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February 13, 2026

Town Board
Town of Yorktown
363 Underhill Avenue
Yorktown Heights, New York 10598

Attn: Supervisor Ed Lachterman and
Members of the Town Board

RE: Homeland Towers, LLC
Granite Springs

Dear Supervisor Lachterman and Members of the Town Board:

On behalf of our client, Homeland Towers, LLC, KSCJ Consulting is pleased to submit our revised plans, dated, last revised February 10, 2026, in connection with Homeland Towers' application before the Town Board. The subject property consists of ± 4.17 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 with an address of 62 Granite Springs Road. 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 located within the vicinity of residential uses, undeveloped land and farmland.

The following is in response to comments contained within the Conservation Board's January 12, 2026 letter to the Town Board:

1. The Conservation Board's request for a wildlife survey will be addressed by EBI Consulting, our client's environmental consultant.
2. The wetland boundary has been verified as accurate by both the New York State Department of Environmental Conservation (NYSDEC) and the Town's wetland consultant. Proof of verification was previously submitted to the Board.
3. As previously evaluated, the proposed action will result in $\pm 15,627$ s.f. of wetland buffer disturbance; no disturbance to the wetland proper is proposed. Disturbance to the wetland buffer is unavoidable and has been minimized to the greatest extent practicable. The major functions of the existing wetland buffer include filtration of sediment and nutrients, reduction of erosion through moderating stormwater runoff, and transitional habitat between the upland forest and

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lower lying wetland. While the total wetland buffer disturbance has been calculated to be $\pm 15,627$ s.f., $\pm 4,670$ s.f. will be occupied by the driveway and the balance ($\pm 10,957$ s.f.) is being disturbed temporarily for grading or planting and will be vegetated as part of the project. Revegetation of the wetland buffer, as proposed, will replicate the existing functions by maintaining a vegetated filter along the wetland edge, controlling erosion, and providing habitat. Plantings on the east side of the driveway have been selected to also act as a visual buffer from the adjacent neighbor. While there is little, if any, evergreen trees and shrubs being removed, evergreens are being introduced between the driveway and the residential property line to serve as a visual buffer.

A Stormwater Pollution Prevention Plan (SWPPP) has been prepared to minimize impacts to wetlands and surface waters both during and after construction. Stormwater mitigation, in the form of infiltration below the tower compound area, will effectively reduce peak rates of runoff entering the wetland in the 1-, 10-, and 100-year storm events when compared to the existing condition.

The plan calls for a mitigation area of 16,010 s.f., which includes the installation of 24 trees, 54 shrubs, 200 perennials, installation of a native conservation seed mix within the limits of disturbance, and installation of stormwater infiltration to reduce peak flows to the wetland. Other forms of mitigation that have not been included in the calculation, but will nonetheless benefit the wetland, include a reduction in the width of the driveway, use of a gravel driveway surface, elimination of impervious surfaces within the wetland buffer, use of deep sump catch basins to capture sediment, use of gabion style retaining walls (pervious), and tree and deer protection measures.

4. In response to comments pertaining to the proposed mitigation plan, please refer to paragraph #3 above. Further, please note that the total area of wetland buffer disturbance (including grading and planting areas) is 15,627 s.f. or 0.35 acre; not 0.65 acre as identified in the Conservation Board's letter. We have adjusted the proposed plant schedule to include more trees and plants that are currently on-site, such as Red Maple, Spicebush, Sensitive fern, and Fox sedge.
5. The proposed action will result in the removal of 84 trees. The proposed mitigation plan calls for the installation of 24 trees, 54 shrubs, 200 perennials and a native conservation seed mix to reestablish a herbaceous layer on the forest floor. The Conservation Board requested that the planting plan be revised to specify plants that currently exist on the property and are being removed; the planting plan has been revised, as requested. The trees to be planted are all native and the deciduous trees to be planted are now specified to be all Red maple, which is the dominant tree within the project area. The shrubs to be planted along the wetland edge are now all specified to be Spicebush, which is native and currently found on-site along the wetland edge. The 200 perennials which are proposed between the wetland edge and the driveway are native and consist

of Sensitive fern and Fox sedge, both of which are currently found on-site. Other forms of mitigation include tree protection measures to prevent damage to existing trees during construction; installation of deer fencing around planted areas; and installation of trunk guards on all new tree plantings to prevent buck rub.

6. Homeland Towers has no objection to establishing a bond to cover the proposed planting; a maintenance plan can be developed at time of establishing the bond.

The following plan changes have been made in response to comments received:

1. The adjacent Tax Lot (27.07-1-53), also owned by the Town of Yorktown, was previously listed on the Cover Sheet (Sheet ZD-1) as being a part of the application. This tax lot has been removed as planting/wetland mitigation is no longer proposed on this parcel; you will recall that we had previously shifted all wetland mitigation plantings onto the subject lot, Tax Lot 27.11-1-33.
2. Verizon's 27' x 15' lease area, 22' x 10' equipment pad, 50kW generator, and associated 500-gallon propane tank to be situated on a concrete pad, have been added to the site drawings.
3. The Tower Elevation (Sheet ZD-8) has been revised to illustrate Verizon's equipment and mounting bracket to be installed on the tower at elevation 126' AGL. Verizon's antenna array plan is also provided on this Sheet.

The following is in response to comments received:

4. The wetland delineation was conducted by this office on November 9, 2021, field verified by the NYSDEC on November 29, 2021, and verified again by the Town Wetland Consultant on December 13, 2024. The timing of the delineation is completely appropriate and industry commonplace as the vegetation was easily verified and the ground was not frozen so as to prevent soil investigation. We note that the characteristics and identifiers of hydric soils do not change seasonally and wetland scientists, including the professionals that conducted and verified the boundary, are trained to identify plants outside of the growing season.
5. There is adequate room alongside the length of the proposed driveway for snow storage as a result of snow plowing. The same can be said at the top of the driveway, adjacent to the compound, where there is ample room for a truck to plow snow along the perimeter of the driveway and parking area, while providing room for the plow truck to turn around. Given that the drive is only 10 feet wide, and the apron at the compound is not overly sized, the amount of snow to be removed will be relatively little. As such, snow removal can all be accomplished without pushing snow off-property

or within the wetlands. Further, given the limited use of the driveway, there will be no application of salt or sand that could impact down-gradient wetlands or surface water from runoff.

6. The entire driveway and compound area are located outside of the 100-year FEMA Floodplain. A mapped floodplain (Zone A) is located to the west of the subject property, on an adjacent parcel of land owned by the Town (Tax Lot 27.07-1-53); please see FEMA FIRM 36119C0042F which is included within the Stormwater Pollution Prevention Plan (SWPPP). The driveway will begin off Granite Springs Road at elevation 477.5', will descend for approximately 175 feet to a low point of 471.76' and then steadily rise to the compound at elevation $\pm 500'$, 22.5 feet above Granite Springs Road. The project will not contribute to flooding as the driveway and compound will be constructed with gravel surfaces. The proposed change in land cover type will result in a negligible increase to peak rates of runoff. In order to mitigate this increase, the gravel compound area will be constructed with a minimum 1-foot deep drainage layer, set level, to serve as stormwater detention. Although this layer will allow for infiltration, conservatively our design does not take infiltration into account and only considers this to be storage for calculation purposes. The system as designed, reduces peak stormwater rates through the 100-yr storm event, as compared to existing conditions, by $\pm 1.9\%$ - 5.6%. Please refer to the submitted Stormwater Pollution Prevention Plan (SWPPP) for further information.

I thank you for your time and consideration and we look forward to discussing this further with you and the Board at your upcoming Board meeting.

Very truly yours,



Jan K. Johannessen, RLA, AICP
KSCJ Consulting

JKJ/dc

cc: Homeland Towers, LLC
Robert Gaudio, Esq.