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May 21, 2025

Mr. Joseph Hasenkopf, Chairman
(T) Cairo Planning Board
424 Main Street
P O Box 728
Cairo, New York 12413
Phone: 518-622-3120

Project No.: 2024050

Re: Site Plan Review – Blackhead Mountain Lodge - Site Plan Development
Town of Cairo, Greene County
Tax Parcel No. 116.16-1-1 --- 153 Bald Hill Road
Tax Parcel No. 116.00-1-24 --- 64 and 67 Crows Nest Road
Tax Parcel No. 116.00-1-25 --- 54 Crows Nest Road

Dear Mr. Hasenkopf and Planning Board Members:

Lamont Engineers, P.C. has reviewed various documents and site plan drawings, details and project supporting documentation and information provided to the Town of Cairo Planning Board by the Developer's Representatives, including but not limited to KARC Planning Consultants, Inc., LRC Group – Civil Engineer & Landscape Architects & Lighting, Crawford & Associates – Engineering & Land Surveying, P.C., Creighton Manning Engineering, LLP, Vida Master Planning and Design, Sterling Environmental Engineering, P.C., and RCBG JV Manager, LLC as the Owner/Developer of a Proposed Site Plan Development named "Blackhead Mountain Lodge", hereafter referred to as "BHML".

As discussed in previous project review correspondence, the application for Site Plan Review approval and Special Use Permit for the proposed development remains the same, involving a Hotel / Tourist Resort and Spa facility to be constructed on the lands and tax parcels described above, formerly known as the Blackhead Mountain Lodge and Country Club. Under the previous ownership, the facility included an 18-hole Golf Course and Country Club with 22 Guest Rooms, a Restaurant and Bar as well as a Fitness Center and Pool. The proposed project will include approximately 127-Key Hotel and Tourist Resort and Spa Units, a 66,270 SF Main Lodge Hotel, Water and Wastewater Treatment facilities, drainage systems, water and sewer infrastructure, approximately 280-vehicle parking areas for patrons and staff as well as onsite hiking and walking trails. Various onsite water features may be enhanced for aesthetic features and utilized as stormwater management systems, natural habitat for area wildlife, and irrigation resources where and if needed.

Our Project review is based on documents presented to the Town of Cairo Planning Board by the Project Team of Consultants dated 12/21/23 with various revisions through 4/22/25 including but not limited to:

- Site Plan and Special Use Permit Application dated December 21, 2023
- Full Environmental Assessment Forms (FEAF) Part -1, supporting documents and appendices dated December 21, 2023, with revisions to January 27, 2025
- Site Plan drawings dated 12/21/23 with various revisions through November 25, 2024
- Stormwater Pollution Prevention Plans revised through November 25, 2024
- Floodplain Mapping for (T) Cairo – Ref. FIRM Panel # 36039C0243F and 36039C239F dated 5/16/82008

- (T) Cairo Zoning Law – 2015, Updated to 2017
- (T) Cairo Zoning Mapping – Adopted 6/6/2017
- (T) Cairo Local Law # 2 of 1991 – Regulation of Dwelling Units
- (T) Cairo Site Plan Review Law (amended to 7/21/2010)
- Applicable sections of NYSDEC and NYSDOH Water and Wastewater Design Requirements
- Ten States Standards- Water Works – 2022
- NYSDOH State Sanitary Code – Part-5 and applicable Subparts for Drinking Water Supplies
- NYSDEC Water Withdrawal Permitting as it may apply
- NYSDEC and US Army Corps of Engineers – pertaining to Stormwater Management
- (T) Cairo Planning Board meeting minutes December 2023 through December 2024
- (T) Cairo Site Plan / Special Use / Change of Use Application Documents
- (T) Cairo Sign Regulation(s) - as/if applicable
- (T) Cairo Ordinance for the Dedication of Town Roads
- (T) Cairo Subdivision Law – 1990
- Cairo Water District Information – 1990
- Cairo Annual Drinking Water Quality Report – 2022
- (T) Cairo Water Regulations – Adopted January 2017
- (T) Cairo Planning Board – Stormwater Pollution Prevention Plan (SWPPP) Check List
- (T) Cairo Site Plan Review Check List
- Groundwater Resources Study and Protection Plan for (T) Cairo – 2009
- Sterling Environmental Engineering, P.C. – Water Supply & Hydrogeologic Reports – 11/1/2024, 11/19/2024, 1/17/2025 and revised to 2/5/2025
- Hanson Van Vleet, PLLC – Hydrogeologic Review Report – 2/6/2025

General Comments:

The comments herein are referenced from project information obtained from the Applicant as well as from various project related public meetings, conference calls, ZOOM meetings, correspondence to the Town Planning Board, etc., as well as discussions with the Applicant Representatives and/or regulatory agencies. Based on our review, we offer the following comments.

1. Proposed Site Plan Development review is based on the current and applicable local laws and ordinances as well as applicable sections of the New York State Department of Health – Design Handbook – 2012, NY State Dept. of Health (NYSDOH) Sanitary Code – Public Water Supplies and Wastewater Treatment Standards, New York State Department of Environmental Conservation (NYSDEC) – Design Standards for Intermediate Sized Wastewater Treatment Systems – March 5, 2014, and applicable sections of NYS Stormwater Design Manual (SWDM).
2. Proposed Site Plan development review included site grading for construction and development of Hotel and Tourist Resort and Spa units, various activity buildings, site drainage and stormwater management systems, interior roadways and pedestrian pathways, landscaping and natural habitat development, construction of parking areas, infrastructure stormwater and temporary material storage areas during construction.
3. Proposed Site Plan development review also included preliminary design development of infrastructure associated with potable water supply and treatment, fire protection water supply, and wastewater collection, treatment and discharges as permitted by NYSDOH and NYSDEC. There will be no connections to municipal water and/or sewer services under this application.

4. Proposed Action in its current design will not require NYS Attorney General review of services and operations of the facility as it pertains to the Homeowner Association (HOA). As currently presented, the facility and all amenities will be owned and operated by the Applicant and therefore, Key-Holders will not be responsible for Homeowner's Association and/or associated fees.

Application and FEAF Review:

5. The Application Package dated December 21, 2023 included Full EAF (FEAF) Part-1 documents prepared by the Applicant's Consultants (KARC Planning Consultants, LRC Group – Civil Engineering & Landscape Architects / Lighting, Crawford and Associates – Engineering & Land Surveying, PC, Creighton Manning Engineering, LLP, Vida Master/Planning + Design) submitted on behalf of the Owner – RCBG JV Manager, LLC. The FEAF Part-1 and supplemental information, revised to January 27, 2025.
6. As noted on the Site Plan(s), many of the existing onsite amenities such as existing buildings, etc. will be removed for the development of various new and/or updated facilities and/or infrastructure components. Some structures will remain as indicated along with access to existing roadways.
7. As noted in the Water and Wastewater (Sewer) System design, there will be no connection to a municipal water and/or sewer services. All water and sewer systems will be developed onsite.

FEAF Part 1

8. Part 1 (B) Government Approvals: The Applicant has indicated various involved and interested Local, Regional, State and Federal Agencies, including but not limited to Town Highway Dept, Town of Cairo Planning Board, possible Town Zoning Dept if area variances are needed, Town of Cairo Conservation Advisory Council (if such exists), Greene County Planning Commission (GML-239M referral), NYSDOH and NYSDEC, Greene County IDA, and US Army Corps of Engineers.
9. The Town of Cairo Planning Board distributed Lead Agency notification letters as required under SEQRA, and by resolution dated 1/4/2024, has declared itself the Lead Agency for this project.
10. Part 1 (E.3): The Applicant has indicated that there are no archeological or historical sites or districts near the proposed project site. (See NYSOPRHP letter dated 2/09/24; Ref. Appendix Q.1).
11. Appendices A through T were supplemented to FEAF Part-1 for additional project related, environmental information with revisions to January 27, 2025.

Stormwater Management

Review is Based on NYSDEC Standards and Definitions, 2016 NYS Standards and Specifications for Erosion and Sediment Control "Blue Book" and 2024 NYS Stormwater Design Manual (SWDM):

12. Based on SWPPP information provided to date (last revision 11/25/24), the SWPPP is a design document that will be amended and adjusted as-needed as the project progresses through Final Site Plan approval by the Town Planning Board and will be subject to review by the Town and NYSDEC through completed construction and until a Notice of Termination (NOT) is issued upon completed construction and acceptance by NYSDEC. The SWPPP design was based on implementation of various applicable stormwater management practices in accordance with applicable sections of the NYSDEC SPDES General Permit (GP-0-20-001, GP-0-25-001 or newer) and the NYS Stormwater Design Manual (SWDM).
13. Calculations for reduction of peak runoff have been provided throughout the project design and development. Based on information provided to date, the SWPPP appears to comply with the design

parameters for the various stormwater management system practices and various storm events. Any changes to the project design may require further review and shall be submitted to the Town Planning Board for review and must be reflected on the SWPPP plans and documentation maintained at the project site.

14. During construction, any changes in soil conditions and/or project design may require additional soil testing to confirm the various SWPPP design practices will be effective relative to site soil characteristics. The Applicant shall notify the Town Codes Office and/or Planning Board where soils conditions and/or design changes are necessary due to site conditions and/or adequacy of culvert design(s). Notification of changes to the Stormwater Management Plan (SWPPP) should be considered as a condition of Final Site Plan Approval.
15. Based on the Stormwater Management Plan presented and NYSDEC correspondence, it is our understanding that Ponds # 2 and # 6 will be under NYSDEC jurisdiction. As a condition of Final Approval, we suggest the Applicant provide NYSDEC acknowledgement and/or acceptance of stormwater system design elements relative to the Ponds.
16. Based on information provided to date, the various drainage swale design calculations appear to be consistent with the State Stormwater Design Manual. As a condition of Final Site Plan Approval, we suggest any changes in the overall project design that result in modifications to the stormwater management plan and/or management practices be submitted for Town and NYSDEC review prior to effecting any design changes and/or field implementation.
17. As indicated earlier, the stormwater design model used throughout the project is subject to change due to various site and/or soil conditions, whereby various bio-retention basins and underdrains may need to be adjusted. As a condition of Final Site Plan approval, we suggest the Applicant submit any/all modifications to the model for the 100-year storm event to the Town and NYSDEC for design review under the current NYS Stormwater Design Manual (SWDM) at time of construction.

Floodplain & Flood Hazard Area:

18. Based on information provided and as referenced to Appendix K – Flood Mapping, there are only a couple of small areas near the northwest and northeastern sections of the property, where the Shingle Kill stream is the closest to the property boundaries. The Flood Hazard Area along the Shingle Kill is Zone A with no defined Base Flood Elevation (BFE). The northwestern section is a Zone X with little-to-no Flood Hazard potential. The Shingle Kill and/or the Flood Hazard Area does not run through the project site. (Reference FIRM Panels #36039C239F and 36039C243F, dated 5/16/2008.)
19. Based on the aforementioned references, it does not appear that special building permits and/or Floodplain Construction Permits for construction will be within a Flood Hazard Area will be required for this project.

Plan Review - Ref. Article D – Site Plan Review Law:

20. Per Site Plan Review Law - Article D, Sections 5, 6, 7, 8 and 9 the Site Plan submitted for Planning Board approval shall include information listed within the referenced sections and/or the Site Plan Review Check List(s) unless expressly waived by the Planning Board based on a written request by the Applicant. Any waiver requests shall be presented to the Planning Board prior to request for Final Site Plan Approval.

As provided in Article D of the Site Plan Review Law, the Applicant submitted a written request for waivers on May 2, 2024 for Section 5 (i) - *location, design, type of construction and exterior*

dimensions of all proposed buildings and structures; Section 5 (bb) - elevations and façade treatment plans of all proposed structures, and also Section 8 (a) – elevations and and/or sections illustrating front, rear, and side profiles drawn to the same or larger scale as the site development plan as required by the planning board; elevations and/or sections clearly delineating the bulk height of all buildings and other permanent structures ... including the dimensions of any proposed signs. It is understood that such waivers were granted by the Planning Board.

21. In general, the Site Plan submitted and revised to November 25, 2024, has provided the design elements required for **Site Plan Approval and Special Use Permit** for the Town of Cairo.
22. The Potable Water and Fire Protection Water System(s) and Wastewater Treatment System will be developed by the Project Design Team in accordance with applicable NYSDOH and NYSDEC requirements. Ultimate design approval for the Public Water Supply and Wastewater Treatment Systems will be by NYSDOH and NYSDEC. Final Design Approval documentation from these agencies shall be provided to the Town of Cairo prior to issuing any building permits as a condition of the Final Site Plan Approval.

Summary:

Based on the information provided to date, including but not limited to the project application, site plan(s) dated December 21, 2023 and revised to November 25, 2024; FEAF's Part-1 dated December 21, 2023 and revised to January 27, 2025 with appendices and supplemental information through January 27, 2025, the application has provided general Site Plan design elements in conformance with the Site Plan Approval submission requirements for the Town of Cairo.

It is further understood that under the current property ownership and property management, a Homeowner Association (HOA) will not apply to the terms and conditions for the Hotel/Tourist Resort and Spa Key Units. If an HOA does become applicable, the terms and conditions of the HOA will be presented to the Town of Cairo Planning Board and Attorney for the Town for review prior to Final Site Plan Approval and/or issuance of any Building Permits. Agency approvals will be presented to the Town CEO, Town Planning Board and its Consultants relative to the Public Water Supply and Fire Protection System(s), as well as Wastewater Treatment System(s) as approved by NYSDOH and NYSDEC as conditions for Final Site Plan and Special Use Permit approval.

Please do not hesitate to contact me if you have any questions concerning our review of the project application and/or the comments above.

Sincerely,

Doug Van Deusen

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CC: (via email): Tal G. Rappleyea, Esq. – Attorney for the Town of Cairo
Natalie Quinn, Planner – KARC Planning Consultant, Owner Representative.
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