



John Kellard, P.E.
David Sessions, RLA, AICP
Joseph M. Cermele, P.E., CFM
Jan K. Johannessen, RLA, AICP

May 2, 2024

Supervisor Ed Lachterman and the
Town of Yorktown Town Board
363 Underhill Avenue
Yorktown Heights, NY 10598

RE: Homeland Towers, LLC
Granite Springs - Wetland Report

Dear Supervisor Lachterman and Members of the Town Board:

On behalf of our client, Homeland Towers, LLC, KSCJ Consulting is pleased to submit this Wetland Report in connection with Homeland Towers' application before the Town Board. KSCJ Consulting has delineated the wetlands located on the subject parcel, which consists of ± 3.87 acres of land located on the north side of Granite Springs Road in the Town of Yorktown. The property is identified on the Town of Yorktown Tax Map as Section 27.11, Block 1, Lot 33. The subject property is owned by the Town of Yorktown and is proposed to be developed with a 130-foot monopole tower, ancillary telecommunications equipment, gravel driveway and gravel compound area. The subject property is the vicinity of residential uses, undeveloped land and farmland.

The configuration of the parcel is referred to as a "flag lot" with the "flagpole" portion of the lot fronting on Granite Springs Road. The western side of the "flagpole" contains wetlands that are part of a larger wetland system located on the parcel to the west, also owned by the Town of Yorktown. On-site wetlands and watercourses are jurisdictional to the New York State Department of Environmental Conservation (NYSDEC) as Wetland A-13, the Army Corps of Engineers (ACOE), and the Town of Yorktown. On-site wetlands and watercourses were delineated by this office on November 9, 2021.

Vegetation, Soils and Hydrology

The subject property has varied topography and generally slopes east to west with the highest elevation located in the northeast corner of the site. The property is wooded and contains Udorthents, wet substratum (Uc), Ridgebury loam, 3 to 8 percent slopes (RdB), Paxton fine sandy loam, 2 to 8 percent slopes (PnB) and Woodbridge loam, 0 to 3 percent slopes (Wda) soils.

Red Maple trees dominate the wetland and wetland buffer; however, several Sugar Maple and Aspen trees are located adjacent to the wetland. Skunk Cabbage, Phragmites, Willow, Spice Bush, Dogbane, Honeysuckle, Sedges, Sensitive Fern, and Clearweed were found along the wetland boundary with Honeysuckle, Burning Bush, Virginia Creeper, Garlic Mustard, and some Poison Ivy dominating the upland area. Hydric soils within the wetland boundary were black (10YR 2/1) within the upper 4 inches, turning

CIVIL ENGINEERING | LANDSCAPE ARCHITECTURE | SITE & ENVIRONMENTAL PLANNING

500 MAIN STREET | ARMONK, NY 10504 | T: 914.273.2323 | F: 914.273.2329
WWW.KSCJCONSULTING.COM

Supervisor Ed Lachterman
May 2, 2024
Page 2 of 5

brown (10YR 4/3) with redox concentrations between 4 – 13 inches, turning dark gray (10 YR 4/1) with redox concentration below 13 inches. Hydrology indicators include observed water inundation, saturated soil, and exposed roots.

The below photograph was taken on-site during a May 18, 2022 site visit; the photo was taken from within the “flagpole” looking west:



Jurisdiction

As stated above, on-site wetlands are jurisdictional to the NYSDEC as Wetland A-13. Wetlands were delineated in accordance with the NYSDEC Freshwater Wetlands Delineation Manual, July 1995, and the boundary was verified as being accurate by Sarah Pawliczak of the NYSDEC on November 29, 2021. A fully executed NYSDEC Wetland Validation Map is on file with the Town. In addition to regulating the wetland proper, the NYSDEC regulates a 100-foot Wetland Adjacent Area and disturbance within the wetland and or Wetland Adjacent Area, as proposed, will require an Article 24 Freshwater Wetland Permit from the NYSDEC.

Supervisor Ed Lachterman
May 2, 2024
Page 3 of 5

Wetlands were delineated in accordance with the Town's definition of "Wetland/Freshwater Wetland" and the wetland boundary line was evaluated by the Town of Yorktown's Wetland Consultant on March 2, 2022. The Town regulates a 100-foot wetland/watercourse buffer area and disturbance within the wetland or buffer, as proposed, will require a Wetland Permit from the Town of Yorktown.

On-site wetlands are jurisdictional to the ACOE and disturbance within the wetland proper, as proposed, will require a Permit as issued by the ACOE; note that the ACOE does not regulate a wetland adjacent area or buffer area. On-site wetlands were delineated in accordance with the Corps of Engineers Wetland Delineation Manual, 1987, and its supplements.

While the wetland boundary line as confirmed by the NYSDEC and the Town of Yorktown are similar, the boundary line does vary between Wetland Flags A5 and A9, whereby the Town's line is located further into the site (to the east) than the NYSDEC wetland boundary line. The two (2) lines are depicted on the submitted drawings. While a formal ACOE Jurisdictional Determination has not been conducted, for the purposes of this analysis and permitting, we assume that the ACOE wetland boundary line is coterminous with that of the Town's.

The subject property is located within the New York City East of Hudson Watershed and, therefore, is subject to the Rules and Regulations of the New York City Department of Environmental Protection (NYCDEP). The NYCDEP prohibits the installation of a new impervious surface within 100-feet of a NYSDEC wetland or NYCDEP Jurisdictional Watercourse. As designed, there are no impervious surfaces, as defined by the NYCDEP, within 100-feet of the NYSDEC wetland.

Project Description

Homeland Towers, LLC is proposing to construct a telecommunications facility in the form of a 130-foot monopole tower and ancillary equipment within a 75' x 75' fenced gravel compound area. The facility will be accessed from Granite Springs Road via a ±500-foot gravel access driveway, ±425 feet of which is located within the wetland buffer and ±920 s.f. of which will be constructed within the wetland proper, an unavoidable impact. Electrical and telecommunication services will be provided to the facility, underground, from Granite Springs Road, and will generally follow the proposed driveway. Due to the topographical, wetland and property line constraints, retaining walls are needed on one or both sides of the driveway for the first ±275 feet off Granite Springs Road; the maximum height of the retaining walls will be ±4 feet. Stormwater runoff from the compound and driveway will be managed via appropriate grading, drainage inlets, and piping and a Stormwater Pollution Prevention Plan (SWPPP) will be prepared.

Wetland Impacts

It is anticipated that the total site construction work will result in approximately 26,000 s.f., not including landscaping and wetland mitigation (note that the area of disturbance calculation is subject to change as

the design progresses). Of the 26,000 s.f. of total land disturbance, approximately 13,775 s.f. of disturbance is proposed to occur within the wetland buffer and ±920 s.f. within the wetland proper. Disturbance within the wetland buffer will take the form of tree removal, land grading, construction of a gravel driveway, construction of retaining walls, and installation of drainage and electrical/telecom utilities. The portion of the project to be located within the existing wetland consists of ±86 feet of proposed retaining wall, ±385 s.f. of proposed gravel driveway, and associated grading. In terms of tree removal, three (3) trees are proposed to be removed from within the wetland proper and approximately 55 trees from within the wetland buffer.

The proposed disturbance to the wetland and wetland buffer is necessary and unavoidable. The subject parcel has only one means on ingress and egress and that is through the ±100 feet of road frontage on Granite Springs Road. Homeland Towers, LLC has gone to great lengths over the last two (2) years to seek an alternate means of access to reduce or eliminate wetland impacts, including negotiating access easement with two (2) different adjoining property owners, to no avail.

Justification for Permit and Mitigation

The proposed facility is needed in the community to fill a gap in coverage. While other sites in the vicinity were evaluated, the subject parcel was determined to be the only feasible and least intrusive alternative. While the property does present some challenges in terms of access, the majority of the parcel, where the tower is to be constructed, is environmentally unconstrained. All practical efforts have been made to first explore potential alternatives to avoid or minimize disturbance to wetlands and buffer areas and then to minimize impacts to the extent possible through project design and mitigation. The following components have been incorporated into the design to minimize impacts:

- The driveway and compound area will be constructed entirely of gravel; the driveway apron meeting the asphalt road will be a porous Grasscrete paver; impervious surfaces have been reduced to the extent possible and there are no impervious surfaces located within the wetland or wetland buffer.
- The applicant is exploring the use of a porous retaining wall system.
- The limits of land disturbance have been minimized to the extent possible, thereby reducing tree removal and grading.
- The vertical alignment of the driveway follows the natural topography to the extent possible to reduce grading (cut & fill).

Supervisor Ed Lachterman

May 2, 2024

Page 5 of 5

- While a formal wetland mitigation plan has not yet been developed, the applicant intends on proposing wetland mitigation in the form of wetland creation areas at a ratio exceeding 1:1.
- A Stormwater Pollution Prevention Plan (SWPPP) will be prepared, as required.

We thank you for your time and consideration and look forward to working with you on this project, as we continue to further the design and provide you with the necessary information as required under your wetland ordinance.

Very truly yours,



Jan K. Johannessen, RLA, AICP
KSCJ Consulting

JKJ/dc

cc: Homeland Towers, LLC
Robert Gaudio, Esq.