

## TOWN OF YORKTOWN CONSERVATION BOARD

Town of Yorktown Town Hall, Yorktown Heights, New York 10598, Phone (914) 962-5722

To: Town Board  
From: Conservation Board  
Date: January 12, 2026  
Subject: Town Board Referral: Homeland Towers, LLC – Granite Springs Road  
Proposal to lease a portion of the property for the installation of a public utility wireless telecommunications facility, including a 130-ft monopole tower and equipment compound designed for the collocation of multiple wireless carriers and town emergency services entities.

The Conservation Board reviewed the above referenced subject at their meeting held on Wednesday, January 7, 2026. David J. Kenny, Esq. of Snyder & Snyder, LLP; and Vincent Xavier, regional manager for Homeland Towers were present to review revised plans to construct a cell phone tower with related equipment and access road within a wetland buffer owned by the town. The applicant's engineer was unable to attend the meeting.

Also present at the meeting were approximately 20 residents who were opposed to the use of this site for the placement of the tower; some of which submitted written letters to the Conservation Board.

The applicant's attorney reported on steps that were taken to meet conditions requested by the Conservation Board in their previous memo dated May 15, 2024, and changes to the site plan since their last meeting.

The Conservation Board has the following comments:

1. The applicant provided letters from EBI Consulting and US Fish and Wildlife Service (USFWS) stating that actions the applicant is taking to protect any threatened and endangered species that could potentially be located on the site, are sufficient.

The Conservation Board had requested that a wildlife survey be conducted. The agencies providing letters used information from the USFWS Information for Planning and Consulting (IPaC) website to determine these findings and did not conduct an on-site seasonal survey to come to these conclusions. The Board requests that an appropriate on-site wildlife survey for bog turtles, a federally threatened species and a New York State endangered species, be conducted.

2. The letters received from concerned citizens included a letter from Doug and Karen Erickson dated 1/7/26 indicating that the wetland boundary, as surveyed by the applicant, may be incorrect. Steven Danzer, Wetlands and Environmental Consulting, hired by the Ericksons, reviewed the wetland boundary and stated that one of the flags, A6 "*was not an accurate depiction of the wetland boundary under existing conditions, in my professional opinion, and that wetland flag A6 which was clearly in the wrong place.*"

In light of this information, the Conservation Board recommends that the town's environmental consultant review the flagging of the wetland boundary at an appropriate seasonal time when wetland plants have emerged.

3. The placement of the access road almost fully eliminates the buffer on the southeast corner of the property. The purposes of a wetland buffer are to filter pollutants, control erosion and provide important wildlife corridors while minimizing disturbance to this important and increasingly rare ecosystem. The Board questions whether the proposed mitigation will restore this functionality.

Diane Dreier, Co-Chair  
Phyllis Bock, Co-Chair

Ed Lachterman  
Town Supervisor

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4. The wetland mitigation provided wasn't identified in acreage in the documents provided. The new EAF identifies that 0.65 acres would be impacted by the project so mitigation should be 0.65 acres. A rough estimate of the acreage of wetland plantings on the site plan indicates an area less than 0.25 acres. The mitigation proposed is for plantings of trees, shrubs and forbs mainly to shield the adjacent neighbor's property. This amount of mitigation for the project is inadequate and should be revisited. Also, the list of plants identified for mitigation should be revised to include native wetland plants that are currently on the site and will be removed.
5. The plan shows that approximately 88 trees would be removed for construction of the road and tower. A detailed tree mitigation plan is required.
6. All proposed plantings for wetland and tree mitigation should be bonded and a maintenance plan for replacement should be included.

Respectfully submitted:

*Phyllis Bock*

For the Conservation Board

/nc  
Attachment

Cc:   Applicant  
          Conservation Board

January 7, 2026

As a resident whose property will be directly impacted by this project I am writing to oppose the construction of a driveway and cell tower at 62 Granite Springs Road. Please forward my letter in opposition to both the Town Board and the Conservation Board. Please also confirm receipt of my letter by emailing me back.

I have several reasons for opposing the construction of a driveway and cell tower at 62 Granite Springs Rd that need to be considered by the Conservation Board.

The proposed plan as presented calls for disturbing over 28,000 square feet of land, including 15,627 square feet of wetlands buffer that may be home to the bog turtle, the monarch butterfly, the Indiana bat and other endangered species.

It is my understanding that the Hallocks Mills Wetland is most likely classified by New York State as a Class 1 wetlands. In New York State, a Class I wetland is the highest-ranked, most valuable, and most protected category, identified by the NYSDEC for its significant ecological functions, such as providing critical habitat for endangered species, supporting rare plant communities, or being linked to important coastal or clean water areas, requiring the most stringent development regulations.

As such any proposed development in the area should be held to the highest standard during the application process by the Town of Yorktown.

Our opposition is due to a variety of reasons, but the most prominent is that we believe the wetland delineation that is being presented for this project is not accurate. We believe that this project will actually be crossing the wetland area and not just the buffer area. The delineation line that is being submitted by the applicant was created in Nov. 2021 and did not take into account one of the three criteria set forth by New York State for wetland delineation. New York requires that "The hydrophytic vegetation criterion is mandatory under New York State's Freshwater Wetlands Act". By only delineating the wetland in November there is no way that vegetation could be present.

The Town of Yorktown had their environmental consultant from Barton and Loguidice perform a wetland delineation in March 2022. The town consultant determined that the wetland line presented as the NYSDEC required a field adjustment of approximately 6-7 feet further to the east. When we were presented with the proposed plans in July 2025 by a representative of Homeland Towers stating that they would not be in the wetlands, we were obviously surprised. We see the vegetation present every day during the growing season and as a result doubt the validity of their wetland line. As a result we hired an independent person to delineate the wetland, his report is attached. He clearly stated that due to the vegetation present that the wetland line is further to the east.

We are attaching a photograph showing some of the vegetation present east of Homeland Towers marked wetland line. As you can see skunk cabbage is abundantly present in the photograph. When we looked this plant up online the following information was available:

Yes, skunk cabbage (*Symplocarpus foetidus*) is a classic identifying plant for wetlands in New York, thriving in swamps, seeps, and wet floodplain forests, indicating consistently wet, mucky conditions and often appearing early in spring before other plants emerge. It's an "obligate wetland species," meaning you'll only find it in very wet habitats.

As an obligate wetland species it needs to be considered for any wetland delineation of this property. In New York, an obligate wetland species (OBL) is a plant that almost always occurs in wetlands (over 99% probability) under natural conditions, meaning they grow in standing water or saturated soils and are key indicators of wetland ecosystems for delineation purposes.

Based on all of the above information the current wetland delineation that is being submitted to the town for this project should be considered incomplete because it is lacking any information of the mandatory criteria of hydrophytic vegetation.

Additionally we oppose the proposed plan due to tree removal. The plan calls for the removal of over 80 mature trees in addition to numerous smaller shrubs, trees and plants that are integral to the area's stormwater management. 37 of these trees will be removed in the wetland buffer along our property line which will have a direct impact. These are trees that are 40 to 50 ft in height with deep root systems. As we are sure you are aware, the water table in this area is extremely high, even for those who live at the top of Granite Springs Rd. Our property which is situated in the wetland buffer is no exception. We have drainage around the foundation of our home to protect it from water infiltration. The removal of these trees that draw a large quantity of water from the water table will raise the level of water on our property. While we realize remediation is being presented, what is going to be installed cannot replace the water consumption nor the deep root systems of the existing trees.

We also have concerns that some of the remediation planting will be located directly on our property line and as these planting mature they will have significant encroachment on the use of our property, specifically the evergreen trees. As they grow the base will widen to a point of clearly crossing on to our property and limiting our usable space. We ask that they be required to be planted further away from our property line or that species be chosen that can provide screening of significant height that will not pose encroachment on to our property.

We urge the Town Board and Conservation Board to consider the effects that the construction of this driveway and operation of this cell tower would have on the Hallocks Mills Wetland, habitats, animals, environment and residents of this town. To fully appreciate how important this parcel of property is, we ask the Conservation Board the following:

1. Visit the proposed site before submitting any remarks or opinions to the town board.

2. We ask that the conservation board determine that the wetland delineation is incomplete at this time and require that the mandatory criteria of hydrophytic vegetation be included by performing a wetland delineation in the Spring or Summer when vegetation is present as NYSDEC recommends.
3. All interested parties should have a wetland expert present if so desired at the time of delineation for hydrophytic vegetation to ensure that there is a consensus. ( interested parties include the applicant, the town, adjoining property owner and NYSDEC)
4. We also urge the Town Board and Conservation Board to direct that the developer pay for an independent wildlife study done by someone the Conservation Board chooses.
5. We ask that remediation planting be situated further away from our property line or that species be chosen that can provide screening of significant height that will not pose encroachment on to or limit the use of our property.
6. Finally, that the Conservation Board request Johanna Duffy, Senior Environmental Scientist for Barton and Loguidice, report that was done based on her wetland delineation on March 2, 2022. Barton and Loguidice, who were hired as consultants for the Town of Yorktown to delineate the wetlands for this project

Thank you for your time and consideration.

Regards,  
Doug and Karen Erickson

All photos were taken on April 25, 2025. The first photo is taken from the perspective of standing east of the marked wetland boundary and facing west. The second photo is taken facing north and standing south in the wetland buffer. The third photo is taken facing east standing slightly south of the wetland marker.





