Chapter 1: Project Description

A. INTRODUCTION

On September 15, 2021, Keane Stud LLC, or the Applicant applied to the Town of Amenia Planning Board with the Application for a conventional non-realty subdivision—i.e., the Subdivision, or Proposed Action—of two existing tax lots: parcel numbers 132000-7166-00-403720 and 132000-7167-00-212034, referred to herein as parcel 403720 and parcel 212034 and collectively as the Site) (see **Figure 1-1**), located partially along Old Route 22 and partially along Depot Hill Road in the Town of Amenia, Dutchess County, New York.

The Site consists of a total of ±605.7 acres. The Applicant is proposing to subdivide the Site into a total of 27 lots:

- Twenty-three (23) residential-agricultural lots (designated as Lots 1 to 23);
- Two (2) existing equestrian lots (agricultural uses to remain) (Lots K-1 and K-2); and
- Two (2) forest conservation lots (to be preserved) (Lots F-1 and F-2).

As defined by the Town's Zoning Code, the Proposed Action includes the development of three Rural Lanes, along with equestrian trails, landscaping, and stormwater management practices. No other development of the Site or other construction activity is currently proposed by the Applicant.

The Applicant proposes to record a Declaration of Covenants and Restrictions (the Declaration) against the entire Site, which would restrict future residential development of Lots 1 to 23,[1] prohibit residential development on Lots K-1 and K-2, and prohibit any development on Lots F-1 and F-2. Over 90% of the Site would be permanently protected by virtue of the Declaration and applicable underlying regulations of the Town Zoning Code, ensuring that the vast majority of the land remains in agricultural or natural use, including through the protection of forested lands and natural vegetative buffers, thereby maintaining the rural character of the Site. The Applicant also proposes, as a condition of approval, to create a homeowner's association that would maintain the private roads (i.e., the Rural Lanes), and enforce the Declaration.

On November 30, 2024, the Town of Amenia Planning Board (aka the Planning Board) was designated the SEQRA Lead Agency for coordinated review of the Proposed Action. By

[1] Any future development of Lots 1 to 23, K-1 or K-2 would require site plan approval from the Planning Board, as well as other necessary permits (e.g., DCDOH). Pursuant to Section 121-65.A(2) of the Town Zoning Code, agricultural structures with a footprint less than 10,000 square feet do not require site plan approval, and those with a footprint greater than 10,000 square feet require only minor site plan approval. Therefore, all references to required site plan approval of proposed improvements are qualified by the foregoing provisions of Section 121-65.A(2) of the Town Zoning Code.

resolution adopted on September 10, 2025, the Planning Board adopted a positive declaration of environmental significance (the "Positive Declaration"), thereby determining that the Proposed Action has the potential to result in one or more significant adverse environmental impacts and requiring the preparation by the Applicant of an Environmental Impact Statement ("EIS"); see **Appendix 2**. A draft Scoping Document was prepared to guide the preparation of the DEIS. As set forth in the SEQRA regulations, the primary goals of the scoping process are to focus a draft EIS on potentially significant adverse impacts and to eliminate consideration of those impacts that are not significant or that are irrelevant.

As required by SEQRA regulations, the Planning Board held a public scoping session on October 22, 2025 for the purposes of receiving oral comments on the draft Scoping Document. The Planning Board accepted written comments on the draft Scoping Document through October 29, 2025. On December 10, 2025, the Planning Board adopted the final Scoping Document, which sets forth the analyses required in the DEIS (see **Appendix 1**).

Solely for purposes of SEQRA review and the DEIS, the Proposed Action includes the Applicant's proposed subdivision as well as a conceptual future build-out (discussed further below) of the 23 residential-agricultural lots (Lots 1 to 23) by one or more of the future owners of the lots. Where required in the Scoping Document, the potential impacts associated with the conceptual future build-out of these lots have been analyzed.

In addition to preparing a detailed analysis of the potential environmental impacts of the Proposed Action, the DEIS addresses in Chapter 6, "Alternatives," the following alternatives to the Proposed Action as required by the final Scoping Document and SEQRA regulations: the No Action Alternative; the Conservation Subdivision Scenario; the Conventional Subdivision with Resort Development Overlay (RDO) Scenario; and the Alternative Future Build-Out with Limits on Lots 20 to 22. As discussed in Chapter 6, "Alternatives," the Applicant has concluded that certain of the alternatives (or elements of the alternatives) required by the final Scoping Document to be addressed in the DEIS are not "feasible, considering the objectives and capabilities of" the Applicant (6 NYCRR Section 617.9(b)(5)(v)).

Prior to the Positive Declaration, the Applicant and its consultants engaged in extensive pre-application and formal Application review processes spanning nearly five years, during which numerous technical studies were completed by the Applicant's consultants and reviewed by the Planning Board and its consultants. Among other topics, these studies addressed aquifer recharge, traffic, wetlands, ecology, archaeology, and visual resources, and were evaluated by the Planning Board in completing the FEAF Parts 2 and 3 for the Proposed Action. Based on that review, the Planning Board determined that these topics did not have the potential to result in significant adverse impacts and, accordingly, they are not required to be addressed in this DEIS. Where relevant, those prior studies are identified and referenced in this document. The primary technical study underlying this DEIS is the Conservation Analysis entitled "Keane Stud Subdivision Conservation Analysis," prepared by Rennia Engineering Design, PLLC, dated October 19, 2021, last revised May 5, 2023 (aka the Conservation Analysis), which was reviewed and accepted by the Planning Board pursuant to Planning Board Resolution #9 of 2023 adopted August 9, 2023 as the Conservation Findings. The Conservation Findings are incorporated herein by reference. The Conservation Analysis and adopted Conservation Findings are in **Appendix 3**.

B. LOCATION AND SITE DEFINITION

SITE

The Site consists of approximately 605.7 acres in two existing lots: parcel 403720 and parcel 212034. The Site is located partially along Old Route 22 and partially along Depot Hill Road in the Town of Amenia (see **Figure 1-1**). The Site is currently used for and improved with existing residential buildings, equestrian facilities, paddocks, and other agricultural uses, and is surrounded by low-density residential and agricultural uses (see **Figure 1-2**). The northwestern area of the Site, and portions of the eastern and southern areas of the Site, are farmed for row crops (see **Figure 1-3**). The southwestern portion of the Site is used for equestrian uses, including a large paddock and various equestrian buildings. The eastern portion of the Site, as well as the perimeter along the south, are mostly forested land, with areas of brush interspersed. There are a few ponds on the Site, as well as a wetland area in the northwestern corner of the Site (see **Figure 1-3**). Portions of the Site contain "Prime Agricultural Soils" and "Soils of Statewide Importance" (see **Figure 1-4**). The Site ranges in elevation from approximately 514 feet to approximately 1,226 feet. There are some steep slopes present, primarily on the Site's eastern, forested portion (see **Figure 1-5**).

ZONING

The Site is located within the Town of Amenia's Rural Residential "RR" and Rural Agricultural "RA" zoning districts. Portions of the Site are within the Scenic Protection Overlay District (SPO), the Stream Corridor Overlay District (SCO), the Resort Development Overlay District ("RDO), and the Aquifer Overlay District (AQO) (see **Figures 1-6a to 1-6e**).

General descriptions of these zoning districts are provided below. Refer to Chapter 3 of this DEIS, "Land Use, Zoning, and Community Plans," for additional information and analysis of compliance of the Subdivision with the Town Zoning Code.

The purpose of the RR District (± 28.3 acres, or 4.6%, of the Site) is "to allow residential uses in a rural setting, at a lower density than is allowed in the hamlets" (Town Zoning Code § 121-7). The minimum lot size in the RR District is 5 acres (Town Zoning Code § 121, Attachment 2).

The purpose of the RA District (± 577.4 acres, or 95%, of the Site) is to "maintain the Town's working landscape by promoting agriculture, forestry, recreation, land conservation, and low-density residential uses, as well as compatible open space and rural uses, by encouraging such activities and discouraging large-scale residential development" (Town Zoning Code § 121-7). The minimum lot size in the RA District is 10 acres (Town Zoning Code § 121, Attachment 2). Under the Town Zoning Code, in the RA District, a Conservation Analysis of the affected site is required to be prepared by the applicant for approval of a conventional "major subdivision" to identify lands with conservation value, including agricultural soils, and determine appropriate preservation strategies. A Conservation Analysis was prepared for the Site by the Applicant, and on August 9, 2023, the Planning Board adopted the Conservation Findings under Town Zoning Code Section 121-20(A)(4) based on the Conservation Analysis.

The purpose of the SPO District (± 491.9 acres, or 81%, of the Site) is to "regulate land uses within designated scenic areas to protect the Town's scenic beauty and rural character" (Town Zoning Code § 121-14.1). The SPO District is intended to apply to areas that are

visible to the public and that substantially retain their scenic character and/or that lie within important scenic viewsheds (Town Zoning Code § 121-14.1(A)).

The purpose of the SCO District (± 25.2 acres, or 4.2%, of the Site) is to "regulate land uses within stream corridors to protect water quality, scenic resources, and the overall appearance of the community, as well as to reduce the risk of damage from flooding" (Town Zoning Code § 121-14(A)).

The purpose of the RDO District (± 445.6 acres, or 73.6%, of the Site) is to "provide use and design flexibility to encourage resort development that fits into the rural character of the Town and protects its scenic, historic, and environmental resources, [and provide] a procedure for master planned development of large properties to promote tourism, recreation, and open space and natural areas protection" (Town Zoning Code § 121-7). The RDO District permits large-scale resort developments that incorporate design elements of Traditional Neighborhood Development ("TND") while accommodating the unique characteristics of resort uses. The Proposed Action is a conventional subdivision that complies with all use and dimensional requirements of the RR and RA Districts, and does not need to rely on or utilize the additional design flexibility of the RDO District.

The purpose of the AQO District (entire Site) is "to protect the Town's groundwater aquifer system, to provide the most protective standards to those areas of the aquifer at greatest risk of contamination, and to manage development so that groundwater supplies are not depleted or degraded" (Town Zoning Code § 121-15(A)). The Site contains two aquifers specified in the AQO District: Primary Valley Bottom Aquifer (± 486.8 acres) and Upland Aquifer (± 118.9 acres).

SITE SURROUNDINGS

As described further in Chapter 3, "Land Use, Zoning, and Community Plans," surrounding land uses transition from existing and emerging development centers to the north (Amenia Town Center) and west (Silo Ridge Field Club, west of NYS Route 22) to large, mostly forested parcels over 5 acres to the south and east. On the east side of NYS Route 22, between Silo Ridge Field Club and Old Route 22 and the Site, are agricultural uses, consisting of approximately 178 acres of fields surrounding residential and agricultural structures; an approximately 68.5-acre industrial property that contains an active sand and gravel mining operation (owned by County Organic Recycling); and smaller single-family residential lots of approximately 1 to 5 acres. To the south of the Site, along the Old Route 22 corridor, land use transitions from the sand and gravel mining operation to additional residential uses on large lots, small and large working farms with residential and agricultural structures embedded within cropland, and forested lands.

C. SUBDIVISION, DECLARATION AND HOMEOWNER'S ASSOCIATION

SUBDIVISION

As discussed above, the Applicant proposes a conventional non-realty subdivision of the Site into a total of 27 lots (see **Figure 1-7**):

- 23 residential-agricultural lots (designated as Lots 1 to 23);
- 2 existing equestrian lots (agricultural uses to remain) (Lots K-1 and K-2); and
- 2 forest conservation lots (to be preserved) (Lots F-1 and F-2).

The proposed lots meet or exceed the dimensional requirements under the Town Zoning Code, and no area (or use) variances are required. Each of the proposed lots exceeds five acres, requiring only a "Permission to File" from DCDOH. The Applicant is not currently proposing construction of residences or of any agricultural or equestrian facilities or structures. Any such future construction by a lot owner would require site plan approval from the Planning Board, as well as necessary permits from other governmental agencies (i.e., DCDOH).

The lots are proposed to be accessed via three Rural Lanes; in conformance with Town Rural Siting Principles (Town Zoning Code § 121-31(A)-(G)) these are mostly comprised of existing farm roads, and provide sufficient frontage for each proposed lot. The Proposed Action also includes the installation of equestrian trails, site landscaping improvements, and required stormwater management practices. No other development of the Site or other construction activity is proposed as part of the Application.

The Proposed Action is intended by the Applicant to be an integral part of the larger Amenia community by virtue of its consistency with existing land use patterns. The equestrian use of Lots K-1 and K-2 and anticipated future equestrian uses on some of the residential-agricultural lots would mediate between agricultural and residential uses. Over 90% of the Site would be permanently protected by virtue of the Declaration and applicable underlying regulations of the Town Zoning Code, ensuring that most of the land remains in agricultural or natural use, including through the protection of forested lands and natural vegetative buffers, thereby maintaining the rural character of the Site.

The Applicant anticipates that Rural Lane construction and subdivision infrastructure improvements (stormwater, equestrian trails, site landscaping) would be completed in a single initial phase following receipt of all required approvals, but that future development of the 23 residential-agricultural would occur gradually over time, subject to market conditions and individual lot owner decisions. Residential development on the individual lots would thereafter occur by lot owners on a lot-by-lot basis. The Applicant does not anticipate that at any time there would be more than 3 to 5 lots under simultaneous active construction. All construction activity would be subject to a SWPPP filed pursuant to NYSDEC SPDES General Permit GP-0-25-001, which requires erosion and sediment control measures throughout construction. Old Route 22 and Depot Hill Road would be the primary access roads. Dust control, noise management, and construction hour restrictions consistent with Town of Amenia Code requirements would apply during construction.

DECLARATION

The Applicant proposes to record the Declaration against the entire Site, which would restrict future residential development of Lots 1 to 23, prohibit residential development on Lots K-1 and K-2, and prohibit any development of Lots F-1 and F-2. The Declaration is not required by the Town Zoning Code, but rather has been voluntarily offered by the Applicant to avoid or mitigate certain of the potential environmental impacts of the Subdivision and of future development of Lots 1 to 23, K-1 and K-2, including potential impacts to natural resources, visual resources, and community character, as well as ensure continued agricultural and equestrian uses of the Site. The Declaration was developed in collaboration with the Planning Board prior to the formal commencement of the SEQRA process. Among other things, the Declaration would preserve forest conservation areas (Lots F-1 and F-2) and create a restricted residential development area within each of Lots 1 to 23 that is not greater than

10% of the area of the lot (the RDA), and additional areas in which all vertical development of any kind is restricted (see **Figure 1-8**).

The terms and provisions of the Declaration evolved directly from the Applicant's preparation of the Conservation Analysis and the review by the Planning Board of that document and of the Application, leading almost 2 years after submission of the Application to the adoption of the Conservation Findings on August 9, 2023. The current form of the Declaration is included as Appendix B to the final Scoping Document found in **Appendix 1**.[2] The Declaration would require future development to comply with certain special design standards in addition to complying with the Town Zoning Code. The proposed design standards would all exceed all applicable requirements of the Town Zoning Code. The Declaration would ensure that any future development of the residential-agricultural lots is consistent with the character in the area, including architectural scale. To accomplish this, the proposed Declaration includes restrictions on the size of building footprints, building height limitations, color restrictions, and other special architectural standards. Specifically, in the Declaration, each of the 23 residential-agricultural lots (defined as "Farmstead Lots" in the Declaration) has a designated "Residential Perimeter" within which the RDA (discussed above) must be located. The RDA of each lot is located within the area of the Residential Perimeter having the least slope, and may only be improved with not more than one principal single-family residence and permitted secondary residence or guest-house and accessory uses.

To realize the Applicant's vision of promoting and protecting agriculture, and to respect the agricultural nature of the Site and its surrounding, pursuant to the Declaration, the portion of each residential-agricultural lot outside the RDA of that lot is the designated "Agricultural Area" (as defined in the Declaration) of the lot. The Declaration restricts the use of Agricultural Areas to open space, passive recreation, cultivation, specialized agriculture, production of hay, commercial or non-commercial animal husbandry, horse breeding and horse riding, and structures accessory to the permitted uses in the Agricultural Area. The Declaration further identifies an extensive list of "Prohibited Uses" of the Agricultural Area including large commercial dairy farming, private zoos and wild animal farms, and breeding, raising, or boarding exotic animals.

The design standards for the residential-agricultural lots set out in the Declaration respond to comments and recommendations of the Planning Board and its consultants, are comprehensive, and serve to mitigate any potential impacts to the scenic character of the Site, including the following limitations:

- Color and Building Materials: No exterior materials shall be plastic or have a high gloss, glare, or reflective "mirror" type finish, and all exterior finishes shall be neutral colors.
- Fencing and Landscaping: Fencing type is regulated, and fencing shall be made of wood, except for modifications needed for agricultural practices, and may not be painted white. At least two large trees (35 feet in height, or greater, at maturity) must be planted per

[2] As discussed in Chapter 2, "Visual Impacts," as a result of the visual impact assessment performed for this DEIS and in response to comments of the Planning Board, its consultants, and the public comments received during the Application review process prior to the acceptance of this DEIS, certain revisions to the Declaration are now proposed (see **Appendix 5**), all of which would serve solely to further restrict future development on the Site by increasing the extent of a development restriction or limitation, and would therefore constitute additional mitigation for potential visual impacts of the Conceptual Future Buildout Scenario that is made part of the Proposed Action.

1,000 feet of residential floor area proposed on a lot. Owners must preserve existing stone walls and hedgerows as traditional landscape features.

- Architectural Elements: Roof forms are limited to specific types (e.g., gable, clipped gable, gambrel, hipped forms), door types are regulated, and specific width to height proportions are applicable to windows. Additionally, only specific window types are permitted.

Any proposed future improvements on each lot would be subject to site plan review and approval by the Planning Board. The Declaration would require the application of Town Rural Siting Principles, would prohibit the further subdivision of the lots, and would set forth specific dimensional restrictions for each residential-agricultural lot.

HOMEOWNER'S ASSOCIATION

The Applicant proposes to create an HOA pursuant to New York Not-for-Profit Corporation Law. The HOA will be responsible for: (a) ownership and maintenance of the Rural Lanes and associated stormwater management infrastructure; and (b) enforcement of the Declaration against all lot owners. The Town of Amenia will be named as a third-party beneficiary of the Declaration, providing the Town with independent enforcement authority in the event the HOA fails to act. In the event the HOA is dissolved or becomes insolvent, enforcement rights will vest in the individual lot owners collectively, with the Town retaining its independent enforcement authority as named beneficiary under the Declaration. These provisions ensure that the Declaration's protections of more than 90% of the Site as agricultural land/open space are durable and enforceable in perpetuity. A draft HOA declaration will be provided to the Planning Board for review prior to final subdivision approval.

DECLARATION ENFORCEABILITY AND LONG-TERM DURABILITY

The Declaration proposed by the Applicant is the primary mechanism by which more than 90% of the Site will be preserved as open space and agricultural land in perpetuity. Because the Declaration is the central mitigation measure for the Proposed Action, its long-term durability and enforceability are addressed herein.

Enforcement Rights. The Declaration will be recorded against all 27 lots in the Dutchess County Clerk's office and will run with the land, binding all current and future owners of each lot. Enforcement rights will be held by: (a) a homeowner's association, as the primary enforcement entity; (b) individual lot owners, who may enforce the Declaration's provisions against other lot owners; and (c) the Town of Amenia, which will be identified as a third-party beneficiary of the Declaration with independent enforcement authority. The Town's status as a named beneficiary means the Planning Board and Town legal counsel may take action to enforce the Declaration's restrictions without relying on the HOA or individual lot owners.

HOA Formation and Continuity. The HOA will be formed as a not-for-profit corporation under New York law prior to the first sale of any lot. The Applicant will provide a draft HOA Declaration to the Planning Board for review prior to final subdivision approval. In the event the HOA is dissolved or becomes insolvent, the Declaration's provisions will remain in effect and will be individually enforceable by lot owners and by the Town as named beneficiary.

Modification and Extinguishment. The Declaration may only be modified or extinguished by a proceeding in a court of competent jurisdiction or by agreement of all lot owners and the Town. Its terms are intended to be permanent and may not be modified by HOA action alone.

No Further Subdivision. The Declaration expressly prohibits further subdivision of any lot. Lot assembly (acquisition of multiple lots by one owner) is permissible but does not alter the Declaration's restrictions on development within each lot's established RDA and Agricultural Area.

Compliance Monitoring. Individual lot owners and the HOA will be responsible for ongoing compliance with the Declaration's agricultural use requirements. The Declaration's requirement that each lot's Agricultural Area be maintained in active agricultural or open space use provides a self-enforcing mechanism through which adjacent lot owners have standing to bring enforcement actions.

The Declaration constitutes a durable, legally enforceable mitigation measure that will protect the Site's open space and agricultural resources in perpetuity.

D. CONCEPTUAL FUTURE BUILDOUT SCENARIO

Solely for purposes of SEQRA and evaluation in this DEIS, the "Conceptual Future Buildout Scenario" (which is not part of the Proposed Action) is the conceptual future construction of homes and associated development on the 23 residential-agricultural lots. The Conceptual Future Buildout Scenario was developed by the Planning Board and its professional consultants with input from the Applicant, and was made Appendix A to the final Scoping Document (see **Appendix 1**). The Conceptual Future Buildout Scenario does not necessarily reflect the Applicant's expectations for future development by lot owners, but is instead intended only to be a reasonable worst-case development scenario for certain relevant impact analyses in this DEIS. The Conceptual Future Buildout Scenario assumes that future development would be subject to the Declaration and to future Planning Board lot-by-lot site plan review.

The Conceptual Future Buildout Scenario makes development assumptions for each residential-agricultural lot by specifying the future improvements to each lot and requires those improvements to be included in a required rendering for each lot. For example, for Lot 1, the rendering is required to include the following:[3]

- Driveway with parking court;
- Principal residence (footprint size and height), attached garage, and patio (footprint size);
- Secondary residence (footprint size and height);
- Pond (size) or pool with fence (size);
- One non-agricultural accessory structure (i.e., garage, pool house) (footprint size and height);
- Equestrian barn with gravel path (footprint size and height);
- Two run-ins (footprint size and height);
- Equestrian paddocks (wood fence enclosure) (size);
- 22 trees (size);

[3] Notations of (footprint size), (height), (size), etc., reflect that the Conceptual Future Buildout Scenario identifies specific sizes for each element that are to be rendered.

- Tennis Court with landscape fence (size); and
- Grass fields outside of developed areas.

The Conceptual Future Buildout Scenario for all 23 residential-agricultural lots, including lot acreage, RDA size, and primary conceptual development program elements, is provided as Appendix A to the final Scoping Document included in **Appendix 1**, which contains the lot-by-lot conceptual buildout program adopted by the Planning Board. The lot-by-lot program was developed collaboratively between the Applicant's visual consultant (Saratoga Associates) and the Planning Board's visual consultant (George Janes) and reflects the parameters established for analysis of visual impacts in Chapter 2, "Visual Impacts." The Conceptual Future Buildout Scenario models the following requirements: (1) roof and building colors are required to be reasonable worst-case assumptions for visibility using only the permitted color palette; (2) proposed landscaping is required to be shown the size at the time of planting, or, only in addition to those images with landscaping aged; and (3) grading, retaining walls and land disturbance (roads and gravel paths) are required to be integrated into the 3D model.

E. PROPOSED ACTION PURPOSE AND NEED

The purpose of the Proposed Action is to create very large residential-agricultural lots on which future lot owners could develop residential and agricultural uses and structures within a small community of similarly used and developed lots, centered around existing and continuing equine and agricultural use. The Applicant has concluded that there is sufficient demand for the type of large equestrian and agriculturally oriented residential lots it proposes.

It is also noted that public goals for the Site are expressed in recommendations of the the Town's 2007 Comprehensive Plan Update (the "Town Comprehensive Plan"), and are consistent with the Proposed Action.[4] Among the goals that relate to the Site are the following:

- *Goal 1: Achieve a broad-based balance between the rural, historic, and agricultural beauty of the town as it is and the need for appropriate and smart economic growth and development.* (pg. 5)
- *Goal 3: Develop and encourage the growth of agriculture as a profitable business within the context of preserving open space.* (pg. 5)
- *Goal 4: To encourage more housing.* (pg. 5)
- *Goal 5: To maximize our strengths and attract tourists, shoppers, athletes, lovers of good food and wine, historians, and other money-spenders.* (pg. 6)

  Additionally, although the Proposed Action would not be either a "large-scale resort" or be solely a "second-home development project," the following goal of the Town Comprehensive Plan is relevant:

  > *[the development should] be designed in a way that does not detract from the scenic character of the community. Protection of most of the landscape as open space, either as recreational land for golf, or forest lands, or for farming and equestrian activities, will help maintain the scenic character of what is widely*

[4] *Town of Amenia Comprehensive Plan*, available at: https://www.ameniany.gov/comprehensive-plan/.

> *regarded as the Town's most important viewshed, i.e., the views from the top of Delavergne Hill, down the Harlem Valley, and across the Valley to Depot Hill.* (pg. 10)

Furthermore, as confirmed by the Conservation Findings, a conventional subdivision—rather than a conservation subdivision or resort development—has been determined by the Planning Board to be the appropriate type of development for the Site, consistent with RA District and RR District regulations and other applicable requirements of the Town Zoning Code. The RA District is the primary underlying zoning district encompassing 95% of the Site, and the Proposed Action fully complies with all use and dimensional requirements of that district. No use or area or variances are required for the Proposed Action.

F. SUMMARY OF REQUIRED APPROVALS

The approvals required for the Proposed Action, as well as the Involved Agencies responsible for these approvals and Interested Agencies, are shown in **Table 1-1**, below.

Table 1-1
Involved and Interested Agencies and Approvals

Involved Agencies	Approval/Review
Town of Amenia Planning Board	Subdivision Approval
Town of Amenia Highway Department	Rural Lane Connection Acceptance
Dutchess County Department of Health	Permission to File
Dutchess County Department of Public Works	Potential County Road Improvements
NYS Department of Environmental Conservation	Stormwater approval (SPDES GP 0-25-001)
NYS Office of the Attorney General	Approval of Homeowner's Association
NYS Historic Preservation Office	Cultural Resources Review
US Army Corps of Engineers	Wetland Crossing Improvement
Dutchess County Planning Department	General Municipal Law §239
Interested Agencies	
Town of Amenia Zoning Officer / Code Enforcement Officer	
US Fish and Wildlife Service	

G. APPLICATION HISTORY

As previously stated, the Applicant submitted the Application to the Planning Board on September 15, 2021. The initially proposed 32-lot conventional subdivision of the Site was first reviewed by the Planning Board at its October 13, 2021 meeting (see **Figure 1-9**). As required by §121-19.A(2) of the Town Zoning Code, the submission of the Application began the conservation analysis process, which is required for all proposed conventional major subdivisions in the RR and RA Districts. The Applicant subsequently submitted a draft Conservation Analysis on October 19, 2021, and then submitted revised versions, in response to feedback from the Planning Board and its consultants, dated January 1, 2022, July 25, 2022, February 21, 2023, and May 5, 2023.

The Application and revised versions of the Conservation Analysis (referenced above) were reviewed by the Planning Board at its meetings on January 12, 2022, March 23, 2022, July

13, 2022, and August 10, 2022. At the August 10, 2022 meeting, the Planning Board requested additional visual analysis and renderings of the Proposed Action. The Applicant returned to the Planning Board on January 11, 2023 to discuss revisions to the Conservation Analysis and other materials supporting the Application made by the Applicant and its consultants over the previous 5 months. At that meeting, the Planning Board requested that the Applicant make further modifications to the Conservation Analysis and provide additional visual analysis. The Applicant submitted a revised Conservation Analysis on May 5, 2023, and appeared at the May 24, 2023 Planning Board meeting to present and discuss it. At that meeting, the Planning Board directed its consultants to prepare conservation findings. The Applicant resubmitted the proposed Conservation Analysis on May 30, 2023. On July 12, 2023, the Applicant appeared before the Planning Board to discuss revisions to the Conservation Analysis made in response to Planning Board and consultant comments. At that meeting, the Planning Board authorized the preparation of a resolution accepting the Conservation Analysis for consideration at its meeting on July 26, 2023, which was subsequently cancelled.

On August 9, 2023, the Planning Board adopted Resolution No. 9 of 2023, accepting the Conservation Analysis and adopting Conservation Findings for the Proposed Action determining, among other things, that a conservation subdivision of the Site is not required and that the Conservation Analysis adequately identifies lands to be protected from development.

Following the Applicant's submission of a proposed preliminary plat, FEAF, and Proposed Action narrative, the Planning Board at its meeting on September 27, 2023 commenced review of the Proposed Action under SEQRA by resolving to serve as Lead Agency and classifying the Proposed Action as a Type 1 action under SEQRA.

On October 24, 2023, the Planning Board commenced coordinated review of the Proposed Action under SEQRA by authorizing the circulation of a "Notice to Designate a SEQRA Lead Agency" to involved agencies, and identified the following agencies/parties as involved or interested in the environmental review of the Proposed Action:

- Town of Amenia Zoning Officer/Code Enforcement Officer
- Town of Amenia Highway Department
- Dutchess County Department of Health (DCDOH)
- Dutchess County Planning Department (DCDP)
- Dutchess County Department of Public Works (DCDPW)
- New York State Department of Environmental Conservation (NYSDEC)
- New York State Historic Preservation Office (NYSHPO)
- U.S. Fish and Wildlife Service (USFWS)
- U.S. Army Corps of Engineers (USACE)

On or about November 8, 2023, the Planning Board received consents to SEQRA Lead Agency status from the DCDPW, Town of Amenia Highway Department, and Town of Amenia Zoning/Code Enforcement Officer. No involved agency objected to the Planning Board serving as Lead Agency.

On or about April 12, 2024, the Applicant provided for the Planning Board's review (1) a viewshed map prepared by its visual consultant Saratoga Associates, identifying viewpoints

from which a theoretical future buildout of the Proposed Action might be visible based on regional topographic and land coverage data sources; and (2) Saratoga Associates' proposed methodology for a visual impact analysis including the proposed theoretical future buildout scenario to be assessed.

At the Planning Board meeting on May 22, 2024, the Applicant received comments on the scope of the visual impact analysis for a theoretical future buildout scenario of the Proposed Action from the Planning Board and the Planning Board's visual impact consultant (George Janes, AICP), consulting engineer (John Andrews, P.E.), and attorney (Paul Van Cott).

In response to these comments, Saratoga Associates subsequently prepared and the Applicant submitted to the Planning Board on June 10, 2024, a proposed theoretical future buildout scenario for purposes of SEQRA review (that would ultimately evolve into the Conceptual Future Buildout Scenario addressed in this DEIS), including a spreadsheet containing the size of each proposed lot and RDA, the elements of the theoretical buildout scenario to be rendered for each proposed lot, and the footprint, height, and style of principal and accessory structures.

Prior to the Planning Board's June 26, 2024 meeting, the Applicant received written comments from Mr. Janes and Mr. Van Cott regarding the initial theoretical future buildout scenario, suggesting that the Planning Board expand the scope of the visual impacts analysis. In response to these comments, the Applicant next appeared before the Planning Board on October 23, 2024. At that meeting, the Applicant and its design consultant, Hart Howerton, presented the Applicant's vision for development of the Proposed Action by future lot owners and discussed potential mitigation for areas of concern.

On March 17, 2025, the Applicant submitted a revised preliminary subdivision plat, an illustrative master plan for the theoretical future buildout scenario with visual simulations and renderings produced by Saratoga Associates, and a draft of the proposed Declaration containing corresponding development restrictions to mitigate impacts of future buildout, including visual impacts. The revised plat reduced the number of proposed lots from 32 to 27, and made changes to the layout of the proposed lots in response to comments from the Planning Board and its consultants regarding potential impacts of, and community preferences for, future development, including the preservation of existing fields. The Applicant's engineering consultant supplemented its submission on April 15, 2025 with an illustrative subdivision plan and written narrative addressing mitigation of potential impacts on aesthetic resources.

The Applicant next appeared at the April 23, 2025 Planning Board meeting. At that meeting, the Planning Board reviewed the proposed Declaration and the visual renderings (photosimulations) prepared by Saratoga Associates to assess how the restrictions set forth in the Declaration would reduce potential visual impacts. At that meeting, Mr. Janes provided comments regarding the Declaration and photosimulations. By letter dated May 6, 2025, the Applicant responded to the comments raised by Mr. Janes.

The Applicant attended subsequent meetings of the Planning Board on June 11, 2025, and June 25, 2025, to further discuss the Proposed Action and comments from the Planning Board's consultants. In response to those comments and a comment memorandum from Mr. Janes dated July 23, 2025, on July 28, 2025, the Applicant submitted (1) an updated FEAF Part 1, (2) a narrative to support the Planning Board's preparation of FEAF Part 2, (3) a response letter from Saratoga Associates, and (4) an updated theoretical future buildout

scenario. Mr. Janes subsequently provided a comment memorandum dated August 25, 2025. On August 13, 2025, in anticipation of a positive declaration of environmental significance, the Applicant submitted a draft Scoping Document prepared by AKRF.

The Applicant appeared at the August 27, 2025 meeting of the Planning Board for the review of the visual impact analysis and of the FEAF Part 2. At the August 27, 2025 meeting, the Planning Board indicated two issues of concern in addition to potential visual impacts—potential traffic impacts and impacts to and human health. In response to those concerns, the Applicant submitted a memo prepared by AKRF, dated September 3, 2025, with a revised FEAF Part 1, providing additional information for use by the Planning Board in preparing the FEAF Part 2.

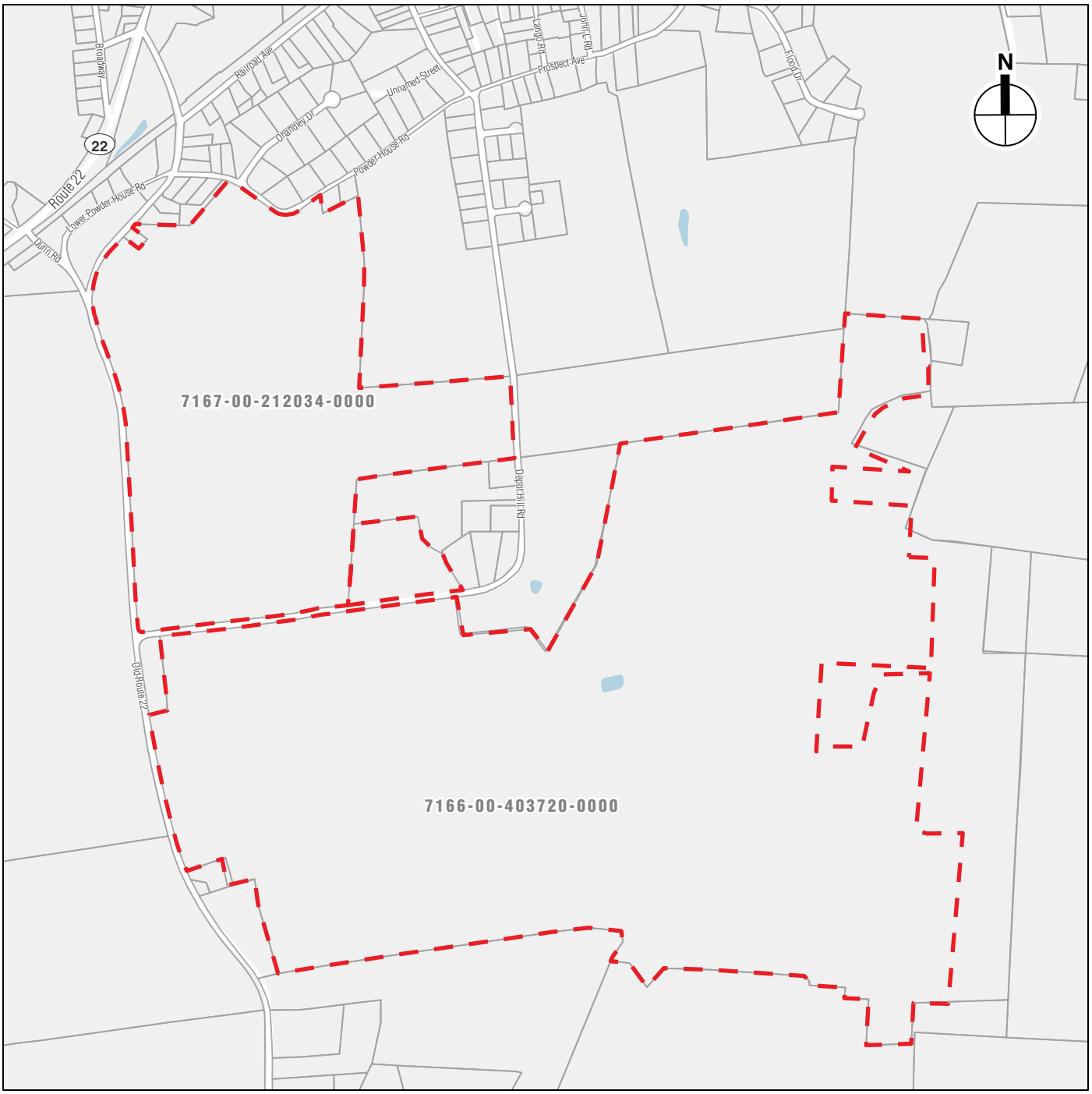
On September 10, 2025, the Planning Board adopted FEAF Part 2 and by Resolution No. 18 of 2025, adopted a positive declaration of environmental significance requiring the preparation of this DEIS.

On September 25, 2025, by Resolution No. 19 of 2025, the Planning Board acknowledged receipt of the Applicant's draft Scoping Document and its subsequent modification by the Planning Board's consultants, formally accepted that modified draft Scoping Document for purposes of circulation to involved and interested agencies, and scheduled a public scoping session for October 22, 2025. On October 22, 2025, the Planning Board held the scoping session to receive public comments on the draft Scoping Document. Written public comments were received through October 29, 2025.

On November 5, 2025, the Applicant's planning consultant, AKRF, submitted a memorandum to the Planning Board summarizing all oral and written comments on the draft Scoping Document received up to that date and providing the Applicant's responses.

The draft Scoping Document was subsequently modified by the Planning Board's attorney, and on January 14, 2026, by Resolution No. 5 of 2026, the Planning Board adopted that version as the final Scoping Document for this DEIS.

5.20.26

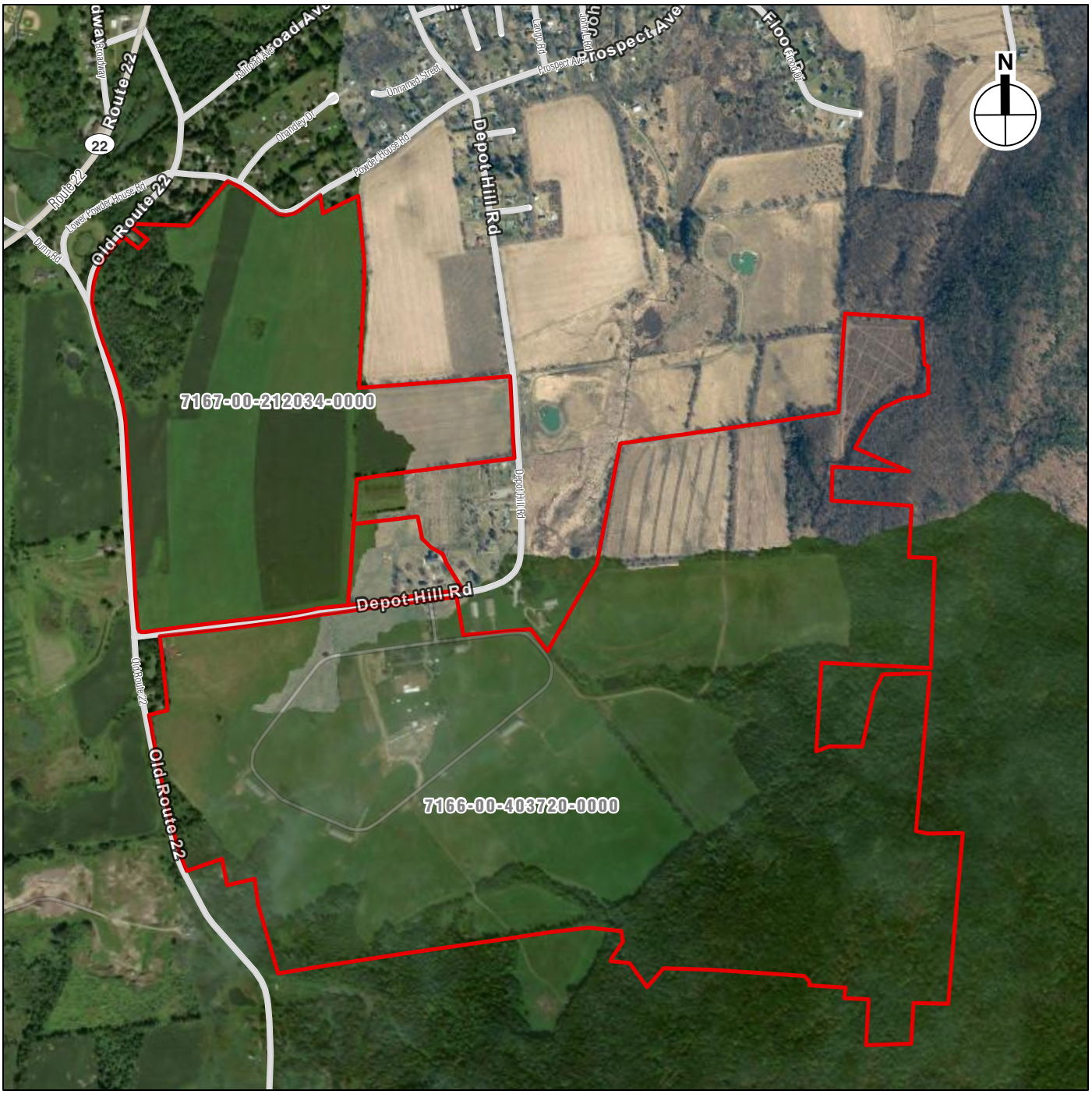


Project Location

KEANE STUD SUBDIVISION

Figure 1-1

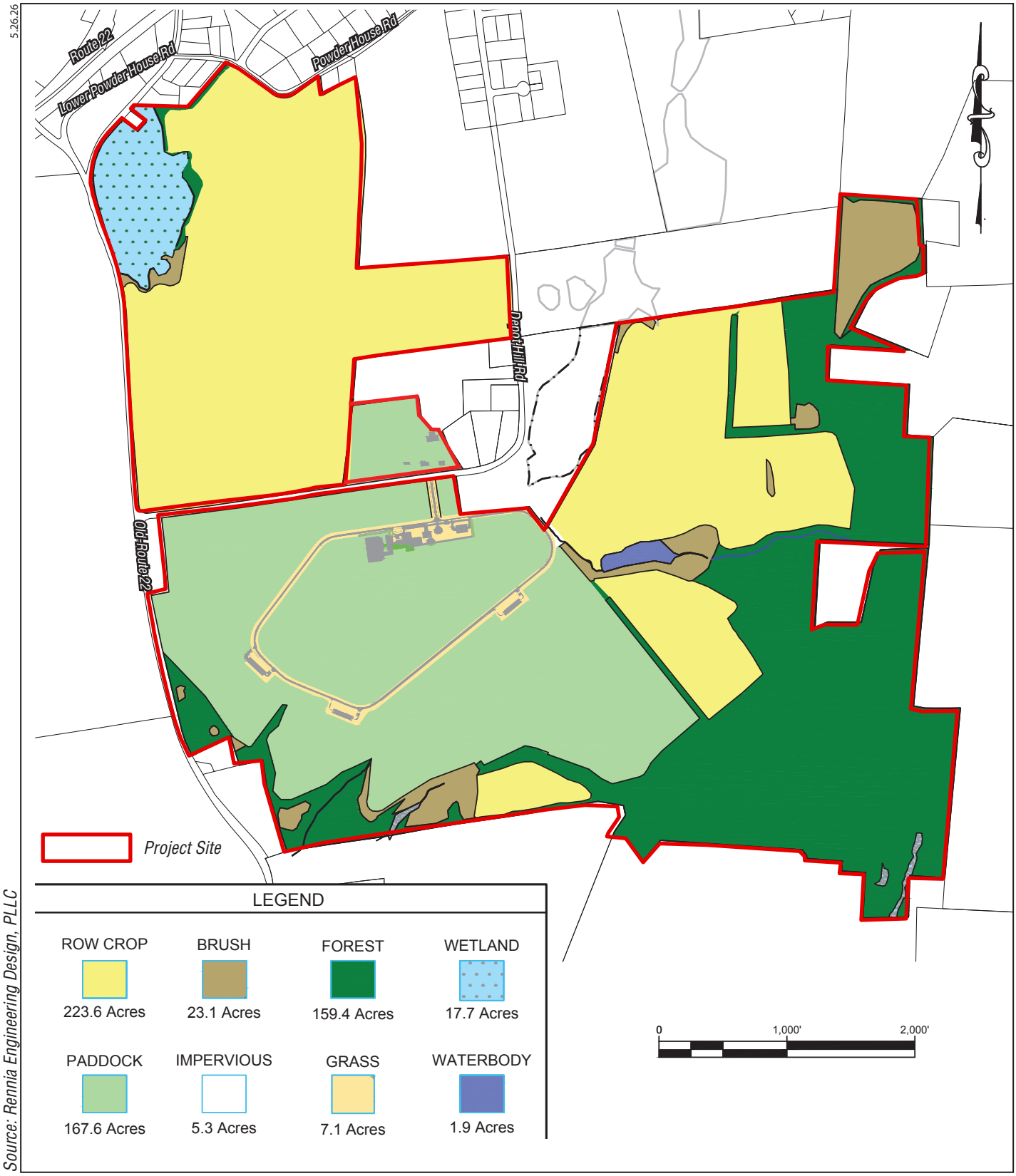
5.26.26



Site Aerial

KEANE STUD SUBDIVISION

Figure 1-2



Site Existing Land Cover

KEANE STUD SUBDIVISION

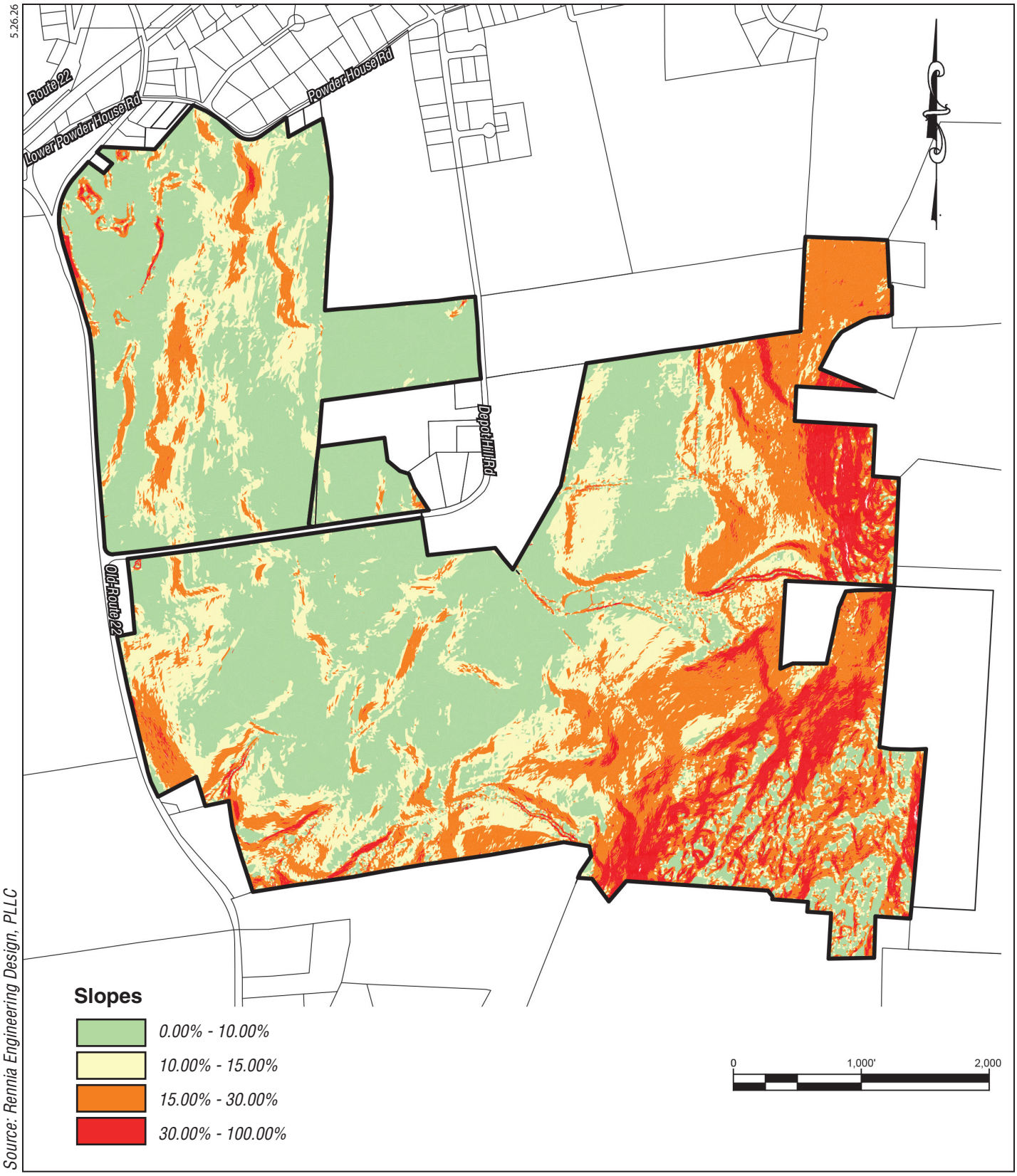
Figure 1-3

Source: Rennia Engineering Design, PLLC

KEANE STUD SUBDIVISION

Site Soils

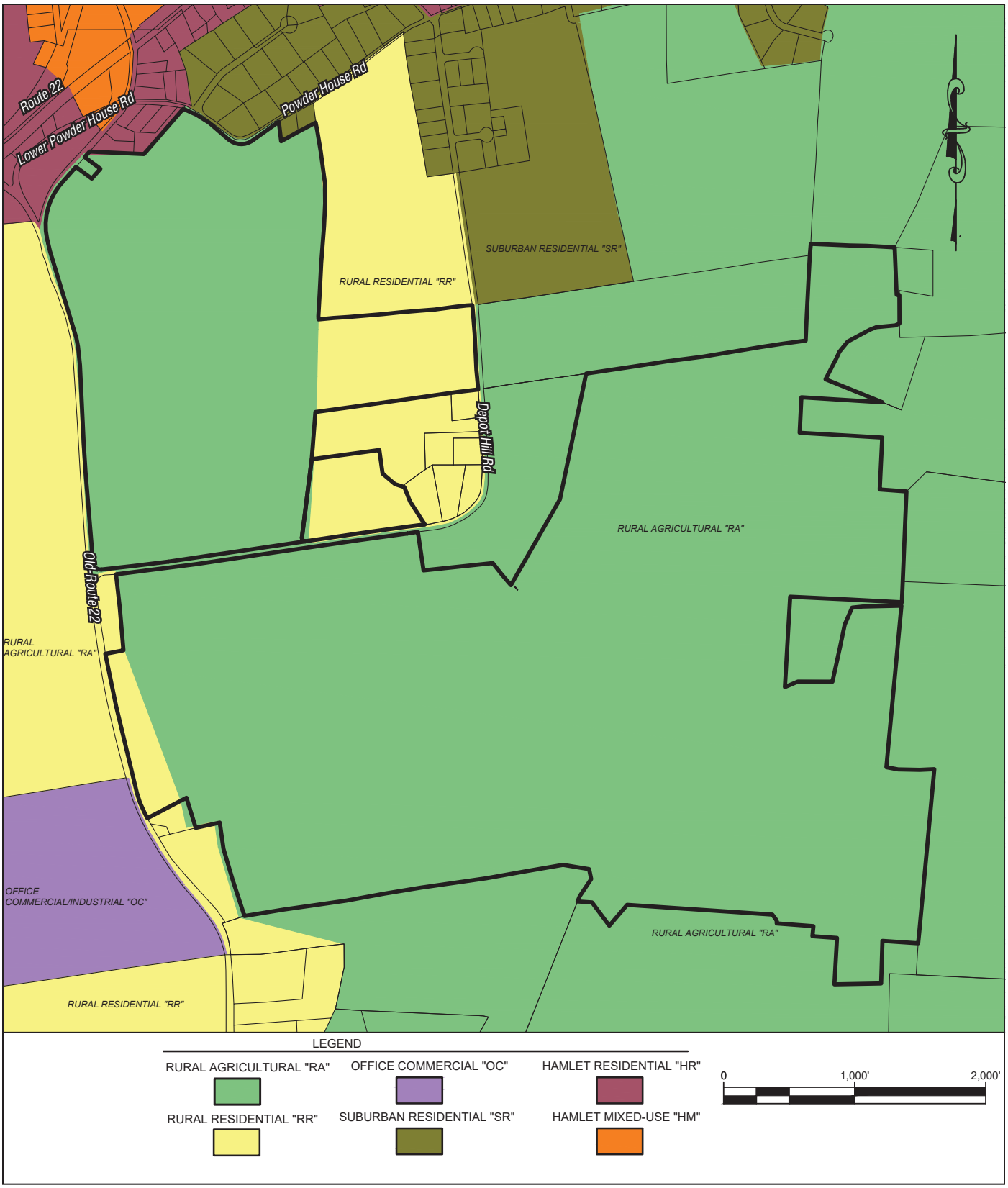
Figure 1-4



Site Steep Slopes

KEANE STUD SUBDIVISION

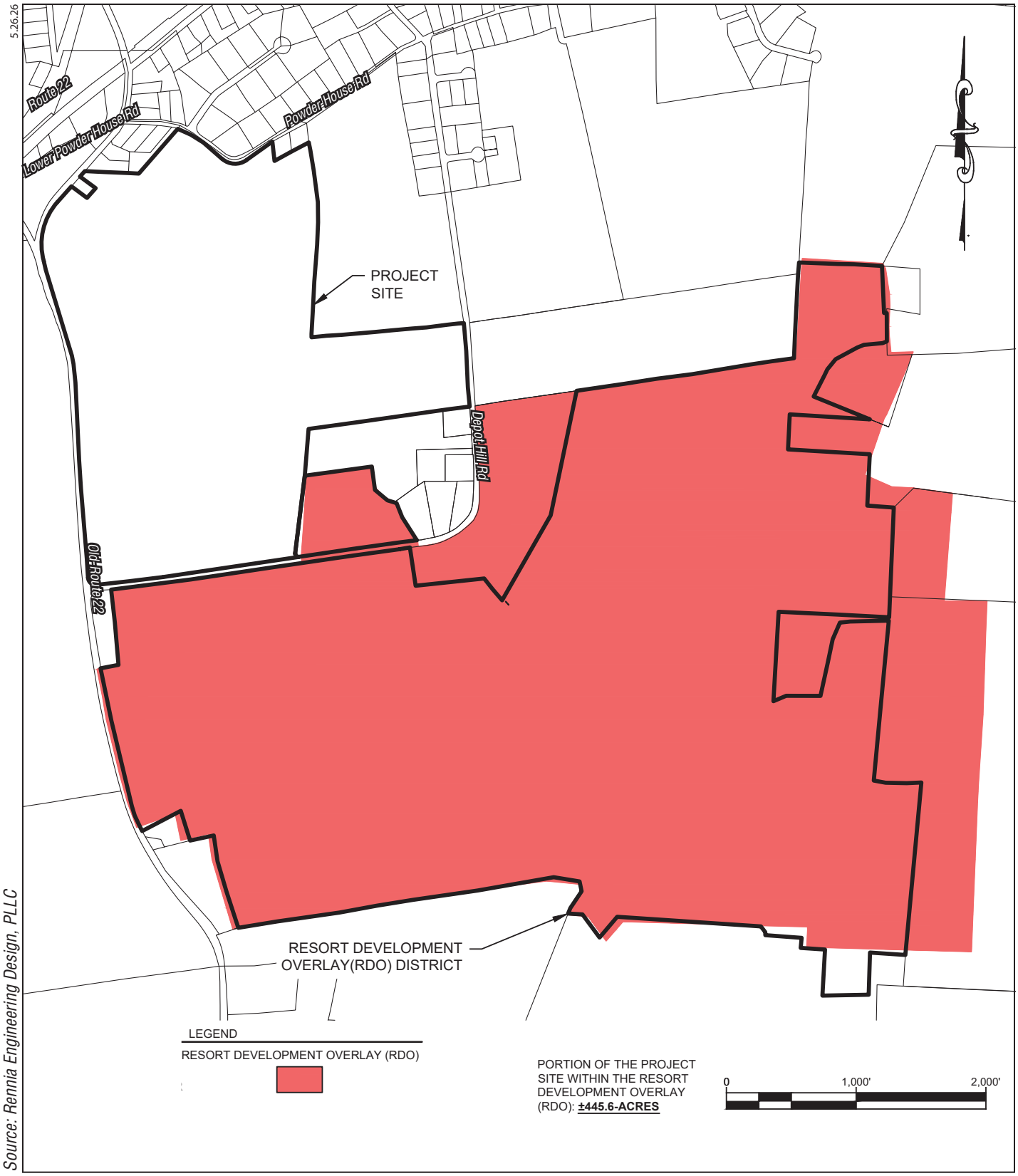
Figure 1-5



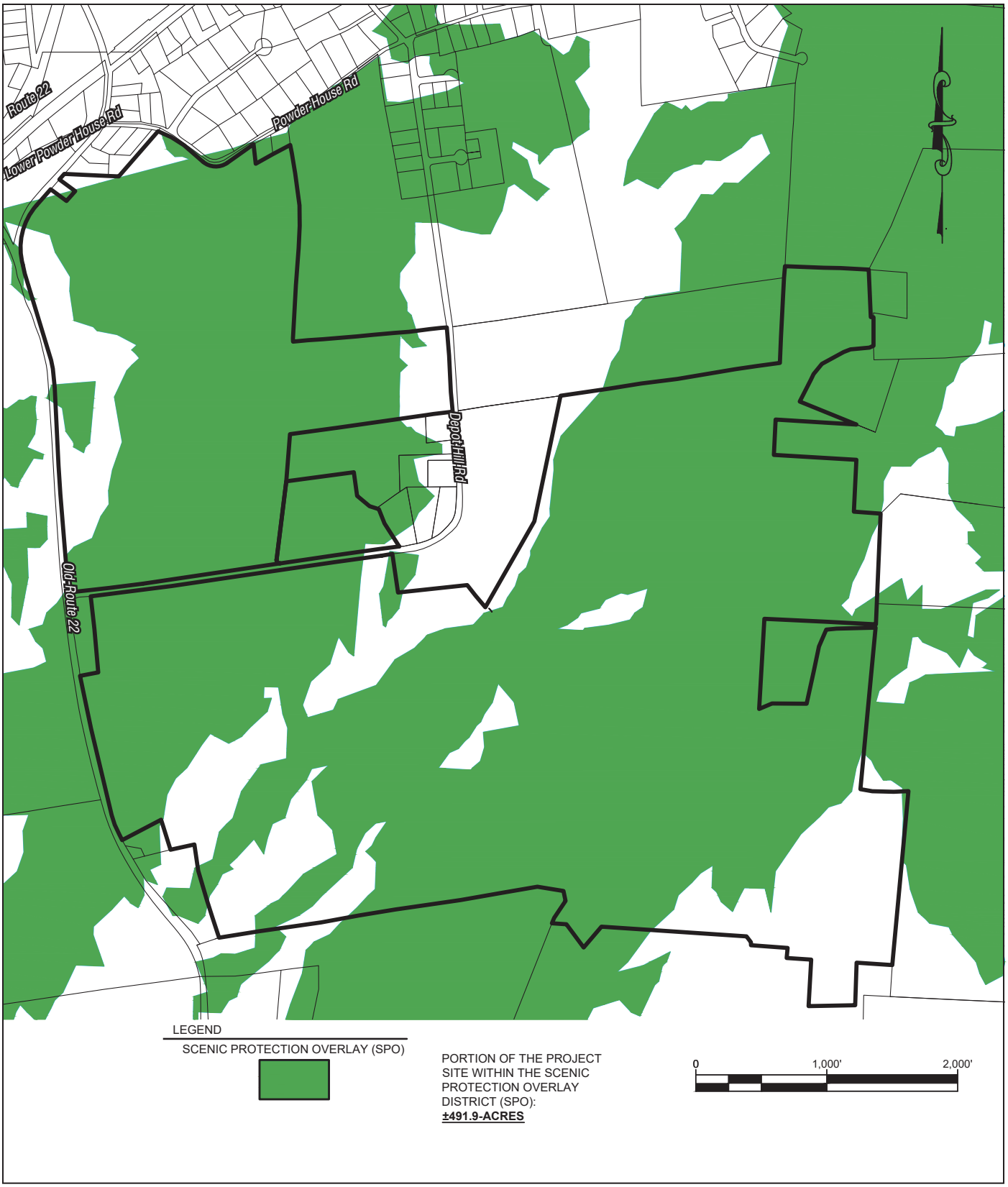
Site Zoning - Rural Residential (RR) and Rural Agriculture (RA)

KEANE STUD SUBDIVISION

Figure 1-6a



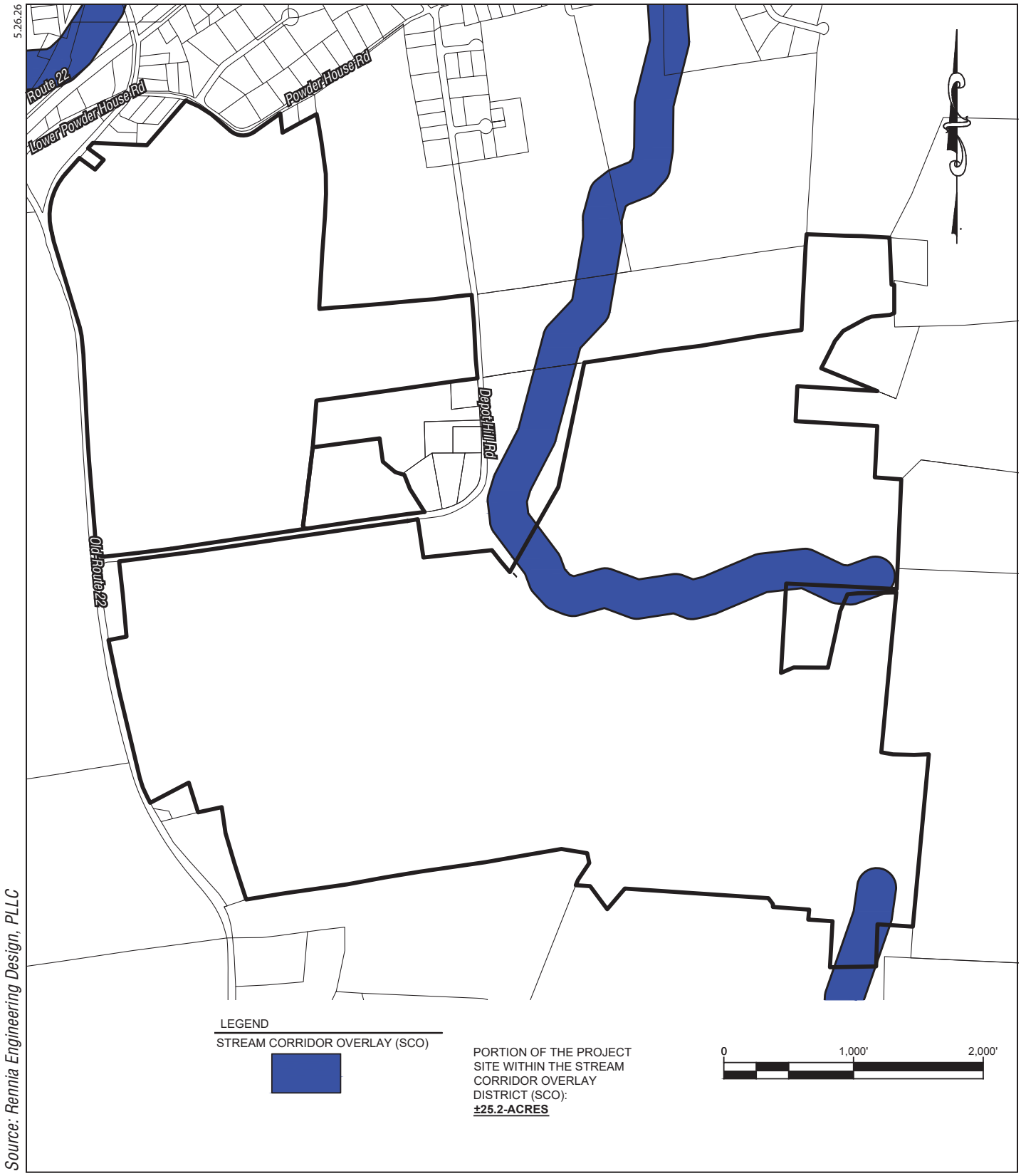
Site Zoning - Resort Development Overlay (RDO)



Site Zoning - Scenic Protection Overlay (SPO)

KEANE STUD SUBDIVISION

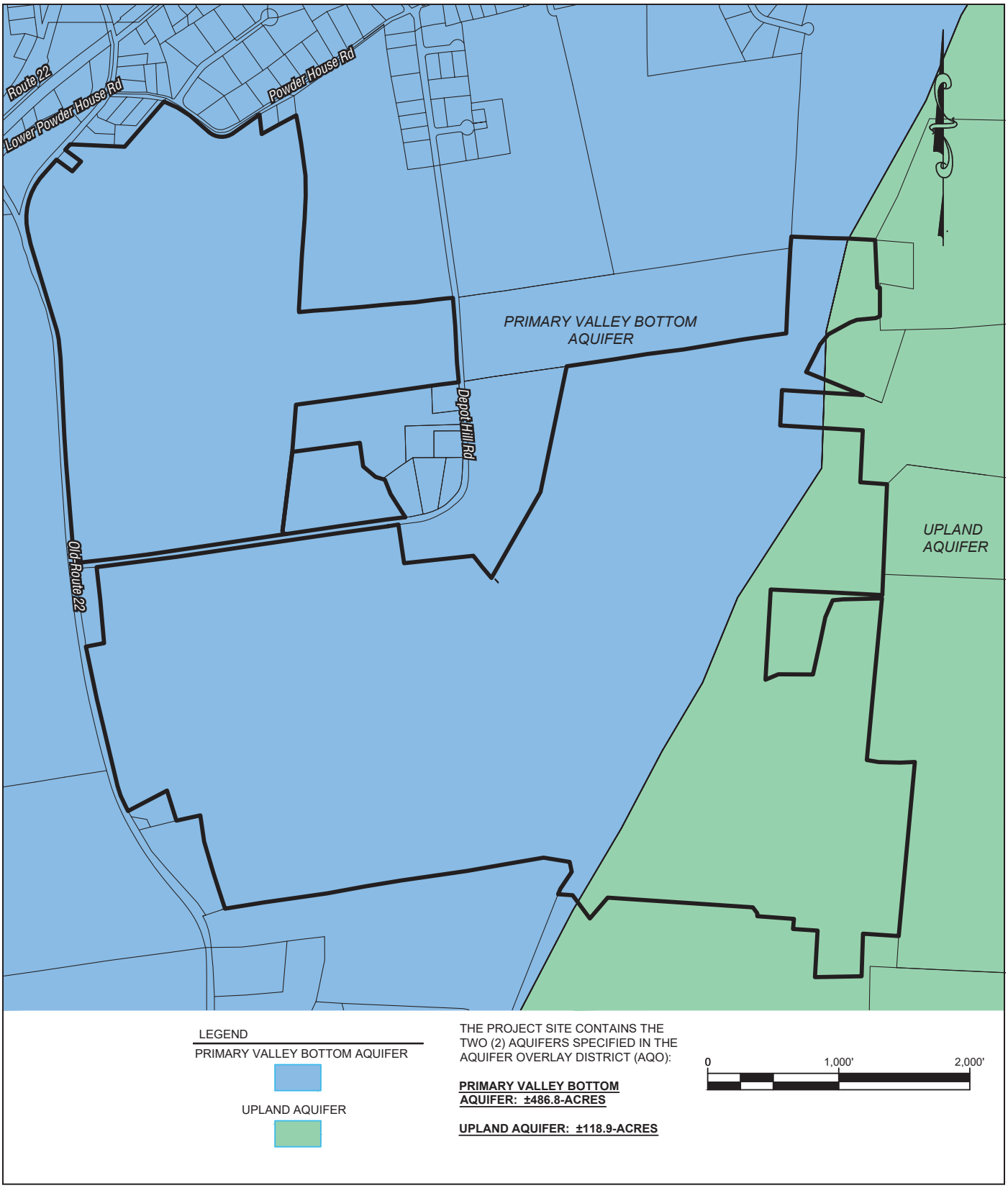
Figure 1-6c



Site Zoning - Stream Corridor Overlay (SCO)

KEANE STUD SUBDIVISION

Figure 1-6d

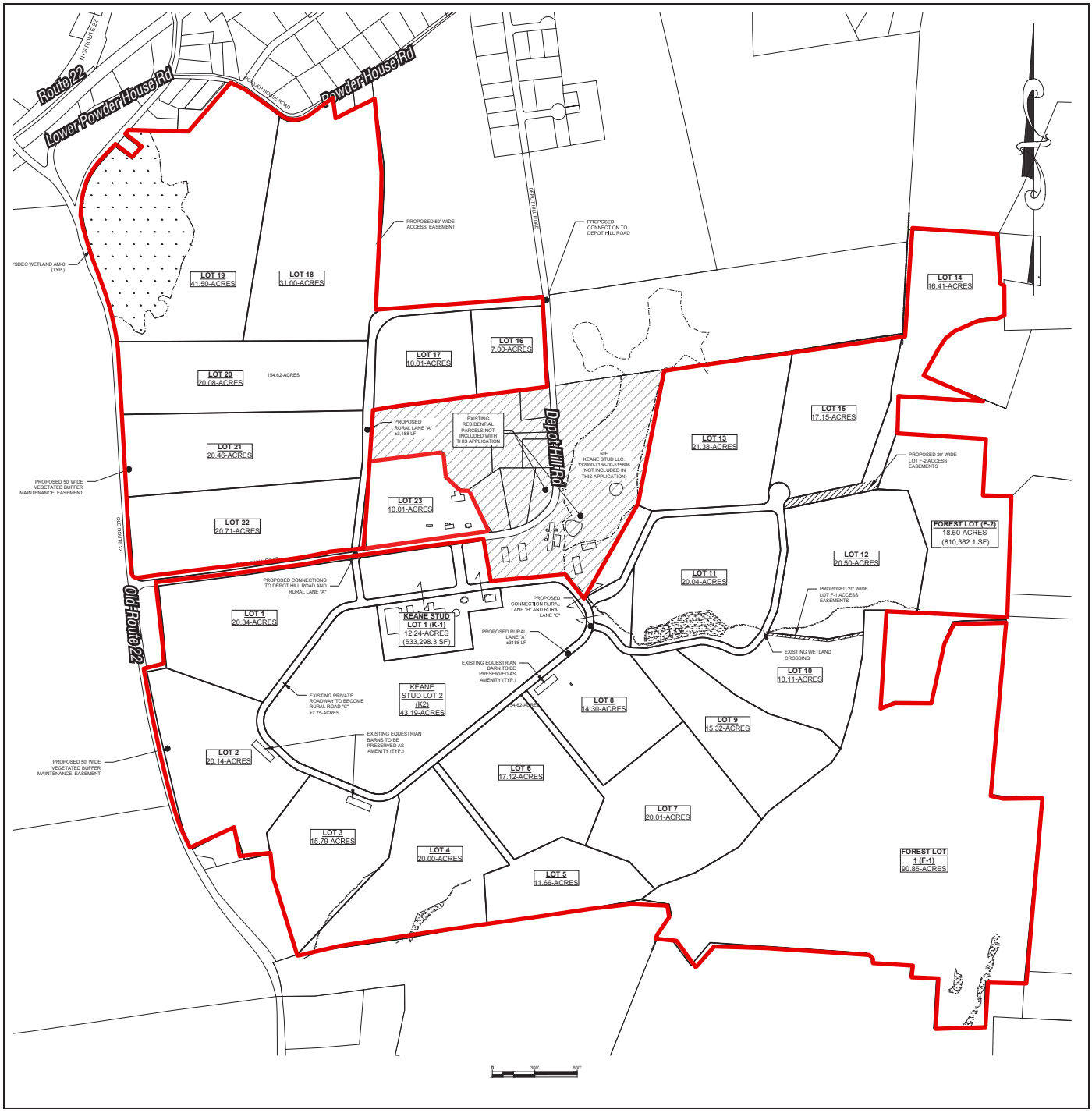


Site Zoning - Aquifer Overlay (AQO)

KEANE STUD SUBDIVISION

Figure 1-6e

5.26.26



Source: Rennia Engineering Design, PLLC

Site

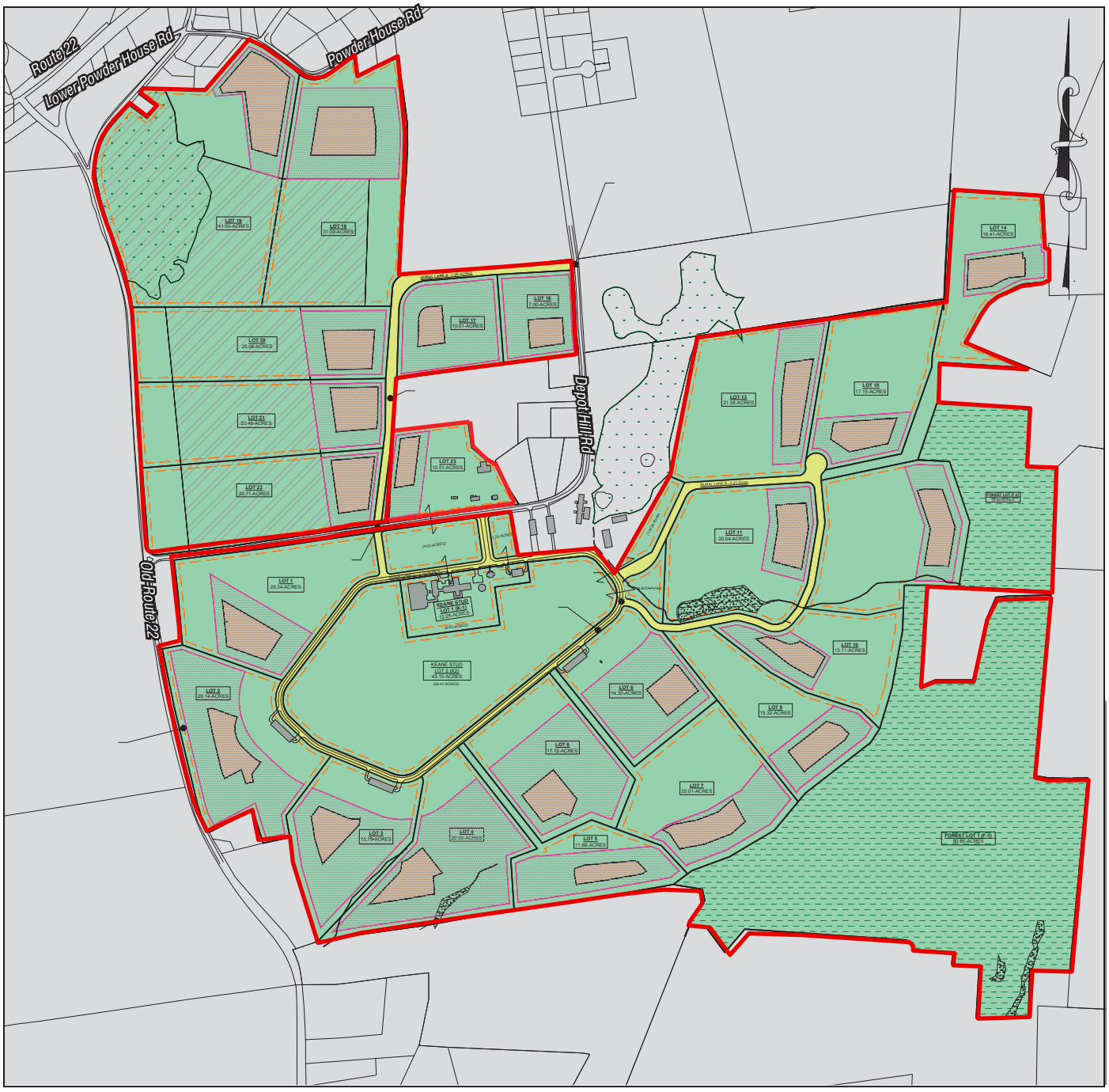
Proposed Project Property Line(s)

Proposed Subdivision

KEANE STUD SUBDIVISION

Figure 1-7

5.26.26



Source: Rennia Engineering Design, PLLC

Site

Agricultural/Open Space Area

Residential Perimeter

Residential Development Area (RDA)

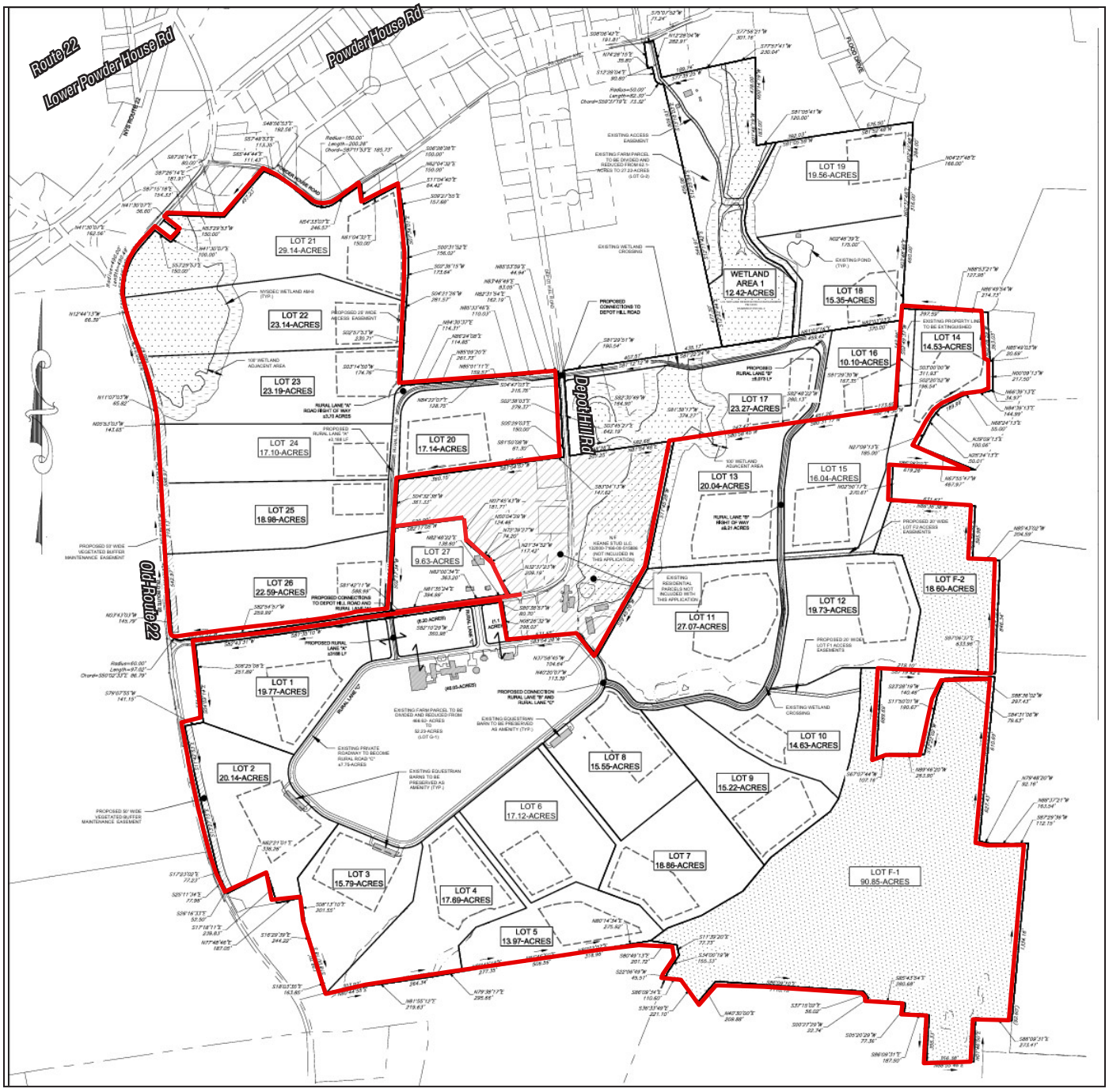
Non-Vertical Zone (NVZ)

Rural Lane & Right-Of-Way (ROW)

Proposed Subdivision - Conserved Land and Residential Development Areas

KEANE STUD SUBDIVISION

Figure 1-8



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Source: Rennia Engineering Design, PLLC

Site

Original 32-Lot Conventional Subdivision (2021)

KEANE STUD SUBDIVISION

Figure 1-9