

(Town of Woodstock Letterhead)

June 2, 2026

Via email: planningzoning@townofulster.ny.gov

Frank Almquist, Chairman
Town of Ulster Planning Board
1 Town Hall Drive
Lake Katrine, NY 12449

**Re: Zena Development, LLC
Ruby Woods (off Eastwoods Drive) (38.1-1-38.100, 39.1-1-21.100)**

Dear Chair Almquist and Members of the Planning Board,

Please accept this letter on behalf of the Town of Woodstock Town Board (“Town Board”) regarding the proposal by Zena Development, LLC (“Zena”) for a proposed 30-lot residential subdivision (the “Project”). As you know, the Project is located within both the Towns of Woodstock and Ulster and is accessed solely through the Town of Woodstock. The Town Board requests that your Board give careful consideration to potential environmental and transportation impacts affecting Eastwoods Drive and other areas within the Town of Woodstock, consistent with its obligations under the State Environmental Quality Review Act (SEQRA).

Eastwoods Drive Does Not Comply with the Town’s Road Standards

The Woodstock Town Code prescribes minimum road standards to protect public safety and ensure adequate road conditions. § 202-32. Zena has requested several waivers from these standards. As discussed below, the Town Board has significant concerns regarding the requested waivers and their potential impacts on public safety and road infrastructure.

Eastwoods Drive is Not Designed to Handle 30 Additional Homes

Eastwoods Drive currently serves fewer than 11 homes and is classified as a Minor Road under Woodstock Town Code § 202-32.E(1). Minor roads are subject to less stringent design and construction standards than Major roads, which serve 11 or more lots and are intended to accommodate greater traffic volumes and heavier vehicle use.

The Project would create 30 new lots, far exceeding the threshold for a Major road classification. However, because Zena has requested a waiver from the Major road requirements, Eastwoods Drive is not proposed to be upgraded to meet those standards. Given the significant increase in traffic associated with the Project, the Town Board is concerned that a road designed for fewer than 11 lots may be inadequate to safely and effectively accommodate the anticipated demand. Nevertheless, Zena does not appear to propose, or commit to, any substantial reconstruction or redesign of Eastwoods Drive to address these impacts.

The Project also appears to run afoul of the NYS Fire Code, which requires developments of 30 or more lots to have at least **two** approved fire access roads. See Appendix D, § D107.1 of the New York State Fire Code. The Project is proposed to be served by a single access road, Eastwoods Drive, which as set forth above is not being upgraded to meet the Town's Major Road standards. It is unclear how building permits could be issued for the Project if it does not comply with the NYS Fire Code.

Eastwoods Drive is Narrow and Unpaved

Section 202-32.G(4) of the Woodstock Town Code requires Major roads to have a 50-foot right-of-way, a minimum 20-foot-wide paved travel surface, and two 4-foot-wide shoulders. Eastwoods Drive does not meet these standards. It is currently an unpaved dirt road, as narrow as 13.5 feet in some locations and lacking shoulders. It does not appear to be 20 feet wide at any point. In certain sections, vehicles cannot safely pass one another.

While these conditions may be currently manageable given Eastwood Drive's limited use, the addition of 30 new homes would substantially increase traffic and exacerbate its deficiencies. Moreover, Section 202-32.G(20) of the Woodstock Town Code requires roads serving 11 or more lots to be paved. The Project does not include paving or otherwise upgrading Eastwoods Drive to meet the standards applicable to a Major road, raising significant concerns regarding compliance with Woodstock's standards and the road's ability to safely accommodate the Project.

Eastwoods Drive is a Dead-End Road

Woodstock's road standards are designed, in part, to ensure adequate emergency vehicle access. Accordingly, Woodstock Town Code § 202-32.D(1) limits dead-end roads to 2,000 feet in length, while the Town of Ulster's own Code limits dead-end streets to 1,200 feet. Ulster Code § 161-19.E. Zena's proposal relies on a road approximately 9,000 feet in length that would function as a dead-end, requiring a waiver regardless of which standard is applied.

The Project also appears inconsistent with other access requirements. Section 202-32.C of the Woodstock Town Code requires subdivisions containing 20 or more lots to provide at least two connections to existing roadways. The Project would be served by a single access point - Eastwoods Drive. Similarly, Appendix D, § D107.1 of the New York State Fire Code generally requires developments containing 30 or more dwelling units to have two approved fire access roads.

Given that the Project would depend entirely on Eastwoods Drive for ingress and egress, any obstruction, such as a fallen tree, accident, or other blockage, could significantly impede emergency response and resident evacuation. These access and public safety concerns warrant careful consideration as part of the Project review. Additionally, a second access point would allow emergency responders from the Town of Ulster to serve the Project directly, rather than relying exclusively on emergency services provided by the Town of Woodstock. This is a significant consideration given that residents of the development would reside within the Town of Ulster and would not contribute tax revenue to support Woodstock's emergency service infrastructure.

Eastwoods Drive Does Not Have an Adequate Subbase

Section 202-32.G(19) of the Woodstock Town Code requires Major roads to include a 12-inch crushed stone subbase designed to support higher traffic volumes and heavier vehicles. We

understand that Eastwoods Drive, as an existing Minor road, was not constructed to those standards and is intended to serve a substantially lower level of traffic.

Approval of the Project would result in significant construction-related truck traffic, as well as increased long-term use by emergency vehicles, service vehicles, and residents. These demands could place substantial stress on a road not designed for such use. Moreover, Section 280-a of the New York Town Law prohibits the issuance of building permits unless the road providing access to the proposed development has been improved to the satisfaction of the Town or Planning Board in accordance with applicable local standards. Woodstock has incorporated these standards into its Town Code. See §§ 202-29A, 202-30, and 202-32.

Given the anticipated increase in heavy vehicle traffic and the importance of maintaining safe and reliable access, the Town of Woodstock has significant concerns regarding any waiver of the subbase requirements or other road standards applicable to Major roads.

General Environmental Considerations

Eastwoods Drive traverses the Zena Woods Critical Environmental Area (“CEA”), which contains wetlands, vernal pools, and other sensitive natural resources. Any expansion of the road or increase in traffic associated with the Project could adversely affect wildlife movement, particularly amphibian species that rely on interconnected vernal pools for breeding and migration. Increased traffic, lighting, and noise may further disrupt these sensitive habitats.

Road improvements may also encroach upon wetland buffer areas where wetlands closely abut Eastwoods Drive, creating potential impacts that warrant careful environmental review. In addition, road widening would likely require tree removal, resulting in habitat loss for songbirds and other species of concern known to inhabit the area, including red-shouldered hawks, scarlet tanagers, and bald eagles. The Town Board believes that these potential impacts on the CEA and its wildlife resources require thorough evaluation as part of the SEQRA process.

Intermunicipal and Property Interests

The Town Board is also concerned that the Project's implications for intermunicipal service arrangements and existing easements have not been adequately analyzed. Because Eastwoods Drive is located entirely within Woodstock and functions as a dead-end road, the burden of supporting emergency services could fall disproportionately on Woodstock despite the Project, and its tax revenue, being located within the Town of Ulster.

Furthermore, any proposal to widen Eastwoods Drive may be affected by existing easements for rights-of-way, utilities, and other purposes. A comprehensive review of these easements, as well as any applicable intermunicipal agreements, is necessary to fully understand the feasibility and impacts of the Project. Proceeding without such analysis would be premature.

Conclusion

The above cited deficiencies in the Project, particularly the access road, are substantial. These deficiencies cannot be remedied by a mere recitation of the need for waivers; such waivers, if granted would be enormous, and so would appear to violate the purpose of the code to ensure public safety. Accordingly, the Town Board believes that the Project raises significant transportation, environmental, public safety, and intermunicipal concerns relating to Eastwoods Drive. These issues should be fully evaluated through the SEQRA process before any final

decisions are made. The Town Board respectfully requests that the Ulster Planning Board give careful consideration to these concerns as it continues its review of the Project.

Sincerely,

Anula Courtis

Town Supervisor