

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 roots 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.





