



MEMORANDUM

TO: David Smith, Director of Planning
FROM: Steven Robbins, P.E., LEED AP
DATE: November 5, 2025
RE: North Edge Realty
SEQRA Site/Civil Review
TM: 4.19-2-2, 4.19-2-3, 4.19-2-4; R-40, R-80 Districts

GENERAL

The purpose of this memorandum is to provide a summary of our comments related to our review of the submittals for SEQRA approval related to the site/civil and stormwater comments to the Town Board for the proposed North Edge Realty development located in the Town of Somers, New York.

The Applicant is proposing the construction of a 15.62 acre multi-family residential development located at 45 Route 6, and proposes to include 77 total units with a recreation building, along with associated roadways, stormwater management facilities, and landscaping. The project site is currently undeveloped and consists of mostly wooded areas, and the Applicant seeks modifications to the existing zoning to create a zoning overlay designation for the Proposed Action. The Town Board is acting as Lead Agency under SEQRA, and the Applicant has prepared an Expanded Environmental Assessment Form with a scope of potential environmental impacts for the Proposed Action. The total proposed limit of disturbance is 13.4 acres, with construction to be phased in four total phases. The project site will cause greater than one (1) acre of disturbance, is located within the East of Hudson watershed, and causes disturbance of steep slopes and tree removal.

This review focused on the engineering design and the associated Town Code requirements in accordance with the following:

- Town of Somers Code, Chapter 93: Stormwater Management and Erosion and Sediment Control, and other sections, as applicable.
- Town of Somers Code, Chapter 144: Site Plan Review
- Town of Somers Code, Chapter 148: Steep Slopes Protection
- Town of Somers Code, Chapter 156: Tree Preservation
- Town of Somers Code, Chapter 170: Zoning
- New York State Standards and Specifications for Erosion and Sediment Control, dated November 2016.



- New York State Department of Environmental Conservation's (NYSDEC's) Stormwater Management Design Manual (SMDM), dated January 2015.
- Rules and Regulations for the Protection from Contamination, Degradation, and Pollution of the New York City Water Supply and its Sources, Chapter 18 (NYCDEP Regulations).

DOCUMENTS REVIEWED

- Response Letter, "Watershed Inspector General Responses 10-22-25", prepared by Bibbo Associates Engineering, P.C., dated October 22, 2025;
- SWPPP, "Stormwater Pollution Prevention Plan for North Edge Realty Corporation", prepared by Bibbo Associates Engineering, P.C., dated October 30, 2024, revised October 22, 2025;
- Pollutant Loading Analysis, "Pollutant Loading Analysis for North Edge Realty Corporation", prepared by Bibbo Associates Engineering, P.C., dated July 16, 2025, revised October 22, 2025;
- Site Plans, "North Edge Realty", prepared by Bibbo Associates Engineering, P.C., dated October 30, 2024, revised October 22, 2025;
- Cover Letter, "RE: North Edge Realty Corp. Route 6 T.M. # 4.19-2-2,3 & 4", prepared by Bibbo Associates Engineering, P.C., dated October 22, 2025;

PERMITS AND APPROVALS REQUIRED

- Town of Somers Town Board: SEQR Determination
- Town of Somers Planning Board: Preliminary Subdivision Plat Approval
- Town of Somers Planning Board: Stormwater Management and Erosion and Sediment Control Permit
- Town of Somers Planning Board: Steep Slopes Protection Permit
- Town of Somers Planning Board: Tree Removal Permit
- Town of Somers Planning Board: Site Plan Approval
- NYSDEC: SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-20-001)
- Westchester County Department of Health (WCDOH): Approval of Sanitary Sewer Systems and Water Main
- WCDOH: Subdivision Approval
- WCDOH: WCBOL District Boundary Modification



- NYCDEP SWPPP Approval

DISCUSSION

The following is a summary of our preliminary comments based on our review of the submittals as noted under the Documents Reviewed section. This memo includes previously issued comments (noted in *italics*) and their corresponding status (noted in **bold**) from the completeness review memo dated March 3, 2025. It should be noted that further comments may be provided upon technical review of the submitted information and subsequent project review phases.

Review of Correspondence from New York City Watershed Inspector General

1. The Office of the New York City Watershed Inspector General prepared comment letters dated May 1, 2025 and August 13, 2025 based upon their review of the Stormwater Pollution Prevention Plan (SWPPP) and the associated Site Plans that were prepared by the Applicant. The Applicant has prepared responses to both comment letters in a subsequent submission dated October 22, 2025. Based on our office's review of both the comment letters from the Watershed Inspector General and the associated response letter from the Applicant, we believe that the responses substantially address the WIG's comments and is sufficient for the Town to address the environmental impacts for this proposed development.

Stormwater

1. *The Applicant shall clearly indicate the proposed limit of disturbance on the site plans.* **Addressed.**
2. *The Applicant shall indicate how the proposed disturbance within all areas with slopes steeper than 15% will be protected from erosion during construction (e.g., erosion control matting).* **Addressed.**
3. *The SWPPP shall contain an estimate of site earthwork, indicating total net cut/fill in cubic feet for each phase of construction.* **Addressed.**
4. *The Applicant shall provide a minimum 12' width for proposed maintenance accessways for the proposed infiltration basins and hydrodynamic separator pretreatment systems. The longitudinal slope shall not exceed 15% slope per the design guidelines of the NYSDEC SMDM.* **Addressed.**
5. *The Applicant shall provide sizing calculations for the proposed riparian buffer.* **Addressed.**
6. *The Applicant indicates the riparian buffer consists of the natural buffer adjacent to the stream and entirely within the NYSDEC stream setback. The*



*Applicant shall clearly indicate the riparian buffer on the site plan drawings, and also provide orange construction fencing in the erosion and sediment control plans to protect the riparian buffer. **Addressed.***

7. *The Applicant shall provide pretreatment for the proposed riparian buffer. In addition, it appears steep slopes are proposed for several areas of contributing sheet flow to the proposed riparian buffer, in exceedance of the maximum allowable slope per Section 5.3.2 of the NYSDEC SMDM. **Addressed.***
8. *The Applicant shall provide a minimum cul-de-sac diameter of 90' per Town Code 150-21. **Addressed.***
9. *The Applicant shall provide a landscaping plan that indicates the existing trees and the trees that are proposed to be removed, including those within Street A that connect to property to Mahopac Ave. **Addressed. The Applicant shall provide a complete Landscaping Plan as part of the Site Plan approval process.***

Wastewater

10. *Since the project is proposing a new pump station to be connected to the existing forcemain system, the capacity analysis shall consider the hydraulic conditions when the proposed and existing pump stations are simultaneously discharging, and the impacts of the additional flow on the operation of the existing systems. **Partially Addressed – the design and capacity analysis of the sewer forcemain system will be developed further during subsequent project phases, and additional analysis of the sewer forcemain system will be required. The Applicant shall provide this information for Site Plan Approval.***
11. *Applicant shall confirm with Westchester County DEF that additional flow capacity exists at the Peekskill WWTP. **Partially Addressed – the letter from WCDEF is not a statement of available capacity for this specific project. It should be noted that additional petitions to expand the sewer district to serve this project may be required and more formal documentation of willingness to serve will be required from WCDEF. The Applicant shall provide this information for Site Plan Approval.***

Water

12. *Applicant shall describe the need for irrigation at the property beyond establishment and how this additional demand can be mitigated. It is noted that the irrigation demand alone is greater than the peak hour domestic water demand. **Partially addressed – Additional documentation of irrigation***



demands shall be provided during subsequent project review phases, and shall not include permanent lawn area irrigation. The current documentation shall be considered a “worst case” for the purposes of environmental impact analysis. The Applicant shall provide this information for Site Plan Approval.

13. *Applicant shall analyze the available fire flow from the system during maximum day demand, and the impact of peak demands (domestic plus irrigation) on system pressures during the peak hour. Addressed – Applicant shall note that the scope of the project. **Partially addressed – As discussed with the Applicant, additional testing may be required to resolve questions about the fire flow testing results and available fire flow. The design of the buildings and overall project scope may be required to change if adequate fire flow is not available. The current analysis shall be considered a “worst case” for the purposes of environmental impact analysis. The Applicant shall provide this information for Site Plan Approval.***
14. *Applicant shall confirm that the needed fire flow will not result in a pressure less than 20psi in the distribution system, not just at the flowing hydrant. **Partially addressed – see response to #13. The Applicant shall provide this information for Site Plan Approval.***

Please feel free to contact our office with any questions. Please provide a response memo identifying where responses to these comments can be located on revised submittals. As this memo is an initial completeness review, further comments will be provided upon technical review of the submitted information.