Conservation Subdivisions should actually protect farmland & open space rather than developing a high density suburb
6. It is imperative that environment & wildlife habitats are not harmed by development
7. Make sure the Town does not incur costs for subsidizing this housing
8. A conservation subdivision & affordable housing density bonus are fine, but not if they encroach on the zoned property of existing residents

The proposal set for by Hudson River Housing will have a significantly detrimental impact on the character of our neighborhood. Density being a huge but just one concern. Traffic, loss of farmland, loss of wildlife habitats, negative impact on the schools system, the increase burden to our already overwhelmed first responders, etc. etc. are just a few of the reasons the Planning Board should reject this proposal.

Quoting from the Amenia Town Code:
From the Town of Amenia, NY Codes
Art 1: Title, Scope and Purposes

D. In recognition of the economic value Amenia's natural beauty and environmental amenities, to **protect the integrity of scenic views, ridge lines, agricultural land, existing and potential recreation areas, waterways, groundwater and surface water supplies, ecological systems, wetlands, wildlife habitat, and natural vegetation, and to maintain environmentally significant open space in its predominately undeveloped state, in order to maintain property values and preserve the open and rural character of the Town.**

E. To preserve and protect lands and buildings that are historically significant and to enhance the aesthetic and architectural quality of the entire community.

F. **To encourage the continuation of agriculture and the preservation of open space, and to avoid regulating agricultural uses in a manner that unreasonably restricts or regulates farm structures or farming practices, while encouraging other economic activities that require large areas of contiguous open space, such as sustainable forestry, tree farming, and recreation.**

G. **To regulate building density** in order to concentrate population in appropriate locations where municipal infrastructure is available and to ensure access light and air, conserve open space, facilitate the prevention and fighting of fires, minimize the cost of municipal services accomplish the other purposes enumerated in section 263 of the Town Law of New York State.

H. **To integrate harmoniously different types of homes that are compatible with the Town's rural character and scale,** concentrating retail businesses in

and near hamlets, encouraging farming operations and allowing large-scale business and industry in well-buffered locations with good transportation access.

Signed: We The People of the Cascade Creek Community

Ericka Howard

From: B Mostachetti <bmostachetti@gmail.com>
Sent: Monday, November 9, 2026 7:44 PM
To: Ericka Howard
Subject: Fwd: Cascade Creek Subdivision

Received
NOV 10 2026
Planning
Zoning

---------- Forwarded message ---------
From: **B Mostachetti** <bmostachetti@gmail.com>
Date: Mon, Nov 9, 2026 at 7:43 PM
Subject: Cascade Creek Subdivision
To: <rhamm@ameniany.gov>

I feel that the proposed work-force housing plan is too large for the site.
The 'suburban subdivision' designation seems inconsistent with the history and continued understanding of the rural nature of the Town of Amenia, with a population of 3,769 at the 2020 census. Additionally, where is all the work to support the home purchasers?

Problematic issues for me are the water wells and pumping, the common sewage infrastructure and the stormwater management practices. If these are to be operated by the landowners proposed HomeOwners Association, it seems incongruous for a low-to-moderate income suburban housing plan to add an additional financial burden on the homeowners.

The developer offers the road to the town. Does that happen at the completion of the 26 housing units? And why should the highway department accept additional roads? Can the department absorb the additional workload?

Has there been conducted a reliable traffic study to determine the in and out flow of construction vehicles during the building phase? And the change in traffic after construction is complete. There is the grocery store across the street with much daily traffic. Will the 26 homes be built at once or the longer term building of each home as it is sold? Will a traffic light be installed during the construction phase on Route 22 or merely stop signs on Mygatt Road and the road on the development side? Once the homes are occupied there will be significant entrance and exit from the development. It's reasonable to estimate that each home will have 2-5 automobiles parked in their driveways.

The plans shown show that each home will have a garage but are these the actual plans of the developer or a simulation to demonstrate the developments' state requirements for water and sewage. If there are no garages then each homeowner will be forced to leave their garbage cans outside of their home. This is a great incentive for bears to roam the area and feed from the barrels. Or will there be large dumpsters?

The plans also show trees and shrubs placed at each home and throughout the development. When will these amendments occur - at the completion of each home or at the end of the construction of 26 homes which notwithstanding the workforce designation, with an interest rate of between 6.5% and 7.1% the sale of new homes will be slow.

Will mail be distributed per household or can their distribution be in the form of a collective mail house inside the development and not roadside on Route 22?

Has there been a study which reflects the impact on the Webutuck School system? Most importantly, where would a bus stop to load and offload the children?

The biggest concern that I have about this development is the water necessary for the fire district to use in the event of a fire. They are not allowed to use the water designated for the homes. And there can be tanks built to hold water but would the water to fill them come from the wells used for residences? The engineering firm speaks of the aquifer having the ability to accommodate 26 homes but does not account for the 20 or so homes and wells above the level of the aquifer and those homeowners and wells with adjacent property also affected by the aquifer.

Thank you for your consideration of my thoughts,
Respectfully,
Betty Mostachetti
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Amenia NY
845.264.1012